

Gifts & Entertainment

Procter & Gamble expectations for external business partners

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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 through the use of gifts, meals, entertainment, travel, hotel accommodations, or anything else of value. In practice, this means:

- Do not give gifts in any amount or of whatever nature to P&G employees.
- Paying for business meals involving P&G employees (or allowing them to pay for you) may be allowed but only if the purpose is to discuss business or build relationships, and the meal is eaten together. The cost must be reasonable and, over time, the number and value of meals paid for by each party should be comparable. Do not pay for the meal of a P&G employee, however, if you are a prospective external party seeking to do business with P&G.
- Special restrictions apply when offering to pay for conference fees, business entertainment, travel, hotel, or other accommodations of P&G employees. Paying for P&G expenses in such situations is almost never permitted, so do not proceed unless your P&G contact has confirmed compliance with P&G policy.

Please understand that P&G does not intend to be discourteous in declining gifts and well-intended social courtesies. It is simply a matter of respecting the boundaries of a proper business relationship and avoiding any personal benefit that could have—or could be misunderstood as having—the effect or appearance of improperly influencing P&G decisions.

P&G sets high standards for itself and everyone who contributes to our business, including ensuring the highest standards of integrity. We require our external business partners to demonstrate the same commitment through their actions on behalf of P&G and their interactions with P&G employees. However, it remains the responsibility of external parties to maintain their own policies on gifts and entertainment as to their own employees.

If you have any questions about these expectations, please ask your P&G contact or email P&G's Ethics & Compliance Office at compliance.im@pg.com

This document provides a general overview only. It does not represent the complete policy of P&G and is not legal advice. It does not provide an exhaustive treatment of all legal issues or risks in this topic area, nor does it affect any contract or agreement you may have with P&G. It also does not substitute for your responsibility to comply with all relevant laws, develop effective training programs to identify and mitigate risk, and seek advice from qualified counsel in particular situations.