

# **Restricted Substances List Policy**

## Background

RB is committed to delivering innovative solutions for healthier lives and happier homes in a manner that continuously improves their environmental and safety profile. Underpinned by our commitment to providing compliant and safe consumer products and our overarching product stewardship and social responsibilities, our aim is to make ingredient decisions that will be right for our consumers.

We maintain a **R**estricted **S**ubstances **L**ist (RSL) to ensure a consistent, global approach to safeguarding our consumers & employees from exposure to potential ingredients of concern. The RSL (which has been in place since 2001) is a list of ingredients that RB has banned or restricted from our global product portfolio.

Since the RSL's inception, RB has carried out a range of ingredient removal and restriction programmes in order to implement the Company's positions with regard to the use of affected ingredients. We take a four-pillar approach to assess the horizon regulations, sustainability, safety and public landscape of ingredients we use to identify potential risks and opportunities for substituting products with safer, healthier or more environmentally preferred alternatives.

Our progress and highlights are annually reported in our Sustainability Report, available on rb.com.

## Policy

## RB's policy is to:

- 1. Formally monitor and review substances/ingredients used within our products.
- Assess regulatory, sustainability, safety and reputation considerations in order to determine RSL internal policy statements and directions on the use (or restriction/prohibition of use) of individual substances or groups of substances which may be contained within finished goods (formulations, packaging, devices etc.).
- 3. In many instances, go above and beyond basic regulatory requirements by globally implementing the RSL policy to continually improve the environmental and safety profile of our products by actively removing and/or reducing specific substances/ingredients of concern.
- 4. Continuously review the RSL regarding new and emerging science relating to ingredients or our products with the aim of keeping the RSL up to date and relevant at all times.
- 5. Ensure employees have a level of knowledge and understanding of RB's sustainability and product stewardship commitments appropriate to their responsibilities.
- 6. Conduct an annual review, including progress against sustainability targets and ensure that a summary of that review is publically available in our annual Sustainability Report.

## Scope

This policy applies to all RB products, including where RB is the registration holder or equivalent, that RB places on the market under a RB brand, regardless of manufacturing site or region/country of sale.



## **General Requirements**

The restrictions validated through the RSL must be applied to all products marketed by RB. Requirements for new products should be addressed during the development and/or acquisition integration procedures and changes to portfolio products managed via existing product development or change management procedures.

RB has a specific sourcing policy covering natural raw materials to ensure that these materials are responsibly sourced. For more information please see our Policy on the Responsible Sourcing of Natural Raw Materials.

RB closely monitors and carefully considers new information published by scientific research and regulatory organisations around the world on ingredients. If required, RB will modify the content of the RSL accordingly to reflect this information. In such instances an impact assessment on the current portfolio will be completed and a programme of restriction/removal will be agreed with the business.

Non-compliances from the RSL are allowed in exceptional circumstances at the discretion of the RSL Policy owner. A non-compliance concession must include a full business justification, safety, regulatory, sustainability and reputation reviews and a time bound plan to bring the product into compliance. An example where this would be appropriate would be to permit the reformulation of a newly acquired product in line with RB's RSL.

RB recognizes that certain raw materials may sometimes contain unavoidable trace levels of impurities that would otherwise never be intentionally added. RB chooses its ingredients very carefully and aims to avoid undesirable impurities in its products. However, there are instances where impurities are unavoidable; in such cases we conduct product safety reviews to protect consumers, patients and our workers. For more information please see our Consumer Safety Policy. In addition, RB continues to work with our suppliers to drive new technologies and ensure residual levels of impurities are reduced to the lowest level that is technically achievable.

If new scientific evidence raises legitimate questions about the safety or safe use of a specific ingredient, we will innovate to find alternatives and if necessary, we will reduce or remove the ingredient in question from our products.

## **Implementation**

Compliance to the RSL is mandatory and is the responsibility of all RB employees. The RSL Policy is owned and upheld by the EVP Category Development Organization. The Global Safety, Quality & Compliance team is responsible for developing and maintaing the RSL Policy, advising on upcoming and future risks and driving full compliance through clear transparency and leadership as well as ensuring full reporting compliance to it.

Queries regarding the implementation of this policy should be directed to sustainability@rb.com

Effective May 2017. Policy Owner: EVP Category Development Organisation