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# **Lundbeck UK Ltd Methodological Note**

Supporting the implementation of the ABPI Code of Practice Disclosure of Transfers of Value to Healthcare Professionals, Other relevant Decision Makers and Healthcare Organisations

### **Preamble**

As an innovative and responsible pharmaceutical company, specialising in supporting the lives of patients living with psychiatric and neurological disorders, Lundbeck works with healthcare professionals and other relevant decision makers, such as researchers (HCPs, ORDMs) and healthcare organisations (HCOs), such as hospitals, clinical practices and universities, to develop and deliver treatment options to people living with psychiatric and neurological diseases.

We are committed to keep our collaborative working professional, free of undue influence and always transparent. Therefore, we contribute to, and follow, applicable European and country industry codes that promote increased transparency.

Lundbeck works with HCPs and HCOs throughout the pharmaceutical value chain, from early discovery, research activities and clinical studies of medicines under development, through to sales and marketing activities once a medicine has a Marketing Authorisation and is available for patients.

### **About this document**

This Methodological Note will provide you with relevant details about how we support an open and transparent relationship between ourselves, HCPs, ORDMs and HCOs. For further information on our transparency commitments please see information at the following link:

<https://www.lundbeck.com/global/sustainability/transparent-interactions>

The disclosure of transfers of value (ToVs) in the UK is in full accordance with the current ABPI Code of Practice: <https://www.pmcpa.org.uk/the-code/2021-interactive-abpi-code-of-practice>

### **Consent to Disclose**

HCPs and ORDMs are asked to give their consent so that Lundbeck can disclose the information about our ToVs. The HCPs are protected by European and UK data protection regulations and if consent is not given Lundbeck will report their ToVs in an aggregated sum.

Lundbeck makes all reasonable efforts at global and national level to obtain the highest level of consent to disclose ToVs from HCPs/ORDMs to achieve the objectives of transparency under the ABPI Code of Practice.

For 2021 activities Lundbeck had interactions with a total of 52 HCPs/ORDMs, of which 35 provided consent for individual disclosure, representing an overall disclosure rate of 67% and non-disclosure rate of 33%.

### Calculation rules

Lundbeck adheres to the general principle of “following the money”. This means that the actual date when a ToV is made is used for disclosures.

Examples:

- Payments for services are usually tracked up to 60 days after the services have taken place
- Travel and accommodation are tracked on the day the flight departed/arrived or the meeting took place - meaning the day the recipient became a beneficiary
- Travel/accommodation or meeting registration fees supported by Lundbeck are disclosed regardless of whether the HCP/ORDM attended the meeting.

### Consent collection and withdrawals

Consent to disclose ToVs for individual HCPs/ORDMs is managed annually.

Lundbeck adheres to all applicable data protection regulations and if a HCP/ORDM withdraws their consent, any ToVs would then be aggregated and Lundbeck will adjust its disclosures accordingly within a reasonable time. Withdrawal of consent is considered to apply retrospectively to ToVs made prior to withdrawal of consent within the calendar year, and prospectively to future ToVs. Lundbeck always works to ensure that consent rates are as high as possible.

### Country unique identifier

Lundbeck uses OneKey numbers to identify individual HCPs, ORDMs and HCOs, if available. Otherwise, HCPs/ORDMs and HCOs are identifiable by their names and addresses.

### Cross-border activities

Globally, Lundbeck has implemented processes and procedures to ensure that all activities are managed compliantly and in accordance with any global and local regulations. Cross-border activities where other Lundbeck entities have engaged a UK HCP/ORDM or HCO are included in the UK disclosures.

### Currency

Disclosures of ToVs for HCPs, ORDMs and HCOs based in the UK are made in Pound Sterling (GBP). If a stakeholder is contracted through another Lundbeck entity, they might receive payments in another currency. Currency conversion is managed within Lundbeck’s systems to ensure appropriate and accurate conversions globally, with Euros and Danish Kroner as standard company rates of reference.

### Data Protection and Privacy

Lundbeck Ltd is firmly committed to protecting the privacy of any personal information collected. Details of how we will use and protect that information are available in our privacy policy which is on our website at: <https://www.lundbeck.com/global/privacy-policy>

### Definitions

#### HEALTHCARE PROFESSIONAL (HCP)

- Lundbeck Ltd has adopted the definition as per the ABPI Code of Practice i.e. any member of the medical, dental, pharmacy or nursing profession and any other person who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine.

#### HEALTHCARE ORGANISATION (HCO)

- Lundbeck Ltd has adopted the definition as per the ABPI Code of Practice, i.e either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in the U.K. or an organisation through which more than one health professionals or other relevant decision makers provide services.

#### OTHER RELEVANT DECISION MAKER (ORDM)

- Lundbeck Ltd has adopted the definition as per the ABPI Code of Practice and includes those with an NHS role who could influence way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who is not a health professional.

### Direct and indirect Transfers of Value

Direct ToVs are those made directly from Lundbeck to a HCP, ORDM or HCO.

Examples are, a payment transferred to a CP's, ORDM's or HCO's bank account, or transportation that Lundbeck has booked and provided as part of collaborations.

Indirect ToVs are those made through a third party to a HCP, ORDM or HCO.

Examples include an agency working on Lundbeck's behalf booking transportation for HCPs, or an HCP/ORDM working through a limited company.

Both direct and indirect ToVs are disclosed according to the ABPI Code of Practice. For HCPs or ORDMs working for a limited company, the ToV is disclosed against the individual. Should an HCP/ORDM working through a limited company withdraw consent to disclose, then the ToVs are declared as aggregate.

### Identifiability of HCPs, ORDMs and HCOs

Lundbeck track and disclose all activities where the HCP/ORDM or HCO can be identified by Lundbeck. For most of Lundbeck's activities this is the case.

For Market Research projects the identity of HCPs, ORDMs or HCOs may not be known to

Lundbeck and no tracking or disclosures are made.

### **Management of requests from HCPs, ORDMs and other stakeholders**

Any HCP, ORDM or HCO that has worked with Lundbeck or participated in a Lundbeck organised or sponsored event, can at any time reach out to Lundbeck to request the information that is held on them, and receive this information in accordance with European and UK data protection regulations.

### **Multi-year engagements or activities**

Some engagements last more than a year, and payments are made as the activity progresses. The ToVs are recorded in the year they are provided and disclosed accordingly.

### **Partial attendance or cancellation of events**

Lundbeck works with HCPs, ORDMs and HCOs to always make sure that any interaction is planned and managed compliantly according to global and UK regulations. On rare occasions, a planned ToV will not be provided. On these occasions, Lundbeck will disclose only the actual tangible ToV and not those that are cancelled. Lundbeck will disclose ToVs in situations where a HCP cancels planned activities without notice, and a ToV has already occurred either directly or indirectly, for example non-attendance at a meeting where registration/travel has already been paid.

### **Patient Organisations**

In accordance with the ABPI code of Practice, disclosure of any payments to Patient Organisations are published separately on the Lundbeck UK website, at the following link: Lundbeck UK <https://www.lundbeck.com/uk/Sustainability/Transparent-interactions>

### **Partial consent**

In accordance with the ABPI Code of Practice, if consent to disclose is partially withdrawn, all ToVs to that individual for that given year will be disclosed on an aggregate basis.

### **Partners and Third Parties**

Lundbeck has commercial agreements with other pharmaceutical companies. All ToVs made in association with these commercial agreements are disclosed by Lundbeck if the HCP, ORDM or HCO has a contractual relationship with Lundbeck and receives the ToV directly from Lundbeck.

### **Retired HCPs**

In cases where disclosures are made against any retired HCPs, the institution field in the disclosure is denoted as N/A, but full address details are provided.

### **Research and Development disclosures**

Lundbeck adheres to the definition of Research and Development ToVs as defined by the ABPI Code of Practice. All ToVs related payments to HCPs or HCOs concerned with the planning and conduct of clinical studies in the UK are excluded from the individual disclosures and are provided as a total aggregate value for the year. This figure includes any payments made by Lundbeck UK or on/on behalf of H Lundbeck.

### **Retention of Data**

Published data is retained for 5 years. Lundbeck will store the data securely for this period of time, after which it will be appropriately deleted or anonymized.

### **Value Added Tax (VAT)**

ToVs include VAT if applicable.

### **Further Information**

For further information, please contact Lundbeck UK at [united\\_kingdom@lundbeck.com](mailto:united_kingdom@lundbeck.com)