

Contents	Overview	1. Our patients, our consumers, our industry	2. Our company	3. Our colleagues	4. Our world	More information	Glossary

- 3 Our code of conduct overview
- 4 Our values and expectations
- 5 How can we make the right decision every time?
- 6 Industry regulations and laws are vital to our work
- 6 Implications of not following this code of conduct
- 7 Using your voice: How to speak up
- **7** Zero tolerance for retaliation

# 1. Our patients, our consumers, our industry

- **10** Protecting our patients and consumers
- 11 Conducting research safely
- 11 Managing the quality of our products effectively

# 2. Our company

- 13 Gifts or hospitality
- **13** Following the right financial procedures
- 13 Working with suppliers
- 14 Managing records properly
- **14** Handling personal information with care
- 14 Relevant, up-to-date records and information
- 14 Collecting competitive intelligence ethically
- 14 Data integrity
- 15 Safeguarding GSK assets
- 15 Using Technology Professionally
- **15** GSK devices for personal use
- 15 Returning GSK devices
- **15** We are all stewards of our reputation
- 15 Using social media

# 3. Our colleagues

- **17** Acting with individual integrity and courage
- **18** A healthy and safe workplace
- 19 Our colleagues

# 4. Our world

- 21 Our commitment to human rights
- 21 Meeting our challenging sustainability targets
- 21 Working with wider communities

### More information

22 Where to find more information

### **Glossary**

23 Glossary



# Our code of conduct – overview



You can use keywords to help find related policies in our written standards resource centre on Connect GSK.

Look for this icon for further information.

At GSK, we believe it's not just what we achieve that counts, it's also how we achieve it.

We are a science-led global healthcare company with a purpose to improve the quality of human life by helping people do more, feel better and live longer. This code guides all our actions and is key to the delivery of our strategy – to bring high-quality healthcare products to as many people as possible, to prevent and treat disease and to keep people well with our scientific and technical knowledge and talented people.

We do this by making good choices and taking responsibility and accountability for them.

#### Living our values and expectations

Everyone who works for or on behalf of GSK must abide by the law, but our code of conduct goes beyond that. It also establishes the standards and policies that help us meet the commitments of our heavily regulated industry and work as a high performing team. Our values and expectations help define us, build trust with society and direct us to do the right thing every day.



### This code will help you to:

- 1. Understand our values and expectations
- 2. Use them to guide your everyday actions and decision making
- 3. Understand our core standards that uphold ethical behaviours

Overview

Our patients, our consumers, our industry Our company

Our colleagues

Our world

More information

Glossary



# Our values and expectations

Our values and expectations work hand in hand to guide our actions and decision making, so we can become one of the world's most innovative, best performing and trusted healthcare companies.



### Our values:

We are proud of our values. They are non-negotiable and guide everything we do.

Patient focus is about always doing the right thing for patients and consumers and striving for the highest quality.

**Transparency** helps us build trust with each other and with society by being honest and open about how and what we do.

**Respect** means supporting colleagues and the communities around us, and embracing diversity and individuality, so we can all achieve great things.

**Integrity** is about how we expect the highest ethical behaviours of ourselves and others.



### **Our expectations:**

To thrive in an ever-changing world and achieve our purpose, we need behaviours that keep us competitive, while staying true to our values. That's why we have our four expectations.

**Courage** means setting high ambitions, setting an accelerated pace, making decisions even when it's difficult and speaking up when we see an opportunity to improve.

Accountability is about taking ownership, prioritising work that supports our strategy and delivering what we promise.

**Development** encourages us to bring the outside in and learn from others, and to ask for and give feedback, so we can continually grow as individuals, teams and as an organisation.

**Teamwork** is about all of us working better together on aligned objectives, understanding how our work contributes to our Innovation, Performance and Trust priorities, encouraging diversity of thinking and inspiring and doing everything we can to make sure we include each other.

Overview

Our patients, our consumers, our industry Our company

Our colleagues

4. Our world More information

Glossary

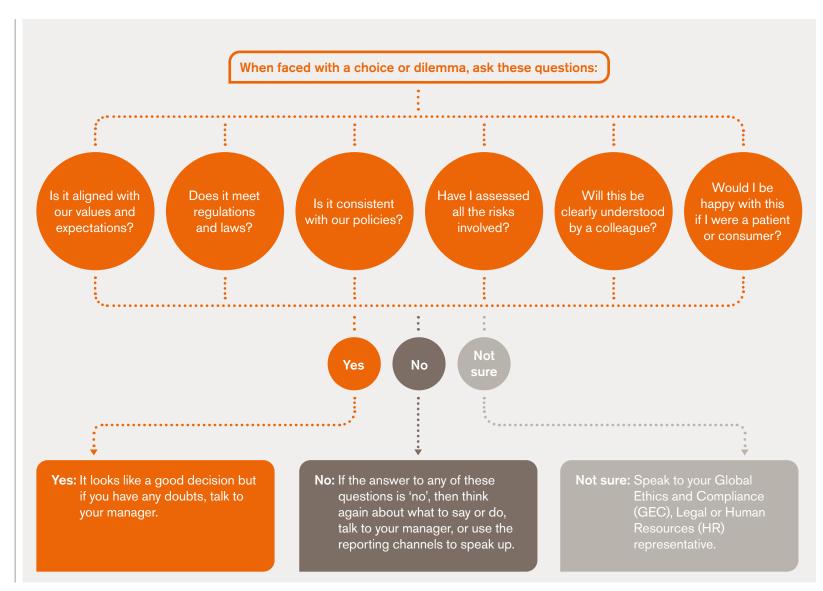


### How can we make the right decision every time?

While GSK's written standards help us address the significant risks we face, it's not possible to cover every eventuality.

## What to keep in mind when making a decision or taking action:

- Our values and expectations
- Appropriate regulations, standards and laws
- Any risks that could arise
- The possible impact on our patients and consumers, our company and ourselves



Overview

Our patients, our consumers, our industry

Our company

Our colleagues

4. Our world More information

Glossary



# Industry regulations and laws are vital to our work

We are committed to abiding by country laws and regulations that apply to our company across the world. When local laws, regulations, applicable industry codes or other business specific GSK standards are stricter than our global written standards, we work to comply with the strictest requirements. For example, we follow the UK Bribery Act (2010) and the US Foreign Corrupt Practices Act (1977) throughout all our businesses globally, as well as individual countries' anti-corruption and competition laws, wherever we operate. Complying with these regulations ensures we conduct our business on equal terms with no unfair advantages.

If you are unsure about the impact of different countries' laws on your local activities, check with your aligned Legal and/or Global Ethics and Compliance (GEC) representative(s). For more information on our written standards visit our written standards resource centre on Connect GSK.

### Implications of not following this code of conduct

Our corporate standards and policies apply to everyone who works for or on behalf of GSK. Failure to comply with them or any other applicable legal and regulatory requirements may result in disciplinary action, up to and including dismissal or termination of contract or assignment. For senior managers, this could also include financial recoupment for significant misconduct. Managers also have the responsibility to ensure their teams understand and follow this code of conduct and applicable written standards.

Subject to local requirements, violations of this code of conduct by agency workers will be reported to their respective agencies. Violations of the code of conduct by all other complementary workers may result in termination of contract (subject to local requirements).



# Using your voice: How to speak up

When we all do the right thing and live our values and expectations, we build trust in GSK and protect our license to operate.

We are each accountable for speaking up if we have a concern or see something that's not in line with our values and expectations. The first step is to speak with a line manager, or if that's not possible, contact your Human Resources (HR), Global Ethics and Compliance (GEC) or Legal representative.

You can also use the telephone, internet or postal reporting channels. These channels are managed independently of GSK, are available globally and allow for reports to be kept anonymous if the local laws and regulations permit it.

GSK treats all questions and issues confidentially, where possible, while investigating fairly, cooperating with governments and complying with legal obligations. When someone reports a concern in good faith, GSK will support that person.

Managers also have a duty to raise any concerns brought to their attention. Those who ignore violations, or who fail to detect or correct them, could face disciplinary action.

Remember, by speaking up and raising concerns, you are living our values and expectations and doing the right thing.

www.gsk.com/speakup



### **Option 1**

Speak to your manager



### Option 2

Raise a concern with local management, HR. GEC or Legal



### **Option 3**

Report confidentially online, by telephone or by email, or submit a report by post

#### Zero tolerance for retaliation

At GSK, you can report concerns without fear of reprisal. GSK prohibits retaliation against anyone who raises or reports concerns and will take disciplinary action up to and including dismissal (in accordance with local labour laws) of any employee who threatens or engages in retaliation or harassment of someone who has reported, or is considering reporting, a concern in good faith.

Similarly, we will report an agency worker who retaliates against anyone raising a report or concern to the worker's employment agency and terminate their assignment with GSK.

Our patients, our consumers, our industry Our company

Our colleagues

Our world

More information

Glossary



In the following sections, you'll find some principles that help each of us make the right choices and do the right thing in different situations.



# 1. Our patients, our consumers, our industry

How we protect patients and consumers and lead our industry.



### 2. Our company

What we do to safeguard our company and its assets.



### 3. Our colleagues

How we maintain our personal integrity and work with others.



### 4. Our world

How we engage with governments and groups, protect the environment and engage with the communities we work in.

Overview

Our patients, our consumers, our industry

Our company

3. Our colleagues 4. Our world More information

Glossary





Living our values and expectations

Our code of conduct

1.
Our patients,
our consumers,
our industry

Our company

Our colleagues

4. Our world More information

Glossary



# Our patients, our consumers, our industry

We do the right thing for our patients and consumers and strive for the highest quality. We work with our partners to improve healthcare and find new medicines and vaccines. Regardless of our role, we understand how our work affects patients and consumers.

### **Keywords to search** for on Connect GSK



- Medical governance
- Adverse event reporting
- Human safety information (HSI)
- Code of practice
- Reporting counterfeiting

### Code of practice documents

We have two code of practice documents – it's important to use the right one:

- Code of practice for promotional and non-promotional external interaction
- Consumer Healthcare code for promotion and scientific engagement

### **Protecting our patients and consumers**

We gain our patients' and consumers' trust by focusing on their needs. That means always thinking from their perspective. We put their safety first, and provide them with clear, up-to-date information. We promote our products ethically and only to permitted customers.

### Promotional activities that meet industry and GSK standards

Our promotional activities and materials conform to high ethical, medical and scientific standards. They are legal, industry-compliant and evidence based.

If local laws, industry codes or GSK policies set higher standards, we comply with the strictest requirement.

# Following the principles for non-promotional external interactions

We make sure our non-promotional activities are clearly distinct from the promotion of our products, never disguising or misusing our activities to influence healthcare professionals and others inappropriately.

### **Ensuring product information is accurate**

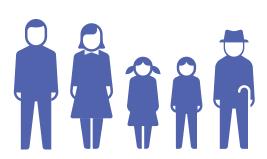
We provide complete, up-to-date and evidence-based product information to healthcare professionals and consumers, wherever they are in the world.

# Reporting a concern about a GSK product

Anyone hearing of any information regarding a side effect, adverse reaction or any other human safety concern on a GSK product, including possible lack of effectiveness, must report it to the Central Safety Department, or the local operating company medical department within 24 hours. Human safety information from clinical trials is reported as described in the study protocol.

#### **Preventing counterfeiting**

Counterfeit medicines and healthcare products pose a serious threat to the health and safety of our patients and consumers. They often lack the active ingredients to combat the illnesses they claim to treat and contain impurities that can actively cause harm. We are committed to protecting our patients and consumers from counterfeit products. We are all responsible for reporting any suspected counterfeiting of a GSK product.



Overview

1. Our patients, our consumers, our industry

Our company

3. Our colleagues 4. Our world More information

Glossary



### Conducting research safely

From product quality to sharing research data, we work to protect our patients and consumers and care for their wellbeing while advancing science.

### Keywords to search for on Connect GSK

- Ethical research
- Human samples
- Animal welfare
- Reporting counterfeiting
- Clinical trial disclosure



### Following all research protocols and standards

The safety and wellbeing of patients who volunteer to participate in our research trials is essential. We follow internal and external standards of quality and integrity for all our research programmes.

### Understanding transparency in our human research data

We may share expertise, resources, intellectual property and know-how with external researchers and the scientific community to help advance science as part of formal research collaborations. We also publicly disclose a range of information about human subject research studies and may share data with qualified researchers outside of a collaboration when we can protect patient confidentiality and ensure information is used only for valid scientific enquiry.

# Managing the quality of our products effectively

We strive to assure the safety, quality and efficacy of our products for our patients and consumers by ensuring that our procedures comply with Good Practice regulations.

Our Good Practice Procedures for Product Quality are documented in our Quality

Management System and apply everywhere we make, pack and distribute products.

### **Following Good Practices**

Protecting patients means using a range of Good Practice quality guidelines and standards throughout our business, on site, in the lab, in the clinic or in the office. We monitor and document our work thoroughly to ensure our records are correct and complete. We also monitor our computerised systems supporting these regulated processes.

Following these steps with precision ensures that each element of the process is traceable, accountable and ready for inspection. Adhering to these guidelines helps us meet regulatory requirements. More importantly, it means our products are of the right quality and that any potential risks to patients and consumers are minimised.

Overview

Our patients, our consumers, our industry 2. Our company

3. Our colleagues 4. Our world More information

Glossary



Darren Whitworth, Principal Development Scientist with Shaila Ali, Senior Development Scientist	
	2

Gifts or hospitality	13
Following the right financial procedures	13
Working with suppliers	13
Managing records properly	14
Handling personal information with care	14
Relevant, up-to-date records and information	14
Collecting competitive intelligence ethically	14
Data integrity	14
Safeguarding GSK assets	15
Using Technology Professionally	15
GSK devices for personal use	15
Returning GSK devices	15
We are all stewards of our reputation	15
Using social media	15



2. Our company

Living our values and expectations
Our code of conduct

Overview

Our patients, our consumers, our industry 2. Our company

Our colleagues

4. Our world More information

Glossary



### Our company

In this section, we look at how we protect our company, assets and data when we interact with our partners and suppliers.

### **Keywords to search** for on Connect GSK



- Conflicts of interest
- Meetings and catering
- Supplier diversity
- Grant of Authority
- Gifts, hospitality and entertainment

### Gifts or hospitality

Like any business, we sometimes give and accept gifts, hospitality or entertainment. In every case, we must consider if it is appropriate.

In some situations, gifts or hospitality could be misunderstood or perceived as a bribe. Before we offer or accept anything, we make sure it fits our policy and local requirements, is normal in business relationships and does not influence either party's decision making.

We do not offer or accept the gift or hospitality if it is linked to a sale or could be perceived as excessive or as a bribe.

#### Following the right financial procedures

GSK's financial, accounting and procurement controls are designed to ensure that we do not mislead investors, legislators, authorities and the public about financial aspects of our company.

When buying goods and services, we follow the correct procurement procedures and we have the appropriate approvals according to the Grant of Authority policy before committing to the purchase.

#### Working with suppliers

We rely on suppliers to enable us to do business. Working with Procurement, following set processes and using the approved buying channels helps make sure that we work with the suppliers who bring the most value to our organisation and who align with our standards.

We are committed to demonstrating inclusion and diversity within our supply base by ensuring we follow fair and non-discriminatory procurement practices, for example: considering and providing opportunities to small businesses and/or diverse-owned businesses where possible.

Overview

Our patients, our consumers, our industry Our company

Our colleagues

4. Our world More information

Glossary



### Managing records properly

The way we manage records could affect our business, our patients and consumers and our reputation. That means we should safeguard personal information, keep records up to date and gather market and competitor information in the right way.

### Handling personal information with care

We're all responsible for handling personal information (PI) with special care. GSK built its privacy foundation on nine Principles applicable globally: we only collect the minimum information necessary for our business goals; we tell the person exactly what we are doing with their information, how long we will keep it, and why we are collecting it; we destroy PI when we no longer need it for our business goals – just to name a few. We also have a duty to protect the personal information we collect and retain about people to ensure it is not misused, from research patient data to employee payroll information.

If you see or suspect unauthorised disclosure or misuse of PI, accidental or intentional, you must report it immediately via the Data Incident Reporting webform.

All employees, complementary workers and third-party suppliers who work with PI must complete relevant training.

### Relevant, up-to-date records and information

Good record keeping helps us protect PI and intellectual property, comply with legal, financial and regulatory requirements, and avoid unnecessary costs. However, we should not keep records and information longer than necessary to meet regulatory and business requirements.

# Collecting competitive intelligence ethically

As a company, we gather competitive intelligence ethically and in a way that meets all laws and regulations. We often use regulated specialist third-party suppliers to do this on our behalf. However, we should not seek to obtain or use information about our competitors' formulae, processes, patents, pending deals, or any other competitively sensitive information.

### **Data integrity**

We maintain data integrity by making sure that information is accurate and stored correctly. This is essential since much of our work relies on having robust data and information. As well as meeting legal and regulatory requirements, this means we have accurate information when making decisions about our products, our patients and our people.



### Keywords to search for on Connect GSK



- Privacy
- Data incident or breach
- Competition law
- Data integrity

Overview

Our patients, our consumers, our industry Our company

Our colleagues

4. Our world More information

Glossary





## **Keywords to search** for on Connect GSK

- Acceptable use of IT
- Safeguard GSK information
- Competition law
- Information security
- Social media guidelines
- Write right



The way we manage company assets, both tangible and intangible, is important. It includes our daily use of our technology (tech) systems and how we protect our information and intellectual property.

### **Using Technology Professionally**

We are all responsible for using tech resources appropriately and professionally at all times. We need to keep GSK's information and data secure from increasingly sophisticated cyber-attacks and technology mis-use. Therefore, we should always stay vigilant and use only company approved

tools to create and store GSK data. Nonapproved tools will have reduced access or can be even blocked from use without notice to employee. Illegal or inappropriate behaviour always puts GSK and personal information at risk and will generate appropriate disciplinary consequence.

### GSK devices for personal use

GSK Tech devices could be allowed for personal use, but this must be kept to a minimum, to manage only urgent needs, must not impact performance at work or generate unapproved or inappropriate cost for the company. Personal use of GSK resources is subject to additional local regulation and should always happen under managerial oversight or permission.

External exchange of data will be monitored and could be blocked. If you use your GSK device for personal use, any data held on the GSK asset is at your own risk as GSK can delete this content without your approval.

### **Returning GSK devices**

When someone leaves GSK they must return all GSK-owned equipment (including but not limited to Laptop, iPad, mobile phone and other company-owned assets) to their local Tech team. It is the Line Manager's responsibility to make sure all equipment is returned before, or on, the person's last day of work with GSK.

#### We are all stewards of our reputation

The way we communicate with the outside world and internally is crucial to building trust. All communications about our business interests are timely, accurate and reflect GSK's values and expectations, as well as following our policies, approval procedures and all applicable laws.

#### Using social media

As a GSK employee it's important you take care when interacting with content on social media to avoid risk to you and the company. We must never react to, comment on, share or post content that mentions or refers to GSK prescription products, R&D assets or competitor products. For all other content that impacts GSK's business (like disease awareness, consumer products, GSK receiving an award, third-party collaborations etc.) use good judgement when deciding to like, share or comment. If you do choose to comment on content approved for individual use, make it clear the views are your own. Only trained spokespeople can make comments on behalf of GSK. GSK policies on confidential information still apply to personal social media accounts.

Conversations can escalate quickly on social media. Pause and consider our values and write right principles before interacting with content. If you see content about GSK that you think is inaccurate, report it using our Speak Up channels.

Overview

Our patients, our consumers, our industry

Our company

Our colleagues

Our colleagues

4. Our world

Acting with individual integrity and courage

A healthy and safe workplace

More information

17

18

19

Glossary



Kamil Zahid, Senior Manager, Category Led Innovation

3. Our colleagues

Our patients, our consumers, our industry

Our company

Our colleagues

4. Our world More information



### Our colleagues

At GSK, we are driven by our purpose to make a difference to the lives of people around the world. We do everything we can to maintain the trust and respect of the organisations we work with and the communities in which we live and operate. This way, we protect the interests of our patients, consumers and our company.

# Acting with individual integrity and courage

Integrity and courage start with individual responsibility. If we always aim to do the right thing, act honestly, ethically and openly, and speak up if something doesn't feel right, we are acting with individual integrity and courage.

### Actively preventing fraud, bribery and all forms of corruption

Bribery is illegal no matter where in the world we work. It is up to us to speak up and report any suspected corruption and have transparent conversations to assess situations that could be open to fraud, bribery or corruption.

Our anti-bribery and corruption (ABAC) foundation principles (legitimacy of intent, transparency, proportionality, conflicts of interest or undue influence) help us detect and prevent bribery and corruption.

It is up to all of us to know what is expected of us to prevent bribery and corruption by complying with GSK policies and reporting any concerns. Leaders have a responsibility to ensure adequate assessment, mitigation and oversight of risks.



### Avoiding all conflicts of interest

Conflicts of interest arise when we may have loyalties and interests that compete with our responsibilities at GSK, for example, if a family member works for a competitor or third party we plan to engage with. We assess all our activities for potential conflicts and ensure that any actual, potential or perceivable conflicts are declared and resolved before we begin any work.

## **Keywords to search** for on Connect GSK



- Anti-bribery and corruption (ABAC)
- Conflicts of interest

Our patients, our consumers, our industry Our company

3. Our colleagues 4. Our world More information



### Dealing in shares

Some of us at GSK may have access to information through our work that is not publicly known, and which could affect GSK's share price. To trade in GSK shares when in possession of such knowledge is known as insider trading and is illegal.

# Competing in accordance with competition laws

GSK is committed to free and open competition. We follow competition laws wherever we operate and compete on the merits of our products and services.

#### Preparing for a crisis situation

GSK prepares for possible events to protect people and help ensure that our company can survive any disruptions, including man-made or natural disasters. Please keep your contact information up to date to ensure you, or a designated contact, can be reached in an emergency or crisis situation.

#### A healthy and safe workplace

Our purpose is to help people do more, feel better and live longer, including ourselves. That means creating healthy working environments that help us thrive.

Each one of us must take responsibility for following safe practices and life-saving rules. These rules are simple, standardised and easy to remember. We have clear expectations. Work cannot start until the Life Saving Rules are met. Work must be stopped if any of the Life Saving rules are broken. We must all live safely. Together.

#### Building quality into everything we do

Committing to quality means taking responsibility for improving our working practices, helping our patients and consumers, and maintaining their trust. We are passionate about quality and are always ready to learn from our mistakes as well as our successes. It is about striving to do the right thing, first time, every time and challenging ourselves to be the best we can be.



### Keywords to search for on Connect GSK



- Crisis and continuity
- Life saving rules
- Share dealing
- Competition law

Overview

Our patients, our consumers, our industry Our company

Our colleagues

4. Our world More information

Glossary





### Our colleagues

We should always show respect for our colleagues and the communities around us. Everyone has a part to play in creating a fair and inclusive work environment where everyone can thrive and be inspired to do their best work.

## **Keywords to search** for on Connect GSK

- Be you
- Pre-employment/Pre-engagement screening
- Complementary workers
- Managing third parties
- Equal and inclusive treatment



#### Treating people equally

All employees at GSK must ensure an equitable and inclusive culture free of discrimination. By doing so, we attract and retain the best people. We also aim to reflect the diversity and characteristics of the communities in which we operate and the people we serve.

#### A culture of respect

We do not tolerate violence, harassment, unwelcome, unreasonable, offensive or threatening behaviour of any kind. This includes any form of sexual harassment. Any such behaviour that affects an individual's dignity at work is not acceptable. This includes inappropriate behaviour using our online tools.

### Trusting each other

To work effectively, we need to have trust in each other. That can only happen if we take extra care to ensure that people working together do so in line with our values and expectations. This also applies to engagement of our complementary workforce and of our third parties, following the GSK Third Party Oversight framework.

Managers have a responsibility to appropriately handle employee concerns, reports and allegations, escalating them as needed.

### **Expressing our opinions**

We encourage open and honest conversations at GSK. It's important we're always guided by our values and expectations and think and act ethically with no room for misunderstanding. Global collaboration and communication tools, such as Workplace, allow us to share our views and experiences with colleagues across the world.

However, when we share our opinions, we must always be professional and respectful. Harassing, bullying, trolling, spamming discriminatory or otherwise inappropriate behaviour that violates GSK policies or local laws and regulations is not allowed.

#### Following our recruitment processes

We hire diverse people who align with our values and have the right qualifications and experience to work for us or on our behalf. That means we undertake pre-employment/pre-engagement screening for all employees and complementary workers before they are hired or contracted.

### **Complementary workers**

Complementary workers are an important asset to our business, and we benefit greatly from working with them.

We also expect those who work for or on behalf of GSK who are not employees to comply with the GSK code of conduct as a term of their engagement or contract with GSK, alongside local labour laws or regulations and the GSK Complementary Workforce Policy.

Those who manage complementary workers' assignments should follow relevant GSK policies as well as local laws.

Contents Overview More Glossary do more feel better Our company information Our patients, Our colleagues Our world our consumers, our industry Our commitment to human rights Mangal Maya, Meeting our challenging sustainability targets 21 Lymphatic Filariasis Patient Working with wider communities 4. Our world

live longer

Overview

Our patients, our consumers, our industry

Our company

Our colleagues

Our world

More information Glossary



### Our world

We are honest and transparent about what we do and how we do it. This improves how we collaborate with each other and enhances the way we are seen by the communities we work with. It demonstrates that we are open to challenge and discussion and want to improve the way we operate.

We are also mindful of our responsibilities. We care about our communities and the wider world and are committed to human rights and a sustainable approach in all that we do.

#### Keywords to search for on Connect GSK



- Environment, Health, Safety and Sustainability (EHS&S)
- Grants and donations
- Government officials
- Sanctions and export controls

### Our commitment to human rights

We have a responsibility to respect human rights wherever we do business.

That means striving to prevent, mitigate and remedy adverse impacts that our business activities or business relationships have on the human rights of our colleagues, patients and consumers, workers in our supply chain and those who live in the communities in which we operate.

### Meeting our challenging sustainability targets

If we all consider sustainability in our everyday decisions and ways of working, collectively we can make a difference. Our ambitious targets, to achieve net zero impact on climate and net positive impact on nature by 2030, will enable GSK to continue contributing significantly to planetary and human health now and in the future.

### Working with wider communities

### **Ensuring grants and donations** are appropriate

We support legitimate and worthy causes in the communities in which we operate. We also actively promote and support public health. Anyone involved in this area has a responsibility to check whether any grants and donations made are in line with our standards.

#### Making sure our work with governments is ethical

We work with governments and have a responsibility to abide by our standards and all applicable laws. Our anti-bribery and corruption (ABAC) Policy sets out aspects of ethics to follow when dealing with government and non-government organisations.

#### No political contributions

We do not make political contributions to any individual or organisation in any country in which we operate. This helps us to operate transparently - free from any political ties - and stay focused on putting patients and consumers first.

### Sanctions and export control laws

In some cases, sanctions and export control laws may restrict or prohibit us from doing business with certain countries, governments, government officials, entities and individuals.

It is each person's responsibility to understand any restrictions that apply to them and to the activities they carry out for GSK. This enables the company to follow the rules on engagement of third parties, financial transactions and the movement of our products, goods, materials, services, equipment, software and technology.

The GSK Sanctions Policy and associated standards outline the requirements which enable us to meet our sanctions compliance obligations.



### Where to find more information?



People working for or on behalf of GSK can log onto our written standards on Connect GSK to find all of GSK's corporate written standards. Use the keywords throughout this document to help your search.



Third parties may obtain more information via their GSK contact.



# Individual responsibility, collective purpose

It's up to all of us, every day, to keep GSK the kind of company we can all be proud of.

Thank you for helping to put our values and expectations at the heart of every action you make and decision you take on behalf of GSK.

### Speak up www.gsk.com/speakup



Contents Overview 1. Our patients, our consumers, our industry 2. Our company Our colleagues Our world Glossary



Term	Definition
ABAC	ABAC stands for anti-bribery and corruption. Read our ABAC policy to learn more about the situations that pose the highest risks.
Accountability (GSK expectation)	Accountability is about taking ownership, prioritising work that supports our strategy and delivering what we promise.
Adverse event reporting	An adverse event is any unexpected result associated with the use of a GSK product, whether or not you think it might be related to the product. It should be raised with the Central Safety Department within 24 hours of initial awareness via an online form.
AllTrials	We were the first pharmaceutical company to sign up to the AllTrials campaign for clinical trial transparency, supporting the registration of clinical trials and the disclosure of trial results and reports.
Code of conduct	Our code of conduct applies to employees and anyone who works for or on behalf of GSK. It helps us understand the values and expectations that guide our work. It describes the behaviours we all need to demonstrate to bring our values and expectations to life. Just as importantly, it shows us how living our values and expectations helps us fulfil our purpose of helping people do more, feel better and live longer. All our written standards and procedures are available on the Our written standards resource centre on Connect GSK.
Competition Law	Competition laws make sure that there is fair competition between businesses by making rules to control monopolies.
Complementary workers	People who work for or on behalf of GSK and are not employees. These include contractors, consultants and agency staff.
Conflicts of interest	A conflict of interest is a situation in which an individual has competing interests or loyalties; if you think you are, or might be, in such a situation, talk to your manager.
Data integrity	We maintain data integrity by making sure that information is accurate and stored correctly, which is essential, given much of our work relies on having robust data and information.
Courage (GSK expectation)	Courage means setting high ambitions, setting an accelerated pace, making decisions even when it's difficult and speaking up when we see an opportunity to improve.
Development (GSK expectation)	Development encourages us to bring the outside in and learn from others, and to ask for and give feedback, so we can continually grow as individuals, teams and to ask as an organisation.

Term	Definition
GSK values and expectations	Our values and expectations are part of our DNA. They are at the heart of everything we do. Together they help guide us to our goal to be one of the world's most innovative, best performing and trusted healthcare companies.
Integrity (GSK value)	Our value of integrity is about how we expect the highest ethical behaviours of ourselves and others.
Our written standards resource centre	Found on Connect GSK, this is a central repository of all of our written standards.
Patient focus (GSK value)	Our value of patient focus is about always doing the right thing for patients and consumers and striving for the highest quality.
Respect (GSK value)	Our value of respect means supporting colleagues and the communities around us, and embracing diversity and individuality, so we can all achieve great things.
Retaliation	Retaliation is when someone takes a negative action against a colleague for exercising their rights under employment law, e.g. speaking out. GSK has zero tolerance for retaliation.
Speaking up	Being accountable for concerns and issues that we spot by reporting or telling someone. It also includes recognising someone when they do something worthy of praise and sharing great ideas that benefit everyone.
Supplier	Suppliers are third parties who provide goods or services in return for the agreed upon compensation (traditionally fee for service basis).
Teamwork (GSK expectation)	Teamwork is about all of us working better together on aligned objectives, understanding how our work contributes to our Innovation, Performance and Trust and Culture priorities, encouraging diversity of thinking and inspiring and including each other.
Third party	A third party is any organisation or person that is not a GSK legal entity or employee, with which GSK has established a formal business relationship. This includes but is not exhaustive to suppliers, distributors, HCPs, licensors, etc.
Transparency (GSK value)	Our value of transparency helps us build trust with each other and with society by being honest and open about how and what we do.
Workplace	A Facebook-owned collaboration and communication platform used at GSK to facilitate business communication and collaboration amongst employees, complementary workers, and select third-party organisations.

