

MODERN SLAVERY STATEMENT 2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and comprises the modern slavery and human trafficking statement of Thornton & Ross Limited and its subsidiaries (“**T&R**”, “**we**”, “**us**” or “**our**”) during the financial year from 1 January 2024 to 31 December 2024. This statement sets out the steps taken by T&R to understand the risks inherent in our business and ensure modern slavery and human trafficking are not taking place within our business operations or supply chain.

Who Are Thornton & Ross Limited: Our Business, Organisational Structure and Culture

T&R is a healthcare business with a clear Purpose: Caring for People’s Health as a Trusted Partner. In pursuit of this Purpose, we engage in business related to the development, manufacture, and supply of various home and healthcare products within the following three pillars: (i) Consumer Healthcare (including over-the-counter (OTC) medicines, dermatological products and home hygiene products), (ii) Generic medicines and (iii) Speciality medicines (including various innovative and biosimilar medicines). Our operational focus combines responsive customer service with high-quality products, fostering an environment that promotes innovation.

Established in 1922, Thornton & Ross Limited was originally a small family-owned business, which became part of the STADA Group when it was acquired by pharmaceutical company STADA Arzneimittel AG (“**STADA AG**”) through an acquisition in 2013. STADA AG is based in Germany and is the indirect parent company of Thornton & Ross Limited. STADA AG is a private equity owned company, with majority shareholders being Bain Capital Investors, LLC and Cinven Partnership LLP.

T&R is based in the UK and employs around 700 people. Most of our workforce are primarily based at one of our two sites in Huddersfield: the UK Commercial Head Office in Slaithwaite and our manufacturing facility in Linthwaite. T&R is structured into two main divisions: Technical Operations (manufacturing and production) and Commercial (including Consumer Dermatology, Home Hygiene, OTC, and Prescription Pharmaceuticals). T&R sells its products in the UK and in various countries worldwide, either itself or via its affiliate network within the STADA Group or local distributors, depending upon the territory.

Our dedicated purchasing team manages our sourcing and procurement processes for all products and services, maintaining direct reporting lines to both the VP of UK Technical Operations and the Global Procurement Team of the STADA Group.

T&R promotes an open and ethical culture, adopting four core Values: Agility, Entrepreneurship, One STADA and Integrity. These four Values are central to our culture and they guide us in the way we do business, including who we partner with.

Governance

As part of our commitment to our Purpose and our Integrity value, we are firmly committed to doing business in the right way and in compliance with all ethical and legal requirements, including human rights standards. We care about the workers who contribute to our business not only in our direct facilities, but also those engaged by third parties that we work with. We believe robust ethical governance is a crucial part of demonstrating our strong commitment to our Purpose and Values, which guide us in everything we do.

Legal & Compliance Departments

To demonstrate our commitment to ethical governance, our Legal & Compliance Departments oversee the generation of our modern slavery statement and have been identified as critical in providing governance and guidance to ensure ethical and compliant practices across our business. Our Legal & Compliance Departments have been strengthened in 2024 through the appointment of a new UK Head of Legal & Compliance. This role sits on the UK Leadership team for T&R and attends strategic leadership meetings to ensure compliance and ethical topics, including modern slavery, remain crucial considerations in our business strategies, processes and decisions.

T&R further embodies its dedication to compliance topics through the implementation and continued operation of its Strategic Compliance Framework, which outlines T&R's compliance programme, strategy and commitments. Oversight of this programme is provided by our Compliance Committee, which is chaired by the UK General Manager and Head of Legal & Compliance, with team members composed of senior executives within the business. This Compliance Committee meets on a quarterly basis to ensure that compliance and legal topics are raised, reviewed and addressed to provide compliance governance across our business, including in relation to the prevention of forced labour.

Our Policies and Procedures

There are a number of policies aimed at respecting human rights which apply to T&R, including both STADA Global policies and specific local T&R policies:

- STADA Group has a Code of Conduct for Employees of STADA Group, which T&R employees are bound to comply with. This outlines various values and principles which employees must adhere to in carrying out their roles in a legal and ethical way, including labour law considerations, plus what to do if there are suspected violations.
- T&R has a Human Rights Policy outlining our commitments to ethical working practices, human rights and compliance with labour rights and laws. This outlines the position we take and principles we follow in complying with human rights considerations in our business operations.
- The STADA Responsible Procurement Policy applies to T&R, which sets out the requirements which are complied with by T&R in its procurement of goods and services to ensure responsible and ethical procurement practices. This policy addresses the risks around modern slavery and human trafficking in our extended business operations. Potential suppliers are assessed through a third-party platform we use called EcoVadis and our suppliers must accept our STADA Business Partners Code of Conduct to be added to our approved suppliers list. Our Business Partner Code of Conduct includes various requirements, including acceptance of principles related to Ethics, Labour & Human Rights and Health & Safety.
- STADA Group operates a Whistleblowing Policy which applies to T&R, providing guidance on how concerns and violations regarding our business operations can be raised. We provide various ways for both employees and third parties to confidentially raise their concerns or potential breaches of law which can be reported to a dedicated Compliance email account or via our Compliance Reporting Portal, which is an online reporting tool

where matters can be reported in a confidential and anonymous way. Our policy is clear that there will be no retaliation against whistleblowers who choose to raise concerns in good faith supported with reasonable grounds. Our Whistleblower policy is an important initiative which allows people to feel empowered to identify issues or concerns about our business practices.

We regularly review and update our policies to ensure continued compliance with relevant guidance, laws and regulations. All of these policies are freely available to employees on our internal intranet.

Audits

- In 2024, T&R conducted 11 supplier quality audits under the supervision of our Quality Assurance team, along with 4 independent audits which were performed by third-party auditors. Additionally, our STADA Global Audit Team carried out 57 quality audits which were of interest to T&R across various categories, including CMO manufacturers, API manufacturers, packaging manufacturers, secondary packaging sites and QP release locations. Although these audits were Quality-led audits not specifically aimed at identifying labour or human rights issues, on-site audits do provide an important opportunity for supplier factory conditions to be observed and potential issues or other red flags to be identified.
- T&R participates in annual SEDEX SMETA audits which assess compliance to ethical standards including labour, health & safety and environmental performance. In February 2024, we completed a SEDEX SMETA audit at our Linthwaite manufacturing site conducted by the BSI Group, demonstrating our commitment to ethical practices and accountability.

Supply Chain and Due Diligence

Overview

T&R procures various direct and indirect goods and services from third parties as part of its business model. T&R procures packaging materials, raw materials and active pharmaceutical ingredients (APIs) for our products from third party suppliers. Whilst we do manufacture some products ourselves in our Linthwaite manufacturing facility, we also utilise the services of contract manufacturers to produce elements of some products on our behalf or we may purchase in finished products for resale. Some of our service activities are also outsourced including packaging activities, warehousing & logistics and freight forwarding services.

In addition to the procurement of goods and services related to our products, we also use third parties to provide us with goods and services related to indirect procurement including marketing, advertising, recruitment and legal services to name a few.

T&R sources such products and services from suppliers in various countries, who are risk assessed according to our onboarding, due diligence and monitoring processes.

Supplier Due Diligence

T&R complies with STADA Group's Responsible Procurement Policy when onboarding suppliers, which is completed through EcoVadis. EcoVadis is a leading third-party platform used by STADA Group to evaluate sustainability risk and performance, and support our supplier due diligence

process. All suppliers onboarded through EcoVadis must register with the platform and complete an evaluation questionnaire in which they must agree to comply with our STADA Business Partners Code of Conduct, which includes requirements related to labour conditions, compliance with national laws, modern slavery, human rights, health & safety and regulatory adherence as well as environmental, ethical and responsible procurement principles. STADA Group has been rated as Gold on EcoVadis, which signifies we are in the top 5% of companies assessed by EcoVadis for sustainability performance, indicating our strong commitment to sustainability including environmental, social, ethical and responsible procurement practices.

Suppliers are continuously categorised and risk assessed at T&R. Concerns are addressed through discussions with the respective suppliers to promote awareness and necessary improvements. Continued non-compliance will lead to the termination of our business relationships.

Assessment of Risks and Risk Management

Given the nature of our business model, we believe the principal risks of modern slavery and human trafficking for T&R relate to our supply chain in direct procurement. As such our supplier due diligence processes focus largely on addressing the risks in this area of our business.

Whilst we cannot rule out such risks arising in other parts of our business, we believe the risks present in indirect procurement are lower and similarly mitigated by our supplier due diligence processes as already highlighted in this statement.

Our distribution model predominantly involves direct supply to our customers via T&R or its affiliate entities in other countries within the STADA Group, which reduces the risk in this area. Whilst we do use some distributors, we believe that these present a lower risk for modern slavery and such third parties are risk assessed and vetted in accordance with internal “Know Your Customer” processes, which highlight any general red flags with such parties.

Employees, Training and Whistleblowing

T&R operates a thorough recruitment and onboarding process for new employees which includes right to work checks and vetting processes to ensure candidates have the correct qualifications and right to work visas. T&R adopts a policy whereby we only pay an employee’s salary into a bank account in their name, which is verified at the start of the employment relationship. T&R operates a welcoming and open culture with employee welfare at the centre of everything we do. We have a dedicated Staff Handbook outlining the resources and policies we adopt for employee wellbeing, along with a series of staff benefits including Kyan which is an employee resource providing coaching and counselling and an Employee Assistance programme. T&R was also successful in being named as a Top Employer in 2024, demonstrating the commitment we make to our employee wellbeing.

STADA Group operates a series of mandatory employee training programmes which are undertaken by T&R employees, including Code of Conduct and Conflict of Interest declarations, as well as compliance trainings to ensure that employees are aware of the importance of compliance principles and their duties in the workplace. This training covers various compliance topics, including information on compliance with labour laws and other applicable laws, plus how to report suspected violations. Compliance declarations need to be signed at onboarding and repeated on an annual basis, while training should be completed at onboarding and is also repeated on a biennial cycle as refresher training. T&R also ensures that its senior leaders and

employees in the Procurement department are aware of the risks around modern slavery. T&R makes sure all employees have access to its policies which are available on our internal intranet.

As mentioned under the Policies section of this Statement, STADA Group operates a Whistleblowing Policy which applies to T&R, providing a confidential and anonymous way for concerns or potential breaches of law to be reported to the company by both employees and third parties via an online portal or email account. Again, this demonstrates our commitment to operating a compliant business and providing a suitable forum to concerns to be raised and investigated.

Measuring Effectiveness of our Processes

We recognise the importance of ensuring that our policies and procedures are effective in tackling the risks associated with modern slavery. As such, we regularly review and update our policies, processes and procedures to ensure appropriate safeguards are in place to identify and protect against the risks inherent across our business, including in relation to human rights.

Approval

This statement has been adopted and approved by the Thornton & Ross Limited UK Leadership team (SEC) and its statutory directors.



Signed: Nigel Stephenson

Position: General Manager and Director

Date: 4 June 2025

THORNTON & ROSS LIMITED