



Modern Slavery

Statement 2022 | For the year ending 31 December 2022



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CEO Statement

We acknowledge our 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 2022 we continued with our program to implement supplier due diligence strategies, building on the solid foundation of the program we started in 2020. We worked 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.

It is part of our ethos to act ethically and responsibly, and we continue to improve that commitment through our own operations and our procurement and supply chain processes. We aim to produce Real Food, driven by Real Ethics.

This Statement was approved by RPF's Board of Directors in July 2023. The Board will review and update the Statement annually.

Our Values and Behaviours

We're driven by our vision to inspire pet parents to choose all that is fresh, natural and real. We're innovators, passionate about pets, and unwavering to our commitment to Be Real. Eat Real. Live Real... but what does that mean?

Be Real – At our core, we're a team of people who share a passion for giving our pets our all, knowing that they show up and do the same for us each and every day.

Eat Real – Nutrition is crucial to pets' overall health. We're transforming the way we feed our pets, helping furry family members grow stronger and play longer.

Live Real – We know what it means to be a pet parent and the joy pet ownership brings to people across all walks of life. We're there through it all, the highs and the lows, and we support our Real Pet family in building meaningful community partnerships that allow us to give back to those who need it most.



Reporting Entity

RPF Group is a large, global pet food company with most employees in Australia and a small number of staff based overseas. RPF Group is a privately-owned business, with its ultimate holding entity, TopCo Investments Pte. Ltd., incorporated in Singapore. RPF Group entities covered by this statement are listed below:

Topco Investments Australia Pty Ltd

RPF CBid 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 Pty Ltd (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

Swanbrook Road Holding Trust

Vetco Australia Pty Limited

Real Pet Food Company (Hong Kong) Ltd

Real Pet Food Company Singapore Pte Ltd

Real Pet Food Company Ltd (NZ)

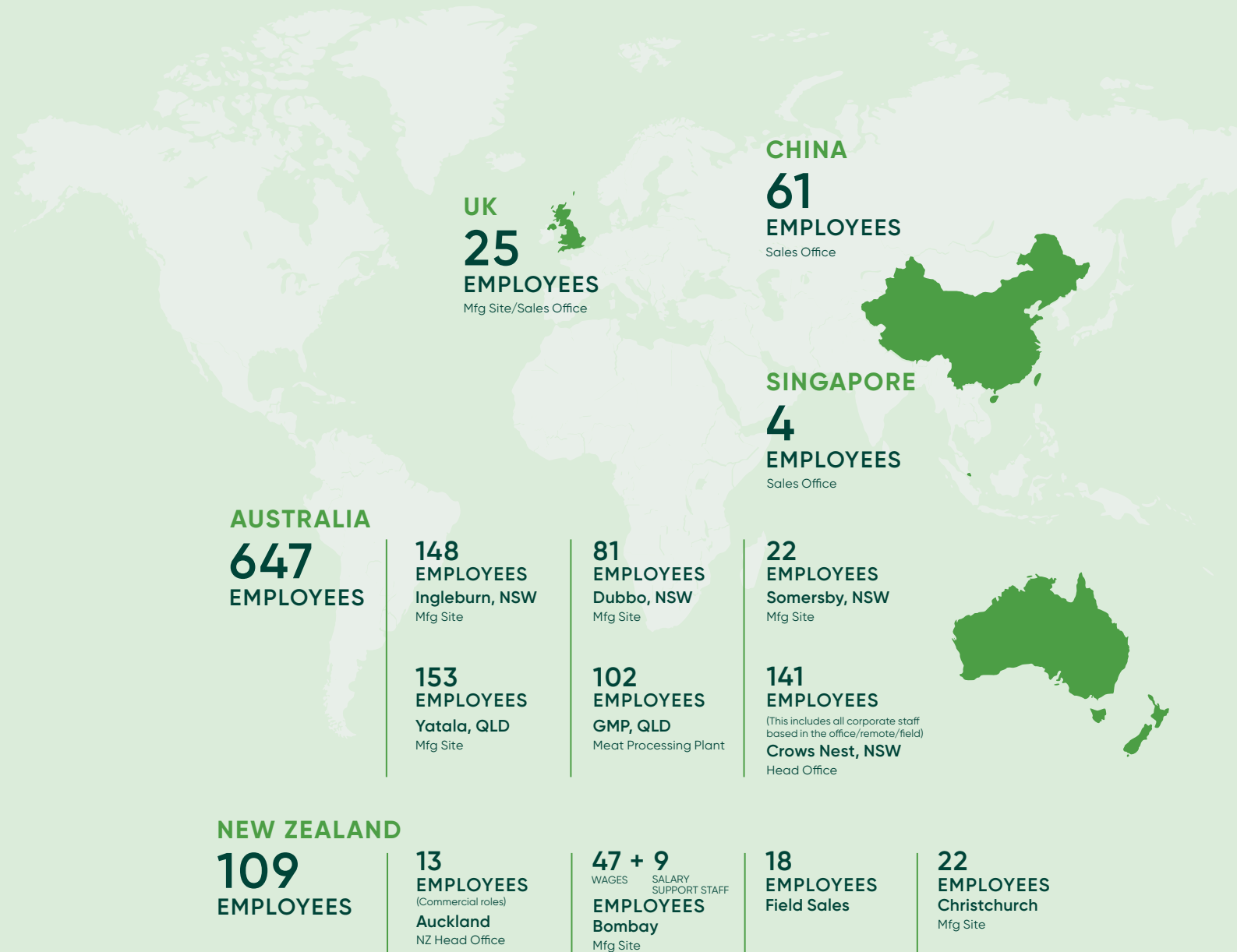
Real Pet Food Company (Shanghai) Co. Ltd

Benyfit Natural Pet Food Ltd (UK)

RPF Group Limited (UK)

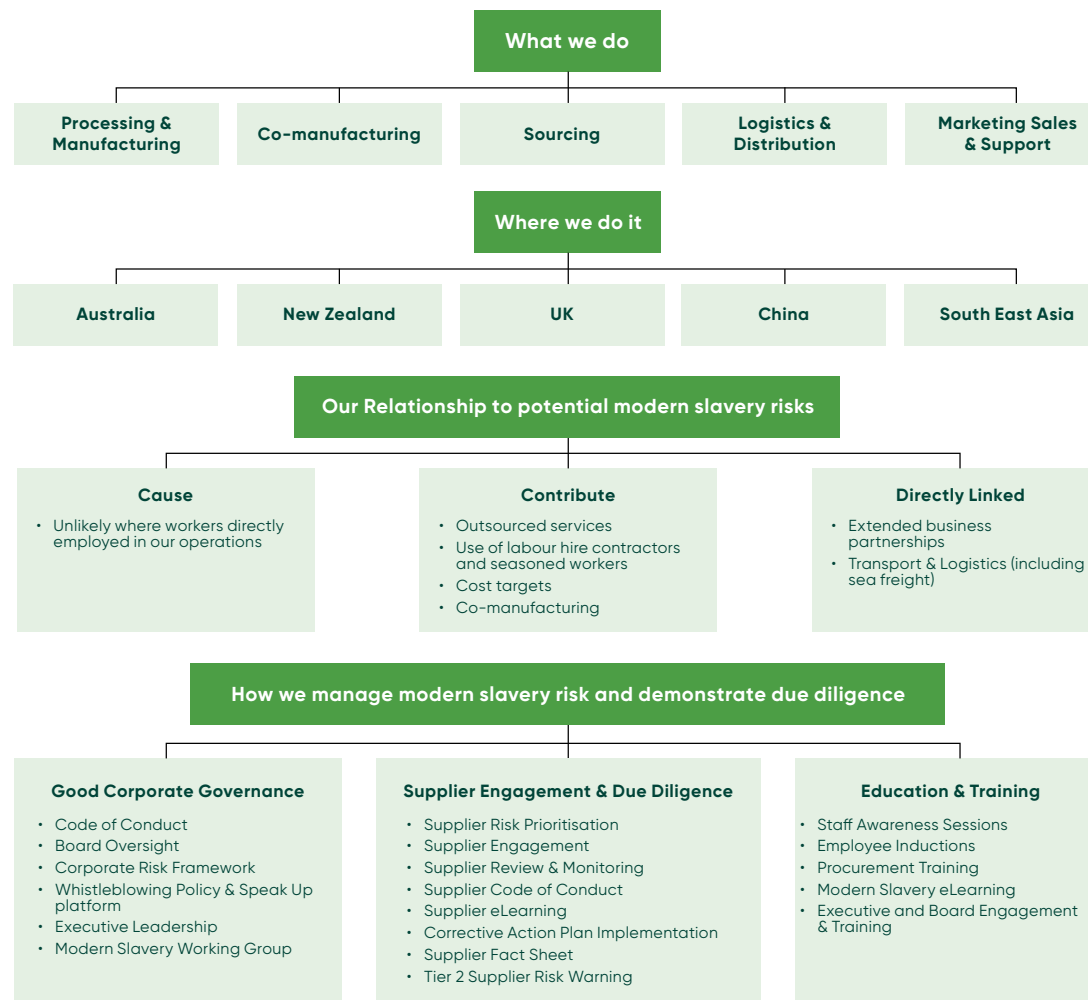
Our Structure

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



Our Operating

RPF's operations include owning and operating pet food manufacturing facilities, including managing, and overseeing the working conditions of our employees. We manufacture and distribute dry, wet, fresh, chilled and treat pet food for dogs and cats in Australia, China, NZ, UK, and Asia. Our operations also include the sale, marketing and distribution of our pet food and related products.



Our Supply Chains

In 2022 we worked to remove complexity from our supply chains and, where possible, worked 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 and reduce the potential for risks associated with Modern Slavery.

Given that we have not added any major suppliers to our preferred supplier list, there has been no significant change to the procurement risk profile between the 2021 and 2022 reporting years.

Over 80% 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 also remained unchanged and is as per below.

What we buy

GOODS



Meats, Poultry/
Seafood



Food
Additives



Agricultural
Products



Packaging



Finished
Goods



Office Furniture/
Fittings/Supplies



Oils
(Fish, Sunflower, Emu)

SERVICES



Cleaning
Services



Graphic Design/
Printing Services



Transportation
And Logistics



Machinery



PPE And
Clothing



Maintenance
Services



Labour Hire



Professional
Services

Operational Risks

While the risk of modern slavery conditions occurring within our own operations in Australia is relatively low (given our strict adherence to regulatory requirements, internal policies, and governance processes), we work in known high-risk industry sectors such as meatworks, agriculture and food processing. 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.

We also recognise 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, particularly from suppliers in countries identified as higher risk for modern slavery.

We have completed a comprehensive gap analysis to identify our governance maturity specific to modern slavery and intend to review this on a biennial basis with the next review due in 2023.

Supply Chain Risks

During 2022 we continued the implementation of our enhanced supplier due diligence program using our 2020 modern slavery risk prioritisation as a baseline (see summary below).

As was stated in previous sections, we consolidated our supply chains in 2022 to remove complexity. Removing complexity and reducing our number of suppliers has meant that there has been no significant change to the procurement risk profile between 2022 and the baseline. We plan to review this work in 2023.

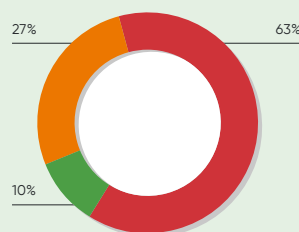
Summary Of Our 2020 Supplier Risk Profile

Risk by Spend

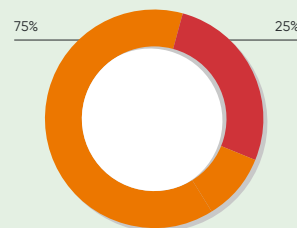
63%

of total spend is potentially high risk for modern slavery largely due to our spend on meat, poultry, seafood and agricultural products.

A further 27% of spend is categorised as medium risk for modern slavery and 10% as lower risk.



Risk by Suppliers



Just over 25% of suppliers have potential high exposure to modern slavery in their operations and supply chains.

Whilst some of our direct suppliers based in Australia may represent a lower risk, goods and services procured from many of our Australian suppliers are sourced from countries with a higher risk for modern slavery.

Risk by Category

Close to **TWO-THIRDS** of the direct and indirect materials and services we procure are potentially high risk for modern slavery.

85%

of our high risk spend is associated with five high risk categories :

- Meat/poultry/seafood
- Agricultural products
- Food additives
- Packaging materials
- Finished goods

Risk by Market

Highest risks are within the ANZ market due to our procurement of potentially high-risk goods and services from industry sectors and businesses demonstrating limited evidence of modern slavery risk management practices.

Most risks in other RPF markets can be attributed to the intercompany manufacturing arrangements and procurement of finished goods by external manufacturers.

We have several potentially high-risk direct suppliers in China and Thailand.

Supply Chain Risks

We continue to assess our modern slavery risk against four key risk indicators:



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.



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.



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.



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.

Tier 2 Supplier Risk

Risk by Category

Working with our Tier 1 (direct) suppliers, we identified significant potential modern slavery risk among our Tier 2 (indirect) suppliers. Thirty-one of the 55 suppliers who completed our supplier survey, provided the names of suppliers used to fulfil contractual obligations with RPF (i.e our Tier 2 suppliers). Unsurprisingly, in a specialised sector such as pet food manufacturing, eleven of the 74 Tier 2 suppliers named are also direct (Tier 1) suppliers to RPF.

A high-level risk assessment (based largely on industry sector and category of supply) was undertaken of the Tier 2 suppliers. Based on the goods and services provided, over 90% of Tier 2 suppliers are potentially high risk for modern slavery (Figure 1).

The five categories with the largest number of identified Tier 2 suppliers are:

- Meat/poultry and seafood
- Packaging – fibre
- Product materials, fittings and consumables (largely related to packaging materials)
- Agricultural products
- Packaging – films

This is outlined further in Figure 2 to the right.

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

Figure 1: Risk Assessment of Tier 2 Suppliers (% Total)

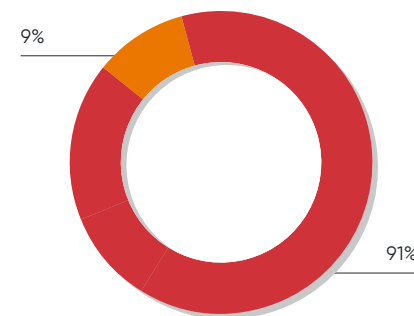
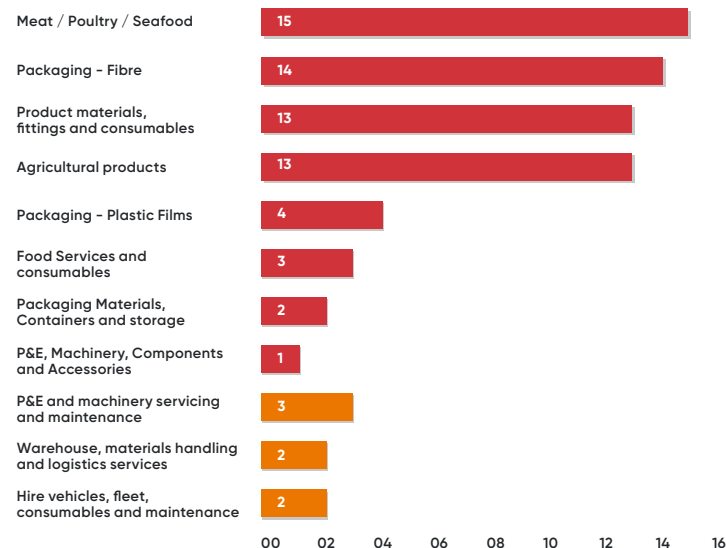
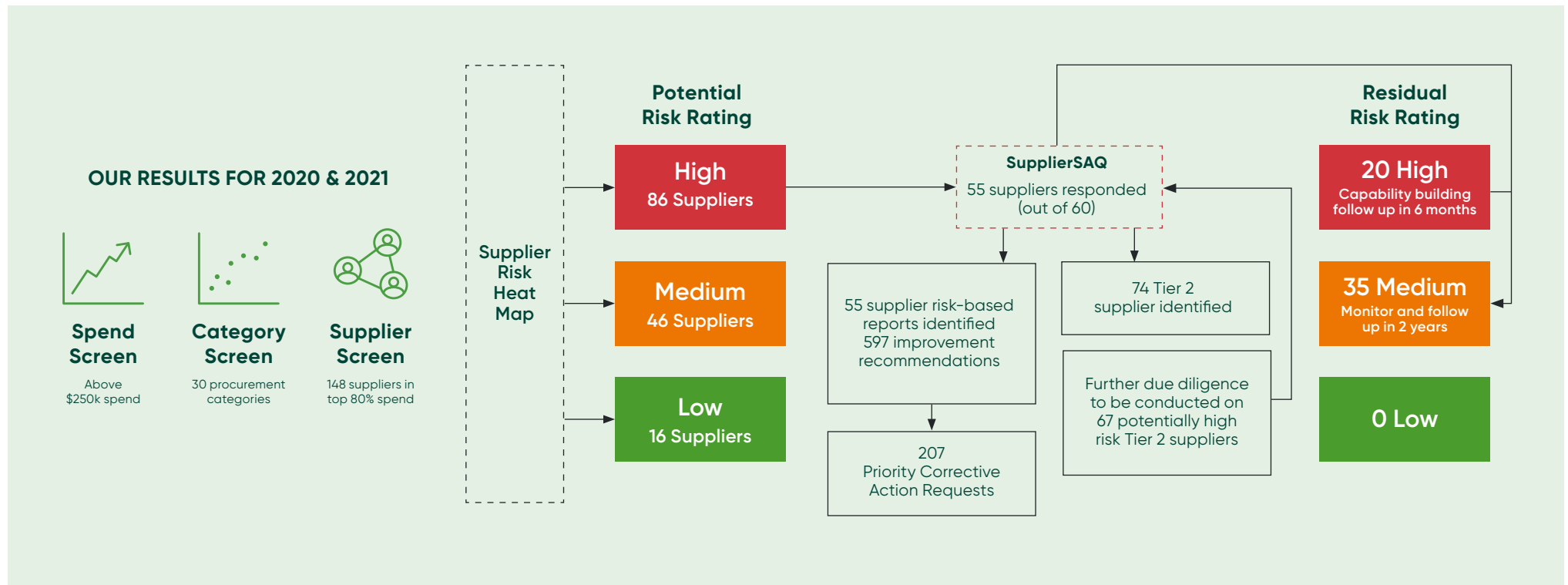


Figure 2: Goods and Services Provided by Tier 2 Suppliers and Category Risk



Tier 2 Supplier Risk

Our supplier due diligence and risk screening process and outcomes for the most recent assessments are illustrated in the infographic below.



Action Taken in 2022

In 2022 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:



Introduced a requirement to address Modern Slavery risks in Requests for Tender.



Engaged with suppliers on a deeper level regarding Modern Slavery issues.



Tracked progress on corrective actions plans with suppliers. This work was particularly focused in the Packaging category where a lot of our packaging is produced overseas in countries that are viewed as high risk for modern slavery.



Conducted due diligence on additional suppliers to capture 100% of high-risk ANZ spend and issued corrective action plans.



Prepared a modern slavery snapshot of our highest risk international co-manufacturing partner.

Our modern slavery risk management action plan and due diligence processes will be reviewed regularly as part of our corporate sustainability (ESG) 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 2022, 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"> Introduced a requirement to address 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 maturity 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 Conducted due diligence on additional suppliers to capture 100% of high-risk ANZ spend and issued corrective action plans 	<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 	<ul style="list-style-type: none"> Percentage suppliers engaged and trained Percentage supplier responses to shallow dive survey Percentage suppliers responding to deep 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 Group operate under a common and consistent 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 spoilt 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. In addition to the Community Grants Program that runs at each of our production sites, there are some causes that we support as an organisation that are close to our heart:

Aussie Helpers

As Australia experiences drought and other natural disasters in regional areas, our Aussie farmers need our ongoing support.

Since 2017 we've been proud supporters of Aussie Helpers, a not-for-profit organisation dedicated to helping Aussie farmers, farming families and farming communities survive through the tough times



Starlight Foundation

Starlight Foundation's mission is to complement traditional medical treatment by helping young people flourish, build resilience, and shape their individuality.

Over 10% of all wishes made through the Starlight Wishes Program are for a puppy or a kitten. As a Gold Partner with Starlight Foundation, we're incredibly proud to be the ones to help bring joy and love to kids and their families by helping grant all pet wishes made.



Greyhound as Pets (GAP)

We are passionate in our belief that every pet deserves a happy home. GAP NSW are a not-for-profit charity aimed at re-homing greyhounds, and to help our grey hound friends make an easier transition into their new homes.

We lend our support to this this fantastic cause by supplying IVORY COAT in all foster and adoption centres and providing educational materials around the importance of pet nutrition to new pet parents. In 2022 we provided 18 tonnes of Ivory Coat to feed grey hounds waiting to be adopted and gave out 2,200 adoption packs to pet parents who adopted grey hounds from GAP

