

Recordati UK Ltd - Methodological Note

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

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

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

Form of disclosure

- **Data year:** 13th November – 31st December 2024*
- **Date of publication:** 27th June 2025
- **Disclosure platform:**
 - Transfers of value to healthcare professionals, other relevant decision makers and healthcare organisations = ABPI Disclosure UK
<https://search.disclosureuk.org.uk/>
 - Transfers of value to patient organisations, patients, journalists and members of the public = Recordati UK Corporate Website
<https://www.recordatirarediseases.uk/>

***Note that the Company was added to the list of ABPI non-member companies who have agreed to comply with the ABPI Code and accept the jurisdiction of the PMCPA on the 13th of November 2024. Therefore, only transfers from this date onwards are disclosed for 2024.**

Financial data

All monetary transfers of value are disclosed in GBP and are exclusive of VAT and other applicable taxes. Where payments were made in any other currency, the amount has been converted to GBP using the average exchange rate on the day on which the transfer of value took place, rounded to the nearest 1 pence. Transactions

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have been currency converted for each category of disclosure prior to summation of the total disclosure amount, such that summation was performed in GBP.

Cross-border monetary transfers of value from global or non-UK affiliates of the Company to UK individuals and organisations have been complied and disclosed by the Company on the disclosure platforms above.

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.

For multi-year contracts, only the amount paid within the current calendar year will be disclosed.

For in-kind donations and non-monetary transfers of value, a monetary value has been ascribed to the transfer of value based on the cost of the materials or services provided.

Recipients

Recipients of transfers of value have been classified as follows:

- Healthcare professional, other relevant decision maker, healthcare organisation, patient organisation, individual representing a patient organisation – the definitions included in Clause 1 of the 2024 ABPI Code of Practice have been used.
- Patient – refers to an individual with a condition or a disease relevant to the areas in which the company is active.
- Journalist – is anyone who's primary occupation is writing for newspapers, magazines, or news websites or prepares news to be broadcast.
- Member of the public – is any person who does not fall into any of the other recipient categories.

The Company consider the recipient of a transfer of value to be the person or legal entity with which the Company entered into a contract.

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Where a healthcare professional or other relevant decision maker has requested to receive payment through their own limited company, this payment has been disclosed against the named individual rather than as a payment to the limited company.

Data protection

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 legal basis for individual named disclosure of transfers of value to healthcare professionals and other relevant decision makers for transfers of value made between 13th November – 31st December 2024 was written consent, obtained at the time of contract signing.

The percentages of individuals opting for named disclosure vs aggregate disclosure during this period for each category of transfer of value are shown below:

Applicable Clause of 2024 ABPI Code	Transfer of Value Category	Number of individuals with a relevant disclosure	Individual % (n)	Aggregate % (n)
10 – Meetings / Events	Registration Fees	0		
10 – Meetings / Events	Travel & Accommodation	0		
24 – Contracted Services	Fees	1	0% (0)	100% (1)
24 – Contracted Services	Expenses	0		
	All individuals who received at least one transfer of value	1	0% (0)	100% (1)

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No individuals opted for partial disclosure i.e., disclosure of one category of transfer of value but not others.

In total 1 healthcare professionals or other relevant decision makers received at least one disclosable transfer of value from the Company for the disclosable period 13th November – 31st December 2024. That individual opted for aggregate disclosure.

All transfers of value to organisations have been made on an individual named basis.

Transfers of value to patients, journalists and members of the public have been disclosed on an aggregated basis.

Specific considerations

Donations and grants are defined as in clause 1.5 of the 2024 ABPI Code.
Sponsorships are defined as in clause 1.22 of the 2024 ABPI Code.

Research and development transfers of value are defined as in clause 1.20 of the 2024 ABPI Code.

The date assigned to a transfer of value depends on the category:

- Fees and expenses in relation to contracted services (Clause 24) = the date on which the Company paid the invoice as recorded in our finance system.
- Sponsorships, Registration Fees, Travel and Accommodation costs in relation to meetings / events (Clause 10) = the date on which the associated meeting commenced.
- Grants (Clause 23) = the date on which the Company paid the invoice as recorded in our finance system.
- Donations (Clause 23) = the date on which the items or services were provided.
- Collaborative Working (Clause 20) = the total transfer of value made in relation to the project during the calendar year of disclosure (refer to the executive summary for more information). See also comment about multi-year contracts above.

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Summary of internal company pre-disclosure quality checks

Disclosure data was captured on a prospective basis throughout the year. This data was then reconciled against signed contracts, invoices received, the list of processed payments from the Company finance system and information from the Company travel and accommodation booking system, to produce the final disclosure database.

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