

# CORPORATE POLICY










## Sanctions Policy

v.2 [Final]

Valid from: <01/05/2023>

Next review: <01/05/2026>

Policy Owner: <Legal and Compliance>

Do's	Don'ts
<p> Run Third Party Due Diligence checks before onboarding new third parties &amp; renewing contracts. Do this on banks too.</p> <p> Follow Legal and/or Finance's instructions on suspending payments as needed.</p>	<p> Start third party engagements or renew contracts without having i) A prior Third Party Due Diligence check and ii) Ethics &amp; Compliance's approval to engage.</p> <p> Pay sanctioned third parties or banks if advised against it by Legal/Finance.</p> <p> Accept payments by Sanctioned parties.</p>
<p> Liaise with Legal if you're asked to sign a contract, indemnity, guarantee or a commitment with a third party that could involve dealing in sanctioned countries or territories, restricted goods or services on involving a sanctioned individual.</p> <p> Consult with Legal and obtain the necessary approvals from the GBU Presidents, CFO and SVP Legal, if you are intending to do business that could involve a sanctioned country or territory, restricted goods or services or involving a sanctioned individual.</p>	<p> Sign a contract, indemnity, guarantee or a commitment with/to a third party that could involve dealing i) in sanctioned countries or territories, ii) restricted goods or services or iii) involving a sanctioned individual without prior sign off from the local Legal Director.</p>
<p> Engage Legal whenever dealings could involve sanctioned countries or territories, sanctioned persons or restricted goods or services. Obtain Legal's approval over the proposed activity and import or export of Reckitt's products overseas.</p>	<p> Make any investments that could involve sanctioned country or party without prior approvals from the GBU Presidents, CFO and SVP Legal.</p>

## Purpose and Scope

### Purpose

Sanctions are government restrictions applicable to dealings with certain countries/ territories, governments, groups, entities, individuals, or controlled goods or services. The nature and extent of these restrictions may vary; typically, they include limitations on import/export; controls on specific goods and services; restrictions on financial operations; and/or bans on engaging with sanctioned third parties (including banks) or with entities owned by sanctioned individuals.

This Policy outlines our responsibility to comply with sanctions laws globally.

### Scope

The principles and obligations outlined in this Policy apply to all Reckitt operations globally, including all legal entities worldwide owned, managed or otherwise controlled by Reckitt, and to all directors, officers, employees, contractors and other third parties acting on behalf of these entities.

## Policy Statement

You must comply with all applicable sanctions and must not engage in any business that could violate them. Sanctions may affect:

- Where we do business: we must not do business in restricted countries or territories that would violate sanctions.
- How we do business: we must not circumvent, evade or facilitate the contravention of sanctions.
- Who we do business with: we must not do business with third parties and individuals on a sanctions list.

You should also be mindful that sanctions apply to individuals, not just entities. For example, UK, EU and US nationals must be aware of the sanctions applicable to them, in addition to those applicable to Reckitt; as such, they must exercise particular care and seek legal advice before working with sanctioned countries, territories or individuals. Regulators typically take a zero tolerance approach to breaches of Sanctions, even if you were not aware that you were breaching them.

### Compliance controls

We are all responsible for complying with sanctions laws:

- Local Legal must regularly monitor the evolution of sanctions laws and update the business in case of changes.
- Anyone engaging with third parties must follow the Third Party Compliance Risk Management Procedure. Where a sanctions risk is identified, those engaging with third parties must obtain Ethics & Compliance's approval to engage before signing a contract; they must also ensure that they are compliant with this Policy, perform

ongoing screening on the implicated third party and check for red flags throughout the course of the third party engagement.

- Employees must comply with all relevant sanctions. Those intending to do business that could involve sanctioned countries or territories, restricted goods or services on involving a sanctioned individual must contact Legal to confirm the proposed activity will not violate sanctions and obtain the necessary approvals from the GBU Presidents, CFO and SVP Legal.
- Where sanctions restrictions are imposed on financial institutions, Finance is responsible for ensuring that banks undergo the necessary Third Party Compliance Risk Management procedures before transferring funds to (or receiving payments) from them. Finance is also responsible for ensuring that the Group complies with sanctions related to prohibited currencies. Should Reckitt receive funds from sanctioned banks or sanctioned third parties, the funds should be put in a segregated account on receipt.

## Red flags

The following red flags may indicate breaches of sanctions, and as such must be reported to Legal as soon as they are identified:

- Any indication that Reckitt's products will be shipped to/ through sanctioned territories.
- Any indication that Reckitt is doing business with a sanctioned entity or individual (as determined by following the [Third Party Compliance Risk Management Procedure](#)). Examples include finding out that a third party has sub-contracted their services to a sanctioned entity or is owned in part by a high-profile individual who has been sanctioned.

## Contact Information

If you are ever in any doubt about the right course of action, or if you have questions about this Policy, please consult a member of the [Ethics & Compliance Team](#).

## Appendix 1

[List of Sanctioned Countries and Territories.](#)

## Revision & Approval History

### Revisions

Issued / Revised	Version	Effective Date	Summary of Key Changes
Issued	1	July 2018	Version 1
Revised	2	May 2023	Included detailed description of Reckitt's controls for Sanctions' compliance.

### Approval History

Role	Name	Title	Date of Approval
Author	Martina Algeri	Ethics & Compliance Director	N/A
Owner	Richard Walker	Group Chief Ethics and Compliance Officer	N/A
Approver	Nicandro Durante	Chief Executive Officer	20 <sup>th</sup> April 2023
Approver	Cathy O'Rourke	General Counsel	20 <sup>th</sup> April 2023
Approver	Jeff Carr	Group CFO	20 <sup>th</sup> April 2023
Approver	Ranjay Radhakrishnan	Chief HR Officer	20 <sup>th</sup> April 2023
Approver	Sami Naffakh	Chief Supply Officer	20 <sup>th</sup> April 2023
Approver	Angela Naef	Chief R&D Officer	20 <sup>th</sup> April 2023
Approver	Filippo Catalano	Chief Information Officer	20 <sup>th</sup> April 2023
Approver	Fabrice Beaulieu	Chief Marketing, Sustainability and Corporate Affairs Officer	20 <sup>th</sup> April 2023
Approver	Volker Kuhn	President, Hygiene	20 <sup>th</sup> April 2023
Approver	Patrick Sly	President, Nutrition	20 <sup>th</sup> April 2023
Approver	Kris Licht	President, Health	20 <sup>th</sup> April 2023