

Chiesi Limited: Methodological note for disclosure of Transfers of Value 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) 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 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 or through an intermediary and where Chiesi knows or can identify the recipient that will benefit from the ToV.

The term **‘health professional’** (HP) are defined as members of the medical, dental, pharmacy and nursing professions and any other persons who during their professional activities may administer, prescribe, purchase, recommend or supply a medicine. In relation to disclosure of ToV it also includes any employee of Chiesi whose primary occupation is that of a practising health professional.

The term **‘other relevant decision makers’** (ORDM) particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

The term **‘healthcare organisation’** (HCO) means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more HPs or ORDMs

provide services.

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 as a result of providing a service to Chiesi or attending an event where Chiesi has provided attendance support.

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 must be made annually in respect of each calendar year.
- Disclosure will be 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

- Individual HP/ORDM payments have been disclosed against those individuals using the lawful basis of legitimate interest.
- Under Data Privacy law, in the reporting period Chiesi relied upon the lawful basis of legitimate interest for the processing of personal data in respect of ToV to individuals. Under this lawful basis, individuals are entitled to object to the processing of their personal data for this purpose. In the event of an accepted objection, following consideration by Chiesi in accordance with the requirements of the UK GDPR, Chiesi has declared the relevant sum as an aggregate figure in a separate line entry within the required disclosure section.

3. Tax considerations

- All payments reported do not have any provision for Personal or Corporation Tax paid by HPs/ORDMs and healthcare organisations.

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.
- 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. Research & Development

- The figure Chiesi has provided refers to Research & Development which occurred in the UK and was paid directly by the UK. Full Chiesi Farmaceutici S.p.A. global spend on Research & Development is disclosed on the Chiesi Italy EFPIA disclosure platform.

7. Cross border payments

- Payments to individuals and organisations in Northern Ireland and Republic of Ireland are disclosed within the UK data platform.

8. 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.

9. Payments to individuals

- Payments where ToV is made directly or indirectly to individuals, include the total amount paid in a calendar year to individuals who have provided services.
- The names of the HPs/ORDMs are disclosed unless disclosure on a named basis has been objected to and Chiesi has accepted the objection. In such cases, Chiesi has declared the total spend as an aggregate figure as a separate line entry within the required disclosure section.
- Where a HP has indicated they are independent of any organisation, their principal place of practice has been disclosed as “N/A”
- Where ToV is not individually identifiable, such as a group cost, then the total amount will be apportioned equally between all those HPs/ORDMs who were the beneficiary of the support.
- Where support has been provided to an individual e.g., travel and accommodation for an event, this is disclosed in the year of the event. This may differ from the year in which the booking was made.

10. Name matching (from multiple sources)

- In circumstances where no first name has been provided, i.e. only an initial, another entry may appear to be the same individual. Chiesi may disclose this as two separate entries.
- In those circumstances where the first name, surname, place of work and address are the same, this has been assumed to be the same person and will be disclosed as a single entry.

11. 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](#)

12. Aggregate figures

- Where disclosure is required to be submitted as an aggregate value, such as research and development and payments to the members of the public (including journalists and patients), the ToV will be submitted as a total figure for each category type spend.
- For HPs/ORDMs/individuals, refer to number 2 - *UK Data Privacy* section.

End