

Statement - Annual Disclosure under ABPI Code, of Payments made by Luye in the Year 2024

March 24, 2025

Luye Pharma Ltd is committed to transparency in our interactions with Healthcare Professionals (HCPs), with the Healthcare Organisations (HCOs) and Other Relevant Decision Makers (ORDMs), in the United Kingdom.

Luye Pharma Ltd is committed in ensuring transparency of relationships with Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and other relevant decision makers (ORDMs) by operating within the Association of British Pharmaceutical Industry (ABPI) Code of Practice for the Pharmaceutical Industry with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on Disclosure on Transfers of Value.

As part of our commitment to transparency and openness about our activities and to meet the requirements of the Association of the British Pharmaceutical Industry (ABPI) Code of Practice, we **Luye Pharma Ltd** have disclosed all payments of value to members of the Public including to patients and journalists on our company website. Payments or benefits received by HCPs, HCOs, and ORDMs during the 2024 calendar year will be disclosed on a central platform managed by the ABPI and made public in 2025. These payments or benefits to the best of our knowledge are published on the relevant gateway on the ABPI platform and a link to the web page may be accessed here; <https://www.abpi.org.uk/reputation/disclosure-uk/>

Luye Pharma Ltd may interact with members of the public for services which may include speaking at meetings, assistance with training, writing articles and/or publications, participating in advisory boards, advising on the design etc of clinical trials and participating in market research where such participation involves remuneration and/or travel. Prior to making any agreements with the members of the public, **Luye Pharma Ltd** reviews the compliance risks from any engagements. The legal and compliance team at **Luye Pharma Ltd**, approves the fair market value to be paid for such engagements and the payment is made based on contracts executed between parties. The written contract specifies the nature of the services to be provided and the payment for those services and, where possible, a breakdown of agreed costs. We apply the on boarding process to assess, screen, validate, manage, and monitor any interactions to ensure that our internal compliance requirements are met. The value of any transfers made is in GBP Stirling (£). Where the payment has been provided by **Luye Pharma Ltd** or a third-party from outside the UK such payments are provided in the local currency and converted to GBP Stirling (£) using the spot rate during the month of engagement. All payments were reconciled against the contractual agreements, the tracker recordings and the actual payments made.

Donations and Grants to HCOs that support healthcare, including donations and grants to institutions, organisations or associations that are comprised of HCPs and/or that

provide healthcare. For financial grants the date of the payment has been recorded as the date the payment was processed by **Luye Pharma Ltd**.

Luye Pharma Ltd does not disclose payments for any medicines provided on request to HCPs for individual patients which come under 'Compassionate Use Supply'. Payments made to homecare providers, which **Luye Pharma Ltd** uses for the delivery of homecare services nationally, have not been included herein for disclosure. Such payments are treated as a fee for service to the vendors who do not fall into the category of HCPs or HCOs and for this reason, we have taken the view that such payments fall outside the scope for disclosure.

In accordance with the ABPI Code of Practice, to the best of our knowledge we annually disclose all transfers of value made to these individuals and organizations.

Our disclosure includes:

Payments and benefits in kind to HCPs and ORDMs, such as:

- Fees for services and consultancy
- Sponsorship for attendance at meetings
- Travel and accommodation expenses
- Joint working initiatives

Transfers of value to HCOs, including:

- Donations and grants
- Sponsorship of events/meetings
- Fees for services and consultancy
- Research and development transfers of value

This document summarises the approach taken by **Luye Pharma Ltd** in calculating the figures provided and considers:

[1] ABPI Code of Practice for the Pharmaceutical Industry 2021. Available from:

<https://www.abpi.org.uk/reputation/disclosure-uk/>

[2] EFPIA Code of practice 2024. Available from: [https://www.efpia.eu/relationships-](https://www.efpia.eu/relationships-code/the-efpia-code/)

[code/the-efpia-code/](https://www.efpia.eu/relationships-code/the-efpia-code/)

[3] PMCPA Disclosure-Methodological Notes points for consideration. Available from:

<https://www.pmcpa.org.uk/guidance-and-qas/guidance/disclosure-methodological-note-for-annual-disclosure-of-transfers-of-value-to-health-professionals-other-relevant-decision-makers-and-healthcare-organisations/>

Legitimate Interest as the Lawful basis for Processing - In the spirit of achieving greater transparency, **Luye Pharma Ltd** has adopted legitimate Interest as the lawful basis for processing data for disclosure purposes.