



Modern Slavery Act – Transparency Statement

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Modern Slavery Act – Transparency Statement

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. zooplus is an e-commerce retailer and neither owns nor operates any production facilities or logistics businesses.

Founded in 1999, zooplus is committed to the vision of offering pet lovers and pet owners the best possible service as a trustworthy and convenient online shopping platform for pet food and pet supplies. 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 a large product assortment and the option of fast free delivery, zooplus customers benefit from access to a wide range of interactive content and community offers. The zooplus business model has been successfully introduced in 30 European countries, making its product offer available in 24 different languages.

Our Supply Chain Network

zooplus sources all key products directly from the respective manufacturers. Procurement is carried out internationally, drawing on more than 270 suppliers, which are primarily based in Europe. Additionally, zooplus sources from selected partners in Asia and North America. zooplus has an internationally organized Purchasing department, as well as a wide product assortment with a total of approximately 18,000 food and accessory items for dogs, cats, small animals, birds, fish and horses. This broad range of products includes everyday staples from well-known pet food brands, as well as from the company's own brands and specialty items, such as care products, toys and other accessories.

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

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

Particular risk areas related to modern slavery in zooplus' value chain are assessed to affect:

- Workers in the upstream value chain, including individuals involved in the extraction and processing of raw materials and the manufacturing of products sourced by zooplus in higher risk geographies, such as Southeast Asia

- Workers in the downstream value chain, including individuals involved in warehouse and transport logistics.

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, with its department head reporting directly to the CFO. Social matters and the alignment with corresponding governance processes, standards and best practices are dealt with in this department, in collaboration with the departments Human Resources, Compliance, and Quality Management.

Our Internal Training

As the success of our business largely depends on the knowledge and performance of zooplus' employees, we pay serious attention to an encompassing training program. Whilst this is particularly important for procuring departments, we train all employees immediately after joining zooplus to raise awareness for our ethical, moral and social values and principles. Furthermore, our mandatory compliance curriculum, including information on Corporate Social Responsibility, is continuously reviewed for updates and improvements.

Our Policies

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. It is based on the principles of the United Nations Global Compact, the International Labor Standards drawn up by the ILO, the United Nations Universal Declaration of Human Rights and the UN Convention against Corruption, and explicitly affirms our respect for human rights across all operations.

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.

All employees are bound to ensuring that 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 and 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 or report them through our whistleblowing system (see below).

Supplier Code of Conduct

zooplus is committed to respecting the human rights and labour rights of workers across its value chain. These commitments are outlined in the Supplier Code of Conduct, requiring adherence to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. The Supplier Code of Conduct specifies our expectations towards suppliers, contractors, and third-party partners, particularly in relation to the prohibition of forced labour, human trafficking, and child labour. It also includes specific reference to the Modern Slavery Act 2015.

The Supplier Code of Conduct serves as a binding framework for ethical and legal compliance for all suppliers and is supported by risk-based monitoring and due diligence mechanisms to verify adherence.

In particular, zooplus expects the following from its suppliers and their affiliated organisations, such as their own suppliers, factories and authorized subcontractors:

- Prohibition and elimination of forced labour, compulsory labour, child labour, and human trafficking
- Non-discrimination in employment, ensuring workers are treated with dignity and respect
- Compliance with the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the UK Modern Slavery Act 2015, including fair wages, limits on working hours, and safe working conditions

Through a combination of policy frameworks and operational mechanisms, we integrate social and environmental criteria into our supplier selection process. These criteria serve to ensure that suppliers adhere to our ethical and sustainability standards, which are grounded in international principles such as the UN Global Compact, the International Labour Organisation (ILO) standards, and the UN Universal Declaration of Human Rights.

We reserve the right to refrain from doing business with suppliers that do not share and demonstrate our values and principles and our strong commitment to respecting human rights.

In addition to our retail product suppliers, also our warehousing partners abide by the moral and social values and principles in our Supplier Code of Conduct.

Human rights policy commitments

To further support our commitments as set out in our Codes of Conduct, we have the following policies in place regarding human rights:

- **Whistleblowing Policy:** The whistleblowing policy encourages employees to report unethical behaviour, discrimination, or human rights violations within the workplace, without fear of retaliation. It outlines clear procedures for reporting and serves to ensure that all employees are aware of their rights and responsibilities regarding respectful behaviour at work.
- **Whistleblowing System:** zooplus offers the opportunity to report any evidence of misconduct anonymously via a whistleblowing system. All matters resulting from the use of the whistleblowing system are investigated and dealt with by the Compliance Team Whistleblowing, a cross-functional team of employees from the departments Legal and Human Resources. In addition, zooplus has set up an external reporting office, which is staffed by an external trusted attorney.
- **External Staff Policy:** The External Staff Policy establishes standards for the fair treatment of external staff and contractors in accordance with the same ethical guidelines that apply to our direct employees.

These measures collectively guide our approach to human rights within the workforce, including mechanisms for the anonymous reporting of violations. All complaints are treated confidentially and without retaliation. In addition, we provide employees with a platform for engagement and feedback, which allows us to monitor and respond to concerns regarding workplace practices.

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 and existing business partners. Supply chain due diligence measures implemented so far have been based on risk assessments, with actions taken by the individual departments depending on the level of risk exposure. With certain suppliers, we identify an increased risk of child labour and forced labour due to their supplier category and country of operation – particularly those based outside Europe.

In 2024, we have continuously undertaken social and quality audit activities with new and existing business partners. While we generally follow a risk-based approach in audit activities, we place

specific emphasis on food suppliers of zooplus' private label products, which means that irrespective of their assessed risk level, all of these suppliers are subject to mandatory audit requirements.

Our audit activities include the regular provision and update of social audit reports and certificates from suppliers, following the standards of internationally recognized organizations such as amfori Business Social Compliance Initiative, BSCI, or Sedex Members Ethical Trade Audit (SMETA).

Over the past, zooplus has steadily built up a team of quality management experts, that is dedicated to the continuous improvement of our quality assurance, including social matters.

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

This statement was approved by the Management Board of zooplus SE on 3rd of June 2025 and the information in this statement is accurate as of that date. This statement covers the financial year ending on 31st of December 2024.



Steffen Schüller
Chief Financial Officer
Management Board

Munich, 3rd June 2025