

**ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FISCAL YEAR
2020 (“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 Pharma') during the fiscal year, and the steps that Sinclair Pharma 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.

STRUCTURE AND SUPPLY CHAINS

Our product suppliers ('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, which is available on Sinclair Pharma's website:

https://www.sinclairpharma.com/wp/wp-content/uploads/2018/11/2018-Sinclair_Pharma-Supplier_Code_Statement.pdf.

Sinclair Pharma has a global supply chain network and all current suppliers 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. In addition, our suppliers are issued with a Modern Slavery Questionnaire, which they must complete and return to Sinclair Pharma, detailing their practices and procedures to combat Modern Slavery.

POLICIES ON MODERN SLAVERY

Sinclair Pharma's Modern Slavery Policy, Code of Conduct, Supplier Code Statement, Anti-Slavery and Human Trafficking Statement and other internal policies ('policies') are reviewed annually and require employees, officers, consultants, contractors, casual workers and agency workers to respect human rights and act with integrity. Together, these policies set Sinclair Pharma's standards and expectations to help mitigate against any form of modern slavery and human trafficking.

DUE DILIGENCE AND AUDITS PROCESS

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 including 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 own high quality standards, including a strict requirement of no form of modern slavery. In addition, we intend to carry out reviews of the Modern Slavery Questionnaires when completed by suppliers with the intention of assessing and identifying any modern slavery practices. In the event any issues are identified, appropriate remedial action will be taken. No such action has been needed to date.

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

Sinclair Pharma will 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 with its suppliers require them to at all times comply with local and international laws and allow for termination in the event that they fail to do so.

MODERN SLAVERY AWARENESS AND TRAINING

We believe in acting with integrity and demonstrating utmost respect for people, which resonate with helping to prohibit modern slavery and we expect all of our employees, officers, consultants and contractors to respect these values. We also ensure that key staff who are responsible for supplier relationships and engaging with new suppliers are aware of the need to identify modern slavery.

MEASURING EFFECTIVENESS

Sinclair Pharma measures its effectiveness in compliance with the MSA, through its ongoing audits, assessments and training and through the policies it issues, all of which are reviewed on a regular basis. We will continue to update our policies to 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 in connection with our business will continue, as we uphold the key value of acting with integrity. We will review the effectiveness of our approach on an annual basis and report our progress in future statements.

This statement has been approved by Sinclair Pharma's Executive.

Signed: A handwritten signature in blue ink that reads "C P Spooner". The letters are cursive and somewhat stylized.

Chris Spooner

Sinclair's Chief Executive Officer

Dated: 9th April 2021