Keep Building Better: The Meta Code of Conduct

A foundation for making a positive impact

∞ Meta

Contents

Meta Code of Conduct: Helping us to keep building better

Meta is built to accomplish an important mission: to give people the power to build community and bring the world closer together.

Our reach and influence require that we commit and hold ourselves accountable to a high standard, ensuring that we build products and programs that have a positive impact, keep people safe and serve everyone.

The Code of Conduct is our foundation. It helps to empower everyone who works at Meta to understand the responsibilities we have. It explains some of the legal rules we must abide by as well as the high standard we hold ourselves to. While it does not cover every situation you may face in your daily work, the Code of Conduct should be your first stop when you face an unclear or difficult decision.

A message from Mark Zuckerberg

At Meta, we build products and experiences to give people the power to build community and bring the world closer together.

With that comes a deep responsibility to each other, to the communities we serve and to the world. I believe that embracing this responsibility allows us to innovate better—and be a better company.

This Code of Conduct defines the expectations we have for how we act and how we make decisions. We should look to it when we have questions or face difficult trade-offs and gray areas.

The importance of our work means we must all commit to holding ourselves to a high standard. This is why I expect everyone at Meta—leaders, managers, individual contributors—to follow our Code of Conduct, advocate for others to do the same, and feel empowered to speak up if you need help or have questions.

Let's use this Code of Conduct to keep building better, together.

Thank you,
Mark

Our principles are foundational to Meta

The Code of Conduct is built on our principles, which are beliefs that we hold deeply and represent what we stand for. They help guide how we make decisions every day.

Five principles guide our work at Meta:

1 Give people a voice—we build products and programs so everyone can use their voice—to tell their stories, to share, to connect, to be heard and to change their lives for the better.

2 Build connection and community—because we believe in the potential of people when they can come together, we are committed to helping people connect.

3 Serve everyone—if you believe in the potential of people, you need to make sure you provide the same opportunities to everyone.

4 Keep people safe and protect privacy—we are committed to protecting our communities from harm.

5 Promote economic opportunity—people use our tools every day to come together to unlock potential and drive economic opportunity in their own lives, within their communities and for their organizations.

We are all expected to uphold the Code of Conduct

This Code is at the center of how we work together and build impact in the world, and how we are held accountable for living our principles—it's important.

All Meta Personnel—from leaders to interns—must abide by and uphold the Code. Violations may result in disciplinary action, up to and including termination of employment or assignment.

The Code applies to:

✓ AUDIENCE	✓ DEFINITION	✓ TERMINOLOGY USED THROUGHOUT THE CODE
Meta	All of Meta, including all subsidiaries and affiliates worldwide (e.g., FB Ireland, Instagram, WhatsApp, etc.)	Meta Company
Meta Personnel	Members of the Board of Directors, officers, and employees of Meta, as well as contingent workers (including vendor workers, contractors, consultants)	Meta Personnel "We"/"Us"/"Our" "Each Other"

Requirements of Meta Personnel

All Meta Personnel are required to:

✓ Act in accordance with Meta principles and follow the requirements of this Code and Company policies.

✓ Act lawfully, honestly, ethically and in the best interests of Meta and our Meta users at all times.

✓ Complete required training, use the Code of Conduct and speak up when you have a question or concern.

✓ Cooperate with Company investigations.

✓ Never retaliate against anyone who raises a concern in good faith about a possible violation of the Code, Meta policies or the law, or who cooperates in an investigation.

Further, those who lead or manage Meta Personnel are required to:

✓ Lead by example, recognizing that our behaviors and decisions influence others, including by championing the importance of abiding by the Code of Conduct and Company policies.

✓ Promote a positive work environment in which everyone feels included and empowered to do the right thing and speak up when they have ideas or concerns—this means listening to questions and concerns and escalating when needed.

✓ Promptly report potential or known violations of the law, this Code or Company policies to Legal.

Addressing concerns by speaking up and getting help

Your voice matters.

Speaking up is important if you see or suspect a violation of the law, this Code or any of Meta's policies. You don't need to have all the information or details to ask questions or speak up.

You should feel comfortable asking a question or reporting a concern using whatever channel or resource you prefer. You can trust that your question or concern will be treated seriously and dealt with promptly and as confidentially as possible.

You can always raise your concern with:

- Your manager or another manager

- Legal or a member of the Compliance team

- Your Human Resources (HR) Business Partner

- Employee Relations Partner

- Internal Audit

- For privacy-related concerns, the Privacy Report Tool

- For contingent workers, your company's Meta Point of Contact (POC)

- You can also raise a concern anonymously:

  - Via SpeakUp @ Meta by visiting https://fb.integrityline.com

  - Calling +1-877-564-9619

  - Dialing the direct access code available at https://www.business.att.com/collateral/access.html and then +1-877-564-9619 following the operator's instructions

For up-to-date information on available resources and anonymous reporting options, visit the Whistleblower and Complaint Policy.

If you otherwise have questions about the Code, need advice on a particular topic or issue or are unsure about how to report a concern, the Compliance team is always ready to help (legalapproval@).

! What happens next: investigations

When Meta learns about a potential violation of law, this Code or any of Meta's policies, the Company will take action. This often includes conducting a fair, objective and thorough investigation. Meta will make every effort to get all sides of the story in a timely, impartial way and maintain confidentiality to the greatest extent possible and in compliance with applicable laws and regulations.

If we determine that a violation occurred or someone was untruthful in the course of an audit or investigation, we take appropriate action, including disciplinary action up to termination and, if necessary, referral to law enforcement.

! No tolerance for retaliation

Speaking up is not always easy, but it is always the right thing to do and what we expect at Meta. That is why we do not tolerate retaliation against anyone who:

- Raises a concern in good faith about a possible violation of the law, this Code or Company policies, expresses an intent to do so or assists other Meta Personnel in doing so

- Participates in an investigation

Working with the Compliance team at Meta

The Compliance team is a partner to everyone at Meta for navigating the complexities of today and anticipating those coming tomorrow.

If you're navigating a gray area where something does not feel right and you're not finding answers in the Code or other policies, do not hesitate to reach out to the Compliance team for support.
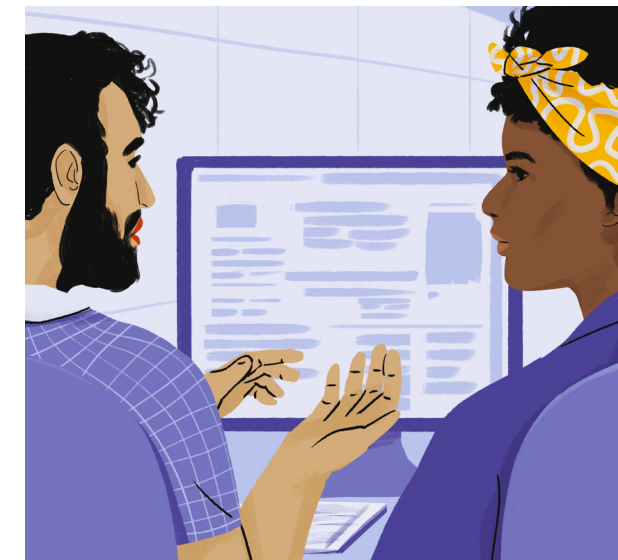
Keep building better with each other

To build connection and community, we first must start by doing the same within our internal community.

In this section:

Embrace diversity and inclusion

We are committed to building a diverse and inclusive workplace in which everyone feels like they belong and are empowered to bring their authentic self to work.

Doing so allows them to freely contribute their talents, ideas and perspectives. We can leverage our collective cognitive diversity to build the best products, make the best decisions for the global community we serve, and create meaningful experiences for everyone. Meta identifies and implements programs that will assist in the recruitment, development and retention of a diverse pool of skilled and experienced employees.

Embracing diversity and inclusion means we:

- Strive to promote fairness and equal opportunities for employment and promotion based on qualifications and skills

- Are respectful of the differences between people and their circumstances and do not tolerate discrimination or harassment on the basis of any legally protected characteristics

- Welcome ideas, opinions, and ways of thinking that may be different from our own (known as cognitive diversity) and prohibit exclusionary behaviors, which may include incivility, bullying and workplace violence, discrimination and isolating individuals and groups who are different

- Foster an inclusive and respectful workplace by assessing our conscious and unconscious biases, removing barriers to inclusion, focusing on systemic equity in our people processes and Company procedures for consistency and fairness, being a supportive ally and standing up for others

- Invest in the physical, mental and emotional well-being of our employees through ongoing education around inclusion and diversity initiatives

More guidance:

→ Equal Employment Opportunity Policy

→ Harassment Policy

→ Diversity and Inclusion website

→ Human Rights Policy

Diversity at Meta

Meta strives to build an inclusive workplace where all Meta Personnel feel a sense of belonging and valued for who they are and the differences they bring. Meta prohibits discrimination based on:

- Race, color, ethnic or national origin

- Age

- Religion or religious creed (or belief)

- Sex, including pregnancy, childbirth, breastfeeding, reproductive health decisions or related medical conditions

- Sexual orientation

- Gender, gender identity, gender expression, transgender status or sexual stereotypes

- Nationality, immigration status, citizenship or ancestry

- Marital status

- Protected military or veteran status

- Physical or mental disability, medical condition, genetic information or characteristics (or those of a family member)

- Political views or activity

- Status as a victim of domestic violence, sexual assault or stalking

- Any other basis prohibited under applicable law

Meta's diversity and inclusion strategy

Find

To help us build teams rich in cognitive diversity, we hire highly qualified individuals from the widest range of backgrounds and experiences. This helps us benefit from each other's vast variety of experiences and perspectives and offer products and services truly designed for all.

Grow and keep

From onboarding to managing performance to providing community education programs, we offer consistent support and resources to help people grow—professionally and personally. We help people who work here expand their skill sets—including their capabilities to build inclusive team environments where everyone is seen, heard and valued. Meta, and the tech industry, must be a space where everyone is welcome and has the opportunity to succeed.

Integrate

To build products, develop policies, and best serve people in our global community, we must apply diverse perspectives to everything we do. We leverage the diversity of the people who work at Meta to provide strategic input on our products, policies, programs and practices and apply these learnings to build for all.

Be kind and respectful

We have a responsibility to create a respectful and inclusive community, which is shaped by the experiences people have working at Meta every day.

It is important that Meta Personnel feel valued and respected and that they are treated fairly. Sharing, providing feedback, debating and questioning, all with kindness, respect and humor are core to our culture and key to our mission. This culture helps establish the openness and trust we need to make informed decisions and have a meaningful impact in the world. Meta does not tolerate harassment, discrimination, threats, bullying or any similar behavior against anyone.

Being kind and respectful means we:

- Treat every person within our community with respect, regardless of role, position, employment status or tenure

- Consider the needs and perspectives of others and how our words and actions might be received

- Never threaten, act violently toward or harass others, including sexually

- Don't insult, bully, disparage, shame or mock others and stay vigilant for signs that others are being harassed or bullied

- Do not retaliate against others—everyone should foster a culture in which anyone can comfortably raise a concern without fear

- Speak up about anything that may violate Meta's respectful work environment policies (remember, managers are required to promptly report (ideally, within 24 hours) actual or potential violations of the Harassment Policy)

More guidance:

→ Harassment Policy

→ Meta Whistleblower and Complaint Policy

→ Respectful Communications Policy

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What is harassment?

Harassment is conduct, connected to a protected characteristic, that creates a disrespectful, intimidating, hostile, degrading, humiliating or offensive environment. It is never tolerated at Meta. Remember: harassment is about impact—how others perceive an action, not intent. For example, it can be:

✓ **What a person says or writes**, including slurs, jokes, or stereotyping as well as threatening, loud or abusive language or behavior, based on protected characteristics such as race, sexual orientation or gender;

✓ **What a person does**, such as unwelcome touching, making sexual advances, blocking someone's walking path, ignoring someone or deliberately humiliating someone; or

✓ **What a person displays**, such as displaying lewd photos or derogatory slogans in the workplace or sharing them electronically. This also includes sharing discriminatory or inappropriate posts about someone with someone else.

Q:
My new manager is outgoing and inquisitive. They may think they're being friendly, but their probing questions about my personal life make me feel uncomfortable. In our first 1:1 they asked me whether I was married and had children. I assumed they were trying to get to know me better and build our relationship, but in my culture, it is not common to discuss your personal life with colleagues. I avoided their question, but at a recent team social they asked me again in front of a group. I responded that I prefer not to discuss my personal life at work. They said, "If you're so uptight, you might not be a good fit for this team. You're in the US now and we just want to get to know you a little better." I told the team about my family circumstances but was really embarrassed by the comment my manager made. What can I do?

A:
While your manager may have had good intent, you should not be made to feel uncomfortable or embarrassed, particularly after making it clear that you don't want to discuss your personal life. There is no place for this at Meta. We focus on the impact of a comment or action rather than the intent. Reach out to your HR Business Partner or Employee Relations Partner, or contact SpeakUp, to discuss your concerns further. Any of these options will enable us to help resolve the issue. You will be protected from any retaliation.

Create a secure work environment

Wherever we may be working, we are mindful of our security and healthy work practices so that we and those around us can thrive.

Whether working in an office, commuting to work, at home, in labs, at data centers or out in the world, nothing is more important than staying safe and healthy. We care about each other's well-being; we want to create conditions in which we are free from harm and free to do our best work.

Creating a secure work environment means we:

- Follow applicable environmental, health and safety policies, guidelines and laws

- Protect the environment and the communities in which we operate and conduct business

- Do not work under the influence of illegal drugs, controlled substances, or any other substance that could compromise safety or performance

- Do not feel pressured or pressure others to consume alcohol at work events or with work colleagues

- If you do consume alcohol at a work event, please do so responsibly

- Comply with all Company policies related to physical security, including visitors, access to facilities and use of Meta Personnel badges

More guidance:

→ Visitor Policy

→ Global Environmental, Health, and Safety Wiki

→ Drug-Free Workplace Policy

Q:

A group of my friends is coming to visit my building for an office tour. My friends asked if they could take pictures and videos while they are on-site. Also, while I was escorting them into the building, I held the door for someone without a badge who was not with my group. Is this allowed?

A:

Visitors can take photos or videos outside, in the cafés, in the lobbies, in areas set up for photo moments (such as mini rooms) and in front of the living Facebook Wall, provided confidential information isn't visible.

Visitors cannot take pictures or videos in Meta workspaces, in conference rooms, or near laptops or whiteboards. We do not want confidential information shared externally or posted publicly without our consent or knowledge. Separately, when inviting visitors into Meta offices, only escort your registered guests—while it may feel kind to hold the door for others, this practice opens us up to security and safety issues.

Q:

I am worried about my coworker. I have always known him to be outgoing, reliable and a great team player. The past couple of months, however, he has not seemed himself: he is withdrawn, erratic and hostile at times and he has missed important deadlines. How can I make sure he's okay while also looking out for the team?

A:

We care about our people and their physical and mental well-being. Situations like this should be handled with great sensitivity, and you should connect with your HR Business Partner or Employee Relations Partner before taking any next steps. If you're concerned he may pose a risk of harm to himself or others, you should contact GSOC immediately.

Be loyal and transparent

We avoid conflicts of interest to make the best choices for Meta, unaffected by personal interests or relationships.

All of us have personal interests that make us unique and allow us to bring value to Meta. Even so, we put Meta first when we come to work or represent Meta. We must always use our best judgment and avoid situations where our personal interests and relationships might interfere or appear to interfere with the best interests of Meta.

Note: Meta's Board of Directors may from time to time adopt separate policies with respect to directors' conflicts of interest in order to address the particular circumstances arising from their role as members of the board. Any such policy will supersede the conflicts of interest guidelines above to the extent applicable.

More guidance:
⊖ Conflicts of Interest Policy   ⊖ Conflicts Online Tool
⊖ Conflicts FAQ

Being loyal and transparent means we:

- Recognize that Meta's business is both broad in scope and constantly changing, which means the definition of a conflict of interest is also constantly changing.

- Avoid making a conflict-of-interest determination on our own. When it comes to outside activities, we should review the additional guidance available on conflicts below, discuss the circumstances with our manager and then submit a conflict review request via the online tool to the Conflicts Committee. Before you begin any of these opportunities, obtain approval using the conflicts online tool.

- Do not allow any of our personal connections or family members to receive a personal benefit from our position at Meta or improperly influence, or give the appearance of improperly influencing, our decision-making.

- Give our best effort at work every day, not allowing outside jobs to hinder our contributions to the business.

- Are mindful that business opportunities discovered using Meta property, information or our position should not be used for personal gain.

- Proactively identify situations that could put Meta's interests into possible conflict with our own.

- Promptly disclose actual, potential or perceived conflicts of interest via the online tool.

- Refrain from engaging in a disclosed conflict of interest while the request is being evaluated.

- Are aware that interns and contingent workers may have different processes and requirements for conflicts of interest; please discuss with your manager if there are any concerns.

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Do I have a conflict of interest?

Conflicts may arise when we, or in some instances our close family members, have business, financial or close personal relationships with our current, former or potential:

✓ **Customers and suppliers**

✓ **Regulators**

✓ **Current or potential competitors and other third parties**

✓ **Beneficiaries of a company's grant or donation**

✓ **Meta Personnel**

Here are some examples of situations in which an actual, potential or perceived conflict of interest might arise and must be disclosed:

- Former employment with the government, a competitor, supplier or customer;

- Directly or indirectly supervising a family member, close friend or intimate partner at Meta or where they are employed by a Meta supplier or partner;

- Hiring or engaging the services of businesses owned by or affiliated with Meta Personnel;

- Any outside employment, business, advising or consulting relationship with another company;

- Teaching engagements;

- Holding political office;

- Investments in more than 2% of the total outstanding shares of a publicly traded company;

- Investments in private companies that are current or potential competitors of Meta or have a business relationship with Meta;

- Serving as an advisor to a venture capital fund's portfolio companies or advising on the fund's investment activities;

- Serving as a member of a non-Meta board of directors (nonprofit and for-profit) or advisory board of a company or educational institution

I'm concerned I may have a conflict of interest—what should I do?

1 Discuss your potential conflict with your manager or ask the Compliance team for guidance.

2 If you think a personal interest or activity may interfere, or have the appearance of interfering, with Meta's interests, you are required to complete and submit a conflict review request via the online tool—be sure to provide all requested information.

3 Your manager or the Conflicts Committee will review your request and follow up on any next steps.

4 If an outside engagement is approved and requires a formal agreement, a Services Agreement Addendum may be required.

Failure to submit a conflict review request or to adhere to the guidance provided by the Conflicts Committee could result in disciplinary action, up to and including termination.

Protect Meta's confidential information

We do not improperly use or disclose confidential business information.

Disclosing (or "leaking") confidential information outside of Meta or to those who do not need it for legitimate business purposes can have dire consequences on Meta's business. For example, leaks could expose Meta to liability or give away product strategies to competitors; they could also result in lawsuits or undermine the work, or even safety, of our colleagues. Sharing Meta's confidential information with external parties or beyond those of us internally who legitimately need to know such information could also seriously damage Meta's reputation and breach the trust of others, including people who use Meta services, our colleagues, third parties and the community.

Protecting Meta's confidential information means we:

- Understand how Meta defines confidential information in the Company's policies

- Do not disclose confidential, proprietary, competitive or other sensitive information to a third party unless there is an approved purpose under a nondisclosure agreement (NDA) or other agreement as appropriate

- Do not share confidential information internally beyond those who need it for their job

- Comply with terms of NDAs or applicable agreements when dealing with third-party confidential information, including obtaining express written consent if asked to share third-party confidential information with another third party

- Do not bring or share any confidential proprietary information belonging to a former employer or entity to Meta

- Do not take any Meta confidential information with us if we leave Meta, and return it if we inadvertently do

- Promptly forward all press and media inquiries to Press@, and only speak to the media if explicitly authorized by the Comms team

- Understand our obligations under our employment agreement

More guidance:
- → Press@
- → Data Handling Guidelines
- → Data Classification Standard
- → Data Sharing Standard

What are examples of confidential information?

Below are some examples of confidential information at Meta. If you are unsure if something would be considered confidential information, assume it is confidential and ask Legal for additional guidance or consult your CIIAA/Confidentiality Agreements for additional guidance.

- Proprietary data
- Trade secrets
- Product plans
- Inventions
- Laboratory notebooks
- Processes
- Designs
- Drawings
- Technical or engineering specifications

- Meta User data
- Customer or Supplier lists
- Meta Personnel data (other than your own)
- Prototypes
- Hardware
- Financial information
- Budgets
- Pricing

- Business plans or other business information
- Internal conversations regarding content decisions
- The identities of specific employees or contingent workers who are involved in content review processes

Q:
I am a Meta sales manager. A prospective e-commerce client has followed up after an introductory meeting. The prospective client is asking me to provide data that will convince his CEO to increase advertising spend, including data found with Meta. He requests data found in the public domain and data from our existing e-commerce clients that demonstrates how those clients have achieved success by increasing their advertising spend. This would be a huge win for my team so I think it would be okay to provide the data.

A:
Advancing Meta's business and relationships is important. However, we need to remember the importance of protecting confidential information. In this case, nonpublic, confidential information about Meta and other e-commerce clients might be at risk if shared. Without specific authorization and a nondisclosure agreement in place, data that is not in the public domain cannot be shared.

Leaks hurt all of us.

Whether intentional or unintentional, leaks of confidential information damage the Company's ability to confidently share information internally, which is a fundamental part of Meta culture and key to the Company's success.

Note: A "leak" does not include communicating directly with or providing documents to a government agency regarding a possible legal violation, even if not disclosed to Meta. Anyone raising such a concern is protected from retaliation.

!

Do not share internal confidential information externally or internally outside of people whose job requires it. For example:

- Confidential and/or proprietary information shared in Internal Q&As, Workplace posts and All Hands
- Screenshots of new products
- Hints about launches or unreleased features to friends, family, bloggers or former Meta Personnel
- Financial performance and results
- Potential mergers, acquisitions or partnerships
- Direct all press inquiries to Press@

!

Accidental or inadvertent sharing of confidential information is still considered a leak.
Our internal rule of "assume good intent" doesn't apply here. It's still contrary to the obligations we owe to Meta when someone shares confidential information externally or internally beyond those who strictly need to know, even if it is done accidentally or in good faith.

Regardless of the motivations, every leak of confidential information is treated extremely seriously.

!

Be aware of your surroundings.
Your badge, vintage swag or even your new laptop stickers may identify your work for Meta, especially near our offices. Be aware of your surroundings when working outside of the office or at home to prevent inadvertent leaks of confidential information.

- Don't have confidential work conversations in public places.
- If you want to work in a public setting—for example, on a plane or train, in a park, or at a coffee shop—always use a privacy screen on your computer.
- When working from home, take care not to reveal sensitive or confidential information in front of anyone.

Even at our campuses and in our buildings, we need to be cautious. Visitors could be present and hear and see things that are meant to be kept confidential and internal.

Safeguard Meta's assets

We responsibly use and protect Meta's assets and resources, so we can create real value for the world.

We must all be good stewards of Meta's assets, whether physical, data, financial, technical or intellectual. Meta's success continues to be built around open innovation, collaboration and discovery. Meta's ability to move fast and innovate depends on protecting the property, information and ideas that power our progress.

Safeguarding Meta's assets means we:

- Follow established guidelines, based on the asset type and business strategy, to protect Meta intellectual property (IP) and all confidential information

- Respect the IP rights and confidential information of everyone, including third parties, Meta Personnel, competitors, and users

- Use Meta's assets and resources with care and for legitimate business purposes—assets should not be stolen, wasted or used for personal gain

- Follow Meta policies and guidelines when using Meta's assets and resources for personal use

- Maintain the security of Meta-provided technologies and personal devices used for Meta business

- Comply with all applicable laws, regulations and Meta policies concerning record-keeping and records retention

- Report any signs of fraud or abuse in connection with Meta's assets

More guidance:
→ Information Security Policy
→ Acceptable Use Policy
→ Data Handling Guidelines

→ FTC Order Records Management Policy
→ FTC Order Records Retention Schedule
→ General Guidelines for Handling Intellectual Property and Confidential Information

Q:

I just started working at Meta. At my previous employer, I was working on an open-source project and would like to continue doing so. What do I need to know about Meta's approach to IP and open-source innovation?

A:

Meta invests heavily in all aspects of IP development to enable our continued success, both as an innovator and as a contributor to the global community. Meta continues to innovate openly whenever possible (open-source, publications, etc.) as a means to unlock the potential of open collaboration and discovery, advance the state of innovation globally and provide equitable access to technology.

The decision of whether to openly innovate is based on the particular business strategy and type of IP, not at the discretion of the individual employee.

To maximize the impact of our IP development, each employee has an important role in understanding and following established guidelines, which can be found on the Patents wiki page.

Q:

I've been involved in a dispute around the departure of one of my former employees. We had a hard time locating some of her employment records. I don't know if the dispute has been resolved so I am keeping her employment records in a folder on my computer. I know that we have record retention guidelines and that we are supposed to delete certain records after a period of time. I'm not sure what to do?

A:

Unless you have received a Legal Hold, it's appropriate to follow our retention policies and potentially delete the records. Keeping records for too long can put sensitive or confidential information at risk of being accessed and misused. We may also have a legal obligation to delete information that is no longer needed, like personal data or confidential information from a business partner. By retaining records according to our defined schedules, you strengthen our records management program and protect Meta. Follow all legal hold instructions for retaining records relating to ongoing litigation or other disputes. If you are unsure what to do, you should contact our eDiscovery and Information Governance team (infogov@) for guidance.

Did you know?
Our eDiscovery and Information Governance team is the go-to resource for records retention and legal holds. Generally, the following types of documents, among others, may be subject to records retention and legal hold laws and regulations:

- Email and other electronic communications, including on Workplace, WhatsApp and other messaging apps
- Information published on the Wiki or other internal reference or knowledge sharing platforms
- Documents stored on hard drives or in cloud repositories, including Google Docs, SharePoint, OneDrive and Dropbox
- Data stored in structured and semi-structured repositories, including Hive

Keep building better for those we empower

Building for those who use Meta products and services means giving people a voice, protecting privacy and keeping people safe.

In this section:

Honor people's privacy in everything we do

Privacy matters to us. Honoring it in everything we do enables us to maintain trust with each other and with Meta users, and allows us to comply with our legal obligations.

Whether we're building new products, improving experiences or managing a third party, everyone needs to understand and honor Meta privacy obligations and the reasonable privacy expectations of individuals. Committing to privacy means embedding accountability, designing with privacy in mind and innovation into everything we do and ensuring that we continue to safeguard the privacy and security of the data we are entrusted with. We learn from our experiences and understand we are not the same company as when we started. We continue to enhance, transform and embrace privacy in all our work.

Honoring people's privacy means we:

- Understand and follow Meta privacy practices and policies, including the Internal Privacy Policy

- Are mindful as a company of the ways we collect, use, share and store people's personal data and information in our products and operations—and how we handle and protect it once we have it

- Design with privacy in mind, which in part, means giving people choices about the data we have collected or created about them, including access to and control of their data whenever possible and appropriate and honor the choices they have made

- Collect, create, access and use only the minimum amount of data we need to support clearly stated purposes—we have zero tolerance for inappropriate access to data

- Initiate Privacy Reviews (and obtain a Privacy Decision) prior to collecting, using, sharing, modifying or speaking publicly about data or privacy as required

- Properly respond to events that undermine the confidentiality, integrity, or availability of data for which Meta is responsible

- Regularly evaluate the Company's privacy practices to ensure that we are meeting our own, our stakeholders' and our regulators' expectations

More guidance:

→ Privacy Programs

→ Internal Privacy Policy

Q:

I am a Meta contingent worker in a sales role. My friend Tom is the administrator of a Facebook page for a barbershop chorus. Tom reached out to me because a video of one of his performances was taken down, and Tom doesn't understand why. Tom gave me his sign-in credentials and asked me if I could log in as him to assess the problem and use internal tools to restore the content. Since Tom's video has nothing to do with my work, is it okay if I restore his content?

A:

You should not use another person's credentials to log into their account or work on a friend's account. You are accessing user data that was not relevant for your job. In addition, you restored content that had been removed.

It is okay to talk about Meta with friends, but you may not access user data of people you know. If a friend or family member is having an issue with a Facebook or Instagram account that belongs to them, you can submit a form to fburl.com/oops to get support. Meta has zero tolerance for inappropriate access to user data.

Q:

I recently transferred to a new team. My new manager sent a request to IT for the additional system access permissions that I will need for my new job. What should I do with the access permissions from my prior role and team?

A:

You should notify IT or your manager that you still have your old permissions. You should not keep access to systems and applications that are not required for your new role. Keeping access could mean that you can view confidential information that you no longer have a business need to view.

Both you and your manager have a responsibility to discuss existing and new access permissions to determine what is needed.

It is important that Meta Personnel have access only to data that is necessary for the performance of their current job responsibilities.

"Privacy is personal—there isn't one, clear expectation of privacy. People have different understandings and expectations of privacy, but they are equally important. At Meta, we have the responsibility to—and the challenge of—honoring people's diverse perspectives, backgrounds and experiences as we build for privacy."

– MICHEL PROTTI,
Chief Privacy Officer

Innovate responsibly

Meta is committed to maximizing the positive impact we have on people and society through all that we build.

As we reach more people and continue to build new products and programs, the need to create responsible products grows broader and more complex. It is not enough to just innovate. We are all expected to innovate responsibly by making every effort to anticipate and mitigate potential harms in all that we build.
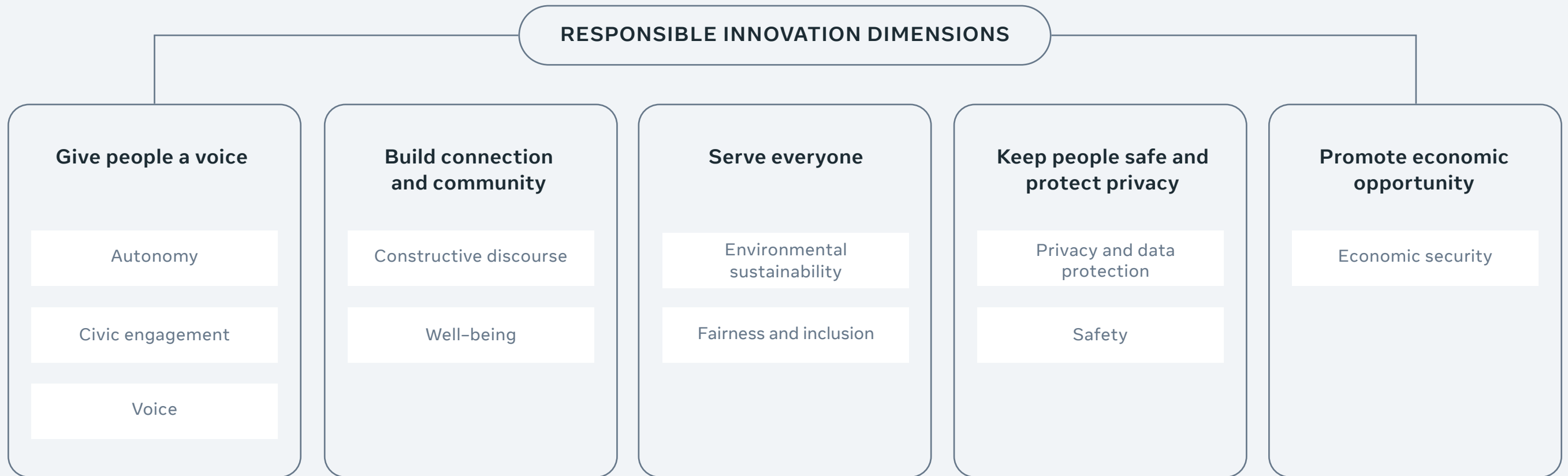
Innovating responsibly means we:

- Consider a broad range of potential impacts on people, communities and society, looking across different dimensions of responsibility, such as inclusion, safety, privacy and others

- Raise and address potential harms early and often throughout the product development process

- Seek out expert voices, diverse perspectives and the resources and tools we have at Meta to inform our decisions

- Engage in necessary reviews, such as Privacy Review and Integrity XFN review

- Design and build products that prioritize safety and privacy

- Work quickly to identify and remove harmful content from Meta platforms, such as hate speech, harassment, child exploitation, threats of violence and terrorism

- Use and access internal tools with care and caution, only as necessary to do our job and never for personal gain or to assist a user in avoiding detection or penalty—Meta has a zero tolerance for inappropriate use or access of internal tools

- Design and build products that prioritize safety, privacy, provide appropriate warnings where necessary and articulate instructions for safe and responsible use

More guidance:

→ Responsible Innovation Wiki

→ Meta Reality Labs Responsible Innovation

→ User Data Access Policy

The Responsible Innovation Dimensions are an evolving set of elements that individuals, communities and society need to thrive, and which Meta platforms need to protect. These Responsible Innovation Dimensions provide a framework for Meta employees to adopt a more holistic approach to proactively identifying and mitigating potential harms throughout the product development process. The Responsible Innovation team can help you with this through office hours, workshops, guidance documents, tools and more.

RESPONSIBLE INNOVATION DIMENSIONS

Give people a voice	Build connection and community	Serve everyone	Keep people safe and protect privacy	Promote economic opportunity
Autonomy	Constructive discourse	Environmental sustainability	Privacy and data protection	Economic security
Civic engagement	Well–being	Fairness and inclusion	Safety	
Voice				

Did you know?

Safety is one of our responsible innovation dimensions.
We have specific teams that partner with external organizations and government agencies to help keep people safe. For instance, we have a legal obligation to report to the National Center for Missing and Exploited Children any apparent violation of laws pertaining to child exploitation imagery. We have teams that are specially trained to review, escalate and report this content, which must be done in a secure manner exposing the fewest people to this material.

Note: If you come across this material, do not download it, forward it or share it.

" As technologists, we are all stewards of some of the most powerful communication tools ever created. These tools have generated a lot of good in the world, but their very power requires a deep sense of responsibility and a commitment to making the most ethically responsible decisions possible, every day."

– MARGARET STEWART,
 VP, Product Design

Safeguard the payment platform

We help the world move money, shop, and donate conveniently and securely, and we must do our part to prevent criminal activity.

We are committed to providing people a convenient, secure and consistent payment experience. We know that criminals and other bad actors target online payment platforms to perpetrate illegal activity, such as money laundering and terrorist financing. We also are required to comply with financial sanctions regimes. As we operate regulated payment platforms, we are required by law to stay vigilant, verify the identity of customers and protect them by carefully monitoring for fraud and suspicious behavior. We also provide transparency through customer notices and timely resolve complaints and disputes.

Safeguarding the payment platform means we:

- Understand and follow the Company's policies, procedures and internal controls that are designed to prevent bad actors from utilizing payment platforms to launder money and engage in other illegal activity

- Keep an eye out for suspicious payment activities, such as reluctance to provide complete information or unusual links between games players and developers, donors and charities, or person-to-person payments, and escalate red flags and suspicious activity to Compliance

- Take responsibility for verifying customers' identity—referred to as "know your customers"—so we are aware of who is using Meta products

- Maintain confidentiality when investigating and reporting suspicious activity and respect that data relating to payments may not be freely shared across Meta

More guidance:
→ Payments Compliance
→ Novi Enterprise Risk and Compliance

What is money laundering?

It generally refers to financial transactions in which criminals, including criminal organizations, attempt to disguise the proceeds, sources or nature of their illicit activities. Terrorist financing (any type of financial support for a terrorist organization, whether from illicit activity or not) also can be linked to money laundering. Examples of relevant laws include the Bank Secrecy Act (BSA) in the United States and Ireland's Criminal Justice (Money Laundering and Terrorist Financing) Act.

How does this apply to Meta?

We allow person-to-person payments (or p2p), some in-game and Facebook Marketplace purchases and donations, and we have a digital currency wallet, which are all subject to monitoring for money laundering.
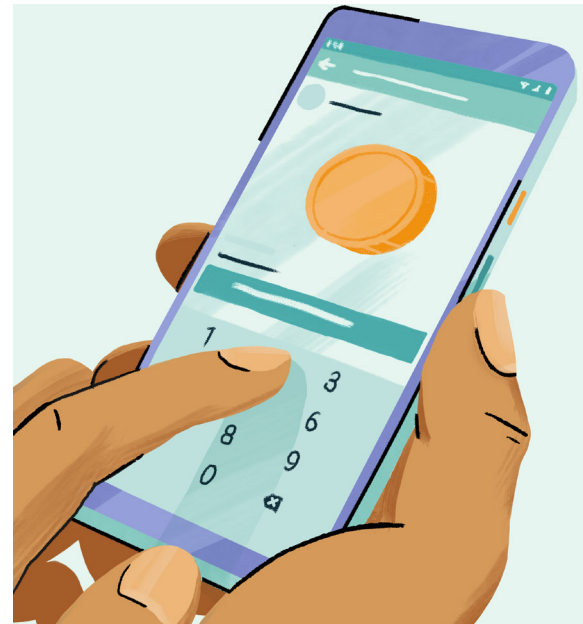
Money laundering red flags

We must always be on the lookout for signs of suspicious activity or transactions. Some examples include:

Transactions that don't fit a user's normal profile
A user who typically conducts only a few small transactions a month (and always with friends) suddenly makes a large payment to a new Meta user

Frequent changes in account information
Such as name, contact information or payout details

Unusual charity donation patterns
A charity that shows a higher level of activity than is normal in donations or a single donor who makes repeated donations over a short period of time

Signs of criminal activity on Meta platforms
The sale of drugs or weapons

Keep building better with our partners

Meta's technologies promote economic opportunity and level the playing field. We, too, can only build better if we compete and collaborate fairly.

In this section:

Follow global trade laws

With offices, people and facilities in numerous countries worldwide, Meta is committed to complying with and respecting global export, import and sanctions laws.

We are proud to serve more than three billion people across many countries and cultures and in dozens of languages. We move hardware, software and technology to and from various countries. We also transact with customers, suppliers, entities and individuals all over the globe. This means we have a duty to respect applicable customs, trade and sanctions laws and regulations where we serve.

Following global trade laws means we:

- Appropriately screen individuals, companies and countries to ensure we do not violate applicable sanctions or trade restrictions

- Comply with all applicable international trade and antiboycott laws and regulations, including those relating to the import and export of goods, services and technical data to and from the United States and other countries

- Raise a concern to Trade Legal if we believe there may be an inappropriate import or export of technical data or hardware

- Check in by consulting with the global trade Wiki or contacting the Trade Legal team before engaging with sanctioned or embargoed countries and parties

More guidance:
→ Global Trade Compliance Policy
→ Trade Compliance Operations Wiki
→ Travel to Sanctioned Countries Wiki
→ International Hand-Carry Wiki
→ TradeLegal@

What do I need to look out for?

These activities could present sanctions and/or trade risk:

✓ Business and supplier partnerships

✓ International shipping and transfers of technology

✓ Market research

✓ Hiring decisions

✓ Payments to sanctioned countries or parties

✓ Boycott requests that are not authorized by U.S. law

✓ Obtaining goods and services

Q:
I am traveling to a country subject to comprehensive sanctions to attend a wedding. My team is under a strict deadline to finish a project and I would like to work while I am there. Can I bring my Meta-issued laptop with me?

A:
When traveling to a country subject to comprehensive national and international trade sanctions, advance approval from Compliance is required. This applies to any transactions or activities involving sanctioned countries or restricted parties, as well as approval to travel to a sanctioned country with a company-owned or managed device.

Compete vigorously and fairly

We succeed by competing with other businesses on the quality of our products and services.

Competition makes us a better, more innovative company. Competition laws, also known as antitrust laws, ensure that companies don't unreasonably restrict competition or use market power in ways that harm competition. Complying with competition laws helps us avoid investigations, lawsuits, fines, restrictions and even criminal penalties.

Competing fairly means that we:

- Make business decisions independently from our competitors, not in agreement or collaboration with them

- Never agree, either directly or indirectly, with competitors:
  - To set any aspect of prices or other terms related to the products or services we provide to third parties
  - To allocate customers, advertisers, territories or product markets
  - To refrain from dealing with a particular company (called a "group boycott")
  - On bid levels or whether to submit a bid on any prospective business
  - To refrain from either (i) recruiting or hiring their (or anyone else's) employees or (ii) competing on salary or other terms of employment

- Do not exchange or communicate competitively sensitive information with competitors, unless approved in advance by Legal
  - Competitively sensitive information includes information that is proprietary, confidential or non-public and that is related to an individual company's operations or relationships with users or other third parties

More guidance:

→ Competition Compliance Policy

What do I need to look out for?

The below examples could raise competition-related legal issues in certain circumstances. As this area of law and the relevant issues can be complex, seek advice from Legal before engaging in the following activities:

- Making any exclusive arrangement in which Meta requires a customer to enter into an agreement with Meta and no other competitors

- Making the sale (or price) of one product/service contingent on the customer purchasing another product/service (also called "tying")

- Attempting to establish the price at which a reseller of a Meta product resells those products

- Terminating a preexisting relationship that is important to the other party without a valid business justification

- Deprecating a Meta product or service that third parties rely on to carry out their business, such that they may be substantially impacted if they are no longer able to access or use the Meta product or service

- Taking any action that someone might perceive as Meta not competing fairly or giving Meta an unfair advantage not available to third parties

Collaborate responsibly with third parties

We seek to engage with trustworthy third parties who can help us achieve our goals and work collaboratively to innovate and create social and economic value.

Our external partners, such as suppliers, and vendors, provide goods and services to help us achieve Meta's mission. We choose third parties based on merit and a mutual passion for building social value and bringing the world closer together. The impossible is possible when we work with third parties who reflect the diversity of the people and communities we serve, and whose principles and values align with ours.

Collaborating responsibly with third parties means we:

- Perform risk reviews on third parties and obtain proper approvals prior to engagement to ensure they are trustworthy, qualified, reputable and accountable

- Seek to engage only with third parties that align with Meta's mission and values

- Aim to source and partner responsibly by requiring third parties to adhere to Meta's expectations, such as the Responsible Business Alliance (RBA) standards, supplier diversity expectations, privacy and security requirements, working conditions and sustainability in order to build safe, resilient, diverse and economically empowered communities

- Source through competitive bidding processes and approved agreements

More guidance:
- → Anti-Corruption Policy
- → Contract Policy
- → Outsourcing Policy
- → Vendor Security Reviews
- → Supplier Diversity
- → Third Party Risk Management Policy

Q:
I am currently involved in a request for proposal (RFP) and four suppliers have responded. One of the four has a significantly lower price but doesn't quite match up to the other suppliers in terms of capabilities. Am I obligated to select the supplier with the lowest price?

A:
There are many important considerations when selecting a supplier, and price is one of them. At Meta, in addition to price, many other factors go into an RFP decision. These may include but are not limited to the supplier's capacity, safety, quality, resources, technical abilities, diversity, alignment to the expectations of the RBA, compliance program and commitment to Meta's mission and values.

Did you know?
Meta launched a Supplier Diversity program in October 2016 to help diverse suppliers do business with us and with the people and communities that Meta connects. The vision of the program is to transform the way diverse suppliers connect to customers and each other and develop the tools and resources to grow.

Since the program's launch, Meta has spent more than $1.1 billion with U.S. companies certified as minority, women, veteran, LGBTQ+ or disabled-owned.

In addition to Meta's own collaboration with diverse suppliers, it is our expectation that suppliers who partner with Meta share these values and source goods and services from diverse suppliers wherever possible.

Sourcing responsibly

At Meta, we expect our suppliers to:

Challenge the status quo and drive innovation through quality, delivery, safety and cost

Conduct operations in a professional and respectful manner and share our commitment to ethical business practices like honoring privacy and avoiding conflicts of interest and insider trading

Respond timely to information requests or audits

Ensure that personnel take mandatory trainings to ensure compliance with applicable policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements

Keep building better with the world

It is important to build trust with society, governments, regulators and local communities, and we all have a responsibility to do so. This is how we can truly build better and serve everyone.

In this section:

Lead with financial integrity

We create and maintain accurate financial and business records, so that we and others in the market can rely on trusted and timely information about Meta's performance and impact.

Accurate, clear and complete records are essential to making the best business decisions, preserving our reputation for financial integrity and meeting our obligations as a public company. Meta, our community, investors, regulators and others rely on the information we provide to understand our financial results and measure our success as a company.

Leading with financial integrity means we:

- Record, maintain and file financial transactions and business records truthfully, accurately, on time and with the appropriate detail, including supporting documentation

- Follow relevant accounting and reporting standards and policies

- Follow all Meta policies and procedures for entering into contracts

- Manage budgets and handle Company financial resources carefully and honestly, including cash, ad coupons and corporate credit cards

- Prevent fraud and misleading representations by carefully checking the truthfulness and accuracy of financial information, such as on expense claims, supplier invoices and operational reports

- Comply with all applicable laws, regulations and Meta policies concerning record-keeping and records retention

More guidance:
- → Global Purchasing Policy
- → Approval Authority Matrix
- → Contract Policy
- → Ad Coupon Policy
- → Anti-Corruption Policy

Q:

The fiscal quarter close is imminent. I am on the Revenue Accounting team and am troubled by a request from a client account team lead. They called me and asked if I could reverse out a portion of the advertising revenue from the current quarter's books and insisted it should be included next quarter. Their explanation was not clear and they seemed reluctant to elaborate. What should I do?

A:

You are right to be concerned. It is critically important that revenue is booked for the correct fiscal period to ensure the accuracy and integrity of Meta's accounts and public financial filings. Ask them to clarify and provide more information. If you are still concerned about whether rebooking the revenue is authorized and proper, escalate your concern to your manager.

Do not engage in insider trading

We do not use or share material non-public information about Meta or other companies for trading purposes because doing so is illegal and would harm Meta's relationships with investors, regulators and the public.

We are committed to protecting information that is entrusted to us, especially material non-public information about Meta or another company, sometimes called "inside" information. For guidance on what constitutes material non-public information and other rules about trading, review our Insider Trading Policy.

Using material non-public information to influence investment decisions, called "insider trading," is illegal because it provides an unfair advantage and distorts the financial markets.

Preventing insider trading means we:

- Never trade stock in Meta or another public company while in possession of material non-public information concerning such stock

- Never give or receive "tips," which is when material non-public information about Meta or any company is passed to someone who is not under a duty to keep the information confidential

- Protect non-public information from leaks and accidental disclosure, inside and outside of Meta, including by being mindful of conversation in public spaces

- Review and comply with Meta's Insider Trading Policy—there are detailed rules to know before trading

- Ask Trading@ if we have doubts or questions—material non-public information is a complex concept and we understand there may be questions

More guidance:
→ Insider Trading Policy
→ Trading Window Calendar
→ Trading@

I want to trade Meta stock. I don't have any material non-public information about Meta. When can I trade?

You can trade Meta stock during our quarterly open trading windows or through an approved 10b5-1 trading plan. Generally, we open the trading window on the second business day after our quarterly earnings release date, and the window typically stays open through the 25th day of the middle month of a quarter, though these dates are subject to change. Before trading, you should review our Insider Trading Policy and Trading Window Calendar on the People Portal.

Communicate openly and transparently

We are thoughtful and responsible in how we connect and communicate with the world.

As Meta Personnel, everything we say and share reflects on us individually and on Meta. Whether we are in a meeting, a café, walking together or communicating online, our words matter. We believe online platforms empower honest, open communication and understand that information travels rapidly and unpredictably. Thus, we should pause before communicating to avoid misunderstandings and allow our authentic voice to be heard.

Communicating openly and transparently means we:

- Are clear, truthful, transparent, courteous and professional in our internal and external communications

- Do not misrepresent or make false and damaging statements about others

- Handle Meta's confidential information appropriately (please see Protect Meta's Confidential Information for more details)

- Make clear when writing social media posts that they are personal opinions, so that we do not lead people to believe we are speaking for or on behalf of Meta, unless we have received permission to do so

- Ensure that our use and preservation of business communications comply with Meta policies

- Focus Company resources on impactful external opportunities by seeking approval for speaking and writing engagements

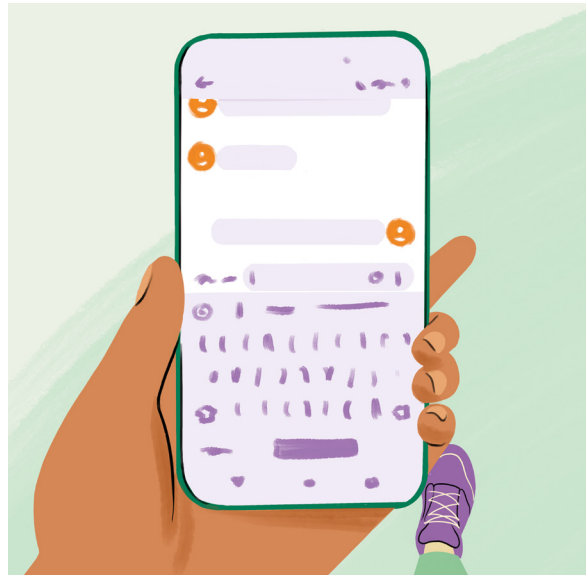- Promptly forward all press and media inquiries addressed to Meta to Press@

More guidance:
→ External Engagements Policy
→ Electronic Communications Guidelines
→ Press@

Always ask yourself these questions before you click **send** or **post** and before you speak:

"How will others feel when they read this?" and "How would I feel if this became public?"

Q:
I am active in online discussion forums about artificial intelligence (AI) where I am widely respected because of my technical expertise. A well-known author and tech industry blogger reached out to me and invited me to be interviewed as part of a blog feature. I am so excited for this interview, but do I need to check with anyone before accepting?

A:
We are proud of Meta colleagues and want to support them in showcasing their talents. Before accepting the invitation, you should submit a request to the External Communications team to determine if this speaking opportunity is appropriate. They will have additional guidance if the opportunity is approved.

Prevent bribery and corruption

We do not engage in bribery or corruption and conduct business throughout the world using ethical practices only.

We stand against all forms of corruption, including offering or accepting bribes, kickbacks and other improper payments. Corruption divides communities, distorts free markets and undermines Meta's commitment to promoting economic opportunity. As a global company, Meta has a responsibility to help eradicate corruption across the world through our actions and example. We will always choose to lose business rather than secure it through a bribe, kickback or improper payment.

Preventing bribery and corruption means we:

- Comply with the letter and spirit of anti-corruption, anti-bribery and anti-kickback laws wherever we do business, including the Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act

- Never offer bribes or kickbacks, or anything of value, to an individual or government official to improperly influence—or if it could appear to improperly influence—a business or government decision

- Refuse all offers of bribes, kickbacks or any other payments or benefits intended to improperly influence how we make decisions at Meta

- Know enough about the people we do business with to determine whether they are government officials

- Properly review and select ethical, trustworthy, qualified third parties and never use them to do anything improper (see Collaborating Responsibly with Third Parties)

- Make hiring decisions based on a candidate's qualifications, knowledge, skills and abilities—never to secure an improper advantage or for an improper reason, such as benefiting a customer or government official

- Maintain accurate books and records (see Lead with Financial Integrity)

More guidance:

→ Anti-Corruption Policy

→ Guidelines for Receiving Gifts and Entertainment

→ Global Travel and Expense Policy

Q:

Meta is planning to open a new data center in a developing market where internet connectivity has expanded rapidly. As the Meta project manager, I am responsible for managing the permitting issues with the local authorities. A local government official explained that he can expedite the permitting process with a small one-time cash payment. Can I make the payment?

A:

The local government official is requesting a facilitation or "grease" payment to expedite the permit. Most anti-corruption laws prohibit even minor facilitation payments— and so does Meta. Do not pay the fee and contact Legal or Compliance immediately for help.

Remember, move fast does not mean move unethically.

Corruption red flags

Meta aims to work only with third parties who share our commitment to ethical business practices. We expect Meta Personnel and our third parties to escalate suspicious activities or red flags to Legal or Compliance. Keep an eye out for the following examples:

Suspicion at onboarding

- Current or past allegations of improper conduct, including improper payments
- Refusal to commit to compliance with anti-bribery laws, including in our contracts
- Refusal to identify business owners, partners or principals
- Family/business ties to a government official in a position to benefit Meta
- Requests to hide identity or that the relationship remain secret
- Listed on a government sanctions list

Giving or receiving improper items of value

- Providing gifts or entertainment to government officials that violate our Anti-Corruption Policy
- Request to donate to a charity to facilitate government action

Compensation/inaccurate books and records:

- Request for commission significantly above market rate or higher than normal fees for services
- Request for substantial up-front payment
- Refuses to properly document expenses or requests to prepare inaccurate invoices, contracts or other documentation
- Inexplicable expenses "off the books"
- Requests for payments in cash, through a third party or to an unrelated account name or location
- Poor internal controls or record-keeping practices

Questionable hiring or referrals

- Request to hire a government official or relative for a position at Meta
- Hiring a contingent worker to help obtain a government contract
- Third party recommended by a government official

Giving and receiving gifts and entertainment

We responsibly invest in our business relationships but never offer or accept gifts, entertainment or anything else of value to improperly influence people.

Showing appreciation for a client or third party strengthens our business relationships when done appropriately. Exchanging gifts, entertainment or hospitality to improperly influence business decisions erodes trust and leads to business outcomes that don't put the community using Meta products and services first.

Giving and receiving gifts and entertainment appropriately means we:

- Offer reasonable and customary gifts, entertainment or anything else of value only where there is a legitimate business purpose and where the gift does not create an appearance of impropriety

- Follow jurisdiction-specific guidelines for offering things of value to government officials and request approval from Compliance where needed

- Entertain (or are entertained by) third parties within reason and in good taste (e.g., reasonable meals or sporting or cultural events are generally acceptable, but skydiving or casinos are generally not), and do not risk creating any perception of inappropriately influencing future decision-making

- Only accept gifts that are valued at less than 200 USD, reasonable, customary and in good taste and that will not appear to inappropriately bias future decision-making

- Do not offer or receive cash, cash equivalents (e.g., gift cards) or loans

- Consult the Anti-Corruption Policy and obtain preapproval from Compliance when required before giving anything of value to government officials

More guidance:

→ Guidelines for Receiving Gifts and Entertainment   → Conflicts FAQ

→ Anti-Corruption Policy

→ Global Travel and Expense Policy

Questions to ask yourself when giving or receiving gifts and entertainment

1 Am I following Meta policies, including the limits for government officials?

2 Is it reasonable and appropriate according to local law and custom?

3 Does it serve a legitimate business purpose?

4 Does it avoid the risk or perception of bias for future decision-making?

5 Does it avoid the perception of improper conduct?

If the answer to any of these questions is "no," the gift or entertainment likely is not appropriate and you should not give or accept it.

Q:
One of my team's suppliers recently sent my team a case of wine out of the blue, without a note. I reached out to the supplier to thank them and get more information about their gift. It turns out the supplier is in the middle of an intense contract negotiation with another Meta team and was hoping I might help find out more about the process. Knowing this, I'm not sure if I should accept the wine.

A:
Although the wine's market value is likely less than 200 USD, receiving it out of the blue while the supplier is bidding for new Meta projects may suggest the supplier hopes you'll influence the decision to select the supplier for this future contract. Since it is not clear that the wine was sent to promote goodwill, reach out to Compliance to discuss before accepting it and distributing it to your team.

Interact with governments and political entities responsibly

We engage constructively and responsibly with governments and political entities to further Meta's mission of bringing the world closer together.

Meta's global reach and continuous innovation mean that we often have to consider newly proposed laws and regulations. We engage thoughtfully, ethically and responsibly with elected officials and regulators to advance Meta's mission and protect the rights of those we empower. We also engage with political parties and candidates to help them use Meta platforms, but we do so neutrally, treating all parties alike, respecting human rights and abiding by our belief that we serve everyone. We also believe Meta Personnel should be able to engage personally in the civic and political process outside of work so long as it is kept separate from Meta.

Interacting with governments and political entities responsibly means we:

- Let colleagues with the necessary experience and authority contact government officials about policy, legislative, regulatory or electoral matters

- Comply with the Company's Anti-Corruption Policy, communicate transparently with government officials and respond to their inquiries in a timely and truthful manner

- Support political parties and their affiliated institutions' use of Meta products neutrally and never show favor toward one party over another

- Comply with rules related to lobbying disclosures and campaign finance limits and disclosures as required in each jurisdiction

- Don't improperly use company resources or time to support your personal political activities

- Make it clear that, when engaging in politics as private citizens, our views and actions are our own, not those of Meta

More guidance:
→ Political Activities and Lobbying Policy
→ Anti-Corruption Policy
→ Respectful Communication Policy

Q:

I am a public policy researcher focused on the regulation of fiber optics. I just learned that my cousin's partner has a new job at the government agency concerned with internet service providers and undersea cables. I decided to ask my cousin for an introduction because I think it will be interesting to learn more about her work and how that might affect Meta. Is this a good idea?

A:

If you engage with your cousin's partner and speak about Meta, it could potentially lead into lobbying, a complex and highly regulated activity. You should consult with Compliance and the Public Policy team for guidance. Compliance can advise on whether local lobbying laws come into play and whether you should steer clear of any work-related conversations. The Public Policy team has the expertise and relationships needed to engage with regulatory agencies.

Build a more caring, sustainable world

We empower people to create a better, more sustainable world through actions, tools and resources that have real-world impact.

As a global company with global influence, we are committed to making a difference—through our own actions and by empowering others. We develop and share solutions for a more sustainable world, and we bring people closer together with social impact tools that foster strong, caring communities.

Building a more caring, sustainable world means we:

- Respect and promote human rights, including supporting better working conditions and prohibiting human trafficking across Meta and Meta supply chains

- Support and invest in organizations that promote social and racial justice

- Commit to achieve net zero greenhouse gas emissions across Meta's global operations and be 100% supported by renewable energy

- Pursue sustainable design principles, standards and certifications in Meta offices and data centers

- Recycle, compost and adopt a limited-waste approach in Meta offices and cafés

- Build tools, like Charitable Giving, Crisis Response and Blood Donations, to enable people to support their interests and passions

- Responsibly promote access to the internet, technology and Meta platforms to everyone around the world

- Foster civically engaged communities by developing tools to help people learn about voting

More guidance:
→ Meta Social Impact
→ Meta Sustainability
→ Charitable Contribution Policy
→ Human Rights Policy

Meta's human rights commitment

Meta has always been about positive social impact. Our commitment to respect human rights helps define and strengthen that impact.

Meta is committed to respecting all globally recognized human rights. These include the right to privacy, freedom of expression and all other rights as defined in the International Bill of Human Rights and set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

We live this commitment through Meta's community standards, our product integrity work and the ways we manage human rights risks, including risks related to arbitrary government takedown requests, supply chain issues, or people misusing our platforms to incite conflict. Our legal, policy, operations and product teams work every day to ensure we respect human rights—and it is tough, important work.

Meta's sustainability commitment

Meta has made commitments to eight areas that impact our individual communities and the world:

1 **Climate**: reduce the Company's operational greenhouse gas emissions by 75% in 2020

2 **Renewable energy**: committed to supporting operations with 100% renewable energy

3 **Water stewardship**: prioritize water stewardship across Meta operations

4 **Innovation**: advance innovative solutions to create a more sustainable world

5 **Collaboration**: partner with others to accelerate action on sustainability issues

6 **Responsible supply chain**: ensure fair working conditions and sustainable environmental practices

7 **Sustainable data centers**: operate some of the most energy efficient data center facilities in the world

8 **Sustainable workplaces**: create sustainable workplaces that advance employee well-being

Other aspects of compliance and the Code of Conduct

Waivers and amendments

In rare circumstances, a waiver of this Code may be sought. Meta's Chief Compliance Officer may grant waivers to Meta personnel other than executive officers or senior financial officers. Any waiver or modification of this Code for a member of Meta's Board of Directors, executive officer or senior financial officer must be approved by the Board of Directors and promptly disclosed as may be required pursuant to applicable laws and regulations, including the rules of the stock exchange on which Meta's common stock is listed for trading. Any amendment of any provision of this Code must be approved by the Compensation, Nominating and Governance Committee of Meta's Board of Directors or, if appropriate, the Audit and Risk Oversight Committee, and promptly disclosed as may be required pursuant to applicable laws and regulations.

Conflicts

If the Code is found to conflict with local laws or regulations, only the Code sections permitted by applicable laws and regulations will apply. Please reach out to Legal if you have questions about Code applicability or conflicts of law. Nothing in Meta's Code or other policies is intended to infringe upon or chill an employee's ability to exercise his or her rights under the National Labor Relations Act.

Relevant additional guidance applicable to your region or country may be available on the Wiki, and will prevail to the extent of any inconsistencies with the guidance linked in the Code.

In the event of an inconsistency between the English version of this Code and any version of the Code that has been translated into a different language, the English version will prevail to the extent permitted by law.

Training

Training is essential to ensure that the Code and Meta policies referenced in it are top-of-mind in our daily work. It is a forum in which the content in this Code comes to life and it is an important part of Meta Personnel's engagement with Meta's policies. Thus, all Meta Personnel must complete mandatory training, including training on the Code and Meta policies as required, and failure to do so could result in disciplinary action or termination of business.

Achieving our mission responsibly is everyone's responsibility

At Meta, our reach and influence require that we commit to and hold ourselves accountable to a high standard, ensuring that we build technologies that have a positive impact, keep people safe and serve everyone. We all share in achieving our mission. With this mindset and a focus on building responsibly, we can continue to innovate with each other, our partners and for the billions of people we serve around the globe.

∞ Meta