

**HALEON**

# Supplier Code of Conduct



## ABOUT THIS CODE

Our purpose at Haleon is to deliver better everyday health with humanity. Haleon is committed to operating to high environmental, social and ethical standards to ensure we maximise the long-term sustainability of our business, business partners and relationships and of the communities which we source from and operate in.

This commitment is reflected in our Supplier Code of Conduct (**Code**), which establishes the minimum standards that must be met by any entity that supplies products or services to the Haleon group of companies.

This Code is informed by the International Bill of Human Rights, the principles set forth in the International Labour Organisations (ILO) 1998 Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD guidelines for Multinational Enterprises on Responsible Business Conduct and the Pharmaceutical Supply Chain Initiative (PSCI) principles.

In this Code:

- **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.
- **Worker** means any individual whom the Supplier employs, hires or engages, or otherwise uses to conduct its business.
- **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.

Each Supplier must comply with the Code and must ensure that its Workers and Subcontractors are aware of this Code (including the Speak-Up service referred to below) and comply with provisions which are relevant to them. The Code will be incorporated into our supply agreements and each provision of this Code will be considered to be a material term of any agreement with a Supplier.

Each Supplier must make its Supplier Vendors aware of this Code and use reasonable endeavours to include equivalent provisions in contracts with those Supplier Vendors.

If there is a conflict between any requirements of applicable laws or regulations, the provisions of an agreement between Haleon and the Supplier, and the provisions of this Code, the Supplier must meet the highest of those standards.

Haleon has the right to modify this Code from time to time and the Supplier must comply with the latest version of the Code.

## OUR MINIMUM STANDARDS

### Child Labour

- Child labour must not be used. Individuals must not be hired who are under the higher of: (i) the relevant legal age of work, (ii) the upper age for compulsory schooling, and (iii) 15 years of age.
- Individuals under 18 years of age must not be hired for positions that include hazardous work or that interfere with the individual's education.
- Where applicable, child protection measures must be in place to ensure that children suffer no harm, exploitation, or abuse because of the activities of the Supplier.

### Modern Slavery, Human Trafficking and Forced Labour

- Suppliers must comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force.
- All work must be conducted on a voluntary basis, not under threat of any kind.
- All forms of forced labour, bonded labour, indentured labour, trafficked labour, or involuntary prison labour are prohibited.
- Workers must not be charged or required to pay fees or deposits to obtain or maintain employment.
- Workers' original personal identification and travel documents must not be retained, and their freedom of movement must not be restricted. Workers must be able to leave their employer after reasonable notice (the period of which must be agreed upon engagement) and must receive all owed salary.
- All Workers must have their terms of employment provided in writing to them with accurate and understandable information regarding the nature of the work, compensation, working hours and benefits.

### Wages and Remuneration

- All Suppliers must compensate all Workers with all legally mandated wages, including overtime premiums and benefits.
- Payments to Workers must be made on time and on at least a monthly basis.
- Deductions must not be taken from pay as punishment and must not take the Worker's wages below the legal minimum wage.
- Itemised records must be maintained by the Supplier and transparent pay information must be provided to Workers in a timely manner with payslips provided.
- Pregnancy, maternity, and lactation benefits, including relevant protections, leave, and accommodations, must be provided in accordance with the law.

### Freedom of Association and Collective Bargaining

- Suppliers must respect, and must not interfere with, the right of Workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.
- Where Workers are represented by a legally recognised union, Suppliers must commit to establishing a constructive dialogue with the union's freely chosen representatives and bargaining in good faith with such representatives.

### Fair Treatment and No Discrimination

- Suppliers must not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy

status, disability, union membership or political affiliation or any other characteristic other than the Worker's ability to perform the job subject to any accommodations required or permitted by law.

- Suppliers must prohibit all forms of abuse or harassment in the workplace.

### Health and Safety

- Suppliers must provide a safe, clean, healthy, and sanitary working environment and comply with all relevant health and safety laws.
- Suppliers must implement general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries.
- Suppliers must provide relevant Workers with appropriate health and safety training, ensure hazardous materials and chemicals are properly stored, and Workers provided with appropriate personal protective equipment (PPE).
- Suppliers must ensure health and hygiene of Workers is provided for as relevant at its sites, including toilet facilities, access to drinking water and food safety.
- Suppliers must ensure unreasonable restrictions are not placed on Workers' toilet, rest, lactation and prayer breaks.
- Where Suppliers provide accommodation, transportation and/or food for Workers it must be sanitary and safe.

### Working Hours

- Suppliers must ensure that working hours comply with national laws and collective agreements. Standard weekly working hours, excluding overtime, must be defined by contract and must ensure a safe and healthy working environment and adequate rest time between shifts.
- All overtime undertaken over and above the standard working day/week must be voluntary. Workers must receive clear communication about whether

overtime is required and the wages to be paid for such overtime. Any overtime undertaken by Workers must be compensated.

### Conflict Minerals

"*Conflict Minerals*" are tin, tantalum, tungsten and gold. Haleon is committed to only using Conflict Minerals which are "*conflict-free*", i.e. Conflict Minerals that were extracted and did not directly or indirectly benefit armed groups in the Covered Countries. The "*Covered Countries*" are Democratic Republic of the Congo, Zambia, Angola, Republic of the Congo (Brazzaville), Central African Republic, South Sudan, Uganda, Rwanda, Burundi and Tanzania.

- All Suppliers must ensure that all Conflict Minerals supplied to Haleon, or contained in materials or products supplied to Haleon, are conflict-free.

### Ethical Business Practices

- Suppliers must comply with all applicable laws, statutes, codes, and regulations including those relating to the prevention of bribery, corruption and money laundering, and have adequate systems in place to prevent the same.
- Suppliers must not accept, offer, promise, pay, permit, or authorise:
  - bribes, facilitation payments, kickbacks or illegal political contributions
  - money, goods, services, entertainment, employment, contracts, or other things of value, in order to obtain or retain improper advantage or
  - any other unlawful or improper payments or benefits.
- Suppliers must employ fair business practices and comply with all applicable competition laws, including but not limited to those relating to teaming and information sharing with competitors, price fixing and rigging bids.
- Suppliers must mitigate appropriately against any real or perceived conflicts of interest through their work with Haleon and notify Haleon if they

become aware of any such conflict of interests.

### **Data Privacy and Information Security**

- Suppliers must comply with all data protection laws and requirements when processing any personal data (as defined by applicable data protection laws) .
- Suppliers must have in place appropriate technical and organisational measures to
  - protect the integrity and confidentiality of information belonging to or supplied by Haleon and
  - ensure that there is no unauthorised access, disclosure, destruction, loss or alteration of the information by third parties, including its Subcontractors.

### **Environmental Responsibility**

- Suppliers must ensure that:
  - its operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) climate change, waste disposal, emissions, discharges and the handling of hazardous and toxic materials,
  - the goods it manufactures (including the inputs and components that it incorporates into its goods) comply with all

applicable environmental laws and treaties and

- it will only use packaging materials that comply with all applicable environmental laws and treaties.
- Suppliers must ensure they have all required permits for the use and disposal of waste and water and any waste, wastewater or emissions with the potential to adversely impact human or environmental health must be appropriately managed, controlled and treated prior to release into the environment.
- Suppliers must provide Haleon with materials from legal sources and in compliance with national and international laws relating to the importation of deforestation-free commodities.

### **Subcontractors**

- Suppliers must carry out appropriate due diligence on prospective Subcontractors that will be carrying out its obligations to Haleon, including on areas covered by this Code.
- Suppliers must ensure that Subcontractors are aware of and comply with provisions of this Code which are relevant to the goods or services being supplied by the Subcontractor.
- Suppliers must monitor that Subcontractors are complying with relevant provisions of this Code.

**COMPLIANCE**

**Controls**

Haleon takes instances of non-compliance with the Code seriously. We expect Suppliers to have processes and controls in place to comply with the Code. Where appropriate Haleon will perform risk-based due diligence on Suppliers as part of actively monitoring its relationships and ongoing supplier engagement. Haleon reserves the right to ensure implementation of and compliance with the Code through periodic reviews.

**Reporting**

Any known or suspected failure to comply with the Code must be reported to Haleon promptly. Suppliers, Workers, Supplier Vendors and Subcontractors can make a report either directly to any Haleon manager or supervisor or online through Haleon’s dedicated online reporting tool, *Speak-Up*.

*Speak-Up* enables anyone to voice their concerns and report non-compliance with the Code or any applicable laws or regulations. The *Speak-Up* service can be found at <https://haleon.caseiq.app/portal>, and can also be reached by telephone via the international toll-free lines available at: <https://haleon.caseiq.app/portal/dialing-instructions>.

All reports via *Speak-Up* are treated in strict confidentiality. 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 expects Suppliers to co-operate in any investigations, including providing access to required information and to personnel needing to be interviewed. Once the investigation is concluded, Haleon will discuss the findings with the Supplier and agree on next steps and remedial actions.

<b>Approvals</b>	
<b>Owner</b>	Chief Procurement Officer
<b>Author</b>	Director of Human Rights & ESG Reporting
<b>Legal</b>	Assistant General Counsel, Sustainability & ESG
<b>Date</b>	21 September 2023 (Links updated January 2025)