

EFPIA Disclosure Code

Self-certification scheme Russia

Healthcare professionals and organisations with whom Pfizer Russia 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 pharma companies and HCPs/HCOs aims to building understanding of the collaboration and recognition of its value to patient care.

Pfizer Russia hereby confirms that its disclosures report transfers of value made in 2017 conforming to the EFPIA Disclosure Code provisions in application of the following key principles:

Disclosure quality

Pfizer Russia certifies that:

- Its disclosures are made in each country where it operates;
- Its disclosures include direct and indirect Transfers of Value, as defined in the codes and associated guidance issued by EFPIA;
- Its Methodological Note describes the process it has followed in order to compile the data hereby disclosed.

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

Pfizer Russia certifies that:

- Data collection complies with the requirements of the EFPIA Disclosure Code;
- Actions were taken to seek consents from HCPs.

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 Russia 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;
- If an HCP 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 are being disclosed in the aggregate.

Seeking the consent of Recipients

Pfizer Russia certifies that it has used its best efforts in seeking consent from HCPs, where applicable, for individual disclosure.

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 HCOs 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 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.ru/responsibility>

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/HCO-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.



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