

An Introduction to CORPORATE ETHICS AND COMPLIANCE



GlaxoSmithKline



The Right Choice.

YOUR ETHICAL COMPASS

Whenever you are faced with a decision that is difficult to resolve, ask yourself the following questions:

- Is it legal and ethical?
- Is it consistent with GSK policy and the Code of Conduct?
- Am I being honest, fair, and trustworthy?
- Is it consistent with GSK's Values?
- Who could be affected - customers, patients, research subjects or colleagues?
- Could I explain it to family and friends?
- How would it be reported on the news?
- ***If you are not sure, ASK***

An Introduction to Corporate Ethics & Compliance for GlaxoSmithKline Staff

A Message from Our Chief Executive Officer

Dear Colleague:

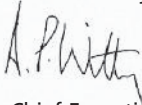
There is no higher priority for me as CEO of GlaxoSmithKline than the ethical conduct of our employees and our company. We *only* exist to improve the lives of patients, so every decision we take, every action, every conversation we hold, has to have this at its heart and as its sole purpose.

Ethical conduct is not something we do when we first join the company, or when we are asked about it, or when we have time to think about it. It should be what we do every minute of every day. In short, it should be in our DNA. There should be no company anywhere that has higher standards than GlaxoSmithKline. Our ethical conduct should be something that truly differentiates us from other companies.

Why is this so important to me? Because we have to recognize that we exist because Society allows us to exist. And Society has ever increasing expectations on companies like GlaxoSmithKline. We should not only be meeting those expectations, we should be exceeding them. Ethical standards are not static – they increase and evolve with time. And we need to get ahead of the curve. In short, conducting GSK's business with complete honesty, fairness, openness and integrity plays a vital role in ensuring our continued growth and success and helps us achieve our global mission to improve the quality of human life by enabling people to do more, feel better and live longer.

To sustain this trust and confidence, each employee must take personal responsibility for abiding by the *Code of Conduct* and the *GSK Employee Guide to Business Conduct*. Integrity and good judgement must be the cornerstones for all the decisions we make. The first step in meeting this commitment means understanding our values and what we stand for as well as the policies and procedures that are there to underpin these values. The second step is to live and breathe, not only by the letter, but also by the spirit of, these fundamental values and principles.

Andrew Witty



Chief Executive Officer,
GlaxoSmithKline

It is vital to the continued success of GlaxoSmithKline that we conduct our business with honesty and integrity and in compliance with all applicable legal and regulatory requirements. The Code of Conduct sets out the fundamental standards to be followed by staff in their everyday actions on behalf of the Company and seeks to promote honest and ethical conduct. Further guidance on the Company's standards in specific areas will be provided through related corporate policies and guidelines.

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

All GlaxoSmithKline Staff must:

- Conduct the Company's business with honesty and integrity and in a professional manner that protects the Company's good public image and reputation.
- Build relationships with customers, vendors and fellow employees based on trust and treat every individual with respect and dignity in the conduct of Company business.
- Become familiar with and comply with legal requirements and Company policy and procedures.
- Avoid any activities that could involve or lead to involvement in any unlawful practice or any harm to the Company's reputation or image.
- Avoid actual or potential conflicts of interest with the Company, or the appearance thereof, in all transactions.
- Provide accurate and reliable information in records submitted, safeguard the Company's confidential information, and respect the confidential information of other parties with whom the Company does business or competes.
- Promptly report to the company, where local laws allow, any violations of law, ethical principles or Company policies that come to the employee's attention; and cooperate fully in any audit, inquiry, review or investigation by the Company.
- Provide the Company's External Auditor with access at all times to the Company's records and accounts (in whatever form they are held) and provide additional information as requested by the External Auditor. If such requested information is legally privileged the employee must contact the Legal Department before responding to the request.

All employees must uphold these standards in the conduct of Company business and the Company must handle, in a manner consistent with these standards and related policies, all actual and apparent conflicts of interest between personal and professional relationships and all other matters governed by this Code and such related policies. If a decision about a particular action is not covered specifically by this Code or related corporate policies, employees are required to seek guidance from their supervisor or appropriate internal resources, such as the Legal Department, Human Resources or Compliance Officers.

Senior management should be a role-model for these standards by visibly demonstrating support and by regularly encouraging adherence by managers. Managers should ensure all their employees receive guidance, training and communication on ethical behavior and legal compliance relevant to their duties for the Company.

Failure by any employee to comply with this or any GSK policy will subject employees, including supervisors who ignore prohibited conduct, or have knowledge of the conduct and fail to correct it, to disciplinary action up to and including separation from employment with the Company in accordance with local labour laws.

When in doubt as to the correct action to take, ask the following question: "Would I feel comfortable in explaining this action to my family or close friends or seeing my action reported on the front page of the local newspaper?" The Company is best served when each employee's answer to this question is an unqualified, "Yes."



CORPORATE ETHICS & COMPLIANCE

Our mission is to provide oversight and guidance to support the Code of Conduct, the *Employee Guide to Business Conduct* and GSK's commitment to high standards of integrity and legal compliance by promoting:

- Ethical behavior and compliance with all laws and regulations
- Corporate responsibility at all levels
- Effective compliance systems

Our ultimate success depends on each employee's commitment to our Code of Conduct and GSK policies.

Contacting Corporate Ethics & Compliance

Simon Bicknell is GSK's Corporate Compliance Officer. His office is located at GSK House in Brentford, UK. His contact information is as follows:

SIMON BICKNELL
SVP, Governance, Ethics & Assurance
Simon.M.Bicknell@gsk.com
44 20 8047 4501

Assisting the Corporate Compliance Officer are Compliance Officers assigned to each of the major sectors:

Biologicals

SIGRID WILLAME
Sigrid.X.Willame@gskbio.com
32 10 85 4949

Consumer Healthcare

JIM DAWSON
James.M.Dawson@gsk.com
1-215-751-4938

Core Business Services (CBS)

ANGELA RODIN
Angela.R.Rodin@gsk.com
1-919-483-8581

Corporate

JOSEPH E. HENRY
Joseph.E.Henry@gsk.com
1-215-751-3781

Emerging Markets/ Asia Pacific & Japan

SABINA SUDAN
Sabina.S.Sudan@gsk.com
65 6232 5264

Global Manufacturing & Supply

GUY WINGATE
Guy.AS.Wingate@gsk.com
44 1833 69 3330

Global Privacy

MINA MEHTA
Mina.D.Mehta@gsk.com
44 20 8047 6201

North American Pharma

MICHAEL SHAW
Michael.L.Shaw@gsk.com
1-215-751-7337

Pharma – Europe

GERARD GENEEN
Gerard.R.Geneen@gsk.com
44 20 8047 2365

Research & Development

JOE NEAR
Joseph.C.Near@gsk.com
1-919-315-6831

You may also send your concern(s) directly to the Corporate Compliance Officer at this address:



Corporate Compliance Officer
PO Box 58572
Philadelphia, PA 19102
(This is a secure, off-site P.O. Box)

FREQUENTLY ASKED QUESTIONS

What is the purpose of the Integrity Helpline and Confidential Reporting Lines?

The Integrity Helpline and Confidential Reporting Lines are confidential reporting channels to Corporate Ethics & Compliance where employees, contractors, and vendors can raise concerns related to potential violations of GSK corporate policies or legal compliance. These lines are most often used as a source of information regarding corporate and business policies. Reporting confidentiality is respected in line with legal obligations, and GSK has a strong non-retaliation protection policy for individuals who report concerns in good faith.

Where do I find the numbers for the Integrity Helpline and Confidential Reporting Lines?

The toll-free number in the US for the Integrity Helpline is **1-866-GSK-ETHICS** (1-866-475-3844). Outside the US, please use the appropriate country Confidential Reporting Lines. These numbers are available on the Corporate Ethics & Compliance internal web community.

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What is my responsibility for reporting concerns about violations of company policy?

GSK employees are responsible for conducting themselves in an ethical manner, and where the local laws allow, promptly reporting any suspected instances of possible misconduct. This includes the potential misconduct of fellow employees, consultants, and contract or temporary workers. Ideally, you should raise concerns before problems develop. By stepping forward and raising concerns, you are fulfilling one of your responsibilities as an employee. You are also doing the right thing.

Where should I report concerns or suspected violations of GSK's policies?

Normally you should first discuss a concern with your immediate supervisor or the line manager who is closest to the situation and best able to help. If you are uncomfortable doing this, you should report to someone in an appropriate GSK function, such as Internal Audit; Human Resources; Corporate Security and Investigations; Corporate Environment, Health and Safety; Legal; Finance Director; or Corporate Ethics & Compliance.

Where should I report fraud?

Employees are required to report any suspected or actual fraud, regardless of materiality, to the local Finance Director or equivalent (unless suspected of involvement) and to Corporate Security and Investigations or to Corporate Ethics & Compliance.

*How can I order a copy of the **Employee Guide To Business Conduct**?*

The *Employee Guide to Business Conduct*, which summarizes GSK's corporate policies, may be found on the Corporate Ethics & Compliance internal web community.

Where can I find GSK corporate policies and guidance?

GSK Corporate Policies and Control Documents can be found on the connectGSK intranet home page link, or through the Corporate Ethics & Compliance web community menu.

GSK GLOBAL CONFIDENTIAL REPORTING LINES

Country Confidential Reporting Lines will be available via local free phone numbers or through UK Geographical Access numbers. Please use the following country numbers and access codes to raise your concerns.

U.S. Toll Free Integrity Helpline: 1-866-GSK-Ethics (1-866-475-3844)

Country	Free Phone number	Access Code	Geographical Number
Argentina	0800 666 0077	47506	+44 121 713 8672
Australia	1 800 230731	47501	+44 121 713 7000
Austria	00800 281 161	47548	+44 121 713 6897
Belgium	0800 80384	47526	+44 121 713 7041
Brazil	0800 891 9677	47507	+44 121 713 8649
Bulgaria	00800 115 4437	47550	+44 121 713 7079
Canada	1 8777 475 307	47508	+44 121 713 7054
Chile	123 0020 8419	47509	+44 121 713 8672
China	10800 440 0163 Telecom	47502	+44 121 713 7047
China	10800 744 0163 Netcom	47502	+44 121 713 7047
Colombia	01800 944 0693	47510	+44 121 713 8672
Costa Rica	0800 0440 030	47511	+44 121 713 8672
Croatia	0800 222512	47551	+44 121 713 8697
Czech Republic	800 14 2650	47552	+44 121 713 7075
Denmark	80 88 58 12	47553	+44 121 713 7050
Egypt	0800 00 00111	47528	+44 121 713 8652
Germany	0800 180 0094	47513	+44 121 713 6897
Greece	00800 441 45224	47555	+44 121 713 7060
Finland	0800 914 544	47554	+44 121 713 8657
Hong Kong	800 90 8258	47514	+44 121 713 7056
Hungary	06 800 17858	47556	+44 121 713 7074
India	000800 440 1102	47530	+44 121 713 7000
Indonesia	00180 344 1476	47531	+44 121 713 8658
Ireland	1800 946823	47532	+44 121 713 7000
Israel	180 944 0644	47557	+44 121 713 8692
Italy	800 920034	47503	+44 121 713 7043
Jamaica	1 800 988 0237	47515	+44 121 713 7000
Japan	00531 44 0046	47533	+44 121 713 7077
Korea	00308 44 0118	47516	+44 121 713 7069
Latvia	8000 2946	47559	+44 121 713 8690
Lithuania	8800 30678	47560	+44 121 713 8689
Malaysia	1 800 81 2300	47535	+44 121 713 7072
Mexico	01800 123 0179	47504	+44 121 713 8672
Netherlands	08000 249798	47538	+44 121 713 7053
New Zealand	0800 49172	47537	+44 121 713 7000
Nigeria	08007 4468685	47539	+44 121 713 7042
Norway	800 1 3743	47561	+44 121 713 7061

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GSK GLOBAL CONFIDENTIAL REPORTING LINES

Country	Free Phone number	Access Code	Geographical Number
Pakistan	00800 900 44003	47540	+44 121 713 8627
Panama	001800 876 1903	47517	+44 121 713 8672
Peru	0800 52768	47519	+44 121 713 8672
Philippines	1800 1441 0214	47520	+44 121 713 8673
Poland	00800 4411 617	47541	+44 121 713 7051
Portugal	00800 10005647	47564	+44 121 713 7059
Romania	0800 894784	47565	+44 121 713 7081
Russia	810 800 2258 1044	47566	+44 121 713 7038
Saudi Arabia	800 844 2733	47544	+44 121 713 8694
Singapore	800 4481 398	47543	+44 121 713 7000
Slovakia	8000 04619	47567	+44 121 713 7076
Slovenia	0800 80278	47568	+44 121 713 8684
Spain	900 811498	47505	+44 121 713 7044
South Africa	0800 99 1396	47521	+44 121 713 7000
Sri Lanka	2422173 - (use 011 prefix if outside Colombo)	47563	+44 121 713 8680
Switzerland	0800 56 1580	47570	+44 121 713 7053
Taiwan	00801 44 4292	47522	+44 121 713 7068
Thailand	001800 441 0657	47545	+44 121 713 8681
UAE	8000 4414 669	47547	+44 121 713 8694
UK	0808 100 5689	47500	+44 121 713 7000
Uruguay	0004 0440 15	47523	+44 121 713 8672
Venezuela	0800 100 5429	47524	+44 121 713 8672

Countries where freephone access is not currently available. These countries will have access to a UK geographical number. Please note: International charges will apply for using these numbers.

Country	Access Code	Geographical Number
Algeria	47525	+44 121 713 7042
Bangladesh	47549	+44 121 713 7000
Cote D'Ivoire	47527	+44 121 713 7042
Ecuador	47512	+44 121 713 8672
Kazakhstan	47558	+44 121 713 8691
Kenya	47534	+44 121 713 7042
Morocco	47536	+44 121 713 7042
Serbia & Montenegro	47562	+44 121 713 8696
Trinidad	47572	+44 121 713 7000
Turkey	47546	+44 121 713 7065
Ukraine	47573	+44 121 713 7067
Vietnam	47571	+44 121 713 8699