

EDRINGTON



Marketing Code

AUTUMN 2023

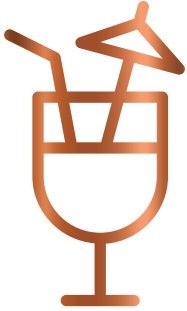
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Basic Principles

As a responsible company, it is important that our brands are promoted and enjoyed responsibly. This Code makes sure our brands are promoted in line with our ethics and values, while respecting different cultures, lifestyles and traditions.

The principles of the Marketing Code cover all commercial communications in all markets. They are the minimum standards that everyone must follow, whether you are an Edrington employee or providing services to our brands. For professionals engaged in marketing, communication, sales, event organisation and procurement, a series of annexes provide detailed guidance on how to interpret and apply each area of the principles set out in this document. These are available within the Corporate Affairs section of Edrington's intranet and will be provided to suppliers, who must follow our Marketing Code. The Code is supported by a training programme available on Edrington's online training platform.



Responsible Drinking

The marketing of our brands should always portray responsible behaviour. We don't condone drinking quickly, binge drinking or drunkenness. We also respect that some people choose not to drink alcohol.

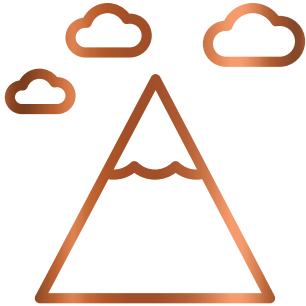
In all markets, alcohol responsibility messages must meet regulations.

- 'Please enjoy responsibly' must be clearly visible on all advertising and point of sale materials.
- UK and EU labels must carry Edrington's consumer information panel and include drinkaware.co.uk in the UK, responsibility.org in the US and responsibledrinking.eu in the EU. Other markets should include the local equivalent.
- In relevant markets we must provide unit or standard drink information (strength must not be the dominant theme).
- Alcohol labels should carry icons advising against drinking in pregnancy or before driving.



Drink driving

We never condone driving a motor vehicle after drinking or show consumption that could be interpreted as associating drinking alcohol with driving a vehicle.



Potentially dangerous activities

We do not link drinking to increased confidence or bravado.

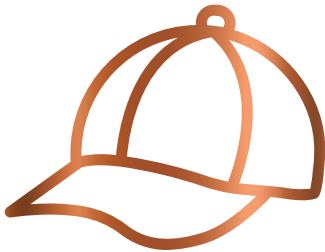
And we never associate drinking with using machinery, driving, sports that could be dangerous (like swimming) or doing anything hazardous.



Sexual and social success

We should not claim that someone can attain social, professional, educational, or athletic success due to drinking alcohol. Or that drinking can help overcome inhibitions or social barriers.

As well as adhering to accepted standards of good taste, we must not associate drinking with sexual activity or success or suggest that it enhances sexual abilities or attractiveness.



Discouraging under age drinking

We must not promote alcohol to anyone below the legal purchase age (LPA). This means we only feature people who are (and look like they are) above LPA and anyone shown drinking must be at least 25 years old.

It also means we never use images, brand logos, celebrities or media that might appeal to those below the LPA, or associate products with a 'rite of passage' to adulthood.



Alcohol and health

We must not imply that alcohol can enhance mental or physical capabilities. This includes suggesting it has therapeutic qualities or the ability to treat illness or change mood or behaviour.

Specifically, our brands must not be promoted with energy drinks.



Equal representation and social policies

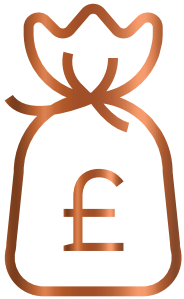
Our marketing should reflect a modern, equal society. We must always make sure women are represented and part of the decision-making process on projects.

During creative development, we should ensure all roles are fair and representative, not stereotypical or defined by gender, and that there is fair and equal representation in lead roles and on production teams.



Inappropriate associations

We do not link drinking to anti-social or illegal behaviour, or to any violent, aggressive or harmful behaviour. We never associate drinking with illegal drugs.

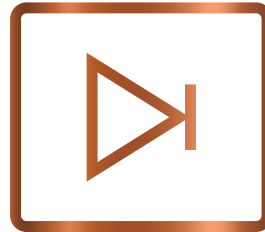


Sponsorship

All new sponsorships must contain a commitment to promoting responsible drinking or supporting diversionary or community activities. We do not sponsor individuals, teams, events, tournaments, competitions, bands or celebrities who have a particular appeal to people under the LPA.

When conducting events, we must encourage responsible drinking. This includes not offering alcohol that exceeds recommendations or promoting consumption in conjunction with irresponsible behaviour such as drinking quickly.

Anyone carrying out sampling must comply with local licensing laws and be of LPA. The dress code for brand and sponsored events should respect the brand, the cultural environment and the person wearing it.



Media

All digital activity – from mobile messaging and online advertising to social media, blogs and websites - must comply with this Code.

Our marketing must be aimed at an audience over the LPA. For websites, our standard mandatorys cover Terms and Conditions, Privacy and Cookies, responsible drinking links and age affirmation 'gateways'.

Our Social Media guidance gives advice on underage access, transparency, and managing your own accounts as brand custodians, including dealing with confidential information and data privacy compliance.

More detailed guidance is available within the annexes designed to support professionals in interpreting and applying the principles of this code.



Licensing

There are certain things we must not license our brands for. This includes anything to do with children, anything that might encourage irresponsible drinking, confectionary or food products that appeal to anyone under-age, sexual or drug-related merchandise, or anything that might be considered a weapon.

All licensing arrangements must have prior approval from Edrington Legal and the Brand Director.

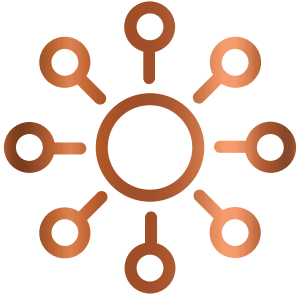


Compliance

All marketing on behalf of Edrington or our brands should comply with this Code. The brand director, senior regional leader, or any member of the board or executive team is responsible for ensuring compliance with this Code.

External agencies and Edrington's business partners should be supplied with the Code and be made aware of its principles and provisions.

In addition, we adhere to different codes around the world, including The Portman Group, OFCOM's rules of broadcast advertising, the European Forum for Responsible Drinking and DISCUS. Where a national code does not exist you should follow the principles of this Code as far as possible.



Marketing Code Committee

The Marketing Code Committee meets bi-annually to review materials issued in the previous year. In addition, they meet to review enquiries submitted to the committee.

The Marketing Code sub-committee should be used for guidance on major marketing campaigns and if you're unsure about social media content or brand comms.

Your first port of call is the sub-committee: marketingcode@edrington.com.

You should receive a response within five business days.

If you have any questions or concerns about how to use this Code, or wish to make a referral to the sub-committee, please contact the committee: marketingcode@edrington.com

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www.edrington.com

PLEASE ENJOY OUR BRANDS RESPONSIBLY