EFPIA Disclosure Code
Self-certification scheme
The Netherlands

Healthcare professionals and organisations with whom Pfizer (the Netherlands) works provide the Pharmaceutical Industry with valuable, independent and expert knowledge derived from their clinical and management experience. As owners of scientific knowledge and experts in medicinal products, pharmaceutical companies can be a unique resource to the healthcare systems and providers, which will ultimately benefit the patients.

Throughout the medicines life cycle pharma companies work with scientists and healthcare professionals. These collaborations are essential in addressing patient needs. Industry and health professionals collaborate in a range of activities from clinical research to sharing best clinical practice and exchanging information on how new medicines fit into the patient pathway.

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions of their member companies with healthcare professionals and organisations meet the high standards of integrity and transparency. Building greater transparency to the relationships between pharmaceutical companies and HCPs/HCOs aims to building understanding of the collaboration and recognition of its value to patient care.

Pfizer (the Netherlands) hereby confirms that its disclosures report transfers of value to HCPs and HCOs made in 2018 have been reported and complies with the local disclosure regulations which are aligned with EFPIA Disclosure Code provisions following key principles:

Disclosure quality

Pfizer (the Netherlands) certifies that:

- Its disclosures are made in The Netherlands.
- This disclosure includes direct and indirect Transfers of Values (ToVs) with definitions in line with the requirements of the EFPIA Disclosure Code.
- Its method of disclosure is agreed upon between the CGR and EFPIA and therefore there is no local methodological note explaining decisions related to the disclosure, however there is a local procedure which explains decisions related to the disclosure.

Methodology used for the collection and organisation of ToVs is in line with the EFPIA Disclosure Code's requirements and applicable codes

Pfizer (the Netherlands) certifies that:

- Data collection complies with the requirements of the EFPIA Disclosure Code;
- Actions were taken to ensure individual disclosure for HCPs and HCOs' transfer of values (each as defined in the EFPIA Disclosure Code), where applicable. Note: for The Netherlands there is no need to ask consent since the CGR is binding for HCOs/HCPs and the

pharmaceutical industry. If an HCP/HCO accepts ToV from Pfizer, he/she automatically consents for disclosure.

Aggregate disclosures are limited to Research and Development Transfers of Value and such Transfers of Value that cannot be disclosed on an individual basis for legal reasons

Pfizer (the Netherlands) certifies that aggregate disclosure is limited to the following topics:

- Research and Development Transfers of Value (as defined in the EFPIA Disclosure Code);
- Transfers of Value to Recipients that have opposed to the publication on grounds of the protection of their private data; *Note 1: Note that for The Netherlands the local regulation of disclosure are mandatory for Healthcare Professionals too so no aggregated reporting is applicable since all are disclosed by individual Healthcare Professional.*
- If an HCP or HCO (where applicable) has provided consent to individual disclosure only in respect of part of the Transfers of Value he/she/it received, all Transfers of Value to such HCP or HCO (where applicable) are being disclosed in the aggregate. (See note 1).

Ensuring compliance with Data privacy Obligations

Pfizer (the Netherlands) certifies its disclosure complies with the Data Privacy obligations

Data quality and Integrity

Pfizer has policies and procedures governing how and under what circumstances payments or other exchanges of value may be made to HCPs and institutions including how these activities/payments are to be captured within Pfizer financial systems. These policies and procedures are outlined in " My Anti-Corruption Policy and Procedures"

The process to provide the disclosure report requires data extraction from several transactional systems and the implementation of manual data collection across Pfizer Inc. The electronic and manual data retrieval processes are complex and pivot on colleague adherence to current policies and third party vendors providing accurate data.

The Transparency team within the Pfizer Medical Division is accountable for ensuring that data is appropriately extracted, loaded in the Transparency Repository System, stewarded and organized as outlined in the Data Stewardship playbook (available in this folder) and posted to Pfizer's website (https://www.pfizer.nl/zorgthema/transparantieregister-zorg) and central national platform (www.transparantieregister.nl).

However, the responsibilities for ensuring transactions are accurate extend throughout the organization. The responsibilities are shared and begin with each colleague who initiates an HCP/institution-related transaction adhering to established processes which outline appropriate documentation and expense classification. Business Process Owners for each transaction types (e.g., speaker programs, consulting) must also execute their duties, which include ensuring processes are followed, reporting any known violations and correcting known errors or misclassifications as soon as possible. The processes and responsibilities for these front end requirements are outlined in various corporate and divisional SOPs throughout Pfizer.

DocuSigned by:
W. Rieb
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Name: Wiebke Rieb
Function: Country Manager, Netherlands
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