

**Zimmer Biomet Italia s.r.l. Methodology Note on Disclosure of Transfers of Value with HCPs, HCOs and Third Parties in accordance with requirements of the Confindustria Dispositivi Medici Code****1. Introduction**

Zimmer Biomet Italia s.r.l. supports laws and regulations that promote transparency around relationships between industry, Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs) associated with transfers of value (ToVs) related to medical devices, through the Company's compliance with associated disclosure requirements.

In this regard, and as a member of Confindustria Dispositivi Medici, Zimmer Biomet Italia s.r.l. complies with obligations to collect, disclose and report ToVs related to HCPs, HCOs and other Third Parties in accordance with the Confindustria Dispositivi Medici Code of Ethics ("Code"). The Code regulates aspects of the industry's relationship with HCPs and HCOs, such as company-organized events, arrangements with consultants, research and financial support to medical education, amongst others.

This document summarizes the disclosure recognition methodology and practices taken by Zimmer Biomet Italia s.r.l. as part of its obligations under the Code.

**2. Disclosure Scope and Timelines**

Zimmer Biomet Italia s.r.l. discloses, on an individual or aggregate basis, the amounts paid to HCO, HCP and Third Party Recipients in each Reporting Period which can be reasonably allocated to one of the categories set out below. The categories for disclosure are as follows:

- Costs for participation in training, educational and promotional events;
- Financial support of events;
- Fees for consultancy activities and professional services;
- Donations in cash and cash equivalents to Third Parties, other than HCOs;
- Costs for research and development activities;
- Scholarships.

Zimmer Biomet Italia s.r.l. discloses in the Italy section of the Zimmer Biomet EMEA website annually by June 30<sup>th</sup> of each calendar year, for ToVs pertaining solely to Zimmer Biomet Italia s.r.l. in the previous calendar year. Some ToVs can originate from Zimmer GmbH but are nevertheless included for reporting purposes, in cases where the Recipient's activities are in the service or pertaining to the sole benefit of Zimmer Biomet Italia s.r.l. Excluded from this disclosure are ToVs for which the primary beneficiary and contractual party is Zimmer Biomet at regional or global level (ie where Zimmer Biomet Italia is not the exclusive or sole beneficiary).

### Adjustments to disclosures

Zimmer Biomet Italia s.r.l. discloses transfers of value based on the amount paid to the Recipient. In case of discrepancies between the actual payments and the disclosed amount, Zimmer Biomet Italia s.r.l. will initiate a correction of the published data. HCPs/HCOs/Third Parties may contact Zimmer Biomet Italia s.r.l. at any time to obtain information concerning their personal data and how it has been collected and processed. If any data appears to be incorrect, Zimmer Biomet Italia s.r.l. will evaluate such requests and take the necessary actions to ensure accuracy.

## **3. Acceptance and Personal Data Protection**

### Acceptance

Zimmer Biomet Italia s.r.l. informs HCPs about disclosure requirements through the inclusion of a clause relating to transparency within all Agreements. By entering into the Agreement, Recipient understands that Zimmer Biomet Italia s.r.l. may report information about the transfers of value provided under the Agreement as required by law or industry association rules. Consent is requested from HCPs prior to any individual disclosure of information.

### Personal Data Protection

For cases whereby any personal data must be disclosed, under the current Code or in the future, Zimmer Biomet implements required mechanisms to ensure that any processed or transferred Personal Data receive adequate levels of protection in accordance with applicable law.

## **4. Financial Aspects**

### Calculation rules

For the purposes of disclosure, Zimmer Biomet Italia s.r.l. discloses the amount as paid out (excluding VAT or other taxes/fees, unless otherwise unavoidable) for the year in which the transfer of value was made. All transfers of value are disclosed in Euros. In the event that the aggregate amount includes payments made in different currencies, disclosure of the aggregate amount remains in Euros. The exchange rate applied for currency conversion is an average of the disclosure year's rate.

### Multi-year agreements

For multi-year agreements, Zimmer Biomet discloses and recognizes the amount of funding relevant for the year in which the payment was made. This means that if for example a two-year Grant was provided to a Recipient based on payments spread over two separate reporting periods, the payments would be disclosed separately based on the time of each transaction.