

CORPORATE POLICY

BUSINESS INTEGRITY POLICY

Valid from:	<20.07.2025
Security Level	<Internal>
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Policy Owner:	< Chief Ethics and Compliance Officer & SVP Legal >

Purpose and Scope

Purpose

Reckitt is wholly committed to doing business ethically and always in compliance with applicable anti-bribery and anti-corruption ("ABAC") laws and regulations. This Policy sets Reckitt's minimum expectations and standards for our business practices and guides our behaviour to ensure consistent and continued compliance with ABAC and similar legislation.

Scope

This Policy is applicable to all Reckitt employees, contractors, and sub-contractors globally – anyone who works for Reckitt Group (i.e. a company from the Group, or a company which subsequently joined the Group, or a legal entity under the Group), and to all [third parties](#) engaged by any Reckitt entity.

To the extent there is a local law or an internal document that contradicts the provisions of this policy, such local law or policy shall govern. Reckitt will comply with all applicable laws in the various geographies across the globe, and this policy is not meant to circumvent any employee rights as provided by applicable law.

Policy Statement

A. Anti-Bribery

The direct or indirect offer, payment, solicitation or acceptance of a [bribe](#) in any form is strictly forbidden. Making a [facilitation payment](#) is also prohibited. An action or activity which could reasonably be viewed as offering, paying, soliciting or accepting a bribe (even if it is not) could also be extremely damaging to Reckitt's reputation and must always be avoided.

Reckitt will forego existing or new business, or suffer delay, cost or inconvenience, rather than retain or obtain business, or avoid delay, cost or inconvenience, through the

provision or receipt of an improper benefit.

B. Conflicts of Interest

A [conflict of interest](#) typically arises where family, friendships, financial or social factors could improperly influence one's decision making. There are many examples of potential and actual conflicts of interest, such as: influencing Reckitt to hire an employee because they are a personal friend; causing Reckitt to enter an agreement with a family member's company; and engaging in a personal business that is competitive to Reckitt.

You must immediately disclose any actual or potential conflict of interest, and provide all potentially relevant information, to your line manager and to the Ethics & Compliance function using the Convercent system. Upon receipt of a report of an actual or potential conflict, the member responsible from the Ethics & Compliance function will determine the action that must be taken and communicate it to you. All records regarding the actual or potential conflict of interest, including the determination made by the Ethics & Compliance function, must be retained in the Convercent system.

C. Gifts and Entertainment

While sometimes playing an important role in business relationships, [gifts and entertainment](#) given to or received from a third party can constitute a bribe or create a conflict of interest, whether actual, potential or perceived.

A gift or entertainment should not be given or received unless it is infrequent, its quantity or value is not excessive, and it is consistent with industry practice, relevant cultural norms and applicable law. Offering or receiving a gift or entertainment that is intended to affect, or has the reasonable possibility of affecting, a business decision or course of action is strictly forbidden.

Gifts of cash or cash equivalents, such as gifts cards, should never be given or received. Gifts or entertainment should never be offered or given to [government officials](#), unless approved in advance by the Chief Ethics and Compliance Officer.

Approval to offer or receive a gift or entertainment must be obtained in advance of the offer or receipt in accordance with the approval processes set out [in Appendix A](#). You must keep all records of gifts and entertainment offered and received and of all approvals obtained in accordance with the processes [in Appendix A](#). For further specific requirements relating to gifts and entertainment provided to HCPs and HCEs, please refer to the [Meals, Gifts, and Hospitality to HCPs and HCEs SOP](#).

D. Healthcare Interactions

For some parts of Reckitt, it is desirable and even necessary to interact and collaborate with [Healthcare Professionals \("HCPs"\)](#), including [Pharmacists](#), [Healthcare Entities \("HCE's"\)](#) and Government Officials, in order to provide information and education about our products, share clinical experiences, and develop Reckitt's business.

You must never offer or provide any remuneration or anything of value to induce, influence, encourage or reward any individual to purchase, use, or prescribe Reckitt

products, or to reward such activity that has occurred.

In addition to the requirements of this Policy, our healthcare interactions must comply with the relevant requirements of [Reckitt's HCP documents](#), the [Breast Milk Substitute Marketing Policy](#), and all local laws.

E. Donations, Charitable Contributions, Sponsorships and Grants

Reckitt is committed to making significant contributions to support organisations and activities that have a positive social impact. However, such activities can create the risk or perception of bribery or conflict of interest. The giving or providing of anything of value to any Third Party, through charitable contributions, donations, sponsorships, grants or otherwise, must comply with the requirements of this Policy as well as with the [Donations, Charitable Contributions and Social Impact Partnerships SOP](#) and the Guidelines on [Events and Sponsorships](#), as applicable.

Discipline for Non-Compliance

Anyone who violates this Policy may be subject to appropriate disciplinary action, up to and including dismissal, in addition to any potential other fines, penalties or other sanctions that may be imposed by other parties, such as regulatory authorities.

Contact Information

If you have questions about this Policy or the related procedures, please contact a member the Ethics & Compliance function.

Glossary of Terms

For the purposes of this Policy:

Term	Definition
Bribe	A "bribe" is the offering, promising, giving, requesting or receiving of a financial or non-financial advantage or anything of value if the purpose of the payment is to secure the improper performance or misuse of a person's position.
Conflict of Interest	A "conflict of interest" is a situation in which someone cannot make a fair decision because they will be personally affected by the result.
Facilitation Payment	A "facilitation payment" is a (usually small, unofficial) payment to a government official to ensure or speed up performance of routine or necessary action which is part of the government official's usual responsibilities.
Gifts and Entertainment	"Gifts and entertainment" mean anything of value that is offered by any Reckitt personnel to a third party, that party's relatives, friends and close associates, or which is offered by a third party to any Reckitt personnel, their relatives, friends or close associates. Gifts and entertainment can take many forms, including tangible items, discounts, services, or experiences (e.g. meals or events).
Government Official	A "government official" or "GO" is any officer, employee or representative of a government or a government-owned or government-controlled

	entity or a public international organisation, including a legislative, administrative or judicial official (regardless of whether elected or appointed), an individual who holds a position in a political party and a candidate for political office. For certainty, HCPs working in or through public HCEs are government officials.
Healthcare Entity	A "healthcare entity" or "HCE" is an entity that provides healthcare services by or under the direction of healthcare professionals or conducts healthcare research or training. HCEs include hospitals, pharmacies, academic institutions, specialty societies, patient care organisations, sovereign or government health funds, insurance companies, any care organisations, and any other entities which purchase, reimburse or dispense pharmaceutical products.
Healthcare Professional	A "healthcare professional" or "HCP" is a professional who provides healthcare services or who is otherwise in a position to influence, recommend, administer or dispense the purchase or use of Reckitt healthcare products, including but not limited to: physicians, nurses, dieticians, physician assistants, midwives, medical residents, licensed pharmacists, pharmacy technicians, and members of formulary committees, regardless of the place or setting in which they perform services.
Pharmacists	"Pharmacists" include licensed and unlicensed pharmacists, pharmacy technicians and clerks located at pharmacies, drugstores, supermarket pharmacies or any other trade location.
Third Party	A "Third Party" is any individual or legal entity that is not directly employed or owned by Reckitt. The term Third Party includes, but is not limited to, the following: Vendors, Agents, Suppliers, Distributors, Customers, Joint Venture Partners and Research partners, including Third Parties hired by one of the above on behalf of Reckitt (often referred to as sub-contractors). Included in this category are also entities which receive Reckitt's Donations (including contributions for sponsorship, patronage or social and other investment purposes).

Appendices

Appendix A: Gifts and Entertainment Approval Processes

Gifts

Value*	Approval Process
Up to £50	Self-approve
Between £50 and £150	Line Manager
Above £150	Line Manager and Ethics & Compliance

* Where the total value of all gifts received or of all gifts given in a calendar year exceeds £300, then all future gifts received or given, as the case may be, must be approved by your Line Manager and the responsible member of Ethics & Compliance.

Entertainment

Value*	Approval Process
Up to £100	Self-approve
Between £100 and £300	Line Manager
Above £300	Line Manager and Ethics & Compliance

* Where the total value of all entertainment received or of all entertainment given in a calendar year exceeds £600, then all future entertainment received or given, as the case may be, must be approved by your Line Manager and the responsible member of Ethics & Compliance.

Revision & Approval History

Revisions

Issued / Revised	Version	Effective Date	Summary of Key Changes
First Issuance	1	20 th July 2025	The new Business Integrity Policy consolidates the previous Anti-Bribery Policy, Conflict of Interest Policy and Interactions with Healthcare Professionals and Entities Policy. The Policy also introduces a new gifts and entertainment approval process and thresholds.

Approval History

Role	Name	Title	Date of Approval
Author	Ariadna Grañena	Ethics & Compliance Director	n/a
Owner	Geoffroy Ribadeau Dumas	Chief Ethics and Compliance Officer & SVP Legal	n/a
Approver	Kris Licht	Chief Executive Officer	16.07.2025
Approver	Cathy O'Rourke	Group Company Secretary	16.07.2025
Approver	Ranjay Radhakrishnan	Chief HR Officer	16.07.2025
Approver	Shannon Eisenhardt	Group CFO	16.07.2025
Approver	Harald Emberger	Chief Supply Officer	16.07.2025
Approver	Angela Naef	Chief R&D Officer	16.07.2025
Approver	Ryan Dullea	Chief Category Growth Officer	16.07.2025

Approver	Jérôme Lemaire	President North America	16.07.2025
Approver	Susan Sholtis	President Head Johnson Nutrition	16.07.2025
Approver	Eric Gilliot	President Europe	16.07.2025
Approver	Nitish Kapoor	President Emerging Markets	16.07.2025
Approver	Sheila Redzepi	Chief Communications and Corporate Affairs Officer	16.07.2025