



## **Human Rights & Modern Slavery Statements**

Central Garden & Pet Company (“Central”) is a leading manufacturer and distributor of pet and lawn & garden products, primarily in the United States but internationally as well. Central’s headquarters is in Walnut Creek, California, and it has subsidiaries and business units across the United States and in the United Kingdom. Our supply chain is located primarily within the United States but also has a significant number of international vendors. This Statement is made in compliance with the California Transparency in Supply Chain’s Act and the United Kingdom Modern Slavery Act of 2015.

Central has always sought to operate its business operations so as to respect and further the interests of consumers, customers and the public at large. Our intent is to accomplish this not only through the products we make and sell but also through the processes and relationships that help create these products.

We believe that there are no circumstances under which it would be acceptable for human slavery to exist or for forced or trafficked labor to be used in the production of any of our products. Central, both for itself and for all of its subsidiaries and business units, has adopted a formal Policy Against Human Trafficking and Slavery. This policy, and the steps taken to implement and enforce it, reflect our commitment to acting ethically and diligently throughout our supply chain and across our Company.

Central has implemented a variety of actions to ensure and verify the absence of forced labor, human trafficking, and slavery in its supply chain.

### **Verification and Risk Assessment**

Central takes care to ensure that it is selecting vendors that will act in accordance with Central’s ethical standards and its Policy Against Human Trafficking and Slavery. Where possible, we build long-standing relationships with our suppliers that facilitate more in-depth knowledge of their business and employment practices and reputation and their awareness of our expectations of ethical behavior. Central’s assessment process includes questionnaires and factory evaluation procedures directed at practices that could implicate issues relevant to human trafficking and slavery or forced labor conditions. As to some parts of our business that procure a greater share of products from international suppliers, Central provides vendors with a Supplier Handbook’s and Supplier Agreements that expressly set forth the Company’s position against the use of forced labor and contractually prohibit such conduct by suppliers.

### **Audits**



We have retained a third-party inspection company to conduct inspections of selected factories that provide us with products or components in order to further assist us in monitoring vendor compliance with human trafficking, and slavery prohibitions. In many cases, inspection and supplier audit practices are done in partnership with our major customers that impose complementary social responsibility obligations on suppliers. Consequences of failing to meet audit standards or to otherwise comply with the Company's policies and requirements can include remedial actions, financial penalties or suspension or termination of the business relationship.

### **Internal Accountability and Training**

Central maintains internal standards and procedures making its employees accountable for meeting company requirements relevant to human trafficking and slavery issues. We also provide company employees with training regarding both the legal requirements applicable to human trafficking and slavery issues and how those requirements impact supply side management. Such training is especially directed at employees and managers who have supply chain responsibilities, particularly overseas, and includes topics relevant to both recognition and mitigation of risks relevant to human trafficking and slavery issues.

### **Further and Ongoing Actions**

As the Company's supply chain evolves and circumstances change, Central intends to adopt and supplement its effort to assess and prohibit forced labor and human trafficking. These further efforts will include direct communication of Central's expectations and policies to key vendors and ongoing supplier engagement and awareness efforts. Central will be referencing its policy against Human Trafficking and Slavery as part of the terms and conditions that are included in purchase orders. To assess the effectiveness of the measures and all of the steps described in this Statement, we will also ensure that performance reviews for relevant supply chain and management personnel includes consideration of actions taken to enforce and strengthen supply chain verification and auditing, internal training, and risk identification and mitigation.

*This Statement was approved by Central's Board of Directors on August 17, 2016.*