



## **MODERN SLAVERY STATEMENT**

**December 2024**

### **INTRODUCTION**

This statement is made in accordance with the Modern Slavery Act 2015 (the **Act**). The statement sets out the action taken by Dechra Topco Limited and its subsidiaries (**Dechra**) to understand and mitigate potential modern slavery risks related to its business and to put into place steps that are aimed at ensuring there is no slavery or human trafficking in Dechra or its supply chain.

### **OUR BUSINESS**

The previous statements were issued in the name of Dechra Pharmaceuticals PLC, however following the acquisition of Dechra Pharmaceuticals PLC in January 2024, the ultimate UK Company is Dechra Topco Limited

Dechra is a global specialist veterinary pharmaceuticals and related products business. Our Purpose is the sustainable improvement of animal health and welfare globally. Our expertise is in the development, manufacture, marketing, and sales of high quality veterinary pharmaceutical products for use by veterinarians worldwide.

We currently have sales and marketing organisations in 27 countries and market our products in 62 other countries worldwide through distributors or marketing partners.

Approximately 50% of Dechra's pharmaceutical products are produced within our own manufacturing sites with the remaining 50% managed through external supply relationships (Contract Manufacturing Organisations (CMO)).

Information on our business and products and a list of our subsidiaries is available at [www.dechra.com](http://www.dechra.com).

Dechra is committed to good corporate citizenship and ethical standards, taking steps to investigate our supply chain and organisation. Ethical behaviour is central to the way we operate and to the success of Dechra. Our **Values** (Dedication, Enjoyment, Courage, Honesty, Relationships and Ambition) encapsulate Dechra's

business ethics and set standards that all employees should strive to achieve. We are committed to sourcing products from suppliers who share these ethical values.

## **OUR SUPPLY CHAIN**

In seeking to identify the modern slavery risks in our supply chain, we consider the potential for our business to cause, contribute to, or be directly linked to modern slavery. Our supply chain includes a broad range of direct suppliers from various locations, including those considered a higher risk for modern slavery by virtue or geography.

Dechra purchases raw materials, for example active pharmaceutical ingredients (API) and excipients, from a range of suppliers across the globe. Approximately 56% of API purchased is from third parties located in China, India and Mexico and 22% of excipients purchased is from third parties located in Brazil and China. In addition, Dechra purchases manufactured goods and services from around the world, including CMOs, of which 16% are based in India, Mexico and Brazil. Each of these countries is deemed a high risk territory.

We aim to conduct our business with and source our products from suppliers who share our Values and who are committed to operating in a responsible and ethical manner towards both their own workers and their own suppliers.

Dechra's supply chain partners are required to comply with Good Manufacturing Practice (GMP) and Good Distribution Practice (GDP) requirements. This GMP and GDP standard of operation is underpinned by inspections undertaken by national regulators.

## **OUR EMPLOYEES**

There are 2,669 employees that work for Dechra in 27 countries.

Approximately 12.4% of our total workforce employees are based in high risk countries of Brazil and Mexico.

There are 293 employees in Brazil, all of whom are Brazilian nationals and their eligibility to work is verified during the recruitment process. The Brazilian equivalent of the National Minimum wage is used when remunerating employees.

There are 440 employees in Mexico, all of whom are Mexican nationals. Prior to employment, the Mexican equivalent of Right to Work checks are carried out. The Mexican equivalent of the National Minimum wage is used when remunerating employees.

As such, we believe the risk of modern slavery in our directly employed workforce is low. Employees are working in controlled environments where there are established policies, processes and local or national legislation that may apply. Employees may also have an obligation to comply with their own regulatory bodies if they have certain qualifications, therefore they will have a higher standard of responsibility both to their own regulator and to the business.

We value the diversity of people, skills and abilities across our business and believe that diversity supports the growth of our business in all territories where we have a presence:

- we recruit and promote people based on their ability, contribution and potential;
- we are committed to promoting, supporting and maintaining a culture of fairness, respect, and equal opportunity for all;
- we are committed to fair employment practices and comply with national legal requirements regarding wages, including minimum wages, overtime hours, mandated benefits and working hours;
- we provide a safe working environment for those who work for us. We reinforce good safety management practices and maintain awareness of safe ways of working;
- we treat people fairly and do not tolerate bullying and harassment. We do not discriminate for reasons such as age, gender, sexual orientation, marital status, race, colour, ethnicity, disability, religion, political affiliation, or union membership;
- we do not use forced, bonded, or indentured labour or involuntary prison labour or take part in human trafficking;
- we do not use child labour. We comply with international standards on the minimum age for employment;
- we prohibit the imposition of any financial burdens on workers in our own operations, or with suppliers and recruitment agencies.

## **OUR POLICIES AND PROCEDURES ON SLAVERY AND HUMAN TRAFFICKING**

We have policies in place that underpin our commitment to combat modern slavery and human trafficking in our supply chain or in any part of our business. Our policies are reviewed and updated regularly. The Dechra Annual Report, the Dechra Code of Conduct, the Dechra Human Rights Policy and the Dechra Values set out the Group's commitment to acting ethically and with integrity towards our employees and in all our business relationships with suppliers.

**Code of Conduct:** Our Code of Conduct includes important internal guidelines for interactions with our customers, suppliers, and one another in line with our Purpose and Values. All colleagues are required to comply with the Code of Conduct.

**Dechra Values:** The Dechra Values are integrated into the Code of Conduct and are central to every decision we make. The Dechra Values summarised below show our business's commitment to ethics and applying set standards, that all employees should strive to achieve:

- Dedication: committed to delivering products and services that meet the highest level of service and quality (Delivering Excellence);
- Enjoyment: creating an environment where our people want to come to work and feel a part of Dechra (Having Enthusiasm for everything we do);
- Courage: allowing challenge, so that innovation and creativity can flourish (Being prepared to leap into the unknown);
- Honesty: we are honest and open in all interactions and act with integrity and fairness (Having integrity and trusting those around you);
- Relationships: customers and suppliers are seen as business partners, thereby we work together for common success (Working together to reach our goals);
- Ambition: goal orientated, delivering results through an energetic and resilient approach (Striving to be the best).

**Human Rights Policy:** The Dechra Human Rights Policy sets out our commitment to conduct business with respect for human rights. It specifically prohibits the use of modern slavery, child labour, forced labour or human trafficking in our business. We base our human rights policy commitment on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

In light of the Directors' responsibility for modern slavery, the Sustainability Committee of Dechra approves the Human Rights Policy on an annual basis, with advice on its responsibilities provided by the central Company Secretarial team.

**How to Raise a Concern Procedure:** The Dechra How to Raise a Concern Procedure encourages employees to raise concerns, including any breaches of Dechra Values, policies, or the laws of the countries in which we operate. The How to Raise a Concern Procedure includes an independent telephone number for those

colleagues that wish to report anonymously can use. There will be no repercussions for an employee raising a concern.

### **THIRD PARTY CONDUCT AND EXPECTATION**

Dechra's Third Party Code of Conduct was launched in 2017. In keeping with Dechra's commitment to act with integrity in all its business dealings, Dechra's Third Party Code of Conduct includes a responsibility to upholding and respecting human rights both within our business and in that of our third parties, setting out our position on modern slavery, child labour, non discrimination, fair treatment, wages, benefits and working hours.

Third parties are expected to adhere to the principles contained in Dechra's Third Party Code of Conduct. Failure to comply may result in the termination of a business relationship.

If a Supplier has their own equivalent code of conduct, it will be reviewed by Dechra to ensure that it is aligned with Dechra's position.

Dechra's Third Party Code of Conduct expects suppliers to:

- not use forced, bonded, or indentured labour or involuntary prison labour or take part in human trafficking;
- not use child labour and to comply with international standards on the minimum age for employment;
- not place any financial burdens on workers within their own operations and verify that any employment or recruitment agencies engaged do not do so either;
- not place any unreasonable restrictions on a worker's freedom of movement, and ensure workers are not required to pay for the opportunity to do the job;
- use workers who have freely chosen to work with them and who are free to leave their employment at any time;
- provide a safe and healthy working environment;
- pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. In addition, they shall have working hours that comply with national laws;
- provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, and no threat or any such treatment;
- respect the rights of workers to associate freely with, join or not join labour unions, workers' councils or seek representation; and
- engage in open and direct communication with workers to resolve workplace and compensation issues, without threat of reprisal.

## **DUE DILIGENCE, RISK ASSESSMENT AND RISK MITIGATION,**

Dechra has processes in place to assess whether activities or countries where it operates represent a risk in relation to modern slavery or human trafficking:

- we have a supply chain risk assessment process in place within Dechra. We have a de minimis threshold above which all third parties are assessed for modern slavery risks. In addition, any identified high risk suppliers, identified using key information such as supplier type, supplier services/products, product spend and geographical location, are subject to further due diligence and asked to complete a Modern Slavery questionnaire and confirm that they will adhere to the Dechra Third Party Code of Conduct, or their own equivalent Code. This is refreshed for high risk third parties annually using our Third Party Risk Management Platform.
- any organisation identified as medium or high risk is screened and monitored on a 24/7 via the Third Party Risk Management Platform's 'Vendor Threat Monitoring' which searches for adverse media reports from news sources worldwide and enforcement profiles collected from a number of enforcement sources globally. The monitoring flags any historical risks and any new issues or concerns linking a third party to illegal labour practices. No issues have been identified by our screening software;
- Dechra seeks to include its standard "compliance with laws" clauses in its commercial contracts with third party suppliers. Such clauses require that:
  - suppliers adhere to Dechra's Third Party Code of Conduct and comply with all applicable laws relevant to the performance of the service envisaged under the contract; or
  - they have their own suitable equivalent Code of Conduct (which we review to check that their Code is sufficient).

If any issues are identified regarding the third party's conduct, Dechra will take any action that may be required, which may include exiting relationships with a supplier.

## MEASURING EFFECTIVENESS

In order to maintain the highest standards of conduct and ethical behaviour, the following key performance indicators are routinely monitored:

KPI Description	Previous Year	This Year
Internal Processes		
<ul style="list-style-type: none"> <li>Code of Conduct training</li> </ul>	97%	97.7%
<ul style="list-style-type: none"> <li>Right to Work or equivalent checks of employees, where required locally</li> </ul>	100%	100%
Third Party Risk Management Platform:		
<ul style="list-style-type: none"> <li>Number of Modern Slavery questionnaires sent to Third Parties</li> </ul>	N/A	144

In order to maintain the highest standards of employee conduct and ethical behaviour Dechra requires all employees to complete the Code of Conduct online training module annually, with face to face training supplementing this where required and regular reminder and update communications being shared via Dechra’s intranet. Training completion rates are monitored monthly with escalation where there is non compliance.

We will continue to drive compliance by our supply chain globally through the Dechra Third Party Code of Conduct, our Third Party Monitoring Platform and “compliance with laws” contract clauses. If any breaches are discovered Dechra will take further action, such as undertaking additional due diligence and investigation, and terminating the contract where necessary.

**Risk Management System:** We have a Third Party Risk Management (TPRM) Platform which is designed to manage the full third party risk management life cycle, from initial entity creation, profiling, tiering and risk assessment, followed by due diligence, ongoing monitoring and potential offboarding. The TPRM Platform provides a Group-wide consistent approach to risk management, as well traceability of decisions, risk rejection or risk mitigation and acceptance. All new suppliers are required to go through the TPRM process before they can be onboarded.

The TRPM Platform currently covers risk assessments and screening on areas of Anti-Bribery and Anti-Corruption, Sanctions, Data Privacy, IT, Modern Slavery, ESG and Health and Safety, with other compliance topics due to be added throughout the next year.

Modern Slavery assessments have been sent out to 144 suppliers since we have used the Platform until the end of our last Financial Year. Where we have identified gaps in a supplier's modern slavery processes, we have advised our internal business that they should monitor the supplier and advise them of our findings. We also ask our Legal team to add relevant Modern Slavery clauses to the contracts.

Due diligence will refresh based on the risk level associated with the supplier and the Third Party Platform will store risk records, with assessments being completed by both employees and third parties within the Platform itself and the mitigating steps taken.

Vendor Threat Monitoring has been carried on all of the CMOs that are on the platform and the monitoring process has commenced for all of the Raw Material Providers. The risks generated have been low, however the ongoing monitoring facility allows us to monitor on a daily basis for any new high alerts.

## **REPORTING AND INVESTIGATING CONCERNS**

Dechra has multiple channels for colleagues, workers and third parties to raise concerns. All concerns are monitored and will be reviewed by the appropriate person.

The 'How to Raise a Concern Procedure' provides employees with the opportunity to raise concerns both through internal channels, via email or call and through an independent hotline, which includes monitoring modern slavery concerns. The procedure provides a route for concerns to be raised confidentially and effectively without fear of repercussion.

This is communicated through Dechra's intranet with translations being available in additional languages, awareness posters and other collateral shared across the business functions.

Dechra's Third Party Code of Conduct provides an email address and an independent externally operated hotline for our third parties to report any situations that they feel violate any of the standards detailed in Dechra's Third Party Code of Conduct.

There have been no concerns raised by third parties, through this reporting avenue or otherwise.



## **FURTHER STEPS**

In order to continually improve Dechra's visibility of its supply chain involving issues related to modern slavery, human trafficking and forced labour, Dechra will continue to develop its risk management system.

In the 2025 financial year, we will provide training on Modern Slavery to our highest risk business areas, including our procurement team. We will provide a checklist for our procurement team to use when reviewing any potential supplier and any ongoing relationships to highlight anything that is of concern. As reported above the Platform includes a specific questionnaire that certain suppliers will need to complete about Modern Slavery, providing Dechra with the ability to measure Modern Slavery risk.

We will ensure that as well as our CMOs, we also carry out Vendor Threat Monitoring on all of our existing and newly onboarded raw material providers.

## **BOARD APPROVAL**

This statement is being made pursuant to section 54(1) of the Modern Slavery Act 2015 and is Dechra's modern slavery statement for the financial year ending 30 June 2023. It covers the following UK legal entities with an annual turnover of over £36 million:

- Dechra Limited; and
- Dechra Veterinary Products Limited

This statement has been approved by the Board of Dechra at its meeting on 4 December 2024 and signed on its behalf by the Chief Executive Officer. This statement will be reviewed, updated, and approved by the Board of Directors on an annual basis.

Jesper Nordengaard, Chief Executive Officer, 4 December 2024