

**EFPIA Disclosure Code**  
**Self-certification scheme**  
**The Netherlands (Pfizer BV and Pfizer PFE BV)**

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.

Pfizer The Netherlands believes that interactions between pharmaceutical companies and healthcare professionals – either directly or through healthcare organisations – have a profound and positive influence on the quality of patients treatments and value of future research.

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions meet the high standards of integrity that patients, governments and other stakeholders expect.

Because the society has a growing expectation that interactions between corporations & healthcare professionals and organisations are not only conducted with integrity but are also transparent, Pfizer The Netherlands discloses transfers of values made to healthcare professionals and organisations in due respect of EFPIA Disclosure code's requirements.

All individual data published in our disclosure has been made with the support of healthcare professionals and organisations.

Pfizer The Netherlands complies with the local disclosure legislation or regulations, where applicable and commits to apply EFPIA Disclosure Code provisions and especially the following key principles.

**Disclosure quality (fair and complete)**

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 are in line with EFPIA Code's requirements**

Pfizer The Netherlands certifies that:

- Data collection complies with the requirements of the EFPIA Disclosure and with the requirements of local legislation, especially in the consent collection.
- Actions were put in place to gain consent from HCPs (and HCOs 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 R&D and ToVs where information cannot be disclosed on an individual basis for legal reasons**

Pfizer The Netherlands warrants that aggregate disclosure is limited to the following topics:

- Research and Development Transfers of Value as defined in the EFPIA Disclosure Code.
- Other Transfers of Value are disclosed based on local regulations (Consultancy Fees/Expenses, Contribution to Costs of Events, Donations and Grants).

### **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 and posted to Pfizer's website <http://www.pfizer.nl/transparantieregister> and the central national platform <http://www.transparantieregister.nl/nl-NL/Raadpleeg-het-Transparantieregister>.

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.

### **Pfizer The Netherlands (Pfizer BV & Pfizer PFE BV)**



Name: Wiebke Rieb

Function: Country Manager

Date: ~~23.5.2018~~

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