



## GSK Modern Slavery Act Statement 2024

### 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 2024 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 prevent and treat disease with specialty medicines, vaccines and general medicines. We focus on the science of the immune system and advanced technologies, investing in four core therapeutic areas – respiratory, immunology and inflammation; oncology; HIV; and infectious diseases – to impact health at scale.

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 2024, we delivered 1.7 billion packs of medicines and over 409 million doses of vaccines. Turnover was £31.4 billion in 2024. The US represents our largest single commercial market, followed by International and Europe. We employ over 68,600 employees in 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 US, UK and Belgium. 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 2024, we spent over £14 billion with over 18,000 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, inhalers and syringes.

We provide our supplier spend, broken down by region in our [Responsible Business 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.

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 and provides more detail on our human rights governance process and approach to human rights due diligence.
- 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 Organisation core conventions, and prohibit any form of forced labour or child labour. They also make clear our expectation that no worker should pay recruitment fees to secure 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 raw materials, logistics and warehousing, transportation, protective equipment and clothing, construction, catering, cleaning, manufacturing, packaging and promotional goods suppliers.

## Sustainable sourcing

We recognise the increased risk of modern slavery associated with sourcing specific raw materials. In 2022 we introduced a set of sustainable sourcing standards 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 12 key materials.



Since we started to implement these plans last year, we have worked with an independent assessor to conduct 6 pilot on-site sustainable sourcing audits, and we are working with our suppliers to close minor gaps identified. We are currently undergoing our first bi-annual refresh of the standards, taking input from internal and external subject matter experts. In addition, we have been 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. Through this initiative, we have collaborated with peers to agree industry sustainable sourcing requirements for palm oil and lactose aligned with international best practice on labour rights.

### **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 team works with a cross-business Human Rights Steering Group (HRSB) 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 HRSB 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 2024 the HRSB met three 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 HRSB reports to relevant members of GSK's Leadership Team and the CRC of the GSK board annually.

We periodically carry out company-wide human rights risk assessments to identify our most significant human rights risks. In 2024, we updated our risk assessment to refresh our salient issues – those areas where GSK's potential to impact on human rights is greatest – and to better understand where our operations, subsidiaries and supply chain may potentially adversely impact individuals and communities. As part of this process, we engaged NGOs and patient representative groups identified by GSK's Human Rights Steering Group to give their perspectives on the proposed issues. All those consulted confirmed that the proposed updates provided greater clarity on the potential human rights risks relevant to GSK. Our refreshed salient issues are: healthcare access and affordability, safety of patients and trial participants, working conditions, environmental health impacts, and artificial intelligence and data protection. Building on this updated view and supporting insights, we are helping key business functions to both identify and act on their most significant human rights issues and will continue to work with them to develop business area specific human rights action plans. Each business function's priorities on human rights issues, proposed actions and progress against 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 2024, 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 focus groups with complementary workers across multiple countries where issues – including labour rights violations – can be raised and ensure concerns are addressed. In 2024, 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 2024, over 12,500 third parties underwent a risk assessment through the TPRM programme. Of these, 528 were rated as high risk for labour rights and these were addressed through appropriate contract clauses and monitoring. We completed EcoVadis assessments on 123 of our highest risk direct suppliers and, of those, 86% (exceeding our target of 80%) have either met the minimum score we expect or have 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. Last year we worked with our external audit partner to continue to enhance labour rights capabilities and entered a second partnership with an audit company with strong capabilities in labour rights auditing. Together with these partners we completed 39 audits in 2024 covering environment, health and safety, and labour rights. 12 major findings of labour rights non-compliance were reported at 12 different suppliers: 2 in the Asia Pacific region, 4 in India, 4 in the Europe, Middle East & Africa region and 2 in the Americas, for issues related to policy adherence, provision of fair wages and working time, delayed wage payments and excessive overtime. 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. Four corrective action plans have been implemented, verified and closed. Eight further corrective action plans are in progress. Sites are re-audited on a frequency proportionate to the risk they pose.

We also conduct regular site visits for our priority suppliers<sup>1</sup> 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. Two incidents of labour rights non-compliance were found in China, for issues relating to policies, wages and discrimination. Actions are tracked and followed up through our engagement work and all corrective actions have now been completed.

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

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<sup>1</sup> Our largest suppliers, including those who supply globally medically critical products and active pharmaceutical ingredients, are critical to our R&D, and those largest by spend.



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 2024, we refreshed our human rights training for priority suppliers aimed at ensuring a good understanding of human rights and labour principles, aligned with international standards, as well as our human rights training for third-party engagement leads, to better equip them to spot labour and human rights issues when visiting suppliers.

We also invest and participate in industry and cross-industry collaborations including Action for Sustainable Derivatives Business for Social Responsibility's Human Rights Working Group and the PSCI's Human Rights and Labour Sub-Committee. This year the PSCI, of which GSK is a member, has delivered several projects to collectively build members' and suppliers' capability to address human rights:

- Refreshed PSCI Human Rights Maturity Model, to help suppliers assess their own maturity against PSCI Human Rights Principles and identify progress pathways.
- Facilitated series of roundtables, recorded webinars, and conference sessions for PSCI members and suppliers on key human rights issues and related legislation for the pharmaceutical industry.
- Hosted quarterly meetings to share the latest developments in the business and human rights space and engage PSCI members in deep dives into key aspects of human rights due diligence.

### 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 20 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 2024, there were no Speak Up reports suggestive of modern slavery. More information on policy violations that took place in 2024 can be found in our [Responsible Business 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 continue to review the effectiveness of our Third Party Risk Management programme by assessing our high-risk suppliers' ability to detect, mitigate and report modern slavery and related labour rights risks, including the outcomes of any investigations and remedial actions taken in response. We recognise that as a complex and hidden issue, modern slavery requires more effort to uncover, particularly in lower tiers of our supply chain. As we continue our due diligence activities, we will consider the need for additional ways to assess potential risks alongside the effectiveness of our actions and will continue to engage and collaborate with suppliers and external experts to enhance current approaches.

### 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 areas 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, GSK Australia and GSK Canada 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 centered on a light gray rectangular background. The signature is fluid and cursive.

Julie Brown  
Chief Financial Officer

27<sup>th</sup> February 2025



## 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  
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