



Modern Slavery Statement

1. Introduction

VetPartners is committed to eradicating modern slavery in all its forms. In December 2024, the Australian Government appointed its first Federal Minister for Slavery, reflecting a strengthened national focus on combating modern slavery. VetPartners supports this leadership and continues to align its efforts with evolving government priorities. This statement, prepared in accordance with the *Modern Slavery Act 2018* (Cth), outlines the actions we have taken during this reporting period to identify, assess, and mitigate modern slavery risks within our business operations and supply chains. We continue to endeavour to improve our risk management framework to uphold ethical sourcing and compliance.

2. Our organisation

This is a joint modern slavery statement covering:

- Morello TopCo Pty Ltd (**Morello**);
- Morello BidCo Pty Ltd;
- Australian Veterinary Owners' League Pty Ltd;
- NVA Australia Parent Pty Ltd;
- NVA Australia Holdings Pty Ltd;
- National Veterinary Care Pty Ltd; and
- VetPartners NVC Pty Ltd,

(each a **Reporting Entity** and together referred to as the **Group, VetPartners, we, our, us**).

3. Our business

VetPartners was established in 2016, beginning as a group of 32 veterinary practices across three Australian states.

Since then, we have grown significantly into a regional clinical network of over 4,500 people, more than 270 veterinary practices across Australia, New Zealand, and Singapore, and a range of affiliated services businesses that support and strengthen our operations. These include veterinary training centres, procurement and buying groups, and other specialised services that enable our practices to operate efficiently and deliver high-quality care to our patients.

VetPartners is supported by dedicated corporate offices in Australia and New Zealand, which provide a comprehensive range of shared services. These include functions such as payroll, finance, IT, legal, risk, compliance, insurance, procurement, leasing, marketing, human resources, recruitment and learning and development.





4. Modern slavery governance

This reporting period, we took clear actions to strengthen oversight and accountability:

- The NVA Board of Directors (**Board**) provided strategic oversight, reviewed progress and approved the Modern Slavery Statement.
- The Legal and Procurement Teams led the development, implementation and enforcement of our modern slavery risk management framework across the Group.
- The VetPartners Executive Leadership Team (**ELT**) drove operational delivery, embedding modern slavery controls and ensuring compliance in day-to-day business activities.

5. Modern slavery action

We remain committed to ensuring there is no modern slavery in our business operations or supply chains.

Our risk management framework enables us to identify, mitigate, monitor, and protect against modern slavery risks.

6. Modern slavery risk management framework

Our framework includes policies, supply chain understanding, due diligence questionnaires, contractual provisions, and whistleblower protections.



a. Policies

Our Modern Slavery Policy commits us to ethical conduct and risk mitigation, reviewed annually and made available to all employees and contractors.



**b. Understanding our supply chains**

In a previous reporting period we consolidated VetPartners and United Veterinary Group (**UVG**) procurement into a single, centralised team. This consolidation improved our ability to map supplier relationships and concentrate our efforts on supply chain segments with the highest modern slavery risk.

We have continued to identify and understand areas where there is limited transparency or where suppliers may have less established governance. This approach allows us to target our risk management activities more effectively, particularly with smaller or regional suppliers that may not yet be fully aligned with modern slavery obligations.

c. Due diligence

Most of our procurement activity is concentrated among top-tier suppliers, who are generally well advanced in their approach to managing modern slavery risks. These suppliers typically operate under established governance frameworks and are subject to their own statutory reporting or equivalent obligations. We have observed that they have integrated modern slavery obligations into their standard terms and conditions, contracts, and internal training programs. As a result, during this reporting period, our attention was directed toward suppliers we assessed as presenting higher modern slavery risk. Typically smaller operators or those with less developed governance structures.

Consistent with government expectations that large entities use their market position to lift industry standards, we engaged constructively with these smaller suppliers to build their awareness and capability to manage modern slavery risks. We view this as an industry best practice.

In addition, we commenced evaluating the use of sophisticated third party paid due diligence platforms to support our risk management efforts, strengthen the consistency, efficiency, and depth of our own approach.

d. Contracts

Modern slavery obligations continue to be embedded in new and renewed supplier contracts managed by the centralised Procurement team with support from the Legal team. These contractual provisions:

- Require suppliers to have modern slavery policies and due diligence programs;
- Mandate reporting of any known or suspected instances of modern slavery, dovetailed into their general obligations to report any breach of any law;
- Allow for auditing and ongoing monitoring.
- Enable us to suspend or terminate agreements if serious concerns arise.

Where suppliers are less mature in this area, we leveraged our commercial influence as a large enterprise to secure their agreement to these provisions. This often included requiring updates to their own terms and conditions, such as publishing a modern slavery commitment





on their website.

e. Protection of Whistleblowers

Our Grievance Complaint Resolution Policy, Whistleblower Policy and Whistleblower Protected Disclosure Procedure remained in place during this reporting period. These provide secure and confidential mechanisms for our community (suppliers, employees and key decision makers) to identify and escalate concerns, including modern slavery.

7. Modern slavery risks

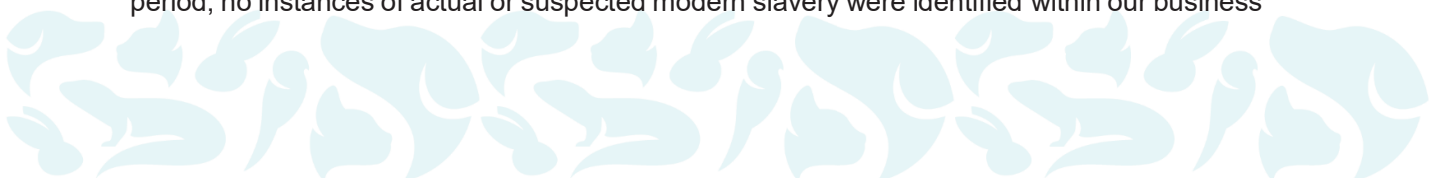
We continue to adopt a targeted, risk-based approach to identifying and assessing modern slavery risks in our operations and supply chains.

We recognise that risks may arise due to the nature of the product or service, the location of production or sourcing, and the type of labour involved.

We consider the following areas of potential modern slavery risks to be the most relevant to our business operations. These risk areas have been identified having regard to industry risk profiles, geographic exposure, and the nature of goods and services procured.

Business Area	Risks Identified
Procurement	- Engagement of contractors, seasonal, migrant, or low-skilled - Sourcing of raw materials and products from high-risk geographical regions
IT	- Use of contractors, seasonal, migrant, or low-skilled workers - Reliance on third-party labour agencies - Procurement of goods and services from high-risk regions - Risk of acquiring products associated with forced labour, particularly IT hardware - Outsourced labour in high-risk regions - Procurement of IT hardware with known forced labour risks.
Property & Construction	- Reliance on migrant and low-skilled labour, increasing the risk of exploitation - Use of third-party labour agencies with limited oversight - Complex and opaque supply chains, often involving lower-tier suppliers in high-risk regions

Based on the risk assessment and due diligence activities undertaken during this reporting period, no instances of actual or suspected modern slavery were identified within our business





operations or supply chains during this reporting period.

8. Remediation program

In prior reporting periods we have reiterated our commitment to remediation action when and if we identify suppliers that perpetrate, or are at high risk of perpetrating modern slavery offences. We remain committed to zero tolerance for modern slavery offences. However, in this reporting period we recognise that immediately terminating supplier relationships may not always result in better outcomes for affected individuals. Our approach prioritises engagement and remediation, particularly with smaller suppliers who may lack resources or awareness.

We encourage improvement by using our commercial position to require policy updates, contractual undertakings, and staff training. In the event of serious breaches or an unwillingness to cooperate, we reserve the right to suspend or terminate the relationship.

9. Assessment of effectiveness of actions

We recognise the importance of assessing the effectiveness of our actions. While we are currently unable to adequately assess the effectiveness of our current measures, this will be addressed in the next reporting period as a result of key performance indicators and targets which were implemented subsequent to the end of this reporting period.

These key performance indicators include the following:

- **training:** participation and completion rates;
- **contracts:** the percentage of modern slavery clauses in contracts with counterparties;
- **risk framework:** reporting of modern slavery risks and identification of priority actions within the Group's established risk framework.

Over the next and subsequent reporting periods, we will be in a position to report on these key performance indicators and continue to review and enhance them to ensure they enable the effectiveness of our actions to be measured and inform our future priorities to manage modern slavery risks in our business.

10. Further steps and priorities

In the year ahead, our priorities will include:

- Refreshing and expanding our training coverage to include a broader range of employees from various support office functions (for example, procurement, people and culture, workplace health and safety) as well as those with responsibility for our clinic network operations.
- Continuing to embed modern slavery risk oversight across business functions.
- Deepening our understanding of high-risk supplier categories.





- Annual review of our Modern Slavery Policy.
- Exploring third-party platforms to automate and strengthen due diligence.
- Reinforcing contractual and website-based obligations for key suppliers.
- Maintaining transparency through internal reporting and governance structures.

Consultation and approval process

This joint modern slavery statement has been prepared by Morello TopCo Pty Ltd in consultation with the other Reporting Entities. This joint statement was approved by the Morello TopCo Pty Ltd Board on 28 May 2026.

Signed by:

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Sinead Ryan

Director, Morello TopCo Pty Ltd

