

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 our Group companies and 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-assessment. 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.
- We focus on compliance with Transparency in Supply Chains when performing Due Diligence reviews with respect to other companies.
- 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.
- Additionally, every two years, a mandatory income report is prepared in accordance with Section 11a of the Austrian Equal Treatment Act (GIBG). This report contains information on the number of men and women in each salary grade and the number of years in the salary grade, along with corresponding average salaries of men and women in the calendar year.
- We report on activities relating to social and employee matters as well as to supply chain management in our yearly non-financial report (from 2024 on, in our integrated sustainability report).

In the last year, 2024, Frequentis has additionally taken the specific actions mentioned below:

- Regarding the Frequentis supply chain, assessments were performed for the suppliers that account for the highest order volume (top 10%) and for those that play a key role in the supply of specific groups of products. As planned, the assessment for 2024 is performed in Q1 2025.
- The 2023 assessment, which was performed in Q1 2024, covered 101 suppliers accounting for a procurement volume of EUR 48.1 million at Frequentis AG. The top three suppliers received performance awards and certificates. A package of measures was agreed and implemented with suppliers whose performance needed to be improved.
- Furthermore, Frequentis carried out eight on-site audits with subcontractors and suppliers, taking into account specific country and/or section risk.
- In addition to the mandatory Compliance training course for all employees, an e-learning tool regarding Compliance was implemented in May 2024, mandatory for all employees with customer contact (e.g procurement, project management). Also the Executive Board completed this training.
- To foster an open and honest corporate culture, and transparent and respectful communication, a whistleblower system is in place to supplement the existing ways of drawing attention to irregularities and risks or suggesting improvements since December 2021. Further details are to be found in the consolidated nonfinancial statement 2024.
- The Frequentis Group does not tolerate any form of discrimination, particularly on the basis of gender, age or sexual orientation, origin, ethnicity or religion. These guidelines of behaviour are put down in the Frequentis Code of Conduct. In 2024, to reinforce awareness of this important aspect, a paragraph dealing with diversity was added. Furthermore, also a statement regarding the Frequentis responsible approach to AI (artificial intelligence) was included.
- To learn more about the particular aspects of working at Frequentis and our staff values, a broadly based employee survey was conducted at Frequentis headquarters in Vienna. The survey reflected a high level of satisfaction and provided constructive feedback, which will be discussed and used to derive measures. Another important factor for the internal social dialogue is the ongoing exchange with the Frequentis works council.
- Various awards and recognitions underline Frequentis' efforts to tackle modern slavery and to underline our position as an attractive employer. E.g., in 2024, Frequentis once again received the "Top Company" award from kununu (an employer rating platform, broadly known in the European German-speaking countries). In the US, Frequentis USA was named a Top Workplace by the Baltimore Sun Media.
- Following the EU directive on sustainability reporting, CSRD (Corporate Sustainability Reporting Directive), Frequentis is providing extended sustainability reporting from the 2024 reporting year. The ESRS Standards S1 and S2 as well as G1 cover all work-related social aspects and will thus receive additional increased attention.

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



Peter Škerlan
Executive Board
FREQUENTIS AG