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# Grievance Mechanism & Whistleblower Policy

## Camptocamp SA

Version 1.2 - September 2026

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# Document Versions

| VERSION | OWNER | CHANGE DATE | CHANGES SUMMARY |
|---|---|---|---|
| 1.2 | Human Resources and CSR | September 1, 2026 | The HR team is now responsible for conducting a formal investigation whenever retaliatory actions against a whistleblower are identified. |
| 1.1 | Human Resources and CSR | July 9, 2026 | More information about the grievance mechanism and procedure |
| 1.0 | Human Resources and CSR | June 16, 2026 | Document creation |

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# 1 Introduction & Objectives

## 1.1 Statement of Commitment

Camptocamp SA is dedicated to maintaining the highest standards of ethics, integrity, and transparency in all its business operations. We believe that fostering a culture of openness is essential to preventing misconduct and ensuring the long-term success of our organization. This policy underscores our commitment to providing a safe and confidential environment where individuals feel empowered to "Speak Up" without fear of reprisal.

## 1.2 Purpose of the Policy

The primary objective of this document is to establish a formal framework for identifying, reporting, and addressing concerns related to serious misconduct or unethical behavior. This includes, but is not limited to:

- Fraud, corruption, or theft.
- Violations of laws or internal policies.
- Harassment, discrimination, or other breaches of our Code of Ethics.
- Accounting irregularities and conflicts of interest.

By providing clear reporting channels and protective measures, we aim to mitigate risks and continuously improve our corporate social responsibility standards.

## 1.3 Scope of Application

This policy applies to all stakeholders associated with Camptocamp SA. This includes:

- **Internal Stakeholders**: All employees across our offices in Switzerland, France, Germany, and working remotely.
- **External Stakeholders**: Clients, partners, suppliers, and any other third parties impacted by our operations.

## 1.4 Core Principles

- **Confidentiality**: All reports are handled with the strictest confidence by an independent unit.
- **Non-Retaliation**: We provide a formal guarantee that no person will be penalized, dismissed, or subjected to any form of discrimination for filing a report in good faith.
- **Accessibility**: Multiple secure channels are provided to ensure that everyone can raise concerns easily and safely.

# 2 Grievance & Complaints Mechanism

## 2.1 Information to Internal and External Stakeholders

A dedicated grievance / whistleblowing page is publicly available on our corporate website at https://camptocamp.com/whistleblower providing:

- An overview of the grievance mechanism with a link to the current document for further details and information.
- A link to the Online Reporting System made available by Swisscom, Camptocamp's parent company.

## 2.2 Grounds for Accepting a Grievance

A grievance is accepted if it pertains to serious misconduct or breaches of our principles, including but not limited to:

- Fraud, corruption, or theft.
- Harassment, discrimination, or unethical behavior.
- Violations of data protection and data privacy regulations.
- Violations of laws or internal policies, such as the Code of Ethics.
- Conflicts of interest and accounting irregularities.
- Anti-competitive practices.

## 2.3 Personal Scope

Notifications may be made by natural persons according to Article 4 of EU-Directive 2019/1937, e.g. employees, consultants, shareholders, self-employed persons, professionals, volunteers and trainees - whether paid or unpaid - and persons with administrative, managerial, supervisory, control or representative functions, even if these functions are exercised on a de facto basis.

Whistleblower protection also applies:

- when the legal relationship (e.g., employee relationship, collaboration, consulting, supply relationship etc.) has not yet begun, if information about violations was acquired during the selection process or the pre-contractual stage,
- during the trial period,
- after the termination of the legal relationship if the information on violations was acquired during the course of the relationship.

## 2.4 Communication Channels

Camptocamp SA expects that a climate of mutual respect of dignity, honour and reputation is promoted by its whole staff and partners. Thus, employees are encouraged to share their concerns under this policy directly with their manager (if appropriate) or with the Head of the applicable department or with the Human Resources department.

If the employee or partner is uncomfortable to report through one of these channels, they may escalate the notification to Swisscom Group Internal Audit through one of the following standard communication channels:

- By mail: Swisscom AG, Group Internal Audit, Postfach 3050 Bern, Switzerland.
- By completing a reporting format in the Online Reporting System ("ORS", based on the EQS Integrity Line solution), available in English, French, German and Italian.
- By voicemail provided by the ORS.
- By direct contact: It is within the whistleblower's rights to request a face-to-face interview with one or more members of Group Internal Audit.
- The email internal.audit@swisscom.com also remains available for notifications for which the whistleblower does not request the protections provided by this policy.

If the notification is received by mail, the person in Group Internal Audit receiving the notification must promptly enter the letter as a case into ORS.

If the notification is made by phone/voicemail the information is automatically transferred as a case to the ORS system.

If the notification is made in direct contact, the person in Group Internal Audit receiving the notification must, with the whistleblower's consent, promptly produce a written transcript of the discussion and enter it as a case into ORS.

During the reporting process in ORS, the whistleblower has the option to select the specific entity they believe to be pertinent to the concern being reported.

Alternatively, Swiss employees have the additional option of contacting by email or phone an **External Person of Trust** as described in the Human Resources pages in our intranet. Camptocamp SA covers the cost for up to 3 hours but is not informed of the identity of the caller.

This service is so far only available in Switzerland but options to extend it to all employees are currently being considered by the Human Resources and CSR team.

## 2.5 Confidentiality & Protection of Individuals

The Online Reporting System (ORS) is certified and operated in a secure manner to prevent access to information by unauthorized persons and to ensure that the identity of the reporter and other persons involved in the audit remains confidential.

To simplify the handling of the notification, the whistleblower may include their contact information (non-mandatory information). The reporting form can nevertheless be submitted anonymously. The whistleblower can optionally set up a dedicated and secured inbox for correspondence, maintaining anonymity.

During the audit procedures, in particular when making enquiries with third parties,

- **The need-to-know principle is observed**: the identity of the whistleblower, the persons involved, the facts mentioned in the notification may not be disclosed to persons other than those internal or external persons responsible for receiving or following up on the notifications without the latter's prior expressed consent.
- **The audit of the facts is limited to what is necessary** for the examination of an initial suspicion and its legal assessment, in particular the collection and processing of personal data is limited to the minimum necessary. Personal data that is clearly not useful for the processing of a specific clarifying report, where possible, is not collected or, if collected accidentally, is deleted immediately.
- **The interests of the person(s) concerned worthy of protection are safeguarded**, in particular that a preliminary conviction of the person(s) concerned by colleagues or superiors is avoided.
- **The whistleblower is protected** (in particular no disclosure of their identity).

In order not to jeopardise the success of the audit, and to the extent permitted by data protection law, the subject of the audit is not informed of an audit conducted against them.

## 2.6 Resolution Facilitation

The resolution process is overseen by Swisscom Group Internal Audit to ensure independence and objectivity. All notifications follow a structured, independent audit process:

1. **Initial Evaluation:** The Head of Group Internal Audit evaluates each notification, categorizing it (Severe, Significant, Minor, or Out-of-scope) to determine if a formal audit is required.
2. **Audit and Investigation:** If sufficient evidence exists, a case manager is assigned and an internal audit is conducted. This investigation may involve collaboration with specialized departments, such as Human Resources or Compliance, to ensure a thorough and legally compliant approach. The Head of Group Internal Audit is informed by the case manager continuously during the audit. If appropriate, the draft Final Evaluation is discussed in a closing meeting with the respective auditees.
3. **Final Evaluation:** The audit concludes with a Final Evaluation - resulting in a finding of (Partially) Confirmed, Not Confirmed, or Inconclusive - typically within 90 days of the acknowledgment of receipt.
4. **Implementation of Corrective Actions:** Should the audit confirm misconduct, the company will implement appropriate disciplinary or corrective measures in accordance with internal staff regulations and applicable laws. Furthermore, if systemic issues are identified, the Head of Group Internal Audit will notify relevant internal departments to drive process, control, and IT-system improvements.

## 2.7 Process Timeline & Feedback

In case contact details are shared by the whistleblower, the case manager ensures that the whistleblower receives a confirmation of the notification's receipt within seven days. Feedback will be provided within 90 days after the acknowledgment of receipt is sent to the whistleblower. During the audit it is the responsibility of the case manager to maintain contact with the whistleblower (e.g. request for additional information).

In case the audit is exceeding the stipulated timeframe of 90 days, the whistleblower is informed regarding the delay.

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| **Receipt** | The report is formally received through the secure system. |
| **Acknowledgment** | An acknowledgment of receipt is sent to the whistleblower within **7 days**. |
| **Review and Investigation** | Group Internal Audit processes the report and may involve specialized departments if necessary.<br>During the audit it is the responsibility of the case manager to maintain contact with the whistleblower (e.g. request for additional information). |
| **Resolution & Feedback** | Feedback regarding the outcome or rationale for the decision is provided within **90 days** of the acknowledgment. |

The preferred method of communication is the inbox system, which the whistleblower can activate when submitting a report via the online reporting system. If no inbox has been set up, the case manager will use any other available means of communication based on the contact details provided by the whistleblower (email address, telephone number, postal address).

## 2.8 Responsibilities

- **Confidentiality**: All persons involved in the audit process are under a duty to respect the confidentiality of the audit.
- **Objectivity**: All persons involved in the audit process must remain neutral.
- **Independence**: Potential conflicts of interests must be reported immediately to the Head of Internal Audit and the person concerned must be withdrawn from the audit team and excluded from access to all information concerning the case.
- **Professionalism**: All steps of the audit must be conducted efficiently, thoroughly and in compliance with the applicable laws.
- **Non-retaliation**: No retaliatory action will be taken against the whistleblower if the alert was raised in good faith. In any case where retaliation has occurred (e.g., harassment, victimization), disciplinary sanctions may be taken against the instigator of the retaliation. See next section for further information.

# 3 Whistleblower Protection Policy

## 3.1 Non-Retaliation Commitment

Camptocamp SA provides a formal and unconditional guarantee that no individual - whether an employee or an external partner - will be penalized, dismissed, or subjected to any form of disciplinary or discriminatory action for filing a report or providing testimony in good faith. This protection against retaliation is a cornerstone of our corporate ethics and applies even if the reported concerns are subsequently found to be unsubstantiated, provided the report was made with honest intent.

## 3.2 Confidentiality and Anonymity Measures

To ensure the safety of those who speak up, we have implemented rigorous technical and organizational measures:

- **Anonymous Reporting**: Stakeholders have the option to submit reports anonymously through the Online Reporting System.
- **Secure Communication**: Whistleblowers can create a secure, encrypted inbox within the reporting platform. This allows for ongoing communication and feedback from the investigation team while guaranteeing that the reporter's identity remains technically impossible to identify.
- **Independent Mediation**: All reports are handled by an independent unit within the Swisscom Group, ensuring that no identifying data is shared with Camptocamp SA management without the reporter's explicit consent.

## 3.3 Consequences of Retaliation

Any act of retaliation against a whistleblower is considered a serious breach of our Code of Ethics and will not be tolerated. If retaliation is identified:

- The Human Resources team will conduct a formal investigation.
- In the event that a retaliation report involves the Human Resources team, or if they are otherwise conflicted, the report shall be immediately escalated to Swisscom Group Internal Audit. In such cases, the investigation will be conducted by this independent party to ensure complete objectivity and impartiality.
- Appropriate sanctions and disciplinary measures will be taken against the perpetrator, as defined in the relevant country-specific staff regulations (e.g., Section 6.2 of the Swiss staff regulation).

# 4 Governance & Resources

## 4.1 Roles & Responsibilities

- **Camptocamp SA Human Resources & CSR team**: Responsible for updating the policy, ensuring its dissemination to all stakeholders, and promoting internal awareness.
- **Swisscom Group Internal Audit**: Acts as the neutral and independent unit responsible for receiving, processing, and investigating reports to ensure impartial resolution.

## 4.2 Local Resources & Support

- **External Person of Trust** (Switzerland): Employees based in Switzerland have the option to freely contact an external person of trust for confidential advice or to report a situation.
- **Access to Reference Documents**: Specific details regarding various grievance and whistleblowing topics are available on our intranet and corporate website. For instance:
  - General principles that Camptocamp intends to uphold in our Code of Ethics
  - Guidelines and expectations, sanctions and procedures in the staff regulations for each country (Switzerland, France, and Germany).
  - Documentation about our grievance procedure and whistleblower protection policy, as described in this document.
  - Detailed procedure to contact the external person of trust in Switzerland.

Founder & Managing Partner
2 Sep 2026
Advanced electronic signature

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