

GSK Stockmann Modern Slavery Statement

This statement is made on behalf of GSK Stockmann Rechtsanwälte Steuerberater Partnerschaftsgesellschaft mbB and its affiliated companies (together: “**GSK**”, “**we**”, “**us**”). Modern slavery is a serious human rights offence that we strongly condemn. 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 2024 to ensure that modern slavery is not taking place in any part of our business(es) or our supply chains. We acknowledge that today modern slavery¹ can occur in many different forms such as coerced, forced or compulsory labor, child labor, domestic servitude, human trafficking, sex trafficking and workplace abuse. Therefore, throughout this statement we use the term “modern slavery” to encompass these various forms of coerced labor.

We are aware that modern slavery may take place even in firms that operate with due care and at the highest professional standards. Yet we remain committed to preventing modern slavery from occurring anywhere in our business(es) or supply chains. Therefore, we have dedicated significant time and resources for implementing and continuously developing an effective and efficient compliance management and we keep striving to collaborate with all our clients, business partners and our professionals to support improvements in the prevention of modern slavery.

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, Heidelberg and Mönchengladbach. In addition, we operate offices in Luxembourg and London. This international operation is done through separate legal entities that are, however, integrated in our general GSK compliance standards. For further information, please visit our website at www.gsk.de.

Our principal business activity is providing commercial legal services for a wide range of commercial organizations, public authorities and individual private clients. We have deep-rooted 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.

¹ A definition of modern slavery updated on June 2, 2025 can be found online under <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims/modern-slavery-statutory-guidance-for-england-and-wales-under-s49-of-the-modern-slavery-act-2015-and-non-statutory-guidance-for-scotland-and-northe#what-is-modern-slavery>.



OUR CHAINS OF ACTIVITIES

We are committed to taking steps to prevent incidents of modern slavery and human trafficking from occurring anywhere in our business activities or supply chains. Contractual third party business partners for us as a law firm include key suppliers such as office equipment providers, IT service providers, catering services and cleaning businesses and business partners such as (sub-) contractors, consultants, advisors, public accountants and employment as well as private placement agents. We aim to foster long-term relationships with our business partners. These business partners are carefully selected by the management, the heads of our 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 public employment- and environmental law regulation and oversight. Nevertheless, we are aware that even within the European Union or the UK persons can become victims of modern slavery. Hence, we are performing regular risk analysis on a yearly basis.

OUR POLICIES ON MODERN SLAVERY

GSK respects human rights and the prevention of modern slavery. 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, respectively as regards our offices in Luxembourg and London Luxembourg law and the laws of England & Wales as applicable.

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. 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 have implemented the following firm-wide policies relevant to the prevention of modern slavery, which we continuously review and update:

- Policy for business partner due diligence
- Policy for sanctions compliance
- Anti-Money-Laundering Policy
- Whistleblowing Policy



COMPLIANCE PROCESSES AND BUSINESS PARTNER COMPLIANCE

In order to keep evaluating the potential modern slavery risks in our supply chains, 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. Moreover, we have a centralized client onboarding team for KYC and AML checks of new clients and a contract management tool in place monitoring the contracts of all external suppliers.

To ensure all our business partners comply with our values, we have a risk-based approach in place for all our business partners and define appropriate measures in case of inconsistencies.

OUR EFFECTIVENESS IN PREVENTING MODERN SLAVERY

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 regularly performed risk-based health-checks, appropriate analysis of whistleblowing reports, focused employee training and continued development and monitoring efforts. We recognize the importance of supporting the mental and physical well-being of our employees. To this end, we collaborate with the IAS (*Institut für Arbeits- und Sozialhygiene*) and the VIVA Family Service to provide comprehensive health care and wellness programs. These partnerships enable us to offer resources and support systems that promote a healthy work environment and ensure our team members have access to the necessary tools for maintaining their overall health and well-being. Moreover, the services offered by Viva Family Services include useful information, advice sessions and the provision of care staff for children and relatives in need of care.

NEXT STEPS

We are also working on the following next steps:

- Establishing a firm-wide Code of Conduct (CoC) defining our values and guiding principles, which we will then actively promote within the firm and in our contractual relationships.
- Detailed analysis on modern slavery high-risk business partners
- Intensified external and internal communication of the Modern Slavery Act 2015 as well as related international, supranational and national legislation in our policies and procedures.

COMMUNICATION

Questions around this Modern Slavery Statement can be put forward to:

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

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