

Modern slavery statement FY25



Life-changing dog food

Real food. Gently Cooked. Delivered.

lyka

Acknowledgement of country

Lyka acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea, and community. We pay our respects to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

Consultation with entities

This statement was developed under the leadership of Lyka's Sustainability Team, with contributions from a diverse range of stakeholders across the organisation. Input was provided by members of Lyka's internal Sustainability Committee, as well as key representatives from our Supply Chain, People, Safety, Health, Environment, and Quality (SHEQ), and Operations teams. This report was also developed based on engagement with Lyka's suppliers. The draft statement was then shared with the Executive Leadership Team and Board Members for feedback prior to its finalisation.

Statement on reporting entities

Lyka Wellness Pty Ltd (ABN 56 623 082 360) is an Australian proprietary company registered in New South Wales. This modern slavery statement has been prepared and published in accordance with the Modern Slavery Act 2018 (Cth) and outlines the steps taken by Lyka Wellness Pty Ltd trading as Lyka Pet Food (henceforth referred to as "Lyka") to identify, assess, and address modern slavery risks in its operations and supply chains during the reporting period 1 July 2024 to 30 June 2025 (FY25).

Lyka Wellness Pty Ltd is the sole reporting entity for the purposes of this statement. The statement reflects Lyka's commitment to ethical and responsible business practices and has been approved by its principal governing body and signed by a responsible member of the organisation.

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References to Modern Slavery Act criteria

Modern Slavery Act criteria	Reference in report
Identify reporting entity	Page 2
Describe the reporting entity's structure, operations and supply chains	Pages 10-14
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 15-29
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Pages 30-42
Describe how the reporting entity assesses the effectiveness of these actions	Pages 43-47
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 48
Provide any other relevant information	Page 49

Since founding Lyka in 2018, we've delivered almost 100 million meals to Australian dogs, building Australia's leading real dog food brand on a foundation of quality, transparency, and care. Our growth has been remarkable, but what I'm most proud of is how we've grown. Lyka is the only pet food company with negative emissions of carbon and single-use plastic across scopes 1, 2, and 3. In 2023, we achieved B Corp certification, and in 2024, we were honoured to receive the Telstra Best of Business Promoting Sustainability Award. These recognitions reflect something fundamental to who we are: our belief that building a great business means doing right by our dogs, our people, and our planet.

At Lyka, we live by our values every day. One of our core principles is to "pick up the poo," which means always doing the right thing, acting with integrity, and taking responsibility. This commitment extends far beyond our own operations, encompassing everyone in our supply chain – from the farmers who grow our ingredients to the drivers delivering our meals to customers. We believe that ensuring dignity, safety, and fair treatment throughout our entire supply chain isn't just the right thing to do – it's fundamental to who we are.

Globally, the challenge is urgent. The International Labour Organization has found that illegal profits from forced labour have risen by 37% since 2014.¹ Conflict continues to exacerbate human rights risks in supply chains worldwide. These aren't abstract statistics to us. They represent real people whose rights and wellbeing we have a responsibility to protect.

This is Lyka's first modern slavery statement, and while we're setting up the infrastructure for continued development, we're building on strong foundations. We source at least 85% of our ingredients from Australian producers, which not only reduces our environmental impact, but also provides us with greater visibility and control over our supply chain. Our HACCP-certified manufacturing facilities in Sydney and Melbourne operate with strict safety protocols, giving us direct oversight of working conditions within our operations. We work exclusively with ethical and sustainable suppliers who share our values, and we maintain close relationships that enable transparency and accountability.

Our B Corp certification reflects this commitment to ethical practices across every aspect of our business. By keeping our supply chain predominantly local,



we can ensure better working conditions and fair labour practices while supporting the Australian economy. We've begun comprehensive mapping of our supply chain to identify and assess modern slavery risks, with a particular focus on our ingredient sourcing where we maintain direct supplier relationships.

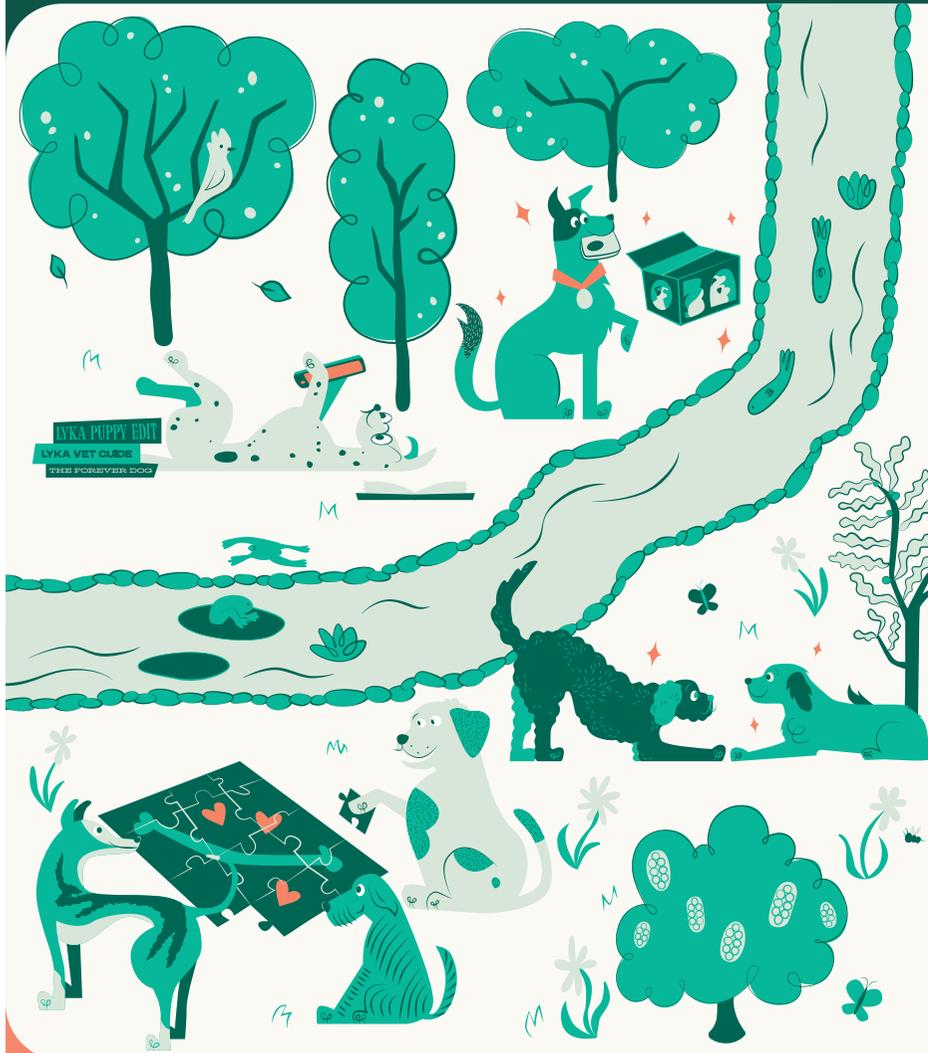
We recognise that addressing modern slavery requires ongoing commitment and continuous improvement. This first statement marks the beginning of a journey, not the end. We're establishing robust infrastructure for long-term risk management, including supplier assessment frameworks, due diligence and auditing processes, and internal training programs. Our goal is to build a system that doesn't just identify risks, but actively works to prevent and remediate any potential instances of modern slavery in our operations and supply chain. As we continue to grow, this commitment will only deepen – guided by the same integrity and care that shape everything we do.

ANNA PODOLSKY
Chief Executive Officer

¹ International Labour Organization (2024) Profits and Poverty: The Economics of Forced Labour. 2nd edn. Geneva: International Labour Office. doi: [10.54394/IJJE9035](https://doi.org/10.54394/IJJE9035).

Lyka's mission and values

Pups are our purpose



Equals at the dog park

Pick up the poo



Lead the pack

The products we sell

Lyka offers a subscription-based range of fresh pet food products designed to improve dog health through wholefood nutrition.

Our product lineup includes fresh, gently cooked meals, natural treats, and human-grade supplements.

The meal range features multiple protein options, including beef, chicken, goat, kangaroo, lamb, and turkey, all formulated by Board Certified Veterinary Nutritionists to meet Association of American Feed Control Officials (AAFCO) and European Pet Food Industry Federation (FEDIAF) standards.

As the only pet food company producing gently cooked, human-grade recipes at scale in Australia, Lyka delivers complete and balanced nutrition directly to customers' doors, supporting dogs through better digestion and nutrient absorption.



Our structure, operations, and supply chain

Our structure

Lyka, founded in 2018, has become Australia's leading dog food company, specialising in human-grade, nutritionally complete, and balanced meals.

We pride ourselves on creating healthy pet food developed by Board Certified Veterinary Nutritionists and gently cooking it in Australian kitchens across New South Wales and Victoria.

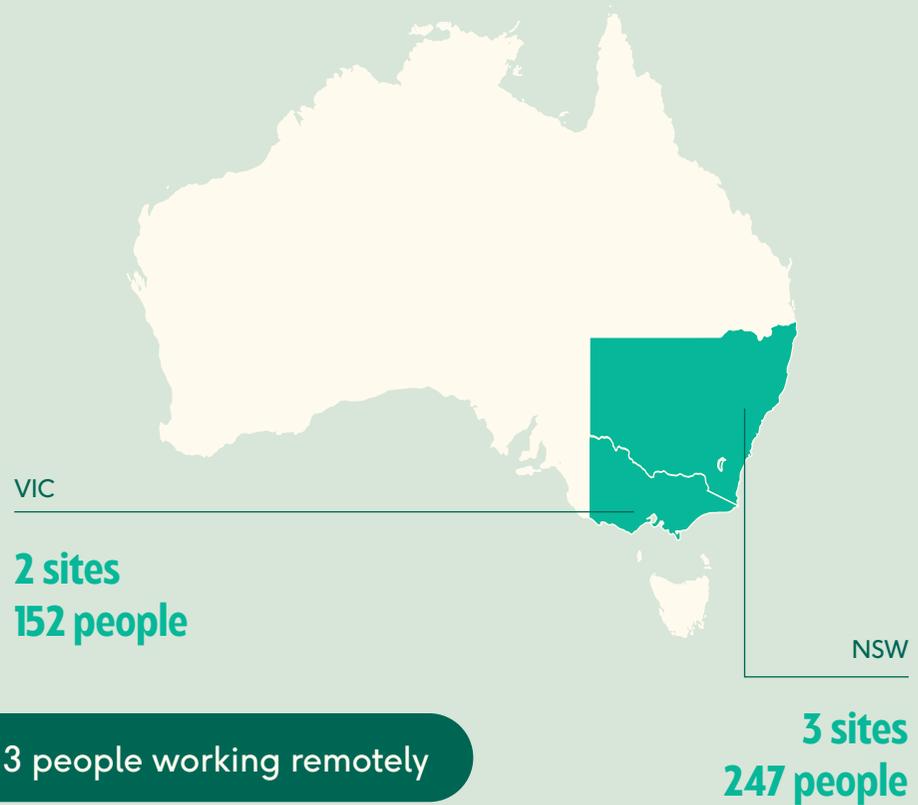
We provide a comprehensive offering through our direct-to-consumer model, delivering fresh meals, treats, and supplements directly to pet families across Australia. Our customer-first focus has enabled us to redefine convenience for pet parents through a seamless online experience, personalised nutrition plans, fast delivery, and expert veterinary advice – ensuring happy, healthy pets.

At Lyka, we see ourselves as changemakers in the pet nutrition space. Our mission extends beyond food, taking a preventative and holistic approach to pet wellbeing. This includes education, scientific collaborations, and partnerships that drive meaningful impact so pets can live healthier, fuller lives.

Lyka is a Certified B Corporation, which means that we hold ourselves to the highest standards of social and environmental performance, transparency, and accountability. Protecting human rights remains a high priority for our organisation, and we continue to strive for progress across our social and environmental initiatives.

Employees & major sites

Lyka has **303 employees** and **99 contractors** employed across **5 key sites** in Australia.



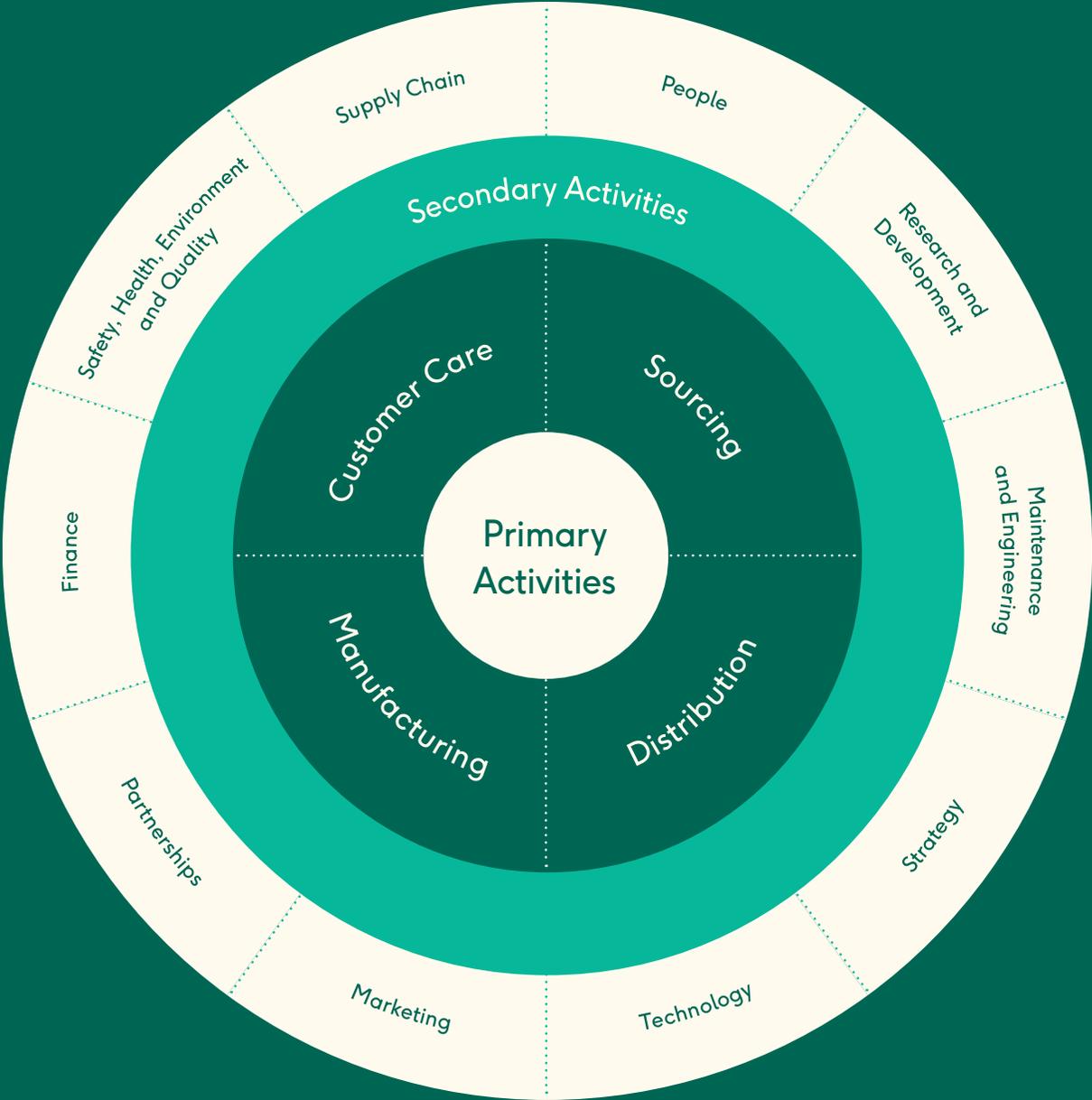
Our operations

Lyka Pet Food drives a vertically-integrated operational structure to ensure we provide a seamless experience for our customers and deliver high-quality, nutritious meals.

Everything we do at Lyka is designed to fulfil our core purpose – enabling every pet to live full of life.

Over recent years, Lyka has significantly expanded its operational capabilities to improve the care we provide to pets and their families.

This includes proprietary manufacturing systems, strict quality control frameworks, and a diverse range of real meals, treats, and supplements tailored to the unique nutritional needs of different dogs. Lyka’s operations are organised around primary activities, which directly deliver value to customers, and secondary activities, which support these core functions.





Our primary activities start with responsible sourcing, collaborating with trusted suppliers to secure high-quality, human-grade ingredients.

We prioritise local procurement wherever possible, with at least 85% of our recipe ingredients by weight sourced within Australia. Manufacturing takes place in New South Wales and Victoria kitchens under the Lyka Operations Management System (LOMS), ensuring consistent, safe, and high-quality production. Our distribution network delivers fresh products directly to pet families nationwide. The Customer Care Team complements these efforts by providing personalised nutrition guidance and expert veterinary advice to ensure optimal pet health and customer satisfaction.

Supporting these primary activities are a range of secondary functions that uphold our operational excellence. Our Safety, Health, Environment and Quality (SHEQ) Team governs all operations to ensure safe, ethical, and compliant practices. The Research and Development (R&D) Team drives innovation in pet nutrition, working with Board Certified Veterinary Nutritionists and leading universities in Australia and abroad to create scientifically formulated, complete, and balanced meals.

Additional supporting functions include Finance, which manages financial governance, budgeting, and accounting; Marketing, which drives brand awareness and customer engagement; and Partnerships, which facilitate collaboration and innovation with key external stakeholders. Our Technology Team maintains digital platforms, leverages data analytics to optimise operations, and safeguards customer and stakeholder information through robust cybersecurity measures. Finally, our Strategy Team identifies opportunities and sets strategic direction to support Lyka's continued growth and long-term success.

This integrated operational structure enables Lyka to deliver exceptional products and services while upholding the highest standards of ethical conduct, transparency, and accountability across our entire value chain.

Our supply chain

In the 2024 to 2025 financial year, Lyka worked directly with 1,371 suppliers, of which around 97% are based in Australia.

This reflects our commitment to supporting local businesses and maintaining a domestic supply base. These suppliers cover a wide range of categories, including ingredient sourcing, packaging, logistics, and professional services. We prioritise suppliers who demonstrate strong social and environmental responsibility.

We recognise that our supply chain extends beyond our direct suppliers. Further upstream, thousands of additional entities provide goods and services to our suppliers, known as tier 2 and tier 3 suppliers. Tier 2 suppliers provide goods or services to our direct suppliers. Beyond this, tier 3 suppliers refer to those who supply goods or services to tier 2 suppliers. As suppliers are further removed from Lyka, visibility and influence diminish, which makes identifying and managing modern slavery risks more complex.

Like many companies, gaining transparency across these extended supply chains is challenging, as we do not have direct relationships with many of these organisations. Nonetheless, we remain committed to improving visibility and traceability to better identify and address potential modern slavery risks, whether we may cause, contribute to, or be directly linked to them.

Throughout this statement, 'suppliers' refers to organisations from which Lyka has purchased goods or services, and 'sites' refers to the physical facilities these suppliers use to deliver goods and services to Lyka.



Supply chain: product inputs

Product input suppliers are defined as those who provide Lyka with goods directly incorporated into the finished products delivered to our customers. These suppliers are managed by our Procurement Team in collaboration with our Sustainability, Research and Development, and Quality teams, to ensure all product inputs meet our standards for nutritional integrity and food safety.

The top three product input categories by spend are meat (approximately 60%), packaging (approximately 15%), and vegetables (approximately 12%). Around 99% of our product inputs are sourced from Australian suppliers and distributors, with the remaining 1% sourced from China, primarily for specific packaging components. All meat products used in our recipes are sourced exclusively from Australia and New Zealand.

Lyka recognises that our supply chain goes beyond our direct suppliers. Many of them source raw materials from international vendors further upstream, with at most 15% of our raw ingredients by weight originating overseas. These upstream suppliers are classified as tier 2 suppliers and beyond. As part of our commitment to ethical sourcing, we aim to increase visibility into these extended tiers to better identify and address potential modern slavery risks.

Supply chain: supporting products and services

Our supporting products and services help keep Lyka running day-to-day. They provide the tools, systems and services that support our internal operations and business functions. These suppliers work across different teams and are onboarded based on business needs, following background checks to ensure they meet our standards and align with how we operate.

The top 3 categories by spend in this area are Information Technology (approximately 34%), People and Employee Activities (approximately 21%), and Freight and Logistics (approximately 18%). Many of these suppliers operate globally. For reporting, supplier location is based on the country where payments are made. Our top 3 supplier locations by spend are Australia (74%), Ireland (25%), and the United States (1%).

We know that supporting products and services generally pose a lower risk of modern slavery. This is because they involve fewer people and less manual or low-skilled labour, where risks are more likely to occur. These suppliers are still included in our overall risk assessment, but we don't prioritise them for deeper supply chain visibility beyond tier one. Instead, we focus our efforts on higher-risk areas of the supply chain, outlined in the next section.

The following defines the suppliers within Lyka's scope for responsible sourcing, grouped by severity and likelihood of modern slavery in their operations.

In-scope suppliers for Lyka's responsible sourcing programme

Direct suppliers: tier 1

Product inputs

- Red meats, poultry, and seafood
- Vegetables, fruit, and other agricultural products
- Oils, vitamins, and minerals
- Packaging

Supporting products and services

- High risk services, which include freight and logistics, repair and maintenance, cleaning, and labour hire
- High risk products for operational use, including production equipment, uniforms, and capital expenditure

Indirect suppliers: tier 2 and beyond

Product inputs

Higher risk commodities and subcontracted services to deliver goods, including (but not limited to) seafood, packaging inputs, and ingredients procured from other countries beyond our tier 1 suppliers

Supporting products and services

Higher risk component parts and subcontracted services, including (but not limited to) machinery parts, chemical manufacturers, and supplier subcontractors

How Lyka has assessed modern slavery risks in its operations and supply chain

The Modern Slavery Act 2018 highlights 8 types of serious exploitations¹, which Lyka has categorised based on how salient they are in our value chain.

Most salient modern slavery issues in Lyka's value chain

Forced labour:

A situation in which a person (victim) provides labour or services because of coercion, threat, or deception, and a reasonable person in their position would not consider themselves free to stop providing that labour or services, or to leave the place or area where they provide it.

Debt bondage:

A situation where a person is working to repay a (real or perceived) debt that is excessive or impossible to repay, resulting in exploitation.

Deceptive recruiting for labour or services:

A recruiter engages in conduct intending to induce another person to provide labour or services, using deception about the nature of the work, the conditions, the pay, or other relevant features.

Other relevant modern slavery issues in Lyka's value chain

Worst forms of child labour:

Situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Trafficking in persons:

Recruiting, moving, receiving, harbouring, or transporting a person for the purpose of exploiting them.

Likely not salient in Lyka's value chain

Forced marriage:

A marriage in which one party (the victim) enters without freely and fully consenting, due to coercion, threats, or deception.

Slavery:

The condition of a person over whom any or all of the powers attaching to the right of ownership are exercised; this condition may result from a debt or contract made by the person.

Servitude:

A condition where a person is forced, through coercion, threat, or deception, to provide labour or services, is not free to stop or leave, and is significantly deprived of personal freedom beyond their work.

¹ Reference: Modern Slavery Act 2018 (Cth) s.4; Australian Government, Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, 2023.

Resources used to assess modern slavery risks

To identify our most important modern slavery risks, Lyka drew on the following tools and insights. These resources helped us create risk profiles for different commodities and services, giving a clear picture of the key risks across both our internal operations and supply chain.

Tools and insights category	Example resources used	Lyka's approach
International & intergovernmental standards and data	<ul style="list-style-type: none"> • ILO Global Estimates on Forced & Child Labour • UNICEF Child Labour Data • UN Guiding Principles on Business and Human Rights (UNGPs) • OECD Guidelines for Multinational Enterprises • US Department of Labor's List of Goods Produced by Child Labour/ Forced Labour 	Lyka draws on internationally recognised standards and datasets to inform its understanding of modern slavery risks. These sources provide guidance, definitions, and data from organisations such as the ILO, UNICEF, the OECD, the UN, and the US Department of Labor. They help identify high-risk countries and commodities, and outline principles for responsible business conduct.
Government & regulatory guidance	<ul style="list-style-type: none"> • Australian Modern Slavery Act Guidance 	Lyka also relies on government and regulatory publications that outline legal and compliance expectations for identifying and managing modern slavery risks.
NGO & civil society reports	<ul style="list-style-type: none"> • Walk Free Global Slavery Index • Verité reports • KnowTheChain benchmarks • Anti-Slavery International reports 	Independent research from non-governmental organisations (NGOs) and civil society bodies provides Lyka with detailed modern slavery risk profiles for specific industries geographics.
Tools to assess responsible sourcing mechanisms	<ul style="list-style-type: none"> • Responsible Sourcing Tool • Sedex Radar assessment tool • Sedex Self-Assessment Questionnaires (SAQ) • Sedex SMETA Audit 	Lyka uses sector-specific tools and platforms to evaluate suppliers and their sites, determining both their inherent risk and site-specific risks based on their practices.
Internal resources & data	<ul style="list-style-type: none"> • Collaboration with internal teams who work closely with suppliers • Direct dialogue with suppliers • Worker grievance mechanisms • Internal finance and supply chain reports 	Lyka draws on internal systems and processes to identify and address modern slavery risks. These provide real insights into supplier practices and ensure any identified risks are addressed promptly and effectively within our operations and value chain.



Lyka's relationship to potential modern slavery risks

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), Lyka has considered how its activities and business relationships may be connected to modern slavery risks. These connections can occur where a business may cause, contribute to, or be directly linked to modern slavery through its operations or supply chain.

Cause

A business may cause modern slavery where its own actions directly result in exploitation.

Lyka considers it very unlikely that our activities cause modern slavery. We operate exclusively within Australia and comply with all relevant workplace, recruitment, and health and safety laws. Our internal employment practices and policies prohibit exploitative behaviour, including excessive recruitment fees, restrictions on worker movement, and the engagement of underage workers.

Contribute to

Contribution risks arise when a company's decisions incentivise suppliers or partners to rely on exploitative labour models.

- ✓ **Procurement and pricing practices:** Placing unrealistic cost or delivery expectations on suppliers can increase the risk of forced labour or debt bondage.
- ✓ **Use of labour hire firms:** Knowingly relying on providers that charge recruitment fees, retain worker identity documents, or use coercive contracts could contribute to debt bondage, deceptive recruitment, or trafficking in persons.
- ✓ **Outsourced services:** Applying time or cost pressures on third-party service providers (e.g., cleaning, maintenance, logistics partners) can contribute to exploitative labour models, including forced labour or trafficking in persons.

Lyka mitigates these risks through responsible procurement and supplier engagement. Where possible, Lyka directly employs individuals in higher-risk service areas such as cleaning and maintenance. This approach reduces exposure to modern slavery risks and supports fair, transparent working conditions.

Directly linked to

Direct linkage refers to situations where Lyka's operations, products, or services are connected to modern slavery risks through a business relationship, even if Lyka does not directly cause or contribute to the harm.



Meat and protein supply:

Proteins sourced in Australia make up a significant portion of Lyka's procured goods. While Australia has strong labour laws, research and enforcement activities have identified instances of forced labour and the exploitation of migrant workers in farming and meat processing. Lyka recognises these risks as relevant to the broader sector.



Global freight and logistics partners:

Lyka works with domestic and international logistics providers, including third-party cold chain couriers. Freight and logistics are globally recognised as sectors with risks of trafficking in persons, forced labour, and debt bondage, especially where subcontracting chains are long and oversight is limited. Lyka has mitigated some of these risks, with 99% of direct logistics partners (by spend) operating within Australia.



Packaging supply chain:

Lyka sources packaging materials globally, including bioplastics, paper, and aluminium. Much of the global packaging supply chain traces back to China, which has been identified in international reporting as a higher-risk geography for forced and state-imposed labour particularly in manufacturing. While Lyka's direct suppliers do not operate in higher risk regions within China, further visibility into our tier 2 and beyond suppliers is needed to remove reasonable doubt. Lyka continues to engage with suppliers to promote responsible practices.



Horticulture:

Most of Lyka's vegetables are procured from within Australia. The Australian horticulture sector has been associated with risks of debt bondage, deceptive recruitment, and forced labour – particularly affecting migrant workers on temporary visas. Lyka acknowledges these risks, even though it does not directly employ such workers.



Vitamins and minerals:

Vitamins and minerals represent a small proportion of our supply chain but involve complex global sourcing. Risks in this sector include child labour in mining and forced labour in mineral extraction and processing. These risks are challenging to trace given the global and multi-tiered nature of raw material sourcing.



Miscellaneous procured products:

Certain low-volume, high-processing items (e.g., uniforms, gloves, machinery components) are sourced through complex supply chains with limited visibility. These product categories are globally recognised as associated with risks of forced labour or child labour in textiles, footwear, and electronics manufacturing.

Further detail on modern slavery risks directly linked to Lyka's operations can be found in the Supply Chain Risks Section on page 21.

Operational risks

Lyka recognises that while the risk of modern slavery within its direct operations is comparatively low, it is not negligible if not actively managed.

As a rapidly growing Australian business with warehousing, logistics, and customer service functions, Lyka is committed to proactively identifying and mitigating any potential risks of exploitation, coercion, or unfair labour practices.

Lyka complies with all relevant Australian labour laws and modern slavery legislation, and places strong emphasis on workplace safety and ethical employment practices. These principles are embedded in our governance frameworks, policies and daily practices to prevent any instances of modern slavery within our own operations.

Key operational areas assessed for modern slavery risks include both direct and indirect functions.

Lyka is always looking to proactively identify modern slavery risks. Our internal risk mitigation measures are highlighted in page 30.

Direct



Recruitment and employment practices

Lyka oversees recruitment and employment contracts directly. Risks may arise if onboarding lacks transparency, especially for casual roles. We follow Fair Work policies and diligently monitor working rights to minimise any modern slavery risk.



Workplace culture and grievance mechanisms

Without accessible grievance channels or awareness of worker rights, exploitation can go unreported. Lyka fosters a culture of transparency and respect, supported by clear policies, resources, and training that help employees to manage their rights.

Indirect



Labour hire and casual workforce

Lyka occasionally uses third-party labour hire firms to support manufacturing, warehousing and distribution. These arrangements may carry elevated risks if not properly managed, particularly around wages, working conditions, and visa status of workers. Lyka ensures all providers comply with Fair Work policies and standards.



Cleaning and facilities services

Outsourced cleaning services, often staffed by migrant or temporary workers, are considered higher-risk for indicators of modern slavery such as underpayment, excessive hours, and limited employment protections. Lyka checks for compliance with Fair Work policies and practices for these organisations.

Supply chain risks

Lyka has drawn on a range of resources to assess the key modern slavery risks within our supply chain (see page 17). Risks are evaluated on a supplier-by-supplier basis, considering the type of products or services provided and the geographic context in which they operate.

We are committed to continually strengthening this process to build a deeper understanding of long-term risks. Further oversight is needed to achieve full visibility of modern slavery risks across all suppliers in scope, and maintaining this focus will remain a priority in the next financial year.

Supply chain risk assessment framework

The following framework has been applied to define the presence and extent of modern slavery risks within our supply chain.

Inherent risks

Risks that exist due to external factors, independent of management actions.

- **Geographic risk:** The level of risk associated with the location of supplier facilities or worksites, including regional regulatory environments, labour practices, and socio-economic conditions.
- **Sector risk:** The level of risk linked to the type of product or service provided and the workforce characteristics within that industry sector.

Business risks

Risks influenced by the way an organisation operates and manages its workforce and supply chain.

- **Site characteristic risk:** The extent to which a supplier's site profile may create conditions conducive to modern slavery (e.g., labour standards, worker health, and safety on site). This includes the type, size, and nature of the business and workforce, and how these factors might give rise to ethical issues.
- **Management control risk:** The degree to which a supplier has effective organisational controls in place, such as ethical standards, policies, and compliance systems, to prevent and reduce modern slavery risks. It describes whether management has the right systems in place to prevent, detect, and correct issues related to labour, health and safety, environment, and business ethics.

These categories form the basis of the risk assessment matrix.

Risk assessment matrix

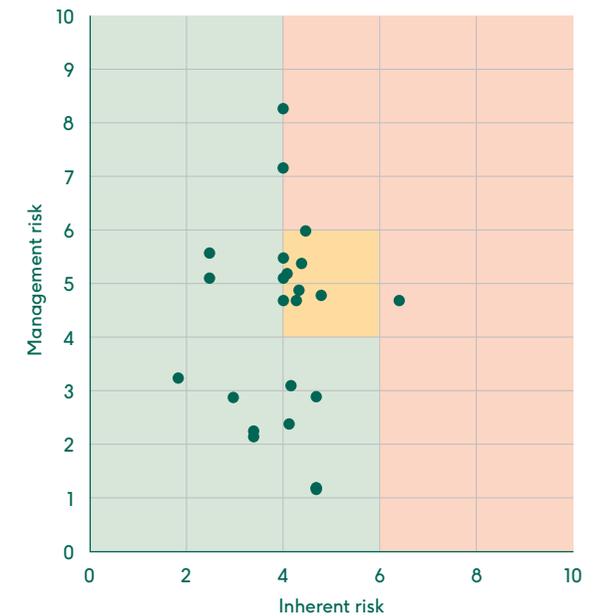
		Inherent risk		
		Low	Moderate	High
Site characteristics and management control risks	Low	Low	Low	High
	Moderate	Low	Medium	High
	High	Low	High	High

Each in-scope supplier that provided sufficient information was assessed against this risk profile. In-scope suppliers were defined as tier 1 suppliers with direct spend of over \$100,000 in industries identified as higher risk for modern slavery (see page 14). The scoping process is explained in more detail further on in this statement (see page 23-25).

A total of 92 suppliers were initially assessed for inherent risk, of which 42 fell within the defined scope. Approximately, 74% of these 42 suppliers completed a self-assessment questionnaire via our partner platform, Sedex. The questionnaire provided information on management practices at an organisation level, as well as site-specific details. Data from 25 tier 1 supplier sites was considered sufficient to be included in the final assessment of the above framework. It should be noted that one supplier can have multiple sites.

Suppliers categorised as “medium” or “high” risk will be prioritised for further assessment and audit due to their elevated potential exposure to modern slavery risks. One supplier with sufficient data falls into the “high” risk category, while 12 others are classified as “medium” risk, including those bordering “high” risk territory. These sites will be the focus of collaborative efforts to ensure that appropriate policies, practices, and processes are in place to assess, remediate, and prevent modern slavery practices.

Total modern slavery supplier risk (tier 1)



At present, this assessment applies only to tier 1 suppliers within scope, where Lyka has the greatest oversight of site characteristics and management control practices. Over time, we aim to extend this visibility to additional tier 1 suppliers and further into lower tiers of the supply chain, particularly for products and services associated with higher inherent risk. We also plan to improve the quality of information provided by suppliers who have previously completed modern slavery questionnaires.

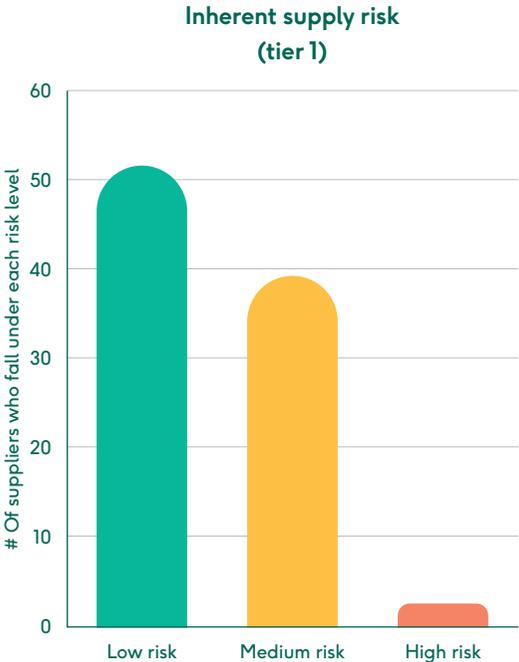
Inherent risks for tier 1 suppliers

Through our partnership with Sedex, we have applied the Sedex Radar Assessment to identify inherent risks among our tier 1 suppliers with annual spend over \$100,000.

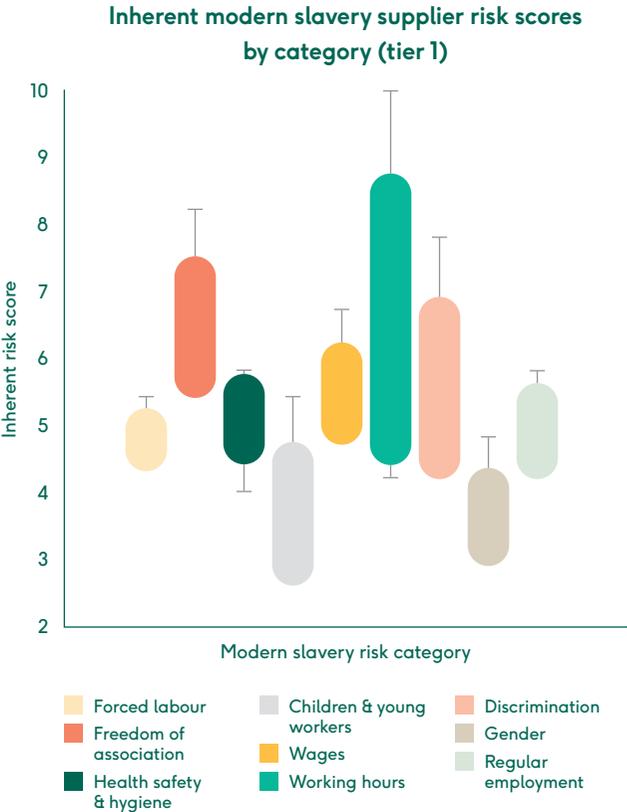
These suppliers account for more than 90% of our total supplier spend, and include 92 suppliers. Sedex uses the following tiering and scoring system to determine risk levels:

- **Low risk:** 0–3.9
- **Medium risk:** 4–5.9
- **High risk:** 6–10

This process helps us identify which suppliers should be prioritised for further assessment of on-site risks and management controls. 3 suppliers were identified as high inherent risk; all are based in China and operate in the manufacturing and logistics sectors. The remaining direct suppliers are either located in Australia or operate in sectors with inherently lower risk profiles (e.g., technology). Suppliers assessed as low inherent risk have been excluded from further review, given the limited salience of modern slavery issues within their value chains.



The Sedex Radar Assessment looks at 9 categories of potential risk factors contributing to modern slavery. Within our value chain, forced labour and freedom of association scored highest on average risk. Lyka will focus on assessing forced labour first, given its strong link to modern slavery practices. Other suppliers with higher scores in areas like child and young workers, working hours, and regular employment will also be reviewed. We recognise that our industry carries a higher risk of modern slavery.



In line with the UNGPs and ILO standards, Lyka will take on a proportionate, risk-based approach. We'll focus our efforts on suppliers with the highest risk, carrying out deeper checks, closer engagement, and remediation where needed. Medium-risk suppliers will continue to be monitored, while low-risk suppliers will initially be less intensely reviewed, so we can direct resources where they have the most impact.

Site characteristic risks and management control effectiveness for tier 1 suppliers

We assess site characteristic and management control risks using audit reports and self-assessment questionnaires provided by suppliers through the Sedex platform.

Of the 91 suppliers with significant spend, 42 were categorised as either high or medium risk and therefore brought into scope for further assessment. Within this group, 31 suppliers have completed a self-assessment questionnaire and registered as Sedex supplier members. This gives Lyka better visibility of site-specific operations and management practices, helping us evaluate the controls in place to reduce modern slavery risks.

Sedex uses the following scoring system to determine site characteristic risk for a supplier site:

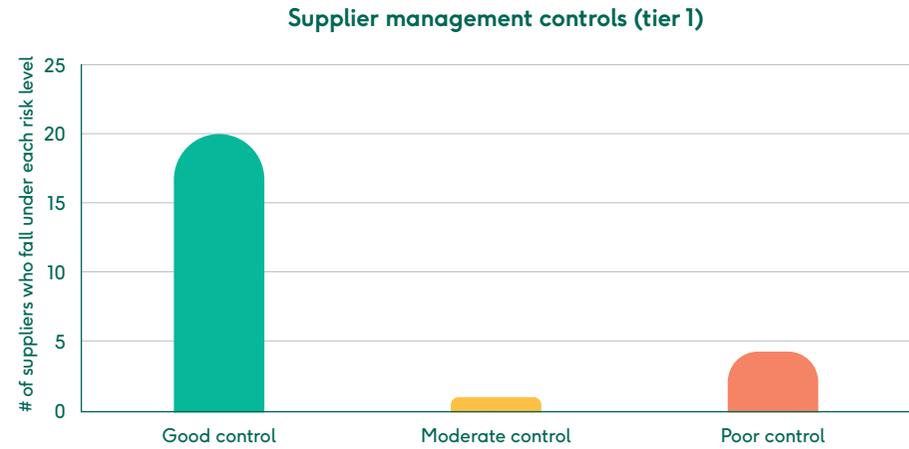
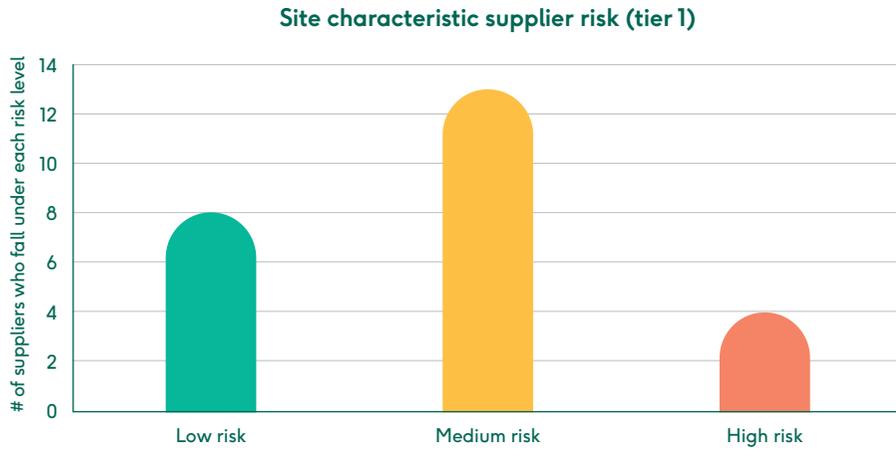
- **Low risk:** 0–3.9
- **Medium risk:** 4–5.9
- **High risk:** 6–10

The assessment results show that the average supplier site has medium-risk characteristics. The most common major and critical risks include unsafe or unhygienic working conditions, which may indicate exploitation and violations of basic labour rights. The ILO recognises such conditions as forced labour.

Other significant risks involve recruitment and worker entitlement, where workers may be charged recruitment fees, denied legal entitlements, or have restricted freedom of movement. These practices can trap workers in dependency or debt bondage, increasing the risk of modern slavery.

Excessive working hours are another key risk. When workers are required to work beyond legal or safe limits, often without adequate compensation or rest, it can indicate coercion and a lack of choice – both central parts of forced labour. Long hours also increase health and safety risks, reinforcing patterns of exploitation.

Lyka will continue working with suppliers to understand and address non-compliance data among our tier 1 suppliers, prioritising critical and major areas first. Our long-term goal is to strengthen supplier capability and foster a culture of continuous improvement, so that risks of modern slavery are systematically reduced and workers' rights are protected across our supply chain.



The management control assessment within Sedex uses a slightly different scoring system:

- **Poor control:** 0–1.9
- **Moderate control:** 2–2.9
- **Good control:** 3–5

Overall, suppliers who provided enough information scored “good” for health and safety and business ethics, suggesting they have adequate policies and processes in place.

However, scores for labour standards averaged “moderate.” Weaknesses in labour controls may expose workers to risks such as illegal recruitment fees, coercive contracts, or denial of entitlements; all of which are key indicators of forced labour and debt bondage.

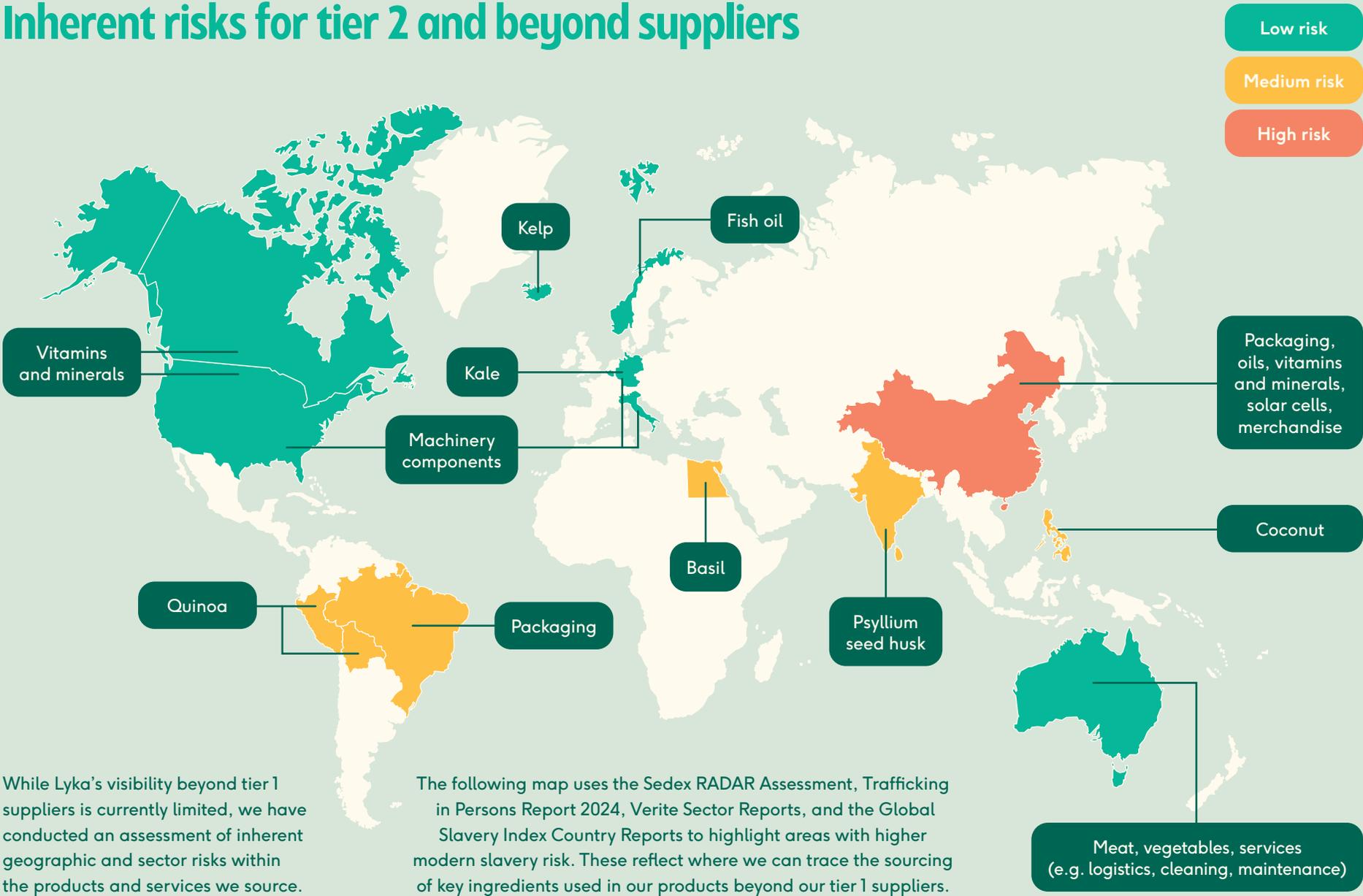
Lyka will prioritise suppliers categorised as “poor control” to review and strengthen their labour standards policies and processes. This includes improving recruitment practices, ensuring fair employment terms, and establishing stronger monitoring systems to better prevent modern slavery risks.

A large proportion of Lyka's tier 1 suppliers are already onboarded onto Sedex, and work is underway to bring the remaining significant tier 1 suppliers onto the platform.

Looking ahead, we plan to expand site risk and management control oversight to tier 2 suppliers, particularly those with higher inherent modern slavery risk.

Our goal is to build a robust and thorough modern slavery program that improves due diligence, supports remediation, and fosters collaboration with suppliers to reduce, and ultimately prevent, modern slavery risks across our supply chain.

Inherent risks for tier 2 and beyond suppliers



While Lyka’s visibility beyond tier 1 suppliers is currently limited, we have conducted an assessment of inherent geographic and sector risks within the products and services we source.

The following map uses the Sedex RADAR Assessment, Trafficking in Persons Report 2024, Verite Sector Reports, and the Global Slavery Index Country Reports to highlight areas with higher modern slavery risk. These reflect where we can trace the sourcing of key ingredients used in our products beyond our tier 1 suppliers.

While Lyka has no evidence of modern slavery occurring within our supply chain, we recognise that certain risks do exist. The following sections outline some of the areas where these risks are highest.

Agricultural products

Although Lyka's meat and vegetable suppliers are based in Australia, agricultural and meat-processing supply chains here still carry modern slavery risks. According to the ILO Global Estimates on Forced Labour, "Agriculture, forestry and fishing accounts for 13% of all adult forced labour exploitation worldwide, or 2.1 million people."¹ Migrant and seasonal workers are particularly exposed. The Australian Parliamentary Inquiry into Temporary Migration noted that "exploitation of temporary visa holders is widespread, including underpayment, unsafe working conditions, and debt bondage through labour hire intermediaries."² Furthermore, meat processing facilities have been flagged as sites where modern slavery vulnerabilities are present.³ These findings show that even in relatively low-risk jurisdictions, agriculture carries systemic vulnerabilities linked to modern slavery.

Packaging

Lyka's sustainable meal packaging in FY24 was derived from Brazilian-grown sugarcane. In Brazil, sugarcane production is specifically listed in the US Department of Labour's lists of goods produced by child or forced labour.⁴ Investigations have shown systemic abuse in the sector: "Brazil's sugarcane industry has long relied on migrant labour working under debt bondage, excessive working hours, and unsafe conditions."⁵ Many of Lyka's packaging components can also be traced back to China. In China, manufacturing sectors such as plastics and paper face systemic forced labour risks, with credible reports highlighting the use of state-imposed forced labour of Uyghurs and other minority groups in factories across multiple industries, including packaging.⁶

Fisheries and aquaculture

While Australian regulation greatly reduces risks compared to global seafood supply chains, fishing and aquaculture remain flagged sectors. The Walk Free Global Slavery Index notes that "migrant workers on fishing vessels are particularly at risk of debt bondage, deceptive recruitment, and physical abuse."⁷ Although Lyka sources wild-caught seafood domestically, vulnerabilities may still exist if migrant crews or contracted labour are used in processing or vessel operations. Ongoing due diligence is needed to confirm crew contracts, hours, and working conditions.

1 International Labour Organization (2022) *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*. Geneva: International Labour Office. doi: 10.54394/JJJE9035.

2 Parliament of Australia, Select Committee on Temporary Migration (2021) *Temporary Migration: Final Report of the Select Committee on Temporary Migration* (Senate), Canberra: Commonwealth of Australia.

3 Walk Free (2023) *Global Slavery Index 2023: Modern Slavery in Australia (Country Study)*. Perth: Minderoo Foundation. Available at: <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

4 U.S. Department of Labor, Bureau of International Labor Affairs (2024) *List of Goods Produced by Child Labor or Forced Labor*. Washington, DC: U.S. Department of Labor. Available at: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

5 Teixeira, F. and Sherfinski, D. (2021) 'Ethanol: Brazil's sugar-based biofuel built on labor abuse', *Context*, 16 November. Available at: <https://www.context.news/money-power-people/long-read/ethanol-brazils-sugar-based-biofuel-built-on-labor-abuse>

6 U.S. Department of Labor, Bureau of International Labor Affairs (2024) *List of Goods Produced by Child Labor or Forced Labor*. Washington, DC: U.S. Department of Labor. Available at: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>; Walk Free (2023) *Global Slavery Index 2023: Modern Slavery in China (Country Study)*. Perth: Minderoo Foundation. Available at: <https://cdn.walkfree.org/content/uploads/2023/11/14130723/gsi-country-study-china.pdf> (Accessed: 28 October 2025).

7 Walk Free (2023) 'Forced labour at sea', *Global Slavery Index 2023: Spotlights*. Available at: <https://www.walkfree.org/global-slavery-index/findings/spotlights/forced-labour-at-sea/>

Solar panel cells

While solar represents a small part of Lyka’s purchased goods and services, its supply chains carry some of the highest global risks due to geographic concentration. The International Energy Agency (IEA) reports that “China has more than 80% of global manufacturing capacity at every stage of solar panel production.”⁸ Further, the US Department of Labor’s List of Goods Produced by Child Labor or Forced Labor identifies “polysilicon in China” as being produced with forced labour.⁹ Multiple independent reports also document systemic use of state-imposed forced labour among Uyghur and other Turkic minorities in Xinjiang’s solar manufacturing sector.¹⁰ Given that Lyka has likely procured solar cells from China, this creates a high inherent risk unless the source can be independently verified.

Cleaning and labour hire

Cleaning, facilities services, and labour-hire/ contract work are recognised high-risk areas for modern slavery. These roles are often outsourced, subcontracted, and depend heavily on low-paid, migrant or agency workers with weak contractual protections.¹¹ Workers frequently lack access to grievance mechanisms and can be exposed to wage deductions, excessive hours or retention of identity documents, which are all indicators of forced labour. For site services (cleaning, maintenance, logistics), audit and contract controls are essential. Lyka only contracts these workers in Australia, where stricter regulations ensure payment of business awards, as well as adequate shift loading. Even so, we continue to conduct thorough due diligence on suppliers in this sector.

Coconut

Coconut production and processing, common in parts of South and Southeast Asia, often relies on smallholder farming, seasonal harvests, and casual and migrant labour, which are all risk factors for labour exploitation. Where processing happens in regions with limited regulation, workers may face underpayment, excessive hours, and informal intermediaries, creating vulnerabilities to forced labour. Walk Free has documented severe labour-abuse risks across agricultural value chains in Southeast Asia, which apply to coconuts and similar commodities.¹²

8 International Energy Agency (IEA) (2022) 'Executive summary', in *Solar PV Global Supply Chains*. Paris: IEA. Available at: <https://www.iea.org/reports/solar-pv-global-supply-chains/executive-summary>

9 U.S. Department of Labor, Bureau of International Labor Affairs (2024) *List of Goods Produced by Child Labor or Forced Labor*. Washington, DC: U.S. Department of Labor. Available at: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

10 Anti-Slavery International (2023) *Letter to the G7 on the Just Transition and Uyghur Forced Labour*. Available at: <https://www.antislavery.org/wp-content/uploads/2023/05/G7-Just-Transition-Uyghur-Forced-Labour.pdf>

11 Australian Human Rights Commission (2022) *Migrant workers and their rights in Australia*. Available at: <https://humanrights.gov.au/our-work/business-and-human-rights/publications/migrant-workers-and-their-rights-australia>

12 Walk Free (2023) *Global Slavery Index 2023: Modern Slavery in the Philippines (Country Study)*. Perth: Minderoo Foundation. Available at: <https://cdn.walkfree.org/content/uploads/2023/11/14130723/gsi-country-study-philippines.pdf>

Managing modern slavery risks in our operations

In line with UNGP Principles 13, 15, and 17, Lyka is required to undertake human rights due diligence and address any adverse impacts within our operations.

We place a strong emphasis on the health, safety, and wellbeing of all employees and have established a governance framework that goes beyond legal compliance to ensure that human rights are respected across the business. Responsibility for managing modern slavery risk within our operations sits primarily with Manufacturing, Supply Chain, People, and SHEQ teams. These standards also apply to contractors engaged by Lyka, who are held to the same requirements and expectations as employees.

Culture, principles, and values at Lyka

At Lyka, our values and principles shape our internal culture and create a safe, supportive space for everyone in the business. These values foster both physical and psychological safety, going beyond simply preventing modern slavery risks to actively supporting growth, wellbeing, and fairness for all team members.

Our commitment to social responsibility is embedded in how we work and is reflected in the following principles:

- ✓ **Build our pack:**
We support each other through collaboration, coaching and engagement to ensure value-adding, safe practices are conducted across the organisation.
- ✓ **Be your pup's hero:**
We always do the right thing, never compromising on safety or integrity.
- ✓ **Play with respect:**
We act inclusively in every situation and nurture an environment of psychological safety where all voices are heard.
- ✓ **Leave a positive pawprint:**
We consider the environmental, social, and governance impacts of our decisions, ensuring our actions contribute positively to our people, community, and planet.

Together, these principles guide behaviour that protect rights, uphold dignity, and ensure modern slavery risks are neither tolerated nor embedded in our culture or operations. All employees participate in a professional development cycle every 6 months, with a strong focus on alignment with our values. Further detail on modern slavery risks directly linked to Lyka's operations can be found in the supply chain risks section on Page 21.

Internal policies and legal documents

Lyka has established policies that set out our expectations for team member behaviour. These go beyond relevant national labour laws and meet B Corp requirements, ensuring we have proper processes and practices to identify, prevent, and remediate modern slavery risks.

Policy	Purpose and implementation
Code of conduct	Forms the foundation for how Lyka pack members treat each other. Bribery and corruption are strictly prohibited in any form, whether direct or indirect, in both the public and private sectors. Lyka also prohibits and monitors self-dealing by board members, officers, and executives. The policy commits to a safe business environment for employees and contractors, covering both physical and psychological safety, which extends to protecting staff. Harassment, discrimination, and bullying are not tolerated. Team members can raise concerns confidentially without suffering any form of retaliation, reprisal, or detriment for reporting a violation.
Whistleblower policy	Lyka has a comprehensive whistleblower policy that encourages reporting of misconduct, including corruption, theft, fraud, bribery, and other illegal activities. Reports can be made through multiple channels, including the Lyka Integrity Line, managed by our Whistleblower Protection Officer who is a member of the Executive Leadership Team. The policy ensures confidentiality and protects reporters retaliation. Anyone who disadvantages a person for making a report may face disciplinary action, up to dismissal. Reports can be made anonymously and apply to all team members, contractors, and external stakeholders, reflecting Lyka's commitment to ethical business practices.
Diversity, equity and inclusion policy	Articulates the expectation that all team members treat everyone with respect and dignity at work and celebrate differences. Lyka aims to create a workplace free from intimidation, bullying, or harassment and will discipline anyone who engages in such behaviour. The policy also promotes equity through transparent recruitment, compensation, and promotion processes. Anyone who feels they have been subject to discrimination are encouraged to raise their concerns so corrective measures can be taken.
Work health and safety policy	Defines the requirements for a safe and healthy work environment for all employees, contractors, visitors, and anyone affected by Lyka's business operations. It aims to prevent work-related injuries, illnesses and incidents by setting processes to identify, assess, monitor, and control risks from workplace hazards. Key actions include employee training, incident reporting, emergency preparedness, health and wellbeing, contractor and visitor safety, and continuous improvement. The policy also covers standards such as personal protective equipment requirements, manual handling guidelines, and non-conformance procedures.
Sustainability guild policy	Articulates the roles and responsibilities for the continuous improvement of sustainability across the business, including modern slavery and other social and environmental topics.

Internal due diligence processes

At Lyka, we recognise the importance of strong due diligence procedures to identify, assess, and address the potential modern slavery risks within our operations.

While we consider the risk of modern slavery within our direct business activities to be low, we remain committed to maintaining consistent and reliable practices that protect the health, safety, and wellbeing of our people.



Whistleblower and grievance procedure

We understand that without clear and trusted ways to raise concerns, risks such as modern slavery and other harmful practices can go unnoticed.

To prevent this, Lyka has established a robust grievance and misconduct remediation framework designed to:

- Protect the privacy and safety of individuals involved
- Ensure fair and just outcomes
- Provide clear pathways for issues to be reported and resolved in a timely manner

Our grievance process is guided by 4 key steps (see diagram below) to make sure that any issues related to modern slavery, psychological safety, or misconduct are not left unreported.

Channels for raising grievances

At Lyka, we want everyone to feel safe speaking up. Team members can raise concerns in several different ways, depending on their circumstances.

- Submitting a **Zendesk support ticket**
- Contacting the **dedicated grievance email hotline**, managed only by select members of the People Team
- Raising concerns directly with the People Team, or via their **manager or skip-level manager**

Having multiple reporting options means that employees can choose the the approach that best suits the nature and seriousness of the issue.

Governance, roles, and responsibilities

All grievances are triaged by a designated group within the People Team and kept securely in a private database. When needed, immediate steps are taken to protect the psychological and physical safety of those involved. We also offer confidential support through our Employee Assist Program to affected employees.

Each situation is managed case-by-case by the People Team. If a concern involves a manager or executive-level employee, extra measures are taken to keep the process fair and independent. Ultimately, grievances could be raised all the way to the board level.

This approach helps prevent harm, promotes accountability, and ensures grievances are resolved in a way that prevents recurrence.

Investigations

Investigations are led by the People Team in consultation with the affected party, witnesses, and other relevant stakeholders. This helps us make sure all perspectives are considered for a fair, transparent, and informed outcome. These processes are regularly reviewed by the Executive Leadership Team and the People Team to make sure they stay effective, respectful, and up to Lyka's standards.



Health and safety due diligence process

Lyka takes the health and safety of its workers seriously. We recognise that safe and healthy working conditions are a fundamental labour right and a core part of responsible business conduct.¹ Poor health and safety practices can increase the risk of forced or exploitative labour within operations², which is why Lyka has put in place a robust Safety, Health, Environment, and Quality (SHEQ) program. This program follows internationally recognised standards and ISO-certified procedures to make sure all safety and environmental requirements are met.

Risk assessment and management controls

A key part of our SHEQ program is spotting and managing risks before they become hazards. Some of the ways we do this include:

- Pre-employment medical assessments for workers entering our sites
- Verification and management of permits for high-risk workers (e.g. forklift drivers)
- Routine preventative maintenance, risk assessments and fault testing for all machinery used in operations
- Standard operating procedures (SOPs) for all relevant equipment to ensure safe handling by employees
- Implementation of a SHEQ management system software to operationalise all SHEQ requirements and enable real time reporting and monitoring, as well as data-driven corrective actions
- Regular reviews of management controls, including safety GEMBA walks and internal and external audits

These practices help us identify critical hazard points early and address them proactively to prevent incidents.

- 1 International Labour Organization (1981) Convention No. 155: Occupational Safety and Health Convention, 1981 (No. 155). Geneva: International Labour Office. Available at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312300
- 2 Organisation for Economic Co-operation and Development (OECD) (2023) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Paris: OECD Publishing. Available at: <https://www.oecd.org/investment/mne/>

Emergency response plans

Lyka is committed to ensuring that all employees confidently know what to do in an emergency. We have clear guidelines, defined roles, and well-communicated procedures to protect the safety and wellbeing of everyone on site.

Key actions include:

- Updating our Business Continuity Plan on a regular basis, covering major risks across all areas of the business
- Clearly displayed evacuation diagrams across all sites, with trained personnel designated to support emergency protocols
- Regular emergency evacuation drills to reinforce roles, responsibilities, and procedures
- Designated first aid and fire safety officers to ensure readiness for various emergency scenarios

Protecting our people is paramount. Our preparedness ensures that if an emergency arises, we can act swiftly, safely, and effectively.



Health and safety due diligence process (continued)

Governance, roles and responsibilities

The SHEQ team oversees all health and safety processes across Lyka. They proactively assess operations, spot risk areas, and drive improvements. Oversight and accountability sit with the Chief Operating Officer, the Head of Operations, and the Executive Leadership Team, ensuring that health and safety remains a key part of our culture.

Incident investigations

All incidents are investigated in line with with regulatory bodies, including WorkSafe Victoria and SafeWork NSW. We log everything into our issues register, tracking near misses, hazards, and incidents.

Each investigation records:

- Details of the injured person (if applicable)
- Date, time, and location of the incident
- Nature of the event (e.g. crush, fall, exposure)
- Reporting and escalation pathways followed
- Procedure or operation being performed at the time
- Safety equipment used to mitigate risk
- Any contributing or additional factors

These investigations helps us find root causes and take preventative measures to stop reoccurrence. Using this information, the hierarchy of control is used to solve items higher in the hierarchy (see page 36 for more detail).

Internal remediation processes

Lyka's internal remediation processes are designed to deliver fair, legitimate, and effective outcomes whenever risks or incidents are identified.

We focus on supporting the people affected, fixing the root causes, and preventing similar issues from happening again. All our practices are aligned with employment law, health and safety regulations, and modern slavery legislation to ensure consistent, trusted, and legally compliant standards across the organisation.

Whistleblower and grievance remediation process

The grievance remediation process is guided by principles of equity, fairness, and non-retaliation, so that all parties are treated with dignity and respect. Lyka makes sure to proactively resolve issues to both addresses immediate concerns and strengthen organisational safeguards against modern slavery risks.

As part of this process, Lyka:

- **Works with legal partners** to ensure outcomes comply with employment, safety, and modern slavery laws
- **Consults with the Executive Leadership Team** to find safe and effective solutions, prevent recurrence, and remove practices that could contribute to exploitation or slavery-like conditions
- **Provides training or education**, where needed, to help employees and managers understand follow best practices
- **Offers support services**, including our Employee Assistance Program (EAP), to protect the wellbeing of anyone involved

Lyka takes all complaints and feedback on its remediation practices seriously. We review every case not just for resolution, but for the lessons it offers. This helps us strengthen our policies, close potential gaps, and continue building a workplace that's fair, accountable, and free from exploitation.

Health and safety remediation process

Lyka's Health and Safety Team follows a clear and structured process to respond to any hazards, near misses, or injuries that occur in our operations. If an incident involves an individual, it's immediately reported to the relevant authority, either WorkSafe Victoria or SafeWork NSW, should an urgent investigation be required. In more serious situations where injury has occurred, emergency services are contacted right away.

Once immediate risks are managed, we use an internationally recognised hierarchy of controls to find and apply the most effective long-term solutions. This approach helps us address the root cause of each issue and strengthen our overall safety management systems.

1. **Elimination:** Remove the hazard entirely.
2. **Substitution:** Replace the hazard with a safer alternative.
3. **Engineering controls:** Add physical safeguards, barriers, or warning systems.
4. **Administrative controls:** Improve procedures, training, and site management practices.
5. **Personal Protective Equipment (PPE):** Use protective clothing and gear such as high-visibility apparel and safety footwear.

At Lyka, we take all health and safety risks seriously. Any non-conformance to our standards are addressed through our established procedures. Each incident is reviewed not only to resolve the immediate issue but also to help us learn, improve, and reduce risks across our operations – reinforcing our commitment to a safe and responsible workplace.

Training activity and communication

Lyka provides ongoing training and communication to help our people understand their rights, stay safe, and feel confident speaking up when something isn't right. These initiatives also build awareness of modern slavery risks and strengthen our commitment to ethical and responsible business practices.

Sustainability 101 course

As part of our in-house Sustainability 101 course, Lyka provides a dedicated module on modern slavery and the risks that exist within global supply chains. This video-based training is mandatory for all new employees and helps every team member understand how modern slavery relates to Lyka's operations and suppliers.

Employee onboarding

During onboarding, all employees are introduced to Lyka's Code of Conduct, Whistleblower Policy, and Diversity, Equity, and Inclusion Policy. These resources outline expected standards of behaviour and clearly explain how to raise a concern safely and confidentially. This ensures everyone knows their rights and the steps they can take if issues arise.

Workplace awareness materials

To complement formal training, we display informative posters in our office spaces and kitchens. These highlight available wellbeing services, key health and safety measures, and information about accessing Fair Work. By keeping these resources visible and easy to understand, we create a workplace where support and safety are always front of mind.

SHEQ and on-site safety training

All Lyka employees required to complete operational health and safety training as part of their onboarding. This also applies to anyone visiting our sites for the first time; including contractors, visitors, and employees. Training covers our Golden SHEQ rules, such as respecting barriers and exclusion zones, avoiding the tampering of safety devices, and ensuring all necessary documentation is in place before starting high-risk activities.

Our manufacturing team also takes part in regular toolbox talks focused on safe work practices when performing high-risk tasks, such as manual handling. These sessions are informed by our ongoing hazard identification and near-miss reporting. In addition, our Lyka Operations Management System is a full module dedicated to health and safety, which is regularly audited, and supported by ongoing leadership and frontline training. Through this, frontline workers and leadership are trained on work health and safety best practices.

Managing risks in our supply chain

Lyka has strong checks in place to ensure that all procured goods and services meet the highest standards of food safety, quality, environmental responsibility, and social accountability.

While our strong internal culture has helped us make great progress so far, we know the work is ongoing. We're committed to strengthening our internal systems so we can better identify risks, improve processes, and prevent modern slavery across our supply chain.

In the next reporting year, we plan to expand our oversight beyond tier 1 in high-risk industries, and continue building a deeper, more proactive approach to modern slavery risk management. This includes gathering more audit reports, enhancing our training programs, and developing a stronger remediation process.

Supply chain policies and legal documents

Lyka has a number of supply chain policies that guide our approach to corporate social responsibility and set clear expectations for ethical conduct. These policies set out our ongoing commitments to preventing modern slavery within our supply chain.

Policy	Purpose and implementation
Supplier code of conduct	Sets out the key standards Lyka expects from all suppliers in the production and delivery of goods and services. This includes fair labour practices such as compliance with working hours, freely chosen employment, freedom of association, prohibition of child labour, non-discrimination, and prevention of harsh or inhumane treatment. Suppliers are required to maintain safe and healthy workplaces, providing adequate training, risk management, and conditions that minimise modern slavery risks.
Product purchase agreement template	Defines the terms and conditions under which Lyka engages with suppliers. It specifies expectations around modern slavery risks and indicators, including forced labour, child labour, diversity and inclusion, harassment and abuse, health and safety, and fair working hours and compensation. The agreement also gives Lyka audit rights to investigate potential breaches or concerns related to modern slavery risk indicators.

Supply chain due diligence process

Lyka's supply chain due diligence framework follows well-recognised national and international standards, including the OECD Due Diligence Guidance for Responsible Business Conduct, the UNGPs, and the Responsible Sourcing Tool developed by the U.S. Department of State and Verité. These frameworks help guide how we identify, prevent, and address modern slavery and broader human rights risks across our operations and supply chain.

Our due diligence activities are designed so that we maintain oversight of human rights risks, from pre-screening potential suppliers through to ongoing monitoring, remediation, and continuous improvement.

Governance

New suppliers

- Screening on a range of different financial, social, environment, quality and safety indicators before proceeding.
- Engaging in active engagement to ensure human rights requirements are communicated and understood by prospective suppliers.

Current suppliers

- Encouraging dialogue with our current suppliers to directly raise grievances with us and reduce any modern slavery risks.
- Requiring in-scope suppliers to complete questionnaires and audits through our supply partner, Sedex.



Governance

Lyka's modern slavery due diligence processes are overseen and continuously improved by key teams across the business.

- The SHEQ (Safety, Health, Environment and Quality) and Sustainability Teams define supplier expectations, develop ethical sourcing requirements, and review supplier certifications.
- The Procurement Team is responsible for implementing due diligence activities during supplier onboarding and contract management, so that all engagements meet Lyka's ethical and sustainability standards.
- The Executive Leadership Team provides governance and oversight, reviews performance, endorses key actions, and supports continual improvement initiatives.

We are working to formalise this governance on internal policies to ensure consistent oversight of our modern slavery due diligence framework. In future reporting periods, we also plan to include independent audits to strengthen assurance and align with best practice.

Pre-screening process

Before entering into relationships with new suppliers, Lyka carries out pre-screening activities to prevent modern slavery and other human rights risks.



Recipe ingredients:

Many of our ingredients are certified organic, which requires strict audit standards that often overlap with ethical labour practices. We work with suppliers to trace ingredient origins and assess geographic risks, ensuring transparency over raw material sourcing.



Labour hire firms:

We engage contractors through organisations licensed under the Victorian Labour Hire Licensing Scheme, which protects vulnerable workers and promotes fair labour practices. In jurisdictions without licensing schemes, such as New South Wales, we ensure suppliers comply with employment laws and fair work standards.



Packaging suppliers:

One of our key packaging suppliers is B Corp certified, meaning they undergo third-party social and environmental audits that include the assessment of labour rights and modern slavery indicators.



Other goods and services:

All other suppliers are screened for fraud, ethical compliance, and alignment with Lyka's internal frameworks to prevent exposure to modern slavery risks.

Lyka uses a tiered risk-based approach to supplier due diligence, focusing attention on higher-risk suppliers or categories. Current pre-screening looks at structural and contextual risks, such as country of origin, industry sector, and workforce characteristics. Over time, we plan to integrate more on-site and operational risk factors in the pre-screening process to improve visibility and assessment accuracy.

To strengthen prevention, Lyka will introduce a standardised supplier screening questionnaire for all new suppliers. This will help flag and avoid suppliers associated with known modern slavery violations or high inherent risk.

Current supplier assessments

Lyka works closely with Sedex, a leading ethical trade platform, to analyse, assess, and manage risks across our supply chain. Sedex helps us evaluate supplier performance and provides tools to strengthen transparency and continuous improvement.

Our key activities include:

- **Supply chain mapping:** We have mapped our direct supplier base to identify high-risk categories and improve visibility into our sourcing network.
- **Inherent risk assessments:** Each year, we review modern slavery risks across our direct suppliers, using tools such as the Walk Free Foundation's Global Slavery Index, Sedex's Radar Risk Assessment, and resources from international and government bodies focused on forced and child labour.
- **Sedex self-assessment questionnaires (SAQs):** Suppliers are encouraged to complete Sedex SAQs to show how they manage labour standards, site practices, and overall operations. These help us spot risks and guide targeted corrective actions.
- **Sedex SMETA audits:** Lyka currently monitors 8 supplier sites through the Sedex platform using SMETA (Sedex Members Ethical Trade Audit) data. These independent, third-party audits provide verified insights into working conditions and compliance with labour rights standards.

We aim to keep strengthening supplier engagement by increasing SAQ participation and expanding third-party audits, especially for high-risk suppliers. Over time, we plan to extend visibility and due diligence beyond tier 1 to include tier 2 and higher-tier suppliers.

Our program follows the OECD's 6-step due diligence model, covering responsible business conduct, risk identification and assessment, prevention and mitigation, tracking, reporting, and remediation. Combined with effective grievance mechanisms and supplier collaboration, this framework supports our continuous improvement approach.

Supply chain remediation processes

Lyka's ongoing supplier checks and engagement processes make sure that all procured goods and services meet high standards of quality, social responsibility, and environmental performance. So far, our assessments show a low risk of modern slavery across our immediate (tier 1) supply chain, but we recognise that risks may still exist further down the supply chain.

In line with the UNGPs, particularly Principle 22 (remediation of adverse human rights impacts) and Principle 29 (establishing operational-level grievance mechanisms), Lyka is committed to developing formal remediation processes that uphold accountability for the human rights of all workers connected to our business activities.

Our approach will include:

- Strengthening engagement channels with workers in our tier 1 suppliers so they can safely raise concerns and access support.
- Helping suppliers build and maintain their own due diligence and remediation frameworks in line with the ILO's fundamental conventions, notably Conventions 29 (Forced Labour), 105 (Abolition of Forced Labour), and 182 (Worst Forms of Child Labour).
- Extending oversight and remediation programs to tier 2 and beyond suppliers in high-risk industries, following the OECD Due Diligence Guidance for Responsible Business Conduct to embed accountability, amplify worker voices, and drive systemic improvements across the supply chain.

These programs will be tailored to specific industries and regions, ensuring remediation mechanisms are practical, culturally appropriate, and effective at addressing root causes of modern slavery risks.

Supply chain training and capacity building

Lyka maintains strong communication networks with our direct suppliers, fostering a culture of shared learning and transparency. Our supply chain team regularly engages in knowledge exchange to support best practices in sustainability, quality, and ethical sourcing.

Building on this foundation, we plan to expand training and capacity-building efforts to meet international best practice, including:

- ✓ **Developing a centralised Responsible Sourcing Knowledge Hub:**
Central online resource for suppliers at all tiers. This will provide guidance on identifying, mitigating, and remediating modern slavery risks, aligned with the ILO's Fair Recruitment Initiative, UNGP Principles 16–20 (embedding human rights due diligence), and the Australian Modern Slavery Guidance.
- ✓ **Offering targeted training programs:**
Online and face-to-face sessions covering modern slavery definitions, indicators, and remediation strategies, using tools such as the Responsible Sourcing Tool and the ILO's Combating Forced Labour Indicators framework.
- ✓ **Collaborative forums:**
Workshops and supplier forums to encourage shared accountability and transparent reporting of human rights performance.

Ultimately, Lyka's goal is to empower both direct and indirect suppliers to identify and manage modern slavery risks within their own operations and supply chains, fostering a network of responsible, informed, and proactive partners. We also aim to extend these efforts beyond suppliers, collaborating with not-for-profit organisations, research institutions, and government bodies to ensure that we follow best practice in this space.

Assessing Lyka's modern slavery program effectiveness

Lyka measures the effectiveness of our modern slavery program through ongoing monitoring, feedback, and continuous improvement.

Our framework aligns with the OECD Due Diligence Guidance for Responsible Business Conduct and the UNGPs, which emphasise the importance of monitoring, tracking, and communicating outcomes to ensure due diligence systems are work in practice.

The framework below shows how we evaluate whether our modern slavery controls are effective and where we can improve across our operations and supply chain.

Throughout this report, we aim to be transparent about how we measure and respond to modern slavery risks, ensuring our actions deliver tangible progress over time.



Assessment key performance indicators (KPIs)

In FY25, we reviewed our company’s performance against the following qualitative and quantitative KPIs. These indicators help us track progress, find gaps, and guide improvements in governance, policies, and procedures. By using them, we strengthen our modern slavery program and ensure our practices continue to evolve and improve.

Topic	Qualitative indicators	Quantitative indicators	Who is Responsible	Review Cadence Cycle
Controls to prevent modern slavery risks	<ul style="list-style-type: none"> Review of modern slavery-related policies against best practice benchmarks and international frameworks Feedback from internal teams on policy effectiveness and coverage of modern slavery risk areas 	<ul style="list-style-type: none"> Percentage of suppliers signed to the Supplier Code of Conduct Total number of grievances raised across operations and the supply chain Usage rate of the Employee Assistance Program (EAP) 	<ul style="list-style-type: none"> Executive Leadership Team Sustainability Team 	Annual
Identification and due diligence of modern slavery risks	<ul style="list-style-type: none"> Employee awareness of grievance and reporting channels Increased dialogue and collaboration with suppliers on modern slavery issues Feedback from employee exit interviews Alignment of Lyka’s risk assessment and due diligence processes with international frameworks 	<ul style="list-style-type: none"> Percentage of direct suppliers completing a self-assessment questionnaire (covering inherent, site, and management control risks) Percentage of direct significant supplier sites audited for modern slavery Internal engagement survey results on psychological wellbeing, health, and safety Number of modern slavery risks identified (including major and critical risks) 	<ul style="list-style-type: none"> Executive Leadership Team People Team Procurement Team SHEQ Team Sustainability Team 	Quarterly
Remediation efforts to address modern slavery risks	<ul style="list-style-type: none"> Review of patterns and trends in identified risks to guide appropriate remediation measures Supplier feedback on remediation and corrective action processes 	<ul style="list-style-type: none"> Number of modern slavery risks effectively remediated Average time taken to resolve operational and supply chain grievances 	<ul style="list-style-type: none"> People Team Procurement Team SHEQ Team Sustainability Team 	Quarterly

Topic	Qualitative indicators	Quantitative indicators	Who is Responsible	Review Cadence Cycle
Reducing risks and improving health and safety across the business	<ul style="list-style-type: none"> Employee feedback on standard operating procedures for manual handling Discussions and awareness of health and safety principles across the organisation 	<ul style="list-style-type: none"> Number of safe days Number of hazards, near misses, and incidents Lost time injury frequency rate 	<ul style="list-style-type: none"> Executive Leadership Team SHEQ Team 	Monthly
Stakeholder engagement and collaboration on modern slavery issues	<ul style="list-style-type: none"> Enhanced discussions with employees and suppliers on integrating human rights into decision-making Feedback from external stakeholders on Lyka's modern slavery risk management approach 	<ul style="list-style-type: none"> Percentage of relevant internal staff trained on modern slavery and human rights Number of suppliers participating in modern slavery workshops or training Total number of modern slavery training sessions conducted 	<ul style="list-style-type: none"> Procurement Team Sustainability Team 	Annual
Communication and transparency of progress towards eradicating modern slavery risk	<ul style="list-style-type: none"> Awareness among employees of internal policies and reporting mechanisms Awareness of modern slavery issues among the Executive Leadership Team Awareness of Lyka's modern slavery commitments among customers and external partners 	<ul style="list-style-type: none"> Percentage of modern slavery reports submitted on time 	<ul style="list-style-type: none"> Executive Leadership Team Sustainability Team Marketing Team 	Annual
Overall reduction of modern slavery	<ul style="list-style-type: none"> Evaluation of whether the frequency and severity of modern slavery risks are decreasing over time Understanding patterns and causes of identified risks on a case-by-case basis 	<ul style="list-style-type: none"> Average supplier modern slavery risk score (measured via platforms such as Sedex) 	<ul style="list-style-type: none"> Executive Leadership Team People Team Procurement Team SHEQ Team Sustainability Team 	Annual

As Lyka's program matures, one of our key priorities is to improve how we measure and evaluate effectiveness. We want to move beyond just tracking activities and outputs to understanding real outcomes and impacts. Our goal is to embed evidence-based assessment practices that show whether our actions are meaningfully reducing modern slavery risks across our operations and supply chain.

Future actions

In this first year of reporting under the Modern Slavery Act, we've gained valuable insights into our current approach and identified key opportunities to strengthen our due diligence systems.

These learnings have created a clear roadmap to guide our continuous improvement as we embed respect for human rights throughout our operations and supply chain.

Our future actions are guided by leading international frameworks, including the UNGPs, the OECD Due Diligence Guidance for Responsible Business Conduct, and the Australian Government's Guidance for Reporting Entities under the *Modern Slavery Act 2018* (Cth). These frameworks shape how we identify, prevent, mitigate, and remediate modern slavery risks through structured governance, collaboration, and transparency.

The following table outlines specific actions we plan to implement in coming years to improve the effectiveness of our modern slavery program.

Action	Explanation
Strengthen governance and policy frameworks	Lyka will continue to strengthen our internal and supplier-facing policies covering modern slavery and human rights risks. Planned policies include a Responsible Recruitment Policy, Responsible Sourcing Policy, and Supplier Whistleblower Policy, which will formalise standards for ethical conduct, worker protections, and responsible sourcing.
Clarify governance roles and responsibilities	Governance roles will be defined more clearly, ensuring to ensure stronger accountability and smooth feedback loops across management controls, grievance mechanisms, remediation pathways, and training. Modern slavery will become a standing agenda item for the Sustainability Guild, with outcomes reported to the Executive Leadership Team and broader organisation.
Enhance technological capabilities for risk analysis	While our Sedex partnership gives strong supplier risk insights, we plan to explore additional platforms (e.g., Sayari Graph, WRAP, Amfori, Fair Farms, and Global G.A.P) to support data-driven analysis and improve visibility of supplier performance and geographic risks.
Expand independent audit coverage and verification	Lyka will increase the frequency and depth of supplier audits to verify compliance and improve transparency. This includes using more third-party audits for high-risk suppliers and building internal capacity for self-audits. The goal is collaborative risk identification and remediation for both Lyka and our suppliers.

Action	Explanation
Extend due diligence to tier 2 and beyond	We plan to include upstream suppliers in our due diligence, especially in higher-risk areas like packaging and internationally sourced goods. This will likely include gathering site-specific modern slavery risk data and integrating broader sustainability indicators such as health and safety, food quality, and environmental practices.
Establish grievance and whistleblower mechanisms for supply chain workers	Lyka plans to develop accessible and confidential channels so supply chain workers can safely report modern slavery concerns. We will also engage in meaningful consultation with potentially affected groups to make sure these mechanisms are trusted, culturally appropriate, and effective.
Develop a structured remediation framework	To respond to identified risks, we will formalise a remediation framework outlining clear processes for addressing grievances and supporting affected workers. This includes providing resources to suppliers, setting appropriate timeframes, and tracking corrective actions to ensure effectiveness.
Strengthen training and awareness programs	Modern slavery and human rights training will expand for both internal staff and suppliers. Planned initiatives include an online resource hub for suppliers, targeted training sessions for procurement and supply chain teams, and workshops on risk identification, due diligence, and remediation practices.
Increase collaboration and stakeholder engagement	Lyka will work more closely with industry peers, government bodies, and relevant organisations to share knowledge, benchmark practices, and advocate for systemic improvements in modern slavery prevention. We are exploring participation in initiatives such as the Consumer Goods Forum Human Rights Coalition, the UN Global Compact Network Australia, and the NSW Anti-Slavery Commission's working groups.
Build modern slavery metrics and reporting tools	To enhance transparency and accountability, we'll develop a modern slavery dashboard to track progress against key metrics and outcomes. This will enable improved monitoring, evaluation, and public reporting of program performance over time.



Lyka recognises that tackling modern slavery is a long-term commitment.

As our program evolves, we will keep refining our approach based on emerging risks, industry developments, and stakeholder feedback.

Our ongoing efforts aim not just to meet legal requirements, but to actively improve human rights outcomes across our value chain.

Process of consultation with entities Lyka owns or controls, and any further information

All operating and non-operating entities owned or controlled by Lyka Wellness Pty Ltd operate under a common governance framework; the same Executive Leadership Team and Board of Directors provides oversight for these entities and was consulted in, and contributed to, the drafting of this modern slavery statement.



Our employees, customers and community

At Lyka, our deep commitment to community care is at the heart of everything we do. From our employees and customers to the wider dog-loving community, we aim to build genuine connections that go beyond transactions. Guided by our core value, “Puppers are our Purpose,” we focus on fostering trust and care for the pets and people we serve.

Our employees are compassionate and caring individuals who work together to build an inclusive and supportive workplace. This culture has earned us recognition such as 4th place on the AFR BOSS Best Places to Work list, the AtWork Best Employer Award for supporting employees from disadvantaged backgrounds, and the Hatch Best Place to Work for Gen Zs Award.

We extend the same care to our customers through a professional and empathetic service team. Our community initiatives further this commitment by helping us understand and respond to what our customers truly value. We also create safe spaces for dog owners to connect, whether at in-person events where customers and their dogs can come together or through thoughtful, patient responses to customer feedback and concerns.

Beyond our day-to-day operations, Lyka actively contributes to the community through team volunteering and environmental initiatives, including dog shelter visits, clean-up events, and tree planting days. We also donate food to dog shelters to support dogs in need.

Preventing modern slavery and upholding ethical practices is part of this broader duty of care. By ensuring that our products are made through supply chains that respect human rights and dignity, we reflect the same values of compassion and protection that inspire our customers’ love for their pets.

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