

MODERN SLAVERY ACT [2015]

Slavery & Human Trafficking Statement

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", henceforth) 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 is predominately involved in the provision of economic advice to other businesses via telephone, email and face to face consultancy formats ("Services", henceforth).

Definitions

Frontier considers 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

Frontier acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own business and in its supply chains. Frontier understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

Frontier has a zero tolerance policy towards modern slavery. It 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 Frontier in the pursuance of the provision of its Services is obtained by means of slavery or human trafficking. Frontier strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Belgium, France, Germany, Republic of Ireland, Spain and the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

Frontier offers employment contracts on a guaranteed-hours basis only; no offers of employment are made on a zero-hours basis.

Part-time and fixed-term employees within Frontier are provided with the same pro-rata contractual entitlements as full-time and permanent employees. If these are not offered, Frontier is able to rely on objectively justifiable grounds.

Frontier's employees are offered a competitive remuneration package and Frontier prides itself on the additional benefits it is able to offer its employees on a wide variety of platforms. It conducts annual staff surveys on an anonymous basis to give employees a voice on their individual employment, their department and Frontier as appropriate. Commitment to creating career progression in a supportive environment has been rewarded by high rankings for Frontier in well regarded "Best Places to Work" awards.

Potential Exposure

Frontier considers its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business, or the business of any organisation that supplies goods and/or services to it.

In the operation of its business, Frontier's main supply chains are those related to the provision of services. Frontier considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains and those of its clients.

Actions

Frontier carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its supply chains.

Frontier has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.

Frontier has reviewed its supplier list for the current financial year to ensure it is up to date. In accordance with section 54(4) of the Modern Slavery Act 2015, Frontier has contacted (or attempted to contact) all first tier suppliers to set out our zero tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.

Frontier has taken action to monitor reports of modern slavery and ensure that there have not been any instances where suppliers have been involved in activities covered by the Modern Slavery Act. Frontier will also continue to cross-reference reports of modern slavery with our first tier supply chain and client list to ensure this is regularly monitored.

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

Frontier encourages use of its 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. All employees are made aware of Frontier policies relating to standards of behaviour that it requires from them. Frontier will ensure that 100% of new starters will complete the induction within two weeks of commencement of employment.

Frontier also provides training on awareness of modern slavery to those within Frontier who have been identified as having responsibilities in this regard. Frontier will ensure that annual update training is provided.

Policies

Frontier also has a Corporate Social Responsibility Policy which further supports its stance on the Modern Slavery Act. In addition, Frontier has committed to the UN Global Compact. A Whistleblowing policy is also in place which encourages the reporting of any wrongdoing which is in the public interest.

People Director

All concerns regarding modern slavery should be addressed to the People Director. The People Director will undertake an annual review of Frontier's obligations towards eradicating modern slavery within its organisation and supply chains.

Review

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and applies to Frontier and all companies associated to Frontier. It is reviewed each financial year.