



# Human Rights and Modern Slavery Statement 2025



**This is the Pets at Home Group's ninth statement made under section 54 of the Modern Slavery Act 2015 ('Act') and constitutes our Group Modern Slavery Act Statement for the financial year 2024/25. It outlines the key activities we have undertaken during the year and aims to provide information to demonstrate our commitment as a responsible business to reduce the risks of modern slavery. We take seriously any allegation of human rights abuse in all its forms in any part of our organisation or our supply chain.**

We recognise our responsibility to face into this global problem that tragically affects millions of people. We acknowledge that it is a complex issue and we have risks across our business and supply chains which we are working to mitigate. Ensuring that all people in our business and supply chains are treated with dignity and respect is one way that we can deliver our purpose of 'creating a better world for pets and the people who love them'. We have made progress during the year, particularly through conducting more in house audits of existing and prospective factories following the investment in additional resource in 2024. During May to July 2025, we have had significant findings in relation to one supplier operating from a number of factory sites in China. Although this falls after the reporting period of this statement, in the interests of transparency we have included the details of this on pages 6 and 7 of this document.

We assess ourselves against the latest guidance including 'Transparency in supply chains', recently published by the Home Office, and the IASC Modern Slavery Maturity Framework'.

## About Us

# Pets at Home Group PLC is the UK's leading pet care business.

Our pet care centres, grooming salons, small animal veterinary practices and online platform provide the best products and services to guide owners through their pet care journey.

Pet food and pet accessory products are available online or from our 459 pet care centres, 343 of which includes a grooming salon. Pets at Home operates the largest branded network of veterinary practices in the UK, with a total of 448 practices made up of Joint Venture and company managed practices. We also offer round-the-clock veterinary telehealth advice and triage so clients can access all their pet healthcare needs whenever they need to. More than 16,000 colleagues are employed either directly or indirectly (via Joint Venture Companies). We operate one national distribution centre in house and operate a fleet of leased HGVs and vans. Our growing home delivery network is supported by carefully selected carrier partners.

**459** **Pets at Home**  
pet care centres

**343** **Pets Grooming**  
grooming salons

**448** **Vets for Pets**  
small animal  
veterinary practices

**>16,000**  
products in our extended  
online range

## Our consumer focused business model and strategy.

### Our Vision

To build the world's best pet care platform

#### Integrated

A unified blend of products, services and advice

- Nutrition
- Accessories
- Preventative Care
- Curative Healthcare
- Grooming & Wellbeing
- Adjacencies

#### Omnichannel

Seamlessly connected

- Physical Pet Care centres and practices
- Virtual consultations
- Digital advice and support
- E-commerce, click & collect
- E-pharmacy and telemedicine

#### Consumer-centric

An unrivalled experience

- Seamless and frictionless
- Easy and enjoyable
- Targeted and personalised
- Simple, unified experience across app, online, physical and virtual

Examples of some of our own label brands

**Pets at Home**



**16,000+**  
colleagues across our group

**1**

UK Support Office  
in Handforth

**1**

Regional Sourcing Office in Hong Kong

**1**

Own Operations Distribution Centre  
located in Stafford

One located in Northampton was  
exited by May 2025

## Our Supply Chain

**We have a clear supplier strategy which supports our commitment to responsible sourcing:**

1. We carefully select business partners who share our values and commitment to uphold and continuously improve labour and environmental standards.
2. We seek to build long term stable supplier relationships and use our buying power to influence improvements in workplace and supply chain standards.
3. We set clear expectations for supplier standards and provide guidance and support to help our supplier partners to achieve these standards.

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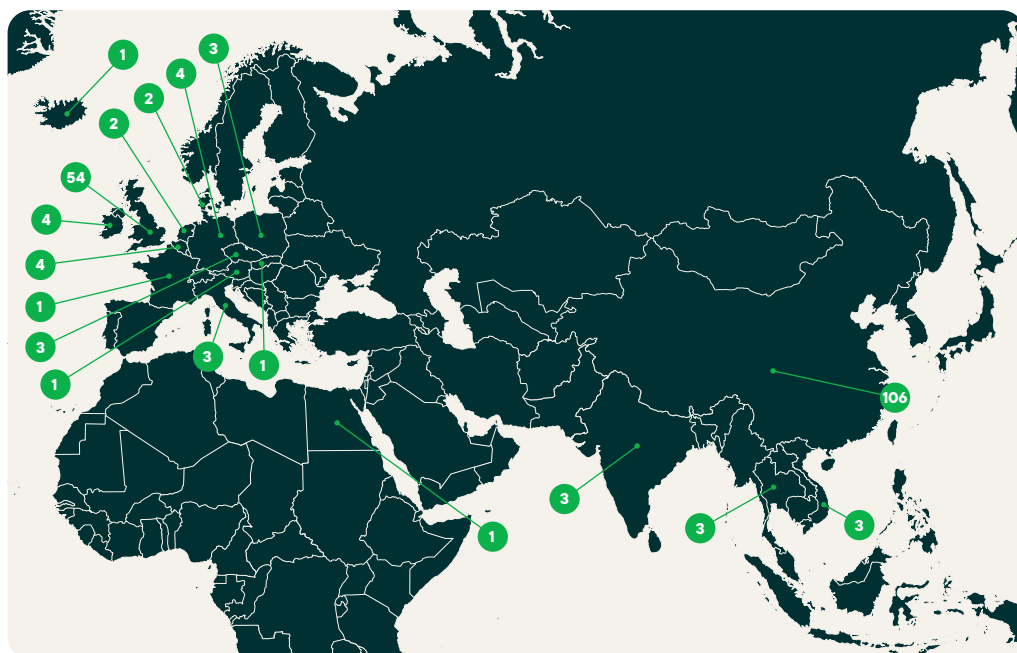
**suppliers of  
Pets at Home  
own label products  
supplying from**

199

**manufacturing  
sites located in**

18

**countries**



**32,000\*\***

**Over 32,000 workers in the first tier  
of our own label supply chain.**

**49%\*\***

**Over 49% of workers in the first tier of our own label supply chain are female.**

**30%\*\***

**Over 30% of workers in the first tier of our own label supply chain are migrant workers\*. In addition approximately 4.8% are temporary, agency or seasonal.**

260+

**In addition to our 85 own label suppliers there are over 350 suppliers of supplier label products into our retail operations.**

# 50+

**Key suppliers of products and services for our small animal veterinary practices sourced by our Vet Group.**

800+

**Suppliers of products and services not for resale used across our retail, distribution and support office operations.**

**We recognise the importance of transparency in demonstrating our accountability for standards in our supply chain and helping us to identify and remediate human rights violations. We continue to publish a list of our first tier (final production) own label product manufacturing sites.**

## What's next?

For high risk areas, we are continuing to work with our suppliers to map and gain better visibility of our upstream supply chain for components, primary processors and raw materials sources.

\* Defined as having moved either domestically or across country for this particular role.

\*\* Worker number breakdown data is sourced from information held on the SEDEX platform.

## Policies

### Policies

We have group policies which outline our commitment to upholding human rights and preventing modern slavery. We keep all policies under regular review to ensure that we are recognising best practice and driving continuous improvement in our operations and in our value chain.

### Human Rights Policy

Our [Human Rights Policy](#) confirms our commitment to respect internationally recognised human rights in line with the International Bill of Human Rights, the International Labour Organisation Conventions, the UN Guiding Principles on Business and Human Rights and the Children's Rights and Business Principles.

### Supplier Code of Conduct

Our [Supplier Code of Conduct](#) outlines our expectations of suppliers in relation to human rights, environmental, ethical and legal standards. Additional elements include supply chain transparency, business ethics, trade sanctions and animal welfare.

### Responsible Sourcing Handbook

Our [Responsible Sourcing Handbook](#) brings our Supplier Code of Conduct to life with detailed implementation requirements, guidance and signposting to additional resources. We provide insight into how we embed these principles into our own operations and make commitments to our suppliers on how we conduct business; inviting them to tell us (confidentially if preferred) if we ever fail to uphold these commitments.

### Supplier Terms and Conditions

Our responsible sourcing requirements form a key part of our contractual agreements with suppliers.

### Child Protection Procedure

Our [Child Protection Procedure](#) sets our commitment to a child-centred response to child labour. It provides clear guidance on how to investigate concerns, escalate for support, immediate steps for safeguarding and principles for successful remediation.

### Supplier Exit Guidance

We have 'Responsible Supplier Exit guidance' which outlines our approach to exit suppliers in a responsible way that seeks to mitigate the risks to suppliers and ultimately to vulnerable workers.

## Whistleblowing mechanism

We want our suppliers to promote positive and open dialogue with their workforce but if things do go wrong, to also have mechanisms in place which allow for whistleblowing disclosures and worker grievances to be reported in confidence. We require our suppliers to have internal procedures in place to investigate colleague (and wider stakeholder) concerns and resolve any issues in conjunction with worker representatives, whenever possible. However, where issues have not been resolved or individuals feel unable to report concerns within their organisation, it is important that the people in our supply chain have a mechanism to reach out to us. We therefore require all our own label manufacturing sites to display a colour copy of our whistleblowing poster in a prominent location onsite so that it is accessible to their workforce. A documented whistleblowing procedure detailing how we will respond (including specific actions for safeguarding vulnerable persons) is in place to support the investigation of any reports. During the year we received two genuine whistleblowing disclosures via this route. Both instances were followed up with an internal investigation and one additionally had a third party investigation visit by the responsible sourcing team to ensure that remediation had been completed. The incident was concerning allegations of bullying and there were not any forced labour indicators involved. We continue to ensure that the poster is displayed during all supplier visits. We also take the opportunity during worker listening groups, completed routinely as part of our Responsible Sourcing audits, to check [workers] awareness of this mechanism and explain its purpose.

## What's next?

It is three years since we published our Responsible Sourcing Handbook. We delayed the planned update of the handbook in FY25 while we focused on updating our risk assessment approach, so we will be undertaking an update of this document during FY26 when we will also review our implementation guidelines to ensure that they reflect current best practice.



## Governance

Acting responsibly and sustainably is at the heart of our business and five years ago we formally launched our sustainability strategy, Our Better World Pledge. This strategy outlines how we ensure that we operate our business sustainably and ethically whilst also applying high standards of governance. The Board, led by the Chair, Ian Burke, has ultimate responsibility for our sustainability strategy including our approach to uphold human rights and prevent modern slavery. Our Sustainability Committee meets at least three times a year to review and approve the implementation of Our Better World Pledge. The Executive management team is supported by a number of management committees that oversee different areas of the agenda. The Responsible Product Committee, which meets approximately every eight weeks, is responsible for developing the strategy for managing the environmental and ethical impacts of our products in our value chain which includes Human Rights. Our Sustainability Committee and Executive Management Team receive an annual briefing on our modern slavery risks and our strategy.

### Sustainability Governance

#### Plc Board of Directors

- Approves strategy and reviews progress
- Focus on topics that feature on the principal risk register
- Approves policies and external disclosure

#### Sustainability Committee

#### Executive Management Team

- Defines strategy
- Reviews progress
- Agrees large projects and costs
- Business integration

#### Sustainability Management Committees and associated groups

##### Climate Change & Waste Committee

##### People Leadership Team

##### Responsible Product Committee

##### Pet Committee

##### Pets Foundation

- Idea generation
- Operational delivery
- Project management
- KPI development
- Progress tracking
- Chaired by a member of the Executive Management team or a Director
- Risk Management

Our Responsible Product Committee uses a product sustainability framework to support the implementation of our environmental and social requirements across our teams and with our suppliers. Supply chain human rights is a key workstream under the products sourced responsibly pillar.

### Internal Responsible Sourcing Resource

A dedicated Responsible Sourcing Manager role has been in place since 2021, and is embedded within the technical and product development team while also working closely with the Sustainability Director and the Company Secretary on our Group wide Human Rights strategy and approach. Reporting into this colleague is the Sustainability lead who supports the implementation of our Responsible Sourcing strategy for suppliers managed from the UK offices. The role of Ethics and Sustainability lead, based in our Hong Kong sourcing office, has been in place since April 2024. This colleague is experienced in Human Rights and Ethics and responsible for conducting Responsible Sourcing audits and any required remediation in factories in that region and for implementing our Responsible Sourcing strategy. The Sustainability Director has overall responsibility for the Human Rights strategy.



# Due Diligence

## Ethical Audit Programme: Own label products

We require new and high risk suppliers to undergo third-party ethical audits which assess labour standards, health & safety and environmental compliance. All suppliers have to provide a third-party audit at a maximum interval of 24 months. We work closely with our suppliers to close out areas of non-compliance. However, we recognise that these audits are not always the most effective tool in identifying the most egregious human rights violations and so we have launched a programme of Responsible Sourcing audits conducted by our in-house Responsible Sourcing and Compliance Manager and Ethics and Sustainability lead based in our Hong Kong Sourcing Office. These audits may be completed instead of, or in addition to a third-party ethical audit. They will include current and prospective factories. The aim of these Responsible Sourcing audits is to not only assess and improve labour conditions in our suppliers' direct operations but to support capacity building for identifying and mitigating human rights and environmental risks upstream in our supply chain.

## Data

We are a retailer member of Sedex. Sedex enables us to manage our audit data and corrective action plan close out more efficiently. We are linked with suppliers who are SEDEX members, we use the risk tool and forced labour reports to support our prioritisation of supplier visits and provide insights to our suppliers on key sourcing risks. We have rolled out our new collaboration supply chain platform CBX which enables us to manage the end-to-end product and supplier compliance process more efficiently and control data much more effectively.

Both these tools enable us to record more information about our suppliers and the makeup of their workforce. This insight enables us to understand more about the people in our supply chain so we can focus support and compliance activity on those that are most vulnerable.

	FY25	FY24
Number of third-party audits completed and reviewed	<b>112 covering 112 sites</b>	117 covering 117 sites
Number of Responsible Sourcing audits completed	<b>76 covering 74 sites</b>	32 covering 32 sites

## Audit results

We were able to reinstate in house audits in China from August 2023, after two years of COVID travel restrictions into China. Our Responsible Sourcing Team have been able to implement the planned approach of supplementing our third-party audit requirements with more effective in house visits. As detailed in our 2024 Modern Slavery Statement, our first 10 audits to current and prospective factories, eight factories had a range of findings identified

These findings included excessive working hours, minimum wage violations, double books, undocumented temporary workers, undisclosed accommodation and health and safety issues. In the prospective new factories feedback was provided and they were not progressed to on boarding. The current factories have had all issues remediated or we have since exited these factories for commercial reasons after remediation had been completed.

Audits that have been conducted since then and during the reporting year of 2024/25 have not uncovered any findings that we classify as being zero tolerance or relating to modern slavery indicators.

A series of visits to a supplier based in China, between May and July 2025, which is after the reporting period of this statement, who supplies branded product and own brand products have uncovered zero tolerance findings in relation to health and safety, unauthorised sub contracting and one incident of a child found working in an unauthorised sub contracted site next to his mother in an unauthorised sub contracted unit. The details of these incidences and our response are covered in the risk section of this statement on page 7.

## Internal audit of our human rights approach

Our internal audit team commission an audit on our human rights and modern slavery approach on a cyclical basis, it is delivered by our external audit partner. An audit was carried out during 2023 which was five years after the previous audit. Additionally in 2020 we engaged an external consultancy to produce a review and assessment of salient human rights risks. The audit of 2023 was an incredibly helpful exercise which we have used to inform our priorities and work since then. Included in these findings was the recommendation to increase internal resource which was actioned and a recommendation to maintain an up to date risk assessment which was presented to management committees in September 2023 and has subsequently been updated again in July 2025. Details of this can be found in the Risk section of this statement on page 7.

## Risks

During 2025, we have updated our risk classification and risk rating approach. This now takes account the inherent risk connected to specific geographic locations and manufacturing processes or industries alongside the actual risk identified during audits. To enable internal audit resource to be allocated on a risk basis an updated on boarding process has been developed which applies this risk classification approach to new and existing regions and factories. On this page we detail our highest risks which we have updated following this review of our risk approach which we will be progressively implementing during financial year 2025/26.

### Unauthorised Subcontracting

To ensure that human rights are safeguarded, it is imperative that we know where our products are made. This ensures that we have approved the site for production. Unauthorised subcontracting is a particularly high risk given the heightened exposure and potential for poor labour standards and exploitation to occur in hidden supply chains. For this reason we have communicated a approach to unauthorised subcontracting to our suppliers.

Visits to a supplier in China between May and July 2025 who operates from a number of factories identified unauthorised sub contracted factories that were being used to complete part of the production. This was in relation to specialist processes such as embroidery and the making of pom poms.

Following these visits there have been a number of follow up meetings and the supplier has shown a transparent and collaborative approach and we have jointly agreed the corrective action plan. This includes undergoing a mapping exercise to ensure that they have full visibility of the supply chain and factories involved in all stages of the process and reviewing their policies to support this piece of work.

In line with our remediation approach we will be monitoring this progress closely.

### Child labour

Child labour remains a high risk in our supply chain driven by the root causes of poverty, limited access to quality education and a lack of decent employment opportunities and childcare for working adults. Furthermore, displacement caused by armed conflict, climate change and environmental disasters is predicted to fuel an increase in migration, which we know will put even more children at risk of exploitation. We have comprehensive processes and procedures in place for preventing, improving detection of and responding to child labour.

This includes a **Child Protection Procedure** which provides clear guidance and actions to be taken in the event of identifying or suspecting child labour. We have also developed detailed supplier guidance within our Responsible Sourcing Handbook to support our suppliers in assessing child labour risk in their own operations and lower tiers of the supply chain. To ensure we keep up to date with the latest information and insights relating to child rights, we have been members of The Centre for Child Rights in Business (CRIB) working group and have attended various sessions. The working group brings together brands to collaborate and share best practice and also enables us to access The Centre's rapid response service.

The supplier visits described in this statement led to the discovery of a child who was sitting alongside his working mother and was helping her complete the hand finishing of the embroidery process at an unauthorised sub contracted site. This demonstrates the vital importance of having full visibility of all locations that are involved in manufacturing our products. We were able to establish that the child was present because it was during the school holiday period when the mother didn't have childcare. This is a very serious finding and we are working with the supplier on ensuring full visibility of production sites which then enables robust labour standards to be in place that would minimise the risk of this situation or other human rights issues occurring going forward.

### Migrant labour, recruitment fees and informal employment

We have not found any further instances of migrant workers paying for work costs since the finding in Thailand that we included in our 2023 and 2024 MSA statement. Our requirements on responsible recruitment practices aligns with the employer pays principle. We worked with the supplier to ensure that workers were compensated for any direct costs they incurred through the initial recruitment process or when work permits require renewal. We have now managed a responsible exit from this supplier.

### What's next?

We will continue our programme of in house audits across our existing factory base in China, while also visiting prospective countries and to continually prioritise our efforts on a risk based approach.

These audits are a critical element of our due diligence process.



## Training

All our support office colleagues are required to complete our bespoke online training course on modern slavery. Completion of mandatory training, which includes this module, forms part of all colleagues personal objectives.

The UK Quality and Technical teams and commercial teams received an insight sessions from our Responsible Sourcing Manager in July 2025.

In November 2024 colleague face to face training took place in our Hong Kong office. Training primarily focussed on the Pets at Home Responsible Sourcing policy as detailed in the Responsible Sourcing Handbook and had a particular focus on the zero tolerance issues. All colleagues from this office joined the training.

At factory visits conducted by the Responsible Sourcing lead, training has been provided to highlight our requirement for transparency, openness and integrity and to ensure there is an understanding of our zero tolerance issues. During the year this has taken place at 44 factories reaching over 100 factory managers and HR staff.

Our UK Supplier Conference in September 2024 included Human Rights as one of our six key asks of suppliers in terms of responsible sourcing.

Our Responsible Sourcing Handbook provides best practice guidance to suppliers and also signposts to training resources. As we conduct our own Responsible Sourcing audits, we set specific action plans where training needs are highlighted.

### What's next?

#### For our colleagues

**We will update our mandatory training module for all colleagues and continue with targeted training for priority colleague groups.**

#### For our suppliers

We will continue with our modern slavery training developed for suppliers managed from our Hong Kong sourcing office. This will be delivered by Ethics and Sustainability lead based in that office.

Human Rights will continue to be one of our six priority requirements for our suppliers and will be included in the Responsible Sourcing session at the Supplier Conference in 2025.

## Partnerships & Collaboration

**We recognise the importance of collaboration and partnerships for sharing insights and developing industry best practice for tackling modern slavery.**



We are an active member of the British Retail Consortium's (BRC) Ethical Labour Working Group. This group is part of the BRC's wider CSR Community and provides a platform for retailers to share insights, influence policies for industry and facilitate engagement with UK Government and regulators. We have various sessions including one in June 2025 about mandatory human rights disclosures hosted by the ETI.



In the past we have attended sessions hosted by the Seafood Ethics Common Language Group. This group brings industry and other stakeholders together to discuss the key ethical issues faced by the international seafood industry including human trafficking, labour abuses, child labour and recruitment fees. This is an area we have been focused on since we discovered the use of recruitment fees in a factory in Thailand manufacturing pet food using fish as a main ingredient.



Sedex helps us assess and manage social and environmental supply chain risks. Sedex also provides a community for collaboration in the development of guidance, tools and industry standards.



We have become members of the Modern Slavery Intelligence Network. We have also joined an informal network event hosted by the Greater Manchester Modern Slavery network, co-ordinated by Stronger Together and joined local events in Manchester which have enabled us to build a network of Manchester based businesses. We have had meetings with various organisations as we have sought to identify potential future partners including Stronger Together, Unseen, the Slave Free Alliance and the ETI.

### What's next?

We will continue to engage in partnerships and collaborative opportunities that help us to understand best practice and improve our approach to modern slavery risks.



## Looking Ahead

**We are committed to identifying and addressing modern slavery and human rights risks in our business and throughout our supply chain. Within this statement we have highlighted the key priorities for the financial year ahead which includes: Updating our Responsible Sourcing handbook; updating our mandatory modern slavery training for all colleagues; continuing modern slavery training with our suppliers; our ongoing program of Responsible Sourcing audits for suppliers managed from our Hong Kong sourcing office and our UK office.**

The Pets at Home Group PLC Board of Directors approved this statement at a meeting of the Board on 17 September 2025.



**Ian Burke**

Interim CEO

This statement applies to Pets at Home Limited and Companion Care (Services) Limited, which fall within the scope of section 54(2) of the Modern Slavery Act 2015.

