

# Responsible Marketing Policy

(issued in 2018)

These are our group-wide mandatory standards applicable to all commercial communication to customers and consumers by or on behalf of Asahi Europe and its companies. Includes (but not limited to) beer brand advertising, paid public relations activities in any media or form, packaging, direct marketing, customer marketing, merchandising, sponsorship and experimental marketing, such as promotional events.

Where we are subject to laws, regulations or self-regulatory codes which apply higher standards, we must also follow these. We will also seek to participate in national and industry self-regulation where we operate.

## 1. We act with honesty and integrity

- a. Be decent and truthful, and prepare commercial communications with a due sense of social responsibility.
- b. Comply with applicable laws and regulatory requirements.
- c. Do not jeopardise the reputation of our business or brands.
- d. Be mindful of sensitivities relating to local cultural values, gender, race, sexual orientation and religion.

## 2. We respect our consumers

- a. We respect individuals' choice and decision whether or not to drink alcohol beverages.
- b. User-generated content that is subsequently used in commercial communication must have the permission of the original user or owner of the content.
- c. Only communicate directly with consumers who have given express permission and are of legal drinking age. Always provide a mechanism to opt-out of further communications.
- d. Always provide individuals with clear information about how we collect and use personal data. Store all personal data safely.
- e. Our online behavioural advertising should comply with relevant self-regulatory standards of transparency and control.
- f. Do not suggest that alcohol beverages should be consumed for potential net health benefits.
- g. Do not claim that alcohol has curative qualities, nor offer it expressly as a stimulant, sedative, tranquilliser or delivering energising or stimulating effects.
- h. We provide to consumers the alcohol content of and factual nutritional information about our beers.
- i. All participants in market research must be of legal drinking age and be consumers of alcoholic beverages or legally purchase alcoholic beverages for others who are.
- j. Because legal drinking ages vary, we will not use research or data from one market in another market where it would not have been permissible to collect it.

## 3. Our beers are for adults of legal drinking age

- a. Commercial communication must not be directed at or affiliated with persons under the legal drinking age.
- b. Individuals featured in or promoting commercial communication (including events) must be aged 25 or over, except that in controlled environments where all attendees or audience are of legal drinking age, individuals featured or promoting (paid or unpaid) may be under 25 but must still be over the legal drinking age.
- c. Use only communication channels and sponsor only individuals if at least 75% of the relevant audience are of legal drinking age.
- d. Do not employ cartoons, characters, animals, icons, music or other elements that are intended to have primary appeal to persons under the legal drinking age.



- e. Our websites and social media accounts must have at least age affirmation mechanisms to confirm that users are over the legal drinking age.

#### 4. We promote responsible beer drinking and seek to prevent irresponsible consumption

- a. Responsibility messages (statements or icons plus a link to [www.aboutalcohol.com](http://www.aboutalcohol.com) or local equivalent website) must be clearly visible in all commercial communication (except where not appropriate).
- b. Do not emphasise high alcohol strength of a brand.
- c. Do not promote or condone irresponsible or harmful consumption of alcohol.
- d. Attendees at promotional events should be encouraged to assume personal responsibility for their decision whether or not to drink alcohol.
- e. Do not associate with situations where large amounts of alcohol are consumed rapidly.
- f. Do not suggest success (including sexual, social or sporting) or physical prowess as a result of consuming beer.
- g. Do not show or suggest drinking beer before or during activities that require a high degree of alertness, judgment, precision or coordination (such as driving or extreme sports).
- h. Do not make an association with violent or anti-social imagery or behaviour, or with illicit drugs or drug culture.
- i. We will moderate user-generated content on our websites and social media accounts frequently and remove inappropriate content promptly.

#### 5. We promote alcohol free and non-alcohol beers

All of these standards apply to commercial communications about all of our beers, except that, always subject to local laws and social expectations, in relation to beers with alcohol by volume of 0.5 % or less we may:

- a. promote such beers for having a low alcohol content;
- b. make accurate and reasonable health and functional benefit claims about such beers;
- c. promote drinking such beers to consumers of legal drinking age at occasions when alcohol would not be appropriate (such as before driving or at work); and/or
- d. include in market research related to such beers participants who choose not to drink alcohol, but only as long as they are of legal drinking age and any data collected is kept separate from data related to other beers.

#### 6. We live and enforce responsible marketing

- a. All business units must have an oversight committee of suitably senior and trained employees to monitor and evaluate commercial communications and to manage complaints - with links to an independent external complaint process where possible.
- b. All employees and agencies who work on commercial communications will be trained on these standards each year and are expected to be familiar with and apply them in all work.
- c. Anyone creating commercial communication for us should comply with both the spirit and the letter of this Policy.