

Date of publication/revision: 16 March 2018

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 (HCPs), such as researchers and doctors, and healthcare organisations (HCOs), such as hospitals, clinical practices and universities, to develop and commercialize new leading treatment options.

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 and HCOs. On our corporate website, you can find more information about our commitments:

<http://lundbeck.com/global/sustainability/ethics/HCP/intro>

The disclosure of transfers of value (ToV) in the UK is in full accordance with the ABPI Code of Practice.

Consent to Disclose

HCPs 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 to achieve the objectives of transparency under the ABPI Code of Practice.

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 to 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.

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
- Donations of textbooks provided as Medical and Educational Goods and Services (MEGS) are recorded on the date the book was sent out from the Lundbeck office.
- Travel/accommodation or meeting registration fees supported by Lundbeck are disclosed regardless of whether the HCP attended the meeting.

Consent collection and withdrawals

Consent to disclose ToVs for individual HCPs is managed annually.

Lundbeck adheres to all applicable data protection regulations and if an HCP withdraws their consent, 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, 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 and HCOs, if available. Otherwise, HCPs 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 professionally and in compliance with any global and local regulations. Cross-border activities where other Lundbeck entities have engaged a UK HCP or HCO are included in the UK disclosures.

Currency

Disclosures of ToVs for HCPs and HCOs based in the UK are made in Sterling. 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.

Direct and indirect Transfers of Value

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

Examples are, a payment transferred to an HCP'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 or HCO.

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

All ToVs are disclosed as direct ToVs where possible and according to the ABPI Code of Practice. If a HCP working through a limited company withdraws consent to disclose, ToVs are declared as aggregate.

Identifiability of HCPs and HCOs

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

For Market Research activities and for some educational activities where support is provided upon request as a donation or grant, the identity of HCPs or HCOs may not be known to Lundbeck and no tracking or disclosures are made.

Management of requests from HCPs and other stakeholders

Any HCP 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 and HCOs to always make sure that any interaction is planned professionally and managed 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 an HCP cancel's planned activities without notice, and TOV has already occurred either directly or indirectly.

Partial consent

In accordance with the ABPI Code of Practice, if consent to disclose is partially withdrawn, all ToVs to that individual 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 or HCO has a contractual relationship with Lundbeck and receives the ToV directly from 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