

CLINUVEL: Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

The CLINUVEL Group is guided by a principal set of values, which reflect how we operate and expand our business. As a member of the Association of the British Pharmaceutical Industry (ABPI), CLINUVEL (UK) LTD has committed to complying with the ABPI's Code of Practice for the Pharmaceutical Industry, including disclosing all transfers of value to UK based healthcare professionals (HCPs) and healthcare organisations (HCOs). All disclosures are facilitated through the ABPI platform Disclosures UK.

This document outlines CLINUVEL's methodology for disclosing transfers made during the period 01 January 2025 to 31 December 2025, inclusive. For clarity, the date of the transfer from CLINUVEL to a recipient is used to determine the period in which it is disclosed.

Table of Contents

CLINUVEL: METHODOLOGICAL NOTE FOR HCP/ORDM/HCO DISCLOSURE 2025	1
1	DEFINITIONS..... 2
1.1	<i>Recipients</i> 2
1.2	<i>Kind of ToVs</i> 2
2	DISCLOSURE'S SCOPE..... 2
2.1	<i>Products concerns</i> 2
2.2	<i>Company concerned</i> 2
2.3	<i>Excluded ToVs</i> 2
2.4	<i>ToVs date</i> 2
2.5	<i>Direct ToVs</i> 2
2.6	<i>Indirect ToVs</i> 2
2.7	<i>Non-monetary ToVs</i> 2
2.8	<i>ToVs in case of partial attendance or cancellation and refund</i> 2
2.9	<i>Cross-border activities</i> 2
2.10	<i>R&D</i> 2
2.11	<i>Voluntary disclosure</i> 3
3	SPECIFIC CONSIDERATIONS 3
3.1	<i>Country unique identifier</i> 3
3.2	<i>Self-incorporated HCP</i> 3
3.3	<i>Multi-year agreements</i> 3
3.4	<i>Country specificities</i> 3
3.5	<i>Quality checks</i> 3
4	DATA PROTECTION LEGAL BASIS 3
4.1	<i>Consent collection</i> 3
4.2	<i>Legitimate interests</i> 3
5	FORM OF DISCLOSURE 3
5.1	<i>Date of publication</i> 3
5.2	<i>Disclosure platform</i> 3
5.3	<i>Disclosure language</i> 3

6	DISCLOSURE FINANCIAL DATA	4
6.1	<i>Currency</i>	4
6.2	<i>VAT included or excluded</i>	4
6.3	<i>Calculation rules</i>	4
7	ADDITIONAL INFORMATION	4

1 Definitions

1.1 Recipients

CLINUVEL is disclosing transfers of value (ToVs) to UK-based healthcare professionals (HCPs) and healthcare organisations (HCOs).

1.2 Kind of ToVs

The transfers of value (ToVs) included are sponsorship, expert centre fees, and clinical trial fees.

2 Disclosure's Scope

2.1 Products concerns

CLINUVEL does not operate business segments relevant to over-the-counter services or medical devices and no related transfers require disclosure.

2.2 Company concerned

N/A

2.3 Excluded ToVs

N/A

2.4 ToVs date

Transfers disclosed were made from 1 January 2025 to 31 December 2025 inclusive.

2.5 Direct ToVs

N/A

2.6 Indirect ToVs

N/A

2.7 Non-monetary ToVs

N/A

2.8 ToVs in case of partial attendance or cancellation and refund

N/A

2.9 Cross-border activities

N/A

2.10 R&D

Expenditure for Research and Development include transfers of value to HCPs or HCOs in relation to the planning or conduct of:

Pre-clinical studies;

Clinical trials;

Non-interventional studies where data are collected prospectively from patients and/or physicians; and/or
Further research into the fields relevant to CLINUVEL's development of its products.

This may also include travel and accommodation to events where the main purpose of the event is to facilitate discussion or work related to one or more of the above situations (such as investigator meetings). Grants — where unrestricted funds are given to an HCP or HCO explicitly for the purposes of R&D work — are also included in the aggregate. Sponsorship or donations explicitly for the purpose of HCPs to attend scientific congresses are not generally considered R&D expenditure.

2.11 Voluntary disclosure

N/A

3 Specific considerations

3.1 Country unique identifier

N/A

3.2 Self-incorporated HCP

N/A

3.3 Multi-year agreements

Only payments made during the reporting period for multi-year contracts are disclosed, regardless of the length of the contract.

3.4 Country specificities

N/A

3.5 Quality checks

N/A

4 Data protection legal basis

4.1 Consent collection

Where a transfer is considered to meet the requirements of individual disclosure, CLINUVEL seeks explicit written consent from the HCP and/or HCO involved. Where consent cannot be obtained, transfers are disclosed in the relevant aggregate fields. In 2025, no transfers requiring consent were made.

4.2 Legitimate interests

5 Form of disclosure

5.1 Date of publication

30 June 2026.

5.2 Disclosure platform

www.disclosureuk.org.uk

5.3 Disclosure language

All disclosures are made in English.

6 Disclosure financial data

6.1 Currency

All transfers are disclosed in British Pounds (GBP), with exchange rates on the day of the payment used to convert any non-GBP payments.

6.2 VAT included or excluded

All payments disclosed are inclusive of all appropriate taxes where applicable, including but not limited to Value Added Tax (VAT).

6.3 Calculation rules

N/A

7 Additional information

N/A