



Subject: Anti-corruption & anti-money laundering policy

Date: Version 2, March 2021

General

Signify is subject to laws and regulations on anti-corruption and anti-money laundering in many jurisdictions. These prohibit corruption in the public as well as in the private sector and money laundering. To ensure compliance with all applicable laws and regulations, our company has implemented the following mandatory standards:

- Signify does not tolerate any form of corruption and/or money laundering. Under no circumstances shall we give, promise, authorize, take or accept, directly or indirectly (via third parties), bribes or other improper benefits. This strict prohibition applies to all forms of bribes or other improper benefits provided to or received from any person. "Person" includes government officials, representatives of state-owned entities, or (other) customers, suppliers or business partners. Under no circumstances do we engage in any form of money laundering.
- All books and records must be sufficiently detailed to reflect accurately all transactions and other business engagements, in line with applicable international accounting standards. "Off the books" or secret accounts are forbidden and no false, artificial or misleading information is included in any books or records.
- Any gift and/or hospitality offered or received must be reasonable, proportionate and appropriate under the circumstances of the case. We do not offer or accept gifts, or hospitality that are improper or where there is a risk that it could be perceived as such.
- Facilitation payments are always prohibited. Facilitation payments (also called "facilitating", "expediting" or "grease" payments) are small unofficial and non-transparent payments made to government officials to secure or expedite routine governmental actions, that involve no discretion on the government official's part.
- Signify does not make any contribution, in money or otherwise, to political parties, political organizations or politicians.
- Charitable contributions, donations or sponsorships can only be made to authentic and legitimate organizations. Our company has specific procedures in place that must be followed, such as proper due diligence and prior approval from Legal.



- Incentive programs follow specific procedures. They may not be offered directly to employees of a business partner and strict monetary limits apply. All incentive programs require pre-approvals.

Our commitment to comply with anti-corruption and anti-money laundering laws is a joint responsibility

Violation of anti-corruption and anti-money laundering laws can result in significant fines and severe reputational damage for our company. In addition, companies can be forced to repay profits resulting from the illegal conduct and may be suspended or excluded from doing business with the government.

Signify has a strong commitment to comply with all applicable laws and regulations. This is not only a responsibility of our company, but also of all Signify employees worldwide. Our company expects the same commitment from its business partners. To that end, it may conduct risk-based screening or due diligence to assess the risks of doing business with these partners.

Status of the Anti-corruption and anti-money laundering policy

Our Integrity code sets out our core principles on how we conduct business. Our *Anti-corruption and anti-money laundering policy* forms an integral part of our Integrity code and sets out our global minimum standards. Our policy includes specific guidance on topics such as gifts and hospitality, books and records, facilitation payments, political contributions, charitable contributions and highlights potential suspicious facts, to combat money laundering.

Local laws and regulations may set stricter requirements than those provided by our *Anti-corruption and anti-money laundering policy*. In this event, these stricter local requirements are implemented by our local organizations.