

Modern Slavery & Human Trafficking Policy

1.0 Policy aims

This policy is a statement of Company policy that takes into account current legislation in the form of the Modern Slavery Act 2015.

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded and forced labour, sex trafficking, child labour and domestic servitude. These criminal activities all deprive people of liberty in order to exploit them for personal or commercial gain.

- 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. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, business partners and 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.

2.0 Scope of policy

This policy applies to all employees of Frontier Agriculture Limited, its divisions, subsidiaries and joint venture businesses, and includes part time and temporary staff.

3.0 Company and Employee Commitments

3.1 Supply Chain Management

- We will not support or deal with any business which is known to be involved in slavery or human trafficking.
- We will ensure that all new suppliers are clearly informed that adherence to the provisions of the Modern Slavery Act 2015 is part of our terms and conditions of trading.
- We expect that our suppliers will comply with the Modern Slavery Act 2015 and that they will hold their own supply chains to the same high standard.

3.2 Coercion

- Freedom of Employment: All employees shall have the right to enter into employment voluntarily and freely, without the threat of a penalty.

Modern Slavery & Human Trafficking Policy

- **Termination of Employment:** Employees shall have the freedom to terminate employment by means of notice of contractual length at any time without penalty. Frontier shall not use any means to restrict a worker's ability to terminate employment, for example by requiring deposits, withholding employee documentation, threats or use of violence, imposing financial penalties or requiring payment of recruitment fees.
- **Threat of Violence, Harassment & Intimidation:** Frontier shall not exact work or service from any person under the menace of any penalty. This includes the use or threat of physical or sexual violence or harassment.

3.3 Coercion in Wage Payment, including Debt Bondage and Bonded Labour

- Wages shall be paid regularly and methods of payment are prohibited that deprive workers of the genuine possibility of terminating employment. Wage payments shall not be delayed or deferred such that wage arrears accumulate.
- Wages shall be paid directly to the employee and will be paid in legal tender and payment in the form of vouchers, coupons or promissory notes is prohibited.
- Employees that earn wages calculated on a performance-related or piece-rate basis shall not earn less than the legally mandated minimum wage.
- Employees shall not be held in debt bondage or forced to work in order to pay off an actually incurred or inherited debt.
- Deception in wage payment, wage advances, and loans to employees shall not be used as a means to bind workers to employment. Employees shall be duly informed of the terms and conditions surrounding the granting and repayment of advances and loans.
- No deductions from wages shall be made with the aim of indebting a worker and binding him or her to employment, and measures will be taken to limit wage deductions to prevent such conditions. Employees shall be informed of the conditions and extent of wage deductions.

3.4 Migration for Employment

- All employees, irrespective of their legal status, shall be treated fairly, and will not be subject to abusive conditions or fraudulent practices that may lead to coercion and trafficking for labour exploitation.
- Migrant employees shall benefit from conditions of work no less favourable than those available to local employees, and shall have the right to enter into and terminate employment with reasonable notice voluntarily and freely, without the threat of a penalty.
- Frontier will not threaten irregular migrant employees or their family members with denunciation to the authorities or otherwise coerce such workers into taking up or maintaining employment.

Modern Slavery & Human Trafficking Policy

- Recruitment: No fee or cost for recruitment shall be charged directly or indirectly, in whole or in part, to any employee.

3.5 Document Retention

- Practices such as confiscating or withholding worker identity documents (e.g. passports or driving licences) or other valuable items (e.g. work permits and travel documentation) are prohibited.
- Frontier will not retain personal documents for the purpose of binding workers to employment.

4.0 Responsibility

- The Board of Directors has delegated to the Executive Directors overall responsibility to ensure this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- The Modern Slavery Compliance Group is responsible for implementing the policy and reviewing the internal control systems to ensure they are effective.
- Line managers at all levels are responsible for ensuring that all those who report to them understand and comply with this policy. The line managers have a duty to highlight roles within their teams that will require additional training.
- All staff must read, understand and comply with this policy.
- All staff must avoid any breaches of this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff must avoid any activity that breaches this policy.
- All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.
- We encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that nobody suffers any detrimental treatment as a result of reporting suspicions about any part of our own business or those of our supply chains. This is in accordance with our existing policy on Whistle-blowing which can be found on the Link.

5.0 Communication

We will provide training for employees that may be most affected by this policy about the risks of modern slavery and human trafficking to maintain a high level of understanding of this issue in our workforce. We also encourage any other employee who feels they need training to ask their line manager or any member of the Modern Slavery Compliance group.

Our commitment to eliminating modern slavery in our supply chains will be part of our terms and conditions of trading with all suppliers, contractors and business partners when we commence a business relationship with them, and will be reinforced in regular communications with them.

Modern Slavery & Human Trafficking Policy

Our annual Slavery and Human Trafficking Statement will provide information to supplement this policy, setting out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business. Our annual statement will include details of our activities, processes and the actions being taken to ensure that Modern Slavery is not deliberately or inadvertently supported by us.

6.0 Breaches of Policy

Any employee who breaches this policy will be investigated, which may lead to disciplinary action, and could result in dismissal for gross misconduct.

All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future. Under the terms of our Whistleblowing Policy, nobody will suffer any detrimental treatment as a result of reporting suspicions about any part of our own business or those of our supply chains.

We reserve the right to terminate our relationship with any person who acts on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, business partners and our supply chain if issues of non-compliance are discovered and/or not resolved in a timely manner.

7.0 Further Information

If you have any questions about the Modern Slavery Act and this policy please contact a member of the Modern Slavery Compliance Group, which comprises the following members:

Jon Berry – HR Director (Chair)
Charlie Whitmarsh – Crop Production Director
Simon Christensen – Grain Director
Sharon Kennett – Marketing Director
Tony Grayburn – Commercial Director – crop protection
Richard Pollard – Director of Operations
Sarah Cox – Quality Assurance Manager
Ben Chalkley – Human Resources Manager
Rachell Elvidge – Senior Financial Accountant

Information and advice is also available at: <https://www.gov.uk/>