Living our Values

Reckitt Benckiser Group plc (RB)
Code of Conduct
Letter from the CEO

At RB, we are all inspired by a vision of a world where people are healthier and live better.

Our purpose is to make a difference by giving people innovative solutions for healthier lives and happier homes. We also strive to be the world’s leading nutrition company for babies and children and to nourish the world’s children for the best start in life.

Our core values (responsibility, ownership, achievement, entrepreneurship, and partnership) underpin this shared vision.

The purpose of RB’s Code of Conduct (the “Code of Conduct” or simply the “Code”) is to ensure that employees and contractors across the Group have a clear understanding of the principles and ethical values that RB wants to uphold. We expect all our people to read, understand and follow the Code of Conduct.

Compliance with the Code of Conduct is essential for maintaining and building the reputation of RB as a responsible and trustworthy corporate citizen for stakeholders, including consumers, customers, business partners, employees, clients, suppliers, shareholders, the local communities we operate in and others.

I am confident that by abiding by the principles set out in this Code, we can meet our ambition to change things for the better.

Sincerely,
Rakesh Kapoor
Chief Executive
Living Our Values

RB’s core values are a set of interwoven principles and behaviours. The Responsibility value is at the centre. Each is vital.

Living Our Values puts acting responsibly at the centre.
We conduct business honestly and with integrity and do the right thing. We must act fairly and treat others with respect. We look for opportunities to improve our products, develop the talent of our people and innovate for results. We drive for outperformance and take responsibility for our work, for the impact we have on society and the environment in which we operate, and for delivering sustainable results to our stakeholders.

The Code of Conduct serves as a guide and standard to translate our values into everyday behaviour and to keep us working toward a common goal – to behave ethically and in accordance with our values, our policies and procedures, and applicable laws.

How do I translate RB’s values into behaviour?

1. Apply the highest standards of ethical business conduct, in both spirit and conduct, in your day-to-day work and do your part to advocate compliant and ethical business practices.

2. Report any conduct that you observe that is potentially unethical, unlawful, unsafe, or otherwise conflicts with the Code of Conduct or RB policies and procedures.

3. Read, understand, and comply with this Code of Conduct and applicable RB policies and procedures.

4. Participate in Code of Conduct training and complete all assigned compliance training promptly.
What is Expected of Everyone?
In our constantly changing and diverse global environment, it is not unusual for employees to have questions concerning ethical or legal matters. RB’s Code of Conduct and our policies, along with your common sense and good judgment, may be all you need to make the right decision. However, some situations may be more complex. Remember – when in doubt, ask.

The Code of Conduct cannot address every situation that may occur in the workplace. Therefore, when there is doubt, you should ask yourself the following questions:

• Is my action legal?
• Is my action the right thing to do?
• Would I be okay with my action if I knew it would be reported in the media?
• Would I be comfortable explaining my action to my family and friends?

What is Expected of Managers and Supervisors?
Managers and supervisors have additional responsibilities for compliance with this Code of Conduct and should lead by example at all times.

Raising Concerns
We are each responsible for living our values. If you become aware of a situation that may involve a potential or actual violation of the Code of Conduct or any applicable law, policy or procedure – whether intentional or unintentional – you must report the issue promptly. Doing so will allow RB to address the issue and resolve it, ideally before it becomes a violation of law or a risk to health, security or RB’s reputation.

Speak Up Service
RB has a Speak Up hotline, which enables employees to voice their concerns about non-compliances with the Code of Conduct, our policies and procedures, and applicable laws. In accordance with RB’s policy on the use of this service, RB offers confidentiality and anonymity to employees who report their concerns. RB also guarantees that there will be no retaliation against anyone who voices a concern in good faith.

You have two options for making a report:
• Online Reporting to submit a report using the online reporting tool, please refer to the link at https://secure.ethicspoint.eu/domain/media/en/gal/102030/index.html
• By Telephone to submit a report by phone, please refer to the international toll-free lines available at https://www.rb.com/responsibility/policies-and-reports/whistleblower-policy/. In some countries, you will be able to call direct while in other countries you may need to first dial your corresponding access code. Please follow the instructions provided. Translators will be available to help you report your concerns in your local language.

Disciplinary Action
All employees are required to comply with this Code of Conduct. We may take disciplinary action, up to and including termination of employment, against any individual who:

• authorises or participates in a violation of this Code of Conduct, the law, or any RB policies or procedures;
• fails to report a violation or withholds relevant information about a violation;
• improperly or negligently supervises a person who commits a violation;
• retaliates against a person who reports a suspected violation; or
• fails to cooperate in any investigation into a potential violation.

Resources
You have several options for raising issues and concerns. You can contact or report to any of the following:

1. Any manager or supervisor
2. Your local Human Resources representative
3. Your Compliance Officer
4. A member of the Legal team
5. RB’s confidential Speak Up hotline service
In order to live our five core Values, employees must treat one another respectfully.

**Fair Treatment of our Employees**
We are a global organisation that recognises differences in culture across regions. In order to live our five core Values, employees must treat one another respectfully, recognising cultural differences and traditions, and take steps to foster an environment of tolerance and open, honest communication.

In employment-related matters (including recruitment, access to training and promotion, transfers, employment termination, discipline, compensation and benefits), decisions are made on the basis of merit. RB is committed to equal opportunities at work. Colleagues should not engage in or support discrimination or harassment based on any protected category, including race, colour, language, caste, national origin, indigenous status, religion, disability, gender, marital status, sexual orientation, union membership, political affiliation, pregnancy, veteran status or age.

Employees and any visitors to a RB location have the right to work in an environment that is free from intimidation, harassment and violence. Any act or threat of violence, and any verbal or physical conduct that creates an intimidating, offensive, abusive or hostile work environment, will not be tolerated. In addition, unwelcome sexual advances, requests for sexual favours, and other unwelcome verbal or physical conduct of a sexual nature are strictly prohibited.

Failing to follow this standard could lead to disciplinary action up to and including termination as well as criminal prosecution. Employees should report any form of harassment they have been subject to or witnessed. Retaliation against anyone who speaks out in good faith when they perceive that a co-worker or manager has violated RB’s policies will not be tolerated.

**Health and Safety**
RB is committed to providing a safe and healthy working environment and to assuring, so far as is reasonably practicable, the health, safety and welfare at work of its employees and contractors and visitors. RB’s policies and objectives related to health and safety are publicly available and a management system is in place to coordinate the management of occupational health and safety across RB. Employees and contractors have a duty to take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions. Employees and contractors must use all work items provided by RB correctly, and in accordance with the training and instructions they received to use them safely.

Consistent with our commitment to providing a safe and healthy workplace, employees and contractors must never possess drugs or other substances on RB premises which they are not authorised to possess, nor should they sell, exchange or purchase drugs or illegal substances on RB premises.

**Respect for Basic Human Rights**
RB believes that human rights are a universal requirement and is committed to upholding those rights expressed in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organisation’s (“ILO”) Declaration on Fundamental Principles and Rights at Work. RB’s commitment to human rights is set out in RB’s publicly available policy on human rights and responsible business.

**Employee Privacy**
RB respects employees’ personal and confidential information. This means that access to such information is limited to personnel who have the appropriate authorisation and a clear business need for that information. RB exercises appropriate and due care to avoid disclosure of sensitive personal information. Likewise, employees entrusted with personal information are expected to understand and comply with their obligation not to disclose it nor to use it for any other purpose.
Product safety is fundamental to RB’s brands, business and long-term success.

*Product Safety*

RB is committed to ensuring that consumers can trust the safety of our products. It is the responsibility of every employee and contractor to make sure that our products meet our rigorous quality standards and are safe to use as labelled and directed. Each employee must ensure that he or she is performing their jobs to meet our rigorous standards.

Product safety is fundamental to RB’s brands, business and long-term success. Remember, RB’s reputation is reflected in every product we promote and sell.

*Reporting Consumer Adverse Events, Safety Concerns and Quality Events*

The health and well-being of our consumers is our number one priority, so both the quality and safety of our products are important.

For this reason, it is the responsibility of every employee (or any agent working on our behalf) to report any feedback received indicating dissatisfaction related to the use of any of RB’s products, including safety, quality or performance to your local safety/quality team or Drug Safety Officer.

These reports may come to our attention in a variety of ways including social media, media, face to face conversations or any other route.

Remember, even a suggestion or anecdotal report that there is an issue with a product must be taken seriously. Any statement or comment from any person or institution suggesting that they are dissatisfied with a product (including quality, safety, identity, instructions, or performance) must be forwarded to the contacts below within 24 hours of awareness.

If an issue does come to your attention, if possible collect the 4 basic elements below. However, if you cannot collect this data please still report this issue to your quality/safety team or your local Drug Safety Officer:

1. **PRODUCT**: What is the brand name and strength of the product?
2. **PATIENT**: Who experienced the event? Record their name/initials, gender and age.
3. **EVENT**: What happened and when did it occur? Were there any symptoms?
4. **REPORTER**: Who reported the event? Record their name, phone number and address.

Reporting any of these issues is a legal requirement and non-compliance can result in:
- the triggering of regulatory inspections.
- fines, criminal sanctions, claims for negligence.
- loss of credibility with authorities and consumers.

For the Infant and Child Nutrition portfolio of products:
- send the information you have collected to mailto:globalqualityevents@mjn.com within 24 hours of becoming aware of the issues.

For all other products:
- You will find the link on our Rubi website. By navigating here you will find the specific mailbox to send the contact details to your local Drug Safety Officer (DSO) within 24 hours of becoming aware of the issues.
Marketing Activities
RB’s approach to marketing is underpinned by our ethical marketing ethos and our desire to put our consumers at the front of every decision. More information about our ethical marketing principles is available on our website https://www.rb.com/responsibility/ethical-marketing/.

All of RB’s products are sold on the basis of their quality, efficacy, safety and price. Advertising and labelling on our packaging, as well as on all other RB communications, must be truthful, and specific claims must be fair and substantiated. RB will work to continuously improve its products by engaging with our customers to develop products which are reflective of their evolving needs and requirements. Materials created for use in marketing our products must be reviewed to check they comply with applicable policies, and approved before they are used. Employees should always follow their established processes for obtaining legal and regulatory approval before executing a marketing campaign.

Interactions with Healthcare Professionals
Interactions with health-care professionals (“HCPs”), healthcare entities (“HCEs”), and government officials that involve transferring anything of value (for example payment for service, gifts, sponsorships for attending events, grants, or any other benefit) have the risk of being perceived as an inducement or bribe to provide an advantage to RB in return.

Recognising the importance of responsible behaviour, we follow global compliance standards and processes to ensure that RB:
- never offers or provides inducements to HCPs or HCEs to win business or to use, prescribe, purchase, influence, or recommend RB products or reward past purchases.
- never rewards past purchases.
- interactions with HCPs and HCEs comply with all applicable legal and regulatory requirements.

We have specific policies about interactions with healthcare professionals to which all employees and contractors should adhere to.
Integrity and Responsibility to Our Shareholders and Stakeholders

We are all responsible for documenting and recording RB information honestly and properly.

**Keeping Accurate Records**

Investors and the public rely on RB’s employees to deliver on its commitments, present accurate and timely information and maximise the return on shareholder investments. Therefore, we are all responsible for documenting and recording RB information honestly and properly. Regardless of our position or job responsibilities, we are obligated to make certain that RB’s books and records are accurate.

Books and records must be maintained in all respects according to law and the accounting principles, policies and procedures that RB has adopted.

We are all expected to:

- Accurately and honestly provide information in business reports and records.
- Make sure that all entries are timely and accurate such as on expense reports, project reports, time sheets, employment applications, balance sheet reports and profit and loss statements.
- Pay attention to detail and ensure that records are accurate.
- Never create or alter records so that they fail to accurately reflect the true nature of the transactions.
- Never record transactions that have not or not yet occurred.
- Never destroy documents or delete data that could be required to support an investigation of wrongdoing or that is relevant to actual or foreseeable litigation or investigation.
- Never create or alter records so that they contain false data, dates or signatures.
Protecting Confidential Information
One of RB's most valuable assets is information. Employees might have access to various types of proprietary, confidential, personal or private information belonging to RB or its consumers, customers, suppliers, employees, or others. Employees must only use confidential information for its intended purposes and as part of their duties. This means that we do not disclose confidential information to anyone outside of RB except when the disclosure is required by law or for a specific and proper business purpose.

We have a duty to protect confidential information at all times, including outside of the workplace and working hours, and even after employment ends.

Q. What is confidential information?

A. Information that RB has not disclosed or made generally available to the public.

Examples include information related to:
- market share data or unpublished financial data.
- strategic and business plans including new product launches and mergers and acquisitions.
- sensitive information such as contracts, pricing, intellectual property, employee data, manufacturing processes, process improvements and customer and supplier lists.
- equivalent information about other companies which they have provided under non-disclosure agreements or which has otherwise been provided in confidence.

We are all expected to

- use RB, consumer, customer, supplier, or employee confidential information only for its intended business purpose.
- comply with non-disclosure agreements to which RB is a party.
- help keep confidential information confidential. If you receive information that is not marked confidential, but you believe that it is confidential, bring it to the attention of the person who gave it to you and follow up to make sure the information is properly classified and protected.

- use only legitimate, publicly available resources if your duties require you to perform research to gain an understanding of competitors' business and strategies. Do not use actions that are illegal or unethical.
- refuse to accept confidential information from inside or outside sources that you are not authorised to receive and notify your supervisor or manager.
- remember that your obligation to protect confidential information learned at RB continues even after you leave RB.
Data Privacy

In the normal course of business RB receives, collects, maintains and uses significant amounts of personally identifiable data from individuals related to their financial, medical and benefits information. Some of this data may include sensitive information that may refer to a person’s health, or relate to employees, customers, consumers, research subjects, vendors and competitors.

Insider Trading and Securities Law Compliance

At RB, we have access to information about RB and its operations. At times, that type of information may be material, non-public or “inside information” and would be information an investor would consider relevant in deciding whether to buy or sell shares.

Confidential or inside information obtained through employment with RB may not be used for personal benefit. As employees, we are prohibited by law from trading RB securities, or the securities of other companies, while we are aware of any material inside information which is not publicly available. We are also prohibited from disclosing such information to other people, including family members and friends.

Employees and contractors should adhere to the principles, policies and procedures that RB has adopted in respect of insider trading and securities law compliance.

We are all expected to

- safeguard personal or sensitive information at all times by keeping it electronically and physically secure.
- only disclose or share personal or sensitive information with those who have a need to know it while complying with any permissions or restrictions covering its storage and use.
- properly designate information as confidential or sensitive and handle such information in compliance with applicable laws and RB policies.
- comply with RB guidance and policies on privacy and confidentiality, including any applicable limitations for use and disclosure of information that is entrusted to us by our customers, employees, vendors, partners, consumers and research subjects.
- never create or alter records so that they fail to accurately reflect the true nature of the transactions.
- report a breach immediately to Information Security Services/Legal, if you suspect that personal or sensitive information has been breached (whether deliberately or inadvertently).

We are all expected to

- not purchase or sell RB issued securities if you have inside information at the time of purchase or sale.
- not “tip” other employees, friends or family about non-public information so that they can gain an improper advantage for a potential securities trade.
- consult with a representative from Legal if you have any doubt as to whether the information you are holding is material and/or non-public.
- not engage in “short sales”, trade in puts, calls or other options to avoid the appearance that any employee is trading on material inside information.

Interacting with Stockholders, Analysts, the Media and the Public

When RB provides information to the public and the media, it has an obligation to report all related facts accurately, completely and in a timely and comprehensive fashion. As a publicly listed company, RB must follow strict guidelines when communicating to the public. In order to ensure that RB complies with its obligations, employees receiving questions about RB’s activities, results, plans or its position on public issues, should refer the requests to the Investor Relations or the Communications function as appropriate for a response.

All employees and contractors should adhere to the principles, policies and procedures that RB has adopted in respect of interactions with shareholders, analysts, the media and the public.
Government Investigations and Other Legal Matters

Almost all business records – including email and electronic records – may become subject to disclosure (possibly public) due to litigation or government investigation.

When you know, reasonably believe, or have been notified that a regulatory investigation or any litigation is expected or ongoing, you must retain and preserve all related documents regardless of format.

Q. What is a “record”?

A. A record is any recorded information, however it has been created, received, modified, maintained, archived, retrieved or transmitted that supports our business activities. This includes, but is not limited to, paper, microfilm, e-mail messages, photographs, electronic and digital records (CDs, portable storage devices, computer tapes, disks, etc.), and Word, Excel and other documents.

We are all expected to

- maintain all business records in compliance with applicable laws and RB’s record-keeping policies and procedures.
- ensure that up-to-date procedures for unannounced inspections from regulatory authorities are adhered to.
- refrain from obstructing an ongoing investigation or do anything which could be perceived as attempting to improperly influence the course of an ongoing investigation.
- never alter, conceal or destroy any documents or records that are subject to an expected or ongoing investigation or litigation matter.
- never lie or make misleading statements to a government investigator or RB management.

Protecting Company Assets

RB facilities, equipment, materials, property, product technology and information have been acquired through the hard work of employees and at RB’s investment and expense. We must ensure that RB property is only used for proper business or management-approved purposes.

We have a responsibility to protect all RB assets against damage or misuse. Employees who engage in theft, fraud, embezzlement or misappropriation of RB’s assets will be subject to termination and will be referred to the police.

We are all expected to

- be familiar with RB policies and procedures related to RB resources, and ask your manager for guidance and/or approval before making any personal use of RB assets.
- never waste or damage RB assets or misuse them for your own personal interest, or to reduce your own personal expenses.
- ensure that any personal use of RB resources does not adversely affect your work performance or cause disruption in the workplace.

Careful Communications and Use of Electronic Resources

Employees and contractors are expected to take care when communicating via electronic means. RB’s policies and procedures on communicating with care should be adhered to at all times.
Integrity and Responsibility to Our Shareholders and Stakeholders Continued

Conflicts of Interest
A conflict of interest arises when individual interests, including personal, social and financial, interfere with your ability to objectively and effectively perform your job. You must avoid any interest, investment or association that may interfere with your ability to exercise your best judgment, or to act in the best interests of RB while performing your job. This includes avoiding business dealings between RB and yourself, a family member, a friend or a business in which you or a family member or friend has a substantial interest or benefit.

You must avoid personal relationships at work that improperly influence sound, objective decision-making. No family member or partner should be hired in a position that places him or her in a position that has direct decision-making authority over another family member or partner, and you should avoid even indirect reporting relationships with family members, partners or others that could result in real or perceived preferential treatment or favouritism.

You must also not compete with RB in any outside business interests, or take an RB business opportunity for personal gain.

Exchanging Business Gifts and Entertainment
The act of exchanging business gifts and receiving corporate hospitality can play a healthy role in building business relationships. However, gifts and hospitality are problematic if they create actual or perceived conflicts of interest, or otherwise appear to influence a business decision.

Accepting gifts, discounts, favours, or services from a current or potential customer, competitor, or supplier is prohibited if that benefit is of a type or amount which has the potential to influence a person’s business decision. As a minimum, employees and contractors must adhere to all local legal and regulatory requirements relating to business gifts and entertainment in the jurisdictions in which RB operates. Employees and contractors must read and comply with RB’s global policy and standard operating procedures on gifts and hospitality and should consult with a manager or Legal if they are uncertain about what to do.

Q. What kinds of situations are most likely to create potential conflicts of interest?
Examples include any of the following:
- Performing work for an RB customer, competitor, supplier or contractor while you are still employed by RB.
- Hiring or supervising immediate family members, partners, friends or relatives.
- Owning or having a substantial financial interest in a competitor, supplier or contractor (“substantial” meaning an amount that is more than 1% of the total capital value of an entity or represents more than 5% of the personal net worth of the employee, the employee’s family or others with whom the employee has a close personal relationship).
- Having a personal interest or potential personal financial gain from any RB business transaction.
- Giving or receiving gifts or entertainment.

We are all expected to:
- avoid situations where personal, social, financial or political activities interfere with or have the potential of interfering with your duty to RB.
- obtain approval from a manager and Human Resources before you undertake any outside activity that could create the appearance of a conflict of interest.
- disclose and resolve any existing situations that potentially create a conflict of interest or the appearance of one.
Integrity and Respect in the Global Marketplace

We are committed to complying with all laws and regulations in each of the countries in which we conduct business.

Fair Competition
We are committed to conducting our business activities in full compliance with the competition laws of the countries in which we do business.

We do not share non-public information regarding pricing, costs, product supply, customers, marketing or territories, or other sensitive product information with competitors, nor do we use our market position to illegally influence the legitimate activity of a competitor.

The following arrangements with customers need special consideration and should always be reviewed by Legal:

- Entering into agreements with customers that limit a customer’s right to sell a product or that obligate the customer to buy certain RB products before they can purchase other ones.
- Charging different prices (not including individually negotiated prices under contracts reviewed by Legal) to similarly situated customers.
- Pricing of a product below cost and certain other pricing and promotion policies, especially when we have a substantial share of the local market.
- Refusing to conduct business with a particular person or business (or causing others to do the same) as a result of doing business with one of our competitors.
- Terminating business relationships outside the scope of a negotiated agreement.

RB’s policies and procedures on fair competition should be adhered to at all times.

We are all expected to

- refrain from discussing prices, pricing policy, terms and conditions, marketing plans, and similar matters of competitive interest when involved in trade association activities or in other situations involving informal communications among competitors, customers, business partners, or suppliers.

- be aware of the competition laws in the jurisdictions in which RB conducts business and understand that such laws apply to both formal and informal communications.

- immediately disengage from an improper discussion with a competitor and contact your manager and Legal.
Integrity and Respect in the Global Marketplace Continued

Bribery and Corruption
RB has a zero-tolerance attitude towards bribery. RB and its worldwide subsidiaries and affiliates are committed to complying with anti-corruption laws in all countries in which RB operates, including the United Kingdom Bribery Act 2010, the United States Foreign Corrupt Practices Act and anti-bribery legislation enacted by each signing country in accordance with the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (the “OECD Convention”). Many of these laws are drafted to have extraterritorial effect and may apply to RB wherever it does business.

The penalties for violating these laws can be severe, both for RB and for the individuals involved, including significant corporate and individual fines, and imprisonment.

A bribe includes any financial advantage or other inducement or reward which is intended to bring about the improper performance of a relevant function or activity by another person. Bribes include facilitation payments and financial advantages such as cash payments or loans, but they don’t have to be financial in nature.

Employees and contractors must not offer or give bribes to any third party, which are, or may be seen to be, intended to gain a business advantage for RB. Similarly, employees and contractors must not request or receive bribes from any third party, which may be, or may be seen to be, intended to gain a business advantage for that third party. Any dealings with public officials present a particularly high risk and employees and contractors must take great care in such situations. We may be held liable for bribes or facilitation payments paid by a third-party agent or consultant on behalf of RB. Take particular care when evaluating a prospective third-party agent or consultant to determine whether there is reason to believe that the agent or consultant may attempt to offer or give a bribe. Employees and contractors must read and comply with RB’s Anti-Bribery Policy and associated documents.

Working with Suppliers
RB purchases goods and services on the basis of price, quality, safety and the value they provide. RB’s relationships with suppliers are based on lawful, efficient and fair practices.

We expect our suppliers to obey the laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality. Most importantly, we expect our suppliers to promote responsible business behaviour and high standards of business conduct.

We are all expected to

- follow all procurement policies, including competitive bidding practices when engaging suppliers.
- treat suppliers fairly and professionally.
- remain objective when selecting bids from suppliers.
- only work with suppliers who are reputable, share our ethical principles of conduct, and who agree to abide by RB’s policies towards human rights and ethical business.
Protecting the Environment
RB works to protect the environment today to help create a better world tomorrow. To that end, we are committed to reducing the environmental impact of our operations and products over the short, medium and long term.

We strive to use pollution prevention and environmental best practices in all we do. Employees are expected to comply with all applicable environmental laws, regulations and RB's policies, and to report any incidents or conditions that may result in an environmental violation or have an adverse environmental impact. Employees are also encouraged to identify opportunities for improving our environmental performance, including, for example, waste reduction, and energy and water efficiency.

Political Activities
RB is not a political organisation. As a general matter, it does not support political parties nor contribute to the funds of groups whose activities are calculated to promote party interests or the election of a specific candidate, except in limited circumstances and subject to the approval of the Group CEO and General Counsel.

We respect the right of our employees and contractors to freedom of association. Accordingly, employees and contractors are welcome to participate in political activities, so long as this is done in their personal capacity using their own time and resources. Employees and contractors who are concerned about whether their political activities are appropriate should consult with their manager or Legal.

Doing the Right Thing
Wherever we are located, we operate as a team. We face our challenges, overcome obstacles, and celebrate successes together. Collaborating and supporting each other for the good of our employees, customers, communities and shareholders is how we succeed. It is important that at all times we accept only exemplary ethical conduct from ourselves and each other.