



SUNTORY
GLOBAL SPIRITS

Marketing Code
of Practice

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Introduction

Suntory Global Spirits Inc. (“Suntory Global Spirits”) proudly produces and markets some of the world’s finest beverage alcohol products in many countries around the globe. Production and consumption patterns differ widely from one country or region to another and particularly with regard to different categories of beverages, all of which have their own individual characteristics and place within respective local cultures. With this in mind, the Suntory Global Spirits Marketing Code of Practice (the “Code”) demonstrates our commitment to the responsible advertising and marketing of our brands.

As a global leader in premium spirits, we offer our consumers the keys to responsibility through drink smart® (www.drinksmart.com). Likewise, all of our Suntory Global Spirits personnel must familiarize themselves with this Code and the principles of drink smart® in order to convey a message of responsibility, both in consumption and in our marketing and advertising.

Responsible marketing of our products is at the core of our commercial purpose. The Code is about conducting our business the right way, the Suntory Global Spirits way. As we grow our business around the world, we will continue our leadership in responsible consumer communications through the highest standards of responsible marketing practices

Purpose of Code

The purpose of this Code is to set the standard for responsible marketing and advertising directed to legal purchase age (LPA) adults who choose to drink. Our objectives for sales, marketing, promotion and advertising activities are to compete for brand choice among LPA consumers, and to deliver responsible communications that speak to those consumers.

Our commitment to responsibility is demonstrated by upholding the highest standards in brand marketing and reminding LPA adults who choose to consume beverage alcohol to do so with respect and in moderation.

In many countries, there are national or regional advertising and marketing codes, laws and regulations, both mandatory and self-regulatory. This Code is intended to complement these local codes and requirements while also providing responsible company standards in countries where marketing codes and local regulations are not yet in effect.

Our Code and the principles it contains also provide guidance to those with whom we do business, to help ensure our brands are marketed and promoted in a responsible manner to LPA adults. We also expect and require our partners to employ the high standards we have set for the promotion and sale of our brands.

Compliance with this Code is mandatory for all of the Suntory Global Spirits family of companies.

This Code applies to all our beverage alcohol products, including those sold on behalf of third parties. This Code applies to all brand advertising, consumer communications, trade advertising, promotions (both on- and off-premise), sampling, merchandising, brand websites and direct marketing, point-of-sale materials, brand innovation, consumer planning and research, consumer public relations, events, sponsorship activities and product placement.



Advertising and marketing must:

- Be directed to LPA adults.
- Have content which is designed to appeal to LPA adults and is never intended to be directed towards or primarily appeal to those under LPA.
- Be placed in media outlets and locations where at least 70% of the audience is reasonably expected to be LPA adults. This percentage may be higher in some markets (e.g. United States where the Media Placement Standard is 75% of LPA, reaching an annual aggregate of 85% of LPA).
- Be legal, decent and truthful, conforming to the accepted principles of fair competition and good business practice.
- Maintain social and ethical standards with respect to gender and cultural differences.
- Reflect Suntory Global Spirits's commitment to social responsibility.

I. Responsible Consumption:

Advertising and marketing must:

- Present our brands to consumers in a responsible manner.
- Not encourage excessive or irresponsible consumption or present abstinence or moderation in a negative way. This applies to the amount of beverage alcohol being consumed as well as the manner in which it is portrayed.
- Never suggest any association of alcohol consumption with violent, daring, dangerous, unruly or anti-social activities.
- Never suggest any association with illegal drugs or drug culture.
- Not suggest, condone or promote intoxication or excessive drinking.
- Not be directed to pregnant women or women trying to become pregnant.

2. Directing Marketing and Advertising to LPA Adults:

Advertising and marketing must:

- Be directed and designed to appeal to a LPA adult audience.
- Not depict children or portray objects and images, such as Santa Claus or cartoon figures, or placed and /or constructed in a way that primarily appeals to persons below LPA.
- Not appear in sections of newspapers, magazines or other publications or programming that might specifically appeal to those under LPA (e.g. comic pages).
- Not employ or utilize religion or religious themes.
- Not associate our brands with the attainment of, or "rite of passage" to, adulthood.

- Employ actors and models in advertisements, promotional materials or point-of-sale, proven to be at least 25 years old, substantiated by proper identification, who reasonably appear to be 21 years of age and older. Athletes, celebrities, spokespersons, and influencers of legal purchase age that are generally recognizable to the intended audience are not considered models or actors; however, such individuals should reasonably appear to be 21 years of age or older and should not primarily appeal to persons below the legal purchase age.
- Not use the term “Spring Break” in promotional related activities or materials. This is a term synonymous with spring recess/vacation from school for those under LPA in North America.

3. Responsibility Message:

Advertising and marketing must:

- Include a responsible drinking message. This message must be placed horizontally and be clearly legible and noticeable to consumers.
- Placement and message may vary across marketing materials and will be determined by the size and material of the communication element.
- Further guidance is provided in the Social Responsibility Statement Execution Guidelines document on the Suntory Global Spirits Stir Portal.
- The only exception is when the item is so small that the message would be illegible and no other creative alternatives exist for inclusion.

4. Hazardous and Dangerous Activities:

Advertising and marketing may:

- Suggest or depict consumption of beverage alcohol as part of relaxing or celebration after active recreation or work, as long as the setting and depiction make it reasonably clear that the activity requiring alertness or coordination has ended. One example would be an “après-ski” celebration in a ski lodge.

Advertising and marketing must:

- Not encourage or condone driving mechanically propelled vehicles or operation of potentially dangerous machinery while under the influence of alcohol.
- Not depict actual consumption of our products.
- Not depict alcohol beverage consumption with participation in activities that could be particularly dangerous while consuming alcohol, such as swimming, sailing, bicycle riding, skiing, horseback riding; or the performance of potentially hazardous activities of any kind which require a high degree of alertness.



5. Performance, Medical and Therapeutic Claims:

Advertising and marketing must:

- Not create the impression that consumption of alcohol enhances mental ability or physical performance.
 - Not suggest alcohol has medicinal and therapeutic qualities.
 - Not attribute the ability to prevent, treat or cure a human disease to alcohol or refer to such properties.
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6. Alcohol Content:

Advertising and marketing must:

- Only display truthful information on alcohol strength and not emphasize alcohol strength as a positive attribute of the brand.
 - Not misrepresent the alcohol strength of the brand or its alcohol content.
 - Not imply that consuming brands of low alcohol strength will avoid abuse or intoxication.
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7. Social Content:

Advertising and marketing may:

- Portray alcohol consumption as part of responsible personal and social experiences.

Advertising and marketing must:

- Not suggest the success of an occasion depends on the presence or consumption of alcohol.
 - Not contain claims that individuals can attain social, professional, educational or athletic success or status as a result of beverage alcohol consumption.
 - Not create the impression that consumption of alcohol will increase confidence, popularity or social success.
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8. Sexual Content:

Advertising or marketing may:

- Portray people in a social or romantic setting showing affection, or who appear to be affluent or attractive.

Advertising and marketing must not contain or depict:

- Alcohol consumption as enhancing sexual attractiveness or as a requirement or enhancement for sexual success.
- Graphic or gratuitous nudity, overt sexual activity, promiscuity or sexually lewd or indecent images or language.
- Words or imagery that may offend local and generally prevailing standards of taste and decency.

9. Consumer Research Policy:

- All consumer research will be conducted only with consumers of LPA. No effort will be made to learn about consumers' habits, practices, beliefs or any other points of view about alcohol brands as they held them prior to reaching LPA.
- Consumer research from a specific market cannot be utilized in brand planning for markets where the LPA is higher than the LPA in the market where the research was conducted, unless all research participants are over the LPA in both markets.

10. Product Innovation and Presentation:

- Suntory Global Spirits will not develop or promote its brands as “energy drinks.”
- Suntory Global Spirits will not promote its brands with any products marketed as energy drinks.



11. Promotional Events, Sampling and Sponsorships:

Promotional and sponsorship activities must not encourage irresponsible, excessive or illegal consumption.

- In line with other elements of this Code, Suntory Global Spirits will ensure that promotional and sponsorship activity:
 - Is directed to LPA adults.
 - Any staff, models or volunteers must be at least LPA.
 - Maintains social and ethical standards with respect to gender and cultural differences.
 - Meets all national (and local) legal and regulatory requirements, including charitable fundraising laws.
- Specifically, promotions cannot encourage:
 - Rapid drinking
 - Drinking and driving
 - Binge drinking
 - Exceeding any recognized government consumption guidelines
 - Intoxication
- Branded merchandise will not be offered and must not have a primary appeal to those under LPA.
- Suntory Global Spirits will only engage in promotions, samplings and sponsorship when at least 70% of the audience in the setting can be expected to be of LPA. This percentage may be higher in some markets (e.g. United States where the standard is 75% of LPA, reaching an annual aggregate of 85% of LPA).
- When organizing sampling or promotional events, follow these guidelines:
 - Sampling of beverage alcohol must not be offered to those under LPA.
 - Prior to undertaking any sampling activity, all necessary approvals must be obtained (including any necessary permit, license and/or regulatory approvals).
 - Sampling and promotional events must encourage responsible consumption and behavior, they should discourage any activity that would encourage excessive/abusive consumption.
 - All sampling personnel must be LPA or older, briefed on the Code, and understand local/ regional laws and regulations.
 - Consideration should be given to providing water, or non-alcoholic drinks and light snacks, where allowed.



- Any sponsorship involvement with activities that might be hazardous after alcohol consumption (e.g. motorsports) must ensure that no link is made suggesting that alcohol consumption is appropriate while undertaking such activities; nor that success in these pursuits is enhanced by alcohol consumption.

12. Electronic/Digital/Direct Marketing:

- The standards of the Code apply to all media platforms, including digital media, which is used to transmit commercial communications made or generated by Suntory Global Spirits. Guidelines for digital marketing can be found on the Beam Stir Portal/Digital Marketing Guidelines. The Digital Marketing Guidelines apply to branded digital marketing properties, including but not limited to brand websites and brand pages, social network sites and blogs, as well as mobile communications and applications.
- Given the rapidly changing pace of digital media, the policies outlined may not always address a specific situation. Where our policies do not cover a specific circumstance, clearance process must be followed through Marketing, Legal and/or Industry Affairs.

13. Product Placement:

Product placement in movies, television or music video productions will be considered if:

- The production is directed and primarily appeals to an adult audience.
- Content does not feature underage drinking, excessive drinking or other irresponsible consumption such as driving while intoxicated.
- Content does not feature violence or aggression linked to alcohol consumption.
- Primary characters are of LPA.
- Exceptions may be made on a case-by-case review and assessment of overall thematic content.

Product placement will only be approved if:

- Sufficient information is provided to prove the specific scene and setting in which the brand(s) will be featured and the overall context in which the brand and the character(s) consuming beverage alcohol in the production are compliant with the social responsibility guidelines outlined in this Code.
- Written consent is provided to producers and film companies to use our brands. If a script is deemed inappropriate, written communication must be sent to the relevant party denying permission to use the brands.

14. Licensing and POS:

The following are examples of items which are inappropriate for point-of-sale, merchandising or licensing:

- Materials primarily appeal to persons under LPA.
- Candy, except for gourmet chocolates or other high-end confectionery items which are clearly intended for adults.
- Sexual paraphernalia, e.g., condoms.
- Drug-related paraphernalia.
- Guns, knives or items generally referred to as weapons, except tools or cutlery items for culinary purposes and adult sporting activities.

15. Compliance Procedures:

- All Suntory Global Spirits personnel must be familiar with this Code and comply with all its provisions.
- Advertising agencies, market research companies, media buyers and other third parties involved with the marketing and advertising of our brands must receive a copy of this Code and must abide by its provisions in any work they do on behalf of Suntory Global Spirits and its brands.
- All Suntory Global Spirits personnel responsible for marketing and promotional materials and activities must complete compliance training and are required to adhere to this Code and take part in periodic training.
- All regional businesses must establish and adhere to processes to ensure compliance to the letter and the spirit of this Code, local laws and regulations, consumer promotions and privacy laws, intellectual property laws and best practices, and applicable national and regional advertising marketing codes.
- Code compliance is the fundamental responsibility of our in-market business general managers, and covers all marketing, advertising and promotional materials and activities in the on- and off-trade and is required for brand innovation activities, brand launch campaigns, consumer public relations and all other brand communication activities.
- Complaint procedures for alleged non-compliance with the Code are included on the corporate website (www.BeamSuntory.com) to allow interested parties to register potential grievances confidentially.
- Suntory Global Spirits will evaluate alleged grievances regarding Code compliance registered with the company and record and respond to the parties registering such grievances, as deemed appropriate.

For further information on the Suntory Global Spirits Marketing Code of Practice, or corporate social responsibility issues, please contact:
MarketingCode@beamsuntory.com

DRINK  SMART®

Drink Responsibly
www.drinksmart.com