SUNTORY
BEVERAGE & FOOD EUROPE

Responsible Code of Marketing and Communications



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Introduction

Suntory Beverage & Food Europe (SBFE), a regional division of the Suntory Group of companies manufactures, distributes, and markets some of the most well-known soft drinks brands and ready to drink products across Europe and overseas markets.

Our corporate value of "Growing for Good" guides how we do business at SBFE. We believe that by upholding high environmental, social and ethical standards and by driving positive change throughout, we will grow a successful business for the long term. Our founder, Shinjiro Torii, started Suntory with the idea that business can be built in harmony with people and nature. This is a philosophy we continue today, working to ensure that future generations inherit and enjoy a healthy planet and society.

Our collective responsibility starts with personal accountability. The trust that is earned through responsible marketing of our products is core to our success and growth as a company. It is the way that we bring our core value of Growing for Good to life, for our employees and consumers. For this reason, it is our expectation that every employee and partner are committed to following this Code as part of their everyday ways of working.



Pauline Varga
Chief Marketing Officer, SBFE

Purpose

The purpose of the Code is to serve as a framework to ensure all SBFE marketing activity represents our brands and aligns with our values and commitment to our consumers and the wider community.

The Code ensures that our employees are accountable for the marketing and communications of our brands, and that they adhere to the highest standards of responsibility as set out in this Code.

Our Code and the principles it contains also provide guidance to those with whom we do business, to help ensure our brands are marketed and promoted in a responsible manner. All employees, partners, agencies and anyone acting on our behalf are required to adhere to this Code.

In many countries where our products are sold, there are national or regional advertising and marketing codes, laws and regulations, both mandatory and self-regulatory, for example UNESDA's marketing and advertising practices. This Code is intended to complement these local codes and requirements while also providing responsible company standards in countries where marketing codes and local regulations are not yet in effect.

It is therefore also important that you consult your market specific marketing code as local regulations may vary.



Scope and governance

Compliance with this Code is mandatory for all the SBFE group of companies and shall be applied as the minimum standard. Advice on the application of additional local laws and regulations (including voluntary codes) can be sought from the local External Affairs, Legal and Regulatory teams.

This Code applies to all our products. It applies but is not limited to all brand advertising, consumer communications, trade (B2B) advertising, promotions (retail and horeca, on and off-line), sampling, merchandising, brand websites and direct marketing, point-of-sale materials, consumer public relations, events and experiential, sponsorship activities, digital and social media including influencer activity and product placement.

This Code applies to all media.

Training for marketing employees and their agencies in the application of the Code will be provided annually. This Code is approved by the External Affairs, Marketing, Legal and Regulatory departments and will be reviewed annually.



Core principles



Each employee and partner will ensure that marketing activity and communication will:

Be **legal, substantiated, ethical, truthful and conform to accepted principles** of good taste and decency, fair competition, and good business practice.

Comply with all **local legislative and regulatory requirements** including advertising codes of best practice.

Be clearly **distinguishable and transparent** in its commercial nature, including disclosure of commercial arrangements with influencers and partners.

Respect and represent the diversity of our audience in relation to ethnicity, gender, sexual orientation, religion or local cultural values, physical and mental ability, and appearance, and not perpetuate stereotypes.

Not use themes and terms associated with aggression, anti-social behaviour or violence including sexual violence.

Respect our commitments to sustainability and reducing our **impact on the environment**.

Ensure any **claims are true, proven** (with credible evidence) and non-misleading.

We are an **apolitical organisation**. We don't undertake any marketing that could be construed/interpreted as political or supporting one politician or political party and beliefs over another.

We will continue to **protect the reputation of our brands**. We will not engage in any marketing activity that could compromise the good will that we hold with our consumers.

Responsible marketing to children and schools

In accordance with best practice and international standards, for example the International Food and Beverage Alliance, we will not directly market our brands to children aged under 16. In countries where the legal definition of a child is greater than 16 than the local law supersedes the SBFE code.
This means:

No advertising will be placed in **any media where 30% or more of the audience are aged under 16**.

We will not sponsor celebrities, events or work with influencers that have primary appeal to children aged under 16.

We will not sample directly to children aged under 16.

We will not design promotions and activities that have primary appeal to children aged under 16.

We will not show images of children in marketing communications unless they are relevant to the message or product i.e., in the context of a family situation or an activity with a parent or carer.

We will not sell any of our soft drink brands in primary schools. In secondary schools where we have commercial arrangements, we will only sell low-calorie or zero sugar drinks. ***We will not provide any branded vending machines in schools or provide logos or commercial communications.**

In France it is the law that **we do not sell products in any school environment.**

We will not conduct any branded commercial marketing activities in schools. Any educational material provided to schools will be unbranded and delivered via third party organizations.



Responsible Consumption

We will always inform consumers of the nutritional content of their beverage through on-pack nutritional information, as well as online information available through brand and/or company websites.

All our drinks labelling will indicate recommended serving or portion size, to allow consumers to make their own decisions about their own healthy consumption limits.

We will not promote unhealthy or unbalanced nutritional diets and will always depict responsible consumption of our products. This includes the responsible sampling of our products.

We have a wide portfolio of drinks brands containing zero sugar, no added sugar and reduced sugar, alongside drinks containing more than 5g sugar per 100ml in some markets. Our advertising and marketing communications, where possible, should convey to the consumer the range of product choices available to help them make informed choices.

Energy Drinks should be enjoyed in moderation. This means:

We will not directly advertise, market or sample any of our energy drinks brands to children aged 16 and under.

We will not depict the excessive or irresponsible consumption of energy drinks brands.

When promoting the benefits of energy drinks and their ingredients, **no claims will be made on alcohol together with energy drinks**.



Alcohol containing drinks

Please refer to the SBFE Responsible Marketing Code for Alcohol Beverages on the next page. This supplementary code contains detailed guidance related to the naming, packaging and marketing of alcohol containing drinks:

We will not advertise, market or sample any ready-to-drink alcohol product to consumers below the legal purchase age/ and or legal drinking age according to the local laws and regulation.

All advertising and **marketing communications will carry a legal purchase age indicator**, as well as communicate a responsible drinking message.

We will not depict excessive or irresponsible consumption of alcohol.

Labels of energy drinks **will not promote mixing with alcohol or make any claims that the consumption** of alcohol together with energy drinks counteracts the effects of alcohol.

Energy drinks containing 150mg/l of caffeine **must not be marketed and promoted** with alcohol or manufactured as ready-to-drink products.

Energy drinks containing 150mg/l of caffeine **must include on their labels the advisory statement "High Caffeine Content. Not recommended for children or pregnant or breast-feeding women"** followed by the exact caffeine content expressed in mg per 100ml in addition to "Consume Moderately" or similar wording based on consumer understanding.

SBFE Responsible Code of Marketing for Alcohol Containing Beverages

This Code is intended to complement local codes and requirements while also providing responsible company standards in countries where marketing codes and local regulations are not yet in effect.

It is therefore also important that you consult your market specific marketing code as local laws and regulations may vary.

We will not advertise, market or sample any ready-to-drink alcohol product to consumers below the legal purchase age and/or legal drinking age dependent on local laws and regulations. In addition, any consumer research will only be conducted with people of the legal drinking age and above.

All advertising and marketing communications will carry a legal purchase age indicator and must communicate a responsible drinking message.

The alcoholic nature of a drink should be communicated on its packaging with absolute clarity.

A product's lower alcoholic strength may be emphasised proportionately when it is below the average strength for similar beverages.

Factual information about alcoholic strength may be given.



A drink, its packaging, advertising, marketing and any promotional material should not in any direct or indirect way:

(a) give the higher alcoholic strength, or intoxicating effect, undue emphasis;

(b) suggest any association with bravado, or with violent, aggressive, dangerous, anti-social or illegal behaviour (though sponsorship of activities which may be dangerous after alcohol consumption, such as motor or yacht racing, are not in themselves in breach of this clause);

(c) suggest any association with, acceptance of, or allusion to, illicit drugs;

(d) suggest any association with sexual activity or sexual success;

(e) suggest that consumption of the drink can lead to social success or popularity;

(f) encourage illegal, irresponsible or immoderate consumption, such as drink-driving, binge-drinking or drunkenness;

(g) urge the consumer to drink rapidly or to 'down' a product in one;

(h) have a particular appeal to under-18s;

(h.i) in the case of sponsorship (e.g., events, venues, teams) those under 18 years of age should not comprise more than 25% of the participants, audience or spectators. Evidence of audience age profile must be provided and approved in advance of any commercial arrangement. Individual sponsorship is limited to people aged 25 and over.

(i) incorporate images of people who are, or look as if they are, under 25 years of age, where there is any suggestion that they are drinking alcohol, or they are featured in a significant role. Images may be shown where people appear only in an incidental context;

(j) suggest that the product has therapeutic qualities, can enhance mental or physical capabilities, or change mood or behaviour.

Sustainability

We will uphold our Suntory values of Growing for Good and Giving Back to Society by ensuring that we respect our commitments to sustainability and reduce our impact on the environment. All employees marketing our brands should read and respect the company's sustainability policy. This means that we will:

Work with our agencies and production partners to **minimise our impact on the environment**.

Not depict any **irresponsible environmental behaviours** or make unsubstantiated environmental claims in any advertising or marketing communications.



Include a **positive recycling message** or logo mark on product labels, TV, press and outdoor product advertising to encourage consumers to recycle/return our drinks containers. Where possible (e.g. taking into account space considerations) to include on other marketing communication assets including point of sale and digital.

Only use **recyclable material** for temporary point of sale and merchandise items.

Not provide single use plastic items as plastic cups, stirrers, merchandise, or promotional items.

Minimise waste through the provision and promotion of recycling and/or responsible disposal of packaging at all sampling activity and brand activations (including events).

Privacy



Through our marketing activities and promotions, we are acutely aware of the responsibility of managing personal data. We commit to keeping data confidential and to be transparent in how we use it in line with local regulations. This means we will:

Protect the data of those participating in our marketing communications and not share with any third parties, unless authorised by the participant.

Prominently display a link to our Privacy Policy on all relevant assets and platforms, including our websites and promotions.

Take care that any initiatives designed to also collect personal information will be **transparent about the collection, storage and use of the data.**

Comply with all data protection regulations and provide clear and transparent mechanisms for consumers to opt-in and opt-out of marketing communications.

Compliance

Compliance with this Code is mandatory for all the SBFE group of companies and shall be applied as the minimum standard.

Each market of SBFE has a process for reviewing and approving marketing communications to ensure the letter and the spirit of the Code is understood and upheld. It is also required to ensure the marketing activity is compliant with local laws and regulations.

While these processes may vary, they typically require consultation, cross functional-review and approval before any content can be released in the public domain. In addition to legal and regulatory considerations, the review will also include reputational impact that should be governed by the external affairs team.

Often this review process takes time; from creative conception through to final execution, and the approval of external bodies can add to this timeline. The review process must be carefully considered with adequate timelines built into the process. Documentation of the review process should be maintained by the accountable person.

Advice on the application of additional local laws and regulations (including voluntary codes) can be sought from the local External Affairs, Legal and Regulatory teams.

Training of employees responsible for creation and delivery of marketing as outlined in 'scope' will take place annually.

Training of any agencies responsible for the creation and delivery of marketing on behalf of our company will take place annually.



Supplier name: _____

Signed by: _____

Title: _____

Date: _____ Signature: _____