

MODERN SLAVERY AND HUMAN TRAFFICKING

02 July 2021

This note communicates the commitment of Frontier Economics to abide by the legislation contained within the Modern Slavery Act (2015).

ORGANISATIONAL STRUCTURE

Frontier Economics Ltd (Frontier) is an economic consultancy incorporated in the United Kingdom, with offices across Europe in London, Belgium, France, Germany, Republic of Ireland and Spain.

Frontier is controlled by a Board of Directors and owned by shareholders, all of whom are employees of the organisation.

Frontier provides economic advice to other businesses via telephone, email and face to face consultancy formats.

DEFINITIONS

We consider that modern slavery encompasses:

- a. Human trafficking;
- b. Forced work, through mental or physical threat;
- c. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- d. Being dehumanised, treated as a commodity or being bought or sold as property;
- e. Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

We are committed to preventing slavery and human trafficking within our own business and supply chains and understand that this requires an ongoing review of both our internal practices in relation to our labour force and supply chains.

We have a zero tolerance policy towards modern slavery and will refrain from entering into business, and/or will discontinue any current business, with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to us is obtained by means of slavery or human trafficking. We strictly adhere to the standards required with regards to the relevant employment legislation in Belgium, France, Germany, Republic of Ireland, Spain and the United Kingdom,



We offer no zero-hour contracts and part-time and fixed-term Frontier employees are provided with the same pro-rata contractual entitlements as full-time and permanent employees. If these are not offered, we are able to rely on objectively justifiable grounds. Our employees are offered a competitive remuneration package and we pride ourselves on the additional benefits offered to employees. Regular staff surveys are conducted, on an anonymous basis, to give employees a voice on their individual employment, their department and Frontier as appropriate. Frontier is committed to creating a work environment where career progression and personal development is encouraged and supported.

POTENTIAL EXPOSURE

We consider our exposure to modern slavery to be limited but have taken steps to ensure that such practices do not take place in our business, or the business of any organisation that supplies goods and/or services to us.

In the operation of our business, we consider our main exposure to the risk of slavery and human trafficking to exist in our supply chains and those of our clients.

ACTIONS

We carry out due diligence processes to ensure slavery and/or human trafficking does not take place in our supply chains. We have not, to our knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.

We keep our supplier list under review to ensure it is up to date and in accordance with section 54(4) of the Modern Slavery Act 2015.

We will seek to discontinue business with any first tier supplier or client found by the enforcement authorities to be involved in modern slavery.

We encourage the use of our whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

TRAINING

Upon commencement of employment, all employees attend an HR Induction and are made aware of Frontier policies relating to standards of behaviour that we requires from them. We ensure that 100% of new starters complete the induction within two weeks of commencement of employment.

We also provide specific mandatory training on awareness of modern slavery to everyone within Frontier which will be repeated on regular cycle.



POLICIES

A Whistleblowing policy is in place which encourages the reporting of any wrongdoing which is in the public interest, including offences relating to modern slavery. In addition, we are committed to the UN Global Compact, which can be found here.

APPROVAL AND REVIEW

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and applies to Frontier and all companies associated to Frontier. This statement has been approved by the Board of Directors on 12^{th} July 2021. It is reviewed each financial year (ending 30^{th} April).

PEOPLE DIRECTOR

All concerns regarding modern slavery should be addressed to the People Director.

Signed: Helen Field

Name: Helen Field

Role: People Director

Date: 13th July 2021