



# Anti-Modern Slavery Statement

For the year ending 30 June 2023

PetSure 

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**We encourage anyone with concerns about modern slavery or any other aspect of our business to speak up by contacting our Chief Executive Officer or our independent, confidential and secure whistleblower service. Details are available on our website [petsure.com.au](https://petsure.com.au).**

# About PetSure and this Statement

Our purpose is to improve pet healthcare moments so that dogs, cats and their people can enjoy healthier and happier lives together.

PetSure is the first general insurer in Australia dedicated to pet insurance, underwriting more than 80% of the Australian market, and helping to cover the veterinary treatment costs of more than 4,000 dogs and cats every day.

We are also a pet health technology organisation working across a portfolio of aligned businesses, to make a meaningful difference in collaboration with others in our sector. Our sustainability strategy includes a commitment to transparently reporting on our positive social impact. This Anti-Modern Slavery Statement (Statement) reflects this commitment and is made pursuant to section 14 of the Commonwealth Modern Slavery Act 2018 (the Act).

This Statement is made on behalf of PetSure Holdings Pty Ltd (ACN 606 792 509) (PetSure Holdings) and PetSure (Australia) Pty Ltd (ACN 075 949 923) (PetSure) as joint reporting entities, collectively referred to in this Statement as PetSure.

This is PetSure's first standalone Statement, and it covers all entities that make up the PetSure group during the reporting period 1 July 2022 to 30 June 2023. Prior to this, PetSure was captured in Modern Slavery Statements made by the Hollard Insurance Group.

The assessment of modern slavery risks in PetSure's supply chain, as described in this Statement, includes suppliers procured by PetSure on behalf of its subsidiaries and by the subsidiaries themselves.

All dollar figures presented in this Statement are in AUD.



# CEO's message

We are proud to submit PetSure's first Anti-Modern Slavery Statement as a separate reporting entity under the Act.

As a responsible and ethical business, we recognise the significant harm and injustice caused by modern slavery to vulnerable people around the world. We are committed to making sure that no such exploitation exists within our operations and supply chain. We strive to help people in the communities we serve to feel safe, supported and protected.

This Statement outlines our approach to identifying, preventing, and addressing modern slavery risks and describes the practical steps we are taking to continuously improve. It builds upon existing initiatives to manage modern slavery risk that started when PetSure was part of the Hollard Insurance Group.

Our goal is to ensure that all people involved in our operations and supply chain are treated fairly and with respect, and that our business practices uphold the highest standards of ethical conduct.

We appreciate the commitment of PetSure's first Anti-Modern Slavery Working Group in reviewing our key risk areas, resetting our baseline, and developing an action plan and roadmap.

The Statement was approved by the PetSure Board, as the principle governing body, in December 2023.

Alex Thomas, CEO and Managing Director



# Our values and standards

Our values articulate the behaviours we expect of each other at PetSure and are the foundation of our culture. The [Code of Conduct](#) is available on our website.

Our values and standards represent who we are:

- We are committed to delivering the best possible experience for our pet parents. We acknowledge that every decision and action we make has an impact and strive to make pets and their people our first consideration.
- We're committed to continuously improving and being accountable, both in how we provide our services and how we interact with our pet parents, business partners and the community.
- We value and look after our pet parents, our business partners and each other.
- We're committed to providing a safe and healthy workplace for all our people.
- We embrace the unique diversity of our people, and our culture supports an equitable and inclusive working environment.
- We're curious about the environment in which we work and are eager to learn from others. We respect individual differences, and everyone is treated with dignity, courtesy and respect.
- We represent PetSure honestly and we do business ethically and with integrity. We respect the privacy of our pet parents and each other.
- We're committed to fair and open dealings with our business partners, and we expect our business partners to share PetSure's values.
- We are united in delivering on our promises.
- We have a "zero-tolerance" approach to modern slavery in our business and our supply chains.
- We're committed to engaging people who have capacity, are of legal age to work, and have the free will to consent to work.
- We're committed to a transparent environment that enables PetSure to provide a sustainable future for our people, our pet parents, our partners and the broader community.
- We comply with the law and company policies.

**Our values articulate the behaviours we expect of each other at PetSure and are the foundations of our culture. Developed by our employees, our values highlight that, how we do something is just as important as what we do.**



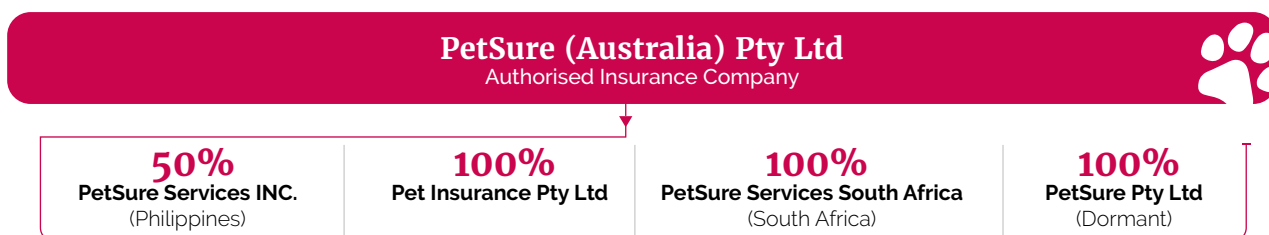
# Our structure, operations and supply chain

## Our organisation

PetSure Holdings is authorised by the APRA as a Non-Operating Holding Company and is the parent entity of the Level 2 Insurance Group. PetSure Australia is the APRA-authorised Level 1 general insurance entity. PetSure Australia is wholly owned by PetSure Holdings. In March 2023, APRA granted PetSure Australia a general insurance licence.

PetSure specialises in product design, pricing and high-volume policy administration and claims management with offices in Sydney, Australia and Johannesburg, South Africa.

PetSure's operations are supported by a controlled joint venture, PetSure Services Inc (PSI), domiciled in the Philippines. PSI, 50% plus one share interest of which is held by PetSure, is considered a material offshore outsource service provider of claims processing, customer service and technology support.



As at 30 June 2023, PetSure directly employed 346 people in professional and support roles, 296 of whom are based in Australia and 50 of whom are based in South Africa. PSI directly employed 463 people, 283 of whom support PetSure and the remainder support other global clients.

PetSure consults with its employees in Australia, South Africa and with senior representatives from PSI to identify and better understand potential in-country sources of modern slavery risk and establish proportional systems and processes to manage, mitigate and continuously improve.

During the period ending 30 June 2023, PetSure undertook a review of PSI and confirmed that the remuneration provided to its workers sits above the estimated equivalent of a living wage in the Philippines. PetSure looked at multiple government and independent organisation benchmarks when evaluating PSI remuneration settings against living wage estimates in the Philippines. The PSI Net Income (Family Equivalent) was calculated based on the total net pay and other monetary benefits paid, and then adjusted to make it comparable to the benchmarks used. PSI compensation elements include net pay, Health Maintenance Organisation/medical insurance, group life insurance, and government mandated and discretionary bonuses.

## Our governance

PetSure recognises the importance of maintaining a high standard of corporate governance in line with our values and to meet expectations of our people, pet parents, partners, veterinarians, regulators, stakeholders, and the wider communities we serve.



# Our structure, operations and supply chain

Supporting our governance framework are constitutions, board and board committee charters, frameworks, policies, processes, procedures and guidelines. Roles and responsibilities have been established for key lines of accountability. Embedding these is a critical component of our governance approach.



## Code of Conduct

The values, standards and behaviours expected of our partners, suppliers, directors and employees; designed to enable ethical, fair and compliant business practices.



## Whistleblower Policy

Committed to high standards of conduct and ethical behaviour in our business activities, and in promoting and supporting a culture of honest and ethical behaviour. We encourage confidential reporting of suspected unethical and illegal activities so anyone can make a report without fear of intimidation, disadvantage or reprisal.



## Risk Management Strategy

Focused on financial and non-financial risks to responsibly manage risks across our operations, to manage the expectations of customers, stakeholders and communities, and the impact of risks on strategic objectives.

## Outsourcing Policy

Reflects the practices that are in place to manage risks associated with material outsourced activities to ensure risks are properly managed and subjected to appropriate due diligence.



## Compliance Framework

Designed to have the necessary systems, resources, processes, and controls in place to manage compliance risk.

## Our operations

Established in 1999, PetSure is Australia's pet insurance market leader. For more than 20 years, we have demonstrated our commitment to working with pet owners, veterinarians, and partners to provide the best possible healthcare outcomes for pets.

We are an underwriting management agency. At our core, are a team of passionate pet lovers committed to working with veterinary teams to help provide the best possible health outcomes for pets. The underwriting component of our business powers the pet insurance propositions of more than 25 brands.

PetSure is also a leader in pet insurance **claims processing**, assessing over a million claims from across Australia and New Zealand each year.

Our innovative payment solution GapOnly® is a paperless claims service whereby a customer can obtain claims approval within minutes and simply pay the gap, while still at the vet clinic. GapOnly® is transforming the claims experience with less upfront out of pocket expenses for the pet parent, now available in 1000+ participating vet clinics and specialist hospitals Australia-wide.

And now, PetSure is evolving to become much more than an Australian underwriter, pet insurer and claims processing enterprise. We are a **pet health technology** organisation working across a portfolio of aligned businesses, including tele-health, in service of our vision for a better life for pets and their people.



# Our structure, operations and supply chain

## Our supply chain

PetSure's total annual procurement spend for the year ending 30 June 2023 was \$92.2 million with 441 direct (Tier 1) suppliers across 27 goods and services categories. The Australian operations account for ninety per cent (90%) of our procurement spend with South Africa and the Philippines accounting for 7 per cent and 3 per cent of spend, respectively.

Further work will be undertaken in subsequent reporting periods to better understand our extended supply chain and modern slavery risks with indirect (Tier 2) suppliers.



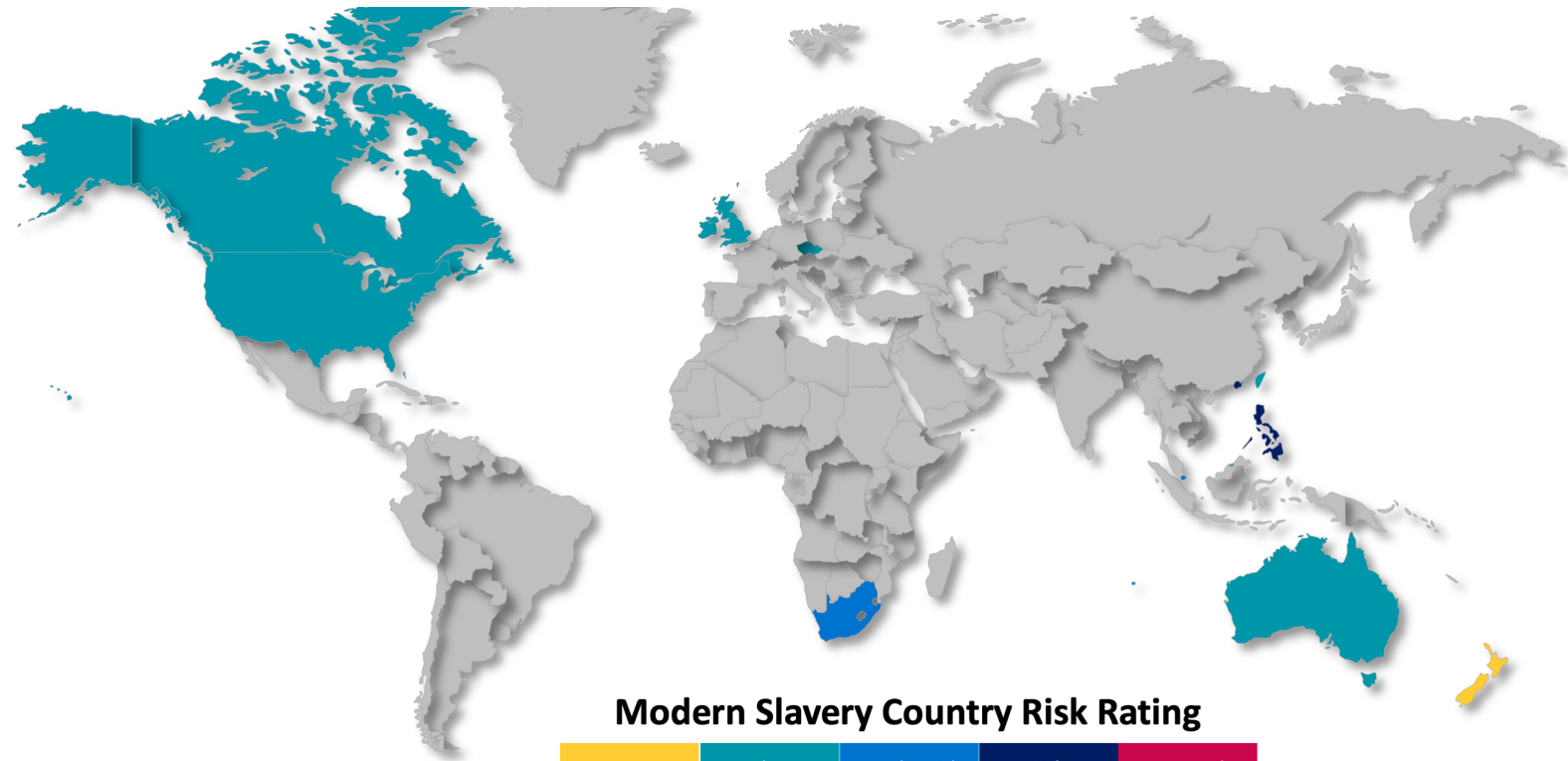
Our supply chain consists almost entirely of goods and services that support our core insurance business with office-based operations and support. Nearly two-thirds (59%) of our spend is on corporate expenses and non-procurement spend.

## Key goods and services procured

Procurement category	Per cent total spend
Corporate expenses and non-procurement spend	59%
ICT Software, networking and support services	14%
Professional services and consulting	13%
Print, mail and document management	4%
Building and construction services	3%
Real estate and facility management	2%
Government fees	2%
Recruitment services	2%
Other goods and services	1%



# Global supplier map



## Modern Slavery Country Risk Rating



© SD Strategies Modern Slavery Risk Index \* Top five categories by spend.

PetSure sources goods and services from twelve countries with 74% of total procurement spend with suppliers based in Australia or global companies that have a presence here.

Almost all (99%) of spend with international suppliers is with suppliers located in the Philippines, South Africa, New Zealand, the United Kingdom and the United States. The remaining one percent (1%) of spend is with suppliers located in Canada, the Czech Republic, Hong Kong (SAR), Ireland, Singapore, and Taiwan.

For each country, the visual shows the number of suppliers, percentage of total spend in each country and the main categories of goods and services procured. The map provides an indication of modern slavery risk in each country based on the SD Strategies Modern Slavery Country Risk Rating Index, which assesses country risk against 13 indices.

Country	Suppliers	Percentage of Total Spend	Main Categories
<b>Canada</b>	9 suppliers	<1% of total spend	ICT software Professional services Recruitment services
<b>United States</b>	11 suppliers	<1% of total spend	Corporate expenses / non-procurement spend ICT software Professional services
<b>Czech Republic</b>	1 supplier	<1% of total spend	ICT software
<b>Ireland</b>	1 supplier	<1% of total spend	ICT software
<b>United Kingdom</b>	4 suppliers	1% of total spend	ICT software Professional services
<b>South Africa</b>	32 suppliers	7% of total spend	Building and construction Corporate expenses / non-procurement spend ICT software Recruitment services Travel expenses*
<b>Taiwan</b>	1 supplier	<1% of total spend	Professional services
<b>Singapore</b>	3 suppliers	<1% of total spend	ICT software Professional services
<b>Australia</b>	327 suppliers	74% of total spend	Corporate expenses / non-procurement spend Government fees  ICT software Print, mail and document management Professional services*
<b>Hong Kong (SAR)</b>	2 suppliers	<1% of total spend	Recruitment services Professional services
<b>Philippines</b>	44 suppliers	16% of total spend	Corporate expenses/non-procurement spend ICT hardware ICT software Real estate/facility management Travel expenses*
<b>New Zealand</b>	6 suppliers	1% of total spend	Advertising, media and promotions Corporate expenses / non-procurement spend Professional services

# Risks of modern slavery

*Modern slavery risk occurs when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage.\* It's about the risk posed to people in the communities in which we operate, as a result of our operations, supply chains, and other business activities.*

Our initial focus has been on deepening our understanding of potential modern slavery risks across PetSure's operations and supply chain and reviewing existing due diligence efforts among suppliers prioritised by spend. PetSure recognises that there may be risk of modern slavery practices amongst our lower spend suppliers and our extended supply chain and we will move our focus to these in future years. We also acknowledge that modern slavery related risks associated with PetSure's operations and supply chains in South Africa and the Philippines are inherently higher than those related to our business in Australia.

We have utilised the United Nations Guiding Principles on Business and Human Rights (**UNGPs**) to inform our approach. The UNGPs establish corporate responsibility to respect human rights and the 'Cause, Contribute, Directly-linked' continuum, which the guidance to the Australian Modern Slavery Act adopts.

PetSure has an Anti-Modern Slavery Working Group comprising senior representatives of the organisation from legal, risk, finance, information technology, operations, people, communications and governance. Our Anti-Modern Slavery Working Group completed an awareness survey, the results of which indicated that 90% of members rate the relevance of modern slavery to PetSure's operations as either 'moderate' or 'high'. Most were able to give a broad definition of the term 'modern slavery' and half said they have 'some' understanding of risks in our supply chain.

<p><b>Potential modern slavery risks</b></p>	<p><b>Cause:</b> Unlikely in Australia, potential risks in South Africa and our majority controlled joint venture in the Philippines</p> <p><b>Contribute:</b> Tight deadlines, seasonal peak periods, cost pressures, less direct visibility of overseas operations and suppliers</p> <p><b>Directly linked:</b> Direct suppliers in higher risk countries, less visibility of indirect suppliers and outsourcing arrangements</p>
<p><b>How we manage risk and practice due diligence</b></p>	<p><b>Governance framework:</b> Board engagement and oversight, risk management framework, action plan, code of conduct and policies</p> <p><b>Due diligence and risk management:</b> Supplier risk prioritisation, supplier reviews and attestation, research, stakeholder engagement and monitoring</p> <p><b>Training &amp; engagement:</b> Training, relationship building and Anti-Modern Slavery Working Group Consultation with teams in South Africa and PSI</p>

To establish a new baseline for our first year as a separate reporting entity under the Act, the working group undertook an analysis across five key aspects of PetSure's business, the results of the analysis have enabled us to:

- develop practical actions to address risks
- prioritise actions and set timeframes for deliverables
- assign responsibilities for implementation
- identify 'unknowns' and the need for additional research or engagement with customers and other stakeholders

\*Source: Anti-Slavery International

# Highlights of 2023

A priority for PetSure during its first reporting period as a separate reporting entity has been on reviewing existing systems and processes for managing operational and supply chain modern slavery risks, determining the highest risk and highest priority suppliers and building an anti-modern slavery risk management framework.

With support from expert advisers, direct (Tier 1) suppliers and supply categories were documented and prioritised against internationally recognised modern slavery risk indicators.

Members of our Anti-Modern Slavery Working Group participated in training in the key aspects of modern slavery risk and requirements of the Act. Once trained, the group participated in facilitated workshops, the purpose of which was to reset our baseline by:

- identifying gaps in systems and processes that may increase exposure to modern slavery risks
- identifying opportunities to improve and enhance the systems and processes, and
- informing the development of an anti-modern slavery program

## Resetting our baseline

### Anti-Modern Slavery Program

#### Gap analysis results

Baseline  Full Effective



#### Human resources

Awareness  
Policies and systems  
Training  
Labour hire



#### Management systems

Governance  
Business systems  
Action  
Monitoring / Reporting



#### Supply chain

Policy / procedures  
Contract management  
Screening / traceability  
Supplier engagement  
Monitoring / corrective action



#### Risk management

Risk framework  
Customer risk  
External risk  
Monitoring / reporting



#### Customers / stakeholders

Customer attitude  
Information provision  
Feedback mechanisms  
Worker voice



# Highlights of 2023

## Total Spend Analysed

Analysis of \$92.2 million of spend across our operations identified 18% of spend as potentially high risk for modern slavery, mostly due to corporate expenses and non-procurement (refer to Risk by Category for more information). 23% of spend is medium risk and 59% is considered lower risk.

This risk profile is typical for an office-based insurance industry service company headquartered in Australia.

## Risk by Suppliers

Analysis of 441 suppliers across three operating areas indicates 19% are potentially high risk for modern slavery. A further 31% of suppliers are considered a medium risk and 50% are a lower risk.

Whilst some of our direct suppliers based in Australia represent a lower risk (according to the country risk indices used), we also engage suppliers located in countries and working in industry sectors with a higher risk for modern slavery (for example, ICT hardware and building and construction services).

## Risk by Category

Based on the four risk factors (geography, industry sector, commodity and workforce profile), 16 of the 27 categories of goods and services (59%) we procure are potentially high risk for modern slavery i.e. corporate expenses and non-procurement spend, including intra-company service arrangements, such as those with the operations in the Philippines.

These two categories make up 95% of our potentially high risk spend. Other lower spend potentially high risk categories included building and construction (mostly due to our one-off spend on refurbishments in our South African office), travel, office catering, promotional products, corporate events, sponsorship of community groups and facility management services.

Increased levels of modern slavery risk associated with our higher risk and higher spend categories is due to supplier location (primarily the Philippines), and the industry sectors involved, including call centres, facility management services, ground transport, travel and catering services.

## Risk by Supplier Country

We purchased a wide range of goods and services from 12 countries during the period ending 30 June 2023.

According to the Global Slavery Index 2022 and SD Strategies Country Risk Index 2022, two of our supplier countries are at higher risk for modern slavery: the Philippines and South Africa. We used

44 suppliers located in the Philippines and 32 suppliers in South Africa.

We also have two suppliers located in a higher risk country Hong Kong (SAR - China). However, both are in the medium to low-risk categories of professional services and recruitment of professional staff and spend with these suppliers is less than one percent of our total spend.

While almost three-quarters (74%) of our suppliers are in Australia (refer to Figure 1: Global Supplier Map) we recognise that these are Tier 1 (direct) suppliers. We acknowledge that there may be risks associated with their suppliers (i.e. our Tier 2 suppliers) and other suppliers in our extended supply chain. We will work towards identifying and managing risk in our extended supply chain in future reporting years.

Using this analysis as input, and with assistance from expert advisors, the working group developed a comprehensive Anti-Modern Slavery Action Plan and high-level three-year roadmap to inform our ongoing risk management approach to modern slavery.

To integrate modern slavery risk management across our operations, we reviewed our risk assessment framework and included modern slavery as an identified business risk.

PetSure's Executive Leadership Team and Board is engaged in support of our anti-modern slavery actions and monitors our progress on an ongoing basis.

# Assessing our effectiveness

From 2023, qualitative and quantitative measures have been developed to track the implementation of the anti-modern slavery program.

Area of Focus	Activity	Qualitative Indicators	Quantitative Indicators
<b>Project Management and Continuous Improvement</b>	<ul style="list-style-type: none"> <li>Working Group engages key stakeholders</li> <li>Implementation and refinement of the Anti-Modern Slavery Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>Incorporation of modern slavery risk management into systems and processes</li> <li>Feedback (formal and informal) from stakeholders on impact of program</li> </ul>	<ul style="list-style-type: none"> <li>Percent of action plan completed within allocated time frame</li> </ul>
<b>Governance</b>	<ul style="list-style-type: none"> <li>Formalise anti-modern slavery policy</li> <li>Anti-Modern Slavery Statement published on Commonwealth Register and company website</li> </ul>	<ul style="list-style-type: none"> <li>Modern slavery included in relevant company policies and procedures</li> <li>Anti-Modern Slavery Statement approved and submitted on time</li> </ul>	<ul style="list-style-type: none"> <li>Percent policies reviewed and updated</li> </ul>
<b>Risk Management</b>	<ul style="list-style-type: none"> <li>Communicate and integrate modern slavery risk management into broader risk management processes</li> <li>Develop an understanding of existing modern slavery/ human rights risks and emerging threats within our business and industry sector</li> </ul>	<ul style="list-style-type: none"> <li>Integration into risk appetite statement</li> <li>Enhanced internal understanding and discussion of modern slavery risks and expectations to manage risk amongst internal and external stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Number of modern slavery and human rights risks identified and documented</li> <li>Number of risk mitigation actions implemented including the application of remedy to identified victims</li> </ul>
<b>Procurement, contracts and supplier management</b>	<ul style="list-style-type: none"> <li>Supplier risk assessments (focusing on potentially high risk suppliers) including mapping Tier 2 suppliers</li> <li>Screening for risk including during supplier prequalification and onboarding</li> <li>Risk management requirements incorporated into new supply agreements and contract renewals</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing engagement and education of suppliers</li> <li>Enhanced due diligence of high-risk suppliers including self-assessment questionnaires</li> <li>Issues and opportunities identified in supplier to self-assessment questionnaires responses (Tier 1)</li> </ul>	<ul style="list-style-type: none"> <li>Percent of suppliers engaged and trained</li> <li>Percent of supplier responses to self-assessment questionnaires</li> <li>Number of corrective actions identified</li> <li>Percent of supplier contracts with modern slavery clauses</li> </ul>
<b>Grievance and remedy</b>	<ul style="list-style-type: none"> <li>Reporting channels (whistleblower) reviewed, updated and communicated</li> </ul>	<ul style="list-style-type: none"> <li>Grievance mechanisms and reporting channels actively communicated to internal and external stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Total number of modern slavery issues raised via reporting channels</li> <li>Percent of issues addressed</li> </ul>
<b>Training and communications (Internal and external)</b>	<ul style="list-style-type: none"> <li>Board, senior leader and employee engagement and training</li> <li>Awareness raising and engagement of all stakeholders regarding modern slavery issues and opportunities</li> </ul>	<ul style="list-style-type: none"> <li>Enhanced organisational awareness and knowledge of modern slavery risks</li> <li>Board and senior leader engagement with the anti-modern slavery program</li> <li>Engagement of suppliers and other key stakeholders regarding risk management</li> </ul>	<ul style="list-style-type: none"> <li>Percent of Board, senior leaders and employees trained</li> <li>Percent of employees who understand what modern slavery means addressed via a survey</li> <li>Number (and percentage) of employees and relevant external supplier representatives undertaking training</li> </ul>

## Our future focus

In the year ahead, PetSure's focus is on implementation of our anti-modern slavery action plan. We will continue to raise awareness among key internal stakeholders including leaders, employees and contractors.

Accountabilities for anti-modern slavery actions will be further captured in Success Profiles (position descriptions) for relevant roles. We will also incorporate measures to manage modern slavery risk into our Outsourcing Policy and agreements with providers.

PetSure will survey its workforce to assess understanding of modern slavery, the outputs of which will be used in designing education and training initiatives.

Consideration will be given to establishing additional broad supplier audits focussing on higher-risk categories of goods and services and incorporating actions to engage and educate new suppliers as part of our supplier onboarding processes.

We will gain a better understanding of Tier 2 suppliers to our Australian and overseas operations, focus on lower spend high risk categories, and take steps to identify risks across our extended supply chain.

Beyond FY24 we will review, evaluate and strengthen our anti-modern slavery program and extend our efforts to managing broader human rights risks. We will establish performance standards and evaluation criteria for suppliers and develop corrective actions with identified higher-risk suppliers.

We will review opportunities for any at-risk workers in our operations and supply chain to communicate with us through a formal pathway to support victims, aligning with the [UN Guiding Principles on Business and Human Rights](#) and [International Labor Organisation \(ILO\)](#) best practice principles.



# Our future focus

Area of Focus	Year 1 (2023) Establish Framework	Year 2 (2024) Expand Due Diligence Program	Year 3 (2025+) Review, Extend, Evaluate & Improve
<b>Project management and continuous improvement</b>	<ul style="list-style-type: none"> <li>Formalised Anti-Modern Slavery Working Group</li> <li>Developed a detailed three-year Modern Slavery Action Plan and Roadmap</li> </ul>	<ul style="list-style-type: none"> <li>Demonstrate continuous improvement for anti-modern slavery due diligence</li> </ul>	<ul style="list-style-type: none"> <li>Identify opportunities for innovation and collaborate with relevant industry stakeholders</li> </ul>
<b>Governance</b>	<ul style="list-style-type: none"> <li>Documented modern slavery management obligations and existing internal systems and process controls</li> <li>Developed an employee survey to establish a baseline for future monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Adopt ant-modern slavery policy</li> <li>Continue to integrate modern slavery into internal governance frameworks</li> <li>Review accountabilities in functions with responsibilities for procurement and supplier management</li> </ul>	<ul style="list-style-type: none"> <li>Review outcomes and effectiveness of actions and update the anti-modern slavery action plan</li> <li>Continue to strive for improvements in how we manage and mitigate modern slavery risks</li> </ul>
<b>Risk Management</b>	<ul style="list-style-type: none"> <li>Identified opportunities to incorporate modern slavery into the Risk Management Strategy and Framework</li> </ul>	<ul style="list-style-type: none"> <li>Review and update key governance documentation such as Risk Management Strategy and Framework, Compliance Framework</li> <li>Integrate modern slavery into risk management strategies, systems and processes</li> <li>Assess and address potential modern slavery risks within overseas operations</li> </ul>	<ul style="list-style-type: none"> <li>Review and report on the integration of anti-modern slavery actions into our operational systems and processes</li> </ul>
<b>Procurement, Contracts and Supplier Management</b>	<ul style="list-style-type: none"> <li>Mapped Tier 1 (direct) suppliers</li> <li>Undertook a supplier risk prioritisation process to identify risk categories and potentially high-risk suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Undertake additional due diligence of high risk suppliers</li> <li>Identify opportunities to incorporate anti-modern slavery risk management into procurement processes including onboarding and annual attestation</li> <li>Include anti-modern slavery requirements in key high risk contracts</li> <li>Begin to map and assess risk in Tier 2 suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Review the effectiveness of modern slavery risk management actions in procurement systems and requirements in supplier contracts</li> </ul>
<b>Grievance and remedy</b>	<ul style="list-style-type: none"> <li>Reviewed internal and external reporting channels</li> </ul>	<ul style="list-style-type: none"> <li>Incorporate anti-modern slavery reporting in whistleblower and other grievance mechanisms</li> </ul>	<ul style="list-style-type: none"> <li>Align a transparent and accountable anti-modern slavery remediation program with the UNGPs</li> </ul>
<b>Training and Awareness</b>	<ul style="list-style-type: none"> <li>Trained the Anti-Modern Slavery Working Group on modern slavery risks and legislative reporting requirements</li> </ul>	<ul style="list-style-type: none"> <li>Align Board and senior leaders on additional requirements and implications for business pending outcomes of the legislative review</li> <li>Develop an internal anti-modern slavery awareness program</li> </ul>	<ul style="list-style-type: none"> <li>Undertake anti-modern slavery training needs analysis for internal and external stakeholders</li> </ul>



This Statement is made in accordance with the requirements of the Act and constitutes PetSure's Anti-Modern Slavery Statement for the year ending 30 June 2023. This Anti-Modern Slavery Statement was approved by the PetSure Board.

Signed for and behalf of the Board.

Chair of the PetSure Board  
December 2023