

The Asahi logo is rendered in a white, bold, sans-serif font. The letter 'A' is significantly larger than the other letters, and the 'i' has a distinctive dot. The logo is positioned in the upper left corner of the page.

Asahi

Asahi Europe & International

The background of the page is a repeating pattern of hop cones, rendered in a light blue color against a darker blue background. The pattern is dense and covers the entire page. A vertical yellow bar is located on the left side of the page.

Policy on Commercial Communication

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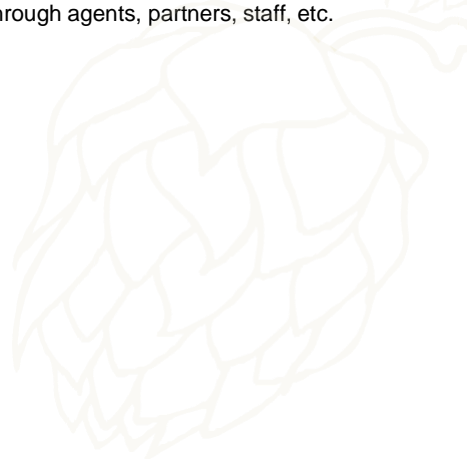
Introduction

Asahi Brands Germany GmbH believes strongly in our responsibility to be a force for good, in the communities in which we operate. An integral part of this is to communicate about and market our products in a responsible way.

Although beer and alcohol advertising is among the most widely regulated advertising in the world, we recognize that being a responsible advertiser often requires going beyond legal compliance. In addition to compliance with local laws and regulations, we require our companies to adhere to the **Policy on Commercial Communication** (the Policy), which establishes consistent standards for the marketing of our brands worldwide. We also expect our agents, partners, and anyone acting on our behalf to adhere to the Policy. To ensure our advertising respects local cultural values, we further encourage the adoption of, adherence to and

participation in brewer and other relevant self-regulatory processes and codes in the local markets where we do business.

We share this Policy with retailers, other brewing and alcohol companies that operate in our markets and regions, and any other stakeholders, to support the improvement of standards across the industry. This policy is also available at <https://www.asahideutschland.de/wichtige-dokumente>. Sales and marketing personnel are essential to help protect our license to trade, which includes the marketing and promotion of our brands. Every person holding sales or marketing responsibilities is accountable for knowing and following the various policies (Policy on Commercial Communication, Market Research Policy, etc.) and local procedures. All such persons are expected to follow both the spirit and the letter of the Policy in their activities, to have regard for the opinions and likely impact and understanding of the communication on the intended audience, and for the broader cultural and societal context. This Policy applies to all commercial communication under the control of Asahi Brands Germany GmbH either directly or through agents, partners, staff, etc.



Section A:

Code of Commercial Communication

The Code of Commercial Communication ('the Code') provides Asahi Brands Austria GmbH and its partners, agents and others working on their behalf with consistent, minimum content and placement standards for commercial communication.

The term 'commercial communication' means any communication targeting consumers or potential consumers, any product brand advertising and promotion in all media including direct marketing, digital media, the internet, text messaging, packaging, brand promotions, brand public relations activity, experiential marketing programmes, product placement, merchandising, point-of-sale materials, brand sponsorship and category marketing.

Communication is considered 'commercial communication' and regulated by the Code if it:

- Is targeted at consumers
- Supports brand sale and marketing
- Is conducted directly, indirectly or is being deliberately inspired by a brand

'Commercial communication' does not include research (Market Research Policy applies), communication devoted exclusively to sustainable development and preventing the irresponsible consumption of alcohol, press releases, corporate communication, or statements to the media or government.

Basic Principles

01 Commercial communication must:

- be legal, decent and truthful, accurate, unambiguous, and conform to accepted principles of fair competition and good business practice;
- be clearly distinguishable in its commercial nature;
- be prepared with a due sense of social responsibility;
- comply with all legislative and regulatory requirements;
- not be unethical or otherwise impugn human dignity or integrity;
- be mindful of sensitivities relating to local cultural values, gender, race, sexual orientation, and religion; and
- not employ themes, images, symbols, signs, or figures that are likely to be considered illegal, misleading, offensive, derogatory, demeaning, disparaging, unauthentic, or unnatural.

Preventing Underage Appeal

02 Commercial communication may not be directed at persons under the age of 18.

03 Paid actors or models in commercial communication must be a minimum of 25 years old at the time they are approached to participate and should reasonably appear to be and behave in a way that is consistent with their age. In the case of brand promotions, all members of the promotional teams must be at least 21 years old.

In a controlled environment, where an age affirmation mechanism is used to ensure the user/viewer is of the age of 18 or above, unpaid actors may be younger than 25 years but they must be above the age of 18.

04 All persons visible in user-generated content must be over the age of 18, unless they are incidental and clearly are not alcohol consumers (e.g. within a family photograph). If such content is re-used by or on behalf of Asahi Brands Germany GmbH then clause 3 (above) applies.

05 Commercial communication may not employ cartoons, characters (either real or fictional, including cartoon figures or celebrities), animals, icons, music or other elements that are intended to have primary appeal to persons under the age of 18 (kids and minors).

06 Commercial communication may only be placed in print, radio, television, on any form of digital media including the internet, social media and text messaging, where at least 75 % of the audience is reasonably expected to be at least of the age of 18. A placement will be considered reasonable if the audience composition data reviewed prior to the placement satisfied the placement criteria and were the best available data for that medium at that time.

07 All websites controlled (owned or managed) by Asahi Brands Germany GmbH that serve marketing purposes must include an age affirmation mechanism (e.g. age gating, subscription/remember me option, sign-in with social media profile etc.) to ensure only visitors above the age of 18 enter the website.

08 For all websites under the control of Asahi Brands Germany GmbH, additional controls must be used that include:

- a. Age verification software that places a cookie (small piece of code) on a user's computer to prevent him/her from leaving a site and re-entering their date of birth during the same session in order to gain entry to a site.
- b. Appropriate metadata to support content control software.
- c. Redirection to an appropriate social aspect website intended for underage people for those that fail the age affirmation process.

09 Additional age affirmation prompts should be located within sections of the website where consumers can purchase merchandise.

10 Whenever content from Asahi Brands Germany GmbH controlled platforms is able to be shared, a clear reminder or 'Forward Advice Notice' must be included stating that any recipient must also be over the age of 18.

11 In countries where technology is available to verify consumer data against government databases, Asahi Brands Germany GmbH must consider implementing such technology.

Responsible Drinking

12 Commercial communication may not depict, promote, or sponsor situations where alcohol is being consumed rapidly in large quantities, involuntarily, as part of a drinking game, or as a result of a dare or peer pressure.

13 Commercial communication may not portray persons lacking or having diminished control over their behaviour, movement, vision, or speech as a result of consuming alcohol, or in any way suggest that intoxication is acceptable.

14 Commercial communication may not present refusal, abstinence or moderate alcohol consumption in a negative light.

15 Commercial communication may not depict or suggest alcohol consumption before or during activities that, for safety reasons, require a high degree of alertness, judgment, precision, or coordination (for example driving, operating machinery, or other hazardous activities).

16 Commercial communication may not depict or suggest alcohol consumption during working hours at the workplace, except when portraying taste testers or members of taste panels.

Alcohol Content

17 Commercial communication may not encourage choice of a brand by emphasizing its higher alcohol strength or the intoxicating effect of alcohol generally. Factual information regarding a brand's alcohol content is acceptable on product labels where permitted by law.

Performance

18 Commercial communication may not suggest physical prowess, power, or strength as a result of consuming alcoholic beverages. Anyone who is featured in commercial communication may not be shown consuming beer before or during any athletic event or other endeavor requiring exceptional physical ability, power, or strength.

Health Aspects

19 Commercial communication may not depict or include pregnant women or promote consumption of alcohol during pregnancy.

20 Commercial communication may not claim that alcohol has curative qualities, nor offer it expressly as a stimulant, sedative, tranquilizer, or delivering energizing or stimulating effects or effects on well-being and mental health.

21 Commercial communication may not suggest that alcoholic beverages should be consumed for potential net health benefits.

Violence and Anti-Social Behaviour

22 Commercial communication may not have an association with violent or anti-social imagery or behaviour, with illicit drugs or drug culture, or suggest consumption of alcohol in a way breaching legal regulations.

Social / Sexual Success

23 Commercial communication may not imply that the consumption of alcoholic beverages is essential to business, academic, sporting or social success.

24 Commercial communication may not portray nudity or suggest that alcohol beverages can contribute directly to sexual success or seduction. Anyone who is featured in commercial communication should not be posed in a position or stance that is overtly sexual in nature.

25 Apparel should be appropriate to the overall context of the commercial communication.

Brand Promotions; Promotional and Display Items

26 No brand promotions may be directed at persons under the age of 18.

27 All promotions and promotional materials must follow cultural standards of good taste and not encourage irresponsible consumption of alcohol.

28 No games that require drinking alcohol as an element of the game are allowed.

29 Attendees should be encouraged to assume personal responsibility for their decision whether or not to drink alcohol.

30 Alcoholic beverages must not be supplied to visibly intoxicated persons. Servers must be trained, preferably with a certified programme if available.

31 Water and soft drinks must be available wherever possible during the promotion.



32 All brand promotion materials and retail displays with company or brand logos must comply with the other provisions of this Code. Promotional items or merchandise may not be of primary appeal to persons under the age of 18 (e.g. children's toys).

Responsibility Message

33 Where none is mandated by law, a clearly visible and noticeably placed responsibility message must be included in all commercial communication, wherever appropriate. There are some exceptions for non-alcoholic beer brands (e.g. packaging, s.35), see Annex 1 for further information.

34 A responsibility message is defined by the following statements/icons related to statements:

- a. Don't drink and drive.
- b. For people over the age of 18 only.
- c. Pregnant women should not drink alcohol.
- d. Link to www.aboutalcohol.com or the local version of that website is a mandatory part of responsibility message.

35 With respect to packaging, the following information must occur on both primary and secondary pack:

- Details of how to access www.aboutalcohol.com or the local version of that website; AND
- Three icons representing the three responsibility statements (on drink driving, drinking age being 18, & pregnancy).
 - The design of these icons may vary or be replaced with a written statement, subject to local regulation or consumer recognition.
- Any locally mandated responsibility message, where relevant (e.g. bierbewusstgenießen.de or ddad.de).

For alcohol-free extensions of alcohol brands, primary and secondary packaging must only include:

- Details of how to access www.aboutalcohol.com or the local version of that website; AND
- The icon 18+ or written warning;
- Any locally mandated responsibility message (where relevant).

It is not necessary for alcohol-free brands to include the icons representing the drink driving or pregnancy responsibility messages, but the option to include those remains.

36 A responsibility message or icon should be included in all commercial communication (including downloadable and shareable assets, for example, videos, photos, applications or user- or collaborator-generated content used, or reused by or on behalf of Asahi Brands Germany GmbH), except on permanent point-of-sale items (e.g. glassware, neon signs, chairs), consumer novelty items (e.g. pens or t-shirts) and when the size of an advertising unit makes the responsibility message illegible (for example in digital advertising where the image is equal to or smaller than 80 pixels in both dimensions), where a message is recommended but optional.

Environmental sustainability

37 Environmental sustainability in commercial communication includes "green claims" and "environmental claims" or any other claims that refer to the environmental attributes or impact of a product (or our business more generally). It includes claims that a product has no negative impact, a positive impact, or a comparatively better impact on the environment. Such claims can be based on the composition of products and their packaging, the way they have been manufactured, produced, packaged, distributed, the way they can be disposed of and the reduction in water, energy, waste or pollution which can be expected from using them.

38 Claims must be based on accurate information and then can be made in many ways, both expressed and implied, and include all types of claims, information, symbols, images, logos, graphics, colours, and company, product or brand names. Using misleading, false or inaccurate or ambiguous environmental claims is called "greenwashing" which should be avoided by complying with the following principles:

- a. Green claims must not be likely to mislead, and the basis for them must be clear.
- b. Green claims must be properly substantiated and confirmed by robust evidence.
- c. Material information must not be omitted in the claims. Where time or space is limited, alternative means (such as QR codes, hyperlinks, etc.) must be used to make qualifying information readily accessible.
- d. General or absolute claims (such as "environmentally friendly", "green", "sustainable" "carbon neutral" etc.) should be avoided.
- e. Only products meeting the same needs or intended for the same purpose can be compared in commercial communications and the basis for their comparison must be clear.
- f. Green claims must fully comply with legislation and regulatorily required information.
- g. All the sustainability communication should be backed by evidence data that has been audited/verified and/or a certification or partner that verifies is so audited/verified. When using sustainability terminology or any statement, please make sure to mention the definition of that term; how is it calculated and how is it verified.

Digital Media

39 All content, including user-generated content, on Asahi Brands Germany GmbH controlled (owned or managed) digital platforms should be compliant with this Code. Content should be moderated on a regular and frequent basis.

40 User-generated content that is subsequently used in commercial communication should have the permission of the original user or owner of the content.

41 All content generated in cooperation with, or deliberately inspired by, Asahi Brands Germany GmbH presented on digital platforms managed by external entities and persons cooperating with Asahi Brands Germany GmbH should be compliant with this Code.

42 All websites controlled by Asahi Brands Germany GmbH must show a link to www.aboutalcohol.com or to the local version of that website.

Direct Communication

43 Asahi Brands Germany GmbH must receive specific consumer consent, including date of birth affirmation, prior to delivering one-to-one communication to consumers, excluding the communication to obtain consumer permission itself. One-to-one communication may not be directed at persons under the age of 18.

44 Asahi Brands Germany GmbH should provide a clear and transparent mechanism for consumers to opt out of receiving direct commercial communication.

45 All direct commercial communication and data management processes should comply with the Personal Data Protection and Handling Policy.

Brand Names

46 Brand names and any corresponding packaging, labels, internet and social media domain names may not use disparaging colloquial names (e.g. 'alcopop'), convey sexual innuendo or use terms typically associated with intoxication or irresponsible consumption.

Brand Sponsorship

47 Brand sponsorship for the purpose of the Code means any commercial agreement by which a Asahi Brands Germany GmbH contractually provides financing or other support in order to establish an association between the company's brands and a sponsorship property (e.g. sport, music, community event) for the granting of certain agreed direct or indirect rights or benefits.

48 Sponsorship may also include arrangements where no rights or benefits are granted to an Asahi Brands Germany GmbH, but where the provision of services, financing or support (e.g. providing bar services to an event) may be perceived as a direct endorsement of the commercial partner by Asahi Brands Germany GmbH.

49 Asahi Brands Germany GmbH may not engage in sponsorship agreements unless at least 75 % of the audience for the event (meaning those primarily attending the event) are reasonably expected to be over the age of 18.

50 Asahi Brands Germany GmbH may not engage in sponsorship agreements unless the relevant Sales and Marketing Responsibility Committee approves the nature and elements of the sponsorship proposal.

51 This Code applies to the overall sponsorship agreement, including any sponsored event material carrying company or brand logos, for the duration of the sponsorship agreement. Sponsorship items may not be of primary appeal to persons under the age of 18 (e.g. children's toys).

52 General sport or music sponsorships featuring brand logos are acceptable as long as there is no suggestion in the commercial communication that alcohol consumption contributes to athletic or musical success.

Energy content

53 Beyond the information that must be displayed on packaging by law, energy content information in calories or kilojoules per 100 milliliters must be displayed on primary and secondary packaging of all our products. Other nutrients can be displayed on a voluntary basis, if not stated differently by law.

Section B:

Oversight and Enforcement

This section of the Policy provides Asahi Brands Germany GmbH with consistent, minimum standards for the oversight and enforcement of the Code of Commercial Communication (“the Code”).

Director, the local SMRC can seek out for direction to AEI SMRC committee.

Asahi Brands Germany GmbH believes in the self-regulation of our marketing activities, and of the industry as a whole. This is why we are committed to putting into place effective enforcement procedures in all of the markets in which we operate, including third-party non-industry participation wherever possible.

The Sales and Marketing Responsibility Committee (**SMRC**) outlined herein is responsible for the sign-off, monitoring, and evaluation of all commercial communication, as well as any complaints that the company receives about commercial communication.

The SMRC should also allow for the discussion and deliberation of social and market forces that will affect or impact on communication both now and in the future and should report to the local Executive Committee on its activities and any extraordinary issues that it encounters.

Sales and Marketing Responsibility Committee

54 Asahi Brands Germany GmbH must have an internal Sales and Marketing Responsibility Committee (SMRC).

55 The SMRC must not be chaired by an employee from the marketing or sales division and such employees cannot make up the majority of decision-making SMRC members, although employees from these divisions may participate as members.

56 There must be at least one employee from the corporate affairs and legal departments that participates in the SMRC. Corporate Affairs and Legal represent two mandatory votes within the SMRC voting process.

57 The Committee must include a sustainability expert who in the role of special consultant validates all sustainability-related communication on a mandatory basis.

58 Employees from other divisions may serve on the SMRC based on their overall reputation for good judgment, awareness of cultural diversity or relevant experience and represent optional votes within the SMRC voting process

59 Asahi Brands Germany GmbH is encouraged to participate in a national or industry self-regulatory association with non-industry participation in complaint handling (where available) or to appoint an independent committee member to the SMRC.

60 In the event that the SMRC is unable to reach a consensus on whether a commercial communication complies with the Code, the SMRC Committee members shall appeal to the Managing Director, who shall act as the final arbitrator after considering the conflicting viewpoints. If the agreement cannot be found even after engaging the local Managing

Enforcement and Monitoring

61 The SMRC is charged with ensuring that all commercial communication, as defined, complies with the Code. This includes, but is not limited to, product brand advertising and promotion in all media, including direct marketing, digital media, the internet, text messaging, packaging, brand promotions, brand public relations activity, experiential marketing programmes, product placement, merchandising, point-of-sale materials, brand sponsorship, and category marketing.

62 If the commercial communication targets two or more AEI markets it needs to be approved by the regional SMRC first.

63 Approval and monitoring processes and procedures should be specified in the terms of reference of the SMRC to support compliance with the Code within new ways or new platforms of commercial communication including, but not limited to mechanisms for:

- a. Final review and approval of all commercial communication, including that which has been modified as a result of SMRC feedback.
- b. Assessing compliance with the 75% threshold for audience data.
- c. Approval of concept, main features, themes, proactive and static content and of model responses for digital platforms.
- d. Monitoring and moderating user-generated or interactive content, including social media sites, comment walls, interactive features, applications etc.

64 Outcomes of the moderation process and actions taken in relation to user-generated content should be reported to the SMRC regularly.

65 The SMRC will ensure that the marketing or sales team are monitoring the latest available audience data for relevant outlets on an ongoing basis to ensure all Asahi Brands Germany GmbH are meeting the 75% threshold using reasonably available data.

66 The SMRC is also charged with submitting regular data to AEI and Asahi Group Holdings to confirm compliance with local advertising codes, including declarations on audience share

67 All marketing contracts of Asahi Brands Germany GmbH must include a reference to the Code that requires them to abide by the Code in their activities.

Complaints

68 The SMRC is responsible for creating and managing a complaints mechanism.

69 The complaints mechanism:

- a. Must be transparent and readily accessible to those inside and outside of the company.
- b. Must conform to agreed best practice standards to ensure that it is robust, independent and impartial.
- c. Should link to relevant external independent complaints mechanisms where possible, so that complaints can be escalated or dealt with externally where necessary.

70 The complaints mechanism could be a recognized external mechanism that meets the requirements of the Code and that acts independently to review complaints on behalf of Asahi Brands Germany GmbH.

71 Asahi Brands Germany GmbH is encouraged to make decisions arising from the complaints mechanism available publicly.

Education

72 The SMRC is charged with providing internal and external marketing and sales personnel with a copy of the Code on an annual basis. New marketing and sales employees or agencies shall receive a copy of the Code as part of the induction programme.

73 The SMRC is charged with overseeing and ensuring the implementation of training related to the Code for relevant employees, which shall be conducted on an annual basis. Particular care should be taken in providing training to members of the SMRC to ensure understanding of the scope and application of the Code.


Reporting











74 As a governance body that makes decisions on behalf of an Asahi Brands Germany GmbH, the SMRC shall report regularly to the local Executive Committee on its activities including decisions arising from the complaints mechanism.



Annex I:








Rules for Non-Alcoholic Beer Brands

These rules are applicable to commercial communication of non-alcoholic beer brands. If any questions arise on how to apply the document, please contact your local SMRC.

 =the rule remains same  = the new rule is applied

AREA	CURRENT RULE	NON-ALCOHOLIC LINE EXTENSIONS OF ALCOHOLIC BRANDS	STAND-ALONE NAB BRANDS	EXPLANATION
PREVENTING UNDERAGE APPEAL	Commercial communication may not be directed at persons under the age of 18.			
	Paid actors or models must be older than 25 years (the promotion team must be at least 21 years old).			<p>Paid actors, models or promotion team must be older than 18 years and should reasonably look and behave in a way that is consistent with their age.</p> <p>The environment of commercial communication must be of adult nature.</p> <p>When communicating stand-alone non-alcoholic flavoured brands only, non-paid/paid actors may be younger than LDA, but they must</p> <ul style="list-style-type: none"> be older than 12, only appear in the background of the communication visual, not consume the product being advertised. <p>Such commercial communication using actors younger than 18 must be mindful of sensitivities relating to local cultural values and market/public perception of the brand and approved by SMRC.</p>
	In a controlled environment, non-paid actors may be younger than 25 years, but above LDA.			
	Commercial communication may not use cartoons, characters, etc. that are intended to have primary appeal to persons under LDA.			
	Commercial communication must comply with the 75:25 rule			see below
	All websites must be controlled by age affirmation mechanism.			Websites of stand-alone brands do not have to have age gates.

AREA	CURRENT RULE	NON-ALCOHOLIC LINE EXTENSIONS OF ALCOHOLIC BRANDS	STAND-ALONE NAB BRANDS	EXPLANATION
RESPONSIBLE DRINKING	Commercial communication may not depict, promote or sponsor situation where alcohol is being consumed rapidly, involuntarily, as a part of drinking game.			
	Commercial communication may not portray intoxicated persons.			
	Commercial communication may not present refusal, abstinence or moderate alcohol consumption in a negative light.			
	Commercial communication may not depict or suggest alcohol consumption before or during activities that, for safety reasons, require a high degree of alertness, and judgment.			Commercial communication must be mindful of sensitivities relating to local cultural values and market/ public perception of the brand.
	Commercial communication may not depict or suggest alcohol consumption during working hours at the workplace.			
ALCOHOL CONTENT	[Not relevant] Commercial communication may not encourage choice of a brand by emphasizing its higher alcohol strength or the intoxicating effect of alcohol generally.		<i>Not relevant.</i>	
PERFORMANCE	[Not relevant] Commercial communication may not suggest physical prowess, power or strength as a result of consuming alcohol beverages.		<i>Not relevant.</i>	
	Commercial communication may not show consuming beer before or during any athletic event or other endeavor requiring exceptional physical ability, power or strength			Commercial communication must be mindful of sensitivities relating to local cultural values and market/ public perception of the brand.
HEALTH ASPECT	Commercial communication may not depict or include pregnant women or promote consumption of alcohol during pregnancy.			
	Commercial communication may not claim that alcohol has curative qualities, energizing or stimulating effects, etc.		<i>Not relevant.</i>	All nutritional and health claims must follow regulatory approval process and be approved by quality assurance and legal teams.
	Commercial communication may not suggest that alcohol beverages should be consumed for potential net health benefits			
VIOLENCE AND ANTI-SOCIAL BEHAVIOR	Commercial communication may not have an association with violent or anti-social imagery or behavior.			
SOCIAL/ SEXUAL SUCCESS	Commercial communication may not imply that alcohol beverage consumption is essential to business, academic, sporting or social success.		<i>Not relevant.</i>	

AREA	CURRENT RULE	NON-ALCOHOLIC LINE EXTENSIONS OF ALCOHOLIC BRANDS	STAND-ALONE NAB BRANDS	EXPLANATION
BRAND PROMOTIONS	Commercial communication may not be directed at persons under LDA.			see below
	No games that require drinking alcohol as an element of the game are allowed	<i>Not relevant.</i>		
	Water or soft drinks must be available during the promotion.			
RESPONSIBILITY MESSAGE	Responsible drinking message must be included in all commercial communication.	Responsible drinking message is mandatory for primary and secondary packaging and for all commercial communication materials.		LDA warning logo (or written equivalent) and responsibility website must be displayed on primary and secondary pack of non-alcoholic beers, or similar brand extensions. It is not necessary for alcohol-free brands to include the icons representing the drink driving or pregnancy responsibility messages, but the option to include those remains.
DIRECT COMMUNICATION	Direct communication must be directed at persons above LDA.			
BRAND SPONSORSHIP	Brand may not engage in sponsorship agreements unless at least 75 % of audience is adults.			see below
	Brand sponsorships must be approved by local SMRC.			

AREA	NON-ALCOHOLIC LINE EXTENSIONS OF ALCOHOLIC BRANDS	STAND-ALONE NAB BRANDS	75:25 RULE -> 50:50 RULE
Placement in media (digital, print, TV)			It is allowed to promote stand-alone NAB brands at events/in media/via sponsorships where at least 50 % of the audience is reasonably expected to be of the age of 18. Commercial communication shall not emphasize the beer aspect of the drink, if the rule 50:50 is to be applied.
Sponsorships agreements			
Event management			

PLACEMENT ON SHELVES

Non-alcoholic line extensions may be placed:

- in beer sections (primary placement)
- anywhere, but not near products with a clear underage appeal (secondary placement)

Stand-alone brands may be placed:

- anywhere, but not near products with a clear underage appeal (primary and secondary placement)

Annex II:

Rules for Craft Breweries

Commercial communication of Craft Breweries shall be governed by the rules and principles included in POCC. However, the exceptions below provide space for craft beers to differentiate their commercial communication from the standard commercial communication of other brands.

Definition of Craft Beer

01 This policy applies to any brewery brewing seasonal, special and small-batch beers amounting to less than overall capacity of 30 thousand HL per year.

Exception to the rules concerning the Sales and Marketing Responsibility Committee

02 Craft beer commercial communication is not approved by the Sales and Marketing Responsibility Committee. The role of the Sales and Marketing Responsibility Committee as described in Section B: Enforcement and Monitoring shall be replaced by the Corporate Affairs and Legal department representatives. These two individually approve craft beer commercial communications that are not in the brand's standard visual lineup. Both approvals are needed before any communication is released.

Exception to the rules concerning the responsible drinking message

03 The rules for using the responsible drinking message follow the principles stated in this policy in section A, paragraphs 33 – 36, and display of energy content as set in section A, paragraph 51.

The usage is governed by the Corporate Affairs and Legal department representatives, who are also approving the artwork of the icons and wording and display of the responsible drinking message. The basic requirements concerning the responsible drinking message include:







- a. The responsible drinking message must be in the format of an easily comprehensible message or text which discourages consumers from irresponsible alcohol consumption.
- b. The responsible drinking message must be clearly visible and legible and contains all parts: no drinking while driving, no drinking by pregnant women, no drinking by underage persons, and access to www.aboutalcohol.com or the local version of that website.

04 Display of energy content in calories/kilojoules per 100 ml is also mandatory.

05 Other conditions shall remain unchanged. In the case of any questions, get in touch with your local Sales and Marketing Responsibility Committee.

Annex III:

5 safeguards for digital platforms

	GENERAL PRINCIPLES						
AGE-AFFIRMATION MECHANISM	Access to commercial alcohol communications should be restricted to adult consumers only.	<ul style="list-style-type: none"> Select category: "Brewery" settings General Age restrictions "Alcohol-related". 	<ul style="list-style-type: none"> Requested from your Account Manager. 	<ul style="list-style-type: none"> Requested from your Account Manager. 	<ul style="list-style-type: none"> Set at channel level and at video level. 	<ul style="list-style-type: none"> Composed of date of birth, Country of residence, and might contain a „Remember me“ disclaimer. 	<ul style="list-style-type: none"> Ideally at the pre-installation stage or after the first-time login to app.
FORWARD ADVISE NOTICE(FAN)	Consumers need to be informed and reminded of their responsibility that commercial alcohol communications should not be shared with underage people in order to protect minors.	<ul style="list-style-type: none"> In the 'About' section i.e. "Please only share our posts with those who are of legal drinking age". 	<ul style="list-style-type: none"> In the description i.e. "Forward to those of legal drinking age only". 	<ul style="list-style-type: none"> In the description the landing page i.e. "Please do not share or forward to anyone underage". 	<ul style="list-style-type: none"> In the description of the channel and/or in the 'About' section. 	<ul style="list-style-type: none"> Only required if the website does allow shareable/ forwardable content. 	<i>Not relevant.</i>
RESPONSIBLE DRINKING MESSAGE (RDM)	It needs to be clear that brands are committed to responsible drinking and that they strongly encourage their consumers to enjoy their products in moderation.	<ul style="list-style-type: none"> Included at least once, in either the 'About' section of the cover photo, with link to local RM website or aboutalcohol i.e. "Drink <brand> in moderation". 	<ul style="list-style-type: none"> In the description with link to RM website i.e. "Please enjoy <brand> responsibly". 	<ul style="list-style-type: none"> Included at least once, in either the 'About' section of the cover photo, with link to RM website 	<ul style="list-style-type: none"> Included at least once, in either the 'About' section of the cover photo, with link to RM website 	<ul style="list-style-type: none"> It should be easily visible on the landing page, with link to RM website 	<ul style="list-style-type: none"> It should be easily visible on the main description of the app, at the pre-installation stage.
TRANSPARENCY / OFFICIAL SIGNPOST	Digital marketing activities shall be carried out in transparent way in order to avoid misleading consumers about their commercial purpose.	<ul style="list-style-type: none"> "Verification badge" from Account Manager or in the 'About' section of official website of brand. 	<ul style="list-style-type: none"> "Verification badge" from Account Manager. 	<ul style="list-style-type: none"> "Verification badge" from Account Manager 	<ul style="list-style-type: none"> Official signpost or in the 'About' section. "This is the official <include brand> channel". 	<ul style="list-style-type: none"> Made clear through the trademark, terms & conditions, official company information, etc. 	<ul style="list-style-type: none"> Logo / Brand name / identifying company info should be easily visible on the main description of the app, at the pre-installation stage.
USER-GENERATED CONTENT	It needs to be clear that brands do not condone any user-generated content that would promote inappropriate or excessive alcohol consumption.	<ul style="list-style-type: none"> In the 'About' section as link to a website with the policy in the 'More Info' section; or directly mentioned in the 'Story' section. 	<ul style="list-style-type: none"> Through a self-evident web address leading to the UGC policy. However non-clickable, it leads to a real website. Or in a visible way on the branded website, provided that in the Profile bio it's stated that the UGC rules can be found there. 	<ul style="list-style-type: none"> In the description. 	<ul style="list-style-type: none"> In the 'About' section: 	<ul style="list-style-type: none"> Only required if the website does allow for UGC. 	<i>Not relevant.</i>