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# Lundbeck Ltd

## Methodological note for HCP/ORDM/HCO disclosures 2025

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# 1 Definitions

## 1.1 Recipients

Transfers of Value are disclosed to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs), and Healthcare Organisations (HCOs), as defined in Clause 1 of the 2024 ABPI Code of Practice.

HCPs are members 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.

ORDMs are individuals who influence or participate in decisions relating to the prescribing, purchasing, supply, recommendation, or use of medicines.

HCOs include any legal or organisational entity that is a healthcare, medical or scientific association or organisation, or through which one or more HCPs or ORDMs provide services.

Transfers of Value to HCPs and ORDMs are disclosed on an individual named basis unless valid consent for individual disclosure has not been obtained or has been withdrawn in which case the Transfers of Value are disclosed in aggregate in accordance with Clause 28 of the ABPI Code. Transfers of Value to HCOs are disclosed on an individual organisational basis.

Disclosure applies to recipients whose principal place of practice or registration is in the United Kingdom, which for the purposes of the ABPI Code includes the Channel Islands and the Isle of Man. Where Transfers of Value relate to cross-border activities, disclosure is made in the country where the recipient has their principal place of practice.

Disclosure for HCPs included in this data was gained through the legal basis of consent. Aggregate disclosure is applied only where individual disclosure has not been permitted under applicable data protection law.

## 1.2 Type of Transfer of Values

Transfers of Value include direct and indirect transfers of value, whether in cash, in kind or otherwise, made by Lundbeck Ltd, the parent company Lundbeck A/S or another Lundbeck affiliate to HCPs, ORDMs and HCOs, as required under Clause 28 of the 2024 ABPI Code of Practice.

For the 2025 disclosure year, Transfers of Value include, where applicable:

- Contracted services and consultancy fees, including related expenses, provided to HCPs, ORDMs or HCOs
- Contributions to the costs of events, including registration fees, travel, and accommodation.
- Sponsorship agreements with HCOs and with third-party organisations appointed by HCOs to manage events.
- Donations and grants provided to HCOs.
- Patient Support Programme-related Transfers of Value, where reportable under the ABPI Code

Transfers of Value relating to Research and Development activities, as defined in Clause 1.20 of the ABPI Code of Practice, are disclosed in aggregate only and are not itemised at recipient level.

All Transfers of Value are categorised and disclosed in line with the structure and requirements of the ABPI Disclosure UK template.

## 2 Disclosure Scope

### 2.1 Products Concerned

Transfers of Value disclosed are not attributed to individual medicinal products but relate to activities and interactions permitted under the ABPI Code of Practice, including scientific, medical, educational, and service-based engagements. Transfers of Value associated solely with Research and Development activities are excluded from individual disclosure and are reported in aggregate, as described in Section 2.10.

### 2.2 Company Concerned

The company responsible for this disclosure is Lundbeck Ltd, the United Kingdom affiliate of the Lundbeck Group. This methodological note and the associated disclosure data relate to Transfers of Value made by Lundbeck Ltd, its parent company Lundbeck A/S or other affiliates to UK based recipients within the scope of the UK ABPI Code of Practice during the 2025 disclosure year.

Transfers of Value made by other Lundbeck Group entities to non-UK recipients are disclosed separately in accordance with the applicable national codes and disclosure requirements of those countries.

### 2.3 Excluded Transfers of Value

Transfers of Value excluded from this disclosure include Transfers of Value relating solely to Research and Development activities, which are disclosed in aggregate only. Transfers of Value arising from ordinary course commercial transactions are also excluded. Certain

low-value items and general organisational costs that do not confer a direct benefit on an identifiable recipient are excluded in line with the ABPI Code of Practice.

Transfers of Value made to patient organisations are disclosed separately on the Lundbeck Ltd company website as per Clause 29.1 of the ABPI Code of Practice. Where, however, a patient organisation has one or more Directors who are active Healthcare Professionals, and a Transfer of Value is provided to such an organisation it has been included within this HCO disclosure section to ensure appropriate transparency and accurate categorisation under the Code.

## **2.4 Transfer of Value Dates**

Transfers of Value are recorded and disclosed based on the date on which the payment is made. The date of payment determines the relevant disclosure year, irrespective of when the associated activity took place, when the contract or agreement was signed, or when an invoice was issued. This approach is applied consistently across all categories of Transfers of Value, in line with the follow the money principle.

## **2.5 Direct Transfers of Value**

Direct Transfers of Value are Transfers of Value made directly by Lundbeck Ltd to an HCP, ORDM or HCO, without the involvement of an intermediary. Direct Transfers of Value are disclosed in accordance with the ABPI Code of Practice.

## **2.6 Indirect Transfers of Value**

Indirect Transfers of Value are Transfers of Value made via a third-party, where the ultimate beneficiary is an HCP, ORDM or HCO, and where Lundbeck Ltd knows or can identify the recipient who benefits from the Transfer of Value.

Examples of indirect Transfers of Value include payments made to third-party service providers, event organisers, or agencies on behalf of Lundbeck Ltd, where the benefit is provided to an identifiable recipient. Indirect Transfers of Value are disclosed in the same manner as direct Transfers of Value, in accordance with the requirements of the ABPI Code of Practice.

## **2.7 Non-Monetary Transfers of Value**

Non-monetary Transfers of Value include benefits provided in kind, rather than as a cash payment, to HCPs, ORDMs, or HCOs. Where applicable, non-monetary Transfers of Value are disclosed using their equivalent monetary value, calculated as the actual cost incurred by Lundbeck Ltd.

## **2.8 Transfers of Values in Cases of Partial Attendances or Cancellation and Refund**

Where Transfers of Value such as travel and accommodation have been arranged but the individual did not attend the event, no Transfer of Value has been disclosed as no benefit was received by the HCP or ORDM. In such cases, the costs incurred are not considered to constitute a Transfer of Value to the individual and are therefore excluded from disclosure.

## **2.9 Cross-Border Activities**

Transfers of Value relating to cross-border activities are disclosed in the country where the HCP, ORDM or HCO has their principal place of practice or registration, in line with the requirements of the ABPI Code of Practice.

H. Lundbeck A/S (parent company) has taken reasonable steps to ensure that Transfers of Value are attributed and disclosed accurately, based on the information available at the time of disclosure. Data has been collected, reviewed, and validated using internal systems and controls to support accurate allocation of Transfers of Value for cross-border activities.

Where necessary, cross-border Transfers of Value are coordinated with other Lundbeck affiliates to support accurate disclosure.

## **2.10 Research and Development (R&D)**

The total value of Transfers of Value disclosed for 2025 is higher than in the previous disclosure year, reflecting an increase in Research and Development activity during the period. This increase is primarily attributable to expanded investment in clinical development activities for trial molecules within the Lundbeck pipeline. All Research and Development Transfers of Value continue to be disclosed in aggregate, in accordance with the ABPI Code of Practice.

## **2.11 Voluntary Disclosure**

Lundbeck Ltd discloses Transfers of Value in accordance with the requirements of the ABPI Code of Practice. Where appropriate and legally permissible, Lundbeck Ltd may provide information beyond the minimum disclosure requirements in support of transparency; however, no additional categories of Transfers of Value are disclosed on a voluntary basis beyond those required under the ABPI Code.

# **3 Specific Considerations**

## **3.1 Country Unique Identifier**

A country-specific unique identifier has been used in this disclosure where available. Unique identifiers have been sourced from a well-established third-party provider

commonly used within the UK healthcare sector, to support the accurate identification of HCPs, ORDMs and HCOs.

Where a unique identifier is not included, this is because either the individual or organisation does not have an available identifier, or Lundbeck Ltd does not have access to the relevant dataset at the time of disclosure. The use of country unique identifiers is optional and dependent on availability.

## **3.2 Self-Incorporated HCP**

Where a Healthcare Professional operates through a self-incorporated entity, Transfers of Value are disclosed based on the capacity in which the individual provides the service and the nature of the engagement, in accordance with the ABPI Code of Practice.

Where the services are personally provided by an identifiable Healthcare Professional acting in an expert capacity, Transfers of Value are disclosed as relating to a Healthcare Professional, irrespective of whether payment is made to a company wholly owned or controlled by that individual.

## **3.3 Multi-Year Agreements**

Where Transfers of Value arise from multi-year agreements, only the amounts paid during the relevant disclosure year are disclosed. Transfers of Value are reported in the year in which the payment is made, irrespective of the duration of the underlying agreement or when the agreement commenced.

## **3.4 Country Specificities**

This disclosure has been prepared in accordance with the UK ABPI Code of Practice and the requirements applicable to the United Kingdom. Where relevant, UK-specific disclosure requirements and practices have been applied.

Transfers of Value relating to activities undertaken in the UK or with an HCP employed or living in the UK are disclosed in line with the recipient's principal place of practice or registration. Any UK-specific activities or arrangements that fall within the scope of disclosure are reported in accordance with the ABPI Code of Practice and associated PMCPA guidance.

## **3.5 Quality Checks**

Lundbeck Ltd has implemented appropriate internal processes and controls to support the accurate collection, review, and disclosure of Transfers of Value. Disclosure data is subject to validation and review prior to publication to help ensure completeness and accuracy in accordance with the ABPI Code of Practice.

## **4 Data Protection Legal Basis**

### **4.1 Consent Collection**

For the 2025 disclosure year, Lundbeck Ltd collected and relied on consent as the lawful basis for the disclosure of Transfers of Value relating to HCPs and ORDMs, in accordance with applicable data protection requirements.

Where consent was provided, Transfers of Value have been disclosed on an individual named basis in line with the ABPI Code of Practice.

Where consent was withdrawn prior to publication, the relevant Transfers of Value have been disclosed in aggregate in accordance with applicable data protection requirements, and where consent is withdrawn after publication of the data the process defined by the ABPI will be followed.

### **4.2 Legitimate Interests**

From January 2026, Lundbeck Ltd implemented the lawful basis of legitimate interests for the collection and processing of Transfers of Value data relating to Healthcare Professionals and Other Relevant Decision Makers. This change applies prospectively only and does not affect the collection, processing, or disclosure of Transfers of Value data for the 2025 disclosure year, which was based on consent. The use of legitimate interests supports Lundbeck Ltd.'s ongoing obligations under the ABPI Code of Practice to ensure transparency, and appropriate assessments and safeguards have been applied to ensure that the rights and freedoms of individuals are not overridden, in accordance with applicable data protection requirements.

## **5 Form of Disclosure**

### **5.1 Date of Publication**

30 June 2026

### **5.2 Disclosure Platform**

The disclosure is published on Disclosure UK, the ABPI managed public database for Transfers of Value, available at: <https://www.abpi.org.uk/reputation/disclosure-uk/>

### **5.3 Disclosure Language**

The disclosure is published in English.

## **6 Disclosure Financial Data**

### **6.1 Currency**

All Transfers of Value are disclosed in GBP. Where Transfers of Value relate to cross-border interactions and were originally incurred in a foreign currency, amounts have been converted to GBP using the Bank of England daily spot exchange rate applicable on the date of payment.

### **6.2 VAT Included or Excluded**

Transfers of Value disclosed exclude Value Added Tax (VAT).

### **6.3 Calculation Rules**

Transfers of Value are disclosed based on the actual cost incurred by Lundbeck Ltd. Where applicable, amounts reflect the gross value paid to or for the benefit of the recipient, excluding VAT. No estimates or pro-rata allocations are applied.

## **7 Additional Information**

### **7.1 Donations and Grants**

The following Donations and Grants were made to healthcare organisations in 2025:

- International Headache Society £179,000 for the training and Education of HCPs in the area of headache.
- Migraine Trust £5000.00 to support and enhance their patient advisory service.

### **7.2 Patient Support Programme**

The following healthcare organisations were provided with support by Lundbeck through a specific patient support programme in 2025 and are included within the overall Lundbeck 2025 Disclosure submission in accordance with ABPI requirements:

- Royal Stoke Hospital Neurology Department £875.64
- University Hospitals Plymouth £9315.00