

1. 2022 Greencross Joint Modern Slavery Statement

This Joint Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) for the reporting period of 1 July 2021 to 30 June 2022 (**FY22**).

Vermont Aus HoldCo Pty Limited is the ultimate holding company for each of the entities set out in Appendix 1 (each a **Greencross Reporting Entity** and together the **Greencross Reporting Entities, we, us, and our**). The Greencross Reporting Entities own or “control” (as defined in the Act) a number of other entities. Collectively, all of these entities are referred to as **Greencross** or the **Greencross Group**.

This Joint Modern Slavery Statement is made by Vermont Aus HoldCo Pty Limited on behalf of the Greencross Group, and it addresses the mandatory criteria as prescribed under the Act. This Joint Modern Slavery Statement demonstrates the Greencross Group’s continued focus on risk mitigation. Modern slavery is a serious violation of an individual’s dignity and human rights. The Greencross Group recognises that addressing modern slavery goes beyond being a compliance issue or a legal requirement, and that it is simply the right thing to do.

2. Our structure, operations, and supply chains

The Greencross Group is the largest integrated pet wellness business in Australia and New Zealand, employing around 7,000 people across retail, veterinary services, support offices and Australian distribution centres. Our purpose is to make our world a happier place through the love of pets.

The Greencross Group operates over 250 retail premises. Goods available for resale to consumers at these premises include pet food, pet bedding, pet housing, pet toys, pet accessories, pet grooming products, and flea, tick and worm products.

Consumers are also able to purchase these goods online at our websites www.petbarn.com.au and www.animimates.co.nz. Some of our retail premises also provide pet services, such as grooming and training. Our wholesale operations sell goods to other businesses, including veterinary clinics.

We operate over 190 general veterinary practice clinics and specialist and emergency veterinary hospitals across our veterinary network. We also provide pathology and cremation services.

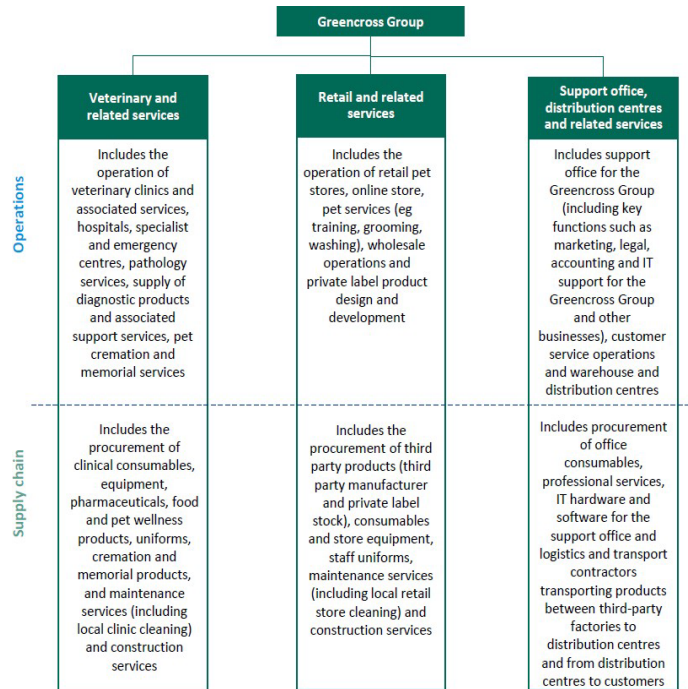
We support our veterinary services and retail businesses with our support offices and Australian distribution centres.

The Greencross Group includes the following brands:

Greencross Pet Wellness Company	
Veterinary and related services	Retail and related services
 Greencross Vets	  
  	   
  	   
 	  
	ANIMATES

Operations and supply chains

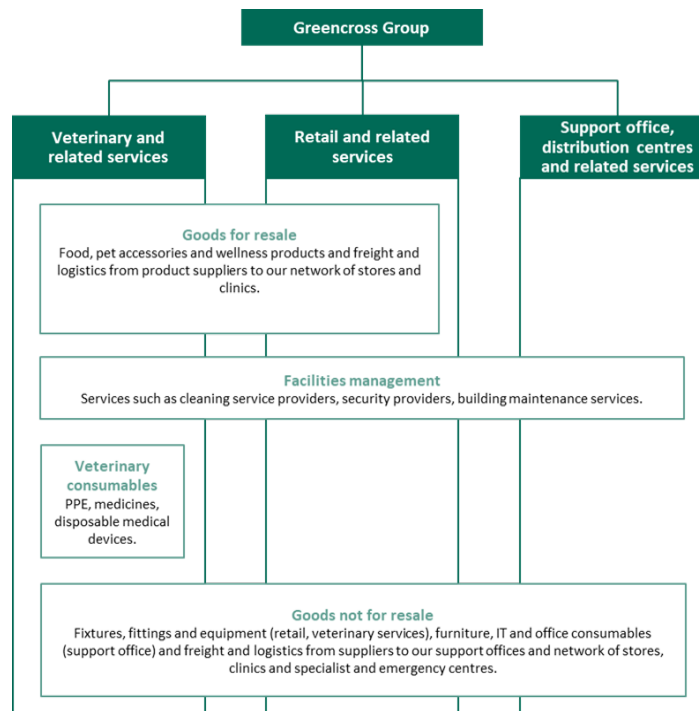
Our operations and supply chains can be grouped as follows:



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

Our operations and supply chains are extensive and complex. Some of our suppliers are based in, and operate out of, Australia, whilst others are based in, and operate out of various regions, including the Pacific, Asia, North America and Europe.

The potential modern slavery risks in our operations and supply chains are outlined below:



The four areas identified above, being Goods for Resale, Facilities Management, Veterinary Consumables and Goods not for Resale, may contain one or more of the generally recognised modern slavery risk factors of:

- ❖ **Vulnerable populations**, such as migrant workers, whose circumstances may make them more susceptible to harm and any form of modern slavery.
- ❖ **High-risk product and service categories**, such as operations and the procurement of specific raw materials and manufacturing of certain goods, are more likely to engage in exploitative labour practices.
- ❖ **High-risk work practices and business models**, such as poor governance and a history of treating workers poorly, which may increase the risk of modern slavery practices.
- ❖ **High-risk geographies**, such as regional and remote areas, and other locations with a weak rule of law, elevated levels of corruption or conflict, or high cross-border migrations, which can serve to exacerbate the risk of modern slavery.

These modern slavery risk factors, which are based on the 'Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities' published by the Commonwealth Government, together with further advice from external consultants, guided our actions in FY22 to assess and address the risks of modern slavery practices in our operations and supply chains.

4. Assessing and addressing the risks of modern slavery practices in our operations and supply chains, including due diligence and remediation processes in FY22

In line with our Modern Slavery Roadmap, our focus remained on assessing and addressing the risks of modern slavery practices in our Retail Goods for Resale suppliers. Reviews and mapping exercises of our Retail Goods for Resale suppliers were conducted throughout FY22 to identify potential areas at risk of modern slavery practices.

We are pleased to confirm that during FY22, we achieved the following:

1. Developed our Supplier Risk Assessment Process, with the addition of, and implementation of, a modern slavery inherent risk assessment tool.
2. Commenced the roll out of our risk assessment tool with our Retail Goods for Resale suppliers.
3. Delivered modern slavery training to our Retail Category and Group Procurement teams and key stakeholders from the Modern Slavery Steering Committee.
4. Dedicated additional resources to addressing any risks of modern slavery practices in our operations and supply chains.
5. Became a member of an established and internationally renowned ethical trade membership-based organisation.
6. Revised and updated our modern slavery-related roadmap in terms of key activities related to assessing and addressing the risks of modern slavery practices in our operations and supply chains.

Supplier Risk Assessment Process

We became a member of a renowned ethical trade organisation to enhance and standardise our assessments and monitoring of potential modern slavery risks across our global supply chains.

Our Retail Goods for Resale supplier risk assessment process was further developed, with the implementation of a modern slavery inherent risk assessment tool. The risk assessment tool included:

- a guide to assist key stakeholders in using and implementing the tool;
- an inherent risk assessment of suppliers, primarily focussed on potential risks associated with vulnerable populations, high-risk geographies, and high-risk products; and
- a supplier questionnaire which covered matters around working conditions, the location of the manufacturing site(s) used by that supplier, outsourcing or contracting arrangements, and input by each supplier around their own policies relating to modern slavery.

Our risk assessment process was applied to new suppliers supplying Retail Goods for Resale and current suppliers undertaking a contract amendment or renewal.

Training

Modern Slavery training was developed and delivered to our Retail Category and Group Procurement teams and key stakeholders from the Modern Slavery Steering Committee.

Training and guidance around our risk assessment process and the use of the risk assessment tool was provided to our Category team in our Retail Goods for Resale supply chain.

Due diligence and remediation processes

Due diligence and remediation processes were addressed through the activities of the Modern Slavery Working Group, under the direction of the Modern Slavery Steering Committee. Members of the Modern Slavery Working Group and the Modern Slavery Steering Committee include Group Procurement, Legal, Retail and Supply Chain, as well as members of our Executive Leadership Team who have responsibilities that apply across the Greencross Group.

The Modern Slavery Steering Committee, continued to meet on a periodic basis throughout FY22 to oversee and guide key decisions and processes around managing the risks of modern slavery practices in our supply chains and operations, as well as other issues raised by the Modern Slavery Working Group. The Modern Slavery Working Group met frequently to monitor and resolve issues identified during the implementation of our processes and tools.

We continued to engage with our suppliers, around our requirements to comply with our modern slavery obligations under the Act and updated our contract terms.

Third-party consultants were appointed to further guide and enhance our processes, and we dedicated additional internal resources to help manage and administer our modern slavery program.

5. Assessing the effectiveness of our actions

Our approach in assessing the effectiveness of our actions to address the risks of modern slavery practices in our operations and supply chains, brought together team members from Group Procurement, Legal, Retail and Supply Chain, on a regular and ongoing basis throughout FY22.

The Modern Slavery Working Group, together with the Modern Slavery Steering Committee, conducted ongoing reviews of our modern slavery processes and tools throughout FY22. Key assessments and improvements from these reviews included:

- ❖ The implementation of the modern slavery risk assessment process and tools in our Retail Goods for Resale supply chain, identified practical issues in effectively and accurately assessing the risks of modern slavery practices. With the approval and guidance of the Modern Slavery Steering Committee, we adapted and enhanced our modern slavery risk assessment processes and tools.
- ❖ Through ongoing assessment and monitoring during our contracting process, we identified improvements to our supply agreements and updated them.
- ❖ The modern slavery training was assessed to determine how it could better meet the needs of our business and was updated.

6. How we consulted

The Greencross Group's Executive Leadership Team, some of whom are members of the Modern Slavery Steering Committee, have group-wide responsibilities across the Greencross Group.

We have continued 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, to guide our approach to modern slavery related due diligence.

The consultation approach adopted also enhances compliance with the Act across the Greencross Group

7. Provide any other relevant information

We have reviewed our Modern Slavery roadmap and envisage that by the end of FY23:

- ❖ We will have assessed the risks of modern slavery practices in our higher risk Retail Goods for Resale suppliers, including formalising action plans across prioritised high risk supplier manufacturing sites.
- ❖ We will have commenced the rollout of our modern slavery supplier risk assessment process with high risk suppliers covering Veterinary Goods for Resale, Veterinary Consumables, Facilities Management and Goods not for Resale.
- ❖ Our modern slavery training sessions will be extended to include more members from our Support Office Operations teams, as well as members from our Veterinary Operations teams.

The Board of Vermont Aus HoldCo Pty Limited acknowledges that modern slavery is an issue that needs to be prioritised by all businesses. The Greencross Group can play a role in helping to address the global issue of modern slavery through:

- ❖ Expanding our assessments of the risks of modern slavery practices across a broader range of our suppliers.
- ❖ Continually assessing our processes and resources to ensure that they are adapted when required.
- ❖ Ensuring that the risks of modern slavery practices in our operations and supply chains are adequately identified and appropriately addressed.

The Board of Vermont Aust HoldCo Pty Limited endorses and supports the Greencross Group’s modern slavery-related program.

This Joint Modern Slavery Statement was approved by the Board of Vermont Aus HoldCo Pty Limited on 29th September, 2022. 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