

Modern Slavery and Human Trafficking Statement for year ending 30th June 2022.

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 30th June 2022 achieved revenues of £1.7 billion. Frontier has 45 sites across the UK, with main offices in Perth, Berwick-upon-Tweed, Cranswick, Witham St Hughs, Diss, Sandy, Hermitage (Newbury), Nottingham and Ross-on-Wye. At 30th June 2022, the Frontier Group employed 991 permanent staff, increasing in the summer months by around 52 temporary staff for harvest 2021. 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 237 vehicles and is also the UK's largest grain storekeeper, managing up to 1m tonnes of storage, and has a number of divisions and expert product lines providing additional specialist advice to growers. 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 (HR) 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, 325 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's number one priority is the health and safety of all our people and those who 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/pillars: 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 Prosperity pillar, which covers governance and compliance requirements, and the Partnership pillar, which requires close collaboration with all colleagues, customers and suppliers.

During the financial year we have employed a dedicated Sustainability Manager whose responsibility it is to drive all aspects of Frontier's sustainability agenda.

A Modern Slavery Compliance Group, comprising eight senior managers from across the business, was set up in 2015 to lead Frontier's approach to the Modern Slavery Act.

Since 2019, Frontier's Modern Slavery Compliance Group was incorporated into the Company's Supply Chain Compliance Group, broadening that group's remit to oversee ethics across the whole

supply chain, including modern slavery. During the financial year ending 30th June 2022, the Supply Chain Compliance Group met via Teams to assess risk, identify actions and implement the decisions made in relation to modern slavery.

Frontier is a full Buyer/Supplier (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.

Frontier additionally completed a successful SMETA (Sedex Members Ethical Trade Audit) in December 2019 and has a 4-pillar SMETA audit scheduled for October 2022.

Under our Modern Slavery Policy, Frontier has committed to raising awareness through a new-starter induction and orientation process and further training for those who support our audit and compliance process. We have also produced a short film for all staff about the company's approach to modern slavery, supported by a poster campaign. These are shared with all staff and promoted across the Company's internal communication channels.

Our existing internal safety reporting process was expanded to enable colleagues to raise potential modern slavery concerns. Colleagues can report potential issues they see during the course of their normal work; for example, delivery drivers visiting third-party premises or farms may see activity they believe could indicate modern slavery. The process enables them to flag that concern to Frontier's management, using a confidential online form, for further investigation/action if appropriate.

During 2020 Frontier initiated a comprehensive review of work patterns and overtime to better understand peak demand, particularly in harvest, and consider any resulting impacts on wellbeing and productivity. A focused group within our Operations team, supported by HR, has been established and has commenced work to apply those findings across a range of activities including reporting, education for line managers and wellbeing.

Activity during this financial year

Our programme of education at the point of induction continues and is well supported by our line manager population. Our company values, one of which is integrity, and under which our stance on modern slavery sits, continues to be threaded through our team leader and leader progress run throughout 2021.

We have provided enhanced training in modern slavery to six new staff members from various business functions who form an additional Supply Chain Compliance working group. Their role is to

support the Compliance team in the delivery of the goals throughout the year and to continue to raise the profile of modern slavery awareness amongst Frontier staff.

In November 2021 we launched our new HR system called The Hub. Using the SAP SF global software platform, this system allows our people to directly manage their personal data through self service. With access from all devices 24/7, The Hub has modernised our approach and improved our capability as a business to manage, monitor and support our people through, for example, reporting on working time.

We continue to initiate relationships via the Sedex platform with consumers and suppliers, linking the supply chain and improving transparency and awareness of supply chain compliance.

During 2021 we undertook a validation exercise to assess that we are meeting all commitments as laid out in this statement which we repeat annually.

As part of our standard business process, Modern Slavery Act letters are sent to selected suppliers explaining our business' expectations of them. Terms and conditions for all new suppliers include a modern slavery clause.

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 2022. 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 7th December 2022.

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 Officer and Managing Director
7th December 2022**