

Lundbeck Ltd (UK) Methodological Note for disclosures made for the year 2024.

Supporting the requirement of the ABPI Code of Practice on Disclosure of Transfers of Value (ToV) to Healthcare Professionals, Other relevant Decision Makers, and Healthcare Organisations.

Preamble

As an innovative and responsible pharmaceutical company with more than 70 years of expertise in the development and commercialization of medicines in neuroscience, and 43 years in the United Kingdom (UK), Lundbeck innovates, collaborates and partners with individual healthcare professionals (HCPs), other relevant decision makers (ORDMs), healthcare organisations (HCOs) and institutions such as universities.

These partnerships focus on research and development to deliver treatment options for people living with neurological diseases, including mental health conditions.

We are committed to maintaining professional and transparent relationships with these individuals and organisations. Therefore, we adhere to the requirements of both the European Federation of Pharmaceutical Industry Associations (EFPIA) and the Association of the British Pharmaceutical Industry (The Code) Codes of Practice.

Lundbeck collaborates with HCPs, ORDMs, and HCOs throughout the lifespan of a molecule—from discovery and clinical trials of potential medicines to sales and marketing activities once medicines receive marketing authorization in the UK.

This Methodological Note provides relevant details on how Lundbeck supports 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/uk/Sustainability/Transparent-interactions> The disclosure of ToV in the UK is in full accordance with the current 2024 ABPI Code of Practice which can be found via this link [2024-abpi-code.pdf](#).

Reporting Period

The Lundbeck Ltd 2024 ToV data is for payments made during the period 1 January 2024 to 31 December 2024 inclusive.

Transactions for activities during this period but made after 31 December 2024 will be included in the next disclosure.

Consent Management

HCP/ORDM Consent and Disclosure

HCPs/ORDMs engaged by Lundbeck with their principal place of practice based in the UK have received correspondence and agreements for consent to publish data through individual disclosure. Where an individual has not provided consent their data will be published in the aggregate data section of the disclosure, thereby ensuring Lundbeck Ltd processes personal data as required by the Data Protection Act of 2018 and the UK implementation of the General Data Protection Regulation (GDPR).

Further information on how Lundbeck processes personal data can be found [here](#).

Partial consent

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

- Consent to disclose ToVs for individual HCPs/ORDMs is managed annually; however HCPs/ORDMs may choose to remove that consent at any time in line with GDPR.
- Where consent is withdrawn by an individual the amount disclosed against that person will be

aggregated for that year and any other year they request.

- Consent is based on an all-in or all out basis, meaning HCPs/ORDMs cannot choose to declare only certain payments made to them.

HCO Disclosure

Disclosure against HCOs will be made for each individual activity/engagement down to department level where possible.

Cross Border Interactions

UK HCPs/ORDMs/HCOs are used globally within Lundbeck and these engagements/activities, are captured in an internal management tool to allow for disclosure by the country in which the person or organisation has its principal practice.

Consent Data

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 Code.

For 2024 activities Lundbeck had interactions with a total of 119 HCPs/ORDMs, of which 106 provided consent for individual disclosure, representing an overall disclosure rate of 89.08% and non-disclosure rate of 10.92%. Further information can be obtained from the figures given in our disclosure available from the ABPI Disclosure Portal [Disclosure UK](#).

Currency

Disclosures of ToVs for all persons and organisations are in Pound Sterling (GBP). Where a stakeholder is contracted through another Lundbeck entity currency conversion is managed within a local transparency portal to ensure appropriate and accurate conversions.

Definitions

Healthcare Professional (HCP)

Any member of the medical, dental, pharmacy or nursing profession and any other person who during their professional activities may administer, prescribe, purchase, recommend or supply a medicine. The term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional.

- Activities include but are not limited to examples such as advisory boards, consulting, chairing meetings, provision of training both to Lundbeck staff and other HCPs/ORDMs, speaking at scientific events.
- Travel/accommodation and expenses for speaking/consultancy events.
- Sponsorship to educational meetings/events where items such as travel, accommodation and registration may have been provided by Lundbeck Ltd.

Other Relevant Decision Maker (ORDM)

Someone with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply, or use of any medicine but who is not a health professional.

- Activities include but, are not limited to advisory boards, consulting, chairing meetings, provision of training both to Lundbeck staff and other HCPs/ORDMs, speaking at scientific events.
- Sponsorship to educational meetings/events where items such as travel, accommodation and

registration may have been provided by Lundbeck Ltd.

Healthcare Organisation (HCO)

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 Europe or an organisation through which one or more health professionals or other relevant decision makers provide services.

If a healthcare organisation consists of only one health professional or other relevant decision maker, then it would be subject to the requirements in the Code regarding individual health professionals.

Sponsorship to HCOs

Funding provided to an organisation running an event, for items such as exhibition space and/or an opportunity to have a promotional/non-promotional speaking engagement included.

Registration Fees

Many scientific congresses require delegates to pay a registration fee even if presenting scientific data such as a poster on a specific activity in the registration recipient's area of expertise.

Travel

Cost of public transport or car mileage at standard HMRC rate to and from home to an event, with no deviation, to attend an educational event as defined by the Code.

Accommodation

Overnight accommodation, only where absolutely necessary, to attend an educational event as defined by the Code.

Fees

Payment of honorarium for activities in relation to speaking or consultancy to Lundbeck, including preparation time such as presentation writing and post event requirements.

Expenses

Travel, accommodation, and any other associated relevant expense payable to perform a contracted service such as speaking or consulting for Lundbeck.

Multi-year engagements or activities

Occasionally contracted engagements last more than a year, and payments are made as the activity progresses. The ToVs are recorded in the year they paid for and disclosed accordingly.

Grants and Donations

Where an organisation has more than one director that is an HCP, and the organisation also has charitable and/or patient organisation status we have disclosed against the organisation as an HCO in order to provide as much transparency as possible.

Partial Attendance or Cancellation of Events

Lundbeck works with HCPs, ORDMs and HCOs to ensure that any interaction is planned and managed compliantly according to Lundbeck and ABPI Code requirements. 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 an 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.

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.

Research and Development Disclosures

Lundbeck adheres to the definition of Research and Development ToVs as defined by the Code. 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 behalf of H Lundbeck.

Management of requests regarding ToV Data

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.

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 anonymised.

Value Added Tax (VAT)

ToVs include VAT if applicable.

Further Information

For further information, please contact Lundbeck UK at united_kingdom@lundbeck.com