

MODERN SLAVERY STATEMENT

INTRODUCTION FROM THE CEO

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in our wider supply chain. The Frontline Group is committed to ensuring slavery and human trafficking is not taking place anywhere within our businesses or our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the current financial year.

ORGANISATION'S STRUCTURE

Frontline Ltd operates within the magazine sales and distribution industry and is a joint venture between Bauer Media, Immediate Media Company and Haymarket. It has 100% shareholding in Seymour Distribution which operates in the 3rd party distribution market, and Seymour International which exports magazines to over 90 countries.

The formation of the Frontline Group followed the acquisition of Routes to Retail focusing on specialist and non-traditional retail outlets and Gold Key Media, which creates bespoke solutions in print and digital format, for the business, leisure and event industries across the world.

With a workforce of circa 280, the Frontline Group manages the distribution of more than 300 million magazines and newspapers a year. This statement is made on behalf of the UK operations and international distributors of Frontline Ltd, Seymour Distribution Ltd, Seymour International Ltd, Routes to Retail Ltd and Gold Key Media Ltd.

OUR BUSINESS

The Frontline Group manages the end to end magazine distribution from printer to store, international venue and global event. This involves managing relationships with Printers, Carriers, Wholesalers and Retailers on behalf our Publishers.

Businesses within the Frontline Group maintain clear independent focus on their respective clients, publishers, retailers and other venue outlets.

RESPONSIBILITY FOR ANTI-SLAVERY INITIATIVES

The primary responsibility for understanding modern slavery and putting in place process and training lies with our Legal Compliance Director, who has responsibility for the production of the Modern Slavery Statement. Any identified instances of slavery will be reported to the Legal Compliance Director.

OUR SUPPLY CHAINS

Our supply chain includes:

- Wholesalers
- Carriers
- Printers and finishing houses
- Subscription and mailing houses
- Technology suppliers
- Professional Services
- Facilities services
- Suppliers of promotional material/items
- International Distributors

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Supplier Conduct Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our objective is to ensure that we only work with suppliers who treat their obligations towards modern slavery with the same importance as we do.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have systems in place to:

- Identify and assess potential risk areas in our supply chains

- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risks areas in our supply chains
- Protect whistle blowers

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect contractors and all those in our supply chain to comply with our Supplier Conduct Policy.

Our supplier terms and conditions require suppliers to comply with our Supplier Conduct Policy thereby reducing the risk of modern slavery and human trafficking in our supply chain. We undertake an audit annually requiring our suppliers to confirm their compliance.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will communicate our Anti-Slavery and Human Trafficking Policy and provide annual training to all members of staff.

We have policies in place to ensure that we meet our responsibilities to respect and protect human rights, including in relation to modern slavery, including policies covering: access to information; safety, security and wellbeing; access to grievance and remedies; discrimination and human rights.

This statement has been approved by

Frank Straetmans

Frontline Group

June 2021