

## FRESENIUS KABI LIMITED, FRESENIUS KABI IRELAND

### METHODOLOGICAL NOTES FOR REPORTING 2024

In Ireland the Irish Pharmaceutical Healthcare Association (**IPHA**) is the national association of the European Federation of Pharmaceutical Industries and Associations (**EFPIA**).

Fresenius Kabi Limited (**Fresenius Kabi Ireland**) is committed to ensuring transparency of Transfers of Value provided to HCPs and HCOs as required by the Irish Pharmaceutical Healthcare Association (**IPHA**) and the IPHA Code on Disclosure of Transfers of Value. Fresenius Kabi Ireland ensures that the nature and scope of any Transfers of Value with healthcare professionals, other relevant decision makers and healthcare organisations are clear and transparent and are disclosed in line with the IPHA Disclosure Template.

This Methodological Note provides guidance on how Fresenius Kabi Ireland have collected and reported this information. We have published Transfers of Value paid directly or indirectly for the period from 1 January 2024 to 31 December 2024.

When we talk about **Transfers of Value (ToV)** we mean a direct or indirect transfer of value, whether in cash, in kind or otherwise made, whether for promotional purposes or otherwise made by an entity in the Fresenius Kabi group of companies.

Please note that not all of Fresenius Kabi Ireland products and related ToV are in relation to medicinal products for human use; we have included ToV that relate to enteral nutritional products. This exceeds IPHA requirements but avoids attempting to isolate certain interactions related solely to medicinal products.

The term **healthcare professional** includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

The term **healthcare organisation** means either a 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 Ireland, or an organisation through which one or more health professionals or other relevant decision makers provide services.

The term **Other Relevant Decision Maker (ORDM)** includes those with a role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

#### ToV disclosed against individual healthcare professionals or ORDMs

Fees for service and consultancy and associated related expenses agreed in the fee for service or	We pay fair market value for the provision of services. This may include services such as chairing or speaking at meetings and participating in advisory boards. Agreements
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consultancy contract	are put in place and fees and any expenses are documented. Where ToV has been made to the hospital or trust rather than the individual this has been recorded as a payment to an HCO.
Contribution to costs relating to events	<p>We may provide contribution to costs for HCPs or ORDMS to attend third party organised meetings. This may also include related registration fees, accommodation and related travel expenses.</p> <p>We may reimburse travel and accommodation where HCPs/ORDMS attend Fresenius Kabi organised events.</p>

ToV disclosed against HCOs	
Contributions to cost of events	Fresenius Kabi Ireland disclose all payments to HCOs or third parties including sponsorship agreements. This includes direct funding and may also include contribution to costs of events including rental of booths at an event, advertisement space, satellite symposiums or congresses or sponsorship of speaker or faculty. This may also include travel and accommodation.
Fees for services and consultancy	Fees paid to HCOs for the provision of services and consultancy are reported as a fee against the relevant HCO.
Donations and grants	Any donations that support healthcare may include cash or benefits in kind.

### **Other considerations**

#### **What is excluded from Disclosure:**

- Purchases and sales of medicines in the ordinary course of business
- Market research projects or individuals or organisations contracted by third parties unless Fresenius Kabi Ireland knows the identity of the individual/organisation.
- Direct costs for food and drinks to individuals, unless catering costs have been invoiced and charged for certain activities.

- Third party management companies that are not owned or run by HCPs as they are not an HCO.

**Data Privacy:** The agreements between Fresenius Kabi Ireland and HCPs/ORDMs have a section referring to Disclosure and transparency which sets out Fresenius Kabi Ireland's disclosure obligations. Fresenius Kabi Ireland rely on legitimate interests as the legal basis to process and share data information for disclosure purposes in line with the Data Protection Statement which can be found [here](#).

Where HCPs communicate object to disclose payment information, any such payments are reported on an aggregated basis.

**Disclosure of HCPs and institutions:** Where an HCP is not affiliated with an institution or healthcare organisation, any disclosure for that HCP has been disclosed without an institution name or disclosed on an aggregate basis.

**Cross border activity:** Reportable transfers of value provided by Fresenius Kabi affiliates to Irish HCPs and HCOs have been included as part of the Disclosure exercise. Fresenius Kabi Ireland uses best endeavours to either obtain the consents necessary to disclose transfers of value at the individual level or relies on legitimate interests as the legal basis for disclosure purposes.

**Reporting:** We will look at whether the event or ToV took place within the reporting period 1 January 2024 to 31 December 2024.

**VAT:** Where applicable, disclosure of payments do not include VAT. Cross border transfers of value may include VAT depending on the source.

**Exchange Rate:** ToV are reported in Euro. Where transfers of value are in foreign currency, amounts are converted to Euro using a single annual exchange rate for each currency which can be provided on a case-by-case basis.

**Multi-year Contracts:** Where activities straddle calendar years, the amounts paid in the relevant year will be disclosed.

Where any issues are raised with reporting, we will review and any changes resulting from this review will be published in an updated report.

In case of any questions relating to this methodology please contact  
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