
Marketing Code

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Policy Statement

This Responsible Marketing Code sets out the principles that we will adopt in marketing our brands across the world.

Overall accountability for the Code lies with the Chief Marketing Officer (CMO). Responsibility for Code compliance lies with the Business Unit (BU) Marketing Directors or Managing Directors.

Who does it apply to?

Communication and understanding of the Code is the responsibility of individual BUs and must cover all marketing teams, as well as customer management representatives and external partners.

The Code sets out the principles that we will adopt in marketing our brands across the world, whether marketed by us or any of our partners – and applies to companies who license our brands. For brands we bottle on behalf of others, we follow their own marketing codes and policies. It applies to all marketing and advertising activities.

All external marketing and other partners must be fully briefed on the terms of the Code and comply with its conditions. The requirement to comply with the Code must be included in the terms and conditions of all contracts and in all activity/project briefs.

Policy Detail - What do I need to know or do?

We follow relevant applicable national and local legislation and regulation. We also support voluntary industry codes of practice, wherever possible. All marketing activity must be in keeping with both the letter and the spirit of legislation, regulation and such codes.

Promoting Healthier People

- The health of our consumers really matters to us. Our business was built on bringing an affordable source of vitamins to consumers at a time when diets lacked important nutrients. We've never forgotten our history and today we do our best to make it easier for our consumers to make healthier choices and enjoy life's everyday moments.
- We believe that any of our drinks can be enjoyed as part of a

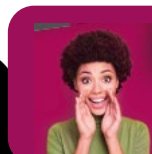


balanced diet and healthy lifestyle. However, we aim to encourage positive behaviour change, and recognise that our brands can play a powerful role in supporting this ambition.

- We will not encourage excessive consumption of any of our drinks, and will bring our influence to bear on areas outside of our control, e.g. cinemas.
- We will not run promotions requiring repeat or multiple purchases (collector schemes).
- Where both regular and reduced calorie variants of a brand exist, we will include the reduced calorie variants in marketing.
- We will comply with local legislation when making health and nutrition claims, and if no such legislation exists, these claims will be based on sound scientific evidence.
- We acknowledge that our brands can be mixed with alcohol or consumed in an environment where alcohol is available, and any marketing activity in this context must support the principle of responsible drinking. Any marketing in conjunction with alcohol will not target those younger than the legal purchase age for alcohol and consumers featured must be over 25 years old.
- We will not market high caffeine products to children under 16.
- We will not associate our high caffeine products with alcohol.
- Our marketing will reflect the richness of the markets and communities where we operate and promote diversity and inclusion in society.

We believe that a responsible approach to marketing to children is a central component in the creation of building trusted, accessible brands, and we are committed to supporting the right of parents and carers (the gatekeepers) to make the appropriate choices for their children.

- We will not advertise our products in any media that directly targets children under 12. This includes any media in which 35% or more of the audience is composed of children under 12.
- We will not use celebrities or licensed characters whose primary appeal is to children under 12.
- We will not use movie-tie ins related to movies of primary appeal to children under 12.
- We will ensure that any competitions or promotions for children under 12 require the consent of the gatekeeper – and take all reasonable steps to ensure that gatekeepers are notified when we receive an entry form for any activity relating to their children under 12.
- Where we show children under 12 in our marketing communications, they will reflect the principles of a balanced diet and active lifestyle.
- We will only use games and gaming in a family setting like a restaurant, and when the gatekeeper's permission and supervision is sought
- We won't sample children under 12 without the gatekeeper's consent.
- We respect the right for schools to be a commercially free environment. We are happy to make our drinks available where they



comply with codes and we may, where requested, support charitable giving and social marketing campaigns, but these will not promote our products. We will not market our drinks in schools – with the exception of our water brands, where invited by school authorities.

Promoting a Healthier Planet

A healthier planet is one where resources are used responsibly and the natural world is protected, so that future generations can continue to enjoy life's everyday moments. We are playing our part, focusing on the small changes and innovations that will contribute to a better world in the longer term.

From the sourcing of our natural ingredients to the manufacturing and distribution of our drinks, we are committed to doing right by the environment, creating A Healthier Everyday for today and tomorrow.

Our marketing will not contravene our Healthier People, Healthier Planet commitments, and wherever possible, will actively support them. For example:

- Where appropriate, our consumer and trade marketing will encourage the promotion of a healthier planet by encouraging recycling and reducing the impact of littering. And in GB & Ireland all consumer and trade advertising will carry recycling messages.
- We will leverage the scale and reach of our brands to inspire change and as such all our packaging will carry recycling messages that enable consumers to dispose of packaging correctly and responsibly.

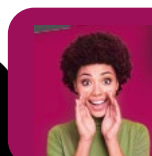
In addition to our specific marketing code focus areas, it is our policy to:

- Comply fully with all applicable environmental laws and regulations.
- Set targets that will positively influence healthier consumer choices. For example, our Mission 2025 healthier choices target: < 30 calories / 250ml serve.

Sustainable Brand Claims

As we support consumers in sustainable choices, we will ensure any sustainable brand claims are clear and grounded in evidence.

- A product wide benefit requires a full impact analysis. This should be documented and verification by a 3rd party is best practice.
- If the claim is focused on one element i.e. packaging or ingredients then the claim should be clearly specific to that and shouldn't imply a wider overall benefit.
- We will avoid general terms such as "greener". Care should be taken in relation to general terms. E.g. "sustainable" and "environmentally sustainable" claims cannot be substantiated as there is no validated



way of measuring this yet.

- We will only make claims which are relevant issues to our business and business strategy e.g. plastic reduction, water usage etc.
- When making comparative environmental claims we will take extra to ensure the claim is clear, relevant and accurate. The basis of the comparison should be consistent.
- Broad sweeping statements will be avoided and relevant information to the consumer will be included to help understanding. We will avoid jargon terms that could be misunderstood.
- We will avoid vague and exaggerated claim e.g. “less waste” is a vague statement, which cannot be substantiated; “less plastic” is more specific.
- We will ensure there is no risk of misleading the consumer or any risk of the claim being misinterpreted.
- If the claim requires a supporting statement this should be presented in a clear way, with a legible text size and linked by an * to the claim itself.
- Logos or images should include a supporting statement if required to explain the image. They should not exaggerate the benefit in any way.

All brand claims and supporting evidence require approval by our Regulatory team.

What happens if I don't follow this policy?

It is our personal responsibility to do the right thing for ourselves, for each other, and for Britvic. This behaviour is the beating heart of our “We Own It” value. Not doing the right thing or asking for support, could impact your myPerformance end of year rating, and any potential breach may lead to disciplinary action being taken.

Related Documents

- Marketing Privacy Code
- Social Media Policy

