

SINCLAIR

PARTNER CODE OF ETHICS
GLOBAL

CONTENTS

- 1 MESSAGE FROM THE CEO
- 2 INTRODUCTION
- 3 VISION, MISSION, VALUES
- 4 PROSPECTIVE PARTNERS
- 5 CURRENT OR EXISTING PARTNERS
- 6 AGREEMENTS WITH PARTNERS
- 7 ANTI-SLAVERY (MODERN SLAVERY)
- 8 COMPLIANCE WITH THIS CODE
- 9 WHAT TO DO IF YOU SUSPECT
A BREACH OF THIS CODE
- 10 RESPONSIBILITY FOR THIS CODE

MESSAGE FROM THE CEO

“The board of Sinclair Group is dedicated to ensuring Sinclair conducts its business ethically and in full compliance with all applicable laws, regardless of where we operate throughout the world.

We recognise that honest, ethical, and transparent business practices are the foundations of trust, and are vital to our ongoing growth, long-term success, and strong reputation across all our operations globally.

Integrity lies at the heart of ethical conduct, and Sinclair expects you to uphold and live by this principle in your everyday business decision-making and interactions.”

Amber Edwards – CEO

INTRODUCTION

In this policy references to 'Sinclair' or 'us/we/our' mean Sinclair Pharma Limited and all companies and branches within the Sinclair group. We believe that honest, ethical, and transparent business conduct is crucial to our continued growth, long-term success, and good reputation in all our operations throughout the world.

For the purposes of this Partner Code of Conduct ("Partner Code"), the term "Partner(s)" includes all external parties providing goods or services to Sinclair.

Sinclair's Code of Ethics ("Code of Ethics") sets out the values, principles and practices that guide and inform business conduct at Sinclair: reinforcing our commitment to a culture that fosters and promotes ethical decision making, corporate responsibility, respect for others and fairness in all our business dealings. You will see this summarised on our Vision, Mission, Values statement overleaf. Sinclair expects all Partners to comply with the Code of Ethics which you can access [here](#).

At Sinclair, we want our business to prosper but we want prosperity that we can all be proud of. We will not tolerate any illegal or unethical behavior under any circumstance by anyone providing services or goods to us, or those who act on our behalf. Sinclair's reputation, and the trust our customers place in us, is one of our most important assets.

The Code of Ethics also extends to how we manage our relationships with Partners and what a Partner can expect from us. Sinclair commits to demonstrating its values and robust standards of ethical behaviors in all dealings with Partners – Sinclair will act fairly, responsibly and with respect in its Partner relationships.

In addition to adhering to and complying with the Code of Ethics, we also expect Partners to understand, acknowledge and/or comply with the contents of this Partner Code.



Vision

Providing aesthetic excellence globally.

Mission

Driving the advancement of product quality and customer satisfaction, investing in innovation and people.

Values

Act with integrity.
Be results driven.
Embrace your winning spirit.
Stay ahead of the game.
One team, one goal.

4 PROSPECTIVE PARTNERS

Sinclair may require a Partner to complete a due diligence questionnaire or provide other information to help Sinclair assess its suitability as a Partner. Sinclair expects that prospective Partners will have internal processes in place to ensure they can uphold the standards contained in this Partner Code (and the Code of Ethics) and will be able to provide evidence of this, where required by Sinclair.

5 CURRENT OR EXISTING PARTNERS

Sinclair may also take appropriate measures to ensure that its current Partners continue to uphold the standards set out in this Partner Code (and the Code of Ethics). Sinclair strives for continual improvement and development in its supply chain and monitors the business conduct, performance and quality standards of Partners through periodic evaluation, including audits.

Partners should ensure that they make their management and employees aware of the standards expected by Sinclair and provide any necessary training to achieve this.

6 AGREEMENTS WITH PARTNERS

Sinclair will enter into agreements and/or terms and conditions with Partners, which provide that Sinclair and the Partner will comply with all applicable laws and regulations in relation to the provision of goods or services.

7

ANTI-SLAVERY (MODERN SLAVERY)

Sinclair's annual Anti-Slavery and Human Trafficking Statement ("**Statement**") is approved by the board of directors and signed by the Chief Executive Officer on behalf of the board. Sinclair's current Statement can be found on our website <https://sinclair.com/modern-slavery/>. It sets out the steps Sinclair has taken during the financial year to manage the modern slavery risks in our business and supply chains.

Sinclair respects and promotes the protection of human rights and requires its Partners to act in the same manner to prevent modern slavery and human trafficking in their business operations and supply chains. As part of our commitment to combat modern slavery, Partners may be asked to complete a Modern Slavery Questionnaire which will detail the processes you have in place to manage the modern slavery risks in your own business operations and with your partners. You can find some practical guidance on how to identify the signs that modern slavery may be occurring in Annex 1.

8

COMPLIANCE WITH THIS CODE

Sinclair takes compliance with this Code very seriously. Failure to live our values is in direct conflict with Sinclair's commercial ethos and culture of compliance. Further, failure to comply threatens our good reputation and may put us all at risk.

Any Partner who breaches this Code may have their contract terminated with immediate effect.

Sinclair recommends that you read and understand any policies or procedures referenced in this Code as they apply to your day-to-day business dealings with Sinclair.

9

WHAT TO DO IF YOU SUSPECT A BREACH OF THIS CODE

We all have a responsibility to speak up if we know or suspect that wrongdoing or misconduct has occurred or is occurring. Sinclair may also have a duty to report the concern to the relevant authorities.

If you are concerned about any potential misconduct relating to this Code, please contact the Compliance team – compliance@sinclair.com

or you can make a report via the Speeki service - <https://report.speeki.com> (for further details please see the Speak Up Policy which can be found here).

Sinclair prohibits retaliation against anyone who raises in good faith, or helps to address, a wrongdoing or misconduct concern, even if that allegation is subsequently found to be incorrect or unsubstantiated.

10

RESPONSIBILITY FOR THIS CODE



Sinclair's CEO and its board of directors have overall responsibility for this Code. The Chief Legal Officer and Head of Compliance are responsible for monitoring adherence and ensuring the enforcement of this Code.

ANNEX 1

WHAT IS MODERN SLAVERY?

Modern slavery refers to various forms of abuse and exploitation.



WHO IS AFFECTED BY MODERN SLAVERY?

Victims tend to be vulnerable individuals who are coerced or threatened into working for little or no money. It is more common to target individuals from countries with inadequate human rights protections or a record of human rights violations, but modern slavery can happen anywhere in the world, including the UK.

VICTIMS
CAN BE
ANY...



- AGE
- GENDER
- ETHNICITY
- NATIONALITY
- MINORITY/
MARGINALISED

VICTIMS CAN
BE
CONTROLLED
BY...



- COERCION
- VIOLENCE
- THREATS
- DECEPTION
- ABUSE OF POWER

ANNEX 1

HOW CAN I SPOT THE SIGNS THAT MODERN SLAVERY IS OCCURRING?

Modern slavery is a complex and criminal issue, but there are signs that may suggest abuse or exploitation is occurring in your business supply chains. The presence of these do not mean that modern slavery is occurring in a workplace, but they are cause for concern and should be considered further.



WHO DO I REPORT TO?

If you suspect modern slavery is occurring in your business or supply chains, talk to your Legal or Compliance teams, who should be able to advise you. You can also report to Sinclair via the channels available above. Finally, you can report a suspicion of modern slavery to the UK's [Modern Slavery Helpline](#) or to the police in your relevant country.

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