

## **RAISING CONCERNS AT P&G REPORTING PROCESS AND NOTICE OF PRIVACY**

Doing the right thing isn't always easy. That's why we're here and committed to help. By speaking up and sharing your concerns about workplace conduct or business practices, you support P&G's culture of integrity. Employees, consumers, suppliers, and other external parties can speak up about any business or workplace conduct that seems inconsistent with P&G's values, policies, or the law. This does not preclude you from confidentially sharing your concerns to a government agency, personal advisor, or other appropriate resource, nor taking other steps legally protected under applicable law.

### **Where can I raise questions and concerns?**

P&G expects employees and external parties to do the right thing in conducting P&G business, using sound ethical judgment even in uncertain situations. Maybe you don't know if the right policy was followed or if proper compliance steps were taken. Perhaps you're concerned by a decision or action that does not seem consistent with P&G's standards and values. No matter your role or location, there are trusted resources who can help.

#### Employees

If you need to raise a question or concern, your immediate manager is likely the best person to speak to because they know your business unit and your situation.

If you are not comfortable talking to your immediate manager, you can discuss the issue with a higher level manager in your reporting line or the Human Resources expert for your team. You can also contact a manager in the following groups to seek guidance or report your concerns:

- The Ethics & Compliance Office
- Finance & Accounting
- Global Internal Audit
- Global Security
- P&G Legal

If you need contacts for these resources, you can reach out to [compliance.im@pg.com](mailto:compliance.im@pg.com).

#### Non-employees and Employees

Anyone with a concern can contact the P&G Ethics & Compliance Office, the Ethics & Compliance Committee, or the P&G Corporate Secretary. Contacts for these resources can be found at <https://ewbcm.pg.com/resources>.

In addition, P&G maintains a Worldwide Business Conduct Helpline to be available around the world 24 hours a day, seven days a week. This kind of resource is sometimes called a "whistleblower line." It is staffed by an independent company and can take calls in most languages. When contacting the Worldwide Business Conduct Helpline, you can report actual or suspected violations anonymously, where allowed by applicable law. The Helpline can be found at [www.pg-helpline.com](http://www.pg-helpline.com).

## **What happens next?**

Investigations are initiated upon allegations claiming violations of the law, Worldwide Business Conduct Manual, or P&G policy. The purpose of the investigation is to find out if wrongdoing occurred based on all the relevant evidence. All other allegations—for example disagreements with co-workers about working style or personal preferences, dissatisfaction with one’s manager, or unhappiness with performance feedback—that do not involve a violation of the law, Worldwide Business Conduct Manual, or P&G policy may be routed to Human Resources or another appropriate resource for handling.

When a report is received, trained P&G investigators will be appointed to look into the facts and are supported by other resources needed to conduct an appropriate investigation. Typically, this may involve one or more managers from Human Resources, Global Internal Audit, the Ethics & Compliance Office, Legal, or Global Security.

They will typically contact the person raising the concern for additional information as well as others with relevant data. If you have reported anonymously, they can contact you by leaving a message for you with the Worldwide Business Conduct Helpline, which you can then reply to, still maintaining anonymity if you choose.

Anyone contacted to provide information for an investigation is expected to cooperate fully and honestly, responding to questions and requests for relevant records. This is a key part of P&G’s commitment to conducting business in full compliance with applicable laws and with the Worldwide Business Conduct Manual. You can be confident that P&G’s process is designed to be fair, thorough, and respectful, led by expert and impartial investigators who are simply seeking to find out the facts, not take sides.

Following a fact-based, objective inquiry, the investigators will determine whether the allegation (that is, a claimed violation of the Worldwide Business Conduct Manual, policy, procedure, or law) is unsubstantiated or substantiated. Substantiated cases may result in changes to business processes and/or disciplinary action against responsible parties in line with applicable law and local consultation procedures. Once the investigation is completed, those involved will be notified if there is any need for further data or action.

This process is intended to ensure that the correct resources are assigned so that allegations are investigated and resolved appropriately and that any person raising a concern or participating in an investigation is protected from retaliation. These steps help ensure prompt, proper, and thorough investigation and resolution of reported concerns. However, the steps involved in each case depend on the facts of a particular situation consistent with P&G standards and applicable local law.

## **How is my personal data managed in this process?**

P&G’s trained investigators manage their work with sensitivity and discretion, disclosing information on a strictly limited need-to-know basis to support legitimate incident management needs or as required by law.

P&G's incident management process is subject to the Company's privacy policies and controls designed to properly manage your personal information and comply with data protection requirements. To learn more about P&G's data protection processes:

- Employees – please see [here](#)
- Non-employees – please see [here](#)
- For those contacting the Worldwide Business Conduct Helpline – please see the privacy policy of Navex, the independent company providing this service [here](#)

If you have concerns about a privacy or data security incident, however, immediately notify P&G experts at [securityincident.im@pg.com](mailto:securityincident.im@pg.com). This process addresses concerns about an incident that could compromise the confidentiality, integrity, or availability of P&G information or operations, including unauthorized access to personal data, whether caused by P&G personnel or external parties through intentional or unintentional means.

### **How else am I protected?**

P&G does not tolerate any form of retaliation against those reporting a suspected violation in good faith. In addition, no one who participates or cooperates honestly and completely in the investigation of a report will be subject to retaliation for doing so. Anyone who retaliates against a person for making a good faith report or for participating in an investigation will be subject to disciplinary action, which may include termination in line with local laws and consultation procedures.

Depending on applicable law, you may have the right to access your personal data processed in these steps and to make corrections in the event of an error, subject to confidentiality and data protection considerations involving other parties. Please see the privacy policies noted above for further details.

### **Where can I find additional information?**

Proper investigation is essential to promoting a culture of integrity, reducing the likelihood of incidents occurring and increasing willingness to proactively raise concerns. It is an important part of our commitment to prevent and detect wrongdoing.

For more on incident management at P&G, please see [here](#). You can also contact the Ethics & Compliance Office at [ethicscommittee.im@pg.com](mailto:ethicscommittee.im@pg.com). If your question concerns processing of your personal data, you can contact [corporateprivacy.im@pg.com](mailto:corporateprivacy.im@pg.com). If you have questions or concerns about a pending investigation, please contact the investigator directly.

### **Note for the European Union**

Participants in the incident management process within the EU may have additional procedural steps available to them. If you are interested in learning more about these steps, please contact [compliance.im@pg.com](mailto:compliance.im@pg.com) or your local Human Resources country leader.