

## WHISTLEBLOWER POLICY

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### 1. PURPOSE

At GSK our values and expectations Patient focus, Transparency, Respect and Integrity inform everything we do. Our commitment to living these values includes having a “speak up” culture by making it easy to call out conduct that could negatively impact upon our workplace and ensuring there is a safe and secure way for individuals to disclose serious misconduct. A strong whistleblower culture will help foster an ethical workplace environment. Our Whistleblower Policy (this “Policy”) sets out the whistleblower framework for our GSK Australia group of companies. All current and former employees, suppliers, consultants, dependants and other relatives who have concerns about serious wrongdoing connected with GSK are encouraged to make a disclosure under this Policy (“Whistleblowers”).

This Policy also sets out:

- Key safeguards available to Whistleblowers in circumstances where a disclosure qualifies for protection, including from being subject to victimisation, harassment or discriminatory treatment; and
- how we will investigate concerns about serious misconduct and the protections available to Whistleblowers

You may make a report under this Policy if you have reasonable grounds to suspect that a GSK officer, employee, contractor, supplier or other person with whom GSK has business dealings (“Worker”) has engaged in activity that is reportable, as set out at section 2.

This Policy seeks to encourage and facilitate disclosures in accordance with Federal Law. By way of background, Federal Parliament enacted legislation to reduce gaps in previous statutory provisions by consolidating whistleblower laws into corporations law and creating a new protection regime for disclosing wrongdoing in the tax domain.

### 2. WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of actual or suspected Worker misconduct or wrong doing in the workplace. Misconduct erodes responsible business behaviour and can include, but is not limited to:

- Conflicts of interest
- Fraudulent activity
- Unethical behaviour that may cause harm or is prohibited by GSK policies, including corruption, bribery or blackmail
- Financial irregularity, such as misleading reporting practices or an improper state of affairs
- Illegal activity, such as criminal damage, or failure to comply with the law, for example a contravention of the Corporations Act
- Serious risks to public health or safety, such as a workplace or environmental hazard (Collectively, “Reportable Activity”)
- A “Protected Disclosure” is the reporting of Reportable Activity under this Policy that qualifies for Whistleblower protection.

Workplace matters other than Protected Disclosures are not covered by this Policy including, for example, disclosures that relate solely to personal work-related grievances, such as interpersonal conflict.

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### 3. HOW TO REPORT SUSPECTED MISCONDUCT

In order to qualify for protection, disclosable matters must be reported to the types of people (either within or outside of GSK) who are permitted to receive Protected Disclosures.

- To report suspected misconduct at GSK, disclosures can be made to recipients including:
- A member of the GlaxoSmithKline Australia or GlaxoSmithKline Consumer Senior Leadership Team including, for example, the Head of Legal, the Head of Human Resources, the Finance Director, a GSK site Director
- The GSK Speak Up Channel, providing the opportunity to make a disclosure via an independent telephone or web based channel
- Via post to:

Head of Legal  
GSK Australia Pty Ltd  
Level 4  
436 Johnston Street  
Abbotsford VIC 3067

(collectively, “Eligible Recipients”)

Outside of GSK channels an eligible discloser can also qualify for protection as a Whistleblower if:

- Information is disclosed to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the Whistleblower provisions in the Corporations Act
- Information relating to a ‘disclosable matter’ is made directly to the Australian Securities and Investment Commission (ASIC) or the Australian Prudential Regulation Authority (APRA)
- Information is disclosed for the purposes of an ‘emergency disclosure’ or ‘public interest disclosure’ as permitted under the Corporations Act

### 4. INVESTIGATING PROTECTED DISCLOSURES

GSK will investigate each disclosure received under this Policy in a fair and objective manner and as soon as possible after receipt.

Disclosures received by Eligible Recipients will be referred to the Whistleblower Triage Committee (“Triage Committee”). The Triage Committee, comprising of representation from Legal, Compliance and Human Resources, will assess each disclosure to determine whether it falls within this Policy and direct Protected Disclosures for further investigation and action in accordance with GSK’s investigations procedure (“Investigations Procedure”).

The Investigations Procedure provides the framework for managing and conducting the investigation of Protected Disclosures. This framework is designed to ensure that persons raising concerns are appropriately safeguarded and that individuals mentioned in a disclosure are treated fairly.

Findings from an investigation will be reported to the Senior Leadership Team of the relevant GSK Australian based entity and, where confidentiality allows, a summary will be provided to the Whistleblower.

GSK has appointed a Whistleblower Protection Officer for Australian based GSK sites to help ensure the efficient and effective investigation of Protected Disclosures.

The Whistleblower Protection Officer can also provide additional information on protective measures, interventions and support services available, as appropriate in the circumstances.

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### 5. WHAT PROTECTIONS ARE AVAILABLE TO WHISTLEBLOWERS?

#### 5.1 CONFIDENTIALITY

GSK is committed to the ensuring confidentiality of persons who make a disclosure under this Policy, and that those who make a report on an objectively reasonable basis are treated fairly and do not suffer any disadvantage.

If you choose to report a Protected Disclosure on an anonymous basis and, for example, adopt a pseudonym for the purposes of reporting, you will remain eligible to receive Whistleblower protections. Where legal requirements allow, GSK personnel entitled to receive information under this Policy will not divulge the discloser's identity or information likely to lead to the discovery of their identity unless the disclosure is:

- Made to ASIC, APRA or the Australian Federal Police
- Made to a lawyer for advice about whistleblowing protections
- Reasonably necessary for the purpose of investigating issues raised in a disclosure
- Made with the Whistleblower's consent

If you choose not to provide any contact information, GSK will be unable to keep you informed of the progress or outcome of investigative actions.

#### 5.2 PROTECTION FROM LIABILITY AND VICTIMISATION

Legal protections available to Whistleblowers in relation to the reporting of a Protected Disclosure include protection from civil and criminal liability, contractual remedies and protection from victimising conduct. Protections do not extend to the granting of immunity for any misconduct a discloser may have engaged in that is revealed as part of a disclosure.

It is illegal, for example, for someone to cause or threaten detriment to a person because they believe or suspect that person may have made, or could make a Protected Disclosure. Detriment includes, but is not limited to, harm or injury, dismissal from employment, disadvantageous alteration of employment conditions, intimidation, harassment, property damage or reputational damage.

Upon receipt of a Protected Disclosure, GSK will ensure the fair treatment of, and provide appropriate support for, the Whistleblower (as well as other persons involved in the disclosure). GSK will take necessary practical steps to protect Whistleblowers, such as seating a Whistleblower away from persons subject to a Whistleblower investigation.

Whistleblowers can seek compensation through a court in circumstances where loss, damage or injury is incurred in relation to making a Protected Disclosure and where GSK failed to prevent a person from causing the detriment, including for breaching a Whistleblower's confidentiality. Any reasonable administrative actions GSK may take to protect Whistleblowers will not be considered to be detrimental conduct.

Whistleblowers may wish to seek independent legal advice. This policy does not form part of the terms and conditions of any employee or officer of GSK and GSK may depart from it as necessary and appropriate in accordance with applicable law.

Existence of this policy and how it operates will be communicated to GSK on an ongoing basis and is made available on the GSK internal and external website.

**Date Effective: 1 January 2020**

**Applicable legislation:**

***Corporations Act 2001 (Cth)***

***Taxation Administration Act 1953 (Cth)***

***Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth)***