

# **Human Rights Statement 2023**

**Covering Modern Slavery,  
Decent Work, Forced Labour and Child Labour**

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# About this statement.

This is Haleon's Human Rights statement (the "Statement"). It provides an account of our approach to managing our human rights impacts and risks. This includes the steps we have taken to identify, cease, prevent, mitigate, and remedy human rights risks including those relating to modern slavery, decent work, forced labour, and child labour for the year ending on 31 December 2023.

Haleon has active entities in 58 countries and our value chain reaches many more. Our approach to identifying, managing and mitigating our modern slavery, forced labour, child labour and other human rights risks is a holistic one. We seek to address these issues as part of our overarching human rights strategy, recognising the interconnectivity of our complex value chains. Haleon has policies and processes in place relating to human rights that cover both our own operations and those of our suppliers.

In light of our global approach to the management of human rights risks, we have chosen to prepare a single statement which reports on the approach we have taken to respecting and promoting human rights wherever we do business in the world and the actions we have taken in respect of human rights risks in 2023.

This Statement has been prepared to satisfy the reporting requirements set out in the following pieces of legislation:

- The UK Modern Slavery Act 2015
- The Modern Slavery Act 2018 (Cth) in Australia
- The Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2022
- The Norwegian Transparency Act 2022
- The California Transparency in Supply Chains Act 2010
- The Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour 2022<sup>1</sup>

This Statement covers the structure, operations, supply chain and value chain of the following Haleon businesses, collectively referred to as "Haleon" for the purposes of this Statement:

- The relevant Haleon entities in the UK for the purposes of the UK Modern Slavery Act 2015 are Haleon plc, Haleon UK Services Limited, Haleon UK Trading Limited, Haleon UK Trading Services Limited and Haleon UK Export Limited.

- Haleon in Australia is comprised of Haleon Australia Pty Ltd.
- Haleon in Canada is comprised of Haleon Canada ULC/Haleon Canada SRI and PF Consumer Healthcare Canada ULC/PF Soins De Santé SRI
- Haleon in Norway is comprised of Haleon Norway AS.
- The relevant Haleon entities in the US for the purposes of the California Transparency in Supply Chains Act are Haleon US Inc, Haleon US Holdings LLC, and Haleon US LP
- The relevant Haleon entity in Switzerland for the purposes of the Swiss Ordinance is Haleon CH SARL.

Haleon plc is the ultimate parent company of all of the companies in the Haleon Group including those companies in Australia, Canada, Norway, the USA and Switzerland. Unless otherwise stated, all of the policies, processes, systems and activities described in this Statement apply equally to each of the above companies.

1. This Statement only relates to child labour and does not include information about minerals and metals from conflict affected areas.



# Approvals.

## UK

In accordance with the UK Modern Slavery Act, this Statement has been approved by the Board of Directors of Haleon plc, for and on behalf of Haleon plc, Haleon UK Services Limited, Haleon UK Trading Limited, Haleon UK Trading Services Limited and Haleon UK Export Limited.

Signed by

**Brian McNamara**  
CEO of Haleon plc  
23 April 2024

## Australia

In accordance with the Australian Modern Slavery Act, this Statement has been approved by the Board of Directors of Haleon Australia Pty Ltd.

Signed by

**Anish Patel**  
Director of Haleon Australia Pty Ltd  
3 May 2024

## Canada

In accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2022 the Statement has been approved by the board of directors of Haleon Canada ULC/Haleon Canada SRI signed by Rupa Bahri and by the board of directors of PF Consumer Healthcare Canada ULC/PF Soins De Santé SRI, and signed by Rupa Bahri

Signed by

**Rupa Bahri**  
Haleon Canada ULC/Haleon Canada SRI  
25 April 2024

**Rupa Bahri**  
PF Consumer Healthcare Canada ULC/  
PF Soins De Sante SRI  
25 April 2024

## Norway

In accordance with the Norwegian Transparency Act, this Statement has been approved and signed by the board of directors of Haleon Norway AS and by Signe Kullman, the General Manager of Haleon Norway AS.

Signed by

**Signe Kullman**  
General Manager and Chairman of the Board of Haleon Norway AS  
15 May 2024

**Tobias Løvaas Opsahl**  
Board Member of Haleon Norway AS  
15 May 2024

## Switzerland

In accordance with the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour 2022, this Statement has been approved by the board of Haleon CH SARL and signed by Mark Van Emst, Legal Director, and Aurélien Uldry, Senior Finance Director and Nyon Campus Lead.

Signed by

**Mark Van Emst**  
Legal Director  
14 May 2024

**Aurélien Uldry**  
Senior Finance Director and Nyon Campus Lead  
14 May 2024



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## Introduction

Our purpose at Haleon is to deliver better everyday health with humanity. As a multinational organisation with global reach, we are committed to respecting and promoting human rights across our value chain. Our approach to human rights is to work collaboratively across our business and value chain, as well as with industry partners. We are committed to following the UN Guiding Principles on Business and Human Rights (UNGPs), the Organisation for Economic Co-Operation and Development's (OECD) Guidelines for Multinational Enterprises and obligations imposed by national and international legislation where it applies. We are committed to upholding the Universal Declaration of Human Rights and the core labour standards set out by the International Labour Organisation (ILO).



# Our business structure, operations and supply chains.

Haleon is a global leader in consumer health, with brands trusted by millions of consumers globally.

Haleon's product portfolio spans five major categories – Oral Health, Pain Relief, Respiratory Health, Digestive Health and Other, and Vitamins, Minerals and Supplements. Our turnover was **£11.3 billion in 2023**. As of December 2023, we employed over **25,000** employees. We also engage many workers who are not directly employed by Haleon but who are working for us as third party temporary workers or as contractors.

We have commercial operations and research and development centres across the world. Our manufacturing network includes **24** of our own sites (see map on page 5).

We also source our products through a network of third party manufacturing suppliers across the world. As of December 2023, we had approximately **16,000** third party tier 1 suppliers, which included approximately **3,000** suppliers of goods and services directly related to the manufacturing of our products, such as raw materials and packaging, and approximately **13,000** suppliers of other ancillary goods and services such as consultancy, marketing, and logistics.

Further information on our business can be found in our [2023 Annual Report and Form 20-F](#) →



**~16,000**

suppliers  
globally



**24**

owned  
manufacturing sites



**~25,000**

employees  
globally

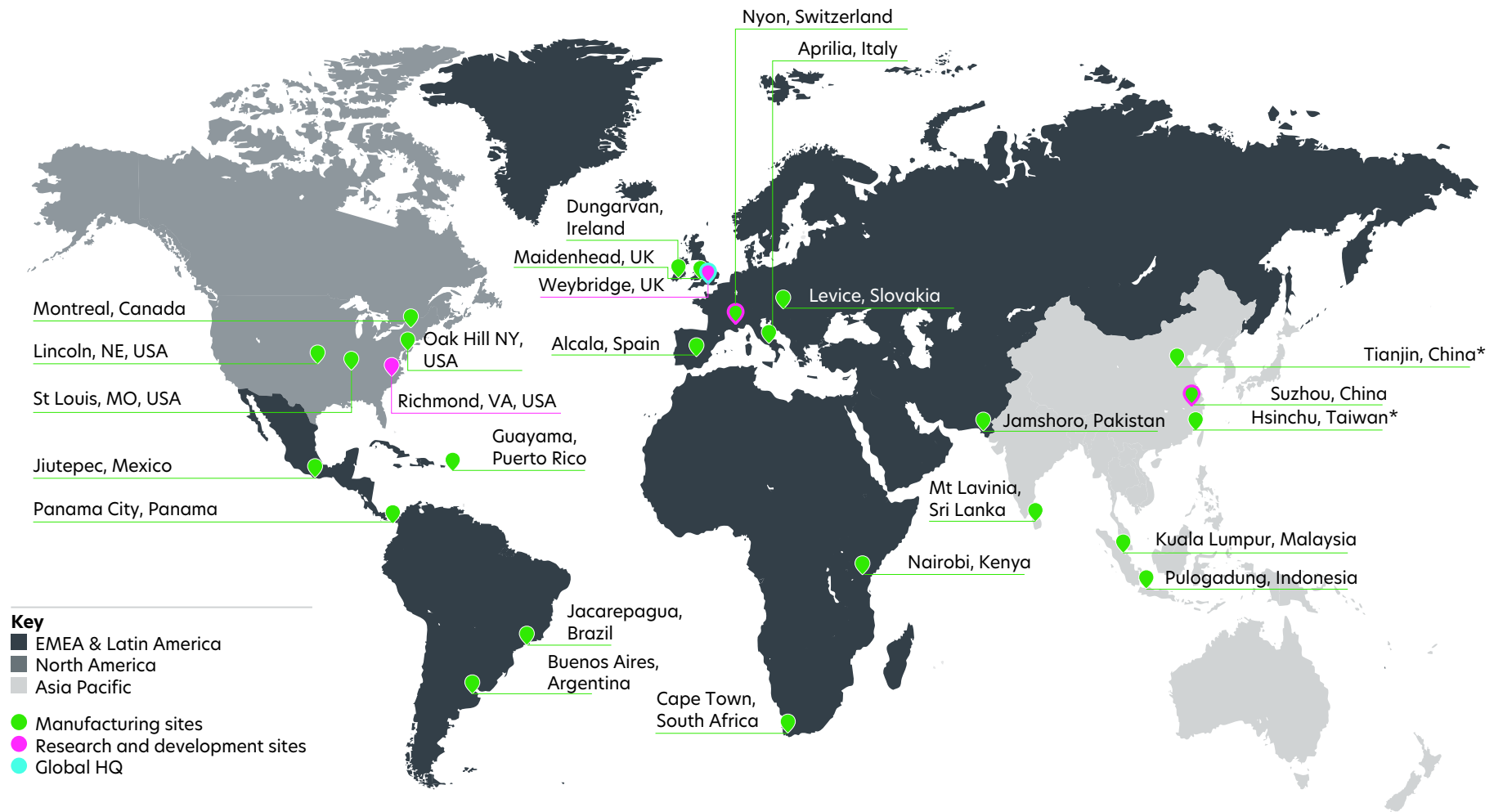


**£11.3 billion**

turnover  
in 2023



# Our business structure, operations and supply chains **continued**



\* Joint-venture site



# Governance.

In 2022, Haleon created a human rights governance structure to embed human rights across our business.

The diagram on page 7 provides an overview of governance, accountability, and reporting lines. Our Board receives an annual report on human rights. This includes a summary of actions being taken to manage human rights risks, including the risks of modern slavery, forced labour and child labour in our business operations, supply chain and wider value chain.

The Human Rights Steering Committee, which includes members of our Executive Team, met three times in 2023 and received additional updates throughout the year in order to provide oversight and support on human rights issues. They are responsible for approving the human rights action plan and strategy.

During 2023, members of the Steering Committee included the Head of Transformation and Sustainability, the Chief Supply Chain Officer, the Chief Human Resources Officer, the General Counsel and the Chief Procurement Officer.

In 2023, our cross-functional Human Rights Working Group met twice to discuss human rights policies, processes, and issues across the business. The working group is responsible for ensuring the delivery of our human rights action plan and cascading knowledge on human rights across functions, manufacturing sites and our Business Units. The working group will continue in 2024 and will meet quarterly.

From 2024 onwards, the newly formed Environmental and Social Sustainability Committee, a committee of the Haleon Board, will provide oversight for management of human rights risks across the business.

Additionally, the Sustainability Compliance and Risk Forum (CRF) is responsible for monitoring, assessing, and mitigating potential sustainability and social risks, including human rights risks, that may impact Haleon's responsible business strategy delivery. In 2023, the Forum met at least every other month. The outputs from the Forum feed into the executive level Enterprise Risk and Compliance Committee, which in turn feeds into the Audit and Risk Committee of the Board. For further information on risk and governance see pages 10 and 11 of Haleon's 2023 [Responsible Business Report](#).



# Governance structure.

## Haleon Board

Sets Haleon's Responsible Business strategy and long-term objectives, with the Board receiving an annual report on Haleon's human rights progress and providing overall approval of the Human Rights Statement

## Audit and Risk Committee

Monitors and reviews Haleon's risk management systems, including the identification and management of risks and Haleon's principal risks, one of which is ESG, which includes human rights

## Environmental and Social Sustainability Committee

Provides oversight and effective governance over Haleon's environmental and social sustainability agenda, including management of human rights risks. Ensures compliance with human rights related external governance and regulatory requirements

## Chief Executive Officer and Haleon Executive Team

Responsible for delivering Haleon's responsible business strategy, including human rights, and driving responsible business performance

## Enterprise Risk and Compliance Committee

Ensures that risks, including human rights risks, are adequately managed and that the risk management framework is effectively deployed throughout Haleon

## Human Rights Steering Committee

Provides oversight of Haleon's human rights strategy and action plan, including decision-making and performance monitoring

## Sustainability Compliance Risk Forum

Responsible for monitoring, assessing, and mitigating potential risks, including human rights risks, that may impact Haleon's responsible business strategy delivery

## Human Rights Working Group

Responsible for the delivery of human rights action plan and cascading knowledge on human rights risks across the business

Business Units

Manufacturing Sites

Global Functions





# Our policies and procedures.

We have several group-wide policies and procedures in place to manage our human rights impacts. We regularly review and develop our policies as we gather more insight into our risks and obtain input from in-house experts, suppliers, and external stakeholders.

## Code of Conduct

Our [Code of Conduct](#) applies to everyone at Haleon, across every location, and in every role and level of seniority. Our suppliers, distributors, agents, consultants and contractors are also subject to many of the principles of our Code. Our Code clearly sets out our culture and ethical principles. It helps us create a culture of seeking to always do the right thing. It includes human rights requirements and provides examples of human rights issues such as forced labour.

## Human Rights Policy

Our [Human Rights Policy](#) outlines our commitment to respect and support human rights and decent working conditions wherever we do business. It specifically outlines our commitment to following the UN Guiding Principles on Business and Human Rights, the OECD Guidelines, the core ILO labour standards and child labour conventions. It also sets out our expectation that employment is freely chosen and that child labour will not be used. In 2023 we updated our Human Rights Policy to strengthen our commitments on due diligence and remedy, and to reinforce our expectations of suppliers and third parties with which we do business.

## Supplier Code of Conduct

In 2023 we launched a new [Supplier Code of Conduct](#). This establishes the minimum standards that must be met by any entity that supplies products or services to the Haleon group of companies. It includes (among other things) minimum standards on child labour; modern slavery; human trafficking and forced labour; wages and remuneration; freedom of association and collective bargaining; fair treatment and no discrimination; and working hours. We include a requirement to comply with the Supplier Code of Conduct in our contracts with suppliers.

## Working with Responsible Third Parties Policy Position

This policy position document outlines our minimum expectations of suppliers including our expectation that third parties who work with us follow our Human Rights Policy.

## Speak up

Our Speak Up grievance mechanism allows anyone, whether working for Haleon or not, to report possible breaches of law or policy, including our Human Rights Policy or our Supplier Code of Conduct, or to raise any other concerns around human rights abuses. The reporting channels are provided by an independent third party and are multilingual and publicly available. For more details of how this mechanism works, please see page 12.

In recognition of our commitment to ensuring decent working conditions, we became a Living Wage Employer in the UK in 2022, accredited by the Living Wage Foundation.



# Due diligence and risk assessments.

Our due diligence approach to managing the risk of adverse human rights impacts (including modern slavery, forced labour and child labour) forms part of our broader efforts to respect and promote human rights.

Our approach follows the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises and their guidance on human rights due diligence.

Based on our due diligence and risk assessments, we consider our directly employed workforce to have a lower risk of adverse human rights impacts, including instances of modern slavery, forced labour, and child labour. Our exposure to these risks increases when we engage with third parties, particularly in categories such as facilities management, construction, logistics (transportation and warehousing) and labour provision, as well as in our raw material supply chains.

To identify and assess the risk of human rights abuses (including modern slavery, forced labour and child labour), we have undertaken the following steps:

## Salient human rights issues

In 2023, our Human Rights Working Group, supported by external consultants, initiated the first saliency risk assessment of our value chain. Under the assessment, human rights risks are prioritised based on the severity of impact and likelihood of occurrence across our own operations, business relationships and supply chains. Identifying our most salient issues enables us to focus and prioritise our action plan on these topics. We will share the findings of our saliency assessment in due course.

## Annual Human Rights Risk Assessment

In 2023, we conducted our annual human rights risk assessment to help us identify our human rights risks and prioritise areas for action. We looked at our risks across our value chain. This included internal stakeholder engagement and a country and business activity risk assessment. We identified a new area of business activity with an inherent human rights risk, particularly a high inherent risk of modern slavery or forced labour: third party service workers who are engaged to work at our sites.

Activities identified in our previous risk assessment as representing a high inherent risk of modern slavery or forced labour included our third party logistics supply chain, use of labour providers for temporary and lower skilled workforce and construction activities being carried out at our sites. Additionally, we previously identified raw material supply chains such as palm oil and mint as representing a high inherent risk of both modern slavery or forced labour and child labour.

Our work in addressing these remaining areas of risk continues and further details on remediation activities can be found on pages 12 and 13.

## Regular risk management

Our Third Party Risk Management (TPRM) process seeks to proactively assess risks across our supply chain. As part of this process, we carry out risk assessments to identify human rights risks when engaging new suppliers and other partners. The TPRM screening process was updated in 2023 to include the Children's Rights in the Workplace Index (part of UNICEF's Children's Rights and Business Atlas). Where our TPRM



# Due diligence and risk assessments **continued**

or our routine risk management processes highlight a potentially high-risk supplier we conduct targeted in-depth due diligence. We use a combination of tools provided by EcoVadis and Sedex for initial assessments, as well as using Pharmaceutical Supply Chain Initiative (PSCI) audits and Sedex's SMETA audits for on-site detailed investigations to assess human rights risks.

Haleon joined the ethical supply chain platform hosted by Sedex in 2023. All of our own manufacturing sites have completed Sedex's self-assessment questionnaire, allowing us greater visibility of our impact. Additionally, three of our manufacturing sites have been selected for a 4 pillar Sedex SMETA audit, which involves an onsite assessment by an independent auditor in the areas of labour standards, health and safety, environment and business ethics, and includes interviews with key stakeholders such as third party workers. We began moving our network of third party manufacturers onto the platform in 2023. Our phased plan is to continue rolling out the Sedex platform further to our tier 1 suppliers (i.e suppliers who supply directly to us) in 2024, prioritising those suppliers where there are the greatest inherent human rights risks, based on activity type.

In relation to PSCI audits, we conducted audits of 25 suppliers (including third party manufacturers) against the PSCI principles in 2023. Furthermore, we used the PSCI platform to assess available audit reports for an additional four suppliers. The PSCI principles include requirements relating to human rights. The audits were carried out by third party audit firms and Haleon internal auditors. The suppliers which are audited are selected based on those representing the highest environmental, human rights or governance risks based on the nature of the goods or services they supply or their location.

## In-depth due diligence for high-risk activity

Where our annual risk assessment, regular risk management or grievance mechanisms have identified activities posing higher risks of potential human rights impacts, Haleon has commissioned subject matter experts to undertake targeted in-depth due diligence.

### Labour Providers

In 2023, we undertook an assessment of labour providers responsible for providing temporary workers to three of our manufacturing sites. Labour provision and recruitment have been widely documented by experts as being types of activities at risk of poor practices such as charging of recruitment fees,

withholding of identity documents, and other practices which put workers at risk of forced labour.<sup>1</sup> Our assessment included confidential interviews with workers in their own language, and with management teams. For details of actions taken as a result of our assessment, of labour providers, please see the Remediation section on page 12.

### Child Labour Deep Dive

We undertook a survey of our own manufacturing sites to confirm that no child labour is present. Our next step to minimise our child labour risks has been to implement our Child Labour Action Plan, pursuant to which we are carrying out preliminary due diligence as well as in depth assessments across our tier 1 suppliers where there is a higher risk of child labour. This will continue in 2024.

### Raw Materials Suppliers

In managing the human rights and environmental risks in our raw material supply chain (which we have identified as representing higher risks of human rights abuses, including in relation to modern slavery/forced labour and child labour) we have adopted a sustainable sourcing strategy. We have prioritised a number of key agricultural, forestry and marine-derived material supply chains, which include palm, paper, mint, carrageenan,

1. International Labour Organization (no date), Temporary Agency Work, available at: <https://www.ilo.org/sector/activities/topics/temporary-agency-work> (accessed on: 08 April 2024).



# Due diligence and risk assessments **continued**

tobacco, soy, fish oils and corn/wheat derivatives, for in depth assessment based on the severity and likelihood of potential human rights and environmental impacts, and also on our ability to influence any identified negative impacts in those supply chains.

In 2022, we focused on our mint supply chain as an area of potential human rights risk given that a large proportion of the mint which is processed and ultimately used in the flavours that we purchase for our products originates from small farms in Northern India, and it is well known that human rights abuses – such as child labour, forced labour, poor working conditions and gender inequality – are persistent risks in many agricultural supply chains. We commissioned a human rights impact assessment to better understand these risks and our impacts in light of the highly complex and multi-layered mint supply chain.

For details of actions taken as a result of our assessment of our mint supply chain, please see the Remediation section on page 13. In addition, since 2019, we have been a member of Action for Sustainable

Derivatives (ASD), a collaborative initiative bringing together companies in the cosmetics, home and personal care, and oleochemicals industries to tackle environmental and social supply chain issues around palm oil derivatives. Membership has included our participation in ASD's Sustainable Palm Index (SPI) which uses an in-depth third party evaluation to assess our suppliers' progress on supply chain knowledge and sustainable sourcing practices.

## Traceability

We have records for our tier 1 suppliers showing the identity and location of operations of those suppliers. Tier 1 includes suppliers where there is a higher risk of human rights abuses such as our third party manufacturers, raw material and packaging suppliers to our manufacturing sites, logistics, labour providers and corporate services suppliers.

Beyond tier 1, we have focused our traceability efforts on those supply chains where there is a higher risk of human rights abuses (including forced labour and child

labour). To this end, throughout 2023, our Sustainable Sourcing team has worked to increase the traceability of our products which are agricultural, forestry or marine derived. Our initial focus has been on mint and palm oil. Our membership of Action for Sustainable Derivatives (ASD) has helped us to gain greater traceability of our palm oil supply chain beyond tier 1 by mapping 98% of volumes to refineries, 97% to mills and 76% to plantations for our 2022 purchased volumes<sup>2</sup>.

In addition, our Healthy Mint Supply Chain Programme, which we launched in collaboration with Non-Governmental Organisations (NGOs) and our principal mint flavour suppliers, aims to improve our traceability of mint by working with our flavour suppliers to identify the farmers and farmer producer cooperatives (FPCs) which are further down our mint supply chain. See page 13 to learn more about this programme and our remediation of human rights risks in mint supply chains.

2. Percentages relate to volumes which are purchased via our globally managed spend only, which covers the majority of our internal spend and expands across some of our third party manufacturing network.



# Remediation.

Remedy is a critical step after due diligence and if we find that our business may have caused or contributed to an adverse human rights impact, including, modern slavery, child labour or forced labour, we will seek to cease the harm, prevent it from happening again, and mitigate the impact.

## Human Rights Incident Response Plan

Drawing on the UN Guiding Principles on Business and Human Rights, in 2023 we developed a Human Rights Incident Response and Communications Plan and ran a workshop for staff from key business functions including legal, security and investigations, and employee relations. Through real life scenarios, the participants gained detailed knowledge of how to identify the human rights impact of an issue, how to determine the severity of a potential impact, and how to assess whether Haleon may have caused, contributed to, or be linked to the impact. These skills enable the participants to take a rights-centred approach to managing incidents within the business. This Response Plan supports those involved in investigating, addressing, and communicating human rights risks to act in the best interests of the potential victim and ensure Haleon takes the best action possible. The Plan was developed by internal teams, including the Haleon Human Rights team, in collaboration with an external human rights expert.

## Grievance Mechanism

The OECD Due Diligence Guidance for Responsible Business Conduct recommends that businesses establish operational-level grievance mechanisms. Our grievance mechanism is called 'Speak Up' and it is available to all Haleon employees, contractors, suppliers, workers in our supply chains, communities where we operate and anyone outside of our business who has a concern or sees something that is not in line with our policies, our standards, or the law. We also expect our suppliers to provide a grievance mechanism for their workers to raise occupational concerns. Concerns can be reported as part of Speak Up through the following channels: telephone, web portal, e-mail, or mail. These channels are managed independently of Haleon and are available globally in multiple languages. Links for these channels can be found [here](#).

When we receive a concern through Speak Up, we apply our investigative principles of humanity, confidentiality, proportionality and safeguarding to the matter raised. The cases are assessed promptly by the Incident Classification group, which is comprised of members of the Global Investigation, HR, Compliance and Legal teams. Stakeholders including Forensics are brought in where necessary to advise on specific concerns. Once we have established the facts,

we ensure that the concern is addressed in an appropriate way. At the end of the process, we give feedback to the person who reported the concern, even if we are unable to share the outcome in detail for confidentiality reasons.

## Remediation activities

### Labour providers

As mentioned above, in 2023 we undertook an assessment of third party labour provision at three of our own manufacturing sites. This assessment identified certain areas for improvement relating to oversight of the third party workforce working on site, including the monitoring of working hours. In response to this we have implemented a detailed action plan that includes more stringent screening of labour suppliers, increased due diligence in high-risk regions, stronger contractual obligations on suppliers, and ongoing monitoring of our own sites and third party workforce.

### Raw material suppliers

As described above, we have focused on key agricultural, forest, and marine-derived raw materials as part of our sustainable sourcing programme to seek to mitigate potential human rights and environmental risks within these supply chains. Where we consider



# Remediation **continued**

our ability to influence remediation to be relatively low, we adopt a collaborative approach, working with industry bodies to amplify our leverage. In particular, we have worked with partner organisations to seek to reduce human rights risks in our mint and palm oil supply chains.

- Our Healthy Mint Supply Chain Programme, launched in 2023, is enabling us to engage with our mint supply chain by developing a variety of projects with our suppliers and Non-Governmental Organisations (NGOs), working within mint farming communities in Uttar Pradesh, India. We are aiming to uphold health and safety standards in mint farming, improve farmers' livelihoods and support better health in mint growing communities, whilst reducing the environmental impact of mint production.

Through 2 pilot programmes with key suppliers in 2023, the first 683 mint farmers were onboarded and supported with a range of interventions such as: training in sustainable agricultural practices; integrated pest and disease management and early mint technology; distribution of quality mint planting material; and establishing mint nurseries and compost pits. From this early pilot work, we have already seen benefits to farmer livelihoods, aligning to the programmes' aims. These benefits

include increases in yield from their mint crop and high levels of satisfaction from the level of support they receive from the programmes. Moving forward, we are expanding this work in 2024 by increasing the scale of the first 2 programmes and launching a third, through which we expect, by the end of 2024, to have over 6000 farmers onboarded and supported with interventions. Further plans include targeted training on health and safety practices.

- In addition, we are investing in two ASD projects. Through the ASD Impact Fund, we are supporting Kaleka's Mosaik Initiative, which is working to empower local palm-producing communities, by training 614 farmers to achieve Roundtable on Sustainable Palm Oil (RSPO) certification in 2023 and by training farmers on growing additional cash crops. Through ASD we are also supporting the 'Respect in Palm' project in Indonesia which aims to prevent and respond to gender-based violence and sexual harassment in palm oil concessions in Indonesia. The project, led by Business for Social Responsibility, works with workers, supervisors, and management at palm concessions to promote more gender equitable attitudes and relationships.

Work with ASD has also included receiving operational and strategic risk monitoring of our palm oil value chains. Sourced from key stakeholders and experts, this enables us to engage suppliers on high priority grievances, including those focused on human rights, raised by third parties (e.g. campaigning groups) in order to gain an understanding of the situation on the ground, any mitigation processes in place and any further actions that might be required.

- We aim to ensure that our agricultural and forestry-derived materials are supplied from sources where human rights risks are minimised, by expecting our suppliers to supply agricultural materials with leading sustainable sourcing certifications where available. Such standards include the requirement to respect and uphold human rights as part of the certification process and standard. The standards include the RSPO Mass Balance certification for palm oil derivatives, and Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC) for sustainably sourced paper and board. We are also seeking to set clear standards for how we source and certify other key agricultural, forestry and marine-derived materials where there is not yet an established industry-wide standard.



# Training, Awareness and Capacity Building.

Building capability in understanding human rights is key to our human rights strategy. In 2023 we developed an e-learning module introducing human rights at Haleon, available in 16 languages, which is available to all employees and third party workers with access to a laptop.

The training will be rolled out to key functions across the business in 2024. An accompanying facilitator's pack has been shared with our manufacturing sites for employees and third party workers without computer access.

All employees and third party workers are provided with mandatory training on our Code of Conduct which includes information on human rights and how to report concerns. In addition, as noted above, training was provided to relevant teams on the new Human Rights Incident Response and Communications Plan.

Throughout 2023, the Human Rights team has engaged the business on a range of human rights issues, including modern slavery, forced labour, decent work and child labour issues, in a number of ways. Both the saliency assessment process and the annual risk assessment provided opportunities to engage with teams across the business where human rights issues might not normally be raised. These interactions have enabled us to explain our commitment to respect human rights, to discuss the challenges facing global businesses such as Haleon, and to explore questions about what it means to be a responsible company.

The roll out of the Sedex platform has also provided an excellent opportunity to engage with our manufacturing sites, and to build awareness of our human rights commitments and capacity to uphold them. Training has been provided to support our sites through this process.

We are members of several industry groups, supporting peer learning and exchange of good practice. These include the UN Global Compact; the Pharmaceutical Supply Chain Initiative (PSCI) Human Rights Working Group; and AIM Progress, a forum of leading Fast Moving Consumer Goods (FMCG) companies and common suppliers, who promote responsible sourcing practices and sustainable supply chains. AIM Progress is supported and sponsored by AIM, the European Brands Association.





# Measuring the effectiveness of our actions.

During 2023, our own manufacturing sites completed the Sedex Self-Assessment Questionnaire, which measures performance against a range of human rights, environmental and business ethics areas. These results have provided a baseline for our sites against which we can measure progress going forward.

Following the completion of the Sedex Self-Assessment Questionnaire we also identified opportunities for improvement at site level and at group level. Progress against these areas will be measured in 2024.

Following the roll-out of Sedex to our suppliers, we will be developing more metrics to track implementation of our programmes and their results.

## Communicating our impacts

Haleon communicates its work on human rights in several ways:

- Legally mandated reports such as this Statement.
- Summary information in our 2023 Annual Report and Form 20-F on page 20.
- Information in our 2023 Responsible Business Report on pages 53 and 54.
- Information on our website in our wider ESG communication pages and our ESG Reporting pages found [here](#).

## Right to information

The Norwegian Transparency Act entitles third parties to request information from Haleon Norway AS (Haleon Norway) concerning how it addresses actual and potential adverse impacts on fundamental human rights and decent working conditions that Haleon Norway has either caused or contributed to, or that are directly linked with Haleon Norway's operations or products via its supply chain or business partners. To support these written requests, we have set up a dedicated email address: [human.rights@haleon.com](mailto:human.rights@haleon.com)





# Annex: Further details of specific Haleon businesses.

## Haleon in Norway

(For the purposes of the Norwegian Transparency Act)

Haleon's activity in Norway is operated by Haleon Norway AS (Haleon Norway) and is focused on sales and distribution of our products. It has a network of suppliers, distributors and customers across Norway to enable its products to be available in pharmacies, supermarkets, and online retailers throughout the country.

Haleon Norway offers a range of products for various health needs to consumers in Norway, including pain relief (Panodil, Voltarol), cough and cold (Otrivin), digestive health (Idoform), wellness (Nicotinell) and oral health (Sensodyne, parodontax, Corega).

The products sold by Haleon Norway are manufactured by Haleon's own global network of manufacturing factories as well as by some third party manufacturing organisations (CMOs). 115 different product stock keeping units were sold by Haleon Norway during 2023, and these were manufactured by 5 Haleon factories based in Switzerland, Italy, Slovakia, UK and Ireland, and 8 CMOs based in Belgium, Denmark (2), Germany (2), Italy, Spain, and Switzerland. Haleon Norway also uses 1 logistics supplier, headquartered in Denmark.

## Haleon in Canada

(For the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2022)

Haleon's activity in Canada is operated by Haleon Canada ULC/Haleon Canada SRI (Haleon Canada) and PF Consumer Healthcare Canada ULC/PF Soins De Santé SRI (PF Consumer Healthcare)

Haleon Canada's activity is focused on sales and distribution of our products and it has a network of suppliers, distributors and customers across Canada to enable its products to be available in pharmacies, supermarkets, and online retailers throughout the country.

In addition to the above, PF Consumer Healthcare owns a manufacturing facility located in Saint-Laurent, Québec which manufactures Haleon products for local Canadian sales/consumption as well as for export to the United States and internationally.

Haleon Canada offers a range of products for various health needs, including pain relief (Advil, Voltaren), cough and cold (Advil cold products, Otrivin), digestive health (Tums), wellness (Centrum) and oral health (Sensodyne, Polident, Aquafresh).

The products sold by Haleon Canada are manufactured by Haleon's own global network of manufacturing factories as well as by some third party manufacturing organisations (CMOs). 427 different

product stock keeping units were sold by Haleon Canada during 2023, and these were manufactured by 8 Haleon factories based in Canada, USA, Slovakia, South Africa and Ireland, and 27 CMOs based in Canada, USA, Switzerland, France, UK and India. Haleon Canada also used 1 logistics supplier, headquartered in Vaughan, Ontario.

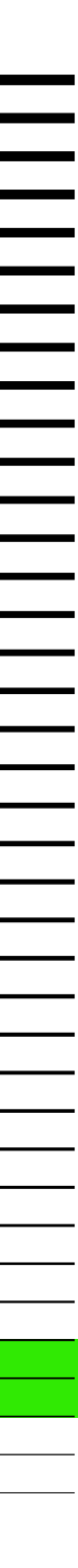
## Haleon in Australia

(For the purposes of the Australian Modern Slavery Act 2018)

Haleon's activity in Australia is operated by Haleon Australia Pty Ltd (Haleon Australia) and is focused on sales and distribution of our products. It has a network of suppliers, distributors and customers across Australia to ensure its products are available in pharmacies, supermarkets, and online retailers throughout the country.

Haleon Australia offers a range of products for various health needs to consumers in Australia, including pain relief (Panadol, Advil and Voltaren), oral health (Sensodyne) and wellness (Centrum).

The products sold by Haleon Australia are manufactured by Haleon's own global network of manufacturing factories (11) as well as by some third party manufacturing organisations (CMOs) which are local (4) and internationally-based (28). Haleon Australia uses 1 logistics supplier based in Sydney.



# HALEON



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