

# Petspiration Group Modern Slavery Statement FY21



### Statement on the Reporting Entity

PETstock Pty Ltd (ABN 80 098 394 588) ('**PETstock**') makes this joint modern slavery statement on behalf the Petspiration Group ('the **Petspiration Group**').

This statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) and reports on the actions of the Petspiration Group, which 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.

### Consultation

The Petspiration Group has policies, systems and procedures that apply broadly across our business. To prepare this joint statement, PETstock consulted the entities we own or control.

Our modern slavery working group consulted relevant management, procurement and buying teams from entities we own or control. We gathered some information about the supply chains and operations for each of the Petspiration Group leaders for entities that we own or control, and reviewed the processes that they have in place to monitor and address modern slavery risk. This modern slavery statement was also circulated to relevant members of our leadership team for comment prior to being put to the Board of PETstock for review and approval.

This modern slavery statement was approved by the Board of PETstock on **15 December 2021**.



## Table of Contents

<b>1. INTRODUCTION .....</b>	<b>4</b>
<b>2. MODERN SLAVERY STATEMENT OVERVIEW .....</b>	<b>5</b>
<b>3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS .....</b>	<b>6</b>
<b>4. RISKS OF MODERN SLAVERY PRACTICES .....</b>	<b>11</b>
<b>5. ACTIONS TAKEN TO ADDRESS RISKS .....</b>	<b>15</b>
<b>6. ASSESSMENT OF THE ACTIONS TAKEN TO ADDRESS RISKS .....</b>	<b>19</b>
<b>7. MOVING FORWARD .....</b>	<b>20</b>
<b>APPENDIX A: ENTITIES CONTROLLED BY PETSTOCK PTY LTD.....</b>	<b>22</b>



## 1. Introduction

PETstock is an Australian owned and operated business, which started in regional Victoria in 2002. Our vision is to create a world class retail experience both in our stores and online. Our business is built on the foundation of family values, fun & a healthy lifestyle.

This statement has been prepared to meet reporting requirements under the Australian *Modern Slavery Act 2018* (Cth). This modern slavery statement outlines the actions that have been taken by the Petspiration Group to identify, assess, and address the modern slavery risks across our operations and supply chains in the year ending 30 June 2021.

During FY21, the Petspiration Group continued to work on processes that will allow us to identify where any risks of modern slavery or serious exploitation may be present in our supply chains. This includes any incidences of trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. We are still working to review and gain a better understanding of our supply chains and operations.

A significant amount of the work that we have undertaken during FY21 has involved setting up systems across the business to work towards the goals we identified in our FY20 Modern Slavery statement, with a view to roll out these initiatives and processes during the FY22 reporting period.

We are proud of our business and understand that ultimate responsibility for the prevention of modern slavery in our supply chain and operations rests with our leadership and management team. This is why we are committed to the ongoing investigation of our exposure to potential modern slavery risks. We understand that the Petspiration Group will need to do further due diligence to discover, fully understand and report on our risks moving forward, and we are committed to continue this important work during FY22.



Shane Young  
**Chief Executive Officer**  
Date: 15 December 2021



David Young  
**Managing Director**  
Date: 15 December 2021



## 2. Modern Slavery Statement Overview

The mandatory criteria and reporting requirements pursuant to section 16 of the *Modern Slavery Act 2018 (Cth)* have been addressed in this statement as follows:

### 1. Identification of the reporting entity

This is addressed in the content on page 2.

### 2. Description of our structure, operations, and supply chain

This is addressed in the content on pages 6 - 10.

### 3. Description of the risks of modern slavery practices in our operations and supply chains and any entities we own or control

This is addressed in the content on pages 11 - 14.

### 4. Description of the actions we have taken to assess and address these risks (including due diligence and remediation processes)

This is addressed in the content on pages 16 – 19.

### 5. How we assess the effectiveness of our actions

This is addressed in the content on page 5.

### 6. Description of the process of consultation with any entities the reporting entity owns or controls

This is addressed in the content on page 2.

### 7. Any other relevant information

This is addressed and included in the content on pages 14, 15, 20, 21 and 22 where we discuss the development of supplier relationships, the impact of the COVID-19 pandemic and our goals moving forward.



### 3. Our Structure, Operations and Supply Chains

PETstock was founded in Ballarat, Victoria and its support office and flagship stores still operate in Ballarat. PETstock derives its revenue from the sale of pet products and services through its retail stores, ecommerce and also the operations of veterinary facilities. Since 2012, PETstock has operated as a franchise organisation and now has over 180 sites and 3 support offices across Australia and New Zealand.

Our PETstock retail stores provide pet products and services. Our product range includes food, healthcare, grooming, apparel, accessories, training, cages, tanks and clean-up for cats, dogs, horses, fish, small animals, reptiles, chickens and birds. Our pet service range includes grooming, DIY Wash, puppy school, pet adoption, cat boarding, pet ID tags, water testing, and dog daycare.

PETstock Vet operates veterinary facilities and services – within both our PETstock retail stores and at stand alone sites. PETstock also partners with FurLife Vet Clinics in select regional locations around Australia.

PETstock Assist is our charity foundation which is committed to making a long-term difference and positive change in the lives of pets and humans through education and raising awareness.

PETstock also sells through a number of eCommerce sites including Pet.co.nz and Petmarket.

Our support offices provide training, human resources, retail management, marketing, IT and administration services to our retail stores, veterinary facilities and services, e-commerce sites, our charity foundation and our franchises.

#### Our Suppliers

We are involved in the direct manufacture of some own-branded PETstock products - our “Glow” range and some of our equine products.

The Petspiration Group mainly relies on third party manufacturers to produce our products for re-sale. Based on the review of our supply chain that we conducted during our first desktop review in FY20, we identified that PETstock mainly sources products made in the following countries:

- Australia
- China
- India
- USA
- New Zealand
- Germany
- France
- Canada
- The Netherlands












- United Kingdom
- Belgium
- South Africa
- Taiwan
- Thailand



## Our Large and International Brand-Name Product Suppliers

Like most large Australian retailers, many of the Petspiration Group's main suppliers are large international suppliers of pet food and pet products, which have either completed their own modern slavery statements or have made some ethical sourcing and sustainability information about their businesses publicly available.

We have listed some of our main suppliers in the interests of transparency, and for the purposes of describing and illustrating our complex supply chain and operations. Some of our larger suppliers include:








	<p>Ebos is a marketer and distributor of the following brands that supply the Petspiration Group – <b>Lyppard, Masterpet (Vitapet, Aristopet, Blue Planet, Trouble and Trix, Yours Drooly, Joy and Blackhawk) and Animates.</b></p>
	<p>Mars Pet food brands include <b>Pedigree, Whiskas and Royal Canin.</b></p>
	<p>Colgate Palmolive has operations in over 70 countries and sells its products in more than 200 countries and owns Hill's Pet Nutrition which supply <b>Hill's Science Diet and Hill's prescription Diet.</b></p>
	<p>Nestle owns Nestle Purina Pet Care which supplier – <b>Purina, Purina One, Purina Alpo, Purina Felix, Purina Pro Plan, Purina Cat Chow, Purina Fancy Feast, Purina Chef Michael's, Purina Bakers, Purina Friskies, Purina Dog Chow and Purina Beneful and Purina Gourmet.</b></p>
	<p>Boehringer Ingelheim provides preventive <b>animal healthcare products and vaccines, parasiticides and animal pharmaceuticals.</b></p>
	<p>Bayer supply the Petspiration Group with flea, tick and worming products including <b>Advocate, Kiltix, Drontal, Seresto, Advantage, Profender and Advantix.</b></p>
	<p>Based in South Africa, Rogz supply the Petspiration Group with collars, leads, bowls, car safety belt clips, treat dispensers and other products.</p>
	<p>Ridley Corporation Limited, through its subsidiaries, operates stockfeed mills, which produce and distribute animal feed products for the beef, dairy, pig and poultry industries. It a provider of provider of animal nutrition solutions (dog food, chicken feed), it supplies the following brands <b>Barastoc, Cobber and Primo.</b></p>
	<p>Hagen Group provides the Petspiration Group with aquatic products, fish food, biological enhancer, products for tanks and habitats, bowls, feeders, disposable diaper for pets and training pads. Hager Group provides PETstock with a range of products</p>



	including those from the brands <b>Fluval, Fluval Sea, Marina, Exo Terra, Zoe, Catit, Dogit, Libing World, ZooMed and Glo.</b>
	Elanco provide animal health solutions such as <b>antibacterials, anticoccidials, and parasiticides</b> and products that prevent and treat disease, improve and extend quality of life, and improve the type of care that pets receive.
	Canidae are a US based pet food company that supply the Petspiration Group with dry cat and dog food.
	MSD is a large animal health company that supplies the Petspiration Group with <b>Bravecto</b> flea and tick treatments.





### Our Local Wholesalers and Other Product Suppliers

The Petspiration Group is in the process of fully identifying and tracing our smaller local and overseas suppliers, manufacturers and wholesalers with a view to improving our supply chain transparency and further identifying our modern slavery risks. The Petspiration Group sources a large number of its products for resale through large locally based wholesalers and our speciality product suppliers based in Asia, Australia and New Zealand. Some of our main local and smaller overseas suppliers include:

	PETstock Asia supplies stores with products sourced from 38 factories across China and India. These products include pet carriers, pet bedding, pet toys, crates, pet pens, scoops, pet waste bags, collars, bowls and feeders.
	Based in Hong Long, Vanilla Sugar helps create, design, manufacture and supply tailor made private label products to the Petspiration Group.
	Blackdog Pet Food Company is an Australian company specialising in the manufacture, distribution and marketing of pet treats.
	Ezydog Australia supplies leashes, harnesses, collars, float vests, backpacks, leather products and accessories.
	Ziwi Peak Ltd is a New Zealand based supplier of quality dog and cat food. Ziwi Peak have published information about the origin, quality and sustainability their seafood – which they advise is sourced in New Zealand.
	Australian supplier of aquatic plants, driftwood creations, live food and frozen feeders.
	The Kent Pet Group supply the Petspiration Group with cat litter products.





	<p>Provide of 4000 + pet food products, toys, health and accessories. Brands sourced include IAMs, Hill Science Diet, Advance, Kong, Bayer, Boehringer Ingelheim and equine products.</p>
	<p>Eastern Distributors is a Victorian based stockfeed and petfood supplier.</p>
	<p>SVS NZ clinical Support provides veterinary supplies, consumables, equipment &amp; instruments.</p>
	<p>The Petspiration Group sources some of its saddlery and equine products through Equine Holdings Pty Ltd (trading as Europa Saddlery).</p>
<p>SYD HILL &amp; SONS</p>	<p>Syd Hill &amp; Sons are Australian-based and supply the Petspiration Group with a range of saddlery products.</p>

### Suppliers of Goods and Services Not for Re-sale

The Petspiration Group sources goods and services to support our stores, support office and to fulfil our other logistical requirements. During FY22 we will continue review our goods and services 'not for resale' such as:



### Our FY22 Supplier Review

During FY22, we will commence work on our full product supplier review with the aim of gathering more detailed information about the supply spend for the Petspiration Group, and we will aim to segment this by country/region/category in our future statements. The information that we will endeavour to gather will include:

- the total number of suppliers to the Petspiration Group;
- the number of suppliers by direct/indirect (or by tier 1, tier 2 etc); and
- the number of suppliers by country/ region.





We will also aim to set out some more detailed information on our supply spend by category once we have completed our supplier review process.



## 4. Risks of Modern Slavery Practices

We understand that modern slavery exists across all large businesses and retail sectors and is also therefore likely to exist in some parts of our supply chains and operations. Given the complex nature of our corporate structure and supply chains, the task of mapping our supply chains and operations is a difficult one. We understand however, that it is important for us to continue our work in this area, to ensure that we do not inadvertently allow modern slavery to exist in our operations.

These include our modern slavery risks that are associated with:



The initial risk assessment on our supply chains and operations has identified a number of modern slavery risks relating to:

### 1. Supply Chain Transparency

The products that the Petspiration Group sells are at the end of a complex supply chain, and we are only at the start of the process of identifying and reviewing all of our first tier (and some second tier) suppliers. Many of the products the Petspiration Group sells are sourced through agents and wholesalers in Australia and New Zealand, and so we do not have full visibility over our supply chain (in terms of where those products are made or sourced from) as yet. This review is a detailed and time intensive process, and we will work on this during FY22.

### 2. Geographic Risk

#### Australia

The Petspiration Group's national support office is split across two locations - in Ballarat and South Melbourne, Victoria. As most of our staff are employed in Australia, this lowers the risk of modern slavery risk in regard to our local workforce. This is due to the strong Australian regulatory framework which includes the Occupational Health and Safety Act 2004 and the Fair Work Act 2009.



We are however aware that there may be modern slavery risks for us when we source and contract externally for cleaning services, security arrangements, freight, distribution, construction, store fit outs and logistics.

We also know that some of the types of service providers that we might use, may rely on a workforce that includes migrants, low-skilled workers or people from cultural or linguistically diverse backgrounds. The Petspiration Group may also rely on recruiters or third-party labour hire services, which we understand increases our modern slavery risks.

These risks will be further explored and addressed during our planned review of suppliers of services and goods not for resale.

### **China, India and Pakistan**

The Petspiration Group sources some materials, products and services from source countries that have been identified by organisations such as the Walk Free Foundation (Global Slavery Index 2018) as having a high prevalence of modern slavery and human rights violations. Some of the products we sell are made in China, India and Pakistan, areas which have been reported by the Global Slavery Index as having the highest absolute number of people living in modern slavery (which accounted for 60 percent of the victims in the region)<sup>1</sup>.

We are aware that as a responsible corporate citizen, the Petspiration Group needs to take steps to identify and manage this risk.

We are aware of the widely published allegations of forced labour of minority groups in Xinjiang and Dandong and have included content on this in our Supplier Code of Conduct.

Some of the leather products that the Petspiration Group sells are sourced mainly through our suppliers, Europa Saddlery and Syd Hill & Sons. Our equine team deals with suppliers from China, India, Taiwan, Pakistan, England and Germany. Our past reviews have indicated that some of the leather products sold by the Petspiration Group were being sourced from Kanpur, Uttar Pradesh (India) and also Punjab (Pakistan). During the COVID-19 crisis, we became aware that the Uttar Pradesh government made an ordinance exempting most businesses and industries from labour laws for the next three years, as a measure to get the State's industrial activities back on track in wake of the COVID-19 crisis.

Our suppliers of leather products have advised, that currently, the leather used is all imported into India from countries like Argentina, Brazil, Italy, Turkey and England. To the best of their knowledge, no tanning process for the leather products is completed in India i.e. the leather arrives to our Indian manufacturers already tanned.

Our leather product suppliers have advised that it is obviously challenging at the moment for them to understand fully what is happening within factories overseas (i.e. without the possibility of visitation due to Covid restrictions) but measures are in place to ensure all of our supply chain are in line with business and company standards. They have advised that

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<sup>1</sup> <https://www.globalslaveryindex.org/2018/findings/regional-analysis/asia-and-the-pacific/>



importantly, our strong relationships and longevity with these suppliers has ensured that our communication and alignment through the pandemic has been strong.

Our suppliers have advised that they have been working closely with suppliers to ensure the Petspiration Group supports its leather suppliers through the pandemic, and to enable consistent supply of product from our long term suppliers. This has included ongoing, regular communication via email, WhatsApp and virtual catch ups.

It will be a continuing process for the Petspiration Group to be able to gather more detailed information from all its overseas suppliers of leather products so that we can work to manage our risks.

To date, the Petspiration Group has only been able to gather certification information from its linked and direct suppliers out of Asia. PETstock Asia also requires its factories to complete a Modern Slavery Due Diligence Questionnaire and also sign the PETstock Asia Supplier Code of Conduct.

### 3. Sector Risk

The Petspiration Group is aware that there are modern slavery risks that are inherent in the pet food and product industry, relating to the sourcing of raw materials such as meat and seafood, and the production of many pet related products in the Asia Pacific.

Within the Petspiration Group's supply chains, the following key products have been identified for further investigation during FY22:

- **Cotton and Textile products** – such as pet beds and pet clothing;
- **Leather Goods** – such as saddlery, leads and collars;
- **Finished Goods** – supplied by manufacturers in regions or countries with high modern slavery risk profiles; and
- **Pet foods and treats** – made using meat, seafood, poultry, food additives and/or palm oil.

We will continue to take steps to review the products sourced from our suppliers to identify related risks during FY22.

### 4. Supplier Relationships and the Impact of COVID-19

The challenge of working towards our second year of modern slavery reporting has continued to be exacerbated by the impact of COVID-19, and the need for our staff to focus on business imperatives.

We are also aware that during the COVID-19 pandemic, the risks of modern slavery in our supply chain may have increased, and that there has been less opportunity for this to be monitored or addressed by us (and our direct suppliers) due to travel restrictions.

The pandemic has had some impact on our supply chains, mostly with our Indian supply trade, and we have also had to order products earlier from China.



The Petspiration Group's procurement teams and other staff have been working consistently to develop strong, mutually beneficial and ongoing relationships with our suppliers. We consider our supplier relationships to be valued partnerships.

During FY21 we have considered the impact of the COVID-19 pandemic on our operations and supply chains. We are aware that this crisis may have elevated our modern slavery risk, as a result of pressure being placed on our suppliers and factories, with flow on effects for workers.

In order to address and mitigate these risks, we have taken steps as follows:

- **Adoption of responsible purchasing practices (as we can)** – for example, with regard to the sourcing of our leather products, any order placed is honoured and we have had no cancellations made post order placement with any factory. Some of our suppliers have advised that changes to orders will only occur if factories are not meeting timelines or quality standards (any with any supplier domestically or internationally). Cancellation or changes to orders are only made after multiple discussions, and constant communication on performance. We also use multiple factories to ensure business is spread across a number of factories that all have proper standards in place.
- **Payment support for suppliers** - some of our orders have been paid up front as a deposit to guarantee the order and to assist with raw material purchasing at the supplier/manufacturer end. This has become very important throughout the pandemic as it has provided suppliers with assurances around purchasing raw materials.
- **Close engagement with suppliers to adequately support them** - some of our buyers have been in daily contact across multiple suppliers and manufacturers to ensure alignment.

During the pandemic, the Petspiration Group has also had challenges in terms of monitoring of conditions and payments for workers, such as:

- **Commitment to paying a living wage to workers** - our suppliers have reported that this has been very difficult to monitor during the pandemic. The assumption has been made that factories will not be able to produce product unless workers are properly paid, as workers will not come to work if this does not happen. These issues have also been reviewed by the business prior to the pandemic, and factories that have been selected to become suppliers to the Petspiration Group have put in place consistent standards around worker's rights and conditions.
- **Undertake meaningful engagement with relevant suppliers on site** – our suppliers have reported that this cannot really be addressed until full visitation of factories is possible post pandemic.
- **Transparency about the full supply chain** - this can be acquired and documented more consistently when the Petspiration Group's staff are able to visit factories again.



## 5. Actions taken to Address Risks

The Petspiration Group has taken the following actions in FY21 to address our identified modern slavery risks. We will continue to review and address the modern slavery risks in our operations and supply chains moving forward.

### Board Level Commitment

The Board and management of the Petspiration Group is aware of its social and corporate responsibility to work to identify and address any modern slavery or serious exploitation that may be present in its operations and supply chains. The Petspiration Group has established a modern slavery working group and committed resources to continuous improvement in this space.

### Development of Modern Slavery Training for Staff

During FY21, the Petspiration Group retained external consultants to develop an online Modern Slavery Training module for our relevant staff or suppliers to complete.

This training has been designed to assist staff and suppliers to understand modern slavery and reporting requirements, and to allow the identification of modern slavery related issues and risks in the Petspiration Group's supply chain and operations.

The Petspiration Group's Modern Slavery Training module will covers topics including:

- Why does the Petspiration Group need to address modern slavery?;
- What is modern slavery?;
- COVID-19 and associated modern slavery risks;
- The Petspiration Group's Supplier Code of Conduct;
- Practical things that staff can do to identify and address modern slavery risks;
- The importance of knowing your suppliers;
- The importance of knowing your risky products and services; and
- Product sourcing and how to gather information from providers of products and services.

The training will also provide our teams with information about the business' reporting obligations under the Modern Slavery Act 2018 and modern slavery legislation and initiatives around the world.

Staff will also be provided with the opportunity to ask questions and request more information about specific industry or product related modern slavery risks from our external modern slavery consultants when they complete the training module.

The roll out of this training will commence in FY22. We will keep a record of all training offered and completed during the training roll-out.

### Supplier Review and Audit Processes

The Petspiration Group has begun preparation for the process of fully reviewing its suppliers of products (goods for resale), which will commence during FY22.



Our modern slavery working group has been preparing audit check forms to send to our suppliers for their completion. They will ask for our suppliers to provide the working group with information including:

- whether their business/ staff has done any modern slavery training;
- if they have any current independent audit reports or certification documents that may demonstrate their compliance with the relevant requirements set out in the Petspiration Group's Supplier Code of Conduct (which they will be sent and asked to adhere to);
- if they are able to provide any recent independent audit reports, certification documents or other evidence of compliance with the Code of Conduct in relation to the products that they supply the Petspiration Group; and
- if they have written policies on matters such as wages, compensation, discrimination, harassment in the workplace, health and safety, freedom of association, no child labour, no forced labour, checks to be done on suppliers of raw materials and a grievance system for workers.

During FY22, the Petspiration Group will also prepare for the review of the Petspiration Group's suppliers of goods not for re-sale such as cleaning services, security, construction, store fit outs, freight to customers etc.

### Update and Development of Internal Policies and Processes

During FY21, we also worked on the development of a Petspiration Group **Supplier Code of Conduct** which sets out fundamental requirements for all of our suppliers and business partners (including all authorised sub-contractors or raw materials suppliers). We are currently reviewing this Code within the business and will work towards rolling this out to our suppliers during FY22.

The Supplier Code of Conduct will set out in some detail, the minimum standards of ethical and responsible behaviour that we expect from our suppliers. Reference in the Code to 'suppliers' will mean any supplier, contractor, consultant and individual (and their subsidiaries, affiliates and subcontractors) that supply goods or services to the Petspiration Group, and reference to 'workers' will include employees, contractors, agency and temporary staff of the supplier.

The Petspiration Group will work with its suppliers and business partners to support them to meet and to hopefully exceed the minimum requirements outlined in this Code, but will also take action if suppliers are not prepared to adhere to the Code (which may involve cancelling or terminating agreements with suppliers and ceasing to do business with those suppliers).

### All suppliers to the Petspiration Group will be asked to agree to take actions such as:

1. Take steps to identify and eliminate:
  - a. slavery or forced servitude of any kind;
  - b. trafficking in persons;
  - c. forced labour;





- d. debt bondage;
- e. labour facilitated by any form of coercion or deception;
- f. child labour;

in all of the supplier's (and any authorised sub-contactor's) operations and supply chains.

2. Comply with all relevant local laws and regulations – and where a conflict in law or requirements arises, apply the highest standard.
3. Adopt and adhere to conditions of employment for workers that ensures non-discrimination, respect and safeguards their rights under local labour laws and regulations.
4. Provide a safe and healthy workplace - which meets or exceeds the requirements of all relevant health and safety laws or requirements and is designed to prevent accidents or injury to workers.
5. Ensure that all workers are paid a fair living wage and all legally mandated benefits – which should be at least the minimum wage required by applicable local laws or industry standards.
6. Ensure workers are not required to work in excess of the number of hours permitted by applicable local law.
7. Provide transparency in relation to any relevant supply chains and operations - including disclosure to the Petspiration Group of sources of raw materials, manufacturing sources or other information relating to the supply of goods or services - upon request from the Petspiration Group or its authorised representative.
8. Provide to the Petspiration Group (upon request), information regarding sustainability, workforce, country of origin and other relevant information to the provision of services or the manufacture of products that are supplied to the Petspiration Group.
9. Ensure third parties acting on their behalf comply with the Code.

In the coming years we will also work on the development of a set of **Global Sourcing Principles** which will set out the fundamental requirements and minimum standards that must be followed by our suppliers.

We will also be developing **Supplier Remediation Guidelines** to provide general guidance to staff, suppliers and its auditors if there is a need to remediate or address issues that are identified as non-compliance with the fundamental requirements of our Code of Conduct.



This will include a **Corrective Action Plan** and supporting documentation for staff and suppliers.

We will also be working to update our current **Whistleblower Policy** to ensure that staff, suppliers and workers are made aware that the Petspiration Group supports the disclosure by individuals of modern slavery or other wrongdoing that may be occurring within the Petspiration Group's operations and supply chains.



## 6. Assessment of the Actions Taken to Address Risks

The modern slavery working group has developed a set of **modern slavery KPIs** which will allow us to measure and evaluate the effectiveness of the actions we have taken to address our modern slavery risks moving forward.

During FY21 we developed a set of **Modern Slavery KPIs** to allow us to monitor our efforts to address our modern slavery risks during FY22. These are:

1. Roll out our modern slavery training module to all relevant staff during FY22.
2. Obtain approval of our Supplier Code of Conduct and provide our suppliers and business partners with a copy of the Code for them to sign and agree to during FY22.
3. Conduct a full review of the Petspiration Group's suppliers of products for resale.
4. Prepare for the review of the Petspiration Group's suppliers of goods not for re-sale such as cleaning services, security, construction, store fit outs, freight to customers etc during FY23.
5. Roll out updated terms and conditions to all suppliers which expressly refer to modern slavery requirements during FY22-23.
6. Identify opportunities to collaborate with groups from existing networks that are focused on the management and eradication of modern slavery.
7. Prepare draft FY22 Modern Slavery Statement for Board approval.



## 7. Moving forward

The Petspiration Group is committed to:

**Working on open communication and transparency within our business** - to ensure that our Board and Management are well informed about our ongoing modern slavery risks and challenges and the importance of the work required to address these risks.

**Developing stronger and more open relationships with our suppliers** - to foster free communication and transparency about their operations and the manufacture of products that the Petspiration Group sources and sells. We will also be taking steps to monitor and address the risk of modern slavery practices associated with sub-contracting and will be taking steps to review and address this if required. For example, our suppliers of leather products will be resuming factory visits during 2022 (or as soon as possible) and will be conducting checks to ensure that workers are being treated fairly and that conditions are in line with expected Petspiration Group standards.

**Monitoring the effectiveness of our modern slavery training** – including keeping track of the number of staff that have completed the training, and seeking staff feedback on the effectiveness of the training program and their level of engagement. We will also review our training program to determine if the online training should be rolled out to additional staff, and possibly to some of the suppliers with whom we have direct dealings.

**Reviewing the audits and supplier checks** – this will be done as part of our supplier review process. We will be asking suppliers to provide the Petspiration Group with any recent independent audit reports, certification documents or other evidence of compliance with our Supplier Code of Conduct (in relation to the products that they supply the Petspiration Group). This evidence will be reviewed by our modern slavery working group, and we will on this in the next modern slavery statement following the completion of the review.

**Developing new partnerships with local and overseas community organisations** - which will allow us to further understand our obligations and role, and will allow us to seek feedback on the progress we have made so far, and also to gather evidence about where we can go next.

**Our Whistleblower process** - and the investigation of any issues that come to our attention. We will also work on ways to provide and promote an avenue for workers to bring any issues of non-compliance with our Supplier Code of Conduct to our attention and to encourage an open culture and feedback.

**Improving our online corporate and social responsibility presence** – during FY22 we will continue work on the publication and transparency of our supply chain and making the processes and policies that have developed available to our customers and the world at large. We consider that this will allow our customers to confirm that they are dealing with a





responsible supplier of pet products, which is committed to the process of eradicating modern slavery from its supply chains and operations.



## Appendix A: Entities controlled by PETstock Pty Ltd\*

Petstock Vet Pty Ltd (ACN 128 415 734)	Petstock (Tamworth) Pty Ltd (ACN 608 715 608)
Petvet Altona North Pty Ltd (ACN 600 301 139)	Petstock (Indooroopilly) Pty Ltd (ACN 127 745 626)
Petvet Craigieburn Pty Ltd (ACN 601 406 946)	Petstock Toowoomba Pty Ltd (ACN 127 794 432)
Petstock Vet (Essendon) Pty Ltd (ACN 614 669 135)	Petstock (Darwin) Pty Ltd (ACN 605 038 293)
Petstock Vet (Gregory Hills) Pty Ltd (ACN 615 558 319)	Petstock (Belmont WA) Pty Ltd (ACN 613 017 931)
Petstock Vet (Lilydale) Pty Ltd (ACN 620 312 316)	Petstock (West Gosford) Pty Ltd (ACN 604 821 463)
Petstock Vet (North Lakes) Pty Ltd (ACN 607 523 197)	Petstock Baldivis Pty Ltd (ACN 126 086 708)
Petstock Vet (Robina) Pty Ltd (ACN 621 175 219)	Petstock Wagga Wagga Pty Ltd (ACN 163 732 821)
Petstock Vet (Toowoomba) Pty Ltd (ACN 619 337 227)	Petstock (Cannonvale) Pty Ltd (ACN 618 353 709)
Petstock Vet (Waurin Ponds) Pty Ltd (ACN 619 378 237)	Petstock Joondalup Pty Ltd (ACN 130 831 097)
Petstock Vet (Bennetts Green) Pty Ltd (ACN 645 824 184)	Petstock (Hervey Bay) Pty Ltd (ACN 159 035 462)
Petstock Vet (Clyde North) Pty Ltd (ACN 649 697 536)	Petstock (Dural) Pty Ltd (ACN 126 160 861)
Petstock Vet (Rouse Hill) Pty Ltd (ACN 603 905 764)	Petstock (Townsville) Pty Ltd (ACN 151 976 635)
Pet Post (Australia) Pty Ltd (ACN 633 073 177)	Petstock (Rouse Hill) Pty Ltd (ACN 603 905 586)
Pet Market (Australia) Pty Ltd (ACN 637 079 595)	Petstock (Caboolture) Pty Ltd (ACN 610 198 528)
PS Equine Pty Ltd (ACN 620 228 588)	Petstock (Noosa) Pty Ltd (ACN 164 948 789)
Equine Holdings Pty Ltd (ACN 633 418 078)	Petstock (Balcatta) Pty Ltd (ACN 134 643 137)
Syd Hill & Sons Pty Ltd (ACN 627 716 018)	Petstock ACT Pty Ltd (ACN 131 907 045)
Petstock Retail Pty Ltd (ACN 127 690 466)	Petstock (Taylors Lakes) Pty Ltd (ACN 144 866 768)
Petstock (Altona North) Pty Ltd (ACN 600 092 171)	Petstock (Shepparton) Pty Ltd (ACN 132 045 553)
Petstock (Ashmore) Pty Ltd (ACN 119 636 458)	Petstock Rural Pty Ltd (ACN 645 712 223)
Petstock (Ballarat) Pty Ltd (ACN 051 338 295) T/as Ballarat Central T/as Delacombe	Petstock North Sydney Pty Ltd (ACN 160 875 052)
Petstock (Bendigo) Pty Ltd (ACN 128 486 742)	Petstock Mini Pty Ltd (ACN 166 638 811)
Petstock (Braeside) Pty Ltd (ACN 128 414 095)	Petstock Geelong Pty Ltd (ACN 103 220 524)
Petstock (Chelsea) Pty Ltd (ACN 111 785 534)	Petstock North Qld Pty Ltd (ACN 603 250 853)
Petstock (Craigieburn) Pty Ltd (ACN 166 638 482)	Petstock Tasmania Pty Ltd (ACN 649 144 589)
Petstock (Erina) Pty Ltd (ACN 129 430 208)	Hart Retail Group Pty Ltd (ACN 112 460 401) T/As: Allenby Gardens Burnside Melrose Park Mount Barker Munno Para Noarlunga Parafield Port Lincoln Sefton Park
Pet Source Pty Ltd (ACN 120 944 505)	Petvet Brighton Pty Ltd (ACN 168 114 627)
Petstock (Mitcham) Pty Ltd 121089521	Petstock Vet (Carrum Downs) Pty Ltd (ACN 622 186 618)
Petstock (Morningson) Pty Ltd (ACN 128 338 072) T/as Morningson Central	Jahaps Pty Ltd (ACN 635 102 126)
Petstock (MP) Pty Ltd (ACN 124 069 629)	AAH Veterinary Clinics Pty Ltd (ACN 622 225 683)
Petstock (Vermont) Pty Ltd (ACN 127 746 490)	Wandoo Great Pty Ltd (ACN 149 200 439)
Petstock (Bathurst) Pty Ltd (ACN 167 386 469)	Petstock Qld Pty Ltd (ACN 146 411 092) T/as Petstock Kawana and Maroochydore
Petstock (Coffs Harbour) Pty Ltd (ACN 159 851 064)	PS NSW Group Pty Ltd (ACN 149 212 322) T/as Petstock: Adamstown Bennetts Green Cameron Park Heatherbrae Warners Bay
	Petstock Inner East Melbourne Pty Ltd (ACN 636 839)

\* As at 15 December 2021





677) T/as Petstock Camberwell and Hawthorn East  
Petstock (Essendon) Pty Ltd (ACN 167 814 093)  
Petstock (Sunbury) Pty Ltd (ACN 603 307 937)  
Petstock (Kingsford) Pty Ltd (ACN 165 271 189)  
Petstock Tuggerah Pty Ltd (ACN 609 948 503)  
Petstock (Brighton) Pty Ltd (ACN 167 386 487)  
Petstock (Bunbury) Pty Ltd (123 322 805)  
Wandoo Great Pty Ltd (ACN 149 200 439) T/As  
Petstock Midland  
Petstock Holdings Pty Ltd (ACN 614 533 809)  
PSD Rural Pty Ltd (ACN 648 355 113)  
St Arnaud Equity Pty Ltd (ACN 648 750 707)

Petstock Industries Pty Ltd (ACN 613 033 159)  
Petstock Provincial Pty Ltd (ACN 614 040 809)  
Genuine Range Pty Ltd (ACN 604 821 696)  
PS Doggie Daycare Pty Ltd (ACN 633 073 300)  
Petstock Property Pty Ltd (ACN 149 178 094)  
Petstock Holdings Pty Ltd (ACN 614 533 809)  
Petstock NDC Pty Ltd (ACN 639 172 991)  
Petstock Investments Pty Ltd (ACN 634 401 148)  
PHIL Ventures Pty Ltd (ACN 167 481 192)  
PS Centre Of Excellence Pty Ltd (ACN 639 584 357)  
Petspiration Group Pty Ltd (ACN 147 974 409)

