

PFIZER PHARMA GMBH & PFIZER MANUFACTURING DEUTSCHLAND GMBH

Guidance & privacy notice for the complaint's procedure under the Supply Chain Due Diligence Act and the Whistleblower Protection Act

Preliminary remark

Compliance with the law, fulfillment of human rights and environmental due diligence obligations, fair play in competition and compliance with internal Group guidelines and social standards is a top priority for Pfizer Deutschland¹ (hereinafter "**Pfizer**").

Violations can have serious consequences for the company, employees, suppliers, Pfizer's business partners and other third parties and must therefore be recognized at an early stage to initiate appropriate countermeasures and avert possible damage.

For this reason, persons can report misconduct within the company or in the supply chain - anonymously if they wish. Pfizer has established various internal reporting channels for this purpose to comply with both the requirements of the German Supply Chain Due Diligence Act (hereinafter "**LkSG**") and the requirements of the German Whistleblower Protection Act (hereinafter "**HinSchG**").

Who can report?

All employees and external persons can be reporters (hereinafter "**Reporters**").

What kind of complaints and reports can be submitted?

Complaints and reports (hereinafter "**Reports**") about possible violations of laws and/or regulations, e.g. violations of fair play in competition and violations of internal Group guidelines and social standards of Pfizer Inc., including human rights or environmental risks or violations that are imminent or have already occurred as a result of Pfizer's business activities in its own business area or along the supply chain (hereinafter referred to as "Violations") can be reported.

In particular, Violations in the following areas can be reported:

- Antitrust or fair trading, destruction of business records, espionage or sabotage, falsification of financial records, gifts, bribes and kickbacks, misrepresentation of information, money laundering and terrorist financing, trading on inside information, public procurement, product safety and compliance, and transport safety, public health (including patients' rights), consumer protection, animal health and welfare, protection of privacy, data protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and state aid rules), and
- Human rights, occupational health and safety and the environment (including along the supply chain).

To whom to report to?

Pfizer offers all potential Reporters the following internal reporting channels. All channels are of equal value, i.e., all Reports are treated equally, regardless of the channel through which they are submitted or received.

¹ Pfizer Germany comprises all German group companies of Pfizer, Inc., USA, in particular Pfizer Deutschland GmbH, Pfizer Manufacturing Deutschland GmbH and Pfizer Pharma GmbH.

Web reporting tool Compliance Helpline

The Compliance Helpline is a reporting service provided by the third-party provider NAVEX on behalf of Pfizer Inc. (66 Hudson Boulevard East, New York, NY 10001 USA, corporate.compliance@pfizer.com, +1-212-733-3026). You can also submit the Report anonymously.

To do so, follow the following link

<https://secure.ethicspoint.eu/domain/media/de/gui/101152/index.html>. The electronic web reporting tool will guide you through the complaint process. The input mask is available in German and English and in a further 35 languages.

Telephone compliance helpline

The Compliance Helpline is a telephone hotline of Pfizer Inc. that can be used to report Violations in German or English; it can be reached at 0800 - 180 -0761.

By e-mail

You can also submit your Report by e-mail to Pfizer's compliance department (compliance-bedenken@pfizer.de).

Personal

If you would like to submit your Report in person, please make an appointment with the compliance department (compliance-bedenken@pfizer.de). If you agree, it is also possible to have a conversation via video or audio transmission.

Employees can also contact their local People Experience representative (for People Experience related matters) or their local contact in the compliance department (for all other matters) by e-mail or telephone.

We encourage all Reporters to identify themselves by name when making a Report, as knowing your identity may make it easier for us to investigate suspected Violations of laws or company policies or procedures.

Pfizer encourages reporting Violations to Pfizer in the first instance, as this enables any issues to be resolved promptly and effectively.

All Reporters also have the right to report Violations to the competent German authorities provided for the HinSchG.

Who are the competent authorities for Reporters?

Bundesamt für Justiz (Federal Office of Justice)

Reporters can submit their report electronically, in writing, by telephone or in person to the Federal Office of Justice. It is also possible to report anonymously.

The link to the electronic reporting system as well as the electronic form and further information can be found at

https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html.

You can contact the Federal Office of Justice in writing (in German or English) as follows:

Bundesamt für Justiz
Externe Meldestelle des Bundes
53094 Bonn

You can reach the Federal Office of Justice by telephone (in German or English) from Monday to Thursday from 9.00 a.m. to 3.00 p.m. and on Friday from 9.00 a.m. to 1.00 p.m. on +49 228 99 410-6644.

You can also visit the Federal Office of Justice in person. Please make an appointment in writing or by telephone (Monday to Thursday from 9.00 a.m. to 3.00 p.m. and on Friday from 9.00 a.m. to 1.00 p.m.).

Bundeskartellamt

Reporters can report violations of competition law to the Bundeskartellamt electronically, in writing, by telephone or in person. It is also possible to report anonymously.

The link to the electronic reporting system as well as the electronic form and further information can be found at <https://www.bkms-system.net/bkwebanon/report/channels?id=bkarta&language=ger>.

The external reporting office at the Bundeskartellamt can be reached by telephone as follows
Monday to Thursday from 9.00 a.m. to 3.00 p.m.

Friday from 9.00 a.m. to 2.00 p.m.

We recommend that you call with a suppressed telephone number if you prefer anonymity.

The telephone number is: 0228 9499 5980.

e-mail: Externe-Meldestelle@bundeskartellamt.bund.de

In person (in German or English)

You can also speak to the competent persons in the Bundeskartellamt in person. Please make an appointment in writing or by telephone (at the times stated above).

With your consent, the meeting can also take place via video and audio transmission.

You can also contact the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht [hereinafter "BAFIN"]) for violations of national and European regulations that fall within BAFIN's area of responsibility; further details can be found at https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html.

What happens after I made a Report to Pfizer?

Within seven days after you have made the Report, you will receive an acknowledgement of receipt.

You will be informed of the department responsible, which will follow up on your Report. The designated department will provide you with feedback on the processing of your Report. They may also ask you for additional information and clarification without there being any obligation on you to provide this.

If your Report to local departments concerns a significant potential, suspected or actual Violation of applicable law or Pfizer company policy (hereinafter "Referable Compliance Issue"), the Report will be immediately escalated to the Compliance Department for follow-up. If it is not such a Referable Compliance Issue, the matter will be referred to the appropriate internal function (e.g., Human Resources/People Experience, Global Security or the relevant local departments) for follow-up.

In any case, you will be informed which department is responsible for following up on your Report and your confidentiality will be protected as far as possible and in accordance with the applicable laws.

The processing time is highly case-dependent and can therefore take anywhere from a few days to several months. However, we endeavor to complete the investigation promptly.

We will keep you informed of the progress of the investigation and the actions taken following the outcome of the investigation. We will endeavor to provide you with feedback on the actions envisaged or taken following the Report within three months of acknowledgement of receipt.

As part of the investigation, Pfizer will endeavor to inform any person involved in a report of the allegations made against him or her within a reasonable period. The identity of the Reporter will be protected to the best of our ability, and concerned persons have the right to respond to the information you provided in your Report. Please note that the information you provide may lead to decisions affecting individuals at Pfizer and other third parties involved in the incident. We therefore ask that you only provide information that is accurate to the best of your knowledge. Knowingly providing false or misleading information may result in disciplinary action or even civil or criminal liability. In addition, any report should be limited to facts that are relevant to the report and the subsequent investigation.

No retaliation

Retaliation against individuals who seek advice, raise concerns or report misconduct, or against intermediaries, individuals or entities associated with the Reporter, is strictly prohibited. If someone retaliates against a person who has truthfully reported a Violation, Pfizer will take appropriate action - even if it is later determined that the person originally reported the matter falsely. If you believe that you or any other person involved has been retaliated against, you should contact the Compliance Department (compliance-bedenken@pfizer.de).

Protection of confidentiality

If you make a report locally, your identity and any identifying information will only be disclosed to authorized personnel responsible for receiving or following up on your Report, unless you give your express consent, or this is required by EU or national law in the context of an official investigation or legal proceedings.

The authorized persons responsible for following up on your report may be the compliance department or another relevant Pfizer function (e.g., Human Resources/People Experience, Global Security). They may seek assistance from external consultants and/or other functions within Pfizer or assign specific tasks to them for follow-up, which will be subject to the same confidentiality obligations. The persons entrusted with the implementation of the procedure are independent in the performance of their tasks and are not bound by instructions.

As part of following up on your Report, the compliance department may also need to notify members of the HR department/People Experience or Pfizer executives of any Violations identified to determine any disciplinary action, in which case your identity and any identifying information may be disclosed as necessary.

Your personal data

The local reporting procedure is provided by Pfizer Pharma GmbH and Pfizer Manufacturing Deutschland GmbH as the companies responsible for your personal data.

For these purposes, the data controller is:

- Pfizer Pharma GmbH, Friedrichstraße 110, 10117 Berlin and
- Pfizer Manufacturing Deutschland GmbH, Friedrichstraße 110, 10117 Berlin.

You can contact our Data Protection Officer (see DPO.Pfizer.com).

Purpose of the processing of personal data

The purpose of processing personal data in connection with local reporting is to ensure compliance with applicable international and local laws and internal policies.

We collect and process your personal data, which you provide to us via your Report, for the following purposes:

- Checking the plausibility of your Report and the data it contains to avoid Violations,
- Investigation of suspected Violations of laws and regulations, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperate with Pfizer's affiliates with respect to their obligations to investigate Violations,
- Defense of third-party claims and preparation of lawsuits against third parties,
- Development of our local reporting and investigation procedures.

Collection and processing of information and personal data

Pfizer may collect and process the following information in the course of handling your Report: Your name, title, position and contact information, unless the report is anonymous; the name and other information of individuals named in your Report; the name and position of your supervisors; a description of the conduct at issue in your Report, including the date and location, and other pertinent information; and any questions you ask Pfizer. Pfizer may also seek information from other individuals as part of the subsequent investigation. In certain circumstances, we may also process sensitive data such as health data or trade union membership if you provide it to us and/or if it is relevant to the purpose of the investigation.

The information you provide will be treated confidentially in accordance with applicable laws.

Pfizer may use the above information either because we need to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (hereinafter "**GDPR**")), or because we have a legitimate interest in investigating the report you have submitted to us (Article 6(1)(f) GDPR), or because you are required to report certain incidents under your employment contract (Article 6(1)(b) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to local reporting (Article 22 GDPR).

Use, storage, and disclosure of information

Pfizer will protect the confidentiality and security of your personal information and will only use your personal information to process the Report to those persons responsible for receiving reports or following up on them, and to persons who assist them in carrying out these tasks. If relevant information is passed on to other persons, we will ask for your prior written consent. The information we receive in this context, as well as any personal data you provide to us, will be stored in a Pfizer database with restricted access.

We may disclose your personal data to our affiliates when they have a need to know, including to countries that have different data protection laws than the country where you work, including to other Pfizer affiliates or to suppliers when necessary to investigate the Report. We may transfer your personal data to the compliance department of Pfizer Inc. Note that some of the non-EEA countries are not recognized by the European Commission as providing an adequate level of data protection in

accordance with EEA standards. Countries that provide an adequate level of protection can be found here: [Adequacy decisions \(europa.eu\)](https://eudatascene.eu/adequacy-decisions).

We have taken appropriate measures, such as standard contractual clauses adopted by the European Commission, to enable the transfer and protection of your personal data to countries that are not recognized by the European Commission as providing an adequate level of data protection. You can obtain a copy of these measures by contacting us as indicated in the "Your rights" section or by accessing them at the link https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en.

Pfizer may also be required to transfer some or all your personal data to law enforcement or other authorities in the countries concerned.

Information relating to a Report will be archived or deleted based on the following criteria: when the investigation is complete, and no further action is required; when the time for all relevant litigation has expired; and when our record retention obligations related to investigations have expired. For further details, please refer to the applicable company record retention policy. Three years after your case is closed, the records of the Report will be deleted. Records may be retained for longer to comply with legal requirements where this is necessary and proportionate, in particular because of the requirements of the LkSG.

Your rights

Subject to the conditions set out in the GDPR, you have the right of access to your personal data (Article 15 GDPR), the right to rectification of your personal data (Article 16 GDPR), the right to erasure of your personal data (Article 17 GDPR), the right to restriction of processing of your personal data (Article 18 GDPR) and the right to object to the processing of your personal data in certain circumstances (Article 21 GDPR).

If you wish to exercise a right under the GDPR, you can contact your Data Protection Officer (see DPO.Pfizer.com). We will respond to your request in accordance with applicable law.

You also have the right to lodge a complaint with the competent data protection authority for Germany at any time.

Berlin, Germany	
Berlin Commissioner for Data Protection for Data Protection and Freedom of Information Alt-Moabit 59-61 10555 Berlin	
Phone:	+49 30 13889-0
Email:	mailbox@datenschutz-berlin.de

If you have any questions or concerns regarding the local handling of reports, please contact the local Compliance Department (compliance-bedenken@pfizer.de) or the Compliance Department in New York at +1-212-733-3026, corporate.compliance@pfizer.com or 235 East 42nd Street, New York, NY 10017 USA.