

SIGNIFY AI POLICY

1. Our commitment

Artificial Intelligence has the potential to support innovation, efficiency and quality improvement across our business and for our stakeholders. At the same time, AI can create risks relating to privacy, security, fairness, transparency, reliability, intellectual property and environmental impact.

Signify is committed to the responsible use, development and deployment of AI systems. We seek to use AI in a way that is lawful, ethical, secure, transparent, human-centered, and aligned with our Integrity Code, our values and our commitment to responsible business conduct.

This Responsible AI Policy sets out the principles that guide the use, development, procurement and deployment of AI systems by Signify employees and, where relevant, by business partners acting for or on behalf of Signify. It provides a public summary of Signify's approach to responsible AI and is supported by internal governance, processes, controls, guidance and training. It does not replace internal policies, procedures or controls applicable within Signify.

2. Scope

This policy applies to the use, development, procurement and deployment of AI systems within Signify and, where relevant, in relation to Signify products, systems and services.

For the purpose of this policy, an AI system means a machine-based system that, for explicit or implicit objectives, can generate outputs such as predictions, content, recommendations or decisions that may influence physical or virtual environments.

3. Our responsible AI principles

3.1 Accountability and governance

Signify aims to maintain clear accountability for the responsible use, development, procurement and deployment of AI systems. People remain accountable for the appropriate use of AI systems, and AI should support human judgment and decision-making, not replace accountability.



Signify maintains governance arrangements to support responsible AI, including cross-functional involvement from relevant areas such as Digital and IT, Legal, Security, Privacy, Risk, Quality, Innovation and business functions, as appropriate.

3.2 Compliance and clear boundaries for AI use

Signify uses AI in accordance with applicable laws and regulations. AI systems should be used only for appropriate and approved purposes, and employees and relevant business partners are expected to follow applicable internal rules, guidance and approval processes when using AI.

In particular, Signify does not support the use or deployment of AI systems intended to enable manipulative behavior, exploitation of vulnerabilities, social scoring, or unauthorized biometric surveillance, where such practices are prohibited by applicable law or inconsistent with our responsible business principles.

Access to certain AI capabilities may be restricted based on their level of risk or sensitivity. AI should not be used to bypass legal, compliance, security, privacy, quality, intellectual property or ethical requirements.

3.3 Privacy and data protection

Signify is committed to respecting privacy and protecting personal data in the use, development and deployment of AI systems. AI systems should process personal data only where there is a lawful basis and a legitimate business purpose. Personal data should be limited to what is necessary for the intended purpose and handled in accordance with applicable privacy and data protection requirements.

Where AI systems involve personal data or may affect individuals, privacy risks should be assessed and managed through appropriate processes. Signify seeks to maintain the ability to respect applicable data subject rights, including rights relating to access, correction and objection, where required by law.

3.4 Cybersecurity and information security

Signify is committed to protecting the confidentiality, integrity and availability of systems, data and information used in or generated by AI systems. AI systems should be developed, procured, deployed and used with appropriate cybersecurity and information security measures.

This includes taking reasonable steps to protect personal data, company information, customer information, trade secrets, intellectual property and other



confidential information. When AI systems are provided by third parties, Signify seeks to apply appropriate due diligence, contractual safeguards and security controls, taking into account the nature and risk of the AI system and the data involved.

3.5 Fairness, non-discrimination and bias mitigation

Signify seeks to use, develop and deploy AI systems in a way that is fair, reasonable and non-discriminatory. AI systems should be designed, selected and used with attention to potential bias and potential adverse impacts on people or groups.

Where relevant and proportionate, Signify aims to assess, test, monitor and review AI systems to help identify and reduce the risk of unfair, discriminatory or harmful outcomes over time. AI outputs should not be used in a way that undermines human dignity, equal treatment or access to opportunities.

3.6 Human oversight and responsible use of AI outputs

Signify believes that appropriate human oversight is essential for responsible AI. Where AI is used in decisions or processes that may have a significant effect on individuals, customers, safety, compliance or other important interests, Signify seeks to ensure that appropriate and meaningful human review, intervention or escalation is possible.

Employees are expected to use professional judgment when relying on AI-generated outputs and to verify outputs where necessary, especially for important, sensitive, external or decision-relevant use cases. AI-generated outputs should not be treated as automatically accurate, complete or suitable for use without appropriate human review.

3.7 Transparency and explainability

Signify aims to use AI in a transparent and understandable way, appropriate to the context and risk of the AI system. Where people interact with an AI system, where AI-generated content is used in relevant contexts, or where AI supports decisions that may affect stakeholders, Signify seeks to provide appropriate transparency.

This may include making users aware that they are interacting with AI, making AI-generated content or AI-supported decisions clearly identifiable where relevant and proportionate, explaining the purpose of the AI system, and providing relevant information about its capabilities and limitations.



Signify also seeks to maintain appropriate explainability for AI systems, taking into account the nature, intended use and risk of the system, so that relevant decisions, outputs and controls can be understood where needed.

3.8 Reliability, risk control and monitoring

Signify applies a risk-based approach to AI. AI systems should be assessed and controlled in a manner proportionate to their intended use, context, potential impact and risk profile. Where AI systems are subject to specific legal requirements, including requirements for higher-risk AI systems, Signify seeks to apply appropriate controls and governance before and during use.

3.9 Intellectual property and responsible content use

Signify respects intellectual property rights in the use, development and deployment of AI systems. Employees and relevant business partners should use AI tools, data, content and outputs in a way that respects applicable intellectual property rights, contractual restrictions, confidentiality obligations and licensing terms.

Signify also aims to protect its own confidential information, proprietary content, technology and intellectual property when using AI systems.

3.10 Environmental impact

Signify recognizes that AI systems and related computing processes can contribute to energy consumption and greenhouse gas emissions. In line with Signify's climate commitments, we aim to consider and reduce the environmental impact of AI systems where relevant and proportionate.

This includes encouraging efficient use of computing resources and, where relevant, engaging with suppliers and partners to improve the energy efficiency and environmental performance of AI-related infrastructure.

3.11 Training and awareness

Signify aims to equip employees who use, develop, procure or deploy AI systems with appropriate awareness, guidance and training. Training and awareness activities may cover responsible AI principles, privacy, cybersecurity, risk management, human oversight, transparency, intellectual property, appropriate use of AI-generated outputs and applicable internal processes.



Employees are expected to use AI responsibly and to seek guidance where they are uncertain about whether a particular AI use is appropriate. Signify provides internal guidelines on the responsible use of AI and makes relevant learning available through our internal learning platform, including AI Policy training for employees, as applicable.

4. Incident reporting and continuous improvement

Employees and relevant business partners are expected to report concerns, incidents or suspected misuse involving AI systems through the Ethics Line or other applicable internal reporting channels.

Signify seeks to review and improve its responsible AI approach over time, taking into account technological developments, regulatory changes, stakeholder expectations, lessons learned, internal experience and, where feasible, the measured impact of AI applications on business performance and sustainability outcomes.

This policy is endorsed by Kai Erik Wehmeyer, Head of Compliance.