



Our position on Human Rights



Basic principles

Companies, through their policies and practices, make various commitments to uphold human rights that are universal and inalienable. These rights are interrelated, as stated in the [Universal Declaration of Human Rights](#). This includes the rights to health, non-discrimination, humane treatment and data privacy. We have a responsibility to respect human rights through our engagements with patients, our employees, our suppliers and the communities in which we live and operate.

We believe governments are responsible for defining and enforcing a legal human rights framework that accords with international laws and agreements, such as the Universal Declaration of Human Rights. As a multinational organisation with global reach, we have a role to play in upholding human rights and addressing adverse human rights impacts where we can intervene. We are committed to taking a partnership approach, working with others who have the mandate, competence and capacity to facilitate change where we can.

We align our approach on human rights with the UN Guiding Principles on Business and Human Rights. This includes our commitment to respecting the rights contained in the Universal Declaration of Human Rights and the Fundamental Principles and Rights at Work set out by the International Labour Organisation. GSK is also a signatory to the UN Global Compact and supports the transparency requirements of the UK's Modern Slavery Act and similar legislation.

We have established a process of human rights due diligence to both identify the salient human rights that may be affected by our activities and those of our key business partners and also identify potential mitigation steps that need to be put in place to reduce that potential impact.

Our commitments

Where GSK has direct responsibilities, we are guided by our own high standards to act appropriately.

As an employer we are:

- committed to providing a fair salary and good conditions of employment
- committed to providing a healthy, safe and secure workplace for all employees and contractors
- committed to exercising high standards of integrity in dealing with and protecting the Personally Identifiable Information (PII) of employees
- committed to prohibit discrimination at work and to promoting diversity and inclusion
- committed to promoting the personal development and dignity of every individual employee
- respectful of the right of employees to join an independent trade union, the right to collectively bargain, and of freedom of association
- committed to eradicate all forms of forced labour and prohibit all forms of slavery and exploitative child labour and will work with appropriate partners to address this problem responsibly wherever we encounter it.

We seek to ensure that everyone at GSK is trained on the [GSK Code](#), which references our commitments to human rights and other relevant policies and standards.



As a purchaser of raw materials, manufactured goods and services around the world, we strive to conduct business with third-party suppliers, business partners and collaborators who share our commitment to high ethical standards and operate in a responsible and ethical manner towards their workers – both directly and indirectly employed – and their own suppliers.

We set out specific expectations on our business partners and third-party suppliers in our “Working with Third Parties” position which are aligned with the commitments set out in this statement. In addition, using a risk-based approach, we include human rights clauses in our contracts with suppliers, business partners and collaborators. These clauses are based on the UN’s Universal Declaration of Human Rights and the International Labour Organisation’s Core Labour Standards and other relevant international and industry standards. A more detailed explanation of the labour rights aspects of these expectations is set out in Appendix 1.

We believe that the rights, dignity and safety of people using our products, both during and after the product’s development, are paramount. We monitor rigorously the safety of our products to protect patients’ wellbeing, and that of people involved in the R&D and manufacturing of products. We are committed to ensuring that the human rights of people taking part in our clinical research are protected, including through the informed consent process and procedures to protect patient privacy. We are committed to patient-centred promotional practices which are ethical, responsible and principled.

As a marketer of healthcare products, we strive to make them as widely available as possible, while running our business in a sustainable way. Our contribution to improving healthcare in developing countries through providing vaccines and medicines at affordable prices, investing in stronger healthcare systems and developing an appropriate product range is vital in supporting this principle. So too is our undertaking to continue to supply medicines in all countries where they are requested, sharing the judgement of the UN that people should not be denied access to medicines because of the regime operating in the country. It may, however, be necessary to cease to trade in countries when required to by law or where it becomes impossible to act in accordance with our own code of conduct.

As a global corporate citizen, we play our part in promoting the development of science, education and the community generally. We respect the law and behave with honesty and integrity in all aspects of public life and demonstrate responsible leadership. As a member of local communities, we respect and promote the rights of all those within our sphere of influence in those communities.

Find out more on Responsibility by visiting [gsk.com](https://www.gsk.com).

How we implement our human rights commitments

Human rights due diligence and governance

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 also determine appropriate actions in response.

Through two company-wide assessments we have identified our most salient overarching human rights issues as access to healthcare; research practices; patient safety; environment; health and safety; labour rights and privacy.



Building on this and using 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 and plans on human rights, and these are reviewed on a yearly basis.

We have established a cross-business Human Rights Steering Group (HRSG) to deliver action on human rights. This group comprises of senior representatives from key business functions and meets regularly 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 capacity on human rights, both in raising awareness across the business on our commitments and in providing function-specific trainings. The HRSG reports to GSK's Leadership Team annually.

GSK's Corporate Responsibility Committee ("CRC") has oversight of human rights issues on behalf of GSK's Board. The CRC receives an annual update from management.

Collaboration is an important part of GSK's implementation of human rights commitments, both in terms of collaboration with business partners, but also with other companies in the pharmaceutical sector through initiatives such as the Pharmaceutical Supply Chain Initiative (PSCI).

We understand human rights due diligence as an ongoing and dynamic process and are therefore committed to responding to new risks and continuously updating and refining our process as necessary.

We acknowledge that specific groups of people might face greater risk of negative human rights impacts. In our human rights due diligence, we seek to ensure that specific risks for potentially vulnerable groups - such as women, children and indigenous peoples - are identified and where possible taken into account.

Reporting

We regularly report on our progress on human rights activities and outcomes across the business through internal reports which are considered by GLT and the CRC on behalf of the board and externally through integration of human rights dimensions into our ESG Performance Report, Annual Report and legislation required reports, including the Modern Slavery reports.

Remedy and grievance mechanisms

Ensuring that affected rightsholders and others have an opportunity to bring any human rights challenges to GSK's attention is an important dimension of how we seek to respect human rights. We have a range of approaches whereby patients, employees, supply chain workers and external stakeholders can raise appropriate issues, including the [Speak Up channel](#). Our Speak up integrity lines, available in multiple languages, allow anyone inside or outside GSK to raise concerns or speak to an independent third party, confidentially or anonymously, without fear of retaliation.

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.

Appendix 1 – how we understand the labour standards component of our human rights principles and commitments

Here we provide more detail on the human rights principles that GSK seeks to uphold in its own operations. In particular, here we focus on labour rights issues. We also expect our suppliers to uphold these, and communicate the principles down their own supply chains. These standards represent a minimum and do not preclude third parties from adopting higher standards.

No use of child labour

Third parties must not employ workers who are younger than the country's legal minimum age for employment or the age established for completing compulsory education. Children under the age of 15 must not be employed in any circumstances. Robust age verification checks should be in place to ensure this expectation is met.

Young workers (those under 18 years of age but above the legal working age) are still growing and developing. They are less experienced and more vulnerable than adult workers to being exploited, injured or made ill from their job. For this reason, young workers must be afforded extra protection and must not be employed in hazardous work – that which could jeopardise their physical, mental or moral well-being. This includes (but is not limited to) working at night; working excessive overtime; or being exposed to chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise. Workers under the age of 18 must be subject to an appropriate risk assessment and regular monitoring of their health and working conditions.

References: ILO Minimum Age Convention C138, ILO Worst Forms of Child Labour Convention C182

No use of forced labour

All work must be conducted on a voluntary basis, not under threat of any kind. Prison, indentured, bonded or otherwise involuntary labour, including modern slavery and human trafficking, is prohibited. Workers must not be required to lodge original identification papers or monetary deposits on starting work. Workers must be able to leave their employer after reasonable notice, the period of which should be agreed upon engagement, and should receive all owed salary.

References: ILO Forced Labour Convention C29, ILO Abolition of Forced Labour Convention C105

A safe and healthy workplace is provided

All workers must be provided with clean and safe conditions in all work and residential facilities. Workers should have access to clean toilet facilities, potable water, and if applicable, hygienic food storage. Adequate steps to prevent accidents and injury arising out of, associated with, or occurring during work, must be taken by minimising the causes of occupational hazards. In the event of an occupational accident or incident, emergency healthcare is provided to workers.

Health and safety information and training should be provided to workers so they are able to understand the hazards, risks and control measures associated with their job. At least one senior management representative should be assigned responsibility for health and safety and a risk-based management system should be implemented with clearly defined accountabilities for maintaining it.

References: ILO Occupational Safety and Health Convention C155

No discrimination is practiced

All workers must be treated with respect and dignity. The employment relationship must be based on the principle of equal opportunity and fair treatment. This means that workers must not be discriminated against based on race, colour, religion, ethnicity, disability, gender, sexual orientation, gender identity, political affiliation, union membership or marital and/or pregnancy status in any hiring or employment practices, including remuneration.

References: ILO Equal Remuneration Convention C100, ILO Discrimination (employment and occupation) Convention C111

No cruel or abusive treatment

Third parties must provide a workplace free of harsh and inhumane treatment, including any corporal punishment; mental, physical, sexual or verbal abuse; and no threat of any such treatment or other forms of intimidation.

Written disciplinary procedures should be established and explained to workers in terms that are clear and understandable to them. Disciplinary and/or performance management actions should be recorded and explained to workers. Workers must have the right to trade union or other appropriate representation at a disciplinary action, which may lead to significant disciplinary penalties or dismissal.

References: ILO Forced Labour Convention C29, ILO Abolition of Forced Labour Convention C105

Fair wages and benefits

All third parties must pay at least the statutory minimum wage, or a fair representation of the prevailing industry wage, and provide all legally mandated benefits and paid leave. Wages should always be enough to meet basic needs and to provide some discretionary income.

A transparent process must be established to ensure that workers are compensated in a timely manner and fully understand the wages that they receive.

References: ILO Minimum Wage Fixing Convention C131, ILO Protection of Wages Convention C95, Hours of Work Conventions C001 & C030

Working hours are not excessive

Third parties must ensure that working hours comply with national laws and collective agreements. Standard weekly working hours, excluding overtime, must be defined by contract and not exceed 48 hours per week and eight hours a day, to ensure a safe and healthy working environment and adequate rest time between shifts. The total hours worked, including overtime, in any week must not regularly exceed 60 hours in a single week with a minimum of one day rest per week.

Working hours may only exceed 60 hours in a single week if any of the following conditions are met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; or the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

All overtime undertaken over and above the standard working day/week, as agreed upon engagement, must be voluntary. Workers should receive clear communication about whether overtime is required and the wages to be paid for such overtime. Any overtime undertaken by workers should be compensated at a rate no less than one and one-quarter times the regular rate.

References: ILO Hours of Work Conventions C001 & C030, ILO Weekly Rest Conventions C106 & C014

Freedom of association

All workers must be free to establish and join groups for the promotion and defence of their interests. Workers' representatives must be free to carry out their representative functions in the workplace, including collective bargaining.

References: ILO Freedom of Association and Protection of the Right to Organise Convention C087, ILO Right to Organise and Collective Bargaining Convention C098

Grievance mechanism

Third parties must provide a grievance mechanism for workers to raise occupational concerns. This mechanism should be accessible, understandable and transparent to workers. Issues raised should be dealt with promptly by an appropriate level of management and feedback should be provided to those concerned, without any reprisal. This mechanism must also provide workers with the option of flagging concerns anonymously. Employees of third parties may also report concerns via GSK's 'Speak up' Integrity Lines (worldwide numbers and information are available online at www.gsk.com/integrity).

References: UN Guiding Principles on Business and Human Rights No.29 & No.31