



VetPartners

Modern Slavery Statement



Modern Slavery Statement

1. Introduction

At VetPartners, we believe everyone has the right to live a life free from slavery in all its forms. We continue to adopt a zero-tolerance approach to modern slavery, and we are committed to continuous improvement in our practices to combat modern slavery.

This is our third modern slavery statement and has been prepared in accordance with the requirements under the Modern Slavery Act 2018 (Cth) (the Act). It sets out the actions we have taken to identify and mitigate modern slavery risks in our business and supply chains, in line with our modern slavery risk management framework.

During this reporting period, we focused on improving our capability to systematically identify modern slavery risks, including by expanding our supply chain mapping, risk assessment, training, and supplier due diligence programs into other areas of our business.

We continue to adopt a risk-based approach, and aim to progressively mature and strengthening our modern slavery risk management framework.

2. Our organisation

This is a joint modern slavery statement covering:

- Australian Veterinary Owners League Pty Ltd (**AVOL**); and
- Its subsidiaries that are required to report under the Act, as detailed in Annexure A. (**Reporting Entities**)

(referred to as the **Group, VetPartners, we, our, us**).

3. Our business

VetPartners was established in 2016 and started as a community of 32 veterinary practices across three states in Australia.

VetPartners has grown at a rapid pace and today, is now a community of over 4,500 people, 250 veterinary practices across Australia, New Zealand and Singapore and a number of other related service businesses.

VetPartners supports its businesses with support offices in Australia and New Zealand. The support offices provide a range of functions such as payroll, finance, IT, legal, risk and compliance, insurance management, procurement and sourcing, human resources, learning and development, recruitment, and marketing.

4. Modern slavery governance

We are committed to continually reviewing and improving our governance processes to ensure our approach to modern slavery is appropriate and effective.

In this reporting period:

- The AVOL Board of Directors (**Board**) was responsible for overseeing the performance and operations of the Group and maintains oversight and approval of the modern slavery statement.
- The Risk Committee maintained responsibility for the Group's overall risk management framework and continuous improvement and monitoring of risk and compliance throughout the Group.
- The Legal Team was responsible for implementing and monitoring our modern slavery strategy and its effectiveness across the Group.
- The VetPartners Executive Leadership Team (**ELT**) was responsible for supervising and implementing specific actions to address modern slavery risks.



5. Modern slavery action

We remain committed to ensuring there is no modern slavery in our supply chains or in any part of our business.

We have in place a risk management framework to:

- Identify and assess potential risk areas.
- Mitigate the risk of slavery occurring.
- Monitor risk areas in our business and supply chains.
- Protect those reporting through grievance mechanisms.

Further detail regarding the framework is set out below.

6. Modern slavery risk management framework

Our modern slavery risk management framework consists of several policies, understanding our supply chains, a due diligence program, contractual provisions, training, and whistleblower protections.

a. Policies

We have in place a Modern Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not permitted anywhere in our business and supply chains. This policy is reviewed annually and applies, and is available, to everyone working for us.

We have developed a Supplier Code of Conduct, which we plan to implement in the next reporting period. We will be expecting that all suppliers we deal with share in the commitments of the Supplier Code of Conduct, including:

- respecting and upholding human rights of their employees and others;
- engaging workers who have capacity, are of legal age and free will and consent to work;
- providing a safe work environment;
- implementing practices to protect rights of workers, and which, at a minimum, conform to universal human and labour rights and legislated employment standards in the relevant jurisdiction.

b. Understanding our supply chains

In this reporting period, we expanded our mapping of supply chains encompassing other areas within the business where modern slavery may present a higher risk, and conducted a risk assessment in those areas to identify potential touch points for modern slavery risks:



Business Risk Area	Supply chains
Procurement	Procurement of pharmaceuticals, equipment, consumables, nutrition products, pet retail products and compounding and pathology services.
IT & Finance	Procurement of professional services, hardware and software.
Property & Construction	Procurement of fire safety services, general maintenance and construction services.

These business areas and associated supply chains were targeted because we identified them as potentially high-risk areas for modern slavery in the last reporting period.



c. Due diligence

We expanded our supplier due diligence program across the key business areas and associated supply chains.

As part of this program, we:

- Identify and review available modern slavery statements submitted by suppliers to the Government's Online Modern Slavery Register; and
- Where residual risks or further clarity is required in relation to a particular supplier's modern slavery risk management practices, we require suppliers to complete a questionnaire and provide us with certain information, prior to initial engagement or upon renewal of an existing engagement.

This process enabled us to:

- Obtain information from suppliers, including information about the supplier itself and about sub-suppliers, to understand how they are addressing their modern slavery risks.
- Identify potential modern slavery risks and determine appropriate risk mitigation measures.
- Communicate our Modern Slavery Policy and expectation of suppliers to ensure modern slavery is not taking place in the supply chain.

d. Training

To ensure a high level of understanding of modern slavery, our risk management framework and the potential risks of modern slavery in our business and supply chains, we expanded our training program to all employees who manage relationships with suppliers in our Procurement, IT, Finance, Property and Construction teams.

We also expect our suppliers to have trained and built the same level of awareness amongst their employees and in their supply chain.

e. Contracts

In this reporting period, we endeavoured to include our modern slavery contractual provisions in all new (or renewed) contracts with suppliers in the key business areas. The contractual provisions:

- Require suppliers to adhere to our due diligence program.
- Require suppliers to have their own Modern Slavery Policy, training, due diligence program and annual auditing.
- Require suppliers to report any actual or suspected modern slavery in their business or supply chains.
- Allow ongoing monitoring and auditing of suppliers.
- Allow us to terminate or suspend the contract if modern slavery risks are identified.

f. Protection of Whistleblowers

We continue to have in place a Grievance Complaint Resolution Policy, a Whistleblower Policy and Whistleblower Protected Disclosure Procedure, which provides mechanisms for our community to identify and escalate modern slavery concerns, including autonomously through an external provider.



7. Modern slavery risks

Given the size and nature of our operations and supply chains, we adopt a targeted, risk-based approach to identifying and assessing modern slavery risks in our business and supply chains.

In this reporting period, there have not received any reports of actual or suspected modern slavery brought to our attention arising from our business or supply chains.

We recognise that there continues to be inherent risks of modern slavery occurring within the products and services which we procure due to a combination of industry, geography, and product/service type.

Following our risk assessment of key business areas and associated supply chains, we have identified the following modern slavery risks:

Business Area	Risks identified
Procurement	<ul style="list-style-type: none">• Employment or engagement of contractor, seasonal, migrant or base-skilled workers.• High risk geographic locations for sourcing raw materials and manufacturing of products.
IT & Finance	<ul style="list-style-type: none">• Employment or engagement of contractor, seasonal, migrant or base-skilled workers.• Third party labour agency arrangements.• High risk geographic locations for sourcing products and services.• Purchasing goods at risk of being produced with forced labour, such as IT equipment.
Property & Construction	<ul style="list-style-type: none">• High risk industry for migrant labour exploitation.• High demand for base-skilled labour force.• Poor visibility over long and complex supply chains.• Low-tier suppliers operating in high-risk geographies.• Tight project deadlines and seasonality.• Third party labour agency arrangements.

8. Remediation program

In our previous modern slavery statement, we proposed remediation action that we intend to implement if we identify suppliers that perpetrate or are at high risk of perpetrating modern slavery offences.

We remain committed to no tolerance of modern slavery practices and would move to immediately suspend any supplier that has engaged in any conduct which does not demonstrate acceptable human management practices.

We appreciate the importance of our role in remediating modern slavery and are committed to strengthening our remediation framework. In the future, we plan to develop a formal guide or process that not only outlines our proposed remediation action in the context of suppliers, but that also demonstrates our dedication to restoring individuals and groups who have been directly or indirectly harmed by our business activities, and our commitment to restorative corrective actions.



9. Auditing and verification

In the last reporting period, we planned to develop and implement an audit program however, we ultimately focused our resourcing on improving our capability to identify modern slavery risks. We felt that properly identifying and understanding modern slavery risks across the key business areas was a crucial first step in our overall risk management framework.

Notwithstanding this, we recognise the importance of evaluating the effectiveness of actions taken to combat modern slavery and, in the next reporting period, we intend to develop and implement an audit program which measures the effectiveness of actions taken and provide plans to track ongoing performance.

10. Further steps and priorities

- Modern slavery risks will continue to be monitored and reported on through the Risk Committee.
- Review and update, if necessary, our Modern Slavery Policy.
- Dive deeper on high-risk suppliers by conducting further due diligence and in-depth assessments of supply chain risks.
- Continue training and refreshing our team members' understanding and awareness of modern slavery risks and expectations of risk assessment in key business areas.
- Develop and implement an audit program for assessing the effectiveness of our modern slavery risk management framework.
- Continue to communicate our expectations to suppliers, through our due diligence procedures and contractual provisions mandating modern slavery compliance.
- Implement our Supplier Code of Conduct by obtaining a commitment from suppliers to adhere to the code.
- Continue to promote our Modern Slavery Policy, Whistleblower Policy and Protected Disclosure Procedure to our team members, contractors, and suppliers.

Consultation and approval process

This joint modern slavery statement has been prepared by Australian Veterinary Owners League Pty Ltd in consultation with the Reporting Entities. This joint statement was approved by the Board on 29 June 2023.

Mark Jeffery

Director, Australian Veterinary Owners League Pty Ltd



Annexure A

Reporting Entities

Australian Companies	ACN
AAH Finance Pty Ltd	603 185 664
AAH Group Pty Ltd	603 162 750
Adelaide Animal Hospitals Pty Ltd	056 094 029
Albion Vet Surgery Pty Ltd	604 357 575
Alpha Holdings Pty Ltd	009 222 217
AMS Alexandria Pty Ltd	159 296 750
Animal Cancer Specialists Pty Ltd	663 898 226
Animal Cancer Specialists (Sydney) Pty Ltd	663 871 494
Anne M.Dynon Pty Ltd	007 229 129
Aussie Paws Operations Pty Ltd	602 977 631
Australian Animal Hospitals Pty Ltd	163 674 593
Balwyn Veterinary Surgery Pty Ltd	007 005 414
Brisbane Veterinary Specialist Centre Pty Ltd	649 265 421
Brunswick Central Operations Pty Ltd	606 046 164
Caring Vets Pty Ltd	147 445 154
Cremorne Veterinary Hospital Pty Ltd	164 736 127
Debritz Holdings Pty Ltd	060 040 155
Eastside Veterinary Emergency and Specialists Pty Ltd	152 072 467
FAH Veterinary Pty Ltd	158 292 810
Figtree Veterinary Hospital Pty Ltd	128 187 093
Fitzroy Operations Pty Ltd	606 046 173
Greenfields Veterinary Hospital Pty Ltd	099 276 758
Herriot House Pty Ltd	054 914 162
Illawarra Animal Hospital Pty Limited	657 022 289
Kest Pty Ltd	100 687 983
Kogarah Veterinary Centre Pty Ltd	109 710 849
Manraco Pty Ltd	000 859 254
ML & L Pty Ltd	151 647 906
My Pet Hub Balaclava Pty Ltd	645 431 625
My Pet Hub Redlynch and Brinsmead Pty Ltd	645 499 949
National Veterinary Care Pty Limited	166 200 059
Noice Investments Pty Ltd	062 122 507
Northern Suburbs Veterinary Hospitals Pty Ltd	005 021 456
North Shore Veterinary Holdings Pty Ltd	134 502 382
North Shore Veterinary Hospitals Pty Ltd	125 697 387
NVC Operations NSW Pty Ltd	605 428 804
NVC Operations Pty Ltd	605 403 923
Ourimbah Veterinary Hospital Pty Ltd	001 969 286
Parramatta Veterinary Surgical Specialists Pty Ltd	116 436 170



Australian Companies	ACN
Patfast Pty Ltd	003 657 010
Peninsula Vet Care Pty Ltd	643 105 597
Pet General Aberfoyle Pty Ltd	610 200 792
Pet General Burpengary Pty Ltd	610 200 809
Pet General Clayfield Pty Ltd	611 895 633
Pet General Corio and Lara Pty Ltd	610 200 818
Pet General East Bentleigh Pty Ltd	617 718 608
Pet General Ferntree Gully Pty Ltd	613 436 543
Pet General Forest Hill Pty Ltd	610 923 236
Pet General Grafton Pty Ltd	611 922 402
Pet General Indooroopilly Pty Ltd	610 200 827
Pet General Lakehaven Pty Ltd	613 363 965
Pet General Lincoln Pty Ltd	610 200 836
Pet General Pty Ltd	109 952 650
Pet General Quakers Hill Pty Ltd	614 728 175
Pet General Salisbury Pty Ltd	616 176 008
Pet General V4P Pty Ltd	610 243 037
Pet General Vineyard Pty Ltd	613 220 429
Petcorp Bankstown Pty Ltd	125 794 194
Petcorp Bexley Pty Ltd	115 485 151
Petcorp Epping Pty Ltd	128 084 355
Petcorp Guildford Pty Ltd	161 009 098
Petcorp Parramatta Pty Ltd	125 678 355
Petcorp Ryde Pty Ltd	142 207 994
Petcorp Waverley Pty Ltd	604 425 121
Robin G. Stanley Pty Ltd	058 250 098
SheppVets Pty Ltd	005 042 884
Southpaws Vet Mornington Pty Ltd	639 420 116
Southpaws Vet Pty Ltd	109 528 341
Southpaws Vet Specialists Mornington Pty Ltd	639 260 067
Sunbury All Creatures Pty Ltd	121 056 077
Townsville Operations Pty Ltd	633 240 936
Tredream Pty Ltd	606 980 401
Universal Vet Services Pty Ltd	647 627 147
UVG (Aust) Pty Ltd	169 353 342
UVG (IP) Pty Ltd	169 352 265
UVG (USA) Pty Ltd	164 701 277
UVG Holdings Pty Ltd	169 348 798
V4P Pty Ltd	610 187 525
Vet Centre Montrose Pty Ltd	619 714 108
Vet Ventures Pty Ltd	620 258 960
Veterinary Happiness Redland Bay Surgery Pty Ltd	098 804 258
Veterinary Surgical Associates Pty Ltd	095 259 779



Australian Companies	ACN
Vet Partners (Annandale Animal Hospital Pty Ltd)	659 408 849
Vet Partners (Vets at Acacia Garden) Pty Ltd	659 451 260
Vet Partners (Vets at North Rocks) Pty Ltd	659 440 865
VetPartners ACT Pty Ltd	622 815 641
Vetpartners Adelaide Plains Veterinary Surgery Pty Ltd	646 573 631
Vetpartners Albany Creek Veterinary Surgery Pty Ltd	659 312 893
Vetpartners Aus Pty Ltd	110 059 599
Vetpartners Australia Pty Ltd	114 962 453
Vetpartners Belconnen Animal Hospital Pty Ltd	650 366 957
VetPartners Canberra Equine Hospital Pty Ltd	622 879 903
VetPartners Castle Hill Pty Ltd	625 297 556
VetPartners Fawkner Veterinary Hospital Pty Ltd	641 635 896
Vetpartners Gables Veterinary Group Pty Ltd	652 472 501
Vetpartners Hawthorn Group Vet Clinics Pty Ltd	651 845 126
Vetpartners North Shore Veterinary Emergency and Specialists Pty Ltd	652 122 131
VetPartners NSW Pty Ltd	619 455 346
VetPartners NVC Pty Ltd	638 517 389
VetPartners Operations WA Pty Ltd	616 463 560
Vetpartners Peninsula Vet Pty Ltd	650 146 320
Vetpartners Perth Animal Eye Hospital Pty Ltd	651 200 743
VetPartners Perth Veterinary Specialists Pty Ltd	641 122 634
Vetpartners QLD Pty Ltd	616 534 939
VetPartners Rossmore Pty Ltd	638 023 980
Vetpartners SA Pty Ltd	624 130 650
VetPartners South Eastern Animal Hospital Pty Ltd.	079 555 427
Vetpartners Southern Animal Health Pty Ltd	657 435 991
Vetpartners Supervets Pty Ltd	649 415 421
Vetpartners Vetcall Mermaid Waters Pty Ltd	661 378 516
VetPartners VIC Pty Ltd	616 845 517
VetPartners WA Pty Ltd	615 695 719
Vetpartners Whitehorse Veterinary Hospital Pty Ltd	649 587 539
VetWest Pty Ltd	009 452 233
VetWest WA Pty Ltd	604 012 839
Wambivet Pty Ltd	140 554 801
Whitehorse Veterinary Hospital	147 538 225
Willoughby Veterinary Hospital Pty Ltd	618 088 467
Wysch Pty Ltd	119 499 491