

ABOUT THIS STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015 ('MSA'), which requires Sinclair Pharma Limited and its group companies ('Sinclair Pharma'), to set out the steps we have taken during the financial years since the MSA came into force, and the steps we will continue to take, to prevent modern slavery and human trafficking within our business and supply chains.

MODERN SLAVERY

This statement explains Sinclair Pharma's stance and actions relating to modern slavery and how we accept our responsibility to respect and protect the human rights of all those who encounter 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 Pharma plays a significant and active role in driving aesthetic advancement, whilst offering an innovative portfolio of products to patients, physicians and clinics. Sinclair Pharma conducts all activities within a highly regulated, ethical framework and is committed to meeting high ethical standards whilst ensuring compliance with all applicable local and international laws, wherever we conduct our business. It is essential to create and maintain a healthy and ethical environment for all, and our internal processes ensure that this business conduct is filtered throughout all commercial operations.

OUR SUPPLY CHAINS

Our suppliers are chosen on the basis of quality, cost, location, compliance to regulatory standards, compliance to our own policies and standards, and integrity. Sinclair Pharma promotes supply chain awareness through our Supplier Code Statement. Sinclair Pharma has a global supply chain network and all current and prospective suppliers are encouraged to comply with our Supplier Code Statement, which details our expectations with regards to suppliers taking responsibility and accountability to promote human rights within their own supply chains and to ensure that our principles and high ethical standards are met throughout the business.

DUE DILIGENCE AND AUDITS OF SUPPLIERS IN THE SINCLAIR PHARMA SUPPLY CHAIN

Sinclair Pharma understands that the biggest risk of exposure to modern slavery, is in the product supply chain services that we purchase from third parties. Within these channels, new suppliers and factories/sites are subject to stringent due diligence checks by way of requesting necessary regulatory documents and audits for suppliers considered to have a medium to high-risk impact on product quality, conducted by or on behalf of Sinclair Pharma. We evaluate all suppliers through robust risk-based assessments and audits and expect our partners to be compliant with our own high quality standards, including a strict requirement of no form of modern slavery. These audits and assessments are intended to identify any modern slavery practices and in the event any issues are identified, appropriate remedial actions will be taken.

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT (“STATEMENT”)

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. Where we have identified suppliers that operate in a potentially higher risk area, we will look into their policies and/or position relating to modern slavery and ensure they are up to the high standards of Sinclair Pharma.

Sinclair Pharma will continue to remind key suppliers of our expectations in relation to adherence with all ethical standards on a continual basis, to ensure that they too assist with tackling the issue of modern slavery and promote transparency in the supply chain.

SUPPLIER AGREEMENTS

Sinclair Pharma’s agreements and terms and conditions detail our expectations with regards to our suppliers’ commitment to complying with local and international laws. Our agreements and terms and conditions govern the majority of our business relationships and Sinclair Pharma reserves the right to terminate the relationship with a supplier if the supplier fails to comply with its obligations under these agreements and terms and conditions.

MODERN SLAVERY AWARENESS

Sinclair Pharma’s Code of Conduct, Supplier Code Statement, Anti-Slavery and Human Trafficking Statement and other internal policies (‘policies’), require employees, officers, consultants, contractors, casual workers and agency workers to respect human rights and act with integrity. These policies do not explicitly refer to modern slavery, however the standards and expectations they set, should help to mitigate against it. Each Sinclair Pharma employee, officer, consultant, contractor, casual worker and agency worker is made aware of our values; the values of acting with integrity and demonstrating utmost respect for people, which resonate with helping to prohibit modern slavery. We ensure that selected key staff are aware of the need to identify modern slavery when looking into new and existing suppliers.

SINCLAIR PHARMA AND MODERN SLAVERY

Sinclair Pharma will continue to update its policies and procedures, raise awareness and look at how we can further address the potential issue of modern slavery within our business and supply chain. Our maintenance of the appropriate safeguards against any mistreatment of persons working for or connected to our business will continue, as we uphold the key value of acting with integrity. We will continue to review the effectiveness of our approach and report our progress in future statements.

This statement has been approved by Sinclair Pharma’s senior management.


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Chris Spooner, Chief Executive Officer
Sinclair Pharma Limited