



Our purpose is to make  
our world a happier  
place through the love  
of pets.

**GREENCROSS GROUP  
JOINT MODERN SLAVERY STATEMENT  
FY24**

**5TH REPORTING STATEMENT**

'QUARTER ONE' LEVEL 2, 1 EPPING ROAD, NORTH RYDE NSW 2113

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## FY24 GREENCROSS GROUP JOINT MODERN SLAVERY STATEMENT

The Greencross Group is proud to release its fifth joint modern slavery statement. This modern slavery statement addresses the mandatory reporting criteria prescribed under the *Modern Slavery Act 2018* (Cth) and covers the reporting period of 1 July 2023 to 30 June 2024 (FY24).

The Greencross Group's core values of being passionate, authentic, caring, knowledgeable, and working with a sense of togetherness, continued to guide our interactions with our suppliers. Together with our suppliers, we learned more about identifying, assessing and addressing the risks of modern slavery practices across our operations and supply chains.

This statement shows our ongoing commitment to assessing and addressing the risks of modern slavery practices as they relate to our business in Australia.

## Section 1: Greencross Reporting Entities

Vermont Aus HoldCo Pty Limited submits this joint modern slavery statement on behalf of itself and each entity listed in Appendix 1 (each, a **Greencross Reporting Entity**).

## Section 2: Our structure, operations and supply chains

Vermont Aus HoldCo Pty Limited is the ultimate holding company for each Greencross Reporting Entity, and collectively they own or control a number of other entities comprising the Greencross Group.

The Greencross Group is the largest integrated pet wellness business in Australia and New Zealand. We employ around 7,000 people across our retail stores, veterinary clinics and hospitals, related veterinary and animal services, our warehousing and distribution centres, and our corporate support office in Australia.

The Greencross Group operates over 280 retail stores across Australia and New Zealand. Goods available for resale to consumers at these stores include pet food, pet bedding, pet housing, pet toys, pet accessories, pet grooming products, and flea, tick and worm products. Most of these goods can also be purchased online from our websites [www.petbarn.com.au](http://www.petbarn.com.au) and [www.animates.co.nz](http://www.animates.co.nz). In addition to offering third party brands, we also offer a number of our own private label goods for resale to consumers. A number of our retail stores offer pet services such as grooming, puppy and kitten school, and pet adoption.

We operate around 165 general veterinary practice clinics across Australia and New Zealand, and around 30 specialist and emergency veterinary hospitals in Australia. Some of our veterinary clinics in Australia are co-located with, or next to, our Petbarn retail stores, providing convenience and integrated pet wellness services to our customers and clients. We offer web based veterinary services and also provide veterinary pathology and pet cremation.

During FY24, our wholesale operations in Australia ceased servicing the external market and shifted its focus to servicing and supplying goods to its own well-known Australian brands including Petbarn, Greencross Vets, and other clinics and hospitals within its Animal Referral and Emergency Network.

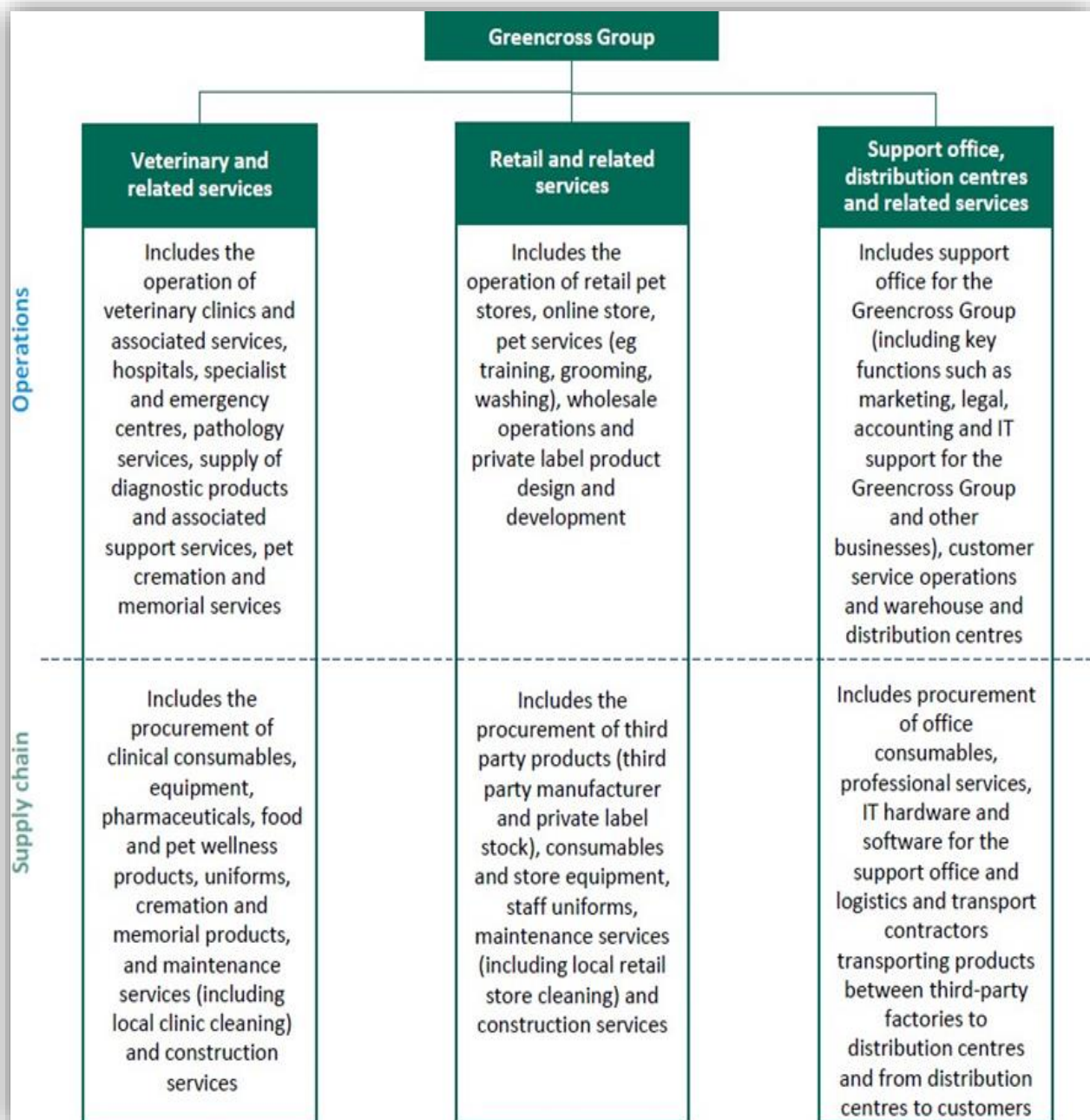
# Greencross Pet Wellness Company

The Greencross Group conducts business under various brands, with our most well-known and trusted brands in Australia being Petbarn and Greencross Vets. The key brands across the Greencross Group include:





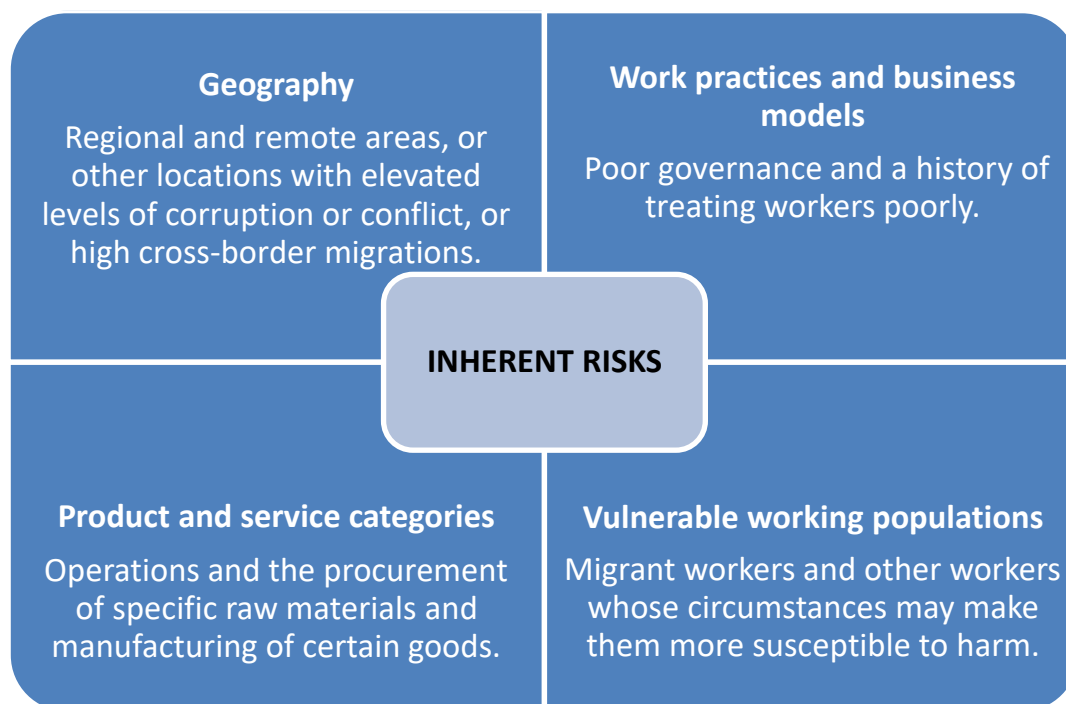
An extensive network of suppliers is required for us to carry out our pet wellness business. The structure of our operations and supply chains is outlined in the below diagram and, with the exception of our wholesale operations, has remained largely unchanged since FY23.



## Section 3: Risks of modern slavery practices in our operations and supply chains

Our extensive operations and supply chains means that we have suppliers operating out of different regions across the globe. Some are based in Australia, while others are based in, and operate out of various regions in Asia, Europe, North America, South America and the Pacific.

Given the nature of our business, we appreciate that there are inherent risks of modern slavery practices in our operations and supply chains. The inherent risks of modern slavery practices in our operations and supply chains predominantly arise due to the nature of the goods being supplied and/or manufactured for retail business, and the geographical location of these supply chains and operations for those goods. We again acknowledge that modern slavery practices are by no means restricted to certain industries or geographical locations and can occur in any industry throughout the world, including Australia. Inherent modern slavery risk factors include:



## Section 4: Assessing and addressing the risks of modern slavery practices in our operations and supply chains, including due diligence and remediation processes in FY24

To assess and address the risks of modern slavery practices in our operations and supply chains, our actions in FY24 continue to be guided by the 'Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities' published by the Commonwealth Government, together with the assistance of external consultants. Our supply chains and operations as they relate to our business in Australia can be categorised into four areas:

1. goods for resale;
2. facilities management;
3. veterinary consumables; and
4. goods not for resale.

Generally recognised risk factors of modern slavery practices were identified across these four areas and in FY24, our efforts remained on assessing and addressing the risks of modern slavery practices across our suppliers of goods for resale. In this statement, these suppliers are referred to as our suppliers of **Retail Goods for Resale**. We also continued our risk assessment across facilities management, veterinary consumables and goods not for resale, and which for the purpose of this statement, are referred to as our suppliers of **Services and Goods Not for Resale**.

Our main achievements are outlined below:

### Retail Goods for Resale

1. Completed residual risk assessments of all existing suppliers of Retail Goods for Resale.
2. Created and issued corrective action plans to any supplier of Retail Goods for Resale if their residual risk assessment identified the need for any corrective action.
3. Established the baseline to measure the performance and improvements in modern slavery practices across our Retail Goods for Resale over time.
4. Onboarded and completed inherent and residual risk assessment of all new suppliers of Retail Goods for Resale.
5. Integrated the risk assessment status of suppliers of Retail Goods for Resale into our new contract management system.
6. Delivered modern slavery training sessions (as they relate to suppliers of Retail Goods for Resale) to employees across our Retail Category and Private Label teams, Group Procurement, Supply Chain, and Legal team in December 2023 and May 2024.



## Services and Goods Not for Resale

1. Conducted extensive data cleansing and validation processes of suppliers of Services and Goods Not for Resale to properly identify suppliers that meet the required threshold for assessment.
2. Introduced enhanced provisions around modern slavery risk practices into the tendering process for suppliers of Services and Goods Not for Resale.
3. Incorporated provisions into our new contract management system to record any relevant modern slavery risk assessment carried out on suppliers of Services and Goods Not for Resale.
4. Conducted multiple training sessions to key stakeholders across the business to increase their awareness of modern slavery and its associated risks. Additionally, Group Procurement provided support and guidance to both new and existing suppliers of Services and Goods Not for Resale to ensure alignment with our obligations under the Modern Slavery Act.
5. Completed the inherent risk assessment for all suppliers of Services and Goods Not for Resale above the required threshold for assessment.
6. Issued Self-Assessment Questionnaires to priority suppliers of Services and Goods Not for Resale.

The above achievements are outlined in further detail below.

## Risk assessment process: Retail Goods for Resale

We continued our membership and working relationship with a respected global ethical trade organisation. We maintained our on-going engagement with our suppliers of Retail Goods for Resale and further developed our own assessments and monitoring of possible modern slavery practices across this supplier base.

Throughout FY24, we continually engaged with our existing suppliers of Retail Goods for Resale and offered these suppliers education sessions to assist their understanding of modern slavery. Such engagement also gave certain suppliers a clearer understanding of what is required from us in terms of documentation and actions required to complete any residual risk assessment of modern slavery practices. Moreover, this engagement enhanced the reliability of the overall results across the residual risk assessments of these suppliers. After these residual risks assessments, we created and issued corrective action plans and we continued to work with these suppliers in addressing the corrective actions.

Our Retail Goods for Resale supplier risk assessment tool which had been implemented and used in previous years was further developed. In FY24, the risk assessment tool included:

- a revised guide to assist key stakeholders in using and implementing the tool;
- a risk assessment of suppliers, primarily focussed on potential risks associated with vulnerable populations, high-risk geographies, and high-risk products, with a more robust and standardised approach to weighting across these inherent risks;

- a supplier self-assessment questionnaire to assess the working conditions and location of the manufacturing site(s) used by that supplier and their outsourcing or contracting arrangements, as well as input from each supplier around their own processes relating to modern slavery and/or employment generally; and
- a suite of reporting measures for ongoing suppliers of Retail Goods for Resale, to more efficiently track and report on key improvements over time.

## Risk assessment process: Services and Goods Not for Resale

Inherent risk assessments of modern slavery risk practices continued to be rolled out to most suppliers of Services and Goods Not for Resale that met our threshold for assessment. With the assistance of internal key stakeholders, systematic improvements were made around identifying suppliers that fell into this category.

## Training

Our modern slavery training sessions delivered to our Retail Category and Private Label teams, Group Procurement, Supply Chain and our Legal team, in December 2023 and June 2024. Like FY23, training around our modern slavery risk assessment tools and processes was centred around our suppliers of Retail Goods for Resale.

Guidance around our risk assessment processes as they relate to suppliers of Retail Goods for Resale was provided to our Retail Category and Private Label teams as required throughout FY24. Assistance was also provided to different business units as they pertain to our assessment processes of suppliers of Services and Goods Not for Resale.

## Due diligence and remediation processes

Due diligence and remediation processes were addressed on an ongoing basis throughout FY24 by the Modern Slavery Working Group under the direction of the Modern Slavery Steering Committee. The Modern Slavery Working Group scheduled weekly meetings throughout FY24 and used these meetings as a means to provide approval or remediation guidelines (as applicable) around onboarding new suppliers of Retail Goods for Resale. These meetings were also used as a forum to discuss and resolve issues identified by key stakeholders and to track progress and monitor our modern slavery risks.

The Modern Slavery Steering Committee met throughout FY24 to monitor the progress and effectiveness of actions implemented to assess and address the risk of modern slavery practices in our supply chains and operations. Similarly to previous years, the Modern Slavery Steering Committee maintained responsibility for directing key decisions around managing these risks for our Australian business.

Members of the Modern Slavery Working Group and the Modern Slavery Steering Committee include Group Procurement, Legal, Property, Retail, Vet and Supply Chain, as well as members of our Executive Leadership Team who have responsibilities that apply across our Australian business.

## Section 5: Assessing the effectiveness of our actions

The Modern Slavery Working Group and Modern Slavery Steering Committee performed ongoing reviews throughout FY24 to evaluate the effectiveness of the actions taken to assess and address the risks of modern slavery practices across our operations and supply chains as they apply to our Australian business.

The main assessments and improvements from these reviews across this supplier base are detailed below:

### Assessment and Improvements - Retail Goods for Resale

- The modern slavery tracker and dashboard that was implemented in previous years was further developed and continued to facilitate our internal tracking and reporting across our suppliers of Retail Goods for Resale. The system:
  - a) established baseline measurements for each supplier of Retail Goods for Resale so that their progress can be more readily identified from one year to the next.
  - b) provides a summary of assessments and remediations (if applicable) undertaken with, or by, said suppliers; and
  - c) continued to allow key stakeholders to engage with these suppliers to identify practical actions to reduce our risk assessment of them as a supplier of Retail Goods for Resale, ensuring positive outcomes for us and these suppliers.

### Assessment and Improvements - Services and Goods Not for Resale

- We continued to work with suppliers of Services and Goods Not for Resale and where required, directed them to free and available practical modern slavery resource guides and tools which helped further their understanding of the risks of modern slavery.
- Our extensive data analyses established a more accurate baseline of suppliers of Services and Goods Not for Resale that need to be assessed.

## Section 6: Our consultation process

The Greencross Reporting Entities, and the entities which the Greencross Reporting Entities own and control, have been consulted and involved in our approach to modern slavery related due diligence. The Greencross Group's Executive Leadership Team, some of whom are members of the Modern Slavery Steering Committee, have group-wide responsibilities across the Greencross Group.

This joint modern slavery statement was submitted to the Modern Slavery Steering Committee for consultation before it was put to the Board of Vermont Aust HoldCo Pty Limited for review and approval.

This joint modern slavery statement was approved by the Board of Vermont Aus HoldCo Pty Limited on 1<sup>st</sup> October 2024. The Board of Vermont Aus HoldCo Pty Limited approved this joint modern slavery statement on behalf of each Greencross Reporting Entity.



**George Wahby**  
CEO & Managing Director



## APPENDIX 1 – GREENCROSS REPORTING ENTITIES

No.	Greencross Reporting Entities	Australian Company Number (ACN)
1.	Vermont Aus Holdco Pty Ltd	ACN 626 842 135
2.	Vermont Aus Midco Pty Ltd	ACN 630 204 572
3.	Vermont Aus Pty Ltd	ACN 626 845 510
4.	Greencross Pty Ltd	ACN 119 778 862
5.	Greencross Operations Pty Ltd	ACN 130 686 743
6.	Mammoth Pet Holdings Pty Ltd	ACN 146 505 848
7.	Mammoth Pet Pty Ltd	ACN 116 248 849
8.	Petbarn Pty Ltd	ACN 001 802 759
9.	Greencross NSW Pty Ltd	ACN 133 433 833