

**Pfizer 2017**

**Disclosure Code Transparency  
Report**

**Methodological Note**

**Pfizer in Czech Republic**

<b>1. INTRODUCTION .....</b>	<b>3</b>
<b>2. PFIZER ACTIVITIES PER EFPIA CATEGORY .....</b>	<b>4</b>
<b>3. SOURCES OF INFORMATION .....</b>	<b>5</b>
<b>4. DEFINITIONS .....</b>	<b>6</b>
4.1 Products concerned .....	6
4.2 Definition of HCP.....	6
4.3 Definition of HCO .....	6
4.4 Country Unique Identifier (“CUI”):.....	6
4.5 Transfer of Value.....	6
4.6 Excluded Transfers of Value.....	7
4.7 Timing and date of the Transfer of Value .....	7
4.8 Value and currency .....	7
<b>SPECIFIC CASES OF TRANFER OF VALUE .....</b>	<b>ERROR! BOOKMARK NOT DEFINED.</b>
<b>5. 7</b>	
5.1 Transfer of Value in case of partial attendances or cancellation .....	7
5.2 Multi-year contracts.....	8
5.3 Transfers of value from Pfizer legal entities in other countries (cross border transfers of value)	8
5.4 HCPs paid as part of the payroll.....	8
5.5 The Company does not fulfil the features of a HCO .....	8
5.6 Treatment of the events initiated by the HCO but organized by the third party .....	8
5.7 Treatment of the events initiated and organized by the third party who is not HCO.....	9
5.8 Market research.....	9
5.9 Treatment of transfer of values related to research and development.....	9
<b>6. CONSENT MANAGEMENT .....</b>	<b>9</b>
6.1 Consent from HCPs to disclose transfers of value .....	9
6.2 Consent from HCOs to disclose transfers of value .....	10

## 1. Introduction

We regularly work with healthcare professionals (“HCPs”) and healthcare organizations (“HCOs”) who advise us on a range of topics such as medicines development, the role of a medicine in a patient treatment pathway; health economics and clinical best practice. These working relationships are essential to gaining the real-world information we need in order to deliver treatment choices that improve the health of patients and to share information that may be relevant to clinical decision making.

We want people to know, and understand, what we do and how we do it. We are committed to transparency about how we operate as a business and about the relationships we have with HCPs and HCOs. Sharing information about these relationships in a straightforward and open way will, we hope, help explain the critical value these relationships bring to patient management.

We believe that transparency is essential to building and maintaining confidence in us and in our medicines and strongly support the work being done by The European Federation of Pharmaceutical Industries and Associations (EFPIA) to improve transparency across the pharmaceutical industry.

The EFPIA Disclosure Code provides a common basis for reporting across Europe in relation to transfers of value.

For more information on this Code visit: <http://transparency.efpia.eu> or <http://www.aifp.cz/cs/etickejednani/transparentni-spoluprace>. The disclosure of payments made to HCPs and HCOs during 2017, will be available on <http://www.transparentnispoluprace.cz/>.

This report discloses all the transfers of value made to HCPs and HCOs in 2017. This methodological note presents some of the key aspects of how the transfers of value are categorized and in what format they are disclosed.

The transfers of value disclosed in this report cover all the payments made by Pfizer PFE spol. s r.o. and Pfizer, spol s.r.o. (“Pfizer”), to HCPs and HCOs resident in Czech Republic.

## 2. Pfizer activities per EFPIA category

The following table defines what activities are reported in which EFPIA category and subcategory.

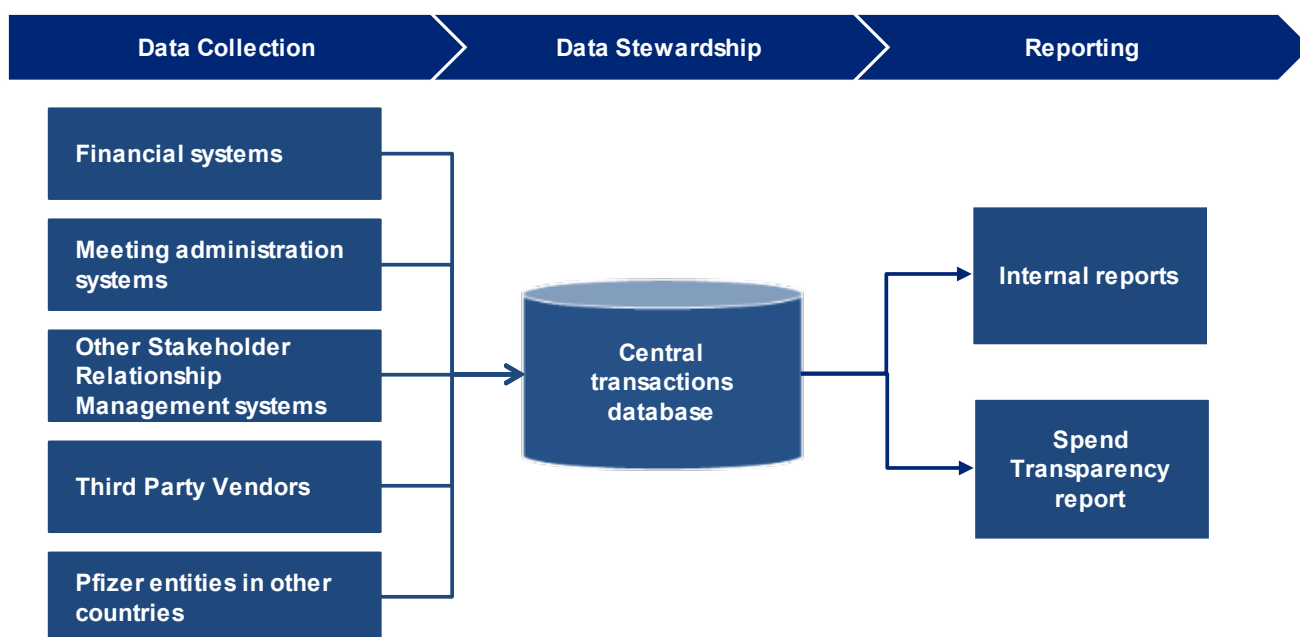
EFPIA category	EFPIA subcategory	Activities
Donations and Grants (HCOs only)	n/a	<ul style="list-style-type: none"> <li>Charitable contributions</li> <li>Business Donations</li> <li>Educational grants (e.g. fellowships, courses provided by a HCO where the Pfizer does not select the individual HCPs participating)</li> <li>Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants</li> </ul>
Contribution to Cost of Events	Sponsorship agreements (HCOs only)	<ul style="list-style-type: none"> <li>Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program</li> <li>Funding an event in return for a display booth</li> <li>Funding an event in exchange for advertising space</li> <li>Other advertisement space (in paper, electronic or other format)</li> <li>Satellite symposia at a congress</li> <li>If part of a package: Name badges, drinks, meals etc. provided by the organizers (included in the sponsorship agreement)</li> <li>Any other activity qualified as "Corporate Sponsorship" according Pfizer's Anti-Corruption Policies</li> <li>Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as "Corporate Sponsorship" according Pfizer's Anti-Corruption Policies</li> </ul>
	Registration fees	<ul style="list-style-type: none"> <li>Fees paid for the HCP to attend events not organized by Pfizer</li> </ul>
	Travel & Accommodation	<ul style="list-style-type: none"> <li>Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>Accommodation</li> <li>Visa</li> </ul>
Fee for services and consultancy	Fees	<ul style="list-style-type: none"> <li>Speaker engagements</li> <li>Advisory Boards*</li> <li>Study-related engagements</li> <li>Preceptorships</li> <li>Post-marketing surveillance studies</li> </ul>

		<ul style="list-style-type: none"> <li>• Medical writing</li> <li>• Data analysis</li> <li>• Development of education materials</li> <li>• General consulting / advising</li> <li>• Speaker training if linked to a speaker engagement</li> <li>• Any other activity which qualifies as General Consultancy according to Pfizer’s Anti-Corruption Policies</li> </ul>
	Related expenses	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> <li>• Visa</li> </ul>
Research and Development Transfers of Value	n/a	<ul style="list-style-type: none"> <li>• Clinical Trials</li> <li>• Data Monitoring Committees related to studies</li> <li>• Non Interventional Studies</li> <li>• Investigators Initiated Research (IIR)</li> <li>• Clinical &amp; Research Collaboration</li> </ul>

\* excluding Data Monitoring Committees related to studies which are disclosed in aggregate under R&D

### 3. Sources of Information

The data for the transfers of value disclosed in this report are taken from a variety of source systems within Pfizer. Below is a high-level overview of the processes for collection and reporting of the data.



The transfers of value are collected from the internal and external data sources and systems and then fed into a central database where data is validated and stewarded. From the database, the disclosure reports are generated.

## **4. Definitions**

### **4.1 Products concerned**

Each Member Company shall document and disclose Transfers of Value that are related to prescription medicines and are made, directly or indirectly, to or for the benefit of a Recipient.

### **4.2 Definition of HCP**

Any person entitled to either prescribe or dispense a medicine. This definition follows the legal definition of HCP in the Czech Advertising Regulation Act. With regards to this legal definition, transfers of values to other healthcare professionals, e.g. nurses, do not fall within the scope of the disclosure obligation.

### **4.3 Definition of HCO**

Any legal person (i) that is a healthcare, medical or scientific institution, association or organization (irrespective of the legal or organizational form) such as hospitals, clinics, professional associations, foundations, universities or other teaching institutions or (ii) through which one or more healthcare professionals provide their services. A healthcare organization is also the company or other legal entity established by another healthcare professional who may also be its employee.

### **4.4 Country Unique Identifier (“CUI”):**

For **HCPs** the CUI is the “ČLK” number. This is the number assigned to each HCP in Czech Republic, being the identifier of the Czech medical chamber member.

For **HCOs** the CUI is the “IČO” number. The number is assigned to each organization in Czech Republic that has the legal personality.

### **4.5 Transfer of Value**

Direct and indirect transfers of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of generic or branded prescription-only Medicinal Products exclusively for human use.

Transfers of Value provided to an HCP are necessary to divide into following categories:

- Contribution to costs related to events, such as registrations fees and travel and accommodation
- Fees for service and consultancy

Transfers of Value provided to an HCO are necessary to divide into following categories:

- Donations and grants

- Contributions to costs related to events, such as registration fees, sponsorship agreements and travel and accommodation
- Fees for service and consultancy

Direct transfers of value are those made directly by Pfizer for the benefit of a Recipient.

Indirect transfers of value are those made on behalf of Pfizer for the benefit of a Recipient, or transfers of value made through an intermediate and where the Member Company knows or can identify the HCP/HCO that will benefit from the transfer of value.

#### **4.6 Excluded Transfers of Value**

Without limitation, Transfers of Value that (i) are solely related to over-the-counter medicines; (ii) are not listed in Article 3 of the AIFP Disclosure Code, such as items of medical utility, meals and drinks, samples; or (iii) are part of ordinary course purchases and sales of medicinal products by and between a Member Company and an HCP (such as a pharmacist) or an HCO do not fall within the scope of the disclosure obligation

#### **4.7 Timing and date of the Transfer of Value**

**Timing of transfers of value:** This report discloses all transfers of value in the scope whose timing falls within the year 2017. The transaction date is defined differently for direct and indirect transfer of value.

**Transfer of Value date:** the dates to be considered for disclosure are:

Date of direct transfer of value: the clearing date from the accounting system.

Date of indirect transfer of value: the reporting date is the end date of the event

#### **4.8 Value and currency**

**Currency:** Transfers of value are reported in Czech crowns. Transfers of value made in a different currency were converted to Czech crowns when the report was created applying the Pfizer standard exchange rates for the transfer of value day of payment were applied.

**Value Added Tax (VAT):** All transactions are reported in the gross amount including the VAT.

**Valuation of in kind donations:** In kind donations are reported at their purchase price including VAT.

## **5. SPECIFIC CASES OF TRANSFER OF VALUE**

### **5.1 Transfer of Value in case of partial attendances or cancellation**

Cancellation fees that a company pays for an HCP will not be disclosed as the Transfer of Value. Publication of cancellation fees for services that have not been consumed for e.g. illness of an HCP does not correspond to the purpose of the Disclosure Code.

In the case of earlier leaving from the sponsored event actually paid Transfers of Value shall be disclosure (e.g. full or partial payment of the registration fee, payment of fixed amounts – travel, accommodation etc.)

## **5.2 Multi-year contracts**

Where contracts are valid for more than one year, each individual transfer of value is captured and disclosed in the corresponding reporting period.

## **5.3 Transfers of value from Pfizer legal entities in other countries (cross border transfers of value)**

This report includes transfers of value to HCPs and HCOs who are residents of Czech Republic. This includes all transfers of value (direct and indirect) made by any Pfizer affiliates in the 33 European countries included in the EFPIA disclosure code. For non EFPIA countries, Pfizer will do their best effort to collect and disclose direct payments made by Pfizer affiliates.

In future disclosures, we will continue the journey to transparency including the continued improvement of our cross borders process.

## **5.4 HCPs paid as part of the payroll**

HCPs in Czech Republic are also engaged via standard payroll process. The transfer of value under payroll engagement is subject to the disclosure.

## **5.5 The Company does not fulfil the features of a HCO**

This subchapter applies in two cases. First, if the company does not fulfil the features of a HCO but a HCP is its sole founder. ("Individual HCP incorporated legal entities"). Company established by one professional is considered as a healthcare organization. Therefore, the provided transfers of value are published individually at the level of the HCO without the name of its owner.

Second, if the company does not fulfil the features of a HCO but more persons including HCPs are its founders, it does not have to be clear whom the transfers of value was intended to in the company. It is not possible to disclose a payment with the name of the company (because it is not a healthcare organization by definition) but the name of a particular recipient - a healthcare professional - must be stated. In this case his/her consent must be obtained or a contract must be closed.

## **5.6 Treatment of the events initiated by the HCO but organized by the third party**

Primarily, it has to be elucidated who is the real convener of the respective event. The convener is a person who convenes the event, i.e. the one whose initiative led to organization of the event. The organizer is a subject who only organizes the event and through whom the transfers of value are done to the final subjects. It is irrelevant whether the contract with the pharmaceutical company is concluded by the organizer or convener but the decisive point is who the ultimate recipient of the payment is. For identification of a convener and organizer it is not decisive who is stated as official convener. It is possible that the subject who is in fact only the organizer will be stated in the invitation card. However, the fact who is responsible for the initiative to organize the event is decisive. Pfizer took all available measures to identify the convener as the recipient of the transfer of value.



## **5.7 Treatment of the events initiated and organized by the third party who is not HCO**

In the case that the organizer of the event does not fall under the definition of a healthcare organization and organizes the event on its own initiative, the payments provided by the pharmaceutical company to the involved healthcare professionals and organizations will not be disclosed, either individually or collectively (e.g. a municipality organizes a seminary with a topic of healthcare).

## **5.8 Market research**

According to the Disclosure Code the payments or other transfers of value to the companies which perform market research do not need to be disclosed if the identity of the healthcare professionals or organizations taking part in the research is not known.

## **5.9 Treatment of transfer of values related to research and development**

Transfer of values related to clinical and non-clinical studies will be disclosed in aggregate level. Exceptions to this methodology are post registration non-interventional clinical studies with retrospective character that will be disclosed on individual level in reporting categories services and consultancies. Non-interventional clinical studies with prospective character will be disclosed in aggregate level.

# **6. CONSENT MANAGEMENT**

## **6.1 Consent from HCPs to disclose transfers of value**

The condition which is necessary for processing of personal data of the HCP in the project Disclosure includes obtaining the consent from the healthcare professional with processing of personal data. Pfizer applies a written agreement with HCP including specific legal provisions.

Pfizer requires HCPs to provide consent to disclose the transfers of value made to them. If the HCP consents to disclosure, the sum of all transfers of value to that HCP during the reporting period is disclosed under their name split between categories of the transfer of value.

If the HCP does not provide consent to disclosure, all the transfers of value in the reporting period are reported in the “aggregate” section of the report, according to the category of the transfer of value, without stating the details of HCP. The transfer of value is not disclosed under the name of the HCP, but as part of the sum of all the transfers of value to any HCP who did not provide consent during the reporting period.

Pfizer requires HCP to provide the consent information one per reporting period. The decision of HCP is applied on each transaction with the HCP during the reporting period for which it was provided.

Nevertheless for 2017 cross border transfer of values, we were not ready to collect consent and we disclose them in the “aggregate” section of the document.

If the consent of HCP was revoked, the data controller (Member Company) and data processor (AIFP as a Database provider) shall terminate the processing operations pertaining to the respective personal data and withdraw corresponding personal data from its website and/or destroy any such personal data unless legislation imposed upon the data controller/processor prevents it from destroying all or part of

the personal data processed. In that case, these transfers of value will be disclosed on an aggregated basis.

## **6.2 Consent from HCOs to disclose transfers of value**

Pfizer obtains consents from HCOs to the disclosure of the transfers of value made to them. The consent is being collected per each transaction with HCO. Consent to HCOs is part of the document “Funding confirmation letter”, being a mandatory document enforced by the company’s standard operating procedure for compliance purposes.

We do our best effort to advocate for transparency and convince HCP and HCO to provide their consent.

The HCOs, i.e. legal entities are not subject to personal data protection under the law and therefore the consent collection is not required; however it is recommended to obtain an acknowledgement or confirmation that the transfer of value is not HCO’s trade secret.