



Group Code of Conduct and Ethics

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Our Commitment to Ethics and Compliance

Ethical behaviour involves more than just observing the law. Our Code of Ethics and Conduct (the “Code”) sets out the fundamental principles, standards and conduct that enable us to successfully pursue our mission, accomplish our goals and promote our values. Our Code outlines the basic legal and ethical standards that must consistently guide our actions and decisions and provides practical advice on how to conduct ourselves. It also identifies the key components of our compliance programs and explains where to find the appropriate support and guidance.

We should always strive to exercise fair judgment, show care and consideration in our service for Infinigate. If there are differences between applicable laws and regulations, and the standards set out in this Code, the highest standard consistent with applicable local laws should be applied. Violation of this Code or applicable laws may lead to internal disciplinary actions, dismissal or even criminal prosecution.

If you have questions regarding the content of this Code or the interpretation thereof, please contact compliance@infinigate.com. If you require advice in the handling of a specific ethical dilemma, you should consult with your local manager or other appropriate authority. You are also required to report any evidence of violations of this Code or applicable laws either directly to your superior, contacting compliance@infinigate.com, or using our Whistleblower hotline, which is accessible via local and Group websites. Reporting violations will never result in disciplinary action.

A message from our CEO

As an IT Channel leader across EMEA and ANZ, Infinigate has a responsibility to conduct itself according to the highest industry and moral standards. This responsibility is shared across each and every member of the Infinigate team. Each employee, through his/her behaviour is an ambassador of our integrity, in the way we conduct ourselves, interact and conduct business.

We understand and apply our values: 'Own it!', 'Aim High!' and 'Be Open!' to our everyday work and continue to build the reputation of high performance and trustworthiness that Infinigate has earned over the past 30 years.

We take pride in our ethical behaviour and the Infinigate Code of Conduct and Ethics is our point of reference to ensure we act according to the highest standards and comply with the industry's requirements in this area.

I ask you to ensure you are familiar with our Code of Conduct and Ethics, as an essential guide to how we conduct business at Infinigate.

You can report any infringement of our Code of Conduct and Ethics through our whistleblower channel. How we achieve our goals is as important as achieving them – let's continue to generate the trust that allows us to be an important reference in our industry, accelerating towards a secure digital future, together.

Marco van Kalleveen

Infinigate Group CEO

1.1 Why we need a Code of Ethics and Conduct

Establishing a standard set of behavioural guidelines is important for any community or business, especially where our success is the result of the performance of each employee. Knowing what behaviour is acceptable and encouraged creates a clear picture of our desired conduct in our path to be a successful and respected business. Furthermore, it ensures we create a positive outcome for Infinigate, its partners, customers and the wider community. This Code of Ethics and Conduct (the “Code”) establishes the necessary behaviours for all our employees.

1.2 Who does it apply to?

This Code applies to all Infinigate employees around the world, including officers and the Board of Directors. All are required to follow the Code. It is our goal that everyone working with or for Infinigate should value and demonstrate their commitment to integrity, honesty and fairness every single day.

1.3 How do you report violations?

We urge all employees to immediately report any cases of Code violations. If you witness a Code violation (or any other Company policy violation) or want to report a potential conflict of interest, contact your supervisor immediately or any Infinigate manager. You can also contact the General Counsel via compliance@infinigate.com.

If you prefer not to notify any of those identified above, you are urged to report the matter through the Infinigate whistleblowing channel:

- [Infinigate Whistleblower System | Home](#).

Infinigate will ensure that there will be neither any retaliation nor any impact for reporting any possible violations in good faith.

1.4 Personal Responsibility

At Infinigate, we strive to exercise good judgment, care and consideration in our business and for our colleagues. We familiarize ourselves with the rules and regulations and perform our duties in line with the principles shared in our Code.

Furthermore, our managers are urged to communicate the requirements of the Code to all their direct team members. Our managers are also responsible for promoting and monitoring compliance with the Code within their respective areas of responsibility.

1.5 Board of Directors and CEO's Responsibility

Infinigate's Board of Directors is responsible for safeguarding, implementing and overseeing the management of this Code. Additionally, the Board performs formal policy reviews.

The CEO of Infinigate ensures that employees are aware of and comply with this Code. The CEO also ensures that annual Code training is conducted for all employees groupwide, and that they confirm they have read and understood the Code.

2. Our Purpose, Mission, Vision and Values

Our Purpose, Mission, Vision and Values are central to how we conduct ourselves. All employees should be familiar with our Purpose, Mission and Vision, and should embody our values – as highlighted below.



2.1 Our Core Values

2.1.1 Own it!

At Infinigate we take ownership and responsibility for generating growth and creating positive outcomes for employees, vendors and partners.

2.1.2 Aim High!

At Infinigate we are ambitious. We constantly challenge the status quo to improve and set new standards of excellence, turning challenges into opportunities and ideas into creative solutions.

2.1.3 Be Open!

At Infinigate we are open-minded. We don't just manage change, we drive it through innovation. With our willingness to learn we anticipate and are ready to face the challenges of today and tomorrow.

3 Codes of Conduct and Ethics

3.1 Anti-Bribery and Corruption

Corruption is the misuse of entrusted power—whether by a senior official or any employee—for personal benefit.

Bribery occurs when an individual offers, provides, requests, or accepts an improper payment, gift, or advantage to influence a business or governmental decision or outcome. A bribe may involve money, gifts, donations, travel or employment benefits, or any other item or service of value.

A specific type of bribery, known as a “facilitation payment”, refers to unofficial payments made to expedite or secure routine services or entitlements. Under several anti-bribery laws applicable to Infinigate, facilitation payments are illegal and are treated as bribes. Therefore, it is strictly forbidden for anyone representing Infinigate to offer, make, or authorize such payments.

Infinigate strictly prohibits all forms of corruption and bribery, whether direct or indirect, whether involving public officials¹ or private individuals. This applies equally to employees, contractors, business partners, and any third party acting on Infinigate’s behalf.

Employees must:

- Refuse to make or accept improper payment, even if this may result in the loss of business or a delay in operations. Engaging in, or ignoring signs of, bribery or corruption can lead to serious legal consequences for both Infinigate and the individuals involved. No employee or business partner will face negative consequences as a result of refusing improper payment.
- Ensure all payments are legitimate, properly authorized, and accurately recorded in Infinigate’s books and records. You must never—directly or indirectly—offer anything of value

¹ A public official is any of the following:

- An elected official or employee of any government, governmental agency, ministry or department of a government (at any level).
- Any person acting in an official capacity for a government, regardless of their position.
- Any official or employee of a company wholly or partially controlled by a government but excluding employees seconded to such company.
- Any employee (of any level) of a state-owned company.
- A political party or any member of a political party.
- Any candidate for political office.
- Any officer or employee of a public international organization, such as the United Nations or the World Bank
- Any immediate family member (meaning a spouse, dependent child, parent or household member) of any of the above.
- Any employee, official or representative of any government or public or international organization, any political candidate or a close family of any of the aforementioned.

to improperly influence the actions or decisions of any person, whether a public official or a private party, in pursuit of Infinigate's business interests.

- Exercise particular care and integrity when dealing with public officials². Gifts, hospitality, or any other financial or personal advantages must never be offered, promised, given, or received – whether directly or indirectly – to or from a public official.
- Report any form of bribery or corruption they encounter or experience through the appropriate channels highlighted in [section 1.3 - How to report violations](#).

3.2 Anti-Money Laundering

Money laundering is the process of concealing the origins of assets obtained through criminal activity to make them appear legitimate. It supports serious crimes such as terrorism, corruption, drug trafficking, and tax evasion. Criminal proceeds can include money, property, or any other tangible or intangible assets derived from unlawful activity.

Infinigate is committed to full compliance with all applicable anti-money laundering and counter-terrorism financing laws. We conduct business only with reputable customers, suppliers, and partners engaged in lawful activities and using funds from legitimate sources.

Employees must:

- Exercise due diligence to understand the business background, ownership, and reputation of potential and existing business partners.
- Report any suspicious transactions or activities that may indicate money laundering or related offences immediately through channels highlighted in section 1.3 - How to report violations.

3.3 Conflict of Interest

A conflict of interest arises when personal relationships, external activities, or financial interests could influence, or appear to influence, an employee's judgment or actions when representing Infinigate. Personal relationships include spouses, immediate family members, relatives, and close personal friends.

All business decisions and transactions must be made in the best interests of Infinigate. Conflicts of interest that cannot be avoided must be disclosed promptly and in full. Managers and HR, in coordination with the Compliance Department, are responsible for assessing such disclosures, determining appropriate mitigating measures, and ensuring these are implemented.

Any directorships, employment, or other external assignments held by Infinigate employees with organizations that have or may have commercial relations with Infinigate must be reported to HR.

Employees must:

- Act in the best interests of Infinigate and avoid situations that create or may appear to create a conflict of interest.
- Avoid participating in any transactions or decisions on behalf of Infinigate in which they have, or could reasonably be perceived to have, a personal interest or potential benefit.
- Avoid holding interests in, or conducting business with, competitors, suppliers, or customers that could compromise objectivity.
- Refrain from conducting business on behalf of Infinigate with close friends or relatives.
- Immediately disclose any actual or potential conflict of interest in writing to their manager, providing all relevant details.

Managers must ensure that individuals with a declared conflict are removed from any related operations, influence, or decision-making processes.

3.4 Export Controls

Export control laws regulate and restrict the sale, shipment, transfer, or disclosure of certain goods, technology, software, services, and funds across national borders or to parties subject to economic sanctions. These laws may require customs documentation, licenses, or prior approval from national authorities before an export can take place.

Exports are not limited to the physical shipment of goods. They may also include electronic transfers, sharing of technical information, software downloads, discussions, or visual inspections that involve controlled items or data.

Infinigate is committed to full compliance with all applicable export control and trade sanction laws.

Employees must:

- Ensure that any cross-border transfer of goods, technology, software, or services complies with all legal requirements.
- Verify whether the items involved are listed as dual-use or military goods and whether any licenses or approvals are required before any export or transfer.

If you are uncertain about the export classification, restrictions, or licensing requirements, seek guidance from your manager or contact compliance@infinigate.com before proceeding.

3.5 Fair Competition

Antitrust and competition laws protect free and fair markets by prohibiting conduct that restricts competition or limits trade. These laws apply to all levels of business and forbid activities such as price-fixing, market-sharing, bid-rigging, or any behavior intended to establish or maintain an unfair monopoly.

Infinigate is committed to fair, open, and ethical competition. We do not tolerate any violation of antitrust or competition laws.

Employees must:

- Comply with all applicable antitrust and competition laws.
- Never obtain, receive, use, or share non-public competitively or commercially sensitive information (e.g. current or future prices, bids, costs) without a lawful and legitimate reason.
- Immediately notify your local Manager if you become aware of, or come into possession of, such information. Do not discuss or share it further.
- Seek guidance from a member of the Legal Team in any situation that may present an antitrust or competition law risk for Infinigate, yourself, or your team.

3.6 Confidentiality

In the course of your work at Infinigate, you may have access to information about our business, customers, suppliers, partners, regulatory bodies, or employees that is confidential or commercially sensitive. Such information is not publicly available and, if disclosed without authorization, could cause significant harm to Infinigate or its stakeholders.

Confidential information includes, but is not limited to:

- Financial data such as costs, profit margins, and discounts.
- Business strategies, marketing plans, and product development information.
- Contracts, customer and supplier details, databases, and contact lists.
- Meeting materials, reports, or communications concerning internal operations.
- Any other non-public information obtained through your role at Infinigate.

Employees must:

Always protect the confidentiality of Infinigate's information. This obligation applies before, during, and after employment.

Employees must not, unless authorized or required by law or their duties:

- Disclose or discuss confidential information with any unauthorized person or entity.
- Use confidential or proprietary information for personal gain or for the benefit of others; and,
- Attempt to obtain or exploit confidential information belonging to Infinigate after their employment ends.

The only exception to this rule is where disclosure is required by law or regulatory obligation. If you are unsure whether information is confidential, treat it as such and seek guidance from your manager or contact compliance@infinigate.com before sharing it.

3.7 Safeguarding of Property, Information and Assets

Infinigate's property, information, and assets must always be protected through appropriate security measures. Company assets – irrespective of whether tangible or intangible – are to be used solely for legitimate business purposes and only by authorized employees or designated representatives.

All information created, stored, or transmitted on Infinigate's IT systems is considered company property. The processing, downloading, or sharing of illegal, inappropriate, or unauthorized content is strictly prohibited.

Employees must:

- Protect Infinigate's property, information, and assets from theft, loss, damage, or misuse.
- Report any security incidents or breaches immediately to IT Security.
- Report any theft, waste, or misuse of company assets or information to IT Security, or HR; and
- Maintain electronic files, documents, and archives in an orderly and secure manner.

3.8 Anti-Harassment and Intimidation

At Infinigate, we treat everyone with fairness, respect and dignity. We do not tolerate any form of abuse, harassment, intimidation, degrading treatment or sexually offensive behaviour by or towards employees or others affected by our operations. Comments or any other forms of offensive messages, derogatory remarks or inappropriate jokes are unacceptable.

Employees must:

- Create a good working environment – free of all harassment. Never engage in abuse, harassment, bullying, workplace violence, sexually offensive behaviour or other behaviour that colleagues or business partners may regard as threatening or degrading.
- Respect other people's customs and culture.

- Report concerns of any situation in breach of the above principles, immediately through channels highlighted in section [1.3 - How to report violations](#).

3.9 Diversity, Equity and Inclusion

Infinigate is committed to ensuring that the unique contributions each employee brings to the company are encouraged. To ensure that everyone contributes to their talents we welcome, listen to and respect the ideas of people from different backgrounds.

Our employees can expect a workplace free from harassment and discrimination. We do not tolerate discrimination against any employee based on age, gender, sexual orientation, disability, race, nationality, political opinions, religion or ethnic background, or any other basis prohibited by law. Employees are employed, promoted and trained only based on their qualification and merit.

Employees must:

- Treat everyone with dignity, fairness and respect.
- Base work-related decisions on merit; and
- Report any form of discrimination which they may experience in the organisation immediately through channels highlighted in section [1.3 - How to report violations](#).

3.10 Human Rights

As outlined in the Universal Declaration of Human Rights, all human beings are entitled to all the rights and freedoms of life, liberty, security as well as recognition irrespective of their race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. No human being should be subjected to torture, slavery or to arbitrary interference with his privacy, family, home or honour.

We have a zero-tolerance approach towards any form of human rights abuse.

We are committed to implementing and enforcing effective systems to assess, monitor and minimize the risks of human rights infringements in our own operations and in our supply chain.

We have a zero-tolerance approach towards any forms of human rights abuse.

Employees must:

- Respect all human beings irrespective of their nationality, residence, gender, race, ethnicity, religion and cultural heritage, political or cultural affiliation.
- Refrain from depriving any human from the fundamental rights of freedoms of life, liberty, enjoyment, security as well as recognition.

- Refrain from exposing any employee or human being to torture, cruelty, inhuman and degrading treatment or any other form of human rights abuse.

3.11 Labour Rights

We do not and will not use or accept child or forced labour and will not tolerate unfavourable working conditions that conflict with international laws and practices and / or force employees to perform any tasks by using violence or intimidation.

Furthermore, we acknowledge employees' right to form and join trade unions of their choice as well as their right to collective bargaining.

Employees must:

- Refrain from causing any infringement of human and labour rights by respecting the personal dignity, privacy and personal rights of all colleagues and those affected by our business operations.
- Report any form of human and labour rights abuse they witness or experience immediately through channels highlighted in section [1.3 - How to report violations](#).

3.12 Protecting the Environment

At Infinigate, we act responsibly with an ambition to reduce our impact on the environment. We adhere to all relevant international and local laws and standards, striving to minimise our direct environmental impact. We are committed to operating responsibly and playing an active role in the transition to a low-carbon, climate-resilient future. We recognise that our operations, products, and partnerships have an environmental footprint, and strive to reduce our impact while promoting sustainable digital transformation across our industry. Everyone at Infinigate shares responsibility for protecting the environment.

Employees must:

- Follow internal sustainability policies and procedures.
- Use energy, materials, and equipment efficiently.
- Dispose of electronic and general waste responsibly.
- Choose sustainable travel options where possible and avoid unnecessary travel.
- Report environmental hazards, incidents or policy breaches immediately through channels highlighted in section [1.3 - How to report violations](#).