



Frontier Pitts Ltd Anti-Slavery & Human Trafficking Policy

Frontier Pitts Ltd operates nationally across the UK and Internationally. Frontier Pitts manufactures Security Gates, Barriers, Bollards, Blockers and Turnstiles.

We have an Employment Law Policy, which sets out our policy on legislation and training to ensure we remain compliant with current UK employment.

We undertake all reasonable and practical steps, including factory inspections and audits, to ensure that our standards are being implemented throughout the businesses of our suppliers and that local legislation and regulations are complied with. We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately. We will only trade with those who fully comply with this policy or those who are taking verifiable steps towards compliance.

This statement has been approved by our Board of Directors, who will review and update it as necessary on an annual basis.

All personnel are trained in equalities and modern slavery policies during Team Talks and Tool Box Talks sessions and meetings.

The Modern Slavery Act 2015 is an Act of Parliament of the United Kingdom and applies to all Frontier Pitts operations.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- slavery, servitude (coercing someone to provide services) and forced and compulsory labour;
- human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited);
- committing any offence with the intention to commit human trafficking;
- aiding, abetting, counselling or procuring any of the above offences,

all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Company has a commitment to conduct its business and all its relationships based on integrity.



Policy

This Anti-Slavery and Human Trafficking Policy applies to all directors, officers and employees collectively “you”, of the Company who are employed by Frontier Pitts Ltd.

Zero tolerance approach to slavery and human trafficking

Frontier Pitts has a zero-tolerance approach to all forms of modern slavery and human trafficking within its business supply chain and is committed to acting ethically and with integrity in all its business dealings and relationships. It is committed to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in its own business or in any of its supply chains.

Frontier Pitts Board has overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given appropriate training on it and the issue of modern slavery and human trafficking in supply chains.

Frontier Pitts Board is committed to the Policy and has diligently put measures in place that are designed to prevent and detect modern slavery and human trafficking within their business and their supply chain. The Company’s programme in this regard contains the following elements:

1. A policy which articulates the Company’s commitment to prevent violations of the Modern Slavery Act 2015 within its operations and supply chain, being this Policy;
2. Communication of this Policy and all relevant elements of the programme to all employees throughout the Company and to our business partners and supply chain;
3. The assessment of modern slavery and human trafficking risks within the Company and its supply chain and the development of effective, efficient and transparent controls to reduce exposure to those risks;
4. The adoption of anti-slavery wording in contracts;
5. The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers coupled with a requirement that they implement procedures which incorporate the principles of the Modern Slavery Act 2015; and
6. Training of all relevant individuals throughout the Company so that compliance with its policies and procedures is the duty of all relevant employees at all levels and so that individuals can recognise modern slavery practices and take steps to avoid the same.

Frontier Pitts Ltd is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act. In addition to the above, Frontier Pitts provides safe and fair working conditions for all its employees and ensures

that no child labour is employed, in line with minimum age laws, within the countries that it operates. Frontier Pitts expects the same standards from all of its contractors, suppliers and other business partners and as part of its contracting processes, include specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same standards. Pursuant to section 54 of the Modern Slavery Act 2015, the Board of each company making up the Company commits to publishing a public statement annually, setting out the steps it has taken during that particular financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or within its own business.

Compliance with this Policy

Anyone working on Frontier Pitts behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and suppliers must read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of Frontier Pitts Ltd businesses and supply chains is the responsibility of all those working for it or under its control. Those working on Frontier Pitts behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify a Director or Manager of the Company as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. Staff are encouraged to raise concerns about any modern slavery in any parts of Frontier Pitt's supply chains in any supplier tier at the earliest possible stage.

Reporting

Internal reporting is critical to Frontier Pitts success and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith".

If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must notify their manager as soon as possible. If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with their manager.



Frontier Pitts aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. Frontier Pitts is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff member believes that they have suffered any such treatment, they should inform their manager immediately.

Communication & Awareness of this Policy

Training on this Policy and on the risk our business faces from modern slavery in its supply chains will be provided annually (and as otherwise necessary).

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of the Policy

Any employee who breaches this Policy by engaging in or conspires to engage in any modern slavery conduct or human trafficking will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and if warranted legal proceedings may be brought against you.

Frontier Pitts may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy.



G Liddle
Operations Director
Frontier Pitts Ltd
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