



# Code of conduct of the FREQUENTIS Group

Policy

# Key note from the Executive Board

The Frequentis Group is a leading provider of information and communication solutions for safety-critical applications with a large number of satisfied customers and partners worldwide.

Our success is due primarily to the commitment, accountability, and the strong, honest work ethic of all employees in all companies of the Frequentis Group.

We are proud of our reputation as a reliable and recognised partner we enjoy with our customers and suppliers, our employees, and in the international community.

To live up to this reputation and to continue the success story of our Group, it is a matter of course for Frequentis that we will continue to conduct our business operations with integrity and on the basis of high ethical principles.

This Code of Conduct of the Frequentis Group describes our key principles and guidelines for responsible and upright business behaviour. We consider the principles expressed herein as vital elements of our corporate culture, characterising a company we can all be proud of.

We thank you for your commitment and support.

Vienna, December 2024



Norbert Haslacher  
Chairman of the  
Executive Board



Monika Haselbacher  
Member of the  
Executive Board



Peter Skerlan  
Member of the  
Executive Board



Karl Wannemacher  
Member of the  
Executive Board

# Principles of conduct

## We comply with applicable laws and internal guidelines

In our business operations we strictly adhere to the internal guidelines, and we comply with the applicable national and international laws, rules, and regulations of each country in which the Frequentis Group operates.

The Frequentis Group does not tolerate any violations of laws.

Every country and each community has its own social and religious norms and cultural practices. The employees of the Frequentis Group respect these practices and comply with local norms in the performance of their duties in the respective countries.

## We value fair and safe working conditions

The Frequentis Group attaches high value on a working environment that is characterised by fairness, trust, mutual respect, and tolerance. We maintain a professional approach and treat each other with integrity and esteem. We appreciate open communication and respect the privacy of each employee and do not tolerate any kind of discrimination.

The Frequentis Group complies with all applicable labour laws and is committed to its responsibilities regarding occupational health and safety. We do not tolerate illegal working conditions and are committed to complying with the standards of the International Labour Organization, ILO. We expect the same from our business partners. Child labour, forced or compulsory labour, slavery, servitude, and human trafficking are strictly prohibited and will not be accepted by the Frequentis Group.

## We are committed to an inclusive organisation that values and respects diversity

As an international group of companies, Frequentis values diversity and aims to create an inclusive, engaged, and values-driven workplace. We believe that equitable opportunities are the key to success. We strive to build and foster a workforce that reflects the richness of our communities.

We understand that a variety of backgrounds, experiences, and perspectives – including skills, education, work style, religion, and more – fuels creative problem-solving and leads to better decision-making.

We recognise and respect the personality and the unique capabilities of each individual. As an international group of companies, we welcome and appreciate the diversity of our employees. The Frequentis Group does not tolerate any type of discrimination in any form whatsoever, especially based on gender, age, or sexual orientation, origin, ethnicity, or religion. We offer all employees equal employment opportunities. Basis for all personnel decisions are suitability, performance, qualification, integrity, and similar impartial criteria, whether in recruitment, training, remuneration, or promotion.

We foster a collaborative and respectful workplace where everyone feels valued. We expect open communication and a willingness to learn from colleagues. Discrimination, harassment, and bullying have no place at Frequentis and will not be tolerated. We encourage everyone to speak up if they witness or experience such behaviour.

## **We act with integrity towards customers and suppliers**

We strive to be a reliable partner for our customers and suppliers and establish long-term business relations, which are characterised by transparency, fairness, and integrity.

The selection of our suppliers is based on objective criteria.

Customers or suppliers who are also our competitors are treated fairly and are not disadvantaged.

## **We are committed to open and fair competition**

The Frequentis Group is committed to the principle of open and fair competition. We achieve our market success through entrepreneurship, innovation strength, and customer orientation, through the quality and attractiveness of our products and services, and, not least, thanks to the commitment and the sense of responsibility of our employees.

Limitations of free competition and infringement of competition and antitrust regulations are incompatible with the corporate culture and the business principles of the Frequentis Group.

We do not engage in activities which restrict fair and open competition, or which constitute violations of competition or antitrust laws:

- We do not make agreements that restrict competition – whether in written or oral form, or by conclusive conduct.
- The Frequentis Group holds a very strong position in certain markets. We do not abuse our dominant position in the market.
- In the communication with our competitors, we do not exchange confidential information that could be used to interfere with free competition.
- We respect the business and company secrets of our competitors, and we obtain market information in a lawful manner only.

## We are opposed to all forms of corruption

Dealings of the Frequentis Group with business partners, customers, and suppliers are guided by the principles of openness, fairness, and transparency. We reject all forms of active or passive corruption, and we avoid any conduct that influences business transactions in an improper way or that could create the appearance of such influence.

We strictly adhere to national and international anti-corruption laws, and we observe the guidelines and policies of our business partners, which we have been made aware of.

Employees of the Frequentis Group do not, directly nor indirectly, offer, promise, give, demand, or accept bribes or any other unjustified advantages to exert any undue influence on decisions of our business partners or authorities.

Occasional gifts, appropriate hospitality, and other benefits of minor value that conform to customary business practice are permissible in compliance with the applicable laws. However, it is never permitted to offer or to give, to demand or to accept any gift of money.

## We avoid conflicts of interest and promote transparency

We base our decisions on the principles of transparency and objectivity. In the performance of our tasks, we always act in the interests of the Frequentis Group and ensure strict separation between corporate and private interests.

However, situations may arise in which our personal interests come into conflict with those of the Frequentis Group, and in which professional judgement is influenced by private interests.

In such events, we seek for transparency, and we proactively report potential conflicts of interests to our supervisor or to another manager of the Frequentis Group.

Conflicts of interest may arise, for example, in the following situations:

- Secondary employment or side-line jobs which can affect our work for the Frequentis Group. This also includes the engagement as a managing director and the participation in supervisory or advisory boards of a company outside the Frequentis Group.
- Direct or indirect (through family members or other related persons) investments in business partners or competitors of the Frequentis Group. This does, however, not extend to minor investments in listed companies in the course of normal investment strategies.
- Business transactions with business partners whose representatives are family members or other related persons.
- Supervisor function towards a family member or another related person.

## We protect the property of the Frequentis Group and respect the rights of third parties

The resources and technical equipment made available by the Frequentis Group are provided for business use only. Any use for private purposes – in general or on a case by case basis – is allowed in the expressly permitted scope. We treat company resources with care and diligence as if they were our own property.

We are aware that intellectual property, including business and trade secrets, know-how, and industrial property rights, is of particular importance for the sustained success of the Frequentis Group. Non-disclosure and the protection of intellectual property have the highest priority for employees of the Frequentis Group. We take all necessary measures to protect electronic and non-electronic data from internal and external misuse. We proactively defend the rights of the Frequentis Group whenever these rights are threatened or violated.

We respect the (intellectual) property rights and trade secrets of third parties. We acquire information about our competitors by fair and lawful means only. We make sure that we do not violate the rights of third parties in our business operations, and we use a third party's (intellectual) property only in accordance with the rights granted to us by the third party. If we are entrusted with the property of others, we protect it with the same care as our own.

## We maintain a responsible approach to AI

Both in the use of AI (artificial intelligence) supported software and in the development of AI supported solutions, we align ourselves with the constantly changing national and international framework conditions, especially in data protection and cyber security. We use AI in a responsible, fair, transparent and non-discriminatory manner and place the well-being and privacy of our employees and business partners at the centre of our activities. Human behaviour and human supervision always take priority when using AI.

## We communicate responsibly

Media contacts, press information, and public statements on the Frequentis Group are reserved for the Executive Board of Frequentis AG and for persons explicitly authorised, in general or on an individual case basis.

In our communications, we pay attention to a professional, objective, and respectful tone. We avoid – even jocular – wordings which contradict our principles of conduct or which could give the impression of non-compliance with the principles of this Code of Conduct.

Neither in private life nor in social media we divulge internal or confidential information or make statements that could harm the company. This includes statements which are derogatory, or which are capable of impairing the reputation of the Frequentis Group or its employees.

We ensure that the collection, storage, and transmission of personal data are done in a legal manner and for legal purposes only, and that the confidential interests of the persons concerned are preserved.

## We are committed to sustainability and to responsibility to society

In the conduct of our business, we consider it important to prevent adverse effects on the environment and society. Compliance with social standards and the sensible use of resources and energy have a high priority for us.

We foster a constant dialogue with all stakeholders and are committed to the welfare of our social environment.

# Our principles of conduct

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applicable laws  
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to an inclusive  
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We act with  
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customers and  
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We are committed  
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We are opposed  
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We avoid conflicts  
of interest  
and promote  
transparency

We protect the  
property of the  
Frequentis Group  
and respect the  
rights of third  
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We maintain  
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approach to AI

We communicate  
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We are committed  
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The logo for Frequentis, featuring the word "FREQUENTIS" in a bold, blue, sans-serif font. The letters are composed of horizontal bars of varying lengths, creating a stylized, modern look.

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