



# Supplier Code of Conduct

Last updated: May 2025

## 1. Preamble

Frontify offers an online software solution to empower companies to build strong, consistent, impactful brands. In pursuing its vision, Frontify recognizes its responsibility to integrate and maintain ethical business practices throughout its operations and across its entire supply chain. Our articles of association recite that Frontify shall “strive for a material positive impact on society and the environment.” Thus, we expect all our suppliers, service providers, and subcontractors (“Suppliers” or “you”) to comply with the principles set forth in this Supplier Code of Conduct (“Code”). This Code outlines our expectations that you integrate and uphold ethical, legal, and sustainability standards across your operations throughout the course of our partnership.

Our corporate responsibility is anchored in five non-negotiable pillars: upholding human and labor rights, embracing ethics and integrity, prioritizing privacy and data protection, promoting environmental responsibility, and respecting customers’ interests. These principles form the foundation of our business relationships and are intended to generate a positive impact on the environment and communities in which we operate.

This Code is grounded in internationally recognized standards, including the International Labour Organization (ILO) Conventions and Recommendations, the United Nations Charter, and the Universal Declaration of Human Rights. These represent the minimum expectations for compliance. However, if local laws applicable to you or this Code set stricter standards, the more rigorous standards shall apply.

By accepting this Code, you commit to implementing and maintaining these standards within your operations and to ensuring your subcontractors and business partners do the same. Non-compliance with these standards will lead to immediate termination of our business relationship unless you promptly and formally commit to implementing corrective measures within a reasonable timeframe.

## 2. General principles of ethics and integrity

In order to maintain the highest ethical standards and foster a long-term business relationship, you shall adhere to the following principles and practices, which constitute material terms of our agreement.

### a. Ethical Practices

Integrity, transparency, and accountability are core to our business partnerships. Accordingly, we expect you to:

- implement and enforce a zero-tolerance policy against all forms of bribery, corruption, extortion, embezzlement, and kickbacks, whether direct or indirect;
- establish internal controls and monitoring mechanisms to prevent, detect, and remediate unethical conduct, ensuring compliance with anti-corruption laws and internal policies and best practices related to offering and receiving gifts;
- conduct all business activities ethically, fairly, and in good faith, avoiding any form of misrepresentation, fraud, or manipulation;
- comply with applicable antitrust and competition laws, promoting open and fair competition in all markets where you operate; and
- protect confidential information and respect intellectual property rights, including both our proprietary information and that of any third party, through appropriate technical and organizational measures.



Additionally, any conflicts of interest that could compromise business integrity must be promptly disclosed to us in writing by contacting us via [legal@frontify.com](mailto:legal@frontify.com) and managed responsibly.

#### b. Compliance with Laws

As our business partner, you're required to comply with all applicable local, national, and international laws, regulations, and industry standards. These includes, but is not limited to, legislation governing anti-corruption, data protection, labor rights, intellectual property rights, and environmental protection.

You must fully comply with all applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR), the California Consumer Privacy Act CCPA, and other relevant privacy regulations. You're expected to:

- implement and maintain appropriate technical and organizational measures to protect personal data;
- ensure your personnel are regularly trained on data privacy principles;
- actively protect the privacy rights of employees, customers, and any other individuals whose data you process; and
- maintain detailed records of your data processing activities and make these available to Frontify upon request.

### 3. Human rights and health and safety

Our commitment to human rights, occupational health and safety, and environmental protection is rooted in the values enshrined in the United Nations Charter and the Universal Declaration of Human Rights. These principles are essential for employee well-being and our mutual long-term success.

You're required to comply with the following mandatory standards:

#### a. Human rights

All individuals throughout your operations and supply chain must be treated with dignity and respect. You must adopt comprehensive written policies and procedures to prevent and actively combat discrimination based on ethnicity, gender identity, religion, sexual orientation, disabilities, age, national origin, marital status, or any other characteristic protected under applicable international human rights standards. Additionally, you must promote equal opportunities and fair treatment for all employees.

#### b. Occupational Health, Safety, and Emergency Preparedness

Ensuring the health and safety of employees must be a top priority. You're expected to provide a safe working environment supported by proper training and protective measures. Tools, machinery, and buildings must be regularly maintained to ensure workplace safety.

To enhance preparedness, you must:

- perform an assessment of health and safety risks at least annually;
- maintain and regularly update comprehensive emergency response plans; and
- guarantee access to sanitary facilities, clean water, and hygienic conditions.

#### c. Labor Practices

People are at the core of every successful business. Therefore, we expect you to uphold the highest standards of labor practices by fostering a workplace in which all employees are treated fairly, with dignity and respect, in accordance with all applicable laws and regulations.

Specifically, you're required to:

- strictly prohibit all forms of forced labor, child labor, and human trafficking, and implement robust controls to prevent such practices throughout your operations and supply chain;

- ensure fair compensation, benefits, and working hours in accordance with applicable laws and collective agreements;
- respecting employees' freedom of association and right to collective bargaining, including the right to join or not join trade unions without fear of retaliation; and
- foster a work environment that is open, inclusive, and free from harassment, coercion, or intimidation.

d. Diversity, Inclusion and Belonging (DIB)

You are expected to actively promote equity and inclusion across all levels of your organization. This includes:

- implementing measures for equitable recruitment, hiring, and promotion practices;
- ensuring a workplace that is free from discrimination, bias, or exclusion based on personal characteristics or background; and
- fostering an environment in which all individuals have equal opportunities for growth, development, and advancement.

As part of our commitment to DIB, we strongly encourage you to conduct an annual survey addressing diversity, labor practices, and inclusion metrics and to share aggregated survey results with Frontify to support continuous improvement and alignment with the expectations outlined in this Code.

4. Environmental Protection and Sustainability Requirements

As part of our commitment to reducing the environmental impact of our operations, we expect you to comply with all local and international environmental laws and standards. Effective waste management, including responsible recycling and disposal practices, is essential to minimizing environmental harm.

As part of your environmental sustainability, you should:

- use resources efficiently by conserving energy, water and raw materials;
- implement pollution control measures to reduce greenhouse gas emissions;
- make reasonable efforts to monitor and report transparently on key sustainability metrics (energy usage, waste management, carbon emissions, and water consumption); and
- make reasonable efforts to reduce their carbon footprint and contribute to achieving the goals of the Paris Agreement.

By prioritizing environmental responsibility, we can collectively safeguard natural resources and contribute to a more sustainable future.

5. Mandatory Compliance Requirements and Enforcement

The following sections outline the enforcement mechanisms, including legal consequences and remedies, to ensure compliance with this Code.

a. Reporting, Monitoring, and Verification

To foster transparency and continuous improvement, we reserve the right to conduct regular evaluations, including but not limited to self-assessments, questionnaires, and on-site inspections. We may request audits with reasonable notice (minimum five business days, except in emergencies or suspected material breaches), with you bearing all reasonable and documented costs. In the event of identified non-compliance, you're required to:

- promptly develop and implement a corrective action plan, including clear milestones and deadlines;



- submit the plan for our review and input (not later than 60 days of Frontify's relevant notification) and incorporate any additional recommendations we may reasonably provide; and
- demonstrate measurebale progress within a timeframe that we deem reasonable under the circumstances.

To support ethical conduct and early detection of any wrongdoing, we have developed a whistleblowing channel. As our trusted partner, you're encouraged to use this channel to report any illegal, unethical, or non-compliant behavior encountered during our business relationship. This system, which is accessible to all, guarantees not only the confidentiality of the reporting party's identity but also the confidentiality of the identity of the persons concerned by the report and of the information gathered in this context. The reporting system is available at the following link: <https://frontify.personiowhistleblowing.com/>

#### b. Legal Consequences, Remedies, and Termination Rights

While we strive for long-term partnerships, adherence to ethical and legal standards is non-negotiable; therefore, compliance with this Code is a condition of our business relationship. We expect you to comply with this Code and collaborate with us to address potential gaps as set forth in section 5 (a). We also reserve the right to:(i) require immediate corrective action in the event of serious violations, particularly those that pose immediate risks to human rights, worker safety, or the environment; (ii) impose business restrictions, suspend collaboration, or take other remedial measures in response to material breaches or persistent non-compliance; (iii) terminate our business relationship if you repeatedly fail to take corrective action or refuse to collaborate on resolving compliance gaps.

#### 6. Binding Provisions and Acceptance

By signing this document, you confirm that you have read, understood, and agreed to comply with the principles and expectations outlined herein. We reserve the right to review, update, and amend this Code at any time. All updates will be published on our website, which shall serve as the sole channel for communicating changes. It's your responsibility to review the current version periodically.

Your continued relationship with us following the publication of any updates constitutes your acceptance of the revised terms.

#### 7. Signature

Supplier

Name:

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Address:

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Signature:

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Name:

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Title:

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Date:

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