

Grievances and Whistleblowing

Overview

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Purpose & Scope **Resolution Process Reporter's Protection &** Confidentiality Awareness & Training



Purpose & Compliance

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- **Goal:** Frontify is committed to maintaining a culture of ethical conduct and accountability. to report general workplace concerns and serious misconduct and to ensure that issues are investigated impartially and resolved appropriately.
- Who it applies to: All employees, contractors, suppliers, customers, and other stakeholders of Frontify AG and its subsidiaries.
- □ What can be reported:
 - financial misconduct, such as fraud, corruption, improper gifts or facilitation payments, labor conditions,
 - harassment or discrimination,
 - violations of company policies or legal infractions,
 - retaliation related to a whistleblowing case,
 - general workplace concerns and grievances, such as interpersonal conflicts, work environment issues, and operational challenges,
 - and other serious matters.
- □ **Compliance:** The policy is aligned with the EU Whistleblower Protection Directive (2019/1937), Swiss law, US and UK regulations, and other relevant regulations. Data protection is also guaranteed.

Through this system we aim to provide a secure and confidential channel for our key stakeholders



Resolution Process

Anonymous Reporting

- **Secure submission platform:** Reports can be made anonymously via a third-party platform accessible to employees (through Personio) and external stakeholders (via Frontify's website). Alternatively, reports can be made via email or directly to the manager.
- □ Anonymity guaranteed:
 - No personal information is required or collected during the submission
 - Redirection ensures there's no link to internal systems like Personio
 - Communication with case managers is possible through a unique case code
- **Confidentiality:** Access to cases and final reports is strictly limited to designated case managers or individuals with a direct need-to-know role in the investigation.

Reporting Channels & procedures

□ Main Method (Anonymous):

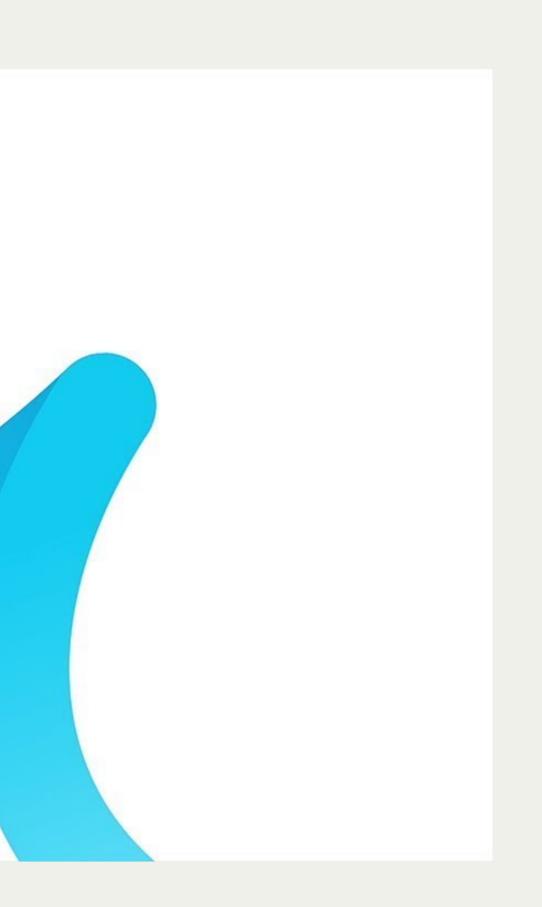
- Submit via: <u>https://frontify.personiowhistleblowing.com</u>
- No personal data required
- Case code to, anonymously:
 - Track progress
 - Get or share updates •
 - Receive final outcome •
- □ Other Methods (Not necessarily anonymous):
 - Email: legal@frontify.com or hrsupport@frontify.com •
 - In person: Speak to the Manager or People Partner

Personio Whistleblowing

Personio Whistleblowing

A dedicated anonymous reporting channel for your employees.

Frontify



Internal Case Handling Process

\square Initial review:

- Two trained case managers (one from Legal and one from People) assess all reports, maintaining objectivity and legal compliance
- □ Investigation procedure:
 - Confidential evidence collection and interviews
 - Escalation to senior management or external parties, when necessary

□ **Timelines**:

- Acknowledgment of receipt within 7 business days
- Substantive update provided within 3 months
- Aim to resolve and close within 6 months unless complexity requires more time
- Communication with whistleblowers:
 - Updates are available through the unique case code
 - No direct contact or identity disclosure is required for updates
 - The results will be shared at the end of the investigation

Escalation, Bias Prevention, External Reporting

Escalation process:

- Handled by the VP People and Legal Lead
- Further escalated to the Board of Directors, if necessary
- Independent oversight:
 - If a case involves senior leadership or Legal/People Teams, an external review panel or legal counsel can be brought in
- □ Bias prevention:
 - Whistleblower's identity is protected
 - Conflict of interest checks for all reviewers
- **External reporting rights:**
 - Individuals can report directly to regulators or authorities when internal systems fail or retaliation risk is perceived

• This ensures alignment with legal rights and reinforces Frontify's commitment to transparency



Reporter's Protection

Reporter's Protection & Support

- □ Reporter's identity is protected:
 - □ Anonymity of the Reporter creates a first layer of protection to avoid any retaliatory acts
- □ Zero tolerance for retaliation:
 - Protection against dismissal, demotion, threats, harassment, or discrimination
 - Covers both reporter and those assisting them ("facilitators")
- **Reporting retaliation:**
- □ Support during the process:
 - Reporter may request assistance via the platform or by contacting the Legal or People Teams
 - Comprehensive support ensures reporters are not isolated and understand their rights throughout the process
- Encouragement to report in good faith
 - □ Cases reported honestly and with reasonable suspicion are protected, even if the reported issue turns out to be unsubstantiated.

• Retaliation concerns can be reported confidentially directly to the VP People and Head of Legal



Awareness & Training

Communication, Training & System Review

□ Training:

- All employees receive regular training on how to recognize and report misconduct
- Training includes legal rights, reporting procedures, and anti-retaliation protections

□ Onboarding:

• The system is part of every new employee's onboarding package to promote early awareness

Communication channels:

 Policy is readily available on internal systems and the system is regularly communicated through HR/legal updates

Ongoing evaluation:

• Policy and system reviewed periodically and updated as necessary to reflect changes in law, internal structure, or risk environment

Responsibility:

• Legal and People Teams are responsible for ensuring the system as well as the policy is current, effective, and clearly communicated



Thank you