

EFPIA Disclosure Code 2016 Self-Certification Scheme

Healthcare professionals (HCPs) and healthcare organisations (HCOs) with whom Recordati Industria Chimica e Farmaceutica S.p.A. works provide the Pharmaceutical Industry with valuable, independent and expert knowledge derived from their clinical and management experience. As owners of scientific knowledge and experts in medicinal products, pharmaceutical companies can be a unique resource to the healthcare systems and providers, which will ultimately benefit the patients.

Throughout the medicines life cycle pharma companies work with scientists and healthcare professionals. These collaborations are essential in addressing patient needs. Industry and healthcare professionals collaborate in a range of activities from clinical research to sharing best clinical practice and exchanging information on how new medicines fit into the patient pathway.

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions of their member companies with healthcare professionals and organisations meet the high standards of integrity and transparency. Building greater transparency to the relationships between pharma companies and HCPs/HCOs aims to building understanding of the collaboration and recognition of its value to patient care.

Recordati Industria Chimica e Farmaceutica S.p.A. hereby confirms that its disclosures of transfers of value (ToVs) to HCPs and HCOs made in 2015 have been reported in application of the EFPIA Disclosure Code following key principles:

Disclosure quality

Recordati Industria Chimica e Farmaceutica S.p.A. certifies that:

- Its disclosures are made in each country where it operates with affiliates that are members of local EFPIA member associations;
- Its disclosures include direct and indirect ToVs, as defined in the codes and associated guidance issued by EFPIA;
- Its Methodological Note describes the process it has followed in order to compile the data hereby disclosed.

Methodology used for the collection and organisation of ToVs is in line with the EFPIA Disclosure Code's requirements and applicable codes

Recordati Industria Chimica e Farmaceutica S.p.A. certifies that:

- Data collection complies with the requirements of the EFPIA Disclosure Code;
- Actions were taken to seek consent from HCPs and HCOs (each as defined in the EFPIA Disclosure Code), where applicable.

Aggregate disclosures are limited to Research and Development ToVs and such ToVs that cannot be disclosed on an individual basis for legal reasons

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Recordati Industria Chimica e Farmaceutica S.p.A. certifies that aggregate disclosure is limited to the following topics:

- Research and Development Transfers of Value (as defined in the EFPIA Disclosure Code);
- Transfers of Value to Recipients that have opposed to the publication on grounds of the protection of their private data;
- If an HCP or HCO (where applicable) has provided consent to individual disclosure only in respect of part of the Transfers of Value he/she/it received, all Transfers of Value to such HCP or HCO (where applicable) are being disclosed in the aggregate.

Seeking the consent of Recipients

Recordati Industria Chimica e Farmaceutica S.p.A. certifies that it has used all reasonable steps for the purpose of obtaining consent to individual disclosure where such consent is required by applicable law.

Date: 14/09/2016

Andrea Recordati
Chief Executive Officer
Recordati Industria Chimica e Farmaceutica S.p.A.

NB: This Self-certification Scheme (Letter) will be signed by EFPIA Board members (or equivalent position if the corporate member has no representative in the EFPIA Board) and will be published on the companies' websites at the same time as the data disclosure. The Letters will also be published on the EFPIA website.