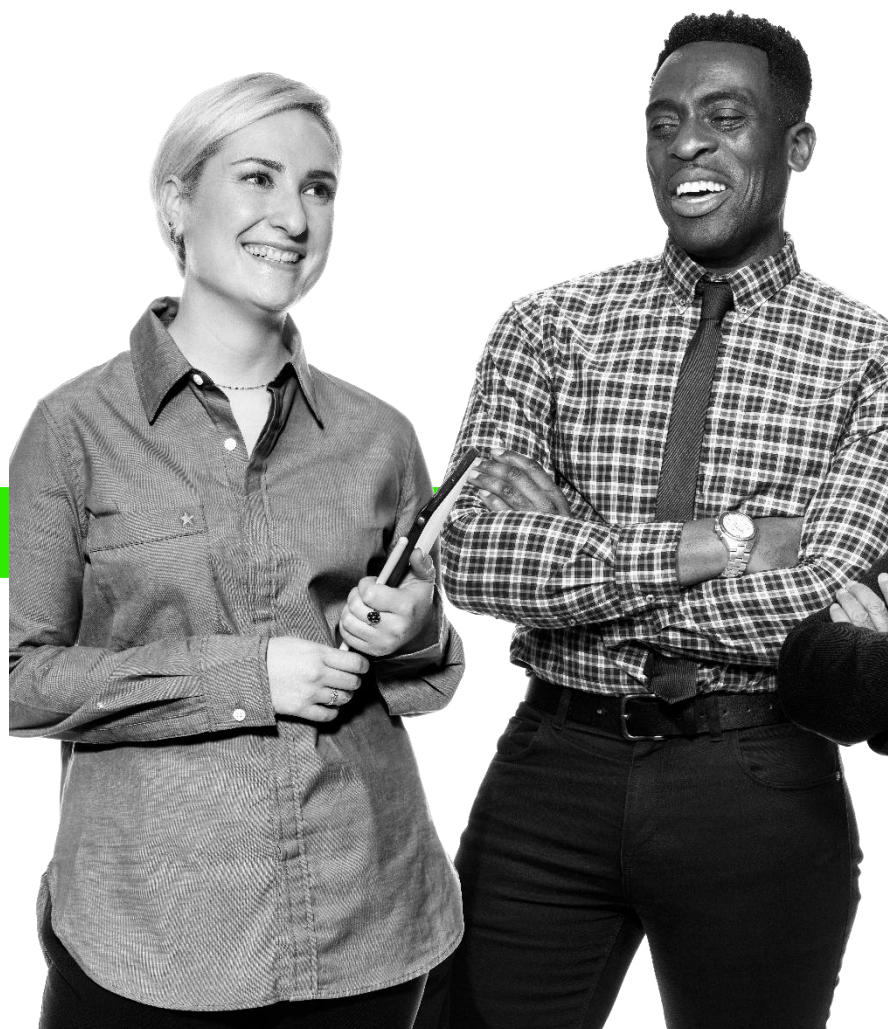

HALEON

Prevention of Bribery, Corruption and Other Financial Crimes

Our Policy



Foreword by the General Counsel

At Haleon, our mission is to deliver everyday health with humanity and become the world's leading consumer healthcare company— helping more people, improving health, and creating long-term value for everyone we work with. To achieve this, we must Win as One, the Right Way.

This policy explains how we deal with bribery, corruption, and financial crime. But it's not just about rules — it shows what we believe in, and how we do business.

We've made this policy clear and easy to follow. It applies to everyone, no matter your role or location. If you're ever unsure, ask for help. Use the tools and support available.

By following this policy, we protect each other and the people who rely on us. Thank you for your commitment to Win as One, the Right Way.

Adrian Morris

Why does it matter?

Bribery, corruption, and financial crime break trust, damage our reputation, raise business costs, and can lead to serious legal trouble for individuals and the company. Most importantly, they stop people from getting the healthcare they need and hold us back from achieving our shared goals.

What is the purpose of the policy?

We do not tolerate financial crime in any form. Anyone involved will face serious consequences. This policy explains the rules and standards to prevent such behaviour across Haleon.

Who is the policy for?

This policy applies to everyone working for or on behalf of Haleon — including employees, temporary staff, contractors, agents, consultants, and third parties — regardless of their role, location, or level.

What are bribery, corruption and other financial crimes?

- **Bribery** means offering or accepting anything of value to unfairly influence someone's actions or decisions. The thing of value is not only money, but it can also include gifts, hospitality, travel, donations, job offers, or other benefits. Bribery also includes **facilitation payments** - small, unofficial payments made to speed up routine government services, like getting permits or licenses.
- **Corruption** means using power or a position of trust, for personal gain. It can involve bribery, fraud, stealing money, favouring friends or family, or unfairly influencing decisions.
- **Fraud** is when someone lies, hides, or misuses information—or abuses their role—to gain something they shouldn't, like money, contracts, or business advantages.
- **Money laundering** is when someone hides where illegal money came from. This usually involves moving the money through different transactions to cover its true source and make it seem like it came from a legal activity.

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- **Tax Evasion** is when someone illegally hides income or gives false financial information to pay less tax.

We collectively call these actions “financial crimes”.

What is forbidden?

- Financial crimes are never allowed, no matter what local customs or practices may be.
- Paying with cash or cash-like items is not allowed.
- You cannot give or receive gifts or entertainment to or from government officials or their family members.
- You must not make political donations on behalf of the company, unless it’s through a legally established U.S. Political Action Committee (PAC).

What are the main risks, and how can I avoid them?

Gifts, Hospitality & Entertainment (GHE) - Giving or receiving GHE can help build strong business relationships, but only when done right. If it’s too generous, poorly timed (like during ongoing negotiations or tenders), or is not recorded properly, it could look like a bribe. Follow the GHE Policy to make sure they are appropriate and transparent.

Conflicts of Interest – A conflict of interest occurs when your personal activities, interests, or relationships interfere with your professional judgment or decisions at Haleon. If not properly managed, conflicts can damage your credibility and our reputation. The Conflicts of Interest Policy has details of different types of conflict, and how they should be disclosed and managed.

Government Officials¹- When you're dealing with Government Officials—like elected representatives, political parties or employees of state-owned companies—extra care is essential. These individuals are held to stricter legal standards, and our actions must reflect that. Here’s how to stay on the right side of the rules:

- **Never offer anything of value** to influence a Government Official’s decision. That includes gifts, hospitality, donations, or favours.
- **Be especially cautious** during inspections, licensing processes, or contract bids. These moments carry higher risk.
- **Use extra care in high-risk countries**, where corruption may be more common. If you're unsure, ask for help.
- **Some Healthcare Professionals (HCPs) are also Government Officials.** For example, they may approve products or allocate funding that affects Haleon’s business. In these cases, follow the rules for both HCPs and Government Officials—and always apply the stricter standard. For HCPs who aren’t Government Officials, stick to the Code of Promotion.

Third Parties - Agents, consultants, suppliers, service providers, and distributors as examples of higher risk partners. However, any third party can pose a risk when they act on our behalf. If they break the rules, even if we didn’t know or ask them to do so, we can be held responsible for their actions. To reduce this risk:

- **Due Diligence:** Check them using our **Third-Party Risk Management (“TPRM”)** process for screening to ensure we do not work with those with a history of wrongdoing. This will also enable us continuously to monitor them.
- **Contract Clause:** Include the relevant contract clauses.

¹ **Government Official** is anyone working for, or connected to, a government, public institution, or political party, including candidates for office and others as defined by local laws. This includes employees of domestic and foreign governments and their agencies, public international organizations and people in official roles (e.g. legislative, judicial, administrative) as well as anyone acting on their behalf.

- **Only pay for what you receive:** Make sure the pricing is clear and matches the service delivered. Avoid vague descriptions—ask for solid proof of what you're being charged for, and check that the cost lines up with what others in the market are paying.
- **Relationship Management:** Keep an eye open for red flags such as unusual requests for payments, use of offshore accounts or poorly documented services, especially in high-risk areas.

Travel & Expenses (T&E) – This can be an issue when there is no clear and legitimate business purpose. If not well documented and appropriate for the business context, they might be seen as bribes or misused to hide bribes. The Travel & Expenses Policy has details of different types of expenses, and respective requirements. And remember:

- Don't use them to offer gifts or benefits that could seem improper.
- Keep claims accurate, honest, and well-documented.

Charitable contributions or sponsorship – These are meaningful ways we bring our Purpose to life and support our business goals. However, if not properly documented, they could be misinterpreted as bribery or undue influence. Our Giving Policy outlines the types of initiatives we support, the partners we seek to work with, and the steps we take to ensure all contributions are made transparently, ethically, and in line with our values.

What should I do if there's a safety risk?

If saying no to a demand for money puts your safety, or someone else's, at risk, you can make the payment. These situations are rare, but if it happens:

- Keep a record of what happened.
- Immediately report it to your manager and your Legal & Compliance Business Partner.

What is my role?

- **Everyone**
 - Follow this policy
 - Complete your annual compliance training
 - Use the right controls to manage risks
 - Report anything that seems wrong
- **Managers**
 - Make sure your team understands and follows the policy
 - Ensure your team completes all training
 - Create a safe space for people to ask questions or raise concerns
- **Legal & Compliance**
 - Give advice and support on how to apply the policy
- **Third Parties**
 - Follow HALEON's Supplier Code of Conduct

What happens if I don't follow these rules?

Failure to comply, may result in disciplinary action, including losing your job or contract. Legal action may also be taken.

How to speak up

If you think this policy has been broken:

- Talk to your line manager, local management, Ethics & Compliance, HR, or Legal, or
- Use the Speak Up service—it's independent, is available in many languages, and can be used anonymously

HALEON will not tolerate retaliation against anyone who reports a concern in good faith.

Our commitment

Our commitment to ethical business is backed by strict compliance with global laws and regulations — including the United Nations Convention against Corruption.

Review and report

This policy will be regularly reviewed following appropriate risk assessment activities and updated to reflect new insights and regulatory changes, with its effectiveness reported to HET risk forum and to the Board.

Administration and effectiveness

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Approver: Adrian Morris, General Counsel

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