

Pedigree Wholesale Limited Modern Slavery Statement Financial Year Ending 31 December 2025

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 is committed to acting ethically, with integrity and transparency in all business dealings and to implementing effective systems and controls to safeguard against modern slavery and human trafficking taking place within the business or our supply chains.

The Organisation does not knowingly enter into business with any organisation, in the United Kingdom or abroad, that supports, engages in, or is found to involve itself in slavery, servitude, forced or compulsory labour, or human trafficking.

No labour provided to the Organisation in the pursuance of its services is knowingly obtained through slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in all countries in which it operates or sources products, including Europe, China, India, Japan, Vietnam and the USA.

In line with updated UK Government guidance issued in 2025 under Section 54 of the Modern Slavery Act 2015, Pedigree Wholesale Limited continues to strengthen its risk-based approach to identifying, preventing, mitigating and responding to modern slavery risks.

Our Structure

Pedigree Wholesale Limited is a family-owned business formed 53 years ago in 1972. The business's head office is in Nottingham, with three 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 eight thousand products from over 220 suppliers.

Pedigree Wholesale employs approximately 176 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
Sexual Harassment 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 2024, Pedigree Wholesale Limited has undertaken the following:

- Pedigree Wholesale has continued to support the work towards Wellbeing, 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 continued to promote and support our Mental Health First Aiders, supporting them with their re-qualifications to support employees who may need additional support.

- Our investment in the Learning Management System has provided access to a wider variety of awareness training across all sites and colleagues. This is continuing to increase engagement, awareness and understanding across our workforce.

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 within its organisation or supply chains. This includes reviewing the controls, ethical standards and compliance measures of suppliers, particularly within our own-brand supply chain.

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

In accordance with Section 54(4) of the Modern Slavery Act 2015, the Organisation continues to strengthen its approach through the following actions:

- Providing mandatory Modern Slavery awareness training to all employees through the Kallidus Learning Management System;

- The Organisation has purchased 10 specialist Modern Slavery training licences through VinciWorks for employees within the Buying and Supply Chain teams. This targeted training is designed to strengthen awareness of modern slavery risks, improve understanding of supply chain due diligence responsibilities, and support the identification and escalation of potential concerns within higher-risk areas of the supply chain;
- Continuing to review and map supply chains to identify and assess higher-risk areas;
- Conducting supplier audits and assessments, either directly or through third-party auditors, where elevated risks are identified;
- Working collaboratively with suppliers to improve standards where concerns are identified, including the implementation of corrective action plans where appropriate;
- Taking appropriate action where suppliers fail to meet required standards, including escalation procedures and termination of business relationships where serious breaches occur;
- Promoting awareness and encouraging employees to report concerns through confidential whistleblowing mechanisms;
- Reviewing policies, procedures and controls regularly to support continuous improvement and compliance with evolving legislation and guidance.

The Organisation recognises that effective modern slavery prevention requires ongoing vigilance, collaboration and continuous improvement across all areas of the business and supply chain.

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 Kallidus 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 exploitation
 3. Domestic servitude, and
 4. Criminal exploitation.

Buying and Supply Chain's modern slavery training:

- The VinciWorks Modern Slavery training:
 1. Identifying Modern Slavery in the Supply Chain
 2. Modern Slavery: Adaptive
 3. Modern Slavery Knowledge Check
 4. Modern Slavery: Practical Overview
 5. Modern Slavery: Practical Steps for Procurement
 6. Modern Slavery: Preventing Exploitation (UK)
 7. Modern Slavery Transparency Statement
 8. What is Modern Slavery
 9. Working with the Modern Slavery Act
 10. The Modern Slavery Act (short Video)
- Through this training, employees develop an understanding of:
 1. what modern slavery is and the various forms it can take;
 2. recognising indicators and warning signs of exploitation within businesses and supply chains;
 3. the legal and ethical responsibilities under the Modern Slavery Act 2015;
 4. practical steps for identifying, preventing and reporting concerns;
 5. the importance of supply chain due diligence and ethical procurement practices; and
 6. how to escalate concerns appropriately through internal reporting procedures.

Policies

The Organisation maintains a range of policies and procedures that support our commitment to preventing modern slavery and promoting ethical business practices. These policies are reviewed regularly to ensure ongoing compliance with legal requirements, updated guidance and best practice expectations.

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.

Governance and Accountability

Responsibility for the Organisation's anti-slavery initiatives is overseen by senior leadership and supported by the Slavery Compliance Officer.

The Organisation is committed to embedding responsible business practices throughout its operations and supply chains through:

- regular policy reviews;
- employee awareness and training;
- supplier engagement and monitoring;
- risk-based due diligence processes; and
- clear reporting and escalation procedures.

Modern slavery risks and compliance measures are reviewed periodically to assess effectiveness and identify opportunities for improvement.

Assessment of actions

During 2025, the organisation completed one audit on a Supplier based in the Far East. Following that audit, there were no actions to follow up on.

There have not been any new suppliers onboarded in 2025.

The organisation received 0 whistleblowing cases linked to modern slavery.

Performance indicators

The Organisation continues to review and strengthen its key performance indicators (KPIs) relating to modern slavery compliance and supply chain due diligence.

By 31 December 2025, the Organisation aims to:

- Continue developing and implementing a formal supply chain verification process for evaluating potential suppliers before onboarding;
- Progress the review and risk assessment of existing suppliers across the supply chain;
- Continue embedding Modern Slavery awareness training across the business and monitor completion rates;

- Review and distribute an updated Supplier Handbook clearly outlining the Organisation's expectations regarding ethical trading and Modern Slavery compliance;
- Strengthen supplier engagement and monitoring processes in higher-risk areas of the supply chain; and
- Continue reviewing internal reporting mechanisms to ensure employees can confidently raise concerns.

The Organisation will continue to assess the effectiveness of its actions and identify opportunities for continuous improvement.

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 2015 and will be reviewed for each financial year.

This statement is published on our company website:- [Modern Slavery Statement | Pedigree Wholesale Ltd](#)

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
Role: Chief Executive Officer
Date: 20 May 2025

MD's signature



MD's name: Paul Lewis
Role: Managing Director
Date: 20 May 2025