

## Statement of Principles on Respect for Human Rights

The scope of this statement covers all individuals and communities affected by our activities and our value chain.

### Commitment to respecting human rights and environmental concerns

Infomaniak recognises the indisputable value of respect for human rights and the protection of the environment. We place the human being at the centre of all our actions and consider ourselves, as a company, accountable to our employees as well as to all persons working with and for us along our value chain. The safety, health and well-being of all those involved, together with the protection of the environment, play a central role and are deeply rooted within our company on the basis of recognised national and international standards.

Mutual respect, trust, transparency and fairness — within our own area of activity and in our interactions with our partners — are fundamental principles of our corporate culture. To these is added a formal commitment to the following international human rights standards:

- Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- Ten Principles of the United Nations Global Compact
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

We are convinced that sustainable business practices can only succeed when they involve the entire value chain. For this reason, we expect not only all our employees but also our business partners to comply with the applicable principles and provisions, as well as with internationally recognised standards on human rights and environmental protection.

### Human rights are our responsibility

In our risk analysis, we examine — annually and on an ad-hoc basis — the potential and actual adverse impacts on human rights and on the environment caused by our own business activities, as well as by those of our partners. In order to act proactively, we devote particular attention to areas presenting specific risks within our human rights due diligence processes. We exercise our

influence both upstream and downstream in the value chain and expect our current and future partners to address the following risks and to require their own partners to comply with the standards applicable across the sector.

## **Prohibition of child labour**

We strictly refuse any form of child labour in accordance with the [relevant ILO Conventions](#), the international Conventions on Human Rights and on the Rights of the Child, and we actively work to eliminate it ([Convention 138](#), [Convention 182](#)).

Our internal and external guidelines and provisions are always aligned with the [ILO core labour standards](#). It is our duty to safeguard the safety and health of children through targeted measures. For this reason, we verify, for example, that candidates meet the minimum age required for employment and we monitor which activities persons under the age of 18 are permitted to carry out.

## **Prohibition of forced labour**

We tolerate no form of forced or compulsory labour, nor any other form of modern slavery or human trafficking. In accordance with the ILO core standards ([Convention 29](#), [Convention 105](#), [2014 Protocol](#)), we reject any use of forced or unlawful labour in all areas of our business activities and within our value chain. All employment contracts, whether with Infomaniak or with partners we have engaged, must be entered into on a voluntary basis. It must be possible to terminate any employment relationship subject to a reasonable notice period as provided by law.

## **Freedom of assembly, right to collective bargaining and right to strike**

We respect the right of our employees to form associations and to engage in collective bargaining concerning working conditions, as well as to exercise their right to strike in accordance with applicable national and international law ([Convention 87](#), [Convention 98](#)). The company and the employee representatives undertake at all times to cooperate constructively and in mutual trust. Membership or non-membership of a trade union or employee representation entails no advantage or disadvantage within our company ([Convention 135](#)).

## **Code of conduct, ethics and anti-corruption practices**

We have implemented a code of conduct, ethics and anti-corruption practices.

## **Non-discrimination and anti-harassment policy**

The company adheres to the principles of equal employment opportunity and is committed to making decisions solely on the basis of merit. We are committed to complying with all Swiss laws on equal employment opportunity as well as with any law governing the conditions of an employment contract. Our primary concern is to create a working environment free from

discrimination ([Convention 111](#)) based on sex, race, religion, colour, nationality, sexual orientation, physical or mental disability, marital status, age or any other personal characteristic protected by law. The company will take all necessary steps to accommodate the physical or mental disabilities of qualified candidates to the extent possible and reasonable.

Insofar as the company bears responsibility under this policy, each of us must clearly call out any contempt, offence or verbal or physical discrimination directed against any one of us. Management is responsible for upholding this policy and this commitment to giving each and every person the same employment opportunities. Equal employment opportunity laws allow each of us the chance to succeed or fail on the basis of individual merit.

Sexual harassment is defined as follows: unwelcome sexual advances, requests for sexual favours, sexual blackmail and any other non-consensual physical or verbal conduct of a sexual nature constitute sexual harassment. The company will not tolerate any form of discrimination or harassment ([Convention 190](#)).

Any employee who feels that they are a witness or victim of any form of discrimination or harassment must immediately inform their supervisor, HR, the trusted person or any company manager. It is preferable to submit your complaint in writing. Your confidentiality and that of any witness, as well as that of the alleged perpetrator, will be protected as far as possible against any unnecessary disclosure. We will immediately investigate the case and take the appropriate measures. We will apply the appropriate sanctions to any person found to be in breach of this policy. Such sanctions may take the form, among others, of a reprimand, suspension, demotion, transfer or dismissal.

The company prohibits any form of retaliation against any employee who has filed a complaint or who has taken part in an investigation concerning a complaint of discrimination or sexual harassment.

If you consider that your complaint has not been handled as it should have been, you may, once you have followed the procedure established by the company, lodge a complaint with any competent association or agency.

## **Commitment to diversity, equity and inclusion**

- All our job offers include a statement setting out our commitment to diversity, equity and inclusion. Gender-inclusive language is used.
- We review the form and requirements of our job descriptions to ensure that they are inclusive and equitable.
- The HR Manager is explicitly designated as responsible for diversity, equity and inclusion.

## **Right to health and safety in the workplace**

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Infomaniak attaches great importance to occupational safety and health protection ([Convention 155](#), [Convention 187](#)). The management system used throughout the group enables national and international occupational safety provisions to be implemented in all areas of activity and at all our sites. Infomaniak follows a preventive approach aimed at the continuous improvement of working conditions and at raising employees' awareness of health- and safety-conscious behaviour.

## **Working time**

Infomaniak's working-time guidelines take into account both the requirements of the company and the needs of employees. For us, the organisation of working time is an important factor in being an attractive employer. Reconciling professional and private life is an essential component of the company's HR policy. In this regard, we align ourselves with the ILO core labour standards and comply with all applicable national provisions relating to working time, leave (holiday and sickness/accident) and breaks. This includes, in particular, the compensation of overtime worked, in the form of time off in lieu.

## **Right to appropriate remuneration**

We offer our employees competitive and fair remuneration, supplemented by additional benefits. We apply the principle of equal pay for equal work ([Convention 100](#)). When determining salary levels, we apply the requirements and minimum remuneration in force and guaranteed by law in the relevant sector, where applicable. Wages and charges are paid punctually and in full in recognised currencies and may only be withheld on a sufficient legal basis with a corresponding justification within the framework of payroll accounting.

## **Education and qualification**

Infomaniak supports the education and continuing training of its employees in order to ensure a competitive level of quality and performance. Employees are supported in their professional development through numerous education and continuing-training initiatives. The objective is to continuously improve employees' qualifications, both as a contribution to the quality of employment and to embed the principle of lifelong learning.

## **Protection of local communities and indigenous peoples**

At Infomaniak, we take into account the local effects of our business activity and respect the rights of local communities and indigenous peoples that may be affected by our activity or that of our partners. Risks such as air, water and soil pollution, deforestation, improper management of hazardous waste, or groundwater abstraction in regions affected by water shortages are taken into account in our business activities. In the same way, we firmly oppose the destruction of cultural and ritual sites, as well as unlawful evictions and the seizure of land, forests and bodies of water.

## **Management of high-risk raw materials**

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Our approach aims to minimise adverse impacts on human rights and the environment associated with the handling of raw materials through a risk-based approach. The company is aware that some of the raw materials used in our products carry risks to human beings and the environment with regard to their procurement and processing, and therefore require particular attention. We act in this context in a manner consistent with national and international guidelines and provisions.

## Protection of personal data

We attach the utmost importance to protecting the individual rights of all employees, customers and partners concerning their personal data. This also applies to the personal data of all third parties with whom the company is in contact. We focus on compliance with the data protection laws in force and on the fair and responsible handling of personal data within the framework of our operating processes.

## Artificial intelligence governance

At Infomaniak, we set strict standards regarding the use of artificial intelligence (AI). We ensure that the human being remains at the centre of processes and we take potential risks into account. Our principles incorporate ethical ([OpenAI standards](#)) and legal aspects in the development and use of AI in order to shape the digital transition responsibly. We ensure that characteristics such as transparency, data protection, and the security and reliability of AI are guaranteed.

## Human rights and the environment

At Infomaniak, we are actively committed to [protecting the environment](#) and are aware of the potential impact of our products and of our manufacturing and supply processes on the environment and on human beings. For this reason, we ensure responsible management of human rights and the environment, both in our own area of activity and with our partners.

Through our [environmental and energy management policy](#), we are committed to acting sustainably in all areas of activity. We give priority to the responsible management of resources and to the efficient use of raw materials. We actively strive to avoid adverse environmental impacts.

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