

GSK Policy		Title: External Communications to Investors and Media; External Speaking Engagements and Publications
Official Short Title: External Communications Policy		
Key Points		
➤ Communications with external audiences must be managed via appointed company spokespeople		
➤ Employees must seek any necessary permissions and comply with all legal and regulatory requirements associated with external communications to minimize the risk to GSK's reputation		
➤ Employees are not permitted to make any public postings of confidential or proprietary information related to any aspect of GSK's business on the Internet.		
Why do we have this policy? To minimize the risk to GSK's reputation that can be caused through improper and unauthorized external communications.		
What does this policy say?		Who in GSK has general obligations under this policy?
The Basics	1. Purpose 2. Scope	All GSK Staff <input checked="" type="checkbox"/>
Specific Requirements	3. Responsibilities 4. Policy 5. Communication of Issues	What functions in GSK have specific obligations under this policy? Audit, Compliance, & Quality <input type="checkbox"/> Communications <input checked="" type="checkbox"/> Govt. & External Affairs <input checked="" type="checkbox"/> Finance <input type="checkbox"/> Global Procurement <input type="checkbox"/> HR <input type="checkbox"/> IT <input type="checkbox"/> Legal <input type="checkbox"/> Manufacturing & Supply <input type="checkbox"/> Marketing, Sales & Support <input checked="" type="checkbox"/> Medical <input type="checkbox"/> Research/ Development <input type="checkbox"/> Supervisors & Management <input checked="" type="checkbox"/> Senior Management <input type="checkbox"/> Other <input type="checkbox"/>
Glossary and Administration	Glossary Administration Waivers Related Documents	Contacts: Corporate Ethics & Compliance 1-866-GSK Ethics

The Basics

1. Purpose

The reputation of GSK amongst its key audiences is vital to the organisation's business success. In an age where information about a company flows instantaneously and globally it is critical that our communications with external audiences are managed in a co-ordinated way via appointed spokespeople (either communications/IR specialists or GSK executives) and our messages are not only consistent but aligned with the policies and needs of the company. Our key audiences are closely inter-linked, with the media acting as a conduit to all of them. In the interests of the reputation of the company and shareholder confidence, it is important that the information we issue externally is accurate, consistent and timely.

2. Scope

This policy applies to all GSK employees worldwide.

The Specifics

3. Responsibilities

Senior management of GSK, GSK functions, and GSK Business Units are ultimately responsible for ensuring compliance with this policy. All employees involved in any external communications are responsible for complying with this policy. Violations of this policy could be considered gross misconduct and are subject to disciplinary actions that may include dismissal from the company.

4. POLICY

As an over-riding principle, no employees in the organization should communicate externally about GSK's prospects, performance and policies, or disclose Unpublished Price Sensitive Information, without appropriate authority (See also [Code for Dealing in Securities](#) POL-GSK-008 and [Company Assets and Proprietary Information](#) POL-GSK-100). Specifically, they should not make sales or profits forecasts, nor predict product and regulatory approvals or launch dates or communicate information which is not already in the public domain (unless they have prior approval from Corporate Communications or Investor Relations.) As a further overriding principle, all disclosure in reports and documents that GSK publicly releases and/or files or submits to appropriate authorities must be full, fair, accurate, timely and understandable.

4.1. Investor Relations

4.1.1. Communication with the Investment Community - Spokespersons

The Investor Relations function is responsible for GSK's dissemination of information to financial analysts and institutions. Other than the Chairman, CEO and Chief Financial Officer, and Investor Relations management, no other GSK personnel may speak to the investment community for GSK without prior approval by the Chief Financial Officer or Vice President, Investor Relations.

4.1.2. Presentations to the Investment Community

All invitations to present to the investment community should be directed to the Vice President, Investor Relations, to be considered in the context of the overall Investor Relations programme. Once agreed, all presentations will be managed and attended by Investor Relations personnel.

4.2. Communication with the Media

It is the company's policy to manage its relations with the media in an open and pragmatic way. The company will be responsive to the legitimate interests of the media. It will also be proactive in disseminating information about the company, its policies and products when it is judged to be in the best interests of the business by corporate, functional or local management.

4.2.1. Media Calls

All requests from the media should be recorded accurately and passed on immediately to Corporate Communications or personnel with communications responsibility in each country/business/function. This includes formal requests for interviews as well as enquiries, and includes all media – TV/Radio, newspapers, magazines, local/national and trade media and internet sites. Communications personnel or those with responsibility for communications will either respond on GSK's behalf, or assist in identifying the appropriate person from GSK to handle the response.

It is recognised that from time-to-time certain countries/businesses/sites do not have designated communications personnel. In these cases it is the responsibility of local management to designate personnel to assume this role.

4.2.2 Spokespersons – Communications Staff

Communication with the media is undertaken both by Corporate Communications staff (primarily the UK/US Corporate Media Teams) (see Section 5.1 for definition of “Corporate Communications”) as well as communications staff in countries / businesses / functions throughout the GSK organisation. In general corporate issues - i.e. those affecting, or with the potential to affect, the reputation of GSK as a whole or to affect the share price - should be managed/handled by the UK/US Corporate Media Teams. Local issues, or local manifestations of corporate issues, should be managed by the personnel with communications/media relations responsibility in each country / business / function.

4.2.3 Spokespersons – Corporate Executive Team

It is often appropriate and in the company’s interest to provide spokespeople from the executive management of GSK. This should be undertaken under the direction of communications staff, who will provide the necessary preparation and materials, as well as attend the subsequent interviews.

4.2.4 Spokespersons – Designated Employees

The UK/US Corporate Media teams or communications staff in countries / businesses / functions may designate individuals other than those with communications responsibilities to serve as company spokespersons on an *ad hoc* basis. No employee should talk with the media without the approval and advice of communications staff, who will provide the necessary preparation and materials as well as attend the subsequent interviews. Designated spokespersons may only speak on behalf of the company on issues directly related to their specific area of expertise, and may not address reporter inquiries related to other topics or issues, as even the release of accurate information, provided at the wrong time, could put the company at a competitive disadvantage or pose problems under security laws.

4.2.5 Personal Representation in the Media

It is recognized that from time-to-time, employees may be approached by the media on topics related to their personal interests or non-work related activities. Employees may participate in such interviews. However, in order to avoid any confusion about whether an employee is speaking on their own behalf or on behalf of GSK, employees may not reference GSK or their role with the company, unless they have obtained prior approval to do so from Corporate or country / business / function communicators.

4.3. Country / Business / Function Responsibilities

Businesses, functions and countries must maintain contact with Corporate Communications or designated country / business / function communications personnel on matters likely to be important to GSK and likely to come to public notice, including:

- Introduction, withdrawal, acquisition or sale of products or the acquisition or sale of businesses;
- Major personnel changes, operating procedures, organization, products or policy involving or affecting GSK;
- Public statements, publications or coverage relating to government actions or investigations affecting GSK; and
- Litigation issues.

When communications issues or projects cross country or business / function lines, communicators must contact the appropriate colleague in that country or business / function for review and approval of proposed communications plans and messages, prior to media outreach.

4.4. External Speaking Engagements and Publications

External speaking engagements are discouraged unless there is a clear benefit to GSK, and employees should obtain permission from their manager before accepting an external speaking engagement.

4.4.1 GSK Ambassador / Value of Medicines Presentations

In appropriate context and with permission from their manager, employees may use approved materials that appear on the company's GSK Ambassador or Value of Medicines Intranet sites in external speaking engagements. Employees should check with their manager about how the information can be adapted for particular businesses or functions. If local facts are added to approved GSK Ambassador materials, legal and/or regulatory approval may be required. It is possible that press could attend these Ambassador or Value of Medicines presentations. In those cases, employees should report any contact with the media to their appropriate Corporate or country / business / function communicator, and respond at the event only to inquiries directly related to the facts relayed in the presentation.

4.4.2 Guidelines for External Presentations

In addition, to protect GSK proprietary information and ensure that external communications conform to GSK standards of accuracy, content, and style:

- All invitations for external speaking engagements that involve the company's corporate position, policies or products with the potential to impact the corporate reputation should be referred to the head of the individual's business unit, Corporate Communications, or designated country / business / function communications contacts. Excluded from this requirement are routine invitations/submissions such as manuscripts for medical journals or presentations to specialist meetings.
- Proposed disclosures and announcements about significant new GSK business ventures, including joint ventures with other companies, should be referred to the Corporate Communications Vice President or the appropriate Communications Vice President in that business / function who is a member of the GSK Corporate Communications Executive Team.

4.5. Third Party Announcements, Endorsements and Use of the GlaxoSmithKline Logo

From time-to-time, organizations or businesses external to GSK may seek to issue a news release that promotes a business relationship or identifies a partnership with GSK. Such announcements by third parties require advance approval from Corporate Communications or the Communications staff in the country / business/ function. Department heads are required to present the business rationale for the issuance of news releases by third parties that refer to an existing or proposed relationship with GSK. Corporate Communications or the Communications staff in the country / business / function will then work with the third party to determine appropriateness of the announcement and a plan for the external distribution of the information.

In general, GSK does not allow the use of its name, logo or statements by its employees in the printed or electronic documents of suppliers, consultants, business partners or other third parties without the written permission of the company's Corporate Communications department, the Communications staff in the country / business/ function or an appropriate authority within a business unit. All requests from third parties to use the company logo should be referred to Corporate Internal Communications, which will provide guidance on the correct use of the logo.

From time-to-time, organizations or businesses external to GSK may seek information from the company in the form of surveys or other data-gathering exercises. Third parties also request permission to enter GSK projects or materials in external competitions, or cite those projects in marketing materials. Participation in such activities is expressly prohibited without the direct approval of Corporate Communications, the Communications staff in the Country / Business / function, or the appropriate department head. This is to avoid wasting staff time or providing information that can be used for the profit or benefit of 3rd parties, and to the possible detriment of GSK.

4.6 Internet Communications

Employees are forbidden from making any public posting of confidential or proprietary information related to any aspect of GSK's business on the Internet. Employees should not reveal information about the company and its activities in any internet-based forum including (but not restricted to) chat rooms, bulletin boards, blogs, wikis, etc. Business-related internet-based tools may be operated by GSK but their use and content must be approved in accordance with the normal code of practice applicable in that market, plus the standard controls required by the [Global Procedures for Use of Digital Channels \(SOP-GSK-502\)](#) where third parties are allowed to post to the social media tool.

5. Communication of Issues

- 5.1.** Please contact the VP, Corporate Identity and Communications if you have any issues or questions on the policy.

Glossary & Administration

Glossary

Corporate Communications: refers to the central communications function led by the SVP, Corporate Communications and Community Partnerships. The UK/US Corporate Media Teams are part of this organization.

Country / Business / Functional Communications: refers to those individuals who are given specific responsibility within GSK for external communications, but are employed outside the Corporate function.

Unpublished Price Sensitive Information: refers to hard facts about GSK or its business or other companies with which GSK is doing business or negotiating that are not generally known to the public but would be likely, if known generally, to affect the share price of GSK or those other companies. It does not matter how an individual came to possess such information – whether in his or her job or from a colleague or friend. Such information may include (but is not limited to):

- Financial forecasts and financial results before their announcement;
- Dividend information, including changes in dividend policy;
- Trading prospects, including information on its markets;
- Acquisitions and disposals;
- Major restructuring programmes;
- Capital structure changes, including redemption of securities;
- Changes to the Board of Directors or other major managerial positions;
- Significant product news, including discoveries, regulatory approvals and licensing deals; and
- Significant potential litigation.

Administration

Approval:	Corporate Executive Team (CET)
Owner:	SVP, Corporate Communications and Community Partnerships
Author:	VP, Corporate Identity and Communications
Approval Date:	08 January 2008
Effective Date	4-NOV-2010
History:	<p>4-NOV-2010: POL-GSK-301 v06: administrative updates: related documents links, section 4.6 link change, and cover page format update</p> <p>08 Jan 2008: Version 05: revised section 4.6</p> <p>05 Jan 2005: Version 04</p> <p>21 May 2003: Version 03</p> <p>21 May 2003: Version 02</p> <p>11 Oct 2001: POL-GSK-301 V01 New GSK policy; supersedes 07 Oct 2002: Version 2GW 6.1 and SBCC-73</p>

Waivers

Any requirement of this Corporate Policy may be waived conditionally on a case-by-case basis in exceptional circumstances with written approval from the Corporate Compliance Officer or the CET. All requests for exceptions/exemptions should be directed to Corporate Ethics & Compliance (CEC).

Once approved, these exceptions will be recorded by CEC and posted on the Corporate Ethics & Compliance web community for visibility. The approved exception author/sponsor is required to notify all relevant GSK employees, contractors and third parties of the granted exception

Related Documents

[GSK Code & Standards of Conduct](#)
[Global Procedures for Use of Digital Channels](#) (SOP-GSK-502)
[Code for Dealing in Securities Policy](#) (POL-GSK-008)
[Protection of GSK Information Policy](#) (POL-GSK-100)
[Protection of GSK Information Procedure](#) (SOP-GSK-100)