

Chiesi Limited: Methodological note for disclosure of Transfers of Value for Members of the UK Public, including Patients and Journalists for 2024

Introduction

The Association of British Pharmaceutical Industry (ABPI) Code of Practice requires that all member companies document and publicly disclose certain transfers of value made directly or indirectly to health professionals, healthcare organisations, other relevant decision makers (ORDM), patient organisations and members of the public, located in Europe. Disclosure is required for transfers of value related to overseas affiliates, and UK based offices. Each company providing transfers of value must publish a note summarising the methodologies used in preparing the disclosures and identifying each category.

About Chiesi:

The Chiesi Group embraces 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. Chiesi Limited (Chiesi) is a UK based affiliate of the Chiesi Group.

Definitions:

The term **‘transfers of value’** (ToV) means a direct or an indirect ToV, 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 ToV is one made directly by Chiesi for the benefit of a recipient.
- An indirect ToV is one made on behalf of Chiesi for the benefit of a recipient through an intermediary and where Chiesi knows or can identify the recipient that will benefit from the ToV.

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

The term '**registration fee**' refers to a fee paid to register, enrol, or sign up for a formal training course or meeting or direct funding such as sponsorship fees.

The term '**travel and accommodation**' means the costs of travel and accommodation, both inside and outside the UK (this excludes subsistence payments).

The term '**expenses**' means the cost of any expenditure, resulting in providing a service to Chiesi or attending an event where Chiesi has provided attendance support.

Descriptors:

1. Time period

- This Methodological Note represents disclosures for ToV in 2024. This means that any payment made in 2024 has been included in the disclosure irrespective of the commencement date of the service.
- Disclosures are made annually in respect of each calendar year.
- Disclosure is made in the first six months after the end of the calendar year in which the ToV 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

- Data is disclosed as an aggregate whereby no individual names are published. Disclosure requirements are set out in the 2024 ABPI Code of Practice, Clause 30.

3. Tax considerations

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

4. VAT

- The declared ToV for direct payments made to individuals for a fee for service, are exclusive of VAT.
- The declared ToV for expenses reimbursement made to individuals, may be inclusive or exclusive of VAT.

5. Currency aspects (including conversion rates)

- For payments not paid in GBP, through our contracting and payment system, for disclosure the amount is converted into GBP using the closing exchange rate on the day of payment.
- For payments not paid in GBP, through our internal Finance system, for disclosure 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. These transfers of values are published as an aggregate on the following Chiesi webpage: [Commitment to transparency](#).

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