

## **A PLACE FOR ROVER, INC.**

### **MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

#### **FOR FINANCIAL YEAR ENDED 31 DECEMBER 2024**

At A Place for Rover, Inc. ("**Rover**"), we are committed to ensuring that no form of modern slavery or human trafficking is allowed to subsist in any part of our business or supply chain. As part of that commitment, we have implemented business standards and values which are intended to foster a work environment that upholds the highest standards of business behavior. Not only do we expect our teams to adhere to these standards, we also expect those with whom we work, and particularly any suppliers to our business, to join us in committing to these standards.

#### **Our organisational structure and our business**

Rover connects dog and cat parents with loving pet sitters and dog walkers in neighborhoods across the United States, Canada, the United Kingdom and western Europe. Rover has a UK subsidiary, DogBuddy UK Ltd ("**DogBuddy**"), which provides certain services to Rover. The parent company of the group is Rover Group, Inc., with business operations run via Rover, headquartered in Seattle, Washington.

#### **Our staff**

Our employees are an integral part of the success of our organisation, and we are dedicated to maintaining a fair and ethical workplace for all of our employees. We prohibit the use of all forms of forced labour and any form of human trafficking and promote equal opportunities throughout the employment relationship. Given the nature of our business, the relatively small size of our workforce (including a de minimis number of DogBuddy employees in the UK), and the professional activities of our UK-based team, which works remotely, we have a low risk in these areas so far as our own team is concerned.

We ensure that our recruitment procedures and practices, as well as our remuneration of employees, complies with the relevant local laws, regulations and standards.

On occasions we may engage temporary contractors through an agency, but where we do this we carefully vet the agency and ensure that this method of engagement is used for appropriate short-term engagements only.

#### **Our supply chains**

Given the nature of our business we have a relatively short supply chain. Our principal supplies come from providers of professional services such as technology/cloud services, legal services, accounting services, financial services, advertising services, and companies which supply us with hardware and office equipment. We also use sub-contractors to provide business support services as needed.

#### **Due diligence**

We expect all our contractors, suppliers and other business partners to uphold the same high standards as we do, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment.

We work to identify, assess, and monitor any potential areas of risk in relation to our business and supply chains. This includes considering the length of the relationship, the nature of what is being supplied and the location from where it is being supplied. We will continue to look to manage any risks identified.

## **Assessing and managing risk**

We are conscious that assessing and managing risk is an ongoing obligation, and there are several steps we have taken, and continue to take, as we strive to achieve this:

### *Vendor Code of Conduct*

As part of cementing the standards we require of our suppliers, we require that they all abide by the terms of a Vendor Code of Conduct ("**Vendor Code**").

We have implemented the Vendor Code to set out how we expect those who conduct business with Rover to behave. Rover expects vendors to communicate the content of the Vendor Code to its own representatives to ensure that they understand and comply with it.

The Vendor Code makes clear that Rover is committed to fostering and maintaining the highest ethical standards in each jurisdiction in which it conducts business. As a condition of doing business with Rover, we expect our vendors and their representatives to share and embrace these values and commitments.

We updated our Vendor Code in 2024 to expressly prohibit the use of all forms of forced, child, or involuntary labor and any form of human trafficking in the operations of Rover's suppliers and vendors. Additionally, it is an express obligation of the Vendor Code that all vendors refrain from illegal conduct and comply with applicable laws, rules and regulations when carrying out responsibilities on behalf of Rover. This includes in relation to their engagement with employees, contractors and their own suppliers, including fair employment and anti-discrimination laws. Any vendor that fails to comply with the Vendor Code will be subject to review and possible termination of their ongoing relationship with Rover. In this regard, Rover would treat any instance of modern slavery as grounds for the summary termination of any vendor contract.

### *Code of Business Conduct and Ethics*

We also have in place a Code of Business Conduct and Ethics ("**Code of Business Conduct**") which is designed to deter wrongdoing and promote, amongst other things, compliance with applicable laws, rules and regulations, a culture of honesty and accountability and honest and ethical conduct.

The Code of Business Conduct applies to all directors, officers and employees of Rover and its subsidiaries and their contractors, consultants and agents. The Code of Business Conduct makes clear that all employees, contractors, consultants and agents must respect and obey applicable laws, rules and regulations when carrying out responsibilities on behalf of Rover and must refrain from illegal conduct. We updated our Code of Business Conduct in 2024 to expressly state that Rover has zero tolerance for any form of modern slavery and prohibits, both in its operations and those of its suppliers and vendors, the use of any forms of forced, child or involuntary labor and any form of human trafficking.

### *Reporting concerns*

Rover has mechanisms in place for any concerns about a failure to comply with the law to be reported and actioned promptly. This is included under its Vendor Code, its Code of Business Conduct and its Whistleblower Policy.

Rover requires all employees to report any concerns that there has been or may be a violation of any applicable laws or regulations to their manager, Rover's Compliance Officer or Human Resources. Rover also operates an anonymous reporting line (via a secure web portal and hotline) for the reporting of concerns or violations of any applicable laws or regulations. Rover is committed to promptly and thoroughly investigating reports raised. This provides a means for any concerned employee, contractor or vendor to raise issues in relation to compliance with the

Modern Slavery Act with Rover and be assured that their concerns will be appropriately addressed.

Each mechanism enables any affected person to bring to our attention concerns of potential legal violations so that they can be promptly considered and actioned. Any reports of modern slavery offences being committed anywhere within our business or supply chain would be addressed urgently and dealt with in the most serious of manners.

We assure all employees and contractors that their concerns will be taken seriously, treated confidentially and that no unlawful action will be taken against them as a result of speaking up.

There were no instances of slavery or human trafficking concerns raised to us during the financial year under review.

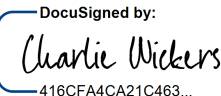
**Training**

Every new Rover employee is required to review and acknowledge our Code of Business Conduct, Whistleblower Policy, and certain other policies. We also conduct annual training on, and require annual acknowledgement of, our Code of Business Conduct, Whistleblower Policy, and certain other policies.

**Looking ahead**

During the financial year ending 31 December 2025 we will undertake further review of our policies and procedures to ensure they remain sufficient for the purposes of combatting modern slavery.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ended 31 December 2024 and has been approved by the board of directors of A Place for Rover, Inc.*

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Charlie Wickers, Director  
For and on behalf of A Place for Rover, Inc.  
May 5, 2025