

Pfizer 2026

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

Pfizer Lithuania

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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: any natural person that is a 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 primary practice, principal professional address or place of incorporation is in Lithuania. For the purpose of this Code, the definition of Healthcare Professionals includes: (i) any official or employee of a government, agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and (ii) any employee of a Company whose primary occupation is that of a practising Healthcare Professional, but excludes (x) all other employees of a Company and (y) a wholesaler or distributor of Medicinal Products..

HCO: any legal person/entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organisations within the scope of Article 21) whose business address, place of incorporation or primary place of operation is in Lithuania or (ii) through which one or more healthcare professionals provide services.

Covered Recipient: any healthcare professional or healthcare organisation or patient organisation as applicable, in each case, whose primary practice, principal professional address or place of incorporation is in Lithuania.

PO/PAG: non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and the business address, place of incorporation or primary place of operation of which is in Lithuania.

Retired HCPs: ToVs of Retired HCPs are published

Deceased HCPs: ToVs of Deceased HCPs are published

2.2 Kind of ToVs:

ToV: 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 medicines and non-prescription medicinal products for human use.

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

Indirect ToVs Indirect ToVs are those made on behalf of a Company for the benefit of a Recipient, or those made through a Third Party and where the 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	- 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)	- 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 to Pfizer’s Anti-Corruption Policies • For contributions provided to Events through Professional Conference Organisers (PCOs): TOVs through PCOs are reported as follows: - either in the name of benefitting HCO - or in the name of Recipient PCO
	Registration fees	• Registration fees paid for the HCP/HCO to attend events
	Travel & Accommodation	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation) • Accommodation • Travel Visa
Fee for services and consultancy	Fees	• 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	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Travel Visa

Research and Development Transfers of Value	n/a	• Clinical Trials • Data Monitoring Committees related to studies • Non-Interventional Studies that are prospective in nature • Investigators Initiated Research (IIR) • Investigator Sponsored Research (ISR) • 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 Lithuania 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:

- HCOs: Institution/Company Registration Number
- HCPs: STAMP Register ID

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.

4.5 Quality checks:

n/a

5. Data protection legal basis

Consent collection: Pfizer discloses ToVs on an individual basis in accordance with local law and the EFPIA Code.

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: 30 June 2026

6.2 Disclosure platform: [Pfizer Lithuania](#)

6.3 Disclosure language: Lithuanian 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 **including 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