



Annual report 2024

Ethics Group Department

Key facts

Pour
nous tous 

Mission statement

The Ethics Group Department safeguards and protects the interests of the SNCF Group and its employees.

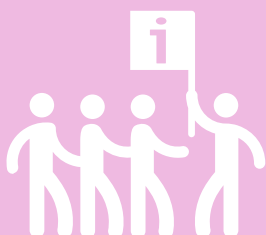
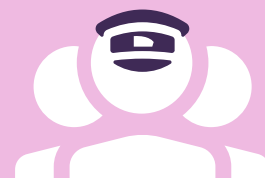


It defines the **Ethics Policy** and implements it through awareness-raising and training initiatives, and by publishing documents and communications on its intranet site and via its digital application, "MyEtic."



It oversees the **ethics whistleblowing system** and **internal investigations**. It organizes training sessions, awareness campaigns, and conferences.

It **steers and coordinates several networks** made up of professionals from the Group's subsidiaries and businesses : a network of nearly 100 Ethics Officers, Whistleblowing system Officers, and AI Ethics Correspondents per Business Group.



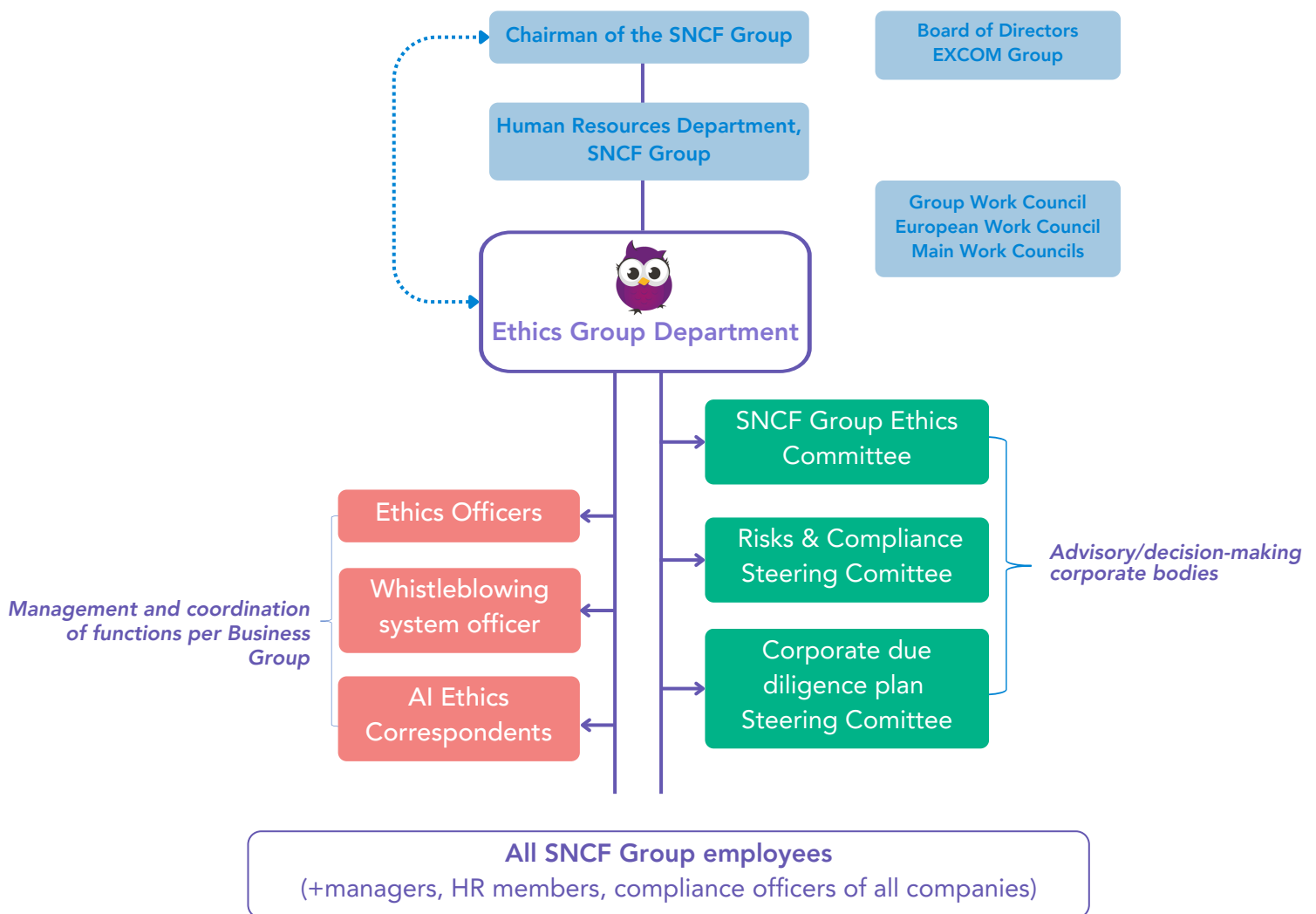
It provides **advice and support** on all ethical issues to Group employees (in particular managers, HR staff, Ethics Officers, etc.).

Governance and Activities

Reporting to the Group Human Resources Department, the Ethics Group Department (EGD) has exclusive and permanent powers delegated by the SNCF Group Chairman, & CEO, to carry out its missions independently and objectively.

The EGD, made up of a team of around ten people, has also interactions with its external counterparts : it shares best practices that reinforce SNCF's values in terms of ethics, thereby positioning it as a benchmark player.

Organizational chart of the SNCF Group Ethics Department within the Holding Company

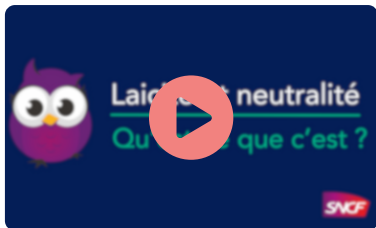


The SNCF Ethics Group Director also performs additional roles.

- Representative towards the French Anti-Corruption Agency appointed by the Chairman of the SNCF Group
- Co-chair of the MEDEF International Compliance and Ethics Committee
- Member of the Ethics Committee of the Railways Transport System

Raising Awareness

The Ethics Group Department has designed and distributed **videos** on ethical topics, including laicity, the Ethics Charter, and highlights from the Ethics Day.



▶ To watch our videos, click here

The EGD has also produced and distributed practical **ethics fact sheets, posters, memos, guides** and brochures to raise awareness among employees.



▶ To view our documents, click here

It has designed a new **Ethics SharePoint** site to provide employees with easy, simple, and quick access to all its tools by ethics topic, in addition to the digital **MyEtic application**.



▶ To go to SharePoint, click here

The EGD also contributes to the design and promotion of various **e-learning courses** on ethical topics.



Focus on Ethics Day 2024

A first event and a strong commitment to ethics within the SNCF Group



Thursday, October 17, 2024, marked the first Ethics Day. Open to all employees, the event generated a very high turnout.

This day will now be held every year with the aim of:

- Reaffirming the importance of ethics at all levels of the group,
- Continuing to develop the company's ethical culture,
- Initiating and continuing discussions about our values and key principles,
- Providing a cross-perspective with internal and external speakers on current issues.

Professionalization

Focus on Ethics Officers



The Ethics Group Department (EGD) continues to grow and facilitate the Ethics Officers Network created in 2012.

In 2024, there are approximately **100 Ethics Officers across the Group**. This number is constantly growing to ensure optimal coverage of our entities and territories!

Ethics Officers are essential local contacts for all our employees. They play an **active role as Ethics ambassadors within their entities and subsidiaries**.

As such, the Ethics Department manages the network through various initiatives:

OPERATIONAL SUPPORT

The EGD is continuing to develop hands-on tools (practical kits containing whistleblowing documents/internal investigations) to help Officers carry out their duties.

DEDICATED SHAREPOINT

The EGD has also created a new SharePoint site dedicated to Ethics Officers to facilitate their communication, awareness-raising, and advisory tasks and, where necessary, the management of whistleblowing reports and involvement in internal investigations.

TRAINING

The EGD has significantly increased the number of training sessions for the benefits of Ethics Officers on whistleblowing reports management and conducting internal investigations.

COOPERATION

The EGD continued its efforts to promote the sharing of achievements and best practices among peers.

The results: Ethics Officers in action!

- ▶ Stronger cooperation among peers, particularly between Business Groups, and in terms of advice support.
- ▶ An upward trend in the number of Officers distributing communication materials and carrying out awareness-raising activities, particularly in the area of human capital (Harassment, discrimination, etc)
- ▶ An increase in the number of advices provided by Officers on almost all topics.

▶ To view the list of Ethics Officers, [click here](#)



Support and Advice

The Ethics Group Department has made new documents and tools available to support and professionalize managers, HR staff, Ethics Officers and Whistleblower system Officers.



Guides “How to handle an ethics whistleblowing report?”

These guides for managers and HR and ethics professionals provide information on the roles and responsibilities of each party. They also provide some basic concepts and guidelines on how to respond when an whistleblowing report is received.



Poster: “What is an ethics whistleblowing report?”

These posters raise awareness and inform all employees about the importance of the ethics whistleblowing system. They also promote a culture of integrity and transparency and clarify the procedures and issues associated with ethics whistleblowing report.



Q&A on the Principles of Laicity and Neutrality

This document provides answers to the operational and specific expectations of managers, HR professionals, and Ethics/Whistleblowing Officers regarding the application of the principles of laicity and neutrality in France, in addition to existing resources (guide, memo, etc.).



Welcome guide for Ethics Officers

This practical guide provides new Officers with a clear and comprehensive framework when they take up their duties. It facilitates integration and understanding of the company's missions, available tools, and ethical values.



The Ethics Whistleblowing Platform

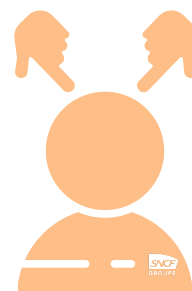
The Ethics Group Department developed and rolled out an “alert management” module on a new platform at the end of 2024.

This platform will be made available to Ethics officers in subsidiaries on an ongoing basis throughout 2025.

Secure and confidential, it will be accessible 24 hours a day in 12 languages, enabling all employees and third parties to report any incidents that violate the law or our Ethics Policy.

This system, accessible online via www.alerteethiquesncf.com, aims to guarantee the confidentiality (and anonymity, if desired) of whistleblowers and the protection of personal data. It is part of a process to prevent and detect risks and ensure respect for human rights.

Keep building trust in the Ethics Whistleblowing Report System



The Ethics Group Department strengthens its **non-retaliation policy**:

- It can be contacted via Whistleblowing Report in the event of retaliatory measures.
- In 2025, a new policy, following presentation to the European Works Council, will provide a unified framework for protecting whistleblowers against the risk of retaliation, regardless of the country in which they work and their employer within the Group.

Results of the 2024 "C'est à Vous" employee survey, based on responses from over 100,000 employees



80%

are familiar with the Group's Ethics Whistleblowing Report system

(+16 points vs. 2023)

compared to 66% according to a benchmark study conducted by Le Cercle d'Éthique des Affaires among other companies in 2024.



83%

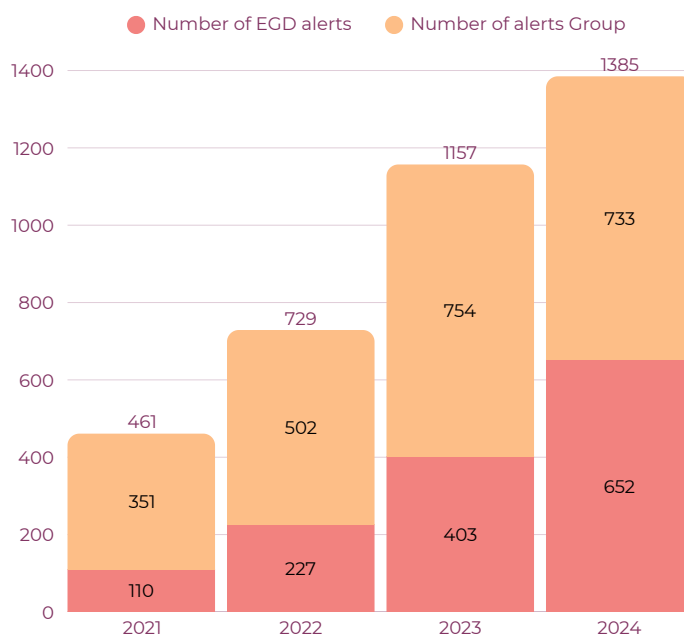
trust the whistleblowing report system SNCF

compared to 61% according to a benchmark study conducted by Le Cercle d'Éthique des Affaires among other companies in 2024.

The number of whistleblowing reports received continues to rise, demonstrating in particular the awareness and trust that employees have in the whistleblowing system.

The SNCF Group received **1 385 alerts in 2024**.

- Of which **652 alerts** before duplicates received by the EGD,
- Of which more than **50% are ethics eligible and sufficiently substantiated for follow-up purposes.**



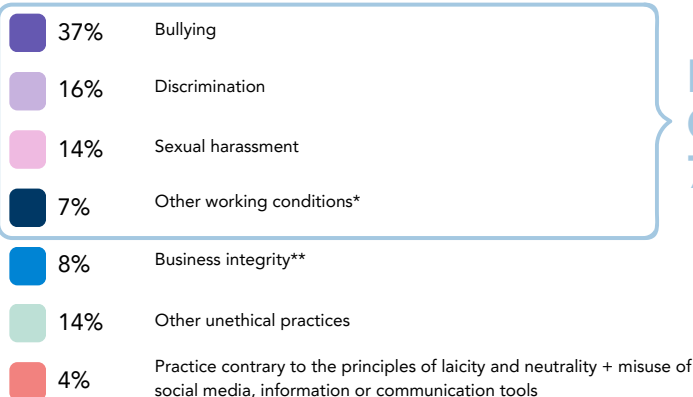
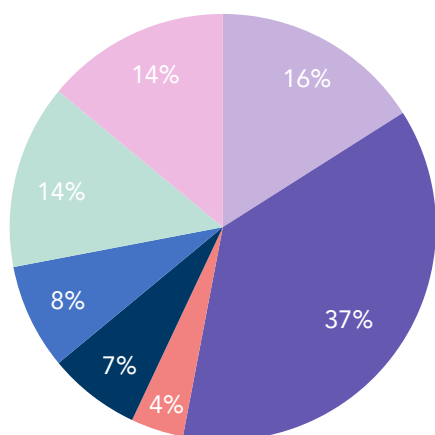
Group Ethics Annual Report



1,385 Group whistleblowing reports received in 2024 via the internal whistleblowing report system (Ethics Group alert platform and local reports to management, HR, and the network of alert/ethics officers).
77% of whistleblowing reports related to ethics and 23% were deemed outside the scope of ethics.

The breakdown of whistleblowing reports in the field of ethics is as follows:

- **74% of alerts** relate to **human capital** (bullying, discrimination, sexual harassment, other working conditions, etc.)
- **Business integrity:** 8% of whistleblowing reports received
- One-third of whistleblowing reports are anonymous
- 6% of whistleblowing reports are made by external parties (service providers, suppliers, customers)



**Human Capital
74%**



Not all whistleblowing reports received are admissible and/or substantiated.

(*) Other working conditions:

- Violation of regulations on health, hygiene, and safety at work
- Violation of rules applicable to personal data protection
- Violation of social standards and labor laws / Illegal or fictitious employment
- Violation of human rights and fundamental freedoms

(**) Business ethics:

- Corruption/influence peddling/conflict of interests
- Misappropriation of assets
- Money laundering/financial fraud
- Falsification of documents with accounting/financial impact
- Anti-competitive policies or disclosure of confidential information



[View the Sustainability Report 2024](#)



[View the Corporate diligence plan](#)

The company has a strict policy against bullying, discrimination, sexual harassment, and sexist behavior, based on prevention, awareness, and handling of reported cases through prevention campaigns, reporting tools, and a 2024 action plan.

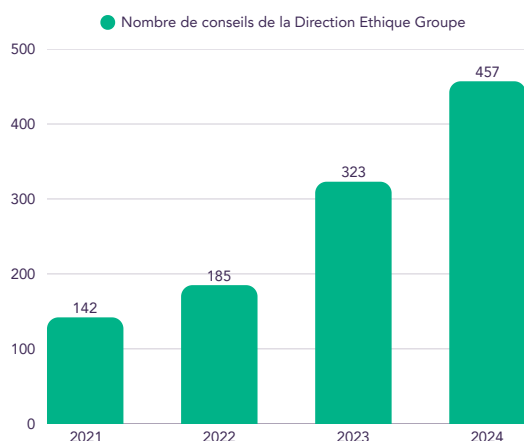
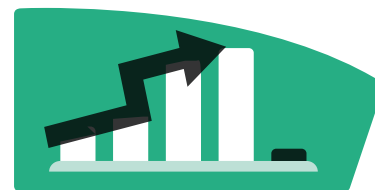
In 2024, there were **50 disciplinary** for sexual harassment procedures (27 in 2023) out of which **27 dismissals or terminations** were decided.

A consolidated annual report on whistleblowing reports is shared with senior management, the board of directors and labor unions in order to monitor trends, strengthen prevention, and raise awareness of ethical issues within the Group.

The EGD organized more than **80 training/awareness-raising** sessions in 2024. This represents approximately 3,700 participants, six weeks devoted solely to awareness-raising/training, and 217 hours of face-to-face training.

Information, Reassurances, and Protection

A year marked by an increase in the number of advices provided by the Ethics Group Department

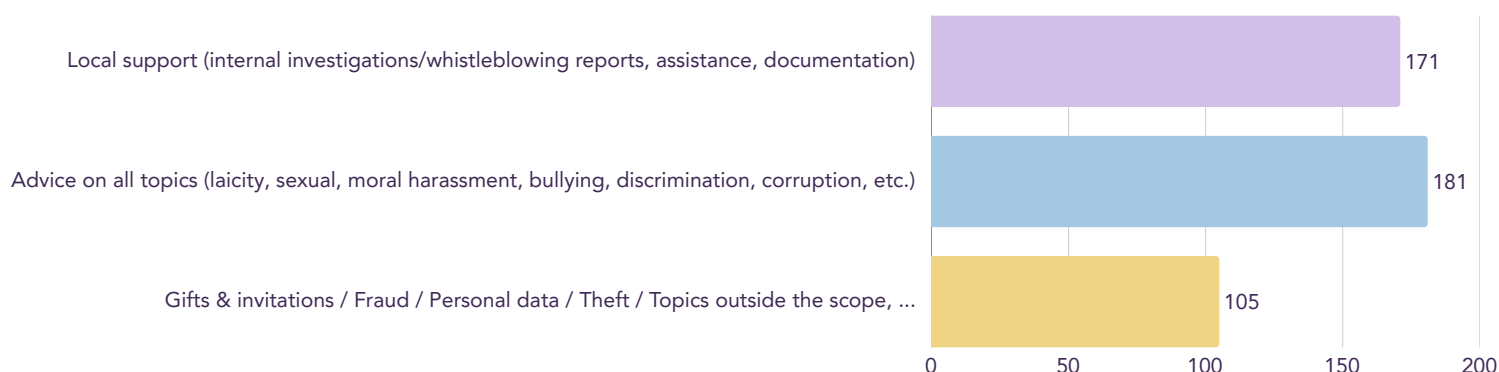


In 2024, the EGD provided **457 advices**, representing an increase of 41% compared to 2023.

In addition to our corporate email ligneethique@sncf.fr, a helpline is also available (+33(0)4 27 01 02 81). The line handled **147 calls providing advice** in 2024.

35% of advices are in support of Business groups with consultations and guidance on internal investigations (and post-investigations). Support requests also concern whistleblowing reporting and require a significant amount of time spent on support/assistance.

Breakdown of advice provided by the Ethics Group Department by topic



Using Artificial Intelligence In Your Daily Work

2024, a turning point for AI Ethics:

- Adoption of the European regulation on artificial intelligence ("AI Act").
- Establishment of co-steering on AI ethics (Ethics Group Department/Digital Group Department):



Set-up of a network of AI ethics correspondents per Business Group, trained and led by the EGD, to map AI systems and assess the most high-risk projects within each Business Group.



The ambition to gradually build an organization so that the most risky AI projects are designed ethically, in accordance with the requirements of the AI ACT.



Participation in several digital committees. The Ethics Group Director is a member of the ad hoc committee on generative AI.



Establishment of an AI office with the Group Digital Department (Digital Security Department), the Group DPO and the ethics AI Officer of the EGD, to identify the projects most at risk within the SNCF Holding and make recommendations.

The EGD produced two key documents in 2024:



Visual generated with AI

- The **AI Ethics Code of Conduct** governs the responsible development, deployment, and use of Artificial Intelligence by SNCF Group employees, as well as by its service providers, suppliers, and subcontractors.

[To view the code of conduct, click here](#)

- The **guidelines for the ethical use of generative artificial intelligence** establish guidelines for all Group employees, enabling ethical use that respects human rights and fundamental freedoms.

[To view the guidelines, click here](#)



How to submit a whistleblowing report ?



Contact your manager, HR,
or Ethics Officer



Online, on the platform
www.alerteethiquesncf.com



By post
SNCF Ethics Group Department
2, place aux Étoiles CS 70 001
93633 La Plaine Saint-Denis CEDEX



Using the MyEtic digital
app in the Alert section



Scan or click here to go
to the [Ethics SharePoint](#)

SNCF - DIRECTION DE L'ÉTHIQUE GROUPE

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