

# Frontify Modern Slavery and Human Trafficking Statement for the year 2024

## Intro

Frontify believes that striving to become a responsible business player in today's world and, in particular, in the digital arena is an ethical duty. Our motto, "We shape the future," is part of our core shared beliefs, and we take our responsibility to lead by example very seriously. This also includes respecting workers' rights. Frontify ensures that the rights of all individuals in the workspace are respected without any exception, especially in terms of guaranteeing an appropriate work-life balance for all employees and rejecting all forms of human trafficking and modern slavery, as enshrined in Article 4 of the Universal Declaration of Human Rights.

Frontify is committed to protecting all applicable international and national human rights standards and requirements that uphold the highest respect for the fundamental rights of the individual, including but not limited to the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the eleven core ILO conventions for the protection of labor rights, the UK Modern Slavery Act 2015, title 2 of the Federal Constitution of the Swiss Confederation, federal and local US laws, and any other human rights principles applicable to Frontify both as an actor both in the land of human rights and in the tech industry.

This Modern Slavery and Human Trafficking Statement for the year 2024 is made on behalf of Frontify AG, a Swiss corporation duly registered in the Canton of St Gallen, with registration number CHE-253.260.210, as well as on behalf of all the subsidiaries of Frontify AG, namely: Frontify Inc, located in New York City, USA, Frontify UK Ltd, with offices in London, UK, Frontify GmbH, our German entity, and Twicpics SAS, a French tech start-up that was acquired by Frontify in 2023. All together, these entities compose the Frontify Group.

## Company Overview

The Frontify Group conducts its business globally with offices and employees located in Switzerland, the European Union, the United Kingdom, and the United States of America. The SaaS solution developed and licensed by Frontify is a brand-building platform where visionaries and brand builders create, organize, and collaborate on magnetic brands. Frontify empowers companies to scale brand storytelling that resonates deeply with their audience.

## Our policies and processes

Our commitments to respect, protect, and enforce human rights within the Frontify Group and in our daily business lives are crystallized in the five ethical pillars that compose the [Frontify For Good](#), which is our code of conduct. We believe that raising employee awareness about essential responsible practices and sharing them with business partners can foster relationships of mutual respect and trust.

**“We uphold human and labor rights”** is the first of our pillars of ethics. It expresses strongly and loudly our commitment to preventing, refusing, and reporting any risk of forced and involuntary labor and defines our commitment to acting ethically and with integrity throughout our daily business life.

One of the principles of this pillar is that every employee’s rights and freedoms are guaranteed and protected. Therefore, we reject all forms of forced and compulsory labor, as well as all forms of modern slavery and human trafficking. We reject the practice of bonded labor, including the use of employment bonds to recover costs incurred for employee training or other educational activities.

Another principle is the absolute prohibition of child labor and the protection of the rights of young employees to schooling and education in general. We abide by the applicable national regulations regarding the minimum age for admission to employment. In the absence of such national regulation, we refer to the relevant guidelines of Convention C138 of the International Labor Organization (ILO). According to this Convention, under no circumstances, except in the specific cases set out in Articles 6 and 7 of the Convention, may a child under 15 years of age be employed. Additionally, we ensure that the health, safety, and development of our young employees under the age of 18 are safeguarded through employment agreements approved by the competent national authority. This is especially true for our apprenticeship programs, which are organized by Frontify in our product and human resources departments.

There are no restrictions on employees regarding the use of the office space: everyone is encouraged to organize their weekly schedule between days to be spent at the office and days of remote work. Lastly, every employment relationship is concluded on a voluntary basis, and employees have the contractual right to terminate at their discretion and within a reasonable notice period.

**“We embrace ethics and integrity”** is our second pillar and encompasses three core emblematic principles of Frontify’s strong commitment to conducting business leading by example. These three principles differentiate between our compliance with the law, in general, the responsibility to manage our supply chain responsibly, and our zero-tolerance policy against all forms of corruption.

**We’re committed to the highest standards of integrity and responsibility towards all our stakeholders.** To meet those standards, we, foremost, abide by applicable laws and regulations in force in the countries we operate. We also conduct internal awareness training to ensure every employee takes compliance seriously and follows the relevant internal policies and procedures. We communicate frequently and transparently, internally and externally, about any change to the applicable regulations that would require adaptation in our daily operations accordingly. We constantly monitor compliance with applicable laws and regulations and take immediate action to remedy any spotted violations.

**We handle our supply chain responsibly.** We apply objective criteria when engaging with external third parties, such as competitiveness, quality, objectivity, correctness, and respectability. We do business exclusively with those external parties who can ensure high standards of compliance, ethics, and integrity which are substantially equivalent to our own standards; this being an essential precondition to the establishment and continuation of any business relationship. We keep records of all our existing contractors, regularly monitor our business relationships, and instruct employees to abide by the internal processes for the engagement of any new contractor. Such engagement may be finalized only after legal, financial, and security assessments have been successfully completed and certain key contractual provisions have been negotiated and secured. These include at a minimum, the right to audit the contractor's compliance with the law and the contractual agreement, as well as the right to terminate our contractual relationship at any time if we discover any breach of relevant national and international human rights principles.

**Frontify's due diligence commitments in evaluating, monitoring, and reporting risks connected to slavery and forced labor.**

We believe that everyone within the Frontify Group and in our supply chain shall have the duty to monitor, detect, prevent, and report any violation of fundamental individual and collective human rights. For this reason, all employees and suppliers can always write to [legal@frontify.com](mailto:legal@frontify.com) to notify a suspected violation of human rights in the workplace. In addition, the Human Resources department of Frontify has a dedicated team of employees whose main task is to act as a liaison between the company and the employees and to listen to employees' concerns, fears, doubts, and complaints about their current working conditions and of anybody else they believe is suffering from that.

Due to the nature of Frontify as a SaaS company, Frontify's key suppliers consist mainly of tech suppliers, such as data centers that host our platform and our customers' environments, (b) other tech providers that operate a portion of the platform or that assist the Frontify Group in its daily operations; and (c) various suppliers who enable Frontify to operate its facilities, such as food and beverage suppliers, cleaning and maintenance services, recycling companies, and others. Thus, Frontify believes that the risks of forced labor and slavery are minimal outside our workforce. So far, Frontify has not identified any suppliers that could be considered high-risk as we believe that threats from modern slavery and human trafficking are more likely to be posed by suppliers providing manual labor, such as food and beverage suppliers, suppliers working in event management, especially in the support sector, as well as suppliers providing maintenance services. Nevertheless, in principle, Frontify only engages suppliers that are part of our local communities, and when this is not possible, suppliers that have proof-record of compliance with all local labor standards applicable to their workforce. Even if Frontify makes all possible efforts for an industry of our size to exclude any form of slavery, human trafficking, and forced labor and believes that such a risk is almost non-existent in our supply chain, at the moment, a complete exclusion of such risk is not possible,

## Next Steps

At the end of 2023, Frontify presented a final and comprehensive CSR/ESG strategy to achieve the milestone of becoming BCorp Certified by the end of 2024. Our policies, internal documents, processes, and training are periodically revised and updated. The Frontify Modern Slavery and Human Trafficking Statement for the year 2025 shall be taken into account and updated in accordance with the results achieved by the Frontify Group in the current calendar year.

This statement applies to the financial year from January 1st to December 31st, 2024.

Roger Dudler   
Chief Executive Officer

Felix Hupfauf   
Chief Financial Officer