



# Modern Slavery

**Statement 2021**

For the year ending 31 December 2021



**Acknowledgement of Country**

We acknowledge the Traditional Owners of the land where we operate and work. We recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging.

**Disclosure Note**

The submitting entity is TopCo Investments Australia Pty Ltd ("Real Pet Food, "RPF", "we" or "us") which qualifies as a reporting entity under the Modern Slavery Act 2018 (Cth). TopCo Investments Australia Pty Ltd makes this statement on its own behalf and on behalf of V.I.P Petfoods (Aust.) Pty Ltd and Australian Pet Brands Pty Limited, and all entities owned or controlled by it. RPF is the Australian holding company in the global Real Pet Food group of companies ("Real Pet Food Group" or "RPF Group").

All dollar figures presented in this Statement are in AUD unless otherwise indicated.

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## Statement from our CEO

**We acknowledge our responsibility to managing modern slavery risk in our operations and extended supply chain and commit to complying with the provisions of the Modern Slavery Act 2018.**

**In 2021 we continued to implement our supplier due diligence strategy, building on the solid foundation of the program we started in 2020. We worked closely with our priority suppliers to understand the systems and processes they have in place for managing modern slavery risks.**

**2021 also saw the release of our Supplier Code of Conduct that clearly communicates our broader ESG commitments. The Code reflects the standards and practices we expect from our suppliers, including human rights and labour rights obligations.**

**By continuing to act ethically and responsibly throughout our own operations and our procurement and supply chain processes, we aim to produce Real Food, driven by Real Ethics.**

**This Statement was approved by RPF's Board of Directors in July 2022. The Board will review and update the Statement annually.**



**David Grant**  
Group Chief Executive Officer



Real Pet Food Group  
is a large, global pet  
food company that is  
committed to giving pets  
everything they need  
and nothing they don't.  
We believe in staying  
real and doing right by  
our pets, our fellow pet  
parents, and our planet.

### Our Values and Behaviours

We're driven by our vision to inspire pet parents to choose all that is fresh, natural and real. We're innovators, passionate about pets, and unwavering to our commitment to Be Real. Eat Real. Live Real... but what does that mean?

**Be Real** – At our core, we're a team of people who share a passion for giving our pets our all, knowing that they show up and do the same for us each and every day.

**Eat Real** – Nutrition is crucial to pets' overall health. We're transforming the way we feed our pets, helping furry family members grow stronger and play longer.

**Live Real** – We know what it means to be a pet parent and the joy pet ownership brings to people across all walks of life. We're there through it all, the highs and the lows, and we support our Real Pet family in building meaningful community partnerships that allow us to give back to those who need it most.

### Together for Real

**Be Real. Eat Real. Live Real.**



### OUR BELIEF

Our pets make every day a bit lighter, a bit happier and a bit fresher.

### OUR MANTRA

Happier. Healthier. Better. Fresher.

### OUR MISSION

Create real value in fresh ways for our consumers, our customers, and our company

### OUR VALUES

Work as a Pack  
Make Your Mark  
Lead with Passion  
Change the Game



### Our Purpose

Together we transform every pet's life for the better, with fresher.



### NOURISH THE CORE

### BUILD A BEST IN SHOW EMPLOYEE EXPERIENCE

### LEAD WITH PETFOOD 4.0

### CREATE MORE CONNECTIONS



# 2021 Modern Slavery Risk Management Initiatives

We made significant progress in 2021 to integrate modern slavery risk management initiatives into company policies, codes of conduct, risk assessment frameworks, and supplier risk management processes.

A snapshot of our actions for 2021 is included to the right.

## Governance & Policy

We formalised our modern slavery governance structure and provided monthly updates on modern slavery risks and issues to the ELT and quarterly updates to our Board's Risk & Sustainability Committee.

We reviewed and updated policies, our Supplier Code of Conduct, our Contract Term and Conditions, developed a draft Labour Rights Policy and a draft Responsible Sourcing Strategy.

## Internal Engagement Education & Training

We formalised our Modern Slavery Working Group, engaged and trained our employees and our board of Directors.

## Risk Management

We included modern slavery in our Responsible Sourcing Risk Register and continued to actively manage modern slavery under our broader ESG risk framework.

Our maintenance management software was customised to allow modern slavery to be effectively tracked and reported.

Modern slavery risk management objectives were incorporated into key roles and performance is tracked.

## Grievance Mechanisms

We updated our Whistleblower Policy and implemented an externally managed Speak Up platform to enable anonymous grievances to be raised.

## Supplier Engagement & Risk management

We developed and distributed a modern slavery fact sheet and Supplier Code to all suppliers.

We conducted modern slavery due diligence assessments on our highest risk/highest priority suppliers.

We continue to work closely with suppliers to implement corrective action plans.

More detail on each of these is included under Criteria 4 of this statement.

# Our Plans for 2022

We will continue to build on the initiatives undertaken in 2020 and 2021 to ensure our most salient risks are assessed, addressed, and mitigated.

The following initiatives are planned for 2022:

- Re-do our modern slavery gap analysis and update our modern slavery action plan for 2023 – 2025 considering outcomes of the Commonwealth Modern Slavery Act review process.
- Continue to work with priority suppliers to ensure corrective actions are implemented.
- Conduct due diligence on additional suppliers to capture 100% of high-risk ANZ spend and issue corrective action plans.

- Prepare supplier modern slavery snapshots of three of our highest risk international co-manufacturing partners.
- Undertake to map modern slavery risks and vulnerabilities along the extended supply chain focusing on our highest risk/highest priority commodities initially.
- Develop and implement a remedy pathway that complements our Whistleblower Policy and Speak Up process, and that prioritises the rights and protection of victims.
- Review worker voice data collection opportunities for at-risk workers in our supply chain and identify potential project partners.

## Our Plans for 2023

- **Undertake due diligence assessments of highest priority Tier 2 suppliers (provider of services or goods to our suppliers) identified by our direct suppliers.**
- **Implement priority actions identified in our 2023–2025 modern slavery action plan.**



## Our Organisational Structure

RPF Group is a large, global pet food company with close to 800 employees in Australia and a small number of staff based overseas. RPF Group is a privately-owned business, with its ultimate holding entity, TopCo Investments Pte. Ltd., incorporated in Singapore. RPF Group has operations in Australia, New Zealand, China, UK and Singapore. RPF's operations include owning and operating pet food manufacturing facilities, including managing and overseeing the working conditions of our employees. Our operations also include the sale, marketing and distribution of our pet food and related products.

RPF Group entities covered by this statement are listed in Annexure A.

## Our Governance Framework

Our Modern Slavery Compliance Officer coordinates our modern slavery risk management response and heads up our Modern Slavery Working Group. All issues related to modern slavery risk and compliance within our operations and our extended supply chain are directed to the Modern Slavery Compliance Officer who undertakes relevant action, in conjunction with RPF's broader Modern Slavery Working Group. As a member of our Senior Leadership team (SLT), the Modern Slavery Compliance Officer reports quarterly to RPF's Risk and Sustainability Committee on progress, issues, and opportunities relevant to our modern slavery risk management program.

**"It's not difficult being passionate about respecting the rights of the people working at RPF or through our global supply chain."**

**Sean Joyce**  
Modern Slavery Compliance Officer



# Our Policies

We have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers, that are reviewed regularly. This policy framework ensures that our team members and suppliers clearly understand our expectations, can recognise when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint. The policies to the right are those that are most relevant to preventing and addressing modern slavery among our team members and workers in our supply chains.

## 'Speak Up' Whistleblowing Program

We encourage all our staff, customers and business partners (including suppliers and those working in our supply chain) to report any concerns related to the direct activities, or the supply chains of the Company. Recognising the importance of providing a widely accessible, timely and confidential grievance mechanism, we implemented a 'Speak Up' process in 2021. The platform, which is managed externally by Whispli, enables all stakeholders (including workers in our supply chain) to raise concerns easily and confidentially.

## Employee Code of Conduct

Our Code makes clear to our employees the actions and behaviours expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour.

## Supplier Code of Conduct

Our Supplier Code of Conduct reflects the standards and practices we expect from all our Suppliers. Broadly this includes an expectation to adhere to a range of social, environmental and safety related requirements, including modern slavery and labour rights requirements.

## Recruitment Policy

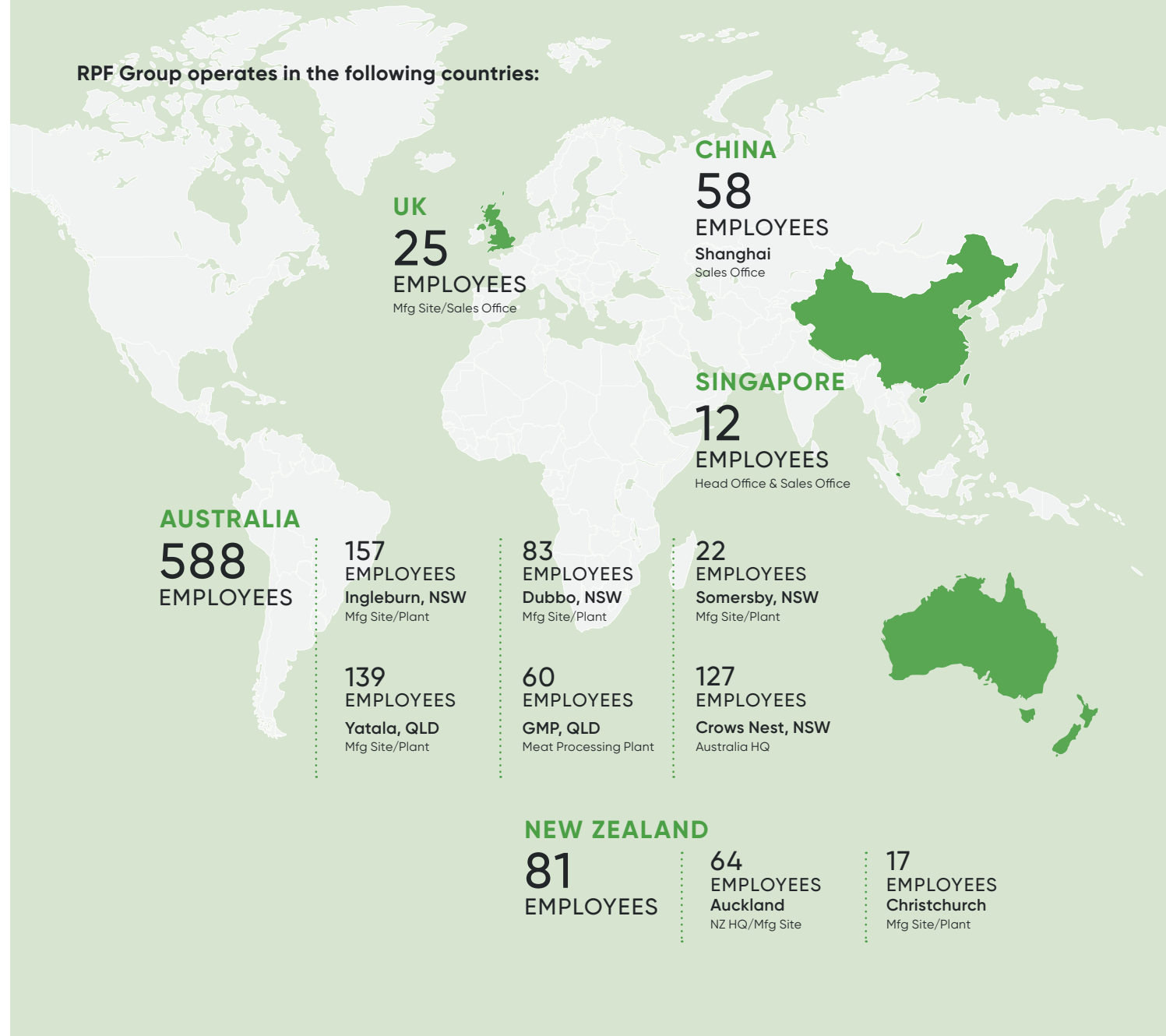
We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

# Our Operations

The RPF Group is involved in manufacture & distribution of dry, wet, fresh, chilled and treats pet foods (for cats and dogs) in Australia, China, NZ, UK, and Asia. We have over 600 employees across our Australian operations and 81 employees in New Zealand. We also have a small number of employees in our head office and sales office in Singapore (12), in our manufacturing site and sales office in the UK (25) and in our sales office in Shanghai China (58).

In Australia, we have manufacturing facilities in Yatala and Wulkuraka in Queensland, and in Ingleburn, Dubbo and Somersby in NSW. More information on our Australian manufacturing operations is included to the right or can be found on the company website.

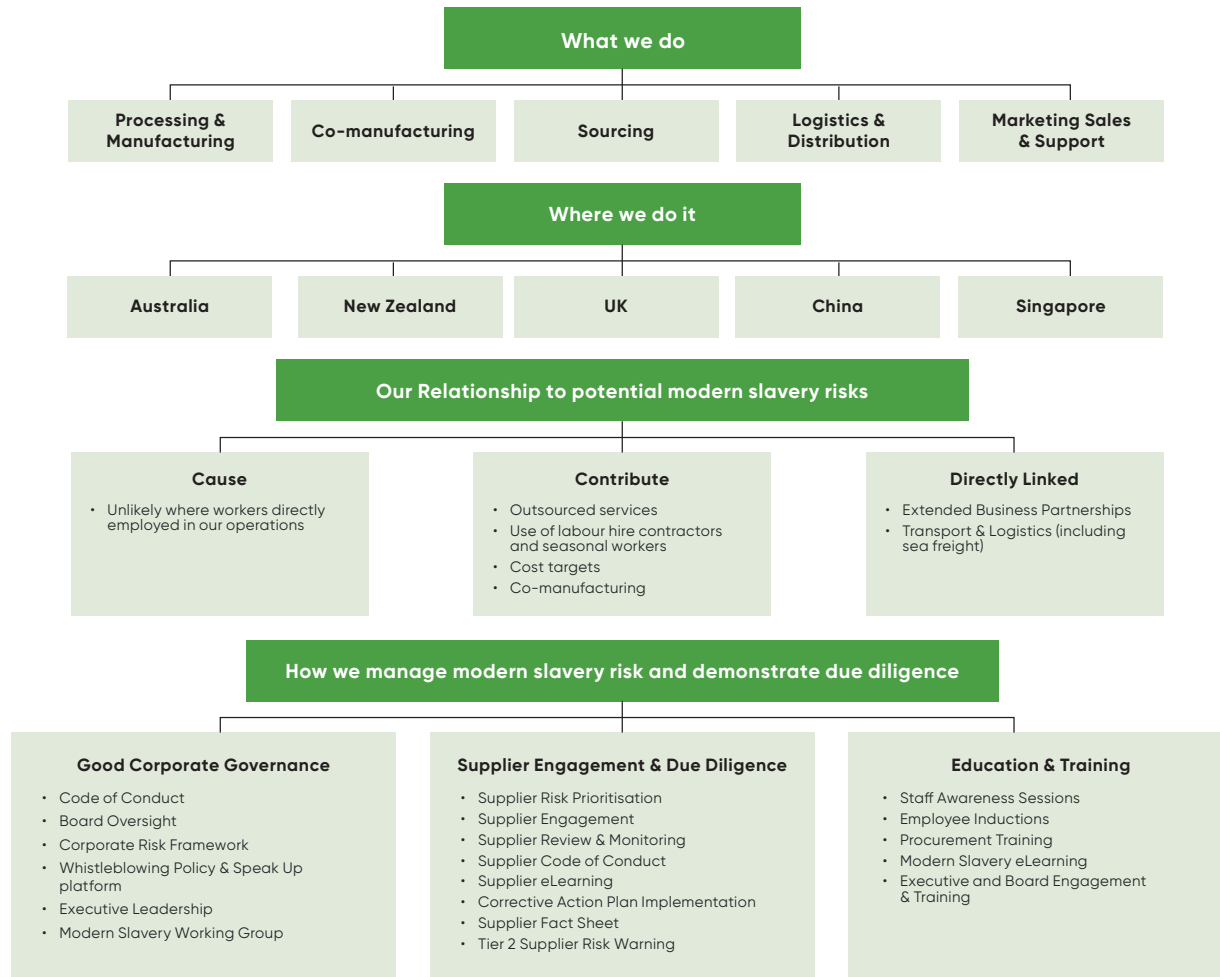
RPF Group operates in the following countries:



# RPF's Operating Model and Relationship to Potential Modern Slavery Risk

The Modern Slavery Act 2018 defines modern slavery as including forced labour, debt bondage, deceptive recruiting for labour or services, trafficking in persons, slavery, the worst forms of child labour, servitude and forced marriage.

In assessing our relationship to modern slavery risks, we followed the UN Guiding Principles on Business and Human Rights (UNGPS) to better understand how we may cause, contribute to, or be directly linked to modern slavery and other human rights impacts through our operations, business relationships and supply chain. We have summarised this in the graphic to the right and documented our modern slavery due diligence and broader risk management initiatives.





# Our Supply Chain

There was no significant change to our procurement profile between the 2020 and 2021 reporting years.

While our 2021 procurement spend decreased by 5% (due to ceasing operations in USA) in 2021 – from \$481.3 million to \$457.9 million – the number of suppliers remained largely unchanged. Over 80% of our spend and three-quarters of our suppliers are based in Australia. The majority of our international suppliers are located in New Zealand, however we also procure from a small number of suppliers in China, Germany, UK, Singapore, Netherlands, Thailand, Italy, Vietnam and Serbia (see map over page). The main categories of goods and services procured from our direct suppliers also remained unchanged (as highlighted in the graphic to the right).

## What we buy

As year-on-year variation in our procurement profile was not significant, we have used our 2020 modern slavery supplier risk prioritisation as the baseline for our enhanced supplier due diligence program. We will refresh our spend profile and supplier modern slavery risk prioritisation dashboard in 2022.

### GOODS



MEATS, POULTRY/  
SEAFOOD



FOOD  
ADDITIVES



AGRICULTURAL  
PRODUCTS



OILS (FISH,  
SUNFLOWER, EMU)



FINISHED  
GOODS



PACKAGING



OFFICE FURNITURE/  
FITTINGS/SUPPLIES

### SERVICES



CLEANING  
SERVICES



GRAPHIC DESIGN/  
PRINTING SERVICES



TRANSPORTATION  
AND LOGISTICS



MACHINERY



PPE AND  
CLOTHING



MAINTENANCE  
SERVICES



LABOUR HIRE



PROFESSIONAL  
SERVICES

# Operational Risks

While the risk of modern slavery conditions occurring within our own operations in Australia is relatively low (given our strict adherence to regulatory requirements, internal policies, and governance processes), we work in known high-risk industry sectors such as meatworks, agriculture and food processing. We acknowledge that there may be risks and vulnerabilities in our operations, particularly where labour hire agencies are used to provide short-term contract and seasonal labour, as well as temporary migrant workers.

We also recognise that there are risks of exposure to modern slavery across our business relationships, including our co-manufacturing arrangements and through procurement of goods and services across our extended supply chain, particularly from suppliers in countries identified as higher risk for modern slavery.

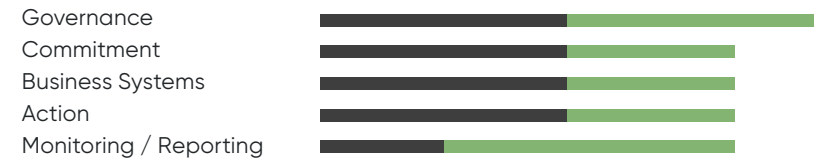
In 2021 we undertook a follow-up modern slavery gap analysis to identify our governance maturity specific to modern slavery. The gap analysis documented our progress across five key business areas:

- management systems
- human resources and recruitment
- procurement and supply chain
- risk management
- customers and stakeholders

The results of our 2020 and 2021 operational modern slavery gap analysis are presented to the right. The green bars highlight improvements made across the various categories in 2021.

While we are pleased with our progress, we acknowledge that we still have work to do, particularly around stakeholder/supplier engagement and exploring opportunities for worker voice technology where contract or labour hire workers may be exposed to increased risk.

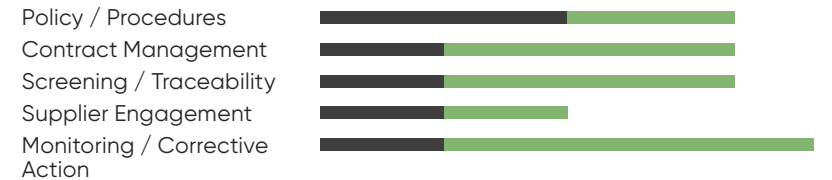
## Management Systems



## Human resources



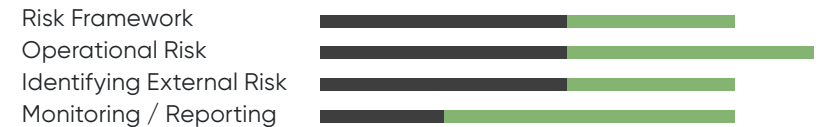
## Supply chain



## Customers/ stakeholder



## Risk management



2020 results depicted in black. 2021 results depicted in green (where improvements made)

# Supply Chain Risks

As year-on-year variation in our procurement profile was not significant, we focussed on implementing our enhanced supplier due diligence program using our [2020 modern slavery risk prioritisation](#) as a baseline (see summary on the right).

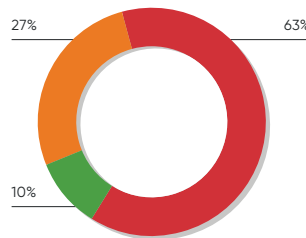
## SUMMARY OF OUR 2020 SUPPLIER RISK PROFILE

### Risk by Spend

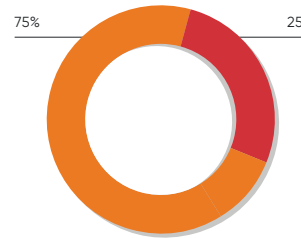
**63%**

of total spend is potentially high risk for modern slavery largely due to our spend on meat, poultry, seafood and agricultural products.

A further 27% of spend is categorised as medium risk for modern slavery and 10% as lower risk.



### Risk by Suppliers



Just over 25% of suppliers have potential high exposure to modern slavery in their operations and supply chains.

Whilst some of our direct suppliers based in Australia may represent a lower risk, goods and services procured from many of our Australian suppliers are sourced from countries with a higher risk for modern slavery.

### Risk by Category

Close to **TWO-THIRDS**

of the direct and indirect materials and services we procure are potentially high risk for modern slavery.

**85%**

of our high risk spend is associated with five high risk categories :

- Meat/poultry/ seafood
- Agricultural products
- Food additives
- Packaging materials
- Finished goods

### Risk by Market

Highest risks are within the ANZ market due to our procurement of potentially high-risk goods and services from industry sectors and businesses demonstrating limited evidence of modern slavery risk management practices.

Most risks in other RPF markets can be attributed to the intercompany manufacturing arrangements and procurement of finished goods by external manufacturers.

We have several potentially high-risk direct suppliers in China and Thailand.

# Supply Chain Risks

We continue to assess our modern slavery risk against four key risk indicators:



## Industry sector

Specific industry sectors deemed as high risk in international and national guidance documentation. This includes sectors with high-risk business models such as use of labour hire workers and outsourcing, seasonality, franchising and aggressive pricing.



## Commodity/product

Specific products and commodities or raw materials deemed as high risk by the US Department of Labor's 2021 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.



## Geographic location

Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI and using the SD Strategies country risk matrix which assesses risks against 13 global indices. High risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State's failure to protect human rights. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.



## Workforce profile

In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where base-skill, vulnerable or migrant labour is used.

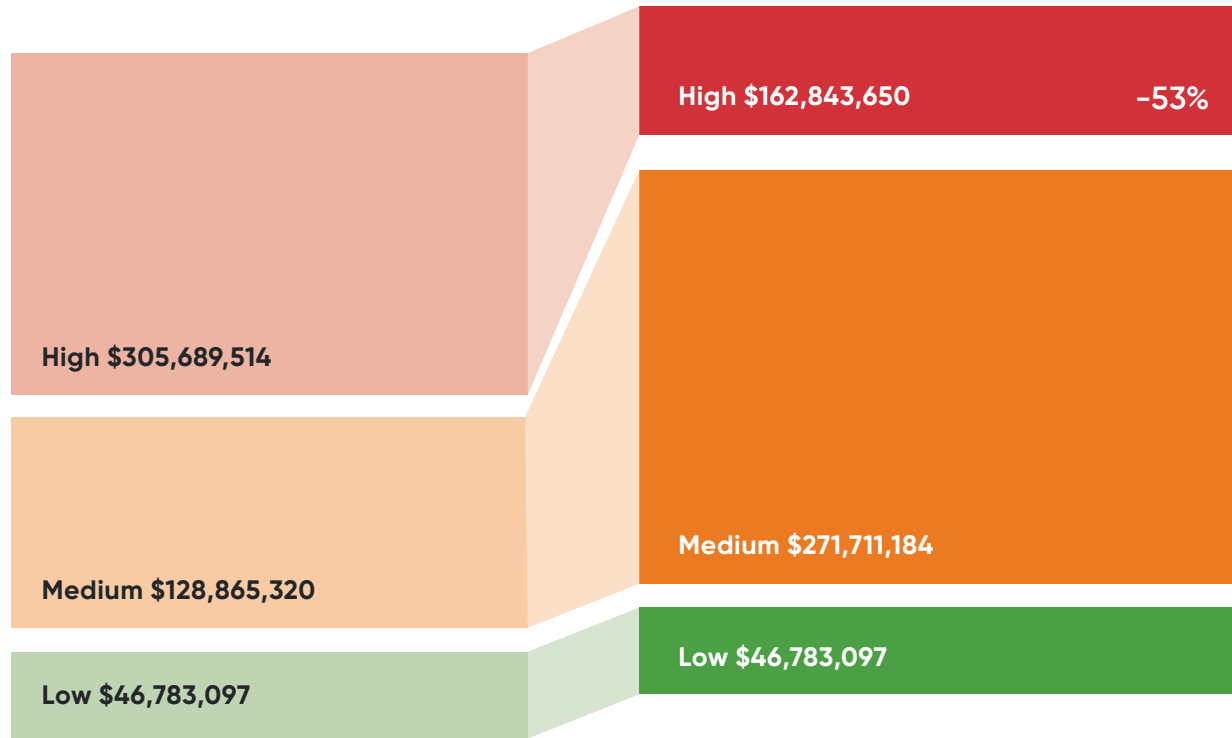


# Supply Chain Risks

In 2021 we extended our supplier due diligence program to an additional 35 potentially high-risk Tier 1 suppliers who together with the 30 suppliers assessed in 2020 account for 80% of high risk spend in 2020 (see Case Study 1).

Supplier due diligence including supplier engagement, self-assessment questionnaires (SAQ's), review of documentation, and implementation of corrective action requests undertaken with our 55 highest risk, highest priority suppliers across 2020 and 2021 resulted in a 53 percent reduction in spend classified as high risk (based on our 2020 baseline spend). Two-thirds of suppliers initially classified as potentially 'high risk' were risk assessed to 'medium risk' following implementation of our comprehensive due diligence processes. This equates to a 69% reduction in high risk spend across the 55 suppliers assessed.

POTENTIAL RISK RATING v ADJUSTED RISK RATING (TOTAL SPEND)



**Legend:**



# Tier 2 Supplier Risk

## Risk by Category

Working with our Tier 1 (direct) suppliers, we identified significant potential modern slavery risk among our Tier 2 (indirect) suppliers. Thirty-one of the 55 suppliers who completed our supplier survey, provided the names of suppliers used to fulfil contractual obligations with RPF (i.e our Tier 2 suppliers). Unsurprisingly, in a specialised sector such as pet food manufacturing, eleven of the 74 Tier 2 suppliers named are also direct (Tier 1) suppliers to RPF.

A high-level risk assessment (based largely on industry sector and category of supply) was undertaken of the Tier 2 suppliers. Based on the goods and services provided, over 90% of Tier 2 suppliers are potentially high risk for modern slavery (Figure 1).

The five categories with the largest number of identified Tier 2 suppliers are:

- Meat/poultry and seafood
- Packaging – fibre
- Product materials, fittings and consumables (largely related to packaging materials)
- Agricultural products
- Packaging – films

This is outlined further in Figure 2 to the right.

This initial high-level assessment of our Tier 2 suppliers demonstrates the considerable level of potential modern slavery risk in our extended supply chain and the importance of engaging suppliers beyond our direct or Tier 1 suppliers when implementing modern slavery due diligence processes.

Figure 1: Risk Assessment of Tier 2 Suppliers (% Total)

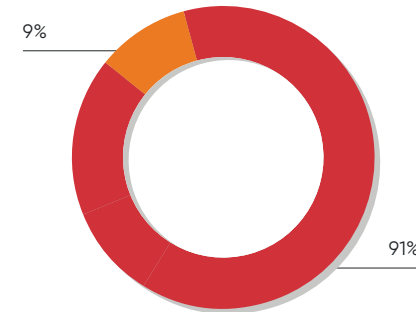
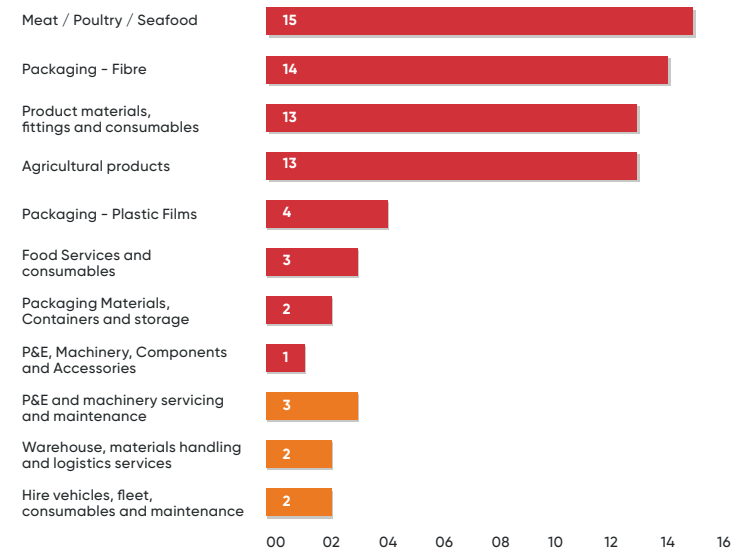


Figure 2: Goods and Services Provided by Tier 2 Suppliers and Category Risk



# Case Study 1: Enhanced Supplier Due Diligence Program

Our 2020 Modern Slavery Statement outlined our modern slavery due diligence program which focussed on our highest risk Australian and New Zealand based suppliers (who collectively accounted for 50% of high-risk procurement spend). Goods and services procured from suppliers who completed the 2020 survey included raw materials (meats, seafood and agricultural products), packaging, and other goods and services such as finished goods, transport, plant and equipment, ICT hardware and others.

Suppliers were assessed across three key business areas: Operations, Workforce & Remedy; Governance & Due Diligence; and Risk Management.

In 2021 we extended our supplier due diligence program, with an additional 31 ANZ suppliers and four international suppliers (based in China and Thailand) completing the survey. These suppliers, together with the suppliers assessed in 2020, account for approximately 80% of our potential high risk spend based on our 2020 procurement spend profile.

A snapshot of our 2020 and 2021 supplier due diligence program is provided to the right.

Findings in 2021 are similar to those for assessments undertaken in 2020:

- Participating suppliers rated highest in the Operations, Workforce and Remedy category, however it was noted that few have effective processes in place to ensure remedy is provided where instances of modern slavery are identified.
- The Governance and Due Diligence category was poorly addressed with 95% of respondents ranked as "Ineffective" and many organisations not providing tangible evidence of active policies and codes of conduct.
- The Risk Management category was also poorly addressed, with most suppliers indicating a lack of integration of modern slavery risk management into enterprise risk management processes.

Each participating supplier was provided with a comprehensive risk-based report and improvement recommendations. Our Procurement Category Managers are working with suppliers to develop and implement Corrective Action Plans (CAPs) based on the recommendations made. A high-level assessment of key issues identified is provided in Case Study 2.

## OUR ENHANCED SUPPLIER DUE DILIGENCE PROGRAM IN NUMBERS:

### 2020

Total ANZ suppliers invited:	No. of suppliers completed survey:	Completion rate:
22	20	90%
Percent of high risk spend assessed:	Corrective Actions 2020:	
50%*	197	

### 2021

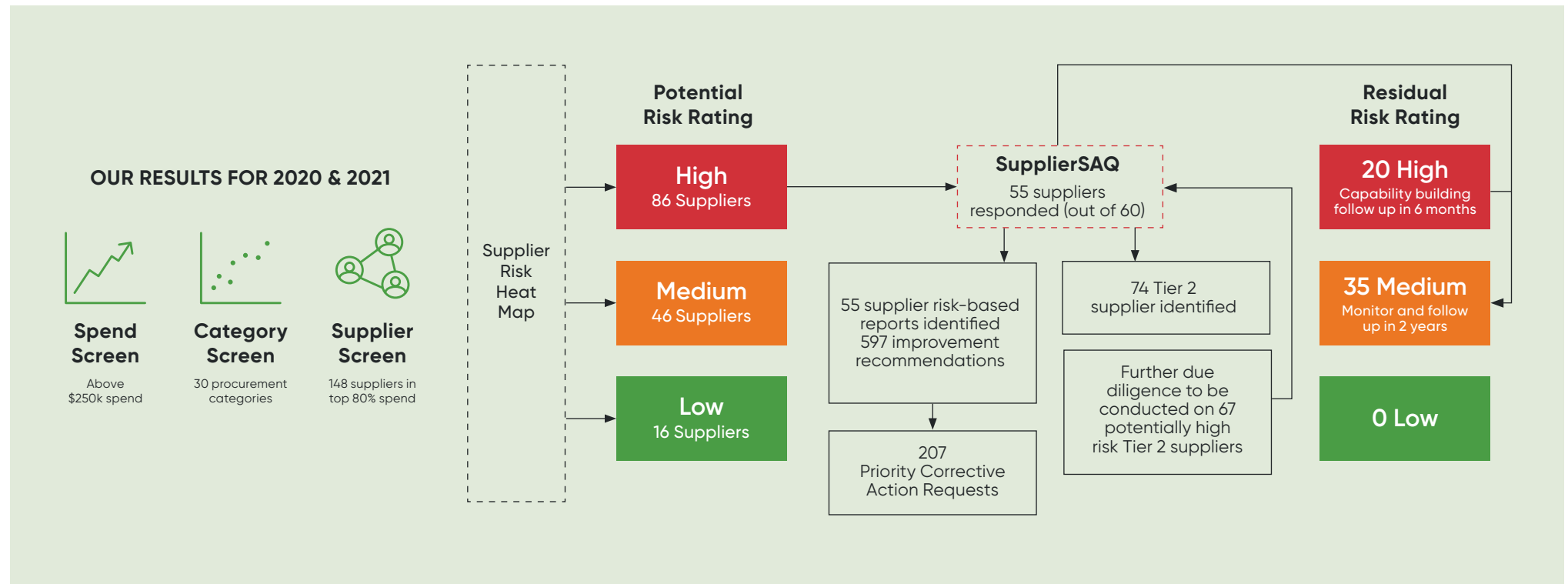
Total ANZ suppliers invited:	No. of suppliers completed survey:	Completion rate:
38	35**	92%
Percent of high risk spend assessed (cumulative):	Corrective Actions 2021:	
80%*	400	

\*Percent of high risk spend assessed within 200 baseline

\*\* 31 ANZ suppliers and 4 international suppliers completed the survey

# Tier 2 Supplier Risk

Our supplier due diligence and risk screening process and outcomes for 2020 and 2021 is illustrated in the infographic below.





# 3 year plan

In 2021 our focus was on further integrating our modern slavery risk management processes into company policies, procedures, and operations. We also endeavoured to better understand the risks of modern slavery presented by our highest spend suppliers and undertook both shallow-dive and deep-dive desk top risk assessments of our priority suppliers. Importantly we also updated our 3 year road map to the right:

## YEAR 3 (2022) Review & Extend

- Refresh supplier risk prioritisation and dashboard
- Engage and educate highest risk suppliers and roll out RPF supplier eLearning module
- Extend supplier risk assessments to priority suppliers
- Ensure implementation and review of supplier corrective action plans
- Conduct ongoing assessment of internal and external stakeholder awareness
- Identify relevant NGOs and other stakeholders and develop draft remedy framework
- Map potential modern slavery risk of a priority RPF product across the entire supply chain
- Publish Modern Slavery Statement and Supplier Code of Conduct on website

## YEAR 4 (2023) Assess, Align, Improve

- Align modern slavery risk management program with outcomes of legislative review
- Engage relevant NGOs and stakeholders and implement remedy framework
- Research and identify worker voice data collection opportunities
- Implement program to ensure traceability back to source for priority high-risk goods
- Extend supplier eLearning to lower spend Tier 1 and priority Tier 2 suppliers
- Extend modern slavery supplier risk assessments to highest risk Tier 2 suppliers
- Undertake human rights impact assessment aligned to UN Guiding Principles on Business and Human Rights

## YEAR 5 (2024) Best in Class

- Ensure implementation and review of Tier 2 supplier corrective action plans
- Continue to review and report on modern slavery risks
- Educate industry peers on modern slavery / human rights risks and risk management initiatives
- Expand reporting to capture broader human rights risks
- Review and update modern slavery action plan and strive for continuous improvement

# Modern Slavery Risk Management

Our 2021 modern slavery risk management actions are outlined below:

## Governance & Policies

- We include Modern Slavery risk management in monthly procurement updates to the ELT and quarterly updates to our Board Risk & Sustainability (R&S) Committee.
- We developed a draft Human Rights Policy that applies to all officers, employees, contractors and suppliers of RPF. This will be rolled out in 2022.
- We have developed a draft Responsible Sourcing Strategy to be further refined and rolled out in 2022 as part of a more comprehensive ESG program.

## Risk Management

- Modern slavery was specifically included under Responsible Sourcing in our Risk Register in 2021 and continues to be actively managed under a broader company-wide ESG risk framework.
- We incorporated modern slavery risk management objectives into specific roles within the business and developed KPIs to track performance annually.
- Our maintenance management software (MEX) was customised to allow for modern slavery risks to be effectively captured and reported against.

## Supplier Engagement and Due Diligence

- We developed and distributed a modern slavery fact sheet to all suppliers.
- We reviewed, updated, and distributed our Supplier Code of Conduct to all suppliers. The updated Code includes modern slavery and other human rights requirements, and our standard contract terms and conditions require adherence to the Code.
- We identified our highest priority and potentially highest risk suppliers for further due diligence.
- We conducted due diligence assessments on an additional 35 suppliers in 2021, 31 based in ANZ and four international suppliers based in China and Thailand bringing the total to 55 over 2020 and 2021 reporting years. Risk based reports and corrective action plans were issued to all suppliers.

As part of our supplier due diligence initiative, our Procurement Category Managers (CRMs) worked with all 55 suppliers to ensure corrective actions are implemented. Some 70% of review meetings with high-risk suppliers have been conducted and KPIs included in the Supplier Relationship Management (SRM) program for key suppliers.

## KEY ELEMENTS OF OUR ENHANCED SUPPLIER DUE DILIGENCE PROGRAM:



Supplier prioritisation using 2020 spend baseline and same modern slavery risk indicators.



Engagement and education of our potentially highest risk/highest priority suppliers.



Rolling out Self Assessment Questionnaire (SAQ) to priority suppliers including a requirement for the provision of credible evidence to support SAQ responses.



Engagement of external experts to assess and rate SAQ responses based on proven risk-control effectiveness definitions and risk rankings.



Development of customised Corrective Action Plans (CAPs) for each participating supplier focusing on identified gaps and opportunities with the involvement of RPF's Procurement Category Managers to build trust and deepen supplier relationships. Labour suppliers were assessed by an external provider before award of supply in 2021. Our Procurement Category managers worked closely with temporary labour providers to review their commitment and capability to manage labour rights and human rights risks

# Case Study 2: Analysis of Corrective Actions

As part of our enhanced supplier due diligence program (see Case Study 1) we have assessed a total of 55 suppliers for modern slavery risk in the last two years. Of these, 51 are based in ANZ, three in China and one in Thailand. Each supplier received a comprehensive risk-based report with improvement recommendations.

We ranked our suppliers' modern slavery risk management initiatives according to four risk-control effectiveness ratings (Ineffective; Partially Effective; Substantially Effective and Totally Effective). External experts analysed supplier responses and supporting documents across three business areas (Operations, Workforce & Remedy; Governance & Due Diligence; and Risk Management) and assigned effectiveness ratings to each.

A total of 597 improvement recommendations/ corrective actions were identified across the suppliers surveyed, with an average of eight to ten corrective actions identified per supplier. Some 207 priority corrective actions were documented (where suppliers were ranked as ineffective for a particular category) as illustrated in Figure A. Notably, no suppliers were ranked as Totally Effective in any category.

Figure B provides a summary of the categories of findings and corrective actions as a percentage of all suppliers surveyed.

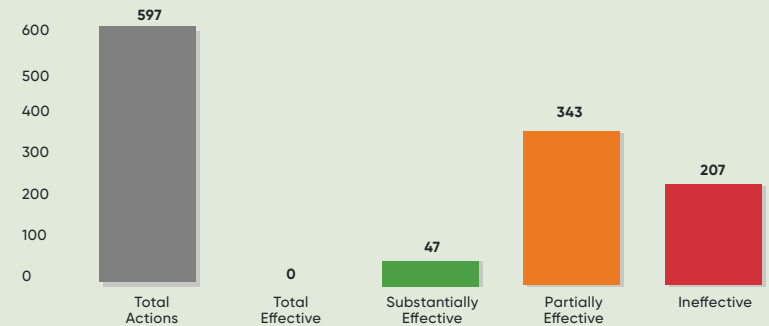
## KEY FINDINGS INCLUDE:

- Less than one quarter (23%) have effective (documented) whistleblower and grievance mechanisms in place.
- Only 2% of the suppliers surveyed have meaningful remedy procedures in place that can be implemented should instances of modern slavery be identified in their operations or supply chains.
- Just over 10% of suppliers have undertaken effective operational or supply chain modern slavery risk assessments.
- Less than one-quarter of suppliers surveyed reference modern slavery in supplier contract clauses.
- Only one-third of suppliers could demonstrate having modern slavery risk management policies and procedures in place.

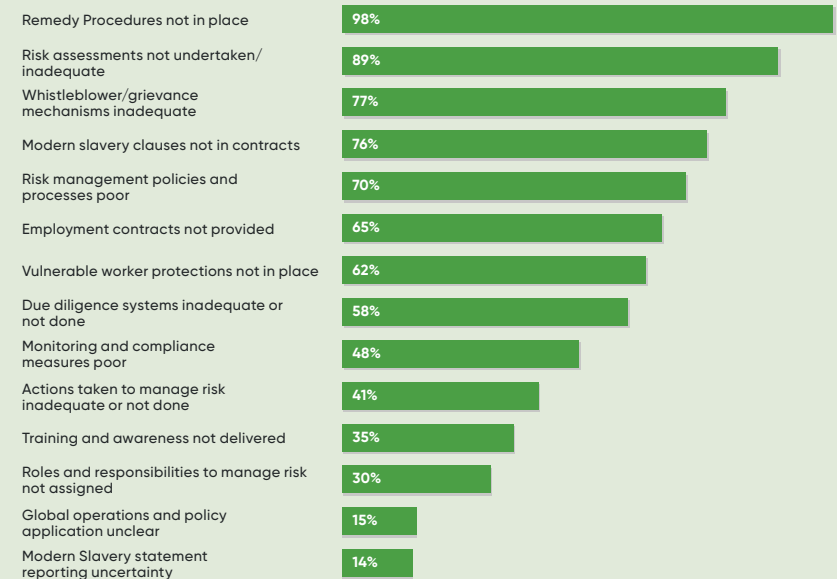
Among those suppliers who indicated they employ (or use) vulnerable workers, 62% were unable to demonstrate clear mechanisms in place for protecting these workers.

Our Procurement Category Managers continue to work with suppliers to implement Corrective Action Plans (CAPs) based on these recommendations.

Number of Recommended Correction Actions for all Suppliers (Figure A)



Categories of findings by Percentage of Suppliers (Figure B)



Acknowledging the increased risk posed by labour hire providers, all new temporary labour suppliers were assessed by an external provider before award of supply in 2021.

Our Procurement Category managers worked closely with temporary labour providers to review their commitment and capability to manage labour rights and human rights risks and implement corrective action plans (see case study 3).

### Case Study 3: Assessing Labour Hire Sector Risks in our Supply Chain

The labour hire sector – represented by companies providing labour on a casual, short term or contract basis – presents a higher level of potential modern slavery risk in Australia and internationally.

We directly engage labour hire companies to provide workers for our meat processing and manufacturing facilities. Workers are engaged for casual work or during times of increased production (seasonal work).

Modern slavery questionnaires were sent to four labour hire providers before award of supply in 2021. Analysis of survey responses and review of supporting documentation resulted in three suppliers being ranked as 'Medium Risk' and one as 'High Risk'.

Improvement recommendations included a requirement for labour hire providers to:

- Provide additional information on the numbers, home countries and types of overseas workers being recruited for work in Australia, including outlining the methods of recruitment (or use of migration agents).
- Enhance systems and processes for communicating workers' rights to migrant workers and provide support to workers where required.
- Increase transparency around rates of pay, wage deductions and compliance with workplace laws and regulations.
- Ensure grievance processes are effectively communicated to temporary migrant workers and that all workers are provided with access to remedy should instances of modern slavery or worker exploitation be identified.
- Continuously improve risk management systems to better identify, assess and address modern slavery risks.

A total of 39 improvement recommendations/ corrective action requests were issued to the four labour hire suppliers. Our Procurement Category Managers continue to work with our labour hire providers to ensure corrective actions are implemented.

It is also worth noting that approximately 40% of the 55 suppliers who participated in our supplier assessments indicated they use labour hire providers to source temporary migrant workers and workers on Government programs such as the Pacific Australia Labour Mobility scheme.

We will be focusing our due diligence efforts on risks posed to these vulnerable workers in coming years, including exploring opportunities to implement worker voice initiatives in factories and on farms where seasonal workers are used.

While the majority of our suppliers are located in Australia, we acknowledge the increased risk posed by our international suppliers. We worked closely with four priority international suppliers (who together account for 95% of spend in high risk countries) to assess and address their systems and processes for managing modern slavery risks. Suppliers participated in deep dive supplier assessments, answered more than 50 questions and provided supporting documentation where it existed. Following assessment of responses and documentation, two suppliers were ranked as high risk and two were ranked as medium risk (see case study 4).

## Case Study 4: Working with our International Suppliers to Manage Risk

We source goods and services that support our operations from several countries and across different industry sectors.

Supplier risk prioritisation undertaken in 2020 and again in 2021 identified several international suppliers located in countries that, according to the Global Slavery Index and SD Strategies' Country Risk Ratings, present a higher potential risk for modern slavery.

We invited four suppliers of finished goods and packaging to complete a deep-dive modern slavery due diligence survey. Three of these suppliers are in China and one is based in Thailand. Analysis of survey responses and review of supporting documentation resulted in two suppliers being ranked as 'Medium Risk' and two as 'High Risk'.

Improvement recommendations included a requirement for suppliers to:

- Increase transparency of the scope and scale of their operations including any outsourced operations both in-country and transnationally.
- Provide evidence that labour rights policies are fully implemented and that workers' rights including those of temporary migrants, women and other vulnerable people are respected.
- Deliver training and awareness programs on basic workplace laws and labour rights requirements, relevant company policies, and grievance and remedy processes to all workers.
- Document how compliance with workplace laws and regulations is ensured, especially in relation to workplace safety and worker welfare.
- Enhance transparency of operational and supply chain modern slavery risk assessments and make findings available to RPF.

- Improve systems and processes to protect workers' rights including in dormitory accommodation.

**A total of 80 improvement recommendations/ corrective action requests were issued to the four suppliers.**

Our Procurement Category Managers are working closely with our international suppliers to educate them about modern slavery (as required) and ensure corrective actions are implemented.

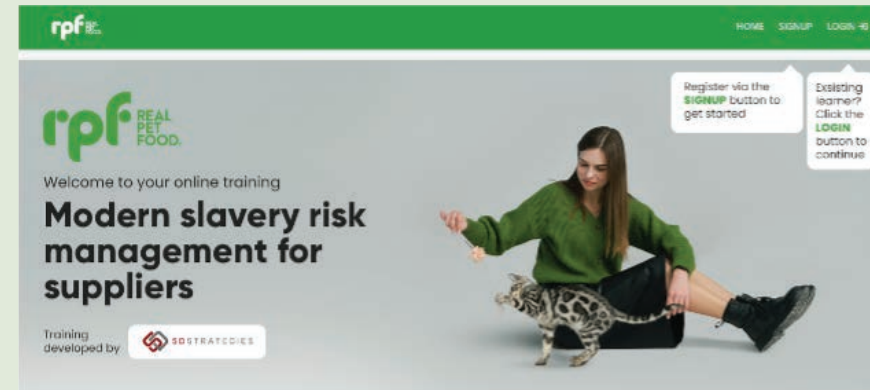
- As part of our Tier 1 supplier engagement, we identified and prioritised 74 Tier 2 suppliers. Of these, 67 are potentially high risk. Further due diligence of Tier 2 suppliers is planned for 2022.
- We developed a supplier modern slavery eLearning module which was rolled out to 100% of our high-risk suppliers (see Case Study 5).

## Case Study 5: Engaging and Educating our Highest Risk Suppliers

Over the past two years we have been working closely with our priority (highest potential risk) suppliers to review the policies, systems, and processes they have in place to manage modern slavery risks and to provide improvement recommendations and corrective actions where required.

One of our key focus areas remains ongoing supplier engagement and due diligence. This includes ensuring our suppliers have a detailed understanding of modern slavery risks and impacts and the knowledge and skills to assess and address potential and actual risks in their operations and supply chains.

In 2021 we developed a bespoke modern slavery risk management eLearning module for RPF suppliers. The module is highly interactive and professionally narrated, includes knowledge checks and quiz questions, and links to relevant RPF policies and



procedures as well as to our Modern Slavery Statement.

Topics include:

- What is modern slavery?
- Modern slavery legislation
- Global supply chain risks
- Customer expectations
- Responding to instances of modern slavery

74 suppliers (making up 90% of our high risk spend) were invited to complete the module in early 2022. The module will be rolled out to our remaining high-risk suppliers as well as to identified medium risk and select Tier 2 suppliers during 2022.



# Internal Aware Program

## Internal Engagement, Education and Training

- We formalised our Modern Slavery Working Group to oversee and implement our modern slavery risk management program and action plan.
- We developed an internal modern slavery awareness video which was rolled out to all staff across the organisation.
- A modern slavery eLearning module is also provided as part of our employee induction program through SAP Litmos.
- We developed modern slavery refresher training for our Board, which will be rolled out annually.

## Grievance Mechanisms & Remedy

- We updated our Whistleblower Policy to include conduct that impacts on the human rights of workers in our operations, business partnerships and supply chain as 'reportable conduct'.
- To support our Whistleblower process, we implemented an externally managed and accessible Speak Up mechanism ([realpetfood.whisppli.com/lp/speakup](https://realpetfood.whisppli.com/lp/speakup)) which enables employees and external parties to anonymously report issues (including human rights breaches, health and safety impacts, and instances of bullying and discrimination) occurring at RPF sites or elsewhere.
- In 2021 we started to map community partners across the jurisdictions in which we operate and will engage these partners in 2022 to develop a robust remedy pathway that prioritises the safety and rights of victims.

**Initial awareness of Modern Slavery was key to educating our current workforce. Importantly we are now covering this through the new starter induction program.**

## Case Study 6: Expanding our Grievance Mechanisms

Our commitment to ethical practices and honest relationships is an important reason our co-workers, customers, suppliers, and other stakeholders choose to work with us. A key method for tackling Modern Slavery is to ensure all workers, including those working for contractors and suppliers, have a mechanism to safely, and confidentially, raise concerns about unlawful, unethical or undesirable conduct.

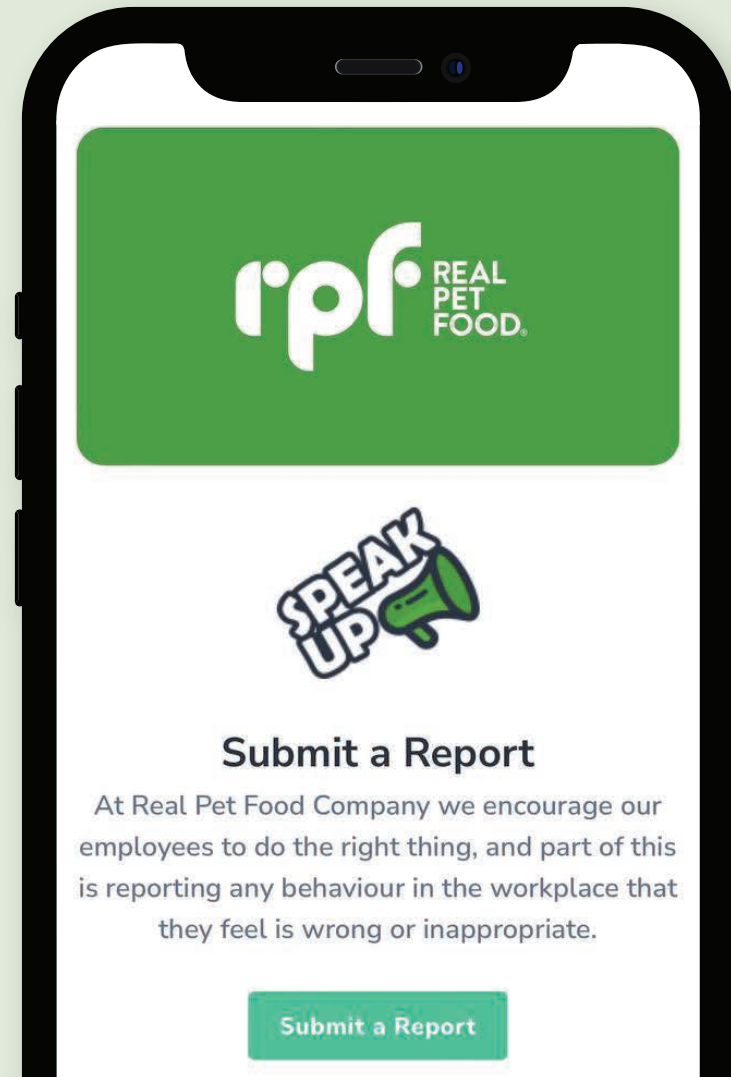
This includes conduct that impacts on the human rights of workers within our operations, business partnerships and supply chain. As such, we encourage whistleblowers to make a disclosure of wrongdoing with a genuine belief that it's true. Whistleblowers may do so anonymously if they choose, and our Whistleblower Policy (updated in 2021) provides various options for confidentially reporting inappropriate conduct.

Recognising the importance of providing a widely accessible, timely and confidential grievance mechanism, we also implemented a 'Speak Up' process in 2021.

The platform, which is managed externally by Whispli, enables all stakeholders (including workers in our supply chain) to make reports easily and confidentially.



Scan this QR code to easily access the portal



Our modern slavery risk management action plan and due diligence processes will be reviewed regularly as part of our corporate sustainability (ESG) and risk management reviews. Our risk assessment procedure requires annual review of all risks and controls, including modern slavery risks identified in our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain and continue to work on the best approach to measuring the effectiveness of our actions.

At RPF, we consider an effective response to modern slavery risk management to include:

## Strong Modern Slavery Governance

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A strong modern slavery governance framework, and commitment to accurately identify and remedy where appropriate, modern slavery vulnerabilities and cases.

## Assessment, Management & Reporting

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Effective and transparent assessment and reporting of modern slavery risks across our operations and supply chain, including tracking the number of modern slavery risks identified, issuing corrective action requests to our suppliers, and ensuring improvements are implemented.

## Engaged Staff and Suppliers

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Engaging with our suppliers beyond contractual obligations and awareness of our Responsible Sourcing Strategy. This includes empowering our procurement team members to have the hard conversations with our potentially highest risk suppliers and building trusted relationships to ensure our expectations are met, and corrective action requests are implemented in timeframes acceptable to both parties.

# Effectiveness Indicators

In 2021, we assessed the effectiveness of our actions against the following key indicators, both qualitative and quantitative.

We recognise that we have more work to do to effectively measure and assess both process and outcomes indicators.

Area of Focus	Activity	Qualitative Indicators	Quantitative Indicators
<b>Governance &amp; Policies</b>	<ul style="list-style-type: none"> <li>Modern slavery included in monthly procurement updates to the ELT and quarterly updates to Board Risk &amp; Sustainability Committee</li> <li>Draft Human Rights Policy</li> <li>Supplier Code of Conduct and supplier Ts &amp; Cs updated</li> <li>Responsible Sourcing Strategy drafted</li> </ul>	<ul style="list-style-type: none"> <li>Standing item in ELT and Board R&amp;S Committee meetings</li> <li>Enhanced understanding and discussion of human rights and labour rights risks and consideration in company decision making</li> <li>Broad agreement across organisation of Responsible Sourcing Strategy and willingness to implement</li> </ul>	<ul style="list-style-type: none"> <li>Number of modern slavery, labour rights and human rights issued raised or questions asked in management meetings</li> <li>Percentage policies reviewed, updated, and integrated</li> <li>Number of contracts with updated Ts &amp; Cs</li> </ul>
<b>Risk Management</b>	<ul style="list-style-type: none"> <li>Follow up maturity assessment undertaken</li> </ul>	<ul style="list-style-type: none"> <li>Board review and update of risk framework</li> <li>Annual maturity assessment completed</li> <li>Increased understanding across workforce on potential modern slavery risks in different operating environments</li> </ul>	<ul style="list-style-type: none"> <li>Number of human rights or labour rights risks identified and documented in risk register</li> <li>Number of risk mitigation actions implemented</li> <li>Number of modern slavery maturity targets achieved</li> </ul>
<b>Supplier Engagement &amp; Due Diligence</b>	<ul style="list-style-type: none"> <li>Shallow and deep dive supplier risk assessments</li> <li>High risk supplier screening</li> <li>Tier 2 supplier identification</li> <li>Supplier qualification processes</li> <li>Development of RPF specific eLearning module for suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Engagement and education of suppliers</li> <li>Number of highest risk suppliers invited to complete shallow and deep dive assessments</li> <li>Supplier feedback on due diligence process and benefits</li> <li>Percentage of review meetings undertaken</li> </ul>	<ul style="list-style-type: none"> <li>Percentage suppliers engaged and trained</li> <li>Percentage supplier responses to shallow dive survey</li> <li>Percentage suppliers responding to deep dive assessments</li> <li>Number of corrective action requests issued and completed</li> <li>Number of KPIs included in the SRM program for key suppliers</li> <li>Number of suppliers completing eLearning module</li> </ul>
<b>Internal Engagement, Education &amp; Training</b>	<ul style="list-style-type: none"> <li>Employee, management and executive engagement and training</li> </ul>	<ul style="list-style-type: none"> <li>Staff participate in training</li> <li>Enhanced organisational awareness of modern slavery risks – including increased discussion among all personnel</li> <li>Increased Board and Executive interest in and support of modern slavery risk management program</li> </ul>	<ul style="list-style-type: none"> <li>Percentage relevant staff trained</li> <li>Number of Board engagements / presentations in 12 months</li> </ul>
<b>Grievances Mechanisms and Reporting</b>	<ul style="list-style-type: none"> <li>Whistleblower Policy</li> <li>Speak Up platform</li> <li>Modern Slavery Statement</li> </ul>	<ul style="list-style-type: none"> <li>Whistleblower Policy widely distributed</li> <li>Speak Up platform actively communicated</li> <li>Percentage of issues effectively addressed</li> <li>Alignment of grievance mechanism to UNGPs</li> <li>Modern Slavery Statement submitted on time</li> </ul>	<ul style="list-style-type: none"> <li>Total number of issues raised</li> <li>Percentage of issues effectively addressed</li> <li>Number of stakeholder engagements held on grievance and remedy</li> </ul>

# Reporting Entities

All entities under the control of RPF operate under a common and consistent governance framework that raises awareness and embeds a consistent approach to addressing modern slavery risks in its operations and supply chains.

All entities share the same executive leadership team, who have consulted in and contributed to the drafting of this Statement.

Topco Investments Australia Pty Ltd

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Topco Investments Pte Ltd (Singapore)

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RPF Bid Co Pty Ltd

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RPF (Shanghai) Limited

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Real Pet Food Company (Hong Kong) Ltd

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Real Pet Food Company Singapore Pte Ltd

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Real Pet Food Company (Shanghai) Co. Ltd

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Real Pet Food Company Pty Ltd

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Real Pet Food Company Ltd (NZ)

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RPF BidCo Pty Ltd

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Game Meat Processing Pty Ltd

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Benefit Natural Pet Food Ltd (UK)

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Australian Pet Brands Pty Ltd

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Pin Whistle Pty Ltd

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RPF Group Limited (UK)

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People for Pets Pty Ltd

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VIP Petfoods (Aust.) Pty Ltd

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Vet's Best Products Pty Ltd

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VIP Nominees Pty Limited

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Vetco Australia Pty Limited

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Consolidated Manufacturing Enterprise Pty Ltd

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# Our Communities

Our pet parents and the communities they live in are the heart of Real Pet Food. In this day and age consumers are spoiled for choice, and as people begin to better understand their pet's health and nutritional needs, our loyal consumer base continues to grow.

We want our consumers to know that by choosing Real Pet Food products, they're not only making the best choice for their pets, they're also contributing to initiatives that support people, our pets, and our planet.

Our communities play an important role in our lives. In addition to the Community Grants Program that runs at each of our production sites, there are some causes that we support as an organisation that are close to our heart:

## Aussie Helpers

As Australia experienced drought and other natural disasters in regional areas, our Aussie farmers need our ongoing support.

Since 2017 we've been proud supporters of Aussie Helpers, a not-for-profit organisation dedicated to helping Aussie farmers, farming families and farming communities survive through the tough times.

## Greyhound as Pets (GAP)

We are passionate in our belief that every pet deserves a happy home. GAP NSW are a not-for-profit charity aimed at re-homing greyhounds, and to help our greyhound friends make an easier transition into their new homes.

We lend our support to this this fantastic cause by supplying IVORY COAT in all foster and adoption centres, and providing educational materials around the importance of pet nutrition to new pet parents.

## Starlight Foundation

Starlight Foundation's mission is to complement traditional medical treatment by helping young people flourish, build resilience and shape their individuality.

Over 10% of all wishes made through the Starlight Wishes Program are for a puppy or a kitten. As a Gold Partner with Starlight Foundation, we're incredibly proud to be the ones to help bring joy and love to kids and their families by helping grant all pet wishes made.

## Lifeline Foundation

We run initiatives throughout the year that raises funds for Lifeline, a non-profit organisation that provides free, 24-hour telephone crisis support service in Australia.

Volunteer crisis supporters provide suicide prevention services, mental health support and emotional assistance, not only via telephone but face-to-face and online. In 2021 we raised funds via allowing employees to 'buy-back' their old mobile phones when we rolled out new hardware.