

**SUMMARY NOTE**  
**On the methods of publication of the Transparency Form**  
**and the methodology used to prepare the data**

**1 - Transparency of transfers relating to professional services**

Sentinel CH. S.p.A. adheres to the definition of transfers of value as provided for by the Code of Ethics of Confindustria Medical Devices.

The Transparency Module therefore provides for the inclusion of data relating to the transfers of value made by Sentinel CH. S.p.A. directly or indirectly in favor of Healthcare Professionals, Healthcare Organizations and Third Parties.

In particular, regarding our relations with Healthcare Professionals, the amount of transfers of value made during the previous year is published on an individual basis for each recipient, or in aggregate form in the event of non-consent to publication, with reference to:

- a. expenses for participation in training, educational and promotional activities on company products organized by Sentinel CH. S.p.A. (excluding meals and drinks);
- b. fees for consultancy and professional services, including voice-overs, including related travel and hospitality expenses (excluding meals and drinks).

With reference to relations with health organizations and other third parties, the amount of transfers of value made to each health organization or other third parties is published on an individual basis as follows:

- a. contribution to the financing of events (eg sponsorship of conferences, congresses and scientific meetings, etc.) aimed at satisfying an educational / training need of a scientific or other nature (excluding meals and drinks);
- b. fees for consultancy and professional services, including voice-overs including related travel and hospitality expenses (excluding meals and drinks);
- c. donations both in cash and in other goods provided to the Health Organization.

Publication of other data in aggregate form

The publication in aggregate form of the following transfers of value is also envisaged:

- a. all donations, both in cash and in other assets in favor of Third Parties, other than the Health Organization;
- b. expenses for research and development activities;
- c. scholarships.

**2 - Data extraction criteria**

For the completion of the Transparency Form on Transfers of Value, Sentinel CH. S.p.A. followed the cash criterion, meaning it selected the assets for which it published the data on the basis of the period in which the corresponding sums were paid. This is regardless of when the service was actually carried out. For this reason, an activity that took place in December and for which the consideration was paid in January of the following year will not fall within the *disclosure* relating to the previous year.

**3 - Transfers of value not included in the *disclosure***

Sentinel CH. S.p.A. follows the definitions and requirements established by the Confindustria Medical Devices Code of Ethics and therefore makes all transfers of value public. Transfers of value

relating to promotional material, meals, drinks and product samples are excluded from the obligation to be published.

#### **4 - Currency**

The data is presented in Euro.

#### **5 - Management of VAT and withholding tax**

In general, all amounts are to be understood net of VAT. On some occasions, travel and accommodation costs may include VAT, for example in cases where the Healthcare Operator has directly paid for his stay. .

With regard to economic remuneration, these are to be understood net of VAT. but inclusive of any withholding tax and social security contribution.

#### **6 - Protection of personal data of Healthcare Professionals**

Healthcare professionals are, like any other member of the company, protected by European and national privacy laws.

Healthcare Professionals with whom a transfer of value takes place, in the context of relations with Sentinel CH. S.p.A., are requested, by means of a specific informed consent, to consent to the publication of such transfers on the Sentinel CH website. S.p.A. .

Sentinel CH. S.p.A. puts in place all reasonable efforts to obtain the highest level of positive consent from Healthcare Operators, in order to achieve the transparency objectives set out in the Confindustria Medical Devices Code of Ethics.

If, for any reason, a consent authorizing the disclosure of data cannot be obtained for a HCP, Sentinel CH. S.p.A. includes transfers of value relating to that HCP in an aggregate form.

The published data may be subject to updates during the publication period, resulting from the identification of errors or from the decision, by a Healthcare Professional involved, to modify the consent previously expressed.

Sentinel CH. SpA, in fact, in compliance with the provisions of the privacy legislation, if an involved party decides to revoke its consent after the date of publication, it will, following a written request, update the data published on its site accordingly, without prejudice to the commitment of Sentinel CH. S.p.A. to keep positive consensus rates as high as possible.

#### **7 - Retention of published data**

The Transparency Form will be made public for a period of at least three years from the date of its publication.

Sentinel CH. S.p.A. also keeps the documentation supporting the published data in electronic format for a period of at least five years and makes it available in detailed form at the request of the Professional / Healthcare Organization / Third Party.