

REVIEW: Policy and compliance

Requirements:

Following a Home Office letter indicating that the Home Office intend to commence an audit of compliance on 31st March 2019 of relevant organisations' Modern Slavery Statement, we reviewed our existing Modern Slavery Statement published on our website and identified that we need to update this document to be fully compliant. Sign off was requested from the Board in April of an updated statement, but the Board declined to sign off the document requesting some additional amendments and clarity that all actions referred to in the statement were being adhered to.

As per the below, revisions have been made and evidence provided of compliance: the Board is now requested to sign off this final version for updating on our website (and will make an annual request going forward for an annual statement to be signed off).

Statement & Policy review – Phase 1

Following the request to review the documentation and process, Phase 1 to test the policy and identify anomalies was carried out. This highlighted the follow areas where change was required:

1. Modern Slavery Statement:

Incorrect date and reference to financial year (already corrected in version shared at April Board)

2. Whistleblowing Policy

A policy has been in place on the intranet for a number of years. However, there were some statements that were not adhered to through a process or clear ownership.

3. Independent reporting

Should an employee feel the need to disclose a situation that falls under the Whistleblowing umbrella the existing policy may have impeded independence and confidentiality as it suggested the need to inform several individuals.

No central ownership or compliance monitoring in place

4. Engagement and rollout:

The Whistleblowing policy is included within a large policy handbook making accessibility a challenge, furthermore the likelihood of awareness limited. No specific reference to the policy or statement at induction. Purchasing / finance teams were not aware of the requirements to adhere to clauses/statements in associated polices.

Action taken to address review highlights – Phase 2

Following the completion of Phase 1 above, Phase 2 was undertaken and the following actions taken:

Modern Slavery Statement: Updated to reflect current year, owned by the People Team to ensure that annually following the new financial year the statement is updated and republished via board approval. Final version for the latest financial year attached for approval.

Suppliers: Ownership for clause have now been identified with Finance taking the lead ownership. Action to identify risk suppliers has been undertaken with a register created; at present no suppliers have been identified. Supplier contracts continue to be reviewed and we aim to engage with key Associates and Subcontractors using Frontier template contracts which comply with internal processes/relevant legislation. Where this has not been possible, modern slavery clauses have been scrutinised. External e-mails to our Accounts Payable e-mail address now receive an automatic message which includes set text explicitly indicating that the supplier should comply with Frontier's Supplier Code of Conduct as published on our website (also attached).

Independent reporting/Whistleblowing: To align to best practice an external 3rd party support line has been purchased to allow employees to confidentially seek advice if they have a concern which falls under Whistle blowing. This is an annual subscription and will be reviewed on a continuous basis by the People team.

Internal awareness: A standalone version of the Whistleblowing policy has been created and will be published on the intranet. Furthermore reference to this policy will feature in the People Day 1 induction. Communication to the firm will also be created to ensure location of updated policies is known alongside the provision of the helpline number.

Next Steps – Phase 3

The final phase is to embed the actions into the business as usual activity and will include:

- Continued review on an annual basis of the supplier risk register and supplier engagements
- Work with the 3rd party helpline to maintain best practice policies and communication around whistleblowing
- Schedule annual review to adhere to legal requirements (including Board sign-off of updated statement)
- Increase supplier engagement education of those purchasing on behalf of Frontier to ensure alignment to policy
- Report on an annual basis to the MC any identified risks and action taken
- Monitor new working territories to ensure processes and individual knowledge remain robust