# Prime100 Modern Slavery Statement

## Financial Year ending 31 December 2025

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# Introduction

This modern slavery statement (**Statement**) is made by Prime100 Pty Ltd (ABN 75 166 483 021) (**Prime100**) as the reporting entity for the purposes of the *Modern Slavery Act 2018* (Cth) (**Act**) in respect of the financial year ending 31 December 2025 (**Reporting Period**).

This is Prime100's first modern slavery statement under the Act. This Statement outlines the approach taken by Prime100 and its wholly-owned subsidiary, Prime100 LLC, to establishing and ensuring robust frameworks and processes are in place to identify, assess and address modern slavery risks within its operations and supply chains. Unless otherwise stated, references to "Prime100 Group", "the Group", "we," "our" or "us" refer to Prime100 and Prime100 LLC collectively.

Prime100 is committed to operating responsibly and with integrity across all aspects of our business, including our approach to modern slavery risks. We recognise that addressing modern slavery risks is an ongoing process. While we have made progress during the Reporting Period, we also acknowledge that our approach is still developing and we remain committed to continuous improvement.

# Structure, operations and supply chains

**Structure**

Established in 2013, Prime100 is an Australian-based manufacturer of premium pet food products, incorporated in Victoria with its principal place of business in Derrimut, Victoria.

In 2023, Prime100 incorporated a new entity in Delaware, United States of America, Prime100 LLC, to support entry into the United States market, with operations conducted through a third-party manufacturer and a third-party distributor on the East Coast of the United States of America. During the Reporting Period, Prime100 controlled Prime100 LLC as its wholly-owned United States subsidiary.

In May 2025, Prime100 was acquired by the Colgate-Palmolive group and, from that time, formed part of the wider Colgate-Palmolive corporate group. Due to the timing of this acquisition, Prime100 was not fully integrated into the Colgate-Palmolive group's modern slavery risk management framework during the Reporting Period. Prime100 is working towards a full integration into Colgate-Palmolive's framework as soon as practicable, including alignment of modern slavery risk management processes.

**Operations**

Prime100 manufactures products for sale in Australia under three core brands: Prime100 SPD, Prime100 and Prime Pantry. Products manufactured under each brand are made in Australia and supplied to veterinary clinics, pet specialty stores and major supermarkets across Australia.

Prime100's operations in Australia include:

- procurement of ingredients and packaging used in its products;
- manufacturing and processing of pet food products;
- distribution of finished products to retailers, veterinary clinics and other business customers; and
- product development activities related to formulation and production.

Operations in Australia are conducted from two facilities in Derrimut, Victoria, which incorporate manufacturing, warehousing and administrative functions.

In the United States, Prime100 LLC does not own manufacturing facilities and instead operates through contractual arrangements with a third-party manufacturer based in Woodbridge, New Jersey and third-party distributors.

During the Reporting Period, the Prime100 Group sold approximately 14,614,600 units of product in Australia and approximately 129,503 units of product in the United States. The scale of these operations highlights the importance of effective oversight of the Group's manufacturing processes and supply chain relationships, including its third-party manufacturing and distribution arrangements.

Prime100 employs approximately 197 personnel in Australia, including employees and labour hire contractors. This team includes plant engineers and fitting personnel, a research and development manager and food technologist, a quality manager with a team of food scientists and quality control officers, a procurement manager, a production planner, a logistics manager and processing team, a team of customer care officers, an operations manager, shift production managers, team leaders and general operators, a team of key account managers, sales representatives and sales analysts, as well as a marketing team, consumer affairs specialist, human resources department and a team of financial analysts.

Prime100 LLC does not have any direct employees. Its United States operations are supported by 4 contractors engaged through a labour hire services provider.

**Supply chains**

The Prime100 Group's supply chain comprises a range of inputs and services that support its operations, including:

- ingredients and other direct materials used in pet food production;
- packaging materials;
- warehousing, logistics and distribution services;
- labour hire services; and
- other professional and operational services.

The Prime100 Group's supply chains include both direct suppliers and indirect upstream suppliers. The Group generally has the greatest visibility over its direct contractual counterparties and currently has less visibility over upstream tiers involved in the extraction, production, processing and transportation of ingredients, packaging components and other manufacturing inputs.

*Australian operations*

Prime100's operations in Australia are supported by approximately 300 suppliers and service providers, around 60 of which supply ingredients and other direct materials, accounting for a significant portion of the total procurement spend.

The majority of ingredients used in Prime100's pet food products are sourced domestically within Australia, with fresh, frozen and dry ingredients, as well as packaging, predominantly purchased from Australian suppliers.

Where required, Prime100 also sources certain ingredients and packaging from overseas markets where these are not available or cannot be reliably sourced within Australia. This is discussed in further detail below.

Prime100 formulates and manufactures its products at its Australian facilities by processing these ingredients into a range of pet food formats, including chilled rolls, slow-cooked tetrapak products, air-dried and frozen products.

Finished products are then packaged in Australia in house and distributed to consumers and business customers, including retailers and distribution centres. Customer shipments are fulfilled from four third-party logistics provider sites located across Australia, which manage storage and distribution.

*US operations*

Prime100 LLC relies on third-parties for manufacturing and distribution. The Group provides product formulations and technical know-how to a third-party manufacturer in the United States, which produces finished pet food products on the Group's behalf.

Prime100 LLC then purchases these products from the manufacturer and sells them to a third-party distributor, which supplies products directly to business customers (including retailers and distribution centres) primarily across the East Coast of the United States. As a result, Prime100's US supply chain is characterised by a limited number of contractual relationships, rather than direct ownership or control of production facilities or transport assets.

The Prime100 Group recognises that the structure of its supply chain, including reliance on both domestic and international suppliers and third-party service providers, influences the nature and location of potential modern slavery risks, which are described below.

# Potential risks of modern slavery

The Prime100 Group recognises that modern slavery risks are risks of harm to people arising through its operations and supply chains.

In assessing these risks, the Prime100 Group has conducted internal review and considered operational, sector, product and geographic risk factors and has focused on identifying areas where workers may be exposed to harm, particularly in higher-risk environments and supply chain tiers where visibility and influence are more limited.

Prime100 Group has identified that relevant risk indicators may include the use of vulnerable workforces, reliance on third-party recruitment or labour providers, labour-intensive and lower-skilled operational activities, sourcing from higher-risk jurisdictions, complex multi-tier supply chains and reduced transparency beyond direct contractual counterparties.

Prime100 intends to give priority to areas where the potential severity of harm and vulnerability of affected workers may be greater, including in higher-risk sourcing locations and operational contexts where workers may be engaged in lower-skilled roles. The Prime100 Group recognises that these factors may increase the risk of harm to workers, including through exploitative recruitment practices, excessive working hours and other forms of labour exploitation.

These risk considerations have informed the Prime100 Group's approach to identifying and assessing potential areas of modern slavery risks within its operations and supply chains, as outlined below.

**How risk is identified and assessed**

During the Reporting Period, the assessment of risk specifically involved consideration of:

- supplier onboarding requirements;
- an internal review and development of a targeted supplier risk register (recording country of origin and modern slavery risk ratings for certain inputs and suppliers); and

- a questionnaire used for labour hire providers.

The Prime100 Group recognises that visibility is strongest at the level of direct suppliers and service providers and is more limited for upstream tiers, particularly where inputs are sourced internationally.

**Supplier risk register**

The Prime100 Group has developed a targeted supplier risk register to prioritise its approach to due diligence and supplier engagement.

Suppliers and service providers have been given an initial risk categorisation of low, medium or high-risk based on:

- geographical location; and
- the type of goods and services supplied to the Prime100 Group.

The countries of origin categorised as low-risk include: Belgium, Canada, France, Germany, Israel, Italy, Japan, the Netherlands, New Zealand, Poland, Serbia, Sweden and the United States.

Countries categorised as medium-risk include: Egypt, India, Malaysia, Mexico, Morocco, Peru, the Philippines, Sri Lanka, Turkey and Ukraine.

Countries categorised as high-risk include: China, Thailand and Vietnam.

Certain customer service and logistics providers in Australia have also been categorised as medium-risk due to the nature of the industry, despite their country of origin.

This initial assessment indicates that a majority of the Group's suppliers are low-risk. However, the Group recognises that modern slavery risks may still arise in both domestic and international supply chains.

When medium and high-risk suppliers are identified, the Prime100 Group makes enquiries as to whether such suppliers have a modern slavery policy or statement to further assess risk. Going forward, the Prime100 Group is committed to following up on the suppliers that do not have a modern slavery policy or statement to assess ongoing risk.

Prime100 Group acknowledges that further work is required to more comprehensively assess the risks posed by its existing supplier network.

**Key areas of risk**

The Prime100 Group has identified the following key areas of potential modern slavery risk within its operations and supply chains:

*Labour hire arrangements*

The Prime100 Group engages labour hire providers to support its production operations. The modern slavery risks associated with these arrangements may include exploitative recruitment practices, underpayment, debt bondage, restrictions on worker freedom of movement, retention of identity documents and other forms of coercion affecting vulnerable workers. These risks may arise because labour hire providers sit between the Prime100 Group and the workers performing roles in the Group's production environment.

*Overseas sourcing of ingredients and inputs*

The Prime100 Group sources certain ingredients and inputs from overseas where these cannot be sourced domestically. Prime100's risk categorisation process has identified a small number of medium or high-risk suppliers, including those sourced from higher-risk jurisdictions.

The relevant modern slavery risks in these supply chains may include forced labour, debt bondage, deceptive recruitment and exploitative labour practices in upstream processing, manufacturing, handling or transportation of imported inputs. These risks may be heightened where sourcing involves higher-risk jurisdictions or where Prime100 has limited visibility beyond its direct suppliers, particularly where there is potential for exploitative labour practices further upstream in the supply chain.

*Packaging and manufacturing inputs*

The Prime100 Group's supply chain includes packaging materials, some of which are sourced internationally.

Packaging and manufacturing input supply chains may present modern slavery risks because they can involve multi-tier manufacturing processes, offshore production environments and limited transparency in relation to the labour conditions applying to raw material extraction, processing and component manufacture.

Certain packaging inputs have been identified through the Prime100 Group's risk assessment process as presenting higher risk, depending on supplier characteristics and country of origin.

*Third-party manufacturing and distribution (United States)*

Prime100 LLC relies on third-party manufacturers and distributors in the United States.

The Group's exposure is primarily through being directly linked to risks arising in the operations of these parties, reflecting Prime100 LLC's reliance on contractual counterparties rather than direct ownership or management of manufacturing and distribution operations.

As a result, reliance on third-parties reduces direct oversight and may increase exposure to risks where suppliers do not have equivalent controls in place.

**Limitations**

The Prime100 Group acknowledges that:

- risk categorisation relies, in part, on supplier-provided information; and
- visibility is limited in respect of indirect suppliers and upstream supply chain tiers.

**Focus and future development of risk assessment**

The Prime100 Group has focused on ingredient, packaging and labour hire suppliers in relation to assessing modern slavery risks. The Group intends to expand its assessment to suppliers that import products and other indirect supply chain participants, where the risks of modern slavery might be higher, and is developing strategies to address these risks.

**Actions taken to assess and address potential risks**

The actions described below were implemented or in place during the Reporting Period, unless otherwise stated. Where planned enhancements are referred to, those matters are identified as future actions rather than actions completed during the Reporting Period.

The Prime100 Group's approach to addressing modern slavery risks involves embedding risk identification, due diligence and supplier engagement processes across its operations and supply chains. During the Reporting Period, the Group focused on building a framework to identify and assess risks at the supplier level, particularly in higher-risk categories such as labour hire, imported ingredients and packaging and third-party manufacturing arrangements.

These actions are directed towards improving supply chain visibility, engaging with suppliers and service providers to understand and address risks and integrating modern slavery considerations into procurement and operational processes. Consistent with the nature of the Group's risks, this approach places particular emphasis on supplier onboarding, targeted due diligence and ongoing engagement with higher-risk suppliers and labour providers, recognising that the Group's ability to influence outcomes will vary depending on the nature of its relationship with each supplier.

These processes operate as part of Prime100's developing due diligence framework, through which the Prime100 Group will strengthen its ability to identify, assess and respond to modern slavery risks and adopt appropriate controls over time.

**Setting supplier expectations and risk-based follow-up**

Up to 2024, all ingredient suppliers submitted a Supplier Application Form confirming their ethical behaviour. From 2024, new suppliers have submitted a revised Supplier Application Form which sets clear expectations that Prime100 will not do business with suppliers or manufacturers who do not comply with ethical labour standards, including the Ethical Trading Initiative Base Code and the *Modern Slavery Act 2018 (Cth)*. The Group has identified that this form could be improved and plans to update it to include an express supplier confirmation of compliance with the Ethical Trading Initiative Base Code and the *Modern Slavery Act 2018 (Cth)* and other targeted questions to assist the Prime100 Group's risk assessment prior to onboarding.

These onboarding requirements are used as an initial due diligence mechanism to communicate the Group's expectations, gather information relevant to modern slavery risk assessment and support decisions about whether additional follow-up is required in relation to particular suppliers.

In addition to the Supplier Application Forms, the Prime100 Group's commercial engagement with suppliers supports its ability to request further information relevant to modern slavery risk, including in circumstances where suppliers are assessed as presenting medium or high-level risk. In practice, this has involved seeking confirmation of supplier policies or statements and engaging with suppliers to clarify their risk profile.

While the Prime100 Group's contractual approach is continuing to develop, these engagement mechanisms provide a degree of practical leverage to enable further inquiry, assess supplier responses and inform decisions regarding ongoing supplier relationships where concerns are identified.

The Prime100 Group also applies onboarding requirements to labour hire providers (including the questionnaire-based due diligence described below).

**Labour hire due diligence**

To address risks associated with labour hire arrangements (as identified above), the Prime100 Group undertakes targeted due diligence using a structured questionnaire.

This questionnaire addresses key modern slavery risk indicators, including:

- right-to-work verification;
- age verification;
- provision of written contracts and payslips;
- compliance with workplace laws; and
- prohibitions on forced labour practices, including retention of identity documents or recruitment fees.

By requiring labour hire providers to respond to structured questions addressing key risk indicators, the Prime100 Group seeks to identify potential risk factors at an early stage, inform assessment of labour practices and support appropriate follow-up where concerns are identified. The Group intends to continue applying and refining this due diligence process as part of its ongoing efforts to mitigate modern slavery risks.

**Internal policy framework**

In March 2024, the Prime100 Group implemented an internal Modern Slavery and Minimum Labour Standards Policy, which outlines expectations for both the Prime100 Group's business operations and its suppliers.

The policy requires suppliers to comply with ethical labour standards and inform the Group of any breaches of those requirements.

Prime100 also plans to implement employee training to build awareness of modern slavery risks and obligations during the next reporting period. In addition, Prime100 intends to roll-out this policy to suppliers.

**Continuous improvement and working with Colgate-Palmolive**

Prime100 is working with Colgate-Palmolive's procurement team, which has significant experience in modern slavery risk management, to strengthen its approach to identifying and addressing risks. This includes more extensive training of staff, as well as exploring:

- supply chain mapping tools (including the SEDEX platform);
- data analytics; and
- other technology to improve visibility and monitoring of risks.

The Group recognises that its current approach is developing and intends to continue to enhance its systems and processes over time by leveraging the resources and expertise of Colgate-Palmolive.

**Remediation and escalation**

The Prime100 Group recognises that addressing modern slavery risks requires appropriate remediation processes.

During the Reporting Period, the Prime100 Group did not identify any such concerns. If concerns had been identified, the Prime100 Group would engage with relevant suppliers or providers to obtain further information, assess the nature and seriousness of the issue and consider appropriate next steps, including whether additional monitoring or engagement was required.

The Group recognises that these processes are still developing and intends to formalise them further.

**Measuring effectiveness of actions taken**

The Prime100 Group recognises that assessing effectiveness is an ongoing process.

The Modern Slavery and Minimum Labour Standards Policy was introduced in March 2024. As a result, the Group does not yet have a complete view of the effectiveness of its actions. However, the Prime100 Group is committed to assessing the effectiveness of its actions by monitoring the implementation and outcomes of its modern slavery risk management processes across its operations and supply chains.

**Changes in supplier risk profiles**

The Prime100 Group will monitor changes in supplier risk ratings over time, using its risk assessment framework described above to assess whether:

- the supplier base remains predominantly low-risk; and
- engagement with medium and high-risk suppliers leads to improved modern slavery controls and, where appropriate, reduced risk levels.

**Policy implementation, training and compliance checks**

The Prime100 Group will monitor the effectiveness of its internal policy framework by:

- tracking the implementation and completion of employee training; and
- monitoring any instances of non-compliance with its Modern Slavery and Minimum Labour Standards Policy.

Over time, the Prime100 Group will assess whether corrective actions are implemented promptly and whether recurring issues decline across successive review cycles.

**Supplier engagement and due diligence outcomes**

The Prime100 Group will assess the effectiveness of its supplier engagement activities by tracking:

- the extent to which suppliers provide modern slavery policies or related information; and
- whether follow-up engagement leads to improved visibility of supply chain practices and risk mitigation measures.

**Labour hire verification**

The Prime100 Group will assess the effectiveness of its labour hire due diligence processes by monitoring:

- labour hire provider questionnaire responses; and
- the extent to which supporting information is provided and verified.

**Use of Colgate-Palmolive tools and expertise**

The Prime100 Group will continue to work with Colgate-Palmolive to strengthen its approach to monitoring and mitigating modern slavery risks. Effectiveness will be assessed by:

- observing trends in supplier risk ratings;
- assessing whether interventions are more effective over time.

The Prime100 Group acknowledges that its approach to measuring effectiveness will continue to evolve as its processes mature and intends to enhance its systems, governance and review mechanisms over time.

**Process of consultation**

In preparing this Statement, Prime100 consulted with Prime100 LLC and relevant internal stakeholders to gather information about the Prime100 Group's operations and supply chains, modern slavery risk identification and controls and actions taken during the Reporting Period.

Consultation occurred through various meetings and internal information-gathering processes, including engagement with relevant personnel responsible for supplier onboarding procurement and risk assessment activities.

Consultation with Prime100 LLC was proportionate to the Group's operating model. Given that Prime100 LLC does not have direct employees and operates through a third-party manufacturer and third-party distributors, consultation was conducted by the individual within Prime100 responsible for oversight of those arrangements and review of information relevant to supplier and operational risks associated with Prime100 LLC's activities.

**Future focus**

The Prime100 Group is committed to continuing to strengthen its approach to modern slavery risk management.

The key focus area for the next reporting period will be enhancing contractual controls with suppliers, as the Prime100 Group recognises the importance of embedding modern slavery risk management within its contractual and commercial arrangements. The enhancement to its supplier contracting framework will include incorporating contractual provisions that require suppliers to comply with applicable laws and ethical standards, along with requirements to notify the Group of any actual or suspected breaches and provide information to support ongoing risk assessment.

Other key focus areas include:

- enhancing due diligence processes for higher-risk suppliers;
- implementing a formal remediation framework; and
- leveraging external tools and expertise to improve monitoring and reporting.

**Approval**

This Statement was approved by the board of directors of Prime100 in their capacity as principal governing body of Prime100 on 24 June 2026.

Signed:

Jason Gray

Jason Gray
Chief Executive Officer