



PT Sustainability

Responsible Communication Guidelines

Checklist for evaluating risks and opportunities

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Framework

RELEVANCE WITHIN THE PT CONTEXT

Company sustainability at Portugal Telecom is part of our decision processes and aims to ensure the mid and long-term economic, social and environmental balance of the company, continuing to create value for shareholders, employees, customers and society at large.

Aware of the influence of communication and advertising in the satisfaction of our customers and in their attitudes and lifestyles, we accept the commitment of maintaining communication practices coherent with our commitments to company sustainability.

This practical responsible communication guide, voluntary and self-regulatory nature, compiles a number of good practices and recommendations, enabling its diffusion internally, in the entire value chain, suppliers and partners.

SCOPE

It should be used by all internal areas and external suppliers with impact on our stakeholders: from product management to the printing company, naturally including the marketing and communication, sales, customer service and contact of all PT companies in Portugal.

The observance of this guide helps to comply with generic and sector-specific legal dispositions, but will not replace the knowledge and conformity with the same. This guide is dynamic and is subject to revisions that reflect the development of the market and of new services.

Responsible Communication Definition

RESPONSIBLE COMMUNICATION

Responsible communication assesses consequences, risks and environmental and social opportunities of the means used and messages conveyed.

Privileges eco-conceived means and uses only ecological arguments only when justified and truthful.

Refuses the promotion of behaviours with negative impact on the quality of the environment and social relationships.

Promotes the positive evolution of society's ways of thinking and living as well as change in behaviours and attitudes.

*Responsible communication definition
CollectifAdWiser*

COMMUNICATION

Stands for advertising and other forms of commercial communication for the promotion of any kind of good or service, including institutional and corporate promotion.

*Communication definition
Consolidated Code of the International Chamber of Commerce*

CONTENT AND FORM

From conception to production, form and content

Responsible communication actions imply the inclusion of Respect for People and Environment statements in all phases of the campaign or event: from the idea to the end of the action.

COMPLIANCE

Anticipating the risk abiding by the Law in general as well as generic and industry codes.

PROACTIVITY

Managing opportunities and promote change in terms of attitudes and behaviours.

Responsible Communication Guidelines

LAW COMPLIANCE

COMPLIANCE WITH MARKETING AND ADVERTISING CODES,

MEDIA AND TELECOMMUNICATIONS

RESPECT FOR ENVIRONMENT AND PEOPLE

CLEARNESS AND TRUTHFULNESS AS STARTING POINTS

TREND LEADER IN RESPONSIBLE COMMUNICATION

Content

Transversal challenges

Environment

Human dignity

Child protection

Sector-specific challenges

Information security and Privacy warranty

Info-Inclusion

Communication-specific challenges

Transversal Challenges Environment

- Environmental statements should only be used when a significant amount of proof is immediately available;
- An environmental statement should be clear and accurate;
- It should not be misleading;
- It should correspond to a real advantage for the environment.

The "Environmental Statement" expression designates any statement or symbol or graphics that mention environmental or ecological issues or make a reference to environmental or ecological issues in terms of production, packaging, distribution, use/consumption or elimination of products.

*Environmental statement definition
ICAP's Code of Conduct in Terms of Advertising and other
forms of Commercial Communication, 2010*

Transversal Challenges Human Dignity

PT's communication should be inclusive in what concerns all consumer groups, including minorities.
Communication should reflect the cultural diversity in our society.

- Avoid all kinds of discrimination (nationality, religion, gender, age, culture, ethnics, political, sports club, etc.);
- Avoid the use of stereotypes. If it has to be done, do it with politeness and subtlety;
- Do not induce the idea of inferiority of a group;
- Do not present submission or exploitation situations with complacency;
- Do not exploit fear, misfortune, suffering or superstitions;
- Do not suggest or incite violent, illicit or anti-social behaviours;
- Do not compromise or devalue positive attitude, social behaviour and lifestyle;
- Promote active stakeholder participation, including customers;
- Be friendly and attentive.

Transversal Challenges

Child Protection

Communication on P&S for children, apart from being in compliance with all other principles, should take into consideration their (im)maturity and credulity when devising messages to be conveyed.

- P&S for children should be communicated preferably with their parents/ educators;
- Advertising should be EASILY and IMMEDIATELY identified;
- Do not use just children unless it is strictly necessary to evidence a concept or a function of the product;
- Do not use just children when the message is not meant for such segment;
- Do not associate a product with a physical, social or intellectual advantage;
- Do not suggest that the acquisition of a product is INDISPENSABLE;
- Communication should be absolutely clear in what concerns product price and performance;
- There should be no appeal to pestpower;
- Do not instigate excessive or irresponsible consumption;
- Do not promote irresponsible consumption of alcohol, tobacco or other damaging substances.

Sector-specific challenges

Information Security and Privacy Warranty

- All customer data is treated as confidential and is not supplied to third parties except when the customer expressly so agrees;
- Customers' consent to the use of their data should be obtained in such a manner so that they clearly understand what they are consenting to. It should not be hidden in small print and legal terms;
- Personal data should only be used when collected in compliance with the personal data collection and protection laws;
- Personal and behavioural data should only be used in personalised communication, with the customer's consent;
- The privacy policy should be published in accessible location and language.

Info-Inclusion

- Promote awareness and training actions on the safe use of our P&S;
- Induce parents and/or tutors into participating in interactive activities of their children and/or supervising them;
- Make available simple and intuitive tools as well as tutorials on their safe use.

Challenges Communication-Specific

PRICE

The price of P&S should be clearly communicated and absolutely transparent in terms of additional cost, inherent to their acquisition and its use such as for example mailing expenses, additional equipment or others, according to the nature of the product and the communication media used. For example, in mass media such as TV, Radio, Outdoor Billboards we may not communicate the price of additional equipment such as routers, boxes and pens. Nevertheless, such information should be clearly communicated in a leaflet and naturally during the acquisition. It should be the applicable VAT in case of consumer communications.

PROMOTIONS

- Promotion rules and their period of duration should be clearly communicated;
- The promotional offer should be made available immediately in the act of acquisition/subscription/installation;
- If a certain promotion is the offer of an experimental period, the customer should not be billed unless he/she has expressly and actively confirmed his/her wish to subscribe such P&S after the experimental period. Negative option should not be used;
- If a certain promotion implies the offer of x free months when subscribing a product/service, it should be absolutely clear the free trial period as well as the value to be paid at the end of such period.

ADVERTISING SLOGANS

- Advertising slogans should be precise, clear and not error inducing;
- If applicable, commercial conditions should be available immediately, written in clear language and legible font.

Challenges Communication-Specific

CLEAR COMMERCIAL TERMS AND CONDITIONS

Sales terms and conditions of products and services are the prime reason of complaints in terms of communication, in general terms.

- Commercial terms and conditions should be fully and clearly explained to customers before the sale and during the sale, namely any applicable customer retention period, promotion and offer as well as costs associated with the product or service;
- Mechanisms should also be created that enable the customer to assume in an explicit way that he knows and accepts the commercial terms and conditions for the subscription/acquisition of a product/service.
- Commercial terms and conditions should not be used in small print to correct or even contradict the message of the headline, being naturally suited to the means at stake;
- Special attention should be paid to words such as "free" and "unlimited";
- Whenever possible, we should avoid notes in communication, except for those absolutely necessary due to legal, regulatory or competition requirements.

WARRANTY

In the act of sale/subscription, the following aspects relative to the warranty of the P&S should be clear: scope, duration, support proof of purchase date and how the warranty can be used, by which means and in which way.

Challenges Communication-Specific

P&S PROVISION

- During the campaign, the P&S should be available in adequate quantity;
- If a certain P&S is available in a limited quantity, it should be communicated clearly.

RESPONSIBLE USE OF P&S

Communication should not place our P&S in illegal, insecure contexts such as for example driving, in gasoline stations or in hospitals, disturbing other people.

DIGITAL MARKETING

- Do not use advertising techniques that make difficult the use of the P&S; always have available and visible how to close the digital advertisement;
- Always provide links to pages with terms and commercial conditions of the P&S advertised;
- Always display an explicit acceptance of the terms and commercial conditions by the customer, in online acquisitions/subscriptions.

Challenges Communication-Specific

TELEPHONE MARKETING

- Take into consideration the time at which the message is sent or the telephone call is made; comply at least with what is specified in Decree Law 134/2009 i.e. to make telephone calls between 9 AM and 10 PM;
- Respect a minimum interval of x weeks between calls; currently, it is 3 months in the residential segment;
- Avoid making repeated offers; only make a new call in case a customer so requires, or if the P&S or commercial condition/promotion is really new;
- Suit the offer to the customer's profile, possession of P&S, network coverage, history of previous calls, satisfaction notes, taking into special consideration the dialogue with the customer and his/her availability.

Challenges Communication-Specific

COMPARATIVE ADVERTISING

- It should compare only comparable P&S and/or performances;
- It should be accurate, objective and realistic;
- The basis for comparison should be clearly proved and available for consultation;
- It should be in line with the best practices and with ICAP's code.

MEDIA RELATIONS

- Disclose information in a simple and truthful way;
- Reply quickly and perceptible to the asked questions;
- Do not discriminate any kind of media;
- Respect the same responsible communication rules in press releases as those established in marketing and advertising;
- Always make an evaluation about which media type could show greater interest for certain issue;
- Suit the information to the media.

Form

Rethink
Reduce
Reuse
Recycle
Communicate

Form

The most sustainable communication actions imply the inclusion of environment-related statements into all phases of the campaign or event, from the idea until the end of the action.

RETHINK

- Conceive the piece or event right from conception, taking into consideration, together with its communication and lifetime goals, eco-efficient criteria, from the raw material used to treat waste, through the method of production, storage, logistics and distribution, selection of local partners and certification of value chain;

- Define the criteria for supplier selection, privileging partners with certified management systems.

DEMATERIALIZED

Invest strongly in information and communication dematerialization: online bill, web-based and electronic communication.

REDUCE

- package or leaflet size;
- weight of materials used;
- number of colours used, printing mostly using two colours;
- varnishing;
- use of large patches of colour;
- use of couche paper;
- use of metallic colours;
- water consumption by using waterless printing techniques.

Form

REUSE

- Reintegrate value chain waste i.e. reuse of advertising canvases for tmn bags and poufs;

- Use recycled raw materials or originated from sustainable management.

COMMUNICATE

We should communicate our eco-efficient practices to our audiences.

- Example of datasheet to produce the sustainability report:

Printing on FSC-certified paper originated from sustainable managed forests. The manufacturing units of the paper producer comply with ISO 9001, ISO 14001 and PEFC responsibility chain certifications. Edition of 1,000 copies, produced at Gráfica Fernandes & Terceiro, a company that complies with ISO 9001 and ISO 14001 certifications. The printing was made with vegetable ink using computer-to-plate technique (no photolith printing).

SAIR DA CASCA ECO-COMMUNICATION GUIDE

Greenwashing

Graphic printing

Events

Audiovisual production

