



Version: June 2026

Country: United Kingdom

Lundbeck Ltd

Methodological note for Patient Organisation Disclosures 2025

Data Year: 2025

Year of Publication: 2026

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1 Definitions

1.1 Recipients

Patient organisations are non-profit organisations that represent and/or support patients, carers and the wider public.

Patient Organisations are the primary recipients in scope; interactions with patients, members of the public, or journalists are included only where required under the Association of the British Pharmaceutical Industry (ABPI) Code of Practice 2024.

1.2 Types of Support and Transfers of Value

Transfers of Value include financial and non-financial support such as grants, donations, sponsorship, contracted services, fees, expenses, and non-financial support.

2 Disclosure Scope

2.1 Activities Covered

This disclosure covers relevant support provided during 2025 by Lundbeck Ltd in line with the ABPI Code. The recipients benefitting from the support are listed on the template recording disclosures which can be found on [Lundbeck.co.uk](https://www.lundbeck.co.uk).

2.2 Excluded Transfers of Value

Transfers of Value excluded from this disclosure are those which are disclosed within the ABPI Disclosure Portal for Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs), and the aggregate amount related to Research and Development for the year 2025.

Transfers of Value arising from ordinary course commercial transactions are also excluded.

2.3 Date of Transfers of Value

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.

2.4 Direct Transfers of Value

Direct Transfers of Value are Transfers of Value made directly by Lundbeck Ltd to a Patient Organisation, Member of the Public or Journalist without the involvement of an intermediary. Direct Transfers of Value are disclosed in accordance with the ABPI Code of Practice 2024.

2.5 Indirect Transfers of Value

Indirect Transfers of Value are Transfers of Value made via a third party, where the ultimate beneficiary is a Patient Organisation, Member of the Public or Journalist and where Lundbeck Ltd knows or can identify the recipient who benefits from the Transfer of Value.

2.6 Cross-Border Activities

Transfers of Value relating to cross-border activities are disclosed in the country where the Patient Organisation is registered or based, or where the patient, member of the public or journalist primarily resides, as applicable.

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.

2.7 Voluntary Disclosure

Lundbeck Ltd discloses Transfers of Value in accordance with the ABPI Code of Practice 2024. Additional contextual information may be provided where appropriate; however, no additional categories of Transfers of Value beyond those required under the Code are disclosed.

3 Specific Considerations

3.1 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.

3.2 Aggregate Disclosure

Aggregate disclosure is used where Patients, Members of the Public, or Journalists receive a Transfer of Value so as to protect individual privacy in line with the ABPI Code of Practice 2024.

3.3 Country Specificities

This disclosure has been prepared in accordance with the UK ABPI Code of Practice in accordance with Clauses 29 and 30.

3.4 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

4.1 Data Protection Approach

Lundbeck Ltd processes personal data relating to disclosure activities in accordance with applicable UK data protection legislation, including the UK General Data Protection Regulation and the Data Protection Act 2018. For Patient Organisations, disclosure is made on an individual organisation basis in line with the requirements of the ABPI Code of Practice 2024 and consent is not required, as Patient Organisations are legal entities rather than natural persons. Where Transfers of Value relate to patients, members of the public or journalists, Lundbeck Ltd does not publicly disclose personal names and such Transfers of Value are reported on an aggregated basis in order to meet the transparency requirements of the ABPI Code while protecting individual privacy.

5 Form of Disclosure

5.1 Date of Publication

30 June 2026

5.2 Disclosure Platform

The disclosure data for Patient Organisations can be found on [Lundbeck.co.uk](https://lundbeck.co.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 Organisations with HCPs as part of their board

Where a Patient Organisation is considered to fall within the definition of a Healthcare Organisation for transparency purposes, the relevant disclosure has been made via the HCP/HCO disclosure template on the ABPI Disclosure Portal.