

## 1. 2020 Greencross Joint Modern Slavery Statement

This joint modern slavery statement is made by Vermont Aus HoldCo Pty Limited on behalf of the Greencross Group<sup>1</sup> pursuant to the *Modern Slavery Act 2018* (Cth) for the reporting period of 1 July 2019 to 30 June 2020. Under the Modern Slavery Act, modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Preparing our first statement under the Modern Slavery Act has been an opportunity for the Greencross Group to understand where we currently stand and start building the foundation for identifying, managing and remediating modern slavery risks in our operations and supply chains.

This 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 that commenced during the reporting period with certain activities planned for the reporting period being completed as at the date of this statement in light of the impacts of COVID-19.

## 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 over 180 general practice clinics and specialist and emergency centres across our veterinary network and also provide pathology and cremation services.

We also operate over 250 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 5,100 people in Australia and 1,000 people in New Zealand across our retail business, veterinary services, support offices and Australian distribution centres.

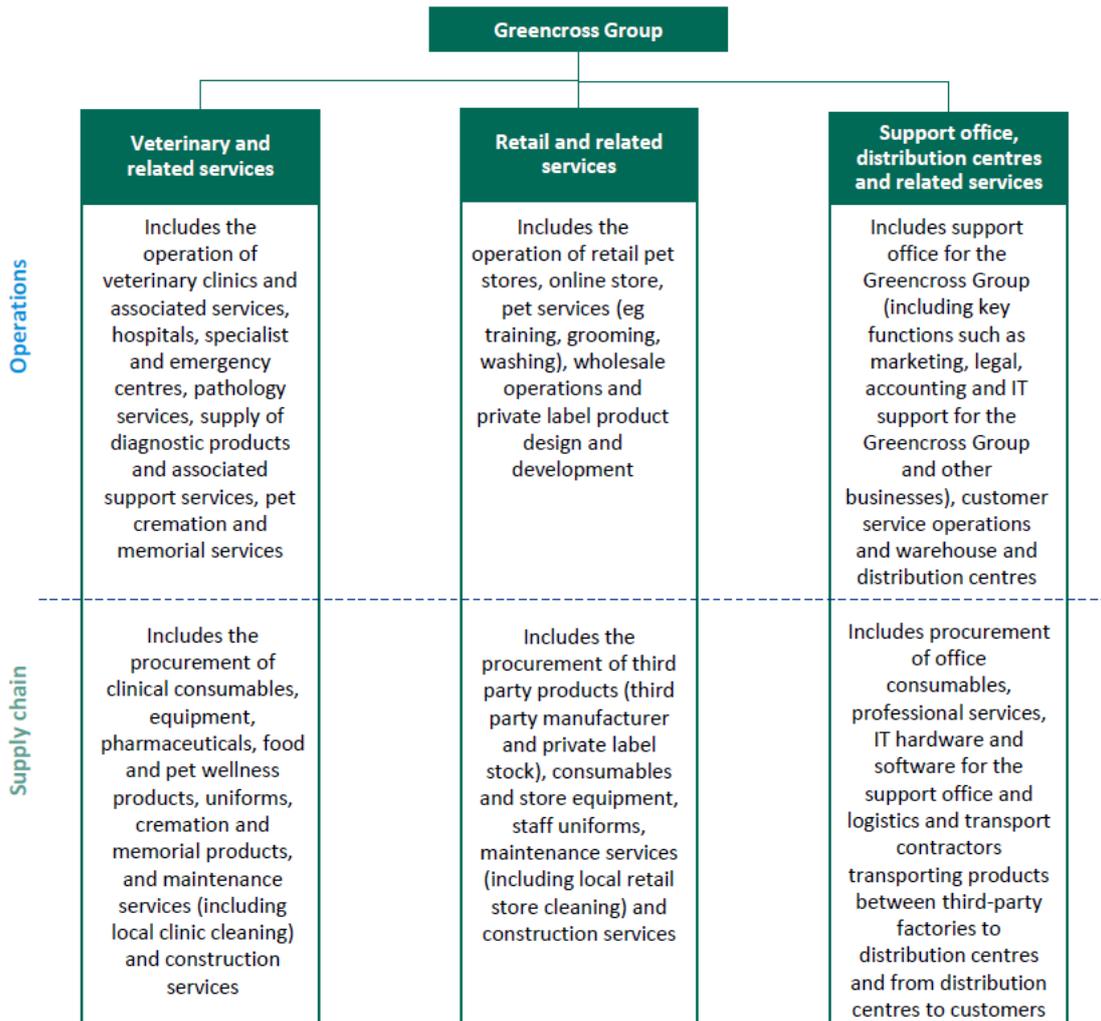
The Greencross Group includes the following brands:

	
Veterinary and related services	Retail and related services
   	  
  	    
	

<sup>1</sup> 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:

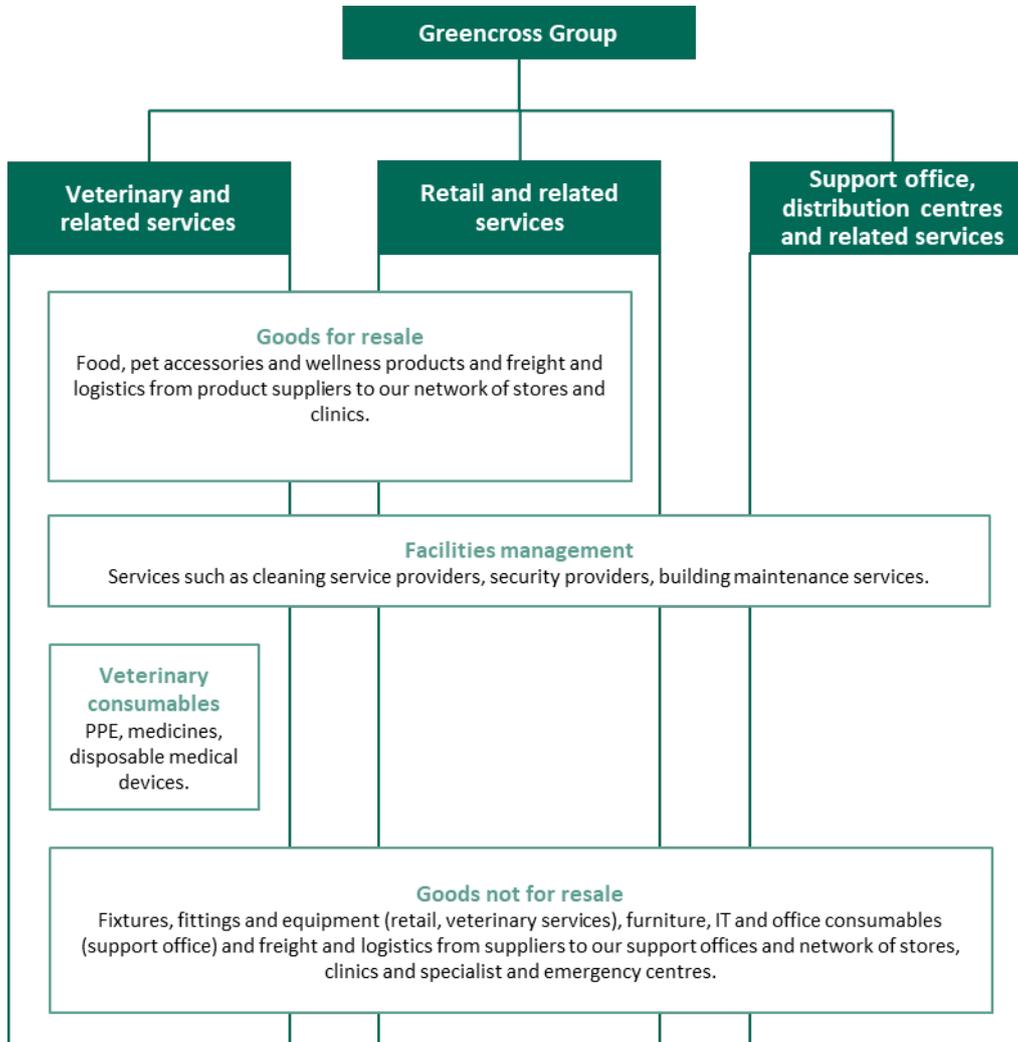


### 3. The potential modern slavery risks in our operations and supply chains

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.

Accordingly, the Greencross Group has initially identified potential areas of focus from a modern slavery risk perspective in our operations and supply chains by consulting with management from different business areas in the Greencross Group as well as by engaging external modern slavery and human rights experts.

We commenced our risk identification during the reporting period and identified as at the date of this statement the potential areas of focus from a modern slavery risk perspective outlined below:



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:

(a) vulnerable populations

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.

(b) high-risk product and service categories

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). Particular sectors are also inherently riskier in terms of the known incidence of modern slavery practices in relation to certain business activities.

(c) high-risk work practices and business models

Risks are exacerbated in high-risk work practices and business models where some suppliers may have particular modern slavery risks due to factors such as poor governance structure, a record of treating workers poorly or a track record of human rights violations.

(d) high-risk geographies

High-risk geographies are typically characterised by conditions including demonstrating weak rule of law, high levels of corruption or conflict, and other factors like internal displacement of people, high cross-border migration and regional or remote areas.

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#### **4. Assessing, addressing and mitigating risks of modern slavery, including due diligence and remediation processes**

In addition to identifying potential areas of focus from a modern slavery risk perspective during the reporting period, the Greencross Group began assessing existing systems and controls related to addressing modern slavery risks across our large and complex operations and supply chains with some activities implemented as at the date of this statement as described below:

##### **(a) Governance and Policies**

The Greencross Group reviewed its existing governance policy framework which includes a Whistleblower Policy that provides a process for reporting and investigating concerns related to illegal or improper practices that could include potential modern slavery risks in our operations and supply chains. We also established the Modern Slavery Steering Committee with members drawn from various parts of the Greencross Group to identify areas of risk and raise awareness of the potential for modern slavery risks in our operations and supply chain.

The Modern Slavery Steering Committee is responsible for ensuring that the Greencross Group addresses modern slavery risks in its operations and supply chains by identifying and implementing the steps required to develop our capability to systematically identify and respond to modern slavery risk across our operations and supply chains.

##### **(b) Due Diligence**

During the reporting period, we commenced the following activities that we completed by the date of this statement with the assistance of external modern slavery and human rights experts:

1. 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; and
2. a mapping exercise of our operations and supply chains against the specific known risk factors relating to geographic locations, sectors and industries, products and services and entities set out in the Commonwealth Guidance and used the Global Slavery Index 2018 published by the Minderoo Foundation to increase our understanding of the potential risk areas in our operations and supply chains.

The Greencross Group also began engaging with suppliers in our retail business during the reporting period and, as at the date of this statement, the retail business has reviewed its supplier arrangements and updated our standard form contracts to include modern slavery clauses. This work builds on existing processes within our retail business that have been used to monitor suppliers for product quality assurance purposes. We note COVID 19-related restrictions on travel nationally and internationally have had a material impact on those activities involving visiting supplier sites.

##### **(c) Grievance and Remediation**

Our retail business reviewed their existing grievance and remediation processes in the context of modern slavery risks and, as at the date of this statement, our retail business has established a ratings system for suppliers to enable our retail business to assess and address modern slavery risks in its supply chains and determine appropriate remediation steps.

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#### **5. Assessing the effectiveness of our actions**

In light of the impacts of COVID-19 and the fact that this is our first statement, our focus has been on identifying our potential areas of focus from a modern slavery risk perspective so we could determine a baseline that will provide a solid foundation to monitor the effectiveness of our actions in both qualitative and quantitative ways with a continuous improvement mindset.

The Greencross Group is in the process of developing a program of work that will enable the organisation 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 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 General Counsel.

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## **6. How we consulted**

### **Consultation approach**

The Greencross Group's Executive Leadership Team have group-wide responsibilities and ultimately have common broad oversight across the Greencross Group. We have used 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.

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## **7. Provide any other relevant information**

### **The way 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 endorse and support the Greencross Group's program including its modern slavery-related program of work and the steps being taken by the Greencross Group to integrate this approach in the way we do business.

We are committed to continuous improvement including in relation to our systems and controls to assess, address and mitigate modern slavery risks. Given our large and complex operations and supply chains which render the identification and assessment of modern slavery-related risks equally complicated, we will develop and enhance our capability to systematically identify and respond to modern slavery risks in our operations and supply chain using a prioritised, risk-based approach.

We will undertake the following in the next reporting period:

- 1/ finalise our modern slavery-related program of work;
- 2/ implement a stand-alone anti-slavery policy; and
- 3/ commence the development and rollout of a modern slavery training program for our purchasing teams.

We are committed to further strengthening our approach to responding to modern slavery risks in the next reporting period and beyond.

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



**Paul Mirabelle**  
**Chairman**  
**Vermont Aus HoldCo Pty Ltd**  
**24 March 2021**

## 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.	Greencross NSW Pty Ltd	ACN 133 433 833
7.	Mammoth Pet Holdings Pty Limited	ACN 146 505 848
8.	Mammoth Pet Pty Limited	ACN 116 248 849
9.	Petbarn Pty Limited	ACN 001 802 759