



Modern Slavery Statement 2023

For the year ending 31 December 2023

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ABOUT REAL PET FOOD

CEO Statement

We acknowledge our ongoing responsibility to managing modern slavery risk in our operations and extended supply chain and continue our commitment to complying with the provisions of the Modern Slavery Act 2018.

In 2023 we continued with our program to implement supplier due diligence strategies, building on the solid foundation of the program we started in 2020. We continued to work closely with our priority suppliers to close gaps and jointly develop frameworks to ensure a sustainable and practical methodology for managing modern slavery risks is in place. Additionally we invested in technology partnering to digitise our risk management process.

It is an important part of our philosophy to act ethically and responsibly, and we continue to improve that commitment through our own operations and our procurement and supply chain processes.

This Statement was approved by RPF's Board of Directors in July 2024. The Board will continue to review and update the Statement annually.



We exist to create a world where every pet, every day eats fresher and lives better.



Our Mission and Values

Our mission drives everything we do – from our nutritional philosophy and healthy, delicious dog and cat recipes, to how we source real, fresh ingredients from local farmers in Australia and New Zealand, to our kitchens and cooking facilities, our people and their programs, sustainability and sponsorships.

RPF is the pioneer of fresher pet nutrition. For 30 years we have championed a better way of caring for the health and wellbeing of our pets. Today we have new cooking techniques that allow us to make food that is fresher, less processed, and even unprocessed and raw. And as the science emerges in fresher nutrition, it is beginning to show what we all instinctively know, a fresher diet is better for our loved dogs and cats.

To pioneer and change the way the world feeds their pets, we need to have strong values that support this ambition. At RPF we do. Whether you work with us as an employee, partner, supplier or customer, you will find we live and work by the 4 core values:



Work as a Pack

When we work together, our ideas and execution get better. We are a unique collective of diverse, talented people who think fresher.



Change the Game

Fresh thinking is the cornerstone of being a game changer. We're restless, striving to create a better life for our pets.



Lead with Passion

We're pioneering a new era of pet food. It's our passion. It's why we are leaders in educating the benefits of feeding fresher.



Make your Mark

Here you can do your best work because everyone plays an important role in creating a world where every pet every day eats fresher and lives better.

With these values at the core, we continue to focus on development, meaning, diversity, inclusion and equality. We want our people, and the people in our supply chains and communities to thrive.

Reporting Entity

The RPF Group (“**RPF**”) is a large, global pet food company with the majority of employees in Australia and staff based overseas. RPF is a privately-owned business, with its ultimate holding entity, TopCo Investments Pte. Ltd., incorporated in Singapore. RPF entities covered by this statement are listed below:

Topco Investments Australia Pty Ltd

RPFCBid Co Pty Ltd

RPF (Shanghai) Limited

Topco Investments Pte Ltd (Singapore)

Real Pet Food Company Pty Ltd (ACN 618 564 257)

Game Meat Processing Pty Ltd (ACN 115 499 333)

Australian Pet Brands Limited (ACN 138 614 150)

VIP Petfoods (Aust.) Pty Ltd (ACN 069 880 164)

Consolidated Manufacturing Enterprise Pty Ltd (ACN 135 904 282)

Vet’s Best Products Pty Ltd

Pin Whistle Pty Ltd

People for Pets Pty Ltd

VIP Nominees Pty Limited (ACN 167 475 210)

Swanbrook Road Holding Trust

Vetco Australia Pty Limited (ACN 163 771 640)

Real Pet Food Company (Hong Kong) Ltd

Real Pet Food Company Singapore Pte Ltd

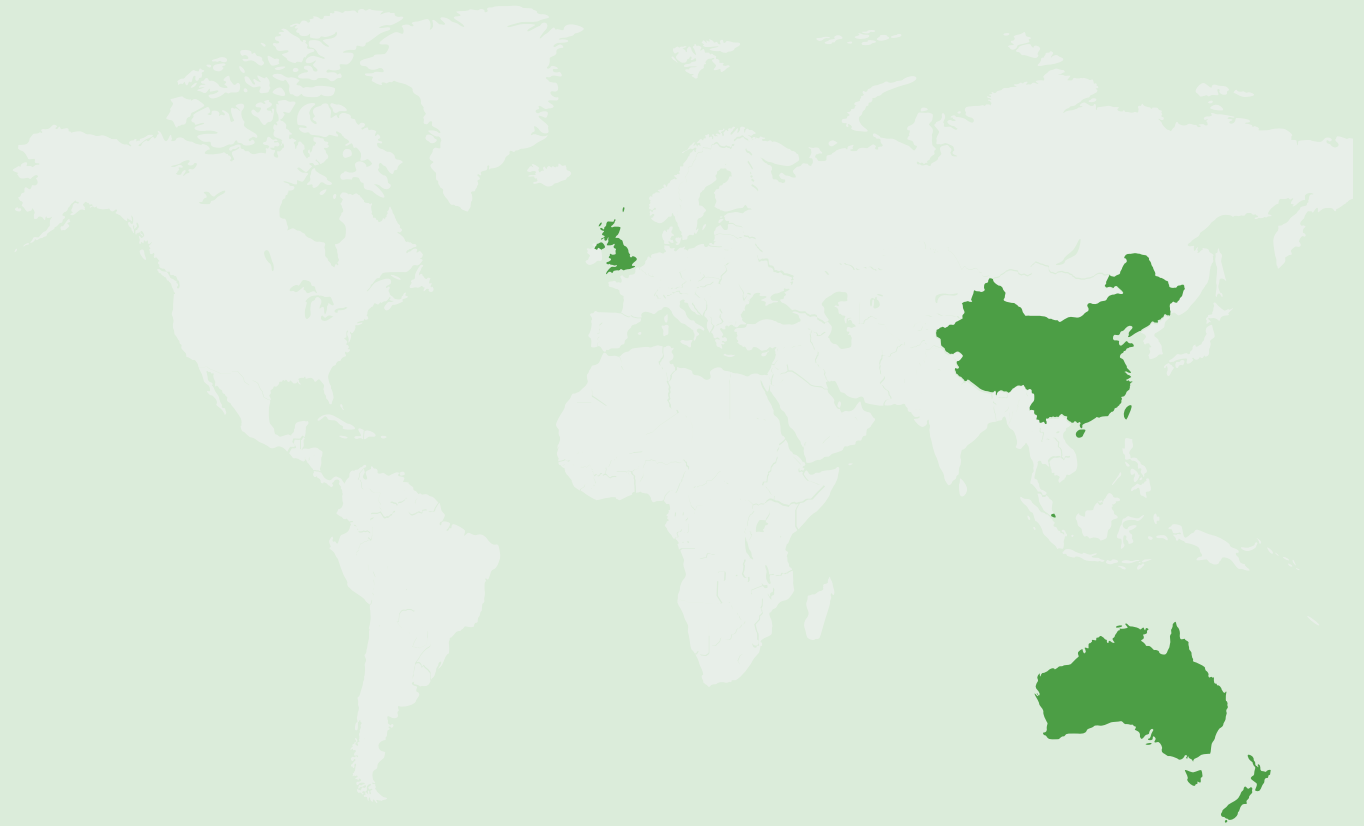
Real Pet Food Company Ltd (NZ)

Real Pet Food Company (Shanghai) Co. Ltd

RPFC Group Limited (UK)

Our Structure

RPF has operations in Australia, New Zealand, China, and UK. The RPF head office is in Crows Nest, NSW, Australia.



Australia

595
Employees

Ingleburn, NSW

158 Employees
Mfg Site

Yatala, QLD

167 Employees
Mfg Site

Dubbo, NSW

78 Employees
Mfg Site

GMP, QLD

70 Employees
Meat Processing Plant

Somersby, NSW

26 Employees
Mfg Site

Crows Nest, NSW

96 Employees
Head Office

New Zealand

100
Employees

Auckland

34 Employees
NZ Head Office

Bombay

60 Employees
Mfg Site

Christchurch

16 Employees
Mfg Site

China

18
Employees

Sales Office

UK

22
Employees

MFG Site/ Sales Office

Singapore

2
Employees

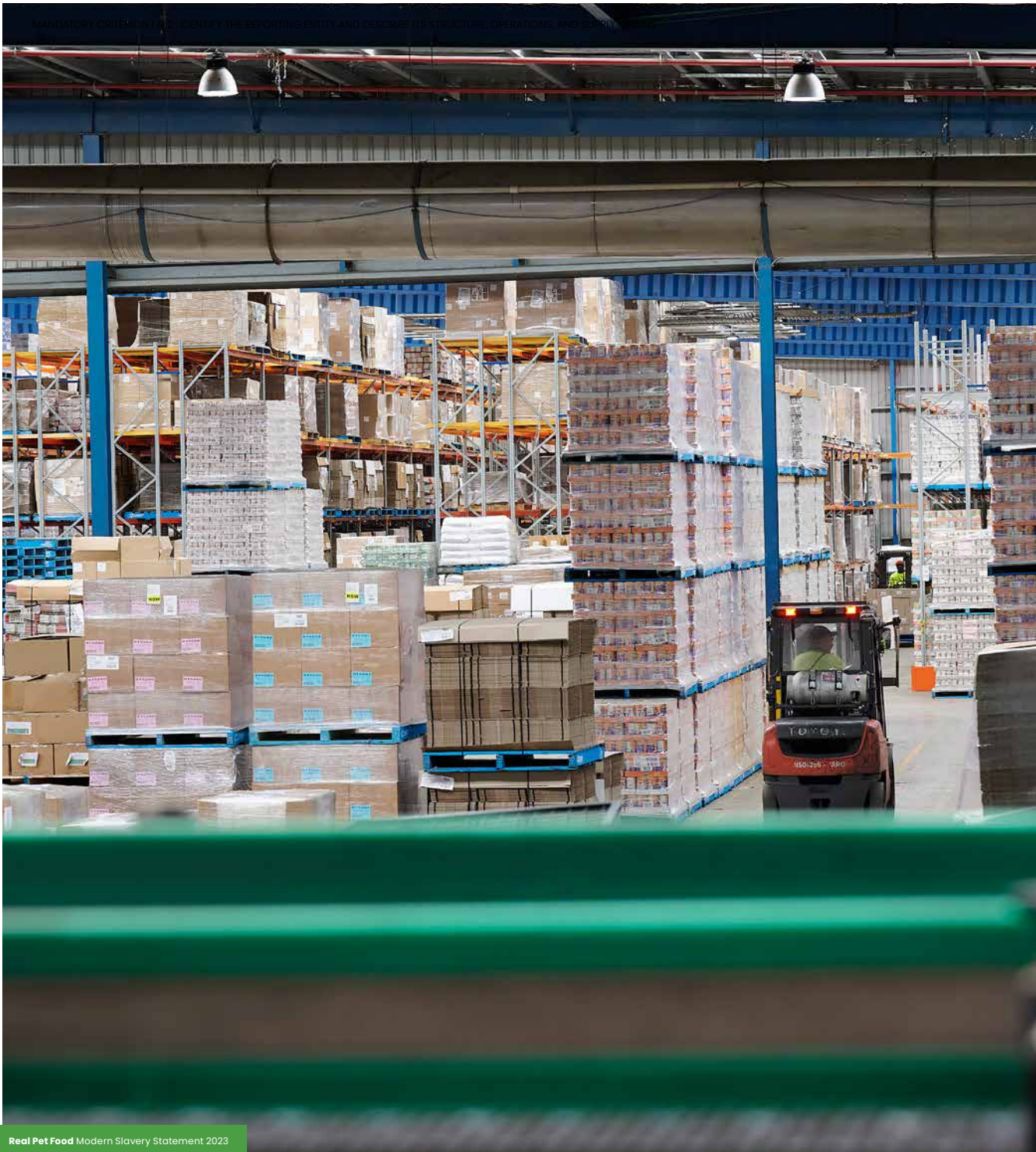
Sales Office

Our Operations

RPF's operations primarily consists of operating pet food manufacturing facilities, including managing, and overseeing the working conditions of our employees. We manufacture and distribute fresh, chilled, dry and wet pet food as well as treats for dogs and cats in Australia, China, NZ, UK, and throughout Asia.

Our operations also include the sale, marketing and distribution of our pet food and related products.





Our Supply Chains

During 2023 we worked to remove complexity from our supply chains as we focussed as a business on simplification principles. This involved, where possible, working to consolidate supply with our preferred suppliers. Our ambition is to partner with a smaller number of suppliers to ensure full transparency across our supply chains. This in turn allows us to focus on the identification of potential risks associated with Modern Slavery and in turn work with these suppliers in a targeted way to reduce these risks.

There have been no significant changes to our preferred supplier list which in turn contributes to being no significant change to the procurement risk profile between the 2022 and 2023 reporting years.

Over 70% of our spend and three-quarters of our suppliers are based in Australia. Our international suppliers are predominantly located in New Zealand, China, Germany, UK, Singapore, Netherlands, Thailand, Italy, Vietnam, and Serbia. The main categories of goods and services procured from our direct suppliers is as per below.

GOODS



**Meats, Poultry/
Seafood**



Food Additives



Agricultural Products



Packaging



Finished Goods



**Oils (Fish, Emu,
Sunflower)**



**Office Furniture/
Fittings/Supplies**

SERVICES



Cleaning Services



**Graphic Design/
Printing Services**



**Transportation
And Logistics**



Machinery



PPE And Clothing



Maintenance Services



Labour Hire



Professional Services

Operational Risks

RPF operates in known high-risk industry sectors such as meat-works, agriculture and food processing. To this end, we are conscious of these risks and take compliance seriously. As a result, given our strict adherence to regulatory requirements, internal policies and governance processes, the risk of modern slavery conditions occurring within our own operations in Australia is relatively low. We acknowledge that there may be risks and vulnerabilities in our operations, particularly where labour hire agencies are used to provide short-term contract and seasonal labour, as well as temporary migrant workers.

RPF also recognises that there are risks of exposure to modern slavery across our business relationships, including our co-manufacturing arrangements and through procurement of goods and services across our extended supply chain. This risk is particularly concentrated from suppliers in countries identified as higher risk for modern slavery.

A comprehensive gap analysis to identify our governance maturity specific to modern slavery has been completed and the timing of the review of this maturity gap analysis is currently being determined.



Supply Chain Risks

During 2023 we continued the work closing the risks identified through our enhanced supplier due diligence program. During the last quarter of 2023, we partnered with a technology provider in order to digitise our due diligence program. As a result of this investment, we are commencing a re-assessment of our supplier base whilst continuing to use our 2020 modern slavery risk prioritisation as a baseline for existing mitigation actions.

With the technology investment, we have commenced the revised risk assessments with the top 50 suppliers defined by spend. Of these top 50 suppliers, which are represented by spend category below, 21 had completed the self assessment as of the end of 2023.

The geographical profile of the respondents listed countries of operation are represented as follows, overlaid with the Trafficking in Persons Report tiers:



Supply Chain Risks

The assessment methodology involves requesting participating suppliers to complete a self-assessment questionnaire online. Subsequent to each supplier completing and submitting their questionnaire, their responses are assessed to determine their modern slavery risk scores and associated risk category against benchmark criteria. Each supplier is then assigned a risk category based on the following table.

		Inherent risk		
		Very high	High to Moderate	Low-risk
Risk control	Adequate	High-risk (high levels of inherent risk)	Low-risk (Adequate risk control)	Low-risk (Low levels of inherent risk)
	Partial		Medium-risk (Partial risk control)	
	Inadequate		High-risk (Inadequate risk control)	

To determine the appropriate risk category, responses are first evaluated for risks inherent to a suppliers operations, production and sourcing. This is referred to as the Inherent Risk Score. This is calculated based on the following four criteria and definitions:



Industry sector

Specific industry sectors deemed as high risk in international and national guidance documentation. This includes sectors with high-risk business models such as use of labour hire workers and outsourcing, seasonality, franchising and aggressive pricing.



Geographic location

Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI and using the SD Strategies country risk matrix which assesses risks against 13 global indices. High risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State's failure to protect human rights. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.



Commodity/product

Specific products and commodities or raw materials deemed as high risk by the US Department of Labor's 2021 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.



Workforce profile

In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where base-skill, vulnerable or migrant labour is used.

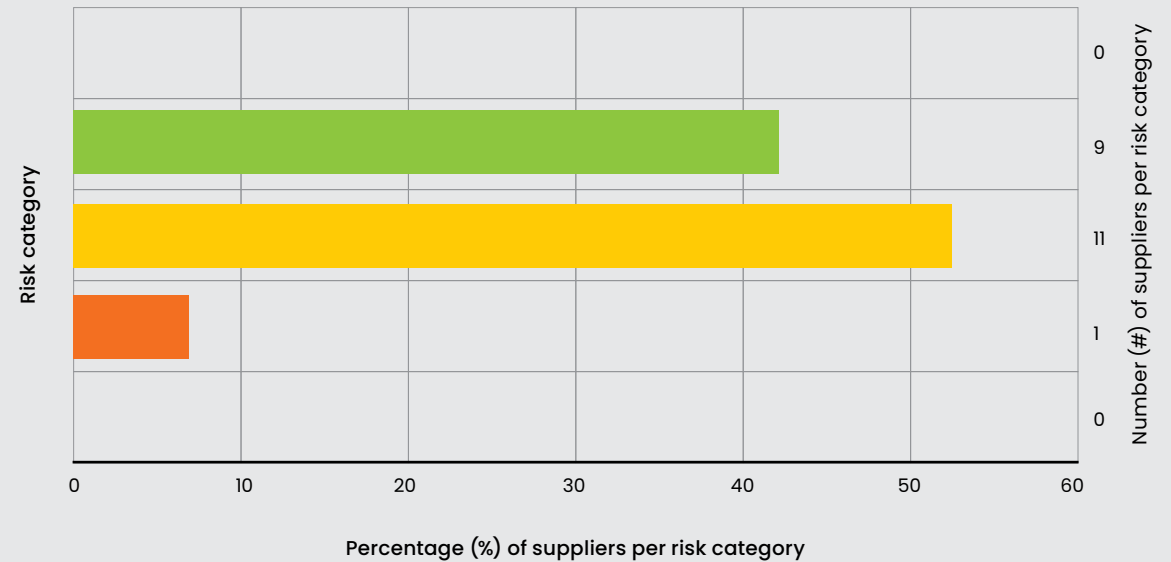
Supply Chain Risks

Following this, the Unmitigated Risk Score is evaluated. This is calculated based on the policy and procedure responses on the questionnaire, demonstrating the level of control over the Inherent Risk towards mitigating that risk. These are categorised as having inadequate, partial, or adequate risk control.

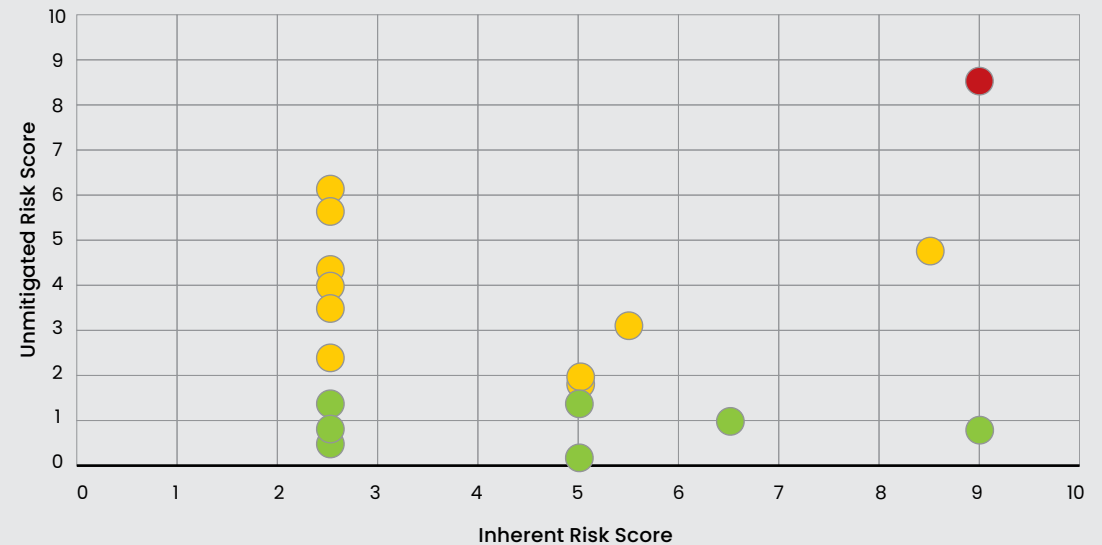
Each supplier is given feedback through the system on the items which require further attention based on their responses to the questionnaire and how mitigating those risks more appropriately would affect the overall risk score.

These are also aggregated, giving RPF visibility over the most impactful actions to undertake to further reduce risk in the supply chain.

Based on the 21 responses received by the conclusion of the 2023 reporting year, the analysis of risk level is per the below graphic. The one supplier classified as High-Risk (inadequate risk control) was deemed such due to level of documentation and has since reduced to Low-Risk (adequate risk control) due to the provision of appropriate supporting documentation.



The below graphic shows the relationship between the Inherent Risk Score and the Unmitigated Risk Score for the respondents.



Tier 2 Supplier Risk

Risk by Category

Working with our Tier 1 (direct) suppliers, we have identified potential modern slavery risks among our Tier 2 (indirect) suppliers. Twenty of the 21 assessed suppliers in 2023 sourced goods from one or more high-risk sectors, which are represented below:

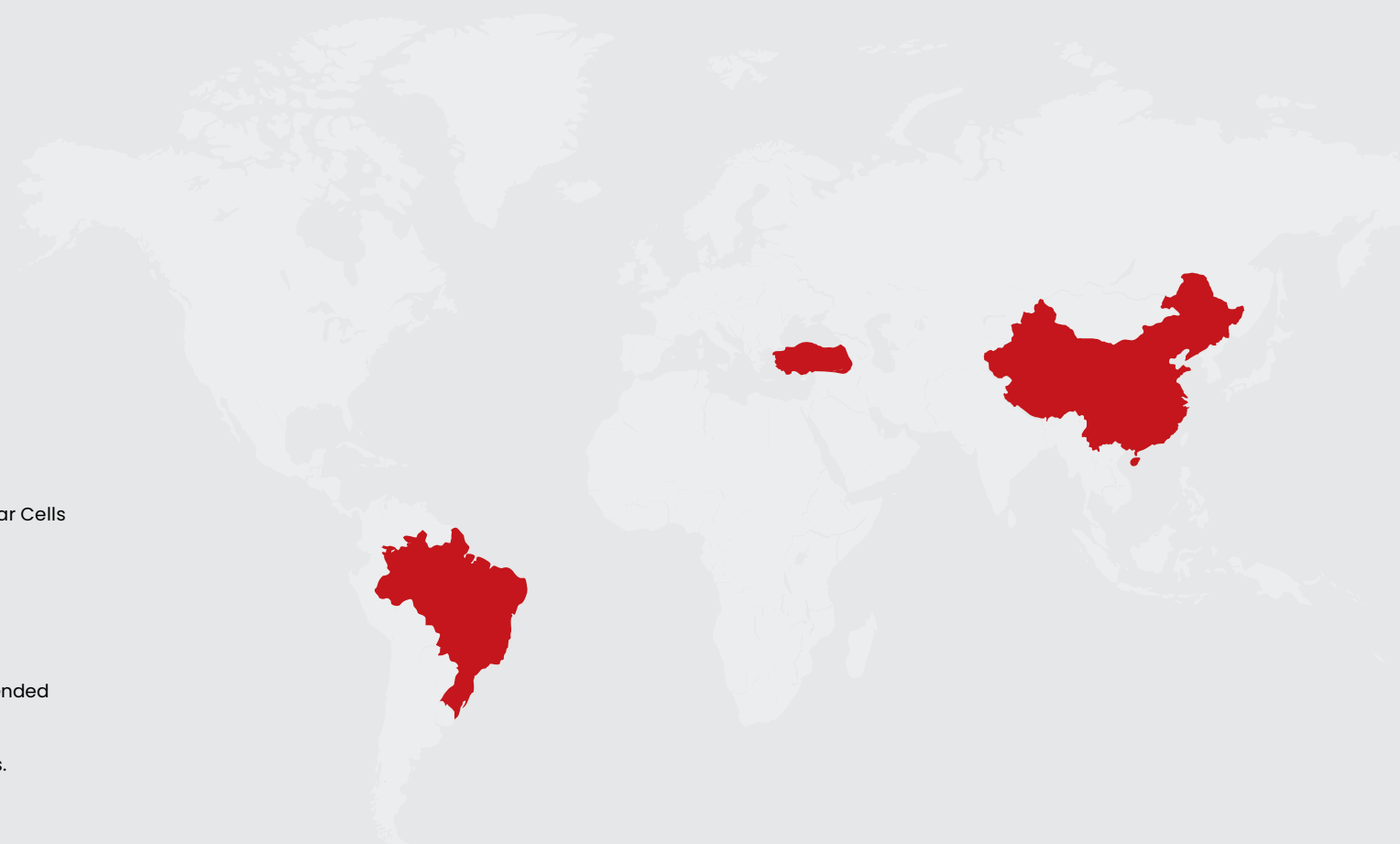
- 13 suppliers sourced goods from 1 high-risk sector
- 5 suppliers sourced goods from 2 high-risk sectors
- 1 supplier sourced goods from 3 high risk sectors
- 1 supplier sourced goods from 5 high risk sectors

These suppliers indicated in a subsequent question, the countries or regions from which high-risk goods are sourced. These combinations are shown below.

- **China:** Aluminium, Footwear, Garments, Gloves, Solar Cells
- **Turkey:** Garments Cells
- **Brazil:** Timber

This initial high-level assessment of our Tier 2 suppliers demonstrates a potential modern slavery risk in our extended supply chain and the importance of engaging suppliers effectively beyond our direct or Tier 1 suppliers when implementing modern slavery due diligence processes.

Note that some suppliers were unable to answer this question and their responses are therefore not represented on this chart.



Actions Taken in 2023

In 2023 we took a number of key actions to assist in addressing the modern slavery risks associated with our operation and supply chains. These include, though are not limited to, the following:



Continued to assess the effectiveness of suppliers addressing Modern Slavery risks as part of the supplier assessment process in procurement exercises.



Began engaging with suppliers on a deeper level regarding Modern Slavery issues including discussions on progress during supplier strategy and business review meetings.



Progressed suppliers on corrective action plans.



Assessed and introduced a technology solution to manage our Modern Slavery effectiveness and assessment capability. This was a key step forward in terms of capturing the assessments of suppliers in relation to their inherent and mitigated risk score as well as action plans and progress against these to determine the improvement in overall mitigation effectiveness of the corrective actions and the highest impact focus areas.

Our modern slavery risk management action plan and due diligence processes will be reviewed regularly as part of our corporate sustainability and risk management reviews. Our risk assessment procedure requires annual review of all risks and controls, including modern slavery risks identified in our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain and continue to work on the best approach to measuring the effectiveness of our actions.

At RPF, we consider an effective response to modern slavery risk management to include:



Strong Modern Slavery Governance

A strong modern slavery governance framework, and commitment to accurately identify and remedy where appropriate, modern slavery vulnerabilities and cases.



Assessment, Management & Reporting

Effective and transparent assessment and reporting of modern slavery risks across our operations and supply chain, including tracking the number of modern slavery risks identified, issuing corrective action requests to our suppliers, and ensuring improvements are implemented.



Engaged Staff and Suppliers

Engaging with our suppliers beyond contractual obligations and awareness of our Responsible Sourcing Strategy. This includes empowering our procurement team members to have the hard conversations with our potentially highest risk suppliers and building trusted relationships to ensure our expectations are met, and corrective action requests are implemented in timeframes acceptable to both parties.

Effectiveness Indicators

In 2023, we assessed the effectiveness of our actions against the following key indicators, both qualitative and quantitative.

Increasing the effectiveness of measurement and assessment of both processes and outcomes indicators remains a priority activity.

Area of Focus	Activity	Qualitative Indicators	Quantitative Indicators
Governance & Policies	<ul style="list-style-type: none"> Continued to assess Modern Slavery risks in Requests for Tender 	<ul style="list-style-type: none"> Standing item in ELT and Board R&S Committee meetings Enhanced understanding and discussion of human rights and labour rights risks and consideration in company decision making Broad agreement across organisation of Responsible Sourcing Strategy and willingness to implement 	<ul style="list-style-type: none"> Number of modern slavery, labour rights and human rights issued raised or questions asked in management meetings Percentage policies reviewed, updated, and integrated Number of contracts with updated Ts & Cs
Risk Management	<ul style="list-style-type: none"> Ongoing risk assessments 	<ul style="list-style-type: none"> Board review and update of risk framework Annual risk appetite assessment completed Increased understanding across workforce on potential modern slavery risks in different operating environments 	<ul style="list-style-type: none"> Number of human rights or labour rights risks identified and documented in risk register Number of risk mitigation actions implemented Number of modern slavery maturity targets achieved
Supplier Engagement & Due Diligence	<ul style="list-style-type: none"> Engaged with suppliers on a deeper level regarding Modern Slavery issues Implemented pilot program of a new technology solution to make assessment and tracking simpler for suppliers 	<ul style="list-style-type: none"> Engagement and education of suppliers Number of highest risk suppliers invited to complete shallow and deep dive assessments Supplier feedback on due diligence process and benefits Percentage of review meetings undertaken Assisting suppliers in completing the SAQ and subsequent action plan 	<ul style="list-style-type: none"> Percentage suppliers engaged and trained Percentage supplier responses to SAQ Percentage suppliers responding to deeper dive assessments Number of corrective action requests issued and completed Number of KPIs included in the SRM program for key suppliers Number of suppliers completing eLearning module
Internal Engagement, Education & Training	<ul style="list-style-type: none"> Employee, management and executive engagement and training 	<ul style="list-style-type: none"> Staff participate in training Enhanced organisational awareness of modern slavery risks – including increased discussion among all personnel Increased Board and Executive interest in and support of modern slavery risk management program 	<ul style="list-style-type: none"> Percentage relevant staff trained Number of Board engagements / presentations in 12 months
Grievances Mechanisms and Reporting	<ul style="list-style-type: none"> Modern Slavery Statement 	<ul style="list-style-type: none"> Whistleblower Policy widely distributed Speak Up platform actively communicated Percentage of issues effectively addressed Alignment of grievance mechanism to UNGPs Modern Slavery Statement submitted on time 	<ul style="list-style-type: none"> Total number of issues raised Percentage of issues effectively addressed Number of stakeholder engagements held on grievance and remedy

All entities under the control of RPF operate under a common governance framework that raises awareness and embeds a consistent approach to addressing modern slavery risks in its operations and supply chains. All entities share the same executive leadership team, who have consulted in and contributed to the drafting of this Statement.



Our Communities

Our pet parents and the communities they live in are the heart of Real Pet Food. In this day and age consumers are spoiled for choice, and as people begin to better understand their pet's health and nutritional needs, our loyal consumer base continues to grow. We want our consumers to know that by choosing Real Pet Food products, they're not only making the best choice for their pets, they're also contributing to initiatives that support people, our pets, and our planet. Our communities play an important role in our lives. This is why we run a Community Grants Program at each of our production sites, to support the communities and people closest to our Pack.

We're working to ensure a future that's cleaner, kinder and safer for everyone and every pet.