

Frontify Modern Slavery and Human Trafficking Statement for the year 2026

Intro

This Modern Slavery and Human Trafficking Statement for the year 2026 is made pursuant to Section 54 (1) of the UK Modern Slavery Act 2015 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, in Frankfurt, Germany; and TwicPics SAS, located in Paris, France. Together, these entities form the Frontify Group.

The Frontify Group believes that striving to be a responsible business player in today's world and digital arena is an ethical duty. "We're united" is one of our four core principles. Our strength lies in our commitment to each other and our shared purpose. We prioritize inclusivity by seeking diverse voices and remaining open, humble, and resilient to build strong connections and achieve our common goals. To achieve that, the Frontify Group respects and fosters a positive, cohesive, responsible, and flexible working environment as one of the most important aspects of building our company culture. Frontify ensures that the rights of all individuals in the workplace are respected without 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 and to complying with all relevant legal requirements to ensure the due respect for the fundamental rights of individuals. This commitment is grounded in, and informed by, internationally recognized instruments and applicable legislation including but not limited to the Universal Declaration of Human Rights, the ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work, the ILO's eleven fundamental conventions for the protection of labor rights, the UK Modern Slavery Act 2015, title 2 of the Federal Constitution of the Swiss Confederation, the applicable federal and state laws of the US, and any other human rights principles applicable to Frontify as a corporate actor with human rights responsibilities within its industry and supply chain. These efforts reflect Frontify's broader commitment to responsible business conduct and have also led us to pursue B-Corp certification, which we obtained in November 2025.

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 platform that puts knowledge, assets, and guidance in front of the people and tools that need them, enabling brand governance across teams, markets, and channels.

Our policies and processes

Our commitment to respect, protect, and enforce human rights within the Frontify Group and in our daily business lives is crystallized in the five ethical pillars that compose [Frontify for Good](#), 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” expresses our commitment to preventing, refusing, and reporting any risk of forced or involuntary labor and defines our efforts to act ethically and with integrity throughout our daily business.

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 and 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.

We also take a strong stance against child labor and for 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 employment. In the absence of such national regulation, we refer to the relevant guidelines of Convention C138 of the International Labor Organization (ILO). 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 in the St. Gallen hub, which are organized by Frontify AG in our product and our human resources departments.

Regarding flexibility, there are no restrictions on employees for 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 also don’t impose any restrictions or engage in retaliatory behavior in connection with the rights of our employees to join trade unions within the limits of the applicable law of the country in which they’re located and work.

“We embrace ethics and integrity” encompasses three core principles that embody Frontify’s strong commitment to conducting business in a way that leads by example. These three principles include our compliance with the law, 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 toward all our stakeholders. To meet those standards, we, foremost, abide by applicable laws and regulations in force in the countries in which we operate. We also conduct quarterly 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 such as competitiveness, quality, objectivity, correctness, and respectability when engaging with external third parties. We do business exclusively with those external parties that can ensure high standards of compliance, ethics, and integrity, which are substantially equivalent to our own standards; this is an essential precondition to the establishment and continuation of any business relationship. We keep records of all our existing suppliers — including contractors, agency partners, and freelancers — regularly monitor our business relationships, and instruct employees to abide by the internal processes for the engagement of any new supplier. 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 obligation for our suppliers to abide by the Supplier Code of Conduct — among other CSR-relevant documents enforceable throughout our supply chain — and the right to terminate our contractual relationship at any time if we discover any breach of such policies and/or any 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 are encouraged to report any suspected human rights violations in the workplace. Reports can be submitted by emailing legal@frontify.com or through the reporting system available at <https://frontify.personiowhistleblowing.com/>. In addition, the human resources department of Frontify has a dedicated team that serves as a point of contact for employees. The team listens to concerns, fears, questions, and complaints about working conditions, both their own and those affecting others. The team also ensures a secure working environment in which the affected employee is protected against any form of retaliation.

Frontify is committed to engaging with suppliers that reflect our values and respect for human rights and working rights in the workplace. Due to the nature of Frontify as a SaaS company, Frontify's key suppliers consist mainly of (a) tech suppliers, such as data centers that host our platform and our customers' environments and other tech providers that operate a portion of the platform or that assist the Frontify Group in its daily operations; (b) partner agencies that work in the same business domain as Frontify and with whom we establish tight collaborations, including co-marketing activities; and (c) various other suppliers, including freelancers, who are functional for certain company projects (e.g., copywriting or translations) or to operate our facilities (e.g., food and beverage suppliers or cleaning and maintenance services). In principle, Frontify engages only suppliers that are part of our local communities, and when this isn't possible, suppliers that have a proven record of compliance with all local labor standards applicable to their workforce.

All our Corporate Social Responsibility documents, including Frontify for Good, the Supplier Code of Conduct, and our Anti-Corruption and Gift Policy, are available on our website for all suppliers. Our suppliers are located in countries with strong labor law frameworks. As a result, Frontify considers the risk of forced labor and modern slavery within our supply chain to be low. To date, Frontify has not identified any suppliers that could be considered high-risk. However, we recognize that modern slavery risks can arise across all sectors and geographies. Our approach, therefore, focuses on evaluating all suppliers, taking into account factors such as the nature of services provided, geographic exposure, and workforce characteristics.

In 2024, the Board of Directors of Frontify has also approved two core changes in the Articles of Associations, which oblige Frontify to “strive for a material positive impact on the society and the environment,” and the Board of Directors and the officers to take into account “[...] the object of the Company to create a positive material impact [...] as well as the impact of their actions towards the relevant stakeholders.”

While Frontify makes all possible efforts, in line with a company of our size and industry, to prevent any form of slavery, human trafficking, and forced labor in our operations and supply chain — and believes the risk to be minimal — it cannot be entirely excluded.

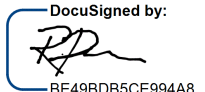
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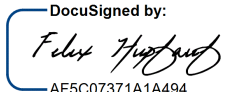
In 2024, we elevated our ESG commitment by developing a comprehensive sustainability strategy and roadmap. A cornerstone of this strategy has been obtaining B Corp certification in winter 2025, which validates our commitment to verified impact across five key areas: governance, workers, community, environment, and customers, and it ensures we create lasting value for all stakeholders. This recognition is also a promise: We'll continue to improve and use our business as a force for good.

In 2026, we're committed to upholding high CSR/ESG standards: We'll continue to monitor our practices, embrace best-in-class approaches, and strengthen our role as a trusted partner for our customers' sustainability strategies. As part of this commitment, we'll strengthen our efforts to prevent slavery and human trafficking across our business and supply chain. We've also introduced an ESG training program for employees to raise awareness of key ESG-related topics and promote responsible business practices across the organization.

The Frontify Modern Slavery and Human Trafficking Statement for the year 2027 shall take into account and be 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 1, 2026, to December 31, 2026.

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Felix Hupfauf  AF5C07371A1A494...

Chief Executive Officer

Chief Financial Officer