
CORPORATE POLICY

Reckitt's Anti-Bribery Policy

Purpose and Scope

Purpose

Reckitt (including its companies globally, together the "Company") is committed to complying with all laws and regulations which govern our operations in every country in which we operate. The Anti-Bribery Policy (the "Policy") 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.

Reckitt has a zero-tolerance attitude towards bribery and corruption. Even the suggestion of corruption may damage the reputation of the Company and affect its ability to do business, as well as the reputation of its employees. The Company is therefore committed to doing business ethically, even if this means not gaining new business, not using the services of particular agents or business partners or incurring delays in carrying on our existing business.

Any violation of this Policy may result in disciplinary action, up to and including dismissal in appropriate circumstances. It is therefore extremely important that you familiarise yourself with this Policy and strictly adhere to it.

Scope

The principles and obligations outlined in this Policy apply to all employees of Reckitt companies globally, members of Reckitt's Board of Directors and Reckitt's contractors (which include agents, consultants, outsourced personnel and other representatives). As such, each of us is responsible for adhering to these standards in our business interactions and for ensuring that all Company contractors understand that they are responsible for complying with this Policy when acting on behalf of the Company.

This Policy sets forth Reckitt's minimum compliance standards with respect to interactions with Third Parties. However, where local law, regulations or local or Business Unit internal policies require more stringent controls, such controls must be followed. It is the responsibility of each local market/ Business Unit to identify and strictly adhere to all more stringent local/ Business Unit requirements and controls.

Policy Statement

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 of/ misuse of a person's position.

Bribery is prohibited at Reckitt and no person subject to this Policy shall offer or provide a

bribe or anything which may be viewed as a bribe either directly, indirectly or otherwise through any Third Party. Similarly, no person subject to this Policy should request, receive a bribe or anything which may be viewed as a bribe either directly or indirectly or otherwise through any Third Party, or perform their job functions improperly in anticipation, or in consequence, of a bribe.

The prohibition on accepting a bribe from, or giving a bribe to, any person applies to any person acting in the course of business, as an employee of a business or otherwise on behalf of others in relation to their performance of their duties and to public officials. Any dealings with public officials present a particularly high risk. Another high-risk group for contact with Reckitt employees and contractors are healthcare professionals (such as doctors, nurses, nutritionists, etc.) specifically ones who work in a public setting such as State medical services, hospitals and other recognized industries. Even the appearance of improper conduct in the context of public officials would have a significant reputational impact on Reckitt's public image. Reckitt employees and contractors must take great care in these situations.

Under this Policy, public officials include any officer, employee or representative of the government or a government-owned entity. The term will also extend to a legislative, administrative or judicial official, regardless of whether elected or appointed; an officer of, or individual who holds a position in a political party; a candidate for political office; or person who otherwise exercises a public function for or on behalf of any country. This list is not exhaustive so you should consult with your Designated Legal/Compliance Officer if you have any questions or concerns.

Potential Bribery Risks

1. Facilitation Payment

Facilitation payments are small unofficial payments to public officials to ensure or speed up performance of routine or necessary action which is part of the public official's usual responsibilities. These are bribes, regardless of whether they may be a part of the "way of doing business" in a particular country. As a representative of the Company, you must not make any facilitation payments unless you or your companions are at personal risk if you fail to do so.

2. Third Parties

Reckitt could be held responsible for the actions of a Third Party (meaning any distributor, distributor agent, service provider, contractor, supplier, joint venture partner) acting on its behalf. As such an adequate level of care must be taken to ensure that those Third Parties share Reckitt's commitment and values to always act with integrity and not engage or attempt to engage in bribery. Due diligence should be carried out as appropriate, where required under the applicable Third Party Due Diligence Procedure.

3. Gifts and Hospitality

Giving or receiving business gifts or corporate hospitality can play a role in building or

maintaining business relationships. However, gifts and hospitality are problematic if they create actual or perceived conflicts of interest or appear to influence a business decision.

Accepting gifts, discounts, favors or services from a current or potential customer, competitor, supplier or service provider is prohibited if that benefit is a type or amount which has the potential to influence a person's business decision. Functions like Procurement, Supply and Sales (inc. Medical Sales) and R&D (including Medical Affairs) Medical must take extra care. Additional or stricter requirements may be applied locally, in your function or business, under which you might not be allowed to take or give any gifts or hospitality under certain circumstances. If you have any questions, please consult your Designated Legal/Compliance Officer.

Providing gifts to any Governmental official/authority is not encouraged as this could be perceived as a bribe. If you have any doubts regarding the status of the person receiving a gift (e.g. HPC that could be considered a GO), you should obtain the view of a member of the Legal/ Compliance Team before making a gift.

Gifts are only permitted if they are:

- Modest and reasonable;
- Infrequent;
- In good taste;
- Unsolicited;
- Not cash or a cash equivalent; and
- Not given with an intent to influence a business decision.

Occasionally, for the purpose of building relationships, you may accept or offer social entertainment or hospitality, such as modest meals or event tickets. However, you must not accept or offer entertainment or hospitality unless the activity:

- Permits business or educational discussions at the meal or event (a Company representative must attend the meal or event);
- Is part of a genuine business relationship;
- Is not intended and could not be perceived to improperly influence business decisions;
- Is consistent with industry practices, all applicable laws and our Company policies and procedures;
- Is not excessive in value or quantity, as defined by local procedural documents; and
- Would not embarrass our Company if it was brought to public attention.

4. Political Donations

As stated in our Code of Conduct, Reckitt is not a political organization and it does not support political parties (including candidates or representatives of political parties) nor does it contribute to the funds of groups whose activities are calculated to promote party interests or the election of a specific candidate. Political contributions include not only funds, gifts, loans or items of value, but also in-kind contributions such as goods (excluding company products) or services being given or made available.

5. Charitable Contributions

Charitable contributions may only be given to recognized charitable organizations. All donations must be:

- Transparent and properly recorded in our books and records;
- Receipted or have a letter of acknowledgement from the charity to ensure that the donations receive the proper tax treatment; and
- Be compliant with Reckitt policies and procedures, local law and regulations.

Donations must not:

- Be made to individuals or in cash; or
- Be made to a public official as an inducement to or reward for acting improperly including at his / her request.

Please review Reckitt's donations policies and procedures before starting a donation process and if needed, don't hesitate to reach out to your Designated Legal/Compliance Officer for guidance.

6. Sponsorships

Reckitt may seek to strengthen its brand by promoting activities through Sponsorships, for example through the sponsoring of initiatives covering education, science, arts and culture. In such instances care must be taken to avoid any perception or risk of bribery and corruption, including that the Sponsorship may be used to gain an improper advantage. The improper advantage could be a new opportunity or retention of existing business that Reckitt would not have otherwise been able to attain.

7. Record Keeping

Financial and non-financial records which Reckitt maintains are disclosed to shareholders, regulators and other stakeholders. These records must be accurate and complete so that the Company can substantiate and justify any transactions with Third Parties. This means that if an improper payment has been made (for example, facilitation payment when your life was endangered) it must be accurately accounted for.

All accounts, invoices and other records involving transactions with Third Parties, including suppliers and customers must be prepared accurately. Under no circumstances should a person prepare an account "off-book", particularly where this is designed to conceal an improper transaction.

Record keeping for gifts and hospitality (given and received)

All persons who are subject to this Policy must declare and record hospitality and gifts:

- (a) received by any Reckitt employee or other person subject to this Policy;
- (b) given to any Government Official

in Reckitt's electronic Gift and Entertainment Register, where a Disclosure Form can be accessed on the intranet. Reckitt expects those who are subject to this Policy and with access to the intranet to use it for recording all hospitality and gifts received above US\$25 (twenty five American dollars).

Other hospitality and gifts provided by employees or contractors must be submitted into the expense system (e.g. Concur) as expenses claims relating to hospitality, gifts and payments made to Third Parties, ensuring they are captured properly under the right expense type (e.g. Business Entertaining), that the hospitality and gifts recipients are

disclosed and that justification for this expense type is provided.

8. Conflict of Interest

A conflict of interest ("COI") occurs when private interests, including personal, financial, social or family interests, are or appear to be at odds with Reckitt's interests. It is Reckitt employees' responsibility to avoid situations that present or create a real or perceived, direct or indirect conflict between their interests and those of Reckitt. Conflicts of interests, as well as the appearance of a conflict of interest can damage Reckitt's reputation and undermine the Company's commercial interests.

Reckitt employees must disclose in a timely manner all potential conflicts of interest in accordance with the Conflicts of Interest Standard Operating Procedure and any applicable Reckitt local policies and processes.

9. Hiring Practices

Reckitt staff must be alert to the bribery and corruption risks associated with hiring practices that cover temporary or permanent work (including contractors), whether paid or unpaid (e.g. an internship, graduate scheme, secondment, temporary hire or work placement). Under anti bribery and corruption law, such hires are deemed to be a "*thing of value*" and the giving of a thing of value with improper motives amounts to bribery and corruption.

Particular care is to be used for candidates referred to Reckitt by public officials, employee(s), Third Parties, clients or potential clients to ensure that any recruitment process is legitimate, merit based, robust, consistent and is properly recorded.

Failure to adhere to the above exposes Reckitt and any staff member to risks including regulatory breaches, criminal enforcement and potential disciplinary action.

Training and Review of Policy Implementation

Newly hired employees will receive anti-corruption training as part of their onboarding. All employees shall receive additional training at least every two years. Additional training may be required for certain people to reflect the risks facing them in their role. In high risk environments, employees will receive appropriate training to deal with potential situations where risks of bribery may arise.

Red Flags

There are a number of issues which should cause us to do further investigation into whether a particular transaction or relationship may present a potential bribery risk or issue.

All persons who are subject to this Policy must remain vigilant and attempt to spot any of the scenarios listed below. Should you come across a potential issue of the kind listed below, you should (i) consider whether further investigation and due diligence of your

counterparty is necessary; and/or (ii) escalate the matter to your manager and Legal/Compliance Officer.

The following are examples of red flags (this list is not exhaustive):

- The prevalence of bribery in a country that has a nexus with the particular transaction or relationship (Third Party is located in such country or the transaction involves such country); e.g. according to the Corruption Perception Index (CPI) as evaluated annually by Transparency International;
- Payments of unusually high fees or commissions, requirement for a significant payment to be made upfront on award of contract, minimal work product or no value for money;
- Requests for cash payments or for unexpected payments related to government approvals;
- Requests for payments to different companies, multiple accounts or in different countries;
- Undefined or unreported payments to Third Parties made on Reckitt's behalf;
- No written agreements or unusual contractual terms;
- Unusually close relationships with government officials, their friends or family;
- The counterparty demonstrating little or no experience or expertise in the services they will be providing to Reckitt as we expect Third Parties are experts in their respective fields of work;
- Flawed background or reputational findings (including for example prior corruption or a negative reputation for integrity);
- A refusal to certify compliance with this Policy and Reckitt's Third-Party Code of Conduct.

Contact Information

If you have questions about this Policy or the related procedures, please contact a member of the Compliance Team or send us an email to Ethicsandcompliance@reckitt.com

Discipline for Non-Compliance

Any Reckitt employee or contractor who violates this Policy and related guidelines may be subject to appropriate disciplinary action, up to and including dismissal in appropriate circumstances, independent from potential other penalties (e.g. fine and imprisonment) resulting from their behaviour.

Approvals

Role	Name	Title
Author	Luis Cuevas	Global Ethics & Compliance Director
Owner	Marco Gregorio	Chief Ethics and Compliance Officer
Approver	Rupert Bondy	General Counsel
Approver	Jeff Carr	Chief Financial Officer
Approver	Laxman Narasimhan	Chief Executive Officer