

Anti-Harassment & Anti-Discrimination Policy

PURPOSE

As stated in Signify's Integrity code, at Signify, we are committed to creating an inclusive, respectful, and equitable work environment where all employees can thrive. Harassment, discrimination, and any form of disrespectful behavior undermine our core values of integrity, diversity, and inclusion. The Anti-Harassment & Anti-Discrimination policy (the policy) sets forth a zero-tolerance policy for harassment and discrimination.

The policy applies to all employees, including interns and contingent workers of Signify and its controlled subsidiaries worldwide.

We make it visible and shared with all by committing to uphold ethical standards with all employees and stakeholders. We want to grow employees' awareness by providing training modules for all employees through our digital platform.

INCLUSIVE & RESPECTFUL WORKPLACE

Our Diversity, Equity, & Inclusion ambition is to offer equal opportunities to everyone, and ensure all employees are valued and feel safe to contribute their best.

We believe everyone at Signify deserves the same chance in building a lasting career, and the right to bring their authentic selves into the workplace.

RECOGNITION OF POTENTIAL MISCONDUCT

There are many different types of harassment. The following examples illustrate potential situations of harassment. They do not constitute a complete list of the various circumstances under which cases of harassment may arise.

EXAMPLES OF MISCONDUCT

Bullying: Repeated, aggressive behavior that harms or distresses the target. This can include verbal abuse, physical actions, or online harassment, often done subtly or out of sight.

Sexual Harassment: Unwelcome sexual conduct that creates an uncomfortable or hostile work environment. This includes verbal (inappropriate comments or requests), written (offensive messages), visual (sexual gestures or displays), and physical actions (unwanted touching or assault).

Physical Harassment: Any form of physical conduct that intimidates, threatens or harms an individual, such as physical attacks, threats, or unwelcome physical contact.

Discriminatory Harassment: Unfair treatment or offensive behavior based on personal characteristics such as physical/ mental disability, medical condition, age, race, ethnicity, religion, gender, or sexual orientation. This can be verbal, physical, or systemic.

Psychological Harassment: Persistent behaviors that undermine a person's psychological well-being, including repeated verbal abuse, isolation, or belittling someone's work or ideas.

Digital Harassment: The use of digital platforms to harm or abuse others, such as sending inappropriate messages, engaging in online bullying, or spreading harmful content via emails or social media.

HOW DO WE PREVENT MISCONDUCT

Speak Up Mindset

Signify employees must feel free and psychologically safe to share their ideas, opinions, and concerns without fear. The company is committed to creating an atmosphere that makes people feel comfortable voicing doubts.

Our commitment to the Speak Up mindset encourages our employees to speak up whenever something does not feel right by asking the following questions:

- Is it consistent with our Integrity code?
- Is it ethical?
- Is it legal?
- Will it reflect well on Signify and myself?
- Would I want to be treated this way?
- Would I want to read about this in the newspaper?

When the answer to any one of these questions is 'no' and an employee believes they are facing an ethical dilemma, we encourage them to contact their manager, HR, the Ethics Point, or their local Compliance Officer.

Harassment: A situation where unwanted conduct related to a protected ground of discrimination (for example, gender or religious belief, disability, age, or sexual orientation) occurs with the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive environment.

Discrimination: can occur directly or indirectly. Direct discrimination occurs when an individual is treated less favorably by comparison to how others, who are in a similar situation, have been or would be treated, and the reason for this is a particular characteristic they hold, which falls under a 'protected ground'. Indirect discrimination occurs when an apparently neutral rule disadvantages a person or a group sharing the same characteristics. It must be shown that a group is disadvantaged by a decision when compared to a comparator group.

COMPLAINT & RESOLUTION PROCEDURE

If a situation arises, the following roles and responsibilities exist to resolve the issue:

Role of the Offended Employee

An employee subjected to unwelcome and/or offensive behavior has the following options:

1. Although not required to do so, the offended employee can try addressing the problem directly with the offender. Often the offending person is unaware that their conduct is offensive and can resolve the situation by stopping the behavior when informed.
2. Consult your concern to any manager, supervisor, or Compliance Officer.
3. Report your concern to the Ethics Point – read Signify’s Integrity code, reporting policy, or Speak Up and [report online](#), by phone (find the applicable phone numbers [here](#)), or ask a question.

Role of Manager/ HR

An employer may be responsible for the acts of its managers, supervisors, and agents regardless of whether the employer knew, or should have known, of their occurrence.

Therefore, **a harassment complaint must never be ignored**, even though it may be considered minor.

Awareness & Prevention

- Managers/ HR are expected to serve as role models, embodying and promoting the company’s values and expected behaviors. They should actively foster a work environment free of discrimination and harassment, encouraging inclusivity and respect among all employees.
- Watch out for characteristics of an unhealthy work environment. Inquire about morale and be alert to interactions.
- Address unwanted behavior by capturing/deploying Signify’s performance management processes (as needed).

Know when to act

When prevention has not worked, take steps to end potential harassment. Report any alleged misconduct. Do not start your own investigation.

- **Managers must always inform the Compliance Office and/or the Ethics Point about any allegations of harassment.**

Role of the Allegedly Offending Person

Everyone is responsible for their conduct and how it is perceived in the workplace. If an offended employee approaches an allegedly offending person and asks for the conduct to stop, the allegedly offending **person should be receptive, respect the request, and stop the behavior**. One of the factors in determining what form of disciplinary action is taken after a policy violation has occurred will be whether the allegedly offending person ignored a request to stop.

When an employee speaks up, keep in mind that an opportunity is given to clarify and resolve the situation.

Upon receiving a complaint through any listed channels of reporting, the company or its designee will promptly and thoroughly investigate following the following the [Reporting Policy](#). If a violation is confirmed, the company will take immediate and effective action to stop the behavior. Investigation details will remain as confidential as possible, shared only with those who need to know.

COMPANY’S RESPONSES TO POLICY VIOLATIONS

Failure by an employee to comply with this policy and/or applicable laws will result in corrective actions, disciplinary measures, and/or legal action up to and including termination, as per **Signify’s Integrity code**, found at [EthicsPoint – Signify](#).

- Corrective and disciplinary measures may include verbal warning, written warning, internal action (change of role, financial impact, etc.), contract termination, or other legal actions.

This list is not exhaustive. Sanctions are proportionate to the misconduct and may vary as they will be determined in full compliance with relevant applicable local labor laws and procedures.

WHO CAN I REACH FOR QUESTIONS AND WHERE TO REPORT?

- Any employee, in any location worldwide, who has questions regarding the scope, application, or meaning of this policy should contact a local HR advisor, Manager, or the Compliance Officer.
- The Signify Ethics line is available 24 hours a day, 7 days a week, and 365 days a year for you to report any violations or suspected violations of Signify policies. Find the applicable phone numbers [here](#).