



Subject: Anti-Bribery & Anti-Corruption policy

Date: Version 1, January 2019

General

Signify is subject to the laws and regulations on anti-bribery & anti-corruption (“**ABAC**”) in many jurisdictions. These laws and regulation prohibit bribery and corruption in the public and private sector. To ensure compliance with all applicable ABAC laws and regulations, our company has implemented the following mandatory standard.

- Signify does not tolerate any form of bribery or corruption. 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 and representatives from (other) customers, suppliers or other business partners.
- All books and records must be sufficiently detailed and reflect accurately and timely 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 a gift or hospitality that is improper or where there is at least a risk that it can be perceived as such.
- Facilitation payments are always prohibited. Facilitation payments (or “facilitating”, “expediting” or “grease” payments) are small payments made to a government official to secure or expedite routine governmental actions that involves no discretion on the government official's part.
- Signify does not make any political 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 local Legal.



These are set out in detail in the **ABAC manual**.

- Any conflict of interest, or potential conflict, must always be avoided. A conflict of interest is or might be at issue when you have a private or personal interest that could risk your ability to act in the interest of Signify.

Violation of ABAC 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.

Commitment to comply with ABAC laws is a joint responsibility

Signify has a strong commitment to comply with all applicable ABAC 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 our partners.

Status of this ABAC policy

The Integrity code set out our core principles on how we conduct business. The ABAC policy forms an integral part of our Integrity code. This policy sets out our company's global minimum ABAC standard.

This ABAC policy is further detailed in the **Anti-Bribery & Anti-Corruption manual**. This manual includes specific guidance on topics such as gifts and hospitality, books and records, facilitation payments, political contributions, charitable contributions and conflicts of interest. It is noted that the ABAC manual forms part of our Integrity code as well, and its standard is mandatory.

Local laws and regulations may set stricter requirements than those provided in the ABAC policy and ABAC manual. In that event, these stricter local requirements need to be implemented by the local organization.