

# Modern Slavery Statement

FY 2024



# 2024 Petstock Group Modern Slavery Statement

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

Petstock Group has prepared this Modern Slavery statement (**Statement**) in accordance with the Modern Slavery Act 2018 (Cth) (**the Act**). This statement outlines the steps taken by the group to identify, assess and address potential modern slavery risks in our operations and supply chain during the report period ending 30 June 2024 (FY24, the **Reporting Period**).

The Petstock Group is made up of Petstock Pty Ltd and all other entities over which Petstock Pty Ltd has control of for accounting purposes, including its controlled entities, businesses, related brands and digital services. In Q3 of FY24, Woolworths Group acquired a 55% stake in Petstock Group Ltd. The Petstock Group will continue to run as a standalone business in partnership with the Woolworths Group. Due to the timing of this acquisition, Petstock Group will submit our own Modern Slavery Statement for this Reporting Period.

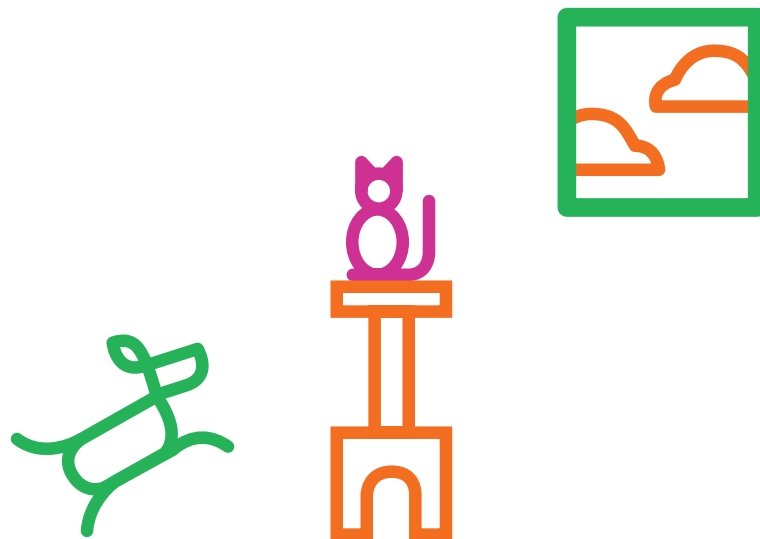
## Preparation of This Statement

The development of this statement was led by our Sustainability Team, with input from the Modern Slavery Steering Committee (**Steering Committee or MSSC**) and Working Group (WG). This committee is made up of members of our executive leadership team. This Statement was approved by the Board of Petstock Pty Ltd on [17th December 2024](#).

## Mandatory Reporting Criteria

The Act sets out seven mandatory criteria for the content of the Statement. This Statement addresses the mandatory reporting criteria of the Act. The table below identifies where each criterion of the Act is disclosed within the sections of the Statement.

Modern Slavery Act Requirement	Page Reference in this statement
Identification of the Reporting Entity	1
Description of our structure, operations and supply chains	5-9
Description of the risks of modern slavery practices in our operations and supply chains and in any entities, we own or control	10-13
Description of the actions we have taken to assess and address these risks (including due diligence and remediation processes)	14-19
How we assess the effectiveness of our actions	20-21
Description of the process of consultations with any entities the reporting entity owns or controls	2



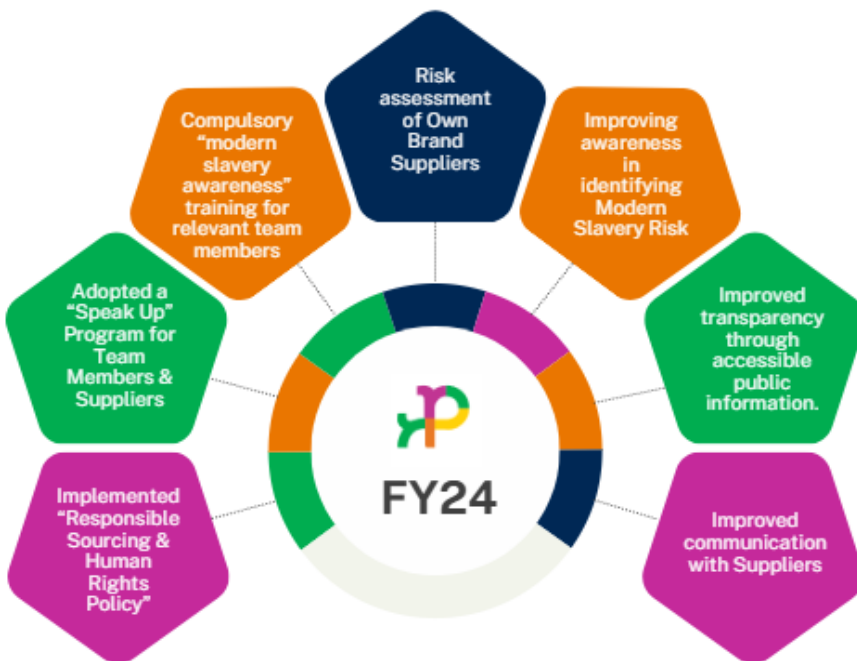
<sup>1</sup> This Modern Slavery Statement is made by the Petstock Group on behalf of each of the entities set out in Appendix 1 and together the Petstock Group Reporting Entities, we, us and/or our<sup>1</sup>. Petstock Pty Ltd (ACN 098 394 588) is the ultimate holding company of the Petstock Group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

## Consultation

During this reporting period and in preparing this statement we actively engaged and consulted with our controlled entities (outlined in Appendix One). The Modern Slavery Working Group (WG) led the development of this statement, with contributions from stakeholders across Petstock Group, including members of the Modern Slavery Steering Committee (MSSC) and Woolworths Human Rights Team. The MSSC include executive leadership team members who oversee key departments and were actively consulted in relation to the development of this statement and throughout the reporting period to inform and contribute. Additionally, team members from Own Brand Team, Merchandise Team, and Operations Team were involved in the development and review of this statement and contributed to meeting the objectives of our framework throughout the reporting period.

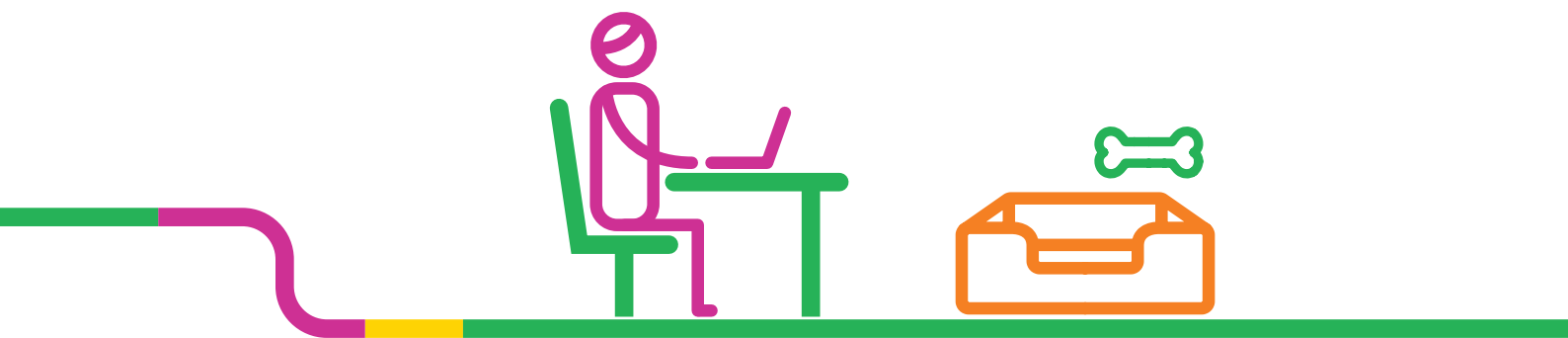
Board of Petstock Pty Ltd also reviewed and provided feedback on this statement before final approval.

## Key Priority Highlights for FY24



## Snapshot of Our Progress

<p><b>Improving Transparency</b>  <a href="https://petstockgroup.com.au/page/sustainability">petstockgroup.com.au/page/sustainability</a></p>	<p>In 2024, we incorporated the United Nations Guiding Principles on Business and Human Rights into a new Responsible Sourcing and Human Rights Policy, establishing a clear framework and due diligence process for identifying and addressing these risks.</p>
<p><b>Embedding modern slavery considerations into our operational and supply chains</b></p>	<ul style="list-style-type: none"> <li>• Launched the “Speak Up” Grievance reporting platform and policies.</li> <li>• Established a Supplier Code of Conduct featuring specific clauses on Modern Slavery.</li> <li>• Adopted new supplier onboarding packs that include policies and documentation outlining our commitment to addressing Modern Slavery.</li> <li>• Conduct a review of our Manufacturing Agreements to ensure compliance with modern slavery regulations and responsible sourcing standards.</li> </ul>
<p><b>Undertaking detailed risk assessments across our supply chain and operations</b></p>	<ul style="list-style-type: none"> <li>• Implemented supplier risk assessments for our own brand food suppliers.</li> <li>• Conducted a review to identify risks within our internal operations, focusing on departmental risk.</li> <li>• Conducted a review to identify risks linked with our direct and indirect suppliers.</li> </ul>
<p><b>Building awareness among our team members and suppliers</b></p>	<ul style="list-style-type: none"> <li>• Delivered Modern Slavery Awareness Training to Petstock Group team members, the Executive Team, and Board members.</li> <li>• Conducted risk information sessions with relevant teams.</li> <li>• Provided regular updates to the executive leadership team on Modern Slavery legislative developments.</li> </ul>



## Key Priorities for FY25

For the upcoming period, our focus area for modern slavery risk management will be to prioritise actions across the following key performance indicators.

<b>Reporting Modern Slavery Cases</b>	Actively monitor and report any relevant cases of modern slavery risk.
<b>Training Completion Rates</b>	Improve team member awareness of modern slavery issues by increasing completion rates.
<b>Grievance Program Interactions</b>	Report the number of interactions through Speak Up Program.
<b>Governance Effectiveness</b>	Actively monitor the number of agreements signed by suppliers to drive continuous improvement.
<b>MSCC Engagement</b>	Actively monitor MSCC attendance rates to ensure leadership engagement and improvements.
<b>Risk Segmentation &amp; Prioritisation</b>	Conduct ongoing assessment of 'own brand' suppliers to identify and monitor key risk areas.
<b>Monitoring &amp; Reporting</b>	Enhance public and supplier transparency by improving reporting practices.

# Our Structure, Operations and Supply Chains

## About Us

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

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

In FY24, Woolworths Group acquired a 55% stake in Petstock. During this reporting period, the structure and entities of Petstock Group remained unchanged.

## Our Operations

Our Petstock Group operations include bricks and mortar retail stores and online digital shopping platforms across all Australian states and territories and New Zealand. At the heart of everything we do is our vision, Together we make an impact for pets, their people and the planet.

As of 30 June 2024, the Petstock Group network included:

We directly employ over 4,700 team members in Australia and New Zealand in our retail stores, distribution centres, logistics and support offices. Our team members operate under contracts that adhere to the Australian and New Zealand employment laws. Additionally, we have indirect workers, services contractors and sub-contractors who provide support services to meet the needs of our businesses. This includes labour hire workers, who support activities such as the picking and packing of products and services such as pest control and window cleaning.

Our operations are supported by team members working in our support offices and distribution centres and we embed group wide policies, team member training and provide access to grievance mechanisms to mitigate the risks of modern slavery in our operations.

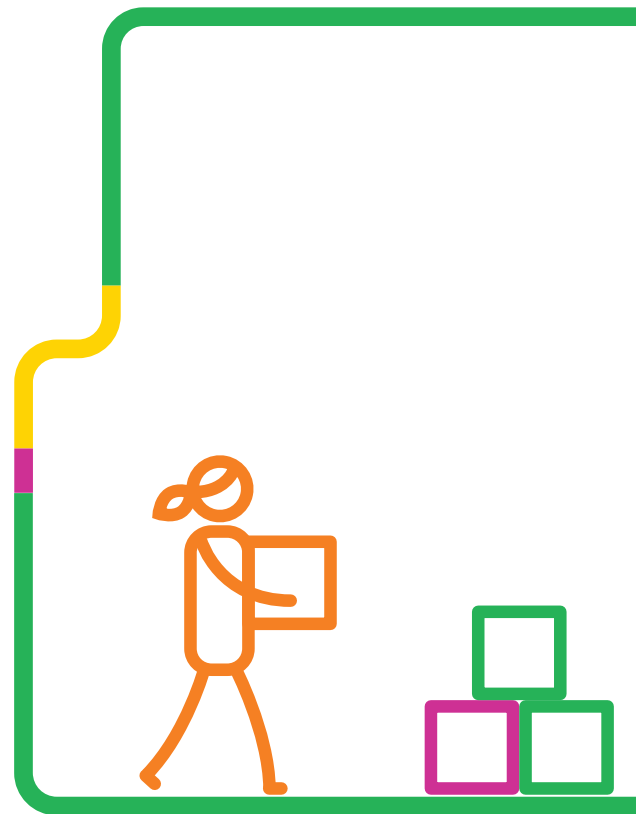
Structure	Operations and Supply Chains
<p><b>Retail Stores</b></p> <ul style="list-style-type: none"> <li>• Petstock</li> <li>• Petstock Country</li> <li>• Best Friends</li> <li>• My Pet Warehouse</li> <li>• Pet City</li> <li>• Private Label products</li> </ul>	<p>Our retail stores provide pet products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

## Our Supply Chain

As retailers, the Petstock Group procure a diverse array of products and services from 3800+ trade and non-trade suppliers. Our direct supply chain is diverse, geographically complex and ranges from small family-run businesses through to multinational companies. Our supply chain encompasses facilities responsible for converting raw material into finished products, sale of products, distribution and logistics networks involving multiple trade partners and suppliers across various stages.

We also collaborate with indirect suppliers who support our supply chain by providing goods or services to our direct suppliers. These indirect suppliers can operate at various levels including tier two (supplying to our direct suppliers), tier three (supplying to tier two suppliers), or suppliers even further down the supply chain.

Like many retailers, achieving full transparency with indirect suppliers at the lower levels of the supply chain is a challenge. We are committed to improving supply chain visibility where there are inherently higher risks of modern slavery, so we are in a better position to identify and, where needed, remediate risks to people.



### Examples of suppliers across Petstock’s supply chain

Tier 1	Tier 2
<p><b>Direct Trade Supplier Partners</b> <b>+740</b></p> <p><i>Includes suppliers of our 'own brands' products and 'vendor brands'.</i></p>	<p><b>Non-trade Suppliers Partners</b> <b>+3000</b></p> <p><i>Includes suppliers that provide a service or product but not involved in the goods sold to customers.</i></p>
<p>Direct trade suppliers provide us with products or manufacture products or services, purchased within our business. E.g.,</p> <ul style="list-style-type: none"> <li>• Petfood manufacturers</li> <li>• Pharmaceutical manufacturers</li> <li>• Pet accessories and bulky goods manufacturers</li> <li>• Vet healthcare products</li> <li>• Livestock (fish, reptiles, small animal etc)</li> </ul>	<p>Non-trade suppliers provide us with goods and services to support our stores, support offices, distribution centre and logistical requirements. E.g.</p> <ul style="list-style-type: none"> <li>• IT service providers</li> <li>• Facility maintenance (cleaning, security)</li> <li>• Labour hire</li> <li>• Third party logistics</li> <li>• Uniforms</li> <li>• Marketing &amp; advertising (signage &amp; fixtures)</li> <li>• Solar suppliers who provide fully assembled solar panels</li> </ul>
Tier 1	Tier 2
<p>Provide goods, services or raw materials to Tier 1 suppliers. E.g., provide grains for petfood manufactures or fabric for a company producing pet beds.</p>	<p>Provide goods, services or raw materials to Tier 1 suppliers. E.g., the firm that develops components used by our IT service providers or companies that supply silicon or glass used in the construction of solar panels.</p>



## Direct Trade Supply Partners

We procure and trade products that cover various categories including pet food, pharmaceutical products, vet healthcare, accessories, toys, kennels and fish tanks, live pets such as fish, birds, reptiles, and homewares such as pet bowls through to essential hobby farm items such as chicken wire and fencing.

Suppliers who produce products specifically for our brands (Glow, Billie's Bowl, Tilly) are referred to as 'own brand' suppliers. Some suppliers offer both vendor brand and own brand products. 'Vendor brand' suppliers are those who provide branded products that are sold in our retail and online stores under their own brand's name.

## Own Brand Sourcing

The Petstock Group Own Brand Sourcing Team is responsible for procuring a range of pet foods, including treats and pet accessories. We proactively collaborate with Own Brand suppliers to trace the origin of raw materials, such as seafood and leather, segmenting ingredient sources to better understand their origins. This effort includes evaluating sector-specific and supply chain risks, enabling us to identify potential vulnerabilities and promote more responsible sourcing practices throughout our supply chain. Our approach underscores transparency and ongoing engagement with suppliers to identify risks and apply responsible sourcing standards.

Our product range across our Own Brand brands includes pet food, toys, bedding, bowls, crates, apparel, collars and leads, treats, feeders and drinkers, scratchers and kennels and equine care. For own brand food products ~80% of food manufacturing locations are in Australia, with accessories including toys and apparel sourced mainly from China (~87.5%), India (~11.5%) and Vietnam (~1%).

## Vendor Brand Sourcing

Similar to our Own Brand Sourcing Teams, our vendor brand sourcing team has also focused on expanding its understanding of supply chains and operations. Our vendor product range is diverse, spanning pet food and treats, pet accessories, electronics, apparel, aquatic products, and pet health items. These products are sourced from a wide array of regions across the globe, including Australia, New Zealand, China, Europe, and South America.

## Non-Trade Supply Partners

To support our operations, we source a variety of products and services from non-trade suppliers, including items such as uniforms, store fixtures, and signage, as well as services like third-party logistics and cleaning. Recognising that our non-trade supply chain carries a higher inherent risk, we have made it a priority to conduct further due diligence in areas where vulnerabilities are more likely to exist.

We recognise that some non-trade categories have an inherently higher risk for modern slavery, including categories such as apparel (uniforms), which may involve complex global supply chains and manufacturing processes, and solar equipment, which can be linked to region-specific risks associated with raw material extraction and production.

# Risks of Modern Slavery Practices

Our diverse operations and supply chains increase our exposure to modern slavery risk across different regions and tiers. This complexity can obscure visibility into where and how product, materials or labour is sourced, increasing the likelihood of exploitation or forced labour.

In the previous reporting year, we identified that practices such as sourcing products or engaging with third party labour services have the potential for lack of oversight or geographical risk and should be addressed to help manage the extent of the risks of modern slavery that exist within our supply chains and operations.

To address this, we have undertaken due diligence activities year on year and established annual key performance indicators (KPIs) to guide and action these processes, with a focus on understanding risks in the following areas:

- **Debt bondage:** Excessive recruitment fees, retention of identity documents.
- **Deceptive recruitment:** Workers misled about job conditions, benefits, or roles.
- **Forced labour:** Restrictions on movement, threats, or intimidation, including state-enforced labour.
- **Trafficking in persons:** Exploitation through recruitment, transportation, or harbouring for forced labour.
- **Worst forms of child labour:** Children engaged in slavery-like practices or hazardous work.

While we assess the risks of slavery, servitude, and forced marriage to be lower in our value chain, continuous monitoring remains a priority.

## Risk in Our Own Operations

### Direct Labor

We employ over 4,700 team members across 270+ retail stores, 55+ vet clinics, 5 doggy daycare centres, 3 catteries, 3 support offices, and 3 distribution centres. The majority of these team members are directly employed, giving us visibility over employment terms and conditions, which are regulated by Australian and New Zealand employment laws.

We consider the risk of modern slavery within our directly employed team to be low, supported by robust legal frameworks such as the Occupational Health and Safety Act 2004 and the Fair Work Act 2009. Key controls include strong policies, continuous monitoring, team member training, and accessible grievance mechanisms.

### Indirect Labor

While the risk of modern slavery within our direct workforce is considered low due to our oversight of employment terms and conditions, the use of indirect labour presents a higher risk. This includes labour hire workers at our NDCs, where we have less direct oversight. Addressing these risks remains a key focus as we enhance our governance and monitoring systems.

In FY2024, we continued to engage indirect workers, such as labour hire personnel for NDCs and agency staff supporting vet clinics. These roles are filled through labour agencies, which pose a higher risk of modern slavery due to reduced oversight. Addressing this risk remains a key focus.

## Risks in Our Supply Chain

### Risks identified in Own Brand Sourcing

#### Product Risk

The inherently high risk product categories include.

- Food:
  - Pet food including meat and seafood fresh, frozen and dried
  - Pet treats
- Non-Food:
  - Apparel and textiles such as rugs, bedding, pet apparel
  - Pet toys
  - Leather products including collars and saddlery

#### Geographic Risk

The following countries have been identified as medium to high risk based on initial assessment results for both food and non-food.

- India
- Thailand
- China
- Vietnam

#### Sector Risk

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

- Food:
  - Seafood
  - Livestock, farming, cattle
- Non-Food:
  - Textile industry
  - Leather

### Risks identified in Vendor Brand Sourcing

In 2024, the Merchandise team conducted a desktop review of over 60 top-ranked vendor (by spend) brands. This initiative aimed to gain valuable insights into the country of origin and the types of products supplied. Based on previous modern slavery reviews we identified known inherent human rights risks in areas according to geographic risk, product or service risk, sector risk and supply chain risk.

#### Product Risk

The inherently high-risk product areas include.

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

#### Geographic Risk

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

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



#### Sector Risk

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

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

#### Non-Trade Supply Partner Risk

We recognise that some categories of goods and services we procure there is risk of modern slavery within our non-trade supply chains. Mapping this supply chain presents challenges due to our complex organisational structure. We are dedicated to establishing processes that identify and mitigate these risks.

Our non-trade suppliers supply various products, including uniforms, fixtures, and signage, as well as services such as third-party logistics and cleaning. Acknowledging that our non-trade supply chain carries a higher inherent risk, we are committed to enhancing our due diligence in identified high-risk areas, including uniforms, solar equipment, and labour hire.

#### Solar equipment

This year, we were unable to advance this action as planned. However, we recognise the growing concerns regarding modern slavery linked to renewable supply chains. Currently, we engage with two solar suppliers.

## Actions taken over the reporting period to Address Risks

As we enter our fifth reporting period, our commitment of continuous improvement remains a driving force in refining and embedding processes that reduce the risk of modern slavery within our operations and supply chains. We continue to monitor our risk environment through a combination of supplier screening, third party risk assessments, audit programs, grievances management, team member insights, regulatory trends, industry commentary, media, civil society reports, and engagement with government organisations. These diverse sources help us identify and prioritise our response to the most salient human rights risks, including emerging risks.

## Risks Identified by Third Party

Following Woolworths Group's acquisition of a 55% interest in Petstock Group, an assessment was conducted on our processes for managing human rights risk in our operations and supply chains, with particular focus on Own Brand Products.

Results of the review identified the lack of a policy commitment aligning with United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. The assessment also identified need for a more consistent risk review approach risk review across both own brand food and non-food products and further risk segmentation into own brand suppliers.

## Responsible Sourcing & Human Rights Policy (RSHR Policy)

This year we embedded an overarching policy commitment to respecting human rights. The Policy is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

The UN Guiding Principles are the recognised global standard for preventing and addressing business-related human rights harm. This policy encompasses our commitment to take action to prevent, mitigate and where appropriate, remedy modern slavery. It sets out the expectations of our team members, contractors and suppliers directly linked to products, operations or services. This policy applies to all Petstock team members, suppliers, contractors, third parties, and managed facilities, underscoring our commitment to ethical, safe, and sustainable sourcing practices.

## Due Diligence Mechanism

Grievance and remediation are key pillars of an effective human rights program. The UN Guiding Principles make it clear that businesses that identify that they have caused or contributed to adverse impacts such as modern slavery must provide for, or cooperate in, the remediation of that impact. In F24, we adopted the Speak Up Program. This independently hosted grievance mechanism, once fully rolled out, will allow Petstock to receive grievances from workers in our supply chain, which we can then work to remediate where required.

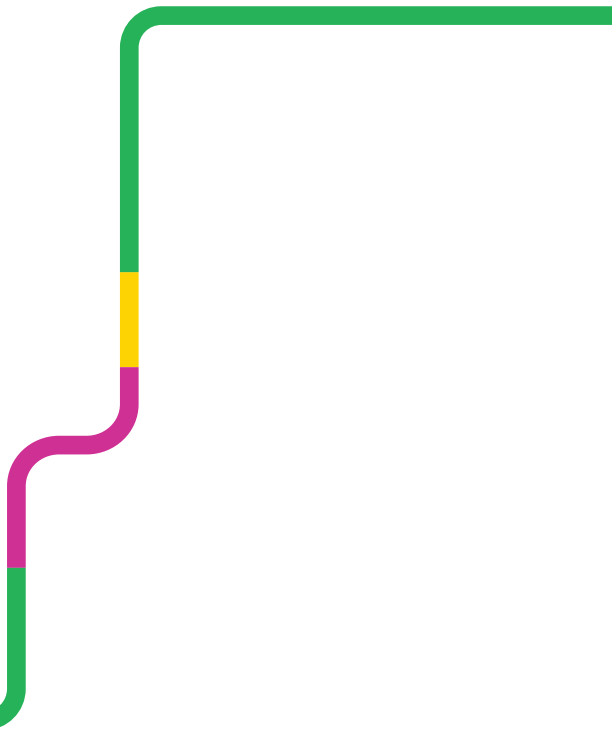
Our vision to create a better world for People, Pets, and the Planet underscores our belief that addressing modern slavery within our business supply chains can significantly impact its prevalence in the pet retail, care, and services industry.

We believe that the establishment of our framework, policies and programs, has allowed us to create substantial processes for identifying modern slavery risks. This ongoing commitment to improvement will continue to reduce our exposure to such risks throughout our entire network.

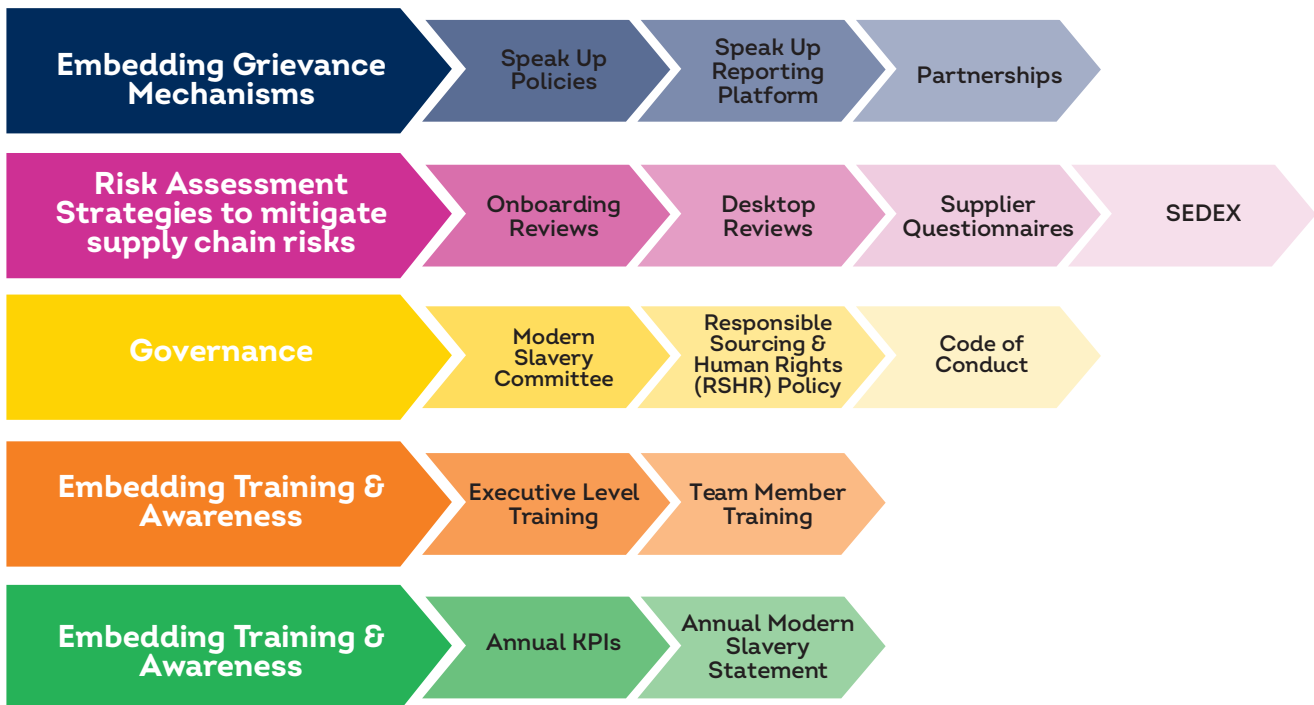
## Our Responsible Sourcing & Human Rights (RSHR) Program

Our RSHR program is integral to how we manage key risks to people, including modern slavery and broader worker rights risks, in our operations and supply chain. This program alongside our Modern Slavery Framework is informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Risks to our direct team members, including pay, physical and psychological safety and conduct, are primarily managed by the Group's People Team and the teams in which they work (e.g. Retail team or Finance team). Risks to indirect workers on Petstock Group sites (e.g. labour hire in distribution centres) are primarily managed by the relevant business units. The Modern Slavery WG provides advice to teams on frameworks and controls to help manage these risks.



### Our Modern Slavery Framework



## Governance

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

### Gaps in Governance

Through a review of our internal policies and documents related to modern slavery, we identified that we lacked a formal modern slavery policy and confidential reporting mechanisms. Without a dedicated policy outlining our commitment and the responsibilities we expect of our suppliers we risked exposing the Group to various operational and supply chain vulnerabilities. This included the possibility of sourcing products from regions with known human rights issues or collaborating with suppliers in countries linked to forced labour.

To minimise this risk, we developed and implemented a formal group policy that acknowledges our responsibility to source materials, products, and services in a way that minimises negative social and environmental impacts while promoting positive outcomes for workers, communities, and the environment. The policy also stated the requirements our suppliers to act in accordance with these principles and demonstrate good business practices. The Policy is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work

We had also identified that there was a need to maintain a grievance mechanism that is available to internal and external

stakeholders to raise a complaint or concern without fear of retaliation, intimidation, harassment or victimisation. To address this concern, we implemented a service that enables team members to report any suspicions or incidents of modern slavery safely and anonymously. This service ensures that employees have a secure channel to voice their concerns without fear of retaliation, reinforcing our commitment to upholding human rights and promoting a culture of transparency and accountability within our organisation.

Our suppliers were informed about our new Responsible Sourcing & Human Rights Policy and Speak Up Grievance Mechanism and Policy through a formal communication letter. This letter outlined the key principles of our new policies, emphasising our commitment to responsible sourcing practices and the importance of transparency throughout our supply chain. It also introduced the Speak Up Grievance Mechanism, encouraging suppliers to report any concerns or unethical practices without fear of retaliation. By sharing this information, we aim to foster a collaborative environment where our suppliers understand our expectations and feel empowered to uphold the same standards of integrity and responsibility in their own operations and across their suppliers.

### Responsible Sourcing and Human Rights (RSHR) Program Management

The Petstock Group Board provides oversight of our RSHR Program, including governance, review of key metrics, policy approval, and the annual Modern Slavery Statement.

Our Modern Slavery Framework is overseen by the MSSC, comprised of members from the executive leadership team, responsible for establishing and overseeing the framework across Petstock Group, including Petstock Group Reporting Entities. The Modern Slavery Framework emphasises the identification, assessment, and mitigation of modern slavery risks. It incorporates key aspects such as governance, risk assessment, due diligence, training, monitoring, and reporting.

It serves as a tool for continually improving our approach to modern slavery risk management.

The MSSC also oversees the WG, which collaborates with management, procurement, and buying teams to assess risks and promote consistency across the Group. The WG also engages with key teams, including the Own Brand Brands, Merchandising, and Operations teams, to manage modern slavery risks.

## Our Policies

In FY24, we focused on enhancing our governance structures to manage risks more effectively within our supply chain, particularly those related to human rights. We developed and implemented a comprehensive Group policy that aligns with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. This Responsible Sourcing & Human Rights Policy (RSHR Policy) is crucial for helping us to identify, assess, and mitigate risks associated with our suppliers and third-party relationships.

Our RSHR Policy is an integral part of our Modern Slavery framework, setting clear expectations for both our team members and suppliers regarding their business practices and supply chains. Compliance with this policy is mandatory for all team members and suppliers.

This year we also transitioned to a new Australian based whistleblowing service provider. Your Call, independently hosts our grievance program, Supplier Speak Up and manages the Speak Up platform for our suppliers and their workers. Our team members, suppliers (and their suppliers) and third-party contractors can call on this hotline service 24hours a day, 7days a week, to anonymously report or disclose

unethical or inappropriate behaviour or misconduct including behaviours of modern slavery. Your Call aligns with our RSHR policy and governance framework. Information regarding the new policy and due diligence reporting platform was made available to suppliers via a letter that directed them to a dedicated page on the Petstock Group website site. Additionally, we have posters available for suppliers and team members with the hotline phone number and instructions for making a call, we are currently updating modern slavery awareness training to incorporate “Speak Up” information and contact details.

By strengthening our governance structures this year, we have enhanced our ability to manage risks effectively, reinforcing our commitment to ethical practices and the protection of human rights throughout our supply chain. This proactive approach not only promotes transparency and accountability but also fosters trust and collaboration with our suppliers and partners.

We have implemented a range of policies and procedures that reflect our commitments and expectations to our team and suppliers and set the foundations for how we work across the Group and throughout our supply chain.



The following policies are those that are most relevant to assist us to prevent modern slavery among our team members:

### Team Member Policies

Policy	Purpose and Implementation
Code of Conduct	The Supplier Code of Conduct outlines how we expect team members (including contractors) to behave towards each other, our customers and the community, including compliance with the Responsible Sourcing & Human Rights Policy. Team members are required to complete code of conduct training during induction and then on a regular cycle.
Team Member Speak Up Policy and service	A reporting channel for team members and contractors, their families and associates to raise concerns confidentially and (if desired) anonymously.
<b>Responsible Sourcing and Human Rights (RSHR) Policy</b>	Underpinned by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the RSHR Policy sets expectations for our team members in relation to human rights and responsible sourcing, including modern slavery.

### Supply Chain Policies

Policy	Purpose and Implementation
Supplier Code of Conduct	The Supplier Code of Conduct sets out the minimum standards of ethical and responsible behaviour that we expect from our suppliers and business partners. It is based on International Labour Organisation (ILO) standards, Australian legislative requirements and accepted best business practice.
Supplier Speak Up Policy and service	Independently hosted reporting channel for all suppliers and workers, their family and community members to raise concerns confidentially and (if desired) anonymously.
<b>Responsible Sourcing and Human Rights (RSHR) Policy</b>	Underpinned by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the RSHR Policy sets expectations for our operations and all direct suppliers in relation to human rights and responsible sourcing, including modern slavery.



## Risk Assessment Process

To maximise our impact, we take a risk-based approach to supply chain management. This means we:

- Undertake desktop reviews to prioritise our work and understand where there is a higher likelihood of severe human rights impacts, including modern slavery
- Look for opportunities where we have greater influence to drive change within our supply chains
- Use a supplier and category segmentation approach based on inherent risk to determine which suppliers are in scope.

Own brand suppliers are prioritised for further due diligence. Own brand supplier sites are risk segmented into four segments - minimum, moderate, priority or specialised. The risk assessment considers a number of factors including country risk, third-party audit data and the nature of supplier relationships. A supplier's risk segment determines what further due diligence is required

### Own Brand Sourcing

The Team relies on third party manufacturers to produce our own brand products for resale, therefore we depend on supplier relationships and due diligence processes to maintain transparency and safeguard the wellbeing of workers in our supply chains. Suppliers of these own brand products are required to adhere to our RSHR Policy, manufacturing agreements which include our standards on modern slavery, health and safety and environmental responsibilities. This ongoing effort allow the team to ensure that products meet quality, safety and ethical responsibility.

Recognising the importance of responsible sourcing in our supply chain we undertake rigorous onboarding and review practices. This practice is designed to ensure that factories that supply own brand products to the Petstock Group, undergo site audits and assessments. These evaluations are critical in verifying that our suppliers adhere to strict standards regarding labour rights, workplace conditions, and overall ethical practices. Through these efforts, we aim to uphold our commitment to responsible sourcing and to the well-being of workers across our supply chain.

### Own Brand Food

Following a review that highlighted the need for greater transparency among our Own Brand suppliers, we prioritised an evaluation of our Own Brand food vendors to identify potential modern slavery risks within our supply chains.

An internal desktop assessment revealed an inherently medium modern slavery practices among these suppliers, which provide pet food, including seafood and meat. This evaluation was based on various risk factors, including product or service risk, sector risk, geographic risk, and supply chain risk.

To expand this assessment and understand how our suppliers are addressing human rights risks in their facilities, all own brand food suppliers were required to complete a self-assessment questionnaire (SAQ) via the SEDEX platform. If they were not connected to SEDEX, they were required to complete a manual version of the SAQ instead.

### Own Brand Food Supplier Assessment Results

We have identified greater risks and leverage among suppliers of our own brand products. Petstock is more directly connected to these products because suppliers are producing and manufacturing products directly for our business.

Own brand pet food suppliers were prioritised for further due diligence in F24. The majority of Petstock's own brand pet food suppliers are based in Australia, with only one supplier based overseas in Thailand.

The majority of our own brand pet food suppliers based in Australia have completed a SEDEX self-assessment questionnaire and will be required to complete this regularly. Our Thailand based own brand pet food supplier has a valid SEDEX Members Ethical Trade Audit which found no non-conformances and will be required to be re-audited in F25.

In F25, we will progress further due diligence with our own brand non-food suppliers.

### Vendor Brand Sourcing

To ensure responsible sourcing standards are met, all suppliers must comply with our Supplier Code of Conduct and Responsible Sourcing and Human Rights Policy. These guidelines set clear expectations regarding modern slavery, health and safety, and environmental responsibilities. Our ongoing efforts in this area allow the team to monitor compliance closely, ensuring that all products not only meet our quality and safety standards but also align with our Modern Slavery commitments. This proactive approach helps us maintain the integrity of our supply chains and fosters continuous improvement in responsible sourcing practices.

# Education, Training and Awareness

## Direct

In FY24 we conducted several briefing sessions with own brand team members food and non-food on potential modern slavery risks within our supply chain.

Compliance training on the Modern Slavery Awareness was expanded to include 2IC, 3IC, Vet Area Managers, Store Managers, Retail Op Managers, Marketing Managers, Support Teams and Warehouse leaders.

We are committed to ongoing engagement and education in Modern Slavery Awareness and in FY25 will roll incorporate participants feedback to include real-life scenarios, links to policies, our website and previous Modern Slavery Statements

## Indirect

In F24, we continue to engage with indirect workers, including labour hire personnel supporting activities at our NDCs and agency staff assisting our vet clinics, to meet the business's short-term needs.

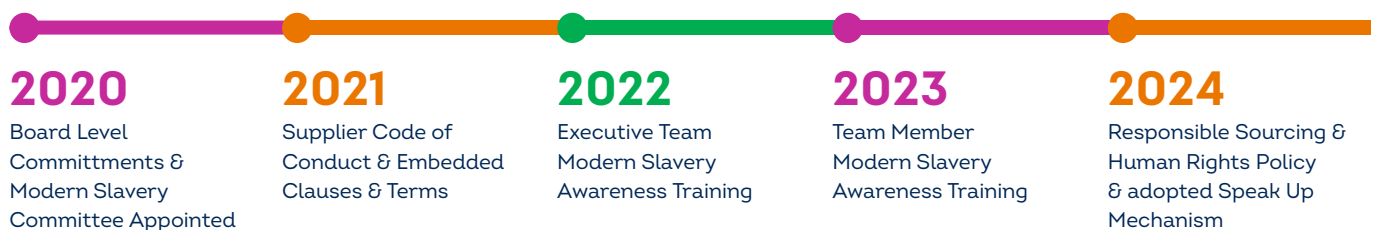
## Board Level and Executive Level Commitment

The Board and Executive team are aware of the Petstock Groups responsibility to continuously work to identify and address any modern slavery or serious exploitation that may be present in our operations and supply chains. The Petstock Group has established a MSCC and WG to enforce continuous improvement in this space.

The Petstock Board is updated quarterly and has the opportunity to review potential modern slavery risks, supplier risk profiles, or address areas identified for improvement.

## Timeline of Actions Taken to Address Modern Slavery

### Progress Highlights



# Assessment of the Effectiveness of Our Actions to Address Modern Slavery Risks in Our Operations & Supply Chains

Each reporting year we establish a set of Modern Slavery Key Performance Indicators (KPIs) to measure and evaluate the effectiveness of our efforts in addressing modern slavery risks. For FY24, the KPIs we set are outlined below, along with a commentary on our achievements.

## 1. **Develop a more integrated approach that is inclusive of a policy that refers to the UN Guiding Principles on Business and Human Rights (UNGPs).**

In FY24 we focused on embedded a more holistic approach to our Modern Slavery framework that included development of a comprehensive policy. The UN Guiding Principles on Business and Human Rights (UNGPs) and International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work provided us with a framework to measure and align our standards. Our RSHR policy applies to Petstock Group team members, suppliers, contractors, third parties to Petstock Group and the facilities that it manages (business partners). It sets out our commitment to respect internationally recognised human rights standards and ensure sourcing practices are ethical, safe and sustainable. This alignment allows us to benchmark against global practices and identify areas for continuous improvement.

## 2. **Design and deliver due diligence responsibilities along with a risk-based approach, including supplier action plans.**

To further enhance our Modern Slavery framework and establish due diligence mechanisms we adopted the Supplier Speak Up Platform and Policy. The Supplier Speak Up Platform is a reporting channel for team members and contractors, their families and associates to raise concerns confidentially and (if desired) anonymously. It enables anyone with the opportunity to anonymously report any concerns related to modern slavery. This platform will serve as an important tool for identifying issues as they arise, allowing us to take immediate action to address potential violations. All modern slavery related reports will be advised to the committee and board for further review.

## 3. **Sustain efforts to increase awareness and to aid in identifying modern slavery risk and high-risk areas by incorporating Modern Slavery education for new Team Members.**

We are committed to implementing efforts to raise awareness of modern slavery. To achieve this, we have integrated Modern Slavery education into the onboarding process for all new team members as is available to access for review at any time for all relevant team members. The training module is accessible to staff members, including Store Managers, 2ICs, 3ICs, Distribution Centre Managers, Team Leaders, and Support Office Staff. We measure the impact through tracking participation rates and taking on feedback to help us identify areas of the training program for further improvement.

## 4. **Continue to brief relevant leadership regularly on emerging issues, hotspot risks and risks.**

To ensure that our leadership team remains well-informed and proactive in addressing modern slavery concerns, we are committed to conducting regular briefings on emerging issues and hotspot risks. In FY24, we held four dedicated Modern Slavery Committee meeting. Across these meetings the MSCC signed off and approved the RSHR policy, Speak Up Policy and Supplier communication letter, tracked the progress of the KPI's and approved KPI's for the next reporting year as well as reviewed and approved the FY24 Modern Slavery Statement.

## 5. **Conduct a segmentation analysis of private label food and non-food private label suppliers to gain a deeper understanding of raw material sourcing.**

We undertook a comprehensive segmentation analysis of our own brand food suppliers. This review was undertaken to gain a deeper understanding of manufacturing sites across our own brand food supplier segments.

## 6. **Perform an ongoing assessment of current supplier agreements, policies and procedures to incorporate measure addressing modern slavery across the business.**

To ensure effectiveness and appropriateness we continued to assess governance materials to ensure they adequately incorporate measures addressing modern slavery throughout our operations and include statements referring to our new policy and Speak Up Platform.

## Our FY25 Plans

The Board of Petstock Pty Ltd (ABN 80 098 394 588) is pleased to present our fifth modern slavery statement, which provides a comprehensive overview of the actions taken by our business throughout FY24 to take action to prevent, mitigate and, where appropriate, remedy modern slavery in your entity's operations and supply chains.

We recognise that as a leader in the pet retail, pet care and services industry, the impact that our operational practices and supply chains could have on human rights. Overarched by our vision, *Together we make an impact for pets, their people and the planet.* We are committed to respecting human rights and ensure that it is embedded into all aspects of our operations.

Throughout this Modern Slavery reporting process, we have identified a range of potential modern slavery risks for our industry and have embedded actions to mitigate these risks. Our Steering Committee, facilitated by executives across the group continues to learn more about this evolving space and identify tools to help strengthen our modern slavery framework and compliance program.

Moving forward, we will continue to focus on key areas where we can make the greatest impact and where it is most relevant to the Group.

In FY24, we achieved several important milestones:

- We developed a new Responsible Sourcing & Human Rights Policy that applies to Petstock team members, suppliers, contractors, and third parties within the Petstock Group and the facilities we manage. This policy underscores our commitment to upholding internationally recognised human rights standards..
- We also established a process for addressing any adverse human rights impacts through our Speak Up Platform and policies.
- Our executive leadership team were engaged in dialogue on emerging issues and risks. We used updated results from our risk segmentation analysis to deepen our understanding of our supply chain risks including raw material sourcing.

We acknowledge that modern slavery is a complex and escalating issue that requires a collaborative focus through responsible sourcing and supply chain transparency. We will continue to collaborate with our team members and suppliers to identify and address modern slavery risk and improve transparency.

In the next reporting period, we will:

- Continue to monitor Modern Slavery cases reported through our Speak Up Program and investigate any cases identified
- Will review and roll out updated Modern Slavery Awareness training and report our training completion rates.
- We will enhance communications channels for Speak Up to ensure that our team members and suppliers know where and how to report a complaint or a grievance.
- We will extend the work we have done to date regarding risk prioritising of our brand suppliers and report on this.
- And we will continue to enhance supplier data for better visibility through reporting the number of supplier communications.

While we have made progress in understanding and mitigating our modern slavery risks during this reporting period, our success has come from embedding a culture of enhanced governance, transparency, and continuous improvement. We have established a clear approach for collaborating with our team members and key stakeholders, focusing on monitoring and identifying practices related to modern slavery. This effort aims to create a positive impact for people, pets, and the planet.



Shane Young  
**Chief Executive Officer**  
Date: 17/12/24



David Young  
**Managing Director**  
Date: 17/12/24

## Appendix One – Petstock Group Reporting Entities

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

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



**Petstock  
Group**

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