

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE YEAR 2024 (“STATEMENT”)

ABOUT THIS STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015 (‘MSA’), which requires Sinclair Pharma Limited and Sinclair Pharmaceuticals Limited to set out the steps taken by them and the other companies in Sinclair Pharma Limited’s group (together ‘Sinclair’) during the calendar year ending 31 December 2024, and the steps that Sinclair will continue to take, to prevent modern slavery and human trafficking within our business and supply chains.

MODERN SLAVERY

This statement outlines Sinclair's commitment to addressing modern slavery and the actions we take to uphold our responsibility to respect and protect the human rights of everyone connected to our business operations. For simplicity, we use the expression ‘modern slavery’ to encompass all forms of slavery, servitude, forced and compulsory labour, child labour and human trafficked labour.

OUR BUSINESS

As a leading aesthetic company, Sinclair plays a significant and active role in driving aesthetic advancement, whilst offering an innovative portfolio of products to patients, physicians, and clinics. Sinclair conducts all activities within a highly regulated framework and is committed to ensuring compliance with all applicable local and international laws, wherever we conduct our business. Sinclair is committed to a culture that fosters and promotes ethical decision making, corporate responsibility, respect for others and fairness in all our business dealings, and our internal processes ensure that this ethos is filtered throughout all commercial operations and dealings with partners.

STRUCTURE AND SUPPLY CHAINS

Our suppliers (‘suppliers’) are chosen based on quality, cost, location, adherence to regulatory standards, and alignment with our values.

Sinclair has a global supply chain network, and several of our suppliers are issued with a modern slavery questionnaire, which they must complete and return to Sinclair, detailing their practices and procedures to combat modern slavery.

POLICIES ON MODERN SLAVERY

Sinclair maintains a range of internal policies (reviewed on an annual basis) designed to identify and prevent modern slavery within our operations (and how to report any suspicions of wrongdoing):

- Code of Ethics- our Code sets out the standards of ethical behaviour expected of employees and partners. We strive to uphold the highest standards of ethical behaviour and conduct in our global operations and supply chain management.

- Speak Up Policy- we encourage employees and partners to report any suspicion of wrongdoing without fear of retaliation. Reports can be made confidentially and can be made anonymously, where permitted by local law.
- Partner Code of Ethics – in addition to compliance with the Code of Ethics, we expect our partners to adhere to the Partner Code which includes guidance on how to identify the signs that modern slavery may be occurring.

DUE DILIGENCE AND AUDITS PROCESS

Sinclair recognises that its most significant risk of exposure to modern slavery is in its supply chain. Within these channels, new suppliers and manufacturing factories/sites are subject to stringent due diligence including due diligence questionnaires which include specific questions relating to the provision of modern slavery prevention and detection, and audits of suppliers considered to have a medium to high-risk impact on product quality. We evaluate our suppliers through risk-based assessments and expect them to be compliant with our high-quality standards, including a firm commitment that no form of modern slavery is present in their business.

ASSESSMENT OF MODERN SLAVERY RISK

We are aware that certain industries/sectors and geographical areas pose different levels of risk in relation to modern slavery. In cases where we identify that a supplier operates in a potentially higher risk area, we intend to incorporate processes in the next fiscal year which review:

- The suppliers' policies and/or position relating to modern slavery including the controls they implement to eliminate the risk of modern slavery; and
- The reporting processes in place for suspicions to be raised and investigated.

SUPPLIER AGREEMENTS

Sinclair's agreements with its suppliers require them to comply with all applicable laws and provide termination rights if they fail to do so.

MODERN SLAVERY AWARENESS

To reinforce Sinclair's ethical standards, a communication will be circulated to suppliers, reminding them of our zero-tolerance stance towards modern slavery. Sinclair will use this opportunity to circulate the revised Partner Code of Ethics and will make it available via channels including its website.

We will also send an internal communication to employees globally to reiterate the same, including guidance on the signs that may indicate slavery is occurring and reminding employees how they should report any concerns.

TRAINING

Sinclair will implement an internal global training programme which will be tailored appropriately depending on the job role and function.

MEASURING EFFECTIVENESS

Sinclair measures its effectiveness in compliance with the MSA, through its ongoing audits, due diligence and assessments and through the policies it maintains, all of which are reviewed on a regular basis. We will continue to review how we can further address the potential presence of modern slavery within our business and supply chains.


Our maintenance of the appropriate safeguards against any mistreatment of persons working for or in connection with our business will continue, as we uphold the key value of acting with respect, fairness and integrity in our business dealings at all times.

We will review the effectiveness of our approach on an annual basis and report our progress in future statements. We will be specifically looking at:

- Training completion figures.
- Responsiveness to the modern slavery questionnaire.
- Supplier awareness and controls related to modern slavery.
- Any relevant speak up reports.

This statement has been approved by Sinclair's Board of Directors on:

Signed:

Signed by:

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Sinclair's Chief Executive Officer

Dated: 20 December 2024