

Sarah FETISH Stern

PENROSE TRADING in respect of SARAHFETISHSTERN.COM
(the “Company”)

Anti-Slavery and Human Trafficking Statement

INTRODUCTION FROM THE COMPANY

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our employees and representatives are alert to the risks and are expected to report their concerns, and management are expected to act upon them.

ORGANISATION'S STRUCTURE

PENROSE TRADING, is an independent company operating in the adult entertainment industry. We are based in Malaga, Spain.

OUR BUSINESS

The principal activity of our business is the creation of spanking and fetish orientated video content within the adult entertainment industry.

OUR SUPPLY CHAINS

Our supply chains, where outsourced, include the sourcing of video filmmakers, recruitment of freelance models and individual performers predominately from UK based suppliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-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.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we:

- Build effective and long-standing relationships with freelance model and performer network and make clear our expectations of business behaviour;

- Have a policy of “knowing who we do business with” to ensure that we are contracting with appropriate businesses;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt ‘one-up’ due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

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 briefings to our management, any staff and freelance models and performers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of any audits where necessary by qualified staff;
- Use of staff monitoring and payroll systems, adhering to appropriate guidelines; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

PK

.....
On behalf of Penrose Trading