

Chiesi Ltd. : Methodological note for disclosure of Transfers of Value for Members of the UK Public, including Patients and Journalists for 2023

Introduction

The Association of British Pharmaceutical Industry (ABPI) Code of Practice requires that all companies must document and publicly disclose certain transfers of value made directly or indirectly to health professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations, patient organisations and Members of the Public located in Europe. Disclosure is required even if the payments etc. are made by overseas affiliates, head offices in the UK or overseas and UK based offices. Each company providing transfers of value must publish a note summarising the methodologies used by it in preparing the disclosures and identifying each category of transfer of value.

About Chiesi:

As with every part of the Chiesi Group, we embrace a shared set of values and a common code of ethical conduct. This demands the highest standards of reliability, transparency, and individual accountability, in everything we do, and emphasises the importance of collaborative working, putting people first and exchanging knowledge. Implicit in all of these is a responsible attitude to the social and environmental impact of our actions.

Definitions:

The term **'transfers of value'** means a direct or indirect transfer of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

- A direct transfer of value is one made directly by Chiesi for the benefit of a recipient.
- An indirect transfer of value is one made on behalf of Chiesi for the benefit of a recipient or through an intermediary and where Chiesi knows or can identify the recipient that will benefit from the transfer of value.

The term **'Members of the UK Public'**, which includes **Patients** and **Journalists**, means individuals who are not registered as HCPs or ORDMs.

Descriptors:

1. Time period

- o This Methodological Note relates to disclosures of transfers of value in 2023. This means that any payment made in 2023 has been included in the disclosure irrespective of the commencement date of the service to which it relates.
- o Disclosures must be made annually in respect of the previous calendar year. Disclosure will be in the first six months after the end of the calendar year in which the transfers of value were made. The information disclosed will remain in the public domain for at least three years from the time of disclosure.

2. UK Data Privacy

- o Total payments in respect of each group of individuals are disclosed in an aggregate form, i.e., the public, patients, and journalists, without the necessity to divulge personal data or confidential information.

3. Tax considerations

- o All payments reported do not have any provision for Personal or Corporation Tax paid by Members of the Public.

4. VAT

- o Payments made to Members of the UK Public are reported exclusive of VAT.

5. Currency aspects (including conversion rates)

- o For payments made in Euros, the amount is converted into GBP using the European Central Bank's closing exchange rate on the day of payment when paid through our contracting and payment system.
- o Where a payment was agreed in Euros and paid via our internal Finance system in GBP, the amount is converted into GBP (using the exchange rate) at the time of contracting.
- o Where a payment was agreed in Euros and paid via our internal Finance system in Euros, the amount is converted into GBP (using the exchange rate) at the time of the event.

6. Cross border payments

Payments made by overseas affiliates, head offices in the UK or overseas and UK-based offices are included in disclosure.

7. Payments to Members of the Public

Payments include transfers of value, directly or indirectly for fees to perform certain contracted services. These include, without limitation, speaking at meetings, assistance with training, writing articles and/or publications, participating in advisory boards, advising on the design etc. of clinical trials and participating in market research where such participation involves remuneration and/or travel.

8. Collaborative Working

Chiesi has not undertaken any Collaborative Working including Joint Working activity during 2023.