

Methodology Memo 2022: Italy Transparency Code (Confindustria Dispositivi Medici)

In accordance with Section 4 within Confindustria Dispositivi Medici Code of Ethics members including Cardinal Health 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 on an annual basis.

Cardinal Health shall publish this data yearly on the Confindustria Dispositivi Medici website page in compliance with Confindustria Dispositivi Medici rules. Cardinal Health 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 Cardinal Health’s products organized by Cardinal Health excluding (meals and beverages); or,
- Fees or consultancy activities and professional services, including speaking services, specifically contracted between Cardinal Health 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
- 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: Cardinal Health will disclose all transfer of values in Euros applying Cardinal Health monthly exchange rates, as necessary, without VAT.

Consent of Data Subject: Cardinal Health collects consent upfront through a specific template. Any subsequent revocation of consent is sent to and captured in the Cardinal Health GDPR mailbox then included in the publication of this data on an aggregate basis per the code of Ethics.

Data Gathering & Management: Required information for reporting transfers of value to reportable recipients is collected within Cardinal Health'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 Cardinal Health legal determinations. If any additional information is required for reporting and not

captured in Cardinal Health's systems of record or supporting documentation, Cardinal Health business stakeholders are responsible for providing this information.

Cardinal Health Contact Info:

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