Speak-up Policy

How to report wrongdoing, and how we protect you.

VERSION 2 17 NOVEMBER 2026 ENGLISH PUBLIC

01 Why speak up

We want to hear about wrongdoing early, so that we can stop it. This policy explains what you can report, how to do it, what happens next and how we protect you.

In this document, “AVVI”, “we” and “us” mean the company named in the imprint on avvi.ch/legal and the companies in its group.

02 Who can report

Anyone: people who work or worked for AVVI, contractors, suppliers and their staff, customers, partners and members of the public.

03 What to report

Anything you reasonably believe is wrong, for example:

- a breach of the law, of our Code of Conduct (AVVI-POL-001) or of our policies;
- a breach of export control or sanctions law;
- bribery, fraud or a conflict of interest;
- a way to bypass the human approval in our products, or a danger to people from one of them;
- a security weakness or a data breach (security weaknesses in our products can also be reported under AVVI-POL-006);
- harassment, discrimination or unsafe working conditions;
- forced labour or other abuse in our supply chain;
- any attempt to hide one of these, or to punish someone for reporting one.

You do not need proof. A reasonable belief is enough.

04 How to report

Tell your manager or a member of Management, or write to us through the contact form at avvi.ch/contact and choose “Legal & compliance”. Mark your message “Speak up” if you want it handled under this policy.

If you want to stay anonymous, you may write from an email address that does not identify you; we can then still answer you. We will not try to find out who you are.

You may also report to a competent authority. Where the law gives you that right, using our channel first is your choice, not a duty.

05 What happens next

- We confirm that we received your report within 7 days.
- A person who is independent of the matter and has no conflict looks into it.
- We tell you what we did or plan to do within 3 months, as far as we can without harming the investigation or the rights of others.
- Where wrongdoing is found, we stop it, put it right and take action against those responsible.

06 Confidentiality

We keep your identity, and the identity of anyone named in a report, confidential. We share it only with the people who must know it to handle the report, or where the law requires it, and then we tell you first unless the law forbids it.

07 No retaliation

Nobody may be dismissed, demoted, threatened, harmed or treated worse for making a report in good faith, or for helping with an investigation, even if the report turns out to be wrong. Retaliation is itself a serious breach of our Code of Conduct.

Knowingly false reports are not protected.

08 Records

We keep a record of each report and what we did. We keep the personal data in it only as long as we need it to handle the report and any proceedings that follow, and then delete it.

09 Ownership

Management owns this policy and reviews it every year.

Version 2 replaces version 1 of 1 November 2026. AVVI now makes software only; the parts about our own interceptor are removed.

The current version of this document is published at avvi.ch/docs/avvi-speak-up-policy.pdf. If you have a question about it, write to us through avvi.ch/contact.