



Global Social Media Policy

SocialMediaPolicy.pg.com

About this Policy

- Effective:** August 1, 2011
- Last Updated:** August 6, 2020
This policy supersedes and replaces all previous global social media policies.
- Owner:** Tracey Long
Corporate Communications
- Scope:** Global
- Approvers:** Global Brand Building Officer,
Chief Legal Officer,
Chief HR Officer

Your Personal Responsibility

P&G recognizes that new technologies provide unique opportunities to build our business, listen, learn and engage with consumers, stakeholders and employees through the use of a wide variety of Social Media. However, like any exciting new opportunity, how we use Social Media and what we say also has the potential to affect P&G/Brands and/or expose the Company (and each of us) to business or legal risk.

Therefore, every employee has a personal responsibility to be familiar with and comply with P&G's overall Global Social Media Policy. This policy is designed to reflect our Purpose, Values and Principles (PVPs), our Worldwide Business Conduct Manual (WBCM), and legal requirements. Because we use Social Media in a variety of ways, there are more specific expectations that may apply to your activities.

Company Intent

This Global Social Media Policy, last updated June 2020, supersedes and replaces all previous Social Media policies. This policy provides Company expectations for use of Social Media when P&G, our contractors, suppliers and other third parties use it as part of job responsibilities, as an efficient means for business collaboration and productivity, and/or in their personal use – e.g., when we refer to the Company and/or its brands.

Who Is Covered By This Policy

This policy applies to all global employees and members of the Company's Board of Directors in their capacity as representatives of P&G and/or our Brands. The policy also applies to third parties who act on our behalf, including but not limited to our suppliers and agencies. You are responsible for knowing the Company's principles, rules, and best practices before you engage in Social Media.

Principles

This policy complements and reinforces P&G's PVPs and WBCM. The most important step employees should take before engaging in Social Media is to know and follow our PVPs and WBCM. If you become aware of or believe that P&G technologies and/or electronic communications

are being used in violation of P&G policies, for example, for making disrespectful remarks based upon race, religion, age or other legally protected characteristics, or for harassment or bullying, or to make maliciously false statements, notify your immediate manager, HR Manager, Legal, and/or the [WBCM Helpline](#). Employees should make sure they are always honest and accurate when posting information or news and should never post information or rumors they know to be false. We may request that employees change or remove comments made in Social Media that are inconsistent with this policy. We may also request that agencies or vendors change or remove comments made in Social Media that are inconsistent with this policy or that make inaccurate references to the Company, its brands, and/or stakeholders.

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This policy is not intended to interfere with an employee's legally protected rights (e.g., the posting or sharing of information relating to the terms and conditions of employment) or to prohibit communications protected by local law.

Global Social Media Policy



1. Follow PVPs, WBCM and local laws: Our PVPs, our WBCM, and all applicable laws drive our behavior and good judgment in the use of Social Media. Consult and follow the WBCM, including the sections on Promoting Respect in the Workplace, Respecting Third Party Information, Keeping P&G Information Secure, and Using Company Assets and Technologies Properly. Also, review and comply with the Company requirements and laws that apply to your specific purpose for using Social Media. Keep in mind the global scope of Social Media. Local posts, even to a limited audience, can be mistranslated, misunderstood, or illegal in other countries. When you have questions, consult with Legal or other relevant resources.

2. Any comments you make concerning Company or competitive products or business initiatives may be subject to review by regulators. We love when employees share enthusiasm for P&G but whenever you comment on Company or competitive products or business initiatives, no matter how informally, you must identify that you are a P&G employee (i.e., #PGEmployee not #PGEmp). These disclosures are equally important for any agency, vendor, partner, or a similar third party who comments on Company or competitive products or business initiatives (i.e., #ad, #paid, #sponsored, #PGClient). Consult the Global Influencer/Blogger/Vlogger/WOM Guidelines for more information. Similarly, if you create a P&G-sponsored Social Media forum (site, mini-site, chat-group, etc.) clearly indicate that P&G is the sponsor.

3. Use good judgment: Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Employees should make sure they are always honest and accurate when posting information or news and should never post information or rumors they know to be false. Anything you post has the potential to

be viewed by anyone, and – regardless of your intent – your comments could be misinterpreted by consumers, competitors, vendors, customers, other employees, and/or government regulators. Simply because the use of online Social Media can be fast, easy, informal and inexpensive doesn't mean that different rules apply for this space.

(*"Protect Company assets and confidential information:* Be familiar with the [Information Asset Classification](#) of information you possess. For example, do not post financial information or proprietary information about P&G, and/or our Brands, or your projects. Information Security policy generally prohibits posting confidential data on the Internet. None of P&G's policies, however, prohibits the posting or sharing of information relating to the terms and conditions of employment of our employees.

) *"Be responsible in your use of technology:* Electronic messages are permanent, transferable records of your communications. Provide factual, non-confidential information and perspective consistent with the terms of this policy. You should have no expectation of privacy with respect to postings made on public Social Media sites.

****"Protect individual privacy:* Ensure that any collection or use of Personal Data on Social Media complies with the law and our [Company's privacy policies](#). This includes the way that we collect, share, store, provide access to, and/or use that Personal Data.**

+*"Respect third party and employee intellectual property and commercial rights:* You may need to have documented permission to use third-party or employee intellectual property rights, including copyrights, patents, trademarks, photos/videos, right of publicity (i.e., individuals' names and likenesses), and other intangible property. Consult with Legal before using actual materials to ensure the proposed use complies with the permissions, consents, and/or license(s) granted to us.

8. Avoid the appearance of Company-sponsored posts: Do not attempt to post information about P&G and/or our brands that appears to readers to be formally sponsored by P&G (e.g., if your posting looks like an official P&G press statement) unless you have approval from official P&G spokespersons (typically Communications managers) and from Legal. (See Use of Social Media as Part of Your Job Responsibilities.) You can share official brand information the Company has already circulated through viral Social Media tools (with appropriate disclosures, see #2), but do not attempt to create your own official-looking posts.

9. Take responsibility for third parties we engage or you influence: As a P&G employee you have ultimate responsibility for policy compliance by third parties within your job scope (e.g., our suppliers, agencies and others who act on our behalf) and area of influence (i.e., people who may be construed as associated with the Company, such as friends, relatives, family members, etc., whom you incent [i.e., through payment, product, samples, etc.] to speak about the Company and/or its products).

10. Refer to specific sections of this policy for additional standards and procedures designed for how you use Social Media: This document represents the broader Company-wide Global Social Media principles expected to be followed by all employees. However, as with any broader listing of principles, the work and the complexity lie in the details. We have created a series of tiered policies, standards, procedures and best practices to reflect the way(s) in which you use Social Media. You are responsible for knowing the Company's principles, standards, procedures and best practices before you engage in any of these activities.

Use of Social Media as Part of Your Job Responsibilities

The following standards and procedures must be followed by employees and third parties when using Social Media as part of their job responsibilities at or for P&G (e.g., Brand, Media, Communications, Talent Supply, R&D, CMK, Sales, digital agency personnel, etc.). An employee's failure to comply with these standards and procedures when using Social Media as part of their job responsibilities at P&G may result in disciplinary action up to and including termination.

1. Have a documented compliance plan/process: Every P&G-sponsored Social Media web presence (even on third party sites) must have a documented plan, process or capability to ensure compliance on an ongoing basis with this Policy. Depending on the legal risk to the Company, the compliance plan can range from very simple/occasional procedures to more complex/stricter requirements and checks. At a minimum:

- **Have a designated owner:** Every P&G-sponsored Social Media presence must have a designated owner (e.g., community manager, etc.) knowledgeable about their roles and responsibilities.
- **Check with the experts:** Any new type of internal Social Media presence and/or any new external P&G-sponsored site must be reviewed by Information Security and SMO Legal.
- **Review User-Generated Content initiatives with Legal:** Any P&G-sponsored Social Media presence which will allow consumers or external stakeholders to post photos or other User-Generated Content must get prior review from SMO Legal.

2. Follow certain principles when speaking on behalf of the Company: The following high-level principles should guide how our spokespeople represent the Company in an online, official capacity when they are speaking "on behalf of the Company":

- **Remain guided by Company policy, including our PVPs and the WBCM:** In all dialogue, it is critical to do the right thing. Make sure your agency partners understand how we expect them to conduct themselves on our behalf.
- **Protect individual privacy:** Ensure that any collection or use of Personal Data on Social Media complies with the law and our [Company's privacy policies](#). This includes the way that we collect, share, store, provide access to, and/or use that Personal Data.
- **Be accurate and truthful:** As an online spokesperson, you must ensure that your posts are accurate and not deceptive or misleading.
- **Disclose your affiliation with the Company:** We require, and many laws dictate, that persons speaking on behalf of the Company clearly and conspicuously disclose their affiliation with the Company in their posts, blogs, etc. We require bloggers and word-of-mouth participants that we sponsor – e.g., by providing them with incentives (e.g., cash, coupons, samples, etc.) – to disclose their relationship with the Company. We also need to monitor whether these parties are including appropriate disclosures about their relationships with P&G and

making accurate claims about our products or our Company. For more information on making the proper disclosures, please see the Global Influencer/Blogger/Vlogger/WOM Guidelines and setting up acceptable monitoring processes.

- **Do not reveal any of the Company's competitive, confidential, or non-public information:** Be familiar with the [Information Asset Classification](#) of information you possess. For example, do not post financial information or proprietary information about P&G, our Brands, or your projects. Information Security policy generally prohibits posting confidential data on the Internet.

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- **Give credit where credit is due and do not violate others' rights:** Do not claim authorship for something that is not yours. If you use someone else's material, make sure you have the proper rights to use it. Do not use copyrights, trademarks, rights of publicity or similar rights of others (e.g., comic strips, music, photos, video clips) without the necessary permission. Ensure you use such materials consistent with the terms of such permission. Do not assume that permission for one type of use online or in Social Media allows for broad promotional use elsewhere (e.g., the permission granted may be restricted to certain geographies, certain time periods, certain brands/products, certain media/content channels, etc.). If you have any questions, please contact SMO Legal.
- **Avoid the appearance of Company-sponsored posts:** The Corporate Brand ("P&G") handles should be the origin of Corporate content which Brands are free to share. If you have questions about clearance for any social media content, seek counsel from Brand Legal and Corporate Communications. Similarly, for trending consumer complaints or controversy, contact Communications and Legal for handling guidance.
- **Be media trained:** If you are engaging in Social Media activities on behalf of the Company or any one or more of its brands, make sure you undergo the proper training and have current information that has been approved by Legal and Communication on any substantive issues you address.

- **Be mindful that you are representing the Company:** Consistently demonstrate respect when interacting on Social Media sites. Be respectful of all individuals, ethnicities, cultures and religions. Don't use or repeat inflammatory words. Keep it polite and consistent with our PVPs.
- **Do not use P&G passwords as your Social Media passwords:** Your password for your P&G Intranet/email account must remain confidential. If you use your P&G email address in Social Media sites as part of your job responsibilities, never use the same password for your P&G Intranet/email account and the external Social Media site to which you are posting materials. Use strong Social Media passwords, particularly if you are a Social Media account administrator or Communications manager.
- **Do not engage with competitors:** Do not engage with any representatives from competitive brands or on forums/sites which are sponsored by competitors.

3. Ensure your Company-sponsored participation in Social Media complies with the law and Company policy: Refer to and familiarize yourself with the policies located on Brand University. If you are a third party without access to Brand University, contact your P&G business resource with questions.

- **Collecting or using Personal Data:** If, as part of a campaign, website, etc., you may be collecting Personal Data of any type and for any reason, consult [Privacy Central](#) for relevant guidance.



Use of Social Media for Collaboration with Business Teams

Social Media can be helpful in connecting individuals and teams for joint work on documents, communicating both broadly and specifically, and sharing ideas and best practices – both internally with co-workers and externally with various partners.

As with other business collaboration tools, employees must follow the WBCM, Company policies and local laws when using Social Media for internal collaboration. When used by employees for collaboration purposes, there are some additional standards and procedures that must be followed to ensure both the individual employee and the Company are protected. An employee's failure to comply with these standards and procedures when using Social Media for collaboration purposes at P&G may result in disciplinary action up to and including termination.

% Use Company-hosted tools for work-related collaboration: For collaboration among P&G employees only, you must use Company-sponsored tools that are internally hosted, such as PG Daily News, PGOne, and PGTube. These tools have already been vetted corporately for compliance requirements. You should be familiar with and adhere to the Acceptable Use Policy.

& Protect Company assets and confidential information: If you are using a non-P&G hosted site for collaboration, you must protect confidential and proprietary information when using this site. For example, do not post financial information or proprietary information about P&G, our Brands, or your projects. This applies even on so-called "secure" or "secret" group sites that offer purported privacy and security settings. "Secret" sites and sites offering personalized privacy and security settings mean only that the sites cannot easily be found in a search by other consumers/users of those sites. It does not mean that these sites are secure or free of viruses or other harmful components conducive to hacking etc. In addition, any information posted on such external, non-P&G sites– even when those sites are "secret" or have enabled personalized privacy settings – can still be viewed by the developers of the site (e.g., social network employees could read your postings). Be familiar with the [Information](#)

[Asset Classification](#) of information you possess. Information Security policy generally prohibits posting confidential data on the Internet.

' " Use external social media sites for non-work related groups: Should you wish to create a site or forum for your P&G friends or peers that is not formally associated with work or P&G-sponsored (e.g., P&G friends interested in science fiction novels or a certain religion), you should use external social media sites for these interactions. These forums should not indicate or suggest P&G approval, ownership or sponsorship in any way. All other relevant aspects of the WBCM and PVPs must be followed, including, for example, protection of confidential business information. The use of external social media sites for non-work related groups is covered by this Policy's Guidelines for Employee Personal Use of Social Media.

(" Ensure new tools are approved: Any new P&G collaboration tool to be hosted internally must be approved according to the [Acceptable Use Policy](#).

)" Use different passwords: If using your P&G email address for external Social Media networking, never use the same password for your P&G Intranet/email account and your external Social Media networking site. Your password for your P&G Intranet /email account must remain confidential.

6. Get permissions from fellow employees to post photos or videos of them: Ensure that you receive permission from other employees before you post photos or videos of them on internal or external Company Social Media sites. If someone asks you to remove a photo or video showing him/her, you must do this immediately. In some countries, laws require that individual permission be obtained and documented before posting photos and/or videos.

7. Follow terms of use of the site: Ensure your use of P&G-Sponsored Social Media sites complies with the policies and terms of use for the site.



Employee Personal Use of Social Media

We use Social Media in a wide variety of ways in our personal lives, and sometimes our personal posts may naturally reflect our business lives. Whether intended or not, however, the content you post in your personal life may be viewed as representing a Company point of view. Therefore, you need to use good judgment as you engage in Social Media in your personal capacity as well.

The following guidelines apply when you use Social Media in a personal, non-work capacity – whether via a Company issued device or your personally owned devices (computers, smartphones, etc.). Behavior that violates the standards of conduct set out in the Worldwide Business Conduct Manual (WBCM) or Company policies can result in disciplinary action, up to and including termination.

1. Be transparent and disclose you work for P&G when you make Social Media postings about our business:

We encourage employees to talk about or post material related to the Company and our brands on Social Media but remember to identify that you are a P&G employee (i.e., PGEmployee not #PGEmp) in every posting. Be clear in every posting that you are not speaking as a Company representative. For example, you could say something like, “I work for [P&G/Brand X], but the views expressed in this blog/post/etc. are my own and do not necessarily reflect the views of my employer.” In addition, if you create a site or post content that gives the appearance of being linked to P&G, and/or our Brands, be clear that the post or site is not an official communication of the Company and that you are not speaking as a Company representative.

2. Do not submit false or misleading consumer reviews for Company products or competitive products:

Writing Social Media postings that are false or misleading can lead regulators in many countries to bring deceptive business practice claims and result in legal liability and negative PR. Provide honest and fair reviews reflecting your personal opinions of any of these products. Remember that if you review a P&G product or service, disclose that you work for P&G.

3. Use your personal email: When using Social Media in your personal capacity, always use your personal email, not your P&G email address, unless you are interacting on

a site used for professional development and association (e.g., LinkedIn). In those limited cases where you are using your P&G email address for such professional development Social Media sites, never use the same password as you use for your P&G Intranet/email account. Your password for your P&G Intranet /email account must remain confidential.

4. Know Company policy if you participate on professional development and association sites: Be familiar with your local country’s policy on this topic. Contact your SMO Communications representative or local Legal with questions.

5. Take care when downloading “apps” to electronic devices used for Company business: To protect the privacy and personal security of you and other P&G employees, when downloading apps to your PC or mobile device used for business purposes, do not allow transfer of confidential or proprietary information as defined by Company policy to third party social networking or other online websites or databases (e.g., Facebook, LinkedIn, etc.) as these third parties’ privacy practices may not be the same as P&G’s. When prompted, do not allow Social Media sites to access your email contact lists located on P&G hardware and software (e.g., your Contact list from your work Outlook account).

6. Protect P&G confidential and proprietary information: If talking about your job responsibilities and/or work projects on Social Media, do not disclose confidential or proprietary information as defined in Company policy even if you feel it is a “private” conversation. For example, do not post confidential financial or non-public information or proprietary information as defined in Company policy about P&G, our Brands, or your projects. Be aware that material posted on external, non-Company Social Media sites may no longer be in your control. Be familiar with the

Information Asset Classification of information you plan to post. Information Security policy prohibits posting confidential data on the Internet. We would again note, however, that none of P&G’s policies prohibits the posting or sharing of information relating to the terms and conditions of our employees.

7. Contact the Company with concerns: If you are concerned that material posted or proposed to be posted on Social Media sites may be inconsistent with the Company’s WBCM and/or contains confidential information, contact the appropriate resources (Communications, HR, Legal, [WBCM Helpline](#), Information Security, etc.).

This policy is not intended to interfere with an employee’s legally protected rights or to prohibit communications protected by local law. In this regard, employees have the right and are free to self organize, to form, join, or assist labor organizations, to bargain collectively through representatives of their own choosing, and to engage in other concerted activities for the purposes of collective bargaining or other mutual aid or protection and nothing contained in this Global Social Media Policy or other policies or procedures referenced herein shall be construed as limiting such employee rights. Employees may post photos and videos in support of their exercise of these rights so long as such posting is not in violation of applicable law. Nothing contained in these materials shall be construed as prohibiting employees from posting on external Social Media sites information that is not maliciously false concerning such things as our employees’ terms and conditions of employment including, opinions supporting or opposing unions, or making known an employee’s concerns or grievances regarding the employment relationship.

Definitions Used Within This Policy

Social Media: Media tools designed primarily for social interaction and collaboration, often featuring communications designated for a broader group (e.g., one-to-many postings and submissions) with the option for continued interaction, sharing, evolution, and “socialization” of the content.

Examples of Social Media sites and tools include: Baidu Tieba, Facebook, Google +, Instagram, LinkedIn, MySpace, Orkut, Pinterest, QQ, Quora, Qzone, Skype, Snapchat, Tumblr, Twitter, V Kontakte, WeChat, Weibo, WhatsApp, Wikipedia, Xing, Yammer, YouTube, blogs, ratings and reviews sites, and/or other local “applications” promoting social interaction within a community via any device (computer, laptop, tablet, smartphone, cell phone, etc.). An example of such a Social Media application would be a video or photo upload tool that features consumers’ User Generated Content and which is hosted on a brand’s website, mobile site, or mini-site. Social Media also includes internally hosted sites with similar functions as those indicated above, such as PG Daily News, PGOne, PGTube, category cockpits, message board teamspaces and communities, internal wiki’s, etc.

P&G-Sponsored Social Media: A Social Media presence initiated by P&G and either developed/customized by P&G or by its agencies or third parties on P&G’s behalf.

Personal Data: Any information that (i) identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household, or (ii) would be considered personal information or personal data as such term/concept is defined by applicable law. Examples of Personal Data can include names, email addresses, gender, location, phone numbers, unique IDs, cookie data, pictures, IP addresses, employee T-numbers, etc.

User-Generated Content (UGC): User-created or assembled text, comments, ratings, photos, videos, etc. that a participant in Social Media posts for all other participants of that Social Media tool to view.

