

Pedigree Wholesale Limited Modern Slavery Statement Financial Year Ending 31 December 2023

Introduction

This statement covers the activities of Pedigree Wholesale Limited.

The Organisation acknowledges its responsibilities regarding modern slavery and commits to complying with the provisions of the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of its internal practices regarding 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 having restrictions 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 52 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 Retailers with access to a portfolio of over ten thousand products from over 220 suppliers.

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

Cost of living Crisis

The ongoing 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 has 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 Pedigree Wholesale Intranet and published to teams in various formats online and in hard copy to ensure all employees receive and have ongoing access to them. These are also incorporated into all new starter packs.

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

Actions Achieved

Since the publication of the Modern Slavery Statement for the financial year ending 31 December 2022, Pedigree Wholesale Limited has undertaken the following:

- Pedigree Wholesale has continued to support the work of its Wellbeing Committee, which is focused on supporting and achieving our strategic goal of making Pedigree Wholesale a great place to work. Setting up interventions that support our commitment to Modern slavery compliance.
- The business has also expanded the number of Mental Health First Aiders to increase access to support for employees who may need additional support.
- Investing in a new Learning Management System to give access to a wider variety of awareness training.

Acknowledging and protecting our employees' psychological health and safety 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.

Reporting

Pedigree Wholesale Limited positively encourages employees to report any unlawful activity and/or any activity that may be in breach of policies and procedures through the Whistleblowing Policy. This includes any circumstances which may give rise to an enhanced risk of slavery or human trafficking.

Supply chains

To fulfil its activities, the organisation's main supply chains include those related to the supply of goods from various suppliers in 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 occur in its business or any organisation that supplies its goods and/or services.

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 that 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 Supply Chain and Buying team staff.
- After reviewing the training previously given, we have implemented iHASCO training for all relevant employees.
- working towards reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Conduct supplier audits or assessments through the organisation's own staff/third-party auditor, which has 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 and requiring them to implement action plans.
- invoking sanctions against suppliers who fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including terminating the business relationship.

Training Content

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:

- The iHASCO Modern Slavery training is made up of three sections:
 1. Modern Slavery Spectrum
 2. You and your organisation
 3. Test (with the expectation of scoring 85%)
- within this training, the teams learn about these four broad sections:
 1. Sexual exploitation
 2. Labour ePexploitation
 3. Domestic servitude, and
 4. Criminal exploitation.

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 its direct activities or supply chains. 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 disclose without fear of retaliation. Employees, customers, or others who have concerns can confidently contact our HR Department.
- *Employee Code of Conduct.* The organisation's code clearly outlines the actions and behaviour expected of employees 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 must 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 code's standards and improve their workers' 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.

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 2024, 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 2024. During this period, the organisation will evaluate all existing suppliers.
- Review and distribute a new Supplier Handbook that clearly states the organisation's expectations regarding 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. The officer 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.

CEO's signature:



CEO's name: Steve Brown – Chief Executive Office

Date: 31 March 2024