



SALES & MARKETING

HIGHLIGHTS

Began disclosing all funding in the U.S. for medical education grants and other support to medical and patient organizations in May 2008.

Committed to new PhRMA Code on Interactions with Health Care Professionals (HCP), in January 2009, reinforcing highest ethical standards in interactions with health care professionals.

Committed to updated PhRMA Guiding Principles on Direct to Consumer (DTC) Advertising About Prescription Medicines, effective March 2009, reflecting strengthened commitment to DTC communications that best serve the needs of patients, consumers and the health care community.

Ethical Marketing

We believe that ethical conduct begins by providing employees the guidelines along with tools to understand them, and how they apply to the work that we do. At Pfizer, our sales and marketing employees must follow a number of guidelines, all of which are available on the *Responsibility* section of www.pfizer.com. All sales employees receive training on health care ethics as well as product and disease knowledge. The primary objective of our sales force is to provide accurate medical and product information so that physicians can make informed treatment decisions. Therefore, all members of the sales force are expected to know the medical foundation of diseases and treatments, as well as the latest research findings on Pfizer and competitors' products. Specific health care law compliance, including effective documentation, is also a major part of training for sales employees around the world. All Pfizer colleagues in sales, marketing and management are required to complete ethics training and pass a test on ethics and compliance every year.

The new PhRMA HCP Code (www.phrma.org/code_on_interactions_with_health_care_professionals) adds an

Pfizer is committed to responsibly promoting our products. We believe that it is important to educate patients and providers about new health care treatments. However, we also acknowledge stakeholders' concerns that sales and marketing practices need to provide accurate information, and that physicians who prescribe our products not be influenced by anything other than the merits and value of the medicine being marketed. Pfizer follows an approach to sales and marketing that starts with integrity in our business practices, transparency in our reporting about these practices, and compassion for those who find it difficult to afford our medicines.

additional level of oversight rigor for sales and marketing ethics in the U.S. Companies now have the opportunity to complete an annual certification signed by the CEO and the CCO to announce support of the Code and to confirm that they have processes and procedures in place to assure compliance. The PhRMA DTC Guiding Principles (www.phrma.org/dtc) have a similar pledge from members to abide by the Principles.

We will continue to evaluate opportunities to monitor our performance against the highest standards and submit to periodic third-party audits to ensure that we are meeting our goals.

Interactions with Health Care Professionals

At Pfizer, we believe that interactions with health care professionals should be founded on three principles:

1 PRIMACY OF THE HEALTH CARE PROFESSIONAL/PATIENT RELATIONSHIP
We recognize that the primary duty of practicing health care professionals is to their patients. Therefore, our relationships with health care professionals must support, and be consistent with, the professional and fiduciary responsibilities health care professionals have to their patients. Fundamentally, our interactions with health care professionals must advance patient care and support the ethical and compassionate practice of medicine.

2 CORPORATE RESPONSIBILITY
Facilitating access to quality health care is a fundamental responsibility of governments, but to succeed, all stakeholders (including industry, health care professionals and patients) must work together. We are committed to doing our part—by developing new medicines designed to prevent, treat or cure disease, by working with other stakeholders to make medicines and health care information available to patients and health care professionals, and by supporting the creation and implementation of sustainable health care solutions.

3 TRANSPARENCY
We recognize that our interactions with health care professionals can give rise to apparent or actual conflicts of interest. We support the disclosure of financial and other interests and relationships that may create apparent or perceived conflicts of interest in research, education or clinical practice. In addition, in our dealings with health care professionals employed by, or affiliated with, government or regulatory authorities, care will be taken to ensure that they comply with all applicable laws.

In 2006, we adopted *Pfizer's Global Policy on Interactions with Healthcare Professionals* which incorporates common legal and ethical standards from many of Pfizer's major markets, including the U.S. (Pfizer White Guide, PhRMA Code) and around the world (EFPIA Code on Promotion of Medicines, IFPMA Code of Pharmaceutical Marketing Practices) and applies them to our operations in 180 countries.

PROMOTIONAL ACTIVITIES

Pfizer is committed to accuracy and transparency in the promotion of medicines to health care professionals. By providing substantiated information about the usage, safety, efficacy and other aspects of the clinical profile of our medicines, Pfizer helps health care professionals use our products safely and effectively. We train our sales representatives to provide not only information on the benefits of our medicines, but also information on when our products should not be used, what side effects or adverse reactions have been described, and other warnings or precautions about their use.

Samples of Pfizer medicines are termed “starters” and provided to health care professionals in accordance with local laws so that patients and their health care professionals can become familiar with the medicine. Pfizer maintains strict

guidelines on the use of starters, including bans on using starters to solicit or reward prescribing practices, providing starters for health care professionals’ personal use, or selling, purchasing or trading starters. All Pfizer businesses providing starters track and maintain records on all samples provided.

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Direct to Consumer Advertising

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who prescribe our products not be influenced by anything other than the merits and value of the medicine being marketed. Pfizer follows an approach to sales and marketing that starts with integrity in our business practices, transparency in our reporting about these practices, and compassion and support for those who find it difficult to afford our medicines.

We believe that responsible consumer advertising has significant and proven value to help consumers identify disease conditions and engage in more informed conversations with their health care providers. These conversations can result in life-changing diagnoses and treatment decisions. Pfizer supports the continuing ability to provide information to consumers about medicines, but we acknowledge that some stakeholders have concerns about consumer advertising of prescription medicines.

PUBLIC POLICY

Disclosing Payments to Health Care Professionals

At Pfizer, clear and candid relationships with health care professionals are of paramount importance to our business. In furtherance of this objective, in 2009, we announced plans to make publicly available our compensation of U.S. health care professionals for consulting, speaking engagements and clinical trials. The disclosure will include payments made to practicing U.S. physicians and other health care providers, as well as principal investigators, major academic institutions and research sites for clinical research. This makes Pfizer the first biopharmaceutical company to commit to reporting payments for conducting Phase I–IV clinical trials in addition to disclosing payments for speaking and consulting. Pfizer is committing to share this information in order to provide greater clarity and understanding of the valuable scientific innovations and improved patient care that result from these collaborations with health care professionals.

These kinds of collaborations are an essential part of medical progress and without them we would not be able to continue delivering the medical innovations that the global health community has come to expect.

In 2008, we collaborated with almost 8,000 clinical investigators to conduct more than 280 studies to better understand how our medicines can be safely and effectively used to the benefit of patients. Pfizer makes payments to investigators and research institutions to compensate them for the work done on the company’s behalf. As part

of this initiative, we will ensure that payments are posted in an accurate, clear and consistent manner that clearly demonstrates the recipient name or institution, the payment made and the service provided.

Pfizer’s plans reflect the spirit of recent proposed legislation regarding payments to physicians in that it includes payments to practicing physicians and other health care providers as well as to principal investigators and institutions for Phase I–IV clinical trials sponsored by Pfizer. We plan to publish our first annual online update on www.pfizer.com in early 2010. The report will include payments made from July 1, 2009, going forward. Parameters under consideration include reporting payments to recipients whose aggregate amount exceeds \$500 in a calendar year, including the value of non-monetary items, such as meals, that exceed \$25 in value.

Specifically, this includes disclosing all payments to all practicing health care providers who can prescribe medicines, major institutions for ongoing clinical trials, and principal investigators and other entities for Phase I–IV clinical trials sponsored by Pfizer beginning after July 1, 2009.

The payments include those for clinical development and commercial consulting, promotional speaking, Phase I–IV clinical trials, investigator-initiated research and meals and other non-monetary items.

Pfizer is dedicated to ensuring that consumer communications are accurate, evidence-based, reflect an appropriate balance of risk/benefit information, and are consistent with FDA labeling. We continue to evolve our approach to DTC advertising in consultation with stakeholders. We have reaffirmed our commitment to adhere to and exceed industry standards as outlined by the *PhRMA Guiding Principles on Direct-to-Consumer Advertising About Prescription Medicines*. Some highlights of our approach include more extensive, systematic engagement with health care professionals to get their feedback on new campaigns early in our development process. We are also committed to ensuring greater clarity in our advertising regarding the presentation of health care professionals as representatives. In addition, our CEO and Chief Compliance Officer sign an annual certification pledge to uphold the PhRMA Principles. We voluntarily submit our new TV advertising to the FDA for their review prior to airing and educate physicians about a new product for at least six months after product approval and before introducing branded broadcast and print advertisements so that physicians are equipped with accurate information to discuss medicines with patients.

These changes are a natural progression of Pfizer's commitment to make our consumer communications more effective in motivating patients to talk with health care professionals and as part of our overall commitment to provide the right information to stakeholders. We will continue to seek ways to provide health care information to patients in meaningful ways and be responsive to all stakeholders.

LOOKING FORWARD

As the science of medicine continues to advance, Pfizer will maintain our dedication to responsibly educating physicians and patients about innovations in health care and how to use our portfolio of prescription medicines safely and effectively. Over the next two years, we will build upon our past disclosure efforts by beginning to disclose payments to individual health care providers for their work with us.

As Pfizer becomes an increasingly global company, we will also continue to examine, evaluate and, where appropriate, revise our sales and marketing policies to ensure that our practices in emerging markets meet the same high standards for transparency and accuracy we have in more mature markets.

Also, we recognize that health care reform measures in the U.S. and around the world may impact the current standard for relationships between patients and physicians. We will monitor the impact of changes to health care systems and adjust our sales and marketing policies accordingly to ensure that principles are upheld.