



Modern Slavery Statement

Introduction

Healthy Pet Co. Pty Ltd (HPC) is an online retail company that provides pet supplies for dogs and cats Australia wide.

This voluntary statement is in accordance with the *Modern Slavery Act 2018* (Cth) (Act) for the purpose of assessing and addressing modern slavery risks in the operations and supply chain of HPC and details the steps put in place to deliver against our goals during the reporting period 01 July 2024 to 30 June 2025.

Values

HPC is committed to respecting human rights and conducting business in an ethical and socially responsible manner. We strongly oppose abuses of a person's freedoms in our direct operations, our indirect operations, and our supply chain.

We recognise the importance of our role in combatting the problem of modern slavery and human trafficking which impacts communities and individuals globally. As such, we operate with integrity and transparency and actively enforce effective control measures to minimise the risk of modern slavery and human trafficking in all facets of our business.

Healthy Pet Co. structure, operations, and supply chains

Formed in 2024, HPC is a privately owned Australian company, which provides pet supplies for dogs and cats within Australia via an online platform.

Headquartered in Melbourne, our operations span across every state and territory in Australia, employing 6 staff in Australia. These employees work in our Head Office and maintain the Administration, Finance and Daily Operations of our business.

Additionally, we employ / engage a further 1 person in the Philippines, via an Australian owned partner company, across the following areas: Finance, and Customer Service.

Our supply chain includes the drop ship of products from a third-party logistics wholesaler based in Victoria.

We also work with various third parties in our supply chains which provide certain services to assist with the everyday running of our businesses, such as BYTE (IT provider), Business Hub (partner with MYOB Acumatica for Finance and Payroll), Smartsourcing (Philippine partner), and Eastern Distributors (Distributor).

Risks of modern slavery practices

We acknowledge that by virtue of contracting with other parties, whether as a client or as a supplier, there is always some risk that may contribute to modern slavery practices. We expect our clients, suppliers, manufacturers and potential suppliers and manufacturers to aim for high ethical standards and to operate in an ethical, legally compliant, and professional manner. We also expect our clients and suppliers to promote similar standards in their own supply chains.



In 2023, the Global Slavery Index identified North Korea, Eritrea, Mauritania, Saudi Arabia, Turkey, Tajikistan, United Arab Emirates, Russia, Afghanistan, and Kuwait as the countries where individuals were most at risk of being subject to modern slavery. Upon the review of our suppliers, we confirm that none of our direct suppliers operate within these 10 countries where modern slavery is most at risk.

Actions taken by HPC to assess and address modern slavery risks

HPC is committed to continuous improvement and regularly reviews and updates our policies and procedures, in order to address any emerging risks and challenges. We work collaboratively with our suppliers, manufacturers clients, stakeholders, and industry partners to share best practices and promote responsible business practices in the industries in which we operate. We expect our suppliers to comply with all applicable legislative obligations and include pre-acceptance questionnaires and clauses in contracts specific to identifying and eliminating the risks of modern slavery in the supply chain.

Other actions to reduce risks around modern slavery practices include the implementation of various policies and procedures which must be adhered to by employees, management, and suppliers.

Members of the HPC Executive team conduct annual site visits with the majority of our external partners.

Training

We maintain a continuous focus on training and collaboration to improve awareness and knowledge amongst our workforce.

Our modern slavery training covers:

- our purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labor engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Assessing effectiveness

HPC continues to assess the effectiveness of its actions in comparison to industry standards and practices. HPC has a range of methods on how we assess the effectiveness of its actions, including:

- establishing and improving processes to review the actions we have taken, including regular reviews by our Modern Slavery working group.
- internal audits of specific steps taken to assess and address modern slavery risks.



- working closely with our suppliers and manufacturers to check how they are progressing, including any actions they have put in place to address modern slavery risks.
- monitoring legislative updates and amendments to ensure HPC remains compliant with Modern Slavery regulations and obligations, including an annual review of this policy.

Responsibility for our modern-slavery initiatives

- **Policies:** Responsibility for creating, distributing, and regularly reviewing policies is with CEO, GM Human Resources, GM Retail and Marketing and GM Finance & IT. Significant alterations to policy will be presented to the Altara Board.
- **Risk assessments:** Responsibility for establishing and implementing the risk analysis process is with CEO and GM Human Resources.
- **Investigations/due diligence:** Responsibility for proactively performing due diligence and conducting investigations is with GM Human Resources and GM Retail and Marketing and with findings reported to the CEO and HPC Board.
- **Training:** Training has been provided for key staff whose roles expose them to human rights and modern slavery practices. This training will be completed and refreshed at a minimum of every 6 months.

To date, HPC has not identified any supplier to be in breach of any modern slavery legislation or in breach of other supplier policies held by HPC.

HPC commitment

HPC is committed to upholding its current practices and effectively addressing risks of modern slavery and human trafficking, to reduce any possible prevalence of such risks in our operations. HPC remains dedicated to retaining and further strengthening practices that continuously reduce any possible slavery and human trafficking risks. Over the next year our commitment will be:

- to establish a modern slavery working group continue to meet once every 6 months to review our current risk assessment process, action plans, training, future commitments, and review of our Modern Slavery Statement.
- CEO, GM Human Resources, and GM Finance & IT to continue reviewing our supply chain to identify any weaknesses and rectify any areas of concern.
- introducing self-assessments by key suppliers and manufacturers including ongoing engagement and consultation with suppliers to identify and prevent slavery within the supply chain.
- reviewing and updating training modules where required to ensure relevance and effectiveness.
- continuously reviewing and improving current policies & processes to include specific references to modern slavery.
- continuing to raise awareness on the policy.

We will continue to monitor our suppliers' and manufacturers operations to promptly identify increased risks and update relevant supplier agreements and employee training and policies where necessary to combat increased risks and adapt to the evolution of modern slavery laws.

Consultation process

The working group consulted key internal stakeholders in the preparation of this statement via meetings, to discuss the activities within the business unit to better understand modern slavery risks, actions taken across the business and the effectiveness of these actions.



HPC will continually review its suppliers and manufacturers for any increased risks and update all relevant supplier agreements and employee policies and training as modern slavery laws evolve.

Other information relevant to the statement

The following policies within our organisation describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. These policies are located within the HPC Policy and Procedures Manual:

- Whistleblowing policy
- Code of Conduct
- Supplier/Procurement Code of Conduct
- Recruitment policy
- Anti-Discrimination Policy
- Bullying and Harassment Policy

Approval of Statement

This statement has been approved by the Board of Healthy Pet Co. in June 2025, and is signed by our Co-Founder & Managing Director, Karon Hughes.

Co-Founder & Managing Director

Date: 01 July 2025