



**Performance**  
with **Integrity**  
It's Who We Are

# Your Guide to the Compliance Process

Our Commitment and Your Responsibilities

Disciplinary Action Guidelines

Guidance for Managers

Investigations Process Overview

US Reporting Process Overview







**This document outlines the responsibilities of the Corporate Compliance Group and colleagues during an internal investigation.**

The Corporate Compliance Group is responsible for ensuring that the Company investigates and appropriately resolves Referable Compliance Issues. Compliance may seek help in investigating these matters from you and other colleagues and groups. We are committed to ensuring that these investigations are independent, objective, thorough and adhere to Pfizer's values, including Integrity and Respect For People.

	Description	Our Commitment	Your Responsibilities
1 Initial Contact/ Interview Scheduling	If you are contacted by Compliance it does not necessarily mean that you are the subject of an investigation. The vast majority of employees are doing the right thing, but they may have information the Company needs to appropriately address a concern.	<ul style="list-style-type: none"> <li>To be considerate of your time while ensuring a timely review</li> <li>To conduct interviews by phone or in your geography when appropriate</li> <li>To answer your process-related questions without divulging substantive details</li> </ul>	<ul style="list-style-type: none"> <li>To make yourself available for a meeting on an expedited basis (by phone or in-person) at the discretion of Compliance</li> <li>To keep your contact with Corporate Compliance confidential</li> </ul>
2 Interview	Compliance interviews colleagues to better understand facts related to potential compliance issues. Interviews often involve asking follow-up questions, repeating certain questions and clarifying any inconsistent information. This is done to ensure that facts are understood and may be objectively and thoroughly reported to the Company.	<ul style="list-style-type: none"> <li>To inform you that no decisions have been reached</li> <li>To inform you of:               <ul style="list-style-type: none"> <li>The Company's commitment to non-retaliation</li> <li>Your obligation to maintain the confidentiality of the matter</li> <li>Your obligation to provide truthful responses</li> </ul> </li> <li>To inform you that Compliance is the Company's legal representative, not your personal attorney</li> </ul>	<ul style="list-style-type: none"> <li>To provide truthful and complete answers</li> <li>To maintain the confidentiality of the matter</li> <li>To provide any requested documents</li> <li>To ask questions you have about the process</li> <li>To inform Compliance of any other potential compliance issues</li> </ul>
3 Follow-Up Activities	Compliance conducts follow-up activities as needed, including additional interviews and document collection.	To contact you if clarification or additional information is required of you	<ul style="list-style-type: none"> <li>To contact Compliance:               <ul style="list-style-type: none"> <li>If you recall additional information that may be relevant to the investigation</li> <li>To clarify previous statements/information</li> </ul> </li> <li>To inform Compliance of any potential breach of confidentiality</li> </ul>
4 Resolution	Corrective action, including training, policy changes or discipline may be taken depending on the findings.	<ul style="list-style-type: none"> <li>To report our findings on a "need to know" basis to the business leaders who decide what, if any, corrective action needs to take place</li> <li>To inform the appropriate business leaders when the matter is concluded</li> </ul>	<ul style="list-style-type: none"> <li>To support the corrective action the Company takes</li> <li>To maintain the confidentiality of the investigation</li> <li>To ask about the outcome if you have questions</li> </ul>



## Your Duty to Act

Pfizer views all employees as critical to maintaining an effective compliance system. In addition to your personal responsibility for following the standards described in the Blue Book, you are responsible for raising concerns about risks to the Company — ideally, before these risks become actual problems. If you reasonably believe that another employee has violated, or may violate, a local, state, or federal U.S. law, law of a foreign country, or specific Pfizer policy or procedure, you must report that information immediately to your supervisor or to the Chief Compliance Officer through the Corporate Compliance Group. Whenever you are in doubt, it is best to raise your concern. By raising concerns you allow management the opportunity to address potential problems.

## The Open Door Policy/No Retaliation Policy

The foundation of our compliance effort is openness, accessibility, and discussion within the Pfizer community. Most issues can be resolved locally before they become problems for the Company, employees, or the public. The Open Door Policy encourages employees to present ideas, raise concerns, and ask questions — especially those of a legal or ethical nature, but also those relating to quality of work. All managers are responsible for supporting this policy by maintaining an “open door” for their direct reports and other employees who may reach out to them. While we hope that employees feel comfortable discussing any matter with their supervisors, there may be times when a supervisor cannot help. In these cases, you should speak with others, including:

- the next higher level of supervision;
- your operating unit head;
- your local Human Resources representative; or
- the Corporate Human Resources Group.

You may also reach out to other groups like the Corporate Compliance Group, Global Diversity and Inclusion, or any staff-level managers or other appropriate person. **Pfizer policy prohibits retaliation against individuals who raise concerns through any of the Company's many channels.**

## The Compliance Hotline

While compliance matters can often be resolved at the local level, the Compliance Hotline provides another way to address matters that might not be adequately resolved there and, in general, provides a way to report a concern or get information or advice anonymously. The Compliance Hotline is available 24 hours a day, 7 days a week, 365 days a year. To reach the Hotline call:

**1-866-866-PFIZ (1-866-866-7349).**

The Compliance Hotline is operated by specially trained third-party representatives. Calls to the Compliance Hotline will not be traced or recorded, and callers can choose to remain anonymous if they wish. Compliance Hotline representatives will listen to your concerns, ask questions, and review the information provided. They will then forward your matter to Pfizer's Corporate Compliance Group, which will take appropriate action. The caller can arrange to receive information about the Company's response to the call.

# Corporate Compliance

## Disciplinary Action Guidelines

These guidelines articulate generally applicable principles for assessing disciplinary action. The application of these principles may result in varying outcomes depending on the facts and circumstances of each case.

### Disciplinary Guidelines

Type	Examples	Disciplinary Action Options
<b>Category 1 Violation</b>	<ul style="list-style-type: none"> <li>Off-label detailing (including pre-approval promotion)</li> <li>Improper payment to an HCP/HCO</li> <li>Misappropriation of Company assets</li> <li>Falsification of Company records</li> <li>Patient privacy violations</li> <li>Obstructing an investigation</li> <li>Major business conduct violation (e.g., insider trading, violation of Company confidentiality, accounting fraud)</li> </ul>	<ul style="list-style-type: none"> <li>Termination</li> <li>Final Warning</li> <li>Loss of Financial Incentives (e.g., AIP reduced prospectively or retrospectively)</li> </ul> <p><i>Category 1 violations may result in additional disciplinary action identified below in Category 2</i></p>
<b>Category 2 Violation</b>	<ul style="list-style-type: none"> <li>Minor violation of promotional policy (e.g., creation of on-label homemade, non-material modification of approved materials)</li> <li>Non-material SOP deviations/ infractions (not involving policy violation)</li> </ul>	<ul style="list-style-type: none"> <li>Written Warning</li> <li>Verbal Warning</li> <li>Coaching</li> <li>Training</li> </ul> <p><i>Repeated Category 2 Violations may result in Category 1 disciplinary action</i></p>

### Variables Potentially Impacting Disciplinary Action

	◀ Less Severe	More Severe ▶
<b>Manager Factor*</b>	Demonstrated responsibility/accountability	Directed or approved, neglected violation
<b>Frequency of Conduct</b>	Isolated	Pervasive
<b>Disclosure</b>	Self-report	Obstruction
<b>Compliance History</b>	First violation	Pattern of violations

\*Applies to determine disciplinary action for managers (within 2 levels of organizational hierarchy) of colleagues involved in violative conduct

## Guiding Principles

The purpose of Pfizer's disciplinary approach, including disciplinary actions related to issues investigated by Corporate Compliance, is to address instances of policy or legal violation and to protect Pfizer's many stakeholder groups, including patients, healthcare professionals, colleagues and shareholders. In administering disciplinary action, Pfizer is guided by several principles, including:

- Fairness
- Consistency
- Accountability
- Respect

## Range of Disciplinary Actions Taken

Depending on violation type, Pfizer utilizes a broad range of disciplinary approaches, from verbal coaching for minor process infractions, to termination for major violations such as off-label promotion or misappropriation of Company funds.

*Page three of this document provides a more detailed overview of disciplinary actions taken for different types of violations as well as the variables that are considered when reviewing specific instances.*

## Enduring Accountability

Colleagues will be held accountable for their current policy or legal violations as well as those that occurred in past roles. Past violations will be judged based on the prevailing policies and standards at the time of violation and may result in retroactive loss of financial incentives that were gained due to the violative acts, in addition to other appropriate disciplinary action.

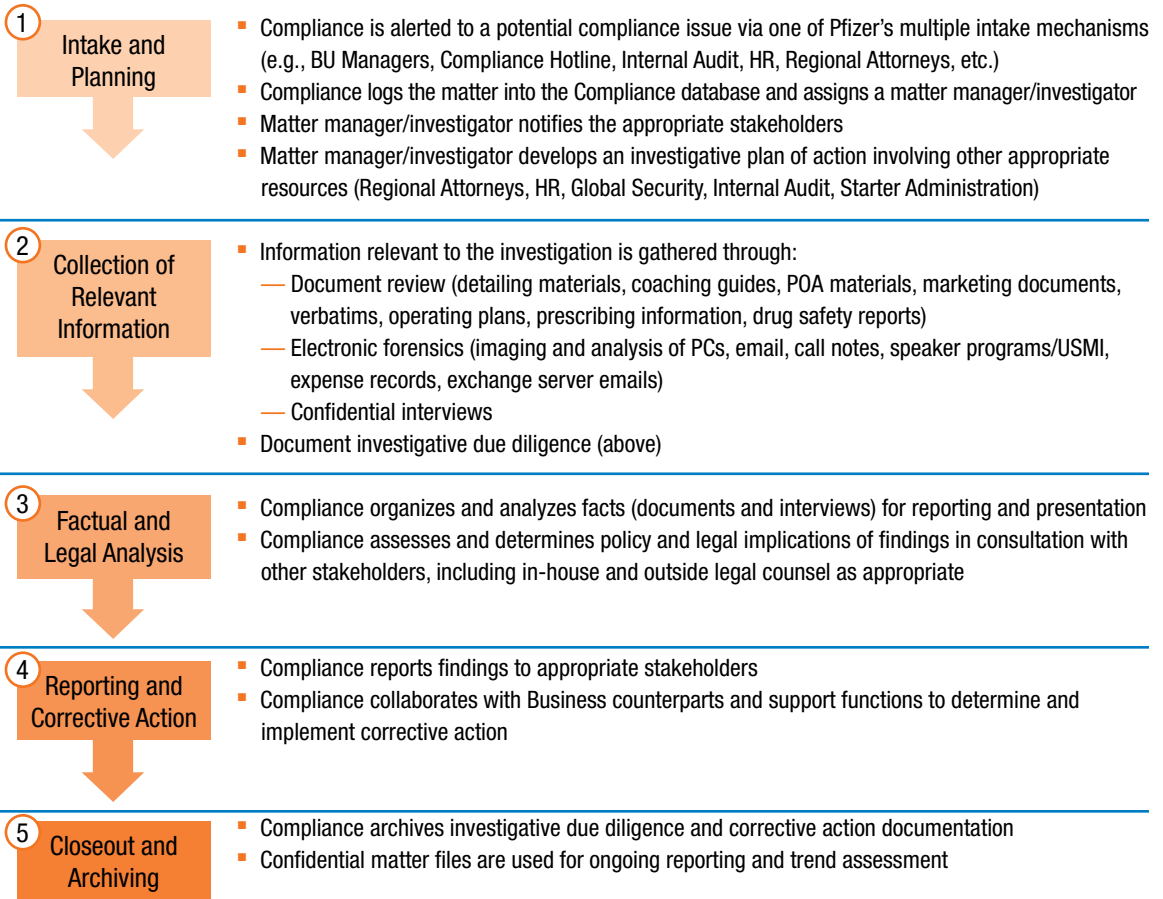
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The following guidance summarizes your key responsibilities in the context of a Compliance investigation, and will help you answer questions you may receive from your direct reports or other colleagues about a pending Compliance matter.

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- **Managers are responsible for supporting the Company’s process for making sure that Referable Compliance Issues (“RCIs”) are appropriately addressed and resolved.** This process may require Compliance to contact colleagues under your management in order to conduct a confidential and independent investigation. These meetings are strictly for fact finding. The Company has not drawn any conclusions about the matter and is working, through Compliance, to facilitate a prompt resolution once the facts have been determined.
- **Let Compliance know if you have questions or want to discuss the matter.** Compliance will be sure to answer your questions, and provide you with guidance to help you meet your obligations in the context of an investigation.
- **Make sure that you do not discuss or question colleagues about the matter.** This could be perceived as retaliation, or as an attempt to self-investigate, even though that may not be your intention. Additionally, you may not coach colleagues or otherwise try to influence what they say during their meeting with Compliance.
- **If a colleague informs you that they have been contacted by Compliance tell them that:** the meetings Compliance schedules with colleagues are confidential and strictly for fact finding; they are expected to cooperate fully, to be forthright, truthful and to keep it confidential; and they will not be retaliated against. You should also let the colleague know that these obligations apply to all colleagues regardless of their position.
- **If a colleague otherwise approaches you to talk about the matter tell them that:** colleagues are expected to keep the matter confidential, and to direct any questions, concerns or additional information they may have to Compliance. Please let Compliance know if a colleague has approached you to discuss a matter so that Compliance may respond to the colleague.
- **Let Compliance know if you think your manager or anyone else needs to know about the matter.** Compliance will work with you to make sure that appropriate notifications take place on a need to know basis.

The specific actions taken to investigate a Referable Compliance Issue (RCI) may vary based on the nature of the allegations, the specific facts uncovered in the investigation and the potential risks to Pfizer.



The need for confidential and comprehensive investigations is driven by key stakeholders, including the Corporate Compliance Committee, the Board of Directors Audit Committee, the Department of Health and Human Services, the Office of the Inspector General (pursuant to our CIA) and law enforcement agencies including the DOJ and State Attorneys General as well as the necessity to protect Pfizer's attorney-client privilege.

### Referable Compliance Issue

**Referable Compliance Issues (RCIs)** are **significant** potential violations of applicable law or company policy that must be reported to the Corporate Compliance Group for investigation. Whether a matter is **significant** depends on particular facts of the situation. Some considerations are whether the action was intentional or part of a pattern. Was the action criminal? Was a manager involved? Did the action expose employees or the public to dangerous health or safety risks? What are the potential consequences for the company?

#### **Sample Priority RCIs May Include:**

- Significant improper or off-label detailing
- Improper payment to healthcare professionals or organizations
- Best price violation (e.g., improper discussions of “value added” programs in connection with decisions to add Pfizer products to formularies)
- Books and records abuses
- Research/clinical study abuses (especially concerning data submitted to the FDA)
- Matters involving one or more high level managers as the subject
- Manufacturing abuses
- Allegations relating to pending government investigation
- Items that may have significant media implications

**The identification of any matter as a Priority RCIs is subject to continuing review and evaluation based on the best available information**

**When in doubt, you should contact Corporate Compliance**

## Key Contact Information

### Corporate Compliance Information

Pfizer Compliance Hotline: 1-866-866-7349

Pfizer Compliance Email Address: [corporate.compliance@pfizer.com](mailto:corporate.compliance@pfizer.com)

Pfizer Compliance Website: <http://integrity.pfizer.com>

Corporate Compliance Group: 1-212-733-3026



