

## **Modern Slavery and Human Trafficking Statement for year ending 30<sup>th</sup> June 2025.**

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.

Our approach to modern slavery is aligned to the UN Guiding Principles on Business and Human Rights, which outlines corporate responsibility to respect human rights and provide access to remedy. We apply these principles through our membership with Sedex and participation in SMETA audits, which assess ethical performance across labour, health and safety, environment, and business ethics. Our policies and practices are also aligned with the Ethical Trading Initiative (ETI) Base Code, ensuring that our standards reflect internationally recognised labour rights. These frameworks underpin our due diligence processes, supplier engagement, and continuous improvement efforts across our supply chain.

### **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 30<sup>th</sup> June 2025 achieved revenues of £1.6 billion. Frontier has 42 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 2025, the Frontier Group employed 1136 permanent staff, increasing in the summer months by around 186 temporary staff for harvest 2024. 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 252 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 HR policies are aligned to ACAS which is recognised as best practice in UK employment law.

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, 462 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 difference 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.

Our Modern Slavery and Whistleblowing policies are aligned with internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights, the UK Modern Slavery Act 2015, relevant ILO Conventions, and the OECD Guidelines for Multinational Enterprises. These policies ensure robust protections against exploitation, promote transparency, and provide safe, confidential channels for reporting concerns without fear of retaliation.

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 2025, 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 Agriculture conducts periodic risk assessments of our supply chain to identify and prioritise areas where the risk of modern slavery is greatest. Our due diligence activities are focused on these high-risk areas to ensure effective mitigation and oversight. In addition, we operate a horizon scanning programme that monitors news reports and legislative developments related to modern slavery in the UK. This enables us to stay informed, continuously improve our practices, and respond proactively to emerging risks and regulatory changes.

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.

Whilst Frontier Agriculture maintains strong visibility and oversight of its Tier 1 suppliers, we recognise the inherent challenges in mapping and monitoring indirect supply chains beyond this level. These limitations are due to the complexity of global supply networks, particularly where multi-tier sourcing is involved. However, we are committed to improving transparency by engaging with suppliers through Sedex, encouraging disclosure of their own supply chains, and prioritising relationships with partners who share our commitment to ethical practices. We continue to explore approaches to enhance visibility and mitigate risks further downstream.

Frontier completed a successful pillar 4 SMETA (Sedex Members Ethical Trade Audit) in 2019, in 2022 and December 2024.

We ensure all company policies, including those related to ethical conduct and modern slavery, are clearly communicated to employees through induction programmes, ongoing training, and internal

communications. Policies are accessible via our employee SharePoint site and reinforced through leadership development initiatives and performance reviews.

Adherence is supported by our HR and compliance teams, who provide guidance, and take corrective action where necessary. Periodic audits and feedback help ensure policies are consistently applied across all business areas. We provide 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 2025.

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**

In December 2024, Frontier underwent a SEDEX Members Ethical Trade Audit (SMETA) at our Head Office. The audit identified a number of corrective actions, which have since been fully addressed, and also highlighted numerous examples of good practice across our operations. This process reflects our ongoing commitment to continuous improvement, ethical business conduct, and compliance with international labour and human rights standards.

Over the past year, we have focused on engaging with our material chemical suppliers to strengthen ethical oversight. We invited them to complete our Ethical Supplier Questionnaire and share insights into their own human rights and compliance programmes. The response was overwhelmingly positive, with the majority demonstrating robust policies and practices in place. For those suppliers whose programmes were less developed, we have worked collaboratively to support improvements and encourage alignment with our ethical standards.

As part of our ongoing commitment to ethical standards and compliance, during the financial year Frontier launched a new Code of Conduct to clearly define expectations for ethical behaviour across the business. Alongside this, we have updated our Whistleblowing Policy and procedure, enabling employees to confidentially report concerns regarding illegal, unethical, or irresponsible activities via the independent portal, available 24/7. These updates reinforce our values and provide clear, accessible channels for raising concerns.

During the year our Supply Chain Compliance Group and HR team completed online iHASCO Modern Slavery training, reinforcing our commitment to awareness, prevention, and best practice in tackling modern slavery risks.

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 16 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 2025.**

**The Board of Directors of Frontier Agriculture Limited delegated approval of this statement on its behalf to the Group Managing Director of the Company, at its board meeting on 15<sup>th</sup> December 2025.**

**Diana Overton  
Group Managing Director**