

Global Policy
on Interactions With
Healthcare Professionals






Global Policy on Interactions with Healthcare Professionals

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Pfizer is committed to collaborating with physicians and other healthcare professionals to develop new medicines, to educate healthcare professionals about our medicines and to share clinical experience with the use of our medicines. Our mission is to be the most valued company to patients, customers, colleagues, investors, business partners and the communities where we work and live. This ambitious mission reflects the broader role society expects Pfizer to take in improving the human condition.

We are committed to ensuring that our educational and promotional efforts benefit patients and that our programs and collaborations do not have, or appear to have, an undue influence on medical judgment or prescribing. To this end, we are guided by our company value of *Integrity*, our high ethical standards and our commitment to compliance with applicable legal, regulatory and professional requirements in the countries in which we operate. Our relationships with healthcare professionals, including our interactions with physicians, nurses, pharmacists and others who administer, prescribe, purchase or recommend prescription



medicines, must meet the highest standards of integrity and must comply with applicable laws and regulations.

To that end, Pfizer has adopted this *Global Policy on Interactions with Healthcare Professionals*. This *Global Policy* governs Pfizer human pharmaceutical operations around the world, including marketing, medical, sales and research and development operations. Interactions with healthcare professionals will be guided by

this *Global Policy*, as well as by applicable laws, regulations, professional requirements and industry standards.

In all cases, Pfizer operations around the world must comply with local laws. In the event of a conflict between this *Global Policy* and applicable laws, regulations, professional requirements, or industry standards, the more restrictive provision applies.

Principles

Primacy of the Healthcare Professional-Patient Relationship

■ We recognize that the primary duty of practicing healthcare professionals is to their patients. Therefore, our relationships with healthcare professionals must support, and be consistent with, the professional and fiduciary responsibilities healthcare professionals have to their patients. Fundamentally, our interactions with healthcare professionals must advance patient care and support the ethical and compassionate practice of medicine.

Corporate Citizenship

■ Facilitating access to quality healthcare is a fundamental responsibility of governments, but to succeed, all stakeholders (including industry, healthcare 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 healthcare information available to patients and healthcare professionals and by supporting the creation and implementation of sustainable healthcare solutions.






Transparency

■ We recognize our interactions with healthcare 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 healthcare professionals employed by, or affiliated with government or regulatory authorities, care will be taken to ensure that they comply with all applicable laws.



Global Standards

Medical Information Communications




■ Pfizer's Medical Information Departments are designed to respond to inquiries from healthcare professionals about the use of our medicines. In providing this information about our medicines, we strive to ensure that such communications are accurate, substantiated, scientifically rigorous and consistent with applicable legal and regulatory standards. In addition, when providing scientific information not contained in the approved package insert or marketing authorization, Pfizer colleagues must avoid

promoting any off-label use, directly, indirectly or through third parties.

Promotional Activities

■ We promote our medicines to healthcare professionals by providing substantiated information about the usage, safety, effectiveness and other aspects of the clinical profile of our medicines. In particular, we provide information on the benefits as well as the contraindications, side effects and warnings related to our



medicines. Our promotional activities with healthcare professionals must help them diagnose, treat or prevent disease. In addition, our promotional materials must be accurate, substantiated, scientifically rigorous and consistent with applicable legal and regulatory standards. When describing the uses, effectiveness, safety and other aspects of our medicines, Pfizer colleagues and retained healthcare professionals must take care to avoid promoting off-label uses directly, indirectly or through third parties.




Disease Awareness Communications and Consumer Advertising

■ Disease awareness communications and direct to consumer product advertising are designed to help patients make informed choices about their health. All of our product communications and advertising must be educational, informative, accurate, substantiated, scientifically rigorous and consistent with applicable legal and regulatory standards.

Privacy of Health Information

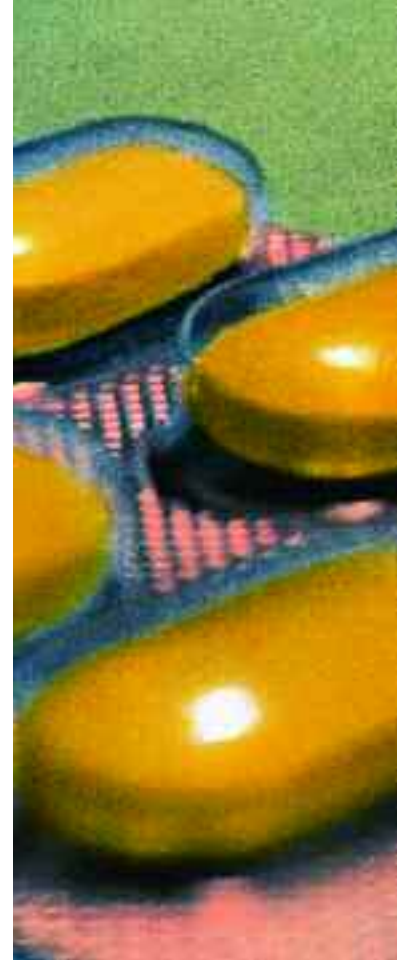
■ We recognize that patient health information deserves to be treated with respect and sensitivity and that patient privacy must be protected. Pfizer generally does not obtain patient health data unless we have individual consent to obtain and use the information (as in the context of clinical trials) or unless the personal data is de-identified or aggregated. In some instances, Pfizer may obtain identifiable

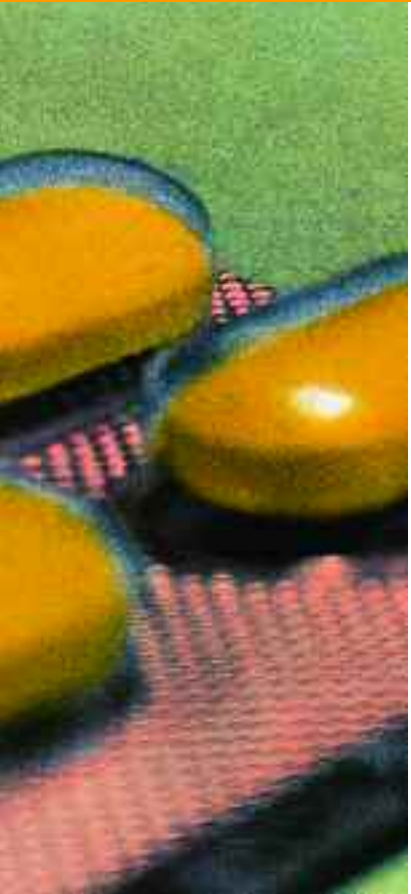


patient health information without individual consent, but only as permitted by law, for example, in connection with important public health objectives (as in the collection of information on adverse events) or to further research (for epidemiological research using healthcare databases). Pfizer requires that personal data in its care be protected appropriately, in compliance with applicable data privacy laws and regulations.

Product Samples

■ Product samples of Pfizer medicines may be provided to healthcare professionals in accordance with applicable laws. In markets where permitted, free samples of Pfizer medicines are provided to healthcare professionals for distribution to their patients so that patients and their healthcare professionals can become familiar with the medicines. Product samples may not be offered or given to solicit or reward prescribing practices. Samples may not be sold, purchased, traded or offered for sale, purchase or trade. They may not be used






as gifts or provided to healthcare professionals for their personal use or for any purpose other than free distribution to patients. Pfizer businesses providing samples must track and maintain records on all samples distributed.

Support for Third Party Medical Meetings and Conferences

■ Pfizer provides unrestricted educational grants or funding to third party organizations to support medical education

and medical conferences. The main purpose of medical congresses, conferences, symposia and similar programs supported by Pfizer must be scientific exchange and/or medical education. Such third party conferences must be held in an appropriate venue that is conducive to the main purpose of the meeting. Hospitality offered in connection with the event must be appropriate and will not include Pfizer support or organization of entertainment (e.g., sporting or leisure) events. In addition, Pfizer will not provide financial



support for attendance by spouses or guests (unless qualified in their own right to attend). In no instance will Pfizer provide financial support as an inducement for a healthcare professional to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.

Pfizer sponsorship of non-U.S. healthcare professional attendance at third party medical conferences or similar meetings is limited to support for travel, meals, accommodation and registration.

Pfizer-Hosted Educational and/or Promotional Meetings

■ Pfizer-hosted educational and promotional meetings are designed to educate healthcare professionals about our medicines. All such meetings must be focused on education. Hospitality offered in connection with such meetings must be appropriate and will not include Pfizer-sponsored entertainment (e.g., sporting or leisure) events. Meetings should be held in appropriate venues conducive to the main purpose of the meetings and, where practical, near where the majority of the attendees live or work.






In addition, Pfizer will not provide financial support for attendance by spouses or guests (unless qualified in their own right to attend). In no instance will Pfizer provide financial support as an inducement for a healthcare professional to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.

Consultant Meetings and Use of Healthcare Professional Consultants

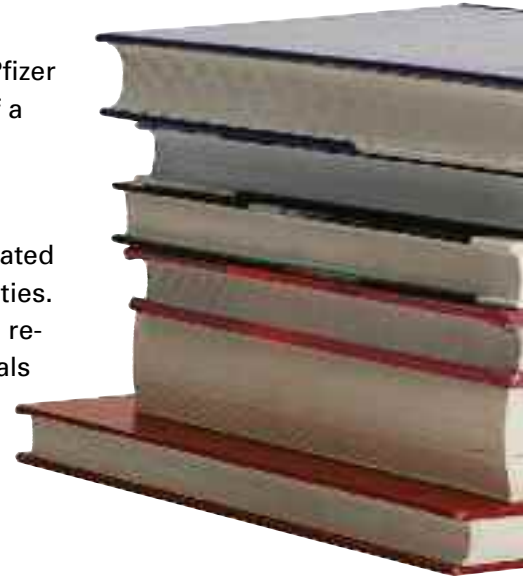
Qualified healthcare professionals may be hired as consultants to provide bona fide services, such as assisting in the development of medicines, participating in clinical trials or other research, speaking at sales presentations or conferences or training Pfizer colleagues. Payments to healthcare professionals for such services may not exceed the fair market value of the services provided. The venue and circumstances of any consultant meeting must be conducive to the consulting services. Activities related to the



consulting services must be the primary focus of the meeting. Pfizer will only pay for the reasonable expenses (e.g., travel, meals, accommodation and registration) incurred by a consultant who attends a scientific conference or third party meeting in a professional capacity related to, or on behalf of, Pfizer. In no instance will Pfizer retain any healthcare professional, regardless of qualification, as an inducement for such healthcare professional to use,

prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.

In some countries, many healthcare professionals are employed by or affiliated with government or regulatory authorities. Pfizer is committed to ensuring that its relationships with healthcare professionals are appropriately reviewed to ensure compliance with Pfizer policies and applicable laws.






Practice-related and Other Items

■ Items related to the practice of medicine may be provided free of charge to healthcare professionals provided such items are not of significant value. An inexpensive item may be given on an occasional basis, if allowed by local law and industry practice, as part of customary interactions with a customer. In each case, Pfizer colleagues may not offer healthcare professionals any item of significant value or any item as an inducement for such healthcare professional to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.





Educational Grants

 Pfizer provides educational grants to support bona fide independent educational programs. Pfizer supports these programs to facilitate life-long learning by healthcare professionals, ultimately to enhance patient care. Requests for Pfizer funding are reviewed based on their merits. Such funding may not be used to influence or reward the

recipient for present, past or future use or support of Pfizer medicines or to influence the outcome of clinical trials.

In addition to complying with local laws, independent medical education programs must contain scientifically rigorous content and disclose the fact that Pfizer is providing financial support.





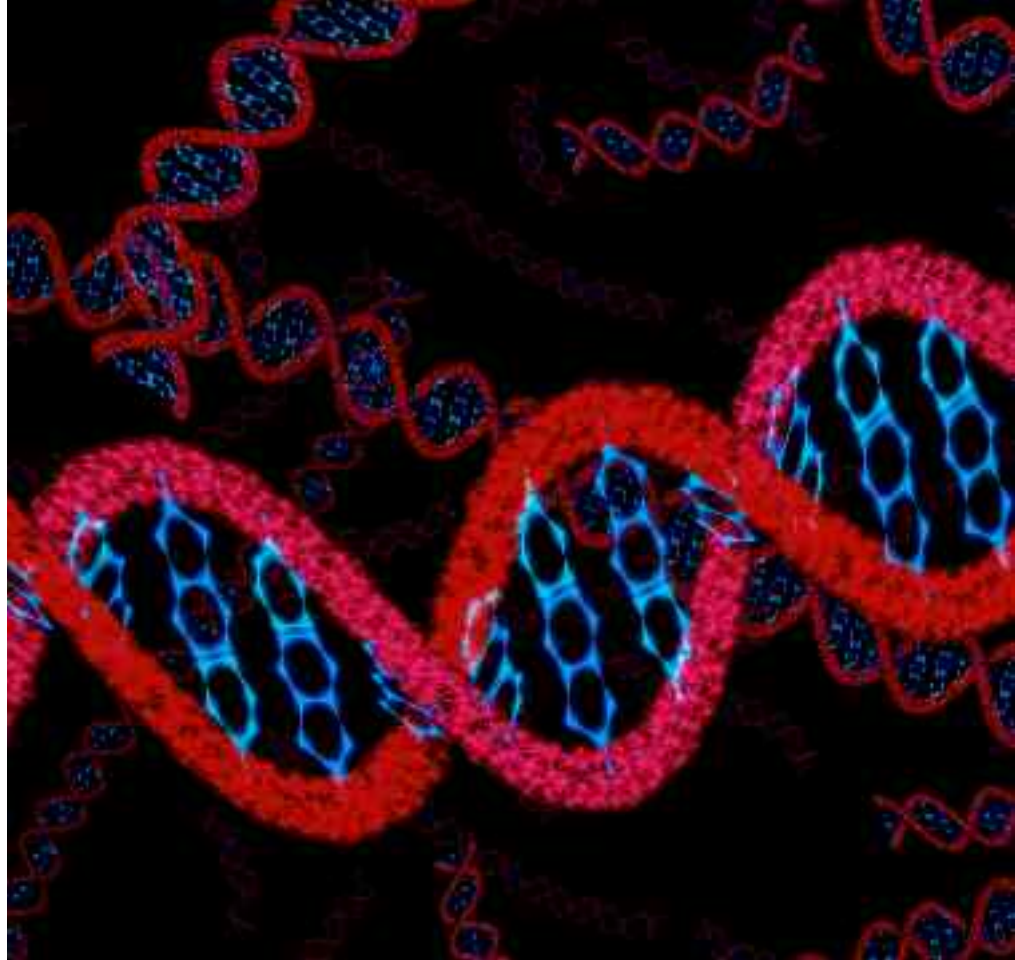
Charitable Contributions

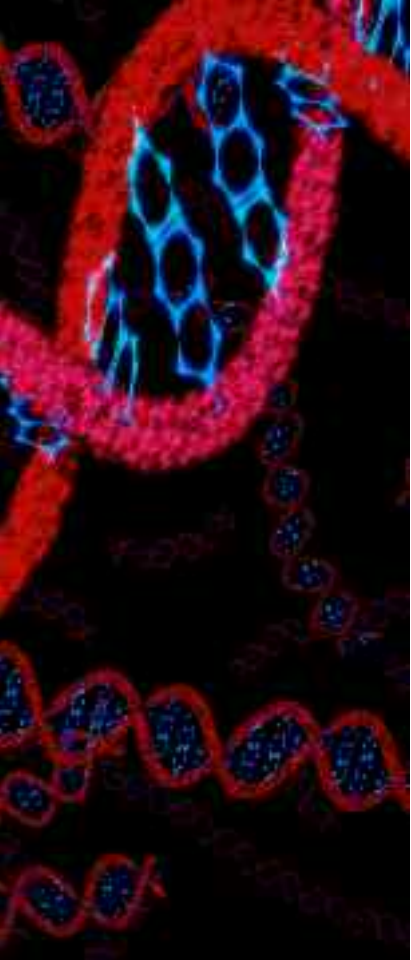
■ Pfizer provides charitable contributions in order to support public interest activities of recognized charities and third-party organizations. Requests for Pfizer funding are reviewed based on their merits. Such funding may not be used to influence or reward the recipient for present, past or future use or support of Pfizer medicines or to influence the outcome of clinical trials.



Research Grants

■ As a company focused on health, Pfizer supports a broad range of research endeavors. We provide research grants to support scientifically compelling investigations approved by Pfizer's Medical or Research and Development groups. Requests for Pfizer funding are reviewed based on their merits. Such funding may not be used to influence or reward the recipient for present, past or future use or support of Pfizer medicines or to influence the outcome of clinical trials.





Ethical Research

■ All sponsored and supported research must be ethical in its design and implementation. We require that our sponsored clinical research conform to well-accepted international standards, such as the Good Clinical Practice (GCP) guidelines of the International Conference of Harmonization, the Nuremberg Code, the Belmont Report and relevant national and local standards (e.g., the U.S. Pharmaceutical Research Manufacturers Association (PhRMA) Principles on the Conduct and

Communication of Clinical Trial Results). All clinical research protocols must be reviewed and approved by local Institutional Review Boards or Ethics Committees, except where exempted by law, and must comply with Pfizer's standards for clinical research and publications, as described in our policy on Global Clinical Trial Standards (posted at www.pfizer.com/are/about_public/mn_about_ethical_trials_standards.html).



Disclosure of Clinical Trial Information

All results of Pfizer-sponsored confirmatory clinical trials involving Pfizer marketed medicines will be disclosed in a publicly available database. In addition, as of July 1, 2005, Pfizer will disclose basic information about Pfizer-sponsored confirmatory clinical trials when each trial begins. This information will be available in a public clinical trials registry. Further information about Pfizer's commitment to the disclosure of clinical trial information is available in the Pfizer Policy on Public Disclosure of Clinical Trial Results (posted at -

http://www.pfizer.com/are/about_public/mn_about_ethical_trials_disclosure.html).

This *Global Policy on Interactions with Healthcare Professionals* reflects our commitment to operating responsibly, ethically and with integrity in our business endeavors; to focusing on improving patient care; and to ensuring our business activities support the best practice of medicine. By establishing and following this *Global Policy*, we strive to fulfill those responsibilities.

The effective date of this Global Policy is May 15, 2005



