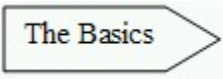
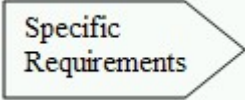
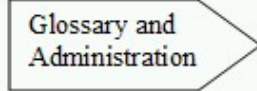


GSK Policy		Title: POLITICAL CONTRIBUTIONS
Official Short Title: Political Contributions Policy		
Key Points		
<ul style="list-style-type: none"> With effect from 1 January 2009 GSK will not make political contributions in any country in which it operates. 		
Why do we have this policy? This policy is intended to clarify this corporate decision and to explain how it impacts upon GSK disclosure requirements in the Annual Report, as well as PAC contributions in the US.		
What does this policy say?		Who in GSK has general obligations under this policy?
	<ol style="list-style-type: none"> Purpose Definition Scope 	All GSK Staff <input checked="" type="checkbox"/>
	<ol style="list-style-type: none"> Responsibilities European Requirements International Requirements (i.e. ex-Europe and ex-US) United States Requirements Communication of Issues 	Who in GSK has specific obligations under this policy? <ul style="list-style-type: none"> Audit, Compliance, & Quality <input checked="" type="checkbox"/> Communications <input type="checkbox"/> Govt. & External Affairs <input checked="" type="checkbox"/> Finance <input type="checkbox"/> Global Procurement <input type="checkbox"/> HR <input type="checkbox"/> IT <input type="checkbox"/> Legal <input checked="" type="checkbox"/> Manufacturing & Supply <input type="checkbox"/> Marketing, Sales & Support <input type="checkbox"/> Medical <input type="checkbox"/> Research / Development <input type="checkbox"/> Supervisors & Management <input type="checkbox"/> Senior Management <input checked="" type="checkbox"/> Corporate Secretariat <input checked="" type="checkbox"/>
	Glossary Administration Waivers Related Documents	Contacts: Corporate Ethics & Compliance 1-866-GSK Ethics

The Basics

1. Purpose

With effect from 1 January 2009 GSK has adopted a global policy ending the provision of political contributions in any market in which the company operates. This includes financial and in-kind contributions made by the company.

The policy expands on the GSK policy introduced in 2001 ending contributions to EU political organisations. However, in order to protect GSK from any inadvertent violation of the UK law (where political contributions are defined very broadly) GSK will continue to seek shareholder approval for political contributions within the EU. However, our policy of not making any contributions to EU political organisations remains unchanged.

Contributions by the GSK PAC in the US are unaffected by this decision.

2. Definition

Political contributions are defined as any gift, subscription, loan, advance or deposit of money or anything of value made to a candidate or political party for the purpose of influencing any election for office or subsequent period in office.

3. Scope

This policy applies to all GSK Staff world-wide, within all sectors, regions, areas and functions.

The Specifics

4. Responsibilities

- 4.1. The Company will disclose in the Annual Report our policy of not making any political contributions. In the event that an inadvertent donation is made, details will be disclosed in the Annual Report.
- 4.2. The Company will include in the Annual Report an explanatory remark on contributions in the US from the GSK Political Action Committee.
- 4.3. Corporate Secretariat will ensure that the Annual Report contains the disclosure set out in 4.1 and 4.2 as required by law.
- 4.4. GSK managers who violate this policy are subject to disciplinary action up to and including separation.

5. European Requirements

- 5.1. UK law requires prior shareholder approval of political contributions from anywhere in the world to EU political parties and independent election candidates. Shareholders have been advised that the company does not intend to make political contributions within the EU.

Political contributions are defined broadly under UK law and arguably include contributions to “Think Tanks”, funding of meetings with politicians and other activities which would not normally be considered to amount to political contributions. Expenditure in respect of any activities on the part of the company which could be deemed to influence voters during a referendum within the EU is also included. To protect the company from any inadvertent violation of the law, GSK plc’s shareholders have approved funds within strict aggregate financial limits to cover certain categories of political contributions which could possibly be defined as political contributions under the UK’s definition of a political donation or expenditure. Nonetheless, the company does not intend to make political contributions in the EU.

- 5.2. Before committing to any contribution/donation that might possibly be considered to be a political donation under the UK law’s broad definition, operating companies or other units proposing to make political contributions to European based organisations must notify and seek approval from Corporate Secretariat and Government Affairs, European and Corporate. GSK plc’s Directors are personally liable to repay with interest any unapproved EU political contributions. They are also liable to pay damages in respect of any loss or damage sustained by the company.

6. International Requirements (i.e. ex-Europe and ex-US)

- 6.1. Before making any contributions in relation to any EU organisation, International operating companies must first check with Corporate Secretariat and Government Affairs, European and Corporate, that the organisation is not covered by the Political Parties, Elections and Referendums Act 2000.
- 6.2. Political contributions to local/non-EU political organisations are not permitted under this policy.

7. United States Requirements

- 7.1. Before making any contributions in relation to any EU organisation, GSK US operating companies must first check with Corporate Secretariat and Government Affairs, European and Corporate that the organisation is not covered by the Political Parties, Elections and Referendums Act 2000.
- 7.2. In the US, GSK political contributions to candidates for state office (while permitted under US law) are not permitted under this policy.
- 7.3. In accordance with the Federal Election Campaign Act, the US operating company has authorized the establishment of a “separate segregated fund”, called a Political Action Committee or PAC, to facilitate voluntary political contributions by employees. Contributions from the fund are determined by a governing board of 20 GSK PAC members who serve across divisions of the US operating unit in accordance with the PAC Code of Conduct. There may be no coercion in any form with respect to participation in the GSK PAC.

8. Communication of Issues

8.1. For clarification around any element of this Policy, contact the VP, Government Affairs, European and Corporate. Any concerns about violations or potential conflicts of interest associated with this policy should be raised with a Compliance Officer.

Glossary & Administration

Glossary

Political Action Committee (PAC): A corporate or labour based political committee that solicits voluntary contributions from employees and shareholders for a "separate segregated fund." This fund is used by the PAC to make contributions or expenditures in connection with federal elections. Federal election laws in the U.S. prohibit corporations from using its general treasury funds to make contributions and expenditures to support federal candidates and other federal committees. However, the laws do permit corporations to spend general treasury funds to pay for the costs of establishing and running a PAC.

Administration

Approval:	GSK Corporate Executive Team (CET)
Owner:	GSK Corporate Compliance Officer
Author:	VP, European and Corporate Government Affairs,
Approval Date:	15-DEC-2008
Effective Date	04-NOV-2010
History:	04-NOV-2010: POL-GSK-302 v03 – administrative update to add related documents section with document links on connectGSK intranet 01-JAN-2009: POL-GSK-302 v02 – update to new format and policy changes 09-JAN-2002: POL-GSK-302 v01 – New GSK Corporate Policy

Waivers

Subject to the constraints of the requirements of the applicable legislation or regulations, any requirement of this Corporate Policy may be waived conditionally on a case-by-case basis in exceptional circumstances with written approval from the CEO. All requests for exemptions/exemptions should be directed to Corporate Ethics & Compliance (CEC).



Once approved, these exceptions will be recorded by CEC and posted on the Corporate Ethics & Compliance web community for visibility. The approved exception author/sponsor is required to notify all relevant GSK employees, contractors and third parties of the granted exception.

Related Documents

[GSK Code of Conduct, POL-GSK-001](#)

[GSK Standards of Conduct, STD-GSK-001](#)

[Preventing Corrupt Practices & Maintaining Standards of Documentation POL-GSK-007](#)

[SOP on Engaging with Non-HCP Government Officials SOP-GSK-007](#)

[Employee Guide to Business Conduct](#)

[Corporate Control Documents Index on connectGSK](#)