



# Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy

## March 2025

### Purpose and scope

Philips is committed to doing business in a responsible way. While pursuing our business objectives, we aim to be a responsible partner in society, acting with integrity toward our customers and patients, our employees, business partners, and shareholders, as well as the wider community in which we operate.

Bribery, corruption and money laundering have adverse consequences for society, the markets in which we operate, our company and employees. In view of our commitment to do business responsibly and to comply with legal obligations, we have established this Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy.

**Purpose:** This policy establishes the principles within Philips to prevent bribery, corruption and money-laundering. This Policy outlines Philips' global minimum standards on bribery, corruption and money laundering, while the Anti-Bribery, Anti-Corruption and Anti-Money Laundering Standards include further guidance on these minimum standards. Local laws, regulations, industry codes and the business environment may set stricter requirements than included in this policy, in which case these stricter or more specific local requirements will apply and take precedence over this policy to the extent they cannot be applied in parallel.

**Scope:** This Policy applies to and must be understood by all Philips Employees enterprise-wide and it is an integral part of our Philips General Business Principles. Further information on the structure of Philips Anti-Bribery, Anti-Corruption and Anti-Money Laundering, key responsibilities in this area and accountabilities of stakeholders involved can be found in the [Manual on Philips ABAC Legal Compliance Program](#).

### No bribery, corruption and money laundering

- At Philips, **we do not employ corrupt practices or commit acts of bribery**. We do not attempt to influence healthcare professionals, patients, customers, government officials or other business partners through improper inducement. We do not give or receive – either directly or indirectly – anything of value (including any payment, benefit, gift or hospitality) in order to obtain or retain business, influence business decisions, or secure an improper personal or business advantage. We do not engage in the practice of **facilitation payments** to speed up or secure the performance of a routine government action.
- **We do not engage in fraud**. We do not intentionally deceive or misrepresent others to obtain an illicit personal or business advantage.

- **We do not engage in money laundering.** Under no circumstances shall we engage in or facilitate processes aimed at disguising, concealing, transferring or converting the proceeds of criminal activities in a way that they appear to have come from a legitimate source.

#### **We record and report information accurately, completely and honestly**

We do not make misleading or false statements. We keep records of transactions, funds and assets in a transparent, accurate, complete and timely manner, demonstrating the nature of the transaction, in accordance with Philips' accounting standards. We record all payments properly and fairly in appropriate books of account.

#### **Monitoring and Continuous Improvement**

All Philips employees are required to comply with this Policy and with anti-bribery, anti-corruption and anti-money laundering laws and regulations. We expect our business partners to apply similar standards. Breaches will not be tolerated. For employees, breaches may lead to remedial and disciplinary actions including termination of employment. For business partners, breaches could, for example, lead to termination of contracts and claims for damages.

You can reach out to the following channels for concerns relating to bribery, corruption or money-laundering:

- [Your Local Legal Contact or GBP Compliance Officer](#)
- [Group Legal Compliance - Anti-Bribery and Anti-Corruption & Healthcare Compliance Subject Matter Experts](#)
- [Philips SpeakUp \(Intranet\)](#)

**Group Legal Compliance – Anti-Bribery & Anti-Corruption and Healthcare Compliance** should always be involved promptly when a governmental authority or other third-party contacts Philips with an Anti-Bribery, Anti-Corruption or Anti-Money Laundering related allegation or request for information. For more information about this Policy, including our standards for payment to third-parties and responding to red flags, please see the [ABAC and AML Standards](#).



Policy Owner: Chief ESG & Legal Officer  
Approved by the Board of Management

Royal Philips (Koninklijke Philips N.V.)  
[www.philips.com](http://www.philips.com)