



## Philips SpeakUp Policy

April 2026

### Purpose and scope

At Philips, we ensure the highest standards of business conduct. We do this by sustaining a culture in which all employees and business partners show ethical conduct, and where doing things ethically is recognized and valued. This is our commitment, and we have incorporated it in our [General Business Principles](#) and its underlying policies (jointly referred to as the 'GBP'). In line with global whistleblower regulations, this policy sets out the framework that applies when suspecting or observing behavior that is not in line with the GBP.

**Purpose:** This policy describes what you should do if you suspect or observe behavior that is not in line with our GBP. It is intended to help you through the process of reporting a concern, from filing a report through to the resolution of the concern.

**Scope:** This policy applies to all employees and external third parties.

### Any potential violation of our GBP should be reported

You are urged to report any potential violation of the GBP or any other concern that may constitute a direct threat to Philips corporate integrity ('concern').

Examples of such topics include theft, conflict of interest, corruption and bribery, violation of competition law, sexual harassment, and violation of human rights and environmental laws. This list is not exhaustive. If you are unsure if your concern is a potential violation of the GBP, you can consult the [General Business Principles](#) or 'Ask a question' on Philips [SpeakUp](#) ('Ethics Line'). Philips employees can also contact the local [GBP Compliance Officer](#).

In order to allow Philips to take any appropriate corrective action that might be necessary, any concern you wish to make must be submitted in line with this policy. However, nothing in this policy is intended to prevent you from contacting or cooperating with any legal authority in line with locally applicable rules and regulations.

Reporting can be done in different ways. Philips employees and third parties can report concerns online or via phone through Philips [SpeakUp](#). Philips employees can also report concerns to the [GBP Compliance Officer](#).

### Philips SpeakUp

Philips [SpeakUp](#) is a toll-free telephone line and/or internet portal that is available for everybody within and outside of Philips 24 hours a day / 7 days a week / 365 days a year. Philips SpeakUp provides a secure and confidential reporting environment with strict access controls limited to authorized people. Concerns can be submitted via Philips [SpeakUp](#) on an anonymous basis.<sup>1</sup> Do note that a comprehensive assessment of the concern might be more difficult when a concern is filed anonymously. After filing a concern via Philips [SpeakUp](#) you receive a Report Key and a password with which you can access your report in the future.

### GBP Compliance Officer

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<sup>1</sup> Insofar as this is permitted by local law.

Philips employees can submit concerns to the [GBP Compliance Officer](#) directly in person, or by phone, e-mail or regular mail.

### **Alternative channels**

If you do not have access to a GBP Compliance Officer or to Philips [SpeakUp](#), you can submit a concern via regular mail to the GBP Program Office (Prinses Irenestraat 59, 1<sup>st</sup> floor, 1077 WV Amsterdam, The Netherlands), via [integrity@philips.com](mailto:integrity@philips.com). If the concern is about members of the Executive Committee and you do not wish to report your concern via the methods mentioned above, you can also submit your concern via regular mail to the Chairman of the Supervisory Board (Prinses Irenestraat 59, 1<sup>st</sup> floor, 1077 WV Amsterdam, The Netherlands).

Some countries might have local grievance or reporting procedures in place, for example an ombudsperson or specific HR procedures to report Human Resources-related grievances. If you wish to raise an issue for which a more suitable procedure or grievance channel is available, you are encouraged to do so. You can check with the local [GBP Compliance Officer](#) on which alternative channels are available in your country.

### **Providing detailed information**

When filing a report via Philips [SpeakUp](#) or a [GBP Compliance Officer](#), you will be presented with a number of questions relating to your concern. This will include questions about what happened, when and where, and who was involved. For Philips to be able to properly respond to or investigate a concern, you are expected to disclose all relevant information known to you. If you have any documentary evidence of the concern, you are asked to share that too.

### **We follow up on every concern raised**

#### **Case Triage**

Philips will review each concern reported to assess if it represents a potential violation of the GBP or otherwise poses a risk to the corporate integrity of Philips. When a concern falls outside this scope, the reporter will be guided toward the channel or forum best placed to address the situation. This may include dedicated reporting channels or support from their manager.

Examples of concerns that do not relate to the GBP include HR grievances, such as concerns related to interpersonal conflicts between employees, performance and productivity, PPM disputes, and disagreements with legitimate management decisions.

#### **Follow up**

Concerns that involve conduct that may potentially violate the GBP or pose a risk to the corporate integrity of Philips are handled through a formal GBP investigation or Alternative Dispute Resolution (“ADR”).

#### **Investigation**

GBP investigations are conducted under the supervision of the GBP Program Office and performed in line with our internal Investigation Standards and Procedures. This guarantees that the investigation is conducted in a fair manner and responsibly with respect to all parties involved. The GBP Program Office is responsible for overseeing that the investigation:

- guarantees independence, impartiality, the presumption of innocence and unbiasedness towards all parties involved;
- focuses on fact-finding; and
- is conducted with due observance of national and international legislation and any applicable regulations.

If you submitted a concern to Philips [SpeakUp](#), you can consult your report in the Philips [SpeakUp](#) portal. The GBP Compliance Officer, or the assigned investigator, will, in principle, inform the reporter and other relevant person(s) of the outcome of the investigation, and any corrective action that is to be taken. For privacy reasons, no specifics can be shared with the reporter concerning actions taken against the person(s) involved.

It is important that the concern is investigated in a timely manner. At the same time, a thorough investigation in line with our internal Investigation Standards and Procedures can take time. We will work diligently to complete the investigation of your concern as soon as possible.

Several factors can influence how long an investigation will take. These include the nature of the concern, the complexity of the investigation, the volume of other concerns being investigated at that time and the availability of investigators. In any case, after an immediate reply to inform you that your concern has been received, and potential follow up to gain further information from you, we aim to give you an update on the status of the investigation two months after the concern was submitted.

### **Alternative Dispute Resolution**

Available for HR-related concerns, ADR offers reporters a supportive path to follow-up on the concern without the need for a formal GBP investigation. It is applied to concerns for which a GBP investigation is not the best suited method to resolve the concern raised.

ADR can take different forms, such as mediation facilitated by the People Function or involvement from the relevant line manager. The goal is to provide timely closure and ensure the reporter receives the follow-up they need.

The GBP Compliance Officer, or someone assigned by the GBP Program Office, will inform you in a timely manner if your concern will be addressed through ADR and what the next steps will be.

### **Duty of cooperation**

Philips employees involved in the follow-up of concerns (whether through investigation or ADR), regardless of being a witness, reporter or the subject, are required to cooperate with the investigation or ADR.

In the case of an investigation, this means that Philips expects all those involved to share all relevant information that could assist the investigation. Those involved in an investigation will be requested to cooperate and will receive due notice of this request. Withholding this constitutes a breach of your duty as an employee of Philips.

### **We have safeguards in place to ensure due process**

#### **Confidentiality**

Any information about the reported concern, including the identity of those involved in an investigation, shall only be disclosed on a need-to-know basis. Parties that are generally involved ('authorized persons') are the investigator(s) and GBP Compliance Officer(s) appointed to the report, and specific members of Group Legal. This can also mean forensic auditors and legal counsel outside Philips and government authorities or courts who require this information to ensure compliance with this policy and legal or regulatory obligations. Anyone, including you, with information on a case must keep the matter confidential to the extent not otherwise allowed by local law.

In addition to the above stated confidentiality, Philips SpeakUp process adheres to the Philips Privacy Rules.

#### **Non-retaliation**

If you report a concern in good faith, disclose information as part of an investigation or in other way have participated in an investigation, Philips shall not dismiss, demote, suspend, threaten, harass or in any manner (attempt to) retaliate against you for doing so. 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 automatically give them immunity in respect of any complicity in the matters that are the subject of the concern or an ensuing investigation or judicial proceedings. If you have reasonable grounds to fear that the reporting of an alleged breach will lead to repercussions, you can inform the

GBP Program Office of this in writing (Prinses Irenestraat 59, 1<sup>st</sup> floor, 1077 WV Amsterdam, The Netherlands) or via [integrity@philips.com](mailto:integrity@philips.com).

If you do not act in good faith and you abuse this Policy, for instance by submitting a concern maliciously, this will result in disciplinary or legal action (including termination of employment) being taken against you.

### **Appeal**

If you have indications that the GBP concern raised was not followed up on in line with this SpeakUp policy, you can request for an appeal by informing the GBP Program Office of this in writing (Prinses Irenestraat 59, 1<sup>st</sup> floor, 1077 WV Amsterdam, The Netherlands) or via [integrity@philips.com](mailto:integrity@philips.com). The time limit for submitting a notice of objection or appeal shall be six weeks after you have been informed of the outcome.

After you have filed your appeal, the GBP Program Office, or someone assigned by it, will review your case. They will assess whether due process took place in line with the internal Investigation Standards and Procedures, and if the investigative steps taken support the concluded outcome. The GBP Program Office can decide whether to accept the appeal and the best way to process it. The motivation for this decision as well as the outcome of the appeal will be provided to the reporter of the appeal in written form.

### **Monitoring and Continuous improvement**

All Philips employees are expected to comply with this policy. The GBP Program Office will monitor adherence to the policy. Non-compliance may result in remedial or disciplinary action. Additionally, the GBP Program Office will review and update this policy regularly to ensure it aligns with global regulations and fosters continuous improvement of our SpeakUp process.

In case of questions, feedback or doubts if policy principles are properly applied, please reach out to your [GBP Compliance Officer](#) or the GBP Program Office.



Policy Owner: Chief ESG & Legal Officer  
Approved by Board of Management  
Royal Philips (Koninklijke Philips N.V.)  
[www.philips.com](http://www.philips.com)