

Compliance Report 2024

VINCI Energies Switzerland ICT & Automation

(with the companies Actemium Schweiz AG, Axians Schweiz AG, Axians IT Services AG, Axians Amanox AG and SI-TEC GmbH)

1. Introduction

VINCI, as an international group headquartered in France, is subject to a large number of national and international laws, regulations, directives and rules. To ensure compliance with these regulations by the Group, its business units and its employees, VINCI has established its own Code of Conduct, which requires it and all employees within the Group to comply with these regulations and, in addition, with the principles of environmental and social sustainability. These principles set standards for environmental, social and corporate behavior (ESG).

Compliance is of central importance to the management and Board of Directors of the five companies mentioned above, which are part of the VINCI Group and which are grouped together in the VINCI Energies Switzerland ICT & Automation organization. In its relationship with shareholders, employees and business partners, as well as with society as a whole, the management is committed to compliance with ethical, legal, environmental and social standards. It conducts its business in accordance with these standards, serves as a role model for all employees and assists in compliance and continuous improvement of the relevant processes. It has communicated the principles of conduct to employees by means of a compliance guideline created specifically for the Swiss companies, obliging employees to comply with these regulations and also drawing their attention to the consequences in the event of a breach.

2. Structure of the compliance organization

Based on the VINCI Group's compliance management system, the compliance organization of the above-mentioned VINCI Energies companies in Switzerland consists of the compliance correspondent, appointed by Swiss management and reporting to the chief compliance officer of the VINCI Energies Europe East division. The Compliance Correspondent is responsible for strengthening the compliance culture in the organization on a sustainable basis, is the first point of contact for questions from the operating units relating to compliance, operates the anti-corruption management system, which includes the annual screening of business partners, ensures correct reporting on compliance issues in the form of a self-assessment to the VINCI Group and works on the continuous updating and development of the compliance system.

3. Whistleblowing System

As part of its compliance management system, VINCI has set up its own independent whistleblowing system, which is available on its own website at www.vinci-integrity-com, and which allows any employee, business partner or third party to report actual or suspected breaches of the above principles on a confidential basis. This also applies expressly to Switzerland. VINCI's Executive Committee and, in the same way, its management in Switzerland have given an explicit assurance that the use of this whistleblowing system should not be detrimental to anyone who has made a report of an actual or suspected breach of compliance in good faith. This system is available in the national languages German and French as well as in English, Portuguese and Spanish, making it easily accessible to everyone without any major barriers.

4. Key risk areas

As part of the implementation of risk management, the VINCI Group uses the VICTOR tool at company level and the VINCI Energies division uses the Internal Control tool at business unit level to conduct a self-assessment with the aim of classifying the organization in terms of its maturity regarding the implementation of internal Group directives and regulations. The resulting action plans are processed on an ongoing basis. A year-end summary report for the attention of the Group Executive Board provides information on resources in the risk area, internal and external audits carried out and planned, project-based risk reviews as well as outstanding action plans and steps taken to minimize risks.

5. Compliance incidents

In the 2024 financial year, no information was reported via the aforementioned whistleblower system. Information on any violations of the Code of Conduct can be reported to the Compliance Correspondent or via the above-mentioned whistleblowing system.

6. Screening of the business partners

The French law no.2016-1691 "Sapin II" requires French companies and their divisions operating outside France to establish a fixed system to prevent corruption and influence peddling. As part of this compliance management system, it is necessary and also mandatory for our organization in Switzerland to conduct a risk assessment of our business partners. This business partner screening was introduced in 2020 and repeated in subsequent years. Each year, each business unit's top 10 customers, top 10 suppliers and top 5 subcontractors are screened on the basis of questions relating to corruption and human rights risks (the latter according to Global Human Rights Risk Mapping 2024 only countries with high or very high risk). As part of this business partner screening, the business partners have thus been subjected to a well-founded inventory and analysis regarding compliance risks. No indications of questionable behavior with regard to compliance were found among the checked business partners.

7. Due diligence and reporting obligations

The Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO) requires companies to prepare a report pursuant to Art. 17 DDTrO or exempt them from doing so.

Each of the above-mentioned companies has undergone an assessment, which is reviewed by the auditing company PwC. None of them import minerals or metals, nor do they process or treat them. There is no suspicion of child labour for products in the supply chain that originate from countries listed as "enhanced" in the UNICEF Children's Rights in the Workplace Index.

All processes are updated and trained regarding the Data Protection Act. No data security breaches have been reported in accordance with Art. 24 FADP.

8. Raising employee awareness of compliance risks

The practical effectiveness of a compliance organization depends above all on creating awareness of critical issues in the working environment. Appropriate communication is therefore crucial for the success of the compliance organization. Information on compliance issues can be provided through internal Group media, and training can be provided through the internal Group e-learning program or in the monthly toolbox meetings. For employees and new hires in corresponding job categories and with defined functions, a maximum of 5 tasks are required in the VINCI ComEth application: Approval of the *VINCI Code of ethics and conduct* as well as the *VINCI Anti-Corruption Code of Conduct* and completion of the three e-learning *Anti-Corruption*, *Conflicts of Interest* and *Competition law*. In 2024, the focus was on an approval and completion rate close to 100%. Two further e-learning were also requested for completion: *Cybersecurity Passport* and *Human Rights*. In addition, training was provided on the new gifts policy that has been integrated into our compliance policy.

9. Measures for the further development of the compliance management system

The existing training app will be used to provide employees with targeted training on compliance topics regardless of location and time.

As part of a comprehensive risk and compliance management system, the business continuity management system was expanded to include risk assessment, business impact analysis and the business continuity plan in relation to internal IT. Further scenarios will follow.

Schlieren, 14th of July 2025



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