

1. 2021 Greencross Joint Modern Slavery Statement

This joint modern slavery statement is made by Vermont Aus HoldCo Pty Limited on behalf of the Greencross Group¹ pursuant to the *Modern Slavery Act 2018* (Cth) for the reporting period of 1 July 2020 to 30 June 2021.

This second joint modern slavery statement reports on the steps taken by the Greencross Group to identify, assess and address potential modern slavery risks in our operations and supply chains during the reporting period.

2. Our structure, operations and supply chains

The Greencross Group is the largest integrated pet care business in Australia and New Zealand. Our purpose is to make our world a happier place through the love of pets.



















We operate 188 general practice clinics and specialist and emergency centres across our veterinary network and also provide pathology and cremation services.

We also operate 261 premises across our retail business that hold a range of products including food in dry, wet, fresh and frozen categories, flea, tick and worm products, pet bedding, pet housing, pet toys, aquarium fish and grooming products as well as provide pet services such as grooming, training and washing services.

We support our veterinary services and retail businesses with our support offices and Australian distribution centres.

The Greencross Group employs approximately 5,400 people in Australia and 850 people in New Zealand across our retail business, veterinary services, support offices and Australian distribution centres.

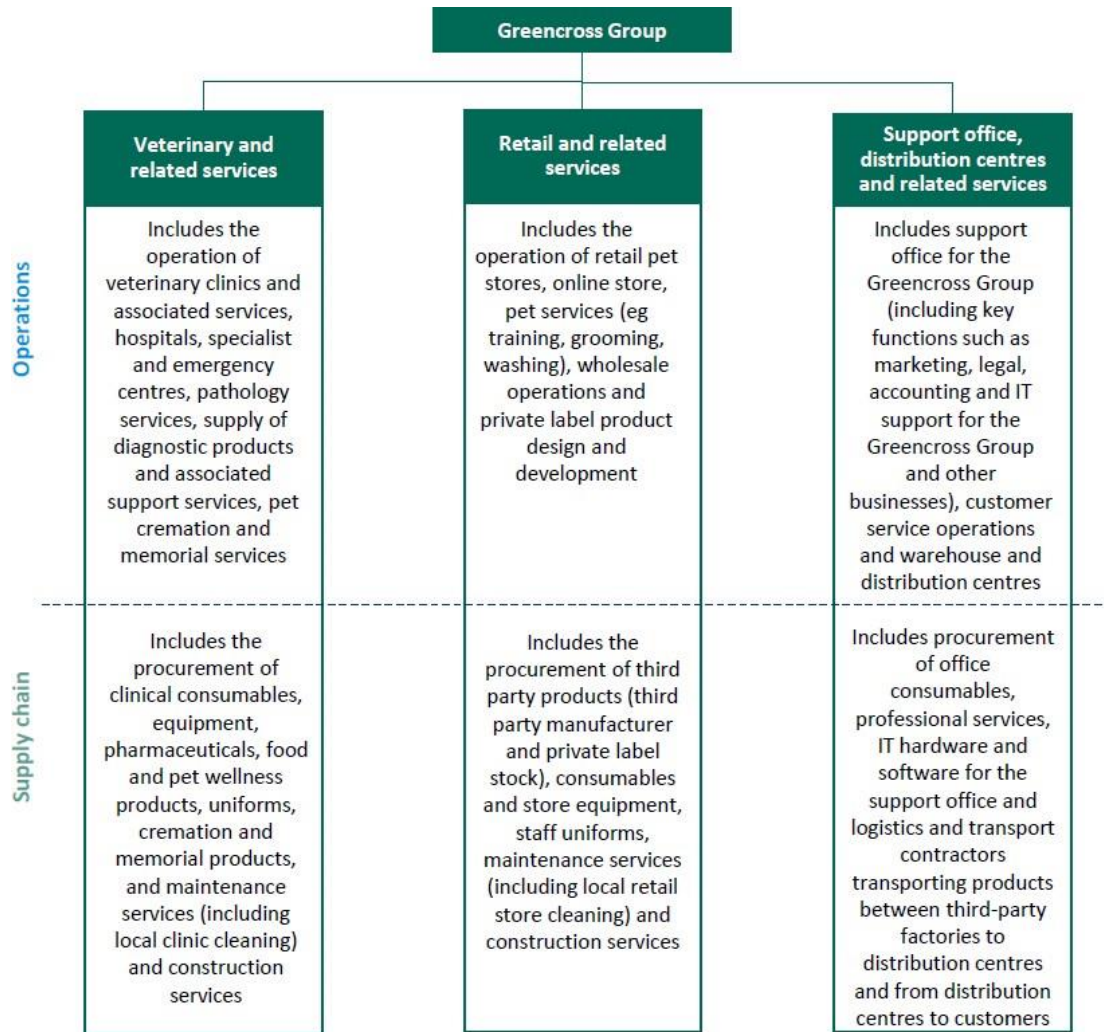
The Greencross Group includes the following brands:

Greencross Pet Wellness Company	
Veterinary and related services	Retail and related services
 Greencross Vets  AEC animal emergency centre  VRH veterinary referral hospital  ARH ANIMAL REFERRAL HOSPITAL	 PETBARN  City Farmers  PetWise ANIMAL & PET SUPPLIES
 vepalabs  PETREST  PETS ETERNAL Pet Memorial Services	 LEAPS & BOUNDS  Barker's Best  PROVIDORE  The Nosh Project  ProBalance  activ BLEND
 ve+care	 ANIMATES

¹ This Joint Modern Slavery Statement is made by each of the entities set out in Appendix 1 (each a **Greencross Reporting Entity** and together the **Greencross Reporting Entities, we, us and our**) and is submitted in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**). Vermont Aus HoldCo Pty Ltd is the ultimate holding company of the Greencross Reporting Entities. In turn, the Greencross Reporting Entities own or "control" (as defined in the Act) a number of other entities. Collectively all of the entities in the Greencross group are referred to as **Greencross** or the **Greencross Group**.

Operations and supply chains

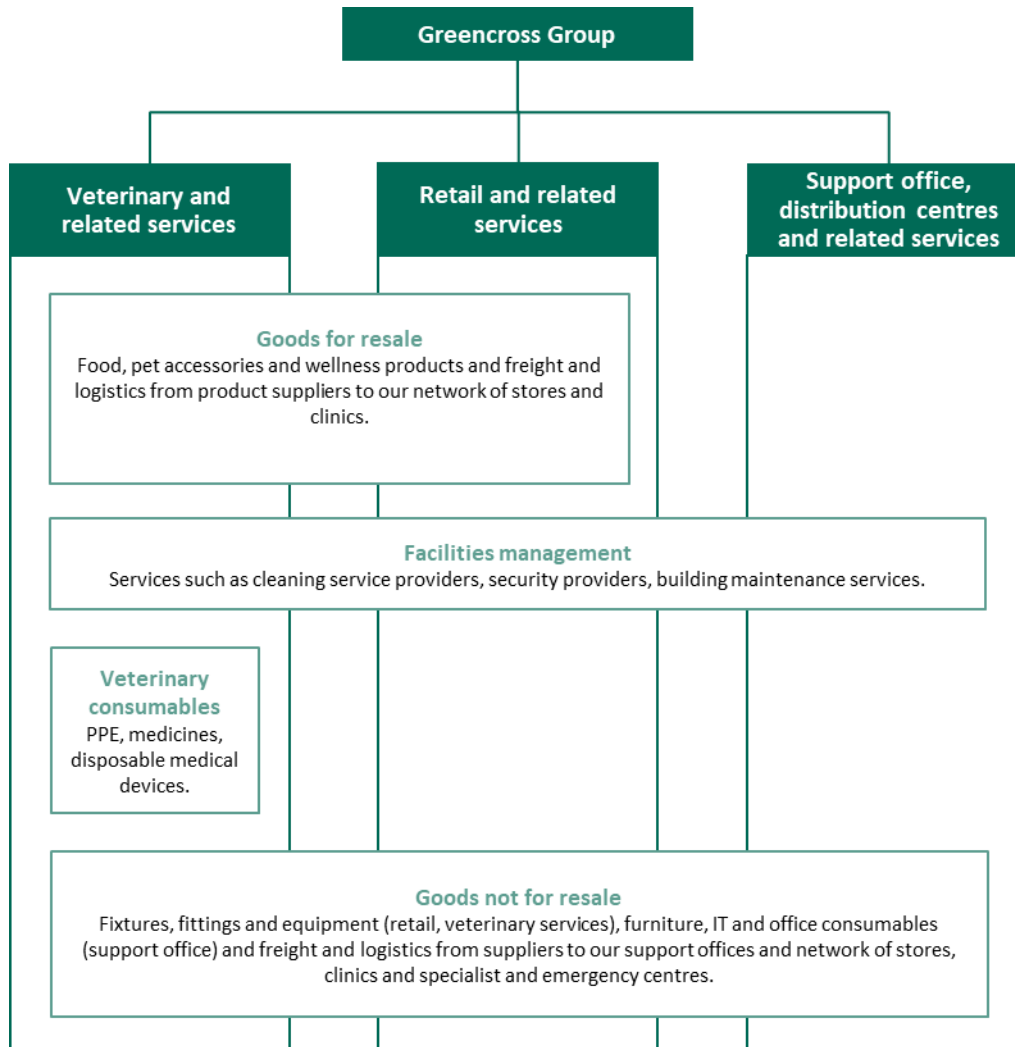
Our operations and supply chains can be categorised as follows:



3. The potential modern slavery risks in our operations and supply chains

Like most entities in the retail and veterinary services sector, our supply chains are both large and complex. We have a significant number of suppliers across our veterinary and retail businesses and brands located in Australia, the Asia-Pacific region, North America and Europe. Consequently, the process of identifying modern slavery risks in our supply chains will be complicated.

During the reporting period, the Greencross Group engaged external modern slavery and human rights experts to consult with management from different business areas in the Greencross Group and the Greencross Group identified the following potential areas of focus from a modern slavery risk perspective in our operations and supply chains:



Each of the potential areas of focus were identified because they were found to likely intersect with one or more modern slavery risk factors related to the following:

 <p>Vulnerable populations</p> <p>Vulnerable populations include people whose personal characteristics or circumstances may lead them to be more susceptible to harm such as migrant workers and base-skill workers.</p>	 <p>High-risk product and service categories</p> <p>Exploitative labour practices are more likely in particular categories of operations and procurement (including specific raw materials, manufacturing, services, goods not for resale and goods for resale).</p>	 <p>High-risk work practices and business models</p> <p>Modern slavery risks are exacerbated in high-risk work practices and business models due to factors such as poor governance structure, a record of treating workers poorly or a track record of human rights violations.</p>	 <p>High-risk geographies</p> <p>High-risk geographies are typically characterised by conditions including demonstrating weak rule of law, high levels of corruption or conflict, internal displacement of people, high cross-border migration and regional or remote areas.</p>
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4. Assessing, addressing and mitigating risks of modern slavery, including due diligence and remediation processes

After identifying potential areas of focus from a modern slavery risk perspective, the Greencross Group assessed existing systems and controls related to addressing modern slavery risks across our large and complex operations and supply chains during the reporting period and implemented the following:

- The Modern Slavery Steering Committee, that was established in FY20, prepared and implemented an anti-modern slavery policy during the reporting period after reviewing the Greencross Group's existing governance policy framework. The Greencross Group's anti-modern slavery policy is available to all team members and explains modern slavery risks, our approach to assessing, addressing and responding to modern slavery and the process for reporting modern slavery concerns.
- We completed a high-level review and mapping exercise of the Greencross Group's operations and supply chains to identify potential areas of modern slavery risks based on the 'Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities' published by the Commonwealth Government with the assistance of external modern slavery and human rights experts.
- The Greencross Group also continued to engage with suppliers, primarily in our retail business as well as suppliers newly engaged by our procurement team, review existing and new supplier arrangements to include modern slavery clauses and update our standard form contracts to include modern slavery clauses.
- Our retail business reviewed their existing grievance and remediation processes in the context of modern slavery risks.

5. Assessing the effectiveness of our actions

During the reporting period, the Greencross Group developed and finalised a modern slavery-related roadmap that will enable the Greencross Group to establish a robust framework to assess and address modern slavery risks and monitor the effectiveness of our actions.

Responsibility for instituting and then overseeing this framework and the modern slavery-related roadmap falls within the mandate of the Modern Slavery Steering Committee whose responsibilities will include monitoring the effectiveness of our actions. The Modern Slavery Steering Committee is drawn from various parts of the Greencross Group, including members of our Executive Leadership Team who have oversight responsibilities that apply across the Greencross Group, and is currently chaired by our Chief Financial Officer.

6. How we consulted

Consultation approach

The Greencross Group's Executive Leadership Team, some of whom are members of the Modern Slavery Steering Committee, have group-wide responsibilities and ultimately have common broad oversight across the Greencross Group. We have continued to use that same structure to ensure that the Greencross Reporting Entities, the entities which the Greencross Reporting Entities own and control and various

businesses and operations within the Greencross Group are consulted and to ensure our approach to modern slavery-related due diligence is consistently applied across the Greencross Group.

In addition, the Modern Slavery Steering Committee held meetings during the reporting period to discuss the modern slavery risks across the Greencross Group's operations and supply chains and the actions required to address and assess those risks as well as develop a modern-slavery related roadmap.

7. Provide any other relevant information

The path forward

The Board of Vermont Aus HoldCo Pty Limited recognises that the Greencross Group can help with addressing the global issue of modern slavery by ensuring that processes exist to raise awareness of the issue within the group and to ensure that modern slavery risks are identified and appropriately addressed. Accordingly, we have endorsed and support the Greencross Group's modern slavery-related program and are pleased to confirm that, during the reporting period, the Greencross Group:

- 1/ finalised a modern slavery-related roadmap outlining key activities related to management systems and controls and grievance and remediation processes for the next three years;
- 2/ implemented a stand-alone anti-modern slavery policy; and
- 3/ provided modern slavery training to our purchasing teams.

Our modern slavery-related roadmap provides a clear framework for the next three years that will guide the Greencross Group's continuing efforts to help address the global issue of modern slavery. It uses a prioritised, risk-based approach appropriate for our large and complex operations and supply chains, where key activities that will refine and strengthen our management systems and controls and grievance remediation processes are progressively undertaken in specific areas of the Greencross Group.

Our modern slavery-related roadmap reflects our continuing commitment to developing and enhancing our capability to systematically identify and respond to modern slavery risks in our operations and supply chains.

This Joint Modern Slavery Statement was approved by the Board of Vermont Aus HoldCo Pty Limited on 24 November 2021. The Board of Vermont Aus HoldCo Pty Limited approved this Joint Modern Slavery Statement on behalf of each Greencross Reporting Entity.



George Wahby
CEO & Managing Director

Appendix 1 – Greencross Reporting Entities

No.	Greencross Reporting Entities	Australian Company Number (ACN)
1.	Vermont Aus Holdco Pty Ltd	ACN 626 842 135
2.	Vermont Aus Midco Pty Ltd	ACN 630 204 572
3.	Vermont Aus Pty Ltd	ACN 626 845 510
4.	Greencross Pty Limited	ACN 119 778 862
5.	Greencross Operations Pty Ltd	ACN 130 686 743
6.	Mammoth Pet Holdings Pty Limited	ACN 146 505 848
7.	Mammoth Pet Pty Limited	ACN 116 248 849
8.	Petbarn Pty Limited	ACN 001 802 759