

Greencross Pet Wellness Company



Our purpose is to make
our world a happier
place through the love
of pets.

**GREENCROSS GROUP
JOINT MODERN SLAVERY STATEMENT
FY23**

4TH REPORTING STATEMENT

'QUARTER ONE' LEVEL 2, 1 EPPING ROAD, NORTH RYDE NSW 2113

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FY23 GREENCROSS GROUP JOINT MODERN SLAVERY STATEMENT

The Greencross Group is pleased to release its fourth joint modern slavery statement. This statement demonstrates our ongoing commitment to assessing and addressing the risks of modern slavery practices across our operations and supply chains, as well as our assessments on the effectiveness of various actions taken by us to address these risks.

This joint modern slavery statement addresses the mandatory reporting criteria prescribed under the *Modern Slavery Act 2018* (Cth) and covers the reporting period of 1 July 2022 to 30 June 2023 (FY23). Our focus in previous financial years has been around assessing and addressing the risks of modern slavery practices across our suppliers of goods for resale. Our focus in FY23 remained on this aspect of our operations and supply chains, however, we also made good progress as we commenced our assessment of modern slavery risk practices across other areas of our business.

The Greencross Group's core values are being passionate, authentic, caring, knowledgeable, as well as working with a sense of togetherness, and these values define how we conduct ourselves, as well as our interactions with others. Our work with our suppliers has been based on these core values. Together, with our suppliers, we are addressing the risks of modern slavery practices across our business.

Section 1: Greencross Reporting Entities

Vermont Aus HoldCo Pty Limited submits this joint modern slavery statement on behalf of itself and each other reporting entity listed in Appendix 1.

Section 2: Our structure, operations and supply chains

Vermont Aus HoldCo Pty Limited is the ultimate holding company for each Greencross Reporting Entity, and collectively they own or control a number of other entities comprising the Greencross Group.

The Greencross Group is the largest integrated pet wellness business in Australia and New Zealand. We employ around 7,000 people across our retail stores, veterinary clinics and hospitals, related veterinary and animal services, our warehousing and distribution centres, and our corporate support office.

The Greencross Group operates over 260 retail stores across Australia and New Zealand. Goods available for resale to consumers at these stores include pet food, pet bedding, pet housing, pet toys, pet accessories, pet grooming products, and flea, tick and worm products. Most of these goods can also be purchased online from our websites www.petbarn.com.au and www.animates.co.nz. In addition to offering third party brands, we also offer a number of our own private label goods for resale to consumers. A number of our retail stores offer pet services such as grooming, puppy school, and pet adoption.

We operate around 165 general veterinary practice clinics across Australia and New Zealand, and around 23 specialist and emergency veterinary hospitals in Australia. Some of our veterinary clinics and hospitals are co-located with, or next to, our retail stores, providing convenience and integrated pet wellness services to our customers and clients. We also offer web based veterinary services.

Our wholesale operations sell goods to other businesses, including veterinary clinics. We also provide veterinary pathology and pet cremation.

Our veterinary and retail businesses are supported by staff from our support office, distribution centres and related services. Together, our purpose is to make our world a happier place through the love of pets.

The Greencross Group conducts business under various brands. The key brands include:



Veterinary and related services



















Retail and related services



















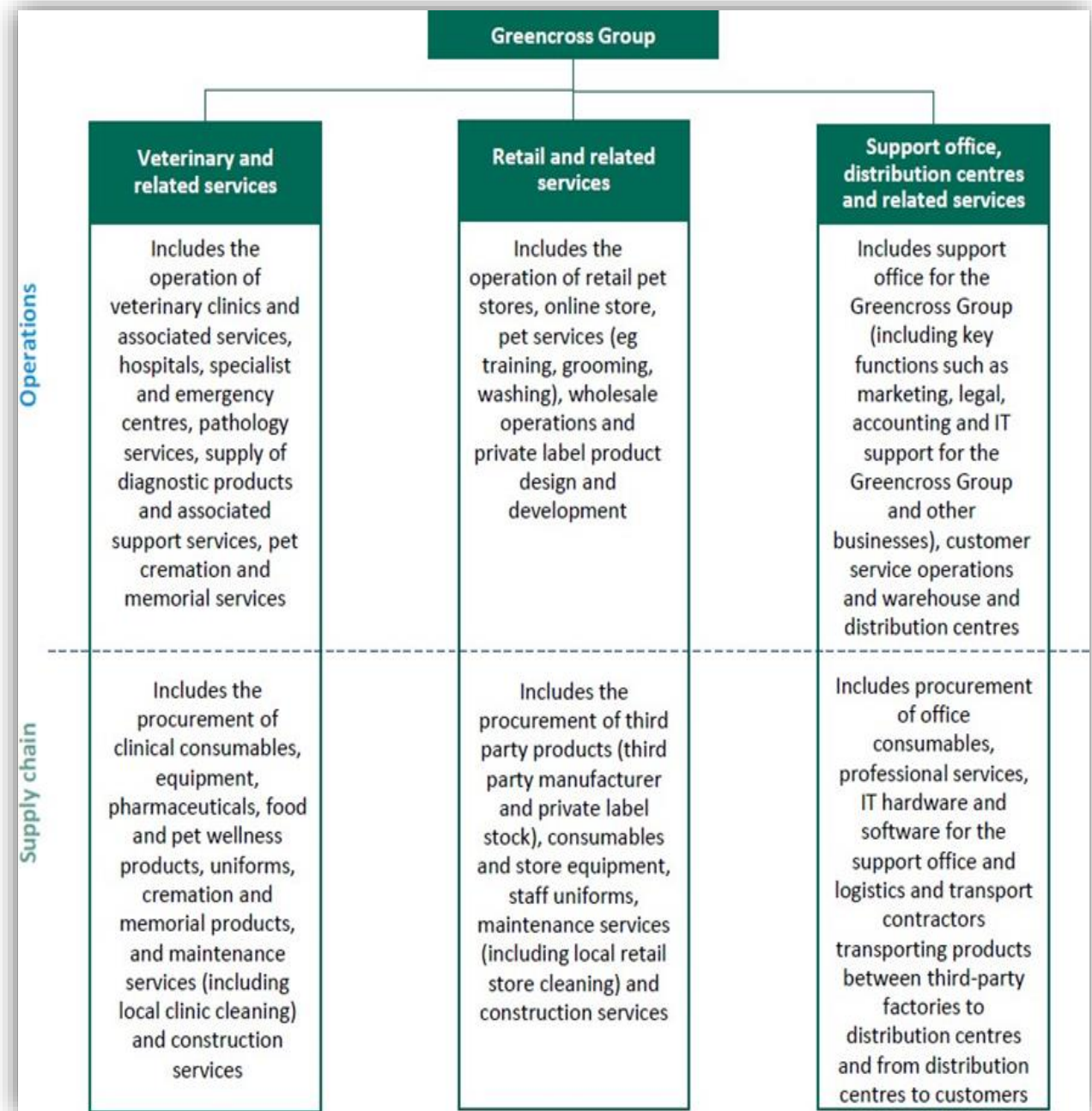






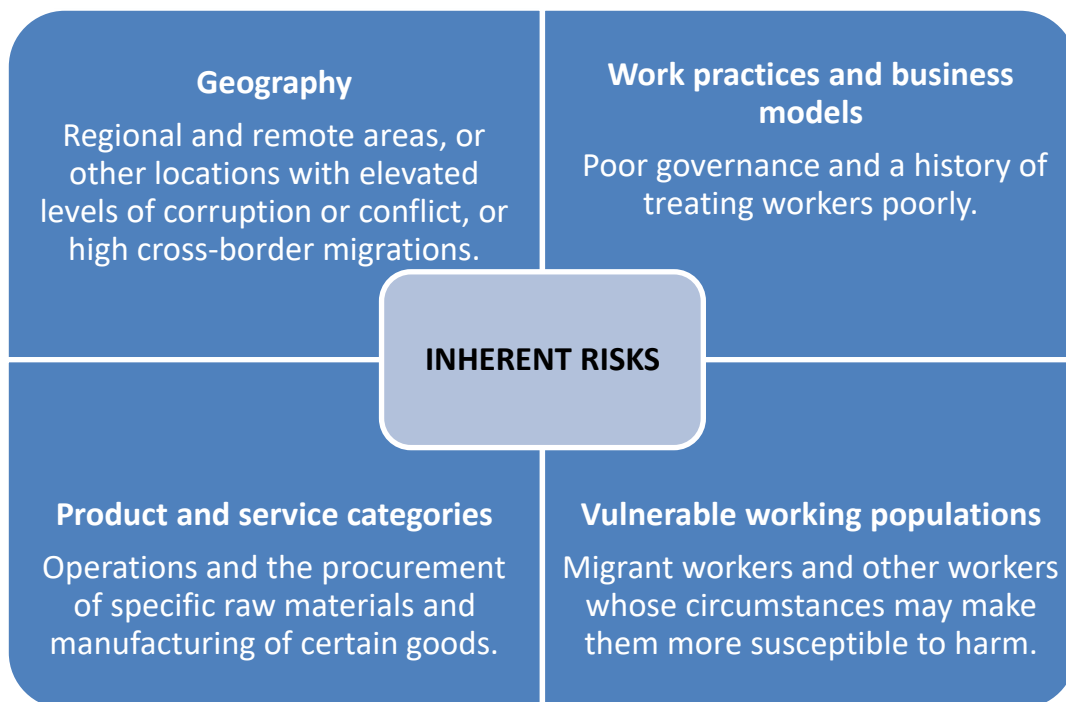


An extensive network of suppliers is required for us to carry out our operations. The overall structure of our operations and supply chains is visually represented in the below diagram.



Section 3: Risks of modern slavery practices in our operations and supply chains

Our operations and supply chains are extensive and complex. We have suppliers based in, and operating out of, Australia, while others are based in, and operate out of various regions, including the Pacific, Asia, North America, South America and Europe. Given the nature of our business, we appreciate the risks of modern slavery practices in our operations and supply chains. Generally recognised inherent modern slavery risk factors include:



The inherent risks of modern slavery practices in our operations and supply chains arise due to the nature of the goods being supplied and/or manufactured for the purpose of resale to consumers, and the geographical location of these supply chains and operations for those goods. We acknowledge that modern slavery practices are by no means restricted to certain industries or geographical locations and can occur in any industry throughout the world, including Australia.

Consistent with previous reporting periods, we were guided by the ‘Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities’ published by the Commonwealth Government, along with advice from external consultants, to assess and address the risks of modern slavery practices in our operations and supply chains in FY23.

Section 4: Assessing and addressing the risks of modern slavery practices in our operations and supply chains, including due diligence and remediation processes in FY23

Our previous statements identified four broad areas across our supply chains and operations as being areas that could include one or more of the generally recognised risk factors of modern slavery practices. These four areas being:

1. goods for resale;
2. facilities management;
3. veterinary consumables; and
4. goods not for resale.

In FY23, our focus remained on assessing and addressing the risks of modern slavery practices in our goods for resale suppliers. For the purposes of this statement, these suppliers are referred to as our suppliers of **Retail Goods for Resale**. Reviews and mapping exercises of our Retail Goods for Resale suppliers continued throughout FY23 to identify potential areas at risk of modern slavery practices. We prioritised assessments of our high inherent risk suppliers, and we further revised and improved our assessment processes.

While our focus remained on our suppliers of Retail Goods for Resale, we commenced our risk assessment across facilities management, veterinary consumables and goods not for resale. For the purposes of this statement, these areas of operations and supply chains, collectively, are referred to as our suppliers of **Services and Goods Not for Resale**.

The achievements outlined below outline our assessment of the risks of modern slavery practices across our operations and supply chains as they relate to our pet wellness business in Australia, and how we addressed these risks.

We are pleased to confirm that during FY23, we achieved the following:

Retail Goods for Resale

1. Finalised, published and distributed our Responsible Sourcing Policy to all of our known suppliers of Retail Goods for Resale.
2. Implemented the process in this Responsible Sourcing Policy to all of our existing suppliers of Retail Goods for Resale.
3. Completed residual risk assessments of all of our existing suppliers of Retail Goods for Resale whose inherent risk assessments indicated they were at high risk of modern slavery practices
4. Developed and implemented our own modern slavery assessment tracker and dashboard for all of our suppliers of Retail Goods for Resale.
5. Enhanced our supplier self-assessment questionnaire and modern slavery inherent risk

assessment tool to standardise measurement and assessment of risk.

6. Delivered two modern slavery training sessions to employees across our Retail Category and Private Label teams, Group Procurement, Supply Chain, Wholesale, and Legal team.
7. Developed and facilitated a webinar for select suppliers of Retail Goods for Resale around our modern slavery assessment processes, including how to complete our supplier self-assessment questionnaire.
8. Onboarded and completed inherent and residual risk assessments of 21 new suppliers of Retail Goods for Resale.

Services and Goods Not for Resale

1. Conducted and completed inherent risk assessments for around 450 suppliers of Services and Goods Not for Resale with an annual spend of more than \$50,000. The findings from these risk assessments served as a foundation to guide our assessment and modern slavery risk review prioritisation of suppliers of Services and Goods Not for Resale.
2. Commenced the residual risk assessment of the priority categories in Services and Goods Not for Resale.
3. Tailored the supplier self-assessment questionnaire developed for suppliers of Retail Goods for Resale to accommodate the broader range of suppliers of Services and Goods Not for Resale.
4. Commenced issuing the tailored supplier self-assessment questionnaire to suppliers of Services and Goods Not for Resale.
5. Designed an interactive online version of the tailored supplier self-assessment questionnaire, with rollout of the online version expected to commence in FY24.

The steps and processes taken to reach these achievements are discussed in further detail below.

Risk assessment process: Retail Goods for Resale

We maintained our membership with a renowned ethical trade organisation to further enhance and standardise our risk assessments and monitoring of potential modern slavery risks across our supply chains.

Our risk assessment process of our suppliers of Retail Goods for Resale was enhanced by the publication and implementation of our Responsible Sourcing Policy in November 2022, and the rollout of our updated modern slavery risk assessment tool.

Our Responsible Sourcing Policy established:

- clear parameters, processes and management guidelines applicable to our suppliers of Retail Goods for Resale; and
- clear parameters and processes around non-compliance with the policy for these suppliers.

Our updated Retail Goods for Resale supplier risk assessment tool in FY23 included:

- a guide to assist key stakeholders in using and implementing the tool;
- a risk assessment of suppliers, primarily focussed on potential risks associated with vulnerable populations, high-risk geographies, and high-risk products, with a more robust and standardised approach to weighting across these inherent risks; and
- a supplier self-assessment questionnaire to assess the working conditions and location of the manufacturing site(s) used by that supplier and their outsourcing or contracting arrangements, as well as input from each supplier around their own processes relating to modern slavery and/or employment generally.

Risk assessment process: Services and Goods Not for Resale

Our assessment of modern slavery risk practices across our suppliers of Services and Goods Not for Resale commenced in FY23.

Inherent risk assessments were completed for around 450 suppliers of Services and Goods Not for Resale, comprising suppliers with an annual spend of more than \$50,000.

These suppliers were prioritised into groups in accordance with their services and supply, and invited to respond to our supplier self-assessment questionnaire.

Training

Our modern slavery training session from FY22 was expanded and delivered to our Retail Category and Private Label teams, Group Procurement, Supply Chain, Wholesale and our Legal team, in February and June 2023.

Training and guidance around our risk assessment process and the use of our improved risk assessment tool was provided to our Retail Category and Private Label teams as required throughout FY23.

Training around our modern slavery risk assessment tools and processes was developed and conducted specifically for our suppliers of Retail Goods for Resale.

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 Working Group scheduled weekly meetings and met throughout FY23 to

monitor and resolve minor issues identified by key stakeholders when implementing any assessment tools or processes. The Modern Slavery Working Group also provided approval or remediation guidelines (as applicable) associated with onboarding new suppliers of Retail Goods for Resale.

The Modern Slavery Steering Committee met on a periodic basis throughout FY23 to assess progress, and direct key decisions and processes around managing the risks of modern slavery practices in our supply chains and operations. Third-party consultants continued to guide our processes throughout FY23, and we dedicated additional internal resources to administer our modern slavery risk management program.

Section 5: Assessing the effectiveness of our actions

Throughout FY23, the Modern Slavery Working Group and Modern Slavery Steering Committee conducted ongoing reviews to assess the effectiveness of any actions taken to address the risks of modern slavery practices across our extensive operations and supply chains as they relate to our pet wellness business in Australia. Key assessments and improvements from these reviews across our supplier base is outlined as follows:

Assessment and Improvements - Retail Goods for Resale

- Implementation of a modern slavery tracker and dashboard facilitated our internal tracking and reporting across our suppliers of Retail Goods for Resale. The system implemented assisted our management of these activities as it:
 - a) provided an overall summary and progress of assessments and remediations (if applicable) undertaken with, or by, said suppliers; and
 - b) allowed key stakeholders to engage with these suppliers to identify meaningful and practical actions which could, and in some cases did, reduce our risk assessment of them as a supplier of Retail Goods for Resale, resulting in a positive outcome for us and these suppliers.
- Developing an enhanced assessment process and measurement tool improved our onboarding and ongoing management process of these suppliers.
- Through monitoring our processes around onboarding or engaging new suppliers, we identified improvements to our assessment of modern slavery risk practices across new smaller suppliers and distributors of Retail Goods for Resale.

Assessment and Improvements - Services and Goods Not for Resale

- Through our engagement with our suppliers of Services and Goods Not for Resale, a tailored supplier self-assessment questionnaire was developed to improve our assessment of the risks of modern slavery practices across our operations and supply chains, and is expected to be rolled-out in FY24.

- We worked with some of these suppliers to guide them to generally available practical modern slavery resource guides and tools which helped further their understanding of the risks of modern slavery.

Section 6: Other relevant information

Due to our ongoing commitment to addressing modern slavery in goods for resale, facilities management, veterinary consumables, and goods not for resale, we expect that by the end of FY24 we will have:

- further assessed the risk of modern slavery practices across our operations and supply chains; and
- continued to improve how we assess and address risks of modern slavery.

Section 7: Our consultation process

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, and the entities which the Greencross Reporting Entities own and control, are consulted and involved in our approach to modern slavery related due diligence.

This joint modern slavery statement was submitted to the Modern Slavery Steering Committee for approval, before it was put to the Board of Vermont Aust HoldCo Pty Limited for review and approval.

This joint modern slavery statement was approved by the Board of Vermont Aus HoldCo Pty Limited on 27 September 2023. 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