

2022

ESG Policy

English version

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1 Introduction

The responsibility of a company towards its stakeholders as well as the environment begins with its core principles and the principles by which they conduct their business. This policy describes the Environmental, Social and Governance (ESG) factors that will form the standard for our operations and how we interact with our stakeholders.



Infinigate does align its ESG policy with the Ten Principles of the UN Global Compact. By implementing the Ten Principles of the United Nation Global Compact (UNGCC) 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.

The United Nations Global Compact is an international strategic policy initiative that prompts organizations around the world to operate in a manner that meets the fundamental needs for human rights, labour, environment, and Anti-Corruption. The 10 principles of the United Nations Global Compact are derived from the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

2 Our Vision and Mission Statements

2.1 Our Vision Statement

We strive to become a global leader by enabling our partners to grow faster and create a secure digital world.

2.2 Our Mission Statement

We strive to accelerate our partners growth by providing leading cyber security solutions with unmatched service quality, responsiveness and best local market access leveraging our fully digital platform.

3 The UN Global Compact's Ten Principles

Human Rights

Principle 1: Support and respect the protection of internationally proclaimed human rights.

Principle 2: No complicity in human rights abuses.

Labour

Principle 3: Uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: No forms of forced and compulsory labour.

Principle 5: Effective abolition of child labour.

Principle 6: No discrimination in respect of employment and occupation.

Environment

Principle 7: Precautionary approach to environmental challenges.

Principle 8: Promotion of greater environmental responsibility.

Principle 9: Encouraging the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: No tolerance on corruption in all its forms, including extortion and bribery.

3.1 Human rights

3.1.1 Principle 1: Support and respect the protection of internationally proclaimed human rights

As proposed by the Universal Declaration of Human Rights (UDHR), all human beings are born free and should be considered equal in dignity and rights. As such, they 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 shall be subjected to torture, slavery or to an arbitrary interference with his privacy, family, home or honour. The human rights can be divided into the following main principles: universality, inalienability, indivisibility and interdependency.

This implies:

- **Universal:** All people are born with and are entitled to the same human rights, regardless of nationality, residence, gender, race, ethnicity, religion and cultural heritage.
- **Inalienable:** Human rights should not be taken away or compromised except in specific situations and according to due process.
- **Indivisible:** All human rights should be equally considered. Civil and political rights are of equal importance to economic, social and cultural rights.
- **Interdependent and interrelated:** Human rights are mutually reinforcing. The enjoyment of one human right often relies wholly, or in part, on the existence of other human rights. Similarly, the interference of one human right often negatively affects other human rights.

At Infinigate, our commitment to respect all human rights is imbedded into our Code of Conduct in section 5.3.

In our Code of Conduct, we not only state our zero tolerance towards human rights abuses, but we also state our commitment to respect all human beings irrespective of their nationality, residence, gender, race, ethnicity, religion and cultural heritage, political or cultural affiliation.

We encourage all employees to report any case of human right abuse in they may experience to their direct supervisor.

3.1.2 Principle 2: No complicity in human rights abuses

Human rights abuses include but are not limited to slavery, servitude and slave trade of any form. No human being should be subjected to torture, cruel, inhuman, or degrading treatment or punishment.

An infringement on all forms of Human rights defined by the International Bill of Rights, which consists of the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social and Cultural Rights (ICESCR) is considered a form of human rights abuse.

Infinigate is committed to minimizing any effects the business may have in relation to human rights abuses. This commitment is mentioned in our Code of Conduct in section 4.3.

Furthermore, in paragraph 5.3 of our Code of Conduct, we encourage all our employees to report any form of Human rights abuses they may experience.

It is stated in all employment contracts that the rules and regulations stated in the code of conduct need to be read and implemented in their daily business activities. A violation of the terms stated in the code of conduct may lead to sanctions as well as dismissal.

3.2 Labour

3.2.1 Principle 3: Freedom of association and the effective recognition of the right to collective bargaining

Freedom of association implies respect for the right of all employees and the employer to freely and voluntarily establish and join groups for the promotion and defence of their occupational interests. Both employees and employer have the right to set up, join and run their own organizations without interference.

Our commitment to respecting employees’ basic labour rights is expressed in paragraph 5.4 of our Code of conduct. Here we also outline our commitment to support employees if necessary to join regarding freedom of association and collective bargaining.

3.2.2 Principle 4: Elimination of all forms of forced and compulsory labour

Forced labour can be defined as work that is not performed voluntarily and which is performed under the menace of any penalty. It refers to situations in which people are tricked with violence, intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities to perform a form of work or labour.

The key terms mentioned in the above definition are described below:

- Menace of any penalty = Wide range of penalties used to compel someone to work.
- Involuntariness = The term “offered voluntarily” refer to the free and informed consent of an employee to take a job and his or her freedom to leave in accordance with established rules.

Below are some examples of forced labour in Practice:

Box 4
Identifying forced labour in practice

<p>Lack of consent to work (the “route into” forced labour)</p> <ul style="list-style-type: none"> • Birth/descent into “slave” or bonded status • Physical abduction or kidnapping • Sale of person into the ownership of another • Physical confinement in the work location – in prison or in private detention • Psychological compulsion, i.e. an order to work, backed up by a credible threat of a penalty for non-compliance • Induced indebtedness (by falsification of accounts, inflated prices, reduced value of goods or services produced, excessive interest charges, etc.) • Deception or false promises about types and terms of work • Withholding and non-payment of wages • Retention of identity documents or other valuable personal possessions 	<p>Menace of a penalty (the means of keeping someone in forced labour)</p> <ul style="list-style-type: none"> • Physical violence against worker or family or close associates • Sexual violence • Imprisonment or other physical confinement • Financial penalties • Denunciation to authorities (police, immigration, etc.) and deportation • Exclusion from future employment • Exclusion from community and social life • Removal of rights or privileges • Deprivation of food, shelter or other necessities • Shift to worst working conditions • Loss of social status
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Nonetheless, there are 5 situations as described by the ILO Forced Labour Convention which are an exception to the term “forced labour” mentioned above.

These include compulsory military service, normal civic obligations, prison labour (under certain conditions), work in emergency situations (such as war, calamity or threatened calamity e.g., fire, flood, famine, earthquake), minor communal services (within the community).

At Infinigate, we do not tolerate any form of forced labour. It is strictly stated in our Code of conduct, section 4.3 that all the work performed by our employees will be done voluntarily and not under any form of threat. Also, the tasks agreed upon by the employee and the employer in the employment agreements or any other signed contracts must be respected. Employees are advised to immediately report any form of forced labour in the organisation through the appropriate channels.

3.2.3 Principle 5: Effective abolition of child labour

The International Labour Organization (ILO) specifies that not all work done by children should be classified as child labour and should be eradicated. Child labour should not be confused with “youth employment”. Young people are encouraged to engage in decent work which may promote their educational and mental growth, but they still need protection from hazardous work and other forms of child labour.

As described by the International Labour Organization, Child labour can be considered as any form of work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development.

The term “work” mentioned above relates to tasks that are:

- mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

If a specific “work” done by a child is considered child labour depends on the age of the child, the number of hours worked and the country in which the child is found.

See below the minimum age for admission to work for different countries.

Box 5		
Minimum Age for Admission to Employment or Work		
	Developed Countries	Developing countries
Regular Work	15 years	14 years
Hazardous Work	18 years	18 years
Light work	13 years	12 years

Source; The labour Principles of the United Nations Global Compact, Page 27

Nonetheless, below are a few examples of child labour relevant for our industry, which are considered by the International Labour Organization Convention as a form of exploitation and is a violation of human rights. They include:

- the different forms of slavery or slavery practices such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflicts.
- the use, procuring or offering of a child for illegal activities for the production and trafficking of drugs as defined in the relevant international treaties.
- work which, by its nature is likely to harm the health, safety or morals of a child. This is also known as "hazardous child labour". Hazardous work here includes; work which exposes children to physical, psychological, work underground, under water, at dangerous heights or in confined space, work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads, work under particularly difficult conditions such as work for long hours or during the night and work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health.

Infinigate, being a value service provider in the Information and Technological sector has very little impact in terms of child labour due to the nature of the business. Infinigate is mostly located in developed countries. Furthermore, mostly skilled, trained and/or educated employees are employed at Infinigate and this therefore reduces our exposure to child labour and child labour practices.

Furthermore, the lack of massive warehouses in the organization reduces the probability of child labour being present in the organization.

Nonetheless, we are committed to eliminating any forms of child labour which could be found in our organization and supply chain.

In section 4.3 of our code of conduct, we clearly state our commitment to prevent any forms of child labour in our organisation. Furthermore, our managers and human resource employees are advised to do identification checks when hiring employees in order to limit the probability of hiring underaged employees.

3.2.4 Principle 6: Elimination of discrimination in respect of employment and occupation.

No employee should be discriminated based on any external factors such as their race, colour and sex, country of origin or any other factors. Discrimination in respect of employment and occupation comes into practice when a potential candidate or an employee is treated differently or less favourably because of certain characteristics that are not related to his/her merit or the inherent requirements of the job. Some of these characteristics include but is not limited to race, colour, sex, religion, political opinion, national extraction, or social origin.

The term discrimination mentioned above specifically includes any distinction or exclusion made when hiring an employee based on race, colour, sex, religion, political opinion, national extraction or social origin which may affect the equality of opportunities or treatment of employees or potential employees in an occupation

Non-discrimination here simply implies that employees should be selected based on their suitability and qualification to do the job they are being hired for and there should be no distinction, exclusion or preference made on other external grounds.

Infinigate has a stringent non-discrimination policy. We are committed to only employing employees based on their qualification and not on any external factors such as race, gender, sexual orientation, disability, race, nationality, political opinions, religion or ethnic background.

Furthermore, it is clearly stated in the employment contracts and/or the employee handbook that employees are prohibited from discriminating anyone in the workplace on the grounds of age, origin, religion, skin colour, gender, disability, sexual identity or other attitudes and affiliations.

We encourage all employees to report any case of discrimination which they may experience to their direct supervisor. Furthermore, we have implemented a Whistle blower platform where any form of abuse can be reported directly or indirectly to the appropriate channels.

3.3 Environment

3.3.1 Principle 7: Precautionary approach to environmental challenges

The term precautionary approach here as stated by the United Nations Conference on Environment & Development from 1992 implies that “where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation”.

This implies that organizations should take every precaution to reduce the negative impact of their activities on the environment should harm arise, even in the absence of scientific evidence.

As mentioned in our Code of Conduct in point 5.5 Infinigate is committed to reducing directly and indirectly any negative influences our organization might have on the environment. We intend on assessing what our environmental risk may be and implementing necessary methods to manage these risk in a timely manner to avoid any serious or irreversible damage.

Furthermore, our Environmental, Social and Governance plan and road map outlines our goals and objectives in relation to our corporate responsibility to environmental challenges.

3.3.2 Principle 8: Undertake initiatives to promote greater environmental responsibility.

The United Nations Conference on Environment & Development from 1992 furthermore suggest that organizations have the responsibility to ensure that activities within their own operations do not cause harm to the environment. It also states that "Business and industry should increase self-regulation, guided by appropriate codes, charters and initiatives integrated into all elements of business planning and decision-making, and fostering openness and dialogue with employees and the public."

At Infinigate we are committed to developing clear strategies and policies to promote our environmental responsibility. We have developed an Environmental, Social and Governance plan and road map which outlines our Vision, mission, our goals and sustainability targets. We plan on implementing this plan in the near future to assist us in measuring, tracking, communicating and improving our environmental impact. With this plan and objectives, we hope to become more environmental responsible and contribute to a better world.

3.3.3 Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Different forms of technologies have different effects on the environment.

Environmentally friendly technologies, as defined by the United Nations Conference on Environment & Development from 1992 consist of technologies which are more protective for the environment, less pollutive, use all resources in a more sustainable manner, recycle more of their waste and handles residual waste in a more acceptable manner than the technologies for which they were substitutes.

Infinigate intends not only to educate its employees on the importance of environmental technologies but also plans on implementing some climate friendly mechanism on site to reduce our effect on the environment. Some of these actions include but are not limited to:

- Using electronic equipment's such as laptops and monitors longer
- Recycling all used electronics or refurbishing them for donations
- Turning off all the lights in the office when leaving the office
- Turning off all computers when leaving the office for a longer period

We hope these implemented actions will not only help our company to save cost but also reduce any negative impact our business may have on the environment.

3.4 Anti-Corruption

3.4.1 Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

The purpose of the 10th principle of the United Nations Global Compact was to encourage organizations not only to avoid bribery, extortion and other forms of corruption but also to develop policies to address any form of corruption internally and within its supply chains.

Corruption can be described as the abuse of the power entrusted to a higher official or an employee for private gain as proposed by the Organization for Economic Co-operation and Development.

Bribery on the other hand, as defined by the Organization for Economic Co-operation and Development, can be considered as any offering, promising, giving, accepting, or soliciting of an advantage as an incentive for an action, which is illegal, unethical, or a breach of trust or to refrain from acting. Bribery is a general term and consist of different forms.

The most important forms of bribery relate to:

- Kickbacks = Bribes which take place in purchasing contracts after an organization has awarded a contract to a customer
- Facilitation payments = Small payments made to speed up an ongoing process in favour of the payer
- Charitable and political donations = Occurs when a charity donation is used as a cover for bribery or other private gains
- Conflict of interest = Occurs when an employee or entity becomes unreliable because of a clash between personal (or self-serving) interests and professional duties or responsibilities.
- Collusion = This form of corruption can take various forms and includes Bid Rigging (when firms coordinate their bids on procurement or project contracts), Cartels (a collusion between enterprises to commit illicit actions or fraud) and Price Fixing (agreement among competitors to raise, fix, or otherwise maintain the price at which their goods or services are sold).
- Revolving door = Corruption associated with high-ranking officials in an organization moving from public sector jobs to private sector jobs and vice versa
- Patronage = A form of favouritism where a person is selected, regardless of qualifications, merit, or entitlement, for a job or benefit because of affiliations or connections
- Tax evasion = The illegal non-payment of tax to the government of a jurisdiction to which it is owed by a person, enterprise, or trust who should be a taxpayer in that place.

Our Code of Conduct mentions in points 4.1, 4.3 and 4.5 our commitment to eradicate any form of Bribery, Corruption, Extortion as well as Conflict of Interest in our Organisation. Here we encourage all

employees to ensure that all payments made are proper, legal and approved by relevant Infinigate personnel, and that they are recorded accurately in the Infinigate books and records.

Furthermore, our Code of Conduct states that employees should actively contribute to combating corruption and should strive not to expose themselves to bribery or the acceptance of advantages.

The thresholds of what may be accepted as a gift and what must be reported is clearly defined in our employee contracts and employee handbooks. All Infinigate employees are required to report any form of bribery or corruption they encounter or experience to the appropriate authorities.

Furthermore, we have implemented a Whistle blower platform where any form of corruption, bribery or extortion can be reported directly or indirectly to the appropriate channels.

4 Sources

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