

**HALEON**

# Code of Promotion



## Table of Contents

Why do we need the Code of Promotion? .....	2
Key Promotional Principles .....	3
Sampling Programs .....	7
Consumer Coupon Programs .....	8
Promotion with Prizes (Sweepstakes, Contests, etc.).....	9
Gifts with Purchase.....	10
Gifts and Hospitality .....	11
Brand Reminders/Promotional Aids.....	12
Items of Medical Utility (IMU).....	13
Trade Activities .....	14
Engaging External Experts .....	15
Engaging Other Third Parties.....	16

## Why do we need the Code of Promotion?

The purpose of the Code of Promotion ("Code") is to ensure that, following any necessary authorisation, Haleon's activities and interactions with consumers, customers, Healthcare Professionals ("HCP"), Other Healthcare Staff ("OHS"), patient/consumer groups, media, and the general public are carried out in a responsible, ethical, professional, and legal manner. Generally, the focus of our promotional activities are consumers and customers. Haleon applies the stricter industry codes and regulations for prescription products where applicable.

The Code is applicable to Haleon and anyone acting on behalf of Haleon. The document provides global standards for promotional activities of Haleon's products. The following are Scientific Engagement activities and must be approved and overseen by Medical Affairs:

- Supporting Independent Medical Education
- Sharing Scientific Knowledge or Information
- Scientific Interactions with Payers, Governments or Healthcare Organizations
- Seeking Scientific Advice or Information

Please refer to the CH Scientific Engagement Policy and consult Medical Affairs.

## How to use this Code?

Identify the activity type you are interested in undertaking.

- "Must Do's" are the compliance requirements that must be followed.
- "Questions to Support Risk Analysis" are thought starters to support risk-based decision making.
- The "References" section provides links to any materials related to this activity for additional detail.

**If your analysis process highlights red flags or you have additional questions, please consult your local Compliance, Medical, Legal, Regulatory or Quality representative for escalation before proceeding.**

**Note:** This is not an exhaustive list of promotional activities and just because an activity does not appear here, it does not mean it is not allowed. Use risk analysis to assess the planned activity and consult Compliance, Legal, Medical, Regulatory and Quality when needed.

Always refer to limits approved by the country General Management ("GM")/ Business Unit ("BU") Head and relevant control functions on brand reminders, Items of Medical Utility, gifts, entertainment and hospitality or Fair Market Value ("FMV") for HCP/OHS engagements.

---

**Decision Maker, Advisor, Informed (DAI) model for Promotional Activities:**

The majority of decisions will be made by Commercial Managers. If exceptions are needed to this Code or there is a new activity not defined by this Code, control functions such as Compliance, Legal, Medical, Quality and Regulatory should be leveraged as advisors during the decision-making process and can escalate if a decision cannot be reached.

**Key Promotional Principles**

- **All promotional activities must be conducted in accordance with Haleon's Code of Conduct as well as our value: "Always do the right thing".**
- **This Code must be followed unless there is a stricter local law, regulation, or industry code. Local laws must always be complied with.**
- In the absence of any guidance (Code, local law, regulations, industry codes), local GM/BU Head and relevant control functions should establish local guidelines.
- All promotional material must be consistent with locally approved labelling and should be accurate, fair, objective and not include unapproved uses, nor any negative commentary about competing products. Off-label promotion is prohibited.
- All promotional materials must be approved via Content Approval Process (governed by Marketing) in accordance with the Content Approval Playbook.
- Approved global deviations to this Code are documented and saved in the "Other Useful Documents" section in the Code of Promotion section of the Ethics and Compliance Hub.

**Key Considerations for Promotional Activities**

- Proactive two-way conversations with consumers, shoppers, or experts for the purposes of understanding trends and perceptions around marketing mix are considered to be market research, not promotion, and must follow the Market Research Standard Operating Procedure ("SOP").
- Promotion in a country should occur only after any local regulatory clearance for the use has been granted in that country. Consult local Regulatory, Legal, and Medical on what can be discussed with retail customers and at what stage of the regulatory approval process, including "coming soon" or new product promotions.
- Products must not be promoted directly to children. For Consumer products deemed appropriate for children (e.g., Aquafresh Little Teeth), proactive promotion must be directed to the child's parent or caregiver. Please refer to local market guidance to determine the definition of child/children.

- Promotional activities targeted at pregnant or lactating women should only take place if these groups are indicated in the product monograph/ Summary of Product Characteristics ("SPC") for that product. Please consult with the Medical Governance Board for additional guidance if directly promoting to these groups.
- Consult the Care, Welfare and Treatment of Animals Policy to ensure that promotional materials do not contain inappropriate use or representation of animals that could cause harm to Haleon's reputation or that would likely result in a negative response from consumers.
- The word "New" (or an equivalent term) on product labels or promotional material may only be used for a period mandated by local regulations or industry code. If there are no such local requirements in a market and the word "New" is to be used for more than one year, seek Compliance alignment.
- Nothing must be offered or provided to HCPs/OHS in a way that has an inappropriate influence on the recommendation, prescription, purchase, supply, dispensing, or administration of our products.
- Technology and ways to promote are constantly changing. Therefore, for guidance specific to Digital activities please refer to the "Digital Playbook", offering risk-based decision-making support. The "Digital Playbook" and other supporting material for Digital Governance can be found on the Compliance Intranet.
- In markets where direct to consumer promotion of prescription products is permitted, any promotional materials should include the statement "Always read the label prior to use" or similar language. Local laws/regulations/industry codes pertaining to labelling and promotional materials should be followed for all other product classifications.
- Any brand promotion including a proactive social cause initiative (e.g., for every pack of X purchased 5p will be donated to X) should be aligned with Communications/Government Affairs (Country or BU as applicable) to ensure any potential reputational risks are mitigated, with support from Compliance and Legal.
- Ensure privacy principles and storage of Personal Information ("PI") are adhered to if collecting PI.
- Ensure that risk-based management monitoring occurs with the frequency aligned with the local GM/BU Head and relevant control functions.

### **Reporting Human Safety Information/Adverse Event, Product Quality Complaints and Product Enquiries:**

The safety of consumers using our products is of paramount importance. For any promotional activity, there may be Human Safety Information / Adverse Event, or a Product Quality Complaint and must be monitored and reported through respective functions. Any Haleon product related enquiry (Medical Information, Formulation

Information) arising from an engagement or activity should be reported through the Consumer Relations hub in the area or to the local Medical Information (“MI”) Administrator in markets that are not supported by Consumer Relations.

## General Promotional Activity Guidelines

		Product Classification	
		<a href="#">Prescription products</a>	<a href="#">Non-prescription and consumer products</a>
Consumer	<a href="#">Samples</a>	No	Yes
	<a href="#">Discount Coupons, Vouchers</a>	No	Yes
	<a href="#">Brand reminders</a>	No	Yes
	<a href="#">Gifts with Purchase</a>	No	Yes
	<a href="#">Promotion with Prizes</a>	No	Yes
	<a href="#">Direct to consumer detailing by reps</a>	No	Yes
	<a href="#">Volume/Product offers</a>	No	Yes
	<a href="#">Promo materials flyers</a>	No	Yes
	<a href="#">Digital channels</a>	No	Yes
	<a href="#">KOL/influencer (non-HCP) engagement</a>	No	Yes
Customer	<a href="#">Samples</a>	No	Yes
	<a href="#">Discount Coupons, Vouchers</a>	No	Yes
	<a href="#">Brand reminders</a>	No	Yes
	<a href="#">Gifts with Purchase</a>	No	Yes
	<a href="#">Promotion with Prizes</a>	No	Yes
	<a href="#">Volume/Product offers</a>	Yes	Yes
	<a href="#">Promo materials flyers</a>	Yes	Yes
HCP/OHS	<a href="#">Samples (HCPs to give to patients)</a>	Yes	Yes
	<a href="#">Samples (HCP self-familiarization)</a>	No	Yes
	<a href="#">Discount Coupons, Vouchers</a>	No	Yes
	<a href="#">Brand reminders</a>	No	Yes
	<a href="#">Promotion with Prizes</a>	No	No
	<a href="#">Science-based quizzes with Prizes</a>	No	Yes
	<a href="#">Items of Medical Utility</a>	Yes	Yes
	<a href="#">Gifts, Entertainment</a>	No	No
	<a href="#">Modest meal during "Lunch and learn"</a>	Yes	Yes
	<a href="#">Digital channels</a>	No	Yes

**Yes = permitted**

**No = not permitted**

**Prescription products:** medicines and devices that are prescription only by regulatory status and require a prescription for dispensing.

**Non-prescription products:** products that are non-prescription by regulatory status and do not require a prescription for dispensing; typically referred to as Over-the-Counter ("OTC"), Behind-the-Counter ("BTC"), and general sale.

**Consumer Product:** Products that are regulated as food, dietary supplements, nutritionals, and cosmetics.

**Note:**

- These are general guidelines only. Please refer to relevant section of this Code for more guidance.
- Always follow stricter of this Code, local laws, regulations, or industry codes.
- **Please work with Regulatory or Legal if you are unsure of the appropriate product classification for the product you are promoting.**

## Sampling Programs


### Potential Audience

- Consumers
- Customers
- HCP/OHS


#### **What could go wrong:**

- Provision of samples could be perceived as bribery.
- Samples could be diverted and sold.
- Inability to track samples during a recall.

### Must Do's

- "Sample: Not for resale" (or similar) must be on label for prescription and non-prescription products. Local risk assessment should be conducted to determine labelling requirements for consumer product samples. 
- Tracking mechanism must be in place and defined based on risk assessment.
- Ensure adequate product shelf life (expiry date) prior to sample distribution (consult QSC if unsure).
- Prescription products cannot be sampled to HCPs/OHS for personal use or directly sampled to consumers.

### Questions to Support Risk Analysis

- What is the local law, regulation, or industry code for samples in terms of size, labelling, distribution limits and recipient? 
- Are sample sizes or quantities distributed to HCP/OHS significant enough to be considered bribery?
- Is there any potential risk that samples could be sold illegally?
- Are samples being stored in accordance with product specifications (consult QSC if unsure)?
- Have third parties who are distributing on our behalf received AE (Adverse Events) training?
- Have Pharmacovigilance and Drug Safety been informed prior to sampling, if products are to be sampled to customers in advance of a product launch?

### References

- Anti-Bribery & Corruption Policy
- Pricing Governance Framework
- Third Party Risk Management (TPRM)
- HSI/PQC Policy
- Global Content Approval Procedures
- Privacy Policy





**Consumer Coupon Programs**

Potential Audience

- Consumers
- Customers – must be passed on to consumers.
- HCP/OHS – must be passed on to consumers.

**What could go wrong:**

- Inappropriate use of coupons by customers
- Financial loss due to inadequate tracking mechanism
- Violation of HCP professional codes

Must Do's

- Competition Law principles must be adhered to.



Questions to Support Risk Analysis

- Are coupons permitted in your market? Are there any restrictions related to product classification?
- Have you done a risk assessment of a coupon on a prescription or non-prescription product?
- Can the coupon value encourage excessive purchase and use of our non-prescription product?
- Is there a tracking mechanism in place for coupon distribution and redemption?
- Is the coupon amount reasonable compared to the product value and product type (based on local pricing risk assessment for product type)?



References

- Anti-Bribery & Corruption Policy
- Pricing Governance Framework
- Competition Law
- Privacy Policy



## Promotion with Prizes (Sweepstakes, Contests, etc.)

### Potential Audience

- Consumers
- Customers
- HCP/OHS (for science-based quizzes)

#### What could go wrong:

- Excessive and inappropriate prizes may lead to bribery, promotional compliance risks.
- Prizes may pose a safety risk.

### Must Do's

- Sweepstakes, contests, raffles, or the provision of prizes is prohibited for prescription products.
- Sweepstakes, contests, raffles, or the provision of prizes as part of a promotional activity is prohibited for HCP/OHS and Government Officials, however nominal prizes (value defined by relevant governance functions) can be provided for science-based quizzes for non-prescription products and consumer products.
- Trade promotions to customers, including HCP Pharmacy owners, through off invoice (contest, prizes or equivalent) require a robust governance review (including Legal, Compliance, Finance) to ensure it is justifiable, complies with Haleon policies and local laws, regulations, and industry codes.



### Questions to Support Risk Analysis

- Are sweepstakes, contests, raffles with prizes permitted under local regulations, laws and industry code?
- Can the value of prize induce excessive use of our products?
- Are prizes provided to our customer's employees? Is the program designed to improve sell-out and is a robust governance review (including Legal, Compliance, Finance) conducted?
- Are the prizes given not posing a safety and reputational risk?
- Is there a tracking mechanism in place for prize distribution and the intended receiver?



### References

- Anti-Bribery & Corruption Policy
- Privacy Policy



## Gifts with Purchase

### Potential Audience

- Consumers
- Customers

### **What could wrong:**

- Inappropriate gifts may lead to excessive purchase of products.
- Gifts targeted at children may lead to loss of brand reputation.
- Gifts may pose a safety risk.

### Must Do's

- Gifts with purchase are not permitted for prescription products.
- Ensure the value of the gift does not exceed the value of the related product.
- Ensure that gifts with purchase for non-prescription products are related to the product.



### Questions to Support Risk Analysis

- Do local regulations permit gifts with product purchases? Are there any limitations?
- Are gifts directly targeting children?
- Are gifts not the primary reason for purchase or are they not likely to influence consumers to over-purchase / over-use our products?
- Are the gifts not posing a safety risk?



### References

- Anti-Bribery & Corruption Policy
- Privacy Policy



## Gifts and Hospitality


### Potential Audience

- Customers
- HCP/OHS


**What could go wrong:**

Excessive and inappropriate gifts or cash equivalents and hospitality could be perceived as bribery and could damage reputation.


### Must Do's

- Ensure gifts and hospitality to HCPs acting in their capacity as a trade partner (i.e., HCP Pharmacy Owner), are provided only when permitted by local regulations. 
- Ensure spouses and guests are not invited to any hospitality event.
- "Lunch and learns" must be in a clinic/pharmacy setting. By exception external locations are permitted if clinic/pharmacy is not feasible.
- Coffee/tea/meal/snacks that are provided/sponsored at conferences or at meetings with customers, must be aligned to locally established limits.
- For virtual meetings/"Lunch and learns" hospitality must be provided in a clinic/pharmacy setting only.

### Questions to Support Risk Analysis

- Would the hospitality/accommodation being provided be considered lavish? 
- If a "Lunch and learn" for non-virtual meetings is conducted at an external location, is it an appropriate venue?
- Is the gift type, value, and frequency of the gift appropriate and within the defined country gift value limits?
- Are cultural courtesy gifts/holiday gifts to HCPs/OHS permitted by local laws, regulations, and industry codes?
- Are gifts and hospitality limits aligned with the approved limits set by the GM/BU Head and relevant control functions?
- Is documentation required by local law, regulation or industry code for transparency reporting or other purposes (e.g., The Sunshine Act in the US)?

### References

- Anti-Bribery & Corruption Policy (section regarding Gifts, Hospitality & Entertainment). 

## Brand Reminders/Promotional Aids

### Potential Audience

- Consumers
- Customers
- HCP/OHS

**What could go wrong:**

Excessive quantities or expensive brand reminders may be considered a transfer of value which could be perceived as bribery.

### Must Do's

- Brand reminders must follow local laws, regulations and industry code in relation to item type frequency and value.
- Brand reminders must be related to non-prescription products or consumer products only.
- Quantities provided must be low enough that they are not supplementing the routine operations of an HCP office.
- Items must include either product or Haleon branding.



### Questions to Support Risk Analysis

- Are brand reminders being offered on more than an occasional basis?
- Have Legal been consulted for items targeted to children or containing comparative claims?
- Are frequency and value of brand reminders aligned with the limits approved by the GM/BU Head and relevant control functions?



### References

- Anti-Bribery & Corruption Policy
- Global Content Approval Procedures.



## Items of Medical Utility (IMU)

### Potential Audience

- HCP/OHS

### Must Do's

- IMU must follow local laws, regulations, and industry code in relation to item type and nominal value.
- IMU must only be Haleon company branded and not product branded for prescription products. Can be product or company branded for non-prescription products and consumer products.
- Must be educational or have a beneficial impact on patient care or enhance responsible use of medicines.

### **What could go wrong:**

- Expensive IMUs may be considered a transfer of value which could be perceived as bribery.
- Reputational / Litigation risk If IMUs are not permitted by local regulations.



### Questions to Support Risk Analysis

- Are the IMU quantities or value supplementing the routine operations of the HCP practice?
- Are frequency and value of IMU aligned with the limits approved by the GM/BU Head and relevant control functions?



### References

- Anti-Bribery & Corruption Policy
- Global Content Approval Procedures



## Trade Activities

### Potential Audience

- Customers

### Must Do's

- All promotional activities must be conducted in compliance with the Pricing Risk Governance and Compliance Framework (PRGCF).
- A Pricing Governance risk assessment must be completed by the LOC annually as required by the PRGCF.
- All activities must be fully documented and recorded in a dedicated ERP system applicable to the market.
- Physical cash or near cash payments (e.g., gift cards) to customers are not permitted.
- Schemes that include non-cash offers to customers / pharmacy owners based on volume / value purchased require robust governance review (including Legal, Compliance, Finance).
- Incentive schemes to customers and their employees must be designed to improve sell-out and require a robust governance review (including Legal, Compliance, Finance) to ensure it is justifiable, complies with Haleon policies and local laws, regulations, and industry codes.

### **What could go wrong:**

Non-compliance with the Pricing Risk and Governance Framework could lead to bribery, Competition Law, promotional compliance, and fraud risks.



### Questions to Support Risk Analysis

- Am I interacting with a retailer, distributor, or wholesaler?
- Is the activity in line with the local Commercial and Pricing Policy, if in place?
- Has the trade spent been approved in line with relevant Grant of Authority limits?
- Is the recipient of the incentive scheme or non-cash offer a pharmacist or HCP? Have you considered its value and appropriateness? Is it permitted by local laws, regulations, or codes?
- Is the non-cash offer that is based volume / value purchased by customer appropriate for the customer / pharmacy owner?



### References

- Anti-Bribery & Corruption Policy
- Pricing Risk Governance and Compliance Framework
- Third Party Risk Management ("TPRM")
- Distributor Risk and Controls Framework




## Engaging External Experts

### Potential Audience

- HCP/OHS, Academics


### Must Do's

- The engagement of external experts must be in accordance with local laws, regulations, and industry codes, including transparency reporting requirements. 
- Only HCPs can be engaged to discuss the benefits of prescription products.
- Follow principles from Engaging with External Experts to Provide Services Procedure/Anti-Bribery and Corruption Policy when considering engagements with Government Officials or other External Experts with an Influence on Business ("EEIB").
- Ensure that materials used do not suggest off-label use of any product.
- Payments to HCPs for engagements drawing on their scientific expertise (e.g. Speaker Engagements, Ad Boards), payments should follow the local Fair Market Value table established and approved by the GM/BU Head and relevant control functions.
- For other commercial-type engagements (e.g. TV Commercials, Social Media Influencers) the rate paid to HCPs must be supported with a validation (comparison to similar service providers, reach of the HCP)
- Customary due diligence must be performed (validation of accreditation, conflict of interest check, disbarment by local regulatory or industry bodies, etc.)
- Transparency reporting obligations as per local laws, regulations and industry codes must be followed.


### **What could go wrong:**

- Excessive payments could be perceived as bribery.
- Unapproved materials could contain off-label promotion.
- HCP may have reputational issues not in line with Haleon values.

### Questions to Support Risk Analysis

- Has the business reason for engaging the expert been defined?
- Has all due diligence been completed, Conflict of Interest form received and reviewed? 
- Are the materials used by the external expert approved in accordance with the Global Content Approval Procedure?
- Is Haleon's involvement in promotional meetings or expert engagement verbally disclosed when required by local regulations?
- Is the engagement related to Scientific Engagement activities? If so, refer to the Scientific Engagement Code and engage with Medical Affairs.

### References

- Anti-Bribery & Corruption Policy
- Global Content Approval Procedures
- Scientific Engagement Code
- Engaging with External Experts to Provide Services 



## Engaging Other Third Parties

### Potential Audience

- Celebrities, Influencers, Sports Personalities

#### **What could go wrong:**

- Excessive payments could be perceived as bribery.
- Unapproved materials could contain off-label content.
- Third party may have reputational issues not in line with Haleon values.

**Note:** These individuals are not considered experts and may be engaged for promotional activities only.

### Must Do's

- The engagement of third parties to promote products must be in accordance with local laws, regulations, and industry codes.
- The engagement of other third parties for promotional activities is allowed only for non-prescription products and consumer products.
- Ensure the content of material used by these celebrities/influencers/sports personalities isn't perceived as influence for off-label use of any product.
- Celebrities/Influences/sports personalities must disclose sponsorship by Haleon.
- Other third parties must follow Haleon's Code of Conduct and Code for Promotion, specifically promotion agencies.
- Payments made to other third parties must be supported with a validation (comparison to similar providers, reach of the third party)



### Questions to Support Risk Analysis

- Is the engagement due diligence robust enough to ensure the right 3<sup>rd</sup> party is engaged?
- Are the materials used approved in accordance with the Global Content Approval Procedure?
- Have you consulted with Communications/Government Affairs prior to engaging the third party?



### References

- Third Party Risk Management (TPRM)
- Anti-Bribery & Corruption Policy
- Global Content Approval Procedures
- Digital Playbook
- HSI/PQC Policy