

CORPORATE POLICY

Sanctions Policy

Valid from:	<16/04/2026>
Next review:	<16/04/2029>
Policy Owner:	<Ethics and Compliance>

Purpose and Scope

Purpose

Economic sanctions (sometimes referred to as embargoes) are government restrictions applicable to dealings with certain countries/ territories, governments, groups, entities, individuals, or controlled goods or services. The nature and extent of these restrictions may vary; typically, they include limitations and/or prohibitions on import/export; prohibitions or restrictions on specific goods and services; prohibitions or restrictions on financial operations; and/or bans on transacting with sanctioned Third Parties (including banks) or with entities owned by sanctioned parties.

This Policy outlines our responsibility to comply with sanctions laws globally. Violations of sanctions laws can result in civil fines, criminal fines, criminal prosecutions, but also reputational damage of the company and our brand.

Scope

This Policy is applicable to all Reckitt employees, contractors, and sub-contractors globally – anyone who works for Reckitt Group (i.e. a company from the Group, or a company which subsequently joined the Group, or a legal entity under the Group).

To the extent there is a local law, policy or Standard Operating Procedure (SOP) that is stricter than the provisions of this policy, such local law, policy or SOP shall prevail.

Policy Statement

You must comply with all applicable sanctions laws and must not engage in any business that could violate them. Sanctions may affect:

- Where we do business: we must not do business in restricted countries or territories that would violate sanctions.
- How we do business: we do not circumvent, evade, or facilitate the violation of sanctions, including the way accept payment for transactions.
- Who we do business with we must not do business with Third Parties and individuals on an applicable sanctions list.

You should also be mindful that sanctions requirements apply not only to companies, but also to individuals. For example, UK, EU and US nationals are subject to UK, EU and US sanctions, respectively, regardless of where they are located, in addition to those applicable to Reckitt; as such, they must exercise particular care and seek legal advice before working with sanctioned countries, territories, or parties. Similarly, non-UK, non-EU and non-US nationals who are residents of UK, EU and US are subject to relevant UK, EU and US sanctions.

In certain cases, there may also be countermeasures (or countersanctions) which may bar individuals and companies located in certain jurisdictions from complying with foreign sanctions that the local government does not support. Again, it is important to escalate issues and questions to the legal department to ensure that any conflicts of laws are resolved appropriately.

Compliance Controls

Reckitt implements risk-based controls to detect, prevent and address potential sanctions violations.

- **Screening:** Relevant parties, including but not limited to, distributors, suppliers, and financial institutions, must be screened against all applicable UK, EU and US sanctions lists, as well as sanctions lists applicable to the Reckitt contracting entity at onboarding and on an ongoing basis.
- **Third Party Due Diligence:** Due to Reckitt's reliance on distributors and indirect sales channels in some territories, appropriate due diligence must be conducted on Third Parties, including assessment of ownership, geographic exposure, and potential diversion risks. Enhanced due diligence may also be required. This includes understanding the jurisdictions in which distributors operate, their downstream distribution channels, and any potential exposure to sanctioned jurisdictions.
- **Restricted Jurisdictions:** Transactions involving prohibited jurisdictions are not permitted. Transactions involving higher-risk jurisdictions must be escalated and approved by the Chief Ethics and Compliance Officer prior to proceeding. Please see the [Appendices](#) for these prohibited and higher risk jurisdictions.
- **Transaction Review and Escalation:** Any activity that may involve heightened sanctions risk must be escalated to Legal or Ethics & Compliance. No such activity may proceed without prior approval. Depending on the level of risk, escalation may require review and approval at the regional or global level.
- **Contractual Safeguards:** Where appropriate, agreements with Third Parties must include sanctions compliance provisions, including restrictions on prohibited activities and rights to suspend or terminate in the event of a sanctions concern.
- **Payment Controls:** Payment transactions must always comply with applicable sanctions restrictions. Where funds or transactions may be subject to sanctions, they must be escalated and handled in accordance with Legal guidance and applicable law.

Roles and Responsibilities

Reckitt maintains a centralized sanctions compliance framework overseen by Legal and Ethics & Compliance.

- **Legal / Ethics & Compliance:** responsible for interpretation of applicable sanctions laws, determining permissibility of transactions, providing approvals, managing escalations, and engaging with regulators.
- **Business Functions / Business Owners:** responsible for identifying sanctions risks in their activities, complying with this Policy, ensuring appropriate due diligence on Third Parties, and escalating any potential sanctions concerns prior to proceeding.
- **Finance:** responsible for applying appropriate controls to payment flows and financial institutions involved in Reckitt transactions, including ensuring that relevant banks and payment counterparties undergo appropriate due diligence and screening. Where funds or transactions may be subject to sanctions restrictions, the matter must be escalated immediately to Legal and the Global Treasury team for review, and no funds may be released, returned, or otherwise dealt with except in accordance with applicable law and internal approval requirements.
- **All Personnel:** responsible for complying with this Policy and promptly reporting any sanctions concerns or potential violations.

Testing, Auditing, and Self-Assessments

Reckitt maintains ongoing oversight of its sanctions compliance framework to ensure it remains effective and aligned with regulatory expectations. This includes periodic reviews, testing, and independent assessments of key controls, as well as timely remediation of any identified gaps. Material issues are escalated to senior management as appropriate.

Recordkeeping and Training

Reckitt maintains records in line with corporate retention policies and applicable laws. For sanctions-related activities, sufficient documentation must be kept to demonstrate compliance, noting that some jurisdictions require specific retention periods (e.g., U.S. – 10 years; U.K. – 6 years). Reckitt also provides risk-based compliance training to relevant personnel in accordance with the Framework for Reckitt Policies.

Reporting Policy Breaches

If you know or suspect that a breach of this Policy has occurred, please report your concerns to your Line Manager, Ethics and Compliance team or via [Speak Up](#) as soon as possible.

Any government inquiry, subpoena, or regulator contact relating to sanctions must be immediately referred to Legal. No Reckitt information should be provided to governmental authorities without prior Legal review. Potential violations may be disclosed to authorities where appropriate, as determined by Legal.

Discipline for Non-Compliance

Regulators typically take a zero-tolerance approach to breaches of Sanctions, even if you were not aware that you were breaching them. The penalties for violating these laws can be severe, both for the company and for the individuals involved. Reckitt may

take disciplinary action up to and including termination for failure to comply with this Policy.

Contact Information

If you are ever in any doubt about the right course of action, or if you have questions about this Policy, please consult a member of the [Ethics & Compliance Team](#).

Appendices

Appendix 1: List of Sanctioned Countries and Territories

[List of Sanctioned Countries and Territories](#)

Appendix 2: Red flags

[List of Sanctions Red Flags](#)

Revision & Approval History

Revisions

Issued / Revised	Version	Effective Date	Summary of Key Changes
Issued	1	July 2018	Version 1
Revised	2	May 2023	Included detailed description of Reckitt's controls for Sanctions' compliance.
Revised	3	April 2026	Updated to include red flag indicators, sanctioned country chart, escalation and government inquiries, as well as management commitment and risk assessment.

Approval History

Role	Name	Title	Date of Approval
Author	Ariadna Grañena	Ethics & Compliance Director	N/A
Owner	Geoffroy Ribadeau Dumas	Chief Ethics and Compliance Officer & SVP Legal	N/A
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Approver	Cathy O'Rourke	Group Company Secretary	16.04
Approver	Ranjay Radhakrishnan	Chief HR Officer	16.04
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