

Modern Slavery Statement

FY 2023

1. 2023 Petstock Group Joint Modern Slavery Statement

This joint modern slavery statement is made by Petstock Pty Ltd (ABN 80 098 394 588) on behalf of the Petstock Group (**Petstock Group, we, us, and/or our**)¹.

The Petstock Group has prepared this Modern Slavery statement (Statement) in accordance with the *Modern Slavery Act 2018* (Cth) (the Act). This statement outlines the steps taken by the group to identify, assess and address potential modern slavery risks in our operations and supply chain during the report period ending 30 June 2023 (the **Reporting Period**).

The Petstock Group is made up of Petstock Pty Ltd and all other entities over which Petstock Pty Ltd has control of for accounting purposes, including its controlled entities, businesses, related brands and digital services.

This Statement addresses the mandatory reporting criteria of the *Modern Slavery Act 2018* (Cth) in the following sections:

Modern Slavery Act Requirement	Section Reference in this statement
Identification of the Reporting Entity	1
Description of our structure, operations and supply chains	2
Description of the risks of modern slavery practices in our operations and supply chains and in any entities, we own or control	4
Description of the actions we have taken to assess and address these risks (including due diligence and remediation processes)	5
How we assess the effectiveness of our actions	6
Description of the process of consultations with any entities the reporting entity owns or controls	7
Any other relevant information	

This modern slavery statement was approved by the Board of Petstock Pty Ltd on **20th December 2023**.

¹ This Joint Modern Slavery Statement is made by the Petstock Group on behalf of each of the entities set out in Appendix 1 (each a **Petstock Reporting Entity** and together the **Petstock Group Reporting Entities, we, us and/or our**). PETstock Pty Ltd (ACN 098 394 588) is the ultimate holding company of the Petstock Group Reporting Entities. Collectively, and for the purposes of this Modern Slavery Statement, all of the Petstock Group Reporting Entities are referred to as the **Petstock Group**.



Key highlights for FY23

- Provided Modern Slavery Awareness Training to Petstock Groups Team Members, Executive Team & Board Members.
- Relunched the Whistle Blower Policy.
- Introduced onboarding packs for new suppliers.
- Implemented a Supplier Code of Conduct that includes specific clauses addressing Modern Slavery & Human Rights.
- Held regular meetings with the executive leadership team to efficiently identify and address Modern Slavery Risks.
- Initiated the traceability of our Private Label suppliers.



Key priorities for FY24

- Develop a policy that refers to the UN Guiding Principles on Business & Human Rights (UNGPs).
- Commence a review of existing supplier & business partner contracts across the entire group, with a focus on incorporating Modern Slavery commitments.
- Create & implement a due diligence framework based on risk categorisation, including supplier corrective action plans.
- Provide training for new Petstock Group Team Members to enhance their awareness of Modern Slavery.
- Continue to regularly update the executive leadership team on emerging high risk areas & potential risk mitigation strategies.
- Expand the assessment & categorisation of private label suppliers to better manage associated risks.

About Us

AU & NZ

Operations in Australia and New Zealand

Our Team

4,700+

Number of Team Members June 23

Our Suppliers

2,313

Number of direct and indirect suppliers FY23

Our Operations

270+ Retail stores

55+ Veterinary Clinics

2 Health Centres

180+ Grooming Salons

5 Doggy Day Care

3 Cattery

7 Support Offices

3 NDCs

2. Our Structure, Operations and Supply Chains

About Us

In 2002 we launched our foundational retail brand, Petstock, opening our first store in Ballarat, Victoria in 2002. Since that time, we have expanded and grown in an ever-changing pet industry, today, operating our retail network along with a range of product and service brands across Australia and New Zealand.

Through our business and charity work, Petstock Foundation, we constantly strive to make a positive impact and create a better future. For the communities we serve, the environment we inhabit and in the lives of people and pets we exist for. All of which is encapsulated in the Petstock Group Vision: Together, we make an impact for people, pets and the planet.

Our Operations

Our Petstock Group store footprint spans all Australian states and territories. In 2015, we expanded our network into New Zealand.

We directly employ over 4,700 team members in Australia and New Zealand who work across the Petstock Group in our stores, distribution centres, logistics and support offices. Our team members are governed by contracts that are regulated by Australian and New Zealand employment laws. Our operations also include indirect workers, services contractors and sub-contractors. We also engage with indirect workers who provide support services to meet the needs of our businesses.

All of our operations are supported by team members working in our support offices and distribution centres spanning our network. We embed policies, team member training and provide access to grievance mechanisms to mitigate the risks of modern slavery in our operations.

Our Structure Operations and Supply Chains			
	Structure	Operations	Supply chains
 Retail & Product	Retail Stores <ul style="list-style-type: none"> • Petstock • Petstock Country • Best Friends • My Pet Warehouse • Pet City • Private Label products 	Our retail stores provide pet products including food, healthcare, apparel, accessories, cages, tanks etc. Our Private Label brands provide pet products to our retail stores	Trade Direct suppliers Indirect suppliers Nontrade Direct suppliers Indirect suppliers
 Veterinary Services	Veterinary Clinics (co-located & stand-alone) <ul style="list-style-type: none"> • Aussie Mobile Vets • Vet Hospitals and Clinics • Ourvet • Pet health services 	Petstock Vet & Our Vet operates veterinary facilities within some of our retail stores.	Trade Direct suppliers Indirect suppliers Nontrade Direct suppliers Indirect suppliers
 Pet Services	Grooming salons Diggiddydoggy Day Care Puppy School Cattery	Our pet service range includes grooming, DIY Wash, puppy school, pet adoption, cat boarding, and dog daycare.	Nontrade Direct suppliers Indirect suppliers
 Digital	Petstock.com.au PetPost.com.au Sydhill.com.au Totalanimalsupplies.com.au Petstock.co.nz Pet.co.nz Mypetwarehouse.com.au Bestfriendspets.com.au Caribu.com.au	Petstock Group sells through eCommerce sites in Australia and New Zealand	Trade Direct suppliers Indirect suppliers
 Petstock Foundation	Petstock Foundation	Petstock Foundation is our charity which is committed to making a long-term difference and positive change in the lives of pets and people through education and raising awareness.	
 Warehousing	National Distribution Centre (VIC) Regional Distribution Centre (NSW)	Our distribution centres and warehouses ensure the timely supply of products across our entire eco-system.	Nontrade Direct suppliers Indirect suppliers
 Support Office	Support Offices (VIC, SA, NZ)	Our support offices provide training, human resources, retail management, marketing, IT and administration services to our retail stores, veterinary clinics and services, e-commerce sites and the Petstock Foundation.	Nontrade Direct suppliers Indirect suppliers

Our Supply Chain

As retailers, we procure a diverse array of products and services from 2,300+ suppliers locally and across the world.

The Petstock group relies on third party manufacturers to produce our products for resale, therefore we depend on supplier relationships and due diligence processes to maintain transparency and safeguard the wellbeing of workers in our supply chains.

Across the group, we have numerous direct and indirect multi-tiered suppliers. We are actively driving awareness while establishing systems to support our focus on safety, sustainability, and modern slavery within our supply chain. We continue to collaborate with our suppliers to understand and obtain transparency of our supplier network.

 <p>Trade</p>	 <p>Non-trade</p>
<p>Direct suppliers</p>	
<ul style="list-style-type: none"> • Suppliers who provide us with products or manufacture products or services, purchased within our business. <ul style="list-style-type: none"> ○ Petfood manufacturers ○ Pharmaceutical manufacturers ○ Pet accessories and bulky goods manufacturers ○ Vet healthcare products ○ Livestock (fish, reptiles, small animal etc) 	<ul style="list-style-type: none"> • Suppliers who provide us with goods and services to support our stores, support offices, distribution centre and logistical requirements. <ul style="list-style-type: none"> ○ Cleaning ○ Labour hire ○ Third party logistics ○ Building maintenance ○ Uniforms ○ Signage & Fixtures ○ Solar
<p>In-direct suppliers</p>	
<ul style="list-style-type: none"> • Higher risk products and services, including pet care products, rubber products, pet foods, apparel and textiles, leather products. 	<ul style="list-style-type: none"> • Higher risk services including sub-contractors. • Known materiality risks including polysilicon.

Trade

We collaborate with suppliers who provide us with manufactured products, purchased within our business, this also includes our private label brands. There are also indirect suppliers that contribute to our supply chain through the provision of goods to our direct suppliers.

Our product range includes pet food, pharmaceutical products, vet healthcare, accessories, toys, kennels and fish tanks, live pets such as fish, birds and reptiles and homewares such as pet bowls through to essential hobby farm items such as chicken wire and fencing.

Our Modern Slavery framework governs how we manage human rights risks in our supply chain. In line with our ongoing effort, we are presently working to ensure that our direct suppliers sign our Supplier Code of

Conduct and Terms and Conditions, committing them to take steps to ensure that there is no slavery, prevent harm to the environment and provide a safe and healthy workplace.

Based on previous modern slavery reviews we identified known human rights risks in areas according to geographic risk, product or service risk, sector risk and supply chain risk.

Product Risk

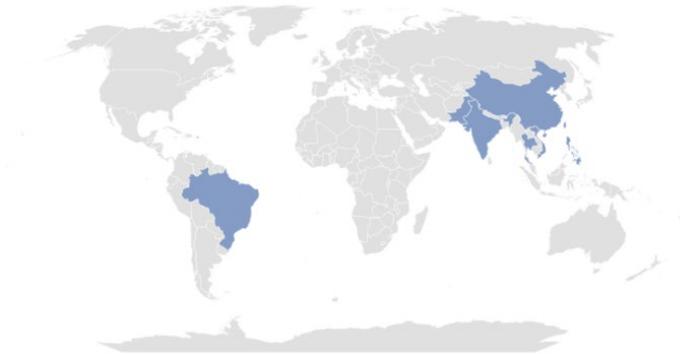
The high-risk product areas include.

- Food:
 - Pet food including meat and seafood fresh, frozen, dried and canned.
- Non-Food:
 - Apparel and textiles such as rugs, bedding, pet apparel.
 - Leather products including collars and saddlery.
 - Rubber products such as buckets.
- Vet healthcare
 - Pet health care products such as pharmaceuticals and supplements.

Geographic Risk:

The following eight countries have been identified as high risk based on risk results:

- Brazil
- China
- India
- Pakistan
- Puerto Rico
- Taiwan
- Thailand
- Vietnam



Sector Risk

The following industry sectors have been identified as high risk based on risk results:

- Food
 - Pet Food industry – livestock, farming, cattle
- Non-Food:
 - Agriculture including rubber farming.
 - Vet health including shampoos.
 - Textile industry
 - Vet healthcare
 - Pharmaceuticals including parasiticides and hoof care.

Private Label Brands

Our product range across our private label brands includes pet food, toys, bedding, bowls, crates, apparel, collars and leads, treats, feeders and drinkers, scratchers and kennels.

Suppliers of these products are required to adhere to our manufacturing agreements which include our standards on modern slavery, health and safety and environmental responsibilities. We are presently focused on revising and enhancing these requirements along with getting the updated agreements signed.

We are proactively collaborating with Australian suppliers to segment ingredient sources including understanding the origin of raw ingredient materials as well as understanding sector specific and supply chain risks. Non-food categories such as apparel, feeders, toys and accessories are mainly sourced from China (94%) and India (1%) and Vietnam (1%).

Non-Trade

To support our operations, we source products and services from non-trade suppliers including products such as uniforms, fixtures, signage and services such as third-party logistics and cleaning. We are aware that our non-trade supply chain is inherently higher risk, therefore we are continuing to prioritise due diligence in known areas of risk such as uniforms and solar.

3. Governance

The Petstock Group acknowledges its responsibility to prevent human rights risks in its supply chain and operations. We have an established governance processes and policies to help us manage modern slavery risks across the Petstock Group.

Our Modern Slavery Framework allows us to focus on the identification, assessment, and mitigation of modern slavery risks. This framework has oversight by the Modern Slavery Steering Committee and consists of key factors including governance, risk assessment, embedding due diligence, training, monitoring and reporting. We use this framework to identify ways in which to improve our approach.

Our Modern Slavery Steering Committee (**Steering Committee**) is made up of members of our executive leadership team and has responsibility for establishing the framework and oversight across the entire Petstock Group (including the Petstock Group Reporting Entities).

The Steering Committee governs the Modern Slavery Working Group (**Working Group**), and together they have consulted relevant management, procurement and buying teams from Petstock Group Reporting Entities to gather information about our supply chains and operations, to assess modern slavery risks and to ensure consistency across the entire Petstock Group.

Our Working Group consultation with **Petstock Team members** including Private Label Brands Team, Merchandising Team, Operations Team on modern slavery risk management.



This Modern Slavery Statement was approved by the Steering Committee prior to being put to the Board of Petstock Pty Ltd for review and approval.

Key Supporting Governance Documents

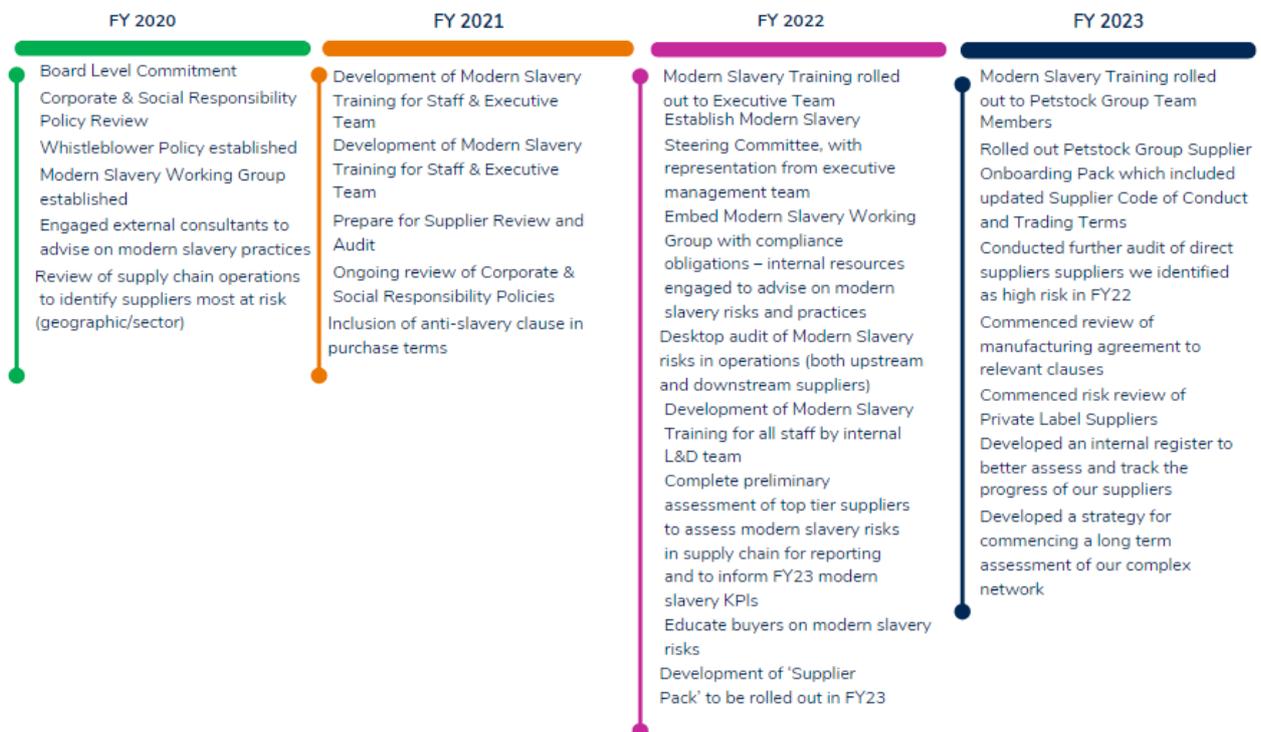
The Petstock Group has several policies and procedures that together, articulate our values and the expectations of our direct and indirect supplier network. The documents listed below relate to modern slavery risk and human rights. Each are subject to approval or oversight from the Modern Slavery Steering Committee.

Policies and procedures include: Modern Slavery Framework, Modern Slavery Awareness Training, Whistle Blower Policy, Supplier Code of Conduct, Supplier Onboarding Packs, Supplier Due Diligence Questionnaire

Whilst we acknowledge that this marks our fourth reporting period, our commitment to continuous improvement drives us to develop and embed processes to reduce the risk of modern slavery in our operations and supply chains. It is our vision to create a better world for People, Pets and the Planet, and we recognise that embedding processes and initiatives to reduce modern slavery in our business has the potential to impact on the prevalence of modern slavery practices in the pet retail, care and services industry.

We are firmly of the view that the establishment of our modern slavery framework, alongside measures taken in previous reporting periods, has enabled us to establish processes for identifying modern slavery risks within our operations and supply chains. This approach for continuous improvement will help us to reduce our exposure to modern slavery risks throughout our network.

Timeline of actions taken to address Modern Slavery



4. Risks of Modern Slavery in our Operations & Supply Chains

We know that our corporate structure and supply chains are extensive and complex, which could lead to **potential exposure to modern slavery risks**. Therefore, taking steps to map and review our supply chain and operations is necessary to help target risk areas to address this matter. We continue to monitor risk through a combination of supplier assessments, team member consultations and regulatory trends.

Our Modern Slavery Steering Committee is committed to working through our framework and put practices in place to address risks.

In FY22 we completed an inhouse assessment of modern slavery risks within our direct product supply chain (Tier 1 Top 100 product suppliers), and our internal operations to consider the risks that could be linked to modern slavery practices. The assessment revealed that certain areas of our supply chains and operations, raised concerns regarding modern slavery risk. For instance, based on risks identified by international human rights group Walk Free, the South American region is largely driven by inequality, political instability and discrimination against migrants and minority groups. Therefore, we identified that food and non-food products manufactured in the region flag potential vulnerability to modern slavery. Consequently, there is considerable likelihood that certain food and non-food products sourced from South America may encounter heightened risks.

We acknowledge that we lack visibility in certain product and service areas of our supply chain and operations and are working to improve transparency with our suppliers to address these issues.

In FY23, we continued to monitor and assess our modern slavery risks through a combination of direct trade and non-trade supplier reviews and team member training.

The following are our known product and service risk priority areas due to the product and/or sector and/or geographic location risks:

Trade

Food:

Seafood and meat products pose modern slavery risk because of the geographic location where these animals are farmed, such as Thailand and Brazil. According to the Global Slavery Index Report, risks of forced labour are evident in Thailand's agriculture and fishing work sectors and exploitation of migrant workers in Thai fisheries has been well documented.

Non-food

Cotton, leather and rubber products pose modern slavery risk because of their geographic, sector and supply chain complexities. For instance, according to Global Slavery Index Reports, cotton farming feeds into the textile manufacturing industry, both areas are linked to forced labour by the Walk Free Foundation.

Vet Care

Pharmaceuticals including parasiticides pose modern slavery risk given the complex nature of the sector, raw material sourcing, manufacturing facilities and lack of transparency in supply chains.

Non-Trade

Products: Recently the solar panel market has triggered human rights risks arising in the production of solar panels from geographic locations such as China. For instance, the rapid growth of an industry or market presents supply chain complexities and lack of supplier transparency from sourcing to manufacturing to packaging and transportation.

Services: Contracting and labour hire suppliers pose modern slavery risk due to the complexities of supply chains and the lack of transparency on third party contractors.

Our Operations

Direct

The majority of our 4500+ team members across our 270+ retail stores, 55+ vet clinics, 5 doggy day care centres,

3 catteries, 3 support office and 3 distribution centres are employed directly. As most of our staff are employed in Australia, the risk of modern slavery in our direct team is low. This is due to the strong Australian regulatory framework which includes the Occupational Health and Safety Act 2004 and the Fair Work Act 2009.

In FY23 we conducted a briefing session with relevant team members including our Merchandise Team on the subject of human rights and modern slavery. We also tabled the results of our desk top direct supplier review - product risk assessment. A new training module on Modern Slavery Awareness was added to our e-learning platform and our Whistle Blower Policy was relaunched.

Indirect

We engage with indirect workers who support our business with services to meet the short-term needs of the business such as Labour Hire workers who support activities in our NDCs, and agency staff who support our vet clinics. Indirect labour carries risk of modern slavery as the workers are engaged through a labour agency.

In FY23 we began conducting reviews of the number of Labour Hire providers we engage for our Australian NDC and Vet services.

Our Supply Chain

Trade

Our product range across our private label brands includes pet food, toys, bedding, bowls, crates, apparel, collars and leads, treats, feeders and drinkers, scratchers and kennels, cat scratchers, kennels and general pet accessories.

In FY22 we identified the following potential modern slavery risk across our food and non-food categories in our product supply chain.



Pet Foods
(fresh, frozen, dried, canned)

Geographic Risk

Brazil, China, Thailand, Vietnam

Product Risk*

Meat: offal, fresh, chilled, canned, dried or frozen beef, poultry, pork
Fish and Seafood: fresh, canned, frozen

Sector Risk

Agriculture, farming, livestock
(Degrading work, repetitive, forced labour, child labour)

Supply Chain Risk

Complex Supply Chains that rely on meat production, fishing industry



Apparel & Textiles

Geographic Risk

High Risk: China, India, Philippines, Pakistan

Medium Risk: Spain, Australia, USA, South Africa

Product Risk

Rugs
Apparel
Bedding

Sector Risk

Textiles industry, cotton production, farming

Supply Chain Risk

Dependance on the cotton production supply chain



Leather Products

Geographic Risk

High Risk Countries: China, India, Taiwan

Medium Risk: Spain, USA, South Africa, UK

Product Risk

Collars
Harnesses
Saddlery

Sector Risk

Farming, Cattle, Livestock

Supply Chain Risk

Dependance on the meat production supply chain

*Labour right violations have been identified as key challenges with the fish and seafood supply chain representing a risk. (Global Slavery Index)

Beef Meat : Cattle and beef from Brazil are reportedly produced with forced labour and/or child labour (Commodities Atlas). Leather is used in a variety of pet accessories.



Pet Care Products

Geographic Risk

High Risk Countries: China, Pakistan, Brazil, Puerto Rico,

Medium Risk: South Africa, France, Ireland, Germany, Canada, Hungary, Lithuania, USA

Product Risk

Pharmaceuticals, Supplements, Pet and Equine Health, Shampoos, Parasiticides, Hoof Care

Sector Risk

Pet Health, Pet Care, Pharmaceuticals

Supply Chain Risk

long and complex supply chains



Rubber Products

Geographic Risk

China

Product Risk

Equine Products

Sector Risk

Rubber Farming

Supply Chain Risk

Dependance on the rubber farming

In FY23, we expanded upon this and conducted a second set of risk assessments that included due diligence checks on the suppliers who had previously identified as high risk in our trade supply chain. The identified suppliers had identified inherent risk by country of product manufacture, product risk e.g., seafood or leather, or supply chain complexities such as pharmaceuticals. Our intent was to establish if our suppliers have processes in place to source responsibly and identify modern slavery and human rights impacts.

We contacted 26 suppliers and invited them to take part in a confidential self-assessment, designed to identify due diligence practices they have in place within their operations and supply chains to see if their risk rating would reduce.

Key questions included:

- Does your company, or any of your direct suppliers, engage in practices that produces substantial negative impacts regarding human rights, labour conditions or local communities?
- Does your company, or any of your direct suppliers, employ workers under the age of 15, engage workers who are currently prisoners, or engage in any other practices that are relevant to the risk of forced labour?
- Please specify what action you would take if you discovered that any of your direct suppliers used forced or compulsory labour and/or human trafficking within its work force (or within its own supply chain)

Of the 26 suppliers invited, 85% successfully completed the assessment, 8% provided satisfactory documentation, while one supplier opted to endorse our Supplier Code of Conduct instead of filling in the self-assessment. This action reflects their acknowledgement of our expected standard of behaviour.

In some cases, the results revealed there is still insufficient compliance measures in place to mitigate human rights in all supply chains and therefore the risk rating of these suppliers could not be lowered.

For example, certain suppliers do not currently perform review or audits on their suppliers' operations. We are taking steps to embed responsible business strategies such as policy, supplier tracking and prioritisation of impacts or risks.

Among these suppliers, only one expressed uncertainty regarding practices within the supply chain that might have produced substantial negative impacts on human rights, labour conditions or local communities, however, it is worth noting that this supplier has a whistleblower service in place that would be activated if any issues were identified. All other suppliers reported that they have sufficient oversight of their supply chains.

Private Label Brands

In FY23, we worked with our Private Label team to better understand our sourcing practices in order to identify potential modern slavery risk areas within this supply chain.

Given that the suppliers within this network supply pet food including seafood and meat, and pet products including textiles and leather products, the results indicated a medium to high risk of modern slavery practices according to the risk indicators used, namely product or service risk, sector risk, geographic risk or supply chain risk.

Based on these known indicators, we conducted a review of the six main suppliers. Out of the six suppliers in review, we conducted site visits at two of the Australia based manufacturing facilities to review their processes and practices. A key objective for FY24 is to review site visit findings and implement regular audits and assessments to ensure compliance, identifying areas for improvement.

All private label food brands are manufactured in Australia. We are currently actively engaging suppliers to help segment ingredients to understand geographical, sector specific and supply chain risks. With non-food categories such as apparel, feeders, toys and accessories are mainly sourced from China (94%) and India (1%) and Vietnam (1%).

Throughout the next reporting period, it is our intention to continue to build on our work to address these issues.

In particular we intend to:

- Adopt a policy to ensure our suppliers are consistent with our commitments.
- Create and implement a due diligence framework based on risk categorisation, including supplier corrective action plans.
- Adopt a strategy for more targeted risk-based reviews and due diligence.

Non-Trade

We acknowledge the potential for modern slavery in our non-trade supply chains. While mapping this supply chain is complex due to the nature of our structure, we are committed to implementing processes to identify and mitigate modern slavery risk.

Our non-trade suppliers provide a range of products including uniforms, fixtures, signage and services such as third-party logistics and cleaners. We are aware that our non-trade supply chain is inherently higher risk, therefore we are continuing to prioritise due diligence in known areas of risk such as uniforms, solar equipment and labour hire.

Solar equipment

We are aware of recent reports linking renewable supply chains to modern slavery and have therefore taken steps to implement strategies to respond to modern slavery risk and due diligence within this supply chain.

In FY23 we undertook a review of the number of solar providers Petstock use to procure solar panel equipment.

We currently engage with two solar suppliers and in the next financial year we will undertake a review of their procedures to understand supply chain information including the geographic location of solar panel manufacture to support our modern slavery controls.

Supplier Documentation Review

We undertook a review of Modern Slavery documents from a select group of current suppliers, specifically those identified as having a higher risk of modern slavery practices. This review was undertaken to ensure that our suppliers were aligning with the National standards required to evaluate and address risk of modern slavery from their own operations and supply chains.

Additionally, this process aimed to affirm our commitment to responsible business practices by fostering transparency and accountability among the suppliers under review.

We reviewed suppliers' modern slavery statements, supplier codes of conduct and related documentation through this process.

In-house Documentation Review

Modern slavery poses a risk within the manufacturing sectors, where complex supply chains can make it challenging to trace labour practices. Therefore, the decision to undertake a review of our manufacturing agreements was made in FY23. Our aim was to ensure relevant clauses are included to help identify and mitigate any modern slavery, safety or environmental risk within our direct supply chain.

This review involved a detailed analysis of clauses within the agreement to ensure they align with modern slavery regulations and responsible sourcing standards.

New Supplier Onboarding

To minimise and mitigate risks associated with new suppliers we implemented a series of new measures to enhance transparency.

We rolled out New Supplier Onboarding practices, which included providing direct trade new suppliers with packs which contain our Supplier Code of Conduct and Terms and Conditions. New suppliers are invited to sign these documents before engaging with the Petstock Group.

By requesting these documents from direct trade new suppliers during the onboarding process ensures that our minimum standards are being communicated to new suppliers from the outset. Our aim for this onboarding process is to establish clear guidelines and make it easier to identify and assess potential risk.

This approach aims to contribute to risk reduction among our suppliers.

5. Actions taken to Address Modern Slavery Risks in our Operations & Supply Chains

To support our day to day operations we have implemented systems and training that requires active participation from Petstock Group team members. Their involvement helps us to recognise, identify and mitigate modern slavery issues.

In FY23, the Petstock Group has undertaken the following actions (KPIs) to address and identify our modern slavery risks. We will continue to review and address the modern slavery risks in our operations and supply chains moving forward.

Board Level and Executive Level Commitment

The Board and Executive team are aware of its social and corporate responsibility to work to identify and address any modern slavery or serious exploitation that may be present in our operations and supply chains. The Petstock Group has established a modern slavery steering committee and modern slavery working group to enforce continuous improvement in this space.

Education and Training

We have continued the phased implementation of our Modern Slavery Awareness training for the Petstock Group to foster responsible and ethical business practices.

Alongside our Executive Training module, a new training module was added to our e-learning platform – Modern Slavery Awareness. The training was designed to equip our team members with the understanding and relevance of modern slavery to our operations and supply chains.

Key components in the training include:

1. Definition of Modern Slavery:
Team members are educated on what modern slavery is and the various forms it encompasses such as forced labour and human trafficking,
2. Business Relevance:
How it relates to our business including high risk areas and sectors where it is most prevalent
3. Reporting Mechanisms:
How team members can report a concern. Team members are informed of the whistle blower procedure we have in place for reporting concerns related to modern slavery.

The module was made available to more than 800 team members including, Store Managers, 2IC, 3IC, Distribution Centre Managers, Team Leaders, and Support Office Staff creating a culture of awareness across every level of the business.

At the end of the year, 91% of the required team members had completed their Modern Slavery Awareness Training. This training serves to help us identify and address modern slavery risks within our operations and supply chains.

Documentation Review and Updates

Modern Slavery Documents

In FY23 we undertook a review of Modern Slavery Documents from a select group of current suppliers who had previously been identified as potentially carrying a higher risk of engaging in modern slavery practices due to complexities within their supply chain.

The identification of these high-risk suppliers was the result of a desk top risk assessment conducted in FY22 considering various factors that could contribute to the prevalence of practices including product risk (food, non-food or Vet healthcare), geographic risk (high risk-based countries as identified by the Global Slavery Index), sector risk and supply chain complexity.

We reviewed suppliers' modern slavery statements, supplier codes of conduct and related documentation to understand the extent to which our suppliers align with and adhere to modern slavery standards. By reviewing these documents, we also sought to identify supplier concerns regarding their own supply chain.

New Supplier Packs

We have rolled out New Supplier Onboarding documents including our supplier code of conduct and terms and conditions to ensure our new suppliers are aware of our standards.

Supplier Code of Conduct

In response to identifying risks in our trade supply chain we have taken steps to roll out our updated Code of Conduct to existing food, non-food and vet healthcare direct suppliers. This decision was made to identify and mitigate any potential risks that may have arisen since the initial engagement.

By communicating our modern slavery, health and safety and environmental standards to our current direct suppliers we aim to ensure that our current suppliers are aware of our expectations and that they are accountable and required to continue to meet these standards.

Manufacturing Agreements

We reviewed our Manufacturing Agreements. This review involved a detailed analysis of the terms and conditions within the agreement to ensure they align with modern slavery regulations and responsible sourcing standards and to ensure sufficient clauses are included to identify and mitigate any modern slavery, safety or environmental risk within our direct supply chain.

Private Label Review

Building upon the results of the departmental desk top review conducted in FY22, prioritising the risks within our internal operations. We worked with our Private Label team to better understand practices to develop an overview of any potential prevalence of modern slavery in this supply chain.

Assessment summary

Given that the suppliers within this network supply pet food including seafood and meat, and pet products including textiles and leather products, the results indicated a medium to high risk of modern slavery practices according to the risk indicators used, namely product or service risk, sector risk, geographic risk or supply chain risk.

Based on these known risk indicators, we conducted a review of the six primary suppliers in our network. Among these, we conducted onsite inspections at two manufacturing facilities located in Australia, where we assessed their processes and practices.

This assessment prompted us to review our manufacturing agreements, ensuring that our supplier expectations are clear, defined and aligned with our standards.

In the next reporting period, it is our intention to improve the transparency of our Private Label food and non-food suppliers by conducting a review to enhance visibility, mitigate risk and strengthen supplier relationships.

6. Assessment of the Effectiveness of our Actions to Address Modern Slavery Risks in our Operations & Supply Chains

We have previously developed a set of Modern Slavery Key Performance Indicators' (KPIs) which allow us to measure and evaluate the effectiveness of our modern slavery risks going forward. The KPIs identified in our FY22 Modern Slavery Statement were as follows:

1. Roll out training for all Petstock Group Team Members on recognising and preventing modern slavery – to coincide with a relaunch of the Petstock Group Whistleblower Policy.

We are determined to continuously improve Modern Slavery awareness across our entire business. In FY23 Modern Slavery Awareness training was rolled out to 800+ Team Members including Store Managers, 2IC, 3IC, Distribution Centre Managers, Team Leaders and Support Office Staff. 91% of the cohort completed the training.

2. Roll out Petstock Group Supplier Pack.

We developed and introduced a New Supplier Onboarding Pack which included our updated Supplier Code of Conduct and Trading Terms that set out the minimum standard of behaviour expected from members of our supply chain. We have now rolled out the supplier code of conduct to 177 trade direct suppliers, of which 41% of these suppliers have signed the code of conduct.

Our Category Managers oversee the effectiveness of the supplier pack by assessing and reviewing the number of returned and signed documents. They also facilitate continuous discussion with our suppliers to enhance transparency and ensure they understand our strategies for addressing Modern Slavery.

3. Conduct an audit of direct suppliers identified in FY22 as exposing us to a higher risk of modern slavery practices in our supply chain in the risk assessments.

After conducting an initial desktop review of our top 100 direct suppliers (Top 100 Tier One Suppliers according to expenditure), twenty-six suppliers were identified as high risk due to factors such as product, geographic risk, or service risk, sector risk and supply chain risk. Subsequently these suppliers were invited to complete further evaluations.

- Twenty-two returned signed and completed questionnaire,
- Two provided satisfactory documentation,

- One opted to endorse our Supplier Code of Conduct,
- The status of one supplier was moved to “on hold” so no further action was taken.

4. Develop a strategy for commencing an assessment of our complex network of direct and indirect suppliers.

During the FY23 review of Modern Slavery documents and processes we noted the lack of a policy document regarding modern slavery and responsible sourcing from within our current framework. A document that confirms our commitment to upholding the human rights of workers in our supply chain and outlines our approach and expectations of our suppliers.

In FY23 we undertook work to begin to adopt these guiding principles, with due diligence and remediation being key focuses as they are key concepts in the United Nations (UN) Guiding Principles. The inclusion of these principles into our framework has helped us deliver a comprehensive approach to addressing modern slavery within our direct and indirect networks.

5. Continue to develop mechanisms to identify breaches of our Supplier Code of Conduct or Terms and Condition and mediate risk through the development of Action Plans, to be rolled out in the next few years. We anticipate to further streamline our processes and action plans as part of our ongoing review of the Petstock Group’s overall Corporate & Social Responsibility obligations.

We are committed to improving breaches of our Supplier Code of Conduct or Terms and Conditions. As we work through updating our framework to include due diligence and remediation which are key concepts in the UN Guiding Principles, we will establish tools and mechanisms to reduce risk.

6. Prepare draft FY23 Modern Slavery Statement for Board approval.

To ensure effectiveness and appropriate governance, our board annually review and sign off on the statement and this was again achieved in FY23.

We believe that the steps we have taken during the FY23 Reporting Period have resulted in a clear understanding of potential gaps and the advancements we need to take to ensure we continue to meet the commitments of our framework and ensure continuous improvement in our supply chains.

7. Our FY24 Plans

The Board of Petstock Pty Ltd (ABN 80 098 394 588) recognises that as a leader in the pet retail, care and services industry, it can impact on the prevalence of modern slavery practices across both the industry and the planet.

Transparency and partnerships are two of the key pillars of our sustainability strategy. We are committed to expanding our expertise through partnerships with key industry leaders within our network who can help guide us on this journey. We believe that this approach will help us to address challenges associated with our operations and supply chains – whilst protecting human rights.

We will continue to prioritise our efforts in key areas where we can have the most impact and influence, and which are most relevant to the Group.

We have previously embedded a set of KPIs for Modern Slavery through the establishment of our Modern Slavery Governance Framework. The progress of this framework has oversight by the Modern Slavery Steering Committee.

During this Reporting Period, the Committee recognised that modern slavery risk in our operations and supply chains cannot be addressed in isolation, as a result, we have identified the need for a more holistic program that supports our overarching governance practices and is adaptable to meet the challenges and changing conditions of a fair and safe workplace, environmental compliance, human rights and modern slavery.

In the next reporting period, we will:

- Develop a more integrated approach that is inclusive of a policy that refers to the UN Guiding Principles on Business and Human Rights (UNGPs).
- Perform an ongoing assessment of current supplier agreements, policies and procedures to incorporate measure addressing modern slavery across the business.
- Design and deliver due diligence responsibilities along with a risk-based approach, including supplier action plans.
- Sustain efforts to increase awareness and to aid in identifying modern slavery risk and high-risk areas by incorporating Modern Slavery education for new Team Members.
- Continue to brief relevant leadership regularly on emerging issues, hotspot risks and risks.
- Conduct a segmentation analysis of private label food and non-food private label suppliers to gain a deeper understanding of raw material sourcing.

We recognise that modern slavery is a growing and complex issue that needs to be addresses collaboratively through responsible sourcing and supply chain transparency. While we have made progress in understanding and addressing our modern slavery risk during this reporting period, we've firmly embedded a culture of continuous improvement. We've established a pathway to collaborate with our team members and key stakeholders, focusing on monitoring and identifying practices related to modern slavery so together we can make a positive impact for people, pets and the planet.



Shane Young
Chief Executive Officer
Date: 20/12/2023



David Young
Managing Director
Date: 20/12/2023

8. Consultation

During FY23 the Modern Slavery Working Group actively engaged and consulted with the Modern Slavery Steering Committee, Executive Leadership Team, Petstock Team members including Private Label Brands Team, Merchandise Team, and Operations Team on our modern slavery framework and modern slavery risk management.

The Modern Slavery Steering Committee convened on four occasions during FY23. These meetings serve as a dedicated forum to address and review the Modern Slavery Act 2018 and report on legislation changes or updates, oversee the implementation of our framework and review and assess the progress of our KPI's.

The Steering Committee also provides a platform for cross functional collaboration with representatives from different departments offering perspectives on the practical implementation of our modern slavery framework.

In preparation of this statement, the Working Group consulted the Steering Committee and Team Members from various departments to ensure that the included information is relevant and accurate. The Executive Leadership Team and the Board of Petstock Pty Ltd has been provided the opportunity for input and feedback prior to final approval of this statement.

Our Modern Slavery Steering Committee (**Steering Committee**) is made up of members of our executive leadership team and has the responsibility for establishing a framework of risk management and oversight across the entire Petstock Group (including the Petstock Group Reporting Entities).

The Steering Committee governs the Modern Slavery Working Group (**Working Group**), and together they have consulted relevant management, procurement and merchandise teams from the Petstock Group Reporting Entities to gather information about our supply chains and operations, to assess modern slavery risks and to ensure improvement and consistency across the entire Petstock Group.

Appendix One – Petstock Group Reporting Entities²

Equine Holdings Pty Ltd ACN 633 418 078	Petstock (Taylors Lakes) Pty Ltd ACN 144 866 768
Genuine Range Pty Ltd ACN 604 821 696	Petstock (Townsville) Pty Ltd ACN 151 976 635
Hart Retail Group Pty Ltd ACN 112 460 401	Petstock (Tuggerah) Pty Ltd ACN 609 948 503
Jahaps Pty Ltd ACN 635 102 126	Petstock (Vermont) Pty Ltd ACN 127 746 490
Pet Market (Australia) Pty Ltd ACN 637 079 595	Petstock (West Gosford) Pty Ltd ACN 604 821 463
Pet Post (Australia) Pty Ltd ACN 633 073 177	Petstock ACT Pty Ltd ACN 131 907 045
Pet Source Pty. Ltd. ACN 120 944 505	Petstock Baldivis Pty Ltd ACN 126 086 708
Petbiz Pty Ltd ACN 127 260 413	Petstock Holdings Pty Ltd ACN 614 533 809
Petstock Group Pty Ltd ACN 147 974 409	Petstock Industries Pty Ltd ACN 613 033 159
Petstock Insurance Pty Ltd ACN 657 486 523	Petstock Inner East Melbourne Pty Ltd ACN 636 839 677
Petstock Pty Ltd ACN 653 273 315	Petstock Investments Pty Ltd ACN 634 401 148
Petstock (Altona North) Pty Ltd ACN 600 092 171	Petstock Joondalup Pty Ltd ACN 130 831 097
Petstock (Ashmore) Pty Ltd ACN 119 636 458	Petstock Mini Pty Ltd ACN 166 638 811
Petstock (Balcatta) Pty Ltd ACN 134 643 137	Petstock NDC Pty Ltd ACN 639 172 991
Petstock (Ballarat) Pty Ltd ACN 051 338 295	Petstock North Qld Pty Ltd ACN 603 250 853
Petstock (Bathurst) Pty Ltd ACN 167 386 469	Petstock North Sydney Pty Ltd ACN 160 875 052
Petstock (Belmont WA) Pty Ltd ACN 613 017 931	Petstock Property Pty Ltd ACN 149 178 094
Petstock (Bendigo) Pty Ltd ACN 128 486 742	Petstock Provincial Pty Ltd ACN 614 040 809
Petstock (Braeside) Pty Ltd ACN 128 414 095	Petstock QLD Pty Ltd ACN 146 411 092
Petstock (Brighton) Pty Ltd ACN 167 386 487	Petstock Retail Pty Ltd ACN 127 690 466
Petstock (Bunbury) Pty Ltd ACN 123 322 805	Petstock Rural Pty Ltd ACN 645 712 223
Petstock (Caboolture) Pty Ltd ACN 610 198 528	Petstock Tasmania Pty Ltd ACN 649 144 589
Petstock (Cannonvale) Pty Ltd ACN 618 353 709	Petstock Toowoomba Pty Ltd ACN 127 794 432
Petstock (Capalaba) Pty Ltd ACN 130 773 232	Petstock Vet (Bennetts Green) Pty Ltd ACN 645 824 184
Petstock (Chelsea) Pty Ltd ACN 111 785 534	Petstock Vet (Bunbury) Pty Ltd ACN 661 279 401
Petstock (Coffs Harbour) Pty Ltd ACN 159 851 064	Petstock Vet (Carrum Downs) Pty Ltd ACN 622 186 618
Petstock (Craigieburn) Pty Ltd ACN 166 638 482	Petstock Vet (Clyde North) Pty Ltd ACN 648 697 536
Petstock (Darwin) Pty Ltd ACN 605 038 293	Petstock Vet (Essendon) Pty Ltd ACN 614 669 135
Petstock (Dural) Pty Ltd ACN 126 160 861	Petstock Vet (Gregory Hills) Pty Ltd ACN 615 558 319

² As at 23 November 2022

Petstock (Erina) Pty Ltd ACN 129 430 208	Petstock Vet (Lilydale) Pty Ltd ACN 620 312 316
Petstock (Essendon) Pty Ltd ACN 167 814 093	Petstock Vet (North Lakes) Pty Ltd ACN 607 523 197
Petstock (Geelong) Pty Ltd ACN 103 220 524	Petstock Vet (Robina) Pty Ltd ACN 621 175 219
Petstock (Hervey Bay) Pty Ltd ACN 159 035 462	Petstock Vet (Rouse Hill) Pty Ltd ACN 603 905 764
Petstock (Hoppers Crossing) Pty Ltd ACN 105 361 868	Petstock Vet (Toowoomba) Pty Ltd ACN 619 337 227
Petstock (Indooroopilly) Pty Ltd ACN 127 745 626	Petstock Vet (Waurn Ponds) Pty Ltd ACN 619 378 237
Petstock (Kawana Waters) Pty Ltd ACN 127 590 318	Petstock Vet Pty Ltd ACN 128 415 734
Petstock (Kilmore) Pty Ltd ACN 630 592 737	Petstock WA (1) Pty Ltd ACN 127 754 205
Petstock (Kingsford) Pty Ltd ACN 165 271 189	Petstock WA CO Pty Ltd ACN 600 108 656
Petstock (Mitcham) Pty Ltd ACN 121 089 521	Petstock Wagga Wagga Pty Ltd ACN 163 732 821
Petstock (Mornington) Pty Ltd ACN 128 338 072	Petvet Altona North Pty Ltd ACN 600 301 139
Petstock (MP) Pty Ltd ACN 124 069 629	Petvet Brighton Pty Ltd ACN 168 114 627
Petstock (Noosa) Pty Ltd ACN 164 948 789	Petvet Craigieburn Pty Ltd ACN 601 406 946
Petstock (Rouse Hill) Pty Ltd ACN 603 905 586	PHIL Ventures Pty Ltd ACN 167 481 192
Petstock (Services) Pty Ltd ACN 106 261 956	PS Centre of Excellence Pty Ltd ACN 639 584 357
Petstock (Shepparton) Pty Ltd ACN 132 045 5563	PS Doggie Daycare Pty Ltd ACN 633 073 300
Petstock (Sunbury) Pty Ltd ACN 603 307 937	PS Equine Pty Ltd ACN 620 228 588
Petstock (Sunshine) Pty Ltd ACN 127 364 087	PS NSW Group Pty Ltd ACN 149 212 322
Petstock (Swan Valley) Pty Ltd ACN 635 557 149	PS Tech Holdings Pty Ltd ACN 660 033 581
Petstock (Tamworth) Pty Ltd ACN 608 715 608	PSD Rural Pty Ltd ACN 648 355 113
St Arnaud Equity Pty Ltd ACN 648 750 707	PSM Retail Group Pty Ltd ACN 658 275 220
Syd Hill & Sons Pty Ltd ACN 627 716 018	Total Animal Supplies Pty Ltd ACN 637 966 691
PS Daycare Ballarat Pty Ltd ACN 655 793 632	Wandoo Great Pty Ltd ACN 149 200 439
New Zealand Subsidiaries:	Best Friends Retail Pty Ltd
(1) Petstock NZ Limited company number 5721473	Best Friends Opco Pty Ltd
(2) Vetland NZ Limited company number 6270296	Our Vet Pty Ltd
(3) Establo Limited company number 7625376	Best Friends Support Services Pty Ltd
(4) Petmarket NZ Limited company number 8308126	Petspiration Group Pty Ltd
(5) Pet.co.nz Limited	

People. Pets. Planet.



Petstock
Group