

CODE OF CONDUCT

UDMILA LESCINSK





Put consumers and people first

Seek out new opportunities

Strive for excellence

Build shared success

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SECTION 1

DO THE RIGHT THING. ALWAYS





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DOING THE RIGHT THING. ALWAYS

WELCOME TO OUR CODE



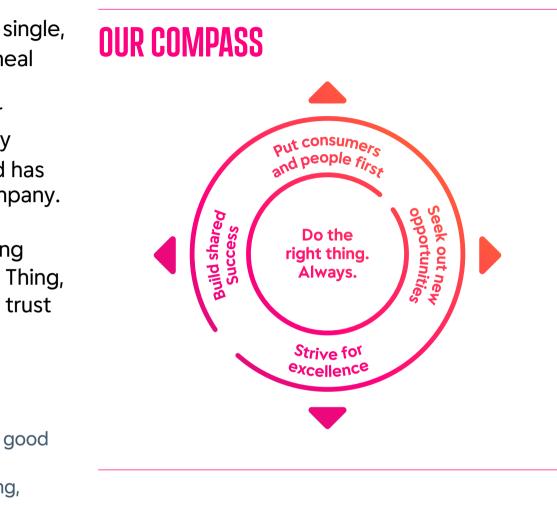
At Reckitt, we're united by a single, shared Purpose: to protect, heal and nurture in the relentless pursuit of a cleaner, healthier world. With such a profoundly important Purpose, the world has high expectations of our company.

It's only through an unwavering commitment to Do the Right Thing, Always that we can maintain trust with society.

Our Code provides clarity on our expectations so that you can confidently live our values, make good decisions and deliver on our commitment to Do the Right Thing, Always.

I am counting on you to follow this Code and come back to it whenever you're navigating a complex situation and looking for the right way forward. It's through your actions in bringing the Code to life in your day-to-day work that we will continue to build lasting trust with society and fulfil our Purpose.

Kris Licht Chief Executive Officer





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WHO IS OUR CODE of conduct for?

EVERY...

- Employee
- **Contractor** (including agents, consultants, outsourced personnel and other representatives)
- Joint venture we participate in
- Board of Directors member
- Third party

Since our Code is a guide to putting our values into action every day, it's something you should refer to time and time again.





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WHAT YOU'RE RESPONSIBLE FOR

No matter what job you do and where you do it, you are Reckitt. Make sure your actions always reflect our values.

As an employee, you're expected to:



Familiarise yourself with the Code, our policies and with the laws applicable to you.

Take our mandatory Code of Conduct training.





Think before you act: follow our **Compass**, embody our **Leadership Behaviours** and always behave ethically.

FOLLOW THE CODE, OUR COMPASS AND LEADERSHIP **BEHAVIOURS**

Raise any concerns about violations of this Code, the law or our policies.





IF YOU'RE A PEOPLE MANAGER, LEAD AND SUPPORT YOUR TEAM

Lead by example, including by creating an environment where people feel comfortable raising their concerns for the greater good of Reckitt.

Assess compliance with the Code as part of your team's appraisal process.



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HOW TO MAKE Good Decisions

Our Code is full of guidance to help you make the right decisions, but it doesn't cover every situation you might face. That's why it's important to exercise good judgement and be guided by our <u>Compass</u> and <u>Purpose</u>. Our actions should also be consistent with our <u>Leadership Behaviours</u>.

When you're faced with a complex situation, follow our three-step check:

1. PAUSE

Pause before you act. Is what you plan to do legal? Is it aligned to our Compass, Purpose and Leadership Behaviours?



Does the action fit within our Code, policies and standards? Would it withstand public scrutiny? Is it the Right Thing, Always?

3. ASK

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If in doubt, ask for help: raise your concerns with a trusted leader or member of the HR, Legal or <u>Ethics</u> & <u>Compliance Function</u>.



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DOING THE RIGHT THING. ALWAYS

YOUR DUTY TO RAISE CONCERNS AND HOW TO DO SO

At the centre of our Compass is our commitment to Do The Right Thing, Always.

You have a duty to speak up as soon as you observe, or suspect misconduct: the quicker you raise your concerns, the quicker we can take corrective action.

FIND OUT MORE



Raise a concern in a way that works for you:

YOUR LINE MANAGER

What if?

Generally, the first person you should approach when raising a concern is your Line Manager, who may be able to address it or engage those who can.

should I do?



If approaching your Line Manager is inappropriate, for whatever reason, then you should raise your concern with a trusted leader, your Human Resources Business Partner or a member of the Legal or Ethics & Compliance Team. They may be able to address your concern, help mediate on your behalf or point you towards our grievance procedures.



A TRUSTED LEADER, HUMAN RESOURCES BUSINESS PARTNER, OR MEMBER OF THE LEGAL OR ETHICS & COMPLIANCE

THE SPEAK UP! SERVICE

If you genuinely believe your concern cannot be dealt with through the channels mentioned here, for whatever reason, please raise a confidential report through the **Speak Up! Service**. You can report your concern anonymously, where permitted by law, although we encourage you to speak up in confidence. You can trust that all reported concerns are taken seriously and assessed by select members of our Ethics & Compliance Team who will determine next steps.

NO TOLERANCE FOR RETALIATION

We value the help of those who report concerns in good faith. Retaliation against those using the Speak Up! Service in good faith or assisting the investigation of a Speak Up! report will not be tolerated.

I have a concern that I want to raise, but I'm worried about how doing so could impact the relationship with my colleagues. What

A

Raising your concerns is the right thing to do, always. Appropriate steps will be taken to protect your identity, the confidentiality of what you share and we won't tolerate retaliation of any form, by anyone. If you feel like someone is retaliating against you for raising a concern in good faith, please seek help through any of the above channels. Refer to **Ethics & Compliance** if you're unsure.



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SECTION 2

CONSUMERS AND PEOPLE FRST





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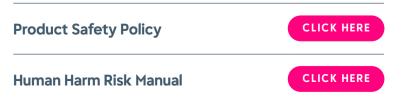
PUT CONSUMERS AND PEOPLE FIRST

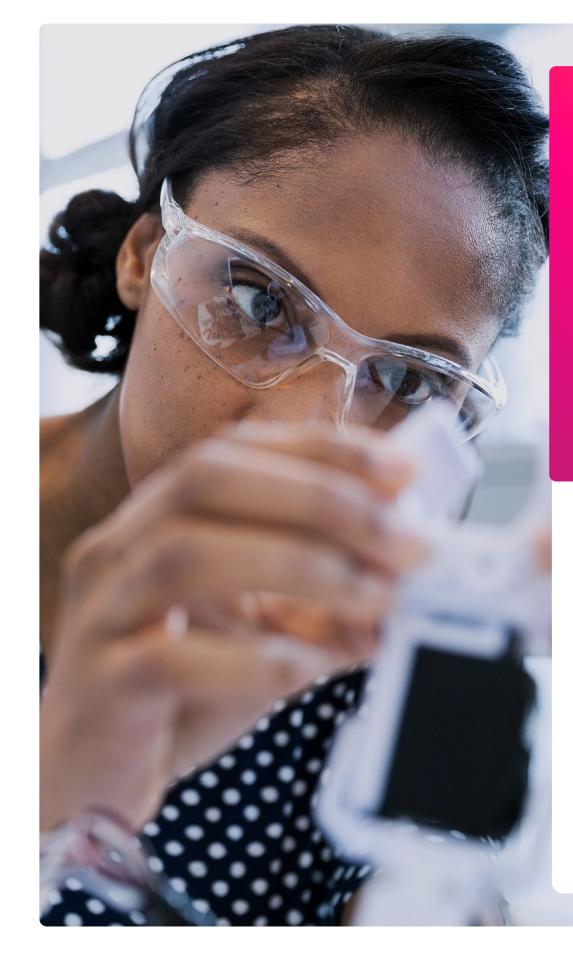
DELIVER SAFE, Regulatory compliant & High-quality products

At Reckitt, our goal is to ensure the safe and proper use of our products improving the lives of the people we serve, the communities in which we operate and the environment.

Our reputation is reflected in every product we sell: that's why our products must always meet quality and safety standards and the relevant regulatory requirements.

FIND OUT MORE







- Ensure that our products meet our quality standards and are safe to use.
- Incorporate safety-by-design principles at every stage of our products' lifecycle and ensure compliance with all relevant regulatory requirements.
- Report any negative feedback and adverse events related to our products' safety, quality or performance to your local <u>Drug Safety</u> <u>Officer</u> within 24 hours.

? What if?

A friend mentioned that she had a rash after using Veet, though I doubt there's anything wrong with our product... Is there anything I should do?

Inform your local **Drug Safety** <u>Officer</u> as soon as possible: we will analyse the adverse event and leverage the information brought to our attention to develop/redevelop products that meet safety expectations 'by design'.



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PUT CONSUMERS AND PEOPLE FIRST

COMMUNICATE RESPONSIBLY WITH OUR CONSUMERS

We put people's lives and needs at the heart of our business: that's why we communicate our products' quality, efficacy, safety and value for money to our consumers.

FIND OUT MORE

Responsible Marketing Policy	CLICK HERE
Responsible Marketing Principles	CLICK HERE
Breast-Milk Substitute Marketing Policy	CLICK HERE





- Follow our <u>Responsible Marketing</u> <u>Policy</u> and <u>Principles</u> and comply with all applicable laws.
- Ensure our Infant and Child Nutrition marketing practices comply with our Breast-Milk Substitute Marketing Policy.



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PUT CONSUMERS AND PEOPLE FIRST

VALUE UNIQUENESS & Consciously include

Diversity within our workforce enables us to better understand, represent and serve the communities we work in.

We're committed to providing an environment where all our people feel able to participate fully, be themselves and realise their potential.

FIND OUT MORE

Anti-Harassment, Discrimination, Violence and Bullying Policy



Inclusion Policy







- Treat everyone with dignity and respect.
- Promote equal opportunities, fair and inclusive treatment for everyone we work with and make reasonable accommodations based on dimensions of diversity.
- Report bullying, discrimination, hostile conduct or harassment as outlined <u>here.</u>



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PROVIDE SAFE & HEALTHY WORKING CONDITIONS

Providing a safe and healthy workplace is essential for us to thrive. That's why we must comply with all applicable health, safety and environmental laws as well as with our own environmental Health & Safety requirements.

FIND OUT MORE

Employee Health & Safety Policy







- Follow all Health & Safety rules and workplace guidance.
- Take necessary precautions to protect yourself, your co-workers and visitors.
- Do not engage in any threats, acts of violence or physical intimidation and keep our workplace weapons-free.
- Immediately <u>report</u> accidents, injuries and unsafe practices or conditions.





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SECTION 3

SEEK OUT NEW Opportunities





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SEEK OUT NEW OPPORTUNITIES

SAFEGUARD OUR CONFIDENTIAL INFORMATION

Our confidential or proprietary information is a tremendously valuable asset, which sets us apart from our competitors. Protecting it is paramount for our success.

FIND OUT MORE

Cyber Security Policy



Competition Law Policy

Your role

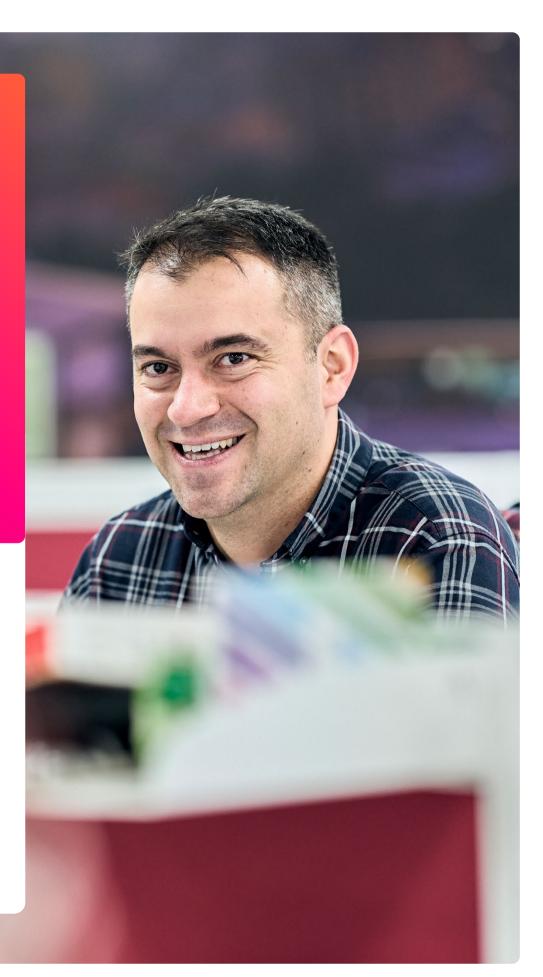
- Safeguard any information that demands stricter levels of protection.
- Before disclosing any confidential information, ensure this is on a strict 'need to know' basis and restrict the onward use and distribution of this information.
- Do not share our confidential or proprietary information with competitors.
- Do not misuse or disclose any confidential or proprietary information or trade secrets, during or after your employment.

What if?

During my train commute, my manager phoned me to discuss confidential matters. I am conscious of being in a public space, but my manager tells me he cannot wait. What should I do?

The confidentiality of our company's information is paramount. Tell your manager you'll share the details later, from a private place.







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SEEK OUT NEW OPPORTUNITIES

PROTECT PERSONAL INFORMATION

We respect the privacy of our consumers, co-workers and others we do business with and we are committed to handling their personal information (any information relating to an identified or identifiable individual) with care.

When things go wrong, we investigate them and remediate them in a timely fashion.

FIND OUT MORE







- Follow our **Data Privacy Governance Policy** and the laws of the country you work in.
- Ensure consumers' personal information is handled in accordance with the ethical values set out in our <u>Responsible Consumer</u> <u>Data Principles.</u>
- Only collect, use and process personal information for legitimate purposes.
- Securely store personal information and dispose of it once no longer needed.
- Report any actual or suspected data breaches via <u>Assist.</u>



I'm working on a marketing campaign with a tight deadline. I want to send the target audience's list to my personal email account so I can work on it when I get home this evening. Is this okay?



Never send personal information or any other non-public information to your personal email account. You can access company information while outside the office securely by logging on to OneDrive via our multi-authentication procedure.



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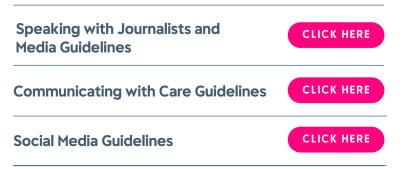
COMMUNICATE RESPONSIBLY

Our success depends on our stakeholders' trust that we provide clear, accurate, complete and consistent information. Always communicate responsibly, taking care that your words don't have unintended consequences.

If you're using social media, use them wisely:

- Never disclose confidential information,
- Be respectful in your interactions, and
- Use caution around topics which may be considered inflammatory.

FIND OUT MORE







- Ensure your communications are ethical and responsible: consider their content carefully and be mindful that your words could be taken out of context.
- Don't agree to interviews or speaking engagements regarding our company without the approval of the <u>External</u> <u>Affairs Team</u>.
- Forward any request to discuss our company's business with members of the press, investors or market analysts to the **External Affairs Team**.
- When using social media, think before you post: be careful and be respectful.



I received an email from a journalist asking for a short statement on a story that casts Reckitt in a critical light. What should I do?



Never communicate with journalists unless you are an authorised spokesperson or you have explicit authorisation to do so. Forward the email to the **External Affairs Team** and ask for their support.



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SECTION 4

STRIVE FOR EXCELLENCE





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STRIVE FOR EXCELLENCE

ACTING WITH INTEGRITY

We win business based on the quality of our products and services, not by unethical or unlawful means.

We have zero tolerance for bribery and corruption. We don't offer or accept improper payments and we do not tolerate improper payments by third parties working on our behalf.

FIND OUT MORE



Your role ALWAYS:

Think about the intent of your actions, and how others might perceive them.

Exercise caution when dealing with people in a position of power, like Government Officials, and ensure your dealings are legitimate and ethical.

Be complete and accurate when recording payments and expenses; monitor the work third parties do for us.

What if? My favourite artist is performing in town! A supplier who is taking part in a tender invites me to the concert to "talk business". Can I go?

NEVER:

Improperly offer, give, promise, request or accept anything of value to gain, retain or reward business directly or via third parties.

Accept or request improper payments. An improper payment is the exchange of something of value to influence a transaction (e.g. bribes, gifts, donations, etc.).You should assume that giving a benefit to a Government Official is improper unless explicitly permitted by Law or by our Policies.

Use Reckitt's money for political donations.

No. The supplier is trying to secure business and they know this is a show you'd enjoy. The gift may be seen as an attempt from the supplier to gain business from you, to the disadvantage of other tender participants.



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INTERACT RESPONSIBLY WITH HEALTHCARE PROFESSIONALS AND HEALTHCARE ENTITIES

We collaborate with Healthcare Professionals (HCPs) and Healthcare Entities (HCEs) to support business development efforts, share clinical experiences and product-related information.

We ensure that all our dealings are ethical, in appearance and in fact.

FIND OUT MORE

Interactions with Healthcare Professionals and Healthcare Entities Policy and supporting Procedures







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No, you cannot. The donation may be considered an inappropriate inducement for the endorsement of our products.

money to a charitable organisation in exchange for their endorsement

An HCP asked me to donate

of our products. Can I agree?



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DISCLOSE CONFLICTS OF INTEREST

We are expected to act in our company's best interests, which means we must never allow our personal interests to influence the actions we take on Reckitt's behalf.

FIND OUT MORE

Conflicts of Interest Policy

Conflicts of Interest Disclosure Register



CLICK HERE

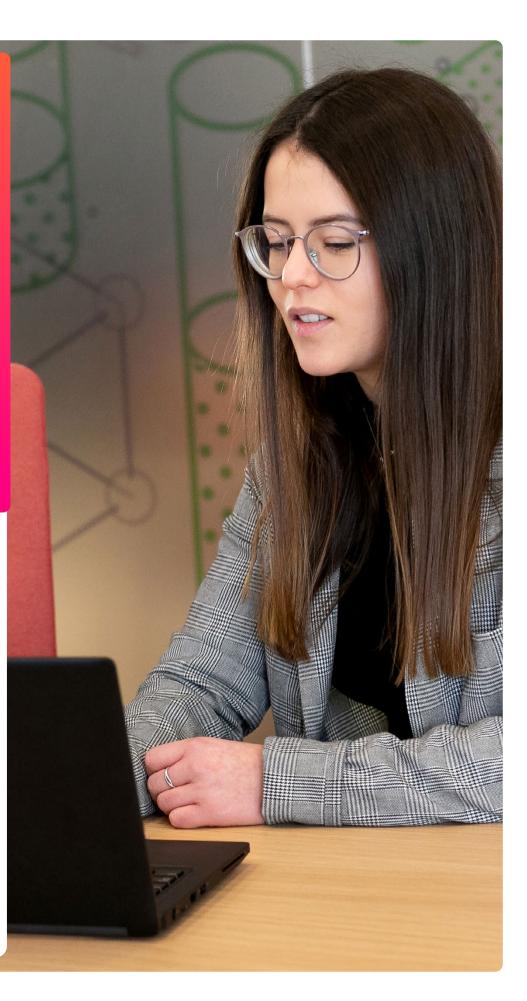
Your role

- Identify conflicts of interests by asking vourself:
- Am I using a company resource for a personal benefit?
- Do I have a relationship that may impact the decisions I make for Reckitt?
- o Would someone question my judgement, based on my activities outside work or my personal relationships?
- If the answer to any of these questions is 'Yes', you must disclose your situation in the **Conflicts of Interest Register**.

What if?

I need to hire drivers to deliver our goods to a customer, but I don't have time to run a tender. My cousin owns a courier company, can I ask him to help me out?

No. Since the firm is owned by your cousin, the situation poses a conflict of interest: it might look like you appointed this courier to benefit your family's fortunes. While you can reference your cousin's firm in a tender, you must not appoint it directly and must disclose your connection in the **Conflicts of** Interest Register.





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PRACTICE FAIR Competition

A free and competitive market serves us and our customers best.

To compete fairly, we do not share nonpublic information regarding pricing, costs or other sensitive matters with competitors, nor do we use our market position to illegally get a competitive advantage or block a competitor's market access.

FIND OUT MORE

Competition Law Policy







- Be cautious when interacting with competitors: do not discuss matters such as prices, terms of sale, market shares, etc., and disengage if the discussion goes in this direction.
- Never enter into any agreement to:
- Illegally fix or control prices
- Offer anti-competitive rebates, or other illegal incentives
- Not compete for certain business or bids
- Boycott specific suppliers or customers
- Divide or allocate markets or customers
- Do anything else that could limit competition



My friend sells infant formula at a competitor. As I look after Enfamil, she suggested we share the hospitals in our area to achieve our sales targets. Is it okay?

No, you must turn down this proposal immediately and report it to Legal.



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COMPLY WITH TRADE SANCTIONS

Sanctions are restrictions that apply to dealings with certain countries/territories, governments, groups, entities and individuals.

We comply with all applicable sanctions worldwide, including those regarding the import/ export of our products.

FIND OUT MORE

Sanctions PolicyCLICK HEREThird Party Compliance Risk
Management ProcedureCLICK HERE





- Perform due diligence on third parties to ensure they are not sanctioned.
- Immediately contact Legal if you suspect a third party may be sanctioned.





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ACT RESPONSIBLY TOWARDS OUR SHAREHOLDERS AND THE PUBLIC

We must not illegally profit from information which we hold through our roles at Reckitt.

Trading or encouraging others to trade on inside information or providing it to unauthorised persons is a criminal offence in many countries.

FIND OUT MORE

Share Dealings Policy

Speaking to the Media and Journalists Policy



CLICK HERE



Insider information

Insider information is information which is material, has not been made public, and would be likely to have a significant effect on the price of the company's securities if it were made public.



- Never buy or sell shares in Reckitt, any listed Reckitt subsidiary, or any other publicly traded company securities when in possession of inside information.
- Never encourage anyone to buy or sell securities of any listed company when you or they have inside information related to those securities.
- Never spread false information or engage in other activities to manipulate the price of publicly listed securities.
- Manage communications with investors and the media carefully, as set out here.









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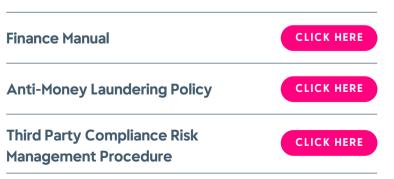
STRIVE FOR EXCELLENCE

MAINTAINING ACCURATE RECORDS

Our success depends on how well we manage our business.

Our records provide a picture of our business's health, so we all have a responsibility to ensure their accuracy and the legitimacy of our transactions.

FIND OUT MORE



Your role

ALWAYS:

ACT AS AN **ACCOUNTABLE OWNER:**

- Accurately record and maintain our company books and records.
- If your job requires you to disclose information to the authorities, ensure what you provide is complete, accurate, timely and understandable.
- Cooperate with auditors and Regulators on any review of our books and records.

SCRUTINISE OTHERS' ACTIONS:

- **Controls Team.**
- illegal activities.
- for review.



• Be alert to comments like: "Make the numbers work", "Hold that sale until next month so we can meet next guarter's target", etc., as these may indicate potentially illicit practices. Report these comments to the **Internal**

 Know our business partners and their role, in an effort to prevent

• Be alert to unusual patterns in our business partners' activities: red flags such as attempts to avoid record-keeping requirements should be reported to the Internal **Controls Team** and Legal Team

NEVER:

- Falsify, misreport or mischaracterize information that relates to our business.
- Mislead any shareholders, auditors, regulators or any other governing body.
- Accelerate or defer costs in violation of accounting principles.
- Manipulate or destroy information that may be needed for an investigation, an audit or a legal proceeding.



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SECTION 5

BUILD SHARED SUCCESS





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BUILD SHARED SUCCESS

RESPECT HUMAN RIGHTS

Respecting human rights is an absolute and universal requirement.

We are committed to respecting the fundamental human rights defined in the UN Universal Declaration of Human Rights and to uphold the principles of non-discrimination, elimination of child and forced labour, rights to collective bargaining and freedom of association laid down in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

FIND OUT MORE

Labour and Human Rights Procedure





- Uphold human rights and strive to make a positive impact through our activities.
- Be alert to and seek to identify human rights risks and adverse impacts that may arise through our activities.
- Report any incidents to the Sustainability Team.



I've just discovered that one of our suppliers is making their employees work excessive hours and isn't paying them overtime. What should I do?

Share your observations with the Sustainability Team, so that they may work with you and the supplier to reduce working hours (as per Reckitt's standards) and pay workers overtime at the required legal premium.







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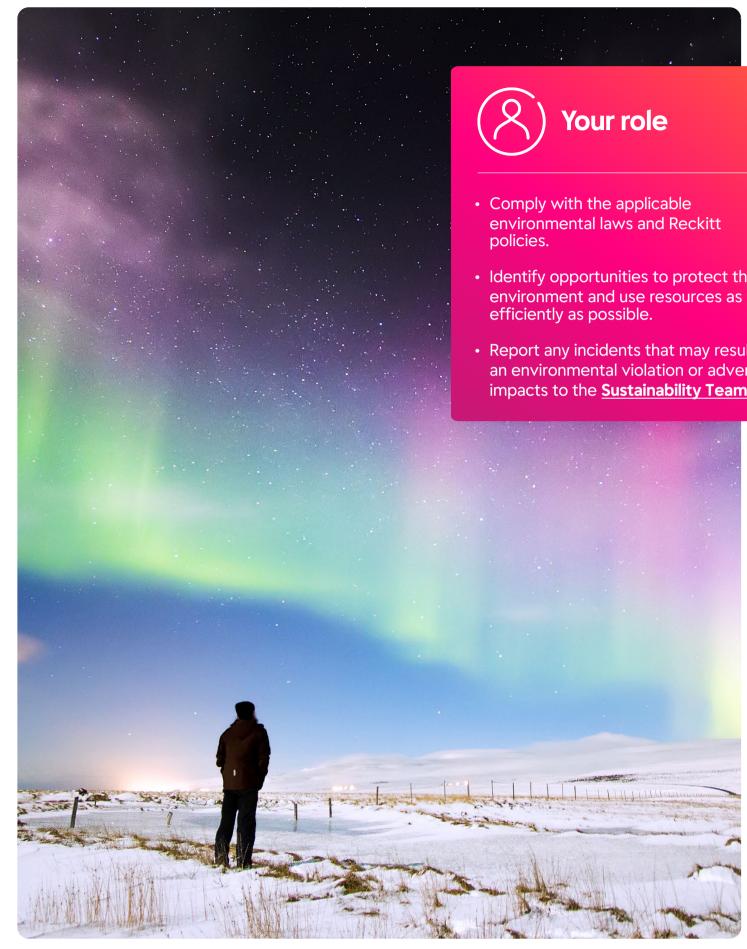
CARE FOR OUR PLANET

We conduct business in an environmentally responsible way.

We comply with the applicable environmental laws to minimise our environmental impact, address sustainability challenges and nurture the communities we operate in.

FIND OUT MORE







- Identify opportunities to protect the
- Report any incidents that may result in an environmental violation or adverse impacts to the Sustainability Team.



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Reckitt

The Code of Conduct is available in 26 languages on **Reckitt.com.**

Any waiver of our Code for Executive Officers or Directors may only be granted by the Board of Directors or a Committee of the Board and will be publicly disclosed when required by law.

We reserve the right to make unilateral changes to our Code or company policies at any time.

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