

# SHANEEL ENTERPRISES LIMITED

## Modern Slavery Act

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR 2021/2021**

#### INTRODUCTION

Shaneel Enterprises Limited (“Shaneel”) and its group companies (including S A Designer Parfums Limited – “SADP”) have a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity at all times. We have evaluated our business dealings and relationships and assessed the level of visibility which we have in relation to operations throughout our supply chain. We are committed to improving our company’s practices to ensure we are certain that slavery and human trafficking is eradicated from our supply chain.

#### ORGANISATION'S STRUCTURE

We are an international distributor of branded fragrances and cosmetics.

Shaneel and SADP are based in Watford, United Kingdom and forms a part of the Shaneel Enterprises Group.

As at the financial year ending 31 March 2021, the Shaneel Enterprises Group had 156 employees in the UK and worked with third parties both within and outside the UK in relation to the manufacturing and distribution of our business’ products.

#### OUR SUPPLY CHAINS

Our supply chains draw on suppliers of componentry, finished goods, and filling and packing operations.

For the year 2020/21 supplies for the Shaneel Group were sourced from suppliers in the UK, European Union, Mexico, the USA, China and from a single supplier in the UAE. The majority of our relationships have been established over a number of years. As and when we take on new suppliers we select them through a combination of due diligence enquiries relating to their known performance, regulatory compliance, accreditations through recognised organisations and schemes, and references/recommendations from other suppliers and/or trusted third parties.

To date we are not aware of any slavery or human trafficking issues within our supply chain and, in the event we do become aware, we will act immediately in accordance with our legal and moral obligations.

#### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

The Shaneel Enterprises Group has an Anti-Slavery and Human Trafficking Policy in place which applies in full to our suppliers. The Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

In 2020/21 we continued putting in place formal systems, in addition to reviewing and updating those already in place, to:

- Identify and assess potential risk areas in our supply chains;
- reduce the risk of slavery and human trafficking occurring in our supply chains;
- protect whistle blowers.

## SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to modern slavery and human trafficking.

To ensure all those in our supply chain comply with our values we have reviewed contracts with suppliers and distributors to consider contractual obligations in addition to statutory obligations. We have inserted new contractual obligations in our supply agreements, procurement contracts, and distribution agreements to bring about compliance with the Modern Slavery Act 2015.

Representatives from each department provide an overview to the Managing Director of the suppliers of goods and services to their department and regularly monitor for any signs of modern slavery and human trafficking in the supply chain serving them. In the event an issue relating to modern slavery and/or human trafficking is identified it will be notified to the Managing Director and an investigation will be opened.

In 2020/21 we did not purchase (directly or indirectly) from any supplier found to be breaching our Anti-Slavery and Human Trafficking Policy.

In seeking to ensure that modern slavery does not take place within the supply chains procured and utilised by Shaneel and SADP, steps taken continue to include: -

- Before we create contracts with new suppliers, we undertake an auditing process, where we ask suppliers if their employees are lawfully employed and not detained against their will.
- Ensuring that all suppliers to Shaneel and SADP are committed to abolishing modern slavery and checking their modern slavery statements where appropriate.
- Not entering into contracts and if necessary withdrawing from an existing contract, if an organisation does not confirm their commitment to abolishing modern slavery.
- Where practicable, only doing business with suppliers who have their own modern slavery transparency statements (excluding commercial organisations whose turnover is below that which triggers compliance), who enter into contractual warranties and who are willing to provide compliance and audit information.
- Including wherever practicable in new contracts the right to terminate for breach of the Act.
- Due diligence activities in relation to existing strategic suppliers which will continue during annual business reviews to ensure that our suppliers regularly review and map their supply chain to identify and mitigate potential modern slavery risks related to their business.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the financial year ending 31 March 2021.

This statement was written by Georgina Crowhurst, Senior Legal Counsel of Shaneel and approved by the Board of Shaneel Enterprises Limited on 23 September 2021.