



**Lab**  
**Global**

# INFOMANIAK GROUP SA

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Disclosure Report

Date Submitted: February 24th, 2025



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## Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

**This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company**



# Disclosure Questionnaire

## Industries and Products

	Yes	No
Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Outcomes & Penalties

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



## Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company prohibits freedom of association/collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company workers are prisoners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conduct Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Confirmation of Right to Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does not transparently report corporate financials to government	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employs Individuals on Zero-Hour Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities located in sensitive ecosystems	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ID Cards Withheld or Penalties for Resignation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No formal Registration Under Domestic Regulations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No signed employment contracts for all workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overtime For Hourly Workers Is Compulsory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payslips not provided to show wage calculation and deductions	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<a href="#">Other</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



# Disclosure Questionnaire Statement

## Disclosure Questionnaire Category: Other - Clients in Controversial and Ineligible Industries

<b>Topic</b>	Clients in Controversial and Ineligible Industries
<b>Summary of Issue</b>	<p>INFOMANIAK GROUP SA has clients in the following industries: Pharmaceuticals, Fossil Fuel industries, Gambling, Pornography, Tobacco</p> <p>The types of services/products offered to these clients include:</p> <ul style="list-style-type: none"><li>- Domain names</li><li>- Web hosting services</li></ul>
<b>Size/Scope of Issue</b> (e.g. \$ financial implication, # of individuals affected)	In the last fiscal year, 0.0289% of the company's annual revenue was from clients in fossil fuel, 0.0192% from gambling, 0.13% from pharmaceuticals, 0.0268% from tobacco and 0.0294% from Pornography.
<b>Impact on Stakeholder(s)</b>	<p>Companies that work with clients in controversial industries can directly or indirectly increase the harmful impact to stakeholders by enabling business growth. Therefore, companies that work with clients in these industries should have practices in place to ensure that their impact is aimed at decreasing the negative impacts of the industry.</p> <p>Companies offering certain types of services and products to controversial clients are required to have at minimum a grievance/complaints mechanism and a whistleblower protection policy.</p>
<b>Implemented Management Practices</b>	<p>INFOMANIAK GROUP SA has the following mechanisms in place to manage the risks related to their business relationships with clients in controversial and ineligible industries:</p> <p><b>Grievance/complaints mechanism.</b> This is accessible to the public through the company's website. Infomaniak responds to stakeholder grievances by regularly communicating each step and its result in the solution-finding procedure to the grievance and confirming when the solution to the grievance is found, or explaining why the issue raised was not accepted as a grievance. Among the accepted reports, the company accepts complaints related to (i) spam, phishing or malware, (ii) violence</p>

or hate speech, (iii) harassment, intimidation or threats, (iv) human rights violation, (v) identity theft, copyright /Intellectual Property Infringement, and (vi) illegal activities. Reasons accepting the grievances :

- Violation of laws and regulations : Any act contrary to the laws, regulations or legal obligations in force.
- Fraud and corruption: Any fraudulent practice, corruption or misuse of corporate assets.
- Breach of ethics and company values: Conduct contrary to the ethical principles set out in the internal code of conduct.
- Infringement of fundamental rights: Discrimination, moral or sexual harassment, or any other form of abuse infringing the rights of employees or stakeholders.
- Threat to health and safety: Report of serious risks to the health and safety employees, customers or the public.
- Environmental damage : Non-compliant practices that have a negative impact on the environment.
- Governance failings: Undeclared conflicts of interest, breaches transparency obligations, or any behaviour contrary to good governance practice.
- Data protection and confidentiality: Violation of regulations on the protection of personal data or disclosure of confidential information.

Infomaniak responds to stakeholders' grievances in one of the following ways: By regularly communicating each stage and its outcome in the grievance resolution process and confirming when a solution has been found. Or by explaining why the issue raised was not accepted as a grievance.

The company's commitment to deadlines and follow-up are as follow:

- Acknowledge receipt of reports within 24 hours of their submission.
- Carry out a preliminary assessment within 5 working days to determine whether the report is admissible.
- Conduct an in-depth investigation within a maximum of 30 working days, depending on the nature and complexity of the case.
- Finalise the analysis and implement corrective actions within 60 working days where possible.

**Whistleblower Protection Policy.** The policy includes the following statements:

- The whistleblowing policy is designed to promote a culture of transparency and integrity within the organisation. By encouraging employees, prospects or customers to report wrongdoing and offering them protection, the company can proactively identify and correct problems, improve the

	<p>processes and protect the business and assets. The company is convinced that this policy will help to strengthen the confidence of stakeholders and maintain a positive reputation.</p> <ul style="list-style-type: none"><li>• For whistleblowers, the company has put in place an internal mechanism to report irregularities safely and anonymously, without fear of reprisals.</li><li>• The consequences of identified retaliation may result in negative consequences for the person responsible for the retaliation, such as disciplinary sanctions, legal proceedings, dismissal (in the case of internal retaliation) as well as reporting to the relevant authorities.</li><li>• Information provided by the whistleblower is treated confidentially in order to protect his or her identity.</li><li>• For the whistleblowing system to work, the internal body undertakes to keep the reports strictly secret. The anonymity of the whistleblower is guaranteed within the framework of the law, as is the confidentiality of the information brought to the attention of the internal body. In this context, the internal body protects the whistleblower from any discrimination or reprisals.</li></ul>
<b>Report</b>	<a href="#">Grievance policy link</a>