

# ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

Anti-slavery and human trafficking statement for Frontier Developments plc ('Frontier') for the financial year ending 31 May 2023.

Frontier has a zero-tolerance approach to modern slavery and human trafficking and will not trade or partner with any business or organisation, either remotely or indirectly, which breaches, or appears to be at risk of breaching the Modern Slavery Act 2015 (the 'Act'). We are committed to preventing acts of Modern Slavery in our supply chain and expect the same high standards from our suppliers.

## BUSINESS AND STRUCTURE

### Our Corporate Structure and Business

Frontier develops and publishes high quality video games for the interactive entertainment sector, and has established relationships with globally renowned partners. In 2023, Frontier acquired Complex Games inc, a 20+ year veteran in the Tactical RPG genre.

Frontier is a public limited company and is incorporated and domiciled in Cambridge, UK and employs approximately 700 people. Our games are sold worldwide. Complex Games is domiciled in Canada and employs over 30 people.

## APPROACH

### The Modern Slavery Act 2015 and how it applies to Frontier

Modern slavery is a complex crime and tackling it requires all elements of the supply chain to play a part. The Act highlights how businesses can actively tackle slavery and encourages them to do so. In respect of our operations, we pay particularly close attention to:

- our supply chain
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- cleaning and catering suppliers
- corporate hospitality

We strive to work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. We are committed to addressing the

risks of modern slavery in our operations and supply chains. We ensure this through the following means:

## **POLICIES**

### **Supplier Code of Conduct**

We also introduced our Supplier Code of Conduct (SCoC) in 2022, of which all our suppliers must acknowledge and adhere to. This SCoC details how to best comply with the Act and provides instructions on how to raise breaches, or suspected breaches, of the SCoC or the Act.

### **Whistleblowing Policy**

We have a clear Whistleblowing Policy which is available on our intranet site and through our Supplier Code of Conduct, ensuring staff and suppliers understand that any genuine concerns over wrongdoing or breaches of law can be raised in confidence without fear of disciplinary action. Employees and Suppliers have the option to raise concerns either in person through Frontier's HR and Management teams or via our web portal.

### **Recruitment Policies**

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine right to work in the UK. We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work and provide information to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to. We expect all employees to conduct business with honesty and integrity and we have a zero tolerance to bribery and corruption.

### **Procurement Policies**

We have established procurement principles which work in conjunction with our guidelines for responsible procurement, emphasising the importance of financial responsibility, ethical behaviour, environmental sustainability, and compliance.

## **SUPPLIER DUE DILIGENCE**

Frontier's supply chains include computer game developers and service providers, hardware manufacturers, videogames publishing services, IT services, conference and venue suppliers, in-house catering services, courier services, building maintenance and cleaning services, food companies, training providers, employment agencies, marketing services, and merchandise suppliers.

We work only with reputable service providers, many of whom are also subject to the Act. We require our supply chains to be transparent, accountable and able to demonstrate compliance with the provisions of the Act, either through their own Modern Slavery Statement, or through further questioning and contractual obligations.

## **RISK AND COMPLIANCE**

We continue to evaluate the nature and extent of its exposure to the risk of modern slavery occurring in our supply chain. We do not consider that we regularly operate in high risk sectors or locations due to the nature of the services that we outsource and the short term nature of most of those outsourced services. Where services are carried out in higher risk locations, we will prioritise contracts with large reputable multi-national companies who also comply with anti-slavery legislation.

Where we identify or suspect a failure to comply with our SCoC or related policies, we will seek to terminate any contractual relationships with the relevant Supplier.

## **FUTURE PLANS**

### **Employee Education**

We will continue to keep our employees informed and raise awareness of how to recognise and respond to indicators of human rights abuses. Where we identify additional training needs for our staff, we will ensure that they understand the implications of the modern slavery laws and can assist in implementing the requirements of the Act effectively.

### **Refining Policies**

In accordance with our continued efforts to educate and raise awareness described above, we encourage employees to voice their opinion and provide any feedback on our policies. We greatly value feedback and always consider any provided when reviewing our policies.

We continue to look at ways to improve our collection of relevant information and to make policy information and guidance more accessible to relevant parties outside the organisation.

### **Supplier Evaluation**

We intend to continue the auditing of our key suppliers and licensing partners in the next twelve months and introduce specific measures where relevant to ensure that our obligations under the Act are passed through our supply chain.

## STATEMENT APPROVAL

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Frontier Development plc's anti-slavery and human trafficking statement for the financial year commencing 1 June 2023 and ending 31 May 2024.

This statement was approved by the Board of Directors on 21 February 2024.

Signature:

*Jonny Watts*

**Jonny Watts**

**Chief Executive Officer**

**Frontier Developments plc**

Date: 26 February 2024