

Supplier Code of Conduct

Pets at Home is the UK's leading pet care business, providing pet owners with everything they need to look after their pet – from food, toys and bedding, and grooming services, right the way through to first opinion veterinary care. Our vision is to become the most responsible pet care business in the world.

OUR APPROACH

This Supplier Code of Conduct sets out our expectations of suppliers on labour practices, animal welfare, environmental stewardship, and the sustainable sourcing of raw materials. It should be read and observed in conjunction with our [Code of Ethics and Business Conduct](#), [Anti-Bribery Policy](#), [Whistleblowing Policy](#), [Human Rights Policy](#), [Environmental Policy](#), [Raw Materials Sourcing Policy](#) and [Packaging Policy](#).

Our provisions on labour issues – such as pay, working hours, child labour, worker rights, and representation – align with the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is a private code agreed amongst business, NGO, and Trade Union members of the ETI. It draws on the Universal Declaration on Human Rights and the conventions of the International Labour Organization.

We recognise that our suppliers may need support to meet this Code of Conduct, and we have therefore provided detailed guidance within our [Responsible Sourcing Handbook](#) and we commit to working collaboratively with our suppliers to support its implementation. However, where standards are persistently not met or we encounter a zero-tolerance issue without timely resolution, we will end our business relationship. Zero-tolerance issues are explained in the relevant sections of the Responsible Sourcing Handbook.

The provisions of this Code of Conduct constitute minimum and not maximum standards and should not be used to prevent companies from exceeding these standards. Companies applying this Code of Conduct are expected to comply with national and other applicable law and, where the provisions of law and this Code of Conduct address the same subject, to apply that provision which affords the greater protection.

THE SCOPE OF THIS POLICY

This Code of Conduct applies to all our suppliers of goods (both for resale and for use in our business) and services, contractors and business partners. This Code is authorised by our ESG Committee which receives regular updates about our suppliers' social and environmental performance and ensures that suitable support is available for its implementation. This Code is regularly reviewed to ensure it remains fit for purpose and continues to promote our ambition to become the most responsible pet care business in the world.

We expect our suppliers to communicate the provisions of this Code of Conduct to their suppliers and business partners and take appropriate steps to ensure it is effectively implemented within their supply chain.

REPORTING CONCERNS

If you wish to report any concerns or non-compliance in relation to this Code of Conduct or any other Pets at Home policy, please call our Whistleblowing Helpline at +44 (0) 808 168 3620 or email supplychainwhistleblowing@petsathome.co.uk. For more details, refer to our [Whistleblowing Policy](#).

TRANSPARENCY REQUIREMENTS

The following transparency requirements do not currently extend to retail or procurement supplier brands unless products are exclusively supplied to Pets at Home in the UK, or we consider it to be a tertiary brand (See definitions).

A. Supply chain transparency

To ensure that human rights are safeguarded, and the environment is protected, we must know where our products are made.

No production should commence until suppliers have received notification that the final manufacturing site and any packing site is approved by the Pets at Home Technical and Responsible Sourcing Teams. This approval is granted for a particular manufacturer, at a particular address. Production should never be subcontracted, outsourced or relocated to a new production site without prior approval from Pets at Home.

Please contact us if you are experiencing any difficulties and need to make contingency arrangements. Otherwise, unauthorised subcontracting represents a critical breach of our supplier terms and conditions.

B. Public disclosure of our supply chain information

Increased transparency of supply chain information not only demonstrates our joint commitment to responsible sourcing but also helps us better track and manage social, environmental and governance risks.

It is a requirement of this Supplier Code of Conduct that we can publish details of the factories used by our suppliers.

C. Supply chain mapping

We want to support our suppliers in building strong responsible sourcing programmes, so it is important that we also understand where components and ingredients which make up our products are sourced from. We require full disclosure of these sources and request our suppliers also have supplier agreements in place which ensures shared visibility back to raw material sources.

We require our suppliers to map their supply chain back to at least tier 2 (primary processors) and where possible, for high-risk commodities, back to tier 3 (raw materials source).

We also require visibility of all outsourced packing sites, subcontractors and offsite warehousing used to supply Pets at Home.

D. Right to audit

We reserve the right to conduct surveillance audits to ensure compliance to this Supplier Code of Conduct. These audits may be announced, semi-announced or completely unannounced and will be undertaken by either a Pets at Home colleague or a designated and authorised 3rd party.

RESPONSIBLE SOURCING

1. Business is conducted lawfully and ethically

Suppliers must conduct business ethically without bribery, corruption or any fraudulent, unethical or illegal business practices and ensure compliance to all relevant local and national laws.

See our full [Anti-Bribery Policy](#) and [Code of Ethics and Business Conduct](#)

2. Trade restrictions and sanctions are complied with

Pets at Home complies with all trade restrictions and sanctions applicable to our business activities. We require all suppliers to implement adequate controls and processes including screening and due diligence to ensure they do not engage with embargoed territories or sanctions targets.

See current UK sanctions list - <https://www.gov.uk/government/publications/the-uk-sanctions-list>

3. Privacy is protected

Suppliers must have adequate systems in place to protect confidential information and to comply with all relevant laws relating to data protection and privacy protection.

4. No forced labour

Suppliers must under no circumstances use or benefit from any form of involuntary labour including forced, trafficked, bonded, indentured or prison labour. Workers freedom of movement shall not be restricted in either the workplace or their accommodation and workers personal documents must not be retained. Workers must not be charged any recruitment or employment fees.

5. The right to freedom of association and collective bargaining are respected

Suppliers must respect the rights of workers to freedom of association and collective bargaining. This includes the right to form or join unions or associations of their choice. Where this right is restricted under local law, parallel means for independent and free association and collective bargaining must be permitted. No workers should be discriminated against or unfairly treated based on their membership of a union or association, or for choosing to refrain from such membership. In the absence of an established or legally mandated trade union agreement, the supplier shall have alternative systems in place for effective consultation with workers and workers representatives.

6. Health, safety and wellbeing at work is protected

Suppliers must provide and maintain a safe and hygienic workplace to protect their workforce from harm arising from accidents, injuries and occupational diseases.

7. Children are protected

Suppliers must only employ individuals who have reached the legal minimum age for employment or the age of completion of mandatory education. Even where local law allows for lower limits, this shall never be less than 15 years of age. Where young workers under the age of 18 years are employed, work must not interfere with their education, nor cause any mental, physical, social or moral harm. Suppliers must take appropriate steps to identify and reduce child labour risks within their supply chain.

8. Fair wages and benefits

All workers must be paid wages, overtime pay, benefits and paid leave which meets at least the legal minimum, any negotiated terms or appropriate prevailing industry standards, whichever is higher. Wages and benefits should always be enough to meet basic needs and provide some discretionary income. Deductions from wages must not be used as a disciplinary practice. Workers must be provided with clear and understandable pay information each time they are paid.

9. Working hours are reasonable

The regular working week, excluding overtime, must not exceed 48 hours. Daily working hours should not exceed 13 hours. Workers shall be provided with at least one day off in every 7-day period or, where allowed by local law, two days off in every 14-day period. All overtime shall be voluntary. The total hours worked in any 7 day period shall not exceed 60 hours, except in exceptional circumstances where the following is met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

10. Equal opportunities are provided

Suppliers must commit to equal opportunities and not engage in or support any discrimination in employment, remuneration, access to training, promotion, disciplinary actions, termination or retirement on the basis of race, caste, national origin, migrant status, religion, age, disability, gender, marital status, pregnancy, parental status, sexual orientation, union membership or political affiliation.

11. Good work opportunities are provided

Suppliers must provide all workers, whether permanent, temporary or casual, with a written employment contract. Temporary labour contracts and labour-only contracting must only be used for short-term labour demands and not used to avoid meeting labour and social security obligations afforded to permanent employees or leave workers in an insecure employment relationship. Contracted working hours should reflect established working patterns and zero-hour contracts avoided unless they offer genuine flexibility for workers.

12. Workers are treated with respect and dignity

Suppliers must treat all workers with respect and dignity and commit to a workplace free of harassment and violence by prohibiting all forms of physical, sexual, psychological and verbal abuse, coercion, harassment or other forms of intimidation.

13. Effective grievance mechanisms are in place

Suppliers must provide an effective and transparent grievance mechanism for workers and communities to raise concerns. Processes shall be in place to ensure that there is no retaliation or unfair treatment of reporters who speak up in good faith. Mechanisms must be in place to allow for anonymous reports to be raised.

Manufacturers of Pets at Home own label products must display a copy of our Whistleblower Poster so this is accessible to their workforce.

14. Responsible recruitment practices are followed

Where agencies are used for recruitment or the supply of temporary labour, suppliers must ensure that they fully understand the entire recruitment process including the use of labour recruiters and intermediaries. Workers must not be charged any recruitment or employment fees at any stage of the recruitment process. Migrant workers hired from another region or country must receive their employment contract prior to departing their home region or home country of origin. Their contract must not be changed in any form on arrival to their destination of employment, unless these changes are made to meet local law and provide equal or better terms. Suppliers must regularly audit employment agencies from whom they obtain workers to ensure full compliance to legal and ethical standards.

15. Entitlement to work is verified

Suppliers must only employ workers with a legal entitlement to work. All workers, including temporary and employment agency workers, must have their legal right to work validated by reviewing original documentation before they are allowed to commence work. Original documents must be returned to workers.

16. Business provided accommodation is safe and meets acceptable standards

Where provided, supplier accommodation must be maintained in a safe and hygienic condition, meeting acceptable housing standards. Accommodation should be kept secure for safety and wellbeing but not unduly restrict workers' freedom of movement. When a worker's contract is terminated, the worker must be entitled to a reasonable period of time to vacate the premises, in accordance with national law and custom. Where migrant workers relocate for work and no supplier provided accommodation is available, the supplier must provide guidance and ongoing support to ensure workers find and remain in suitable and safe housing.

17. Subcontracting and homeworking is controlled

There must be no homeworking, subcontracting or external processing of Pets at Home own label production or part of production unless previously agreed in advance by Pets at Home Technical and Responsible Sourcing Teams. Systems shall be in place to ensure that any subcontractors and homeworker intermediaries fully comply with legal and ethical standards.

18. The environment is protected.

Suppliers must meet all local and national environmental legislation including holding all relevant permits for the facility, use of resources, disposal of waste and release of emissions. Effective management systems shall be in place to identify and control the environmental impacts of business activities, products and services whilst continually improving environmental performance. Energy and water should be used efficiently and responsibility (utilising low carbon and/or renewable energy sources where possible). Waste should be minimised and recycled where possible. Chemical use should be carefully controlled, and substances handled, stored and disposed of safely. Suppliers shall develop or participate in programmes which support the reduction of greenhouse gas emissions as close to zero as possible. Suppliers are strongly encouraged to support initiatives which seek to protect biodiversity.

See our full [Environmental Policy](#)

19. Raw material are responsibly sourced

We encourage our suppliers to create better, more sustainable products using raw materials from sustainable sources. Please refer to our [Raw Materials Sourcing Policy](#) and our [Packaging Policy](#) for specific requirements on key raw materials.

20. Animal Welfare is assured

Suppliers must ensure that products derived from animals are responsibly sourced to ensure the highest standards of animal welfare. Animal testing of household and hygiene products or their ingredients is prohibited.

See our full [Supply Chain Animal Welfare Policy](#).

DEFINITIONS

OWN LABEL – Product or packaging bearing a Pets at Home Group brand logo or name.

EXCLUSIVE BRAND – A supplier brand only retailed in the UK by Pets at Home.

TERTIARY BRAND – Unbranded product or brand with no established brand recognition.

CHILD - Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age will apply. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

YOUNG PERSON - Any worker over the age of a child as defined above and under the age of 18.

CHILD LABOUR - Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child’s or young person’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral, or social development.

HAZARDOUS WORK - Any task where there is a significant risk of negative impacts on the health, safety and/or moral integrity of a young person or that will harm their physical, mental, social and/or moral development.

MIGRANT WORKER - Any person who migrates from one country or region to another (or who has migrated from one country or region to another) with a view to being employed other than on his own account.

EMPLOYMENT AGENCY WORKER - Any worker contracted by an agency and temporarily supplied to an employer by the agency. This does not include self-employed workers.

HOMEWORKER – A person who carries out work within their home (or other location of their choice, other than their employers’ premises) and produces a product or service under the direction of their employer for remuneration.

RECRUITMENT FEES - Any fees or related costs charged to workers for their recruitment, directly or indirectly, in whole or in part. Recruitment fees include:

- Payments for recruitment services offered by labour recruiters;
- Payments made in the case of recruitment of workers for third parties;
- Payments made in case of direct recruitment by the employer;
- Related costs of recruitment, referral and placement within or across national borders, such as but not limited to: medical costs, insurance costs, costs for skills and qualification tests, costs for training and orientation, equipment costs, travel and lodging costs, administrative costs and visa applications.

SUBCONTRACT – To employ a 3rd party business or individual to manufacture a Pets at Home product or carry out a complete service for Pets at Home on your behalf. This includes the outsourcing of a key production process which is integral to a products construction. If production or part of production is moved to an undisclosed manufacturing site within the same company ownership, this will also be classified as subcontracting.

This policy is owned by our Product and Supply Chain Committee which meets at least quarterly to review our responsible sourcing performance and ensure suitable support is available for its implementation. The policy is approved by our ESG Committee, which operates with delegated authority of our Board, and receives regular updates on performance against our targets. This policy is regularly reviewed to ensure it remains fit for purpose and continues to promote our ambition to become the most responsible pet care business in the world.

Document Title:	Pets at Home Supplier Code of Conduct
Prepared by:	Group Head of Social Value
Authorised by:	ESG Committee
Published location:	Pets at Home Investor Website
Other documents referenced:	Code of Ethics and Business Conduct Anti-Bribery Policy Whistleblowing Policy Human Rights Policy Environmental Policy Raw Materials Sourcing Policy Supply Chain Animal Welfare Policy Responsible Sourcing Handbook Packaging Policy
Review date:	September 2023