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PURPOSE

Pfizer Inc ("Pfizer" or "the Company") seeks to establish clear procedures relating to the engagement and use of non-Pfizer personnel to perform various services for Pfizer ("contingent workers"), as distinguished from Pfizer employees.

SCOPE

This procedure applies to all U.S. locations of the Company, including Puerto Rico.


IMPLEMENTATION

The implementation of this procedure will be in two phases – new and existing engagements. From January 1, 2008 (Day One), all new engagements of contingent workers must comply with this procedure. For all existing contingent workers, regardless of how long they have already been engaged at Pfizer, their length of service will be reset to zero from Day One.

DEFINITION OF CONTINGENT WORKERS

A "contingent worker" is any non-employee engaged to provide services to the Company, including, without limitation:

- (i) agency temporaries - hourly workers engaged through temporary agencies such as Manpower and ProcureStaff);
- (ii) independent contractors - self employed workers who do not have agency representation e.g. 1099's.
- (iii) professional service consultants - external consulting firms who provide professional expert advice such as KPMG and Accenture.
- iv) outsourced service providers (e.g., catering, building maintenance);
- (v) leased personnel - Pfizer ex-employees who have been sold as part of a divestiture (e.g. PCH to J&J) who are assisting to transition operations to the new organization.

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APPROPRIATE USE OF CONTINGENT WORKERS

Contingent workers should be used to provide services for which Pfizer does not otherwise employ resources (e.g., catering, landscaping, maintenance) or when a short-term need for additional resources or special skills exists and the hiring of additional employees is not warranted (e.g., a special project or a short-term increase in work load).

ENGAGING CONTINGENT WORKERS


Contingent workers should be engaged only for appropriate business purposes. Short-term business needs should be filled via internal resources wherever possible (e.g., if a Pfizer Administrative Assistant is out for a short period of time, the group should not use a temporary worker).

If a division needs to engage a contingent worker, the contingent worker should be engaged only through a preferred supplier using the Ariba purchasing system, with approval from a divisional/budget approver and a Procurement representative. Pfizer should not directly engage or contract with a contingent worker to provide services to the Company.

Pfizer employees should not discuss compensation, pay rate or benefits information with contingent workers. Worldwide Procurement has pre-negotiated bill rates directly with preferred staffing agencies. Generally, the contingent worker’s employer provides benefits to contingent workers.

Pfizer employees should not interview candidates for temporary assignments. Our preferred suppliers screen and select candidates for temporary assignments. Exceptions may be made for certain critical roles, long term or project work, where it may be necessary for Pfizer to pre-screen a potential contingent worker. Nonetheless, in all cases, the preferred supplier should communicate the decision to the prospective contingent worker.

Contingent workers are not included in the Pfizer new employee orientation. However, certain technical, compliance and/or safety training may be required as part of the on-boarding process for certain workers. Please refer to your local EH&S representative for specific details. Preferred suppliers are required to ensure that their employees who provide services to Pfizer are, and remain, drug-free and comply with Pfizer's drug-free workplace standards. The attached Exhibit includes the Pfizer standards for background verification.

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All contingent workers are to be registered in the appropriate electronic security on-boarding tool (e.g. GIDM).

LENGTH OF ENGAGEMENT

While a site or division's specific need may require flexibility regarding the length of a contingent worker's engagement with Pfizer, in no event should an engagement extend beyond (i) a 12 month continuous period or (ii) if a project-based assignment, the period of time necessary to complete the project for which Pfizer engaged the contingent worker. Each division, within these guidelines, should determine the appropriate length of a contingent worker's engagement based upon specific business needs.


TREATMENT OF CONTINGENT WORKERS WHILE ON PFIZER PREMISES

Contingent workers are not employees of Pfizer. They are, nevertheless, to be treated in accordance with the Pfizer values and are expected to comply with all Pfizer policies which apply to guests on Pfizer premises. Preferred suppliers will be provided with the relevant Pfizer policies to distribute to the Contingent Workers. The attached Exhibit includes guidelines for the treatment of contingent workers while on Pfizer premises.

DISCONTINUING SERVICE OF CONTINGENT WORKERS

Pfizer employees should never take direct action with respect to termination of a contingent worker's employment. If a contingent worker's performance or conduct warrants the discontinuance of his or her services, contact the on-site agency representative, site Procurement, or site Human Resources.

If you have any questions regarding this procedure or its implementation, contact your divisional Human Resources representative, Worldwide Procurement or Pfizer's Employment Law Group.

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Attachment A

Pfizer’s Drug Testing and Background Check Requirements for Contingent Workers and Suppliers, Including Criminal and MVR Record Checks, FDA Debarment Database and DEA Controlled Substance Requirements
(Updated 1/15/2008)

I. Overview


Pre-assignment drug testing, background, criminal and debarment checks are mandatory for all new contingent workers, contractors and suppliers who perform work for Pfizer on a regular or routine basis at a Pfizer site or Pfizer work location, including, but not limited to, periods of time requiring a Pfizer security badge beyond that required for periodic “visitors” (hereinafter referred to as “Contingent Workers.”) Conducting tests and screening is the responsibility of the individual supplier, and is subject to periodic audit by Pfizer.

Post-assignment drug testing and background check obligations are also specified herein. The occurrence of any substance abuse, disqualifying offenses or debarments during a Pfizer assignment must also be handled in accordance with these guidelines.

These requirements are current as of their date of issuance. Pfizer reserves the right to amend or modify these requirements at any time and will provide ample notice and an opportunity for discussion prior to implementation of any new requirements. Pfizer also reserves the right to require additional security checks, qualifications and background clearances for any individuals whose duties will require access to any areas deemed by Pfizer to be "restricted" or "special access" areas on any Pfizer site.

Drug testing shall be in accordance with the following:

- Supplier must conduct pre-assignment drug tests of all Contingent Workers, to the full extent permitted by state or local law.
- Pre-assignment drug testing must be successfully completed prior to the Contingent Worker’s commencement date at Pfizer.
- Contingent workers who fail their drug screen must not be assigned to any Pfizer facility or account and may reapply for an assignment after six months from the date of the failed drug screen.
- Drug testing is to be conducted by a NIDA Approved laboratory.
- The cost of the tests will be absorbed by the Supplier.

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- If any Contingent Worker exhibits observable evidence of substance abuse or impairment during the course of any assignment, Pfizer reserves the right to remove them from the workplace and require the supplier to conduct an immediate drug and alcohol screen, to the full extent permitted by federal, state or local law. Results of the screen (an indication of “pass” or “fail”) must be provided to Pfizer before the Contingent Worker is permitted to return to any Pfizer facility.
- A drug test will be considered valid for 1 (one) year or the length of the Contingent Worker’s assignment, whichever is longer. Any break in assignment greater than 3 months will necessitate a new drug screen.
- Employment of the contingent worker by a new supplier, regardless of the time interval between assignments, will necessitate a new drug screen by the new supplier.

Background Checks shall be conducted in accordance with the following:

- Supplier must conduct background checks related to the employment, education, FDA debarment status and any required licenses or certifications (such as MVR and DEA) of any Contingent Worker provided to Pfizer to the full extent permitted by federal, state or local law. Detailed requirements for the background check are provided below.
- Background checks must be successfully completed prior to the Contingent Worker’s commencement date at Pfizer.
- The cost of the background check is to be absorbed by the Supplier.
- The background check will be considered valid for 1 (one) year or the length of the contractor assignment, whichever is longer. However, any break in assignment greater than 3 months will necessitate a new background check.
- Employment of the contingent worker by a new supplier, regardless of the time interval between assignments, will necessitate a new background check by the new supplier.

Certification of Compliance

- Prior to a Contingent Worker’s commencement of engagement at Pfizer, the Supplier is required to obtain a completed drug screen and background check and accept or decline a worker for any Pfizer assignment per the attached requirements.
- Prior to a Contingent Worker’s commencement of engagement at Pfizer, the supplier must submit a statement indicating that the employee has passed all requirements of the Pfizer Background Check Requirements including; Drug screen, Criminal and MVR Record Checks, FDA Debarment Database and DEA Controlled Substance Requirements (if required). This Statement should be forwarded to the Pfizer Site Security Office or Pfizer representative responsible for security at the business location.

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- Pfizer reserves the right to audit results and compliance with the above requirements.

II. Summary of Scope of Background Check

- ✓ Pre-Screening for Current Unlawful Substance Abuse
- ✓ Verification of Personal Identity, Employment Record and Educational History
- ✓ Criminal Record Check (residences, employment locations and names during the past seven years). Combination of local, state and county checks.
- ✓ Motor Vehicle Records (“MVR”) (only for subjects driving company-owned vehicles or driving on company business as a primary component of job)
- ✓ Debarment (Includes FDA/ORA Debarment, OIG and Excluded Parties)
- ✓ DEA Checks for Assignments involving Controlled Substances


III. Specific Areas of Inquiry, Analysis and Decision

A. SUBSTANCE ABUSE SCREENING

Pfizer maintains a substance abuse-free workplace. All suppliers, especially those whose services are regularly delivered through onsite workers, are required to ensure that their employees, independent contractors and consultants, and all individuals whom they engage to work on Pfizer premises and/or Pfizer projects under their control and/or supervision, are and remain drug-free and compliant with Pfizer's drug-free workplace standards. Suppliers will be required to demonstrate that individuals, who are designated to work on Pfizer premises and/or on Pfizer projects, have passed drug tests, as follows.

Testing Methods

To the full extent permitted by federal, state and/or local law pre-hire drug screening is to be conducted. All urine samples will be screened using an immunoassay technique and all presumptive positive tests will be confirmed using gas chromatography/mass spectrometry (GC/MS) or another equally sensitive and reliable methodology. All confirmatory tests will be performed by a laboratory certified by the federal Substance Abuse and Mental Health Services Administration (SAMHSA) for federal workplace testing. Pfizer currently tests for cannabinoids (marijuana), cocaine metabolites, amphetamines (including methamphetamines and some prescription stimulants), opiates (including codeine, morphine, heroin, methadone, meperidine, hydrocodone,

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hydromorphone, and oxycodone), phencyclidine (PCP), barbiturates, and benzodiazepines (including Valium and Xanax)

B. EMPLOYMENT AND EDUCATIONAL HISTORY VERIFICATION

Pfizer requires verification of personal identity, employment and educational history for all Contingent Workers. Prior to assigning any individual to a Pfizer site placement or project suppliers are required to verify that the employment and educational histories of Contingent Workers are accurate and acceptable. Inaccurate information and/or unexplained gaps must be reviewed by the supplier. Contingent Workers who fail to fully and accurately disclose information shall be disqualified from any Pfizer assignment. Employment history and reasons for leaving (including, but not limited to Pfizer assignments) must be verified and reviewed for the greater of either the last 7 years or the last 3 positions held. Contingent Workers terminated from prior employment for misconduct, violations of policy or law, behavioral issues or other unacceptable reasons shall be disqualified from any Pfizer assignment. Verification of educational history should include ALL qualifications, regardless of date undertaken or job relevance.

C. CRIMINAL and MOTOR VEHICLE REQUIREMENTS


Pfizer strives to maintain safe and secure working environments for all colleagues, customers, business partners, visitors and guests. All suppliers are required to verify criminal and MVR records to ensure that Contingent Workers do not pose a safety or security risk to Pfizer sites, property or personnel.

Prior to assigning any individual to a Pfizer placement or project the supplier shall inquire as to whether the individual had been convicted of any criminal offense or offenses. The inquiry shall be followed by a detailed criminal records check. The failure to fully disclose any conviction prior to the criminal records check shall disqualify the individual from any Pfizer assignment.

If during the course of an assignment a disqualifying offense is committed by a Contingent Worker, the Supplier must take the actions specified in this policy.

Disqualifying Offenses

Certain criminal offenses that substantially relate to all anticipated Pfizer-related project duties pose risks to Pfizer’s efforts to maintain safe and secure workplaces and business operations. These offenses are identified below as disqualifying offenses. The other listed

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offenses require further review by the agency to determine based on the relevant facts and applicable laws whether to assign the individual to a Pfizer project or placement. When conducting all such reviews, the agency is required to apply substantial deference to Pfizer’s interests in maintaining a safe, violence-free and substance abuse-free working environment. All unresolved determination or questionable circumstances are to be considered disqualifying offenses.

Felonies

Except as restricted by applicable federal, state and local laws, all felony convictions, arrests (where prosecution is pending) and deferred adjudication, within the last seven (7) years shall be disqualifying offenses.

Misdemeanors/Violations/Other Offenses


Except as restricted by applicable federal, state and local laws, all convictions for misdemeanors, Violations and Other Offenses within a period of five (5) years shall be reviewed to determine the underlying facts, followed by further agency review to determine whether a Pfizer placement would be appropriate. Factors include whether the offense substantially relates to the anticipated Pfizer-related project duties and/or poses risks to Pfizer’s efforts to maintain safe and secure workplaces and business operations.

Pending Charges

Except as restricted by applicable federal, state and local laws, an individual charged with a offense (Felony and/or Misdemeanor) should be interviewed to determine the underlying facts, followed by further agency review to determine whether a Pfizer placement would be appropriate during pendency of the charge[s]. Decisions should be based on underlying facts obtained from the candidate and other available sources, and not the mere pendency of a criminal charge. Factors include whether the offense substantially relates to the anticipated Pfizer-related project duties and/or poses risks to Pfizer’s efforts to maintain safe and secure workplaces and business operations. An individual exonerated of the charge[s] may be considered for placement.

Outstanding Warrants

An individual with an outstanding arrest warrant may not be placed with Pfizer until the warrant has been dismissed or adjudicated.

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Motor Vehicle Record (MVR)

MVR check is required prior to the placement of any individual in a position, the principal duties of which require the operation of a motor vehicle. When multiple licenses are involved, all of the applicant's licenses will be evaluated together in order to reach final hiring decision. Violations not listed below shall be reviewed to determine the underlying facts, followed by further agency review to determine whether a Pfizer placement would be appropriate.


Disqualifying MVR Criteria:

- ✓ Current suspended, cancelled, expired, revoked license, no license, permit only, and ID card only
- ✓ Single DWI/DUI within the past year, 2 or more DWI/DUI no time limit
- ✓ 3 or more moving violations (do not count accidents) within the past 3 years.
Careless and Reckless Driving will be considered moving violations
- ✓ Accumulation of suspensions over 1 year in length within the last 3 years
- ✓ More than 2 accidents with indication of fault within last 3 years
- ✓ More than 3 accidents, no time limit

D. DEBARMENT LISTS

Pfizer will not provide access to our facilities for any individual listed on certain debarment lists maintained by various government agencies. As a result, all contracting agencies are required to ensure that their employees, independent contractors, and consultants, and all individuals who work on Pfizer premises and/or Pfizer projects under their control and/or supervision, are checked against the following debarment/exclusion lists and any whose name appears must be disqualified from any Pfizer assignment. (The exclusion lists are available on the official government websites maintained by each agency.)

In the event that an existing Contingent worker is added to a debarment list during an assignment, the contract agency must remove the worker from all Pfizer assignments, whether conducted at a Pfizer site or elsewhere.


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1. Federal Department of Health and Human Services List of Excluded Individuals/Entities
2. General Services Administration Excluded Parties List System (EPLS)
3. Federal Drug Administration Debarment List

E. DEA CONTROLLED SUBSTANCES CHECKS

Under CFR 1301.90 Pfizer is required to obtain additional information on all individuals who will have access to controlled substances, as defined by the Drug Enforcement Administration. Contracting agencies must therefore ask the following questions of any individual considered for assignment to a Pfizer facility where they will be in contact with controlled substances. As set forth in Section III C above, an affirmative response to question 1 will preclude a candidate from assuming any assignment at Pfizer. An affirmative response to questions 2-5 will not necessarily preclude a candidate from working in a non-controlled substances area, but that information should be used by the supplier as part of the overall evaluation of the individual's qualifications for a Pfizer assignment.

1. Within the past five years, have you been convicted of a felony, or within the past two years, of any misdemeanor or are you presently formally charged with committing a criminal offense? (Do not include any traffic violations, juvenile offenses or military convictions, except by general court martial.) If yes, furnish details of convictions, offense, location, date and sentence.
2. In the past three years, have you ever knowingly used any narcotics, amphetamines or barbiturates, other than those prescribed to you by a physician? If yes, furnish details.
3. Have you at any time had an application for registration with the DEA denied for cause? If so, please describe the application and date of such denial.
4. Have you at any time had an application for registration with the DEA revoked for cause? If so, please describe the application and date of revocation.
5. Have you at any time surrendered a DEA registration for cause? If so, please describe the registration and the date of such surrendering.

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In conducting this DEA controlled substances check, suppliers should comply with the following guidelines:


- a. Obtain an authorization, in writing, that allows inquiries to be made of courts and law enforcement agencies for possible pending charges or convictions. The authorization must be executed by any contingent worker who is seeking to work in an area where access to controlled substances clearly exists.
- b. The person must be advised that any false information or omission of information will jeopardize his or her position with respect to the assignment.
- c. The application for employment should inform the person that information furnished or recovered as a result of any inquiry will not necessarily preclude assignment, but will be considered as part of an overall evaluation of the person's qualifications.
- d. The supplier must commit to maintain fair employment practices, the protection of the person's right of privacy, and the assurance that the results of such inquiries will be treated by the supplier in confidence and will be explained to the contingent worker.

IV. Retention of Records and Audit

The contracting agency must maintain records demonstrating its compliance with these background check requirements for each individual placed with Pfizer. Pfizer reserves the right to audit the contracting agency's compliance and the contracting agency will provide these records to Pfizer upon request. In the event Pfizer becomes aware that the agency failed to abide by the terms set forth herein, Pfizer reserves the right to remove and deny access to any individual who has not been screened as outlined above.


V. Compliance with Applicable Laws and Indemnification

The contracting agency will implement these background check requirements in a manner that complies with all relevant federal, state and local laws. The contracting agency agrees to indemnify and hold Pfizer harmless for all claims, damages, losses and liabilities (including claims or demands made by its employees, agents, consultants, independent contractors, and applicants) as a result of the contracting agency's compliance or noncompliance with the foregoing requirements.

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VI. Falsification or Omission


The falsification or omission of any information provided by an employee, independent contractor, or consultant shall preclude the agency from placing the individual on any Pfizer assignment.

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Attachment B

**GUIDELINES FOR TREATMENT OF
CONTINGENT WORKERS WHILE ON PFIZER PREMISES**

- Contingent workers are not eligible for any global or divisional recognition programs, e.g. Achievement Award, Individual or Team Award. Any monetary recognition, if approved, must come directly from the contingent worker’s employer/agency, not Pfizer.
- Contingent workers are not eligible to participate in any of Pfizer’s employee benefit plans (e.g., Pfizer Savings Plan, Pfizer medical plan) and are not eligible for benefits provided under Pfizer’s policies (e.g., Pfizer vacation, paid time off). Refer the contingent worker to his/her employer to address any benefits-related questions.
- Do not relay any performance-related feedback (e.g., attendance, tardiness, inappropriate behavior) to contingent workers. Do not conduct performance evaluations of contingent workers, attempt to discuss or resolve performance or employment-related issues directly with contingent workers or provide references for contingent workers. Communicate any concerns about a contingent worker’s provision of services to the agency onsite representative, or in their absence, to the contingent worker’s agency / employer. Any contingent worker’s inappropriate behavior should be additionally reported to Pfizer Human Resources.
- Contingent workers’ business expenses (e.g., travel) must be pre-approved by Pfizer pursuant to the Travel Guidelines for Contingent Workers (**link to be inserted**). Direct all approved expenses to the contingent worker’s agency for reimbursement. Do not reimburse a contingent worker’s business expense through XMS or any other Pfizer system.
- Do not allow a contingent worker to use Pfizer titles, to sign documents on behalf of Pfizer or to obtain or use Pfizer business cards.
- Contact Pfizer Worldwide Procurement or Human Resources before responding to any contingent workers’ inquiries regarding full-time employment. Do not discuss specific

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employment opportunities or the potential of becoming a Pfizer employee with contingent workers or on-site agency representatives. Do not direct contingent workers to any Pfizer job posting sites to pursue particular vacancies or opportunities.

- Consult Human Resources before considering a former Pfizer employee as a possible contingent worker.
- Ensure all contingent workers have signed confidentiality and non-disclosure agreements and do not grant access to company confidential information unless such access is essential for contingent worker to perform his/her assignment.
- Instruct contingent workers to wear contractor badge at all times and to return his/her badge after the assignment has ended.
- Pfizer does not maintain employee records for contingent workers. The contingent worker's employer will retain all employment-related records. However, Pfizer may keep training and certification records for contingent workers as required by law. Contingent workers' records should be kept separate from employee records.
- If a contingent worker raises an issue under Pfizer's Open Door Policy, contact Human Resources, Global Diversity or the Employment Law Group immediately, who will notify the agency.
- If a contingent worker is injured on the job, notify Employee Health & Safety (EH&S) immediately. EH&S will follow their normal protocol for providing medical attention and reporting the injury to the agency. Contingent workers should be instructed to report any injuries to their employer.
- Careful consideration should be given to whether contingent workers should attend business meetings. Invite contingent workers only to meetings that directly pertain to their assignment or the service they provide. Examples could include project update meetings and events.
- Careful consideration should be given whether to permit contingent workers to attend non-work related functions, play on a company-sponsored sports team, or participate in company-sponsored events that are not open to visitors, guests or the general public.