



Modern Slavery Statement 2021

1 Introduction

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) for the reporting period ending 31 December 2021¹ (**Reporting Period**) and sets out the steps the reporting entities listed below have taken to assess and address modern slavery risks in its operations and supply chains (**Statement**). Provet is a wholly owned subsidiary of Covetrus, Inc (**Covetrus**) which is incorporated in the United States of America.

Reporting Entities and their principle activities

- (a) Pelican Holdco Pty Ltd (ABN 53 146 840 422) (**Holdco**), the holding company of (b) below;
- (b) Pelican Acquisitions Pty Ltd (ABN 94 146 841 027) (**PAPL**), the holding company of (c) below;
- (c) Provet Holdings Pty Ltd (ABN 91 092 593 774) (**PHPL**), the holding company of (d) below;
- (d) Provet Pty Ltd (ABN 46 076 468 481) (**Provet**), head office functions and the parent company of (e) and (f) below as well as other subsidiaries operating in Australia and New Zealand;
- (e) Provet NZ Pty Ltd (ABN 60 099 854 065) (**PNZ**), sales of veterinary products; and
- (f) Provet Queensland Pty Ltd (ABN 52 076 437 280) (**PQPL**), sales of veterinary products.

2 Organisational structure and operations

Covetrus

Covetrus is a global animal-health technology and services company dedicated to empowering veterinary practice partners to drive improved health and financial outcomes.

Founded in February 2019 through the merger of Vets First Choice and Henry Schein Animal Health, Covetrus brings together products, services, and technology into a single platform that connects customers to the solutions and insights they need to work best. Covetrus' passion for the well-being of

¹ Provet's year end is 30 June but for the purposes of this Statement, the Reporting Entities have adopted the calendar year as the single Reporting Period.

animals and those who care for them drives us to advance the world of veterinary medicine. Covetrus is headquartered in Portland, Maine (USA), with more than 6,000 employees, serving over 100,000 customers around the globe.

Provet

Within Australia and New Zealand, Covetrus primarily supplies goods and services through a number of wholly-owned subsidiaries including Provet, PNZ and PQPL (collectively, **Covetrus ANZ**). The registered office of Provet is located at 48 Bell-are Ave, Northgate QLD 4013. A number of subsidiaries are owned or controlled by Provet, but are not themselves reporting entities and their supply chains are very similar to Provet's (apart from the entities listed in Part 1 of this Statement).

Holdco, PAPL and PHPL are holding companies and by their nature, do not have operations or employees. Provet employs approximately 50 people performing the Covetrus ANZ corporate functions such as human resources, marketing, finance and executive management. PNZ employs approximately 80 people and PQPL employs approximately 70 people, performing roles such as business area managers, customer service, warehouse staff, accounts, IT, marketing and other management positions.

Covetrus ANZ has seven warehouses positioned across Australia and three in New Zealand.

Partnering with approximately 800 veterinary suppliers to offer over 17,400 products, Covetrus ANZ is positioned to provide the broadest selection of veterinary products and strategic business solutions to over 3,750 veterinary practices in Australia and New Zealand.

The vision of Covetrus ANZ has always been to be more than a veterinary distributor but rather to be a company that provides added value to veterinary practices to help them build better businesses. The outstanding service and value added business solutions which differentiate Covetrus ANZ include:

- A comprehensive product offering at highly competitive prices for small, large and equine animal practices including biologicals, diagnostics, nutritionals, parasiticides, pharmaceuticals, disposables and more
- Our range of exclusively distributed products, offering affordable value
- Innovative technology solutions including inventory management, practice management software and websites
- Training and consulting for veterinarians, practice managers and veterinary nurses

3 Supply chain

Covetrus ANZ has over 500 active suppliers for animal healthcare products, many of which have long-standing relationships and therefore have clear expectations with regard to compliance and social accountability.

In Australia and NZ, Covetrus ANZ manage external vendor relationships through two channels – direct and indirect suppliers. The vast majority of suppliers are based in Australia. All goods purchased for resale are classified as direct suppliers, and indirect goods and services procured externally are included as indirect suppliers, for example, logistics, marketing, IT etc.

During the Reporting Period, Covetrus ANZ had suppliers from the following industries:

- Pharmaceuticals
- Nutraceuticals

- Nutrition (wet and dry pet food) and supplements
- Medical and surgical equipment and consumables
- Veterinary merchandise
- Stationery
- Equipment
- Electronics – IT hardware and software
- Logistics
- Food and beverage
- Utilities
- Marketing
- Professional services
- Facilities maintenance including cleaning

4 Modern slavery risks

Modern slavery risks in our operations

Holdco, PAPL and PHPL are holding companies and therefore have low risks of modern slavery in their operations and supply chains.

The risk of modern slavery occurring within the operations of Covetrus ANZ, and those of owned or controlled entities, are considered to be low having regard to:

- Australia and New Zealand having lower risks of modern slavery according to the Global Slavery Index (**GSI**)
- Compliance with the workplace laws of Australia and New Zealand
- The policies and procedures in place in relation to recruitment and workplace relations

Modern slavery risks in our supply chain

The majority of our direct and indirect goods and services are supplied from Australia, which is considered low prevalence for modern slavery risk according to the GSI. The majority of the products we source are from heavily regulated industries which may also mitigate the risk of modern slavery.

However, we recognise that there are inherent risks of modern slavery occurring within the products we, and our owned or controlled entities, procure due to a combination of industry, geography and product type. Examples are:

- Products manufactured in high-risk countries specific to the healthcare sector (e.g. surgical and examination gloves, surgical instruments) and general veterinary consumables and merchandise (e.g. point of sale items, promotional materials, toys, collars, harnesses, leashes, etc).
- Labour risks associated with sourcing of raw materials including cotton, rubber, nylon, metals and minerals and agricultural supplies
- Packaging materials including pallets, boxes, paper, paper components
- Technology hardware and support services
- Shipping and logistics

Risks may also exist in the operations of suppliers in higher risk services such as facilities maintenance including cleaning, chauffeur services and courier services. We are aware of the existence of these risks based on publications regarding modern slavery risks in certain sectors. There have not been any reports of actual or suspected modern slavery brought to our attention in respect of our supply chains.

5 Actions taken to assess and address modern slavery risks in our operations and supply chain

Our policies

We take modern slavery and human trafficking very seriously and we are committed to maintaining the highest level of integrity, ethical standards, and legal principles in every aspect of our business. We have a number of policies and procedures in place to uphold this commitment.

Code of Business Conduct and Ethics (**Code**)

Our Code requires all employees, executive officers, directors and other third parties acting on its behalf to comply with all laws, rules and regulations. The Code also reaffirms our commitment to equal employment opportunities for our employees, to providing a workplace that is free from discrimination and harassment, and to maintaining a workplace that is safe and healthy.

Supplier Code of Conduct (**Supplier Code**)

We continue to expect our suppliers to conduct their business in a lawful manner and in compliance with the highest standards of integrity and ethics. Our Supplier Code sets out our expectations of suppliers in relation to human rights. It requires suppliers to maintain and promote fundamental human rights, and ensure they provide an environment where employment decisions are based on free choice and do not involve forced or prison labour, physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control. The Supplier Code also prohibits child labour and demands adherence to the minimum employment age limit as defined by applicable laws. In 2021, Covetrus published its first ESG Report, which included the commitments in the Supplier Code.²

We are developing supplier standard terms that require compliance with our Supplier Code.

Remediation

Our employees are encouraged to report any known or suspected violations of law, regulation, or policy via the reporting mechanisms set out in the Code. Grievances can also be raised via our Ethics & Compliance Line (**Hotline**) and is accessible on our website by employees, suppliers, customers and other stakeholders. The Hotline is operated by an independent third party, and is available worldwide 24 hours a day, 7 days of week, via telephone and the internet. Reports can be made anonymously, where permitted by local law. We also have in place additional policies and procedures to protect whistleblowers, including a non-retaliation policy. No reports were received during 2021 that raised concerns in relation to modern slavery.

In the event that our business is found to have caused or contributed to an actual instance of modern slavery, our immediate priority would be the safety and wellbeing of the victim. Specific remediation

² <https://covetrus.com/ESG>.

activities would be determined on a case-by-case basis to ensure the most appropriate and effective actions are undertaken.

Supply chain

All existing suppliers have been given a copy of the Supplier Code and we have sought written confirmation of their adherence to the principles set forth in the Supplier Code. Provet conducts an annual risk review of existing suppliers based on country and category risk.

During the Reporting Period, Provet also conducted a supplier modern slavery risk assessment by reference to a risk matrix resulting in a risk rating of low, medium or high assigned to the direct and indirect suppliers to Provet and PQPL. The risk rating provided to each supplier was informed by a number of factors and datasets, including industry, geographical location from which the goods or services are procured, sector risk and consideration of the extent of our visibility over specific vendor supply chains. In the process, we identified a cohort of high-risk vendors. During the next reporting period, Provet intends to engage with vendors who have been identified as having a high inherent risk profile and reviewing their supply chain controls to assess their true residual risk level once their controls have been applied.

The supplier modern slavery risk assessment was not undertaken in respect of the unique suppliers to PNZ, however, the supply arrangements are very similar to that of Provet and PQPL. Accordingly, it is our view that the modern slavery risks described in Part 4 of this Statement also reflect the supply chain risk of PNZ.

6 Assessing the effectiveness of our actions

Provet is committed to achieving year-on-year improvement in our approach to assessing and addressing modern slavery risks in our operations and supply chains. We will seek to assess the effectiveness of our overall approach by tracking the progress of the following ongoing goals during the second reporting period:

- We will review and update existing policies and procedures, as appropriate, to reinforce our zero-tolerance for slavery and human trafficking;
- We will review whistle-blower reports to assess if they reflect any modern slavery risk in our operations or supply chains;
- We will continue to consider the ways in which modern slavery considerations can be incorporated into our procurement framework and processes, including developing supplier terms;
- We will seek to obtain a deeper understanding of the modern slavery risks beyond the first tier of our supply chain; and
- We will seek to raise awareness of modern slavery within our workforce.

7 Other

During 2021, the COVID pandemic resulted in significant supply disruptions, which limited Covetrus's and their suppliers' ability to assess and monitor ESG risk in their supply chains.

8 Consultation and approval

All the entities that are collectively Covetrus ANZ operate under a common set of Covetrus governance policies and programs. A process of consultation across Covetrus ANZ helped to guide the drafting of this statement. This included engagement with individuals from the following functions (which each have responsibility in relation to each of the Covetrus ANZ entities): Compliance, Legal, Human Resources, Procurement, and Finance. Accordingly, each of the Covetrus ANZ entities were consulted as part of the preparation of this statement.

This Statement has been approved by the principal governing body of Pelican Holdco Pty Ltd on behalf of the Reporting Entities and is signed by its director.

P.P.



Simon Hellams
Director
Pelican Holdco Pty Ltd
29/6/22

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1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1-3
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	3-4
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	4-5
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	5
6. Describe the process of consultation with any entities the reporting entity owns or controls	6
7. Any other relevant information	6