

**PFIZER HEALTH AB**  
**LOCAL COMPLIANCE REPORTING**  
**GUIDANCE & PRIVACY NOTICE**

There are several ways in which you can report a concern. In addition to Pfizer's Compliance Helpline (<https://pfizer.ethicspoint.com>) or contacting Pfizer's Compliance Division directly, you may also report a concern locally by contacting your local People Experience contact (for People Experience -related matters) or your local Compliance Division contact (for all other matters) ("**Local Reporting**").

Pfizer encourages concerns to be raised internally in the first instance, either through the Helpline or through Local Reporting, as this enables any issues to be resolved promptly and effectively.

While you are encouraged to report through one of Pfizer's reporting channels, you also have the right to report concerns about violations of EU and local laws externally to the competent authorities.

The following authorities are competent to receive reports within their respective areas of supervision: Arbetsmiljöverket, Boverket, Elsäkerhetsverket, Ekobrottsmyndigheten, Fastighetsmäklarinspektionen, Finansinspektionen, Folkhälsomyndigheten, Fortifikationsverket, Försvarmakten, Försvarets materielverk, Försvarets radioanstalt, Förvarsunderrättelsesdomstolen, Havs- och vattenmyndigheten, Integritetsskyddsmyndigheten, Inspektionen för strategiska produkter, Inspektionen för vård och omsorg, Kemikalieinspektionen, Konsumentverket, Konkurrensverket, Livsmedelsverket, Läkemedelsverket, Länsstyrelserna, Myndigheten för samhällsskydd och beredskap, Naturvårdsverket, Post- och telestyrelsen, Regeringskansliet, Revisorsinspektionen, Skatteverket, Skogsstyrelsen, Spelinspektionen, Statens energimyndighet, Statens inspektion för försvarsunderrättelseverksamheten, Statens jordbruksverk, Styrelsen för ackreditering och teknisk kontroll, Strålsäkerhetsmyndigheten, Säkerhetspolisen, Totalförsvarets forskningsinstitut, Totalförsvarets plikt- och prövningsverk and Transportstyrelsen.

Arbetsmiljöverket is the Swedish authority that have been designated as the competent supervisory authority for questions regarding whistleblowing. This means, among other things, that Arbetsmiljöverket shall handle reports that are not covered by any other authority's area of responsibility.

**Who can use the Local Reporting channel?**

The Local Reporting channel is available to:

- Employees, volunteers and trainees;
- Self-employed persons who provide services to Pfizer Health AB,
- Shareholders and persons belonging to Pfizer Health AB's administrative, management or supervisory body, as well as;
- Former employees,

- Persons who have not yet started to work for Pfizer Health AB, in relation to information on breaches acquired during the recruitment process or other pre-contractual negotiations;
- Persons who work for contractors, subcontractors and suppliers.

### **What is the procedure for Local Reporting?**

You can contact your local People Experience contact (for People Experience -related matters) or your local Compliance Division contact (for all other matters) by email or by phone. If you prefer, you can ask for a physical meeting to report your concern. You may also contact your People Experience contact or your Compliance Division contact using the following email address: [wbd.sweden@pfizer.com](mailto:wbd.sweden@pfizer.com). You are encouraged to identify yourself when making a report, because knowing your identity may make it easier for us to investigate alleged violations of law or company policy or procedure. However, you may also report anonymously.

You may report concerns arising in a work-related context about:

- financial and business integrity issues, such as those relating to accounting, internal accounting controls, auditing matters, bribery and corruption, banking and financial crime;
- violations of EU law including public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules).
- violations of local law; and
- breaches of internal company policies, procedures and code of conducts.

### **What happens after I have made a report?**

Within seven days, you will receive an acknowledgment of receipt.

The local contact point will designate the appropriate department to follow-up on your report. This designated department will provide you with feedback on the follow-up given to your report. They may also ask you for additional information and clarifications, without there being any obligation on you to provide this.

If the report concerns a Referable Compliance Issue (RCI), meaning a significant potential, suspected, or actual violation of applicable law or Company policy, as a matter of Pfizer company policy, it must immediately be escalated to the Compliance Division for follow-up. If the case is not an RCI, the matter will be referred to the appropriate function (e.g. People Experience, Global Security, or relevant local departments) for follow-up.

In either case, you would be informed of the department designated to follow up on your report, and your confidentiality would be protected to the fullest extent possible and in accordance with applicable laws.

We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation. We aim to provide feedback within three months from the acknowledgement of receipt on the action envisaged or taken as follow-up to the report.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will not disclose your identity unless you consent. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

### **No Retaliation**

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

### **Protection of Confidentiality**

When you report locally, your identity and any identifying information will not be disclosed to anyone beyond the authorised staff members competent to receive or follow up on your report, unless you give your explicit consent or if this required by EU or national law in the context of an investigation by an authority or court proceedings.

The authorised persons competent to follow up on your report may be the Compliance Division or another relevant function of Pfizer (e.g. People Experience, Global Security). These may seek assistance from, or designate some follow-up tasks to, external advisers and/or other functions within Pfizer, in which case these would be subject to the same confidentiality obligations.

As part of the follow-up to your report, the Compliance Division may also need to notify members of People Experience or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action, in which case your identity and any identifying information may be shared.

## **Your personal data**

Local Reporting is provided by Pfizer Health AB (“**Pfizer**”, “**we**”, or “**us**”) as the company responsible for your personal data.

For these purposes, the data controller is: **Pfizer Health AB, Vetenskapsvägen 10, 191 90 Sollentuna, Sweden. Email to [info.sweden@pfizer.com](mailto:info.sweden@pfizer.com).**

You may reach out to our Data Protection Officer (see [DPO.Pfizer.com](http://DPO.Pfizer.com)).

## **Purpose of Processing of Personal Data**

The purpose of the processing of personal data in relation to Local Reporting is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject of high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through Local Reporting for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above;
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Local Reporting and investigation processes.

## **Collection and Processing of Information and Personal Data**

Pfizer may collect and process the following information in the context of Local Reporting: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the Local Reporting.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1) (c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1) (f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1) (b) GDPR).

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

### **Information Use, Retention, and Data Transfer**

Pfizer will protect the confidentiality and security of your personal data, and will only use your personal data for the provision of Local Reporting. Information we receive in this context and any personal data that you provide to us will be stored in a Pfizer database with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report. We may, in particular, transfer your personal data to the Compliance Department of Pfizer Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of data protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission and Binding Corporate Rules, to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting your local Pfizer Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](mailto:DPO.Pfizer.com).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via Local Reporting will be archived or deleted based on the following criteria: when the investigation has been closed and no further action is needed; when the time period for any relevant litigation has lapsed; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail.

### **Your Rights**

Subject to the conditions laid down in the GDPR, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), and

the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact

Pfizer Health AB at [info.sweden@pfizer.com](mailto:info.sweden@pfizer.com), or by using the following address:

Pfizer, Vetenskapsvägen 10, 191 90 Sollentuna

or our Data Protection Officer (see [DPO.Pfizer.com](http://DPO.Pfizer.com)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with the competent data protection authority for Sweden, the Swedish Authority for Privacy Protection.

If you have any questions or concerns related to the Local Reporting , please contact local People Experience contact (for People Experience-related matters) or your local Compliance Division contact (for all other matters), by email, [wbd.sweden@pfizer.com](mailto:wbd.sweden@pfizer.com), or the Compliance Division at +1-212-733-3026, [corporate.compliance@pfizer.com](mailto:corporate.compliance@pfizer.com) or 235 East 42nd Street, New York, NY 10017 USA.