

Dear Business Partners,

It is P&G's belief that how we operate as a Company, and as individuals, is based on the principle of doing the right thing in all that we do. This leads consumers to place their trust in us, our customers and business partners to do business with us, our shareholders to invest in us, our external stakeholders to respect us, and the best talent to join us in working for P&G.

We operate within the spirit and letter of the law, maintaining high ethical standards wherever we conduct business. We actively seek business relationships with partners who share our values and promote the application of these high standards among those with whom they do business.

The **Sustainability Guidelines for External Business Partners** outlined in this document explain the global standards to be followed in your daily business activities on behalf of P&G. Please read and understand these guidelines, and make sure your processes and guidelines are aligned to them. We also encourage you to set similar expectations to your own suppliers, so we jointly create more resilient supply chains. Please count on P&G's support in this journey.

Sincerely,

Stew Atkinson The Procter & Gamble Company Chief Purchases Officer





# Sustainability Guidelines for External Business Partners (May 2014)

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 also reserves the right to discontinue any relationship should the external business partner violate, fail to correct, or have a pattern of violating these guidelines.

### **Legal Compliance**

External business partners must follow the law at all times. External business partners and their employees must ensure they understand how these standards and the law apply to their work on behalf of P&G. No external business partner has the authority to require or request that any of their employees or anyone else to violate these standards or any law or regulation.

#### **Human Rights**

P&G respects internationally recognized human rights as defined by the Universal Declaration of Human Rights and Associated Covenants, and the International Labor Organization (ILO) Declaration on the Fundamental Principles and Rights at Work. We expect our external business partners to respect these internationally recognized human rights. In our business award decisions, we will continue to place substantial value upon incumbent and potential external business partners who consistently respect these human rights. Our commitments to human rights are detailed in our <u>Human Rights Policy Statement and Social Policies & Statements</u>.

## **Child Labor**

P&G's external business partners will not use child labor. The term child refers to a person younger than 15 (or 14 where local law allows) or, if higher, the local legal minimum age for employment or the age for completing compulsory education. P&G prohibits assigning young workers (i.e., under 18 years of age or as defined by local law) to hazardous work based on age limits and types of work (e.g., night work) defined by local law.



# Forced Labor, Human Trafficking & Employment Eligibility

Employment must be voluntarily and freely chosen. External business partners including recruitment agencies must verify the legal employment eligibility of employees to work. External business partners including recruitment agencies must not use prison labor, indentured or bonded labor, human trafficking, or modern day slavery. External business partners must never use corporal punishment or other forms of mental and/or physical coercion. External business partner employees should not be required to lodge deposits or identity papers, or to pay recruitment fees, and should be free to leave their employee after reasonable notice. P&G expects those recruitment agencies that work for P&G to train their employees who are assigned to work on the P&G account to ensure they understand these requirements.

#### Wages and Hours

External business partners must comply with all applicable wage and hour laws, including minimum wage, overtime, maximum hour rules, meal and rest periods, and to provide legally mandated benefits. Where local industry standards exceed applicable legal requirement, external business partners are encouraged to provide wages that meet the higher local industry standards.

#### **Coercion, Harassment and Discipline**

P&G expects its external business partners to treat their employees with dignity and respect. External business partners are expected to have systems in place to prevent, detect, and resolve unacceptable worker treatment such as harassment, inappropriate use of discipline, discrimination, physical or mental punishment, or other forms of intimidation or abuse (e.g., physical abuse, threat of abuse, sexual or other harassment, verbal abuse, any type of corporal punishment, or other forms of mental and/or physical coercion as a form of discipline).

#### **Discrimination**

Discrimination based on race, color, gender, age, national origin, religion, sexual orientation, gender identity and expression, marital status, citizenship, disability, veteran status, medical condition (e.g., HIV/AIDS status, pregnancy, etc.), or any other legally protected factor will not be tolerated. External business partners must not discriminate in their hiring and employment practices (e.g., pay/promotion) and must follow all employment laws. Employment decisions must be based on merit, skills, and work experiences.



## **Health & Safety**

External business partners must comply with all applicable health and safety laws, rules, regulations and industry standards. We expect our external business partners to be committed to and support the improvement of the health and safety of their operations, employees and the surrounding community. Our external business partners are expected to take all reasonable and necessary actions to prevent accidents and injuries, analyze and minimize health and safety risk exposure, protect their physical assets, ensure business continuity and engender public trust. If a question arises relating to the industry standards for key ingredients, contact your P&G Purchases representative.

#### **Environmental Sustainability**

External business partners must comply with all applicable environmental laws, rules and regulations. P&G recognizes that we must be responsible for environmental stewardship and using resources wisely. We strive to be socially responsible in the use of Company resources for the long-term benefit of society. Our commitments to environmental sustainability are addressed in our Environmental Policies & Statements. External business partners are expected to share P&G's commitments and maximize the value and quality of their products by using resources responsibly, preserving the environment and reducing the environmental footprint of their operations. P&G will identify and notify external business partners that will be required to use and submit the scorecard or designated equivalent on-line tool to track improvement on environmental sustainability metrics. All other external business partners are encouraged to use the scorecard for their internal use if applicable. Click here for information and training materials on the Supply Chain Environmental Sustainability Scorecard.

## **Freedom of Association and Collective Bargaining**

External business partners must respect their employees' right to choose to join or not to join a trade union, or to have recognized employee representation in accordance with local law. External business partners are expected to maintain constructive dialogue and negotiate in good faith with such representatives. External business partners shall not harass, discriminate against, or otherwise penalize workers, worker representatives, or trade union members because of their interest and/or membership in, or affiliation with, a trade union, or their legitimate trade union activity, in accordance with international labor standards.



# **Preventing Bribery and Corruption**

External business partners must conduct business with integrity and in full compliance with the law. External business partners must not give, agree to give, offer, or receive anything of value to influence the behavior of another business partner or government official in order to obtain an improper benefit or advantage. Government officials include government employees (including employees at government-controlled or owned entities, such as hospitals, and energy and media outlets in certain countries), elected officials, political party officials, or candidates for public office or for a political party. External business partners must not make "facilitating payments," which are small payments (or "tips") to individual government officials to expedite routine government actions.

## **Gifts, Entertainment and Gratuities**

External business partners are expected to respect and comply with our policy on gifts, entertainment, and gratuities. P&G's policy generally prohibits receiving gifts, entertainment or other gratuities from people with whom P&G does business and is not acceptable, because doing so could imply an obligation on the part of the Company and potentially pose a conflict of interest.

## **Employee & Data Privacy**

External business partners must respect the privacy of their employees as well as those whose personal data P&G entrusts with them to provide products or services. P&G expects external business partners to properly protect and use personally-identifiable information. P&G expects that all external business partners will train their employees and subcontractors' employees assigned to work on the P&G account to ensure they understand the requirements and their personal responsibilities for protecting P&G personal information and as well as all P&G information.

Our Privacy goal at P&G is to protect, collect and use personal information only for the purpose for which it was provided. We do not trade, sell or lease personal information entrusted to us. A complete statement of P&G's privacy policy may be found at

http://www.pg.com/privacy/english/privacy\_statement.shtml.

# **Personnel & Facility Security**

External business partners will comply with all applicable laws related to General Conduct, Apprehension/Detention of personnel as it relates to their duties as a security provider. External business partners must ensure that all persons are treated humanely, respect their dignity and privacy, prohibit torture or other cruel inhumane or degrading treatment, sexual exploitation and abuse or violation or discrimination. External business partners will train their employees on these and other legal requirements.



# The P&G Worldwide Business Conduct Helpline

We encourage external business partners and employees of external business partners working on P&G's business to report any violations of P&G Policy or the law. Reports can be made to P&G directly by any of the following means:

The P&G Worldwide Business Conduct Helpline is a toll-free number you can call 24 hours a day, seven days a week, to report any serious concerns.

- Dial +1-800-683-3738 (if you are located in the United States, Canada or Puerto Rico)
- Dial country code 01 and then call collect at 704-544-7434 (in any other location)

The P&G Worldwide Business Conduct Helpline is staffed by an independent company and can take calls in most languages. P&G will not attempt to trace your identity. When calling the P&G Worldwide Business Conduct Helpline, you can report actual or suspected violations anonymously, where allowed by local law. Please keep in mind, however, that it may sometimes be more difficult or even impossible for P&G to thoroughly investigate reports that are made anonymously. You are therefore encouraged to share your identity when making a report via the P&G Worldwide Business Conduct Helpline. Your identity will be kept confidential, to the extent allowed by law.

# The P&G Ethics and Compliance Committee

P&G Ethics & Compliance Committee consists of the Chief Executive Officer, the Chief Financial Officer, the Chief Legal Officer, and the Global Human Resources Officer.

- Email: ethicscommittee.im@pg.com
- Send mail to: The Procter & Gamble Company Ethics & Compliance Committee One Procter & Gamble Plaza (C-11) Cincinnati, OH 45202

# **The P&G Corporate Secretary**

- Email: corpsecretary.im@pg.com
- Send mail to: The Procter & Gamble Company Corporate Secretary, One Procter & Gamble Plaza (C-11)
  - Cincinnati, OH 45202