



VetPartners



Modern Slavery Statement



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Introduction

At VetPartners, we believe everyone has the right to a life free from exploitation, forced labour, child labour and servitude. We oppose slavery with a zero tolerance for slavery in all its forms.

VetPartners is committed to improving our practices to combat slavery, ensuring that our suppliers reflect our commitment to upholding human rights through their modern slavery risk frameworks, policies and procedures.

This is our second modern slavery statement and has been prepared in accordance with the requirements under the *Modern Slavery Act 2018 (Cth)* (the “**Act**”). It sets out the actions we have taken to assess and address the potential modern slavery risks in our operations and our supply chains in line with our broader risk management framework in the second reporting period.

We have adopted a risk-based approach based on the size and nature of our operations and supply chains, to continually identify key activities aimed at progressively maturing and strengthening our framework of systems, controls and remediation in specific areas of the Group.

Our organisation

This is a joint modern slavery statement covering:

- Australian Veterinary Owners League Pty Ltd (AVOL); and
- Its subsidiaries that are required to report under the Act, as detailed in Annexure A. (“Reporting Entities”)

(together, the “Group” or “VetPartners”)¹.

Our structure

The AVOL Board of Directors (“**Board**”) is responsible for overseeing the performance and operations of the Group. The Board maintains oversight, through the Risk Committee, of how the business is managing modern slavery risks.

The Risk Committee is responsible for the Group’s risk management framework and continuous improvement and monitoring of risk and compliance throughout the Group.

The VetPartners Executive Leadership Team (**ELT**) has responsibility for supervising and implementing actions to address modern slavery risks.

Our business

VetPartners provides veterinary services and ancillary services in Australia. We also operate a training centre and managed services business for the veterinary sector.

VetPartners was established in 2016 and started as a community of 32 veterinary practices across three states in Australia.

VetPartners has grown at a rapid pace and today, is a community of over 4,500 people, 250 veterinary practices across Australia, New Zealand and Singapore and a number of other related service businesses.

VetPartners supports its businesses with support offices in Australia and New Zealand. The support offices provide a range of functions such as payroll, finance, IT, legal, risk and compliance, insurance management, procurement and sourcing, human resources, learning and development, recruitment and marketing.

1. In 2021, the Group changed its financial year end to 31 December, and to enable that to occur, adopted an 18-month transitional period commencing on 1 July 2020 and ending on 31 December 2021. Accordingly, this modern slavery statement covers the reporting period 1 July 2020 to 31 December 2021.



Our operations and supply chains

In the prior reporting period, VetPartners undertook a risk assessment on the procurement supply chain associated with our veterinary practices and other related services business, as a key risk area for modern slavery in our business.

We identified, as a key risk area for modern slavery, five main Australian based companies that collectively accounted for 95% of the Group's spend in relation to animal medications, parasiticides, nutrition, vaccines and pathology. Two of these suppliers were product manufacturers and the other three were wholesalers.

In this reporting period, we ensured that each of the five key suppliers:

- Completed a modern slavery questionnaire and provided additional information to facilitate us undertaking a risk assessment on the individual supplier.
- Understood our expectation that they each have their own modern slavery policies and procedures in place, and that their employees and contractors have an acute awareness of modern slavery risks and the obligations of applicable laws in relation to reducing those risks.
- Where agreements were due for renewal in the reporting period for those suppliers, we requested that the supplier accept provisions that bind the supplier to practices that conform to our modern slavery policy and to notify us of any actual or suspected breach of modern slavery laws, for review and remediation if required.

In this reporting period, we also have expanded our mapping of operations and supply chains in other areas of our business which may have potential modern slavery risks. We have conducted a preliminary mapping of the following:

Operations	Supply chains
Veterinary practices and other related services businesses	Procurement of pharmaceuticals, clinical consumables, nutrition products, and pet retail products.
Support office	Procurement of professional services, office supplies, cleaning, IT hardware and software.
Property	Procurement of cleaning, fire safety services, general maintenance and construction services.



The potential risks in our operations and supply chains

In this reporting period, there have not been any reports of actual or suspected modern slavery brought to our attention arising from our business operations or supply chains.

We recognise that there are inherent risks of modern slavery occurring within the products and services which we procure due to a combination of industry, geography and product/service type.

Those risks remain live in relation to the 5 key suppliers previously reviewed.

We have undertaken a preliminary risk assessment on our other key supply chains and business operations according to our broader risk management framework and identified the following potential risks:

Business Risk Area	Supply chains	Potential Risks identified
Veterinary practices and other related services businesses	Procurement of pharmaceuticals, clinical consumables, nutrition products, and pet retail products.	<ul style="list-style-type: none"> • Employment or engagement of migrant workers or base-skilled workers. • High risk geographic locations for manufacturing of veterinary consumables. • Third party labour arrangements. • Labour risks associated with sourcing raw materials.
Support office	Procurement of professional services, office supplies, cleaning, IT hardware and software.	<ul style="list-style-type: none"> • Employment or engagement of migrant workers or base-skilled workers. • High risk industries (cleaning, product and service category, shipping and transport providers). • Third party labour arrangements. • High risk geographic locations for sourcing particular products.
Property	Procurement of cleaning, fire safety services, general maintenance and construction services.	<ul style="list-style-type: none"> • High risk industry for migrant labour exploitation. • High demand for base-skilled labour force. • Poor visibility over long and complex supply chains. • Low-tier suppliers operating in high-risk geographies. • Tight project deadlines and seasonality.

Addressing potential risks in our operations and supply chains

We remain committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our plan reflects our continuing commitment to developing and enhancing our capability to systematically identify and respond to modern slavery risks in our operations and supply chains.

Our Modern Slavery Policy and related practices reflect our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not permitted anywhere in our business and supply chains.



Our policies and procedures continually aim to:

- Identify and assess potential risk areas.
- Mitigate the risk of slavery occurring.
- Monitor potential risk areas.
- Protect Whistleblowers from victimisation and discrimination

If we identify suppliers that perpetrate or are at high risk of perpetrating modern slavery offences, we will do any or all of the following:

- Work with the supplier to implement a remediation plan.
- Increase auditing and monitoring of the supplier's activities.
- Reduce supplier spend.
- Suspend or terminate the supplier's engagement.

We continually aim to reduce modern slavery in our business practices through:

1. Clear reporting responsibilities

The Risk Committee was established in the last reporting period. The Risk Committee is responsible for the Group's risk management framework and continuous improvement and monitoring of risk and compliance throughout the Group. The Risk Committee meets every 2 months. The Risk Committee sets the Group's risk appetite for modern slavery risks and monitors the Group's risk profile through the Risk Register. The VetPartners Executive Leadership Team (ELT) has responsibility for supervising and implementing actions to address modern slavery risks.

2. Due diligence

In the last reporting period, we implemented a supplier due diligence program which requires existing and new suppliers which are above an identified category of monetary spend to complete a questionnaire and provide copies of their policies and procedures relating to modern slavery. This has enabled us to be clear in our expectation of our suppliers eliminating modern slavery in the supply chain and help us to identify any suppliers that do not meet this expectation. In this reporting period, we intend to continue and expand on this process, ensuring that all suppliers in the identified categories have complied with our requirements.

3. Training

To train and continue to build awareness and capability, we will provide targeted training to key team members in procurement roles or undertaking purchasing activities in the business so that our people understand and can act on the risks of modern slavery in our supply chains and business operations. We also expect our suppliers to have trained and built the same level of awareness amongst their employees and in their supply chain.

4. Contracts

We have revised our modern slavery contractual provisions and will continue leveraging compliance and safeguarding by ensuring contracts with suppliers in the identified categories:

- Require suppliers to adhere to our due diligence program.
- Require suppliers to have their own Modern Slavery Policy, training, due diligence program and annual auditing.
- Require suppliers to report any actual or suspected modern slavery in their business or supply chains.
- Allow ongoing monitoring and auditing of suppliers.
- Allow us to terminate or suspend the contract if modern slavery risks are identified.

5. Protection of Whistleblowers

We continue to provide grievance mechanisms for our community to identify and escalate modern slavery concerns, including autonomously through an external provider under our Whistleblower Policy and Whistleblower Protected Disclosure Procedure.



Assessing the effectiveness of our actions

We recognise the importance of evaluating the effectiveness of actions taken to combat modern slavery during each reporting period.

We remain committed to continual review and improvement on our risk management framework.

Modern slavery risks will continue to be monitored and reported on through the Risk Committee.

We will continue our program of training and awareness building, and continual updating of supplier contracts to ensure that modern slavery risks are identified and reduced.

In the next reporting period, we intend to prioritise the development and implementation of an audit program which measures the effectiveness of our modern slavery risk control framework and identifies any areas for improvement.

Further steps and priorities

- Review and update, if necessary, our Modern Slavery Policy and due diligence procedures. Train and refresh our team members' understanding and awareness of modern slavery risks and expectations of risk assessment in key risk areas, including procurement and property.
- Develop and implement an audit program for assessing the effectiveness of our modern slavery risk management framework.
- Map out our operations and supply chains encompassing other areas within the business and conduct a risk assessment in those areas to identify potential touch points for modern slavery risks.
- Expand our supplier due diligence program to other operational areas within the business where there may be potential modern slavery risks.
- Continue to communicate our expectations to suppliers, through our due diligence procedures and contractual provisions mandating modern slavery compliance.
- Continue to articulate clear grievance and remediation mechanisms through our policies and procedures, including promoting our Modern Slavery Policy, Whistleblower Policy and Protected Disclosure Procedure to our team members, contractors, and suppliers.

Consultation and approval process

This joint modern slavery statement has been prepared by Australian Veterinary Owners League Pty Ltd in consultation with the Reporting Entities. This joint statement was approved by the Board on 30 June 2022.

Mark Jeffery

Director, Australian Veterinary Owners League Pty Ltd



Annexure A

Reporting Entities

Australian Companies	ACN
AAH Finance Pty Ltd	603 185 664
AAH Group Pty Ltd	603 162 750
Adelaide Animal Hospitals Pty Ltd	056 094 029
Albion Vet Surgery Pty Ltd	604 357 575
Alpha Holdings Pty Ltd	009 222 217
AMS Alexandria Pty Ltd	159 296 750
Anne M. Dynon Pty Ltd	007 229 129
Aussie Paws Operations Pty Ltd	602 977 631
Australian Animal Hospitals Pty Ltd	163 674 593
Australian Veterinary Owner's League Pty Ltd	601 874 588
Balwyn Veterinary Surgery Pty Ltd	007 005 414
Brisbane Veterinary Specialist Centre Pty Ltd	649 265 421
Brunswick Central Operations Pty Ltd	606 046 164
Caring Vets Pty Ltd	147 445 154
Cremorne Veterinary Hospital Pty Ltd	164 736 127
Debritz Holdings Pty Ltd	060 040 155
Eastside Veterinary Emergency and Specialists Pty Ltd (formerly Eastside Veterinary Emergency Pty Ltd and Eastside Vets Specialist Consulting and Procedure Centre Pty Ltd)	152 072 467
FAH Veterinary Pty Ltd	158 292 810
Figtree Veterinary Hospital Pty Ltd	128 187 093
Fitzroy Operations Pty Ltd	606 046 173
Greenfields Veterinary Hospital Pty Ltd	099 276 758
Herriot House Pty Ltd	054 914 162
Kest Pty Ltd	100 687 983
Kogarah Veterinary Centre Pty Ltd	109 710 849
Manracco Pty Ltd	000 859 254
ML & L Pty Ltd	151 647 906
My Pet Hub Balaclava Pty Ltd	645 431 625
My Pet Hub Redlynch and Brinsmead Pty Ltd	645 499 949
National Veterinary Care Pty Limited	166 200 059
Noice Investments Pty Ltd	062 122 507
Northern Suburbs Veterinary Hospitals Pty Ltd	005 021 456
North Shore Veterinary Holdings Pty Ltd	134 502 382
North Shore Veterinary Hospitals Pty Ltd (formerly Lincoln Bide Pty Ltd)	125 697 387
NVA Australia Holdings Pty Ltd	609 625 710



Australian Companies	ACN
NVA Australia Parent Pty Ltd	609 622 460
NVC Operations NSW Pty Ltd	605 428 804
NVC Operations Pty Ltd	605 403 923
Ourimbah Veterinary Hospital Pty Ltd (formerly C H Rayson Pty Ltd and Syturn Pty Ltd)	001 969 286
Parramatta Veterinary Surgical Specialists Pty Ltd	116 436 170
Patfast Pty Ltd	003 657 010
Pet General Aberfoyle Pty Ltd	610 200 792
Pet General Burpengary Pty Ltd	610 200 809
Pet General Clayfield Pty Ltd	611 895 633
Pet General Corio and Lara Pty Ltd	610 200 818
Pet General East Bentleigh Pty Ltd (formerly Bentleigh Vet Clinic Pty Ltd)	617 718 608
Pet General Ferntree Gully Pty Ltd	613 436 543
Pet General Forest Hill Pty Ltd	610 923 236
Pet General Grafton Pty Ltd	611 922 402
Pet General Indooroopilly Pty Ltd	610 200 827
Pet General Lakehaven Pty Ltd	613 363 965
Pet General Lincoln Pty Ltd	610 200 836
Pet General Pty Ltd	109 952 650
Pet General Quakers Hill Pty Ltd	614 728 175
Pet General Salisbury Pty Ltd	616 176 008
Pet General V4P Pty Ltd	610 243 037
Pet General Vineyard Pty Ltd	613 220 429
Petcorp Bankstown Pty Ltd	125 794 194
Petcorp Bexley Pty Ltd	115 485 151
Petcorp Epping Pty Ltd	128 084 355
Petcorp Guildford Pty Ltd	161 009 098
Petcorp Parramatta Pty Ltd	125 678 355
Petcorp Ryde Pty Ltd	142 207 994
Petcorp Waverley Pty Ltd	604 425 121
Robin G. Stanley Pty Ltd	058 250 098
SheppVets Pty Ltd	005 042 884
Southpaws Vet Mornington Pty Ltd	639 420 116
Southpaws Vet Pty Ltd	109 528 341
Southpaws Vet Specialists Mornington Pty Ltd	639 260 067
Sunbury All Creatures Pty Ltd	121 056 077
Townsville Operations Pty Ltd	633 240 936
Tredream Pty Ltd	606 980 401
Universal Vet Services Pty Ltd	647 627 147
UVG (Aust) Pty Ltd	169 353 342
UVG (IP) Pty Ltd	169 352 265
UVG (USA) Pty Ltd	164 701 277



Australian Companies	ACN
UVG Holdings Pty Ltd	169 348 798
V4P Pty Ltd	610 187 525
Vet Centre Montrose Pty Ltd	619 714 108
Vet Ventures Pty Ltd	620 258 960
Veterinary Happiness Redland Bay Surgery Pty Ltd	098 804 258
Veterinary Surgical Associates Pty Ltd	095 259 779
VetPartners ACT Pty Ltd	622 815 641
Vetpartners Adelaide Plains Veterinary Surgery Pty Ltd	646 573 631
Vetpartners Albany Creek Veterinary Surgery Pty Ltd	659 312 893
Vetpartners Aus Pty Ltd (formerly Petcorp Chatswood Pty Ltd, Petcorp Pty Ltd & Vets 'n Pets Pty Ltd)	110 059 599
Vetpartners Australia Pty Ltd (formerly Petcorp Pty Ltd)	114 962 453
Vetpartners Belconnen Animal Hospital Pty Ltd	650 366 957
VetPartners Canberra Equine Hospital Pty Ltd	622 879 903
VetPartners Castle Hill Pty Ltd	625 297 556
VetPartners Fawkner Veterinary Hospital Pty Ltd	641 635 896
Vetpartners Gables Veterinary Group Pty Ltd	652 472 501
Vetpartners Hawthorn Group Vet Clinics Pty Ltd	651 845 126
Vetpartners North Shore Veterinary Emergency and Specialists Pty Ltd	652 122 131
VetPartners NSW Pty Ltd	619 455 346
VetPartners NVC Pty Ltd	638 517 389
VetPartners Operations WA Pty Ltd	616 463 560
Vetpartners Peninsula Vet Pty Ltd	650 146 320
Vetpartners Perth Animal Eye Hospital Pty Ltd	651 200 743
VetPartners Perth Veterinary Specialists Pty Ltd	641 122 634
Vetpartners QLD Pty Ltd	616 534 939
VetPartners Rossmore Pty Ltd	638 023 980
Vetpartners SA Pty Ltd	624 130 650
VetPartners South Eastern Animal Hospital Pty Ltd. (previously Scot Plummer Pty Ltd)	079 555 427
Vetpartners Southern Animal Health Pty Ltd	657 435 991
Vetpartners Supervets Pty Ltd	649 415 421
VetPartners VIC Pty Ltd	616 845 517
VetPartners WA Pty Ltd	615 695 719
Vetpartners Whitehorse Veterinary Hospital Pty Ltd	649 587 539
VetWest Pty Ltd	009 452 233
VetWest WA Pty Ltd	604 012 839
Wambivet Pty Ltd	140 554 801
Whitehorse Veterinary Hospital	147 538 225
Wysch Pty Ltd	119 499 491