Pernod Ricard
Responsible Marketing Panel

Code for Commercial Communications

January 2020

This Code for Commercial Communications is designed to enable our teams and their marketing agencies around the world to be creative while meeting the **highest standards of responsible marketing.**

Menu

Alexandre Ricard
Chairman and
Chief Executive Officer

At Pernod Ricard, we are proud of our brands. Our communications around the world employ a high level of creativity. We also know that abuse or misuse of alcohol can lead to individual and societal issues such as excessive drinking, drinking and driving, or drinking by minors. We therefore believe it is our responsibility to apply high standards to the content and placement of our commercial communications, including the fast-evolving digital media.

Preamble

The content of our commercial communications is of critical importance for our **reputation** and our **legitimacy** as a responsible stakeholder in the alcohol industry.

PERNOD RICARD has adopted this **set of rules** as its own internal Code for Commercial Communications which will **apply to all its advertising and marketing around the world.**

Everyone involved in marketing or sales of our brands in PERNOD RICARD employees must comply with this Code for Commercial Communications and ensure that our advertising is also compliant with relevant national laws or codes which must be upheld,

In case of conflicts, the relevant national codes must be followed.

Commercial Communications include:

- ATL
- Internet: websites, social media (campaign concept but no single posts),
- Collaboration
- Sponsorship
- Packaging
- Innovation
- Promotion (BTL)

No-alcohol and lower-alcohol alcoholic brand extensions are not an exception to the Code for Commercial communications and must comply with the provisions regarding not having primary appeal to minors.

Agency partners, and any ambassadors or influencers, must be duly informed and/or trained on these standards as well.

For any advice, guidance or implementation of this Code as well as submissions of campaigns for approval, please contact the Responsible Marketing Panel (RMP) at **RMP@pernod-ricard.com**.

Commercial communications

Commercial communications to be submitted to the RMP

All brand advertising or marketing communications to consumers that:
• enhance customer awareness of a product/ brand;
• showcase an innovation or new product/brand.

Regardless of the medium used e.g. :
- print,
- broadcast,
- social media,
- packaging/labeling
- internet,
- sponsorship,
- consumer and trade promotion,
- merchandising,
- sampling
- point of sale material.

The Code applies to all commercial communications **over which Pernod Ricard teams have full editorial control from beginning to end.**
They also include innovations such as :
- **products entirely new to market,**
- **innovations with a significant change in labeling, packaging or flavor,**

Basic principles

Commercial Communications should:

- **be legal (obviously), of good taste and truthful** and conform to accepted principles of fair competition and good business practices;
- be prepared with a **due sense of social responsibility** and be based on principles of fairness and good faith;
- not offend prevailing standards of decency, be unethical or use **degrading stereotypes** or situations.

CAUTION : This Code contains guidance on Commercial Communications to reach a high level of ethics but if stricter rules exist in the country of execution, they should be followed.

PERNOD RICARD should not:
- **Produce any alcoholic beverage product that contains excessive amounts of added stimulants (1).**
- **Market any alcoholic beverage product or promote any beverage alcohol combination as delivering energizing or stimulating effects (e.g. spirits mixed with an energy drink).**

(1) e.g more than 200 mg/l of caffeine based on a consensus of research and regulatory information, as outlined in the report Stimulants Added to Alcohol Beverages: Research Review and Discussion.

RMP Approval Process

1

Assets to be sent by **Marketing teams**

Ask for Advice*

Submission to the Responsible Marketing Panel

RMP@pernod-ricard.com

Formal Compliance submission*

7 working DAYS

2

Confidential deliberations of the RMP

Monthly report of the campaigns submitted to the **COMEX ;**
Ask for advice submissions remain confidential.

Annual external **audit**

RED ASSESMENT: Rejected = must be **re-submitted**

AMBER ASSESMENT: **Approved** subject to **modifications**

GREEN ASSESMENT: **Approved** with **NO restrictions**

***Ask for Advice:** for a new concept, for a project which is not final and will be resubmitted for final approval.*
***Formal Compliance Submission :** for the final project or can also be almost final/mock up that does not omit any relevant creative elements.*

Inappropriate & prohibited contents

Beyond the golden rules the following are not permitted in any of our commercial communications

Inappropriate content including Physical POS / Promotional items :

- Religious themes and religion,
- Products associated with the use of codes, terms, symbols or words associated with youth culture,
- Products that lead to consumer confusion with non-alcoholic beverages,
- Sweets or children's confectionary: no confectionary/treats that are primarily associated with children. Adult confectionary is acceptable, liqueur chocolates, dark chocolate, if in doubt sales data should be looked at to ensure adult audience,
- Drinking games and/or games that can encourage irresponsible consumption,
- Games with a sexual content or connotation,
- Clothes in children's sizes or any reference thereto,
- Sex toys,
- Branded condoms,
- Hangover cures,
- Arms (gun, baseball bat, knife, etc.)

Prohibited promotional items and/or operations :

- People below the legal drinking age cannot participate in point of sales promotion. In case of doubt, ask for proof of age, when appropriate (be aware of national laws and regulations regarding identity / proof of age requests).
- Do not exercise any pressure on people willing to participate and/or act negatively towards people who are not interested in the promotion.
- Do not use any "drinking games" that may encourage excessive or irresponsible consumption, such as activities which involve price/timing or "speed incentives" (drinking an excessive amount of alcohol beverages within a short period of time).
- Do not serve consumers who are or appear to be uncontrollably excited, drunk, aggressive or engaging in anti-social behavior. Ensure your staff is fully briefed on how to manage consumers who appear drunk, aggressive or anti-social.
- Do not use drink-delivery methods / gimmicks which might confuse or mislead the consumer as to the amount of alcohol they are consuming (e.g. alcohol sprays. vaporizers).
- Do not initiate promotions with energy drinks and do not impulse them.

Golden Rules

for responsible communications

- ALCOHOL MISUSE
- UNDERAGE CONSUMPTION
- DRINKING & DRIVING
- AT-RISK ACTIVITIES
- HEALTH ASPECTS
- PREGNANCY
- ALCOHOL CONTENT
- PERFORMANCE & SOCIAL SUCCESS
- SEXUAL SUCCESS
- SPONSORSHIP

ALCOHOL MISUSE

DO

Include a responsible drinking message (RDM) in all print, TV, cinema, website, or sponsorship and digital advertisements. The RDM must be clearly legible and noticeable on the advertisement.

Unless it is technically not feasible the RDM shall be:
- prominent, horizontal and affixed in a clearly visible place
- in a font and/or color which clearly contrasts with the background
- of a height of letters equal to 1/100 of the overall sum of height and width of the advertisement if no stricter minimum size is required by the industry or any local law or regulation. If the RDM consists of or includes a logo, it should be of an appropriate size to ensure legibility.

The RDM should be expressed in the language most easily understood by the target audience and adapted to local situations.
All print local advertisements and POS materials must, unless there are other local requirements, include the website address of the local responsible drinking website where consumers can get more information e.g. www.drinkaware.co.uk, www.responsibledrinking.eu, www.distilledspirits.org/moderation-responsibility, www.disfrutadeunconsumoresponsable.com or www.wineinmoderation.eu, etc.

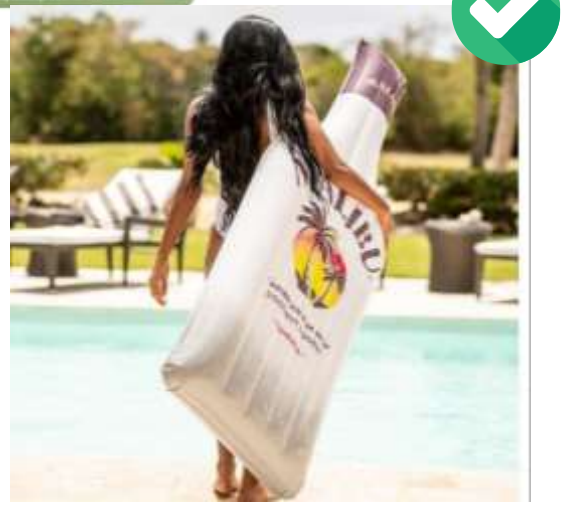
ALCOHOL MISUSE

DON'T

Commercial Communications should not :

- encourage or condone excessive or irresponsible consumption, nor present abstinence or moderation in any negative way.
- show people who appear to be drunk or in any way imply that drunkenness is acceptable.
- suggest any association with violent, aggressive, illegal, dangerous or antisocial behavior.
- be associated with, accepting of, or allude to illicit drugs.

UNDERAGE CONSUMPTION



DO

- Paid (and unpaid) Commercial Communications should only promote alcohol when at least 70% of the audience are above LPA/LDA (1) (e.g., print, broadcast, digital, events). When available, Commercial Communications must comply with higher standards.
- Commercial Communications should only use models, influencers and actors who are at least **25 years of age,** when we use them to promote a brand.

(1) For this code, the Legal Purchase Age (LPA) or Legal Drinking Age (LDA) is the minimum age to buy or drink alcohol in the relevant local jurisdiction. Should no local LPA/LDA exist, or should a breakdown of the respective local LPA not be available; 18 years of age should be used.

UNDERAGE CONSUMPTION

Personal project – for internal use only

MORE EXAMPLES

DON'T

- Commercial Communications should not be of primary appeal to minors, nor show minors consuming alcoholic beverages (nor feature a child or a teenager in a prominent shot).
- Except for CSR campaigns, no images, including any User Generated Content, of anyone who is or appears to be below LPA/LDA and involved in drinking alcohol may be shown on any website (or part thereof) within Pernod Ricard's control.
- Commercial Communications should not use creative features, objects, images, styles, symbols, colors, music and characters (either real or fictitious, including cartoon figures or celebrities such as sports heroes) of primary appeal to children or underage.
- Commercial Communications should not use brand of primary appeal to minors identification such as names, logos, games, game equipment.
- Scenes showing inflatables [e.g. doughnuts, inflatable beds/pillows, chairs, etc.] intended for use in pools or water should not be of primary appeal to minors.

UNDERAGE CONSUMPTION

Examples of unacceptable advertising

DON'T

1. Due to abuse of bright colors, bold, colorful typography and the heart-shaped logo, this label is too suggestive of non-adult graphic culture.

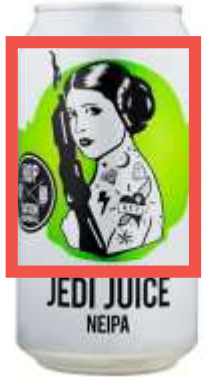
2. The name "Loopy" is similar to a cereal brand popular with kids in the U.S.

3./4. These items all carry imagery which could appeal to minors.

1

2

3



4

DRINKING AND DRIVING

Pernod Ricard believes any association of our brands with motor sports must be managed carefully.

DO

- Only depict drinking alcohol beverages after an event involving motor vehicles (including motor sports).

DON'T

- Commercial Communications should not suggest that the consumption of alcoholic beverages is acceptable before or while driving motor vehicles or motorised equipment of any kind, including - but not limited to - speed boats, jet-skis, snow-mobiles or airplanes, etc.

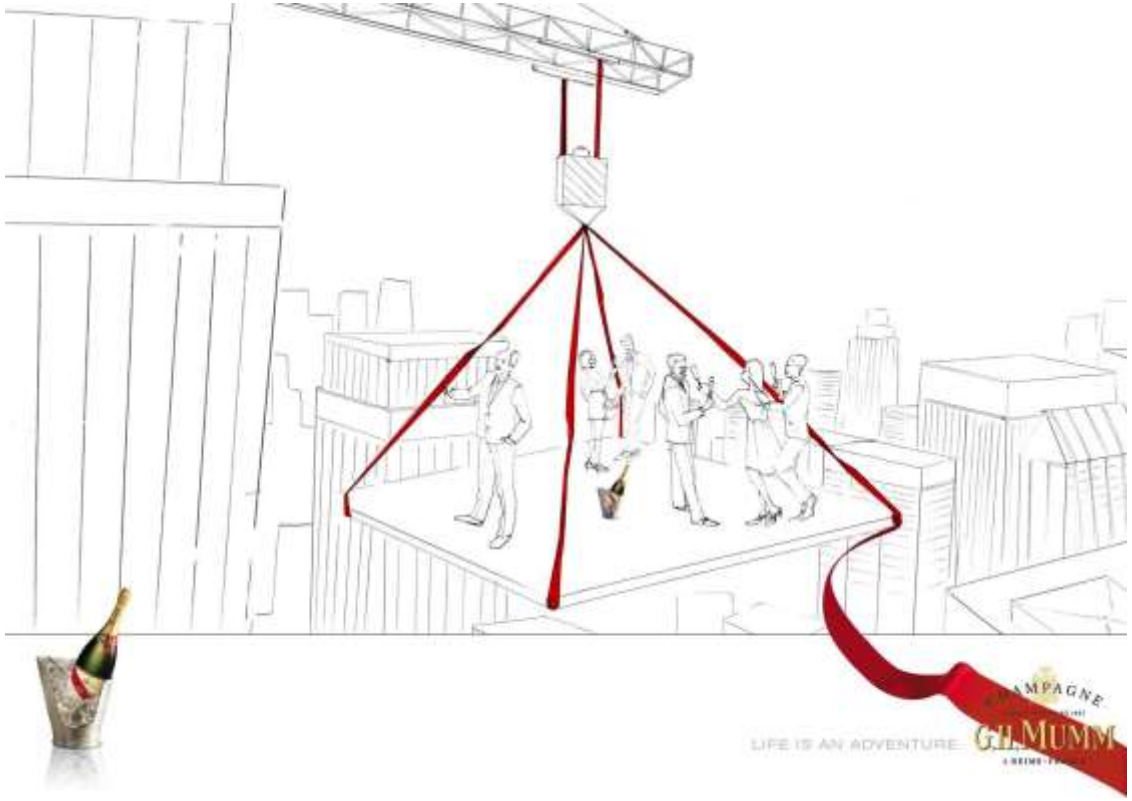
HAZARDOUS ACTIVITIES, WORKPLACE & RECREATION

DO

- It is fine to show adults enjoying a drink after playing sports or in the work place or after recreational activity, provided it is clear the activity has ceased and will not start again.

The polo players drink after the match.
The people drinking during the match are spectators and are doing so moderately.

HAZARDOUS ACTIVITIES, WORKPLACE & RECREATION



DON'T

- Commercial Communications should not suggest that the consumption of alcoholic beverages is acceptable before or while operating potentially dangerous machinery, or with undertaking any potentially hazardous recreational or work-related activity.

Rooftop are clearly scenes were there might be danger and should be used with precaution

HEALTH ASPECTS

DO

- Commercial Communications using truthful and accurate factual statements about carbohydrate, calories or other nutrient content may be appropriate in some circumstances and where permitted by law.

This is an ad for the first new Ricard product since the creation of the brand, highlighting the use of fresh plants. The paper reads : "A new recipe made with anise extracted from fresh plants cultivated locally in Haute-Provence".

DON'T

- Commercial Communications should not claim or imply that alcohol beverages may have therapeutic properties or that consumption may help prevent, treat or cure any human disease or illness.

Disassociating any kind of alcohol from potential health benefits in advertising was one of the first ethical commitments made by the industry.

PREGNANCY

DO

- All Pernod Ricard bottles shall include the pregnancy logo unless otherwise prescribed by local laws.

DON'T

- Commercial Communications should not show a pregnant woman drinking or be aimed at encouraging pregnant women to drink.

The ad reads : "Beer is nourishing. She drinks it. She does not." This type of advertising targeting young mothers by promoting the healthy characteristics of alcohol is totally forbidden.

ALCOHOL CONTENT

DO

- Commercial Communications may present information for consumers on alcoholic content.

« 51 Swimming Pool : Pastis Differently »
Served in a Pool Glass with 7 parts of water and a handful of icecubes »

DON'T

- Commercial Communications should not create any confusion as to the nature or content of alcoholic beverages.
- Messages may not imply or state that consuming alcoholic beverages or low alcohol is healthy or has no effects.
- Commercial communications should not emphasize or glorify alcoholic strength

The Facebook post said, "NITRO ZERO SUGAR = ZERO REGRETS", and promoted the drink as the "strongest energy RTD formulation", "pumped with Guarana so you may not get that much sleep... A complaint was released.

PERFORMANCE AND SOCIAL SUCCESS

DO

- Commercial Communications may suggest that drinking alcohol is part of an acceptable well balanced lifestyle.
- Success can be showcased.

DON'T

- Commercial Communications should not create the impression that the consumption of alcoholic beverages enhances mental ability or physical performance or has an energizing effect.
- Commercial Communications should not suggest that the consumption of alcoholic beverages is a requirement for social acceptance or success nor lead to social success.

The tagline « everyone plays but you win » might imply that drinking Ballantine's will make you win and is thus socially successful.

SEXUAL SUCCESS

1

2

DON'T

- Under no circumstances should Commercial Communications offend generally prevailing standards of taste and decency.
- Commercial Communications should not suggest that the consumption of alcohol beverages enhances sexual capabilities, attractiveness or leads to sexual success.
- Commercial Communications should not degrade the image, form, or status of women, men, or of any ethnic, minority, sexually-oriented, religious, or other group.

1. The images in the advertisement are not consistent with generally accepted standards of good taste: the female models are either partially clad or nude, playing a game of strip poker in which the male model is fully clad in a rabbit costume with a lascivious facial expression.

2. This ad equates vodka with an objectification of women and a sexual act.

SPONSORSHIP

PERNOD RICARD treats sponsorship with the same due diligence and great respect for maintenance of the high standards of responsibility that they apply to all other marketing disciplines.

Sponsorship means any commercial agreement by which a sponsor, for the mutual benefit of the sponsor and sponsored party, contractually provides financing or other support in order to establish an association between the sponsor's brands or products and a sponsorship property in return for rights to promote this association and/or for the granting of certain agreed direct or indirect benefits.

This rule applies to the overall sponsorship agreement, including any sponsored event material carrying the sponsor's logo or trademark for the duration of the sponsorship agreement. However it does not concern partnerships with artists (films makers, painters, musicians…) where there is no brand communications in their artwork.

DO

- Sponsorship for programs that encourage social responsibility or discourage underage drinking is permitted.
- Sponsorship may be accompanied by an activity or message promoting responsible drinking behavior.
- An adult oriented cultural or sports event meeting the 70% threshold (e.g., city orchestra or opera) may be sponsored even if it should turn out that a small number of the performers are under LPA/LDA. It is the sponsor's responsibility to demonstrate that this requirement has been met.

SPONSORSHIP

DON'T

- Branded merchandise associated with a sponsorship should not be aimed at people under legal purchase age or have a primary appeal to them.
- No sponsorship of junior sports teams, junior sports leagues or junior cultural events, such as musical/talent contests or awards primarily for people under LPA/LDA.
- Sponsorship must not suggest that players/performers consume alcohol before or while performing, or that alcohol consumption enhances performance in any way.

This picture was posted on social media as part of an influencer strategy, without being checked by any marketing team. We immediatly asked for it to be taken down.

F.A.Q.

Is it possible to make a sponsorship of a football (soccer) team or league?

The PR Code does not prohibit sponsorship of football (and, indeed, many sports) as long as there is no association in the related marketing activity between the consumption of alcohol and the practice or performance of the sport. Marketing departments must also ensure that the audience for the sport and its release (e.g. TV audience) meets the 70/30 adult threshold.

Is boxing allowed in the scope of the Code?

Our brands should by all means avoid any association with violence and in some countries (e.g. Ireland), the sponsorship of boxing by alcoholic beverages is forbidden. Local legal check is mandatory

Does PR Code excludes nudity from commercial communications

Any use of an image of a nude man or a woman must be in good taste and appropriate for the brand message being conveyed. Commercial Communications should avoid the use of graphic, lewd or gratuitous nudity

Featuring arms in PR commercial communications is admissible ?

In principle our brands should not be associated with firearms but in some cases, if it is the heritage of the brand which was being promoted and not the pistols themselves, it would be acceptable

Is product placement in the scope of the Code?

Product placement guidelines will be available soon

Are point of sale marketing initiatives open to everyone?

Minors must not have access to our sales marketing initiatives and people exhibiting anti-social behavior are not allowed to be included in our promotions

Is it strictly forbidden to feature cars in our Commercial Communications ?

Appendix

- Age of Models
- Influencers
- Digital Safeguards
- Communication vehicles

Age of models in our commercial communications

Paid Models and Actors
Paid models used in marketing activations should be at least 25 years old. This applies to all media; If they don't look 25, the Responsible Marketing Panel will ask for proof of age (ID check).

Be aware of national regulations regarding the age of models. For instance:
- The UK self-regulatory Code states that models should be and appear to be at least 25 years old;
- In the US, the DISCUS Code states that alcoholic beverages should not be advertised or promoted by any person who is or appears to be below the legal purchase age; models and actors should therefore be at least 25 years old and should reasonably appear to be over 21 years of age.

Influencers
Influencers must be at least 25 years old and have an audience of at least 70% of people above the LPA.

Influencers must always mention in their videos/blogs if they are sponsored or if it is an advertisement (meaning some control of the editorial content) and content must not be appealing to underage people.

Celebrities
The "25 years or older" age rule applies to celebrities if they are paid to appear in our commercial communications.

Interpretations - Exceptions

Brand representatives (employees, brand ambassadors, bartenders, promoters, etc.) are not considered to be "models" or "actors" within the meaning of the Pernod Ricard Code and therefore the "25 years" rule does not apply, unless local Code contains stricter provision. They must, however, be at least of the legal drinking/purchase age of the country.

A group of celebrities (e.g. musicians, sports team) with members below 25 years old can be used in an advertisement or promotion, with 4 conditions :
- there must be no single depiction of someone who is less than 25 years old,
- there must be no drinking pictures,
- there must be no activation on personal social media
- and the majority members must be over 25.

Charity purposes
Underage people can be seen in promotional material for charity as long as they are not "paid models or actors", are not shown drinking alcohol or branded products.

Working with Responsible Influencers

1/2

"Influencer" or "endorser" refers to any individual with an audience (typically social media) whom we recruit to promote our brand(s).
Influencers can range from well-known celebrities to bloggers and social media personalities, and they often receive payment, free products, or other incentives to promote brands with their "followers."

DO

All Influencers must meet the following criteria:

- Be at least 25 years old and reasonably appear to be LDA/LPA or older
- At least 70% of their followers must be LDA/LPA (based on reliable, up-to-date information, e.g., Facebook audience demographics)
- No known history of serious alcohol-related offenses, substance abuse, or irresponsible behaviour e.g., excessive consumption, offensive conduct, violence.

DON'T

All Influencer contents must not:

- Depict or endorse irresponsible drinking behavior (e.g., drinking and driving, excessive consumption, underage drinking, or engaging in dangerous activities),
- Appeal primarily to individuals under LDA/LPA or use imagery that primarily appeals to children (e.g., toys, cartoons, or Santa Claus),
- Depict anyone under the age of 25 or that appears to be younger than LDA/LPA ,
- Depict or imply illegal, antisocial, violent, abusive, or dangerous behavior of any kind,
- Degrade the image, form, or status of any person or social or ethnic group,
- Make fun of individuals that abstain from drinking,
- Suggest that a drink can enhance mental or physical performance or provide curative or therapeutic benefits,
- Make claims about other brands or competitor brands unless properly substantiated,
- Disparage competitors or other brands,
- Include third party trademarks or copyright (e.g., "Sipping some #[BRAND X] for the #Oscars" or including products with recognizable third-party logos, such as a Louis Vuitton monogram bag),
- Tag or promote celebrities or public figures without consent.

Working with Responsible Influencers

2/2

Influencers shall make adequate disclosures in promotional posts whenever they have a "material connection" to our brands. A "material connection" can exist any time we provide incentives or other benefits that could impact the Influencer's credibility, including:

- Monetary Payments,
- Gifts,
- Special access privileges (e.g., festival or backstage passes),
- Travel expenses,
- Any financial incentive, relationship, gift, or other connection that could even potentially impact an Influencer's credibility must be disclosed to consumers.

TIP: Don't assume consumers know about an Influencer's brand relationships, even if a partnership is well-known

How to Disclose:

- Include disclosures in each branded post (e.g., an endorsement in one tweet followed by a disclosure in the second tweet is not enough).
- Disclosures should be immediately visible to consumers in the original post. They should not be buried in a bio, profile page, separate link, or after a "more" button.
- Disclosures should be clear, unambiguous, and accurately describe the relationship. Examples include: #ad, #sponsored, #[Brand]Employee, #paid, #[Brand]Ambassador or "I received a free product from [Brand]").
- Avoid disclosures that are vague or unclear, including: #sp, #spon, #collab, "Thanks [Brand]," #partner, or #ambassador. Tagging or mentioning a brand without disclosing the Influencer's connection to the brand is also NOT sufficient.
- Disclosures should not be hidden among multiple hashtags (e.g., "#poollife #floaties #sunshine #summerfun #pinacolada #ad #malibu #livingthedream #sundayfunday) or combined with other words (e.g., "#SippinInStyleAd").
- For visual content, both traditional and "live" (e.g., YouTube, and Instagram Stories), include appropriate text disclosures in a readable font size. Videos should include a verbal disclosure (presented at an adequate volume) at the start of the video and superimposed text disclosures.
- For image-only platforms that do not use captions (e.g., live videos), superimpose text disclosures over images/videos.

Digital Safeguards (RDM, FAN, AAP, UGC, Official verification)

1/4 **The Following digital safeguards are mandatory**

- **A responsible drinking message on all our digital assets**

All websites and other brand owned or sponsored sites (eg Facebook pages, Twitter Feeds, Apps etc) should contain a Responsible Drinking Message (RDM)

The precise text of the message may be varied but should advocate responsible drinking. The message can use the brand name but should not use the brand logo. The RDM should be horizontal, clear, legible and placed in an obvious position.

On brand websites the RDM must appear on both the AAP and the Home page. On applications it must appear on either the Welcome screen or the Home page.

All those sites should also carry a link or section directed to a simple page presenting the commitment of the brand to responsible drinking.

On Facebook pages, the RDM must be shown on the Cover photo. In addition there must be a ”Responsible Pact” tab (it does not need to be named Pact must it must clearly relate to responsibility). This tab must be one of the first four tabs and therefore immediately visible on the page,

The message can appear in two different forms. On advertisements and websites it appears as a line of copy. The letter height is subject to a specific formula (outlined below) and the text should be in a contrasting color to the background to ensure good visibility.

- **An age affirmation mechanism**

All websites operated by PERNOD RICARD, with the exception of those pertaining to corporate financial issues, must carry an age affirmation page (AAP sometimes referred to as LDA or LPA or AVP page). This is a page that carries a field that requires the consumer to enter their age of birth. It should be implemented before entry to check that this user is over LPA/LDA.

The method of age affirmation should require the visitor to actively input their date of birth including day, month and year or, where possible, similar mechanism with same effect (Example: display the year field first and only the month in case the year is in conflict with LPA/LDA, and day only in case the month is in conflict with LPA/LDA). These should not be prefilled with example dates.

- **A forward advice notice (FAN), reminding users not to share alcohol ads with anyone under the LDA**.

Any material designed for sharing or downloading irrespective of where it is placed, must carry an appropriate warning that it should not be shared with anyone under the age at which it is legally permitted to purchase or drink alcohol in the country of viewing.

This material should therefore begin with a frame that carries an age warning e.g. *“this material relates to the promotion of alcohol and should not be viewed by anyone below the legal age of alcohol purchase in the country of viewing”* (please note that whenever TV commercials are put onto sites they should carry this frame irrespective of whether it is intended that they should be downloaded).

Digital Safeguards (RDM, FAN, AAP, UGC, Official verification)

2/4

- **A user-generated content policy (UGC), which reminds users that all content they create must comply with the following rules**:
  - ✓ It must not glorify the alcohol strength, relatively high alcohol content or intoxicating effect of a drink;
  - ✓ It must not associate a drink with violent, aggressive, dangerous or anti-social behavior;
  - ✓ It must not suggest any association with, acceptance of or allusion to, illicit drugs;
  - ✓ It must not associate a drink with sexual success;
  - ✓ It must not suggest that drinking can lead to social success or popularity;
  - ✓ It must not encourage illegal, irresponsible or immoderate drinking;
  - ✓ It must not encourage "down-in-one" consumption;
  - ✓ It must not have a particular appeal to those under legal purchase age;
  - ✓ It must not suggest that a drink can enhance mental or physical performance;

When User Generated Content is automatically uploaded to PERNOD RICARD owned or controlled website (or page) then it must be reviewed before it appears or the inappropriate content removed within a business day window.

All first-time visitors to the brand site (or other location where an AAP is required) should be required to navigate an Age Affirmation Page (AAP) unless they are being referred from a website which itself is age-protected to a similarly rigorous standard. This includes traffic generated from pay per click search engines, natural search campaigns and displayed advertising campaigns.

Example of rules for UGC:

[Brand company or Market company] and all companies within the PERNOD RICARD group have a commitment to responsible drinking and discouraging misuse of our products.

We therefore hope you understand that we expect fans not to post any comments, photos, videos and other type of content ("Post") which:

- features people who are or appear to be under the legal drinking age, [25 years old for sites designed to a predominant UK audience];
- is made by someone under the legal drinking age;

Digital Safeguards (RDM, FAN, AAP, UGC, Official verification)

3/4

- encourages underage purchase or drinking of alcoholic beverages or illegal, irresponsible or immoderate drinking;
- promotes over-consumption or condemns or criticizes in any way anyone who chooses not to drink alcohol;
- portrays irresponsible drinking in a positive light or associates drinking with driving, operating any kind of machinery or engaging any kind of dangerous activity;
- implies alcohol beverages have any physical, psychological, intellectual benefits or contributes to sexual success;
- implies alcoholic beverages increases confidence or helps overcome individual or social problems;
- glorifies the alcoholic strength, relatively high alcohol content or intoxicating effect of a drink;
- mentions drinking alcohol in relation to any kind of illegal, antisocial, dangerous, aggressive or violent behavior.

Should your Post be not compliant with the points above, you understand that we will remove it.

For more information on our commitment for responsible drinking, please visit [any URL of the Group dedicated to responsible drinking and/or http://www.responsibledrinking.eu/ and/or www.discus.org/responsibility and/or local page dedicated to responsible consumption]. To provide feedback on how we can improve these efforts, do feel free to leave your comments here below!

For online sales (e-commerce), where legal, web sites should carry a simplified Age Affirmation Page on the home page to check if the visitor is above LPA/LDA in the country. Users should however enter their full date of birth before the act of purchasing.

Direct electronic communications to registered members of LPA/LDA may contain a link allowing direct entry to the site (i.e. by-passing the AAP).

AAP pages, like all website pages should carry Terms and Conditions and a Privacy policy.

All AAP pages must carry a prominent responsible drinking message and a link to a consumer information website on responsible drinking where available (in Europe this should be www.responsibledrinking.eu and in the USA http://responsibility.org/).

Only minimal reference to the brand (for example a small product shot or logo is permitted.

Corporate websites, intended to communicate company information rather than to promote a particular brand(s), do not need to feature an age affirmation page. However if there are sections within these sites dedicated solely to brands then these sections should have an AAP.

Digital Safeguards (RDM, FAN, AAP, UGC, Official verification)

4/4

In determining whether a particular third-party website is a suitable vehicle for alcohol marketing teams should refer to the following sources:

- Syndicated data source – This is generally the most reliable evidence of a website's audience profile. The most appropriate indicator is the most recent three months site average of available audience data of unique visitors (where seasonal fluctuations are evident the previous year's data should also be taken into account, if available). Companies should be aware, however, that some syndicated sources do not cover all ages (for example, some suppliers' data currently does not include individuals aged under-15). These sources should therefore be used with caution.

- Independent demographic survey - If a website is not measured by a syndicated data source, or such data does not provide convincing evidence whether the 70% threshold has been met, companies should ask the website publisher to provide an independent demographic survey of the age profile .

- "Registered user" database – If neither of the above sources are available, or these data do not clearly demonstrate whether or not the 70% threshold has been met, but the website publisher operates a "registered user" database incorporating an age confirmation element, companies should use this as evidence of the likely age profile of overall visitors.

If a site does not meet the 70% threshold but operates a registered user database and has the ability to target users demographically with advertisements based on the date of birth they gave when registering, a marketing team may place an advertisement as long as it is seen only by registered users of LPA/LDA.

In the event that none of the above is available, for example because it is a non-permanent (e.g. event-specific) website, may be placed marketing content only if (1) either the website is age-protected to at least a similar standard as that expected of alcohol brand websites or (2) the website is unquestionably targeting an adult audience and runs no risk of attracting a significant proportion of under LPA/LDA visitors following a review of:

- the (proposed) content of the website;
- comparable web sites;
- data provided by the publisher regarding the target audience;
- any other relevant factor.

Detailed guidelines for some specific communication vehicles

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Applications (eg IPhone, Android etc)

Where there is an age requirement included in the service (e.g ITunes has a 17YO + option) the application must only be available to 21YO+ or closest to that. If there is no age requirement specified by the service or it is below 21YO+ then there must be an additional notice stating that the application should only be downloaded by those aged 21 years or over.

Where access to an application is limited to a specific country then the age requirement may be the higher of LPA or 18 years.

If the service can prevent users who do not meet the age criteria from downloading the application then this should be enacted.

Applications must have an age affirmation in the app itself that shows the first time it is used. It does not need to be repeated each time the app is used.

Applications must have a responsible drinking message visible on the Welcome screen or the Home Screen (ideally with a link to responsible drinking content in your region or country as applicable). Detailed requirements can be found in Appendix 1F.

Blogs

All Pernod Ricard blogs should be located on a site/platform that has an AAP.

Pernod Ricard or its agents should only make comments on blogs where there is a reasonable expectation that at least 70% of the audience is aged over LPA/LDA.

All Pernod Ricard blogs should carry a Responsible Drinking Message within the blog introduction.

Detailed guidelines for some specific communication vehicles

BlueTooth and similar near field technologies

BlueTooth messaging or similar near fields technologies should link directly to an AAP unless it is being only used in areas where the audience is restricted to those of legal drinking age (e.g. Private events, Clubs and bars).

Instant Messaging

Pernod Ricard and its agents may only Instant message recipients who are registered users of a specific club or group (eg Glenlivet guardians) and have already affirmed their age as a part of that registration and consented to receiving such communications.

Advertising on Mobile devices

Third party mobile sites which are used for advertising must meet the 70% rule. Marketing material (e.g. sweepstakes) which is accessed via a mobile phone must carry an age affirmation page.

Direct messaging to mobile devices may only be undertaken to recipients who have confirmed that they are over the legal age of alcohol purchase (for example they may be part of a registered club) and consented to receiving such communications. Phone (device) registration data alone is not considered acceptable as in many cases a minor's phone is registered to their parent.

Gaming

Advertising within third party games can only be run if the audience to the game can reasonably be shown to be within the 70% rule or sales of the game are restricted to over LPA/LDA. If you are intending to undertake this type of activity please speak to Responsible Marketing Panel members.
"Advergames" are permissible but the distribution of these games must be through websites that have AAP's and they must also contain a warning that they are intended only for those of LPA or above.

Detailed guidelines for some specific communication vehicles

Podcasts

Podcasts should carry a download advice notice and only be located on sites which have an age affirmation page.

QR Codes

Quick response codes are two dimensional bar codes that when scanned or photographed link to a particular website.
Unless they are situated in age restricted areas (eg clubs or bars) or are accessed via an age affirmed website, wherever possible a QR code should link to material which carries an age affirmation page. QR codes should be accompanied by a notification that the content is intended for those over LPA only.

POS/Event based digital experiences

Should have age affirmation page unless they are in an area that is restricted to LPA (eg Clubs or bars) or controlled by a person over LDA. If controlled by a person they must ensure that anyone using the system is over the legal drinking age.

Relationship Marketing

Relationship marketing can only be undertaken by registered users who in registering have affirmed that they are over LPA/LDA.

RSS Feeds

Really Simple Syndication feeds allow content to be taken into the users' aggregator (or reader). The link back to the content requires that the user goes through the original site's Age Affirmation Page (although the site may utilize "a remember me" feature).

Search Engine Marketing & optimization

Search Engine links (eg Keywords) must direct users to the age affirmation page of the appropriate website.

Detailed guidelines for some specific communication vehicles (twitter, facebook, other social media)

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Wiki's (eg Wikipedia, PBwiki)

PERNOD RICARD should only participate in Wiki's which meet the 70% rule.

Twitter

Advertising on Twitter is subject to the 70% rule.
Branded Twitter Feeds should be age gated. This is possible using Twitter Age Gate system (more info here: https://support.twitter.com/articles/20169945)

Branded Twitter feeds should carry a responsible drinking message within their introductions. This should be in the same font, color and size as the rest of the introductory text.

Twitter Feeds must contain a notice on their home page saying that the content is only intended for viewing by those over the legal age of purchase or drink in their country of residence or viewing (whichever is older).

Facebook

Facebook pages should be set up to only be available to anyone over legal age of purchase or drink. This can be achieved by selecting the "Alcohol Related" Age restriction in the Facebook page administration panel under the "Manage permissions" category. The page must also be categorized in the "Wine/Spirits" category. Additionally they should have a message on the page outlining that this page should not be read or accessed by anyone under legal purchase age. (Technically this should not be necessary as the page will only be visible to Facebook users over the appropriate age; however the message will make it clear to regulators that we are taking a responsible attitude to underage drinking).

Detailed guidelines for some specific communication vehicles (Instagram, pinterest)

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Instagram

Official branded Instagram channels must use the age gate mechanism put in place in April 2015. The enablement of this age gate can be done via our Facebook representatives (detailed presentation available on Chatter or via our CSR Leader). Any linking from an Instagram account should be to a location that is age gated for alcohol-related content. Additionally branded Instagram pages should contain both a responsibility message and a note that material is intended for people over legal drinking age.

Pinterest

Branded Pinterest channels do not require age gates but any links to alcohol related content must be age-gated. Additionally branded Pinterest pages should contain both a responsibility message and a note that material is intended for people over legal drinking age.

YouTube (Vimeo, Hulu and other video sharing sites)

All video material placed on this type of site should have an age warning at the beginning irrespective of whether or not it is intended to be downloaded. PERNOD RICARD and its agents should only upload material to sites which meet the 70% rule.
Wherever possible branded video channels should be age gated or restricted to registered viewers of legal drinking age.
Youtube Age Gating Guide:
https://support.google.com/youtube/answer/2950063?hl=en

All branded video channels should contain a responsibility message within their introduction of the same font color and size as the rest of the introductory text. (See Appendix 1F for detailed requirements)
If a part of your video is used as an advertising campaign and displayed as a teaser (meaning less than 15 seconds of viewing), you may display the RDM in a ticker field at the bottom of the screen during the 15 seconds. It means you can display your full content during 15 seconds for this advertising.