

Pfizer Slovakia methodology used for the disclosure of transfer of values to healthcare professionals and healthcare organizations according to the AIFP Ethic Codex (in accordance with EFPIA Disclosure Code).

- All direct and indirect transfers of values received by a healthcare professional or a healthcare organization are subject to the disclosure.
 - Transfers of values that are subject to the disclosure pursuant to the Act No. 362/2011 on Medicinal Products and Medical Devices and were reported for 2019 at http://www.nczisk.sk/Statisticke_vystupy/Zverejnovanie_podla_zakona_lie_koch_zdravotnickych_pomockach/Sumarne_spravy_o_vydavkoch/Pages/default.aspx are not included in this report.
 - The submitted report only contains the transfers of values for 2019 (1 January 2019 – 31 December 2019) which, according to the differences in EFPIA definition and local legislation, were not disclosed; the date of payment for the cash payment and the date of execution for non-monetary benefit are decisive for inclusion in the period.
- Money transfers are disclosed as net payments without tax/gross payments including tax.
- Values of non-monetary transfers are disclosed in the form of a total amount, including VAT.
- **Definitions**
 - **“Healthcare professional (HCP)”** means 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 or 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 the Slovak Republic. For the avoidance of doubt, the definition of the healthcare professional also includes: any official or employee of a government agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products, and any employee whose primary occupation is that of a practising HCP, but excludes a wholesale distributor of medicinal products.
 - **“Healthcare Organization (HCO)”** means any legal person that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form), such as a hospital, clinic, foundation, university or other teaching

institution or learned society (e.g. Slovak Medical Association), whose business address, place of incorporation or primary place of operation is in the Slovak Republic or through which one or more HCPs provide services.

Particular categories of disclosed transfers

- **Transfer of values to **healthcare organizations****

- Donations and grants

Donations and grants to healthcare organizations, including donations and grants (funds or material benefits) to institutions, organizations or associations which consist of healthcare professionals and/or provide healthcare, in order to support the healthcare.

- Contribution to costs related to events

Contributions to costs related to a professional event carried out through a healthcare organization or third parties, including sponsorship of healthcare professionals in order to attend professional events:

- i. registration fees;
- ii. sponsorship agreements with healthcare professionals or third parties that healthcare organizations have entrusted with the organization of a professional event; and
- iii. travel and accommodation expenses;
- iv. also purchase of services during the event, such as rental of exhibition space, purchase of advertising space, advertising in the event materials are considered as a contribution to costs related to events.

- Fees for services and consultancy

Transfers of value arising from or in connection with contracts between the company and institutions, organizations or associations of healthcare professionals by virtue of which such institutions, organizations or associations provide the company with any type of service or any other type of funding not included in the previous categories. Remunerations and transfers of value related to the costs agreed in the written contract relating to the agreed activity will be disclosed as two separate amounts (payment for the service + reimbursed costs associated with the provision of the service).

- **Transfer of values to **healthcare professionals****

- Contribution to costs related to events

Contribution to costs related to a professional event:

- i. registration fees; and
- ii. travel and accommodation expenses.



➤ Fees for services and consultancy

Transfers of value arising from or in connection with contracts between the company and healthcare professionals by virtue of which healthcare professionals provide the company with any type of service or any other type of funding (including Non Interventional Studies that are Retrospective in nature) not included in the previous categories. Remunerations and transfers of value related to the costs agreed in the written contract relating to the agreed activity will be disclosed as two separate amounts (payment for the service + reimbursed costs associated with the provision of the service, if incurred, e.g. payment for professional training/lecture + payment for travelling to a training site).

Summarised disclosure

When particular information cannot be disclosed for legal reasons (e.g. missing consent to disclose personal data), the company discloses the transfer of value for the reporting period as the summarised amount attributable to such transfers of value. For each category, the summarised disclosure identifies the number of recipients listed in such disclosure, expressed in absolute values and percentage of all recipients, and the total amount per transfer of value to such recipients.

Transfers of value in the research and development

For given period, the company discloses transfers of R & D value as one amount in the summarised disclosure. Costs that are disclosed pursuant to the Act No. 362/2011 on Medicinal Products and Medical Devices are not a part of this report.

GDPR legal basis (to disclose ToV regarding individuals):

Depending on the jurisdiction, Pfizer discloses the ToV based either on (i) a legal duty; (ii) the consent of the HCPs (and HCOs who are individuals, as the case may be) to the disclosure of the ToV made to them; or (iii) the so-called legitimate interest GDPR ground, that is explained in the EEA Pfizer HCP Privacy Notice. 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. Our disclosures do not contain full governmental identifiers of the individuals at hand (unless imposed by local law) and technical measures have been adopted in the websites where the ToV are disclosed under our control to minimize to the

extent possible that the individual names may be easily found through search engines.

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.

If the status of the applicable legal basis changes, the report is updated as soon as possible. In particular, if none of the above legal basis applies, the ToV are 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, but as part of the sum of all the ToV which cannot rely on any of the above-mentioned legal basis (for example, if based on consent, regarding any HCP or HCO who did not provide consent -or later revoked it- to the disclosure of at least one transfer of value) during the reporting period.

