

Responsible Sourcing Handbook

Working in partnership with our suppliers to build the world's most responsible pet care supply chain

pets at home
Group plc



An introduction from our Chief Executive Officer

Our ambition is to be the best pet care business in the world, and to achieve this, we must also be the most responsible. This means working to ensure that human rights are protected and promoted throughout our supply chain and taking action to reduce our impact on the planet for today and tomorrow. This is not only the right thing to do but it also makes good business sense. Supply chains are complicated and the challenges we face are complex, so we can't do this on our own. To achieve our goals, we must work in partnership with trusted suppliers who share our values and are committed to continuous improvement.

This handbook brings all our responsible and sustainable sourcing policies together with detailed guidance and expectations. We've also provided insight into how these values and principles are embedded in our organisation and made commitments about how we will conduct our business; doing the right thing for pets, people and the planet.



Lyssa McGowan
Group Chief Executive Officer




About Us

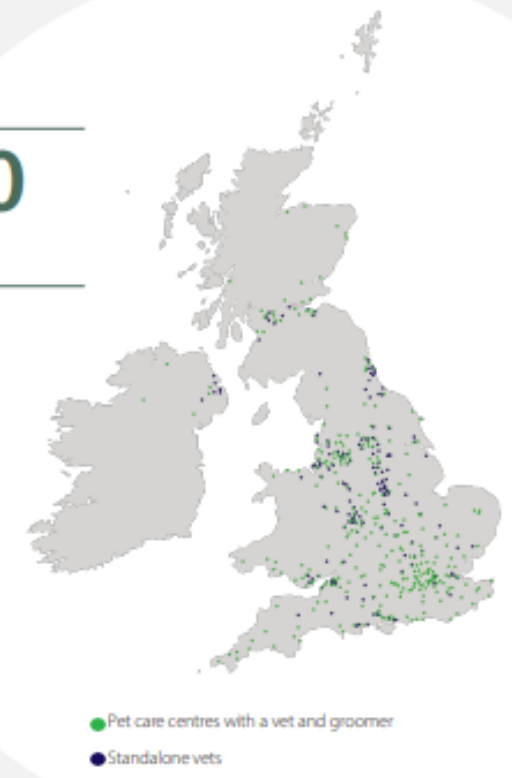
Pets at Home Group plc is the UK’s leading pet care business; our commitment is to make sure pets and their owners get the very best advice, products and care. Our pet care centres, Groom Room salons and First Opinion vet practices are located throughout the United Kingdom allowing us to offer convenient pet care to customers across the country. Pet food and pet accessory products are available online or from our 457 pet care centres, many of which have a vet practice and a grooming salon. Pets at Home operates the largest branded network of First Opinion veterinary practices in the UK, with a total of 443 practices operating under the Vets4Pets and Companion Care brand names. Our preferred model has always been to build value through shared ownership. We operate a total of 388 Joint Venture First Opinion practices which are all established as individual small businesses. The remaining 55 First Opinion practices are operated under a company managed model. Just over 16,500 colleagues are employed either directly or indirectly (via the First Opinion Joint Venture Companies). We operate the distribution centres in house and have a fleet of leased HGVs and vans. Our growing home delivery network is supported by carrier partners from our distribution centre in Northampton.

457  **1.7m**
 Pet care centres with a vet and groomer Active vet clients

337  **>10,000**
 Groom Rooms Products in our extended online range

443  **Vets**
 Veterinary practices (388 joint venture First Opinion practices and 55 company managed First Opinion practices)

Our own label brands:



Over **16,500** colleagues across our Group

3 Own Operations Distribution Centres, 2 located in Stoke-on-Trent and 1 in Northampton

2 UK Support Offices in Handforth and Swindon

1 Regional Sourcing Office in Hong Kong

Our Social Value Strategy

Our vision is to become the most responsible pet care business in the world.



Our Better World Pledge

 Pets By 2030 positively impact the life of every pet in the UK	 People By 2030 enhance the lives of one million people through our shared love of pets	 Planet By 2040 become net zero
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You can find more information about our Better World Pledge in our [Social Value Report](#).

Our approach to protecting human rights is outlined in our [Human Rights Policy](#) including our commitment to respect internationally recognised human rights in line with the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the International Labour Organization Conventions, the UN Guiding Principles on Business and the Human Rights and the Children's Rights and Business Principles.

We have a clear supplier strategy which supports our commitment to responsible sourcing

1.

We carefully select business partners who share our values and commitment to uphold and continuously improve labour and environmental standards.

2.

We seek to build long term stable supplier relationships and use our buying power to influence improvements in workplace and supply chain standards.

3.

We set clear expectations for supplier standards and provide guidance and support to help our suppliers to achieve these standards.



Our Sustainable Product Framework

To support our Better World Pledge and to help guide our decisions on product development and sourcing, we've developed a product framework

Products Sourced Responsibly

Products designed and manufactured in a responsible way

Product Development



We make decisions about our products and ranges to ensure that pets' welfare and safety comes first

Responsible Manufacturing



We work with companies that demonstrate a responsible approach to manufacturing and managing their emissions

Supply Chain Human Rights



We work with companies that uphold the highest human rights standards through their operations and supply chain

Products Made Sustainably

Products that use sustainable materials or are designed to minimise their impact

Sustainable Raw Materials



We ensure that our products use the most sustainable materials and ingredients available

Sustainable Packaging



We use innovative formats and materials using minimal resources. We aim to lead the way in sustainable pet care packaging

Circular Business



We follow circular principles, to ensure products are designed in ways that maximise the value of the resources used

Who does this guidance apply to?

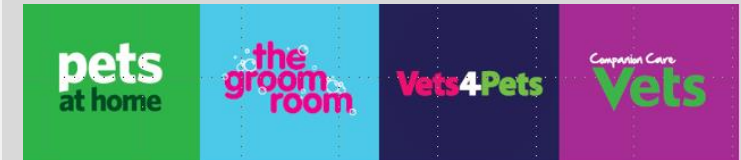
Our [Supplier Code of Conduct](#) and the supporting guidance contained in this handbook applies to all retail and procurement suppliers of goods and services, contractors and business partners.



Our transparency requirements and monitoring programme (outlined in pages 8-12) do not currently extend to retail or procurement supplier brands unless products are exclusively supplied to Pets at Home in the UK, or we consider it to be a tertiary brand. However, we do expect supplier brands to have adequate governance in place to ensure that they meet these standards.



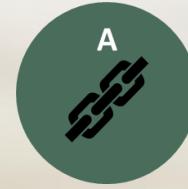
OWN LABEL - Product or packaging bearing a Pets at Home Group brand logo or name.



EXCLUSIVE BRAND – A supplier brand only sold in the UK by Pets at Home.

TERTIARY BRAND – Unbranded product or brand with no established brand recognition.

Transparency



Supply chain transparency

To ensure that human rights are safeguarded, and the environment is protected, we must know where our products are made.

No production should commence until suppliers have received notification that the final manufacturing site and any packing site is approved by the Pets at Home Technical and Responsible Sourcing Teams. This approval is granted for a particular manufacturer, at a particular address. Production should never be subcontracted, outsourced or relocated to a new production site without prior approval from Pets at Home.

Please contact us if you are experiencing any difficulties and need to make contingency arrangements. Otherwise, unauthorised subcontracting represents a critical breach of our supplier terms and conditions



Public disclosure of our supply chain information

Increased transparency of supply chain information not only demonstrates our joint commitment to responsible sourcing but also helps us better track and manage social, environmental and governance risks. It is a requirement of our Supplier Code of Conduct that we can publish details of the factories used by our suppliers.

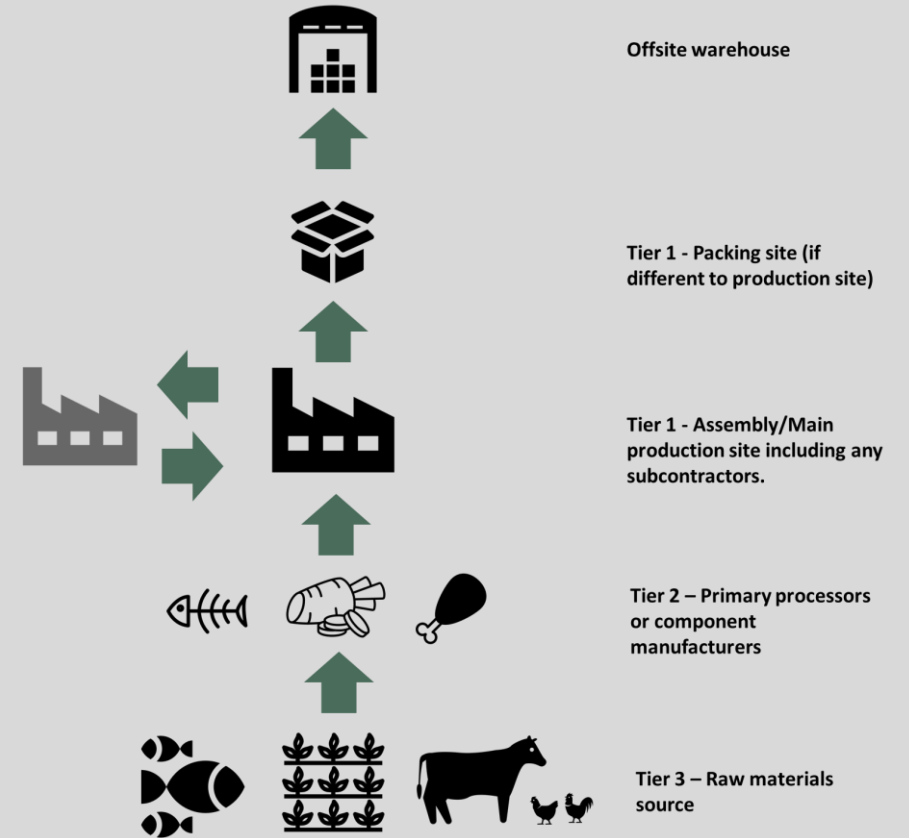


Supply chain mapping

We want to support our suppliers in building strong responsible sourcing programmes, so it is important that we also understand where components and ingredients which make up our products are sourced from. We require full disclosure of these sources and request our suppliers also have supplier agreements in place which ensures shared visibility back to raw material sources.

We require our suppliers to map their supply chain back to at least tier 2 (primary processors) and where possible, for high-risk commodities, back to tier 3 (raw materials source).

We also require visibility of all outsourced packing sites, subcontractors and offsite warehousing used to supply Pets at Home.



Right to audit

We reserve the right to conduct surveillance audits to ensure compliance to this Supplier Code of Conduct. These audits may be announced, semi-announced or completely unannounced and will be undertaken by either a Pets at Home colleague or a designated and authorised 3rd party.

Sedex



All Pets at Home own label, brand exclusive and tertiary brand suppliers are required to:

1. Join Sedex
2. Link their Sedex account to Pets at Home
3. Complete the self-assessment questionnaire and review this annually



Pets at Home is a member of Sedex. Sedex is collaborative platform which allows us to manage our supply chain responsible sourcing data and allows suppliers to share ethical audit reports with multiple customers.

There are two types of membership for suppliers:

- Supplier (B) membership is suitable for all manufacturing sites and has a fixed annual fee. See [Sedex](#) for current membership fees.
- Buyer/Supplier (AB) membership is optional but may be most appropriate for trading companies or suppliers looking for a tool to manage their own responsible sourcing programme. The AB membership fee is based on company turnover. See [Sedex](#) for current membership fees.

If you have any questions about the set-up process, please direct these to the [Sedex helpdesk](#)

Once you've joined Sedex you can find guidance on linking to Pets at Home via the Sedex e-Learning module.

Ethical audits



SMETA

Unless otherwise advised, all Pets at Home own label, brand exclusive and tertiary brand suppliers are required to complete a Sedex Members Ethical Trade Audit (SMETA) which meets the following criteria:

- ✓ No older than 12 months at the time of onboarding and conducted at least every 2 years thereafter *
- ✓ Completed either as an unannounced or semi-announced audit in at least a 3-week window. Announced audits will not be accepted unless there are exceptional circumstances.
- ✓ The audit should take place at a time of year when production levels are normal or at peak. Low production/out of season audits will not be accepted.
- ✓ Audit conducted by a [Sedex affiliate audit company](#). **You must confirm to the audit company at the time of booking that Pets at Home is your customer and give them permission to discuss your audit report with us.**
- ✓ The audit report should be uploaded to the Sedex platform, and any non-conformances verified as closed by the audit company or a timebound non-conformance action plan submitted and approved by Pets at Home Responsible Sourcing Team. Close out may require a follow up audit.
- ✓ The audit report is owned by the supplier and the audit shall therefore be supplier funded.

* Please note that we will be moving to a risk assessment model for determining audit frequencies in the future but will contact you to confirm individual supplier risk ratings before this change takes effect.

If you are unable to meet the full criteria above, please contact our Responsible Sourcing Team to discuss.

Responsible Sourcing Audits

Our Responsible Sourcing Audits assess compliance to our Supplier Code of Conduct but it's also a great opportunity for us to get to know our suppliers better. We take a management systems approach to understanding how well our suppliers identify and manage relevant risks in their own operations and also in the upstream supply chain. If we find non-conformances, we'll share best practice guidance and allow time for sustainable corrective and preventative actions to be introduced. What we ask from our suppliers in return is transparency and a commitment to continuous improvement. There is currently no defined schedule for these audits but we're planning to visit all own label manufacturing sites in due course.



Our approach to non-conformances

We recognise that our suppliers may need time, support and practical guidance to meet our requirements. We commit to working collaboratively to help our suppliers to improve their performance. However, where standards are persistently not met or we encounter a zero-tolerance issue without timely resolution, we will end our business relationship. Zero-tolerance issues are explained in the following sections.

Where non-conformances are graded, the criticality assigned will be in accordance with Sedex guidance. All findings, irrespective of grade, represent an opportunity to improve and we therefore expect suppliers to work on addressing the root cause of all identified non-conformances. Where there are systemic challenges impacting a suppliers ability to implement effective corrective actions, a non-conformance action plan should be developed and submitted to Pets at Home for approval. We expect suppliers to commit to working over time to make incremental improvements to address the root cause of these challenging issues.



Responsible Sourcing Guidance

We recognise that our suppliers may need support to meet our [Supplier Code of Conduct](#) and the following section is intended to offer a practical interpretation of our expectations.

The provisions of our Code of Conduct constitute minimum and not maximum standards and should not be used to prevent suppliers from exceeding these standards.

Click on icon to move to section



Our guidance does not constitute legal advice as suppliers are expected to understand their legal obligations in the countries and territories in which they operate. However, where the provisions of law and this guidance addresses the same subject, suppliers should apply the provision which affords the greater protection.



Business is conducted lawfully and ethically

Bribery and corruption exacerbates inequalities, poverty, social division and environmental damage. It also erodes trust and increases the cost of doing business.



Our commitment

Pets at Home Group is committed to running our business operations to the highest ethical and professional standards and we expect the same from our suppliers.

See our full [Anti-Bribery Policy](#) and [Code of Ethics and Business Conduct](#)

Any relevant concerns or non-compliance with our policies can be directed to either our confidential Whistleblowing Helpline on 0808 168 3620 or by contacting supplychainwhistleblowing@petsathome.co.uk



Pets at Home does not tolerate any form of bribery, corruption or fraud and we will end our business relationship if we find evidence of such wrongdoing

Supplier Code of Conduct

Suppliers must conduct business ethically without bribery, corruption or any fraudulent, unethical or illegal business practices and ensure compliance to all relevant local and national laws.



Supplier Guidance

1.1 Business Ethics Policy

Suppliers shall develop a business ethics policy which is communicated to their workforce and business partners

This shall include:

- ✓ The naming of a senior manager responsible and accountable for business ethics compliance.
- ✓ A commitment to conduct business ethically without bribery, corruption or any fraudulent, unethical or illegal business practices and ensure compliance to all relevant local and national laws.
- ✓ An explanation of and zero-tolerance approach to bribery (offering/paying and soliciting/accepting) and facilitation payments.
- ✓ Rules about accepting and offering gifts, hospitality, political and charitable donations.
- ✓ Rules on avoiding conflicts of interest.
- ✓ An explanation on how reports of unethical business conduct, made in good faith, can be confidentially reported without fear of reprisal.
- ✓ Consequences for non-compliance.

1.2 Risk assessment

A bribery risk assessment shall be completed, and adequate procedures introduced to effectively manage bribery risks.

1.3 Training

A suitable training programme shall be in place for high-risk roles (e.g., sales, senior managers, procurement, account managers) to avoid bribery and corruption risks.

1.4 Internal audit

Compliance to business ethics policies and procedures shall be assessed as part of the organisation's internal audit programme.



Additional Resources

Transparency International – [Diagnosing bribery risk](#)

UK Bribery Act 2010 – UK Government – [Quick Start Guide](#)

Transparency International – [Corruption Perceptions Index](#)



Training Resources

Transparency International – [Free eLearning](#)

2



Trade restrictions and sanctions are complied with

Breaches of financial and trade restrictions not only brings significant reputational risk and erodes the trust of our customers and investors, but it is also a criminal offence which is subject to significant monetary and criminal penalties including imprisonment.



Our commitment

Pets at Home complies with all trade restrictions and sanctions applicable to our business activities and we support our suppliers to map their value chain to support the identification of sanctions risks.



Sanctions are restrictions put in place by the UN and governments to achieve a specific foreign policy or national security objective and to maintain international peace and security. Sanctions restrict dealings with certain individuals, companies or organisations, ports, ships, aircraft, industry sectors or countries. They include financial restrictions such as targeted asset freezes, restrictions on a wide variety of financial markets and services, and directions to cease business with sanctioned individuals, entities, sector or country; import and export restrictions of certain goods and technology (including arms embargoes) and travel bans. Sanction rules are complex and subject to regular change. UK sanctions are particularly important for Pets at Home but EU, US and other sanction regimes may be applicable due to the origin of goods, the nationality of employees, shareholders and directors or the currency that financial transactions are conducted in.

2



Supplier Code of Conduct

Pets at Home complies with all trade restrictions and sanctions applicable to our business activities. We require all suppliers to implement adequate controls and processes including screening and due diligence to ensure they do not engage with embargoed territories or sanctions targets.



ZERO
TOLERANCE

Supplier Guidance

2.1 Sanctioned entities

Suppliers shall not breach any applicable sanctions, shall not be a sanctioned party (owned or controlled by one) and shall not source from, or distribute to prohibited entities, sectors or countries.

2.2 Company ownership and control

Suppliers shall disclose the direct and indirect ownership and control structure of their organisation, as well as changes to ownership, to enable Pets at Home to complete sanctions screening. Changes in direct or indirect ownership shall be disclosed.

2.3 Due diligence

Suppliers shall have systems in place to understand its sanctions obligations and ensure compliance.

a) A risk assessment shall be completed to understand the business exposure to specific sanctions regimes based on:

- ✓ How the business is organised and where it is located.
- ✓ Where it trades.
- ✓ The nationality of employees, shareholders and directors.
- ✓ Where goods and services are sourced from and delivered to.
- ✓ Who goods and services are sourced from and delivered to.
- ✓ Who transports goods and via what routes.
- ✓ What currency financial transactions are completed in.

b) An internal sanctions policy shall be in place with supporting guidance and training for relevant colleagues. This shall include information about the consequences of non-compliance.

c) Suppliers shall screen direct and indirect parties (suppliers and customers) against restricted lists.

d) Suppliers shall map their supply chains to ensure goods or services are not sourced from a sanctioned entity or location.

e) Express sanctions and trade control compliance clauses shall be added to contract terms.

f) There shall be an ongoing monitoring programme in place to ensure continued compliance and applicability of sanctions controls. Suppliers shall register with applicable bodies to receive online alerts for changes to the nature of sanctions and sanctioned entities.

Pets at Home will not trade with any sanctioned party and will not source from any prohibited entities, sectors or countries.



Additional Resources

[UK Sanctions list](#)

[EU Sanctions Map](#)

[US Department of Treasury Sanctions Programmes and Country Information](#)

[United Nations Security Council Consolidated List Search](#)



Privacy is protected

We live in a globalised world where data transfers seamlessly across the internet and technological advances means more data, including biometric data, is collected about us. The right to privacy is enshrined in the Universal Declaration of Human Rights. Having the freedom to choose how our personal data is collected and used is critical for upholding this right to privacy.

Data privacy laws vary in different countries and can be complex with significant consequences for non-compliance, so it is critical that suppliers understand their obligations and have suitable systems in place to protect and prevent the misuse of data.



Our commitment

Pets at Home has strong data protection policies supported by a mandatory training programme for our colleagues. We commit to supporting our suppliers to build strong systems to protect and prevent the misuse of worker data.



Supplier Code of Conduct



Suppliers must have adequate systems in place to protect confidential information and to comply with all relevant laws relating to data protection and privacy protection.

Supplier Guidance

3.1 Policy

A data protection policy shall outline how suppliers ensure information about their employees (and job applicants) is processed responsibly and in compliance with all relevant data protection laws. This shall be available to all relevant parties and include:

- ✓ What data is collected and the legitimate reason for collecting it.
- ✓ How data is kept to a minimum and kept accurate.
- ✓ How long data will be retained
- ✓ Arrangements for maintaining data integrity, confidentiality and security.
- ✓ Arrangements for obtaining consent to process data and share personal data with any other organisations.
- ✓ Keeping data protection arrangements under review.
- ✓ How workers can request more information or raise concerns.
- ✓ Any specific local regulatory requirements to register, notify breaches or pay fees e.g., Data Protection fee paid by data processors in the UK to the Information Commissioner's Office (ICO).

3.2 Surveillance

Worker surveillance shall not be excessive, overly intrusive or used unless there is a legitimate reason to do so. This includes recording calls, monitoring email or internet use, conducting searches and using surveillance cameras. Workers should be made aware of all potential surveillance activity. Only where there is suspicion that a worker is breaking the law, should workers be monitored without their knowledge and only where this is permitted under local law.

3.3 Surveillance cameras

- a) Signs shall be displayed notifying workers that surveillance cameras are in use and the reason why.
- b) A documented procedure shall be communicated to responsible parties and the workforce to include:
 - ✓ Who is accountable for surveillance camera monitoring.
 - ✓ The legitimate reason for using surveillance cameras.
 - ✓ How images and information is securely stored to safeguard against unauthorised access and use.
 - ✓ How access to surveillance camera system images and information is restricted to only authorised and named persons and released for legitimate reasons only (which shall be defined).
 - ✓ How long images and information will be retained.
 - ✓ How workers can request more information or raise complaints.



Supplier Guidance

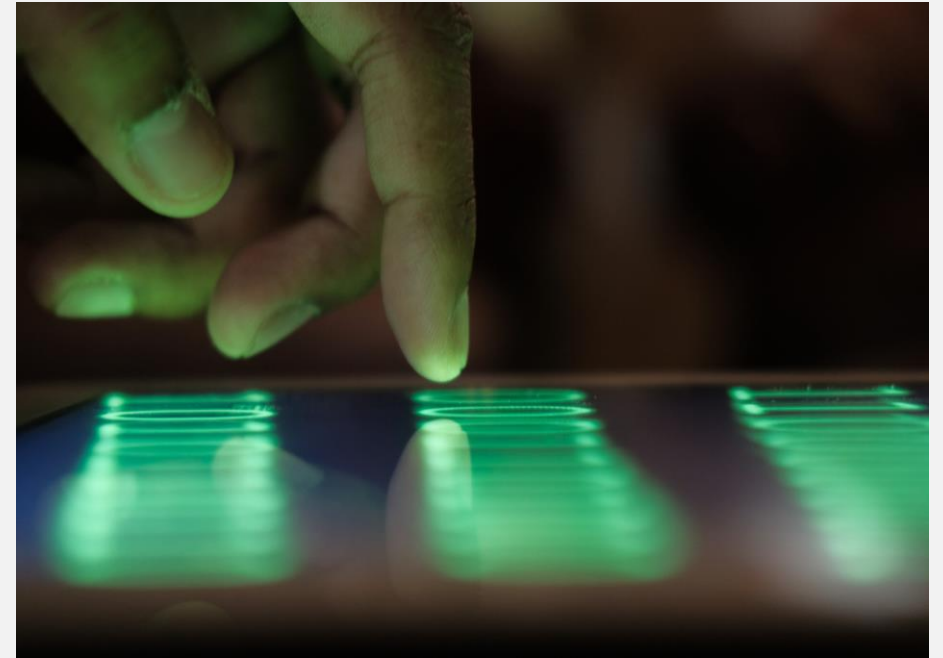
3.4 Cyber security

Suppliers shall have appropriate cyber security arrangements in place to ensure that:

- ✓ Security risks are managed.
- ✓ Personal data is protected against cyber-attack.
- ✓ Security events are detected.
- ✓ The impact of security events is minimised.

3.5 Review

An effective and comprehensive internal audit programme shall be in place to test the effectiveness of all data protection arrangements.



Additional Resources

UK Specific resources:

- UK Government – [General guidance for business](#)
- UK Information Commissioner's Office (ICO) - [Guide to data protection](#)
- UK Information Commissioner's Office (ICO) - [Data protection self-assessment](#)
- UK Information Commissioner's Office (ICO) - [Data protection fee](#)
- UK National Cyber Security Centre – [Cyber Security guidance](#)
- UK Information Commissioner's Office (ICO) - [Guidance on video surveillance including CCTV](#)



No forced labour

In 2016 the ILO estimated that 40.3 million people were in modern slavery, including 24.9 million in forced labour. 1 in 4 victims of modern slavery are children. Out of the 24.9 million people trapped in forced labour, 16 million people are exploited in the private sector such as domestic work, construction or agriculture; 4.8 million persons in forced sexual exploitation, and 4 million persons in forced labour imposed by state authorities. Women and girls are disproportionately affected by forced labour. ¹

Any association or implication of forced labour brings severe reputational, operational, and financial risks for business.

SUSTAINABLE DEVELOPMENT GOALS

8 DECENT WORK AND ECONOMIC GROWTH



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



¹ [Source](#)



Our commitment

We use audit information, self-assessment data and Sedex reports to identify any forced labour indicators. We commit to investigate any relevant concerns with our suppliers and to also support the development of strong management systems for identifying and preventing forced labour in our shared supply chain.



The ILO has identified several indicators or signs which may suggest the possible existence of a forced labour situation:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

4



**ZERO
TOLERANCE**

If a supplier knowingly uses or benefits from forced labour, this will be treated with zero tolerance, and we will end our business relationship.



Supplier Code of Conduct

Suppliers must under no circumstances use or benefit from any form of involuntary labour including forced, trafficked, bonded, indentured or prison labour. Workers' freedom of movement shall not be restricted in either the workplace or their accommodation and workers' personal documents must not be retained. Workers must not be charged any recruitment or employment fees.

Supplier Guidance



Even where prison labour is reported to be voluntary, it is often very difficult to adequately assess if labour rights are being fully met. It is therefore highly unlikely that we would be able to approve any use of prison labour within our supply chain. If you suspect or identify the use of prison labour, please notify us immediately.

4.1 Policy

A written zero-tolerance policy prohibiting forced, bonded or involuntary prison labour shall be established and communicated within the organisation and to suppliers.

4.2 Public reporting

Any requirement for public reporting shall be fulfilled (e.g., UK Modern Slavery Act, California Transparency in Supply Chains Act, Australian Modern Slavery Act)

4.3 Management systems

- a) Adequate systems shall be in place to identify and prevent forced labour, modern slavery or human trafficking within the supplier's own operations and their supply chain.
- b) Training shall be provided to relevant managers/recruitment officers/workforce to recognise forced labour indicators and how to report concerns.

4.4 Prison Labour

There shall be no use of involuntary prison labour. Where prison labour is exceptionally approved, there shall be adequate systems in place to ensure labour rights are protected.

4.5 Freedom of movement

There shall be no restriction of worker movements (either in the workplace or in business provided accommodation).

4.6 Financial freedom

- a) Workers shall have control of their own bank accounts.
- b) Checks shall be completed to ensure that wages are paid into a bank account in the worker's own name.
- c) There shall be no forced savings programmes in place.
- d) Workers shall not be required to lodge any deposits.
- e) There shall be no financial penalties charged.
- f) Where the business loans money to employees, repayment terms are reasonable and do not bond workers to their employment. Ideally loans are interest-free and where this is not possible, interest rates are reasonable and less than normal market rates.
- g) No unreasonable bonus retention scheme shall be in place which has the impact of unreasonably bonding workers to their employer.



If a supplier knowingly uses or benefits from forced labour, this will be treated with zero tolerance, and we will end our business relationship.

Supplier Guidance

4.7 Identification documents

Identification documents shall be held by workers. Where required, secure storage shall be provided but workers must have immediate access.

4.8 Communication devices

Communication devices (and other valuables) shall be held by workers. Where required, secure storage is provided but workers must have immediate access.

4.9 Overtime

Overtime shall always be voluntarily worked.

4.10 Leaving employment

- a) There shall be a clear process in place for workers to resign.
- b) Workers shall not be tied into a minimum employment period.
- c) Contractual notice periods are reasonable, meet legal requirements and confirmed within employment terms and conditions.
- d) No unreasonable employment covenants shall be in place which restrict workers moving to another employer.
- e) Any legal requirement to issue a formal end of employment notice, shall be processed in a timely manner e.g., P45 in the UK.

4.11 Accommodation charges

- a) Any accommodation charges shall meet legal limits and shall not be excessive.
- b) Workers shall agree in writing to any accommodation charges and taking accommodation shall not be a condition of employment.
- c) Any notice to leave accommodation shall be reasonable.



Additional Resources

International Labour Organization – [General guidance and instruments](#)

US Department of Labor International Labor Affairs – [Forced Labour data](#)

ILO – [Indicators of forced labour](#)

Verite – [Commodity Atlas](#)

Stronger Together – [Various resources](#)

UK Government – [Modern Slavery Awareness](#)

ETI – [Modern Slavery Guidance](#)

Sedex – [Recognising risks in global supply chains](#)

Responsible Sourcing Tool – [Understanding risk](#)

Stop the Traffik/Shiva Foundation – [Modern Slavery SME Toolkit](#)



Training Resources

UK Border Force – [Human trafficking awareness for first responders](#) – free eLearning



The right to freedom of association and collective bargaining are respected

Freedom of association and collective bargaining are enabling rights. Where effective consultation and negotiation exists between employers and workers, all labour rights are improved. If workers are given a collective voice in setting and monitoring working conditions, this brings significant business benefits including improved colleague wellbeing, engagement, retention and increased productivity.

Unfortunately, according to the ITUC's annual Global Rights Index, abuses of the right to establish and join a trade union are at a nine-year high¹.



¹ [Source](#)



Our commitment

Pets at Home fully respects and supports our colleagues' right to establish and join a trade union of their choice without fear of reprisal, intimidation or harassment. Where our colleagues are represented by a legally recognised trade union, we commit to collective bargaining in good faith.

We recognise the 3 fundamental ILO Conventions:

- ILO Convention 87 which protects the right of workers to form and join the trade union of their choosing;
- ILO Convention 98 which protects workers' right to bargain collectively with their employer and to remain free of employer interference and dominance;
- ILO Convention 135 protects worker representatives from discrimination and recognises the right of worker representatives to access to workplaces in order to carry out their representation functions.

You can find out more about our mechanisms for colleague engagement and consultation in our [Social Value Report](#)

In our supply chain, we use self-assessment questionnaires, audit information and supplier visits to compile data on which of our tier 1 suppliers are unionised or have alternative (and effective) worker representation established. We commit to work with our suppliers to promote mechanisms for effective and respectful social dialogue. We actively seek opportunities to engage directly with worker representatives.



Supplier Code of Conduct



Suppliers must respect the rights of workers to freedom of association and collective bargaining. This includes the right to form or join unions or associations of their choice. Where this right is restricted under local law, parallel means for independent and free association and collective bargaining must be permitted. No workers should be discriminated against or unfairly treated based on their membership of a union or association, or for choosing to refrain from such membership. In the absence of an established or legally mandated trade union agreement, the supplier shall have alternative systems in place for effective consultation with workers and workers representatives.

Supplier Guidance

5.1 Freedom of Association Policy

a) A freedom of association policy and supporting procedures shall be in place which confirms:

- ✓ Respect for workers right to associate and bargain collectively without fear of reprisal, intimidation or harassment.
- ✓ Any restrictions in law and how principles of independent and free association and collective bargaining are still respected.
- ✓ Mechanisms in place for effective communication and consultation between workers and management.
- ✓ Training which will be provided to workers and managers.

b) Policies and procedures shall be reviewed at least annually, and their effectiveness tested as part of the organisation's internal audit programme.



5.2 Recognised trade unions

Where trade unions are recognised by the supplier, the following shall be in place:

- ✓ The trade union is registered where required by law.
- ✓ Free elections are conducted to appoint sufficient numbers of independent worker representatives.
- ✓ The role of worker representatives is included in the site induction programme and representatives are clearly identified to other workers e.g., photos on the noticeboard.
- ✓ Collective bargaining negotiations are entered into when requested by legally recognised representatives; terms shall be freely negotiated between worker representatives and management and agreements shall be honoured.
- ✓ Any strikes are appropriately resolved in line with local law.

5.3 Legal restrictions

Where there are legal barriers to freedom of association and collective bargaining, suppliers shall take steps to respect this right to the fullest extent permitted under local law. We also strongly encourage suppliers to use their influence with Government to advocate for changing laws which restrict freedom of association.



Supplier Guidance

5.4 Non-unionised worker representation

a) Where there is no established trade union and the business employs more than 100 workers, a workers' committee shall be established, and a constitution agreed as a first step towards effective communication, consultation and negotiation. Legal requirements should prevail if there is a requirement for worker representation at sites with less than 100 employees.

The workers' committee shall be:

- ✓ Independent.
- ✓ Representatives freely elected.
- ✓ Meet regularly with management.
- ✓ Produce meeting records.
- ✓ Effectively represent workers by evidencing an improvement of labour rights and workplace conditions.

b) Where suggestion boxes are used, there shall be a transparent mechanism to feedback to workers on decisions made regarding their suggestions.

c) Where worker surveys are used, results are analysed, fed back to workers and action plans developed to enhance working conditions.

5.5 Worker Representatives

Union and worker representatives are provided with:

- ✓ Reasonable paid time off to carry out relevant duties and activities.
- ✓ Have adequate access to management, members and new recruits.
- ✓ Permission to share information (post notices and distribute documents).
- ✓ Provided with office space and appropriate resources.
- ✓ Are supported in the collection of union dues/subscriptions, where required.



Additional Resources

International Labour Organization – [General guidance and instrument](#)

ETI – [Freedom of association in company supply chains](#)

Fair Wear – [Freedom of Association Brand Guide](#)

ITUC – [Global Rights Index](#)

OECD – [Collective Bargaining Guidance](#)



Health, safety and wellbeing at work is protected

Health and safety principles are universal but unfortunately too often a poor safety culture combined with weak government enforcement means that people are working across the world in inherently dangerous environments. This either presents an immediate risk to safety or occupational exposure to hazardous substances increase the risk of developing chronic diseases over time.



SUSTAINABLE DEVELOPMENT GOALS

3 GOOD HEALTH AND WELL-BEING



8 DECENT WORK AND ECONOMIC GROWTH



Our commitment

We commit to working with our suppliers to raise awareness and share best practice in building strong health & safety management systems which includes worker education and consultation at its foundation. If issues are found, we'll give appropriate time to not only correct the issue but to ensure the root cause of poor compliance is sustainably addressed.



Supplier Code of Conduct

Suppliers must provide and maintain a safe and hygienic workplace to protect their workforce from harm arising from accidents, injuries and occupational diseases.



Supplier Guidance

6.1 Factory licences and business insurance

- ✓ All required factory licences have been obtained from the authorities (including fire and structural safety).
- ✓ Valid business insurance/employer's liability insurance is in place.

6.2 Management Systems

a) Adequate policies and governance shall be in place to effectively manage health & safety:

- ✓ A senior management representative shall be accountable for health & safety
- ✓ A health & safety policy shall be developed to explain expectations and arrangements for health & safety. This shall be communicated to the workforce.
- ✓ A competent person (by training and experience) shall be responsible for day-to-day management of health & safety arrangements.
- ✓ A health & safety committee with worker representatives shall meet regularly and meeting minutes shall be documented. Action shall be taken to address any health & safety concerns as quickly as possible.
- ✓ Management meetings shall be conducted regularly to review key metrics and outputs of the health & safety internal audit programme. The business shall prioritise and designate adequate funds to the effective mitigation of health & safety risks.
- ✓ A compliance tracker shall be created to ensure all legally required health & safety actions are identified and tracked. An action plan shall be developed for any compliance gaps and improvement opportunities identified.

b) Risk assessments shall be developed which:

- ✓ Comprehensively consider all risks (Including but not limited to): fire, explosion, use of work equipment and guarding, electricity, working at height, working in confined spaces, lone working, pregnancy and new mothers, young and vulnerable persons, legionella, hazardous substances including dust, workplace transport, manual handling, noise, temperature, radiation, asbestos, slips and trips, driving, fatigue, violence, striking an object or being struck by a moving object, communicable diseases e.g. Coronavirus,
- ✓ Are recorded with an effective system to track any action plans through to completion.
- ✓ Are completed by competent persons (with relevant training and experience) and in conjunction with workers.
- ✓ Are reviewed at appropriate frequencies and when there is any material change and routinely after an accident or serious incident.
- ✓ Are used to develop documented safe systems of work.

c) Regular workplace inspections shall be completed to verify that health & safety hazards are adequately controlled, and behaviours monitored. This includes Identifying good as well as incorrect behaviour as it can help to embed a positive health & safety culture. Any identified issues are added to an action plan and tracked to completion.



Supplier Guidance

d) An adequate system shall be in place to ensure that equipment is inspected and serviced at frequencies required by law and risk assessment. This includes production machinery (including start-up checks on safety devices), ladders, fire-fighting and fire detection equipment, emergency lighting, local exhaust ventilation equipment, lifting equipment; forklifts, vehicles, PPE, harnesses, gas appliances, pressure plant, racking, fixed wiring, portable electrical appliances. Procedures shall be in place to ensure that machinery is made safe for maintenance.

e) Emergency evacuation procedures shall be documented and tested regularly. The frequency of drills should be in line with risk assessment and any local law requirement including dark hours drills where appropriate. Individuals requiring additional support (e.g., young or disabled workers) shall be identified and a support plan developed.

f) All accidents and incidents shall be:

- ✓ Recorded.
- ✓ Investigated where appropriate with a root cause analysis and any corrective actions tracked through to close out.
- ✓ Notified to any statutory body (where legally required).
- ✓ Compiled on management reports to help identify any trends which could require further investigation.

g) An effective and comprehensive internal audit programme shall be in place to test the effectiveness of all health & safety arrangements.

6.3 Shared business premises

Production sites which share their facilities with other companies (whether associated businesses or not) shall ensure that fire safety arrangements are coordinated for the whole building to ensure adequate fire safety provisions are in place.

6.4 Enforcement activity

Suppliers shall advise Pets at Home of any health & safety enforcement action by local/national authorities and shall have similar notification requirements in place with their suppliers.



Training Resources

[IOSH Managing Safely](#)

Contact training partners for costs

[NEBOSH General Certificate in Occupational Health & Safety](#)

Contact learning partners for costs



Supplier Guidance

6.5 Adequate health & welfare provisions are provided

- a) Worker welfare provisions shall be adequate and effective systems shall be in place to ensure that they are well maintained. This includes facilities for: washing, changing, storing clothes and valuables, toilets, eating, drinking, the provision of drinking water, food storage and preparation.
- b) Any legally required licences/certificates for food preparation facilities or personnel shall be obtained and systems in place to ensure they are kept up to date.
- c) Regular workplace inspections shall be completed in conjunction with worker representatives.
- d) A suitable occupational health surveillance programme shall be in place which includes all legally mandated health checks pre-employment, during employment and post-employment.
- e) A first aid needs assessment shall be completed and all required first aid equipment/trained personnel required by law and risk assessment shall be provided. Regular checks shall be completed to replenish used first aid provisions and to replace any out-of-date supplies.
- f) Appropriate PPE is provided.

6.6 Training

- a) A health & safety training programme shall be in place which includes:
 - ✓ All training which is required by law and identified as necessary by risk assessment.
 - ✓ All job roles shall have a training matrix (or similar system) which identifies training needs.
 - ✓ The site induction programme/role specific training includes all the information needed to be safe at work.
 - ✓ Training records are maintained for all workers.
- b) The effectiveness of the training programme shall be assessed:
 - ✓ Tests are conducted to ensure that workers understand the learning objectives.
 - ✓ Behaviour in the workplace shall be monitored to ensure correct practice.
 - ✓ Trainers are competent and where the site induction is delivered by a service provider, the delivery of training shall be assessed at appropriate intervals.
 - ✓ Worker representatives shall be consulted to improve training.
 - ✓ Training shall be delivered in different languages where necessary to ensure clear understanding.

c) Training is refreshed:

- ✓ Training material shall be regularly reviewed and updated when there are any material changes. Training material is version controlled.
- ✓ The frequency of refresher training shall be defined within the training matrix (or similar system) and adequate procedures shall be in place to prompt the renewal of training.
- ✓ The completion of training shall be a metric which is monitored by the leadership team and included within the scope of internal audits.



Additional Resources

International Labour Organization –
[General guidance and instruments](#)

Health & Safety Executive –
[Guidance - Britain](#)



Children are protected

UNICEF estimates that nearly 1 in 10 children are subjected to child labour worldwide, with almost half of them engaged in some form of hazardous work and many forced or trafficked into work.¹

The COVID-19 pandemic has exacerbated the root causes of child labour including poverty, limited access to quality education and a lack of decent employment opportunities for working adults. Furthermore, displacement caused by armed conflict, climate change and environmental disasters is predicted to fuel an increase in migration, which we know will put even more children at risk of exploitation

We believe that all children have the right to an education and any work entered into by a child or young worker must never interfere with this, nor cause any mental, physical, social or moral harm.



¹ [Source](#)





Our commitments

Child labour

We are committed to eliminating child labour from the whole of our supply chain by taking a preventative approach. Beyond audit, we use industry data and risk assessment tools to identify child labour risks. A child labour risk assessment is completed with every new supplier. We then engage directly with high-risk suppliers to ensure strong recruitment processes are in place for preventing child labour in their own operations. We also work collaboratively to support the assessment of child labour risks in lower tiers of our shared supply chain.

Should we identify any underage workers in our supply chain, we commit to working with our supplier to ensure immediate safeguarding measures are put in place. We will support the arrangement of and provide appropriate financial support to enable the child to remain in some form of suitable educational or vocational programme until they are no longer a child. Upon course completion, we will then support their transition back into work if required. See our [Child Protection Procedure](#).

Young workers

Young people have been disproportionately impacted by the COVID-19 pandemic as the number of young people not in employment, education or training has risen in many countries. Young people who have reached the minimum age for employment should be protected but not excluded from access to safe work. If we identify young workers in a hazardous environment, we commit to working with our supplier to ensure they are immediately transferred to an alternative suitable role or alternative employment with no detriment to pay. Arrangements will be carefully monitored until the young worker reaches 18 years of age.

We use information from audit reports and Sedex SAQ data to identify young workers in our supply chain. We then engage directly with our suppliers to ensure young workers are safe and appropriately supported in their work.

Youth Employment

We are committed to promoting youth employment in our business and with our supply chain partners. We're proud to partner with The Prince's Trust, Retail Trust and The Social Mobility Partnership to offer a variety of employability programmes and work experience opportunities.

In our supply chain we are always looking out for opportunities to link suppliers with local organisations which promote and support youth employment. Please contact our Responsible Sourcing Team if you have any good examples to share.



If a supplier knowingly employs children under legal working age or knowingly puts young workers at risk of harm, this will be treated with zero tolerance, and we will end our business relationship.



Supplier Code of Conduct



Suppliers must only employ individuals who have reached the legal minimum age for employment or the age of completion of mandatory education. Even where local law allows for lower limits, this shall never be less than 15 years of age. Where young workers under the age of 18 years are employed, work must not interfere with their education, nor cause any mental, physical, social or moral harm. Suppliers must take appropriate steps to identify and reduce child labour risks within their supply chain.

Supplier Guidance



If you identify child labour in your own operations or our shared supply chain, please notify our Responsible Sourcing Team as soon as possible so we can provide support. We require all supply chain partners (implicated vendor supplier and manufacturer) to jointly share in the management of, and costs associated with, child labour remediation.

7.1 Preventing Child labour

- a) An employment policy shall be in place which includes:
 - ✓ A commitment to no child labour.
 - ✓ The legal minimum employment age and relevant ILO convention minimum age for admission to employment.
 - ✓ The minimum age of workers recruited by the organisation.
- b) Documented procedures shall outline:
 - ✓ Arrangements (including who is responsible) for completing pre-employment age verification checks for direct employees and any workers engaged via a contractor or labour agency. This includes completing in-person interviews and checking identity, age, signature and whether ID documents are genuine.
 - ✓ Arrangements for post-employment controls including managing the risk of someone assuming the identity of an employee or worker e.g., biometric time and attendance systems and photo ID.
 - ✓ The training and information which will be provided to responsible managers, contractors and labour providers.
- c) Policies and procedures shall be reviewed at least annually, and their effectiveness tested as part of the organisation's internal audit programme.

7.2 Planning a response to child labour

- a) A child protection/child labour remediation procedure shall be in place which details:
 - ✓ The immediate steps which will be taken to ensure the safety and wellbeing of any child found working, any young person found working in a hazardous environment and the details of any organisations which will be engaged to provide support.
 - ✓ Commitment to provide financial support to the child which allows them to access suitable healthcare (for conditions arising from occupational exposure), education and additional financial support which compensates the family unit for lost income.
 - ✓ Arrangements to support the child back into employment (if required) when they reach legal working age.
- b) A training programme shall be in place for responsible managers and colleagues visiting suppliers, so they understand how to respond and escalate if they identify or suspect child labour.
- c) The child protection/child remediation procedure shall be reviewed at least annually.



If a supplier knowingly employs children under legal working age or knowingly puts young workers at risk of harm, this will be treated with zero tolerance, and we will end our business relationship.

Supplier Guidance

7.3 Young Workers

a) Where young persons under 18 are recruited, the employment policy and supporting procedures shall include:

- ✓ Which roles are suitable for under 18s and which roles are restricted because they are considered hazardous.
- ✓ The details of all legal restrictions imposed on children and young workers and arrangements for meeting these (including employment permits, parental agreements, restrictions on working hours and break entitlements).
- ✓ Arrangements for safeguarding including whilst staying in business provided accommodation (if applicable).
- ✓ Arrangements for ensuring health & safety including risk assessments and training of young workers.
- ✓ Responsibilities and training of supervisors/managers responsible for young workers.

b) Policies and procedures shall be reviewed at least annually, and their effectiveness tested as part of the organisation's internal audit programme.

7.4 Responsible Sourcing

a) Suppliers shall communicate a zero-tolerance approach to child labour within their supplier agreements. This could either form part of supplier terms and conditions or a code of conduct which is shared with and acknowledged by suppliers and service providers.

b) Suppliers shall complete a child labour risk assessment for new and current suppliers.

c) Where there is a high risk of child labour, suppliers shall undertake monitoring activities of their suppliers to ensure strong controls are in place for the prevention of child labour. This should take the form of an onsite audit (unannounced/semi-announced where possible). High child labour risks cannot be adequately assessed remotely by self-assessment questionnaires.



Risk assessment

There are multiple supply chain risk assessment products on the market. Sedex A and AB members can access Sedex Radar which includes an assessment of child labour risks.

High risk factors

In the absence of a risk assessment product, some simple questions would allow you to assess child labour risks.

For these questions, a positive answer could indicate a higher child labour risk:

1. Has the country/industry/raw material been identified as high risk for child labour?
2. Is there a shortage of adult labour available?
3. Are there displaced migrant workers?

For these questions, a negative answer would indicate a higher child labour risk:

4. Does the government provide free and compulsory education?
5. Is there an established and effective government labour inspection programme



If a supplier knowingly employs children under legal working age or knowingly puts young workers at risk of harm, this will be treated with zero tolerance, and we will end our business relationship.



Additional resources

- US Department of Labor International Labor Affairs – [Child labour data](#) (also available as an app – ILAB Sweat & Toil)
- [Unicef Child Labour Data](#)
- Ethical Trading Initiative – [General guidance](#)
- International Labour Organization – [General guidance](#)
- Global Child Forum – [Policy Guidance](#)
- International Labour Organization -IOE – [Child Labour Guidance Tool for Business](#)
- International Labour Organization – [Supplier guidance on preventing, identifying and addressing child labour](#)
- International Labour Organization – [Eliminating and preventing child labour](#) (also available as an app)



Training Resources

The ILO/FOA offer various free [eLearning](#) courses related to this topic.



Fair wages and benefits

Low pay can drive high working hours, bonded labour and child employment as children are taken out of education to support their family income. Legal minimum wages across most of the world rarely meet living wage benchmarks which are calculated to ensure basic needs are met including adequate food, clothing, housing, access to healthcare and education.

Paying well makes good business sense; attracting the best talent to your business and helping to keep your people engaged and with you for longer. A more experienced and multi-trained workforce allows you to adapt better to challenges and lower worker turnover reduces business costs, saving not only on recruitment costs but also supervision and training. Being a living wage employer also makes a clear statement to current and perspective customers and can improve the reputation of your business.

For an explanation on Living Wage in the UK please see

<https://www.livingwage.org.uk/>

and globally <https://www.globallivingwage.org/implementation/>



Our commitments

We believe that people should be paid fairly for their work so they can support themselves and their families. As a minimum this must always meet legal minimums for pay and benefits and we will never knowingly negotiate prices which prevents this.

We actively encourage all our suppliers to benchmark themselves and develop wage improvement plans where appropriate. We document and monitor lowest pay rates across our value chain and benchmark our suppliers who pay a living wage (or those which demonstrate they are actively working towards this) above those who pay legal minimums.

If our purchasing practices are impacting your ability to pay a fair wage, please tell us by contacting supplychainwhistleblowing@petsathome.co.uk

SUSTAINABLE DEVELOPMENT GOALS





Attempts to deliberately hide, misrepresent or falsify pay information will be treated extremely seriously. If we lose trust in a supplier, we will end our business relationship.



Supplier Code of Conduct



All workers must be paid wages, overtime pay, benefits and paid leave which meets at least the legal minimum, any negotiated terms or appropriate prevailing industry standards, whichever is higher. Wages and benefits should always be enough to meet basic needs and provide some discretionary income. Deductions from wages must not be used as a disciplinary practice. Workers must be provided with clear and understandable pay information each time they are paid.

Supplier Guidance

8.1 Pay rates

- a) All workers shall be paid at least the local minimum wage for their role/grade and in line with their contract and any collective bargaining agreement.
- b) There shall be a system for keeping up to date with changes in minimum wage rates.
- c) Any piecework pay shall be at least equivalent to the legal minimum wage and arrangements shall be in place to top-up pay if productivity falls short.
- d) Overtime work shall be paid at a premium in line with legal requirements, contract terms and any collective bargaining agreement.
- e) All bonuses and premiums shall be paid in line with legal requirements, contract terms and any collective bargaining agreement.
- f) All workers shall be paid in direct proportion to the time worked and this shall include meetings, briefings, mandatory training and new-starter inductions.
- g) Workers shall be paid during production line stoppages in accordance with any legal requirements.
- h) Any flexible, casual and agency workers are paid a fair minimum payment for any attended booked shift, even if no work is subsequently available.

8.2 Benefits

- a) All workers shall receive their statutory and contractual entitlement to paid annual leave.
- b) All workers shall receive sick, maternity, paternity and adoption pay to which they are legally and contractually entitled.
- c) Accident/employer liability insurance shall be in place where legally required.

8.3 Payroll Records

Full and accurate wage records are retained. We work to support suppliers to correct non-conformances, but we will not accept deliberate attempts to hide issues by keeping inaccurate records/double books.

8.4 Paying wages

- a) Workers shall be paid via digital payment methods. Where this is not the case, a timebound action plan should be developed to move away from cash wage payments.
- b) Workers' pay shall always be processed on time, to a fixed schedule and never withheld.



Attempts to deliberately hide, misrepresent or falsify pay information will be treated extremely seriously. If we lose trust in a supplier, we will end our business relationship.

Supplier Guidance

c) Any identified pay errors shall be corrected as soon as possible.

d) When a worker leaves, all due wages shall be paid in a timely manner at the end of their contract.

e) At least annual internal audits are completed to assess the accuracy of payroll management systems.

8.5 Labour provider costs

Labour providers shall be compensated sufficiently to ensure that all their workers are paid at least legal minimum rates of pay and benefits. Rates shall cover legal obligations plus the inclusion of management fees and profit margin as paying less could suggest unsustainable practices.

8.6 Recruitment

Job adverts shall include pay and benefits for the role.

8.7 Terms and conditions of employment

Workers shall receive a contract/assignment terms before they start work which explains all pay and benefits. This information shall be in a language which the worker understands.

8.8 Pay slip

a) Workers shall receive a free of charge payslip, issued before or on each pay date which includes all information required by law and itemises:

- ✓ Pay rates.
- ✓ Hours worked.
- ✓ Totals gross pay.
- ✓ Lists the purpose and value of deductions.
- ✓ Totals net pay.

b) All information on payslips shall be clearly itemised so that workers can check that their pay is correct. This information shall be in a language which the worker understands, or additional guidance is provided to aid understanding.

8.9 Tax and social security

a) Tax and social security payments shall be accurately calculated, deducted from workers' pay and paid to the relevant government body in a timely manner.

b) All eligible workers shall be enrolled into a pension/retirement scheme where legally required. Contributions shall be paid in a timely manner.

c) Where workers are resistant to registering for social security, the supplier shall develop a strategy to increase uptake which may include providing training and guidance on the benefits and information on how to access social security support.

8.10 Other deductions

a) Disciplinary pay deductions shall be prohibited in contract terms and in practice. This includes deductions for lateness, absenteeism, errors and disciplinary warnings.

b) Uniforms, PPE and other essential work-related items shall be provided free of charge with no deposits taken.

c) Non-statutory pay deductions shall be:

- ✓ Legally permissible.
- ✓ For the workers own use or benefit.
- ✓ Represent good value for money.
- ✓ Clearly explained.
- ✓ Approved by workers in writing, separate to contract terms and conditions and these agreements shall be retained.



Attempts to deliberately hide, misrepresent or falsify pay information will be treated extremely seriously. If we lose trust in a supplier, we will end our business relationship.

Supplier Guidance

8.11 Accommodation

a) Any accommodation charges/deposits and food charges:

- ✓ meet legal limits
- ✓ are not excessive
- ✓ Are agreed in writing with workers

b) Taking up accommodation shall not be a condition of employment.

c) Any notice to leave accommodation shall be reasonable.

8.12 Transport

a) Any transport charges (for daily commuting to and from work) shall:

- ✓ Meet legal limits
- ✓ Not be excessive
- ✓ Be agreed in writing with individual workers

b) Using transport shall not be mandatory and can be cancelled with reasonable notice.



Additional Resources

[The Sustainable Trade Initiative](#)

The Global Compact –
[Dilemmas and case studies](#)

[BSR - Social Insurance in China](#)

Fair wear foundation –
[Wage Ladder comparison tool](#)

[Better Than Cash Alliance](#)

Ethical Trading Initiative -
[General guidance](#)

International Labour Organization –
[General guidance and instruments](#)

UK –
[Living Wage Foundation](#)

Global –
[Global Living Wage Coalition](#)

[UN Global Compact](#)



Training Resources

Living Wage Foundation -
<https://www.livingwage.org.uk/open-training>

SAI - Living Wage: Making it a reality (eLearning) –
<https://sa-intl.org/services/training/living-wage-making-it-a-reality/>

SAI - Assessing current wages training (eLearning) –
<https://sa-intl.org/services/training/assessing-current-wages/>

See training providers for costs.



Working hours are reasonable

Long working hours which do not balance the demands of work with time for rest and recovery can result in fatigue, accidents, injuries, ill health and have a detrimental impact on worker wellbeing. Productivity and accuracy can significantly decline as working hours increase, reducing efficiency and adding, often hidden, business costs.



Our commitments

High working hours are common or even systemic in some countries and industries. We recognise how challenging reducing working hours can be, especially where recruitment is difficult and worker incomes disproportionately rely on overtime premiums. We commit to working with our suppliers to understand the root cause of high working hours and agree sufficient time for sustainable corrective actions to be implemented.

If our purchasing practices are impacting your ability to manage working hours effectively, please tell us by contacting supplychainwhistleblowing@petsathome.co.uk





Attempts to deliberately hide, misrepresent or falsify working hours information will be treated extremely seriously. If we lose trust in a supplier, we will end our business relationship.

Supplier Code of Conduct



The regular working week, excluding overtime, must not exceed 48 hours. Daily working hours should not exceed 13 hours. Workers shall be provided with at least one day off in every 7-day period or, where allowed by local law, two days off in every 14-day period. All overtime shall be voluntary. The total hours worked in any 7-day period shall not exceed 60 hours, except in exceptional circumstances where the following is met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the workers' health and safety; the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

Supplier Guidance

9.1 Working time policy

A working time policy shall be developed which details all legal, Code of Conduct and collectively bargained working hour limits. This includes daily, weekly, monthly, annually, for young workers and night workers. This policy shall be shared with the workforce.

9.2 Monitoring systems

- Systems shall be in place to monitor working hours to ensure all applicable limits are not breached.
- Rest breaks during the working day shall meet at least legal requirements.

9.3 Normal working hours

- Normal working hours shall be defined within the employment contract or assignment terms.
- Basic working hours shall not exceed 48 hours per week (on average where local law permits and where collectively bargained).
- Any legal limits on daily working hours shall apply but shifts should not exceed 13 hours in any 24-hour period.

9.4 Rest periods

- Workers shall receive adequate rest breaks between shifts in line with local law.
- Systems shall be in place to ensure that workers receive adequate rest days in line with local law and this shall never be less than one day off in any 7-day period or 2 consecutive days off in any 14-day period.

9.5 Waivers

Where local law allows for working hour limit opt-out or waiver schemes, any specific requirements shall be complied with.

9.6 Voluntary overtime

- The wording of terms in the employment contract, assignment letter and employee handbook shall include a clear statement that overtime is voluntary.
- Overtime shall be agreed by workers before additional hours are booked or added to the rota.
- There shall be a system whereby workers volunteer for overtime which ensures that no one feels under pressure to accept direct overtime requests.



Attempts to deliberately hide, misrepresent or falsify working hours information will be treated extremely seriously. If we lose trust in a supplier, we will end our business relationship.

Supplier Guidance

9.7 Capacity planning

Effective planning is in place to ensure demand does not exceed capacity.

9.8 Managing high working hours

- a) Working time shall be monitored to ensure it does not breach 60 hours in any rolling 7-day period (exclusive of paid and unpaid breaks).
- b) Where working hours are consistently high and breaches are a risk, a proactive system shall be in place to check time records before overtime is worked.
- c) Working hour limits, and the importance of them, shall be explained to new recruits at induction.
- d) A working hours review shall be included as a fixed agenda point in regular management review meetings.
- e) Managers and supervisors shall have defined KPI's for managing working hours to within defined limits.
- f) The effectiveness of working hour controls shall be monitored as part of the internal audit programme.

9.9 Exceptional circumstances

a) Where it is legally permissible to work more than 60 hours per week and there is likely cause to do so, a documented procedure shall be in place for approving high working hours in exceptional circumstances which includes:

- ✓ The definition of exceptional
- ✓ The need for senior manager approval in advance
- ✓ Confirmation that risk assessments consider increased fatigue risk and any additional control measures required to ensure the health and safety of workers e.g., additional breaks, job rotation.
- ✓ Confirmation that a collective agreement is in place with the workforce to extend weekly working hours beyond 60 in exceptional circumstances. Alternatively, in the absence of organised collective bargaining, agreements shall be in place with individual workers.

b) An exceptional hours report shall be compiled which:

- ✓ Documents any breaches of working time limits.
- ✓ Identifies the root cause.
- ✓ Outlines any additional support offered to affected workers (e.g., extra breaks, job rotation, additional rest days, waiting time).
- ✓ Documents corrective actions implemented to prevent any reoccurrence.
- ✓ Explains any exceptional circumstances.

9.10 Working hour records

- a) Full and accurate working time records shall be retained. We will work to support suppliers who have working hour challenges, but we will not accept deliberate attempts to hide high working hours by keeping inaccurate records/double books.
- b) Electronic time and attendance systems (ideally biometric systems) shall be used to record working hours.
- c) Manual time records shall only be used by exception but where they are used, time in, time out and total hours shall be recorded, and the record shall be signed by individual workers to confirm accuracy.



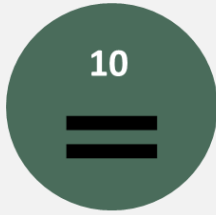
Additional Resources

Ethical Trading Initiative –
[General guidance](#)

International Labour Organization –
[General guidance and instruments](#)

[The Danish Institute for Human Rights](#)

Fair Wear Foundation –
[Working hours guide](#)



Equal Opportunities are provided

Hundreds of millions of people suffer from discrimination at work. Unaddressed discrimination in the workplace is not only an ethical (and wider societal) problem but it also has a business cost; negatively impacting employee productivity, engagement, retention, absenteeism and morale. Academic research also demonstrates that a lack of diversity in organisations, particularly in leadership and management roles, can significantly hinder commercial performance.

The COVID-19 pandemic has exacerbated existing gender imbalances by disproportionately affecting women. Across the world, more women have lost their jobs or been unable to continue working because of the increased demand for care within the home because of school closures and caring for sick relatives.



Our commitments

We believe that everybody should have the same access to good work and opportunities, irrespective of individual characteristics. We use the information obtained from audits and self-assessment questionnaires to understand the makeup of our suppliers' workforce, particularly in relation to gender. We commit to working with our suppliers to address any discriminatory practices; improve systems for identifying and addressing indirect discrimination and develop strategies for supporting the recruitment and progression of any under-represented or marginalised groups.

We recognise the importance of an inclusive culture for our colleagues and the value that diversity brings to our organisation. We publicly report on our [diversity and inclusion strategy](#)



Supplier Code of Conduct



Suppliers must commit to equal opportunities and not engage in or support any discrimination in employment, remuneration, access to training, promotion, disciplinary actions, termination or retirement on the basis of race, caste, national origin, migrant status, religion, age, disability, gender, marital status, pregnancy, parental status, sexual orientation, union membership or political affiliation.

Supplier Guidance

10.1 Policy

A documented equality/equal opportunities/anti-discrimination policy shall be established and communicated throughout the organisation.

10.2 Equal opportunities reporting

Any legally mandated equal opportunities reporting shall be disclosed as required.

10.3 Training

Training shall be conducted with all recruiting managers, line managers and workers on equality, diversity and inclusion.

10.4 Pay and promotions

- a) There shall be a clear wage grading system which ensures equal pay for equal work.
- b) Pay differentials shall be based on job role, skills and experience rather than solely on age or other characteristics (even where this may be permitted in law).
- c) Employee promotion schemes shall be simple and clearly communicated to the workforce.
- d) All job vacancies shall be advertised internally on worker noticeboards or are made available to all workers via electronic systems.

10.5 Reporting mechanism

Workers shall have a clearly communicated and effective mechanism for reporting any discriminatory practices.



Discrimination can either be direct or indirect. Direct discrimination is when people are treated differently or worse than someone else. Indirect discrimination is where a practice, policy or rule is applied to everyone equally, but it has a negative impact on some people more than others. Intersectional discrimination is when several forms of discrimination combine to leave a particular group or groups at even greater disadvantage. Anti-discrimination polices should look beyond direct discrimination and consider how the organisation's practices may be contributing to indirect discrimination.

10



Supplier Guidance

10.6 Management systems

a) Inclusion and diversity data shall be:

- ✓ Collected sensitively and recorded in accordance with data protection principles.
- ✓ Disaggregated and used to compile reports on inclusion and diversity performance.

b) A review of practices, involving analysing disaggregated data, shall be completed as part of the internal audit programme to ensure there is no direct or indirect discrimination associated with:

- Recruitment
- Training
- Promotion
- Pay and terms and conditions of employment
- Performance management
- Grievance reports and outcomes
- Redundancy
- Retirement
- Dismissal
- Flexible working
- Worker representatives

c) Where the data suggests bias, gaps or issues, action shall be taken to address the concerns.

d) Strategies shall be developed to support under-represented groups to actively participate in all levels of the organisation.

10.7 Worker representation

Diversity and inclusion shall be topics covered within the worker forum.

10.8 Celebrating diversity

Wherever possible, opportunities are taken to celebrate diversity in the workforce and raise awareness of different backgrounds and circumstances.



Additional Resources

Ethical Trading Initiative – [General guidance](#)

International Labour Organization – [General guidance and instruments](#)

Sedex – [Driving gender equality through data on global supply chains](#)

Ethical Trading Initiative – Base Code Guidance:
[Disability inclusion in the global supply chain](#)

BSR – [Making Women Workers Count](#)

PWC – [Diversity data guide](#)



Good work opportunities are provided

Workers in the informal labour market are more vulnerable to exploitation. They are more likely to experience lower pay, unsafe working conditions and will not have access to social security safety nets.

Fixed term, casual contracts and agency work can be beneficial, offering flexibility which allows workers to balance the demands of work with other commitments. However, where work is inconsistent or provided at short notice, this can cause significant difficulties and financial hardship. For businesses, overuse of temporary and agency workers adds recruitment and training costs; inexperienced workers can be less productive and are more likely to make mistakes.



Our commitment

We believe that wherever possible workers should be afforded the security of guaranteed work, income and a fixed working pattern. Only where there is a genuine need for a temporary or changeable workforce (because of seasonality, unpredictability of orders, unplanned events, short term labour shortages or similar justification) should temporary or casual work be provided over regular, permanent employment.

We use audit data and self-assessment information to monitor the utilisation of temporary, casual and agency workers. Where issues are found, we commit to work with suppliers to understand challenges and support the development of action plans to improve the quality of employment opportunities and conditions for casual workers.



11



Supplier Code of Conduct



Suppliers must provide all workers, whether permanent, temporary or casual, with a written employment contract. Temporary labour contracts and labour-only contracting must only be used for short-term labour demands and not used to avoid meeting labour and social security obligations afforded to permanent employees or leave workers in an insecure employment relationship. Contracted working hours should reflect established working patterns and zero-hour contracts avoided unless they offer genuine flexibility for workers.

Supplier Guidance

11.1 Terms and conditions of employment

a) All new recruits shall be provided with key terms and conditions of employment before they commence work. This shall include:

- ✓ Job title and job description.
- ✓ Place of work.
- ✓ Date employment begins.
- ✓ Pay and any benefits.
- ✓ Working hours and shift patterns.
- ✓ Any probationary period.
- ✓ Any other legally required information.

b) The information shall be provided in a language which the worker understands.

c) Workers shall sign employment contracts and a copy shall be retained securely on their personnel file and another issued to the worker. Where there is a legal requirement, this shall also be registered with the local labour bureau.

d) Information within contracts shall be regularly reviewed to ensure they remain up to date with changes in law and practice.

e) Contracted working hours should reflect established working patterns.

f) Updated contracts shall be issued if there is a material change or as required by local law.

g) Key employment terms and rules are explained to new starters during the site induction programme.

11.2 Agency worker assignment details

In addition to generic employment contract terms, agency workers shall also receive a detailed assignment letter which includes all key terms and conditions of engagement required by law and including (but not limited to):

- ✓ Start date.
- ✓ Basic and overtime pay rates and when they apply.
- ✓ Any shift premiums.
- ✓ Holiday entitlement and pay.
- ✓ Break entitlements and if these are paid.
- ✓ Shift patterns for site.
- ✓ Brief job description.
- ✓ Any key health & safety risks and occupational health screening required.
- ✓ Any requirement for PPE and confirmation that this is provided free of charge.
- ✓ Guaranteed shift duration (for booked shifts).
- ✓ Access to shared facilities.
- ✓ Any changes to terms and conditions after a defined qualifying period.



Supplier Guidance

11.3 Temporary labour utilisation

- a) Any legal restrictions on the use of temporary, agency and casual workers is complied with.
- b) Agency, casual and temporary workers shall never be fired and rehired or reassigned to avoid paying legally mandated employment benefits.
- c) Agency labour is used responsibly, either as a recruitment tool in which workers are transferred to permanent roles as soon as possible (and if workers so wish) or to manage seasonal or unexpected short-term peaks.
- d) Where there is an over-reliance on temporary agency workers or casual workers, an action plan shall be developed to address this. Where appropriate, agency labour utilisation is tracked and analysed.
- e) The use of zero-hour and flexible working arrangements are avoided unless there is a genuine requirement for a temporary or changeable workforce (because of the unpredictability of orders or unplanned events) and only where this is permitted by local law.

- f) Agency/casual workers shall be given as much notice as possible of the availability of work and working hours.
- g) Zero-hour or flexible contracts shall offer workers the same level of flexibility as the employer. There shall be no requirement for workers to accept all work offered.
- h) Agency/casual workers shall be given appropriate compensation for any booked and attended shift where there is subsequently no work available.

11.4 Apprentices

- a) The number of apprentices/trainees does not exceed any legal limits.
- b) Employment terms and conditions for apprentices/trainees meets all legal requirements.
- c) Apprenticeship training programmes meet any legal requirements, are well structured and have clear learning objectives which impart vocational skills.



Additional Resources

Ethical Trading Initiative –
[General guidance](#)

International Labour Organization –
[General guidance and instruments](#)

International Labour Organization –
[Business and Security of Employment](#)

ILOSTAT –
[Global statistics on the informal economy](#)



Workers are treated with respect and dignity

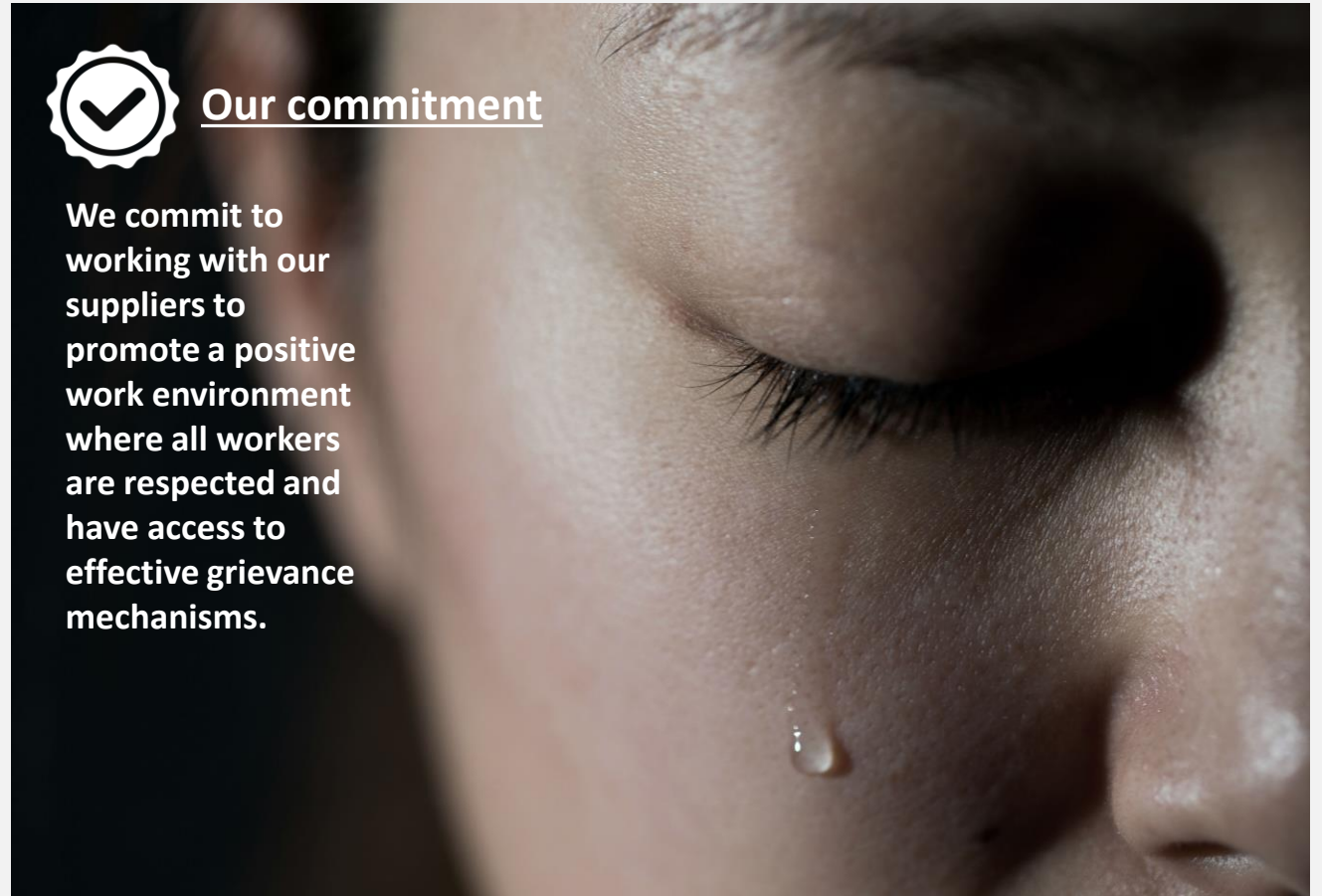
Everyone has the right to feel safe and respected in their workplace. Women are disproportionately impacted by gender-based violence which includes sexual harassment, assault, intimidation and humiliation. Unfortunately, too often such behaviour goes underreported, and workers have no access to remedy.

Working to ensure a positive work environment is good for business. It means better productivity, reduced absenteeism and turnover of staff. It helps maintain a good business reputation which supports recruitment.



Our commitment

We commit to working with our suppliers to promote a positive work environment where all workers are respected and have access to effective grievance mechanisms.





Supplier Code of Conduct



Suppliers must treat all workers with respect and dignity and commit to a workplace free of harassment and violence by prohibiting all forms of physical, sexual, psychological and verbal abuse, coercion, harassment or other forms of intimidation.

Supplier Guidance

12.1 Zero tolerance policy

- a) A documented policy shall be in place confirming a zero-tolerance approach to bullying, harassment, violence and abuse. The policy shall explain unreasonable behaviour and should be communicated and explained to workers at the site induction.
- b) Appropriate action shall be taken if any unreasonable behaviour is reported.

12.2 Discipline

- a) Rules and performance standards shall be documented and clearly communicated to all workers.
- b) A comprehensive disciplinary procedure shall be shared with workers which clearly explains:
 - ✓ The stages of the disciplinary process and what action may be taken (including examples of gross misconduct which are considered grounds for dismissal).
 - ✓ Confirmation that employees have the right to be accompanied at formal disciplinary hearings.
 - ✓ A right to appeal against any formal decision made.
 - ✓ A commitment to confidentiality.
- c) Workers shall be paid during periods of suspension whilst disciplinary investigations are completed.

- d) Managers and worker representatives shall be trained to handle disciplinary issues effectively.
- e) A full written record of disciplinary cases shall be retained.
- f) Disciplinary frequencies and causes shall be analysed to identify trends which can be acted on.

12.3 Consultation

- a) Worker representatives shall represent the makeup of the workforce and include female workers.
- b) Worker representatives shall be consulted regarding changes to policies, procedures and rules.
- c) A sexual harassment committee shall be in place where required by law.



12.4 People Management:

- a) New supervisors and line managers shall be provided with formal people management/leadership training.
- b) The performance of supervisors and line managers shall be monitored to include feedback from their teams e.g., anonymous worker survey or 360 feedback.
- c) Leaver interviews/questionnaires shall be used to understand why colleagues leave the business and support an improvement of working conditions/worker engagement.
- d) A strategy shall be developed to promote wellbeing and positive mental health in the workplace.
- e) Procedures shall be in place for welcoming new starters and agency workers to the business and supporting them during their first few weeks e.g., buddy scheme.

Supplier Guidance

12.5 Security procedures

- a) Where alcohol and drug-testing is deemed necessary, there shall be a clear policy in place which is explained to workers upon joining, tests are conducted fairly without discrimination and conducted sensitively.
- b) Checks shall be in place to ensure that all security guards hold valid licences (where this is a legal requirement) and the performance/conduct of security guards is monitored.
- c) There shall be no physical body searches. Where worker property searches are deemed necessary:
 - ✓ There is a clear policy in place which is explained to workers upon joining.
 - ✓ They are conducted fairly without discrimination.
 - ✓ Conducted sensitively by the same gender where appropriate.

12.6 Safe Transport

Where workers are particularly vulnerable travelling to and from work, the business shall take steps to arrange safe transport or provide appropriate safety advice.



Additional Resources

Ethical Trading Initiative –
[General guidance](#)

ILO –
[Eliminating Violence and Harassment in the World of Work](#)

ILO –
[Gender-based violence in the world of work](#)

ILO / UN Women –
[Addressing violence and harassment against women in the world of work](#)



Effective grievance mechanisms are in place

We want our suppliers to promote positive and open dialogue with their workforce, where issues can be resolved informally. However, where informal mechanisms are ineffective or inappropriate given the nature of the dispute, formal procedures should be in place which allow for whistleblowing disclosures and worker grievances to be reported in confidence, investigated thoroughly and resolved appropriately and consistently. This can help prevent escalation of issues to external parties and protect the reputation of the business.

SUSTAINABLE DEVELOPMENT GOALS



Our commitments

We have a documented procedure for managing whistleblowing reports and commit to investigate concerns sensitively, confidentially and whenever it is appropriate, in full cooperation with our supplier. Although, we will not tolerate the victimisation of anyone who raises genuine concerns about wrongdoing, even if it turns out that these concerns were misplaced, so protecting the anonymity and safety of the whistleblower is prioritised during any investigation.



13



Supplier Code of Conduct



Suppliers must provide an effective and transparent grievance mechanism for workers and communities to raise concerns. Processes shall be in place to ensure that there is no retaliation or unfair treatment of reporters who speak up in good faith. Mechanisms must be in place to allow for anonymous reports to be raised. Manufacturers of Pets at Home own label products must display a copy of our whistleblower poster so this is accessible to their workforce.

Supplier Guidance



13.1 Grievance:

- a) A documented grievance procedure shall be available to all workers and there shall be a mechanism for anonymous reporting.
- b) The grievance procedure shall include:
- ✓ Time frames for each stage of the grievance process.
 - ✓ Confirmation that employees have the right to be accompanied at formal grievance meetings.
 - ✓ A right to appeal against any formal decision made.
 - ✓ A commitment to confidentiality, if requested.

- c) Managers and worker representatives shall be trained to handle grievances effectively.
- d) Workers shall receive training to help them understand the grievance policy/procedure.
- e) The grievance procedures (policy and practice) shall be assessed against the UNGP's (United Nations Guiding Principles of Business & Human Rights) effectiveness criteria for operational-level grievance mechanisms.

Page 31-35

https://www.ohchr.org/Documents/Publication/GuidingPrinciplesBusinessHR_EN.pdf

- f) There shall be an effective mechanism for external stakeholders to raise a grievance with the business e.g., business neighbours or individuals in the local community.
- g) A full written record of grievance cases shall be retained.
- h) Grievance frequencies and causes shall be analysed to identify trends which can be acted on.



Additional Resources

[Guiding Principles on Business and Human Rights](#)

[ILO Factsheet – Grievance handling](#)

13



Supplier Guidance

13.2 Whistleblowing

- a) A documented whistleblowing policy and supporting procedure shall be developed and made available to all workers.
- b) The whistleblowing policy shall confirm:
- ✓ Who can be approached by workers that want to raise a disclosure.
 - ✓ There will be no detriment to an individual who raises a disclosure in good faith.
 - ✓ The confidentiality of the whistleblower will be maintained (where permitted by law).
 - ✓ The mechanism for workers to raise a disclosure anonymously.
- c) Workers shall receive training to help them understand how disclosures should be raised and how the business will act upon them.
- d) Managers shall be trained on how to deal with disclosures.
- e) A full written record of disclosure cases shall be retained.

13.3 Consultation

Where possible (where confidentiality can be maintained) the outcome of whistleblowing disclosures and grievance cases shall be discussed with worker representatives.



It is important that the people in our value chain have a mechanism to reach out to us. Manufacturers of Pets at Home own label products must display a colour copy of our whistleblower poster, so this is accessible to their workforce.

Whistleblowing

If you see wrongdoing at work and are not able to report this within your workplace, please contact Pets at Home.

FORCED LABOUR

ILLEGAL ACTS

BULLYING & HARASSMENT

BRIBERY & CORRUPTION

DISCRIMINATION

HEALTH & SAFETY

ENVIRONMENTAL DAMAGE

PRODUCT SAFETY

Contact us in confidence
Email: supplychainwhistleblowing@petsathome.co.uk

We will ensure your contact details are kept confidential and you can remain anonymous if you wish.

pets at home Group

pets at home

the groom room

Vets4Pets

Companion Care Vets



If you have your own whistleblowing line or have been asked to display other customer whistleblowing posters, we recommend displaying the information so the route of escalation is clear and signposts workers towards internal support ahead of external whistleblowing contacts. We also strongly recommend explaining your whistleblowing policy and routes of escalation to new recruits at induction.

[Access the Pets at Home Supply Chain Whistleblowing Poster and translations](#)



Responsible recruitment practices are followed

Workers in the informal economy, migrant workers and temporary workers are all particularly vulnerable to exploitation. Where recruitment is outsourced, and especially when this occurs in another country, the risk of exploitation is even higher as it is more difficult to control the process.

SUSTAINABLE DEVELOPMENT GOALS



Our commitments

We use audit and self-assessment data to understand which suppliers are using migrant workers and temporary agency workers. We commit to work with our suppliers to better understand their labour sourcing arrangements and ensure strong management systems are in place to prevent worker exploitation. Where recruitment fees are charged, we will work with suppliers to remove them.



Supplier Code of Conduct



Where agencies are used for recruitment or the supply of temporary labour, suppliers must ensure that they fully understand the entire recruitment process including the use of labour recruiters and intermediaries. Workers must not be charged any recruitment or employment fees at any stage of the recruitment process. Migrant workers hired from another region or country must receive their employment contract prior to departing their home region or home country of origin. Their contract must not be changed in any form on arrival to their destination of employment, unless these changes are made to meet local law and provide equal or better terms. Suppliers must regularly audit employment agencies from whom they obtain workers to ensure full compliance to legal and ethical standards.

Supplier Guidance

14.1 Labour supply chain mapping

Suppliers shall map their labour supply chain, so they fully understand the entire recruitment process including the use of labour recruiters, intermediaries and the recruitment methods used by these organisations.

14.2 No recruitment fees.

a) No recruitment fees shall be charged to workers, even where this is legally permitted. This includes direct charges and charges made by recruitment agents and intermediaries. Recruitment fees includes:

- Payments for the cost of recruitment services.
- Related costs of recruitment, referral and placement within or across national borders, such as but not limited to:
 - Medical costs
 - Insurance costs
 - Costs for skills and qualification tests
 - Costs for training and orientation
 - Equipment costs
 - Travel and lodging costs
 - Administrative costs
 - Visa applications

b) Written agreements shall be in place with recruitment agents to confirm that all recruitment costs will be borne by the hirer. These costs shall be itemised and fully understood.

c) Checks shall be completed during onboarding (and for individuals renewing visas) to ensure no workers have been charged any recruitment fees.

d) Arrangements should be in place to refund recruitment fees where they are identified.

14.3 Migrant workers

a) Information provided in job advertisements shall be accurate and comprehensive.

b) Contracts shall be approved by the hiring company and shall be in a language which the workers understand.

c) Contracts shall not be amended on arrival in the host country, unless required by local law or to provide equal or better terms. In this case, the changes shall be clearly explained to workers.



Supplier Guidance

14.4 Service Level Agreements

A signed service level agreement shall be in place with temporary labour providers and labour recruitment agents which includes a commitment to meeting legal and ethical standards including but not limited to:

- Commitment to no subcontracting of labour sourcing or intermediaries without prior agreement.
- Agreement to notify the outcome of any audits/inspections by enforcement bodies.
- Maintenance of any legally required business licences.
- Requirement to complete adequate checks to identify potential victims of modern slavery and human trafficking.
- Arrangements for the access of worker information for audit purposes.
- Requirement for zero worker paid recruitment fees.
- Arrangements for worker transport, vehicle standards and driver licencing.
- Minimum standards for any worker housing.
- Minimum age of recruitment.

Additionally for temporary labour agencies:

- Charge rates and pay rates (including basic pay, overtime premiums, any paid breaks, additional payments, contractual holiday entitlement).
- List of shared facilities available.
- Arrangements for issuing PPE free of charge.
- Arrangements for providing occupational health checks.
- Arrangements for delivering the site induction and confirmation that this is paid.
- Arrangements for issuing an assignment letter and its expected content.
- Guaranteed minimum pay for each booked and attended shift.
- Commitment that any worker transport charges shall be reasonable.
- Commitment that any worker accommodation charges shall be reasonable.
- Commitment to meet Pets at Home Supplier Code of Conduct & legal working hour limits.
- Arrangements for the notification of any young or vulnerable workers assigned to site.
- Requirement to complete adequate entitlement to work checks.



Additional Resources

Institute for Human Rights and Business –
[The Employer Pays Principle](#)

Stronger Together –
[Interview/listening group templates](#)





Supplier Guidance

14.5 Audits

- a) Audits shall be completed before the services of a new labour provider or labour recruiter is engaged and at least annually thereafter.
- b) Ethical assessments shall be completed by a competent person or 3rd party with the relevant experience and knowledge.
- c) Ethical assessments shall include worker listening groups and a document review.
- d) The audit scope shall cover key requirements of local law and the Pets at Home Supplier Code of Conduct (or comparable code).
- e) Where international migrant workers are recruited, relevant elements of the audit shall be completed in the host country to adequately assess the recruitment process.



Training Resources

IOM E-Campus – [Various free eLearning courses](#)

Responsible Recruitment Toolkit –
[Eliminating Worker-paid recruitment fees](#) –
 see course provider for costs

14.6 Supply of temporary labour

- a) Temporary employment agencies must directly manage the recruitment and onboarding of temporary workers supplied by them.
- b) An ethical assessment is completed before any subcontractors or intermediaries are used to supply labour and adequate checks are completed each time a new worker is introduced. Any such subcontracting shall be approved by the hiring supplier in advance.
- c) A list of all workers shall be provided to the hiring company every day or when any new worker is provided on assignment.

14.7 Permanent onsite contractors

Suppliers shall regularly audit permanent onsite contractors (e.g., security, engineering, catering, hygiene) to ensure full compliance to legal requirements and Pets at Home Supplier Code of Conduct (or comparable code).





Entitlement to work is verified

Hiring workers who are not legally entitled to work may result in prosecution, significant fines and reputational damage to a business.

However, there is also a greater risk of these individuals being exploited or trafficked for work. It is therefore vital that adequate procedures are in place to check the validity of right to work documents and ensure they are genuine and belong to the individual being hired.



Our commitment

We commit to supporting our suppliers to develop robust processes for checking right to work documentation

Supplier Code of Conduct



Suppliers must only employ workers with a legal entitlement to work. All workers, including temporary and employment agency workers, must have their legal right to work validated by reviewing original documentation before they are allowed to commence work. Original documents must be returned to workers.



Additional Resources

UK Only –

[Government Right to Work Guidance](#)

Supplier Guidance

15.1 Entitlement to work checks:

- The procedure for checking entitlement to work shall be documented. Colleagues responsible for checking identification shall be trained and this training shall include techniques for identifying fraudulent documents.
- Original identification documents (approved by local/national government) shall be reviewed before an individual starts work, to confirm that only those with a legal entitlement to work are employed.
- Where labour providers conduct entitlement to work checks, the adequacy of these checks shall be verified by the supplier.
- Travel and identification documents shall be returned to workers and where workers stay in business-provided accommodation, suitable, instant access, secure storage shall be provided for document safekeeping.

- An effective tracking system shall be in place which prompts the revalidation of time-limited entitlement to work.
- If there is any cause to believe that pre-employment/re-validation entitlement to work checks have previously been inadequate, a file audit shall be completed to ensure that all workers have copy documentation on file verifying their entitlement to work.
- Wherever possible and where there is a high risk of fraudulent documents being presented, identity document validity technology shall be used.
- The effectiveness of systems for checking entitlement to work shall be tested during the organisation's internal audit programme.



16

Business provided accommodation is safe and meets acceptable standards

Decent housing is integral to migrant workers' wellbeing. If suitable housing is not available in the local community and employers provide accommodation, this must be safe and enable workers to have a decent standard of living. Good accommodation can be a differentiating factor in attracting and retaining workers.

SUSTAINABLE DEVELOPMENT GOALS



Our commitment

We use audit and self-assessment data to understand which of our suppliers are providing worker housing and are committed to ensuring this accommodation offers workers a decent standard of living, at a reasonable price.





Supplier Code of Conduct



Where provided, supplier accommodation must be maintained in a safe and hygienic condition, meeting acceptable housing standards. Accommodation should be kept secure for safety and wellbeing but not unduly restrict workers' freedom of movement. When a worker's contract is terminated, the worker must be entitled to a reasonable period of time to vacate the premises, in accordance with national law and custom. Where migrant workers relocate for work and no supplier provided accommodation is available, the supplier must provide guidance and ongoing support to ensure workers find and remain in suitable and safe housing.

Supplier Guidance

16.1 Legal requirements

All legally required standards for accommodation have been identified and are met. This includes any required planning consent, licences, structural integrity, fire safety arrangements, health & safety standards, occupancy rules and facility standards.

16.2 Construction and location

- a) Accommodation is durably constructed considering localised natural hazards e.g., earthquake, hurricane, flood.
- b) Accommodation is located to avoid exposure to:
- Air pollution
 - Sewage or other waste
 - Surface water run-off
 - Heavy vehicle traffic
- c) Multiple accommodation units are adequately spaced apart.

16.3 Minimum accommodation standards

Accommodation standards, as a minimum, shall comply with local law and the recommendations outlined in [ILO Workers' Housing Recommendation, 1961 \(No. 115\)](#)¹ (whichever offers the highest standards for workers):

- ✓ A separate bed for each worker.
- ✓ Adequate headroom, providing full and free movement, of not less than 203 centimetres.
- ✓ The minimum inside dimensions of a sleeping space should be at least 198 centimetres by 80 centimetres.

- ✓ Beds should not be arranged in tiers of more than two.
- ✓ Bedding materials should be reasonably comfortable.
- ✓ Bedding and bedframe materials should be designed to deter vermin.
- ✓ Separate accommodation of the sexes.
- ✓ Adequate natural light during the daytime and adequate artificial light.
- ✓ A reading lamp for each bed.
- ✓ Adequate ventilation to ensure sufficient movement of air in all conditions of weather and climate.
- ✓ Heating where appropriate.
- ✓ Adequate supply of safe potable water.
- ✓ Adequate sanitary facilities which should include a minimum of one toilet, one wash basin and one tub or shower for every six persons. They should be provided at a convenient location which prevents nuisances. Sanitary facilities provided should meet minimum standards of health and hygiene. They should also provide reasonable standards of comfort, including hot and cold fresh running water. There should be separate sanitary facilities provided for men and for women. Sanitary facilities should have ventilation to the open air, independently of any other part of the accommodation. Soap and hygienic paper should be adequately stocked.
- ✓ Adequate drainage.
- ✓ Adequate furniture for each worker to secure their belongings, such as a ventilated clothes locker which can be locked by the occupant to ensure privacy.
- ✓ Common dining rooms, canteens or mess rooms, located away from the sleeping areas.



Supplier Guidance

- ✓ Appropriately situated and furnished laundry facilities.
- ✓ Reasonable access to telephone or other modes of communications, with any charges for the use of these services being reasonable in amount.
- ✓ Rest and recreation rooms and health facilities, where not otherwise available in the community.
- ✓ In workers' sleeping rooms the floor area should not be less than 7.5 square metres in rooms accommodating two persons; 11.5 square metres in rooms accommodating three persons; or 14.5 square metres in rooms accommodating four persons. If a room accommodates more than four persons, the floor area should be at least 3.6 square metres per person. Rooms should indicate the permitted number of occupants.
- ✓ As far as practicable, sleeping rooms should be arranged so that shifts are separated and that no workers working during the day share a room with workers on night shifts.

16.4 Health, safety and wellbeing:

- a) Adequate pest control measures shall be in place to keep accommodation free of vermin and protect workers from mosquito-borne diseases.
- b) Adequate measures shall be in place to prevent the spread of communicable diseases including providing separate accommodation for sick occupants and ensuring access to suitable first aid, health care and emergency support.
- c) Hygienic and adequate provisions shall be provided for the preparation and storage of food. Where a catering service is provided, catering operatives shall hold any relevant licences and have appropriate food safety training.

d) A fire risk assessment shall be completed to ensure that:

- ✓ Fire risks are identified and that preventative measures are adequate. This includes risks from radiators and heaters,
- ✓ Fire detection and warning systems are sufficient and appropriately maintained
- ✓ Adequate fire-fighting equipment is provided and appropriately maintained
- ✓ There are sufficient and suitable escape routes adequately signed and maintained.
- ✓ Adequate emergency lighting is installed and appropriately maintained
- ✓ Adequate fire safety training is in place for all residents.
- ✓ Accommodation fire marshals are designated and trained.
- ✓ Emergency evacuation procedures are documented and tested regularly. The frequency of drills is in line with risk assessment and any local law requirement including dark hours drills. Individuals requiring additional support (e.g., young or disabled workers) are identified and a support plan developed.

16.5 Accommodation information:

Information, rules and expectations for maintaining accommodation standards shall be confirmed to workers in writing.

16.6 Restriction of movement

Accommodation should be kept secure for safety and wellbeing but not unduly restrict workers' freedom of movement.

16



Supplier Guidance

16.7 Accommodation Inspections

Accommodation shall be inspected frequently to ensure that it is clean, habitable and maintained in a good state of repair. The results of inspections shall be recorded.

16.8 Reporting issues

There shall be a clear mechanism for workers to report any breakages or concerns relating to accommodation standards. Any issues raised shall be addressed quickly.

16.9 Vacating accommodation

When a worker's contract is terminated, the worker shall be entitled to a reasonable period to vacate the premises, in accordance with national law and custom.

16.10 Migrant workers

Where migrant workers relocate for work and no supplier provided accommodation is available, the supplier must provide guidance and ongoing support to ensure workers find and remain in suitable and safe housing.



Additional Resources

IFC and the EBRD –
[Workers' accommodation: processes and standards](#)

UK Government –
[Fire Safety Risk Assessment – Sleeping Accommodation](#)

ILO –
[Workers' housing guide](#)

FPC Guidance on provision of temporary accommodation units for workers in the UK –
[Self-help checklist](#)

ILO - Home truths:
[Access to adequate housing for migrant workers in the ASEAN region](#)



Subcontracting and homeworking is controlled

To ensure that human rights are safeguarded, and the environment is protected, we must know where our products are made.

The ILO estimates that there were about 260 million home-based workers in the world in 2019, representing 7.9% of global employment.¹ Homeworking can provide positive employment opportunities for people (many of them woman) who need flexibility to balance the demands of work and family life. However, employment agreements are often informal and a lack of visibility of standards, makes homeworkers particularly vulnerable.

The income of many homeworkers does not meet legal minimums, they often don't benefit from the same level of social protection as other workers and are rarely afforded the security of regular employment.

¹ [Source](#)



Our commitment

Subcontracting – We commit to working with our suppliers to support the approval of contingency sources where necessary.

Homeworking – We recognise the importance of homeworking to individual family incomes, whilst providing valuable skills and flexibility for supply chains. We support the use of homeworking in our supply chain, and we are committed to protecting and promoting the livelihoods and working conditions for homeworkers. We will work with our suppliers to identify homeworking in our supply chain, understand working conditions for homeworkers and work to progressively improve standards where they fall short of our expectations. Where appropriate, we will collaborate with other brands and NGOs to influence sustainable improvements for homeworkers.

SUSTAINABLE DEVELOPMENT GOALS





ZERO
TOLERANCE

Unauthorised subcontracting represents a critical breach of our supplier terms and conditions

Supplier Code of Conduct



There must be no homeworking, subcontracting or external processing of production or part of production unless previously agreed in advance by Pets at Home Technical and Responsible Sourcing Teams. Systems shall be in place to ensure that any subcontractors and homeworker intermediaries fully comply with legal and ethical standards.

Supplier Guidance

17.1 Subcontracting

a) Production or part of production should never be subcontracted without prior disclosure and approval from Pets at Home Technical and Responsible Sourcing Teams.

b) Subcontractors must be issued with a copy of our Supplier Code of Conduct and Responsible Sourcing Handbook and agree to work towards full compliance.

c) Where the full production process is subcontracted, or production of a Pets at Home branded component is subcontracted or processed offsite, the subcontractor shall comply with Pets at Home audit requirements (detailed in page 11). Where only part of production is subcontracted (unbranded components), suppliers shall have systems in place to monitor subcontractor standards.

d) Ethical assessments of subcontractors shall:

- ✓ Be completed before subcontractors are engaged and at least annually thereafter.
- ✓ Be conducted on the subcontractor's employment site (or virtual where this is not possible) by a competent person (by experience and training) or a suitably qualified 3rd party.
- ✓ Include an assessment of compliance to this code of conduct or comparable code.
- ✓ Be disclosed to Pets at Home upon request.
- ✓ Be supported with an action plan where standards do not meet expectations. Remedial actions shall be closed out within a suitable and reasonable timeframe. For critical findings, this must be ahead of production approval.



Additional Resources

Ethical Trading Initiative – [Homeworker resources](#)

International Labour Organization – [Working from home: From invisibility to decent work](#)

Homeworkers Worldwide – [various resources](#)



Unauthorised subcontracting represents a critical breach of our supplier terms and conditions



Supplier Guidance

17.2 Homeworking

- a) Suppliers shall develop a policy which confirms an acceptance of homeworking and commits to continuous improvement of working conditions for homeworkers. This policy shall be communicated within the organisation and to suppliers.
- b) Suppliers shall identify, and disclose to Pets at Home, the use of homeworkers within their own operations, by their subcontractors and suppliers.

c) Where homeworkers are engaged, suppliers shall ensure that:

- ✓ The homeworking operation is mapped to understand all parties and intermediaries involved in the recruitment of, and management of homeworkers. Any intermediaries are operating in compliance with local law and that a contractual agreement exists between the engaging supplier and homeworker intermediary which defines minimum standards and expectations in relation to working conditions for homeworkers.
- ✓ A complete register of homeworkers (including all homeworking members of the same household) is maintained. This should include at a minimum: the workers name, gender, age, verification of age, address and contact information.
- ✓ Adequate records are maintained to demonstrate work allocated and pay received. Additionally, homeworkers should be encouraged to keep their own records if not already doing so. Time and motion studies should support piece rate pay and wages shall meet at least the legal minimum or appropriate prevailing industry standards, whichever is higher. Pay rates should be consistent and reflect the principle of equal pay for equal work.
- ✓ Adequate health & safety controls shall be in place and all required safety equipment provided free of charge.
- ✓ Homeworkers shall receive clear information about their rights and entitlements including access to social security schemes or equivalent private provisions.
- ✓ Homeworkers shall have access to an effective grievance mechanism.

d) Assessments of homeworking conditions shall:

- ✓ Be completed before homeworkers are engaged and at least annually thereafter.
- ✓ Be conducted by a competent person (by experience and training) or a suitably qualified 3rd party.
- ✓ Include private homeworker listening groups.
- ✓ Be supported with an action plan where standards do not meet expectations. Remedial actions shall be closed out within a suitable and reasonable timeframe. For critical findings, this must be ahead of approval to commence work.
- ✓ Be made available to Pets at Home upon request.

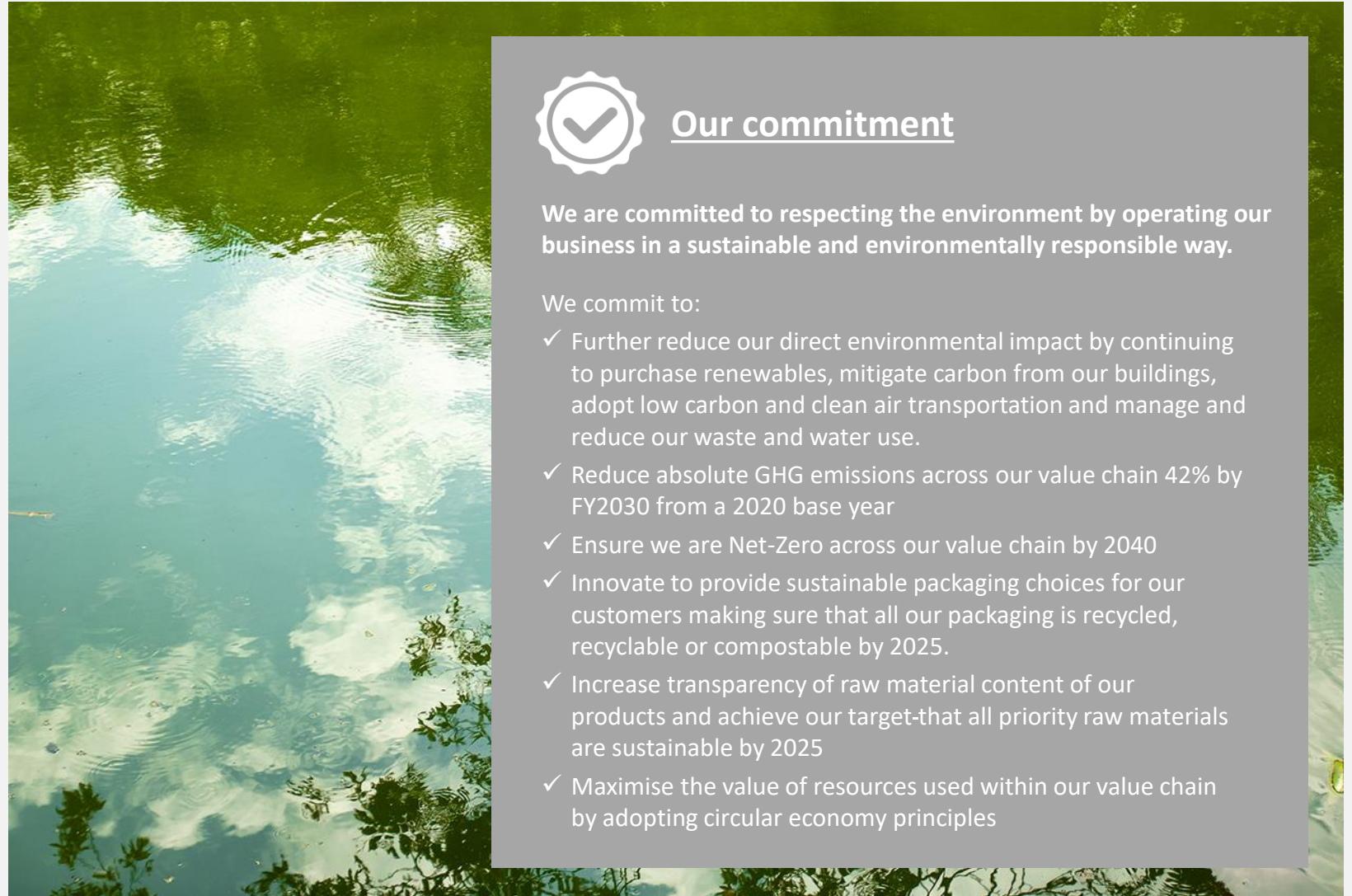


18

The environment is protected

Our world faces an environmental crisis. The climate emergency, rising biodiversity loss, and the ongoing degradation of our natural environment are negatively impacting the sustainability of our planet's ecosystem.

SUSTAINABLE DEVELOPMENT GOALS



Our commitment

We are committed to respecting the environment by operating our business in a sustainable and environmentally responsible way.

We commit to:

- ✓ Further reduce our direct environmental impact by continuing to purchase renewables, mitigate carbon from our buildings, adopt low carbon and clean air transportation and manage and reduce our waste and water use.
- ✓ Reduce absolute GHG emissions across our value chain 42% by FY2030 from a 2020 base year
- ✓ Ensure we are Net-Zero across our value chain by 2040
- ✓ Innovate to provide sustainable packaging choices for our customers making sure that all our packaging is recycled, recyclable or compostable by 2025.
- ✓ Increase transparency of raw material content of our products and achieve our target-that all priority raw materials are sustainable by 2025
- ✓ Maximise the value of resources used within our value chain by adopting circular economy principles



Supplier Code of Conduct



Suppliers must meet all local and national environmental legislation including holding all relevant permits for the facility, use of resources, disposal of waste and release of emissions. Effective management systems shall be in place to identify and control the environmental impacts of business activities, products and services whilst continually improving environmental performance. Energy and water should be used efficiently and responsibility (utilising low carbon and/or renewable energy sources where possible). Waste should be minimised and recycled where possible. Chemical use should be carefully controlled, and substances handled, stored and disposed of safely. Suppliers shall develop or participate in programmes which support the reduction of greenhouse gas emissions as close to zero as possible. Suppliers are strongly encouraged to support initiatives which seek to protect biodiversity.

See our full [Environmental Policy](#)

Supplier Guidance

18.1 Legal compliance

Suppliers must meet all local and national environmental legislation including holding all relevant permits for the facility, use of resources, disposal of waste and release of emissions.

18.2 Management Systems

Adequate policies, procedures and governance shall be in place to effectively manage environmental compliance and performance:

- a) A senior management representative shall be accountable for environmental compliance and performance
- b) An environmental policy shall be developed to explain expectations, arrangements for managing environmental compliance and a business commitment to continuous improvement. This policy shall be communicated to the workforce and to suppliers.
- c) A competent person (by training and experience) shall be responsible for day-to-day environmental management.
- d) An environmental aspects and impacts assessment of all business operations shall be undertaken and regularly reviewed. Targets shall be developed for continuous improvement.

- e) Management meetings shall be conducted regularly to review environmental performance.
- f) The business shall prioritise and designate adequate funds to the effective mitigation of environmental risks and to support continuous improvement.
- g) A comprehensive training programme shall be in place with relevant workers to manage pollution and other environmental risks.
- h) Suppliers shall have in place agreements with their suppliers to mandate environmental compliance and promote continuous improvement. Systems shall be in place to monitor high risk suppliers.





Supplier Guidance

18.3 Water

- a) A programme shall be in place to measure water use and ensure resources are used efficiently and responsibly.
- b) Contaminated water shall not be discharged into the local environment. Any applicable trade effluent consent limits shall be complied with.
- c) Particularly in areas of water stress, suppliers must ensure that their operations do not impact the supply of water to local communities.

18.4 Energy

A programme shall be in place to measure energy use and ensure resources are used efficiently and responsibly. Low carbon and/or renewable energy sources shall be used where possible.

18.5 Chemicals

- a) Chemical use shall be carefully controlled, and substances handled, stored, transported and disposed of safely.
- b) Adequate provisions shall be provided to manage and contain chemical or oil spills to prevent environmental exposure.
- c) UK REACH Regulations must be complied with in the manufacture of all products.

18.6 Emissions to air

Any emissions to air shall be controlled, monitored and minimised.

18.7 Waste

Suppliers shall ensure that waste is minimised by prevention, reduction, recycling and recovery. Waste shall be handled, stored, transported and disposed of safely and responsibly by appropriately licenced contractors.

18.8 Enforcement activity

Suppliers shall advise Pets at Home of any environmental enforcement action by local/ national authorities and shall have similar notification requirements in place with their suppliers.

18.9 Environmental nuisance

Action shall be taken to limit the impact of business operations on local communities. This may include:

- a) The prevention of odour pollution (or minimised when prevention is not practicable).
- b) Noise shall be controlled and minimised, particularly at night.
- c) Site traffic shall be managed and directed to avoid residential areas wherever possible.



18.10 Biodiversity

Suppliers shall assess the impact of their operations and sourcing on local ecosystems and biodiversity. Action shall be taken to minimise any harm and positively contribute to the conservation, restoration and protection of natural habitats for threatened and endangered species wherever possible.

18.11 Carbon reduction

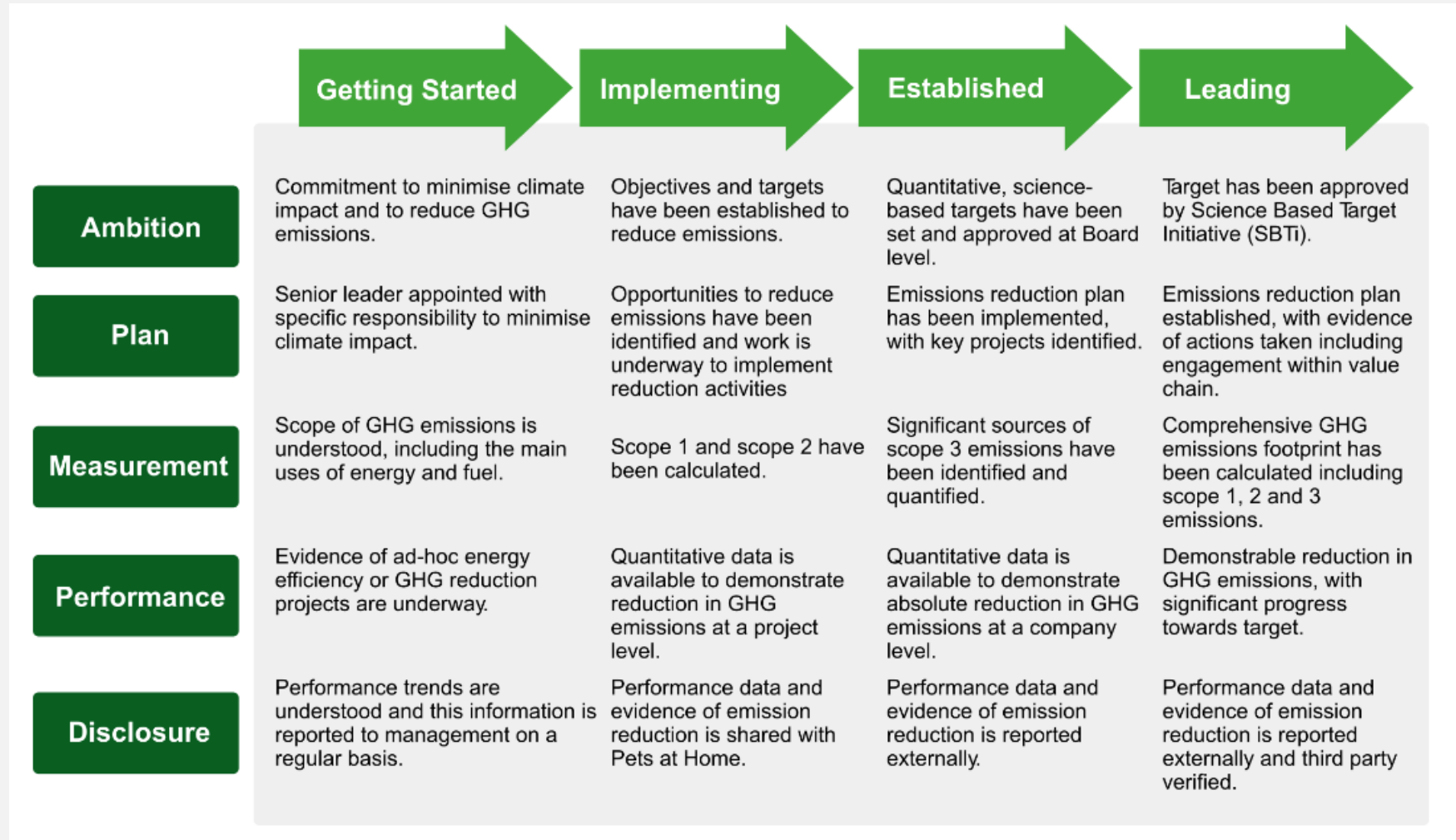
Suppliers shall develop an established carbon reduction programme. This shall ensure that:

- ✓ Scope 1,2 & 3 carbon emissions have been measured.
- ✓ A carbon reduction plan has been identified.
- ✓ Progress against that plan is being measured and reported internally.
- ✓ Data is shared with Pets at Home upon request.



Maturity Framework

This maturity model is a roadmap to help suppliers evaluate their performance and set targets for continuous improvement.



Additional Resources

You can find more information to support your carbon reduction journey on our [knowledge hub](#). Contact our Responsible Sourcing team to obtain a login



Additional Resources

UK Health & Safety Executive –
[REACH Guidance](#)

British Retail Consortium (BRC) – Net Zero Roadmap –
[UK retail industry commitments to Net Zero by 2040](#)

Food and Drink Federation (FDF) –
[Resources to help food manufacturers to understand and reduce their carbon emissions](#)

UK Pet Food –
[General support on reducing the environmental impact of pet food](#)

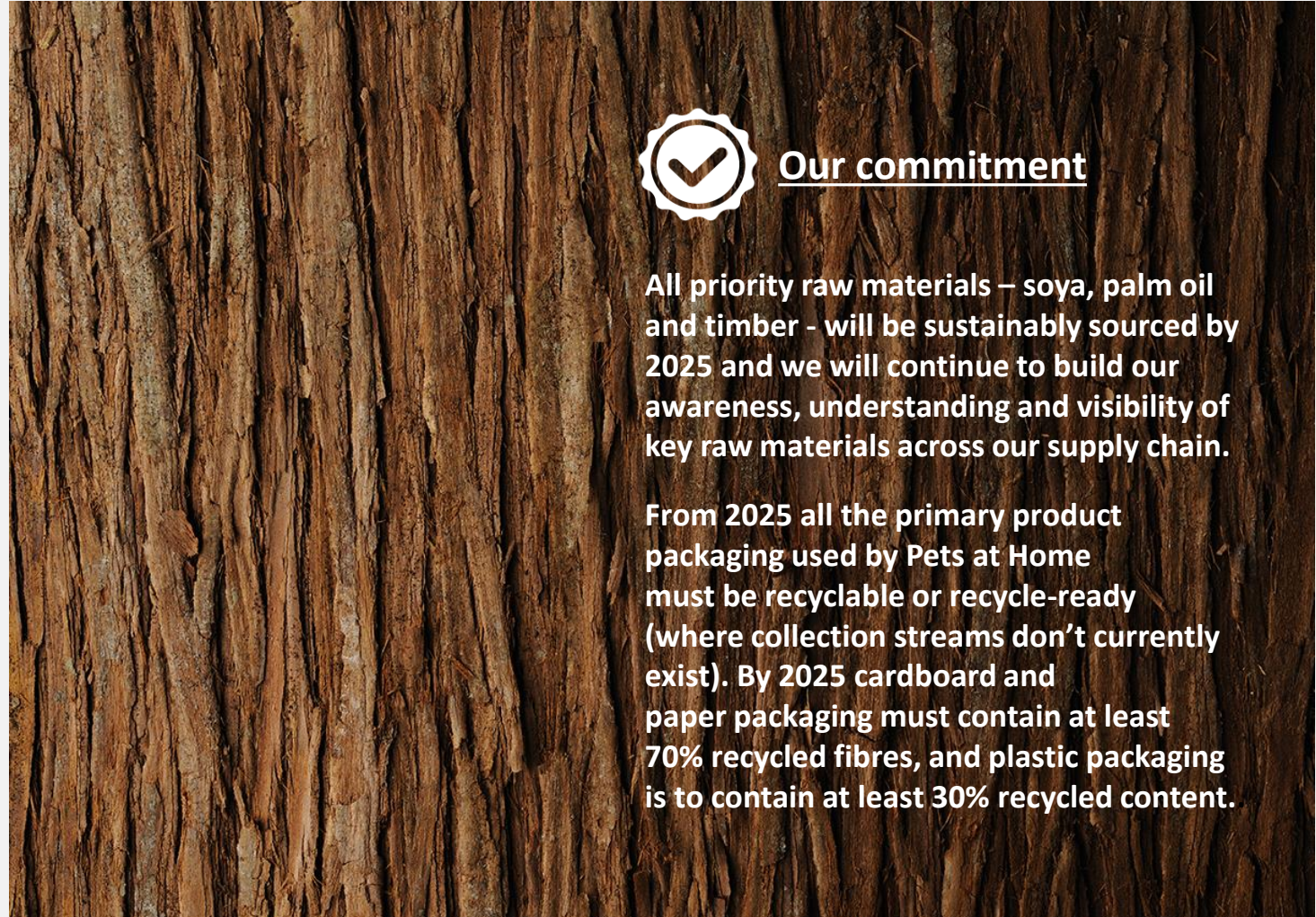
FEDIAF – The European Pet Food –
[General support on reducing the environmental impact of pet food](#)

Pet Sustainability Coalition (PSC) –
[General resources on pet industry](#)



Raw materials are responsibly sourced

Over-exploitation of natural resources damages ecosystems and threatens the livelihoods and wellbeing of local communities. Deforestation of biodiverse forests for farming not only destroys habitats, but it also contributes to climate change. Unsustainable farming and production methods which cause environmental damage, which don't safeguard animal welfare, and which exploit workers, have no place in our supply chain.



Our commitment

All priority raw materials – soya, palm oil and timber - will be sustainably sourced by 2025 and we will continue to build our awareness, understanding and visibility of key raw materials across our supply chain.

From 2025 all the primary product packaging used by Pets at Home must be recyclable or recycle-ready (where collection streams don't currently exist). By 2025 cardboard and paper packaging must contain at least 70% recycled fibres, and plastic packaging is to contain at least 30% recycled content.



Supplier Code of Conduct

We encourage our suppliers to create better, more sustainable products using raw materials from sustainable sources.



Please refer to our [Raw Materials Sourcing Policy](#) and our [Packaging Policy](#) for specific requirements on priority raw materials.

Supplier Guidance

19.1 Priority Raw Material - Palm Oil

Palm oil is a significant driver of deforestation and biodiversity loss particularly in South-East Asia. This deforestation has led to significant impact on iconic species, such as orangutans and Sumatran tigers and driven greenhouse gas emissions through land use change. All suppliers of own label and exclusive brands shall declare palm oil usage, volumes and country of origin. By 2025 all palm oil in these products must be certified to the Round Table on Sustainable Palm Oil (RSPO) or equivalent standard with a fixed cut-off date for deforestation no later than 2020.

19.2 Priority Raw Material - Soya

Soya production is a significant driver of deforestation and biodiversity loss particularly in South America. It is seen to be one of the leading causes of deforestation in the Amazon, which has a significant impact on animal and plant species as well as the Earth's climate. All suppliers of own label and exclusive brands shall declare Soya usage, volumes and country of origin. By 2025 all Soya in these products must be from areas not associated with deforestation or certified to the Round Table on Responsible Soy Association (RTRS) or equivalent standard with a fixed cut-off date for deforestation no later than 2020.

19.3 Priority Raw Material - Timber

a) All suppliers of own label and exclusive brands shall disclose the following information for products containing timber:

- ✓ Scientific and common name for the species of timber
- ✓ Country of harvest
- ✓ Volume of timber or timber products
- ✓ Chain of custody for certified timber
- ✓ Evidence of provenance and proof of legality for non-certified timber.

b) Suppliers shall not source products containing timber, fibre and other raw materials if any of the following apply:

- The source forest is unknown.
- The material was illegally harvested or traded.
- The material was traded in a way that drives violent armed conflict or threatens national or regional stability (i.e., what is commonly called conflict timber). The harvesting or processing entity, or a related political or military regime, is violating human rights.

- The material is sourced from genetically modified trees
 - The source forest is known or suspected of containing high conservation values, except where the forest is certified, or in progress to certification under a credible certification system, or the forest manager can otherwise demonstrate that the forest and/or surrounding landscape is managed to ensure those values are maintained.
 - The source forest is being actively converted from natural forest to a plantation or other land use, unless the conversion is justified on grounds of net social and environmental gain, including the enhancement of high conservation values in the surrounding landscape.
- c) By 2025 all timber in our own label or exclusive brand products must be certified to the Forestry Stewardship Council (FSC) standards or other equivalent management schemes such as PEFC.



Supplier Guidance

19.4 Cotton

a) Non-sustainable cotton production is linked to various environmental and social challenges. Wherever possible, suppliers shall use fibres from more sustainable sources including Organic, Fairtrade, Better Cotton Initiative (BCI) or recycled cotton. This shall apply to cotton and cotton blend fabrics, trims, components, linings and fillings wherever certified sustainable sources are available.

b) Suppliers must declare the country and region of origin for uncertified cotton fibres. If this is unknown, suppliers shall commit to taking all reasonable steps to map their cotton supply chain.



19.5 Feathers and down

Wherever possible, feathers and down shall be sourced from certified sources which assure higher animal welfare standards - [The Responsible Down Standard \(RDS\)](#) and [Downpass](#).

19.6 Natural rubber

Wherever possible, natural rubber shall be sourced from fully certified sources which ensures the material production has not contributed towards deforestation, environmental damage and human rights abuses – [FSC](#) or [PEFC](#).

19.7 Leather

The production of leather has significant environmental and social impacts from deforestation, high water use, use of dangerous chemicals, untreated waste and health & safety concerns. Wherever possible, suppliers shall use leather from tanneries which have been rated against the Leather Working Group standard to ensure good traceability and standards of environmental compliance. <https://www.leatherworkinggroup.com/leather-manufacturers-and-traders/leather-manufacturers/our-rated-members>



19.8 Recycled material

Wherever possible, suppliers should seek to use recycled materials in our products in lieu of virgin materials whilst ensuring that safety, chemical compliance and fibre composition legislation is complied with. Recycled materials should be [GRS or RCS certified](#) wherever possible.

19.9 Preventing waste

Wherever possible, suppliers shall seek to utilise off-cuts of fabric or unsold/downgraded fabric whilst ensuring this meets our strict requirements for safety, quality and functionality.



Supplier Guidance

19.10 Conflict Minerals

The trade in minerals and mining of minerals has often been linked to serious environmental damage and human rights abuses including child labour and poor health & safety practices. Furthermore, in high-risk areas, the mineral trade can directly or indirectly finance armed conflict, fuel forced labour and facilitate money laundering and corruption. The minerals tin, tantalum, tungsten, gold and cobalt are categorised as conflict minerals. These materials are commonly found in electrical components.

- Suppliers shall evaluate if any conflict minerals are present in their products.
- Suppliers shall identify and assess risks in the supply chain and develop policies which support the responsible sourcing of minerals.
- Suppliers shall take steps to map mineral supply chains to identify country of origin and inform Pets at Home if high risks are identified in their mineral supply chain.

Top 3 mineral sourcing countries

Tin	Tantalum	Tungsten	Gold	Cobalt
China	Democratic Republic of Congo	China	China	Democratic Republic of Congo
Indonesia	Rwanda	Vietnam	Russia	Russia
Myanmar	Brazil	Mongolia	Australia	Australia

Common uses

Tin	Tantalum	Tungsten	Gold	Cobalt
Alloys	Alloys	Automatic watches	Calculators	Batteries
Anodes	Camera lenses	Drills	Cell phones	Ceramics
Batteries	Capacitors and resistors	Electrodes	Connecting wires	Electroplating
Bronze	Communications systems	Filaments	Connectors	Glass
Containers	Electronics	Fluorescent light bulbs	Computers	Magnetic recording media
Dielectrics	Fountain and ballpoint pen points	Hardware	Edge connectors	Magnets
Electronics	Galvanized, hardened, heavy duty, tempered or heat-treated steel	Halogen tungsten lamps	Electronics	Paints, inks, varnishes, dyes and pigments
Gas tanks	High speed processing	High-speed cutting tools	Glass	
Paint, oil, polish, cleaners	Lab equipment	High temperature lubricants	GPS devices	
Pewter	LED lights	Jewellery	Soldered joints	
Resistors	Portable electronics	Joints	Switch and relay contacts	
Solder	Wire	Lighting	Televisions	
Water purifiers		Magnetrons for microwave ovens	Wire	
		Television tubes		
		Tools		
		Welding tools		
		Wires		



Supplier Guidance

19.11 Sustainable fish

Wherever possible, suppliers shall source fish which is certified to either the Marine Stewardship Council (MSC) chain of custody standard or Aquaculture Stewardship Council (ASC) standard. Both provide assurances of social and environmental performance and MSC ensures that fish stocks are sustainably fished.

19.12 Packaging

From 2025 all the primary product packaging used by Pets at Home must be recyclable or recycle-ready (where collection streams don't currently exist). By 2025 cardboard and paper packaging must contain at least 70% recycled fibres, and plastic packaging is to contain at least 30% recycled content.

19.13 Sustainability claims

Suppliers must be able to substantiate any sustainability claims.

19.14 Circularity

Suppliers shall consider end of life for all products. Considering how products can be designed for reuse, remanufacturing and recycling.



The Competition and Markets Authority (CMA), the UK's primary competition and consumer authority, introduced new rules last year to ensure that environmental claims made by businesses comply with the updated consumer protection law. **The new rules, known as the [Green Claims Code](#), ensure that any environmental claims on goods and services do not mislead customers and can be substantiated. The rules are simple:**

1. Claims must be truthful and accurate
2. Claims must be clear and unambiguous
3. Claims must not omit or hide important relevant information
4. Comparisons must be fair and meaningful
5. Claims must consider the full life cycle of the product or service
6. Claims must be substantiated



Supplier Guidance



Additional Resources

Palm Oil –

[RSPO](#) and [RSPO Supply Chain Certification schemes](#)

Soya –

[Roundtable on Responsible Soya \(RTRS\)](#)

Soya –

[Proterra](#)

Timber, Wood, Paper & Card –

[FSC](#) or [PEFC](#)

Cotton –

[Organic](#), [Fairtrade](#), [Better Cotton Initiative \(BCI\)](#)

Synthetic materials –

[Recycled Claim Standard/Global Recycling Scheme \(RCS/GRS\)](#)

Leather –

[Leather Working Group](#)

Responsible Mineral Initiative (RMI) –

[Various](#)

EU –

[CAHRAS \(Conflict-affected and high-risk areas\)](#)

OECD –

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

EU –

[Conflict Minerals Regulation Guidance](#)



Animal welfare is assured

It is important to us and important to our customers that our products are produced with the highest standards of animal welfare, covering every stage of an animal's life and that they are slaughtered in the most humane way possible.



Our commitment

Pets at Home is committed to the responsible sourcing of products derived from animals and actively working towards progressively higher standards of animal welfare in our supply chains.

We recognise the Five Domains Model and corresponding General Welfare Aims as a framework for assessing the physical and mental wellbeing of animals (Mellor 2016¹ and Mellor et al. 2020²):

1. Good Nutrition - To minimise thirst and hunger and enable eating to be a pleasurable experience.
2. Good Physical Environment - To minimise discomfort and exposure to adverse environmental conditions and to promote physical comfort.
3. Good Health - To minimise pain, disease, and other discomforts and to promote the pleasures of vigour, strength, robustness, and harmonious physical activity.
4. Appropriate Behavioural Interactions - To minimise threats and unpleasant restrictions on behaviour and movement, and to promote engagement in rewarding activities.
5. Positive mental experiences - To promote the experience of various forms of comfort, pleasure, interest, confidence, and a sense of control.

We are actively exploring:

- Credible material certification and assurance schemes for animal-derived raw materials.
- Opportunities to replace animal-derived materials with sustainable animal-free alternatives

20



Supplier Code of Conduct



Suppliers must ensure that products derived from animals are responsibly sourced to ensure the highest standards of animal welfare. Animal testing of household and hygiene products or their ingredients is prohibited.

See our full [Supply Chain Animal Welfare Policy](#)



Additional Resources

Four Paws – [Animal Welfare Policy Development Guidelines in Textiles](#)

Supplier Guidance

Our Responsible Sourcing Audits now include an assessment of compliance to these animal welfare standards:

20.1 Policy & Due Diligence

All suppliers must commit to the responsible sourcing of animal-derived products in a policy statement. Adequate due diligence must be in place to support this commitment. This could include an animal welfare assessment incorporated into the supplier approval procedure and/or the purchase of certified materials which provide assurance of higher animal welfare standards.

20.2 Species and Provenance

Suppliers must declare the species and identify the provenance of animal-derived raw materials. We recognise that it can be more challenging to map non-food supply chains, but we expect suppliers to take all reasonable steps to do so.

20.3 Slaughter Standards

We require all meat and poultry to come from animals that have been humanely slaughtered, and animals must be pre-slaughter stunned. We recognise the [Humane Slaughter Association codes of practice](#).

20.4 Material Origin

We require all animal-derived materials used in our non-food products to come from conventionally farmed species and be a by-product of the food industry (except for wool).

20.5 Prohibited materials

The following materials are prohibited from use:

- Angora (Angora Rabbits)
- Animal testing of household and hygiene products or their ingredients.
- Any material obtained from live skinning, live plucking or live boiling.
- Any material obtained from sporadic or induced aborted animals e.g., Slink, Astrakhan (Karakul).
- Alpaca fibre.
- Endangered species (as defined in the Convention on International Trade in Endangered Species list: www.cites.org or from the International Union for the Conservation of Nature red list as critically endangered, endangered or vulnerable: www.iucnredlist.org (unless valid exemptions apply).
- Exotic Leather (e.g., snakes, crocodiles, reptiles).
- Fur (all types).
- Pig skin leather and cow hide sourced from India.
- Leather from cats or dogs.
- Mulesed wool (or meat).
- Materials obtained from force-fed animals.
- Mohair (Angora Goats).
- Vicuna and Yak Wool.

20.6 Review and Monitor

Suppliers must review their animal welfare policy at least annually and monitor compliance as part of their internal audit programme.



Questions?



Feedback?



Ideas?



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