

Methodology Memo 2025: Italy Transparency Obligations (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 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 and accommodation costs (excluding meals and beverages).
- Financial support to events (e.g., sponsorship of conventions, congresses and scientific meetings, etc.) aimed at meeting a scientific or other educational/ training need (excluding meals and beverages).
- Donations in cash or cash equivalents provided to the Healthcare Organization.
- Donations in cash and cash equivalents to Third Parties, other than the Healthcare Organization.
- Costs for research and development activities.
- Scholarships.

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
- Product Samples
- Evaluation/Demonstration Loaner Devices
- Royalties and Licensing Fees
- Rebates and Discount

Currency, Accounting Principle & VAT: BD will disclose all transfer of values in Euros (local currency) applying BD monthly exchange rates, as necessary, with VAT. Publications are based on the cash accounting principle.

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 system of record. Supporting documentation (e.g., invoices, contracts) is reviewed for every transfer of value to decide 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 email address below.

Becton Dickinson Italia S.p.A.

Data Coordinator

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