

Modern Slavery Statement

Introduction

This statement relates to actions taken during the financial year 1st January 2023 to 31st December 2023.

This statement details the actions taken by Thornton & Ross Ltd (T&R) to understand the modern slavery risks related to its business and to ensure that as far as possible there is no human trafficking or slavery in its own business and in its supply chain.

The Company acknowledges its responsibilities under the Modern Slavery Act 2015 (the Act) and seeks to ensure that conditions for its employees are of a good standard and that none of our practices infringe any legal or ethical requirements. The Company takes a zero-tolerance approach to slavery and human trafficking in its business activity and attempts, as far as is reasonably practical, to ensure that there is no slavery or human trafficking in the supply chain.

At the heart of the organisations' culture are our values of Agility, Entrepreneurship, One STADA and Integrity which ensures we work to avoid working with organisations that may not comply with the Act.

Organisational Structure

T&R develop, manufacture, and supply a wide and growing range of branded over-the-counter medicines, dermatological products, generic medicines including biosimilars and other pharmaceutical and household products. The Company was originally a family-owned business until it was acquired in 2013 by STADA Arzneimittel AG (STADA Group). T&R was founded in 1922 and is one of the largest 'over-the-counter' medicines manufacturers in the UK.

Our approach is to combine good, responsive customer service and quality products in a working environment that encourages innovation.

Our business operates in the UK with the majority of our employees based at our two Huddersfield sites – the UK Head Office in Slaithwaite and our manufacturing site in Linthwaite. The organisation is structured in two defined areas – Technical Operations (manufacturing and production) and Commercial (Consumer Dermatology, Home Hygiene, OTC, and Prescription Pharmaceuticals).

The responsibility for procurement lies with the Procurement team who have a dual reporting function with a direct line to the VP of UK Technical Operations as well as the Global Procurement Team within the STADA Group.

Our suppliers are (where possible) local businesses, although due to the specialised nature of certain pharmaceutical products, ingredients and processes and the limitations to the number of suppliers in the pharmaceutical and consumer health market, we also buy from businesses around the world.

The procurement team that manages both the indirect and direct supply chain for our Company maintain close working relationships with our suppliers and work collaboratively with global procurement in the STADA Group.

Governance

Thornton & Ross remains steadfast in its dedication to upholding and strengthening its business integrity. As part of this enduring commitment, our Head of Compliance provides invaluable support and guidance in navigating our daily operations in an ethical and Compliant manner.

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Continuing from our previous statement, we persist in utilizing our Strategic Compliance Framework and the oversight of our Compliance Committee to uphold our obligations. This committee, chaired by the GM and comprised of senior executives, actively engages in compliance training and regular dialogues with our Head of Compliance to ensure comprehensive oversight.

Throughout 2023, we conducted 14 supplier audits, overseen by our quality function, and implemented enhanced onboarding processes to ensure strict adherence to human rights standards. Additionally, we are pleased to report the successful completion of a SEDEX audit, underscoring our commitment to ethical practices and accountability.

Supply Chain Due Diligence

T&R purchase packaging materials, chemicals, and active pharmaceutical ingredients (API) from third party suppliers. Other products are secured from contract manufacturing organisations for brands that T&R holds the marketing authorization for or in some cases T&R buys in finished products for resale. In addition, we also outsource some packaging activity to contract manufacturers. Suppliers must complete and return an evaluation questionnaire before we enter any contractual negotiations or formal contract. Each supplier is required to provide information on labour conditions, compliance with national laws, hygiene facilities, discrimination, and child labour as well as regulatory compliance.

As the Company purchases materials from around the world, we monitor our suppliers and the conditions for their staff, both by assessing the presence of human trafficking and slavery in their operations, and by visiting their plants to observe their business practices and local conditions. All suppliers are categorised, and risk reviewed on an on-going basis.

If concerns are raised, then we will review these with the supplier with the aim of raising awareness and making the required improvements. Ultimately if progress is not made, we will cease to trade with that supplier.

We do not have any direct supply agreements with any organisations within the 10 countries with the highest prevalence of modern slavery, as identified by the Global Slavery index.

Training

T&R ensures all senior managers and employees within the procurement department are trained on the Modern Slavery Act 2015. This training is delivered via online digital training.

Approval

We are committed to continuous improvement in our efforts to identify, prevent and remedy human rights abuses in our supply chain. As we make further progress in the above areas, we will report on that progress through subsequent versions of this statement.

This statement has been adopted and approved by the Thornton & Ross Leadership team (SEC) on the 4th April 2024.



Nigel Stephenson
Director
Thornton & Ross Ltd