

The background of the entire page is a photograph of a woman with long, curly hair, seen in profile from the side. She is standing on a wooden boardwalk or pier, wearing a light-colored long-sleeved shirt and dark leggings. She is on a skateboard. The scene is set at sunset, with the sun low on the horizon, creating a strong orange and yellow glow. The sun is positioned directly behind her, creating a silhouette effect and a lens flare. A metal railing with vertical bars runs across the middle ground. The foreground is the wooden planks of the boardwalk. A large green curved shape is overlaid on the right and bottom-left sides of the image.

# Modern Slavery Statement

for Norton Healthcare Limited

# Modern Slavery Statement

## Introduction

This is the modern slavery and human trafficking statement of companies in the Teva UK group ("Teva") for the financial year ending 31 December 2018<sup>i</sup>. It is made in accordance with Section 54(1) of the Modern Slavery Act 2015. The steps outlined in this statement are applicable to the companies adopting this statement.

## Who are we?

Teva is committed to increasing access to high-quality healthcare for people across the globe (including the UK), at every stage of life. We do this by developing, producing and marketing affordable generic drugs as well as innovative and specialty pharmaceuticals and active pharmaceutical ingredients. We have a global portfolio of 35,000 products and we are active in 60 countries, employing in the region of 43,000 people around the world.

## Ethical values and position on human rights

As outlined in Teva's group position on Human Rights found [here](#), the Teva UK group, including all its directors, executives and employees is committed to respecting internationally recognized human rights. We support the spirit and provisions of the Universal Declaration of Human Rights and the subsequent guidance set forth in the United Nations Guiding Principles on Business and Human Rights.

As a signatory of the United Nations Global Compact since 2010, we have formally and publicly confirmed our resolve to take all measures that are reasonably possible within our business and throughout our supply chain to respect all individuals and uphold their human rights, while ensuring we are not, even unwittingly, complicit with Human Rights violations in our extensive global supply chain. We believe compliance with all applicable laws, regulations and other requirements designed to protect human rights is fundamental to our corporate well-being and that by striving for excellence in this area, we also protect, enhance and create value for our organization.

As part of our commitment to preventing acts of slavery and human trafficking from occurring within both our business and our supply chain and conducting our

business with honesty and integrity, we expect the same high ethical standards from our suppliers. Our responsibility in this area includes creating awareness and understanding of human rights and employment practices. We incorporated these principles into our Code of Conduct found [here](#), strategies, policies and procedures, and by continuing to live out our values, we will uphold our basic responsibilities to our people and our environment. We review our policies and practices on an ongoing basis to ensure we continue to meet and uphold these ethical standards. We educate, inform and engage in dialogue with employees and vendors to ensure all those covered by this position are aware of our expectations and their responsibilities. We acknowledge the International Labor Organization's Declaration on Fundamental Principles and Rights at Work as a guiding reference for our policies and approach to human rights.

We continue in our commitment to support and respect the protection of internationally proclaimed human rights. We uphold the elimination of all forms of forced and compulsory labour, and the effective abolition of child labour. Ensuring that we maintain the highest moral and ethical standards regarding labour practices remains a priority at Teva.

## Teva policies and codes

Since 2010, Teva has also participated in the United Nations Global Compact (UNGC). The UNGC is a strategic policy initiative of the United Nations which encourages companies around the world to adhere to 10 principles of responsible business relating to human rights, labour standards, environmental protection and anti-corruption. These principles include, amongst others, the elimination of all forms of forced and compulsory labour, the effective abolition of child labour, the elimination of discrimination in respect of employment and occupation and the principle of upholding freedom of association and effective recognition of the right to collective bargaining.

As part of our commitment to combating modern slavery, we implemented the formal communication of our Responsible Supply Chain policy which sets out our expectations for all our suppliers to comply with the UN Global Compact Principles. Suppliers are obliged to consider these responsibilities as part of selection and continued engagement with Teva.

Our Supplier Code of Conduct is made publicly available to suppliers on our website, and formal acceptance of this policy by suppliers is a pre-requisite to contracting

<sup>i</sup> TEVA UK Limited and Norton Healthcare Limited are obliged to report under s.54 of the Modern Slavery Act 2015. Certain other companies in the TEVA group have adopted this statement either because they are obliged under the Act or on a voluntary basis, namely: IVAX UK Limited and Teva Pharma Holdings Limited. Those companies do not have websites and a copy of their adopting statement is held at the TEVA office and is available on request.

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and tendering with Teva. The PSCI Principles, which are aligned with our Supplier Code of Conduct, are aligned with the UN Global Compact Principles.

## Supply chain and contractual obligations

Teva manufactures finished products itself but also purchases goods and services, including raw material, from third party suppliers. As part of our processes to ensure ethical practices within our supply chain, we became a member of the Pharmaceutical Supply Chain Initiative ("PSCI") in 2016, which includes 21 of the largest and leading pharmaceutical and healthcare companies. As set out in its 2018 Annual Report, PSCI's vision and purpose is to bring together its members to champion responsible supply chain practices and to establish and promote behaviours that will continuously improve ethics, labour, health, safety and environmentally sustainable outcomes for supply chains. PSCI's priority areas encapsulate fair and safe work places and include areas such as, worker protection, fair treatment of employees and freely chosen employment. Teva continues to be a member of PSCI and the principles that govern supply chains in this sector continue to apply and inform our ethical labour practices. These principles continue to form part of our Supplier Code of Conduct.

Our suppliers are bound by stringent contractual obligations which require them to support our objectives including requirements to:

- ensure their awareness of the terms of our Supplier Code of Conduct;
- answer reasonable queries in respect of compliance with our Supplier Code of Conduct;
- allow reasonable audits to assess compliance with our Supplier Code of Conduct; and
- acknowledge Teva's right to terminate any contract for failure to comply with our Supplier Code of Conduct.

## Supplier risk assessment/audit

Under Teva policy, Teva utilised a risk-based assessment of suppliers considering, amongst other things, their potential risk of non-compliance to the Supplier Code of Conduct. We acknowledge we must be particularly vigilant when sourcing in specific industry sectors with geographically distant supply chains. Suppliers prioritised as high or medium risk are further assessed for compliance with the Supplier Code of Conduct and may thereafter be subject to an audit.

Teva has worked with an external sustainability specialist and utilised its 'Supplier Sustainability Ratings' solution to undertake initial assessments of our suppliers' compliance with our Suppliers Code of Conduct.

As part of our commitment to our ongoing compliance with the Act, we have utilised our risk assessments to enhance ways of working in respect of third party compliance with our Supplier Code of Conduct.

## Employees, training and whistleblowing

Employee relations are managed across Teva by the Human Resources Department. Employee working hours are set out in a contract and any requirement to work additional hours outside of the standard contractual hours must be approved in advance by the relevant managers with the employee's consent. All relevant UK employees are paid at least the UK National Living Wage.

We invest in educating our staff to recognise risks of breaches of our Code of Conduct or applicable laws in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches.

Suppliers, workers and service providers continue to be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment - this includes concerns relating to ethical behaviour. Teva personnel should also promptly report any violations of Teva's Code of Conduct, the Supplier Code of Conduct or any policies or laws, to Teva's Office of Business Integrity (OBI) through a dedicated telephone hotline.

## Approval

This statement was approved by the board of directors of Norton Healthcare Limited on 11 June 2019.



Director of Norton Healthcare Limited

June 2019