

Code for Dealing in GSK Securities POL-GSK-008

GSK Corporate POL_87129 (10.0)

Why do we have this Policy?

What does this policy cover?

This policy outlines principles and expectations when dealing in GSK securities or securities of any company with which GSK does business.

Why should you read this?

This policy applies to all GSK employees and complementary workers that may deal in GSK or other related companies' securities.

What do you need to know?

Under the Criminal Justice Act of 1993, insider dealing is a serious criminal offence, and the UK financial regulator can impose unlimited financial penalties on individuals under EU market abuse legislation.

No employee or complementary worker may deal in GlaxoSmithKline plc ("GSK") securities if in possession of *Inside Information* about GSK. Equally, GSK employees and complementary workers may not deal in GSK securities on considerations of a Short-Term Nature.

GSK employees and complementary workers may not deal in the securities of another company with which GSK is doing business or negotiating if they have possession of inside information related to that company.

GSK employees and complementary workers may not, unless authorised as part of their role, pass on Inside Information at any time to any other person, inside or outside GSK, even if the person does not profit directly from the arrangement.

Anyone who is in possession of Inside Information (and GSK's quarterly financial results prior to external publication) as part of their role should be particularly aware of this policy.

Failure to comply with this policy may result in internal disciplinary action. It may also mean that you have committed a civil and/or criminal offence.

Corporate Secretariat coordinates and manages GSK securities dealing process, and supports GSK's Disclosure Committee in managing GSK's insider regime and the identification and dissemination of Inside Information.

Please read the [Standard Operating Procedure for Dealing in GSK Securities](#), which sets out in detail how to comply with this policy, and what your legal obligations are.

Please also refer to the Share Dealing Guidance, which offers additional advice.

If you have concerns

If you have concerns about how to apply this policy you should bring them to the attention of a manager, supervisor or a member of Corporate Secretariat. If you see any violations of this company policy, please report it through the appropriate Speak Up channels.



To find your local Speak Up integrity line number or to report online, please visit: [GSK's Speak Up page](#).

If you are out of compliance or feel you are unable to comply with the policy, please contact your [Ethics & Compliance Business Partner](#).

Definitions of terms in italics in this document can be found in the [GSK Written Standards Glossary](#)

Administration

Governance Board Approval:	GSK Board of Directors
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Owner:	Victoria Whyte, SVP, Company Secretary
Author:	Richard Webster, Interim Director, Governance, Plc & Shareholder Services
History:	This policy supersedes and replaces POL_87129 (9.0) – Code for Dealing in GSK Securities POL-GSK-008
	Changes since last revision
	The main changes are:
	– Reference to Share Dealing Guidance added
	– Update of Speak Up link
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See CDMS for Document Effective Date