



## Theá Pharmaceuticals Ltd

# Modern Slavery and Transparency in Supply Chains Annual Statement

2022

## Organisation structure and supply chain

### Theá Pharmaceuticals Limited

As subsidiary of the Théa Group, Théa Pharmaceuticals Limited is an innovative company solely dedicated to developing high quality products that support ophthalmic care and eye health across the UK and Ireland. Our extensive range includes both prescription and non-prescription products that are free from preservatives.

We have prescription products for Glaucoma, Inflammation, Infection and Allergy, as well as a range of cutting edge Surgical Pharmaceuticals.

We also have non-prescription products to help alleviate Dry Eye, Blepharitis and Meibomian Gland Dysfunction, along with a range of Eye Nutritionals to generally support eye health and help to maintain vision.

### Theá Group

- **Presentation**

Theá was set up more than twenty five years ago and has played an important role in the latest pharmacological advances. Today, it is the leading independent eye care group in Europe.

Based in Clermont-Ferrand (France), the laboratory has continued to expand by opening more than 30 affiliates and offices in Europe, Russia, North Africa and South America. Currently, the Théa group constitutes a network uniting more than 1600 members of staff worldwide, with its products available in more than 70 countries.

Theá is an independent family group, developed from a Research and Development start-up by Henri Chibret, a fourth generation member of an ophthalmic dynasty. Jean-Frédéric Chibret (a fifth generation family member) has presided over the company since 2008, with Henri Chibret remaining at the head of Théa Holding focused on developing the scientific and financial strategy of the group.

The group is now the leader in several therapeutic classes as well as in the field of preservative-free eye drops. Théa aims to meet the full needs of all ophthalmologists, no matter how they operate or what pathology they are treating, covering the main therapeutic classes. From well-known classics to innovative treatments, in the areas of diagnosis, surgery and therapeutics, Théa offers a complete range of modern products.



- **Key figures**

**In 2021 Théa's turnover amounts to 683 million euros.** A third of Théa's turnover was generated in France by its French subsidiary, and the remaining two-thirds by the different subsidiaries in Europe and the distributors worldwide.

**In 2021, Théa Group has 1561 collaborators worldwide** (30% in France, 70% internationally).

Théa products are available in over 70 countries across the globe, through its affiliates and distributors worldwide.

Indeed, Théa has worldwide 32 subsidiaries and 40 distributors. Théa is resolutely rooted in France, where our headquarters in Clermont-Ferrand host nearly 450 colleagues, but through our affiliate Théa Pharma France—with its norms and regs team, marketing team, and product detailing network—Théa Group also deploys its own sales and marketing infrastructure in countries across Europe including France, Italy, Spain, Germany, Austria, Poland, Portugal, Belgium, Netherlands, Switzerland, Monaco, the UK, Ireland, Romania, Bulgaria, Czech Republic, Russia, Ukraine, Greece, Finland, Sweden, Denmark, and Norway, as well as North Africa (Morocco), the Middle East (Kuwait, Saudi Arabia, United Arab Emirates ), North America (USA and Canada), South America (Mexico, Chile, Peru), plus exclusive sales forces in Algeria and Tunisia and distributors in the rest of the world.

- **Industrial Network**

**Théa's treatments products are mainly produced in Europe, 80% of them in France.**

To better support innovation, Théa identified production outsourcing as a strategic axis from the outset.

**Manufacturing, processing, and packaging are entrusted to the best French subcontractors, according to product type and galenic forms.** This strategy gives our company flexibility and speed promptness while preserving a good profitability.

Meanwhile, Théa maintains control over certain strategic technologies and detains its own factories :

- **Bénac (France):**  
Settled in La Rochelle (in Charente Maritime), Bénac factory is specialized in the production of high technology ophthalmic inserts which deliver active substances during cataract surgery or for other ophthalmic diagnostics. This innovation has widely simplified pre-surgical mydriasis. This production requires know-how and highly specific skills to manufacture these ophthalmic inserts and export them to most of the European countries.
- **Farmila Théa (Italy):**  
Global pioneer in the field of preservative-free eye care products, Théa has built in the region of Milan (Italy) a modern factory to manufacture and pack Abak



bottles (for preservative-free eye drops) and Steri-Free Tubes (for preservative-free gels).

Théa respects high regulatory requirements and apply them internationally.

Also, Théa gets the status of pharmaceutical company respecting the European Good Manufacturing Practices and has the certification ISO 13485.

## Policies in relation to slavery and human trafficking

As the business model of Théa Group lays on mainly French and European suppliers and manufacturers, the risk of slavery and human trafficking in Théa's business is quite low. However, Théa keeps being vigilant regarding this issue.

According to its values and heritage, **Théa strongly opposes modern slavery and trafficking, within the Group or within the companies and stakeholders with which Théa does business worldwide.**

Théa acts accordingly and has developed two internal tools to manage this commitment.

- **Théa has written and implemented its own Code of Conduct in 2019.**

This Code of Conduct defines the key principles and values of the Théa Group. It enables each employee to comply with the applicable laws and regulations and to adopt the right attitude under certain specific situations that he/she may encounter in his/her relationships inside and outside the Group.

The Code of Conduct is the material symbol of Théa Group's responsibility towards its employees and all stakeholders in its business.

The principles on which the Code of Conduct is designed should enable all the employees of Théa worldwide:

- To act in accordance with Théa's values: By working in compliance with the rules in force, Théa maintains the confidence of all the players who have contributed to the success of the Théa Group, its employees and its partners.
- To follow the laws: The guidelines laid down in the Code of Conduct help Théa to work in compliance with the laws and regulations in force in the countries where Théa works.

**The Théa Group subscribes to the principles laid down in the United Nations Declaration of Human Rights and to the Basic principles of the International Labour Organisation that apply to the Théa Group companies.**

**The Théa Group undertakes to ensure compliance with the employment legislation and regulations applicable wherever the Group does business, notably those intended to safeguard the freedom of association, respect for privacy, recognition of the right to negotiate company-wide agreements, the banning of forced, obligatory or child labour, a zero-tolerance approach to**



## modern slavery in our organization and the abolition of illegal discrimination on employment.

- **In 2020-2021, Théa is building a CSR strategy for the whole Group.**

Theá has been working the last months to build a Corporate Social Responsibility approach, that will be applicable to the whole Group.

This strategy will take into account many stakes, including “Promotion of social responsibility in the value chain”. In fact, according to its business model and to its business requirements, Théa is related to many actors and interlocutors along the life cycle of its products: suppliers, manufacturers, logistics companies, etc., mainly in France and in Europe.

Therefore, **within its CSR strategy, Théa will develop specific requirements, processes and KPI regarding modern slavery and trafficking stakes.** Besides, Théa will implement a Responsible Procurement Strategy, that will take this issue into account (tenders, referencing suppliers, business review meetings, etc.).

### Due Diligence processes

In the case of company acquisition, the acquired company is required to comply with the laws in force and is de facto subject to the Théa Code of Conduct.

Verification actions may be carried out where appropriate.

However, Théa is part of a continuous improvement process; its due diligence processes should evolve soon to be more proactive concerning modern slavery and human trafficking when necessary.

### Risk assessment and management

As part of its relationship with its partners, Théa regularly organizes quality audits on site.

Theá is part of a continuous improvement process, particularly regarding risk assessment and management.

### Key performance indicators to measure effectiveness of steps being taken

Theá has not built any key performance indicators yet. However, in a continuous improvement approach, key performance indicators will be defined to ensure that Théa’s commitment against modern slavery and trafficking is fully monitored and reached.



## Training on modern slavery and trafficking

Thea has not yet trained its employees nor stakeholders on how to avoid modern slavery and trafficking. It will be part of Théa's global CSR roadmap. Nevertheless, Théa's Code of conduct is given to be read to all permanent or occasional employees of the Théa Group, and is included in the internal rules of each company of the Théa Group and is therefore binding. The violation thereof engages the responsibility of the perpetrator. The control of its proper application is carried out by managers and executives, but also by each of the employees, whether permanent or occasional, by providing information whenever they become aware of behaviour that would be in contradiction with the code of conduct.


---

### For Théa Group

**David Adoutte**

**Supply Chain & Purchasing Director**

**Date:** 28.06.2022

DocuSigned by:  
 David ADOUTTE  
1AB5635A28B34E4...

### For Théa Pharmaceutical Limited

**Philip Lewis-Williams**

**General Manager**

**Date:** 28.06.2022

DocuSigned by:  
 Philip Lewis Williams  
C40DF92823BB45A...