



5 December 2023

To whom it may concern,

Modern Slavery Statement 2022-2023

1. Zoetis Australia Pty Limited ACN 156 476 425 and Zoetis Australia Research & Manufacturing Pty Limited ACN 158 433 053 (together, **Zoetis**) are reporting entities within the meaning of the *Modern Slavery Act 2018 (Cth)* (**Act**).
2. On 30 September 2022, Zoetis acquired 100% of the issued share capital of Betrola Investments Pty Ltd, including its wholly owned subsidiary Jurox Pty Limited ACN 000 932 230 (**Jurox**).
3. This joint Modern Slavery Statement is submitted by the entities comprising Zoetis in accordance with section 14 of the Act for the period between 1 July 2022 and 30 June 2023 (**Reporting Period**). For ease of reference, Zoetis and Jurox together are referred to as "**we**" or "**us**" in the remainder of this Modern Slavery Statement.
4. This is the fourth annual Modern Slavery Statement submitted by Zoetis and the first annual Modern Slavery Statement incorporating Jurox.

Background

5. We are actively committed to the prevention and elimination of modern slavery practices in all its forms. During this Reporting Period, Zoetis has continued to advance its efforts in support of this commitment throughout this Reporting Period.
6. The acquisition of Jurox by Zoetis has required the extension of the Zoetis policies and procedures, including the express commitment to good corporate citizenship and respect for human rights (including the Universal Declaration of Human Rights) to Jurox. The integration of Jurox into Zoetis compliance structures is currently ongoing.

The structure, operations and supply chains of the Reporting Entities

Structure

7. The two reporting entities submitting this joint Modern Slavery Statement are wholly owned subsidiaries of their ultimate parent company, Zoetis Inc, which is listed on the New York stock exchange and is the world's largest producer of medicine, vaccine, diagnostic, biodevice and genetic goods and services for pets and production animals, including fish (**Products**).

Operations

8. Members of the Zoetis Inc group sell the Products in more than 100 countries. During this Reporting Period, Zoetis Inc's manufacturing network was comprised of 28 manufacturing sites in 11 different countries. Some manufacturing sites are co-located with research and development operations which allow new Products to be developed and tested before progressing to commercial production.

9. On 9 September 2022, Zoetis Inc completed its acquisition of Jurox, which formulates, manufactures, and distributes companion and commercial animal health Products principally manufactured and developed from its production facility in Rutherford, New South Wales. Jurox's Products are distributed in approximately 22 countries worldwide, including Australia and the United States.
10. Zoetis Inc's Australian presence, through its wholly owned subsidiaries, is comprised of:
 - a. Zoetis Australia Pty Limited, which is Zoetis' primary 'commercial' function, handling areas including Product sales, distribution, marketing, personnel, and operations;
 - b. Zoetis Australia Research & Manufacturing Pty Limited, which has two principal functions. The first is a research function (part of the global research and development function known as Veterinary Medical Research & Development or VMRD) and the second is a manufacturing function (part of the global manufacturing and supply function known as GMS); and
 - c. Jurox, which has historically engaged in a range of functions including research and development, manufacturing, marketing, sales, and operations.

Supply chains

11. Zoetis' supply chains are comprised of:
 - a. Zoetis Inc and its subsidiaries, which is its largest supplier; and
 - b. various domestic and international suppliers.
12. Jurox has maintained its own discrete supply chain which consists of domestic and international suppliers (including some based in China, India, Taiwan and Mexico). The modern slavery risk assessment processes outlined in this statement are being applied to Jurox suppliers with effect from the current reporting period (2024) and will be reported on in the next Zoetis modern slavery statement.
13. All Zoetis businesses in Australia are subject to the global supply policies implemented by Zoetis Inc. With regard to supplies to Zoetis Australian businesses by Zoetis Inc.; Zoetis relies upon Zoetis Inc.'s global policies in relation to modern slavery compliance. Zoetis Inc. has a dedicated compliance function including an internal audit team.
14. Zoetis Inc's primary applicable supply policy is the Corporate Compliance Program. The Corporate Compliance Program contains several important mechanisms and policies relevant to modern slavery compliance. Some of those mechanisms and policies, which we explain below, include:
 - a. the Global Code of Conduct (**Global Code**);
 - b. the Global Compliance Helpline; and
 - c. the ongoing live and online compliance education program (**Education Program**).
15. Firstly, the Global Code details Zoetis Inc's, and therefore our, corporate philosophy and prescribes non-negotiable, minimum standards of compliance which it applies to all its suppliers. The Global Code:
 - a. prescribes global compliance structures and procedures;

- b. identifies applicable laws and the underlying corporate principles and ethics common to all 'Zoetis group' companies;
 - c. provides an express statement (in the 'Human Rights' section) with respect to our commitment against modern slavery, child labour, human trafficking, and forced labour; and
 - d. clarifies Zoetis Inc's global ethical stance with respect to other human rights-based issues including anti-bribery, corruption, equal opportunity, and workplace bullying/violence.
16. Secondly, the Global Compliance Helpline acts as a confidential whistle-blowing resource that allows employees globally to report on possible or suspected violations of the Global Code, applicable laws, or any other relevant policies (as determined by country of operation). The Global Compliance Helpline:
- a. maintains an "Open Door Policy" which encourages employees to raise concerns to any relevant department, without fear of retaliation;
 - b. provides a means for employees to get information or receive advice anonymously; and
 - c. is operated by third party ethics and compliance representatives, which provide summaries of all reported calls to the Chief Compliance Officer for assessment or any other appropriate further action. Zoetis Inc's Chief Compliance Officer is responsible for overseeing the compliance with the Corporate Compliance Program. Part of the Chief Compliance Officer's role includes responsibility for training, monitoring systems, developing international resources, and investigating potential violations of company policy or applicable laws.
17. Thirdly, Zoetis Inc's Education Program ensures that all employees have access to an intranet site which contains the company's global policies, including the Global Code. On some subjects, all Zoetis Inc employees (including contingent workers or contractors) are required to complete online annual training and additional specific training as warranted.
18. We remain bound by the above ethical policies and resources, in addition to our own domestic efforts to assess, address, and respond to any modern slavery risks. The integration of Jurox into the 'Zoetis group' has included the application of Zoetis Inc's global policies to this newly acquired business. Jurox management are required to report to Zoetis management, including with regard to compliance with global and local Zoetis policy.

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls

19. Throughout this Reporting Period:
- a. Zoetis has continued to develop its risk-assessment methodology over new and existing suppliers; and
 - b. Jurox has commenced implementation Zoetis' risk-assessment methodology internally.
20. Our risk assessment process now involves:
- a. compiling an exhaustive list of suppliers across each of our departments and functions;

- b. applying the below risk-based criteria to each supplier; and
- c. categorising each assessed supplier into low, medium, or high-risk suppliers.

21. We step through each process of the above risk assessment process as follows.

Step 1: Mapping our supply chains

22. In the 2023 reporting period Zoetis has 304 suppliers in total, including suppliers that are related bodies corporate. During this Reporting Period:
- a. Zoetis engaged less than 20 new suppliers; and
 - b. Jurox engaged less than 20 new suppliers.
23. Given that this is Jurox's first time as being part of a Modern Slavery Statement, it is still in the process of preparing the resources and processes necessary to allow it to identify its new suppliers moving forward and to apply Zoetis compliance procedures to those suppliers. Jurox currently has less than 20 suppliers.

Step 2: Applying our risk assessment criteria

24. We are committed to ensuring that our business considers the diverse factors which may inform risks of modern slavery practices. We set out some of the factors which we consider in applying our risk assessment of suppliers as follows.
25. Firstly, we recognise that **geography** has a material impact on any supplier's modern slavery risks. These risks may be informed by, among other things:
- a. the extent to which the supplier's geographic location is subject to, has implemented, or enforces, international human rights and instruments;
 - b. whether, and to what degree, the supplier's geographic location has implemented, and enforces, domestic human rights legislation;
 - c. the degree of regulatory transparency in the supplier's geographic location with respect to human rights violations, the rule of law, and corruption; and
 - d. whether the supplier's jurisdiction is subject to known conflict, corruption, or civil strife.
26. Secondly, we recognise that the **industry** in which the supplier operates will contribute to the risk of modern slavery practices in that supplier's operations or supply chains. These risks may be informed by, among other things:
- a. the existence of any labour laws applicable to that industry of operation;
 - b. the strength and degree of any regulatory oversight with respect to that industry;
 - c. whether the relevant market is known for use of unskilled, seasonal, or temporary labour, or the engagement of migrants or any vulnerable communities;
 - d. whether the products produced by that supplier, or in that industry, may be sourced or derived from components or materials obtained from other industries with ineffective or non-existence regulations; and

- e. whether that particular industry has been subject to any international reviews, discussion papers, or coverage, published by any NGOs, or international human rights bodies, with respect to human rights violations.
27. Thirdly, we recognise that the **size** of a supplier may play a role in the degree of modern slavery risk presented by a supplier. This metric acknowledges that, generally, smaller suppliers may be susceptible to modern slavery risks due to less interaction with governance or regulatory bodies, with less exposure to detection.
 28. We intend to further expand the scope of our risk assessment over successive Reporting Periods, so as to ensure that our criteria is reflective of the various factors which may underpin risks of modern slavery. This includes (for the 2024 reporting period) screening Zoetis's suppliers through the World-Check record, which is a database run by Refinitiv (a subsidiary of Thomson Reuters) in its capacity as one of the world's largest providers of financial markets data and infrastructure (Refinitiv Screening). This process will highlight any public ethical or compliance issues with regard to the supplier database.

Step 3: Categorising each supplier into tiers of risk

29. Most of Zoetis' suppliers engaged are either:
 - a. professional service-providers hired on an ad-hoc basis;
 - b. research facilities and clinical trial service providers; or
 - c. utilities-providers used in the manufacture, storage, or transport of the Products.
30. From Zoetis' risk assessment, Zoetis concluded that most of its service-based suppliers present a relatively low risk in relation to modern slavery because:
 - a. many of these service-based providers are located in regions subject to regulatory and legal oversight, domestic human rights legislation and/or international human rights regimes, including Australia, the United States, Switzerland and Belgium; and
 - b. the services supplied typically exclude the use of unskilled, temporary, or seasonal labour and are primarily of a technical or corporate nature, such as telecommunications services, employment and recruitment services, and clinical trial services.
31. After conducting its risk assessment of its physical products, and utilities, Zoetis identified that its suppliers providing clothing/promotional items may bear comparatively higher risks of modern slavery than other suppliers. Zoetis' reasoning for this conclusion was that:
 - a. the suppliers of such products are based in jurisdictions with varying levels of regulatory and legal transparency with respect to human rights laws and labour laws; and
 - b. suppliers which specialise in the production of low-value goods may be prone to greater risks of using unskilled, seasonal, or temporary labour, or sourcing products or components from other industries with a high risk of modern slavery practices.
32. We acknowledge that assessing modern slavery risks requires an informed and multi-faceted approach. This approach should be able to consider the particulars of

each supplier, guided by an overarching understanding of the various factors which influence modern slavery. Over successive Reporting Periods, we intend to consider:

- a. how the addition of Jurox into the 'Zoetis group' may impact the scope of our risk-assessment and the factors which we consider in conducting that risk-assessment; and
- b. how we may be further allocate greater scrutiny and attention to higher-risk suppliers; and
- c. any suppliers flagged by the Refinitiv screening process currently being rolled out by Zoetis.

Describe the actions taken by the Reporting Entities and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.

33. Our resolute opposition to modern slavery is a foundational aspect of our approach to conducting business and functioning as a compliant corporate citizen.
34. A key focus for us during this Reporting Period was considering how, in future Reporting Periods, we can adapt our strategies and processes to include a greater emphasis on remediation and due diligence.
35. Some of the measures which we have taken throughout this year are listed below.

Modern Slavery compliance meetings

36. Zoetis' cross functional management team for modern slavery risks, which includes its Senior Legal Director, conducts an annual review of modern slavery compliance within Zoetis. This management team has convened these annual modern slavery compliance meetings since Zoetis' first Reporting Period under the Act.
37. This team met on 7 March 2023 to assess the status of its existing compliance activities and policies and consider what further compliance activities and policies could be implemented over future Reporting Periods. This modern slavery compliance committee has allowed Zoetis to open channels of communication across Zoetis' internal functions and assess the effectiveness of measures implemented.
38. Following Zoetis' acquisition of Jurox, Zoetis and Jurox have established internal contact points to liaise on all issues of modern slavery so that, throughout successive Reporting Periods, we can all apply a consistent and uniform approach to modern slavery.

Policy review

39. In this Reporting Period, Zoetis conducted a comprehensive review of its template documents and agreements which Zoetis uses when engaging or otherwise interacting with its suppliers. Some of these documents and agreements include contractor agreements, service agreements, and purchase agreements.
40. Where appropriate, these documents and agreements were revised to:
 - a. make express mention to the Act and Zoetis' obligations under the Act;
 - b. require the relevant supplier to warrant and represent compliance with the Act; and

- c. establish reporting obligations in the event of that supplier's non-compliance with the Act.
41. This policy review has allowed Zoetis to further strengthen the consistency of its approach to modern slavery issues and increase the scope of its reach into suppliers' respective operations and supply chains.

Modern Slavery Bulletins

42. During this Reporting Period, Zoetis continued its practice of circulating educational email bulletins to its employees.
43. During this Reporting Period, our bulletins:
- a. defined modern slavery and described its various forms;
 - b. reinforced Zoetis' resolute position against modern slavery practices; and
 - c. encouraged employees to report any potential or known instances of modern slavery practices within the Zoetis supply chain to the Global Compliance Helpline.
44. The purpose of these bulletins is to, among other things, spread internal awareness of the Act and its principles, and to promote a corporate culture which aligns with Zoetis' corporate values of respect for human rights and compliance with the Act.
45. Jurox is considering implementing a similar bulletin system in the next Reporting Period.

Modern Slavery Questionnaire

46. After conducting the risk assessment of its suppliers (referenced in paragraphs 22 to 32), Zoetis issued its Modern Slavery Questionnaire to 24 suppliers. Jurox has issued questionnaires to its supplier base.
47. Zoetis' Modern Slavery Questionnaire contained 21 questions:
- a. designed to assess that responding supplier's human rights and labour standards;
 - b. required responding suppliers to report on the actions taken by that responding supplier during that Reporting Period in relation to the prevention or addressing of modern slavery risks; and
 - c. and required responding suppliers to report on any actions taken to ensure compliance with the Act among suppliers in the supplier's own supply chains.
48. At the end of the Reporting Period, Zoetis had received 8 completed responses from Zoetis suppliers responding to the Modern Slavery Questionnaire. Jurox has received 3 responses to date. All of the responses received by Zoetis in relation to its Modern Slavery Questionnaire satisfied Zoetis that modern slavery risks are being adequately managed by those suppliers.
49. Zoetis will follow up with the remaining suppliers to obtain the responses requested.

Australian Supplier Code of Conduct

50. During the 2021-2022 Reporting Period, Zoetis introduced an Australian Supplier Code of Conduct (**Australian Code**) to supplement the Global Code. That Australian

Code was published on Zoetis' website and highlighted Zoetis' corporate values and non-negotiable minimum standards to which Zoetis expects all suppliers to adhere.

51. Following Zoetis Inc's acquisition of Jurox, Jurox adopted the Australian Code and posted a copy of that Australian Code on the public facing Jurox website. Jurox's adoption of that Australian Code is an important step in the alignment of values between Zoetis and Jurox.
52. The Australian Code makes express reference to the Act and details our corporate commitment to compliance under the Act and our requirements of suppliers. Some of these requirements include the promotion of compliance among each supplier's own supply chains, and the requirement to report any instances of non-compliance to us.

Describe how the reporting entity assesses the effectiveness of such actions

53. The quality control process for procurement is well established and supported by audits, either by external regulators or Zoetis's own internal audit team. This quality control process is now available to Jurox as a recent addition to the 'Zoetis group'.
54. Over the coming Reporting Periods, Zoetis and Jurox intend to assess, on an ongoing basis, further means by which Zoetis and Jurox may implement proactive steps in detecting, remedying, and combatting any modern slavery practices in their, or their suppliers', supply chains and operations.

Describe the process of consultation with the entities giving this statement

55. As set out earlier in this Modern Slavery Statement, both the Reporting Entities are wholly owned subsidiaries of their ultimate parent company, Zoetis Inc. As we are all part of the 'Zoetis group', we have made active attempts throughout this Reporting Period to cross-integrate our policies, systems and processes. This has included establishing specialised contact points in Zoetis and Jurox for all modern slavery-related matters, the application of Zoetis policies at Jurox, and consultation in the preparation and finalising of this Modern Slavery Statement.
56. A Jurox representative has now joined the cross functional management modern slavery compliance meetings. As Zoetis and Jurox continue this process of integration over successive Reporting Periods, it is intended that these lines of dialogue and consultation will allow Zoetis and Jurox to apply a consistent approach to modern slavery.

Conclusion

57. Zoetis is continually assessing how it can develop and enhance its policies with respect to modern slavery. The acquisition of Jurox presents a meaningful opportunity for the Reporting Entities authoring this joint Modern Slavery Statement to share and consolidate their approaches.
58. In the current reporting period Zoetis is implementing World-Check record, a database run by Refinitiv (a subsidiary of Thomson Reuters). This is to provide a further objective data to inform the internal supplier risk assessment process.
59. We are proud of the progress achieved during this Reporting Period and the opportunity to further advance the fight against modern slavery over future Reporting Periods.

Yours sincerely

Mark Worsman

Mark Worsman
Senior Director, Legal

This statement was created at the direction of the boards of each of the reporting entities covered by this statement. The boards gave that direction and the report was completed and approved in December 2023.

Lance Williams

Lance Williams, Director