



Responsible Marketing Code

1. Policy Statement

This Responsible Marketing Code sets out the principles that we will adopt in marketing our brands across the world.

2. Policy Owner

Overall accountability for the Code lies with the Chief Marketing Officer (CMO). Responsibility for Code compliance lies with the Business Unit (BU) Marketing Directors or Managing Directors.

The Code will be periodically reviewed and updated to ensure it is consistent with our corporate values: We care; We are courageous; Own it; Act with pace; Stronger together.

3. Who does it apply to?

Communication and understanding of the Code is the responsibility of individual BUs and must cover all marketing teams, as well as customer management representatives and external partners.

The Code sets out the principles that we will adopt in marketing our brands across the world, whether marketed by us or any of our partners – and applies to companies who license our brands. For brands we bottle on behalf of others, we follow their own marketing codes and policies. It applies to all marketing and advertising activities.

All external marketing and other partners must be fully briefed on the terms of the Code and comply with its conditions. The requirement to comply with the Code must be included in the terms and conditions of all contracts and in all activity/project briefs.

4. Policy Detail - What do I need to know or do?

We follow relevant applicable national and local legislation and regulation. We also support voluntary industry codes of practice, wherever possible. All

marketing activity must be in keeping with both the letter and the spirit of legislation, regulation and such codes.

Promoting Healthier People

- The health of our consumers really matters to us. Our business was built on bringing an affordable source of vitamins to consumers at a time when diets lacked important nutrients. We've never forgotten our history and today we do our best to make it easier for our consumers to make healthier choices and enjoy life's everyday moments.
- We believe that any of our drinks can be enjoyed as part of a balanced diet and healthy lifestyle. However we aim to encourage positive behaviour change, and recognise that our brands can play a powerful role in supporting this ambition.
- We will not encourage excessive consumption of any of our drinks, and will bring our influence to bear on areas outside of our control, e.g. cinemas.
- We will not run promotions requiring repeat or multiple purchases (collector schemes).
- Where both regular and reduced calorie variants of a brand exist, we will include the reduced calorie variants in marketing.
- We will comply with local legislation when making health and nutrition claims, and if no such legislation exists, these claims will be based on sound scientific evidence.
- We acknowledge that our brands can be mixed with alcohol or consumed in an environment where alcohol is available, and any marketing activity in this context must support the principle of responsible drinking. Any marketing in conjunction with alcohol will not target those younger than the legal purchase age for alcohol and consumers featured must be over 25 years old.
- We will not market high caffeine¹ products to children under 16.
- We will not associate our high caffeine products with alcohol.
- Our marketing will reflect the richness of the markets and communities where we operate, and promote diversity and inclusion in society.

We believe that a responsible approach to marketing to children is a central component in the creation of building trusted, accessible brands, and we are committed to supporting the right of parents and carers (the gatekeepers) to make the appropriate choices for their children.

- We will not advertise our products in any media that directly targets children under 12. This includes any media in which 35% or more of the audience is composed of children under 12.

¹ More than 150mg of caffeine per litre

- We will not use celebrities or licensed characters whose primary appeal is to children under 12
- We will not use movie-tie ins related to movies of primary appeal to children under 12.
- We will ensure that any competitions or promotions for children under 12 require the consent of the gatekeeper – and take all reasonable steps to ensure that gatekeepers are notified when we receive an entry form for any activity relating to their children under 12.
- Where we show children under 12 in our marketing communications, they will reflect the principles of a balanced diet and active lifestyle.
- We will only use games and gaming in a family setting like a restaurant, and when the gatekeeper's permission and supervision is sought
- We won't sample children under 12 without the gatekeeper's consent.
- We respect the right for schools to be a commercially free environment. We are happy to make our drinks available where they comply with codes and we may, where requested, support charitable giving and social marketing campaigns, but these will not promote our products. We will not market our drinks in schools – with the exception of our water brands, where invited by school authorities.

Promoting a Healthier Planet

A healthier planet is one where resources are used responsibly and the natural world is protected, so that future generations can continue to enjoy life's everyday moments. We are playing our part, focusing on the small changes and innovations that will contribute to a better world in the longer term.

From the sourcing of our natural ingredients to the manufacturing and distribution of our drinks, we are committed to doing right by the environment, creating A Healthier Everyday for today and tomorrow.

Our marketing will not contravene our Healthier People, Healthier Planet commitments, and wherever possible, will actively support them. For example:

- Where appropriate, our consumer and trade marketing will encourage the promotion of a healthier planet by encouraging recycling and reducing the impact of littering. And in GB & Ireland all consumer and trade advertising will carry recycling messages.
- We will leverage the scale and reach of our brands to inspire change and as such all our packaging will carry recycling messages that enable consumers to dispose of packaging correctly and responsibly.

In addition to our specific marketing code focus areas, it is our policy to:

- Comply fully with all applicable environmental laws and regulations.
- Set targets that will positively influence healthier consumer choices. For example, our Mission 2025 healthier choices target: < 30 calories / 250ml serve.

5. Policy breach and consequences - What happens if I don't follow it?

Failure to follow this Code could affect your compliance rating on myPerformance and ultimately lead to disciplinary action.

6. Related Documents

Our marketing also complies with all other relevant Britvic policies, such as the Marketing Privacy Code and Social Media Policy for Marketing Consumers.