

To whom it may concern

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## **Frequentis Policy Statement on Modern Slavery**

Modern Slavery is a serious crime to be tackled in society and in all businesses. Over the years, Frequentis has established processes across the organisation to ensure that we perform to high standards of Corporate Social Responsibility and that we prevent Modern Slavery in all our supply chains.

The comprehensive measures already implemented since some time include:

- We address the issue of Modern Slavery in our Code of Conduct (CoC) and our Corporate Social Responsibility Code (CSR) for suppliers and subcontractors, and in our contract templates for subcontractors, suppliers, coaches, and employment agencies.
- The Frequentis CSR Code is part of the framework supply agreement with suppliers. The obligation to accept our CSR Code has also been included in the supplier self-disclosure. Thus, at the beginning of the business relationship, the suppliers commit with their signature to apply the Code for themselves as well as for the sub-suppliers.
- In our yearly supplier evaluation, compliance with the CSR Code is a fixed evaluation criterion.
- We frequently train our human resources staff, leadership and staff engaged in Supply Chain Management on the principles of Transparency in Supply Chains, including the strict avoidance of slavery, human trafficking, any other form of forced or compulsory labour, child labour and all kinds of discrimination. Most of this training is done directly on the job.
- Regarding Frequentis staff, we perform a yearly salary review together with our works council to ensure that none of our employees salary is below the minimum salary foreseen in the collective bargaining agreement.
- We focus on compliance with Transparency in Supply Chains when performing Due Diligence reviews with respect to other companies.
- We report on activities relating to Transparency in Supply Chains in our yearly non-financial report.

In the last year, 2022, Frequentis has additionally taken the specific actions mentioned below

- Within the framework of the yearly supplier evaluation, for the first time we presented a dedicated sustainability award for the supplier who achieved the most points in the newly weighted supplier evaluation.

- Despite prolonged pandemic-related restrictions, we were able to carry out nine audits with subcontractors and suppliers, taking into account specific country and/or section risk (virtual audits are not performed because the on-site visit is seen as a decisive and essential criterion for the quality of the audit).
- An open and honest corporate culture, and transparent and respectful communication have always been important to Frequentis. To supplement the existing ways of drawing attention to irregularities and risks or suggesting improvements and to meet the requirements of a new EU Directive, a whistleblower system was implemented in December 2021. No reports were received via this system in 2022.
- We introduced a mandatory e-learning module "Business Ethics and Code of Conduct" to ensure that the principles and values of the Frequentis Code of Conduct continue to be universally recognised and lived throughout the Group in unison with the consistent implementation of the Frequentis growth strategy.

We will keep our Policy on Modern Slavery and our processes to comply with it under annual review.

Peter Skerlan  
Executive Board  
**FREQUENTIS AG**