

RESPONSIBLE MARKETING POLICY FOR ALCOHOLIC BEVERAGES

INTRODUCTION AND SCOPE

Just as we are proud of the alcoholic beverage brands we sell and distribute, **we proudly promote responsible consumption**. This pride is reflected in the way we advertise and communicate about our alcoholic beverage brands.

The Coca-Cola HBC Alcohol Responsible Marketing Policy, (“The Policy”) provides clear and consistent guidance to all employees about the standards we must strictly adhere to for all marketing, advertising and promotion activities regarding all alcoholic beverages we distribute and sell.

Furthermore, all such activities must be in accordance with the applicable local laws, with the applicable policies of the respective brand owners, including The Coca-Cola Company and any applicable industry standards.

In case of doubt, you must consult with your local Legal Department.

The term “LPA” means the legal age of alcohol purchase or the age of 18 years in markets where there is no legal purchase age.

The term “primarily appealing” to people younger than the LPA means something which is particularly attractive to people under the LPA as opposed to “generally appealing” to people above the LPA.

CONTENT

- We only market to **consumers of LPA** and commit to ensure that underaged persons are not **and will not be targeted by our marketing and promotional activities**.
- We **do not employ novelty drinking vessels** that have an overtly juvenile appeal (e.g. test tubes, Jell-O shots).
- Alcoholic beverages **must never be used to sponsor celebrities** that appeal primarily to **people under the LPA**.
- Branded sponsorships of sporting and entertainment events will only occur where the majority of the audience is **reasonably expected to be over the LPA** (data should be obtained from the organiser, where available, such as TV audience data).
- We do not allow the participation of models and/or influencers in advertisements who have not reached the age of 25 years** or give the impression that they are younger than 25 years of age, nor should anyone below that age of 25 years actively endorse our partners’ alcoholic beverage products.
- Advertising and marketing materials **must never utilise or depict children**, and should not employ sports or celebrity figures, cartoon characters, music, language, gestures or other symbols or promotional gifts or prizes that appeal primarily to people under the LPA.
- Advertising and marketing activities **should not** directly or indirectly degrade studying or **associate the consumption of alcoholic beverages with education**.

- ❑ **Marketing activities should not be suggestive** of or demonstrate irresponsible behaviour such as overconsumption or other inappropriate use of alcoholic beverages.
- ❑ Advertising and marketing materials **must not portray people in a state of intoxication** or in a way that suggests that intoxication is an acceptable conduct. **Intoxication should never be condoned** as an acceptable behaviour. Similarly, advertising and marketing materials should not portray people drinking quickly or excessively.
- ❑ Coca-Cola HBC must not promote activities where the consumer **does not have control over the amount of alcohol** delivered for consumption, such as drinks being prepared furtively or in deceptive packaging.
- ❑ The alcoholic brands that Coca-Cola HBC sells and distributes **must not be associated with abusive or violent relationships** or situations, or with anti-social or dangerous behaviour.
- ❑ In all communications **alcohol content must be referenced in a straightforward and factual manner** without touting the strength of alcoholic brands distributed by Coca-Cola HBC in any advertising or marketing material.
- ❑ Alcoholic brands **must not be presented as being acceptable to consume before or during the handling of machinery, driving a vehicle, or any other activity** which requires high degree of concentration and body coordination.
- ❑ Advertising and marketing materials or sponsorship activities **should not imply that adult alcoholic beverage consumption is necessary to obtain social, professional, educational, athletic, sexual, or financial success, or to solve social, personal, or physical problems.** The materials and sponsorship activities should not create the impression that the consumption of alcoholic beverages increases mental ability or physical performance or improves one's mood.
- ❑ Our alcoholic beverages **will not be associated with the attainment of adulthood** or "rites of passage" to adulthood.
- ❑ Our alcoholic beverages marketing **should neither present in a negative way alcohol abstinence or minimal consumption of alcohol**, nor imply that refusal to drink is not socially acceptable.
- ❑ Our promotional activities around alcoholic beverages **will never put pressure on anyone to consume alcohol** and should include non-alcoholic alternatives where feasible.

PLACEMENTS

- ❑ No brand identification, including logos, trademarks, or names, **should be used or licensed for use on children's clothing, toys, games or game equipment, or other materials** intended for use primarily by people below the LPA.
- ❑ Advertising and marketing materials **should only be placed in media** (including college and university media) where at least 80% of the audience is reasonably expected to be above the LPA.
- ❑ All reasonable measures **should be taken in order to avoid advertising near schools**, ensuring at least 200 meters distance.
- ❑ With regard to alcoholic ready-to drink beverages (ARTDs), we **should be vigilant to avoid access by minors** and follow the guidelines of the respective brand owners.

RESEARCH

- We will **not assign** or conduct market or consumer research **among people below the LPA** in connection with any alcoholic brands.
- In the context of consumer research, **we will limit consumer samples to a maximum of two standard drinks per day**. We will never arrange research sessions in a manner where attendees might need to drive following the consumption of alcohol.

RESPONSIBLE DRINKING

- Advertising, marketing and sponsorships **should include an “Enjoy/ Drink Responsibly” message** and may also include other messages about responsible consumption.
- Sports sponsorships **must incorporate a prominent responsible drinking initiative**, where permissible.
- The promotion of alcoholic drinks recipes **must prescribe specific portions** (e.g. “30ml” instead of “one part”) **and the total alcohol content** (in “alcohol grams” or other locally recognised measurement units) for each drink. As a general rule, a single serve drink recipe should not contain more than the equivalent of 50ml of alcohol at 40% Vol.
- We will **not promote alcoholic drinks in close association with an energy drink**.
- We should **not have any association of the alcoholic drinks we are selling and distributing with tobacco products** or gambling for money.
- We will **not promote alcoholic beverages as a medicine-drug** nor imply that alcoholic beverages have the ability to prevent, treat or cure any disease or condition of a human being.
- Advertising and marketing materials **must not make any health claims**.
- We will not suggest that beverages **with lower alcohol content are better or more responsible to consume** than beverages with higher alcohol content. We will have regard, in the design of our alcohol marketing activities, to any daily/weekly consumption guidelines issued by the Health Authorities, or equivalent body in the market where the activity is taking place.
- It is **acceptable to depict adults consuming a drink after a sporting game**, only when clearly stated that their activity will not be continued afterwards.
- Advertisements **must not be shown during sports events organised for persons below LPA**.
- We will **not market the premium spirit drinks we sell and distribute to pregnant women** or use pregnant women in our marketing activities.
- Particular attention will be given in **avoiding advertising near religious buildings** or other places that might be considered offensive or not appropriate in the relevant market considering cultural customs.

DIGITAL MARKETING & E-COMMERCE

The principles described throughout this Policy also apply regarding digital marketing activities and e-commerce.

Additionally:

Any websites of Coca-Cola HBC which include alcoholic beverage brands that the company sells and distributes **must include a responsible drinking message**, nanny tags which describe the content of the webpage in a manner that permits their spotting by parental control software and a login page / age gate that requires consumers to input their date of birth and country of access. Additionally, our websites with alcoholic beverage content **should be linked with an educational site** for responsible consumption of alcoholic beverages.

If alcoholic beverages are to be referenced on social media pages:

Use any available setting which identifies the page as having alcohol-related content, and/or use any access restriction offered by such social media platforms where access can be restricted to users/visitors above the LPA;

Ensure that the respective user terms governing alcohol advertising on that platform (e.g. age-based targeting, warnings) are adhered to;

Implement and advance notice, that clearly state in a visible location (homepage, footer, bio etc.) that “Content for [LPA]+ Do not share with anyone under the legal purchasing age” and include a responsible drinking message;

In connection with content posted on Coca-Cola HBC controlled digital platforms **make sure this content is moderated on a regular basis to ensure Policy compliance**. Comments which promote dangerous or excessive drinking are not permitted.

PROMOTIONAL EVENTS

In conducting promotional events we must ensure that we promote our alcoholic beverages brands in a responsible manner.

Both, on- and off- premise promotions, should **avoid activities** that reward excessive/abusive consumption. Coca-Cola HBC will **not employ** either directly or indirectly event staff or volunteers under the LPA.

We will **not promote** or encourage any drinking in combination with physically, challenging, promiscuous, reckless, and/or irresponsible behaviour at an on-premise promotion.

All our promotional and sponsorship events **should include** responsible drinking messages and programmes where applicable (e.g. banners with responsible drinking messages, free water or other non-alcoholic beverages, and/or safe ride home or designated driver programmes).

Personal Conduct of Employees and Promotional Staff involved in on-or off premise promotions

If you chose to drink alcohol, you must do so with moderation. In other words, be mindful of the fact you are on company business and a company representative. Set an appropriate example.

- Do not** drink and drive.
- Do not** behave in a manner inconsistent with Coca-Cola HBC values and guidelines on daily behaviour.
- Do not** pressure others to drink.
- Do not** engage in reckless behaviour or stunts.
- Be sensitive** to any action or behaviour that may create discomfort to others.

As long as the principles above regarding promotional events are adhered to, tasting events within our own premises are allowed.

ADVERTISING AGENCIES

Advertising agencies, market research companies, media buyers, promotional agencies, importers, and other external consultants or affiliates must receive a copy of this Policy as part of their communications brief from the company and must commit in writing to abide by its provisions in any work they do on behalf of Coca-Cola HBC. Any complaints or criticism by any person relating to the marketing and promotion of alcoholic beverage products by Coca-Cola HBC **should be reported immediately to the local CA&S and Legal Departments** to proceed with any appropriate or necessary actions.

EDUCATION

Coca-Cola HBC countries selling and distributing alcoholic beverages must ensure that all staff involved in the sales, merchandising, consumer marketing, trade marketing, customer planning, R&D and CA&S of alcoholic beverage brands are aware of this Policy and its content.

If you wish to receive more information relating to this Policy or compliance with its provisions, please contact your local alcoholic beverages manager or CA&S and Legal Departments.