



Chiesi Limited Methodological Note for Health Professionals, Other Relevant Decision Makers, and Healthcare Organisations Disclosure 2025

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Introduction

The pharmaceutical industry's relationships with health professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) is a key area of public interest. Members of the public want to be confident that such relationships are appropriate and that they can trust their health professional to provide high quality care based on clinical evidence and experience. There are detailed requirements in the ABPI Code of Practice for the Pharmaceutical Industry setting out the basis of these relationships which include disclosure obligations. Since 2012, certain transfers of value have been required to be collected and disclosed. Current ABPI Code requirements mean that data identifying HCPs, ORDMs and HCOs, who have received certain 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 and HCOs, 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 predominantly set out in Clauses 28 to 31 of the 2024 Code.

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

Healthcare Organisation (HCO): means any 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 HCPs or ORDMs provide services.

Health Professional (HCP): includes 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. For the purposes of disclosure, this also includes any employee of a pharmaceutical company, whose primary occupation is that of a practising health professional.

Other Relevant Decision Maker (ORDM): includes individuals, particularly those with an NHS role, who could influence the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine, but who are not health professionals.

Retired HCP/ORDM: Chiesi does not disclose Transfers of Value relating to retired HCPs or ORDMs where it has been informed of their retired status.

Deceased HCP/ORDM: where Chiesi is informed that an individual is deceased, the matter is handled with sensitivity and respect. Decisions on whether to disclose their data are made on a case-by-case basis, taking into account Chiesi's commitment to transparency and the specific circumstances involved.

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:

Collaborative working refers to situations where pharmaceutical companies work with other organisations to deliver initiatives that enhance patient care or benefit patients or the NHS or alternatively benefit the NHS and as a minimum maintain patient care. Collaborative working, including its implementation, must have and be able to demonstrate the pooling of skills, experience and/or resources from all the parties involved for the joint development and implementation of patient and/or healthcare centred projects. There must be a shared commitment to successful delivery from all parties, and each party must make a significant contribution.

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 an HCO or other independent organisation.

Support: the provision of a financial contribution, in whole or in part, paid directly or indirectly, to HCPs or ORDMs to attend events or meetings.

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

2 Disclosure's Scope

2.1 Products concerned

Disclosure relates solely to prescription-only medicines.

2.2 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 organisations HCPs, ORDMs and HCOs.

2.3 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 the HCP/ORDM

Chiesi does not disclose subsistence provided directly to an HCP or ORDM at a third-party event. Where the 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.

Free-of-Charge Product Stock

Product stock supplied free of charge by Chiesi (referred to as “*free of charge company goods*”) is excluded from Disclosure UK reporting, as it is treated as a term of trade rather than a Transfer of Value. This approach applies equally where product stock is provided through an Early Access Programme, including but not limited to the Early Access to Medicines Scheme. In such circumstances, the supply of medicine stock free of charge does not constitute a reportable Transfer of Value and is therefore excluded from disclosure.

2.4 ToVs 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.

2.5 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:

Fees for Services and Consultancy

Direct payments made to individuals or organisations (HCPs, ORDMs, HCOs, where applicable) under a valid written agreement for legitimate, contracted services. These include consultancy fees and/honoraria for:

- Speaking engagements.
- Participation in advisory boards.
- Chairing, moderating or facilitation roles.
- General consultancy.

Direct Payments to HCOs

Payments made directly to an HCO, disclosed on a per-activity basis. Examples include:

- Meeting sponsorship
- Stand space and exhibition fees.

Grants and Donations Paid Directly to HCOs

Where Chiesi provides direct financial support to an organisation through its grant and donation process.

2.6 Indirect ToVs

An indirect Transfer of Value 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).

2.7 Non-monetary ToVs

Staff time contributed by Chiesi employees to collaborative working is treated as a non-monetary transfer of value. This is calculated on the relevant NHS employee band level and time spent on the activity in question.

2.8 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.

2.9 Cross-border activities

All cross-border activities relating to UK and Ireland for HCPs, ORDMs and HCOs 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 ABPI Code principles.

2.10 R&D

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.

2.11 Voluntary disclosure

Chiesi Ltd does not make voluntary disclosures beyond those required under the ABPI Code.

3 Specific considerations

3.1 Country unique identifier

Chiesi uses assigned unique identifiers for HCPs and HCOs, which are derived from widely recognised healthcare reference datasets to support alignment and accuracy in disclosure reporting.

These identifiers are applied within Chiesi's financial and payment systems to support accurate aggregation, validation, and submission of ToV data. The use of such identifiers assists in ensuring that ToVs are attributed to the correct recipient and supports consistency across reporting cycles. These identifiers are not published as part of the public disclosure and the names of any commercial data providers are not disclosed.

3.2 Self-incorporated HCP

Where an HCP has established a legal entity (usually a limited company), and fees for services are paid, or other ToVs are made, to that entity, Chiesi will disclose the ToV against the individual HCP where they are the sole owner of the company.

3.3 Multi-year agreements

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

3.4 Country specificities

Chiesi undertook Collaborative Working projects during 2025. All transfers of value, both direct and indirect, relating to Collaborative Working have been included in the disclosure data. A full summary of each Collaborative Working project is available at the following [link](#). During 2025 there were no Collaborative Working projects which involved working with another pharmaceutical company.

3.5 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 Data protection legal basis

4.1 Consent collection

Not applicable.

4.2 Legitimate interests

Chiesi relies on the lawful basis of legitimate interests to publish individual HCP and ORDM ToV data.

Individuals are notified during the contracting process, or through other written engagement materials, that their data will be disclosed and that Chiesi relies on legitimate interests for this processing. They are also informed that they may object at any time and are provided with clear details of how to raise an objection.

Objections may be submitted either through the Disclosure Portal or directly to Chiesi. All objections are reviewed promptly by the Data Protection Officer (DPO) and a written response is issued to the individual as soon as reasonably practicable.

The outcome is documented in writing and communicated to the objector. Each case is assessed individually and approved where the circumstances justify non-disclosure, with the relevant ToV being reported in aggregate in accordance with the ABPI Code.

5 Form of disclosure

5.1 Date of publication

30th June 2026

5.2 Disclosure platform

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

5.3 Disclosure language

English (United Kingdom)

6 Disclosure financial data

6.1 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.

6.2 VAT included or excluded

The declared transfer of value for direct payments made to HCPs, ORDMs or HCOs for a fee for service are exclusive of VAT.

The declared transfer of value for expenses reimbursement made to HCPs and ORDMs may be inclusive or exclusive of VAT.

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

6.3 Calculation rules

Calculations are dependent on the nature of the activity giving rise to the ToV. Non-monetary, in kind ToVs arising from collaborative working, where Chiesi contributes employee time and resources, are calculated by reference to the estimated time spent on the activity and an equivalent NHS staff banding rate. This approach is used to ensure a consistent and proportionate valuation of such contributions.

7 Additional Information

7.1 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 disclosed as separate entries where it cannot be confirmed that they relate to the same person. Where the first name, surname, place of work and address are identical across records, these are treated as relating to the same individual and are disclosed as a single entry.

7.2 Aggregate Values

Where disclosure is required to be submitted as an aggregate value, such as research and development, the ToV will be submitted as a total figure for each category of type spend.

7.3 Personal or Corporation Tax

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