



*Here for your pet business*

## **Pedigree Wholesale Limited Modern Slavery Statement Financial Year Ending 31 December 2022**

### **Introduction**

This statement covers the activities of Pedigree Wholesale Limited.

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

### **Definitions**

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

### **Our Commitment**

Pedigree Wholesale Limited does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Europe, China, India, Japan, Vietnam, USA.

### **Our Structure**

Pedigree Wholesale Limited is a family-owned business formed 51 years ago in 1972. The business's head office is in Nottingham with four additional distribution centres that support national deliveries with 90% completed on our own fleet. Pedigree's core customers are the Independent Specialist Pet Retailer with access to a portfolio of over ten thousand products from over 220 suppliers.

Pedigree Wholesale employs 205 employees across all sites and our mission is to be The Pet Wholesale of choice.

## **Cost of living Crisis**

The current cost of living crisis has heightened our awareness of the importance of due diligence regarding Modern Slavery and the identification of vulnerable people because of this. We are mindful that the pressure caused by this crisis will increase pressure on retailers, customers, suppliers, and employees.

## **Within Pedigree Wholesale**

Pedigree Wholesale have several people policies and processes that demonstrate compliance with UK Employment Law including:

- Employee Code of Conduct
- Recruitment Policy
- Whistleblowing Policy
- Anti-Bribery Policy

All policies are within our new Pedigree Wholesale Intranet and are published to teams in various formats both online and in hard copy to ensure all employees receive and have ongoing access to these policies.

Our goal with regards to our people is to make Pedigree a great place to work for all our employees and in doing so create a safe environment.

In early 2022, we embarked on a renewed strategy to create a best-in-class workplace wellbeing culture at Pedigree Wholesale which started by surveying colleagues and then working hard to respond to their feedback. We created a dedicated Wellbeing Steering Committee who committed significant time in analysing approximately 12,000 data points and 287 verbatim comments. This data informed the creation of our wellbeing strategy and allowed us to prioritise and target our interventions on where it matters most.

One of the most significant interventions, as mentioned previously, was the creation of a new Employee Intranet, facilitating communication to break silos and connect colleagues across all teams, sites, and shifts. This further supports the reshaping of our business community as we enhance the reconnection of colleagues to the workplace, their roles, and their team, because of the macro externalities that have impacted our people over the last 3 years.

Acknowledging and protecting the psychological health and safety of our employees is seen as a critical component to creating an environment where our employees feel safe to challenge and raise their concerns so appropriate actions may be taken which is fundamental to supporting our commitment to Modern Slavery compliance.

## **Supply chains**

To fulfil its activities, the main supply chains of the organisation include those related to the supply of goods from various suppliers in both the United Kingdom and Internationally. We understand that the organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

### **Potential exposure**

The organisation considers its main exposure to the risk of slavery and human trafficking to exist in its Pet Foods & Accessories supply chains because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### **Organisational Activity**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its own brand suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has started to take the following steps to ensure that modern slavery is not taking place:

- adding training on Modern Slavery to our induction process for all staff in our Supply Chain and Buying team.
- review the training previously given to ensure knowledge is still up to date.
- Updating our Trading Agreement Checklist to include an action to confirm the suppliers compliance to Modern Slavery Act requirements.
- evaluating the modern slavery and human trafficking risks of each new supplier
- continuing to conduct supplier audits or assessments through the organisation's own staff/third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- beginning to take steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## **Policies**

The organisation has the following policies which further define its stance on modern slavery:

- *Whistleblowing policy.* The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact our HR Department in complete confidence.
- *Employee Code of Conduct.* The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- *Supplier Code of Conduct.* The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- *Recruitment Policy.* The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

The organisation's modern slavery training:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.

- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **Performance indicators**

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- continuing with the development of a system for supply chain verification with progress to be shown by 31 December 2022, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- progressing with the review of its existing supply chains with progress to be seen by 31 December 2022 whereby the organisation evaluates all existing suppliers.
- Review and distribution of a new Supplier Handbook to set out clearly the organisation's expectation on compliance with Modern Slavery legislation.

### **Slavery Compliance Officer**

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action regarding the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

### **Approval for this statement**

This statement has been approved by the organisation's Board of directors, who will review and update it annually.

### **Director's signature:**



**Director's name:** Gerard O'Mahony, Managing Director

**Date:** 31 March 2023