

# The Code Hub



*“We are all accountable to help make GSK a company that everyone can trust.*

*Our Code sets out the commitments GSK and everyone here makes so we can deliver on our ambition in the right way, bring our culture to life, and make GSK an exciting and inspiring place for us all to work.*

*So let’s commit to get ahead together.”*

**Emma Walmsley, CEO**

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Our policies and standards support the commitments we make in the Code. You can find them below with supporting resources. Other written standards specific to your role, location or business unit can be found in Veeva Quality Docs.

For further information and support you can reach out to your Legal, Compliance and HR representatives.

## Speak Up and concern management

Have you seen or heard something that didn't feel right? By Speaking Up and raising concerns you are doing the right thing.

At GSK, we encourage everyone to Speak Up about misconduct, possible breaches of our [Code](#), or other company policies or procedures, and suspected violations of laws and regulations without fear of reprisal.

1. Consider talking to your manager, HR, or legal and compliance representative.
2. If you can't or feel uncomfortable for any reason, you can use our [independently managed telephone, internet, or postal reporting channels](#).

## Adverse events

The people who take our medicines and vaccines are at the heart of everything we do. We collect Human Safety Information to help us evaluate the safe use of our products. We are all responsible for reporting any adverse events to protect the people we serve.

Everyone has an important role to play. If you become aware, inside or outside of work, of any information regarding human safety information or any other human safety concerns about a GSK product, including unexpected or possible lack of effectiveness it must be reported to [Global Safety, or the Local Operating Company \(LOC\) Medical Department within 24 hours](#).

## Anti bribery and corruption

We operate with zero tolerance for bribery and corruption.

It is everyone's duty to actively prevent fraud, bribery, and all forms of corruption. Our anti-bribery and corruption foundation principles: legitimacy of intent, transparency, proportionality, conflicts of interest or undue influence, help us detect and prevent bribery and corruption. If you have concerns, please [Speak Up](#).

## Artificial Intelligence

GSK expects its employees, complementary workers and third parties to use Artificial Intelligence (AI) in a legal, compliant, and responsible manner that aligns with the company objective to unite science, technology, and talent to get ahead of disease together. Responsible use of AI considers the ethical, societal and governance impacts across all Business Units and Functions. Responsible use of AI further facilitates sound decisions in AI design and development for business purposes.

The AI Policy defines our AI Principles to provide clear guidance on how to manage and mitigate potential risks associated with AI. Adherence to these Principles is intended to ensure that all GSK apply technology ethically, safely, and in alignment with GSK's culture, values, and social responsibility.

## Competition law

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.

If you interact with competitors, are involved in tenders, or make decisions on pricing GSK products you must follow competition law.

## Conflicts of interest

We expect everyone to be aware of and report any conflicts of interest.

Conflicts of interest arise when we have loyalties and interests that compete with our responsibilities at GSK. An actual, potential, or perceivable conflict can carry bribery and corruption, competition law and other reputational risks.

If you believe you have a conflict of interest, please speak to your manager and then complete a [COI form](#) and upload to your Workday.

## Counterfeit products

We are committed to protecting patients and consumers from counterfeit products. We are all responsible for reporting any suspected counterfeiting of a GSK product.

If you discover a counterfeit product, please log a consumer complaint to the email address provided on the pack with details of where and when the product was seen or purchased or email: [counterfeits@gsk.com](mailto:counterfeits@gsk.com), if no email address on the pack is provided.

## Crisis situations

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.

## Cyber security

We need to keep GSK's information and data secure from increasingly sophisticated cyber-attacks and technology misuse.

We are all responsible for

- safeguarding access to, and appropriate use of any tech resources for GSK business purposes and use of non-GSK tech resources on GSK devices.
- protecting GSK data that contains information on patients, customers, and employees.

Always stay vigilant and only use company approved tools to create and store GSK data.

Report cyber security incidents to [cstd@gsk.com](mailto:cstd@gsk.com) or via the cyber security incident and concern report form.

## Data integrity

Every activity performed by GSK as a company relies on having robust data to underpin our work and to ultimately ensure product quality and patient safety.

We maintain data integrity by making sure that information is accurate and stored correctly. 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.

If you suspect any violations, please report through the [Speak Up channels](#).

## Environment

We have ambitious targets, to achieve net zero impact on climate and net positive impact on nature by 2030, which will enable GSK to continue contributing significantly to planetary and human health now and in the future.

If we all consider sustainability in our everyday decisions and ways of working, collectively we can make a difference.

## Ethical and responsible research

The safety and wellbeing of people who volunteer to participate in our research trials is essential. We strive to minimise risks to humans involved in research and follow Good Clinical Practice for our clinical trials. We assure the safety, quality, and efficacy of our products by complying with Good Practice regulations.

## Financial grants of authority

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.

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.

## Gifts, hospitality, and entertainment

In restricted circumstances GSK employees may and accept gifts, hospitality, or entertainment. We must always consider if it is appropriate and legal. In some situations, gifts or hospitality could be misunderstood or perceived as a bribe. Following the principles, the limits and approval processes in our policy helps us manage this risk.

## Grants and donations

Before giving a grant or a donation you have a responsibility to ensure that they are subject to internal approval and are in line with [our standards](#).

We support legitimate and worthy causes in the communities in which we operate. We also actively promote and support public health.

## Privacy and protection of information

All employees, complementary workers and third-party suppliers who work with personal information (PI) must complete relevant training and ensure they follow our standards. 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](#).

## **Human rights**

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

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

## **International sanctions**

Sanctions are measures that may restrict or prohibit us from engaging or dealing with certain countries, governments, industry sectors, entities, and people. GSK is committed to complying with all applicable sanctions requirements and has zero tolerance for breaches of its sanction's obligations. A breach of financial sanctions is a criminal offence which would result in serious consequences for GSK.

## **Promotional and scientific engagement**

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

Our scientific engagement must be non-promotional and distinct from the promotion of our products, never disguising or misusing our activities to influence healthcare professionals and others inappropriately.

It is important that everyone at GSK understands the differences between promotion and scientific engagement, regardless of where we sit in the business.

## **Responsible care and use of animals**

GSK is fully committed to high standards of humane care and treatment for our animals. Our internal company-wide policy defines expected practices for the care, welfare, and treatment of research animals, irrespective of whether our studies are conducted in GSK facilities or by partner institutions.

GSK is committed to the replacement, reduction, and refinement of animal studies (3Rs). We are actively engaged in efforts to develop and validate experimental methods that can provide alternatives to the use of animals in research.

## **Responsible use of technology**

The way we use GSK assets, both tangible and intangible, is important. We are all responsible for always using tech resources appropriately and professionally to avoid risk to you and the company.

## **Risk management and internal control**

As a responsible company we manage risks effectively and take action if things go wrong. Our company-wide risk management and internal control policy defines the requirements, roles and responsibilities for the management and governance of risks and internal controls, and highlights expected risk management behaviours aligned to The Code.

## **Share dealing**

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.

## **Social media**

The way we communicate with the outside world and internally at GSK is crucial to building trust. It's important you take care when interacting with content on social media to avoid risk to you and the company.

## **Training**

Mandatory training programmes protect you and GSK by helping individuals understand the significant risks facing the company and the actions they need to take. Expected learning programmes apply where a specific skill, process or behaviour is required in a role.

## **Travel, expenses, and meetings**

Everyone has a duty to ensure we spend GSK's money wisely, in line with the defined approval limits and policies. In acting responsibly, we underpin our culture, employee safety, wellbeing and transparency.

## **Working with third parties**

GSK strives to only conduct business with third parties that commit to maintaining high ethical standards and operate responsibly. We rely on our suppliers and distributor relationships to achieve successful business all around the world. Consistent standards and behaviours help to build trust and long-term relationships with our stakeholders.

It is important to understand the qualifications and associations of third parties with whom we want to work. Therefore, we conduct third party due diligence and ongoing risk management including management monitoring and oversight.

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

## **Workplace equality and inclusivity**

At GSK we commit to create an inclusive and safe workplace, where people can be themselves and thrive together.

GSK strives to provide an inclusive culture free of discrimination. By doing so, we attract and retain the best people. We should always show respect for our colleagues and the communities around us.

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. If you witness or experience any of these, report it using the [Speak Up channels](#).

## **Workplace safety**

Creating healthy working environments that help us achieve our best is essential to our success. We must all work safely, together.

Each one of us must take responsibility for following safe practices and our [life-saving rules](#). These rules are simple, standardised, and easy to remember. The rules provide clear expectations to ensure we all go home safely.

## **Write Right**

We need to write things down. No business can succeed without effective written communication. We need to make sure that we've acted ethically, and our written records accurately reflect what we've done, so there's no room for misinterpretation or misunderstanding.

If you write or read something and do not know if it follows our Write Right principles, seek advice. Talk with your manager first and, if needed, consult your group's legal counsel.