

## **The Supplier Conduct Policy**

Frontline Ltd ('Frontline') operates an integrity based approach to our supply chain and to our social responsibilities, and look to work with suppliers who share our values.

Where appropriate we will work with our supply chain to make sure that they have the right policies and processes in place to demonstrate that they, in turn, will use the same principles within their own supply chain. We shall also consider these principles when we are choosing suppliers to work with.

The principles of our approach are based on complying with legislation and regulations, and by this we mean the laws and regulations that apply to the jurisdiction that suppliers operate in. However, this compliance is the minimum standard and we will always look to exceed these standards where possible.

Frontline will always treat all actual and potential suppliers fairly, equally and objectively. All reasonable attempts will be made to assist suppliers to overcome difficulties and to improve their performance for us. All our suppliers should uphold the highest standards of integrity, transparency and governance and we require suppliers to adhere to service level agreements which are underpinned by such concepts.

As part of our informal approach to our supply chain, the environment and social responsibility are areas that Frontline considers key to promote good sustainable practice in. These areas reflect the broad principles of our approach:

### **Employment is freely chosen**

Your employees should be free to leave their employer after giving reasonable notice and are not required to lodge deposits or payment with their employers. There should be no forced, bonded or involuntary labour. Specifically, suppliers must not engage in modern slavery or human trafficking or other actions covered by the Modern Slavery Act 2015 and take all reasonable measures to ensure its full supply chain does similarly not engage in any such acts. Your employees should have a written contract of employment, which needs to comply with local legislation and be clear about wages. Wages and benefits need to be in accordance with relevant legislation. All deductions from wages should be lawful and with the expressed permission of the employee.

### **Freedom of association**

Your employees should be free to join or form trade unions and to bargain collectively, in accordance with relevant legislation. Your employees should not be discriminated against for their membership of trade unions, or representative functions.

### **Working conditions are safe and hygienic**

A safe and healthy working environment should be provided, with hazards minimised and adequate steps taken to prevent accidents and injury occurring in the course of work. Appropriate policies and procedures should be in place and responsibility should reside with a senior management representative.

### **Child labour should not be used**

The recruitment and use of child labour should be banned/prohibited in any circumstances. Any young persons (between 16- 18 with parental consent if appropriate) should not be employed in hazardous conditions or be allowed to work at night, unless certain exceptions apply in line with legislation applicable to the jurisdiction that the supplier operates in.

## **Working hours are not excessive**

Working hours must comply with national laws, collective agreements and all overtime must be voluntary. Your employees should have access to rest periods and employee time off.

In any event, workers should not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average.

## **No discrimination should be practiced**

There should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, social or ethnic origin, religion, age, gender, marital status, sexual orientation, disability, maternity or union or political affiliation. Where required policies on diversity, discrimination, harassment and whistleblowing should be in place.

## **Treating employees with respect**

Your employees should never be exposed to abuse, harassment, discrimination or intimidation. Your employees should have access to a grievance procedure.

## **The environment**

Where possible we will choose a supplier that has environmental accreditation beyond the minimum required. Practically this means we would expect promotion of recycling and provision of appropriate recycling services, in addition unneeded equipment and furniture should be disposed of in an environmentally responsible way.

## **Staff Code of Conduct, Bribery and Modern Slavery**

Frontline operates a Staff Code of Conduct and has policies in place to address the Bribery Act 2010, and as a minimum we expect all our suppliers to adhere to relevant legislation. Please be aware inappropriate gifts will be returned and only modest hospitality should be offered.

Our policies in place to address the Modern Slavery Act 2015 and our Modern Slavery Act 2015 statement can be found on our company website.

## **Breaches of this Policy**

A breach of this policy amounts to a material breach of the agreement and/or arrangement between us and we may terminate our relationship with you if you breach this policy.

Updated June 2017