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ENGLISH VERSION

METHODOLOGICAL NOTE
concerning the disclosure of Transfers of Value to healthcare professionals and organizations, in compliance with Egualia Code of Conduct

Introduction

In accordance with the provisions on data transparency set forth in the **Code of Conduct of Egualia**[1] (hereinafter the "**Code**"), **NTC S.r.l.** ("**NTC**") must document and disclose all Transfers of Value ("**ToV**"), whether directly or indirectly, to Healthcare Professionals and Organizations.
NTC processes all personal data collected in compliance with current data protection legislation.

Goal of the methodological note

NTC thinks that the relationship between the pharmaceutical industry and the scientific sector should be based on transparency, which is a precondition for a mutual and correct collaboration, a tangible confirmation of the integrity and legitimacy of pharmaceutical companies.
This document intends to summarize all disclosing methods and the relevant business decisions in order to identify, collect and report ToVs for every category described in Chapter V of the Code.

Definitions

According to the Code, ToVs include direct or indirect transfer, whether in cash or in kind, made for promotional purposes or in connection with the development and sale of prescription-only medicines for human use. Direct Transfers are those made directly by a company for the benefit of a recipient. Indirect Transfers are those made on behalf of a company through a third party. For other definitions, please consult the Code.

Published data

NTC discloses ToVs concerning the following events and activities, which were paid during the previous calendar year, namely:

- Fees for services and reimbursements of out-of-pockets expenses to Healthcare Professionals, contributions to costs and sponsorship for Healthcare Organizations;
- Transfers of value concerning travel (e.g. flight tickets), accommodation (e.g. hotel room cost) and registration fees to conferences/congresses;
- Payment of the said categories through third parties. In this case, the date of payment coincides with the date of payment to third parties.
- Provider/Organization management costs:
  Values in relation to the accommodation of Healthcare Professionals (ticket management fees and hotel reservation) are calculated net of the agency fee. Provider/Organization's cost management data is published in relation to Healthcare Organizations (sponsorship agreements with healthcare organizations/third parties appointed by healthcare organizations to create events).

[1] Egualia Code of Conduct was adopted according to the document called "List of Guiding Principles Promoting Good Governance in the Pharmaceutical Sector under the Corporate Social Responsibility Platform by the European Commission", and to Medicines for Europe Code of Conduct ("Medicines for Europe Code of Conduct on Interactions with the Healthcare Community") of which Egualia is an ordinary member.

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Further details on payments

All ToVs are expressed in Euros, they have to be considered net of VAT (except for transactions for which VAT is non-deductible under tax law) and include, instead, any withholding taxes.

What does aggregate data refer to

According to the Code, transfers of value to healthcare organizations must be disclosed in aggregate (see Annex 2 of the Egualia Code) in relation to:

- donations, contributions (including loans for use) both in cash and in kind;
- direct and indirect funding of conference events, made through healthcare organizations or third parties, including the sponsorship of doctors at conferences and congresses with payment of their registration fee or travel and hospitality expenses;
  economic transactions concerning consultancy and professional services set forth in a written contract between a pharmaceutical company and Institutions, Organizations or Associations providing any type of service not included in the above-mentioned categories.

Measures to ensure compliance with data privacy requirements

As for the data of Healthcare Professionals, NTC discloses data in letter a) of the table in an anonymous way and by adopting Option 2 specified in article 8.4 of the Code. Consequently, under the current legislation on the protection of personal data, the consent of the Healthcare Professionals is not required.

Application methods

NTC discloses data concerning direct and indirect Transfers of Value made to Healthcare Professionals and Organizations on its corporate website (https://www.ntcpharma.com), under the section "*Ethics & Transparency* > *Transfers of Values*".

All disclosed amounts refer to Transfers of Value to Healthcare Professionals and Healthcare Organizations (or to bodies appointed by this latter) having their domicile in Italy. If data refers to a recipient having its domicile in a country other than Italy, the rules set forth in the Code of Conduct of the country of reference will be followed.

NTC decided to adopt the cash basis criterion for the ToVs publication.

Address where the profession/activity of Healthcare Professional is mainly carried out

The most recent address that can be found in our database at the time of disclosure is given here.

Keeping the Model and after-disclosure corrections

NTC worked with the utmost diligence to ensure that all information published is correct and consistent with the requirements of Egualia Code of Conduct. If, despite the efforts made, inaccuracies are 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 transfers of value disclosed must not be used for the tax declaration of the recipient, who will receive from NTC the certifications required by the regulations in force.

The information in the "transfers of value" tables reflects the will and efforts made to comply with the requirements of Egualia Code of Conduct (art.8) on the transparency of transfers of value.

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

Useful links

https://www.ntcpharma.com/ethics-transparency/transfer-of-values
https://www.egualia.it/it/associazione/governance-e-deontologia.html
www.garanteprivacy.it

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