



**SINCLAIR**

**SPEAK UP POLICY**  
**(Global)**

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## **1 INTRODUCTION**

Sinclair Pharma Ltd and its group companies ('Sinclair') believes that honest, ethical and transparent business conduct is crucial to our continued growth, success and good reputation. 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.

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

## **2 PURPOSE**

This policy covers 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.

## **3 SCOPE**

This policy applies to all Sinclair's directors, officers, employees and temporary workers, third parties, affiliates, subsidiaries and other partnerships, across the Sinclair group no matter where they are located or the role they perform. No member of staff, at any level, has the authority to give any instructions or take any action which in any way contradicts this policy

## **4 RESPONSIBILITY**

### **4.1 YOUR RESPONSIBILITY**

Every director, employee, officer, temporary worker, third party, affiliate, subsidiary or other partner ('Responsible Parties') of the Company has a responsibility to speak out if they suspect or are aware of any wrongdoing, misconduct or corruption. All Responsible Parties have an obligation to uphold this policy through the highest standards of personal and professional integrity.

### **4.2 POLICY RESPONSIBILITY**

The CEO has overall responsibility for this policy. The Country Operations Directors have responsibility for it in their business units and territories. The Chief Legal officer in conjunction with the Head of Compliance are responsible for administering this policy and ensuring it is adhered to by all business units.

## **5 POLICY**

### **5.1 GENERAL**

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.

## **5.2 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 the course of your employment, or wish to raise an employment related dispute, please raise this in accordance with Sinclair's Grievance Policy. Typically such grievances will affect an individual only and be personal in nature. Concerns raised under this policy should address wider issues, and these may affect a department or team, Sinclair as a business, or potentially even the general public.

## **5.3 PROCEDURE FOR SPEAKING UP**

Sinclair hopes that in many cases you will be able to raise your concerns with your Line Manager, the Compliance Team 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, the Compliance Team 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).

## **5.4 AVAILABLE CHANNELS FOR REPORTING**

- Your Line Manager
- Human Resources – HR related matters only ([hr@sinclair.com](mailto:hr@sinclair.com))
- Compliance Department ([compliance@sinclair.com](mailto:compliance@sinclair.com))
- Chief Legal Officer ([jburrell@sinclair.com](mailto:jburrell@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 (for more detailed instructions please see below).**

## **5.5 NEXT STEPS – REVIEW AND INVESTIGATION**

All reported concerns will be recorded, reviewed and, where appropriate, investigated. Regardless of how a report is made, the Compliance Team will use Speeki to record all reports.

Where a report is made to a Line Manager, they should contact the Compliance Team with details of the concern so that it can be appropriately recorded. The Line Manager and Compliance Team will agree the scope of any necessary investigation, and the reporter will be provided with feedback, where possible.

Where a report is made to the Chief Legal Officer or the Compliance Team, they will carry out a discrete and sensitive initial assessment of the concern to determine the scope of any necessary investigation. The Compliance Team will provide feedback to the reporter, where possible.

Where a report is made using Speeki, the Compliance Team will conduct an initial assessment of the concern and will investigate, as necessary. Although you will be asked to register with Speeki using your email address (although you may choose to make a report as a guest), your personal details will not be shared with anyone at Sinclair. You may be asked for further information regarding your report via the chat function in the Speeki platform or app. You will be provided with a case number and PIN to access this function and to receive updates on the progress of your report. This means that even if you have decided to report anonymously, you will still be able to provide further detail, as required, and receive feedback. **For the avoidance of doubt, unless you choose to disclose your personal details, Sinclair will not be able to identify you.**

## **5.6 PROTECTION AND 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. Unless a report has been made in bad faith, maliciously, or is knowingly false, Sinclair will not tolerate any detrimental treatment or retaliation to be suffered by a reporter.

## **5.7 CONFIDENTIALITY**

Depending on the outcome of the investigation, the Compliance Team will share any findings with the Chief Legal Officer, and it may be necessary to

report to the board of directors. Sinclair will make every effort to maintain the confidentiality of an individual making a report (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 Sinclair 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.*

## **6 BREACHES**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

## **7 GENERAL QUERIES**

If you have any queries about this policy you should contact your Line Manager or the Compliance Team ([compliance@sinclair.com](mailto:compliance@sinclair.com))

## Appendix 1

### Speeki App Quick Guide (Company Name: Sinclair Pharma)

**speeki**

### Speeki App Guide

**STEP 1** Download the App

Download on the App Store | GET IT ON Google Play

**STEP 2** Enter company name

Welcome! Please enter the company name to start.  
Company name: [Enter your company name] [CONTINUE]

**STEP 3** Review the accessible actions

Home | Search | Chat | Reporting | Settings

**STEP 4** Submit confidential report

Report to Nicola  
I'd like to report a health and safety issue. I'll be providing a report for your company. Would you like to start a chat?  
[START REPORT]

Health & Safety - Overview  
This includes any workplace incidents that potentially compromise the health, safety or wellbeing of employees, customers and visitors of the organisation, or any other safety or health conditions, or incidents.  
If you believe that there was a health and safety breach occurring in the company:  
[CREATE A REPORT]

Can we have your contact information to help us conduct further investigations, or do you want to remain anonymous?  
[YES, I WANT TO REMAIN ANONYMOUS] [NO]

AN REPORT IS RELATED TO HEALTH AND SAFETY BREACH  
[VIEW]

Your report has been submitted

speeki.com

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## Appendix 2

### Speeki Web Quick Guide (Company Name: Sinclair Pharma)

**speeki**

**Speeki Web Reporting Portal Guide**

**STEP 1** Go to the Web Portal:  
<https://report.speeki.com>

**STEP 2**

- 1 Enter your company name
- 2 Click on SIGN UP
- 3 Enter your information

Speeki Web Reporting Portal Guide includes a 3D female avatar and screenshots of the 'Welcome' and 'Sign up' pages.

**STEP 3** Create a new report

Follow the prompts

Upload documents (not mandatory)

**STEP 4** You will receive a report ID, save this

From the HOME page you can view the following:

- Chat with a Case Manager
- View your reports

speeki.com

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Speeki Web Reporting Portal Guide includes screenshots of the 'Create a new report' form, document upload interface, and the 'My reports' dashboard.