

# Code of **Conduct.**

**We always do  
the right thing.**



# We always do **the right thing.**

At Haleon we have a powerful purpose:  
To deliver better everyday health with humanity.  
Nothing is more important than our health  
and the health of the people we love.  
What we do matters.  
So does how we do it.  
That's why we have our  
Code of Conduct.



**Brian McNamara**

**Chief Executive Officer**



Watch our video with Brian here

## **What we do matters.**

### **So does how we do it.**

At Haleon we are dedicated to our hundreds of millions of consumers around the world. They trust our brands and depend on our products every day. We need to give them the reassurance of knowing that we're totally committed to their health.

That is why we must always do the right thing. It means holding our actions and decisions to the highest possible standards. It means never compromising what we stand for. And it means protecting our consumers, our customers, our company and each other.

This is the responsibility of everyone at Haleon, and it's why our Code of Conduct is so important. It guides our decisions, reminds us of our culture, and supports us when we need to speak up.

I strongly encourage you to read our new Code of Conduct. Take time to understand what it means for you, and return to it when you need guidance. It's here to help all of us do the right thing, always.

**Brian McNamara**

CEO, Haleon



# Welcome to our Code of Conduct.

Use the interactive controls to navigate and access the functions you need.

Previous page

Contents

Next page

Play video

Open link

Click on any page title on this contents page to navigate to that section.

## p4 Overview.

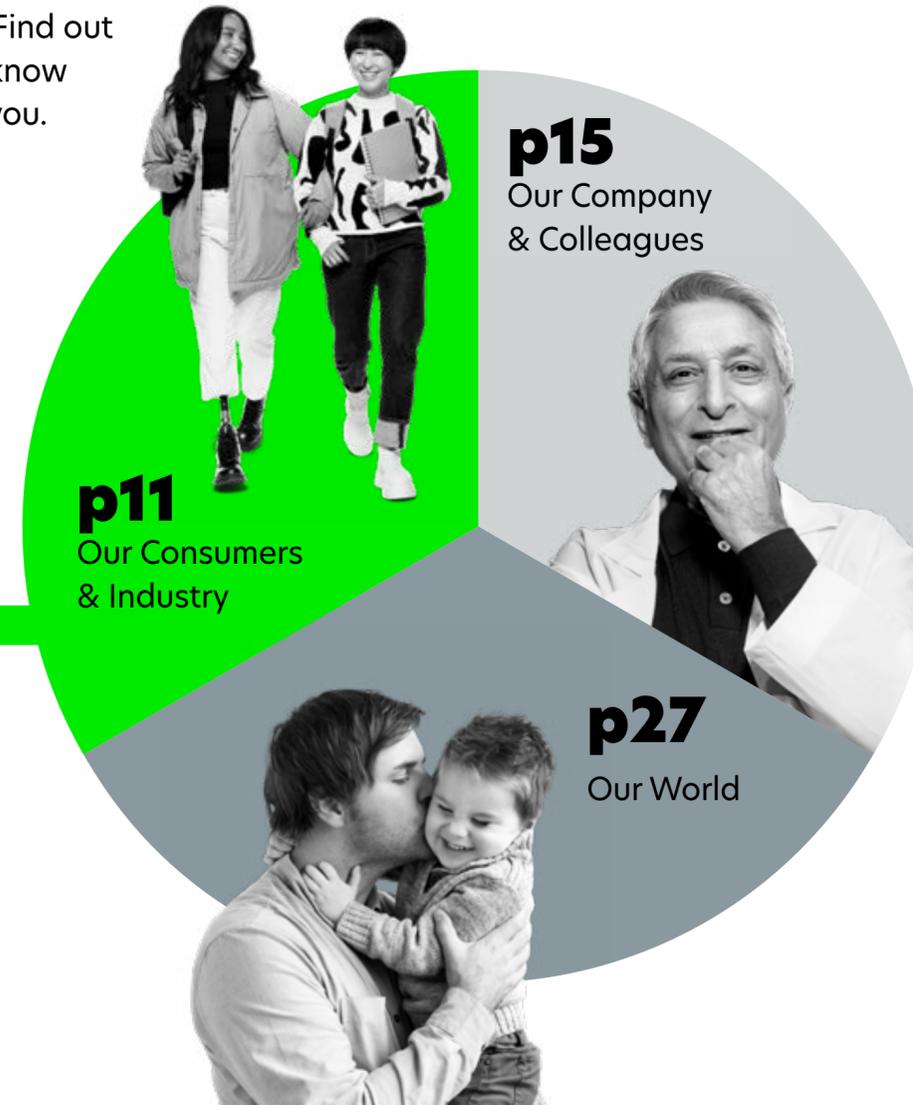
- 4 We live by our Code
- 6 Our culture and behaviours
- 7 Do the right thing
- 8 Step up and Speak Up



## p8 Step up and Speak Up

## p10 Our Principles.

Discover the principles that underpin our policies. Find out why they matter. And know what we expect from you.



## p33 Next Steps.

34 Get further support and access essential resources





**“I’m passionate about making sure our company is admired for its high ethical standards. By working together and being committed to our Code of Conduct, we’ll be known for always doing the right thing.”**

We live by our Code.  
**All of us, every day.**



**Dominique Giulini**

**Chief Ethics & Compliance Officer, Haleon**



Watch our video with Dominique here



**We live by our Code.** continued.

### Why our Code is essential

At Haleon we operate in a highly competitive environment. Our challenges grow, every day. Everything we do can potentially put our reputation at risk. We all have a responsibility to uphold the standards that we've set to protect our business. Our Code clearly sets out our culture and ethical principles. It's here to help us create a culture of always doing the right thing.

### It's here for everyone

Our Code applies to everyone at Haleon, across every location, and in every role and level of seniority. From colleagues and team leaders, to our Haleon Leadership Team and Board Members, we are all responsible for living by our Code and being role models. Our suppliers, distributors, agents, consultants and contractors are also subject to many of the principles of our Code. Together, we must create a safe environment where our Code and applicable written standards are respected, and everyone feels comfortable to raise any concerns we might have.

### Putting principles into practice

Within the Code, we explain the principles that underpin our ethical standards. It's important to note that our Code does not replace reading our related policies, undertaking mandatory training or using our guidance materials.

### Where to get further guidance

Our Code is extensive, but it does not cover every situation. When each of us is faced with a difficult decision, we must also consider what we believe is the right thing to do - for our consumers, customers, colleagues and company. If you have any questions about the principles and how they apply to real-life situations, my team of Ethics & Compliance Business Partners is always available to advise you.

If you become aware of misconduct, talk to us or use the Speak Up line. In doing so, you'll be helping protect our people, our consumers and our reputation.

### Understanding misconduct

Failing to comply with our Code of Conduct is deemed to be misconduct and is treated very seriously at Haleon. It may result in disciplinary action, up to and including dismissal. It could also include financial clawback for significant misconduct.

Thank you for reading and following our Code, and for helping make sure Haleon is the company that always does the right thing.

Sincerely

**Dominique Giulini**

Chief Ethics & Compliance Officer, Haleon



Need to Speak Up about a concern?  
Find out how to do it on Page 8

# Our culture and behaviours. **The heart of our business.**

**Our culture helps us deliver our purpose and strategy. It's driven by our behaviours. Our Code helps us shape the decisions we have to make and the actions we choose to take. Together, they make sure that at Haleon we always do the right thing.**

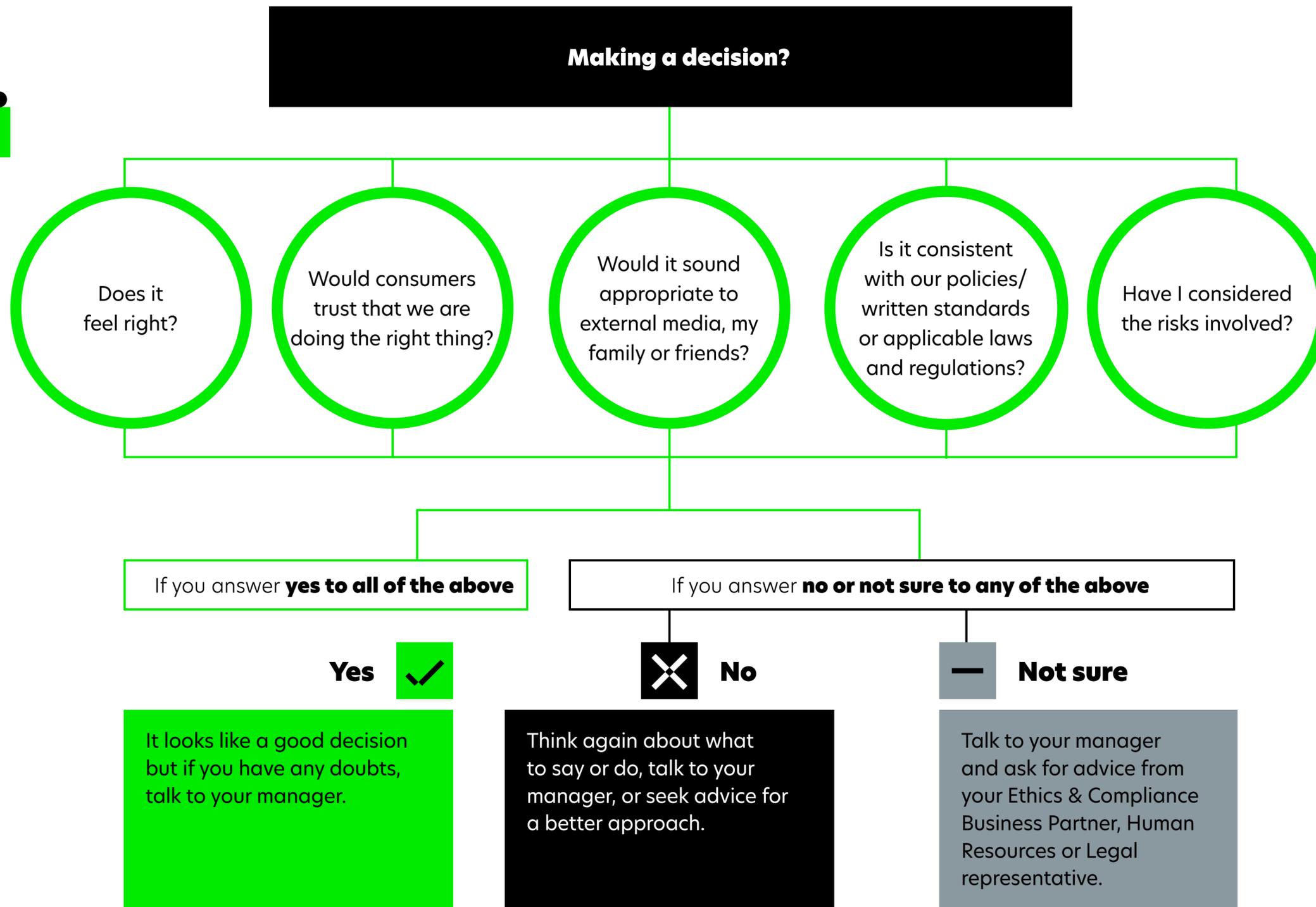


Visit our Culture and Behaviours page here



# Do the right thing. Our decision tree.

**Our written standards help us address the different risks we may face. But it's not possible to cover every decision or action you might need to take. In these instances, use your best judgement, be guided by our ethical approach and ask for advice if needed.**



Need help?  
Find further information and support on ethical decision-making here



# Step up and Speak Up.

## **Everyone has a duty to Speak Up**

At Haleon, we always do the right thing. However, there may be rare occasions when an employee or third party intentionally or unintentionally acts in a way that is not in line with our Code of Conduct Principles and our culture, our policies or the law. We are all responsible for speaking up, if we have a concern or reason to suspect that this has occurred.

It can feel hard to speak up and raise a concern. But always remember that by not reporting suspected misconduct, you're allowing inappropriate behaviour and actions to continue. This may harm our colleagues, our consumers, our company and our culture. In some cases, it may also lead to significant financial losses and serious reputational damage for Haleon.

## **We always act on Speak Ups**

All concerns raised will be reviewed in detail by colleagues in Ethics & Compliance, Legal and/or HR, and, if appropriate, a formal investigation may take place. We will ensure that your concern is addressed in the appropriate way. We may ask you to provide further information to enable us to fully investigate your concern. You should treat any information about the investigation as confidential. As the person who reported the concern, we will give you feedback at the end of the process, even if we are unable to share the outcome in detail for confidentiality or other reasons.

**You should always give voice to your concerns.  
That's how we keep getting better.**

**Step up and Speak Up.** continued.

Sometimes concerns may be raised that turn out to be unfounded. This should not discourage you from speaking up; it is always better to raise your concern, as long as the information you share is provided in good faith.

**Retaliation will not be tolerated**

We do not tolerate retaliation against those who raise concerns at Haleon. All concerns raised are treated in strict confidence. Although you can speak up anonymously if you prefer, we encourage you to identify yourself to help us address your concern effectively. The more detail you can provide about your concern, the faster we can review it and make sure the necessary stakeholders are empowered to resolve it.

We operate a zero tolerance policy towards behaviour which could be perceived as retaliation or harassment of any employee who raises concerns in good faith. Good faith reporting means that you have a genuinely held concern and you believe the information you are providing is accurate and truthful. A concern can be raised in good faith even if it turns out you were mistaken about the facts. However, anyone who reports a concern is not automatically immune from disciplinary action if they are involved in misconduct or make false allegations maliciously.

**If you become aware of misconduct, you must speak up. By doing so, you'll be helping to protect our people, our consumers and our reputation.**



Need to Speak Up? Here's how to do it...

You should report your concerns directly to your line manager or a member of your local management team in the first instance. Alternatively, if you feel uncomfortable speaking up to your line manager or local management team, you may report your concerns to Ethics & Compliance, HR or Legal.

You can also use the Speak Up channels via telephone, web portal, email or mail. These channels are managed independently of Haleon and are available globally in multiple languages.

Always remember that by speaking up and raising concerns, you are doing the right thing.



Contact us to Speak Up



Further information on Speak Up



# Our Principles.

**This is the heart of our Code.  
Our principles guide us to do the right thing.  
You should know what they are.  
Understand why they matter.  
And be clear on what we expect.**

**p11**  
Our Consumers  
& Industry



**p15**  
Our Company  
& Colleagues



**p27**  
Our World





# Our Consumers & Industry.

**Discover the principles that underpin our product safety, quality and promotion, and define how we engage with our industry and the scientific community.**



**Our Principles.** continued.

Our Consumers & Industry:

## Product Safety and Regulatory Governance.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
<p>We ensure the safety of our consumers by complying with relevant Good Practice regulations. These assure the quality, safety and efficacy of our products throughout their product life cycle.</p>	<p>The safety of our consumers and the integrity of our research are crucial aspects of our dedication to Trusted Science. They are at the heart of everything we do. By adhering to Good Practice regulations, we're ensuring our product quality, minimising potential risks to consumers, and protecting our reputation.</p>	<p>We report any information about side effects, adverse reactions, or other human safety concerns to Consumer Safety Services within 24 hours. We always adhere to our policies and procedures.</p>	<ul style="list-style-type: none"> <li>→ Type "adverse event reporting Haleon" into intranet or Google search.</li> <li>→ Collecting Information from Consumers</li> <li>→ Human Subject Research</li> <li>→ Care, Welfare &amp; Treatment of Animals</li> <li>→ Product Information</li> </ul> <p style="text-align: right;"><b>More information</b> </p>

**“When people buy our products, they trust the science and safety that is behind them. I am driven by living up to that expectation every day.”**

**Chris Kocun, Chief Medical Officer, Haleon**



**Our Principles.** continued.

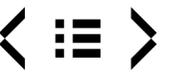
Our Consumers & Industry:

## Product Promotion and Scientific Engagement.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
<p>We promote our products in line with the applicable laws and regulations of the countries in which we do business. We engage responsibly with the scientific community to understand and communicate scientific information about our products.</p>	<p>It is important that our consumers trust our claims. Any recommendations of our products by HCPs (Health Care Professional) must be based on legitimate scientific information, and not on inappropriate influence.</p>	<p>Follow the 'Must Dos' of our Code of Promotion and follow local laws and regulations regarding how to promote our products. Any scientific engagement needs to be led and overseen by the Medical Function. When we need to interact with customers or competitors, we stick to our principles. Any interactions with HCPs are conducted responsibly, and any payments to HCPs for services must follow 'fair market value' in their respective country.</p>	<ul style="list-style-type: none"> <li>→ Code of Promotion</li> <li>→ Global Content Approval Procedures</li> <li>→ Procedure for Engaging with External Experts to Provide Services</li> <li>→ Anti-Bribery and Corruption (ABAC) Policy</li> <li>→ Competition Law Policy</li> <li>→ Code of Scientific Engagement</li> </ul> <p style="text-align: right;"><b>More information</b> </p>

**“It’s important to me that we ‘win the right way’.”**

**Filippo Lanzi, Head of EMEA & LatAm, Haleon**



**Our Principles.** continued.

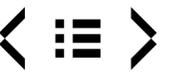
Our Consumers & Industry:

## Quality Standards.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
<p>Our products can be trusted because quality is lived and built into everything we do. We develop, manufacture, test and distribute our products with care and consistency, and compliance - all based on trusted science and human understanding.</p>	<p>We are committed to safeguarding the people who use our products. Our effective Quality Management System (QMS) is crucially important, and covers our management responsibilities, expectations of quality, and documented policies and procedures.</p>	<p>We always follow our standards and procedures to ensure quality and compliance, and we understand why it's so important to follow them. We are passionate about quality and are always ready to learn from our issues as well as our successes. By striving to do the right thing, first time and every time, we are forever challenging ourselves to be the best we can be.</p>	<p>→ Quality Policy</p> <p><b>More information</b> </p>

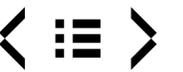
**“I am passionate about ‘quality’ - it is so fundamental to the trust we earn again and again every day.”**

**Pauline Fallon, Head of Quality, Systems and Compliance, Haleon**



# Our Company & Colleagues.

**Explore the principles that govern everything from our diversity and inclusion, to fair competition, financial integrity, data use and much more.**



**Our Principles.** continued.

Our Company & Colleagues:

## Careful Communication.

### Our Principle

We make sure all communications about our business interests are timely, accurate and respectful. They must reflect our behaviours, and follow our policies, approval procedures and all applicable laws.

#### Examples

- We should be aware that our personal views on social media could be attributed to Haleon. Even when engaging in a non-work capacity, it is easy to identify individuals as Haleon staff. So we use our judgement on what is acceptable to post.
- We are careful when expressing opinions about political, religious or socially sensitive topics.

### Why it matters

The way we communicate with each other and with the world is crucial to building trust in our brands and maintaining our reputation.

### What we expect

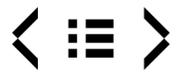
We are careful when sending electronic messages or leaving voicemails, just as we are when sending a letter or memorandum. To prevent risks to the company, we are similarly cautious when interacting on social media. We always remember that anything we write may be misinterpreted. We never write anything that we wouldn't be comfortable reading later in a newspaper or on social media.

### Our Policies & Guidance

- External and internal communication activities
- Write Right

### More information





**Our Principles.** continued.

Our Company & Colleagues:

## Conflicts of Interest.

### Our Principle

We act with fairness and transparency when facing a conflict of interest. We make sure our ability to perform our duties is not influenced by, or in conflict with, our personal relationships or any actual or anticipated benefit. A conflict of interest arises when personal activities, interests or relationships interfere or appear to interfere with our professional judgement, decisions or actions. Even in circumstances where we do not receive personal benefit, the appearance of a conflict of interest may negatively impact our credibility or that of our company.

#### Examples [of potential conflicts of interest]

- Doing business between Haleon and a family member, friend or business in which you or a family member or friend has any interest or benefit.
- Personal relationships at work with the potential to improperly influence sound decision-making.
- Romantic relationships at work where there is an imbalance of power, e.g. with direct reports.
- Outside employment or political activities on your own time, if this work or activity is connected to or affects our business.

### Why it matters

Conflicts of interest can undermine our culture, so it's important to disclose any actual, potential or apparent conflicts of interest. This allows others to evaluate the matter and help us do the right thing, rather than keeping quiet and potentially creating a difficult ethical or legal situation. This helps maintain the trust and confidence of all our stakeholders and ensures that every decision is taken in the best interests of Haleon.

### What we expect

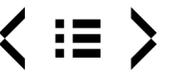
If any relationships or interests arise that could conflict or appear to conflict with the performance of our duties for Haleon, we must proactively notify our line manager and upload it into Workday. Each situation must be evaluated individually. We always keep in mind that potential conflicts can usually be resolved through open discussion and transparency with line managers, HR and Ethics & Compliance. Remember that a conflict of interest is not necessarily a Code of Conduct violation, but not disclosing it is.

### Our Policies & Guidance

- Conflicts of Interest

### More information





**Our Principles.** continued.

Our Company & Colleagues:

## Data Use.

### Our Principle

We responsibly handle all data entrusted to us. We commit ourselves and our service providers to comply with our Data Privacy and Data Security principles, as well as local data protection regulations.

#### Examples

- Process data lawfully and transparently.
- Collect data for specific instances and for explicit and legitimate purposes only.
- Ensure the security of personal data and respect storage period and deletion policies.

### Why it matters

The responsible use, storage and protection of data and personal data ensures that we comply with applicable laws and maintain the trust of our stakeholders. It is also a valuable asset for our business, helping us innovate and operate in an increasingly digital and data-driven world.

### What we expect

We safeguard important data from corruption, compromise or loss. And we secure the privacy, availability and integrity of the data available to us. We delete data we do not need in line with our data retention policies.

### Our Policies & Guidance

- Privacy
- Data Integrity
- Acceptable Use of Tech Resources
- Protection of Information

### More information





**Our Principles.** continued.

Our Company & Colleagues:

## Diversity, Equity and Inclusion.

### Our Principle

We always show respect for our colleagues and the communities around us. At Haleon it's crucially important that we offer equal opportunities for every employee, and create a fair work environment where everyone can thrive and be inspired to do their best work.

### Examples

→ We do not tolerate any kind of discriminatory behaviour based on race, colour, language, caste, nationality or social origin, indigenous status, religion, disability, gender, marital status, sex, sexual orientation, union membership, political opinion, pregnancy, veteran status, age, or any other characteristics protected by law.

### Why it matters

Diversity, equity and inclusion are the essential foundations that support our commitment to human rights and humanity. By leveraging our diversity, we're better able to develop new ideas, innovate, understand our markets, stakeholders and consumers, and drive our successful and competitive workforce.

### What we expect

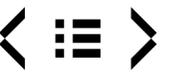
We create a respectful and supportive environment in which we listen to others and respect everyone's opinions. We do not tolerate violence, harassment, threatening or otherwise inappropriate behaviour of any kind. This also applies to any form of sexual harassment. Every Haleon employee, and all supply chain and business relationships, must ensure an equitable and inclusive culture that is free from discrimination.

### Our Policies & Guidance

- Equal and Inclusive Treatment of Employees Policy
- Human Rights Policy

### More information





**Our Principles.** continued.

Our Company & Colleagues:

## Fair Competition.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
<p>We conduct our business activities in full compliance with the competition laws of the countries in which we operate. It is not permitted to provide to or receive from competitors non-public information regarding pricing, costs, product supply, strategies, customers, marketing plans or other sensitive information, including through third parties. It is also prohibited to use our market position to gain unfair advantage over competitors.</p>	<p>Fair competition is fundamental to the free market. Competition promotes innovation, keeps prices fair, and maintains the quality and choice of products and services. It benefits consumers and customers, as well as our business.</p>	<p>We follow the guidance and comply with the requirements and principles of the Competition Law Policy. We consider consulting with Legal before discussing a project with a competitor, or attending a trade association meeting or other event where a competitor might be present.</p>	<p>→ Competition Law Policy</p> <p><b>More information</b> </p>

**“Following our competition law policies means that we can be proud when we win market share, because it means we won by serving consumers best, not by manipulating the rules.”**

**David Linsenmeier, Head of Business Unit, LatAm, Haleon**



**Our Principles.** continued.

Our Company & Colleagues:

## Financial Integrity.

### Our Principle

The financial information that we maintain internally or provide to shareholders, regulators and other stakeholders, must be accurate, complete and timely.

#### Examples

- Do not conceal, falsify or modify records to mislead or influence users of financial information.
- Do not delay or accelerate the recording of revenue or expenses between reporting periods.
- Do not operate outside the limits of your delegated authority.
- Do not process transactions, such as buying, selling or transferring goods/assets, without the appropriate authorisation.
- Do not authorise or fund any transaction that is undisclosed or unrecorded in our books, records and accounts.
- Do not approve or make any payment that you understand may be used for anything other than what is described in supporting documents.
- Do not process or deal with any funds where you have any knowledge or suspicion that they may relate to wrongful activity.

### Why it matters

The integrity of our financial information is essential. It supports sound business decisions and enables us to comply with our commercial, legal and regulatory obligations. And it meets our stakeholders' expectations of Haleon as a reliable and trustworthy partner.

### What we expect

All our financial information must be supported by appropriate processes, procedures and controls. This ensures that underlying transactions are appropriately authorised, accurately recorded and supported by auditable records. When committing the company to expenditure, we must follow the Grant of Authority standard and relevant procurement procedures.

### Our Policies & Guidance

- Finance Manual
- Grant of Authority standard
- Governance of Contracts and Legal Agreements Policy
- Buying Goods and Services Policy

### More information





**Our Principles.** continued.

Our Company & Colleagues:

## Gifts, Hospitality and Entertainment.

### Our Principle

We always carefully consider whether it is appropriate to give and accept gifts, hospitality or entertainment.

#### Examples

- Giving a gift to a government official after a business meeting is not permitted in any circumstances, even if this is a cultural practice of that country.
- It is not appropriate to receive a ticket from a third party for an event, without a business purpose.
- It is not appropriate to give a luxury gift to an HCP speaker after a successful lecture at conferences or events.
- When permitted by local laws, it is acceptable to give a box of chocolates with modest value to celebrate the successful completion of a project supported by the third party under a formal agreement.

### Why it matters

In some situations, giving or receiving gifts or hospitality may be misunderstood or perceived as undue influence or a bribe.

### What we expect

We never promise, offer or give gifts, hospitality or entertainment with the intention of obtaining or retaining business, securing improper business advantage, or causing the recipient to do anything that favours Haleon. We do not give or receive gifts from government officials or their family members. This covers every circumstance, including cultural acknowledgement purposes. We do not provide entertainment at business meetings, conferences, or comparable events, unless the entertainment is appropriate and directly related to the event.

### Our Policies & Guidance

- ABAC Policy
- Meetings and Catering Policies

### More information





**Our Principles.** continued.

Our Company & Colleagues:

## Health, Safety and Wellbeing.

Our Principle	Why it matters	What we expect	Policies & Guidance
<p>Haleon's Purpose is to deliver better everyday health with humanity. Bringing this to life internally means creating a thriving work environment that enables us to be healthy, safe and well, so that we can be our best selves in the workplace. At Haleon we take care of each other. Nothing is more human than keeping one another safe, healthy and well.</p>	<p>When we are empowered to manage our own health, safety and wellbeing, we're likely to be more engaged, committed, creative and willing to go the extra mile. This helps to keep us all safe and well and positively impacts our performance, culture, consumer experience, and ultimately our company's reputation and success.</p>	<p>We always do the right thing. We take responsibility for managing and mitigating workplace risks, championing safe practices and abiding by our policies, standards, procedures and lifesaving rules. We understand that keeping our employees safe is crucial to our reputation, culture and licence to operate. Embedding health, safety and wellbeing into the everyday employee experience is the essential foundation of a thriving work environment.</p>	<p>→ Human Rights Policy  → Life Saving Rules  → Environment, Health, Safety standards  → EHS Policy</p> <p><b>More information</b> </p>

**“Nothing is more human than keeping each other safe, healthy and well. We care for people here.”**

**Bart Derde, Head of Quality and Supply Chain, Haleon**



**Our Principles.** continued.

Our Company & Colleagues:

## Insider Trading.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
<p>We do not engage in insider trading or use non-public information that could manipulate the price of Haleon's shares, either to our own advantage or for another person. This also applies to any other company with which we do business.</p>	<p>The public and our investors must be able to rely on our business integrity. Using inside information to illegally trade or influence the shares of Haleon or any other company with which we do business is a criminal offence punishable by a fine and/or prison sentence.</p>	<p>We are prohibited from trading in Haleon's shares when in possession of non-public information - this is known as insider trading. We may not disclose material, non-public or 'inside' information to other people, including family members and friends relevant to them trading shares. All employees and contractors must adhere to the respective principles, policies and applicable regulations.</p>	<p>→ Share Dealing Code</p> <p><b>More information</b> </p>

**“Information is a valuable company asset. Insider trading is both a misuse of that asset and a crime.”**

 **Bjarne Tellmann, General Counsel, Haleon**



**Our Principles.** continued.

Our Company & Colleagues:

## Protecting our Company Assets.

### Our Principle

We take responsibility for our physical and intangible corporate assets.

#### Examples

- Physical assets include items such as money, products, vehicles, mobile devices, laptops and tablets. Examples of intangible assets include employee time and intellectual property.
- It is a Code violation to use a corporate laptop to run a family business, or use corporate fuel cards for a personal vehicle.

### Why it matters

Having appropriate assets and access to the right information is key to achieving our purpose. We need to safeguard our property, and the information of our consumers and customers.

### What we expect

We ensure that Haleon's property is only used for proper business or management approved purposes, and we protect our assets against damage or misuse. We only use confidential information for its intended purpose as part of our duties, and we protect it at all times.

### Our Policies & Guidance

- Global Records Retention
- Protection of Information
- Acceptable Use of Tech Resources

### More information





**Our Principles.** continued.

Our Company & Colleagues:

## Third Party Management.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
We strive to only conduct business with third parties that commit to maintaining high ethical standards and operating responsibly.	We rely on our suppliers to help us achieve our targets and deliver our purpose. Maintaining consistent standards and behaviours helps build trust and valuable relationships - both with our stakeholders and suppliers. We follow set processes for the appropriate level of due diligence, contracting and monitoring, and using approved buying channels. This ensures that we work only with suppliers that align with our standards and bring the most value to our organisation.	Any third party that supports our business must apply responsible business behaviours and high ethical standards of business conduct, and comply with all relevant laws and regulations. We follow the Third Party Risk Management standard to conduct appropriate levels of due diligence and risk management. No payment is made without following the appropriate and documented process, including the review of performance documentation by management with respective grant of authority.	<ul style="list-style-type: none"> <li>→ Third Party Risk Management standard</li> <li>→ Grant of Authority for Transactions</li> <li>→ Buying Goods &amp; Services</li> <li>→ Anti-Bribery and Corruption (ABAC) Policy</li> </ul> <div style="text-align: right;"> <a href="#">More information</a>  </div>

**“We demonstrate our ethical standards by how we choose and engage with our third parties.”**

**Flavia Unis, Director Ethics & Compliance Programmes & Policies, Haleon**



# Our World.

**Learn about our principles that shape our interactions with the world, from anti-bribery and corruption, to human rights and sustainability.**



**Our Principles.** continued.

Our World:

## Human Rights.

### Our Principle

We make it a priority to respect, support and uphold human rights, both at Haleon and wherever we do business.

#### Examples

→ We seek to ensure there is no child labour, no harmful or inhuman treatment and no forced labour or human trafficking. We further seek to ensure that there is safe and decent work for young workers, fair working hours, remuneration and employment conditions, and that we conduct business with integrity.

### Why it matters

Human rights are the basic standards that all people are entitled to in order to live with dignity. They include the right to health, privacy, education and the protection of children. We respect human rights in our endeavours and recognise the possible consequences for failing to do so, including reputational damage and loss of trust of our stakeholders. By failing to do so, we risk significant fines, reputational damage, loss of consumer trust and low investor preference.

### What we expect

We are committed to becoming a role model in respecting human rights in our work environment. We encourage people to speak up if they identify abuse or have concerns. We strive to prevent, mitigate and remediate adverse impacts that our business activities or business relationships may have on the human rights of everyone associated with Haleon. This includes colleagues, customers, consumers, people working in our supply chain, and those living in the communities where we operate.

### Our Policies & Guidance

- Human Rights Policy
- Third Party Risk Management standard

### More information





**Our Principles.** continued.

Our World:

## Sustainability.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
<p>We embed sustainable business practices within our company and through our brands. This helps ensure that we make better everyday health more inclusive, sustainable and achievable.</p>	<p>As the leading consumer health company, we always do the right thing. We help combat the effects of climate change and its impact on human health. We develop sustainable healthcare packaging and use trusted ingredients that are sustainably sourced. Humanity is at the heart of everything we do, and we are committed to empowering millions of people each year to be more included in opportunities for better everyday health. We have robust policies and practices to support human and labour rights in our supply chain and to protect the health, wellbeing and safety of people who source and make our products. By acting together to protect the environment and people in our day-to-day decisions, we can all make a difference.</p>	<p>We comply with all applicable environmental laws, regulations and Haleon's policies governing environmental and social impact. We escalate any incidents that may result in an environmental violation or adverse impact, as well as incidents which may impact the health, safety, wellbeing or human rights of people working for Haleon and in our supply chain in accordance with defined escalation procedures. We continually identify opportunities to improve our environmental and social performance.</p>	<ul style="list-style-type: none"> <li>→ Human Rights Policy</li> <li>→ Environment, Health, Safety and Sustainability Policy</li> <li>→ Third Party Risk Management standard</li> <li>→ Sustainability Hub (intranet)</li> </ul>
			<p><b>More information</b> </p>



**Our Principles.** continued.

Our World:

## Anti-Bribery and Corruption (ABAC).

### Our Principle

We have zero tolerance of all forms of corruption. We are committed to acting with honesty, transparency and integrity in all our business dealings, and upholding all relevant laws and regulations (e.g. U.S. Foreign Corrupt Practices Act/UK Bribery Act). Corruption includes, but is not limited to, bribery, money laundering, fraud, and tax evasion.

### Examples

→ Bribery and corruption can include, but are not limited to, cash payments, bank transfers, holidays disguised as business trips, facilitation payments, commissions, gifts, event tickets, job opportunities, donations, hospitality, discounts, memberships without a clear business purpose, political contributions, lobbying abuse, nepotism, undeclared conflicts of interest, misreporting of travel expenses, disproportional payments to a third party, or preferential terms.

### Why it matters

Our ABAC Policy is designed to ensure that we uphold the highest standards of professional integrity and trust. ABAC violations can lead to large fines and significant reputational impact, and may lead to Haleon losing its operating license.

### What we expect

We do not directly or indirectly promise, offer, authorise, solicit, or accept anything in order to obtain or retain business, or to secure an improper advantage in the conduct of business. This includes any form of advantage, financial or otherwise, and encompasses anything of value. Particular care should be taken in interactions with any government-connected persons or entities as this is a heightened area of risk. Examples include but are not limited to: cash, gifts, services, job offers, loans, travel expenses, entertainment, and hospitality. We apply our ABAC principles, maintaining documentation to confirm legitimacy of intent, proportionality, transparency, and the absence of undue influence. We speak up and report any suspected activity, and allow transparent conversations to assess any situations that could be open to fraud, bribery, or corruption.

### Our Policies & Guidance

→ Anti-Bribery and Corruption (ABAC) Policy

### More information





**Our Principles.** continued.

Our World:

## Customs and Trade Compliance.

Our Principle	Why it matters	What we expect	Our Policies & Guidance
<p>We comply with the spirit and the letter of all legislation and regulations associated with trade compliance. This includes customs, procedures, sanctions, and export control laws and regulations.</p>	<p>Breaching rules on the trade of goods, or trading with embargoed entities or countries, can give rise to significant penalties and reputational risk. Inaccurate customs declarations or failure to import or export goods without the appropriate documentation can result in similar negative consequences, as well as disrupting our supply chain. This can also mean additional customs duty payments, fines or penalties, loss of export privileges, shipment delays or even criminal penalties.</p>	<p>We always seek to maintain an open and constructive relationship with trade compliance authorities globally. We ensure that all customs declarations are complete, accurate and filed on a timely basis. We do not conduct prohibited business activities with sanctioned parties, nor activities which can lead to breach of sanctions or export control. We carefully choose the markets in which we operate, and we adhere to the laws that govern the distribution and use of our products. It is each person's responsibility to understand any restrictions that apply to them, and to the activities they carry out for Haleon.</p>	<p>→ Trade Compliance Policy → Sanctions Policy</p> <p><b>More information</b> </p>

**“We comply with all applicable regulations on imports, exports, taxes and embargoes; it’s an essential component to both our licence to operate and our commitment to doing the right thing.”**

**Tobias Hestler, Chief Financial Officer, Haleon**



**Our Principles.** continued.

Our World:

## Grants and Donations.

### Our Principle

We support grants and donations that have a valid and legitimate purpose, in supporting Haleon's business interests. They must comply with applicable laws, regulations and codes of practice in the communities in which we operate. We do not make political contributions to any individual or organisation in any country in which we operate. Staff contributions to, and lawful activities of the Political Action Committee (PAC) established in the United States are unaffected by the principle of non-political contribution by the Group. Staff may attend, on behalf of the Group events arranged, sponsored and/or funded through the Political Action Committee (PAC).

#### Examples

→ Corporate memberships of non-trade organisations or of scientific societies, or those made for charitable events are permissible.

### Why it matters

Our policy helps us to operate transparently and free from political ties, enabling us to focus on putting consumers first. Grants and donations are awarded in response to an unsolicited request, and the value of the grant or donation is in proportion to its purpose. There is also a risk that donations may be misused for bribery, or to support terrorism or violate sanctions obligations. Grants and donations are made transparently, and we retain the right to publicly disclose the recipient's name and the amount of the grant or donation. We also require the recipient to disclose our support.

### What we expect

Anyone involved in this area has a responsibility to check whether any grants and donations made are in line with our expected standards. This includes confirming eligibility, completing a risk assessment, confirming proportionality, and identifying any potential conflict of interest. We refer to our country's 'Grants & Donations Committee' to receive necessary authorisation. We also require authorisation from the appropriate governing body.

### Our Policies & Guidance

→ Grants and Donations

### More information





# More information. **More power.**

**Our Code is just the beginning. You may need to know more. We have everything you require, from written standards and videos, to training materials and case studies, giving you the power to make the right decision - to take the best course of action. And always do the right thing.**





# Further information. **Essential support.**

If you need to know more about the topics we cover in the Code, you can access a wealth of useful help and support in our Ethics & Compliance Hub.



## Watch our videos

We have a wide range of short video clips covering a wealth of related content. This includes messages from management, training on our principles, and deeper explanations of our goals, strategy, culture and behaviours.



## Use our written standards

Our library of written standards includes policies and SOPs that provide information about your responsibilities to always do the right thing, with humanity.



## Explore My Learning

On our learning hub you'll find a range of dedicated training on many of the topics covered in our Code.



## Discover our case studies

These provide helpful examples of real-life situations, giving you essential advice for any ethical dilemmas you may encounter.



## Search Haleon Intranet

Simply type in relevant keywords on Search Haleon Intranet to find related resources.

