



# Norton Healthcare Limited s172 Statement 2023

The directors of Norton Healthcare Limited are pleased to present this statement in compliance with Section 172 of the Companies Act 2006.

Section 172 of the Companies Act 2006 requires directors to take into consideration the interests of stakeholders in their decision making. This statement highlights the range of issues considered by the Board and some examples of their decisions and activities during the year. This statement also provides highlights of how the Board continues to look after the interests of our stakeholders, including the impact of the Company's activities on the community, the environment, and our reputation.

Acting in good faith and fairly between members, the Board considers what is most likely to promote the success of the Company for its stakeholders in the long term.



# 1. Compliance with directors' duties

## 1.1. Directors' duties

The Board Directors are aware of and understand their duty to act in the way they consider, in good faith, would be most likely to promote the success of the Company for the benefit of its members, and in doing so have regard (amongst other matters) to:

- a. the likely consequences of any decision in the long term;
- b. the interests of the Company's employees;
- c. the need to foster the Company's business relationships with suppliers, customers and others;
- d. the impact of the Company's operations on the community and the environment;
- e. the desirability of the Company maintaining a reputation for high standards of business conduct; and
- f. the need to act fairly as between members of the Company.

The Board has due regard to such matters in the decisions it makes and the impact such decisions may have.

## 2. Relations with stakeholders

The Company has multiple stakeholders including the Government, regulators, customers, suppliers, employees and patients.

### 2.1. Government bodies and regulators

The Board Directors and the Company maintain regular direct and indirect contact with Governmental bodies and regulators as part of the Company's ordinary activities. Examples of key stakeholder engagement activities are as follows:

#### Government

The Company primarily engages with government bodies by drawing on the shared services of Teva UK Limited, an affiliated company, of which the Corporate Affairs team, the Board and senior management engage regularly with ministers and civil servants at the Department of Health and Social Care (DHSC) and the Department for Business and Trade (DBT), as well as officials of the devolved Governments of Scotland, Wales and Northern Ireland.

Extensive consultation and conversations were also held with Government regarding Brexit and its impacts on the pharmaceutical industry, supply and regulation of medicines, and on the patients that the Company serves. This included lobbying the Government in relation to the Windsor Framework (previously the Northern Ireland Protocol), to help reach an outcome that would ensure patients in Northern Ireland continued to have access to the medicines they needed after Brexit.



## Regulators

The Board Directors place the highest priority on compliance with all regulatory requirements and guidance and therefore ensure that senior management maintains regular contact with all relevant medical regulatory authorities in respect of quality and manufacturing activities. The Company predominantly engages with the U.S. Food and Drug Administration (FDA) and Medicines and Healthcare products Regulatory Agency (MHRA) through its quality and regulatory teams in this regard.

The Board encourages and supports opportunities to collaborate with scientific partners and regulators in relation to the introduction of new standards or guidelines developed for the pharmaceutical industry.

## 2.2. Employee engagement

The Board directors recognise the importance of the Company's employees and improving our ways of working and putting our people at the centre of everything that we do remain key priorities throughout 2023. Employee engagement is a central focus of the strategic people plan which is constantly reviewed to ensure it remains relevant.

The Board regularly engages directly, and indirectly, with employees on an ongoing basis throughout the year and the Company has established an employee forum, Engage for Change, whose representatives act as peer-to-peer champions for their colleagues.

The Board directors are also keen to emphasise the importance of regular employee feedback. The business collates this through several channels including surveys, which are undertaken on a regular basis, including annual employee engagement questionnaires. The Board, along with senior management and HR, reviews, analyses and discusses survey outcomes, issues and trends and work with management and employees to implement changes and improvements.

The feedback obtained helped to shape the People Plan for the business in 2023, with key results focusing on the following:

- The Company enhanced its People Leader capability and redesigned and rolled out an end-to-end learning journey for colleagues responsible for leading people;
- The Company designed, developed and successfully launched its Employee Value Proposition (EVP);
- The Company continued its work around equal pay and opportunities;
- The Company delivered improvements across key HR metrics and engagement with its employee performance measurement system;
- The Company enhanced employee reward and recognition with the introduction of new tools and a 'Thank You' campaign, encouraging employees to recognise colleagues that embody company values;
- The Company held two Site Open Days during which employees could bring their families to see the facility, helping employees to build better working relationships and take pride in their work.

### Diversity & Inclusion (D&I)

At the request of and with the oversight of the Board, employees can volunteer their involvement in D&I workstreams (which include gender, race and disability) and champion these important subjects across the Company to help drive positive change in this area. One example of this has been a review of HR policies to make them more accessible, including the introduction of gender-neutral language.

The group's dedication ensures that the Company continues to actively listen to feedback, focus on areas that matter most to employees, and consistently progress towards the workplace becoming even more inclusive and diverse. The Company undertakes Gender Pay Gap reporting each year (a copy of the most recent report can be found at <https://gender-pay-gap.service.gov.uk/employers/9158>).



### 2.3. Patients

Patients are one of the Company's most important stakeholders and at the heart of everything the Company does. Whilst pharmaceutical industry regulations mean that the Company is unable to directly communicate with patients, the Board encourages and supports engagement via key opinion leaders' forums and also patient-centric platforms such as Life Effects.

Life Effects is an online platform, offering peer-to-peer support for those affected by chronic conditions such as multiple sclerosis, migraine, asthma, and mental health. Throughout 2023, Life Effects continued its partnership with Boots to offer additional access to the platform directly from Boots' website, making it more visible and accessible to a wider group of patients.

### 2.4. Suppliers

Teva maintains high ethical, societal and environmental standards for conducting business and does so in accordance with governmental and industry standards, laws, rules and regulations, as well as its own internal policies. The Company expects the same commitment from its suppliers of goods and services. These standards are aligned with the Group's Healthy Future sustainability strategy published on its website: <https://www.tevapharm.com/our-impact>. A Supplier Code of Conduct specifies the primary principles and expectations that the Company requires of its suppliers.

### 2.5. Shareholders

The Company is a wholly owned subsidiary of Teva Pharmaceutical Industries Limited, which is the ultimate parent company of the global Teva Group. The Board regularly reports internally within the Group on the Company's performance, as well as commercial and strategic initiatives.

### 3. Consideration of the impact of the company on the community and environment

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The Board recognises the significance of corporate social responsibility for the Company's purpose and on-going success and it retains a key focus on sustainability via its Healthy Future strategy.

In 2023, employees took part in volunteering activities supporting local charities, as part of the Company's Volunteering Policy, which allows employees to take up to two days per year to undertake volunteering activities. Additionally, the Company introduced regular litter picking groups to keep the local community clean, contributing to their sustainability goals.

The Company is committed to excellence across the whole ESG programme. Part of its social responsibility involves reaching out to the wider community, and in 2023, work experience placements were provided to local school students, giving them a closer look into the world of the pharmaceutical industry.

The Company actively monitors and manages its environmental impact and assesses opportunities for improvements. The information obtained supports its compliance with the Streamlined Energy and Carbon Reporting (SECR) Regulation detailing energy usage efficiency savings, and the Energy Savings Opportunity Scheme (ESOS) which further details efficiency measures and initiatives.

The Company contributes to the Teva Global 2023 Healthy Future Report, a copy of which can be found at: <https://www.tevapharm.com/globalassets/tevapharm-vision-files/teva-esg-progress-report-2023.pdf>