

Modern Slavery Statement

September 2026

A MESSAGE FROM OUR CEO

Modern slavery remains one of the most serious human rights issues facing businesses today. Global instability and continued pressure on labour markets mean the risks of exploitation, forced labour and human trafficking remain significant.

At ManyPets, we continue to strengthen our understanding of these risks and the steps we take to address them, with robust governance, supplier due diligence and people processes in place across our business.

As Group CEO, I am committed to ensuring we continue to take meaningful and effective action to prevent modern slavery and human trafficking in our business and supply chain, and to play our part in creating a future free from exploitation.

Luisa Barile



CEO, ManyPets Ltd and Many Group Ltd

This Modern Slavery Statement is made on behalf of Many Group Ltd for the financial year ending 31 March 2026, in accordance with Section 54 of the UK Modern Slavery Act 2015.

About us

Our group of companies

Many Group Ltd is the holding company for our group brands: ManyPets and VetBox. We trade under the brand 'ManyPets' for our cat and dog insurance products and 'VetBox' for our pet health subscriptions.

ManyPets Ltd, which is our UK operational entity, is regulated by the UK Financial Conduct Authority and headquartered in London.

Leadership

We have a Group Board with a non-executive Chairperson, one founder director, three other non-executive directors and one executive director. The Senior Leadership Team is responsible for operational management of the business and 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 2026 Modern Slavery priorities

- Refresh our modern slavery risk profile.
- 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.

Our values

Show you care

- Start with kindness
- Listen to understand
- Go the extra mile

Do the right thing

- Are accountable
- Explain well
- Find solutions

Work as one

- Prioritise clearly
- Feed back honestly
- Win as a team

Define tomorrow

- Act bravely and adapt
- Rethink to innovate
- Aim to make a lasting impact

Supplier relationships and 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 labour, and exploitative practices within our operations.

We are dedicated to ensuring that our procurement practices promote fair, safe, and respectful working conditions. As part of our procurement supplier onboarding process, we expect our suppliers, contractors, and business partners to uphold the same high standards.

Our approach

The ManyPets Procurement Policy forms part of our company policy suite. It outlines what due diligence and risk-based checks are required to be completed before we enter into a material agreement with a new supplier or partner.

Supplier due diligence (onboarding)

- We conduct thorough assessments of potential material suppliers to identify and manage risks related to modern slavery and unethical labour practices.
- We include Modern Slavery clauses within our contract templates 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 vendors and suppliers to embrace the spirit of our own commitment.

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

- 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.
- We place contractual obligations on our material suppliers or partners to comply with relevant law and regulation, including anti-slavery.
- We have an established procurement team and operate a procurement policy and dedicated procurement platform.

Our people and customers

We are committed to supporting a safe, fair and respectful environment for our people and our customers and recognise our responsibility to help prevent modern slavery, human trafficking, forced labour and exploitative practices.

Modern slavery risk affecting our people is managed through our direct employment model, structured recruitment process and pre-employment checks. We also consider the potential for risk where third-parties are involved in recruitment or employment related services.

For customers, the risk of modern slavery is most likely to arise indirectly, for example, where individuals may interact with our products, claims processes or customer support channels. We therefore maintain appropriate awareness and training to our employees, clear reporting routes and policies which support the identification and escalation of modern slavery.

Our approach

We all share responsibility for helping prevent modern slavery. To support awareness and action, we provide modern slavery learning resources through new joiner onboarding, annual training and internal communications. We do this through:

- A mandatory modern slavery e-learning module which must be completed during new joiner onboarding and refreshed annually.
- Awareness of our policies through our onboarding sessions.
- We apply robust recruitment controls to help prevent modern slavery, human trafficking, and forced labour, including candidate, right to work checks, and pre-employment screening.
- Where recruitment agencies are used, we require them to uphold equivalent due diligence standards and comply with applicable laws. Recruitment fees are borne by us and never charged to candidates.
- We engage directly with candidates through our recruitment process and conduct interviews to verify identity and suitability, escalating any concerns to the People team.
- All offers of employment and contractor agreements are issued directly to the individual, with terms clearly setting out their rights, entitlements, and benefits in accordance with applicable laws.

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

100%

of employees have a verified right to work check through Zinc

96%

completion rate of the Modern Slavery E-Learning module

88%

of respondents in our June 2026 survey know how to raise a concern

S P E A K U P

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.

P O L I C Y S U I T E

Other relevant company policies

We have in place the following company policies and frameworks which support our mission to stop modern slavery:

Procurement Policy

Whistleblowing Policy

Group Risk Management Policy

Our Approach to Inclusion

Disciplinary and Capability Policy

All our company policies can be accessed by our employees through our People system.

MEASURING PROGRESS

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:

KPI	OUTCOME
Number of Whistleblowing reports received relating to modern slavery	0
Number of modern slavery queries submitted to the People Team	0
Number of modern slavery incidents identified	0
% of employees completed modern slavery training	96% (27th August 2026)

LOOKING AHEAD

Our priorities for 2027

In 2027, we will continue to monitor and strengthen our modern slavery controls by:

- Preparing for legislative amendments to the Modern Slavery Act 2015, associated guidance and any external developments relating to modern slavery.
- Continue to enhance modern slavery risk management in our procurement process.
- Maintain employee training and awareness of modern slavery.

SUPPORT

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:

999

Life-threatening emergencies — ask for "police"

101

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

CEO APPROVAL

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

Luisa Barile

Group Chief Executive Officer

30 September 2026

