

Recordati Rare Diseases UK Limited

Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

This methodological note summarises the methodologies used by Recordati Rare Diseases UK Limited ('the Company') in preparing disclosures and identifying categories of transfer of value, in compliance with Clause 28.6 of the 2024 ABPI Code.

The definition of 'Transfer of Value' in Clause 1.25 of the 2024 ABPI Code has been used.

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1 Definitions

1.1 Recipients

In 2025, the Company made transfers of value to healthcare professionals and healthcare organisations as defined in Clause 1.9 and 1.8 of the 2024 ABPI Code.

No transfers of value were made in 2025 to Other Relevant Decision Makers, as defined in Clause 1.13 of the 2024 ABPI Code.

1 transfer of value was made in 2025 to a retired or deceased healthcare professional. This individual had their transfer of value disclosed as part of the aggregate amount disclosed for transfers of value to members of the public.

1.2 Kind of ToVs

In 2025, 44 healthcare professionals received at least one transfer of value from the Company, in the following categories:

6 healthcare professional received contributions towards the costs of attending events, in the form of registration fees.

11 healthcare professionals received contributions towards the costs of attending events, in the form of travel and accommodation support.

31 healthcare professionals received fees (honorarium) in relation to contracted services.

17 healthcare professionals received expenses in relation to contracted services.

In 2025, 15 healthcare organisations received transfers of value from the Company, in the following categories:

2 grants were provided to 2 healthcare organisations.

19 sponsorships were provided to 13 healthcare organisations.

0 donations were provided.

2 payments were provided to 2 healthcare organisations as fees in relation to contracted services.

0 expenses were provided to health organisations in relation to contracted services.

Grants, donations and sponsorship were defined as per Clauses 1.5 and 1.22 of 2024 ABPI Code.

2 Disclosure's Scope

2.1 Products concerned

All transfers of value reported were made by the Company in relation to its prescription only medicines.

2.2 Company concerned

Recordati UK Ltd, Recordati Rare Diseases UK Limited and Recordati Pharmaceuticals Limited are separate legal entities, which are part of the Recordati Group of companies. Transfers of value for each legal entity are disclosed separately.

2.3 Excluded ToVs

[None]

2.4 ToVs date

1st January 2025 – 31st December 2025.

2.5 Direct ToVs

Direct transfers of value made by the Company to healthcare professionals included fee for service contracts (fees and expenses) and contributions to the cost of events (registration fees, travel and accommodation costs).

Direct transfers of value made by the Company to healthcare organisations included fee for service contracts (fees), grants and sponsorship agreements.

2.6 Indirect ToVs

No indirect transfers of value, as defined in Clause 1.25 of the 2024 ABPI Code, were made by the Company in 2025.

2.7 Non-monetary ToVs

No non-monetary transfers of value were made by the Company in 2025.

2.8 ToVs in case of partial attendances or cancellation and refund

No cases of partial attendance or cancellation occurred in 2025.

2.9 Cross-border activities

Cross-border monetary transfers of value from global or non-UK affiliates of the Company to UK individuals and organisations have been compiled and disclosed by the Company on the ABPI Disclosure UK platform.

Cross-border payments from the Company to non-UK individuals and organisations will be disclosed by the Company's affiliate located in the country in which that individual or organisation is resident according to applicable local laws, regulations and pharmaceutical industry codes of practice.

2.10 R&D

The definition of research and development transfers of value in Clause 1.20 of the 2024 ABPI Code was used. Only research and development transfers of value to UK individuals and organisations were disclosed in the ABPI Disclosure UK platform. In determining the amounts to be disclosed, the Company considered both financial and non-financial transfers of value.

5 clinical trials meeting the Clause 1.20 definition were identified which were active in the UK in 2025. For all 5 clinical trials, the Company was the sponsor. Financial research and development transfers of value to UK organisations were identified for 2 of the clinical trials. The amounts were aggregated for the purposes of disclosure.

No research and development transfers of value to UK individuals were made in 2025.

2.11 Voluntary disclosure

The Company is not making any voluntary disclosures in 2025.

3 Specific considerations

3.1 Country unique identifier

Individual healthcare professionals included in the Company's 2025 disclosure were uniquely identified using IQVIA OneKey. Healthcare professionals without a OneKey were uniquely identified using other professional identifiers such as General Medical Council, General Pharmaceutical Council or Nursing and Midwifery Council registration number.

42 / 44 individuals were identified using OneKey in the 2025 disclosure. 2 individuals were identified using other professional identifiers.

Healthcare organisations were uniquely identified by Companies House company number.

3.2 Self-incorporated HCP

Where a transfer of value was made to an individual healthcare professional via a healthcare organisation e.g., their institution or a limited company, the Company has disclosed that transfer of value against the individual healthcare professional, not the organisation.

3.3 Multi-year agreements

In the case of agreements with individuals and organisations that span multiple years, the Company has disclosed only the transfers of value made within the relevant disclosure period i.e., between 1st January – 31st December 2025.

3.4 Country specificities

The Company has not entered into any collaborative working agreements with UK organisations in 2025.

3.5 Quality Checks

Information on transfers of value that were in-scope for disclosure were captured prospectively throughout the year. The information was reconciled against signed agreements, invoices received, the list of Good Received payments in the Company finance system and information from the Company travel and accommodation booking system, to produce the final disclosure database.

4 Data protection legal basis

4.1 Consent collection

Not applicable.

4.2 Legitimate interests

Personal data has been collected, held and processed in compliance with Applicable Laws and Codes, including, and in particular, the UK GDPR, the Data Protection Act 2018 and guidance as issued by the Information Commissioner from time to time (collectively, “Data Protection Legislation”). Further information can be obtained by contacting groupDPO@recordati.com.

The Company is using legitimate interests as the legal basis for individual named disclosure of transfer of values in 2025. The Company has included wording within their written agreements with individuals notifying them of our intent to use legitimate interests as the legal basis for disclosure. The written agreement also included wording indicating how an individual could make a request to opt out of named disclosure by contacting the Company data privacy officer. Individuals who opt out of named disclosure will have their transfers of value disclosed in aggregate.

5 Form of disclosure

5.1 Date of publication

30/06/2026

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

Disclosure has been made in GBP. Transfers of value made in Euros have been converted to GBP using the fixed exchange rate of 0.87 GBP : 1 EUR. Transfers of value made in USD have been converted to GBP using the fixed exchange rate of 0.74 GBP : 1 USD.

6.2 VAT included or excluded

Amounts disclosed are excluding VAT and other applicable taxes.

6.3 Calculation rules

Financial transfers of value have been disclosed as the actual amount paid, currency converted to GBP. No non-financial transfers of value were made in 2025.

7 Additional Information

None.