

# **Pfizer UK Ltd:**

# **Methodology note for**

# **HCP/ORDM/HCO disclosure**

# **2025**

**Data year: 2025**

**Year of publication: 2026**

## **Introduction - Pfizer's Commitment to Transparency Reporting**

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

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

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

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

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# 1. Definitions

## 1.1. Recipients:

**HCP:** any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product and whose primary practice, principal professional address or place of incorporation is in Europe. The definition of HCPs includes: (i) any official or employee of a government, agency or other organisation (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and (ii) any employee of a Member Company whose primary occupation is that of a practising HCP

**ORDM:** The term 'other relevant decision makers' particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

**HCO:** any legal person/entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services

**Covered Recipient** – Any reportable HCP, ORDM or HCO

**PO/PAG** – Patient Organisation/Patient Advocacy Group. A non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and whose business address, place of incorporation or primary place of operation is in Europe

**Retired HCPs/ORDMs:** ToVs of Retired HCPs/ORDMs are published

**Deceased HCPs/ORDMs:** ToVs of Deceased HCPs/ORDMs are published

## 1.2. Kind of ToVs:

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

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

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

### **Transfer of Value Categories**

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

EFPIA category	EFPIA subcategory	Example Activities
Donations and Grants (HCOs only)	n/a	<ul style="list-style-type: none"> <li>• Charitable contributions</li> <li>• Business donations</li> <li>• Educational grants (e.g. fellowships, courses provided by an HCO where Pfizer does not select the individual HCPs participating)</li> <li>• Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants</li> </ul>
Collaborative Working	n/a	<ul style="list-style-type: none"> <li>• initiatives which either enhance patient care or are for the benefit of patients</li> <li>• initiatives which benefit the National Health Service (NHS) and, as a minimum, maintain patient care</li> </ul>
Contribution to Cost of Events	Sponsorship agreements (HCOs only)	<ul style="list-style-type: none"> <li>• Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program</li> <li>• Funding an event in return for a display booth</li> <li>• Funding an event in exchange for advertising space</li> <li>• Other advertisement space (in paper, electronic or other format)</li> <li>• Satellite symposia at a congress</li> <li>• Any other activity qualified as “Corporate Sponsorship” according to Pfizer’s Anti-Corruption Policies</li> <li>• Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as “Corporate Sponsorship” according Pfizer’s Anti-Corruption Policies</li> <li>• For contributions provided to Events through Professional Conference Organisers(PCOs): TOVs through PCOs are reported as follows: <ul style="list-style-type: none"> <li>- either in the name of benefitting HCO</li> <li>- or in the name of Recipient PCO</li> </ul> </li> </ul>
	Registration fees	<ul style="list-style-type: none"> <li>• Registration fees paid for the HCP/HCO to attend events</li> </ul>

	Travel & Accommodation	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation)</li> <li>• Accommodation</li> <li>• Travel Visa</li> </ul>
Fee for services and consultancy	Fees	<ul style="list-style-type: none"> <li>• Speaker engagements</li> <li>• Advisory Boards*</li> <li>• Study-related engagements</li> <li>• Preceptorships</li> <li>• Post-marketing surveillance studies</li> <li>• Non-Interventional Studies that are retrospective in nature</li> <li>• Medical writing</li> <li>• Data analysis</li> <li>• Development of education materials</li> <li>• General consulting / advising</li> <li>• Speaker training if linked to a speaker engagement</li> <li>• Any other activity which qualifies as General Consultancy according to Pfizer's Anti-Corruption Policies</li> </ul>
	Related expenses	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> <li>• Travel Visa</li> </ul>
Research and Development Transfers of Value	n/a	<ul style="list-style-type: none"> <li>• Clinical Trials</li> <li>• Data Monitoring Committees related to studies</li> <li>• Non-Interventional Studies that are prospective in nature</li> <li>• Investigators Initiated Research (IIR)</li> <li>• Investigator Sponsored Research (ISR)</li> <li>• Clinical &amp; Research Collaboration</li> </ul>

\*excluding Data Monitoring Committees related to studies which are disclosed in aggregate under R&D

## 2. Disclosure's Scope

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

**2.2. Company concerned:** This report includes ToVs processed by Pfizer United Kingdom legal entities and includes ToVs from all Pfizer legal entities.

**2.3. Excluded ToVs:** no reportable ToVs as defined by the Code (28.2) have been excluded.

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

**2.5. Direct ToVs:** the clearing date is the reportable date

**2.6. Indirect ToVs:** the clearing date is the reportable date

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

**2.8. ToVs in case of partial attendances or cancellation and refund:**

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

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

**2.10. R&D:** see section 1.2, Transfer of Value Categories

**2.11. Voluntary disclosure:** n/a

### 3. Specific considerations

**3.1. Country unique identifier:** n/a

**3.2. Self-incorporated HCP:** are considered HCOs unless the organisation consists of only one HCP or ORD, then it would be considered an HCP/ORD (as per 2024 ABPI Code clause 1.8.)

**3.3. Multi-year agreements:** Where contracts are valid for more than one year, each individual TOV is captured and disclosed in the reportable disclosure period.

**3.4. Country specificities:**

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

**3.5. Quality checks:**

- In compliance with our global SOP

## 4. Data protection legal basis

**4.1. Consent collection:** Pfizer discloses the ToVs based on legitimate interest in the UK.

**4.2. Legitimate interests:** In all agreements with HCPs/ORDMs Pfizer informs the individuals that their ToVs will be disclosed. In all cases, the EEA Pfizer HCP Privacy Notice is provided to the individuals and is available in those websites under our control where the TOV are disclosed.

Pfizer has conducted a balancing test as follows:

Purpose:

- Pfizer has a legitimate interest in meeting our obligations under the ABPI Code.
- Our approach aligns with the ABPI's position on transparency and disclosure, the NHS England guidance on managing conflicts of interest in the NHS, and public statements about transparency issued by DOH and MHRA.
- Individual disclosure reinforces Pfizer's commitment to transparency in relation to our financial relationships with healthcare professionals, which we believe is critical to the future of medical innovation and patient care.
- Transparency helps to build a greater trust between the pharmaceutical industry and the medical community.
- It also reduces public scepticism about healthcare industry practices and helps to foster trust with patients.

Necessity:

- Aggregate data does not provide the level of granularity that the transparency initiative seeks to achieve.

Expectations of/impact on individuals:

- HCPs have signed an agreement which states that data relating to transfers of value made to them will be published.
- Our agreements with HCPs and our websites contain copies or links to our privacy notice which states that transfers of value will be disclosed.
- The nature and amount of the personal data that is disclosed is reasonable and proportionate to achieve the purpose of transparency.
- The drive for greater transparency between pharma industry and HCPs is well publicised, and there is a reasonable expectation amongst HCPs that information relating to transfers of value will be disclosed.

On balance, Pfizer considers that the interests of Pfizer, the medical community and society in general are pursued through disclosure, and these interests override the rights of the data subjects.

HCPs can object to their data being processed/disclosed where we rely on legitimate interest. When Pfizer receives an objection from an HCP/ORDM, Pfizer will conduct an individualised balancing test considering the specific circumstances the individual shares. Based on the outcome of the re-balancing the ToVs may remain individually disclosed or may be published in the aggregate section.

## 5. Form of disclosure

5.1. Date of publication: 30 June 2026

5.2. Disclosure platform: Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

5.3. Disclosure language: English

## 6. Disclosure financial data

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

6.2. **Value Added Tax (VAT):** Treatment of VAT depends on the TOV:

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

6.3. **Calculation rules:** The value of the employee time is based on an hourly rate of £45 (in Benefit in Kind donations)

## 7. Additional information

n/a