

Modern Slavery and Human Trafficking Statement for GSK

This statement is made on behalf of GSK Stockmann Rechtsanwälte Steuerberater Partnerschaftsgesellschaft mbB and its affiliated companies (together: “GSK”, “we”, “us”). Slavery and human trafficking are serious human rights offences that we strongly condemn in all of their forms. As required by Section 54 (1) of the UK Modern Slavery Act 2015, this statement describes the steps we have taken during our financial year from 1 January to 31 December 2022 to ensure that slavery and human trafficking are not taking place in any of our supply chains, or in any part of our business(es). We are aware that slavery and human trafficking may take place even in firms that operate with due care and at the highest professional standards.

OUR BUSINESS

We are a leading independent European corporate law firm with over 250 professionals across our offices in Germany, Luxembourg and the UK. We are a limited liability partnership with registered office in Munich, Germany. We also operate further offices in Berlin, Frankfurt am Main, Hamburg and Heidelberg. In addition, we operate offices in Luxembourg and London. For further information, please visit our website at www.gsk.de.

Our principal activity is providing commercial legal services. We have wide-ranging expertise including banking, real estate, M&A, private equity & venture capital, dispute resolution, tax, compliance, restructuring, IP & IT, data protection, antitrust and employment law. In doing so, we also strive for the highest ethics and integrity standards.

Modern slavery and human trafficking are serious human rights offences that we strongly condemn in all of their forms. We are committed to taking steps to prevent incidents of slavery and human trafficking from occurring anywhere in our businesses or supply chains.

OUR SUPPLY CHAINS

We are committed to taking steps to prevent incidents of slavery and human trafficking from occurring anywhere in our businesses or supply chains. Key suppliers for us as a law firm include office equipment providers, IT service providers, catering services and cleaning businesses. We aim to foster long-term relationships with service providers. These service providers are carefully selected by the heads of the business service units and the office managers. The vast majority of our service providers are based in Germany or the European Union, which means that they are also subject to strict employment and environmental law.

Moreover, we are aware of the positive impact we can have in developing countries. At our Heidelberg and Munich offices, coffee is sourced from Bean United. For every kilogram of coffee purchased, Bean United is able to finance ten school meals in Burundi.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

GSK respects human rights and the prohibition of forced labour, child labour and human trafficking. We strive to ensure fair working conditions (e.g. statutory holiday entitlement, maximum working hours)



and a living wage (above the statutory minimum) and respect employees' right to collective bargaining. We stand firmly against all forms of discrimination and support equal opportunities and equal treatment in the workplace. All our employees, regardless of where they work, enjoy the same employment protection under German law.

We are committed to complying with internationally recognised labour and social standards. Our commitment includes adherence to the labour standards set out in the United Nations (UN) Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights, as well as the OECD Guidelines. In addition, we offer a number of internal programmes to promote the wellbeing of our employees such as feedback tools, yoga sessions and general resilience workshops. Our whistleblowing policy ensures that all employees know that they can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisal.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Policy for business partnership due diligence
- Policy for sanctions compliance
- Anti-Money-Laundering Policy
- Contract Management Tool

DUE DILIGENCE PROCESSES AND SUPPLIER ADHERENCE

In order to evaluate the potential risks of our supply chains and business partners, we have established a business partner due diligence process which we conduct before concluding contracts with new business partners. Moreover, we carry out focused due diligence checks to identify potential issues as well as reviews of existing business relationships (particularly in high-risk areas of our supply chain).

To ensure all those in our supply chain and contractors comply with our values, we have a risk-based approach in place for all our service providers and define appropriate measures in case of inconsistencies.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

In order to assess our effectiveness, we are committed to capturing any incidents of modern slavery within our business and its supply chain. We achieve this through the due diligence checks as outlined above.

NEXT STEPS

We are also working on the following next steps:

- Establishing a Code of Conduct (CoC) defining our values and guiding principles, which we will then actively promote within the firm and in our contractual relationships.
- Planning workshops to raise awareness about modern slavery and human trafficking.



- Where appropriate, we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement is authorised and approved by the co-managing partners of GSK Stockmann Rechtsanwälte Steuerberater Partnerschaftsgesellschaft mbB.

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