

# Corporate Policy

## THIRD PARTY CODE OF CONDUCT

Valid from:	<20.03.2025>
Next review:	<20.03.2028>
Policy Owner:	<Ethics and Compliance>

### Purpose and Scope

#### Purpose

At Reckitt, we believe that partnership is a good way to find solutions: that is why we aim to build trusted relationships with our Third Parties. Our Third Party Code of Conduct (the "Code") seeks to provide Third Parties ("you") with our high-level expectations regarding lawful behaviour and ethical conduct.

#### Scope

The Code is applicable to all Third Parties working with and on behalf of Reckitt. These include all of Reckitt's upstream and downstream business partners, such as: vendors, agents, suppliers, distributors, customers, joint venture partners and research partners, including entities hired by any of the above Third Parties on behalf of Reckitt (referred to as sub-contractors). Third Parties must ensure that sub-contractors comply with the Code.

While our Code sets out our expectations regarding our business partners' conduct, Third Parties must recognise that we operate in a complex environment, with legal requirements varying depending on where we do business. It is your responsibility to comply with the laws applicable to you.

### Policy Statement

At Reckitt, we exist to protect, heal and nurture in the relentless pursuit of a cleaner, healthier world.

Our success has been built through our unwavering commitment to Doing the Right Thing, Always. We expect our Third Parties to do business with the highest standards and to embrace our values to:

- put consumers and people first;
- seek out new opportunities;
- strive for excellence and
- build shared success.

This Code serves as a guide to translate our values into everyday behaviour and act lawfully and with integrity. We expect you to have policies and processes in place to comply with our Code and with the laws which govern our organisation. On our part - we follow a risk-based approach to evaluate Third Parties before doing business with them: as part of this process, we screen our Third Parties and assess



if any risk-mitigation actions need to be implemented in order to do business with them. Where this happens, we expect our business partners to fulfil the required risk-mitigation actions.

We take instances of malpractice or impropriety seriously. Should you know of or suspect non-compliance with this Code or any applicable Policies and Laws regulating our organisation, you have a duty to report them as per the escalation processes set out within this Code or via our [Speak Up Service](#) (which grants confidentiality and, if you so choose, anonymity). Non-compliance may result in our business relations with you being terminated, in litigation or in any other actions such as reporting the matter to government agencies or regulators as applicable.

We expect our partner Third Parties to:

### Deliver Safe, Regulatory Complaint and High-Quality Products

We are committed to ensuring that consumers can trust the safety of our products. It is your responsibility to ensure that products supplied to Reckitt meet our specifications, quality and safety criteria, local standards and are safe for their intended use. You must not make changes or modifications to products supplied to us (including source of or nature of materials used in their manufacturing process, or procedures involved in their development) without our prior, written consent. You must report product safety and quality issues to Reckitt within 24 hours of becoming aware of them.

To guarantee we are supplying high quality products to our customers, we have zero tolerance for counterfeiting. You must have adequate controls in place to monitor for counterfeiting and other unlawful activities within your organisation and in your supply chain.

Reckitt will take appropriate action where a Third Party is found to be involved in the manufacture, supply or distribution of counterfeits or unauthorised parallel imports.

### Communicate Responsibly with our Consumers

All our marketing communications and activities are i) guided by our [Responsible Marketing Principles](#) and compliant with our [Responsible Marketing Policy](#); ii) adhere to our Infant & Child Nutrition Pledge and our [Policy on the Marketing of Breast-Milk Substitutes](#); iii) compliant with our [Policy on Interactions with Healthcare Professionals \(HCPs\) and Healthcare Entities \(HCEs\)](#); and iv) guided by our [Responsible Consumer Data Principles](#) if involving consumer data.

When working in relation to Reckitt's marketing communications and activities, you must understand and follow the policies above, only utilise the most up-to-date materials if marketing our products and never promote off-label use or unlicensed products.

### Value Uniqueness and Consciously Include

We are committed to embracing diversity, promoting inclusion among our workforce and eliminating unlawful discrimination. We require you to uphold these values and:

- Treat others respectfully, fostering an inclusive environment, free from intimidation, bullying, harassment and violence.
- Never engage in or support bullying, harassment or discrimination based on any protected characteristics, including but not limited to age, disability or medical condition; colour, ethnicity, race, citizenship, and national origin; religion, faith; pregnancy, family status and caring responsibilities; sexual orientation; sex, gender identity, gender expression, and transgender identity; protected veteran status; size or any other basis protected by appropriate law.

### Provide Safe and Healthy Working Conditions

You are expected to provide a safe and healthy workplace environment including access to clean, safe and reasonable working conditions, meeting at least the minimum local legal requirements. Take

reasonable care for the health and safety of your personnel and of others who may otherwise be affected by unsafe acts or omissions.

### Safeguard our Proprietary and Confidential Information

In the course of business, you may gain access to proprietary or confidential information belonging to us or our employees, consumers, customers, suppliers or others. You must only use such information for its intended purposes and as part of your duties. This means that you must:

- Always protect confidential information and adopt information security controls that meet our requirements and follow the confidentiality safeguards outlined in your contract with us.
- Not disclose confidential information to anyone inside or outside of Reckitt, except if required by law or for a specific and proper business purpose.
- Undergo security assessments and allow us to review security audits/ assurance reviews.
- Exercise due care to avoid misuse, theft, loss or unauthorised disclosure of any confidential or proprietary information. Written consent must be obtained before sharing stated information (unless otherwise required by law).

### Protect Personal Data

We are committed to protecting the personal data of our consumers, employees and others we do business with. We handle personal data with care ensuring it is collected, used and stored responsibly. We expect you to:

- Comply with all applicable data protection laws and regulations.
- Comply with the data protection and cyber security obligations outlined in your contract with us. You must also ensure any sub-contractors you work with comply with the same obligations.
- Notify **Reckitt** in the event of any data breach, complaint, or data request, without undue delay and no later than 24 hours from identification.

### Communicate Responsibly

You must not act or speak on our behalf or express views attributable to Reckitt unless you've been authorized in writing to do so. Any such authorisation assumes that you will provide accurate, clear, complete, and consistent importation which is necessary to maintain stakeholder trust.

### Acting with Integrity

A bribe is the offering, promising, giving, accepting, agreeing to receive or requesting of a financial or non-financial advantage or anything of value (including payments, gifts, hospitality, donations, confidential information etc):

- To induce or reward the recipient or any other person for acting improperly in the performance of their functions; or
- Where receiving the advantage would itself be an improper performance of the recipient's function.

We have zero-tolerance for bribery and corruption and only partner with Third Parties who act with integrity and comply with anti-bribery laws. You must never offer, promise, give, accept, agree to receive or request a bribe or anything which may be viewed as a bribe either on your own behalf or on behalf of Reckitt, directly or indirectly, through any agent.

Reckitt personnel are prohibited from giving and accepting gifts and hospitality that may impact business/administrative decisions and expects our partner Third Parties to also refrain from offering such gifts and hospitality to Reckitt personnel.

Exercise caution when dealing with people in a position of power, like Public Officials<sup>1</sup>, and ensure your actions are legitimate and ethical.

### Interact Responsibly with Healthcare Professionals (HCPs) and Healthcare Entities (HCEs)

Interactions with HCPs and HCEs that involve any transfer of value (e.g., payment for service, sponsorships, grants or any other exchange of goods or services) could be perceived as an inducement or a bribe. It is your responsibility to mitigate these risks by following the relevant Reckitt policies and the applicable local regulation.

The provision of gifts, hospitality, donations, sponsorships, grants, samples, or products for professional evaluation to HCPs and HCEs (if permissible) on our behalf may only be incurred if previously contracted by Reckitt under the relevant policies, and must be recorded, with proof provided to Reckitt upon request.

### Disclose Conflicts of Interest

You must identify any situations that could interfere with your ability to act objectively and perform your job for Reckitt impartially. We regard these situations as 'conflicts of interest': you must report them to Reckitt for evaluation as soon as they arise, and before engaging in any conduct that might breach your duties towards Reckitt.

### Acting with Integrity and Countering Economic Crimes, Tax Evasion and Money Laundering

We are fully committed to preventing economic crimes, including money laundering<sup>2</sup>, facilitation of tax evasion<sup>3</sup> and terrorist financing<sup>4</sup>. We only conduct business with third parties involved in legitimate business activity, whose funds are not derived from or channelled to illegitimate sources or resulting from tax evasion. You must not provide any service or enter into any transaction that facilitates or may constitute us being involved in economic crimes.

### Practice Fair Competition

Your business activities must occur in full compliance with fair competition and anti-trust laws. You must not share commercially sensitive information with your or Reckitt's competitors regarding your trading terms with us, such as price, costs, product supply, current or future marketing or other commercial strategies.

You must not attempt illegally influence the legitimate activities of your competitors.

### Comply with Sanctions

You must comply with all applicable laws or regulations in the countries you operate in relating to export controls, trade restrictions or embargoes, trade, economic or financial sanctions that restrict certain activities with or within certain countries, entities, or individuals worldwide. If you become aware of, or suspect, a sanctions violation, you must report them to [Reckitt](#) immediately.

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<sup>1</sup> Public Officials may include, non-exhaustively, any officer, employee or representative of a government or a government-owned entity; any legislative, administrative or judicial official; any officer of, or individual who holds a position in, a political party; any candidate for political office; any person who otherwise exercises a public function for or on behalf of any country. If you are in any doubt as to whether a person is a Public Official, please contact Ethics & Compliance.

<sup>2</sup> Money laundering is defined as the exchanging money or assets obtained criminally for money or other assets that are 'clean'. This also includes money that is used to fund terrorism however it's obtained.

<sup>3</sup> Tax evasion is the illegal non-payment or underpayment of tax. This includes the failure to prevent the criminal facilitation of tax evasion.

<sup>4</sup> Terrorist financing is assisting with the financing of terrorism.

## Act Responsibly towards our Shareholders and the Public

You may gain access to unpublished inside information in relation to Reckitt, our operations, our customers, suppliers or business partners. Inside information is information which relates directly or indirectly to Reckitt or any Reckitt securities; has not been made public; and would likely affect the price of the company's securities if it were made public. We do not tolerate the disclosure of or trading in Reckitt securities when in possession of inside information. You must comply with insider dealing and securities laws at all times. You are strictly prohibited from using such information for your personal benefits or disclosing it to other people, including family and friends. You are also prohibited from using inside knowledge to trade in Reckitt securities.

## Maintaining Accurate Records

You must document your transactions properly and honestly and retain accurate books and records regarding your business activities, without falsification or misrepresentation, in compliance with all applicable Laws and accounting principles. You are expected to make relevant documentation available to Reckitt, as well as to investigators or law enforcement agencies, for inspection during audits, investigations or if required in response to data requests.

## Respect for Human Rights

Human rights are a 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 as outlined [here](#), and meet our [Sourcing for Sustainable Growth Policy](#), and [Labour and Human Rights Standard](#) requirements. We require you to uphold human rights and:

- Compensate personnel fairly for their work, including minimum wages, overtime hours and mandated benefits, meeting at least the minimum legal requirements
- Ensure workers are entitled to breaks, limited working hours and paid leave, in line with local Laws.
- Never use forced or child labour. All workers must be above 15 years of age or the legal minimum age for work in the local jurisdiction, whichever is higher.

We are committed to eradicating modern slavery in our supply chain and as such you, too, are expected to have zero tolerance towards slavery, servitude, forced labour and human trafficking.

## Care for Our Planet

We are committed to reducing the environmental impact of our products and operations and expect our Third Parties to do the same. You must comply with all applicable environmental laws, meet our [Sourcing for Sustainable Growth Policy](#), [Environmental Protection Standard](#), [Sourcing Forrest Commodities](#), [Palm Oil Grievance Procedure](#) and the [Natural Raw Materials Sourcing Standard](#), and to devote the necessary resources to implement systems, controls and procedures to minimize their environmental impact in a continuous manner.

## **Support for Third Parties**

We may waive specific requirements of this Code in special circumstances (i.e., when you have a demonstrably strong compliance programme in place, or when your Code has been deemed to contain equivalent or more stringent provisions than those we adopt in Reckitt). Such decisions must be approved in writing by our Legal team.

Whilst we hold you to high standards, we also recognize that we have a responsibility to help you implement and maintain those standards. That's why we've made available to you [training on the content](#)

of this [Code of Conduct](#) as well as [role-specific training for our intermediaries](#). Our team also remains at your disposal, in case of queries or need for support.

## Revision & Approval History

### Revisions

Issued / Revised	Version	Effective Date	Summary of Key Changes
1	1	April 2021	Updating of Third Party Code of Conduct to reference Reckitt's new Compass and to include provisions on Anti-Counterfeiting.
2	2	March 2025	Updating of Third Party Code of Conduct to make it more succinct and include references to updated Policies, Procedures and points of contact.

### Approval History

Role	Name	Title	Date of Approval
<b>Author</b>	Ariadna Grañena	Ethics & Compliance Director	n/a
<b>Owner</b>	Geoffroy Ribadeau Dumas	Chief Ethics and Compliance Officer & SVP Legal	n/a
<b>Approver</b>	Kris Licht	Chief Executive Officer	18.03
<b>Approver</b>	Cathy O'Rourke	Group Company Secretary	18.03
<b>Approver</b>	Ranjay Radhakrishnan	Chief HR Officer	18.03
<b>Approver</b>	Shannon Eisenhardt	Group CFO	18.03
<b>Approver</b>	Harald Emberger	Chief Supply Officer	18.03
<b>Approver</b>	Angela Naef	Chief R&D Officer	18.03
<b>Approver</b>	Ryan Dullea	Chief Category Growth Officer	18.03
<b>Approver</b>	Jérôme Lemaire	President North America	18.03
<b>Approver</b>	Susan Sholtis	President Head Johnson Nutrition	18.03
<b>Approver</b>	Eric Gilliot	President Europe	18.03
<b>Approver</b>	Nitish Kapoor	President Emerging Markets	18.03
<b>Approver</b>	Sheila Redzepi	Chief Communications and Corporate Affairs Officer	18.03