

SINCLAIR

SPEAK UP POLICY

GLOBAL

CONTENTS

1. [INTRODUCTION](#)
2. [PURPOSE & SCOPE](#)
3. [HOW DOES THIS AFFECT YOU – THE TYPES OF WRONGDOING OR MISCONDUCT YOU CAN REPORT](#)
4. [HOW DOES THIS AFFECT YOU – SOME EXCEPTIONS](#)
5. [HOW TO SPEAK UP](#)
6. [AVAILABLE CHANNELS FOR REPORTING](#)
7. [WHAT HAPPENS AFTER YOU MAKE A REPORT](#)
8. [CONFIDENTIALITY](#)
9. [PROTECTION AND SUPPORT FOR THOSE WHO SPEAK UP](#)
10. [COMPLIANCE WITH THIS POLICY](#)
11. [EXTERNAL DISCLOSURES](#)
12. [RESPONSIBILITY](#)

1 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, success and good reputation in all our operations throughout the world. Sinclair promotes a culture of openness, trust and accountability in order to prevent situations of wrongdoing or misconduct from occurring, but also to highlight or remedy them when they do occur.

As a global business, Sinclair requires your compliance with all applicable laws and regulations, and the local laws in every country in which we do business.

Sinclair values speaking up and wants to encourage you to report genuine concerns using the channels available, as set out in this policy.

If you Speak Up, please know Sinclair is listening.

2 PURPOSE & SCOPE

This policy applies globally to all Sinclair’s directors, senior management, employees (permanent and temporary) and contractors, irrespective of job role or function, together with any third parties authorised to act for or on Sinclair’s behalf.

The purpose of this policy is to cover the reporting of suspected or known wrongdoing or misconduct in relation to Sinclair’s activities. It will explain when and how to make a report.

We know that Speaking Up requires bravery, and that reporting a concern may be outside of your comfort zone – we hope this policy addresses any issues or concerns you may have. If you have any questions, we encourage you to contact the Compliance team at compliance@sinclair.com for a confidential discussion.

HOW DOES THIS AFFECT YOU - THE TYPES OF WRONGDOING OR MISCONDUCT YOU CAN REPORT

If you genuinely suspect or know that wrongdoing or misconduct has occurred or is likely to occur, then you should report it. Sinclair is committed to investigating all such allegations raised in good faith and through the channels available to you. This could include wrongdoing or misconduct related to:

- ✓ criminal activity or behaviour;
- ✓ breach of law or regulation;
- ✓ corruption, bribery or unethical behaviour;
- ✓ competitor interaction or conflict of interest;
- ✓ financial fraud, irregularity or mismanagement;
- ✓ the endangering of an individual's health and safety;
- ✓ damage to the environment;
- ✓ breach of Sinclair's policies and procedures;
- ✓ conduct likely to damage Sinclair's reputation; or
- ✓ a deliberate concealment of any of the above matters.

Concerns reported under this policy will typically affect:

- ✓ a department, team or function of Sinclair;
- ✓ Sinclair as a business;
- ✓ in very rare circumstances, possibly even the general public.

If in doubt about what you can report; please **REPORT**.

4

HOW DOES THIS AFFECT YOU - SOME EXCEPTIONS

For the avoidance of doubt, this policy is not intended to replace Sinclair's Disciplinary Policy, Grievance Policy or other employment related policies. If you have experienced a personal grievance during your employment, or wish to raise an employment related dispute, please raise this in accordance with Sinclair's Grievance Policy or contact the HR team for further guidance.

5

HOW TO SPEAK UP

We hope that in many cases you will be able to raise your concerns with your Line Manager, Compliance or the Chief Legal Officer. You may tell them in person or put the matter in writing, if you prefer. They may be able to agree a way of resolving or allaying your concern quickly and effectively.

However, there may be times when you do not wish to raise the matter with your Line Manager, Compliance or the Chief Legal Officer and in these instances, we have provided an alternative channel for you to report your concern.

This service is known as Speeki, and instructions for use are provided below.

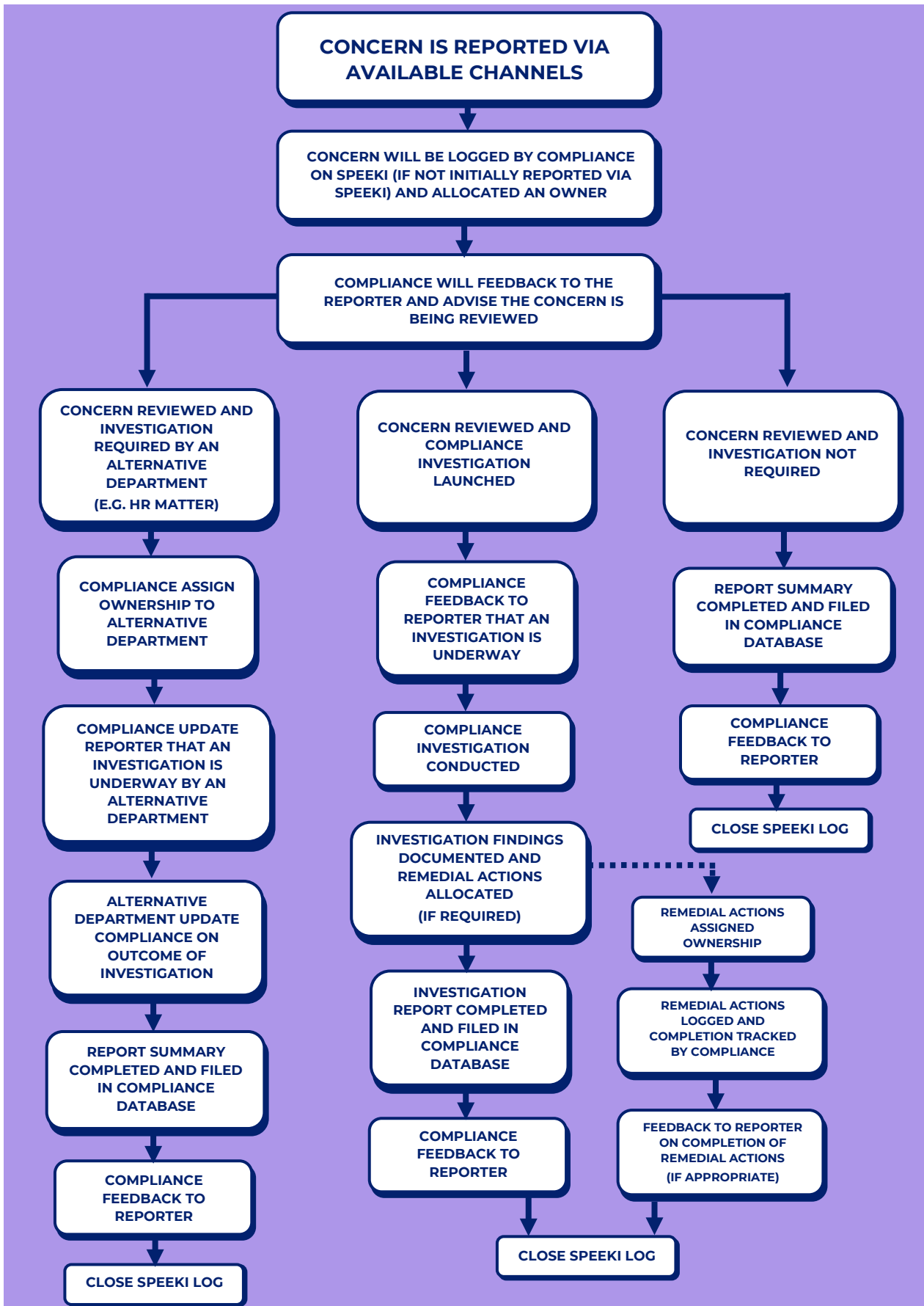
The choice of reporting channel is entirely yours and may depend on whether you want to make your report anonymously (where permitted by local law).

6

AVAILABLE CHANNELS FOR REPORTING

- Your Line Manager or Function Head;
- Compliance (compliance@sinclair.com);
- Human Resources – HR related matters only (hr@sinclair.com);
- **Speeki (the confidential reporting service)** - by downloading the Speeki app or visiting <https://report.speeki.com> and following the simple instructions to make a report.

WHAT HAPPENS AFTER YOU MAKE A REPORT



8 CONFIDENTIALITY

We will make every effort to maintain the confidentiality of anyone who Speaks Up (although there are circumstances where this may not be possible, where for example, the report leads to legal proceedings). Details of reports, and any subsequent findings, will only be shared with those who 'need to know', maintaining, where possible, the anonymity of the reporter.

For the avoidance of doubt, anyone who chooses to Speak Up anonymously via the Speeki service **will always remain anonymous** as we will not have knowledge of their identity.

Please remember that we want you to Speak Up and we will do everything we can to ensure that you feel comfortable doing so.

9 PROTECTION & SUPPORT FOR THOSE WHO SPEAK UP

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.

Sinclair will not tolerate any detrimental treatment or retaliation to be suffered by a reporter.

10 COMPLIANCE WITH THIS POLICY

Sinclair takes compliance with this policy very seriously; you have a responsibility to Speak Up and an obligation to uphold this policy through the highest standards of personal and professional integrity.

Sinclair may ask you to certify on a regular basis (or upon induction or policy update) that you have received, read, and understood this policy, and to acknowledge that you will comply with it and any associated policies or procedures.

You must also undertake any training that you are requested to do.

11

EXTERNAL DISCLOSURES

The purpose of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. Sinclair recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator.

12 RESPONSIBILITY



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

SINCLAIR

Eden House,

Lakeside

Chester

CH4 9QT

01244625150

compliance@sinclair.com