

Funko Influencer Code of Conduct

This Code of Conduct applies to all individuals and businesses that engage in promotional activities on behalf of Funko, LLC and its affiliates (collectively, “Funko”) or otherwise have a material connection to Funko, including brand ambassadors, employees, agents, contractors, bloggers, incentivized reviewers, celebrity endorsers, and all other social media influencers, whether they are engaged by Funko directly or indirectly through an agency (“*Influencers*” or “*You*”). As an Influencer, you must clearly and prominently disclose your relationship with Funko. Your disclosure obligations apply equally to personal blogs, websites, social network pages or posts, and other media. The following guidelines explain how to comply with Funko and Federal Trade Commission requirements for making truthful endorsements.

1. DISCLOSE MATERIAL CONNECTIONS WITH FUNKO

Who: You have a material connection to Funko if:

- You are paid or compensated by or on behalf of Funko
- You are given something for free or a discount
- You have an existing or recent contractual relationship with Funko for marketing or talent services
- You are an employee, agent, or contractor, or are related to an employee, agent, or contractor of Funko
- You are a participant in a Funko influencer or ambassador program
- You have *any other connection* with Funko that could impact the weight or credibility a person gives your opinion about Funko or Funko products or services

Media Channels: The disclosure requirement applies to any materials created, contributed, distributed, commented on, or modified by you on all media, including:

- Social media (Facebook, Twitter, Instagram, Snapchat, Pinterest)
- Video platforms (YouTube, Vimeo, Vine, Periscope)
- Third-party forums and review sites (Reddit, Yelp)
- Personal blogs and Tumblr
- Third-party affiliate marketing sites
- Interviews/media appearances (if not clear you are being compensated or have a relationship with Funko)

Types of Communication: The disclosure requirement applies to any communication that could be interpreted to promote or highlight the benefits of Funko or its products or services. The requirements can apply even if you do not actually write about Funko (e.g., merely posting a photo showcasing a Funko product/service on social media is enough). Here are common examples where disclosure is required:

- Communications encouraging someone to buy a product/service or otherwise engage with Funko
- Posting on social media in connection with any ambassador program and/or using tagging any of Funko’s official social media accounts, including, but not limited to, @OriginalFunko, @FunkoGames and @Loungefly
- Content you share from Funko.com, including products/services and articles, as well as content you share from any Funko social media channel

- Sharing third-party content that is arguably favorable to Funko such as media stories that discuss the brand
- Content you create on your own personal blog or video site that includes information about and promotes Funko
- Content you create in connection with an invitation to provide consumer content that Funko may feature on its website or social media
- Selfies, videos, or other content prominently showcasing a Funko product/service, retweeting an endorsement, or any other depiction that could be construed as promoting the brand

2. ENSURE YOUR DISCLOSURE IS CLEAR AND PROMINENT ON EACH POST ON WHICH YOU ENDORSE A PRODUCT/SERVICE

How to disclose: Disclosures should be easy to see and understand. In other words, it should be clear to the audience that you have a connection with the company. A simple statement about your relationship is often the best option. Another option is to incorporate the disclosure into your post. On social media you can use shorter disclosures if necessary. See below for examples of good disclosures (disclosures should be tailored to the nature of your relationship):

- Blogs, Editorial and Product Reviews, Comments in Online Discussions
 - I am a Funko brand ambassador.
 - I received a free product/service from Funko
 - Thanks Funko for the free product/service
 - I work for Funko
 - I was paid by Funko
 - I am paid by Funko for each click
 - This is a paid advertisement for Funko
- Social Media (e.g., Twitter)
 - #FunkoAmbassador
 - #Ad
 - #PaidAd
 - #sponsoredbyFunko
 - #FunkoEmployee
 - #ReceivedFreeProduct

Location of Disclosure: Follow these guidelines for placement of the disclosure:

- Disclosures should be located at the beginning, next to, or on top of any applicable communication.
- For social media, the disclosure should be in each post (e.g., #ad).
- For video, the disclosure should appear in the video and must be on the screen for long enough to be noticed, read, and understood. For long videos, the disclosure should be repeated. Merely including the disclosure in the description of the video is not sufficient.
- If you cannot include or fit a disclosure in your posting, please do not use that platform.

Size of Disclosure: The disclosure should be in large enough font for the audience to read and understand it. The disclosure should also be visible regardless of whether viewing online or on a mobile device.

3. STATEMENTS MUST REFLECT YOUR HONEST OPINIONS, BELIEFS, OR EXPERIENCES AND MUST NOT BE FALSE, MISLEADING, OR UNSUPPORTED

- Do not make false or misleading claims about a Funko product or service (e.g., if you thought a product/service was bad, don't say it was great)
- Do not make a claim that cannot be supported (e.g., a Funko product/service has a particular health/safety benefit)
- Don't hold yourself out as an expert if you are not one
- If you create and distribute advertising or promotional material for Funko, make sure that it is not disguised to look like editorial, news, entertainment, or other non-advertising content
- Ensure all product/service demonstrations are truthful, fair, and accurate
- Discontinue statements if your communication is no longer true or accurate
- Do not make conclusory or comparative statements about competitors or their products or services (e.g., better than competitor)
- Consider what the reasonable consumer would expect your message to mean, taking into account who you are, how you say it, and assuming the reasonable consumer is not well-educated or well-informed

4. THINK BEFORE YOU POST

- Avoid controversial or potentially damaging statements about the Funko brand
- Follow the relevant website's posting requirements and terms of use
- If applicable, state that your view is your opinion and not representative of Funko's view
- Do not make, use, or distribute any offensive comments or sexually explicit material
- Do not disparage, libel, slander, or defame any person, entity, product, or service including a competitive product or service
- Do not promote any unsafe or illegal activities, including drugs, tobacco, alcohol, guns, or illegal gambling and wagering
- Do not link to any content or website that violates this Code of Conduct

5. YOUR POSTS ARE SUBJECT TO REVIEW BY FUNKO

Funko periodically reviews materials created by Influencers. If you violate this Code of Conduct, we will remind you about your obligations. Violators may be asked not to participate in future social media activities on behalf of Funko and/or Funko may terminate your relationship (if any) with Funko.