

Modern Slavery Statement

Zashvin Pty Ltd

This statement covers the activities of Zashvin Pty Ltd (ACN 010 980 015) (**Zashvin**) for the period of 1 July 2024 to 30 June 2025.

This statement has been prepared in accordance with the requirements in the *Modern Slavery Act 2018* (Cth) (**MS Act**) and sets out the actions Zashvin has taken, and will take, to assess and address modern slavery risks in our operations and supply chains.

A Modern Slavery Working Group was established within Zashvin this year. The objectives of the Modern Slavery Working Group are to ensure the establishment and implementation of a Modern Slavery Policy, to educate our employees and supply chain to assist us to address the modern slavery risks associated with our operations and supply chain, and to measure our management of modern slavery risks against identified metrics.

About us

Our operations

Established in 1989, Zashvin is a privately-owned company based in Brisbane, Australia.

Zashvin is a majority shareholder in Jellinbah Group Pty Ltd (**Jellinbah**).

In addition, Zashvin is involved in investment and real estate activities, including leasing and management of office and retail premises.

Our business activities are supported by a small number of staff engaged through a range of generally long-term service relationships that we have in place. The number of staff will vary depending on the activities being undertaken by Zashvin at any one time.

Our commitments

Zashvin recognises that respecting the human rights of those impacted by our business activities is of the utmost importance. Zashvin takes seriously its responsibilities regarding international labour and human rights standards.

Zashvin is focussed on fostering meaningful partnerships and conducting business according to the highest ethical and performance standards.

We make this Statement as a commitment to reducing the risks of Modern Slavery, as that term is defined under the MS Act.

Modern slavery risks

During this reporting period, we have undertaken assessments of modern slavery risks in our operations and supply chains. We based these assessments on a range of matters, including where supply chain participants are based (both within Australia and outside of Australia) and contracting models.

Overall, our operations and supply chain have a low potential for modern slavery risks. Our risk profile is summarised in the table below.

Stakeholder	Risk assessment
Jellinbah	Low Jellinbah, as a reporting entity, is subject to the MS Act. Its actions to monitor and address modern slavery risks are set out in its own annual statement.

Stakeholder	Risk assessment
	<p>Further, a large number of its employees have the benefit of being represented by sophisticated industrial associations and are covered by an enterprise agreement approved by the Fair Work Commission.</p> <p>Zashvin has and will continue to liaise with Jellinbah to seek evidence of how the company manages the modern slavery risks in its supply chain.</p>
Australia and New Zealand Banking Group Limited	<p>Low</p> <p>A large portion of Zashvin's investment activities are engaged through Australia and New Zealand Banking Group Limited. Zashvin understands that ANZ Group Holdings Limited and its subsidiaries, as reporting entities under the MS Act, have reported on the measures they have taken to identify, assess and manage modern slavery since the first financial year that the MS Act came into effect.</p> <p>Zashvin has and will continue to liaise with Australia and New Zealand Banking Group Limited to seek evidence of how the company manages the modern slavery risks in their supply chain.</p>
Cleaning services	<p>Low</p> <p>Zashvin has a long-standing relationship with a small, locally-owned business who provides cleaning services for three real estate properties operated by Zashvin in Brisbane.</p> <p>During the next reporting period, we will engage with the cleaning services provider to discuss key modern slavery risks and ensure their workforce receive fair conditions, pay and treatment.</p>
Professional services	<p>Low</p> <p>Zashvin may engage professional services from a range of Australian based providers from time to time in relation to information technology, insurance and legal services. We do not typically engage any professional services outside of Australia.</p>

Actions to assess and address risk

Policies and procedures

During the reporting period, Zashvin developed a Modern Slavery Policy. The purpose of this Modern Slavery Policy is to:

- minimise or eradicate Modern Slavery risks;
- set out the responsibilities of Zashvin, our personnel, operations and suppliers in observing and upholding our position on Modern Slavery; and
- provide information and guidance to our personnel on how to recognise and deal with Modern Slavery issues.

Engagement with stakeholders

Zashvin endeavours to ensure that we, and our personnel, comply with all Modern Slavery laws, within our operations, activities and supply chains. During the reporting period, we have engaged with our key stakeholders, as set out above, to highlight and mitigate the risk of modern slavery in our operations.

During the next reporting period, we will continue to monitor these risks.

Modern Slavery Working Group

During this reporting period our Modern Slavery Working Group was established and conducted its first meeting for the purposes of considering the modern slavery risks in our operations and supply chain. This Group has executive financial and in-house legal representation which will provide information to the Board and Chief Executive in relation to modern slavery where necessary.

Among other things, the Group is also responsible for assisting the business to ensure that it continues to manage the risks identified in this statement and for identifying any additional steps that might be taken to monitor the compliance of our supply chain partners.

During the next reporting period, Zashvin is committed to ensuring the risk of modern slavery is effectively managed and this includes maintaining the systems and commitments we have created this year.

To action this commitment the Zashvin's Modern Slavery Working Group will review:

- **Modern Slavery Policy** – to confirm that it is being effectively implemented.
- **Contracts** – to consider the inclusion of a modern slavery clause in new service and supply contracts, where needed.
- **Geographic and industry trends** – to identify any known 'hot spots' which have a high risk of modern slavery practices.

Measuring our success

In the next reporting period, our goals are as follows:

- Our Modern Slavery Working Group will meet bi-annually to support the business to identify and manage modern slavery risks.
- We will continue to liaise with our supply chain partners and review contractual arrangements for modern slavery compliance.
- We will continue to implement our Modern Slavery Policy.
- We will educate our staff, when relevant, in relation to modern slavery risks.
- We will continue to review metrics to assist us to assess the impact of our modern slavery risk management to enable us to measure our success.
- We will continue to raise modern slavery at meetings with our supply chain partners, when relevant.

This statement was approved by the Board of Directors of Zashvin, in its capacity as principal governing body of Zashvin, on 30 October 2025.



Paul Perng Jyh Chong
Director