Living our values
Our Code of Conduct
Together, we form a science-led, global healthcare company focused on our mission to help people do more, feel better, live longer. In delivering this mission, we hold ourselves – and each other – accountable to our promise to put our values at the heart of every decision we make. No excuses. No exceptions.

- We focus on the individual, doing what is right for patients and consumers
- We work with our partners and customers to improve healthcare and find new medicines and vaccines
- We support and inspire our colleagues to help them be the best they can be and to achieve great things
- We listen to the world outside of GSK and use our science and scale to take actions that advance healthcare
- We are a successful business that acts responsibly with integrity and transparency, living up to the standards that are rightly expected of us

We are a community of over 100,000 people in more than 115 countries. We aim to build a culture where all our people are empowered and united by our values and a common set of expectations.

Our Code of Conduct embodies the Spirit of GSK and brings together a number of company policy principles. It provides a working guide for the way in which we should apply our values across all our business practices and working styles. All our policies and procedures are available on the Code of Conduct and company policies resource centre.
“There is no higher priority for me, as CEO of GSK, than the values-based conduct of our employees and our company. I want to lead a business where every single employee feels proud of their achievements, because they work hard, they achieve the unimaginable, and they do it the right way.

In the last few years, we have focused on bringing to life our values of transparency, respect for people, integrity and patient focus and being thoughtful about what they really mean at a human level. I know that you share my desire to work for and build a business that has a spirit, a heart; a business that is guided by more than just money.

At GSK, we want to ensure that everything we do is guided by our commitment to our values and our commitment to being in compliance with the regulations within which we have to operate. The foundations of these commitments are laid out in our Code of Conduct and each employee must take personal responsibility for abiding by our Code.

Building a successful business means we do not compromise our values. We should always do the right thing for patients and consumers, regulators and society as a whole. I firmly believe that, working together, we can achieve what we want to achieve, doing it the right way.”

Andrew Witty CEO
Our Code of Conduct is not negotiable. It is absolutely essential to how we achieve success.

We are required to read, understand and abide by our Code and take the time to understand the policies that are referenced within it. We are expected to act as role models, ensuring that everything we do is in line with our values. All our employees – leaders and individuals alike – are assessed and rewarded on the way and extent to which we live our values and meet our expectations.

Our commitment to our values and our Code of Conduct is supported by our Global Ethics and Compliance team. This team is responsible for fostering a positive, ethical work environment as well as providing oversight and guidance to ensure compliance with applicable laws, regulations, and company policies.

Line managers, Legal Counsel, HR and Compliance Officers are available to advise, guide and answer questions.

Our obligation to abide by country laws and regulatory requirements

We operate under many legal and regulatory requirements which protect patients and consumers around the world. As a global company, this means the laws and regulations in one country can impact business activities in another. For example, our Corporate Integrity Agreement (CIA) with the US government has stringent obligations that reinforce US healthcare laws and programme requirements associated with engaging US healthcare professionals and activities anywhere across the globe. These US requirements are explained in detail on our GSK Code of Conduct and company policies resource centre. We are expected to seek guidance from a Compliance Officer or Legal Counsel if questions arise on the impact and relevance of different countries’ laws on our local activities.

No matter where we operate in the world, we must live by our values, be aware of, and abide by, the legal standards and regulatory requirements applicable to our business.

Diversity and Human Rights

We strive to create a working environment that reflects the diversity and characteristics of the communities and the customers we serve, and which is free of harassment, discrimination and bullying.

We have a responsibility to uphold human rights within our own operations but must also be aware of and support the rights of people who are impacted more broadly by our business. GSK’s potential for impacting human rights is far reaching, encompassing areas such as access to medicines, patient safety, conduct of clinical trials, and using third party suppliers. This means, for example, we must only work with suppliers who share our commitment to operating in a responsible and ethical manner with respect to labour rights, health and safety of their employees and their suppliers.

We are all responsible for understanding the wider implications of our operations and ensuring that GSK is not responsible for, or associated with, any human rights breaches.

The kind of company we are is down to each of us. By putting our values at the heart of every decision we make, we help people do more, feel better, live longer.

Q: What is the best approach to take if I am faced with a difficult ethical issue?

A: Simply ask yourself these questions:

- Is it legal?
- Is it consistent with GSK’s values?
- Is it consistent with GSK’s policies?
- Could I justify it to my family, friends and co-workers?
- Would I be comfortable if it appeared in a newspaper?
Our responsibility to ask questions and Speak Up

We must hold ourselves and each other accountable for abiding by our Code of Conduct. Furthermore, we are empowered, and required, to promptly raise concerns of possible misconduct, potential conflicts, or known breaches of this Code and company expectations. Suspected violations of country laws and regulations where we operate must also be reported. This includes the potential misconduct of employees, complementary workers, consultants, vendors, and partners with whom we jointly do business (including co-promote entities). Ideally, concerns should be raised before problems develop.

Our Speak Up culture and procedures encourage everyone to raise concerns about potential unethical or illegal conduct, and assure confidentiality and protection from retaliation, retribution, or any form of harassment to those reporting such concerns.

You are protected

GSK encourages everyone to report concerns without fear of reprisal. In line with our value of respect for people, we treat all questions or concerns about compliance in a confidential manner, even if the person speaking up identifies themself. We do so in a manner that is consistent with the need to investigate fairly, cooperate with governments and comply with legal obligations, including discovery in litigation.

Disciplinary action up to and including termination of employment, in accordance with local labour laws, will be taken against anyone who threatens or engages in retaliation or harassment of any person who has reported, or is considering reporting, a concern in good faith.

Reporting of misconduct procedure
SOP-GSK-003

Safeguarding people who report unethical or illegal conduct
SOP-GSK-015

Disciplinary action

Our policies, including those described in this Code of Conduct, apply to employees and complementary workers at all levels of the company, regardless of role. Failure to comply with the Code of Conduct, GSK policies, or applicable legal and regulatory requirements will result in disciplinary action up to and including termination of employment. This also applies to managers who ignore violations or fail to detect and/or correct them. Complementary workforce disciplinary issues will be dealt with via their employer’s disciplinary codes.

Managers and Human Resources are responsible for overseeing appropriate disciplinary actions in line with company discipline standards, as allowed by local labour laws. Breaches of law may also result in civil or criminal penalties for the violator.

Speak Up integrity channels

Confidential Speak Up integrity line phone numbers are available on the Code of Conduct and company policies resource centre or externally on gsk.com.

Issues can also be raised online at www.gsk.com/integrity or by regular mail at our secure, off-site post office boxes. Mail addresses are available on the websites noted above.

An independent company manages these reporting lines. All calls are logged through their central system to ensure integrity of the programme.

By speaking up and raising concerns, we are living our GSK values, and doing the right thing. This protects our licence to operate.
Our Code of Conduct

We focus on the individual, doing what is right for patients and consumers. We work with our partners and customers to improve healthcare and find new medicines and vaccines.

We can only gain our customers’ respect and trust by building relationships with them. We must take the time to look at issues through their eyes, engage them in meaningful conversations and really listen to what they have to say.

How can we make this happen?

- Only promote our products within the approved label
- Focus on the patient’s and consumer’s needs in research
- Ensure patient/consumer safety is paramount
- Ensure product quality and reliability of supply

Be patient focused

*Put patients and consumers first*
Protect our patients and consumers

Always put patient and consumer safety first

Patient and consumer safety is always our top priority, and we are committed to the highest standards of medical governance. Our Chief Medical Officers have authority on matters of human safety and accountabilities for the medical governance systems in our company. These systems include safety evaluation of our products, the management of human safety, conduct and disclosure of clinical research, and interactions with external communities about science and medicine and promotional practices.

Any concerns about any aspects relating to the safety of any GSK product – no matter how minor the concerns may appear to be – must be reported to our relevant company safety departments. This is known as adverse event reporting. We are committed to identifying and managing human safety information (HSI) we receive to help safeguard anyone who takes our products or takes part in our clinical trials. HSI is any information relating to human health or wellbeing following use of a GSK product.

Q: As a leader, what can I do to ensure patient safety?

A: The answer depends on your role or the roles of your team members. You must ensure the effective handling of reported safety issues as required by POL-GSK-400, and ensure adherence to the key procedures that underpin the policy (Corporate procedures SOP-GSKF-400, SOP-GSKF-006, SOP-GSKF-012 and R&D SOP_S4834).

Please report an adverse event to the relevant Safety Department OR local operating company medical department within 24 hours of initial awareness. Report an adverse event with a GSK product or device (including Stiefel products and devices) to the Named Safety Contact for your country.

“When starting each working day, I feel very motivated that I can contribute to improve the life of at least one patient that day.”

Hazem GSK United Arab Emirates

Follow our scientific engagement principles when having scientific conversations

We are committed to the highest standards and principles when interacting and engaging in scientific/medical dialogue with outside communities in order to advance scientific and medical understanding. This includes the communication and discussion of scientific data to enable the appropriate development and use of our products, understanding the management of disease, and improving patient care.

This interaction and exchange of information (called scientific engagement) is clearly distinct from promotion, which is defined as any activity undertaken by the company (or on its behalf) that conveys information in order to advertise or promote the prescription, supply, sale, distribution or use of GSK products. There are legal and reputational risks for the company if scientific engagement activities are, or are perceived to be, promoting our products or inappropriately influencing healthcare professionals and others.
Protect our patients and consumers continued

Ensure commercial practices adhere to industry and internal GSK expectations

All pharmaceutical marketing and promotional activities, and supporting promotional materials by GSK companies worldwide must conform to high ethical, medical and scientific standards. They must be based on valid scientific evidence and comply with all applicable laws, regulations and industry marketing codes.

We are committed to ensuring that, when interacting with healthcare professionals and patients, all GSK workforces involved in marketing or promotional activities will follow the GSK global Code of Practice for promotion and customer interactions. This Code of Practice sets the GSK minimum standard. If local laws, industry codes or GSK policies set higher standards, the strictest requirement must always be applied. Be aware that additional requirements may also apply if healthcare professionals are government employees.

Ensure accuracy of product information

We are committed to providing accurate, evidence-based product information (PI) to healthcare professionals, and patients or consumers to inform them of the safe and effective use of our products. PI includes the uses (or indications) for the product, and essential safety information and instructions for use. It is based on a thorough evaluation of available medical and scientific data on the product.

We will only make our products available in countries where they are medically appropriate, and our General Managers are accountable for making this determination in consultation with the local Medical Director. Both global and country level PI must comply with these requirements.

Validate GxP computerised systems

We are committed to ensuring that computerised systems that support processes subject to GxP regulations are validated in proportion to their potential risk to patient safety, product quality, and integrity of GxP regulated records. GxP business areas have overall responsibility for ensuring their GxP systems are appropriately validated, used and maintained in a compliant manner, and ready for inspection by regulatory authorities. This includes GxP systems used or provided by third party suppliers on our behalf.

GxP requirements are the collective body of regulations governing the development, manufacturing, distribution, licensing, marketing and surveillance of pharmaceutical, biologic, consumer healthcare and medical device products.
Our Code of Conduct

Conduct ethical research

Follow all research protocols and controls

We are committed to conducting human subject research to the highest ethical, medical and scientific standards in accordance with the principles of respect for people, patient benefit and justice. This includes interventional and non-interventional studies, and studies that use data from previous studies.

For human subject research that evaluates medicines, we post protocol and result summaries on internet registers. We also post the protocols and clinical study reports with the removal of personally identifiable information. We aim to publish these studies as manuscripts in peer-reviewed journals. Additional publications are progressed where they provide important scientific knowledge or are relevant for patient care.

Ensure product quality

Ensure an effective quality management system

We are committed to safeguarding the people who use our products, so it is of paramount importance that we have an effective quality management system (QMS). The QMS ensures we comply with global and local regulations, assure product safety, quality and efficacy, maintain a state of control over our products and processes and support continuous improvement. This includes but is not limited to current Good Manufacturing Practices.

The scope of the implementation of the QMS in each business area will depend on the processes they employ and the level of impact and risk those processes have on the design, development, manufacture, control, and supply of products that people use.

Be alert to potential counterfeiting

We are committed to protecting our patients and consumers from counterfeit GSK healthcare products. These can be dangerous to our consumers, our reputation and to public health generally. They can put people’s lives at risk and present a serious risk to our business.

Any suspected counterfeiting of pharmaceutical, vaccine or consumer healthcare products must be reported to Legal: Global Trademarks (LGTM) and Corporate Security and Investigations (CSI) using our Suspect Product Market Sighting Form; this electronic reporting tool enables the company to automatically distribute details of counterfeit products to appropriate parties.

Conduct and public disclosure of clinical trials and their results
POL-GSKF-408
Investigator sponsored studies
POL-GSKF-411
Human biological samples policy
POL-GSKF-410
Care, welfare and treatment of animals in research
POL-GSKF-403

Quality management systems policy
POL-GSKF-514

Anti-counterfeiting policy
POL-GSK-511
Corporate security and investigations intranet site

POL-GSKF-408
POL-GSKF-411
POL-GSKF-410
POL-GSKF-403
POL-GSKF-514
POL-GSK-511
Act with integrity

Do the right thing

We are a successful business that acts responsibly with integrity and transparency, living up to the standards that are rightly expected of us.

How can we make this happen?

– Always act legally and fairly, within the spirit of all laws, regulations and policies
– Do not offer illegal inducements to anyone
– Speak up if something doesn’t feel right or doesn’t align with our values
– Safeguard company assets and information
– Make realistic commitments and keep our promises
– Do the right thing for GSK, not just for ourselves or our team
– Look for principles, not loopholes
– Seek guidance when in any doubt
Act with individual integrity

Have zero tolerance for bribery and corrupt practices

We are committed to meeting the highest ethical standards in the way we do business. All of us — the company, employees and anyone acting on our behalf — must obey company policies and all laws in any country where we operate, including specific anti-corruption laws.

GSK has zero tolerance towards bribery and corruption. We will not make, offer to make, or authorise payment to a third party (e.g. sales agent, distributor or intermediary) with knowledge that all or part of the payment will be offered or given to any individual to secure an improper advantage, obtain or retain business.

We are also committed to making sure all records of our business dealings are totally accurate. This means we must keep accurate records of our business dealings so we can always trace why and how we make or receive payments and for what reason.

“Doing the right thing without having to be told to do it — because you know in your heart and mind, it’s the right thing to do.”

Lorri GSK North America Pharmaceuticals

Prevent and detect fraud

We must demonstrate a culture of honesty and integrity in all that we do, and preventing and detecting fraud is a priority for all of us. Leaders must not ignore or accept minor unethical practices as this could create a perception that controls are lax and can be exploited. Leaders must be role models and demonstrate consistency between their words and actions.

Q: What sorts of actions constitute fraud?

A: The legal definition of fraud varies from country to country, but generally it is seen to be the dishonest obtaining or diversion of company property or services, including company funds or other tangible assets, by making any misrepresentation or false statement with a view to personal gain or obtaining a benefit for another party, or to cause loss to the company.
Act with individual integrity

Be free of conflicts of interest

We must all be free from actual or potential conflicts of interest. A conflict of interest occurs whenever the prospect of direct or indirect personal gain may influence or appear to influence our judgement or actions while conducting GSK business.

Q: What if somebody thinks there is a conflict of interest even though one might not exist?

A: It is important to avoid not only an actual conflict of interest, but also the appearance of a conflict in the performance of your job. You must promptly disclose to a manager, supervisor or a Compliance Officer any situation that may involve a potential or actual conflict of interest and ask for appropriate guidance before taking any action (in accordance with local privacy laws).

Be mindful of entertainment, gifts, and hospitality

Provision and acceptance of entertainment, gifts and hospitality are often part of business relationships or cultural practices, and are permitted to and from external organisations or individuals as long as they are ethical and aligned with GSK’s Values, related to GSK business, infrequent, low in value, legal, and customary in a business relationship (not just for staff’s personal wellbeing or use). Guidance should be sought from your Compliance Officer.

It is important that we do not accept or provide inappropriate gifts, entertainment or hospitality as these actions can create conflicts of interest, or at least raise the question that our judgement has been improperly influenced. We must also follow requirements on travel and meeting expenses so they are not seen as inconsistent with our values.
Manage operations

Manage risk effectively

We are committed to having effective risk management systems (including frameworks and processes) to ensure the significant risks we face have been appropriately identified, assessed, treated, monitored, and reported.

This is an integral part of good management practice and will help us to protect patient safety, people, the environment, company assets and reputation; and achieve our business objectives, safeguard shareholder investment and ensure we comply with legal requirements.

Be secure

We should feel safe wherever we work. It is also essential we have well designed security plans to protect our property, products and other assets. Everyone who works at GSK, whether you are an employee or complementary worker, must follow a consistent approach to security issues across all company operations. CSI is responsible for setting minimum standards and procedures and for providing advice on all security issues.

Build a resilient business

Through effective crisis management and business continuity planning we are committed to providing for the health and safety of people, minimising damage and impact to the company, and keeping our operations going after a natural or man-made disaster, or a health emergency.

Before a disruption occurs we must identify key areas of responsibility and have established clear communication channels, to be able to respond quickly to affected workers and patients, minimise the period of disruption, and resume normal working conditions as soon as possible.

Follow internal finance, accounting and procurement regulations

Our financial and accounting controls are designed to ensure that we do not mislead investors, legislators, authorities or the public about financial aspects of the company. We are all responsible for following our policies and legal, financial and accounting regulations.

We buy a large volume of goods and services annually, and all purchases must, prior to commitment of payment, be approved by a GSK employee with the appropriate transaction spend limit and proper grant of authority (GOA).

We will ensure financial statements are reviewed by independent auditors and other third party reviewers as appropriate, and that we are completely open and transparent in our dealings with them. We must also show full cooperation and openness when dealing with GSK internal audit and assurance teams.

We must all be diligent in not passing on insider information to any other person or encourage another person to deal in GSK securities on the basis of non-public information, even if you do not profit directly from the information.
Safeguard assets and information

Safeguard company information

We are committed to safeguarding GSK information and all information entrusted to us.

Information is one of our most valuable assets. We must safeguard proprietary, confidential, and highly confidential information, plus personally identifiable (PII) and sensitive personally identifiable information (SPII) at all times to prevent harm to GSK, our shareholders, and individuals or other third parties that have trusted us with their information.

Safeguard technology resources

Everyone who uses GSK’s computer systems plays a role in ensuring that they use them in a secure and appropriate manner in keeping with the values and spirit of GSK. These systems are critical to GSK’s success.

We are all responsible for using IT resources in a professional manner at all times and must never use them to engage in illegal, offensive or inappropriate behaviour.

We are personally responsible for safeguarding the access to, and appropriate use of, our company’s IT resources. Complementary workers and third parties under our direction must also comply with this requirement.

Safeguard personally identifiable information

We are committed to exercising the highest standards of integrity in dealing with and protecting personal data. PII can identify or reasonably be used to identify someone. We must protect PII that people entrust to us so they are not harmed by its misuse, and we must comply with all applicable laws for its protection under our Binding Corporate Rules.

Manage records and information

As a company, we are committed to properly managing the life cycle of our records and information to protect our intellectual property; comply with legal, financial and regulatory requirements; and avoid unnecessary costs. We may not retain any records or information for longer than necessary to meet our business needs and any legal or regulatory retention requirements.

Every day, we create and receive large amounts of information. It is our responsibility to ensure that we retain proper records and information – not only will this protect our intellectual property, it will also make sure that we comply with legal, financial and regulatory requirements.

Company records and information should be retained no longer than the period of time necessary to meet all legal and regulatory retention requirements and business needs. See the Global Records Retention Schedule for details.
Safeguard assets and information continued

Gather competitive intelligence appropriately and safeguard GSK confidential information

We must make sure competitive intelligence is gathered ethically and in compliance with all laws and regulations that protect others’ confidential and proprietary information. This means we cannot mislead or pressure the employees and business partners of a competitor or other third party to disclose this type of information; in addition, no GSK employees should interview or hire a competitor’s employees or third parties for this purpose. We are also responsible for ensuring that any vendors we use to gather competitive intelligence act in accordance with this Code, and we should have contracts in place with third party vendors that require this. If GSK employees are innocent recipients of information about or from a competitor that they believe is confidential or was obtained inappropriately, they should not use this information and should contact their Legal Counsel about how to proceed.

Never talk about information such as pricing, company plans or profits with competitors, and remember that our agents and business partners are not allowed to do so either. Infringement of competition laws can result in financial penalties and possible imprisonment for individuals, so seek the advice and involvement of GSK Legal if you are in doubt.

What is our policy on protecting GSK Information and assets such as IT resources?

It is vital to safeguard access to, and appropriate use of, GSK’s information and IT resources. We are changing our ways of working, including more sharing and collaboration with outside parties. Use of mobile and personal devices and rising cyber crime all increase the likelihood of incidents of loss of GSK information. Electronic communications are not necessarily private, and records of all our communications may be made and used for a variety of reasons. GSK may also monitor them to ensure that company policies on computer use are being followed. We can only protect our information and assets with a combination of technical controls and by ensuring we have an educated, vigilant workforce where protection of information is part of our culture and values.

If you know of the possible misuse or misappropriation of GSK information or a GSK asset, you should notify your manager, a Compliance Officer, Legal Counsel, CSI, or use the GSK confidential Speak Up reporting lines or website.
We support and inspire our colleagues to help them be the best they can be and to achieve great things. We listen to the world outside of GSK and use our science and scale to take actions that advance healthcare.

How can we make this happen?

- Ensure our workplace is safe and free of harassment and bullying
- Actively seek, value and draw on the differing knowledge, perspectives, experience and styles present in our global community
- Create an atmosphere of trust, in which concerns can be fully raised

Demonstrate respect for people

*Inspire each other to achieve great things*
Support our people and society

Perform at our best

We must all exhibit high standards of personal and professional conduct to ensure a productive and safe work environment. Our goal is to attract, develop and retain the best people by treating everyone on an equal and inclusive basis. We strive to create a working environment that reflects the diversity and characteristics of the communities in which we operate and the customers we serve, and which is free of harassment, discrimination and bullying. Harassment and discrimination will not be permitted and any issues raised will be resolved without fear of reprisal.

Q: Who is responsible for delivering our commitment to an inclusive and diverse workforce?

A: We must all take personal responsibility for upholding GSK’s standards for equal and inclusive treatment of people, with professional courtesy, dignity and respect. This means valuing them as individuals as well as complying with country-specific laws and regulations where we operate. All employees are responsible for supporting our commitment to creating an environment where every employee feels valued and respected.

You must immediately report to management, or Human Resources, any incidents that are inconsistent with this policy so that the company can take appropriate action.
Support our people and society continued

Build a healthy, high performing workforce and safe working environment

We are committed to safeguarding people, the environment and our assets through excellence in environment, health, safety and sustainability management (EHS&S). Successfully implementing these practices in each business area depends on the business processes we employ, and we have set challenging sustainability targets for fulfilling this commitment. By embedding a strong EHS&S culture throughout the business we can maintain a healthy, resilient and high-performing workforce, and support the health and wellbeing of our people in a proactive and non-discriminatory way.

Q: Is it sufficient for our operations to comply with local legal requirements on EHS?

A: No. All operations must comply with local legal requirements as well as our Global Environment, Health and Safety (EHS) standards. In order to help us continuously improve our health, wellbeing and resilience in a sustainable manner, all leaders are required to integrate health principles and practices into Human Resources strategy and business processes. This enables us to help people continuously improve their health, wellbeing, and resilience in a sustainable manner.

We must familiarise ourselves with, and follow, the EHS policies, procedures and guidelines that apply to our work. Any health or safety concerns or work-related injuries or illnesses must be reported immediately to management.

Performing at our best is vital to our mission and being under the influence of alcohol or drugs, or using medication, may diminish the ability to do this. Use of illicit drugs, controlled substances or alcohol, or the misuse of medications, may also affect your safety and the safety of co-workers, and impact our business operations.

If you believe that someone you work with is impaired due to alcohol, drugs or other substances, or that somebody is using alcohol or illegal substances on company property, you must notify a member of management, HR, Employee Health Management or the Speak Up reporting lines or website.

“The engine of GSK is its people. Respect is the heart of the power that drives the engine forward.”

Rodger GSK research and development United Kingdom
Support our people and society continued

Perform proper pre-employment and pre-engagement screenings

We are committed to screening all employees and complementary workers before they are hired or engaged. These screenings help protect our people, assets, intellectual property and products by ensuring the people we hire have the qualifications and the experience required for their positions.

We have a duty to self disclose any information that might preclude our involvement in GSK business operations. This includes restrictions preventing involvement in government programmes (e.g. US Federal Programmes debarment), lack of a relevant licence required to perform a particular role and meet legal requirements, or loss of any necessary clearance to access secure areas containing sensitive, valuable assets. In compliance with legal requirements, GSK reserves the right to screen its workforce for ineligibility.

Adhere to complementary workforce regulations

We are committed to the highest standards of workforce management in accordance with our values. A well defined and well managed complementary workforce (consisting of Agency Workers, Statement of Work Workers and Outsourced Workers), is a key company asset and we benefit greatly from the effective use of these resources. All policies that set out standards for managing this workforce, including the responsibilities of hiring managers and the requirements for complying with local legislation, must be followed.
We are honest and transparent about what we do, how we do it and the challenges we face. We are open to challenge, to discussion and to improving how we work to reflect our values.

How can we make this happen?

- Think whether the actions we are about to take will improve people’s trust in GSK
- Assume others can see our actions
- Ensure what we say or write is fair and honest, and not misleading or incomplete
- Provide timely, relevant, and accurate information
- Demonstrate conviction and take ownership
- Escalate important information promptly
Build trust with society

Be a steward of GSK’s reputation

We must coordinate and manage the way we communicate with external audiences, and internally among ourselves. We are committed to protecting our reputation and the trust that people place in us. These are precious assets and vital to our success.

Communications by people can have a significant impact on the company. We must ensure all communications about the company’s business interests are timely, accurate, consistent, and reflect our values. We must also ensure communications comply with our policies, our approval and authorisation procedures, and all applicable laws. All communications should reflect Write Right principles to minimise the potential of future misinterpretation.

Q: Can I discuss company matters on social media?

A: We must never make any public posting of confidential information related to any aspect of our business on the internet. This includes social networking media of all types as well as any other internet-based forum including, but not restricted to, chat rooms, bulletin boards, blogs, wikis and so on.

Manage all grants and donations appropriately

We are committed to supporting legitimate and worthy causes in the communities in which we operate as well as promoting and supporting public health. We have policies that ensure all awards of grants and donations, in cash and in kind, are in line with our mission, ethical standards and values. Through proper governance of grants and donations, we protect our company’s reputation with internal and external stakeholders.

We are committed to the charitable donation of products based on humanitarian needs and other factors as part of our commitment to responsible business, including donations in emergency and disaster situations. These donations must be made through responsible management practices in accordance with company processes and legal requirements, and in line with World Health Organization requirements.

Adhere to GSK’s ban on political contributions

Political contributions are defined as any gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing any election for office or any period in office. They include in-kind contributions (goods, commodities or services instead of money). GSK does not make political contributions to any individual or organisation in any country in which we operate. If our people engage in the political process, it must be in their own time, and with their own resources.
Ensure ethical government interactions

GSK does significant business with many governments in many countries and there are special laws that apply to these interactions, particularly when these entities are our customers. These can include regulations relating to pricing and rebates, as well as anti-kickback laws to prohibit potential business inducements. In addition, there are limitations on gifts, entertainment, gratuities or other remuneration which may be offered to government employees and agents involved in procurement and public policy processes. We must comply with all applicable laws and regulatory agency requirements as outlined in business area policies and procedures, and we must ensure that all our interactions with governments are ethical and appropriate.

“Total disclosure has become a way of life in Agbara. We share success and failure with equal candour.”

Henry GSK Nigeria

Be aware of international business boundaries

We are committed to obeying all applicable sanctions and export controls. These are rules that many countries and international bodies impose that restrict or prohibit us from doing business with certain countries, governments, entities and people.

We must ensure that we comply with restrictions on the movement of our funds, products, goods, materials, services, software and technology, and on our dealings with our people. Certain GSK employees cannot have any interaction or involvement with particular restricted markets at all, requiring that they must withdraw themselves from any dealings with such markets (known as recusal).
Playing our part
The company we are is down to each of us

Our expectations

The GSK expectations guide what we do to deliver our strategy.

- Set direction and inspire
- Work across boundaries
- Release energy
- Develop capability and talent
- Drive performance
- Live our values

Our industry is highly regulated and scrutinised.

Poor decisions or unintended missteps can result in significant financial and reputational penalties. At the same time, we have a vastly rewarding work environment in which we can make a real difference in the world.

All of us shape GSK’s reputation. That’s why our values are not optional. In every decision we make, we must put our patients and consumers first, act with integrity, treat people with respect and operate with transparency. In addition, we must abide by the spirit – not just the letter – of the necessary standards required by law.

This is the company we want to be.