

METHODOLOGICAL NOTE

Concerning the disclosure of Transfers of Value to healthcare professionals and organizations, in compliance with Confindustria Dispositivi Medici Code of Conduct.

Legal references on data transparency

In compliance with the transparency provisions contained in the Code of Ethics of Confindustria Dispositivi Medici (hereinafter the "Code"), NTC S.r.l. and NTC Italia s.r.l. (jointly "NTC") document and publish the Value Transfers ("ToV") made, directly and indirectly, to Healthcare Professionals, Healthcare Organizations and third parties. (jointly "NTC") document and publish the Transfers of Value ("ToV") made, directly or indirectly, to Professionals in the Health Care Sector, to Health Care Organisations and to third parties. NTC processes the personal data collected in accordance with the applicable data protection regulations.

Definitions

In accordance with the Code, a ToV is defined as any direct or indirect transfer of value, whether monetary, in kind or otherwise, made, for promotional or non-promotional purposes, in connection with the development and/or sale of medical devices and drugs. This includes, but is not limited to, fees, services, registration fees, sponsorship, travel and provision of hospitality. For other relevant definitions, please refer directly to the Code.

Published data:

Transfers of value made to each Healthcare Organisation or Third Party are published on an individual basis. These include:

- contributions for the funding of events (e.g. sponsorship of conferences, congresses and scientific meetings) aimed at satisfying an educational/training need of a scientific or other nature in accordance with point 2.7.1 and 2.7.2 of the Code of Ethics of Confindustria Dispositivi Medici;
- fees for consultancy and professional services, including voice-over. This includes related travel and hospitality costs;
- donations in cash or other goods made to the Health Organisation.

Transfers of value to the individual health professional (HCP) are also published, with reference to:

- costs of participation in training, educational and promotional activities (excluding meals and drinks);
- fees for consultancy and professional services, including voice-over, including related travel and hospitality expenses (excluding meals and drinks).

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

What does aggregated data refer to

For transfers of value, which cannot be disclosed on an individual basis due to lack of consent, the amounts attributable to such transfers will be published on an aggregate basis.

In all cases where it is necessary to publish data on an aggregate basis for each of the categories identified in the preceding paragraphs, it will be identifiable:

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

The following transfers of value are also published in aggregate form:

- donations in cash or other goods to third parties other than the Healthcare Organisation;
- Research and Development (R&D) expenses;
- Scholarships.

Application methods

- NTC publishes data on direct and indirect Value Transfers to Healthcare Professionals and Healthcare Organisations on its corporate website (<https://www.ntcpharma.com>), in the "Ethics&Transparency" section.
- The amounts published refer to Value Transfers to Healthcare Professionals and Healthcare Organisations (or to subjects designated by them) having their domicile in Italy. Should the data refer to a beneficiary who is domiciled in a country other than Italy, the rules set out in the Code of Ethics of the country of reference shall be followed.
- NTC has chosen to adopt the cash basis for the publication of TOVs.
- Amounts relating to Transfers of Value are expressed in Euros, are exclusive of VAT (except for transactions for which VAT is non-deductible under tax law) and include any withholding tax.
- The "address where the Health Care Worker's profession/activity is mainly carried out" is given as the most recent address in our database at the time of publication.

Model maintenance and post-publication corrections

NTC has worked with the utmost diligence to ensure that all information published is correct and consistent with the requirements of the Code of Ethics of Confindustria Dispositivi Medici. If, despite its best efforts, any inaccuracies should be found, NTC undertakes, as of now, to carry out the necessary checks in order to make the necessary corrections.

General assessment

The amounts of the disclosed transfers of value are not to be used for the purposes of the tax declaration of the recipient, who will receive from NTC the certifications required by the regulations in force. The information in the value transfer tables reflects the willingness and efforts made to comply with the requirements of the Confindustria Medical Devices Code of Ethics on Value Transfer Transparency.

In order to ensure compliance with privacy regulations, the published data may not be indexed on search engines.

Useful links:

<https://www.ntcpharma.com/ethics-transparency/tranfers-of-values>

<https://www.confindustriadm.it/codice-etico/>

<https://www.garanteprivacy.it>