

Human Rights and Modern Slavery Statement

2023/24



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Introduction

This statement is published in accordance with human rights and modern slavery regulations in the following markets in which IVC Evidensia operates:

United Kingdom Modern Slavery Act (2015)

Norwegian Supply Chain Transparency Act (2022)

Canada Fighting Against Forced Labor and Child Labour in Supply Chains Act (2024).

The statement outlines the steps IVC Evidensia has taken to assess and reduce the risk of slavery and human trafficking occurring within our business and supply chain during the financial year ending 30th September 2024. The statement outlines our ongoing commitment to continue to mitigate the risk.

Slavery, servitude, forced labour, bonded labour, and human trafficking are issues of global concern, affecting all sectors, regions, and economies. Modern slavery is a crime and a violation of human rights and is not tolerated in any part of our business or supply chains.

We are committed to ensuring that the human rights and dignity of all who work in our global business and supply chains are properly respected. The prevention, detection and reporting of modern slavery throughout our business and supply chain is a core part of this commitment and is the responsibility of everyone at IVC Evidensia.

We accept our responsibility to support transparency; to find and resolve problems, to regularly review our business practices, and to collaborate with others to protect the rights of workers, particularly those who are most vulnerable to abuse such as modern slavery. As our business continues to grow, we will undertake ongoing assessment and improvement of our processes to ensure that they are appropriate and to ensure that we comply with the laws wherever we operate.

The data included in this statement covers IVC Evidensia’s financial year to the 30th September 2024 and covers all of our owned operations unless otherwise stated*. This Statement has been approved by the Group Board of IVC Evidensia Group.



Simon Smith
Group CEO

30 May 2025

*This statement is made by IVC Evidensia group that includes companies mentioned in Appendix 1



About IVC Evidensia

Founded in 2011, IVC Evidensia has grown to become an expansive network of around 2,500 veterinary clinics, hospitals and out-of hours centres, with a presence across 19 countries within the UK, Europe and Canada. We are currently the second-largest veterinary group in the world, and the largest in the UK, Europe and Canada.

Our vision is to be the best veterinary group in the world, focusing on our purpose – Healthy Animals, Happy Owners.

This is underpinned by our three promises: our people promise to be a great place to work; our customer promise of world-class veterinary care, delivered locally; and our sustainability promise to be a force for good. Our values – We Care, We Dare, We Share – guide us in how we want our people, customers, suppliers, partners and the wider world to experience IVC Evidensia, providing a framework for our actions and decisions.

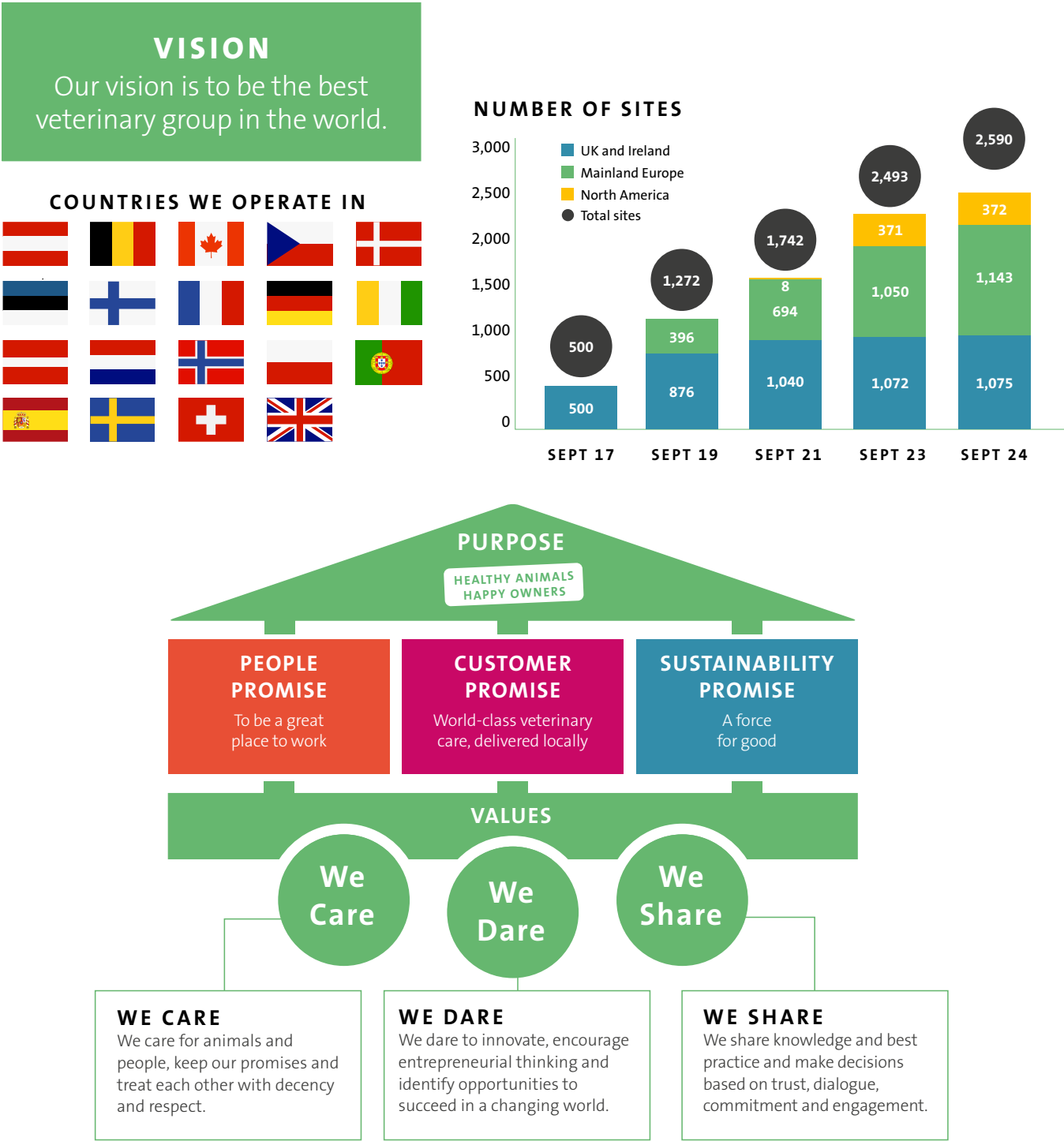
Together, our purpose, promises and values help connect and inspire us as we continue on our journey to become the world's best veterinary group.

Our size and global scale enables us to invest for the benefit of our people, the animals they care for, our customers and the planet. Our scale also enables us to invest significantly into our systems, facilities and people.

In addition to our veterinary clinics and hospitals, the term “IVC Evidensia” as used in this statement refers collectively to IVC Evidensia and its group companies which cover other services including pet crematoriums and clinical waste disposal, pet pharmaceuticals, and direct debit services.

We provide veterinary care for around 10 million animals every year. Our animal patients include companion animals, such as domestic cats and dogs, as well as exotic animals such as reptiles. We also provide veterinary services to the farming community, and our equine vets care for horses. The veterinary sector plays a vital role in safeguarding both animal and human health. We provide essential services to pet owners, farmers, food producers and governments, helping to maintain animal welfare and a healthy food chain. We're dedicated to addressing crucial public health and environmental challenges, from promoting responsible antibiotic use and combatting antimicrobial resistance, to advocating for infection prevention and publicly championing animal welfare issues.

The Group employs over 39,000 people working part and full-time across veterinary clinics and hospitals, crematoriums, warehouses and support offices throughout the UK, mainland Europe and Canada. Our veterinarians and veterinary nurses are registered with the relevant regulatory body in the country in which they are practicing. The majority of our employees are employed on permanent contracts.



Our commitment to sustainability

Our Positive Pawprint sustainability strategy supports our core objectives to protect the health and happiness of people and animals, while reducing our environmental impact to promote a cleaner and more sustainable environment. The strategy is based on three pillars: People, Planet and Patients, each underpinned by commitments, KPIs and performance targets. Our People strategy includes our commitment to ensure human rights are respected across our value chain.

The strategy is led by our Group Sustainability and ESG Director and by our Positive Pawprint Steering Committee, with representatives from across our key business functions and countries. Our Group CEO has accountability for sustainability

issues at Executive board level and Non-executive director, Chris Hadley has overall accountability for sustainability on the Group Board. We have developed policies for the key aspects of our sustainability programme, available at [ivcevidensia.com/PositivePawprint](https://www.ivcevidensia.com/PositivePawprint). To guide and support the ongoing development of our sustainability strategy, we undertake regular materiality assessments to ensure that our strategy continues to focus on those environmental and social issues of most importance to our stakeholders, and which represent the most important risks and opportunities for the future of IVC Evidensia. A detailed report on our sustainability performance and approach is published in IVC Evidensia’s 2024 Sustainability Report.

Our Supply Chain

We are committed to building strong collaborative partnerships with our suppliers as a mutually beneficial and inclusive way to ensure responsible and sustainable business throughout our supply chain. We seek to work with our suppliers to engage and communicate our expectations, and to support them on a journey of continuous improvement, an approach which we strongly believe can benefit us, our suppliers and all communities where we operate.

We spend over £1.6 billion a year through our supply chain. Over 70% of our contracted spend is with less than 20 supply chain partners. The largest product category we buy is pharmaceuticals, making up over 70% of our spend. The suppliers of these products tend to be large international corporations based in the UK, Europe and North America. We have a small portfolio of white label veterinary pharmaceutical and nutraceutical products.

The Group has centrally negotiated procurement contracts across the main procurement categories. In our largest markets, we partner with wholesalers for the supply of veterinary pharmaceuticals and other consumables to our clinics.

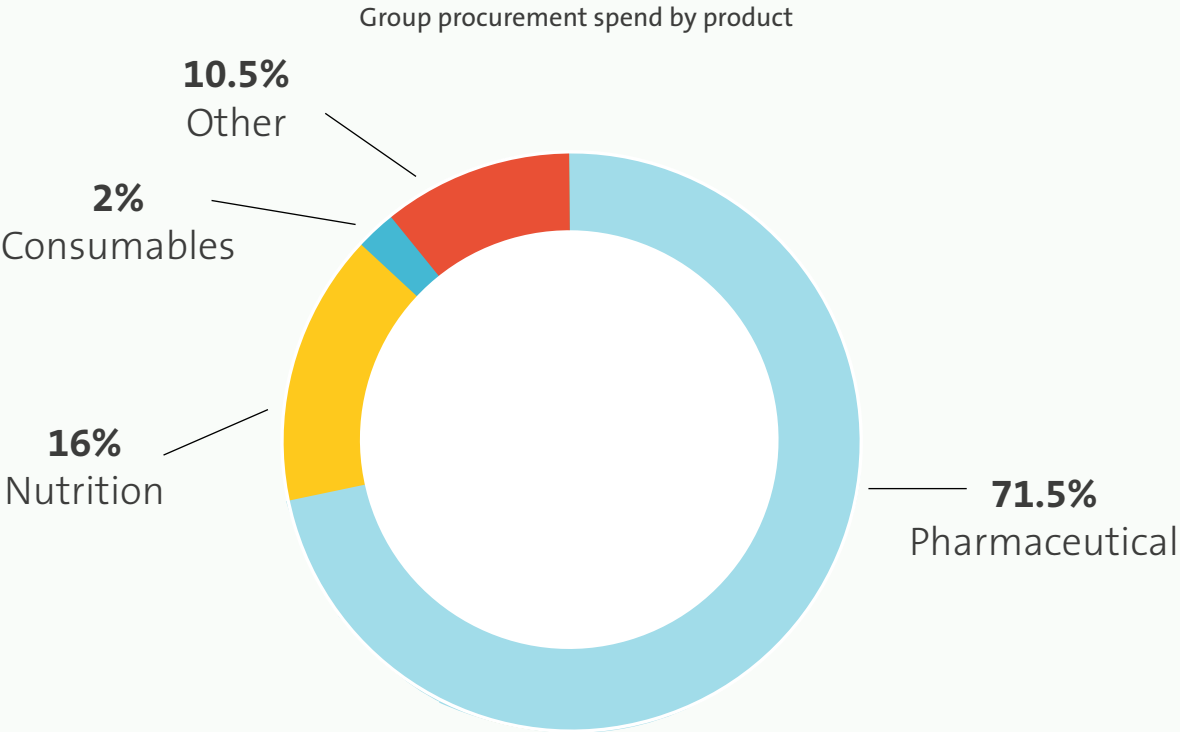
In those markets where there are wholesaler arrangements in place, the Group has direct supply contracts in place with the major suppliers of veterinary products (e.g. pharmaceuticals, nutrition, lab, medical consumables) and these are negotiated at Group level with the contracts being either at Group or country level.

In addition to pharmaceutical and nutrition products, we buy goods that support the operations of our practices and hospitals and the provision of services to our clients. These include medical consumables and equipment, office supplies, marketing materials, IT hardware and software, clinic fixtures and fittings, uniforms and vehicles. We also procure a range of services, covering areas including cleaning, maintenance, fit out, waste management, distribution and recruitment for permanent and temporary staff.

The supply chain for these items is much more varied and includes both SMEs all the way up to multi-national companies with some contracts negotiated at regional level and others at country or clinic level. A key strategic focus area is the consolidation of the supply chains within these categories.

The Positive Pawprint Growing our company as a force for good

Caring for People	Caring for Planet	Caring for Patients
Protect and promote the health and well-being of our teams	Transition our company towards net-zero climate impact	Deliver the highest possible standards of care quality and safety
Offer the highest standards of client care and communication	Minimise our waste footprint through optimal management	Promote and innovate integrated animal health solutions
Create welcoming, diverse and inclusive workplaces	Train all clinicians on applied sustainability in veterinary care	Continually grow our clinical knowledge and skills
Empower clinics to contribute to their local communities	Evolve industry-leading sustainable procurement practices	Continually share knowledge, incidents and best practice
Ensure human rights are respected across our value chain	Practice leading standards of chemical and pharma management	Collaborate with peers to innovate best practice on antimicrobial resistance
Governance Management, Transparency and Disclosure		



Strategy & Governance

Strategy

IVC Evidensia is committed to respecting human rights in our business operations and supply chain as set out in the United Nation’s Universal Declaration of Human Rights; the United Nation’s Guiding Principles on Business and Human Rights; and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

Our actions to mitigate against the risk of modern slavery are structured around five key areas:

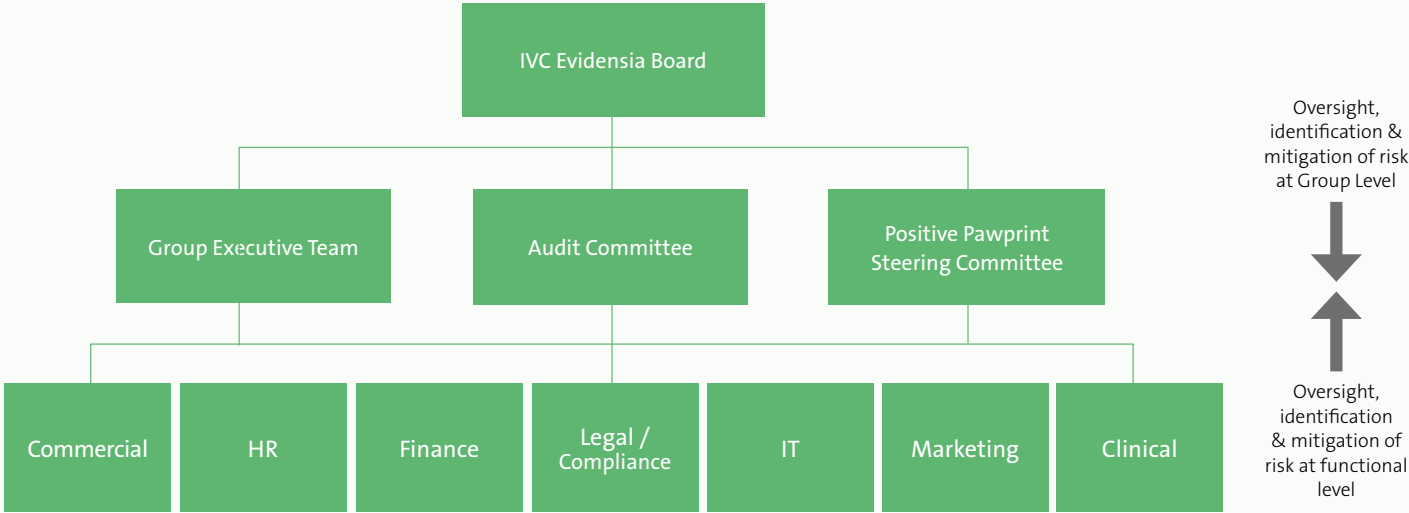
- Developing and implementing robust policies and governance procedures;
- Identifying and assessing risks of modern slavery in our operations and supply chains;
- Due diligence within our business operations and supply chain
- Developing and monitoring key performance indicators.

Our statement covers each of these in turn.

Governance

The IVC Evidensia Group Board has overall responsibility for the management of sustainability issues, including those relating to modern slavery and wider human rights, and receives an update on the effectiveness of our strategy and risk management at least once per year. The Positive Pawprint Steering Committee meets quarterly and leads the development and delivery of the Positive Pawprint, our sustainability strategy, monitoring ESG risk, outlining KPIs and targets and measuring performance. As part of this remit, the Committee is responsible for overseeing the Group’s strategy related to management and mitigation of risk related to human rights and modern slavery.

Our Group Commercial Director has overall responsibility for our approach to modern slavery, working closely with our Group Sustainability and ESG Director and Legal team. The Group Executive Team are responsible for the day-to-day compliance and oversight of operations. A number of departments and functions are responsible for the devising of policies and processes which will support IVC Evidensia’s human rights responsibilities, including HR, Legal, Compliance and Commercial.



Policies & Principles

IVC Evidensia has implemented policies and governance measures to support our efforts to combat modern slavery and human trafficking. These policies are reviewed annually as part of our governance programme.

Code of Ethics (Employees)

Our Global Code of Ethics highlights our zero-tolerance approach to modern slavery, and our commitment to implement effective systems to mitigate the risk of modern slavery and ensure there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

Our Code of Ethics encompasses our cultural values and principles clearly stating the behavioural standards and expectations we have of our employees and associated persons. The first principle of the Code is our commitment to respect people and animals.

Our Code makes it clear that the prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of everyone at IVC Evidensia.

IVC Evidensia employees are required to stay alert for any behaviour that might suggest modern slavery.

Our Code of Ethics can be found here:
<https://ivcevidensia.com/policies/>

Code of Conduct (Suppliers)

Our Supplier Code of Conduct includes our key principles and rules of engagement as well as our standards and expectations.

Key principles

We expect our suppliers to follow these principles:

- Comply with all applicable national laws and regulations
- Adopt a responsible and ethical approach to business & sourcing
- Ensure high standards of animal welfare
- Uphold and protect labour & human rights
- Prevent forced labour, and modern slavery
- Manage and reduce environmental impacts
- Identify and manage supply chain risks

The Code also includes a declaration which requires the supplier to acknowledge that they will adhere to our requirements and ensure appropriate actions are in place.

The Code of Conduct for suppliers can be found here:
<https://ivcevidensia.com/policies/>

Supplier Assessment

We operate a risk-based supplier assessment process to complement our Supplier Code of Conduct. We use the supplier assessments to make more informed decisions when selecting preferred suppliers.

We are working with the EcoVadis assessment tool to further strengthen our supplier assessment process.

Procurement Policy

Our Procurement Policy seeks to ensure that the processes in place to acquire our products and services are efficient, transparent, and in line with regulatory and ethical requirements with clear accountability. The policy was revised and reissued in March 2025.

The procurement policy includes: standards, requirements, approval thresholds, authority, management, due diligence, risk assessment, resilience planning, legal requirements, contract end, change management and reporting.

Completion of our Supplier Assessment Process forms part of these requirements.

Speak-Up Policy

We have a Speak-Up (Whistleblowing) policy and several channels for employees to raise concerns, including about any suspected human rights or modern slavery issues. The policy reinforces our commitment to zero tolerance of any retaliation for raising a concern in good faith.

Human Rights Policy

Our Human Rights Policy is focused on ensuring that we support and respect all internationally recognised human rights and ensure that our colleagues and business partners are informed of our commitment to human rights and adhere to our expectations in this area.

Our Human Rights Policy can be found here:
<https://ivcevidensia.com/policies/>

Grievance Policy and Procedure

Our Grievance Policy provides employees with the key information they need to know if they wish to raise an issue at work, and the Grievance Procedure outlines what process will be followed by managers, including links to relevant template letters and support for line managers.

Anti-Bribery, Corruption & Fraud Policy

Our Anti-Bribery, Corruption & Fraud Policy state IVC's expectation of all employees to comply with anti bribery and fraud legislation and provides guidance on warning signs to look out for.

Breaches and Non-compliance

IVC Evidensia will not tolerate forced labour, slavery or human trafficking within our operations or supply chain. If we identify, or are made aware of, any non compliance then we will work with our suppliers to address these unless the risk is such that we feel that we cannot continue with the relationship. In those instances where we give suppliers an opportunity to address concerns but effective action is not taken within the agreed timescale then we may terminate the contract.

Employees who breach the principles set out in our policies may be subject to disciplinary procedures.



Risk Assessment & Due Diligence

Risk Assessment

We conduct ongoing reviews to evaluate the nature and extent of our exposure to the risk of modern slavery across our international business. We look specifically at the modern slavery risk in the territories in which we operate and from where we source, alongside the risk associated with particular product categories or services. We use the risk assessment to identify where additional due diligence or controls may be required.

As part of our risk assessments, we refer to information from a number of sources including:

- The Global Slavery Index to provide context on country and sector risks
- Supplier risk assessments carried out through our procurement due diligence process
- Reports from our Speak Up line – to date, no cases of human trafficking or modern slavery have been reported

Our analysis against the 2024 Global Slavery Index indicates that IVC Evidensia operations and our key suppliers are based in countries with a low prevalence of modern slavery driven by strong governance and strong government responses to modern slavery. While this suggests the level of risk is low, it is important that we remain vigilant and ensure that our teams are aware of the potential risks and are trained on how to spot the signs of modern slavery.

In terms of risk within our own operations, the fact that a high proportion of our clinical employees are high skilled and independently registered by professional bodies means that the risk of modern slavery or human trafficking is low. Our risk assessment indicates that one of the greatest potential risks areas is associated with temporary staff, for example those employed within our crematorium operations or in the provision of distribution services, and also with local contractors providing services, such as gardening and window cleaning, to our clinics.

We continue to improve our understanding of the risks in this area and to ensure that our clinic teams have training and guidance to recognise the risks and respond appropriately.

Within our supply chain, we know that certain industries are associated with higher prevalence of modern slavery and refer to the Global Estimates of Modern Slavery report in assessing this risk, categorizing suppliers involved in manufacturing and agriculture as having higher modern slavery risks. In these

industries, as well as in other parts of our supply chain, we also know that migrant workers are at greater risk of modern slavery or human trafficking and this is therefore an area for particular vigilance.

Our focus continue to be ensuring we have the appropriate policies in place, supported by training and that we set the standards for supplier relationships focused around our Supplier Code of Conduct.

The consolidation of our supply chain is a strategic priority for the Group. As we continue to make progress with this work, this will give our Group Procurement team a greater oversight of our suppliers and stronger relationships with our key partners, helping us to improve our assessment of the risk, both related to country of manufacture/operation and manufacturing activity. This will enable us to ensure that our controls and supplier engagement are focused on the right areas.

Due Diligence

Our Supply chain

We are committed to working with our suppliers to tackle the risk of modern slavery, with a particular focus on engagement, awareness and supplier due diligence.

Our Supplier Code of Conduct sets out the key principles and behaviours we expect our suppliers to agree to and work within. This has been formally communicated on a priority basis according to spend, sector, location and other risk factors as part of our supplier due diligence process. It includes an expectation that all employees in our supply chain are always treated fairly; ensuring their working conditions, working hours and wages always comply with the UN International Labour Organisation (ILO) standards. To date, suppliers accounting for over 89% of our overall centrally-contracted spend have signed up to our Code or provided their own equivalent. Our objective is that, by the end of 2025, suppliers representing at least 95% of spend will have committed to our Code of Conduct.

Our electronic Supplier Assessment Process is used for all new suppliers going through the Group tender process. We take a tailored approach to ensure the process is relevant and reflective of supplier size, sector and location and includes an affirmation from the suppliers that they have received, reviewed and understood it, and that the information they have provides is a true and accurate reflection of their operational approach to complying with the Modern Slavery Act 2015.

We are using our risk assessment findings to ensure our Supplier Assessment Process focuses on suppliers operating in the high-risk locations and sectors.

Spotlight on Human Rights within IVC Evidensia Supplier Assessment Process

As part of our Supplier Assessment Process, we require suppliers to provide data on the following areas:

- Policy to ensure that slavery and human trafficking does not exist in own operations or supply chain
- Disclosure of any cases of modern slavery or human trafficking
- Management & employees trained on modern slavery and human trafficking
- Independent audits of own operations and suppliers
- Procedures for managing non-compliance, and adequate grievance process

Through the application of a standardised and automated system, we are able to identify and assess high-risk supplier categories across all of our businesses, and not limit our approach to specific perceived risk areas. A range of issues are covered as part of the assessment, covering areas including bribery and corruption, environmental risk, governance and human rights, with detailed information required on the approach suppliers take to minimise risks of modern slavery within their organisations.

Our Enhanced Supplier Evaluation is used for those suppliers that are perceived high risk due to size, sector, location or strategic importance. These evaluations include physical audits and management interviews to provide more in-depth analysis of supplier processes and procedures. This is used for white-label suppliers, as well as for other supplier partners as appropriate.

In order to further strengthen our supplier due diligence process, we have established a partnership with EcoVadis to introduce a dedicated ESG risk assessment and due diligence tool, which will enable us to gather more in-depth information from a wider range of suppliers, improving our understanding of modern slavery and other ESG risks, and helping us to target our supplier engagement.

EcoVadis offers an internationally recognised sustainability ratings system which will help to provide greater insight on the environmental and social impacts within our supply chain and to support both IVC Evidensia and our suppliers to pinpoint those areas where improvements can be made to improve environmental or social impact, and support regulatory compliance. We are asking all of our suppliers to collaborate with us on this initiative and engage with EcoVadis to undertake a sustainability ratings assessment. Following training for our Group Commercial team, the project was launched in March 2025.

All suppliers will be asked to participate in the EcoVadis assessment, starting initially with top 500 by value. Suppliers will receive a customized sustainability rating from EcoVadis offering detailed insights into their strengths and improvement areas as well as a benchmark with industry peers.

Some suppliers will be asked to participate in improvements based on a corrective action plan after their assessment is finished, supporting both IVC Evidensia and our suppliers to improve our sustainability practices in our organizations and along our supply chains.



Training & Awareness

We recognise the importance of training our employees so that they are able to recognise the signs of modern slavery and the actions they should take if they have any concerns. Our Group Learning Management System is our digital educational platform. This has now been rolled out across our Group. Training is provided in multiple languages covering a wide range of areas, including clinical topics, client communication and well-being support. We use this tool to educate our employees on how to recognise the risks of modern slavery and human trafficking within our business and supply chains.

Modern slavery training forms part of our new starter induction within mandatory training courses on ‘Respecting People and Animals’ and our Group Code of Ethics. This includes training for all colleagues covering the following areas:

- Defining what we mean by modern slavery and human trafficking
- Identify risk factors and warning signs of modern slavery
- Explaining IVC Evidensia’s policies and requirements from our suppliers
- Actions that should be taken if they feel an individual is at risk of modern slavery or human trafficking

We shared specific modern slavery guidance for our Group Executive Committee and Group Leadership Team for cascade through the leadership teams in each country we operate in. In addition, we shared guidance for personnel in higher risk roles where they have direct involvement in our recruitment processes or with suppliers. This included country HR Managers, our Group Procurement teams and country procurement leads. The guidance reminded our colleagues of the factors which could suggest a risk of modern slavery and human trafficking, together with the steps to report any concerns they may have. Guidance was also shared with our practice leadership teams in our two largest markets, UK and Canada, to outline the steps to be taken when engaging and dealing with small local suppliers, our expectations and how to report any concerns.

In the year ahead, we plan to update our core training on modern slavery and human rights and re-issue this to all colleagues.

Monitoring effectiveness

We continue to monitor the effectiveness of our policies and processes to prevent modern slavery. This year we have reviewed the KPIs we use to track our progress to ensure we are tracking the areas most appropriate to our global business and addressing key elements of our modern slavery controls. Performance against these KPI measures will be reviewed by the Positive Pawprint Steering Committee and by the Group Audit and Risk Committee which is a sub-committee of our Board.

We monitor and evaluate the following KPI metrics:

KPI	FY23/24 performance
% Group centrally-contracted suppliers signed up to IVC Evidensia Code of Conduct or provided own equivalent	90%
% Group Executive Committee trained on modern slavery awareness	100%
Modern slavery issues reported via whistleblowing line	None
Modern slavery issues identified through supplier due diligence process	None



Priorities for the year ahead



Organisational Structure & Supply Chain	Continue to consolidate the Group supplier base to support better implementation of governance processes, risk assessment and due diligence.
Policies & Principles	Communicate whistleblowing facility to suppliers and contractors.
Risk Assessment & Due Diligence	Continue rollout of EcoVadis risk assessment and due diligence system to provide more in-depth information on modern slavery and ESG risk across a wider number of suppliers.
Training & Awareness	Re-launch mandatory modern slavery training via Learning Hub for colleagues in all countries.

Appendix I

The following companies are commercial organisations which are part of the IVC Evidensia Group and which carry on business in the UK, where business gives rise to global turnover of more than £36 million:

- Independent Vetcare Limited
- Vets Now Emergency Limited (indirect subsidiary of Independent Vetcare Limited)
- VetStrategy Canada Holdings Inc

