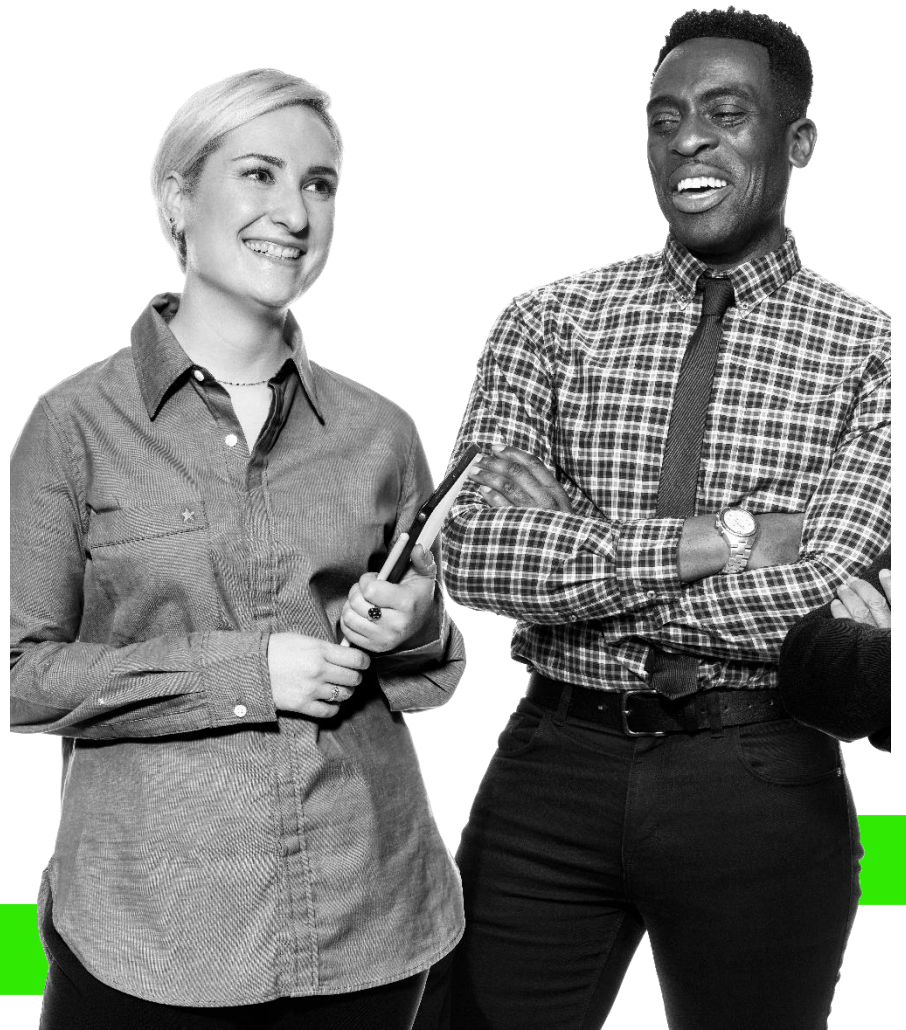


HAL**ON**

Conflicts of Interest

Our Policy



1. Why it matters

- A conflict of interest (“conflict”) 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.

2. Purpose of the policy

- In line with our Code of Conduct, decisions made at work must be in the best interest of Haleon and not influenced by personal relationships or other benefits. This policy describes how to identify and manage conflicts properly.

3. Who the policy is for?

- This policy applies to all employees, management, officers, directors, and contract workers of all entities in the Haleon Group. It also applies to consultants, contractors, and agents working for Haleon. Other third parties must comply with the Supplier Code of Conduct.
- If you are a director of a Haleon company, local law may impose additional requirements on you for managing conflicts. Your local Legal or Corporate Secretariat team will advise you on these requirements.

4. What are examples of conflicts?

- Conflicts of interest may affect the decisions you make at work, examples include:
 - **Personal Relationships:** you manage a partner or spouse at Haleon, and make decisions about their pay, bonus or promotion.
 - **Connections to Government Officials:** you have a close personal relationship with someone in a government agency that grants permits, licenses or approvals to Haleon.
 - **Connections with a Third Party:** you have a significant interest (e.g. large shareholding, directorship or senior role) in one of Haleon’s suppliers, and this influences how you deal with them.
 - **Outside Work Activities:** you hold a paid or unpaid position as an external consultant and advise on Haleon’s commercial strategy.
 - **Other Conflicts of Interest:** you are offered a gift or hospitality from a participant, during a tender.
 - **Intellectual Property Rights:** you hold patents, copyrights, or trademarks, or domain names used for products that compete with Haleon.
 - **Board Memberships:** you are a member of a Board of Directors, Scientific Advisory Board, or Nonprofit Board, and the board includes individuals from Haleon competitors.
- Conflicts related to Intellectual Property Rights and Board Memberships pose extra risks and must be checked by your legal business partner. You may also need to notify regulatory authorities.

5. I have a conflict of interest, what should I do?

- If you have a conflict, you must disclose it, by following these three steps:
 - **Discuss:** If you think you may have a conflict, please talk to your line manager or supervisor.
 - **Agree:** You and your manager must agree on the steps you will take, to mitigate the impact of the conflict, on Haleon.
 - **Disclose:** You complete the online conflict of interest disclosure form [here](#). Once approved, download and submit the completed form on Workday.
- You must complete a disclosure form if you have a new conflict, or if something changes with an existing conflict, even if it was previously disclosed.
- If you have a conflict, you must take steps to avoid the conflict from affecting the decisions you make, and note these steps on the disclosure form. Examples of how to manage a conflict include:
 - Changing reporting lines, if you would manage a partner or spouse.
 - Not being involved in applications for permits, licences or approvals, where you have a close relationship with someone at the relevant government agency.
 - Reassigning roles or projects, where you have a significant interest (e.g. large shareholding, directorship) in the third party concerned.
 - Stepping down from a role as a consultant, where this would require you to disclose confidential information about Haleon.
 - Not accepting a gift or hospitality offered by a tender participant, if you are the decision maker or if there is a negotiation in progress.
 - Transfer the intellectual property rights you hold in a competing product, to someone else.
 - Declining a board membership, where the board includes representatives from Haleon competitors.
- If you are unsure whether you have a conflict, please speak to your colleague in Legal or Ethics and Compliance.

6. Roles and Responsibilities

- **All:** Responsible for disclosing any conflict and ensuring that it does not impact Haleon or affect their decisions at work.
- **Manager:** Responsible for agreeing on mitigation actions for conflicts disclosed by team members and for overseeing their completion.
- **Recruiters and Hiring Managers:** Responsible for assessing any conflict disclosed during the candidate screening, interview, and assessment process.
- **Legal, Ethics & Compliance, or HR:** Responsible for conducting checks to ensure the conflict of interest policy and process are working effectively, while maintaining privacy and confidentiality. Please refer to the Haleon Worker Privacy Notice for more information.

7. Consequence Management

- Having a conflict is not necessarily a violation. However, failing to disclose or properly manage a conflict may breach this policy and the Code of Conduct, resulting in disciplinary action, including termination of employment. A breach may also be illegal and result in enforcement action against you and/or Haleon.

8. Raising your concerns

- If you suspect a breach of this policy, report your concerns to your line manager, local management team, Ethics & Compliance, HR, or Legal. You can also use the independently managed [Speak Up](#), available in multiple languages. Haleon does not tolerate retaliation against anyone who reports concerns in good faith.

9. Review

- This policy will be regularly reviewed and updated as necessary to incorporate lessons learned and regulatory changes.