

# **Methodological Note**

Date of revision: September 2024

# **Lundbeck UK Ltd Methodological Note**

Supporting the implementation of the ABPI Code of Practice Disclosure of Transfers of Value to members of the public including patients and journalists for the year 2023.

#### **Preamble**

As an innovative and responsible pharmaceutical company, specialising in supporting the lives of patients living with brain diseases, Lundbeck works with and members of the public, including patients and journalists, to develop and deliver treatment options to people living with brain diseases.

We are committed to keeping 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 members of the public 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 and members of the public. For further information on our transparency commitments please see information at the following link: <a href="https://lundbeck.com/uk/sustainability/transparent-interactions">https://lundbeck.com/uk/sustainability/transparent-interactions</a>

Disclosure for HCPs/HCOs is covered in a separate methodological note published: <u>Disclosure UK (abpi.org.uk)</u>

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

### **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 member of the public attended the meeting.

#### **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 (non-UK) Lundbeck entities have engaged UK member of the public are included in the UK disclosures.

# **Currency**

Disclosures of ToVs for members of the public 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 Krone 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: <a href="https://www.lundbeck.com/uk/privacy-notice-healthcare-professionals">https://www.lundbeck.com/uk/privacy-notice-healthcare-professionals</a>

#### **Definitions**

#### MEMBER OF THE PUBLIC

- An individual who is a member of the UK populace and is not a health professional as defined in clause 1.9 of the ABPI Code of Practice
- Patient: An individual who is a member of the UK populace, is not a health professional as defined by clause 1.9 of the ABPI Code of Practice and is prescribed a Lundbeck product
- Journalist: An individual whose occupation is to report news-worthy events and information in the press

#### Direct and indirect Transfers of Value

Direct ToVs are those made directly from Lundbeck to a member of the public.

Examples are, a payment transferred to a member of the public'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 member of the public.

Examples include an agency working on Lundbeck's behalf booking transportation for a member of the public working through a limited company.

# Identifiability of members of the public

Lundbeck track and disclose all activities where the member of the public can be identified by Lundbeck. For most of Lundbeck's activities this is the case.

For Market Research projects the identity of members of the public may not be known to Lundbeck and no tracking or disclosures are made.

# Management of requests from members of the public

Any member of the public 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 or members of the public 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 member of the public 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 member of the public 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 ABPI Code of Practice. All ToVs related payments to members of the public concerned with the planning and conduct of clinical studies in the UK 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 anonymised.

# Value Added Tax (VAT)

ToVs include VAT if applicable.

#### **Further Information**

For further information, please contact Lundbeck UK at <a href="mailto:united\_kingdom@lundbeck.com">united\_kingdom@lundbeck.com</a>