

Modern Slavery Statement for Tails.com

Introduction

Our purpose at Tails.com is to improve the lives of dogs and their owners, and in doing so, our vision is to change the world of pet food for good. We are against all forms of slavery, child labour and trafficking, and we expect our teams and our suppliers to take all reasonable steps to make sure no form of exploitation takes place in our supply chain.

This is our sixth modern slavery statement published in accordance with the UK Modern Slavery Act (2015). Section 54 of the MSA requires every organisation with a global annual turnover of £36 million or more, which carries out business in the UK, to produce a slavery and human trafficking statement for each financial year. This statement sets out the steps we have taken to ensure no modern slavery exists in our business and its supply chain. Note that our financial year runs from January to the end of December.

Our Organisation and Supply Chain

We are an online direct-to-consumer business selling personalised pet food, founded in 2013. We use third party manufacturers to produce our food components, complementary items, and packaging. In 2024, 56% by value of our direct raw materials and services were sourced in the UK, with a further 44% from the EU.

We blend individually customised food orders in our manufacturing operations, based across two sites in the UK and one site in the Netherlands. We then use third party couriers to distribute packages to our customers in the UK and Europe. We also serve customers via trusted retailers in the UK market.

Our Policies on Modern Slavery

We have commitment from our CEO and board to take all the steps we can to make sure no form of exploitation occurs in our business, and have appointed our Operations Director as responsible to carry out our obligations and improve our processes over time. Our Modern Slavery Statement is published on our website and included in the UK Home Office's online registry.

We have a supplier and a retailer code of conduct, detailing the expectations from Tails.com of any partner that works with us. These are published on our website. The codes include,

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amongst other areas, a requirement to comply with the Modern Slavery Act. These codes have been shared with our key suppliers who have formally agreed to uphold them.

We have a sourcing process which describes the expectations of our suppliers when we onboard them. Our Responsible Sourcing Policy, shared with our internal team, establishes guidelines for buying new products and services for Tails.com, which includes taking steps to ensure no modern slavery is involved in the products or services we buy.

All our policy documents are kept within a register and reviewed as a minimum annually. We identify opportunities to strengthen these over time.

Governance

Tails.com has appointed “People, Pets and Planets Ambassadors” consisting of senior leadership across the organisation who ensure we’re clear on the positive and negative impacts of our business on all our stakeholders. The Ambassadors are responsible to make sure we have policies to enhance our positive impact and reduce negative impact, that plans are in place to improve our performance over time, and these actions are carried out. This includes amongst other areas, our policies and commitment to ensure no modern slavery exists in our business or supply chain. The People, Pets and Planets Ambassadors reports progress on each of our 6 impact areas of focus as a minimum annually to our board of directors and stakeholders.

Due Diligence

We take the following steps to reduce as far as possible any risk that modern slavery is present in our supply chain.

Contract Manufacturers, Courier Partners and Other Suppliers

We engage with all our suppliers to understand what they do to ensure modern slavery is not occurring in their business. We oblige them contractually to maintain our policies, and not doing so would constitute a breach of contract. We audit all suppliers, regardless of their size, before bringing them onboard via a questionnaire and a site visit where appropriate. We assess their compliance in the following areas:

- Corporate social responsibility, ethical and environment policies in place
- For UK suppliers, compliance with the National Minimum Wage Act 2018, or if international, employees are paid at least the prevailing minimum wage applicable within the country of operation
- Compliance with the Modern Slavery Act 2015

Agency Staff

We work with labour agencies to employ some contract staff to work in our UK operation. Our agents are contractually obliged to ensure the regular governance and collection of:

- Proof of Right to Work in the UK, and Proof of Identity for each person
- Confirmation that wages are paid into worker personal bank account of choice
- Compliance with the National Minimum Wage Act 2018 in the UK
- Compliance with the UK Modern Slavery Act 2015.

Our Team

We ensure all our people have the Right to Work in the UK or the Netherlands as appropriate and they have their own documents to support this. We check that their wage payments are going to an individual's nominated bank account.

At our UK sites, we pay everyone who works for us at least a Living Wage (which is above the statutory minimum wage) with the same minimum rate for our temporary operators as our permanent ones from the first day they start with us.

At our Dutch site in Amstelveen, we pay everyone who works for us above the minimum wage at the rate for 21 year olds, based on a 36 hour working week, even if they are younger than this.

All of our team receive an induction when they begin work, and receive ongoing on-the-job training to help them excel in their roles, progress their careers, and safeguard their wellbeing. All permanent staff having completed 6 months' service receive enhanced holiday, sick pay, enhanced maternity and paternity leave, entitlement to 10 days unpaid leave, and medical cash plan benefit. They also have access to our Employee Assistance Programme and our Learning and Development programme amongst other benefits.

We're currently working on the following to improve our due diligence:

- Documenting our direct labour recruitment process, including details of how the process works in our labour agency partner (e.g. address and bank account checks)

Training and Communication

To make sure that all of our team have a high level understanding of the risks of modern slavery and human trafficking in our business, we provide awareness training for everyone working for us. This includes how to recognise the signs of modern slavery and how to report issues.

- Company induction when all permanent employees join the business
- Awareness training for production operators included in site induction

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- Posters displayed prominently in our factories with the key messages

In April 2025 we were recognised as a Stronger Together Business Partner, evidencing our commitment towards tackling modern slavery. Stronger Together is an impact driven not-for-profit organisation that provides businesses with practical training, resources, business services and collaborative programmes to create a world where all workers are recruited responsibly and have an opportunity for work which is fair and free from exploitation.

We publish our Modern Slavery Statement on our company website, and also add this to the UK Government's voluntary registry to support collective effort to improve transparency and accessibility of positive action taken to address modern slavery in supply chains.

We're currently working on the following to improve our training and communication:

- Appoint and train a site "Modern Slavery Lead" for each of our locations to lead operational due diligence, awareness activities and assemble a team to respond to Modern Slavery issues should they arise
- Appoint a business "Modern Slavery Champion" to raise awareness and engagement of the issues of labour exploitation across Tails.com as a whole
- Train supervisors and managers on how to conduct investigations and other actions they should take to support victims of labour exploitation

Assessing and Managing Risk

We know that the risk of modern slavery is a dynamic and ever changing possibility in our supply chain. We are not complacent to the risk and so it is important that we have visibility of what's happening in our supply chain and identify opportunities for improvement. We review and take further steps to improve our handling of these issues.

We conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas. We conduct regular Supplier Performance Reviews, at least once per year, where we check progress against improvement projects, and whether the status in any area has changed. We have updated our internal Supplier Relationship Management process to include regular risk assessment, as a minimum annually, for every supplier. We can conduct unannounced audits of agency employee files to ensure compliance with our standards.

We're currently working on the following to assess and manage risk more effectively:

- Updating our risk assessment for vulnerable workers across our operation.

Measuring Performance and Progress

We have used Stronger Together's "Employer Good Practice Implementation Checklist" as a basis to monitor our progress and drive actions to improve. We have currently achieved 54% of

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the checklist actions. The steps we're working on to improve further are captured in an action plan, and are described in the relevant sections of this statement. We review our progress at least once a year.

We're currently working on the following to measure our progress more effectively:

- Assess strategic progress using Stronger Together online Progress Reporting Tool (PRT)

Reporting Issues

We have an open culture of feedback and anyone can raise a grievance or an issue to any manager within the business and expect to be heard fairly and in confidence. We perform an anonymous company-wide survey at least once a year for all salaried members of our team. We survey all our production staff (temporary and permanent) anonymously once a year. We seek feedback from our suppliers on our performance via a questionnaire.

If a team member, or person not employed by us, has any concerns about suspected modern slavery associated with Tails.com or an element of our supply chain, this may be reported by contacting our Head of People Operations, or Operations Director, in confidence.

We also have a confidential non-compliance reporting system, SpeakUp, where any team member can raise concerns anonymously and these will be independently followed up.

Tails.com has a remediation policy, which provides a practical framework for our internal team and supplier partners for how to act, and how to safeguard and provide remedy for the victim, should a case of modern slavery be found.

We're currently working on the following to improve our reporting of issues:

- Ensure all our suppliers have a robust grievance procedure, which is independent, anonymous and accessible to all workers.

Endorsement

Ultimate responsibility for the prevention of modern slavery rests with our leadership team. This statement has been approved by our board of directors.

If you would like to share any feedback on this statement, please email hello@tails.com.

Paolo Woods-Wyatt
CEO of Tails.com
30th May 2025