

A large, stylized graphic of a DNA double helix. The left half is solid blue, and the right half is a light gray wireframe. The helix is positioned diagonally across the page.

BREAKTHROUGHS that change patients' lives

BLUE BOOK: Pfizer's Code of Conduct

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Pfizer's Code of Conduct (the *Blue Book*) is a general reference for all colleagues everywhere we do business. The *Blue Book* is not a legal document and is intended for informational use only. It does not describe all applicable laws or Company policies or give full details on any individual law or policy. Pfizer reserves the right to modify, revise or alter any policy, procedure or condition related to employment at its sole discretion and at any time without notice and without revision of the *Blue Book*. The contents of the *Blue Book* do not constitute the terms of a contract of employment, and nothing contained herein should be construed as a guarantee of continued employment or employment for any particular period of time—employment at Pfizer is on an at-will basis (subject to applicable laws). The information herein can be changed or revoked unilaterally by the Company at any time and is not all-inclusive. This online version of the *Blue Book*, accessible through the Compliance website (integrity.pfizer.com), supersedes all prior versions of the *Blue Book*.



At Pfizer, patients are at the center of everything we do. In fact, they are at the heart of our purpose: *Breakthroughs that change patients' lives.*

Our ability to deliver breakthroughs depends upon each of us living by our four core values—**Courage, Excellence, Equity, and Joy**. Together these values define our culture and guide our day-to-day interactions with customers, business partners, and colleagues.

Pfizer's *Blue Book*—our Code of Conduct—is designed to support these values, particularly Excellence, as **we perform at our best together**, and Equity, as we always **act with integrity**. The *Blue Book* describes how we operate and guides the decisions we make in support of our purpose, including how **we speak up** when we see something that concerns us—a behavior essential to our value of Courage. Seeking advice, raising concerns, and reporting misconduct are critical to our ability to serve patients.


Each of us is responsible for understanding the *Blue Book* and adhering to our Code of Conduct every day. In doing so, we demonstrate our continued commitment to living our values and earning the trust of the patients we serve.

Albert

We Live Our Values & Are All Responsible

ACT WITH INTEGRITY





We Live Our Values & Are All Responsible

We deliver
breakthroughs
the right way.

At Pfizer, we do the right thing because patients' lives depend on us. We act with integrity in everything we do, and our Values guide us in making the right decisions ethically, thoughtfully, and responsibly so that our business can appropriately meet patient and societal needs. Ethical decisions promote trust and accountability for doing the right thing, both internally and externally.

To fully realize Pfizer's purpose—breakthroughs that change patients' lives—we have established clear expectations regarding what we need to achieve for patients and how we will achieve those goals. The “how” is represented by our four powerful Values—Courage, Excellence, Equity, and Joy—that define our Company and our culture.

Each of us is responsible for living our Code of Conduct and holding each other accountable for the same. The *Blue Book* applies to everyone, including all colleagues and officers of Pfizer and its subsidiaries. In certain circumstances, this Code also applies to contingent workers. Managers set the tone and model ethical behavior, cultivate an inclusive Open Door culture, and communicate the expectation that each of us must live our Values of Courage, Excellence, Equity, and Joy every day.

Remember, not following our Code may harm our Company, colleagues, patients, customers, communities, business partners, and investors. Violation of the Code or policies may result in disciplinary action up to and including termination of employment.

The Code does not answer how to act in every situation, but it does outline the Values and principles you need to guide you in your daily work. It also provides information on how to seek further guidance, ask questions, and raise concerns.



Courage. Breakthroughs start by challenging convention, especially in the face of uncertainty or adversity. This happens when we think big, speak up, and are decisive.



Excellence. We can only change patients' lives when we perform at our best together. This happens when we focus on what matters, agree who does what, and measure outcomes.



Equity. We believe that every person deserves to be seen, heard, and cared for. This happens when we are inclusive, act with integrity, and reduce healthcare disparities.

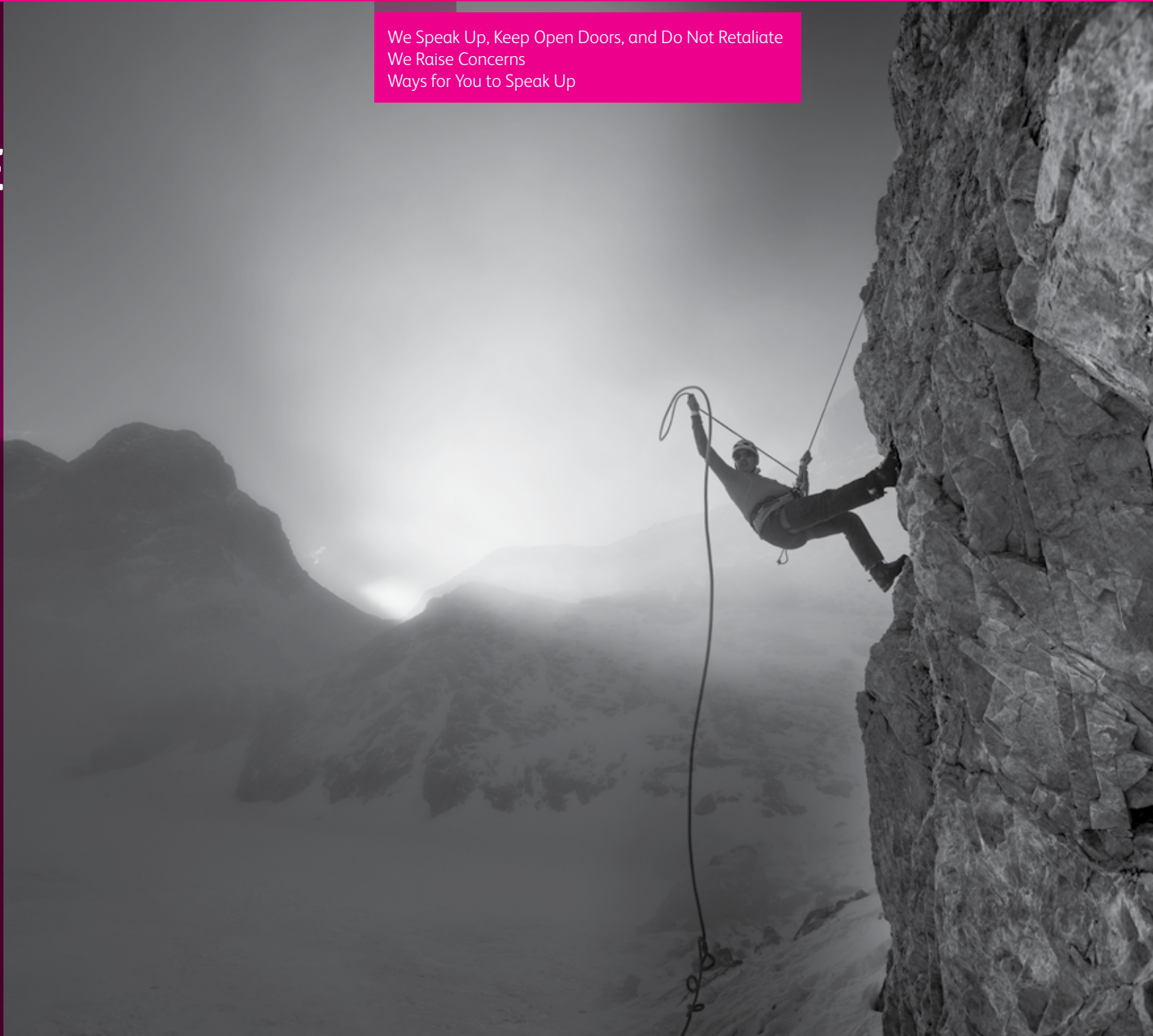


Joy. We give ourselves to our work, and it also gives to us. We find Joy when we take pride, recognize one another, and have fun.

Our Values guide us in our daily work. That is why they are incorporated into every section of this *Blue Book*.

COURAGE

We Speak Up, Keep Open Doors, and Do Not Retaliate
We Raise Concerns
Ways for You to Speak Up



We Speak Up, Keep Open Doors, and Do Not Retaliate

Speaking up requires Courage. As Pfizer colleagues, we share the privilege and responsibility of ensuring we honor our Values and follow policies, including by speaking up when we have questions or concerns. Speaking up helps us learn about issues and manage risks before they become problems. The environment we need for breakthroughs depends on empowering each of us to speak our mind.

Speak up if you have an idea. Speak up if you have a question. Speak up if you have a concern. Our Open Door Policy provides many avenues for you to speak up without fear of retaliation, harassment, discrimination, or other inappropriate behavior.

We do not tolerate retaliation against those who raise concerns at Pfizer.

If you seek advice, raise a concern, report misconduct, or provide information in an investigation, you cannot be retaliated against for having done so. If you believe that you or another colleague has been retaliated against for any reason, report the conduct using any method described in this *Blue Book*.

We have the
Courage to speak
up if something
doesn't seem
right.

Our Commitment to COURAGE

- We encourage reporting by not tolerating retaliation in any form.
- We report all suspected retaliation.



Retaliation is adverse action that can take various forms, including unfavorable work assignments, unfavorable performance reviews, threats, harassment, demotion, suspension, reduced compensation, denial of benefits, or termination, among others.



[Learn More](#)

- [Corporate Policy 702 \(Open Door Policy\)](#)
- [Corporate Policy 201 \(Integrity, Compliance Reporting Obligations, No Retaliation Policy\)](#)



We Raise Concerns

We value, respect, and review all reports. If you suspect potential misconduct, report it. Potential misconduct includes failing to follow laws, regulations or policies, or failing to live our Values. You can raise concerns to your manager, another manager, Human Resources, the Legal Division, the Employee Relations Group, or the Compliance Division. You can also make anonymous reports to the Compliance Helpline (subject to local restrictions).

Your concerns will be analyzed and addressed by the appropriate Pfizer group according to our policies and procedures. For example, significant potential, suspected, or actual violations of law or policy—referable compliance issues (RCIs)—are investigated exclusively by the Compliance Division.

Our Commitment to COURAGE

- We raise concerns when safety, quality, or integrity are in question.
- Confidentiality is maintained to the fullest extent possible.



Personal Disclosure Requirements

If you have been excluded, debarred, or suspended, or 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 and may become excluded, debarred, or suspended.



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 and take appropriate action to investigate.



Learn More

- [Corporate Policy 201 \(Integrity, Compliance Reporting Obligations, No Retaliation Policy\)](#)



*We live
our Values.*

Ways for You to Speak Up

Department	Contact
Management Discuss questions, ideas, and concerns without fear of reprisal. Many people are available to help; consult the person with whom you feel most comfortable.	<ul style="list-style-type: none"> • Your manager or someone else in your division • Any other manager • Company leadership
Human Resources Contact Human Resources (HR) for any concerns you may have.	<ul style="list-style-type: none"> • Your local HR representative • Corporate HR
Employee Relations Contact Employee Relations directly to ask questions or raise concerns. Employee Relations are neutral and objective investigators who uphold Company Values and policies in support of the Open Door Policy.	<ul style="list-style-type: none"> • Employee Relations (where available)
Compliance Division Contact the Compliance Division directly to ask questions, present ideas, or raise concerns. The Compliance Division website includes additional policies, procedures, and resources.	<ul style="list-style-type: none"> • Your Compliance Division contact • corporate.compliance@pfizer.com • Compliance Division Website: http://integrity.pfizer.com • +1-212-733-3026 • +1-917-464-7736 (secure fax) • 235 East 42nd Street, New York, NY 10017
Helpline The Compliance Helpline provides a way to report concerns or get advice, 24 hours a day, 7 days a week, 365 days per year. Anonymous reporting is available in many locations, subject to local laws.	<ul style="list-style-type: none"> • Visit pfizer.ethicspoint.com to make a report • Visit helpline.pfizer.com for local phone numbers • Visit raisingcomplianceconcerns.pfizer.com for information for your location • In the U.S.: 1-866-866-PFIZ (7349)
Office of the Ombuds Pfizer's Office of the Ombuds provides a safe, informal place where colleagues can confidentially get information and guidance to help address and resolve work-related issues. Conversations with the Office of the Ombuds are "off-the-record" and not disclosed to anyone unless they involve a risk of physical harm.	<ul style="list-style-type: none"> • U.S.: +1-855-PFE-OMBD (1-855-733-6623) or Ombuds@pfizer.com • Ex-U.S.: Ombuds@pfizer.com • Visit Ombuds.pfizer.com for more information and local phone numbers

EXCELLENCE

For Our Patients
With Our Products and Product Development
In How We Conduct Our Business
In Following the Letter and Spirit of Laws



For Our Patients

Interactions With Patients and Patient Organizations

Addressing the unique needs and challenges of patients is paramount to what we do, because patients are at the heart of our purpose: Breakthroughs that change patients' lives. The ability to interact with patients and Patient Organizations is a privilege that helps us develop breakthroughs tailored to patients' needs and provides us with insights into disease burden. When we interact with patients and Patient Organizations, we do so respectfully and consistent with applicable laws, regulations, industry standards and codes, ethical considerations, and our Values.

Given complex and evolving legal, regulatory, and industry requirements on interactions with patients and Patient Organizations, including interactions relating to certain patient assistance programs, contact Legal and Compliance within your market for more guidance.



All individuals deserve access to quality healthcare and medicines prescribed by their physicians. Charitable contributions to Independent Charity Patient Assistance Programs ("ICPAPs") can provide a means to help patients access their medicines by providing assistance for co-pay, deductible and/or premium obligations for prescriptions. However, any such donations are subject to strict legal requirements. To ensure compliance with laws, Pfizer policy places strict limits on colleagues' interactions with, donations and allocations to, and data from or about ICPAPs. Additionally, Pfizer's Global Health & Patient Access group has the sole responsibility for budgeting and allocating ICPAP donations.



• **Are you interacting with a Patient Organization?** Know who you are engaging with.

- **What is the nature of the interaction?** Think through your decision-making.
- **What is the impact of your interaction?** Think about the impact to yourself, your colleagues, the Company, and the patient or Patient Organization.
- Our interactions with Patient Organizations must be based on mutual respect and adherence to high ethical standards, and reflect an understanding that Patient Organizations are independent entities whose work is guided by their own interests and mission.



Learn More

- [Global Guidelines on Interactions with Patients and Patient Organizations](#)
- [Corporate Policy 803 \(Contributions to Independent Charity Patient Assistance Programs\)](#)



Patient Organizations are generally independent not-for-profit entities that represent the needs of people living with medical conditions, their families, or other caregivers.

For Our Patients

Interactions With Healthcare Professionals and Customers

We interact with healthcare professionals and other customers in many ways, including through research and development, market access, educational, and promotional activities. We are committed to the highest standards of excellence and we act with integrity and transparency in every aspect of our relationships with healthcare professionals.

Our Commitment to EXCELLENCE

- We consider how our interactions with customers may appear and do not engage in illegal or unfair activities, such as false or misleading advertising, bribery or corruption, or making unfair comments about competitors' products.
- We are committed to acting with integrity in all marketing practices, including labeling, promotional programs, product samples, and communications with stakeholders.
- We provide timely and honest product information to patients, consumers, healthcare professionals, and regulators worldwide, providing appropriate uses for our products and the efficacy and safety data relating to those uses.
- We recognize our interactions with healthcare professionals can cause apparent or actual conflicts of interest; therefore, we support the disclosure of financial and other interests and relationships with healthcare professionals in research, education, or clinical practice.



[Learn More](#)

- [Corporate Policy 201 \(Integrity, Compliance Reporting Obligations, No Retaliation Policy\)](#)
- [My Anti-Corruption Policies and Procedures \(MAPP\)](#)
- [Corporate Policy 207 \(Global Policy on Interactions with Healthcare Professionals\)](#)
- [Global Content Policy – Commercial Standards for Promotional Materials](#)
- [GCO Policy Exchange](#)



The definition of **“healthcare professional”** includes physicians, nurses, pharmacists, and any others who administer, prescribe, purchase, recommend, or are in a position to influence the use of our products.

With Our Products and Product Development

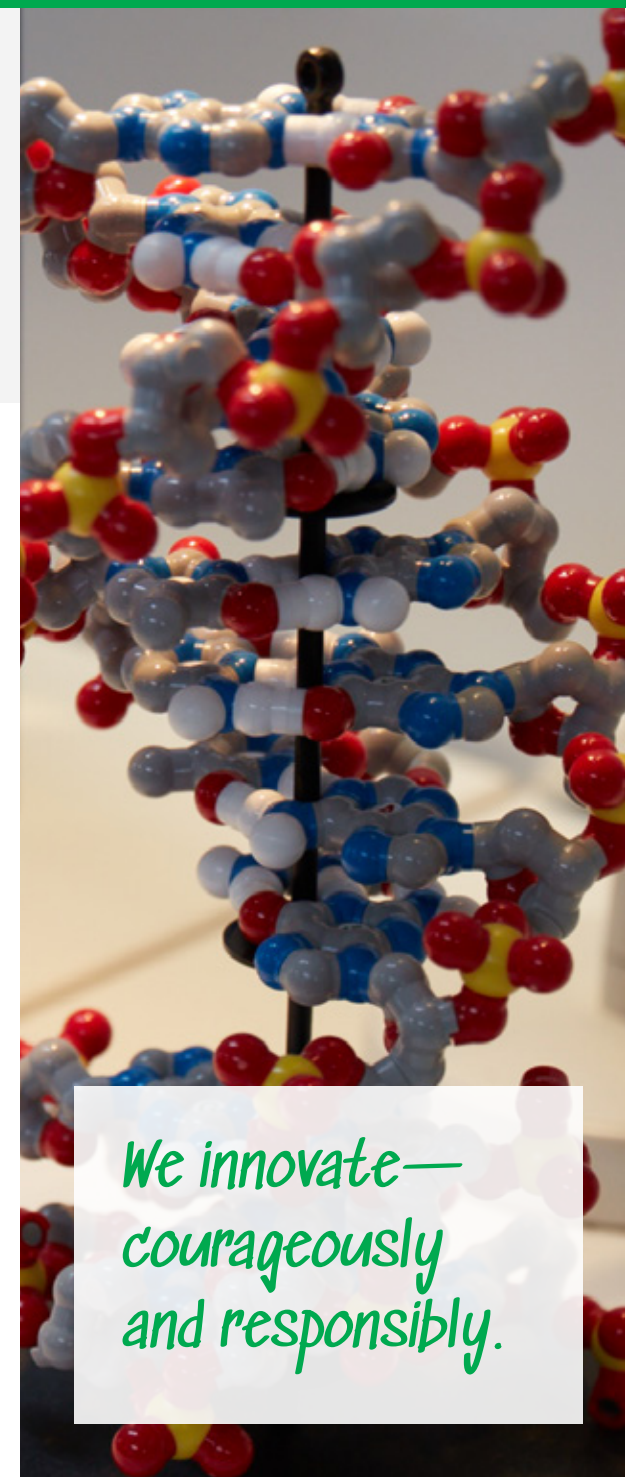
Research and Development

Our purpose is to bring innovative 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 our research and development activities.

We are all responsible for acting in a manner consistent with Pfizer's high expectations for excellence and integrity in research and development.

Our Commitment to EXCELLENCE

- We are committed to conducting our research and development in compliance with all applicable laws and regulations and ethical guidelines related to good laboratory practices (GLP) and good clinical practices (GCP).
- We are committed to maintaining the integrity and quality of clinical data from our sponsored studies to ensure that our regulatory submissions are founded on data of the highest quality.
- We are committed to protecting the health, well-being, and safety of research participants.
- Whenever possible, we seek alternatives to animal testing and support the development and adoption of non-animal validated test methods to assess the safety and efficacy of potential new products. Where animal testing is needed, we maintain high standards of animal care and welfare consistent with or exceeding those required by law and relevant external oversight bodies.



*We innovate—
courageously
and responsibly.*

With Our Products and Product Development

Manufacturing and Supply Quality

Our patients rely on Pfizer products to improve health and enhance the quality of their lives. This can only happen if our products are of high quality, safe, and effective.

We are committed to ensuring that our products are manufactured and supplied to high standards of quality, safety, and efficacy, assured through deployment of our robust quality management systems and our focus on the integrity of our data.

Our Commitment to EXCELLENCE

- We conduct manufacturing operations in compliance with applicable regulatory requirements, good manufacturing practices (GMP), and our internal rigorous quality standards.
- We require that suppliers and partners operate in compliance with applicable regulatory requirements and GMP standards, and we conduct audits and oversight of our supply chain to ensure the quality, safety, and efficacy of our products.



[Learn More](#)

- [Corporate Policy 114 \(Corporate Quality Policy\)](#)

We keep quality and integrity at the heart of what we do, always.

With Our Products and Product Development

Data Integrity

As a science-based Company, the integrity of our data is of critical importance. Its accuracy, completeness, and trustworthiness provide assurance to our regulators, patients, and customers that our products and processes are of the highest quality—safe, effective, and protective of our patients, employees, and communities.

We maintain the integrity of our data using five key principles: Attributable, Legible, Contemporaneous, Original, and Accurate (the ALCOA principles). When our data is recorded in a manner consistent with ALCOA, it means that who recorded the data is known (attributable); that it can be reliably read, viewed, or used (legible); that it was recorded at the time of the event (contemporaneous); that it is the source or authentic record and not an unauthorized copy (original); and that it is accurate.

Safety Reporting

We are committed to providing products that are safe, effective, and of the highest quality. That is why we all share responsibility for reporting safety, quality, and performance issues concerning Pfizer products, no matter how we learned of the issue.

If you become aware of an adverse event or other issue with a Pfizer product, make a product safety report within 24 hours of receiving the information.



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 of learning about it.



Learn More

- [Corporate Policy 903 \(Your Responsibility to Report Information About the Safety, Quality, and Performance of Pfizer Products\)](#)
- [Your Reporting Responsibility \(YRR\) website](#)
- [How to Report](#)

We always do the right thing—because patients' lives depend on us.

In How We Conduct Our Business

Business Partners and Suppliers

We work with third parties—suppliers, distributors, and other business partners—around the world to help us achieve our strategic goals. Engaging with third parties, however, can create compliance, financial, safety, information security, and other risks. These risks may result in operational disruption, regulatory penalties, or reputational damage. Performing due diligence and responsible selection and management of our third parties is core to how we do business. Pfizer holds its business partners to high standards, and they must comply with all laws and relevant policies and procedures that apply to their work conducted on Pfizer's behalf.

Our Commitment to EXCELLENCE

- We carefully manage risks related to engaging third parties, including through controls, and policies that help us identify, assess, and mitigate the risks we may encounter.
- We partner with external suppliers that are committed to operating in a responsible and ethical manner, respecting the rights of the individuals they employ, and helping to protect the environment.
- We expect our suppliers to operate in a manner consistent with our Supplier Conduct Principles and the Pharmaceutical Supply Chain Initiative (PSCI) Principles for Responsible Supply Chain Management.



Learn More

- [Corporate Policy 113 \(Environmental Health and Safety Policy\)](#)
- [Pfizer Supplier Conduct Position Statement](#)
- [Pfizer Supplier Conduct Principles](#)
- [My Anti-Corruption Policies and Procedures \(MAPP\)](#)
- [Third Party Risk Management \(TPRM\) Resource Center](#)

In How We Conduct Our Business

We innovate with a risk management mindset.

Conflicts of Interest

We are accountable for avoiding situations that present potential or perceived conflicts of interest between our personal interests and those of Pfizer. A conflict of interest arises when we place our personal, social, financial, or political interests before the interests of the Company.

Many potential conflicts of interest can be resolved. First, we must disclose any potential conflicts to our managers. Managers must then determine next steps, including consulting with Legal, Compliance, and Human Resources when potential conflicts are significant or complex.

Contact your manager or Compliance to disclose the potential conflict. Together you can determine the best solution.

Our Commitment to EXCELLENCE

- We do not allow outside businesses or other interests to affect our objectivity, motivation, or performance.



Potential conflicts of interest include:

- Employment with a competitor or potential Pfizer customer or supplier
- Investing in a Pfizer supplier
- Having a family member that owns a supplier that Pfizer might use, even if you do not have decision-making authority
- Receiving a gift from a business associate or supplier of Pfizer, or someone who is seeking to work with Pfizer
- Serving on a board of a company, including a local non-profit in the healthcare industry
- Otherwise taking advantage of Pfizer's corporate opportunities for personal gain



Learn More

- Corporate Policy 203 (Conflicts of Interest (COI) Policy and local and divisional COI policies and procedures)
- My Anti-Corruption Policy and Procedures (MAPP)
- Corporate Policy 301 (Travel, Entertainment and Other Business-Related Expenses)
- Corporate Policy 102 (Purchasing Policy and Procedure)

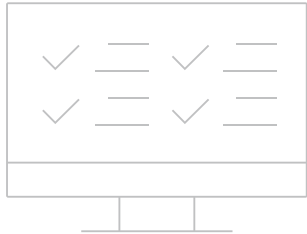


In How We Conduct Our Business

Company Assets, Records, and Information

One way we protect Pfizer, each other, and our patients is by protecting Company assets. These assets include, for example, physical and intellectual property, equipment, services, records, ideas, and Pfizer sensitive information.

We are accountable for ensuring appropriate use of Pfizer systems and networks to securely create, transfer, or store Pfizer-related business information. This includes connecting only approved technologies, devices, and applications to the Company network.



Our Commitment to EXCELLENCE

- We secure all confidential information, whether spoken or written, when working remotely or in an open environment, and dispose of information properly.
- We use only authorized software, devices, and applications approved by Pfizer.
- We limit our personal use of Pfizer information systems.
- We comply with Pfizer's corporate policies regarding safeguarding sensitive information, record retention, information incident reporting, and cybersecurity.



Pfizer must protect our information and operations from misuse, data breaches, and other security threats, which can have serious negative consequences to the Company, our employees, and our customers. In accordance with applicable law, Pfizer uses a variety of tools and processes to monitor and assess the use of and to help protect Pfizer information systems and data.



Prohibited activities: You may not use Pfizer information systems or devices to:

- Harass, discriminate, or create a hostile workplace
- View or otherwise post data that is defamatory, illegal, pornographic, or obscene
- Perform activities that interfere with work or result in the loss or damage of work or systems
- Solicit colleagues for any unauthorized purpose
- Record communications without authorization



Take appropriate precautions to protect your Pfizer devices and data, even within Pfizer facilities. If you work in an open space environment, activate the system lock when leaving the device. Do not leave your devices unattended in any location where security is not reasonably assured. In public settings, ensure that sensitive information cannot be viewed or overheard by others.



Learn More

- [Corporate Policy 401 \(Global Safeguarding Sensitive Information Policy\)](#)
- [Corporate Policy 403 \(Acceptable Use of Information Systems\)](#)
- [Corporate Policy 405 \(Records & Information Management Policy and Procedure\)](#)
- [Corporate Policy 411 \(Information Incident Response Policy\)](#)
- [Corporate Policy 412 \(Cybersecurity Policy\)](#)
- [Enterprise Records and Information Management](#)
- [Enterprise Record Retention Schedule](#)
- [Protect Pfizer](#)
- [Legal Hold Listing](#)

In How We Conduct Our Business

Intellectual Property

Protecting Pfizer's intellectual property is essential to maintaining our competitive advantage. We support the establishment, protection, maintenance, and defense of Pfizer's intellectual property rights and use those rights in a responsible way. We also respect the intellectual property of others.

Our Commitment to EXCELLENCE

- We enforce Pfizer's intellectual property rights in a responsible way.



Intellectual property includes patents, trademarks, trade dress, trade secrets, and copyrights, as well as scientific and technical knowledge, know-how, and experience.



If intellectual property is protected in one country, is it protected in other countries?

Not necessarily. For example, patents and trademarks are territorial rights. 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 a country.



Learn More

- [Copyright Compliance Guidelines](#)
- [Intellectual Property Portal](#)

In How We Conduct Our Business

Personal Data

We protect personal data, including that of colleagues, third parties, and customers. In addition to personal data of our colleagues for employment purposes, Pfizer also is entrusted with personal data for purposes of conducting research, pharmacovigilance, and other business activities.

We are accountable for protecting personal data and for only using that data in accordance with Pfizer's policies and procedures, and applicable laws and regulations.

Our Commitment to EXCELLENCE



- We collect and use the minimum amount of personal data necessary to achieve our business purposes and keep it only as long as necessary to achieve those purposes.
- We share personal data only with individuals who have a legitimate need for it and will protect it.
- We report concerns about the inappropriate disclosure of personal data to our managers and Pfizer's Global Security Operations Center (GSOC).



What if I must share personal data with third parties to meet business needs?

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



Learn More

- Corporate Policy 404 (Protecting the Privacy of Personal Data)
- Corporate Policy 411 (Information Incident Response Policy)
- Privacy Office: [privacy.pfizer.com](https://www.pfizer.com/privacy)
- GSOC: [datasecurity.pfizer.com](https://www.pfizer.com/gsoc)



Personal data is information that can directly or indirectly identify an individual, such as a name, contact information, or health-related and genetic information.

In How We Conduct Our Business

Financial Integrity

Accurate business records are essential to our business operations and safeguarding investor confidence, and we maintain strong internal controls to ensure the accuracy, completeness, and reliability of Company accounting records and publicly filed financial statements.

We each must ensure our business records are correct and accurately reflect our work—from time sheets and invoices, to expense reports and benefits records. We all must watch for suspicious or inaccurate transactions, invoices, or payments made to or on behalf of Pfizer. This helps Pfizer provide full, accurate, and timely financial and other disclosures to the public and governments around the world.

Social Media

One of the most powerful tools we have to communicate Pfizer's stories of innovation, patient centricity, and colleague commitment is social media. We are all accountable for using social media responsibly, whether creating or using social media in our personal lives or on behalf of Pfizer.

Our Commitment to EXCELLENCE

- We do not disclose material non-public information or other confidential, proprietary, or personal information on social media.
- We do not reference Pfizer products or content related to specific pipeline or in-line products on social media unless our use and reference has been approved by Legal.



[Learn More](#)

- [Corporate Policy 511 \(Integrity of Pfizer's Books and Records\)](#)
- [Corporate Policy 407 \(Social Media Policy\)](#)

*We achieve
Excellence
when we are
accountable for
our actions.*

In How We Conduct Our Business

We achieve
Excellence
when we know
our standards
and live by them.

External Inquiries

Government

We fully cooperate with government authorities in connection with proper requests for information. Non-routine government requests may expose Pfizer or colleagues to civil or criminal liability, so we immediately notify a member of the Legal Division, Government Litigation Group (within the Legal Division), and the Compliance Division if we are contacted by any government authority for such information at a Pfizer facility, at our homes, or otherwise.

Media, Analyst, Investor, and Public

We are committed to delivering accurate and reliable information to the media, financial analysts, investors, and other members of the public. Therefore, only Global Media Relations is authorized to answer questions from the media, and only Investor Relations is authorized to answer questions from financial analysts and investors.



Learn More

- Corporate Policy 602 (Requests for Information or Facility Visits)
- Corporate Policy 604 (Treatment of Material Non-Public Information)
- Media inquiries: Global Media Relations Press Office at +1-212-733-1226
- Analyst and investor inquiries, including those related to Corporate Governance: Investor Relations at +1-212-733-2668

In Following the Letter and Spirit of Laws

Our industry 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 demonstrate our commitment to Excellence by following all laws and regulatory requirements governing our activities, including in the development, manufacturing, distribution, marketing, government contracting, sale, and promotion of our products.

Anti-Corruption, Anti-Bribery, and Anti-Kickback Laws

We conduct our business in a transparent and ethical manner. Pfizer prohibits all forms of bribery and corruption, whether by colleagues or our business partners.

Colleagues and business partners must never offer, promise, authorize, or provide a payment or benefit that is intended to improperly influence a government official, healthcare professional, or any other person, including commercial entities and individuals, in exercising their responsibilities.

In our dealings with healthcare professionals employed by or affiliated with government or regulatory authorities, care is taken to ensure that such dealings comply with all applicable laws, regulations, professional requirements or industry codes of conduct or practice, including local transparency and anti-kickback regulations.

Our Commitment to EXCELLENCE

- We ask ourselves whether there is a legitimate purpose for entering into a transaction.
- We ensure that every transaction is of appropriate value and that every interaction is permitted under local rules.
- We exercise great care when engaging with government employees or private individuals who have real or perceived ability to affect decisions that impact Pfizer's business.
- We take ownership and responsibility in Pfizer's business activities, understanding the process and the risk, including potential appearance of impropriety. We are accountable and act accordingly.
- We accurately document all transactions in sufficient detail.



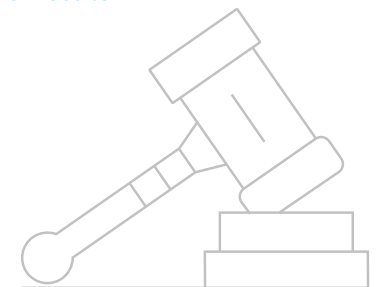
Why do I need to be well informed about my business partner?

Knowing our partners includes understanding healthcare professional and government official status and may also include understanding professional qualifications, employment position, and the ability to influence government decisions that could benefit Pfizer's business. We must ensure that our business partners meet Pfizer's high standards for expertise and integrity. We also must identify any real or perceived risks associated with our business partners. Collecting this information enables us to assess the appropriateness of our interactions, and identify and manage any risks.



Learn More

- [Corporate Policy 207 \(Global Policy on Interactions with Healthcare Professionals \(GPIHP\)\)](#)
- [My Anti-Corruption Policies and Procedures \(MAPP\)](#)
- [ACPO website](#)



In Following the Letter and Spirit of Laws

Antitrust, Fair Competition Laws & Competitive Intelligence

Antitrust and competition laws protect free enterprise and prohibit interactions between Pfizer and our competitors that affect prices, terms or conditions of sale, or fair competition. We ensure fair competition in all our business dealings, including, among other things, distribution agreements, rebates and discounts to customers, patent, copyright, and trademark licenses, territorial restrictions on resellers, and pricing policy generally.

We are committed to competing fairly and following the antitrust and competition laws of all countries in which we operate. Laws vary and are sometimes complex, so we consult with the Legal Division before interacting with competitors or engaging in business dealings which could unfairly restrict trade.

We also only collect and use business information about other companies in a manner that is ethical, lawful, and meets confidentiality obligations.

Our Commitment to EXCELLENCE

- We do not permit direct or indirect discussions or contact with competitors about pricing, costs, terms or conditions of sale, or other competitively sensitive information.
- We do not permit direct or indirect discussions or contact with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace
- We do not allocate markets or customers with competitors.
- We do not engage in the boycott of customers or suppliers.
- We never use, or ask any third party to use, unlawful or unethical means, such as misrepresentation, deception, theft, spying or bribery to gather information about our competitors.



Trade association meetings and other **industry gatherings** can pose certain risks, as they bring together competitors who might discuss matters of mutual concern. Even joking about inappropriate topics—such as marketing or pricing strategies—could be misinterpreted. If any kind of anti-competitive discussion arises, you should refuse to discuss the matter, leave the conversation immediately, and report the incident.



A friend and former Pfizer colleague now works for a Pfizer competitor. Is it okay to discuss how her company deals with managed care companies?

No. Competitively sensitive information may not be discussed with friends or former colleagues employed by competitor companies, whether in a business or a social setting.



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 someone 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.



Learn More

- [Corporate Policy 603 \(Compliance with Antitrust Laws\)](#)
- [Corporate Policy 121 \(Competitive Intelligence Policy and Procedure\)](#)

In Following the Letter and Spirit of Laws

Insider Trading Laws

Securities laws and Pfizer policy prohibit us from disclosing or using any material non-public or “inside” information that we acquire during our employment at Pfizer.

We do not use material, non-public information 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, research partner or potential acquisition or collaboration candidate), before this information is known publicly. We also do not give inside information to anyone else so that they can do so.

Global Trade Control Laws

We are all responsible for complying with import, export control, and economic sanctions laws that govern the transfer of certain products, items, software, and technology, as well as the performance of some services and interactions with third parties. Global trade control laws may restrict Pfizer’s sales, investments, transactions, research, charitable contributions, and business activities with certain markets, entities, or individuals.

We direct all questions or concerns about global trade control laws to Pfizer’s Global Trade Control Center of Excellence.



I am working with a co-promote partner, and I’ve become aware that our partner is on the verge of a major scientific breakthrough. Can I purchase some stock in our partner?

No. Neither you nor anyone who lives in your household or is financially dependent on you can purchase this stock until the first business day after the information you have is known to the public. You also cannot give this information to anyone else so that they can trade on that information.



Material information is any information that a reasonable investor would consider important in deciding whether to buy, sell, or hold securities.

Information is considered non-public until it has been adequately disseminated to the public and the public has had time to absorb the information.



Learn More

- [Corporate Policy 604 \(Treatment of Material Non-Public Information\)](#)
- [Corporate Policy 401 \(Safeguarding Corporate Proprietary/Confidential Information\)](#)
- [Corporate Policy 605 \(Trading in Pfizer Stock Derivatives\)](#)
- [Corporate Policy 206 \(Compliance with Global Trade Control Laws\)](#)
- [Global Trade Controls Center of Excellence](#)

EQUITY & JOY

We Respect Human Rights
We Prioritize Health and Safety, and Protect the Environment
We Support the Communities in Which We Work
We Embrace Diversity, Equity & Inclusion
We Do Not Tolerate Discrimination, Harassment, or Retaliation



Pfizer is committed to fairness, cooperation, teamwork, and trust. We do not tolerate hostility, harassment, or retaliation. Our global policies prohibiting all forms of inappropriate behavior are intended to create a workplace that promotes a positive and productive environment that is Equitable and Joyful for all.

This commitment to promoting Equity and Joy extends beyond our workplace to the communities in which we operate and the patients we serve. Pfizer is committed to sustainable and ethical business operations. We recognize the importance of Environmental, Social and Governance (ESG) issues as part of our overall business strategy and work to integrate ESG perspectives into our decision-making and governance processes. We are committed to respecting human rights, taking responsible climate action, reducing our environmental impact, lessening healthcare disparities, and ensuring health, safety, diversity, inclusion, fairness, cooperation, and trust across our operations and supply chain.



We Respect Human Rights

Pfizer is committed to conducting business in an ethical and responsible manner, which includes respecting internationally recognized human rights. In honoring our commitment, we seek to prevent and mitigate adverse human rights impacts in our global operations, and remediate any adverse human rights impacts we may inadvertently cause or perpetuate. Wherever we can, we also seek to advance human rights. Our approach to human rights risks is informed by international standards, industry best practice, and expert assessments.

Our Commitment to EQUITY

- Our responsibility to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local suppliers.
- In line with the UN Guiding Principles on Business and Human Rights, Pfizer's human rights policy statement focuses on addressing risks that could have the most severe impact on people: our patients, our colleagues, the workers of our business partners, and the communities in which we operate.



Human rights are fundamental rights and freedoms that all people are entitled to, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. These rights are enshrined in the International Bill of Human Rights and other international treaties and instruments.



Learn More

- [Human Rights Policy Statement](#)
- [Human Rights FAQ](#)

We Prioritize Health and Safety, and Protect the Environment

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 of Excellence and Equity. We are committed to integrating climate action and sustainability into the lifecycle of our medicines to address global health challenges and preserve resources for future generations.

Our Commitment to EXCELLENCE & EQUITY

- We are committed to running safe, compliant, and sustainable operations that comply with Environmental, Health and Safety (EHS) laws and internal standards.
- We actively seek and act upon meaningful opportunities to reduce risk and improve our EHS performance.
- We are committed to selecting business partners with consideration of their ability to run safe and environmentally responsible operations.
- We are committed to educating, training, and motivating colleagues to work in a safe, compliant, and environmentally responsible manner.



[Learn More](#)

- [Corporate Policy 113 \(Environment, Health, and Safety Policy\)](#)
- [Global Environment, Health & Safety Standards](#)

We take pride and feel Joy in our reputation for integrity.

A photograph of two women, one with long brown hair and one with dark hair in braids, both wearing patterned shirts, leaning over a raised garden bed and tending to green plants. The background shows a clear blue sky and some buildings.

We Support the Communities in Which We Work

We are committed to actively participating in and improving the communities in which we do business. We believe better health is possible for everyone, everywhere. We seek to improve the well-being of people through responsible business actions and through sustainable social investments designed to improve access to medicines, vaccines, and quality health services and to reduce healthcare disparities.

Our Commitment to EQUITY & JOY

- We believe that people are the heart of Pfizer, and for our colleagues, contributing does not begin and end in the workplace.
- We apply our research, medicines, vaccines, funds, and the expertise of our people to make a meaningful difference in people's lives.
- Through partnerships with organizations, governments, and foundations, we work to address health disparities, create bridges and connections, and break down barriers to improve access to quality healthcare in our communities at home and abroad.
- We place colleagues in short-term fellowships with international organizations to bring about meaningful and systematic improvements in healthcare.
- We find power and strength in community by coming together in the places we live and work to contribute financial support, time, and expertise.



[Learn More](#)

- [Corporate Policy 801 \(Global Charitable Contributions Policy\)](#)
- [Commitment to Global Health](#)
- [Global Health Fellows](#)

We Embrace Diversity, Equity & Inclusion

At Pfizer, Equity means that every person deserves to be seen, heard, and cared for. This happens when we are inclusive, act with integrity, and reduce healthcare disparities.

We celebrate our differences with Joy and take action to advance diversity across our workforce and our business. We also are committed to ensuring that our workforce and business model reflect the diversity of the patients we serve, by employing a diverse array of colleagues, engaging diverse suppliers, and including diverse individuals in our research and clinical studies.

We are committed to providing equal employment opportunities to all of our job applicants and colleagues, and we treat them 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 or veteran status, medical condition (as defined by applicable law), presence of a mental or physical disability, or other characteristics protected by applicable laws.

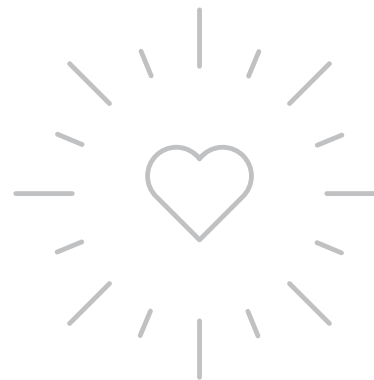
Our Commitment to EQUITY & JOY

- We expect our managers to promote standards of equitable employment and to report any potential violations of Pfizer's Equal Opportunity Policy.
- We seek out and hire diverse talent by partnering with external organizations that provide rich engagement opportunities with people of varying backgrounds, ethnicities, and other unique traits.
- We celebrate the unique qualities, perspectives, and life experiences that define us as individuals, and maintain a robust Supplier Diversity Program so that underrepresented or disadvantaged businesses have an equal opportunity to compete for our business.
- We include individuals of varied races, ethnicities, ages, and genders in clinical trials to help improve the completeness and quality of demographic subgroup data reporting and analysis.



[Learn More](#)

- [Corporate Policy 703 \(Equal Opportunity Policy\)](#)
- [Corporate Policy 103 \(Pfizer Supplier Diversity Initiative\)](#)



We advance Equity when we seek diverse perspectives.

We Do Not Tolerate Discrimination, Harassment, or Retaliation

We promote and value a work environment free of discrimination, harassment, and retaliation, including bullying and mobbing as defined by applicable laws. All workplace decisions are made without regard to personal characteristics protected by applicable laws.

Our managers must maintain a work environment that is free of harassment, discrimination, retaliation, and bullying, and must report any such conduct of which they become aware.

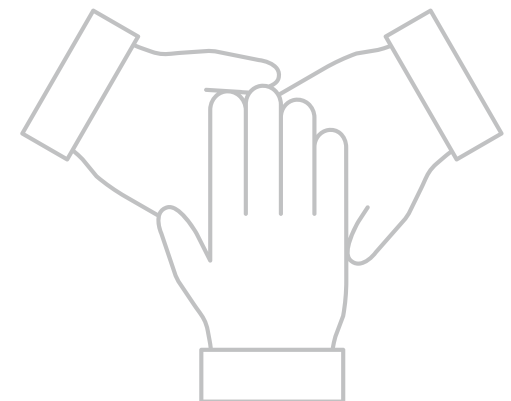
Our Commitment to EQUITY

- We promote a work environment free from harassment, including any unwelcome comments, behaviors, actions or conduct that denigrates or demonstrates hostility based on protected personal characteristic.
- We prohibit conduct that creates an intimidating, hostile or offensive working environment, or unreasonably interferes with an individual's ability to work.



[Learn More](#)

- [Corporate Policy 703 \(Equal Opportunity Policy\)](#)



We champion Equity when we act with integrity.

A large, stylized graphic of a DNA double helix. The left half of the helix is solid blue, while the right half is a white wireframe structure. The helix is positioned diagonally across the page, with the top left corner being a solid blue rectangle.

BREAKTHROUGHS that change patients' lives