

**HAL=ON**

# **Human rights Our Policy**



## **Our purpose and commitment**

Our purpose at Haleon is to deliver better everyday health with humanity. This means we will always strive to do the right thing and take responsibility to respect and promote human rights wherever we do business.

As a multinational organisation with global reach, we are committed to becoming a role model in respecting, protecting, and promoting human rights across our value chain.

Human rights are the basic rights and freedoms that belong to everyone, regardless of who they are or where they live.

We are committed to respecting all internationally recognised human rights standards, such as the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-Operation and Development's (OECD) Guidelines for Multinational Enterprises which include ensuring we have policies and processes to prevent, mitigate and remediate potential and actual adverse human rights impacts.

We are also committed to upholding the International Bill of Rights and the core labour standards set out by the International Labour Organisation (ILO), including the ILO's Declaration on the Fundamental Principles and Rights at Work. Haleon is a signatory to the UN Global Compact and is committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company. We support the principles of transparency in relation to human rights impacts as set out in various human rights related legislation.

Haleon takes a partnership approach, working with others who have the mandate, competence, and capacity to facilitate change and ensure respect for human rights. We are guided by our own values to use our influence appropriately, and we will seek to work with others to effect change where possible.

**As an employer Haleon is:**

- Committed to providing a fair salary and decent working<sup>1</sup> conditions;
- Committed to equal pay for equal work;
- Committed to providing a healthy, safe, and secure workplace for all employees and contractors;
- Committed to exercising high standards of integrity in dealing with and protecting the Personally Identifiable Information (PII) of employees;
- Opposed to discrimination at work and committed to promoting diversity, equity, and inclusion;
- Committed to promoting the personal development and dignity of every individual employee;
- Respectful of the right of employees to join an independent trade union, the right to collectively bargain, and of freedom of association; and
- Opposed to all forms of slavery, forced labour and child labour. We will work with appropriate partners to remediate these problems responsibly wherever we encounter them.

**Scope and definitions**

This policy applies to all Haleon companies and all its Employees. It also applies (where relevant) to all Suppliers, Subcontractors, Supplier Vendors, and other Business Partners. We expect all such parties to adhere to the principles outlined in this policy.

In this Policy the following definitions apply:

- **Haleon** means the Haleon group of companies or any one of its members (as applicable).
- **Supplier** means a company, partnership or individual that provides goods or services to Haleon.
- **Subcontractor** means the Supplier's agents and subcontractors engaged by the Supplier to carry out its obligations to Haleon.
- **Supplier Vendors** means any of the Supplier's suppliers and vendors which are directly relevant to the goods or services being supplied by the Supplier to Haleon and are therefore part of Haleon's extended supply chain.

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<sup>1</sup> Decent work is defined by the International Labour Organization (ILO) as "productive work for women and men in conditions of freedom, equity, security and human dignity"

- **Business Partners** means all Suppliers and Subcontractors, as well as joint venture partners, collaborators and any other third parties with which Haleon does business.
- **Worker** means any individual whom a Supplier employs, hires or engages, or otherwise uses to conduct its business with Haleon.
- **Employee** means a Haleon employee.

### Doing business with respect for human rights

As a global corporate citizen, we respect the law and behave with honesty and integrity in all aspects of public life and demonstrate responsible leadership. As a member of local communities, we respect and promote the rights of all those within our sphere of influence in those communities.

As a purchaser of raw materials, manufactured goods, and services around the world, we strive to only conduct business with Business Partners who share our commitment to high ethical standards and operate in a responsible and ethical manner towards their workers – both directly and indirectly employed - and their own suppliers.

### Understanding human rights

Here we provide more detail on the human rights that must be respected by Haleon and all Business Partners. These standards represent a minimum and do not preclude Haleon or Business Partners from adopting higher standards.

#### No use of child labour

Child labour must not be used, including but not limited to any of the worst form of child labour. Child labour is defined by the ILO as; 'work that deprives a child of their childhood, their potential and their dignity, and that is harmful to their physical or mental development including by interfering with their education.' The worst forms of child labour are defined in Article 3 of the ILO Worst Forms of Child Labour Convention, 1999 (No. 182).

Haleon and its Business Partners must ensure, and Haleon expects Supplier Vendors to ensure, that they do not employ individuals younger than 15 years of age<sup>2</sup> in line with the ILO Minimum Age Convention No 138 or below the country's legal minimum

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<sup>2</sup> Or 14 years of age in those countries for which an exception is provided in ILO Convention No 138

age for employment or the age established for completing compulsory education. Robust age verification checks should be in place to ensure this expectation is met.

Any young worker (those under 18 but above the legal working age) must be protected from the worst forms of child labour, including forced labour and hazardous work. Their work must not be mentally, physically, socially, or morally harmful, nor should it interfere with their education, in line with ILO Convention 182. Young people must be afforded extra protection and must not be employed in hazardous work, which according to the [ILO Recommendation 190](#) includes (but is not limited to) working at night, working long hours or being exposed to chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise. Haleon and its Business Partners must, and Haleon expects Supplier Vendors to, carry out appropriate risk assessments and conduct regular monitoring of young workers' health and working conditions.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with this section.

### **Respecting children's rights**

Haleon and its Business Partners must, and Haleon expects Supplier Vendors to, uphold and promote children's rights across all areas of operations, with a focus on maximising positive impacts on children and minimising potential harm. In alignment with the Children's Rights and Business Principles, Haleon and its Business Partners are responsible for fostering a safe, supportive environment where children's rights are consistently respected and safeguarded.

### **Employment is freely chosen**

All work must be conducted on a voluntary basis, not under threat of any kind. There must be no use of modern slavery, including forced labour, bonded labour, indentured labour, or involuntary prison labour. Employees and Workers should not pay for a job or pay any monetary deposits on starting work. Employees and Workers must not be required to lodge original identification papers or have their freedom of movement denied. Employees and Workers must be able to leave their employer after reasonable notice, the period of which should be agreed upon engagement, and should receive all owed salary.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with the requirements in this section.

## **A safe and healthy workplace is provided**

All Employees and Workers must be provided with clean and safe conditions in all work and residential facilities. Employees and Workers must have access to clean toilet facilities, potable water, and if applicable, hygienic food storage. Adequate steps to prevent accidents and injury arising out of, associated with, or occurring during work, must be taken by minimising the causes of occupational hazards. In the event of an occupational accident or incident, emergency healthcare must be provided.

Health and safety information and training must be provided to Employees and Workers, so they are able to understand the hazards, risks and control measures associated with their job. At least one senior management representative should be assigned responsibility for health and safety and a risk-based management system should be implemented with clearly defined accountabilities for maintaining it.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with the requirements in this section.

*Further information on Haleon's commitment to health and safety can be found in our [Environment, Health, Safety and Wellbeing Policy](#).*

Haleon's internal Global Security Policy confirms our commitment to protecting our people, property, assets, brands, and reputation in accordance with the Company's [Code of Conduct](#) and all relevant human rights legislation.

## **No discrimination is practised**

All Employees and Workers must be treated with respect and dignity. The employment relationship must be based on the principle of equal opportunity and fair treatment. This means that Employees and Workers must not be discriminated against based on race, colour, religion, ethnicity, disability, gender, age, sexual orientation or gender identity, political affiliation, union membership or marital and/or pregnancy status in any hiring or employment practices. The rights of minority and vulnerable groups must be protected, including the rights of women.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with the requirements in this section.

## **No cruel or abusive treatment**

All workplaces must be free of harsh and inhumane treatment, including any corporal punishment, mental, physical, sexual, or verbal abuse and no threat of any such treatment or other forms of intimidation.

Written disciplinary procedures should be established and explained to Employees and Workers in terms that are clear and understandable to them. Disciplinary and/or performance management actions should be recorded and explained to workers. Employees and Workers must have the right to trade union or other appropriate representation at any disciplinary action which may lead to significant disciplinary penalties or dismissal.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with the requirements in this section.

## **Fair wages and benefits**

Haleon and all Business Partners must, and Haleon expects Supplier Vendors to, pay at least the relevant legal minimum wage, or a fair representation of the prevailing industry wage, and provide all legally mandated benefits and paid leave. Wages should always be enough to meet basic needs and to provide some discretionary income.

A transparent process must be established to ensure that Employees and Workers are compensated in a timely manner and fully understand the wages that they receive.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with the requirements in this section.

## **Working hours are not excessive**

Haleon and Business Partners must, and Haleon expects Supplier Vendors to, ensure that working hours comply with national laws and collective agreements. Standard weekly working hours, excluding overtime, must be defined by contract and should not exceed 48 hours per week and eight hours a day, to ensure a safe and healthy working environment and adequate rest time between shifts. The total hours worked, including overtime, in any week, should not regularly exceed 60 hours in a single week with a minimum of one day rest per week.

Working hours may only exceed 60 hours in a single week if any of the following conditions are met: this is allowed by national law; this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; appropriate safeguards are taken to protect the Employees' or Workers' health and safety; and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.

All overtime undertaken over and above the standard working day/week, as agreed upon engagement, must be voluntary. Employees and Workers should receive clear communication about whether overtime is required and the wages to be paid for such overtime. Any paid overtime undertaken by Employees or Workers should be compensated at a rate no less than one and one-quarter times the regular rate.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with the requirements in this section.

### **Freedom of association**

We are committed to providing a collaborative work environment with direct communication between management, employees, and where Employees have chosen to organise within an appropriate framework, their representatives.

At Haleon, we respect the legal rights of all employees to establish and join labour organisations and trade unions for the promotion and defence of their interests and have zero tolerance to any subsequent discrimination, harassment or relation detrimental treatment towards employees or their representatives as a consequence of employees exercising such rights or performing their role as a representative.

The right to negotiate collectively is equally respected. In countries where the right to collective bargaining is restricted by law, or where employees have not elected or appointed representatives, or where the Haleon legal entity has lawfully decided not to recognize a labour organization, we will seek alternative means to ensure open communication and dialogue between employees and management.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with this section.



## **Community and land rights**

Communities can be impacted by business operations in several ways, for example, through environmental pollution impacting their right to clean water or health. Communities, including Indigenous Peoples, can also be impacted by land acquisition or use. Haleon and its Business Partners must not, and Haleon expects Supplier Vendors not to, exploit resources to the disadvantage of local communities. The land rights of local and Indigenous communities must be upheld and the process of Free Prior and Informed Consent must be respected.

## **Patient safety**

As a consumer health company, we believe that the rights, dignity, and safety of people using our products, both during and after their development, are paramount. We monitor rigorously the safety of our products to protect consumers' well-being, and that of people involved in the R&D and manufacturing of products. We are committed to ensuring that the rights of people taking part in our clinical research are protected, including through the informed consent process and procedures to protect patient privacy.

All Business Partners must, and Haleon expects Supplier Vendors to, comply with this section.

*For more information, please see our [policy position on product and ingredient safety](#), our [approach to clinical trials Policy Position](#) and our [Policy on Product Quality & Safety](#).*

## **Respecting human rights across our value chain**

Haleon is committed to respecting human rights wherever we do business, and we expect our Business Partners to adhere to the same international standards, including the UN Guiding Principles, and respect human rights wherever they operate in the world.

## **Working with Third Parties**

Our [Supplier Code of Conduct](#) establishes the minimum standards that must be met by any entity that supplies products or services to the Haleon group of companies. It

includes our minimum standards on Child Labour; Modern Slavery, Human Trafficking and Forced Labour; Wages and Remuneration; Freedom of Association and Collective Bargaining; Fair Treatment and No Discrimination; and Working Hours, amongst others, and we include a requirement to comply with the Supplier Code in our Supplier contracts.

As part of our commitment to diversity and inclusion, we support Supplier businesses run by groups that are under-represented in the supply chain such as those owned by women, or minorities. Through our supplier diversity programmes, we also engage with and mentor small and diverse businesses and help them identify potential areas for growth.

## **Our Due Diligence approach**

We are committed to identifying, preventing, mitigating, and remediating our human rights impacts in line with international best practice, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. This means undertaking a risk-based due diligence approach across our value chain.

### **Risk Identification and Assessment**

We undertake an annual human rights risk assessment, in-depth human rights impact assessments and routine on-site audits against recognised standards. Our Third-Party Risk Management (TPRM) process proactively assesses risks across our supply chain. Where our due diligence processes identify higher risk activities, we work with our Business Partners to manage and mitigate these risks. We expect our Business Partners to accept any recommended actions to prevent, mitigate, and remediate adverse impacts.

We work closely with a range of subject matter experts, civil society organisations and NGOs, industry bodies, and consult with stakeholders to understand the impact of our business activities. Through membership of industry associations, we support collective action engagement across our industry.

### **Remediation**

When our due diligence processes identify that we have caused or contributed to potential or actual adverse human rights impacts, we will take a human rights-

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centred approach to cease, prevent, and mitigate these impacts, provide remediation to those affected, and evaluate the effectiveness of our actions.

We require our Business Partners to support and work with us to cease, prevent, mitigate, and remediate any human rights impacts which are identified in our value chain. However, in certain circumstances it may be necessary to end a relationship with a Business Partner if they are unable to meet the standards we expect of them. We recognise that this action in itself may cause adverse impacts on workers and individuals. We are committed to supporting Business Partners to improve their human rights management practices and would only consider terminating the contract as a last resort.

### **Training and Capacity Building**

We are committed to building knowledge and capacity across the business to respect human rights and expect our Business Partners to do the same. All Employees have access to online human rights training, and bespoke human rights training is provided to selected teams as appropriate. All Employees are provided with mandatory training on our Code of Conduct which includes information on human rights and how to report concerns.

We are committed to working with our Business Partners to drive continuous improvement. We collaborate with a range of third parties to support capacity building across our supply chain.

### **Grievance Mechanism**

Our grievance mechanism is called '[Speak Up](#)' and it is available to all Haleon Employees, and all Workers, as well as anyone outside of our business who has a concern or sees something, relating to Haleon's business, that is not in line with our policies, our standards, or the law. We expect Suppliers to also provide a grievance mechanism for Workers to raise occupational concerns.

Concerns can be reported as part of Speak Up through the following channels: telephone, web portal, e-mail, or mail. These channels are managed independently of Haleon and are available globally in multiple languages.

Any concern received through Speak Up is investigated in line with our principles of humanity, confidentiality, proportionality and safeguarding. Any concern is looked at in detail by the Investigations, Legal and HR teams and, if appropriate, a formal

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investigation may take place. Once the facts have been established, the concern is addressed in an appropriate way. Appropriate feedback is provided to the complainant in a timely manner.

All reports via Speak-Up are treated in strict confidence. Where individuals wish to remain anonymous, Haleon will respect this, but we do encourage individuals to identify themselves when reporting to help us address their concerns effectively. Where requested, Haleon will take all appropriate measures to protect the identity of individuals who report and to safeguard them from retaliation.

Haleon will investigate any concerns raised with it and Business Partners must cooperate in any investigations, including providing access to required information to personnel needing to be interviewed, and to premises when an onsite audit may be required. Once the investigation is concluded, Haleon will discuss the findings with the Business Partner and agree on next steps and remedial actions.

*More information can be found about Speak Up [here](#).*

## Reporting

We routinely report on our human rights performance through our corporate website and annual reports. We also publish an annual Human Rights Statement detailing our approach to managing human rights impacts and risks, which includes areas such as modern slavery, decent work, forced labour, and child labour.

**Revision History**

<b>Revision</b> (Principal changes from last revision)	
<b>Type of Change:</b>	<input type="checkbox"/> New <input type="checkbox"/> Administrative changes; <input checked="" type="checkbox"/> Technical changes impacting: Due Diligence <input checked="" type="checkbox"/> Roles and responsibilities <input checked="" type="checkbox"/> Process or activities
<b>Reason for Change</b>	To meet new requirements set out in human rights related legislation
<b>Description of Change</b>	<ul style="list-style-type: none"> <li>• Strengthened language on human rights that required to be respected</li> <li>• Strengthened our commitments on human rights and due diligence to meet legal requirements</li> </ul>

**Approvals**

<b>Owner</b>	Chief Corporate Affairs Officer
<b>Author</b>	Social Impact Director
<b>Legal</b>	Assistant General Counsel, Sustainability & ESG
<b>Date</b>	20/11/24
<b>Next review</b>	November 2025