

Lundbeck Methodological Note

Implementing the EFPIA Code of Practice

June 2026 (edition 11)

Lundbeck



Content

1. Introduction
2. Terminology
3. Definitions
 - 3.1 Recipients
 - 3.1.1 HCPs
 - 3.1.2 HCOs
 - 3.1.3 POs/PAGs
 - 3.2 Kind of ToVs
 - 3.2.1 Donations and Grants
 - 3.2.2 Contribution to costs of events
 - 3.2.3 Fees for Service and Consultancy
 - 3.2.4 Research & Development (R&D)
4. Disclosure's scope
 - 4.1 Products concerned
 - 4.2 Company concerned
 - 4.3 Excluded Transfer of value
 - 4.4 Transfers of Value date
 - 4.5 Direct Transfer of Value
 - 4.6 Indirect Transfers of Value
 - 4.7 Non-monetary transfers of value
 - 4.8 Transfers of value in case of partial attendance or cancellation and refund
 - 4.9 Cross-border activities
 - 4.10 R&D
 - 4.11 Voluntary Disclosure
5. Specific considerations
 - 5.1 Country unique identifier
 - 5.2 Self-incorporated HCP
 - 5.3 Multi-year Agreement
 - 5.4 Quality checks
6. Data protection legal basis
 - 6.1 Consent Collection
 - 6.1.1 Partial consent
 - 6.2 Legitimate Interest
 - 6.2.1 The legitimate interests
 - 6.2.2 Necessity of processing
 - 6.2.3 Balance of interests
 - 6.2.4 Right to object
7. Form of Disclosure
 - 7.1 Date of Publication
 - 7.2 Disclosure Platform
 - 7.3 Disclosure Language
8. Disclosure Financial Data
 - 8.1 Currency
 - 8.2 VAT Included or Excluded
 - 8.3 Calculation rules
9. Additional Information
 - 9.1 Dispute management

1. Introduction

Lundbeck is a global pharmaceutical company that collaborates with Healthcare Professionals (HCPs), Healthcare Organizations (HCOs) and Patient Organizations (POs) in connection with research, clinical development, scientific exchange, educational activities, and the provision of healthcare-related services. These interactions contribute to the advancement of treatments for people living with psychiatric and neurological disorders.

This Methodological Note describes the principles applied by Lundbeck in the collection, calculation and disclosure of Transfers of Value (ToV). It is intended to support transparency by providing information on the scope of the disclosure, the categories of ToV reported, and the approach adopted by Lundbeck in preparing its annual disclosure in accordance with the EFPIA Disclosure Code and applicable local requirements.

Interactions described by this Note are governed by applicable laws and regulations, industry codes of practice, including the EFPIA Disclosure Code, and Lundbeck's internal policies and procedures.

As part of its commitment to transparency, Lundbeck discloses payments and other ToVs made to HCPs, HCOs and POs in accordance with applicable legal requirements and industry self-regulation. In line with the EFPIA Disclosure Code, Lundbeck publishes information annually regarding Transfers of Value provided during the preceding reporting period. Disclosures are made by Recipient and disclosure category and reflect the total value transferred in connection with the relevant activities.

Where individual disclosure is not permitted under applicable law or where a Recipient has exercised a right that prevents individual disclosure, the relevant Transfers of Value are reported on an aggregate basis in accordance with the EFPIA Disclosure Code and applicable local requirements.

2. Terminology

Standard abbreviations or terms used in this document:

AdBoard – Advisory Board
CRO – Clinical Research Organization
EFPIA – European Federation of Pharmaceutical Industries and Association
FMV – Fair Market Value
GLC – Global Legal & Compliance
HCO – Healthcare Organization
HCP – Healthcare Professional
HCPM – HCP manager local compliance representative
Lundbeck – H. Lundbeck A/S and its affiliates
NIS – Non- Interventional Studies
MYA – Multi-year agreement
OTC – Over-the-counter drugs that can be purchased without prescription, and not reimbursed
PAG – Patient Advocacy Group
PCO- Professional Congress Organizer
PO – Patient Organization
POM – Prescription Only Medicine (Rx)
SOP – Standard Operating Procedure
ToV – Transfer of Value

3. Definitions

3.1 Recipients

3.1.1 HCOs

Lundbeck follows EFPIA definition of an HCO.

EFPIA definition: “any legal person/entity (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for POs within the scope of article 21) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.”

Local approach follows the same principles plus applicable national requirements.

3.1.2 HCPs

Lundbeck follows EFPIA definition of an HCP.

EFPIA definition: “any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product and whose primary practice, principal professional address or place of incorporation is in Europe. For the purpose of this Code, the definition of HCPs includes: (i) any official or employee of a government, agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and (ii) any employee of a Member Company whose

primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of Medicinal Products”

Local approach follows the same principles plus applicable national requirements.

3.1.3 POs/PAGs

Lundbeck follows EFPIA definition of a PO (which is an umbrella term that includes PAGs).

EFPIA definition: “non-for-profit legal person/entity (including the umbrella organization to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of “incorporation or primary place of operation is in Europe.

Local approach follows the same principles plus applicable national requirements.

3.2 Kind of ToVs

3.2.1 Donations and Grants

- An Educational Grant is funding provided to eligible medical associations or patient organizations to support independent medical education initiatives. Eg. may include, but are not limited to, projects, awards, fellowships, and scholarships.
- A Research Grant is financial support provided to HCOs or third parties to support development of healthcare science, continuing medical education for specialists, or the creation of scientific or educational materials for use at scientific conferences. Such support is provided only for non-promotional activities or materials. Lundbeck must not receive any direct or indirect benefit in return.
- A Donation is a charitable or humanitarian contribution granted to an eligible non-profit third-party organization. These contributions are provided without any expectation of commercial advantage, service, or other benefit to Lundbeck in return.

Lundbeck follows the above descriptions that are in line with EFPIA definition.

Local approach follows the same principles plus applicable national requirements.

EFPIA definition: “collectively, mean providing funds, assets or services freely given for the purpose of supporting healthcare, scientific research or education, with no consequent obligation on the recipient to provide goods or services to the benefit of the donor in return.”

3.2.2 Contribution to costs of events

Lundbeck is disclosing ToVs related to events contribution at individual level for HCPs that have provided their consent for publication and for all HCOs, in line with EFPIA code. ToV to HCPs that have not provided consent shall be published in aggregated form if locally allowed.

ToV in this section can be divided into Third-Party organized events and Standalone events organized solely by Lundbeck.

“Third-party events” are organized by an independent third party, such as HCP Associations, Scientific Societies, etc., and are usually executed in the form of Scientific Congress, Symposia, Research Forums and Professional Conventions, etc.

- HCPs Sponsorship: Lundbeck may sponsor HCPs to attend congresses or other events to support the advancement of their medical and scientific knowledge, including the scientifically appropriate use of medicines. Such sponsorship may include event registration fees, travel, accommodation, and meals (hospitality). As no services are provided by the HCP in connection with the attendance, no compensation for time or activities is paid.
- Congress Sponsorship: Lundbeck can sponsor a third-party events like congresses, receiving in exchange services such as a slot for an Lundbeck satellite symposium (educational activity independently organized by Lundbeck and held within the congress, the admission of employees to the Congress) or a scientific booth. The ToVs related to sponsorships are always made to registered organizations (HCO or PCO)

Lundbeck standalone meetings are organized to meet legitimate scientific, medical and educational needs, including the provision of information on relevant therapeutic areas, treatment options and Lundbeck medicinal products. Hospitality provided to participating HCPs is offered in accordance with applicable legal, regulatory and industry requirements.

Disclosed ToV includes travel, accommodation, and other reportable expenses provided to HCPs in connection with their attendance. General event-related costs, such as venue rental, meeting facilities, presentation equipment and other organizational expenses, are not allocated to individual HCPs and are therefore excluded from disclosure.

“Contribution to costs of events” report section is divided into 3 sections:

- Registration fees
- Sponsorship agreements
- Travel and accommodation

Hospitality provided in all cases is in line with EFPIA Code of Practice and its national implementations which Lundbeck follows.

Local approach follows the same principles plus applicable national requirements.

Additional guidance EFPIA “When a Member Company contributes to the costs related to Events through PCOs, the following reporting approaches are considered compliant with EFPIA reporting requirements:

- All ToVs to an HCO (either as Recipient or as Beneficiary) are reported in the relevant category under the name of the HCO
- ToVs through PCOs are reported:
 - either in the name of benefitting HCO (through include the name of Recipient PCO), if not included in direct ToVs to the HCO;
 - or in the name of Recipient PCO (to the benefit of include the name of benefitting HCO)” (Code ANNEX B)

3.2.3 Fees for Service and Consultancy

Lundbeck can contract HCP or HCO for services that can be provided by HCP/HCO. This relation is based on scientific and/or medical expertise, knowledge, and experience in a particular therapeutic area. Such collaborations are established only when there is a genuine scientific and/or business requirement that cannot be met using internal resources.

Lundbeck may engage healthcare professionals and other service providers for legitimate professional services that require their time, expertise, and scientific input. In such cases, Lundbeck may provide remuneration for the services performed and reimburse reasonable related expenses, such as travel costs.

Eg.:

- Consultancy activities
- Scientific or medical presentations
- Advisory insights and expertise

Any remuneration provided for these services must comply with applicable laws, relevant Codes of Practice, and national FMV requirements. Compensation must also be proportionate to the services provided and documented in a written agreement.

3.2.4 Research & Development (R&D)

Lundbeck discloses ToV to HCPs or HCOs as per the EFPIA Code; related to the planning and conduction:

- Non-clinical studies
- Clinical trials
- Non-interventional studies - that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study

Definitions: Non-clinical studies (Source: OECD Principles on Good Laboratory Practice): Non-clinical health and environmental safety study, henceforth referred to simply as "study", means an experiment or set of experiments in which a test item is examined under laboratory conditions or in the environment to obtain data on its properties and/or its safety, intended for submission to appropriate regulatory authorities.

Clinical trials (Source: OECD Principles on Good Laboratory Practice): Any investigation in human subjects intended to discover or verify the clinical, pharmacological and/or other pharmacodynamic effects of one or more investigational medicinal product(s), and/or to identify any adverse reactions to one or more investigational medicinal product(s) and/or to study absorption, distribution, metabolism and excretion of one or more investigational medicinal product(s) with the object of ascertaining its (their) safety and/or efficacy.

Non-interventional studies (Source: OECD Principles on Good Laboratory Practice): Studies where the medicinal product(s) is (are) prescribed in the usual manner in accordance with the terms of the marketing authorization. The assignment of the patient to a particular therapeutic strategy is not decided in advance by a trial protocol but falls within current practice and the prescription of the medicine is clearly separated from the decision to include the patient in the study. No additional diagnostic or monitoring procedures shall be applied to the patients, and epidemiological methods shall be used for the analysis of collected data.

Examples of R&D ToV that are disclosed in this section (if the related study falls into the EFPIA definition of R&D):

- Advisory Board participation
- Speaker agreements
- Consulting agreements
- Service agreements
- Collaboration agreements
- Clinical study agreements

- Investigator meetings
- Ethics committee fees

Supplementary patient care services

EFPIA: "Payments made for research and development activities are disclosed in aggregate. For the purposes of the disclosure, these activities are defined as transfers of value to HCPs or HCOs related to the planning or conduct of:

- non-clinical studies (as defined in OECD Principles on Good Laboratory Practice)
- clinical trials (as defined in Directive 2001/20/EC); or
- non-interventional studies (NIS) that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study "(Section 18.01 of the EFPIA Code).

EFPIA: "Transfers of Value relating to NIS that are not within the definition of R&D ToVs under the EFPIA Disclosure Code must be reported on an individually named basis. For sake of clarity, activities not falling within the definition of R&D ToVs, including NIS that are not conducted to maintain a marketing authorization (in application and following definitions of the "Clinical Trials" Regulation 536/2014), will be disclosed under "consultancy/fee-for-services" (Code ANNEX B)

Local approach follows the same principles plus applicable national requirements.

4. Disclosure's scope

4.1 Products concerned

Lundbeck reports all transfers of value to healthcare professionals, healthcare organizations, and patient organizations/patient advocacy groups in connection with the prescription-only medicines it produces and the new medicinal compounds it is developing.

Local approach follows the same principles plus applicable national requirements.

4.2 Company concerned

Reported disclosure covers ToV to HCPs, HCOs and POs/PAGs who practice or are registered in countries where the EFPIA Code of Practice requires disclosure, and covers activities carried out by Lundbeck, its affiliates, and any acquired or merged companies.

4.3 Excluded Transfer of value

When disclosing ToVs , as general principle, Lundbeck fully follows EFPIA rules related to ToV excluded from the scope.

Local approach follows the same principles plus applicable national requirements.

EFPIA: "Without limitation, ToVs that (i) are solely related to over-the-counter medicines; (ii) are not listed in Section 23.05 of this article, such as Items of Medical Utility (governed by Article 17), meals (governed by Article 10, especially Section 10.05), Medical Samples (governed by Article 19); or (iii) are part of ordinary course purchases and sales of Medicinal Products by and between a Member Company and a HCP (such as a pharmacist) or a HCO do not fall within the scope of the disclosure obligation described above in "General Obligation"." (Code of Practice Art. 23)

4.3.1. Market Research

In case of ToV related to market research, three different situations may occur:

- The names of the respondent HCPs are not known, the ToV is not disclosed
- The names of the HCPs are known, and their disclosure consent has been obtained, where consent is required, the ToV is disclosed at individual level
- The names of the HCPs are known, and their disclosure consent has not been obtained (refusal of the HCP). Where consent is required, the ToV is disclosed as part of aggregate.

Local approach follows the same principles plus applicable national requirements.

EFPIA: "The Member Company knows the identity of the HCP/HCO participating in activities defined as market research, the Member Company should disclose it in the "Fees for Service and Consultancy" category. Limited market research, such as one-off phone interviews or mail/e-mail/ internet questionnaires are excluded from the scope of this Article 15, provided that the HCP, HCO's member or PO's Representative is not consulted in a recurring manner (either with respect to the frequency of calls generally or of calls relating to the same research) and that the remuneration is minimal. (Code of practice Section 15.04.)

4.4 ToVs date

R&D activities (including non-interventional studies and Phase II, III and IV clinical trials):
The invoice issue date is used as the reporting date.

Muti Year Agreements (MYAs) and other arrangements involving multiple payments:
The payment date is used as the reporting date.
Where payments are made across multiple reporting periods, each payment is disclosed in the reporting period in which it was made.

Direct ToV not linked to an event (e.g. fees for service or consultancy):
The reporting date is the invoice receipt date or the payment date, as applicable.

Indirect ToV not linked to an event (e.g. fees for service or consultancy):
The reporting date is the invoice receipt date or the payment date, as applicable.

Direct ToV linked to an event
Where the information is sourced from Lundbeck's financial systems, the payment date is used as the reporting date.
Where the information is collected outside the financial systems, the reporting date is the date of the event or, in the case of a multi-day event, the first day of the event.

Indirect ToV linked to an event:
The reporting date is the date of the event or, in the case of a multi-day event, the first day of the event.

As a general principle, Transfers of Value are disclosed in the reporting period determined by the applicable reporting date for the underlying activity or payment.

4.5 Direct ToVs

Lundbeck discloses direct and indirect ToVs as defined in the Code. Direct ToVs refer to payments made directly by Lundbeck for the benefit of a Recipient.

4.6 Indirect ToVs

Indirect ToVs are payments made on behalf of Lundbeck by a third party for the benefit of a Recipient, where the Recipient knows or can identify the Member Company providing the ToV. Third parties may include affiliates (including foundations), partners, agents, contractors, and Clinical Research Organizations (CROs).

This also covers transfers of value between Lundbeck and POs, which are reported separately in PO-specific disclosures.

Local approach follows the same principles plus applicable national requirements.

4.7 Non-monetary ToVs

For non-monetary ToVs, an equivalent monetary value is determined using the applicable local market rate, meaning the price a private individual would typically pay to purchase a comparable good, article, material, product, or similar item.

Local approach follows the same principles plus applicable national requirements.

4.8 ToVs in case of partial attendance or cancellation and refund

Lundbeck discloses only effective transfers of value. Regarding contributions related to event costs, if an HCP is registered but does not attend the meeting, no associated to "no-show" costs will be reported in the HCP's name.

Local approach follows the same principles plus applicable national requirements.

4.9 Cross-border activities

Lundbeck defines cross-border ToV in accordance with the EFPIA Code as monetary or non-monetary payments initiated by a Lundbeck affiliate or the corporate department, where the Recipient's primary place of practice is in a different country.

Eg. if Lundbeck Germany sponsors an HCP whose principal country of practice is Spain, Lundbeck Spain will be responsible to include this ToV in their Disclosure.

Local approach follows the same principles plus applicable national requirements.

4.10 R&D

Lundbeck recognizes two types of expenses connected with conducting R&D activities:

Payments Through CROs

Contracts with CROs have been revised to include obligations requiring CROs to provide Lundbeck with detailed information on indirect ToVs benefiting HCPs/HCOs.

Accordingly, indirect ToVs provided through CROs for the benefit of HCPs/HCOs are disclosed within the R&D section as an aggregate.

However, fees paid directly by Lundbeck to CROs for the services they provide are excluded from the scope of the disclosure.

Direct R&D Expenses

These types of ToV cover the same scope as payments made through CROs but are paid and/or carried out directly by Lundbeck Corporate or Lundbeck Affiliates. R&D expenses are disclosed on an aggregate basis for each country and include both direct and indirect payments.

Supplementary Services

Hospital services performed by non-medical staff may either support patient care as part of clinical trial or involve non-patient-related activities, such as data management, which are commonly outsourced to specialized service providers.

1. Supplementary services that are directly linked to patient care in the context of a clinical trial fall within the scope of the Code and are therefore disclosed on an aggregate basis.
2. In contrast, services that are not directly related to patient care are treated as business-to-business transactions and therefore fall outside the scope of the Code's disclosure obligations.

Local approach follows the same principles plus applicable national requirements.

4.11 Voluntary Disclosure

Lundbeck follows the EFPIA Disclosure Code for the reporting of ToVs to HCPs, HCOs and within the R&D category, and also reports support provided to POs/PAGs.

Local approach follows the same principles plus applicable national requirements.

5. Specific considerations

5.1 Country unique identifier

Lundbeck has implemented a dedicated internal system that assigns a unique identifier to each HCP and HCO, enabling the accurate allocation of each ToV to the appropriate Recipient.

Local approach follows the same principles plus applicable national requirements.

5.2 Self-incorporated HCP

As a general principle, Lundbeck classifies a self-employed HCP operating through a legal entity consisting solely of that individual as an HCP and discloses it accordingly. However, where local

regulations require otherwise, or under specific circumstances, self-incorporated HCPs may be disclosed as HCOs.

Local approach follows the same principles plus applicable national requirements.

5.3 Multi-year Agreement

Certain engagements span more than one reporting cycle, with payments made as activities are completed and corresponding invoices are received. Transfers of value are recorded in the reporting cycle during which they are provided and disclosed by the applicable due date.

Eg. an HCP may be engaged to speak at a scientific meeting taking place in December. In such cases, travel and accommodation expenses are recorded on the date of the meeting, while the fee for services may be paid up to 60 days later, i.e. in the following reporting cycle

Local approach follows the same principles plus applicable national requirements.

5.4 Quality checks

Lundbeck uses a variety of systems and tools to support accurate documentation, tracking, monitoring, and archiving all data related to ToVs. These processes are designed to ensure consistency, transparency, and compliance with applicable reporting and disclosure requirements. As part of Lundbeck's approach, continuous training is provided to relevant employees and third parties to support the proper management of ToV-related data and ensure compliance with internal procedures and applicable compliance standards.

6. Data protection legal basis

Lundbeck processes and discloses Transfers of Value (ToV) in accordance with Article 6 of the GDPR. However, the applicable legal basis for individual disclosure may vary depending on national implementation requirements and local regulatory frameworks.

6.1 Consent Collection

Where consent serves as the legal basis for disclosure, a consent provision is included in the relevant engagement agreement. HCP's most recent consent status is applied for the applicable reporting period. ToVs are disclosed on an individual basis where valid consent has been provided and on an aggregate basis where consent has been withheld or withdrawn.

To maximize the level of individual disclosure of ToV to HCPs, Lundbeck has implemented appropriate measures in accordance with applicable data protection and privacy requirements.

As a general principle, Lundbeck discloses ToV related to HCOs, PCOs, and POs without requiring consent, as these entities are considered legal entities.

Local approach follows the same principles plus applicable national requirements.

6.1.1 Consent withdrawal

H. Lundbeck A/S Corporate and Lundbeck affiliates provide all relevant consent providers with a straightforward process for withdrawing their consent to individual disclosure publication. Consent providers are informed of the relevant local contacts for submitting requests or raising disputes. A central email contact, compliance@lundbeck.com, is available to handle requests from HCPs and HCOs.

6.1.2 Partial consent

In accordance with EFPIA guidance, Lundbeck does not permit partial consent to disclosure. Any consent provided by an HCP applies to all ToV attributable to that HCP for the relevant reporting period.

6.2 Legitimate Interest

6.2.1 The legitimate interests

In accordance with Articles 13 and 14 of the GDPR, Lundbeck provides HCPs with transparent information regarding the processing of their personal data. This information includes the rights available to data subjects, the procedures for submitting requests in relation to those rights, and, where applicable, the right to object to the individual disclosure of ToV. Healthcare professionals are also informed of the legal basis for the processing, including any legitimate interests relied upon by Lundbeck.

6.2.2 Necessity of processing

Lundbeck follows the EFPIA Disclosure Code to increase transparency around the support and transfers of value provided by the pharmaceutical industry to HCPs, HCOs and POs. This approach helps strengthen public trust and promote ethical conduct across the industry. To meet these transparency requirements, it is necessary to process certain personal data relating to Recipients.

6.2.3 Balance of interests

- ToVs are disclosed only where they relate to a legitimate professional activity or engagement undertaken by the Recipient and reflect reimbursement or compensation associated with that activity.
- The categories of ToVs subjects to disclosure include, among others, registration fees, travel and accommodation expenses related to events, as well as fees and associated expenses arising from service and consultancy arrangements.
- The personal data processed for disclosure purposes is limited to the minimum information necessary to fulfil the applicable transparency and reporting requirements. No sensitive personal data or other special categories of personal data are collected, stored or processed in connection with these disclosures.
- The information disclosed relates to Recipients in their professional capacity and concerns professional interactions with Lundbeck. As such, the data is generally considered less sensitive than information relating to an individual's private or personal affairs.
- Lundbeck is committed to handling personal data in compliance with applicable data protection requirements and to respecting the rights of data subjects. Where processing is based on legitimate interests, this includes appropriately considering and responding to any objections raised by individuals in accordance with applicable law.

6.2.4 Right to object

Each relevant Recipient is entitled to decline consent to the publication of their personal data in relation to the disclosure of ToV. In cases where consent is not granted, the relevant ToV is included in aggregate disclosures and is not reported on an individual basis.

7. Form of Disclosure

7.1 Date of Publication

Lundbeck follows EFPIA requirements for due date of publication, that is June 30th for previous calendar year reporting cycle.

Local approach follows the same principles plus applicable national requirements.

7.2 Disclosure Platform

Disclosure reports are publicly accessible via the platform established under the local Transparency Code, Association, Law and through the Lundbeck corporate website. A complete list of all relevant Lundbeck disclosures can be found here:

<https://www.lundbeck.com/global/our-business/compliance/transparent-interactions>

EFPIA: "Member Companies must ensure that all reports are accessible from a central company website. Where central platforms exist (such as one provided by the relevant governmental, regulatory or professional authority or body or a Member Association), a link to the applicable central platforms for each country must be available on the central company websites." (Code of practice Annex B)

7.3 Disclosure Language

Lundbeck discloses ToV in accordance with EFPIA guidance and publishes it in both the local language and English.

EFPIA: "Disclosures must be made in the language(s) prescribed in the National Code by the relevant Member Association. Member Companies are encouraged to make disclosures in English in addition to the mandatory disclosures in the local language (if other than English). (Code of practice Section 23.04)

8. Disclosure Financial Data

8.1 Currency

Lundbeck presents all disclosed amounts in the local currency of the country of disclosure, regardless of the currency in which the transfer of value was originally made.

Where a transfer of value occurs in a different currency, the amount is converted into the local currency using the exchange rate in effect on the date the transfer was made.

8.2 VAT Included or Excluded

Each Lundbeck Affiliate can disclose ToV as gross, or net value based on local regulatory framework. As principal, Lundbeck discloses ToVs as net amounts, excluding VAT; however certain travel and accommodation expenses may include VAT.

8.3 Calculation rules

Transfers of Value (ToV) are calculated and disclosed in accordance with the EFPIA Disclosure Code and applicable local disclosure requirements. Amounts are reported based on the value transferred to the Recipient during the relevant reporting period and assigned to the appropriate disclosure category.

Treatment of Non-Attendance and Cancellation Costs

- Where an HCP does not attend a meeting or event for which arrangements have been made ("no-show"), only the Transfers of Value attributable to actual attendees are disclosed.
- Where costs are calculated based on the actual number of participants, the total cost is allocated across the actual attendees.

In both cases, the resulting per-participant amount is disclosed only for those HCPs who actually attended the event. No amount is attributed to non-attendees or Lundbeck personnel.

Cancellation fees, penalties, or other charges arising from cancelled arrangements are not considered Transfers of Value and are therefore excluded from disclosure.

9. Additional Information

9.1 Dispute management

Lundbeck has established a responsive dispute-handling process in which every question or claim is centrally recorded and followed up.

Process covers the following instances:

- Respond to HCPs and HCOs inquiries and claims within a reasonable timeframe
- Ensure appropriate and consistent follow-up

Please visit www.lundbeck.com or reach out to compliance@lundbeck.com.