

MODERN SLAVERY STATEMENT 2025

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 2025 to 31 December 2025. 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.

Thornton & Ross: 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 healthcare and home hygiene products within the following three areas: (i) Consumer Healthcare (including over-the-counter (OTC) medicines, dermatological treatments and home hygiene products), (ii) Generic medicines and (iii) Speciality medicines (including various innovative and biosimilar medicines).

Established in 1922, Thornton & Ross 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.

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 Office in Slaithwaite and our manufacturing facility in Linthwaite.

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.

T&R promotes an open and ethical culture, adopting four core Values: Agility, Entrepreneurship, One STADA and Integrity.

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.

This statement sets out updates made in our organisation and supply chain to demonstrate our ongoing commitment.

Our Policies

As part of our commitment to combat modern slavery and human trafficking at T&R, T&R and Stada Group have implemented a number of policies and codes of practice that apply to all employees, workers, contractors, agents and subsidiaries acting for T&R within the UK and overseas, as well as policies and codes of practice directed at partners and suppliers:

- T&R Human Rights Policy: this policy outlines our commitments to ethical working practices, human rights and compliance with labour rights and laws. This policy refers to and is linked to international standards, such as the UN Guiding Business and Principles of Human Rights and International Labor Organisation Standards.
- STADA Group Code of Conduct for Employees: T&R employees are bound to comply with this Code. This outlines values and principles which employees must adhere to in carrying out their roles in a legal and ethical way, including labour law considerations, as well as dealing with suspected violations.
- STADA Responsible Procurement Policy: this applies to T&R and sets out the requirements that govern our procurement of goods and services to ensure responsible and ethical sourcing. Through its focus on environmental, social and governance (ESG) risk management in our extended operations, this policy supports the identification and mitigation of labour and human rights risks, including risks associated with modern slavery, in our supply chain.
- Stada Business Partners Code of Conduct: as part of our procurement processes, all potential suppliers must first accept the STADA Business Partners Code of Conduct in order to be added to our approved supplier list. The Code of Conduct includes requirements on Ethics, Labour and Human Rights, and Health and Safety, which together contribute to addressing severe labour-related risks in our supply base. This code is based on, amongst others, the UN Guiding Business and Principles of Human Rights and International Labor Organisation Standards the Declaration of Fundamental Principles and Rights at Work.
- STADA Group Whistleblowing Policy: this 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. The Compliance Portal is an online reporting tool where matters can be reported in a confidential and anonymous way and can be found at www.compliance-reporting-portal.stada.com. 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. We also take efforts to ensure our employees and our suppliers are aware of and can access our policies and codes: internal policies and codes are available on our intranet and shared through onboarding procedures and external codes and policies are shared with partners and suppliers as part of our tender processes and/or integrated into our contractual arrangements. In the next year, we will conduct a review all relevant T&R policies as part of a compliance review process.

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. We recognise that certain categories of workers within our extended operations may be more vulnerable to labour exploitation, including agency workers, temporary labour, warehouse operatives, cleaning staff and other contracted service workers. We are committed to ensuring that appropriate safeguards are in place in relation to these groups through our Business Partnering Code of Conduct and due diligence processes.

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. We recognise that the risk of modern slavery is heightened in certain parts of our operations and supply chain. In particular, we consider higher risk areas to include: (i)sourcing of raw materials, including active pharmaceutical ingredients (APIs), from higher-risk geographies; (ii)contract manufacturing arrangements where we do not directly control labour practices; and (iii)labour-intensive service activities such as warehousing, logistics, freight forwarding, cleaning and facilities management. These areas are prioritised within our risk assessment and due diligence processes.

Supplier Due Diligence

T&R complies with the STADA Group Responsible Procurement Policy and Third-Party Due Diligence process when onboarding suppliers. Our onboarding process ensures that all prospective suppliers receive and formally accept the STADA Business Partner Code of Conduct (or must demonstrate that their own standards are at least equivalent, which we assess by undertaking a cross-functional (including legal and compliance) review to determine equivalence. Suppliers also undergo risk-based ESG and Third-Party Due Diligence screening.

The Business Partner Code of Conduct sets out requirements on labour conditions, compliance with national laws, modern slavery and human rights, health and safety, regulatory adherence, as well as environmental, ethical and responsible procurement principles. Our contractual arrangements with suppliers include obligations to comply with applicable labour and human rights standards through adherence to our Business Partner

Code of Conduct, rights to request evidence or conduct audits as applicable, and the ability to take appropriate action, including termination, in the event of non-compliance.

For ESG risk assessment, STADA Group uses EcoVadis, a leading third-party platform for evaluating the ESG performance and sustainability risks of our suppliers (where applicable). STADA's ESG risk management process follows a two-step, risk-based approach. First, we conduct an abstract ESG risk assessment of our supplier base using EcoVadis IQ, drawing on factors such as sanctions, adverse media, and high-risk geographies or sectors to identify and prioritise higher-risk suppliers and categories of spend. For these prioritised suppliers, we then perform concrete risk assessments and enhanced due diligence using the EcoVadis ratings platform, targeted questionnaires, certifications, audits, or third-party checks. Higher-risk suppliers may be required to provide additional documentation, agree to corrective action plans, or undergo reassessment.

At T&R, suppliers are continuously categorised and risk assessed.

In addition to the above, in 2025, T&R conducted six supplier quality audits under the supervision of our Quality Assurance team, along with eight independent audits performed by third-party auditors. Our STADA Global Audit Team carried out fifty-five 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. Whilst these were Quality-led audits, on-site audits provide an important opportunity for supplier factory conditions to be observed and potential issues or other red flags to be identified.

We recognise the importance of specifically assessing labour and human rights risks and we assess this through EcoVadis assessments. 93% of direct material suppliers contributing to 95% of spend are already assessed for labour and human rights on EcoVadis.

Identified concerns are addressed through dialogue with the relevant suppliers to promote awareness and drive necessary improvements. Where issues persist and non-compliance continues, business relationships may ultimately be suspended or terminated. We are committed to aligning this approach with internationally recognised standards, including the UN Guiding Principles on Business and Human Rights, and to further strengthening our remediation processes.

T&R Rating

T&R participates in an annual SEDEX SMETA audit which assesses its compliance with ethical standards including labour, health & safety and environmental performance. In June 2025, we completed a SEDEX SMETA audit at our Linthwaite manufacturing site conducted by Verisio, demonstrating our commitment to ethical practices and accountability.

STADA Group has been rated as Gold on EcoVadis, placing it within the top 5% of companies assessed for sustainability performance. This rating applies at Group level; T&R aligns its practices with the Group's ESG framework and contributes to these overall performance outcomes.

Assessment of Risks and Risk Management

We apply a risk-based approach to prioritise suppliers for ESG risk assessment, with a focus on areas where modern slavery and human trafficking risks are most likely to arise. Our abstract risk assessment refers to an initial, data-driven screening of suppliers using a combination of internal and external indicators, including country risk indices, sector-specific risk data, sanctions screening and adverse media. This enables us to identify suppliers and categories of spend that may present heightened ESG risks, including modern slavery.

In direct procurement, we conduct an abstract risk assessment for all direct suppliers. Based on this, we prioritise the detailed ESG assessments for high-risk suppliers.

In indirect procurement, we conduct an abstract risk assessment for all critical and recurring indirect categories and suppliers. Based on this, we prioritise the detailed ESG assessments for high-risk suppliers

While financial thresholds are used as a practical means of prioritisation, supplier risk assessments are not solely driven by spend. We take into account inherent risk factors such as geography, sector, labour intensity and nature of services provided. Where these indicators suggest elevated risk, suppliers may be prioritised for enhanced due diligence irrespective of spend level.

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 a confidential employee resource which provides amongst others, coaching and counselling and an Employee Assistance programme. We are proud to have been awarded a Top Employer in 2025 and as well as an accredited Living Wage Employer, both demonstrating the commitment T&R makes to its employee wellbeing.

STADA Group operates a series of mandatory employee training programmes which are undertaken by T&R employees, contractors and workers 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. We will continue to develop targeted training and awareness initiatives relating specifically to modern slavery risks,

particularly for employees operating in higher-risk functions such as procurement, supply chain and site operations.

In certain circumstances, our partners and suppliers must undertake mandatory T&R training programmes to carry out business with us. This may include, but is not limited, to codes or policies referred to in this Statement.

Measuring Effectiveness of our Processes and KPIs

We are undertaking a review of our governance framework to ensure that the effectiveness of our modern slavery risk management processes is subject to appropriate oversight, challenge and continuous improvement.

We use key performance indicators (KPIs) to measure how effective our progress towards our goals have been. These KPIs include, but are not limited to:

Supply Chain:

- i. the proportion of suppliers subject to ESG and modern slavery risk assessment;
- ii. the number and proportion of higher-risk suppliers subject to enhanced due diligence or audit;
- iii. the number of suppliers subject to corrective action plans and the status of those actions;
- iv. tracking improvements in supplier ESG performance; and
- v. the number and nature of concerns raised through whistleblowing channels relating to labour and human rights.

Internal:

- vi. completion rates for relevant compliance and training programmes; and
- vii. the number and nature of concerns raised through whistleblowing channels relating to labour and human rights.

In 2025, we conducted ESG risk assessments of 229 suppliers, covering more than 95% of our direct spend and over 90% of our prioritised indirect spend. Of these, only ten suppliers were identified as having weak performance in the Labour and Human Rights area, and together they accounted for less than 1% of our total spend.

Deeper risk management reviews with these suppliers were undertaken and no instances of modern slavery were identified through our existing due diligence processes.

Further actions

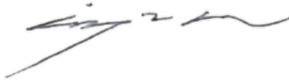
Following our review of our actions this financial year to prevent modern slavery and human trafficking from occurring in our business or supply chains, we intend to take the following further steps:

1. strengthen our governance framework through the formal establishment of a dedicated modern slavery compliance committee, comprising representatives from HR, Legal & Compliance, Procurement, Finance and other relevant business functions, which will meet regularly to oversee risk management, monitor KPIs and review progress;

2. enhance our supply chain due diligence processes, including increasing the proportion of suppliers subject to detailed ESG and labour risk assessment;
3. further develop our remediation and escalation framework, including formalising standards for supplier engagement and follow-up;
4. strengthen internal reporting through the introduction of structured KPI monitoring and governance oversight; and
5. continue to embed cross-functional collaboration to ensure modern slavery risks are effectively identified, managed and reflected in our disclosures.

Approval

This statement has been adopted and approved by the directors of Thornton & Ross Limited.



Signed:

Position: Craig Shaw, General Manager and Director

Date: 30 June 2026

THORNTON & ROSS LIMITED