



Modern Slavery Statement

2023



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.

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Introduction

Millell Pty Ltd (ABN 17 148 151 213), trading as Pet Circle, is a privately held Australian online retail company. We sell our range of Pet Circle pet products and third party pet products in Australia through an online eCommerce experience, and partner with third parties who supply and manufacture our products from Australia and New Zealand, Europe, Asia and America.

Pet Circle is committed to operating ethically, transparently, responsibly, and sustainably and to taking all reasonable steps to ensure there is no form of modern slavery within our own operations and our supply chains.

While we seek to partner only with third parties who share this commitment, we recognise that there remains an inherent risk of modern slavery in our supply chain.



Modern Slavery

Pet Circle acknowledges that modern slavery is a global issue existing across all businesses, especially those with international trade. As such, modern slavery can take many forms including threats, coercion, and exploitation resulting in human trafficking, forced labour, peonage and child labour. Given the complexity of global supply chains, Pet Circle recognises the importance of doing everything in our power to uncover and eliminate these practices from our supply chain.

Reporting Period

This Modern Slavery Statement outlines the risks across our business and details the actions we have taken during the reporting period ended 30 June 2023 and our assessment of the efficacy of those actions.

Our Business

Pet Circle is Australia's leading online pet retailer. We proudly design, sell and distribute an extensive range of pet products across the food and treats, toys, accessories and health and medication categories. First incorporated in January 2011, we are driven by our mission to give all pet families access to the best pet care possible and also feel incredibly passionate about affording those same opportunities to the animal charity organisations we partner with.





Our Structure & Operations

Pet Circle's headquarters is located in Sydney, New South Wales, Australia, supported by three owned and operated fulfilment centres located in New South Wales, Queensland and Western Australia, and a third party logistics centre operating in Victoria.



Our People

In Australia, Pet Circle employs or engages approximately 650 people including permanent employees, casual employees and contractors throughout all four sites across the following business areas; Marketing, Supply Chain & Operations; Logistics, Fulfilment, Technology, Finance, People & Culture, Merchandising, Customer Experience, Data & Analytics, Product, and Veterinary support.

Additionally, we employ or engage approximately 80 people in the Philippines across the following business areas; Finance, Customer Service, Marketing, Merchandising and Technology. We also have a small team of eight professionals in New Zealand.

Pet Circle's company-owned operations (our warehouses and delivery fleet) are located in Australia and focus on ensuring quality products are fulfilled safely, ethically and efficiently. We maintain above award pay rates and fair working conditions; offering a safe and inclusive working environment.

Our Supply Chain

Broadly, Pet Circle's supply chain can be broken down into four categories:

1. Trade suppliers of pet products (e.g. the third party brands we sell);
2. Trade suppliers of Pet Circle branded products (e.g. the third parties who manufacture our private label products);
3. Indirect trade suppliers engaged by trade suppliers in the manufacturing or supply of the goods (e.g. parts production, packaging and shipping); and
4. Suppliers of non-trade goods (e.g. labour hire businesses, couriers, suppliers of end product packaging, waste management, warehouse cleaning, professional services etc).

Given our reliance on these third parties, particularly our trade suppliers, we acknowledge the risk of modern slavery within our supply chains.





Risk of Modern Slavery

Risk of Modern Slavery within our own Operations

As noted above, we employ or engage staff in Australia, the Philippines and New Zealand. We confirm the eligibility of our people to work as part of our recruitment and onboarding processes.

Our professional and managerial staff are employed pursuant to employment agreements setting out our expectations for the performance of their roles, their remuneration and other entitlements. For those employees governed by an industry modern award (Award), we regularly review the relevant Awards to ensure we pay at or above the minimum pay rates outlined in the Award and comply with all other Award requirements relating to classification and other entitlements.

Pet Circle has implemented a number of processes and policies to mitigate the risk of modern slavery as well as encourage and empower its personnel. Further information on these processes and policies can be found under the “Our Governance” section below.

Risk of Modern Slavery within our Supply Chain

TRADE SUPPLIERS OF PET PRODUCTS

We currently source products from approximately 179 suppliers originating from a number of countries including Australia, New Zealand, United States of America, China, Taiwan, Vietnam, Malaysia and across Europe. We acknowledge that, based on globally accepted risk indices such as the Global Slavery Index, some of these countries have a heightened risk of modern slavery. In the next reporting period, we intend to develop processes to assess our current and potential trade suppliers operating in high-risk areas, including through the implementation of our Supplier Code of Conduct.

The following international and local brands stocked by Pet Circle have confirmed their commitment to identifying and addressing the risk of modern slavery throughout their supply chains.

- Mars brands including Whiskas and Pedigree
- Nestle brands including Purina, Supercoat, Fancy Feast and Pro Plan
- Royal Canin
- Colgate-Palmolive brands including Hill's and Hill's Science Diet
- Masterpet brands including BlackHawk
- Bayer and Elanco
- Openfarm



Risk of Modern Slavery within our Supply Chain

TRADE SUPPLIERS OF PET CIRCLE BRANDED PRODUCTS

The internationally and locally sourced products branded by Pet Circle are referred to in this statement as our “private label brands”. The manufacturers of our private label brands are based in Australia, Thailand, Malaysia and China. In the next reporting period, we intend to develop a set of minimum standards against which to assess the performance of our current and potential new private label manufacturers, which will include seeking declarations in relation to employment terms and working conditions.

INDIRECT TRADE SUPPLIERS

Pet Circle acknowledges that the risk of modern slavery extends beyond Pet Circle’s trade suppliers to its indirect trade suppliers, including the individuals involved in the production of parts, final assembly and the transport of goods to Australia. Whilst Pet Circle does not hold direct trading relationships with these suppliers, they are an important part of our extended supply chain. In the next reporting period, Pet Circle intends to request that its direct trade suppliers share information on their modern slavery risk assessments of their own direct supply chain.

SUPPLIERS OF NON-TRADE GOODS

For transport of goods within Australia, Pet Circle relies either on its own employee drivers or on the dedicated subcontractors engaged by our contracted third party logistics providers. For other providers of services and of non-trade goods, Pet Circle intends to implement its Supplier Code of Conduct.



Our Supply Chain Risks

In the previous section, we outlined how Pet Circle has assessed modern slavery risk in its supply chain by supplier tier or category. As part of the assessment of our modern slavery risk more generally, we have identified the following key areas of our operations that give rise to heightened risk of modern slavery:

- Supplier due diligence and transparency;
- Geographic location; and
- Sector

SUPPLIER DUE DILIGENCE AND TRANSPARENCY

As noted above, Pet Circle relies on its business partners to be transparent in the reporting of their own labour practices to help mitigate the risk of modern slavery in our supply chain, including in relation to worker practices such as employee pay structure, working hours, and labour conditions.

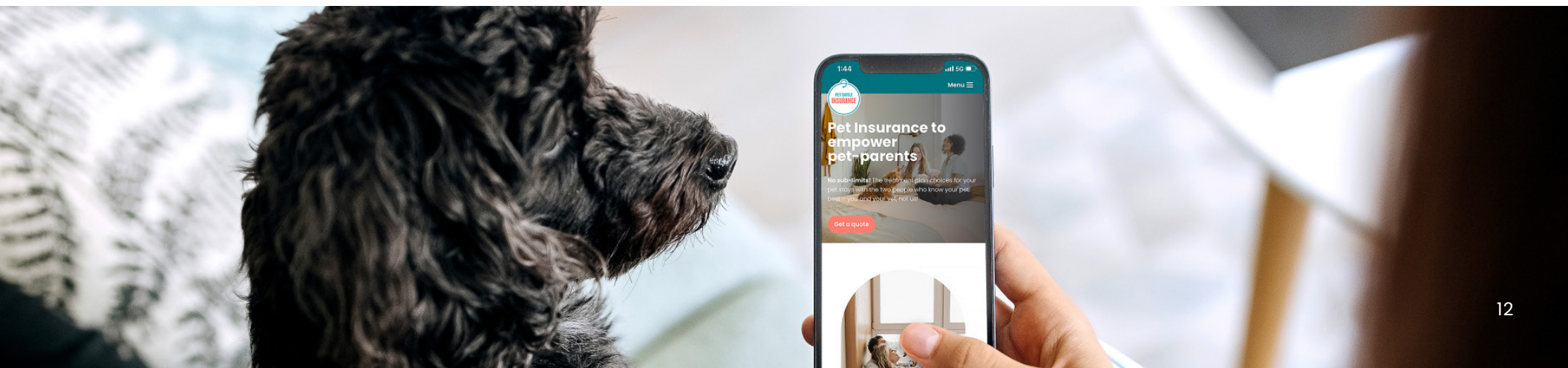
GEOGRAPHIC LOCATIONS

Pet Circle recognises that certain locations carry a higher risk of modern slavery practices due to higher levels of corruption or conflict or socio-economic factors. This includes countries with higher migration rates which may have an increased risk of modern slavery practices such as peonage.

SECTOR

Pet Circle's supply chain operations and service offerings have expanded since our first Modern Slavery Statement to include a partnership offering Pet Insurance, the launch of our own fleet in Western Australia, online veterinary advice via our website, and the expansion of our range of private label products to include a number of different categories including food, treats, toys, bedding and cat trees/scratchers.

Unfortunately some business sectors are more susceptible to corruption and modern slavery including sourcing, manufacturing, warehousing and logistics.



Our Governance

We have the following policies and procedures in place 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 operation:

- Modern Slavery Policy
- Supplier Compliance Declaration
- Whistleblower Policy
- Equal Employment Opportunity Policy
- Code of Conduct
- Harassment / Bullying Policy
- Sexual Harassment Policy
- Grievance Resolution Procedure

Due to the human resources policies, governance and controls within our own operations – including our offices and fulfillment centres – there is a low risk of an incidence of child labour or any form of forced labour within our local operations.

In line with the risks identified in our supply chain Pet Circle is committed to implementing the following processes during the next reporting period to mitigate these risks of modern slavery;

- Implementation of Supplier Code of Conduct for onboarding new suppliers

- Assess existing Suppliers against Supplier Code of Conduct
- Implementation of Supplier Declaration as part of the onboarding process and review of existing suppliers
- Review Private Label Suppliers
- Require suppliers to undertake risk assessments of their own supply chain
- Consider whether any modern slavery risk assessments or audits for new or existing Suppliers are publicly available or may be shared between customers or industry members





Identified Concerns and Remediation

We actively encourage the reporting of any suspected or known unethical, illegal, fraudulent or undesirable conduct within our own operations and supply chains including reporting by our supply and logistics partners, under our Whistleblower Policy. This includes any potential modern slavery risks or other acts which may adversely impact persons or the environment.

Assessing the Effectiveness of our Actions

In 2023 Pet Circle engaged a third party consultancy, Impact Advisory, to produce a strategic framework for sustainability across the business including by supporting the business to develop and implement environmental, social and governance initiatives.

Pet Circle is committed to the ongoing assessment of the effectiveness of our actions to ensure we are continuing to strengthen our response to modern slavery risks across the entirety of our supply chain. This involves regular reviews of our risk assessment process and ensuring engagement and transparent dialogue with our partners on the topic.



Consultation

This Modern Slavery Statement has been prepared with the consultation of the relevant internal stakeholders and key management across our supply chain and operations team for the businesses that we operate and control.

This statement was approved by the Board of Directors of Millell Pty Ltd (trading as 'Pet Circle') in its capacity as the principal governing body on 19 January 2024.

This statement was signed and approved by

A handwritten signature in black ink, appearing to be 'M Frizell', written in a cursive style.

MICHAEL FRIZELL
Chief Executive Officer and Director
of Millell Pty Ltd on 19 January 2024



**PET
BETTER**

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