

Pfizer 2026

**Methodology Note Supporting
the Disclosure Report for
Transfers of Value In 2025**

Pfizer Estonia

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1. Introduction - Pfizer's Commitment to Transparency Reporting

We regularly work with healthcare professionals (HCPs) and healthcare organisations (HCOs) who advise us on a range of topics such as medicines development, the role of a medicine in a patient treatment pathway, health economics and clinical best practice. These working relationships are essential to gaining the real-world information we need in order to deliver treatment choices that improve the health of patients and to share information that may be relevant to clinical decision making.

We are committed to transparency about how we operate as a business and about the relationships we have with HCPs and HCOs. Sharing information about these relationships in a straightforward and open way will, we hope, help explain the critical value these relationships bring to patient management.

We believe that transparency is essential to building and maintaining confidence in us and in our medicines and strongly support the work being done by The European Federation of Pharmaceutical Industries and Associations (EFPIA) to improve transparency across the pharmaceutical industry.

This methodological note presents how the transfers of value are categorized and in what format they are disclosed.

2. Definitions

2.1 Recipients:

HCP: means any member of the medical, dental, pharmacy or nursing professions or any other person who in the course of his/her professional activities may prescribe, purchase, supply, recommend or administer a medicinal product and whose place of business is in Europe. The term “healthcare professional” also covers: (i) any official or an employee of a government, government agency or other organisation (both in the public and the private sectors) who may prescribe, buy, supply, recommend or administer medicinal products; and (ii) any employee of a Member Company who mainly acts as a practising healthcare professional (excl. all other employees of the Member Company and wholesalers or resellers).

HCO: means any legal entity: (1) that is a healthcare or medical or scientific association or organisation such as hospital, clinic, university or a professional society whose headquarters or place of business is in Europe; or (2) through which one or more healthcare professionals provide services. Patient Organisations are not considered as Healthcare Organisations.

Covered Recipient: any reportable HCP or HCO

PO/PAG: means a non-profit organisation (incl. umbrella organisation) whose membership consists mainly of patients and/or their carers and that represents and/or supports the needs of patients and/or their carers and whose headquarters or primary place of business is in Europe.

Retired HCPs: ToVs of Retired HCPs are published

Deceased HCPs: ToVs of Deceased HCPs are published

2.2 Kind of ToVs:

ToV: Transfer of Value - Direct and indirect TOV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription only medicine exclusively for human use.

Direct ToVs are those made directly by a Member Company for the benefit of a Recipient.

Indirect ToVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value

TOV: Transfer of Value - paid to healthcare professionals and healthcare organisations or to third parties in their benefit (service providers such as accommodation establishments) are:

- (a) registration fees for events (e.g. conferences);
 - (b) travel and accommodation expenses for events;
 - (c) service or consultancy fees;
 - (d) research and development related fees;
- and payments paid to healthcare organisations:
- (e) donations; and
 - (f) grants.

Transfer of Value Categories

The following table defines what transfers of value are reported in which EFPIA category and subcategory.

EFPIA category	EFPIA subcategory	Example Activities
Donations and Grants (HCOs only)	n/a	<ul style="list-style-type: none"> • Charitable contributions • Business donations • Educational grants (e.g. fellowships, courses provided by an HCO where Pfizer does not select the individual HCPs participating) • Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants
Contribution to Cost of Events	Sponsorship agreements (HCOs only)	<ul style="list-style-type: none"> • Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program • Funding an event in return for a display booth • Funding an event in exchange for advertising space • Other advertisement space (in paper, electronic or other format) • Satellite symposia at a congress • Any other activity qualified as “Corporate Sponsorship” according to Pfizer’s Anti-Corruption Policies • Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as “Corporate Sponsorship” according Pfizer’s Anti-Corruption Policies

		<ul style="list-style-type: none"> For contributions provided to Events through Professional Conference Organisers(PCOs): TOVs through PCOs are reported as follows: <ul style="list-style-type: none"> either in the name of benefitting HCO or in the name of Recipient PCO
	Registration fees	<ul style="list-style-type: none"> Registration fees paid for the HCP/HCO to attend events
	Travel & Accommodation	<ul style="list-style-type: none"> Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation) Accommodation Travel Visa
Fee for services and consultancy	Fees	<ul style="list-style-type: none"> Speaker engagements Advisory Boards* Study-related engagements Preceptorships Post-marketing surveillance studies Non-Interventional Studies that are retrospective in nature Medical writing Data analysis Development of education materials General consulting / advising Speaker training if linked to a speaker engagement Any other activity which qualifies as General Consultancy according to Pfizer's Anti-Corruption Policies Collaborative Agreements
	Related expenses	<ul style="list-style-type: none"> Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) Accommodation Travel Visa
Research and Development Transfers of Value	n/a	<ul style="list-style-type: none"> Clinical Trials Data Monitoring Committees related to studies Non-Interventional Studies that are prospective in nature Investigators Initiated Research (IIR) Investigator Sponsored Research (ISR)

		<ul style="list-style-type: none">• Clinical & Research Collaboration
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*excluding Data Monitoring Committees related to studies which are disclosed in aggregate under R&D

3. Disclosure's Scope

3.1 Products concerned: This report includes ToVs related to Prescription Only Medicines.

3.2 Company concerned: This report includes ToVs processed by Pfizer Estonia legal entities and includes ToVs from all Pfizer legal entities.

3.3 Excluded ToVs: no reportable ToVs as defined by the Code have been excluded.

3.4 ToVs Date: This report includes ToVs related to the reporting period for 2025.

3.5 Direct ToVs: the clearing date is the reportable date

3.6 Indirect ToVs: the clearing date is the reportable date

3.7 Non-monetary ToVs: meeting or event: end date is the reportable date; benefit in kind donation: contract signature date is the reportable date

3.8 ToVs in case of partial attendances or cancellation and refund:

- Cancellation Fees are not reported
- No-shows are not reported if Pfizer is unable to confirm the in-kind benefit was received

3.9 Cross-border activities: The disclosure report includes TOV to HCPs and HCOs who practice in the disclosure report country. This includes all TOV (direct and indirect) made by any Pfizer affiliates.

3.10 R&D: see section 2.2, Transfer of Value Categories

3.11 Voluntary disclosure: n/a

4. Specific considerations

4.1 Country unique identifier: n/a

4.2 Self-incorporated HCP: are considered HCOs unless the organisation consists of only one HCP, then it would be considered an HCP.

4.3 Multi-year agreements: Where contracts are valid for more than one year, each individual TOV is captured and disclosed in the actual payment amount of the reporting year.

4.4 Country specificities:

- **Working with other pharmaceutical companies:** each company is accountable for reporting the ToVs that they manage.
- **Links to Collaborative Working executive summaries** are included in the disclosure report

4.5 Quality checks:

n/a

5. Data protection legal basis

Consent collection: Pfizer discloses the TOVs on an individual basis in Estonia.

Consent of the HCPs is required for disclosure of TOV under the recipient's name, if the covered recipient has not provided consent, the TOV is disclosed in the aggregate section of the report. This means that the transfer of value is not disclosed under the name of the HCP (or HCO for those markets where HCO consent applies), but as part of the sum of all the TOV.

In all cases, the EEA Pfizer HCP Privacy Notice is provided to the individuals and is available in those websites under our control where the TOV are disclosed. We make our best effort to advocate for transparency and explain its societal benefits.

As long as the legal basis is still valid (i.e., depending on the country, there have been no changes in the legal duty scope, no consent has been revoked or the individual has not objected to Pfizer's legitimate interest), the sum of all TOV to that HCP or HCO during the reporting period is disclosed under their name.

6. Form of disclosure

6.1 Date of publication: until 1 June 2026

6.2 Disclosure platform: [Pfizer Estonia](#)

6.3 Disclosure language: Estonian and English

7. Disclosure financial data

7.1 Currency: EURO. ToV's made in other currencies are converted to EURO prior to publication. The Pfizer standard exchange rates for the ToV on the day of payment are applied.

7.2 Value Added Tax (VAT): Treatment of VAT depends on the TOV:

- Where possible In kind related TOV's will be reported **including tax**
- Where possible Direct payment TOV's will be reported **excluding tax**

7.3 Calculation rules: Valuation of in-kind donations: the transaction amount is considered as the purchase price for good/product/service donations.

8. Additional information

n/a