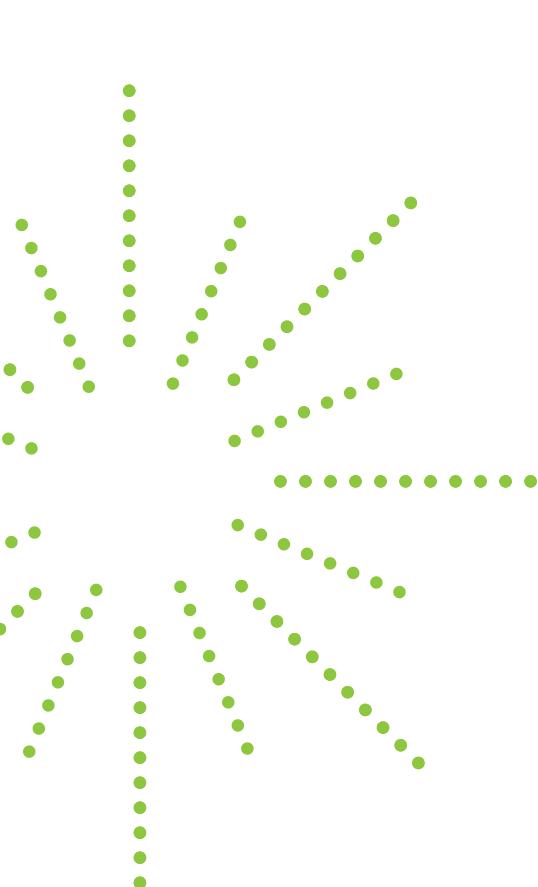




The Blue Book

Summary of Pfizer Policies on Business Conduct





Dear Colleagues,

Integrity is one of Pfizer's fundamental values. To continue growing our business and strengthening our partnerships with patients and the industry, we must be known as a company built on ethics, quality and integrity. Every decision we make matters. Each of us is responsible for understanding the important legal and ethical issues that affect our business and for conducting ourselves with integrity at all times. Not only must we comply with applicable laws and policies, but we must also exercise good judgment in making informed decisions.

This Code of Conduct, or *Blue Book*, and its companion website, integrity.pfizer.com, are essential resources for all colleagues. They outline Pfizer's values through its policies on business conduct, identify the channels for asking questions and raising concerns, and provide information and materials that help reinforce our culture of integrity. Please familiarize yourself with the *Blue Book* and bookmark integrity.pfizer.com. These references will help you conduct your day-to-day business activities legally, compliantly and ethically.

All of Pfizer's leaders are open to conversations regarding company practices, the workplace environment or colleague conduct. Seeking advice, raising concerns, or reporting misconduct is encouraged and will not be held against you. Our Open Door and anti-retaliation policies are in place to encourage and protect colleagues who raise concerns.

Conducting ourselves with integrity helps us to earn the trust and respect of our stakeholders, and this trust is the foundation for our success. Thank you for your commitment to integrity, quality and compliance at Pfizer.



Albert Bourla

Chief Executive Officer

integrity is...

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The Pfizer Values



Collaboration



Community



Customer Focus



Innovation



Integrity



Leadership



Performance



Quality



Respect for People

integrity is...

...a core Pfizer value. We are committed to performance with integrity each and every day.



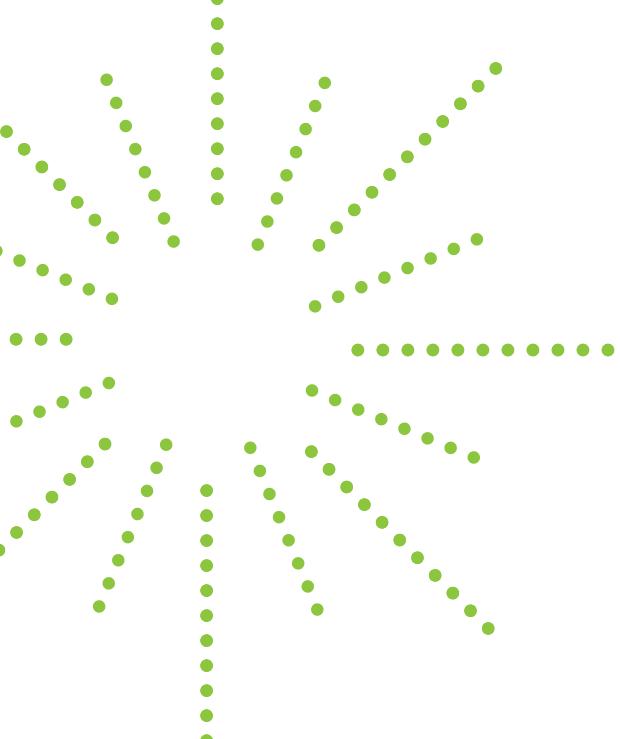


	own...the business	Seize opportunities to think differently, take risks and be accountable; try something new
	win...in the marketplace	Advocate and drive long-term, aligned strategies that advance our mission and shape the industry
	no jerks...let's discuss behaviors	Confront corrosive, self-serving and mean-spirited behaviors; it's everyone's responsibility
	impact...results	Deliver on commitments with speed, decisiveness and integrity
	trust...in one another	Invest in candid and constructive debate to ensure each other's success; it's time for straight talk



Owning Integrity





Owning Integrity

Our Commitment

Each of us is responsible for upholding Pfizer's reputation and high standards by taking ownership of performance with integrity.

- **Know the standards, and live by them.** By knowing, understanding and acting in accordance with Pfizer's values, Company policies and applicable laws, each of us can serve as a role model.
- **Ask questions.** If we have questions about the policies, procedures and laws that apply to our roles, we must ask our managers, HR colleagues or members of the Legal or Compliance Division.
- **Raise concerns.** If we believe someone may be violating a law or policy, or is not acting according to Pfizer's values, we must raise our concerns. Pfizer management is dedicated to ensuring that our standards are upheld and any concerns are addressed. Retaliation against someone who raises a concern is strictly prohibited.
- **Always act with integrity.** We are never permitted to violate a law or policy, nor should we ever feel encouraged or pressured to do so.

Our Standards

This *Summary of Pfizer Policies on Business Conduct*, also known as the *Blue Book*, is a guide to the Company's compliance structure and key standards. The *Blue Book* summarizes a number of corporate policies and procedures that govern doing business in a legal and ethical manner. All colleagues are subject to the laws and regulations of the country in which they work. Because Pfizer Inc. is a US company, US law may also apply to conduct outside the United States. In addition, all colleagues are responsible for understanding and following the Pfizer policies and procedures that apply to their roles and responsibilities.

If you are unclear about which standards apply to you, or how to comply with them, it is your responsibility to seek guidance; consult with your manager or Human Resources, or contact the Legal or Compliance Division.

Pfizer also holds its vendors and contingent workers to high standards. They are expected to comply with all laws and relevant policies and procedures that apply to their work conducted on Pfizer's behalf.

integrity is...our promise to patients



Pfizer's Compliance Program

Pfizer's compliance program is designed to support legal and ethical conduct throughout the Company. The **Chief Compliance and Risk Officer** oversees Pfizer's compliance program and, with the **Compliance Division**, works to address risk areas and ensure adherence to our standards.

Pfizer's tiered **compliance committee structure** promotes leadership oversight and complements our **embedded divisional and business unit compliance** organization. **Additional compliance support** is provided by groups and individuals in areas such as Legal, Safety, Audit, Human Resources, Finance and Corporate Governance.

The Compliance Division has exclusive responsibility for investigating **referable compliance issues (RCIs)**—significant potential, suspected or actual violations of law or policy. The Compliance Division determines the scope of investigations and may seek help in investigating RCIs from other individuals and groups. No investigation into an RCI may begin without the express consent of the Compliance Division.

In addition, the Compliance Division is responsible for ensuring that the Company fulfills its obligations, including required training, reporting and monitoring, under its **corporate integrity agreement (CIA)** with the US Office of Inspector General of the Department of Health and Human Services (OIG). Pfizer entered into a CIA in 2018 to resolve civil allegations relating to financial donations Pfizer made to independent charity patient assistance programs for co-pay patient assistance prior to 2017.* Pfizer may be obligated to disclose information relating to certain violations of Company policy or law as part of this agreement.

* See p. 43 for additional information on independent charity patient assistance programs.



integrity is...our promise to patients

When we act with integrity, we earn respect from society and do our best work for patients.



OWN IT!

**Explore Head, Heart and Guts leadership in your work.
Use your HEAD: Think through your decisions.**





How is compliance with Pfizer's standards enforced?

Any violation of a law or Company policy or procedure may result in disciplinary action, including termination of employment (subject to applicable law), particularly if you:

- knowingly and intentionally violate law, policy or procedure;
- direct others to violate law, policy or procedure;
- fail to cooperate in a Company investigation of possible violations;
- retaliate against another colleague for reporting a concern or a violation; or
- fail to effectively monitor the actions of subordinates.

Consequences of non-compliance with our standards may include:

For Our Company

Damage to Pfizer's reputation, prosecution or fines, disclosure to government agencies, loss of business

For Our Colleagues

Prosecution, fines or imprisonment, disciplinary actions, damage to personal reputation, serious injury or illness

For Patients, Customers and the Public

Compromised product safety or efficacy, environmental risk, higher cost of medicines, loss of good faith and trust in dealings with Pfizer

For Our Investors

Loss of confidence in Pfizer and its products, loss of investment value, damage to Pfizer's reputation for good corporate governance

Our Responsibilities

As a Pfizer colleague, you share the privilege and responsibility of upholding the Company's reputation. You do this each time you act ethically and legally. There are situations in which making the right decision can be challenging. If you have a question or concern, reach out—there are many resources available to help you.

You are also responsible for raising concerns about risks to the Company as soon as you are aware of potential issues—ideally, before these risks become actual problems. By raising concerns, you give management the opportunity to address potential problems and protect the Company, colleagues and the public.

If you reasonably believe that a colleague or anyone else doing work on behalf of Pfizer has violated or may violate a law or Pfizer policy or procedure, or is not acting according to the Company's values, you have a responsibility to report that information immediately to your manager, another manager, Human Resources or the Legal or Compliance Division. Pfizer has Open Door, anti-retaliation and confidentiality policies to help protect you. However, intentionally making a false report is a serious violation of Company policy that the Company will address accordingly.

See Corporate Policies 201 and 205 on policysource.pfizer.com for more information on our commitment to integrity and raising concerns.



Raising Concerns, Presenting Ideas and Asking Questions

At Pfizer, many channels exist for asking questions, presenting ideas and raising compliance or other concerns. When in doubt, reach out.

Open Door Policy

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

While we hope you feel comfortable discussing any matter with your manager, there may be times when you prefer to use another avenue for addressing issues. You should feel comfortable speaking with others, including:

- the next higher level of management,
- your operating unit head,
- any other manager in the Company,
- Human Resources,
- the Legal Division or
- the Compliance Division.

See Corporate Policy 702 on policesource.pfizer.com for more information on the Open Door Policy.

Human Resources

Human Resources colleagues are available to listen to any concerns you may have. You may reach out to your local Human Resources representative, the Employee Relations Group or Corporate Human Resources.

Personal Disclosure Requirements

If you have been excluded, debarred or suspended, or have become otherwise ineligible to participate in US federal healthcare or procurement or non-procurement programs, you must disclose this immediately to the Compliance Division. You also must disclose if you are under investigation for certain criminal offenses for which you may become excluded, debarred or suspended.



Which standards apply?

Reach out if you need help determining which laws (e.g., local, regional, extra-territorial), policies (e.g., local, divisional, global), procedures or other standards may apply to your role. If you have any questions, contact your manager or the Legal or Compliance Division.

OWN IT!

Explore Head, Heart and Guts leadership in your work.
Use your HEART: Inspire others to ask questions and raise concerns.



Referable Compliance Issues (RCIs)

RCIs are significant potential, suspected or actual violations of applicable law or Company policy that must be reported to the Compliance Division for investigation. Whether a matter is significant depends on the 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 colleagues or the public to dangerous health or safety risks?
- What are the potential consequences, including financial, operational, legal or reputational?
- What is the overall extent and severity of the violation?
- What is the nature of the law, regulation, policy or procedure involved?
- Is the violation the subject of investigation by a government or regulatory entity?

If you are unsure whether a matter is an RCI, contact the Compliance Division.

The Compliance Division

You can contact the Compliance Division directly to report a concern, present an idea or ask a question:

- by email: corporate.compliance@pfizer.com
- by phone: 1-212-733-3026
- by secure fax: 1-917-464-7736
- by mail or in person: 235 East 42nd Street, New York, NY 10017

You can use the Compliance Division website to find policies and procedures, resources, contact information and more. Visit integrity.pfizer.com.

The Compliance Helpline

The Compliance Helpline provides a way to report a concern or get information or advice. The Compliance Helpline is available by phone and web-reporting tool 24 hours a day, 7 days a week, 365 days a year, and is operated by specially trained third-party representatives. The reported information is provided to the appropriate Compliance group within Pfizer, which will take appropriate action. You can follow up via the Compliance Helpline regarding your inquiry or concern.

You are encouraged to identify yourself when using the Compliance Helpline; this helps ensure a thorough response or investigation. However, anonymous reports may be made through the Compliance Helpline in the United States.

Anti-Retaliation

Retaliation against someone who seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Some examples of retaliation include denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. If any individual, regardless of his or her role in Pfizer, retaliates against a colleague who has reported a potential violation, Pfizer will take appropriate action—even if no violation is ultimately confirmed.

If you believe that you or another colleague has been retaliated against for seeking advice, raising a concern, reporting misconduct or providing information in an investigation, you should contact the Compliance Division, the Employee Relations Group or Corporate Human Resources immediately. In the United States, you may also use the Compliance Helpline.

See Corporate Policy 702 on policysource.pfizer.com for more information on our anti-retaliation policy.

Pfizer Compliance Helpline

1-866-866-PFIZ (7349) or
pfizer.ethicspoint.com



Confidentiality

It is essential that you feel secure when raising any Open Door or compliance issue. Confidentiality will be maintained to the fullest extent possible. In some instances, however, it may not be possible to keep your identity confidential because of the nature of the investigation, the demands of conducting a thorough investigation or certain legal requirements. In the United States, colleagues concerned about confidentiality may consider making an anonymous report through the Compliance Helpline.

If you are involved in a compliance investigation in any capacity (for example, as a witness or complaining party), you are expected to keep the details of the investigation confidential. Maintaining confidentiality helps to preserve the integrity of the process and protects the individuals participating in the investigation. Unless prohibited by local law, any exceptions to confidentiality must first be discussed with the Compliance Division colleague investigating the matter.

AT-A-GLANCE

How do I ask questions, present ideas or raise concerns?

Colleague Points of Contact Discuss questions, ideas and concerns without fear of reprisal. Many people are available to help; consult the person with whom you feel most comfortable.	Contact <ul style="list-style-type: none">Your manager or any other managerYour Compliance or Legal Division contactHuman Resources
Compliance Division Contact the Compliance Division directly to ask questions, present ideas or raise concerns.	Contact <ul style="list-style-type: none">Your Compliance Division contactcorporate.compliance@pfizer.com1-212-733-30261-917-464-7736 (secure fax)235 East 42nd Street, New York, NY 10017
Compliance Helpline Report concerns through the helpline web-reporting tool or phone line. Anonymous reporting is available.	Contact <ul style="list-style-type: none">pfizer.ethicspoint.com1-866-866-PFIZ (7349)
Pfizer's Intranet Find policies and procedures, resources, contact information and more.	Contact <ul style="list-style-type: none">integrity.pfizer.compolicysource.pfizer.comintegrityprograms@pfizer.com



I observed misconduct, but I'm afraid to report it because I fear retaliation. How will the Company protect me?

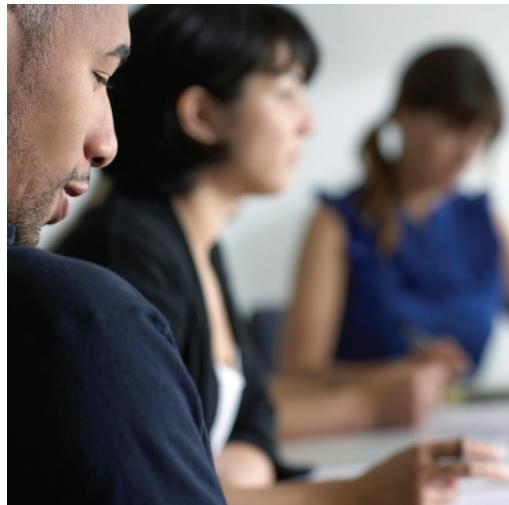
If you report misconduct, the Company will take action to protect you from retaliation. The specific steps taken will vary from case to case; they may include disciplinary action for anyone who engages in retaliatory actions, ongoing monitoring of the situation or other measures to protect you. It is important to raise any concerns about retaliation so that the Company can take appropriate steps.



If I report a concern to the Compliance Division, can I expect a response?

Yes. The Compliance Division's goal is to respond promptly to all questions and reported concerns. If your concern requires investigation, the Compliance Division will conduct the investigation and, where possible and appropriate, provide an update. However, because of confidentiality concerns, detailed information about matters will be shared only with those who need to know.





Pfizer's Office of the Ombuds

Pfizer's Office of the Ombuds provides an informal place where Pfizer colleagues can confidentially get information and guidance to help address and resolve work-related issues. Pfizer's Ombuds is independent and neutral, and is not an advocate for any party, but rather an advocate for fair process.

Pfizer's Ombuds supplements, but does not replace, other resources for issue resolution, such as management, Human Resources and the Legal and Compliance Division. If colleagues want to make a formal complaint, put the Company on notice of any claim or have an issue documented, they must use one of Pfizer's other channels for reporting concerns, described elsewhere in this *Blue Book*.

While Pfizer's Ombuds provides assistance and guidance, any action taken is up to the colleague—except where the Ombuds determines that there appears to be an imminent risk of serious harm, in which case the Ombuds must take the issue forward if the colleague declines to do so.

You may use Pfizer's Office of the Ombuds when you:

- don't know where or how to take an issue forward,
- aren't sure if what you observed is unethical or violates law or policy,
- would like help identifying options for addressing workplace concerns,
- want a neutral sounding board to help evaluate options or
- want to talk off-the-record to a neutral professional who has extensive knowledge of Pfizer's policies and practices before taking a formal step.

Contact the Office of the Ombuds

1-855-PFE-OMBD (1-855-733-6623)
or ombuds@pfizer.com

For more information, visit:
ombuds.pfizer.com

OWNIT!

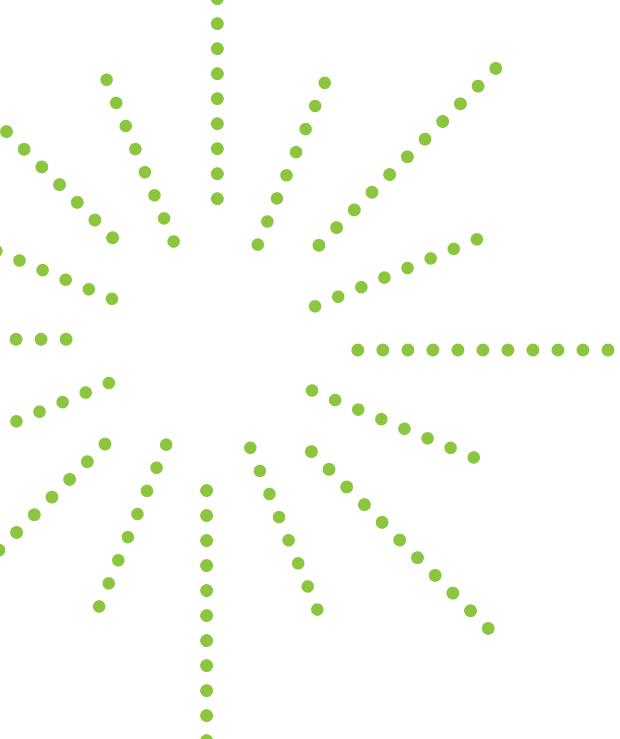
Explore Head, Heart and Guts leadership in your work.
Use your GUTS: Be courageous and demonstrate accountability
and integrity in the face of challenging decisions.





Our Industry





Our Industry

Our Commitment

Pfizer is committed to acting with integrity in all aspects of our work, including research, development, manufacturing, distribution, marketing, government interactions, sales and promotion. We will comply with all applicable laws and regulatory requirements. We will act responsibly in our relationships with all stakeholders, including healthcare professionals, patients, consumers, hospitals, academics, governments, regulatory entities, business partners, customers, suppliers and vendors. We are committed to conducting our business in a way that ensures fair competition, and we will be honest and fair in all our business dealings.

Healthcare Laws and Regulatory Requirements

Pfizer is subject to many rules and regulations designed to protect patients and consumers, improve the quality of medicines and healthcare services, and help eliminate fraud and improper influence on medical judgment.

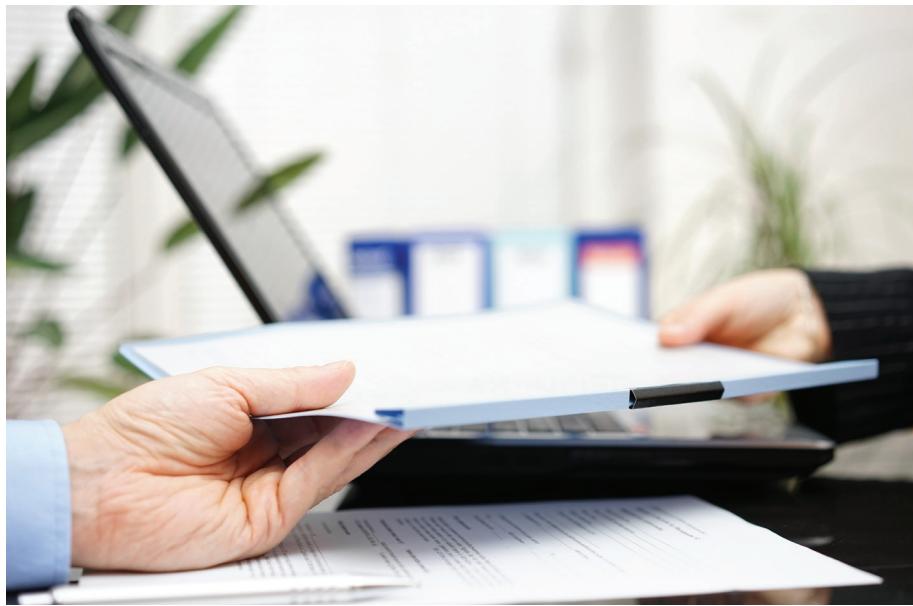
We are committed to following the laws and regulatory requirements that govern our business, including the development, manufacturing, distribution, marketing, government contracting, sale and promotion of our products. Because Pfizer is a global company, the laws and regulatory requirements of one country may apply to activities in another country. In the event that local laws and regulatory requirements differ from Pfizer policy, the stricter requirements generally apply.

integrity is...accountability

We are each accountable for our choices and actions, and for delivering results with integrity.

You must be familiar with the standards that apply to your business and your role. If you have questions about which laws, regulations, policies or industry standards apply to your work, consult with your manager or contact a member of the Legal or Compliance Division.

integrity is... accountability



My Anti-Corruption Policy and Procedures (“MAPP”)

MAPP includes our corporate policy against corruption, as well as key principles and specific procedures, primarily for business interactions outside of the United States or involving non-US entities or individuals. Colleagues are responsible for complying with MAPP and their regional standard operating procedure implementing MAPP.

Anti-Bribery and Anti-Corruption

Pfizer prohibits Pfizer colleagues and anyone acting on Pfizer’s behalf from offering, giving, requesting, accepting or receiving a bribe.

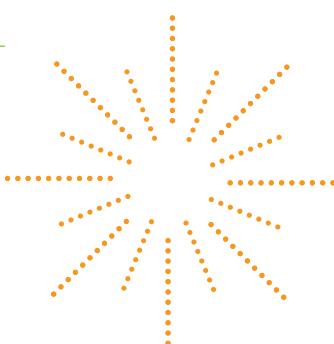
Government Officials

No colleague nor anyone acting on Pfizer’s behalf may ever offer, authorize or provide a payment or benefit that is intended to improperly influence—or even appear to improperly influence—a government official or gain any 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 improperly influence an official act or decision to award or retain business or gain a business advantage.

The US Foreign Corrupt Practices Act (FCPA) regulates US companies doing business abroad. The FCPA makes it illegal for employees of US companies, wherever they are located, to directly or indirectly give anything of value to a non-US government official, candidate for public office, political party or party official in order to gain an improper business advantage. The FCPA also makes it illegal to inaccurately record transactions in our books and records.

Visit policysource.pfizer.com for MAPP and Corporate Policy 207: Pfizer’s Global Policy on Interactions with Healthcare Professionals (GPIHP).





I travel around the world for work. If something is considered a “customary courtesy” in one country but may be viewed as a bribe in another, what does that mean for me?

You must not provide any payment or benefit of any kind to gain an improper business advantage. You must always comply with Pfizer policy and applicable laws. Visit the Anti-Corruption Program Office website at acpo.pfizer.com for more information, and contact the Legal or Compliance Division for guidance.

As a US company, Pfizer Inc. and all of its subsidiaries and colleagues must comply with the FCPA, as well as all local anti-bribery and anti-corruption laws. We must be particularly sensitive to bribery and corruption issues because governments are often both the regulators of our products and major customers. We also interact regularly in various ways with healthcare professionals and scientists, many of whom are employees of public institutions and may be considered government officials.

Commercial Individuals and Entities

Pfizer also prohibits “commercial bribery.” Generally, commercial bribery is giving, offering, requesting, accepting or receiving something of value to or from an individual or company to secure an improper advantage in commercial conduct. Pfizer prohibits any colleague or anyone acting on Pfizer’s behalf from directly or indirectly engaging in any form of commercial bribery.

Anti-Kickback Laws

In the United States, the federal anti-kickback law prohibits offering anything of value (whether in cash or in kind) that is intended to influence an individual's decision to recommend, prescribe, endorse or purchase a healthcare product or service that is reimbursed by a federal healthcare program, such as Medicare and Medicaid. The law may be violated even if only one purpose of the value provided is to induce a referral or purchase. The purpose of the law is to ensure that a healthcare provider's treatment recommendation is not influenced by motives of personal gain or enrichment. For example, entering into an arrangement with a healthcare provider that is unnecessary or paying for services above fair market value for the service received to induce the healthcare provider to prescribe a Pfizer product are examples of arrangements that are prohibited. Equivalent laws exist in many US states and in many countries around the world.

Similarly, US law provides for the imposition of civil monetary penalties against any person who offers or transfers remuneration to a Medicare or state healthcare program (including Medicaid) beneficiary that is likely to influence the beneficiary's selection of a particular provider or supplier of a healthcare product or service that is reimbursed by a federal healthcare program.

The federal government has created a number of “safe harbors” such that if a transaction, relationship or payment meets the requirements of a safe harbor it can be protected from civil or criminal liability.





In 2013, Pfizer became the first pharmaceutical company to earn accreditation from the Association for the Accreditation of Human Research Protection Programs (AAHRPP) for all phases of its global clinical development activities (certain units received accreditation in 2009).

US Congress

In the United States, Pfizer is a registered federal lobbyist. As such, federal law prohibits any Pfizer colleague from providing anything of value to a member or staff member of the US House of Representatives or the US Senate, and severely limits the ability of Pfizer to pay for travel expenses of US House and Senate Members and staff. All Pfizer colleagues, regardless of location, must follow these restrictions.

Research and Development

Our purpose is to innovate to bring therapies to patients that significantly improve their lives. Our priorities are ensuring the safety and protecting the rights of those who take part in our clinical trials and upholding the highest ethical, scientific and medical standards in all of our research activities. The science we perform at Pfizer is without value unless it rests on a fail-safe foundation of integrity.

All colleagues are responsible for acting in a manner consistent with Pfizer's high expectations for quality and integrity in research and development, and for reporting concerns through any of the many channels available, including those described in this *Blue Book*.

Pre-Clinical Research

We are committed to conducting research in compliance with all applicable laws and regulations, as well as recognized international ethical guidelines such as good laboratory practices (GLP).

Additional Resources

www.pfizer.com/research
www.pfizer.com/development



We are committed to a quality culture in which every colleague understands and takes ownership of the responsibility for protecting product quality and patient safety.



Conduct of Clinical Research

All Pfizer-sponsored clinical studies are designed and conducted in accordance with applicable laws and regulations, as well as recognized ethical standards such as good clinical practices (GCP). All clinical investigators are trained on study protocol and applicable scientific and ethical standards. We regularly audit and monitor clinical study sites and processes related to our clinical trials.

Data Integrity

Pfizer is committed to maintaining the integrity and quality of clinical data from our sponsored studies to ensure that our submissions are built upon data of the highest quality. Our processes and procedures drive quality, compliance and performance at every stage.

Public Disclosure

We recognize the importance of making clinical studies and results available. We register certain studies and post basic results on [clinicaltrials.gov](#). We are committed to the development of publications that report the results of Company-sponsored clinical research studies accurately and objectively and to the disclosure of funding and editorial support.

Human Subject Protection

Our policies and procedures aim to ensure 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. Our interventional trials adhere to globally recognized principles of international ethics and are prospectively reviewed by a qualified Institutional Review Board or Independent Ethics Committee. Many of our trials use independent data-monitoring committees to help ensure patient safety, in addition to internal reviews conducted by our physicians and safety professionals.

Animal Welfare

We are committed to conducting our animal research in a responsible, humane and ethical manner. Pfizer supports the development and adoption of novel, non-animal test methods for assessing the safety of new products that can reduce, replace or refine the use of animal testing. For those new products that require animal testing, we maintain high standards of animal care and welfare consistent with or exceeding those required by law.

See Corporate Policy 901 on [policysource.pfizer.com](#) for more information on animal welfare.



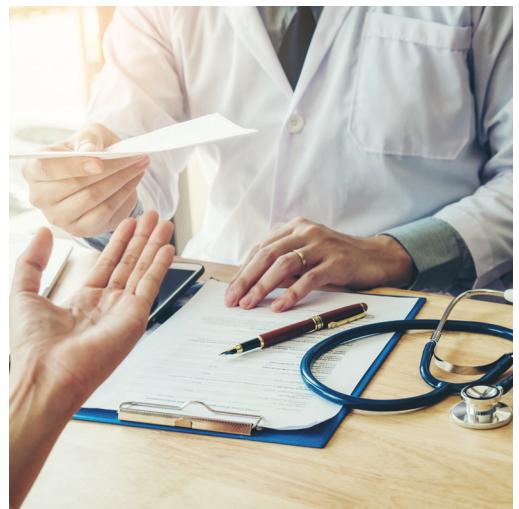
Manufacturing and Supply Quality

Our reputation is built on trust. Patients, consumers and others rely on Pfizer products to improve health and enhance the quality of people's lives. Product quality, safety and efficacy are critical components of the trust people place in Pfizer. We operate a comprehensive and robust quality management system designed to ensure the production and supply of quality products.

We are committed to ensuring that our products are manufactured and supplied to high standards of quality. We are also committed to conducting our manufacturing operations in compliance with applicable regulatory requirements, good manufacturing practices (GMP) and our own internal rigorous quality standards. We also require that our suppliers and partners adhere to high standards, and we conduct audits and oversight of our supply chain.

We must perform our responsibilities in a manner consistent with Pfizer's unwavering commitment to quality and compliance, and report quality issues and concerns through the appropriate channels, including those described in this *Blue Book*.

See Corporate Policy 114 on policysource.pfizer.com for more information on our commitment to quality.



Interactions with Patients and Patient Organizations

At Pfizer, the ability to interact with patients and patient organizations (POs) is essential to fulfill our purpose of bringing therapies to patients that significantly improve their lives. Pfizer is committed to the highest standard of integrity and compliance when engaging with patients and POs. POs are generally defined as not-for-profit entities that represent the needs of people living with medical conditions, their families or other caregivers. Such organizations may focus on a specific disease area or be umbrella groups representing a range of patients at a national or global level or numerous disease-specific groups at a regional level. Within Pfizer and across the broader patient community, POs may be referred to interchangeably as "patient organizations," "patient associations," "patient advocacy groups" or "patient groups."

Our focus on patients is at the core of who we are as a Company; addressing the unique needs and challenges of patients is paramount. All interactions with patients must be respectful and executed in a manner consistent with our applicable laws, regulations, industry standards and codes, as well as Pfizer's values. Given complex and evolving legal, regulatory and industry requirements on interactions with patients and POs, including interactions with POs relating to certain patient assistance programs, please consult Legal and Compliance in your markets to help ensure compliance.

Want More Information?

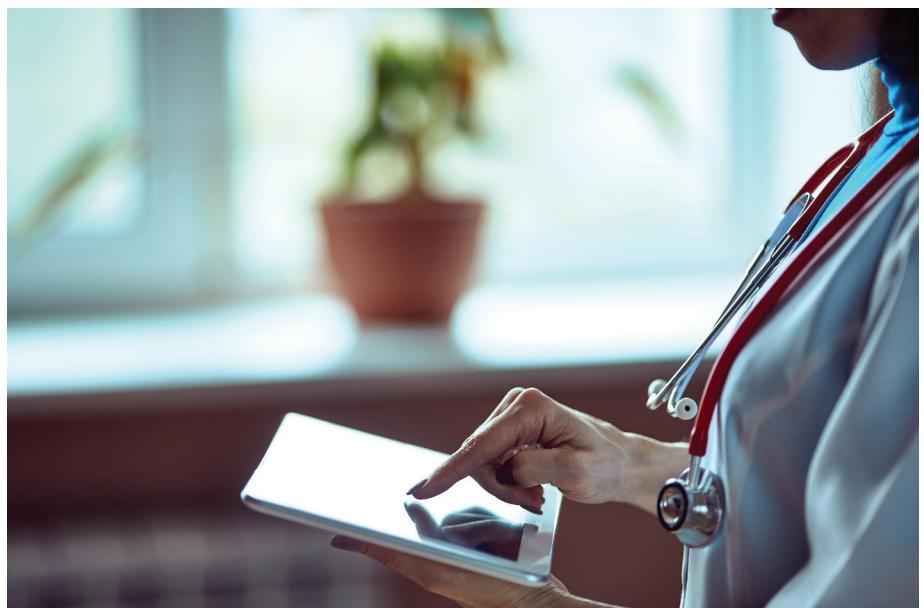
integrity.pfizer.com
policysource.pfizer.com

Contact the Legal or Compliance Division.

The definition of a healthcare professional can vary by location and business unit and may include: physicians, nurses, pharmacists and any others who administer, prescribe, purchase, recommend or are in a position to influence the use of our products.

Communicating Product Information Honestly

Trust is a significant part of our business. Medical professionals trust our research and results. Consumers trust the quality of our products. Shareholders trust that we will continue to seek to build shareholder value. That is why Pfizer is committed to providing timely and honest product information to patients, consumers, healthcare professionals and regulators worldwide to keep these stakeholders informed about the appropriate uses for our products and the efficacy and safety data relating to those uses.



The Marketplace and Interactions with Healthcare Professionals

We interact with healthcare professionals and other customers in many ways, including medical information communications, promotional activities, research and educational efforts.

We are committed to the highest standards of integrity and compliance with applicable laws and regulations in every aspect of our relationships with healthcare professionals.

We are committed to integrity in our marketing practices. All promotional materials and communications must be accurate, not misleading and compliant with all applicable medical, legal and regulatory standards, including applicable standards addressing substantiation, scientific rigor and fair balance. We will not engage in illegal or unfair activities such as false or misleading advertising; bribery of competitors, customers or healthcare professionals; or unfair comments about competitors' products.

We also must comply with Pfizer policies and procedures on labeling, promotional programs, product samples and other topics that affect our roles and responsibilities. Contact a member of the Legal or Compliance Division with questions about which standards apply.

See Corporate Policy 207 on policysource.pfizer.com for Pfizer's Global Policy on Interactions with Healthcare Professionals (GPIHP).



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. It is your responsibility to be aware of these laws and their implications, including how they apply in the country in which you operate.

Pfizer prohibits:

- direct or indirect discussions or contact with competitors about pricing, costs or terms or conditions of sale;
- direct or indirect discussions or contact 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.

In October 2016, the Department of Justice announced its intent to pursue criminal charges (in addition to traditional civil charges) against human resource professionals and other corporate employees for entering into wage-fixing or no-poach agreements or discussing these topics with competitors.

Many countries have antitrust or competition laws, though these vary significantly from country to country. For example, certain countries' competition laws may be more or less stringent than those of the United States in relation to, 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 must ask for advice from the Legal Division before you act.

See Corporate Policy 603 on policesource.pfizer.com for more information on compliance with antitrust laws.

A friend and former Pfizer colleague now works for one of our competitors. Is it okay to discuss how her company deals with managed care companies?

No. Competitively sensitive information may not be discussed with friends or former colleagues employed by competitor companies whether in a business or a social setting.



Trade Association Meetings and Other Industry Gatherings

Trade association meetings and other industry gatherings can 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 laws. Even joking about inappropriate topics—such as marketing or pricing strategies—could be misinterpreted and misreported. If any kind of anti-competitive discussion arises during the meeting, you should refuse to discuss the matter, leave the meeting immediately, have your exit recorded in the minutes and report the incident to the Legal Division. Due to the potential risks, prior legal authorization is required before initial participation in a trade association or industry collaboration.



At a dinner party, a Pfizer colleague learns that her friend used a Pfizer product and experienced a headache. Does she need to report this?

Yes. Regardless of how she learns of the event, the severity or whether she thinks it was a side effect of the Pfizer product, it is her responsibility to report it within 24 hours from when the information was received.

Ensuring and Monitoring the Safety, Quality and Performance of Our Products

We are committed to providing products that are safe, effective and of the highest quality. Understanding a product's safety profile, as well as its quality and performance characteristics, is essential. That's why we all share responsibility for reporting safety, quality or performance issues concerning Pfizer products.

Not only do we have an ethical and scientific responsibility to collect, process and evaluate this information, but we also have a legal obligation to track and report relevant safety and quality information to regulatory authorities.

We may learn of adverse events or issues with a Pfizer product in many ways: phone calls, websites, information received from Pfizer programs and studies, meetings or casual conversations. Colleagues are responsible for forwarding this information to the local Drug Safety Unit or appropriate Pfizer contact within 24 hours from when the information is received; reporting responsibilities and timeframes for vendors and contingent workers may vary depending on role.

Certain instances that may lead to increased risk of an adverse event must also be reported. These include, among other things, medication errors such as incorrect prescribing, as well as any situation in which a fetus or baby may have been exposed to a Pfizer product during pregnancy or breastfeeding.

See Corporate Policy 903 on policysource.pfizer.com for more information on how we ensure patient safety.

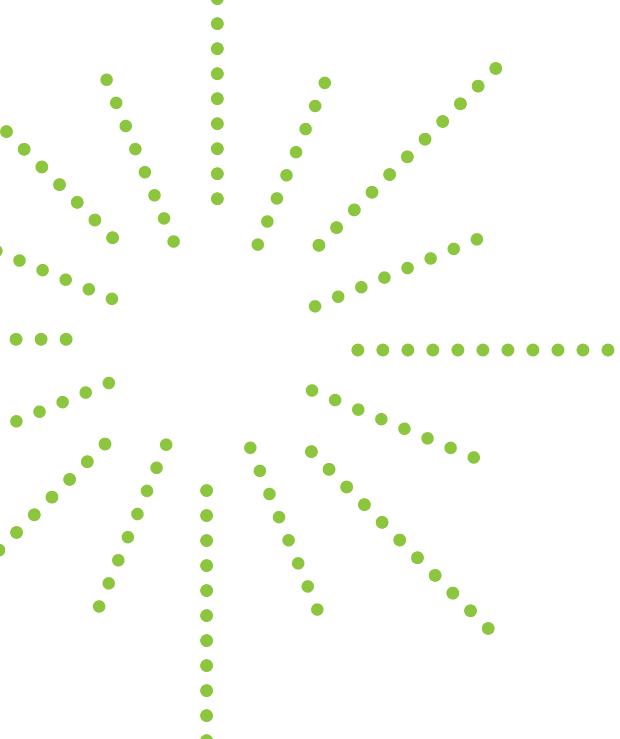


To make a product safety report,
call 1-800-438-1985.



Our Company





Our Company

Our Commitment

Pfizer is committed to pursuing sound growth and earnings while maintaining integrity in all that we do. We will abide by all applicable laws, regulations and other standards. 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 assets, information and resources. We will avoid conflicts of interest and use social media responsibly.

Patents, Trademarks and Copyrights

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

You must also respect the intellectual property of others. Unauthorized use, theft or misappropriation of third-party confidential information or intellectual property may result in significant fines, lawsuits, injunctions or criminal penalties for the Company and you. Contact the Legal or Compliance Division if you have any questions or concerns.

Books and Record Keeping

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 financial statements, as well as time sheets, vouchers, bills, invoices, expense reports, payroll and benefits records, performance evaluations and other essential Company data.



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

Not necessarily. The Legal Division's Intellectual Property Group tracks the status of the Company's assets and can help you determine whether something has protected status in a particular country.



integrity is... trustworthiness



integrity is...trustworthiness

Every decision we make becomes a part of Pfizer's story. Making decisions with integrity is how we earn the trust of patients, our business partners, our investors and society.

Reporting Accounting Fraud

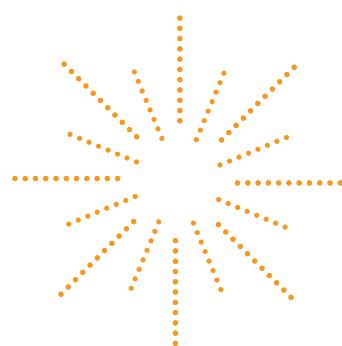
It is your responsibility to report any unrecorded funds or assets, or false or artificial entries in the books and records of the Company if you become aware of them. If you learn of or suspect accounting fraud, report it immediately by contacting the Compliance Division or Corporate Audit.

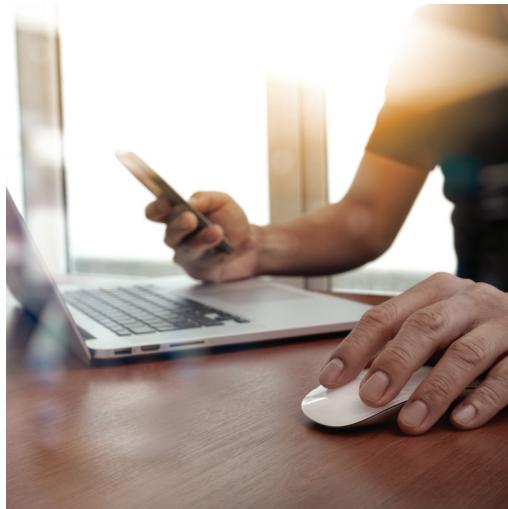
Confidential and Proprietary Information

The products, services, ideas, concepts and other information we create and collect on a daily basis are important proprietary assets for Pfizer. These include marketing plans, sales data, clinical and medical data, customer and colleague records, manufacturing techniques, pricing data and information about business development opportunities.

We all have an obligation to protect the sensitive information we encounter or are given access to during collaborations, business partnerships and from our prior employment.

It is important that we prevent inappropriate or unauthorized access to or disclosure of sensitive information.



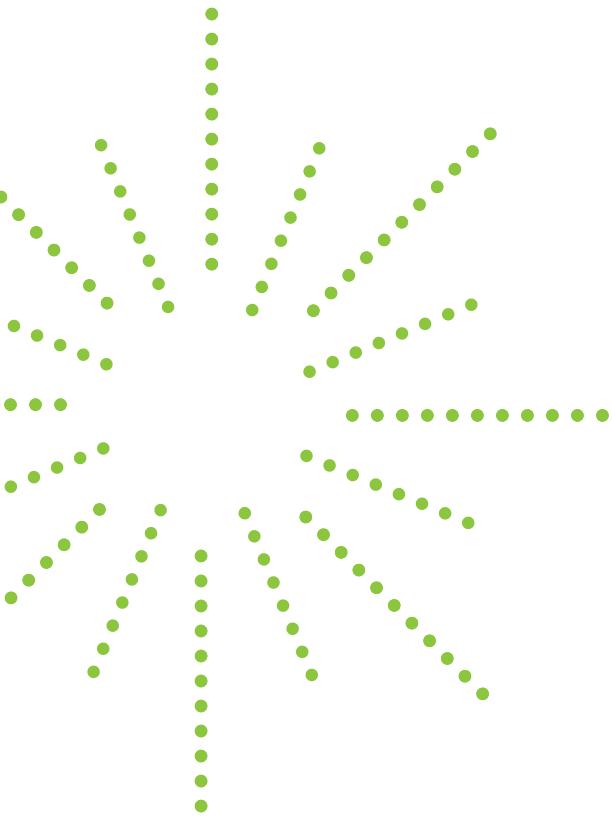


No Pfizer colleague may ever ask our colleagues, partners or vendors to divulge sensitive information they may have obtained through prior employment or current business relationships, unless such information is made available with the owner's consent or the information is publicly available.

Help protect Pfizer by following these principles:

- Be careful when using electronic means of storing and sending information.
- Don't provide confidential or proprietary information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreements. If in doubt, check with your manager or the Legal Division.
- Don't discuss confidential information in places where you can be overheard.
- Secure all confidential information when working in an open environment.
- Dispose of confidential or proprietary information properly.
- Beware of informal telephone or email requests from outsiders seeking information (commonly known as "phishing").

For more information on handling Pfizer's information, visit protect.pfizer.com.





Privacy of Personal Data

Preserving the privacy of personal data is critically important. Personal data is information that can directly or indirectly identify an individual such as name, contact information and health-related and genetic information. Colleagues, healthcare providers and many others entrust Pfizer with personal data. Research, pharmacovigilance and other business activities may also give Pfizer access to personal data.

Pfizer, its business partners and its agents are accountable for protecting personal data and for processing it only within the boundaries of applicable law and Pfizer policies and procedures.

Help protect the privacy of personal data, including personal health information, by following these principles:

- Comply with applicable laws and regulations of the jurisdictions in which personal data is collected and used.
- Collect and use the minimum amount of personal data necessary to achieve data business purposes, and keep it only as long as necessary to achieve those purposes.
- Share personal data only with individuals who have a legitimate need for it and will protect it properly.
- Follow Company guidelines for handling and destroying personal data.
- Report information incidents—if you learn of an inappropriate disclosure of personal data, immediately call the Pfizer Global Security Operations Center (GSOC) at 1-212-733-3900 or email GSOCwatchroom@pfizer.com and notify your manager.

See Corporate Policy 404 and Corporate Policy 411 on policysource.pfizer.com for more information on protecting the privacy of personal data and reporting information incidents.

Privacy Laws

Protecting the privacy and security of personal data is a growing global concern. Many countries are enacting or strengthening privacy laws that govern the use of personal data and holding violators accountable. For more information, visit [privacy\(pfizer\).com](http://privacy(pfizer).com).



What if I have to share personal data with third parties to meet business needs?

You must ensure that third parties can protect personal data and will use it only to provide services to Pfizer and that there is an appropriate contract in place that addresses protection of personal data. In some jurisdictions, other requirements may apply.





When should I dispose of my documents?

First, you must determine if a legal or tax audit hold applies. If so, all disposal activities must be suspended. Second, consult Pfizer's Enterprise Records Retention Schedule (ERRS) to determine how long the document should be retained. If there are no applicable legal or tax audit hold notices and the record has exceeded any retention time periods specified on the ERRS, you may dispose of it.

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 (ERRS) provides specifics on appropriate retention durations. You must refer to this schedule and the specific requirements of your business and location, as well as all applicable corporate policies and procedures, when determining how long your records should be preserved.

Requests by third parties (such as governmental regulatory agencies), lawsuits or other inquiries can create the need to retain records 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 notice, you must not alter or discard any relevant information. To understand which records must be preserved, refer to Pfizer's hold notices list or contact the Legal Division.

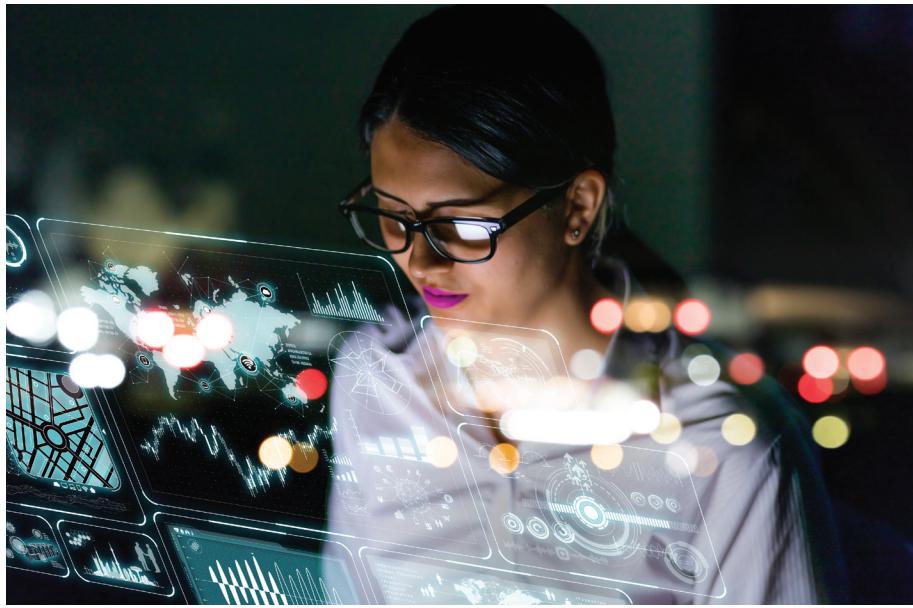
Pfizer's records management resources, including the ERRS and the hold notices list, can be found at erim.pfizer.com. For additional assistance, contact recordsmanagement@pfizer.com.

See Corporate Policy and Procedure 405 on policysource.pfizer.com for more information on records and information management.

Company Records



Company records are any recorded information captured in any medium that reflects circumstances, events, activities, transactions or results created or maintained as part of conducting business for Pfizer or that serves as evidence of fulfillment of a business or legal obligation of Pfizer. These records may be physical or electronic. Examples of media containing business records include paper documents (including handwritten notes), audio or video recordings and computer-based information such as email and computer files.



What do I need to do when working on a portable device in open-plan Pfizer offices or public spaces?

Even while working in a secured Pfizer facility, activate the system lock when leaving the device to prevent unauthorized use. Don't leave your portable device unattended in any location where security cannot reasonably be assured. In public settings, be careful to ensure that sensitive information cannot be viewed by others.

Acceptable Use of Information Systems

Pfizer supports information systems and networks to help colleagues work as effectively as possible. When used inappropriately, Pfizer data and systems may be exposed to substantial security, regulatory and reputational risk through unauthorized disclosure, modification and disruption.

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

- use only authorized software, devices and procedures;
- don't share your password except for a valid business reason (such as Pfizer technical support or customs or immigrations officials), after which it must be changed as soon as practical;
- share Pfizer business information only with authorized parties and only by using Pfizer-approved technologies; and
- don't use unauthorized devices or applications such as home computers and personally licensed mobile apps to transmit, store or work on Pfizer information or to conduct Pfizer business.

Pfizer allows the incidental personal use of Pfizer information systems, subject to certain restrictions. Except where mandated by law, you are not guaranteed personal privacy for information sent to, sent from or stored in Company systems. Subject to local law, all documents, including electronic communications, are subject to review at any time to address business or legal requirements.

See Corporate Policy 403 on policesource.pfizer.com for more information on acceptable use of Pfizer's information systems.

Prohibited Activities

You may not use Pfizer information systems or devices for communications or other materials that contain or promote anything that:

- violates harassment, discrimination or hostile workplace policies or laws;
- is defamatory, illegal, pornographic or obscene;
- is likely to interfere with work or result in the loss or damage of work or systems;
- solicits colleagues for any unauthorized purpose; or
- records communications without authorization.



Can I serve on a board of a local nonprofit that provides healthcare resources to those in need?

Maybe. Board service and other roles with external organizations may present conflicts of interest, depending on the circumstances. Potential conflicts may arise if the board role:

- conflicts with your Pfizer duties,
- harms Pfizer's reputation,
- involves the use of Pfizer's resources and/or confidential or proprietary information or
- involves soliciting funds from Pfizer.

Consult Corporate Policy 203 and any applicable local or divisional policies before you act to determine what approval is needed.



I want to invest in a Pfizer supplier. Is this a conflict of interest?

Maybe. It depends on factors such as your role, your influence on purchasing decisions, the amount of investment and Pfizer's importance as a customer. Before investing, disclose this to your manager to help determine the best solution.

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. However, many potential conflicts of interest can be resolved in a simple and mutually acceptable way.

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

Any potential conflict of interest must be disclosed to and approved by your manager. The Compliance or Legal Division must be consulted in certain situations. You must comply with Pfizer's Corporate Policy 203, as well as any local and divisional conflict of interest policies that apply to your role, which may be more restrictive than the corporate policy.

The following are examples of potential conflicts of interest:

Personal Investments or Transactions

Conflicts of interest may arise if you or a family member has a substantial financial interest in a Pfizer supplier, competitor or customer; has an interest in a transaction in which it is known that Pfizer is, or may be, interested; takes advantage of Pfizer's corporate opportunities for personal profit; or receives compensation from a Pfizer supplier, competitor or customer.

Personal Relationships

Pfizer discourages hiring close personal friends or relatives in the same business unit. A potential conflict arises if you hire, manage or otherwise do business with a close personal friend or relative or someone with whom you have an intimate relationship. The actions of family members and friends outside the workplace can also create a conflict if their actions cause you to lose your objectivity in the workplace.

Colleagues may date and develop relationships with other colleagues and contingent workers as long as the relationships do not interfere with or have a negative impact on their work, the work of others or the work environment. However, a manager may not date or have a romantic or sexual relationship with any colleague who is in his or her reporting line or whose compensation,



performance evaluation and/or career advancement the manager may influence because such circumstances would create a conflict of interest. Even a romantic relationship between a manager and someone outside his or her direct reporting line can create the appearance of a conflict of interest. Similarly, a manager may not date or have a romantic or sexual relationship with a contingent worker whom the manager sponsors or whose assignment the manager otherwise may influence. If a manager or colleague becomes involved in a relationship that may create a conflict of interest, he or she must inform his or her manager or Human Resources promptly so that the Company can evaluate the circumstances and take action (e.g., change assignments or reporting relationships) as needed to remove the conflict of interest.

Outside Business and Other Interests

A conflict of interest exists if your outside business or other interests can affect your objectivity, motivation or performance as a Pfizer colleague.

A second job or other affiliation with a Pfizer competitor is not allowed (other than in connection with your work for Pfizer, with appropriate approvals). A second job or other affiliation with a Pfizer customer, supplier or provider of goods or services is discouraged but may be allowed with proper approval. When outside employment is allowed, colleagues are still bound by all confidentiality agreements with Pfizer and all Pfizer policies and procedures relating to confidential, proprietary and/or material, non-public information.

Some activities—such as serving on a board of directors or speaking at a conference—may present a potential conflict of interest. Refer to Corporate Policy 203, as well as any local and divisional conflict of interest policies that apply to your role, for details.

Gifts, Entertainment and Other Items of Value

You and your immediate family may not give or accept gifts, services, perks, entertainment, discounts, loans or other items of more than modest value by local standards to or from those who are doing business or seeking to do business with the Company. Items of modest value are permitted only if they are not given or received on a regular or frequent basis and if they are not solicited by Pfizer colleagues. Refer to Corporate Policy 203 and any local and divisional conflict of interest policies that apply to your role for details, including monetary limits.

See Corporate Policy 203 on policysource.pfizer.com for more information on conflicts of interest.



My spouse owns a vendor Pfizer might use. I do not have any decision-making responsibilities in this area. Do I need to disclose this?

Yes. Any potential conflict, or even the appearance of a conflict, might damage your reputation or Pfizer's and must be disclosed to your manager to help determine the best solution.



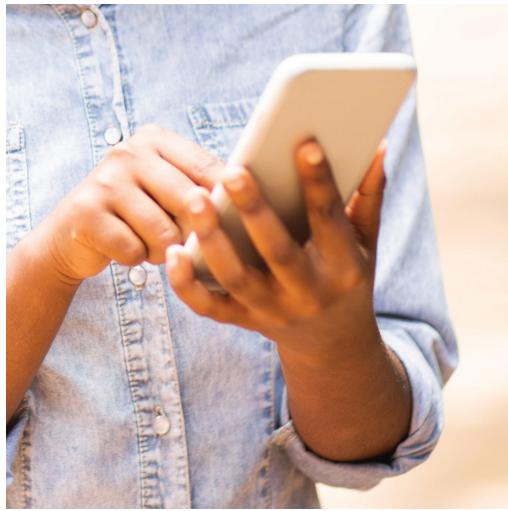
My brother, a contract employee for a supplier, does work for Pfizer. Is this a conflict of interest?

Maybe, depending on the roles you and your brother have. Because this is a potential conflict, you must disclose it to your manager. If appropriate, your manager will work with the Legal or Compliance Division to determine the best solution.



In my country, refusing a gift from a business associate could be an insult. What should I do when a gift over the value allowed is offered?

Consult with your manager or the Legal or Compliance Division. If the gift must be accepted to preserve the relationship or is impractical to return, it may be possible to accept it as Company property or donate it to charity. For example, food items could be placed in a central location for everyone to share, or a painting could be donated to a local museum.



Social Media

Social media refers to digital technologies and practices that enable people to create and share content, opinions, insights, experiences and perspectives. The hallmarks of social media are user-generated content and interaction.

When engaging in social media activities related to Pfizer, including both internal-facing and external-facing platforms, adhere to Pfizer policies and these general principles:

- Be transparent and make appropriate disclosures.
- Do not make unauthorized disclosures.
- Obtain necessary permissions before posting.
- Be truthful, accurate and respectful.
- Refer media inquiries to Global Media Relations.
- Report adverse events found on the Internet or in social media to the appropriate contact.
- Ask first, post later.

Pfizer's policies impose requirements on the creation and use of Pfizer-sponsored social media. You must consult the Legal Division when creating any Pfizer-sponsored social media.

All Pfizer-sponsored social media that discusses or relates to a Pfizer product requires prior approval. Specific requirements apply to the content of such posts, the types of media in which they may appear and, in some cases, review by regulatory authorities.

Personal posts on external social media that include more than a neutral, passing reference to Pfizer products are prohibited. Any personal posts referencing Pfizer's interests—which include Pfizer and its business, products, colleagues and former colleagues, policies, research, relationships and competitors—must include a disclaimer that mentions your relationship to Pfizer and explains that the statements or opinions expressed are your own and do not necessarily represent those of Pfizer.

See Corporate Policy 407 on policysource.pfizer.com for more information on social media.



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 or options) of a company when you are aware of “inside information”—material, non-public information—relating to the company. Securities laws and Pfizer policy prohibit you from using or disclosing any inside information that you may acquire during the course of your employment at Pfizer.

You may not use information gained through your employment with the Company before this information is known publicly to buy or sell the securities of Pfizer or any other company with which Pfizer has or may be considering a relationship (such as a customer, supplier, research partner or potential acquisition or collaboration candidate). Nor may you give inside information to anyone else so that they can trade. This restriction applies no matter where you live or where the receiver of the information lives. These restrictions apply to you, your spouse and minor children and anyone who lives in your household or is financially dependent on you.

Securities law violations are taken very seriously. Government agencies and stock exchanges are able to monitor trading activities through computerized records searches. Violations may result in significant civil and criminal penalties against companies and individuals.

See Corporate Policy 604 on policysource.pfizer.com for more information on the treatment of material, non-public information.

I am working with a joint venture partner, and I've become aware that our partner is on the verge of a major scientific breakthrough. Can I purchase some stock in our joint venture partner?

No. Neither you, your spouse, your minor children nor anyone who lives in your household or is financially dependent on you can purchase this stock until the first business day after the information you have is known to the public. Nor may you give inside information to anyone else so that they can trade.



Material Information

Material information is any information an investor might consider important in deciding whether to buy, sell or hold securities. Examples include financial results, possible mergers, important developments (e.g., clinical trial results, regulatory decisions) and significant changes in business direction.

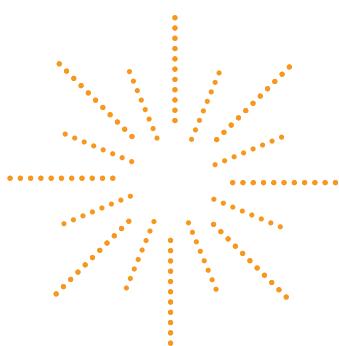
Financial results include information related to the Company’s quarterly earnings. Therefore, if you are involved in any way with the preparation or review of the Company’s quarterly earnings release materials, you would likely be deemed to be in possession of material, non-public information and should refrain from trading beginning with the receipt of any such information until the first trading day after the quarterly earnings release to which the information relates.

Information that is not material to Pfizer may be material to another company with which Pfizer has or is considering a relationship. Information is considered **non-public** until the first business day after it has been disclosed to the public. Examples of public disclosure include public filings with the US Securities and Exchange Commission, press releases and conference calls with analysts to which the public has been invited in advance.



I want to know what patient recruitment exclusion criteria a competitor is using in a clinical trial. That information is not public. Can I pose as a potential patient recruit, call the research site and ask questions?

No. Misrepresentation—not disclosing that you are a Pfizer colleague or posing as someone you are not—is an unethical way to gain access to a competitor's confidential information. Before you engage in any competitive intelligence primary field research, consult with the Legal Division or Competitive Intelligence to confirm that your strategy is legal and ethical. The Competitive Intelligence function can help you identify appropriate research opportunities.



Competitive Intelligence

In today's business environment, we have access to a great amount of information about other companies, their products and services, some of which is non-public.

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 competitive information but only through the selection and contracting process administered by Pfizer's Competitive Intelligence function.

Business information about other companies may 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.

See Corporate Policy 121 on policysource.pfizer.com for more information on the gathering, management and control of competitive intelligence.



Global Trade Control Laws

We are all responsible for complying with global trade control (GTC) laws, which are complex and may change quickly as governments adjust to new political and security issues.

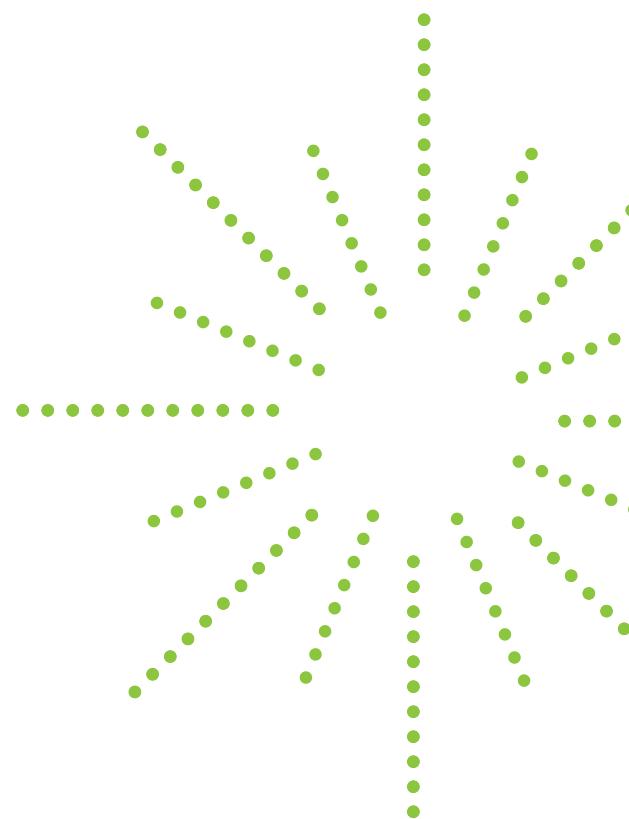
Violations of GTC laws can lead to significant fines and penalties for Pfizer and any individuals involved, as well as other business and supply chain issues.

Many markets, which may include regions or locations that span multiple countries, have laws that govern the import, export or transfer of certain products, items, software and technology, as well as the performance of some services. In addition, many GTC laws restrict Pfizer's investments, transactions, research and business activities with certain markets, entities or individuals.

All activities involving restricted parties or restricted markets must be reviewed by a Legal Division attorney. Some markets also support restrictive trade practices or boycotts against other markets or groups. There are special rules and requirements that deal with reporting and responding to these practices and boycotts.

Additional information regarding restricted parties and anti-boycott requirements, as well as a list of Restricted Markets and details regarding other GTC topics, are available on gtc.pfizer.com. Any questions or concerns about GTC laws should be directed to the Legal Division.

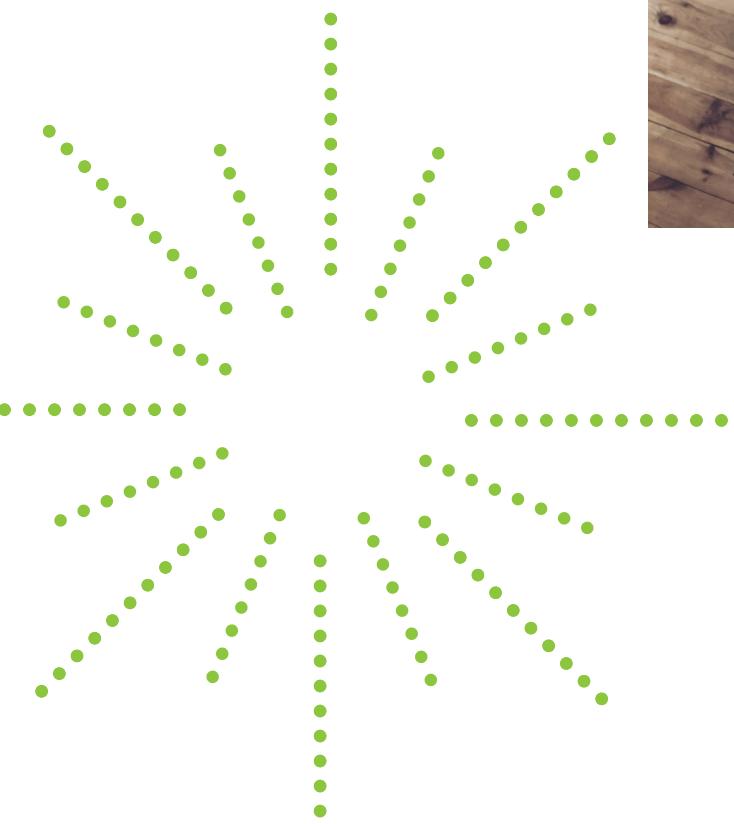
See Corporate Policy 206 on policesource.pfizer.com and visit gtc.pfizer.com for more information on GTC Laws.





I am bringing together a team of international colleagues to collaborate on vaccine research. Do GTC laws affect this work?

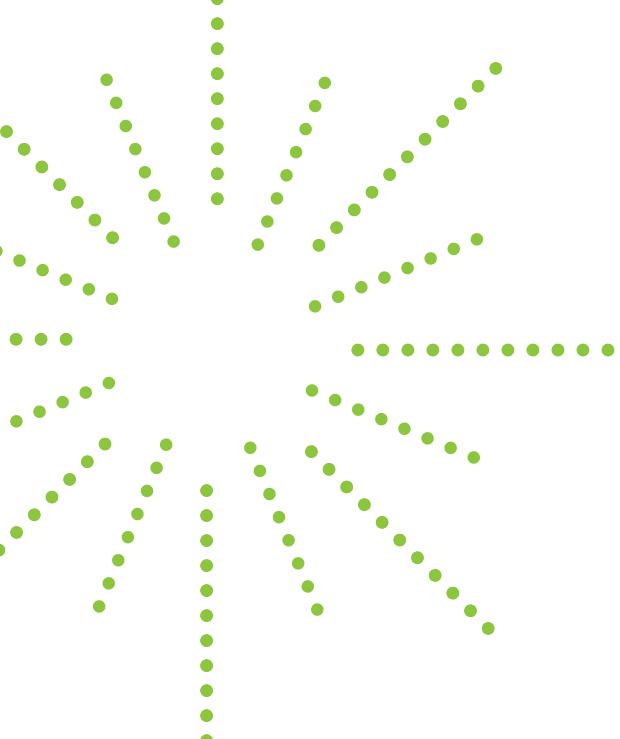
Yes, you must consider GTC laws before a non-US national is provided access to US-origin technology, regardless of where in the world the access will occur. This is the case even when the colleague is in the United States under a visa or work permit or on a short-term business trip. Consult gtc.pfizer.com or contact the Legal Division for more information.





Our Colleagues





Our Colleagues

Our Commitment

Pfizer is committed to treating our colleagues and job applicants with fairness and respect. We believe in cooperation, teamwork and trust, which contribute to a positive work environment. Hostility, harassment and retaliation are not tolerated. Our global policies prohibiting all forms of inappropriate behavior are intended to create a workplace that promotes a positive and productive environment.

Anti-Retaliation Policy

Retaliation against anyone who seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. If any individual, regardless of his or her role in Pfizer, retaliates against someone who has reported a concern, Pfizer will take appropriate action—even if no violation is ultimately confirmed. However, intentionally making a false report is a serious violation of Company policy that the Company will address accordingly.

If you believe that you or someone else may have been retaliated against for engaging in protected conduct, you should contact the Compliance Division or the Employee Relations Group in Human Resources.

Equal Employment Opportunity

It is the Company's policy to provide equal employment opportunity to all applicants and colleagues and to treat all applicants and colleagues without regard to personal characteristics such as race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by applicable law), presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws.

integrity is... strength



integrity is...strength

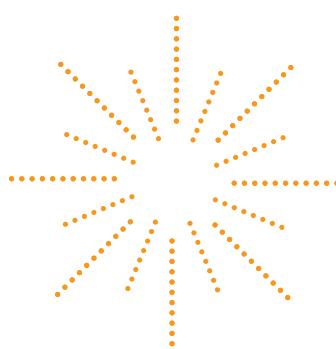
It is important to raise concerns, particularly when you are facing challenging decisions. Our Open Door and anti-retaliation policies help to protect colleagues who raise concerns.

All managers are responsible for ensuring compliance with Pfizer's Equal Opportunity Policy and applicable local workplace policies. Managers have a responsibility to act on and to report any potential discrimination, harassment, or violation of Pfizer's Equal Opportunity Policy of which they become aware.

Visit HR On Demand at hrondemand.pfizer.ehr.com or policysource.pfizer.com for Corporate Human Resources policies.

At-Will Employment

Unless otherwise agreed upon in writing (and subject to local legal requirements) each Pfizer colleague is employed by the Company on an at-will basis. 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 colleague with respect to continued employment can alter this relationship. Consult with the Legal Division or Human Resources if you have questions.





I know that sexual harassment is specifically prohibited by law in the United States, but what about other locations?

We all should have a work environment in which we are shown respect by our colleagues. Pfizer's policies on discrimination and harassment apply globally. In addition, you must follow applicable local laws in your area. Consult your local Human Resources representative if you are uncertain about whether certain conduct is consistent with an environment of dignity and respect. If you believe that you or someone else may have been subject to harassment, report it through any of the channels identified in our Open Door Policy.



Discrimination and Harassment

Pfizer promotes and values a work environment free of verbal or physical harassment. This includes any unwelcome comments or actions regarding race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by applicable law), presence of a mental or physical disability, veteran status or other characteristics protected by applicable laws. If you believe that you or someone else may have been subject to discrimination or harassment, you should report this to your manager. You may also contact the Employee Relations Group, Human Resources or the Compliance Division.

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 ability to work. Specifically, with respect to sexual harassment, the Company prohibits unwelcome sexual advances or requests for sexual favors; verbal or physical conduct of a sexual nature; and offensive comments, jokes, innuendos, gestures or other sexually oriented conduct.

Colleagues who engage in acts of harassment or discrimination are subject to corrective action that may include termination of employment. Managers are responsible for maintaining a work environment that is free of harassment and discrimination.

Pfizer is also committed to providing an environment that is free of retaliation. If you experience or are aware of any discrimination, harassment or retaliation, you may report it using any of the channels identified in our Open Door Policy.



My co-worker tells racially charged jokes that make me feel uncomfortable. What should I do?

Your co-worker should be made aware that these jokes are creating a negative work environment. In our straight talk environment, you are free to speak directly with your co-worker if you are comfortable doing so. Whether you communicate directly with the co-worker or not, you should report this to your manager, who will be expected to take appropriate action. You may also contact the Employee Relations Group, Human Resources or the Compliance Division.

If you reasonably believe that a colleague or anyone else doing work on behalf of the Company has violated or may violate a law or Pfizer policy, or is acting in a way that is unethical, including engaging in harassing, discriminatory or retaliatory conduct, you have a responsibility to report that information immediately to your manager, another manager, Human Resources or the Compliance or Legal Division using any of the many channels available for raising concerns. Whenever you are in doubt, it is best to raise your concern. Pfizer has Open Door, anti-retaliation and confidentiality policies to help protect you. Retaliation against anyone who seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited and will not be tolerated. You are responsible for raising concerns about risks as soon as you become aware of them. By raising concerns, you give management the opportunity to address potential problems and protect Pfizer, colleagues and the public.

Open Door Policy

Our Open Door Policy encourages colleagues to present ideas, ask questions and raise concerns.

While we hope you feel comfortable discussing any matter with your manager, there may be times when you prefer to address issues with others, including:

- the next higher level of management,
- your operating unit head,
- any other manager in the Company,
- Human Resources,
- the Legal Division or
- the Compliance Division.

All managers are responsible for supporting this policy by maintaining an “open door” for their direct reports and other colleagues who may reach out to them.

For more information on our Open Door Policy, see Corporate Policy 702 on policysource.pfizer.com



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

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 leave (depending on your location) to pursue treatment and rehabilitation or other forms of assistance. For more information, see Pfizer's Substance Abuse Prevention Policy.

Colleagues are advised that marijuana is illegal under federal law and, as such, all the prohibitions in Pfizer's Substance Abuse Prevention Policy concerning the use of illegal drugs apply to marijuana.



Substance Abuse

Substance abuse can pose serious health and safety hazards in the workplace. We are committed to achieving an environment free of substance abuse for the health and well-being of colleagues and for the benefit of the Company.

Pfizer's formal policy and guidelines are compassionate but firm. The use of illegal drugs and the misuse of alcohol and other substances, including over-the-counter or prescription drugs, are prohibited in the workplace. The workplace includes anywhere that a colleague is conducting Pfizer business, regardless of time or location.

Subject to local laws and practices, Pfizer may conduct pre-employment drug testing, and colleagues may be tested if they display unusual or erratic behavior such that there is a reasonable suspicion of substance abuse. In addition, where permitted by law, colleagues may be subject to additional testing, including unannounced testing on a random basis.

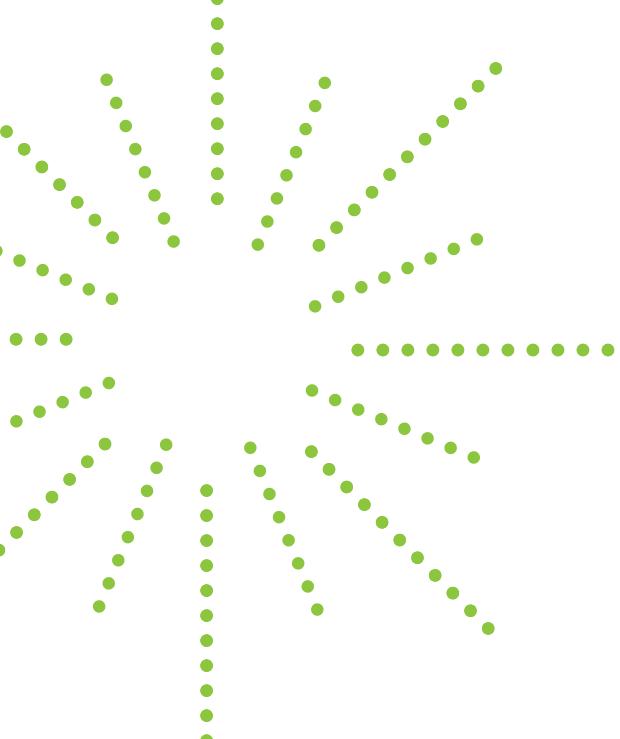
Visit HR On Demand at hrondemand.pfizer.ehr.com or policysource.pfizer.com for Corporate Human Resources policies.





Our Community and the Public





Our Community and the Public

Our Commitment

Pfizer is committed to participating actively in and improving the communities in which we do business. As a member of today's rapidly changing global community, we strive to adapt to the evolving needs of society and contribute to the overall health and wellness of our world. We work to protect the environment and the health and safety of those who work for and with us.

Doing Well by Doing Good: Corporate Responsibility

At Pfizer, we recognize that helping society benefits us all. It strengthens our company and helps fulfill our business purpose—to bring therapies to people that significantly improve their lives. We seek to improve the well-being of people around the world through our responsible business actions and through sustainable social investments designed to improve access to medicines and healthcare.

By partnering with select organizations, governments and foundations, we work to find solutions that will have a sustained and meaningful impact on global health. Our social investments include:

- **Global Health Fellows and Teams**, which place colleagues in short-term fellowships with international development organizations to bring about meaningful and systematic improvements in health service delivery;
- **International Trachoma Initiative (ITI)**, a public-private partnership dedicated to eliminating the world's leading cause of preventable blindness;
- **RxPathways**, which connects eligible patients in the United States to a range of assistance programs that offer insurance support, co-pay help and medicines for free or at a savings; and
- **Pfizer Foundation**,* which uses both grant and investment funding to improve access to healthcare in underserved communities around the world.

*The Pfizer Foundation is a charitable organization established by Pfizer Inc. It is a separate legal entity from Pfizer Inc. with distinct legal restrictions.

See Pfizer's Annual Report or visit www.pfizer.com/responsibility for more information on corporate responsibility.



Independent Charity Patient Assistance Programs

Pfizer believes all individuals deserve access to quality healthcare and medicines prescribed by their physicians. To that end, charitable contributions to Independent Charity Patient Assistance Programs (“ICPAPs”) can provide a means to help patients access their medicines by providing significant assistance for co-pay, deductible and/or premium obligations for prescriptions. Corporate Policy and Procedure 803 govern interactions with and charitable donations to ICPAPs for co-pay, deductible, and/or premium obligations, or for incidentals in connection with treatment. This policy places strict limits on colleagues’ interactions with, donations and allocations to, or data from or about ICPAPs. Pfizer’s Corporate Responsibility group has the sole responsibility for budgeting ICPAP donations and allocation across disease states for such charitable donations. Most Pfizer colleagues are restricted from playing a role in charitable donations to ICPAPs for co-pay assistance. There are also strict limitations on the use of data related to ICPAPs, either obtained directly from ICPAPs or indirectly through third parties.

Protecting the Environment and Health and Safety

Protecting the environment and the health and safety of our colleagues, contingent workers, visitors and the communities in which we operate is a business priority and is core to Pfizer’s Values. We are committed to:

- ensuring compliance with all applicable environmental, health and safety (EHS) laws and internal standards;
- continuous improvement of our EHS performance;
- understanding the EHS properties of our products throughout their life cycles;
- supporting programs to achieve Pfizer’s environmental sustainability public goals;
- selecting suppliers and business partners with consideration of their ability to run safe and environmentally responsible operations;
- educating, training and motivating colleagues to work in a safe, environmentally responsible manner; and
- fostering openness and dialogue on EHS matters with internal and external stakeholders and communicating risk, performance and progress.

integrity is...credibility

We are accountable for demonstrating to all our stakeholders that we embed integrity and the highest ethical standards into all that we do. This is essential to our credibility as a company that serves the needs of patients and communities around the world.





Division and Business Unit leaders within Pfizer are responsible for ensuring their people managers and functional areas have the direction and support (including provision of resources) to meet their EHS responsibilities.

Colleagues and contingent workers are responsible for:

- understanding and complying with applicable EHS requirements;
- reporting to their managers or local EHS function injuries and illnesses at work and any other issues that could impact the environment, health or safety;
- reporting concerns about potential non-compliance to their managers, to the local EHS function or through other reporting methods described in this *Blue Book*.

See Corporate Policy 113 on policysource.pfizer.com for more information on our commitment to the environment, health and safety; visit ehs.pfizer.com for Pfizer's EHS Standards.



Government Investigations: Non-Routine Government Requests for Information

Pfizer and our affiliates will cooperate with all government authorities in connection with requests for information. If you are contacted by any government authority (US or otherwise) with regard to a non-routine request for information at a Pfizer facility, at your home or otherwise, you must immediately notify a member of the Legal Division. The Government Litigation Group (within the Legal Division) also needs to be notified. Consult Corporate Procedure 602 and any local policies or procedures for details. The Legal Division will determine what information needs to be provided in each case. Although the Company and our colleagues may not appear to be the subject or target of an inquiry, non-routine requests may expose Pfizer or individual colleagues to civil or criminal liability.

In addition, physical searches and raids by government authorities, as well as non-routine regulatory inspections that result in “critical” adverse findings or formal warnings, are considered referable compliance issues (RCIs). The Compliance Division must be notified immediately of all RCIs.

See Corporate Procedure 602 on policesource.pfizer.com for more information on responding to requests for information or facility visits.





A reporter called me looking for some basic information about the Company. Can I answer her questions?

No. Even simple questions must be routed to Global Media Relations because you may not have all the relevant facts. Even if you provide accurate information, releasing it at the wrong time could interfere with the Company's plans. In addition, uncoordinated disclosure could pose problems under securities laws if the information released was material, non-public information.

Media, Analyst, Investor 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.

Only Global Media Relations and Investor Relations are authorized to answer questions from the media, financial analysts and investors. This includes formal and informal requests for information, whether made in person, over the phone, in writing or using any form of social media. Questions from the media, financial analysts and investors should be referred as follows:

- All media inquiries should be referred to the Global Media Relations Press Office at 1-212-733-1226.
- For analyst and investor inquiries, please contact Investor Relations at 1-212-733-2668.
- For investor inquiries related to Corporate Governance and related topics, please direct your inquiry to <https://investors.pfizer.com/corporate-governance/contact-our-directors/default.aspx>.

You can also refer those who request information to what is available on [www\(pfizer.com](http://www(pfizer.com).

See Corporate Policy 604 on policysource.pfizer.com for more information on the treatment of material, non-public information.

Political Activity

While Pfizer encourages colleagues 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. Colleagues may not conduct personal political activity on Company time or use Company property or resources for this purpose.

See Corporate Procedures 802a and 802b on policysource.pfizer.com for information on political contributions.



Index and Contacts



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Contacts

Corporate Policies and Procedures
policysource.pfizer.com

Compliance Division
corporate.compliance@pfizer.com
1-212-733-3026
1-917-464-7736 (secure fax)
235 East 42nd Street, New York, NY 10017

Compliance Helpline
pfizer.ethicspoint.com
1-866-866-7349

Compliance Division Website
integrity.pfizer.com

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 previously 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 (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.

