



# Infinigate Group Whistleblowing Policy

## Classification:

Sensitivity label

Public

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IFG-GOV-STD- Infinigate Group Whistleblowing Policy-V2.0



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# 1. Introduction

Infinigate is committed to maintaining the highest standards of openness, accountability, and ethical business conduct. We will promptly investigate all good faith allegations to determine whether there has been a violation of law, regulation, our corporate policies and procedures, or any other potentially unethical behaviour.

This Policy was developed in compliance with the relevant legal requirements and current best practices relating to the protection of Whistleblowers in accordance with EU Directive 2019/1937 of 23 October 2019.

## 2. Purpose of this Policy

To maintain our culture of compliance, it is essential for Infinigate to be able to detect, investigate, and remediate potential misconduct as quickly and efficiently as possible. As such, all Infinigate personnel (including all directors, officers, employees, or other parties acting for or on Infinigate's behalf) are encouraged to promptly report any concerns and fully cooperate with investigations.

### 2.1 How is a report submitted?

You may report your concerns to the Infinigate Compliance Officer under [compliance@infinigate.com](mailto:compliance@infinigate.com). Infinigate personnel may also raise any concerns with the designated reporting officers, the Chief People Officer, or the General Counsel. You may speak with them in person, or you may prefer to raise your concerns in writing (e.g., by email).

However, there may be circumstances in which reporting to the channels described above will not be appropriate (e.g., for an external stakeholder), or the person reporting concerns (the "Whistleblower") may wish to voice their concerns anonymously. In these circumstances, we encourage Infinigate personnel and external stakeholders to report concerns through the Infinigate Whistleblower Platform available here: [Whistleblowersoftware.com/secure/infinigate](https://whistleblowersoftware.com/secure/infinigate). The platform is hosted by an external partner and managed by the Infinigate Whistleblower Committee. It is not a part of Infinigate websites or intranet.

We urge all Whistleblowers to include as much information as possible in their reports to ensure a proper investigation, including the date, time, location as well as names and roles of people involved if necessary.

### 2.2 Who can submit a report?

The Whistleblower Platform can be used by all Infinigate personnel as well as external parties.

## 2.3 What is reportable conduct?

The Whistleblower Platform can be used to report any form of behaviour that is unethical or may violate Company policies, procedures, or applicable laws, including:

- Human and labour rights abuse.
- Corrupt, dishonest, and fraudulent dealings including bribery.
- Violence, theft, and other illegal activities.
- Competition issues or anti-competitive behaviour.
- Health and safety issues.
- Harassment and discrimination based on gender, sex, and religion; and
- Any other behaviour that violates Infinigate’s policies and procedures or applicable laws.

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 external stakeholders about quality of service or scope of information provided in relation to products and services offered.

## 2.4 Investigation process

All reports submitted will be evaluated by the Company’s Whistleblower Committee, which has been established to receive and review reports.

After the report has been received, the Whistleblower will be provided with confirmation of receipt latest seven days after the receipt of the report. The extent of the investigation will depend on the magnitude of the concern raised. The Whistleblower Committee will update the Whistleblower Platform to reflect the progress of the investigation.

Once the investigation is concluded, the Whistleblower Committee will notify the Whistleblower of this fact. Feedback will be provided within three months of the confirmation of receipt, or six months in exceptional cases.

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

## 2.5 Confidentiality and protection for Whistleblowers

A Whistleblower concern can be reported either confidentially or anonymously.

Confidentiality is critical for the integrity of our investigations, and all Whistleblower reports will be handled with the strictest confidence to ensure compliance with applicable laws. If a report was provided anonymously, the Company will implement measures to protect the reporter's anonymity.

## 2.6 Anti-Retaliation Policy

Infinigate does not tolerate and strictly prohibits all forms of retaliation against anyone who speaks up in good faith or assists another person in doing so. No Infinigate personnel or stakeholders should suffer retaliation or reprisals for:

- Raising in good faith a concern about potential misconduct.
- Refusing to do something that violates Infinigate policies and procedures, or the law; or
- Cooperating with an investigation or audit.

Any retaliation against Infinigate personnel or stakeholders may result in disciplinary action, up to and including termination of employment. Anyone who believes that they have (or that anyone else has) suffered any retaliatory treatment or reprisals for reporting good faith concerns should immediately inform the General Counsel ([compliance@infinigate.com](mailto:compliance@infinigate.com)).

March 2026