



Group Modern Slavery and Human Trafficking Statement

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1. Introduction

At Infinigate we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery, human trafficking and child labour in our operation and supply chain. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement robust steps to prevent slavery and human trafficking.

We will continuously monitor our modern slavery and human trafficking-related risk across the Infinigate Group (Infinigate Holding AG and its subsidiaries, hereinafter “**Infinigate**”) and review this statement on an annual basis. Where additional compliance is required, we will adhere to local laws and regulations.

This statement is valid for the financial year 2026, ending on 31st March 2026. The Board of Directors approved this statement on 19/03/2026.

2. Our Business

Infinigate is a leading IT Value Added Distributor and trusted advisor in cybersecurity, cloud, and network infrastructure. Headquartered in Switzerland, Infinigate has over 1,400 employees across Europe, the Middle East, North and South Africa, and Australasia. 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.

2.1 Our Supply Chain

Infinigate operates within a complex and extended global value chain that underpins the development, distribution and use of secure digital products and services. The upstream supply chain consists predominantly of cybersecurity vendors who produce software, hardware and provide services, which Infinigate distributes onto the end-user. Beyond the cybersecurity vendors, Infinigate interacts with 3rd party suppliers who service operational models centered around offices, warehouses and distribution. We do not manufacture any hardware or develop any bespoke applications.

Infinigate have only mapped its tier-one suppliers in relation to this statement.

3.Relevant Policies

Infinigate is committed to the highest standards of ethical conduct in our internal operations, as well as our supply chain. The following codes of conducts and policies ensure that Infinigate prevents and mitigates the risk of modern slavery and human trafficking in our organisation and supply chain.

- **Infinigate Code of Conduct and Ethics** – sets out the fundamental principles, standards and conduct that enable our employees to successfully pursue our mission, accomplish our goals and promote our values. The code sets out Infinigate’s commitment to implement and enforce a zero-tolerance approach towards any form of human rights abuses as defined by the Universal Declaration of Human Rights.
- **Infinigate Supplier Code of Conduct** – sets out the expectations that suppliers practice full compliance with all applicable laws and international standards. This includes the Universal Declaration of Human Rights, the core conventions of the International Labour Organization on labour standards, and all applicable local, national and international laws.
- **Third Party Management Policy** – sets the framework for the approach Infinigate takes in managing relationships with third party suppliers, including the risk management of modern slavery and human trafficking within the due diligence, and monitoring and evaluation stages of the third-party management lifecycle.
- **Whistleblowing Policy** - sets the framework for the Infinigate whistleblower platform which can be used to report any perceived or actual fraudulent conduct, improper ethical behaviour or other wrongdoing within the company and the supply chain. Incidents can be securely reported here: <https://whistleblowersoftware.com/secure/infinigate>.

These policies are communicate and enforce these policies internally through annual employee training and, where applicable, externally through supplier engagement.

4.Risk Assessment

Within the geographical scope of this statement, Infinigate’s operations and tier 1 supply chain are considered at a low risk of the potential for modern slavery or human trafficking. Based on review of the Global Slavery Index ([Global Slavery Index | Walk Free](#)) and the Children’s Rights in the Workplace Index ([childrens rights and business atlas data Juni2023.xlsx](#)), Infinigate’s revenue are predominantly derived from countries deemed as low risk. We continue to assess the risk of our operations and tier 1 suppliers on an annual basis, as well as through our due diligence process.

5. Due Diligence Processes

Our due diligence process is central to our approach to managing the risks of modern slavery and human trafficking. We undertake due diligence when considering taking on new suppliers and when reviewing our existing suppliers.

The due diligence process includes:

- **At Selection**, we identify potential third parties and assess suitability through financial, legal, operational, and compliance checks, which includes an information request from the prospective suppliers.
- **During onboarding**, our suppliers are required to agree to our Supplier Code of Conduct or provide evidence that they have implemented their own Code of Conduct with similar or stricter scope.
- **In our agreements**, we require our suppliers to comply with applicable laws. In addition, our standard contractual terms include obligations on our suppliers to comply with our position regarding anti-slavery, human trafficking and child labour.
- **During our contracts**, we may perform assessments on material suppliers to ensure their compliance with applicable laws and our Supplier Code of Conduct.

The due diligence process is a Group-wide standard for which all regional operations are expected to comply with. Currently, this standard has been adopted to varying levels of maturity and continues to be rolled out to meet the Group's standard.

6. Continuous Improvement and Training

We will continue to identify ways to improve employee and supplier awareness of Infinigate's commitment to respect human rights and efforts to prevent modern slavery and human trafficking.

We will do this through:

- **Supplier Engagement**: prospective and existing suppliers are periodically requested to provide information on their compliance programmes.
- **Supplier Acknowledgement**: suppliers formally acknowledge and adopt the Supplier Code of Conduct.
- **Grievance Mechanism Utilisation**: supplier-related concerns or violations are reported through the Infinigate whistleblower platform and resolved through the company's grievance mechanism.
- **Supply Chain Risk Management**: supply chain-related risks are continuously managed through our group risk management approach.

- **Employee Awareness & Training:** employees are trained on modern slavery risks and the Infinigate code of conduct and ethics.
- **Continuous Role-Out of Group Standards:** ensure the ongoing Group due diligence process is adopted at to a high standard across all of our regional operations.

7. Key Performance Indicators

The following key performance indicators are monitored to assess the effectiveness of Infinigate's Modern Slavery and Human Trafficking programme as well as the inherent risk within our supply chain.

- Employee participation in code of conduct and ethics training, monitored through our e-training platform.
- Risk exposure to Tier 1 suppliers, monitored through our third-party management platform.
- Modern slavery and human trafficking-related concerns raised, monitored through whistleblowing and grievance channels.

8. Conclusion

We continue to have we have a zero-tolerance approach to modern slavery and human trafficking within our operation and supply chain at Infinigate. This Modern Slavery and Human Trafficking Statement sets out our current position and is subject to annual review and approval by the Infinigate Board of Directors, or sooner in response to significant changes in Infinigate's business practices or applicable law and regulations.