



## Modern Slavery Act – Transparency Statement

### Contact

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### The Statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and shows zooplus' strong commitment to respecting human rights, including the identification and elimination of modern slavery and human trafficking in our business and supply chain. We understand the complexity and the impact of modern slavery and endorse the transparency that the Modern Slavery Act encourages.

This statement covers zooplus SE as well as all our subsidiaries in Germany and abroad (altogether hereinafter "Group"), in particular MATINA GmbH, bitiba GmbH, MATINA Services Ltd., and zooplus Services Ltd.

### Our Business

zooplus SE is a company of German law with its place of business and registered office located in Germany. The Group's scope of consolidation comprises zooplus SE, Munich, and further internal service subsidiaries across Europe. The Group does neither own nor operate any production facilities or logistics businesses.

Founded in 1999, zooplus is the leading online retailer for pet supplies in Europe. The company sells products for all major pet types through its localized web shops under the zooplus and bitiba store brands. These products include, in particular, animal feed (dry and wet food, feed supplements) as well as accessories (such as scratching posts, dog baskets or toys) in all price categories.

In addition to the large selection and the option of fast free delivery, zooplus customers benefit from wide access to interactive content and community offers. The zooplus business model has been successfully introduced in 30 European countries, making zooplus the only truly pan-European online retailer of pet supplies.

### Our Supply Chain Network

zooplus sources all key products directly from the respective manufacturers. Procurement is carried out internationally, drawing on more than 200 suppliers, who are primarily based in Europe. Additionally, zooplus sources from selected manufacturers in Asia and Canada. zooplus has an internationally organized purchasing department, as well as a wide product range with a total of approximately 8,000 food and accessory items for dogs, cats, small animals, birds, fish and horses. This wide range of brands and products includes everyday staples such as recognized brands of pet food, augmented by the company's own brands and specialty articles such as care products, litter, toys and other accessories. Branded food and related accessories are focused on dogs and cats as they represent the two largest pet populations.

The particular risk areas in our supply chain are less likely to be our immediate suppliers, but the production of intermediate meat and fish products in Southeast Asia, as well as components sourced from the paper and cardboard, textile and electronics industries.

Procured products are stored and prepared for shipment in multiple central fulfillment centers in Europe, which are operated by logistics service providers. From these fulfillment centers, goods are then shipped to our customers in cooperation with national and international parcel service providers.

In addition to procuring products and packaging materials, zooplus procures IT equipment, office supplies, office cleaning, office catering and other items for own use.

### Our Sustainability Organization

As our business is also influenced by a large number of non-financial factors, we welcome the increasing attention paid to environmental, social, and governance aspects. In order to account for this growing relevance, we have established a dedicated Sustainability department in 2021, with its department head reporting directly to the CFO. Social matters in general lie among the core responsibilities of this function, as well as the alignment with corresponding governance processes, standards and best practices.

### Our Internal Training

As the success of the business largely depends on the knowledge and performance of zooplus' employees, we pay serious attention to a continuous training program. Whilst this is particularly important for the procurement departments, we train all employees immediately after joining zooplus to raise awareness of our ethical, moral and social values and principles. We have initiated the development of a new Compliance Curriculum, that is planned to be rolled out in 2022 and contains a focus on Corporate Social Responsibility, including human rights and modern slavery.

### Our Company Code of Conduct

We require all employees to abide by our Company Code of Conduct, which serves to give all employees a clear understanding of the high social and ethical standards at zooplus. The Code of Conduct applies to zooplus SE and all companies within the zooplus Group. Its requirements hold true not only when performing duties internally but also externally, when selecting and working with business partners.

The Code of Conduct dedicates a specific section to emphasizing the relevance of human rights and of acting socially responsible: All employees are bound to ensuring human rights and fundamental social standards, as the basic principles of human coexistence, be not violated in any way within their area of authority and influence; this applies both within the company as well as in cooperation with our business partners.

Compliance with the rules set out in the Code of Conduct is indispensable. Therefore, in case of any concern or knowledge of breaches, employees should submit those to the corresponding supervisor. Furthermore, zooplus offers the opportunity to report any evidence of misconduct anonymously via a whistleblower hotline. All matters resulting from the use of the whistleblowing system are investigated and dealt with by the Compliance Team Whistleblowing. In addition, zooplus has set up an external reporting office, which is staffed by an external trusted attorney.

### Our Supplier Code of Conduct

We require all suppliers to comply with our ethical, moral and social values and principles in our Supplier Code of Conduct or to make an equivalent statement. This is part of our standard procurement process. Our Supplier Code of Conduct sets out the expectations and requirements that all our suppliers must comply with. It includes requirements that suppliers respect human rights, tackle labor violations and ensure legal compliance. It also includes specific reference to the Modern Slavery Act 2015.

The Supplier Code of Conduct requires that suppliers ensure their affiliated organizations, such as their own suppliers, factories and authorized subcontractors, uphold the same requirements. We reserve the right not to do business with suppliers that do not share and demonstrate our values and principles and our strong commitment in respecting human rights.

## Our Audits

We regularly review the execution and operational effectiveness of our Group's policies, including our Codes of Conducts, and compliance with the Modern Slavery Act.

Evaluating social standards in high-risk countries is a natural component of our due diligence and clearance process for new business partners, dependent on their country specific risk exposure. In addition to our existing evaluation methodology, we have introduced further business partner assessment measures in 2021.

With regard to our existing suppliers, we further expanded our social audit activities during 2021, following a risk-based approach. For the majority of suppliers outside of Europe

- either on-site audits were conducted by our partner, a recognized international inspection and certification company
- or CSR audit reports from internationally recognized organizations like BSCI were requested from the suppliers.

In order to further expand auditing activities into our supply chain, zooplus has staffed an additional Quality Management team with quality assurance experts. Enhancing quality assurance in social matters even further is among the focus responsibilities of this team.

As no business can tackle this challenge alone, we are willing to conduct an open and transparent dialogue with our business partners. Furthermore, we will encourage our employees to take a proactive approach in identifying risk areas.

This statement was approved by the Management Board of zooplus SE at its board meeting on 28th of June 2022 and the information in this statement is accurate as of that date. This statement covers the financial year ending on 31st of December 2021.



Dr. Mischa Ritter  
Member of the Management Board (COO)

Munich, 28.06.2022