

GlaxoSmithKline
Corporate Policy
POL-GSK-007 v04

**PREVENTING CORRUPT PRACTICES AND
MAINTAINING STANDARDS OF DOCUMENTATION**

Effective Date: 21 May, 2003

1. PURPOSE

To ensure that:

- All GlaxoSmithKline dealings with third parties, particularly governments and government personnel are carried out in compliance with all relevant laws and regulations, including the UK Anti-Terrorism Crime and Security Act 2001, the US Foreign Corrupt Practices Act, the US Sarbanes-Oxley Act and with the standards of integrity required for all GSK business (see POL-GSK-001 – Code of Conduct)
- The books and records of GSK and all its operating units and affiliates are accurate and sufficiently clear, detailed and timely, to record the true nature of GSK's business, its transactions and liabilities.

2. SCOPE

This policy applies to all GSK employees worldwide.

3. POLICY

3.1. Preventing Corrupt Practices

- 3.1.1. Except as set out under Sections 3.1.2 below, no payments or inducements may be made, offered, or authorised to political candidates, legislators, political parties and party officials, or government officials or employees, whether local or national, including officials and employees of government owned enterprises and of public international organisations. This prohibition also applies to GSK dealings with employees or agents of companies or organisations in the private sector. Similarly, no payments (other than promotional payments consistent with GSK policies) may be made to any person to accomplish indirectly any payment or inducement which is prohibited by the preceding sentence. In this context, 'payments' refer to anything of value, including gifts, money, services and employment offers.

3.1.2. Bona fide political contributions are not prohibited by this policy where it is desirable and legal to make them in order to support the long term best interests of GSK and/or of industry generally in that country. (See also POL-GSK-302 – [Political Contributions](#).)

3.2. **Standards of Documentation**

3.2.1. No undisclosed or unrecorded fund or asset shall be established for any purpose.

3.2.2. No payment shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.

3.2.3. No false, artificial, intentionally misleading or incomplete entry shall be made, or data established for any reason, and no employee shall engage in any arrangement that results in the creation of such entry or data.

3.2.4. The standards set out in Section 3.2.3 above shall also apply to oral or written explanations to company auditors and investigators, and government or court officials or others having legitimate grounds to request responses and explanations.

3.2.5. Payment for services should usually be made in the country in which the services were performed and to the person performing the services. Reasons for exceptions to this practice should be supported by legal and business considerations and fully documented. Possible reasons include remuneration of expatriate personnel or payment to a party when the party performing the service is outside the country or has its centre of operations elsewhere. All such arrangements that vary from the usual practice must first be approved by the Chief Financial Officer or the relevant business unit head.

3.2.6. Employees having custody of books and records shall be responsible for their security and ensure that no improper or unauthorised alterations or disclosures occur.

3.2.7. Any employee having information or knowledge of any unrecorded fund or asset or any prohibited act shall promptly report such matter to the Corporate Finance Department, GSK Legal or a Compliance Officer.

4. **RESPONSIBILITY**

Senior management of GSK, in particular GSK Finance and GSK Legal, and managers of GSK Business Units shall be responsible for enforcing compliance with this policy,

including ensuring that employees responsible to them are aware of this policy and the need for compliance.

5. DEFINITIONS

None

6. ADMINISTRATION

6.1. **Approval:** GSK Corporate Executive Team

6.2. **Sponsors:** GSK Chief Financial Officer; GSK General Counsel

6.3. **Author:** Head, Legal Operations International

6.4. **Date:** 25 July 2002

6.5. **History:** New GSK policy. Supersedes GW 7.1; SBCC-04 and SBCC-09; **POL-GSK-007-v01:** Approved 12 June, 2001; Effective 21 June, 2001; **POL-GSK-007 v02:** Approved 12 September 2001; Effective 24 September, 2001; **POL-GSK-007 v03** Effective 26 June 2002; **POL-GSK-007 v04:** Approved and effective 21 May, 2003.

7. APPENDICES

None