

# Infinigate Group Whistle Blowing policy

Infinigate Group  
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**Approved by**      Richard Huth – EVP Integration and Compliance

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# 1 Introduction

As a Value-Added Distributor we aim to deliver long-term value to our stakeholders, build on mutual respect and trust. We therefore encourage all our stakeholders to report any form of illegal, unethical, and fraudulent activity which may occur in our organization.

This Policy was developed in compliance with the relevant legal requirements and current best practices relating to the protection of whistleblowers in accordance with the EU directive of the Europe Parliament of 2019.

## 1.1 Purpose of this Policy

The purpose of this policy is to set the framework for the whistleblowing platform of Infinigate which can be used to report any perceived or actual fraudulent conduct, improper ethical behaviour or other wrongdoing within the company.

With this policy, we hope to detect and investigate any unethical behaviour in a timely manner as well as to encourage and protect employees who speak up when they encounter behaviour in the workplace that is unethical, illegal or goes against the values of Infinigate's Code of Conduct.

## 1.2 Who can submit a report?

The whistleblower platform of Infinigate can be used by all employees of Infinigate (both permanent and temporary), Infinigate's vendors and customers and any other third party in a business transaction with Infinigate and its subsidiaries.

## 1.3 How is a report submitted?

A whistleblower concern can be made using the Infinigate whistleblower platform which can be accessed through the company's website: [whistleblowersoftware.com/secure/infinigate](https://whistleblowersoftware.com/secure/infinigate).

We urge all whistleblowers to include as much information as possible in their reports to ensure a proper investigation. This information includes but is not limited to date, time, location as well as names and roles of people involved if necessary.

## 1.4 What is reportable conduct?

The Infinigate whistleblower platform can be used to report any form of unethical behaviour in relation to the company which includes but is not limited to:

- Human and labour rights abuses
- Corrupt, dishonest, and fraudulent dealings including bribery
- Violence, theft, and other illegal activities
- Health and safety issues
- Harassment and discrimination based on gender, sex, and religion.
- Fraudulent behaviour which is in violation of the policies set by Infinigate (for example the Code of Conduct)

Reportable conduct does not include

- complaints for which specific procedures have been established, such as labour law matters or personal grievances of employees (which should be reported to your next-level supervisor or your human resource department); and
- complaints by other stakeholders about quality of service or scope of information provided in relation to products and services offered.

## 1.5 Investigation process

All reports submitted will be evaluated by the whistleblower committee.

After the report has been received, the whistleblower will receive a confirmation of receipt latest 7 days after the receipt of the report. The report will be reviewed and investigated by the whistleblower committee. The extend of the investigation will depend on the magnitude of the concern raised. If the investigation shows that the concern does not fall under the whistleblowing scheme of Infinigate, the case will be closed, and the whistleblower will be informed accordingly.

In case of further questions, a member of the whistleblower committee will contact the whistleblower. If additional information is not provided within 10 days after contact, a decision will be made with the information available to the whistleblower committee.

After the investigation is over, the whistleblower will be notified of the result of the investigation through the whistleblower platform. The whistleblower will receive feedback with 3 months of the confirmation of receipt or within 6 months in special cases.

The whistleblower committee will ensure that all reports undergo a fair process irrespective of the person(s) involved.

## 1.6 Confidentiality and protection for whistleblowers

A whistleblower concern can be reported either confidentially or anonymously.

- Confidential whistleblowing: Here the name of the whistleblower will be known by the whistleblower committee but will not be disclosed without their consent, unless required by national law.
- Anonymous whistleblowing: Here the identity of whistleblower will be unknown to everyone. In this case, we advise the whistleblower to provide enough information to facilitate a thorough investigation.

All whistleblower reports will be handled with the utmost discretion and confidentiality and will only be shared with the members of the whistleblower committee. The identity of the whistleblower will be kept confidential through the investigation process as a precautionary measure to prevent any form of retaliation against the whistleblower. If a report was turned in anonymously, it is technically ensured that no one at Infinigate is able to receive any personal information, not even the used email address, of the whistleblower.

A whistleblower or stakeholder who contributes to the investigation of a report shall not be submitted to any form of retaliation or any other negative consequences. Employees who retaliate against whistleblowers will be subjected to a disciplinary action which could lead to dismissal.

Individuals who believe they are being subjected to any form of retaliation because of reporting a violation should immediately report the retaliation through the whistleblower platform or their next level supervisor.

Any questions or inquiries regarding this policy or the whistle blowing platform can be directed to our Compliance Officer.

### Contact Details

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## 2 Definitions

**We:** Infinigate.

**Stakeholders:** All individuals affected by the business operation of Infinigate.

**Employees:** Full-time, part-time and other workers of Infinigate.

**Whistleblowing:** When an individual raises a concern or issue about any misconduct or malpractices within an organization.

**Whistleblower:** A whistleblowers is an individual who reports, via the appropriate channels Reportable Conduct or other malpractices. A whistleblower can be a previous and current employee, Vendor, Customers or any other stakeholders of in a business relation with the company.

**Report:** Any complaint or concern of a compliance matter made under this policy.

**Good faith:** This means with honest intent and without malicious intentions. It means that the platform may not be used to raise any concerns containing information that the whistleblower knows is wrong.

**Whistleblower committee:** An ethics management committee responsible for:

- Receiving whistleblowing reports
- Investigating whistleblowing reports
- Deciding on the outcome of the investigation
- Reporting on the outcome of the investigation to the Group CEO and Board
- Ensuring protection of whistleblowers

**Retaliation:** Any negative action taken against any person who in good faith reports a misconduct, makes a whistleblower report or assist in a whistleblower investigation. Such actions could be but are not limited to:

- Dismissal, suspension or equivalent measures
- Harassment, intimidation, or bullying
- Discrimination, disadvantageous or unfair treatment
- Negative performance assessment or employment reference

**Protection of a whistleblower.** This includes:

- Identity protection
- Protection of whistleblower from all forms of retaliation