

**FIGHTING AGAINST FORCED
LABOUR AND CHILD LABOUR
IN SUPPLY CHAINS**

2023 ANNUAL REPORT



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About this Report

This report constitutes the first report of VetStrategy Canada Holdings Inc. (“VetStrategy”), and its subsidiaries that are reporting entities under the Act, namely Groupe Vétérinaire Daubigny Inc., Dr. Michelle Cutler Veterinary Professional Corporation, 0980040 B.C. Ltd., VetStrategy Alberta Inc., VetStrategy Manitoba Veterinary Corporation and 3309125 Nova Scotia Limited (together with VetStrategy, the “VetStrategy Companies”) pursuant to Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

The report is a joint report (“Report”) prepared by VetStrategy and IVC Evidensia (“IVCE”) for the financial year ended September 30, 2023 (the “Reporting Period”). IVCE is the parent company of VetStrategy and is headquartered in Bristol, United Kingdom. This Report covers the operations of the IVC Evidensia Group (as defined below), including the VetStrategy Companies, in Canada, the United Kingdom and Europe. This Report outlines the steps taken during the Reporting Period to assess and reduce the risk of slavery and human trafficking occurring within our business and supply chain.

In preparing this Report, each of the VetStrategy Companies engaged with each other, and also consulted with key areas of the organization, including Procurement, Human Resources, Legal and Compliance. These teams operate across the IVC Evidensia Group, including the VetStrategy Companies. This consultation process has supported, and will continue to inform the enterprise-wide approach of IVCE to forced labour and child labour.

The terms “we”, “our”, “us”, and “IVC Evidensia Group” as used in this Report refer collectively to IVCE and the VetStrategy Companies, including its subsidiaries, other entities, joint ventures and other arrangements with veterinarian partners which operate VetStrategy’s network of veterinary clinics and animal hospitals across Canada, unless the context suggests otherwise*. These terms are used for convenience only and are not intended as a precise description of any separate legal entity among the VetStrategy Companies, or that is otherwise part of the IVC Evidensia Group.

*In the United Kingdom, the IVC Evidensia Group includes the companies listed in Appendix 1 to this Report.



About IVC Evidensia & VetStrategy

Founded in 2011, IVC Evidensia Group has grown to become an expansive network of almost 2,500 veterinary clinics, hospitals and out-of-hours centres, with a presence across 20 countries within the UK, Europe and Canada. We are currently the second-largest veterinary group in the world, and the largest in the UK and Europe.

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.

VetStrategy, incorporated in the Province of British Columbia and headquartered in Woodbridge, Ontario, was founded in 2006. VetStrategy joined the IVC Evidensia Group in 2021. VetStrategy is now the leading veterinary network in Canada, with veterinary practices, 24-hour emergency care, and specialty hospitals coast-to-coast. VetStrategy has developed and refined a model for supporting our practices across the country.

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.

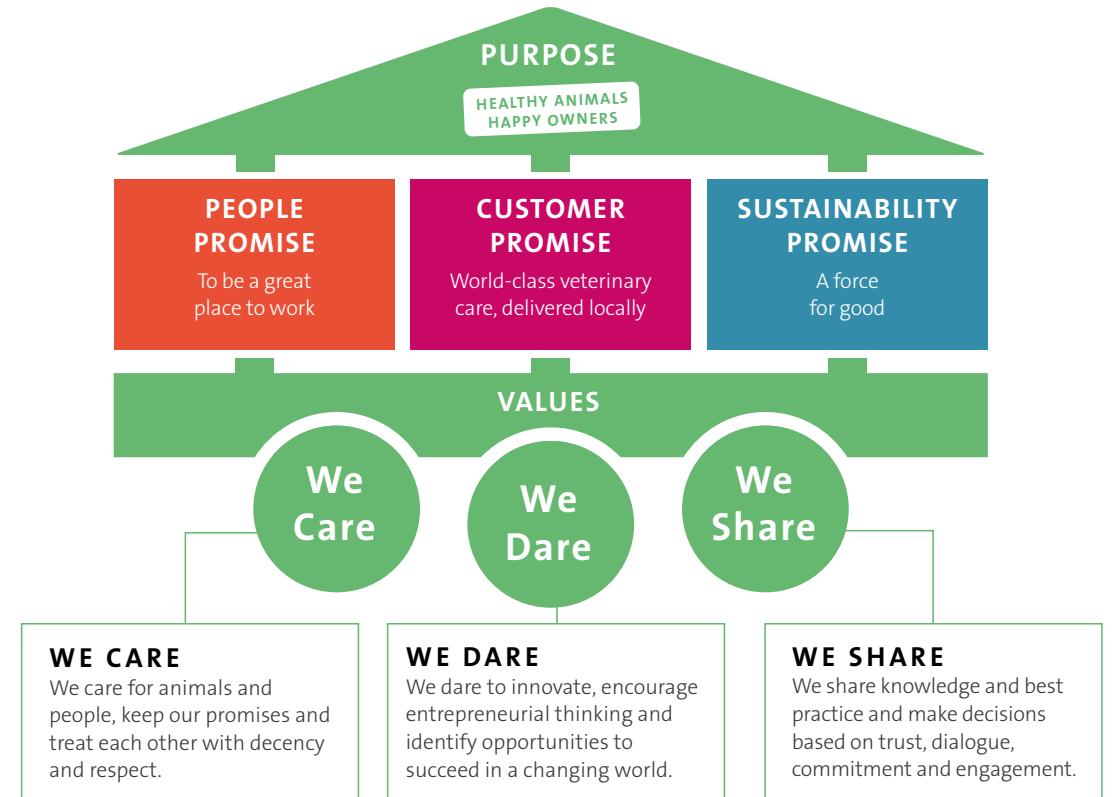
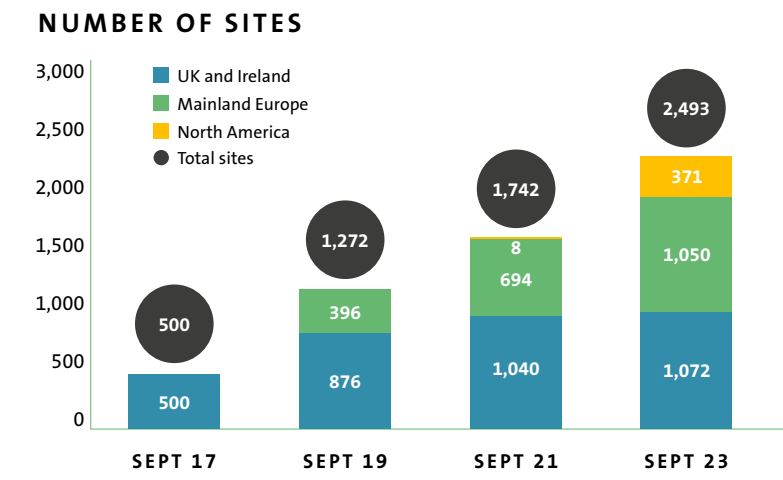
Our size and global scale enables us to invest for the benefit of our people, the animals they care for, our customers and the planet. Our scale also enables us to invest significantly into our systems, facilities and people.

In addition to our veterinary clinics and hospitals, the IVC Evidensia Group provides other services including pet cremation and other aftercare services, clinical waste disposal, pet pharmaceuticals, and direct debit services.

We provide veterinary care for over 9.7 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 specialist equine vets care for horses.

The IVC Evidensia Group is a team of 42,000 people working part and full-time across veterinary clinics and hospitals, crematoriums, warehouses and support offices throughout the UK, mainland Europe, the United States and Canada. Our veterinarians and veterinary technicians are registered with the relevant regulatory body in the country, province or other territory in which they are practicing. The majority of our team members are employed on full-time, permanent contracts.

VISION
Our vision is to be the best veterinary group in the world.



41,000
Total Employees

16,300
Support

11,000
Vets

2,518
Clinics / Hospitals

14,700
Veterinary Nurses

157
Crematoriums

To find out more about the nature of the IVC Evidensia Group's business, see www.ivcevidensia.com
For additional information about VetStrategy's Canadian operations, see <https://www.vetstrategy.com/>

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, key performance indicators 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 Sustainability & ESG Director and by our Positive Pawprint Steering Committee, with representatives from across our key business functions and countries. IVC

Evidensia Group's Chief Executive Officer has accountability for sustainability issues at Executive board level. We have developed policies for the key aspects of our sustainability program, available at [Sustainability | IVC Evidensia](#). 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 the IVC Evidensia Group. A detailed report on our sustainability performance and approach is published in [IVC Evidensia's 2023 Sustainability Report](#).

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	Practise leading standards of chemical and pharma management	Collaborate with peers to innovate best practice on antimicrobial resistance
Governance Management, Transparency and Disclosure		

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.

The IVC Evidensia Group spends over £1.3 billion a year through our global supply chain. Over 70% of our contracted spend is with around 200 supply chain partners. The largest product category we buy is pharmaceuticals, making up over 50% of our spend. The suppliers of these products tend to be large international corporations based in the UK, Europe and North America. In the UK and Europe, we have a small portfolio of own-brand veterinary pharmaceutical and nutraceutical products.

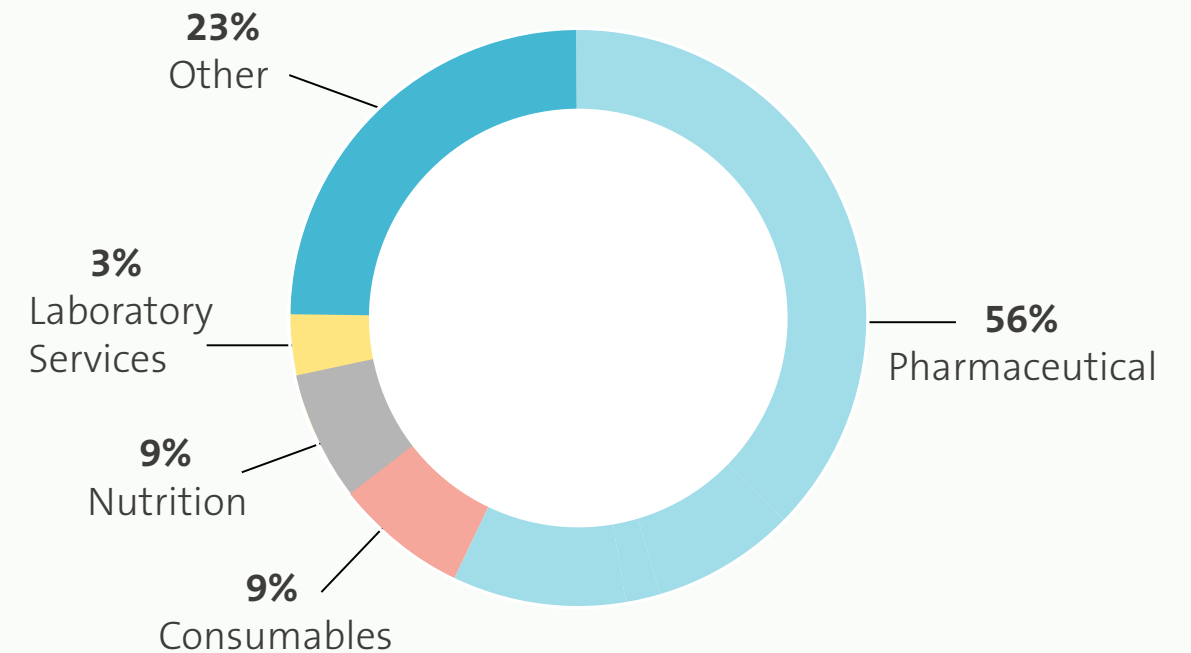
The IVC Evidensia Group has centrally negotiated procurement contracts across the main procurement categories. In our largest markets, we partner with wholesalers for the supply

of veterinary pharmaceuticals and other consumables to our clinics. In those markets where there are wholesaler arrangements in place, the IVC Evidensia 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 centrally with arrangements for distribution agreed and implemented regionally or at the 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

IVC Evidensia supply chain by category



Strategy & Governance

Strategy

The IVC Evidensia Group 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.

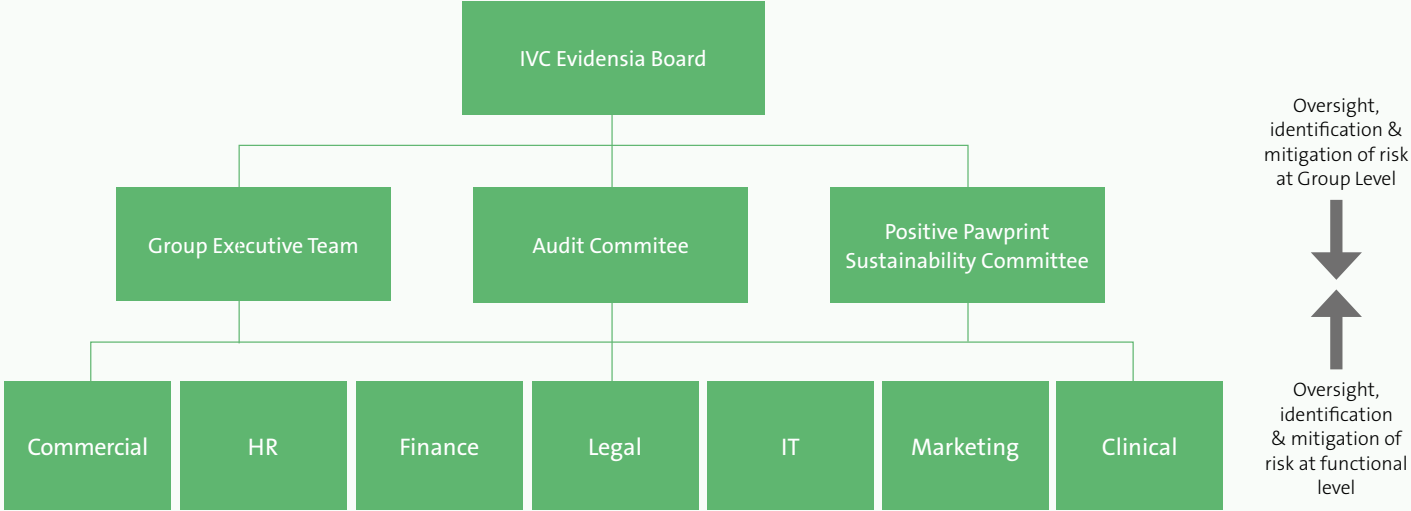
- Our actions to mitigate against the risk of modern slavery are structured around five key areas:**
- Developing and implementing robust policies and governance procedures;
 - Identifying and assessing risks of modern slavery in our operations and supply chains;
 - Due diligence within our business operations and supply chain; and
 - Developing and monitoring key performance indicators.

Our Report 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 IVC Evidensia 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 ESG Director and Legal team. The Group Executive Team is responsible for the day-to-day compliance and oversight of operations. The Audit & Risk Committee provides independent oversight and challenge. A number of departments and functions are responsible for devising policies and processes which will support the IVC Evidensia Group’s human rights responsibilities, including HR, Legal and Commercial.



Policies & Principles

The IVC Evidensia Group 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

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 launched globally in March 2022 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.

The Code of Ethics is primarily aimed at employees but is also provided as part of the Supplier Assessment where our suppliers are expected to sign up to our Code or demonstrate that they have a comparable Code and standards.

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 in the IVC Evidensia Group.

Our employees are required to stay alert for any behaviour that might suggest modern slavery and red flags can be found in the Risk Assessment section of this Report. We pledge to engage third parties on fair terms and in accordance with the IVC Evidensia Group's policies and procedures and expect our suppliers to do the same.

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. These apply to all of our suppliers and their supply chains.

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 is an integral part of the tender process.

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

Supplier Assessment

We operate a Supplier Assessment Process to complement our Code of Conduct and this forms part of our supplier selection process with all suppliers expected to demonstrate their compliance with the Modern Slavery Act 2015 or corresponding local laws and outline their approach to tackling this issue. The areas which they are requested to outline include risk assessment, supplier due diligence, training awareness and recruitment processes.

Now that this Supplier Assessment Process is in place we are more aware of the actions our suppliers are taking and can make more informed decisions when selecting preferred suppliers.

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 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

The Speak-Up (Whistleblowing) Policy was rolled out globally in November 2021 to support the implementation of the European Whistleblowing Directive. The policy reinforces our commitment to zero tolerance of any retaliation. Summary reports from Speak-Up reports are provided to our Group Head of Compliance and subsequently reported to the Group General Counsel and the Audit Committee.

In addition, our VetStrategy business in Canada offers a confidential and anonymous reporting service for employees to report serious complaints in violation of policy, the law or regulations. This service is administered and staffed by a third-party service provider, Lighthouse Services.

Human Rights Policy

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

The Grievance Policy provides employees with the key information they need to know if you 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

IVC's Anti-Bribery, Corruption & Fraud Policy provides information and guidance to those working for, or with, the Group on how to recognise and deal with issues and provides a framework response plan for investigating and reporting instances.

Breaches and Non-compliance

The IVC Evidensia Group 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 Dilligence

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 2023 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 large proportion of our employees are highly skilled and independently registered by professional bodies means that the risk of modern slavery or human trafficking is low. Our risk assessment indicates that the greatest area of risk is associated with temporary staff, for example those employed within our crematorium operations or in the provision of distribution services, and also with the local contractors providing services, such as gardening and window cleaning, to our clinics.

In the year ahead, we will focus on improving our understanding of the risk in this area and strengthening our controls and the level of training and guidance provided to our local clinic teams and also to the local contractors themselves.

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 continues to be establishing key policies, training and setting the standards for supplier relationships focused around our Code of Conduct.

The consolidation of our supply chain is a strategic priority for the IVC Evidensia Group. As we continue to make progress with this work, this will give our Procurement teams 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 2025, suppliers representing at least 95% of spend will have committed to our Code of Conduct.

Our electronic Supplier Assessment Process is used across the IVC Evidensia Group for all new suppliers going through the 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 provide is a true and accurate reflection of their operational approach to complying with the Modern Slavery Act 2015 or

corresponding local laws.

We are using our risk assessment findings to ensure our Supplier Assessment Process focuses on suppliers operating in the high-risk locations and sectors. We have identified 65% our contracted spend with modern slavery acknowledged risk sectors including pharmaceuticals and medical supplies and have focused our due diligence assessments on this supplier group.

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.

During the year, we have introduced an Enhanced Supplier Evaluation for those suppliers 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.

The outcomes of the supplier assessment are reviewed by our Procurement team and subject to further investigation as appropriate with any corrective actions and a timeline for resolution agreed with the supplier. No issues or non-conformance related to modern slavery or child labour were identified. As such, we did not assess a need to consider or implement measures to remediate any forced labour or child labour, or loss of income to vulnerable families arising from initiatives intended to eliminate the use of forced labour or child labour in our business activities and supply chains.

Our evaluations did, however, identify certain areas for improvement, primarily related to training and record keeping. In this regard, corrective actions were agreed with the supplier to ensure processes were improved within an agreed time period.

The Group Audit and Risk Committee reviews the supplier due diligence process and outcomes on an annual basis.

During 2024, we plan to further strengthen our supplier due diligence process with the introduction of 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 to help us to target our supplier engagement. We also aim to better understand the impact forced and child labour remediation measures, if/where needed, can have on vulnerable families, and expect to explore, together with our supplier partners, strategies for assessing and mitigating the effects of those measures.



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. IVC Evidensia Group's Learning Management System is our digital educational platform. This has now been rolled out across all the regions where we operate and is accessible to over 95% of our 41,000 employees globally. Training is provided in multiple languages covering clinical topics, client communication and well-being support for colleagues in all markets. We use this tool to educate our employees in recognising the risks of modern slavery and human trafficking within our business and supply chains.

Modern slavery training forms part of our annual training program and 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 Group'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

In the year ahead, we plan to supplement this core training with in-depth guidance for personnel in higher risk roles where they have direct involvement in our recruitment processes or with suppliers. This includes country HR Managers, our Procurement teams and also local procurement leads. Issues covered will include a reminder of the warning signs of modern slavery, existing controls in place.

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 IVC Evidensia Group Audit and Risk Committee which is a sub-committee of our Board.

We monitor and evaluate the following KPI metrics:

KPI	FY22/23 performance
% centrally-contracted suppliers signed up to IVC Evidensia Group's Code of Conduct or provided own equivalent	89%
% IVC Evidensia Group Executive Committee members trained on modern slavery awareness	100%
% IVC Evidensia Group employees trained on modern slavery awareness	Over 76%
% senior management, HR & Procurement personnel trained on modern slavery awareness	100%
Modern slavery issues reported via whistleblowing line	None
Modern slavery issues identified through supplier due diligence process	None



Focus for 2023/24



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 modern slavery remediation policy to employees in higher risk roles (i.e. where they have direct involvement in our recruitment processes or with suppliers).
	Communicate whistleblowing facility to suppliers and contractors.
Risk Assessment & Due Diligence	Implement a dedicated ESG risk assessment and due diligence system to provide more in-depth information on modern slavery and ESG risk across a wider number of suppliers.
	Ensure recruitment agencies (including locum recruitment) understand IVC Evidensia Group's expectations regarding modern slavery risk management and controls.
	Review controls in place to manage modern slavery risk associated with local contractors providing services, such as gardening and window cleaning, to our clinics and update controls, training, and guidance as appropriate.
Training & Awareness	Develop in-depth modern slavery guidance for employees in higher risk roles (i.e. where they have direct involvement in our recruitment processes or with suppliers).
	Develop training resources for SMEs providing services to our clinics to support these SMEs in the development of their own policies and procedures for managing modern slavery risk.

Approval and attestation

This Report is submitted for and on behalf of the VetStrategy Companies and has been approved by the Group Board of Directors of IVC Evidensia Group and VetStrategy's Board of Directors in accordance with sub-section 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, we, the undersigned, attest that we have reviewed the information contained in this Report. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in this joint report is true, accurate and complete in all material respects, for the purposes of the Act, for the Reporting Period specified above.

I make the above attestation in my capacity as a director of the board of directors of IVC Evidensia Group (the "IVCE Board") for and on behalf of the IVCE Board.



Simon Smith
IVC Evidensia Group Chief Executive Officer

May 30, 2024

I make the above attestation in my capacity as a director of the board of directors of VetStrategy Canada Holdings Inc. (the "VetStrategy Board") for and on behalf of the VetStrategy Board.



David Murphy
VetStrategy Chief Executive Officer

May 30, 2024

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 (i) business gives rise to global turnover of more than £36 million:

- Independent Vetcare Limited
- Vets Now Emergency Limited (indirect subsidiary of Independent Vetcare Limited)

