Modern Slavery Act 2015: Slavery and Human Trafficking Statement 2021

Introduction

This is the Sinclair International Ltd "(Sinclair)" Anti-Slavery Statement for the financial year ending 31st December 2022.

This is our seventh annual statement and it contains Sinclair International's actions taken to date including those in 2022 to understand all potential modern slavery risks related to its business and to enhance our activities to ensure slavery and human trafficking are not present in our supply chain.

Sinclair takes a zero tolerance approach to any instances of slavery or human trafficking, all forms of servitude and forced and compulsory labour. Our Anti-Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Structure and Supply Chains

Sinclair is the leading supplier of labels, label application equipment, and service to the fresh produce industry. We operate globally with label manufacturing sites in 10 separate locations and labelling installations in over 45 countries. We operate as part of a family of companies operated by Gulftech.

Our supply chain operates business to business within a predominantly on-shore model. To the best of our knowledge our supply chain does not include transactions with high risk countries where modern slavery is present. We seek to control suppliers through a stringent application process and on-going audit programme. We undertake no activities within our supply chain that could be considered high risk.

As part of the fresh produce industry we recognize that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility seriously during the coronavirus pandemic.

The following details the process and those responsible for activities within Sinclair that ensure our commitment to anti-slavery initiatives are considered appropriately in the various areas of the business where this is necessary.

Company Policies: Company policies, implementation and maintenance is managed by functional areas who will enact new policies and review existing policies as required. In relation to Modern Slavery these policies will primarily be managed by the Human Resources or Supply Chain departments. The personnel involved will ensure that relevant policies follow best practice and due diligence in these areas and consider modern slavery requirements. All policies are approved by the Leadership Group or relevant member hereof.

In 2022 we introduced a Recruitment Policy, Ethics and Business Conduct Policy and an Anti-Bribery policy

Training: Access to Modern Slavery related training will be provided by the Company to all relevant individuals. Refreshers dates are set, usually annually and access is through our Learning Management System (LMS). The LMS is managed and administered by our L&D Advisor who is aware of the requirements for the relevant individuals to have access and updates this as required. All staff have Individual Development Plans (IDP) and the relevant courses will be detailed here. Staff are responsible for the completion of their IDP once it has been agreed with their line managers and progress of this should be reviewed periodically as part of the quarterly Performance Management process.

Relevant Policies and Procedures

Sinclair operates the following policies that describe our approach to the identification of modern slavery risks and steps to prevent slavery and human trafficking in its operations:

Company Values: Our FRESH Company values make it clear to employees the actions and behavior expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behavior when operating in the UK, internationally and when managing our supply chain.

Whistleblowing Policy: We have in place a Whistleblowing Policy that encourages members of staff to report any instances of suspected wrongdoing and criminal activity as soon as they are identified. We offer an independent and confidential Whistleblowing hotline where staff and volunteers can raise concerns confidentially and anonymously if they wish.

Supply Chain: We have in place processes and procedures to identify risks of slavery and human trafficking in our business and supply chain which require anti-slavery and human trafficking due diligence on all of our tier one suppliers. Any new supplier will be assessed for their compliance with the act and on-going assessment via audit. Serious violation will lead to termination of the business relationship.

Employee Assistance Programme (EAP): Our EAP also provides staff with a secure way of seeking advice about any issues personally affecting them or their families.

Recruitment procedures: Sinclair operates a fair and transparent recruitment process. We always check that staff can demonstrate their eligibility to work in the UK and safeguard against modern slavery. In addition, Sinclair only use specified, reputable agencies on our preferred supplier list to source labour including temporary workers. All new suppliers, including recruitment agencies, are subject to Sinclair's Supplier Approval Process. The aim of this process is to ensure that we engage only with reputable organisations. Suppliers are required to complete a questionnaire that includes a Modern Slavery Act declaration. Completed questionnaires are reviewed by the Health & Safety, Quality and Supply Chain Managers. Potential suppliers who fail to meet our standards and requirements are not approved.

Due to the Covid 19 pandemic, additional measures were introduced to support the wellbeing of our staff. We continue to have a network of internal mental health first aiders; a Health and Safety forum is held monthly to review and discuss occupational health.

Training relating to Modern slavery

Sinclair makes all staff involved in procuring supplies for the business aware of "red flags" of slavery and human trafficking that they should consider when dealing with suppliers and during contractual negotiations, site visits or any interaction with the supplier and its workers.

We require all staff working in supply chain, quality team and human resources activities within Sinclair to complete training on modern slavery as part of our annual compliance training programme.

The learning outcomes from our modern slavery training include:

- Understanding of what is required to comply with the Modern Slavery Act 2015
- Understanding of what slavery is and the various forms that the modern slavery umbrella covers
- What Sinclair can do to help get rid of slavery in the UK
- How individuals can report concerns and suspicions relating to Modern Slavery

Further steps

No incidents of modern slavery have been identified within our business or supply chain in the financial year 2022. To continue to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following steps:

- Strengthen the Supplier Audit process. Review and add appropriate questions relating to their Anti-Slavery measures.
- Supply Chain department will introduce a Supplier Code of Conduct.
- Our Right to Work in the UK checks and procedures were reviewed and updated in line with the new regulations that were introduced following Brexit.
- Enhanced supplier training for all employees in the supply chain
- Publish flyers on the Company's intranet to raise awareness and highlight our commitments to Anti-slavery to the wider organisation.
- Introduce an Ethics Policy

Board member approval

This statement made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 2022 has been approved by the Board of Directors of Sinclair International Ltd.

Signature of President/CEO:

Date: 06 MARCH 2023