



GSK Policy		Title: Protection of GlaxoSmithKline Information
Official Short Title: Protection of GSK Information		
Key Points		
➤ GSK Proprietary information must be categorised as Confidential or Highly Confidential if improper disclosure could cause harm to GSK or individuals.		
➤ It is the responsibility of all GSK Staff to categorise and safeguard GSK Proprietary Information.		
➤ GSK Proprietary Information may not be released externally except when it has been Approved for External Release or an appropriate confidentiality agreement has been established with a third party.		
Why do we have this policy? To establish requirements for safeguarding GSK Proprietary Information and prevent harm to GSK, its shareholders or other third parties that have entrusted GSK with their information.		
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 checked="" type="checkbox"/> Communications <input type="checkbox"/> Govt. & External Affairs <input type="checkbox"/> Finance <input type="checkbox"/> Global Procurement <input type="checkbox"/> HR <input type="checkbox"/> IT <input checked="" type="checkbox"/> Legal <input type="checkbox"/> Manufacturing & Supply <input type="checkbox"/> Marketing, Sales & Support <input type="checkbox"/> Medical <input type="checkbox"/> Research / Development <input type="checkbox"/> Supervisors & Management <input type="checkbox"/> Senior Management <input type="checkbox"/> Other <input type="checkbox"/>
Glossary and Administration	Glossary Administration Waivers Error! Reference source not found.	Contacts: Corporate Ethics & Compliance 1-866-GSK Ethics



The Basics

1. Purpose

Among GSK's most valuable assets is its proprietary information. Considerable proprietary information may be known to GSK Staff (including employees, Complementary Workers students and interns) as part of their job or through GSK's aim to keep GSK Staff well informed.

The purpose of this policy is to establish requirements for safeguarding such information.

2. Scope

This policy applies to all GSK Staff worldwide, within all sectors, regions, areas and functions.

The Specifics

3. Responsibilities

IT Quality, Risk and Compliance	Provide guidance on the interpretation of and application of this policy.
Department Head	Ensure GSK Staff and relevant third-parties are aware of, and comply with, this policy.
Global Internal Audit	Perform regular audits to ensure compliance with this policy.
Compliance Officers	Agree on the business process used to establish if information is appropriately categorized as Highly Confidential. Review and concur with any exceptions to this policy. Along with the policy owner(s), review this policy annually for continued suitability for GSK and recommend any revisions.
GSK Staff	All GSK senior management, managers, employees and Complementary Workers are to comply with this policy.
Corporate Security & Investigations (CSI)	Provide best practice advice on protecting company information assets.



4. Policy

4.1. Categorisation of Information

- 4.1.1.** All information generated within or for GSK is considered GSK Proprietary Information and belongs to GSK.
- 4.1.2.** GSK Proprietary information must not be released externally unless it has been Approved for External Release, is released to a third party under an appropriate confidentiality agreement, or disclosure is otherwise required by law.
- 4.1.3.** GSK Staff who receive, create or handle GSK Proprietary Information are responsible for categorisation in accordance with the Procedures for the Protection of GlaxoSmithKline Information SOP-GSK-100.
- 4.1.4.** Any GSK Proprietary Information that could cause damage to the interests of GSK if improperly disclosed must be categorised as GSK Confidential.
- 4.1.5.** A subset of GSK Confidential Information must be categorized as GSK Highly Confidential where unauthorized disclosure could result in significant financial, reputational or regulatory impact to GSK. All determinations as to whether information is categorised as Highly Confidential shall be reviewed by the relevant Risk Management and Compliance Board with consultation from legal counsel and the Compliance Officer as appropriate.

4.2. Protection of Information

- 4.2.1.** GSK Confidential Information must be made available only to those who require access to carry out their work responsibilities in accordance with an executed confidentiality agreement.
- 4.2.2.** Disclosure of GSK Confidential Information to third parties must be preceded by execution by the recipient of a confidentiality agreement.
- 4.2.3.** The responsibility of all GSK Staff to comply with this policy survives termination of an employment or business relationship with GSK. All GSK Proprietary Information must be returned to GSK or disposed of as instructed by GSK.
- 4.2.4.** GSK Staff are responsible for the security and proper use of GSK Proprietary Information in accordance with the Procedures for the Protection of GlaxoSmithKline Information SOP-GSK-100.
- 4.2.5.** GSK Staff are forbidden from using Personally Identifiable Information or GSK Proprietary Information for other business or personal activities from which they (or others connected with them) might personally benefit.

5. Communication of Issues

- 5.1.** If GSK Confidential Information is lost or stolen, the facts must be reported immediately to the appropriate GSK senior manager and, if appropriate, to the local police. The Vice President, Global Corporate Security & Investigations must also be notified as soon as possible.
- 5.2.** GSK Staff who have knowledge of the misuse, misappropriation or unauthorized alteration or destruction of GSK Confidential Information must convey such knowledge to their manager, internal counsel, Global Internal Audit, Corporate Security & Investigations, Compliance Officer or GSK Confidential Reporting lines.

Glossary & Administration

Glossary

Key terms used are defined in the IT Glossary. For the specific purpose of this document, the following additional terms and definitions apply:

Approved for External Release	GSK Proprietary Information that has been approved for external release through a formal GSK mechanism in accordance with GSK policy External Communications to Investors and Media; External Speaking Engagements and Publications POL-GSK-301
Complementary Worker	Any individual(s), excluding GSK employees, which provide services for or on behalf of GSK. These non-GSK employee resources may include on or off-site contingent workers, professional consultants, temporary staff, vendors, service contractors, etc.
GSK Confidential Information	Any GSK Proprietary information, the unauthorised disclosure of which could cause damage to the interests of the Company. This information includes but is not limited to financial information; trade secrets such as know-how, formulae and processes; inventions; contractual information (including pending deals); customer, Personally Identifiable Information as defined in POL-GSK-010 such as patient and supplier lists and information; prices and costs; and data related to regulatory submissions, and any information entrusted to GSK by third parties (e.g., governmental agencies, joint venture partners, suppliers, etc.) which GSK management or the originator consider confidential in accordance with contractual agreements.
GSK Highly Confidential Information	A subset of GSK Confidential Information, the unauthorised disclosure of which could result in significant impact to GSK. This includes impact of a financial, reputational or regulatory nature.

	<p>This information includes but is not limited to Unpublished Price Sensitive Information as defined in GSK Policy External Communications to Investors and Media; External Speaking Engagements and Publications GSK-POL-301.</p> <p>All determinations as to whether information is categorised as GSK Highly Confidential shall be reviewed by the relevant Risk Management and Compliance Board with consultation from legal counsel or Compliance Officer as appropriate. Examples of additional information that may be deemed Highly Confidential include:</p> <ul style="list-style-type: none"> • Pre-announcement merger, acquisition, divestment and joint venture information; • Global financial results prior to public announcement to London Stock Exchange; • Intellectual property relating to a patent application prior to filing; • Product formulations and specifications; • Board and Executive Committee minutes and papers; • High level development, regulatory and marketing strategy and plans; • Sensitive Personally Identifiable Information as defined in POL-GSK-010. • Information that if disclosed could result in the delay of product release due to invalidation of a clinical trial.
GSK Proprietary Information	All information generated within or for GSK.
GSK Staff	All GSK employees and Complementary Workers, whether employed on a full or part-time basis.
Unpublished Price Sensitive Information	<p>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):</p> <ul style="list-style-type: none"> • Financial forecasts and financial results before their announcement; • Dividend information, including changes in dividend

	<p>policy;</p> <ul style="list-style-type: none"> • 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.
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Administration

Approval:	Corporate Executive Team (CET)
Owner:	GSK General Counsel, GSK Chief of Staff and GSK Chief Information Officer
Author:	GSK VP, Corporate Security & Investigations and GSK IT Quality, Risk and Compliance
Approval Date:	15-SEP-2010
Effective Date:	18-OCT-2010
History:	<p>18-OCT-2010: POL-GSK-100 v03 – updated to focus on information assets and add an additional categorisation for the most sensitive information (Highly Confidential)</p> <p>04-MAR-2002: POL-GSK-100 v02 - supersedes version 1</p> <p>19-APR-2001: POL-GSK-100 v01- New GSK policy</p>

Waivers

Any requirement of this Corporate Policy may be waived conditionally on a case-by-case basis in very exceptional circumstances, with written indication from the Corporate Compliance Officer, as approved by the policy sponsor and CET, provided that the



exception complies with local laws or statutes. 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/owner is required to notify all relevant GSK employees, contractors and third parties of the granted exception.