

MODELLO TRASPARENZA										ALL 2												TOTAL	
Full Name Nome e Cognome / Denominazione	HCPs City of Principal Practice HCOs City where registered Organizzazione Sanitaria/ Terza Parte, Sede Legale	Country of Principal Practice Stato dove viene prevalentemente la professione/attività	Principal Practice Address Indirizzo dove viene svolta prevalentemente la professione/attività	Donations Donazioni in denaro o altri beni	Scholarship Borse di Studio	Contribution to costs of Events Contributo per il finanziamento di eventi (ex. convegni, congressi e riunioni scientifiche)			Contribution to costs of Training Contributo per il finanziamento di training practice			Spese di partecipazione ad attività formative, educative e promozionali su prodotti aziendali organizzate da	Fees for service and consultancy Corrispettivi per prestazioni professionali e consulenze		Transfers of Value Research & Development Trasferimenti di valore per Ricerca & Sviluppo	TOTAL Totale							
						Sponsorship agreements with HCOs/Third Parties appointed by HCOs to manage an event Accordi di sponsorizzazione con organizzazioni sanitarie/ Terza Parte per la realizzazione di eventi	Registration Fees Quote di iscrizione	Travel & Accommodation Viaggi e ospitalità	Sponsorship agreements with HCOs/Third Parties appointed by HCOs to manage an event Accordi di sponsorizzazione con organizzazioni sanitarie/ Terza Parte per la realizzazione di eventi	Registration Fees Quote di iscrizione	Travel & Accommodation Viaggi e ospitalità		Fees Corrispettivi	Related expenses agreed in the fee for service or consultancy contract, including travel & accommodation relevant to the contract Spese riferibili ad attività di consulenza e prestazioni professionali (riscatti) da una specifica attività, comprese di relative spese viaggio e ospitalità									
HCPs Professional Sanitari	DATI SU BASE AGGREGATA (per Professionisti Sanitari)																						
	Aggregate amount attributable to transfers of value to such Recipients Dato aggregato attribuibile a trasferimenti di valore a tali Destinatari				0.00	0.00	0.00	2479.14	5490.62	0.00	0.00	180503.51	0.00	611339.54	153212.67	0.00	953025.48						
	Number of Recipients in aggregate disclosure Numero dei Destinatari (con dati sono indicati) in forma aggregata				0	0	0	7	11	0	0	294	0	90	31	0	337						
	% of the number of Recipients included in the aggregate disclosure in the total number of Recipients disclosed % del numero di Destinatari inclusi nel dato aggregato sul numero complessivo dei Destinatari				0.00%	0.00%	0.00%	2.08%	3.26%	0.00%	0.00%	87.24%	0.00%	26.71%	9.20%	0.00%	100.00%						
DATI SU BASE INDIVIDUALE (una riga per ciascuna organizzazione sanitaria (ovvero anche indicata l'importo complessivo di tutti i trasferimenti di valore effettuati nell'arco dell'anno a favore dell'organizzazione sanitaria) e dettagliato su una riga disponibile solo per il singolo Destinatario e per la Autorità																							
Humana University	Vimodrone	Italy	Via Santa Rita 4, Vimodrone, 20090, Italy	0.00	0.00	5000.00	0.00	0.00	0.00	0.00	0.00	0.00	29282.00	0.00	0.00	34282.00							
Università degli Studi di Torino - UNITO	Torino	Italy	Corso Bramante 88/90, Torino, 10126, Italy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6600.00							
Intermeeting Srl	Bari	Italy	Via Giovanni Amerigo 17/27, Bari, 70124, Italy	0.00	57000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	57000.00							
Reuma Srl Unipersonale	Reggio	Italy	Via degli Orfei/1, 4, Bologna, 40124, Italy	0.00	0.00	30634.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	30634.44							
SMITT - Istituto Mediterraneo per i Trapianti e Terapie ad Alta Specializzazione	Palermo	Italy	Via Ernesto Tricomi 5, Palermo, 90127, Italy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14500.00	0.00	2208.60	16708.60							
Start Promotion Eventi	Milano	Italy	Via Mauro Macchi 50, Milano, 20124, Italy	0.00	0.00	35830.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	35830.00							
MMGroup International - AM Congress	Milano	Italy	Via Giuseppe Ripamonti 120, Milano, 20141, Italy	0.00	0.00	34162.00	0.00	0.00	1700.00	0.00	0.00	0.00	0.00	0.00	0.00	35864.00							
Gra Società Italiana Di Cardiologia	Milano	Italy	Via Conservatorio 22, Milano, 20122, Italy	0.00	5000.00	87990.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	92090.00							
Opediate San Raffaele S.R.L.	Milano	Italy	Via Olgettina 60, Milano, 20132, Italy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1391.00							
Policlinico San Donato	San Donato Milanese	Italy	Via Rodolfo Merelli 30, San Donato Milanese, 20097, Italy	0.00	0.00	12000.00	0.00	0.00	0.00	0.00	0.00	26522.00	2500.00	0.00	6603.00	47627.00							
Fondazione Toscana Gabriele Moncalvo	Pisa	Italy	Via Trieste 41, Pisa, 55126, Italy	0.00	0.00	1264.55	0.00	0.00	8002.00	0.00	0.00	66645.36	633.42	24981.20	101127.03								
Centro Cardiologico Moncalvo	Milano	Italy	Via Carlo Farini 4, Milano, 20138, Italy	0.00	0.00	10000.00	0.00	0.00	0.00	0.00	0.00	6600.00	0.00	0.00	0.00	16600.00							
Medica Srl Unipersonale	Roma	Italy	Viale Dell' Università 11, Roma, 00185, Italy	0.00	0.00	24000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24000.00							
Politecnico University of Marche	Ancona	Italy	Via Trieste 10/8, Ancona, 60126, Italy	0.00	24000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24700.00	9489.04	0.00	33189.04							
Opediate Maurizio Di Torino	Torino	Italy	Largo Filippo Turati 62, Torino, 10128, Italy	0.00	0.00	30238.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	30238.00							
Asenda Uita, N. 2 Marca Trevigiana	Treviso	Italy	Via Sant'Antonio Di Fiera 37, Treviso, 31100, Italy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2509.50							
Spedati Civili di Brescia	Brescia	Italy	Piazzale Spedati Civili 1, Brescia, 25123, Italy	0.00	0.00	15000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15000.00							
Opediate Civile SS. Annunziata	Sassari	Italy	Riviera Via Enrico De Nicola 15, Sassari, 07100, Italy	0.00	0.00	20000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20000.00							
Humana Gaviarani	Bergamo	Italy	Via Mauro Giovanni 31, Bergamo, 24125, Italy	0.00	0.00	0.00	0.00	0.00	2008.20	0.00	0.00	0.00	0.00	0.00	0.00	2008.20							
Opediate San Paolo San Paolo	Savona	Italy	Via Salaria 50, Savona, 17100, Italy	0.00	0.00	4000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4000.00							
A.O. San Camillo Forlani	Roma	Italy	Corso Venezia Giustiniani 17, Roma, 00123, Italy	0.00	0.00	33000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1920.91	34920.91							
A.O. di Pavia - Ospedale Carlo Maria della Mantova	Pavia	Italy	Piazzale Giorgio Mengoni 1, Pavia, 04129, Italy	0.00	0.00	7500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2500.00							
P.O. - Policlinico di Bari	Bari	Italy	Piazzale Giorgio Cesare 11, Bari, 70124, Italy	0.00	0.00	2500.00	0.00	0.00	1431.00	0.00	0.00	0.00	0.00	0.00	0.00	1431.00							
A.O. Università Integrata Verona	Verona	Italy	Via Trieste 11, Verona, 37126, Italy	0.00	0.00	2500.00	0.00	0.00	17200.00	0.00	0.00	0.00	0.00	0.00	0.00	17200.00							
Fondazione IRCCS Policlinico San Matteo	Pavia	Italy	Viale Camillo Golgi 19, Pavia, 27100, Italy	0.00	0.00	4000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4000.00							
Istituto Ospedaliero Ospedali Galliera	Genova	Italy	Mura Delle Cappuccine 14, Genova, 16128, Italy	0.00	0.00	3500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3500.00							
A.O. Santa Maria di Terni	Terni	Italy	Viale Trinitario Di Iannuccio 1, Terni, 05100, Italy	0.00	0.00	1500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1500.00							
A.O. Ordine Maurizio Ospedale Umberto I	Torino	Italy	Via Ferdinando Magliano 1, Torino, 10128, Italy	0.00	0.00	12535.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12535.00							
IRCCS Policlinico S. Donato	San Donato Milanese	Italy	Via Salaria 50, San Donato Milanese, 20097, Italy	0.00	0.00	18000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18000.00							
A.O. S. Anna S. Sebastiano di Caserta	Caserta	Italy	Via Salaria 50, Caserta, 81100, Italy	0.00	0.00	2000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2000.00							
Fondazione Casa Sollievo della Sofferenza	San Giovanni Rotondo	Italy	Viale Convento Cappuccini 1, San Giovanni Rotondo, 71013, Italy	0.00	0.00	2000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2000.00							
Opediate S. Maria degli Angeli di Portofino	Portofino	Italy	Via Montemarle 24, Portofino, 31170, Italy	0.00	0.00	1500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1500.00							
Fondazione Poliambulanza Istituto Ospedaliero	Brescia	Italy	Via Leonida Bissolati 57, Brescia, 25124, Italy	0.00	0.00	12000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12000.00							
Opediate Civile Giuseppe Mezzini	Torino	Italy	Piazzale Italia 1, Torino, 10100, Italy	0.00	0.00	10000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10000.00							
IRCCS Humanitas Research Hospital	Robbiano	Italy	Via Alessandro Manzoni 56, Robbiano, 20089, Italy	0.00	0.00	8000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8000.00							
UNIVERSITA DI BOLOGNA	Bologna	Italy	VIA MASSARETTI 9, Bologna, 40138, Italy	0.00	10000.00	8000.00	0.00	0.00	0.00	0.00	0.00	14300.00	0.00	0.00	0.00	47300.00							
Fondazione Italiana Per il Cuore	Milano	Italy	Viale Piave 15, Milano, 20129, Italy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1002.00	0.00	0.00	0.00	1002.00							
As. Osp. Univ. Mater Domini	Canicatt	Italy	Via Tommaso Campanella 115, Canicatt, 88100, Italy	0.00	0.00	1500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1500.00							
Univita Italiana di Cardiologia Geriatrica - ICGG	Firenze	Italy	Via Giuseppe Matteotti 7, Firenze, 50121, Italy	0.00	0.00	9000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9000.00							
UET Lega Italiana per la Lotta contro i Tumori	Milano	Italy	Via Salaria 50, Milano, 20133, Italy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3160.00	0.00	0.00	3160.00							
ISC	Roma	Italy	Via Po, 24, Roma, 00198, Italy	0.00	0.00	25000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	25000.00							
Università degli Studi Magna Graecia - UMG	Catanzaro	Italy	Viale Europa 30, Catanzaro, 88100, Italy	0.00	0.00	10000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10000.00							
SAARIT - Società Italiana di Anestesia Analgesia Rianimazione e Terapia Intensiva	Roma	Italy	Viale Dell' Università 11, Roma, 00185, Italy	0.00	0.00	11661.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11661.50							
Associations Regionali Cardiologi Ambrosiani	Verona	Italy	Viale Salaria 50, Verona, 37134, Italy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4300.00							
A.R.C.A. - Associazioni Regionali Cardiologi Ambrosiani	Roma	Italy	Viale Bruno Buozzi 56, Roma, 00197, Italy	0.00	0.00	42500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	42500.00							
SMIT Italia Srl	Roma	Italy	Via Salaria 50, Roma, 00196, Italy	0.00	0.00	71236.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	71236.36							
Presidio Ospedale Rotondico	Catania	Italy	Via Salaria 78, Catania, 95123, Italy	0.00	0.00	15000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15000.00							
ISTITUTO ANATOLOGICO ITALIANO	Milano	Italy	Piazzale Brescia 20, Milano, 20140, Italy	0.00	0.00	4000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4000.00							
HOLD GROUP EVENTI SRL	Monza	Italy	Via Vittorio Veneto 11, Monza, 20101, Italy	0.00	0.00	0.00	0.00	0.00	8000.00	0.00	0.00	0.00	0.00	0.00	0.00	8000.00							
IRCCS di Assistenza Sanitaria Università Giuliana	Trieste	Italy	Via Cavour 10, Trieste, 34128, Italy	0.00	0.00	20000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20000.00							
Associazione Casa Nuova ITS	Roma	Italy	Viale Cavour 10, Roma, 00179, Italy	0.00	71970.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	71970.00							
ANIRCA CORPORA IRCCS UNIVERSITA' LA SAPIENZA	Roma	Italy	Via Salaria 50, Roma, 00185, Italy	0.00	0.00	8000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8000.00							
ANIRCA - Associazione Nazionale Medici Cardiologi Ospedalieri	Firenze																						



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, prosession 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 Dispositive 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	• 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	• 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	• 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.