



Modern Slavery Act Statement

Frontera Consulting is committed to conducting global business with high legal and ethical standards. All employees of Frontera Consulting are expected to work to the Code of Conduct adopted by our business in all our regions that we operate in. All Frontera companies must comply with local legislation and regulations.

We do not tolerate slavery or human trafficking in our organization, or by our employees or contractors. We expect all employees in our organization to act with integrity and comply at all times with laws, regulations and rules that apply to us. If instances arise where these expectations are not met, we will act and respond in an appropriate manner.

We have measures in place that seek to mitigate the risk of slavery and human trafficking in relation to our employees and contract workers, including the following:

- We adhere to applicable labour and employment laws, regulations and rules in regions where we operate.
- We make our employment decisions in a non-discriminatory manner.
- We are committed to maintaining a workplace free from harassment, discrimination, violence, retaliation and other disrespectful and inappropriate behaviour. Employees are expected to a safe, respectful and professional workplace.
- Our businesses are expected to abide by all non-discrimination or human rights legislation in the various jurisdictions where we operate. These laws generally prohibit discrimination on various grounds such as race, colour, religion/creed, age, gender, gender identity/expression, marital status, sexual orientation and disability.
- Suspected violations with respect to human rights are reported to Human Resources, which takes appropriate action to review and address the issue. Human Resources reports any human rights policy violations to Frontera's Management team.
- All our employees have a shared responsibility for doing the right thing. We have employee misconduct and complaint policies and procedures, through which employees and external stakeholders can escalate concerns without fear of reprisals.

Sourcing and Supply Chain

It is important that all Frontera Consulting vendors and suppliers conduct business in compliance with local laws and regulations and industry standards.

Child Labor

Frontera expects that all Vendors and Suppliers will not employ any person under the age of 15 (or 14 where local law allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15. Workers under 18 years of age should not perform work likely to jeopardize the health or safety of young persons. All Vendors and Suppliers should also adhere to legitimate workplace apprenticeship programs and comply with all laws and regulations governing child labor and apprenticeship programs.

Involuntary Labor

Frontera expects that Vendors and Suppliers will not use any forced or involuntary labor, whether prison, bonded, indentured or otherwise. Vendors and Suppliers will not require employees to relinquish any personal identification, including but not limited to passports, identification cards or work permits, as a condition of employment.

Coercion and Harassment

Frontera expects that Vendors and Suppliers will treat each employee with dignity and respect, and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse.



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Association

Frontera expects that Vendors and Suppliers will allow freedom of association when allowed by local law, and in all cases respect the right of employees to communicate openly and directly with management and will not intimidate, harass or reprimand employees for doing so.

Working Hours and Compensation

Frontera expects that Vendors and Suppliers will comply with all wage and hour laws as mandated by applicable country law or industry standard, including those relating to minimum wages, overtime, maximum hours, and other elements of compensation. Frontera also expects that non-management employees of Vendors and Suppliers will not routinely work in excess of sixty hours per week. Vendors' and Suppliers' employees should be provided with a minimum of one rest day in every seven-day week.

Statutory Social Security and Welfare Benefits

Frontera expects that Vendors and Suppliers will contribute to all statutory social security and welfare funds to which employers and/or employees are required by applicable laws to contribute, including medical insurance, industrial injury insurance, pension, housing and unemployment funds, as well as contribute to these funds on behalf of all employees in accordance with all relevant laws and regulations.

Employment Records

Frontera expects that Vendors and Suppliers will retain one year of complete and accurate records and documentation, including employment contracts, residence and work permits (if applicable), proof of age documentation, maternity leave records, industrial injury reports, and work time and pay records, relating to employees in manufacturing and operations positions necessary to demonstrate compliance with these Guidelines, other than information and records that applicable law requires Vendor to retain for a shorter period of time.

Health and Safety

Frontera expects that Vendors and Suppliers will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations, ensuring at a minimum, occupational safety, machine guarding, emergency preparedness, industrial hygiene, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation. Any Vendor or Licensee that is a manufacturer will also ensure that the same standards of health and safety are applied in any housing or canteen facilities that it provides for employees.

Environment

Frontera expects that Vendors and Suppliers will comply with all applicable environmental laws and regulations and ensure that all required environmental permits and registrations are obtained, maintained and kept current and that operational and reporting requirements are followed.

HOW TO RAISE CONCERNS

You are encouraged to raise concerns about any issue or suspicions. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your manager and/or Human Resources.

Please sign below to indicate that you have read and understood our Modern Slavery Act Statement.