



Anti-Modern Slavery Statement

For the year ending 30 June 2024

PetSure 

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We encourage anyone with concerns about modern slavery or any other aspect of our business to speak up by contacting our Chief Executive Officer or our independent, confidential and secure whistleblower service.

Details are available on our website petsure.com.au.

About PetSure and this Statement

PetSure is dedicated to advancing measurable, sustainable social impact through a clear, actionable strategy and commitment to transparent progress. As we listen to and align with growing stakeholder expectations, we are actively implementing steps to create meaningful shared value that benefits our business and the communities in which we operate.

PetSure is the only standalone general insurer in Australia dedicated to pet insurance, underwriting more than 80% of the Australian market, and helping to cover the veterinary treatment costs of more than 4,000 dogs and cats every day. We are also a pet health technology organisation working across a portfolio of aligned businesses, to make a meaningful difference in collaboration with others in our sector.

This Anti-Modern Slavery Statement (Statement) is made pursuant to section 14 of the Commonwealth Modern Slavery Act 2018 (the Act).

This Statement is made on behalf of PetSure Holdings Pty Ltd (ACN 606 792 509) (PetSure Holdings) and PetSure (Australia) Pty Ltd (ACN 075 949 923) (PetSure) as joint reporting entities, collectively referred to in this Statement as PetSure.

This Statement covers all entities that make up the PetSure group during the reporting period 1 July 2023 to 30 June 2024.

The assessment of modern slavery risks in PetSure's supply chain, as described in this Statement, includes suppliers procured by PetSure on behalf of its subsidiaries and by the subsidiaries themselves.

All dollar figures presented in this Statement are in AUD.

Our Values and Standards

Our values articulate the behaviours we expect of each other at PetSure and are the foundation of our culture. We have passion for pets and their people, we chew through problems and opportunities, we are curious about every pawsibility and we take care of each other. Developed by our employees, our values highlight that, how we do something is just as important as what we do.

Further information on our values and standards can be found in our Code of Conduct which is available on our website.



CEO's Message

We are proud to submit PetSure's second Anti-Modern Slavery Statement as a separate reporting entity under the Act.

As a responsible and ethical business, we recognise the significant harm and injustice caused by modern slavery to vulnerable people around the world. We are committed to making sure that no such exploitation exists within our operations and supply chain.

We strive to assess and address modern slavery risks and vulnerabilities across our operations and supply chain and to provide accessible and safe grievance channels and remedy pathways to people touched by our operations.

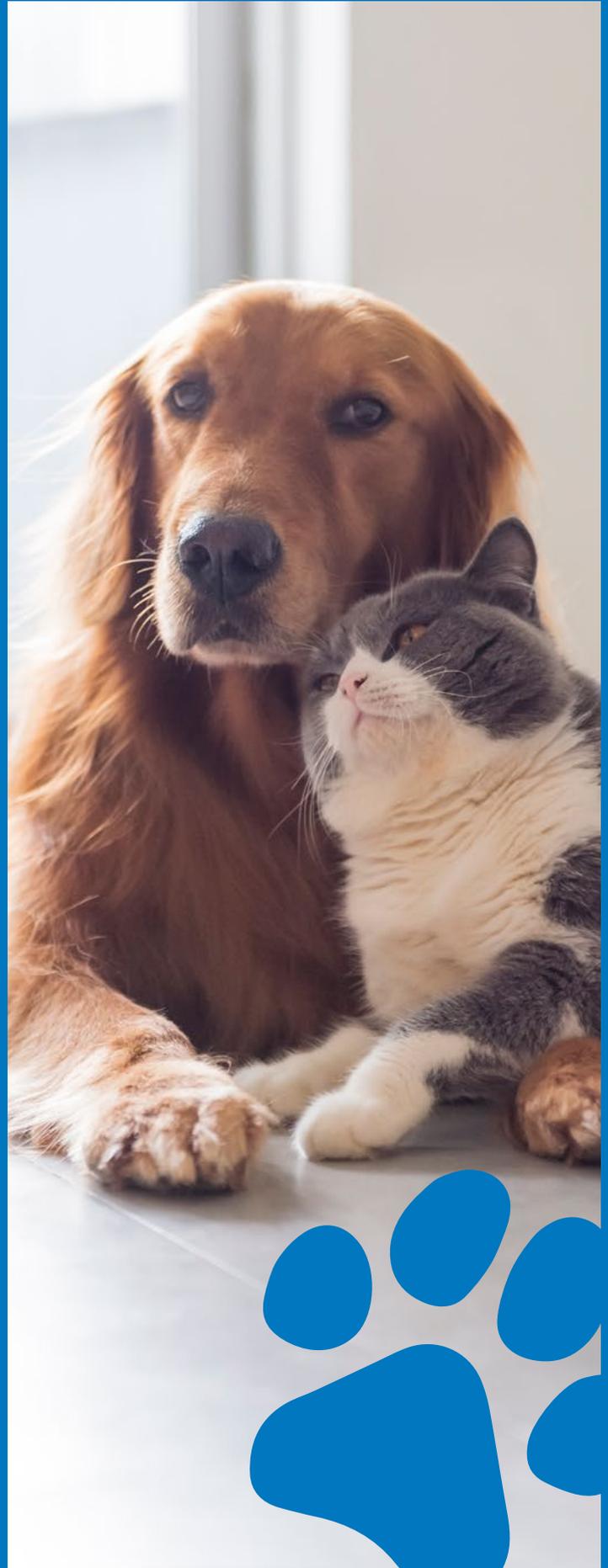
This Statement outlines our approach to identifying, preventing, and addressing modern slavery risks and describes the practical steps we are taking to continuously improve.

Our goal is to ensure that all people involved in our operations and supply chain are treated fairly and with respect, and that our business practices uphold the highest standards of ethical conduct.

We appreciate the ongoing commitment of PetSure's Anti-Modern Slavery (AMS) Working Group in continuing to review our key risk areas, encouraging awareness and implementing our action plan and roadmap.

The Statement was approved by the PetSure Board, as the principal governing body, in December 2024.

Alex Thomas,
CEO and Managing Director



Our Pathway of Continuous Improvement

During FY24, we continued to learn from our experiences and considered internal and external feedback to enhance our approach. We worked to strengthen governance and risk management and engaged and educated our workforce and priority suppliers with the objective of ensuring continuous improvement. While we are proud of our achievements to date, we acknowledge that ongoing focus is needed to assess and mitigate our extended supply chain risks.

 Strengthening Governance	 Engaging and Educating	 Continuous Improvement
<p>We do this through:</p> <ul style="list-style-type: none"> Policy reviews and updates AMS Working Group Integration of anti-modern slavery initiatives into risk management frameworks <p>FY24 Highlights</p> <ul style="list-style-type: none"> Strengthened anti-modern slavery content in Board and Committee Charters and three company policies Maintained anti-modern slavery momentum through three Working Group meetings Designed an anti-modern slavery Supplier Due Diligence program, Procurement Risk Assessment process and Supplier Expectations Matrix to align with contract clauses <p>Future Activities</p> <ul style="list-style-type: none"> Refresh our Code of Conduct Enhance effectiveness of the AMS Working Group 	<p>We do this through:</p> <ul style="list-style-type: none"> Internal training and capability building Board and senior leader consultation and engagement Engagement and support <p>FY24 Highlights</p> <ul style="list-style-type: none"> Engaged 60% of employees in Australia and South Africa to complete voluntary online anti-modern slavery learning and assessment Enhanced engagement with the Board and senior leaders by integrating anti-modern slavery within PetSure's sustainability strategy, governance and reporting Engaged our highest priority suppliers through a due diligence assessment <p>Future Activities</p> <ul style="list-style-type: none"> Identify opportunities to integrate anti-modern slavery into sustainability related communications Enhance engagement with highest priority suppliers 	<p>We do this through:</p> <ul style="list-style-type: none"> Program and process self-assessment reviews System Improvement and enhancement Annual supplier prioritisation <p>FY24 Highlights</p> <ul style="list-style-type: none"> Independently assessed our Statement for the year ending 30 June 2023 against ACSI recommendations¹ Enhanced anti-modern slavery clauses within service provider contracts Improved supplier prioritisation methodology and process <p>Future Activities</p> <ul style="list-style-type: none"> Integrate anti-modern slavery actions into supplier and operational systems, processes and monitoring activities Integrate anti-modern slavery into overall evolving of service provider management <p><small>¹ Refer to ACSI reports: Moving from Paper to Practice (2021) and Compliance without Ambition (2023)</small></p>

Our Structure, Operations and Supply Chain

Our Structure

PetSure Holdings is authorised by the APRA as a Non-Operating Holding Company and is the parent entity of the Level 2 Insurance Group. PetSure Australia is the APRA-authorized Level 1 general insurance entity. PetSure Australia is wholly owned by PetSure Holdings. In March 2023, APRA granted PetSure Australia a general insurance licence.

PetSure specialises in product design, pricing and high-volume policy administration and claims management with offices in Sydney, Australia and Johannesburg, South Africa (PetSure Services South Africa).

PetSure Services South Africa domiciled in South Africa, primarily provides claims and IT support to PetSure's operations in Australia.

PetSure's operations are supported by a controlled joint venture, PetSure Services Inc (PSI), domiciled in the Philippines, is considered a material offshore outsource service provider of claims processing, customer service and technology support.

Pet Insurance Pty Limited is our direct pet insurance distribution business, under the brand name of petinsurance.com.au. As such, its primary business activity is the marketing and distribution of pet insurance.

PetSecure Pty Ltd is a dormant entity and historically held a direct pet insurance distribution business under the PetSecure brand.



For the year ending 30 June 2024, PetSure directly employed 327 people in professional and support roles, 278 of whom are based in Australia and 49 of whom are based in South Africa. PSI directly employed 501 people, 315 of whom support PetSure and the remainder support other global clients.

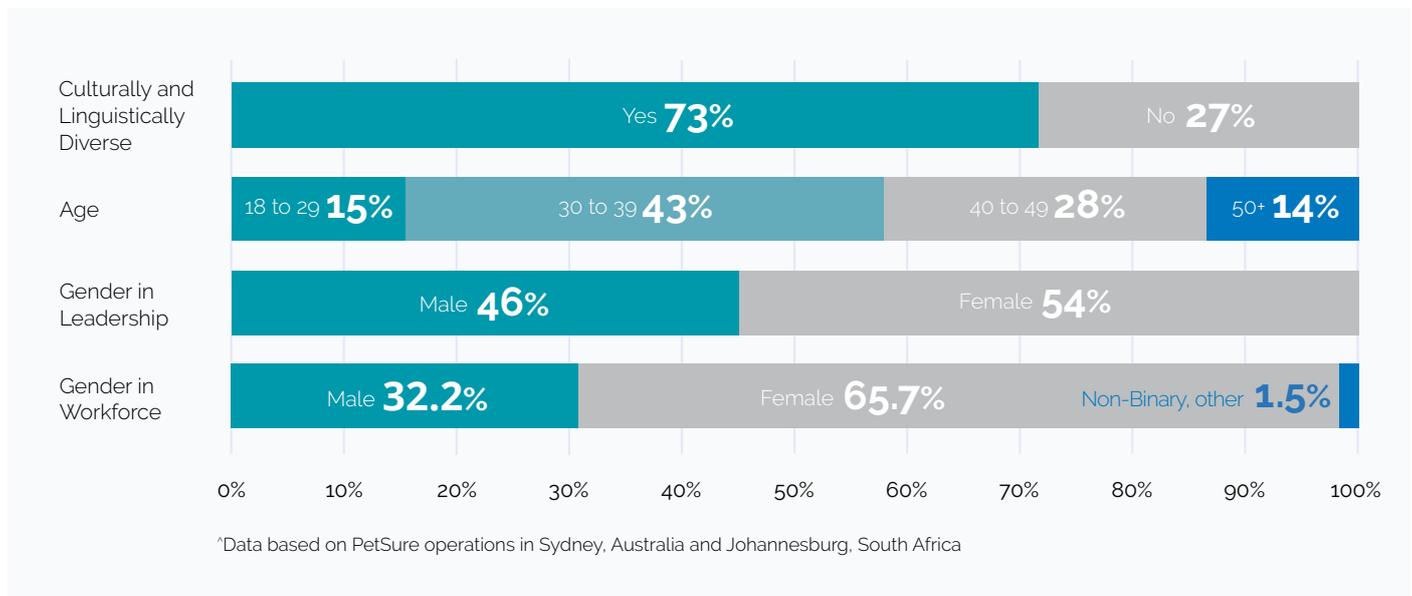


Our Structure, Operations and Supply Chain

Our People

PetSure aims to work in ways that support our diverse workforce while balancing the best interests of PetSure, our team, and each team member. We embrace flexible working through our hybrid work environment, flexible work hours, full-time and part-time roles, and flexible leave options.

PetSure is proud to have a diverse team of professionals, working in equitable and inclusive workplaces, alongside people who represent pet parents in our communities.



Our Governance

PetSure recognises the importance of maintaining a high standard of corporate governance in line with our values and to meet expectations of our people, pet parents, partners, veterinarians, regulators, stakeholders, and the wider communities we serve.

During FY24, the Board People and Culture Committee changed its name to the Board People and Sustainability Committee to formally acknowledge the role and responsibility for environment, social impact and governance, which also includes anti-modern slavery.



Our Structure, Operations and Supply Chain



What we have learned

While our governance structure works well and we have delivered on many of our anti-modern slavery initiatives, the challenge of obtaining real engagement across all levels of the organisation remains. Our anti-modern slavery program, which is currently coordinated by our Chief People and Sustainability Officer and Head of Governance, would benefit from having a dedicated sustainability resource who will drive change across the organisation and ensure our anti-modern slavery initiatives are prioritised and embedded into our broader sustainability strategy.

Supporting our governance framework are constitutions, board and board committee charters, frameworks, policies, processes, procedures and guidelines. Roles and responsibilities have been established for key lines of accountability. Embedding these is a critical component of our governance approach.



Code of Conduct

The values, standards and behaviours expected of our partners, suppliers, directors and employees; designed to enable ethical, fair and compliant business practices.



Whistleblower Policy

Committed to high standards of conduct and ethical behaviour in our business activities, in promoting and supporting a culture of honest and ethical behaviour. We encourage confidential reporting of suspected unethical and illegal activities so anyone can make a report without fear of intimidation, disadvantage or reprisal.



Risk Management Strategy

Focused on financial and non-financial risks to responsibly manage risks across our operations, to manage the expectations of customers, stakeholders and communities, and the impact of risks on strategic objectives.



Outsourcing Policy

Reflects the practices that are in place to manage risks associated with material outsourced activities to ensure risks are properly managed and subjected to appropriate due diligence.



Compliance Framework

Designed to have the necessary systems, resources, processes, and controls in place to manage compliance risk.

Our Operations

Established in 1999, PetSure is Australia's pet insurance market leader. For more than 20 years, we have demonstrated our commitment to working with pet owners, veterinarians, and partners to provide the best possible healthcare outcomes for pets.

We are an insurer and underwriting management agency. At our core, are a team of passionate pet lovers committed to working with veterinary teams to help provide the best possible health outcomes for pets. The underwriting component of our business powers the pet insurance propositions of more than 25 brands.

PetSure is also a leader in pet insurance claims processing, assessing over a million claims from across Australia and New Zealand each year.

Our innovative payment solution GapOnly® is a paperless claims service whereby a customer can obtain claims approval within minutes and simply pay the gap, while still at the vet clinic. GapOnly® is transforming the claims experience with less upfront out of pocket expenses for the pet parent, now available in 1300+ participating vet clinics and specialist hospitals Australia-wide.

And now, PetSure is evolving to become much more than an Australian insurer and underwriter, pet insurer and claims processing enterprise. We are a pet health technology organisation working across a portfolio of aligned businesses, including tele-health, in service of our vision for a better life for pets and their people.

Our Structure, Operations and Supply Chain

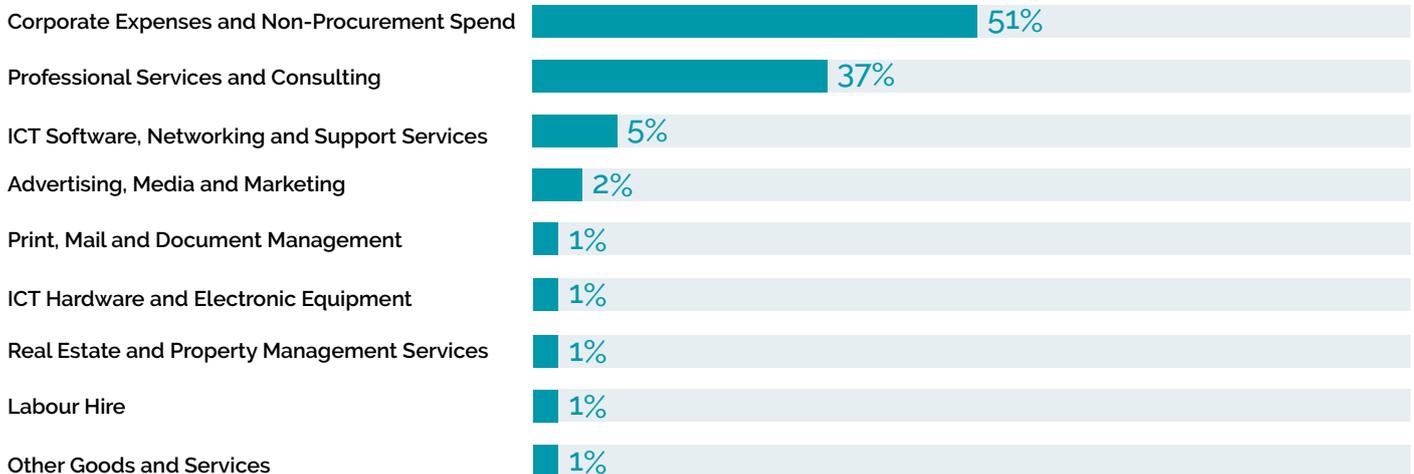
Our Supply Chain

PetSure's total annual procurement spend for the reporting period ending 30 June 2024 was \$110 million with 455 direct (Tier 1) suppliers across 25 goods and services categories. The Australian operations account for seventy-four per cent (74%) of our procurement spend, with South Africa and the Philippines accounting for 24% and 2% of spend, respectively.



Our supply chain consists almost entirely of goods and services that support our core insurance business with office-based operations and support. Over half (51%) of our total spend is on corporate expenses and non-procurement spend.

Key Goods and Services Procured



Our Structure, Operations and Supply Chain



Modern Slavery Country Risk Rating



© SD Strategies Modern Slavery Risk Index

* Top five categories by spend.

Global Supplier Map

In 2024, PetSure sourced goods and services from ten countries with 64% of total procurement spend with 327 suppliers based in Australia or global companies that have a presence here.

Almost all (99%) of spend with international suppliers is with suppliers located in Canada, New Zealand, the Philippines, South Africa, the United States and Singapore. The remaining one percent (1%) of spend is with suppliers located in Great Britain, Ireland and Germany.

For each country, the visual shows the number of suppliers, the percentage of total spend in each country and the main categories of goods and services procured. The map provides an indication of modern slavery risk in each country based on the SD Strategies Modern Slavery Country Risk Rating Index, which assesses country risk against 13 indices.

Australia

327 suppliers
64% of total spend
Corporate expenses/
non-procurement spend
ICT software
Labour hire
Print, mail and document
management
Professional services*

Canada

11 suppliers
<1% of total spend
Corporate expenses/
non-procurement spend
ICT software
Professional services

Philippines

71 suppliers
8% of total spend
Building and construction
Corporate expenses/
non-procurement spend
ICT software
ICT hardware
Real estate/facility
management*

United States

10 suppliers
<1% of total spend
Corporate expenses/
non-procurement spend
ICT software
Professional services

New Zealand

6 suppliers
1% of total spend
Corporate expenses/
non-procurement spend
Professional services

South Africa

15 suppliers
27% of total spend
Advertising, media and
marketing
Corporate expenses/
non-procurement spend
ICT software
ICT hardware
Professional Services*

United Kingdom

5 suppliers
<1% of total spend
ICT software
Professional services

Germany

1 supplier
<1% of total spend
ICT software

Singapore

2 suppliers
<1% of total spend
ICT software

Ireland

1 supplier
<1% of total spend
ICT software

Risks of Modern Slavery

We have assessed our relationship to modern slavery risk using the cause, contribute and directly-linked continuum outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs) and highlighted in the Australian Government's guidance for entities required to report on their modern slavery actions under the Act. This risk relationship also guides the way we respond to modern slavery risks or potential instances of modern slavery.

 <p>Modern Slavery Risk</p>	<p>Cause A business may cause modern slavery or other human rights harm where its actions directly result in modern slavery occurring.</p> <p>Contribute A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.</p> <p>Directly Linked A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chains.</p>
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 <p>How The Risk Could Apply To Us</p>	<p>Cause Our Australian and South African entities are 100% owned and controlled, whereas our operation in the Philippines is a majority owned and controlled joint venture with appropriate but slightly different governance arrangements.</p> <p>Contribute As our company grows in size, management actions including service provider management, are undertaken by a greater number of people. It naturally becomes important to ensure that the whole team is knowledgeable about the potential impact of our actions or omissions and alert to any warning signs of harm we may unintentionally contribute to.</p> <p>Directly Linked While our supplier base poses a relatively low risk of modern slavery practices, we acknowledge there is some risk among our extended supply chain comprising very large companies with global procurement arrangements of which we have low visibility and influence.</p>
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 <p>Our Assessment</p>	<p>Cause In Australia and South Africa, PetSure's human resources and service provider management practices and controls are well understood and reasonably mature and we consider the likelihood of causing modern slavery in those markets to be lower than in the Philippines operations which we acknowledge has a higher inherent risk.</p> <p>Contribute Our service provider management processes, modern slavery risk assessment procedure and associated contractual protections and controls help to mitigate the risk that we might contribute to modern slavery practices. In this regard, we have applied or are in the process of applying our Supplier Due Diligence Program to higher spend and potentially high-risk suppliers. By training our team in the reasons for these changes and sharing learnings in how they are applied, we are reducing the risk that we contribute to harm.</p> <p>Directly Linked We consider our greatest exposure through our extended supply chain and are working with our highest priority direct suppliers to assess and address risks along our supply chain. Our supplier reviews and attestations help understand the risk.</p>
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Risks of Modern Slavery

Operational Risk

Operational Risk refers to the risk of loss due to inadequate or failed internal processes, people, systems, or external factors. PetSure operates the three lines of accountability model to manage its Operational Risk. The Risk Management Strategy (RMS) and relevant governance documents provide detailed roles and responsibilities.

The implementation of the RMS is supported by PetSure's policies and procedures that deal with risk management, clear risk ownership, accountability, and delegated authorities. Management information (including financial, strategic, people and project performance reporting) is used to support effective risk identification, assessment, monitoring, and decision making by Management and the Board. Modern slavery is recognised as a key subset of sustainability risk and considered in relevant operational risks such as service provider management, people, legal and compliance risks.

Building upon the existing obligation and control environment, work is continuing to further embed the management of anti-modern slavery risk in accordance with the RMS and the Board-approved risk appetite statement.

Ongoing assessment of this risk considers controls and mitigants (operating, and future state), which support PetSure's goal to ensure fair treatment and respect of all people involved in our operations while being aligned with our positive risk culture and values.

Supply Chain Risk

In FY24 we updated our supplier risk prioritisation dashboard. To ensure continuity with our previous statements, potential risk for modern slavery was assessed against the following risk indicators:



Industry sector – specific industry sectors deemed as high-risk in international and national guidance documentation such as the use of labour hire workers and outsourcing.



Commodity/product – specific products and commodities or raw materials deemed as high-risk by the US Department of Labor's 2022 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international standards and guidelines.



Geographic location – based on estimated prevalence of modern slavery and the government responses as outlined in the 2022 GSI and using the updated SD Strategies country risk matrix. High-risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State's failure to protect human rights.



Workforce profile – considered the type of labour involved in the production of our goods and services, particularly where base-skill, vulnerable or migrant labour is used as referenced in the Global Slavery Estimates 2022 report in assessing worker vulnerabilities in our supply chain.



Risks of Modern Slavery

Total Spend Analysed

Analysis of \$110 million of spend across our operations identified 9% of spend as potentially high risk for modern slavery, mostly due to corporate expenses and non-procurement in the Philippines. This is a significant reduction in potentially high risk spend reported in our FY23 statement (of 18%) and is largely attributable to an increase in our use of professional services and consulting during the reporting period.

For FY24, 9% of spend is categorised as medium risk and 82% is considered lower risk for modern slavery impacts.

This risk profile would be typical for an office-based insurance provider headquartered in Australia.

Risk by Suppliers

Analysis of 455 suppliers across three operating areas indicates 18% of suppliers are potentially high risk for modern slavery. A further 24% of suppliers are considered medium risk and 58% pose low risk of modern slavery practices. These figures are largely consistent with findings in our FY23 assessment.

Whilst some of our direct suppliers based in Australia represent a lower risk of modern slavery (according to the country risk indices used), we also engage suppliers located in countries and working in industry sectors with a higher risk for modern slavery (for example, ICT hardware and building and construction services).

Risk by Category

Based on the four risk factors (geography, industry sector, commodity and workforce profile), 12 of the 24 categories of goods and services (50%) we procure are potentially high risk for modern slavery. Intra-company service arrangements, such as those with operations in the Philippines and purchases of ICT hardware make up 83% of our potentially high risk spend.

Other lower spend but potentially high-risk categories for modern slavery remain largely unchanged from FY23 and include labour hire, office catering, promotional products, corporate events, travel, sponsorship of community groups and facility management services such as cleaning and security.

Increased levels of modern slavery risk associated with our higher risk and higher spend categories are due to supplier location (primarily the Philippines and South Africa), and the industry sectors involved, including call centres, facility management services, ground transport, travel and catering services.

Risk by Supplier Country

We purchased a wide range of goods and services from 10 countries for the reporting period ending 30 June 2024.

According to the Global Slavery Index 2022 and SD Strategies Country Risk Index 2022, two of our supplier countries pose higher risk for modern slavery: the Philippines and South Africa. We used 71 suppliers located in the Philippines and 15 suppliers in South Africa.

While almost two thirds (64%) of our spend is with suppliers located in Australia (refer to the Global Supplier Map) we recognise that these are Tier 1 (direct) suppliers. We acknowledge that there may be risks associated with their suppliers (i.e. our Tier 2 suppliers) and other suppliers in our extended supply chain. Initial mapping of Tier 2 suppliers to our ICT systems providers suggests that significant levels of risk may exist in their supply chain. Expanding our understanding of Tier 2 supplier risk is a priority action in future reporting years.

Using this analysis as input, and with assistance of our modern slavery risk management advisors, the AMS Working Group reviewed and updated our anti-modern slavery action plan and high-level three-year roadmap used to inform our ongoing risk management approach to modern slavery.



Highlights of 2024

For the reporting period ending 30 June 2024 PetSure focused its efforts across three key areas:

- 🐾 Strengthening governance
- 🐾 Engaging and educating
- 🐾 Continuous improvement

Strengthening Governance

PetSure recognises the importance of maintaining a high standard of corporate governance through its constitution, charters, corporate governance framework, and policies and practices. This enables it to meet the expectations of its customers, stakeholders and the wider community within which it operates. Good governance improves access to information and provides clear and transparent collaboration and communication between stakeholders at all levels of the business.

Governance Documents Reviewed and Updated

All Board and Committee Charters are reviewed on an annual basis as part of our governance program. The Board and the Board People and Sustainability Committee Charters have been strengthened to formally acknowledge the role and responsibility for Sustainability which also includes anti-modern slavery. In addition, reporting on anti-modern slavery is provided to management forums, such as the PetSure Audit Risk and Compliance Committee.

Our Risk Management Framework, Grievance Policy and Cyber Security Framework, all key governance documents, were updated during this reporting period to ensure better alignment with our broader sustainability strategy and anti-modern slavery action plan.

AMS Working Group Meetings

The AMS Working Group continues to meet every two months or more frequently if required. The purpose of the AMS Working Group and these meetings are to champion anti-modern slavery across PetSure, by raising awareness, discussing ongoing challenges, sharing updates, reviewing and monitoring the action plan, and continuing to develop strategies to reduce the risk of modern slavery across our operations and supply chain.

Supplier Due Diligence

Using our modern slavery supplier risk prioritisation process as a basis, potentially high risk and high spend suppliers were identified for FY24. Our supplier due diligence process includes a deep dive assessment of our priority suppliers phased over three years. In FY24 PetSure conducted deep dive assessments of two potentially high-risk ICT suppliers. Gaps and improvement opportunities were identified for both suppliers. We continue to work through the action plans with our suppliers to ensure modern slavery risks are mitigated.

Procurement Risk Assessment Process

During the reporting period ending 30 June 2024 we designed an anti-modern slavery risk assessment framework which will be incorporated into our service provider management processes to ensure that modern slavery risk is more effectively assessed, addressed and mitigated during the different phases of procurement. Using a 'plan, source, manage' framework, we will work with external providers to develop and agree on risk management actions that can be undertaken at each phase of the procurement cycle.

Supplier Expectations Matrix

Building on our Procurement Risk Assessment Process, PetSure developed a Supplier Expectations Matrix which outlines the modern slavery risk management expectations we have of our high, medium and low risk suppliers across five key business areas: commitment to manage risk, policy framework, risk assessment and monitoring, training and awareness and grievance and remedy.



Highlights of 2024



What we have learned

While our AMS Working Group met regularly throughout the reporting year and continues to keep our AMS program on track, more sustainable outcomes would be achieved if working groups members had capacity to drive more initiatives across their respective areas and connect with other teams on a regular basis. Resourcing of our anti-modern slavery program is limited, which presents an ongoing challenge.



Case Study 1: Supplier Expectations Matrix

Developed as part of the Procurement Risk Assessment Process, our Supplier Expectations Matrix outlines minimum modern slavery risk management requirements expected of potentially high, medium and low risk suppliers.

These expectations will be reflected in updated contract clauses, and our supplier relationship managers will have a responsibility to verify and enforce these expectations through regular supplier engagement.

The Supplier Expectations Matrix was established and approved by the AMS Working Group.

The higher the perceived risk, the greater the expectation placed on the supplier to manage the risk and demonstrate practical actions being taken across the five areas listed above.

For example, a high-risk supplier would need to demonstrate that a documented labour rights risk management plan is in place and includes policies, procedures, training and communication programs, grievance mechanisms and effectiveness reviews, that reflects the supplier's commitment to protecting the rights of its workers and the workers in its supply chain.

Comparatively, a lower risk supplier should be able to demonstrate a commitment to protecting the labour rights of its workers and ensure compliance with relevant labour laws.



Case Study 2: Supplier Deep Dive Assessments

In FY24 we conducted deep dive assessments with two potentially high-risk ICT suppliers. Suppliers were required to complete questionnaires and upload documentation and evidence to support their responses. All responses and documents were reviewed by an external advisor with rankings assigned based on the effectiveness of controls in place.

A number of gaps and opportunities for improvement were identified for each supplier across three key areas assessed:

- Operations and workforce
- Governance and due diligence
- Labour hire, grievance and remedy

We will be working with suppliers to implement improvement opportunities to address identified issues such as:

- Labour rights risks are not effectively addressed where recruitment agents and labour hire companies are used.
- Limited operational and supply chain risk assessments have been undertaken and suppliers were unable to substantiate claims of supply chain due diligence or supplier risk assessments.
- While suppliers indicated they delivered modern slavery and human rights training to their employees and contractors, little evidence of training and awareness programs were provided.

Action plans have been issued to both suppliers and we continue to work with suppliers to ensure the action plans are closed out.

Highlights of 2024

Engaging and Educating

Anti-Modern Slavery Awareness Program

PetSure rolled out an anti-modern slavery online training module to all employees across the business based in Australia and South Africa. While it was optional, 60% of employees completed the module, reflecting a strong interest in the issue and a desire to better understand and manage our modern slavery risks. The following key topics were covered in the training:

- 🐾 Definition of modern slavery
- 🐾 Explanation of how slavery occurs in supply chains
- 🐾 Description of some steps PetSure and individuals can take to combat modern slavery
- 🐾 Examples and scenarios of the different types of modern slavery examples

"It was great to learn more about modern slavery in supply chains as well as other services that are typically fulfilled by recent migrants to Australia. It has made me take a more critical view of the world around me and be on the look-out for any warning signs."

"I was very pleasantly surprised to find out PetSure had specific training about Modern Slavery. This is not a topic that is ever discussed or thought about in South Africa, so it makes me really proud to work for a company that takes this issue so seriously."

Board and Committee Engagement

Throughout FY24 the Chief People and Sustainability Officer, in collaboration with the Head of Governance, enhanced Board and Board People and Sustainability Committee engagement and reporting around our anti-modern slavery program. The role of the Board People and Sustainability Committee is to oversee the implementation and effectiveness of the modern slavery risk management program and the development of the Statement which is then ultimately approved by the Board.

AMS Working Group Train-the-Trainer Program

To ensure the effective implementation of our Procurement Risk Assessment Process and Supplier Expectations Matrix, our AMS Working Group participated in a train-the-trainer session delivered by our external modern slavery advisors. The training covered the 'what, why and how' of our new Procurement Risk Process and focused specifically on how to engage priority suppliers in effective modern slavery risk management to ensure our expectations are met and contract clauses complied with. Members of the AMS Working Group will work closely with our supplier relationship managers as the process is rolled out over the coming years.

Supplier Engagement

Effective supplier engagement is an important aspect of our supplier due diligence process. Two of our highest priority suppliers were contacted directly by our supplier relationship managers and advised of our intention to work collaboratively with them to address our collective modern slavery risks.

Working with our external advisors, we established a password protected supplier portal which included awareness raising materials, guidance on answering the self assessment questionnaire (SAQ) and uploading documentation, and links to a secure online survey platform. Suppliers were encouraged to contact us should they encounter any issues. In this way, we were able to build a relationship based on trust and collaboration.



What we have learned

Through ongoing modern slavery awareness training and employee and board engagement, we have observed an increased understanding of and broader commitment to our anti-modern slavery program. Despite ongoing resource constraints, we are making progress in understanding and mitigating our operational and supply chain modern slavery risks.

Highlights of 2024

Continuous Improvement

With the support of our external advisors, we reviewed our FY24 suppliers against key modern slavery risk indicators and updated our modern slavery supplier risk dashboard. While the majority of our high spend suppliers remain low risk, the updated supplier prioritisation process identified 80 potentially high-risk suppliers or 18% (out of a total of 455 suppliers). The results of the FY24 prioritisation will inform our ongoing supplier due diligence program for FY25 and FY26.



Case Study 3: Supplier and Partner Due Diligence Program

In 2024, a total of 455 suppliers, with a collective spend of \$110 million were prioritised against modern slavery risk indicators. The prioritisation identified 13 higher risk procurement categories (based on the key modern slavery risk indicators) and 80 potentially high-risk suppliers. The four highest risk categories included ICT and electronic equipment, labour hire, promotional merchandise and gifts, and higher risk corporate services.

Based on the 2024 supplier prioritisation process, an enhanced modern slavery supplier due diligence program has been developed and will be implemented over three years. The program will focus on suppliers who collectively make up 50% of total spend within the higher risk spend category for the 2024 baseline year. The supplier due diligence program will be modified when new higher risk suppliers are onboarded to ensure these suppliers are effectively assessed for modern slavery risk.

PetSure has also established partnerships with several large companies (many of them reporting entities under the Act). As such, our supplier due diligence program includes collaborating with select business partners to assess, address and mitigate modern slavery risks. A more collaborative approach rather than a risk-based supplier deep dive assessment will be used to ensure effective engagement of, and buy-in from, our business partners.

Contract Clause Review

While our existing anti-modern slavery contract clauses were relatively comprehensive, covering legal, compliance, due diligence, training, reporting and record keeping, the clauses were reviewed in FY24 to better align with our Supplier Expectations Matrix.

The new suite of modern slavery clauses reflect the Supplier Expectations Matrix for high, medium and low risk suppliers and include increased contractual obligations where the risk of modern slavery is deemed to be high. In addition to the issues previously included in our supply/service contracts, our high-risk contracts include clauses on governance frameworks and policies, risk management, and grievance and remedy.

AMS Statement Review

To ensure continuous improvement and good practice reporting, we engaged an external advisor to review our FY23 Statement against the recommendations made in the Australian Council of Superannuation Investors (ACSI) reports: Moving from Paper to Practice (2021) and Compliance without Ambition (2023). The review provided guidance on where to expand our anti-modern slavery reporting particularly for Criteria 3 (describe risks of modern slavery) and 4 (describe actions taken, due diligence and remediation).

Our Future Focus

In the year ahead, PetSure will integrate its anti-modern slavery risk management program, focusing specifically on the ongoing implementation of the supplier due diligence program and Supplier Expectations Matrix (supplier performance standards). Our updated contract clauses, aligned to the Supplier Expectations Matrix will be piloted for new and renewed supplier contracts.

We will undertake deep dive assessments of an additional high risk supplier and work with the suppliers assessed in FY24 to ensure action plans are addressed.

In FY25 we will continue to engage and educate internal and external stakeholders in our anti-modern slavery program. A training needs analysis will ensure that employees, contractors, managers, and directors will have the knowledge and skills necessary to implement, evaluate and refine our approach to modern slavery risk management now and into the future.

Beyond FY25 we will review, evaluate and strengthen our anti-modern slavery program and extend our efforts to managing broader human rights risks.

Through our supplier deep dive assessments, we will gain a better understanding of Tier 2 suppliers to our Australian and overseas operations, focus on lower spend high risk categories, and take steps to identify risks across our extended supply chain.

 <p>Strengthening Governance</p>	<p>Expand Due Diligence FY 2025</p> <ul style="list-style-type: none"> Continue to review and update existing policies and processes Implement the Procurement Risk Assessment Process and supplier due diligence program Work with suppliers to implement actions identified in FY24 supplier assessments Review outcomes and effectiveness of our modern slavery risk management actions and update the anti-modern slavery action plan Refresh Code of Conduct Enhance effectiveness of the AMS Working Group 	<p>Review, Extend, Evaluate and Improve FY2026+</p> <ul style="list-style-type: none"> Align a transparent and accountable anti-modern slavery remediation program with the UNGPs Working with our direct suppliers, assess modern slavery risks posed by Tier 2 suppliers
 <p>Engaging and Educating</p>	<p>Expand Due Diligence FY 2025</p> <ul style="list-style-type: none"> Undertake anti-modern slavery training needs analysis for internal and external stakeholders Continue to roll out employee, board and supplier training and enhance engagement with highest priority suppliers 	<p>Review, Extend, Evaluate and Improve FY2026+</p> <ul style="list-style-type: none"> Identify opportunities to integrate anti-modern slavery messaging into stakeholder communications
 <p>Continuous Improvement</p>	<p>Expand Due Diligence FY 2025</p> <ul style="list-style-type: none"> Review the effectiveness of modern slavery risk management actions in service provider management systems and requirements in supplier contracts Continue to strive for improvements in how we manage and mitigate modern slavery risks Integrate anti-modern slavery actions into supplier and operational systems, processes and monitoring activities 	<p>Review, Extend, Evaluate and Improve FY2026+</p> <ul style="list-style-type: none"> Review and update anti-modern slavery program to reflect new or emerging risks, legislative changes or enhanced stakeholder expectations

Assessing Our Effectiveness

PetSure considers an effective response to modern slavery risk management to include:

- 🐾 Strong modern slavery governance
- 🐾 Effective supplier partnerships
- 🐾 Ongoing training and education

Our FY23 Statement included qualitative and quantitative measures across five key areas including project management/continuous improvement, governance, risk management, procurement, contracts and supplier management, grievance and remedy, and training and communications. These have been consolidated to better reflect our key focus areas for FY24 of governance, supplier partnerships and training and education.

 <p>Governance</p>	<p>Our Approach</p> <ul style="list-style-type: none"> 🐾 Board and ELT support and engagement 🐾 Documented policies and procedures 🐾 Modern slavery integrated into risk management processes 🐾 Reporting channels (whistleblower) reviewed, updated and communicated <p>How We Assess Our Effectiveness</p> <ul style="list-style-type: none"> 🐾 Anti-modern slavery considerations included in relevant company policies and procedures 🐾 AMS Statement approved and submitted on time 🐾 Integration of anti-modern slavery into sustainability risk, as part of our risk appetite statement 🐾 Enhanced internal understanding and discussion of modern slavery risks 🐾 Grievance mechanisms and reporting channels actively communicated to internal and external stakeholders
 <p>Supplier Partnerships</p>	<p>Our Approach</p> <ul style="list-style-type: none"> 🐾 Engagement of high-risk Tier 1 suppliers 🐾 Supplier Due Diligence Process 🐾 Supplier expectations matrix 🐾 Deep dive supplier assessments 🐾 Anti-modern slavery contract clauses incorporated into new supply agreements and contract renewals 🐾 Corrective action planning process that is inclusive and fair <p>How We Assess Our Effectiveness</p> <ul style="list-style-type: none"> 🐾 Ongoing engagement and education of suppliers 🐾 Enhanced due diligence of high-risk suppliers including self-assessment questionnaires 🐾 Issues and opportunities identified in supplier self-assessment questionnaires responses (Tier 1)
 <p>Training and Education</p>	<p>Our Approach</p> <ul style="list-style-type: none"> 🐾 Board, senior leader and employee engagement and training 🐾 Awareness raising and engagement of all stakeholders regarding anti-modern slavery issues and opportunities <p>How We Assess Our Effectiveness</p> <ul style="list-style-type: none"> 🐾 Enhanced organisational awareness and knowledge of modern slavery risks 🐾 Board and senior leader engagement with the anti-modern slavery program 🐾 Engagement of suppliers and other key stakeholders regarding risk management



Consultation and Approval

The development of the Statement was led by our Chief People and Sustainability Officer and Head of Governance, with input from a range of functions across the organisation represented by our Anti-Modern Slavery Working Group, Executive Leadership Team and our teams in South Africa and the Philippines. Input was also sought from an external advisor, who undertook a better practice analysis against broad ACSI recommendations published in 2021 and 2023.

The draft Statement was reviewed by our Risk and Regulatory and Compliance teams, with an external compliance check undertaken by a subject matter expert.

The Statement was reviewed by the Board People and Sustainability Committee and the PetSure Board in December 2024.

This Statement is made in accordance with the requirements of the Act and constitutes PetSure's Anti-Modern Slavery Statement for the year ending 30 June 2024. This Anti-Modern Slavery Statement was approved by the PetSure Board.

Signed for and behalf of the Board.

A handwritten signature in black ink, appearing to read 'A. Kearnan', enclosed in a circular scribble.

Andrew Kearnan
Chair of the PetSure Board
December 2024