

Recordati UK Limited

Methodological note for Public and Patient Organisation disclosure 2025

Data year: 2025

Year of publication: 2026

This methodological note summarises the methodologies used by Recordati UK Limited ('the Company') in preparing disclosures and identifying categories of transfer of value, in compliance with Clause 30.1 of the 2024 ABPI Code.

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

Contents

1	Definitions	2
1.1	Recipients.....	2
1.2	Kind of ToVs	2
2	Disclosure's Scope.....	3
2.1	Products concerned	3
2.2	Company concerned	3
2.3	Excluded ToVs.....	3
2.4	ToVs date	3
2.5	Direct ToVs	3
2.6	Indirect ToVs.....	3
2.7	Non-monetary ToVs.....	3
2.8	ToVs in case of partial attendances or cancellation and refund	3
2.9	Cross-border activities.....	3
2.10	R&D.....	4
2.11	Voluntary disclosure	4
3	Specific considerations	4
3.1	Country unique identifier	4
3.2	Transfers of value to representatives of patient organisations	4

3.3	Multi-year agreements.....	4
3.4	Country specificities	4
3.5	Quality Checks	4
4	Data protection legal basis.....	5
4.1	Consent collection	5
4.2	Legitimate interests	5
5	Form of disclosure.....	5
5.1	Date of publication.....	5
5.2	Disclosure platform.....	5
5.3	Disclosure language.....	5
6	Disclosure financial data	5
6.1	Currency.....	5
6.2	VAT included or excluded	5
6.3	Calculation rules.....	5
7	Additional Information	5

1 Definitions

1.1 Recipients

In 2025, the Company did not make any transfers of value to members of the public, including patients – individuals not meeting the definition of healthcare professional or other relevant decision maker in Clauses 1.9 and 1.13 of the 2024 ABPI code.

In 2025, the Company made transfers of value to patient organisations and individuals representing patient organisations as defined in Clause 1.15 and 1.16 of the 2024 ABPI Code. |

1.2 Kind of ToVs

In 2025, 8 transfers of value were made by the Company to 1 patient organisation, in the following categories:

4 fees in relation to contracted services;

2 grants;

1 donation;

1 sponsorship of a meeting.

A more detailed description of the services and support provided for each transfer of value is provided in the completed disclosure template which can be downloaded from the company website www.recordatirarediseases.co.uk/transparency .

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 patient organisations included fee for service contracts (fees), grants, donations and sponsorship of meetings. |

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

1 non-monetary transfer of value to 1 patient organisation was made by the Company in 2025. The company arranged for a representative of the patient organisation to travel to a third-party organised conference in Europe. The company booked the flights and accommodation on behalf of the patient organisation and covered the cost of the conference registration. The financial equivalent value of the arrangements has been disclosed. |

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 UK company website www.recordatirarediseases.co.uk .

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

Please refer to the methodological note Methodological note for HCP/ORDM/HCO disclosure 2025 for details on transfers of value made in respect of research and development. |

2.11 Voluntary disclosure

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

3 Specific considerations

3.1 Country unique identifier

Patient organisations were uniquely identified by Companies House company number. |

3.2 Transfers of value to representatives of patient organisations

Where the Company contracted with individuals representing patient organisations to provide services, such contracts were made with the patient organisation, and the transfer of value has been disclosed as a payment to the patient organisation in accordance with Clause 27.5 of the 2024 ABPI Code. |

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 Receipted 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

As transfers of value made to members of the public, including patients and journalists, are disclosed in aggregate, there are no data privacy concerns with respect to disclosure.

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. |

5 Form of disclosure

5.1 Date of publication

30/06/2026 |

5.2 Disclosure platform

www.recordatirarediseases.co.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. |

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. |