

Start Promotions Events - Pop	Milano	Italy	Via Mauro Macchi 50	0.00	0.00	0.00	0.00	0.00	0.00	6000.00	0.00	0.00	0.00	0.00	0.00	0.00	6000.00
Reclutatori Srl	Aversa	Italy	Via Vittorio Emanuele 32	0.00	0.00	0.00	0.00	0.00	0.00	2000.00	0.00	0.00	0.00	0.00	0.00	0.00	2000.00
Summavit S.R.L.	Vercelli	Italy	Via Paolo Massimo 5	0.00	0.00	6800.00	0.00	0.00	0.00	4000.00	0.00	0.00	0.00	0.00	0.00	0.00	6800.00
Trasporti Scl	Genova	Italy	Via Cenisia 2/24	0.00	0.00	30000.00	0.00	0.00	0.00	15000.00	0.00	0.00	0.00	0.00	0.00	0.00	30000.00
Univas Formazioni S.r.l.	Roma	Italy	Via Petros. Antonio Micheli 86	0.00	0.00	0.00	0.00	0.00	0.00	4000.00	0.00	0.00	0.00	0.00	0.00	0.00	4000.00
Univas S.R.L.	Roma	Italy	Viale Maresciallo Diaz 13	0.00	0.00	0.00	0.00	0.00	0.00	10000.00	0.00	0.00	0.00	0.00	0.00	0.00	10000.00
Università Carlo Cattaneo - Iseo	Castellanza	Italy	Università Carlo Cattaneo - Iseo Via Giuseppe Martignetti 22	0.00	15000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15000.00
Università Degli Studi Di Catania / Facoltà Di Medicina	Catania	Italy	Università Degli Studi Di Catania / Facoltà Di Medicina Via Sclafani 86	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Università Degli Studi Di Napoli Federico II	Napoli	Italy	Via Sergio Panini 5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10000.00	0.00	2000.00	3000.00
Università Degli Studi Di Padova	Padova	Italy	Università Degli Studi Di Padova Diparti Di Medicina Via Marconi Giustiniani 2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	48888.64
Università Degli Studi Di Palermo / Facoltà Di Medicina	Palermo	Italy	Via Der Vignola 379	0.00	0.00	1000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1000.00
Università Degli Studi Di Pisa	Pisa	Italy	Lungotevere Antonio Rosselli 43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10000.00
Università Degli Studi Di Torino - Unità / Facoltà Di Medicina	Torino	Italy	Università Degli Studi Di Torino - Unità / Facoltà Di Medicina Corso Re Umberto I 60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27000.00
Università Degli Studi La Sapienza	Roma	Italy	Piazzale Aldo Moro 5	0.00	24000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24000.00
Università Di Torino	Torino	Italy	Corso Amedeo Savoia Orientale 54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13200.00
Università Politecnica Della Marche	Ancona	Italy	Corso Via Francesco Sforza	0.00	0.00	13000.00	0.00	0.00	0.00	13000.00	0.00	0.00	0.00	0.00	0.00	0.00	40918.00
University of Palermo, Department of Epidemiology	Palermo	Italy	University Of Palermo, Department Of Epidemiology Viale Delle Scienze	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8000.00
Victoria Praxair Concessaria Srl	Milano	Italy	Via Fratelli Bionzatti 20	0.00	0.00	8510.00	0.00	0.00	0.00	13000.00	0.00	0.00	0.00	0.00	0.00	0.00	22510.00
Wombab Srl Unipersonale	Torino	Italy	Wombab Srl Unipersonale Corso Giuseppe Martignetti 38	0.00	0.00	0.00	0.00	0.00	0.00	10000.00	0.00	0.00	0.00	0.00	0.00	0.00	10000.00
DATI SU BASE AGGREGATA																	
Aggregate amount attributable to transfers of value to such Recipients <i>Dati aggregati attribuibili a trasferimenti di valore a tali Destinatari</i>				100000.00	269090.00	470938.20	305.33	5045.33	476626.23	NA	1545.45	NA	46901.25	NA	257884.44	6228936.33	
Number of Recipients in aggregate disclosure <i>Numero dei Destinatari i cui dati sono pubblicati in forma aggregata</i>				1	10	36	1	3	36	NA	2	NA	31	NA	17	119	
% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed <i>% del numero di Destinatari inclusi nei dati aggregati nel numero complessivo dei Destinatari</i>				100%	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
<i>Nei casi di supporto diretto per la formazione di HCP che esercitano in ambito privato, occorrerà pubblicare il dato in forma individuale o aggregata, a seconda che l'HCP abbiamo prestato il consenso.</i>																	

Organizzazioni Ambare e Torone
S.p.A.



Edwards Lifesciences Transparency Disclosure

Methodology Note

Purpose of the Methodology Note

This document is intended to serve as supporting documentation to help understand the methodology used in the scoping, extraction, possession and disclosure of the Confindustria transparency disclosure.

The Methodology Note summarizes the logic used to identify, collect and report all transfers of value within the scope of points 4.1 to 4.4 of the Code Of Ethics from Confindustria Dispositivo Medici. This includes but is not limited to:

- Definitions
- Scope of reportable payments
- Identification of reportable payments
- Aggregate disclosure
- Financial aspects - VAT and currency
- Handling of cross-border payments

Definitions

Recipients

Health Care Organization (“HCO”): Means any legal entity or body (irrespective of its legal or organizational form) that is a healthcare, medical or scientific association or organization which may have a direct or indirect influence on the prescription, recommendation, purchase, order, supply, utilization, sale or lease of medical technologies or related services such as a hospital or group purchasing organization, clinic, laboratory, pharmacy, research institution, medical society, medical charity, foundation, university or other teaching institution or learned or professional society (except for patient organizations); or through which one or more Healthcare Professionals provide services.

Health Care Professional (“HCP”): Individuals that purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe medical technology products. This definition encompasses anyone who may have influence over purchasing decisions and includes both clinical and non-clinical individuals who make product-related decisions and decision-makers within group purchasing organizations.

Third Parties: legal entities non-profit or for profit such as but not limited to Patient Organizations, Charities and Professional Congress Organizers (PCOs).

Methodologies used for disclosure purposes

Scope of reportable payments

In accordance with point 4 of the Code Of Ethics from Confindustria Dispositive Medici, “Transparency of transfers of value between the associates, healthcare professionals, healthcare organisations and other third parties” Edwards will disclose:

HCPs	<ul style="list-style-type: none">• Cost for participation in company organized events (training, educational or promotional) and third party organized procedure training sessions• Fees for services (including travel and accommodation expenses)
HCOs	<ul style="list-style-type: none">• Financial support to events as described in paragraphs 2.7.1 and 2.7.2 (this includes indirect support for HCP attendance to third party events)• Fees for services• Donations in cash or cash equivalents• Cost for research and development activities• Scholarships
Third Parties	<ul style="list-style-type: none">• Donations in cash or cash equivalents

All transfer of value to HCPs and Third Parties are disclosed in aggregate basis. Transfer of value related to HCOs are reported on individual basis. Transfer of value regarding meals or beverages are not included in t

Identification of reportable payments

Identification of reportable data: Every type of transfer of value processed in Edwards processes a related commodity code. Based on these codes, all payments within the scope of Confindustria’s transparency obligations are identified and included in the report.



Aggregate Disclosure

All transfer of value to HCPs and Third Parties are disclosed in aggregate basis. Each payment category has its own code which will be used as explained above under “Identification of reportable data”. Itemized disclosure will be made available upon request.

VAT rules

All fee related payments and expenses related to travel and accommodation are inclusive of VAT. Transactions related to support to HCO and Third Party organized events do not include VAT. All VAT related charges will be applied based on local VAT laws and rules.

Currency

All transfers of value are converted to EUR using the international exchange rate valid at the day of the report’s publication.