

Corporate Policy

Conflict of Interest


v.3 [Final]

Valid from: <01/05/2023>

Next review: <01/05/2026>






Policy Owner: <Legal and Compliance>

Do's

-  Familiarise yourself with this Policy to know how to recognise actual, potential, or perceived conflicts of interests.

-  Disclose conflicts of interest in the dedicated Register as soon as they arise.

Don'ts

-  Get involved in employment decision regarding a Relative/ friend/ Significant Other.
-  Conduct secondary work which may lead you to act inconsistently with your duties towards Reckitt.
-  Leverage your position to influence Reckitt's business transactions for personal gains.
-  Engage in any outside business activity that competes with Reckitt business.
-  Refrain from disclosing your conflict of interests – Ethics & Compliance will work with you to find the most suitable course of action.

Purpose and scope

Purpose

At Reckitt, we recognise that our relationships with others are built on trust. To maintain trust, we need to be able to recognise situations which may compromise it. This Policy sets out how to deal with actual, potential or perceived conflicts of interest.

Scope

This Policy applies to Reckitt's job applicants, employees and third parties working on our behalf.

Policy statement

A conflict of interest occurs when other interests may unduly influence your business judgments, decisions, or actions. At Reckitt, we define conflicts of interest broadly: actual conflicts of interest (when you face an existing conflict); potential conflicts of interest (when you are in a situation that may result in a conflict); and perceived conflicts of interest (when you are in a situation that may appear to be a conflict, even if it's not).

Typically, we deal with two types of conflicts of interest: personal or business conflicts.

1. Personal conflicts of interest. A personal conflict of interest relates to circumstances in which your familial or social relationships conflict with Reckitt's business, such as:
 - Being in a position to exert influence over the hiring or conditions of employment of a Relative/ Friend/ Significant Other.
 - Engaging in a negotiation or agreement on behalf of Reckitt with a Relative/ Friend/ Significant Other who is acting on behalf of someone else.
2. Business conflicts of interest. A business conflict relates to circumstances where you, your Relative or Significant Other has a financial interest in a Reckitt Competitor, Supplier, Customer or another Third party doing business with Reckitt. Examples include:
 - Leveraging one's position to influence Reckitt's business for personal gains.
 - Engaging in external business activities with businesses that compete with, supply, or are supplied by Reckitt, like being on the board of a Competitor, Supplier, or Customer of Reckitt, holding more than 1% of the shares in a Competitor, Supplier, or Customer of Reckitt^{1, 2} or holding more than 1% of the shares in a potential Reckitt investment target.

What to do when faced with a conflict of interest

Conflicts of interest (even just their appearance) can be problematic: as such, they must be disclosed and satisfactorily resolved. If you are facing a conflict of interest, you must disclose it promptly and before engaging in any conduct that might breach your duties towards Reckitt. This does not necessarily mean that you would need to step back from

¹ This provision applies where one's share amounts to 1% or more of the value of any of these entities.

² Investment in publicly traded pension funds, index linked, tracker funds or in any other collective investment vehicle where a third-party manager has full discretion over the investments are excluded from this provision of the Policy.

the situations that resulted in a conflict or potential conflict, but it is very important to ensure potential risks are assessed and appropriately addressed.

- Employees must disclose their conflicts of interest in the dedicated [Register](#); moreover, each year, Reckitt personnel must submit a mandatory conflict of interest declaration. Employees are also strongly encouraged to consult with their line manager and Ethics and Compliance business partner if facing an actual, potential or perceived conflict of interest.
- Job applicants must disclose conflicts of interest during the hiring process.
- Third parties must disclose their conflicts of interest during the Compliance Due Diligence process or by contacting the [Ethics and Compliance team](#).

Conflict of interest disclosures are triaged and assigned to a moderator (a member of the Ethics and Compliance or HR team), depending on the subject matter. The moderator will then decide how best to address the conflict and share their reasoning to the disclosing party as soon as possible, typically within 60 days.

Contact Information

If you are ever in doubt about the right course of action, or if you have questions about this Policy, please consult a member of Reckitt's [Ethics and Compliance team](#).

Definitions

Term	Definition
Competitor	Any person or business that offers, or is seeking a license to offer, the same or similar products or services and to the same Customers as Reckitt.
Customer	The recipient of a product or service purchased from Reckitt. The term applies to both an intermediate Customer who purchases goods for resale, and a Customer who is the end user.
Relative	Spouse, parent, stepparent, child, stepchild, sibling, aunt, uncle, niece, nephew, grandparent, grandchild, first cousin, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, other step-relation, and any other person (other than a non-family tenant) sharing the employee's household.
Significant Other	Anyone with whom an employee is involved in a romantic relationship or sharing a Reckitt employee's household.
Supplier	Any person or business that provides products or services to or does business with Reckitt, including consulting services, with or without a written contract.
Third party	Any contractor, supplier, distributor or any other companies or individuals associated contractually with Reckitt in the development, supply, manufacture or delivery of our products.

Revision & Approval History

Revisions

Issued / Revised	Version	Effective Date	Summary of Key Changes
Issued	1	April 2020	First issue.
Revised	2	September '21	Clarified ownership for triaging and dealing with Conflicts of Interest (residing with Ethics & Compliance primarily, as opposed to shared ownership with HR).
Revised	3	May '23	Summarised Policy content.

Approval History

Role	Name	Title	Date of Approval
Author	Martina Algeri	Ethics & Compliance Director	N/A
Owner	Richard Walker	Group Chief Ethics and Compliance Officer	N/A
Approver	Nicandro Durante	Chief Executive Officer	20 th April 2023
Approver	Cathy O'Rourke	General Counsel	20 th April 2023
Approver	Jeff Carr	Group CFO	20 th April 2023
Approver	Ranjay Radhakrishnan	Chief HR Officer	20 th April 2023
Approver	Sami Naffakh	Chief Supply Officer	20 th April 2023
Approver	Angela Naef	Chief R&D Officer	20 th April 2023
Approver	Filippo Catalano	Chief Information Officer	20 th April 2023
Approver	Fabrice Beaulieu	Chief Marketing, Sustainability and Corporate Affairs Officer	20 th April 2023
Approver	Volker Kuhn	President, Hygiene	20 th April 2023
Approver	Patrick Sly	President, Nutrition	20 th April 2023
Approver	Kris Licht	President, Health	20 th April 2023