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BY EMAIL (shareholderproposals@sec.gov)

December 18, 2020

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

RE: Pfizer Inc. – 2021 Annual Meeting
Omission of Shareholder Proposal of
Trinity Health and co-filers¹

Ladies and Gentlemen:

We are writing pursuant to Rule 14a-8(j) promulgated under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), to request that the Staff of the Division of Corporation Finance (the “Staff”) of the Securities and Exchange Commission (the “Commission”) concur with our view that, for the reasons stated below, Pfizer Inc., a Delaware corporation (“Pfizer”), may exclude the shareholder proposal and supporting statement (the “Proposal”) submitted by Trinity Health and co-filers from the proxy materials to be distributed by Pfizer in connection with its 2021 annual meeting of shareholders (the “2021 proxy materials”). Trinity Health and the co-filers are sometimes collectively referred to as the “Proponents.”

In accordance with Section C of Staff Legal Bulletin No. 14D (Nov. 7, 2008) (“SLB 14D”), we are emailing this letter and its attachments to the Staff at shareholderproposals@sec.gov. In accordance with Rule 14a-8(j), we are simultaneously sending a copy of this letter and its attachments to the Proponents as notice of Pfizer’s intent to omit the Proposal from the 2021 proxy materials.

Rule 14a-8(k) and Section E of SLB 14D provide that shareholder proponents are required to send companies a copy of any correspondence that the shareholder proponents elect to submit to the Commission or the Staff. Accordingly, we are taking this opportunity

¹ The following shareholders have co-filed the Proposal: Adrian Dominican Sisters; American Baptist Home Mission Societies; CommonSpirit Health; Congregation of Divine Providence; Mercy Investment Services, Inc.; Miller/Howard Investments, Inc. on behalf of Keith Thompson; Monasterio De San Benito; Oxfam America, Inc.; PeaceHealth; Providence Trust; Reynders, McVeigh Capital Management, LLC; Sisters of Charity of the Blessed Virgin Mary; Sisters of St. Francis of Philadelphia; The Sisters of Charity of Saint Elizabeth.

to remind the Proponents that if they submit correspondence to the Commission or the Staff with respect to the Proposal, a copy of that correspondence should concurrently be furnished to the undersigned.

I. The Proposal

The text of the resolution contained in the Proposal is set forth below:

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

II. Bases for Exclusion

We hereby respectfully request that the Staff concur with Pfizer’s view that the Proposal may be excluded from the 2021 proxy materials pursuant to:

- Rule 14a-8(i)(7) because the Proposal deals with matters relating to Pfizer’s ordinary business operations; and
- Rule 14a-8(i)(10) because Pfizer has substantially implemented the Proposal.

III. Background

Pfizer received the Proposal on November 5, 2020, accompanied by a cover letter from Trinity Health and a letter from The Northern Trust Company, dated November 5, 2020, verifying Trinity Health’s stock ownership (the “Broker Letter”). Copies of the Proposal, cover letter, Broker Letter and related correspondence are attached hereto as Exhibit A. In addition, the co-filers’ submissions are attached hereto as Exhibit B.

IV. The Proposal May be Excluded Pursuant to Rule 14a-8(i)(7) Because the Proposal Deals with Matters Relating to Pfizer’s Ordinary Business Operations.

Under Rule 14a-8(i)(7), a shareholder proposal may be excluded from a company’s proxy materials if the proposal “deals with matters relating to the company’s ordinary business operations.” In Exchange Act Release No. 34-40018 (May 21, 1998) (the “1998 Release”), the Commission stated that the policy underlying the ordinary business exclusion rests on two central considerations. The first recognizes that certain tasks are so fundamental to management’s ability to run a company on a day-to-day basis that they could not, as a practical matter, be subject to direct shareholder oversight. The second consideration relates to the degree to which the proposal seeks to “micro-manage” the company by probing too

deeply into matters of a complex nature upon which shareholders, as a group, would not be in a position to make an informed judgment. As demonstrated below, the Proposal implicates both of these two central considerations.

A. *The Proposal relates to Pfizer's ordinary business matters.*

The Commission has stated that a proposal requesting the dissemination of a report is excludable under Rule 14a-8(i)(7) if the substance of the proposal involves a matter of ordinary business of the company. *See* Exchange Act Release No. 34-20091 (Aug. 16, 1983) (the "1983 Release") ("[T]he staff will consider whether the subject matter of the special report or the committee involves a matter of ordinary business; where it does, the proposal will be excludable under Rule 14a-8(c)(7)."); *see also Netflix, Inc.* (Mar. 14, 2016) (permitting exclusion under Rule 14a-8(i)(7) of a proposal that requested a report describing how company management identifies, analyzes and oversees reputational risks related to offensive and inaccurate portrayals of Native Americans, American Indians and other indigenous peoples, how it mitigates these risks and how the company incorporates these risk assessment results into company policies and decision-making, noting that the proposal related to the ordinary business matter of the "nature, presentation and content of programming and film production").

The Staff has consistently permitted exclusion of shareholder proposals under Rule 14a-8(i)(7) when those proposals relate to how a company makes specific pricing decisions regarding certain of its products. *See, e.g., Verizon Communications Inc.* (Jan. 29, 2019) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting that the company offer its shareholders the same discounts on its products and services that are available to its employees, noting that the proposal related to the company's discount pricing policies); *Host Hotels & Resorts, Inc.* (Feb. 6, 2014) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting that the board consider providing senior citizens and stockholders discounts on hotel rates, noting that discount pricing policy determinations is an ordinary business matter); *Equity LifeStyle Properties, Inc.* (Feb. 6, 2013) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting a report on, among other things, "the reputational risks associated with the setting of unfair, inequitable and excessive rent increases that cause undue hardship to older homeowners on fixed incomes" and "potential negative feedback stated directly to potential customers from current residents," noting that the "setting of prices for products and services is fundamental to management's ability to run a company on a day-to-day basis"); *Ford Motor Co.* (Jan. 31, 2011) (permitting exclusion under Rule 14a-8(i)(7) of a proposal seeking to allow shareholders who purchased a new vehicle and "had no spare tire and hardware for mounting [the spare tire] . . . be able to purchase same from Ford Motor at the manufacturing cost of same," noting that "the setting of prices for products and services is fundamental to management's ability to run a company on a day-to-day basis"); *Western Union Co.* (Mar. 7, 2007) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting that the board review, among other things, the effect of the company's remittance practices on the communities served and compare the company's fees, exchange rates, and

pricing structures with other companies in its industry, noting that the proposal related to the company's "ordinary business operations (*i.e.*, the prices charged by the company)").

In particular, the Staff has permitted exclusion of shareholder proposals under Rule 14a-8(i)(7) where the proposals related to the pricing of a particular group of prescription drugs. *See AbbVie Inc.* (Feb. 24, 2017) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting a report on "the rationale and criteria used" to determine "the rates of price increases year-to-year of the company's top ten selling branded prescription drugs between 2010 and 2016," noting that the company's "rationale and criteria for price increases" of such prescription drugs related to ordinary business operations); *Biogen Inc.* (Feb. 23, 2017) (same); *Gilead Sciences, Inc.* (Feb. 10, 2017) (same); *Johnson & Johnson* (Feb. 10, 2017) (same); *Pfizer Inc.* (Feb. 10, 2017) (same).

In addition, the Staff has permitted exclusion of shareholder proposals under Rule 14a-8(i)(7) when those proposals request a report on how companies intend to respond to certain external pressures relating to pricing policies or price increases. *See Johnson & Johnson* (Jan. 12, 2004) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting that the board review pricing and marketing policies and prepare a report on how the company will respond to certain external pressures to increase access to prescription drugs); *see also UnitedHealth Group Inc.* (Mar. 16, 2011) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting a board report on how the company is responding to certain external pressures to ensure affordable health care coverage and the measures the company is taking to contain price increases of health insurance premiums as relating to ordinary business matters).

We are aware that, under certain limited circumstances, the Staff has declined to permit the exclusion of proposals relating to the company's overall pricing policies for pharmaceutical products. In all of those instances, however, the proposals focused solely on the company's fundamental business strategy with respect to its pricing policies for pharmaceutical products, rather than on specific pricing decisions regarding particular products. *See Celgene Corp.* (Mar. 19, 2015) (declining to permit exclusion under Rule 14a-8(i)(7) of a proposal requesting a report on the risks to the company from rising pressure to contain U.S. specialty drug prices, noting that the proposal focused on the company's "fundamental business strategy with respect to its pricing policies for pharmaceutical products"); *Vertex Pharmaceuticals Inc.* (Feb. 25, 2015) (same); *Gilead Sciences, Inc.* (Feb. 23, 2015) (same); *Bristol-Myers Squibb Co.* (Feb. 21, 2000) (declining to permit exclusion under Rule 14a-8(i)(7) of a proposal requesting that the board create and implement a policy of price restraint on pharmaceutical products for individual customers and institutional purchasers to keep drug prices at reasonable levels and report to shareholders any changes in its pricing policies and procedures, noting that the proposal related to the company's "fundamental business strategy, *i.e.*, its pricing for pharmaceutical products"); *Warner-Lambert Co.* (Feb. 21, 2000) (same); *Eli Lilly and Co.* (Feb. 25, 1993) (declining to permit exclusion under Rule 14a-8(i)(7) where the proposal asked the board "to seek input on its pricing policy from consumer groups, and to adopt a policy of price restraint," noting that the

proposal related to “the [c]ompany’s fundamental business strategy with respect to its pricing policy for pharmaceutical products”).

In addition, the Staff also has permitted exclusion of shareholder proposals under Rule 14a-8(i)(7) when those proposals relate to a company’s sources of financing. In *General Electric Co.* (Feb. 15, 2000), for example, the Staff permitted exclusion under Rule 14a-8(i)(7) of a proposal requesting that the company report on the financial benefits received by the company from various government incentive programs, including direct subsidies and below-market financing backed by government funds or government guarantees. In the supporting statement of the proposal, the proponents argued that the company faced risks from relying on government financial assistance. In concurring with the company’s view that the proposal could be excluded under Rule 14a-8(i)(7), the Staff noted that the proposal related to “a source of financing” and therefore to a matter of ordinary business operations. *See also, e.g., Pfizer Inc.* (Feb. 16, 2011) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting an annual assessment and report of risks created by actions the company takes to avoid or minimize U.S. federal, state and local taxes, noting that the proposal related to “decisions concerning the company’s tax expenses and sources of financing”); *The TJX Companies, Inc.* (Mar. 29, 2011) (same); *Pfizer Inc.* (Feb. 5, 2003) (permitting exclusion under Rule 14a-8(i)(7) of a proposal requesting a report on “each tax break that provides the company with more than \$5 million of tax savings,” noting that the proposal related to the “disclosure of the sources of financing”).

In this instance, the Proposal concerns ordinary business matters related to Pfizer’s pricing decisions regarding particular products and the sources of financing for those products (in the form of advance purchases by the federal government or other governmental funding for Pfizer’s business partner). Specifically, the Proposal focuses on Pfizer’s pricing decision on “a vaccine or therapeutics for COVID-19” and how “receipt by Pfizer or its business partners of public financial support” may influence such pricing decision. In this regard, the supporting statement asserts that Pfizer’s business partner for developing a COVID-19 vaccine, BioNTech, “received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity” and questions how this business partner’s funding will be taken into account in setting a price for COVID-19 products. This focus demonstrates a concern with the ordinary business matter of how, when and why Pfizer decides the prices of certain of its products and the relationship that certain sources of financing may factor into such decisions. These business and operational decisions are complex and fall squarely within the purview of management and could not, as a practical matter, be subject to direct shareholder oversight. In the instant case, the relationship between Pfizer and its business partner and the impact of foreign governmental funding on that relationship and on any COVID-19 or therapeutic resulting from the business partnership add further layers of complexity. In addition, unlike those proposals described above where the Staff was unable to concur in the company’s request for exclusion, this Proposal is not remotely concerned with Pfizer’s fundamental business strategy for all of its products. Instead, the Proposal features a singular focus on pricing for COVID-19 vaccines and therapeutics. For this reason, the Proposal is excludable under Rule 14a-8(i)(7).

We note that a proposal may not be excluded under Rule 14a-8(i)(7) if it is determined to focus on a significant policy issue. The fact that a proposal may touch upon a significant policy issue, however, does not preclude exclusion under Rule 14a-8(i)(7). Instead, the question is whether the proposal focuses primarily on a matter of broad public policy versus matters related to the company's ordinary business operations. *See* the 1998 Release and Staff Legal Bulletin No. 14E (Oct. 27, 2009). The Staff has consistently permitted exclusion of shareholder proposals where the proposal focused on ordinary business matters, even though it also related to a potential significant policy issue. In *PetSmart, Inc.* (Mar. 24, 2011), for example, the proposal requested that the company's board require suppliers to certify that they had not violated certain laws regulating the treatment of animals. Those laws affected a wide array of matters dealing with the company's ordinary business operations beyond the humane treatment of animals, which the Staff has recognized as a significant policy issue. In granting relief to exclude the proposal, the Staff noted the company's view that "the scope of the laws covered by the proposal is 'fairly broad in nature from serious violations such as animal abuse to violations of administrative matters such as record keeping.'" *See also, e.g., CIGNA Corp.* (Feb. 23, 2011) (permitting exclusion under Rule 14a-8(i)(7) when, although the proposal addressed the potential significant policy issue of access to affordable health care, it also asked CIGNA to report on expense management, an ordinary business matter); *Capital One Financial Corp.* (Feb. 3, 2005) (permitting exclusion under Rule 14a-8(i)(7) when, although the proposal addressed the significant policy issue of outsourcing, it also asked the company to disclose information about how it manages its workforce, an ordinary business matter).

In this instance, as described above, the Proposal focuses on the ordinary business matter of Pfizer's pricing decision for particular products—COVID-19 vaccines and therapeutics—and how any public funding is taken into account when making those decisions. Therefore, even if the Proposal could be viewed as touching upon a significant policy issue, its focus is on ordinary business matters. Accordingly, the Proposal may be excluded under Rule 14a-8(i)(7).

B. The Proposal seeks to micromanage Pfizer.

The Staff has consistently agreed that shareholder proposals attempting to micromanage a company by probing too deeply into matters of a complex nature upon which shareholders, as a group, are not in a position to make an informed judgment are excludable under Rule 14a-8(i)(7). *See* the 1998 Release; *see also, e.g., Walgreens Boots Alliance, Inc.* (Nov. 20, 2018) (permitting exclusion under Rule 14a-8(i)(7) on the basis of micromanagement of a proposal that requested open market share repurchase programs or stock buybacks subsequently adopted by the board not become effective until approved by shareholders); *JPMorgan Chase & Co.* (Mar. 30, 2018) (permitting exclusion under Rule 14a-8(i)(7) on the basis of micromanagement of a proposal that requested a report on the reputational, financial and climate risks associated with project and corporate lending, underwriting, advising and investing on tar sands projects).

In Staff Legal Bulletin No. 14J (Oct. 23, 2018), the Staff reiterated that a proposal micromanages a company when it “involves intricate detail, or seeks to impose specific time-frames or methods for implementing complex policies.” The Staff explained that the micromanagement basis of exclusion “also applies to proposals that call for a study or report” and, therefore, a proposal that seeks an intricately detailed study or report may be excluded on micromanagement grounds. Further, the Staff stated that it “would, consistent with Commission guidance, consider the underlying substance of the matters addressed by the study or report” to determine whether a proposal involves intricate detail, or seeks to impose specific time-frames or methods for implementing complex policies.

In this case, the Proposal attempts to micromanage Pfizer by requesting an intricately detailed report. In particular, the Proposal’s resolution requests a report on how any public funding is being or will be taken into account when setting prices for COVID-19 vaccines or therapeutics. The supporting statement goes on to discuss potential reputational and regulatory risks, production timelines, intellectual property considerations, and supply demands in relation to COVID-19 products. As exemplified by these varied features, any pricing decisions for COVID-19 vaccines and therapeutics are inherently complex matters upon which shareholders, as a group, are not in a position to make an informed judgment. Moreover, the scope of the report requested by the Proposal would be especially detailed.

As explained on Pfizer’s corporate website, Pfizer takes into account myriad factors when pricing pharmaceutical products. For instance, Pfizer considers the product’s impact on patients and their disease, other available treatments, its potential to reduce other health care costs, such as hospital stays, and preserving the ability to invest in future developments.² In this regard, pricing decision for Pfizer’s COVID-19 vaccine may involve even more complexities, given the rapid, emergency development process for the vaccine and the scale of the pandemic. Further, the Proposal requests a highly detailed report on the complex relationship between Pfizer’s business partner’s receipt of foreign governmental funding and the pricing of Pfizer’s COVID-19 vaccine. By requesting such an intricately detailed report, the Proposal seeks to micromanage Pfizer’s business. Therefore, the Proposal is precisely the type of effort that Rule 14a-8(i)(7) is intended to prevent.

Accordingly, the Proposal should be excluded from Pfizer’s 2021 proxy materials pursuant to Rule 14a-8(i)(7) as relating to Pfizer’s ordinary business operations.

V. The Proposal May be Excluded Pursuant to Rule 14a-8(i)(10) Because Pfizer Has Substantially Implemented the Proposal.

Rule 14a-8(i)(10) permits a company to exclude a shareholder proposal if the company has already substantially implemented the proposal. The Commission adopted the “substantially implemented” standard in 1983 after determining that the “previous formalistic

² See *How Does Pfizer Price Medicines?*, available at https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines and attached hereto as Exhibit C.

application” of the rule defeated its purpose, which is to “avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management.” *See* 1983 Release; Exchange Act Release No. 34-12598 (July 7, 1976). Accordingly, the actions requested by a proposal need not be “fully effected” provided that they have been “substantially implemented” by the company. *See* 1983 Release.

Applying this standard, the Staff has consistently permitted the exclusion of a proposal when it has determined that the company’s policies, practices and procedures or public disclosures compare favorably with the guidelines of the proposal. *See, e.g., Devon Energy Corp.* (Apr. 1, 2020)*; *Johnson & Johnson* (Jan. 31, 2020)*; *Pfizer Inc.* (Jan. 31, 2020)*; *The Allstate Corp.* (Mar. 15, 2019); *Johnson & Johnson* (Feb. 6, 2019); *United Cont’l Holdings, Inc.* (Apr. 13, 2018); *eBay Inc.* (Mar. 29, 2018); *Kewaunee Scientific Corp.* (May 31, 2017); *Wal-Mart Stores, Inc.* (Mar. 16, 2017); *Dominion Resources, Inc.* (Feb. 9, 2016); *Ryder System, Inc.* (Feb. 11, 2015); *Wal-Mart Stores, Inc.* (Mar. 27, 2014).

In addition, the Staff has permitted exclusion under Rule 14a-8(i)(10) where the company already addressed the underlying concerns and satisfied the essential objectives of the proposal, even if the proposal had not been implemented exactly as proposed by the proponent. For example, in *Oshkosh Corp.* (Nov. 4, 2016), the Staff permitted exclusion under Rule 14a-8(i)(10) of a proposal asking the board to amend certain provisions of the company’s proxy access bylaw in accordance with the six “essential elements” specified in the proposal. In arguing that the proposal had been substantially implemented, the company explained that it had adopted three of the six proposed changes in the proposal. Although the proposal asked for the adoption of all of the proposed changes, the Staff concluded that the company’s bylaw amendments “compare favorably with the guidelines of the proposal” and that the company substantially implemented the proposal. Similarly in *PG&E Corp.* (Mar. 10, 2010), the Staff permitted exclusion under Rule 14a-8(i)(10) of a proposal requesting that the company provide a report disclosing, among other things, the company’s standards for choosing the organizations to which the company makes charitable contributions and the “business rationale and purpose for each of the charitable contributions.” In arguing that the proposal had been substantially implemented, the company referred to a website where the company had described its policies and guidelines for determining the types of grants that it makes and the types of requests that the company typically does not fund. Although the proposal appeared to contemplate disclosure of each and every charitable contribution, the Staff concluded that the company had substantially implemented the proposal. *See also, e.g., The Wendy’s Co.* (Apr. 10, 2019) (permitting exclusion under Rule 14a-8(i)(10) of a proposal requesting a report assessing human rights risks of the company’s operations, including the principles and methodology used to make the assessment, the frequency of assessment and how the company would use the assessment’s results, where the company had a code of ethics and a code of conduct for suppliers and disclosed on its website the frequency and methodology of its human rights risk assessments); *MGM Resorts Int’l* (Feb. 28, 2012) (permitting exclusion under Rule 14a-8(i)(10) of a proposal requesting a report on the

* Citations marked with an asterisk indicate Staff decisions issued without a letter.

company's sustainability policies and performance, including multiple objective statistical indicators, where the company published an annual sustainability report); *Exelon Corp.* (Feb. 26, 2010) (permitting exclusion under Rule 14a-8(i)(10) of a proposal requesting a report disclosing policies and procedures for political contributions and monetary and non-monetary political contributions where the company had adopted corporate political contributions guidelines).

In this instance, Pfizer has substantially implemented the Proposal, the essential objective of which is to report on Pfizer's approach to COVID-19 vaccine and therapeutic pricing. In particular, the Proposal requests a report on how public funding for the development and manufacture of vaccines and therapeutics for COVID-19 may influence Pfizer's pricing decision for those products.

Pfizer already has published information on its approach to COVID-19 vaccine and therapeutic pricing. In this regard, Pfizer maintains a portion of its corporate website dedicated to providing updates on its COVID-19 related initiatives and statements, including a webpage titled "Coronavirus COVID-19 Vaccine Update: Latest Developments," which provides information detailing its pricing approach. These public disclosures address the underlying concerns and essential objectives of the Proposal. Specifically, as disclosed on Pfizer's website, Pfizer's COVID-19 vaccine development and manufacturing costs are entirely self-funded, with billions of dollars already invested in an effort to help find a solution to the pandemic. In addition, Pfizer has explained that its COVID-19 vaccine will be priced "in a way to help governments ensure there is little to no out-of-pocket cost for the vaccine for their populations."³ Among other efforts, Pfizer has supported the plans of the U.S. and other governments to procure the vaccine on behalf of their citizens in order to ensure that the vaccine is provided free of charge. In fact, Pfizer has stated "Americans will receive the vaccine for free consistent with [the] U.S. government's commitment for free access for COVID-19 vaccines." In this regard, Pfizer and its business partner, BioNTech, committed to sell to the U.S. government, following U.S. Food and Drug Administration authorization or approval, 100 million doses of their COVID-19 vaccine for \$1.95 billion and up to an additional 500 million doses.⁴ Accordingly, Pfizer has reported on its approach to pricing COVID-19 vaccines and therapeutics, taking into account any public funding for the development and manufacture of those products.

Consistent with the precedent described above, Pfizer's public disclosures already have satisfied the essential objective of the Proposal by explaining how Pfizer will price its

³ See "Access to a Vaccine, Once Approved—How much will the vaccine cost?" under the "Frequently Asked Questions" tab on *Coronavirus COVID-19 Vaccine Update: Latest Developments*, available at <https://www.pfizer.com/science/coronavirus/vaccine> and attached hereto as Exhibit D.

⁴ See *Pfizer and BioNTech Announce an Agreement with U.S. Government for up to 600 Million Doses of mRNA-based Vaccine Candidate Against SARS-CoV-2*, available at <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-announce-agreement-us-government-600> and attached hereto as Exhibit E.

COVID-19 vaccines and therapeutics. Moreover, public disclosures on Pfizer's corporate website compare favorably with the guidelines of the Proposal, as those disclosures provided details on the funding source for the development and manufacture of Pfizer's COVID-19 vaccine and how Pfizer and its business partner will approach pricing for the vaccine. Thus, Pfizer has substantially implemented the Proposal.

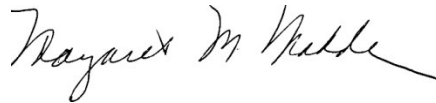
Accordingly, the Proposal should be excluded from Pfizer's 2021 proxy materials pursuant to Rule 14a-8(i)(10) as substantially implemented.

VI. Conclusion

Based upon the foregoing analysis, we respectfully request that the Staff concur that it will take no action if Pfizer excludes the Proposal from its 2021 proxy materials.

Should the Staff disagree with the conclusions set forth in this letter, or should any additional information be desired in support of Pfizer's position, we would appreciate the opportunity to confer with the Staff concerning these matters prior to the issuance of the Staff's response. Please do not hesitate to contact me at (212) 733-3451 or Marc S. Gerber of Skadden, Arps, Slate, Meagher & Flom LLP at (202) 371-7233.

Very truly yours,



Margaret M. Madden

Enclosures

cc: Catherine Rowan
Director, Socially Responsible Investments
Trinity Health

Judy Byron, OP
Adrian Dominican Sisters
PeaceHealth

Mary Beth Gallagher
Socially Responsible Investing Consultant, Investor Advocates for Social Justice
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Rose Marie Stallbaumer, OSB
Investment Representative
Monasterio De San Benito

Ramona Bezner, CDP
Trustee
Providence Trust

Gwen Farry, BVM
Sisters of Charity of the Blessed Virgin Mary

EXHIBIT A

(see attached)



Catherine M. Rowan
Director, Socially Responsible Investments
766 Brady Avenue, Apt. 635
Bronx, NY 10462
Phone: (718) 822-0820
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E-Mail Address: rowan@bestweb.net

November 5, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Dear Ms. Madden,

Trinity Health is the beneficial owner of over \$2,000 worth of stock in Pfizer, Inc. Trinity Health has held these shares continuously for over twelve months and will continue to do so at least until after the next annual meeting of shareholders. A letter of verification of ownership is enclosed.

I am authorized to notify you of our intention to present the attached proposal for consideration and action by the stockholders at the next annual meeting. I submit this resolution for inclusion in the proxy statement, in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934.

As the representative for Trinity Health, I am the primary contact for this shareholder proposal and intend to present it in person or by proxy at the next annual meeting of the Company. Other Pfizer shareholders may be co-filing this same proposal as well.

Thank you for your attention to our concerns and look forward to speaking with you at your convenience. We appreciate the ongoing shareholder dialogue we have with the Company, and we hope that submission of this proposal will lead to greater transparency regarding the issues our proposal raises.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Rowan".

Catherine Rowan

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RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

SUPPORTING STATEMENT

Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority (“BARDA”) and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech’s vaccine as part of the Operation Warp Speed (“OWS”) program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal

¹ <https://federallabs.org/news/barda-dod-engage-pfizer-for-millions-of-covid-19-vaccine-doses>

² See <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.24.3.653>

³ https://www.citizen.org/article/the-peoples-vaccine/#_fn44

⁴ See <https://www.usatoday.com/story/news/2020/07/20/covid-19-vaccine-house-hearing-non-profit-low-price-possible/5475329002/>

⁵ <https://www.biopharmadive.com/news/moderna-coronavirus-vaccine-price-dose/582947/>

⁶ <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-supply-japan-120-million-doses-their>

and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

⁷ <https://www.wsj.com/articles/covid-19-vaccine-deployment-would-give-global-economy-a-lift-next-year-11601820001>

⁸ See

<https://www.americanprogress.org/issues/healthcare/reports/2020/07/28/488196/comprehensive-covid-19-vaccine-plan/>

⁹

https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines



The Northern Trust Company
50 South LaSalle Street
Chicago, Illinois 60603

November 5, 2020

TO WHOM IT MAY CONCERN,

Please accept this letter as verification that as of November 5, 2020 Northern Trust as custodian held for the beneficial interest of Trinity Health 324,260 shares of Pfizer, Inc..

As of November 5, 2020 Trinity Health has held at least \$2,000 worth of Pfizer, Inc. continuously for over one year. Trinity Health has informed us it intends to continue to hold these shares through the date of the company's next annual meeting.

This letter is to confirm that the aforementioned shares of stock are registered with Northern Trust, Participant Number 2669, at the Depository Trust Company.

Sincerely,

Ryan Stack
2nd Vice President
The Northern Trust Company
50 South La Salle Street
Chicago, Illinois 60603

EXHIBIT B

(see attached)



ADRIAN DOMINICAN SISTERS
1257 East Siena Heights Drive
Adrian, Michigan 49221-1793
517-266-3400 Phone

Portfolio Advisory Board

November 6, 2020

Margaret M. Madden
VP, Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Dear Ms. Madden,

In an effort to ensure widespread access to treatments and vaccines for COVID-19, the Adrian Dominican Sisters request the Board of Pfizer to report on how receipt by Pfizer, or its business partners, of public financial support for development and manufacture of a vaccine or therapeutics will be taken into account when making decisions that affect access, such as setting prices.

The Adrian Dominican Sisters is co-filing the enclosed resolution with Trinity Health for inclusion in the 2021 proxy statement in accordance with rule 14a-8 of the general rules and regulations of the Securities and Exchange Act of 1934. A representative of the filers will attend the annual meeting to move the resolution as required by SEC Rules.

As of November 6, 2020 the Adrian Dominican Sisters held, and has held continuously for at least one year, 87 shares of Pfizer, Inc. common stock. A letter verifying ownership in the Company is enclosed. We will continue to hold the required number of shares in Pfizer, Inc. through the annual meeting in 2021.

For matters pertaining to this resolution, please contact Catherine Rowan who represents Trinity Health, the primary filer of this resolution. Please copy Judy Byron, OP on all communications:
jbyron@ipjc.org

Sincerely,

Frances Nadolny, OP
Administrator
Adrian Dominican Sisters

Encl: Shareholder Resolution
Verification of Ownership

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

SUPPORTING STATEMENT

Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority (“BARDA”) and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech’s vaccine as part of the Operation Warp Speed (“OWS”) program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

¹ <https://federallabs.org/news/barda-dod-engage-pfizer-for-millions-of-covid-19-vaccine-doses>

² See <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.24.3.653>

³ https://www.citizen.org/article/the-peoples-vaccine/#_ftn44

⁴ See <https://www.usatoday.com/story/news/2020/07/20/covid-19-vaccine-house-hearing-non-profit-low-price-possible/5475329002/>

⁵ <https://www.biopharmadive.com/news/moderna-coronavirus-vaccine-price-dose/582947/>

If Pfizer's vaccine is approved, scaling up production beyond the Company's own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

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⁹

https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines

November 6, 2020

Margaret M. Madden
Vice President, Corporate
Secretary, Chief Governance
Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

RE: Adrian Dominican Sisters Account at Comerica

Dear Margaret M. Madden,

Regarding the request for verification of holdings, the above referenced account currently holds 87.00 units of Pfizer, Inc. common stock.

The attached tax lot detail indicates the date the stock was acquired.

Also, please note that Comerica, Inc is a DTC participant.

Please do not hesitate to contact me with any questions.

Sincerely,



Beverly V. Jones
Senior Trust Analyst
Comerica Bank
411 W. Lafayette Boulevard
MC 3462
Detroit, Michigan 48226
P: 313.222.9874
Bvjones@comerica.com



1075 First Avenue
King of Prussia, PA 19406

www.abhms.org
www.judsonpress.com
888-79-ABHMS

November 11, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703
Via mail and email: Margaret.M.Madden@Pfizer.com

Dear Ms. Madden:

American Baptist Home Mission Societies (ABHMS) considers social, environmental, and financial factors in our investment decisions. One of our responsible investing priorities is to promote equitable access to medicines. As investors in Pfizer, we seek to ensure that Pfizer is leveraging public funding to promote equitable access to the COVID-19 vaccine and therapeutics under development.

ABHMS is the beneficial owner of 203 shares/\$7,795 in Pfizer, Inc. ABHMS has held these shares continuously for over twelve months and will continue to do so at least until after the next annual meeting of shareholders. A letter of verification of ownership is enclosed.

I am authorized to notify you of our intention to co-file the attached proposal on Public Investment in COVID-19 Products for consideration and action by the stockholders at the next annual meeting. I submit this resolution for inclusion in the proxy statement, in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934.

Trinity Health is the primary filer of this resolution. If an agreement is reached, Cathy Rowan of Trinity Health is authorized to withdraw the resolution on our behalf.

As a co-filer I respectfully request direct communication from the company and to be listed in the proxy. Please address all communication regarding this resolution to our Socially Responsible Investing Consultant Mary Beth Gallagher of Investor Advocates for Social Justice located at 40 South Fullerton Ave, Montclair, NJ 07042, email address: mbgallagher@iasj.org and phone number (973) 509-8800. We look forward to constructive dialogue with you and your colleagues about these concerns.

Sincerely,

David L. Moore Jr, CFA
Director of Investments

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

SUPPORTING STATEMENT

Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority (“BARDA”) and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech’s vaccine as part of the Operation Warp Speed (“OWS”) program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal

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and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

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⁹

https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines



November 11, 2020

Mr. David Moore
American Baptist Home Mission Societies
1075 First Avenue
King of Prussia, Pa. 19406

Re: American Baptist Home Mission Societies

ABMF30A5002

Dear Mr. David Moore,

As of and including November 11, 2020, the American Baptists Home Mission Society held, and has held continuously for at least one year, 203 shares of Pfizer Inc. We have been directed by the shareowners to place a hold on this stock at least until the next annual meeting.

This security is currently held by Mellon Trust, Master Custodian, for the American Baptist Home Mission Societies in our nominee name at Depository Trust Company.

Please contact me directly at 412-234-7122 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Jules Selia".

Jules Selia
Global Client Administration
BNY Mellon



November 9, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Dear Ms. Madden,

CommonSpirit Health is a nonprofit, Catholic health system dedicated to advancing health for all people. With a team of approximately 125,000 employees and 25,000 physicians and advanced practice clinicians, CommonSpirit Health operates 137 hospitals and more than 1000 care sites across 21 states.

As a religiously sponsored organization, CommonSpirit seeks to reflect its mission, vision and values in its investment decisions. As one of the nation's largest health care providers, we have seen the devastating impacts of COVID-19 on an extraordinary scale. It is in the best interest of all that any vaccine be both accessible and affordable, and we have specific concerns that any government funded research and development reflect a commitment to achieving these goals.

Through this letter we notify the company of our intention to co-file the enclosed resolution, the primary filer of which is Trinity Health. CommonSpirit is the beneficial owner of more than \$2,000 worth of stock in Pfizer, Inc. CommonSpirit has held these shares continuously for over twelve months and will continue to do so at least until after the next annual meeting of shareholders. A letter of verification of ownership is enclosed.

I am authorized to notify you of our intention to present the attached proposal for consideration and action by the stockholders at the next annual meeting. I submit this resolution for inclusion in the proxy statement, in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934.

Trinity Health as lead filer is authorized to negotiate on behalf of CommonSpirit Health any potential withdrawal of this proposal. Please direct any correspondence relating to this filing to Catherine Rowan, Director, Socially Responsible Investments, Trinity Health.

It is our tradition and preference as a religiously sponsored organization to participate in dialogue with companies and we appreciate the Company's commitment to this ongoing engagement. Thank you for

your attention to our concerns. We hope that submission of this proposal will lead to greater transparency regarding the issues our proposal raises.

Sincerely,

A handwritten signature in blue ink that reads "Laura Krausa". The signature is fluid and cursive, with the first name "Laura" being more prominent than the last name "Krausa".

Laura Krausa, MNM

System Director Advocacy Programs

Attachments: Shareholder Resolution, Verification of Ownership

CC: Catherin Rowan, Director, Socially Responsible Investments; Julie Wokaty, Interfaith Center on Corporate Responsibility

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

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November 9, 2020

Mr. Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel Pfizer, Inc.
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Re: CommonSpirit Health

Dear Margaret,

This letter will certify that as of November 9, 2020, Northern Trust held for the beneficial interest of CommonSpirit Health, 130 shares of Pfizer, Inc.

We confirm that CommonSpirit Health, has beneficial ownership of at least \$2,000 in market value of the voting securities of Pfizer, Inc. and that such beneficial ownership has existed continuously for at least one year, including a one year period preceding and including November 9, 2020, in accordance with rule 14a-8 of the Securities Exchange Act of 1934.

Further, it is CommonSpirit Health, intent to hold at least \$2,000 in market value through the next annual meeting.

Please be advised, Northern Trust is a DTC Participant, whose DTC number is 2669.

If you have any questions please feel free to give me a call.

Sincerely,

Jennifer W. Beattie
Senior Vice President
The Northern Trust Company

CONGREGATION OF DIVINE PROVIDENCE
SAN ANTONIO, TEXAS

November 10, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Email: Margaret.M.Madden@Pfizer.com

Dear Ms. Madden:

I am writing you on behalf of the Congregation of Divine Providence to co-file the stockholder resolution on Access to COVID-19 Products. In brief, the proposal states: **RESOLVED**, that shareholders of Pfizer Inc. ("Pfizer" or the "Company") ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

I am hereby authorized to notify you of our intention to co-file this shareholder proposal with Trinity Health. I submit it for inclusion in the 2021 proxy statement for consideration and action by the shareholders at the 2021 annual meeting in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934. We are the beneficial owner, as defined in Rule 13d-3 of the Securities Exchange Act of 1934, of \$2,000 worth of the shares.

We have been a continuous shareholder for one year of \$2,000 in market value of Pfizer, Inc. stock and will continue to hold at least \$2,000 of Pfizer, Inc. stock through the next annual meeting. Verification of our ownership position will be sent by our custodian. A representative of the filers will attend the stockholders' meeting to move the resolution as required by SEC rules.

We truly hope that the company will be willing to dialogue with the filers about this proposal. We consider Trinity Health the lead filer of this resolution. As such, Trinity Health, serving as the primary filer, is authorized to act on our behalf in all aspects of the resolution, including negotiation and deputize them to withdraw the resolution on our behalf if an agreement is reached. Please note that the contact person for this resolution/proposal will be Cathy Rowan, of Trinity Health who may be reached by phone 718-822-0820 or by email: rowan@bestweb.net.

As a co-filer, however, we respectfully request direct communication from the company and to be listed in the proxy.

Sincerely,



Sister Patricia Regan, CDP
General Treasurer

2021 Pfizer, Inc. Access to COVID-19 Products

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

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⁹ https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines

The Quantitative Group
755 E Mulberry Ave
Suite 300
San Antonio, TX 78212
tel 210 277 4400
fax 210 735 1150
toll free 800 733 1150

Graystone
ConsultingSM

November 10, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 E 42nd St
NY, NY 10017-5703

Email: Margaret.m.madden@pfizer

Re: Co-filing of shareholder resolution: Access to COVIC-19 Products

As of November 10, 2020, Congregation of Divine Providence held and has held continuously for at least one year, 101 shares of Pfizer Inc Common Stock. These shares have been held with Morgan Stanley DTC 0015. If you need further information, please contact Laurie Georgeff at (210) 366-6645.

Sincerely,



Laurie Georgeff
Institutional Consulting Associate



November 6, 2020

Margaret M. Madden
Senior Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5755

Dear Ms. Madden:

Mercy Investment Services, Inc. ("Mercy"), as the investment program of the Sisters of Mercy of the Americas, has long been concerned not only with the financial returns of its investments, but also with their social and ethical implications. We believe that a demonstrated corporate responsibility in matters of the environment, and social and governance concerns fosters long-term business success. Mercy, a long-term investor, is currently the beneficial owner of shares of Pfizer, Inc.

Mercy is filing the enclosed proposal to request the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

Mercy is co-filing the shareholder proposal with Trinity Health for inclusion in the 2021 proxy statement, in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934. Mercy has been a shareholder continuously for more than one year holding at least \$2,000 in market value and will continue to invest in at least the requisite number of shares for proxy resolutions through the annual shareholders' meeting. A representative of the filers will attend the Annual Meeting to move the resolution as required by SEC rules. The verification of ownership by our custodian, a DTC participant, is enclosed with this letter. Trinity Health may withdraw the proposal on our behalf. We respectfully request direct communications from Pfizer, Inc., and to have our supporting statement and organization name included in the proxy statement.

We look forward to having productive conversations with the company. Please direct your responses to me via my contact information below.

Best regards,

Lydia Kuykendal
Director of Shareholder Advocacy
317-910-8581

lkuykendal@mercyinvestments.org

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

SUPPORTING STATEMENT

Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority (“BARDA”) and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech’s vaccine as part of the Operation Warp Speed (“OWS”) program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal

¹ <https://federallabs.org/news/barda-dod-engage-pfizer-for-millions-of-covid-19-vaccine-doses>

² See <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.24.3.653>

³ https://www.citizen.org/article/the-peoples-vaccine/#_ftn44

⁴ See <https://www.usatoday.com/story/news/2020/07/20/covid-19-vaccine-house-hearing-non-profit-low-price-possible/5475329002/>

⁵ <https://www.biopharmadive.com/news/moderna-coronavirus-vaccine-price-dose/582947/>

⁶ <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-supply-japan-120-million-doses-their>

and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

⁷ <https://www.wsj.com/articles/covid-19-vaccine-deployment-would-give-global-economy-a-lift-next-year-11601820001>

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⁹

https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines



November 6, 2020

Margaret M. Madden
Senior Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5755

Re: Mercy Investment Services Inc.

Dear Margaret,

This letter will certify that as of November 6, 2020, Northern Trust held for the beneficial interest of Mercy Investment Services Inc., 122 shares of Pfizer. We confirm that Mercy Investment Services Inc. has beneficial ownership of at least \$2,000 in market value of the voting securities of Pfizer, and that such beneficial ownership has existed continuously for at least one year including a one year period preceding and including November 6, 2020, in accordance with rule 14a-8 of the Securities Exchange Act of 1934. Further, it is Mercy Investment Services Inc., intent to hold at least \$2,000 in market value through the next annual meeting.

We also confirm that as of the filing date, November 6, 2020, Mercy Investment Services Inc., held 119,920.00 additional shares of Pfizer with a market value of \$4,365,088.00

Please be advised, Northern Trust is a DTC Participant, whose DTC number is 2669.

If you have any questions please feel free to give me a call.

Sincerely,

Joe Wilimczyk
Officer
312 444 4146



November 9, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703
Margaret.M.Madden@Pfizer.com

Sent via Federal Express and email

Re: Miller/Howard Investments Shareholder Resolution for Pfizer, Inc.

Dear Ms. Madden:

On behalf of shareholder Keith Thompson, Miller/Howard Investments, Inc. (“Miller/Howard”) writes to give notice that, pursuant to the 2020 proxy statement of Pfizer, Inc. (PFE) and Rule 14a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934, Miller/Howard intends to file the attached proposal at the 2021 annual meeting of shareholders. Keith Thompson is the beneficial owner of more than \$2,000 in market value of PFE stock, has continuously held these shares for over one year, and has authorized Miller/Howard to file this proposal on his behalf. In addition, Mr. Thompson intends to hold the shares through the date on which the annual meeting is held. Verification of stock ownership and authorization from Keith Thompson for Miller/Howard to file the proposal will be submitted under separate cover.

Miller/Howard is an employee owned, research driven investment boutique with nearly thirty years of experience managing portfolios for major institutions, mutual funds, and individuals in dividend-focused investment strategies. In addition to financial analysis, we perform rigorous research seeking high-quality companies that are contributing to the economy in meaningful ways and have demonstrated a strong commitment to good governance, the environment, and social responsibility.

Enclosed is Miller/Howard’s shareholder proposal requesting Board of Directors to report on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

Miller/Howard Investments, Inc.

10 Dixon Avenue | Woodstock, NY 12498
(ph) 845.679.9166 | 845.679.5862 (fax)
esg@mhinvest.com | www.mhinvest.com



Margaret M. Madden
Pfizer, Inc.
November 9, 2020
Page 2

Trinity Health is the lead filer of this proposal. Miller/Howard delegates all authority related to negotiations and withdrawal of the proposal to Trinity Health. We are submitting this proposal as co-filers because we strongly believe it is in the best interests of the company and its shareholders. We welcome a discussion on this important issue.

Please contact Catherine Rowan at Trinity Health for any matters related to this proposal and please also copy Miller/Howard. Please note that we are currently working remotely due to the COVID-19 pandemic. Please send a copy of all correspondence relating to this proposal to esg@mhinvest.com, as we may not be able to retrieve hard copies sent to our office in a timely manner.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia Seabrook', written over a light blue horizontal line.

Patricia Karr Seabrook
Shareholder Advocacy Coordinator
Miller/Howard Investments, Inc.
esg@mhinvest.com

Enclosure

cc: Trinity Health: Catherine Rowan, Director, Socially Responsible Investments: rowan@bestweb.net
Miller/Howard Investments, Inc.: Nicole Lee, Director ESG Research: nicole@mhinvest.com

Miller/Howard Investments, Inc.
10 Dixon Avenue | Woodstock, NY 12498
(ph) 845.679.9166 | 845.679.5862 (fax)
esg@mhinvest.com | www.mhinvest.com

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

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If Pfizer's vaccine is approved, scaling up production beyond the Company's own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

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⁸ See

<https://www.americanprogress.org/issues/healthcare/reports/2020/07/28/488196/comprehensive-covid-19-vaccine-plan/>

⁹

https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines



November 9, 2020

Luan Jenifer
President
Miller/Howard Investments, Inc.
10 Dixon Avenue
Woodstock, NY 12498

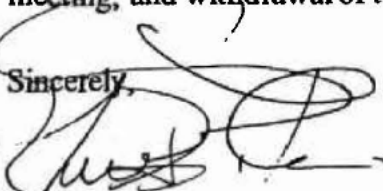
Dear Ms. Jenifer:

This letter is to confirm that I authorize Miller/Howard Investments, Inc. to file a shareholder resolution on my behalf at Pfizer, Inc. regarding vaccine access and pricing at the 2021 annual meeting of shareholders.

This letter confirms that as of November 9, 2020, I was a record investor holding shares of Pfizer, Inc. Common Stock. This letter also confirms that I have held these shares continuously in excess of \$2,000 in market value for at least twelve months prior to November 9, 2020, and that I will continue to hold sufficient shares through the date of the Annual Shareholders' Meeting in 2021.

I give Miller/Howard Investments, Inc. the authority to deal on my behalf with any and all aspects of the shareholder resolution, including but not limited to presentation at the annual meeting, and withdrawal of the resolution.

Sincerely,



Keith Thompson
Division Director – East
Miller/Howard Investments, Inc.

cc: Miller/Howard Investments: patricia@mhinvest.com; nicole@mhinvest.com; and
esg@mhinvest.com

Miller/Howard Investments, Inc.
10 Dixon Avenue | Woodstock, NY 12498
(ph) 845.679.9166 | 845-679-5862 (fax)
esg@mhinvest.com | www.mhinvest.com



November 23, 2020

Luan Jenifer
President
Miller/Howard Investments, Inc.
10 Dixon Avenue
Woodstock, NY 12498

Account number ending in:

****_* **

Questions: Contact your advisor or
call Schwab Alliance at
1-800-515-2157.

As requested, we're confirming a stock holding in your account.

Miller/Howard 401K PSP and Trust FBO Keith Thompson,

As requested, we're writing to confirm that the above account holds in trust shares with a market value in excess of \$2,000 of shares of Pfizer, Inc. (PFE) common stock. These shares have been held in the account continuously for at least one year since November 9, 2020.

These shares are held at Depository Trust Company under Charles Schwab & Co., Inc., which serves as custodian for the account.

Thank you for choosing Schwab. If you have questions, please contact your advisor or Schwab Alliance at 1-800-515-2157. We appreciate your business and look forward to serving you in the future.

Sincerely,

Michael Baird

Michael Baird
Manager
Advisor Services
9800 Schwab Way
Englewood, CO 80112-3441

Independent investment advisors are not owned by, affiliated with, or supervised by Charles Schwab & Co., Inc. ("Schwab").



Monasterio De San Benito

Rio Bamba 870

Colonia Liindavista

07300 Mexico, D.F. Mexico

November 11, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Email: Margaret.M.Madden@Pfizer.com

Dear Ms. Madden:

I am writing you on behalf of Monasterio De San Benito to co-file the stockholder resolution on Access to COVID-19 Products. In brief, the proposal states: **RESOLVED**, that shareholders of Pfizer Inc. ("Pfizer" or the "Company") ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

I am hereby authorized to notify you of our intention to co-file this shareholder proposal with Trinity Health. I submit it for inclusion in the 2021 proxy statement for consideration and action by the shareholders at the 2021 annual meeting in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934. We are the beneficial owner, as defined in Rule 13d-3 of the Securities Exchange Act of 1934, of 300 shares of Pfizer, Inc. or \$2,000 worth of the shares.

We have been a continuous shareholder for one year of \$2,000 in market value of Pfizer, Inc. stock and will continue to hold at least \$2,000 of Pfizer, Inc. stock through the next annual meeting. Verification of our ownership position will be sent by our custodian. A representative of the filers will attend the stockholders' meeting to move the resolution as required by SEC rules.

We truly hope that the company will be willing to dialogue with the filers about this proposal. We consider Trinity Health the lead filer of this resolution. As such, Trinity Health, serving as the primary filer, is authorized to act on our behalf in all aspects of the resolution, including negotiation and deputize them to withdraw the resolution on our behalf if an agreement is reached. Please note that the contact person for this resolution/proposal will be Cathy Rowan, of Trinity Health who may be reached by phone 718-822-0820 or by email: rowan@bestweb.net.

As a co-filer, however, we respectfully request direct communication from the company and to be listed in the proxy.

Sincerely,

Rose Marie Stallbaumer, OSB, Investment Representative

2021 Pfizer, Inc. Access to COVID-19 Products

RESOLVED that shareholders of Pfizer Inc. ("Pfizer" or the "Company") ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

SUPPORTING STATEMENT

Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority ("BARDA") and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech's vaccine as part of the Operation Warp Speed ("OWS") program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer's reputation and create regulatory risk for the Company. An industry publication recently noted that "[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development."⁵ Pfizer has often been criticized for high drug prices.

If Pfizer's vaccine is approved, scaling up production beyond the Company's own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

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² See <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.24.3.653>

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⁹ https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines



November 9, 2020

BY EMAIL AND DELIVERY

Margaret Madden
Vice President and Corporate Secretary, Chief Governance Counsel
235 East 42nd Street
New York, NY 10017
Email: Margaret.M.Madden@Pfizer.com

Re: Shareholder proposal for 2021 Annual Shareholder Meeting

Dear Ms. Madden,

Oxfam America, Inc. ("**Oxfam America**") hereby co-files a shareholder proposal submitted by lead filer Trinity Health in accordance with SEC Rule 14a-8, to be included in the proxy statement of Pfizer (the "**Company**") for its 2021 annual meeting of shareholders.

Oxfam America has continuously held, for at least one year as of the date hereof, 114 shares of the **Company's common stock to meet the requirements of Rule 14a-8** of the general rules and regulations of the Securities and Exchange Act of 1934, as amended. Oxfam America intends to continue to hold **such shares through the date of the Company's 2021** annual meeting of shareholders.

Trinity Health is the lead filer for this proposal and is authorized to negotiate on behalf of Oxfam America any potential withdrawal of this proposal.

We welcome the opportunity to discuss this proposal with representatives of the Company. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "N. Lusiani".

Nicholas J. Lusiani
Senior Advisor, Private Sector Department
Oxfam America

[Enclosure]

CC: Suzanne Rolon, Director, Corporate Governance
Caroline Roan, Vice President, Global Health & Patient Access

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority (“BARDA”) and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech’s vaccine as part of the Operation Warp Speed (“OWS”) program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the

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November 6, 2020

Pfizer, Inc.
Margaret M. Madden
VP, Corporate Secretary, Chief Governance Counsel
235 East 42nd Street
New York, NY 10017-5703

Dear Ms. Madden:

In an effort to ensure widespread access to treatments and vaccines for COVID-19, PeaceHealth requests the Board of Pfizer to report on how receipt by Pfizer, or its business partners, of public financial support for development and manufacture of a vaccine or therapeutics will be taken into account when making decisions that affect access, such as setting prices.

Therefore, PeaceHealth is co-filing the enclosed resolution with Trinity Health for inclusion in the 2021 proxy statement in accordance with rule 14a-8 of the general rules and regulations of the Securities and Exchange Act of 1934. A representative of the filers will attend the annual meeting to move the resolution as required by SEC Rules.

As of November 6, 2020 PeaceHealth held, and has held continuously for at least one year, 66.985 shares of Pfizer Inc. common stock. A letter verifying ownership in the Company is enclosed. We will continue to hold the required number of shares in Pfizer Inc. through the annual meeting in 2021.

For matters pertaining to this resolution, please contact Catherine Rowan who represents Trinity Health, the primary filer of this resolution. Please copy Judy Byron, OP on all communications: [jbyron@ipic.org/](mailto:jbyron@ipic.org)

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Seirer", with a long horizontal flourish extending to the right.

Jeff Seirer
PeaceHealth System VP Financial Integrity / Controller

Encl: Shareholder Resolution
Verification of Ownership

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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⁵ <https://www.biopharmadive.com/news/moderna-coronavirus-vaccine-price-dose/582947/>

If Pfizer's vaccine is approved, scaling up production beyond the Company's own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

⁶ <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-supply-japan-120-million-doses-their>

⁷ <https://www.wsj.com/articles/covid-19-vaccine-deployment-would-give-global-economy-a-lift-next-year-11601820001>

⁸ See

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100 Vanguard Boulevard
Malvern, PA 19355

November 6, 2020

Margaret M. Madden
Vice President, Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Ms. Madden:

This letter is to verify that PeaceHealth owns 66.985 shares of Pfizer, Inc. common stock. Furthermore, PeaceHealth has held these shares continuously since the acquisition date of 10/17/2017, up to and including the date of 11/6/2020. PeaceHealth will continue to hold at least the minimum number of shares required through the time of the company's next annual meeting.

This security is currently held by Vanguard who serves as custodian for PeaceHealth. The shares are registered in our nominee name at the Vanguard Group. Please note that the Vanguard Group is a DTC participant.

Sincerely,

Todd Feld

Todd Feld, Senior Relationship Manager
Vanguard Institutional NonProfit

PROVIDENCE TRUST

SAN ANTONIO, TEXAS

November 10, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Email: Margaret.M.Madden@Pfizer.com

Dear Ms. Madden:

I am writing you on behalf of Providence Trust to co-file the stockholder resolution on Access to COVID-19 Products. In brief, the proposal states: **RESOLVED**, that shareholders of Pfizer Inc. ("Pfizer" or the "Company") ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

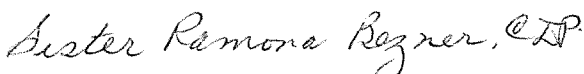
I am hereby authorized to notify you of our intention to co-file this shareholder proposal with Trinity Health. I submit it for inclusion in the 2021 proxy statement for consideration and action by the shareholders at the 2021 annual meeting in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934. We are the beneficial owner, as defined in Rule 13d-3 of the Securities Exchange Act of 1934, of \$2,000 worth of the shares.

We have been a continuous shareholder for one year of \$2,000 in market value of Pfizer, Inc. stock and will continue to hold at least \$2,000 of Pfizer, Inc. stock through the next annual meeting. Verification of our ownership position will be sent by our custodian. A representative of the filers will attend the stockholders' meeting to move the resolution as required by SEC rules.

We truly hope that the company will be willing to dialogue with the filers about this proposal. We consider Trinity Health the lead filer of this resolution. As such, Trinity Health, serving as the primary filer, is authorized to act on our behalf in all aspects of the resolution, including negotiation and deputize them to withdraw the resolution on our behalf if an agreement is reached. Please note that the contact person for this resolution/proposal will be Cathy Rowan, of Trinity Health who may be reached by phone 718-822-0820 or by email: rowan@bestweb.net.

As a co-filer, however, we respectfully request direct communication from the company and to be listed in the proxy.

Sincerely,



Sister Ramona Bezner, CDP
Trustee

2021 Pfizer, Inc. Access to COVID-19 Products

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

SUPPORTING STATEMENT

Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority (“BARDA”) and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech’s vaccine as part of the Operation Warp Speed (“OWS”) program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

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² See <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.24.3.653>

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⁴ See <https://www.usatoday.com/story/news/2020/07/20/covid-19-vaccine-house-hearing-non-profit-low-price-possible/5475329002/>

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⁹ https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines

The Quantitative Group
755 E Mulberry Ave
Suite 300
San Antonio, TX 78212
tel 210 277 4400
fax 210 735 1150
toll free 800 733 1150

Graystone
ConsultingSM

November 10, 2020

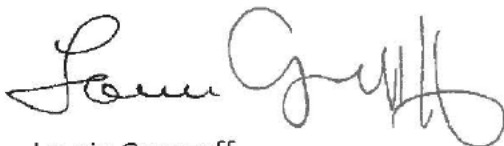
Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 E 42nd St
NY, NY 10017-5703

Email: Margaret.m.madden@pfizer

Re: Co-filling of shareholder resolution: Access to COVID-19 Products

As of November 10, 2020, Providence Trust held and has held continuously for at least one year, 257 shares of Pfizer Inc Common Stock. These shares have been held with Morgan Stanley DTC 0015. If you need further information, please contact Laurie Georgeff at (210) 366-6645.

Sincerely,



Laurie Georgeff
Institutional Consulting Associate

November 6, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Dear Ms. Madden,

Reynders, McVeigh Capital Management, LLC holds 51,208.863 shares of Pfizer, Inc. stock. We are a socially responsible wealth management firm in Boston working with high net worth individuals and families. We manage \$2.7 billion in assets. As global citizens we encourage corporations to be responsible and transparent. Shareholder engagement is one avenue to push companies to be accountable to shareholders and the greater global community. We are filing, in cooperation with Trinity Health, the enclosed shareholder proposal for consideration at your 2021 Annual Meeting. In brief, the proposal requests equitable access to your COVID vaccine.

We are filing the enclosed shareholder proposal for inclusion in the 2021 proxy statement, in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934. Reynders, McVeigh Capital Management, LLC has continuously held Pfizer, Inc. shares totaling at least \$2,000 in market value for at least one year prior to the date of this filing. Proof of ownership is enclosed. Reynders, McVeigh Capital Management, LLC will maintain the required ownership of Pfizer, Inc. stock though the 2021 Annual Meeting. A representative of the filers will attend the Annual Meeting to move the resolution as required by SEC rules. In future communications with Pfizer, Inc., Reynders, McVeigh Capital Management, LLC will be represented by Trinity Health.

We at Reynders, McVeigh Capital Management, LLC believe companies that lead on transparency, including environmental, social and corporate governance matters, are better positioned to provide long-term shareholder value. If you have any questions concerning this resolution, please feel free to reach out.

Sincerely,



Maria Demetra Egan
Vice President & Director of Shareholder Engagement
617-226-9999
maria@reyndersmcveigh.com

CC: Catherine Rowan

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal and low-cost vaccine access, which is critical to maintain stability, reignite the

¹ <https://federallabs.org/news/barda-dod-engage-pfizer-for-millions-of-covid-19-vaccine-doses>

² See <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.24.3.653>

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global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

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⁹ https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines



Fidelity Clearing & Custody Solutions®

100 Crosby Parkway KCIJ
Covington, KY 41015

November 06, 2020

Reynders Mcveigh Capital Management
121 High St. Fl. 501
Boston, MA 02110-2416

To Whom It May Concern:

I am the Primary Client Manager at Fidelity Investments for Reynders McVeigh Capital Management/ Fresh Pond Capital ("Reynders").

Please accept this letter as confirmation that at the close of business on November 5, 2020 there were 51,208.863 of Pfizer (PFE) held by Reynders' clients at Fidelity Investments. Furthermore, our records confirm that the shares of PFE with a value in excess of \$1.8 Million have been continuously held with Fidelity Investments from the close of business on November 5, 2019 to the date of this letter.

I hope you find this information helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur Decosta".

Arthur Decosta
Client Services Manager

Our file: W738215-06NOV20

200 Seaport Boulevard, Boston, MA 02210

Fidelity Clearing & Custody Solutions® provides clearing, custody, or other brokerage services through National Financial Services LLC or Fidelity Brokerage Services LLC, Members NYSE, SIPC.

526665.6.0



Shareholder Education & Advocacy
Sisters of Charity, BVM

November 6, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, New York 10017-5703

Dear Ms. Madden,

The Sisters of Charity of the Blessed Virgin Mary (BVM) are the beneficial owner of over \$2,000 worth of stock in Pfizer, Inc. The Sisters of Charity of the Blessed Virgin Mary have held these shares continuously for over twelve months and will continue to do so at least until after the next annual meeting of shareholders. A letter of verification of ownership will follow.

The Sisters of Charity of the Blessed Virgin Mary are co-filing the enclosed shareholder proposal for inclusion in the 2021 proxy statement, in accordance with Rule 14-a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934. A representative of the filers will attend the Annual Meeting to move the proposal, as required by SEC rules.

Please direct your response to me and to the lead filer of this proposal: Catherine Rowen, Director, Socially Responsible Investments, Trinity Health, 766 Brady Avenue, Apt. 635, Bronx, NY 10462.

We look forward to continuing shareholder dialogue with Pfizer, Inc. Thank you for your kind attention to our proposal.

Sincerely,

Gwen Farry, BVM
Sisters of Charity of the Blessed Virgin Mary
1150 Carmel Drive, Dubuque, IA 52003
gfarry@bvmsisters.org
773-263-2628

RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal

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and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

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https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines



November 6, 2020

Margaret M. Madden
Vice-President and Corporate Secretary,
Chief Governance Counsel

Pfizer, Inc.
235 East 42nd Street
New York, New York 10017-5703

RE: 100 shares of Pfizer Inc, PFE

Dear Ms. Madden,

This verifies that the Sisters of Charity, BVM own and hold in street name in their Dubuque Bank and Trust Account 100 shares of Pfizer Inc, PFE common stock. They have owned said shares for more than a year, still owning them as of November 6, 2020, and do not intend to sell them before the annual meeting of said company. The market value of the shares as of November 6, 2020 is \$3,639.00

Dubuque Bank and Trust custodies their assets through SEI Trust Co., where they are held at SPTC nominee name. SPTC is a DTC participant. Enclosed is a page from the 11/6/20 holdings at SEI showing Dubuque Bank & Trust held at least 100 shares of Pfizer Inc, PFE.

If further information is required, please do not hesitate to contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script that reads 'Sarah A. Ross'.

Sarah A. Ross, CFP®, CISP, CTFA
VP and Senior Wealth Advisor

Enclosure

cc: gfarry@bvmsisters.org



THE SISTERS OF ST. FRANCIS OF PHILADELPHIA

November 6, 2020

Margaret M. Madden
Vice President and Corporate Secretary, Chief Governance Counsel
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017-5703

Dear Ms. Madden:

Peace and all good! The Sisters of St. Francis of Philadelphia have been shareholders in Pfizer for several years. As the United States and the entire world await an affordable, accessible, and effective vaccines or therapeutics for COVID-19, it is essential that pharmaceutical companies and governments working on these therapies transparently disclose whether and how public financial support affect access to these products.

As a faith-based investor, I am hereby authorized to notify you of our intention to submit this shareholder proposal with Trinity Health, the primary filer. I submit it for inclusion in the proxy statement for consideration and action by the next stockholders' meeting in accordance with Rule 14-a-8 of the General Rules and the Securities and Exchange Act of 1934. A representative of the filers will attend the shareholder meeting to move the resolution. Please note that the contact person for this resolution will be: Catherine Rowan. She may be reached by phone at 718-8220 or via email at rowan@bestweb.net.

As verification that we are beneficial owners of common stock in Pfizer, I enclose a letter from Northern Trust Company, our portfolio custodian/record holder attesting to the fact. It is our intention to keep these shares in our portfolio continuously through the 2021 shareholder meeting.

Respectfully yours,

Tom McCaney
Associate Director, Corporate Social Responsibility

Enclosures

cc: Julie Wokaty, ICCR

RESOLVED that shareholders of Pfizer Inc. ("Pfizer" or the "Company") ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

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⁹

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50 S. LaSalle Street
Chicago IL 60603

November 6, 2020

To Whom It May Concern:

This letter will confirm that the Sisters of St. Francis of Philadelphia hold **75** shares of **Pfizer Inc. Common Stock (CUSIP : 717081103)**. These shares have been held continuously, for at least a one-year period preceding and including **November 6, 2020** and will continue to be at the time of your next shareholders meeting.

The Northern Trust Company serves as custodian/record holder for the Sisters of St. Francis of Philadelphia. The afore mentioned shares are registered in the nominee name of the Northern Trust Company.

This letter will further verify that Sister Nora M. Nash and/or Thomas McCaney are representatives of the Sisters of St. Francis of Philadelphia and are authorized to act on their behalf.

Sincerely,

A handwritten signature in black ink that reads 'Lisa M. Shaffer'.

Lisa M. Martinez- Shaffer
Second Vice President



November 5, 2020

BY EMAIL AND DELIVERY

Margaret M. Madden
Senior Vice-President and Corporate Secretary
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017

Re: Shareholder proposal for 2021 Annual Shareholder Meeting

Dear Ms. Madden,

The Sisters of Charity of Saint Elizabeth hereby co-files a shareholder proposal submitted by lead filer Trinity Heath, in accordance with SEC Rule 14a-8, to be included in the proxy statement of Pfizer, Inc. (the "Company") for its 2021 annual meeting of shareholders.

The Sisters of Charity of Saint Elizabeth has continuously held, for at least one year as of the date hereof, at least 500 shares of the Company's common stock to meet the requirements of Rule 14a-8 of the general rules and regulations of the Securities and Exchange Act of 1934, as amended. The Sisters of Charity of Saint Elizabeth intends to continue to hold such shares through the date of the Company's 2021 annual meeting of shareholders.

Trinity Health is the lead filer for this proposal and is authorized to negotiate on behalf of The Sisters of Charity of Saint Elizabeth any potential withdrawal of this proposal.

We welcome the opportunity to discuss this proposal with representatives of the Company. Please feel free to contact me with any questions.

Sincerely,

Sister Barbara Aires
Coordinator of Corporate Responsibility

(Enclosure)
SBA/lp



RESOLVED that shareholders of Pfizer Inc. (“Pfizer” or the “Company”) ask the Board of Directors to report to shareholders, at reasonable expense and omitting confidential and proprietary information, on whether and how receipt by Pfizer or its business partners of public financial support for development and manufacture of a vaccine or therapeutics for COVID-19 is being, or will be, taken into account when making decisions that affect access to such products, such as setting prices.

SUPPORTING STATEMENT

Pfizer has benefited from substantial public funding for the development of its COVID-19 vaccine, on which it is partnering with German firm BioNTech.

The Biomedical Advanced Research and Development Authority (“BARDA”) and the Department of Defense have committed nearly \$2 billion in funding for Pfizer and BioNTech’s vaccine as part of the Operation Warp Speed (“OWS”) program. The deal entitles BARDA to 100 million doses and an option to buy 500 million more.¹ Although advance purchase commitments do not directly fund vaccine development, they reduce the risk associated with it.² BioNTech has benefited from significant public funding at several different stages in its development of the mRNA technology used in the vaccine it is developing with Pfizer and received over \$444 million from the German government to accelerate vaccine development and expand manufacturing capacity.³

Unlike fellow OWS participants Janssen and AstraZeneca,⁴ Pfizer has not committed to provide its vaccine on a nonprofit basis during the pandemic. We believe that charging a price perceived as too high could damage Pfizer’s reputation and create regulatory risk for the Company. An industry publication recently noted that “[v]accine pricing has the potential to be controversial, given the urgent health crisis posed by the pandemic as well as the billions of dollars in government funding supporting coronavirus vaccine development.”⁵ Pfizer has often been criticized for high drug prices.

If Pfizer’s vaccine is approved, scaling up production beyond the Company’s own goal of producing 1.3 billion doses in 2021⁶ will be essential to ensure universal

¹ <https://federallabs.org/news/barda-dod-engage-pfizer-for-millions-of-covid-19-vaccine-doses>

² See <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.24.3.653>

³ https://www.citizen.org/article/the-peoples-vaccine/#_ftn44

⁴ See <https://www.usatoday.com/story/news/2020/07/20/covid-19-vaccine-house-hearing-non-profit-low-price-possible/5475329002/>

⁵ <https://www.biopharmadive.com/news/moderna-coronavirus-vaccine-price-dose/582947/>

⁶ <https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-supply-japan-120-million-doses-their>

and low-cost vaccine access, which is critical to maintain stability, reignite the global economy and investor returns,⁷ and prevent domestic outbreaks.⁸ Accordingly, Pfizer will face enormous pressure to share intellectual property covering the COVID-19 vaccine which public entities such as BARDA are supporting.

Pfizer's website, which predates the pandemic, describes factors it uses when pricing its medicines, including impact on patients, promoting Pfizer's continued ability to innovate, and the Company's investments in the quality, safety and reliability of its medicines.⁹ It is unclear how those factors would apply in the context of a pandemic in which public support has backed research on underlying technologies and reduced the risks for companies developing products. This Proposal seeks to fill this gap by asking Pfizer to explain whether and how the significant contribution from public entities affects, or will affect, decisions that Pfizer makes that could affect access, such as setting prices.

⁷ <https://www.wsj.com/articles/covid-19-vaccine-deployment-would-give-global-economy-a-lift-next-year-11601820001>

⁸ See <https://www.americanprogress.org/issues/healthcare/reports/2020/07/28/488196/comprehensive-covid-19-vaccine-plan/>

⁹ https://www.pfizer.com/news/featured_stories/featured_stories_detail/how_does_pfizer_price_medicines

November 5th, 2020

Ms. Margaret M. Madden
Senior Vice President and Corporate Secretary
Pfizer, Inc.
235 East 42nd Street
New York, NY 10017

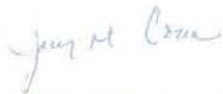
RE: Sisters of Charity of Saint Elizabeth a/c XXXX ***

Dear Corporate Secretary,

This letter alone shall serve as proof of beneficial ownership of 505 shares of Pfizer common stock for the Sisters of Charity of Saint Elizabeth.

Please be advised that as of 11/5/2020, the Sisters of Charity of Saint Elizabeth have continuously held the requisite number of shares of common stock for at least one year, and intend to continue holding the requisite number of shares through the date of the next Annual Meeting of Shareholders.

Sincerely,



Jerry D. Coan | Vice President – Relationship Manager | Institutional Services Group
| 313-222-4562 | Fax: 313-222-7170 | jidcoan@comerica.com | 411 W. Lafayette Blvd. | MC 3462 |
Detroit, MI 48226

EXHIBIT C

(see attached)

July 10, 2018

We are committed to pricing our medicines in a way that reflects the benefit they bring to patients and society, ensuring patients have access and enabling us to continue to invest in new medicines.

- We may consider a number of factors when determining a medicine's price, including, for example: Its impact on patients and their disease, other available treatments, its potential to reduce other health care costs, such as hospital stays, and affordability.
- We may also consider our investments to maintain the quality, safety, and reliability of our medicines, and our ability to continue to innovate to bring new, life-changing medicines and vaccines to patients.
- We may also consult physicians, payers and patient groups, as appropriate. We may also engage with patients, doctors and healthcare plans regarding their views.

We then negotiate with insurers, including PBMs and MCOs, and may provide significant discounts from the initial price.

The price that patients pay for the medicines their physicians prescribe is ultimately set by healthcare providers and insurers.

EXHIBIT D

(see attached)

OUR PROGRESS IN DEVELOPING AN INVESTIGATIONAL COVID-19 VACCINE

[en Español \(/science/coronavirus/vacuna\)](/science/coronavirus/vacuna)

In the fight against COVID-19, a vaccine is a critical part of addressing the global health crisis by decreasing rates of infection, disease and death worldwide. Pfizer and BioNTech are leveraging our decades of scientific expertise and working together to make our investigational COVID-19 vaccine available as quickly and safely as possible. The Phase 3 clinical trial began in late July 2020, recruiting participants aged 12 and over. The clinical trial continues to be open for participants aged 12-15 years to enroll.

After conducting the final efficacy analysis in our Phase 3 study, the mRNA-based COVID-19 vaccine candidate met all of the study's primary efficacy endpoints. Primary efficacy analysis demonstrated the vaccine candidate to be 95% effective against COVID-19 beginning 28 days after the first dose.

On December 11, 2020, the Pfizer-BioNTech COVID-19 vaccine has not been approved or licensed by the U.S. Food and Drug Administration (FDA), but has been authorized for emergency use by FDA under an Emergency Use Authorization (EUA) to prevent Coronavirus Disease 2019 (COVID-19) for use in individuals 16 years of age and older. The emergency use of this product is only authorized for the duration of the declaration that circumstances exist justifying the authorization of emergency use of the medical product under Section 564(b)(1) of the FD&C Act unless the declaration is terminated or authorization revoked sooner. Please see EUA Fact Sheet at www.cvdvaccine.com (<https://www.cvdvaccine.com/>).

Developing an investigational breakthrough vaccine to help prevent COVID-19 is only possible through the dedicated work of thousands of individuals and those who volunteer to take part in research. We are committed to diversity in our clinical trial and ensuring that individuals from communities that have been most affected by COVID-19 have the opportunity to participate.

We are grateful to each of approximately 150 clinical trial investigators and their study teams who are partnering with us in this effort and to all of the participants who have volunteered, and will volunteer, to help make a difference for society.



Latest Updates:

- Pfizer and BioNTech Provide Data from German Phase 1/2 Study Further Characterizing Immune Response Following Immunization with Lead COVID-19 Vaccine Candidate BNT162b2 (/news/press-release/press-release-detail/pfizer-and-biontech-provide-data-german-phase-12-study)
- Pfizer and BioNTech Celebrate Historic First Authorization in the U.S. of Vaccine to Prevent COVID-19 (/news/press-release/press-release-detail/pfizer-and-biontech-celebrate-historic-first-authorization)
- Pfizer and BioNTech Announce Publication of Results from Landmark Phase 3 Trial of BNT162b2 COVID-19 Vaccine Candidate in The New England Journal of Medicine (/news/press-release/press-release-detail/pfizer-and-biontech-announce-publication-results-landmark)

Trial Progress



The clinical trial has enrolled **44,863 participants** and **43,004** have received their **second vaccination** at approximately **150 clinical trial sites** in **6 countries**.



Participant Age



Ages 12-15	697
Ages 16-17	733
Ages 18-55	25,527
Ages 56+	17,893

Updated as of Monday, December 14. Updates are made on a weekly basis.

FREQUENTLY ASKED QUESTIONS

The Investigational Vaccine

The Clinical Trials

Commitment to Safety

Commitment to Diversity

Access to a Vaccine, Once Approved

When is the earliest the vaccine will be available to the public?

On December 11, 2020, the Pfizer-BioNTech COVID-19 vaccine has not been approved or licensed by the U.S. Food and Drug Administration (FDA), but has been authorized for emergency use by FDA under an Emergency Use Authorization (EUA) to prevent Coronavirus Disease 2019 (COVID-19) for use in individuals 16 years of age and older. The emergency use of this product is only authorized for the duration of the declaration that circumstances exist justifying the authorization of emergency use of the medical product under Section 564(b)(1) of the FD&C Act unless the declaration is terminated or authorization revoked sooner. Please see EUA Fact Sheet at www.cvdvaccine.com (<https://www.cvdvaccine.com>).

Who will get the vaccine first, if it is approved?

We are working with governments around the world to provide and distribute our vaccine, if authorized or approved. Those governments and local regulatory authorities are providing the vaccine as they determine is appropriate.

How much will the vaccine cost?

We will price our vaccine in a way to help governments ensure there is little to no out-of-pocket cost for the vaccine for their populations. It is also important to note that our COVID-19 vaccine development and manufacturing costs are entirely self-funded, with billions of dollars already invested in an effort to help find a solution to this pandemic.

DEVELOPMENT MILESTONES

December 10, 2020

Pfizer and BioNTech Announce Publication of Results from Landmark Phase 3 Trial of BNT162b2 COVID-19 Vaccine Candidate in The New England Journal of Medicine

View Press Release (</news/press-release/press-release-detail/pfizer-and-biontech-announce-publication-results-landmark>)

December 2, 2020

Pfizer and BioNTech Achieve First Authorization in the World for a Vaccine to Combat COVID-19

View Press Release (</news/press-release/press-release-detail/pfizer-and-biontech-achieve-first-authorization-world>)

November 11, 2020

Pfizer and BioNTech Receive Emergency Use Authorization for COVID-19 Vaccine

View Press Release (</news/press-release/press-release-detail/pfizer-and-biontech-receive-emergency-use-authorization>)

PREPARING A PANDEMIC VACCINE SUPPLY

In parallel with our vaccine development program, we are working with governments around the world to provide and distribute our vaccine, if approved. You can read more about those efforts in the press releases below:

- July 20: Agreement with the United Kingdom (<https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-announce-agreement-united-kingdom-30>)
- July 22: Agreement with the United States (<https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-announce-agreement-us-government-600>)
- July 31: Agreement with Japan (<https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-supply-japan-120-million-doses-their>)
- August 5: Agreement with Canada (<https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-supply-canada-their-bnt162-mrna-based>)
- September 9: Proposed Agreement with the EU (<https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-potentially-supply-eu-200-million-doses>)
- November 11: Agreement with the EU (<https://www.pfizer.com/news/press-release/press-release-detail/pfizer-and-biontech-reach-agreement-supply-eu-200-million>)

RELATED ARTICLES

Learn more about progress on our path to develop a COVID-19 vaccine.



◀ ALBERT BOURLA DISCUSSES OUR FDA SUBMISSION (/NEWS/HOT-TOPICS/ALBERT_BOURLA_DISCUSSES_OUR_FDA_SUBMISSION)

It is with great pride and joy – and even a little relief – that I can say that our request for Emergency Use Authorization for our potential COVID-19 vaccine is now in the FDA's hands. This is a historic day for science. It took just 248 days to get from the day we announced our plans to...



ALBERT BOURLA DISCUSSES 19 EFFICACY RESULTS (/NEWS/HOT-TOPICS/ALBERT_BOURLA_COVID_19_VACCINE_EFFECTS) ▶

The results demonstrate that our vaccine can help prevent COVID-19 in people who receive it.

For additional information about Pfizer, please see our filings with the U.S. Securities and Exchange Commission, including the information provided in the sections captioned "Risk Factors" and "Forward-Looking Information and Factors That May Affect Future Results".



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The products discussed herein may have different labeling in different countries.

EXHIBIT E

(see attached)

PFIZER AND BIONTECH ANNOUNCE AN AGREEMENT WITH U.S. GOVERNMENT FOR UP TO 600 MILLION DOSES OF MRNA-BASED VACCINE CANDIDATE AGAINST SARS-COV-2

Wednesday, July 22, 2020 - 07:10am

- *U.S. government placed an initial order of 100 million doses for \$1.95 billion and can acquire up to 500 million additional doses*
- *Americans to receive the vaccine for free consistent with U.S. government's commitment for free access for COVID-19 vaccines*
- *Pfizer and BioNTech remain on track to begin an anticipated Phase 2b/3 safety and efficacy trial later this month, seek regulatory review as early as October 2020, and manufacture globally up to 100 million doses by the end of 2020 and potentially more than 1.3 billion doses by the end of 2021*

NEW YORK & MAINZ, Germany--(BUSINESS WIRE)--Pfizer (NYSE: PFE) and BioNTech SE (Nasdaq: BNTX) today announced the execution of an agreement with the U.S. Department of Health and Human Services and the Department of Defense to meet the U.S. government's Operation Warp Speed program goal to begin delivering 300 million doses of a vaccine for COVID-19 in 2021. Under the agreement, the U.S. government will receive 100 million doses of BNT162, the COVID-19 vaccine candidate jointly developed by Pfizer and BioNTech, after Pfizer successfully manufactures and obtains approval or emergency use authorization from U.S. Food and Drug Administration (FDA).

This press release features multimedia. View the full release here:

<https://www.businesswire.com/news/home/20200722005438/en/>
(<https://www.businesswire.com/news/home/20200722005438/en/>)

The U.S. government will pay the companies \$1.95 billion upon the receipt of the first 100 million doses, following FDA authorization or approval. The U.S. government also can acquire up to an additional 500 million doses.

Americans will receive the vaccine for free consistent with U.S. government's commitment for free access for COVID-19 vaccines.

"We've been committed to making the impossible possible by working tirelessly to develop and produce in record time a safe and effective vaccine to help bring an end to this global health crisis," said Dr. Albert Bourla, Pfizer Chairman and CEO. "We made the early decision to begin clinical work and large-scale manufacturing at our own risk to ensure that product would be available

immediately if our clinical trials prove successful and an Emergency Use Authorization is granted. We are honored to be a part of this effort to provide Americans access to protection from this deadly virus.”

“Expanding Operation Warp Speed’s diverse portfolio by adding a vaccine from Pfizer and BioNTech increases the odds that we will have a safe, effective vaccine as soon as the end of this year,” said HHS Secretary Alex Azar. “Depending on success in clinical trials, today’s agreement will enable the delivery of approximately 100 million doses of this vaccine to the American people.”

The BNT162 program is based on BioNTech’s proprietary mRNA technology and supported by Pfizer’s global vaccine development and manufacturing capabilities. The BNT162 vaccine candidates are undergoing clinical studies and are not currently approved for distribution anywhere in the world. BioNTech is the market authorization holder worldwide and will hold all trademarks for the potential product. Both collaborators are committed to developing these novel vaccines with pre-clinical and clinical data at the forefront of all their decision-making.

“We are pleased to have signed this important agreement with the U.S. government to supply the initial 100 million doses upon approval as part of our commitment to address the global health threat. This agreement is one of many steps towards providing global access to a safe and efficacious vaccines for COVID-19. We are also in advanced discussions with multiple other government bodies and we hope to announce additional supply agreements soon. Our goal remains to bring a safe and effective COVID-19 vaccine to many people around the world, as quickly as we can,” said Ugur Sahin, M.D., CEO and Co-founder of BioNTech.

The Pfizer/BioNTech vaccine development program is evaluating at least four experimental vaccines, each of which represents a unique combination of messenger RNA (mRNA) format and target antigen. On July 1st, Pfizer and BioNTech announced preliminary data from BNT162b1, the most advanced of the four mRNA formulations. The early data demonstrates that BNT162b1 is able to produce neutralizing antibodies in humans at or above the levels observed in the plasma from patients who have recovered from COVID-19, and this was shown at relatively low dose levels. Local reactions and systemic events were dose-dependent, generally mild to moderate, and transient. No serious adverse events were reported. On July 20th, the companies announced early positive update from German Phase 1/2 COVID-19 vaccine study, including first T Cell response data.

Recently, two of the companies’ four investigational vaccine candidates (BNT162b1 and BNT162b2) received Fast Track designation from the U.S. Food and Drug Administration (FDA). This designation was granted based on preliminary data from Phase 1/2 studies that are currently ongoing in the United States and Germany as well as animal immunogenicity studies. Further data from the ongoing Phase 1/2 clinical trials of the four vaccine candidates will enable the selection of a lead candidate and dose level for an anticipated large, global Phase 2b/3 safety and efficacy study that may begin as early as later this month, pending regulatory approval.

If the ongoing studies are successful, Pfizer and BioNTech expect to be ready to seek Emergency Use Authorization or some form of regulatory approval as early as October 2020. The companies currently expect to manufacture globally up to 100 million doses by the end of 2020 and potentially more than 1.3 billion doses by the end of 2021, subject to final dose selection from their clinical trial.

In addition to engagements with governments, Pfizer and BioNTech have provided an expression of interest for possible supply to the COVAX Facility, a mechanism established by Gavi, the Vaccine Alliance, the Coalition for Epidemic Preparedness Innovations (CEPI) and World Health Organization (WHO) that aims to provide governments with early access to a large portfolio of COVID-19 candidate vaccines using a range of technology platforms, produced by multiple manufacturers across the world

About Pfizer: Breakthroughs That Change Patients' Lives

At Pfizer, we apply science and our global resources to bring therapies to people that extend and significantly improve their lives. We strive to set the standard for quality, safety and value in the discovery, development and manufacture of health care products, including innovative medicines and vaccines. Every day, Pfizer colleagues work across developed and emerging markets to advance wellness, prevention, treatments and cures that challenge most feared diseases of our time. Consistent with our responsibility as one of the world's premier innovative biopharmaceutical companies, we collaborate with health care providers, governments and local communities to support and expand access to reliable, affordable health care around the world. For more than 150 years, we have worked to make a difference for all who rely on us. We routinely post information that may be important to investors on our website at www.Pfizer.com

(<https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.pfizer.com%2F&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=www.Pfizer.com&index=1&md5=6f112a969d509e17034b14f144afa93f>).

In addition, to learn more, please visit us on www.Pfizer.com (<https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.pfizer.com%2F&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=www.Pfizer.com&index=2&md5=45840dd0e78d45b4d317726bbddf29ec>) and follow us

on Twitter at [@Pfizer](https://twitter.com/Pfizer) (<https://cts.businesswire.com/ct/CT?id=smartlink&url=https%3A%2F%2Ftwitter.com%2Fpfizer&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=%40Pfizer&index=3&md5=18c0aee73883336002d6bd4014593aa4>),

and [@Pfizer News](https://twitter.com/PfizerNews) (https://cts.businesswire.com/ct/CT?id=smartlink&url=https%3A%2F%2Ftwitter.com%2Fpfizer_news&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=%40Pfizer+News&index=4&md5=12c74b1b7a29bc30b293f916acd426b4),

[LinkedIn](https://www.linkedin.com/company/pfizer) (<https://cts.businesswire.com/ct/CT?id=smartlink&url=https%3A%2F%2Fwww.linkedin.com%2Fcompany%2Fpfizer&esheet=52254092&n>

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Pfizer Disclosure Notice

The information contained in this release is as of July 22, 2020. Pfizer assumes no obligation to update forward-looking statements contained in this release as the result of new information or future events or developments.

This release contains forward-looking information about Pfizer's efforts to combat COVID-19, the BNT162 mRNA vaccine program, a collaboration between BioNTech and Pfizer to develop a potential COVID-19 vaccine, an agreement with the United States to manufacture and deliver BNT162 and other potential agreements, including their potential benefits, manufacturing and distribution and the expected timing of clinical trials and regulatory submissions, that involves substantial risks and uncertainties that could cause actual results to differ materially from those expressed or implied by such statements. Risks and uncertainties include, among other things, the uncertainties inherent in research and development, including the ability to meet anticipated clinical endpoints, commencement and/or completion dates for clinical trials, regulatory submission dates, regulatory approval dates and/or launch dates, as well as the possibility of unfavorable new preclinical or clinical trial data and further analyses of existing preclinical or clinical trial data; risks associated with preliminary data; the risk that clinical trial data are subject to differing interpretations and assessments, including during the peer review/publication process, in the scientific community generally, and by regulatory authorities; whether and when data from the BNT162 mRNA vaccine program will be published in scientific journal publications and, if so, when and with what modifications; whether regulatory authorities will be satisfied with the design of and results from these and future preclinical and clinical studies; whether and when any biologics license applications may be filed in any jurisdictions for any potential vaccine candidates under the collaboration; whether and when any such applications may be approved by regulatory authorities, which will depend on myriad factors, including making a determination as to whether the product's benefits outweigh its known risks and determination of the product's efficacy and, if approved, whether any such vaccine candidates will be commercially successful; decisions by regulatory authorities impacting labeling, manufacturing processes, safety and/or other matters that could

affect the availability or commercial potential of any such vaccine candidates, including development of products or therapies by other companies; manufacturing capabilities or capacity, including whether the estimated numbers of doses can be manufactured within the projected time periods indicated; whether and when a future production agreement with the United States will be reached; whether and when other supply agreements will be reached; uncertainties regarding the ability to obtain recommendations from vaccine technical committees and other public health authorities regarding any such vaccine candidates and uncertainties regarding the commercial impact of any such recommendations; and competitive developments.

A further description of risks and uncertainties can be found in Pfizer's Annual Report on Form 10-K for the fiscal year ended December 31, 2019 and in its subsequent reports on Form 10-Q, including in the sections thereof captioned "Risk Factors" and "Forward-Looking Information and Factors That May Affect Future Results", as well as in its subsequent reports on Form 8-K, all of which are filed with the U.S. Securities and Exchange Commission and available at www.sec.gov

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www.pfizer.com ([https://cts.businesswire.com/ct/CT?](https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.pfizer.com&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=www.pfizer.com&index=9&md5=0e0666bbb77fefe8cbc330b3153345db)

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[US&anchor=www.pfizer.com&index=9&md5=0e0666bbb77fefe8cbc330b3153345db](https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.pfizer.com&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=www.pfizer.com&index=9&md5=0e0666bbb77fefe8cbc330b3153345db)).

About BioNTech

Biopharmaceutical New Technologies is a next generation immunotherapy company pioneering novel therapies for cancer and other serious diseases. The Company exploits a wide array of computational discovery and therapeutic drug platforms for the rapid development of novel biopharmaceuticals. Its broad portfolio of oncology product candidates includes individualized and off-the-shelf mRNA-based therapies, innovative chimeric antigen receptor T cells, bi-specific checkpoint immuno-modulators, targeted cancer antibodies and small molecules. Based on its deep expertise in mRNA vaccine development and in-house manufacturing capabilities, BioNTech and its collaborators are developing multiple mRNA vaccine candidates for a range of infectious diseases alongside its diverse oncology pipeline. BioNTech has established a broad set of relationships with multiple global pharmaceutical collaborators, including Genmab, Sanofi, Bayer Animal Health, Genentech, a member of the Roche Group, Genevant, Fosun Pharma, and Pfizer. For more information, please visit www.BioNTech.de ([https://cts.businesswire.com/ct/CT?](https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.BioNTech.de&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=www.BioNTech.de&index=10&md5=fb8be4528863006c664ea37b6856d4f7)

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[US&anchor=www.BioNTech.de&index=10&md5=fb8be4528863006c664ea37b6856d4f7](https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.BioNTech.de&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=www.BioNTech.de&index=10&md5=fb8be4528863006c664ea37b6856d4f7)).

BioNTech Forward looking statements

This press release contains “forward looking statements” of BioNTech within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements may include, but may not be limited to, statements concerning: BioNTech’s efforts to combat COVID-19; the timing to initiate clinical trials of BNT162 and anticipated publication of data from these clinical trials; the timing for any potential emergency use authorizations or approvals; the potential to enter into additional supply agreements with other jurisdictions or the COVAX Facility; the potential safety and efficacy of BNT162; the collaboration between BioNTech and Pfizer to develop a potential COVID-19 vaccine; and the ability of BioNTech to supply the quantities of BNT162 to support clinical development and, if approved, market demand, including our production estimates for 2020 and 2021. Any forward-looking statements in this press release are based on BioNTech current expectations and beliefs of future events, and are subject to a number of risks and uncertainties that could cause actual results to differ materially and adversely from those set forth in or implied by such forward looking statements. These risks and uncertainties include, but are not limited to competition to create a vaccine for COVID-19; the ability to produce comparable clinical results in larger and more diverse clinical trials; the ability to effectively scale our productions capabilities; and other potential difficulties. For a discussion of these and other risks and uncertainties, see BioNTech’s Annual Report on Form 20 F filed with the SEC March 31, 2020, which is available on the SEC’s website at www.sec.gov (<https://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.sec.gov&esheet=52254092&newsitemid=20200722005438&lan=en-US&anchor=www.sec.gov&index=11&md5=4cc240b3adda2fc54d0e18f1cca607ef>). All information in this press release is as of the date of the release, and BioNTech undertakes no duty to update this information unless required by law.

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