

# GlaxoSmithKline Consumer Healthcare India (GSKCH)

## Corporate Policy

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# Policy on Preventing Corrupt Practices and Maintaining Standards of Documentation

Effective Date: 1 April 2014

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### What does this policy cover?

We at GlaxoSmithKline Consumer Healthcare Limited are committed to meeting the highest ethical standards in the way we do business. All of us - the company, employees and anyone acting on our behalf - must obey company policies and all laws in any country where we operate including specific anti-corruption laws.

GSKCH has zero tolerance towards bribery and corruption. GSKCH employees shall not make, offer to make, or authorise payment to a third party (e.g. sales agent, distributor or intermediary) with knowledge that all or part of the payment will be offered or given to any individual to secure an improper advantage, obtain or retain business. We are also committed to making sure all records of our business dealings are totally accurate. This means we must keep accurate records of our business dealings so we can always trace why and how we make or received payments and for what reason.

This Policy has been adopted globally and GSKCH is also adopting the same so as to comply with the highest ethical standards.

### Why should you read this?

Bribery and corruption are illegal. We are all responsible for the fight against them and for ensuring third parties do not act corruptly on our behalf. The contribution of all employees is key to ensuring compliance with the law and to ensure patients and consumers trust us and the medicines and goods we provide.

If you breach this policy you may also be breaking the law and will face disciplinary action that could lead to you losing your job, being fined and/or imprisonment.

### Anti-corruption

- Do not make – or offer to make – any improper payment or other incentives to anyone in exchange for gaining any sort of benefit.
- Payment covers anything of value, so not just cash but also gifts, services, job offers, loans, travel expenses and entertainment.
- The bottom line is that you must not offer anything to improperly influence any person, regardless of whether they are in the private or public sector, or government officials.
- GSK prohibits all facilitation payments. These are payments or gifts offered to secure or speed up a routine government decision that should take place anyway e.g. payments to customs officials to release imports or expedite official procedures.
- All payments should be made and received in the country in which the transaction takes place or the services are performed. This includes payments to agents, consultants or intermediaries. We do not allow offshore payments to or from GSK without specific written approval by an SVP of Global Finance and VP of Legal responsible for the relevant business unit.
- These prohibitions also apply to any payments or provision of anything of value by a third party on our behalf.
- This policy does not stop you doing legitimate business with people from other companies or governments in

the context of promoting products, executing contracts and exchanging scientific and medical information.

### **Document standards**

All our financial records must accurately reflect the substance of transactions, regardless of their size. In particular:

- No transaction can be authorised or funded unless the substance of the transaction is accurately recorded and disclosed in our books and records
- Payments must not be used for any purpose other than that described by the documents supporting the payment
- There must be no incomplete or misleading entries in the records, whether by leaving something out or falsifying an entry
- These rules also extend to inducing any third party with whom GSK does business to make incomplete or misleading entries in their record
- It is prohibited to pay expenses that are not supported by proper records.
- Employees are required to accurately and completely describe the substance of transactions to anyone with a legitimate reason e.g. our auditors, GSK employees investigating allegations of misconduct, and outside auditors, regulators and legal officials.
- Transactions that go across several countries create risks for economic crimes such as money laundering, evading taxes and avoiding foreign exchange controls. You must make sure the transaction structure has a sound rationale and that money can be justified. You should watch out for:
  - Cash transactions or the use of bank drafts, money orders, or cashier's cheques
  - Transactions where you cannot confirm details of the other parties
  - Payment settlements that are unusual or done with unconnected third parties
  - Use of shell companies or of companies based in tax havens or high risk countries.

You must perform sufficient risk-based due diligence prior to engaging any third party and ensure appropriate contractual clauses and oversight controls are put in place as described in the [ABAC Third Party and Business Development frameworks](#).

### **If you have a concern**

- If you hear, see or learn about anything that breaches this policy, you should report it to GSKCH Legal, Finance or a Compliance Officer.
- If you are unsure whether what you are doing or plan to do complies with this policy, you should immediately contact your line manager in the first instance.
- If you want advice on how to interpret and implement anything in this policy you must contact the Legal Department, the Compliance Officer or the Finance person responsible for your business unit.
- If you are out of compliance or feel you are unable to comply with the policy please contact your business unit Compliance Officer

### **ADMINISTRATION**

- Approval: GSKCH Board of Directors
- Sponsor: GSKCH Management Team
- Author: Compliance Officer
- Date: 1 April 2014
- History: New GSKCH India Policy