



Modern Slavery Act 2015: Slavery and Human Trafficking Statement 2018

Anti-Slavery Statement

This is the Sinclair International Ltd "(Sinclair)" Anti-Slavery Statement for the financial year ending 2018.

About Sinclair International Ltd

Sinclair is the leading supplier of labels, label application equipment, and service to the fresh produce industry.

Policy in Respect of Anti-Slavery and Human Trafficking

Sinclair takes a zero tolerance approach to any instances of slavery or human trafficking that are identified in our supply chain. 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.

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.

Procedures

In addition to our Whistleblowing Policy, we have in place processes and procedures to identify risks of slavery and human trafficking in our business and supply chain, including:

- fair and transparent recruitment procedures;
- anti-slavery and human trafficking due diligence on our tier one suppliers;
- whistle-blowing procedures.

Training and Communications

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.

Further steps

To continue to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following steps:

- Review our program of formal training for all staff involved in procuring supplies for the business
- Review our procedures in respect to due diligence on our tier one suppliers

This statement made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 2018 has been approved by the Board of Directors of Sinclair International Ltd.

Signature of President/CEO:

A handwritten signature in blue ink, appearing to read 'G. Woodcock', with a checkmark at the end.

Date: 4th March 2019