Chiesi Limited Methodological Note for Members of the Public and Patient Organisations Disclosure 2025

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Contents

Introduction

The pharmaceutical industry's relationships with health professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs), patient organisations (POs) and members of the public (MoPs) are a key area of public interest. There are detailed requirements in the ABPI Code of Practice for the Pharmaceutical Industry (the Code) setting out the basis of these relationships which include disclosure obligations relating to any transfers of value made to these groups or individuals.

Details of such transfers of value are published on a publicly available central platform, Disclosure UK. The platform was launched in June 2016, when 2015 data was published, and currently lists data for the last three calendar years.

By creating greater transparency around the pharmaceutical industry's collaborations and partnerships with HCPs, ORDMs, HCOs, MoPs and POs, the ABPI Code requirements for disclosure of certain transfers of value aim to improve understanding and increase the public's confidence in these relationships.

The ABPI Code disclosure requirements are set out in Clauses 28 to 31 of the 2024 Code.

This methodological note provides a summary of the approach applied by Chiesi in preparing the disclosures and identifying each category of transfers of value. It sets out the types of transfers to be disclosed, those that are excluded and other relevant information explaining how Chiesi has defined and reported the disclosed data.

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.

1 Definitions

1.1 Recipients

Members of the UK Public (MoPs), which includes Patients, Patient Experts and Journalists: Are individuals not registered as HCPs or ORDMs.

Patient Organisations (POs): Organisations comprising of patients and/ or caregivers or any user organisation such as a disability organisation, care or relative organisation or consumer organisation that represents and/or supports the needs of patients and/ or caregivers.

1.2 Kind of ToVs

Transfers of Value are direct or indirect transfers of value, whether in cash, in kind or otherwise, made for promotional purposes or otherwise, in connection with the development or sale of medicines. For Chiesi, the ToVs disclosed are:

Expenses: the cost of expenditure incurred as a result of providing a service to Chiesi or attending an event where attendance support has been provided.

Grant/Donation: grants and donations are funds, benefits in kind or services provided by a pharmaceutical company on an unconditional basis to support healthcare, scientific research, or education. They must not be given in return for any service, obligation, or benefit to the company, and must not be used to influence or reward prescribing, purchasing, supply, administration, recommendation, or sale of medicines.

Registration fee: refers to a fee paid to register, enrol, or sign up for a formal training course or meeting.

Sponsorship: a contribution, financial or otherwise, provided by or on behalf of a company towards an activity (including an event, meeting, or materials) organised by a Patient Organisation.

Travel and accommodation: costs of travel and accommodation, both inside and outside the UK, excluding subsistence.

2 Disclosure's Scope

2.1 Company concerned

All transfer of values made by Chiesi UK and Ireland, Chiesi's parent company (Chiesi Farmaceutici S.p.A.) and global affiliates to UK based POs and MoPs.

2.2 Excluded ToVs

ToVs excluded from disclosure are:

Subsistence Provided at Chiesi Owned Meetings

As per the Code, food, drink, refreshments, and other subsistence provided at Chiesi owned/led meetings is excluded from disclosure. Subsistence at a company owned meeting is considered a necessary part of hosting the meeting, not a transfer of value to the attendee. It is therefore, not classified as a ToV under the ABPI code.

Subsistence at Third Party Events provided directly to MoPs.

Chiesi does not disclose subsistence provided directly to a MoP at a third-party event. Where Chiesi has funded or provided subsistence as part of a sponsorship agreement with the third-party organisation, this is included in Chiesi's disclosure against that third party organisation.

2.3 Direct ToVs

Direct ToVs are payments made directly by a company for the benefit of a recipient. Chiesi has made direct ToVs under the following categories:

Direct Payments to MoP

Direct payments made to a MoP, under a valid written agreement for legitimate, contracted services, which include consultancy fees and/honoraria for:

- Speaking engagements
- Participation in advisory boards
- Panel discussions/participation
- Chairing, moderating or facilitation roles
- Development of educational or patient materials
- General consultancy.

Direct Payments to POs

Direct payments made to a PO, under a valid written agreement, which include consultancy fees and/honoraria for:

- Speaking engagements
- Participation in advisory boards
- Panel discussions/participation
- Chairing, moderating or facilitation roles
- Development of educational or patient materials
- Contribution to the development of disease awareness campaigns
- General consultancy

- Meeting sponsorship
- Stand space and exhibition fees
- Grants and donations.

2.4 Indirect ToVs

An indirect ToV is a payment or benefit provided by a company through an intermediary, such as an event organiser, supplier, or agency, where the company can identify the individual or organisation that ultimately receives the benefit. Chiesi has made indirect ToVs under the following categories:

- Sponsorship of third-party events where payment is made to an intermediary on behalf of an organisation
- Grants and donations channelled through intermediary organisations
- Funding provided via third parties to support identifiable individuals to attend events (for example, where Chiesi books and pays for the travel and/or accommodation for an individual to attend a Chiesi-related activity such as an educational meeting, congress, or advisory board).

2.5 ToV date

Direct ToVs: any payment made in 2025 is included in the disclosure, irrespective of the commencement date of the service.

Indirect ToVs: these ToVs are disclosed in the year in which the benefit is received, and not necessarily when the payment or booking is made.

Frequency of publication and availability of information: disclosures are made annually and published within the first six months following the end of the calendar year. Information disclosed remains publicly available for a minimum of three years.

2.6 ToVs in case of partial attendances or cancellation and refund

Chiesi disclosure is based on actual payments made in the disclosure year. Any adjustments for cancellations and/or refunds are reviewed on an individual basis.

2.7 Cross-border activities

All cross-border activities relating to UK and Ireland for MoP and POs are captured through Chiesi's overseas engagement process. This ensures that appropriate approvals are obtained and that all relevant payments are captured and reported in accordance with Code principles.

3 Specific considerations

3.1 Self-incorporated MoP

Where a MoP has established a legal entity (typically a limited company), and fees for services or other Transfers of Value are paid to that entity, the ToV will still be disclosed on an aggregate basis.

3.2 Multi-year agreements

For multi-year agreements, transfers of value are disclosed in the year in which the payment is made.

3.3 Quality Checks

Quality checks are performed throughout the year to ensure that all data intended for disclosure is complete and accurate to the best of our knowledge.

- All contracts undergo internal checks before release and signature, with high value contracts receiving an additional review prior to payment to confirm the activity, payment level and approval route are legitimate, compliant, and correctly authorised.
- All direct and indirect payments require advance approval, with actual values verified post event and re approved where necessary before payment is made.
- An annual data cleanse is conducted to maintain data integrity, and any newly created vendors are reviewed at the point of entry to ensure they are correctly categorised.
- Data for disclosure is collated from finance systems, contracting and CRM platforms, source reports, and global affiliates/head office.
- The dataset is validated by a member of staff, with reports cross checked against CRM activity where applicable.
- The final submission is reconciled against source reports prior to disclosure to ensure accuracy, consistency, and appropriateness for publication.

4 Form of disclosure

4.1 Date of publication

30th June 2026.

4.2 Disclosure platform

Disclosure UK – ABPI disclosure platform www.disclosureuk.org.uk

4.3 Disclosure language

English (United Kingdom)

5 Disclosure financial data

5.1 Currency

GBP

For payments made in a currency other than GBP, where the payment is initiated through our contracting and payment system, the amount is converted into GBP using the average exchange rate for the year in which the payment was made.

For payments made in a currency other than GBP and processed through our internal Finance system, the amount is likewise converted into GBP for disclosure using the average exchange rate applicable for the year of payment.

5.2 VAT included or excluded

The declared transfer of value for direct payments made to MoP or POs for a fee for service are exclusive of VAT.

The declared transfer of value for expenses reimbursement made to the MoP may be inclusive or exclusive of VAT.

The declared transfer of value for indirect payments made to POs are reported inclusive or exclusive of VAT.

6 Additional Information

6.1 Name matching (from multiple sources)

Where only an initial is available instead of a full first name, and another entry appears similar, Chiesi will not assume that the records relate to the same individual unless there is sufficient certainty. In such circumstances, transfers of value may be treated as a separate entry (in aggregate form) where it cannot be confirmed that they relate to the same person.

6.2 Aggregate Values

As per the Code :

- For MoPs, disclosures are aggregated, with total annual value aggregated by activity type and number of individuals. Disclosure are not made against individuals.
- Patient Organisations are disclosed by organisation, including type of activity and spend.
- Disclosures are published on the Chiesi website (Ethics and Transparency page).

6.3 Personal or Corporation Tax

All payments reported do not have any provision for Personal or Corporation Tax paid by individuals or organisations.

END OF SECTION