

Modern Slavery Act Statement

Overview

The introduction of the Modern Slavery Act 2015 (the Act) requires companies to be transparent about what they are doing in respect of the welfare and wellbeing of its employees and those working on its behalf. By promoting equality throughout the organisation and by increasing supply chain accountability, workers will be protected and consumers will have greater confidence in the goods and services they buy from us.

The Act defines that a commercial organisation must prepare a slavery and human trafficking statement (the Statement) for each financial year of the organisation if it supplies goods and services and also has a total annual turnover of not less than an amount prescribed by regulations. Whilst the Frontier Medical Group (Frontier) is not, at present, required to provide a statement on such accountability we recognise that as an employer and supplier we should strive to demonstrate the ethical behaviour and conduct of our business operations with honesty and integrity.

This Statement therefore sets out the information required by the Modern Slavery Act 2015 and explains our approach to preventing acts of slavery and human trafficking in both our labour practices and supply chain. Frontier is wholly committed to respecting human rights across our own operations, supply chains, and products and we expect our business partners to support this Statement and act in accordance with it.

Structure

Frontier is a UK manufacturer and supplier of a range of medical devices to both the UK and international healthcare markets. We manufacture the majority of products on site and have a variety of raw material and other suppliers both locally in the UK and overseas.

The head office and core manufacturing facilities are all located in Blackwood, South Wales across two modern sites. Frontier, including its wholly owned subsidiaries, are private limited companies registered with Companies House in the UK. It has a clearly defined Board of Directors (the Board) and Management Team, with clearly defined and transparent communication channels throughout the business. Roles, responsibilities, and reporting lines are also well established throughout the business with any changes well communicated to all those affected.

Frontier's behaviour is based on nine core values of professionalism, respect, accountability, honesty, commitment, flexibility, innovation, team work and continuous improvement (the Core Values). These Core Values were developed and agreed internally with the employees and are displayed across the site for employees/visitors to see. They are actively promoted to ensure observance of Frontier's standards of ethical behaviour.

Labour Policy

Frontier is a good employer and the conditions of work at Frontier are of a high standard. We provide decent and fair conditions of work with regards wages which are paid directly to the employees, subject only to deductions permitted by law. Compensation for overtime is in accordance with prevailing laws and regulations and Frontier respects the prohibition of mandatory/enforced overtime. Frontier also provides decent and fair conditions of work with regards hours of work, weekly rest, holidays, health and safety, maternity/paternity protection and the ability to combine work with family responsibilities. Frontier provides a work-life balance that is at least comparable to that offered by similar employers.

Should anyone have any concerns regarding our labour practices, we have mechanisms in place for people to raise comments (anonymously if preferred). Such mechanisms include our transparent Whistleblowing Policy and the continuous improvement suggestion boards located throughout the business. Frontier respects the life of individuals, including their freedom of opinion and expression, and it does not suppress anyone's views.

Frontier does not engage in activities that infringe, obstruct or impede the economic, social and cultural rights of any person.

Frontier strongly believes in fundamental rights at work that include the freedom of association, the elimination of forced labour, the abolition of child labour and the elimination of discrimination regarding employment and occupation. We are fully compliant with all associated legislation that exists in the UK.

Supply Chain Policy and Due Diligence Processes

Frontier will not support or deal with any business knowingly involved in slavery or human trafficking. We are therefore committed to ensuring that there is no such activity in our supply chain. Our procurement activities encompass the planning and management of all activities involved in sourcing, procurement and logistics management. This includes coordination and collaboration with our partners, which can be suppliers, service providers and customers.

We ensure that all potential and incumbent suppliers are dealt with professionally, fairly and ethically and that we uphold the principles of sustainable procurement at all times. We favour suppliers that operate under recognised ethical codes of conduct and so our Ethical Sourcing Policy and Supplier Code of Conduct is circulated to all potential and incumbent suppliers. Suppliers are required to acknowledge and agree to the terms of these (or provide details of their equivalent policies) to ensure the relationship is maintained.

We conduct regular supplier audits using a prescribed 'supplier evaluation template' questionnaire. This addresses areas such as accreditation, human resource policies, ethical sourcing and supplier code of conduct, anti-bribery, quality systems, manufacturing inspection and testing, equipment maintenance, returns and complaints processes, internal audits.

Risk of slavery and human trafficking

We consider the risk of slavery and human trafficking in our labour and employment practices to be negligible. We are a highly professional business and the labour practices and policies highlighted above ensure that we continue to provide employment opportunities free from discrimination, modern slavery and human trafficking.

There is an inherently increased risk within our supply chain as we are at least one step removed from operations and labour practices. However, our supply chain policy and methods for selecting suppliers greatly mitigates the risk. We also conduct routine and regular supplier audits and require all suppliers to sign up and adhere to our own Ethical Sourcing Policy and Supplier Code of Conduct.

We consider the steps we are taking, and continue to take, are effective in ensuring we are not, to the best of our knowledge, exposed to modern slavery and human trafficking. We have several communication channels and mechanisms for reporting concerns (anonymously if preferred) and we record and report any instances of concern raised. Immediate action is taken where appropriate.

Training and further development

The senior management in the business, and the procurement team, have been trained on the issue of modern slavery. Arising from this we amended our supplier evaluation template to include more aspects of human resourcing and ethical supply. In 2016 we also updated our Ethical Sourcing Policy and Supplier Code of Conduct to ensure they reflected latest industry practices and regulations.

We believe that further improvements are most likely to come from increased collaboration with our suppliers, including increasing the depth and breadth of supplier assessments and audits. To assist with this, a key objective for the coming year is to collaborate with a professional third party (e.g. Sedex) to supplement our risk assessment processes, share results of supplier audits and reduce fatigue for suppliers.



Simon Jackson
Managing Director



Matthew Bambery
Finance Director & Company Secretary