

Chiesi Ltd. : Methodological note for disclosure of Transfers of Value for Patient Organisations for 2021

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, other relevant decision makers (ORDM) and healthcare organisations and patient organisations 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 **'Patient Organisation'** means an organisation mainly comprising of patients and/ or caregivers or any user organisation such as a disability organisation, care or relative organisation and consumer organisation that represents and/ or supports the needs of patients and/ or caregivers.

The term **'collaborative working'** means a situation where, pharmaceutical companies work with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care.

The term '**sponsorship**' means a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company towards an activity (including an event/meeting or material) performed, organised, created, etc., by a healthcare organisation, patient organisation or other independent organisation.

The term '**Grant/Donation**' means a grant/donation of funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient organisation, institution and the like to provide goods or services to the benefit of the pharmaceutical company in return.

Descriptors:

1. Time period
 - o This Methodological Note represents disclosures for transfers of value in 2021. This means that any payment made in 2021 has been included in the disclosure irrespective of the commencement date of the service.
 - o Disclosures must be made annually in respect of each 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 UK Data Privacy regulations do not apply to organisations as data is not classified as personal.

3. Tax considerations
 - o All payments reported do not have any provision for Personal or Corporation Tax paid by patient organisations.

4. VAT
 - o Payments made to patient organisations are reported exclusive of VAT.

5. Currency aspects (including conversion rates)
 - o For fee for service payment paid in Euros, the amount is converted into GBP using the European Central Banks closing exchange rate on the day of payment when paid through our contracting and payment system.
 - o Where a fee for service payment was agreed in Euros and paid via our internal Finance system in GBP with an organisation or HP/ORDM, the amount is then converted into GBP (using the exchange rate) at the time of contracting.
 - o Where a fee for service payment was agreed in Euros and paid via our internal Finance system in EUROS with an organisation or HP/ORDM, the amount is then converted into GBP (using the exchange rate) at the time of the event.

6. Cross border payments
 - o Payments to patient organisations in Northern Ireland and Republic of Ireland are disclosed within the UK data.

7. Payments to patient organisations
 - o Payments to patient organisations are disclosed on a 'per activity' basis
 - o Payments to patient organisations in respect of stand space may be inclusive of food and beverages.

8. Collaborative Working
 - o Chiesi has not undertaken any Collaborative Working including Joint Working activity during 2021.