

Code Lion

**OUR POLICY FOR
RESPONSIBLE MARKETING**



LION

Our policy for responsible marketing



Introduction



**Laws, codes
& ethics**



**Product-related
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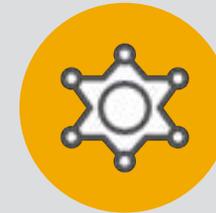
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Laws, codes & ethics



Laws, codes & ethics

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This Code is our minimum standard in Australia and New Zealand and should be used as a reference for all marketing and commercial activity irrespective of channel or media. Compliance to the letter and the spirit of the Code is mandatory for all Lion people, partners and agencies and will ensure that all marketplace activity is:

- ▶ Responsible
- ▶ In line with prevailing community standards and expectations
- ▶ In line with pro-social cultural norms in relation to alcohol and behaviour
- ▶ Consistent with the aims of not contributing to the problems of alcohol misuse

In addition to this Code, marketing and commercial activities must comply with local standards and regional codes, policies or legal commitments. Where local laws, regulations or codes of practices are more stringent, those additional requirements must be met.

Our marketing must conform to the highest standards of business ethics and commercial integrity, be legal, decent, honest and truthful. We will depict material in line with prevailing community standards, and we will always respect human dignity and integrity.



The Code is applicable to all markets and to all forms of brand marketing and commercial communications and promotions, including but not limited to:

- ▶ Traditional Above the Line Advertising
- ▶ Digital advertising
- ▶ Website content
- ▶ Social media channel advertising
- ▶ Social media community communication
- ▶ Ambassadors and Influencers
- ▶ Brand naming, packaging and labelling
- ▶ Sponsorship
- ▶ Point of sale materials
- ▶ Merchandising
- ▶ Consumer and trade PR
- ▶ Consumer and trade promotions
- ▶ Brand events
- ▶ New product development, product reformulation and insight generation
- ▶ Product sampling (in-store or at an event)

Product related requirements



Product related requirements

Part 1

Part 2

We will give clear, factual information about our products as it's important to help consumers make informed decisions about consumption.



Alcohol strength

- ▶ We are open and transparent about the alcohol content of our products; but we do not promote a product's high alcohol content as a reason to choose or consume the product.
- ▶ The alcohol strength of a product must be communicated on alcohol packaging but only in a secondary, simple, factual and non-emotive way that is not part of a creative idea. Descriptive words or imagery which draw attention to the strength of the product should also be avoided.
- ▶ The alcohol strength of a product may be the lead feature in marketing communication if the product is a lower or zero alcohol variant.



Pregnancy warning label

- ▶ The prevailing health advice is to avoid alcohol if you are pregnant, considering pregnancy or breast feeding.
- ▶ We are committed to providing advice on labels that consumers should not be drinking while pregnant.
- ▶ In line with this standard and in support of global industry commitments, we will ensure all Lion alcoholic products carry words or symbols that communicate this message.



Not for Minors label

- ▶ We do not want any minors consuming our adult products, neither alcoholic products nor non-alcoholic extensions of alcoholic master brands.
- ▶ We will ensure all Lion products display on the label that adult products are "not for minors".
- ▶ This message can be carried via words or symbols as best suited to the local context.

Product related requirements

Part 1

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We will give clear, factual information about our products as it's important to help consumers make informed decisions about consumption.



Non-alcoholic products

- ▶ We only promote zero alcohol, alcohol-free and non-alcoholic beers, wines or spirits to adults who can legally drink alcohol.
- ▶ We will ensure non-alcoholic or low alcohol products that are linked to existing alcohol brands or Masterbrands are positioned as an adult drink & adhere to the Code.
- ▶ When listing alcohol content, we will do it in a simple and straight-forward way. Clearly display the 0% message or logo to distinguish from alcoholic products.
- ▶ Non-alcoholic variants of alcohol Masterbrands must adhere to all placement rules of the Masterbrand.



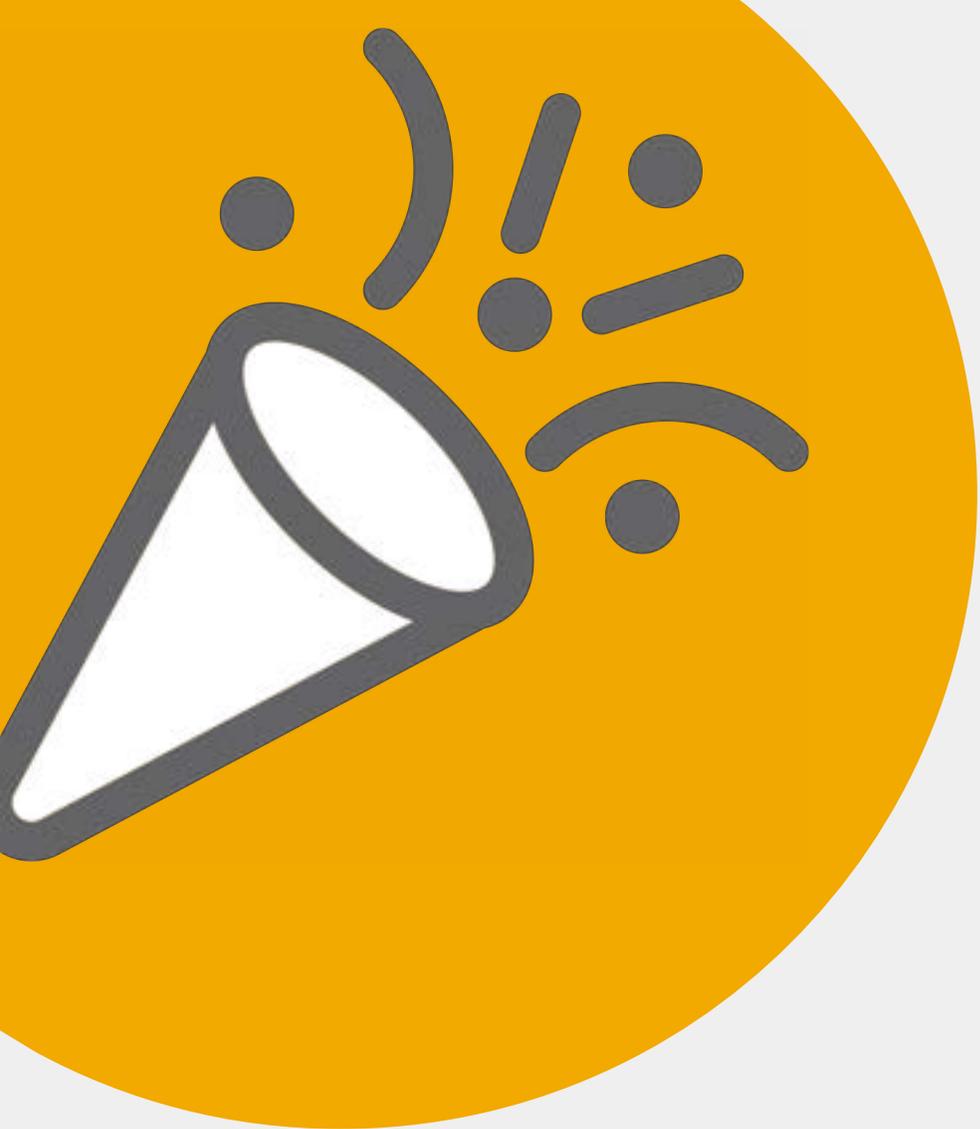
Nutrition and health related claims

- ▶ Alcoholic beverages must not make any health claim or nutrition benefit claims; in promoting our brands, we must not claim or suggest that consuming the product will confer health benefits or therapeutic outcomes.
- ▶ Factual composition information such as energy, carbohydrate or gluten content are allowed when clearly marked and permitted by local regulation. The product label must contain a Nutritional Information Panel if a claim is made.



Alcohol and energy drinks

- ▶ We will not produce, promote or sell alcohol and energy products that contain excessively high levels of taurine or caffeine.
- ▶ We will not promote any beverage alcohol product or beverage alcohol combination as delivering energizing or stimulating effects.



Marketing content



Marketing content – Consumption

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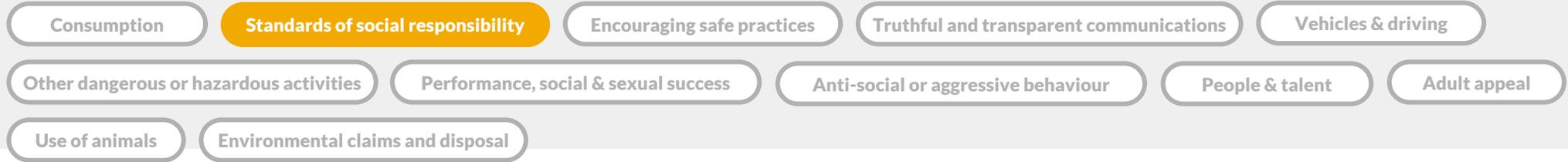
CONSUMPTION

When marketing materials depict the consumption of our products, we will comply with the following criteria:

- ▶ We will show people drinking at a sensible pace
- ▶ We will make it clear that an appropriate period of time has elapsed between drinks if a person is shown to have more than one drink
- ▶ We will not depict behaviour that could reasonably be interpreted as suggesting intoxication
- ▶ We will not show images of peers applying pressure to others to drink more than they would otherwise intend to drink
- ▶ We will not challenge or dare people to sample a product, particularly in a manner that would suggest the product has an illicit or dangerous quality to it
- ▶ We will never depict abstinence or moderation in a negative, foolish or entertaining way. Communications should respect for the choice to abstain from alcohol
- ▶ While it is acceptable to show our products as an accompaniment to a relaxing situation, we will not suggest that the product itself has enabled, or contributed in any way, to relaxation



Marketing content – Standards of social responsibility



STANDARDS OF SOCIAL RESPONSIBILITY

- ▶ We will respect everyone. We will not use any images, symbols, figures or language that are likely to be considered gratuitously offensive or demeaning to any gender, race, ethnicity, religion, culture, sexual preference, disability or minority group
- ▶ While it is entirely appropriate to use a range of people within our communications, we will not use gratuitously exploitative, degrading or erotic sexual imagery, messages or innuendo
- ▶ We will not depict or suggest predatory sexual, violent or anti-social behaviour
- ▶ We will not employ misrepresentations or distortions of the truth in communications, especially to disparage our competitors' products or goodwill. Any comparisons will be supported by legal advice
- ▶ We will only use language which is appropriate in the circumstances. Strong and obscene language shall be avoided



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Marketing content – Encouraging safe practices



ENCOURAGING SAFE PRACTICES

- ▶ Our marketing communications will not depict material contrary to prevailing community standards on health and safety and we will take reasonable steps to ensure they do not have any unintended consequences
- ▶ We will not depict or encourage images or practices that are likely to result in reasonable people placing themselves in unnecessary danger, or that are likely to have an adverse health impact.
- ▶ Communications will not depict or be addressed to at-risk groups and will never show a pregnant woman drinking alcohol or encourage pregnant women to drink alcohol.
- ▶ We will only prominently feature people who are over 25 years of age, unless there is no suggestion that they have just consumed or are about to consume alcohol and they are part of a natural crowd or background scene.



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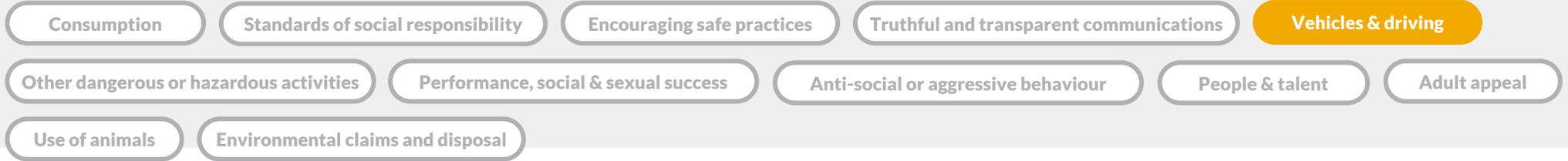
Environmental claims and disposal

TRUTHFUL AND TRANSPARENT COMMUNICATIONS

- ▶ All content will be truthful, authentic and not make representations or claims that are likely to mislead or deceive consumers
- ▶ All product-related claims & statements must be substantiated, reviewed and approved by the local Legal function
- ▶ We must obtain written consent to use third party content in our marketing communications, such as logos, artwork, music and photography not created by Lion or our agencies
- ▶ Claims relating to sponsorships, approvals, endorsement or certification schemes must be current
- ▶ Testimonials must reflect a genuine, informed and current opinion of the person giving the testimonial

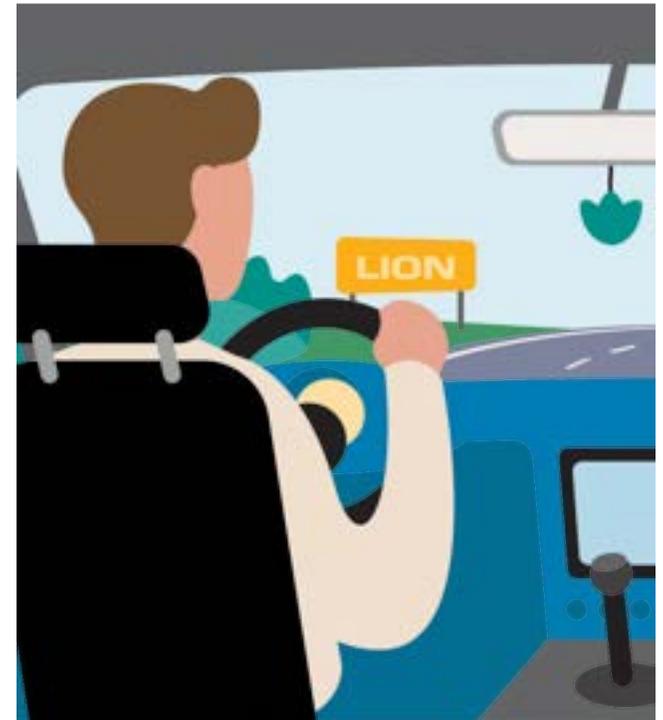


Marketing content – Vehicles & driving



VEHICLES & DRIVING

- ▶ Except in the case of non-alcoholic brands, only depict drinking after an event involving motor vehicles
- ▶ We won't depict or suggest drinking is acceptable before or while driving motor vehicles or motorised equipment
- ▶ Ensure depiction of vehicle use aligns with prevailing community standards including wearing seatbelts, abiding by road rules and speed limits



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OTHER DANGEROUS OR HAZARDOUS ACTIVITIES

- ▶ As to what constitutes an activity that would be dangerous to drink during or prior to, we should take our lead from the reasonable standards of the communities in which we operate
- ▶ We should not depict the consumption of alcohol taking place before or during the engagement of activities that require high degree of alertness or physical co-ordination in our marketing communications. This includes:
 - Operating a vehicle, boat or heavy machinery;
 - Being in an industrial location or building site while work is in progress; or traversing a clifftop or building near the edge;
 - Conducting a medical procedure;
 - Swimming or watersports
- ▶ Avoid association or promotions with properties, events or activities that could be considered excessively dangerous or hazardous.



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PERFORMANCE, SOCIAL & SEXUAL SUCCESS

- ▶ While our products are accompaniments to such situations as socialising, celebrating or being on a date and it is acceptable to depict these types of situations, we will not suggest that the consumption of any of our products has either directly or indirectly led to or been a factor in contributing to any kind of professional, financial, sporting, social or sexual success.
- ▶ Specifically, in relation to sexual success, we must avoid depicting consumption as:
 - Increasing someone's attractiveness
 - Aiding seduction or lowering inhibitions
 - A prelude to sexual intimacy
 - Enhancing sexual performance
 - An accessory to sexual activity



Marketing content – Anti-social or aggressive behaviour

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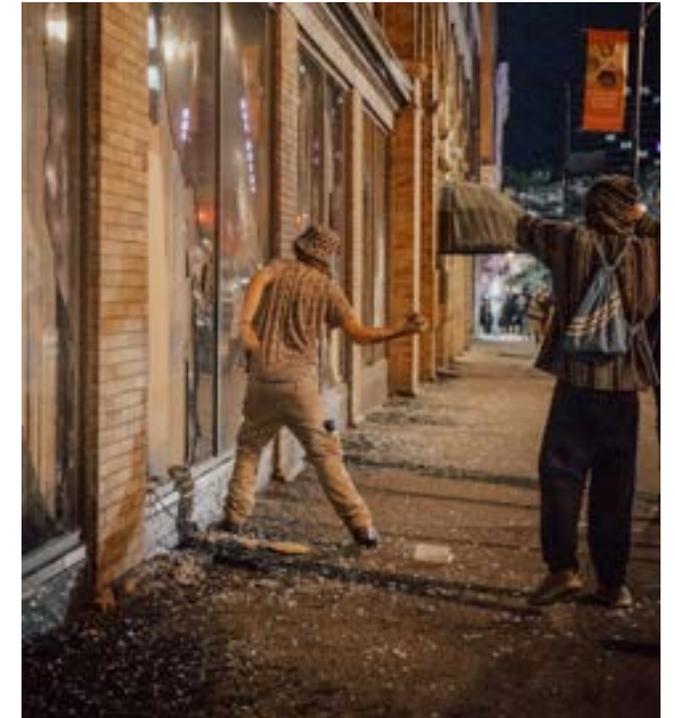
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ANTI-SOCIAL OR AGGRESSIVE BEHAVIOUR

- ▶ We will not associate the consumption of any Lion products with violent, aggressive, dangerous or antisocial behaviour. Anti-social behaviour can be defined as activities that might cause reasonable people to become distressed, annoyed or inconvenienced
- ▶ We will never depict fighting, violence or aggressive behaviour beyond that employed in sporting activities in line with community standards of acceptable practice in sport
- ▶ We will not associate, use language, mimic or profile means of consumption of tobacco, e-cigarettes, vaping, illegal drugs, drug culture or behaviour associated with illicit substances



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PEOPLE & TALENT

- ▶ We will respect everyone and will portray people positively, with respect and decency
- ▶ We will not use any images, symbols, figures or language that are likely to be considered gratuitously offensive or demeaning to any gender, race, ethnicity, religion, culture, sexual preference, disability or minority group
- ▶ We will not engage paid talent who are under 25 years of age



Marketing content – Adult appeal

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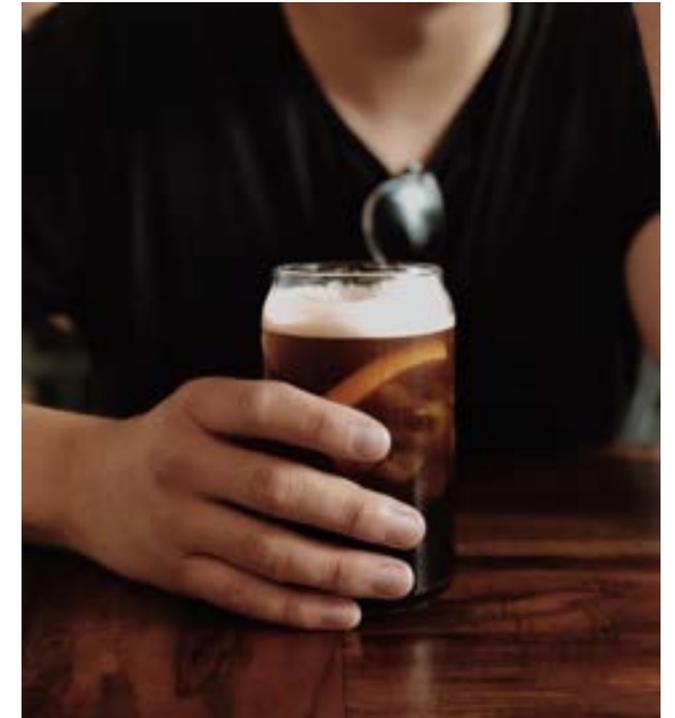
Adult appeal

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ADULT APPEAL

- ▶ Lion does not target people under legal drinking age with any of our marketing
- ▶ We will not employ any symbol, image, character, location, place, personality, music or language that is primarily intended to appeal to persons below the legal drinking age
- ▶ We exclude any symbol, image, character, location, place, personality, music or language thing with predominant appeal to minors from being used
- ▶ Branded merchandise may only be sold in an age-gated environment (for example, in licensed on-premise or off-premise stores or through Lion digital platforms)
- ▶ Careful attention must be paid to animation or illustrated elements of any material to ensure they appeal only to adults
- ▶ Our advertising, logos and brand assets will not appear on any clothing, games or any other merchandise primarily intended for under people under legal drinking age. All merchandise clothing must be clearly labelled as “Adult Size” only



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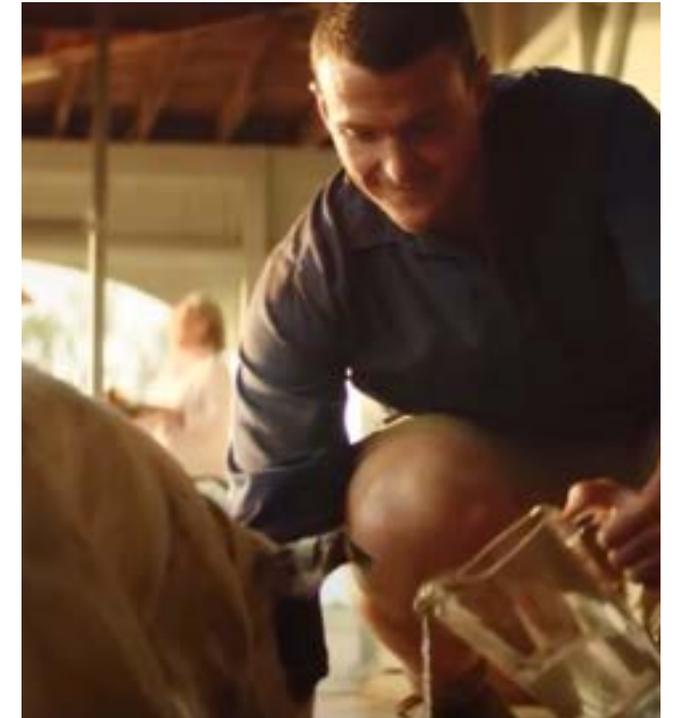
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USE OF ANIMALS

- ▶ We will treat animals with respect and we will not depict any maltreatment or violence to animals
- ▶ Where appropriate, we will engage animal handlers and/or owners while on location
- ▶ Animals may only be used if incidental to the marketing communication and must never be seen engaging directly with, or consuming, our products



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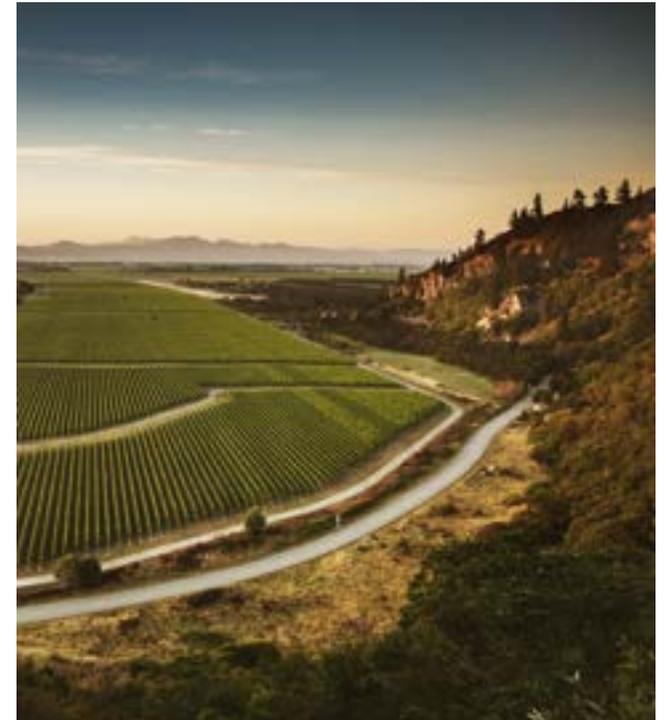
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Marketing content – Environmental claims and disposal



ENVIRONMENTAL CLAIMS AND DISPOSAL

- ▶ When we communicate claims about a brand's environmental credentials to consumers, or use our brands to celebrate our environmental performance, all claims must be truthful and factual; relevant to the product or service and its actual environmental impacts; and substantiated and verifiable ensuring it is in line with the principles of transparency and accountability
- ▶ We will not depict littering or otherwise inappropriate means of disposing our containers and packaging except when making a proactive statement for proper disposal or recycling
- ▶ Environmental claims must be able to be substantiated and verifiable. Supporting information must include sufficient detail to allow evaluation of a claim
- ▶ Any environmental claim relating to future matters or commitments must be based on reasonable grounds



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Communications channels and placement



Communications channels and placement

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COMMUNICATIONS CHANNELS AND PLACEMENT

- ▶ Alcohol brand material must only target adult consumers; therefore, all reasonable steps must be taken to ensure the audience is predominantly over the legal drinking age
- ▶ Communications must only be placed in media which can reasonably be expected to meet stated audience composition targets, where at least 80% of the audience is of the legal drinking age. Demographic information and audience insights will be sought to inform and assist decisions and provide justification
- ▶ Similarly, we will only associate with events where it is reasonable to expect the usual attendance over legal drinking age will make up at least 80%
- ▶ These standards apply to all channels and touchpoints including digital and social media channels and platforms, non-digital media (e.g. broadcast, cinema, print), sponsorships, events, product placement, ambassadors and influencers
- ▶ We will not place any of our advertising materials (e.g. billboards, street furniture, street posters) in close proximity and within clear view of a primary or secondary school. We will work closely with outdoor media buying agency and its vendors to ensure this policy is adhered to when determining placement of advertisements for our portfolio of brands.



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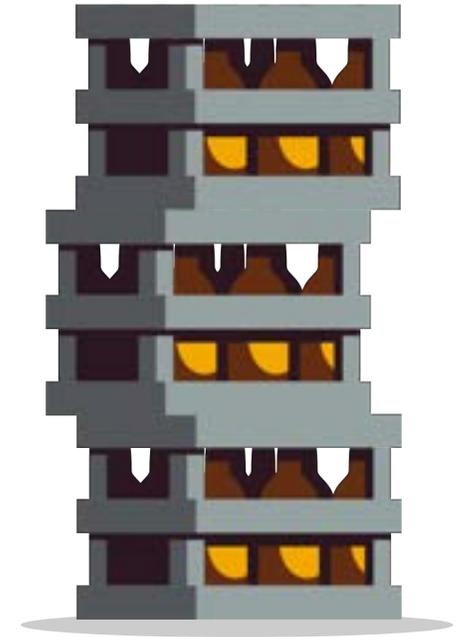
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BRAND EXTENSIONS

- ▶ The logos or trademarks of our chiefly alcohol branded products should only be advertised on third party non-alcohol products that do not have a strong or evident appeal to minors.



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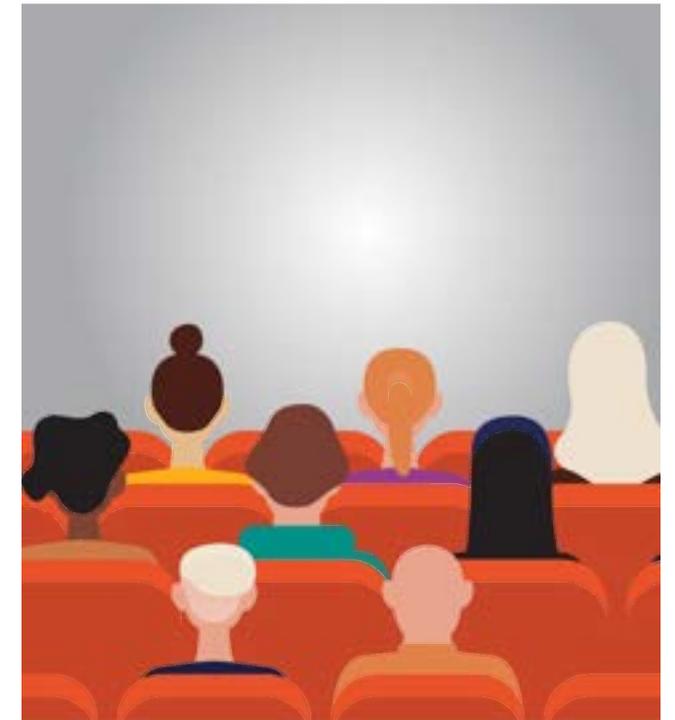
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PRODUCT PLACEMENT

- ▶ When we have influence in terms of how our brands or product categories are depicted within a TV program or film, we must ensure they are not associated with or portrayed to contribute to the problems of alcohol misuse, obesity, or excessive consumption
- ▶ All product placement is subject to a written letter of consent to depict our products on screen.



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SPONSORSHIP

- ▶ We will not engage in any kind of sponsorship or partnership with events, programs or awards aimed at or associated with people under legal drinking age
- ▶ Players and participants of sponsorships must all be over legal drinking age
- ▶ We will not engage in sponsorships of teams or groups who are under 25 years of age unless the group is five or more players and these players are a representation of the sporting team rather than individual endorsers
- ▶ Alcohol beverages at events we sponsor must be served responsibly and in accordance with applicable legal requirements for the responsible service of alcohol (which precludes the serving of alcohol to people under the legal drinking age)
- ▶ When using promotional staff or brand ambassadors in a licensed environment, they must be at least legal drinking age and will promote consumption patterns that are consistent with responsible consumption, as defined by this Code



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CELEBRITIES & INFLUENCERS

- ▶ Where a commercial relationship exists with social media influencers or talent to help promote our brands, the content must be clearly distinguishable as advertising material
- ▶ Advertising disclosure is required when there is a contracted engagement with influencers including gifts or in-kind payments
- ▶ All influencers must make clear, unambiguous & timely declarations indicating the commercial relationship using the advertising disclosure tools available within the platform. For example, for short-form video, use screen supers at the beginning & captions where applicable
- ▶ For platforms that use hashtags, the required minimum disclosure is #ad; or #sponsored. As part of a commercial relationship with an influencer, an agreed process will be established that ensures content created is consistent with this Code
- ▶ Where available on the digital platform, all paid influencers must age gate posts to prevent minors from viewing content.
- ▶ All paid influencers must be at least 25 years old and must appeal to primarily adult audiences.
- ▶ They must have no known history of serious alcohol-related offenses or feature any posts that depict irresponsible alcohol consumption.





Digital and social media



Digital and social media – Digital guiding principles

Digital guiding principles

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DIGITAL GUIDING PRINCIPLES

The digital guiding principles (DGPs) are aimed at strengthening and expanding marketing codes of practice on digital / social platforms at a global level as part of the Beer, Wine and Spirits Producers' Commitments to Reduce Harmful Drinking. As part of the International Alliance for Responsible Drinking (IARD), Kirin and Lion have pledged to implement the following five safeguards:

1. An age affirmation mechanism:

- ▶ Access to alcohol commercial communications should be restricted to adult consumers only
- ▶ Whenever possible/relevant, consumers have to enter their full date of birth and select their country of residence
- ▶ While proof of age requests upon entry into websites can be written in language consistent with a brand's values, the entry mechanism should not dare the consumer to enter into the site or in some way make a joke of the fact that the mechanism is required
- ▶ Where appropriate, age affirmation mechanisms should link to responsible drinking information
- ▶ If the applicant is underage, they must be directed to the local market's responsible drinking advocacy homepage or to a pop up with the following message: "We support the responsible consumption of promotional alcohol. This content is restricted to those over the legal drinking age"

2. A Forward Advice Notice (FAN):

- ▶ Consumers need to be informed and reminded of their responsibility that alcohol commercial communications should not be shared with underage people. This is not applicable for mobile apps and is required for any website that contains forward-able or shareable content
- ▶ Examples include: "Please only share our posts with those who are of legal drinking age"; "Forward to those of legal drinking age only"; "Please do not share or forward to anyone underage."

3. A Responsible Drinking Message (RDM):

- ▶ It must be clear that all Lion brands are committed to responsible drinking and that they strongly urge their consumers to enjoy their products in moderation.
- ▶ The RDM must at least be included on the main page, or the homepage. It should be well visible. For social media, the RDM can either be included in the profile's description, or 'about' section, or in the profile picture or cover photo.
- ▶ All digital assets will carry responsible consumption messages and link to responsible drinking information
- ▶ Examples include: DrinkWise links, CheersNZ! or DrinkAware.

4. A transparency statement / official account:

- ▶ Digital marketing activities shall be carried out in a transparent way in order to avoid misleading consumers about their commercial purpose. Identifying the brand's official accounts also helps differentiating the unofficial pages from the fan pages, which may not implement safeguards.
- ▶ On Facebook, Twitter and Instagram, the official verification badge is required. For other social media platforms and apps, a simple sentence such as: This is the official app of <insert brand> is sufficient. For websites the trademark, terms and conditions and company information is sufficient.

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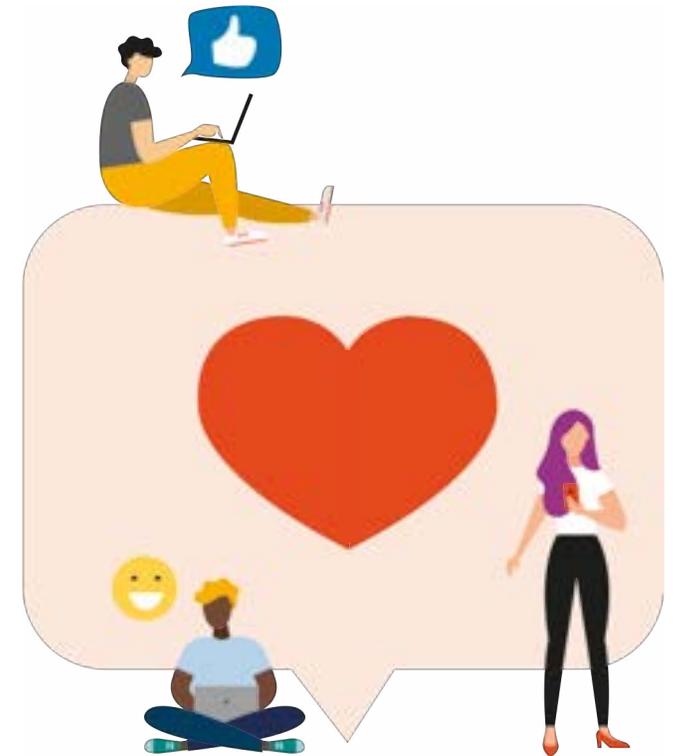
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USER GENERATED CONTENT COMMUNITY GUIDELINES

- ▶ We will not condone any user-generated content (UGC) that would promote inappropriate or excessive alcohol consumption, or indeed any content that contravenes this Code or any aspects of local codes or contexts.
- ▶ We will only re-share or post UGC that is consistent with the Code and with permission.
- ▶ Consumers must be informed that UGC is monitored and any irresponsible content of this sort will be taken down. Policies relating to UGC should be available on the page’s ‘ABOUT’ section and consumers alerted with statements such as: “Please see our rules for engagement: [link to website]”. UGC on Lion-controlled digital platforms will be moderated frequently
- ▶ To mitigate the risk of irresponsible content we will:
 - Not make any use of UGC that obviously incorporates third party content e.g. a famous song or a famous photo/image that obviously has not been taken by the end user;
 - Not make any use of UGC that incorporates third party logos / trademarks (especially logos/trademarks of competitors);
 - Ensure that the author is clearly attributed; and
 - Implement a swift takedown policy should the end user / copyright owner complain.



Digital and social media – Parental controls

Digital guiding principles

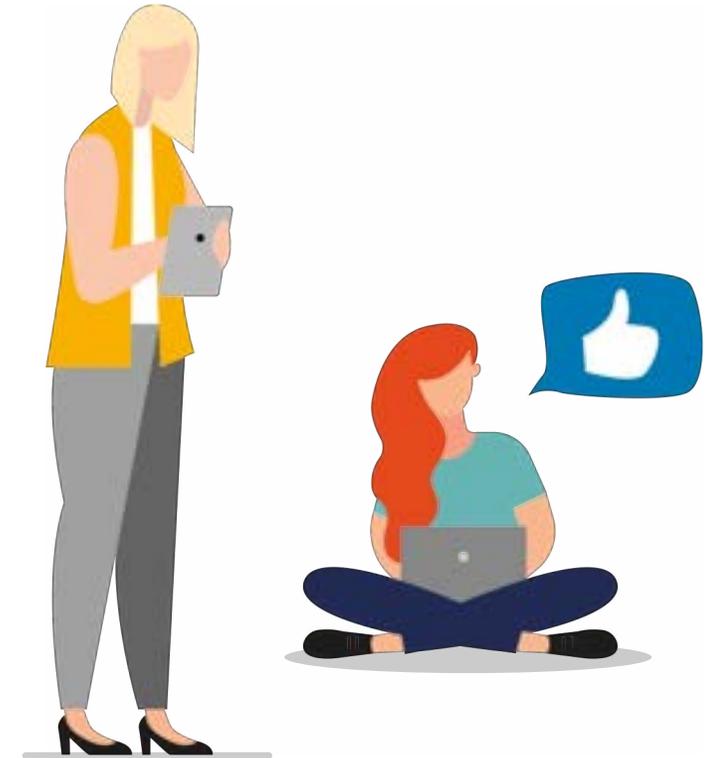
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PARENTAL CONTROLS

- ▶ We recognise parents play a crucial role in educating their children about the legal and responsible use of alcohol and may wish to prevent their children from accessing internet websites without parental supervision
- ▶ To enable parents who choose to prevent their children from accessing internet websites unsupervised, we will provide parental control software manufacturers with the website addresses of each of its existing sites upon request and allowing parents the choice to block access



Digital and social media – Privacy

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PRIVACY

- ▶ We will ensure all marketing activity follows the applicable privacy laws of the relevant local market and provide consumers with clear data privacy statements
- ▶ We will seek consumer consent for all types of direct communications and provide a clear and transparent opt-out mechanism
- ▶ We will take all reasonable efforts to avoid sending direct communications to people under legal drinking age
- ▶ We will take reasonable steps to ensure personal information is protected from risks such as misuse, interference, loss and unauthorised access, use, destruction, modification or disclosure
- ▶ Lion's Privacy Policy is available on the Lionco website at <https://lionco.com/legal/privacy-policy/>



Responsible promotions and events



Responsible promotions and events

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- ▶ We will not discourage people from choosing to drink non-alcoholic beverages rather than alcoholic beverages and those who do choose to drink alcohol will be encouraged to do so responsibly
- ▶ We will not place pressure on people to participate in our promotional activities
- ▶ We will not engage or promote games that require excessive drinking as an element of the game
- ▶ Consumers must always have control over the delivery of the alcohol consumed
- ▶ Water and/or soft drinks must be available during all events.
- ▶ We will limit open bar sponsorships to reputable events where attendance is strictly limited to people at least of legal drinking age, or where all servers have been certified as trained on responsible serving of alcohol
- ▶ We will promote the use of a designated driver or alternative transport means for participants to return home safely.

ENSURING A SAFE WORKING ENVIRONMENT

- ▶ We will create a safe working environment for promoters of our brands across all aspects of their role including working times, places, transport, uniform, incentives, tasks and behaviour. We will not deploy brand promoters if we cannot meet the required conditions for their safety.





Compliance



Compliance

Compliance with both the letter and spirit of this Code is mandatory for all employees of Lion, its subsidiaries and joint ventures. Compliance also applies to third party agencies, contractors & consultants who are engaged by or acting on behalf of Lion and responsible for or involved in marketing and marketing activities for our brands. The Code applies to the reasonably foreseeable impact on a reasonable person within the type of people to whom the communication is directed and other persons to whom the communication may be communicated taking into account the content or approach as a whole.

Accountability

Compliance to the Code is everyone's responsibility. All Lion people are required to have full knowledge of the Code and are responsible for following it in letter and spirit. Equally, we require our external partners and agencies involved in the marketing and promotion of our brands to have comprehensive understanding of the Code and their obligations to implement it across everything they do.

Lion cannot be held responsible for activities of third parties outside of our reasonable control. Examples of activities or marketing communications that are not likely to be within our reasonable control include unauthorised product fan sites or product placement over which we have had no reasonable control.

Governance

All commercial communication will be reviewed for compliance according to the local approval process involving the Marketing, Legal and Corporate Affairs functions.

Marketing Directors are accountable for ensuring all activity is compliant with this Code.

Feedback about the Code is welcomed and can be directed to Lion Corporate External Relations function who maintain and manage it internally throughout Lion.

Training and education

All Lion people involved in the marketing of our brands will receive training on the Code. Newly recruited Lion staff will receive training on the Code as part of their induction and regular refresher training should be provided for relevant staff on an annual basis. Equally, our external agencies and partners are required to complete annual training.

Contracts and agreements

Where appropriate, include reference and conditions to comply with the Code as a term in new contracts of engagement for marketing and promotional services.

Complaints

Any complaints or criticisms of Lion's marketing activities should be reported immediately to the local Legal, Marketing or External Relations teams in order to review the complaint, take the necessary action and maintain our commitment to responsible marketing.

Each local market must establish a transparent and accessible process for complaints.

All correspondence regarding complaints must be properly addressed and stored and registered for audit purposes.

Support / More information

When in doubt about the correct interpretation of the Code, contact your Legal and External Relations teams for support.

 Introduction

 Laws, codes & ethics

 Product-related requirements

 Marketing content

 Communications channels and placement

 Digital and social media

 Responsible promotions and events

 Compliance

Code Lion



LION