



Modern Slavery Statement

Prepared by Wavelink Communications Pty Ltd

Date 11 August 2025

Wavelink Communications Pty Ltd ABN : 43 069 703 715, a subsidiary of Infinigate Holding AG submits this second modern slavery statement, as required under the Modern Slavery Act 2018 (Cth). The Infinigate Group, the leading technology platform and trusted advisor in Cybersecurity, Cloud & Network Infrastructure covers EMEA, Australia and New Zealand, delivering solutions and services supported by deep technical expertise and locally tailored services complementing a robust central supply chain, generating growth for partners, MSSPs and vendors.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Wavelink and Infinigate Holding AG have a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our corporate activities. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. Infinigate Holding AG have also submitted their own Modern Slavery Statement that can be accessed here [Modern Slavery Statement - Infinigate](#)

Wavelink only engages with resellers, partners, contractors, and vendors who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with all human rights laws.

This statement sets out Wavelink's actions to understand all potential modern slavery risks related to business and to ensure steps are maintained to prevent slavery and human trafficking.

Our Business

Wavelink is a technology software and hardware distributor providing local representation for global vendors, offering their technology solutions to local reseller networks within Australia and New Zealand.

Wavelink's offerings include cyber security, networking, mobility, unified communications, and applications.

Wavelink employs 67 staff, all based in Australia and conducts business from premises in Melbourne and Sydney.

Our Supply Chains and Supplier Adherence

Wavelink on-sells hardware and software technology products that are manufactured by our vendors overseas. Wavelink has no local manufacturing operations. The vendors manufacture hardware in the following countries; China, Taiwan, and the United States. Wavelink has long term relationships with these vendors and has worked with our largest cyber security vendor, Fortinet for 15 years.

To date, Wavelink has not been made aware of any human trafficking or slavery activities within Wavelink's supply chain. To the extent any such claimed activity is reported to or discovered by us, we would act immediately in accordance with our legal and moral obligations.

Risks of modern slavery practices in the operations and supply chains of Wavelink

Wavelink's main operations includes the 67 staff we directly employ. We ensure that the working conditions and entitlements meet all Fair work entitlements, the working environment is kept clean, staff take regular breaks and rarely work overtime. The standard work hours are 8:30am – 5:00pm AEST. If a staff member was to work overtime, we provide time in lieu or payment.

Some risks we have identified include manufacturing of hardware through our suppliers, Fortinet, SOTI and Spectralink. The Hardware is manufactured in factories based in China, Taiwan, and the United States. Wavelink sell these products through a network of local Resellers based in Australia.

To combat this risk Wavelink has gained an understanding of the actions our suppliers take to ensure there is no modern slavery. To gain this understanding we have a copy of Fortinet, Soti & Spectralink Modern Slavery Statements and have provided training to all our teams including our sales, procurement & leadership teams to ensure they consider Modern Slavery when managing these suppliers. As part of the training these teams are also advised to report any potential concerns to the People & Culture team to ensure it can be further investigated. Further to this, we are creating a register to track our suppliers and governance along with Modern Slavery compliance.

Other supply chains include the services that contribute to our operations, such as cleaners that service our office building, IT equipment suppliers and couriers that deliver the products to our resellers locally. Wavelink identified our office cleaners as a potential modern slavery risk. We have recently changed to a new cleaning company that came highly recommended as an ethical family business well known in the area, they charge at a standard market rate for the service and have a good reputation among other customers. We will continue to monitor any risks we see or hear about and investigate.

How Wavelink assesses the effectiveness of the above actions

The Wavelink People & Culture Team continue to monitor new employee entitlements and seek advice from our employment lawyers to ensure we remain compliant and continue to improve by doing more to reduce the risk of Modern Slavery in our business and associated operations.

Wavelink continue to monitor new and existing supplier Modern Slavery statements and practices by reviewing the copies we have saved in our files every quarter. We measure the completion rate of our Employee Modern Slavery Training via our online portal each quarter and send a follow up emails to employees that are yet to complete it. The governance register will also be reviewed monthly and there is a working group that have agreed to scheduled a call each month to discuss anything that has been raised in regard to Modern Slavery or governance.

Our Policies on Modern Slavery

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships

New vendors must agree to and certify compliance with all applicable human rights laws, environmental laws and worker safety laws, including all such laws related to slave labour.

Wavelink will not conduct business with any new vendors who refuse to comply.

Due Diligence Processes for Modern Slavery

As part of our initiative to identify and mitigate risk with respect to suppliers, Wavelink has a process by which we :

- Implemented a CRM portal used to manage our vendor relationships, including our suppliers.
- Perform due diligence, as applicable, on new suppliers as part of Wavelink's supplier pre-qualification process, which includes supplier completion of questionnaires relating to supplier corporate information, performance, and compliance to establish that suppliers adhere to Wavelink's standards, comply with applicable laws and are a suitable supplier.
- Continually identify and assess potential risk areas when considering taking on new suppliers and regularly reviews our existing supply chains and policies to ensure and improve compliance.
- Continually update and improve supply chain management processes to reduce risk.
- Include language in contracts to address compliance with applicable laws, rules and regulations, where appropriate.
- Understand their obligations to speak-up and seek guidance regarding any misconduct or non-compliance by any employee or supplier and the various reporting avenues Wavelink makes available to all of its employees to do so.

Training

Wavelink requires employees to review and certify their compliance with the Code of Conduct upon joining and an accessible copy of this is made available for all employees.

Wavelink also requires all employees to complete our online Modern Slavery Training with a quiz at the end to confirm their understanding. They are also sign off that they agree to report any potential risks to the People & Culture Team.

Next Steps

Wavelink plans to make progress through the following actions:

- Continue consultation with their vendors to address modern slavery risks.
- Undertake additional due diligence on high-risk suppliers.
- Where reasonably practicable, in respect of procurement, ensure contracts with new vendors and contract renewals incorporate modern slavery requirements.
- Review procurement policies and procedures, including tender processes adequately address modern slavery risks.

This statement is made pursuant to the Commonwealth's Modern Slavery Act 2018. In preparing this statement, Wavelink consulted with Infinigate Holding AG and our Vendor's in order to understand the approach taken to supply globally.

This Modern Slavery Statement was approved by Executive Board Director, Ilan Rubin representing the Board of Directors of Wavelink Communications Pty Ltd.

Name _____

Title _____

Signature *Ilan Rubin*

Date _____

This Modern Slavery Statement was approved by the Denis Ferrand-Ajchenbaum, Chief Growth Officer, & Nina Gherzi, General Counsel of Infinigate Holding AG Board.

Name _____ Name _____

Title _____ Title _____

Signature Nina Gherzi Signature Denis Ferrand-Ajchenbaum

Date _____ Date _____