

Living our values and expectations

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Introduction



"Our values and expectations are at the heart of everything we do. They define our code of conduct and guide all who work for or on behalf of GSK.

"Our values and expectations are more than just words. Together they help guide us to our goal to be one of the world's most innovative, best performing and trusted healthcare companies. They shape our culture and guide our actions and decision making, so we can maintain the trust of the people who rely on us each and every day – our patients and consumers. It's up to all of us, every day, to keep GSK the kind of company we can all be proud of."

Chima Walm Rey

Emma Walmsley, CEO

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Our code of conduct - overview

Overview

At GSK, we believe it's not just what we achieve that counts, it's also how we achieve it.

We believe in making good choices and taking responsibility and accountability for them, so that we can become one of the world's most innovative, best performing and trusted healthcare organisations, and positively impact the lives of our patients and consumers. It goes beyond simply following laws and rules.

Living our values and expectations

Everyone who works for or on behalf of GSK must abide by the law, but our code of conduct goes beyond that. It also establishes the standards and policies that help us meet the commitments of our heavily regulated industry and work as a high performing team. Our values and expectations help define us, build trust with society and direct us to do the right thing every day.



This guide will help you to:

- 1. Understand our values and expectations
- 2. Use them to guide our everyday actions and decision making
- 3. Understand our core standards that uphold ethical behaviours



If you can connect to the GSK internal network, you can use keywords to help find policies within the Our written standards resource centre on Connect GSK.

Look for this icon for further information.



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Our values and expectations

Our values and expectations work hand in hand to guide our actions and decision making, so we can become one of the world's most innovative, best performing and trusted healthcare companies.



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Our values:

We are proud of our values. They are non-negotiable and inform everything we do.

Patient focus is about always doing the right thing for patients and consumers and striving for the highest quality.

Transparency helps us build trust with each other and with society by being honest and open about how and what we do.

Respect means supporting colleagues and the communities around us, and embracing diversity and individuality, so we can all achieve great things.

Integrity is about how we expect the highest ethical behaviours of ourselves and others.



Our expectations:

To thrive in an ever-changing world and achieve our purpose, we need to adapt some of our behaviours to keep us competitive, all while staying true to our values. That's why we have our four expectations.

Courage means setting high ambitions, setting an accelerated pace, making decisions even when it's difficult and speaking up when we see an opportunity to improve.

Accountability is about taking ownership, prioritising work that supports our strategy and delivering what we promise.

Development encourages us to bring the outside in and learn from others, and to ask for and give feedback, so we can continually grow as individuals, teams and as an organisation.

Teamwork is about all of us working better together on aligned objectives, understanding how our work contributes to our Innovation, Performance and Trust priorities, encouraging diversity of thinking and inspiring each other.



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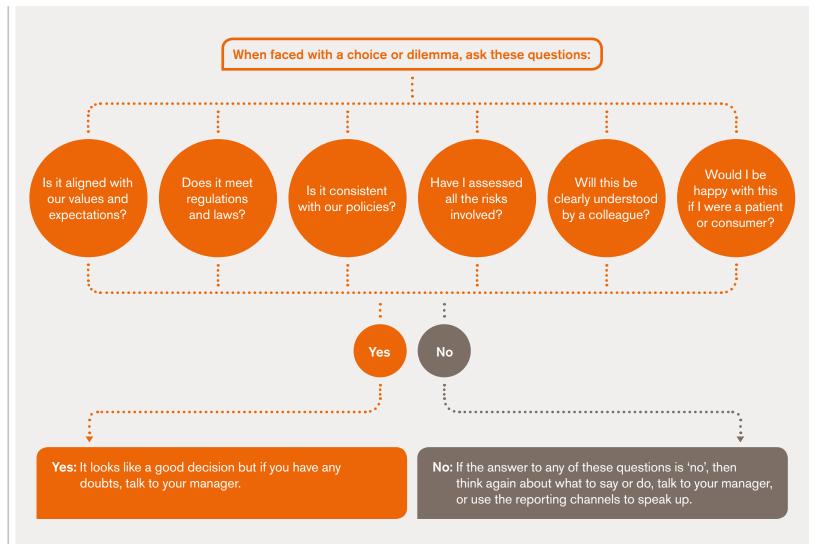
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How can our values and expectations help us make the right choices?

While GSK's written standards help all of us address the significant risks we face, it's not possible to cover every eventuality.

What to keep in mind when taking action or making a decision:

- Our values and expectations
- Appropriate regulations, standards and laws
- Tools to help us assess, treat, monitor and manage risk
- The possible impact on our patients and consumers, our company and ourselves



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Industry regulations and laws are vital to our work

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We are committed to abiding by country laws and regulations that apply to our company across the world.

When local laws, regulations, applicable industry codes or other business specific GSK standards are stricter than our global written standards, we work to comply with the strictest requirements. For example, we follow the UK Bribery Act (2010) and the US Foreign Corrupt Practices Act (1977) across our global company, as well as individual countries' competition laws, wherever we operate. Complying with these regulations ensures we compete on equal terms with no unfair advantages.

If you are unsure about the impact of different countries' laws on your local activities, check with your aligned Global Ethics and Compliance (GEC) and/or Legal representative(s). For more information on Our written standards visit Our written standards resource centre on Connect GSK.

Implications of not following this code of conduct

Our corporate standards and policies apply to everyone who works for or on behalf of GSK. Failure to comply with them or any applicable legal and regulatory requirements may result in disciplinary action, up to and including dismissal or termination of contract or assignment. For senior managers, this could include financial recoupment for significant misconduct. Managers also have the responsibility to ensure their teams understand and follow this code of conduct and applicable written standards.

Subject to local requirements, violations of this code of conduct by agency workers will be reported to their respective agencies. Violations of the code of conduct by all other complementary workers may result in termination of contract (subject to local requirements).

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Using your voice: How to speak up

When we all do the right thing and live our values and expectations, we build trust in GSK and protect our licence to operate.



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Option 1

Speak to your manager



Option 2

Raise a concern with local management. Human Resources, Global Ethics and Compliance or Legal



Option 3

Report confidentially online, by telephone or by email, or submit a report by post

Zero tolerance for retaliation

At GSK, you can report concerns without fear of reprisal. GSK prohibits retaliation against anyone who raises or reports concerns and will take disciplinary action up to and including dismissal (in accordance with local labour laws) against any employee who threatens or engages in retaliation or harassment of someone who has reported, or is considering reporting, a concern in good faith.

Similarly, we will report an agency worker who retaliates against anyone raising a report or concern to the worker's employment agency and terminate their assignment with GSK.

We are each accountable for speaking up if we have a concern, or see something that's not in line with our values and expectations. The first step is to speak with a line manager, or if that's not possible, contact your Human Resources, Global Ethics and Compliance or Legal representative.

If you feel unable or uncomfortable discussing an issue with a manager or an aligned representative, you can use the telephone, internet or postal reporting channels. These channels are managed independently of GSK, are available globally and allow for reports to be kept anonymous if the local laws and regulations permit it.

GSK treats all questions and issues confidentially, where possible, while investigating fairly, cooperating with governments and complying with legal obligations. When someone reports a concern in good faith, GSK will support that individual.

Managers also have a duty to raise any concerns brought to their attention. Those who ignore violations, or who fail to detect or correct them, could face disciplinary action.

Remember, by speaking up and raising concerns, you are living our values and expectations and doing the right thing.

www.gsk.com/speakup

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In the following section, you'll find some principles that help us to live our values and expectations



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How we protect patients and consumers and lead our industry.



2. Our company What we do to safeguard our company and its assets.



3. Our colleagues How we maintain our personal integrity and work with others.



How we engage with governments and groups, protect the environment and engage with the communities we work in.

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Our patients, our consumers, our industry



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Our patients, our consumers, our industry

We do the right thing for our patients and consumers and strive for the highest quality. We work with our partners to improve healthcare and find new medicines and vaccines. Regardless of our role, we understand how our work affects patients and consumers.

Keywords to search for on Connect GSK

- Medical governance
- Adverse event reporting
- Human safety information (HSI)
- Code of practice
- Scientific engagement

Code of practice documents

We have two code of practice documents – it's important to use the right one:

- Our code of practice for promotion of prescription medicines and for scientific engagement
- Consumer Healthcare code for promotion and scientific engagement

Protecting our patients and consumers

We gain our patients' and consumers' trust by focusing on their needs. That means always thinking from their perspective. We put their safety first, provide them with clear, up-to-date information and promote our products appropriately and ethically.

Promotional activities that meet industry and GSK standards

Our promotional activities and materials conform to high ethical, medical and scientific standards. They are legal, industry-compliant and evidence based.

If local laws, industry codes or GSK policies set higher standards, we comply with the strictest requirement.

Following the principles of scientific engagement

We make sure our scientific engagement is clearly distinct from the promotion of our products, never disguising or misusing our research to influence healthcare professionals and others inappropriately.

Ensuring product information is accurate

We provide complete, up-to-date and evidence based product information to healthcare professionals and consumers, wherever they are in the world.

Reporting a concern about a GSK product

Anyone hearing of any information regarding a side effect, adverse reaction or any other human safety concern on a GSK product. including possible lack of effectiveness, must report it to the Central Safety Department, or the local operating company medical department within 24 hours. Human safety information from clinical trials is reported as described in the study protocol.

Preventing counterfeiting

Counterfeit medicines and healthcare products pose a serious threat to the health and safety of our patients and consumers. They often lack the active ingredients to combat the illnesses they claim to treat and contain impurities that can actively cause harm. We are committed to protecting our patients and consumers from counterfeit products. That means we are all responsible for reporting any suspected counterfeiting of a GSK product.



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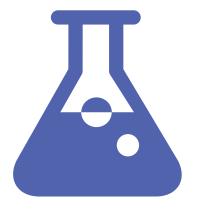
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Conducting research ethically

From safeguarding patients' personal information to sharing research data, we work to protect our patients and consumers and care for their well being while advancing science.

Keywords to search for on Connect GSK

- Ethical research
- Human samples
- Animal welfare
- Reporting counterfeiting
- Clinical trial disclosure



Following all research protocols and standards

The safety and well being of patients who volunteer to participate in our clinical trials is essential. Following research protocols and ethical, medical and scientific standards means we protect those who participate in our research to the best of our ability.

Understanding why we provide access to our research data

We share expertise, resources, intellectual property and know-how with external researchers and the scientific community to help advance science. This includes anonymised trial data, so the valuable contribution made by volunteers who participate in our research can be used in other studies. We protect patient confidentiality and ensure information is used only for valid scientific enquiry.

We also have a long standing commitment to data transparency. In 2004, we launched a Study Register which is available to the public online. We were also the first pharmaceutical company to sign up to the AllTrials campaign for clinical trial transparency in 2013.

Managing the quality of our products effectively

We strive to assure the safety, guality and efficacy of our products for our patients and consumers by ensuring that our procedures comply with Good Practice regulations. Our Good Practice Procedures for Product Quality are documented in our Quality Management System and apply everywhere we make, pack and distribute products.

Following Good Practices

Protecting patients means using a range of Good Practice guality guidelines and standards throughout our business, on site, in the lab, in the clinic or in the office. We monitor and document our work thoroughly to ensure our records are correct and complete. We also monitor our computerised systems supporting these regulated processes.

Following these steps with precision ensures that each element of the process is traceable, accountable and ready for inspection. Adhering to these guidelines helps us meet regulatory requirements. More importantly, it means our products are of the right quality and that any potential risks to patients and consumers are minimised.

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Our company

In this section, we look at how we protect our company, assets and data when we interact with our partners and suppliers.

Keywords to search for on Connect GSK



- Conflicts of interest
- Meetings and catering
- Buying goods and services
- Grant of Authority
- Gifts, hospitality and entertainment

Gifts or hospitality

Like any business, we sometimes give and accept gifts, hospitality or entertainment. In every case, we must consider if it is appropriate. Think about whether the gift or hospitality could be misunderstood or seen as a bribe. Before offering or accepting anything make sure it fits our policy, is normal in business relationships and is unlikely to influence the other person's or your own decision making.

If it is linked to a sale, seen as excessive, or seen as a bribe then do not offer or accept a gift or hospitality.

Following the right financial procedures

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GSK's financial, accounting and procurement controls are designed to ensure that we do not mislead investors, legislators, authorities and the public about financial aspects of our company.

When buying goods and services, we follow the correct procurement procedures and we have the appropriate approvals according to the Grant of Authority policy before committing to the purchase.

Treating suppliers fairly

We rely on suppliers to enable us to do business. Working with Procurement and following set processes helps ensure that we use preferred suppliers and the necessary purchase orders are raised in advance.

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Managing records properly

The way we manage records could affect our business, our patients and consumers and our reputation. That means we should safeguard personal information, keep records up to date and gather market and competitor information in the right way.

Safeguarding personal information

We have a duty to protect the personal information (PI) that we collect and retain about people to ensure it is not misused, from clinical trial patient data to employee payroll information.

All employees, complementary workers and third-party suppliers who have access to or work with PI must complete relevant training.

Keywords to search for on Connect GSK

- Privacy
- Global information and records management
- Competition law
- Data integrity

Relevant, up-to-date records and information

Good record keeping helps us protect personal information and intellectual property, comply with legal, financial and regulatory requirements, and avoid unnecessary costs. However, we should not keep records and information longer than necessary to meet regulatory and business requirements.

Collecting competitive intelligence ethically

As a company, we gather competitive intelligence ethically and in a way that meets all laws and regulations. We often use regulated specialist third-party suppliers to do this on our behalf. However, we should not seek to obtain or use information about our competitors' formulae, processes, patents, pending deals, or any other competitively sensitive information.

Data integrity

We maintain data integrity by making sure that information is accurate and stored correctly - essential, given much of our work relies on having robust data and information. As well as meeting legal and regulatory requirements it means we have accurate information when making decisions about our products, our patients and our people.



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Safeguarding GSK assets

The way we manage company assets, both tangible and intangible, is important. It includes our daily use of our technology (tech) systems and how we protect our information and intellectual property.

Keywords to search for on Connect GSK

- Acceptable use of IT
- Safeguard GSK information
- Competition law

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We are all responsible for using tech resources appropriately and professionally at all times. For example, never use cloud services and tools to create or store GSK information unless approved by our GSK Tech team. In addition, illegal or inappropriate behaviour puts GSK and personal information at risk.

We are all stewards of our reputation

The way we communicate with the outside world and internally is crucial to building trust. All communications about our business interests should be timely, accurate and reflect GSK's values and expectations, as well as follow our policies, approval procedures and all applicable laws.

Keywords to search for on Connect GSK

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- Digital communications
- Write Right

Using social media appropriately

Everyone has the right to make comments on personal social media accounts, including sharing GSK content approved for your individual use, making it clear that the opinions you express are your own. However, it's important to remember that only trained spokespeople can make comments on behalf of GSK. When using social media, we must be careful not to disclose anything that could be deemed 'inside information'. Examples could be the early release of sales figures or knowledge of a large company restructuring. GSK policies on confidential information still apply to personal social media accounts.

Using our own devices

There are GSK policies we need to follow for using our smartphones, tablets or any other personal device for GSK business purposes. We may need to set up password controls, device locking or remote erasure. Lost or stolen devices must be reported to the helpdesk immediately, and we are responsible for deleting GSK data from our devices if we dispose of them.

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Our colleagues

At GSK, we are proud to live our values and expectations and, in so doing, follow the law. We do everything we can to maintain the trust and respect of the organisations we work with and the communities in which we live and operate. This way, we protect the interests of our patients, consumers and our company.

Acting with individual integrity and courage

Integrity and courage start with individual responsibility. If we always aim to do the right thing, act honestly, ethically and openly, and speak up if something doesn't feel right, we are acting with individual integrity and courage.

Actively preventing fraud, bribery and all forms of corruption

Bribery is illegal no matter where in the world we work. It is up to us to speak up and report any suspected corruption and have open conversations to assess situations that could be open to fraud, bribery or corruption.

The GSK ABAC foundation principles (legitimacy of intent, transparency, proportionality, conflict of interest or undue influence) help us detect and prevent bribery and corruption. Read our ABAC standard to learn more about the situations that pose the highest risks.

Know – Prevent – Report

It is up to all of us to know what is expected of us, prevent bribery and corruption by complying with GSK policies and report any concerns.

Keywords to search for on **Connect GSK**



- Health and well being
- Crisis and continuity
- Anti bribery and corruption (ABAC)
- Share dealing
- Competition law

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Acting with individual integrity and courage (Continued)

Avoiding all conflicts of interest

We all need to carefully consider any situation that could be seen as not being fair. For example, it would be wrong to have family members on a supplier list.

Dealing in shares

Some of us at GSK, through our work, may have access to information which is not publicly known, and which could affect GSK's share price if it were. To trade in GSK shares when in possession of such knowledge is illegal.

Building quality into everything we do

Committing to quality means taking responsibility for improving our working practices, helping our patients and consumers, and maintaining their trust. We are passionate about quality and are always ready to learn from our mistakes as well as our successes. It is about striving to do the right thing, first time, every time and challenging ourselves to be the best we can be.

Preparing for a crisis situation

GSK prepares for possible events to protect people and help ensure that our company can survive any disruptions, including manmade or natural disasters. Please keep your contact information up to date to ensure you, or a designated contact, can be reached in an emergency or crisis situation.

Competing in accordance with competition laws

GSK is committed to free and open competition. We follow competition laws wherever we operate and compete on the merits of our products and services.

A healthy and safe workplace

Our purpose is to help people do more, feel better and live longer, including ourselves. That means creating healthy working environments that help us thrive.

Keeping safe at work

Everyone should feel safe when working for GSK. Any potential hazards, behaviours or practices that may cause harm should be reported.



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Our colleagues

We should always show respect for our colleagues and the communities around us. Everyone has a part to play in creating a fair and inclusive work environment that embraces human rights, diversity and individuality, supporting and inspiring us to achieve great things.

Keywords to search for on Connect GSK

- Pre-employment/Pre-engagement
 screening
- Complementary workers
- Managing third parties
- Inclusion and diversity

Treating people equally

When we live our values and expectations, we treat everyone with respect and on an honest, equal and inclusive basis. By doing so, we attract and retain the best people. We also reflect the diversity and characteristics of the communities in which we operate and the people we serve. We do not tolerate harassment, unwelcome, unreasonable or offensive behaviour, or discrimination of any kind. This includes any form of sexual harassment. Any such behaviour that affects an individual's dignity at work is not acceptable and will not be tolerated.

Trusting each other

To work effectively, we need to have trust in each other. That can only happen if we take extra care to ensure that people working together do so in line with our values and expectations. This applies to engagement of our complementary workforce and of our third parties, following the GSK Third Party Oversight framework.

It is never acceptable to engage with a third party where there is an undocumented conflict of interest or inappropriate benefits to yourself or the third party. If there is a situation that may involve a potential or actual conflict of interest, ask for guidance and disclose this to a manager, supervisor or an ethics and compliance officer.

Following our recruitment processes

To protect our people and assets, we carefully select people with the right qualifications and experience to work for us or on our behalf. That means we undertake pre-employment/pre-engagement screening for all employees and complementary workers before they are hired or contracted.

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Ensuring complementary workers meet our standards

Complementary workers are an important asset to our business and we benefit greatly from working with them.

We also expect those who work for or on behalf of GSK who are not employees to comply with the GSK code of conduct as a term of their engagement or contract with GSK, consistent with local labour laws or regulations and the GSK Complementary Workforce Policy.

In some markets, complementary workers will be contractually bound to comply with the GSK code of conduct. In these cases, it is the supplier's responsibility to set the specific behavioural and performance standards of its employees to comply.

Those who manage complementary workers' assignments should follow relevant GSK policies as well as local laws.

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Our world

We are honest and transparent about what we do and how we do it. This improves how we collaborate with each other and enhances the way we are seen by the communities we work with. It demonstrates that we are open to challenge and discussion and want to improve the way we operate.

We are also mindful of our responsibilities. We care about our communities and the wider world, and are committed to human rights and a sustainable approach in all that we do.

Keywords to search for on Connect GSK

- Environment, Health, Safety and Sustainability (EHS&S)
- Grants and donations
- Government officials
- Sanctions and export controls

Our commitment to human rights

Our responsibility for upholding human rights includes respecting all labour laws and ensuring we are not party to any form of forced labour.

We also commit to ensuring access to medicines and patient safety, and to sharing scientific information to help further research and development, wherever possible.

We seek to work with third parties that share our commitment to human and labour rights.

Meeting our challenging sustainability targets

If we all consider sustainability in our everyday decisions and ways of working, collectively we can make a difference. Achieving our ambitious targets to reduce carbon, water use and waste is one way we will contribute to protecting human health and our environment now and in the future.

Working with wider communities

Ensuring grants and donations are appropriate

We support legitimate and worthy causes in the communities in which we operate. We also actively promote and support public health. Anyone involved in this area has a responsibility to check whether any grants and donations made are in line with our standards.

Making sure our work with governments is ethical

We work with governments and have a responsibility to abide by our high standards and all applicable laws. Our ABAC standard sets out aspects of ethics to follow when dealing with government and non-government organisations.

No political contributions

We do not make political contributions to any individual or organisation in any country in which we operate. This helps us to operate transparently – free from any political ties - and stay focused on putting patients and consumers first.

Sanctions and export control laws

In some cases, sanctions and export control laws may restrict or prohibit us from doing business with certain countries, governments, government officials, entities and individuals.

It is each person's responsibility to understand any restrictions that apply to them and to the activities they carry out for GSK. This enables the company to follow the rules on financial transactions and the movement of our products, goods, materials, services, equipment, software and technology.

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Where to find more information?



People working for or on behalf of GSK can log onto **Our written standards** on Connect GSK to find all of GSK's corporate written standards. Use the keywords throughout this document to help you search.



Third parties may obtain more information via their GSK contact.



Individual responsibility, collective purpose

It's up to all of us, every day, to keep GSK the kind of company we can all be proud of.

Thank you for helping to put our values and expectations at the heart of every action you make and decision you take on behalf of GSK. Speak up www.gsk.com/speakup



Term	Definition
ABAC	ABAC stands for anti-bribery and corruption. Read our ABAC standard to learn more about the situations that pose the highest risks.
Accountability (GSK expectation)	Accountability is about taking ownership, prioritising work that supports our strategy and delivering what we promise.
Adverse event reporting	An adverse event is any sign of illness in a patient associated with the use of a GSK product, whether or not you think it might be related to the product. It should be raised with the Central Safety Department within 24 hours of initial awareness via an online form.
AllTrials	We were the first pharmaceutical company to sign up to the AllTrials campaign for clinical trial transparency, supporting the registration of clinical trials and the disclosure of trial results and reports.
Code of conduct	Our code of conduct applies to employees and anyone who works for or on behalf of GSK. It helps us understand the values and expectations that guide our work. It describes the behaviours we all need to demonstrate to bring our values and expectations to life. Just as importantly, it shows us how living our values and expectations helps us fulfil our purpose of helping people do more, feel better and live longer. All our written standards and procedures are available on the Our written standards resource centre on Connect GSK.
Complementary workers	People who work for or on behalf of GSK and are not employees. These include contractors, consultants and agency staff.
Conflict of interest	A conflict of interest is a situation in which an individual has competing interests or loyalties; if you think you are, or might be, in such a situation, talk to your manager.
Data integrity	We maintain data integrity by making sure that information is accurate and stored correctly, which is essential, given much of our work relies on having robust data and information.
Courage (GSK expectation)	Courage means setting high ambitions, setting an accelerated pace, making decisions even when it's difficult and speaking up when we see an opportunity to improve.
Development (GSK expectation)	Development encourages us to bring the outside in and learn from others, and to ask for and give feedback, so we can continually grow as individuals, teams and to ask as an organisation.

Term	Definition
GSK values and expectations	Our values and expectations are part of our DNA. They are at the heart of everything we do. Together they help guide us to our goal to be one of the world's most innovative, best performing and trusted healthcare companies.
Integrity (GSK value)	Our value of integrity is about how we expect the highest ethical behaviours of ourselves and others.
Our written standards resource centre	Found on Connect GSK, this is a central repository of all of our written standards.
Patient focus (GSK value)	Our value of patient focus is about always doing the right thing for patients and consumers and striving for the highest quality.
Respect (GSK value)	Our value of respect means supporting colleagues and the communities around us, and embracing diversity and individuality, so we can all achieve great things.
Retaliation	Workplace retaliation is when someone takes a negative action against a colleague for exercising their rights under employment law, e.g. speaking out. GSK has zero tolerance for retaliation.
Speaking up	Being accountable for concerns and issues that we spot by reporting or telling someone. It also includes recognising someone when they do something worthy of praise and sharing great ideas that benefit everyone.
Supplier	Suppliers are third parties who provide goods or services in return for the agreed upon compensation (traditionally fee for service basis).
Teamwork (GSK expectation)	Teamwork is about all of us working better together on aligned objectives, understanding how our work contributes to our Innovation, Performance and Trust priorities, encouraging diversity of thinking and inspiring each other.
Third party	A third party is any organisation or person that is not a GSK legal entity or employee, with which GSK has established a formal business relationship. This includes but is not exhaustive to suppliers, distributors, HCPs, licensors, etc.
Transparency (GSK value)	Our value of transparency helps us build trust with each other and with society by being honest and open about how and what we do.

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