

Modern Slavery Act Statement

Protecting Human Rights





Modern Slavery Act Statement

Protecting Human Rights

Table of Contents

1. Our Company
2. Introduction
3. Risk & Business Analysis
 - 3.1 Oversight & Accountability
 - 3.2 Embedding Risk Governance
 - 3.3 Identify & Access Adverse Impacts
 - 3.4 Cease, Prevent, Mitigate & Act on Adverse Impacts
 - 3.5 Track, Implement & Monitor Results
 - 3.6 Communicate How Impacts Are Addressed

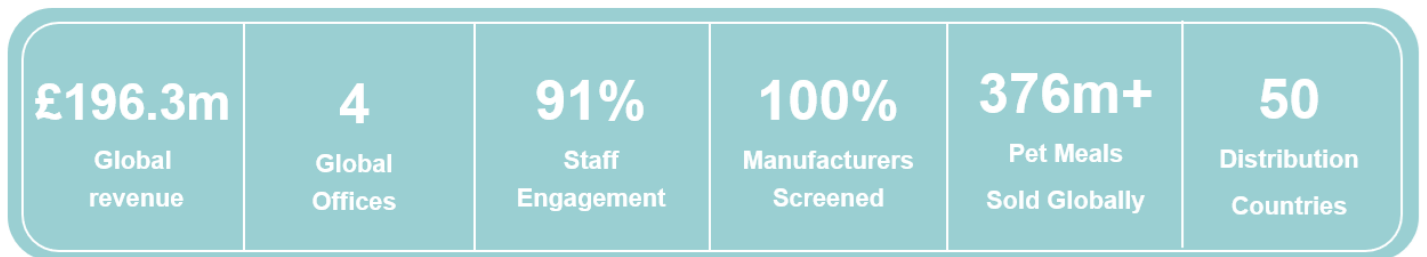
1 Our Company

MPM Products Limited of 2nd Floor Trident 3, Styal Road, Manchester, MX22 5XB, England with registered number 04610825 and members of our group (“MPM”, “we”, “us”, “our”) is a rapidly expanding global leader in the natural pet food sector.

We provide high-quality, responsibly sourced¹ products that enhance the health and well-being of pets worldwide. Our growth is anchored in a deep commitment to environmental stewardship, ethical sourcing, and social responsibility.

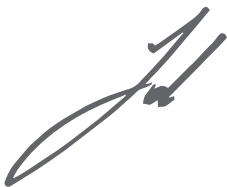
We operate in five major market segments. In 2023, successful marketing and distribution of our Petfood brands accounted for £196.3m in revenue, up 20.4% on 2022.

We are a proud living wage employer, employing 150+ employees worldwide with business operations in the UK, USA, Australia & China. To operate our business successfully, we work with a diverse range of suppliers including but not limited to manufacturing, packaging and third party logistics sites.



**Data as of 31st Dec FY2023*

We prioritise simplicity and efficiency in our operations, while ensuring that all individuals involved in our supply chain receive fair treatment, safe working conditions, and respect for fundamental human rights. This Human Rights and Environmental Due Diligence Policy reflects our unwavering commitment to these values as we continue to grow responsibly on a global scale



Julian Bambridge
Chief Executive Officer



MPM Products Limited
30th September 2024

2 Introduction

This statement, approved by the MPM Products Limited Board of Directors during September 2024 board meeting, has been published in accordance with the Modern Slavery Act 2015 section 54(1) and UN Guiding Principles on Business and Human Rights. It sets out the steps taken by MPM and its subsidiaries to prevent modern slavery and human trafficking in its business and supply chain during MPM's financial year ending 31 December 2023. The process of preparing this statement involved the participation of a wide range of internal stakeholders across many functions of MPM.

This statement was developed in alignment with the following internationally recognised standards:

- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises (OECD Guidelines)
- Fundamental Conventions of the International Labour Organization (ILO)
- Modern Slavery Act 2015

3 Risk & Business Analysis

With the adoption of our Modern Slavery Statement, we affirm our commitment to the values of transparency, responsibility, simplicity, and continuous improvement across our global operations.

At MPM, we conduct rigorous due diligence, prevention, and remediation efforts within our owned facilities, among high-risk and high-priority suppliers, and throughout our critical ingredient and material supply chains.

To effectively monitor and mitigate risks, we have implemented Human Rights Due Diligence (HRDD) programs tailored to our specific value chain. These programs utilise advanced tools designed to identify, assess, and address any negative impacts arising from our operations. Our focus includes uncovering any human rights violations, environmental harm, or non-compliance with applicable laws and regulations.

We are dedicated to collaborating with our stakeholders and suppliers to address and resolve any identified issues. When necessary, we take corrective actions to ensure positive outcomes.

Our Human Rights Due Diligence Guide (HRDD)



3.1 Oversight & Accountability

MPM’s E.S.G and Procurement Strategies play a central role in embedding responsible business conduct throughout our group of companies. Our due diligence governance evidences our commitment to respecting human rights and the environment and reflects our expectations towards our business

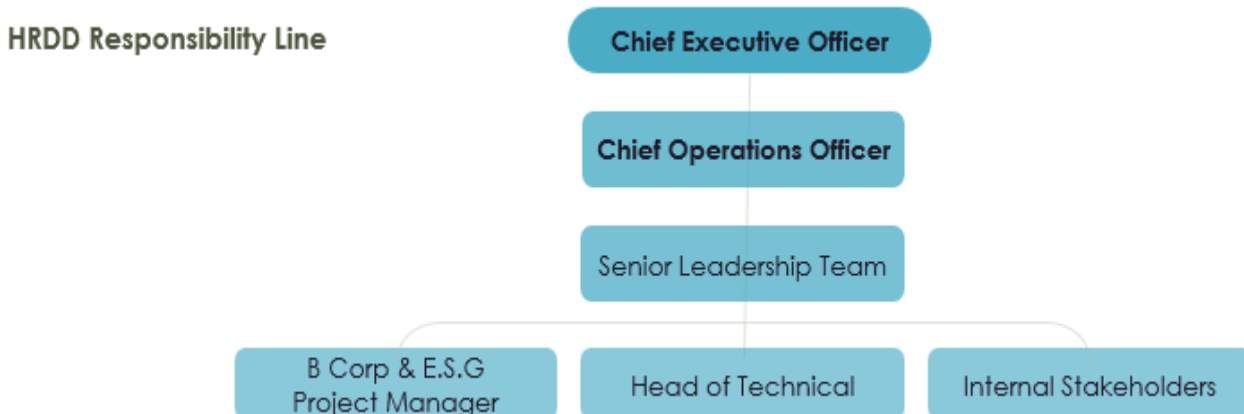
Policies

The HRDD policy builds upon the sustainability related policies below. See our website for further information.

POLICY	E.S.G PILLAR	POLICY	E.S.G PILLAR
Code of Conduct	People Excellence	Quality Management System	Product Excellence
Anti-Bribery & Corruption Policy	People Excellence	Supplier & E.S.G Assessments	Product Excellence
Health & Safety Policy	People Excellence	Critical Escalation Policy	Product Excellence
Diversity & Inclusion Policy	People Excellence	Procurement Strategy	Product Excellence
Health & Wellness Policy	People Excellence	Sustainable Sourcing Policy	Product Excellence

3.2 Embedding Risk Governance

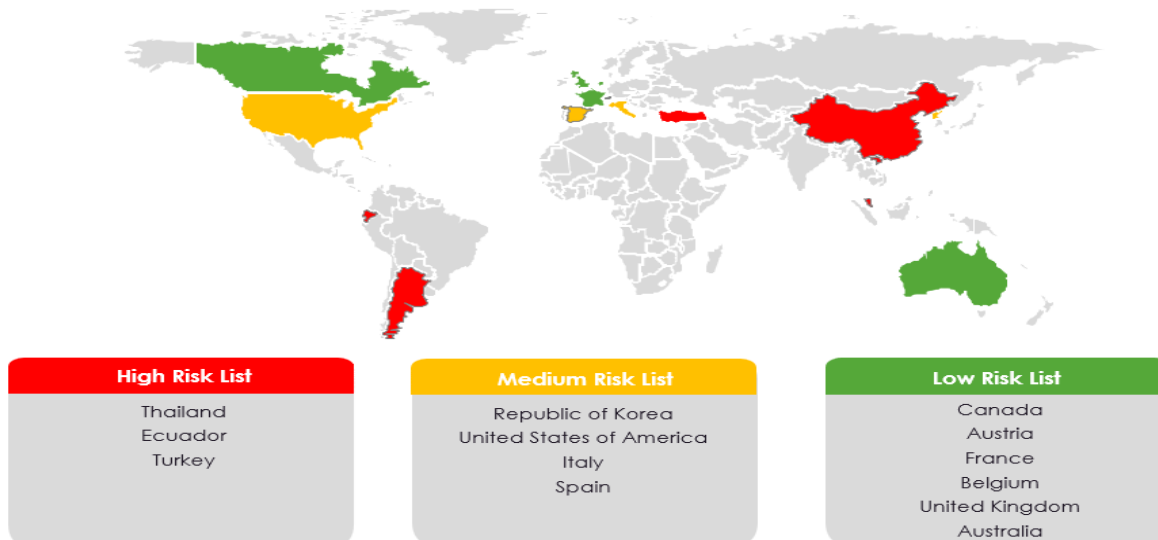
The CEO is responsible to the Board for the ethical operation of our business, including respecting human rights, supported by the Chief Finance Office, Chief Operations Officer (ESG, Corporate Responsibility and Procurement) and senior leaders of daily business area, the Director of People and colleagues throughout our company.



3.3 Identify & Assess Adverse Impacts

We recognise our responsibility to identify, assess and prioritize risks and violations in our supply chain. The risk assessment aids our due diligence activities by helping us identify the most important and urgent issues that we need to address.

MPM Procurement Map 2024



Supply chain transparency

Identifying social and environmental risks in the supply chain begins with transparency. Global supply chains from raw materials to finished products are highly complex, involving many different actors such as producers, farmers, wholesalers, manufacturers and importers. Currently we have visibility of the final product manufacturer (tier 1 suppliers). As part of our commitment, we are evaluating our tier 2 suppliers to improve our raw material transparency.

Annual risk assessment

In 2024 we partnered with business and human rights experts, to conduct a due diligence gap analysis which involved a review of MPM's policies, processes and practices. This assessment enabled us to gain a clear picture of our maturity on the management of human rights risks and potential improvements.

As part of this assessment, we evaluated 13 countries where we currently have active third-party manufacturing suppliers, in relation to potential human rights and environmental risks. We considered the likelihood and severity of potential impacts by reviewing quantitative risk scores of independent sources including the UN and World Bank.

Our quantitative risk data indicators:

- Climate vulnerability
- Biodiversity loss
- Occupational health & safety
- Forced labor
- Child labor
- Migrant workers / Women / Temporary Workers

MPM will conduct an annual risk assessment which will give us the necessary insights to help further prioritise our most significant risks. In addition, where necessary, we will conduct a specific risk assessment in the event we identify any reasons which justify this course of action. potential new negative impacts.

3.4 Cease, Prevent, Mitigate & Act on Adverse Impacts

MPM performs due diligence, prevention and remediation on all our owned facilities, high-risk and high-priority suppliers, and within priority ingredient and material supply chains.

To monitor and remediate risk, over the course of 2024/25 we will implement HRDD programs.

All employees have an obligation to conduct business with integrity including respecting human rights.

Supplier Screening

All manufacturers and contract packagers in high-risk countries are required to have a valid social audit that complies with our accepted standards.

During the social audit, an MPM auditor will inspect and rate the supplier on the protection of labour rights. The audit takes place during the bi-annual visits or if a risk is flagged through our grievance mechanisms.

Suppliers must comply with our Code of Conduct and are assessed against Supplier on-boarding SAQ and ESG assessments.

Training

We train all staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. This includes employee training via our internal Learning Management System and or via external experts in this area. Employees must identify and report to management any potential breaches of this Statement.

MPM employees have benefited in numerous ways from the B Corp commitments. For all MPM offices (in the UK, USA, China & Australia) we have, or will shortly be implementing, 'staff culture books' detailing MPM's policies and procedures, as well as rights and benefits of employees. HR processes and policies are set out with regards to internal MPM guidelines and meet current legislation within each country.

Spot check program

To complement the social audits, during one of our bi-annual supplier visits MPM will perform spot checks at manufacturing suppliers each year. The aim of the spot checks is to verify the social audit results and identify potential new Human Rights risks that require mitigation and follow up with a corrective action plan.

Spot checks will cover the following topics:

- Climate vulnerability
- Biodiversity loss
- Occupational health & safety
- Forced labor
- Child labor
- Migrant workers / Women / Temporary Workers

3.5 Track, Implementation & Monitor Results

Our ethical sourcing policy outlines the minimum standards that we require our suppliers to comply with in human rights, labour rights and environmental impact. We monitor compliance with this policy through our site visits (spot checks), social auditing, supplier assessments and our horizon scanning alerts. By evaluating learnings and continuously building on our due diligence activities we aim to continually improve our performance.

Managing & Mitigating Risks

During 2024/25 MPM will prioritise monitoring our high-risk suppliers, ensuring that they have up-to-date third-party social audits under recognised accreditation frameworks such as SMETA & SA800.

Going forward from 2025/26 we will require all new manufacturing and co-packing suppliers to undergo third-party social audits. Simultaneously, we will expand our monitoring program to include existing medium- and low-risk suppliers, aiming for full coverage of our supply base by 2028.

Critical cases

When a critical case is identified through our site visits (spot checks), social auditing, supplier assessments and our horizon scanning alerts or other identification methods we will follow our procedure outline in our business continuity plan.

3.6 Communicate How Impacts Are Addressed

To communicate our commitment to HRDD we have the following in place:

Communication	Update Period	Content
Modern Slavery Statement – Protecting Human Rights	Annually on our website	The update addresses new human rights and environmental issues and our efforts to integrate due diligence into our business. We will share these updates internally and externally to ensure our commitments are understood.
Annual Impact Report	Annually on our website	Our Annual Impact Report will cover our operational impact, due diligence approach, KPIs, targets, and actions taken to address and prevent risks.
Stakeholder engagement	Ongoing and continuous	We value stakeholder feedback in our HRDD process, consulting and considering their insights to enhance our understanding and address concerns.
Code Of Conduct	18-24ths	Our Supplier Code of Conduct will be reviewed at least every 18 months or whenever there is a relevant legal change affecting the sector or the regions in which we operate.
Internal & External grievance mechanism	Ongoing and continuous	As we strengthen our HRDD program, we will continue to enhance our grievance mechanism, working closely with responsible suppliers to monitor and mitigate risks.

Provide access to remedy

While we take various measures to identify and address risks related to human rights, labour rights and the environment, we acknowledge that violations can still occur. It is important to us that our own employees, external stakeholders and individuals within our operations and supply chains have access to safe ways to report any potential misconduct.

Internal & External grievance mechanism

MPM has its own whistleblowing system in place, referenced in our staff handbook, giving our people the ability to raise any concerns of human rights violations and modern slavery related to our business or that of our suppliers.

MPM works with suppliers to build effective and transparent supply chains. We expect suppliers at a minimum to have a grievance mechanism in place. We will continue to work with our supplier base to introduce an MPM anonymous grievance mechanism by 2028.