



# Promotional and Non-Promotional External Interactions

All GSK

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## Why do we have this Policy?

### Purpose

This Policy, aligned with our corporate purpose, strategy, and culture, provides principles for promotional and non-promotional external interactions so that these interactions:

- support external understanding and appropriate use of GSK products for the benefit of individual patients and populations.
- are transparent, appropriate, ethical, and comply with relevant laws, regulations and industry codes.

### Business Activities / Content Covered

We interact externally to promote our authorised products as well as to communicate for non-promotional purposes about disease, our science, and our products both before and after market authorisation. This Policy defines principles for:

- Promoting prescription products to Healthcare Professionals/Other Healthcare Staff (HCPs/OHS), and, where permitted, to the public.
- Non-promotional external interactions about our products, disease, or science.
- Payments and transfers of value to External Experts for services or to support individuals' travel and accommodation to attend certain events.
- How our Commercial and Medical functions operate with respect to these activities.

*Promotion* is any activity directed to HCPs/OHS, or, where permitted, to the public, with the intent to encourage sales, purchasing, prescribing or recommendation of an authorised prescription product. These activities include but are not limited to the use of promotional materials, promotional meetings and detailing.

GSK involvement in creating materials or organising an activity does not alone define the materials or activity as promotional.

Non-promotional activities are directed to HCPs/OHS or to the public with the intent to benefit patient care or advance science by exchanging or providing knowledge on our products and related diseases or science. Non-promotional activities include but are not limited to scientific interactions, medical information, patient support and healthcare support services, medical education, market research, advice seeking, scientific communication of our research, and disease awareness campaigns.

When this Policy refers to our “intent” for an activity, we keep in mind that our intent is judged externally. Our behaviour and our documents clearly and appropriately reflect our proper intent to an external audience.

Conducting interventional and non-interventional studies and other scientific research, interacting with regulatory authorities, communications to investors, and responding to media inquiries are not in scope of this Policy and are covered in detail by other written standards.

References within this Policy to “Medical” primarily refers to Medical Affairs and local Medical Departments but also extends to other R&D staff who engage externally in the activities in scope of the Policy and to similar roles in Global Health as well. References



to “Commercial” include other non-R&D functions as well, such as Communications & Government Affairs, who engage externally in the activities in scope of the Policy.

**Symbol Key:**

★ Critical action; 👁 Monitoring item; ⓘ Helpful tip.

## Who needs to follow it?

### Document Audience Scope

This Policy applies to all GSK staff, and those who work on our behalf, who are involved in any of the in-scope activities.

ViiV Healthcare follows its policy on promotional and non-promotional activities.

## What do you need to know / do?

### Principles

#### Key Principles

We comply with local laws, regulations, applicable binding sections of industry codes, this Policy and other applicable GSK policies (e.g. Anti-Bribery and Corruption Policy) and written standards. In the case of conflicting requirements, we follow the stricter requirement.

ⓘ We follow the IFPMA Code of Practice in countries where there is no applicable local or regional industry code.

#### Principles for Both Promotion and Non-Promotional activities

We do not act in ways that discredit or reduce confidence in GSK or our industry.

We do not offer or provide anything of financial value with the intent to influence the recommendation, prescription, purchase, supply, dispensing or administration of our products.

We do not seek to gain access to or obtain an appointment with HCPs/OHS using any inducement or deception.

Our verbal, printed and digital information and communications are:

- Clear, legible, up to date, accurate, fair, objective and balanced. Our information and communications about our products do not overstate efficacy, understate safety or make unsubstantiated comparisons.
- Based on sufficiently complete supporting data or other evidence that can be provided or referenced in support.
- Transparent about GSK’s specific involvement and disclose potential financial conflicts of interest.
- Never knowingly offensive or disparaging.

#### Principles for Promotion

We promote prescription products:



- Only after marketing authorisation.
- Only where the product has received marketing authorisation by the appropriate regulatory authority.
- Only for approved indication(s), consistent with locally approved prescribing information.
- To HCPs/OHS reasonably expected to treat patients with the product within the approved indication or otherwise be informed about the approved indication.
- Directly to the public only in countries and under circumstances permitted by local laws, regulations and applicable industry codes. This may include a public health activity such as a vaccination campaign approved by relevant authorities.

### **Principles for Non-Promotional Activities**

We engage in non-promotional external interactions:

- To increase external understanding of diseases, of our science, and of appropriate use of our products.
- To increase our understanding of diseases, of science, and use of approved products to inform and improve our work. This includes insights that inform medicine/vaccine development as well as insights relevant for approved/ marketed products.
- To support healthcare systems and patients to enhance patient care, achieve better health outcomes, or improve healthcare delivery.

Non-promotional external interactions can be initiated by GSK or be responsive to an external request. When we provide information on a product as part of the interaction, we do so in ways that comply with local laws, regulations and applicable industry codes that apply to non-promotional product information.

ⓘ Some local regulations or industry codes may require certain non-promotional activities, such as medical education that includes information about a product, to meet specified requirements, such as including approved prescribing information or safety information. These requirements alone do not change the non-promotional intent of the activity.

We do not use non-promotional external interactions as a means of disguised promotion. We avoid any perception of promotion in connection with non-promotional activities, especially when we initiate the interaction.

We do not suggest or request as part of a non-promotional interaction that our products be prescribed. Our non-promotional interactions are not designed or conducted to increase sales, purchase, prescription or recommendations of the use of our products.

### **Principles for Engaging with External Experts for Services**

We engage with *External Experts* as investigators, authors, scientific advisors, patient advisors, speakers, and other services vital to the development and delivery of our products.



We only engage an External Expert when there is a legitimate need for their services. We select specific External Experts based solely on their qualifications to provide the needed services. We identify and manage potential conflicts of interest. We ensure that a written agreement is in place before work is started.

### **Paying External Experts for Services**

We pay External Experts for services based on an assessment of fair market value for the services provided.

We disclose payments and transfers of value publicly or to relevant authorities where required by local laws, regulations and applicable industry codes.

We may pay an External Expert for non-promotional services, including consultancy or facilitation of scientific workshops.

We may pay selected External Experts to speak on our behalf about our medicines or associated diseases during promotional events when there is a heightened need for education at certain times in a product lifecycle.

We do not pay External Experts if payment is prohibited by our Anti-Bribery and Corruption Policy.

### **Financial Support to Attend Events**

We do not provide direct financial support to individuals to attend medical congresses or associated satellite symposia as delegates.

We may provide indirect support for individuals to travel and attend medical congresses by providing funds to the congress organiser or other independent third parties to whom individuals can apply for support. We do not select or influence the selection of individual recipients of support.

In countries where we may pay an HCP for services for selected promotional programmes, we may also fund and arrange travel and accommodation within a country for invited delegates to attend our stand-alone promotional meetings.

## **Accountability and Decision-Making for Promotional and Non-Promotional Activities**

### **Commercial – Medical Roles**

Commercial and Medical staff collaborate to develop GSK's overall strategy for our portfolio, disease areas, and products, with a common goal to benefit patients and to deliver our strategic ambition. Commercial and Medical also work together or independently, within defined roles and accountabilities, to deliver specific promotional and non-promotional activities. This relationship between Commercial and Medical requires mutual respect for each function's role, expertise, accountabilities and independence:

- Commercial staff decide and are accountable for promotional direction and content. Commercial staff also are accountable for and conduct non-promotional commercial activities where allowed by local laws, regulations, and industry codes and not restricted by our written standards for those activities.



- Medical staff are accountable for and conduct non-promotional medical activities.
- Medical staff do not conduct promotional activities.
- In exceptional and rare circumstances, a qualified office-based Medical staff member may be permitted to conduct a promotional presentation on a product. These presentations are:
  - Justified by a strong rationale for why the presentation should be done and why an alternative speaker is not available or qualified, and permitted at the discretion of the Country Medical Director for the market as decision maker;
  - Only within the first year of the product's launch in that market;
  - Only in conjunction with an international congress;
  - Scientific in nature and tone, consistent with Medical's usual non-promotional role; and
  - Management monitored for the rationale for and frequency of these events.
- As part of review processes, Medical staff independently approve or disapprove promotional or non-promotional content based on data and scientific/medical reasons.
- Commercial staff do not control, direct, or coerce Medical staff to approve promotional content, to conduct or not conduct non-promotional medical activities, or to set and achieve particular metrics.

Potential violations of this Policy, other company written standards, legal, or regulatory requirements are formally investigated and can lead to disciplinary actions, up to and including termination.

### **Accountability**

We may plan promotional and non-promotional activities globally, regionally, or locally. In doing so, we make decisions at the appropriate level of our organisation and within our matrix structure of local operating companies, regional functions, and global functions. We expect staff to use good judgment, to consult internal business partners and subject matter experts when appropriate, and to escalate significant issues. When an activity requires approval, the individual business owner proposing the activity does not also approve the activity.

While each decision-maker is accountable for their decisions, we also make certain senior leader roles accountable for overseeing these decisions and the resulting promotional or non-promotional activities as applicable under their defined roles. These roles include, without being limited to:

- Local operating company General Managers and Country Medical Directors.
- Regional Commercial Heads and Regional Medical Directors.
- Medicine/Vaccine Commercial Leads, and Global Product Strategy Heads.
- Early Development Leads, Medicine/Vaccine Development Leads, Global Medical Affairs Leads, and Global Medical Therapy Area Heads.

Within a country, the General Manager is accountable for promotional and non-promotional commercial activities and the Country Medical Director is accountable for



non-promotional medical activities (including globally or regionally planned activities), following company policies and local legal and regulatory requirements. The General Manager may suspend or end an activity in their country at any time if they believe the activity is locally prohibited or unacceptably risks action against the local company.

Ultimately, the Chief Commercial Officer is accountable for promotional and non-promotional commercial activities, the Chief Medical Officer is accountable for medical governance, and the Global Medical Affairs Head is accountable for the execution and delivery of non-promotional medical activities.

### **Decision Making**

We apply the principles in this Policy and we follow related processes to mitigate key risks, such as inappropriate promotion, bribery and corruption, and inappropriate payments to third party individuals/organisations.

When we make decisions in grey areas that are not clearly directed by our internal written standards or external authority, we apply our ethical principles and consult with business partners and subject matter experts as appropriate to make the decision.

In addition, we encourage staff to consider:

- **Timing:** The need for the activity at the time is clear. The status of marketing authorisation, availability of data for external use, and the alignment with other GSK or external events are considered before each activity.
- **Intent:** Our intent is to either strengthen knowledge (including about our products) through non-promotional activities, or to promote our products, and this distinction is made clear to the external audience. The need for a promotional or non-promotional activity is clearly specified and documented as part of a defined approval process.
- **Proportionality:** The scale and frequency of each activity are appropriate for the need, as are the selection of presenters, advisors and participants.
- **Perception:** Non-promotional activities are designed and conducted to avoid a risk of being perceived to be promotional and our promotional activities are not disguised. There is no undue influence or hidden conflict of interest.



## What monitoring is required for this policy?

GSK's Internal Control Framework (ICF) requires that management have appropriate monitoring in place to address and reduce company risks. GSK's Enterprise Risk Plans (as adapted by businesses and functions) outline monitoring expectations for management to facilitate effective risk management.

Questions on risk management and monitoring can be raised to your business area Ethics & Compliance Business Partner, the Enterprise Risk Management Team in Global Ethics and Compliance, your embedded risk management group (if applicable), or the aligned Enterprise/ Business/Function Risk Owners.

## Where to raise questions, concerns or exceptions

If you are unsure about how to apply this policy, or feel you need to raise an exception to it please bring this to the attention of a manager or supervisor.



If you see any violations of this company policy, please report it through the appropriate Speak Up channels. To find your local Speak Up integrity line number or to report online, please visit: [www.gsk.com/speakup](http://www.gsk.com/speakup)

## Version History and Changes

Current Version:	Effective March 13, 2024, replaces the previous version dated November 11, 2020. Changes since last revision: <ul style="list-style-type: none"><li>– Text revised for style and updated company terminology.</li><li>– Added content on Commercial-Medical Roles.</li></ul>
Document Alias:	None
Records Retention:	Retain versions in accordance with GSK Records Retention Schedule unless overridden by an active Legal Preservation Notices.