

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) and patient organisations 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 **‘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 '**support**' for an individual, means the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual health professionals or other relevant decision makers to attend events/ meetings.
- The term '**sponsorship**' means a contribution, financial or otherwise, in whole or in part provided by 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

- 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 was made.
- The information disclosed will remain in the public domain for at least three years from the time of disclosure.

2. UK Data Privacy

- UK Data Privacy regulations do not apply to organisations as the data is not classified as personal.

3. Tax considerations

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

4. VAT

- The declared ToV for direct payments made to organisations are reported exclusive of VAT.
- The declared ToV for indirect payments made to organisations are reported 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 to individuals and organisations in Northern Ireland and Republic of Ireland are disclosed within the UK data platform.

7. Payments to organisations

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

8. Collaborative Working

- Chiesi has undertaken Collaborative Working projects during 2024. All ToV, direct and indirect, related to Collaborative Working has been included in the disclosure data. A full summary of each Collaborative working project can be accessed on this [link](#)

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