



# Modern Slavery Statement 2024

For the year ending 31 December 2024



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# CEO Statement

At RPF, we believe business has a responsibility beyond profit: to protect people, dignity, and freedom. Modern slavery—in all its forms—has no place in our world, and certainly no place in our operations or supply chains.

This statement reflects our commitment to act with vigilance, integrity, and courage. Over the past few years, we have strengthened our safeguards, deepened supplier partnerships, and empowered our people to recognise and confront risk. Yet we know this is not a challenge solved in a single year. It is a continuous journey—one that demands persistence and accountability.

As CEO, I am determined that we will stand on the right side of history. We will use our influence to drive change, our voice to raise awareness, and our actions to ensure every person connected to our business is treated with fairness and respect.

Together, we can build a future where exploitation has no hiding place—only opportunity, dignity, and freedom.



# Our Mission and Values

At RPF, our mission is to improve the quality of pets lives together by championing fresher nutrition. This commitment guides every aspect of our operations - from our nutritional philosophy and healthy, delicious dog and cat recipes, to the sourcing of real, fresh ingredients from local farmers in Australia and New Zealand, to our kitchens, cooking facilities, our people, sustainability initiatives and community partnerships.

For more than 30 years, RPF has pioneered fresher pet nutrition. Advances in our cooking techniques now allow us to produce food that is fresher, less processed, and even raw and unprocessed. Scientific research continues to validate what pet owners have long understood: fresher nutrition supports the health and wellbeing of our beloved dogs and cats.

To pioneer and change the way the world feeds their pets, we need to have strong values that support this ambition. Whether you interact with RPF as an employee, partner, supplier, or customer, you will find we live and work by the four core values:



## Work as a Pack

When we work together, our ideas and execution get better. We are a unique collective of diverse, talented people who think fresher.



## Change the Game

Fresh thinking is the cornerstone of being a game changer. We're restless, striving to create a better life for our pets.



## Lead with Passion

We're pioneering a new era of pet food. It's our passion. It's why we are leaders in educating the benefits of feeding fresher.



## Make your Mark

Here you can do your best work because everyone plays an important role in creating a world where every pet every day eats fresher and lives better.

These values underpin our commitment to development, purpose, diversity, inclusion, and equality. We want our people, and the people in our supply chains and communities to thrive.

# Reporting Entity

The RPF Group (“RPF”) is a large, global pet food company with the majority of employees in Australia and operations in multiple international locations. RPF is a privately-owned business, with its ultimate holding entity, TopCo Investments Pte. Ltd., incorporated in Singapore. This Modern Slavery Statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) for the reporting period 1 January 2024 to 31 December 2024. RPF entities covered by this statement are listed below:

Topco Investments Australia Pty Ltd

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RPF BidCo Pty Ltd

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RPF (Shanghai) Limited

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Topco Investments Pte Ltd (Singapore)

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Real Pet Food Company Pty Ltd (ACN 618 564 257)

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Game Meat Processing Pty Ltd (ACN 115 499 333)

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Australian Pet Brands Pty Ltd (ACN 138 614 150)

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VIP Petfoods (Aust.) Pty Ltd (ACN 069 880 164)164)

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Consolidated Manufacturing Enterprise Pty Ltd (ACN 135 904 282)

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Vet’s Best Products Pty Ltd

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Pin Whistle Pty Ltd

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People for Pets Pty Ltd

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VIP Nominees Pty Limited

---

Swanbrook Road Holding Trust

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Vetco Australia Pty Limited

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Real Pet Food Company (Hong Kong) Ltd

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Real Pet Food Company Singapore Pte Ltd

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Real Pet Food Company Ltd (NZ)

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Real Pet Food Company (Shanghai) Co. Ltd

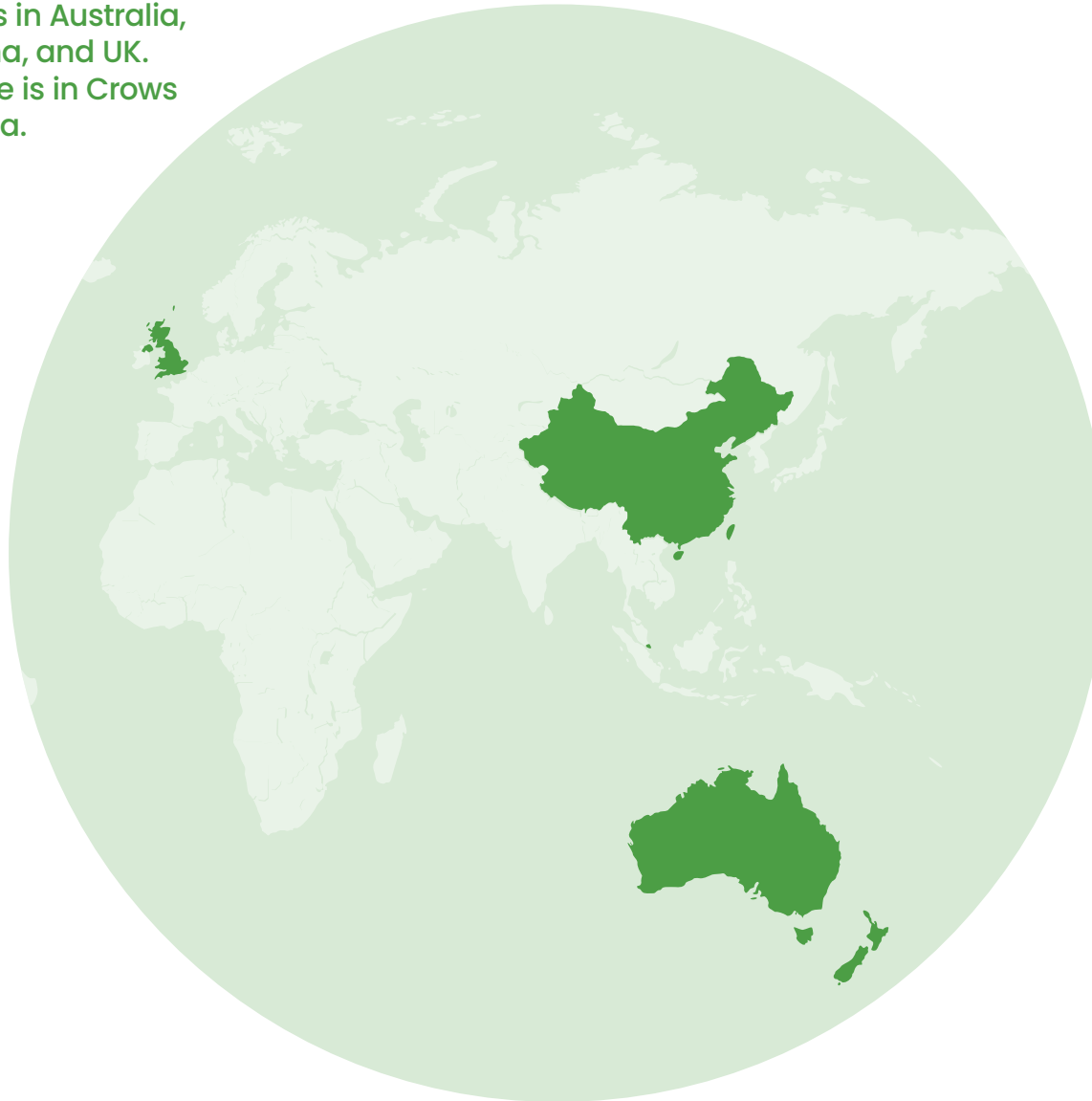
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RPF Group Limited (UK)

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# Our Structure

RPF has operations in Australia, New Zealand, China, and UK. The RPF head office is in Crows Nest, NSW, Australia.



## Australia

**590**  
Employees

**126**  
Employees  
Ingleburn, NSW  
Mfg Site

**176**  
Employees  
Yatala, QLD  
Mfg Site

**71**  
Employees  
Dubbo, NSW  
Mfg Site

**61**  
Employees  
GMP, QLD  
Mfg Site

**22**  
Employees  
Somersby, NSW  
Mfg Site

**134**  
Employees  
Crows Nest, NSW  
Head Office

## UK

**24**  
Employees  
Mfg Site/ Sales Office

## Singapore

**3**  
Employees  
Sales Office

## New Zealand

**106**  
Employees

**33**  
Employees  
Auckland  
NZ Head Office

**57**  
Employees  
Bombay  
Mfg Site

**16**  
Employees  
Christchurch  
Mfg Site

## China

**10**  
Employees  
Sales Office

# Our Operations

RPF's operations primarily consist of operating pet food manufacturing facilities, including managing, and overseeing the working conditions of our employees. We manufacture and distribute fresh, chilled, dry, and wet pet food as well as treats for dogs and cats in Australia, China, New Zealand, the United Kingdom, and throughout Asia.

In addition to manufacturing, our operations include the sale, marketing, and distribution of our products to ensure pets and their owners have access to high-quality nutrition and related products.

## What we do:

Processing & Manufacturing

Co-manufacturing

Sourcing

Logistics & Distribution

Marketing Sales & Support

## Our Relationship to potential modern slavery risks:

### Causes

- Unlikely where workers directly employed in our operations

### Contribute

- Outsourced services
- Use of labour hire contractors and seasonal workers
- Cost targets
- Co-manufacturing

### Directly Linked

- Extended business partnerships
- Transport & Logistics (including sea freight)

## How we manage modern slavery risk and demonstrate due diligence:

### Good Corporate Governance

- Code of Conduct
- Board Oversight
- Corporate Risk Framework
- Whistleblowing Policy & Speak Up platform
- Executive Leadership
- Modern Slavery Working Group

### Supplier Engagement & Due Diligence

- Supplier Risk Prioritisation
- Supplier Engagement
- Supplier Review & Monitoring
- Supplier Code of Conduct
- Supplier eLearning
- Corrective Action Plan Implementation
- Supplier Fact Sheet
- Tier 2 Supplier Risk Warning

### Education & Training

- Staff Awareness Sessions
- Employee Inductions
- Procurement Training
- Modern Slavery eLearning
- Executive and Board Engagement & Training

# Our Supply Chains

In 2024, we focussed on simplifying our supply chains by consolidating procurement with preferred suppliers wherever possible. This approach reduces complexity, minimises supply risk and strengthens partnerships on key areas such as modern slavery and sustainability. Our ambition is to partner with a smaller number of suppliers to achieve full transparency and ensure strong assurance around ethical and responsible sourcing.








There were no significant changes to our preferred suppliers during the reporting period. As a result, there has been no notable change to the procurement risk profile between the 2023 and 2024 reporting years.

Over 70% of our spend, and three-quarters of our suppliers, are based in Australia. Our international suppliers are predominantly located in New Zealand, the United States, China, Germany, the United Kingdom, Singapore, the Netherlands, Thailand, Italy, Vietnam, and Serbia.

The main categories of goods and services procured from our direct suppliers is as per below.

# What we buy

## GOODS

-  Meats, Poultry/Seafood
-  Food Additives
-  Agricultural Products
-  Packaging
-  Finished Goods
-  Oils (Fish, Emu, Sunflower)
-  Office Furniture/Fittings/Supplies

## SERVICES

-  Cleaning Services
-  Graphic Design/Printing Services
-  Transportation And Logistics, including 3PL services
-  Machinery
-  PPE And Clothing
-  Maintenance Services
-  Labour Hire
-  Professional Services

# Operational Risks

**RPF acknowledges that modern slavery risks may exist across both our direct operations and our global supply chains. While the nature and extent of these risks differ, we remain committed to identifying, assessing, and managing them in a structured and transparent way.**

RPF operates in industry sectors known to carry heightened risks of modern slavery, including meatworks, agriculture, and food processing. While strict compliance with regulatory requirements, internal policies and governance processes mean the risk of modern slavery within our Australian operations is considered relatively low, we acknowledge potential vulnerabilities. These risks are most likely to arise where labour hire agencies are used to provide short-term contract workers and seasonal labour, as well as temporary migrant workers.

RPF also recognise that risks may exist in our broader business relationships, including our comanufacturing arrangements and the procurement of goods and services through our extended supply chain. Risks are elevated in cases where suppliers operate in countries identified as having a higher risk for modern slavery.

To strengthen our governance framework, we completed a comprehensive gap analysis to assess our maturity in managing modern slavery risks. The timing for the review and next phase of this maturity assessment is currently being determined.

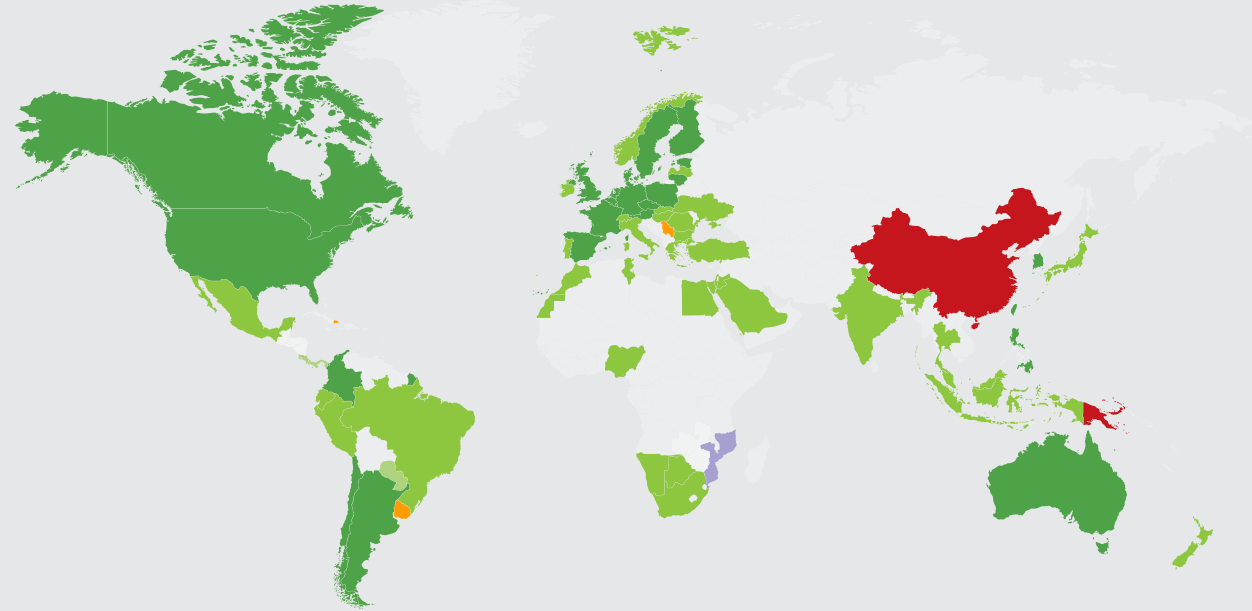


# Supply Chain Risks

During 2024 we continued to address risks identified through our enhanced supplier due diligence program. Since 2023, we have partnered with a technology provider in order to digitise our due diligence program. As a result of this investment, in 2024 we expanded the pilot program conducted in 2023 and commenced a re-assessment of our supplier base whilst continuing to use our 2020 modern slavery risk prioritisation as a baseline.

As a result, assessments now cover more than 70% of our supplier base, representing over 75% of our total spend. The participation rate has shown an elevated level of engagement from our supplier base.

The geographical profile of the respondents listed countries of operation are represented as follows, overlaid with the Trafficking in Persons Report tiers:



- Tier 1**

Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.
- Tier 2**

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.
- Tier 2WL**

Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.
- Tier 3**

Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.
- Tier Special Case**

Due to civil conflict and humanitarian crises, gaining information is difficult and a tier has not been assigned.
- Uncategorised**

At the date of this assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

The assessment methodology involves requesting participating suppliers to complete a self-assessment questionnaire online. Subsequent to each supplier completing and submitting its questionnaire, responses are assessed to determine modern slavery risk scores and associated risk category against benchmark criteria. Each supplier is then assigned a risk category based on the table on the right.

		Inherent risk		
		Very high	High to Moderate	Low-risk
Risk control	Adequate	High-risk (High levels of inherent risk)	Low-risk (Adequate risk control)	High-risk (Low levels of inherent risk)
	Partial		Medium-risk (Partial risk control)	
	Inadequate		High-risk (Inadequate risk control)	

To determine the appropriate risk category, responses are first evaluated for risks inherent to a suppliers’ operations, production, and sourcing. This is referred to as the Inherent Risk Score. This is calculated based on the four criteria and definitions shown below:

### Industry sector



Specific industry sectors deemed as high risk in international and national guidance documentation. This includes sectors with high-risk business models such as use of labour hire workers and outsourcing, seasonality, franchising and aggressive pricing.

### Geographic location



Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI and using the SD Strategies country risk matrix which assesses risks against 13 global indices. High risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State’s failure to protect human rights. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters.

### Commodity/ product



Specific products and commodities or raw materials deemed as high risk by the US Department of Labor’s 2021 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.

### Workforce profile



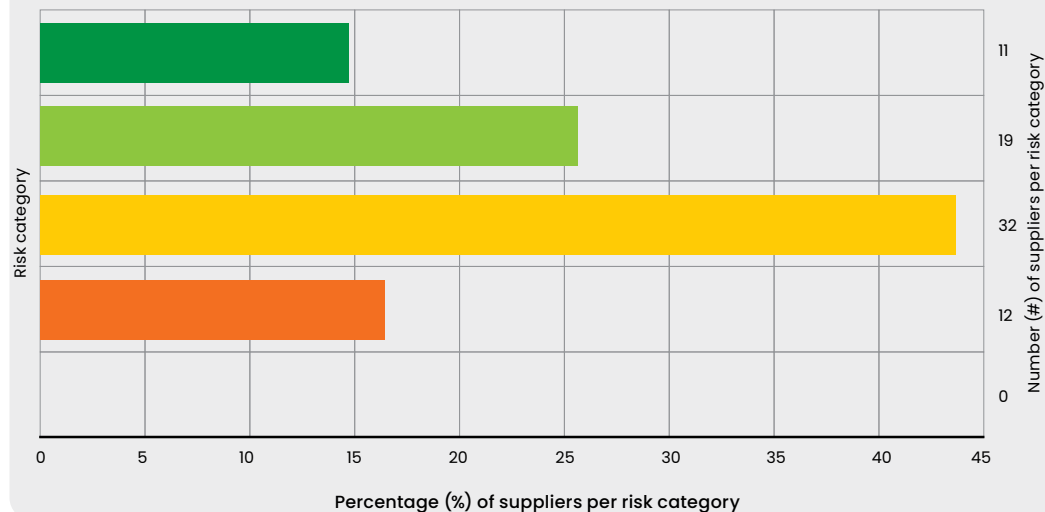
In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where base-skill, vulnerable or migrant labour is used.

The Unmitigated Risk Score is then evaluated. This is calculated based on the policy and procedure responses in the questionnaire, demonstrating the level of control over the Inherent Risk towards mitigating that risk. These are categorised as having inadequate, partial, or adequate risk control.

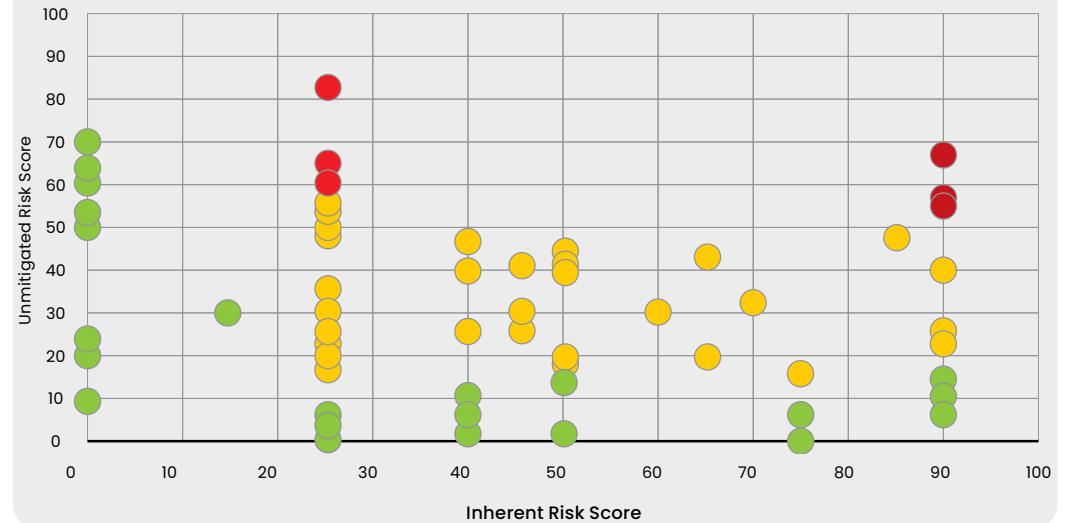
Each supplier is given feedback through the system on the items that require further attention based on their responses to the questionnaire and how mitigating those risks more appropriately would affect the overall risk score.

These are also aggregated, giving RPF visibility over the most impactful actions to undertake to further reduce risk in the supply chain. When compared to 2023, RPF's overall Inherent Risk Score in 2024 has reduced by 12%.

Based on the assessments completed in the 2024 reporting year, the analysis of risk level is per the graphic shown below. The assessments highlight that there is an opportunity to partner with providers in the RPF supply chain to strengthen policy documentation and education in particular, as many of the suppliers who have been assessed in the High Risk and Medium Risk categories are scored as having opportunity in these areas.



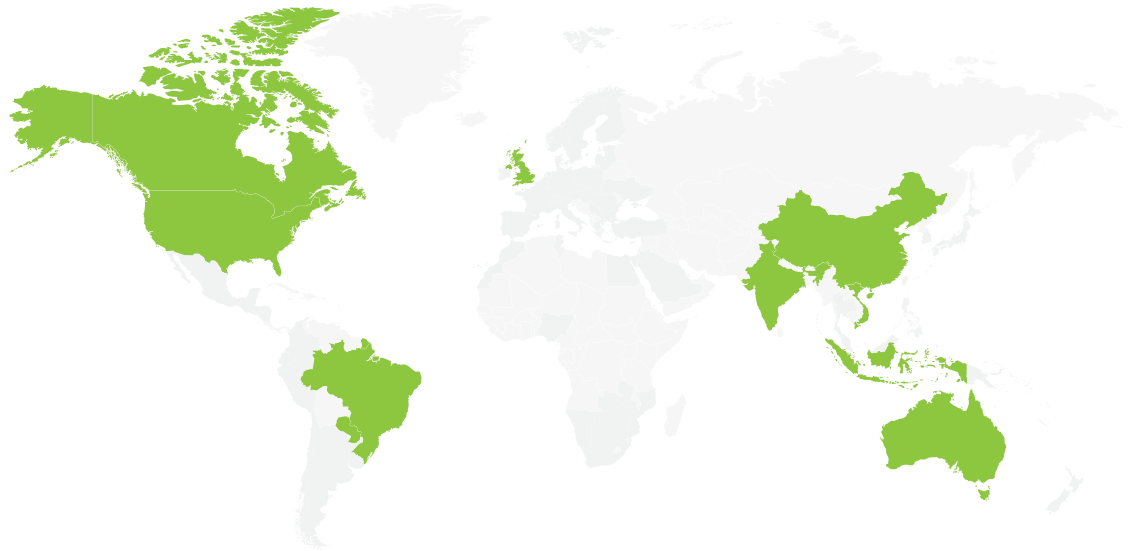
The graphic set out below shows the relationship between the Inherent Risk Score and the Unmitigated Risk Score for the respondents.



# Tier 2 Supplier Risk

## Risk by Category

While working with our Tier 1 (direct) suppliers, we acknowledge that there are also potential modern slavery risks among our Tier 2 (indirect) suppliers. More than two thirds of assessed suppliers as at the end of 2024 sourced goods from one or more high-risk sectors, which are represented below:



These suppliers indicated the countries or regions from which high-risk goods are sourced. The graphic to the right shows the countries from which these high-risk goods are sourced and the below details which goods and services are sourced from these countries.

### Australia

- Alarms and access control
- Child Care Centre cleaning
- Contractor management services
- Educational Facilities ( school or university) cleaning
- Facilities maintenance
- Industrial cleaning
- Lighting
- Meat or poultry killing
- Meat or poultry preparation
- Meat or poultry slicing
- Meat or poultry boning
- Meat or poultry packing
- Meat or poultry processing

- Mobile patrols
- Other cleaning services
- Painting
- Plumbing
- Restroom cleaning
- Rubbish removal
- Window cleaning
- CCTV
- Commercial cleaning
- Disability Facilities and Home Care cleaning
- Electrical
- Fire and safety and detection
- Leisure, Entertainment or Hospitality cleaning

- Medical, Aged Care of Hospital cleaning
- Other building services
- Other security services
- Perimeter security
- Recruitment and placement
- Roof cleaning
- Surveillance

### Brazil

- Cattle

### Canda

- Alarms and access control

### China

- Copper, Electronics, Garments

### Indonesia

- Fish

### Paraguay

- Cattle

### India

- Rice

### Pakistan

- Rice

### Vietnam

- Fish, Rice

### United Kingdom of Great Britain and Northern Ireland

- Alarms and access control

### United States of America

- Alarms and access control
- Commercial cleaning
- Facilities maintenance
- Meat or poultry packing
- Surveillance
- CCTV
- Contractor management services
- Industrial cleaning
- Meat or poultry preparation

This initial high-level assessment of our Tier 2 suppliers demonstrates the importance of assessing modern slavery risk in our extended supply chain and engaging suppliers effectively beyond our direct or Tier 1 suppliers when implementing modern slavery due diligence processes.

Note that some suppliers were unable to answer this question and their responses are therefore not represented on this chart.

## Actions Taken in 2024

In 2024, RPF implemented a number of key initiatives to address modern slavery risks within our operations and supply chains. These include:



Continuing to assess how effectively suppliers are addressing Modern Slavery risks through our procurement and supplier assessment process.



Deepening engagement with suppliers by incorporating modern slavery discussions into strategy sessions and business review meetings.



Progressing suppliers on corrective action plans to address identified gaps and strengthen compliance.



Expanding the use of our technology solution to enhance the management of modern slavery risks, including the capture and monitoring of supplier assessments, inherent and mitigated risk score, corrective action plans, and progress over time. This capability enables us to track improvements in overall risk mitigation and focus on the areas of greatest impact.

RPF regularly reviews its modern slavery risk management action plan and due diligence processes as part of our corporate sustainability and risk management reviews. Our risk assessment procedure requires an annual review of all risks and controls, including modern slavery risks identified within our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate modern slavery risks and continue to refine our approach to measuring both processes and outcomes.

### At RPF, an effective response to modern slavery risk management includes:

#### Strong Governance



A robust governance framework, with a clear commitment to accurately identify and, where appropriate, remedy modern slavery vulnerabilities and cases

#### Assessment, Management and Reporting



Transparent assessment and reporting of modern slavery risks across our operations and supply chains, including tracking identified risks, issuing corrective action requests, and ensuring timely improvements are implemented.

#### Engaged Staff and Suppliers



Actively engaging with suppliers beyond contractual obligations, supported by our Responsible Sourcing Strategy. This includes empowering our procurement teams to address risks directly with high-risk suppliers, building trusted relationships, and ensuring corrective action requests are implemented within agreed timeframes.

# Effectiveness Indicators

In 2024, we continued to align the effectiveness of our actions against a set of qualitative and quantitative indicators.

Increasing the effectiveness of measurement and assessment of both processes and outcomes indicators remains a priority activity.

Area of Focus	Activity	Qualitative Indicators	Quantitative Indicators
<b>Governance &amp; Policies</b>	<ul style="list-style-type: none"> <li>Continued to assess Modern Slavery risks in Requests for Tender</li> </ul>	<ul style="list-style-type: none"> <li>Standing item in ELT and Board R&amp;S Committee meetings</li> <li>Enhanced understanding and discussion of human rights and labour rights risks and consideration in company decision making</li> <li>Broad agreement across organisation of the need for Responsible Sourcing practices and willingness to implement</li> </ul>	<ul style="list-style-type: none"> <li>Number of modern slavery, labour rights and human rights issued raised or questions asked in management meetings</li> <li>Percentage policies reviewed, updated, and integrated</li> <li>Number of contracts with updated Ts &amp; Cs incorporating Modern Slavery considerations</li> </ul>
<b>Risk Management</b>	<ul style="list-style-type: none"> <li>Ongoing risk assessments</li> </ul>	<ul style="list-style-type: none"> <li>Board review and update of risk framework</li> <li>Annual risk appetite assessment completed</li> <li>Increased understanding across workforce on potential modern slavery risks in different operating environments</li> </ul>	<ul style="list-style-type: none"> <li>Number of human rights or labour rights risks identified and documented in risk register</li> <li>Number of risk mitigation actions implemented</li> <li>Number of modern slavery maturity targets achieved</li> </ul>
<b>Supplier Engagement &amp; Due Diligence</b>	<ul style="list-style-type: none"> <li>Engaged with suppliers on a deeper level regarding Modern Slavery issues</li> <li>Extended program of the technology solution to make assessment and tracking simpler for suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Engagement and education of suppliers</li> <li>Number of highest risk suppliers invited to complete shallow and deep dive assessments</li> <li>Supplier feedback on due diligence process and benefits</li> <li>Percentage of review meetings undertaken</li> <li>Assisting suppliers in completing the SAQ and subsequent action plan</li> </ul>	<ul style="list-style-type: none"> <li>Percentage suppliers engaged and trained</li> <li>Percentage supplier responses to SAQ</li> <li>Percentage suppliers responding to deeper dive assessments</li> <li>Number of corrective action requests issued and completed</li> <li>Number of KPIs included in the SRM program for key suppliers</li> <li>Number of suppliers completing eLearning module</li> </ul>
<b>Internal Engagement, Education &amp; Training</b>	<ul style="list-style-type: none"> <li>Employee, management and executive engagement and training</li> </ul>	<ul style="list-style-type: none"> <li>Staff participate in training</li> <li>Enhanced organisational awareness of modern slavery risks – including increased discussion among all personnel</li> <li>Increased Board and Executive interest in and support of modern slavery risk management program</li> </ul>	<ul style="list-style-type: none"> <li>Percentage relevant staff trained</li> <li>Number of Board engagements / presentations in 12 months</li> </ul>
<b>Grievances Mechanisms and Reporting</b>	<ul style="list-style-type: none"> <li>Modern Slavery Statement</li> </ul>	<ul style="list-style-type: none"> <li>Whistleblower Policy widely distributed</li> <li>Speak Up platform actively communicated</li> <li>Percentage of issues effectively addressed</li> <li>Alignment of grievance mechanism to UNGPs</li> <li>Modern Slavery Statement submitted on time</li> </ul>	<ul style="list-style-type: none"> <li>Total number of issues raised</li> <li>Percentage of issues effectively addressed</li> <li>Number of stakeholder engagements held on grievance and remedy</li> </ul>

All entities under the control of RPF operate within a common and consistent governance framework designed to raise awareness of and embed a consistent approach to addressing modern slavery risks in its operations and supply chains. All entities share the same executive leadership team, who have been consulted in the drafting of this Statement to ensure alignment and accuracy.

## Our Communities

Our pet parents and the communities they live in are the heart of Real Pet Food. As awareness of pet health and nutrition grows, our loyal consumer base continues to grow. We want our consumers to know that by choosing Real Pet Food products, they are not only making the best choice for their pets, but also contributing to initiatives that support people, our pets, and our planet.

To give back to communities closest to us, we run a Community Grants Program at each of our production sites. This program supports local initiatives and strengthens the connection between our business, our people, and the communities in which we operate.

We remain committed to building a future that is cleaner, kinder, and safer for everyone and every pet.



