

Recordati UK Ltd Disclosure 2025

Data year: 2025

Year of publication: 2026

This document provides information on transfers of value made by Recordati UK Ltd ('the Company') to Healthcare Professionals, Healthcare Organisations and Patient Organisations resident in Ireland in accordance with Annex II and Annex V of the Irish Pharmaceutical Healthcare Association (IPHA) Code of Practice for the Pharmaceutical Industry V8.6, 1st June 2025.

This document also includes a methodological note summarising the methodologies used by the Company in preparing disclosures and identifying categories of transfer of value.

The Company is not a member of IPHA and therefore disclosures are being made on a voluntary basis and mandatory templates have not been used.

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1 Transfers of value

1.1 Healthcare Professionals

No transfers for value were made to healthcare professionals.

1.2 Healthcare Organisations

Healthcare Organisation Name	City	Address	Donations	Sponsorships	Grants	Fees	Expenses
Irish Society for Rheumatology	Dublin	Mespil House, Sussex Road	-	€5,000.00	-	-	-
Haematology Association of Ireland	Dublin	9A Coolkill, Sandyford	-	€4,500.00	-	-	-

1.3 Patient Organisations

No transfers for value were made to patient organisations.

2 Definitions

2.1 Recipients

In 2025, the Company made transfers of value to healthcare organisations as defined in Clause 1.9 of the 2025 IPHA Code.

No transfers of value were made in 2025 to healthcare professionals or patient organisations as defined in Clause 1.8 and 1.19 of the 2025 IPHA Code. |

2.2 Kind of ToVs

In 2025, 2 healthcare organisations received transfers of value from the Company in the following categories:

2 healthcare organisations received financial support in the form of sponsorships for meetings.

Grants, donations and sponsorship were defined as per Clauses 1.4 and 1.24 of the 2025 IPHA Code. |

3 Disclosure's Scope

3.1 Products concerned

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

3.2 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. |

3.3 Excluded ToVs

None. |

3.4 ToVs date

1st January 2025 – 31st December 2025. |

3.5 Direct ToVs

Direct transfers of value made by the Company to healthcare organisations included sponsorship agreements. |

3.6 Indirect ToVs

No indirect transfers of value, as defined in Annex V of the 2025 IPHA Code, were made by the company in 2025. |

3.7 Non-monetary ToVs

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

3.8 ToVs in case of partial attendances or cancellation and refund

No cases of partial attendance or cancellation occurred in 2025. |

3.9 Cross-border activities

Cross-border monetary transfers of value from global or non-Ireland affiliates of the Company to Ireland individuals and organisations have been compiled and disclosed by the Company on the company website <https://recordatirarediseases.co.uk/transparency/> .

Cross-border payments from the Company to non-Ireland 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. |

3.10 R&D

The definition of research and development transfers of value in Annex V of the 2025 IPHA Code was used. No research and development transfers of value were made to Irish individuals or organisations in 2025. |

3.11 Voluntary disclosure

The Company is not making any voluntary disclosures in 2025. |

4 Specific considerations

4.1 Country unique identifier

Individual healthcare professionals included in the Company's 2025 disclosure were uniquely identified using IQVIA OneKey ID. |

4.2 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. |

4.3 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. |

4.4 Country specificities

None. |

4.5 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 Receipted payments in the Company finance system and information from the Company travel and accommodation booking system, to produce the final disclosure database. |

5 Data protection legal basis

5.1 Consent collection

The Company has not sought consent for individual named disclosure of transfers of value. |

5.2 Legitimate interests

Personal data has been collected, held and processed in compliance with Applicable Laws and Codes, including, and in particular, the EU GDPR, 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's contracts with Irish healthcare professionals do not currently meet IPHA minimum mandatory requirements that must be contained in the transparency statement /

privacy policy of member pharmaceutical companies for processing of transfer of value data based on legitimate interests. |

6 Form of disclosure

6.1 Date of publication

30/06/2026 |

6.2 Disclosure platform

Company website – <https://recordatirarediseases.co.uk/transparency/> .

6.3 Disclosure language

English |

7 Disclosure financial data

7.1 Currency

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

7.2 VAT included or excluded

Amounts disclosed are excluding VAT and other applicable taxes. |

7.3 Calculation rules

Financial transfers of value have been disclosed as the actual amount paid, currency converted to EUR. Non-financial transfers of value were converted to an equivalent financial transfer of value based on known costs e.g., cost of goods, or fair market value e.g., for services. |

8 Additional Information

None. |