

4 December 2024

To whom it may concern

Modern Slavery Statement 2024

A. Introduction

1. Zoetis Australia Pty Limited ACN 156 476 425 and Zoetis Australia Research & Manufacturing Pty Limited ACN 158 433 053 (together, Zoetis) are reporting entities within the meaning of the *Modern Slavery Act 2018* (Cth) (**Act**).
2. On 30 September 2022, Zoetis acquired 100% of the issued share capital of Betrola Investments Pty Ltd, including its wholly owned subsidiary Jurox Pty Limited ACN 000 932 230 (**Jurox**) and this statement also covers that business.
3. This joint Modern Slavery Statement is submitted by the entities comprising Zoetis in accordance with section 14 of the Act for the period between 1 July 2023 and 30 June 2024 (**Reporting Period**). For ease of reference, Zoetis and Jurox together are referred to as “we” or “us” in the remainder of this joint Modern Slavery Statement.
4. This is the fifth annual Modern Slavery Statement submitted by Zoetis and the second annual Modern Slavery Statement incorporating Jurox.

B. Background

5. We remain committed to complying with all laws and regulations applicable to its operations. This includes being resolutely opposed to modern slavery, in all its forms, and being fully supportive of the Universal Declaration of Human Rights.
6. The acquisition of Jurox by Zoetis has required the extension of the Zoetis policies and procedures, including the express commitment to good corporate citizenship and respect for human rights (including the Universal Declaration of Human Rights) to Jurox. The integration of Jurox into Zoetis’ compliance structures is ongoing.

C. Structure, operations and supply chains of the reporting entities

Structure

7. The two reporting entities submitting this joint Modern Slavery Statement are wholly owned subsidiaries of their ultimate parent company, Zoetis Inc which is listed on the New York stock exchange and is the world’s largest producer of medicine, vaccine, diagnostic, biodevice and genetic goods and services for pets and production animals, including fish (**Products**).
8. Members of the Zoetis Inc group sell the Products in more than 100 countries. During the Reporting Period, Zoetis Inc’s manufacturing network comprised 28 sites in 11 countries. Each Zoetis manufacturing site is designed to meet chemical and infectious agent safety regulatory requirements. Some manufacturing facilities are sometimes co-located with research and

development operations which allow new products to be developed and rigorously tested before then moving to commercial production.

9. In September 2022, Zoetis Inc completed its acquisition of Jurox, which formulates, manufactures, and distributes companion and commercial animal health Products principally manufactured and developed from its production facility in Rutherford, New South Wales. Jurox's Products are distributed in approximately 22 countries worldwide, including Australia and the United States.
10. In Australia, Zoetis Inc, through its wholly owned subsidiaries, is comprised of:
 - a. Zoetis Australia Pty Limited, which is Zoetis' primary 'commercial' function, handling areas including Product sales, distribution, marketing, personnel, and operations;
 - b. Zoetis Australia Research & Manufacturing Pty Limited, which has two principal functions; (1) a research function (part of the global research and development function known as Veterinary Medical Research & Development or VMRD), and (2) a manufacturing function (part of the global manufacturing and supply function known as GMS); and
 - c. Jurox, which has historically engaged in a range of functions including research and development, manufacturing, marketing, sales and operations.

Supply chains

11. Zoetis' supply chains are comprised of:
 - a. Zoetis Inc and its subsidiaries, which is its largest supplier; and
 - b. various domestic and international suppliers.
12. Jurox has maintained its own discrete supply chain which consists of domestic and international suppliers (including some based in China, India, Taiwan and Mexico). As foreshadowed in our previous report, the modern slavery risk assessment processes adopted in the previous reporting period and outlined in this statement, were applied to Jurox suppliers in the current Reporting Period.
13. All Zoetis businesses in Australia are subject to the global supply policies implemented by Zoetis Inc. With regard to supplies by Zoetis Inc. to Zoetis' Australian businesses, Zoetis relies on Zoetis Inc's global policies in relation to modern slavery compliance. Zoetis Inc, has a dedicated compliance function, including an internal audit team.

Zoetis' Global Corporate Compliance Program

14. Zoetis Inc has implemented global ethical policies with respect to slavery, ethics and human rights under its global Corporate Compliance Program. As a wholly owned subsidiary, Zoetis is bound by the policies implemented by its parent company and can access global resources administered by Zoetis Inc. Zoetis is also reliant upon these policies in relation to international supply managed by Zoetis Inc.
15. Zoetis Inc's primary applicable supply policy is the Corporate Compliance Program, which contains several important mechanisms and policies relevant to modern slavery compliance. Some of those mechanisms and policies, which we explain below, include the:
 - a. Global Code of Conduct (**Global Code**);
 - b. Global Compliance Helpline; and
 - c. ongoing live and online compliance education program (**Education Program**).

16. Firstly, the Global Code details Zoetis Inc's (and therefore Zoetis') corporate philosophy and prescribes non-negotiable, minimum standards of compliance which applies to all its suppliers. The Global Code:
- a. prescribes its compliance structures, applicable laws and procedures that govern Zoetis Inc's approach to ethical conduct;
 - b. identifies applicable laws and the underlying corporate principles and ethics common to all 'Zoetis group' companies;
 - c. provides an express statement with respect to Zoetis' commitment against modern slavery, child labour, human trafficking, and forced labour; and
 - d. outlines Zoetis' global ethical stance, including with respect to anti-bribery and corruption, its supporting equal opportunity and being against workplace bullying/violence.
17. Secondly, Zoetis has a *Global Compliance Helpline* which is a confidential whistle-blowing resource that allows employees globally to report on possible violations of Global Code, corporate policies or procedure or any applicable laws, rules or regulations as determined by country of operation. This is supplemented by local whistle-blower protection policies for eligible disclosures related to Australia. The Global Compliance Helpline:
- a. maintains an "Open Door Policy" which encourages employees to raise concerns to any supervisor, manager or relevant department, without fear of retaliation;
 - b. provides a means for employees to obtain information or receive advice anonymously; and
 - c. is operated by third party ethics and compliance representatives, which provide summaries of all reported calls to the Chief Compliance Officer for assessment or any other appropriate further action. Zoetis Inc's Chief Compliance Officer is responsible for overseeing the compliance with the Corporate Compliance Program. Part of the Chief Compliance Officer's role includes responsibility for training, monitoring systems, developing international resources, and investigating potential violations of company policy or applicable laws.

Staff who are found to have committed a breach of company policy or applicable laws are held accountable through disciplinary action, which may include dismissal.

18. Thirdly, Zoetis' ongoing live and online compliance education program (**Education Program**) ensures that all employees have access to an intranet site which contains the company's global policies, including the Global Code. On some subjects, all Zoetis Inc employees (including contingent workers or contractors) are required to complete online annual training and additional specific training as warranted.

Jurox

19. Jurox's global head office is situated in the Hunter Valley Region of New South Wales, Australia. Its regional offices are situated in Auckland, New Zealand; Crawley, UK; Kansas City, USA; and Vancouver Island, Canada.
20. Globally, Jurox employs staff in a number of different divisions including: Research and Development, Administration, Customer Service, Digital Design, Engineering and Maintenance, Quality, Finance, Information Technology, HR, Manufacturing and Production, Marketing, Regulatory, Sales, Supply Chain, Technical Services, and Veterinarians.
21. All of Zoetis' policies, including its Modern Slavery Policies outlined in this Joint Statement, apply to Jurox. A copy of Zoetis' 'Supplier Standards Code of Conduct' is available publicly on Jurox's website.

D. Risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls

22. In the Reporting Period, Zoetis engaged seven new suppliers in its engineering and GMS sectors. Due diligence was conducted on all seven suppliers, with each being assessed against Modern Slavery criteria. This review indicated that all seven suppliers presented a “low risk” of engaging in Modern Slavery practices. Nonetheless, Zoetis sent copies of its Modern Slavery Questionnaire (none of which were returned) and a copy of Zoetis’ *Global Code of Conduct* (discussed at paragraph 16) to those new suppliers.
23. Given Zoetis’ operations in R&D and production, the majority of suppliers engaged are either utilities or professional service-providers hired on an *ad-hoc* basis. The nature of these services includes, among others, telecommunications services, employment and recruitment services, and clinical trial services. Zoetis has assessed most of its service-based suppliers as having low risk in relation to modern slavery.
24. Details of the risk-assessment process are outlined below.

Risk Assessment and Screening of Suppliers

25. In association with our legal advisors, we have created a process for assessing the risk posed by our suppliers in relation to modern slavery practices in our operations and supply chains (Risk Assessment). In this Reporting Period:
- a. Zoetis has continued to apply Risk Assessments of new and existing suppliers over the Reporting Period; and
 - b. Jurox has implemented Zoetis’ Risk Assessment methodology internally.
26. By way of overview, our Risk Assessment process now involves:
- a. compiling an exhaustive list of suppliers across both Zoetis and Jurox;
 - b. conducting an initial risk assessment of our suppliers by applying risk based criteria against each supplier, including location and operation, and the nature of the industry in which they provide goods and services;
 - c. screening all suppliers through the World-Check record, which is a database run by Refinitiv (a subsidiary of Thomson Reuters) in its capacity as one of the world’s largest providers of financial markets data and infrastructure (**Refinitiv Screening**); and
 - d. categorising each assessed supplier into low, medium, or high-risk suppliers.

We step through each process of the above Risk Assessment process below.

Step 1: Mapping our supply chains

27. In mapping our supply chains, we compiled an exhaustive list of suppliers across each department and function of both Zoetis and Jurox. In the Reporting Period, we engaged in excess of 250 suppliers in total, including suppliers that are Zoetis related bodies corporate.

Step 2: Applying our risk assessment criteria

28. We are committed to ensuring that our business considers the diverse factors which may inform risks of modern slavery practices. We set out some factors which we consider in applying our risk assessment of suppliers as follows.
29. Firstly, we recognise that **geography** has a material impact on any supplier’s modern slavery risks. These risks may be informed by, among other things:

- a. the extent to which the supplier's geographic location is subject to, has implemented, or enforces, international human rights and instruments;
 - b. whether, and to what degree, the supplier's geographic location has implemented, and enforces, domestic human rights legislation;
 - c. the degree of regulatory transparency in the supplier's geographic location with respect to human rights violations, the rule of law, and corruption; and
 - d. whether the supplier's jurisdiction is subject to known conflict, corruption, or civil strife.
30. Secondly, we recognise that the **industry** in which the supplier operates will contribute to the risk of modern slavery practices in that supplier's operations or supply chains. These risks may be informed by, among other things:
- a. the existence of any labour laws applicable to that industry of operation;
 - b. the strength and degree of any regulatory oversight with respect to that industry;
 - c. whether the relevant market is known for use of unskilled, seasonal, or temporary labour, or the engagement of migrants or any vulnerable communities;
 - d. whether the products produced by that supplier, or in that industry, may be sourced or derived from components or materials obtained from other industries with ineffective or non-existence regulations;
 - e. whether that particular industry has been subject to any international reviews, discussion papers, or coverage, published by any NGOs, or international human rights bodies, with respect to human rights violations.
31. Thirdly, we recognise that the **size** of a supplier may play a role in the degree of modern slavery risk presented by a supplier. This metric acknowledges that, generally, smaller suppliers may be susceptible to modern slavery risks due to less interaction with governance or regulatory bodies, with less exposure to detection.

Step 3: Categorising each supplier into tiers of risk

32. Most of Zoetis' suppliers engaged are either:
- a. professional service-providers hired on an ad-hoc basis;
 - b. research facilities and clinical trial service providers; or
 - c. utilities-providers used in the manufacture, storage, or transport of the Products.
33. From Zoetis' risk assessment, Zoetis concluded that most of its service-based suppliers present a low risk in relation to modern slavery because:
- a. many of these service-based providers are located in regions subject to regulatory and legal oversight, domestic human rights legislation and/or international human rights regimes, including Australia, the United States, Switzerland and Belgium; and
 - b. the services supplied typically exclude the use of unskilled, temporary, or seasonal labour and are primarily of a technical or corporate nature, such as telecommunications services, employment and recruitment services, and clinical trial services.

Step 4: Refinitiv World-Check Screening

34. During this Reporting Period, we further expanded the scope of our Risk Assessment to include screening our suppliers through the World-Check record, which is a database run by Refinitiv (a subsidiary of Thomson Reuters) in its capacity as one of the world's largest providers of financial markets data and infrastructure (**Refinitiv Screening**). The Refinitiv database platform is a comprehensive risk intelligence tool used to screen and monitor entities for their risk profiles, amongst other things. We ran our list of external suppliers through the World-Check database.

35. The World-Check database contains millions of profiles of entities gathered from public sources and proprietary research that is continually updated for accuracy. Crucially, the database turns up details of any adverse media, criminal activities, or reports of Modern Slavery against each entity searched through the platform. In addition, the platform runs our supplier list against information from global sanctions lists, law enforcement agencies, and regulatory bodies, which assists Zoetis to identify suppliers that may be subject to sanctions or other legal restrictions.
36. The Refinitiv Screening produced two key metrics to assist Zoetis' assessment of the Modern Slavery exposure posed by our supply chain, being the modern slavery Risk Matrix, and the World-Check Results the findings of which are detailed below:
- a. **Modern Slavery Risk Matrix.** The Risk Matrix flagged:
 - i. one supplier situated in a geographic location marked as 'high risk' (India). However, considering all the circumstances, including that the industry in which the supplier operated is considered low risk and that the World-Check Results did not turn up any adverse results against that supplier, we assessed that this supplier did not pose a high modern slavery risk to Zoetis' supply chain;
 - ii. four suppliers were marked as having a 'moderate risk' of Modern Slavery activity based on their respective geographic locations (China, Mexico City, and Singapore). We note however, that World-Check Results did not turn up any adverse findings against these four suppliers, and our assessment of these suppliers overall is that they do not pose a high modern slavery risk to Zoetis' supply chain;
 - b. **World-Check Results.** The World-Check Results identified that the modern slavery risk level for one supplier was 'moderate' because of adverse reports regarding Labour Rights Violations in February 2023. The report shows that because of those violations, the supplier has signed an Enforceable Undertaking with the Fair Work Ombudsman to back pay AUD 4.8 million to the underpaid employees after they failed to comply with a Compliance Notice. In this regard, Zoetis considers that the supplier is remedying this violation on an ongoing basis. Zoetis will monitor this supplier over upcoming Reporting Periods and continue to assess their compliance activities.
37. In this regard, the Refinitiv Screening results show that almost all Zoetis' supply chain poses a low risk of exposure to Modern Slavery. To the extent that five suppliers were flagged in the Risk Matrix, our assessment of the overall factors for each supplier has led to the conclusion that the Modern Slavery risk profile is low. Further, the one supplier flagged in the World-Check Results will continue to be monitored by Zoetis across successive Reporting Periods. Overall, the Refinitiv Screening did not highlight any public ethical or compliance issues with regard to our supplier database.
38. We acknowledge that assessing modern slavery risks requires an informed and multi-faceted approach that should be able to consider the particulars of each supplier, guided by an overarching understanding of the various factors which influence modern slavery. We considers that the addition of the Refinitiv Screening adds another facet to our multi-pronged approach to assessing our supply chain for exposure to modern slavery practices.
39. Over successive Reporting Periods, we intend to continue considering:
- a. how we may be further allocate greater scrutiny and attention to higher-risk suppliers; and
 - b. any suppliers flagged by the Refinitiv screening process currently being rolled out by Zoetis.

E. Actions taken to assess and address risks, including due diligence and remediation processes.

40. During the Reporting Period, Zoetis actively engaged in a range of compliance activities to assess and address modern slavery risks in its supply chains, as detailed below.

Modern Slavery Bulletins

41. On 17 June 2024, Zoetis sent out a company-wide email to all staff to raise internal awareness Zoetis' Modern Slavery obligations under the Act. Specifically, this correspondence:

- defined modern slavery and described its various forms;
- explained Zoetis' statutory obligations under the Act;
- reinforced Zoetis' resolute position against modern slavery practices;
- explained that Jurox operations have been incorporated into modern slavery operations for Zoetis;
- directed staff and provided hyperlinks to Zoetis' Global Code of Conduct and the Australian Supplier Code of Conduct; and
- encouraged staff to report any potential or known instances of modern slavery practices within the Zoetis supply chain to the Global Compliance Helpline.

42. On the same date, Zoetis circulated a slightly different version of the correspondence to the former Jurox staff that was slightly varied to reflect the transitional period.

43. Through disseminating these informative bulletins, we intend to further engender an organisational culture within the business that is aware of modern slavery practices and committed to facilitating compliance with the Act.

Modern Slavery compliance meetings

44. Our cross functional management team for modern slavery risks, which includes its senior management team and Senior Legal Director, conducts an annual review of modern slavery compliance within Zoetis and Jurox (**Modern Slavery Compliance Committee**). This management team has convened these annual modern slavery compliance meetings since Zoetis' first Reporting Period under the Act.

45. This team met on 31 May 2024 to assess the status of its various compliance activities and policies and consider what further actions could be implemented over future Reporting Periods. The Modern Slavery Compliance Committee has allowed us to open channels of communication across our internal functions and assess the effectiveness of measures we have implemented.

46. Following Zoetis' acquisition of Jurox, Zoetis and Jurox established internal contact points to liaise on all issues of modern slavery. During this Reporting Period, we continued to ensure that Zoetis' approach to modern slavery compliance was applied to Jurox' supply chain to ensure we apply a consistent and uniform approach to reducing modern slavery risk.

Modern Slavery Questionnaire

47. During the Reporting Period, we conducted a risk of assessment of its new and existing suppliers and sent out a Modern Slavery Questionnaire to seven new suppliers and two existing suppliers which were assessed as having a higher risk than other Zoetis suppliers. Both existing suppliers responded by the end of the Reporting Period. On review of the responses, Zoetis was satisfied that no further action was required in relation to Modern Slavery based on those responses. The new suppliers that did not respond in the Reporting Period will be followed up in the next Reporting Period so these responses can be properly assessed.

48. The Modern Slavery Questionnaire contains 21 questions designed to assess that responding supplier's human rights and labour standards and required responding suppliers to report on the actions that the responding supplier has undertaken to prevent or address modern slavery risks in their business or supply chains.

Australian Supplier Code of Conduct

49. To supplement the Zoetis Inc's Global Code, Zoetis introduced an Australian Supplier Code of Conduct (**Australian Code**) during the 2021-2022 Reporting Period and posted it on Zoetis' website. The Australian Code highlights Zoetis' corporate values and prescribes the non-negotiable, minimum standards to which Zoetis expects all suppliers to adhere.
50. Following Zoetis Inc's acquisition of Jurox, Jurox adopted the Australian Code and posted a copy of that Australian Code on the public facing Jurox website. Jurox's adoption of the Australian Code is one example of the continuing alignment of values between Zoetis and Jurox.
51. The Australian Code makes express reference to the Act and details our corporate commitment to compliance under the Act and our requirements of suppliers. Some of these requirements include the promotion of compliance among each supplier's own supply chains, and the requirement to report any instances of non-compliance to us.
52. Under the Australian Code, Zoetis reserves the right to terminate any agreements or business relationships if suppliers or contractors contravene the provisions contained in the Australian Code.

F. Assessing the effectiveness of such actions

53. The quality control process for procurement is well established and supported by audits, either by external regulators or Zoetis's own internal audit team. This quality control process is now available to Jurox as a recent addition to the 'Zoetis group'.
54. Over the coming Reporting Periods, Zoetis and Jurox will continue to assess, on an ongoing basis, further means by which Zoetis and Jurox may implement proactive steps in detecting, remedying, and combatting any modern slavery practices in their, or their suppliers', supply chains and operations.

G. Process of consultation with any entities that the reporting entity owns or controls

55. As set out in paragraph 7 of this Modern Slavery Statement, both the Reporting Entities are wholly owned subsidiaries of their ultimate parent company, Zoetis Inc. As we are all part of the 'Zoetis group', we have made active attempts throughout this Reporting Period to cross-integrate our policies, systems and processes. This has included establishing specialised contact points in Zoetis and Jurox for all modern slavery-related matters, the application of Zoetis policies at Jurox, the inclusion of Jurox staff on all Zoetis compliance processes, application of Zoetis procurement processes to Jurox, and consultation in the preparation and finalising of this Modern Slavery Statement. Further, a Jurox representative is included in the Modern Slavery Compliance Committee and attends the modern slavery compliance meetings.
56. As Zoetis and Jurox continue this process of integration over successive Reporting Periods, it is intended that these lines of dialogue and consultation will allow Zoetis and Jurox to apply a consistent approach to combatting modern slavery. Over the coming Reporting Periods, we intend to build on these actions to further unify our Modern Slavery compliance approach across Zoetis and Jurox.

H. Conclusion

57. We are continually assessing how we can develop and enhance our policies with respect to modern slavery. The acquisition of Jurox presents a meaningful opportunity for the Reporting Entities authoring this joint Modern Slavery Statement to share and consolidate their approaches.
58. Our focus in the current Report Period was implementing the Refinitiv Screening as part of our risk assessment process when reviewing and assessing our suppliers for Modern Slavery risk. This has provided further objective data to inform the existing supplier Risk Assessment process.
59. Zoetis and Jurox are committed to the implementation of its anti-slavery policies and collaborating with all suppliers in order to eliminate any potential risk of modern slavery in our supply chains and operations. We are proud of the progress achieved during this Reporting Period and acknowledge that the fight against modern slavery is ongoing.
60. This statement was created at the direction of the boards of each of the reporting entities covered by this statement. The boards gave that direction and the report was completed and approved by each reporting entity in December 2024. The below signatory is a member of the board of both the reporting entities and is signing in this capacity.

Yours sincerely



Lance Williams
Director