

## **VOLUNTARY ADMISSION BY PFIZER**

**Support provided to health professionals to attend a conference**

### **CASE SUMMARY**

This case was in relation to a voluntary admission from Pfizer. Pfizer identified through its audit activities that four UK health professionals who were supported to attend an international congress in Asia in 2024 had received business class return flight tickets.

The outcome under the 2021 Code was:

<b>Breach of Clause 5.1</b>	<b>Failing to maintain high standards</b>
<b>Breach of Clause 8.2</b>	<b>Failing to certify events/meetings involving travel outside the UK</b>
<b>Breach of Clause 10.1</b>	<b>Providing inappropriate hospitality</b>
<b>No Breach of Clause 2</b>	<b>Requirement that activities or materials must not bring discredit upon, or reduce confidence in, the pharmaceutical industry</b>

**This summary is not intended to be read in isolation.  
For full details, please see the full case report below.**

### **FULL CASE REPORT**

A voluntary admission was received from Pfizer Limited.

As Paragraph 5.14 of the Constitution and Procedure required the Chief Executive to treat a voluntary admission as a complaint, the matter was taken up with Pfizer.

### **VOLUNTARY ADMISSION**

The voluntary admission wording is reproduced below:

“Pfizer is writing to inform you that we have identified breaches of the Code associated with support provided by Pfizer to four Healthcare Professionals (HCPs) to attend the [named international congress] which took place in Bangkok in June 2024.

We have identified through our routine audit activities that the incorrect class of flight was provided to four HCPs and as such was not consistent with the requirements of Clause 10.1 of the Code. We have also identified that all aspects of the support provided to attend the congress were not certified as required by Clause 8.2 of the Code. We have confirmed that these were isolated issues relating to a single event.

Prior to 2024, Pfizer's UK policy was to only provide support to HCPs for congress registration fees. During 2023 Pfizer UK took the decision to expand the support that we provide to include accommodation, and overseas flights. From 1st January 2024, subject to certain criteria, Pfizer's policy has allowed the purchase of congress registration passes, hotel accommodation and flights through our Meeting Planning Agency (MPA).

Pfizer's [named therapy area] marketing team provided support to four HCPs to attend [named international congress] in Bangkok in June 2024. The support was arranged by the MPA and was composed of:

**Registration passes:**

- 1 x Clinician registration: [cost provided] on demand access
- 2 x Associate Clinician registration: [cost provided]
- 1 x Nurse non-member registration: [cost provided]

**Hotel accommodation:**

3 HCPs received 6 nights accommodation in the [named hotel], a 4 Star business style hotel conveniently located near to the [named congress centre].

Due to lack of room availability at the first hotel, 1 HCP received 6 nights accommodation in the [second named hotel] a similar 4.5 star business style hotel also located near to the [named congress centre].

**Return flights:**

All four HCPs received business class return flight tickets between London Heathrow and Bangkok and Pfizer acknowledges a breach of clause 10.1 of the Code in this regard.

The team started the process in autumn 2023 under Pfizer's previous policy where support was limited to provision of congress registration passes only. The support for congress registration fees up to the value of [cost provided], was certified by a final country signatory on 14th December 2023.

In quarter one 2024, the new policy and process was briefed to each marketing team planning to provide support to HCPs to attend medical and scientific congresses. Our compliance resource centre 'eQuip' was also updated with a new process flow and 'Q&A' section to support colleagues with the new approach. The [named therapy area] marketing manager proceeded to include a request for accommodation and flights in their brief to the MPA but failed to arrange for the additional elements of support to be certified and we therefore acknowledge a breach of clause 8.2 of the Code.

The MPA agent responsible for the bookings is no longer an employee of the MPA and so we have not been able to ascertain why the business class flights were offered. We do understand that seat availability on direct flights was very limited during the period of the congress and the MPA supervisor believes that this may have caused the agent

to propose the business class flights. However, we are not able to determine the root cause of why the agent ignored the class of travel restrictions detailed in the Pfizer policy to which they were instructed to work.

We have reviewed all other international flight bookings made for UK HCPs since 1st January 2024 for delegate attendance at both international congresses as well as Pfizer organised meetings. All flight bookings are fully consistent with the requirements of the Code.

The errors made in relation to the support provided for four HCPs to attend [named congress] 2024 in Bangkok are an isolated incident caused by an MPA employee's failure to work in alignment with Pfizer's policy as instructed, and lack of appropriate oversight and policy adherence by an individual Pfizer colleague. We believe that the measures that Pfizer took to brief teams and update the compliance resource centre to reflect the new policy and process combined with the identification of this issue through our routine audit activities, demonstrates that Pfizer has maintained the high standards expected of our industry. We acknowledge that on this occasion one of our colleagues failed to maintain high standards in the discharge of their duties resulting in a breach of clause 5.2 of the Code."

When writing to Pfizer, the PMCPA asked it to consider the requirements of Clauses 8.2, 10.1, 5.1, 5.2 and 2 of the 2021 Code.

## **PFIZER'S RESPONSE**

The response from Pfizer is reproduced below:

"Thank you for your letter dated 28th July concerning Pfizer's voluntary admission of breaches of the Code.

Please find below and attached the requested information to support your assessment of how this matter should be processed.

**1) Are your Meeting Planning Agency (MPA) agents trained in the Code and trained on your new policies relating to the provision of support to health professionals to attend congresses. Specifically, was the agent responsible for the errors in this case trained on these matters?**

- Yes, Pfizer's MPA agents are trained on the relevant elements of Pfizer's policies and the Code and are instructed to work to these requirements.
- Pfizer's corporate requirements related to provision of support for Healthcare Professionals (HCPs) to attend meetings and congresses are set out in the '*Meetings and Site Visits*' section of Pfizer's corporate policy '*My Anti-corruption Policy and Procedure*' (MAPP).
- The UK specific Code requirements and restrictions that must be considered in addition to Pfizer's Corporate Policy are set out in our '*UK Country Annex*'. The table on page 20 of the *UK Country Annex* sets out the restrictions related to

class of travel.

Class of travel		
	Is Next Higher Class above economy (i.e., 'Business Class') allowed for International Flights?	Is there any restriction for the Class for Train Travel?
HCP-GO Non-HCP – GO *	If flight time is longer than six hours, Premium Economy or similar is permitted for delegates; delegates may arrange an upgrade themselves at their own expense.  [Information about consultancy services]	[Information about train travel]

- At the time of the policy update the MPA was overseen by a Pfizer [named role]. This role was responsible for overseeing the MPA's activities and communicating local compliance requirements and polices to the MPA.
- The MPA works to the policy requirements of *MAPP*, the *UK Country Annex* and Code when arranging HCP travel, accommodation and congress registration passes on behalf of Pfizer UK. The MPA has confirmed that their agents were instructed to work to the above class of travel restrictions in 2024 and for many years prior to this.
- On joining the Pfizer account team, new MPA agents are taken through *MAPP* and the *UK Country Annex* including the relevant Code requirements, by their line manager ([job title provided]) and team refresher sessions are scheduled by the line manager at regular intervals.
- On 15th January 2024 a meeting was held between the [list of Pfizer Compliance staff and MPF staff provided]

The purpose of this meeting was for Pfizer to brief the MPA [agent's line manager] on the additional elements of support that Pfizer's polices, subject to relevant approvals, now permitted to be provided for HCPs to attend congresses. The MPA [agent's line manager] was then responsible for briefing the MPA agents on the change. The line manager of the MPA [agent's line manager] has confirmed that this action was completed.

- The expansion of support elements provided to HCPs to attend congresses did not involve a change to the travel restrictions that the MPA was required to work to. The MPA was already booking flights and accommodation for UK HCPs attending international Pfizer organised meetings as delegates, which was managed under the same class of travel restrictions. The current MPA team

has confirmed that the flight class restrictions applicable to delegate attendance were well known within the MPA Pfizer account team.

- Please note that the MPA agent that booked the business class flights and MPA [job title provided] that was briefed on the new process have both left the MPA.

**2) What were the controls that failed to allow these breaches to happen? Your letter refers to individual errors by both the MPA agent and by the [named therapy area] marketing manager, but why was there no further oversight?**

- **Pfizer policy approvals:**
  - Overall approval for the activity and HCPs to be supported was completed correctly in the *MAPP Navigator* system in line with the requirements of *MAPP*.
  - Only following approval of the *MAPP Navigator* project and return of signed *Invitation Letters* by the HCPs, is the MPA agent permitted to contact the HCPs in relation to organising their logistics. The MPA agent's activity was in accordance with this requirement.
  - The MPA agent is not permitted to book any aspect of HCP travel or accommodation outside of Pfizer policy. It is not known to Pfizer or the current MPA team why the agent sourced business class flight options for this booking, it is possibly due to the limited direct flight availability during the travel window.
  - The MPA agent requires Pfizer project owner approval of the travel and accommodation options prior to booking, to ensure consistency with the approved and where required certified arrangements.
    - Due to the limited direct return flight availability immediately post the congress, the MPA agent correctly requested approval from the marketing manager to potentially extend the HCPs' stay by one night to offer better direct flight times to the HCPs.
    - The MPA agent sought approval from the marketing manager for the hotel and flight options but this included non-compliant business class flights.
    - [Enclosure provided] shows that the marketing manager authorised the agent to offer the proposed hotel and business class flight options to the HCPs and subsequently provided approval for the booking to go ahead.
  - Through the marketing manager's failure to review the proposed flight options against Pfizer's policy requirements and previously certified International meetings form, they failed to ensure alignment with policy and the Code.

- The explanation provided by the marketing manager for approving the business class flights was that although they were surprised by the proposed class of flights, they assumed that the MPA agent was working to the requirements of the UK Country Annex and the Code.

- **Certification:**

- In November 2024, the marketing manager had obtained certification via the *International Meetings Form* for provision of registration fees only, under the previous policy framework.
- When the marketing manager decided to expand the support to be provided to include flights and accommodation under the new policy, they did not reinitiate the certification process and so certification was not completed for the additional elements of support.
- The marketing manager's explanation was that this was an oversight due to there being a pre-existing certificate.

- **Training, communication and support resources:**

- The [first compliance employee] supporting the [named therapy area] marketing team in collaboration with the [second compliance employee], held a briefing meeting to walk the team through the new process and distributed a follow up email highlighting key steps in the new process. This included a link to the resources on Pfizer UK's *eEquip Compliance Resource Centre (eEquip)* and a slide summarising the process flow.
- The section of *eEquip* relating to provision of support to attend Third Party Meetings was updated in January 2024 to reflect the new approach. This included a detailed step-by-step process flow with links to relevant policies for colleagues to follow. It is a well-established and well communicated company expectation that colleagues use the resources on *eEquip* to ensure they deliver their activities in alignment with Pfizer's policies and the Code.
- The marketing manager did not appropriately utilize the resources available to guide them through the process.

**3) How was the MPA agent able to book business class flights outside of the policy, without the appropriate documentation and approvals?**

- As we are not able to speak to the MPA agent or [their line manager] as they have both left the company, we cannot be certain of exactly how the error occurred.
- The MPA is not permitted to book flights out of policy. As the marketing manager provided approval for the booking to go ahead, we believe that MPA agent and their line manager considered this to be an exception approval authorising the agent to progress with the out of policy

booking.

#### 4) What corrective action have you taken on this matter?

- **International Meetings Form:**

- We have added the relevant policy guidance at the start of the form as a reminder to colleagues and have added additional questions and fields to the form to help ensure colleagues provide all relevant information for the signatories' review. Whilst this would not have prevented the certification omission error associated with the current matter, we consider the update an appropriate continuous improvement action.

- **UK Country Annex:**

- We have updated the *UK Country Annex* by adding the flight class restrictions into the table setting out the elements of support that can be provided to HCPs to attend congresses to ensure all key policy and Code requirements can be accessed easily. *eEquip* has been updated to reflect this.

- **Business class flight approvals:**

- Responsibility for oversight of the MPA has moved to our *MEET Operations Team* who also oversees and performs quality checks on transactions in the *MAPP Navigator system*. The *MEET Operations Team* is expert in the *UK Country Annex* and associated Code requirements. We have therefore introduced a requirement for the MPA to require additional approval from the head of the *MEET Operations Team* for any proposed booking of business class flights for HCPs. Business class flights should only be proposed for flights (>[specified number of hours duration]) associated with consultancy engagements. Referral of all proposed business class flights to the *MEET Operations Team Lead* will enable verification of the engagement type and any proposal associated with transaction types other than consultancy will be escalated to the UK Compliance Team for guidance. This will provide an additional control that would have prevented the current issue.

- **MPA materials:**

- We have reissued the updated *UK Country Annex* to the MPA.
- We have met with the current MPA [*job title provided*] and their line manager to re-enforce the key restrictions in relation to HCP delegate travel and to reiterate that there can be no exceptions to the class of travel restrictions.

- **Training:**

- We are in the process of moving to a new MPA and will ensure that they are fully trained on the *UK Country Annex* and the Code including lessons learned from this matter.
- The marketing manager will undergo retraining on return to Pfizer UK.

**5) How have you gained assurance that these were isolated incidents and would not reoccur?**

- We have reviewed all HCP flights booked by the UK organisation since January 2024 and can confirm that all other flight bookings comply with Pfizer policy and the Code.
- Please see the corrective and preventative actions described in section four above.

We believe that the policies, processes and resources that Pfizer has in place related to provision of support to HCPs are of the appropriate standard expected of our industry. Whilst our investigation into the matter has identified continuous improvement opportunities that further enhance our controls, we believe that the breaches of the clause 8.2, 10.1 and 5.2 that we have reported have resulted from individual isolated errors made by the MPA agent and the Pfizer colleague. We therefore do not believe that there have been additional breaches of Clauses 5.1 and 2 in this matter.”

**FURTHER INFORMATION FROM PFIZER**

Pfizer’s response to a letter from the Panel is reproduced below:

“Thank you for your letter dated 15<sup>th</sup> January 2026 concerning Pfizer’s voluntary admission of breaches of the Code associated with the support provided to four healthcare professionals (HCPs) to attend an international congress. We apologise for incorrectly citing clauses of the 2024 Code instead of the 2021 Code and we appreciate the opportunity to provide further comments regarding the admission of a breach of clause 5.2.

It is our opinion that the errors identified by Pfizer in this matter do not represent a breach of clause 5.2 of the 2021 Code. The errors identified by Pfizer in this matter did not cause offence to the HCPs supported to attend the international congress and did not fail to recognise their professional standing. We therefore do not acknowledge a breach of clause 5.2 under the 2021 Code in relation to this matter.

Further to our previous letter, we believe that the policies, processes and resources that Pfizer had in place related to provision of support to HCPs, were of the appropriate standard expected of our industry. However we acknowledge that on this occasion, one of our colleagues failed to discharge their duties and oversight of the Meeting Planning Agency to the expected standard and therefore under the 2021 Code of Practice, Pfizer must acknowledge a breach of clause 5.1.”

## PANEL RULING

A voluntary admission was received from Pfizer concerning the travel arrangements of four UK health professionals who were supported to attend an international congress in Asia in 2024.

Pfizer identified through its audit activities that the four health professionals received business class return flight tickets, which was not consistent with the requirements of Clause 10.1 of the Code.

Clause 10.1 required, among other things, that travel costs must be strictly limited to the main purpose of the event/meeting, must be of secondary consideration and must be appropriate and not out of proportion to the occasion. The supplementary information to that clause stated, among other things: *“Companies should only offer or provide economy air travel to delegates attending events/meetings. Delegates may organise and pay at their own expense the genuine cost of an upgrade. For flights that are scheduled to take longer than six hours, companies may pay for an upgrade from economy to premium economy or similar.”*

As Pfizer had provided the four health professionals with business class flights, the Panel ruled a **breach of Clause 10.1**, as acknowledged by Pfizer.

Pfizer also identified that not all relevant aspects of the support provided to the health professionals to attend the congress had been certified as required by Clause 8.2 of the Code.

The Panel noted Pfizer’s submission that the provision of congress registration passes had been certified on 14th December 2023. After a change to Pfizer’s policy and process in January 2024, the support for the health professionals to attend the congress was extended to also include accommodation and flights. Pfizer submitted that these additional elements had not been certified.

Clause 8.2 required that all events/meetings involving travel outside the UK, unless the company’s only involvement is to support a speaker to present at the meeting, must be certified in advance as set out in Clause 8.1 or by an appropriately qualified person signatory.

The supplementary information to Clause 8.2 ‘Events/Meetings Involving Travel Outside the UK’ stated, among other things: *“When certifying arrangements for events/meetings which involve travel outside the UK, all the relevant documents and arrangements must be considered, including the programme, the venue, the reasons for using that venue, the intended audience, the anticipated cost and the nature of the hospitality and the like.”*

As the full extent of the hospitality provided to the four UK health professionals had not been certified, the Panel ruled a **breach of Clause 8.2**, as acknowledged by Pfizer.

Pfizer had initially admitted a breach of Clause 5.2 of the 2024 Code (“All company personnel must maintain a high standard of ethical conduct in the discharge of their duties and comply with all relevant requirements of the Code.”). The 2021 Code was the applicable Code at the time of the activity at issue; the 2021 Code did not include an equivalent clause. The Panel concluded that Pfizer had responded regarding Clause 5.2 in error and therefore made no ruling in this regard.

The Panel acknowledged Pfizer's submission that it had reviewed all other international flight bookings made for UK health professionals for attendance at international congresses and Pfizer-organised meetings since the implementation of the new policy and had found no others that were inconsistent with the requirements of the Code. Pfizer submitted that the errors made in this case were an isolated incident and that it had appropriate policies, processes and resources in place. Pfizer acknowledged a breach of Clause 5.1, however, as an individual had failed to discharge their duties and oversight of the Meeting Planning Agency to the expected standard.

The Panel was concerned that by failing to follow the policies in place, business class flights had been provided to four health professionals. While it did not appear that the health professionals would have been attracted to attend the congress because of the flights, the Panel was concerned that Pfizer had neither certified the arrangements as required nor appropriately supervised the Meeting Planning Agency. The Panel considered that Pfizer had failed to maintain high standards and, therefore, ruled a **breach of Clause 5.1**, as acknowledged by Pfizer.

The Panel noted that excessive hospitality was an example of an activity that was likely to be in breach of Clause 2. From the information before the Panel, it appeared that the incident appeared to be an isolated matter. The Panel was concerned about the impression created by the arrangements but considered that its concerns were adequately addressed by its ruling of a breach of Clause 5.1 above. The Panel noted that a ruling of a breach of Clause 2 was a sign of particular censure and reserved for such use. **No breach of Clause 2** was ruled.

**Complaint received**      **4 July 2025**

**Case completed**        **5 February 2026**