



# EXTERNAL BUSINESS PARTNER (EBP) STEWARDSHIP OVERVIEW

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# OBJECTIVES – WHAT THIS OVERVIEW IS



- As an external partner to P&G, whether you are providing materials, finished products or services, the following core expectations and guidelines can help quickly **equip you to become a successful partner to P&G.**
- P&G's Worldwide Business Conduct Manual explains global standards that P&G employees must follow at all times. P&G also expects external parties with whom P&G does business to **follow standards equivalent to its Worldwide Business Conduct Manual.**
- We take ethical conduct and legal compliance very seriously. The intent behind this summary of core expectations /guidelines is to **clearly communicate P&G's standards among its external partners.**
- While we hope and expect that external parties share P&G's commitment to ethical conduct, **deviations from these expectations may result in termination of business** among other remedies consistent with contractual rights and applicable law.

# NOT OBJECTIVES – WHAT THIS OVERVIEW IS NOT



- Providing these reference document **does not change your contract with P&G**, the employment status of your workers, or the requirement that external parties alone train, manage, and supervise their own employees.
- Though we expect you to demonstrate the same commitment to governance and stewardship with comparable high standards, it remains **your responsibility to ensure compliance** with contract terms, applicable law, and ethical business practices.
- As you manage the policies and controls within your own organization, **you are responsible to identify and mitigate risks** particular to your industry, geography, workforce, and any allowed sub-vendors consistent with these general expectations.

# P&G POLICIES / EXPECTATIONS / GUIDELINES

- P&G's policy is to **operate within the spirit and letter of the law and to maintain high ethical standards** wherever we conduct business. P&G does not condone or tolerate efforts or activities to achieve results through illegal or unethical dealings anywhere in the world.
- P&G's external business partners know that **the Company is concerned not only with results, but also with how those results are achieved**. We expect all off our external business partners to conduct their business with the same high standards. We will actively seek business relationships with external business partners who share our values and promote the application of these high standards among those with whom they do business.



# 5

## GLOBAL SOURCING PRINCIPLES

These five principles establish a foundation for our discipline and serve as guidelines in our daily activities as we interact with EBPs.

- 1 BEST TOTAL VALUE**  
We make sourcing decisions on the basis of best total value offered to supply our requirements for goods and services.
- 2 HONEST, ETHICAL AND FAIR DEALINGS**  
We treat all suppliers with respect and deal with them honestly, ethically, and fairly.
- 3 EXTERNALLY LINKED SUPPLY SOLUTIONS**  
We deliver solutions that meet P&G business needs by bringing the Company's deep supply and market knowledge and access to supplier competencies, resources, and relationships around the globe.
- 4 COMPETITION AND COLLABORATION**  
We apply the strategic use of competition, collaboration or a blend of the two in our approach towards managing our supplier relationships
- 5 SUPPLIER INCUMBENCY**  
We prefer ongoing relationships with incumbent suppliers because we believe they deliver lower long-term costs and higher value to our business.

# THE FOLLOWING EXPECTATIONS / GUIDELINES ARE RELEVANT TO ALL P&G EXTERNAL BUSINESS PARTNERS (EBPs)

- 1 P&G WBCM (Worldwide Business Conduct Manual)**
  - Conflict of Interest
  - Anti-Bribery Expectations
  - Global Social Media
  - Competitive Information Collection
- 2 Gifts and Business Entertainment Expectations**
- 3 Purchase Documents Expectations**

- 4 EBPs that Manage Personal Data**
- 5 Access to P&G Systems**
- 6 Utilization of Non-P&G Workers**
- 7 Entering P&G Facilities**

- 8 Supplier Citizenship and Sustainability Compliance**
- 9 Publicity Guidelines**
- 10 Global Violence Free Workplace**

# WORLDWIDE BUSINESS CONDUCT MANUAL

- Worldwide Business Conduct Manual (WBCM) is the summary of our Purpose, Values and Principles (PVPs) that are the foundation of everything we do at P&G.
- The WBCM Includes guidelines related to:
  - Conflict of Interest,
  - Anti-Corruption,
  - Global Social Media, and
  - P&G Competitive Information Collection among others.



WBCM

# CONFLICT OF INTEREST

- An actual or personal conflict of interest can arise when a P&G employee has an **undisclosed personal relationship** with an external business partner, when such P&G employee has direct or indirect decision-making authority or influence over the business relationship.
  - Similar conflicts can arise between your company and sub-vendors you are authorized to select to perform P&G work.
- Any decision or input to decisions about P&G business must be made to **further P&G interests**, not those of individual employees or other personal interests.
- You must report via the P&G Helpline if P&G employees ask for **personal favors** or **offer special pricing** to an external business partner/contractor in exchange for some personal benefit.



# ANTI-BRIBERY EXPECTATIONS

You must not offer, give, seek, or accept bribes. You also must not allow any other party working on behalf of P&G—such as an agent, consultant, or subcontractor—to offer, give, seek, or accept a bribe. A bribe is anything that is given or offered to improperly influence the behavior of someone in business or government. It need not be made in cash. A gift, meal, drink, job offer, travel, or anything of value can also be a bribe—any attempt to “buy” an improper benefit is prohibited, no matter the amount or value of the thing offered.

P&G also prohibits “facilitation” payments. These are small, unofficial payments made to government officials that prompt or expedite routine tasks, such as clearing goods through customs, obtaining a travel visa, or connecting utilities.

The Anti-Bribery Guide further outlines P&G's expectations on anti-bribery and anti-corruption compliance. It is available from this link:

[Anti-Bribery Guide](#)



# ANTI-BRIBERY EXPECTATIONS

(CONTINUED)



**External Business Parties** providing services to P&G who may interact with government officials must:

Complete P&G's Antibribery screening process.

- 1 Agree to our anti-corruption compliance agreement:
- 2 [Print & Sign Contract – English Version](#)
- 3 Ensure their employees working on P&G business are trained and supported in robust antibribery compliance.

**Distributors** of P&G finished products are also expected to comply with the following two schedules:

[Distributor Schedule A](#)

[Distributor Schedule B](#)

# GLOBAL SOCIAL MEDIA POLICY



Many of our employees and partners use social media in their daily work. As we use social media, it's important to understand that the many laws around the world regulating what P&G can say about the Company, our brands and our products apply in social media, just as they do in many other business interactions.

P&G has developed a [Global Social Media Policy \(PDF\)](#) that describes the principles for its use, as well as standards & procedures for employees and partners when they use it as a key responsibility of their job, for collaborating internally and externally, or in their personal life.

You must take great care not to disclose confidential P&G information over social media—including photographs.

You should also remember to disclose your affiliation with P&G whenever you provide opinions or reviews of P&G or competing products and /or services. 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). 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.

# P&G COMPETITIVE INFORMATION COLLECTION POLICY

- Competitive intelligence is the process of understanding and anticipating the competitive environment in which P&G operates to maximize our competitive advantages, positively influence our decisions and consequently, impact our business results.
- P&G's Competitive Information Collection Policy is organized around Core Principles, such as:
  - We only seek to obtain competitive information in compliance with applicable laws
  - We never misrepresent or mislead anyone about our relationship with P&G
  - We do not make promises in exchange of proprietary information to customers, competitors and other third party
  - We don't use third parties as messengers of information between us and our competitors
- These expectations also apply to external business partners when acting on behalf of P&G.

P&G  
Competitive  
Information  
Collection  
Policy

# GIFTS AND BUSINESS ENTERTAINMENT EXPENSES



Exchanging anything of personal value with P&G employees can (or can appear to) improperly influence business decisions, as well as create strain and awkwardness in the business relationship. This is because P&G employees are required to conduct their work solely in the interests of P&G. They are prohibited from personally benefiting in a meaningful way from any external party's dealings with P&G.

**For this reason, external parties must not attempt to improperly influence P&G employees using gifts, meals, entertainment, travel, hotel accommodations, or anything else of value.**

# GIFTS AND BUSINESS ENTERTAINMENT EXPENSES

(CONTINUED)

## SOME EXAMPLES:



P&G expectation is to host our share of appropriate business lunches / dinners.



We expect the cost of business lunches and dinners, regardless of who pays, to be modest.



Accepting tickets, or any other gift, from an external business partner or customer raises significant conflict of interest concerns within P&G. If the tickets to a game are not associated with any business event (e.g., they are purely for personal use), this will be graciously declined. If the tickets are for P&G team and co-workers so they can attend the game with representatives of the customer, then attending the event may have genuine business relationship-building value and will be assessed by P&G management appropriately.

Gifts and Entertainment Expectations

# PURCHASE DOCUMENTS EXPECTATIONS

Work/service for P&G should only start when a Purchase Order is received by the External business partner. NO PO = NO Service/Work

Purchase orders are governed by the Procter & Gamble Terms and Conditions for the Purchase of Goods /Services that you can open from these links:

EBP's supplying Raw & Pack goods must have relevant P&G purchase documents before providing the goods.

P&G expects to have a clear scope of work and required proof of performance documentation defined at time of the agreement.

Where needed, external business partners are required to have signed contracts with a P&G Purchases contact (Statements Of Work (SOW), Master Service Agreements, Supplemental Agreements) for goods/services that will be delivered to P&G.

English

中国

Türk

Русский

한국어

Français

Español

العربية

Português

# EXTERNAL BUSINESS PARTNERS THAT MANAGE PERSONAL DATA



The Privacy requirements apply to all Third Parties who manage Personally Identifiable Information (PII) for or on behalf of P&G.

These requirements are the basic organizational security and privacy requirements for external business partners. They describe the expectations P&G has with external business partners and external business partners to align with the P&G Information Security and Privacy Policies.

Privacy & Security Requirements for External Business Partners  
[P&G's Privacy & Security Requirements for External business partners](#)

The following Exhibits make up P&G's Privacy and Security requirements for vendors who access or handle P&G Personal Data on behalf of P&G:

- [Exhibit A P&G Privacy Requirements](#)
- [Exhibit B Standard Contractual Clauses for Personal Data Vendors who transfer P&G Personal Data across certain country borders](#)
- [Exhibit C P&G Information Security Requirements](#)

Contact your Purchases representative for support.

# EXTERNAL BUSINESS PARTNERS THAT MANAGE PERSONAL DATA

(CONTINUED)

## PERSONAL DATA

- Personal data, also known as PII (Personally, Identifiable Information) is classified based on the types of data processed (name, consumer email address, etc.) and volumes of personal data processed or handled by the end user. Third Parties collecting or processing PII as part of the activities provided to P&G must be specifically assessed on their Privacy handling capability.
- Respond to the assigned PII screening and remediate any outages required to complete the screening.
- EBP's Employees (and Subcontractors) must be made aware of the key elements of P&G's Privacy Requirements and understand their personal responsibilities. Staff must be trained in how to implement P&G's Privacy Requirements.
- If applicable ensure Information Security and Privacy compliance is included in the contract.



# P&G RETENTION SCHEDULES FOR PERSONAL DATA

**These retention schedules apply to P&G United States (US), European Union (EU) and United Kingdom (UK) consumer and employee data, only.**

They **do not** apply to P&G consumer and employee data from other countries. The general rule is that any personal data should not be kept for longer than it is needed to provide the service. The periods outline the maximum time personal data should be kept by External business partner in providing the services. If the External business partner can delete the personal data sooner, this should be done. If a Master Services Agreement or Statement of Work provides for a more specific retention period for US, EU or UK personal data for the services you are providing to P&G, that retention period takes precedence over this document.



# P&G SYSTEM ACCESS POLICY

- This policy requires that individuals are authorized for specific business purposes by requiring them to be granted access privileges in line with their role.
- Individuals must be authenticated use access control mechanisms (e.g. password, token, biometric) and subject to a rigorous sign-on process before being provided with approved levels of access.
- This policy also protects the business information that provides access to partners, customers, contractors, and consumers by performing information risk assessment to determine the information security requirements and implementing security arrangements in contracts and agreements.



System Access Policy

# UTILIZATION OF NON-P&G WORKERS

- P&G establishes and maintains clear distinctions between P&G employee relationships and those with External Party resources.
- External Party resources are not used to establish an entry process for employment at P&G or on an ongoing basis to fill or delay filling P&G positions.
- External Party resources should perform work or service that are different from the work or service executed by P&G employees and be distinguishable from P&G employees (e.g. uniforms, work areas, badges). Any use of External Party Resources to perform work or services normally performed by P&G employees must be infrequent and short-term.
- External Party Resources must be utilized in a manner that remains compliant with the spirit and letter of the local labor law, international labor standards, P&G's Human Rights Policy Statement, PVPs and WBCM



[Link: Utilization of Non-P&G Workers](#)



# ENTERING P&G FACILITIES

**All visitors must provide their credentials to the receptionist upon entering P&G facilities.**

- All visitors will always display the badge provided at the entrance of the facility.
- Where applicable the visitors will follow all safety and security protocols required by the P&G facility.
- All visitors will be allowed access via P&G authorized escorts.



Accessing P&G Facilities

# P&G SUPPLIER CITIZENSHIP

P&G is committed to providing products and services of superior quality and value to the world's consumers, now and for generations to come. Our Citizenship framework is how we are investing in the United Nations Sustainable Development Goals and include focused programs in Diversity & Inclusion, Gender Equality, Sustainability, Community Impact and Ethics & Corporate Responsibility.

P&G cannot deliver those products without collaboration from our supply chain partners and we are making intentional choices to leverage the footprint of our external business partners, buyers, and manufacturing sites to be a Force for Good and a Force for Growth. We believe we can accelerate and amplify our Citizenship results by intentionally enrolling our External Business Partners in this work via two strategy pillars: Supplier Diversity and Responsible Sourcing.



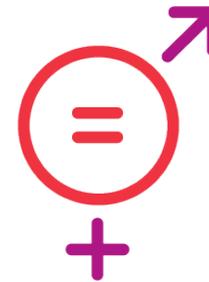
**ETHICS &  
CORPORATE  
RESPONSIBILITY**



**COMMUNITY  
IMPACT**



**DIVERSITY &  
INCLUSION**



**GENDER  
EQUALITY**



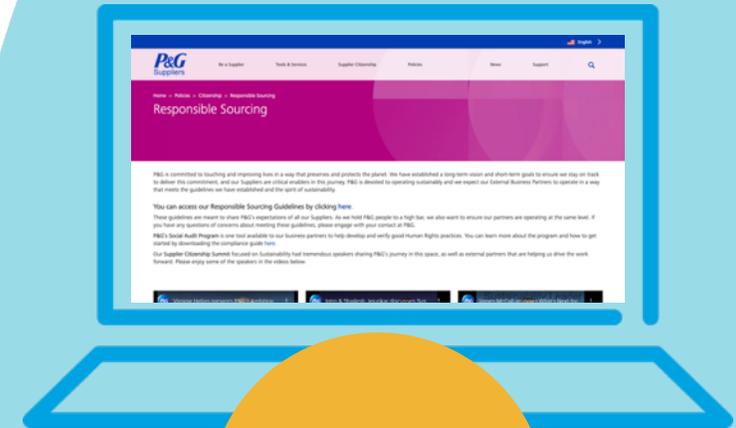
**ENVIRONMENTAL  
SUSTAINABILITY**

# SUPPLIER SUSTAINABILITY COMPLIANCE GUIDE

These Sustainability Guidelines for External Business Partners explain the global standards to be followed in your daily business activities on behalf of P&G. External business partners and their suppliers are expected to share P&G's commitment to these standards. P&G reserves the right to conduct audits to assure compliance with these guidelines and reserves the right to discontinue any relationship should the external business partner violate, fail to correct, or have a pattern of violating these guidelines.

## This guides cover:

- Legal Compliance
- Human Rights
- Child Labor
- Forced Labor, Human Trafficking & Employment Eligibility
- Wages and Hours
- Coercion, Harassment and Discipline
- Discrimination
- Health & Safety
- Environmental Sustainability
- Freedom of Association and Collective Bargaining
- Preventing Bribery and Corruption
- Gifts, Entertainment and Gratuities
- Employee & Data Privacy
- Personnel & Facility Security
- The P&G Worldwide Business Conduct Helpline



[pgsupplier.com](https://pgsupplier.com/ResponsibleSourcing)  
[Responsible Sourcing page](https://pgsupplier.com/ResponsibleSourcing)

with the [expectations](#) and the social audit [guide](#).

# PUBLICITY GUIDELINES

- P&G generally does not allow External Business Partners to reference publicly their relationship with P&G and our brands due to the confidential nature of our partnerships.
- Examples of this include (but are not limited to): Use of P&G logo, press releases, testimonials or references, P&G speaking requests at External Business Partner or industry events, external award submissions.
- In some cases, it may be beneficial to both P&G and the EBP to do some sort of publicity. In these cases, P&G Purchases should be contacted first, who will assess and then link with Communications, Legal, and other necessary functions to secure an exception to our policy, where appropriate.



# GLOBAL VIOLENCE-FREE WORKPLACE POLICY



Procter & Gamble provides a safe and secure environment that is free of any form of violence for our employees, non-P&G workers, visitors, etc. At P&G, “violence” includes threats or acts of violence towards people or property, intimidation of others, or attempts to instill fear in others. Weapons are not allowed in the workplace.

There is nothing more important to P&G than the safety and security of its employees and visitors. In support of this principle, threats or acts of violence against employees or any other authorized third party on our premises and/or property will not be tolerated. Violations of this policy will lead to disciplinary action up to and including termination of employment, or removal if an external party, and the involvement of local law enforcement authorities as needed.

## [Violence Free workplace Policy](#)

The HS&E policy referenced in the Terms and Conditions is available from this link:

[P&G HS&E Policy](#)

# OTHER SERVICE-SPECIFIC EXPECTATIONS/GUIDELINES

LOCATED ON THE P&G SUPPLIER PORTAL: [pgsupplier.com](https://pgsupplier.com)

All external business partners who deploy, manage, or support P&G IT assets (applications, data, platforms, software, networks and information systems) and /or require access privileges to any P&G system to perform their role.

## INFO SEC

POLICY	POLICY/GUIDELINE	RELEVANT FOR SUPPLIERS
Info Security Threat & Incident Management	<a href="#">link</a>	All suppliers who deploy, manage, or support P&G IT applications, data, platforms, software, networks and information systems.
System Access	<a href="#">link</a>	All suppliers who require access privileges to any P&G system to perform their role.
Technical Security Management	<a href="#">link</a>	All suppliers who deploy, manage, or support P&G IT applications, data, platforms, software, networks and information systems.



# OTHER SERVICE-SPECIFIC EXPECTATIONS/GUIDELINES

(CONTINUED)

For External business partners providing Beauty Care Business services where U.S. State Requirements for Animal Testing and /or Expectations for Cruelty-Free Brands apply, and External business partners located in, or doing business in, France the following guidelines apply related to French Black Labor.

## SUPPLIER CITIZENSHIP

POLICY	POLICY/GUIDELINE	RELEVANT FOR SUPPLIERS
Supplier Sustainability Compliance Guide	<a href="#">link</a>	Relevant for all suppliers.
French Black Labor	<a href="#">link</a>	Suppliers located in, or doing business in, France
U.S. State Requirements for Animal Testing	<a href="#">link</a>	Relevant for all suppliers.
Beauty Supplier Expectations for Cruelty-Free Brands	<a href="#">link</a>	Relevant for all Beauty suppliers.

For External business partners providing IT services to P&G please review the applicable expectations / guidelines.

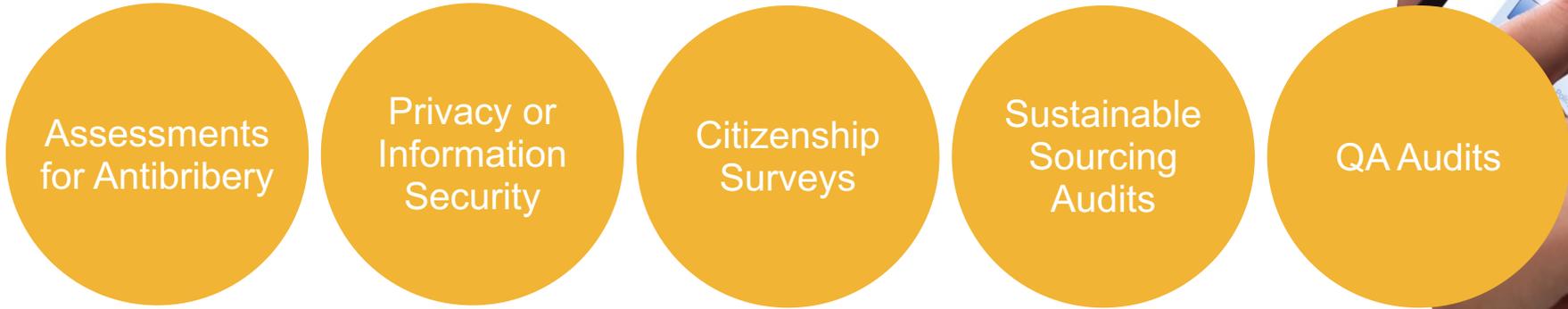
## IT

POLICY	POLICY/GUIDELINE	RELEVANT FOR SUPPLIERS
IT Risk Management	<a href="#">link</a>	All suppliers who deploy, manage, or support P&G IT applications, data, platforms, software, networks and information systems.
IT Continuity	<a href="#">link</a>	All suppliers who deploy, manage, or support P&G IT applications, data, platforms, software, networks and information systems.
IT Change Management	<a href="#">link</a>	All suppliers who deploy, manage, or support P&G IT applications, data, platforms, software, networks and information systems.
IT Service Validation & Testing	<a href="#">link</a>	All suppliers who deploy, manage, or support P&G IT applications, data, platforms, software, networks and information systems.
Information Asset Clarification	<a href="#">link</a>	All suppliers who are storing, transmitting, processing, or otherwise managing information no matter the physical or digital form of the information or where it is stored.
Acceptable Use of P&G Technology	<a href="#">link</a>	All the suppliers using technology to conduct business for P&G, regardless of whether the technology is owned by P&G, the employee, or by the Third Party.
IT Application Development	<a href="#">link</a>	Relevant for all suppliers.
IT Asset Management	<a href="#">link</a>	Relevant for suppliers who will manage IT Assets on behalf of P&G. This typically applies to anyone managing hardware (physical or virtual) devices.
Network & Communications	<a href="#">link</a>	Relevant for all suppliers deploying network hardware.



# P&G VARIOUS REQUESTS EXPECTATIONS

All EBPs should reply to P&G various requests such:



Reply timely on all requests.



# IN CLOSING

If you have concerns that P&G employees or your employees performing P&G business have deviated from these expectations or violated some other applicable policy, legal requirement, or ethical standard, promptly report this to the P&G Helpline [here](#).

P&G does not tolerate any form of retaliation against people who report a suspected violation in good faith. This is not just something we say, but a commitment we actively work against when a report is made.

The screenshot shows the P&G Ethics & Compliance Office website. The header includes the P&G logo, 'Ethics & Compliance Office', and navigation links for 'Home', 'P&G Worldwide Business Conduct Manual', 'P&G Privacy Statement: Employee', and 'P&G Privacy Statement: Non-Employee'. The main content area is titled 'Welcome to the Worldwide Business Conduct Helpline' and contains a paragraph explaining the helpline's purpose: 'Doing the right thing isn't always easy. That's why we're here to help. By speaking up and sharing your concerns about workplace conduct you can help preserve and promote P&G's culture of integrity. Use this Helpline to speak up about any business or workplace conduct that seems inconsistent with our PVPs, policies, or the law. It is staffed by an independent company called NAVEX Global to ensure your voice can be heard around the world 24 hours a day, seven days a week.' Below this text are four blue buttons: 'Report a concern online', 'Report a concern by phone', 'Ask a question', and 'Follow-Up'. At the bottom, there is a commitment statement: 'P&G does not tolerate any form of retaliation against people who report a suspected violation in good faith. This is not just something we say, but a commitment we actively work against when a report is made.' and contact information: 'Concerns of Immediate Danger or Threats of Violence Call P&G Global Security right away at 1-513-983-3000 (voice prompt 3). The phone is answered 24 hours a day, 7 days a week by a Global Security Representative.'

# IN CLOSING

(CONTINUED)



**We take compliance very seriously.** The intent behind our core expectations / guidelines is to enable compliance at the highest standards for P&G and its partners and to protect and value the information of our customers, consumers, shareholders AND external partners.

**If you have any questions** about the expectations / guidelines, ask your P&G Purchasing contact for clarifications.

**As you manage the policies and controls within your own organization,** please take note of our expectations on how to conduct business with or for P&G, including as to allowed sub-vendors handling projects for P&G.

**This is not a one-time overview;** we expect that you review all the relevant expectations / guidelines with appropriate frequency (i.e. once a year).