



# Grievances and Whistleblowing



# Overview

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4. Awareness & Training





# Purpose & Compliance

# Purpose & Compliance

- **Goal:** Frontify is committed to maintaining a culture of ethical conduct and accountability. Through this system we aim to provide a secure and confidential channel for our key stakeholders 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.



# 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: <https://frontify.personiowhistleblowing.com>
  - 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.





# Internal Case Handling Process

- **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:**
  - Retaliation concerns can be reported confidentially directly to the VP People and Head of Legal
- ❑ **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.





# 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