# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 30 JUNE 2024

This statement is made by Frontier Software plc (registered number 02512827) pursuant to section 54 of the Modern Slavery Act 2015 and covers the company and all members of the Frontier Software group of companies. It constitutes our slavery and human trafficking statement for the financial year ended 30 June 2024 and sets out the steps taken that aim to ensure that slavery and human trafficking did not take place in our business and supply chain.

## About Frontier Software

Please see our website – www.frontiersoftware.com/our-company

## Purpose

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Frontier Software has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity in all business relationships, which includes implementing policies and procedures to ensure that there is no modern slavery or human trafficking taking place within the business or our supply chain.

## Supply Chains

Our supply chains include, but are not limited to premises, hardware providers, maintenance services and stationery suppliers. We have reviewed the risks that these supply chains can present and we expect our suppliers and contractors to demonstrate a zero tolerance approach to exploitation. Any supplier found not complying with the provisions of the Act will have their contract terminated.

We have a commitment to conduct our business and all our relationships based on integrity.

During this year we:

- reviewed our anti-slavery and human trafficking policy, which reflects our commitment to:
  - implementing and enforcing effective systems and controls designed to ensure modern slavery does not occur in our business and supply chains
  - being transparent in doing so through our disclosure obligations under the Act
- used risk assessments. Our efforts to prevent modern slavery are designed to be proportionate to the modern slavery risks we face, recognising that it can vary according to the jurisdictions, sectors, suppliers, the amount of control we have over our supply chain and other governance factors. Risk assessments are, therefore, integral to our attempts to eradicate modern slavery in our business and supply chains. Modern slavery risks vary based on the characteristics of each business. The specific manner and methodologies by which these risks are addressed and mitigated vary based upon, among other things, the nature of the risks and of the assets and operations to which they apply, the geographic location of the assets, the economic, political and regulatory environment, and our assessment of the benefits to be derived from such mitigation strategies. While no practices and procedures are capable of identifying and preventing all modern slavery, our risk based approach is designed to enable efforts to be focussed where they are most needed and can most help eradicate modern slavery.

- made available training to our staff on modern slavery risks;
- enabled our Policy to become embedded and understood throughout our organisation through internal and external communication;
- have not needed to subject any employee that breaches our Policy to disciplinary action, which could have resulted in dismissal for misconduct or gross misconduct;
- have not needed to terminate our relationship with other individuals and organisations working on our behalf as they did not breach our Policy. Factors guiding the appropriate action to be taken in a given situation will depend on our control or influence over the entity concerned, the severity of the abuse, the safest outcome for the potential victims and whether terminating the relationship with the entity itself would have adverse human rights consequences; and
- encouraged staff, our suppliers and business partners and anyone else to whom our Policy applies to report any concerns about modern slavery related to its businesses and direct supply chains in accordance with our Code and our whistle blowing policy. Our whistle-blowing policy is designed to make the reporting process as simple as possible.

**Further Steps**

Going forward, Frontier Software is committed to continuously strengthening our due diligence processes in relation to our supply chain to identify where modern slavery and human trafficking risks may exist in our business and supply chains, and to continuously improve and develop our policies, procedures and processes to address those risks.

We continue to inform our staff about these issues and raise their awareness of how to recognise and respond to indicators of human rights abuses.

**Approval for statement**

This statement was approved by the Board of Directors on 30 June 2024.

Michael Howard
Managing Director
Frontier Software plc

Date: 30 June 2024