

GSK Work with Public Policy Groups

GSK's public policy activity is dedicated to advancing a supportive environment for biomedical research that will bring new medicines and vaccines to patients around the world. To this end, we seek to work in partnership with Governments, payers, patients and other stakeholders on the development of legislative measures, policies and programmes that strike the right balance between encouraging innovation, allowing efficient management of healthcare expenditure and improving patient outcomes.

Partnering with public policy groupsⁱ is an important part of our advocacy work and choosing the right group to partner with is key. Local sensitivities will often need to be considered; however, there are certain criteria that GSK will routinely apply in selecting our partners. These include, but will not necessarily be limited to, asking if:

- the group's mission and priorities are aligned with GSK's business and reputational objectives?
- the group is aligned and consistent with GSK's values and corporate responsibility commitments?
- the research and work produced by the group is of high quality?
- the group has a good reputation and credibility with key external stakeholders?
- the group has a robust governance process, including reporting against agreed performance measures?
- we are comfortable about the other members of the group?
- we know that funds provided by GSK will not be used to make political contributions or for inappropriate or disproportionate entertainment/recreation purposes?
- we get significant, differentiated value from our membership?
- we are in other groups which serve the same purpose?

GSK need not, and almost certainly will not, support every position taken by a particular public policy group. However, care will be taken to ensure the group's work in a particular policy area unrelated to GSK will not unduly adversely impact upon the company's reputation.

Approval and Ongoing Monitoring

Decisions regarding whether to support a particular public policy group are taken at the local business unit level. They involve at least three relevant functions (eg. Government Affairs, Public Policy, Communications, Compliance, Commercial, R&D, Legal, Medical) one of which must have external-facing responsibilities. Endorsement is also sought from the local Grants and Donations Committee and decisions are reviewed at least annually at the regional level. Thereafter, once approved, the business unit owner is responsible for monitoring and reviewing GSK's support. This includes regular interaction with the group to ensure continued alignment with GSK's values, policy objectives and project scope. It also involves an annual review of the group's effectiveness in meeting GSK's expectations and providing value for money.

The focus of our efforts is to ensure GSK is working with credible and respected organisations that are aligned with our values and deliver value for money. The company will not hesitate to stop supporting an organisation if we believe it has acted contrary to patients' or shareholders' interests, or to GSK's own Code of Conduct and ethics. Going forward, the issue of GSK work with public policy groups will remain a priority for the company's Executive Team and the Board.

ⁱ No globally recognised definition of a "Public Policy Group" exists. For the purposes of GSK's approach, they are considered to be external facing, non-governmental groups (for-profit as well as non-profit) for whom shaping/influencing the public policy environment is a key activity. They can include single interest groups, groups commonly referred to as "Think Tanks", business lobbying groups and established industry Trade Associations.