

Anti-slavery and human trafficking statement

1: Opening statement from the Group CEO

IVC Evidensia is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

Steve Clarke (CEO)

Slavery, servitude, forced labour, bonded labour, and human trafficking are issues of increasing global concern, affecting all sectors, regions, and economies. Modern slavery is a crime and a violation of human rights and fundamentally unacceptable within our business and supply chain. Combatting Modern Slavery is an important element of our overall approach to business and human rights. We are committed to respecting, protecting, and championing the human rights of all those who come into contact with our operations, including employees, supply chain workers, customers and local communities.

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 abuses such as modern slavery

The IVC Evidensia Code of Conduct

In our recently published Code of Conduct we have a zero-tolerance approach to modern slavery, and we are committed to implementing effective systems to ensure modern slavery is not taking place anywhere in our group or our supply chain. We are also committed to ensuring 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.

2: Structure of the Organisation – About IVC Evidensia

IVC Evidensia is a privately owned limited liability company registered in England and Wales. It is a European provider of Veterinary services. The term IVC Evidensia as used in this statement refers collectively to IVC Evidensia and its group companies. The Registered Head office is in Keynsham and we have a distribution centre located near Bristol for our online pharmacy business. We have Practices throughout the UK. The Group has a global annual turnover of £1,306 Million and employs around 20,000 people working in around 1600 Practices and support offices in the UK & Mainland Europe working both full and part time and on contracts.

Our practices are in twelve European countries. Each country is supported by corporate functions providing services in Human Resources, Finance, Marketing, IT and Supply Chain.

Over the last few years, the business has grown significantly and widened its operations meaning we need to continue to risk assess and review our broadening supply chain for risk

To find out more about the nature of our business, please click ivcevidensia.co.uk

Location of supply base is predominantly in European countries where the perception of corruption is considered low on the Transparency International Corruptions index. In order to provide veterinary services, we work with a range of suppliers. We divide our Supply Chain in to three separate areas

1. Products we purchase to provide Veterinary services in our Practices and hospitals
2. Products for re-sale on our websites including own brand and third party brands

3. Non Stock items and services, including outsourced deliveries, logistics, technology, cleaning and catering (non stock)

The Group has centrally negotiated procurement contracts in place across the main clinical categories. All the veterinary pharmaceuticals are purchased through three wholesalers (under direct supply agreements. In addition, to the Group's agreements in the United Kingdom, the Group has pan-European agreements with its key suppliers across Europe. Consumables, equipment, servicing laboratory and crematorium agreements are negotiated centrally and largely comprise of direct supply arrangements.

3: Policies

As part of our commitment to combating modern slavery, we are in the process of updating and implementing the following policies:

- Code of Conduct (Business Ethics)
- Modern day Slavery policy
- Procurement policy (Launch 2021)
- Supplier standards (Launch 2021)
- Speak up Policy (Launch 2021)

We also make sure our suppliers are aware of our policies and adhere to the same high standards.

4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures and will continue to reevaluate as our business interests widen

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistle-blowers

5: Risk and compliance

IVC Evidensia is continuing to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;

- evaluating the modern slavery and human trafficking risks of each new supplier at group level;
- conducting supplier audits or assessments of major group suppliers, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

IVC Evidensia attaches real importance to the welfare of our employees and those employed by our suppliers.

During 2021, IVC Evidensia will continue to build on these activities, considering the following areas in particular:

- Reviewing our governance structures for responsible sourcing of Goods for Resale and Goods Not for Resale
- Implementation of action plans to further mitigate risks and drive improvement, using inputs from the external modern slavery risk assessment, NGO reports and best practice examples;
- Review of potential KPIs and monitoring;
- Options to strengthen implementation for higher risk Suppliers of Goods Not for Resale, including service providers;
- Training and awareness of risks and reporting channels and:
- Work with the Institute of Business Ethics and other partners to ensure we are adopting best practice

6: Training

We are investing in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

7: Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking: A further risk assessment of our supply chain, new supplier standards and further training for our teams across our business. As a business that has grown significantly over recent years we recognise the constant need to redouble our efforts in this area as we enter new markets and sectors and will continue to evaluate and respond to risk.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes IVC Evidensia's slavery and human trafficking statement for the financial year commencing October 2020 and ending September 2021

This statement was approved by the Executive committee on 8th April 2021.

Signature:

A handwritten signature in black ink, appearing to be 'JL' or similar, written in a cursive style.

Independent VetCare Ltd. Registered business 07746795

IVC Acquisitions Mid Co Ltd. Registered Business 10510862

IVC PIKCo. Ltd. Registered Business 10510800

Date: 8th April 2021