



Modern Slavery Statement



Contents

Introduction	3
Reporting entities	4
Our business	4
Our supply chain	5
Modern slavery risk	5
Modern slavery action	6
Modern slavery governance	6
Our policies on slavery	7
Training	8
Remediation	9
Our effectiveness in combating modern slavery	9
Schedule 1 - Reporting Entities	11

Introduction

We are committed to continuously improving our practices to combat modern slavery and uphold human rights across our operations and supply chains. Reaching the reporting threshold under the Modern Slavery Act 2018 (Cth) has marked an important step in our journey, and we recognise the responsibility that comes with it.

Over the past year, we have laid the foundations of our modern slavery risk and compliance program, including the establishment of governance structures, key policies, supplier due diligence processes, and broad internal engagement. These efforts reflect our determination to build a robust and sustainable framework that not only meets regulatory requirements but also aligns with our values.

Looking ahead, we will continue to strengthen our approach by embedding modern slavery risk management into our day-to-day operations. This includes rolling out targeted training in the new year, deepening our supplier engagement, and enhancing our risk assessment capabilities. Our newly formed Management Committee will play a critical role in overseeing these initiatives and ensuring accountability.

We understand that addressing modern slavery is an ongoing process, and we are committed to transparency, collaboration, and continuous improvement as we work to protect the rights and dignity of all people connected to our business.

Reporting entities

This statement covers CVS Australia operations. The reporting entities are set out in Schedule 1 (“CVS Australia Group”).

The CVS Australia Group has an annual consolidated revenue of at least \$100 million.

This statement is prepared in accordance with the requirements of section 14 of the Modern Slavery Act 2018 (Cth) and covers the reporting period 1st July 2024 to 30th June 2025.

We have acted in consultation with the CVS Australia Group in preparing this statement.

Our business

CVS is a global provider of veterinary services and related support offerings in the animal health sector. We are committed to delivering high-quality clinical care and support services to pets, their owners, and the broader veterinary profession.

We have over 8,800 employees and operate in Australia and the United Kingdom.

CVS entered the Australian veterinary market in 2023 and has grown rapidly, now operating 52 small animal practices and employing over 950 people across Australia.

CVS is one of the largest veterinary service providers in the United Kingdom, with over 420 practices across the UK. These include small animal, equine, and farm general practices, as well as specialist-led multi-disciplinary referral hospitals and dedicated out-of-hours clinics.

In addition to clinical services, CVS provides a wide range of support services in the UK including:

1. Laboratories offering diagnostic services
2. Vet Direct (supplier of veterinary products) and MiVetClub buying group
3. Animed Direct online retail business
4. MiPet pet insurance and veterinary medicines
5. Healthy Pet Club wellness programs

Our focus in Australia remains on small animal care, supported by the expertise and infrastructure of our UK parent company.

Our supply chains

In this reporting period, we undertook a mapping of our supply chains, with a particular focus on clinical procurement, which we consider to present the highest risk for our business due to the nature of goods and services involved and the complexity of global supply chains.

Our clinical procurement supply chains include:

- Pharmaceuticals
- Equipment
- Consumables
- Nutrition products
- Pet retail products
- Compounding services
- Pathology services

These supply chains often involve multiple tiers of suppliers, some of which operate in jurisdictions with higher prevalence of modern slavery risks. As part of our broader compliance framework, we have embedded supplier due diligence processes to assess and monitor these risks.

Modern slavery risk

Our approach to identifying and assessing risks of modern slavery in our business operations and supply chains is guided by our corporate governance and risk management frameworks. This includes:

- Mapping of business operations and supply chains to identify high-risk areas
- Supplier due diligence integrated into procurement processes
- Training and awareness for key personnel, with a formal training program to be rolled out in the new year
- Oversight by the Management Committee, which monitors implementation and effectiveness

To date, we have not identified any confirmed instances of modern slavery in our business operations or supply chains. However, we recognise that risks may exist, particularly in the upstream tiers of our supply chain where visibility is limited.

We anticipate that certain categories of procurement such as pharmaceuticals and consumables sourced from international suppliers, particularly those operating in regions with lower regulatory oversight or known labour rights concerns may be susceptible to modern slavery risks. These risks may include forced labour, deceptive recruitment practices, and exploitative working conditions.

As part of our continuous improvement efforts, we are working to enhance our supplier engagement, improve transparency across our supply chains, and strengthen our risk assessment tools to better identify and mitigate these risks.

Modern slavery action

We have in place systems to:

- Identify and assess risk areas in our business operations and supply chains.
- Mitigate the risk of modern slavery occurring in our business operations and supply chains.
- Monitor risk areas in our business operations and supply chains.
- Remediate harm caused.
- Protect those reporting through grievance mechanisms.

Further detail regarding the actions we have taken to combat modern slavery are set out below.

Modern slavery governance

Our approach to modern slavery is facilitated by a top-down governance framework, underpinned by the CVS Australia Corporate Governance Framework and supported by our Modern Slavery Policy.

The Board of CVS (Australia) Holdings Pty Ltd is responsible for the overall direction of our strategy to address modern slavery and for the oversight and approval of our annual modern slavery statement.

The Management Committee oversees the implementation and monitoring of our strategy across all business operations. This committee is empowered to make critical decisions, set priorities, and identify and mitigate risks, reporting regularly to the Board.

Our policies on slavery

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chains or operations.

The policy addresses risks by:

- Defining modern slavery in accordance with the Modern Slavery Act 2018 (Cth).
- Outlining responsibilities across all levels of the organisation.
- Embedding due diligence in supplier onboarding and annual reviews.
- Establishing clear reporting mechanisms and protections for whistleblowers.
- Providing training and awareness for all colleagues.

We also have in place the following related policies:

- **Whistleblower Policy**, which addresses modern slavery by providing a safe, confidential, and protected mechanism for reporting concerns.
- **Procurement Policy**, which addresses modern slavery by embedding ethical sourcing principles, requiring supplier due diligence, and mandating risk-based procurement processes. It ensures that purchasing decisions consider environmental, social, and ethical impacts and that suppliers are selected based on transparent criteria.
- **Supplier Code of Conduct**, which addresses modern slavery by setting minimum standards for suppliers, including prohibitions on forced labour, child labour, and exploitation. It requires suppliers to implement safeguards, conduct supply chain mapping, and provide regular training to staff. It also outlines expectations around workers' rights, wages, working hours, and whistleblowing protections.

These policies are embedded into our operations and supply chain practices through a structured compliance program that includes:

1. **Supplier Due Diligence:** All new suppliers are required to complete a detailed questionnaire covering business structure, labour practices, supply chain complexity, and modern slavery controls. Where relevant, additional questions are asked about workforce arrangements, recruitment practices, and subcontracting.

2. Contractual Clauses: We have recently implemented a contractual clause which we plan to include in all new supplier agreements which requires compliance with modern slavery laws, proactive risk identification and mitigation, and flow-down obligations to subcontractors. Suppliers must notify CVS of any breaches or suspected breaches and cooperate with our due diligence processes.

3. Ongoing Monitoring: Key suppliers are subject to annual reviews, and we reserve the right to request further information or conduct audits where risk is identified.

These measures ensure our expectations are clearly communicated and enforced throughout our supply chain, and that suppliers are held accountable for maintaining ethical and lawful practices.

Training

To ensure a high level of understanding of the risks of modern slavery in our business and supply chains, we have developed a tailored compliance training module that will be rolled out in the new year. This training is available for all employees and covers:

- Definitions and examples of modern slavery, including forced labour, debt bondage, servitude, human trafficking, and child labour.
- Modern slavery risks specific to veterinary practice, such as those associated with uniforms, pharmaceuticals, recruitment, and contracted services.
- Indicators of exploitation and how to identify signs of modern slavery.
- Responsibilities of staff and managers in reporting concerns.
- Reporting procedures, including escalation pathways and emergency contacts.

The training is interactive and includes scenario-based quizzes to reinforce learning and encourage engagement. It also integrates whistleblower protections and reporting mechanisms to ensure staff feel safe and supported when raising concerns.

We expect our suppliers to provide similar training to their staff and subcontractors, and we assess this as part of our supplier due diligence process.

Future improvements to our training program include:

- Embedding refresher modules into annual compliance cycles.
- Tracking completion rates and effectiveness through internal systems.

Remediation

To ensure that any harm caused by modern slavery in our operations or supply chains is addressed, we have established a remediation framework aligned with our whistleblower and compliance policies. This includes:

- A clear reporting and investigation process for suspected modern slavery incidents.
- Protective measures for affected individuals, including access to support services and safeguarding actions.
- Escalation of serious matters to the Board and/or Executive Committee of CVS Plc.
- Engagement with suppliers to address and rectify identified risks or breaches.
- Termination of supplier relationships where remediation is not possible or cooperation is lacking.

Our effectiveness in combating modern slavery

We are committed to assessing and improving the effectiveness of our modern slavery risk management program. As part of our internal governance and compliance processes, we use the following evaluation criteria to monitor progress and identify areas for improvement:

- Rollout of our modern slavery training program across all business units.
- Percentage of suppliers who have completed our due diligence process.
- Inclusion of modern slavery clauses in supplier contracts.
- Number of suppliers reviewed or re-assessed during the reporting period.
- Internal reporting and escalation of concerns or suspected breaches.
- Oversight and engagement by the Management Committee.

In the next reporting period, we intend to introduce additional key performance indicators (KPIs), including:

- Training completion rates.
- Number and nature of modern slavery-related concerns raised and resolved.
- Frequency and outcomes of supplier audits or follow-up reviews.
- Supplier engagement metrics, including responsiveness to due diligence.

These measures will help us track the maturity of our program, ensure accountability, and support continuous improvement in our efforts to combat modern slavery.

Approval and signature

This modern slavery statement is made by CVS Australia Group for the period 1st July 2024 to 30th June 2025.

This statement was approved by the board of directors of CVS (Australia) Holdings Pty Ltd ACN 667 652 520, being the principal governing body of CVS Australia Group on **13 November 2025**.

This statement is signed by an authorised representative of CVS (Australia) Holdings Pty Ltd ACN 667 652 520:



.....
Signature of Paul Higgs, Director

Date: **13 November 2025**

Schedule 1 – Reporting Entities

1. CVS (Australia) Holdings Proprietary Limited ACN 667 652 520
2. CVS Vets (Australia) Proprietary Limited ACN 667 654 686
3. Vetrigh Pty Ltd ACN 143 123 700
4. Ripley Valley Veterinary Hospital Pty Ltd ACN 615 637 931
5. McDowall Veterinary Hospital Pty Ltd ACN 098 336 246
6. Cattle Dog Health Pty Ltd ACN 630 661 693
7. Vet Referral Pty Ltd ACN 630 137 290
8. GVHCO Pty Ltd ACN 655 059 70
9. Selwood House Vets Pty Ltd ACN 674 878 856
10. Biome Vet Pty Ltd ACN 104 710 401
11. Southside Animal Hospital Pty Ltd ACN 159 404 896
12. Bruncker Road Veterinary Centre Pty Limited ACN 003 504 649
13. VPP Group Pty Limited ACN 679 803 680



CVS (Australia) Holdings Pty Ltd ACN 667 652 520 and its subsidiaries
CVS Australia Group