



Global Marketing Code of Practice

SUNTORY
GLOBAL SPIRITS

Contents



3 The Purpose of this Code

4 How we apply the Code

5 Key marketing principles

- 6 1. Adult appeal
 - 7 2. Responsible consumption
 - 7 3. Responsibility messaging
 - 8 4. Alcohol content
 - 8 5. Dangerous activities
 - 9 6. Performance, medical and therapeutic claims
 - 9 7. Social and sexual suggestion
 - 10 8. Low and No-alcohol
-

11 Specifics for different channels and activities

- 12 Promotional events and sampling
 - 13 Sponsorships
 - 13 Digital, Electronic, and Direct marketing
 - 14 Product placement
 - 14 Licensing and POS
 - 14 Data Privacy
 - 14 Consumer research
-

15 Procedures for complying with the code

The Purpose of this Code



Suntory Global Spirits creates some of the world's finest beverage alcohol products and sells them in many different countries.

Our objectives in our sales and marketing activities are to compete for brand choice among consumers of legal purchase age (LPA) who choose to drink, and to communicate responsibly with those consumers. Our Marketing Code of Practice sets the standards for these marketing activities.

The Code applies to all our alcohol beverages, as well as any lower-alcohol and non-alcohol products, including those sold on behalf of third parties. It applies to anything that could be considered a sales and marketing activity, including all those shown in the Contents list.

Most countries have mandatory and self-regulatory advertising codes and regulations. Our Code complements these local requirements, while also providing responsible standards for countries where local regulations do not exist. In all cases, we aim to comply with this Code.



How we apply the Code

All Suntory Global Spirits personnel are required to be familiar with this Code and understand how it applies to the marketing and advertising of our products. The Code also provides guidance to those we work with who market and advertise our brands - creative agencies, market research companies, media buyers and others. They all receive a copy of the Code and must abide by its provisions in the work they do on our behalf.



For further information on the *Suntory Global Spirits Marketing Code of Practice*, or corporate social responsibility issues, please contact:

MarketingCode@beamsuntory.com

Key marketing principles

All our advertising and promotional communications must be legal, decent, honest and truthful, maintain social and ethical standards relating to gender and cultural differences, and reflect Suntory Global Spirits' commitment to corporate responsibility, including never targeting people under the LPA. We insist on all communications following the guidance here relating to:



01
Adult
appeal



02
Responsible
consumption



03
Responsibility
messaging



04
Alcohol
content



05
Dangerous
activities



06
Performance,
medical and
therapeutic claims



07
Social and
sexual
suggestion



08
Low and
No-alcohol

KEY MARKETING PRINCIPLES



01 Adult appeal

Advertising and marketing must be directed and designed to appeal to an LPA (legal purchase age) adult audience. As a minimum, the aggregate intended audience should be 70% but this number may vary country to country (for example, this figure is 85% in Malaysia, and 75% in the USA, UK, and Singapore, with an annual aggregate of 85%).

Standard actors or models used in advertising, promotional materials, and point-of-sale, who are not famous or widely recognized, must be verified to be at least 25 years of age or older, supported by proper identification, and must reasonably appear to be LPA or older.

For famous or well-known personalities, such as athletes, celebrities, sponsorship partners, spokespersons, artists, and influencers, who are generally recognizable to the intended audience, the requirement of being 25 years of age or older does not apply. However, they must be and reasonably appear to be LPA or older and should not have a primary appeal to individuals below LPA.

While we do not work with or sponsor individuals under LPA, we may work with a team or group that features a member under LPA, as long as aggregate minimum LPA thresholds are met in accordance with local laws and those under LPA don't feature individually in promotional material.

Brand Ambassadors and Distillery Visitor Centre Tour Guides may be under 25, as long as they are above LPA - see further detail below.

Brand Ambassadors and Distillery Visitor Centre Tour Guides

These roles, as long as over LPA, can conduct business-to-business interactions, tastings and tours, and build a social media profile, in line with their given specific role requirements (if these differ from this Code).

70%

minimum of
the aggregate
intended audience

25

years old minimum
age of any actors,
models, influencers,
creators, or artists

Therefore

- **WE DO NOT** depict children or use objects or images such as Santa Claus or cartoon figures that have a primary appeal to persons below LPA.
- **In the US, WE DO NOT** place messages advertising alcohol on any outdoor stationary location within 500 feet (152 meters) of an established place of worship, an elementary school or secondary school, except for on licensed premises (exact measurement may vary by region).
- **WE DO NOT** use brand logos or names on clothes, toys, games or other items intended for use primarily by persons below LPA.
- **WE DO NOT** allow messages advertising alcohol to appear in sections of publications or programming that might specifically appeal to those under LPA (e.g. comic pages).
- **WE DO NOT** associate our brands with attaining adulthood, or 'rite of passage' to it or with adolescent or juvenile behavior.
- **WE DO NOT** use the term 'spring break' or other terms associated with vacation from school.



KEY MARKETING PRINCIPLES



02 Responsible consumption

Our advertising and marketing must present our brands to consumers in a responsible manner. Our global online responsibility resource, Drink Smart, offers tools and resources to help people understand the effects of alcohol and to promote responsible drinking.

In addition:

- our marketing will never encourage excessive or irresponsible consumption or condone or promote intoxication. We do not suggest that the decision not to drink, or to drink in moderation, is socially unacceptable.
- we never associate drinking alcohol with violent, daring or anti-social activities, or with illegal drugs or drug culture.
- our messages should not be directed to pregnant women.



03 Responsibility message

In all our marketing, we include a responsible drinking message, such as our Drink Smart logo or local equivalent, or the words DRINK RESPONSIBLY. We require the message to be placed horizontally, and to be clearly legible and noticeable. Placement and exact size of the message may vary, determined by the size of the communication, the physical material used, and any existing local guidelines. In the US, this message should also be close to, and more prominent than, the mandatory advertising statement.



KEY MARKETING PRINCIPLES



04 Alcohol content

OUR MESSAGES MUST:

- display only truthful information about the alcohol strength and content.
- not emphasize alcohol strength as a positive.
- not imply that low-strength brands of alcohol will prevent abuse or intoxication.

The recommended standard serving of alcohol varies from country to country - we offer examples of regions around the world in our Get the Facts section on DrinkSmart.com.



05 Dangerous activities

- **WE DO NOT** link our products with driving or encourage or condone driving vehicles or operating machinery while under the influence of alcohol.
- **WE DO NOT** encourage participation in activities that could be dangerous while consuming alcohol. These include swimming, sailing, cycling, skiing, horse-riding, or any kind of activity that requires a high degree of alertness.
- Advertising and marketing must not feature, encourage, or condone driving mechanically propelled vehicles or operation of potentially dangerous machinery while under the influence of alcohol.
- **RECREATION:** If we suggest or depict consumption as part of relaxing after recreation or work, we make it reasonably clear that the activity requiring alertness or coordination has ended (e.g. après-ski).



06 Performance, medical and therapeutic claims

- **WE DO NOT** create the impression that consuming alcohol enhances mental ability or physical performance, or that alcohol has medicinal and therapeutic qualities, or can prevent, treat or cure a human disease (mental or physical).
- **WE DO NOT** develop or promote our brands as energy drinks or promote our brands with any products marketed as energy drinks.
- **WE DO** encourage marketers to develop and implement consumer initiatives and creative designed to highlight responsible drinking and reduce alcohol-related harm.
- **We DO NOT** make health, fitness or weight control claims.



KEY MARKETING PRINCIPLES



07 Social and sexual suggestion

We do:

- Portray alcohol consumption as part of responsible social experiences.
- Show people in an affectionate social or romantic setting, or who appear to be affluent or attractive.

We do not:

- Suggest the success of an occasion depends on the presence or consumption of alcohol.
- Claim people can attain social, professional, educational or athletic success or status because of alcohol consumption.
- Create the impression that consuming alcohol will increase confidence, popularity, social success or sexual attraction.
- Use religion or religious themes.
- Show graphic or gratuitous nudity, overt sexual activity or promiscuity, or use words or imagery that may offend prevailing standards of taste and decency.



08 Low & No-alcohol

We must:

- Always use the correct terminology for low and no-alcohol products which will vary from country to country.
- Take care to ensure that alcohol alternatives are not presented as a way to increase alcohol consumption beyond reasonable levels.
- Not market alcohol alternatives in a way likely to appeal to those under LPA or target those under LPA.



Specifics for different channels and activities

SPECIFICS FOR DIFFERENT CHANNELS AND ACTIVITIES

Promotional events and sampling



Age matters

As always, our messaging is directed only to LPA adults. For promotions and samplings, the minimum aggregate LPA audience threshold must be met in accordance with local guidelines. If local guidance varies, we revert to the strictest percentage.

We do not offer alcohol samples to those under LPA, or in or near areas that attract or appeal to those under LPA. Local guidance on sampling varies. Please ensure compliance with local regulations and consult local legal teams for questions and approvals.

In addition:

- Any staff, models or volunteers must be verified to be of LPA and have undergone appropriate responsible server training/briefing.
- Branded merchandise is not offered to and must not have a primary appeal to those under LPA.
- Branded apparel is limited to only adult sizes.

Servings offered

Sampling sizes and activities must comply with applicable local laws and be in accordance with SGS responsibility standards.

We measure samples rather than pour them freely, and do not encourage rapid consumption or 'downing in one'.

'Shot skis' or similar drinking methods, **where the consumer does not have control** over their consumption, are prohibited.

Encouraging responsible drinking

Sampling and promotional events must encourage responsible consumption and behavior, and must not encourage irresponsible, rapid, excessive or illegal consumption. We do not provide samples to anyone who appears to be impaired by alcohol or under the influence of drugs.

We must also follow all specific local rules about irresponsible drinks promotions including promotions which involve:

- The supply of an alcoholic drink free of charge or at a reduced price on the purchase of one or more drinks or one or more measures of the drink.
- Offers of alcohol as a reward or prize.

SPECIFICS FOR DIFFERENT CHANNELS AND ACTIVITIES

Sponsorships

Age matters

- We do not sponsor individuals, groups, activities or events that primarily appeal to, or are aimed at, those under the LPA.
- Before any sponsorship, we obtain reasonable data on the anticipated audience to ensure minimum LPA thresholds are met in accordance with local laws. If specific historical data is not available, we use data from a comparable event.
- We sponsor events that do not meet the percentage threshold only if sponsorship is restricted to defined areas that do meet the threshold, and we are not the main event sponsor.
- While we do not sponsor individuals under LPA, we may sponsor a team or group that features a member under LPA, as long as aggregate minimum LPA thresholds are met in accordance with local laws and those under LPA don't feature individually in promotional material.
- Competitions for tickets for sponsored events where alcohol is served, are not open to those under LPA.



Digital, Electronic, and Direct marketing

The standards of the Code apply to all media platforms, including digital media, electronic marketing, and the use of influencers, which is used to transmit commercial communications made or generated by Suntory Global Spirits.

Given the rapidly changing pace of digital media, the policies outlined may not always address a specific situation. Where our policies do not cover a specific circumstance, clearance process must be followed through Marketing, Legal, and Public Affairs.

In addition:

- All digital marketing must contain an age-affirmation mechanism for visitors to input their date of birth and country of access. If this indicates they are under legal purchase age (LPA), they must be denied access and redirected to a website such as Drink Smart.
- We always obtain consumers' consent before sending them communications, by using a positive opt-in mechanism, and each message should provide them with an easy method to unsubscribe or opt out.
- Our approved Privacy & Cookie Notice supplements this and is available to download on all sites we own and control.

SPECIFICS FOR DIFFERENT CHANNELS AND ACTIVITIES

Product placement

We review case by case, and consider approving this in movies, television or music video productions if:

- the production is directed at, and primarily appeals to, an adult, LPA audience.
- it does not feature underage, excessive, illegal or other irresponsible consumption, or aggression linked to alcohol consumption.
- the main characters are of LPA.
- we are provided with enough detailed information to prove the specific scenes and settings comply with the overall guidelines in this Code.

Without our written consent, productions do not have permission to use our brands.

Licensing and POS

We do not consider the following items appropriate for point of sale, merchandising or licensing:

- Materials primarily appealing to persons under LPA.
- Sweets and confectionery, other than gourmet chocolates or high-end items clearly intended for adults.
- Sexual paraphernalia, e.g. condoms.
- Drug-related paraphernalia.
- Guns, knives, or items generally referred to as weapons, except tools or cutlery items for culinary purposes and adult sporting activities.

Data Privacy

We strive to be transparent, accurate, and responsible stewards regarding data privacy. This builds consumer trust in the marketing process and enables marketing growth.

In addition:

- When collecting personal data from consumers, we provide a clear statement of the purpose of the collection or processing of data and our intended use of the personal data, whether it is self-evident or not, and obtain affirmative consent.
- Use of personal data should be limited to the purpose specified when it is initially collected.
- Retain personal data for no longer than is required for the purpose for which the personal data were collected or as required by law.
- Adequate security measures should be in place to prevent unauthorized access to, or disclosure of, the personal data.
- If the personal data is transferred to third parties, it should be established contractually, that they employ at least an equivalent level of security measures.
- If the personal data is transferred to third parties, it should be established contractually, that they employ at least an equivalent level of security measures.

Consumer research

We will conduct research only with consumers of LPA, and not attempt to learn about any points of view for alcohol brands they held prior to reaching LPA. We do not use consumer research from a specific market where the LPA is different, unless all research participants were over the LPA in both markets.



Procedures for complying with the code



All Suntory Global Spirits businesses must establish and adhere to processes to ensure compliance to our Marketing Code, as well as all relevant local laws, regulations, and guidance. This will include regular training in compliance with the Code for all Suntory Global Spirits personnel responsible for marketing and promotional materials and activities.

Compliance is the fundamental responsibility of our in-market business general managers.

Complaint procedures for alleged non-compliance with the Code are included on the corporate website and allow interested parties to register potential grievances confidentially. Suntory Global Spirits will evaluate alleged grievances and respond as appropriate.

Reporting Violations

Employees may report any concerns or violations online at <https://beamsuntory.ethicspoint.com>

Or contact Global Compliance at global.compliance@beamsuntory.com.

Reporting Hotline phone numbers can be found in the Suntory Global Spirits **Code of Conduct** document.

SUNTORY
GLOBAL SPIRITS



DRINK  SMART®

www.drinksmart.com