



Frontier Developments plc

Code of Conduct for Suppliers

Version	Date
1.0	March 2022

Frontier Developments plc (Frontier) is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas underpinned by robust processes. We believe that business should be conducted fairly, honestly and respectfully and we believe that these values should in turn be upheld by all the members of our supply and development chain. That's why when we engage with third parties (**Suppliers**), we ask them to agree to comply with the terms of this Code of Conduct as a condition of doing business with them.

1 Compliance

Local Laws

We undertake thorough due diligence checks on all our Suppliers to ensure we only engage with reputable and responsible companies. We expect our Suppliers to fully comply with applicable laws in their own and where applicable in UK jurisdictions as well.

Suppliers must understand and comply with all applicable laws and regulations, including laws relating to business integrity, employment, health and safety, and environmental protection. Where the requirements of this Code of Conduct exceed what is required by law, these requirements must be met in addition to legal compliance.

Suppliers must abide by all applicable national and international trade laws and regulations including but not limited to antitrust, trade controls, and sanction regimes.

Ethical Practices

Suppliers should conduct their business fairly and in an ethical way, having regard to their own policies, systems and/or procedures in place to ensure the prevention of unethical business practices.

2 Finance

Bribery Act

Frontier will not tolerate any form of bribery by, or of, its employees, suppliers, agents or consultants or any person or body acting on its behalf. We are committed to implementing effective measures to prevent, monitor and eliminate bribery.

A Supplier suspected of committing an act of bribery will be considered to be a material breach of their contract and will have their services suspended whilst a full investigation and report is made and may later have their contract terminated.

Frontier expects Suppliers and their staff to act with highest levels of integrity and any individuals who believe they have identified an incidence of bribery should make a report following the process in the Whistleblowing Policy.

Tax Laws

Suppliers must comply fully with all of their obligations in relation to all taxes due within the territories in which they operate or make supplies. Suppliers must not participate in tax evasion nor facilitate tax evasion by others. Suppliers should take appropriate steps to ensure that all who act for or on their behalf also comply with such obligations.

3 People

Modern Slavery Act

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.

It is the responsibility of Frontier and all parts of our supply chain to ensure compliance with the Modern Slavery Act 2015. You must avoid any activity which could lead to a breach of this policy.

If you believe or suspect that there is, or may be, a breach of this policy you should report it as soon as possible either to the Director of Operations or via our whistleblowing procedure.

If you are unsure whether a practice or procedure in any part of our supply chain is in breach of this policy or contravenes the Act, then you should still raise it with the Director of Operations or via our whistleblowing procedure.

As with our whistleblowing procedure, our aim is always to encourage openness and to encourage anyone to make a disclosure or raise

a concern where they see it in the business or the supply chain. Disclosures made in good faith through this policy will be treated fairly and investigated fully. Individuals making a disclosure should be assured that Frontier will act in good faith towards them and will ensure that they do not suffer any detrimental treatment as a result of making a report in good faith.

Compliance with this policy is a condition of our contract with you. Any person, business partner or contractor found to have breached this policy who breaches this policy will have their contracts with Frontier terminated.

Child Labour

Suppliers must never involve child workers of age 15 years or younger at any point in the delivery or supply of goods and services to Frontier.

Fair Wages

Suppliers shall ensure that working hours, wages and overtime pay in compliance with all applicable laws with the purpose and intention of the relevant law. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.

Discrimination

Frontier will not permit discrimination in any form, based on race, colour, language, nationality, ethnic or social origin, religious belief, political opinion, gender, marital status, disability, property, birth, age, sexual orientation.

4 Sub-contractors

We expect Suppliers to have robust processes in place to ensure that the sub-contractors in their supply chain also comply with the requirements of the law, and where they engage in work on behalf of Frontier, to ensure that they are compliant with the requirements of this Code of Conduct.

5 Security

Information Handling

Suppliers are required to respect the confidentiality of information which is shared with

them and to ensure the proper handling and protection of business data and intellectual property from misuse.

Suppliers connecting to Frontier's network or delivering assets/ code to Frontier will also be required to comply with our Security Policy as revised from time to time.

Audit

Suppliers should engage openly and honestly with any audit or questionnaire provided by Frontier which may be required from time to time. Failure to deal honestly and truthfully with any audit or questionnaire will be viewed as a serious non-compliance.

6 Integrity

Reporting

Frontier is committed to running its business to highest ethical standards by conducting its business honestly and fairly and by putting in place policies and practices that ensure that our staff, suppliers, partners and contractors know what is expected of them. We believe that in order to achieve this, Frontier should be an open, inclusive, safe and transparent place.

On occasion however, staff or contractors may identify some wrongdoing and in those circumstances we expect them to act with integrity and to raise those issues with us. Individuals should feel safe raise issues of wrongdoing or of genuine concern, in the knowledge that it will be treated on a confidential basis and with the utmost care and seriousness.

Frontier has a whistleblowing policy in place to allow individuals to raise concerns where they find them. This policy applies to all staff, suppliers, partners and contractors of Frontier and sets out the process by which individuals can make a report or disclosure to Frontier and the steps that will be taken to action it, and what an individual making a protected disclosure has the right to expect from us.

Frontier's Whistleblowing Policy may be found [here](#)