Committed to
COMPLIANCE

Conducting ourselves with integrity helps us earn the trust and respect of the people we serve.
Dear Colleagues,

At Pfizer, we all are responsible for understanding the important legal and ethical issues that affect our business and for acting with integrity at all times. Integrity means more than just complying with the law. It is one of Pfizer’s core values. It reflects who we are as a company and as individuals. Conducting ourselves with integrity helps us earn the trust and respect of the people we serve.

This Code of Conduct (commonly known as the “Blue Book”) and its companion website integrity.pfizer.com are essential resources for all colleagues. They outline Pfizer’s Policies on Business Conduct and identify the people who can answer any questions you might have about compliance-related issues. I am asking that you familiarize yourself with the Blue Book and bookmark the website as a reference to help ensure that you remain in compliance with all policies and procedures that apply to your work.

Please know that all of Pfizer’s leaders are available to you if you have any concerns related to company practices or regarding a colleague. Seeking advice, raising concerns, or reporting misconduct cannot and will not be held against you. Our open door and anti-retaliation policies are in place to encourage and protect colleagues who raise concerns.

Our commitment to doing the right thing, which means complying with both the spirit and the letter of the laws that govern our industry, gives us a competitive advantage. Acting with integrity depends on each of us giving our full commitment. The responsibility lies with all of us — it’s mine, it’s yours, it’s all of ours.

Ian Read
Chairman & Chief Executive Officer
0 own...the business

Seize opportunities to think differently, take risks and be accountable; try something new

W win...in the marketplace

Advocate and drive long-term, aligned strategies that advance our mission and shape the industry

N no jerks...let’s discuss behaviors

Confront corrosive, self-serving and mean-spirited behaviors; it’s everyone’s responsibility

I impact...results

Deliver on commitments with speed, decisiveness and integrity

T trust...in one another

Invest in candid and constructive debate to ensure each other’s success; it’s time for straight talk
At Pfizer, we all are responsible for understanding the important legal and ethical issues that affect our business and for acting with integrity at all times. Integrity means more than just complying with the law. It is one of Pfizer’s Values. It reflects who we are as a company and as individuals. Conducting ourselves with integrity helps us earn the trust and respect of the people we serve.
Owning Integrity

Our Commitment

Pfizer counts on you to uphold our reputation and high standards by taking ownership of performance with integrity.

- **Know the standards, and live by them.** By knowing, understanding and acting in accordance with Pfizer’s Values, applicable laws and Company policies, each of us can serve as a role model.
- **Ask questions.** You are expected to be familiar with the laws and policies that apply to your role. If you have questions, ask your manager or a member of the Legal or Compliance Division.
- **Raise concerns.** If you believe someone may be violating a law or policy, raise your concern. Pfizer management is dedicated to ensuring that our standards are upheld and any concerns are addressed. Retaliation for raising a concern in good faith is strictly prohibited.
- **Always act with integrity.** You are never permitted to violate a law or policy, nor should you ever feel encouraged or pressured to do so.

A Commitment to INTEGRITY

We demand of ourselves and others the highest ethical standards, and our products and processes will be of the highest quality.
<table>
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<th><strong>At-a-glance: How do I ask questions, present ideas or raise concerns?</strong></th>
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| **Open Doors**  
Discuss questions, ideas and concerns without fear of reprisal. Many people are available to help; consult the person with whom you feel most comfortable. |
| Contact:  
- Any manager  
- Your Compliance or Legal Division contact  
- Human Resources |
| **Compliance Division**  
Contact the Compliance Division directly to ask questions, present ideas or raise concerns. |
| Contact:  
- Your Compliance Division contact  
- corporate.compliance@pfizer.com  
- 1-212-733-3026  
- 1-917-464-7736 (secure fax)  
- 235 East 42nd Street, New York, NY 10017 |
| **Compliance Helpline**  
Report concerns through the Helpline web-reporting tool or phone line.  
Anonymous reporting is available. |
| Contact:  
- pfizer.alertline.com  
- 1-866-866-7349 |
| **Pfizer’s Intranet**  
Find policies and procedures, It’s Mine resources, success stories, contact information and more. |
| Contact:  
- integrity.pfizer.com  
- policysource.pfizer.com  
- integrityprograms@pfizer.com |
How is compliance with Pfizer’s standards enforced?

Any violation of a law or Company policy may result in disciplinary action, including termination of employment (subject to applicable law), particularly if you:

- knowingly and intentionally violate law or policy;
- direct others to violate law or policy;
- fail to cooperate in a Company investigation of possible violations;
- retaliate against another colleague for reporting a concern or a violation; or
- fail to effectively monitor the actions of subordinates.

Our Standards

This Summary of Pfizer Policies on Business Conduct (the “Blue Book”) is a guide to the Company’s compliance structure and key standards. The Blue Book summarizes a number of corporate policies and procedures that govern doing business in a legal and ethical manner. All colleagues are subject to the laws and regulations of the country in which they work. Because Pfizer Inc. is a U.S. company, U.S. law also may apply to conduct outside the United States. In addition, all colleagues are responsible for understanding and following the Pfizer policies and procedures that apply to their roles and responsibilities.

If you are unclear about which standards apply to you, or how to comply with them, it is your responsibility to seek guidance; consult with your manager or contact the Legal or Compliance Division.

Pfizer also holds its vendors and contingent workers to high standards. They are expected to comply with all laws and all relevant policies that apply to their work conducted on Pfizer’s behalf.

Consequences of non-compliance with our standards may include:

For Our Company

Damage to Pfizer’s reputation, prosecution or fines, disclosure to government agencies, loss of business

For Our Colleagues

Prosecution, fines or imprisonment; disciplinary actions; damage to personal reputation; serious injury or illness

For Patients, Customers and the Public

Compromised product safety or efficacy, environmental risk, higher cost of medicines, loss of good faith and trust in dealings with Pfizer

For Our Investors

Loss of confidence in Pfizer and its products, loss of investment value, damage to Pfizer’s reputation for good corporate governance
Our Responsibilities

As a Pfizer colleague, you share the privilege and responsibility of upholding the Company’s reputation. You do this each time you act ethically and legally. There are situations in which making the right decision can be challenging. If you have a question or concern, reach out—there are many resources available to help you.

You are also responsible for raising concerns about risks to the Company as soon as you are aware of potential issues—ideally, before these risks become actual problems. By raising concerns, you give management the opportunity to address potential problems and protect the Company, colleagues and the public.

If you reasonably believe that a colleague or anyone else doing work on behalf of Pfizer has violated or may violate a law or Pfizer policy, you have a responsibility to report that information immediately to your manager, another manager, Human Resources, or the Compliance or Legal Division. Pfizer has Open Door, anti-retaliation and confidentiality policies to help protect you. Retaliation against any colleague who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited.

Whenever you are in doubt, it is best to raise your concern.

Personal Disclosure Requirements

If you have been excluded, debarred or suspended, or have become otherwise ineligible to participate in U.S. federal healthcare or procurement or non-procurement programs, you must disclose this immediately to the Compliance Division. You also must disclose if you are under investigation for certain criminal offenses, for which you may become excluded, debarred or suspended.

Which standards apply?

Reach out if you need help determining which laws (e.g., local, regional, extra-territorial), policies (e.g., local, divisional, global) or other standards may apply to your role. If you have any questions, contact your manager or the Legal or Compliance Division.
Pfizer’s Compliance Program

Pfizer’s compliance program is designed to support legal and ethical conduct throughout the Company.

The Chief Compliance and Risk Officer oversees Pfizer’s compliance program and, with the Compliance Division, works to address risk areas and ensure adherence to our standards.

Pfizer’s tiered compliance committee structure promotes leadership oversight and complements our embedded divisional and business unit compliance organization. Additional compliance support is provided by groups and individuals in areas such as legal, safety, audit, human resources, finance and corporate governance.

The Compliance Division has exclusive responsibility for investigating Referable Compliance Issues (RCIs)—significant potential, suspected or actual violations of law or policy. The Compliance Division determines the scope of investigations and may seek help in investigating RCIs from other individuals and groups. But no investigation into an RCI may begin without the express consent of the Compliance Division.

Referable Compliance Issues (RCIs)

RCIs are significant potential, suspected or actual violations of applicable law or Company policy that must be reported to the Compliance Division for investigation. Whether a matter is significant depends on the facts of the situation. Some considerations are:

» Was the action intentional or part of a pattern?
» Was the action criminal?
» Was a manager involved?
» Did the action expose colleagues or the public to dangerous health or safety risks?
» What are the potential consequences, including financial, operational, legal or public relations impact?
» What is the overall extent and severity of the violation?
» What is the nature of the law, regulation, policy or procedure involved?
» Is the violation the subject of investigation by a government or regulatory entity?

If you are unsure whether a matter is an RCI, contact the Compliance Division.
Pfizer’s Office of the Ombudsman

Pfizer’s Office of the Ombudsman provides an informal place where Pfizer colleagues can confidentially get information and guidance to help address and resolve work-related issues. Pfizer’s Ombudsman is independent and neutral, and is not an advocate for any party, but an advocate for fair process.

Pfizer’s Ombudsman supplements, but does not replace, other resources for issue resolution, such as management, Human Resources and the Compliance Division. If colleagues want to make a formal complaint, put the Company on notice of any claim or have an issue documented, they must use one of Pfizer’s other channels for reporting concerns, described elsewhere in this Blue Book.

While Pfizer’s Ombudsman provides assistance and guidance, any action taken is up to the colleague—except where the Ombudsman determines that there appears to be an imminent risk of serious harm or a potential violation of U.S. federal healthcare laws or FDA requirements, in which case the Ombudsman must take the issue forward if the colleague declines to do so.

You may use Pfizer’s Office of the Ombudsman when you:

- don’t know where or how to take an issue forward,
- aren’t sure if what you observed is unethical or violates law or policy,
- would like help identifying options for addressing workplace concerns,
- want a neutral sounding board to help evaluate options or
- want to talk off-the-record to a neutral professional who has extensive knowledge of Pfizer’s policies and practices before taking a formal step.

Contact the Office of the Ombudsman

1-855-PFE-OMBD (1-855-733-6623) or ombudsman@pfizer.com

For more information, visit: ombudsman.pfizer.com
Raising Concerns, Presenting Ideas and Asking Questions

At Pfizer, many channels exist for asking questions, presenting ideas and raising compliance or other concerns. When in doubt, reach out.

Open Door Policy

The foundation of our compliance program is openness, accessibility and discussion within the Pfizer community. Most issues can be resolved locally before they become problems for colleagues, the Company or the public. The Open Door Policy encourages colleagues to present ideas, ask questions and raise concerns—especially those of a legal or ethical nature, but also those relating to quality of work and the working environment. All managers are responsible for supporting this policy by maintaining an “open door” for colleagues who may reach out to them.

While we hope you feel comfortable discussing any matter with your manager, there may be times when you prefer to use another avenue for addressing issues. You should feel comfortable speaking with others, including:

- the next higher level of management,
- your operating unit head,
- any other manager in the Company,
- Human Resources,
- the Legal Division or
- the Compliance Division.

See Corporate Policy 702 on policiesource.pfizer.com for more information on the Open Door Policy.
Human Resources

Human Resources colleagues are available to listen to any concerns you may have. You may reach out to your local Human Resources representative, the Employee Relations Group or Corporate Human Resources.

The Compliance Division

You can contact the Compliance Division directly to report a concern, present an idea or ask a question:

- by email: corporate.compliance@pfizer.com
- by phone: 1-212-733-3026
- by secure fax: 1-917-464-7736
- by mail or in person: 235 East 42nd Street New York, NY 10017

You can use the Compliance Division website to find policies and procedures, It’s Mine resources, success stories and more. Visit integrity.pfizer.com.

The Compliance Helpline

The Compliance Helpline phone and web-reporting tools provide a way to report a concern, or get information or advice (where available and permitted by law). The Compliance Helpline is available by phone and web-reporting tool 24 hours a day, 7 days a week, 365 days a year, and is operated by specially trained third-party representatives. The reported information is provided to the appropriate Compliance group within Pfizer, which will take appropriate action. You can arrange to receive information about the Company’s response.

You are encouraged to identify yourself when using the Compliance Helpline; this helps ensure a thorough response or investigation. However, anonymous reports may be made through the Compliance Helpline in the United States.
If you believe that you or another colleague has been retaliated against for in good faith seeking advice, raising a concern, reporting misconduct or providing information in an investigation, you should contact the Compliance Division, the Employee Relations Group or Corporate Human Resources immediately. In the United States, you may also use the Compliance Helpline.

See Corporate Policy 702 on policiesource.pfizer.com for more information on the Open Door Policy.

I observed misconduct, but I’m afraid to report it because I fear retaliation. How will the Company protect me?

If you report misconduct honestly and in good faith, the Company will take action to protect you from retaliation. The specific steps taken will vary from case to case; they may include disciplinary action for anyone who engages in retaliatory actions, ongoing monitoring of the situation or other measures to protect you. It is important to raise any concerns about retaliation so that the Company can take appropriate steps.

Anti-Retaliation

Retaliation against any colleague who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Some examples of retaliation include: denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. If any individual, regardless of his or her role in Pfizer, retaliates against a colleague who has truthfully and in good faith reported a potential violation, Pfizer will take appropriate action—even where no violation is revealed after investigation. However, if an individual has intentionally made a false report, the Company will respond accordingly.
If I report a concern to the Compliance Division, can I expect a response?

Yes. The Compliance Division’s goal is to respond promptly to all questions and reported concerns. If your concern requires investigation, the Compliance Division will conduct the investigation and, where possible and appropriate, provide an update. However, because of confidentiality concerns, detailed information about matters will be shared only with those who “need to know.”

Confidentiality

It is essential that you feel secure when interacting with any element of the compliance program. Confidentiality will be maintained to the fullest extent possible. In some instances, however, it may not be possible to keep your identity confidential because of the nature of the investigation, the demands of conducting a thorough investigation or certain legal requirements. In the United States, colleagues concerned about confidentiality may consider making an anonymous report through the Pfizer Compliance Helpline.

If you are involved in a compliance investigation in any capacity (for example, as a witness or complaining party), you are expected to keep the details of the investigation confidential. Maintaining confidentiality helps to preserve the integrity of the process and protects the individuals participating in the investigation. Unless prohibited by local law, any exceptions to confidentiality must first be discussed with the Compliance Division.
Our Commitment

Pfizer is committed to acting with integrity in all aspects of our work, including research, development, manufacturing, distribution, marketing, government interactions, sales and promotion. We will comply with all applicable laws and regulatory requirements. We will act responsibly in our relationships with all stakeholders including healthcare professionals, patients, consumers, hospitals, academics, governments, regulatory entities, business partners, customers, suppliers and vendors. We are committed to conducting our business in a way that ensures fair competition and we will be honest and fair in all our business dealings.

A Commitment to QUALITY

Quality is ingrained in the work of our colleagues and all our Values. We are dedicated to the delivery of quality healthcare around the world. Our business practices and processes are designed to achieve quality results that exceed the expectations of all of our stakeholders.
Healthcare Laws and Regulatory Requirements

Pfizer is subject to many rules and regulations designed to protect patients and consumers, improve the quality of medicines and healthcare services and help eliminate fraud and improper influence on medical judgment.

We are committed to following the laws and regulatory requirements that govern our business, including the development, manufacturing, distribution, marketing, government contracting, sale and promotion of our products. Because Pfizer is a global company, the laws and regulatory requirements of one country may apply to activities in another country. In the event local laws and regulatory requirements differ from Pfizer policy, the stricter requirements generally apply.

You must be familiar with the standards that apply to your business and your role. If you have questions about which laws, regulations, policies or industry standards apply to your work, consult with your manager or contact a member of the Legal or Compliance Division.

Anti-Bribery and Anti-Corruption

Pfizer prohibits Pfizer colleagues and anyone acting on Pfizer’s behalf from offering, giving, requesting, accepting or receiving a bribe.

Government Officials

No colleague nor anyone acting on Pfizer’s behalf may ever offer, authorize or provide a payment or benefit that is intended to improperly influence—or even appears to improperly influence—a government official, or to gain any unfair business advantage.

Most countries in which we do business have laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to a government official when the payment

My Anti-Corruption Policy and Procedures (“MAPP”)

MAPP includes our corporate policy against corruption, as well as key principles and specific procedures, primarily for business interactions outside of the United States or involving non-U.S. entities or individuals. Colleagues are responsible for complying with MAPP and their regional standard operating procedure implementing MAPP.

Communicating Product Information Honestly

Trust is a significant part of our business. Medical professionals trust our research and results. Consumers trust the quality of our products. Shareholders trust that we will continue to seek to build shareholder value. That is why Pfizer is committed to providing timely and honest product information to patients, consumers, healthcare professionals and regulators worldwide to keep these stakeholders informed of the uses for our products, and the efficacy and safety data relating to those uses.

Want More Information?

integrity.pfizer.com   policysource.pfizer.com   Contact the Legal or Compliance Division
I travel around the world for work. If something is considered a “customary courtesy” in one country but may be viewed as a bribe in another, what does that mean for me?

You must not provide any payment or benefit of any kind to gain an improper business advantage. You must always comply with Pfizer policy and applicable laws. Visit the Anti-Corruption Program Office website at acpo.pfizer.com for more information, and contact the Legal or Compliance Division for guidance.

As a U.S. company, Pfizer Inc. and all of its subsidiaries and colleagues must comply with the FCPA, as well as with all local anti-bribery and anti-corruption laws. We must be particularly sensitive to bribery and corruption issues because governments are often both the regulator of our products and a major customer. We also interact regularly in various ways with healthcare professionals and scientists, many of whom are employees of public institutions and may be considered government officials.

**Commercial Individuals and Entities**

Pfizer also prohibits “commercial bribery.” Generally, commercial bribery is giving, offering, requesting, accepting or receiving something of value to or from an individual or company to secure an improper advantage in commercial conduct. Pfizer prohibits any colleague or anyone acting on Pfizer’s behalf from directly or indirectly engaging in any form of commercial bribery.
Anti-Kickback Laws

In the United States, the federal anti-kickback law prohibits offering anything of value in order to influence an individual’s decision to recommend, prescribe, endorse or purchase a healthcare product or service that is reimbursed by a federal healthcare program. This is to ensure that a healthcare provider’s treatment recommendation is not influenced by motives of personal gain or enrichment. Equivalent laws exist in many U.S. states and in many countries around the world.

U.S. Congress

In the United States, Pfizer is a registered federal lobbyist. As such, federal law prohibits any Pfizer colleague from providing anything of value to a Member or staff member of the U.S. House of Representatives or the U.S. Senate, and severely limits the ability of Pfizer to pay for travel expenses of U.S. House and Senate Members and staff. All Pfizer colleagues, regardless of location, must follow these restrictions.

Research and Development

Our purpose is to innovate to bring therapies to patients that significantly improve their lives. Our priorities are ensuring the safety and protecting the rights of those who take part in our clinical trials, and upholding the highest ethical, scientific and medical standards in all of our research activities. The science we perform at Pfizer is without value unless it rests on a fail-safe foundation of integrity.

All colleagues are responsible for acting in a manner consistent with Pfizer’s high expectations for quality and integrity in research and development, and for reporting concerns through any of the many channels available, including those described in this Blue Book.

Pre-Clinical Research. We are committed to conducting research in compliance with all applicable laws and regulations, as well as recognized international ethical guidelines such as Good Laboratory Practices (GLP).
In 2013, Pfizer became the first pharmaceutical company to earn accreditation from the Association for the Accreditation of Human Research Protection Programs (AAHRPP) for all phases of its global clinical development activities (certain units received accreditation in 2009).

**Conduct of Clinical Research.** All Pfizer-sponsored clinical studies are designed and conducted in accordance with applicable laws and regulations, as well as recognized ethical standards such as Good Clinical Practices (GCP). All clinical investigators are trained on study protocol and applicable scientific and ethical standards. We regularly audit and monitor clinical study sites and processes related to our clinical trials.

**Data Integrity.** Pfizer is committed to maintaining the integrity and quality of clinical data from our sponsored studies, to ensure that our submissions are built upon data of the highest quality. Our processes and procedures drive quality, compliance and performance at every stage.

**Public Disclosure.** We recognize the importance of making clinical studies and results available. We register certain studies and post basic results on clinicaltrials.gov. We are committed to the development of publications that report the results of Company-sponsored clinical research studies accurately and objectively, and to the disclosure of funding and editorial support.

**Human Subject Protection.** Our policies and procedures aim to ensure respect for the health, well-being and safety of research participants as well as for the culture, laws and regulations of the countries in which studies are conducted. Our interventional trials adhere to globally recognized principles of international ethics and are prospectively reviewed by a qualified Institutional Review Board or Independent Ethics Committee. Many of our trials use independent data monitoring committees to help ensure patient safety, in addition to internal reviews conducted by our physicians and safety professionals.

**Animal Welfare.** We are committed to conducting our animal research in a responsible, humane and ethical manner. Pfizer supports the development and adoption of novel, non-animal test methods for assessing the safety of new products that can reduce, replace or refine the use of animal testing. For those new products that require animal testing, we maintain high standards of animal care and welfare consistent with or exceeding those required by law.

See Corporate Policy 901 on policysource.pfizer.com for more information on animal welfare.

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**Additional resources**

ESOP portal: Policies and procedures on research and development

See Corporate Policies 201 and 205 on policysource.pfizer.com for more information on our commitment to integrity and reporting concerns.

www.pfizer.com/research

www.pfizer.com/development
Manufacturing and Supply Quality

Our reputation is built on trust. Patients, consumers and others rely on Pfizer products to improve health and enhance the quality of people’s lives. Product quality, safety and efficacy are critical components of the trust people place in Pfizer. We operate a comprehensive and robust quality management system, designed to ensure the production and supply of quality products.

We are committed to ensuring that our products are manufactured and supplied to high standards of quality. Our manufacturing operations are conducted in compliance with applicable regulatory requirements, Good Manufacturing Practices (GMP), and our own internal rigorous quality standards. We also require that our suppliers and partners adhere to high standards, and we conduct audits and oversight of our supply chain.

We are all responsible for ensuring that we perform our responsibilities in a manner consistent with Pfizer’s unwavering commitment to quality and compliance, and for reporting quality issues and concerns through the appropriate channels, including those described in this Blue Book.

See Corporate Policy 114 on policiesource.pfizer.com for more information on our commitment to quality.

We are committed to a quality culture, in which every colleague understands and takes ownership of the responsibility for protecting product quality and patient safety.

A Commitment to Customer Focus

We are deeply committed to meeting the needs of our customers, and we constantly focus on customer satisfaction.
A Commitment to Innovation

Innovation is the key to improving health and sustaining Pfizer’s growth and profitability.

The definition of a healthcare professional can vary by location and business unit and may include physicians, nurses, pharmacists and any others who administer, prescribe, purchase, recommend or are in a position to influence the use of our products.

The Marketplace and Interactions with Healthcare Professionals

We interact with healthcare professionals and other customers in many ways, including medical information communications, promotional activities, research and educational efforts.

We are committed to the highest standards of integrity and compliance with applicable laws and regulations in every aspect of our relationships with healthcare professionals.

We are committed to integrity in our marketing practices. All promotional materials and communications must be accurate, not misleading and compliant with all applicable medical, legal and regulatory standards, including applicable standards addressing substantiation, scientific rigor and fair balance. We will not engage in illegal or unfair activities, such as false or misleading advertising; bribery of competitors, customers or healthcare professionals; or unfair comments about competitors’ products.

We also must comply with Pfizer policies and procedures on labeling, promotional programs, product samples and other topics that affect our roles and responsibilities. Contact a member of the Legal or Compliance Division with questions about which standards apply.

Antitrust and Competition Laws

Antitrust and competition laws protect free enterprise. While these laws are complex and difficult to summarize, at a minimum they prohibit agreements between Pfizer and our competitors that affect prices, terms or conditions of sale or fair competition. It is your responsibility to be aware of these laws and their implications, including how they apply in the country in which you operate.

Pfizer prohibits:

- discussions or contacts with competitors about pricing, costs, or terms or conditions of sale;
- discussions or contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace;
- agreements with competitors regarding allocating markets or customers; and
- agreements with others to boycott customers or suppliers.

Many countries have antitrust or competition laws, though they vary significantly from country to country. For example, certain countries’ competition laws may be more stringent than those of the United States and regulate, among other things: distribution agreements; rebates and discounts to customers; patent, copyright and trademark licenses; territorial restrictions on resellers; and pricing policy generally. These laws are complex. You must ask for advice from the Legal Division before you act.

See Corporate Policy 603 on policiesource.pfizer.com for more information on compliance with antitrust laws.

My neighbor works for one of our competitors. Is it okay to discuss how her company deals with managed care companies?

No. Any subject that should not be discussed at a business meeting—because it would violate the law—should not be discussed in a social setting for the same reason.

Trade Association Meetings and Other Industry Gatherings

Trade association meetings and other industry gatherings can pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition laws. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported. If any kind of anti-competitive discussion arises, you should refuse to discuss the matter and leave the conversation immediately.
At a dinner party, a Pfizer colleague learns that her friend used a Pfizer product and experienced a headache. Does she need to report this?

Yes. Regardless of how she learns of the event, the severity or whether she thinks it was a side effect of the Pfizer product, it is her responsibility to report it within 24 hours from when the information was received.

**Ensuring and Monitoring the Safety, Quality and Performance of Our Products**

We are committed to providing products that are safe, effective and of the highest quality. Understanding a product’s safety profile, as well as its quality and performance characteristics, is essential. That’s why we all share responsibility for reporting safety, quality or performance issues concerning Pfizer products.

We may learn of adverse events or issues with a Pfizer product in many ways, such as telephone calls, websites, information received from Pfizer programs and studies, meetings or casual conversations. Colleagues are responsible for forwarding this information to the local Drug Safety Unit or appropriate Pfizer contact within 24 hours from when the information is received; reporting responsibilities and timeframes for vendors and contingent workers may vary depending on role.

Certain instances that may lead to increased risk of an adverse event also should be reported. These include, among other things, medication errors such as incorrect prescribing, as well as any situation in which a fetus or baby may have been exposed to a Pfizer product during pregnancy or breastfeeding.

Not only do we have an ethical and scientific responsibility to collect, process and evaluate this information, we also have a legal obligation to track and report relevant safety and quality information to regulatory authorities.

See Corporate Policy 903 on policymsource.pfizer.com for more information on how we ensure patient safety.

To make a report, call 1-800-438-1985.
Our Company

Our Commitment

Pfizer is committed to pursuing sound growth and earnings, while maintaining integrity in all that we do. We will abide by all applicable laws, regulations and other standards. We will operate in the best interests of the Company and our shareholders, be forthright about our operations and performance, and exercise care in the use of assets, information and resources. We will avoid conflicts of interest and use social media responsibly.

A Commitment to COLLABORATION

We know that to be a successful company, we must work together, frequently transcending organizational and geographic boundaries to meet the changing needs of our customers.
If something is trademarked, patented or copyrighted in one country, is it protected in other countries too?

Not necessarily. The Legal Division’s Intellectual Property Group tracks the status of the Company’s assets, and can help you determine whether something has protected status in any particular country.

When should I consider intellectual property protection for a new idea?

Involve the Intellectual Property Group as early as possible. Waiting until an invention, idea, trade name, logo or publication has been revealed to the public or disseminated without appropriate confidentiality mechanisms can preclude the possibility of obtaining suitable protection or expose Pfizer to legal action.

Patents, Trademarks and Copyrights

Protecting Pfizer’s intellectual property is essential to maintaining our competitive advantage. Pfizer’s intellectual property includes its patents, trademarks, trade secrets and copyrights, as well as scientific and technical knowledge, know-how and experience developed in the course of Pfizer’s activities. You are expected to support the establishment, protection, maintenance and defense of Pfizer’s intellectual property rights and to use those rights in a responsible way.

You also must respect the intellectual property of others. Unauthorized use, theft or misappropriation of third-party confidential information or intellectual property may result in significant fines, lawsuits, injunctions or criminal penalties for the Company and you. Contact the Legal or Compliance Division if you have any questions or concerns.

Books and Record Keeping

Accurate business records are essential to the management of the Company and to maintaining and safeguarding investor confidence. They also help Pfizer fulfill its obligation to provide full, accurate and timely financial and other disclosures to the public and governments around the world. All of Pfizer’s books, records and accounts must fully and accurately reflect the Company’s business transactions. These include financial statements as well as time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records, performance evaluations and other essential Company data.

Reporting Accounting Fraud

It is your responsibility to report any unrecorded funds or assets, or false or artificial entries in the books and records of the Company, if you become aware of them. If you learn of or suspect accounting fraud, report it immediately by contacting the Compliance Division or Corporate Audit.
Confidential and Proprietary Information

The products, services, ideas, concepts and other information we create and collect on a daily basis are important proprietary assets for Pfizer. These include marketing plans, sales data, clinical and medical data, customer and colleague records, manufacturing techniques, pricing data and information about business development opportunities.

It is important that we all protect and prevent inappropriate or unauthorized access to or disclosure of this information, as well as third party information provided to Pfizer.

Help protect Pfizer by following these principles:

- be careful when using electronic means of storing and sending information;
- don’t provide confidential or proprietary information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreements. If in doubt, check with your manager or the Legal Division;
- don’t discuss confidential information in places where you can be overheard;
- secure all confidential information when working in an open environment;
- dispose of confidential or proprietary information properly; and
- beware of informal telephone or email requests from outsiders seeking information (commonly known as “phishing”).

See Corporate Policy 401 on policysource.pfizer.com for more information on handling Pfizer’s information.

Privacy of Personal Information

Preserving the privacy of personal information is critically important. Personal information is information that can directly or indirectly identify an individual, such as name, contact information, and health-related and genetic information. Colleagues, healthcare providers and many others entrust Pfizer with personal information. Research, pharmacovigilance and other business activities also may give Pfizer access to personal information.

What if I have to share personal information with third parties to meet business needs?

You must ensure that third parties can protect personal information and will use it only to provide services to Pfizer, and that there is an appropriate contract in place that addresses protection of personal information. In some jurisdictions, other requirements may apply.

Privacy Laws

Protecting the privacy and security of personal information is a growing global concern. Many countries are enacting or strengthening privacy laws that govern the use of personal information and holding violators accountable. For more information, visit privacy.pfizer.com.
Pfizer, its business partners and its agents are accountable for protecting personal information and for processing it only within the boundaries of applicable law, and Pfizer policies and procedures.

Help protect the privacy of personal information, including personal health information, by following these principles:

- comply with applicable laws and regulations of the jurisdictions in which personal information is collected and used;
- collect and use the minimum amount of personal information necessary to achieve legitimate business purposes and keep it only as long as necessary to achieve those purposes;
- share personal information only with individuals who have a legitimate need for it and will protect it properly;
- follow Company guidelines for handling and destroying personal information; and
- report “Data Privacy Incidents”—if you learn of an inappropriate disclosure of personal information, immediately notify your manager, your site security officer or the Global Privacy Office.

See Corporate Policy 404 on policysource.pfizer.com for more information on protecting the privacy of personal information.
Records and Information Management

Pfizer has records and information management policies and procedures to ensure that Company records are maintained, stored and, when appropriate, destroyed in accordance with Pfizer’s needs and in compliance with applicable legal, regulatory, environmental, tax, employment and trade requirements.

Pfizer’s detailed Enterprise Records Retention Schedule (ERRS) provides specifics on appropriate retention durations. You must refer to this schedule and the specific requirements of your business and location, as well as all applicable corporate policies and procedures, when determining how long your records should be preserved.

Requests by third parties (such as governmental regulatory agencies), lawsuits or other inquiries can create the need to retain records beyond the normal retention period. It is our policy to preserve any records relevant to any litigation or government investigation involving Pfizer. If you receive a Legal or Tax Audit Hold Notice you must not alter or discard any relevant information. To understand which records must be preserved, refer to Pfizer’s Hold Notices list or contact the Legal Division.

Pfizer’s records management resources, including the ERRS and the Hold Notices list, can be found at erim.pfizer.com. For additional assistance, contact recordsmanagement@pfizer.com.

When should I dispose of my documents?

First, you must determine if a Legal or Tax Audit Hold applies. If so, all disposal activities must be suspended. Second, consult Pfizer’s Enterprise Records Retention Schedule (ERRS) to determine how long the document should be retained. If there are no applicable Legal or Tax Audit Hold Notices and the record has exceeded any retention time periods specified on the ERRS, you may dispose of it.

Company Records

Company records are any recorded information captured in any medium that reflects circumstances, events, activities, transactions or results created or maintained as part of conducting business for Pfizer or that serves as evidence of fulfillment of a business or legal obligation of Pfizer. These records may be physical or electronic. Examples of media containing business records include paper documents (including hand-written notes), audio or video recordings, and computer-based information such as email and computer files.

See Corporate Policy and Procedure 405 on policiesource.pfizer.com for more information on records and information management.
What do I need to do when working on a laptop computer in open plan Pfizer offices or public spaces?

While working in a secured Pfizer facility, activate the system lock when leaving the device to prevent unauthorized use. Don’t leave your laptop unattended in any location where security cannot reasonably be assured. In public settings, be careful to ensure that confidential or proprietary information cannot be viewed by others.

Acceptable Use of Information Systems

Pfizer supports information systems and networks to help colleagues work as effectively as possible. When used inappropriately, Pfizer’s data and systems may be exposed to substantial risk.

To ensure the security and integrity of Pfizer’s technology and information systems:

► use only authorized software, devices and procedures;
► don’t share your password except for a valid business reason (such as Pfizer technical support), after which it must be changed within 24 hours;
► share Pfizer business information only with authorized parties, and only by using Pfizer email or other approved technologies; and
► don’t use unauthorized devices, such as home computers, to transmit, store or work on Pfizer confidential or proprietary information.

Pfizer allows the incidental personal use of Pfizer information systems, subject to certain restrictions. Except where mandated by law, you are not guaranteed personal privacy for information sent to, sent from or stored in Company systems. Subject to local law, all documents, including electronic communications, are subject to review at any time to address business or legal requirements.

See Corporate Policy 403 on policiesource.pfizer.com for more information on acceptable use of Pfizer’s information systems.

Prohibited Activities

You may not use Pfizer information systems or devices for communications or other material that contain or promote anything that:

► violates harassment, discrimination or hostile workplace policies or laws;
► is defamatory, illegal, pornographic or obscene;
► is likely to interfere with work or result in the loss or damage of work or systems;
► solicits colleagues for any unauthorized purpose; or
► records communications without authorization.
Conflicts of Interest

A conflict of interest arises when you place your personal, social, financial or political interests before the interests of the Company. Even the appearance of a conflict can damage your reputation or that of the Company. However, many potential conflicts of interest can be resolved in a simple and mutually acceptable way.

While Pfizer respects your right to manage your investments and does not wish to interfere with your personal affairs, you are responsible for avoiding situations that present—or create the appearance of—a conflict between your interests and those of the Company.

Any potential conflict of interest must be disclosed to and approved by your manager. The Compliance or Legal Division must be consulted in certain situations. You must comply with Pfizer’s Corporate Policy 203 as well as any local and divisional conflict of interest policies that apply to your role, which may be more restrictive than the corporate policy.

The following are examples of potential conflicts of interest.

**Personal Investments or Transactions.** Conflicts of interest may arise if you or a family member: has a substantial financial interest in a Pfizer supplier, competitor or customer; has an interest in a transaction in which it is known that Pfizer is, or may be, interested; takes advantage of Pfizer’s corporate opportunities for personal profit; or receives compensation from a Pfizer supplier, competitor or customer.

I want to invest in a Pfizer supplier. Is this a conflict of interest?

Maybe, depending on factors such as your role, your influence on purchasing decisions, the amount of investment and Pfizer’s importance as a customer. Before investing, disclose this to your manager to help determine the best solution.

My spouse owns a vendor Pfizer might use. I do not have any decision-making responsibilities in this area. Do I need to disclose this?

Yes. Any potential conflict, or even the appearance of a conflict, might damage your reputation or Pfizer’s, and must be disclosed to your manager to help determine the best solution.

My brother, a contract employee for a supplier, does work for Pfizer. Is this a conflict of interest?

Maybe, depending on the roles you and your brother have. Because this is a potential conflict, you must disclose it to your manager. If appropriate, your manager will work with the Legal or Compliance Division to determine the best solution.
Some activities, such as serving on a board of directors or speaking at a conference, may present a potential conflict of interest. Refer to Corporate Policy 203 as well as any local and divisional conflict of interest policies that apply to your role for details.

**Gifts, Entertainment and Other Items of Value.** You and your immediate family may not give or accept gifts, services, perks, entertainment, discounts, loans or other items of more than modest value by local standards, to or from those who are doing business or seeking business with the Company. Items of modest value are permitted only if they are not given or received on a regular or frequent basis, and if they are not solicited by Pfizer colleagues. Refer to Corporate Policy 203 and any local and divisional conflict of interest policies that apply to your role for details, including monetary limits.

**Personal Relationships.** Pfizer discourages hiring close personal friends or relatives in the same business unit. A potential conflict arises if you hire, manage or otherwise do business with a close personal friend or relative or someone with whom you have an intimate relationship. The actions of family members and friends outside the workplace can also create a conflict if their actions cause you to lose your objectivity in the workplace.

**Outside Business and Other Interests.** A conflict of interest exists if your outside business or other interests can affect your objectivity, motivation or performance as a Pfizer colleague.

A second job or other affiliation with a Pfizer competitor is not allowed (other than in connection with your work for Pfizer, with appropriate approvals). A second job or other affiliation with a Pfizer customer, supplier or provider of goods or services is discouraged, but may be allowed with proper approval. When outside employment is allowed, colleagues are still bound by all confidentiality agreements with Pfizer and all Pfizer policies and procedures relating to confidential or inside information.

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**In my country, refusing a gift from a business associate could be an insult. What should I do when a gift over the value allowed is offered?**

Consult with your manager or the Legal or Compliance Division. If the gift must be accepted to preserve the relationship or is impractical to return, it may be possible to accept it as Company property or donate it to charity. For example, food items could be placed in a central location for everyone to share, or a painting could be donated to a local museum.

**Can I serve on a board of advisors for a small biotech company? Its areas of focus do not overlap with Pfizer’s.**

Board service and other roles with external organizations may present conflicts of interest, depending on the circumstances. Consult Corporate Policy 203 and any applicable local or divisional policies before you act, to determine what approval is needed.

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See Corporate Policy 203 on policiesource.pfizer.com for more information on conflicts of interest.
Social Media

“Social media” are digital technologies and practices that enable people to create and share content, opinions, insights, experiences and perspectives. The hallmarks of social media are user-generated content and interaction.

When engaging in social media activities including both internal-facing and external-facing platforms, adhere to Pfizer policies and these general principles:

- be transparent and make appropriate disclosures;
- do not make unauthorized disclosures;
- obtain necessary permissions before posting;
- be truthful, accurate and respectful;
- refer media inquiries to Global Media Relations;
- report adverse events found on the Internet or in social media to the appropriate contact; and
- ask first, post later.

Pfizer’s policies impose requirements on the creation and use of Pfizer-sponsored social media. You must consult the Legal Division when creating any Pfizer-sponsored social media.

All Pfizer-sponsored social media that discuss or relate to a Pfizer product require prior approval. Specific requirements apply to the content of such posts, the types of media in which they may appear and, in some cases, review by regulatory authorities.

Personal posts on external social media that include more than a neutral, passing reference to Pfizer products are prohibited. Any personal posts referencing Pfizer’s interests—which include Pfizer and its business, products, colleagues and former colleagues, policies, research, relationships and competitors—must include a disclaimer that mentions your relationship to Pfizer.

See Corporate Policy 407 on policiesource.pfizer.com for more information on social media.
Material Information

Material information is any information an investor might consider important in deciding whether to buy, sell or hold securities. Examples include: financial results, possible mergers, important developments (e.g., clinical trial results, regulatory decisions) and significant changes in business direction. Information that is not material to Pfizer may be material to another company with which Pfizer has or may be considering a relationship. Information is considered nonpublic until the first business day after it has been disclosed to the public. Examples of public disclosure include public filings with the U.S. Securities and Exchange Commission, press releases and conference calls with analysts to which the public has been invited in advance.

Inside Information

Many of us have heard of restrictions on “insider trading.” Simply put, it is illegal to buy or sell securities (for example, stocks, bonds or options) of a company when you are aware of “inside information”—material, nonpublic information—relating to the company. Securities laws and Pfizer policy prohibit you from using or disclosing any inside information that you may acquire during the course of your employment at Pfizer.

You may not use information gained through your employment with the Company, before this information is known publicly, to buy or sell the securities of Pfizer or any other company with which Pfizer has or may be considering a relationship (such as a customer, supplier, alliance partner or potential acquisition or collaboration candidate). Nor may you give inside information to anyone else so that they can trade. This restriction applies no matter where you live or where the receiver of the information lives. These restrictions apply to you, your spouse and minor children and anyone who lives in your household or is financially dependent on you.

Securities law violations are taken very seriously. Government agencies and stock exchanges are able to monitor trading activities through computerized records searches. Violations may result in significant civil and criminal penalties against companies and individuals.

See Corporate Policy 604 on policysource.pfizer.com for more information on the treatment of material, nonpublic information.
Competitive Intelligence

In today’s business environment, we have access to a great amount of information about other companies, their products and services, some of which is nonpublic.

You are free to gather intelligence about companies from public sources such as their websites, published articles, price bulletins, advertisements, brochures, public presentations and customer conversations. You may also contract with an outside vendor to gather competitive information, but only through the selection and contracting process administered by Pfizer’s Competitive Intelligence function.

Business information about other companies may only be collected and used ethically and in a way that does not violate any laws or confidentiality obligations. You must never use, or ask any third party to use, unlawful or unethical means such as misrepresentation, deception, theft, spying or bribery to gather information.

See Corporate Policy and Procedure 121 on policysource.pfizer.com for more information on competitive intelligence.

I want to know what patient recruitment exclusion criteria a competitor is using in a clinical trial. That information is not public. Can I pose as a potential patient recruit, call the research site and ask questions?

No. Misrepresentation—not disclosing that you are a Pfizer colleague or posing as something you are not—is an unethical way to gain access to a competitor’s confidential information. Before you engage in any competitive intelligence primary field research, consult with the Legal Division or Competitive Intelligence to confirm that your strategy is legal and ethical. The Competitive Intelligence function can help you identify appropriate research opportunities.
Global Trade Controls

We are all responsible for complying with trade control laws, which are complex and may change quickly as governments adjust to new political and security issues. Violations of global trade control laws can lead to significant fines and penalties, for both Pfizer and any individuals involved, as well as other business and supply chain issues.

Many countries have laws that govern the import, export or transfer of certain controlled products, software and technology, as well as the performance of certain controlled services. In addition, many trade control laws restrict Pfizer’s investments, transactions and business activities with certain countries, entities or individuals.

Some countries in which Pfizer does business have in place restrictive trade practices or boycotts against other countries or groups. Pfizer may not engage in agreements, provide any information or take any action that would support such restrictive trade practices or boycotts, unless they are allowed by U.S. laws.

Colleagues who work directly or indirectly with any of the above, as well as related financial transactions, or in areas such as international operations, logistics, finance, meeting planning, regulatory or legal, must be aware of Pfizer’s Global Trade Controls Policy and related procedures. In particular, all activities involving certain restricted individuals, entities or countries must be reviewed by the Legal Division. A list of restricted countries is available on gtc.pfizer.com. Any questions or concerns about global trade controls should be directed to the Legal Division.

See Corporate Policy 206 on policiesource.pfizer.com and visit gtc.pfizer.com for more information on global trade controls.

I am bringing together a team of international colleagues to collaborate on vaccine research. Do global trade controls affect this work?

Yes, you must consider global trade controls before a non-U.S. national is provided access to U.S.-origin technology, regardless of where in the world the access will occur. This is the case even when the colleague is in the United States under a visa or work permit, or on a short-term business trip. Consult gtc.pfizer.com or contact the Legal Division for more information.
Our Commitment

Pfizer is committed to treating our colleagues and job applicants with fairness and respect. Our policies prohibiting discrimination, harassment and retaliation are global policies intended to create a workplace that promotes a positive and productive environment. We believe in cooperation, teamwork and trust, which contribute to a positive work environment. Hostility and harassment are not tolerated.

A Commitment to
RESPECT FOR PEOPLE

We recognize that people are the cornerstone of Pfizer’s success. We value our diversity as a source of strength, and are proud of Pfizer’s history of treating employees with respect and dignity.
Anti-Retaliation Policy

Retaliation against any colleague who in good faith seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. If any individual, regardless of his or her role in Pfizer, retaliates against a colleague who has truthfully and in good faith reported a potential violation, Pfizer will take appropriate action—even if no violation is revealed upon investigation.

Equal Employment Opportunity

It is the Company’s policy to provide equal employment opportunities and to treat applicants and employees without regard to personal characteristics such as race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws.

At-Will Employment

Unless otherwise agreed upon in writing, each Pfizer colleague is employed by the Company on an at-will basis. At-will employment means that employment is not guaranteed for any specific amount of time, and the Company retains the right to terminate an individual’s employment at any time, with or without cause or notice. No oral representations made by any Pfizer colleague with respect to continued employment can alter this relationship. Consult with the Legal Division or Human Resources if you have questions.
Managers are responsible for ensuring compliance with this policy. Each operating unit should periodically monitor, report and, if necessary, improve its performance in the area of equal opportunity.

**Discrimination or Harassment**

Pfizer promotes and values a work environment free of verbal or physical harassment. This includes any unwelcome comments or actions regarding race, color, ethnicity, creed, ancestry, religion, gender, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by state or local law), the presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws.

My co-worker tells racially charged jokes that make me feel uncomfortable. What should I do?

Your co-worker should be made aware that these jokes are creating a negative work environment. You are encouraged to do this yourself if you are comfortable doing so. Whether you communicate directly with the co-worker or not, you should report this to your manager, who will be expected to take appropriate action. You may also contact the Employee Relations Group, Corporate Human Resources or the Compliance Division.

I know that sexual harassment is specifically prohibited by law in many countries, including the United States, but what about other locations?

We all should have a work environment in which we are shown respect by our colleagues. Pfizer’s policies on discrimination and harassment apply globally. In addition, you must follow applicable local laws in your area. Consult your local Human Resources representative if you are uncertain about whether certain conduct is consistent with an environment of dignity and respect.
I think I might have a substance abuse problem. Can Pfizer help me?

Pfizer encourages you to seek help by contacting counseling professionals available through Pfizer colleague assistance and support programs. If you request voluntary assistance for a substance abuse problem, you may be eligible for an approved leave (depending on your location) to pursue treatment and rehabilitation or other forms of assistance. For more information, see Pfizer’s Substance Abuse Prevention Policy.

This policy applies to conduct that: is made a condition of employment; is used as a basis for employment decisions; creates an intimidating, hostile or offensive working environment; or unreasonably interferes with an individual’s ability to work.

Colleagues who engage in acts of harassment or discrimination are subject to corrective action that may include termination of employment (subject to applicable law). Managers are responsible for maintaining business units that are free of harassment and discrimination. Pfizer is also committed to providing an environment that is free of retaliation.

If you experience or are aware of any discrimination or harassment, you can report it using any of the many channels available for raising concerns, including those described in this Blue Book.

Substance Abuse

Substance abuse can pose serious health and safety hazards in the workplace. We are committed to achieving an environment free of substance abuse for the health and well-being of colleagues and for the benefit of the Company.

Pfizer’s formal policy and guidelines are compassionate but firm. The use of illegal drugs and the misuse of alcohol and other substances, including over-the-counter or prescription drugs, is prohibited in the workplace. The workplace includes anywhere that a colleague is conducting Pfizer business, regardless of time or location.

Subject to local laws and practices, Pfizer may conduct pre-employment drug testing and colleagues may be tested if they display unusual or erratic behavior such that there is a reasonable suspicion of substance abuse. In addition, where permitted by law, colleagues may be subject to additional testing, including unannounced testing on a random basis.

Visit hrsource.pfizer.com or policysource.pfizer.com for Corporate Human Resources policies.
Our Commitment

Pfizer is committed to participating actively in and improving the communities in which we do business. As a member of today’s rapidly changing global community, we strive to adapt to the evolving needs of society and contribute to the overall health and wellness of our world. We work to protect the environment, and the health and safety of those who work for and with us. We cooperate with local governments, respond appropriately to inquiries from the public and conduct political activity responsibly.

A Commitment to COMMUNITY

We play an active role in making every community in which we operate a better place to live and work, knowing that its ongoing vitality has a direct impact on the long-term health of our business.
Doing Well by Doing Good: Corporate Responsibility

At Pfizer, we recognize that helping society benefits us all. It strengthens our company and helps fulfill our business purpose—to bring therapies to people that significantly improve their lives. We seek to improve the well-being of people around the world through our responsible business actions and through sustainable social investments designed to improve access to medicines and healthcare.

By partnering with select organizations, governments and foundations that have complementary knowledge, experience and skills, we work to find answers that will have a sustained and meaningful impact on global health. Our social investments include:

- **Global Health Fellows and Teams**, which place colleagues in short-term fellowships with international development organizations to bring about meaningful and systematic improvements in health service delivery;

- **International Trachoma Initiative (ITI)**, a public-private partnership dedicated to eliminating the world’s leading cause of preventable blindness; and

- **Infectious Diseases Institute**, intended to build the capacity of health systems in Africa to deliver sustainable, high-quality care and prevention of HIV/AIDS, tuberculosis, malaria and related infectious diseases through training, research and advanced clinical services.

See Pfizer’s Annual Report or visit [www.pfizer.com/responsibility](http://www.pfizer.com/responsibility) for more information on corporate responsibility.
Protecting the Environment, and Health and Safety

Protecting the environment, and the health and safety of our colleagues, contingent workers, visitors and the communities in which we operate is a business priority and is core to Pfizer’s Values. We are committed to:

- ensuring compliance with all applicable environmental, health and safety (EHS) laws and internal standards;
- continuous improvement of our EHS performance;
- understanding the EHS properties of our products throughout their life cycle;
- selecting suppliers and business partners with consideration of their ability to run safe and environmentally responsible operations;
- educating, training and motivating colleagues to work in a safe, environmentally responsible manner;
- fostering openness and dialog on EHS matters with internal and external stakeholders, and communicating risk, performance and progress.

Colleagues and contingent workers are responsible for:

- understanding and complying with applicable EHS requirements;
- reporting to their managers or local EHS function injuries and illnesses at work, and any other issues that could impact the environment, health or safety;
- reporting concerns about potential non-compliance to their managers, to the local EHS function or through other reporting methods described in this Blue Book.

See Corporate Policy 113 on policiesource.pfizer.com for more information on our commitment to the environment, health and safety; visit ehs.pfizer.com for Pfizer’s EHS Standards.

A Commitment to Leadership

We believe that leaders empower those around them by sharing knowledge and rewarding outstanding individual effort. We are dedicated to providing opportunities for leadership at all levels in our organization.
Government Investigations: Requests for Information or Facility Visits

Pfizer and our affiliates will cooperate with all government authorities in connection with requests for information or facility visits. If you are contacted by any government authority (U.S. or otherwise) with regard to a non-routine request for information or a facility visit, you must immediately notify a member of the Legal Division. The Government Litigation Group (within the Legal Division) also needs to be notified. Consult Corporate Procedure 602 and any local policies or procedures for details. The Legal Division will determine what information needs to be provided in each case. Although the Company and our colleagues may not appear to be the subject or target of an inquiry, non-routine requests may expose Pfizer or individual colleagues to civil or criminal liability.

In addition, physical searches and raids by government authorities, as well as non-routine regulatory inspections that result in “critical” adverse findings or formal warnings, are considered Referable Compliance Issues (RCIs). The Compliance Division must be notified immediately of all RCIs.

See Corporate Procedure 602 on policiesource.pfizer.com for more information on responding to requests for information or facility visits.
Media, Analyst, Investor and Public Inquiries

Pfizer is committed to delivering accurate and reliable information to the media, financial analysts, investors and other members of the public. All public disclosures, including forecasts, press releases, speeches and other communications, will be honest, accurate, timely and representative of the facts.

Colleagues other than those in Global Media Relations and Investor Relations are not authorized to answer questions from the media, financial analysts, investors or other members of the public. Contact the Global Media Relations Press Office at 1-212-733-1226 for media and public inquiries or Investor Relations at 1-212-733-2668 for analyst and investor inquiries. This includes formal and informal requests for information, whether made in person, over the phone, in writing or using any form of social media. You can also refer people to www.pfizer.com.

See Corporate Policy 604 on policysource.pfizer.com for more information on the treatment of material, nonpublic information.

Political Activity

While Pfizer encourages colleagues to participate in electoral politics in those countries where appropriate, such activity must occur strictly in an individual and private capacity and not on behalf of the Company. Colleagues may not conduct personal political activity on Company time or use Company property or equipment for this purpose.

See Corporate Procedures 802a and 802b on policysource.pfizer.com for information on political contributions.

A reporter called me looking for some basic information about the Company. Can I answer her questions?

No. Even simple questions must be rerouted to Global Media Relations because you may not have all the relevant facts. Even if you provide accurate information, releasing it at the wrong time could interfere with the Company’s plans. In addition, uncoordinated disclosure could pose problems under securities laws if the information released was material inside information.
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The Pfizer Values

- Collaboration
- Leadership
- Community
- Performance
- Customer Focus
- Quality
- Innovation
- Respect for People
- Integrity
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