Upholding the Standards

Pfizer counts on you to uphold the Company's standards. The following describe how to act responsibly in any work situation:

• Know and live the standards. By knowing, understanding, and following applicable laws and Company policies, as well as the Pfizer Values, each of us can serve as a role model.

• Know the law and ask tough questions. You are expected to be familiar with the laws that apply to your specific job function and level of responsibility. If you are not sure whether a law or Company policy applies, or whether it exists at all, ask.

• Don't make assumptions. Do not assume that “senior management already knows” or “management doesn’t care about this.” Also, do not assume that no action will be taken. Pfizer management is dedicated to ensuring that the standards of legal and ethical behavior are upheld. In fact, responsible managers are obligated to respond to an employee's concerns. We want you to tell us if something is wrong.

• Don't ignore violations. We all need to take the law and Company policies seriously. If you think someone may be violating a law or policy, please take steps to address the situation.

• Help improve controls and processes. Some violations may not be easy to detect within our current controls and processes. If you have a suggestion for improvement, please do not hesitate to make it.

• Don't be pressured. You are never expected to violate a law or policy, nor should you ever feel encouraged or pressured to do so—even if the violation will improve the bottom line or help meet a performance goal. Always act with Integrity.

Performing with Integrity—Questions to Ask

Asking yourself these questions can help determine if a course of action is ethical:

• Are my actions legal?

• Am I being fair and honest?

• Am I acting in accordance with the standards set forth in this Blue Book? The Pfizer Values?

• Would failing to act make the situation worse or allow a “wrong” to continue?

• How would my actions look if they were reported on the front page of the newspaper?

• If I were testifying in court and asked to explain what I had done, how would I respond?

http://integrity.pfizer.com
Integrity is the foundation of the trust we need to work together for a healthier world.
The Pfizer Values

Community Customer Focus Innovation Integrity Leadership Performance Respect for People Teamwork Quality
The Summary of Pfizer Policies on Business Conduct (the “Blue Book”) is Pfizer’s guide to Company policies and legal requirements that govern how we conduct business around the world. This booklet is a general reference for all employees everywhere we do business. It does not describe all applicable laws or Company policies, or give full details on any individual law or policy. Pfizer reserves the right to modify, revise, or alter any policy, procedure, or condition related to employment at its sole discretion and at any time without notice and without revision of the Blue Book. The contents of the Blue Book do not constitute the terms of a contract of employment, and nothing contained herein should be construed as a guarantee of continued employment — employment at Pfizer is on an at-will basis. The Blue Book is not a legal document and is intended for informational use only. The information herein supersedes previous printed Blue Books, can be changed or revoked unilaterally by the Company at any time, and is not all-inclusive. The online version of the Blue Book, accessible through the Compliance website (http://integrity.pfizer.com), supersedes all printed versions, including this Blue Book. If any information in the Blue Book, whether in print or online, differs from established Pfizer policies or procedures, the legal policy and procedure documents govern.
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The Blue Book is also online...

[http://integrity.pfizer.com](http://integrity.pfizer.com)
What does it mean to perform with integrity?

Performing with integrity means setting the right priorities and delivering on our commitments while adhering to Pfizer’s Values and the standards set forth in this Blue Book. We can do this by:

- integrating integrity in all that we do;
- holding ourselves personally accountable to high, ethical standards; and
- demonstrating leadership by fostering an environment focused on performance with integrity and accountability.

At Pfizer, performance with integrity is not only what we do — it’s who we are.

Performance with Integrity — A Shared Responsibility

Pfizer counts on you to uphold the Company’s reputation and standards by always performing with integrity. To do so, keep in mind the following guiding principles:

- **Know and live the standards.** By knowing, understanding, and acting in accordance with Pfizer’s Values and the applicable laws and Company policies outlined herein, each of us can serve as a role model.

- **Know the law and ask tough questions.** You are expected to be familiar with the laws that apply to your specific job function and level of responsibility. If you have any questions, ask your supervisor, a member of the Legal Division, or the Corporate Compliance Group.

- **Don’t make assumptions.** Do not assume that “senior management already knows” or “management doesn’t care about this.” Also, do not assume that no action will be taken. Pfizer management is dedicated to ensuring that the standards of legal and ethical behavior are upheld. In fact, responsible managers are obligated to respond to an employee’s concerns. Tell us if something is wrong.

- **Don’t ignore violations.** We all need to take the law and Company policies seriously. If you think someone may be violating a law or policy, please take steps to address the situation by speaking with them directly or by notifying your supervisor, Human Resources or the Corporate Compliance Group.

- **Help improve controls and processes.** Some violations may not be easy to detect within our current controls and processes. If you have a suggestion for improvement, please do not hesitate to make it.

- **Always act with integrity.** You are never expected to violate a law or policy, nor should you ever feel encouraged or pressured to do so — even if the violation will improve the bottom line or help meet a performance goal.
Our Standards

As a Pfizer colleague, you share the privilege and responsibility of upholding the Company’s honorable reputation. You do this each time you act ethically and legally. While such conduct may be second nature, there are many situations where making the “right choice” can be challenging.

That is why we have this Summary of Pfizer Policies on Business Conduct (the “Blue Book”). It is a guide to the Company’s compliance structure, applicable laws, and key policies and procedures that govern doing business in a legal and ethical manner.

Performing with integrity and adhering to our compliance standards is a shared responsibility between the Company and employees. The Company is responsible for defining how Pfizer will comply with applicable laws and regulations (through systems, policies, and procedures); monitoring our efforts; and correcting any non-compliance. You are responsible for understanding and following the standards described in this Blue Book, and for seeking guidance when you need it.

Pfizer also holds its vendors and contractors to high standards. Vendors and contractors are expected to comply with all policies that relate to work conducted on Pfizer’s behalf.

The standards described in this Blue Book apply in all countries where we conduct business. All employees are subject to the laws and regulations of the country where they work. In addition, since Pfizer Inc, our parent company, is a U.S. company, U.S. law may apply to conduct that occurs outside the U.S. — for example, in the case of anti-corruption and bribery laws. Be sure to consult your supervisor or a member of the Legal Division or the Corporate Compliance Group if you are unclear about which laws and regulations apply to your activities.

Q. Where can I find Pfizer’s corporate policies and procedures?

A. The full text of all our corporate policies and procedures is available on PolicySource, http://policysource.pfizer.com. You are expected to understand how these policies and procedures apply to you and to follow them. We encourage you to discuss any questions or concerns with your supervisor or to request advice from the Legal Division or the Corporate Compliance Group.
Pfizer’s Compliance Program

Pfizer has a well-structured corporate compliance program designed to support legal and ethical actions throughout the Company. It is principally comprised of the Chief Compliance Officer, the Corporate Compliance Committee, the Corporate Compliance Group, and local Compliance Liaisons. It is also supported by an informal network of local managers, corporate functions, and specialized audit groups.

The following description of Pfizer’s corporate compliance system can help you identify who to ask for help when you want or need additional guidance that your supervisor may be unable to provide.

Chief Compliance Officer

The Chief Compliance Officer is responsible for overseeing Pfizer’s corporate compliance program, including the monitoring and self-evaluation programs relating to the legal and regulatory obligations of the Company. The Chief Compliance Officer ensures that there is broad application and consistent interpretation of our standards throughout the Company. The Chief Compliance Officer chairs the Corporate Compliance Committee and reports to the Chief Executive Officer.

Corporate Compliance Committee

Representatives from each business division make up the Corporate Compliance Committee. Members provide oversight to Pfizer’s corporate compliance strategy and program and are charged with keeping the Chief Compliance Officer, the Board of Directors, and senior management informed of significant compliance issues, risks, and trends. Many groups within Pfizer support the work of the Committee, including the Corporate Compliance Group. Additionally, corporate oversight and audit groups provide further resources and information to the Committee.
**Corporate Compliance Group**

The Corporate Compliance Group works with the Chief Compliance Officer to ensure adherence to laws, regulations, and Company policies and procedures on a day-to-day basis.

The Corporate Compliance Group has exclusive responsibility, on behalf of the Chief Compliance Officer, for investigating “Referable Compliance Issues” — significant potential, suspected, or actual violations of law or policy that pose a risk to the Company, employees, or the public (including the threat of material financial, investor, public relations, environment, health, or safety risks). The Corporate Compliance Group may seek help in investigating these matters from other individuals and groups. No investigation may be commenced, however, without the express consent of the Corporate Compliance Group.

In addition to investigating matters and promoting compliance with our standards of conduct, the Corporate Compliance Group engages in a number of proactive efforts to strengthen Pfizer’s culture of performance with integrity, including the execution of risk assessments, deployment of targeted training, and the delivery of ongoing communications and compliance education initiatives. The Corporate Compliance Group also publishes this Blue Book, maintains the Compliance website, manages the Compliance Hotline, and is generally available as a resource on compliance matters.

**Key Term**

**Referable Compliance Issues** (RCIs) are significant potential, suspected, or actual violations of applicable law or Company policy that must be reported to the Corporate Compliance Group for investigation. Whether a matter is significant depends on the particular facts of the situation. Some considerations are:

- Was the action intentional or part of a pattern?
- Was the action criminal?
- Was a manager involved?
- Did the action expose employees or the public to dangerous health or safety risks?
- What are the potential consequences?

If you are unsure whether a matter is an RCI, ask the Corporate Compliance Group.
Compliance Liaisons
Pfizer’s compliance program is further strengthened by Compliance Liaisons in each market. Liaisons may be Company attorneys or members of local management who have special responsibilities for facilitating communications between employees and corporate officers when there are questions of how to apply, promote, and enforce our standards for legal and ethical behavior.

Other Compliance Resources
Subject matter expertise and compliance support are provided by a number of groups and individuals throughout the Company in areas such as legal, safety and monitoring, auditing, security, human resources, finance, corporate governance, policy and other functions. There may also be divisional or local compliance functions available to assist you. Please consult the relevant compliance support group or contact the Corporate Compliance Group for assistance.

Your central resource for compliance information and contacts is the Compliance website, http://integrity.pfizer.com. The website contains helpful information and other resources about the laws, policies, and procedures summarized in this Blue Book. On this website, you also can find names and contact information for:
- the Chief Compliance Officer;
- the Corporate Compliance Committee;
- the Corporate Compliance Group; and
- local Compliance Liaisons.
Our Responsibilities as Pfizer Colleagues

All Pfizer colleagues are responsible for upholding the highest standards when acting on Pfizer’s behalf. Integrity is at the core of our Company’s identity. We are therefore expected to perform with integrity every day. Pfizer views all employees as critical to maintaining an effective compliance program. In addition to your personal responsibility for following the standards described in this Blue Book, you are responsible for raising concerns about risks to the Company — ideally, before these risks become actual problems.

If you reasonably believe that another employee has violated or may violate a U.S. law, law of a foreign country, or specific Pfizer policy or procedure, you have a duty to report that information immediately to your supervisor or to the Chief Compliance Officer through the Corporate Compliance Group. Pfizer has Open Door, anti-retaliation, and confidentiality policies to encourage and protect colleagues who raise valid concerns. Whenever you are in doubt, it is best to raise your concern.

Non-compliance can pose serious risks for Pfizer, customers, patients, investors, and employees. By raising concerns, you allow management the opportunity to address potential problems and protect the Company. The following chart shows some of the possible consequences of non-compliance.

<table>
<thead>
<tr>
<th>Consequences for Pfizer May Include</th>
<th>Consequences for an Employee May Include</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Prosecution, fines, and other penalties for the improper conduct of its employees</td>
<td>• Prosecution, fines, imprisonment, and other penalties for improper conduct</td>
</tr>
<tr>
<td>• Disclosure to government agencies</td>
<td>• Disciplinary action up to and including termination</td>
</tr>
<tr>
<td>• Loss of business</td>
<td>• Damage to personal reputation</td>
</tr>
<tr>
<td>• Damage to Pfizer’s:</td>
<td>• Serious injury or illness to employees</td>
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<tr>
<td>― good name</td>
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<tr>
<td>― trade and customer relations</td>
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<td>― business opportunities</td>
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</table>

<table>
<thead>
<tr>
<th>Consequences for Patients and the Public May Include</th>
<th>Consequences for Investors May Include</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Compromised product safety</td>
<td>• Loss of confidence in Pfizer</td>
</tr>
<tr>
<td>• Environmental risk</td>
<td>• Loss of investment value</td>
</tr>
<tr>
<td>• Higher cost of life-saving medicines</td>
<td>• Damage to Pfizer’s reputation for good corporate governance</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Consequences for Customers May Include</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Loss of good faith in their dealings with Pfizer</td>
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Open Door Policy

The foundation of our compliance effort is openness, accessibility, and discussion within the Pfizer community. Most issues can be resolved locally before they become problems for employees, the Company, or the public. The Open Door Policy encourages employees to present ideas, raise concerns, and ask questions — especially those of a legal or ethical nature, but also those relating to quality of work. All managers are responsible for supporting this policy by maintaining an “open door” for their direct reports and other employees who may reach out to them.

While we hope that employees feel comfortable discussing any matter with their supervisors, there may be times when a supervisor cannot help. In these cases, you should speak with others, including:
- the next higher level of supervision;
- your operating unit head;
- your local Human Resources representative; or
- the Corporate Human Resources Group.

You may also reach out to the Open Door Solutions Group in Worldwide Human Resources, the Corporate Compliance Group, or any staff-level manager.

Q. What if I fear retaliation?

A. Retaliation against any employee who seeks advice, raises a concern, or reports misconduct is strictly prohibited. If an individual retaliates against an employee who has truthfully and in good faith reported a potential violation, Pfizer will take appropriate action — even if it later turns out that the employee was mistaken in reporting the matter originally. However, if an individual has intentionally made a false report, the company will respond accordingly. If you suspect that you, or another employee, have been retaliated against for raising a good faith concern, you should contact the Corporate Compliance Group immediately or call the Compliance Hotline where available and permitted by law.
Confidentiality

It is essential that you feel secure when participating in the Company’s compliance program. Therefore, confidentiality is a priority and every effort will be made to protect your identity whenever you interact with any element of the compliance program. In some instances, however, it may be impossible to keep your identity confidential because of the demands of conducting a thorough investigation or certain legal requirements. Where available and permitted by law, colleagues concerned about confidentiality may consider placing an anonymous call to the Pfizer Compliance Hotline.

Compliance Hotline

While compliance matters may often be resolved at the local level, the Compliance Hotline can provide access to corporate resources to address matters that might not be adequately resolved locally. It can also provide a way to report a concern or get information or advice anonymously.

Local privacy laws may affect the Compliance Hotline’s availability and terms of use. For example, in some countries, the Compliance Hotline can only be used to report serious concerns involving senior management. In other countries, the Compliance Hotline cannot be used to communicate anonymous allegations.

In most countries however, the Compliance Hotline is available 24 hours a day, 7 days a week, 365 days a year, and is operated by specially trained third-party representatives. Where permitted by law, calls to the Compliance Hotline will not be traced or recorded, and callers may choose to remain anonymous if they wish. Compliance Hotline representatives will listen to concerns, ask questions, and review the information provided. They will then forward matters to Pfizer’s Corporate Compliance Group, which will take appropriate action. Callers can also arrange to receive information about the Company’s response to the call.

To find out more or to contact the Compliance Hotline, visit the Compliance website at http://integrity.pfizer.com or refer to the Important Contact Information page at the beginning of this Blue Book. Local Compliance Hotline reference brochures, which provide further guidance on when and how the Compliance Hotline can be used in your country, may also be available in select countries.

Q. If I report a concern to the Corporate Compliance Group, can I expect a response?

A. Yes. The Corporate Compliance Group’s goal is to respond promptly to all questions and reported concerns. If your concern requires an investigation, the Corporate Compliance Group will do so in a timely manner. Whenever possible, you will be informed about the status of the investigation and the outcome of a matter. However, the Corporate Compliance Group has confidentiality obligations to all employees — those being investigated as well as those making reports. Detailed information about any matter will only be shared with those who “need to know.”
Our Commitment

Pfizer will compete lawfully and ethically in the marketplace. We will act responsibly in our relationships with healthcare professionals, patients, hospitals, academics, governments, regulatory entities, partners, customers, suppliers, and vendors. We will provide innovative products to our customers, and we will be honest and fair in all our business dealings.

To keep this promise to our customers and the marketplace, we will:

• comply with all healthcare laws and respect our regulatory requirements;
• market products and interact with healthcare professionals honestly in accordance with laws and regulations;
• monitor the safety, performance, and quality of our products;
• inform healthcare professionals and the public of product experience and safety information for our products;
• ensure patient privacy by keeping medical information confidential;
• interact ethically and in good faith with government officials and business partners;
• follow all antitrust and competition laws;
• gather business intelligence properly; and
• follow customs and anti-boycott laws.

We will not:

• make illegal payments to government officials or business partners; or
• offer or accept inappropriate gifts or entertainment.

A Commitment to Teamwork

We know that to be a successful company, we must work together, frequently transcending organizational and geographic boundaries to meet the changing needs of our customers.

A Commitment to Customer Focus

We are deeply committed to meeting the needs of our customers, and we constantly focus on customer satisfaction.
Healthcare Laws and Regulatory Requirements

As a pharmaceutical company, Pfizer is part of a unique industry. The purchaser of our products is often not the one recommending, prescribing, or using them. The purchaser (or reimburer of medicines) may be the government or a healthcare insurance company, while the decision-maker may be a doctor, healthcare institution or organization, or pharmacist. As a result, the pharmaceutical industry is subject to a host of rules and regulations.

Healthcare laws and regulations seek to:

• reduce fraud and abuse in government and other regulated healthcare programs;
• help manage public and private systems for the reimbursement of healthcare expenses;
• eliminate the improper influence of financial and other incentives on medical judgment;
• ensure the ethical promotion and communication of product information to patients, healthcare professionals, and healthcare organizations;
• reduce the cost of healthcare; and
• protect patients and improve the quality of healthcare services.

As Pfizer is a global company, the laws and regulatory requirements of one country may apply to activities in another country. For example, many requirements of the U.S. Food and Drug Administration (FDA) must be followed by Pfizer operations outside the U.S. In the event local laws and regulatory requirements differ from those of the U.S., the stricter set of laws and regulatory requirements should be followed.

Pfizer follows all applicable laws and regulatory requirements governing the development, manufacturing, distribution, and promotion of drugs and biological products, and is fully committed to healthcare law and regulatory compliance globally. Colleagues must be familiar with all relevant laws and regulatory requirements that pertain to their job responsibilities.

By following Pfizer policies, you will ensure your compliance with all laws and regulations relating to the conduct of business in the pharmaceutical industry.
Beyond adhering to pharmaceutical industry regulations and standards, Pfizer is committed to fair competition as a matter of corporate conduct. We abide by all laws that apply to our marketing activities. Under these laws, it is illegal to use unfair methods of competition or unfair or deceptive acts or practices in commerce. Examples include, but are not limited to:

- false or misleading advertising, or any other form of misrepresentation made in connection with sales;
- bribery of competitors’ or customers’ employees; and
- unfair comments about competitors’ products.

Regulation of advertising and product promotion directly affects our customer relationships. All colleagues should understand the basic rules Pfizer follows to ensure compliance with the laws and regulations regarding promotional activities and interactions with healthcare professionals.

Pfizer’s policy is that all promotional materials and communications must be:

- accurate and not misleading;
- balanced, substantiated, and scientifically rigorous; and
- compliant with local medical, legal, and regulatory standards.

Strict regulations govern our relationships with healthcare professionals, including our interactions with physicians, nurses, pharmacists, and others who administer, prescribe, purchase, or recommend prescription medicines. These interactions are not limited to promotional activities; our educational and commercial relationships with healthcare professionals are also strictly regulated. All interactions with healthcare professionals should be guided by:

- Pfizer’s Global Policy on Interactions with Healthcare Professionals (“GPIHP”);
- applicable national and regional industry association codes; and
- applicable laws, regulations, and other industry standards.

Colleagues in sales, marketing, medical, and regulatory functions must also be familiar with Pfizer policies and procedures on labeling, promotional programs, product samples, and other relevant policies and procedures.
Monitoring the Safety, Performance, and Quality of Our Products

At Pfizer, patient safety is our number one priority. Therefore, we must work diligently to understand the safety and tolerability of our products so that we can provide high-quality information regarding their relative risks and benefits to medical professionals, patients, and regulatory authorities around the world.

Understanding a product’s safety profile, as well as its quality and performance characteristics, is essential. These components are extensively monitored during clinical studies. However, it is only after a product has been marketed and used in real-world conditions that its safety profile and performance characteristics become more completely known.

The more information we have on our products the better. That’s why every Pfizer employee must share in the responsibility of reporting any safety, quality, or performance issues concerning a marketed Pfizer product. In fact, we have a legal obligation to track and report adverse drug experiences and product quality complaints to regulatory authorities.

We may learn of product issues in many different ways — in telephone calls, letters, faxes, e-mails, websites, completed response forms from Pfizer-sponsored marketing programs, or in meetings or casual conversations at work or even in social settings. Any information about a product issue must be forwarded within 24 hours of awareness. Pfizer’s U.S. colleagues or contractors may call 1-800-438-1985 to forward any product issues. All other Pfizer colleagues or contractors should contact their local safety group or ask their supervisor for the appropriate forwarding information.

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Q. At a dinner party, a neighbor said that his wife, who uses a Pfizer product to treat her diabetic foot infection, had stayed home because of a sore throat. Do I need to inform the company?

A. Yes, you must forward a report. Regardless of how you learned of the event, the severity of the event, or whether you think the event was a side effect of the Pfizer product, it is your ethical and legal responsibility to forward the information to the appropriate safety group within 24 hours of awareness.
Product Experience Disclosure

Pfizer’s robust medical governance process ensures vigilant maintenance of the benefit and risk profile of its products. It also ensures timely communication of all new product information to patients, healthcare professionals, and regulators. Worldwide, these stakeholders are fully informed of the uses, safety, contraindications, and side effects of our products and, where appropriate, their operational requirements and characteristics. We provide this information using:

- package inserts;
- mailings to physicians and other healthcare professionals;
- educational and/or promotional materials;
- presentations by our service representatives;
- disclosure of clinical trial results; and
- disclosure of regulatory post-marketing commitments and their status.

The information provided must be consistent with the worldwide body of scientific knowledge pertaining to the relevant products. It must also comply with local requirements of good medical practice and government regulation.

Patient Privacy

Certain research and business activities may involve the review of patient medical records or the collection of personal medical information. Patient information must be kept strictly confidential, and must only be used or disclosed in accordance with applicable laws and regulations or with the patient’s consent. All employees, contractors and companies working with Pfizer must protect and ensure the privacy and security of the health information entrusted to us by patients, consumers, and others.
Bribery and Corruption

Pfizer has a longstanding corporate policy that prohibits colleagues or anyone acting on our behalf from providing any payment or benefit to any person or entity in order to improperly influence a government official or to gain an unfair business advantage.

Most countries in which we do business have laws that forbid making, offering, or promising any payment or anything of value (directly or indirectly) to a government official when the payment is intended to influence an official act or decision to award or retain business. In the United States, the U.S. Foreign Corrupt Practices Act (FCPA) regulates U.S. companies doing business abroad. The FCPA makes it illegal for employees of U.S. companies to directly or indirectly give anything of value to a non-U.S. government official, political party, or party official in order to gain an improper business advantage. In addition, its accounting provisions make it illegal to improperly record transactions. As a U.S. company, Pfizer Inc and all of its U.S. and non-U.S. subsidiaries and colleagues must comply with the FCPA. We must also comply with all local anti-bribery and corruption laws.

In our business, we must be particularly sensitive to bribery and corruption issues because governments are often both the regulator of our products and a major customer. We also use the services of healthcare professionals and scientists, many of whom are employees of public institutions and may be considered government officials. For this reason, no colleague should ever make a payment or provide a benefit that is intended to improperly influence, or even appears to improperly influence, a government official’s actions.

Pfizer also prohibits “commercial bribery,” which is illegal in many countries. Commercial bribery is giving something of value to an intermediary (e.g., an employee of a customer) without his or her supervisor’s knowledge, with the intent to influence the supervisor’s commercial conduct. Pfizer prohibits any employee, consultant, middleman, or other agent from directly or indirectly engaging in commercial bribery.

Q. I travel around the world for Pfizer and know there are wide-ranging interpretations of “normal business practices.” What is considered a customary courtesy in one country may be viewed as a bribe in another. What does that mean for me?

A. You must not provide any payment or benefit of any kind to a government official, healthcare professional, or any other person to gain an improper business advantage for Pfizer. You are always expected to comply with the Summary of Pfizer Policies on Business Conduct, Pfizer’s International Anti-Bribery and Anti-Corruption Policy and Procedure, the Global Policy on Interactions with Healthcare Professionals, and all other relevant policies, procedures, and laws. If you need advice, contact the Legal Division or the Corporate Compliance Group.

The Anti-kickback Law

In the United States, the Anti-kickback Law prohibits the offering of anything to a person that is intended to influence that person to recommend or purchase a healthcare product (including prescription medication) or service that may be reimbursed by Medicare or Medicaid. This is to ensure that a healthcare provider’s treatment recommendation is not influenced by motives of personal gain or enrichment. For more information, please visit the Compliance website at http://integrity.pfizer.com.
Trade Associations

Trade association meetings and other industry gatherings serve legitimate and worthwhile purposes. However, these meetings pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition law obligations. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported. If the conversation turns to any kind of anti-competitive discussion, you should refuse to discuss the matter and leave the conversation immediately.

Antitrust and Competition Laws

Antitrust and competition laws protect free enterprise. While these laws are complex and difficult to summarize, at a minimum, they prohibit agreements between Pfizer and our competitors that affect prices, terms or conditions of sale, or fair competition.

In order to avoid improper agreements, Pfizer prohibits:

- discussions/contacts with competitors regarding pricing, costs, or terms or conditions of sale;
- discussions/contacts with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace;
- agreements with competitors regarding allocating markets or customers; and
- agreements with others to boycott customers or suppliers.

If you are responsible for areas of the business where these laws apply, you must be aware of them and their implications, including how they apply in the country where you operate. Many countries have antitrust or competition laws (though they vary significantly from country to country). For example, certain countries’ competition laws may be more stringent than those of the U.S. and regulate, among other things, distribution agreements; rebates and discounts to customers; patent, copyright, and trademark licenses; territorial restrictions on resellers; and pricing policy generally.

These laws are complex. You are expected to ask for advice from the Legal Division before you act.

Q. My neighbor works for one of our competitors. Is it okay to discuss how her company deals with managed care companies?

A. No. Subjects that should not be discussed at a normal business meeting — because they would violate applicable law — should not be discussed in a social setting for the same reasons.
Business Intelligence

In today’s business environment, we have access to a great amount of public information about other companies, and their products and services. It is generally acceptable to have and make use of public information in conducting our business.

You are free to gather intelligence about companies from public sources such as their websites, published articles, price bulletins, advertisements, brochures, public presentations, and customer conversations. You may also contract with an outside vendor to gather business information, but only through the selection and contracting process approved by the Legal Division and our Business Intelligence function.

Business information about other companies should only be collected and used ethically and in a way that does not violate any laws or confidentiality obligations. You must never use, or ask any third party to use, unlawful or unethical means such as misrepresentation, deception, theft, spying, or bribery to gather information. If a third party vendor is used to gather business intelligence, it is your responsibility to do everything possible to make sure the vendor collects information legally and ethically and is aware of Pfizer’s policies. If you need assistance in this area, contact the Legal Division or the Corporate Compliance Group.

Trade Issues

The United States and other countries where Pfizer does business have laws that restrict or prohibit doing business with certain countries and parties. Likewise, many countries also restrict or prohibit transactions involving certain products and technologies. The U.S. has laws that regulate how companies must respond to boycotts enforced by one set of countries against another. Colleagues responsible for Pfizer’s international operations must be aware of these laws and how they apply. Any questions or concerns should be directed to the Legal Division or the Corporate Compliance Group.

Q. My manager wants me to find out what patient recruitment exclusion criteria a competitor is using in an important clinical trial. That information is not publicly available. Can I pose as a potential patient recruit, call the competitor’s clinical research site, and simply ask some questions?

A. No. Misrepresentation — not disclosing that you are a Pfizer employee or posing as something you are not — is an unethical way to gain access to a competitor’s confidential information. It violates Pfizer policies, as well as the Integrity value. Before you engage in any business intelligence primary field research, you must consult with the Legal Division to confirm that your strategy is legal and ethical.
Our Commitment

Pfizer is committed to pursuing sound growth and earnings goals while maintaining integrity in all that we do. We will operate in the best interests of the Company and our shareholders, be forthright about our operations and performance, and exercise care in the use of our assets and resources.

To protect the best interests of the Company and our shareholders, we will:

• keep accurate and complete books and records;
• maintain an effective system of internal controls over financial reporting;
• retain Company records to comply with our obligations;
• make appropriate use of company resources and keep our computers and networks secure;
• safeguard confidential, proprietary, and personal information;
• protect patents and trademarks;
• never trade on or disclose confidential or inside information; and
• avoid conflicts of interest.
Books and Recordkeeping

Accurate business records are essential to the management of the Company and to maintaining and safeguarding investor confidence. They also help Pfizer fulfill its obligation to provide full, accurate, and timely financial and other disclosures to the public and governments around the world. All of Pfizer’s books, records, and accounts must fully and accurately reflect the Company’s business transactions. These include time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records, performance evaluations, and other essential Company data.

Reporting Accounting Fraud

It is your responsibility to report any unrecorded funds or assets or false or artificial entries in the books and records of the Company if you become aware of them. If you learn of or suspect accounting fraud, report it immediately by contacting the Corporate Compliance Group or Corporate Internal Audit.
Records and Information Management

Pfizer has records and information management policies and procedures to ensure that Company records are maintained, stored and, when appropriate, destroyed in accordance with Pfizer’s needs and in compliance with applicable legal, regulatory, environmental, tax, employment, and trade requirements. Pfizer’s detailed Enterprise Records Retention Schedule provides specifics on appropriate retention durations. You are expected to be familiar with the Enterprise Records Retention Schedule, the specific requirements of your business and location, as well as all applicable corporate policies and procedures.

Records may also be demanded by third parties, including governmental regulatory agencies, in lawsuits or other inquiries beyond the normal retention period. It is our policy to preserve any records relevant to any litigation or government investigation involving Pfizer. If you receive a “Legal or Tax Audit Hold,” or reasonably believe that an investigation is under way, you must cease from altering or discarding any relevant information. To understand which records must be preserved, please refer to Pfizer’s Legal Holds list or contact the Legal Division for more guidance.

Pfizer’s Enterprise Records Retention Schedule, information about Legal Holds, and additional records management resources can be found at http://eRIM.pfizer.com. If you need additional assistance, contact the eRIM group at recordsmanagement@pfizer.com.

Key Term

**Business records** are any recorded information captured in any physical or electronic medium that is created or maintained as part of conducting business for Pfizer. Examples include paper documents (including hand-written notes), audio or video tapes, and computer-based information such as e-mail, computer files and any other medium that contains information about a Company organization or its business activities.
Acceptable Use of Company Computers and Resources

Pfizer supports a wide range of electronic devices and networks to help people work as effectively as possible. Mobile phones, personal digital assistants (PDAs), Internet access, e-mail and other systems can significantly enhance our productivity. When used inappropriately however, they may expose Pfizer data and systems to substantial risk.

To ensure the security and integrity of Pfizer’s technology and information systems:

• Only approved mechanisms, tools, and procedures should be used to access the Pfizer network.
• Passwords should never be revealed and should be changed immediately if compromised.
• Unauthorized software should not be installed on your computer system.
• Pfizer systems should never be used to display, procure, or transmit inappropriate material.
• Pfizer business information should only be shared with authorized parties using Pfizer e-mail or company-approved technologies.
• Managers and contractor sponsors must ensure their direct reports, and contractors are off-boarded within 24 hours of termination.

Although you may use Pfizer electronic equipment for incidental personal matters, except where mandated by law, you are not guaranteed personal privacy for information sent to, from, or stored in Company communication systems. Also, since all documents, including electronic communications, are the Company’s property, they are subject to review at any time.

Appropriate Use of Pfizer Computers and Communication Resources

You may not use Pfizer computer resources or communication systems for communications that contain or promote any of the following:

• abusive or objectionable language;
• information that is illegal or obscene;
• messages that are likely to result in the loss or damage of the recipient’s work or systems;
• messages that are defamatory;
• use that interferes with the work of the employee or others; or
• solicitation of employees for any unauthorized purpose.

Q. An employee e-mails a weekly collection of jokes to others and me. Some of them are pretty offensive. Could he get into trouble for this?

A. Yes. He could face disciplinary action because he is violating two of Pfizer’s policies: to maintain an environment of respect and to use electronic equipment for Company business only. As a friend and colleague, you should advise him to stop.

Q. I sometimes ask my administrative coordinator to access my e-mail account with my network password to manage my calendar and file away e-mails — does this qualify as acceptable use?

A. No, you may not share your network password with anyone except in limited technical support situations where you then change your password immediately thereafter. Outlook offers a range of delegation rights so that administrative personnel can manage their supervisor’s e-mail efficiently.
Confidential and Proprietary Information

The products, services, ideas, concepts, and other information we produce on a daily basis are important proprietary assets for our Company. Various laws enable us to protect these assets. Examples of confidential or proprietary information include marketing plans and strategies, sales and marketing data, customer and employee records, research and technical data, manufacturing techniques, pricing information and, information pertaining to business development opportunities and new products and services.

It is in Pfizer's best interest to protect and prevent inappropriate or unauthorized disclosures of our confidential and proprietary information as well as third party confidential and proprietary information provided to Pfizer. Help protect our confidential and proprietary information by following these principles:

• Be careful when using the telephone, fax, telex, e-mail, and other electronic means of storing and sending information.
• Do not forward confidential or proprietary information to non-Pfizer e-mail accounts.
• Terminate your access to any sensitive data no longer needed to perform your job.
• Do not discuss confidential information in public places where others may overhear.
• Never provide confidential information to outsiders without first getting a written confidentiality agreement and approval from the Legal Division.
• Beware of informal telephone or e-mail requests from outsiders seeking information.

Key Term
Confidential or proprietary information can be a formula, pattern, device, information about the Company's business operations, or compilation of information maintained in secrecy that is used in business and gives our business an advantage over competitors who do not know about it or use it.
Patents, Trademarks, and Copyrights

Protecting Pfizer's intellectual property is essential to maintaining the Company's competitive advantage. Pfizer's intellectual property includes its patents, trade secrets, and copyrights, as well as the trademarks, scientific and technical knowledge, know-how, and the experience developed in the course of the Company's activities. You are expected to support the establishment, protection, maintenance, and defense of Pfizer's rights in all commercially significant intellectual property and to use those rights in a responsible way.

In addition to protecting Pfizer's intellectual property rights, you must respect the valid intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose the Company to civil lawsuits and damages. Theft and misappropriation of intellectual property may result in significant fines and criminal penalties for the Company and you.

Q. If something is trademarked, patented, or copyrighted in one country, is it protected in other countries too?

A. No, not necessarily. The Legal Division's Intellectual Property Group tracks the trademark, patent, and copyright status of the Company's assets, as appropriate, on a worldwide basis. To find out if something is trademarked, patented, or copyrighted, contact the Legal Division's Intellectual Property Group to request a search to help you determine whether something has protected status in any country of concern to you.

A Commitment to Innovation

Innovation is the key to improving health and sustaining Pfizer’s growth and profitability.
Privacy of Personal Information

Preserving the privacy of personal information is critically important. Every colleague, as well as job applicants, research study subjects, research investigators, patients, healthcare professionals, vendors, suppliers, and many other people around the world provide personal information to Pfizer.

Sharing personal information with Pfizer is an act of trust. Keeping that information confidential and secure is often a legal requirement and always a demonstration of our commitment to Pfizer’s Values of Integrity and Respect for People.

All Pfizer employees and contractors are accountable for protecting personal information and for processing such information only within the boundaries of applicable law and Pfizer procedures. Help protect the privacy of personal information by following these principles:

• Collect personal information only for legitimate business purposes and keep it only as long as necessary to fulfill those purposes and meet our legal obligations.
• Take adequate precautions to safeguard personal information when collecting, processing, storing, and transferring information.
• Only share personal information with individuals who have a legitimate need for it and will protect it properly.
• When appropriate and in accordance with local laws, give notice and/or obtain consent when collecting, processing, transferring, and storing an individual’s personal information.
• Allow employees whose personal data is held by the Company to review and correct such information.
• Properly destroy records containing personal information according to Company guidelines.

Privacy Laws

Protecting the privacy and security of personal information is a growing global concern for companies and individuals alike. Different countries and cultures have different expectations of what information should be protected, how securely, and at what cost. However, more and more countries are enacting or strengthening privacy laws. These laws strive to give individuals control over their own information and set boundaries on and safeguards for the use of personal information. They also hold violators accountable. For more information on privacy laws and Pfizer’s commitment to data privacy, visit the Privacy website at http://privacy.pfizer.com.
Inside Information

Many of us have heard of restrictions on “insider trading.” Simply put, it is illegal to buy or sell securities (for example, stocks, bonds, options, etc.) when you are aware of “inside information” — material, non-public information — relating to the securities. Pfizer policy prohibits you from using or disclosing — either intentionally or by mistake — any inside information that you may acquire during the course of your employment at Pfizer.

You cannot use information gained through the Company, before this information is known publicly, to buy or sell the securities of any company, including Pfizer. Nor can you give inside information to anyone else so that they can trade. This applies no matter where you live or where the receiver of the information lives.

Securities law violations are taken very seriously. Government agencies are able to monitor trading activities through computerized records searches, with violations resulting in large civil and criminal penalties against companies and individuals.

Key Terms

Material information is any information that an investor might consider important in deciding whether to buy, sell, or hold securities. Examples include financial results or forecasts; changes in dividends; possible mergers, acquisitions, divestitures, or joint ventures; information concerning important product developments or related governmental rulings; major litigation developments; and major changes in business direction.

Information is considered non-public if it has not been adequately disclosed to the public. For instance, public filings with securities regulatory agencies, Company press releases, and meetings and webcasts between the Company and the press or public are generally considered to be adequate public disclosure of information. Not only must information be widely available, there must also be adequate time for the market to become aware of the information before trading would be considered legal.

Q. I am a researcher working on a project with a joint venture partner and I've become aware that our partner is on the verge of a major scientific breakthrough. I want to purchase some stock in our joint venture partner or have my spouse do so. Can I?

A. No. Neither you nor your spouse, nor any other immediate family member, can purchase this stock until the information you have is known to the public. If you use this information or convey it to others, you will be violating Pfizer policy and securities laws and exposing yourself to civil and criminal penalties.
Conflicts of Interest

A conflict of interest arises when you place your personal, social, financial, or political interests before the interests of the Company. Even the appearance of a conflict can damage your reputation or that of the Company. Any potential conflict of interest should be disclosed in writing and approved by your manager and the Legal Division. It is important for you to be familiar with all divisional conflict of interest policies and procedures that pertain to your job responsibilities. For additional information, consult http://PolicySource.pfizer.com.

Many conflicts of interest can be resolved in a simple and mutually acceptable way. The following are several types of conflicts of interest.

Personal Investments or Transactions

While Pfizer respects your right to manage your investments and does not wish to interfere with your personal life, you are responsible for avoiding situations that present — or create the appearance of — a potential conflict between your interests and those of the Company.

To be too specific involves the risk of restricting the application of this policy. However, there are obvious situations that can result in a conflict of interest, such as you or your family member:

• having a substantial financial interest in a supplier, competitor, or customer;
• having an interest in a transaction in which it is known that Pfizer is, or may be, interested;
• taking advantage of Pfizer’s corporate opportunities for personal profit; or
• receiving fees, commissions, or other compensation from a supplier, competitor, or customer of the Company.

Personal Relationships

To avoid conflicts of interest, Pfizer discourages hiring close relatives in the same business unit. The actions of family members and close personal friends outside the workplace can also create a conflict if their actions cause you to lose your objectivity in the workplace.
Outside Employment
A conflict of interest exists if your outside business or other interests can affect your motivation or performance as a Pfizer employee. A second job or affiliation with a Pfizer competitor is not allowed. A second job or affiliation with a customer, supplier, or provider of goods or services is discouraged, but may be allowed with proper management approval. Even when outside employment is allowed, employees are still bound by all confidentiality agreements with Pfizer.

Giving and Accepting Gifts, Entertainment, Loans, or Other Favors
The Company prohibits you — or someone from your immediate family — from giving and receiving gifts, services, perks, entertainment, or other items of more than token or nominal monetary value to or from the Company’s suppliers, customers, or other third parties. Moreover, gifts of nominal value are permitted only if they are not given or received on a regular or frequent basis.

Q. In my country, refusing a gift from a business associate could be considered an insult. What should I do when a gift is offered?

A. In certain cultures, refusing a gift from someone with whom we do business may damage our business relationship with that person. If you do business in one of these cultures, you should consult with your supervisor about how gifts should be treated. If the gift’s value makes it appear that the donor is attempting to influence you, but it must be accepted in order to preserve the business relationship, it may be possible to accept it as Company property. Managers within a country should develop a consistent policy for determining how such gifts should be treated. For example, food items could be placed in a central location for everyone to share, or a clock or painting could be displayed within a Pfizer facility for all to view.

Potential Conflicts of Interest — Questions to Ask Yourself
There is potential for a conflict of interest if your outside financial or other interests or obligations affect your work at Pfizer. Here are some questions to ask yourself to determine if there is a potential conflict of interest:

• Do I have a significant financial interest in any company that does business with Pfizer?
• Do I spend time on outside work or hobbies during my normal Pfizer business hours?
• Do I accept valuable or frequent gifts from suppliers, customers, or competitors? If so, could these gifts influence or appear to influence my decision-making at Pfizer?
• Am I in a position to hire or directly supervise a spouse, relative, or close friend?

If you have questions about conflicts of interest, contact the Corporate Compliance Group.
Our Commitment

Colleagues are Pfizer’s greatest asset, and Pfizer is committed to treating all employees and applicants with fairness and respect. We believe in cooperation, teamwork, and trust. Hostility and harassment are not tolerated at our Company.

To create a safe work environment where people are treated respectfully and fairly, we will:

• provide fair and equitable treatment for all employees;
• abide by all employment related laws and regulations of the countries in which we do business;
• promote a positive and harassment-free work environment; and
• protect the health and welfare of all employees.

We will not:

• engage in any form of discrimination, harassment, or retaliation;
• permit the use of illegal drugs; or
• allow the misuse or abuse of alcohol or prescription drugs in the workplace.

A Commitment to Leadership
We believe that leaders empower those around them by sharing knowledge and rewarding outstanding individual effort. We are dedicated to providing opportunities for leadership at all levels in our organization.

A Commitment to Respect for People
We recognize that people are the cornerstone of Pfizer’s success, we value our diversity as a source of strength, and we are proud of Pfizer’s history of treating people with respect and dignity.
Equal Employment Opportunity

It is the Company’s policy to provide equal employment opportunities and to treat applicants and employees without regard to personal characteristics such as race, color, religion, gender, sexual orientation, age, gender identity or gender expression, national origin, marital status, disability, veteran status, or other characteristics protected by applicable laws.

Managers are responsible for communicating and enforcing this policy. Each operating unit should periodically monitor, report, and, if necessary, correct its performance in the area of equal opportunity.

Discrimination or Harassment

Pfizer values a work environment that is free of verbal or physical harassment. This includes any unwelcome comments or actions regarding race, color, religion, gender, sexual orientation, age, gender identity or gender expression, national origin, marital status, disability, veteran status, or other characteristics protected by applicable laws. This policy applies to conduct that is made a condition of employment; is used as a basis for employment decisions; creates an intimidating, hostile, or offensive working environment; or unreasonably interferes with an individual’s work performance.

Pfizer may be held responsible for the harassment or discrimination of employees by managers, supervisors, other employees, or non-employees if the Company knows (or should have known) about the behavior and fails to take appropriate corrective action.

At-Will Employment

Each Pfizer employee is employed by the Company on an at-will basis (unless otherwise agreed upon in writing and subject to applicable laws). At-will employment means that employment is not guaranteed for any specific amount of time, and the Company retains the right to terminate an individual’s employment at any time with or without cause or notice. No oral representations made by any Pfizer employee with respect to continued employment can alter this relationship.

Q. My co-worker keeps telling racially charged jokes. He thinks they’re funny, but the jokes make me feel uncomfortable. What should I do?

A. Your co-worker should be made aware that his jokes are creating a negative work environment. You are encouraged to do this yourself if you are comfortable doing so. You should also report this to your supervisor, who will be expected to take action, or you can call your Human Resources representative or Open Door Solutions. Where available and permitted by law, you may also call the Pfizer Compliance Hotline.
Q. I know that sexual harassment is a big issue in the United States, but what about outside the U.S. where we have different standards?

A. The concept of respect for our employees is universal and not limited by the geography of any country. All employees throughout the world should have a work environment in which they are shown respect by their colleagues. Therefore, Pfizer’s policies regarding discrimination and harassment apply globally. Consult your local Human Resources representative if you are uncertain about whether certain conduct is consistent with an environment of dignity and respect. In addition, you must follow applicable local laws in your area.

Reporting Discrimination or Harassment

Employees who engage in acts of harassment or discrimination are subject to corrective action that may include termination of employment. Managers are responsible for maintaining business units that are free of harassment and discrimination. Pfizer is also committed to providing an environment that is free of retaliation.

Pfizer promotes open communication throughout the Company to resolve questions, concerns, problems, or complaints involving discrimination or harassment. If you experience or are aware of any discrimination or harassment, you can:

- Talk to your supervisor, Human Resources representative, or an operating unit manager.
- Contact Open Door Solutions, or Corporate Human Resources.
- Contact the Corporate Compliance Group or, where available and permitted by law, the Pfizer Compliance Hotline.
Abuse of Drugs and Alcohol

While we respect individual privacy, we also recognize that substance abuse poses serious health and safety hazards in the workplace. We are dedicated to achieving a substance-abuse-free environment for the health and well-being of employees and for the enhancement of our competitive position.

Pfizer's formal policy and guidelines are compassionate but firm. The use of illegal drugs and the misuse of alcohol and over-the-counter or prescription drugs is prohibited in the workplace during business hours regardless of location.

In addition to pre-employment drug testing, employees may be tested when they display unusual or erratic behavior such that there is a reasonable suspicion of drug or alcohol abuse. Where permitted, employees may be tested on a universal, random basis.

Q. My co-worker has recently been coming into work with alcohol on her breath. While she doesn’t seem impaired, I worry that she may be drunk on the job. I’m afraid to confront her. What should I do?

A. If your co-worker has an alcohol problem, she could be compromising her own and other employees’ safety, as well as her ability to perform on the job. If you feel that sufficient evidence exists that she is under the influence of alcohol while at work, you should speak to your supervisor, contact Human Resources, or call the Corporate Compliance Group.

Q. I think I might have a substance abuse problem. Can Pfizer help me?

A. If you’re concerned that you may have a problem with alcohol or drugs, Pfizer encourages you to seek help by contacting counseling professionals available through Pfizer colleague assistance and support programs. If you request voluntary assistance for a substance abuse problem, you may be eligible for an approved, paid leave to pursue treatment and rehabilitation or other forms of assistance. For more information, please see Pfizer’s Substance Abuse Prevention Policy.

Key Term

An illegal drug includes chemical substances, narcotics, controlled drugs, illicit drugs, or any restricted drugs listed or described in the laws of the locations where Pfizer does business.
Our Commitment

Pfizer is committed to participating actively in and improving the communities in which we do business. In the spirit of working together for a healthier world, we will:

- support our communities;
- protect your safety and the environment;
- respect human life and the welfare of animals;
- respond to all public, media, and government inquiries appropriately;
- conduct political activity responsibly; and
- cooperate with our local host governments.

Corporate Citizenship and Responsible Management

In October 2002, Pfizer joined the United Nations Global Compact, an international network that promotes good corporate citizenship among companies, UN agencies, non-governmental agencies, trade unions, and academic institutions. Pfizer was the first U.S. pharmaceutical company to sign this pact.

In February 2008, Pfizer became a supporter of the Pharmaceutical Industry Principles for Responsible Supply Chain Management. These Principles address ethics, labor, health and safety, and the environment, and are intended to promote socially responsible business practices. Pfizer uses these Principles to evaluate its relationships with key existing and prospective suppliers.

A Commitment to Community

We play an active role in making every community in which we operate a better place to live and work, knowing that its ongoing vitality has a direct impact on the long-term health of our business.
Supporting the Community

Pfizer's medicines and community collaborations positively impact the health of people around the world. Our community collaboration efforts are focused on investing the scope of the company's resources — people, skills, expertise, and funding — to broaden access to medicines and to strengthen healthcare delivery for underserved communities in all corners of the globe.

Through direct engagement and collaboration with local non-governmental organizations (NGOs), multi-lateral organizations (MLOs), governments, and private sector partners, Pfizer strives to develop and implement sustainable programs — and therefore impact global health outcomes. Our efforts include:

- Global Health Fellows Program;
- International Diflucan® Partnership;
- International Trachoma Initiative;
- Global Health Partnerships Program in Oncology and Tobacco Independence;
- Pfizer Helpful Answers® (U.S. only) and various patient prescription assistance programs;
- Pfizer Health Solutions’ Community Based Health Services;
- Employee Matching Gifts Program;
- responding to local and global emergencies such as epidemics caused by natural disasters; and
- many other local, national, and international initiatives.

For additional information on Pfizer’s investments in health, consult Pfizer’s annual Corporate Responsibility Report.

Working Toward Cures

Pfizer participates in a variety of global programs promoting health, teaching vital skills, and increasing access to healthcare.

For instance, Pfizer:

- Supports and helps staff the Global Health Fellows Program, a program in which Pfizer colleagues work with non-profit organizations in the developing world to help address systematic healthcare challenges and provide communities-in-need with valuable technical assistance, knowledge, and vital skills.
- Co-founded the International Trachoma Initiative (ITI), a public-private partnership dedicated to eliminating the world’s leading cause of preventable blindness.
- Provides health education and support, lifestyle change programs, and other community based health services through Pfizer Health Solutions.
Protecting Your Safety and the Environment

As part of Pfizer’s commitment to improving the health and well-being of people worldwide, we strive to effectively manage our natural and workplace environments. To achieve this goal, we adopted the Environment, Health and Safety (EHS) Policy and Guidelines.

Because EHS protection is everyone’s business at Pfizer, you are expected to:

- comply with your facility’s EHS management system’s requirements and your host government’s legal requirements;
- seek to continuously improve our EHS performance;
- maintain safe and environmentally sound operations;
- integrate EHS considerations into your workplace and activities;
- contribute to the common effort to protect the natural and workplace environments;
- foster openness and dialogue with employees and the public; and
- report EHS non-compliance in a timely manner to the appropriate internal contacts in Global EHS Operations and EHS — Legal.

Q. How do I know that my facility is compliant with local environmental and workplace safety laws and corporate policies?

A. Each Pfizer facility is subject to periodic internal EHS audits to identify any potential compliance issues. The audit process mandates that the facility develop and implement an action plan to achieve timely resolution of any issues that are identified.

Environment, Health and Safety Compliance

All employees with EHS compliance responsibilities are trained on Pfizer’s policies and procedures for monitoring and reporting possible violations. Full descriptions of the Environment, Health and Safety Policy and Guidelines are available on the Global EHS Operations intranet site http://ties.pfizer.com.
Human Subject Protection in Clinical Research

Pfizer is committed to the safety of the patients and volunteers who take part in our clinical trials, and to upholding the highest ethical, scientific, and clinical standards in all of our research initiatives worldwide. To ensure appropriate protection and respect for the rights of study participants, all Pfizer-sponsored clinical studies are designed and conducted in accordance with all applicable laws and regulations. In addition, they adhere to globally recognized principles of international ethics including the Nuremberg Code, the Belmont Report, the Declaration of Helsinki, CIOMS International Ethical Guidelines for Biomedical Research Involving Human Subjects and the International Conference on Harmonization Good Clinical Practice (ICH GCP) Guidelines.

Our policies on conducting ethical research are regularly reviewed and updated to keep pace with the increasing complexity and sophistication of clinical trials. We have adopted detailed internal procedures to rigorously ensure ethical and top quality research design, conduct, and follow-up. These procedures reveal Pfizer’s respect for the health, well-being, and safety of research participants as well as for the culture, laws, and regulations of the countries in which studies are conducted. We also have an established monitoring and review system, including appropriate use of independent data monitoring committees, both during and following our research initiatives. All Pfizer-sponsored clinical trials are prospectively reviewed by a qualified Institutional Review Board or Independent Ethics Committee.

Additional information on our clinical research program and Pfizer’s commitment to human subject protection is available at http://integrity.pfizer.com and http://www.Pfizer.com/research.
Animal Welfare

We accept our responsibility for conducting animal research in a humane and ethical manner. Every proposed use of animals in our research is thoroughly evaluated; all animal experiments are carefully planned and conducted to minimize or avoid pain, distress, or discomfort; and the health and well-being of all animals under our care are attended to meticulously. We expect our vendors and third party research organizations to adhere to the same high standards and to comply with all applicable laws and regulations.

Pfizer is also committed to exploring alternatives that reduce, replace, or refine our work with animals. To adopt new non-animal test methods, we are actively developing and refining new and promising technologies that may help predict medical outcomes.

For as long as it remains necessary to use animals in biomedical research and testing, we will maintain high standards of animal care and welfare that meet or exceed those required by applicable local, national, or international laws and regulations.

Media and Public Inquiries

Pfizer is committed to delivering accurate and reliable information to the media, financial analysts, investors, and other members of the public. All public disclosures, including forecasts, press releases, speeches, and other communications, will be honest, accurate, timely, and representative of the facts. Employees are not authorized to answer questions from the media and the public. When approached for information, you must record the name of the person making the inquiry and immediately notify Media Relations or Worldwide Communications.
Political Activity

While Pfizer encourages employees to participate in electoral politics in those countries where appropriate, such activity must occur strictly in an individual and private capacity and not on behalf of the Company. Employees may not conduct personal political activity on Company time or use Company property or equipment for this purpose.

U.S. employees, both domestic and abroad, may support the activities of Pfizer in Action and the Company’s Political Action Committee — but any such support must be voluntary and in accordance with applicable laws.

Government Investigations: Requests for Information or Facility Visits

Pfizer cooperates with all government agencies in any request for information or facility visits in connection with government investigations. The Legal Division represents the Company in such situations and will determine what information is appropriate to supply to investigators.

If you work in the U.S. and are contacted by any government agency, notify the Legal Division or the Corporate Compliance Group for assistance. If you work outside of the U.S. and are contacted by a government agency, notify your local lawyer, your supervisor, or the Corporate Compliance Group immediately.

The Corporate Compliance Group must be notified of all government requests for information or facility visits that involve a “Referable Compliance Issue” or have the potential to expose the company or its employees to criminal or significant civil or administrative penalties. All searches and raids by officials are considered “Referable Compliance Issues” and should be treated as such. Wherever there is doubt, it is best to notify the Corporate Compliance Group.

Q. I am running for a public office, a spot on the local school board. I want to send out an e-mail to my colleagues at work letting them know about a fundraiser I’m having. May I?

A. No. Although employees are permitted to make occasional use of e-mail, you are prohibited from using Company property and equipment, which includes corporate e-mail addresses, for political purposes.
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Confidentiality

It is essential that you feel secure when participating in the Company's compliance system. Therefore, confidentiality is a priority and every effort will be made to protect your identity whenever you interact with any element of the compliance system. In some instances, however, it may be impossible to keep your identity confidential because of the demands of conducting a thorough investigation or because of certain legal requirements. If you are concerned about confidentiality, you may consider placing an anonymous call to the Pfizer Compliance Hotline.

Q. If I report a concern to the Corporate Compliance Group, can I expect a response?

A. Yes. The Corporate Compliance Group's goal is to respond promptly to all questions and reported concerns. If your concern requires an investigation, the Corporate Compliance Group will do so promptly. Whenever possible, you will be informed about the status of the investigation and the outcome of a matter. However, the Corporate Compliance Group has confidentiality obligations to all employees — those being investigated as well as those making reports. Detailed information about any matter will only be shared with those who "need to know."