

Pfizer 2022

**Methodological Note Supporting The Disclosure
Report For Transfer Of Value In 2021**

Pfizer Switzerland

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1. Introduction – Pfizer’s Commitment to Transparency Reporting

We regularly work with healthcare professionals (HCPs) and healthcare organisations (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 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 Disclosure Code from EFPIA (European Federation of Pharmaceutical Industries and Associations) and the PCC (Pharma-Cooperation-Code), from scienceindustries as a Swiss EFPIA-member association, provide a common basis for reporting across Europe in relation to transfers of value (ToVs). For more information on these Codes please visit:

<http://transparency.efpia.eu> or [scienceindustries - Pharma-Kooperations-Kodex](#)

This methodological note presents how the transfers of value are categorized and in what format they are disclosed.

Please be informed that according to the decision made by the Pharma-Code Commission in April 2018, Pfizer Switzerland decided not to disclose any transfer of values to international organizations based in Switzerland with focus on non-profit services in the health sector (for example; WHO, UNHCR, IFRC, GABI etc.). These are specialized institutions for which disclosure of transfer of values under the PCC disclosure code does not seem reasonable in view of the sense and purpose of the Transparency Initiative. The respective organizations disclose potential cooperation directly.

2. Transfer of Value by EFPIA-categories

The following table defines what transfer of value are reported in which EFPIA category and subcategory.

EFPIA category	EFPIA subcategory	Example Activities
Donations and Grants (HCOs only)	n/a	<ul style="list-style-type: none"> Charitable contributions Business Donations Educational grants (e.g. fellowships, courses provided by an HCO where Pfizer does not select the individual HCPs participating) Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants
Contribution to Cost of Events	Sponsorship agreements (HCOs only)	<ul style="list-style-type: none"> Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program Funding an event in return for a display booth Funding an event in exchange for advertising space Other advertisement space (in paper, electronic or other format) Satellite symposia at a congress If part of a package: Name badges, drinks, meals etc. provided by the organisers (included in the sponsorship agreement) Any other activity qualified as “Corporate Sponsorship” according to Pfizer’s Anti-Corruption Policies Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as “Corporate Sponsorship” according to Pfizer’s Anti-Corruption Policies For contributions provided to Events through Professional Conference Organisers (PCOs): ToVs through PCOs are reported as follows: <ul style="list-style-type: none"> - either in the name of benefitting HCO - or in the name of Recipient PCO
	Registration fees	<ul style="list-style-type: none"> Registration fees paid for the HCP/HCO to attend events
	Travel & Accommodation	<ul style="list-style-type: none"> Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation) Accommodation Travel Visa

Fee for services and consultancy and other payments for contractual services of an HCP/HCO	Fees	<ul style="list-style-type: none"> • Speaker engagements • Advisory Boards* • Study-related engagements • Preceptorships • Post-marketing surveillance studies • Non-Interventional Studies that are Retrospective in nature • Medical writing • Data analysis • Development of education materials • General consulting / advising • Speaker training if linked to a speaker engagement • Any other activity which qualifies as General Consultancy according to Pfizer's Anti-Corruption Policies
	Related expenses	<ul style="list-style-type: none"> • Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Travel Visa
Research and Development Transfers of Value	n/a	<ul style="list-style-type: none"> • Clinical Trials • Data Monitoring Committees related to studies • Non Interventional Studies that are Prospective in nature • Investigators Initiated Research (IIR) • Investigator Sponsored Research (ISR) • Clinical & Research Collaboration

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

3. Definitions

HCP (Healthcare professionals): Physicians, dentists and pharmacists who are working in particular in a practice or hospital together with pharmacists active in retail businesses and persons who are authorised by the Swiss law on therapeutic products to prescribe, deliver, and/or administer prescription-only medicinal products for humans. This definition also includes official representatives and persons with a public-law employment contract or mandate if they perform or are authorised to perform such activities. In case of doubt, the Confederation's provisions on therapeutic products can be taken in account.

HCO (Healthcare organisations): Legal entities under private and public law as well as companies, sole proprietorships or other entities that are not specifically regulated in legal terms who employ healthcare professionals. These in particular include institutions, organisations, associations or other groups of healthcare professionals who provide healthcare services or consultancy or other groups of healthcare (e.g. hospitals, clinics, foundations, universities or other educational establishments, scientific societies or professional associations, community practices or networks, but not patient organisations)

Covered Recipient: healthcare professionals or healthcare organisations together with patient organisations who have their primary practice or definitive business address or their registered office in Switzerland.

PCO (Professional Conference Organizer): Event organizers specializing in the organization and implementation of congresses, meetings, seminars and similar events.

PO/PAG (Patient organisations): Not-for-profit organisations (including the organisations to which they are affiliated) based or active in Switzerland, which consist primarily of patients or their carers and which represent or support the needs of patients or their carers. This definition also includes persons who represent and/or formulate the collective concerns and interests of a patient organization about a specific topic or a specific pathology.

ToV (Transfer of Value - general): in cash, as non-cash contributions, donations, grants or payments made either directly or indirectly in some other form for consultancy tasks or services, research and development, event support, advertising, sales or other purposes, always in connection with medicinal products as defined in the PCC. Direct ToVs are those which a pharmaceutical company provides directly to a particular recipient. Indirect ToVs are those which a third party provides for a recipient in the name or on behalf of a pharmaceutical company, whereby the identity of the pharmaceutical company known or recognisable to the recipient.

ToV (Transfer of Value – research and development services): benefits paid to healthcare professionals and healthcare organisations in connection with the planning or conduct of clinical trials (in compliance with GCP standards), non-clinical trials (in compliance with GLP standards) and non-interventional studies that are prospective in nature (as defined by section 5 of the Pharma Code).

4. Scope of Disclosure

This report includes transfer of value processed by Pfizer Switzerland legal entities during the reporting period for 2021. The report may also include transfer of value initiated by Pfizer PFE Switzerland GmbH (a Viartis company) during the same period.

Timing of ToV: The disclosure report includes transactions which have a reportable date within the reporting period being disclosed.

Reportable date: the dates to be considered for disclosure reports are as follows:

In Cash ToVs - the clearing date is the reportable date

In Kind ToVs - meeting or event: end date is the reportable date;
- benefit in kind donation: start date is the reportable date

Cancellation, partial participation or No-shows at events:

- Cancellation Fees are not reported
- In case of partial participation at an event, the transfer of value are reported
- No-shows are not reported if Pfizer cannot confirm the in-kind benefit was received

Multi-year contracts: Where contracts are valid for more than one year, each individual ToV is captured and disclosed in the reportable disclosure period.

Consent to publish and GDPR legal basis for disclosure of ToV's: Pfizer Switzerland discloses the ToV based on the consent of the HCPs/HCOs to the disclosure of the ToVs made to them. If the recipients consent to disclosure, the sum of all ToV to that HCP or HCO during the reporting period is disclosed under their name.

The Pfizer EEA/Switzerland HCP Privacy Notice is available under the following link: <https://privacycenter.pfizer.com/en/hcp-sw>. We make our best effort to advocate for transparency and explain its societal benefits.

If the covered recipient has not provided consent (i.e., no consent, has been revoked or the individual has not objected to Pfizer's legitimate interest), the ToV are disclosed in the aggregate section of the report. This means that the transfer of value is not disclosed under their name, but as part of the sum of all the ToV.

Cross Border Reporting -ToV from Pfizer legal entities in other countries: The disclosure report includes ToV to HCPs and HCOs who practice in Switzerland. This includes all ToV (direct and indirect) made by any Pfizer affiliates in the European countries included in the EFPIA disclosure code. For non EFPIA countries, Pfizer will do their best effort to collect and disclose direct ToV made by Pfizer affiliates.

Co-Payment: According to the Swissmedic-ordinance, Pfizer charges a fee equivalent to a third (33.3%) of the costs associated with the ToVs in the categories „Registration fees“ and „Travel & Accommodation“. In some cases, the fee may be reduced for persons in training or education to a fifth (20%). The ToVs shown under these two categories reflect the amount covered by Pfizer and account for two third (66.6%) or four fifth (80%), for persons in training or education, of the actual total costs.

Currency: ToV are reported in local currency (CHF) on the disclosure report. ToVs made in a non-local currency were converted to local currency (CHF) prior to publication. The Pfizer standard exchange rates for the ToV day of payment are applied.

Disclosure language: Disclosure reports will be published using the language as defined by the local trade association code/law.

PO/PAG inclusion in disclosure reports: POs/PAGs will only be included in the disclosure report if they are in scope for reporting as defined in the country code/law.

Value Added Tax (VAT): Treatment of VAT depends on the ToV.

- Where possible, in kind related ToV's will be reported including tax.
- Where possible, in cash related ToV's will be reported including tax.

5. Publication

Publication/Republication: Pfizer Switzerland will publish the transparency disclosure reports in line with the country timelines as defined by the trade association or government (EFPIA and PCC). The report is published on the following homepage:

[Pharma-Kooperations-Kodex \(pfizer.ch\)](https://www.pfizer.ch/Pharma-Kooperations-Kodex)

Republication will be carried out as and when needed in line with local codes/laws.