

METHODOLOGY NOTE

on the methodology applied for publication of the Transparency Report

1. TRANSPARENCY OF TRANSFERS OF VALUE BETWEEN ORTHO-CLINICAL DIAGNOSTICS ITALY SRL AND HCP/HCO/OTHER THIRD PARTIES

Ortho-Clinical Diagnostics Italy Srl, as associate of Confindustria Dispositivi Medici, adheres to the obligations of the Code of Ethics of the association regarding the publication of transfers of value made directly or indirectly between the company (including the parent company and/or other companies belonging to the group) and healthcare professionals, healthcare organizations and other Italian third parties. Therefore, it makes these data public every year by publishing them according to the Confindustria DM provisions, i.e. by filling in the Transparency Model (Annex 2 of the Confindustria DM Code of Ethics).

2. APPLIED METHODOLOGY

2.1. Data inclusion criteria

For the compilation of the Transparency Form, Ortho-Clinical Diagnostics Italy Srl. has followed the accrual accounting principles, selecting the activities based on the period in which they were carried out.

In addition, following the obligation for which the data concerning transfers of value must be published in the State where the beneficiary is domiciled, the publication also includes the transfers of value operated by the Parent/Subsidiaries and destined, directly or indirectly, to Italian HCP and/or HCO. In the latter case, the contribution made by the parent company/affiliates, is specified and distinguished on the report by the grey color of the corresponding cells in the Transparency Model (Annex 2 of the Confindustria DM Code of Ethics)

2.2. Exclusions

Transfers of value related to promotional material, meals, drinks and product samples are to be considered as exempted from the obligation to publish, therefore not included in the published report, according to the Confindustria DM Code of Ethics

2.3. Tax aspects of value transfer

All data are presented in Euros. In general, disclosed amounts correspond to the taxable base of the transfer of value, excluding the applicable taxes. If applicable tax cannot accurately be excluded, then the full amount of such transfer of value is disclosed, that is to say, the transfers

Ortho-Clinical Diagnostics Italy S.r.l.

Registered office: Viale dell'Innovazione, 3 - 20126 Milan MI - Tel. +39 02 84220300 - Fax. +39 02 84220390

Cap. Soc. € 10.000,00 i.v. with sole shareholder REA 2035767 n° ISCR. Reg. Impr. Milano / C.F. / P.I.

08592930963

EEE Registration No.: IT140700008509 - No. Registration No. Batteries and Accumulators: IT14070P00003569

PEC: ortho-clinical-diagnostics@legalmail.it

orthoclinicaldiagnostics.com



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of value are disclosed in their gross amount. This might be the case of some accommodation expenses and travel related costs, among others.

As far as economic fees are concerned, these are to be intended net of VAT but inclusive of any withholding tax and social security contribution.

2.4. Publication and storage of data

Ortho-Clinical Diagnostics Italy Srl, starting from 2021, will make public annually the data concerning the previous calendar year on the company website, in compliance with the rules on personal data protection.

The information remains in the public domain for a period of at least three years from the time of publication.

Ortho-Clinical Diagnostics Italy Srl keeps the documentation supporting the published data for a period of at least five years.

Data on the interaction between Ortho-Clinical Diagnostics Italy Srl and the individual healthcare professional (HCP) is published on an individual or aggregate basis, detailing the amount of value transfers made during the previous year with reference to:

- costs of participation in training, educational and promotional activities on company products organized by members (excluding meals and drinks);
- fees for consultancy and professional services, including voice-over work, defined by a specific contract indicating the type of service provided, including related travel and hospitality costs (excluding meals and drinks).

If the Health Care Professional does not consent to the processing of personal data, the data is published on an aggregate basis.

Ortho-Clinical Diagnostics Italy Srl keeps, for a period of at least three years, appropriate documentation relating to the consent of the Health Sector Professional to the publication of data concerning him/her.

Data relating to the interaction between Ortho-Clinical Diagnostics Italy Srl and the Healthcare Organization (HCO) or other Third Parties is published on an individual basis with respect to:

- Contribution towards the financing of events (e.g. sponsorship of conferences, congresses and scientific meetings, etc.) designed to meet an educational/training need of a scientific nature (excluding meals and drinks);
- fees for consultancy and professional services, including voice-over work, defined by a specific contract indicating the type of service provided, including related travel and hospitality costs (excluding meals and drinks);
- donations in cash or other goods made to the Health Organization.

Instead, the following transfers of value are published in aggregate form:

- all donations both in cash and in other goods to Third Parties other than the Healthcare Organization.
- expenditure on research and development activities.
- scholarships.

In the case of publication of data in aggregate form, whether relating to HCP or HCO/Third Parties, it will be made identifiable on the Transparency Model (Annex 2 of the Confindustria DM Code of Ethics):

- the number of recipients on an absolute basis and as a percentage of the total number of recipients.
- the aggregate figure attributable to Health Sector Professionals who have not given their consent to data processing.
- the percentage figure of value transfers in aggregate form over total transfers.