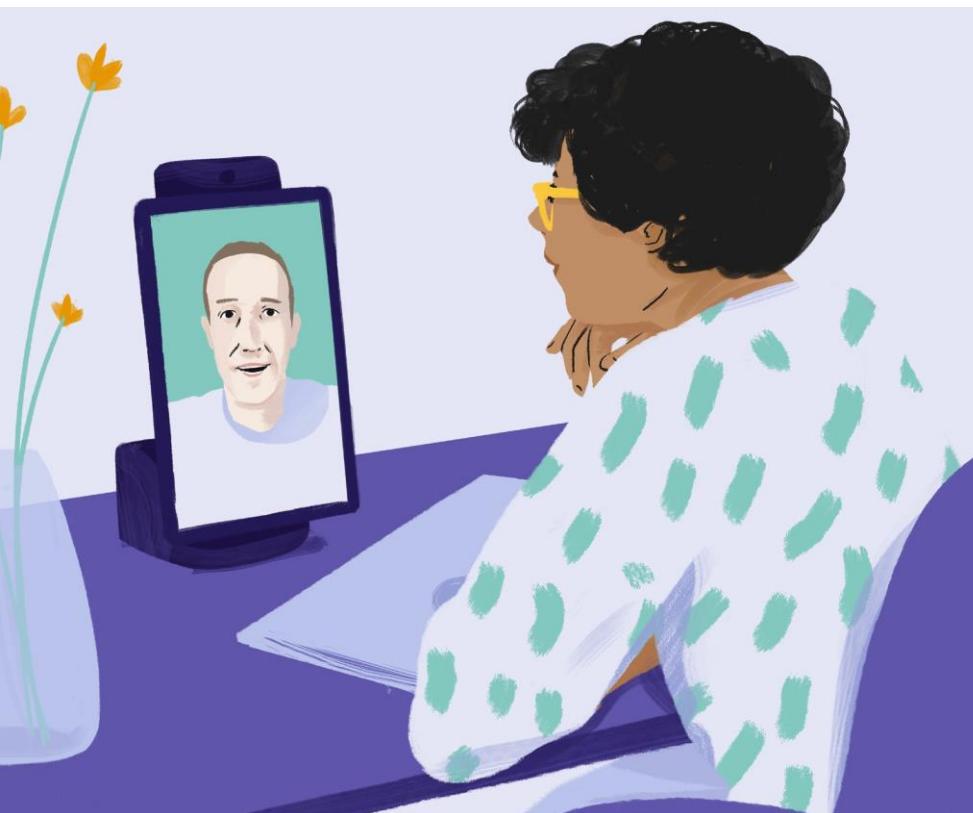


# Build Responsibly: The Meta Code of Conduct

A foundation for keeping people safe  
and making a positive impact





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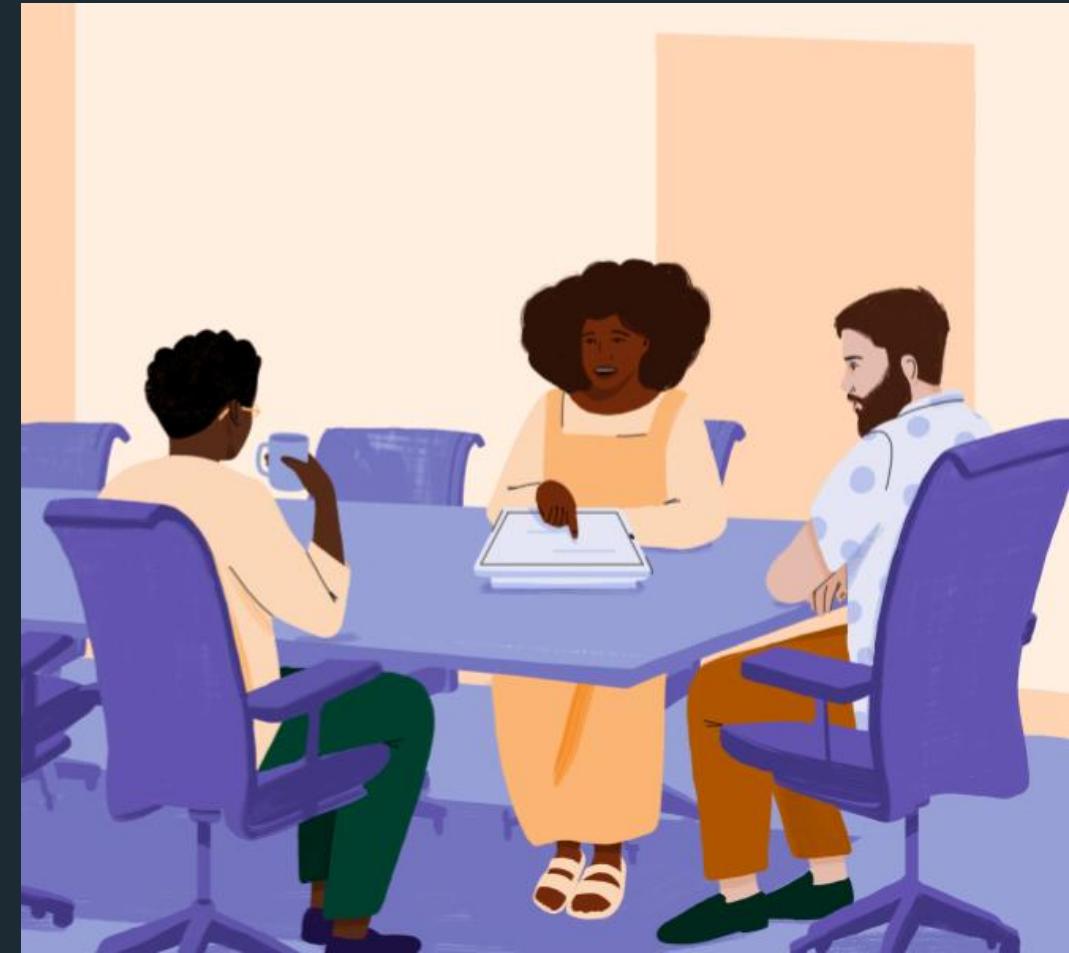
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# Meta Code of Conduct: Helping us work and build responsibly

Meta is built to accomplish an important mission: to build the future of human connection and the technology that makes it possible.

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 everyone who works at Meta understand the responsibilities we have and empowers them to act responsibly. It explains some of the legal rules we must abide by as well as the high standard to which we hold ourselves. 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 the future of  
human connection and the  
technology that makes it possible.

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, contingent workers—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 build responsibly.

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 and financial consequences.

## The Code applies to:



### AUDIENCE



### DEFINITION



### TERMINOLOGY USED THROUGHOUT THE CODE

Meta

All of Meta, including all subsidiaries and affiliates worldwide (e.g., Meta Platforms Ireland Limited, 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 and independent contractors)

Meta Personnel  
“We”/“Us”/“Our”  
“Each Other”

# Requirements of Meta Personnel

## All Meta Personnel are required to:

- Follow the requirements of this Code and Company Policies. Act lawfully, honestly, and in the best interests of Meta and our Meta users at all times.
- Make decisions that reflect Meta's mission, values, and principles, including when navigating ethical considerations.
- Complete required training, use the Code of Conduct and speak up when you have a question or concern.
- Cooperate fully with Company investigations, including requirements around confidentiality, participation, and honesty.
- 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 and champion the importance of abiding by the Code of Conduct and Company policies.
- Promote and maintain an environment where everyone feels empowered to work and build responsibly and can speak up when they have ideas, feedback, ethical dilemmas, or concerns.
- Promptly report potential or known violations of the law, this Code or Company policies.



# 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 Corporate Compliance & Ethics team
- Your Employee Relations (ER) Business Partner
- Internal Audit
- For privacy-related concerns, the [Privacy Report Tool](#)
- For Contingent Workers, through your company's issue escalation process and/or HR Point of Contact (POC)
- You can also submit a report via SpeakUp, Meta's concern reporting system, which in many cases allows for anonymous reporting:
  - Visit [fb.integrityline.com](http://fb.integrityline.com)
  - Call **+1-877-564-9619**
  - Dial the direct access code available at [business.att.com/collateral/access.html](http://business.att.com/collateral/access.html) and then +1-877-564-9619 following the operator's instructions

For more information on available resources and anonymous reporting options, visit the [Whistleblower and Complaint Policy](#).

If you have questions about the Code, need advice on a particular topic or issue or are unsure about how to report a concern, please visit the [Compliance & Ethics Hub](#) (for FTEs) or [People Portal Contingent Workforce](#) page or [CWquestions@](mailto:CWquestions@) (for CWs) for support.



## 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.

To ensure that we can conduct a meaningful investigation, you are obligated to participate in Company investigations when asked, comply with confidentiality requirements when advised, be truthful and honest, and fully answer the questions asked.

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, financial consequences, 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 under the [Whistleblower and Complaint Policy](#), 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 compliance and ethics teams at Meta

Meta's compliance teams, Product Compliance & Privacy and Corporate Compliance & Ethics, are partners to everyone at Meta for navigating the complexities of today and anticipating those coming tomorrow.

Product Compliance & Privacy focuses on product compliance and provides risk oversight and compliance related to privacy, integrity, and security. Corporate Compliance & Ethics serves as the generalist compliance function responsible for managing risks outside of integrity, security, and privacy, focusing on key risks that arise out of Meta's corporate and financial engagements.

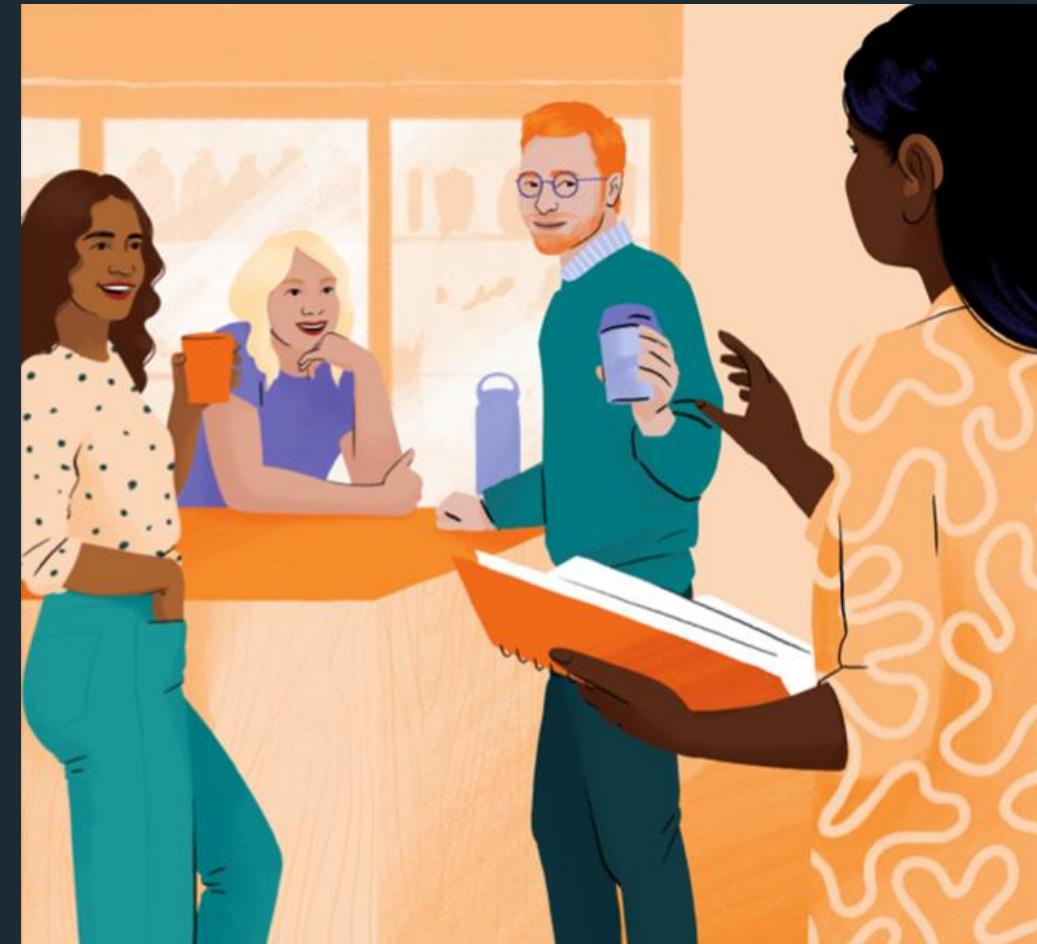
The Corporate Compliance & Ethics team offers the [Compliance & Ethics Hub](#) including tools, resources, compliance contacts, and guidance on how to make responsible decisions at Meta. Do not hesitate to reach out via the Compliance & Ethics Hub to raise a concern or ask for support.

# Building responsibly with each other

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

## In this section:

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Diversity at Meta

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# Diversity at Meta

At Meta, one way we support building the future of human connection and the technology that makes it possible is by leveraging our cognitive diversity to build better products for the global community we serve. Our strategies are anchored in People functions which improve our systems of hiring, retention, and development.

The People work ladders up to Product where teams from a wide range of backgrounds, experiences and perspectives focus on the experience of diverse users, helping us build products that serve everyone.



## Diversity at Meta means we:

- Strive to promote fair and equal opportunities in all aspects of recruitment and employment
- 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 and prohibit exclusionary behaviors, which may include bullying and workplace violence and isolating individuals and groups
- Foster an inclusive and respectful workplace by assessing our conscious and unconscious biases, removing barriers to equal opportunity, focusing on consistency and fairness in our people processes and Company procedures
- Encourage allyship and standing up for others

More guidance:

→ Equal Employment Opportunity Policy

→ Harassment Policy

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# Meta's diversity strategy

Across our core find, grow and keep, and Product pillars, and with the help of the people that we hire and retain, we will continue to push the frontier by inventing and developing the foundational technologies that will make the next generation of experiences possible.

## Find

To build cognitively diverse teams, 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

Support professional development and run a fair performance process so people can grow in their careers. 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 must be a space where everyone is welcome and has the opportunity to succeed.

## Build better products

To build products that serve everyone and promote economic opportunity, we must apply diverse perspectives to everything we do. Our goal is to build products that have universal impact. To do so, we leverage the cognitive diversity of the people who work at Meta to provide strategic input on our products, policies, programs and practices and apply those learnings to build for all.

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# Be respectful

We have a responsibility to maintain 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 at work and work-related events, whether in-person or virtual. Sharing, providing feedback, and questioning, all with respect, are core to our culture and key to our mission.

This culture helps us make informed decisions and have a meaningful impact in the world. Meta does not tolerate harassment, discrimination, threats, bullying, retaliation or any similar behavior against anyone.



## Being respectful means we:

- Treat every person within our community with respect, regardless of role, position, seniority, 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
- Don't 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 actual or potential violations of the Harassment Policy, ideally within 24 hours)

More guidance:

④ [Harassment Policy](#)

④ [Meta Whistleblower and Complaint Policy](#)

④ [Community Engagement Expectations](#)

④ [Equal Employment Opportunity Policy](#)



## 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, 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



**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 another manager, Legal, your HR Business Partner or Employee Relations Business 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.

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# 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 or traveling for 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 without an approved accommodation
- 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 Company policies related to travel and leverage Company travel management processes (e.g., CWT)
- Exercise good judgment and promptly report concerns about Meta Personnel or visitors exhibiting behavior that could be a sign of threats or acts of violence
- Comply with Company policies related to physical security, including visitors, access to facilities and use of Meta Personnel badges

### More guidance:

→ [Visitor Policy](#)

→ [Environmental Health and Safety Policy](#)

→ [Drug-Free Workplace Policy](#)

→ [Workplace Violence Management Policy](#)

→ [Global Environmental, Health, and Safety Wiki](#)

→ [Global Travel Support](#)

→ [Disability Reasonable Accommodations Policy](#)

→ [Facilities and Culinary Best Practices](#)

→ [Alcohol Use Policy](#)



**Q:**

A group of my external partners are coming to visit my office building. My partners 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.

Visitors also cannot take pictures of door badge readers or security cameras. 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. Escort unattended visitors to the nearest lobby or report them to Global Security.

**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 Business 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 (via [security@](mailto:security@), [Live Chat](#), or the phone number on your badge).



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# 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, such as taking advantage of your role or access at the Company for personal gain or investing in a competitor.

**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 rules in the Code of Conduct and Company policies to the extent applicable.

More guidance:

⊕ [Conflicts of Interest Policy](#)

⊕ [Conflicts Tool](#)

⊕ [Conflicts Wiki](#)



## Being loyal and transparent means:

- We all recognize that Meta's business is both broad in scope and constantly changing, which means what qualifies as a potential conflict of interest also changes.
- Avoid making a conflict-of-interest determination on your own. When it comes to outside activities and personal investments, review the additional guidance available on conflicts below, discuss the circumstances with your manager and obtain approval via the conflicts tool before you begin an opportunity.
- Do not allow any personal connections or family members to receive a personal benefit from your position at Meta or improperly influence, or give the appearance of improperly influencing, your decision-making.
- Give your best effort at work every day, not allowing outside jobs to hinder your contributions to the business.
- Be mindful that business opportunities discovered using Meta property, information, or your position should not be used for personal gain.
- Proactively identify situations that could put Meta's interests into possible conflict with your own.
- Promptly seek approval for actual, potential or perceived conflicts of interest via the conflicts tool.
- Refrain from engaging in an outside activity that requires review while the request is being evaluated.
- Be aware that interns and contingent workers may have different processes and requirements for conflicts of interest; please discuss with your manager or assignment manager, for CWs 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, suppliers, and partners**



**Meta Personnel**



**Competitors**



**Regulators**



**Third parties that rely on Meta's products and services**



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



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

- 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
- Outside employment, business, advising or consulting relationship with another organization
- Teaching or research engagements
- Holding political office or running for an elected position
- Investments in more than 2% of the total outstanding shares of a publicly traded company
- Investing in private companies that are a current or potential competitor of Meta, that have a business relationship with Meta, or that materially rely on Meta technology, infrastructure, products or services to develop or deliver the company's own products or services
- Serving as a member of an outside nonprofit or for-profit organization's board of directors or advisory board

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

1

Consult the Conflicts of Interest Wiki and discuss your potential conflict with your manager

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 request via the [conflicts tool](#)—be sure to provide all requested information.

3

Your manager and, in some cases, the Conflicts team will review your request and follow up on any next steps. Adhere to any guidance provided by your manager and the Conflicts team.

Disclose to your HRBP or CWBP if an immediate family member or a person with whom you have a close personal relationship is being considered for a role at Meta that is in your organization or over which you may be in a position to make employment-related decisions.

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# Protect Meta's confidential information

## We do not improperly use or disclose confidential information.

Disclosing (or “leaking”) confidential information outside of Meta or to those who do not need it for legitimate business purposes can have significant consequences for Meta’s business and could be illegal. 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 internal or external parties who have no legitimate 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:

- Understand how Meta defines and classifies **confidential information** in the Company's policies
- Do not submit, disclose or otherwise transmit Meta's or a third party's confidential, proprietary, competitive or other sensitive information outside of Meta systems (e.g., to a third party; your external drives, devices or accounts; or third party Large Language Model text prompts) unless there is specific authorization from Legal or your Privacy XFN
- 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 you if you leave Meta, and return it immediately if you inadvertently do
- Remove people who are no longer with the company from work-related communications, documents, and tools
- Remember to direct press inquiries about any Meta-business related topics that you are speaking on to **Press@**. You should not engage with the press on behalf of, suggest or purport to speak as a representative of Meta
- Do not make any unauthorized audio or electronic recordings
- The Code of Conduct and Company policies do not, and are not intended to, prevent members of our community from engaging in protected concerted activity with the press or any other employees related to discussing wages, benefits, or terms and conditions of employment in the US.
- Nor are the Code of Conduct and Company policies intended to limit or restrict employees from communicating directly with or providing documents to a government agency regarding a possible legal violation, even if not disclosed to Meta.

### More guidance:

- [External Engagement Policy](#)
- [Data Handling Guidelines](#)
- [Electronic Communications Policy](#)

- [Data Classification Standard](#)
- [Community Engagement Expectations](#)
- [Global Audio Recording Policy](#)

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## 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 Confidential Information and Inventions Assignment Agreement (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 or that which you are authorized to share)
- 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 internal processes such as content review

**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 such as 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.**

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## 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.



**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 press inquiries to [Press@](mailto: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 that you 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 or co-workers could be present and hear and see things that are meant to be kept confidential.

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# 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
- Be aware of attempts at social engineering
- 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](#)
- [Prototype Protection Policy](#)
- [FTC Order Records Management Policy](#)
- [FTC Order Records Retention Schedule](#)
- [Protecting Confidential Meta Property](#)

Diversity at Meta

Be respectful

Create a secure work environment

Be loyal and transparent

Protect Meta's confidential information

**Safeguard Meta's assets**

**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'm not sure if we have record retention guidelines or if 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 schedules, you strengthen our records management program and protect Meta. Follow all legal hold instructions for retaining information relating to ongoing litigation or other disputes. If you are unsure what to do, you should contact our eDiscovery and Information Governance team ([infogov@](mailto: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 information, among others, may be subject to records retention and legal hold obligations:

- 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

# Building responsibly 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:

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# Instill responsible data practices across Meta

Meta is committed to respecting people's privacy. Having responsible data practices 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's privacy obligations and commitments. Committing to privacy means embedding accountability, designing with privacy in mind, and ensuring that we continue to safeguard the privacy and security of the data we are entrusted with. We continue to enhance, transform, and embrace privacy in all our work.



## Instilling responsible data practices 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, including our employees', personal data and information in our products and operations—and how we handle and protect it once we have it
- Only share data that is necessary and proportionate for the purpose and ensure that sensitive personal information is not disclosed without the permission of the individual
- 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 User Data
- Complete Privacy Reviews as required prior to launch of any new or modified Products, Services, or Practices that collect, use, or share User Data, or prior to making external representations about our privacy and data security practices
- Ensure our Privacy Review process and our Company's privacy practices are in alignment with the Eight Expectations of Privacy
- 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
- Use and access internal tools with care and caution, only as necessary to do our jobs and never for personal gain or to assist a user in avoiding detection or penalty

More guidance:

- [Internal Privacy Policy](#)
- [People Data Access Policy](#)

- [Privacy Wiki](#)
- [User Data Access Policy](#)

Instilling responsible data practices across Meta

Building responsibly

Safeguard the payment platforms

**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're restoring content that had been removed.

It is okay to talk about Meta with friends, but you may not access other people's User Data, even 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](http://fburl.com/oops) to get support. Meta has zero tolerance for inappropriate access to User Data, even if you have good intent.

**Q:**

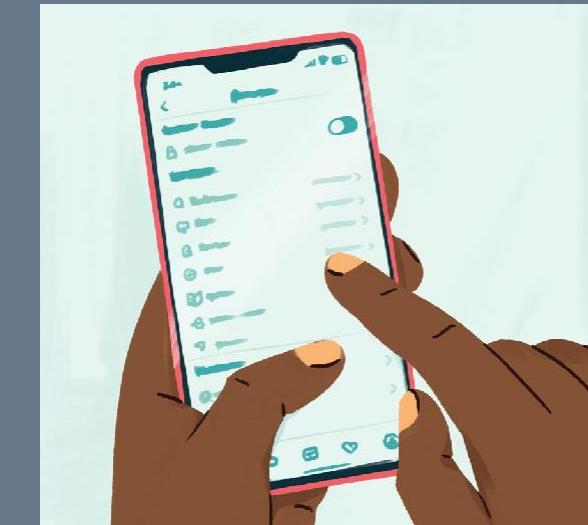
I recently transferred to a new team. My new manager sent a request to IT for the additional system access permissions that I will need for my new job. What should I do with the access permissions from my prior role and team?

**A:**

You should notify IT or your manager if 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.



**“Getting privacy right is a continual, collective investment across our company, and is the responsibility of everyone at Meta to advance our mission.”**

—MICHEL PROTTE,  
Chief Privacy and Product  
Compliance Officer

Instilling responsible data practices across Meta

**Building responsibly**

Safeguard the payment platforms

# Building 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, the need to build responsibly grows. As a result, Meta Personnel must understand and help Meta mitigate risks associated with everything we build and address ethical considerations throughout their day-to-day work.



## Building products responsibly means we:

- Help the company meet legal and regulatory obligations.
- Navigate ethical considerations and anticipate and mitigate potential harms by making decisions based on Meta's mission, values, and principles
- Proactively seek input from diverse perspectives and subject matter experts to make informed decisions
- Design and build products that prioritize safety, privacy, integrity, accessibility, equity, inclusion, and dignity and that include the highest protections for youth, such as age-appropriate features for youth audiences
- Raise and address concerns early and often throughout the product development process
- Conduct human and civil rights analysis from inception to implementation, such as determining whether marginalized communities have different experiences with our policies, products, and practices
- Engage in and action feedback from risk reviews & office hours, such as Privacy Review, integrity-related reviews including Integrity XFN review and Critical Impact Risk Assessment, Youth XFN Review, Accessibility office hours, Civil Rights Review, and Fairness AI office hours
- Diligently enforce our policies prohibiting harmful content & interactions on Meta platforms, such as hate speech, harassment, child exploitation, threats of violence and terrorism
- Provide appropriate warnings where necessary and articulate instructions for safe and responsible use of our products
- Create digitally accessible products and devices for people with disabilities and continue to improve the accessibility of existing products and devices

More guidance:

→ [Civil Rights Wiki](#)

→ [Compliance & Ethics Hub](#)

→ [Human Rights Microsite](#)

→ [Accessibility Wiki](#)

→ [GenAI Principles](#)

Instilling responsible data practices across Meta

Building responsibly

Safeguard the payment platforms



Efforts to build responsibly in the AI space are propelled by our mission to help ensure that AI at Meta benefits people and society. Through regular collaboration with subject matter experts, policy stakeholders and people with lived experiences, we're continuously building and testing approaches to help ensure our machine learning (ML) systems are designed and used responsibly and meet legal and regulatory obligations. We have developed five pillars of responsible AI that inform our work.

### Responsible AI Pillars

#### Privacy and security

Protecting the privacy and security of people's data is the responsibility of everyone at Meta

#### Fairness and inclusion

Everyone should be treated fairly when using our products and they should work equally well for all people

#### Robustness and safety

AI systems should meet high performance standards, and should be tested to ensure they behave safely and as intended

#### Transparency and control

People who use our products should have more transparency and control around how data about them is collected and used

#### Accountability and governance

We build reliable processes to ensure accountability for our AI systems and the decisions they make

Instilling responsible data practices across Meta

Building responsibly

Safeguard the payment platforms



## Keeping people safe

Meta's principles embody what we stand for and guide our approach to how we build technology.

Our principle "Keep people safe" means that we are committed to protecting our communities from harm. Activity on our platforms or services that is illegal, harmful or that otherwise breaches our policies can put our users or others at risk. The work we do to identify and address such risks is a fundamental part of our commitment to safety. Multiple teams are tasked with key aspects of this work, including those working on product development, content moderation, and legal and compliance matters. We also 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.

Every team at Meta has a part to play in ensuring that we act in line with our principles and meet our commitment to build responsibly. If you have questions or concerns about activity on our platforms you can raise them via the [Compliance & Ethics Hub](#) (for FTEs) or [People Portal Contingent Workforce page](#) or [CWquestions@](#) (for CWs).



**“ Our products can't be awesome unless we enable safe, inclusive experiences that protect people from harm. It's everyone's responsibility to design and build with integrity in mind from the start.”**

**Guy Rosen,**  
Chief Information Security Officer

Instilling responsible data practices across Meta

Building responsibly

Safeguard the payment platforms

# Safeguard the payment platforms

We help the world move money 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 payment platforms to perpetrate illegal activity, such as money laundering, terrorist financing and evasion of global sanctions and trade control regimes.

We comply with all applicable laws to prevent bad actors from utilizing our payment platforms to launder money, commit violations of global sanctions and trade control regulations, and engage in other illegal activities.

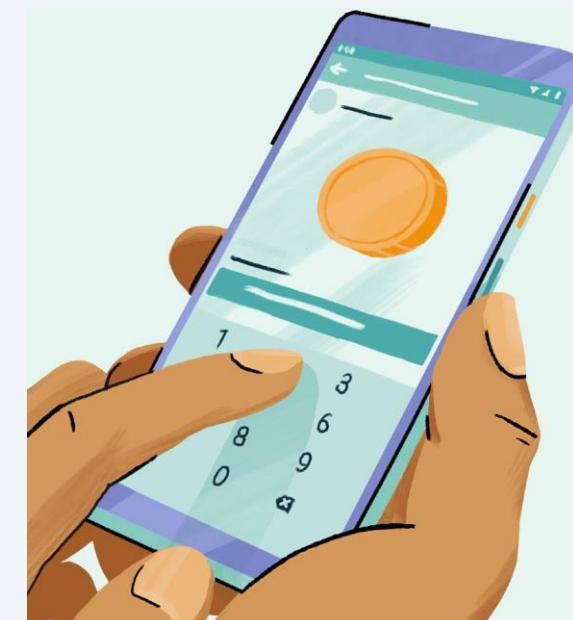
More guidance:

↪ [Meta Fintech Compliance Wiki](#)



## What is money laundering?

Money laundering generally refers to financial transactions in which criminals, including criminal organizations, attempt to disguise the proceeds, sources or nature of their illicit activities or to promote certain unlawful 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.

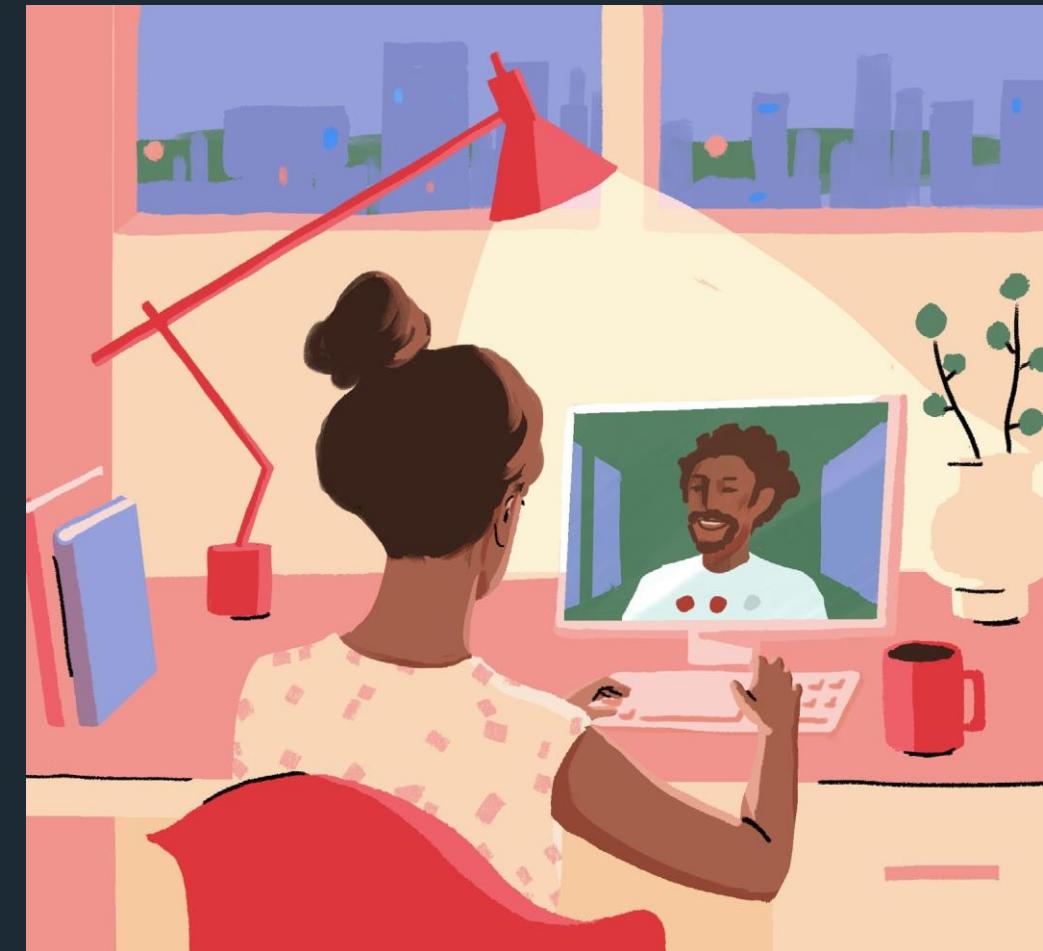


# Build responsibly with our partners

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

## In this section:

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# Follow global trade laws

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



## Following global trade laws means we:

- Appropriately screen individuals, entities, and countries to mitigate the risk of violating applicable global trade laws
- Comply with all applicable global trade 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
- Consult with Trade Legal if we believe there may be a potential violation of global trade laws

### More guidance:

- ⇒ [Global Trade Compliance Policy](#)
- ⇒ [Global Trade Compliance Wiki](#)
- ⇒ [Travel to Sanctioned Countries Wiki](#)

- ⇒ [International Hand-Carry Wiki](#)
- ⇒ [TradeLegal@](#)
- ⇒ [Antiboycott Compliance Wiki](#)

**Follow global trade laws**

Compete vigorously and fairly

Collaborate responsibly with third parties



## What do I need to look out for?

These activities could present trade risk.



Engaging third parties for both paid and unpaid services



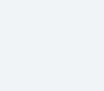
International shipping



Discussing, sharing, or transferring sensitive/controlled technology with external parties



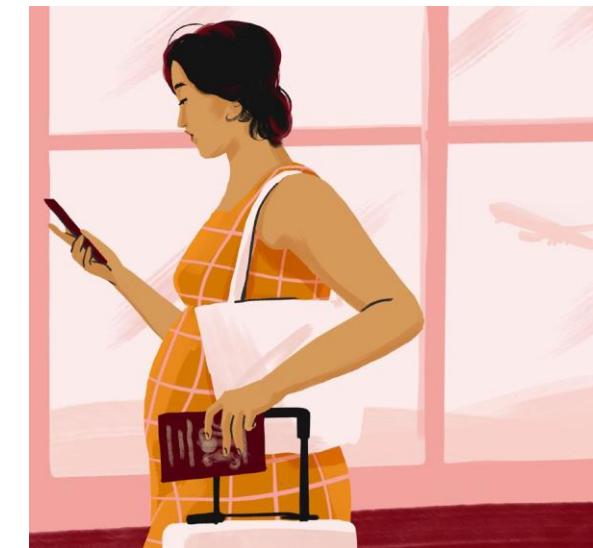
Launching new products or services



Obtaining or sourcing goods and services



Entering into contracts, including Non-Disclosure Agreements (NDAs)



**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:**

No, it is against company policy to (1) work in and conduct work from comprehensively sanctioned jurisdictions (currently Iran, Syria, Cuba, North Korea, and the Crimean, Donetsk, and Luhansk regions of Ukraine) and/or (2) take any Meta-owned, issued, or managed devices or equipment with you and (3) access company email and internal systems from those jurisdictions even when on personal travel.

Follow global trade laws

Compete vigorously and fairly

Collaborate responsibly with third parties

# 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
- Meta Personnel should not use non-public data or information directly or indirectly derived from advertisers’ use of Meta’s advertising services to develop products in competition with those advertisers, unless approved in advance by Legal

More guidance:

→ [Competition Compliance Policy](#)

Follow global trade laws

**Compete vigorously and fairly**

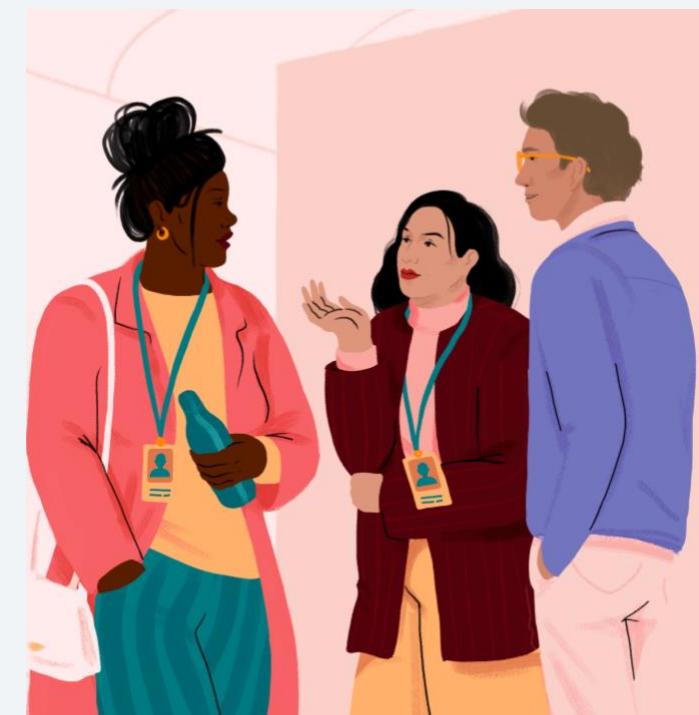
Collaborate responsibly with third parties



## 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



Follow global trade laws

Compete vigorously and fairly

**Collaborate responsibly with 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.

Meta works with and relies on third parties, including suppliers, vendors, and business partners, to help us achieve our mission. We can only do this if the third parties are qualified, act ethically and with integrity, and comply with applicable laws, regulations, and policies.

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 ethical, qualified, reputable and accountable
- Seek to engage only with third parties that align with Meta's mission, values, and principles
- Aim to source and partner responsibly by actioning risk mitigation measures and requiring third parties to adhere to Meta's expectations and relevant laws and regulations, such as privacy and security requirements, anti-corruption laws, tax laws, global trade laws, and the [Responsible Business Alliance \(RBA\)](#) standards to build safe, resilient, diverse and economically empowered communities
- Follow the Contract Policy for the review, approval, and signing of contracts, and source through competitive bidding processes where required.

### More guidance:

- ⊖ [Third Party Risk Management Policy](#)
- ⊖ [Global Sourcing and Procurement Policy](#)
- ⊖ [Contract Policy](#)
- ⊖ [External Communications and Advocacy Principles](#)

- ⊖ [Internal Privacy Policy](#)
- ⊖ [Third Party Security Policy](#)
- ⊖ [Anti-Corruption Policy](#)
- ⊖ [Supplier Diversity Principles](#)
- ⊖ [Outsourcing Policy](#)

Follow global trade laws

Compete vigorously and fairly

**Collaborate responsibly with third parties**

**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 its Supplier Diversity efforts 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, each other, and tools and resources to grow.

Since the launch, Meta has spent more than \$12 billion globally with 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 businesses wherever possible.

Follow global trade laws

Compete vigorously and fairly

**Collaborate responsibly with third parties**



## 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 in a timely manner to information requests or audits



Ensure that personnel take assigned required trainings

# Building responsibly 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 responsibly and serve everyone.

## In this section:

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# Lead with financial integrity

We create and maintain accurate financial and business records, and effective internal controls, 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 and expending Meta funds
- Manage budgets and handle Company financial resources carefully and honestly, including cash, ad coupons and corporate credit cards
- Prevent fraud, misleading representations, and the risk of facilitating tax evasion 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:

- ⊕ [Meta Global Sourcing and Procurement Policy](#)
- ⊕ [Global Travel & Expense Policy](#)
- ⊕ [Anti-Corruption Policy](#)

- ⊕ [Approval Authority Matrix](#)
- ⊕ [Contract Policy](#)
- ⊕ [Ad Coupon 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:

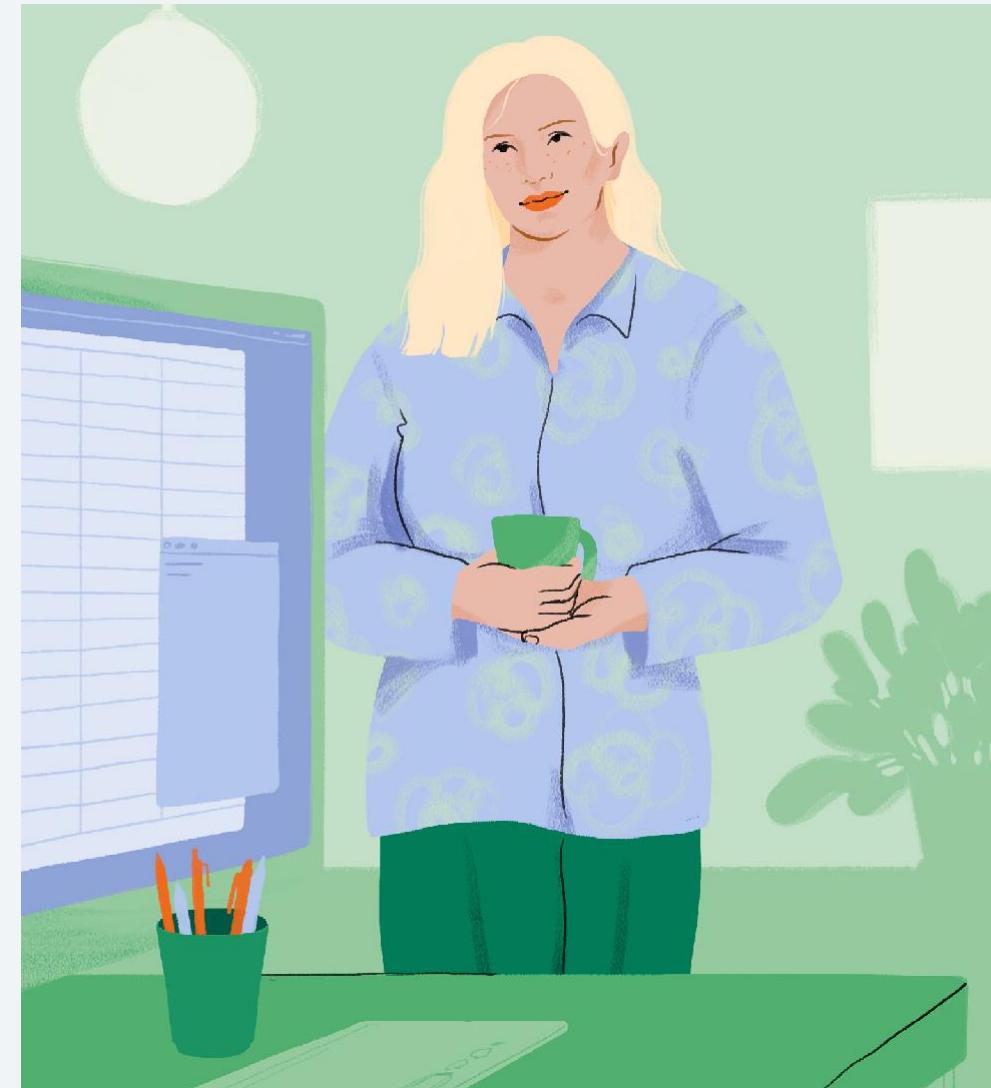
You are right to be concerned. It is critically important that revenue is booked for the correct fiscal period to ensure the accuracy and integrity of Meta's accounts and public financial filings. Ask them to clarify and provide more information. If you are still concerned about whether rebooking the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

Q:

Our supplier has called me to ask that we pay their next invoice into an offshore account. They were not clear on the reason although they mentioned something about it assisting their internal tax processes. I don't feel comfortable with this - what should I do?

A:

In addition to risks like potential money laundering via payments to offshore accounts, the supplier here might be trying to conceal their income and evade paying taxes. In some countries, like the UK, Meta and individual employees can be criminally prosecuted for facilitating tax evasion by other parties. Facilitation can happen even just by ignoring suspicious requests. Ask the supplier why they are requesting this change and do not process any payment until you have raised this with your manager, Finance, or Corporate Compliance & Ethics.



Lead with financial integrity

**Do not engage in insider trading**

Communicate openly and transparently

Prevent bribery and corruption

Giving and receiving gifts and entertainment

Interact with governments

Build a more caring, sustainable world

# 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.

Trading securities while in possession of material non-public information, called "insider trading," or providing a family member, friend or any other person with a "tip" on material non-public information who then trade on the basis of that information, is illegal.



## Preventing insider trading means we:

- Never trade in securities of Meta or any other company while in possession of material non-public information about such company
- Never tip, directly or indirectly pass on, material non-public information to any other person where the information may be used by such person to trade in the securities to which such information relates
- Protect non-public information from leaks and accidental disclosure, inside and outside of Meta, including by being mindful of conversations 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@](#)

Lead with financial integrity

**Do not engage in insider trading**

Communicate openly and transparently

Prevent bribery and corruption

Giving and receiving gifts and entertainment

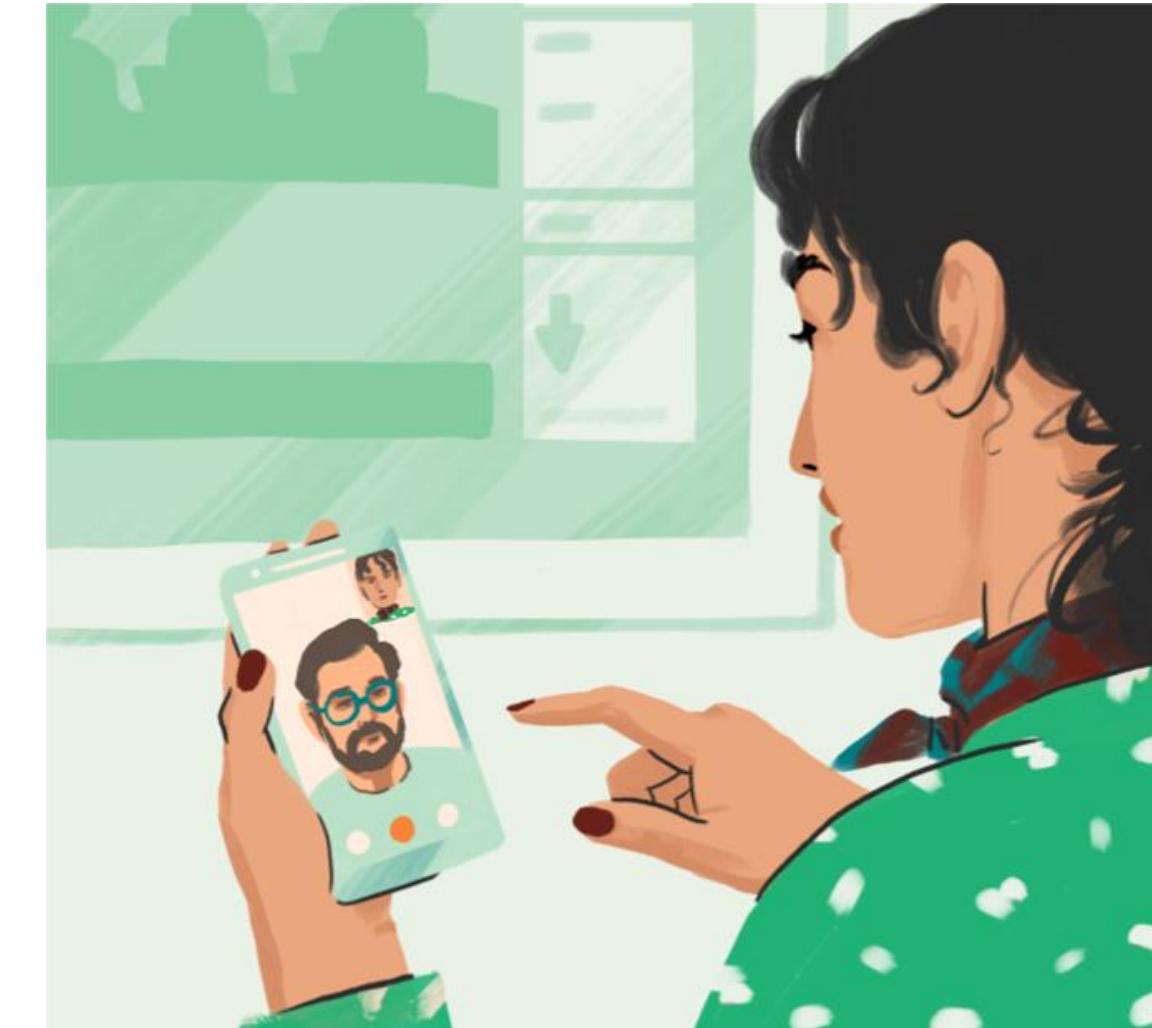
Interact with governments

Build a more caring, sustainable world



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

You can only trade Meta securities during our quarterly open trading windows (and as long as you do not hold material non-public information) or through an approved 10b5-1 trading plan. Generally, we open the trading window on the second full trading day after we release our quarterly earnings, and the window typically stays open until market close on the last 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, including the prohibition on use of ephemeral messaging without approval
- Focus Company resources on impactful external opportunities and seek approvals as required for any speaking and writing engagements
- Remember to direct press inquiries about any Meta-business related topics to [Press@](#). You should not engage with the press on behalf of, suggest or purport to speak as a representative of Meta. This Policy does not, and is not intended to, prevent members of our community from engaging in protected concerted activity with the press or any other employees related to discussing wages, benefits, or terms and conditions of employment in the US. Nor is it intended to alter your rights or Meta's obligations pursuant to applicable laws, including those relating to whistleblowing and data privacy

### More guidance:

→ [External Engagement Policy](#)

→ [Electronic Communications Policy](#)

→ [Publication Review Wiki](#)

→ [Community Engagement Expectations](#)

→ [Global Audio Recording Policy](#)

→ [Conflicts of Interest Policy](#)

→ [Press@](#)

Lead with financial integrity

Do not engage in insider trading

Communicate openly and transparently

Prevent bribery and corruption

Giving and receiving gifts and entertainment

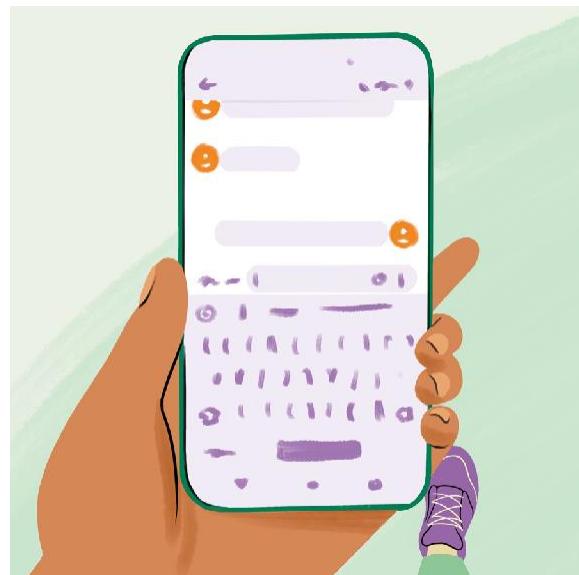
Interact with governments

Build a more caring, sustainable world



Always ask yourself these questions before you click send on an email or chat, post in Workplace, or 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 review the [External Engagements Policy](#) and, if required, submit an External Engagement Request to determine if this speaking opportunity meets Meta's requirements and has business value to Meta.

Q:

I am passionate about working in tech and would like to share my experience of working in the tech industry and support others who are doing the same. I'm considering creating a YouTube channel, writing a book/blog/article, or endorsing others who have shared their experiences in these ways. Do I need to check with anyone first?

A:

It's great that you're passionate about working in tech and want to share your experience. If you are considering a writing opportunity, such as a research publication or article, that relates to your work at Meta or for which you plan to use your Meta affiliation, request approval through the [Publication Review wiki process](#). Conflicts of interest approval is required for paid or recurring writing or speaking opportunities and for formal mentoring or advisory roles for another individual or company. Submit a request through the [Conflicts Tool](#) and visit the [Conflicts of Interest Wiki](#) for more information about outside opportunities that require approval.

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# 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
- Create and maintain accurate books and records and effective internal controls (see Lead with Financial Integrity)

More guidance:

⊕ [Anti-Corruption Policy](#)

⊕ [Gifts & Business Entertainment Policy](#)

⊕ [Global Travel and Expense Policy](#)

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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 Corporate Compliance & Ethics immediately for help.

**Remember, move  
fast does not mean  
move unethically.**



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## 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 Corporate Compliance & Ethics. 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 or Gifts & Business Entertainment Policies
- 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
- Refusal 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

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# 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 or entertainment is in good taste and does not create an appearance of impropriety
- Consult Meta's Gifts & Business Entertainment Policy, and follow the Policy's dollar limits and pre-approval requirements, before offering, giving, or receiving anything of value to or from a business partner, client, or any other person in connection with your work at Meta
- Review Meta's [Gifts & Business Entertainment Policy](#) to understand whether someone is a government official, and follow the Policy's jurisdiction-specific rules, value limits, and pre-approval requirements before offering or giving things of value to government officials
- Do not offer or receive cash, cash equivalents (e.g., gift cards) or loans
- Never give or receive a gift, entertainment, or anything else of value in exchange for a *reciprocal action* – if the item or activity creates or is intended to create an expectation of receiving anything in return, do not give or accept it

More guidance:

→ [Gifts & Business Entertainment Policy](#)

→ [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 Corporate Compliance & Ethics 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 to build the future of human connection and the technology that makes it possible.

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 and Political Activities & Lobbying 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

- Community Engagement Expectations

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**Q:**

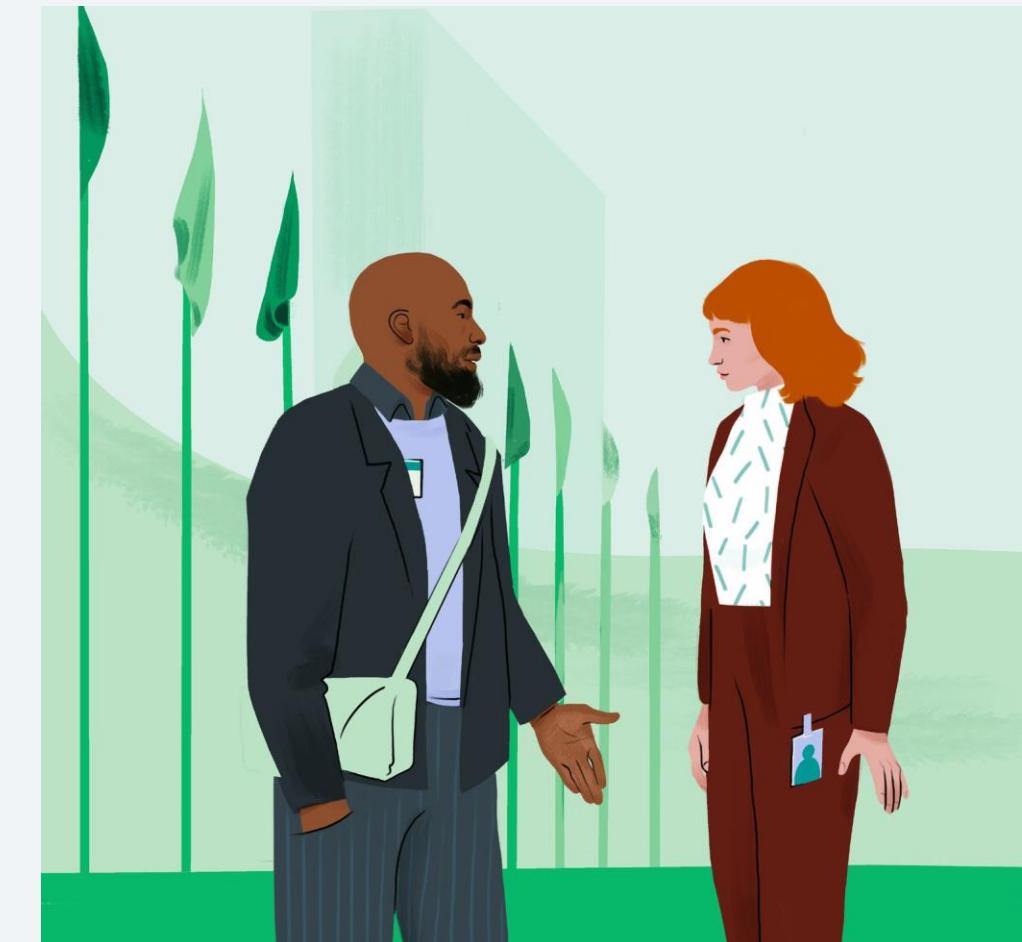
I am a public policy researcher focused on the regulation of fiber optics. I just learned that my cousin's partner has a new job at the government agency concerned with internet service providers and undersea cables. I decided to ask my cousin for an introduction because I think it will be interesting 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 Corporate Compliance & Ethics and the Public Policy team for guidance.**

**Corporate Compliance & Ethics 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 government.**



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# 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
- Enhance civil rights and the experiences of marginalized communities across our policies, practices, and products so that all communities may thrive on our technologies
- 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
- 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](#)
- [Civil Rights](#)

- [Grants & Donations Policy](#)
- [Human Rights Policy](#)
- [Responsible Minerals 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 globally recognized human rights. These include the right to privacy, freedom of expression and 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 [Corporate Human Rights Policy](#), our product integrity work and the ways that we identify, prevent and 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.

→ Human Rights Wiki

# Meta's civil rights commitment

Civil Rights are the rights of people to be free from unfair treatment and discrimination.

As a company, we must elevate civil rights principles in all that we do and commit to ensuring that our technologies are built with them in mind. Only then can we truly advance equity through our products and create spaces which enhance equity, dignity, and voice for everyone. This commitment is why Meta hired independent civil rights experts to conduct a two-year voluntary civil rights audit. As a result of this audit, in 2020, we set up our Civil Rights Team—the only VP-led, dedicated civil rights team in the technology industry and corporate America. The Civil Rights Team's work is centered on non-discrimination, fairness, and justice, which are critical to building policies, products, and practices for all our users. When we build with civil rights in mind, we can enhance our policies, products, and practices at the outset so that different communities may share the same experiences on our platforms, rather than reinforcing the inequities of society. We believe in building technologies on which all communities can thrive.

→ Civil Rights Wiki



## 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%

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 their 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 required training they are assigned, including training on the Code and Meta policies as required. Failing to complete assigned training undermines Meta's ability to meet its legal obligations and could result in disciplinary action, up to and including termination of employment or assignment.

# 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, so that we can 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.

