



HOW EIGHT PILLARS HELP RECKITT BENCKISER DO THE RIGHT THING, EVEN WHEN IT IS THE PATH LESS CHOSEN

What makes Reckitt Benckiser distinctive is that the functionality of many of our brands authentically serve a large social cause – be it in hygiene, health or nutrition

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At Reckitt Benckiser we follow very rigid regulatory standards that fuel the importance of a strong and responsive ethical and compliant culture. Besides that, our consumers, employees, shareholders and regulators expect business leaders to institutionalize governance at every point where decision-making needs to be tested for compliance & business integrity. Therefore, at RB 'Acting always with integrity' and 'Do the Right thing, Always' are at heart of our core values, which drives a culture of compliance.

The RB Ethics and Compliance program adopts its approach, guided by the Foreign Corrupt Practices Act 1977 (FCPA), UK Bribery Act 2010, World Health Organization Code and Department of Justice guidelines. We have institutionalized our Compliance program based on eight pillars for effectiveness: Conducting periodic risk assessments, Designating appropriate oversight and resources, Implementing written Policies and Procedures, Developing effective lines of communication, Conducting effective training and education, Conducting internal monitoring and auditing, Responding promptly to detected problems and taking corrective action and Enforcing standards through well publicized disciplinary guidelines, with an emphasis on leaders.

Risk management as base of compliance program

At RB, we apply the highest standards of ethical business, in both spirit and conduct, in our day-to-day work and do our part to advocate compliance and ethical business practices. Risk Assessment forms are based on our Compliance Program, which covers compliance of the Code of Business conduct, Anti-Bribery and Anti-Corruption, Interactions with Health Care Entity/Professionals, Third Party Code of Conduct, Data Privacy Governance, Anti-trust, Conflicts of Interest and Gifts & Hospitality. In addition, RB commits to fully complying with all laws, regulations and our Breast Milk Substitute marketing policy in relation to the manufacturing, distribution and marketing of all infant and nutrition products.

We believe in continuous improvement. The compliance risk exposure is revisited annually at country/market level, to bolster compliance risk management efforts to prepare for and respond rapidly to evolving threats. Regular risk assessment exercise also ensures customization of risk management efforts, based on identified high risk areas which may partly differ between different countries/markets. This risk management helps business leaders in adoption of smarter solutions and ways of dealing with business operations to mitigate risks and enhance ethics. Standard risk management tools are developed to ensure consistency of risk assessments across various geographies.

Managing Third Party Risk through Due Diligence

As set out in the Global Anti-Bribery and Corruption Policy, RB is committed to doing business to the highest ethical standards to help maximize the long-term sustainability of our business

RB Compliance journey has evolved over a period of time and will continue to evolve.

and of the communities in which we operate. As part of our commitment, we only work with Suppliers, Distributors, Customers and other Business Partners (collectively, "Third Parties") who share the same commitment and values to high ethical standards and operate in a responsible way. RB takes a risk-based and tiered approach to complete Due Diligence (DD) on its Third Parties via an online platform. This online platform is used to support the objective of gathering specific information and identifying legal and compliance risks in connection with Third Party engagements and other parties to ensure the behavioral, operational and reputational expectations we set for Third Parties are satisfied. Based on the results of these reviews and other attributes, an Enhanced Due Diligence may be triggered.

Strong ethical culture through tone from the top

RB engages in various trainings and campaigns through communications such as 'Honest Reflection on Ethics', 'Compliance Podcast', 'Responsible Ambassador', 'Compliance Newsletter', 'I am Responsible'—all with the goal of promoting RB's core values. These campaigns have been a success and have helped in creating an enhanced awareness among employees in addition to various compliance trainings launched as per the compliance calendar. Trainings are translated into 26 different languages across various regions, it includes a series of interactive videos, case studies, the knowledge assessment and is being delivered both online and face to face. There are Regional Compliance committees at market level in addition to Business units and Group Compliance Committees, which meet at least quarterly, to provide good governance at top and bring required ownership and accountability of senior management in compliance initiatives. These Compliance Committees are chaired by the CEO with CFO, HR Head, Compliance Head, Legal Head and Regulatory Head as members to ensure and track overall compliance risks and mitigation.

Attitudes, Beliefs and Behaviors

When it comes to a shift in mindset, these

are areas we continue to work on with significant progress:

- Pride in being entrepreneurial and nimble and in exercising good judgment efficiently
- Driven by a balance of long- and short-term business aims (targets, market share, entry into new markets, market retention)
- Improved FTSE ranking and acceptance into additional ethical investment indices (e.g., DJSI and others)
- Sustainable relationships with reliable third parties and strong market presence based on respect for both cultural and regulatory differences
- People surface problems, ask questions, discuss trade-offs, and brainstorm ideas
- Efficient collaboration and shared understanding between business areas to drive quality

Streamline Policy Management to increase responsiveness and boost policy and procedure effectiveness

Strong policy management is essential. It is the basis for clear and direct communication with employees and for the establishment of consistent and repeatable processes. Policies are streamlined and kept up to date on the intranet, available for all employees in 26 different languages globally. There are global policies covering all important aspects of compliance in a highly regulated environment, which are further streamlined by regions and markets by incorporating local requirements in SOPs if they are more stringent than global guidance. There is zero tolerance at RB for deviation to these policies.

Technology as cutting edge to drive compliance

In an environment with ever-changing threats, perpetually rescoping compliance focus and keeping compliance policies and activities up to date are paramount and made much easier with the aid of technology. RB invests in tech-enabled infrastructure to support a modern, data-driven compliance function. Tools & Technology are in use for managing speak-up cases, gift register, recording interactions with Health Care Professionals, arriving at Fair Market Value for events, expense management and due diligence checks. More and more investigators use data analysis techniques to investigate and expose fraud/compliance violations, which are non-negotiable as part of an independent speak-up process. RB utilizes technology to provide targeted, engaging and

up-to-date compliance trainings. To increase the effectiveness of Compliance monitoring efforts, a plan is in place for using technology to arrive at compliance Key Risk Indicators.

Enforcing Standards Through Well Publicized Disciplinary Guidelines

Compliance officers grapple with an ever-more complicated risk landscape and the ever-changing regulatory requirements. RB is committed to continuously evolve the Compliance program to meet strategical changes in business and mitigate everchanging external environment. To this effect there are monthly Compliance Leadership meetings to share compliance best practices implemented in their respective region and updates to the Compliance program. This forum also helps to share emerging compliance risk globally and in their respective regions. Also, there is Compliance Maturity program, which helps to access process maturity of compliance initiative based on eight compliance pillars.

RB's Compliance journey has evolved over a period of time and will continue to evolve. This Compliance program facilitates to achieve the highest level of transparency, accountability, responsiveness, alignment with the law and empowerment for all stakeholders. At RB compliance is the way to do business, where the expectation is to always do the right thing to lead with example, and to be responsible always, no matter how hard it is, that is how we as RB always operate.



Author Biography

 **Bhavya Hasija** is Regional Compliance Director, Ethics and Compliance, RB Health South Asia & AMET. Bhavya is an India qualified CA, CISA with extensive experience implementing, evaluating, and monitoring compliance programs for multi-national corporations. Currently Regional Compliance Director, Ethics and Compliance at Reckitt Benckiser Health based in Gurgaon, Bhavya has a large international footprint of experience, managing global ethics and compliance at India, Sri Lanka, Bangladesh, the Middle East, Africa and Turkey. Bhavya is part of the company's Leadership Team in these markets and provides strategic direction to overall compliance strategy, framework and implementation of Compliance programs and initiatives.