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# Luye Pharma Ltd: Methodological note for HCP/ORDM/HCO disclosure [2025]

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# 1 Definitions

## 1.1 Recipients

[Recipients include Healthcare Professionals (HCPs), Healthcare Organisations (HCOs), and Other Relevant Decision Makers (ORDMs) in the United Kingdom. Luye Pharma Ltd interacts with these groups for activities such as speaking engagements, advisory boards, training, publications, and consultancy services.]

## 1.2 Kind of ToVs

[Transfers of Value (ToVs) include:

Fees for service, consultancy, and other contracted services.

Sponsorship for attendance at scientific or educational meetings.

Travel and accommodation.

Donations, grants, and research-related transfers.

Our disclosure includes: Payments and benefits in kind to HCPs and ORDMs, Transfers of value to HCOs, including: Donations and grants.]

# 2 Disclosure's Scope

## 2.1 Products concerned

All Luye Pharma Ltd medicinal products marketed or supported in the UK are included. ToVs are disclosed irrespective of product or therapeutic]

## 2.2 Company concerned

[This methodological note applies to Luye Pharma Ltd, including ToVs made directly or via third-party vendors acting on behalf of the company.]

### **2.3 Excluded ToVs**

[Luye Pharma Ltd does not disclose payments for any medicines provided on request. (e.g., sample medicines or compassionate-use/early-access products where no commercial consideration is passed). Payments made to homecare providers fall outside the scope for disclosure.]

### **2.4 ToVs date**

[The date recorded is the date the payment was processed by Luye Pharma Ltd. For financial grants the date of the payment has been recorded as the date the payment was processed]

### **2.5 Direct ToVs**

[Direct ToVs include payments made directly by Luye Pharma Ltd to HCPs, HCOs, or ORDMs for contracted services or sponsorship]

### **2.6 Indirect ToVs**

[Where the payment has been provided by **Luye Pharma Ltd** or a third-party from outside the UK, the ToV is recorded in the local currency and converted to GBP Sterling (£) using the spot rate during the month of engagement. All payments are reconciled against the contractual agreements, the tracker recordings and the actual payments made.]

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

[Non-monetary ToVs include benefits in kind such as travel, accommodation, and meeting sponsorship, valued at fair market value.]

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

Where an HCP, HCO, or ORDM partially attends the involved event, the ToV is recorded at the pro-rata value of the services delivered.

In the case of cancellation or refund, any ToV already disclosed is adjusted in the subsequent publication cycle to reflect the net amount actually retained.

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

[For cross-border activities involving HCPs, HCOs, or ORDMs outside the UK, ToVs are disclosed in the jurisdiction where the principal engagement takes place, in line with the applicable national code. In the UK, only ToVs related to UK-based recipients or UK-based activities are disclosed through the UK ToV platform.

### **2.10 R&D**

ToVs related to research and development (R&D) activities (e.g., grants, investigator-initiated research, clinical trials) are included in the disclosure if they constitute a transfer of value to HCPs, HCOs, or ORDMs. Such payments are reported at the net value after deduction of VAT where applicable, in line with ABPI/EFPIDom guidance.

### **2.11 Voluntary disclosure**

[Luye Pharma Ltd voluntarily discloses payments to members of the public (patients, journalists) on its company website.

“We Luye Pharma Ltd have disclosed all payments of value to members of the Public including to patients and journalists on our company website”.]

## **3 Specific considerations**

### **3.1 Country unique identifier**

Each disclosed record is assigned a country-specific unique identifier in line with the ABPI platform requirements.

This identifier links the ToV to the relevant HCP, HCO, or ORDM within the UK ToV reporting system.

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

Where an HCP operates through a self-incorporated practice or company, the ToV is disclosed under the name of the individual HCP, and the legal entity (if relevant) is indicated in the platform where possible, consistent with the ABPI template.

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

For multi-year agreements, each payment is disclosed in the calendar year it is processed, rather than attributing the entire contract value to the first year.

The disclosure clearly reflects the annual payment amounts rather than the total contract value.

### **3.4 Country specificities**

[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 2025 calendar year will be disclosed on a central platform managed by the ABPI and made public in 2026]

### **3.5 Quality Checks**

Luye Pharma Ltd performs regular quality checks on ToV data, including:

- Reconciliation between contracts, attendance records, and payment ledgers.
- Validation of beneficiary details (HCP, HCO, or ORDM classification).
- Spot checks and internal audit reviews to ensure completeness and accuracy prior to publication.

## 4 Data protection legal basis

### 4.1 Consent collection

[Where required, by data protection law, explicit consent is collected from HCP's, HCO's, ORDM's and other recipients prior to the disclosure, in line with ABPI and EFPIA guidance.]

### 4.2 Legitimate interests

[Luye Pharma Ltd has adopted legitimate Interest as the lawful basis for processing data for disclosure purposes subject to an appropriate balancing test and privacy-impact assessment.]

## 5 Form of disclosure

### 5.1 Date of publication

[Disclosures for the 2025 data year will be published in 2026]

### 5.2 Disclosure platform

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 2025 calendar year will be disclosed on a central platform managed by the ABPI and made public in 2026]

### 5.3 Disclosure language

[English]

## 6 Disclosure financial data

### 6.1 Currency

GBP £]

### 6.2 VAT included or excluded

[VAT treatment follows ABPI guidance; typically, VAT is excluded unless otherwise required.]

### 6.3 Calculation rules

[ToV's in foreign currencies are converted to GBP using the spot rate during the month of engagement.]

“All payments were reconciled against the contractual agreements, internal trackers, and actual payment records to ensure accuracy detail]

## **7 Additional Information**

[Luye Pharma Ltd operates a compliance and onboarding process to assess, screen, validate, and monitor all interactions with HCPs, HCOs, ORDMs, and members of the public] All such interactions are conducted in accordance with applicable laws, industry codes, and internal policies on transparency and integrity.