

POL-GSK-007 - Anti-Bribery and Corruption

GSK Corporate POL_150091 (v10.0)

Why do we have this Policy?

What does this policy cover?

This Policy covers GSK's general principles and standards on anti-bribery and corruption (ABAC) and maintenance of business documentation and financial records. It reinforces our zero tolerance towards all forms of corruption and our commitment to maintaining accurate records of our business dealings. This policy aligns with the ABAC laws from the countries where GSK operates and is based on our corporate values and our four ABAC Foundational Principles: legitimacy of intent, no undue influence or conflict of interest, transparency and proportionality (for more information on these principles visit the [ABAC website](#)).

This Policy does not stop us doing legitimate business in the context of promoting products, executing contracts, exchanging scientific and medical information or paying official published fees for the services or goods provided by governments.

Why should you read this?

GSK *Staff* and *third parties* acting on our behalf are required to understand and comply with our ABAC principles and standards, as well as with all relevant international and domestic legislation. All of us are responsible for preventing any instance of bribery or corruption and for reporting any concern or suspicion so we can identify the risks and conduct any required investigations.

If you breach this Policy you may also be breaking the law and could face disciplinary action that could lead to you losing your job, being fined and/or sentenced to prison.

What do you need to know?

Anti-bribery and corruption

- We do not, directly or through a third party, promise, offer, make, authorise, solicit or accept any financial or other advantage, to or from anyone to obtain or retain business or secure an improper advantage in the conduct of business. This rule applies regardless of whether they are government officials or work in a private sector entity. Financial or other advantage covers anything of value, including cash, gifts, services, job offers, loans, travel expenses, entertainment or hospitality.
- We prohibit all facilitation payments as they are bribes. These payments are unofficial, improper, small payments or gifts offered or made to *government officials* to secure or expedite a routine or necessary action to which we are legally entitled.
- GSK leadership and managers lead by example, ensuring GSK *Staff* and relevant third parties are aware of the ethical significance and critical role of our ABAC principles and standards.
- We perform a comprehensive risk assessment to determine the company's exposure to bribery and corruption risk. The risk assessment is reviewed and updated regularly to reflect changes in our risk profile.
- The ABAC principles and standards established in this Policy are developed and supported by a number of periodically reviewed corporate written standards (click here – [see Page 3](#)) which constitute our ABAC controls, policies and procedures.
- GSK provides mandatory periodic ABAC training to GSK *Staff* and relevant third parties in accordance with their roles, responsibilities and the risks they face. It is everyone's responsibility to complete such training in the specified timelines.
- We perform risk-based due diligence prior to engaging any third party or undertaking a business development transaction and ensure appropriate contractual clauses and monitoring controls are put in place as described in the [ABAC Third Party and Business Development frameworks](#).

- Our dedicated [ABAC website](#) and regular communications ensure ABAC awareness and support are available across the company.

Maintenance of business documentation and financial records

- All our financial books and records accurately reflect and disclose the business rationale, purpose, substance and legality of all our local and cross-border transactions, payments and expenses.
- We do not induce third parties to make incomplete or misleading entries in their records.
- We are particularly vigilant of transactions with unusual terms or features, such as use of cash or use of shell companies or entities based in tax havens or high risk countries.

We ensure we make or receive payments in the country in which the entity or person with which we transact is resident and in the currency agreed in the contract. We do not make or receive payments to or from unrelated third parties or countries. Any exceptions to these payment rules require specific written approval by a

What do you need to know?

member of the Finance Leadership Team supported by written advice from the relevant GSK Legal Operations Group responsible for the relevant *business unit*.

- We provide further details of our transactions in response to legitimate requests –e.g. internal or external auditors, GSK *Staff* investigating allegations of misconduct, regulators and *government officials*.

If you have concerns

If you hear, see or learn about anything that breaches this policy, you should report it to GSK Legal, your business unit or LOC Compliance Officer or to Global Finance,

If you are unsure whether what you are doing or plan to do comply with this policy, you should immediately contact your line manager in the first instance.

If you want advice on how to interpret and implement anything in this policy you must contact the Legal Operations attorney, the Compliance Officer or the Finance person responsible for your business unit.



To find your local Speak Up integrity line number or to report online, please visit: www.gsk.com/integrity

Definitions of terms in italics in this document can be found in the *GSK Glossary*

Administration

Governance Board Approval:	Corporate Executive Team (CET) / ABAC Governance Board
Governance Approval Date:	15-DEC-2015
Owner:	Neil Falkingham, Head, Global Risk Management Office, GEC
Author:	Gonzalo Guzman, Programme Manager, ABAC CoE
Legal Approver:	Steven Rix, Assistant General Counsel
History:	This v.10 policy supersedes and replaces <i>POL-GSK-007, Policy on Preventing Corrupt Practices and Maintaining Standards of Documentation, v.9</i>
	Changes since last revision The main changes are: <ul style="list-style-type: none">– Title changes– The bribery prohibition clause has been redrafted to make it more encompassing and aligned with legal definitions.– The policy aligns the ABAC Programme with the ICF and well-known external ABAC compliance practices. .– The 'standards of documentation' section has been reviewed. The SVP/Legal exception for offshore payments has been clarified.
Previous Versions:	23-DEC-2013: POL-GSK-007 v09 01-JUL-2012 POL-GSK-007 v08 05-JUL-2011: POL-GSK-007 v07

See footer for Document Effective Date

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