

## **Frontify Modern Slavery and Human Trafficking Statement for the year 2025**

### **Intro**

This Modern Slavery and Human Trafficking Statement for the year 2025 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. All together, these entities compose the Frontify Group.

The Frontify Group believes that striving to become a responsible business player in today's world and in the 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 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 in the land of human rights and in the tech industry. Recently, these efforts have led us to pursue the road of the B-Corp certification, which we aim to achieve in 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 DAM for leading brands: the platform unifies guidelines, templates, and assets to transform how marketing teams create on-brand content on a global scale. Frontify empowers companies to scale brand storytelling that resonates deeply with their audiences.

### **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 [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”** 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 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 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). 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 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 pose any restriction or 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 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 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 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 being an essential precondition to the establishment and continuation of any business relationship. We keep records of all our existing contractors, including freelancers, 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 minimum, the right to audit the contractor's compliance with the law and the contractual agreement and the right to terminate our contractual relationship at any time if we discover any breach of relevant national and international human rights principles. Partner agencies, service providers, and freelancers must also abide to Frontify for Good and commit to respecting the principles enshrined in our code of conduct.

### **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), or use the reporting system available at the following link: <https://frontify.personiowhistleblowing.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.

Frontify is committed to engaging with suppliers that reflect our values and our 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 only engages suppliers that are part of our local communities, and when this isn't possible, suppliers that have proof record of compliance with all local labor standards applicable to their workforce.

All our Corporate Social Responsibility documents, including Frontify for Good and our Anti-corruption and Gift Policy, are accessible on our website to all our suppliers. Our suppliers are located in countries that already ensure the respect of labor rights via their national regulatory framework. 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.

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”.

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 in any case not possible.


### Next steps

At the end of 2024, Frontify finalized the preliminary assessment of the B-Corp certification in order to start the audit process, which shall be achieved by the end of 2025. Our policies, internal documents, processes, and training are periodically revised and updated. Thus, in parallel with our efforts to become certified in 2025, the Frontify Group will also, among other initiatives, (a) re-work on Frontify for Good to update it to the evolution of our core values and culture over the past three years, (b) launch a policy on whistleblower protection and a related grievance/complaint mechanism that will complement our existing processes; (c) formalize an internal employee code of business conduct that will provide more granularity to our core values; and (d) establish and deploy a supplier code of conduct addressing our suppliers specifically.

The Frontify Modern Slavery and Human Trafficking Statement for the year 2026 shall take into account and be updated in accordance with the results achieved by the Frontify Group in the current calendar year.

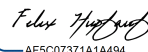
This statement applies to the financial year from January 1, 2025 to December 31, 2025.

Roger Dudler

DocuSigned by:  
  
BE49BDB5CE994A8...

Chief Executive Officer

Felix Hupfauf

DocuSigned by:  
  
AF5C07371A1A494...

Chief Financial Officer