

# Lupin Healthcare (UK) Ltd

## Methodological note for HCP/ORDM/HCO disclosure 2025

Data year: 2025

Year of publication: 2026

Lupin Healthcare (UK) Ltd (“Lupin”) is committed to working in an open and transparent way, both with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), to better serve the needs of patients. We are working in collaboration with the Association of the British Pharmaceutical Industry (ABPI) in order to ensure we continue to set high standards of ethical interaction between Lupin Healthcare (UK) Ltd and HCPs/HCOs within the UK. This document outlines the methodology and definitions used by Lupin in relation to such disclosure.

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# 1 Definitions

## 1.1 Recipients

Health care professionals, other relevant decision-makers and health care organisations

## 1.2 Kind of ToVs

Donations, grants, contributions to costs of events, contracted service fees and expenses, R&D

# 2 Disclosure's Scope

## 2.1 Products concerned

Prescription-only medicines

## 2.2 Company concerned

Lupin Healthcare (UK) Ltd. And Renascience Pharma from 2025

## 2.3 Excluded ToVs

The following are not included as transfers of value for the purposes of the ABPI Code:

- Ordinary course purchases and sales of medicines by and between the company and a health professional or a healthcare organisation
- samples of medicines provided in accordance with Clause 21 of the ABPI Code of Practice (2024)
- transfers of value provided in accordance with Clauses 10.5, 10.6 and 19.2

- subsistence provided to health professionals and other relevant decision makers in accordance with Clause 10.1.
- Donations to charitable organisations, Patient Organisations and other organisations.

#### **2.4 ToVs date**

1<sup>st</sup> January 2025 – 31<sup>st</sup> December 2025

#### **2.5 Direct ToVs**

Fee for service for consultancy and speaking services; expenses; travel and accommodation; donations and grants to HCOs; sponsorship for HCOs

#### **2.6 Indirect ToVs**

Support for events given via a 3<sup>rd</sup> party; Fee for service for consultancy and speaking services where the HCP service fee must be paid to the HCO

#### **2.7 Non-monetary ToVs**

Not applicable

#### **2.8 ToVs in case of partial attendances or cancellation and refund**

If an HCP/HCO does not receive funding/benefit for any reason, (for example: • Due to a cancellation of event • HCP has decided not to attend an event or a course • Has not provided bank details for payment • HCP did not want a fee) then the associated costs are not reported against the HCP/HCO. Only the actual attributed benefits to HCPs/HCO are reported

#### **2.9 Cross-border activities**

Transfers of value include payments made from global Lupin teams to UK HCPs or UK HCOs. These do not include exchange transactions. Details of support given to UK HCPs/HCOs and ORDMs have been reported to the UK company and fully disclosed. All payments to HCPs and HCOs were made in sterling (£).

#### **2.10 R&D**

Two studies have involved payments to HCPs/HCOs and the total sum is disclosed

#### **2.11 Voluntary disclosure**

Not applicable

### **3 Specific considerations**

#### **3.1 Country unique identifier**

[No unique identifiers have been used]

### **3.2 Self-incorporated HCP**

If one health professional or other relevant decision maker works via a limited company of which they are the only HCP or ORDM employed, then payments to that company have been disclosed as paid to the individual concerned.

### **3.3 Multi-year agreements**

Not applicable; the company has not entered into any relevant multi-year agreements covering the reporting period

### **3.4 Country specificities**

Not applicable

### **3.5 Quality Checks**

Data quality checks are performed prior to reporting

## **4 Data protection legal basis**

### **4.1 Consent collection**

Legitimate interest

### **4.2 Legitimate interests**

Disclosure of Lupin TOVs to the ABPI is made on the basis of company “legitimate interests”. All consultancy agreements between Lupin Healthcare (UK) Ltd and HCPs/HCOs state that Lupin will disclose Transfer of Value information on the basis of Lupin’s legitimate interests. HCPs/HCOs must read this clause within the consultancy agreement and sign an acknowledgement. The consultancy agreement sets out the relevant provisions of the Data Protection Act for HCPs and provides an email address should the HCP object to such disclosure. Furthermore, the HCP is reminded that s/he can ask Lupin not to include his/her personal data in connection with the disclosure of the TOV.

Data quality checks are performed prior to reporting. Data are then extracted to populate the template provided by the Prescription Medicines Code of Practice Authority (PMCPA) which administers the Association of the British Pharmaceutical Industry's (ABPI) Code of Practice. TOVs are disclosed on an individual basis unless the HCP has objected. If an HCP has asked for their personal data not to be disclosed, the amounts attributable to such transfers are disclosed on an aggregate basis. The number of recipients involved are stated, together with the percentage of all recipients that they represent and the aggregate amount attributable to TOVs to such recipients .

An email address is included in Lupin’s consultancy agreements to answer any transfer of value queries. Following publication, HCPs and HCOs can contact Lupin or the ABPI for clarifications or to ask that their data is not disclosed. In this case, Lupin will adjust its disclosure to ensure that the total amount of transfer of values attributed to that HCP is included as the part of the disclosed aggregate amount and no longer disclosed against the individual HCP. The UK disclosure data is hosted on the ABPI central platform so

HCPs/ORDMs or HCOs will initially raise queries or requests with the independent ABPI data partner. If a query is not resolved in 14 days, the ABPI data partner will move the queried amount into the aggregate section of the disclosure data until the query is resolved.

## **5 Form of disclosure**

### **5.1 Date of publication**

June 2026

### **5.2 Disclosure platform**

Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### **5.3 Disclosure language**

English

## **6 Disclosure financial data**

### **6.1 Currency**

GBP.

### **6.2 VAT included or excluded**

All amounts shown are exclusive of VAT.

### **6.3 Calculation rules**

Not applicable

## **7 Additional Information**