

# **Modern Slavery Statement**

**ZENTREE HOLDINGS LTD.**

**1 July 2022 to 30 June 2023**

**Reporting Entity Legal Name: Zentree Holdings Ltd.**

**Financial Reporting Year: 2023**

**Identification of a Revised Report: N/A**

**Business Number(s): 13331 3692 RC0001**

**Identification of Reporting Obligations in Other Jurisdictions: N/A**

**Entity Categorization according to the Act: Investment and Holding Company**

**Sector/Industry: Various (Investment, Real Estate, Leasing & Private Liquor Stores)**

**Location: Canada**

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**Introduction:** Zentree Holdings Ltd. is committed to upholding human rights and ethical business practices across its operations and supply chains. As a responsible corporate entity, we recognize the importance of addressing and mitigating the risks of forced labor and child labor within our sphere of influence. This Modern Slavery Statement outlines the steps we have taken during the previous financial year to prevent and reduce these risks and ensure compliance with the applicable regulations.

## **Zentree Holdings Mission Vision and Values**

### **Mission**

At Zentree Holdings, our mission is to deliver exceptional service & value in all services we provide.

### **Vision**

We aspire to become a best in class diverse and investment corporation.

### **Core Values**

- **Customer Focus:** Our customers are at the heart of everything we do. We strive to not only meet but exceed their expectations.
- **Community Engagement:** We are committed to giving back to the community and supporting it in every way possible.
- **Sustainable Growth:** We are dedicated to the sustainable growth of our business, operating professionally and efficiently.

- **People-Centric Approach:** We believe in having the right people in the right positions, ensuring they work in a safe and enjoyable environment. We provide our staff with security and opportunities for career advancement.
- **Safety and Compliance:** We prioritize the safety of our customers, staff, and suppliers, adhering to all legislative requirements.
- **Long-Term Supplier Relationships:** We value enduring relationships with our suppliers, understanding that they contribute significantly to our success.

At Zentree Holdings, we are committed to upholding ethical standards in all aspects of our operations and supply chains. We are opposed to all forms of modern slavery and are dedicated to addressing any associated risks. We recognize that continuous improvement is essential in this regard.

## 1. Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

Zentree Holdings Ltd. acknowledges the importance of preventing and reducing the risks of forced labor and child labor within its operations and supply chains. During the financial year Ending June 30, 2023, the company implemented the following measures:

- Creating and enforcing rules that clearly state no forced labor or child labor is allowed.
- Regular assessments by managers to identify any possible cases of forced labor or child labor in our supply chain and making sure these rules are followed by all members of our team.
- Implemented due diligence processes to assess suppliers' compliance with labor standards and regulations.
- Provided training sessions to employees across subsidiaries to raise awareness about the risks of forced labor and child labor and to ensure adherence to company policies.

In the private liquor store business, which is subjected to government regulations, we rigorously verify the age of individuals entering our premises. Our employees diligently check identification for anyone they encounter, whether it be a supplier or a customer, to ensure that individuals handling liquor products are not minors.

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## 2. Structure, Activities, and Supply Chains

### **Zentree Holdings Ltd.**

- Legal Structure: Corporation
- Organizational Structure: Holding Company
- Number of Employees:  
Zentree Holdings: 4 Employees (Head office)  
Subsidiary companies: 75 Employees
- Locations of Operation: Canada

### **Organizational Structure**

Zentree Holdings Ltd. serves as an investment and holding company, overseeing several entities:

- Paul Esposito Developments Ltd.: Formerly engaged in project management and general contracting services.
- Liquor For Less Stores Ltd.: Protects the name of Liquor for Less, operating under Paul Esposito's Restaurant (Abbotsford) Ltd.
- Red Valley Enterprises Ltd.: Owns land and a commercial mall, including 100% shareholder of 671690 BC Inc.
- 671690 BC Inc.: The beneficiary owner of a commercial mall through a trust agreement with Red Valley Enterprises Ltd.
- Paul Esposito's Restaurant (Abbotsford) Ltd.: Ownes and operates a chain of six private liquor stores "LIQUORFORLESS.COM" in British Columbia, regulated by the Liquor Control Licensing Act of British Columbia.

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## 3. Policies and Due Diligence Processes

Zentree Holdings Ltd. has established robust policies and due diligence processes regarding forced labor and child labor. These include:

- Embedding responsible business conduct (RBC) into corporate policies and management systems.

- Ceasing, preventing, or mitigating adverse impacts through proactive measures.
  - Tracking implementation and results of due diligence processes.
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## 4. Forced Labor and Child Labor Risks

Zentree Holdings Ltd. acknowledges the potential risks of forced labor and child labor within our activities and supply chains. While we strive to maintain ethical standards, we recognize the need for ongoing vigilance and proactive measures to address these risks effectively.

Our risk assessment processes consider:

- The nature and scope of our operations and supply chains.
- The geographic locations and sectors in which we operate.
- The activities of our subsidiary entities and business partners.
- The potential vulnerabilities within our supply chains.

We remain committed to identifying, assessing, and managing forced labor and child labor risks through continuous improvement and collaboration with relevant stakeholders.

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## 5. Remediation Measures

In the event that forced labor or child labor risks are identified, Zentree Holdings Ltd. and its subsidiaries are committed to implementing remediation measures to address any adverse impacts. These measures may include:

- Providing support and assistance to affected individuals and communities.
- Collaborating with suppliers to implement corrective actions and prevent future occurrences.
- Engaging with relevant authorities and stakeholders to ensure accountability and transparency.

Our approach to remediation emphasizes respect for human rights and dignity, guided by internationally recognized principles and standards.

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## 6. Remediation of Loss of Income

Zentree Holdings Ltd. recognizes the potential impact of our initiatives on vulnerable families and communities. We are committed to mitigating any unintended consequences that may result in loss of income or livelihoods.

Our remediation efforts focus on:

- Supporting vulnerable families through targeted interventions and assistance programs.
- Collaborating with local organizations and community leaders to address socio-economic challenges.
- Monitoring and evaluating the effectiveness of our remediation measures to ensure positive outcomes.

We remain dedicated to promoting sustainable development and inclusive growth across our operations and supply chains.

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## 7. Training

Zentree Holdings Ltd. provides comprehensive training to employees on recognizing, preventing, and addressing forced labor and child labor issues. Our training programs cover:

- The identification of forced labor and child labor indicators.
- Reporting mechanisms and escalation procedures.
- Ethical principles and responsible business conduct.
- Compliance with relevant laws, regulations, and standards.

We are committed to fostering a culture of awareness, accountability, and integrity throughout our organization and among our stakeholders.

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## 8. Assessing Effectiveness

Zentree Holdings Ltd. regularly assesses the effectiveness of its measures to prevent and reduce the risks of forced labor and child labor within its activities and supply chains. Our assessment processes include:

- Monitoring key performance indicators and benchmarks.

- Soliciting feedback from employees, suppliers, and other stakeholders.
- Benchmarking against industry best practices and standards.

We remain committed to continuous improvement and transparency in our efforts to combat forced labor and child labor.

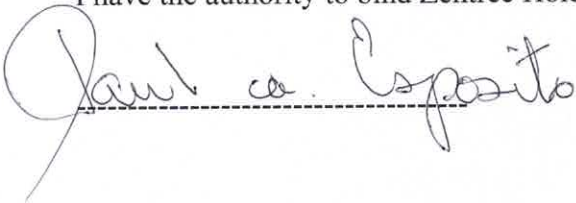
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## Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

Full name Paul Angelo Esposito  
Title Owner / President  
Date May 15, 2024

I have the authority to bind Zentree Holdings Ltd.

A handwritten signature in cursive script, reading "Paul Angelo Esposito", written over a horizontal dashed line.