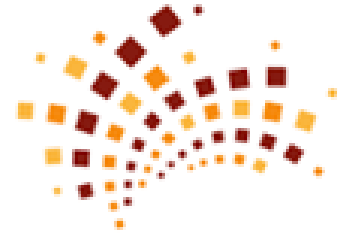


C&C group plc



Responsible

Marketing

Code

Policy Governance Sponsor: General Counsel and Company Secretary

Prepared by: Tristan Turnbull, Senior Legal Counsel

Responsibility for document management: C&C Group plc Legal Department

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Approved by: C&C Group plc Board of Directors and signed by CEO

Introduction

At C&C Group plc ('**C&C**' or '**the Group**') we acknowledge the key role we play in social responsibility in the local communities we serve. We are 100% committed to the responsible marketing of alcohol and promoting the moderate consumption of the products we manufacture and distribute, to ensure they are enjoyed safely by consumers.

In all marketing communications, C&C strives to adhere to all applicable legislation, and the self and co-regulatory codes which C&C is subject to, in each of the relevant jurisdictions in which we publish marketing communications, including (**without limitation**):

- **in the UK** - the Committee on Advertising's code on [Alcohol Advertising](#) in non-broadcast media, and the relevant [UK Code of Broadcast Advertising](#), the [CAP Advertising Guidance on Alcohol Alternatives](#), all as administered and enforced by the Advertising Standards Authority (ASA), as well as the Portman Group's [Code of Practice for the Naming, Packaging and Promotion of Alcoholic Drinks](#) and [Sponsorship Code of Practice](#)); and
- **in Ireland** - the [Code of Standards for Advertising and Marketing Communications in Ireland](#), as administered by the Advertising Standards Authority for Ireland, and the [Responsible Messaging Guidelines](#), [Alcohol Marketing, Communications and Sponsorship Codes of Practice](#), and [Broadcast Authority of Ireland, Commercial Communications Code](#).

In the remainder of this Responsible Marketing Code, we refer to all legislation and codes of practice which are applicable to C&C in respect of its marketing communications, as the "**Regulatory Requirements**".

C&C's Responsible Marketing Code (the "**RMC**") is the basis of our commitment, its Pillars guiding every aspect of our marketing activities including but not limited to research and development, communications, promotion, sponsorship, experiential, sampling and packaging. Central to the RMC is ensuring that all our marketing activities are only ever directed at adults over the legal purchasing age in the relevant location ("**LPA**"), and to encourage the moderate consumption of our products.

The RMC is mandatory for all our marketing, sales, promotion, and communications activities for both the brands which we own, but also for third-party brands where we control (and are responsible for) the marketing of such brands (collectively in the RMC, called the "**Brands**"). The principles of the RMC apply to both traditional and digital media to ensure our Brands are advertised and marketed responsibly.

The Group is focused on embedding the principles of the RMC across the organisation, including integrating its principles in wider corporate culture and ensuring the core values of the Group are aligned to the RMC; to respect people and our planet and aim to bring joy to life; and ensuring quality is at the core of everything we do.

C&C is fully committed to taking all reasonable steps designed to ensure that our alcoholic products are consumed responsibly, and we acknowledge and accept our vital role which our marketing activities and product communications have in achieving that.

At C&C, our Environmental, Social and Governance ("**ESG**") strategy is directed by our Group purpose of 'Delivering joy to customers with remarkable brands and service'. One of the six Pillars of our ESG strategy is ensuring alcohol is consumed responsibly. Our structured and ambitious programme of continuous improvement will ensure we meet our ESG vision of 'Delivering to a better world'.

Scope

The RMC applies to all activities intended to promote and market the Brands. These activities include, but are not limited to:

- Advertising, including traditional TV, radio, Out of Home and print media.
- Digital media including, websites, mobile, billboards and social media.
- Branding, packaging and labeling
- Product development
- Trade advertising and promotional activities in the on and off-trade
- All sales materials
- Market research
- Consumer advertising, brand-related communications, and relationship marketing
- Brand promotions
- Product placements
- Brand sponsorships, including sports, music, culture, groups, events, and celebrities.
- All branded merchandise
- Experiential marketing and events

The term "**marketing**" is used throughout the RMC to cover all of the above activities, and any other activity which we carry out in order to promote, market and sell the Brands.

Compliance with the RMC is mandatory for all our marketing operations and sets the minimum standard for all of our marketing activities.

This version of the RMC is the current and most up-to-date version and replaces all previous versions of the RMC with effect from **TBC**. We reserve the right to update the RMC at any time at our discretion. Any updated version of the RMC will be published on our website at: [Policies & Terms – CC \(candcgroupplc.com\)](https://www.candcgroupplc.com/policies-terms)

Code Compliance

- I. Compliance with the RMC is mandatory for all employees of C&C, our subsidiaries and joint ventures where C&C has a controlling interest.
- II. All provisions of the RMC must be adhered to and no one within C&C should ever cause, authorise or overlook breaches of the RMC by others.
- III. C&C shall implement a system of training for our relevant employees to ensure that they are aware of the requirements of the RMC. All colleagues working in marketing, communications, corporate affairs and legal must (at least every two years) undertake mandatory training on the Regulatory Requirements (as applicable).
- IV. All new colleagues, in marketing, communications, corporate affairs and legal functions, should undertake the training on the Regulatory Requirements within three months of starting their role.
- V. We shall maintain a record of all certified training offered and completed by our colleagues.
- VI. When contracting with Marketing Agencies who support C&C colleagues in the development of our marketing activities – Agency staff working on our campaigns must have undertaken training on the relevant codes of practice, and this will be included as a requirement as part of any relevant tender process.

- VII. In the development of marketing activity, C&C colleagues and marketing agencies will utilize Advisory Services offered by e.g. Portman Group, ASA and CopyClear on how to market and promote products in line with the Regulatory Requirements.
- VIII. We shall undertake due diligence on our suppliers and distributors to ensure that they maintain good industry practices and remain aligned with C&C principles of ethical business.
- IX. We will closely monitor our compliance with the RMC and the Regulatory Requirements, and we may self-report any breaches of the Regulatory Requirements which we become aware of.
- X. If you think that any of our marketing activities have breached any of the principles set out in this RMC, or any provisions of applicable legislation and/or industry codes, please let us know by contacting us at: Consumer.Relations@candcgroup.ie.
- XI. We take all complaints and suggested breaches by us of the RMC, applicable laws and/or relevant industry codes extremely seriously, and we are committed to promptly investigating any such complaints / claims in accordance with C&C's internal governance procedures and applicable law.

Responsibility

- I. All C&C employees involved in our marketing activities have a responsibility to comply with, and ensure that C&C complies with, the provisions of the RMC.
- II. The RMC should be provided to any third parties with whom C&C has a relationship in relation to the marketing of the Brands. The requirement to comply with the RMC must be included in the contracts C&C enters into with all such third parties, including (without limitation) any third-party distributors who are responsible for, or are involved in, the marketing activities and marketing of the Brands. For the avoidance of doubt, no third parties should be marketing the C&C Brands without C&C's express approval.

Values

Our ethos is simple, our employees should work in a safe and healthy workplace. As a drinks business, we are also committed to promoting responsible alcohol consumption.

The underlying principle governing the RMC and our marketing activities generally, is our goal of ensuring that alcohol is consumed responsibly. As part of that goal, we set ourselves four key aims:

- I. Introducing 0% and low alcohol variants.
- II. Reducing ABV & calories.
- III. Active support for industry programmes including Portman Group and Drinkaware (UK and Ireland); and
- IV. Support relevant charities.

We are committed to achieving these aims and we continue to take steps as a business and in our day-to-day activities towards fulfilling them.

C&C will work in a variety of ways with different stakeholders to promote responsible drinking and combat alcohol misuse.

Key Pillars

1) Laws and Ethics

- I. C&C is 100% committed to responsible advertising and marketing of alcohol and adherence to all applicable Regulatory Requirements in the relevant jurisdictions the communications are published in.
- II. We comply with the letter and spirit of Regulatory Requirements in relation to all marketing activities undertaken in respect of the Brands. Where the provisions of Regulatory Requirements are more stringent in any respect than any conflicting provisions contained in the RMC, C&C shall comply with the provisions of the relevant Regulatory Requirements.
- III. All products and associated communications must be presented to consumers in an ethical and socially responsible manner to allow consumers to make an informed choice based on accurate and fact-based information which is not misleading, including the promotion of their social, sustainability and environmental credentials.
- IV. We must avoid any marketing communications that could be considered unlawful, dangerous, violent, inappropriate, in poor taste or disrespectful.
- V. Packaging, websites and any marketing communications, must provide clear, factual, and neutral information about the alcohol content of the Brands.
- VI. We will comply with all applicable government-mandated health messages and/or warnings in our marketing communications, in accordance with the applicable laws and regulatory requirements in the relevant location.
- VII. We will comply with all Regulatory Requirements relating to mandatory labelling which are applicable in each of our marketing locations, in relation to our products.

2) Respect

- I. We must remain culturally and socially conscious and respectful in any marketing communications.
- II. We serve consumers from a wide range of different cultural and social backgrounds and are respectful of diversity and inclusion. Our marketing will seek to promote diversity and inclusion and reflect a modern, equal society.
- III. We take a measured approach when considering how we advertise and market our products and our Brand sponsorship associations.
- IV. Third parties we choose to be associated with as part of the advertising and marketing of our products are aligned with our core value of respect for people and our planet.

3) Responsible Consumption

- I. C&C advocates the safe and responsible consumption of alcohol, at all times, and promotes moderation to reduce the misuse of alcohol.
- II. We use our marketing assets to promote responsible consumption and are active members of the Portman Group, Drinkaware and Drinkaware.ie.
- III. Marketing communications must not portray or suggest any association with excessive drinking, anti-social or illegal behaviour.
- IV. We must provide a clear and appropriate responsible drinking message in all our marketing communications in accordance with Regulatory Requirements (such as "please enjoy responsibly", and appropriate drink aware labels relevant to the particular market).
- V. We clearly represent the ABV (alcohol by volume) of our products on all labelling and packaging.

- VI. Marketing communications must not present abstinence or moderate alcohol consumption negatively, even in a humorous manner. We acknowledge that people have a variety of reasons not to consume alcohol, including cultural and religious reasons, and we fully respect every individual's right to choose - an individual's choice whether or not to drink must always be encouraged and respected. As part of our commitment to the responsible consumption of alcohol we produce and distribute a range of no and low-alcohol variants of our Brands.
- VII. Our marketing will not contain anything which is likely to lead consumers to adopt styles of drinking deemed unwise.
- VIII. We will take the utmost care in our marketing not to exploit anyone under the LPA, or persons who are mentally or socially vulnerable.
- IX. We will not portray drinking alcohol as a challenge. Our marketing communications shall not show, imply, encourage or refer to aggression or unruly, irresponsible or anti-social behaviour nor link alcohol with brave, tough or daring people or behaviour.
- X. Our marketing communications must not condone, reference or suggest the buying of repeat rounds of alcoholic drinks, nor imply that the success of a social occasion depends on the presence or consumption of alcohol.
- XI. Our marketing communications will not promote drinking games that have high speed incentives or that require the consumption of undue quantities of alcohol.
- XII. We will not advertise or promote our alcohol Brands in a way which suggests that consuming alcohol will boost stamina or prolong the drinking session.
- XIII. Our marketing communications will not portray or suggest any association with violence and will not glamorize or incite hatred or violence in any way.
- XIV. Before associating any of our Brands with gambling in any of our marketing communications, we will assess the nature of any local sensitivities towards gambling in the relevant location.

4) Good Taste

- I. All marketing must reflect generally accepted standards of good taste and common decency.
- II. When developing our marketing communications, we must be mindful of, not only our target audience, but also members of broader society in the relevant location.
- III. Our marketing must always be respectful of race, religion, ethnicity, nationality, sexual orientation, gender and all other personal identifiers.
- IV. Our marketing activities must always be respectful of, and sensitive to, diversity and whenever possible, we will aim to actively promote diversity and inclusion and avoid inappropriate stereotypes.

5) Adult Appeal

- I. We only advertise and market our alcohol Brands, and low/no alcohol variants, to people above the LPA and/or otherwise in accordance with applicable Regulatory Requirements in the relevant location.
- II. Our marketing will only be placed in traditional or on any form of digital media in accordance with the applicable Regulatory Requirements on placements in the relevant jurisdiction (including requirements relating to the applicable adult audience profile).
- III. We will not use any imagery, styles, behaviours, music, characters (real or fictitious), cartoon characters, athletes, celebrities or influencers, games or gaming equipment that appeal primarily to people below the LPA and which might encourage people under the LPA to drink.
- IV. Compensated actors and people appearing in prominent roles or depicted in our Brand advertising must be, and appear to be, over 25 years of age in accordance with the rules of the relevant jurisdiction.
- V. Our marketing communications must not show adolescent or juvenile behaviour.

- VI. We will take reasonable steps to ensure that outdoor advertising of alcoholic products is not in close proximity to schools, except within licensed premises. We will comply with all local Regulatory Requirements relating to the distance of alcohol advertising from places such as schools, childcare facilities, or public playgrounds.

6) Health Claims

- I. Our marketing communications do not make any positive health, dietary or performance claims about alcohol. Where any nutrition claims are permitted in accordance with Regulatory Requirements, our marketing communications shall always comply with the applicable restrictions and guidance.
- II. Our marketing communications do not imply that drinking alcohol enhances mental ability, popularity, attractiveness, performance, personal qualities, skills or strength.
- III. Our marketing communications do not suggest that alcohol might be indispensable or take priority in life, or that drinking alcohol can overcome boredom, loneliness or other health or social problems. Our marketing will not suggest that alcohol has any therapeutic qualities or that it is a source of nourishment.
- IV. We do not market our alcohol Brands to pregnant women and do not portray pregnant women in any of our alcohol Brands marketing communications.
- V. We must display calorie information and the Chief Medical Officer guidelines on the primary packaging of our major Brands in the UK and Ireland.

7) Effects and Safety

- I. We only suggest drinking alcohol in safe and appropriate circumstances.
- II. Our marketing communications must never suggest that drinking alcohol is necessary to obtain personal or sexual success or social acceptance. We shall not link alcohol with seduction or sexual activity, though we may portray our Brands as part of a social or romantic setting.
- III. We never associate our alcohol Brands with drinking before, or when, driving motor vehicles, operating machinery, or any other unsafe situations, activities or locations.
- IV. Our marketing communications must never link alcohol to illicit substances.
- V. Our marketing communications must never feature alcohol being handled or served irresponsibly, including regular solitary drinking, the buying of a large round of drinks, or drinking games or pub crawls.

8) Alcohol alternatives and low-alcohol drinks

Alcohol alternatives products are those at or under 0.5% ABV, which is typically in line with how the alcohol alternatives market broadly describes their 'alcohol free' products (also referred to below as "non-alcoholic" or "non-alcohol"). By contrast, "low" alcohol drinks contain between 0.5% and 1.2% ABV.

- I. Our marketing communications for alcohol alternatives and low alcohol drinks with ABVs above 0% must include a prominent statement of the relevant ABV.
- II. If a marketing communication for an alcohol alternative also refers to, or otherwise has the effect of promoting, an alcoholic drink, the rules set out in this RMC relating to alcoholic drinks apply in full.
- III. We only promote non-alcoholic Brands to adults above the LPA.
- IV. We clearly differentiate non-alcoholic variants of our Brands from those containing alcohol, via packaging, labelling and marketing communications.

- V. We may, in our marketing communications, present low or non-alcohol drinks as preferable due to their reduced strength, provided that we clearly state that alcohol content in the relevant communication.
- VI. We may present non-alcoholic drinks (i.e. drinks with an ABV at or below 0.5%) as a responsible choice for designated drivers and/or pregnant women, taking into account local laws and conditions. In such circumstances, our marketing communications will include a clear and prominent statement that the product is "alcohol free" (or similar, with ABV where relevant), and/or statements such as "if you don't want to drink alcohol..." or "for those not drinking...".
- VII. Our marketing communications in relation to alcohol alternatives shall not encourage drinking when it is not already considered to be appropriate (e.g., early morning, during the working day, during sporting activities or in schools or childcare situations).

"Alcohol free"

In terms of the official guidance, the descriptor 'alcohol free' should only be used on drinks from which the alcohol has been extracted if it contains no more than 0.05% ABV. Where a product has had the alcohol extracted but it remains above 0.05% ABV but at or below 0.5% ABV, the descriptor would be 'de-alcoholised'.

C&C shall at all times in its marketing, take care not to mislead consumers by implying that a product contains no alcohol at all if it contains any. For some consumers, whether for health, religious, or other reasons, the presence of a small amount of alcohol may be material information.

9) Digital Media

- I. We apply the same minimum standards of the RMC to all of our marketing communications, including those on social media.
- II. We use age affirmation controls for all our Brand websites and apps.
- III. All digital marketing communications, paid or unpaid and where the content of those communications is under our control, must adhere to all Pillars of the RMC and all Regulatory Requirements.
- IV. We will not place marketing communications in media primarily intended for children or in media that have an adult audience profile which is less than that required under applicable local codes and laws.
- V. We monitor all our social media channels to ensure any content does not encourage or promote dangerous or illegal activities.
- VI. All paid digital marketing communications will target audience minimum of 75% LPA.

10) Product Placements and Brand Sponsorships

- I. This section of the RMC applies to placement, sponsorship or promotion agreements we have, including any material carrying company or brand logos.
- II. We only sponsor or promote activities or promotional events where the audience and/or participants are older than the LPA, in accordance with local codes and laws; and our marketing communications shall not include anyone unless they are, and appear to be, over the age of 25 years old and/or otherwise in accordance with the applicable local codes and laws.
- III. We will not allow the placement of our Brand names, logos, or trademarks on merchandise which has a particular appeal to / intended for use primarily by people under the LPA.

- IV. We will not sponsor individuals, groups or events associated with sexual activity or sexual success.
- V. Any marketing materials, merchandise, displays or sponsorship items will comply with all other relevant provisions of the Code.

11) Competitions and Consumer Promotions

Marketing communications that include a promotion and/or competition must not imply, condone or encourage excessive consumption of alcohol.

When it comes to consumer promotions with a multiple purchase mechanic, C&C shall ensure that the number of items that need to be bought does not encourage consumers to exceed Department of Health (or other regulatory) guidelines for safe drinking and we shall keep up to date with these applicable guidelines. We will also ensure that the duration of any such promotions is long enough to allow consumers to participate without drinking excessively or irresponsibly.

We will not, in our marketing, give any impression that a consumer's chances of winning a promotion prize is increased by consuming multiple drinks.

C&C shall ensure that it complies with all applicable Regulatory Requirements which are relevant to consumer competitions and promotions.

12) Sustainability and the Environment

C&C is committed to doing its part in protecting the environment and improving the sustainability of our Brands. We acknowledge the need for our employees to be aware of the importance of ensuring that any statements or claims relating to the environmental credentials of our products, are not inaccurate or misleading. We are therefore requiring all marketing, communications and legal colleagues to undertake online training produced by the ASA on climate change and the environment.

13) Naming, Packaging and Promotion of Products

- I. We will clearly communicate the alcoholic nature of a drink on the relevant packaging.
- II. We will not on any drink packaging or promotional materials unduly emphasise any higher alcoholic strength or intoxicating effect of the relevant product.
- III. We will not in any of our marketing communications or packaging urge consumers to drink rapidly or to "down" a product in one.
- IV. We shall strive to ensure that our Brand and product names do not cause serious offence.
- V. We will comply with all Regulatory Requirements relating to the naming, packaging and promotion of our Brands in each relevant location.

14) Research

- I. Consumers in any research which we undertake will never be encouraged or compelled to drink excessive amounts of alcohol. If we observe such behaviour, the relevant consumer(s) will either be excluded from our research, or the relevant part of the research will be stopped.
- II. We will provide anyone who takes part in our research activities with appropriate sources of information, guidance and advice in relation to responsible drinking.

- III. We will ensure that consumers who take part in our research will be over the LPA in the relevant location.
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Additional Guidance

If you would like to discuss any element of this RMC with us, please contact us at:

Consumer.Relations@candcgroup.ie.

For additional guidance on the UK rules applicable to the advertising of alcohol products, please consult the [Advertising Standards Authority website](#), or the [Portman Group website](#).

For additional guidance on Irish rules applicable to the advertising of alcohol products, please consult the [Advertising Standards Authority for Ireland website](#), the [Competition and Consumer Protection Commission website](#), or the [Coimisiún na Meán website](#).

Speak Up

If there are any concerns about the Group's compliance with the RMC (whether you are a C&C employee, officer or a consumer), we encourage individuals to speak up. This can be done via Vault which is a simple, safe and confidential app and online platform that allows individuals to raise any concerns they may have. Vault is completely confidential and run by an independent company for the Group.

Report via the Vault App: Download the app. a. Apple App Store:

<https://apps.apple.com/us/app/vault-platform/id1444463273> b.

Google:https://play.google.com/store/apps/details?id=com.vaultplatform.app&hl=en_US

Report via the Vault Online Platform



Or, if you would rather speak to us directly, we would love to hear from you. Please contact us with any concerns, complaints or feedback on our marketing activities at:

Consumer.Relations@candcgroup.ie.

C&C employees and colleagues can also (and are encouraged to) raise any concerns and/or feedback directly with their line managers.

You can also lodge complaints or concerns with the relevant regulators by clicking on the links below:

- UK:**
- (1) [ASA](#)
 - (2) [Portman Group](#)
- Ireland:**
- (1) [ASAI](#)
 - (2) [CCPC](#)
 - (3) [BAI/CNM](#)
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Support

For advice and support in relation to your own (or someone you know) drinking habits, please visit <https://www.drinkaware.co.uk/> in the UK, or <https://www.drinkaware.ie/> in Ireland, or otherwise reach out to a health professional in your area.