

The Philips logo, consisting of the word "PHILIPS" in a bold, blue, sans-serif font, is positioned in the upper left corner of a white square graphic with a blue gradient at the bottom.

Policy

# Philips SpeakUp Policy

May 2023\*

At Philips, we ensure the highest standards of business conduct. We do this by sustaining a culture in which all employees 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').

There may be situations in which people do not uphold the standards of business conduct, leading to potential violations of the GBP. This policy describes what you should do if you suspect or observe behavior that is not in line with our GBP. It intends to help you through the process of reporting a concern. It describes the process of filing a report, what information should be included, and what happens after it was filed. It also explains the process of the subsequent investigation for all parties involved.

We realize that this GBP investigation process, whether you are reporting something or otherwise involved, can make you feel uneasy or worrisome. Please know we have put [guarantees](#) in place to ensure due process and support you through this experience. You can read more about this below.

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\* The May 2023 **Philips SpeakUp Policy**, replaces the **Philips SpeakUp Policy** of 2021

## What 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 ('Concerns').

Examples of such topics include fraud and theft, conflicts of interest, corruption and bribery, violation of competition and antitrust law, and harassment. This list is not exhaustive. If you are unsure if your concern is a violation of the GBP, you can consult the GBP booklet, 'Ask a question' on Philips Speak Up (Ethics Line) or contact your [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 internally 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.

## How to report a concern – reporting channels

Concerns can be reported to your manager, GBP Compliance Officer or, online or via phone through Philips Speak Up.

### **GBP Compliance Officer**

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

### **Philips SpeakUp**

Philips SpeakUp is a toll-free telephone line and 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 persons. Concerns can be submitted via Philips SpeakUp on an anonymous basis.\* Do note that a comprehensive assessment of the concern might be more difficult when a concern is filed anonymously. For further information, you can also refer to the [Reporting & Contact section](#) on our Intranet. After filing a concern via Philips SpeakUp you receive a Report Key and a password with which you can access your report.

### **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 Group Legal Compliance (Amstelplein 2, HBT-16, 1096 BC Amsterdam, The Netherlands).

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\* Insofar as this is permitted by local law.

If the concern is about members of the Executive Committee, you can also submit your concern via regular mail to the Chairman of the Supervisory Board (Amstelplein 2, HBT-15, 1096 BC 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.

## Content of your concern

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

## What happens next?

### **Purpose**

The purpose of a GBP investigation is determining, through fact finding, if the reported behavior took place and if that behavior constitutes a violation of the GBP.

### **Investigation**

After a concern has been reported, a GBP Compliance Officer or someone assigned by Group Legal Compliance will review the concern and will initiate an investigation or redirect the concern to the appropriate grievance channels for investigation, if necessary. You as reporter might be asked additional questions via Philips SpeakUp, which you can access using your Report Key and password.

Investigations are performed in line with the [\[GBP Investigation Guidelines\]](#). This guarantees that the investigation is conducted in a fair manner and responsibly with respect to all parties involved. Group Legal Compliance is responsible for overseeing that the investigation:

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

We expect each employee involved in an investigation, regardless of being a witness, reporter or the subject of the investigation, to cooperate with the assigned investigator(s). This means that Philips expects all those involved in the investigation to share any relevant information that could help the investigation. Withholding this constitutes a breach of duty between the respective employee and Philips. Those involved in the investigation that will be requested to cooperate will receive due notice of this request.

### **Follow-up**

We believe it is important that the concern is dealt with in a timely matter. At the same time, a thorough investigation in line with our GBP Investigation Guidelines can take time.

Within a maximum period of two months after registering a concern, the GBP Compliance Officer will inform the reporter of the status of the investigation. If you submitted a concern to Philips SpeakUp, you can consult your report in the SpeakUp portal. If the investigation could not be completed within two months you will be informed of the expected date of completion.

### **Outcome**

The GBP Compliance Officer 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.

## **Guarantees**

### **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 Philips Internal Audit and Group Legal. This can also mean forensic auditors and legal counsel outside Philips who require this information to ensure compliance with this SpeakUp 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.

## No reprisals

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 Group Legal Compliance of this in writing (Amstelplein 2, HBT-16, 1096 BC Amsterdam, The Netherlands) or via [integrity@philips.com](mailto:integrity@philips.com).

If you are not in good faith and you abuse this SpeakUp 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 are not satisfied with the manner in which the concern was handled ('appeal'), you can inform the Group Legal Compliance of this in writing (Amstelplein 2, HBT-16, 1096 BC 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 the investigation was closed.

After you have filed your appeal, Group Legal Compliance, or someone assigned by Group Legal Compliance, will review your case. They will assess if due process in line with the GBP investigation guidelines took place, and if the investigative steps taken support the concluded outcome. Group Legal Compliance can reject or decide to triage the appeal through (an) existing appeal case(s), for example when there is malicious intent or there are already other appeals ongoing concerning the same fact pattern. 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.

If this overview does not answer all of your questions, please contact your GBP Compliance Officer.

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This policy is an integral part of the Philips General Business Principles  
[Search intranet: GBP, SpeakUp](#)

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