
CORPORATE POLICY

ANTI-HARASSMENT, DISCRIMINATION, VIOLENCE AND BULLYING

Purpose and Scope

Purpose

In accordance with our [Code of Conduct](#), at Reckitt we are committed to providing a work environment free from harassment, discrimination, violence and bullying. All members of staff are expected to treat others respectfully and to be treated with respect.

Scope

This Policy applies to all Reckitt permanent employees as well as temporary team members including contractors, interns, casual workers and agency workers engaged by Reckitt; the Policy also applies to volunteers and other visitors - collectively, "Reckitt".

This Policy applies to all aspects of our employment practices including:

- Recruitment, assessment, and selection;
- Terms and conditions of employment;
- Compensation and benefits;
- Professional learning and development;
- Career progression and performance review;
- Redundancy and redeployment.

Policy Statement

At Reckitt, we expect all our people to treat others respectfully and inclusively.

We do not tolerate offensive conduct, including harassment, bullying or other behaviours which are inconsistent with our Policies and Code of Conduct. Should you witness threatening conduct, please alert your site or unit line leadership, Ethics and Compliance and/or Corporate Security and HR immediately as you deem fit. The procedure on reporting such acts can be found [here](#).

This Policy sets out Reckitt's global standards. In some countries, more stringent laws and regulations may apply and, where this is the case, these standards will supersede those set out in this Policy.

Harassment

Harassment is any form of unwanted, physical, verbal or non-verbal, actual or threatened conduct that has the effect or purpose of violating a person's dignity or creating an intimidating, hostile, degrading or offensive environment for the subject. Harassment can occur through a series of events or a single event.

A person may have been harassed even if they are not the intended recipient of the harassment.

Examples of harassment may include but not be limited to:

- Threatening or violent conduct;
- Unwanted 'horseplay' including improper touching, pinching, pushing, grabbing or any physical contact made without consent or with abuse of power;
- Verbally abusive comments;
- The use of derogatory language;
- Making discriminatory slurs, jokes, or comments at work, on or off site;
- Sending or forwarding offensive emails, text messages, social media publications or otherwise communications which may include ethnic, racial, sexual or discriminatory comments;
- Denigrating, showing hostility or aversion toward a person or group of people because of a certain characteristic(s);
- Continued suggestion for social activity after it has been made clear that such suggestions are unwelcome or if an abuse of power has taken place;
- Deliberately and repetitively using the wrong pronouns for a person when one's preference has already been made clear;
- Recording others without their permission and using, sharing or selling one's personal information, data or photographs without their permission;
- Sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet including social media).

Sexual Harassment

Harassment may also involve conduct of an overt or covert sexual nature (sexual harassment). Sexual harassment is defined as unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature. This includes situations in which submission to or rejection of such conduct is used as the basis for employment decisions or when such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.

Examples of sexual harassment may include but not be limited to:

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- Unwanted intentional physical conduct including improper touching, pinching and groping;
 - Verbal comments about an individual's body or appearance;
 - The use of sexual or sexually degrading words;
 - Unwanted sexual flirtations, sexual advances or suggestive behaviour;
 - Questions, jokes or suggestions about a person's sex life;
 - Sexual favouritism i.e. a supervisor or manager making "promises" or "favours" based upon a person's receptiveness of sexual advances;
 - Less favourable treatment based upon a person's receptiveness of sexual advances i.e. a supervisor intentionally blocking a promotion or further training opportunities as a result of rejecting sexual advances;
 - Offensive visual conduct such as leering or making sexual gestures;
 - Making enquiries into another's sexual experiences and activities or discussion of one's own sexual experiences and activities;
 - Sending or displaying of unsolicited sexually explicit images;
 - The covert photographing of another person;
 - The threat of exposing sexually explicit images of another;
 - Voyeurism and images of others in compromising positions.

Bullying

Bullying is any offensive, intimidating, malicious, exclusionary or insulting behaviour involving the misuse of power that may make a person feel vulnerable, humiliated, undermined, threatened or excluded.

Power does not always mean being in a position of authority but can include both personal strength and power to coerce through fear or intimidation.

Bullying may include but not be limited to:

- Adopting aggressive or intimidating conduct, including shouting or being verbally aggressive;
- Spreading misinformation or malicious rumours about a person;
- Purposefully belittling someone or making humiliating comments (including name-calling, teasing, making derogatory comments on others, spreading malicious rumours, etc.);
- Singling out or unfairly or inappropriately criticising a person in front of others;
- Excluding a person from work-related activities (including workplace social events or team building activities) with the intent to cause isolation;
- Showing continued disrespect towards a person, including providing illegitimate, unevicenced or unfair criticisms;
- Perpetuating micro-aggressive behaviours towards a person, including disregarding or ignoring their circumstances or needs.

Conduct that is out of scope (and not considered to constitute bullying in and of itself) includes warranted counselling, disciplinary discussions, performance evaluations, feedback, the provision of legitimate and reasonable constructive criticism of an employee or worker's performance, differences of opinion and non-aggressive conflicts that may arise in working relationships (provided that these follow our Code of Conduct and Compass).

Discrimination

Discrimination is conduct committed against a person based on one or more characteristics or dimensions of identity. Characteristics may include, but not be limited to age; disability or medical condition; colour, ethnicity, race, citizenship, and national origin; religion or faith; pregnancy, family status and caring responsibilities; sexual orientation; sex, gender identity, gender expression and transgender identity; political affiliation, protected veteran status; socio-economic background, size, union membership or any other basis protected by Law.

Examples of discriminatory harassment may include but not be limited to:

- Jokes or derogatory remarks about a person's characteristic(s) (as cited above);
- Mocking, mimicking, or belittling a person based on their characteristic(s);
- Outing or threatening to out someone's characteristics if they are unknown, not visible or the individual chooses not to share them;
- Using language that is offensive or un-inclusive, whether intentional or not;
- Overlooking career opportunities or limiting career moves based on a person's characteristic(s);
- Providing less favourable compensation/ performance review/ developmental opportunities to people based on their characteristic(s) than they would otherwise receive;
- Putting a person forward for development opportunities, irrespective of potential challenges arising from this person's characteristic(s) if known (e.g. encouraging an employee from the LGBTQ+ community to accept a career move to a country which does not recognise stated sexuality).

Furthermore, at Reckitt we will not condone the voicing or dissemination of a personal or political belief that contradicts Reckitt's Code of Conduct or which may be considered offensive to another person or group of people based on (but not limited to) the list of characteristics outlined above.

Procedure for Raising a Concern

There are several routes an employee or worker can take to make a report of bullying, discrimination or harassment. This includes:

- i) **Line-Manager consultation**
In the first instance, the employee's line-manager should be informed of any incidences of bullying, harassment or discrimination. The line-manager will then advise the most appropriate options.

- ii) **Use the Speak Up! Service**
Should one be the subject of harassment, bullying or discrimination and not feel comfortable raising their concern with HR or with Ethics and Compliance, they can raise a report confidentially through Reckitt's Speak Up! Platform (available [here](#)). The reporter can choose to remain anonymous throughout the process.
The matter will be independently investigated by a trained member of Ethics and Compliance, Corporate Security, HR or by another suitable individual who will determine the outcome of the complaint and work with the Reporter to reach a resolution.

- iii) **Contact the local HR, Ethics and Compliance team or a Trusted Leader**
We recognise that one may not always feel comfortable in reporting a matter to their line-manager, especially if they are the subject of the report. As such, the employee should contact their HR business partner, the Ethics and Compliance Team or any other Leader, which will then investigate the matters raised.

Once a report has been made, the investigation process will follow the one set out in the Speak Up! SOP or in the HR Grievance Policy.

Non-Retaliation

At Reckitt, we strictly prohibit any form of retaliation or threat of retaliation against an employee who raises a concern, provides information or assists in the fact-finding and assessment of any conduct they reasonably believe to be in violation of our Code of Business Conduct, Policies or applicable laws.

Retaliation includes discharging, demoting, suspending, threatening, harassing, coercing or, in any manner, discriminating against any employee who - in good faith - reports a potential incident or assists in the fact-finding and assessment of such an incident.

Roles and Responsibilities

We are all responsible for seeking to eradicate harassment, discrimination, violence and bullying both within and outside of our offices and sites.

Employees should be aware of their personal responsibility to promote an inclusive environment free from harassment, discrimination, violence and bullying for their colleagues, consumers, customers, partners, suppliers and the communities in which we operate.

All line managers have a specific responsibility to operate within this Policy and to ensure that all staff understand the behaviours expected of them. It is also managers' responsibility to promptly take action when such behaviours fall below the expected standards.

Discipline for Non-Compliance

Anyone who is found to have harassed, discriminated against and/or bullied another person in contravention of this Policy and/or any mandatory local requirements will be subject to disciplinary action, up to and including dismissal. If the accused is a Third Party, the line leaders with Legal/ Ethics and Compliance and HR (as applicable) will consider the necessary action to adequately address their behaviour.

Anyone who deliberately provides false information or otherwise acts maliciously during an investigation (e.g. purposely making false allegations) may be subject to disciplinary action up to and including dismissal.

Regardless of whether an individual's report is substantiated, HR will consider how best to manage ongoing working relationships with the person(s) against whom the allegations were made.

Contact Details and Further Information

Questions about this Policy and requests for information on dealing with harassment, discrimination or bullying should be directed to the General Counsel, the Chief HR Officer or local HR business partners.

Approvals & Version Controls
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