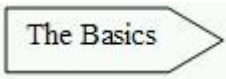
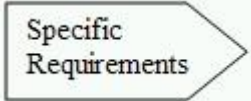
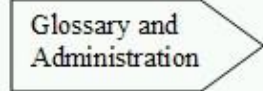


GSK Standard Operating Procedure		Title: Safeguarding GSK Employees Who Report Unethical or Illegal Conduct
Official Short Title: Protecting Employees that Report Misconduct		
Key Points		
<ul style="list-style-type: none"> ➤ This Standard Operating Procedure (“SOP”) will communicate the minimum, standard procedure throughout GlaxoSmithKline (“GSK”) for safeguarding employees who have reported unethical or illegal conduct under GSK’s Code of Conduct, other GSK policy, or external legal standard. ➤ This SOP is designed to encourage internal reporting to support GSK’s policies, Values, and “Speak Up” culture. 		
Why do we have this SOP?		
<p>GSK’s Code of Conduct and standard operating procedures require employees to raise concerns about possible unethical or illegal conduct internally and assure those employees of confidentiality and protection from retaliation, retribution and any form of harassment for raising the concern. This SOP provides the minimum, standard expectations and procedure to effectuate these requirements.</p> <p>Importantly, this SOP is designed to encourage internal reporting of concerns by employees and to support GSK’s Values and “Speak Up” culture by taking proactive steps to ensure that employees who raise good faith concerns are safeguarded, supported in the workplace, and recognized, as appropriate.</p>		
What does this SOP say?		Who in GSK has general obligations under this SOP?
	<ol style="list-style-type: none"> 1. Purpose 2. Scope 	All GSK Management and Staff Responsible for Management of Employees or Handling Internal Reporting <input checked="" type="checkbox"/>
	<ol style="list-style-type: none"> 3. Procedure 4. Communication 	What functions in GSK have specific obligations under this SOP? <ul style="list-style-type: none"> Audit, Compliance, & Quality <input checked="" type="checkbox"/> Communications <input checked="" type="checkbox"/> Govt. & External Affairs <input checked="" type="checkbox"/> Finance <input checked="" type="checkbox"/> Global Procurement <input checked="" type="checkbox"/> HR <input checked="" type="checkbox"/> IT <input checked="" type="checkbox"/> Legal <input checked="" type="checkbox"/> Manufacturing & Supply <input checked="" type="checkbox"/> Marketing, Sales & Support <input checked="" type="checkbox"/> Medical <input checked="" type="checkbox"/> Research/Development <input checked="" type="checkbox"/> Supervisors & Management <input checked="" type="checkbox"/> Senior Management <input checked="" type="checkbox"/> Other- Corporate Security <input checked="" type="checkbox"/>
	Glossary Administration Related Documents	Contacts: Corporate Ethics & Compliance 1-866-GSK Ethics

The Basics

1. Purpose

To communicate a minimum, standard procedure throughout GSK for safeguarding employees and contract staff (as appropriate given the nature of their assignment or engagement with the Company) who have reported perceived unethical or illegal conduct under GSK's Code of Conduct, other GSK policy, or other external legal standard.

This SOP will support GSK's Code of Conduct and all policies requiring the reporting of unethical or illegal conduct and prohibiting retaliation against employees who raise concerns.

This SOP is designed to encourage internal reporting to the proper channels so that concerns of unethical or illegal conduct related to GSK's business can be investigated and, if appropriate, corrective action can be taken to stop and prevent future recurrence of any unethical or illegal conduct.

This SOP supports GSK's Values and "Speak Up" culture by taking proactive steps to ensure that employees who raise good faith concerns are safeguarded, supported in the workplace, and recognized, as appropriate.

2. Scope

This SOP applies to all GSK personnel and management who are involved in, or who become involved in, the investigation or management of employees who have raised a concern of unethical or illegal conduct.

This SOP is intended to safeguard employees or contract staff regardless of whether:

- (i) The employee is the first or only source of the information (e.g. employees who raise concerns before or during the course of an active investigation);
- (ii) the concerns are substantiated or unsubstantiated by the investigation so long as the concerns are reported based on the employee's reasonable, good faith belief in their accuracy;
- (iii) the reporting employee has him or herself committed a violation of GSK policy or otherwise has some performance issue;
- (iv) the reporting employee is considered by management to be a poor performer; or
- (v) the report was made externally to GSK (e.g. with governmental stakeholders under applicable laws).

The Specifics

3. Procedure

3.1. Ways of Working

After publication of this SOP, the appropriate internal groups for investigating concerns of unethical or illegal conduct and managing employees within a particular jurisdiction, business unit, or local operating company will meet to develop a "ways of working" agreement to effectuate this SOP that will apply within that local jurisdiction (e.g. the investigative function, the Compliance function, HR function, the Legal function, representation of senior

management). This meeting will be facilitated by the appropriate HR personnel within the local jurisdiction.

3.2. Pre-Investigation

Prior to beginning an investigation into a significant concern of unethical or illegal conduct raised by a person, the appropriate personnel will discuss and agree on:

- (a) the level of internal elevation needed to ensure that all appropriate internal stakeholders are involved;
- (b) The person who is managing the investigation and communicating to the person who raised the concern during the investigation and at the close out meeting;
- (c) Whether the investigation involves any non-gsk employees. If so appropriate involvement of the non-gsk employee's employer in the investigation and any subsequent action will be identified; and
- (d) Whether there are any special precautions, beyond those described in this SOP, that are needed at the outset to safeguard the employee raising the concern during the investigation.

3.3. During the Investigation

3.3.1. During, or immediately after, the initial intake or interviews the appropriate personnel will communicate GSK's Code of Conduct's prohibition against retaliation and provide specific information to the person who reported the concern and any people involved in the investigation including the subject of the investigation and any management in the reporting employee's line if there is a compelling business reason to inform management of the investigation.

- (a) The information to be provided includes, but is not limited to, (i) the breadth of the Code of Conduct and its non-retaliation prohibition and any other country specific non-retaliation policies (e.g. the types of behaviors that are covered/prohibited by the policy) so the individuals are clear about the policy, its breadth, and their responsibilities, and (ii) contact information for key GSK personnel for support that may be needed if the employee perceives retaliation during the pendency of the investigation (e.g. HRBL, or other HR personnel, Compliance Officer, Legal, or senior level management as appropriate).

The GSK personnel who is handling the investigation will memorialize this information in a document to the employee (e-mail or memorandum of understanding) and retain a copy in the appropriate GSK file.

3.3.2. If, during the investigation, the employee who reported the concern expresses concerns of retaliation or interference with the investigation, the allegation should immediately be investigated and prompt intervention must be taken to address the concern. For example, if the concerns are founded the person who is the subject of the investigation (not the employee reporting the concern) should be placed on paid administrative leave pending the outcome of investigation and/or promptly disciplined up to and including separation of employment.

3.3.3. If, during the investigation, other employees raise concerns of unethical or unlawful conduct they will be given the same safeguards under this SOP. This SOP's protections are not limited to the first employee who raised the concern.

3.4. Conclusion of the Investigation: Close Out Meeting

Following the conclusion of the investigation, the appropriate GSK personnel will conduct a "close out" meeting with the person who raised the concerns.

3.4.1. The purpose of the close out meeting is to:

- (a) communicate to the employee that the matter has been investigated and, if appropriate, addressed through remedial action; and
- (b) affirm GSK's non-retaliation policy and address any specific concerns the employee may have and provide them with details of who to contact if they have any further concerns.

3.4.2. This close out meeting is particularly important when an employee brings forward a concern that is deemed founded following investigation but the employee would not have visibility to remedial action taken. While the close out meeting would not require (nor foreclose the possibility) that specific details be provided to employees regarding remediation, it would provide assurances that the Company is taking remedial action.

Additionally, the close out meeting would extend to employees who participated in interviews during an investigation and provided key information related to the allegation to update them on the status of the investigation and any remediation taken as appropriate. It will be necessary to exercise judgment in these cases regarding which interviewees are appropriate and how these meetings are conducted. Again, the protections of the SOP are not limited to the first employee who raised the concern.

3.4.3. The close out meeting should be documented in the standard or local systems for tracking and reporting allegations and investigations.

3.4.4. The GSK personnel responsible for the investigation will deliver a "close out" letter to the employee and the key information under this SOP will be included in that letter.

3.5. Conclusion of the Investigation: HR Follow up

Following the close out meeting, the appropriate HR personnel will contact the employee(s) who brought forward the concern to discuss, if appropriate, whether the offending practice has ceased and to, again, affirm the Company's non-retaliation policy.

3.6. This meeting would occur at regular intervals following the close out meeting (i.e. 6 months and one year following the close of the investigation). This follow up should be scheduled, tracked, and documented in the local systems for tracking and reporting allegations and investigations.

3.7. Conclusion of the Investigation: Recognition

Following the close of the investigation, the relevant personnel may provide appropriate recognition to the employee who has brought forward the concern within the appropriate channels if they are substantiated by the Company's investigation. For example, a letter of commendation for GSK Values-based behavior from a Vice President in the business unit, or Spirit Award. Other examples include a phone call or visit from senior management affirming the employee's Values-based behaviour or appropriate, positive consideration of the Values-based behaviour during the employee's end of year performance appraisal.]

3.8. Workplace Environment

GSK policy requires that employees who have raised a concern will have a respectful work environment that is free from fear of retaliation or retribution of any sort. This includes an environment free from retaliation or retribution from peers. To ensure this environment exists, special precautions may be necessary and should be considered on a case-by-case basis. For example:

- (a) Communication or training for managers and peers regarding the Company's policies;
- (b) Zero tolerance for behaviours which create even the perception of retaliation or retribution; or
- (c) Internal, public recognition to the employee who raised the concern for Values-based behaviours (where agreed by the employee and consistent with confidentiality requirements in policy and this SOP).

3.8.1. In some circumstances, despite the Company's best efforts to ensure a workplace free from fear of retaliation, the employee may seek a transfer internally. In these cases, and as a last resort, Line management in consultation with HR personnel should carefully assess whether a transfer is necessary and appropriate in the circumstances and ensure that the employee's terms and conditions of employment are not impacted negatively in any way.

3.9. Elevation before negative personnel action is taken on person who raised the concern

Before any adverse employment action is taken against an employee who has raised a concern, the decision must be first elevated to senior management, HR Business Leader, the Business Unit Compliance Officer, and the Legal department as appropriate to ensure that the proposed adverse employment action is appropriate and not connected to or motivated in any way by the employee's raising of the concern. For purpose of this SOP, the term "adverse employment action" includes any negative action impacting the employee or the employee's terms and conditions of employment whether formal or informal within an appropriate timeframe following the reporting of the concern and the completion of the investigation process. The appropriate timeframe for which this duty to elevate applies is a matter of judgment by HR, Compliance, or Legal according to the local standards or laws within the jurisdiction.

3.9.1. Any form of separation agreement or severance offer to an employee who has raised a concern must be elevated to the Legal Department and appropriate HR, Compliance and senior management personnel before any offer is discussed with, or extended to, the

employee.

3.10. Confidentiality

All personnel shall maintain the strictest level of confidentiality as to the identity of the employee raising the concern, and the highest level of professional discretion in conducting the investigation to preserve confidentiality to the greatest extent possible to conduct an effective investigation and take corrective action as necessary. For example, the identity of the employee bringing forward the complaint should not be shared with members of management in the employee's direct line unless there is a compelling business need to share the information. This may mean redacting an employee's name from any report of the investigation or withholding a report or specific information from some levels of management in the employee's chain.

3.11. Appropriate Escalation

The appropriate personnel should promptly elevate concerns of retaliation at any time during or after an investigation to ensure the appropriate level of GSK management are aware and the appropriate interventions can be implemented consistent with GSK's Code of Conduct and Standards of Conduct.

3.12. Tracking and Record Keeping

Specific action taken under this SOP and any allegations or findings of retaliation should be recorded according to GSK's standard or local protocols for tracking allegations of unethical or illegal conduct.

4. Communication of Issues

All questions or concerns around this Procedure should be directed to your respective Compliance Officer.

Glossary & Administration

5. Glossary

Acronyms:

BU – Business Unit

CIT – Compliance Investigations Team

CO – Compliance Officer

CSI – Corporate Security & Investigations

HR – Human Resources

SOP – Standard Operating Procedure

Administration

Approval:	Risk Oversight & Compliance Council (ROCC) / Corporate Executive Team (CET)
Owner:	Magnus Hibbert - SVP HR Corporate & GSF
Author:	Zachary Ward – Asst. General Counsel, Corporate Legal Ops
Approval Date:	19-SEP-2012
Effective Date	01-MAR-2013
History:	01-MAR-2013: SOP-GSK-014 v01 – new corporate standard operating procedure

Related Documents

- [GSK Code of Conduct \[POL-GSK-001\]](#)
- [Reporting of Misconduct \[SOP-GSK-003\]](#)
- [Procedure for the Conduct of Internal Investigations \[SOP-GSKF-522\]](#)