

## **Modern Slavery and Human Trafficking Statement for year ending 30<sup>th</sup> June 2024**

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. All 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.

Frontier was formed in 2005 as a joint venture between Associated British Foods plc and Cargill Inc and, in the financial year ending 30<sup>th</sup> June 2024 achieved revenues of £1.8 billion. Frontier has 43 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 30<sup>th</sup> June 2024, the Frontier Group employed 1126 permanent staff, increasing in the summer months by around 223 temporary staff for harvest 2023. 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 236 vehicles and is also the UK's largest grain storekeeper, managing up to 1 million 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 the employee's performance review. 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, 372 managers have now taken part in our Leadership Development Programme and we have commenced the expansion of our 'Leadership Pathway' to provide appropriate training on a broader scale.

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 missions and corresponding goals in five 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, risk and compliance requirements, and the Partnership pillar, which requires close collaboration with all colleagues, customers and suppliers.

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. The Supply Chain Compliance Group has representation from Frontier's Senior Leadership Team, and during the financial year ending 30<sup>th</sup> June 2024, it met via Teams to assess risk, identify actions and implement the decisions made in relation to modern slavery. The Supply Chain Compliance Group is supported by a cross-functional working group whose

role is to support in the delivery of the goals through-out the year and continues to raise the profile of Modern Slavery awareness amongst staff.

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 membership provides Frontier with the ability to risk assess its suppliers against all areas of ethical practice - including modern slavery - and to actively make connections with suppliers and customers, thus improving the ethical supply chain.

Frontier additionally completed a successful pillar 4 SMETA (Sedex Members Ethical Trade Audit) in 2019, in 2022 and has one planned for 2024.

Under our Modern Slavery Policy, Frontier has committed to raising awareness through our 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 is automated and 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 that 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. No reports connected to modern slavery concerns were logged during the year ending June 2024.

Our industry has significant peak activity periods, particularly in harvest, and so we must be focused on mitigating any impacts on well-being and productivity. The Working Time Governance Group continues to monitor this, and to implement 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, is a key element of our new 'Welcome to Frontier' induction.

We have also revised and relaunched our Performance Review process, which has simplified how employees set and monitor their goals. Each performance review automatically incorporates a section that encourages employees to consider goals directly related to our values of Integrity, Customer Focus, and Expertise

Our horizon scanning activity which is fed into every Supply chain compliance steering group meeting provides insights that we consider in the context of existing and emerging risks in relation to Modern slavery. During the year this led us to perform an assessment of our car wash and office cleaning services with no concerns found following the review. We continue to initiate relationships with consumers and suppliers via the Sedex platform, linking the supply chain and improving transparency and awareness of supply chain compliance. Over the last 12 months we have linked with an additional 6 suppliers / customers.

We undertake an annual validation exercise to assess that we are meeting all commitments as laid out in this statement.

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 30<sup>th</sup> June 2024. 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 9<sup>th</sup> December 2024.**



**Mark Aitchison**  
**Chief Executive Officer and Managing Director**