CASE/0879/02/26 ***NO BREACH OF THE CODE***

COMPLAINANT v PFIZER

Allegations about promotion of dermatology products at a meeting

CASE SUMMARY

This case was in relation to a promotional meeting delivered by Pfizer. The complainant alleged that the meeting created a misleading impression that both Cibinqo (abrocitinib) and Litfulo (ritlecitinib) were "licensed for atopic dermatitis or alopecia", and that this was not the case. The complainant was concerned that there was no rationale for including the alopecia indication in a meeting discussing dermatitis. The complainant further alleged that as not all dermatologists are specialists in alopecia, this information was inappropriate and should not have been included.

The outcome under the 2024 Code was:

No Breach of Clause 2	**Requirement that activities or materials must not bring discredit upon, or reduce confidence in, the pharmaceutical industry**
No Breach of Clause 3.6	**Requirement that materials and activities must not be disguised promotion**
No Breach of Clause 5.1	**Requirement to maintain high standards at all times**
No Breach of Clause 5.3	**Requirement that all material and activities must recognise the special nature of medicines and respect the professional standing or otherwise of the audience to which they are directed**
No Breach of Clause 5.7	**Requirement that material should be tailored to the audience to whom it is directed**
No Breach of Clause 6.1	**Requirement that information/ claims/ comparisons must not be misleading**
No Breach of Clause 11.1	**Requirement that a medicine must not be promoted prior to the grant of its marketing authorisation**
No Breach of Clause 11.2	**Requirement that a medicine must be promoted in accordance with the terms of its marketing authorisation**
No Breach of Clause 15.6	**Requirement that promotional materials and activities must not be disguised**

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

FULL CASE REPORT

A complaint was received about Pfizer from an anonymous, non-contactable complainant who described themselves as a health professional.

COMPLAINT

The complaint wording is reproduced below with some typographical errors corrected:

> "I attended a meeting on atopic dermatitis. My expectation was the product being discussed will be Cibinqo since the invitation was JAKis for the treatment of atopic dermatitis but to my surprise there was an indication for another product for alopecia. How is it possible to do this? It was confusing and very misleading to see the indication for alopecia, it gave the impression that both products are licensed for atopic dermatitis or alopecia which is not the case. I believe the company did this intentionally to promote both their products in dermatology because there was no rationale for including the alopecia indication including its prescribing information in a meeting discussing dermatitis. Not all dermatologists are specialists in alopecia so this information was inappropriate and should have not been included. This behaviour from Pfizer is appalling and they should be held accountable for; - Clause 2 bringing discredit upon the industry - Clause 3.6 disguising promotion of their alopecia product in a dermatitis meeting - Clause 5.1 not maintaining high standards - Clause 5.3 and 5.7 not recognising that not all dermatology specialists are involved in alopecia and for not tailoring the information provided to the audience Clause 6 - for providing inaccurate information Clause 11 - unauthorised indications by giving the impression that both products can be used in dermatitis Clause 15.6 - disguised promotion of alopecia treatment in a dermatitis meeting."

When writing to Pfizer, the PMCPA asked it to consider the requirements of Clauses 3.6, 5.3, 5.7, 6.1, 11.1, 11.2, 15.6, 5.1 and 2 of the 2024 Code.

PFIZER'S RESPONSE

The response from Pfizer is reproduced below:

> "Thank you for your letter dated 13 February 2026 regarding a complaint received under the ABPI Code of Practice.
>
> Pfizer takes its responsibilities under the Code very seriously. Although the complaint does not include identifying details such as the date, venue, speaker or specific materials used, Pfizer has undertaken a structured review to identify the meeting most likely to be the subject of the allegation.
>
> **Relevant product information:**
> Cibinqo (abrocitinib) is indicated for the treatment of moderate-to-severe atopic dermatitis in adults and adolescents 12 years and older who are candidates for systemic therapy.
>
> Litfulo (ritlecitinib) is indicated for the treatment of severe alopecia areata in adults and adolescents 12 years of age and older.
>
> Our full response is set out below.
>
> **Identification of the potential material and meeting that is the subject of the complaint:**

In their letter of complaint, the complainant does not specify:

- The date of the meeting
- The location
- The organiser
- The speaker
- The unique identifier/job bag number of any material

We have therefore conducted a review of:

- All certified dermatology materials in use by customer facing colleagues since 1st January 2026
- All dermatology promotional speaker meetings held since 1 January 2026
- All certified dermatology promotional speaker meeting slide decks approved for use at meetings held since 1st January 2026.

We have focused our review on those activities and materials in use in 2026 which covers the six weeks prior to the complaint being submitted to the PMCPA on 13th February 2026. In the absence of any specific information from the complainant, we believe this is the most likely time period during which the meeting occurred that is the subject of the complaint.

Through our careful review we have identified one promotional slide deck for Cibinqo (abrocitinib), job bag reference PP-CIB-GBR-2014, that also includes reference to Litfulo (ritlecitinib) (*slide 33*).

The slide deck is comprised of 47 slides presenting information on;

- the treatment of Atopic Dermatitis,
- clinical evidence for the JAK inhibitors with a focus on Cibinqo and
- clinical experience and practice insights from a leading UK dermatology centre.

Slide deck PP-CIB-GBR-2014 was created in a collaboration between Pfizer and one of the consultant dermatologists practising at the dermatology centre. The slide deck was created as a resource to be presented at Pfizer organised speaker meetings by any of the consultants working at the dermatology centre.

The slide deck was reviewed and certified in Pfizer's electronic approval system by an appropriately registered final signatory in accordance with the requirements of clause 8.1 of the Code.

One slide in the presentation (*slide 33*), includes reference to Pfizer's medicine ritlecitinib with Alopecia Areata clearly identified as its indication in the body of the slide and in the references at the foot of the slide. The aim of the slide is to provide a high-level overview of the experience of JAK inhibitor prescribing at the dermatology centre. Four JAK inhibitors and three different indications are referenced on the slide. [screenshot of slide 33 provided]

As this represents proactive reference to a Pfizer medicine and its indication, the full indication statement for ritlecitinib, including black triangle and details of how to access the prescribing information are included in the title slide of the presentation along with the same information for Cibinqo, which is the intended focus of the presentation (*slide*

1). For speaker generated slides, it is Pfizer's standard practice to include all obligatory information for relevant Pfizer medicines on the title slide of the presentation. [screenshot of slide 1 provided]

We have not identified any other materials in current use that refer to both Cibinqo (abrocitinib) and JAK inhibitors for the treatment of Atopic Dermatitis as well as Litfulo (ritlecitinib). We have therefore concluded that it is this slide deck that is the most likely material to have been presented at the meeting that is the subject of this complaint.

We have identified three speaker meetings delivered in 2026 prior to receipt of the complaint where slide deck PP-CIB-GBR-2014 was presented and the colleagues responsible for each meeting have been interviewed.

MEETING 1	
Date	22nd January 2026
Pfizer Reference:	EV-374779
Meeting Title	From evidence to experience: JAKi use for AD and Development of a treatment pathway for moderate-severe atopic dermatitis in adult patients
Meeting Invitation	**PP-CIB-GBR-2181**
Meeting Type	Evening Speaker Meeting (promotional) Offsite
Speakers	2 Speakers Speakers were remote and both presented over Teams to a live audience
Attendees	9 attendees present in meeting room with Pfizer [named job title] • 5 Dermatology Consultants • 1 Dermatology Registrar • 1 Dermatology Clinical Nurse Specialist • 1 GP with a Special Interest in Dermatology • 1 Dermatology Advanced Clinical Practitioner
Presentations	• **PP-CIB-GBR-2014** (Includes Litfulo obligatory Information) • **PP-CIB-GBR-2093** (no reference to Litfulo)
Meeting summary	• The meeting was organised in discussion with one of the consultants to support the local service prepare to launch their Atopic Dermatitis service. • The meeting solely focused on Cibinqo with just a passing reference to ritlecitinib on slide 33 and no further discussion or questions related to Litfulo. • No attendees indicated any potential confusion or concerns that the slides or discussions were misleading regarding the Litfulo indication.

MEETING 2	
Date	22nd January 2026
Pfizer Reference:	EV-370614

Meeting Title	From Evidence to Experience, JAK use for AD at [named] NHS Foundation Trust
Meeting Invitation	**PP-CIB-GBR-2130**
Meeting Type	Evening Speaker Meeting (promotional) Offsite
Speakers	1 Speaker Speaker was remote and presented over Teams to a live audience
Attendees	8 attendees present in meeting room with Pfizer [two named job titles] • 5 Dermatology Consultants • 3 Dermatology Clinical Nurse Specialists
Presentations	• **PP-CIB-GBR-2014** (Includes Litfulo obligatory Information)
Meeting summary	• The meeting solely focused on Cibinqo with just a passing reference to ritlecitinib on slide 33 and no further discussion or questions related to Litfulo. • Questions and discussion following the speaker presentation focused on Cibinqo data and management of Atopic Dermatitis. • Prior to the meeting the lead consultant had requested a presentation of the Cibinqo Budget Impact Tool for Atopic Dermatitis (PP-CIB-GBR-2158) to the team. This was delivered by the Pfizer [named job title] prior to the speaker joining the meeting to deliver their presentation. • The model was well received and discussions continued on the topic of pathway implementation. A question was raised about real-world evidence for Cibinqo and a referral to the Pfizer medical team was initiated. There was no discussion of Litfulo. • No attendees indicated any potential confusion or concerns that the slides or discussions were misleading regarding the Litfulo indication.

MEETING 3	
Date	12th February 2026
Pfizer Reference:	EV-369522
Meeting Title	From Evidence to Experience, JAK use for AD at [named] NHS Foundation Trust
Meeting Invitation	**PP-CIB-GBR-2112**
Meeting Type	Lunchtime Speaker Meeting (promotional) Onsite in hospital department
Speakers	1 Speaker Speaker was remote and presented over Teams to a live audience
Attendees	9 attendees present in meeting room with Pfizer [two named job titles] • 4 Dermatology Consultants • 2 Dermatology Specialist Registrars • 1 Prescribing Nurse • 2 Dermatology Clinical Nurse Specialists

Presentations	• **PP-CIB-GBR-2014** (Includes Litfulo obligatory Information)
Meeting summary	• The Speaker presentation solely focused on Cibinqo with just a passing reference to ritlecitinib on slide 33 and no further discussion or questions related to Litfulo. • Questions and discussion with the speaker focused on Cibinqo data and the management of Atopic Dermatitis. • Prior to the start of the meeting two attendees proactively mentioned that Litfulo had been used in the department for the treatment of Alopecia Areata. Following the end of the speaker meeting, one of the consultants returned to the meeting room and initiated a conversation about Litfulo with the Pfizer colleagues. The Pfizer [named job title] used their approved Litfulo materials to facilitate the discussion about the use of Litfulo in the management of Alopecia Areata. The discussion was unsolicited and happened after the formal meeting had concluded. Only certified, approved materials were discussed and within the licensed indication. • At no point during the meeting did any attendee indicate any potential confusion or concerns that the slides or discussions were misleading regarding the Litfulo indication.

Through our interviews with the colleagues responsible for the three speaker meetings identified where slide deck PP-CIB-GBR-2014 was presented in 2026, we can find no evidence of misleading discussions or confusion relating to the use of Litfulo outside of its licensed indication.

Response to alleged breaches of the Code:

Clause 3.6 and 15.6 – Disguised promotion

The promotional nature of Pfizer organised speaker meetings is made explicitly clear in all materials associated with our meetings.

- Invitations distributed for Pfizer organised speaker meetings explicitly state that "*You are invited to attend a promotional meeting organised and funded by Pfizer Ltd which will include reference to Pfizer medicines relevant to the agenda topics*".
- All presentations approved for use at Pfizer organised speaker meetings have a standard title slide that also states that *"This promotional meeting is organised and funded by Pfizer Ltd for healthcare professionals in the United Kingdom (UK) and will include reference to Pfizer medicines relevant to the agenda topics"*.

The invitations for the three speaker meetings that we have reviewed all included the statement ensuring the promotional nature of the meetings was explicitly clear to all meeting invitees. On arrival at the meeting the first slide that the attendees at each meeting would have seen is slide one of slide deck PP-CIB-GBR-2014 which restates the promotional nature of the meeting and details the specific Pfizer medicines that are referenced in the presentation including the full indication statement for each medicine. Neither the promotional nature of the meeting nor the details of the specific Pfizer medicines and their indications that would be referenced in the meeting were in any way

disguised and as such Pfizer strongly refutes the allegations of breaches of clauses 3.6 and 15.6 of the Code.

Clause 5.3 and 5.7 – Suitability and provision of information tailored to the audience to whom it is directed.
Slide deck PP-CIB-GBR-2014 is a high quality, professional educational resource that recognises the professional standing of the audience for which it is intended. The reference to ritlecitinib for Alopecia Areata was appropriately included in slide 33 of the presentation to accurately describe the breadth of experience with JAK inhibitor prescribing at the speakers' dermatology centre. Ritlecitinib was referred to in the context of four JAK inhibitors used for three different indications at the centre and was deemed relevant and appropriate information for specialist dermatology audiences by the consultant dermatologist who had created the slides that described their dermatology centre's experience. The presentation in no way failed to recognise the special nature of medicines and the professional standing of the audience and was tailored by an expert dermatology consultant for the audience. Pfizer therefore rejects the allegation of breaches of clauses 5.3 and 5.7 of the Code.

Clause 6.1 – Information must be accurate and not misleading
Slide 33 of the slide deck PP-CIB-GBR-2014 clearly indicates that ritlecitinib is licensed for Alopecia Areata. This is prominently displayed in the slide graphic and is supported by the full indication statement as a reference at the foot of the slide.

The title slide of presentation PP-CIB-GBR-2014 includes the obligatory information for both of the Pfizer medicines that are proactively referenced in the presentation. The indication statements for Cibinqo and Litfulo are provided in full, adjacent to each, other clearly differentiating the approved uses of each medicine. A black triangle is displayed immediately before the first mention of Litfulo ensuring that the additional safety monitoring requirement is appropriately signalled to the audience.

The information provided for Litfulo in the presentation, is accurate, unambiguous and does not mislead either directly or by implication, nor by distortion, exaggeration or undue emphasis and Pfizer therefore denies the alleged breach of clause 6.1 of the Code.

Clause 11.1 and 11.2 – Promotion prior to marketing authorisation and promotion consistent with marketing authorisation
The licensed indication for Litfulo is clearly stated on both the title slide and slide 33 of slide deck PP-CIB-GBR-2014. The passing reference to Litfulo (ritlecitinib) is only included in the presentation for the purpose of describing the dermatology centre's experience with the JAK inhibitor class of medicines. At the three speaker meetings that have been delivered this year Pfizer colleagues have confirmed that there was no discussion of Litfulo beyond this passing reference and definitely not in the context of management of Atopic Dermatitis. As such both the written and spoken references to Litfulo (ritlecitinib) were consistent with its marketing authorisation and did not represent promotion prior to the grant of marketing authorisation. Pfizer therefore denies the alleged breaches of clause 11.1 and 11.2 of the Code.

Clause 5.1 and Clause 2 – Maintaining High Standards and upholding confidence in the industry

Pfizer strongly rejects the complainant's accusation that it was Pfizer's intention to promote both its products in dermatology. The reference to Litfulo (ritlecitinib) in slide deck PP-CIB-GBR-2014 is purely for the purposes of providing an overview of the dermatology centre's breadth of experience in using JAK inhibitors across three different dermatological conditions. The information related to Litfulo (ritlecitinib) contained within slide deck CIB-GBR-2014 is accurate, not misleading and contains all elements of the obligatory information required by the Code. Litfulo's indication statement is presented on the title slide and slide 33 of the presentation ensuring absolute clarity as to its licensed indication. The slide deck was developed through a collaboration with an expert consultant dermatologist to ensure provision of high-quality education and was certified by an experienced Code final signatory.

The three speaker meetings that we have reviewed in relation to this complaint were professionally and appropriately delivered by the Pfizer colleagues. The invitations made it explicitly clear that the meeting was promotional in nature, and the invitations were certified by an experienced Code final signatory prior to distribution. The Pfizer colleagues responsible for the meetings have confirmed that neither the speakers' delivery of the presentation, nor the discussion and question and answers with the attendees in any way suggested that Litfulo was a potential treatment option for the management of Atopic Dermatitis. We strongly believe that we have maintained high standards and have not reduced confidence in our industry, and we deny the alleged breaches of Clause 5.1 and 2 of the Code.

Thank you for your careful consideration of our response, please let me know if you need any further information."

PANEL RULING

This complaint was in relation to a promotional meeting delivered by Pfizer. The complainant alleged that the meeting created a misleading impression that both Cibinqo (abrocitinib) and Litfulo (ritlecitinib) were "licensed for atopic dermatitis or alopecia", and that this was not the case. The complainant further alleged that Pfizer deliberately intended to promote both products in dermatology and that there was no rationale for including the alopecia indication and respective prescribing information, in a meeting discussing dermatitis. The complainant went on to allege that as not all dermatologists are specialists in alopecia, this information was inappropriate and should not have been included.

The Panel noted that the complainant had not specified the name, date, location, speaker's name or any other unique identifier for materials for the meeting in question. As the complainant was not contactable, these details could not be requested from the complainant. The complaint was received on 14 February 2026; Pfizer submitted that it therefore conducted a review of all dermatology materials, promotional speaker meetings and slide decks approved for use since 1 January 2026. The Panel noted Pfizer's submission that through careful review it was able to identify one promotional slide deck for Cibinqo, job bag reference PP-CIB-GBR-2014, that also included reference to Litfulo, and identified three speaker meetings delivered in 2026 prior to receipt of the complaint where this slide deck was presented. Pfizer submitted the three corresponding meeting invitations as part of its response.

The Panel did not have information before it regarding which of the three meetings the complainant might have attended. The Panel took account of the three meeting invitations and made its rulings based on the slide deck PP-CIB-GBR-2014, as identified by Pfizer.

The slide deck in question included the title "From evidence to experience: JAKi use for AD at [named] NHS Foundation Trust" in large, prominent font. The title slide included a prominent Cibinqo logo in the top right corner with a black triangle and its non-proprietary name. The Cibinqo and Litfulo indications appeared in smaller, bold font towards the middle of the slide, followed by the statements:

- *"This promotional meeting is organised and funded by Pfizer Ltd for healthcare professionals in United Kingdom (UK) only and will include reference to Pfizer medicines relevant to the agenda topics.*
- *"CIBINQO (abrocitinib) and LITFULO (ritlecitinib) prescribing information is available at this meeting from a Pfizer rep or via QR code at the end of the presentation. If attending virtually this will be provided to you via the joining instructions."*

The adverse event reporting statement, abbreviations, references and Pfizer logo were present near the bottom of the slide.

Misleading promotion of Cibinqo and Litfulo

The Panel understood the complainant's allegation to be that the presentation created the misleading impression that Cibinqo and Litfulo were both licensed in atopic dermatitis and alopecia.

The Panel noted that at the time of the complaint the indications were as follows:

- Cibinqo is indicated for the treatment of moderate-to-severe atopic dermatitis in adults and adolescents 12 years and older who are candidates for systemic therapy.

- Litfulo is indicated for the treatment of severe alopecia areata in adults and adolescents 12 years of age and older.

The Panel noted that the presentation comprised of 48 slides, with a focus on atopic dermatitis. The slides started by illustrating self-reported treatment needs of patients with atopic dermatitis and went on to describe four clinical trials comparing the safety and efficacy of JAK (Janus kinase) inhibitors versus biologics such as dupilumab in the first 27 slides. The second half of the presentation discussed the experience of a multidisciplinary team from a named NHS Trust involved in treating patients with JAK inhibitors. Slide 31 discussed the approach to general prescribing in atopic dermatitis and illustrated a treatment pathway for adults with moderate to severe atopic dermatitis. Slide 32, titled "How do you choose which treatment to use?" included a list of considerations such as personal factors, presentation on certain parts of the body and risk factors. Slide 33, which mentioned alopecia areata, was titled "[named NHS Trust] JAKi prescribing in dermatology". The slide included the following bullet points:

- "First prescribed for adults with AD
- Subsequently prescribed for adults and adolescents for AD
- Now prescribed for autoimmune hair loss (alopecia areata) with quick update"

This was followed by a graphic listing four JAK inhibitors (baricitinib, upadacitinib, abrocitinib and ritlecitinib) and their corresponding indications. Alopecia areata was listed as the indication for ritlecitinib.

The Panel noted Litfulo (ritlecitinib) was mentioned by brand or its non-proprietary names, a total of seven times in the presentation, as follows:

- Three times on the title slide
  - Once in the indication
  - Once in reference to where its prescribing information could be found
  - Once in the references
- Three times on slide 33
  - Once in the graphic in reference to its use as a JAK3/TEC kinase family inhibitor for the treatment of alopecia areata
  - Once in the indication within the footnote of the slide
  - Once in the references
- Once on slide 47 which included a QR code for its prescribing information

The Panel noted reference to alopecia areata was made a total of five times throughout the presentation, as follows:

- Once on the title slide in relation to the indication for Litfulo
- Four times on slide 33
  - Once in the statement that JAKi are *"Now prescribed for autoimmune hair loss (alopecia areata) with quick uptake"*
  - Once in the graphic in reference to its use as a JAK3/TEC kinase family inhibitor for the treatment of alopecia areata
  - Once in the Litfulo indication within the footnote of the slide
  - Once in the reference section

The Panel reviewed the content of the presentation and considered whether it complied with the requirements of Clause 6.1 which included, among other things, that information, claims and comparisons must not mislead.

The Panel noted Pfizer's submission that the title slide of presentation PP-CIB-GBR-2014 included the obligatory information for both of the Pfizer medicines that were proactively referenced in the presentation. The indication statements for Cibinqo and Litfulo were provided in full, adjacent to each other, clearly differentiating the approved uses of each medicine.

While the Panel noted the reference to Litfulo on seven occasions, and its indication in alopecia areata on five occasions, the Panel considered the overall impression of the slides. In the Panel's view, slide 33 served to provide an overview of the broad adoption of JAK inhibitor use in a specific speciality (dermatology). The mention of Litfulo on slide 33 in the graphic in reference to its use as a JAK3/TEC kinase family inhibitor for the treatment of alopecia areata, and other mentions in its indication and references, in the context of a detailed presentation with a focus on JAK inhibitor use in atopic dermatitis, did not create a misleading impression that Litfulo could be prescribed for atopic dermatitis, or that both Cibinqo and Litfulo could be prescribed in alopecia areata. The Panel therefore ruled **no breach of Clause 6.1**.

Clauses 11.1 stated that a medicine must not be promoted prior to the grant of the marketing authorisation which permits its sale or supply, and Clause 11.2 stated that the promotion of a medicine must be in accordance with the terms of its marketing authorisation and must not be

inconsistent with the particulars listed in its summary of product characteristics. Noting its comments and ruling above, the Panel did not consider that Pfizer had promoted Cibinqo or Litfulo prior to the grant of the marketing authorisation, or in a in manner that was not in accordance with the terms of their marketing authorisations. Therefore, the Panel ruled **no breach of Clauses 11.1 and 11.2.**

Disguised promotion

The complainant alleged that the meeting constituted "disguised promotion of alopecia treatment in a dermatitis meeting".

As noted above, Pfizer had identified and submitted three meeting invitations as part of its response. Each of the three invitations included the following information:

- The top banner included the title of the meeting, date, location and timings
- A statement explaining where prescribing information and adverse event reporting information could be found
- A statement describing the meeting as "a promotional meeting organised and funded by Pfizer Ltd which will include reference to Pfizer medicines relevant to agenda topics."
- Agenda and timings
- Host and speaker details
- Information on how to register

The Panel noted there were differences between the meeting titles stated on the invitations provided by Pfizer. The title of the meeting was "From evidence to experience: JAKi use for AD at [named] NHS Foundation Trust" on two of the three meeting invitations, while one of the three meeting invitations described the meeting topic as "From Evidence to Experience: JAKi use for AD and Development of a Treatment Pathway for Moderate-Severe Atopic Dermatitis in Adult Patients"

The Panel further noted that the prescribing information for Cibinqo alone was included on two of the invitations, and one invitation included prescribing information for both Cibinqo and Litfulo. The Panel understood from Pfizer's submission that the same slide deck PP-CIB-GBR-2014 was presented at the three meetings.

The Panel noted that the opening slide of the presentation included:

- the Cibinqo and Litfulo indications;
- reference to prescribing information for both products;
- a prominent Cibinqo logo;
- meeting title mentioning JAKi use for atopic dermatitis;
- the statement *"This promotional meeting is organised and funded by Pfizer Ltd for healthcare professionals in United Kingdom (UK) only and will include reference to Pfizer medicines relevant to the agenda topics.";*
- and, an adverse event reporting box.

The Panel noted Pfizer's submission that invitations distributed for Pfizer-organised speaker meetings explicitly state, "You are invited to attend a promotional meeting organised and funded

by Pfizer Ltd which will include reference to Pfizer medicines relevant to the agenda topics", and that the invitations for the three speaker meetings reviewed by Pfizer included this statement.

Clause 3.6 stated materials and activities must not be disguised promotion, and Clause 15.6 stated promotional material and activities must not be disguised.

The Panel noted its comments above in relation to the content of the presentation, which included clinical trial data on the safety and efficacy of JAK inhibitors, treatment experience and treatment pathways for atopic dermatitis. The Panel considered the immediate and overall impression created, the content of the presentation, the information on the title slide, the statement on the invitations and that the meeting was organised by Pfizer. In the Panel's view, delegates would reasonably expect discussion of Pfizer's products. The Panel therefore ruled **no breach of Clauses 3.6 and 15.6** accordingly**.**

Suitability and the provision of tailored information

The complainant alleged that the meeting failed to recognise that not all dermatology specialists are involved in alopecia [care] and that the information provided was not tailored to the audience.

Clause 5.3 stated, among other things, that all material and activities must recognise the special nature of medicines and respect the professional standing or otherwise of the audience to which they are directed, and Clause 5.7 stated that material should only be provided or made available to those groups of people whose need for or interest in it can reasonably be assumed and should be tailored to the audience to whom it is directed.

The Panel noted that the Cibinqo summary of product characteristics, Section 4.2 Posology and method of administration, stated that treatment should be initiated and supervised by a healthcare professional experienced in the diagnosis and treatment of atopic dermatitis.

The Panel noted that the Litfulo summary of product characteristics, Section 4.2 Posology and method of administration, similarly stated that treatment should be initiated and supervised by a healthcare professional experienced in the diagnosis and treatment of alopecia areata.

The Panel noted Pfizer's submission that the slide deck was created as a resource to be presented at Pfizer organised speaker meetings by any of the consultants working at the dermatology centre, and that ritlecitinib was referred to in the context of four JAK inhibitors used for three different indications at the NHS centre and was deemed relevant and appropriate information for specialist dermatology audiences by the consultant dermatologist who had created the slides that described their dermatology centre's experience.

The Panel considered the scope of practice of dermatologists, which covered broad inflammatory and autoimmune skin conditions, including atopic dermatitis and alopecia. Whilst not *all* dermatologists might specialise in the treatment of alopecia, some dermatologists would be involved in the treatment of alopecia as well as atopic dermatitis. The Panel considered that the presentation in question was about the use of JAK inhibitors in atopic dermatitis, a condition that was routinely managed by dermatologists. In the Panel's view, the complainant had not established that Pfizer had failed to recognise that not all dermatology specialists are involved in the treatment of alopecia, or that it had failed to tailor the information to the audience. The Panel ruled **no breach of Clauses 5.3 and 5.7** accordingly.

High standards and bringing discredit upon the industry

Taking into account its rulings of no breaches above, the Panel considered that the complainant had not established that Pfizer had failed to maintain high standards, or had brought discredit upon, or reduced confidence in, the pharmaceutical industry. The Panel therefore ruled **no breach of Clauses 5.1 and 2.**

Complaint received **13 February 2026**

Case completed **14 October 2026**