



# Modern Slavery

**Statement 2020**

For the year ending 31 December 2020



**Disclosure Note regarding Reporting Entities**

This statement has been made by TopCo Investments Australia Pty Ltd ("Real Pet Food", "RPF", "we" or "us"), on its own behalf and on behalf of V.I.P. Petfoods (Aust.) Pty Ltd and Australian Pet Brands Pty Limited, and all entities owned or controlled by it. RPF is the Australian holding company in the global Real Pet Food group of companies ("Real Pet Food Group" or "RPF Group").

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## About Real Pet Food Group

Real Pet Food Group is a large, global pet food company that is committed to giving pets everything they need and nothing they don't. We believe in staying real and doing right by our pets, our fellow pet parents, and our planet.

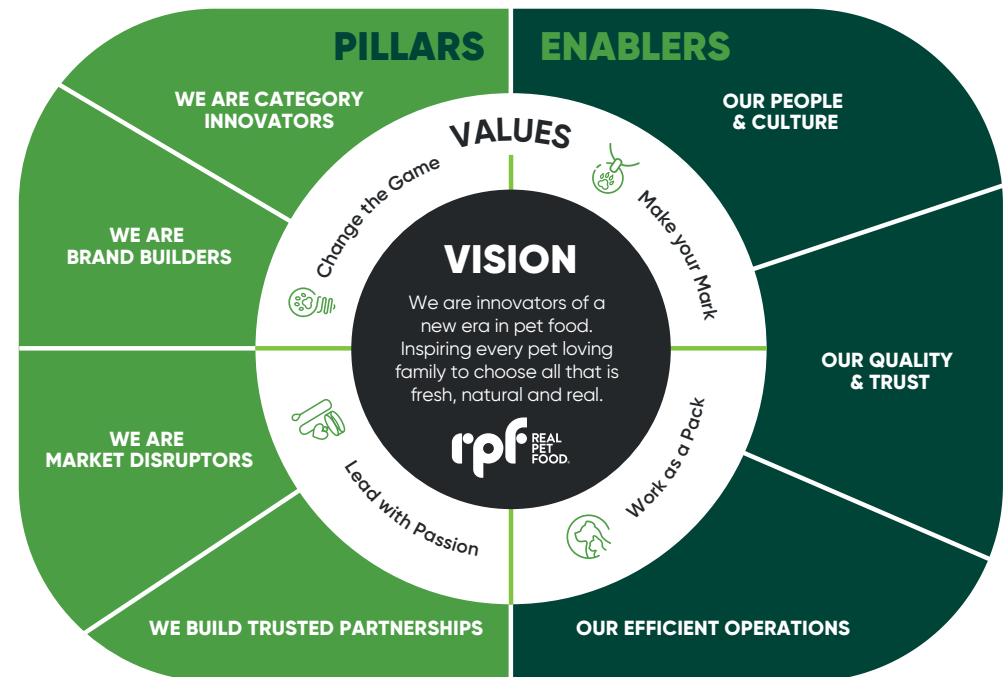
### Our Values and Behaviours

At the RPF Group we believe every pet deserves to enjoy the taste of fresh nutrition.

We aim to transform the way we feed our pets: allowing more of the world's pets to eat real by giving them the real food they deserve – rich with nutrients, free from harmful substances, and full of flavour

Our enablers to deliver this are our people & culture; and strong systems and processes when it comes to safety, quality and reliability to ensure a positive impact on people and planet; and our drive for continuous improvement.

We continue to build trusted partnerships with our workers, our business partners, our customers and our stakeholders.





Statement from our CEO

**RPF acknowledges our responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Commonwealth Modern Slavery Act 2018.**

**We commit to ensuring that all aspects of our operations and our supply chain are assessed for modern slavery practices or human trafficking in any form, and clear mitigation strategies are put in place. We will, together with our supply chain partners, act ethically and in accordance with laws and conventions around the world that deal with the treatment of people.**

**This Statement was approved by RPF's Board of Directors on 20 May 2021. The Board will review and update the Statement annually.**



**David Grant**  
Group Chief Executive Officer



# Highlights

## 2020 Modern Slavery Risk Management Initiatives

In 2020 we focused on enhancing our understanding of our modern slavery risks and impacts.

With the support of external consultants, we conducted a review of our systems and processes and undertook an operational gap analysis to identify risk and opportunities and enhance our risk management systems. We mandated a Modern Slavery Working Group which is comprised of senior leaders from key areas of our business.

The Working Group developed a practical and comprehensive modern slavery action plan which includes a high-level three-year road map that will inform our risk management approach. We ran a baseline awareness survey for relevant staff to determine levels of understanding of modern slavery across our business. RPF Group provided high-level awareness training to our Senior Leadership Team across Australia, New Zealand, Singapore and the UK on the implications modern slavery has on our business. We also trained our Risk and Sustainability Committee.

RPF Group rolled out our first modern slavery training module to all staff across all global locations and developed a modern slavery fact sheet for staff that is accessible from our intranet site.

In an effort to integrate modern slavery risk management across our operations, we reviewed our risk assessment matrix and included a social impact category which focuses on human rights and labour rights. We also identified and implemented a dedicated tool for capturing modern slavery risk data.

We reviewed and updated our Supplier Code of Conduct and developed a modern slavery fact sheet for suppliers.

We documented and prioritised our Tier 1 (direct) suppliers and supply categories against internationally recognised modern slavery risk indicators and invited 22 of our highest risk AU (and NZ) suppliers (accounting for 50% of our high risk spend) to participate in a self-assessment questionnaire. Twenty suppliers (91%) completed the questionnaire, and we will continue to work with them to implement corrective actions in 2021. More details of actions taken are included under Criteria 4.

The Modern Slavery Reporting Requirements aim to support the Australian business community by improving transparency about modern slavery. The reporting requirement will increase business awareness of modern slavery risks and reduce modern slavery risks in the production/supply chains of Australian goods and services.

## Our Plans for 2021

In 2021 we will implement priority Year 2 actions documented in our Modern Slavery Action Plan and continue to raise awareness about modern slavery risks among key internal stakeholders including our Board and executive, employees and contractors. A training needs analysis (informed by the baseline awareness survey) will further inform the roll out of a modern slavery eLearning module for RPF staff.

The Modern Slavery Working Group will work with key stakeholders to continuously improve and update policies, procedures and contract clauses as our understanding of risks matures. We will implement a program to ensure traceability back to source for our highest risk commodities and establish a comprehensive supplier monitoring program.

In 2021 we will extend our supplier due diligence program and undertake supplier surveys of an additional 33 high risk AU (and NZ) suppliers to capture 75% of

total high risk AU (and NZ) spend across 8 procurement categories. We will also undertake deep dive supplier analysis of our five highest risk/highest spend international suppliers based in Thailand and China. These five suppliers make up 90% of our spend from high-risk countries supplying into our AU (and NZ) market.

## Our Plans Beyond 2021

Beyond 2021 we will review, extend, evaluate and improve our modern slavery risk management program. Our priority will be to establish performance standards and evaluation criteria for our suppliers, develop and review corrective action plans with identified high risk suppliers and undertake mapping of our priority Tier 2 suppliers.

We will review worker feedback collection opportunities for identified at-risk workers in our supply chain and document a remedy pathway aligned to our crisis management framework.

# Reporting Criteria 1 & 2: Structure, Operations & Supply Chains

## Our Organisational Structure

RPF Group is a large, global pet food company, and RPF has close to 1,000 employees in Australia. RPF Group is a privately-owned business, with its ultimate holding entity, TopCo Investments Pte. Ltd., incorporated in Singapore. RPF Group has operations in Australia, New Zealand, China, UK, Singapore and USA.

RPF's operations include owning and operating pet food manufacturing facilities, including managing and overseeing the working conditions of our employees. RPF's operations also include the sale, marketing and distribution of our pet food and related products. The entities within RPF covered by this statement are listed in Annexure A.

## Our Governance Framework

We have a Modern Slavery Compliance Officer who coordinates our modern slavery risk management response. The Modern Slavery Compliance Officer heads up our Modern Slavery Working Group and oversees the implementation of our modern slavery action plan and road map. All issues related to modern slavery risk and compliance within our operations and our extended supply chain are

directed to the Modern Slavery Compliance Officer who undertakes relevant action, in conjunction with RPF's broader Modern Slavery Working Group.

As a member of our Senior Leadership team (SLT), the Modern Slavery Compliance Officer reports quarterly to RPF's Risk and Sustainability Committee.

## Our Policies

We have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers, that are reviewed regularly. This policy framework ensures that our team members and suppliers clearly understand our expectations, can recognise when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint.

The following policies are those that are most relevant to preventing and addressing modern slavery among our team members and workers in our supply chains.

### 1. Whistleblowing Policy

We encourage all our staff, customers and business partners to report any concerns related to the direct activities, or the supply chains of, the Company.

### 2. Employee Code of Conduct

Our Code makes clear to our employees the actions and behaviours expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour.

### 3. Supplier Code of Conduct

Our Supplier Code of Conduct reflects the standards and practices we expect from all our Suppliers. Broadly this includes an expectation to adhere to a range of social, environmental and safety related requirements, including modern slavery and labour rights requirements.

### 4. Recruitment Policy

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

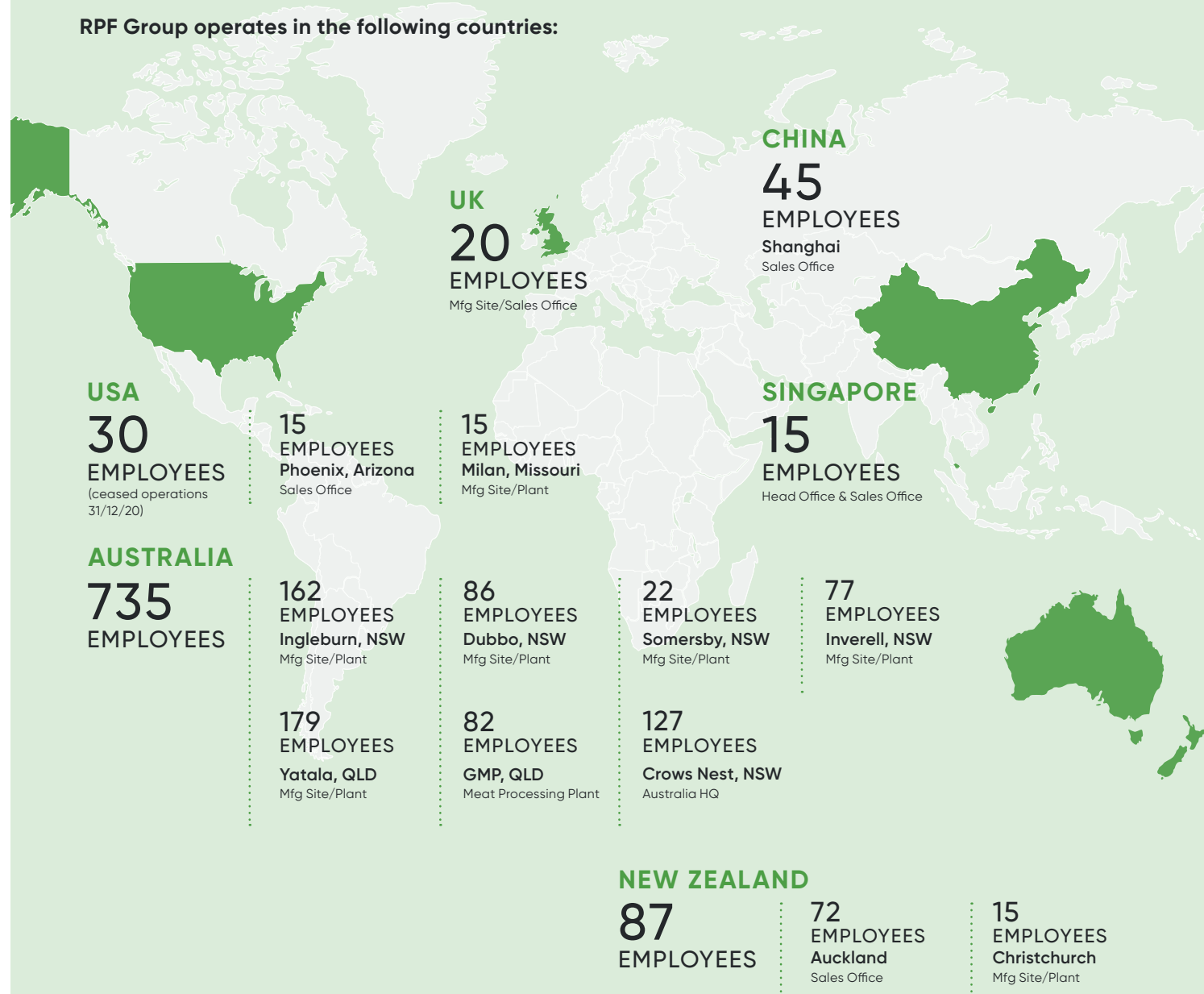


# Our Operations

The RPF Group is involved in manufacture & distribution of dry, wet, fresh, chilled and treats Pet Foods (For Cats and Dogs) in Australia, China, NZ, UK, Asia and USA.

Additionally, RPF also owns a game meat processing facility which process Kangaroo, Wild Boar and Deer. This meat is then sold into European human consumption markets and the rest is used in pet food manufacture in Australia.

RPF Group operates in the following countries:





# Our Brands

We are passionate about delivering a diverse range of products within our Real Brands. More information on each brand is available [here](#).

TRILΔGY™



Benyfit Natural  
The Premium Raw Dog Food People



JIMBO'S



# Our Supply Chain

RPF's annual procurement spend is approximately AU\$481 million with 1,934 suppliers across 30 goods and services categories. Over 80% of our spend and three-quarters of our suppliers are based in Australia. The majority of our international suppliers are located in the USA and New Zealand, however we also procure from a small number of suppliers in China, Germany, UK, Singapore, Netherlands, Thailand, Italy, Vietnam and Serbia (see map over page).

## What we buy

The main categories of goods and services procured from our direct suppliers are included in the table on the right. Whilst many of our direct suppliers are based in Australia, the source country of some of the products we procure (such as food additives) are yet to be mapped.

Further work will be undertaken to better understand our extended supply chain (and the inherent modern slavery risks).

## Where we buy it

The map on the following page provides an overview of the geographic locations of our suppliers, number of suppliers, percent of total spend in each country and the main categories of goods and services procured. The map provides an indication of modern slavery risk in each country based on the SD Strategies country risk rating tool.

Note: AU (and NZ) and USA include top 10 categories of spend only.

## GOODS



MEATS, POULTRY/  
SEAFOOD



FOOD  
ADDITIVES



AGRICULTURAL  
PRODUCTS



OILS (FISH,  
SUNFLOWER, EMU)



FINISHED  
GOODS



PACKAGING



OFFICE FURNITURE/  
FITTINGS/SUPPLIES

## SERVICES



CLEANING  
SERVICES



GRAPHIC DESIGN/  
PRINTING SERVICES



TRANSPORTATION  
AND LOGISTICS



MACHINERY



PPE AND  
CLOTHING



MAINTENANCE  
SERVICES



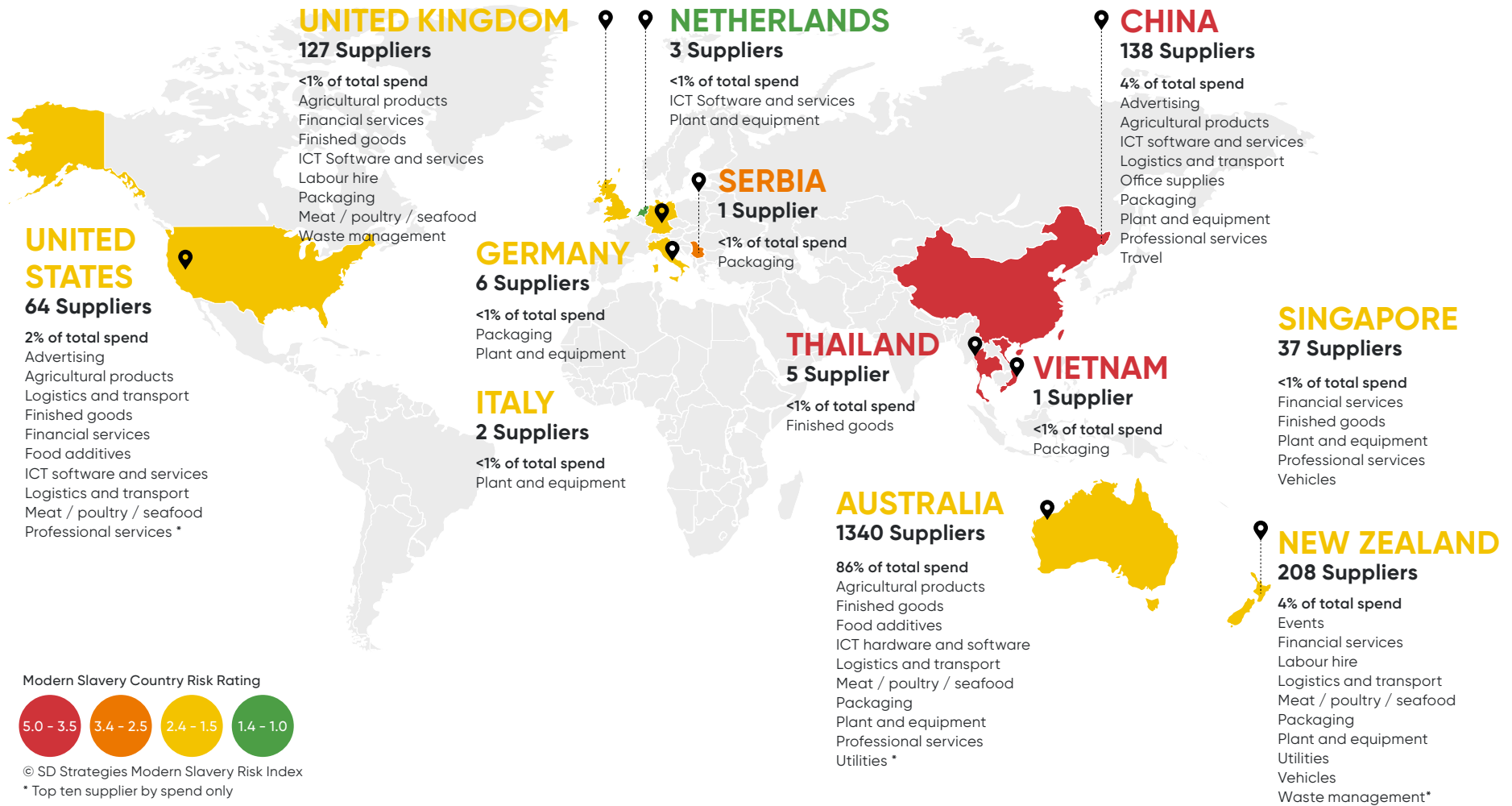
LABOUR HIRE



PROFESSIONAL  
SERVICES

# Tier 1 supplier locations

(93% of spend is sourced from low risk countries)



© SD Strategies Modern Slavery Risk Index  
 \* Top ten supplier by spend only

# Reporting Criteria 3: Modern slavery risks in operations and supply chain

Our focus in 2020 was to enhance our understanding of modern slavery risks in our operations and supply chain and focus our due diligence efforts on our highest risk Tier 1 (direct) suppliers.

## **Operational risks**

With the support of external expertise, RPF Group undertook a modern slavery gap analysis that involved members of RPF's Senior Leadership Team (SLT) representing procurement and supply, finance, information and technology, human resources, and operations.

The purpose of this initial workshop was to:

- Identify gaps in our systems and processes that may increase our exposure to modern slavery risks in our operations and supply chains.
- Identify opportunities to improve and enhance our systems and processes.
- Inform the development of our modern slavery risk management program.

## **Supply Chain risks**

In 2020 we focused on obtaining a deeper understanding of our Tier 1 risks and the operational processes in place to manage those risks. We engaged external expertise to help us document, assess and prioritise our Tier 1 (direct) suppliers against modern slavery risk indicators and identified our top five highest risk procurement categories.

We engaged our high risk AU (and NZ) suppliers and undertook a supplier review process with an initial 22 suppliers (making up 50% of our high risk spend). This is an ongoing process, and we will undertake further due diligence of priority suppliers in 2021.

**We engaged external expertise to help us document, assess and prioritise our Tier 1 (direct) suppliers against modern slavery risk indicators and identified our top five highest risk procurement categories.**



# Operational risks

## Modern Slavery Gap Analysis

The Modern Slavery Working Group undertook a gap analysis to identify areas of improvement across five key categories:

- management systems
- human resources and recruitment
- procurement and supply chain
- risk management
- customers and stakeholders

The analysis identified gaps and opportunities for better managing our response to modern slavery risks and human rights due diligence more broadly. We acknowledge that we are at the starting point of our modern slavery journey and recognise that there is much work to do. This first year has enabled us to better understand the essential elements of an effective modern slavery risk management program and expand our existing governance and ethical sourcing programs to better capture and respond to these risks.

As an Australian company committed to complying with workplace laws, we consider the risk of modern slavery to be low within our direct business operations. We recognise however that the risks of modern slavery are enhanced through our supply chain and other third-party relationships.

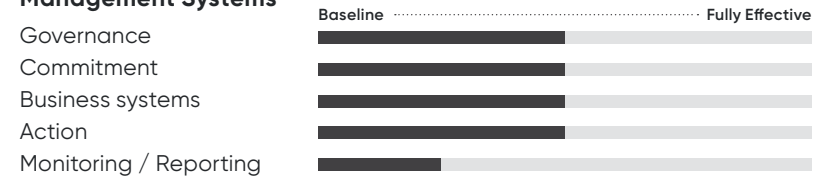
Importantly, our Board and SLT is committed to identifying and addressing modern slavery risks in our operations and supply chain and have committed resources to this process.

The results of the Gap Analysis informed the development of our Modern Slavery Action Plan and Roadmap, developed collaboratively with key representatives across our organisation. The three-year road map has established a clear pathway for us to follow. Elements of the action plan and roadmap are included in Criteria 4 'Actions Taken to Assess and Address Risk' below.

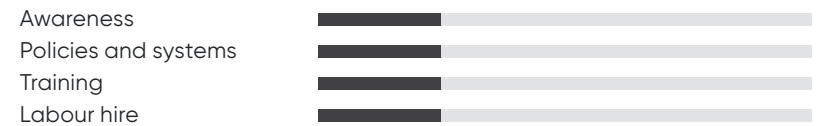
The following table provides the results of our modern slavery gap analysis:

## Modern Slavery Program – Gap analysis results

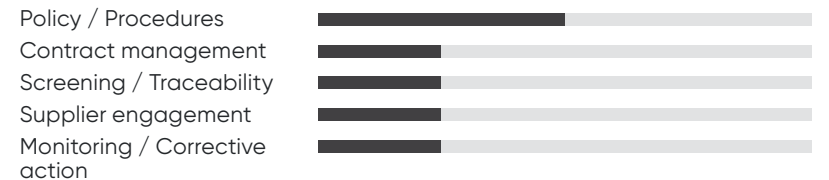
### Management Systems



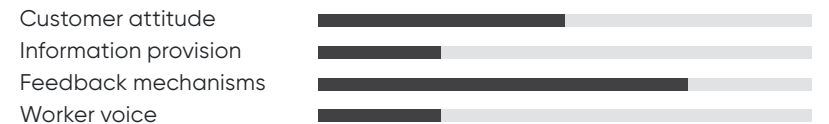
### Human resources



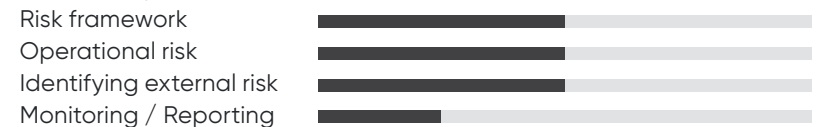
### Supply chain



### Customers/ stakeholder



### Risk management



# Supply chain risks

## HIGH LEVEL FINDINGS

- Approximately two-thirds of our procurement spend has potential risks for modern slavery.
- Our highest potential spend categories are across raw materials, packaging materials and co-manufactured finished goods.
- Finished goods are supplied by contract manufacturers located in countries ranked as high risk for modern slavery.
- 93% of our suppliers are based in low risk countries.

## KEY FINDINGS

AU\$481M 1,934

### TOTAL SPEND ANALYSED

for modern slavery risk across five markets: AU (and NZ), US, UK, China and Singapore.

### TOTAL SUPPLIERS ANALYSED

for potential modern slavery risk. High level reporting provided on 293 suppliers (with spend > AU\$250K) accounting for 90% of total spend.

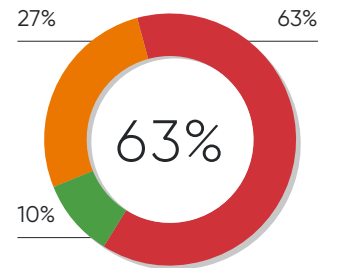
#30

### SPEND CATEGORIES ANALYSED

for potential modern slavery risk across the six RPF markets. Nineteen categories were determined to be high potential risk.

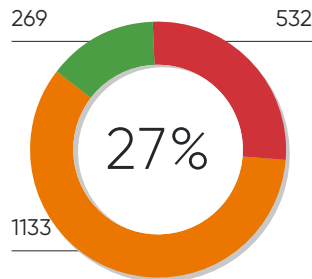
### % SPEND HIGH RISK

Approximately two-thirds of RPF's spend (AU\$305M) with suppliers was ranked as potentially high risk for modern slavery.



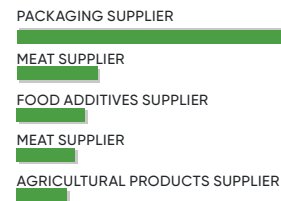
### % HIGH RISK SUPPLIERS

532 suppliers out of the 1,934 assessed were ranked as a potentially high risk for modern slavery.



## TOP 5 SUPPLIERS BY SPEND

RPF top 293 suppliers by spend were ranked for potential modern slavery risk. Of the top 20 suppliers by spend 15 are ranked as high risk and four as medium risk for modern slavery.



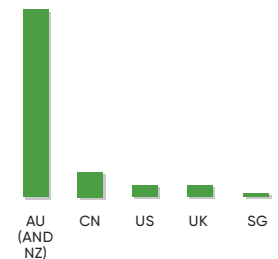
## TOP 5 HIGH RISK CATEGORIES

High risk categories for modern slavery by spend based on geography (country of manufacture), industry sector and commodity.



### HIGHEST RISK MARKET

AU (and NZ): due to the level of spend, use of potentially high-risk goods and services (e.g. labour hire) and sourcing from industry sectors and countries with poor labour practices.



# Supply chain overview

Our procurement team, supported by external experts, analysed AU\$481 million of procurement data for potential modern slavery risk against four key risk indices:

- Industry sector – Specific industry sectors (for example manufacturing, ICT, construction etc) deemed as high risk in international and national guidance documentation.
- Commodity/product – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- Geographic location – Based on estimated in-country prevalence of modern slavery determined by a custom risk index developed by the external experts engaged to support our program. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters which may have elevated risk of poor labour standards and modern slavery.
- Workforce profile – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where children, low skilled, vulnerable, or migrant labour is used, or where the work is deemed as ‘4D’ work (Dirty, Dull, Degrading or Dangerous).

## Risk by Spend.

Analysis of just over AU\$481 million of spend across our operations identified 63% of spend as potentially high risk for modern slavery. This is largely due to our spend on meat, poultry, seafood and agricultural products.

A further 27% of spend was categorised as medium risk for modern slavery and 10% as lower risk.

## Risk by Suppliers

Analysis of suppliers indicates that 532 of 1934 suppliers assessed are potential high risk for modern slavery.

With 93% of our suppliers based in countries that are considered low risk, we believe this greatly reduces our exposure to Modern Slavery across these 532 suppliers. In year 2 we will work to substantiate this through the Supplier Assessment Program.

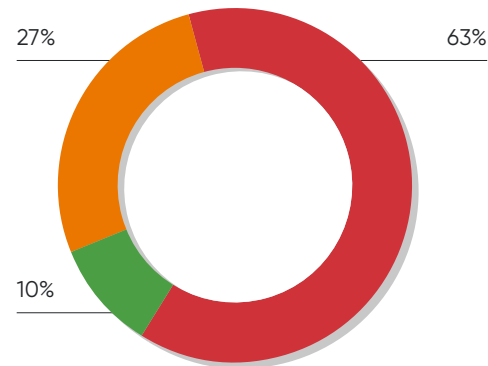
We will continue to gather data on the provenance of raw materials used in the products we sell. This will enable us to gain a better understanding of potential risk in our extended supply chain both in Australia and internationally, prioritise the engagement of high-risk suppliers and take appropriate action to manage it.

## DATA at a Glance

Total Spend	Total Suppliers	Supplier Spend range analysed (smallest to largest)	Number of spend categories (goods and services)
<b>AU\$481M</b>	<b>1,934</b>	<b>AU\$252,000 - AU\$25M</b>	<b>30</b>

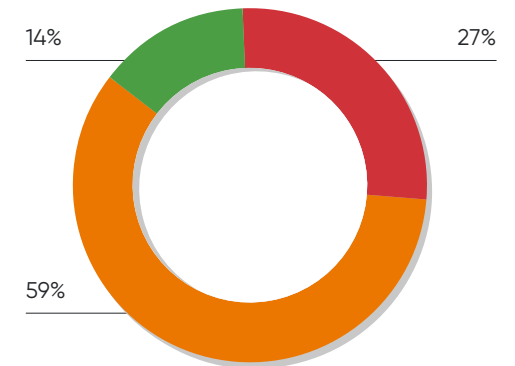
Important note: Our focus in 2020 has been on understanding risks posed by higher spend Tier 1 suppliers. We recognise that there may be risk amongst our lower spend suppliers and our extended supply chain and will incorporate these into future risk assessments

## Risk by Spend



Given our high exposure to agriculture supply chains, approximately AU\$300m of spend is in the high-risk category for potential modern slavery risk.

## Risk by Suppliers



Over a quarter of the suppliers assessed have potential high exposure to modern slavery in their operations and supply chains

# Data at a Glance

## Risk by Category

Based on the four risk factors outlined above, 19 of our 30 spend categories are potentially high risk for modern slavery.

Our highest risk categories by overall spend include:

- Meat/poultry/seafood
- Agricultural products
- Food additives
- Packaging materials
- Finished goods

These five categories account for 85% of our high risk spend.

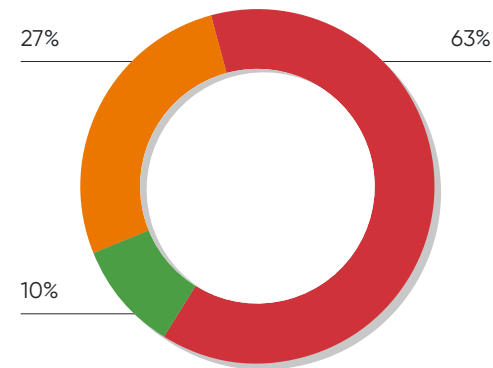
Higher levels of modern slavery risk associated with these spend categories is due to country of manufacture (primarily China and parts of Asia), the industry sectors involved (agriculture and manufacturing) and commodities (timber, plastic, chemicals).

## Risk by Market

The RPF Group operates in six markets – Australia and New Zealand (AU and NZ), UK, China, Singapore and USA. Analysis of our supply chain risk by market identified that our highest risks are within the AU (and NZ) market due to our procurement of large quantities of potentially high-risk goods and services from industry sectors with limited evidence of modern slavery risk management practices.

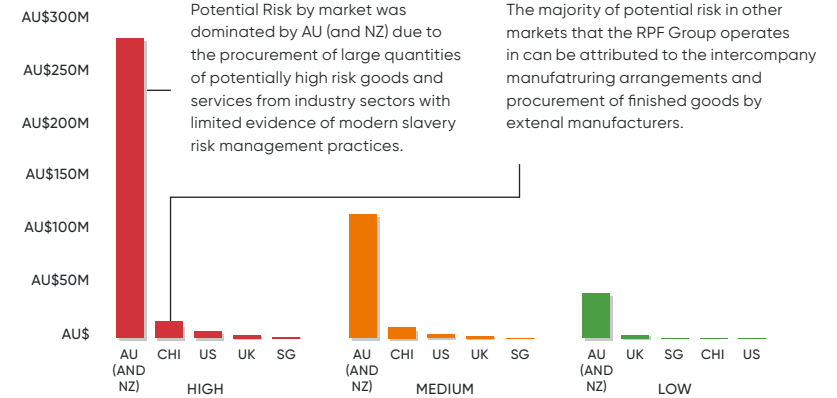
The majority of potential high-risk products in other markets that the RPF Group operates in can be attributed to the intercompany manufacturing arrangements and procurement of finished goods by external manufacturers. We recognise that we have several potentially high-risk direct suppliers in China and Thailand and will be undertaking further due diligence of these suppliers in 2021.

## Procurement categories with potential exposure to modern slavery risk



Two-thirds of our direct and indirect materials and services we procure are deemed as potentially high risk.

## Risk by Market





# Reporting Criteria 4: Actions taken to assess and address risk

**Our modern slavery gap analysis informed the development of our modern slavery action plan and three-year road map.**

## **Modern Slavery Action Plan and Road Map**

**A cross-disciplinary team, which included members of our Leadership Team, worked collaboratively to develop a focused modern slavery action plan and a three-year road map. These include actions for enhancing our approaches to modern slavery governance, due diligence, risk and compliance; procurement and supply chain systems and processes; supplier engagement; HR and recruitment; and modern slavery awareness, training and communications (both internally and externally).**

**The following actions were completed in this reporting period:**

### **Staff Awareness Survey**

At the commencement of our modern slavery risk management program, we ran a baseline awareness survey for relevant staff to determine levels of understanding of modern slavery across our business. The results indicated that while 60% of participants think there a risk of modern slavery in our supply chain and consider the issue highly relevant to RPF, close to one-third of participants could not define modern slavery. The results of this baseline survey will inform our modern slavery awareness and training programs and enable us to measure the effectiveness of these programs (see Case Study 1).

### **SLT engagement and training**

We worked with external consultants to deliver a modern slavery awareness raising workshop to our SLT. Since the initial engagement, we have continued to communicate our progress to our leadership team and seek input and support on this important issue from across our business divisions. We also engaged other key management groups such RPF's Board of Directors, and the Risk and Sustainability Committee.

To maintain our momentum and monitor the rollout of our program, modern slavery will be a regular agenda item in monthly Procurement update meetings to the SLT.

### **Staff Training**

We rolled out our first modern slavery awareness module to all staff across all global locations and developed a modern slavery fact sheet for staff accessible on our intranet site.

# Reporting Criteria 4: Actions taken to assess and address risk

## Document Review

We undertook a broad review of our policies and procedures and identified opportunities to incorporate modern slavery risk management into existing policy frameworks and operational processes. Policies and procedures will continue to be developed and/or refreshed in collaboration with policy owners.

## Modern Slavery Gap Analysis

With the support of external consultants, we conducted a review of our systems and processes and undertook an operational gap analysis to identify risk and opportunities and enhance our risk management systems. Results of our Gap Analysis are included under Reporting Criteria 3.

## Modern Slavery Action Plan

The Working Group developed a practical and comprehensive modern slavery action plan which includes a high-level three-year road map that will inform our risk management approach moving forward. Our Plan includes actions addressing gaps in our governance and due diligence processes, risk management, supply chain management, supplier engagement, HR and recruitment, and training and communications.

## Risk Framework

To better integrate modern slavery risk management across our operations, we reviewed our risk assessment matrix and included a social impact category which focuses on human rights and labour rights into our enterprise risk framework. We also identified and implemented a dedicated tool for capturing modern slavery risk data.

## Supplier Risk Identification and Prioritisation

We reviewed and prioritised our highest spend suppliers against modern slavery risk indicators and identified five high-risk procurement categories (see Criterion 3 'Modern slavery risks in operations and supply chains' above). We have committed to undertaking further due diligence on 55 potentially high-risk Australian-based suppliers and a further five suppliers located in China and Thailand.

## Supplier Due Diligence

In 2020 we invited 22 of our highest risk AU (and NZ) suppliers to participate in a self-assessment questionnaire. Twenty suppliers (91%) completed the questionnaire and with the help of external consultants, we developed detailed risk-based reports for these suppliers which included improvement recommendations. We will continue to engage with them to implement identified corrective actions in 2021. Information on our self-assessment questionnaire is summarised in Case Study 2.

# Modern Slavery Roadmap

While our focus for year 1 was on reviewing existing systems and processes for managing operational and supply chain modern slavery risks, determining our highest risk/highest priority suppliers and building a modern slavery risk management framework, Year 2 will focus on implementing additional priority actions and enhancing our due diligence processes for our priority national and international suppliers across our six markets. Year 3 will focus on monitoring and reviewing progress as part of our commitment to continual improvement. Our three-year road map is included below.

## YEAR 1 (2020) Establish Framework

- Formalised Modern Slavery Working Group
- Developed a Modern Slavery Action Plan
- Developed and delivered staff awareness survey
- Engaged and educated SLT and Board
- Rolled out broad modern slavery staff awareness
- Undertook supplier risk prioritisation
- Engaged highest risk AU (and NZ) suppliers and invited 22 suppliers (50% high risk AU (and NZ) spend) to complete modern slavery SAQ
- Reviewed and updated risk framework to include modern slavery risk
- Reviewed and updated Supplier Code of Conduct

## YEAR 2 (2021) Expand due diligence program

- Follow-up supplier questionnaires with Corrective Action Plans
- Conduct further supplier due diligence of highest risk, highest priority suppliers (additional 38 suppliers)
- Communicate RPF's modern slavery position to all suppliers and recruitment/labour hire agencies
- Publish Supplier Code of Conduct on website
- Include KPIs and evaluation measures for suppliers as structured SRM program
- Implement program to ensure traceability back to source for high-risk goods

## YEAR 3 (2022) Review, Extend, Evaluate & Improve

- Extend supplier risk assessments to highest risk Tier 2 suppliers
- Conduct ongoing assessment of internal and external stakeholder awareness
- Review and update action plan and strive for continuous improvement
- Develop comprehensive modern slavery grievance and remediation program
- Review worker feedback data collection opportunities
- Continue to review and report on modern slavery risk management initiatives

# Case Study 1: Engaging and educating our staff on modern slavery

Engaging and educating our people is an important component of our Modern Slavery Action Plan. In 2020, we aimed to raise awareness of the issue to lift its profile across RPF and draw attention of its relevance to our business. A survey of 52 staff assessed current levels of awareness on modern slavery and informed content and delivery options of our **staff engagement and awareness program**.

We will use this initial training program to inform a more comprehensive professional development program including eLearning modules for staff on managing modern slavery risk in 2021.

## Key elements of our internal awareness program include:



**Briefing sessions with the Board of Directors and Senior Leadership Team on the implications of modern slavery to our business and the potential risks in our supply chain**



**Modern slavery information and Fact Sheet on staff intranet site**



**Developing a Modern Slavery Awareness Training video for access by all staff**



# Case Study 2: Engaging our highest priority suppliers

We invited our 22 highest risk AU (and NZ) suppliers (who collectively account for 50% of our high-risk procurement spend) to participate in a modern slavery supplier survey. Working closely with external consultants, our Procurement Category Managers (PCMs) engaged and educated each supplier not only on what we wanted them to do, but importantly why we wished to partner with them to assess and address our supply chains risks. Suppliers were provided with access to a supplier portal which included an information video, FAQs and a guideline to help them understand the intent of each survey question and the type of supporting information we required.

Twenty of the 22 suppliers completed the questionnaire. While all suppliers are based in AU (and NZ), they operate in a broad geographic area including North and South America, the Caribbean, Europe, Africa, and the Pacific Islands.

A mix of goods and services are procured from the 20 suppliers, including:

- Meat, poultry, seafood, agricultural products and other ingredients such as hydrocolloids
- Packaging including films, fibre and metal packaging
- Other goods and services such as finished goods, transport, warehousing and logistics, plant and equipment, maintenance services, ICT hardware and software, building and construction, labour hire and financial services.

Suppliers were assessed across three key areas – operations, workforce & remedy; governance & due diligence; and risk management. They were given an effectiveness ranking that reflects RPF's internal risk framework. Based on the effectiveness scores, suppliers were given a risk ranking. Lack of evidence and supporting

documentation resulted in lower effectiveness scores and higher overall risk ranking.

The lowest effectiveness ratings were in the Risk Management category with 55% of participating suppliers ranked as 'ineffective'. This reflects a lack of supplier due diligence processes and limited number of risk assessments undertaken by our suppliers of their supply chains (or even their Tier 1 suppliers). Despite this, many of our suppliers believed that they did not procure from high-risk suppliers.

Each of the participating suppliers was provided with a comprehensive risk-based report and improvement recommendations. Our PCMs are working with suppliers to develop and implement Corrective Action Plans based on the recommendations made.

**The lowest effectiveness ratings were in the Risk Management category with 55% of participating suppliers ranked as 'ineffective'.**

# Reporting Criteria 5: Effectiveness Assessment

The measures taken to date establish a continuous improvement process to develop internal capabilities and iteratively improve our systems and processes.

To track our journey to manage modern slavery risk we are implementing a review process to ensure we are making tangible progress towards achieving our goals and actions.

## Annual Review

### Board

**Our annual Modern Slavery Statement is approved and signed off by the Board as per mandatory reporting requirements.**

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## Quarterly Review

### Risk & Sustainability Committee

**Action Plan progress, issues and achievements are reviewed by the Risk and Sustainability Committee quarterly as part of the compliance update.**

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## Monthly Review

### Working Group and ELT

**Modern Slavery progress is reviewed by our Working Group members and our ELT monthly, and issues addressed collaboratively across relevant areas of the business.**

# Reporting Criteria 5: Effectiveness Assessment

## Effectiveness Indicators 2020

For 2020, we developed a set of process indicators to track the implementation of our modern slavery risk management program. These are included on the right

## Continuous improvement

Addressing modern slavery risk is complex and challenging. In 2020 we made significant progress in understanding our operational and supply chain risks, engaging our staff and management team globally and documenting our modern slavery action plan and road map.

Our Modern Slavery Working Group led by our Modern Slavery Compliance Officer and supported by our Board's Risk & Sustainability Committee, will strive for continuous improvement as we continue to integrate modern slavery risk management into all aspects of our operations and purchasing decisions.

We expect our approach to evolve over time as we and the business community learn more about the risks and impacts of modern slavery globally.

Indicator or Target	In progress	Completed
Formalise Modern Slavery Working Group and Terms of Reference by 30 July 2020		✓
Engage and update Board, and SLT on modern slavery broadly and legislative reporting requirements by 30 August 2020		✓
Complete modern slavery gap analysis by 30 September 2020		✓
Complete all necessary training for procurement/buying teams by 30 June 2020		✓
Complete a review and risk prioritisation of all Tier 1 suppliers by 30 August 2020		✓
Develop a system for supply chain and supplier verification by 1 October 2020		✓
Complete Modern Slavery Action Plan and Road Map by 30 November 2020		✓
Incorporate modern slavery into enterprise risk management framework by 31 December 2020	✓	
Include modern slavery performance standards and contract evaluation criteria for identified high risk contracts in tender/procurement processes by 31 December 2020	✓	
Finalise and distribute Supplier Code of Conduct by 31 December 2020	✓	
Engage highest risk AU (and NZ) suppliers (comprising 50% of AU (and NZ) spend) in modern slavery SAQ by 31 December 2020		✓
Implement and track implementation of corrective action plans by all high-risk suppliers	✓	

# Reporting Criteria 6: Process of consultation with entities owned or controlled

All entities under the control of RPF operate under a common and consistent governance framework that raises awareness and embeds a consistent approach to addressing modern slavery risks in its operations and supply chains. All entities share the same executive leadership team, who have consulted in and contributed to the drafting of this Statement.

Topco Investments Australia Pty Ltd

RPF CBid Co Pty Ltd

VIP Topco Pty Limited

VIP Midco Pty Limited

VIP Mezzco Pty Limited

VIP Holdco Pty Limited

VIP Bidco Pty Limited

Real Pet Food Company Pty Ltd

Kanguru Holdings Pty Ltd

Game Meat Processing Pty Ltd

GMP Employment Pty Ltd

GMP Leasing Pty Ltd

Kanguru Asset Management Pty Ltd

KMEC Pty Ltd

KOEC Pty Ltd

Petfood Holdings Pty Ltd

APB Employment Pty Ltd

APB Leasing Pty Ltd

Australian Pet Brands Pty Ltd

Fresh Pet Food Investments Pty Ltd

Pet's Tucker Time Pty Ltd

Pet Care Australia (Pty) Ltd

Petfood (IP) Pty Ltd

Petfood Asset Management Pty Ltd

Petfood Leasing Pty Ltd

Petfood Leasing Pty Ltd

Scotty's Natural Pet Foods Pty Ltd

VIP Dog Training Pty Ltd

VIP Petfoods (Vic) Pty Ltd

VIP Petfoods Employment Pty Ltd

VIP Petfoods Leasing Pty Ltd

VMEC Pty Ltd

VIP Petfoods (Aust.) Pty Ltd

Consolidated Manufacturing Enterprise Pty Ltd

Vet's Best Products Pty Ltd

VIP Nominees Pty Limited

Vetco Australia Pty Limited

Swanbrook Road Holding Trust