

Methodology Memo 2021: Italy Transparency Code (Confindustria Dispositivi Medici)

In accordance with Section 4 within Confindustria Dispositivi Medici [Code of Ethics](#) members including BD must document and publish all direct and indirect transfers of value to Healthcare Professionals (“HCP”), Healthcare Organizations (“HCO”) and 3rd Parties by means of a specific Transparency Template (Code of Ethics - Annex 2) on an annual basis.

BD shall publish this data yearly on the BD corporate website [BD Transparency](#) page in compliance with Confindustria Dispositivi Medici. BD will publish by June 30th of each year, retaining this data for three years and all subsequent supporting data for five years.

Transactions In Scope for Disclosure: The value of any direct or indirect transfers of value made to a HCP, HCO, or 3rd Parties in the disclosure year associated with:

- The recipient’s participation in training, educational, or promotional events on BD’s products organized by BD excluding (meals and beverages); or,
- Fees or consultancy activities and professional services, including speaking services, specifically contracted between BD and the recipient, including the related travel accommodation costs (excluding meals and beverages).

Transactions Out of Scope for Disclosure: Any transfer made to an HCP / HCO / or 3rd Party which is not considered In Scope (see above) are excluded from publication obligations. Examples of Out of Scope transfers of value include:

- Meals and Beverages
- Gifts/Entertainment
- Double Blinded Market Research
- Product Grants or Grants of Public Awareness Campaigns
- Items of value not associated with Training/Educational/Promotional events
- Product Samples
- Evaluation/Demonstration Loaner Devices
- Royalties and Licensing Fees
- Rebates and Discounts

Currency & VAT: BD will disclose all transfer of values in Euros (local currency) applying BD monthly exchange rates, as necessary, without VAT.

Consent of Data Subject: BD collects consent upfront through clauses in our contracts with all HCPs. Any subsequent revocation of consent is sent to and captured in the BD GDPR mailbox then included in the publication of this data on an aggregate basis per the code of Ethics (Section 4.3).

Data Gathering & Management: Required information for reporting transfers of value to reportable recipients is collected within BD's systems of record. Supporting documentation (e.g., invoices, contracts) is reviewed for every transfer of value to make a determination of 1) whether the recipient is reportable, and 2) whether the transfer of value is reportable based on Code guidance and BD legal determinations. If any additional information is required for reporting and not captured in BD's systems

of record or supporting documentation, BD business stakeholders are responsible for providing this information.

BD Contact Info: Please contact the Data Coordinator via the GDPR email.

BD Italia S.p.A

Data Coordinator

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