Overview:

Pfizer’s Environment, Health and Safety (EHS) Management Systems (EHSMS) framework is risk-based and designed to meet Pfizer’s continually evolving and dynamic business and operating model. The risk-based approach offers flexibility, within defined boundaries, for alternative solutions to risk management needs. The framework recommends mandatory controls where there is potential for high consequence events and also presents risk control measures that are proven effective and judged to be technically best.

Pfizer’s Global EHS team maintains a series of documents detailing the key components of Pfizer’s EHSMS. These documents are designed to protect the environment and the health and safety of our colleagues and the communities in which we operate by establishing consistent risk thresholds while allowing our operations flexibility to make decisions to manage risk most effectively. The following diagram illustrates the EHSMS documentation structure:
Pfizer’s Corporate EHS Policy is positioned at the top of the structure. The policy establishes the company’s overall commitment to protect the health and safety of colleagues and protect the environment, while achieving high standards of Environmental, Health and Safety performance.

At the next level, the Systems Manual presents a high level overview of the EHSMS.

Pfizer’s EHS Standards make up the third tier of the documentation structure. The Standards are arranged into three categories:

<table>
<thead>
<tr>
<th>Management Systems Standards</th>
<th>These Standards provide the framework for EHS risk management, incorporating many key elements to successful EHS management such as regulatory compliance, risk assessment, communication, self audit, and senior leadership engagement.</th>
</tr>
</thead>
<tbody>
<tr>
<td>100 Series</td>
<td></td>
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<tr>
<td>Risk Topic Standards</td>
<td>This group of documents sets expectations for management and control of many important EHS programs including workplace safety, occupational hygiene, fire and life safety, and environmental impact reduction. These Standards describe Pfizer’s performance expectations for these programs and include mandatory requirements where appropriate.</td>
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<tr>
<td>200 Series</td>
<td></td>
</tr>
<tr>
<td>Program Standards</td>
<td>These Standards address key program areas across Pfizer businesses such as office safety, fleet operations, contractor safety and EHS risk from suppliers of materials and services.</td>
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<tr>
<td>300 Series</td>
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</table>

Pfizer leadership is accountable for ensuring compliance with EHS Standards. Leadership teams are responsible for assigning responsibilities and providing resources to ensure compliance with performance expectations.

Business units, divisions and facilities are responsible for implementing EHS Standards applicable to their operations (by referring to the Scope and Applicability sections of the Standard).

Implementation Documents make up the fourth and final tier of the structure. These documents, known as Recommended Practices, Reference Documents and Global Standard Operating Procedures (SOPs), describe practical and recommended methods for conforming to EHS Standards.

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Recommended Practices (RPs) are:

- Developed for situations that present significant risk to Pfizer, where, if not well-managed, the consequences of an incident would be severe (e.g., fatality, significant health impact, release, fire/explosion leading to significant liability, harm to reputation, or business interruption) and where approaches/techniques are established and proven to be effective
- Created by technical experts and subjected to a formal review and approval process
- Mandatory (subject to the exception criteria below) because they are the accepted method for managing key risk areas

Exception: Operations wishing to adopt an alternative to a Recommended Practice must employ a risk based decision making (RBDM) process to verify that the alternative achieves comparable control of risk.

Reference Documents are:

- Provided by the relevant Communities/Networks of Practice as aids to program implementation for particular EHS Standards
- Non-mandatory; operations are not required to implement program elements and/or performance requirements included in Reference Documents

Global SOPs are detailed specifications that support Global EHS/Risk Management programs.

Pfizer’s Management Systems Standards (Series 100) are based on and aligned with the Plan-Do-Check-Act model shown in the following diagram. These Standards require facilities to:

- Assess and prioritize risks
- Establish goals to address highest priority risks and opportunities
- Document the processes used to accomplish those goals
- Evaluate progress and adjust processes as needed to address issues and ensure continual improvement

The Plan-Do-Check-Act model of Pfizer’s EHSMS conforms to external management system recognition standards such as ISO 14001, OHSAS 18001, and OHSA VPP and is considered at least equivalent to these standards.
Each component of the system is designed to work interdependently in an integrated manner that continually reinforces the common objective of improving EHS performance. To ensure sustainability of the EHSMS, Pfizer facilities are required to establish formal processes for core system components and to evaluate their effectiveness regularly.