Effective August 1, 2011

Global Social Media Policy

SocialMediaPolicy.pg.com
WHO IS COVERED BY THIS POLICY
This policy applies to employees globally and members of the Company’s Board of Directors in their capacity as representatives of P&G. The policy also applies to third parties who act on our behalf, including but not limited to our suppliers and agencies.

CONSEQUENCES OF POLICY VIOLATIONS
You are responsible for knowing the Company’s principles, rules, and best practices before you engage in Social Media. If you become aware of policy violations, notify your immediate manager, HR Manager, Legal contact, and/or the WBCM Helpline. We may request that employees/agencies/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. Failure to comply with this Policy may result in disciplinary action up to and including termination.

Company Intent
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 during personal use – e.g., when we refer to the Company and/or its brands.

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, Third Party Intellectual Property and Commercial Rights, Keeping P&G Information Secure, and Using Company Assets and Technologies Appropriately (Social Media). 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 and qualify or limit your posts appropriately. Local posts, even to a limited audience, can be mistranslated, misunderstood, or illegal in other countries. See WBCM.pg.com.

2. **Be transparent and disclose you work for P&G when you make Social Media postings about our business:** If you talk about the Company or any of our brands or businesses—whether you are using Social Media for professional or personal purposes—say you work for P&G in every posting you make. These disclosures are equally important for any agency, vendor, partner, or similar third party who is representing the Company online. One easy way to do this is to prominently add the appropriate hashtag to your post, e.g., #employee (not #emp), #sponsored (not #spon), or #PGclient. Similarly, if you create a P&G-Sponsored Social Media forum (site, chat-group, etc.) clearly indicate that P&G is the sponsor.

3. **Use good judgment:** Use the newspaper headline test: How would your posting look as a headline about P&G in a major business newspaper? 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.

4. **Protect Company assets and confidential information:** Be familiar with the Information Security Data Classification of information you possess (i.e., Highly Restricted, Restricted, Internal Use and Public). For example, do not post financial information or proprietary information about P&G or your projects. Information Security policy generally prohibits posting Highly Restricted, Restricted and Internal Use data on the Internet. See Security.pg.com.

5. **Be responsible in your use of technology:** Electronic messages are permanent, transferable records of your communications and can affect the reputation of our Company. Provide worthwhile, factual, non-confidential information and perspective. You should have no expectation of privacy with respect to postings made on public or internal Social Media sites. We are each responsible for and may be held accountable for our words and actions.

6. **Protect individual privacy:** Ensure that any collection or use of Personally Identifiable Information (PII) 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 PII. See Privacy.pg.com.

7. **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 your Legal contact or a Communication Manager before using actual materials to ensure the proposed use complies with the permissions, consents, and/or license(s) granted to us.

8. **Leave it to the pros:** 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 the appropriate P&G manager (typically the Brand Director or a Communications manager). (See “Standards & Procedures: Use of Social Media as Part of Your Job Responsibilities” section herein.) 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 may be construed as associated with the Company, such as friends, relatives, family members, etc., whom you incent, directly or indirectly, to speak about the Company and/or its products).

10. **For details on how to properly follow this policy, refer to the standards & procedures and guidance:** This policy 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. The following standards & procedures and guidance sections offer best practices to reflect the ways 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:

   • If you use Social Media as part of your job responsibilities (e.g., for Brand, Communications, CMK, R&D, Talent Supply, and other relevant functional groups), see “STANDARDS & PROCEDURES: Use of Social Media as Part of Your Job Responsibilities.”

   • If you use Social Media as an efficient means to collaborate internally and externally with your co-workers, see “STANDARDS & PROCEDURES: Use of Social Media for Collaboration and Productivity.”

   • If you use Social Media as a communication tool in your personal life, see “Guidelines: Employee Personal Use of Social Media.”
STANDARDS & PROCEDURES

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, Community Managers, Consumer Relations, agency personnel, etc.).

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 the Global Social Media Policy. Depending on the risk to the Company, the compliance plan can range from very simple/occasional procedures to more detailed/stricter requirements and checks. Click here. At a minimum:
   • Have a designated owner: Every P&G-Sponsored Social Media presence must have a designated owner (e.g., community manager) knowledgeable about his/her 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 vetted through the IRISK process, supported by GBS.
   • Review User-Generated Content initiatives with Legal: Any P&G-Sponsored Social Media which will allow consumers or external stakeholders to post photos or other UGC must get prior review from your Legal contact.

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 dialog, 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 PII 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 PII.
   • Be accurate and truthful: As an online spokesperson, you must ensure that your posts are completely 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 each post, tweet, blog, 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. For example, they should use a hashtag such as #sponsored (not just #spon), #paid, or #ad. We need to monitor whether these parties are including appropriate disclosures about their relationships with P&G and whether they’re making appropriate claims about our products or our Company. Click here.
   • Do not reveal any of the Company’s competitive, confidential, or non-public information: Be familiar with the Information Security Data Classification of information you possess (i.e., Highly Restricted, Restricted, Internal Use and Public). For example, do not post financial information or proprietary information about P&G or your projects. Information Security policy generally prohibits posting Highly Restricted, Restricted and Internal Use data on the Internet.
   • 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, and use such materials consistent with the terms of such permission. Do not assume that permission for one type of use online or

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in Social Media allows for broad-based 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 discuss with your Legal contact.

• **Go to a pro:** Do not post official information about P&G and/or our brands unless you have approval from the appropriate P&G manager (typically the Brand Director or a Communications Manager). If you have any questions about your Social Media program, seek help from the experts in the eBusiness Organization and Legal. In the case of consumer complaints, or negative comments, contact Communications.

• **Be media trained:** If you are engaging in Social Media activities on behalf of the Company or any of its brands, make sure you undergo the proper training and have current, legally- and Communications-approved information 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. Think before you respond to negative comments and 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.

• **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: Supplemental standards, procedures, and guidelines to the Global Social Media Policy are available for the below topics and more. See the Legal and Social pages on digital.pg.com.

• **Recruiting efforts and managing a digital team page:** [CLICK HERE](#).

• **Advertising, PR, or research executions:** [CLICK HERE](#).

• **Blogging or running a blogger outreach campaign:** [CLICK HERE](#) and [CLICK HERE](#).

• **User-Generated Content and repurposing UGC:** If you will ask candidates, consumers, etc. to submit their own text, photos, videos, etc. including for contests, sweepstakes or promotions or if you plan to repurpose (or re-use in any other context) any content gathered from UGC campaigns/executions, [CLICK HERE](#).

• **Repurposing or syndicating P&G assets or licensed materials on Social Media:** [CLICK HERE](#).

• **Facebook:** If you will be using Facebook for advertising purposes, hosting a brand or team page, or adding Facebook widgets/tools to P&G-Sponsored websites, [CLICK HERE](#).

• **Pinterest, Shazaam, Tumblr, Twitter, Vine:** [CLICK HERE](#).

• **Online/mobile sharing from P&G-Sponsored sites/content to third-party social networks:** [CLICK HERE](#).

• **Using celebrity spokespersons or mentioning celebrities:** [CLICK HERE](#).

• **Product ratings & reviews:** [CLICK HERE](#).

• **Mobile applications (“apps”) or SMS/text messaging campaigns:** [CLICK HERE](#).

• **‘Listening’ to consumers:** If you plan to use listening tools to understand more about what consumers and the news media are saying about your brand, your competitors, and/or your industry, [CLICK HERE](#).

• **Collecting or using Personally Identifiable Information:** If, as part of a campaign, website, etc., you may be collecting PII of any type and for any reason, consult Privacy Central for guidelines and seek approval from experienced Privacy managers if you have any questions. [CLICK HERE](#).
STANDARDS & PROCEDURES

Use of Social Media for Collaboration and Productivity

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.

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 the Global Social Media Policy. Depending on the risk to the Company, the compliance plan can range from very simple/occasional procedures to more detailed/stricter requirements and checks. CLICK HERE. At a minimum:
   - Every P&G-Sponsored Social Media presence must have a designated owner (e.g., community manager) knowledgeable about his/her roles and responsibilities.
   - Any NEW TYPE of internal Social Media presence and/or any NEW external P&G-Sponsored site must be vetted through the iRISK process (see #5).
   - Any P&G-Sponsored Social Media presence which will allow consumers or external stakeholders to post photos or other UGC must get prior review from your Legal contact.

2. 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 PGOne, business cockpits, and PGTube. These tools have already been vetted corporately for compliance requirements. Exceptions must be vetted through the iRISK process (see #5).

3. Protect Company assets and confidential information: If you are given a policy exception (see #2) to use a non-P&G-hosted site for collaboration, you must protect confidential and proprietary information when using these sites. For example, do not post financial information or proprietary information about P&G 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 on their lunch hour for fun).

Be familiar with the Information Security Data Classification of information you possess (i.e., Highly Restricted, Restricted, Internal Use and Public). Information Security policy generally prohibits posting Highly Restricted, Restricted and Internal Use data on the Internet.

4. 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 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, refraining from creating a hostile work environment, etc. Clearly, proprietary Company information should not be shared on such sites.

5. Ensure new tools are approved: Any new P&G collaboration tool to be hosted internally must be vetted through the iRISK process, supported by GBS, and meet the Policy for Appropriate Use of Hardware and Software.

6. 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.

7. 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 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.

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

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, the content you post in your personal life may be viewed as representing a Company point of view or could affect Company business. 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.) — and will help to minimize legal liability for you and P&G as well as ensure the continued long-term success of the Company.

1. Be transparent and disclose you work for P&G when you make Social Media postings about our business:
   If you decide to talk about or post material related to the Company or any one of our brands or businesses on Social Media, identify that you are a P&G employee 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, 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 consumer reviews for Company products or competitive products:
   Writing Social Media postings that reflect our natural bias as employees of the Company (i.e., perceiving our products as good and competitive products as inferior) can lead regulators in many countries to bring deceptive business practice claims and result in legal liability and negative PR.

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.

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 your P&G contact lists, address books, or calendars to third party Social Media networking or other online websites or databases (e.g., Facebook, LinkedIn, etc.) since these 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:
   Do not talk about your job responsibilities and/or work projects on Social Media even if you feel it is a “private” conversation. For example, do not post financial information or proprietary information about P&G or your projects. Use the test “if this were a news headline, would it harm the Company?” Be aware that material posted on external, non-Company Social Media sites is no longer in the control of you or the Company. Be familiar with the Information Security Data Classification of information you plan to post (i.e., Highly Restricted, Restricted, Internal Use and Public). Information Security policy prohibits posting Highly Restricted, Restricted and Internal Use data on the Internet.

Note that this guidance applies to conversations shared with your friends and family members – a casual dinner conversation you might have about your day at work might unexpectedly show up as a posting in Social Media. Follow WBCM guidance.

7. Use good judgment:
   Your online activities may impact your personal reputation, image, and ability to effectively interact with coworkers and business partners. Of course, you are free to share your personal views, but be aware of how your postings may impact you and your co-workers’ ability to contribute to the Company to your fullest potential.

8. Contact the Company with concerns:
   If you are concerned that materials posted or proposed to be posted on Social Media sites may be inconsistent with the Company’s WBCM and/or contain confidential information, contact the appropriate resources (Communications, Consumer Relations, HR, Legal, WBCM Helpline, Information Security, etc.).
Definitions

**Social Media:** Media sites and 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: Facebook, YouTube, Weibo, WeChat, Twitter, Instagram, Pinterest, Tumblr, Google+, Linked-In, blogs, forums, ratings and reviews sites, and/or other 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 or mobile site. Social Media also includes internally hosted sites with similar functions as those indicated above, such as PGOne, PGTube, business cockpits, etc.

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

**Personally Identifiable Information (PII):** Any information that directly or indirectly can identify an individual – such as, among others, name, physical address, email address, government ID, photograph, birth date, service date, family relationships, religion or belief, expressions of opinion and indication of intentions relating to individuals or any combination of such information that might allow others to identify an individual. Refer to P&G’s Employee Privacy Policy, P&G’s Global Consumer Privacy Policy, and P&G’s PII Data Classification for more detail.

**User-Generated Content (UGC):** User-created or assembled text, comments, ratings, photos, videos, etc. posted on a Social Media site or with a Social Media tool and shared with others.