

Modern Slavery Statement

Financial year ending 31 March 2024

1. Overview of business, reporting entities and structure

1.1. Business

Jarden is a leading investment and advisory group operating in Australia and New Zealand.

Jarden has a history of over 60 years in New Zealand and expanded to Australia in 2020.

In Australia, it has over 170 employees across its offices in Sydney and Melbourne.

Jarden operates four core businesses:

- **Corporate Finance;**
- **Institutional Equities;**
- **Research;** and
- **Fixed Income, Currency & Commodities.**

1.2. Reporting Entities

- Jarden Australia Holdings Pty Ltd (**JAHPL**); and
- Jarden Australia Pty Ltd (**JAPL**).

1.3. Structure

JAHPL is a proprietary company limited by shares, incorporated and domiciled in Australia. It is directly owned by its parent, Jarden Investments Limited. The ultimate parent is Jarden Group Limited. Both the parent and ultimate parent are incorporated and domiciled in New Zealand.

JAPL is a proprietary company limited by shares, incorporated and domiciled in Australia. It is directly owned by its parent, Jarden Australia Partners Pty Ltd. The ultimate parent in Australia is JAHPL.

JAPL is a holder of Australian Financial Services Licence and is regulated by agencies including the Australian Securities & Investments Commission, Australian Transaction Reports and Analysis Centre and Australian Securities Exchange.

2. Identifying modern slavery risks

As a financial services provider in Australia, we consider that there is very low risk of modern slavery practices in our ordinary operations.

We have not identified any instances of modern slavery but we recognise that Jarden may be indirectly exposed through its supply chains.

3. Assessing and mitigating modern slavery risks

3.1. Third party risk assessment

Jarden established a Third-Party Risk Management System to identify, assess and manage third-party risks.

3.2. Policies and guidelines

- **Appropriate Workplace Behaviour Policy** – Jarden actively promotes a culture of equal opportunity, meritocracy, fairness and equality. Our Appropriate Workplace Behaviour Policy and other People and Culture policies form the foundation of our commitment to respect and support human rights in the workplace.
- **Whistleblowing Policy** – Jarden is committed to maintaining a safe workplace that values equal opportunity and is free from discrimination, harassment and victimisation. The Whistleblowing Policy has been put in place to enable employees and other eligible persons to raise concerns regarding illegal or improper conduct in relation to Jarden,

without fear of reprisal or detrimental treatment. Jarden encourages staff to raise concerns and feel comfortable of speaking up.

- **Code of Conduct** – applies to all Jarden employees and sets out Jarden’s expected standards of behaviour, provides a framework for how employees should act in the workplace, and informs employees of their responsibilities with respect to confidentiality and privacy, personal trading, conflicts of interest and market trading activities.
- **Risk Management Framework** – encompasses the principles, policies, systems, structures, processes, and people who are responsible for identifying, measuring, evaluating, monitoring, reporting and controlling or mitigating all internal and external sources of material risks.
- **Anti-Bribery and Corruption Policy** – Jarden aims to ensure that we are not engaging in bribery and corruption.
- **AML/CTF Program** – Jarden maintains an AML/CTF program that comprehensively identifies and evaluates money laundering risks posed to its business. Jarden recognises that the prevention of money laundering and terrorism financing is a key component of mitigating modern slavery risks in our business.

3.3. Our supply chain

Jarden procures a variety of products and services with our principal suppliers in the following categories:

- technology infrastructure;
- software;
- office supplies and equipment;
- premises and associated services;
- banking and financial services;
- professional services;
- training services; and
- travel.

The categories with relatively higher risk of modern slavery are:

- technology infrastructure;
- software;
- office supplies and equipment; and
- premises and associated services.

These industries may engage lower or unskilled vulnerable groups, have weaker labour regulations, and/or involve the manufacture and sale of goods sourced from countries with high instances of modern slavery.

3.4. Onboarding new suppliers

As part of the Third-Party Risk Management System, Jarden undertakes due diligence on prospective service providers. The degree of due diligence is determined by the criticality of service, risk profile of a service provider and their products or services.

3.5. Client onboarding and ongoing monitoring

As part of risk-based compliance framework, Jarden screens its clients with the aim to ensure that Jarden does not conduct business with, on behalf of, or for the benefit of, countries, entities, or individuals that are subject to Sanctions Laws or controversies. Processes are in place to ensure appropriate actions are taken where a client subject to applicable Sanctions Laws or a controversy is identified. Clients identified as a high-risk are subject to heightened due diligence and require senior management sign-off before they can be on-boarded.

Jarden also updated its deal selection form to integrate enhanced client screening and ESG considerations.

3.6. Training

During the employee onboarding and induction process, Jarden offers a series of learning and development activities. These are designed to communicate and embed the Jarden culture and reinforce the ongoing importance of meeting behavioural expectations and managing conduct risk effectively across all of Jarden’s businesses.

Pursuant to the Training Policy, Jarden also provides regular training (including mandatory training) on our policies, procedures and guidelines. Jarden tracks staff completion of mandatory training to ensure compliance.

In 2024, Jarden’s training available to all staff included a module titled “preventing human trafficking”.

4. Ongoing plans

Jarden acknowledges that further work is required to better address modern slavery risks as its business continues to grow and mature.

We plan to enhance our due diligence framework to include questions about the supplier’s approach to modern slavery risks.

5. Assessing effectiveness of our actions

Jarden will seek to commence work to uplift policies, processes, and procedures to identify and monitor modern slavery risks in our operations and supply chains.

We will seek to review our actions related to modern slavery risks and address any improvement opportunities.

6. Consultation and approval

This statement was prepared with the assistance of, and in consultation with, a working group from relevant divisions.

The Executive Committee of the reporting entities were consulted and given the opportunity to provide feedback on this statement before it was considered and approved by each board of the reporting entities.

7. About this statement

This modern slavery statement sets out the steps we have taken to identify, mitigate and address the risks of modern slavery in our operations and supply chain.

This statement was prepared and issued by JAHPL on behalf of the reporting entities.

This statement is given pursuant to the *Australian Modern Slavery Act 2018* (Cth) and covers the period 1 April 2023 to 31 March 2024.



Aidan Allen

Director and Co-Chief Executive Officer

Jarden Australia Holdings Pty Ltd

Jarden Australia Pty Ltd



Sarah Rennie

Director and Co-Chief Executive Officer

Jarden Australia Holdings Pty Ltd

Jarden Australia Pty Ltd

Date: 23 September 2024