

Statement of Compliance – Criminal Finance Act 2017 (“Statement”)

Sinclair Pharma Ltd and its group of companies (“Sinclair”) do not tolerate tax evasion in any form, including the facilitation of tax evasion and we take our obligations under the Criminal Finances Act 2017 (the “Act”) seriously.

Sinclair is in the process of implementing appropriate measures to demonstrate our commitment and compliance with our statutory obligations under the Act. This includes:

- (i) carrying out a risk assessment to understand our potential exposure to tax evasion,
- (ii) issuing a group-wide Anti Facilitation on Tax Evasion Policy (“Policy”) to all Sinclair employees,
- (iii) requiring our employees to demonstrate the highest standards of honesty and declare they understand and agree to the requirements of our Policy,
- (iv) training relevant employees on the requirements of the Act and the prevention of criminal facilitation of tax evasion, and
- (v) issuing this Statement, which will be reviewed and re-issued on a regular basis.

Sinclair will not engage with any individual or business that does not share our commitment to the prevention of tax evasion. We will undertake due diligence to mitigate the risk of facilitation of tax evasion offences and will ensure that agreements with third parties enable the termination of such agreements where an individual or business fail to comply with the provisions of the Act.

Signed:



Date: 9th October 2020

Chris Spooner

Sinclair’s Chief Executive Officer