

## SHANEEL MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR 2024/2025

### INTRODUCTION

Shaneel Enterprises Limited and its group companies (together the “Shaneel Group”) have a zero-tolerance approach to modern slavery and human trafficking. 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 that we have in relation to operations throughout our supply chain.

This is our Modern Slavery Statement. It has been prepared by the Shaneel Legal Department in accordance with section 54(1) of the Modern Slavery Act 2015 (the “Act”) in respect of our financial year from 1 April 2024 to 31 March 2025 (“FY24/25”). This statement, as well as Shaneel Group’s Anti-Slavery and Human Trafficking Policy (the “Modern Slavery Policy”), cover all of our group companies (including S A DESIGNER PARFUMS LIMITED) and set out the steps we take to prevent modern slavery from occurring within our business or our supply chains. Our purpose is to build a better working world, which includes a commitment to conduct our business ethically and to deliver responsible growth that is inclusive for all.

### ABOUT US

Shaneel Enterprises Limited is incorporated in England and Wales and based in Watford, Hertfordshire, United Kingdom. We are primarily based in the UK, but our companies also operate in Germany, Malta, France and Spain. Companies within the Shaneel Group manufacture, distribute and promote branded fragrances and cosmetic products. Our portfolio of brands includes names such as Jennifer Lopez, Playboy, Cerruti, Ghost, Ariana Grande and Hawaiian Tropic.

As of the financial year ending 31 March 2025, Shaneel Group had less than 250 employees in the UK and worked with third parties both within and outside the UK in relation to the manufacturing and distribution of our products.

### KEY TEAMS

We undertake a variety of different initiatives within our own business and supply chains, making sure that we are working together with our staff and suppliers to eliminate modern slavery and human trafficking. Some of our key teams involved in ensuring compliance include:

**HR** – Our HR department ensures that we comply with all applicable laws and regulations (including the Act) during both the recruitment and the employment of our employees and associates. HR work closely with our external recruitment service providers to carry out pre-employment checks (see below for details). The HR department also works with our Legal team to investigate any issues raised involving our staff.

**NPD & Operations** – Our New Product Development (“NPD”) and Operations teams source the suppliers for fragrances, oils, componentry, finished goods, filling services and packing materials. They ensure that due diligence checks are carried out on both new and existing suppliers and that all suppliers engaged by our companies comply with all applicable laws pertaining to modern slavery and human trafficking.

**Legal** – Our Legal team advises other internal departments on procurement matters and work to ensure that robust terms are in place with our suppliers, covering their obligations and required practices when providing services to companies in the Shaneel Group. They also advise our HR department and other internal departments on employment and modern slavery matters. The Legal team also carries out an annual review of our Modern Slavery Policy and associated procedures and prepares the required Modern Slavery statements.

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

## MANAGING RISKS WITHIN OUR BUSINESS

In addition to contract manufacturing, we operate mainly in the fragrance wholesale and distribution sector, which is not deemed to be a higher risk industry for modern slavery practices. However, we also engage manufacturers and suppliers for goods and components from various countries around the world (some of which have been classified as areas of higher risk for modern slavery), therefore we must be mindful of the possible risks and implement appropriate measures to combat these.

### Recruitment of staff

As part of our recruitment process for employees and consultants, we carry out checks prior to any person joining a company in the Shaneel Group. Our HR department looks for potential red flags for modern slavery and follow up on any irregularities which may indicate that there is an issue. The pre-screening of individuals includes identity checks, reference checks, right to work checks, and where applicable education and professional qualification checks.

Our HR department also works closely with our Legal team to ensure that our recruitment and screening practices are fit for purpose and that any instances of modern slavery are identified, reported and appropriate action taken.

### Fair pay for staff

We are committed to ensuring that all of our employees and consultants are paid fairly. We ensure that all of our employees in the UK are paid at least the national Minimum Wage.

### Acquisition due diligence

Our Legal, commercial and finance teams perform due diligence checks for any target entity that Shaneel Group is considering purchasing or investing in. This includes assessing modern slavery risks in the target, its suppliers, and its business relationships.

### Policies

Our Modern Slavery Policy applies to all our employees and associates and provides guidance to help staff understand what modern slavery is, areas where it is a particular risk and how to report any suspicions that modern slavery may be taking place.

## MANAGING RISKS WITHIN OUR SUPPLY CHAINS

Our supply chains include suppliers of fragrances, oils, componentry, finished goods, filling and packing operations. We are focused on working with long-term, strategic partners who demonstrate the same commitment to socially and environmentally sustainable procurement as us, in order to ensure that modern slavery plays no part in their business.

We have an extensive supply chain, which covers a wide range of products and services across multiple suppliers. For FY24/25 Shaneel Group's suppliers included companies in the UK, European Union, Switzerland, Mexico, USA, China and the UAE. The majority of our relationships have been established over a number of years.

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 (such as SEDEX), and references/recommendations from other suppliers and/or trusted third parties. Where practicable, we make efforts to only do 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.

We continually evaluate how to identify and address risks in each category of our supply chain, including those related to modern slavery and human trafficking. To map and mitigate risk, we ensure that we have appropriate policies and contractual terms in place, so that our suppliers understand the standards that we require of them.

#### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Shaneel Group has an Anti-Slavery and Human Trafficking Policy in place which applies in full to our suppliers. The Modern Slavery 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.

#### OUR SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct (the “Code”) sets out clear standards of business conduct and ethics that we require our suppliers to abide by. Our Code covers areas such as human rights, labour standards and social sustainability (in particular, health and safety, working hours and working conditions, including paying fair compensation). We require that all employment should be freely chosen by the worker and there should be no use of forced labour or any form of child labour. We also make it clear that our suppliers are expected to maintain an active view on the inherent risks of modern slavery in their own supply chain and that our recruitment agencies and brokers are required to carry out appropriate due diligence and ongoing management to ensure that the risk of worker exploitation is mitigated. Our suppliers are required to adhere to the Code (or equivalent standards) and where possible the Code is incorporated into our terms with the supplier.

#### SUPPLIER ADHERENCE TO OUR VALUES

The obligations set out in our Code are strengthened by our supplier and manufacturing agreements, which provide our companies with the right to immediately terminate agreements by written notice to a supplier in specified circumstances, including any breach of any applicable law (including the Act) or a material breach of the supplier agreement.

#### DEVELOPMENTS IN FY24/25

In June 2024 we became aware of a potential child labour issue in our supply chains when the subcontractors of some of our fragrance house suppliers received adverse publicity stating that some of them were using child labour during the sourcing of ingredients for their products. The media report concerned jasmine farms in Egypt - a source of jasmine flowers which are used in various fragrance products. It was reported that some of the workers who were harvesting the jasmine flowers were being helped by their children.

In response, we immediately contacted all relevant suppliers and requested that they look at their supply chains to check what was happening and provide us with an update. We received confirmations that steps are being taken to ensure that similar situations will not occur in the future.

In particular, the suppliers have pledged to:

- a) Carry out independent reviews with the help of third-party experts and implement human rights due diligence programs across their supply chains;
- b) Develop comprehensive work plans in collaboration with their suppliers;
- c) Carry out field visits in order to engage with local suppliers and carry out training;
- d) Identify opportunities for improvement and define Key Performance Indicators for tracking progress across their supply chains;
- e) Take further action required in order to implement change and eliminate child labour from their supply chains.

Some of our suppliers have also become part of international industry-wide initiatives which aim to educate suppliers and business partners, strengthen child protection measures and improve the due diligence systems for detecting and preventing child labour. The initiatives work with labour organisations (including the International Labour Organization) to promote fair compensation for workers and improve the economic resilience of families.

#### OUR KEY AIMS FOR FY25/26:

We strive to continually improve our systems and policies that mitigate the risks of modern slavery and human trafficking taking place in our business and supply chains. Therefore, set out below are our aims for next year.

1. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we plan to carry out training to staff and senior management.
2. We plan to carry out a due diligence business review of our existing suppliers to ensure that our suppliers regularly review and map their supply chain to identify and mitigate potential modern slavery risks related to their business. If any areas of high risk are identified within the supply chain, we will perform further checks and audits and take necessary steps to ensure compliance.
3. Our Legal team will be reviewing and updating as required our Modern Slavery policy along with any associated guidance (including a modern slavery response plan for any identified risks in our internal and supplier assessment processes).
4. We will review our internal hiring practices and procedures and ensure that they are all in line with the Act as well as any other applicable laws.

This statement was approved by the Board of Shaneel Enterprises Limited on 30 September 2025.