Modern Slavery Act 2015: Slavery and Human Trafficking Statement 2025

Introduction

This is the Sinclair International Ltd "(Sinclair)" Anti-Slavery Statement for the financial year ending 31st March 2025.

This is our tenth annual statement, and it contains Sinclair International's actions taken to date including those in 2025 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 adopts a zero-tolerance policy towards slavery, human trafficking, all forms of servitude, and forced or compulsory labour. Our Anti-Slavery Statement demonstrates our commitment to conducting business ethically and with integrity, ensuring effective systems and controls are in place to prevent slavery and human trafficking in our supply chains.

Structure and Supply Chains

Sinclair is a leading global supplier of labels, label application equipment, and related services to the fresh produce industry. We operate worldwide, with label manufacturing sites in 9 separate locations and labelling installations across more than 45 countries, and we are part of the Gulftech family of companies.

In alignment with 2025 standards for preventing modern slavery, we predominantly source our materials and services from the United Kingdom, the United States, and the Eurozone—regions generally deemed low risk. We do not knowingly engage with suppliers in high-risk countries. Our robust supplier application process and ongoing audit program are further strengthened by our Supplier Code of Conduct, which explicitly prohibits modern slavery, forced labour, and child labour, while requiring respect for workers' rights and promoting equitable working conditions and fair compensation. We undertake no activities within our supply chain that could be considered high risk.

As part of the fresh produce industry, we recognize our responsibility to maintain a comprehensive approach to preventing slavery and human trafficking. We remain dedicated to this commitment, especially amid ongoing geopolitical challenges and evolving regulatory requirements.

The following outlines the process and individuals responsible for activities within Sinclair that ensure our commitment to anti-slavery initiatives is effectively considered across the relevant areas of the business.

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.

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 since 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 organization. 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: Our Whistleblowing Policy 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 maintain robust processes and procedures to identify and mitigate the risk of modern slavery and human trafficking within our operations and supply chain. These include anti-slavery and human trafficking due diligence for all tier-one suppliers. Any new supplier undergoes a compliance assessment, and ongoing audits help ensure continued adherence to relevant legislation and our Supplier Code of Conduct. In the event of a serious violation, we will terminate the business relationship.

Employee Assistance Program (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 labor 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 organizations. 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.

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 program.

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 eliminate 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 organization or supply chain in the financial year 2025. The 2024 Modern Slavery Statement explained that Sinclair intended to publicize flyers on its Company Intranet to raise awareness and highlight our commitments to Anti-slavery to the wider organization alongside introducing an Ethics Policy. Sinclair is pleased to confirm these steps have since been addressed as we continue to strengthen our commitment to adhering to the best possible standards.

Board member approval

This statement made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 2024 has been approved by the Board of Directors of Sinclair International Ltd.

Signature of President/CEO:

Date:

01 March 2025