

ManyPets

Modern Slavery Statement



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In a world marked by economic turbulence, shifting employment landscapes, and ongoing global conflicts, the risk of exploitation and human trafficking remains high.

These challenges disproportionately impact vulnerable communities, making it more important than ever for companies and organisations to act with purpose and integrity.

As the Group CEO for ManyPets, I am committed to ensuring we have robust practices and risk mitigation plans in place so we continue to protect and contribute to a future that is free from modern slavery.

Luisa Barile

Luisa Barile | Group Chief Executive Officer

This Modern Slavery Statement has been published in accordance with the UK Modern Slavery Act ("MSA") 2015. Section 54 of the MSA requires every organisation with a global annual turnover of £36 million - which carries out business (or part of a business) in the UK - to produce a slavery and human trafficking statement for each financial year.

This statement applies to Many Group Ltd (referred to in this statement as the 'Company' or 'ManyGroup') and its subsidiaries (the Company and its subsidiaries referred to collectively in this statement as the 'Group' or 'we' and individually as a 'group company').

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Who we are

ManyGroup is the holding company for our Group brands: ManyPets Ltd, ManyPets Inc., and VetBox Ltd. We trade under the brand ManyPets globally for our cat and dog insurance products and VetBox for our pet health subscriptions. Our core business is pet insurance, and we now insure over half a million pets globally.

We are regulated by the UK Financial Conduct Authority and in the USA our home regulator is the Delaware State Department of Insurance.

- Our UK operations are run as ManyPets Ltd in Haywards Heath (Sussex), Birmingham and London.
- Our USA operations are run through ManyPets Inc. in Atlanta, Georgia.

Our leadership

We have a Group Board with a non-executive Chairperson, one founder director, three other non-executive directors and one executive director. The Group Leadership Team is responsible for operational management of the business and, with our country leadership teams, for the implementation of our approach to Modern Slavery.

Our Modern Slavery Working Group at ManyPets is responsible for managing and monitoring our modern slavery programme and taking action to mitigate risks facing our customers, employees, and our supply-chain. The Working Group is comprised of representatives from Operations, People, Procurement, Legal and Risk.

Our Approach

We do not support or condone modern slavery in any form. It's wrong in every respect and is contrary to the operation of ethical business - and specifically contrary to our company values, which are:

- Show We Care
- Do the Right Thing
- Work Together

Our exposure to modern slavery and human trafficking is limited based on the following factors:

- The nature of our business and the services we provide
- The sectors and jurisdictions that we operate in
- The digital-first nature of our business

Our priorities for 2026:

- Refresh our modern slavery risk profile where appropriate
- Review and where appropriate refine our approach to modern slavery due diligence on suppliers
- Continue to monitor and prepare for legislative amendments to the Modern Slavery Act 2015 and associated guidance

Talking about modern slavery

We know that putting a stop to modern slavery is something we all take responsibility for. We can't do this without encouraging awareness and action against modern slavery. We currently provide a

ManyPets

variety of methods to help our people access learning resources on modern slavery. We do this through our onboarding programme for new joiners and via internal communications as follows.

- ✓ Annual and new joiner training.
- ✓ We have 24/7 online access to relevant modern slavery content on Kallidus - our learning management tool.
- ✓ The objective of these courses is to enable all employees to define modern slavery, identify different forms of modern slavery, and recognise key pieces of legislation and approaches to deal with modern slavery.
- ✓ Awareness of our policies is shared through our onboarding sessions.
- ✓ We plan to include a dedicated section within our newly created 'book of culture' and employee handbook. This will go out to all new joiners.

Supplier relationships + procurement

ManyPets procurement function is committed to conducting business responsibly, ethically, and with integrity. We recognise our responsibility to do what we can to prevent modern slavery, human trafficking, forced labor, and exploitative practices within our operations.

Our Approach

We are dedicated to ensuring that our procurement practices promote fair, safe, and respectful working conditions. We expect all our suppliers, contractors, and business partners to uphold the same high standards.

These are outlined in the ManyPets Procurement Policy which forms part of our all-company compliance guidelines. These guidelines outline what due diligence and detailed checks need to happen, before we enter into a material agreement with a new supplier or partner.

This policy is available in the Procurement Portal on our intranet (ManyNet) which allows all our teams to access our documents and policies and provides an easy way for anyone to get in touch with the team with any questions or concerns.

Supplier Due Diligence (On-boarding)

- We conduct thorough assessments of potential suppliers to identify and manage risks related to modern slavery and unethical labor practices.
- Our contracts and procurement policies include clauses requiring compliance with labour, human rights, and ethical sourcing standards.
- We work collaboratively with suppliers to improve transparency and encourage responsible business conduct.
- We also operate a ManyPets Vendor Code of Conduct ("Code"). In this Code, we set out our expectations regarding modern slavery with the suppliers. This Code is shared as part of our procurement supplier onboarding process, and we expect all vendors and suppliers to embrace the spirit of our own commitment.

Our People processes

We mitigate the risk of modern slavery when sourcing and hiring talent by ensuring we have robust checks at every step of the process. Our aim is to ensure we safeguard others against human trafficking or individuals being forced to work against their will.

Given the specialist nature and operating locations of our current recruitment practices, we feel this is a low-risk area for our business for the year ahead.

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We primarily advertise our opportunities directly, through global websites (including our own jobs board) to encourage applications from a wide talent pool. All applications are managed by a central platform which allows us to track the source of every inbound application and their personal details. We do this so we can make sure we're speaking directly with the applicant and not a third party. Any changes to a candidate's personal details will require the request to be managed by a member of our Talent team. Email addresses, telephone numbers and personal information cannot be edited by a user or third party from outside of our company.

We arrange an initial screening call with all candidates we want to progress to an interview. We typically hold these meetings via Zoom and ask that no other person is present other than the candidate and our recruiters. We will verify their suitability for the role, right to work, and identity prior to engaging them in a formal process. Throughout the process we request that all candidates interview on their own with our hiring panel - and we ask that all interviewers join the meetings with both video and audio capability enabled. If we see something that doesn't feel right, this is escalated internally to a senior manager in our People team.

We sometimes utilise the services of third-party recruitment agencies and we expect all our recruitment partners to uphold the same due diligence as we do when hiring directly. Our standard supplier terms reference a requirement to comply with all applicable legislation and codes of practice. We always bear the cost of any associated fees. For further information on our current process for onboarding third party suppliers, please refer to the procurement section within this document.

We extend offers of employment and contractor agreements directly with the person we hope to employ or engage. The only exception will be if someone has been introduced via a recruitment partner. However, all candidates, whether sourced directly or through an agency, receive a formal written offer letter from us. This is sent directly to the individual and is not shared with anyone else. All new joiners to our company are issued with either a contract of employment or a contractor agreement which is compliant with applicable local laws. Our contracts contain both their contractual and statutory rights (such as holiday pay, sickness pay) and any other benefits to which they may be entitled. Contracts are shared for secure signature via DocuSign and the signed copies are sent directly to the employee and saved in the employee's personal folder, which can be accessed by them anytime during their employment with us.

For all new employees, the candidate's previous five years' work or study history is verified, and certain pre-employment checks are carried out, all at the company's cost. These checks may include a criminal background check, and a financial, address and ID check. We conduct our right to work checks in line with current government rules, using a government approved Identity Verification Service Provider background checking platform, Zinc, where possible. We follow this up with a video call with the new employee and somebody from the People team present.

Reward and Recognition

Our reward process is fair and consistent - and we uphold industry standards on employee wages, benefits, working hours and minimum age. This approach is followed in all countries where we operate, without any unauthorised deductions.

We avoid modern slavery by paying a fair, externally benchmarked salary for the country where the role is based. We review the salary range when we start the initial search for the role. Once agreed, the role is flowed into our annual salary and remuneration review process. We also undertake regular "pay audits" which show us trends and patterns to identify roles that can be above or below market pay; ensuring again that we pay people fairly for the job that they do.

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We know that there is a greater risk of modern slavery for certain demographic groups. We do not (and will not) ever pay someone differently based on their gender identity and we share a detailed breakdown of our gender pay gap reporting in the UK via the government portal.

Policies

We have created and update the following company policies which support our mission to stop modern slavery.

- Whistleblowing Policy – published on our HRIS and intranet to encourage employees to report concerns about individual or company practices that could promote or support modern slavery.
- Our Approach to Inclusion – published on our HRIS and shared directly with all new joiners - is our zero-tolerance approach to harassment, bullying and discrimination based on protected characteristics.
- Sharing Sensitive Data Policy – published on our HRIS - sets out our processes and restrictions to safeguard personal information for our employees and potential new employees.

Whistleblowing

We are regulated by the Financial Conduct Authority in the UK, so it's vital that our people know how to raise a concern about how we're doing business should the need arise. As part of our onboarding process, we explain to everyone across our company how they can raise a concern or flag unethical conduct and modern slavery related risks. Our intranet page has a separate Risk and Compliance section with dedicated pages for both Whistleblowing and Modern Slavery for greater clarity.

On the Whistleblowing page, employees can access a digital submission form enabling them to submit any feedback or concerns at any time, from any region. Submissions to this can be made anonymously. We have also included a dedicated Whistleblowing E-Learning module as part of the annual mandatory compliance E-Learning modules, alongside a link to the policy and intranet page. We implemented it this way to ensure all new joiners are aware of and how to find the resources.

Our commitment to environmental, social and corporate governance

The climate crisis is a threat to life on this planet as we know it. Greenhouse gas emissions across the world have been steadily rising and we can now actively see the impact this is having on the planet. Rising temperatures are leading to an increase in natural disasters and extreme weather conditions, and we are seeing vast environmental degradation to the natural environment around us. This rise in natural disasters and extreme weather conditions can have a negative impact on the socio-economic vulnerabilities in some countries – leading to marginalisation and an increased risk of modern slavery.

Each of our employees has the opportunity to take two days fully paid leave to support our charity partners, or a charity of their choosing.

Key performance indicators

We use the following key performance indicators ("KPIs") to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Due diligence carried out on new suppliers for Strategic and Mission Critical Supplier contracts to satisfy ourselves that we can continue to engage with them.

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- Appropriate anti-slavery clauses to be included in each of these contracts.
- We have an established procurement team and operate a procurement policy and dedicated procurement platform.

How we've measured our impact over the last 12 months

- 100% of employees have a verified right to work check through Zinc.
- 100% of workers and employees who do not have the right to work in the UK without restriction are audited annually to ensure no changes to their status.
- Training courses that raise awareness are assessed with a baseline pass rate of 80%. This is reportable via our learning platform, Kallidus.
- Completion rate of the Modern Slavery E-Learning module is currently at 96% - a significant improvement as we were unable to accurately report on this in our previous learning management system.
- CPD records include reflection on training completed by named individuals that will evidence their awareness of and participation in the training.
- 85% of respondents in our most recent company-wide engagement survey stated that if *'they see a behaviour they're uncomfortable with they know how to share feedback and raise concerns'*. This is a 12% increase from our December 2024 survey.
- We have had no whistleblowing reports related to modern slavery. Any that are raised will be actioned, logged, shared with our senior leadership.

Further reading and related policies

- Procurement Policy
- Our Approach to Inclusion
- Sharing Sensitive Information Policy
- Whistleblowing Policy
- Disciplinary and Capability Policy

All the policies related to this document can be accessed by our employees through our People system "Bob" under "Company Documents".

Help and assistance

If you or someone you know is being or has been exploited or you are unsure if someone needs help, here are some contacts for you to approach:

Call 999 and ask for "police" for life-threatening emergencies.

Call 101 for non-emergencies.

Modern Slavery Helpline - 08000 121 700 or contacted via an [online form](#)

Victim Support - 0808 16 89 111 or contacted via an [online form](#)

Crimestoppers - 0800 555 111 or contacted via an [online form](#)

Migrant Help - 0808 8010 503

The Salvation Army have a 24/7 confidential referral helpline: 0800 808 3733

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Approved by the boards of Many Group Ltd, ManyPets Ltd and VetBox Ltd.

Luisa Barile
Group Chief Executive Officer

30 September 2025

Many Group Ltd

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