

# Global Responsible Advocacy Policy

**Effective date:** 1 January 2019

**Country scope:** Global

# GLOBAL RESPONSIBLE ADVOCACY POLICY

## 1. Introduction

- 1.1 This Policy has been developed by RB to help employees and relevant contractors understand and comply with our approach to conducting any advocacy activity in a transparent, ethical and responsible way.
- 1.2 This Policy establishes the rules which ensure that we do so in a way which maintains and builds our reputation as a trustworthy corporate citizen by remaining consistent with RB's values, its Code of Conduct and all other policies.
- 1.3 Many countries where RB's products are sold are heavily regulated and have complex legislative landscape. The Breast-Milk Substitutes (BMS) regulation is one such example. We therefore believe it is in the interests of our consumers, customers, shareholders and employees, that we constructively advocate and transparently engage in the dialogue around public policy.
- 1.4 Our advocacy activities typically include dialogue around: product quality and safety; selfcare and the role of OTC (Over-The-Counter) medicines; health; hygiene; infant nutrition; sustainability and changes to legislation. From time to time we may also be involved in dialogue around topical patient access issues.
- 1.5 Besides the Code of Conduct, other relevant policies that should be read in association with this Policy are:
  - 1.5.1 Anti-bribery policy (including gifts and hospitality);
  - 1.5.2 Breast-Milk Substitutes policy; and
  - 1.5.3 Competition Law policies.

## 2. Our RB values

- 2.1 At RB, our purpose is to make a difference by giving people innovative solutions for healthier lives and happier homes. We also strive to be the world's leading nutrition company for infants and children and to nourish the world's children for the best start in life.
- 2.2 Our core values of Responsibility, Ownership, Achievement, Entrepreneurship and Partnership underpin our shared vision. RB's core values are a set of interwoven principles and behaviours. They are all vital, and the Responsibility value is at the centre.
- 2.3 RB's Code of Conduct ensures that employees and contractors across the Group have a clear understanding of the principles and ethical values that RB promotes.
- 2.4 As a company, we are committed to carrying out business in accordance with the highest ethical standards. This includes complying with all applicable laws in the countries in which we operate.

## 3. Governance regarding Responsible Advocacy

- 3.1 The RB Group Board of Directors ("Board") has the oversight of this Policy and in discharging its responsibility is assisted by the Corporate, Responsibility, Sustainability, Ethics and Compliance Committee (CRSECC).
- 3.2 This Policy is owned by RB's Corporate Affairs and Sustainability function, but responsibility regarding its implementation is shared with the SQRC (Safety Quality Regulatory and Compliance) function, given the public facing nature of the work undertaken by the Regulatory team, and other relevant functions that are involved in advocacy activities.
- 3.3 RB's Group Ethics and Compliance function is primarily responsible for advising on Policy implementation, performing monitoring activities to ensure compliance with the Policy's provisions, and assisting the Policy owner with implementing any changes required to enhance RB's compliance.

#### **4. What do we mean by advocacy?**

- 4.1 Advocacy means the interaction (including all forms of communication whether formal, informal or social whilst representing RB on business) we have with NGOs, public authorities or associations in general, at global (e.g. UN, WHO), regional (e.g. EU), national or local level, regarding legislation, public policy or administrative decisions. It includes contact with elected representatives (e.g. members of parliament, congress) and appointed public office-holders (e.g. government ministers, European Commissioners and regulators), as well as officials and agents of public bodies (e.g. local, national and international public servants and their advisers).
- 4.2 In all RB interactions with public authorities as customers or to communicate the benefits of our products, this Policy applies in addition to RB's specific policies regulating interactions with healthcare professionals ("HCPs") and healthcare entities ("HCEs").

#### **5. Who is subject to this Policy?**

- 5.1 This Policy applies to all employees of RB companies globally, members of RB's Board and RB's contractors when acting on RB's behalf such as agents, public affairs, communications and legal consultants, outsourced personnel and other third-party representatives.
- 5.2 Employees involved in or employed in any of the following functions i.e. Public Relations, Corporate Communications or Corporate/Public/External Affairs and conducting advocacy activities in key RB priority markets, as defined by the Corporate Affairs function, are required to:
  - 5.2.1 submit their annual advocacy activity plans to SVP Corporate Affairs for approval; and
  - 5.2.2 to keep SVP Corporate Affairs informed of any material developments regarding advocacy activities not originally included as part of their annual advocacy activity plans.
- 5.3 Any third parties or consultants engaged by RB to conduct advocacy activities are required to:
  - 5.3.1 have a written agreement in place and be contracted and/or conducted in compliance with relevant RB financial controls and policies;
  - 5.3.2 adhere to other relevant RB policies determined by the scope of services rendered; and
  - 5.3.3 adhere to applicable national and international laws and regulations, including but not limited to RB's policies in respect of Anti-bribery, Breast-Milk Substitutes and Competition Law.

#### **6. Representing RB in a transparent and honest way**

- 6.1 All employees and contractors must accept responsibility for maintaining and enhancing the Company's reputation for integrity and fairness in its business dealings. In its everyday business transactions, the Company must be seen to be dealing even-handedly and honestly with all its stakeholders be they consumers, customers, suppliers, employees, contractors, NGOs, governments & regulators, civil society and others with whom the Company has a relationship.
- 6.2 When engaged in advocacy, this means that employees and contractors must be transparent and clear about their activity, whether it is formal or informal. They should always identify themselves by name, declare the company or companies they work for or represent and make clear the purpose of the advocacy as well as the company position.
- 6.3 They must also ensure that they take all reasonable steps to provide true, accurate and complete information. They must not knowingly mislead and must take care to avoid doing so unintentionally. If they subsequently discover they have misled someone by mistake, they must take swift action to correct any false impression they may have made.
- 6.4 RB will publish on RB.com its position in relation to relevant public policy issues. We will also follow all public disclosure requirements relative to our US Federal and EU lobbying expenditure and participate in statutory lobbying transparency schemes and codes where these are agreed locally. Examples of regulations followed by RB globally are set out in the Appendix to this Policy.

## **7. Political Activity**

- 7.1 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.
- 7.2 Political contributions do not only include funds, gifts, loans or items of value, but also include in-kind contributions such as goods (excluding company products) or services being given or made available.
- 7.3 Advocacy does not include personal political activity. 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 consult with their manager or a member of the Group Ethics and Compliance team.

## **8. Our Trade Association Memberships**

- 8.1 We are a member of several health, hygiene, home and nutrition (including the Infant and Child Nutrition business) focused trade associations across the globe. RB's membership is annually reviewed (by our Group Ethics & Compliance department) and published in our Sustainability report and on our website (including total related global expenditure).
- 8.2 We seek to ensure that the trade associations and industry policy groups, to which RB is affiliated with, operate to the same responsible advocacy standards as RB.
- 8.3 If RB does not agree with the position of one of our trade associations, we should communicate our position clearly to the organisation. RB reserves the right to engage in advocacy separately from the trade association in these circumstances.
- 8.4 RB employees engaged in advocacy as the representative of one of our trade associations must be transparent and clear about the organisation in the same way as they would when acting on behalf of RB. This includes identifying RB's link to the organisation, their name and role within both the organisation and RB plus the organisation's position.

## **9. Bribery and Corruption**

- 9.1 RB is committed to complying with all laws and regulations which govern our operations in every country in which we operate. RB's Anti-Bribery Policy (available on RB.com) emphasises our zero-tolerance approach to bribery and explains our individual responsibility to comply with anti-bribery and anti-corruption laws around the world and to ensure that any third parties that we engage to act on our behalf, do the same.

## **10. "Revolving Door" commitment**

- 10.1 The term "revolving door" refers to the movement of high-level employees from public office to private companies and vice versa.
- 10.2 Recognising the inherent risks relating to potential conflicts of interest which arise from the "revolving door", all RB employees and contractors annually complete and certify compliance with a specific module focussed on conflicts of interest as part of Compliance Passport training.
- 10.3 In the event of RB employing an individual from public office, RB shall ensure that a six month cooling-off period is observed prior to the individual commencing employment with RB.

## **11. Record keeping and monitoring**

- 11.1 Employees and contractors are all responsible for documenting and recording RB information honestly and properly. Everyone engaged in advocacy must keep records and report regularly on the contents and outcome of their advocacy activities.
- 11.2 As set out in section 3, Ethics and Compliance is responsible for monitoring the effectiveness and application of this Policy.

- 11.3 As part of the annual Compliance Passport certification procedure relating to RB's Code of Conduct, employees and contractors must annually certify their compliance with the provisions of RB's Code of Conduct, which includes compliance with the requirements of this Policy.

## **12. Employee Responsibility**

- 12.1 RB employees (including those mentioned in section 5) have the obligation to read and follow this Policy, to understand and identify any issues or concerns that may arise in their business activities and escalate potential compliance concerns related to responsible advocacy to their local Compliance Officer or a member of the RB Group Ethics and Compliance team.
- 12.2 Our RB Responsible Advocacy Policy cannot address every specific situation that may occur. Therefore, in complex situations, RB employees should apply their common sense and good judgment to make the right decision. Where the situation seems complex, they should ask themselves the following questions:
- 12.2.1 Is my action legal?
- 12.2.2 Is my action the right thing to do?
- 12.2.3 Would I be okay with my action if I knew it would be reported in the media?
- 12.2.4 Would I be comfortable explaining my action to my family and friends?
- 12.3 Always, when in doubt, RB employees should ask their manager, supervisor or contact a member of the Ethics and Compliance team for clarification and/or guidance.

## **13. Non-compliance**

- 13.1 Any RB employee or contractor, who violates this Policy or who permits anyone else to violate this Policy may be subject to appropriate disciplinary action, up to and including dismissal.

## **14. Updates, Review and Ownership**

- 14.1 This Policy may be updated from time to time, and the updated version of the Policy will be immediately made available on the RB website.

## **Appendix**

These are non-exhaustive examples of legislative and voluntary regulatory requirements for political advocacy around the world which RB complies with in addition to the requirements of this Policy:

UK:

- Companies Act 2006 (disclosures)
- Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014 (register of consultant lobbyists)

USA:

- Lobbying Disclosure Act, as amended (2 U.S.C. § 1601)
- Federal Election Campaign Act, (FECA)
- Bipartisan Campaign Reform Act (BCRA)

EU:

- European Union (Commission and European Parliament): Inter-Institutional Agreement on the Transparency Register (2014) including the annexed Code of Conduct.