

Environmental Policy

April 2018

If there are any questions in relation to this Policy, please refer to the Company Secretary.

Environmental Policy

Greencross Ltd and its subsidiaries (the Company)

1. Introduction and Purpose

1.1 Background

The Company is committed to promoting and supporting a culture of environmental protection and sustainability. The Company's reputation as an ethical business organisation is important to its ongoing success. The Company expects all Employees to be familiar with and have a personal commitment to meeting these standards.

1.2 Purpose

The purpose of this Environmental Policy (**Policy**) is to:

- (a) set the minimum level of controls required across the Company to protect the natural environment and promote the sustainability of the natural environment; and
- (b) outline the Policy principles to be adhered to across the Company.

1.3 Definitions

Capitalised terms used in this Policy have the following meanings:

Company means Greencross Ltd and its subsidiaries.

Employees include any director, secretary, officer, employee, secondee or contractor of the Company.

Environment means the physical, biological and social aspects and conditions of a particular area, including:

- (a) land, water, air, atmosphere, climate, living organisms and other matter, things made or altered by humans, ecosystems and social groupings;
- (b) the social, economic and cultural aspects of a thing specified in paragraph (a); and
- (c) the interaction of any 2 or more things specified in paragraphs (a) and (b).

Environmental Risk means a material risk to the Environment that is both obvious to a reasonable person and that can reasonably be considered by that person to be controllable.

Executive means the senior executives of the Company from time to time, including:

- (a) Chief Operating Officer, Retail;
- (b) Chief Operating Officer, Veterinary Services;
- (c) Chief Operating Officer, Business Development;
- (d) Chief Merchant;
- (e) Chief Veterinary Officer;
- (f) Chief Financial Officer;

- (g) Chief Human Resources Officer; and
- (h) General Counsel & Company Secretary.

2. Scope

This Policy applies to each business unit of the Company and all Employees.

3. Policy

3.1 Principles

Each business unit of the Company must implement procedures and controls that incorporate the following principles either expressly, or through specific operational requirements:

- (a) as a minimum standard, compliance with environmental law, regulatory requirements, environmental licence conditions and industry best practice; and
- (b) a commitment to operate the Company's businesses sustainably to the extent reasonably possible having regard to all prevailing factors (including the Company's financial budget and capacity) by:
 - (i) promoting environmental awareness and sustainability principles throughout the Company;
 - (ii) reducing the amount of waste material produced and recycling all waste material possible;
 - (iii) identifying, mitigating, managing and reporting to the immediate Executive on the Environmental Risks and impacts associated with the business unit's activities;
 - (iv) planning and implementing strategies to effectively manage and reduce Environmental Risks and impacts across the business unit, such as greenhouse gas emissions, water management and waste reduction;
 - (v) where relevant, protecting natural systems and associated biodiversity in the regions in which the business unit operates its businesses;
 - (vi) where practical, supporting the use of materials that are safe, recycled or reused, have low embodied energy and have a reduced impact on resource depletion;
 - (vii) requiring suppliers to comply with environmental laws and considering the environmental performance of potential suppliers (including the manner in which they manage Environmental Risks) as a factor in sourcing decisions; and
 - (viii) encouraging environmentally responsible actions and behaviours among the business unit's customers and stakeholders.

3.2 Reporting

Each business unit must report all Environmental Risks to the Executive with responsibility for the business unit or Company Secretary for investigation.

3.3 Handling of reports

All reports in respect of Environmental Risks will be investigated by the relevant Executive or Company Secretary, as appropriate, on a timely basis. Appropriate corrective action and disclosure will be taken as warranted by the investigation.

4. Other matters

4.1 Amendment of policy

This Policy can only be amended with the approval of the Chief Executive Officer or the Board.

4.2 Adoption of Policy and Company review

This Policy was adopted with effect from 18 April 2018.

The Company will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.