# Modern Slavery Act Statement

**INTRODUCTION**

As part of our vision to be a world class global provider of veterinary pharmaceuticals, enhancing the health of farm & companion animals, **Norbrook** is committed to following all applicable laws and regulations and to improving our practices to combat slavery and human trafficking.

**OUR BUSINESS, STRUCTURE & SUPPLY CHAIN**

Norbrook is a manufacturer and distributor of products in the global veterinary pharmaceutical sector.

We carry on business in a number of countries and in our last financial year ending 29th July 2022, had a global annual turnover of £232M.

Our ultimate parent company is Norbrook Holdings Limited, which is incorporated in England and Wales and has a head office at; 1 Saxon Way East, Corby, Northamptonshire, NN18 9EX. Norbrook Holdings Limited comprises of a number of trading companies:

Norbrook Laboratories Limited
Norbrook Laboratories Australia (Pty) Limited
Norbrook Laboratories (G.B.) Limited
Norbrook Laboratories (Ireland) Limited
Norbrook, Inc.
Norbrook Kenya Limited
Norbrook Manufacturing Limited
Norbrook New Zealand Limited
Norbrook (Uganda) Limited
Norbrook do Brasil Ltda.

From a supply chain perspective, we procure both 'Goods' and 'Services' from third party suppliers. From a 'Goods' perspective, examples of these are raw materials, pharmaceutical manufacturing equipment, components, active pharmaceutical ingredients, excipients and packaging. From a 'Services' perspective, these are from commercial service providers and other professional services as are required to support the effective operation of our business. We also procure the goods and services that are required to operate our manufacturing sites, for example; energy, maintenance, and operating supplies.

**OUR ETHOS**

We consciously work to conduct our business with integrity and in an ethical and sustainable manner. An example of this commitment is the implementation of a number of policies which seek to enforce effective systems and controls to ensure unwanted practices are not taking place anywhere in our business. Our policies also work to ensure that there is no slavery or human trafficking in any part of our business, and include the following:-

1. Code of Conduct
2. Anti-Bribery Policy; and
3. Anti-Slavery and Human Trafficking

**ESTABLISHED SUPPLIER APPROVAL PROCESS**

To the extent that is reasonably possible and to ensure those in our supply chains comply with our quality requirements and our core company values; we adopt a risk based approach to supplier selection, and seek to identify and mitigate potential risk in engaging suppliers by requiring them to complete a questionnaire process prior to Norbrook doing business with them.

Where appropriate, we build long term relationships and take a partnering approach with our suppliers endeavouring to; embed our commitment to doing business with those who share our vision on transparency, remedy shortcomings and continue improvement in the area of responsible sourcing and labour rights.

Where possible, we also enter into a formal supply contract.

**ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY & SUPPLIER DUE DILIGENCE**

Since the introduction of the Modern Slavery Act 2015 ('the Act') we have now created an Anti-Slavery and Human Trafficking policy to draw our staff's attention to the Act and to inform them how to report any relevant concerns. We have also embarked on a supply chain compliance programme which we have added to the established supplier approval process, in order to specifically mitigate the risk of slavery and human trafficking occurring in our supply chains and to ensure our partners share our vision in line with international standards[1].

The Anti-Slavery and Human Trafficking policy and supply chain compliance programme involves input from the Quality, Procurement, Human Resources and Legal Departments, and consists of the following steps:-

1. Questionnaire: at supplier approval stage and in conjunction with the established supplier approval process, a supplier is required to provide information demonstrating its own proactive policies on slavery, human rights and workplace conditions; and insofar as is reasonably possible, demonstrate its compliance with the requirements of the Modern Slavery Act 2015;

2. Contracts: all future commercial contracts for the supply of goods or services to Norbrook will, where relevant and possible, reference the relevant Norbrook policies and also include appropriate clauses and undertakings regarding supplier compliance with such policies and/or all applicable laws, including the Modern Slavery Act; and

3. Audits: on site audits for those suppliers deemed to be in the medium to high risk categories.

These actions reflect our commitment to taking the right steps to ensure that there is no slavery or human trafficking in our supply chain or in any part of our business and collectively, we consider the above steps will prove effective. We endeavour to lead by example, we will continue to internally evaluate our own response as well as review the response of our suppliers in our efforts to manage and minimise supply chain risk.

**RESPONSIBILITIES & TRAINING**

All Directors and Executive Leadership Team members have been briefed on the Act, its application, the risks within supply chains and the indicators of Modern Slavery and labour exploitation.

Also, to ensure a high level of understanding of the risks of slavery and human trafficking in our supply chains and our business, we have allocated responsibility as follows:-

1. Legal Director: ensure all the relevant Norbrook policies are compliant with UK legislation and are reviewed at least once every two years;
2. HR Director: ensure all the relevant Norbrook policies are readily available to all staff, whether on the intranet or in hardcopy, and that all staff are appropriately trained – either upon introduction of the policy or commencement of employment (whichever is the earliest), with refresher training being provided at least once every two years;
3. Supply Chain Director: ensure all the relevant Norbrook policies are applied to the supplier/vendor approval process, conduct appropriate risk assessment scoring and investigate any concerns that might be identified; and
4. Quality Director: ensure satisfactory performance of audits and provision of appropriate and accurate reports internally.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Norbrook's slavery and human trafficking statement for the financial year ending 29th July 2022. It was approved by the Board of Directors on 26th January 2023.

Liam Nagle
Director and CEO
Date: 14th February 2023

[1] UN Guiding Principles on Business and Human Rights