

**Rentokil**  
**Initial**

Protecting People.  
Enhancing Lives.  
Preserving our Planet.



**YOU ARE  
THE BRAND**  
CODE OF CONDUCT



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# MESSAGE FROM OUR CEO

As a Rentokil Initial colleague, you are our brand.

You represent us in what you say, what you do, and how you act with other colleagues, customers, suppliers, and other parties that you deal with at work. We expect you to always maintain the highest standards of conduct and act with integrity and respect for others. Colleagues, customers, and shareholders rightly expect nothing less.

These standards are at the heart of our vision 'to become the most loved and respected services business on the planet' and our **R**IGHT **W**AY plan to deliver success.

Firstly, we want to create a great place to work for our colleagues (THE **R**IGHT **P**EOPLE), who in turn deliver a great job for customers in the best possible way for society and the planet (THE **R**IGHT **T**HINGS), which in turn creates value for everyone, including our shareholders (THE **R**IGHT **W**AY).

This Code of Conduct, alongside our policies and procedures, sets out our company standards and applies to everyone at Rentokil Initial. It outlines responsibilities to colleagues, to customers, to suppliers, and to the company – essentially, how you should act in connection with your role in Rentokil Initial. It is important that you understand what these responsibilities are and ensure that you, anyone for whom you have responsibility, and your colleagues, always act within both the spirit and the letter of these responsibilities, at all times. If you have concerns about unethical behaviour, please report it or speak to your manager.

Achieving the highest standard of business conduct is integral to our long-term success, creating a world-class business for the benefit of everyone – more jobs, training, and promotions; better tools, innovations, and new services; smarter and more sustainable ways to work.

I undertake to all colleagues that no one will be penalised for any impact, including the loss of business, which may result from you adhering to this Code of Conduct.



Andy Ransom  
Chief Executive







CODE OF CONDUCT

# INTRODUCTION

## Why do we have a Code of Conduct?

This Code of Conduct provides the basic foundations that help guide our ethical conduct, setting the highest standards of behaviour and respecting the human rights of others. All colleagues within Rentokil Initial (RI) must follow this Code. The Code establishes our principles of business conduct, linked to our Values, ensuring we do the right thing for our people, our customers, and our other stakeholders around the world.

## How to use the Code of Conduct

The Code is intended to be used as a practical tool you can apply in your everyday working life. It is divided into clear sections, with key topics in each section, so you can find your way around it easily. Each topic explains the company's position, sets out some practical steps we must all follow, and directs you to where to get further help. There is also a Q&A for each topic to provide examples of real-life situations and how best to handle them. Finally, at the end of the Code there is guidance on how to deal with ethical dilemmas and details of where to seek further advice and how to report concerns.

### What about different country laws?

This Code establishes principles that apply across the Rentokil Initial group and is intended to give guidance on common legal or ethical issues – it is not intended to describe every law and policy that might apply to you. If there is any doubt as to whether to follow a local law or this Code, you should follow whichever sets the highest standard of behaviour.

### Does the Code include all policies?

The Code is not meant to replace detailed policies, but is a statement of our principles in a number of important areas and sets the framework within which all other policies should be interpreted. Group-wide policies can be found in the Core Group Policies Library on the RI Intranet; from the home page, click the “Core Group Policies” tile to navigate to this library. Some group policies lay down absolute standards. Others give guidance indicating a framework within which businesses must set their own individual operating procedures, which will be communicated directly to you as they affect the performance of your job.

## Our Mission, Vision and Values

### Our Mission

Protecting People. Enhancing Lives. Preserving our Planet.

### Our Vision

To become the most loved and respected services business on the planet – delivering in the RIGHT WAY.

### Our Values



SERVICE



RELATIONSHIPS



TEAMWORK



RESPONSIBILITY

## Violations of the Code of Conduct

Violations of the Code or laws and regulations may subject employees to disciplinary action including termination of employment.

As a Rentokil Initial colleague, you are expected to act in accordance with company values and business principles and comply with company policies, as well as national laws and applicable regulations and to respect the human rights of others. The company values and business principles are an expression of who we are and how we want to be perceived by others.





CODE OF CONDUCT

# LOOKING AFTER PEOPLE



## Health and Safety

**There is nothing more important in Rentokil Initial than ensuring that 'Everyone Goes Home Safe' at the end of their working day.**

Our colleagues, families and customers rely on this commitment. Health and safety will always be our first priority and there can be no compromise on this.

The strategy for how we run our company is called the **RIGHT WAY** and at the very heart of our strategy, is our commitment to health and safety. Our health and safety policy requires all businesses to implement an effective health and safety management system in order to protect the health and safety of our colleagues, our customers, and anyone else who may be affected by our work activities. We are committed to ensuring that:

- Our leaders provide visible safety leadership and engage with colleagues to instil safe behaviours and create a strong safety culture.
- Colleagues have the training and tools to enable them to do their job safely and are empowered to make the right decisions about their safety, first time and every time.
- All health and safety risks are understood, evaluated, and controlled by adopting best practices in all of our work procedures.
- Health and safety performance is regularly monitored, reviewed, and publicly reported.
- We act on what we learn to continually improve our health and safety performance.



**Ensuring everyone goes home safe**

Accidents are not inevitable, and we are committed to preventing them. In order to do this, operational management encompasses an extensive range of measures to protect people, the most significant of which are our SHE Golden Rules. The Golden Rules of Safety, Health, and Environment (SHE) explain what we must all know and do to keep ourselves, our colleagues, and our customers safe, while the Pink Notes process ensures that the risks and consequences of all new and existing activities are understood and addressed.

Health and safety is everyone's responsibility. Therefore, all colleagues must take personal responsibility for both their own health and safety, and that of other people affected by their work and the decisions that they make. Colleagues must adhere to safe working practices and cooperate fully with managers on any matter relating to health and safety.

### ALL COLLEAGUES ARE EXPECTED TO:

- Conduct their work safely and responsibly and in a way that complies with company rules, safe working procedures, and applicable health and safety legislation.
- Report any unsafe behaviour or situation that poses a risk to health and safety.
- Promptly report any accidents or other incidents, including near misses.
- Stop work if there is an immediate risk/danger to safety and contact their manager.
- Cooperate fully with managers on any matter relating to health and safety.

## For further information and advice and to report concerns

### READ

Please refer to the Health and Safety Policy on [www.rentokil-initial.com](http://www.rentokil-initial.com) and the SHE materials on the RI Intranet, as well as the Pink Notes on the Group Technical Hub.

### SPEAK

You can speak to your manager or your local SHE team.

### REPORT

You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.

## Q&As

**Q: I know a customer wants to speak to me urgently and they call me when I'm driving. I don't have a hands-free kit, but can I quickly answer and tell them I will pull over and call back?**

**A:** No. You must not use hand-held mobile phones/devices whilst driving. Pull over when safe and then call back.

**Q: I have arrived on site to undertake an urgent job which requires work at height but I do not have the correct access equipment and PPE. What should I do?**

**A:** Stop! Do not proceed. Speak to your manager. You must only start work if you have the right equipment and PPE to carry out the work safely.

## Equality and Fairness

**We value diversity and inclusion and insist on fair treatment for all in a work environment free of discrimination and harassment.**

Rentokil Initial is committed to treating all colleagues, customers, suppliers, and any other individuals with dignity and respect and to complying with all relevant employment laws and regulations to ensure a discrimination-free environment for all. The company's values promote a culture where mutual respect and individual growth are key ingredients in our success.

It is usually unlawful and always contrary to this Code to give less favourable treatment or engage in any conduct that negatively affects another colleague (such as imposing discipline, rejecting someone for promotion, affecting someone's pay or benefits) or to harass another person on the basis of gender (including gender identity), age, race, skin colour, ethnic or national origin, trade union membership, marital status, pregnancy, disability, religion, sexual orientation, or other discrimination forbidden by local law.

Rentokil Initial will not tolerate any verbal or physical conduct that could be considered intimidating, hostile, or offensive and will take appropriate disciplinary action in cases of unacceptable conduct.

### Examples of harassment could include:

- Using offensive nicknames, language, or gestures.
- Unwelcome and inappropriate jokes, teasing, or banter.
- Displaying offensive emails, pictures, or clothing.
- Physically threatening or intimidating someone.
- Excluding others from conversations or social events.

### Examples of sexual harassment could include:

- Unwelcome advances, propositions, or flirting.
- Unwanted physical contact or staring.
- Inappropriate comments about a person's appearance including their clothing or body.
- Lewd or suggestive remarks, questions, gestures, language, stories, or jokes.
- Sharing inappropriate images or videos.

### ALL COLLEAGUES ARE EXPECTED TO:

- Never unlawfully or unfairly discriminate against individuals or groups based on factors not relevant to their ability to perform their job.
- Behave in a professional and courteous manner and not to engage in harassment, bullying or offensive behaviour in the workplace.
- Take personal responsibility for upholding company standards by treating with dignity and respect all job applicants, other colleagues, contractors, customers, and all parties with whom they come into contact in the course of our business.
- Conduct recruitment processes and management of colleagues based on merit and in a way that values, rather than simply tolerates, differences and allows a flexible and inclusive work environment that supports all of our people in achieving their potential.
- Report any concerns of discrimination and harassment and cooperate in any investigation that is conducted. Managers should properly investigate any concerns that are reported to them.

### For further information and advice and to report concerns

#### READ

Please refer to the **Dignity at Work & Human Rights and the Diversity, Equality & Inclusion policies under Core Group Policies on the RI Intranet**, as well as **local HR resources applicable to your business**.

#### SPEAK

You can speak to your **manager, HR team, your local legal team if you have one, or Group Legal**.

#### REPORT

You can report any concerns using our **confidential Speak Up reporting system** or any other method described on page 29.

### Q&A

**Q:** I have worked in a mainly male team for several years until recently when a few more women have joined. We enjoy quite a lot of male banter, but recently one of the new joiners became offended by some of our language. It felt like an over-reaction, but do we need to moderate our behaviour to avoid offending them even if this is what we have always done and don't mean any harm by it?

**A:** We should be polite, professional, and respectful in the workplace. We should be conscious of our behaviour and need to ensure we avoid causing offence in the first place. If someone has indicated they are offended then yes you definitely should change your behaviour and language to ensure we maintain a great working environment for everyone.



# Human Rights

**Colleagues must respect the human rights of their colleagues and all parties with whom they deal.**

Rentokil Initial is supportive of the fundamental human rights of colleagues and other individuals and is particularly vigilant to ensure these principles are upheld when operating in territories where human rights standards are of concern. The company operates strict rules over the establishment of business operations in new territories to ensure appropriate safeguards are put in place so no individual's fundamental human rights are compromised.

Rentokil Initial adheres to the legal minimum age requirements in all the countries in which it operates. In the unlikely event that children between the age of 16 and 18 are employed, the company ensures this work does not affect or preclude schooling.

Rentokil Initial will under no circumstances make use of forced or coerced labour, servitude, or slavery and will only employ individuals who are working of their own free will. No colleague will be deprived of identity papers, or be required to provide financial inducements to the company, to facilitate their employment.

The company has also put in place procedures with a zero-tolerance approach to its suppliers relying upon the use of forced or child labour in connection with the provision of services or products to the company, as mandated in the Supplier Code.

### ALL COLLEAGUES ARE EXPECTED TO:

- Respect the rights of all colleagues and other individuals with whom they come into contact.
- Require suppliers and other business partners to adopt similar standards regarding human rights.

**For further information and advice and to report concerns**

#### READ

Please refer to the **Dignity at Work & Human Rights Policy** and the **Supplier Code** under **Core Group Policies on the RI Intranet**.

#### SPEAK

You can speak to your manager, HR team, your local legal team if you have one, or **Group Legal**.

#### REPORT

You can report any concerns using our confidential **Speak Up** reporting system or any other method described on page 29.

### Q&A

**Q: I recently visited a supplier and saw people working in the packing room who appeared to be under 16. What should I do?**

**A:** Remind the supplier of our policy and our requirement that our suppliers do not employ children. Ask them for evidence (if safe to do so) that the people you saw are of working age. If this is not possible, discuss the matter with your line manager or raise it with your company's Procurement Manager. We must not work with suppliers who use child labour so seek advice to ensure this is managed appropriately.

# Protecting Personal Information

**We must all take care of the personal information we handle.**

We routinely hold and deal with information relating to individuals, such as employees (past and present), job applicants, customers, suppliers and other business partners (and their staff). Personal data relating to individuals from which they may be identified must be handled responsibly and securely: this includes names, addresses, telephone numbers, email addresses, employment contracts, disciplinary records and even opinions.

Most countries where we operate have laws relating to the collection, use, retention, and transfer of personal data. Although such laws vary around the world and often change, it is our policy to ensure that any personal data must:

- Be fairly and lawfully processed.
- Be processed for limited purposes.
- Be accurate, adequate, relevant, and not excessive.
- Not be kept for longer than is necessary.
- Be used only for valid business purposes.
- Be processed in accordance with individuals' rights.
- Be held securely at all times.
- Not be transferred without adequate protection.
- Stored and used in-line with any local legislation.

Where we hold personal financial information of employees or customers, such as credit card details, these must be handled securely in line with local legislation and where possible using a third party that is an expert in managing such information.

Additional care needs to be taken where personal data is classified as sensitive. Sensitive data includes information about an individual's health, race, religion, political views, criminal convictions, or sexual practices. We can only disclose such information where the individual has given his or her valid consent, or where there is a legal obligation that we do so – e.g., an accident report.

We owe it to the people with whom we work and deal to keep their personal information secure. Failure to comply with data protection laws can also result in civil, criminal, and financial sanctions for Rentokil Initial and individuals.

### ALL COLLEAGUES ARE EXPECTED TO:

- Only use personal data for clear business reasons in accordance with relevant legislation and the above principles.
- Store personal data securely.
- Immediately report to the Group Data Protection & Legal Compliance Officer any data breaches of which they become aware.

**For further information and advice and to report concerns**

#### READ

Please refer to the **Data Protection Policy** under **Core Group Policies on the RI Intranet**. The **Data Protection** material in the **Group Legal** section of the **RI Intranet** also provides useful guidance.

#### SPEAK

You can speak to your manager, your local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential **Speak Up** reporting system or any other method described on page 29.

### Q&A

**Q: For how long should I keep a job applicant's details on file?**

**A:** 12 months should be sufficient, unless a longer period is required under local law. You can also refer to the Document and Data Retention Policy, under Group Legal, Data Privacy Guidance on the RI Intranet.





CODE OF CONDUCT

# DOING BUSINESS ETHICALLY



# Bribery and Corruption

**We have a zero-tolerance approach to bribery and corruption.**

Bribery, a form of corruption, is harmful and illegal, and we must not engage in it in any way. Bribery means giving, offering, receiving, or requesting a corrupt or improper payment or advantage in exchange for something in return.

### Examples of situations in which pressure to pay a bribe might arise:

- To win or keep a contract.
- To obtain a certificate or permit.
- To secure payment of an invoice.
- To avoid a fine or penalty.
- To clear goods through customs.
- To gain an advantage over a competitor.

A bribe could consist of something of value such as money, gifts, entertainment, services, employment, charitable donations, political contributions, preferable treatment, or some other advantage. Small extra payments to individuals for the performance of routine government or official actions (also known as “facilitation” or “grease” payments) are a type of bribery and therefore equally prohibited. There may be very rare exceptions, usually in an emergency, where such payments are required such as if a colleague’s safety is threatened. Seek advice before considering making such a payment.

Meals, hospitality, and small gifts can be legitimate activities when conducted appropriately. However, they could be a form of bribery if they are excessive in value, inappropriate in nature, too frequent, or intended to have an improper influence on a business decision. All such activities must be carried out in accordance with the Gifts and Hospitality Policy and Travel and Expenses Policy for the relevant business.

If a third party who is acting for us, such as a supplier or agent, pays a bribe then we could be held liable as if we paid it ourselves. We do not want contracts with customers who seek bribes as that kind of business is unethical, illegal, and unsustainable. We must therefore avoid working with people or organisations which engage in corrupt practices.

Any association with bribery, wherever it happens in the world, would be likely to cause severe damage to our reputation and could have serious legal and financial repercussions. For our staff, bribery constitutes serious misconduct which would result in disciplinary actions, up to and including dismissal, and possible criminal proceedings.

### ALL COLLEAGUES ARE EXPECTED TO:

- Stay up-to-date with training on this topic.
- Never give, offer, accept or request a bribe in any form, directly or indirectly.
- Be particularly careful when dealing with any kind of government or public official, and do not offer them anything of value without clear approval to do so.
- Only give or accept appropriate gifts and entertainment in line with the relevant Gifts and Hospitality Policy, and ensure that they are recorded.
- Carry out appropriate checks on our suppliers, ensure they are aware of and agree to comply with our Supplier Code of Conduct and Anti-Bribery & Corruption Policy, and enter into written contracts with them that contain anti-bribery obligations.
- If unsure whether anything may constitute a bribe, err on the side of caution and seek advice.

### For further information and advice and to report concerns

#### READ

Please refer to the Anti-Bribery & Corruption Policy on [www.rentokil-initial.com](http://www.rentokil-initial.com) and Group Legal guidance on the RI Intranet, as well as the Gifts and Hospitality section on page 26.

#### SPEAK

You can speak to your manager, your local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.

### Q&A

**Q:** I’ve been asked to pay a rebate to a customer to secure the renewal of a large contract. This is not referred to anywhere in the contract terms, but it’s a very valuable contract for a key customer. What should I do?

**A:** Do not pay it and seek advice. This sounds like an illegitimate payment request.



# Trade Controls and Sanctions

**We are committed to operating in compliance with all applicable trade controls and economic sanctions laws and regulations.**

Trade controls and sanctions may prohibit some or all business activities within certain countries and/or with specific individuals or entities. Violation of these controls can have serious consequences, including significant fines and/or imprisonment.

To ensure we abide by applicable controls and sanctions requirements, we have a policy and guidance to assist our colleagues in understanding the specific requirements relating to their business and functional activities.

### Examples of activities that could result in non-compliance findings:

- Providing goods or services to, or doing business with individuals, entities, or countries that are subject to sanctions, including Merger & Acquisition activities.
- Engaging in or facilitating transactions or business activities that involve individuals, entities, or countries that are subject to sanctions.
- Making payment to or receiving payments from individuals, entities, or countries that are subject to sanctions.
- Engaging in any activity that could contribute to the evasion of sanctions.
- Providing false or misleading information to relevant authorities in relation to sanctions compliance.

We are committed to conducting our business in an ethical and legal manner, and complying with all applicable trade and sanctions laws and regulations is a key part of this commitment. By doing so, we honour our vision to be the most loved and respected services business on the planet – delivering in THE RIGHT WAY.

### ALL COLLEAGUES ARE EXPECTED TO:

- Understand and comply with applicable laws and policies related to trade controls and sanctions.
- Always record international transactions accurately and completely.
- Recognise that the laws of more than one country may apply to a particular transaction.
- Contact your local legal team if you have one or Group Legal if you ever have questions about a particular transaction.

### For further information and advice and to report concerns

#### READ

Please refer to the **Sanctions Policy** and accompanying guidance on the intranet, under **Group Legal, Legal Compliance**.

#### SPEAK

You can speak to your manager, your local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential **Speak Up** reporting system or any other method described on page 29.

### Q&A

**Q:** We've found that a potential customer is on a sanctions list in another country, but they aren't sanctioned in the country providing the services. Is it okay for us to pursue a business relationship and contract with them?

**A:** Probably not. Several sanctions regimes restrict dealings related to certain persons and entities, so even if they are located in countries other than the sanctioned jurisdiction, the sanctions can still apply. If you don't find the answer you need from the policy and related guidance, contact Group Legal for help.

# Competition and Antitrust

**We must compete fairly and lawfully wherever we operate.**

It is critical to our success that we compete for and win business from customers. However, Rentokil Initial expects all of its businesses to compete in the marketplace in a manner that is lawful, ethical, and allows for healthy competition. Most countries have laws prohibiting anti-competitive behaviour and regulate dealings between competitors, customers, suppliers, and distributors. Generally, this means we cannot engage in behaviour that might restrict competition and/or distort the market, such as price fixing, market sharing, sharing of confidential/sensitive information, and bid rigging with competitors.

If your business is a market leader or has a high market share, it could be treated as having a dominant market position in which case even stricter provisions would likely apply to prevent your business from abusing its position, like aggressively seeking to drive competitors out of business.

These laws vary around the world and some, such as in the US and EU, can apply even when the conduct occurs outside the relevant territory. Penalties for breaching competition law can be severe and could expose Rentokil Initial, and even individuals, to:

- Significant civil and criminal sanctions, including huge fines and prison sentences.
- Investigations and legal proceedings.
- Reputational damage and loss of business.

### ALL COLLEAGUES ARE EXPECTED TO:

- Stay up-to-date with training on this topic and familiarise themselves with applicable laws in their market. If in doubt, seek advice.
- Compete rigorously but fairly, on the basis of the quality and other merits of our services and products.
- Treat all customers fairly on price, terms, and services we offer them.
- Ensure any meetings held with competitors are for a lawful purpose, such as trade association meetings to discuss legitimate issues affecting the industry as a whole.
- Follow the Trade Association Policy should they wish to attend trade association meetings.
- Leave any meetings or end conversations that raise any anti-competitive issues and immediately inform their manager or legal team/Group Legal.
- If our business is dominant in its market, ensure it does nothing that could be construed as abusing its dominant position or unfairly trying to reduce competition.
- Ensure they do not share any commercially-sensitive information with competitors.
- Gather market intelligence through legitimate means.
- Seek advice before collaborating with a competitor (including as their customer or supplier) and ensure any information exchanged is strictly limited to what is required for that particular transaction.
- Take care in any communications, especially in writing, regarding market shares and any other sensitive information. Inaccurate statements of our market share could be used against us if we were ever investigated.
- Never engage in any contact with competitors where prices, costs, margins, commercial contract terms, markets, or customers are discussed.
- Never agree with competitors, directly or indirectly, to fix prices or other contract terms or to divide up markets, territories, or customers.

### For further information and advice and to report concerns

#### READ

Please refer to the Rentokil Initial Competition Law Policy and the Rentokil Initial Trade Association Policy under Core Group Policies on the RI Intranet.

#### SPEAK

You can speak to your manager, your local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.

### Q&A

**Q: A competitor suggests that we coordinate responses to two tenders so we each stand a good chance of winning one. Is this the 'win-win' situation he suggests?**

**A:** No this would be illegal bid rigging. We must decide our responses to all tenders independently.



# Accurate Reporting, Accounts and Records

**It is essential we record and report all information accurately and honestly.**

All colleagues must ensure accurate and honest recording and reporting of information in order to conform both to applicable legal requirements and to the company's system of internal controls. This applies to all information relevant to our business, including our annual report, monthly management accounts, sales figures, contracts, and personal expenses claims, as well as non-financial information such as health and safety reports and supplier audits.

Our financial and accounting records are relied upon by our management, directors, investors, and the public to make informed decisions about our business and may also be provided to regulatory and governmental authorities. We must comply with all applicable laws, regulations, accounting standards, and our own accounting policies, and ensure the financial information we produce provides a true and fair view of our business and is not in any way misleading. Revenue and profit figures must be accurate and recognised in the correct period in line with the requirements of applicable accounting standards. Any material areas of judgement or subjectivity must be agreed upon with Group Accounting.

All sales and customer contracts must be appropriately documented and correctly recorded in the relevant contract-administration system. All business expenses must be accurately recorded and supported by documentation. If a colleague is not sure if an expense is legitimate, they should refer it to their manager.

### ALL COLLEAGUES ARE EXPECTED TO:

- Ensure all our books, records, data, and accounts are accurate and complete.
- Never artificially inflate sales or profit figures, or falsely move them between reporting periods.
- Never make any false or misleading entry into any report, record, or expense claim.
- Be vigilant for any fraud or misreporting and immediately report any concerns.
- Never create or use any undisclosed, 'off the books' or 'ghost' accounts, contracts or funds.
- Record and document all transactions appropriately.
- Follow all applicable Rentokil Initial accounting policies and procedures and comply with all relevant laws, regulations, and standards.
- Ensure all control procedures are rigorously applied and fully documented in line with our documented Internal Control Framework.

### Q&As

**Q: I've noticed that Sales seems to invoice additional sales at the end of each quarter, some of which is re-credited at the beginning of the following quarter. What should I do?**

**A:** If you are concerned, you should raise the issue with your manager or finance team.

**Q: My manager has asked me to pay for a dinner with customers which both of us attended and to claim it back through expenses. What should I do?**

**A:** The most senior colleague present should pay for meals or entertainment and should have it authorised by their line manager. It is not acceptable to ask junior colleagues to pay for expenses where the purpose of doing so is to circumvent obtaining appropriate approval.

**Q: My sales manager says he's agreed to a big sale with a customer which should be included in this year's figure, but the "paperwork" won't be signed until January. Can I include it?**

**A:** The contract needs to be finalised and signed before the revenue can be booked, so you should not include it unless that can all be in place by the end of the year.

**For further information and advice and to report concerns**

#### READ

Please refer to the Group Accounting policies in the Central Finance section of the Group Intranet.

#### SPEAK

You can speak to your Finance team.

#### REPORT

You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.





CODE OF CONDUCT

# RESPECTING THE WORLD IN WHICH WE WORK



## Environment

**We seek to minimise our impact on the environment and all colleagues have a role to play in protecting the environment.**

Emissions and pollution to air, ground, and water, as well as odour and noise, can create problems for the company's neighbours and the wider environment. Sound waste management and careful use of material resources and energy are both environmentally and economically sensible.

The company will strive to use material resources in an effective way. We will minimise the use of energy and emissions to air, ground, and water. We will also minimise the creation of waste and manage unavoidable waste in an environmentally considerate manner wherever possible. The company will comply with all environmental laws and regulations. It will also publicly report, at least annually, its achievement against key performance indicators, such as energy usage and CO<sub>2</sub> emissions. The company will strive when developing and using materials and products, to identify methods and materials that reduce our impact on the environment. We will also strive to reduce our consumption of scarce resources and will seek to use sustainable resources whenever and wherever possible.

All colleagues must comply with applicable laws and regulations and respect the environment in all work-related activities, whether or not on the company's property.

### ALL COLLEAGUES ARE EXPECTED TO:

- Conduct their work in a way that complies with environmental laws and regulations and minimises any significant adverse effect on the environment.
- Report the matter immediately on becoming aware of, or suspecting, a violation of environmental laws or the company's principles relating to environmental matters.
- Understand and comply with all relevant permits, regulations, policies, and guidance if their job involves supervising or handling regulated and/or hazardous materials.

### For further information and advice and to report concerns

#### READ

Please refer to the **Environment Policy, the Health and Safety Policy under Core Group Policies on the RI Intranet, and the company's Responsible Business Report on [www.rentokil-initial.com](http://www.rentokil-initial.com) for further information. Further guidance can also be found in the SHE section of the RI Intranet.**

#### SPEAK

You can speak to your manager, local SHE team, local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential **Speak Up** reporting system or any other method described on page 29.

### Q&A

**Q: Some chemicals have been accidentally spilt in the course of our work. What should I do?**

**A:** Ensure that you and any colleagues/others nearby are safe and then immediately report the incident to your line manager and follow the procedures your business has in place to deal with the spillage. If the incident counts as a major incident (e.g. hazardous chemicals are discharged into a watercourse), the Group Major Incident Reporting procedure should be followed. In any case, the incident should be investigated, and steps taken to prevent reoccurrence.



# Community, Charitable and Political Activity

### We respect our local communities.

We understand we have a responsibility to play a positive role in our local communities. Rentokil Initial assists where possible the involvement of colleagues in the cultural, educational, and social development of the communities in which the company operates and its employees live.

As an organisation, we make corporate donations and raise funds for various charitable causes. It is important that any charitable contributions on behalf of the company are properly authorised and should not be used to gain improper advantage. The company encourages personal charitable giving, particularly where its employees take an active role, and has a matched-giving scheme to support colleagues' efforts.

As a non-political organisation, Rentokil Initial will refrain from making any contribution, whether in cash or kind, to any political candidate, party, or organisation whose activities are designed to promote the interests of political parties or political ideologies. The company and all of its colleagues are part of society wherever it operates and in all societies, matters relating to politics play an important role for both businesses and individuals. From time to time political subjects of legitimate interest and importance to the company may arise. Only properly authorised personnel may engage in any communication that might be considered as participating in the political process (including political lobbying). See page 23.

Colleagues, in their personal capacity, are free to participate in any community, charitable, trade union, or political activity of their choice on an individual basis, with their own money and in their own time, but this must not interfere with their work for the company, create a conflict of interest, or bring the company into disrepute. Colleagues should be careful to ensure any such activity could not be interpreted as being on behalf of, or connected with, our business (unless it is previously authorised).

### ALL COLLEAGUES ARE EXPECTED TO:

- Respect the communities in which we operate and be sensitive to culture and customs.
- Obtain any necessary approvals, in accordance with the Group Authority Schedule, prior to agreeing to make any charitable donations on behalf of Rentokil Initial.
- Never make any charitable contributions that are, or could be construed as, for the purposes of seeking a business or personal advantage or influence.
- Never make any political donations or engage in any political process on behalf of Rentokil Initial without prior approval, in accordance with the Group Authority Schedule.
- Keep personal, political, and charitable activities separate from work activities.

### For further information and advice and to report concerns

#### READ

Please refer to the **Community Involvement Policy** on [www.rentokil-initial.com](http://www.rentokil-initial.com) and see the **Rentokil Initial Cares** section on the RI Intranet.

#### SPEAK

You can speak to your manager or the **Corporate Communications team**.

#### REPORT

You can report any concerns using our **confidential Speak Up reporting system** or any other method described on page 29.

### Q&A

**Q: A customer has requested that we provide financial support to a local charity and has suggested that if we don't we may lose business. What should I do?**

**A:** You should raise the matter with your Managing Director. It is not acceptable for such support to be provided to avoid losing business as this would be a bribe.



CODE OF CONDUCT

# PROTECTING OUR ORGANISATION

## Contracts

**The business contracts we enter into must be authorised and observed properly.**

Contracts define our business relationships with customers, suppliers, and other third parties with whom we do business. They are an important means of managing risks by setting out each party's obligations, providing clarity as to how the relationship should work and limiting our exposure if things go wrong. It is also critical we fully observe all of our duties and obligations contained in those contracts to preserve the company's commercial success and maintain its reputation.

For customer contracts, we have a Customer Contracts Minimum Standards Policy that sets out details of the minimum standard requirements in our contracts, as well as commentary on our standard contracting clauses. It is designed to help guide contract negotiators on internal policy regarding what can and cannot be amended by negotiation, and explanations of the purpose and importance of clauses. It should be read with the Group Authority Schedule on financial and other key risk clauses (e.g., unlimited liability) and the escalation process to get approvals for exceptions to the standard arrangements.

There is a separate Group Procurement Policy which must be followed for all dealings with suppliers of products or services, along with the Supplier Code, which aligns the standards expected of our suppliers with those set out in this Code.

### ALL COLLEAGUES ARE EXPECTED TO:

- Follow the Customer Contracts Minimum Standards Policy when negotiating and entering customer contracts.
- Observe the Rentokil Initial Procurement Policy and Supplier Code for supplier contracts.
- Follow the Group Authority Schedule.
- Ensure all agreed terms are properly documented in writing.
- Not agree to carry out any unauthorised business activity or provide services in a territory outside our footprint without the appropriate Group approval.
- Ensure that contracts and their terms are reviewed and approved at the appropriate level, in accordance with the Group Authority Schedule.
- Familiarise themselves with, and observe, the terms of any contracts applicable to our activities.

**For further information and advice and to report concerns**

#### READ

Please refer to the **Customer Contracts Minimum Standards Policy, Group Procurement Policy, Supplier Code, and the Group Authority Schedule on the RI Intranet.**

#### SPEAK

**You can speak to your manager, your local legal team if you have one, or Group Legal.**

#### REPORT

**You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.**

### Q&A

**Q: A key customer asked me if we can sort out some repairs to their roof, which I noticed needed doing. This is not what we normally do but we can find someone who could, which would keep the customer happy and avoid them going to a competitor. Is this ok?**

**A:** We must not carry out unauthorised activities without specific authorisation from Group. There are several reasons for this, including SHE risks, whether we would be insured, whether we have the appropriate license, and the damage it could cause to the customer and our reputation if something went wrong.



# Company Assets and Confidential Information

**Colleagues must protect and not misuse company property and confidential information.**

All company assets, whether physical or intangible, must only be used for legitimate and authorised business purposes. Theft, misuse, and carelessness have a direct impact on the company's profitability.

## Physical Property and IT Resources

Rentokil Initial provides tools, products, and equipment for carrying out our work which should never be used for personal use or profit. The company also gives access to IT resources, such as PCs, laptops, handheld devices, mobile phones, email, and the internet for business purposes. Limited and occasional personal use of company IT resources is permitted, provided it does not interfere with colleague productivity or performance of his or her duties, or adversely impact the reputation of the company. At all times, the use of the company's IT resources must comply with the company's Acceptable Use Policy. Suspected misuse of company equipment, systems, or data will be investigated and could result in disciplinary action being taken, which may include dismissal.

## Intellectual Property and Confidential Information

The obligation of all colleagues to protect the company's assets includes its intellectual property, such as trade secrets, patents, trademarks, and copyright material, including customer lists and operating manuals as well as other business and marketing material, ideas, designs, databases, records, or any unpublished financial data and reports. A considerable proportion of the value of the group is represented by intellectual property rights and all colleagues have a responsibility to protect these important assets.

Colleagues must not use the company's confidential information in an inappropriate manner, either for personal gain or to provide an unfair advantage to a third party. All non-public information about the company is confidential information and should be kept secure and not be discussed with or disclosed in any way to any external parties. This confidential information includes details of customers and suppliers, the way the company operates its services, and how the company's products are manufactured or purchased.

In the case of required disclosure of information to third parties, such as advisers and business partners, there must be contractual arrangements in place containing clear rules on the non-disclosure of information.

### ALL COLLEAGUES ARE EXPECTED TO:

- Be vigilant for any misuse or theft of company resources and report any concerns.
- Avoid improper use of company assets, such as using work phones for excessive personal calls.
- Ensure leavers return all company property in their possession before they leave, including customer lists and operating manuals.
- Follow all best practices and policies for IT security and stay up-to-date with training on the subject.
- Be discreet when discussing or working on confidential matters.
- Enter an appropriate confidentiality agreement (also known as a non-disclosure agreement or NDA) before making confidential information available to third parties.

**For further information and advice and to report concerns**

#### READ

Please refer to the **Acceptable Use and Information Security** policies on the RI Intranet.

#### SPEAK

You can speak to your **manager, your local legal team if you have one, or Group Legal.**

#### REPORT

You can report any concerns using our confidential **Speak Up** reporting system or any other method described on page 29.

### Q&A

**Q: One of my team members left to join a competitor and I'm worried he took details of our customers with him. What can I do?**

**A:** Report your suspicions to your Manager and/or Local HR, your local legal team if you have one or Group Legal. We can investigate and if necessary follow up with him and his new employer. We may take legal action for breach of confidentiality and breach of his employment contract terms. In some circumstances we may need to inform regulators or customers.

**Q: What obligations apply to other companies' information that we come across?**

**A:** We must apply similar standards of protection to the confidential information of third parties as we should to our own.

# Fraud and Money Laundering

**We all have a role to play in preventing fraud and money laundering.**

Rentokil Initial is committed to preventing fraud and to maintaining an appropriate anti-fraud culture, which is why the company has a zero-tolerance approach to fraud. Fraud can potentially seriously damage the company's reputation, as well as expose individuals and the company to legal proceedings. No colleague should knowingly permit the carrying out of any fraudulent act by a business or another colleague in connection with the running of a Rentokil Initial business.

Any conduct that could potentially be fraudulent will result in an investigation that could lead to disciplinary action being taken against the offending party, which may result in dismissal. Any concerns should be reported promptly to your manager or by using any of the ways set out in the Advice and Reporting Concerns section on page 29.

### Examples and potential indicators of fraud:

- Setting up false records of sales or contracts.
- Excessive use of write offs or credit notes.
- 'Moonlighting' or secretly conducting Rentokil Initial services for personal payment.
- Request for changes to supplier or colleague bank account information.
- Forgeries or unauthorised alteration of documents.
- Payment or receipt of unusually high or low prices.
- Payments made for unclear reasons.
- Fictitious expenses.

Any incidents or suspicions of fraud committed against Rentokil Initial by external parties should be reported to your finance or legal team. Do not request or authorise any payments where you suspect fraud could be involved.

All colleagues must guard against money laundering: money laundering is the process whereby criminals attempt to hide or disguise the true origin and ownership of the proceeds of their criminal activities, thereby avoiding prosecution, conviction, and confiscation of the criminal funds. 'Tipping off' anyone who may be attempting to commit a crime under the money laundering rules can also be a criminal offence. Money laundering crimes can result in a colleague personally being subject to criminal sanctions and company disciplinary measures. Circumstances that may indicate money laundering include a customer or other party being unwilling to provide personal information, wishing to pay large amounts in cash, being unconcerned about the amount they need to pay, using multiple accounts or payment methods, or using an account based in an unexpected location.

### ALL COLLEAGUES ARE EXPECTED TO:

- Immediately report any potential fraud or other dishonest activity they become aware of or have suspicions about.
- Be cooperative, open and honest in any fraud investigation.
- Be alert to the possibility of fraud being committed within Rentokil Initial or by external parties and act on any suspicions. If something does not seem right then seek advice.
- Follow all best practice and advice issued in relation to preventing fraud attempts such as phishing emails.
- Be alert to circumstances or behaviour which could suggest money laundering and discuss any concerns with their finance team or Group Treasury.

**For further information and advice and to report concerns**

#### READ

Please refer to the **Bribery and Corruption Section on page 12 and Accurate Reporting, Accounts and Records on page 15.**

#### SPEAK

You can speak to your manager, finance team, internal audit, your local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential **Speak Up reporting system** or any other method described on page 29.

### Q&A

**Q: I suspect a colleague might be involved in fraudulent behaviour. I want to report it, but I also want to avoid any personal repercussions. What should I do?**

**A:** There are a number of ways you can report this. You could speak to your manager or another senior colleague, contact your local legal team (if any) or Group Legal, inform the Internal Audit team or raise the issue by email or telephone through our anonymous reporting service **Speak Up** – see page 29 for further details. We will not tolerate any retaliation against people who, in good faith, report suspected ethical or legal misconduct or policy violations.

## External Communications

### Only authorised personnel should speak or write on behalf of Rentokil Initial.

As a large organisation, Rentokil Initial often attracts the attention of the media and other interested third parties. However, as a publicly listed company we must ensure that price sensitive information is released to the stock market before being released to any other party. It is also important to protect our reputation by being consistent and accurate and not misleading in our communications to the public and other stakeholders. The company therefore takes disclosure and communication of information very seriously. Only those employees specifically authorised to do so may contact or respond to enquiries from the media, the public, or governmental bodies, or may release an announcement or statement on behalf of the company to the press or any stock exchange.

Any information relating to financial performance, acquisitions or divestments, joint ventures, investments, or major new contracts or contract losses that has not already been communicated publicly, must first be approved by the corporate communications department before public disclosure. Statements about Rentokil Initial's financial performance may only be made by properly authorised officers of the company. Equally, only those colleagues specifically authorised to do so may contact or respond to enquiries from the investment community (shareholders, brokers, investment analysts, etc).

Colleagues must obtain authorisation before speaking at an event, giving an interview, or writing material for publication in their capacity as a Rentokil Initial employee. This authorisation may be provided by a member of the country's leadership team. This excludes business as usual Marketing, Social Media, and PR activities which have their own dedicated approval channels. With anything corporate in nature, please contact Group Communications for authorisation and support.

### Social Media

Social media activities include, but are not limited to, using or participating in social or professional networking sites, such as Facebook and LinkedIn, posting or reviewing content on photo or video-sharing sites, such as YouTube, Reddit, TikTok or Instagram, creating "wikis" and authoring or commenting on blogs, such as X (formerly known as Twitter).

When using social media, it is important colleagues are careful with communications that may impact the company or our colleagues, whether speaking on behalf of the company or in private communications, i.e., being mindful of anti-harassment and bullying policies, confidentiality of company, colleague, and customer information, etc.

Colleagues should not carry out any political lobbying on behalf of the company without authorisation from the CEO.

### ALL COLLEAGUES ARE EXPECTED TO:

- Refer any inquiries from the media, investment community, regulatory body, government, customer, or the public to an authorised employee to manage, unless authorised to speak to them.
- Adhere to Company policies, as well as other work rules, procedures, and protocols that govern the colleague's behaviour with respect to electronic communications, use of company property, and confidentiality obligations.
- Obey the law. Respect intellectual property rights, privacy, libel, defamation, employment discrimination, financial disclosure, and other laws.
- Obtain proper authorisation, as outlined above, before speaking at an event or issuing any publication on behalf of Rentokil Initial.

### For further information and advice and to report concerns

#### READ

Please refer to the Corporate Communications section on the RI Intranet, as well as any related policy your region may observe regarding the use of Social Media or Professional Networking, and the Disclosure Policy under Core Group Policies on the RI Intranet.

#### SPEAK

You can speak to your manager, Corporate Communications team, or the Company Secretary.

#### REPORT

You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.

### Q&A

**Q: A friend asks if he should buy Rentokil Initial shares, what can I say?**

**A:** You can tell him/her what a great company you work for but should not mention any non-public information you have about our plans or future prospects. You could refer them to our website where there is plenty of information for potential investors. You should also consider our Share Dealing and Inside Information policy and seek advice from the Company Secretary if you are unsure.





CODE OF CONDUCT

# MAINTAINING PERSONAL INTEGRITY

## Conflicts of Interest

**Colleagues must not allow any conflicts to arise between their interests and those of Rentokil Initial.**

All colleagues should act in the best interests of Rentokil Initial at all times and ensure that they can perform their work effectively and exercise objective judgement. Colleagues should be, and be seen to be, loyal in all matters affecting the company, including matters relating to customers and others with whom the company has a commercial relationship.

A conflict of interest exists when a colleague's own interests or external relationships interfere or compete with the interests of the business or influence their ability to make the right decisions. Please ensure you comply with the requirements of the Conflict of Interest Policy, including in relation to:

- Secondary employment and
- The requirement to disclose close personal relationships with colleagues, competitors, customers, and/or suppliers.

### Examples of prohibited potential conflicts of interest:

- Starting, being involved in, and/or operating a business that provides services similar to that of the company.
- Working for, or owning an interest in, a competitor, customer, or supplier.
- Using company information, products, or equipment for personal gain or to benefit friends and family.
- Engaging in political or charitable activities that interfere with duties to the company.
- Not disclosing a close personal relationship you have with a colleague, competitor, customer, or supplier.
- Choosing to use a particular supplier because of the hospitality they provide.

Many actual or potential conflicts can be resolved in a satisfactory way for both the colleague and business, but this depends on all relevant details being fully disclosed and discussed in an open and transparent way. A conflict of interest isn't necessarily a Code violation, but failure to properly report one is.

### ALL COLLEAGUES ARE EXPECTED TO:

- Think about and avoid situations where personal interests may conflict with their duty to Rentokil Initial.
- Bring an actual or potential conflict of interest to the attention of their line manager immediately. Any agreed actions should be confirmed in writing and retained with the colleague's personnel documents.
- Declare any outside business interests that could affect, or distract from, duties to the company.
- Disclose to their line manager or HR if they are in or have been in a close personal relationship with another colleague. Colleagues should **never** have responsibility or take part in discussions on any decisions about a person they are in, or have been in, a close personal relationship with, including but not limited to contract terms or award of business, compensation/payment, job role or responsibilities, promotion opportunities, and/or disciplinary action processes.
- Never allow themselves to be in a situation where they are solely responsible for the giving of business or employment to a relative or friend or someone with whom they are in a close personal relationship. Colleagues must disclose their relationship and stay out of the process.

**For further information and advice and to report concerns**

#### READ

Please refer to the Group Legal – Legal Compliance page on the Group Intranet for the Conflict of Interest Policy.

#### SPEAK

You can speak to your manager, your local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.

### Q&A

**Q: My spouse has started work at one of our key suppliers. What should I do?**

**A:** Disclose the fact to your manager. It may well create no problem at all, depending what roles you and your spouse have. You should make sure that you don't get involved in any decisions relating to our use of that supplier.

# Gifts and Hospitality

**Gifts and hospitality received and given must be reasonable, legitimate, and authorised.**

The offering or accepting of reasonable gifts and hospitality can have a positive and legitimate role to play in building relationships with business partners. It is generally acceptable if it is reasonable in the circumstances to do so, and is proportionate and not lavish or extravagant. However, gifts and hospitality must not be used to gain any improper advantage or in a way that might create a conflict of interest, lead to a sense of obligation, or affect judgement on the part of the recipient. Gifts and hospitality must not influence any business decisions, or cause others to perceive such an influence.

Each Rentokil Initial business must maintain and implement a gifts and hospitality policy that puts in place sufficient guidance and limits on the giving or acceptance of all gifts and hospitality. These limits should be set to ensure gifts and hospitality are in keeping with local practices and laws, including anti-bribery laws.

### ALL COLLEAGUES ARE EXPECTED TO:

- Comply with the applicable Gifts and Hospitality Policy or Travel and Expenses Policy, including with respect to the value, frequency, and recording of gifts and hospitality.
- Seek advice from their line manager before gifts or hospitality are offered or accepted if there is any case of doubt.
- Observe any applicable policies of customers, suppliers, and other third parties in this area.

### And not to:

- Give, promise to give, or offer a gift or hospitality with the expectation, intention, or hope that a business advantage will be received, such as the award of a new contract, or the retention of an existing one, or to reward a business advantage already given.
- Accept a gift or hospitality from a third-party if it is known or suspected that it is offered or provided with an expectation it will obtain a business advantage or could result in the colleague not acting objectively or effectively.
- Ask Rentokil Initial partners (including suppliers, business partners, joint venture partners, subcontractors, or advisors) to contribute towards the cost of entertaining customers on behalf of Rentokil Initial.
- Receive cash, or a cash equivalent (such as gift certificates, lottery tickets, or vouchers).
- Attempt to conceal or disguise gifts or hospitality given or received.
- Give to or accept gifts or hospitality from government officials or representatives, or politicians or political parties, without the prior approval of their line manager.

**For further information and advice and to report concerns**

#### READ

Please refer to the **Gifts and Hospitality and Travel and Expenses Policies** for your business.

#### SPEAK

You can speak to your manager, your local legal team if you have one, or Group Legal.

#### REPORT

You can report any concerns using our confidential **Speak Up** reporting system or any other method described on page 29.

### Q&A

**Q: I've been invited to a major football match with a contact, can I go?**

**A:** You need to consider whether your relationship with this person means they could expect a favour from Rentokil Initial in return, and what the value of the ticket and hospitality is. If you decide to go, you should record the entertainment in your local Gifts and Hospitality register.



## Insider Trading

**We must not use inside information or material non-public information for personal financial benefit.**

Colleagues must not use non-public, price-sensitive information for personal financial benefit, or to 'tip off' others who might make an investment decision on the basis of that information. This is both unethical and illegal, and could result in criminal proceedings, fines, imprisonment, and losing your job.

From time to time, some colleagues will become 'insiders' because they become aware of confidential information that could affect the price of the company's shares (perhaps because they are involved in a special project or are involved in preparing financial information for release to the market). Special rules apply to people in this position, which will be explained to the respective people at the appropriate time.

Rentokil Initial colleagues who have, or become aware of, information that might be price sensitive to the company's traded shares must ensure such information is kept confidential and not disclosed to any other colleague, or to third parties, other than on a strict need-to-know basis pre-approved by the Disclosure Committee. Potentially price-sensitive information received inadvertently or unexpectedly should be brought to the attention of the Disclosure Committee by contacting the Company Secretary.

### ALL COLLEAGUES ARE EXPECTED TO:

- Never buy or sell shares in Rentokil Initial (or otherwise deal in the company's securities) while in possession of inside information or material non-public information about the Group, or while they have been notified they are restricted from trading during a closed period.
- Avoid passing on inside information to others, such as relatives or friends.
- Comply with the Group-Wide Share Dealing Policy.

**For further information and advice and to report concerns**

#### READ

Please refer to the Share Dealing and Inside Information section of the RI Intranet, located on the Group Legal page.

#### SPEAK

You can speak to your manager or the Company Secretary.

#### REPORT

You can report any concerns using our confidential Speak Up reporting system or any other method described on page 29.

### Q&A

**Q: I overheard a colleague talking about an imminent acquisition. Does this mean I cannot trade in the company's shares?**

**A:** Yes. You may be in possession of confidential information, which may be deemed to be inside information or material non-public information and you should not trade without seeking approval from the Company Secretary. The individual who was overheard should have been more careful and should not have been talking of confidential matters within earshot of other colleagues.



CODE OF CONDUCT

# GENERAL GUIDANCE

# Resolving Ethical Dilemmas

Ethical behaviour and decision making extends beyond legal requirements and as such requires colleagues to exercise judgement and accept personal responsibility. Colleagues are encouraged to seek help or engage others in dialogue and debate to identify the best course of action. When faced with an ethical dilemma, begin by asking yourself the following questions

- Do my intended actions comply with relevant laws and regulations?
- Do my intended actions reflect the company's values?
- Do my intended actions follow the ethical principles in this Code of Conduct?
- If reported in the newspaper, would my intended actions be viewed positively?
- Would I be happy if my intended actions were done to me or a loved one?
- Would I and those I respect be proud of my intended actions both now and in the future?
- Does it feel right?

If you answer 'not sure' or 'no' to any of these questions, report or discuss your concerns with your line manager, your local HR manager, Group Legal or via Speak Up.

## SEEKING ADVICE AND REPORTING CONCERNS

There is always someone who can help any colleague when assistance is required with ethical concerns. Your concerns will be taken seriously and addressed in a thorough and professional manner. When potential misconduct is reported, we will investigate and take appropriate action.

Colleagues can use the following resources for help, information or guidance about an ethics matter, or to report a suspected incident.

### Contact your manager

In most cases your manager is the best person to speak with. If you are unsure about the most appropriate course of action to take in any situation, you can ask your manager for advice.

### Speak to your next level manager

In special cases where you feel that it is inappropriate to consult your direct manager, you can consult your manager's manager for advice or to report concerns.

### Inform your local human resources team

Your local human resources team is available to discuss any ethical matters or dilemmas you might have, as well as concerns involving employment matters.

### Contact Group Legal

Group Legal is experienced in handling a wide range of ethical and legal matters. You can contact any member of the Group Legal team individually or use the following email address: [group-legal@rentokil-intial.com](mailto:group-legal@rentokil-intial.com).

### Speak up

Details of how to use the confidential reporting process can be found in the panel on the right.

## Speak Up

The company operates a confidential reporting process called 'Speak Up', which allows colleagues to raise concerns internally to independent senior management at Rentokil Initial plc. The Speak Up contact details must be available to all colleagues at all locations. Alternatively use one of the following:

### EMAIL

[speak-up@rentokil-initial.com](mailto:speak-up@rentokil-initial.com)

### PHONE

+44 (0)1276 536635

### INTRANET

<https://sites.google.com/a/rentokil-initial.com/internal-audit-new-site/speak-up/>

Rentokil Initial will not tolerate any retaliation in any form against people who, in good faith, report suspected ethical or legal misconduct or policy violations.



Don't forget to login to U+ to keep up to date with all your training.