

CORPORATE POLICY

Speak Up Policy






v.2 [Final]

Valid from: <01/05/2023>

Next review: <01/05/2026>

Policy Owner: <Legal and Compliance>

Do's

-  Speak Up to your Line Manager, to a trusted Leader or to a member of the HR, Legal or Ethics & Compliance Function upon becoming aware of issues that can potentially impact the business' integrity.
-  Use the Speak Up Service if speaking to the above individuals has not reasonably addressed the issue or if it is inappropriate to do so.
-  Cooperate with the Speak Up investigation if you are requested to do so.
-  Know that we have zero-tolerance of retaliation towards anyone that reports a Speak Up! case or supports a Speak Up! investigation.
-  Keep all information related to a Speak Up case confidential.

Don'ts

-  Refrain from Speaking Up if you know (or suspect) something is wrong.
-  Speak Up in bad faith or with malicious intent.
-  Use the Speak Up! Service to report events presenting immediate threats to life or property that require urgent attention.
-  Interfere with the Speak Up investigation, offer false information, alter or destroy records.
-  Retaliate against anyone raising a Speak Up or assisting in an investigation.

Purpose and Scope

Purpose

At the centre of our Compass is our commitment to Do The Right Thing, Always. We recognise, however, that despite this commitment instances of misconduct may occur. You are encouraged to speak up as soon as you observe, or suspect, misconduct or any other activity that may pose a risk to Reckitt's reputation: the quicker you report it, the quicker we can take corrective action. This Policy explains how to share your concerns in good faith without fear of retaliation, and what happens after raising a concern. All concerns will be taken seriously, investigated appropriately and acted upon where necessary.

Scope

This Policy is applicable to all Reckitt employees, contractors and sub-contractors, as well as third parties. It is your duty to speak up if you observe, or suspect, misconduct or any other activity that may pose a risk to Reckitt's reputation – this means actual or suspected violations of our Code of Conduct, our Policies, and the laws that govern our organisation, whether past, present or likely to occur. Examples of matters that should be raised under this Policy include:

- Financial malpractice, impropriety or fraud;
- Dangers to health and safety or the environment;
- Conflicts of interest;
- Criminal or illegal activity such as money laundering, violation of sanction laws, breaches of competition law, bribery and insider trading;
- Human rights violations;
- Discrimination, harassment or sexual harassment;
- Deliberate concealment of any violations, such as those listed above;
- Retaliation against anyone speaking up in good faith or assisting in an investigation.

This Policy should **not** be used to report:

- Events presenting an immediate threat to life or property. For emergency assistance, contact your local authorities or your country's emergency services.
- Grievances in relation to your terms of employment or personal disputes. For these matters, please refer to the Global Grievance Policy and the PeopleHub.

Policy Statement

How to Speak Up

There are several ways to raise your concerns of misconduct in good faith. Good faith means that you reasonably believe or suspect that there has been, or will be, a breach of our Code of Conduct, our Corporate Policies or law.

1. Generally, the first person to approach when raising a concern is your **line manager**, who may be able to address your concern or engage the appropriate individual or team who can.
2. If approaching your line manager is inappropriate, for whatever reason, then you should raise your concern with a **trusted leader** or **member of the HR, Legal or Ethics and Compliance Function**.
3. You can also use the **Speak Up! Service** to raise a confidential report using the [online platform](#) or by calling the telephone hotline. We understand that raising a concern can be uncomfortable: with the Speak Up! Service, you can raise your concerns anonymously¹. However, we encourage you to put your name to any disclosures you make, as it may be difficult or impossible to make a proper investigation without obtaining further information from you.

When you Speak Up, you should provide as much detail as possible about the nature of your concern. Don't worry if you don't have all the facts and do not attempt to investigate the matter yourself: we encourage you to let us know your reason for concern and allow us to take the appropriate action.

As a matter of principle, your identity and the details of your concern will be kept confidential and shared only as necessary to deal with the concern. Any personal data collected as part of this Policy will be processed in accordance with relevant legislation.

You have raised a Speak Up, so what's next?

Once your concern has been raised, the details of your concern will be logged in our Speak Up! case management system. Your concern will then be promptly assessed by the Ethics & Compliance Team and, if it falls under the scope of this Policy, it will be investigated in a fair and unbiased manner. We aim to conclude all investigations in a timely manner, with the timescales dependent on the complexity of the investigation. We encourage you to cooperate if you become involved in an investigation. If you participate in or come to learn of an investigation, you must keep it confidential.

If you raise a concern, and we are able to contact you, you will be informed when the case has concluded.² If your concern is substantiated, appropriate measures (including disciplinary action, if warranted) will be taken in accordance with local law and policies.

You will be protected for speaking up in good faith

We value the help of those who report concerns in good faith. Retaliation (both direct or indirect) for speaking up or cooperating in the investigation of a Speak Up! report, is not tolerated and will lead to disciplinary action. This protection does not extend to reports made with ill intent, for personal benefit or with malice. If you are concerned that you are being retaliated against, report this as per the 'How to Speak Up in good faith?' section above.

¹ Where local laws allow.

² To preserve confidentiality, observe legal requirements and protect the privacy of all concerned we will not share detailed findings.

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 the [Ethics & Compliance Team](#).

Revision & Approval History

Revisions

Issued / Revised	Version	Effective Date	Summary of Key Changes
Issued	1	June 2020	Removed 3rd Party Provider links and number
Revised	2	May 2023	Policy made more succinct. Clear distinction between the Speak Up vs. Grievance process.

Approval History

Role	Name	Title	Date of Approval
Author	Martina Algeri	Ethics & Compliance Director	N/A
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