



Pfizer Ltd Methodological Note 2016

**This Methodological Note has been created by
Pfizer Ltd. It provides supporting information about
Pfizer's transparency report published in June 2016**

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1. Introduction

We work with Healthcare Professionals and Healthcare Organisations 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 practise. The advice they give us is essential to help us to deliver treatment choices that improve the health of patients, and talking to them enables us to share information that may be relevant to clinical decision making.

We engage Healthcare Professionals as expert speakers to inform their peers on our medicines and the role they can play in the management of particular conditions alongside other treatment options, whilst sharing real-world data from their own clinical experience. We also provide funding towards the registration fees for Healthcare Professionals to attend third party medical educational meetings and conferences.

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 Healthcare Professionals and Healthcare Organisations. Sharing information about these relationships in a straightforward and open way will, we hope, help show that working with Healthcare Professionals brings value 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) and the Association of the British Pharmaceutical Industry (ABPI) 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.abpi.org.uk/our-work/disclosure/Pages/disclosure.aspx>

Here in the UK disclosure of payments made to Healthcare Professionals and Healthcare Organisations during 2015, will be available on the ABPI Shared Platform and (more detailed information) on Pfizer.co.uk on 30th June 2016

This report discloses all the Transfers of Value made to Healthcare Professionals and Healthcare Organisations in 2015. This methodological note presents 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, to the best of our knowledge, made by Pfizer to Healthcare Professionals and Healthcare Organisations resident in the UK

Transfers of Value disclosed in this report do not cover those-made by Hospira UK Ltd. Pfizer Ltd and Hospira UK Ltd are two separate legal entities, and each will publish separate disclosure reports in June 2016.

2. Pfizer activities per EFPIA category

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

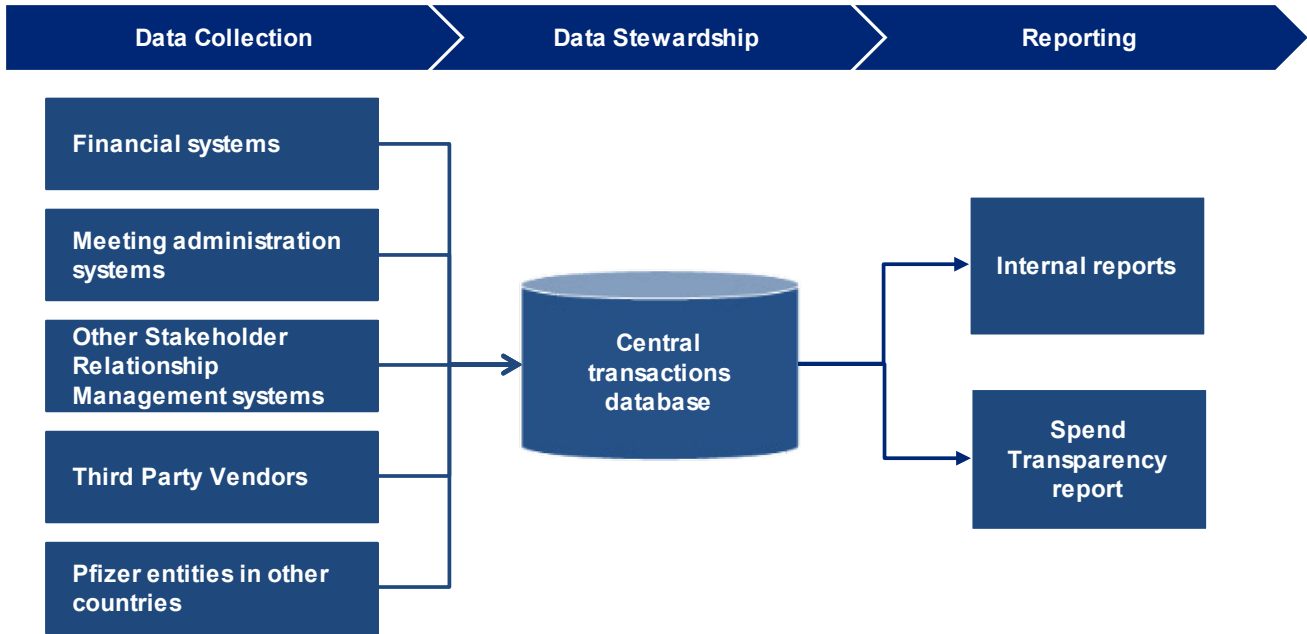
EFPIA category	EFPIA subcategory	Activities
Donations and Grants (HCOs only)	n/a	<ul style="list-style-type: none"> • Charitable contributions • Business Donations • Educational grants to Healthcare Organisations to support courses and meetings (where a member company does not select the individual HCPs who participate) • Medical and Educational Goods and Services (MEGS) 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/promotional stand • 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
	Registration fees	<ul style="list-style-type: none"> • Fees paid for the HCP/HCO to attend educational events not organised by Pfizer
	Travel & Accommodation	<ul style="list-style-type: none"> • Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation

Fee for services and consultancy	Fees	<ul style="list-style-type: none"> • Speaker engagements • Advisory Boards* • Study-related engagements • Preceptorships • Post-marketing surveillance studies • Medical writing • Data analysis • Development of educational 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
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 • Investigator-Initiated Research (IIR) • Clinical & Research Collaboration

* 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. Definition of the Transfers of Value

This section outlines some key aspects of how the Transfers of Value are defined.

- 4.1 Definition of a ‘Healthcare Professional’ (HCP):** The term ‘Healthcare Professional’ includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.
- 4.2 Definition of an ‘Other Relevant Decision Maker’ (ORDM):** The term ‘Other Relevant Decision Makers’ particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not Healthcare Professionals.
- 4.3 Definition of ‘Healthcare Organisation’ (HCO):** The term ‘Healthcare Organisation’ means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more Healthcare Professionals or Other Relevant Decision Makers provide services.
- 4.4 Pfizer employees who practise as Healthcare Professionals:** Any employee of Pfizer Ltd who also practises as a physician is out of scope for this report.
- 4.5 Definition of a direct Transfer of Value:** are those made directly by Pfizer for the benefit of a recipient.
- 4.6 Definition of an indirect Transfer of Value:** are those made on behalf of Pfizer for the benefit of a recipient, or a Transfer of Value made through an intermediary and where the member company knows or can identify the Healthcare Professional / Healthcare Organisation that will benefit from the Transfers of Value.
- 4.7 Timing of Transfers of Value:** This report discloses all Transfers of Value whose transaction date falls within the year 2015. The transaction date is defined as the clearing date in the financial system.
- 4.7.1 Transfer of Value date:** the dates to be considered for disclosure are:
- Direct Transfers of Value: payment date is the SAP financial system clearing date
 - Indirect Transfers of Value: reporting date is the date of the event (last day of the event in case of multi-days event)
- 4.7.2 Transfer of Value in case of partial attendances or cancellation:**
- Cancellation fees are not reported
 - Transfers of Value in case of a Healthcare Professional partially attending an Event are disclosed

4.8 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.

4.9 Consent from Healthcare Professionals to disclose Transfers of Value: Pfizer asks Healthcare Professionals whether they consent to the disclosure of the Transfer of Value made to them. Consent is usually obtained for each activity undertaken and the relevant provisions are incorporated into the agreement with the Healthcare Professional.

4.9.1 If the Healthcare Professional consents to disclosure, the sum of all Transfers of Value to that Healthcare Professional during the reporting period is disclosed under their name. The Transfers of Value to Healthcare Organisations are reported in the same way.

4.9.2 Pfizer's standard contract was amended early in 2015 to include a 'consent to disclose' clause. Where consent was not obtained at the time of contracting with the Healthcare Professional, the Healthcare Professional was asked to provide retrospective consent to disclose the relevant Transfer of Value. Where Pfizer has not received consent from a Healthcare Professional to disclose a Transfer of Value, Pfizer has reported this Transfer of Value in the "aggregate" section of the report. This means that the Transfer of Value is not disclosed under the name of the individual Healthcare Professional, but as part of the sum of all Transfers of Value to any Healthcare Professional who did not provide consent to the disclosure of at least one Transfer of Value during the reporting period.

In cases where Healthcare Professionals have not given retrospective consent to disclose Transfers of Value, but they did consent via an agreement to disclose another Transfer of Value over the course of the year, Pfizer will report partial disclosure for these Healthcare Professionals.

4.9.3 If there is a Transfer of Value made to a Healthcare Professional where the Healthcare Professional has not provided consent at the time of contracting with Pfizer, Pfizer's position is that all Transfers of Value to this individual made in the reporting period are reported in the "aggregate" section of the report. This means that no Transfer of Value is disclosed under the name of the Healthcare Professional, but is disclosed as part of the sum of all Transfers of Value to any Healthcare Professional.

4.9.4 For 2015 cross border Transfers of Value, Pfizer has endeavoured to collect consent, from the individual Healthcare Professionals concerned, but where this has not been possible Pfizer will disclose the Transfers of Value in the "aggregate" section of the report.

4.9.5 Any consent which is withdrawn will result in the report being updated within 14 days in accordance with the ABPI Code of Practice requirement. If a Healthcare Professional revokes consent for any activity, Pfizer's position is that all the Transfers of Value in the reporting period for the relevant named individual are moved from the 'individual named disclosure' section of the report to the "aggregate" section of the report. This means that the Transfers of Value will no longer be disclosed under the name of the Healthcare Professional, but as

part of the sum of all the Transfers of Value to any Healthcare Professional who did not provide consent to the disclosure of at least one Transfer of Value during the reporting period.

- 4.10 Over-the-counter medicines (OTC):** OTC medicines are out of scope for this report.
- 4.11 Transfers of Value from Pfizer legal entities in other countries (cross border Transfers of Value):**
This report includes Transfers of Value to Healthcare Professionals and Healthcare Organisations who are residents of the UK. This includes all Transfers of Value (direct and indirect) made by any Pfizer affiliates and Regional Teams in the 33 European countries included in the EFPIA disclosure code and Global Teams. Pfizer will also collect and disclose direct Transfers of Value made by Pfizer affiliates in non EFPIA countries.
- 4.12 Currency:** Transfers of Value are reported in British Pounds. Transfers of Value made in a different currency were converted to British Pounds when this report was created. The Pfizer standard exchange rates for the Transfers of Value day of payment were applied.
- 4.13 Value Added Tax (VAT):** Treatment of VAT depends on the Transfer of Value. Where Pfizer hasn't claimed the VAT back, we disclose the gross i.e. including the VAT. Where Pfizer has claimed the VAT back, we disclose net value.
- 4.14 Valuation of in kind donations, grants and Medical and Educational Goods and Services (MEGS):**
The rate for colleague time given as part of a MEGS for activities such as meeting facilitation or project management has been valued at £35 per hour. This figure is based on the lower end of the industry standard hourly rate for these types of activities provided by a third party vendor, because Pfizer does not need to factor in overhead costs, and additions such as pension and superannuation. Non-financial MEGS are valued using the estimated cost of procuring the services/goods from an external source or provider.
- 4.15 Country Unique Identifier:** All Healthcare Professionals and Healthcare Organisations are assigned a country unique identifier number to ensure all Transfers of Value are correctly assigned. This information is not disclosed in the final report
- 4.16 Self-Incorporated Healthcare Professional :** Transfers of Value to a self-proprietor or to an individual Healthcare Professional legal entity (a Limited company) is reported at an individual Healthcare Professional level (provided consent has been given) if the Transfer of Value is categorized as 'fees for services and consultancy and/or related expenses', 'registration fees and/or travel and accommodation'. Transfers of Value to a self-proprietor or to an individual Healthcare Professional legal entity (a Limited company) is reported at an individual Healthcare Organisation level if the Transfer of Value is categorized as 'donations and grants', 'joint working' or 'sponsorship agreements'
- 4.17 Transfers of Value to Healthcare Professionals not included in the disclosure report:**

Where Pfizer has paid travel or accommodation directly on behalf of a Healthcare Professional to attend a Pfizer organised meeting, and the Healthcare Professional is not able to attend the meeting, the Transfer of Value will not be reported.

Where Pfizer has pre-paid registration fees on behalf of a Healthcare Professional to attend a third party meeting, and the Healthcare Professional is not able to attend the meeting, the Transfer of Value will not be reported.

4.18 Transfers of Value to Healthcare Professionals where there is a zero fee for the consultancy:

Pfizer will disclose any expenses (e.g. travel, accommodation) paid to a Healthcare Professional associated with consultancy work the Healthcare Professional has completed, even if the Healthcare Professional has not asked for a fee for the consultancy work completed.

4.19 Indirect Transfers of Value to Healthcare Professionals via a third party

Where Healthcare Professionals have requested that their payment is made to a third party such as a charitable organisation, employer etc. the Transfer of Value has been reported as being received by the Healthcare Professional (this is an EFPIA and ABPI Code of Practice requirement). Pfizer will publish additional transparency information on www.pfizer.co.uk. This will include information about Transfers of Value made to a third party at the request of the Healthcare Professional.

4.20 Transfers of Value made to informal groups which are not formal Healthcare Organisations:

Transfers of Value made to Healthcare Organisations which aren't a legal entity, in return for putting up a promotional stand, will not be reported.

4.21 Transfers of Value to a Healthcare Organisation for catering:

Where Pfizer has made a Transfer of Value to a Healthcare Organisation for catering services or to the catering subsidiary of the Healthcare Organisation, in return for putting up a promotional stand, this Transfer of Value will be reported in corporate sponsorships.

4.22 Transfers of Value to a Healthcare Organisation for Fees for Service:

Activities such as hiring the conference facilities of a Healthcare Organisation would be categorized as fees for service.

4.23 Transfers of Value to patient organisations:

Patient organisations who deliver a medical service for the NHS e.g. MacMillan, are in scope for Healthcare Organisation disclosure (these Transfers of Value will also be captured in the Patient Group Disclosure report).

4.24 Healthcare Professionals employed by Pfizer Ltd

We do not disclose salaries paid to Healthcare Professionals employed by Pfizer. Pfizer would not disclose any support provided by Pfizer to a Pfizer employee who is also a Healthcare Professional, to attend a 3rd party meeting; it would be deemed that the Pfizer employee attended the meeting for professional reasons related to their Pfizer employment.

4.25 3rd party vendors who make a Transfer of Value on Pfizer's behalf

Where Pfizer Ltd has engaged a third party vendor to manage travel logistics for Healthcare Professionals to attend a Pfizer organised meeting, the expenses paid to the Healthcare Professional will not be disclosed in the 2015 financial year if the meeting has not been reconciled and closed down by the 3rd party. In these exceptional circumstances, the expenses will be reported in the following calendar year (2016).

4.26 Joint Working

Where Pfizer has worked with more than one organisation for a joint working project, the total Transfer of Value given to those organisations by Pfizer, will be split equally between the organisations involved, unless the project outline in the contractual agreement states otherwise.

4.27 Compassionate Use

Pfizer does not disclose a Transfer of Value for any medicines provided on request to Healthcare Professionals for individual patients which are for Compassionate Use.