

The Philips logo, consisting of the word "PHILIPS" in a bold, blue, sans-serif font, is positioned in the upper left corner of the page. It is set against a white background that is part of a larger graphic element with a blue curved bottom edge.

Policy

# GBP Reporting Policy

## August 2014

### Introduction

Philips is committed to ensuring the highest standards of business conduct and has incorporated this commitment in its General Business Principles and underlying policies (jointly referred to as the 'GBP').

There may, however, be situations in which people do not uphold the standards of business conduct defined in the GBP. This policy describes what you should do if you suspect or observe such behavior.

### Reporting channels

You are urged to report to your GBP Compliance Officer or the [Philips Ethics Line](#) any concerns relating to the application of the GBP which you are unable to resolve with your management or which constitute a direct threat to corporate integrity ('Complaints').

You will find the contact details of the respective GBP Compliance Officer on the Philips intranet ([pww.ethics.philips.com](http://pww.ethics.philips.com)). Complaints can be submitted to the GBP Compliance Officer directly in person, or by phone, e-mail or regular mail.

The [Philips Ethics Line](#) is a toll-free telephone line and internet portal that is available to all employees 24 hours a day / 7 days a week / 365 days a year. Complaints can be submitted via the [Philips Ethics Line](#) on an anonymous basis, insofar as this is permitted by local law, although anonymity can make a comprehensive assessment of the complaint more difficult. For further information, please refer to the Compliance & Reporting section at [pww.ethics.philips.com](http://pww.ethics.philips.com).

If you do not have access to a GBP Compliance Officer or to the [Philips Ethics Line](#), you can submit a complaint to the Secretary of the GBP Review Committee (Amstelplein 2, HBT-16, 1096 BC Amsterdam, The Netherlands).

If the complaint concerns the Chairman of the GBP Review Committee or members of the Executive Committee, you can submit your complaint to the Chairman of the Supervisory Board (Amstelplein 2, HBT-15, 1096 BC Amsterdam, The Netherlands).

This GBP Reporting Policy is intended to supplement more specific (local) grievance or complaint procedures, for example by offering the option to involve an ombudsperson in the case of harassment. If you wish to raise an issue for which there is a more specific procedure or grievance channel available, you are encouraged to use that procedure/channel, e.g. the applicable Human Resources procedures for employment issues.

### **Content of the complaint**

You are expected to disclose all relevant information known to you in order to assist Philips in its response to, or investigation of, a complaint and to allow a proper assessment of the nature, extent and urgency of the matter.

### **Reporting procedure**

Any complaint you wish to make must be submitted internally in line with this GBP Reporting Policy in order to allow Philips to take any appropriate corrective action that may be necessary in order to limit as far as possible any potential impact on Philips.

### **Investigation**

When a complaint is registered, a GBP Compliance Officer (or other person assigned by the GBP Review Committee) will arrange for the complaint to be investigated or for it to be redirected to the appropriate grievance channels. The investigation will be conducted in a manner that is fair and responsible with respect to all parties involved. The GBP Review Committee has oversight responsibility for ensuring that the complaint is investigated in an independent, impartial and unbiased manner, focusing on fact-finding with due observance of national and international legislation and any applicable regulations. Each employee involved in an investigation is expected to cooperate with the assigned investigator(s). If an employee withholds relevant information, this constitutes a breach of duty between the respective employee and Philips. For further information about the investigation, refer to the Philips Investigation manual.

Within a maximum period of two months after registration of the complaint, the GBP Compliance Officer will inform you of the outcome of the investigation. If you submitted a complaint to the Philips Ethics Line you can contact the Ethics Line two months after the reporting date, using the ID number given to you. If an investigation is commenced and not completed within two months you will be informed of the expected date of completion. If you are not satisfied with the manner in which the complaint is being handled, or if you have reasonable grounds to fear that the reporting of an alleged breach will lead to repercussions, you can inform the Secretary of the GBP Review Committee of this in writing (Amstelplein 2, HBT-16, 1096 BC Amsterdam, The Netherlands).

## **Confidentiality**

Information relating to the alleged breach, including your identity or the identity of other persons involved in an inquiry or investigation, shall only be disclosed to those functions within the Philips Group (i.e. the investigator(s), the respective GBP Compliance Officer(s) and members of Group Internal Audit as well as the Group Legal Department) or outside Philips (e.g. forensic auditors and legal counsel) who require this information in order to ensure compliance with this GBP Reporting Policy and legal or regulatory obligations, or as input for subsequent judicial proceedings. Philips employees who participate in an investigation must keep the matter confidential.

## **No reprisals**

Philips shall not dismiss, demote, suspend, threaten, harass or in any manner retaliate against an employee on account of his/her having made a complaint in good faith, having disclosed information relating to a complaint as part of an investigation, or having participated in some other way in an investigation relating to a complaint. Reprisals are considered a serious violation of this policy and appropriate action will be taken to prevent further damage to the employee in question and to discipline those responsible for the reprisals. An employee's right to protection from retaliation does not give them immunity in respect of any complicity in the matters that are the subject of the complaint or an ensuing investigation or judicial proceedings. Any abuse of this GBP Reporting Policy, such as the submission of a complaint which is later proven to have been made maliciously or which was known to be false, will result in disciplinary or legal action (including termination of employment) being taken against the employee who has abused this GBP Reporting Policy.

