



## IGL-POL-ESG- Environment, Social & Governance Policy V3.0

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IGL-POL-ESG-Environment, Social & Governance Policy V3.0



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# 1. Introduction

Infinigate is the leading technology platform and trusted advisor in cybersecurity, cloud, and network infrastructure. Headquartered in Switzerland, Infinigate has over 1,500 employees across Europe, the Middle East, and Australia and New Zealand. Infinigate has built a reputation for delivering deep technical expertise and locally tailored services while maintaining a robust central supply chain.

Infinigate's supply chain is built on strong partnerships with leading technology vendors in cybersecurity, cloud, and network infrastructure. With a network of 35,000 partners, including Cloud Service Providers, Managed Service Providers, and Managed Security Service Providers, the company plays a critical role in enabling businesses to adopt secure digital solutions.

Infinigate recognises that the responsibility of a company towards its stakeholders, as well as the environment, begins with our core principles and how we conduct our business. As we grow so does our ESG agenda and over the past year we have continued to mature by embedding ESG into our governance.

This policy describes the Environmental, Social and Governance (ESG) framework that informs the standard for our operations and how we interact with our stakeholders, outlines our current state of ESG practices and our commitments for continuous development in the year ahead.

## 1.1 Infinigate's ESG Framework

ESG must be at the core of Infinigate's mission to be the leading technology platform and trusted advisor in Cybersecurity, Cloud & Network Infrastructure. Infinigate recognises that responsible corporate behaviour not only mitigates risks but also strengthens the long-term resilience of our operations and that of our partners, customers and the communities we operate within. Infinigate are on the journey of taking its ESG agenda beyond compliance, delivering positive value and impact to stakeholders across our business and extended value chain.

With reference to the image below, the Ten Principles of the UN Global Compact (UNGC) serve as the foundation of the Infinigate ESG framework. The United Nations Global Compact is an international strategic policy initiative that prompts organisations around the world to operate in a manner that meets the fundamental needs for human rights, labour, environment, and anti-corruption. By implementing the Ten Principles of the UNGC, we not only strive to comply with the responsibilities towards our employees, the protection of our planet and our community, but also create the foundation for our long-term success.

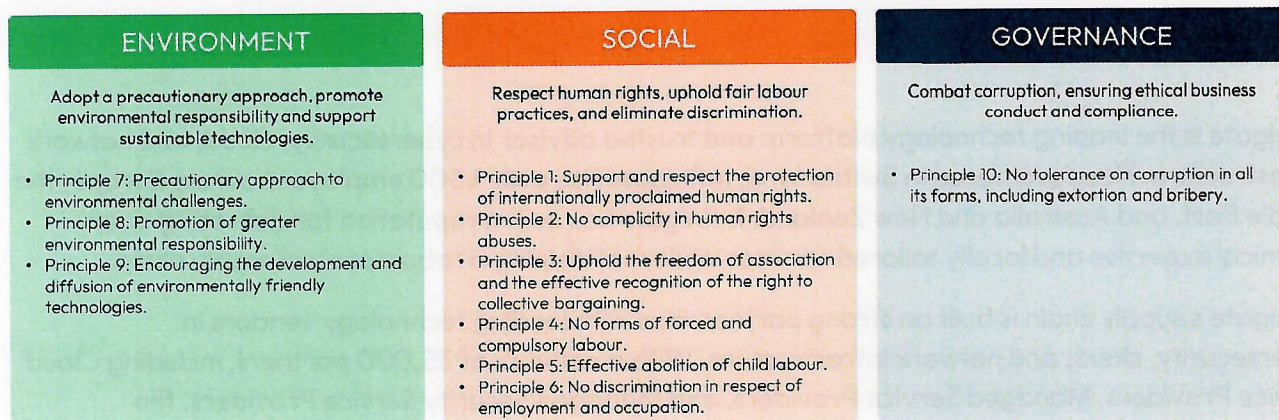


Figure 1 - the Infinigate ESG framework.

## 1.2 Scope

This ESG policy applies across all Infinigate operations and subsidiaries. This policy provides a framework for integrating ESG considerations into our corporate strategy, risk management, and daily operations. It is subject to annual reviews and updates to ensure alignment with emerging ESG trends, stakeholder expectations and regulatory requirements. This policy serves as a reference document to specific environmental, social and/or governance policies where they have been formalised.

## 2. Our Commitments

Infinigate is dedicated to embedding ESG principles into our business, ensuring our operations contribute positively to the environment, society and corporate governance. Our commitments reflect our ambition to drive meaningful change and sustainable growth through continuous improvement.

In the financial year 2025-2026, we commit to:

- **Environment:**
  - **GHG Baseline** – Define our group-wide GHG footprint baseline.
  - **GHG Reduction Target and Plan** – Develop a GHG reduction plan with science-based targets and commitment dates.
  - **Supply Chain Engagement** – Begin to engage with our material partners and suppliers to understand their sustainable practices and to encourage adoption of practices that align with our environmental standards.
- **Social:**
  - **Strategic Human Resource Management** – Collaborate across our regions to define and align our approach to human capital management to ensure consistent, transparent and ongoing support for our workforce.
  - **Human Capital Reporting and Analysis** – Analyse our workforce data to evaluate and report on the recruitment and management of a global, diverse and skilled workforce, using this data to track and measure key human capital metrics.
  - **Ongoing Inclusive Culture Initiatives** – Continue to publish and promote initiatives that foster an inclusive, engaged, and equitable workplace, ensuring visibility and transparency for all stakeholders.
- **Governance:**
  - **Double Materiality Assessment** – Conduct a double-materiality assessment to improve integrity of the Infinigate ESG framework.
  - **ESG Strategy and Roadmap** – Develop the Infinigate ESG Strategy and Roadmap to define priorities and drive continuous improvement and measurable progress across environment, social and governance.
  - **ESG Reporting Framework** – Define a comprehensive ESG reporting strategy based on best practice frameworks to strengthen transparency and accountability of ESG disclosures.

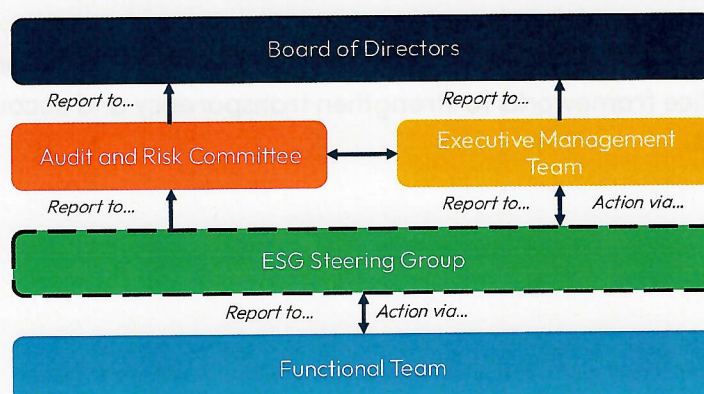
## 3. Governance

Effective governance is fundamental to Infinigate's commitment to ESG and to combat corruption, ensuring ethical business conduct and compliance. The ESG function is led by the General Counsel, Nina Gherzi, and ESG Manager, Tristram Broady.

### 3.1 Structure, Roles and Responsibilities

The ESG governance structure at Infinigate is presented below, within which the roles and responsibilities are outlined as follows. This structure ensures full accountability for ethical business conduct and compliance, as well as enabling the strategic and practical delivery of Infinigate's ESG agenda.

- **Board of Directors** – Provides strategic oversight and ensures ESG is integrated into Infinigate's overall vision and long-term objectives. The Board reviews ESG performance, approves major initiatives and group policies, and ensures alignment with corporate goals.
- **Executive Management Team** – Responsible for embedding ESG into business operations, driving strategy implementation, and monitoring progress. They ensure ESG considerations are factored into key decision-making processes.
- **Risk and Audit Committee** – Oversees risk management related to ESG, ensuring compliance with regulatory requirements and corporate policies. The committee evaluates ESG risks, monitors mitigation strategies, and ensures transparency in ESG reporting.
- **ESG Steering Group** – A cross-functional team that drives ESG initiatives, sets priorities, and tracks progress against ESG objectives. The group facilitates collaboration between different departments to integrate across business.
- **Functional Teams** – Each department plays a role in implementing ESG initiatives relating to their area, such as sustainable procurement, human resources diversity programs, and IT security enhancements. These teams ensure ESG policies are delivered at an operational level.



## 3.2 Compliance

Infinigate adheres to all applicable ESG-related laws and regulations ensuring full compliance across our operations, as a minimum. Overall compliance is monitored by the Audit and Risk Committee biannually and we conduct audits and assessments to monitor ESG performance and mitigate risks proactively.

Beyond compliance with external laws and regulation, we expect that our employees and our suppliers and partners will comply to the Infinigate standards of conduct and ethics. We have detailed Infinigate's Code of Conduct and Ethics for both employees and suppliers which sets out the fundamental principles, standards and conduct that ensures clear commitment to ESG, and the stakeholders who interact with us. We deliver a compliance programme which rolls out training in subjects such as the Code of Conduct, Anti-Bribery & Corruption, Modern Slavery, amongst others, to ensure we nurture a culture of continuous learning and excellence.

The Code of Conduct and Ethics details the commitments regarding:

- Anti-Bribery and Corruption
- Anti-Money Laundering
- Conflict of Interest
- Export Controls
- Fair Competition
- Public Officials
- Confidentiality
- Safeguarding of Property, Information and Assets
- Anti-Harassment and Intimidation
- Diversity and Equal Opportunities
- Human Rights
- Labour rights
- Protecting the Environment
- Sponsoring and Donations.

### 3.3 Performance and Reporting

Infinigate is committed to measuring and transparently reporting on our ESG performance to ensure accountability and continuous improvement. We recognise that non-financial performance indicators are essential in assessing our impact on the environment, society, and governance practices. We currently provide ESG-related reporting on request to support the performance monitoring of our investor and key partners.

Moving forward, Infinigate commit to:

- **Double Materiality Assessment** – Conduct a double-materiality assessment to improve integrity of the Infinigate ESG framework.
- **ESG Strategy and Roadmap** – Develop the Infinigate ESG Strategy and Roadmap to define priorities and drive continuous improvement and measurable progress across environment, social and governance.
- **ESG Reporting Framework** – Define a comprehensive ESG reporting strategy based on best practice frameworks to strengthen transparency and accountability of ESG disclosures.

## 4.Environment

Infinigate is committed to reducing, directly and indirectly, any negative influences our organisation might have on the environment. We shall adhere to relevant international and local laws and standards, strive to minimise our environmental impact and take a sustainable approach in our day-to-day operations. We are committed to supporting our customers and the industry to be better environmental performers through our products and services.

At a Group-level, we currently have in place:

- **Group Green Energy Policy** – policy outlining our commitment to transition towards more renewable alternatives of energy for Infinigate’s premises to reduce our greenhouse gas emissions.
- **Group Car Policy** – policy outlining our commitment to reduce the greenhouse gas emissions of our business travel.
- **WEEE Schemes** – Infinigate operate in partnership with waste from electrical and electrical equipment (WEEE) schemes to ensure compliance with registration, reporting and recycling obligations.

Moving forward, Infinigate commit to:

- **GHG Baseline** – Define our group-wide GHG footprint baseline.
- **GHG Reduction Target and Plan** – Develop a GHG reduction plan with science-based targets and commitment dates.
- **Supply Chain Engagement** – Begin to engage with our material partners and suppliers to understand their sustainable practices and to encourage adoption of practices that align with our environmental standards.

## 5. Social

We recognise and understand the importance of protecting our employees whether temporary, part-time or full-time as well as promoting equality and fairness. We will not tolerate any form of discrimination, and we value all employees despite their ethnicity, age, religion, gender or sexual orientation. We are committed to ensuring that our work environment is one where all our employees feel safe and can fully develop their talents.

At a Group-level, we currently have in place:

- **Health and Safety Statement** – statement outlining the responsibilities for health and safety at a group and local management level.
- **Modern Slavery and Human Trafficking Statement** – statement outlining Infinigate's zero-tolerance approach to modern slavery and human trafficking.
- **Code of Conduct and Ethics/ Supplier Code of Conduct** – code which details the set ethical standards Infinigate's employees, contractors and suppliers must comply with.
- **Whilst Blowing Policy and Platform** – framework for the whistleblowing platform of Infinigate which can be used by employees and 3<sup>rd</sup> parties to report any perceived or actual fraudulent conduct, improper ethical behaviour or other wrongdoing within the company.
- **Training** – annual training for employees on the policies and procedures which ensure our work environment is one where all our employees feel safe.

Moving forward, Infinigate commit to:

- **Strategic Human Resource Management** – Collaborate across our regions to define and align our approach to human capital management to ensure consistent, transparent and ongoing support for our workforce.
- **Human Capital Reporting and Analysis** – Analyse our workforce data to evaluate and report on the recruitment and management of a global, diverse and skilled workforce, using this data to track and measure key human capital metrics.
- **Ongoing Inclusive Culture Initiatives** – Continue to publish and promote initiatives that foster an inclusive, engaged, and equitable workplace, ensuring visibility and transparency for all stakeholders.

## 6. Relevant Policies

Infinigate's ESG approach is supported by a suite of internal and external policies. These policies provide further clarity and accountability of how we embed our ESG principles into our operations, culture and decision-making.

The following policies are particularly relevant to the implementation of our ESG ambitions:

- [Infinigate's Code of Conduct and Ethics](#) – Outlines expectations regarding ethical behaviour, integrity, anti-corruption, and professional standards for all employees.
- [Supplier Code of Conduct](#) – Sets out ESG expectations for our supply chain partners, including compliance with human rights, labour laws, environmental sustainability and anti-corruption standards.
- [Health and Safety Statement](#) – Promotes a safe, healthy, and supportive work environment for all employees.
- [Group Modern Slavery Statement](#) – Demonstrates commitment to identifying, preventing and addressing modern slavery and human trafficking risks across our business and supply chain.
- [Whilst Blowing Policy and Platform](#) – Provides a mechanism for reporting unethical behaviour, including ESG-related issues, in a secure and confidential manner.

## 6. Relevant Policies

Integrity's ESG approach is supported by a suite of internal and external policies. These policies provide further clarity and accountability of how we embed our ESG principles into our operations, culture and decision-making.

The following policies are particularly relevant to the implementation of our ESG ambitions:

- **Integrity's Code of Conduct and Ethics** – Outlines expectations regarding ethical behaviour, integrity, anti-corruption, and professional standards for all employees.
- **Supplier Code of Conduct** – Sets out ESG expectations for our supply chain partners, including compliance with human rights, labour laws, environmental sustainability and anti-corruption standards.
- **Health and Safety Policy** – Promotes a safe, healthy, and supportive work environment for all employees.
- **Gender Equality Statement** – Demonstrates commitment to identifying, preventing and addressing modern slavery and human trafficking risks across our business and supply chain.
- **Whistleblowing Policy** – Provides a mechanism for reporting unethical behaviour, including ESG-related issues, in a secure and confidential manner.