



GSK Modern Slavery Act Statement 2023

Introduction

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth) and subparagraph 11(4)(b)(ii) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and is published on behalf of GSK plc and its group companies. The reporting entities covered by this single joint statement are listed in the Annex. Both GSK plc and its group companies will be collectively referred to as “GSK” or “Group” for the purpose of this statement.

This statement refers to the financial year ending 31 December 2023 and sets out the steps we have taken to address modern slavery risks in our business and supply chains. Our previous statements can be read [here](#).

GSK’s structure, business and supply chains

GSK is a global biopharma company headquartered in the United Kingdom. We prioritise innovation in vaccines and specialty medicines, maximising the increasing opportunities to prevent and treat disease. At the heart of this is our R&D focus on the science of the immune system, human genetics and advanced technologies, and our world-leading capabilities in vaccines and medicines development. We focus on four core therapeutic areas: infectious diseases, HIV, respiratory/immunology and oncology. Information on our range of products can be found [here](#) and a full list of GSK’s principal subsidiaries is available in our [Annual Report](#).

In 2023, we delivered 1.8 billion packs of medicines and over 500 million doses of vaccines. Turnover was £30.3 billion in 2023. The US represents our largest single commercial market, followed by International and Europe. We employ over 70,000 employees in more than 75 countries. We also have workers who are not directly employed by GSK who are known as complementary workers and are a vital part of our workforce.

We have global commercial operations, with our main research & development centres based in Europe and the US. Our manufacturing network includes 37 sites in 17 countries. Further information on our business can be found in our [Annual Report](#).

GSK’s supply chains are complex and have significant scale. In 2023, we spent over £14 billion with over 22,000 third parties that provide us with:

- Goods and services that are required for our research and development activities such as clinical trial support and laboratory equipment and supplies.
- Goods and services that we use to manufacture, store and deliver our products such as raw materials, pharmaceutical ingredients, bottles, tubes and packaging materials, warehousing and transportation.
- Goods and services that are required to run our business, including IT, marketing and other agency support,
- Catering and facilities management, engineering and construction services.
- We also partner with a network of external contract manufacturing organisations that supply finished and semi-finished products for sale and distribution by GSK such as tablets, ointments, inhalers and syringes.

We provide our supplier spend, broken down by region in our [ESG report](#).

Policies

Our Code reflects our purpose to unite science, technology and talent to get ahead of disease together and sets out the commitments we make as a company and to each other to deliver on our purpose and ambitions. It sets out the core standards and ethical behaviours that employees and complementary workers should apply in their daily work and embeds respect for human rights and labour rights across the business. In 2023, we strengthened our [Human](#)



[rights position statement](#) by providing more detail on our human rights governance process and approach to human rights due diligence.

The Code is underpinned by several global policies and standard operating procedures that help to mitigate against the risk of modern slavery:

- Our [Human Rights Policy](#) sets out our commitment to conduct business with respect for international human rights standards.
- Our Global Employment Guidelines and [Working with Third Parties Policy](#) set out the minimum standards for our own employment practices and those expected of our third-party partners. They are based on international standards, including the International Labour Organization core conventions, and prohibit any form of forced labour or child labour. They also make clear our expectation that no worker should pay for a job.
- Our Standard Operating Procedure for Safeguarding and Non-retaliation defines our approach to protecting and supporting individuals who work for GSK and report concerns of significant misconduct in good faith (including exploitative labour practices).
- Other relevant policies include those on Equal and Inclusive Treatment of Employees, Pre-employment Screening, [Conflict Minerals](#), [Environmental Sustainability](#) and [Anti-bribery and Corruption](#).

Assessment of modern slavery risk

To assess modern slavery risk, we refer to external data sources (e.g. Alliance 8.7 Global Estimates of Modern Slavery and the US State Department's list of goods produced by child and forced labour), engage with our peers and consult with external experts. To identify the business activities with greater exposure to modern slavery risk, we consider the following factors:

- Reliance on low skilled workforce
- Dangerous or undesirable work
- Presence of migrant workers
- Presence of labour intermediaries
- Offshore production
- Long, complex, or non-transparent supply chains
- Presence of child labour
- Country risks i.e. poverty, conflict, weak enforcement of international human rights standards

We believe that the risk of modern slavery in our directly employed workforce is low. This is due to the highly regulated nature of our industry, our employees being largely educated or skilled, or undertaking work in controlled environments where there are established policies and processes. Our exposure to the risk of modern slavery increases when we engage with third parties, particularly in categories such as catering, cleaning, transportation, protective equipment and clothing, warehousing, construction, manufacturing, packaging and promotional goods suppliers. Through our assessments, we have not identified any cases of forced or child labour being used in our activities or our supply chain.

We recognise the increased risk of modern slavery associated with sourcing specific raw materials. We have developed a set of ambitious Sustainable Sourcing standards, introduced in 2022, for agricultural, marine-derived and forestry products, in consultation with third-party experts. These standards encompass mandatory labour and human rights criteria, alongside environmental and governance requirements. So far, through engaging with our suppliers and mapping their supply chains, we have developed plans for implementing these standards across our 24 highest risk materials.

In 2023, we started to implement these plans and conducted our first sustainable sourcing audits. We also conducted desktop evaluations of our pilot commodity supply chains to identify gaps against the standards. For the assessments completed, no significant gaps were identified against the GSK standards and we are working with our



tier-1 suppliers to close minor gaps identified. Moving forward to 2024, we will expand this implementation by conducting more on-site audits and desktop assessments and prioritising procurement of materials certified under standards that align with our own ones. In addition, we are supporting the Pharmaceutical Supply Chain Initiative (PSCI), to establish a standardised approach to sustainable sourcing across the industry, to ensure consistency and alleviate the burden on suppliers.

Due diligence processes

Our approach to managing the risk of modern slavery forms part of our broader efforts to respect human rights.

Governance

GSK's Corporate Responsibility Committee (CRC) has oversight of human rights issues on behalf of GSK's Board. A central human rights team works with a cross-business Human Rights Steering Group (HRSG) comprising senior representatives from across the business including legal and compliance, procurement, sustainability and corporate affairs to oversee our approach to addressing human rights risks, including modern slavery. This group meets regularly throughout the year to coordinate action and share information. The HRSG is facilitated and attended by external human rights experts and is an opportunity to identify areas where we can strengthen our capability on human rights, both in raising awareness across the business on our commitments and in providing function-specific training. During 2023 the HRSG met four times. Each meeting included an update on the changing regulatory and human rights landscape, including modern slavery risks, as well as specific topic areas such as Grievance mechanisms and Stakeholder engagement. The HRSG reports to GSK's Leadership Team, led by our CEO, and the CRC of the GSK board annually.

We regularly carry out human rights risk assessments across the business and have introduced systems to support all business functions to both identify their salient human rights issues and determine appropriate actions in response. Through two company-wide assessments we have identified our most salient overarching human rights areas as access to healthcare; research practices; patient safety; environment; health and safety; labour rights; and privacy. Building on this and through benchmarking exercises, in 2021 we commissioned an independent assessment of how we manage human rights issues and worked with business functions to develop their own human rights action plans. Each business function has subsequently established its priorities on human rights issues and these are reviewed on a yearly basis.

Embedding respect for human rights

Everyone at GSK must complete training on what the company expects from them. This includes global mandatory learning curriculum called "Living our Code", which comprises three modules: "The Code", "Creating an Inclusive Workplace" and "Protecting GSK". Protecting GSK focuses on key risk areas such as anti-bribery and corruption (ABAC), cybersecurity, privacy as well as Speak-Up processes. In 2023, 100% of employees and 99% of complementary workers completed this training.

Our Culture Assurance programme assesses the business against a framework describing expected behaviours and ways of working and provides reporting on how well our culture supports both performance and management of risks. We use centrally sourced data to identify areas where there may be issues linked to culture, e.g. high attrition, absenteeism, Speak-Ups and investigations. We then conduct individual discussions with randomly selected employees and complementary workers across multiple countries where issues – including labour rights violations – can be raised and ensure concerns are addressed. In 2023, 10 reviews took place covering a wide range of working practices, such as equal and inclusive treatment, employment practices and health and wellbeing. There were no signals suggestive of modern slavery.



Overseeing third parties

We aim to work with third parties that share our values and work to the ethical and business standards expected by GSK. Our global Third Party Risk Management (TPRM) programme enables us to identify labour rights risks before entering contracts with third parties. We work with [EcoVadis](#), an independent sustainability ratings service, to evaluate the management systems of high risk third parties, to ensure they meet the principles set out in our Working with Third Parties Policy. The assessment is tailored to the third party's industry, size and location and covers labour and human rights, environment, ethics, and sustainable procurement.

In 2023, over 12,165 third parties underwent a risk assessment through the TPRM programme. Of these, 518 were rated as high risk for labour rights and these were addressed through appropriate contract clauses and monitoring. We completed EcoVadis assessments on 125 of the highest risk suppliers and, of those, 86% achieved at least the minimum score we expect or had an improvement plan in place. We are engaged with the remaining third parties who are required to take action to address shortcomings.

We conduct audits and site visits focusing on Active Pharmaceutical Ingredients (API) manufacturers and contract manufacturing suppliers. No incidents of modern slavery were identified through these engagements. In 2023, we worked with our external audit partner to continue to enhance labour rights capabilities and we entered a second partnership with an audit company with strong capabilities in labour rights auditing. Together with these partners we completed 41 audits covering environment, health and safety, and labour rights. 15 major findings of labour rights non-compliance were found at 15 different suppliers: five in the Asia Pacific region, five in India, three in Europe and two in the Americas, for issues related to policies, working hours and overtime wages. Corrective action plans to address major findings are tracked and followed up through engagement activities. This includes verification of corrective actions and engagement meetings with key third parties. Six corrective action plans have been implemented, verified and closed. Four further corrective action plans are in progress, with one more under development following their audit in December 2023. The final four findings are no longer being tracked due to suppliers being placed on hold, or a discontinuation of the relationship with the existing or prospective supplier. Sites are re-audited on a frequency proportionate to the risk they pose.

We also conduct regular site visits for our priority suppliers¹ and labour rights checks are integrated into these visits. We have continued to develop the labour rights capabilities of our employees who conduct these visits. Seven incidents of labour rights non-compliance were found: four in India and three in China, for issues relating to policies, wages and discrimination. Actions are tracked and followed up through our engagement work with six corrective action plans completed and one remaining in progress.

We aim to drive continuous improvement, however if we see no significant ongoing reduction in labour rights risk, where performance is poor, we may choose to suspend or terminate work with a third-party.

Collaboration & Training

We seek continuous improvements in our approach to identifying and addressing modern slavery risks. We have developed practical guidance to enhance supplier visits and develop and implement corrective action plans related to labour and human rights non-compliances. To support this guidance, labour rights training is delivered to EHS and procurement employees to better equip them to spot human rights issues when visiting suppliers.

In 2023, we also carried out human rights training for priority suppliers, aimed at ensuring they meet GSK's requirements and aligned with international human rights standards. This started with suppliers based in China and India and we plan to expand it globally in 2024.

¹ Our largest suppliers, including those who supply globally medically critical products, are critical to our R&D, and those largest by spend.



We also invest and participate in industry and cross-industry collaboration including Action for Sustainable Derivatives, Business for Social Responsibility's Human Rights Working Group and the PSCI's Human Rights and Labour Sub-Committee. Through our participation in the PSCI, we contributed to a number of projects to collectively build members' and suppliers' capability to address human rights in 2023, including:

- Published guidance for members and suppliers on human rights due diligence and trade sanctions
- Completed a benchmark of certification schemes for the responsible procurement of aluminium, cellulose, and cane sugar and a series of webinars for members and suppliers on the responsible procurement of these materials.
- Delivered a recorded webinar training on Human Rights and Labour for suppliers in India and South Asia
- Delivered a series of recorded webinars for PSCI members and suppliers on the latest developments in business and human rights, covering legal and political developments.

Reporting and investigating concerns

We want to maintain an open environment where people feel confident to raise concerns about possible breaches of our Code of Conduct or suspected violations of country laws and regulations. Anyone within or outside GSK can raise issues or speak to an independent third party through our [Speak Up](#) webform offered in 49 languages or Call Centre through one of our 97 in-country phone lines. GSK is committed to promptly investigating all reports of unethical, illegal or inappropriate activity. In 2023, there were no reports suggestive of modern slavery. More information on policy violations that took place in 2023 can be found in our [Annual Report](#). We will continue to track the effectiveness of this channel and seek to identify other rightsholders who may be less able to access it and bring appropriate remedial actions to our attention.

Measuring Effectiveness

We review the effectiveness of our modern slavery risk management programme by assessing our suppliers' ability to detect and mitigate modern slavery risk, investigation and analysis of reports of modern slavery and remediation actions taken in response and engaging regularly and collaborating with stakeholders. We recognise that as a complex and hidden issue, modern slavery requires more effort to uncover, particularly in lower tiers of supply. As we continue our due diligence activities, we will consider the need for additional ways to assess the effectiveness of our actions.

Consultation and approval process

The GSK Group operates through global policies, systems and processes that are designed to be consistently applied across the Group including in the area of third-party oversight, audit processes and contract governance. This statement has been prepared in consultation with our key teams that collaborate to deliver our labour rights risk identification, assessment and management processes for our own operations and supply chain. This includes: corporate responsibility; third party risk management; third party environment, health & safety; human resources; ethics & compliance; procurement, and legal teams.

Members of the GSK plc and GSK Australia executive teams considered and provided comments on this statement prior to publication. This statement was approved by the GSK plc Board of Directors.

A handwritten signature in black ink, appearing to be 'JB', is positioned above the name and title of the signatory.

Julie Brown
Chief Financial Officer

1st March 2024



Annex

This statement applies to GSK plc and all entities within the GSK Group of companies as set out below.

Reporting entity:

GSK plc (registered in England and Wales No. 3888792). 980 Great West Road, Brentford, Middlesex, TW8 9GS, United Kingdom.

In accordance with the UK Modern Slavery Act 2015, the following GSK plc UK entities are included in this statement:

Glaxo Operations UK Limited
GlaxoSmithKline Export Limited
GlaxoSmithKline Intellectual Property (No.2) Limited
GlaxoSmithKline Intellectual Property (No.4) Limited
GlaxoSmithKline Intellectual Property Development Limited
GlaxoSmithKline Intellectual Property Limited
GlaxoSmithKline Intellectual Property Management Limited
GlaxoSmithKline Research & Development Limited
GlaxoSmithKline Services Unlimited
GlaxoSmithKline Trading Services Ltd
GlaxoSmithKline UK Limited
GlaxoSmithKline US Trading Ltd
Glaxo Wellcome UK Ltd
SmithKline Beecham Limited
ViiV Healthcare Trading Services UK Limited
ViiV Healthcare UK Limited
ViiV Healthcare UK (No.3) Limited
ViiV Healthcare UK (No. 4) Limited

In accordance with the Australian Modern Slavery Act 2018, the following GSK plc Australian entities are included in this statement:

GlaxoSmithKline Australia Pty Ltd
GlaxoSmithKline Holdings Pty Ltd
GlaxoSmithKline Investments Pty Ltd

In accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9, the following GSK plc Canadian entities are included in this statement:

GlaxoSmithKline Inc.
ViiV Healthcare ULC
ID Biomedical Corporation of Quebec / Corporation ID Biomédical du Québec
