Methodology Statement for the Transfer of Value Disclosure

Clonmel Healthcare – Transfer of Value Publication

At Clonmel Healthcare, we are committed to conducting our business in a transparent, ethical, and compliant manner in alignment with the “Medicines for Ireland Code of Conduct". As part of this commitment, we disclose Transfers of Value (ToVs) to healthcare professionals (HCPs), healthcare organisations (HCOs), and related entities in accordance with applicable legal and regulatory requirements. This methodology statement outlines the principles, processes, and scope of our ToV disclosure to ensure accuracy and compliance with the Medicines for Ireland Code of Conduct.

1. Scope of Disclosure

The Transfers of Value disclosure includes payments and other forms of support provided directly or indirectly to Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs).

Where a ToV benefits both an HCP and an HCO, the recipient is determined and disclosed in accordance with the Medicines for Ireland Code of Conduct and local regulations.

2. Reporting Period and Currency

The Transfers of Value disclosure covers a full calendar year (January 1 – December 31). All reported ToVs are disclosed in euro (€). Where ToVs are incurred in other currencies, these are converted to euro based on the exchange rate at the time the payment was made or using the average exchange rate for the reporting period.

3. Data Collection and Sources

Clonmel Healthcare employs robust processes for collecting and verifying data related to Transfers of Value. This includes:

- Utilising internal financial systems to identify, document, and categorise relevant payments and ToVs.

- Engaging with HCPs and HCOs to ensure the accuracy of personal data and confirming their consent where required.

- Cross-referencing contractual agreements, invoices, and records of payment to ensure completeness.

Where indirect ToVs are made through third parties (e.g., agencies or conference organisers), Clonmel Healthcare ensures that appropriate records are maintained and included in the final disclosure.

4. Consent Management

For individual HCP disclosures, the Medicines for Ireland Code of Conduct encourages transparency and individual consent. Clonmel Healthcare actively seeks consent from HCPs to disclose personal ToVs.

- Individual Disclosure: Where consent has been provided, ToVs are disclosed under the name of the recipient HCP in accordance with data protection laws, including General Data Protection Regulation (GDPR).

- Aggregate Disclosure: When individual consent is not obtained, the ToV is included in aggregate under the relevant category.

HCO-related ToVs are disclosed without requiring additional consent, as they are related to entities rather than individuals.

5. Tax Considerations

The disclosed amounts represent the gross amounts paid and do not account for any potential tax liabilities or deductions applicable to the recipients.

6. Disclosure Format

Clonmel Healthcare complies with the Medicines for Ireland template for the structured presentation of ToV disclosures. Data files are published on our corporate website in a downloadable and visible format for public access.

Disclosed information is retained publicly for at least three years in compliance with the Medicines for Ireland Code of Conduct. Supporting documentation is retained internally for at least five years to ensure compliance with regulatory audits and requirements.

7. Excluded Items

In line with Medicines for Ireland guidelines, certain items are excluded from disclosure, such as:

- Hospitality of modest value that is aligned with normal business practices.

- Items of medical utility directly benefiting patients and enhancing the practice of medicine (if within permissible limits).

- Scholarships and educational programs provided as part of broader educational support mechanisms.

8. Exceptions and Special Cases

If a Transfer of Value is partially completed or spans multiple reporting periods, Clonmel Healthcare will disclose the relevant portion attributed to the reporting year. Clarifications for such cases, if applicable, will be detailed in the accompanying notes to the disclosure.

9. Compliance and Oversight

Clonmel Healthcare’s Transfer of Value disclosure is reviewed and approved by the Compliance and Legal functions to ensure adherence to the Medicines for Ireland Code of Conduct. We are committed to maintaining the highest standards of accuracy and ethical compliance in our reporting.

For inquiries or clarifications regarding our Transfers of Value practices or the methodology, please contact: Compliance Officer, Kieran Mulhall, kmulhall@clonmel-health.ie

This methodology statement ensures that our disclosure aligns with both the letter and spirit of the Medicines for Ireland Code of Conduct, promoting transparency and trust with HCPs, HCOs, and the general public.