



I. INTRODUCTION

The KONG Company LLC (“**KONG Company**”) and its subsidiaries continually work to prevent slavery and human trafficking from taking place in our manufacturing supply chains and operations. This report details the steps that the KONG Company and its subsidiaries take to reduce and eliminate forced and child labour from their supply chains.

This report fulfills the requirements of the UK’s *Modern Slavery Act 2015* (**UK MSA**). This is the first report of the KONG Company under Canada’s *Fighting Against Force Labour and Child Labour in Supply Chains Act* (“**Canadian MSA**”).

Reporting entities in the United Kingdom are KONG Company Limited (“**KCL**”), and reporting entities in Canada are KONG Company LLC. These entities are collectively referred to as “KONG” herein. The information included in the statement refers to the financial year 2023.

II. STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

a. Structure and Activities

The KONG Company is an American company headquartered in the state of Colorado that develops designs and produces lines of dog and cat toys and treats. KONG has been innovating since 1976 to enrich the lives of pets with the highest quality pet toys and treats. The KONG product line provides mental and physical stimulation through encouraging play, appropriate chewing habits, and controlled feeding to help ensure pets are at their happiest and healthiest at every life stage.

KONG Company is headquartered in Golden, Colorado. Operations span North America (USA) the United Kingdom and Australia. There are around 200 employees in the USA, 75 in the UK and Australia. No employees in Canada at this time.

The KONG Company is proud to be a founding member of the [Pet Sustainability Coalition](#).

For the UK, operations are managed by KCL. KCL is controlled and owned by the KONG Company. The two company directors are Kathy Decker Frueh and John Nelson who are based in the USA. The head office for KCL, is:

Unit 7 High Post Business Park
Salisbury
SP4 6AT

KCL is a distributor for the UK and Europe. The KONG Company supplies all products, which are imported from either the USA or China. KCL operates all year round and work UK office hours mostly Monday to Friday.



In the UK, most of our workers are based in Salisbury. Two UK sales personnel and two members of staff in Germany and one in Greece and one in Finland.

Our Canadian operations are done through the KONG Company USA. This includes importing, distributing, and selling our products within Canada.

Further information about our business is available from website online:

<https://www.kongcompany.com/>

b. Supply Chains

In order to fulfil its activities, KONG Company supplies dog and cat toys and treats. Our suppliers are globally sourced.

III. COMMITMENT

KONG acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the UK MSA and the Canadian MSA. KONG understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

KONG does not enter into business with any organization, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to KONG, in the pursuance of the provision of its own services, is obtained by means of slavery or human trafficking. KONG strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

IV. POTENTIAL EXPOSURE/ RISK

KONG considers its main exposure to the risk of slavery and human trafficking to exist in China where they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, KONG considers its exposure to slavery/human trafficking to be relatively limited. KONG has taken steps to ensure that such practices do not take place in its business nor the business of any organization that supplies goods and/or services to it.

KONG assesses manufacturing suppliers and service providers for continued compliance and improvement. Many sites are assessed multiple times a year, including follow-up assessments to address specific findings. Assessments may include, but are not limited to:



- Site inspection of all areas of the site.
- Confidential worker interviews or surveys conducted without site management present.
- Review and analysis of site documents or licenses to assess workers' age, contracts, compensation, working hours, and workplace conditions.
- Identification of past compliance issues, areas for improvement, and development of a remediation plan.
- Audit reports and findings are reviewed regularly by senior leadership and corrective action plans are implemented as needed.

V. POLICIES & DILIGENCE

KONG internally sets out guiding principles and establishes that in performing job duties KONG employees should always act lawfully, ethically, and where appropriate in the best interests of KONG.

KONG has set clear standards on the prevention of forced labour in its supply chain required of all manufacturing suppliers, and service providers supporting KONG's operations.

KONG evaluates and addresses risks of modern slavery and human trafficking in business operations which, among other standards, include that:

- Suppliers must not use forced labour – slave, prison, indentured, bonded, or otherwise.
- Suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice.
- Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees. All fees and expenses charged to workers must be disclosed to KONG and communicated to workers in their native language in advance of employment.
- Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.
- Workers must be given clear, understandable contracts regarding the terms and conditions of their engagement in a language understood by the worker.



KONG carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organization or supply chains, including conducting a review of the controls of its suppliers.

Most recently, KONG has reviewed the Uyghur Forced Labor Prevention Act (UFLPA) compliance. In doing so, suppliers certified that their products are not produced, and material is not sourced from the Xianjiang Uyghur Autonomous Region of China.

Additionally, KONG has reviewed its supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.

VI. SLAVERY COMPLIANCE OFFICER

The KONG Company and its subsidiaries have a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the KONG Company's obligations in this regard.

VII. REMEDIATION

The KONG Company has not identified any incidents of forced or child labour in their supply chains. As such, they have taken no remediation measures. KONG is committed to taking appropriate remediation measures and assisting vulnerable persons to the extent they become aware of any instances of forced or child labour.

VIII. TRAINING

Our factory partners are currently conducting training for their employees. We receive yearly third party social and ethical audit results (SMETA, BSCI, etc.) as part of our supplier diligence, policies, and practices. KONG currently is researching training options for applicable employees, including the Slavery Compliance Officer.

IX. EFFECTIVENESS

KONG's policies are reviewed annually to ensure that they meet the companies needs and stakeholder expectations. This includes our policies related to forced and child labour.



APPROVAL & ATTESTATION

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and Canada's Fighting Against Force Labour and Child Labour in Supply Chains Act and will be reviewed for each financial year.

In accordance with the requirements of the Canadian MSA and the UK MSA, I attest that I have reviewed the information contained in the report for KONG Company and KLC. I attest that the report has been approved by the board of directors of the KONG Company and that, based on my knowledge and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed.

Signature:	<i>Kathy Decker</i>
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Name: Kathy Decker Frueh

Title: President

Date: May 31, 2024

I have the authority to bind KONG Company LLC