

Due diligence obligations in the supply chain (DDTrO)

Information on due diligence obligations and transparency in relation to minerals and metals from conflict-affected areas and child labour (DDTrO), based on Article 964j et seq. of the Swiss Code of Obligations (CO)

With our long-standing commitment to responsible procurement practices, we welcome the introduction of Switzerland's new Supply Chain Act (DDTrO), which set out the due diligence and transparency requirements in relation to minerals and metals from conflict-affected areas and child labour.

In light of the DDTrO, we are providing the following additional information:

Concerning conflict materials

The V-ZUG Group does not procure any minerals or metals in the specified characteristics that would be subject to reporting requirements under the DDTrO. This is reviewed annually by the Procurement department using the customs tariff numbers of the specific materials indicated in the Annex to the DDTrO.

We are therefore not subject to any due diligence or reporting obligations in this regard in accordance with the Swiss Code of Obligations (CO).

Our suppliers are also required by our Code of Conduct for Suppliers to disclose any relevant information on this topic to us using the IntegrityNext self-declaration platform.

Concerning child labour

Due diligence obligations concerning human rights, and child labour in particular, have always been part of supplier management at V-ZUG. Our management approach includes our Code of Conduct for Suppliers (including a reporting point), which forms an integral part of all agreements with our suppliers. We also require our suppliers to complete a self-declaration using

the IntegrityNext platform and conduct regular supplier audits on site. These supplier audits are carried out by V-ZUG employees or one of our partner companies. Further information is provided in our [“Entrepreneurship for sustainable prosperity”](#) focus topic, including key figures and targets related to audits.

Having completed a risk assessment using UNICEF's Children's Rights in the Workplace Index, we can confirm the following results:

According to the information provided by our suppliers on the country of origin, we do not work with any suppliers from critical countries and do not source any materials/modules from critical countries (classification: “Heightened”). We spend 73% of expenditure in materials/modules in countries with only a low level of risk exposure to child labour (classification: “Basic”). We spend the remaining 27% of expenses in countries with an increased risk of child labour (classification: “Enhanced”). We update this risk assessment annually based on our purchasing volume and import data

The reviews carried out as part of the regular on-site audits (“Supplier audit questionnaire” appendix) and the self-declarations (using the IntegrityNext platform) gave us no reason to suspect the use of child labour. We also received no reports via the reporting point during the reporting period (integral part of the Code of Conduct for Suppliers, section 6: Reporting point).