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**SUBJECT: TRANSPARENCY OBLIGATIONS 2021 CODE OF ETHICS CDM - NOTE SUMMARIZING THE METHODOLOGY USED FOR THE PREPARATION OF DATA**

With regard to the principle of calculation and consequent exposure of data, ELITechGroup SpA has decided to use the cash principle.

Therefore, only the amounts paid within the period under analysis are shown in the report.

This criterion is adopted both in the case of direct payment to the HCP and HCO, and in the case of indirect payment to agencies or similar bodies.

In the case of studies that have multiple payment tranches, the publication only takes into account the tranches paid during the year.

All the amounts indicated are in euros and are shown net of VAT.