



## Thornton & Ross Ltd – Modern Slavery Act 2015

### Introduction

This statement relates to actions taken during the financial year 1 January 2020 to 31<sup>st</sup> December 2020.

This statement details the actions taken by Thornton & Ross Ltd (**T&R**) part of the STADA group 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 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 (now owned by private equity) (**STADA Group**). T&R was founded in 1922 and is one of the largest 'over-the-counter' 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 site in Huddersfield or in technical operations, for our sales force, operating around the UK. The organisation is structured around manufacturing i.e. technical operations and commercial who are organized around consumer dermatology, home hygiene, OTC and prescription pharmaceuticals



The responsibility for procurement lies in the procurement team which has 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 working collaboratively with global procurement in the STADA Group.

### **Supply Chain Due Diligence**

T&R purchase packaging materials, chemicals and active pharmaceutical (API) ingredients from third party suppliers. Other brands are secured from contract manufacturing organisations for products 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 any contractual negotiations are entered into or enter into a 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 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 that 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**

This statement has been approved by the Executive Vice President of Thornton & Ross Limited on behalf of the Company. The statement will be reviewed and, where necessary, updated on an annual basis.

A handwritten signature in black ink, appearing to read 'Roger Scarlett-Smith'.

**Mr Roger Scarlett-Smith**  
**Executive VP UK & US**  
**Thornton & Ross Ltd**