

# RB Code of Conduct





RB's Code of Conduct

Caring for our Consumers

Caring for each other

Caring for our world

Communication with Care

Acting with Integrity

Closing message

# Integrity & Respect...



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# Letter from Laxman

**The purpose of RB's Code of Conduct is to ensure each one of us has a clear understanding of the principles and ethical values that RB wants to uphold. Making good decisions and ethical choices in our work builds trust in each other and with our consumers, customers and partners.**

My expectation is that each one of us always acts in accordance with our Compass, responsibly and with integrity. In RB we should never compromise the company's reputation and trust in exchange for any short-term gain.

Compliance with our Code of Conduct is essential for maintaining and building the reputation of RB as a responsible and trustworthy corporate citizen. RB leaders and managers should foster a culture where employees feel free to ask questions and raise concerns when something doesn't seem right.

I am confident that by abiding by the principles set out in this Code and our Compass, we can fulfill our Purpose and succeed in our Fight.

Sincerely,

Laxman

Chief Executive Officer

Watch the video ▶



## Our Purpose:

To protect, heal and nurture in the relentless pursuit of a cleaner, healthier world

## Our Fight:

Making access to the highest quality hygiene, wellness and nourishment a right, not a privilege.



# Our Compass

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## Our Purpose

To protect, heal and nurture in the relentless pursuit of a cleaner, healthier world

## Our Fight

Making access to the highest quality hygiene, wellness and nourishment a right, not a privilege

## Build shared success

### Put consumers and people first

We put people's lives and needs at the heart of our business.  
We listen to **consumers** to better serve and enhance their lives.  
We act as **accountable owners**.  
We value **diversity** and invest in our **people** to give them the '**Freedom to Succeed**'.

### Do the right thing. Always.

We act responsibly and with integrity.  
Doing right for the world is what's **right** for our business.

Good can always be bettered.  
We win at '**points of choice**' with better products; better design; better consumer experiences; better service; and better value.

### Strive for excellence

### Seek out new opportunities

We seek out new **opportunities**, putting our entrepreneurial spirit to good. We are entrepreneurs, working smarter and leaner. We fearlessly innovate. We create our own opportunities. We learn. We move with ambition and at pace. Our goal is clear, our energy is infinite.



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## Who does the Code of Conduct apply to?

**This Code of Conduct is applicable to all employees of RB companies globally, members of RB's Board of Directors, RB's contractors (which include agents, consultants, outsourced personnel and other representatives) and any joint ventures in which RB takes part.**

Additionally, we have developed a specific Code of Conduct for Third parties to let them know what are we expecting from them when working with RB. You can find this document on Rubi and on RB's public website.

**Third parties Code of Conduct**

We expect our third parties to act fairly and treat others with respect, to look for opportunities to improve products and to innovate responsibly for results. We expect them to always behave ethically and in accordance with RB values, policies, procedures and applicable laws.





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# Taking good decisions

## How you can use this Code of Conduct to make good decisions?

Making good decisions and ethical choices is critical to our business, builds trust with customers, consumers and between each of us and the people we interact with. In our constantly changing and diverse global environment, not all situations you encounter are straightforward—how do you make the best choice when facing difficult or unclear circumstances? How do you navigate ethical dilemmas?

**While this Code of Conduct cannot tell you exactly what to do in every situation, it serve as a guide to help you make good decisions and navigate complex situations where the answer might not always be clear.**



## When faced with difficult decision or situation follow these steps:

### Pause

- Does a situation make you feel uncomfortable?
- Are your instincts telling you something is not quite right?
- Pause before acting and reflect on how you should approach the situation.

### Reflect

- Is this action the right thing to do?
- Is your action or decision aligned with this Code of Conduct, RB policies or all relevant laws or regulations?
- Would you be okay if your action was reported in the media? Would you be comfortable explaining your behaviour to your family and friends?

### Ask

- Whenever in doubt raise your concerns and get help. Talk to your manager, HR or to the Compliance team. With them you can find the help you need to take the right decision.

[Ethicsandcompliance@rb.com](mailto:Ethicsandcompliance@rb.com)



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## RB Leaders and Managers

**RB leaders and managers have responsibilities for setting the culture of ethical business practices and a trustworthy work environment. The way you make decisions, handle concerns, different opinions and even bad news, will set the foundation for trust within your team. Remember that the success of your team depends on the trust you build together. The best way to lead, is setting the right example.**

**Here is a short guide you should use to build a culture of ethics and integrity in your team:**

**Talk to your team about ethics and integrity.** Be clear that RB is expecting their work is to be done ethically and in compliance with applicable policies, laws and regulations.

**Be open and listen** to your team with respect, even when they have something difficult to tell you.

**Lead by example** by demonstrating how you take ethical decisions.

Explain to your team that for **results** to matter, they **must be achieved the right way**. In RB all of us are accountable for complying with this Code. If you are unsure how to approach an issue or whether it merits escalation, talk to your local Compliance team.





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# Caring for our Consumers

**All of RB's products are sold based on their quality, efficacy, safety and price. Advertising and labelling on our packaging, as well as on all other RB communications, must be ethical, truthful, and specific claims must be fair and substantiated.**

Marketing materials of our products must be reviewed and approved before they are used to check if they comply with applicable policies and local and international regulations.

You should always follow the established processes for obtaining legal and regulatory approval before executing marketing activities.

## Infant and child nutrition

Our Infant and Child Nutrition business is a key pillar in delivering on our purpose to protect, heal and nurture in the relentless pursuit of a cleaner, healthier world. We were proud to publish our Breast-Milk Substitute Marketing Policy effective on 30 April 2018.

This guideline outlines our marketing practices to ensure we support a mother's choice and ability to breastfeed her infant in line with the World Health Organization's recommendations.

Local law and applicable rules regarding Infant and Child Nutrition promotional practices should be observed to ensure full compliance with mandatory regulations.



## Marketing activities

All of RB's products are sold based on their quality, efficacy, safety and price. Advertising and labelling on our packaging, as well as on all other RB communications, must be ethical, truthful, and specific claims must be fair and substantiated. Marketing materials for our products must be reviewed and approved before they are used to check if they comply with applicable policies and local and international regulations. You should always follow the established processes for obtaining legal and regulatory approval before executing marketing activities.



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## Product quality and safety

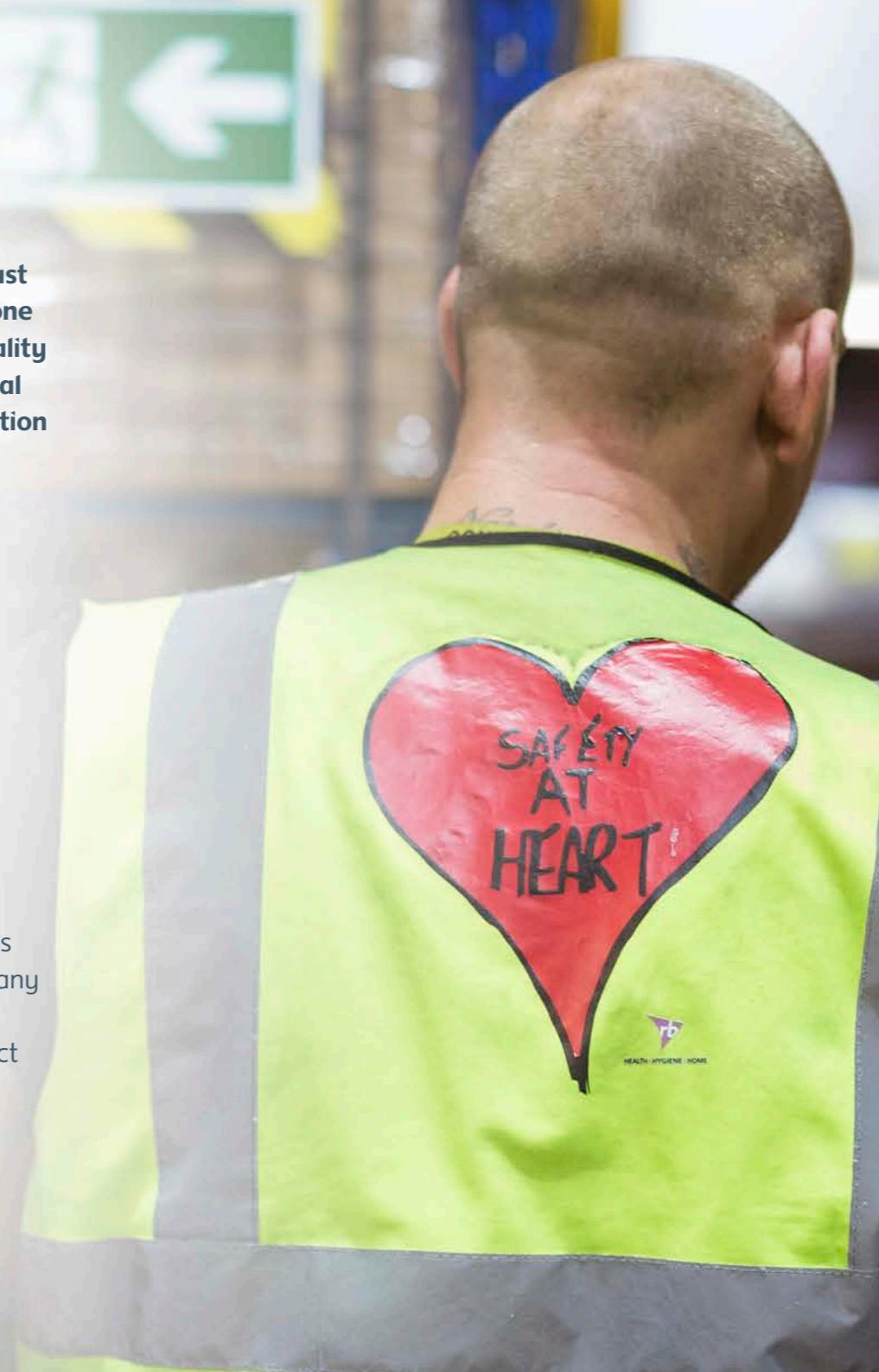
In RB we are committed to ensuring that consumers can trust the safety of our products. It is the responsibility of every one of us to make sure that our products meet our rigorous quality standards and are safe to use. Product safety is fundamental to RB's brands, business and long-term success. RB's reputation is reflected in every product we promote and sell.

### Reporting Consumer Adverse Events, Safety Concerns and Quality Events

The health and well-being of our consumers is our number one priority, so both the quality and safety of our products are paramount.

For this reason, it is your responsibility to report, within 24 hours of awareness, any feedback received indicating dissatisfaction related to the use of any of RB's products, including safety, quality or performance to your local safety/quality team or Drug Safety Officer.

These reports may come to our attention in a variety of ways including social media, media, face to face conversations or any other route. Any statement or comment from any person or institution suggesting that they are dissatisfied with a product must be forwarded to the contacts below.



When you are made aware of an Adverse Event with any of the Reckitt Benckiser products; we ask for four essential details of the event to be recorded, these details are referred to as 'P.R.E.P', described as follows:

- (P)atient Details: Age, initials and gender (one of either is usually sufficient).
- (R)eporter Contact details: Profession, telephone number, address.
- (E)vent Details: Brief description of event(s) (e.g. patient became sick and dizzy).
- (P)roduct: RB product name (exact brand name, if possible).

[Go to the SQRC website](#) ▶



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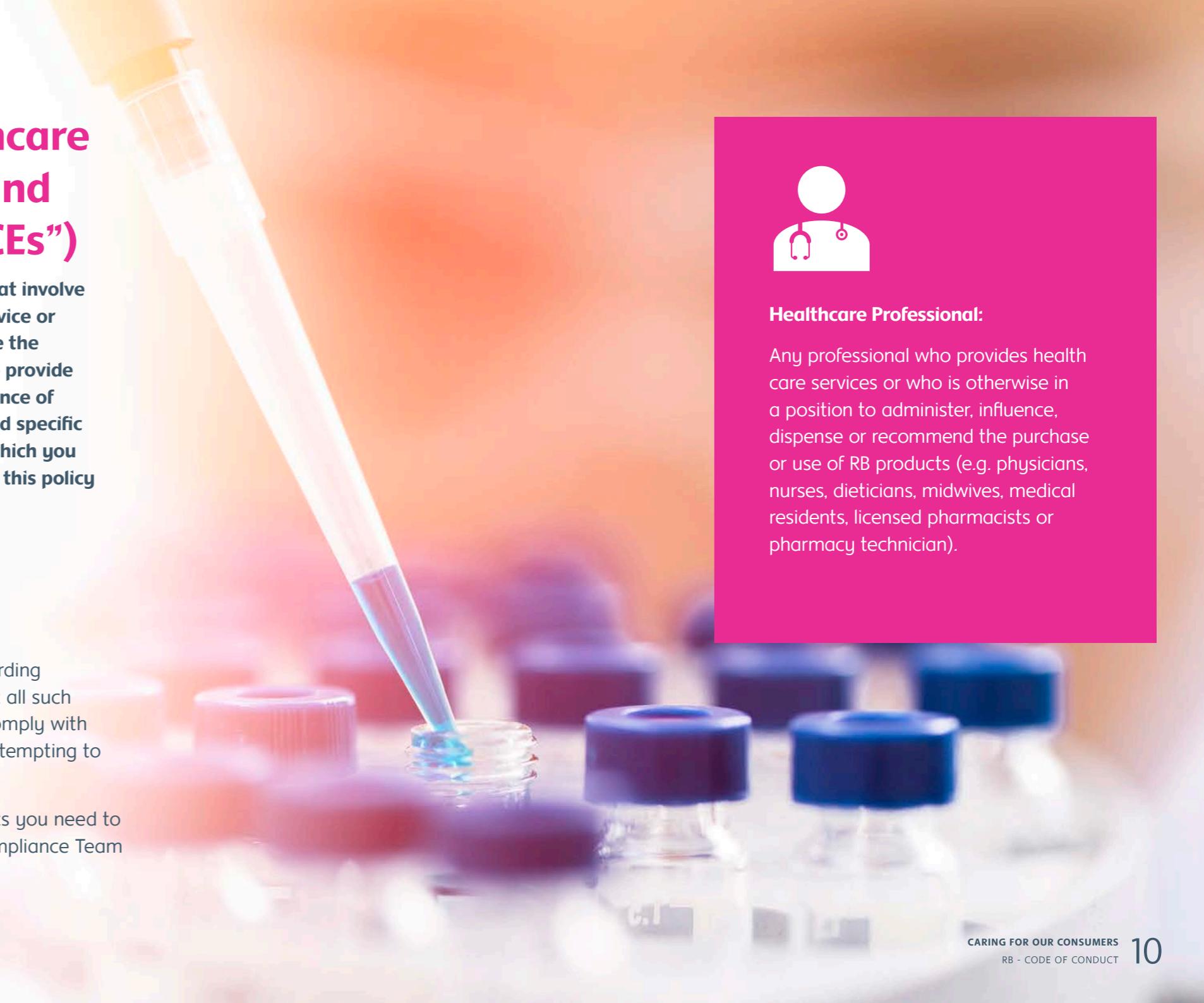
# Interactions with Healthcare Professionals (“HCPs”) and Healthcare Entities (“HCEs”)

Interactions HCPs, HCEs and government officials that involve transferring anything of value (e.g. payment for service or sponsorships for attending educational events) have the risk of being perceived as an inducement or bribe to provide an advantage to RB. In RB we recognise the importance of responsible behaviour, as a result we have developed specific policies about interactions with HCPs and HCEs to which you should adhere. Take some time to learn more about this policy and go to the following link:

**Corporate Policies**

You should also be aware of your responsibilities regarding interactions with government officials and ensure that all such interactions are honest and ethical. Our policy is to comply with all applicable laws, rules and regulations relating to attempting to influence government officials.

In case you have any doubts on the local requirements you need to follow, please contact a member of the RB Health Compliance Team for additional guidance.



## Healthcare Professional:

Any professional who provides health care services or who is otherwise in a position to administer, influence, dispense or recommend the purchase or use of RB products (e.g. physicians, nurses, dieticians, midwives, medical residents, licensed pharmacists or pharmacy technician).



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# Caring for each other

**RB is committed to providing you with a safe and healthy working environment. You have the duty to take reasonable care for your own health and safety and that of others who may be affected by their acts or omissions.**

Employees and contractors must use all work items provided by RB correctly, and in accordance with the training and instructions they received to use them safely.

You must never use drugs, alcohol or other substances in a way which may adversely affect your ability to perform your job safely. While acting as a representative of RB, you should never possess drugs or other substances on RB premises which you are not authorised to possess, nor should sell, exchange or purchase drugs or illegal substances.





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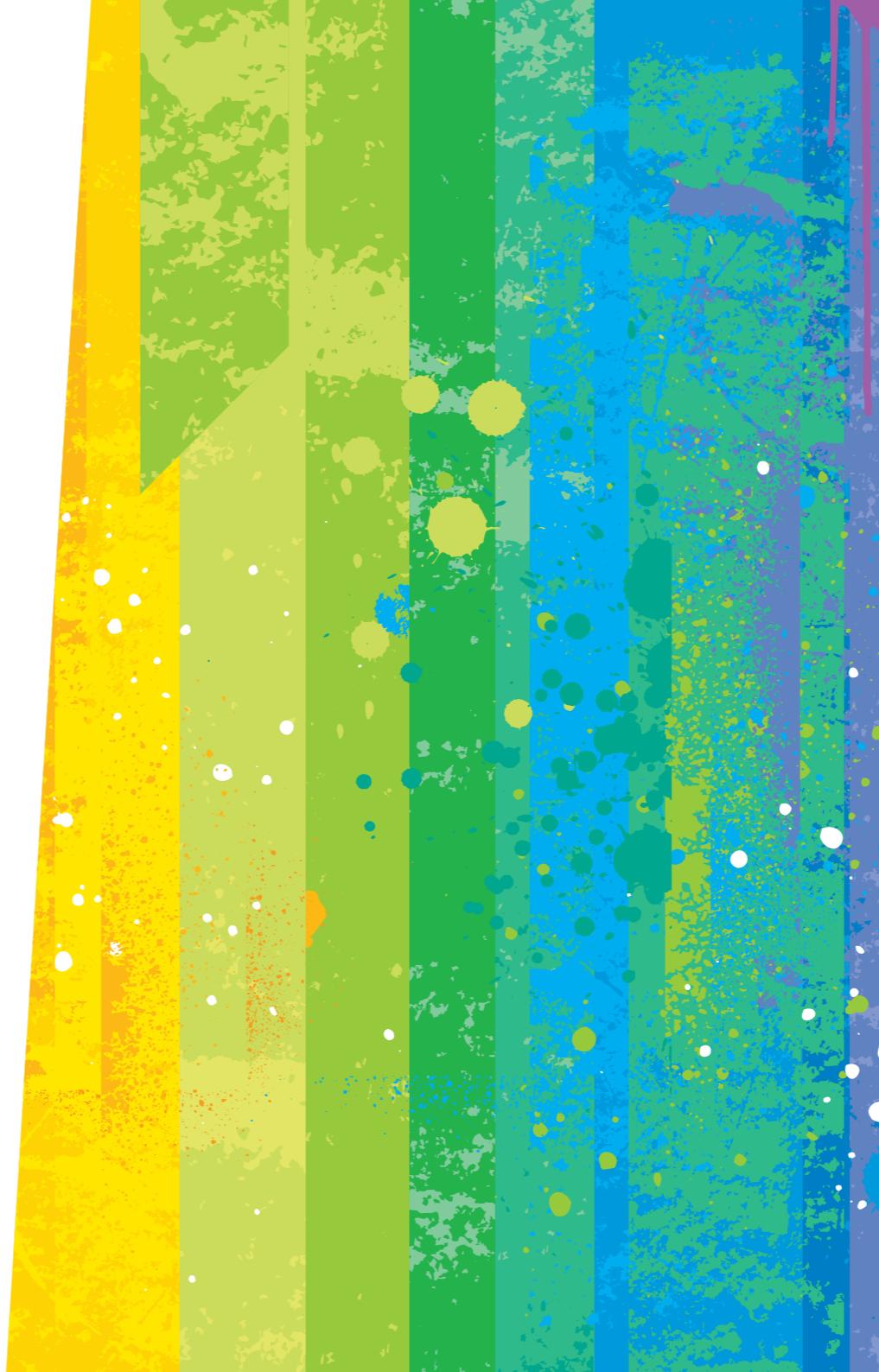
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## Diversity and Inclusion

RB leaders and managers have additional responsibilities for setting the culture of ethical business practices and a trustworthy work environment. The way you make decisions, handle concerns, different opinions and even bad news, will set the foundation for trust within your team, remember that the success of your team depends on the trust you build together. The best way to lead, is setting the right example.

We are committed to equal opportunities among all our employees. We will not tolerate any kind of discriminatory behaviour based on race, colour, language, caste, national origin, indigenous status, religion, disability, gender, marital status, sexual orientation, union membership, political affiliation, pregnancy, veteran status, age or any other characteristic protected by law.



## No to harassment!

In RB you have the right to work in an environment that is free of any form of intimidation, harassment, violence or threats of violence. Any act or threat of violence, and any verbal or physical conduct that creates an intimidating, offensive, abusive or hostile work environment is unacceptable and is taken extremely seriously.

Unwelcome sexual advances, requests for sexual favours, and other unwelcome verbal or physical conduct of a sexual nature are strictly prohibited.

Failing to follow this standard could lead to disciplinary action up to and including termination of employment, as well as police involvement and subsequent criminal prosecution. Employees should report any form of harassment they have been subject to or witnessed.



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# Speak up

To build a strong culture of trust, RB needs you to speak up when something is not right, so that we can address the problem and find the right solution. You do not need to have conclusive "proof" or absolute certainty that something is wrong to make a report. A reasonably-held belief or concern is enough. You can trust that we will take your report seriously, fairly and act promptly.

## No Tolerance for Retaliation

We know it takes courage to speak up when something is not right. In RB we will never tolerate retaliation against anyone who has reported a concern in good faith. Retaliation may include threats, violence, harassment, demotion or any other form of discriminatory behaviour. Anyone who engages in retaliation will be subject to disciplinary action, up to and including termination of employment and potential legal action.

[www.rbspeakup.com](http://www.rbspeakup.com)



## Report your concern

We have worked to provide you easy ways to report your concerns. Here are the options you have to report, choose whichever feels better for you, we will protect your confidentiality and if requested, anonymity as well:

- In person. Raise your concern to your manager, your HR business partner or to a member of the Legal or Compliance Teams
- Web: [www.rbspeakup.com](http://www.rbspeakup.com)
- Phone: please refer to the international toll free lines available at the Speak Up website that you can find in Rubi



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## How Managers should handle concerns?

**If someone comes to you with a concern, you have a special responsibility to listen and act. Please take the following steps:**

- Remove distractions and **listen carefully**. Thank the person for Speaking Up, remember that they've just done something difficult and very important for RB.
- Respond **respectfully** and take every concern **seriously**, even if you disagree. Show that you are committed to solving the problem.
- Take steps to protect the person's **confidentiality** - avoid discussing the conversation with others on your team.

As a manager, while you should feel empowered to resolve performance issues yourself, you must escalate integrity concerns about business ethics or misconduct to the Compliance Team. If you have a question or are not sure whether you can or should resolve the issue yourself, you can always contact the Compliance team for advice.

Email [ethicsandcompliance@rb.com](mailto:ethicsandcompliance@rb.com)



## Disciplinary Actions

**In RB we are all required to comply with this Code of Conduct. When necessary, RB may take disciplinary actions, up to and including termination of employment, against any individual who:**

**Participates in a violation of this Code, the law, or any RB policies or procedures;**

**Retaliates against a person who reports a suspected violation; or**

**Improperly or negligently supervises a person who commits a violation;**

**Fails to cooperate in any investigation into a potential violation.**



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# Caring for our world

## Human rights

We believe that human rights are a universal requirement and RB is committed to upholding those rights expressed in the International Bill of Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.

We recognise the important role that business plays in society and the responsibility we have in helping to ensure human rights are respected. RB's commitment to human rights is set out in RB's publicly available policy on human rights and responsible business, which outlines RB's ethical requirements that consist of the following ten principles.

We are also committed to following the UN Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development's (OECD's) Guidelines for Multinational Enterprises.



No Child Labour.  
Limitation of work by young workers



No forced labour or human trafficking



Provision of a safe and healthy working environment



Freedom of association and right to collective bargaining



No discrimination,  
equal opportunities  
and rights



No harmful or inhumane treatment



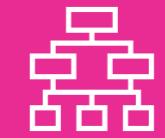
Fair working hours,  
remuneration and  
employment conditions



Protection of the environment



Conducting business with integrity



Implementation of management systems to effectively ensure compliance with these principles



## Protecting the Environment

**RB works to protect the environment today to help create a better world tomorrow. To that end, we are committed to reducing the environmental impact of our operations and products over the short, medium and long term.**

We strive to use pollution prevention and environmental best practices in all we do. Employees are expected to comply with all applicable environmental laws, regulations and RB's policies, and to report any incidents or conditions that may result in an environmental violation or have an adverse environmental impact.

Employees are also encouraged to identify opportunities for improving our environmental performance, including, for example, waste reduction, and energy and water efficiency.

**Take the time to learn more, do it for our planet!**

**RB Plastics and packaging pledge**





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# Sustainable Innovation

In RB we understand that It is essential that our products are designed and produced in a way that maximises the benefit to those who use them while minimising impacts on the environment.



## Designing Sustainable Products

We are committed to developing products that make a difference, contributing to enabling healthier lives and happier homes, and better use and maintenance of environmental resources. We design in better ingredients and ways to use our products to reduce the total environmental footprint – all without asking consumers to pay more or lose out on product performance; using fewer or more sustainable materials in their ingredients and packaging as well as requiring less energy and water during use and creating less waste.

## Sustainable Product Portfolio

We are committed to making our product portfolio more sustainable through innovative products. We will set targets on proportion of our net revenue generated from more sustainable products. A sustainability target associated with Net Revenue improves our ability to reduce our life cycle impacts with a direct connection to core business. Our Net Revenue from more sustainable products has steadily increased year on year.





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# Communication with Care

**Take as much care in sending electronic messages or leaving them on voicemail as you would when sending a letter or memorandum. Remember that your words could be taken out of context and always assume your words could be forwarded to unintended recipients, published or used in an investigation or litigation.**



## In RB we expect you to:

- Ensure your communications are ethical and responsible, clearly separating fact from opinion
- Safeguard confidential or sensitive information by only disclosing it to those who have a need to know and keeping it electronically and physically secure
- Designate information as confidential or sensitive and handling such information in compliance with applicable laws and RB policies
- If you suspect that personal or sensitive data has been improperly accessed or disclosed, report it immediately to Information Security Services/Legal

Please review and understand RB communicating with care guidelines that you can find in the following link:

[Communicating with Care Guidelines](#)



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## Protecting Confidential Information

You might have access to various types of confidential, personal or private information belonging to RB or its consumers, customers, suppliers or employees. You must only use confidential information for its intended purposes and as part of your duties. We do not disclose confidential information to anyone inside or outside of RB, except when the disclosure is required by law or for a specific and legitimate business purpose. We all have a duty to protect confidential information at all times, including outside of the workplace and working hours, and even after employment ends.

**But do you know what Confidential Information is? It is data not disclosed or made available to the public. The following is a list of examples (not comprehensive) for your review:**

- Product market share data or unpublished financial data
- Strategic and business plans including product launches or mergers and acquisitions
- Contracts, pricing, intellectual property, employee data or manufacturing processes

Data classification Policy



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## Employee Privacy

In RB we respect your personal and confidential information, meaning that access to such information is limited to only those who have the appropriate authorisation and a clear business need for that information. RB exercises appropriate and due care to safeguard personal information. Likewise, employees entrusted with personal information must always respect the privacy rights of individuals and ensure to keep such information confidential and secure.

Employee Data Protection Guide



Please follow these steps to protect this information:

### Before sharing

- Consider who and why you are disclosing it to. Check email addresses and contents before sending. Ask yourself if the recipient is entitled to access it?
- Is it secure? Consider encryption for sensitive or confidential data.
- Transferring data abroad? Different privacy laws may apply, do not hesitate to contact a member of the Legal team for guidance.

### Be careful

- Do not leave documents or laptops unattended. Clean your desk when you leave the workplace.
- If you need to dispose this information, ensure that you do so securely.



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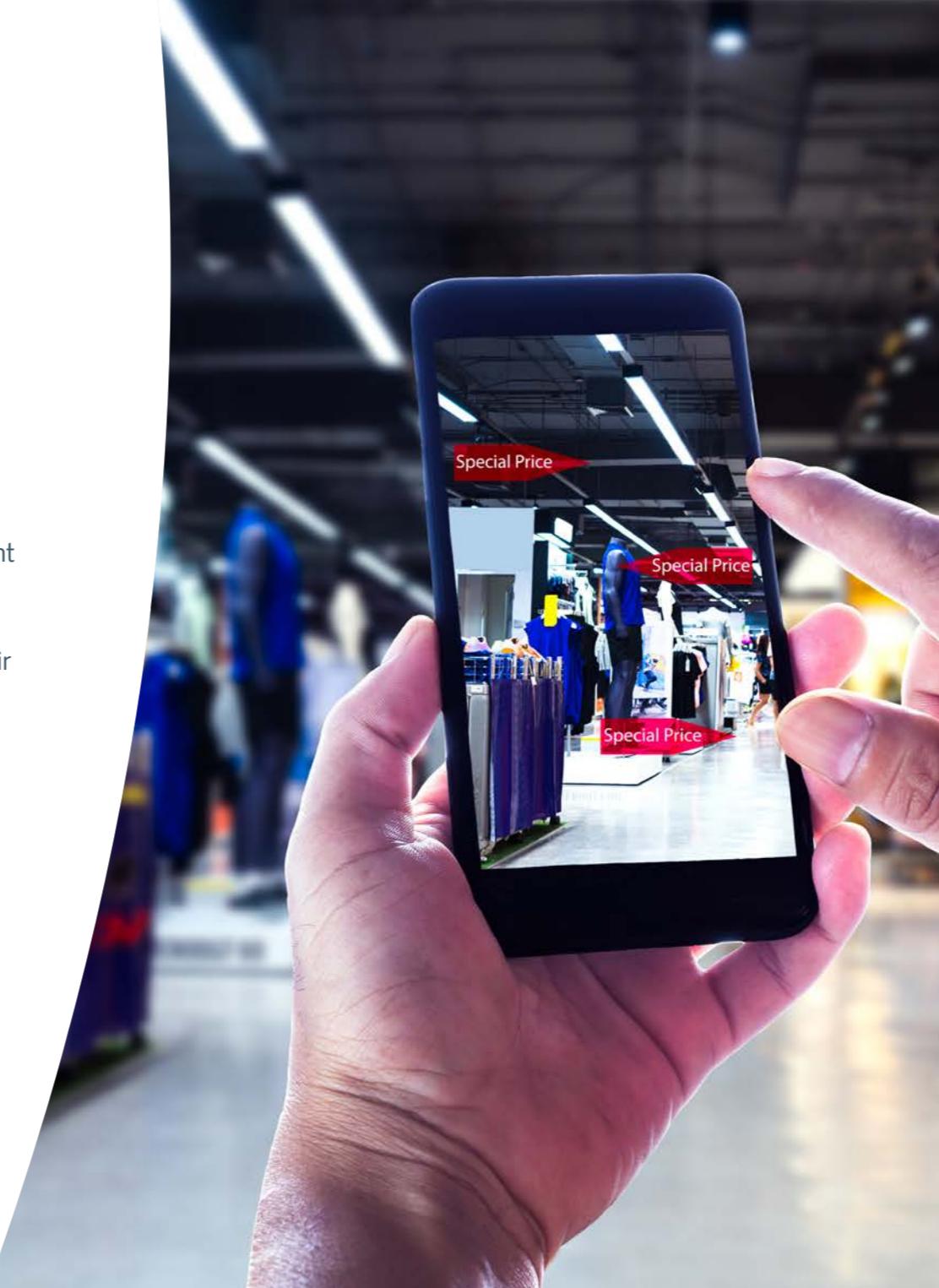
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## Consumer Privacy

**Consumers buy brands they trust, and RB's brands are loved and trusted across the world. In an increasingly digital led and data driven world, the use of personal data helps us to get to know our customers, learn about their preferences and offer them products and services which will engage, delight and retain them.**

However, it is critical that we do so in a manner that will maintain their trust. Core to this is our commitment to respect and protect our consumers' privacy. When our consumers use our websites or sign up to our marketing campaigns, they are entrusting us with their personal information. We need to maintain that trust by being mindful of our consumer's privacy rights and ensuring we use personal data in the right way.



## In RB we expect you to:

**Take responsibility for what we do with our consumers' personal data and have mechanisms in place to demonstrate compliance, including:**

- Ensuring that our processing of consumer personal data is always lawful, fair and transparent.
- Always having valid legal ground for collecting and using personal data, taking all reasonable steps to securely protect it.
- Being clear, open and honest with our consumers about our objective for processing their personal data.
- Personal data we are processing is limited to what is necessary, not holding more data than we actually need or for longer than we should.

Further information about managing consumer privacy can be found in the following link:

[Global Privacy Office Website](#)



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## Protecting company assets

**RB facilities, equipment, materials, property, product technology and information have been acquired through the hard work of employees and at RB's investment and expense. We all must ensure that RB property is only used for proper business or management-approved purposes, meaning that we are all responsible to protect all RB assets against damage or misuse. Employees who engage in theft, fraud, embezzlement or misappropriation of RB's assets will be subject to termination of employment and will be referred to the police authorities.**

### RB expect you to:

- Never waste or damage RB assets or misuse them for your own personal interest, or to reduce your own personal expenses.
- Ensure that any personal use of RB resources does not adversely affect your work performance or cause disruption in the workplace.





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# Acting with Integrity

## Bribery and Corruption

In RB we have zero-tolerance of bribery and corruption. We are fully committed to complying with anti-corruption laws in all countries in which RB operates. RB prohibits all kind of improper payments, including facilitation payments. It is crucial that you act with honesty and integrity at all times, wherever you conduct business on behalf of RB. You must never offer, pay or receive bribes or kickbacks. RB would rather lose business than obtain it through corrupt or improper means.

Facilitation Payments are unofficial payments made to a government official to secure or expedite the performance of a routine administrative action that the official is obliged to provide in any event.

Bribes can be presented in different ways, it could be cash payments, bank transfer, holidays disguised as business trips, gifts, event tickets, job opportunities, donations, discounts or preferential terms.

Corporate Policies



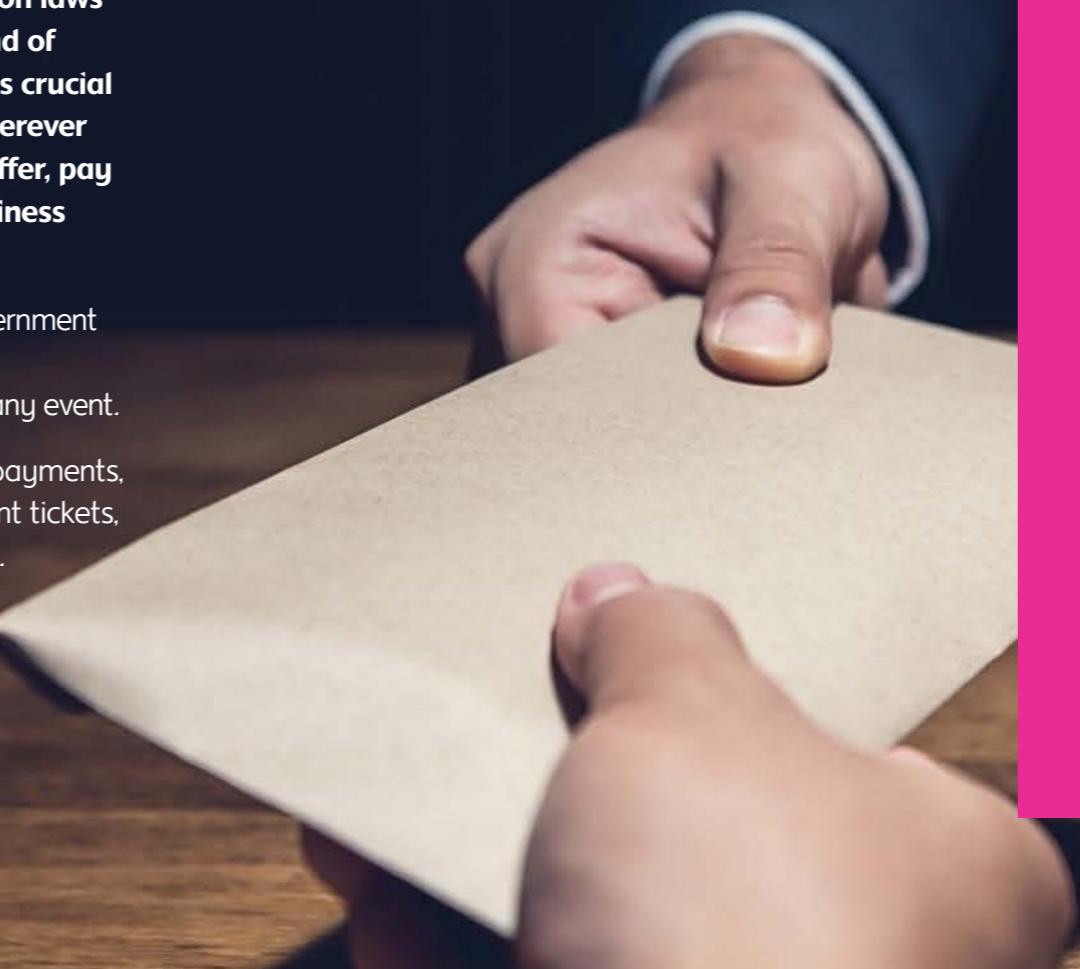
## Political Activities

RB is not a political organisation. It does not support political parties (including candidates or representatives of political parties) nor contributes to the funds of groups whose activities are calculated to promote party interests or the election of a specific candidate.

We respect the right of our employees and contractors to freedom of association. Accordingly, employees and contractors are welcome to participate in political activities, so long as this is done in their personal capacity using their own time and resources.

Employees and contractors who are concerned about whether their political activities are appropriate should contact a member of the Legal or the Compliance teams.

Please take the time to review and understand our Responsible Advocacy Policy that you can find in RB's Corporate Policies site in Rubi





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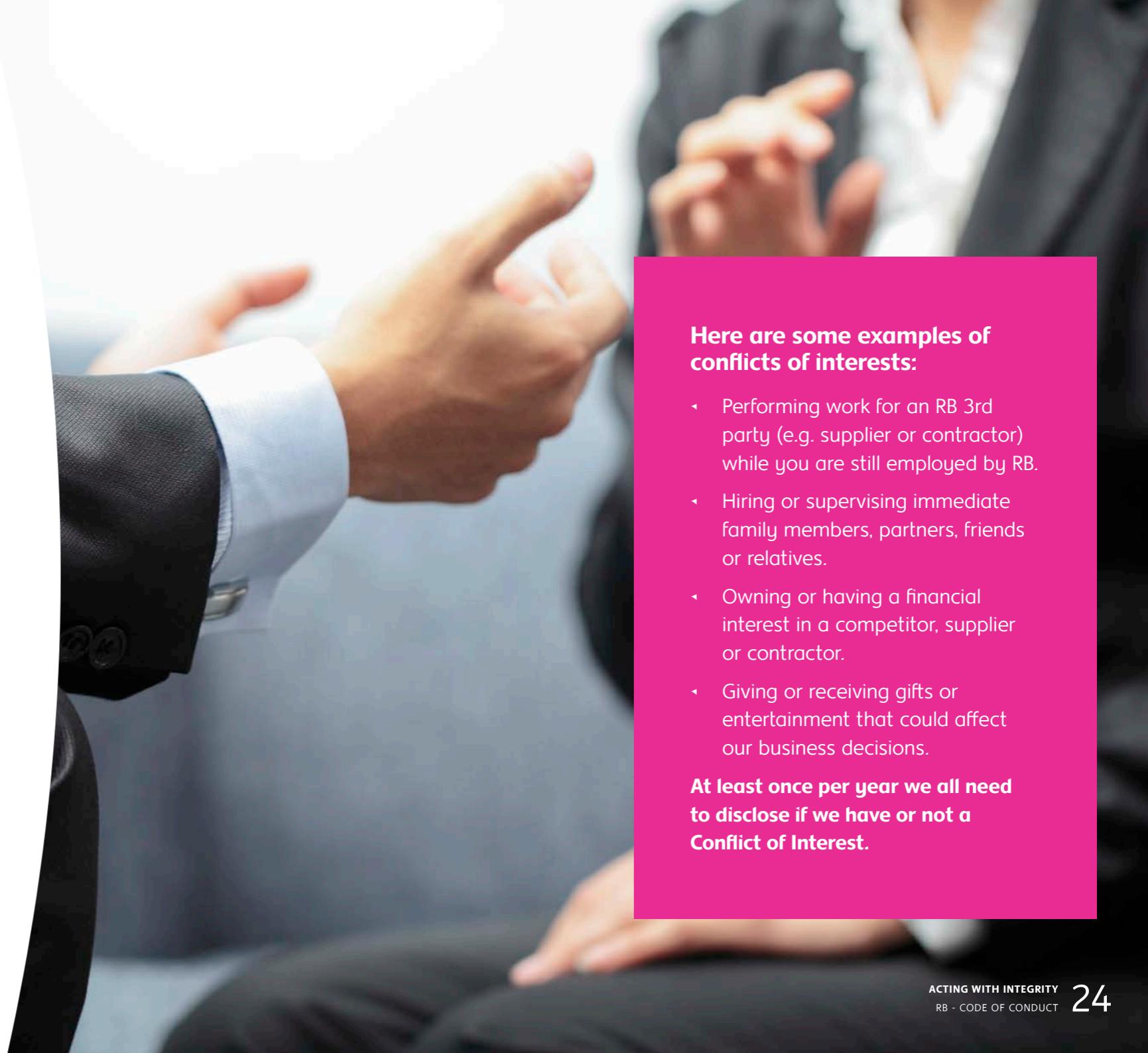
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## Disclosure of Conflict of Interests

**A conflict of interest arises when our personal relationships or financial interests interfere with our ability to objectively perform our job. In case you are facing a situation that could become a conflict of interest, you should act in the best interests of RB. This includes avoiding business dealings between RB and a family member, a friend or a business in which you or a family member or friend has a substantial interest or benefit.**

You should also avoid personal relationships at work that improperly influence sound and objective decision making. Full disclosure and approval is required for any activity, transaction, or relationship that could create the appearance of a conflict of interest by employees before they or their family members or partners undertake the activity. If the activity is already taking place, disclosure is still required.

**Conflict of Interest site** 



**Here are some examples of conflicts of interests:**

- Performing work for an RB 3rd party (e.g. supplier or contractor) while you are still employed by RB.
- Hiring or supervising immediate family members, partners, friends or relatives.
- Owning or having a financial interest in a competitor, supplier or contractor.
- Giving or receiving gifts or entertainment that could affect our business decisions.

**At least once per year we all need to disclose if we have or not a Conflict of Interest.**



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## Exchanging Business Gifts and Entertainment

The act of exchanging business gifts and corporate hospitality can play a healthy role in building business relationships. However, gifts and hospitality are problematic if they create actual or perceived conflicts of interest, or otherwise appear to influence a business decision. Giving or accepting gifts, hospitality, travel, discounts, favours, or services is prohibited where it could, or could appear to improperly influence a person's business decision.

**Gifts and Hospitality Site**



### RB expect you to:

Never accept or offer a gift, hospitality or travel that could present an actual or potential conflict of interests or could be perceived as intended of achieving improper influence in relation to a business decision.

- When we offered or accept a gift, hospitality or travel, we need to make sure it is aligned with local regulation as they could be more stringent and forbid the offer or acceptance of gifts or hospitality.
- If the gift offered by the third party is over GBP 25.00 (or its equivalent in your local currency) you should disclose it in the Gifts Register tool which you can access in the following link.
- Local exceptions could apply for receiving or giving any kind of gift or hospitality. Please make sure to know and understand your applicable local regulation.



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## Fair Competition

The way we compete is as important as the result we achieve. In RB we are committed to conducting our business activities in full compliance with the competition laws of the countries in which we do business. We do not share non-public information regarding pricing, costs, product supply, customers, marketing or other sensitive information with competitors, nor do we use our market position to illegally influence the legitimate activity of a competitor.

Follow the criteria and approval process listed in RB's Competitor Contact Policy if you need to interact with a competitor to discuss a project or to attend any meetings including Trade Association meetings or any other events where competitors might be present.



### RB expect you to:

- Refrain from discussing prices, terms and conditions, marketing plans, and similar matters of competitive interest when involved in trade association activities or in other situations involving communications among competitors, customers or suppliers.
- Be aware of the competition laws in the jurisdictions in which RB conducts business.
- Immediately disengage from an improper discussion with a competitor and contact a member of the Legal team.

**Please contact a member of the Legal team in case you have any doubts.**



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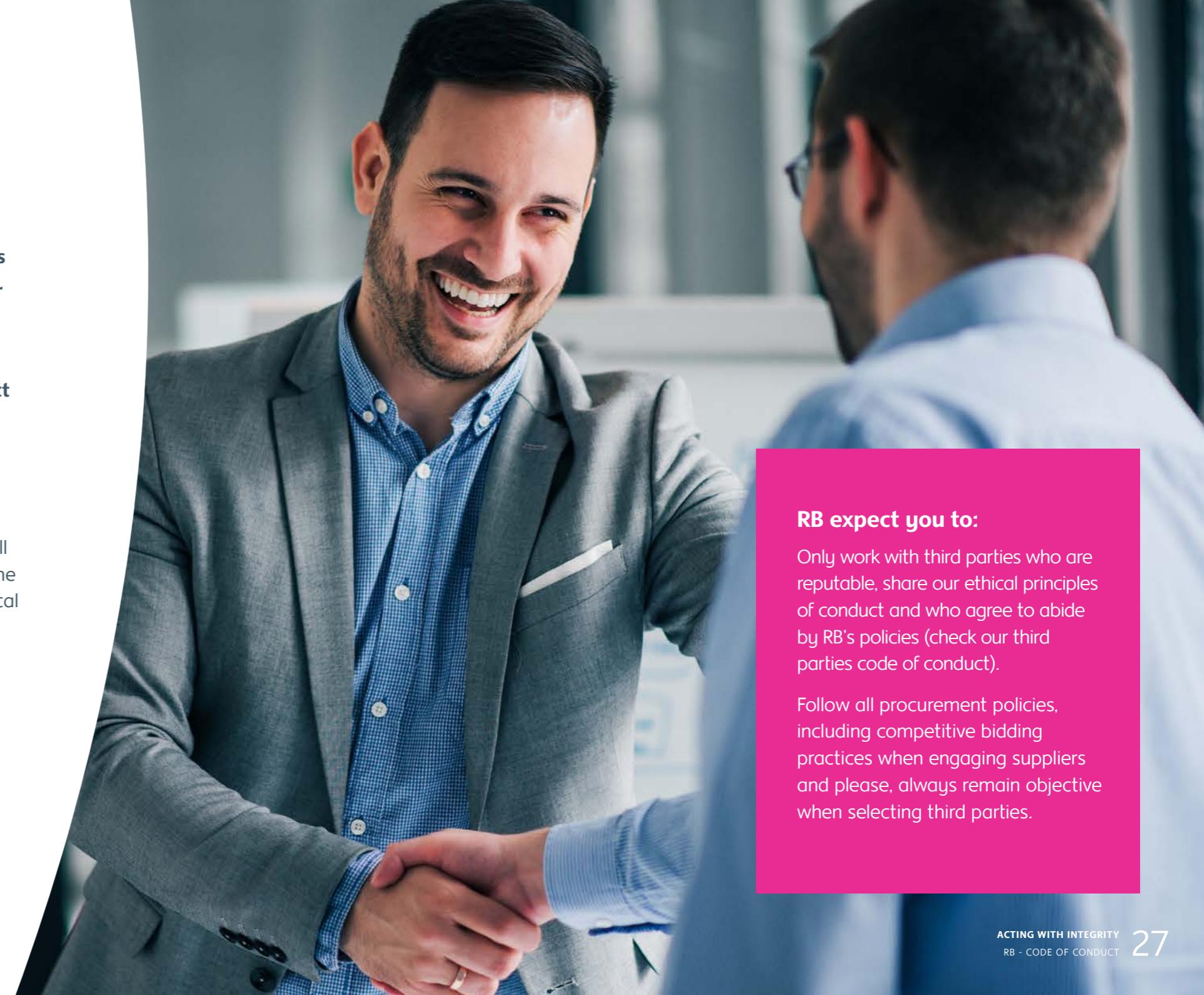
Closing message

## Strong relationships with third parties

We rely in our supplier and distributor relationships to achieve successful business all around the world. We expect these third parties to obey the laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality. Most importantly, we expect our suppliers to promote responsible business behaviour and high standards of business conduct.

It is important you are aware that RB can be held liable for bribes paid by a third-party acting on our behalf. Please take particular care when evaluating all prospective third-party engagements to determine the corruption risk that this may involve. Consult your local Compliance team for further guidance or advice with regards to the Due Diligence program that RB has in place to assess reliability of third parties.

Due Diligence site



### RB expect you to:

Only work with third parties who are reputable, share our ethical principles of conduct and who agree to abide by RB's policies (check our third parties code of conduct).

Follow all procurement policies, including competitive bidding practices when engaging suppliers and please, always remain objective when selecting third parties.



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## Trade Sanctions

RB complies with all applicable Economic and Trade Sanctions Laws in our operations, including export controls, trade restrictions and embargoes, legal economic sanctions and boycotts that restrict activities with certain countries, entities, or individuals worldwide.

RB is committed to ensuring that these business transactions are accomplished in full compliance with applicable sanctions or trade controls and laws. RB expects all employees, contractors, and other third parties acting on the company's behalf to comply with these laws, support RB in making the right decisions in line with the corporate position and report if they become aware of, or suspects, the existence of a sanctions compliance concern which might be linked to the business.

Corporate Policies

## Anti-money laundering

RB complies with all applicable laws and regulations aimed at combating money laundering and terrorist financing. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

RB expects all employees, contractors, and other third parties acting on the company's behalf to comply with these laws, support RB in making the right decisions in line with the corporate position and report their concerns if they become aware of, or suspects, the existence of a money-laundering matter which might be linked to the business.



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## Responsibility to our shareholders and the public

Investors and the public rely on us to present accurate and timely information and maximise the return on shareholder investments, delivering RB's commitments. Therefore, we are all responsible for documenting and recording RB information honestly and properly.

Books and records must be maintained in all respects according to law, accounting principles, policies and procedures that RB has adopted. In RB we are all expected to:

- Accurately and honestly provide information in business reports and records.
- Make sure that all entries are timely and accurate such as on expense or project reports.
- Never create or alter records so that they contain false data so that they fail to accurately reflect the true nature of the transactions.
- Never record transactions that have not or not yet occurred.
- Never destroy documents or delete data that could be required to support an investigation or foreseeable litigation.

**If you have any doubts or questions please do not hesitate to contact a member of the Legal team.**





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# Government investigations and other legal matters

**Almost all business records –including email and electronic records– may become subject to disclosure due to litigation or government investigation. When you know, reasonably believe or have been notified that a regulatory investigation or any litigation is expected or ongoing, you must retain and preserve all related documents regardless of format.**

Do you know what a business record means? It is any recorded information however it has been created, received, modified, maintained, archived, retrieved or transmitted that supports our business activities (e.g. paper, microfilm, e-mail messages, photographs, electronic and digital records).



## RB expects you to:

- Maintain all business records in compliance with applicable laws and RB's record-keeping policies and procedures.
- Do not obstruct an ongoing investigation or do anything which could be perceived as attempting to improperly influence the course of an ongoing investigation.
- Never alter, conceal or destroy any documents or records that are subject to an expected or ongoing investigation or litigation matter.



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# Insider trading and securities law compliance

In our work, we may have access to information about RB, its operations, one of its customers, suppliers or business partners. At times, that type of information may be considered to be material, non-public or “inside information” and would be information an investor would consider relevant in deciding whether to buy or sell shares.

This is why in RB we are all prohibited from disclosing such information to other people, including family members and friends. Employees and contractor should adhere to the principles, policies and applicable regulations that RB has adopted in respect of insider trading and securities law compliance.



## We build trust from our investors by:

- Never buying or selling any securities based on material, non-public information.
- We do not give someone else (e.g. friend, spouse or “broker”) a tip regarding material, non-public inside information.
- In case we have doubts regarding inside trading, we consult a representative from the Legal team before acting.

Trading RB stock or the stock or any other company based on material, non-public inside information, not only breaks the trust with our investors and the public, it is also illegal.



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# Final Message

**Be proud of always acting with Integrity!**

**Wherever we are located, we operate as a team. We face our challenges, overcome obstacles, and celebrate successes together. Collaborating and supporting each other for the good of our consumers, employees, communities and shareholders is how we succeed.**

This document was developed by the Ethics & Compliance Team. In case of questions or comments, please send us a message to: [Ethicsandcompliance@rb.com](mailto:Ethicsandcompliance@rb.com)



