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Eli Lilly and Company Ltd

Methodological note for HCP/ORDM/HCO disclosure 2025

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This note describes the methods used by Eli Lilly and Company Limited (“Lilly”) in the UK to meet its obligations and the requirements for disclosing payments and Transfers of Value (ToV) to Health Professionals (HCPs) and Healthcare Organisations (HCOs) as outlined in the EFPIA Disclosure Code and reflected in the ABPI Code of Practice for the Pharmaceutical Industry.

This note excludes the requirements relating to Patient Organisations, as the reporting obligations for Patient Organisations are fulfilled as published on [lillypad.eu](https://www.lilly.com/uk/policies-reports/transparency-disclosures). Disclosures for members of the public, including journalists and patients, are published on the Company website at <https://www.lilly.com/uk/policies-reports/transparency-disclosures>.

Contents

1	Definitions	2
1.1	Recipients	2
1.2	Kind of ToVs	2
2	Disclosure’s Scope	3
2.1	Products concerned	3
2.2	Company concerned	3
2.3	Excluded ToVs	3
2.4	ToVs date	3
2.5	Direct ToVs	3
2.6	Indirect ToVs	3
2.7	Non-monetary ToVs	4
2.8	ToVs in case of partial attendances or cancellation and refund	4
2.9	Cross-border activities	4

2.10	R&D	4
2.11	Voluntary disclosure	4
3	Specific considerations	4
3.1	Country unique identifier	4
3.2	Self-incorporated HCP	4
3.3	Multi-year agreements	4
3.4	Country specificities	5
3.5	Quality Checks	5
4	Data protection legal basis	5
4.1	Consent collection	5
4.2	Legitimate interests	5
5	Form of disclosure	6
5.1	Date of publication	6
5.2	Disclosure platform	6
5.3	Disclosure language	6
6	Disclosure financial data	6
6.1	Currency	6
6.2	VAT included or excluded	6
6.3	Calculation rules	6
7	Additional Information	6

1 Definitions

1.1 Recipients

With respect to **HCP/HCO Definitions**, the ABPI definitions are followed, and any ToV provided to HCPs/HCOs are reported within the relevant categories. As per the ABPI guidance, other relevant decision makers are included in the UK Report in the HCP disclosures. If an HCP is retired and they had a licence to practice at the time of payment, payments are disclosed as for other HCPs. Payments to deceased HCPs are included as the data is based on the payments made and/or support given at the time of provision.

For the avoidance of doubt, organisations providing education to healthcare professionals are included as HCOs.

1.2 Kind of ToVs

The data includes the categories as defined in the ABPI code for:

- Collaborative Working, including Joint Working: refer to Section 8 for additional information
- Donations and Grants to HCOs
- Contribution to Costs of Events, including
 - Sponsorships (including Corporate Memberships) to HCOs
 - Support for HCPs, including registration fees, travel and accommodation
- Fees for Contracted Services and related expenses
- Package Deals that do not relate to ordinary course purchases and sales of medicines

- Where items or services are part of a Patient Support Program, these are reported as fees for contracted services with the Third party provider.

2 Disclosure's Scope

2.1 Products concerned

All Prescription Only Medicines with an Eli Lilly and Company marketing authorisation during the reporting period.

2.2 Company concerned

Eli Lilly and Company Ltd, including transactions originated by the parent company Eli Lilly and Company and any wholly-owned subsidiaries.

2.3 Excluded ToVs

The following data are excluded:

- Donations funded by employee contributions (Company gift-matching is reported)
- Transfers of Value (ToV) for food and drink within Code limits
- Payments to organisations that provide services related to clinical trials but do not otherwise meet the definition of a Healthcare Organisation (HCO)
- Payments to retired Healthcare Professionals (HCPs) without a licence to practice – they are considered members of the public (MoP) and included in the MoP disclosure on the Company website

2.4 ToVs date

All payments leaving Company accounts in 2025, or benefit-in-kind calculated for projects concluded in 2025.

2.5 Direct ToVs

Payments made or benefit-in-kind given directly to the end recipient as per section 1.2.

2.6 Indirect ToVs

Payments or benefits-in-kind to the end recipient via a third party, where the end recipient is known to the Company. Where payment is made to third parties organising events on behalf of a single HCO, these are recorded as a ToV to the HCO beneficiary. In the event that several HCOs benefit, payment is disclosed against the third party (sometimes known as a Professional Conference Organiser (PCO)). Where an HCP payment is made to an HCO with more than one director, the payment is disclosed against the HCO. Where fees for service are paid to an HCO, but there is an expense attributable to an individual, such as accommodation or travel, the ToV is reported for the individual.

2.7 Non-monetary ToVs

Benefit-in-kind may include goods or services, including employee or contractor time, and is calculated as set out in the relevant agreement for the activity concerned.

2.8 ToVs in case of partial attendances or cancellation and refund

Partial attendance is reported as ToV, but cancellation where registration, accommodation, or travel was not used, is not reported.

2.9 Cross-border activities

Payments and benefit-in-kind to UK HCPs and UK HCOs are included in the UK report regardless of the country of origin of the payment.

2.10 R&D

This disclosure includes Transfers of Value to HCPs or HCOs related to the planning or conduct of:

- non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); or,
- clinical trials (as defined in Directive 2001/20/EC); or,
- non-interventional studies that are prospective in nature and that involve the collection of patient data from, or on behalf, of individual or groups of HCPs specifically for the study.

The disclosure includes both Lilly and Contract Research Organisation managed studies. All fees for service, including clinical grants, are reported as aggregate R&D ToV. Travel, accommodation, and expenses related to R&D activities are reported as ToV to the individual concerned as expenses related to contracted services.

2.11 Voluntary disclosure

The report does not include disclosures beyond the categories in section 1.2.

3 Specific considerations

3.1 Country unique identifier

Customer Identification numbers for HCPs and HCOs are provided and validated by a standard commercial supplier.

3.2 Self-incorporated HCP

Where an HCP is contracted through a company in which they have the sole interest, the ToV is reported for the HCP.

3.3 Multi-year agreements

ToV is disclosed based on the date the payment was made from the Company, the parent Company, or the wholly-owned subsidiary.

3.4 Country specificities

When working with other pharmaceutical companies, such as in joint ventures or by co-promotion, Lilly will disclose ToV in this UK Report when Lilly is the contracting party and has made the ToV to the HCP/HCO.

For Collaborative Working and Joint Working, links to the executive summary are included in the data uploaded to Disclosure UK. Where projects are completed, the link to the summaries is given as <https://www.lilly.com/uk/who-we-are/partnerships-UK> as the executive summary has been retired. Benefit-in-kind ToV is calculated at project closure and reported after project completion.

3.5 Quality Checks

Data is checked at source prior to collation for reporting. Due to the high volume of transactions, a sample of the data is checked at upload, including the ten highest value transactions for HCOs and HCPs.

4 Data protection legal basis

4.1 Consent collection

Not applicable, refer to section 4.2.

4.2 Legitimate interests

Transfers of Value to the HCPs from 1st January 2024 are disclosed on an individual level, detailed in contracts and registration documentation, based on the following legitimate interests of Lilly and ABPI:

- Lilly and ABPI's interest in using information about the transfers of value that an HCP received from us so that Lilly can comply with our obligations under the Code;
- Public interest in better understanding the financial relationships that covered individuals may have with the pharmaceutical industry in the interests of transparency and trust in the pharmaceutical industry;
- ABPI's legitimate interest in receiving the data for publication, to help meet the overall objectives of the Code, including transparency.

HCPs have certain rights under the data protection laws and can object to the publication of ToV data under their name on the disclosure database. If an HCP wishes to raise an objection, they can email datarights@lilly.com. HCP objections that are upheld are applied to all payments and/or support for the individual. ToV for HCPs with upheld objections is included in the aggregate HCP data.

The UK report may be updated by Lilly to reflect changes in the cases where objection is accepted and in correction of data at any time.

5 Form of disclosure

5.1 Date of publication

30/06/26

5.2 Disclosure platform

www.disclosureuk.org.uk

5.3 Disclosure language

English

6 Disclosure financial data

6.1 Currency

Great British Pounds (GBP). If a payment was not made in GBP, conversion rates are used that are based on Lilly's financial rates at that time.

6.2 VAT included or excluded

VAT is excluded (when administratively feasible) from the values reported.

6.3 Calculation rules

Support of Individuals:

- Registration Fees for Lilly Sponsored HCPs are disclosed in the HCP section of the UK Report. ToV is equal to the average amount of registration fees purchased by Lilly for HCP meeting attendees.
- Travel includes actual amounts for flights, rail and private transport; and average amounts for group transports, including expenses reimbursed that relate to travel.
- Accommodation ToV is equal to the average room rate for hotel rooms purchased by Lilly for HCP meeting attendees.

Where £0 values are reported, this is due to rounding down. These line items represent transactions valued at £0.49 or less.

7 Additional Information