

Code for Dealing in GSK Securities



POL-GSK-008

Why we have this policy

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

Under the Criminal Justice Act 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.

GSK employees and contingent workers may not deal in the securities of another company with which GSK is doing business or negotiating whilst in possession of inside information in relation to such company.

GSK employees and contingent workers should 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.

To give clear guidance to GSK employees and contingent workers on the practice and pre-clearance procedures to be followed before dealing in GSK securities or those of any company with which GSK is doing business.

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.

What you need to know

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](#) and [Code for Dealing in GSK Securities FAQs](#), which offers additional advice.

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.

If you have a concern turn to page 2 for guidance

Speak Up

Policy on Dealing in GSK Securities



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If you have a concern

If you have a question about this policy then you should read the [Standard Operating Procedure for Dealing in GSK Securities](#) and /or speak to a member of Corporate Secretariat.



To find your local Speak Up integrity line number or to report online, please visit: www.gsk.com/integrity

If you are out of compliance or feel you are unable to comply with the policy please contact your [business unit Compliance Officer](#)

Definition of terms in italics can be found in the [Glossary](#)

Additional information

Approval GSK Board of Directors

Owner SVP & Company Secretary

Author Director, Governance, Plc & Shareholder Services

Approval Date 17 June 2016

Effective Date 3 July 2016

History

Current Version:

17 June 2017: POL-GSK-008 v07
Policy amendments due to regulatory change.

17 June 2016: POL-GSK 008 amendments approved by a duly authorised Committee of the Board
7 May 2015: POL-GSK 008 revised and introduction of SOP-GSK 008 - approved by the Board
04-October-2007: V05 - Further amendment approved by the Board
01-April-2006: V04 –Further amendment approved by the Board
1-July-2005: V03 – Amendment approved
19-July-2001: New GSK Policy POL-GSK-008 V01 – supersedes SBCC-07, SBCC-08 and GW 6.5