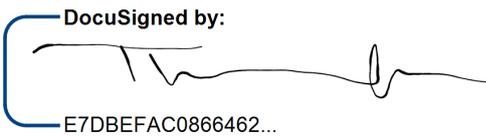


Åpenhetsloven Norwegian Transparency Act Infinigate Statement

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Approved by Thomas Ludvik Næss

Date June 2023

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Åpenhetsloven / Transparency Act

The Act on Business Transparency and Work with Basic Human Rights and Decent Working Conditions shall promote businesses' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. By focusing on responsible business policies and due diligence required by the act, it is expected that the it will lead to improvements in these areas and that the information available will allow consumers to make more informed choices.

The Infinigate Group is the EMEA value-add distributor specialising in cybersecurity, secure networks and secure cloud for SMB and enterprise market segments.

We establish a relationship of trust and integrity with all our suppliers, built upon mutually beneficial factors. The organisation is absolutely committed to responsible business conduct, in compliance with the guidelines set out by OECD as required by the Åpenhetsloven / Norwegian transparency Act.

This statement certifies that Infinigate AS has taken and will continue to take to take steps to ensure that no form of human rights violations is exercised in connection with our business.

Responsibility

Infinigate Group Leadership is responsible for reviewing this statement, process and due diligence and ensuring that Infinigate, creates and maintains policies and practices as identified in the statement.

Due diligence

The due diligence assessments must ensure that all companies covered by the law have a mindful and risk based attitude to possible violations of human rights or a lack of decent working conditions among their employees and business relationships.

At Infinigate we are following the guidance as set out in the OECD guidelines to assist in clarifying how our company can identify and better manage risks throughout our supply chain.



We have followed the steps to ensure we are assessing any possible risks to human rights and working conditions.

Step one: Embed responsible business conduct into policies and management systems

Our policy for Responsible Business Conduct (RBC) applies to ourselves and all partners we do business with. Our policies, including our supplier code of conduct, are available on our website, in the spirit of transparency. As part of the onboarding processes, our suppliers are required to sign our Supplier Code of Conduct or provide evidence that they have implemented their own Code of Conduct with similar or stricter scope.

Step two: Identify and assess adverse impacts in operations, supply chains

The purpose of due diligence is first and foremost to avoid causing or contributing to adverse impacts on people, the environment and society, and to seek to prevent adverse impacts directly linked to supply chain products or services through business relationships.

We have assessed and implemented risk methodology in relation with our suppliers. Following the guidelines, we have formulated criteria to measure the suppliers' operations (?) including but not limited to mapping the company head office to the Modern slavery index; availability of policies including code of conduct / ethics or human rights, supplier code of conduct, bribery and anti corruption policies; whistleblowing or report mechanism across the suppliers websites; transparency with available reporting; financials, accessible through Bronnoysundregistrene or local country if not in Norway and overall business reputation within our company.

Read more about the due diligence assessments

Step three: Cease, prevent or mitigate adverse impacts

'Cease, prevent and mitigate' is about efficiently managing findings from the risk assessment through prioritisation and implementing plans to prevent or mitigate actual or potential adverse impacts on responsible business conduct which are directly linked to our business.

The Infinigate senior leadership has been involved in the discussion and implementation of the due diligence and review process. From the risk assessment scores we can confirm we have low risk of violations of human rights or a lack of decent working conditions for employees and business relationships in our Infinigate supply chain. We have implemented a whistle-blowing platform which is available to anyone to report possible violations of human rights.

Step four: Track and Assess

The company needs to have procedures and processes in place in order to uncover and critically assess own conclusions, prioritisations and measures that have been made as part of the due diligence process.

Activities and performance on social issues are currently tracked internally with our business risk assessment methodology. As this is our first step in the process of transparency reporting, Infinigate have recognised the importance to centralise the data across our

business as well as our suppliers responsible business conduct and will be implementing an Environmental, social and governance platform to assist us in our journey.

Step five: Communicate

We promote and seek open dialogue with our suppliers, understanding of how they run their company. Should any of our suppliers have involvement in adverse impacts we will use due diligence to assess them, where relevant assist to remediate them.

As part of our research we currently have no high risks noted for the suppliers we have reviewed as part of our materiality criteria. We will continue to monitor and build relationships with all suppliers.

Training

Focus, respect and knowledge are important if we want to achieve our shared goals; to ensure a high level of understanding of responsible business conduct we are implementing code of ethics and conduct training across the Infinigate business from June 2023. these training modules will create awareness on a wide range of topics for all of our employees to ensure effective understanding.

Step six: Facilitate remediation when appropriate

Our senior leadership team is committed to the transparency process and will be available to discuss and remediate any negative impact on people, society or the environment. Breaches require a proactive and systemic approach, and a key part of our due diligence process is remediation support. We commit to closely follow up any situation that may arise, providing assistance and resolution where possible.

On the 30th June 2023 we have not found any suppliers in direct violation of our code of conduct or received any reports from our stakeholders regarding any violation of Basic Human Rights and Decent Working Conditions.