



## ETHICS

We are committed to upholding the highest ethical standards in every aspect of our business. We systematically scrutinize our internal practices and have implemented procedures for taking immediate action when we identify potential violations.

We also offer an Open Door Policy and anti-retaliation protections to ensure that all Pfizer colleagues have a safe mechanism for reporting potential violations or concerns. Our training programs and new organizational structures have been developed to go beyond compliance to help ensure the highest standards of ethical behavior throughout the company.

### Compliance

Pfizer's Compliance Program, established under the direction of Pfizer's Board of Directors, supports Pfizer's unyielding commitment to high standards of legal and ethical conduct. Strong ethical performance is a key value at Pfizer, enabling us to achieve our mission, and minimizing the potential negative business and reputational impact of noncompliance. The Chief Compliance Officer (CCO), who is a member of the Executive Leadership Team and reports to the CEO, and staff provide oversight and guidance to help ensure compliance with applicable laws, regulations and company policies. In addition, we have a robust internal audit group, reporting on a separate line to the Chief Financial Officer, and having a direct reporting relationship with the Audit Committee of the Board. Both the CCO and the head of Internal Audit have wide remit to investigate any and all compliance issues. As part of our commitment to continuous improvement, we regularly review our compliance program to ensure that it remains best in class.

Colleagues worldwide are trained and tested on Pfizer's Code of Business Conduct, known as the "Blue Book," which explains Pfizer's commitment to maintaining high standards and performing with integrity. Pfizer has also made considerable investments to prevent bribery and corruption. Our International Anti-Bribery and Anti-Corruption Corporate Procedure, which is designed to prevent and detect violations of the U.S. Foreign Corrupt Practices Act and its foreign law counterparts, requires the adoption of local procedures and training of appropriate colleagues. We also have established reporting mechanisms which include a compliance helpline available in 70 languages and Web reporting tools, where available, which allow colleagues around the world to raise concerns and seek guidance. Where permitted by law, suspected compliance issues may be reported anonymously. These efforts support our expansion globally and help make certain that our business is conducted consistently and ethically around the world.

70

languages available on  
the compliance helpline



## 2010 Highlights

2010 marked the launch of our signature compliance campaign, “It’s Mine,” which reinforces the importance of each and every colleague taking accountability for performing with integrity.

In September, as part of “It’s Mine,” a Business Leaders’ Compliance Forum was held in New York for approximately 350 of the Company’s most senior leaders.

We were recognized by Ethisphere as a Verified Compliance Leader, based on a thorough review of Pfizer’s compliance systems and commitment to ethics and integrity.

The 2010 Integrity Training Program for colleagues worldwide consisted of over 40 distinct training campaigns, delivered using innovative and interactive online learning tools and complemented by live training.

## Resources

### For more about Pfizer’s Political Action Committee Report

View Pfizer Political Action Committee Report

[GO TO THE SITE](#)

## Public Policy

Engaging in public policy is a crucial dimension of our efforts to create an enabling environment to improve access to quality medicines and health care. In the U.S. and around the world, current health care systems face genuine challenges, and we strongly believe that there is long-term value to creating systems that are more efficient, stable and performance oriented.

As a highly regulated industry, we believe that public policy engagement, including lobbying, is an important and appropriate role for companies in open societies, if such engagement is conducted in a legal and transparent manner. We comply with all applicable lobbying registration and disclosure laws. To demonstrate our commitment to transparency, we also publicly disclose our Pfizer Political Action Committee and corporate political contributions and grants for health care education on our Web site.

### Political Contributions and Lobbying

We believe that public policy engagement includes supporting policy positions that improve our ability to do business in a commercially and socially sustainable manner. We recognize that it is important that our engagement be conducted in a legal and transparent manner.



Our political contributions are guided first and foremost by federal and state campaign finance laws in the U.S. We also have a Corporate Procedure for Political Contributions by Pfizer Inc to make certain that the use of shareholder resources is in strict compliance with election laws and regulations around the world. The procedure restricts the use of such resources to support only federal and state candidates, political parties and political committees.

We recognize that compliance needs to be supported by information. Pfizer reports quarterly on lobbying expenses. In 2010 our total reported U.S. federal lobbying expenses were \$13,330,000. We also publicly disclose, twice yearly, the corporate political and employee contributions made through the Pfizer Political Action Committee, a nonpartisan organization that provides opportunities for colleagues to participate more fully in the U.S. political process. A full report on our activities is available in the Lobbying and Political Contributions section of our Web site.

Pfizer has also voluntarily signed onto the European Commission’s new register of interest representatives. Through the register, we declared 2010 expenses related to interest representation of 750–800,000 euros. This figure was broadly in line with the expenditures of other companies of similar size and scope.

## Ethical Sales and Marketing

We are committed to responsibly promoting our products. We believe that it is important to educate patients and providers about health care treatments. Sales and marketing practices provide accurate and balanced information, so that physicians who prescribe our medicines make decisions based upon patient needs and the clinical value to individual patients. We follow an approach to sales and marketing that begins and ends with integrity in our business practices and transparency in our reporting about these practices.

### Interactions with Health Care Professionals

Working with health care professionals is essential to delivering the medicines that improve people’s health and well-being. The medical community helps us research our medicines and highlight areas of greatest need for innovative treatments. We also retain health care professionals in order to help educate their peers about health conditions and share information about our medicines. We are committed to conducting our work with these health care professionals with the utmost integrity, and we remain vigilant in looking for opportunities to strengthen our practices and procedures. Compliance training in interaction with health care professionals is integral to every colleague’s training and is expanded in the case of those who work directly with the medical community.

## Resources

### For more about Policies and Practices

Learn more about the policies and practices that govern how we work together.

[GO TO THE SITE](#)

### For more about Sales and Marketing

Learn more about the policy on Interactions with Health Care Professionals.

[GO TO THE SITE](#)

### For more about our 2010 Payment Report

Learn more about the policy on Payments to Health Care Professionals.

[GO TO THE SITE](#)



### **Disclosing Payments to Health Care Professionals**

Transparency in our relationships with health care professionals is of paramount importance to our business. In 2010 we published on our Web site Pfizer's payments and the value of non-cash items provided to licensed U.S. health care professionals, including in connection with speaking engagements and clinical research activities. Our disclosure of research payments further identified major academic institutions involved with clinical trials ongoing as of July 1, 2009, and the principal investigators on clinical trials beginning on or after that date. We are committed to ensuring that these payments and other transfers of value are disclosed in an accurate, clear and consistent manner. We do not pay health care professionals for prescribing our medicines or as an inducement for promoting our medicines, vaccines or nutritional products.

Pfizer is the first biopharmaceutical company to report payments for conducting Phase I–IV clinical trials, in addition to disclosing payments for consulting and speaking. We believe that sharing this information will help the public understand the full breadth of the important collaborative work done by industry, academia and health care professionals to advance health.

We also believe it is appropriate and ethical to fairly compensate health care professionals for the work they do on our behalf. We have robust compliance policies in place to ensure that all payments to health care professionals and research institutions constitute fair market value and are appropriate to the services performed.

### **Direct-to-Consumer Advertising**

Responsible consumer advertising has proven value to help consumers engage in more informed conversations with their health care providers and thereby achieve better health outcomes. In all of our consumer advertising, we adhere to FDA regulations and guidelines. We follow strict internal standards that have been developed to ensure the information we share with consumers is evidence-based, balanced, easy to understand and directs people to engage their health care professional.

Our direct-to-consumer (DTC) practices are carefully designed to bring needed education to patients about prescription medicines, treatments they can only obtain with a prescription from their health care professional. We engage in regular consultation with health care professionals, patients and the groups that represent them to continually evolve and improve our approach to advertising. We strictly adhere to and exceed industry standards as outlined by the PhRMA Guiding Principles on Direct-to-Consumer Advertising About Prescription Medicines. And we continue to examine our internal protocols to ensure our DTC standards keep pace with industry standards, guidance, law and regulation.



Some highlights of our approach include systematic engagement with health care professionals to get their feedback on new campaigns early in our development process. We commit to ensuring clarity and transparency in our advertising which makes use of health care professionals. In addition, our CEO and Chief Compliance Officer sign an annual certification pledge to uphold the PhRMA Principles. We voluntarily submit our new TV advertising to the FDA for review prior to airing and educate physicians about a new product for at least six months after product approval and before introducing branded broadcast and print advertisements, so that physicians are equipped with accurate information to discuss new medicines with patients.



languages in which  
Pfizer's Code of  
Conduct is available

## Human Rights

We strive to respect human rights in all of our business activities. We fully support the principles contained in the Universal Declaration on Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. Pfizer is a signatory of the United Nations Global Compact and we support its Ten Principles on human rights, labor, environment and anti-corruption.

As a global company, we operate in complex economic, social and political environments. These growing complexities bring with them an enlarged role for us in ensuring human rights within our operations and working for human betterment through our increasingly broad global presence.

Pfizer's efforts to respect human rights focus on four key areas:

- Access to Health
- Employees
- Clinical Trials
- Supply Chain



## ACCESS TO HEALTH

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We believe that people should have access to the health care they need. While governments have the primary responsibility to provide this, we embrace the unique role Pfizer can play in promoting better health around the world. Our commitment is embodied in the many approaches we have developed to improve access to medicines and strengthen health care systems for underserved people.

We engage regularly in productive dialogue with key stakeholders in order to continually refine our access strategies and ensure their successful implementation within the broader system of health initiatives led by government and other players. Our access strategies leverage Pfizer's core capabilities in R&D and health care systems in order to improve affordable, accessible and quality care for underserved populations in developing and developed countries. These strategies include building local capacity, implementing appropriate pricing models, expanding our product offerings, and developing relevant partnerships that bring unique capabilities to the challenge of expanding access.





## EMPLOYEES

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We are committed to upholding and respecting the fundamental human rights of our employees as enshrined in the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

We have ongoing training initiatives to ensure that human rights of employees are respected at every level within the organization, and throughout the many countries in which our colleagues operate. Our trainings demonstrate a commitment to workforce diversity and equal opportunity. This includes annual training and certification for employees on the Pfizer Code of Business Conduct, covering issues such as equal opportunity and nondiscrimination, as well as actions to take in the event of discrimination and/or harassment in the workplace. Managers are responsible for communicating and enforcing our equal opportunity policy. Each operating unit monitors and reports on its performance in the area of equal opportunity.



### Resources

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#### For more about Pfizer's Code of Conduct

Download Code of Conduct

➤ [DOWNLOAD PDF](#)



## CLINICAL TRIALS

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We conduct clinical trials globally with strict adherence to the highest ethical and scientific standards.

Pfizer has run trials in over 60 countries. We only place trials in markets where the investigational medicine will be made available, if it is shown to be safe and effective, and only where there is a qualified pool of physician-investigators, sufficient medical infrastructure to support quality research, and a sufficient number of patients who are likely to be interested in participating. Increasingly, this includes countries in the developing world. Our policies and process require that informed consent, independent ethics review, post-study care, and the use of placebos conform to established international ethical standards. In an effort to continually strengthen clinical research infrastructure, we have developed a certification program for our clinical research staff and contractors, with over 1,000 colleagues and contractors now having successfully completed this certification program.



### Resources

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#### **For more about Conducting Clinical Trials**

Visit the Conducting Clinical Trials section of this Web site.

➤ [GO TO THE SITE](#)

#### **For more about Human Subject Protection**

View Pfizer policies, positions and case studies.

➤ [GO TO THE SITE](#)



## SUPPLY CHAIN

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Our commitment to human rights extends beyond our workforce to include the significant risks that can exist across our global and complex supply chain.

We are a founding member of the Pharmaceutical Supply Chain Initiative (PSCI), which promotes supplier adherence to five PSCI principles: ethics, labor, health and safety, environment and management systems. As a steering committee member for this group, Pfizer has played a key role in driving implementation of the group's principles both throughout our own company's supply chain and throughout the supply chains of the pharmaceutical industry as a whole.



### Resources

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#### **For more about Manufacturing and Supply Chain**

Visit the Manufacturing and Supply Chain section of this Web site.

➤ [\*\*GO TO THE SITE\*\*](#)