

Disclosure of Transfers of Value

Methodological Note

Country	ITALY
Entity (Company?) Name	FRESENIUS KABI ITALIA SRL
Legal Basis for	
Disclosure	Confindustria Medical Devices Code of Ethics, published June 2020.
Reporting Period	2020
Currency of disclosed	All values are disclosed in
values	⊠ EUR
	□ [local currency, if required]
Scope of disclosure	The principle of Transparency applies to Transfers of Value (ToV) made directly or indirectly to Healthcare Professionals, Healthcare Organizations and Third Parties. Transfers of Value related to promotional material, meals, drinks and product samples are excluded from the obligation of disclosure.
Value identification and Recognition	All disclosed amounts are based on Transfers of Value made in the respective category, for the benefit of a specific recipient and according to the accrual basis.
Multi-Year Contracts	In the context of multi-year contracts, only transfers of value are published according to the accrual basis.
Transfers of Value disclosed for:	All Transfers of Value are disclosed according to the following principle:
	Transfers of Value provided by Fresenius Kabi Italia S.r.l. to the beneficiary. The promoter of the training-educational part, i.e. Provider or Healthcare Organizations (HCOs) where applicable (Confindustria Medical Devices Code of Ethics) should be considered as the ultimate beneficiary of the support.
VAT and other taxes	All amounts are disclosed excluding VAT or similar service taxes, when applicable.
Disclosure location:	www.fresenius-kabi.com/it/azienda/trasparenza

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Categories of Transfers of Value: "Healthcare Professionals"

The company disloses the ToV indicated in the category according to point 4.3. of the transparency requirements of Confindustria Medical Devices:

- expenses for educational, promotional and standalone activities;
- Fees for consultancy and professional services, including speaker fees, and related travel and hospitality expenses.

Data disclosure must take place on an individual basis or in aggregate form, depending on whether or not the healthcare professional has given his or her consent to the processing of personal data.

In all cases where disclosure of data on an aggregate basis is necessary, the following must be identifiable:

- the number of recipients on an absolute basis and as a percentage of the total recipients;
- the aggregate data ascribable to HCPs who have not given their consent to the processing of data;
- the percentage figure of ToV in aggregate form on the total of transfers.

Categories of Transfers of Value: "Healthcare Organizations or Third Parties"

The company discloses the Transfers of Value indicated in the category according to points 4.4. and 4.5. of the transparency requirements of Confindustria Medical Devices:

In individual form

- contribution for the financing of events (eg.: sponsorship of conferences, congresses and scientific meetings, etc.) that satisfy an educational / training need of a scientific nature;
- fees for consultancy and professional services, including speaker fees andrelated travel and hospitality expenses;
- donations either in monetary payments or in-kind benefits provided to Healthcare Organizations;

In aggregate form

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- donations either in monetary payments or in-kind benefits provided to Third Parties (other than Healthcare Organizations);
- expenses for research and development activities and scholarships;

In all cases where it is necessary to disclose data on an aggregate basis for each of the categories identified in the previous points, the following must be identifiable:

- the number of recipients on an absolute basis and as a percentage of the total recipients;
- the aggregate data attributable to Healthcare Professionals who have not given their consent to the processing of data;
- the percentage figure of ToV in aggregate form on total transfers.

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