

Modern Slavery and Human Trafficking Statement for year ending June 30th 2019

Modern slavery and human trafficking are violations of fundamental human rights. Frontier Agriculture has made a series of commitments in support of the Modern Slavery Act 2015:

- We are committed to ethical principles, and require all employees to comply with employment legislation and supply chain management legislation in the countries in which we operate.
- We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chain.
- We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

Frontier recognises that agriculture has been identified as a high risk industry for modern slavery and takes very seriously our duty to ensure our business and supply chains are free from it. The bulk of our own operations are UK based and we have longstanding policies in place to ensure the health, safety, ethical recruitment and fair management of all our employees.

Background information

Frontier was formed in 2005 as a joint venture between Associated British Foods plc and Cargill Inc and, in the financial year ending June 30th 2019, achieved revenues of £1.6 billion. Frontier has 48 sites across the UK, with main offices in Perth, Berwick-upon-Tweed, Cranswick, Witham St Hughs, Diss, Sandy, Hermitage, Nottingham and Ross-on-Wye. At June 30th 2019 the Frontier Group employed 977 permanent staff, increasing in the summer months by around 150 temporary staff for harvest.

Operating across all aspects of arable crop production and grain marketing, Frontier supplies seed, crop protection products and fertiliser to farmers, as well as providing specialist agronomy advice and services. Frontier runs a transport fleet extending to 118 LGVs and is also the UK's largest grain storekeeper, managing up to 1m tonnes of storage. Frontier has a number of divisions providing additional specialist advice to growers, and also operates a joint venture at Southampton Grain Terminal. Frontier's policies apply to all our divisions and subsidiaries, including new acquisitions.

Frontier's company values of integrity, customer focus and expertise are clearly defined, communicated to all employees and measured as part of every employee's performance appraisal. Our commitment to the value of integrity has been defined as follows:

- We are honest, respectful and reliable in the way we work with each other and the people with whom we do business
- We do things properly because we know it's the right thing to do
- We behave consistently in terms of openness, honesty, inclusiveness and high standards
- We deliver what we have promised or are open about why this has not been possible
- We develop company policies and procedures to ensure we operate within the law and we take responsibility for our actions.

Our approach to implementing the 2015 Modern Slavery Act reflects our values and our leadership position in UK Agriculture.

Our existing processes

Frontier runs a highly skilled, experienced Human Resources department, which operates within a series of policies regarding the recruitment, selection, training and management of our employees. All managers in the business have access to training in all areas of the employee lifecycle and are supported by HR in the way they implement them. In addition, 194 managers have now taken part in our Leadership Development Programme or Team Leader Development Programme, which includes a specific HR Module.

Our existing policy on Respect, Diversity and Equality details how Frontier values differences and aims to treat people with respect and conduct all activities in a non-discriminatory manner. In addition our Whistleblowing Policy protects those who raise concerns over any aspect of our operations, which will include Modern Slavery issues.

Frontier has clearly stated that its number one priority is the health and safety of all our people and those that work with us. Our policies, practices and audits demonstrate our commitment in this area and we make awards for employees who are active in promoting Health and Safety above commercial interests.

The Responsible Choice is Frontier's response to the sustainability agenda and sets out our aspirations and corresponding actions in five key areas: People, Partnership, Planet, Production and Prosperity. Modern Slavery Act compliance forms part of our work under the People pillar but our approach to managing the risk of modern slavery in our supply chains will be simplified by our approach under the Partnership pillar, which requires close collaboration with all colleagues, customers and suppliers. A Modern Slavery Compliance Group, comprising nine senior managers from across the business, is responsible for managing our approach to the Modern Slavery Act 2015.

Activity during this financial year

At the beginning of the year, the Modern Slavery Compliance Group became the Supply Chain Compliance Group to broaden its remit to oversee ethics across the whole supply chain including modern slavery.

During the financial year ending June 30th 2019, the Supply Chain Compliance Group met regularly, either in person or by conference call, to assess risk, identify actions and implement the decisions made in relation to modern slavery.

Frontier has invested in the leadership of the supply chain by hiring David Alliston to the Senior Leadership Team as the Director of Operations and Supply Chain Management.

Frontier has also become a full AB member of SEDEX (the Supplier Ethical Data Exchange) which is dedicated to driving improvements in responsible and ethical business practices in global supply chains. This improved membership provides Frontier with greater ability to risk assess its suppliers against all areas of ethical practice including Modern Slavery.

Under our Modern Slavery policy, Frontier has committed to provide training for those most affected by the policy, to ensure they understand and comply with the Modern Slavery Act. In January 2018 we produced a film about the company's approach to Modern Slavery. In 2019 Frontier introduced the Modern Slavery film into the Orientation Workshop for all new employees. As of end of June 2019, 563 employees were recorded as having watched the film.

In November 2018, Frontier sent Modern Slavery Act letters to our suppliers explaining our business' expectations of them. Terms and conditions for all new suppliers include a modern slavery clause. The Supply Chain Compliance Group also carried out risk assessments on our business' biggest suppliers.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Statement for the financial year ending 30th June 2019.

The Board of Directors of Frontier Agriculture Limited delegated approval of this statement on its behalf to the Chief Executive Officer and Managing Director of the Company, at its board meeting on 21st November 2019.

A handwritten signature in black ink that reads "Mark Aitchison". The signature is written in a cursive style and is underlined with a single horizontal line.

**Mark Aitchison
Chief Executive and Managing Director**

21st November 2019