

To whom it may concern

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Vienna, February 2024

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-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.
- 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.

In the last year, 2023, Frequentis has additionally taken the specific actions mentioned below

- Regarding the Frequentis supply chain, the suppliers with the highest order volume (top 10%) are evaluated on the one hand, and those suppliers that have a key position in certain product groups on the other.
- In 2023, 90 suppliers with a purchasing volume of EUR 46.5 million for Frequentis AG were assessed for 2022. The best suppliers (top 3) were honoured and received prizes and certificates in recognition of their performance. A package of measures was agreed and implemented with suppliers whose performance needed to be improved. [The evaluation for 2023 will be carried out in Q1 2024].
- Frequently carried out seven on-site audits with subcontractors and suppliers, taking into account specific country and/or section risk.
- A “Compliance for Sales” training is a mandatory part of the Frequentis Sales Excellence programme for all sales employees. At the end of 2023, 66% of sales employees had completed this training. Furthermore, in 2023, the decision was taken by the Board to implement an e-learning tool in 2024 which will be mandatory for larger parts of the Frequentis staff.
- An open and honest corporate culture, and transparent and respectful communication have always been important to Frequentis. Since December 2021, a whistleblower system is in place to supplement the existing ways of drawing attention to irregularities and risks or suggesting improvements. Further details are to be found in the Nonfinancial Report 2023.
- The Frequentis Group does not tolerate any form of discrimination, particularly on the basis of gender, age or sexual orientation, origin, ethnicity or religion. To reinforce awareness of this issue, a video message from the Executive Board was published in 2023. In addition, an "Equal treatment and anti-discrimination" training programme was developed for the Frequentis companies in Austria and Germany.
- Various awards and recognitions underline Frequentis' efforts to tackle modern slavery. In 2023, Frequentis received the equalitA seal of approval by the Federal Ministry of Labour and Economic Affairs, an award for the promotion of women within the company. Furthermore, Frequentis signed the “Charta of Diversity” (an initiative of the Austrian Chamber of Commerce WKO) as a commitment to all dimensions of diversity.
- Following the new EU directive on sustainability reporting, CSRD (Corporate Sustainability Reporting Directive), Frequentis is obliged to provide extended sustainability reporting from the 2024 reporting year. As a first step and basis to fulfil the requirements of the ESRS standards, a materiality assessment was conducted in October 2023. The ESRS Standards S1 and S2 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 Skerlan
Executive Board
FREQUENTIS AG