

Responsible Sourcing and Human Rights Policy

March 2024

1. Scope

This policy applies to Petstock Group team members, suppliers, contractors, third parties to Petstock Group and the facilities that it manages (business partners). It sets out our commitment to respect internationally recognised human rights standards and ensure sourcing practices are ethical, safe and sustainable.

This commitment underpins the Petstock Group Vision: Together, we make an impact for people, pets and the planet and is embedded through all business functions.

The Petstock Group is made up of Petstock Pty Ltd (ACN 098 394 588) and all other entities over which Petstock Pty Ltd has control of, including its controlled entities, businesses, related brands and digital services in Australia and New Zealand.

2. Purpose

The Petstock Group acknowledges its responsibility to sourcing materials, products, and services in a manner that minimises negative social and environmental impacts and promotes positive outcomes for workers, communities, and the environment.

We seek to establish relationships with business partners who share the same principles and values as the Petstock Group. Therefore, we expect our team members and business partners of both goods and services, to act in accordance with this policy and to demonstrate good business practice. We expect our suppliers to cascade these requirements throughout their supply chain.

We have an established governance processes and policies to help us to implement and adhere to international standards related to responsible sourcing and human rights across the Petstock Group.

3. Policy Principles

Our Policy is based on international environmental and labour standards **and contributes to achieving key targets of the Sustainable Development Goals**. It embraces and reflects **United Nations Guiding Principles on Business and Human Rights (UNGPs)** principles relating to human rights, labour standards, the environment and business integrity and is consistent with the **United Nations Declaration of Human Rights**.

At a minimum, this means Petstock commits to respecting the rights set out in the *International Bill of Human Rights* and the principles concerning fundamental rights set out in the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work* and the *UN Guiding Principles on Business and Human Rights*.

This commitment means it is our responsibility to protect and respect human rights and undertake ongoing due diligence activities to identify, prevent and mitigate adverse human rights impacts derived from our internal and external operations. The UNGPs acknowledge

the interconnectedness between environmental sustainability and human rights through supply chain responsibility.

We uphold and expect our business partners to commit to respecting each of the **International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights of Work and related core conventions**. This includes: the right not to be subject to forced labour, child labour or discrimination in respect of employment and occupations; and freedom of association and the right to collective bargaining.

We hold our team members and business partners, whose own impacts may be directly linked to our operations, products or services accountable for respecting human rights. Where human rights are not respected or violations occur according to international standards, we will take appropriate action in response.

4. Our Approach

4.1. Responsible Sourcing & Human Rights Due Diligence

The UNGPs set out the key elements of human rights due diligence, including assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

We understand that human rights due diligence and supply chain responsibility is an ongoing process. We commit to continuously improving our systems and controls to identify and assess our human rights risks and integrate those findings to manage them effectively.

We are committed to track the effectiveness of our responses and to communicating our human rights progress including through our annual modern slavery statement, made in accordance with the Modern Slavery Act 2018 (Cth).

4.2. Governance and oversight

We recognise that our business partners operate within a number of diverse legal frameworks and operating environments globally. We also recognise that we need to continuously monitor our approach to human rights and responsible sourcing.

We have an established governance processes and policies to help us manage this risks across the Petstock Group. Our Modern Slavery Framework allows us to focus on the identification, assessment, and mitigation of human rights risks in our supply chain and operations. This framework has oversight by the Modern Slavery Steering Committee and consists of key factors including governance, risk assessment, embedding due diligence, training, monitoring and reporting. We use this framework to identify ways in which to improve our approach.

Periodic reviews will be used to track the effectiveness of this policy or when circumstances dictate; for example, to align with changes in regulations or address emerging issues.

Following periodic policy reviews, any updates to the Policy will be communicated to all relevant team members and business partners.

4.3 Grievance Mechanisms

In order to address concerns, we encourage open feedback and communication. We consistently evaluate our supplier relationships and advocate for **transparency** and open

communications. Our commitment is to collaborate with our suppliers, influencing the development of improvement strategies and assisting them in achieving compliance.

If a team member or supplier becomes aware of a potential breach of this policy they can confidentially raise a complaint, report and impact or concern about a breach of this Policy using our grievance mechanisms, [Speak Up Policy](#). Concerns can be raised confidentiality and anonymously.

Our suppliers are expected to have their own effective grievance mechanism which embeds the UNGP's eight effectiveness criteria for company grievance mechanisms. In alignment with these criteria and to promote a robust grievance process, suppliers shall also make available the Speak Up Policy as a complimentary channel available for all workers in our supply chains to raise concerns.

4.3.1 Breach of Policy

We are committed to working collaboratively with our team members and business partners to find workable solutions to enable compliance with this policy when required.

A breach of this policy by a team members may result in disciplinary action, which will be determined as appropriate to the circumstances of the non-compliance. Deliberate or wilful non-compliance is considered to be particularly serious.

If a supplier is unwilling to work with Petstock Group to address issues when complying with this policy and/or fails to show improvement, we reserve the right to review the suitability of its ongoing relationship with that supplier. This may result in termination of contracts.

We are committed to continuously improving our grievance mechanisms and remediation processes through stakeholder engagement and dialogue, to align with the effectiveness criteria set out in the UNGPs.

4.4 Continuous improvement

This policy was developed and reviewed by the Petstock Working Group and approved by the Petstock Steering Modern Slavery Committee and Petstock Board.

Petstock is committed to continuously improving our human rights policy and approach by monitoring and evaluating this program on a regular basis and working with team members and business partners.

For further information email planet@petstock.com.au

4.5 Policy and related documents

This policy is shared with team members and business partners during onboarding and forms part of their contract of doing business with us, including the requirements that supplier communicate this Policy to their own suppliers and/or contractors and extend the principles of this Policy throughout their supply chain and/or operations.

This Policy is also shared with our ecosystem partners, with a clear expectation that they comply with it as a core Petstock Group commitment. There are other documents and

policies which operate in tandem with, or complement, this Policy. These documents and policies include:

- Modern Slavery Statement
- SpeakUp Policy
- Supplier Code of Conduct
- Petstock Code of Conduct
- Supplier Terms and Conditions