

PHG Group Anti-Corruption Policy Statement June 2024

At PHG, we are dedicated to working against all forms of corruption and upholding the highest ethical standards in all our business dealings and relationships. We have a zero tolerance for bribery, extortion and any other form of corruption.

This policy reflects our commitment to act fairly, honestly and with integrity in all our interactions, and abide by all relevant anti-corruption and anti-bribery laws in the regions that we operate. Our commitment is articulated further in our Employee Code of Conduct, which comprises this statement along with specific policies and procedures.

This Policy extends to all PHG employees, affiliates, and third parties acting on behalf of PHG and applies universally across all PHG office locations.

Our Commitments

As a participant in the UN Global Compact (UNGC), we are committed to the Anti-Corruption Principle (Principle 10) derived from the United Nations Convention Against Corruption. Our aim is to ensure we do not engage in any form of corruption, work to mitigate risks, and implement robust disclosure procedures for if incidents should occur.

Our Employee Code of Conduct provides further detail on our commitments. Our Anti-Corruption Policy states we uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, such as the UK Bribery Act 2010. We strictly prohibit the offering, giving, receiving, or soliciting of bribes or any other form of improper payment, whether directly or indirectly, to gain or retain business or any undue advantage. Through our Gifts and Hospitality Policy, we commit to not accept or give gifts, hospitality, entertainment, or any other type of preferential benefit to any individual or organisation or ask any third party to do so on our behalf, that could influence or appear to influence the outcome of a business decision.

Our Whistleblowing Policy provides guidance to employees on how to recognise and deal with unethical incidents, ensuring confidentiality and protection against retaliation. We commit to protecting employees from suffering any detriment or termination of employment for making qualifying disclosures, including, but not limited to, failures to comply with legal obligations or concealing information related to failure to comply.

All PHG employees are responsible for ensuring compliance with this policy. Furthermore, we will regularly monitor our anti-corruption commitments to ensure that we are continuously operating with the highest ethical standards and mitigating risks of non-compliance.