Anti-Bribery and Corruption Policy

TABLE OF CONTENTS

Why do we have this policy? 2
Who needs to follow it? 2
What do you need to know? 2
1. The ABAC principles 3
2. Gifts, hospitality and entertainment 3
3. Interactions with Governments and Government Officials 3
4. Grants and donations 6
5. Political donations, sponsorships and lobbying 6
6. Dealing with third parties 7
7. Hiring and secondments 8
8. Books and records 8
9. Conflicts of interest 9
10. Demands for a bribe or extortion 9
Where to raise questions, concerns or exceptions 10
Consequences of non-compliance 10
Document administration 10
Appendix 1: Anti-money laundering, counter-terrorist financing, prevention of fraud and prevention of facilitation of tax evasion 11

Why do we have this policy?

GSK is committed to complying with all applicable laws and regulations designed to combat bribery and corruption and related economic crimes, including fraud, money laundering, tax evasion and terrorist financing. This policy sets out the key anti-bribery and corruption (ABAC) requirements, as well as requirements to ensure compliance with related economic crime legislation. GSK staff must consider all requirements of this policy, its supporting policies and related documents to ensure compliance. In the event of a contradiction between GSK's policies and procedures and applicable laws, the stricter approach applies.

GSK staff must adhere to the ABAC principles in all interactions for and on behalf of GSK, even if a particular rule is not specified.

Who needs to follow it?

Global Business/Function(s):	**Specific Audiences:**
All GSK	All GSK employees and complementary workers (together referred to as GSK staff in this policy). Contracted third parties are not directly bound by the requirements of this policy unless expressly required in the relevant contract. GSK will only contract with third parties who abide by the law and uphold comparable standards of ethical conduct.

What do you need to know?

GSK does not tolerate bribery or corruption involving GSK staff or business partners.

- GSK staff must not, directly or through a third party, promise, offer, make, authorise, solicit or accept any financial or other advantage to or from anyone (including all Government Officials and persons in the private sector) to obtain or retain business, or secure an improper advantage in the conduct of business.
    - Financial or other advantage covers anything of value, including cash, gifts, services, job offers, loans, travel expenses, entertainment or hospitality.
    - Personal funds cannot be used to circumvent this policy.
- GSK prohibits all facilitation payments as they are bribes.
    - Facilitation payments are unofficial, improper, small transfers of value offered or made to secure or expedite a routine or necessary action to which we are legally entitled.
- Commercial bribery and corruption is prohibited. This includes giving or receiving anything considered valuable, for example cash, gifts, services, job offers, loans, travel expenses, entertainment, hospitality, kickbacks, discounts, rebates, investment opportunities or funding to improperly influence any commercial outcome.
- GSK has zero tolerance for any anti-competitive conduct, including bid rigging and collusion practices.

All GSK business activities must be conducted in line with GSK's culture, our Code and the ABAC principles. There are no exceptions to this requirement.

The ABAC principles

We act honestly, fairly and with integrity in all our business dealings and relationships wherever we operate. We comply with all ABAC and related economic crime requirements, including those designed to combat fraud, money laundering, tax evasion and terrorist financing as set out in the **Appendix** to this policy.

We use the ABAC principles to manage ABAC risk. Everything we do:

- Has a **legitimate intent**. Our activities, interactions and transactions have a valid purpose and are conducted in line with GSK's culture and Code.
- Is **transparent and properly documented**. We keep thorough and accurate records.
- Is **proportionate**. Transfers of value made, and resources invested meet, but do not exceed, the needs of the interaction or transaction.
- Is free from unmanaged **conflicts of interest or undue influence**. We do not exercise undue influence over those who interact with us. We identify, disclose and manage any conflicts of interests.

Gifts, hospitality and entertainment

The giving and receiving of gifts, hospitality and entertainment are often part of business relationships and cultural practices. However, they can lead to perceptions of unfairness, favouritism or conflicting interests.

We do not offer or receive gifts, hospitality or entertainment that could:

- influence or be perceived as capable of influencing the outcome of transactions or decisions relating to our business; and/or
- amount to or cause the recipient or giver to commit an offence.

We have policies in place to help ensure that all gifts, hospitality and entertainment are given and received appropriately, and in accordance with our ABAC principles.

GSK staff must not use personal money to provide gifts, hospitality and entertainment to avoid complying with policy requirements, even if no reimbursement is sought.

Interactions with Governments and Government Officials

GSK does not distinguish between Government Officials and private sector employees when it comes to our zero tolerance of bribery and corruption. However, interactions involving Governments and Government Officials require special attention because of the specific requirements imposed by legislation and the heightened risk that Governments and Government Officials could exert influence over our business.

We do not improperly influence Government Officials to obtain or retain business or an advantage in business for GSK. When interacting with Governments and Government Officials, we follow this policy and relevant written standards, and all applicable laws, regulations and codes of conduct.

Any relationship with Governments and Government Officials must be in strict compliance with the rules and regulations to which they are subject (i.e., any applicable rules or regulations in the country relating to Government Officials or that have been imposed by their employer) and any benefit conveyed to a Government

Official must be fully transparent, properly documented, and in line with policies and the law.

What does “Government” and “Government Official” mean?

The term "Government" means all levels and subdivisions of governments. This includes all local, regional, national, administrative, legislative, executive, or judicial, and royal or ruling families.

The term “Government Official” includes the following:

- any officer or employee of a government or any department, agency or instrumentality of a government (including public enterprises, and entities owned or controlled by the state);
- any officer or employee of a public international organisation such as the World Bank, the World Health Organisation and the United Nations;
- any officer or employee of a political party, or any candidate for public office;
- any person defined as a government or public official under applicable local laws (including anti-bribery and corruption laws) and not already covered by any of the above; and
- any person acting in an official capacity for or on behalf of any of the above.

This definition also includes “close family members” of Government Officials. Close family members of Government Officials are those with a close familial or domestic connection to a Government Official and include: (a) that person’s children and spouse or domestic partner; (b) children of that person’s spouse or domestic partner; and (c) dependants of that person or that person’s spouse or domestic partner.

Documenting interactions with Government Officials

GSK maintains a Government Officials Interactions log where in-scope interactions between GSK staff and Government Officials must be documented.

All GSK staff are accountable for documenting interactions accurately and in a timely manner and interactions must be monitored by appropriately senior GSK staff.

Travel and accommodation expenses for Government Officials

GSK staff cannot pay for or reimburse travel and accommodation expenses for Government Officials if this is prohibited by law.

GSK staff can pay or reimburse reasonable travel and accommodation expenses incurred by Government Officials where there is a legal requirement to do so.

Reasonable travel and accommodation may be provided, in accordance with our Travel & Expenses Policy, to external experts with an influence on our business who have been engaged to provide a service on our behalf if required to fulfil the contracted services.

If there is a prohibition on paying for or reimbursing travel and accommodation expenses for Government Officials, GSK cannot reimburse these. If there is no legal requirement to do so (i.e. the law is silent), then the default position is that we should not pay for or reimburse these costs.

Meetings with Government Officials

Meetings with Government Officials must be for legitimate GSK business only. Meetings must follow relevant laws, including competition and ABAC laws.

Meetings must occur in the ordinary course of business. The default location for meetings should be at a GSK office or site or the offices of the Government Official in question. If that is not possible, then meetings can be held at a location which is convenient for the parties. Meeting venues must not be inappropriately lavish, and interactions must be in line with the ABAC principles.

Site visits

Government Officials may visit GSK sites if not prohibited by local laws, regulations and codes of conduct of the Government Official and at least one of the following conditions are met:

- There is a valid business, clinical, scientific, technology, regulatory, medical or public policy reason for the visit - for example, review meeting or regulatory inspection.
- They will be taking part in a specific official function - for example, formally opening the site or an extension.
- There are valid diplomatic or courtesy reasons.

A Government Official should only be invited to conduct a site visit if the site visit is relevant to that Government Official's official duties.

Meetings arranged by third parties

GSK staff may not provide direct financial support to Government Officials to attend meetings arranged by third parties. However, GSK staff may provide funding to, or be a member of, groups that provide independent financial support to Government Officials. These groups can include:

- pharmaceutical or professional associations;
- bona-fide foundations; and
- educational institutions.

The selection of Government Officials to receive funding must be made independently by the third party.

Engaging with current and former Government Officials

We do not contract the paid services of Government Officials in their official capacity who have an actual or perceived position of influence which could affect our business.

GSK staff can engage with Government Officials, directly or indirectly, as part of activities relating to market research or because of their specific expertise as external experts but must do so in line with GSK's policies on market research activities, and on engaging with external experts. All interactions must be in line with the ABAC principles.

GSK staff undertaking governmental or public-facing work

When staff are acting in their capacity as a GSK employee:

- They do not undertake any paid services for any Government body or Government Official.
- They may accept invitations to Government-arranged / -sponsored events. Reimbursement from the Government of any expenses requires prior approval from their line manager and review by their Compliance Business Partner.

All GSK staff must comply with GSK's Conflicts of Interest policy and declare outside and personal interests which are in-scope. The following activities must be disclosed:

- Acting as an official, advisor and/or consultant to a Government agency, trade or industry body, particularly in a role involving regulatory or supervisory power over (or another ability to affect or influence) GSK.
- Undertaking a formal role in a campaign for a political party, being a candidate in a political campaign or running for a governmental office.

Grants and donations

GSK provides grants and donations as part of its commitments to being a responsible business, to make a positive social impact, and to respond to challenges and opportunities in the healthcare or research system and our broader society.

All grants and donations must be provided in line with GSK's Grants and Donations Policy. Examples of grants and donations include:

- Charitable contributions (further details on GSK's charitable work can be found at GSK Charitable Investments)
- General support and core funding of requesting organisation.
- Funding to universities to support fellowships, scholarships, and academic university chairs.
- Product donations
- In-kind donations
- Equipment donations

Grants and donations must:

- Be provided without any intent to obtain or retain business, or any advantage in business for GSK.
- Be provided with the expectation of nothing in return (or only incidental benefits) to GSK.
- Have a legitimate purpose, and comply with applicable laws, regulations and industry and GSK codes of practice. These include the local laws of the GSK company providing the support, the country of the requesting organisation and the country of the activity, as appropriate.
- Be provided to support independent activities.
- Have a transparent approval process, with a properly documented rationale for the approval.

Business Owners must ensure that the recipients of grants and donations have adequate policies and procedures in place to manage the ABAC risks of the activities that they undertake using GSK funding.

Political donations, sponsorships and lobbying

GSK does not make political contributions or sponsor political party meetings, conferences or conventions. You may attend political party meetings, conferences or conventions on behalf of GSK, if you have a valid business reason for attending. You cannot attend political fundraising events on behalf of GSK. You may do so in a private capacity only.

GSK does not sponsor social events at political meetings, conferences or conventions. GSK staff may attend social events at such meetings, and GSK will pay for the cost of attendance, if all four of these criteria are met:

- the social event is incidental;
- the intent of the social event is not to raise funds;
- costs are moderate; and
- there is a valid business reason for attending the event.

GSK staff are allowed to work with public policy groups that engage Government Officials and/or arrange events involving Government Officials so long as your interactions are in line with the ABAC principles and relevant GSK policies.

GSK may partner with independent bodies, such as public policy groups, to run satellite meetings at political meetings or conferences. GSK's sponsorship is declared clearly on programme invitations and other meeting or conference related materials.

Staff contributions to, and the lawful activities of, the GSK Political Action Committee (PAC) in the US are unaffected by the provisions of this section. GSK staff may attend on behalf of GSK events arranged, sponsored and/or funded through the GSK PAC.

GSK engages in legitimate lobbying activities to provide policy makers with information to inform decision-making related to better outcomes for patients and abides by transparency rules operating in the relevant jurisdiction.

Lobbying should not be misused for any corrupt or illegal purposes, or to improperly influence any decision.

Further information on GSK's position on political advocacy can be located at GSK's Position on Political Advocacy.

Dealing with third parties

While contracted third parties are not directly bound by the requirements of this policy unless expressly required to in the relevant contract, GSK expects that all contracted third parties execute and maintain standards of ethical conduct in line with GSK's Code and fully comply with all applicable ABAC laws whenever engaged in GSK business.

Before working with a third party, we ensure that:

- all third-party risk assessment processes are completed thoroughly and with accurate information, so that ABAC and economic crime risks set out in the **Appendix** are identified, assessed, and managed; and
- third parties engaged do not expose GSK to undue legal or reputational risk.

We have procedures in place to support GSK staff in managing their work with third parties.

Payments to GSK third parties

All payments to GSK third parties must be made via an approved GSK financial payment system and must be appropriately recorded in GSK's books and records.

Payments are not made to any third party in cash or cash equivalent (such as a gift card).

Finance is accountable for the implementation and monitoring of the required payment controls to ensure compliance, including maintaining a list of bribery risk by country.

Hiring and secondments

People must be hired solely based on merit, ability, and company need.

Pre-employment / pre-engagement screening is used to help protect our employees, assets, intellectual property and products.

Human Resources is accountable for conducting screening checks to ensure that the people we hire have:

- The qualifications they claim.
- The experience required for their positions.
- Alignment with GSK's Code.
- No history of bribery and corruption or dishonesty offenses.

Employment of former Government Officials

We exercise caution when employing and engaging former Government Officials to work for GSK.

Hiring managers are accountable for ensuring that employees, including those who are former Government Officials, who come to work at GSK identify and disclose all conflicts of interests.

Hiring managers must discuss with former Government Officials who come to work for GSK whether any of the disclosed conflicts of interest could:

- create an unfair competitive advantage for GSK;
- create a conflict of interest for GSK;
- conflict with the candidate's undertakings with their prior employer; or
- impact the Government Official's compliance with professional integrity rules.

Hiring managers must agree appropriate management of the disclosed conflicts of interest with former Government Officials, in line with our Conflicts of Interest policy.

We aim to fully mitigate the risk that a former Government Official engaged by GSK misuses or is encouraged to misuse, information that they received whilst in their role as a Government Official.

Books and records

GSK is legally obliged to make and keep books, records, and accounts, which, in reasonable detail, accurately and fairly reflect our business dealings. Our books and records must accurately reflect the rationale, purpose, substance and legality of transactions and payments.

Books and records include accounts, invoices, correspondence, memoranda, papers, books, and other documents or transcribed information of any type (whether in physical or electronic form).

All GSK staff are accountable for ensuring that:

- All payments by GSK and all our contracted third parties must be supported by thorough and accurate documentation, such as receipts and invoices.
- Records, including supporting documentation, are kept in reasonable detail to reflect our business affairs and transactions accurately and fairly.
- Records of all transactions should evidence execution in accordance with applicable GSK policies and professional accounting standards.

The following practices are prohibited:

- Authorising or funding any transaction that is undisclosed or unrecorded in GSK's books, records and accounts.
- Approving, inducing or making any payment with the purpose or understanding that any of it will be used for anything other than what is described in the supporting documents.
- Omitting, falsifying or disguising entries in any of GSK's books and records or inducing or facilitating any third party / artificial intelligence to do so on their / its own.
- Paying expenses that are improper, unauthorised, and/or not supported by adequate documentation.
- Mischaracterising or omitting any transaction on GSK's books and records, or those of our contracted third parties.
- Inducing or facilitating third parties to make incomplete or misleading entries in their records.

All GSK staff who have custody of books and records used for the purposes of recording GSK business are responsible for their accuracy and security.

Conflicts of interest

All GSK staff are accountable for identifying, disclosing and managing conflicts of interest in accordance with GSK's Conflicts of Interest policy. GSK also has procedures to support staff in managing third party conflicts of interest, and conflicts of interest with external experts.

Our business decisions must be governed by good judgement, not personal or outside interests.

Demands for a bribe or extortion

We avoid opportunities for others to solicit an illicit payment and, to the greatest extent possible, we refuse all requests for illicit payments. There are no adverse consequences at GSK for refusing to make an illicit payment, even if that results in a negative impact to the business.

In very rare circumstances where the personal safety of GSK staff is threatened, GSK staff may accede to a demand for a bribe but must report this through relevant internal channels as soon as possible.

Where to raise questions, concerns or exceptions

Our GSK Speak up integrity lines are available to report alleged breaches of legal or regulatory obligations, including breaches of this policy.

Consequences of non-compliance

All GSK staff are expected to be aware of and comply with this policy and immediately report any actual or suspected violations. All GSK staff are required to co-operate with any management review or internal investigation that subsequently arises. If GSK staff breach this policy, they may also be breaking the law and there may be consequences for them and GSK. They could face disciplinary action up to and including termination of their employment with GSK.

Employees who breach this policy may be subject to GSK's recoupment policies.

Document administration

Effective date	6 January 2025
Owner	GSK plc Chief Compliance Officer
Author	Head of Anti-Bribery and Corruption and Assistant General Counsel
Version	VQD-POL-003454 (1.0)

Appendices

Appendix 1: Anti-money laundering, counter-terrorist financing, prevention of fraud and prevention of facilitation of tax evasion

We take personal responsibility to do the right thing to be a trusted company. We apply the ABAC principles to ensure that we comply with all applicable economic crime legal requirements.

Anti-Money Laundering, Counter-Terrorist Financing and Tax Evasion

All GSK staff are accountable for ensuring that GSK is not used to facilitate the flow of, or conceal the origin of, criminally derived funds, and that we do not become involved in the financing of terrorism. We do not conduct transactions that involve the benefit, property or proceeds resulting from crime including bribery, fraud and tax evasion.

This means that we:

- Only deal with reputable third parties.
- Are alert for and immediately report to ABAC Legal Counsel any unusual or potentially suspicious activity that could involve money laundering, terrorist financing, violations of law or regulation, or any other activity that has no apparent legitimate business purpose.
- Are alert to suspicious transactions where we have concerns regarding the parties involved, the structure and/or its proceeds.
- Do not deal with, possess, conceal or assist any person to deal with or conceal funds, assets or property where there is knowledge or suspicion that the funds relate to underlying criminal offending or to terrorist financing.
- Regard transactions with unusual terms or features, such as the use of cash or the use of shell companies or entities based in tax havens or high-risk countries, as red flags.
- Do not take any actions to facilitate others to evade taxes in any country.

Fraud

Fraud is the intentional deception to secure an unfair or unlawful gain, or to cause loss to a victim or to expose the victim to a risk of loss.

GSK has a zero-tolerance attitude towards fraud and complies with all applicable legislation. We do not tolerate GSK staff or any third party committing, aiding, abetting, counselling or procuring any fraud-related offence for anyone's benefit, including GSK.

Fraud includes the following:

- **fraud by false representation**: a person commits fraud by intentionally and dishonestly making a false statement;
- **fraud by failing to disclose information**; a person commits fraud if they dishonestly fail to disclose relevant information;
- **fraud by abuse of position**: a person commits fraud if they dishonestly abuse their position;

- **obtaining services dishonestly**: a person commits fraud if they obtain services for which payment is required, with intent to avoid payment;
- **participation in a fraudulent business**: a person who is a company director commits fraud if they are knowingly party to the carrying on of a company's business with the intent of any fraudulent purpose;
- **false statements by company directors**: a person commits fraud when they mislead investors, shareholders, staff or investigators about the business in a way that influences the course of the business or the market;
- **false accounting**: a person commits fraud when they falsify, alter, inaccurately or deceptively record accounting records with the intent to defraud or deceive;
- **fraudulent trading**: a person commits fraud when they purposely and deliberately continue to trade, accept credit supplies from creditors, or accept orders from customers, despite knowing that they cannot repay the creditors or provide the customers' orders; and
- **cheating the public revenue**: a person commits fraud when they make a false statement with the intention of defrauding tax authorities.

The following activities also constitute fraud and are not tolerated at GSK:

- financial reporting fraud (e.g., delaying the recognition of an asset revaluation until the next year, or intentionally not disclosing liabilities or expenses);
- theft of intangible assets such as intellectual property or patents;
- dishonest statements about the effectiveness of medicines;
- misleading a public body as to the true extent of profits being made from a contract; and
- mislabelling information.