



MODERN SLAVERY STATEMENT FY25



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.

A MESSAGE FROM PET CIRCLE

At Pet Circle, we are committed to respecting human rights and managing our modern-slavery risks. In FY25 we took practical steps to lift visibility and set clear expectations with our partners. We issued an electronic Trade Partner Review to a significant share of our Tier-1 product suppliers and captured evidence on policies, workforce profile, subcontracting controls, high-risk inputs and origins, and any incident history.

As part of the review we asked suppliers to acknowledge Pet Circle's Supplier Code of Conduct, and we recorded those acknowledgements. We also delivered modern-slavery awareness training, so our teams know what to look for in everyday sourcing decisions and how to escalate concerns.

This work is ongoing. We will continue the Trade Partner Review with remaining and newly onboarded suppliers and expand it to our own brand product suppliers and key services providers. We will keep rolling out the Supplier Code of Conduct and seek straightforward evidence where suppliers handle higher-risk inputs or geographies.

For Pet Circle own-brand products, we will keep building basic visibility of manufacturing sites and key material origins where practicable. Our modern-slavery working group will provide regular updates to the Executive Leadership Team so we can make timely decisions, respond to legislative developments, and refine our questions as new risks emerge.

Our goal is steady, measurable progress. We are aiming to bring more suppliers into scope, close open queries, and follow up on issues of concern until they are resolved or suitably mitigated. By doing this consistently - and by working openly with our partners - we aim to strengthen transparency and help ensure the products our customers trust are sourced responsibly.



Alistair Venn
Chief Executive Officer
4 December 2025

This statement was approved by the board of Millell Pty Ltd in their capacity as principal governing body of Millell Pty Ltd on 3 December 2025.

1. REPORTING AND CONSULTATION

This modern slavery statement has been prepared to meet the requirements of the Modern Slavery Act 2018 (Cth). It outlines the steps taken by Millell Pty Ltd (ABN 17 148 151 213), trading as Pet Circle, to identify and address modern slavery risks during the period 1 July 2024 to 30 June 2025 (FY25). To comply with the Modern Slavery Act 2018 (Cth), Pet Circle addresses the following key criteria in this statement:

- **Identify the reporting entity**

Details about the reporting entity are provided page 4 of this statement.

- **Describe our structure, operations, and supply chains**

A description of Pet Circle's structure, operations, and supply chains is available on pages 6 – 18 of this statement.

- **Describe our modern slavery risks**

The specific risks of modern slavery practices within Pet Circle's operations and supply chains are outlined on pages 19 – 32 of this statement.

- **Actions taken to address modern slavery risks**

Pet Circle outlines the steps it has taken to assess and address modern slavery risks on pages 33 – 38 of this statement.

- **Assessing the effectiveness of our actions**

This statement explains how Pet Circle evaluates the effectiveness of its efforts to mitigate modern slavery risks pages 39 – 40 of this statement.

- **Describe the process of consultation**

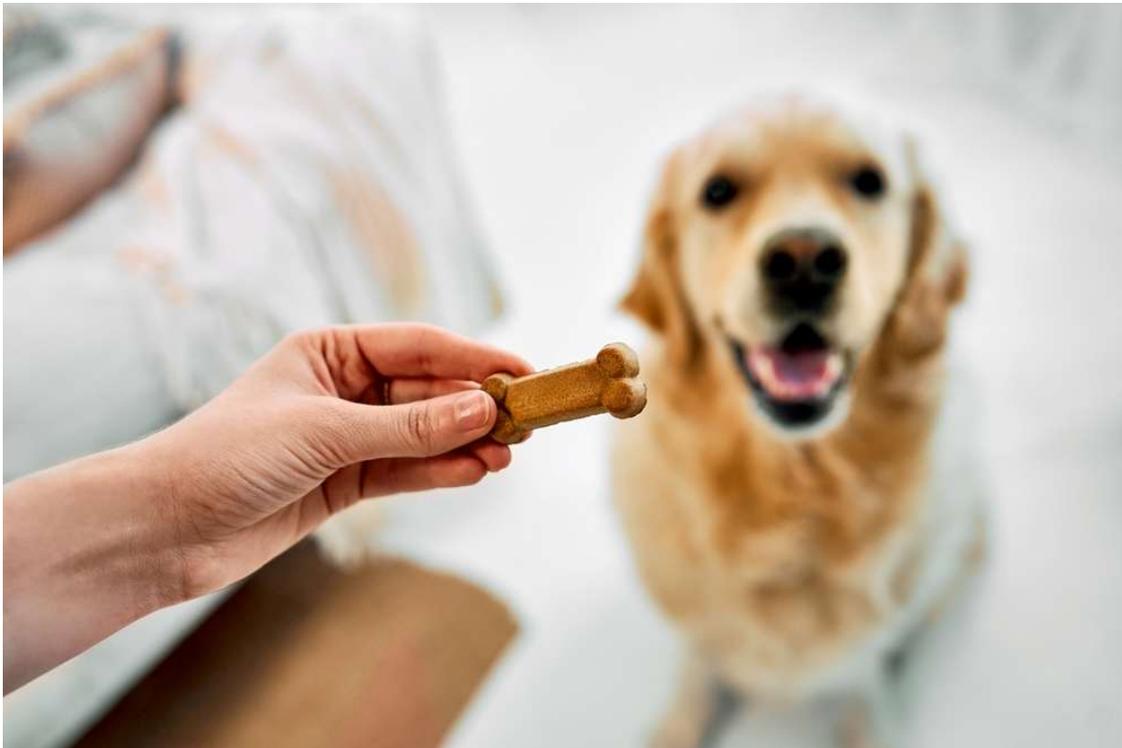
The consultation process undertaken is described on page 5 of this statement.

- **Other relevant information**

Additional details, including Pet Circle's goals for FY26, are provided on pages 41 – 42 of this statement.

Consultation

Our team engaged with key stakeholders across Pet Circle, including management and buying teams, to gather insights into our supply chains and operations. This process involved reviewing existing measures to monitor and address modern slavery risks. The draft statement was then shared with members of our executive leadership team for their feedback and input before being finalised for approval.



OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Founded in 2011, Pet Circle has become a leading online pet retailer, offering an extensive range of high-quality products that support the health and happiness of pets. From premium food and nutritious treats to engaging toys, stylish accessories, and essential health and wellness supplies, Pet Circle continues to redefine convenience for pet owners through a seamless online experience, fast delivery, and trusted expert advice.

Our partnerships now include pet insurance and pet prescription products, while our delivery capabilities have grown through our fleet partnerships. We have expanded our private label range to include food, treats, bedding, toys, and cat furniture - ensuring even greater choice, value, and quality for our customers. In addition, our online general pet health, nutrition and lifestyle advice platform managed by our in-house team of registered veterinarians continues to provide accessible, reliable support to pet families across Australia.

Beyond our retail operations, Pet Circle remains deeply committed to supporting animal welfare and the wider pet community. We partner with rescue shelters, welfare organisations, and community initiatives to deliver food, supplies, and care to animals in need. Through these collaborations, we extend our mission to nurture happier, healthier lives for pets - whether they are part of our customers' homes or still waiting for one of their own.

Structure and Operations

Pet Circle's website and app remain at the heart of our operations, providing a seamless and personalised online experience for pet owners across Australia. Designed for convenience and reliability, our platform makes it easy for customers to find everything their pets need - from food and treats to toys, accessories, and healthcare products - across all major categories, including dogs, cats, birds, fish, reptiles, horses, and small animals.

Through intuitive navigation, advanced search functions, and the ability to create individual pet profiles, customers receive tailored product recommendations and content specific to their pets' needs. Our Auto

Delivery service continues to be a standout feature, enabling pet owners to schedule regular deliveries of essentials like food and litter.

Each product page provides clear and detailed information, including ingredients, feeding guidelines, and customer reviews, empowering owners to make informed decisions. Beyond shopping, our platform offers rich educational content - from articles and blogs to expert pet care guides - to help customers care for their pets with confidence.

The Pet Circle app enhances this experience even further, allowing customers to manage Auto Deliveries, track orders, and easily reorder favourites. With these digital tools, Pet Circle continues to make pet care simpler, smarter, and more accessible - anytime, anywhere.





Our People

Pet Circle is powered by a passionate, resourceful, and purpose-driven team of pet lovers dedicated to strengthening the bond between pets and their families. Diversity, collaboration, and innovation are at the heart of how we work - fostering cross-functional partnerships that enable us to challenge industry norms and create fresh, customer-focused solutions. This dynamic culture ensures that pets and their wellbeing remain central to every decision we make.

Our team now includes around 500 talented individuals across key sites in Australia, supporting vital business functions such as Marketing, Supply Chain & Operations, Technology, Finance, People & Culture, Merchandising, Customer Experience, Data & Analytics, Product, and Veterinary Support. Globally, our operations are supported by approximately 65 team members in the Philippines who bring valuable expertise in Finance, Customer Service, Marketing, Merchandising, Technology, People & Culture, and Veterinary Support. A dedicated team of 4 professionals in New Zealand further enhances our operational efficiency.

Together, this global team structure allows Pet Circle to deliver exceptional service, innovation, and expertise across every part of our business. United by our shared love of animals, we continue to grow, learn, and evolve - driven by our commitment to improving the lives of pets and the people who care for them.

Supply Chains

Pet Circle operates a large and dynamic supply chain that supports the distribution of thousands of pet products to customers across Australia. Our operations are centred around a network of strategically located warehouses and fulfilment centres, enabling fast and reliable delivery to metropolitan, regional, and remote areas.

Our supplier network is diverse and reflects the broad range of products we offer. It includes global pet food manufacturers, Australian and New Zealand brand partners, private-label producers, packaging suppliers, and logistics and service providers. We work with both large multinational organisations and small to medium local businesses, allowing us to offer trusted global brands alongside emerging and niche products.

Most of our suppliers are based in Australia and New Zealand, supplying premium pet food, health products, and other essentials. We also work with selected international partners across regions such as Asia, Europe, and North America to source categories including toys, accessories, bedding, grooming products, and certain raw materials.

This combination of domestic and international suppliers ensures a reliable, flexible, and high-quality product range. Supported by an integrated logistics network and a dedicated delivery fleet, Pet Circle's supply chain is designed to deliver efficiency, consistency, and value.



2. THE PRODUCTS WE SELL

Pet Circle offers one of the most comprehensive ranges of pet products in Australia, sourced through a broad network of trusted local and international suppliers. Our product portfolio spans premium pet food and treats, health and wellness products, toys, bedding, accessories, and everyday essentials - meeting the diverse needs of pets and their families.

The majority of our products are sourced from reputable suppliers within Australia and New Zealand, reflecting our strong partnerships with domestic manufacturers and brand owners that produce high-quality pet food, treats, and veterinary health products. To complement this local offering, Pet Circle also partners with international suppliers across key regions, including China, Thailand, Vietnam, Malaysia, Taiwan, Singapore, the United States, the United Kingdom, France, Germany, and other European countries. These regions support specialist manufacturing in categories such as toys, accessories, consumables, veterinary pharmaceuticals, and packaging.

This balanced sourcing model enables Pet Circle to maintain a consistent, diverse, and resilient product range - combining trusted global brands with locally made products. It ensures customers have access to safe, high-quality, and innovative pet products that reflect the best of both domestic and international expertise.



Some of Our Local Brands

Pet Circle maintains strong partnerships with a broad network of Australian-based suppliers across pet food, treats, supplements, grooming, and accessories. These suppliers include established national manufacturers, innovative emerging brands, and specialist producers that share Pet Circle's commitment to quality, transparency, and responsible sourcing. By supporting a largely domestic supply base, Pet Circle strengthens local industry capability, ensures consistent product standards, and promotes sustainable business practices within Australia.

Pet food and treats

- Appetite Foods Group Pty Ltd (Australia) – Blackdog, Vitalitae and Pets Own; manufactured in Australia using local fish, meat and dairy; some soy sourced from China.
- Bell and Bone (Australia) – Dog and cat treats made in Melbourne and Queensland using Australian and imported ingredients.
- Buggy Distributors Pty Ltd (BuggyBix) (Australia and Thailand) – Extruded treats and dental bars; operations in Australia and Thailand.
- Huds and Toke Pty Ltd (Australia) – Australian-made treats with dairy and other ingredients sourced in Australia.
- Mimi & Munch (Australia) – Australian-made meat-based treats; chicken, beef, lamb, pork and kangaroo sourced in Queensland.
- Pet Food Australia (Australia) – Australian-made pet foods and treats; meat, insect protein, dairy and egg sourced in Australia.
- PPDS (VIC) Pty Ltd (Australia) – 'Howl Yes' foods and treats; ingredients include meat, fish, insect and plant proteins, dairy, egg and palm-derived inputs.
- Proudi (Australia and Thailand) – Manufacturer for Yumguard products; raw materials sourced from Australia and Thailand.

Supplements, oils and wellness

- DPP Pharmaceuticals Pty Ltd (Daily Dog) (Australia) – Vitamin chews, skin and coat items, and treats; manufactured in Australia.

- Elixinol Wellness (Byron Bay) Pty Ltd (Australia and New Zealand) – Omega oils and wholefood powders; tuna oil and hemp sourced from New Zealand, China and Australia.
- Petz Park (Bavaria Pty Ltd) (Australia) – Pet health supplements; Australian-made with vitamins and minerals sourced in Australia.
- The Wonderfur Company Pty Ltd (Australia) – Pet supplements; manufactured in Australia using locally sourced fish, dairy and vitamin ingredients.
- Zamipet Group Pty Ltd (Australia and New Zealand) – Pet supplements and healthcare products; ingredients primarily from Australia and New Zealand; manufactured in Australia.
- Houndztooth Pty Ltd (Australia) – Wellbeing products alongside foods and grooming; inputs include animal and plant proteins and botanicals.

Grooming and pet care

- Bug & Bun Dog Fragrances Pty Ltd (Australia) – Grooming fragrances under Eau De Dog and Eau De Natural; Australian-made with locally sourced and some imported inputs.
- u groom (Australia and China) – Shampoos and conditioners produced in Melbourne; grooming towels sourced from China.
- Houndztooth Pty Ltd (Australia) – Grooming range in addition to foods and wellbeing products.

Accessories, toys, bedding and containment

- Flipside International Pty Ltd (Australia and China) – Australian-designed toys and accessories; manufactured in China using textiles, rubber and plastics.
- FuzzYard Pty Ltd (Australia and China) – Pet wear, bedding, bowls and toys; Australian design with manufacture in China.
- Sandy Snoots (Australia) – Australian-made pet wear (Dog Rashies); textile inputs.
- Danish by Design Pty Ltd (Australia and Denmark) – Distributor of DogSpace safety gates and pet doors; manufactured in Denmark.
- The Company of Animals Pty Ltd (Australia; United Kingdom, China, Vietnam, Cambodia, United States and United Kingdom for

manufacturing) – Australian arm of a UK business; accessories, toys and grooming produced across multiple countries.

Litter and hygiene

- Oz-Pet (Pellet Heaters Australia) (Australia) – Wood litter and plastic trays; timber by-products from New South Wales; trays made in Victoria.
- Unicharm Australasia (Australia and Japan) – Ezi-Lock Odour litter systems; operations in Australia and Japan; paper-based pellets and pads.

Veterinary, dental and pet health distribution

- iM3 Pty Ltd (Australia and China) – Dental care products and accessories (iM3 and Oxyfresh); bamboo and paper components with some sourcing and manufacture in China.
- HomeoPet Australia Pty Ltd (Australia and United States) – Distributor of HomeoPet health products; manufactured in Florida, United States.
- Pet Alliance Pty Ltd (Australia) – Distributor of Hikari fish and aquatic supplies; imports.
- TimePet Pty Ltd (Australia; multi-country manufacturing) – Distributor of TropiClean, Rogz and Beco; products span foods and treats, care and wellbeing, pet wear, toys, grooming, bowls and feeders.

Some of Our International Brands

Pet Circle partners with a diverse network of international suppliers spanning pet food, animal health, and accessories. These suppliers represent a mix of large multinational corporations and specialised manufacturers, supporting the company's broad product range and high standards of quality.

Pet Food and Nutrition

- Natural Pet Food Group (New Zealand) – Premium wet and dry pet foods under the Zealandia, K9 Natural and Feline Natural brands, with proteins sourced primarily from New Zealand and Australia.
- Hill's Pet Nutrition (Colgate-Palmolive, USA) – Premium pet foods imported through Colgate's global manufacturing network.
- Royal Canin / Mars Petcare / Mars Birdcare (France / USA) – Breed- and condition-specific pet foods manufactured regionally with globally sourced ingredients.
- Nestlé Purina (Switzerland) – Pet food and care products distributed locally and imported from Nestlé's global production network.
- Real Pet Food Company (Australia / Global) – Wet, dry, chilled and fresh pet foods produced in Australia, New Zealand, China, the United Kingdom, Singapore and the United States.
- Ridley Corporation Limited (Australia / Thailand) – Animal nutrition and feed ingredients manufactured in Australia with some offshore inputs.
- Staughton Group (Australia) – Air-dried treats and wild-game products using mainly Australian raw materials with limited imported proteins and packaging.

Animal Health, Veterinary and Pharmaceutical

- Vetoquinol (France) – Veterinary medicines and animal-health products manufactured in France and Poland.

- Boehringer Ingelheim Animal Health (Germany / Global) – Vaccines and therapeutics for animal health produced through a global manufacturing network.
- Virbac (Australia / France) – Veterinary pharmaceuticals and diagnostics sourced through the company’s international operations.
- Elanco Animal Health (USA / Global) – Medicines, vaccines and nutrition products manufactured under a global contract production model.
- Zoetis (Global) – Animal-health medicines, vaccines and diagnostics manufactured in Australia and imported from international facilities.
- Provet Pty Ltd (Covetrus ANZ, Australia / USA) – Veterinary supplies and technology solutions distributed across Australia and New Zealand through Covetrus’s global network.

Pet Accessories, Toys, Bedding and Consumables

- Comfy Tails LLC (Cozy Tails, USA) – Pet beds and bedding designed in the United States and manufactured in China using certified textiles and foams.
- Diggs Inc. (USA) – Crates, carriers, bowls and accessories designed in the United States and manufactured in China using textile and metal components.
- Happy Pet Group (Exports, UK) – Pet toys, grooming products and accessories primarily manufactured in China.
- KONG Company (USA) – Pet toys and treats produced in both the United States and China.
- TongFu Manufacturing Co Ltd (China) – Contract manufacturer producing pet toys and accessories in China

Vitamins, Supplements and Pet Wellness

Blackmores Group (Australia / APAC) – Vitamins, minerals, supplements and pet-health products under the Blackmores, BioCeuticals and PAW brands, with sourcing across the Asia-Pacific region.

Wholesale, Distribution and Manufacturing Partners

- EBOS Group (Lyppard, Australia / New Zealand / Asia) – Wholesaler and distributor of healthcare, pharmaceutical and animal-care products.
- Masterpet Corporation Ltd (Australia / New Zealand) – Subsidiary of EBOS Group manufacturing and distributing pet food and care products under brands such as BlackHawk and Vitapet.



3. OUR SERVICE PROVIDERS AND PARTNERS

Pet Circle's online operations are supported by a broad ecosystem of service providers that enable the business to function efficiently, scale sustainably, and deliver exceptional customer experiences. These partnerships cover critical operational areas, from logistics and technology to professional services and marketing. Together, they underpin every stage of the business - from product development and order fulfillment to customer engagement and community support.

Core service categories include:

- Freight, warehousing and logistics providers supporting distribution and delivery.
- Recruitment, staffing, and training partners ensuring workforce capability and flexibility.
- Information technology and cloud infrastructure services supporting e-commerce platforms, data security, and internal systems.
- Communications and customer service platforms that enable responsive, omnichannel engagement.
- Waste management, recycling and sustainability partners helping to reduce operational impact.
- Professional service firms providing legal, compliance, financial, and strategic consulting expertise.
- Facilities management services, including cleaning, maintenance, and security.
- Packaging suppliers and design partners ensuring safe and sustainable delivery solutions.
- Hardware and IT equipment providers supporting technical infrastructure and office operations.
- Creative, marketing and design agencies supporting digital marketing, brand development, and promotional content.
- Printing and merchandise suppliers for campaign and event materials.
- Office supply and equipment vendors supporting administrative functions.

- Uniform and staff apparel suppliers maintaining brand presentation and safety standards.
- Payment processing, accounting and software-as-a-service providers supporting transaction, payroll, and reporting systems.
- Event management and community engagement partners that help deliver Pet Circle's outreach and social impact initiatives.



4. OUR MODERN SLAVERY RISKS

Product risks

Modern slavery risks in Pet Circle's supply chain are most likely to exist where long, multi-country sourcing combines with contract manufacturing and seasonal or low-wage labour. Based on widely reported risk patterns highlighted by organisations such as Walk Free and the ILO, exposure tends to cluster in early-tier extraction and processing (agriculture, fisheries, chemicals, metals, pulp), conversion steps (spinning and milling, dyeing and finishing, polymerisation and compounding, plating and coating), and final assembly in high-volume hubs that rely on agency workers and subcontractors with limited transparency.

Across these settings, common indicators can include workers paying recruitment fees or deposits, employers holding identity documents, excessive or unpaid overtime to meet promotions, cash wages with weak records, dormitory housing tied to the job, labour supplied by unlicensed or poorly supervised recruiters, inconsistent factory names or addresses on paperwork, and reluctance to identify second and third-tier suppliers. These patterns are more likely when products are made quickly, at low margins, and across many steps with multiple brokers in between.

Toys, clothing, accessories and bedding

This product category may involve higher-risk material streams and production steps. For cotton and polyester items, risk can arise from farm or feedstock through ginning and spinning (cotton) or polymer and filament production (polyester), then weaving/knitting, dyeing and finishing, and finally cut-and-sew. Wet-processing is often subcontracted and can run extended shifts with limited oversight. Cotton origin can be obscured when fibre is blended or routed through third-country mills, so traceability to the gin and spinning mill may be required to manage exposure. Cotton sourcing has been linked to forced-labour risk in China (including Xinjiang), Turkmenistan, Uzbekistan (historically, with ongoing reform and monitoring),

Pakistan, India and Tajikistan, with additional concerns periodically reported in parts of West Africa, Egypt and Turkey.

For rubber, plastics and metals used in toys, collars, hardware and frames, exposure can sit in natural-rubber tapping and early processing, plastics resin production and compounding, and metal forming and plating. These tiers may rely on temporary or migrant labour and small workshops, where risks such as recruitment fees, long hours and weak worker voice can occur. Finishing steps like electroplating, coating and printing are often outsourced and may be poorly supervised. Pet beds and soft furniture may introduce additional risk through foam supply chains. Chemical inputs, slab foaming and cut-foam conversion can be carried out by workshops that use labour agents to meet peak demand.



Pet food and treats

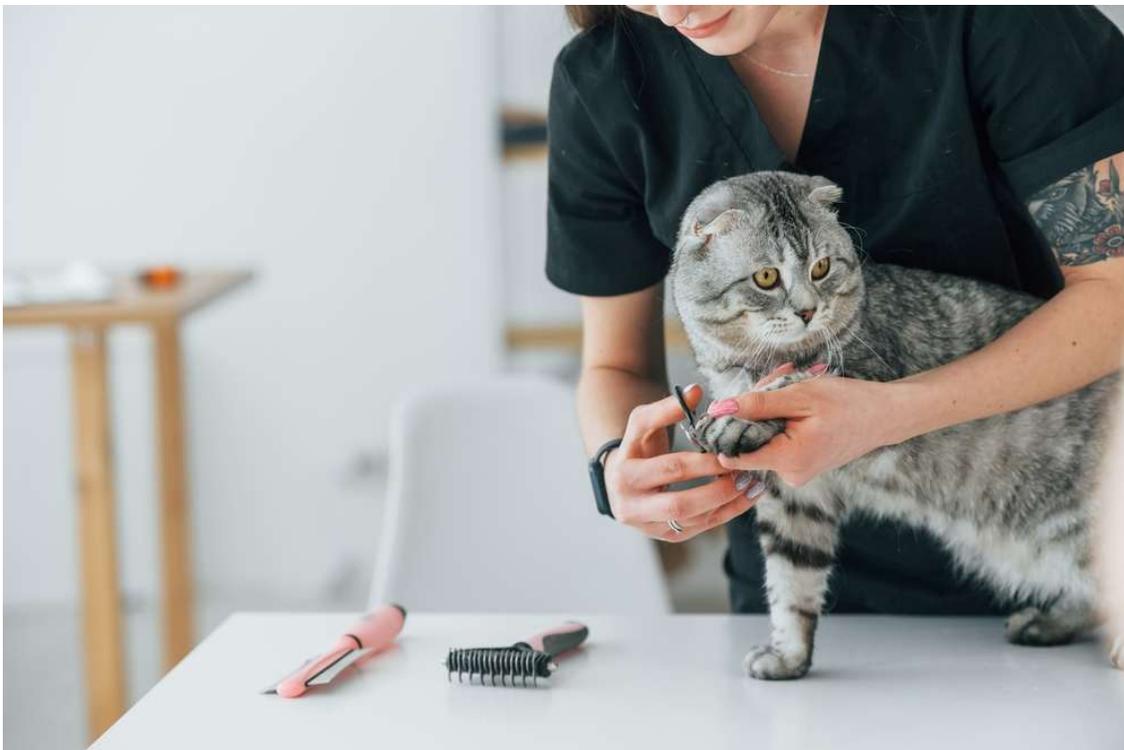
Risks in this category can arise where ingredients pass through many hands or production spans multiple countries. Exposure may occur in slaughterhouses and first-stage meat processing, in seafood catching and on-shore processing for fish, fishmeal and fish oil, and in plant or alternative proteins such as soy, pea, rice and insect where traders, mills and extractors add extra tiers. Vitamins, minerals and other premix additives are often blended from intermediates sourced internationally, which can reduce visibility below the first supplier. Finished products are sometimes made by contract manufacturers serving several brands, and promotional spikes can drive overtime, agency labour and subcontracting at canneries, retort lines and pouch-filling sites. Downstream, chilled and frozen distribution, warehousing and third-party logistics can involve labour-hire arrangements, while cans, pouches and cartons introduce separate chains for metals, films, inks and adhesives that may not be routinely audited.

Supplements, wellness, veterinary and pharmaceutical products

Modern slavery risks exist in relation to this product category because ingredients and packaging move through many steps and countries before a finished chew, capsule, oil or medicine reaches market. Vitamin and mineral premixes etc may be produced via chemical synthesis or fermentation in different locations, then blended or formulated by contract manufacturers that serve multiple brands. Botanical extracts and essential oils can originate with smallholder farms and local processors where labour oversight varies, and solvent-extraction or concentration may be subcontracted. Dosage formats introduce extra tiers (softgels and capsules, gelatin or plant-based shells), gummies and chews, and sterile or liquid fills (specialist fillers). Also primary and secondary packaging (i.e. bottles, caps, pumps, droppers, blisters, films, labels and inks) adds polymer, aluminium and printing supply chains that are often outside routine visibility.

Grooming and pet care products

Risks in this category can exist at several points because ingredients and packaging are drawn from many different supply chains. Palm-based surfactants and emulsifiers may originate on plantations or from smallholders where labour protections vary before being blended into shampoos and sprays. Essential oils and botanical extracts can move through collectors, local processors and traders before reaching a blender or filler, making it harder to see working conditions at early steps. Contract manufacturers and fillers may switch lines or sites to meet promotions, using short-term labour for compounding, filling and packing. Common accessories (e.g. brush handles and bristles, spray triggers, pumps, droppers and nozzles) introduce additional tiers in plastics moulding, springs and small metal parts, as well as printing and labelling. Primary packaging such as bottles, caps, pouches, labels, films and inks adds further suppliers that may sit outside routine checks. Where grooming ranges include towels, wipes or mitts, textile mills and non-woven fabric plants (spinning, dyeing/finishing, converting) add their own upstream exposure.



Litter, hygiene and consumables

Modern slavery risks can arise where production depends on contracted, seasonal or agency labour and long, multi-tier processing. Wood and paper-based litters draw on forestry, pulp and paper converting, where harvesting crews and mill contractors may be hired through labour brokers with uneven oversight. Mineral and silica litters begin with quarrying and basic processing (drying, grinding, grading) that can be split across small operators with limited HR systems and poor record-keeping. Odour-control media such as activated carbon may be made in small kilns from coconut shell, wood or coal before further activation and pelletising, creating early-tier visibility gaps. Absorbent pads, wipes and training mats rely on nonwoven fabric plants and super-absorbent polymers. Across all formats, bottles, films, pouches, labels and inks introduce additional packaging suppliers that may sit outside routine audits, making it harder to confirm labour standards below tier-1.

Hardware, bowls and feeding accessories

Risks can start upstream and persist through many specialist steps. Metals begin with ore mining, then smelting and refining, before rolling, casting and fabrication. In some jurisdictions, state-imposed labour programs and weak protections for minority or migrant workers have been reported in mining and basic metal production. Later steps—stamping, welding, polishing and electroplating—are often split across small workshops that may use agency labour, piece-rates and long shifts, making oversight harder.

Plastics introduce separate chains for petrochemical resins and compounding before injection moulding or thermoforming. In parts of Southeast Asia and the Middle East, factory workforces often depend on migrant recruitment, which can involve fee-charging agents and restrictive workplace practices.

Ceramics rely on clay and silica extraction followed by forming, firing and glazing. In South Asia's brick and ceramics sectors, child labour, debt bondage and seasonal, contractor-managed crews have been documented - risk patterns that can affect ceramic household goods when sourcing overlaps with those hubs.

Where production is dispersed across multiple small facilities for finishing steps (electroplating, coating, printing, label making), supplier records may be patchy and responsibility fragmented among brokers and intermediaries, increasing the likelihood that labour issues go unseen.

Carriers, crates and travel products

Risk in this group can arise because multiple material streams and factory types are involved. Textile parts such as liners, straps and mesh may pass through ginning and spinning (for cotton), or polymer and filament production (for polyester), then weaving or knitting, dyeing and finishing, before final sewing. Wet-processing and sewing are often subcontracted, and extended shifts or seasonal peaks can rely on agency labour.

Plastic shells, clips and fittings depend on petrochemical resins and compounding before injection moulding. These facilities may scale quickly to meet promotions, using short-term workers and shifting orders between plants, which weakens visibility of who performed each step.

Metal frames and hardware require cutting, forming, welding and surface finishing. Finishing steps like polishing, coating and electroplating are frequently outsourced to small workshops where record-keeping, pay practices and oversight can be inconsistent.

Final assembly brings these streams together in high-volume hubs. Time-pressured orders, tiered subcontracting and dormitory style housing tied to employment can increase the likelihood of fee-charging recruiters, excessive overtime and limited worker voice. Traceability below the first supplier is often the challenge, especially when parts are moved to unlisted tier-2 or tier-3 factories to hit deadlines.

Services Risks

Pet Circle's service supply chains can carry modern slavery exposure where high-turnover, time-pressured or subcontracted work is common. Logistics and warehousing, last-mile delivery, cleaning, security, call centres, facilities maintenance, waste management, IT managed services and temporary staffing may rely on labour-hire and migrant workers, layered subcontracting, night shifts and piece-rate pay. These conditions can increase the likelihood of recruitment fees, poor record-keeping, excessive overtime, tied accommodation and limited worker voice. Given these sector dynamics, we treat services as a potential modern slavery risk in the following areas:

Freight and logistics services

Risks in this sector commonly arise where work is subcontracted, time-pressured and migrant-labour dependent. Long-haul road freight, ports, air cargo, rail hubs, cross-docks and large warehouses often rely on layers of contractors and labour-hire agencies. In these settings, workers can be charged recruitment or placement fees, paid cash at piece-rates, rostered excessive or unpaid overtime to meet peaks, or housed in employer-controlled accommodation tied to the job. Driver misclassification (treated as 'independent contractors' without protections), retention of ID documents by intermediaries, and limited access to remedy are recurring issues internationally.

For an e-commerce business with high peak demand, exposure can increase in last-mile delivery and returns handling, where tight delivery windows push work to lower-cost subcontractors, gig-style arrangements or temporary crews with weak oversight. Cold-chain legs and night-shift warehousing add further pressure points. Where freight providers cascade tasks to tier-2 and tier-3 operators, visibility of who actually employs workers and under what conditions can drop quickly, raising the likelihood of modern-slavery indicators in parts of the chain Pet Circle does not directly see.

Labour hire and staffing services

Risk in this sector tends to appear where recruitment and supervision are fragmented across multiple agencies and worksites. Temporary and migrant workers may be recruited through fee-charging brokers, given unclear job terms, or asked to hand over identity documents. Pay risks include below-award rates, unpaid overtime, cash-in-hand practices, unlawful deductions for accommodation or transport, and inconsistent payslips. Operational risks include night shifts and rapid ramp-ups during peak periods, when agencies add second or third-tier subcontractors and move workers between sites with limited oversight. For Pet Circle, exposure is most likely in warehouse, fulfilment and customer support peaks if labour is supplied through layered subcontracting, if rosters and site access are managed by intermediaries rather than the primary employer, or if accommodation and transport are controlled by recruiters. These conditions can reduce visibility of who employs workers and under what terms, increasing the likelihood of debt-related coercion, excessive hours, and limited access to complaint channels.

Information technology (IT) support and maintenance

Exposure is most likely when IT work is outsourced across multiple providers and time zones. Offshore helpdesks, software development and testing, content moderation, cloud management, and 24/7 monitoring often rely on low-paid or temporary staff engaged through layers of subcontractors. Indicators include fee-charging recruiters, long night shifts to cover overseas service windows, unpaid overtime to meet release deadlines, cash or per-ticket pay, weak time and payroll records, and limited access to complaint channels. Work can also be shifted between unlisted second- or third-tier vendors, reducing visibility of who employs workers and on what terms.

Around-the-clock monitoring functions are a particular pinch point. Network operations centre services oversee networks, servers, cloud platforms, databases and applications to keep systems available and performant, while security operations centre services continuously watch endpoints, cloud, identity and networks to detect and respond to threats. Both are

commonly delivered by outsourced, shift-based teams, meaning the same labour-risk patterns noted above can appear in these environments: agency hiring, overnight rosters, overtime pressure and patchy documentation.

Onshore exposure can arise where visa-tied consultants, contractor misclassification, or agency-supplied staff are used in on-site roles. For an e-commerce business dependent on platform reliability, app development and cybersecurity, vulnerability is highest when critical services are offshored or delivered through stacked vendors with limited transparency beyond the first contract.

Communication services

Customer contact work is often delivered through outsourced call centres and business-process providers across multiple time zones. There are reported recurring risk patterns in this sector: fee-charging recruiters and bonded hiring; probationary contracts that roll month to month; low base pay topped up with hard-to-reach incentives; long night shifts to mirror overseas hours; unpaid training or 'nesting'; heavy electronic monitoring tied to penalties; and accommodation or transport controlled by intermediaries. Risk can rise further when peak demand is handled by small subcontractors, when overflow calls are quietly re-routed to second or third-tier centres, or when home-based agents supply services using their own equipment and informal arrangements. For Pet Circle, exposure is most plausible where customer support, live chat, social messaging, or moderation are offshored or spread across layered vendors, making it harder to confirm who employs workers, what they are paid, and whether they can raise concerns safely.

Cleaning services

In Australia, commercial cleaning is often delivered through layered contracting and labour-hire, with work done at night by migrant or temporary crews paid per shift or per site. These models can hide who the real employer is and create blind spots: underpayment of minimum rates, unpaid overtime, cash wages with weak records, deductions for equipment or 'franchise fees', and poor access to grievance channels. Pressure to hit tight KPIs can drive excessive hours and shortcuts on safety and induction, especially when subcontractors change frequently. For Pet Circle, the practical exposure sits with the teams cleaning our warehouses and offices, particularly where a head contractor uses multiple tiers or rapid vendor swaps that reduce visibility of pay, hours, and working conditions.



Waste management and disposal

Collection, sorting, recycling and landfill services are often delivered through long subcontracting chains. Workforces can include temporary, migrant or cash-in-hand workers on night shifts, sometimes hired by brokers or owner-drivers paid per load. Where this happens, pay and hours can be opaque, and workers may face pressure to meet collection targets without proper breaks.

Risk tends to concentrate in manual sorting at transfer stations and materials recovery facilities, in roadside collection and skip-bin operations, and in handling hazardous streams such as chemicals, batteries, e-waste and medical waste. Common problem patterns include inadequate PPE, payroll paid off the books, deductions for uniforms or transport, visa-tied employment, and informal teams operating outside documented contracts. If any part of Pet Circle's waste and recycling is handled by layered vendors or ad-hoc subcontractors, visibility of who employs the workers, how they are paid, and whether safety and grievance processes exist can be limited.

Professional services (legal, financial, consulting)

Although this category is generally lower risk, vulnerabilities can emerge where firms shift routine work to lower-cost back-office centres or freelance platforms. Examples include e-discovery and document review, bookkeeping and accounts processing, tax prep, research, data entry, presentation design, and IT-enabled admin. These tasks may be performed by night-shift teams to match overseas hours, short-term contractors hired through agencies, or home-based workers paid per task. Where this model is used, risks can include fee-charging recruiters, unpaid overtime to meet billable-hour targets, cash or piece-rate pay with weak records, visa-dependent employment, and limited access to independent grievance channels. For Pet Circle, exposure is most plausible if advisers subcontract parts of an engagement to offshore delivery centres or layered vendors without clear disclosure, making it harder to confirm who did the work and under what conditions.

Security services

Security services for Pet Circle – including guarding at fulfilment centres and offices, mobile patrols, alarm response, and CCTV monitoring – can involve long, irregular hours, multi-tier subcontracting, and a high reliance on temporary or migrant workers. These conditions can obscure who the real employer is and how people are paid, increasing the risk of below-award rates, unpaid overtime, cash wages with weak records, document retention, and deductions for licences, uniforms or accommodation. Exposure is greatest during seasonal peaks and at dispersed or after-hours posts where supervision is light and labour may be sourced quickly through brokers or labour-hire.

Packaging materials

Cartons and labels, plastic films and closures, cans and lids, and glass – can draw on forestry and pulp mills, petrochemical resin plants, metal smelting and rolling, and glass furnaces, often spread across multiple countries and subcontractors. Risks may arise where harvesting, mill work or converting rely on agency labour and night shifts, where small printers and laminators use short-term crews, and where recycled fibre, plastics or cullet are collected and sorted through informal or weakly supervised systems. Exposure is most likely below the first supplier, particularly when demand spikes move work to second-tier converters or when components (inks, adhesives, foils) are sourced from small specialist shops with limited transparency.

IT equipment

Electronics used by Pet Circle – laptops, servers, networking gear and peripherals – come through global chains that can include minerals extraction (tin, tungsten, tantalum, gold, cobalt, lithium, mica), contract manufacturing with large shift-based workforces, and tiered component suppliers for batteries, PCBs, displays and power units. Risks may emerge where student or agency labour, dormitory housing and overtime peaks are common, and where visibility drops below the first supplier. Closer to home, rollout and installation work can involve labour-hire crews on night shifts or short-term contracts, creating separate exposure in handling, imaging and after-hours cutovers.

Graphic design and printing

For Pet Circle, risk in this area sits less with in-house designers and more with outsourced production. Commercial printing in Australia often uses layered subcontracting: trade printers handle overflow for retail printers, finishing (cutting, foiling, laminating, binding) is pushed to small workshops, and night-shift crews are brought in during catalogue, promo and peak retail periods. This can involve labour-hire or visa-holder workforces paid piece rates or cash, with limited record-keeping and weak supervision. Supply inputs - paper and board from pulp mills, inks and solvents, foils, plates and adhesives - are sourced through long, international chains where early stages (forestry, chemical processing, aluminium rolling) may rely on agency labour. Design work can also be offshored to low-cost studios or freelance platforms, where long hours, unpaid revisions and delayed or opaque payment terms are common, and subcontracting below the named supplier reduces visibility. Branded merchandise and event collateral (totes, tees, lanyards) add further exposure when blanks are imported from textile hubs before being printed locally.

Office supplies

Beyond everyday stationery, this category reaches into long chains for paper, pulp, inks, plastics and metals. Paper and cardboard trace back to forestry and pulp mills that can rely on contractors and seasonal crews; inks, toners, glues and solvents come from chemical processors with tiered subcontracting; pens, folders, clips and cartridges depend on plastics and metal parts sourced from multiple small component makers. In Australia, the practical exposure for a buyer like Pet Circle is usually below the first distributor - within importers that rebadge generic items, cartridge remanufacturers operating on piece rates, night-shift packing lines, and labour-hire crews used for peak catalogue or back-to-school periods. Furniture and office fit-out items add timber, foam and metal supply chains, plus installers working after hours on short-term contracts.

Uniforms and staff apparel

Apparel combines fibre production, spinning, weaving/knitting, dyeing and finishing, cut-and-sew, and local decoration (screen-printing/embroidery). Risk can arise at any of these stages, particularly where cotton origin is blended and hard to trace, dye houses run extended shifts with agency labour, or stitching is pushed to small workshops paid by the piece. Polyester and elastane introduce petrochemical feedstocks and filament production with opaque subcontracting. In Australia, branded uniform programs often flow through wholesalers that source blanks offshore and then subcontract decoration to small shops; tight deadlines, cash payments, and use of visa-holder workers are known pressure points. Add-ons such as safety footwear, gloves and hi-vis gear bring leather, rubber and plastics chains with separate early-tier risks, while outsourced laundering introduces night-shift crews and labour-hire in industrial laundries.



5. ACTIONS TAKEN TO ADDRESS OUR MODERN SLAVERY RISKS

1. Trade Partner Review – FY25 overview

In FY25 Pet Circle launched an electronic Trade Partner Review to strengthen visibility over Tier-1 suppliers and their labour practices. The review focused on the modern slavery risks most relevant to our product categories and asked suppliers to confirm key controls, disclose high-risk inputs and geographies, and agree to Pet Circle’s Supplier Code of Conduct. Our program is ongoing and we started with a significant portion of Tier-1 suppliers and will continue onboarding new partners and following up where more evidence is needed.

A tailored electronic questionnaire was sent to manufacturers, brand owners, distributors and importers supplying Pet Circle. Suppliers provided business details, nominated an authorised respondent, completed a modern-slavery assessment, and acknowledged the Code of Conduct through an electronic declaration.

The review will be a standing requirement rather than a one-off exercise. Follow-ups are in progress to clarify responses, obtain supporting evidence such as audits or certifications where relevant, and bring remaining and new suppliers into the process.

Snapshot of what we asked our suppliers

Reporting and governance

Suppliers were required to state whether they publish a modern slavery statement (Australia or other jurisdictions), whether any reporting is voluntary, and who inside the business holds day-to-day accountability for compliance and escalation.

Policies and controls

The questionnaire tested foundational safeguards: a modern slavery policy/code; written contracts for all workers; fair wages and working-hours rules (including overtime limits and rest days); anti-discrimination and harassment prevention; a health and safety policy with PPE provision

and training (fire and evacuation included); 'no child labour' and 'no forced labour' policies aligned to ILO standards; nomination of a competent person for chemicals/hazardous substances; an environmental policy; a confidential, accessible worker grievance system; and a prohibition on procuring commercial sexual services.

Risk assessment and subcontracting

Suppliers were asked to describe how modern slavery risks are identified and reviewed in their own operations and deeper tiers, including whether raw-material suppliers undergo risk screening. They also outlined subcontracting controls—when approval is required, how subcontractors are onboarded and monitored, and how any third-party production is disclosed. Any previous cases, concerns or legal findings related to labour rights were to be declared with context and remediation taken.

Workforce and employment practices

Responses profiled the workforce: use of short-term or casual labour, migrant workers (direct-hire or via agencies), overseas students, and service roles such as cleaners, security, call-centre staff, IT contractors and delivery drivers. The review checked for red-flag practices (recruitment fees, document retention, on-site or insecure housing), typical weekly hours, and whether new starters, workers and managers receive training on modern slavery, worker rights and reporting options.

High-risk inputs and origins

Suppliers were asked to list any ingredients linked to elevated risk such as animal proteins and seafood; insect/soy/pea proteins; dairy and egg; palm; textiles and wool; leather and rubber; bamboo/wood pulp; clay/silica; dyes and pigments; plastics and foams; metals; glass; paper/board; feathers/down; hemp/jute; bio-based/compostable materials; activated carbon; essential oils/botanicals; vitamins and minerals. For each, they provided source countries, key processing stages (e.g., fishing, ginning/spinning, polymerisation, plating), and any certifications such as FSC, MSC or Fairtrade, with supporting evidence.

Accommodation and living conditions

Where housing is provided, suppliers were asked to detail how legal standards are checked (fire safety, space, sanitation, ventilation, privacy), and confirmed that workers may leave accommodation freely, can resign without penalty, and receive contracts in a language they understand.

Workplace conditions and safety

The review captured whether work involves higher-risk tasks - heights, underground or confined spaces, hazardous machinery or chemicals, heavy lifting, extreme temperatures, high noise/vibration - and what controls, supervision and training mitigate these risks.

Workers' rights and freedom of movement

Suppliers were asked to affirm non-discrimination and equal opportunity practices, confirm that original IDs or deposits are not taken, recognised freedom of association and collective bargaining, and confirm that all legal wages and entitlements are paid. Any use of forced, bonded, trafficked or prison labour was expressly prohibited.

Response to concerns

Each supplier who received the questionnaire was asked to outline its escalation and remediation pathway if indicators of modern slavery were found - who investigates, how workers are protected, corrective actions, timelines, and how outcomes are verified and reported.

2. Policies and procedures - FY25 update

Overview

Pet Circle maintains a structured policy framework to identify modern-slavery risks, protect worker rights, and guide ethical decision-making across our operations and supply chain. In FY25 we began implementing supplier-facing requirements alongside the Trade Partner Review and strengthened internal awareness for teams involved in sourcing and supplier management.

Modern Slavery Code of Conduct and Supplier Commitment

In FY25 Pet Circle rolled out its Modern Slavery Code of Conduct to Tier-1 suppliers. The Code sets clear, non-negotiable requirements: no forced, bonded or child labour; lawful wages and benefits; working-hours compliance; safe and healthy workplaces; non-discrimination; access to effective grievance channels; and responsible subcontracting with prior approval. Suppliers are required to acknowledge the Code electronically and to cascade these standards to any authorised subcontractors and labour providers.

Whistleblower Policy

Pet Circle provides confidential reporting avenues for employees, contractors and suppliers to raise concerns about unethical or unlawful conduct, including modern-slavery indicators. Reports are triaged through defined procedures, with protections against retaliation and pathways for investigation, remediation and escalation to senior management where appropriate.

Equal Employment Opportunity

Our Equal Employment Opportunity framework commits Pet Circle to fair, merit-based recruitment and employment practices. This reduces vulnerability to exploitation by prohibiting discriminatory hiring, ensuring equal access to opportunities and promoting inclusive workplace culture.

Employee Code of Conduct

The Code of Conduct sets behavioural expectations for all workers engaged by Pet Circle. It requires compliance with applicable laws, respect for human rights, and integrity in business dealings, reinforcing a zero-tolerance stance on exploitation.

Bullying and Harassment

Pet Circle prohibits bullying, harassment and abuse. The policy outlines reporting options, investigation steps and consequences for breaches, addressing power imbalances that can enable coercion or intimidation.

Sexual Harassment

A standalone policy prohibits sexual harassment and establishes clear response and support processes. This ensures a safe environment for all workers and supports early identification of conduct that can sit alongside other labour abuses. Respect at Work Training is also undertaken upon commencement of employment and at regular intervals.

Grievance Resolution

Employees have access to a formal, transparent grievance process with defined timeframes, impartial review and feedback loops. This mechanism enables concerns about workplace conditions or labour practices to be raised and resolved effectively.

Work Health and Safety

Our WHS policy sets minimum safety standards, risk assessments, training and incident reporting obligations across all sites. Maintaining safe work environments reduces the likelihood of unsafe conditions that can heighten vulnerability to exploitation.

Policy content and guidance will continue to be refined through FY26 as we analyse supplier responses, conduct follow-ups and review evidence gathered via the Trade Partner Review. Insights from these activities, together with staff feedback and regulatory developments, will inform updates to our policies, training and supplier engagement approach.

3. Training and awareness - FY25 Update

Modern slavery training was provided via an online module, which the Learning and Development team assigned to our relevant teams. A face-to-face session is planned for FY26.

The online module provided foundational guidance on identifying modern slavery risks in day-to-day work, including recruitment fee concerns, identification document retention, excessive overtime, supplier onboarding questions, and basic evidence checks such as policies, site lists, audit summaries and material origin information.



6. ASSESSMENT OF ACTIONS TAKEN TO ADDRESS RISKS

We plan to judge our effectiveness by three things: whether supplier coverage increases year-on-year, whether the information we receive is specific and verifiable, and whether identified gaps are addressed. In FY25 this centred on the electronic Trade Partner Review, awareness training and collecting supplier acknowledgements of the Pet Circle Supplier Code of Conduct.

FY25 measures

About 65% of Tier-1 suppliers we contacted have completed the Trade Partner Review. Each response captured detail on governance and policies, workforce profile (use of casual/migrant labour, hours, training), subcontracting controls, high-risk inputs and geographies, and any incident history. Suppliers provided an electronic acknowledgement of the Pet Circle Code of Conduct, which was filed with their submission. Quality gaps – such as limited visibility of lower-tier processors, unclear subcontracting arrangements, or missing origin evidence for higher-risk materials – were logged, triaged, and followed with targeted document requests. Head-office staff are also required to complete practical modern-slavery awareness training, with scenario checks to confirm understanding.

Key insights

Coverage of respondents was solid, but additional depth is needed in categories that often have complex tiers – textiles, rubber and plastics, metals finishing, palm-based inputs, seafood, and packaging substrates. The most common weaknesses were subcontracting transparency and traceability to origin for declared high-risk inputs.

Program adjustments

Non-responding and newly onboarded suppliers are being asked to complete the Trade Partner Review, with open items tracked until closure. Where high-risk inputs or geographies are declared, tailored document requests will be issued where this is practical. Work is underway on a simple intake step so new suppliers can acknowledge the Supplier Code of

Conduct and complete the review on onboarding. Buyer guidance and internal checklists are being refreshed to reflect the most frequent FY25 flags.

FY26 assessment plan

We will contact any Tier-1 supplier that has not completed the Trade Partner Review and require completion. For all completed reviews, we will follow up on issues of concern until they are resolved or appropriately mitigated.

Methods and assurance

Results are compiled from the electronic review system, supplier correspondence, and document assessments. Spot-checks compare supplier declarations to supporting evidence to confirm accuracy and file quality.



7. MOVING FORWARD

Governance and leadership

We will keep the modern slavery working group in place and provide the Executive Leadership Team with short, regular updates. These will summarise supplier review progress, any new risk signals in our categories or sourcing regions, and practical decisions needed (for example, extra evidence requests or pausing onboarding until basic checks are met).

Supplier Code of Conduct

We will continue the Code rollout and record an acknowledgement for each active supplier. Where a supplier handles higher-risk inputs or geographies, we will ask for straightforward evidence (such as how subcontracting is controlled and where key materials originate) and store that alongside the acknowledgement so our buying teams have it in one place.

Training and tools

Head-office teams will receive refreshed, practical awareness training. The emphasis will be on everyday actions: what to look for in questionnaires, when to ask for follow-up documents, and how to escalate concerns. We will provide short checklists and examples so teams can apply the training immediately.

Trade Partner Review

The electronic Trade Partner Review will continue with product suppliers and expand to services suppliers. Our near-term focus is closing the gap with non-responders and tidying open items.

Monitoring and external signals

We will remain aware of any changes to Australian reporting requirements and reputable external alerts, using these to keep our program current. Where an alert is relevant to our categories, we will update the review form or ask for targeted clarification from affected suppliers.

Private label focus

For Pet Circle own-brand products, we will keep building basic visibility of manufacturing sites and key material origins where practicable. We will confirm acknowledgement of the Supplier Code of Conduct and request clarifications on any higher-risk elements identified in the review.

Factory visits for Private label

In FY26 Pet Circle will introduce targeted factory visits for higher-risk Private Label products and geographies. Visits will verify who makes our goods, check for unauthorised subcontracting, review basic records and safety practices, and include confidential worker conversations. We will document findings, link them to each supplier's file, and follow up where issues are identified. This practical step adds ground-truth visibility and supports safer, more transparent production for our private brand.

