

Modern Slavery Statement

Teva UK 2025



This is the modern slavery and human trafficking statement of companies in the Teva UK group (“**Teva**”), part of the Teva global group of companies, for the financial year ended 31 December 2024¹. It is made in accordance with Section 54(1) of the Modern Slavery Act 2015 (the “**Act**”). It sets out the steps we have taken to ensure there is no modern slavery or human trafficking within our business and supply chains. 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 medicines for people across the globe (including the UK), at every stage of life, and aims to improve health outcomes for patients, their families and communities worldwide. We do this by developing, manufacturing and marketing affordable generic medicines as well as innovative and specialty pharmaceuticals and active pharmaceutical ingredients. We provide quality innovative, generics and biosimilar medicines to millions of people each day in 57 markets around the world. We have more than 1,900 products in our global portfolio and a pipeline comprising generic, innovative and biosimilar medicines. Our portfolio of generic medicines covers 58% of treatments on the World Health Organization’s Essential Medicines List of important drugs

that address key healthcare needs across the globe. We have a global workforce of over 37,000 people (including contractors) around the world and 1,086 people worked for Teva in the UK² as at 31 December 2024.

Ethical values and position on human rights

Teva is committed to acting responsibly, maintaining integrity and ensuring transparency in every aspect of our business. This includes maintaining a culture of ethics and compliance and ensuring our approach is embedded throughout our supply chain. The [International Labour Organization’s Declaration on Fundamental Principles and Rights at Work](#) guides our approach, as highlighted in our [Position on Human Rights](#).

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¹Teva 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: Teva UK Holdings Limited and Teva Pharma Holdings Limited. Those companies do not have websites and a copy of their adopting statement is held at the Teva registered office and is available on request.

²The United Kingdom had 1,086 active employees in 2024 (excluding those on personal leave, such as maternity leave or sick leave). See p41 of *Teva 2024 Healthy Future Report | Disclosures*



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. 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 organisation. This is consistent with our purpose, values and Code of Conduct. 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 an awareness and understanding of human rights and employment practices and principles. These principles are also incorporated into our [Code of Conduct](#), strategies, policies and procedures, and by continuing to live our values, we will uphold our responsibilities to our people and our environment. Our Code of Conduct brings our Mission & Values to life, setting clear

expectations for our behaviour. It describes areas in which acting in accordance with our values is particularly important and specifically refers to the following actions Teva can take in the workplace to ensure compliance with ethical labour practices:

- Being aware of countries, regions, sectors, economic activities where there is a greater likelihood of human rights or labour abuses, and responding accordingly with policies and procedures;
- Using adequate and verifiable mechanisms for age verification in recruitment procedures;
- Developing and implementing mechanisms to detect labour violations; and
- Working in partnership with other companies, associations and employers' organisations to develop an industry-wide approach to address human rights issues.

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 suppliers to ensure awareness of our expectations and their responsibilities.

At least annually, we perform a human rights risk assessment, ensuring that the list of suppliers and our own sites are updated in

the assessment platform. Our human rights risk assessment evaluates the risk exposure of our operations and suppliers. The assessment leverages a realtime online artificial intelligence system that covers risks for more than 170 geographies and 350 products and services relating to 38 sustainability topics (including human rights and environmental issues). In 2024, more than 5,000 of our supplier sites and more than 100 of Teva's locations were screened and rated according to their risk exposure level (low, medium, high and extreme) for the various human rights and environmental topics. The analysis also classified suppliers according to Teva's influence rating (low, medium and high), which considers business relevance (volume of business) and list of significant suppliers. Teva's operations are classified as extreme influence rating. Risk and influence ratings are plotted on a matrix to help determine the suppliers and operations where further due diligence action may be warranted. Key management implications and recommendations are outlined for each segment of the matrix. The assessment matrix can also be integrated into other assessment results, such as a self-assessment (EcoVadis score) and third-party audits (Principles of the Supply Chain Initiative – PSCI).

We embed sustainability criteria into sourcing and contracting processes by:

- Communicating Teva's Supplier Code of Conduct (SCOC);
- Assessing supplier sustainability maturity through internal risk and ESG questionnaires; and
- Conducting sustainable due diligence activities; for example, desktop sustainability assessments performed by EcoVadis; human rights and environment screenings conducted with EiQ; and on-site EHS/CSR audits in line with PSCI audit protocols.

All suppliers participating in Request for Proposals (RFPs) through our Global Procurement sourcing platform are required to disclose information on their sustainability maturity, so we can evaluate their sustainability performance, greenhouse gas (GHG) emissions and compliance with the AMRIA Common Antibiotic Manufacturing Framework. All third-party representative suppliers undergo sanctions screenings, covering topics such as bribery, corruption and forced labour violations. Our Human Rights and Environmental risk screening tool covers over 5,583 Teva supplier sites, which encompass all our significant suppliers.

Teva policies and codes

Since 2010, Teva has 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 ten 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. Teva's global [2024 Healthy Future Report](#) fulfils our commitment to submitting an annual communication on progress to the United Nations Global Compact and reaffirms our commitment to embedding its principles across our business.

As part of our commitment to combating modern slavery, we implemented a formal communication of our [Position on Responsible Supply Chain](#) which sets out our expectations for all our suppliers to uphold both industry and international standards of ethics, labour practices, human rights and environmental protection, as well as the health and safety of patients, employees and the global

community. Teva expects suppliers to uphold the same standards as part of their selection for their own suppliers. Suppliers are also directed to Teva's Office of Business Integrity, which addresses concerns or allegations of misconduct, including violations of Teva's Code of Conduct, values, policies and laws.

Our SCOC is publicly available to suppliers on our [website](#) and formal acceptance of it by suppliers is a part of the process of contracting and tendering with Teva. Suppliers who were not willing to accept our SCOC have been excluded from Teva's sourcing processes. On occasion, Teva has accepted contracts with suppliers who have shown that they have in place their own code, of substantially similar nature. Our SCOC also requires our suppliers to comply with the PSCI of which Teva has been a member since 2016.

Supply chain and contractual obligations

Teva's supply chain is an extension of our company, helping us reach millions of patients around the globe each day. We operate one of the largest global fully-integrated manufacturing and delivery networks in the pharmaceutical industry, with hundreds of contract manufacturing operations globally that support development, manufacturing and packaging.

In our supplier Letter of Intent, we outline our supplier expectations, our approach to a responsible supply chain, and our ongoing dedication to ethical practices and environmental stewardship. It includes emerging International Human Rights and Environmental Regulations requirements. We updated our supplier Letter of Intent in 2024 to ensure comprehensive compliance with human rights regulations and our new SCOC, which we updated following PSCI principles updates.

Our new SCOC:

- Establishes Governance and Management Systems as the first Principle, reflecting its foundational nature and impact on the four sections (ethics, human rights, health & safety and environment);
- Broadens the scope of the human rights section to cover the rights of local communities and a commitment to conduct regular human rights risk assessments;
- Includes new clauses on establishing a culture of responsible practices, providing remediation, setting up grievance mechanisms, protecting products and quality, upholding the right to collective bargaining, supporting the well-being of workers and conserving biodiversity; and
- Strengthens clauses on resource efficiency and climate change (covering suppliers' scope 3 GHG emissions).

Through regular supplier initiatives and activities we reinforce the sustainability behaviours we expect of our suppliers and to help them better align with our Healthy Future strategy. At our annual Sustainability Webinar for suppliers in 2024, co-hosted with EcoVadis, we welcomed over 300 attendees. The webinar explained updates to our SCOC and sustainability commitments that we expect from our suppliers.

We regularly provide sustainability training for our procurement leaders to equip them to engage with suppliers and drive our sustainability progress. In April 2024 the Sustainable Procurement team delivered internal capability training for Global Procurement as part of its "Sustainability Learning Day", which included:

- Updates on our Healthy Future strategy and Global Procurement targets;
- Reiterating supplier calls to action; and
- A focus on human rights regulations.

Supplier risk assessment/audit

Under Teva policy, and in compliance with the Act, Teva utilises a risk-based assessment of its suppliers considering, amongst other things, their potential risk of non-compliance to the SCOC and their importance for Teva. We acknowledge that we must be particularly

vigilant when sourcing in specific industry sectors with geographically distant supply chains. All suppliers who achieve EcoVadis ratings under 50 points automatically receive a request on Teva's behalf for improvement through the implementation of corrective actions for high- and medium-risk areas identified.

In 2017, we established a risk assessment framework using the EcoVadis platform, the leading provider of sustainability risk and performance ratings for global supply chains, and tracked medium and high-risk suppliers' corrective actions. In 2024, globally Teva received a score in the sustainable procurement area of 87 (out of 100), which ranks Teva in the top 1% of our sector.

Teva engages with, and maintains oversight of suppliers through questionnaires, surveys, PSCI audits and sustainability assessments conducted by third-party sustainability rating companies (e.g. EcoVadis). We continue to work towards our target to expand our sustainability assessments to 95% of significant suppliers by 2030. In 2024, 935 (42%) of significant suppliers had valid assessments. We have also targeted 70% of significant suppliers to have scored at least 60 points in EcoVadis by 2030. To-date, 616 (27%) of significant suppliers have achieved this.

In addition, in partnership with EcoVadis, Teva, together with other leading companies in the pharmaceutical industry, is part of the

Responsible Health Initiative (RHI). This initiative is intended to increase shared value across the industry's supply chain by enabling key players in the global health sector to boost not only their own sustainability performance, but also that of the industry's collective suppliers.

More detail and progress against those targets as at 31 December 2024, can be found in the 2024 Healthy Future Report³.

Employees, training and whistleblowing

We are committed to promoting a healthy work-life balance and well-being. We comply with applicable regulations governing hours of work and rest in every country in which we operate. This includes, when reasonably practical, respecting weekends and national or religious holidays and regular working hours compliant with local laws. We compensate our employees fairly based on market norms and in line with legal requirements for wages and social benefits, often exceeding legal minimum levels. We aim for pay equity at all levels. All UK employees are paid above the UK National Minimum Wage. Teva supports family-friendly working patterns and employees can apply for flexible working if required. Employees are further supported by a comprehensive

wellbeing programme, which includes quarterly focused wellbeing events and the availability of mental health first aiders.

We invest in educating our employees to recognise risks of breaches of our Code of Conduct or applicable laws in our business and supply chains. Through our regular training programmes, employees are encouraged to identify and report any potential breaches. Our employees are made aware through our comprehensive training programmes that compliance with laws, regulations and policies is non-negotiable and integral to our vision of the right way to operate our company.

In 2024, over 99% of Teva's new hires in the UK completed the Code of Conduct training, instilling the importance of ethics and compliance from the start. Teva also conducts refresher training for all existing employees on the Code of Conduct every two years. Over 99% of employees were recertified in 2024; the next refresher training is due in 2026.

The "Our Way" Training Programme, launched in 2017, is an employee training series featuring many virtual compliance courses. Our Way reinforces our compliance principles and commitment to integrity. In 2024, the training programme covered a number of key ethical behavioural topics including Third Party Due Diligence and Data Privacy. These were rolled

out between three separate training campaigns throughout the year and were completed by over 99% of the active employees to whom they were assigned in the UK.

Suppliers, employees 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.

Approval

This statement was approved by the board of directors of Teva UK Limited on 18 June 2025.

Kim Innes

Director of Teva UK Limited
18 June 2025

³Please refer to p.60 of the 2024 Healthy Future Report.