



# Modern slavery statement FY24

LAST UPDATE: 19/12/2024

## Acknowledgement of Country

Pet Circle acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respects to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

## A message from Pet Circle

At Pet Circle, we recognise the importance of addressing modern slavery risks within our operations and supply chains. In FY24, we laid the foundation for a comprehensive sustainability framework, enabling the development and implementation of key environmental, social, and governance initiatives. This framework will guide our ongoing approach to responsible sourcing and transparency.

During FY 25, we will ensure our team remains informed of evolving regulatory requirements and risks in higher-risk regions, enabling proactive responses and informed decision-making. We will update and strengthen our Supplier Code of Conduct, and encourage them to conduct their own risk assessments to enhance accountability across our supply chain.

We will also enhance training programs for our staff to ensure they can identify and address modern slavery risks effectively and review our trade partners and private label suppliers to improve transparency over our supply chain and operations. We will monitor changes in legislation, and explore opportunities to share and access risk assessments within the industry, to promote collective action against modern slavery.

By implementing these measures, Pet Circle aims to strengthen its modern slavery compliance and promote accountability and transparency within its supply chains and operations, reinforcing our reputation as a responsible and ethical business.



Michael Frizell

Chief Executive Officer and Director

*This statement was approved by the board of Millell Pty Ltd in their capacity as principal governing body of Millell Pty Ltd on 19.12.2024.*



# 1. Reporting & Consultation

This modern slavery statement has been prepared to meet the requirements of the Modern Slavery Act 2018 (Cth). It outlines the steps taken by Millell Pty Ltd (ABN 17 148 151 213), trading as Pet Circle, to identify and address modern slavery risks during the period 1 July 2023 to 30 June 2024 (FY24).

To comply with the Modern Slavery Act 2018 (Cth), Pet Circle addresses the following key criteria in this statement:

- **Identify the reporting entity**  
Details about the reporting entity are provided on page 4 of this statement.
- **Describe our structure, operations, and supply chains**  
A description of Pet Circle's structure, operations, and supply chains is available on page 5-8.
- **Describe our modern slavery risks**  
The specific risks of modern slavery practices within Pet Circle's operations and supply chains are outlined on page 12-14.
- **Actions taken to address modern slavery risks**  
Pet Circle outlines the steps it has taken to assess and address modern slavery risks on page 16-18.
- **Assessing the effectiveness of our actions**  
This statement explains how Pet Circle evaluates the effectiveness of its efforts to mitigate modern slavery risks on page 19.
- **Describe the process of consultation**  
The consultation process undertaken is described on page 4 of this statement.
- **Other relevant information**  
Additional details, including Pet Circle's goals for FY25, are provided on page 20-21 of this statement.



## Consultation

Our team engaged with key stakeholders across Pet Circle, including management and buying teams, to gather insights into our supply chains and operations. This process involved reviewing existing measures to monitor and address modern slavery risks. The draft statement was then shared with members of our executive leadership team for their feedback and input before being finalised for approval.

## 2. Our Structure, Operations, and Supply Chains

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Pet Circle, founded in 2011, has become a leading online pet retailer. We pride ourselves on offering a wide range of high-quality, pet products, including premium pet food and treats, engaging toys, stylish and practical accessories, and essential health and medication supplies. With a strong customer-first focus, Pet Circle has redefined convenience for pet owners through a seamless online shopping experience, fast delivery, and expert advice – ensuring happy, healthy pets.

Over the years, Pet Circle has expanded its operations and services to enhance the care we provide to pets and their families. This includes partnerships offering pet insurance and prescription products, the launch of our own delivery fleet in Western Australia, online veterinary advice available via our website, and an ever-growing range of private label products spanning food, treats, toys, bedding, and cat trees/scratchers.

Beyond serving individual pet families, Pet Circle is committed to making a broader, positive impact. We actively support animal welfare organisations through partnerships with rescue shelters, welfare groups, and community initiatives. These efforts help ensure that pets in need receive the love, care, and premium pet supplies they deserve, extending our mission to support all pets, not just those in our customers' homes.



## Structure & Operations

Pet Circle's website and app form the cornerstone of its operations, delivering a streamlined online shopping experience for pet owners. The platform features intuitive navigation and a robust search function, enabling customers to easily find products for various pets, including dogs, cats, birds, fish, reptiles, and small animals. By creating pet profiles, users receive personalised product recommendations and relevant content tailored to their pets' specific needs.

A notable feature is our Auto Delivery service, allowing customers to schedule regular deliveries of essential items like food and medications, ensuring pets never run out of necessities and offering savings on recurring orders. Each product page provides

comprehensive information, including detailed descriptions, ingredient lists, feeding guidelines, and customer reviews, assisting pet owners in making informed purchasing decisions.

The platform also offers a wealth of educational resources, such as articles, blogs, and guides on various pet care topics, empowering pet owners with the latest knowledge and best practices. A dedicated customer service team is available to assist with orders, product inquiries, and expert pet care advice, ensuring a supportive shopping experience.

The Pet Circle app enhances this experience by providing features like order tracking, easy reordering from previous purchases, and management of Auto Deliveries. Our app ensures that pet owners can conveniently access Pet Circle's services anytime, anywhere.



## Our People

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Pet Circle is powered by a grounded, resourceful, and determined team of pet lovers who are committed to strengthening the bond between pets and their families. With diversity and collaboration at the heart of our operations, we foster cross-functional teamwork to develop innovative solutions and challenge industry norms. This dynamic approach allows us to continually evolve and disrupt the market with fresh ideas, always keeping pets and their well-being at the core of everything we do.

Our team spans multiple locations, with a strong presence in Australia, where we employ or engage approximately 500 individuals across five key sites. This talented group supports

essential business areas, including Marketing, Supply Chain & Operations, Technology, Finance, People & Culture, Merchandising, Customer Experience, Data & Analytics, Product, and Veterinary Support. Globally, our reach extends to the Philippines, where approximately 60 team members contribute their expertise in Finance, Customer Service, Marketing, Merchandising, People & Culture, Veterinary Support and Technology. In New Zealand, a dedicated team of six professionals plays a vital role in supporting our operations.

This global team structure enables Pet Circle to deliver exceptional service and expertise across every facet of our business. Above all, we are united by our shared passion for pets, continuously innovating and educating to provide the best possible care for pet families.



## Supply Chains

Pet Circle is dedicated to operating with transparency, responsibility, and ethical sourcing in mind. To deliver exceptional service, Pet Circle has built a robust supply chain supported by strategically located warehouses across

Australia. These facilities, combined with our logistics network, enable us to provide fast and reliable delivery to both metropolitan and regional customers.

Our warehouses and delivery fleet focus on fulfilling orders safely, efficiently, and ethically, while maintaining quality at every stage.





### 3. The products we sell

Pet Circle offers a diverse selection of pet products sourced from leading brands across the globe, ensuring quality and variety for pet owners. Our extensive range includes products from Australia, New Zealand, the United States, China, Taiwan, Vietnam, Malaysia, Thailand, and various European countries. This global selection allows us to cater to the unique needs of pets and their owners, providing access to both local favourites and internationally acclaimed products.



## Some of our International Brands

- **Royal Canin** - a global leader in pet nutrition, offering tailored diets for various breeds and life stages.
- **Hill's & Hill's Science Diet (Colgate-Palmolive)** - renowned for scientifically formulated pet foods addressing specific health needs.
- **Purina (Nestle)** - provides advanced nutrition for pets, including Supercoat, Fancy Feast, and Pro Plan.
- **Mars Brands** - including Whiskas and Pedigree, offering trusted food options for cats and dogs.
- **Eukanuba** - offers premium pet food with high-quality animal protein as the primary ingredient.
- **KONG** - known for durable and engaging pet toys that promote mental stimulation.
- **Greenies** - specialises in dental treats that help maintain oral health in pets.
- **NexGard** - provides effective flea and tick prevention solutions for dogs.
- **Frontline** - offers a range of parasite control products for pets.
- **Seresto** - known for long-lasting flea and tick collars for dogs and cats.
- **Advocate** - provides broad-spectrum parasite protection for pets.
- **Open Farm** - focused on ethically sourced, premium-quality pet food.

## Some of our Australian Brands

- **Advance** - manufactures premium pet food tailored to Australian pets' needs.
- **Black Hawk (Masterpet)** - offers natural pet food made with high-quality ingredients.
- **Ivory Coat** - provides grain-free pet food options with Australian-sourced ingredients.
- **SavourLife** - produces natural treats and donates 50% of profits to pet rescue organisations.
- **Vetalogica** - offers Australian-made pet supplements and natural foods.
- **Instinctive Bite** - provides Australian-made pet food focusing on natural ingredients.
- **Nature's Cuts** - specialises in natural, Australian-sourced pet treats.
- **Kazoo** - offers a range of pet accessories and toys designed in Australia.
- **Fuzzyard** - provides stylish pet apparel, accessories, and toys.
- **Huskimo** - known for Australian-designed pet clothing and accessories.

The manufacturers of our private label brands are based in Australia, New Zealand, Thailand and China.

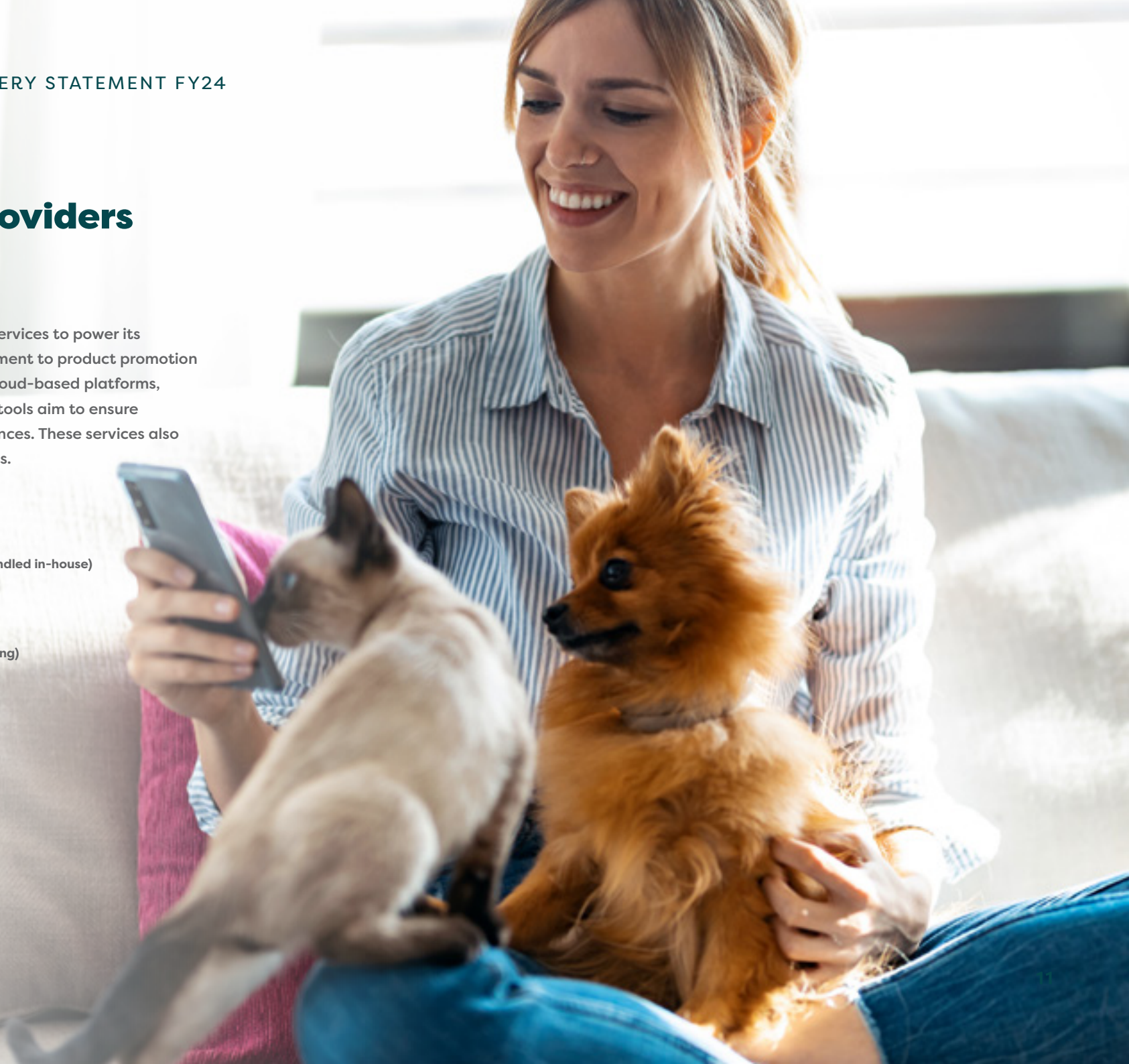


## 4. Our service providers and partners

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Pet Circle relies on a range of essential services to power its operations, from headquarters management to product promotion and distribution. Key technologies like cloud-based platforms, logistics systems, and digital marketing tools aim to ensure efficiency and smooth customer experiences. These services also support community initiatives and events.

- Freight and logistics services
- Recruitment and staffing services
- Information technology (IT) support (if not handled in-house)
- Communication services
- Waste management and disposal
- Professional services (legal, financial, consulting)
- Cleaning services
- Security services
- Packaging materials
- IT equipment
- Graphic design and printing
- Office supplies
- Uniforms and staff apparel



## 5. Our modern slavery risks



### Product risks

Pet Circle recognises that modern slavery risks are inherent in certain industries due to the complexities associated with raw materials and labour. While these specific risks have not been identified within Pet Circle’s current supply chain, the business remains vigilant and acknowledges that these challenges are prevalent across the broader sector. Pet Circle is aware of the industry-wide risks linked to these areas and is committed to upholding high ethical standards throughout its sourcing practices.

Pet Circle relies on the modern slavery statements of its larger suppliers to understand and address supply chain risks. By reviewing these publicly available statements, the company gains insights into ethical practices, risk mitigation strategies, and compliance frameworks, ensuring suppliers meet its ethical standards and commitment to responsible sourcing.

This approach allows Pet Circle to prioritise partnerships with brands actively addressing modern slavery risks. Larger suppliers provide a reliable benchmark with their robust due diligence and monitoring systems, helping Pet Circle align with regulatory

requirements and strengthen its reputation as an ethical retailer.

To enhance its efforts, Pet Circle will educate its staff to identify and mitigate risks while monitoring key areas, including own-label products, third-party suppliers, and technology items.

We are aware of industry-wide modern slavery risks related to:

#### Pet Food – Dry

Dry pet food is usually made from grains, vitamins, and processed animal proteins. Reported risks include forced labour in food production facilities in China and exploitation in grain farming. Labor exploitation in

abattoirs and meat processing facilities has been identified in several countries, including China, Malaysia, and Australia. Reports from the Walk Free Foundation highlight significant risks in these sectors, including poor working conditions, exploitative practices, and a lack of adequate protections for workers. These findings underscore the need for stringent oversight and ethical practices within global meat supply chains.

#### Pet Food – Wet

Wet pet food incorporates fresh meat, fish, poultry, grains, and vegetables. Reportedly, forced labour in fishing and seafood processing is prevalent in Thailand, Vietnam, and China. Labour exploitation in abattoirs has also been reported as noted above.

#### Pet Food – Seafood

Seafood-based pet foods often incorporate fishmeal and fish oil derived from a variety of fish species. The Walk Free Foundation has



reported significant risks of forced labour in the fishing sectors of Thailand, Vietnam, China, and even Australia. These risks are compounded by exploitative working conditions, lack of worker protections, and limited transparency across global seafood supply chains. These findings highlight the need for checks and a focus on ethical sourcing practices within the seafood and pet food industries.

**Pet Treats and Supplements**

Pet treats and supplements, made from natural ingredients, face reported risks of labour exploitation in meat processing facilities. Also, sourcing additives from India and China reportedly carries risks due to limited regulatory oversight.

**Toys and Accessories**

Pet toys and accessories, commonly made from rubber, plastic, and fabrics, have been linked to reports of child and forced labour in rubber production, particularly in Thailand and Malaysia. Additionally, exploitative working

conditions and labour abuses in manufacturing facilities have been documented in China, Vietnam, and Indonesia.

**Pet Clothing, Bedding and Furniture**

Pet clothing and bedding use cotton, polyester, wool, and synthetic fibres. Reported risks include forced labour in cotton harvesting in China and Uzbekistan, and labour exploitation in textile production in Vietnam, Bangladesh, China, Thailand, and Malaysia.

Products like scratching posts use textiles, wood, and foam. Reported risks include labour exploitation in textile production, timber harvesting, and foam manufacturing in regions with poor labour regulations.

**Veterinary and Pharmaceutical Products**

Veterinary and pharmaceutical products involve chemicals used in treatments. Reported risks are prevalent in chemical manufacturing in China and India, with inadequate labour protections and oversight.

**Pet Grooming Products**

Shampoos, conditioners, brushes, and combs often contain palm oil and rubber. Palm oil production in Malaysia and Indonesia is linked to forced and child labour, while rubber production in Thailand and Malaysia has documented exploitation.

**Pet Collars and Leashes**

Leather, nylon, and synthetic materials used in collars and leashes are associated with reported forced labour in leather production in India and Bangladesh, and exploitation in nylon and synthetic fibre manufacturing.

**Pet Bowls and Feeding Accessories**

Bowls and accessories made from stainless steel, plastic, and ceramics face significant risks of labour exploitation throughout their supply chain. These risks are particularly pronounced in the mining of raw materials such as iron ore, used for stainless steel; petroleum-based materials for plastics; and minerals like clay and silica for ceramics. Countries with lax labour laws or

inadequate enforcement, such as India, China, and certain nations in Africa and Southeast Asia, have been identified as high-risk regions for labour exploitation and unsafe working conditions in these industries.

The Walk Free Foundation reports that in some cases, forced labour and child labour are prevalent in the extraction of raw materials, with workers often subjected to hazardous environments, long hours, and unfair wages. Similarly, poor conditions in factories processing these materials, particularly in countries like China and Vietnam, contribute to exploitation across the supply chain.

**Pet Carriers and Crates**

Carriers and crates, made from plastic, metal, and fabric, are linked to reported risks of exploitation in metal mining and textile production in high-risk regions.



## Services risks

While Pet Circle has not identified specific modern slavery risks in its service procurement, our business acknowledges potential vulnerabilities in certain industries and among its partners. Sectors such as logistics, cleaning, security, call centres, and IT services, which often rely on casual, subcontracted, or migrant labour, highlight the need for robust supply chain oversight, ethical sourcing practices, and strict adherence to labour compliance to address and mitigate these risks effectively.

### Freight and logistics services

Reported risks include the use of subcontracted labour and migrant workers, often associated with low wages, excessive working hours, and poor working conditions, particularly in warehouse operations and trucking sectors both domestically and overseas. For a business like Pet Circle, which depends heavily on freight services for timely delivery of customer orders, especially during peak periods, these risks may arise from reliance on external logistics providers who may subcontract tasks to lower-cost operators without stringent labour oversight.

### Labour hire and staffing services

Modern slavery risks, such as deceptive recruitment practices, wage theft, and coercion, are particularly prevalent among temporary and migrant workers. For Pet Circle, which relies on labour hire companies to source temporary staff for warehousing and customer service during peak periods, these risks may arise if the labour

hire companies do not adhere to fair recruitment practices or fail to protect workers' rights. However, the human resources policies, training, governance frameworks, and operational controls in place across our offices and fulfilment centres ensure a low risk of child labour or any form of forced labour within our local operations.

### Information technology (IT) support and maintenance

Risks include the use of low-paid workers in offshore IT centres, particularly in regions such as India, the Philippines, and Eastern Europe, where oversight of labour conditions may be limited. For a business like Pet Circle, which relies on IT services for e-commerce operations, app development, and cybersecurity, these risks may arise if IT functions are outsourced to third-party providers in regions with weaker labour protections.

### Communication services

Risks include exploitative practices in call centres, particularly in countries like India and the Philippines, where workers may face long hours, low wages, and limited labour protections. Pet Circle's reliance on customer support centres for handling enquiries and resolving issues may inadvertently expose the business to these risks if support functions are outsourced to providers in high-risk regions.

### Waste management and disposal

Risks involve the exploitation of waste management workers, often in informal or subcontracted roles, where hazardous conditions and lack of protections are common, especially in developing countries. For Pet Circle, which generates waste from packaging and operational activities, risks may arise from reliance on subcontracted waste management companies with limited oversight of worker conditions.



**Professional services (legal, financial, consulting)**

While generally lower-risk, subcontracting or outsourcing to lower-cost providers in developing countries can involve exploitative practices. For a business like Pet Circle, risks may exist if professional service providers outsource administrative tasks to regions where labour protections are weaker, creating potential vulnerabilities in the supply chain.

**Cleaning services**

Risks include the use of subcontracted or migrant labour, often associated with low pay, excessive hours, and limited workplace protections. For Pet Circle, which relies on cleaning services to maintain its offices, warehouses, and distribution centres, these risks may occur if cleaning companies subcontract tasks to workers who may not receive fair wages or protections.

**Security services**

Risks include exploitative labour practices, particularly for subcontracted security personnel who may work excessive hours for minimal pay. For Pet Circle, which employs security services to safeguard its facilities, these risks may exist if security providers fail to ensure fair conditions for their personnel.

**Packaging materials**

Reported risks involve forced labour in timber, paper, and plastic production, particularly in regions such as Southeast Asia and South America. For a business like Pet Circle, which sources packaging materials (or, in the case of private label, relies on its co-manufacturers to source packaging materials) to ship products, risks may arise from suppliers relying on raw material providers with poor labour standards in high-risk regions.

**IT equipment**

Risks include forced labour and exploitative practices in the manufacturing of electronic components, particularly in countries like China, Malaysia, and Taiwan. For Pet Circle, which uses IT equipment for its e-commerce platform, inventory management, and internal communications, these risks may arise if hardware suppliers source components from regions with documented labour violations.

**Graphic design and printing**

Risks include exploitative labour practices in printing facilities and the use of raw materials, such as ink and paper, sourced from regions with poor labour protections. For Pet Circle, which uses printing services for promotional materials and catalogues, risks may arise if providers source paper and other materials from suppliers in high-risk areas.

**Office supplies**

Risks include forced or child labour in the production of raw materials, such as timber for paper products, in high-risk regions. For a business like Pet Circle, these risks may occur when purchasing everyday office supplies such as paper, pens, and other materials sourced from low-cost providers.

**Uniforms and staff apparel**

Risks include forced labour in textile and garment manufacturing, particularly in countries such as Bangladesh, China, and Vietnam. For Pet Circle, which provides uniforms for warehouse and distribution centre staff, these risks may arise if suppliers rely on garment manufacturers in regions with poor labour conditions or weak oversight.

## 6. Actions taken to address our modern slavery risks



### Product risk mitigation

Pet Circle will engage in ongoing due diligence, the development of robust company policies and procedures, and close collaboration with our suppliers. We are dedicated to obtaining further transparency over our operations, with a strong focus on identifying, preventing, and addressing potential human rights concerns associated with our supply chains.

#### Our Internal Policies

We have the following policies and procedures to assist us in working with our employees and suppliers as we continue to identify modern slavery risks and uphold worker human rights across all parts of our operations:

#### Modern Slavery Code of Conduct and Supplier Commitment

This Code and Commitment has not yet been rolled out and is scheduled for implementation in FY25. We have developed this Code which outlines Pet Circle's commitment to identifying, preventing, and addressing modern slavery risks

across its operations and supply chains. It provides clear guidance for employees and suppliers on recognising and mitigating modern slavery risks and reinforces our zero-tolerance approach to forced labour, trafficking, and exploitation. Moving forward, suppliers will be required to commit to adhering to the Code and Pet Circle's standards on modern slavery. It will help us ensure that suppliers take accountability for their own operations and any authorised subcontractors, helping to mitigate risks within our supply chain.

#### Whistleblower Policy

This policy provides a safe and confidential channel for employees, suppliers, and partners to report any suspected unethical, illegal, or exploitative behaviour, including modern slavery risks. By

fostering transparency and accountability, the policy supports the identification and resolution of potential human rights violations.

#### Equal Employment Opportunity Policy

This policy promotes fairness, equity, and diversity in Pet Circle's hiring and workplace practices. By ensuring recruitment processes are free from discrimination, it helps prevent exploitative practices and supports the protection of workers' rights.

#### Code of Conduct

The Code of Conduct sets behavioural expectations for all employees and contractors, emphasising respect for human rights and adherence to ethical practices. It establishes the foundation





for a workplace culture that rejects any form of exploitation, including modern slavery.

**Bullying and Harassment Policy**

This policy safeguards employees from workplace harassment and bullying, ensuring a safe and respectful working environment. By addressing power imbalances and protecting worker dignity, it helps reduce vulnerability to coercion or exploitation.

**Sexual Harassment Policy**

This policy strictly prohibits sexual harassment in the workplace, ensuring all employees feel safe and supported. It contributes to preventing exploitative

behaviours that can create an environment conducive to modern slavery risks.

**Grievance Resolution Procedure**

This procedure provides employees with a formal mechanism to raise and resolve workplace concerns, including issues related to unethical labour practices. By ensuring all grievances are addressed transparently and fairly, it supports Pet Circle's commitment to upholding workers' rights.

**Work Health and Safety Policy**

This policy ensures safe and healthy working conditions for all employees across Pet Circle's operations. By addressing potential risks to

worker welfare, it reduces the likelihood of unsafe conditions that could contribute to modern slavery-like practices.

**In FY25, Pet Circle will prioritise the development of more targeted modern slavery policies to address specific risks within its operations and supply chains. These enhanced policies will provide clearer guidance and expectations for employees and suppliers, reinforcing the company's commitment to ethical**

**practices. As part of this initiative, Pet Circle will also develop and roll out modern slavery awareness training programs for staff, focusing on these new policies and raising awareness about modern slavery. This training will equip employees with the knowledge and tools to identify, prevent, and address modern slavery risks, ensuring a consistent and proactive approach across all areas of the business.**

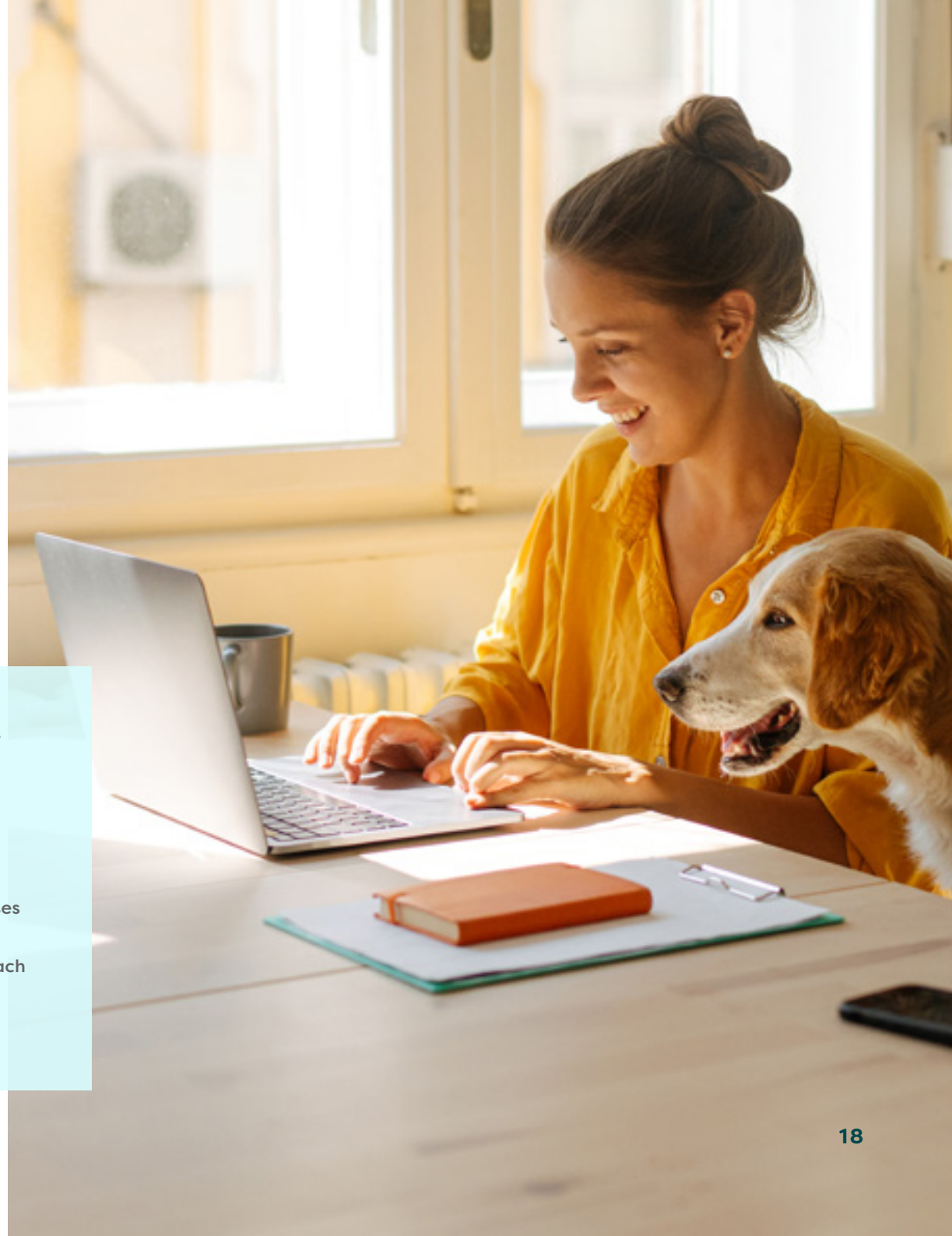
## **Services risk mitigation**

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We understand the modern slavery risks across our operations and supply chains, for services such as freight and logistics, recruitment and staffing, IT support, communication services, waste management, professional services, cleaning, security, packaging materials, IT equipment, graphic design and

printing, office supplies, and uniforms and staff apparel.

We assess vendors through internal team evaluations at the time of onboarding. We are committed to continuously improving these processes and will undertake a comprehensive review in FY25 to enhance our approach to mitigating modern slavery risks.



## 7. Assessment of actions taken to address risks

Pet Circle has simple feedback mechanisms to collect insights from employees, suppliers, and temporary workers. These channels allow concerns related to modern slavery or unethical practices to be raised.

Pet Circle recognises the need to enhance these processes and plans to review its approach to managing supplier risks in FY25.



## 8. Moving forward

Pet Circle is committed to working on the following initiatives as key goals for FY25. While the company will strive to implement them as far as possible within the year, any unfinished initiatives will remain an ongoing focus to ensure continuous improvement.

### Executive Engagement

Pet Circle will form a modern slavery working group, which will provide regular updates to the Executive Leadership Team (ELT) on modern slavery initiatives. This will ensure the ELT remains informed about evolving reporting requirements in Australia and New Zealand and the risks associated with sourcing products from higher-risk regions, such as Southeast Asia. These updates will enable proactive decision-making, ensuring compliance and reinforcing responsible sourcing across all levels of the organisation.

### Supplier Code of Conduct and Commitment

Pet Circle will implement its Supplier Code of Conduct to reflect evolving ethical standards and responsible sourcing practices. The updated Code will be distributed to all suppliers, who will

be guided through its requirements and asked to confirm their commitment. This initiative will strengthen supply chain integrity and request suppliers adhere to ethical practices, mitigating risks of modern slavery and unethical behaviour. Pet Circle will require suppliers to conduct risk assessments of their own supply chains and provide evidence of due diligence. This will improve visibility into second- and third-tier suppliers, encouraging greater accountability and fostering stronger partnerships.

### Training and Resources

Pet Circle will introduce a new modern slavery training program to equip staff, particularly category management and private label teams, with the skills to identify and mitigate modern slavery risks. The program will include updated compliance checklists, practical resources, and awareness tools such as videos and online guides. By empowering staff with this knowledge, Pet Circle will improve supplier evaluations, ensure compliance, and foster ethical sourcing practices across the business.

### Trade Partner Review

Pet Circle will conduct a Trade Partner Review to gain deeper insights into suppliers, particularly those operating in higher-risk regions. This review



will evaluate suppliers' oversight of subcontractors and raw material sources, enabling the business to identify and address risks at all levels of the supply chain. The process will help maintain compliance, protect the brand's reputation, and build trust with consumers through ethical sourcing.

### **Responsible Buying Plan**

Pet Circle will develop and implement a Responsible Buying Plan that provides practical guidance and tools (such as checklists) for its buyers. This plan will support ethical purchasing decisions by reinforcing modern slavery risk management principles, particularly for higher-risk products. By equipping buyers with clear, actionable guidelines, Pet Circle will promote transparency and mitigate potential legal and reputational risks.

### **Monitoring and Awareness**

Pet Circle will actively monitor changes in modern slavery legislation and reporting requirements to ensure compliance and enhance due diligence processes. The business will conduct regular supplier checks, implement risk reduction measures, and require suppliers to provide evidence of ethical labour practices. This vigilant approach will strengthen the company's commitment to transparency, ethical sourcing, and compliance.

### **Review of Private Label Suppliers**

Pet Circle is committed to ensuring its own brand

products are ethically sourced and free from modern slavery practices. To achieve this, the company will undertake a comprehensive review of its private label supply chain. This includes identifying and tracing the origin of materials and products (as far as is possible) to ensure all factories and facilities comply with Pet Circle's Supplier Code of Conduct. Pet Circle's goal is to work exclusively with suppliers that adhere to its ethical standards and demonstrate a commitment to transparency and fair labour practices. By prioritising suppliers who do not engage in modern slavery, Pet Circle aims to always engage in responsible sourcing.

### **Accessible and Shared Risk Assessments**

Pet Circle will actively seek opportunities to access and share modern slavery risk assessments and audits through industry collaborations and publicly available resources. By leveraging collective knowledge and insights, this initiative aims to strengthen efforts to address modern slavery risks and improve transparency across the industry. For example, Pet Circle may participate in collaborative platforms which allow businesses to share supplier audit results and risk assessments. This approach not only reduces duplication of audits but also fosters a shared responsibility for promoting ethical practices across the supply chain. Such collaborations would enable Pet Circle to identify high-risk areas more efficiently and contribute to industry-wide improvements in combating modern slavery.



**petcircle**