

**Gilead Sciences Norway AS**

**Transparency Act Statement**

**2025**



# Introduction

This Statement is made in accordance with the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the "Transparency Act"), which requires companies to report steps taken to ensure compliance with fundamental human rights and decent working conditions.

This report refers to the 2024 fiscal year, being January 1, 2024, to December 31, 2024. This report is for Gilead Sciences Norway AS ("Gilead Norway"). The statement sets out our work on human rights due diligence to ensure respect for fundamental human rights and decent working conditions in our own business and in our supply chain.

Gilead Norway is a wholly owned subsidiary of Gilead Sciences, Inc. ("Gilead US"). References to 'Gilead', 'we', 'us' and 'our' refer to the Gilead group more broadly, of which Gilead Norway is a part.

## **A. Gilead business operations, policies and procedures related to fundamental human rights and decent working conditions**

### **Our business and supply chains**

Gilead is committed to creating a healthier world for all people, and has a mission to discover, develop and deliver innovative therapeutics for people with life-threatening diseases through bold and transformative sciences.

Globally, Gilead's principal business activity is the development, manufacture, sale and distribution of pharmaceutical products for human healthcare. We also strive to remedy health inequities and break down barriers to care. Gilead is working with communities and partners around the world to improve healthcare access, eliminate the disparities and barriers to care encountered by underserved populations, and advance health equity that endures.

Gilead operates in a highly regulated environment. Gilead sells pharmaceutical products to hospitals, retail pharmacies and other healthcare providers in Norway, US and worldwide.

Gilead's global headquarters are located in Foster City, California. Gilead operates and manages its subsidiaries through global policies, systems and processes that are designed to ensure consistency across the group, including third party contract governance, audit processes and oversight.

Gilead's supply chain includes hundreds of direct suppliers and thousands of indirect suppliers across the globe. Gilead's operations in Norway are focused on enabling patient access to Gilead products and resale of final products to local wholesalers and government facilities in Norway. As of December 31, 2024, Gilead Norway had six employees, all field based, with roles in Medical, Sales and Market Access. Gilead Norway does not manufacture any Gilead products.

Gilead recognizes the importance of fundamental human rights, decent working conditions as well as the seriousness and importance of combatting modern slavery, forced and child labour, and human trafficking. Gilead is committed to fully understanding and taking all appropriate action to address any risks related to fundamental human rights and decent working conditions, including any risks related to slavery and human trafficking, in our own business and in our supply chains.

We seek to conduct our business in a manner that respects the human rights and dignity of people. Each of us can play a role in the elimination of human rights abuses such as forced and child labour, slavery and human trafficking, and forced labour. We support and respect the protection of human rights and expect that our suppliers and business partners do the same.

More information on Gilead's business and our commitment to responsible business principles can be found in Gilead's 2024 Responsible Business and Impact Report.

## **Manufacturing and Production**

Gilead uses a combination of company owned facilities and strategic third-party partners to manufacture and distribute products worldwide. Gilead has manufacturing sites located in the United States, Ireland, Netherlands and Canada.

As part of our procurement and supply-chain strategy, we employ responsible sourcing, supplier inclusion, auditing procedures, green chemistry and sustainable manufacturing and distribution principles to minimize the impact from our procurement and supply chain practices.

Gilead's suppliers for active pharmaceutical ingredients (APIs) and drug products are expected to observe Good Manufacturing Practice (GMP) regulations as required by the FDA and other relevant health authorities worldwide. GMP covers all aspects of production including manufacturing procedures, testing methods, maintenance of premises and equipment, training, personal hygiene of staff and appropriate documentation.

## **Gilead's Employees**

Gilead believes that risks related to human rights and decent working conditions in our directly employed workforce is relatively low. This is due in part to the highly regulated nature of the pharmaceutical industry, and also to our employees being largely educated or skilled, and/or undertaking work in controlled environments such as Gilead offices and laboratories. Nevertheless, we recognise that there is a risk that needs to be addressed. One way we have addressed this risk is by reorganising the way we carry out the recruitment of our directly employed workforce. We have consolidated our recruitment supply base so that we now work closely with only a few strategic partners on a global basis, rather than with a large number of third-party recruitment agencies.

Gilead has strengthened workplace inclusivity by creating a new Disability Inclusion Employee Resource Group, one of many resource groups across the company that represent the Gilead commitment to inclusion and a culture that empowers every individual to reach their full potential.

## **Code of Ethics**

Gilead's Core Values are integrity, teamwork, accountability, inclusion and excellence, embedding respect for human rights and labour rights across the business. This includes demonstrating ethical and moral conduct, as well as adhering to laws, regulations, and company policies. The Core Values, in particular the values of integrity and accountability, are interwoven throughout Gilead's Code of Ethics, which all employees, officers, directors and contractors of Gilead, its affiliates and subsidiaries (collectively "Gilead Personnel") are expected to comply with. Gilead also expects all third parties performing services for us, or with whom we partner or collaborate, to act in a way which is consistent with the principles in our Code of Ethics. The Code of Ethics features a section on Commitment to Human Rights which states that we seek to conduct our business in a manner that respects the human rights and dignity of people and that each of us can play a role in the elimination of human rights abuses such as child labour, slavery and human trafficking, and forced labor. The expectation within the Code is for Gilead Personnel to support and respect the protection of human rights and ensure that suppliers and business partners do the same.

## **Procedures for Reporting, Investigating Concerns and Internal Accountability**

Gilead Personnel are required to report potential violations of laws, regulations, company policies (including the Gilead Code of Ethics) and any other serious wrongdoing within Gilead. To facilitate disclosures and help protect anonymity, Gilead Personnel can report any concerns through Gilead's Ethics Hotline. Gilead investigates all allegations of misconduct and circumstances that implicate potential violations of laws, regulations or company policies. Violations are not tolerated and can lead to disciplinary action, including termination of employment (where applicable).

## **Supplier Code of Conduct**

As part of our procurement and supply-chain strategy, we employ responsible sourcing, supplier inclusion, auditing procedures, green chemistry and sustainable manufacturing and distribution principles to minimize the impact from our procurement and supply chain practices.

At Gilead, we are committed to maintaining the highest standards of legal and ethical conduct and we expect the same of our suppliers. We endeavour to select suppliers who share these standards. Gilead maintains a Code of Conduct for suppliers ("Supplier Code of Conduct"), reflecting the business practices and principles of behavior that support this commitment. It should be considered against the backdrop of Gilead's corporate core values of Integrity, Teamwork, Accountability, Inclusion and Excellence. The Supplier Code of Conduct stipulates that suppliers are expected to comply with applicable laws and regulations. Notably, the Supplier Code of Conduct outlines that suppliers shall support the protection of internationally proclaimed human rights and ensure they are not complicit in any abuses of human rights, and specifically that suppliers shall not use child labour, forced labour, or human trafficking.

The Supplier Code of Conduct outlines, in addition to complying with applicable laws, each of us is required to apply common sense, together with our own highest personal ethical standards, in making business decisions where there is no stated guideline in the Supplier Code of Conduct. Unyielding personal integrity is the foundation of corporate integrity.

Gilead updated the Supplier Code of Conduct in March 2024 to further strength its commitment to human rights. In 2022, Gilead US initiated an enterprise-wide reassessment of how to ensure broader adoption of our Supplier Code of Conduct. Since that time, Gilead has made further improvements to processes, including follow-up on adherence to the Supplier Code of Conduct as further described below.

The Supplier Code of Conduct is available to all Gilead suppliers to access on Gilead US's website, and steps are underway to strengthen the dissemination processes, primarily through enhanced onboarding and contract templates.

### **Supplier Certification**

Gilead expects its suppliers to apply the principles of the Supplier Code of Conduct during the performance of each supplier's responsibilities. As Gilead's business expands into new markets and supply chains, Gilead has translated its Supplier Code of Conduct into ten languages. The Supplier Code of Conduct can therefore be shared with prospective suppliers globally and used as part of the supplier selection process. Refusal by a supplier to commit to the Supplier Code of Conduct's principles is an important factor in deciding whether to do business with a supplier.

Gilead has implemented processes for new suppliers to read and acknowledge Gilead's Supplier Code of Conduct during the supplier onboarding process and intends to continue to expand this program.

## **B. Information regarding actual adverse impacts and significant risks of adverse impacts identified through due diligence**

Gilead conducts annual assessments of risks to our supply chain and ongoing monitoring for adverse impacts for key suppliers, identified high risk areas in our operations, and during supplier audit activities. Though no actual adverse impacts were identified during the most recent calendar year, significant risks are known to be present in the supply chains of all pharmaceutical companies, including Gilead. Within our own operations, these risks are minimized due to the nature of our business, where operations require highly skilled and/or specialized labor and operations.

Within our direct supply base, the greatest area of identified inherent risk is tier two and beyond, where limited visibility, and multi-national complex supply chains that may extend into countries are characterized as representing an inherent risk. Notably, presence of high risk groups such as contract or seasonal workers, migrant workers, and other low status groups can be difficult to detect through traditional labor and facility audit practices, especially for purchased goods and services such as mined materials.

Pharmaceutical sector-specific risk assessments, such as the Supply Chain Materiality in 2024 Assessment from the Pharmaceutical Supply Chain Initiative does not identify labor rights as a material issue, indicating that labor concerns do not have an especially high relevance to pharma.

## **C. Measures to mitigate risks of adverse impacts, and the expected results of these measures**

As part of Gilead group's procurement and supply-chain strategy, Gilead has responsible sourcing processes in place to minimize the impact from its procurement and supply chain practices.

Gilead recognizes that exposure to the risk of modern slavery increases when we engage with third parties, particularly in such areas of our business as catering, cleaning, transportation, protective equipment and clothing, warehousing, construction, manufacturing, packaging and promotional goods suppliers. Specific to the pharmaceutical industry, our raw materials are diverse, and are sourced from around the world. Our due diligence procedures include mapping and assessing our supply chain's exposure so that any mitigation efforts are directed towards locations and activities with the highest risks, however, these are not explicitly associated with forced and child labour in all instances. Gilead does not perform holistic supply chain mapping that includes partners of our supply chain network and other service providers that our supply chain depends on.

Gilead uses the policies and processes outlined above to assess and manage the risks of slavery, human trafficking, forced and child labour in its supply chains. In addition, the below initiatives are undertaken.

Gilead US invests in cross-industry collaboration as part of our ongoing efforts to address a wide range of global challenges that affect communities worldwide. Gilead US has chosen to join other like-minded companies in support of the United Nations Global Compact (UNGC) – a voluntary initiative that is designed to align industries in the name of human rights, labour standards, environmental protection and anti-corruption practices. Gilead is integrating the UNGC principles into our strategy, culture and day-to-day operations.

Additionally, Gilead is committed to responsible supply chain practices. Gilead US joined the Pharmaceutical Supply Chain Initiative ("PSCI") in 2018. The PSCI has developed standards on six issues common in supply chains: (1) Freely Chosen Employment, (2) Child Labour and Young Workers, (3) Non-Discrimination, (4) Fair Treatment, (5) Wages, Benefits, and Working Hours, and (6) Freedom of Association. These standards set our expectations on these issues. As a member of PSCI, Gilead promotes responsible practices that will continuously improve social, health, safety and environmentally sustainable outcomes. Gilead US actively participates in PSCI committees, driving positive change within Gilead, and across the pharmaceutical industry through collaborative efforts with peer member companies. Gilead US's involvement with PSCI continues to shape our implementation of best practices, as outlined further below.

### **Supplier Code of Conduct**

Gilead updated the Supplier Code of Conduct in March 2024 to further strength its commitment to human rights. In 2022, Gilead US initiated an enterprise-wide reassessment of how to ensure broader adoption of our Supplier Code of Conduct. Since that time, Gilead has made further improvements to processes including follow-up on adherence to the Supplier Code of Conduct. Willingness of prospective suppliers to comply with the Supplier Code of Conduct is considered as a selection criteria in many procurement processes, and adherence to the Supplier Code of

Conduct is expressly considered during annual business reviews with select suppliers. Gilead has also implemented additional procedures such as conducting gap assessments and prioritizing further engagement with suppliers that have not yet signed.

The Supplier Code of Conduct is available to all Gilead suppliers to access on Gilead US's website, and steps are underway to strengthen the dissemination processes, primarily through enhanced onboarding and contract templates.

### **Supplier Certification**

Gilead has been working towards automating request for all new suppliers to read and acknowledge Gilead's Supplier Code of Conduct during the supplier onboarding process. Gilead has implemented such requirements to read and acknowledge Gilead's Supplier Code of Conduct during the supplier onboarding process and intends to continue to expand this program. This is primarily accomplished through incorporating our Supplier Code of Conduct into global contracting templates, as well as embedding acknowledgement into supplier onboarding processes, and building automated systems and procedures to autonomously collect and manage these requirements with new and existing suppliers.

Contractual arrangements between Gilead and our suppliers stipulate compliance with applicable law and regulations, including local and international legislation such as the Trafficking Victims Protection Act. Gilead is entitled to terminate supplier contracts where suppliers have not met their contractual obligations. Gilead encourages suppliers to use management systems to facilitate continual improvement and compliance with the expectations of the Supplier Code of Conduct, and to identify, assess and manage risks in all areas. As of 2024, a majority of Gilead's sourceable spend is with suppliers who have acknowledged the Supplier Code of Conduct.

### **Remediation measures**

There have been no identified or reported instances of forced labour or child labour in Gilead's supply chain. Therefore, Gilead has taken no measures to remediate any forced or child labour or any measures to remediate the loss of income to the most vulnerable families resulting from such measures.

### **Training provided to employees on forced labour and child labour**

Gilead Norway does not currently have training in place that specifically addresses human rights and decent working conditions. In 2024, training was implemented for key personnel in Gilead US and plans to expand the reach of this training are underway.

All Gilead employees are required to complete training on Gilead's Code of Ethics.

## **Effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

Gilead is continuing the development of its program to prevent forced and child labour, modern slavery and human trafficking in 2025. In doing so, we will review measures to assess the effectiveness of the processes already in place through auditing described below, as well as consider what additional measures may be implemented.

Gilead monitors its suppliers as part of our supplier relationship management programs. This may involve routine in-person meetings between Gilead management and our suppliers where appropriate.

Gilead uses its own Gilead Personnel and, also in certain circumstances, independent third parties, to carry out regular and ad-hoc audits and site inspections of our manufacturing and packaging suppliers to ensure compliance with quality agreements (note: Gilead Alberta and Gilead Canada do not typically separately conduct audits of their suppliers). These suppliers may also be subject to ad-hoc audits and inspection by government authorities.

Forced and child labour, slavery and human trafficking are now specifically considered in certain Gilead audits, and Gilead Personnel conducting these audits are expected to escalate any such observations or suspicions immediately.

Gilead engages in supplier assessment which aids Gilead in addressing social and ethical risks (including health and safety; human trafficking; modern slavery, including forced, bonded, involuntary prison and child labour; discrimination and unfair treatment; and business integrity), environmental, operational and other risks within its supply chain.

Gilead should be satisfied that suppliers protect workers as evidenced through health and safety performance and by other means, including verification of the management framework for accident or injury, investigation and checks on incident records during onsite assessments of suppliers, and satisfying ourselves that worker protection is under the direction of clearly identified and accountable individuals possessing the appropriate technical and managerial skills, training and knowledge.

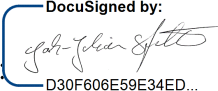
In 2024, we have begun work to harmonize minimum due diligence standards associated with Human Rights across all purchased goods and services. Gilead will undertake a risk-based supplier assessment audits using the Pharmaceutical Supply Chain Initiative (“PSCI”) resources and approaches. These PSCI audits generally consider all or part of the pillars described in the PSCI Principles (i.e. Ethics, Labor & Human Rights, Health & Safety, Environment and Management Systems) and in the PSCI Audit Guidance. We continue to evaluate the most practicable and effective ways to ensure compliance and continual improvement amongst our value chain partners. As part of these enhancements in 2025, we are exploring prescriptive mitigation and prevention measures and working on integrating Human Rights Due diligence into existing supplier management processes.



## Approval and Attestation

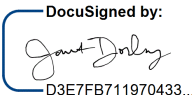
This statement is made pursuant to the Norwegian Transparency Act in respect of Gilead Sciences Norway AS and constitutes the statement related to human rights and decent working condition for the 2024 financial year, ending 31 December 2024, and sets out the steps taken to identify and address risks related to human rights and decent working conditions in our business and supply chain.

The statement is approved by the board of directors and General Manager of Gilead Sciences Norway AS and signed by the directors and General Manager of this company.

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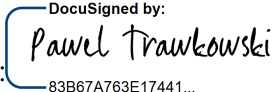
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Vice President International Legal  
Director Gilead Sciences Norway AS

Date: Juni 20, 2025 | 3:20:03 AM PDT

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Pawel Trawkowski  
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Date: June 25, 2025 | 5:07:18 AM PDT

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Pau Arbos  
General Manager, Gilead Sciences Norway AS

Date: June 19, 2025 | 11:56:43 AM BST