Modern Slavery Statement

Financial year ended 31 May 2026 ("FY26")

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Jollyes during the financial year ended 31st May 2026 to address the risks of modern slavery and human trafficking in our business and supply chains, together with the specific steps we are taking to strengthen our approach in the year ahead.

We want to be open about where we are. Our formal activity on modern slavery to date has been limited, and we have made this a clear priority for the business. During the year we began developing a broader ESG strategy – of which responsible sourcing and the prevention of modern slavery are central components – and this statement therefore describes both the measures we currently have in place and the concrete plan we are putting in place to build on them.

Jollyes is committed to acting ethically and with integrity in all of our business relationships, and we do not tolerate slavery, servitude, forced or compulsory labour or human trafficking in any part of our operations or supply chain.

Our organisation, structure and supply chains

Jollyes – the trading name of Clifford Equityco Limited (company number 15489386) – is a specialist pet retailer operating 122 stores across the United Kingdom (as at 31st May 2026), supported by an online channel and central distribution.

The majority of our suppliers are UK-based, and wherever possible we build long-standing relationships with national and local partners. We also source a proportion of our products – in particular certain own-label ranges and general merchandise such as pet toys, accessories and textiles – from manufacturers overseas, including in the Far East.

We recognise that our supply chain extends beyond the suppliers with whom we contract directly to the sub-contractors and producers behind them, and that visibility reduces at each tier. We currently have the greatest visibility over our Far East manufacturing factories, which are subject to independent audit (see due diligence, below). Extending that visibility deeper into the supply chain, and across our service providers, is one of our priorities for the year ahead.

Our policies

Our approach is underpinned by policies available to all colleagues on our staff intranet:

- an **anti-slavery and human trafficking policy**, setting out our commitment and the controls we apply;
- an **employee code of conduct** and a **grievance policy**, enabling colleagues to raise concerns, including any indicators of exploitation they observe; and
    - an **externally managed whistleblowing route** available for all colleagues employed by Jollyes.

Modern slavery is addressed within our current supplier terms and conditions, which require suppliers to operate lawfully and ethically. Agreement to these terms is a condition of doing business with Jollyes.

As part of the ESG strategy now in development, we are preparing a dedicated supplier code of conduct. This will set out our expectations on modern slavery and wider responsible-sourcing standards in greater detail, and will apply across our supply base including service providers.

Risk assessment and management

Based on the nature of our operations and sourcing, we consider the areas of highest inherent risk to be:

- **overseas own-label and general-merchandise manufacture**, particularly in lower-cost sourcing regions;
- **warehouse, distribution and seasonal / agency labour**, a recognised UK risk area;
- **logistics and transport**; and
- **outsourced services such as cleaning and security**, commonly associated with labour exploitation in the UK.

Formalising this understanding into a documented, group-wide modern slavery risk assessment is part of the ESG work now underway, and is one of our priorities for the year ahead. Any instances of non-compliance identified are reviewed by the Operating Board and appropriate action is taken, up to and including ending the relationship with the supplier concerned.

Due diligence

Our current due-diligence measures are set out below, and we are candid that they are the starting point from which we intend to build.

- **Independent factory audits.** Our Far East manufacturing factories are subject to independent third-party audits assessing working conditions. These audits are currently conducted on an **announced** basis.
- **Moving to unannounced audits.** We recognise that announced audits have limitations, as sites can prepare in advance. We therefore intend to move to **unannounced** audits across our supplier base, including service providers. Because this must extend to all suppliers and service providers, an implementation timeline is still being developed and will be confirmed as the programme is scoped.
- **Supplier terms.** Modern slavery is addressed within our supplier terms and conditions, to be reinforced by the supplier code of conduct in development.
- **Accreditation.** Many core own brand suppliers have internationally recognised independent accreditations, such as BRC, but we intend to make it a trading requirement for all future new suppliers of physical products.

Measuring effectiveness

We recognise that a credible approach must be measurable. As our ESG strategy, supplier code of conduct and audit programme take shape over the coming year, we will gather the data needed to establish a baseline against which our progress can be measured.

From that baseline we will set targets and report against them in future statements, so that year-on-year improvement can be clearly demonstrated. The indicators we expect to track include the proportion of suppliers covered by our code of conduct, the share of audits conducted on an unannounced basis, colleague training completion, and any concerns raised or cases identified.

Training and awareness

All colleagues are made aware of our commitment to preventing modern slavery as part of their induction.

As part of the ESG work now underway, we will introduce role-specific training for colleagues in higher-exposure roles – in particular our buying and category teams, who make sourcing decisions. Through our supplier terms, and the code of conduct in development, parties in our supply chain are made aware of their own responsibility to control these risks.

Our priorities for the year ahead

We have made modern slavery and responsible sourcing a clear focus. Our priorities for the coming year are to:

- complete and roll out our ESG strategy and dedicated supplier code of conduct, including our expectations on modern slavery, across the supply base and service providers;
- formalise a documented, group-wide modern slavery risk assessment;
- move from announced to unannounced independent audits across all suppliers and service providers, and confirm an implementation timeline;
- extend supply-chain mapping and visibility beyond our direct suppliers;
- introduce role-specific training for colleagues in higher-exposure roles; and
- establish our baseline indicators and report on our progress against them in next year's statement.

This work is led by Adam Dury, Chief Executive Officer, together with Claire Goldenberg, Chief People Officer, and Anne Galloway, Commercial Director, with oversight from the Board.

Collaboration and engagement

We engage with relevant trade associations and government agencies to keep our understanding of modern slavery risks and good practice up to date. This statement is published in a prominent place on our website with a link from the homepage, and will also be published on the UK Government's Modern Slavery Statement Registry. Prior years' statements remain available online.

Approval

This statement covers the financial year ended 31st May 2026 and was approved by the Board of Directors of Clifford Equityco Limited (trading as Jollyes) on 29th July 2026. It will be reviewed and updated annually, and we will report on the progress of the priorities set out above.

The board of directors approved this statement.

Adam Dury

Chief Executive Officer

Date: 29th July 2026