



**Subject: Integrity reporting policy**

Date: Version 1, January 2019

## Introduction

Signify is committed to ensuring the highest standards of business conduct and has incorporated this commitment in its Integrity code and underlying policies. There may, however, be situations in which people do not uphold the standards of business conduct defined in the Integrity code. This policy describes what you should do if you suspect or observe such behavior.

## Reporting channels

You are urged to report to your local Compliance Officer or the [Ethics line](#) any concerns relating to the application of the Integrity code which you are unable to resolve with your management or which constitute a direct threat to corporate integrity ('complaints').

You will find the contact details of the respective local Compliance Officer on our Signify community '[Legal @ Signify / Integrity & Legal compliance](#)' (intranet). Complaints can be submitted to the Compliance Officer directly in person, or by phone, e-mail or regular mail.

The [Ethics line](#) is a toll-free telephone line and internet portal available to all employees 24 hours a day / 7 days a week / 365 days a year. Complaints can be submitted via the [Ethics line](#) on an anonymous basis, insofar as this is permitted by local law, although anonymity can make a comprehensive assessment of the complaint more difficult. For further information, please refer to the [Speak up](#) page on our Signify community.

If you do not have access to a Compliance Officer or to the [Ethics line](#) you can submit a complaint to the Secretary of the Integrity Committee (Jupiter Plaza Arena, Herikerbergweg 102, 1101 CM, Amsterdam, the Netherlands).

If the complaint concerns the Chairman of the Integrity Committee or members of the Board of Management, you can submit your complaint to the attention of Chairman of the Supervisory Board of Signify (Jupiter Plaza Arena, Herikerbergweg 102, 1101 CM, Amsterdam, the Netherlands).

This Integrity Reporting Policy is intended to supplement more specific (local) grievance or complaint procedures, for example by offering the option to involve an ombudsperson in the case of harassment. If you wish to raise an issue for which there is a more specific procedure



or grievance channel available, you are encouraged to use that procedure/channel, e.g. the applicable Human Resources procedures for employment issues.

### Content of the complaint

You are expected to disclose all relevant information known to you in order to assist Signify in its response to, or investigation of, a complaint and to allow a proper assessment of the nature, extent and urgency of the matter.

### Reporting procedure

Any complaint you wish to make must be submitted internally in line with this Integrity Reporting Policy in order to allow Signify to take any appropriate corrective action that may be necessary in order to limit as far as possible any potential impact on Signify.

### Investigation

When a complaint is registered, a Compliance Officer (or other person assigned by the Integrity Committee) will arrange for the complaint to be investigated or for it to be redirected to the appropriate grievance channels. The investigation will be conducted in a manner that is fair and responsible with respect to all parties involved. The Integrity Committee has oversight responsibility for ensuring that the complaint is investigated in an independent, impartial and unbiased manner, focusing on fact-finding with due observance of national and international legislation and any applicable regulations. Each employee involved in an investigation is expected to cooperate with the assigned investigator(s). If an employee withholds relevant information, this constitutes a breach of duty between the respective employee and Signify. For further information about the investigation, refer to the Signify Investigation manual.

Within a maximum period of two months after registration of the complaint, the Compliance Officer will inform you of the outcome of the investigation. If you submitted a complaint to the Ethics Line you can contact the Ethics Line two months after the reporting date, using the ID number given to you. If an investigation is commenced and not completed within two months you will be informed of the expected date of completion. If you are not satisfied with the manner in which the complaint is being handled, or if you have reasonable grounds to fear that the reporting of an alleged breach will lead to repercussions, you can inform the Secretary of the Integrity Committee of this in writing (Jupiter Plaza ArenA, Herikerbergweg 102, 1101 CM, Amsterdam, the Netherlands).

### Confidentiality

Information relating to the alleged breach, including your identity or the identity of other persons involved in an inquiry or investigation, shall only be disclosed to those functions within Signify (i.e. the investigator(s), the respective Compliance Officer(s) and members of the Signify Internal Audit as well as the Legal Department) or outside Signify (e.g. forensic auditors and legal counsel) who require this information in order to ensure compliance with this Integrity Reporting Policy and legal or regulatory obligations, or as input for subsequent



judicial proceedings. Signify employees who participate in an investigation must keep the matter confidential.

### No reprisals

Signify shall not dismiss, demote, suspend, threaten, harass or in any manner retaliate against an employee on account of his/her having made a complaint in good faith, having disclosed information relating to a complaint as part of an investigation, or having participated in some other way in an investigation relating to a complaint. 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 give them immunity in respect of any complicity in the matters that are the subject of the complaint or an ensuing investigation or judicial proceedings. Any abuse of this Integrity Reporting Policy, such as the submission of a complaint which is later proven to have been made maliciously or which was known to be false, will result in disciplinary or legal action (including termination of employment) being taken against the employee who has abused this Integrity Reporting Policy.

This policy is an integral part of [Integrity code](#) (Signify N.V.)  
<https://www.signify.com/global>