

Florio Methodology Note

2024 Transfers of Value (reported 2025)

Introduction

Transparency is fundamental to ensure a positive working relationship between the medical technology industry and healthcare professionals. Florio GmbH is committed to meet transparency requirements, including the MedTech Europe Code of Ethical Business Practice (Code). The Code places a requirement on MedTech companies to publicly report all payments (transfers of value or ToV) related to Educational Grants made to Healthcare Organisations (HCO) registered in Europe.

Florio GmbH follows the Code instructions for disclosing ToVs provided in the local industry codes. According to the instruction such a note shall be published together with the annual report of transfers of value. The information in the methodology note corresponds to instructions provided to Florio employees involved in the collection and reporting of transfers of value.

Methodology

General

What is included in the annual ToV report?

Florio GmbH discloses educational grants paid to Healthcare Organisations in Europe on an aggregated basis, for each clearly identifiable and separate recipient in each reporting period.

Educational Grants include:

- Educational Grants to support Third Party Organised Events
- Other Educational Grants to Healthcare Organisation

Which ToVs are not included in the Florio report?

Florio has decided to comply with the instructions provided by the MedTech Europe. ToVs to recipients other than those mentioned in these instructions will not be reported in this report.

Who is the recipient of the ToV?

Florio considers the recipient to be the contracting Healthcare Organisation.

Reporting Period

Disclosures shall be made on an annual basis and each Reporting Period shall cover a full calendar year.

Time of Disclosure

Disclosures shall be made by each Member Company within 6 months after the end of the relevant Reporting Period.

Time of Publication

The disclosure shall be made public at the time of publication. The time of publication is the 31st August of the year of the relevant time of disclosure.

Where is ToV disclosed?

Florio will publish the annual ToV Report on Florio's external webpage (www.florio.com). In cases where countries require additional disclosure in local registries, Florio will in addition disclose ToVs in accordance with local reporting regulations.

Is Florio MedTech Europe Member?

No, Florio is not a member of MedTech Europe, however, Florio has voluntarily committed to follow the MedTech Europe Code and its disclosure regulations.

Which currency is used?

Transfers of values are initially registered in the currency paid by Florio.

Is value added tax (VAT) included in the reported amounts?

The reported amounts do not include VAT, even in those cases when VAT has been paid.

Recipients

Are payments made from Florio to HCOs through CRO's included in the Florio report?

Yes, all direct and indirect ToVs to HCOs are included in the Florio report.

The report template

What is disclosed under "HCO"?

HCO is an abbreviation for Health Care Organisations and include organisations which organises/include HCPs. An HCO is always a legal entity.

Contact information

Inquiries about Florio's disclosure of ToVs to HCOs, such as additional information or corrections should be directed to: E-mail: info@florio.com

Retention and Modification of the Disclosures

Florio shall be able to modify, delete or in any way alter their disclosures at any time before or after the time of publication.

The information disclosed shall remain in the public domain for 3 years after the time such information is first published.