



GSK Modern Slavery Act Statement 2025

Introduction

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cath) 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 2025 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 focused 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 2025, we delivered 1.64 billion packs of medicines and over 389 million doses of vaccines. Turnover was £32.7 billion in 2025. The US represents our largest single commercial market, followed by International and Europe. We employ over 66,800 people in 70 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, and our manufacturing network includes 33 sites. Further information on our business can be found in our [Annual Report](#).

GSK’s supply chains are complex and have significant scale. In 2025, we spent over £14.5 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 of Conduct (The Code) guides our people to do the right thing and act on any concerns they have. We expect everyone who works for us to live up to this, and we expect the same of our suppliers. It sets out the core standards and ethical behaviours that employees and complementary workers should apply in their daily work, including respecting 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 and local people policies 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

In 2025, we updated our modern slavery risk assessment to further validate risks and identify highest risk sectors, goods and services, materials and countries to help minimise potential negative impacts while supporting increasing global regulatory requirements. This work helped to identify priority areas for more targeted due diligence and to introduce additional preventative measures if necessary, proportionate to the risk exposure.

We assessed modern slavery risks across our operations, suppliers and raw materials combining quantitative sources (e.g., Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor) with qualitative research to better understand the nature of the risks and assign an appropriate risk rating. We also engaged with peers and consulted with external experts to help validate our findings.

To identify the business activities with greatest exposure to modern slavery risk, we considered the following risk factors:

- Reliance on low skilled workforce
- Dangerous or undesirable work
- Presence of migrant workers
- Presence of labour intermediaries
- 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 remains low. This is due to the highly regulated nature of our industry and our largely educated and skilled workforce operating in controlled environments with established policies and processes. Risks potentially increase however, across our contracted workforce in some countries. Our exposure to the risk of modern slavery also increases when we engage with third parties, particularly in areas such as raw materials, logistics and warehousing, transportation, protective equipment and clothing, capital construction, staffing services (contingent workers), facilities services (cleaning, security, maintenance), and clinical trial support services. Risks are also greater in some regions where there are limited human rights protections and inconsistent enforcement.



Sustainable sourcing for key raw materials

We recognise the increased risk of modern slavery associated with sourcing specific raw materials, particularly naturally-derived materials that are important to our business. Since 2022, we have had Sustainable Sourcing Standards in place for 12 key materials which include labour rights criteria to help reduce the risks of forced labour or modern slavery. We define sustainable sourcing as purchasing certified materials that align with GSK's standards, or auditing suppliers against these standards in the absence of appropriate accreditations. Our aim is that 100% of these 12 key naturally-derived materials are sustainably sourced and deforestation-free by 2030.

In 2025, 50% of our key naturally-derived materials were sustainably sourced and deforestation free. We also met our commitment to have 100% of our palm oil RSPO Certified in 2025, one of the highest risk materials globally due to widespread forced labour issues in regions with weak enforcement of labour laws, including the exploitation of underage and migrant workers.

Due diligence processes

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

Company-wide human rights risk assessments

We periodically carry out company-wide human rights risk assessments to identify our most significant human rights risks, most recently in 2024. Our salient issues are healthcare access and affordability, safety of patients and trial participants, working conditions, environmental health impacts (such as potential negative health consequences for local communities due to contamination from manufacturing), and artificial intelligence and data protection.

In 2025, we reviewed existing safeguards and controls for these salient issues across key business functions. The review found that potential risks are currently well managed and we are working to address emerging risks. We also reviewed labour rights risk management for direct suppliers across the business and made prioritised, actionable recommendations to enhance due diligence. This included enhancing co-ordination and escalation processes between teams to support the timely resolution of potential indicators of modern slavery

Building on these insights, we continue to support key business functions in identifying and acting on their most significant modern slavery and forced labour risks through tailored action plans while helping them with further integration into risk management and business practices. Each business function's priorities on human rights issues, actions and progress are reviewed annually.

Embedding respect for human rights

Everyone at GSK and our suppliers must complete training on what the company expects from them. This includes a global mandatory learning curriculum on The Code. The training comprises two modules: "The Code" and "Living our Code" addressing key risk areas including human safety information related to our products, responsible use of AI, cybersecurity and data privacy, conduct at work and Speak-Up processes. In 2025, 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, engagement scores and 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 2025, 9 reviews took place covering R&D, Commercial, Supply chain and central functions. 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 assess if 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 2025, 12,000 third parties underwent a risk assessment through the TPRM programme. Of these, 629 were rated as high risk for labour rights and were addressed through appropriate contract clauses and monitoring. We completed EcoVadis assessments on 118 of our highest risk direct suppliers and, of those, 92% (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 regularly conduct audits covering labour rights as part of our environmental health and safety audit programme, focusing on Active Pharmaceutical Ingredients (API) manufacturers and contract manufacturing suppliers. Together with our external audit partners we completed 38 audits in 2025 covering environment, health and safety, and labour rights.

In 2025, 11 major findings of labour rights non-compliance were reported at 11 different suppliers: 10 in the Asia Pacific region and 1 in the Americas. Identified issues included following policies and procedures, providing fair pay and hours, delayed wage payments, excessive overtime, employment records, and grievance mechanisms. Corrective actions to address these major findings include updates to policies and management systems, payroll system improvements, and back pay contributions. Corrective action plans are tracked and followed up through engagement activities including verification of corrective actions and engagement meetings with key third parties. Six corrective action plans have been implemented, verified and closed. Five further corrective action plans are in progress and are on track to be completed by mid-2026. Sites are re-audited on a frequency proportionate to the risk they pose.

This year, we also conducted a dedicated labour and social follow-up audit at a supplier where previous inconclusive audit findings potentially indicated the presence of forced labour practices. This in-depth audit confirmed no evidence of forced labour or other modern slavery indicators and found that the facility is committed to compliance with our standards and actively pursues continuous improvement.

In addition, we also conduct regular supplier site visits and labour rights checks are integrated into these. We have continued to develop the labour rights capabilities of our employees who conduct these visits. There were 14 improvement actions related to labour rights identified during engagement visits in 2025. Actions are tracked and followed up through our engagement activities. Six corrective action plans have been implemented, verified and closed with 8 further corrective action plans 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.

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 (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 2025 the HRSG 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 audit findings and coordinating third party oversight. The HRSG reports to relevant members of GSK's Executive Committee and the CRC of the GSK board annually.

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 2025, we also rolled out training on human rights within R&D in line with updated international guidance to support the team with identifying and addressing any potential forced labour and modern slavery risks in R&D supply chains. Grievance mechanism training was also completed by 18 key suppliers in potential high-risk categories and markets, with the aim of strengthening existing approaches around access to remedy for workers.

We also invest and participate in industry and cross-industry collaborations including Business for Social Responsibility's Healthcare and Human Rights Forum and 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.

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 – whether internal or external – can report concerns through our Speak Up channels, which include our independently managed web reporting platform and helpline. People can report concerns anonymously where permissible by local laws. All reports are treated confidentially, and we have zero tolerance for retaliation. Each concern is carefully assessed to determine whether a formal investigation is required. Where we identify breaches of our Code, policies, or applicable laws and regulations, we take appropriate action in line with our procedures, disciplinary framework and local legal requirements.

In 2025, there were no Speak Up reports suggestive of modern slavery. More information on policy violations that took place in 2025 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 and audit programmes 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

GSK plc operates through global policies, systems and processes that are designed to be consistently applied across the company 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 read "JB", is positioned above a horizontal line. The signature is stylized and cursive.

Julie Brown
Chief Financial Officer

13 February 2026



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). 79 New Oxford Street, London, WC1A 1DG, United Kingdom.

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

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

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