

Modern Slavery Policy

PURPOSE

The Cenversa Group¹ recognises that modern slavery² is an international issue that requires a united approach to bring under control and eradicate. As a group, we are committed to working with our supply chain partners and various stakeholders to achieve our common goal.

If the policy is breached, we will act swiftly as possible to resolve any adverse impacts on individuals or communities involved.

The Australian Modern Slavery Act 2018 took effect on 1 January 2019 and requires the Cenversa Group to make annual returns (Modern Slavery Statements) on the actions of its businesses to address modern slavery risks in their supply chains.

The purpose of this Policy is to ensure that the Cenversa Group:

- Respects and adheres to all local, federal laws and regulations in the countries in which the businesses operate;
- source products and services in accordance with legal obligations and partner with suppliers³ to ensure good governance throughout the supply chain;
- act to prevent, mitigate and where required, remedy modern slavery in their operations⁴ and supply chains⁵.

POLICY APPLICATION

The principles of this policy must be complied with or incorporated into policies within the Cenversa Group (as applicable).

POLICY

- a) Each subsidiary/business unit must adopt policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for the relevant subsidiary/business unit.
- b) Each subsidiary/business unit must, as far as practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all local, national, and other applicable laws and regulations in the areas in which they operate.
- c) Each subsidiary/business unit must, as far as practicable, use in its operational and supplier contract terms requirements that suppliers:
 - (i) comply with the Minimum Standards set out in Annexure A (Minimum Standards);
 - (ii) provide the subsidiary/business unit with rights of termination if the supplier is unable or unwilling to work towards full compliance with the Minimum Standards.
- d) As far as practicable, suppliers must be:
 - (i) encouraged to exceed the Minimum Standards, and promote best practice and continuous improvement; and
 - (ii) monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate for the subsidiary/business unit, considering all relevant risk factors such as country risk and product risk.
- e) Each subsidiary/business unit must monitor and review the effectiveness of the policies and procedures referred to in paragraph (a) above, considering their suitability, adequacy, and effectiveness as per the risk assessment.
- f) Each subsidiary/business unit must implement an approach to modern slavery risk management in accordance with the guidelines in Annexure B.

POLICY AMENDMENT

This policy cannot be amended without approval of the Cenversa Board. The Cenversa Board is responsible for oversight of the company's modern slavery commitments and will review this policy regularly to ensure it continues to evolve and reflect community expectations.

LAST AMENDED

April 2022

¹ The Cenversa Group means Cenversa Ltd and its wholly owned subsidiaries including Cenversa Services Pty Ltd, Cenvet Australia Pty Ltd, Central Pet Pty Ltd and Veterinary Companies of Australia Pty Ltd. ² Modern slavery is defined in the Modern Slavery Act 2018. ³ 'Suppliers' is defined as manufacturing facilities, supplier workplaces and vendors of goods or services to Cenversa and its subsidiaries. ⁴ 'Operations' is defined as activity controlled by Cenversa and its subsidiaries/business units. ⁵ 'Supply chains' is defined as suppliers and Service Providers to Cenversa and its Subsidiaries/business units.

Annexure A - Minimum standards expected of suppliers

Minimum Standards

No forced or bonded labour

Employment shall be freely chosen. Suppliers shall:

- a) not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), bonded labour (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion);
- b) respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment; and
- c) ensure that workers are free to leave their employer after reasonable notice.

No child labour⁶

Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation⁷ of child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.

Wages, benefits, and transparent record keeping

Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.

Working hours

Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.

No discrimination

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination, or any other inappropriate workplace behaviour.

No harassment or abuse

Workers shall be treated with dignity and respect. Suppliers will provide a workplace free from harassment, including physical, sexual, verbal, or visual behaviour that creates an offensive, hostile, or intimidating environment.

⁶ 'Child labour' is defined as any work by a child or young person, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to interfere with that person's education, or to be harmful to that person's health or mental, spiritual, moral or social development. 'Child (or Children)' is defined as a person under the age of 15, or below the age at which school attendance is not compulsory under local law, whichever is older. 'Young Person' is defined as a person under the age of 18 but not classified as a child. ⁷ Principles of remediation is defined as a program enabling children and under age workers to return to quality education and establish and implement effective systems to prevent the use of child labour in the future.

Freedom of association, grievance mechanisms and recourse

Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, if such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing. Suppliers should not interfere with, obstruct, or prevent legitimate related activities, such as collective bargaining. Workers can select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process to address grievances and other issues.

Suppliers must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.

Working conditions

Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied, and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe, and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.

No bribery

Bribes, favors, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.

Sub-contracting

Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that sub-contractors operate in accordance with this and any applicable divisional/business unit policy, and is undertaken strictly in accordance with the contract.

Environmental compliance

Suppliers shall comply with relevant local and national environmental protection laws and will as far as practicable comply with international environmental protection standards.

Animal welfare

Suppliers must ensure animals are treated humanely and with respect.

Migrant workers

Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third-party agent or contractors are the responsibility of the suppliers and are thus covered by these Minimum Standards.

Hiring and regular employment

Suppliers must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements, and conditions. In addition, where possible, suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.

Annexure B - Modern slavery risk management for each subsidiaries/business unit

Minimum Standards

Accountability for modern slavery issues, with an identified risk owner	Subsidiaries/business units acknowledge that they are accountable for addressing modern slavery issues in operations and supplier contracts and will nominate a specified individual or role to be responsible for co-ordinating management of this risk.
Supply chain mapping and risk assessment	Subsidiaries/business units must assess the risks of modern slavery across their operations. The risk assessment must initially address the modern slavery risks of tier 1 suppliers ⁸ and then assess those suppliers beyond tier 1 who are determined by the subsidiary/business unit to be high risk.
On-boarding and contracting	Subsidiaries/business units must perform due diligence on new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business. The subsidiary/business unit must have a process in place to consider the supplier's ethical sourcing and modern slavery performance during the supplier on-boarding.
Training	Subsidiaries/business units must assess suppliers through their audit/compliance program to confirm compliance with this policy. The subsidiary/business unit should involve relevant personnel or external providers trained in conducting audits when required.
Complaints mechanism	Subsidiaries/business units must have an accessible and well-publicised reporting mechanism for concerns or disclosure in relation to modern slavery which allows for confidential and anonymous reporting and provides protection from reprisal. There must be clear processes for investigating and reporting on the issues raised through the reporting mechanism.
Remediation	Subsidiaries/business units must be committed to working with suppliers to remediate any breaches of this policy.
Stakeholder engagement	Subsidiaries/business units must have an approach to stakeholder engagement in place.
Review	Subsidiaries/business units must monitor and annually review the effectiveness of the risk management measures described above.

⁸ 'Tier 1 suppliers' are defined as those suppliers that supply goods or services directly to our subsidiary/business unit.