Policy on Commercial Communication

Updated: 31.08.2026

ASAHI EUROPE & INTERNATIONAL

Contents

Introduction 03

Section A: Code of Commercial Communication 04

Basic Principles 04
Preventing Underage Appeal 04
Responsible Drinking 05
Alcohol Content 05
Performance 05
Health Aspects 05
Violence and Anti-Social Behavior 05
Social/Sexual Success 05
Brand Promotions; Promotional and Display Items 05
Responsibility Message 06
Digital Media 06
Influencer Marketing 06
Direct Communication 06
Brand Names 07
Brand Sponsorship 07
Energy content 07

Section B: Oversight And Enforcement 08

Sales and Marketing Responsibility Committee 08
Sales and Marketing Personnel 08
Types of SMRC 08
Enforcement and Monitoring 08
Complaints 09
Education 09
Reporting 09

Annex I: Rules for Non-Alcoholic Beer Brands 10
Annex II: Rules for Craft Beers 13
Annex III: Five Safeguards for Digital Platforms 14
Annex IV: Checklist for Influencer Marketing Compliance 15

Introduction

Asahi Europe & International (AEI) believes strongly in our responsibility to be a force for good, both globally and 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 segments 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 **AEI Group Policy on Commercial Communication** (hereinafter referred to as 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, in order to support the improvement of standards across the industry. This Policy is also available at www.asahiinternational.com.

Sales and marketing personnel are essential to help protect our license to trade, which includes the marketing and promotion of our brands. This Policy applies to all commercial communication under the control of AEI companies either directly or through agents, partners, staff, etc.

Section A:

Code of Commercial Communication

The Code of Commercial Communication (hereinafter referred to as the "Code") provides AEI companies and their 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 and influencer marketing, digital media, the internet, text messaging, packaging and labeling, brand promotions, brand public relations activity, experiential marketing programs, 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 or indirectly, or is deliberately inspired by a brand.

Commercial communication does not include research (the 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 and 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, discriminatory, 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.

02 Global Codes

We respect global codes such as the International Chamber of Commerce (ICC)'s relevant codes of conduct and International Alliance for Responsible Drinking (IARD) Global Responsibility Standards.

Preventing Underage Appeal

03 Commercial communication may not be directed at persons under the legal drinking age (or, in countries without a legal drinking age, at persons under the age of 18).

04 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 their age 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 legal drinking age (or, in countries without a legal drinking age, over the age of 18) unpaid actors may be under the age of 25 but they must be above the legal drinking age.

05 All persons visible in user-generated content must be over the legal drinking age, 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 AEI companies, then clause 3 (above) applies.

06 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 legal drinking age (children and minors).

07 Commercial communication may only be placed in print, radio, television, 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 of legal drinking age (or, in countries without a legal drinking age, over 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.

08 All websites controlled (owned or managed) by AEI companies 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 legal drinking age (or, in countries without a legal drinking age, over the age of 18) enter the given website.

09 For all websites under the control of AEI companies, additional controls must be used. These 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 then having to re-enter their date of birth during the same session in order to gain entry to a website.
- **b.** Appropriate metadata to support content control software.
- **c.** Redirection to an appropriate social aspect website intended for underage people and for those who fail the age affirmation process.

10 Additional age affirmation prompts should be located within sections of the website where consumers can purchase merchandise.
11 Whenever content from AEI companies' 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 legal drinking age (or, in countries without a legal drinking age, over the age of 18).
12 In countries where technology is available to verify consumer data against government databases, AEI companies must consider implementing such technology.

Responsible Drinking

13 Commercial communication may not depict, promote or sponsor situations in which 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.
14 Commercial communication may never frame excessive drinking as positive, healthy, or normal behavior.
15 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.
16 Commercial communication may not present refusal, abstinence or moderate alcohol consumption in a negative light.
17 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

18 Commercial communication may not encourage selection 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

19 Commercial communication may not suggest physical prowess, power or strength as a result of consuming alcoholic beverages.
20 Commercial communication will only include alcohol consumption within safe environments. Anyone who is featured in commercial communication may not be shown consuming beer before or during any athletic event, or in other endeavors requiring exceptional physical ability, high degree of alertness, judgment, precision, or coordination (e.g. driving, motor activities, operating machinery, or other hazardous activities).

Health Aspects

21 Commercial communication may not depict or include pregnant women or promote consumption of alcohol during pregnancy.
22 Commercial communication may not claim that alcohol has curative qualities for mental and/or physical health, nor offer it expressly as a stimulant, sedative or tranquilizer, or as delivering energizing or stimulating effects.
23 Commercial communication will follow the serving size and drinking guidelines and display each person holding maximum one regular drink.

Violence and Anti-Social Behavior

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

Social / Sexual Success

25 Commercial communication may not imply that the consumption of alcoholic beverages is essential to business, academic, sporting or social success.
26 Commercial communication may not portray nudity or suggest that alcoholic 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.
27 Apparel should be appropriate to the overall context of the commercial communication.

Brand Promotions; Promotional and Display Items

28 No brand promotions may be directed at persons under the legal drinking age (or, in countries without a legal drinking age, to persons under the age of 18).
29 All promotions and promotional materials must follow cultural standards of good taste and not encourage irresponsible consumption of alcohol.
30 No games that require drinking alcohol as an element of the game are allowed.
31 Attendees should be encouraged to assume personal responsibility for their decision regarding whether or not to drink alcohol.
32 Alcoholic beverages must not be supplied to visibly intoxicated persons. Servers must be trained, preferably by means of a certified programme if available.
33 Water and soft drinks must be available wherever possible during the promotion.
34 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 legal drinking age (e.g. children's toys) or, in countries without a legal drinking age to persons under the age of 18.

Responsibility Message

35 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, page 35); see Annex 1 for further information.

36 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 (legal drinking age) only[1].
- **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.

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

- 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, legal drinking age, pregnancy).
    - The design of these icons may vary or be replaced with a written statement, subject to local regulations or consumer recognition.
- Any locally mandated responsibility message, where relevant.

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 Legal Drinking Age icon 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.

38 A responsibility message or icon should be included in all commercial communication (including downloadable and shareable assets, e.g., videos, photos, applications or user- or collaborator-generated content used or reused by or on behalf of AEI companies), except on permanent point-of sale items (e.g. glassware, neon signs, chairs) and 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

39 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 and distributed, the way they can be disposed of and the reduction in water and energy consumption waste or pollution which can be expected from using them.

40 Claims must be based on accurate information and then can be made in many ways, both express and implied, and include all types of claims, information, symbols, images, logos, graphics, colors 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 communication and the basis for their comparison must be clear.
- **f.** Green claims must fully comply with legislation and regulatorily required information.
- **g.** All sustainability communication should be backed by evidence data that has been audited/verified and/or a certification or partner that verifies that it 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

41 All content, including user-generated content, on digital platforms controlled (owned or managed) by AEI companies should be compliant with this Code. Content should be moderated on a regular and frequent basis.

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

43 All content generated in cooperation with, or deliberately inspired by, AEI companies presented on digital platforms managed by external entities and persons cooperating with AEI companies should be compliant with this Code.

44 All websites controlled by AEI companies must show a link to www.aboutalcohol.com or to the local version of that website.

45 AEI companies follow relevant digital media guidelines[2] ensuring people who appear on digital media, including influencers:

- Are over 25 of age, when utilizing platforms where age-affirmation mechanisms for influencers are not yet effective
- Partake in our and relevant local regulations trainings
- Follow Asahi Group's values and local regulations in their content and have mechanisms in place in case of failure of compliance.
- Display RDM (Responsible Drinking Messages), FAN (Forward Advice Notice) and UGC (User Generated Content) messages where relevant.
- Ensure all our pages are clearly identifiable as a business page e.g., by verification signs

Influencer Marketing

46 Content is classified as influencer marketing when the influencer has received compensation from a brand or when the brand has exercised editorial control[3] over the content. Compensation encompasses any form of consideration provided by a brand in recognition of the influencer's promotional activity, including but not limited to financial remuneration; free goods; sponsored travel or discount codes[4].

[1] Legal Drinking Age means the age of 18 years old or more
[2] Digital Guiding Principles and Influencers Guiding Principles
[3] Editorial control may range from tone and direction suggestions to pre-publication approval.

[4] see EASA Best Practice Recommendation on Influencer Marketing Guidance 2023, p. 10 for additional guidelines on editorial control and compensation

47 All influencer content associated with AEI companies must be clearly and immediately identifiable as marketing through transparent disclosure[5], for example, through platform-native labelling or hashtags such as “#ad” or “#sponsored”. They must also incorporate a responsibility message, such as “Don’t drink and drive” or “For people over the age of (legal drinking age) only”. Content must comply with local laws and with this Code

48 AEI companies apply the following standards to all paid, incentivized, and gifted influencer arrangements[6]. A compliance checklist is available in Annex IV.

- **a.** Influencers must be aged 25 or over on platforms where effective age-affirmation mechanisms are not in place and must primarily appeal to audiences above the legal purchase age.
- **b.** All influencers must be vetted prior to engagement to ensure no reputational association with harmful or irresponsible drinking, and to assess content ethics and suitability of audience
- **c.** A signed written agreement must be in place for all paid content, incorporating disclosure obligations, responsibility guidelines, applicable legal requirements, and best-practice tools for responsible posting on digital platforms. For gifted content, clear terms of engagement incorporating disclosure and responsibility requirements must be provided.
- **d.** All influencer posts must be actively monitored for compliance; non-compliant content must be corrected or removed within 72 hours of notification. Failure to address issues within this timeframe will result in reassessment of the relationship.
- **e.** Campaigns must be subject to regular audit to ensure ongoing adherence to these standards.

Direct Communication

49 AEI companies must receive specific consumer consent, including date-birth affirmation, prior to delivering one-to-one communication to consumers, excluding communication having the purpose of obtaining the consumer's consent. One-to-one communication may not be directed to persons under the legal drinking age (or, in countries without a legal drinking, age to persons under the age of 18).

50 AEI companies should provide a clear and transparent mechanism for consumers to opt out of receiving direct commercial communication.

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

Brand Names

52 Brand names and any corresponding packaging, labels and 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

53 For the purpose of the Code, brand sponsorship means any commercial agreement by which an AEI company contractually provides financing or other support in order to establish an association between the company’s brands and sponsorship property (e.g. sporting, music, community event) for the granting of certain agreed direct or indirect rights or benefits.

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

55 AEI companies 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 legal drinking age (or, in countries without a legal drinking age, over the age of 18).

56 AEI companies may not engage in sponsorship agreements unless the relevant Sales and Marketing Responsibility Committee approves the nature and elements of the sponsorship proposal.

57 This Code applies to the overall sponsorship agreement, including any sponsored event materials bearing company or brand logos, for the duration of the sponsorship agreement. Sponsorship items may not be of primary appeal to persons under the legal drinking age (e.g. children’s toys) or, in countries without a legal drinking age, to persons under the age of 18.

58 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

59 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, unless the law states otherwise.

[5] See specific guidelines in IARD Influencer Pledge and EASA Best Practice Recommendation on Influencer Marketing Guidance 2023, p 13 for additional guidelines on disclosure

[6] See more details in IARD Influencer Pledge and IARD Influencer Guiding Principles

Section B:

Oversight and Enforcement

This section of the Policy provides AEI companies with consistent, minimum standards for the oversight and enforcement of the Code of Commercial Communication ("the Code").

AEI believes in the self-regulation of our marketing activities, and of the industry as a whole. This is why we are committed to putting in place effective enforcement procedures in all 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 approval, 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

60 All AEI companies must have an internal Sales and Marketing Responsibility Committee (SMRC).
61 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.
62 There must be at least one employee from each of the Corporate Affairs and Legal Departments who participates in the SMRC. Corporate Affairs and Legal represent two mandatory votes within the SMRC voting process.
63 The Committee must include a sustainability expert who, in the role of special consultant, validates all sustainability-related communication on a mandatory basis.
64 Employees from other divisions may serve on the SMRC based on their overall reputation for good judgment, awareness of cultural diversity or relevant experience. Such employees represent optional votes within the SMRC voting process.
65 AEI companies are 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.
In the event that the SMRC is unable to reach a consensus on whether is 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 an agreement cannot be reached even after engaging the local Managing Director, the local SMRC can turn to the AEI SMRC for direction.

Types of SMRC

66 Within AEI there are more types of SMRC:

- Regional/HUB SMRC – is in charge with approving commercial communication when this targets two or more AEI markets. After Regional SMRC approval commercial communication will have to go through Business Unit or Local SMRC approval, too.
- Business Unit SMRC – is the SMRC covering a specific business unit which comprises more selling markets, ex. EMEEA
- Local SMRC – is the SMRC covering one market, or a group of countries considered one market, ex: Czechia & Slovakia, Poland, Hungary SMRCs

Sales and Marketing Personnel

67 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.
68 All such persons are expected to follow both the spirit and the letter of the Policy in their activities, to have regard for the intended audience's opinions on and understanding of the communication and the communication's impact on such audience, and for the broader cultural and societal context.
69 Marketing personnel should have available, at all the times, the login data for digital platforms owned or managed by the brand.
70 Artworks for primary and secondary packaging must be approved by the relevant SMRC in order to ensure the Responsibility Message is in place
71 Brand managers and/or local brand managers are responsible for including the Responsibility Message on the primary packaging (labels) and secondary packaging artwork, as well as for uploading them in the relevant SMRC (regional, business unit or local) for approval, as described below. Brand managers have to be consulted in all scenarios listed below:

a. For beverages produced by AEI locally to be commercialized on the local market – approval from local SMRC
b. For beverages produced by AEI in one market, to be exported in another selling market where exists a local SMRC – approval from local SMRC from the selling market
c. For beverages produced by AEI in one market to be exported in selling markets without local SMRC – approval from Business Unit SMRC where the selling market is located
d. For beverages produced outside AEI to be exported in selling markets with local SMRC or business unit SMRC – approval from the local SMRC from the selling market, or from the business unit SMRC where the selling market is located

Enforcement and Monitoring

72 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, labeling and packaging, brand promotions, brand public relations activities, experiential marketing programs, product placement, merchandising, point-of-sale materials, brand sponsorship, and category marketing.
73 If the commercial communication targets two or more AEI markets, it needs to be approved by the regional SMRC first.
74 Outcomes of the moderation process and actions taken in relation to user-generated content should be regularly reported to the SMRC.
75 The SMRC will ensure that the marketing or sales team is monitoring the latest available audience data for relevant outlets on an ongoing basis to ensure all AEI companies are meeting the 75% threshold using reasonably available data.
76 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.
77 All marketing contracts of AEI companies must include

a reference to the Code that requires them to abide by the Code in their activities.

Complaints

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

79 The complaints mechanism:

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

80 The complaints mechanism could be a recognised external mechanism that meets the requirements of the Code and that acts independently in reviewing complaints on behalf of an AEI company.

81 AEI companies are encouraged to make decisions arising from the complaint mechanism publicly available.

Education

82 New marketing and sales employees, agencies and influencers shall receive a copy of the Code as part of the induction program.

83 Influencers are required to participate in Asahi trainings as well as those on applicable local regulations

84 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

85 As a governance body that makes decisions on behalf of an AEI company, the SMRC shall report regularly to the local Executive Committee on its activities, including decisions arising from the complaint 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 this document, please contact your local SMRC.

✓ = the rule remains the 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 legal drinking age (LDA).	✓		
	Paid actors or models, must be over the age of 25 (the members of the promotion team must be at least 21 years old).	✓	✗	Paid actors, models and the promotion team must be older than the LDA and should reasonably look and behave in a way that is consistent with their age. The environment of commercial communication must be of an adult nature. When communicating stand-alone non-alcoholic flavored brands only, non-paid/paid actors may be younger than the LDA, but they must • be over the age of 13 • only appear in the background of the communication visual. • not consume the product being advertised. Such commercial communication using actors under the age of 18 must be mindful of sensitivities relating to local cultural values and market/public perception of the brand and approved by the SMRC.
	In a controlled environment, non-paid actors may be under the age of 25, but they must be above the LDA.	✓	✗	
	Commercial communication may not use cartoons, characters, etc. that are intended to have primary appeal to persons under the LDA.	✓		
	Commercial communication must comply with the 75:25 rule.	✓	✗	see below
	All websites must be controlled by an 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 situations where alcohol is being consumed rapidly, involuntarily or as 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 selection of a brand by emphasizing its higher alcohol strength or the intoxicating effect of alcohol generally.	*Not relevant.*		
PERFORMANCE	[*Not relevant]* Commercial communication may not suggest physical prowess, power or strength as a result of consuming alcoholic beverages.	*Not relevant.*		
	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.	*Not relevant.*		All nutritional and health claims must follow the regulatory approval process and be approved by the quality assurance and legal teams.
	Commercial communication may not suggest that alcoholic 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 alcoholic beverage consumption is essential to business, academic, sporting or social success.	*Not relevant.*		

AREA	CURRENT RULE	NON-ALCOHOLIC LINE EXTENSIONS OF ALCOHOLIC BRANDS	STAND-ALONE NAB BRANDS	EXPLANATION
BRAND PROMOTIONS	Commercial communication the may not be directed at persons under LDA.	✓	✗	see below
	No games that require drinking alcohol as an element of the game are allowed	*Not relevant.*		
	Water or soft drinks must be available during promotions.			
RESPONSIBILITY MESSAGE	The responsible drinking message must be included in all commercial communication.	The responsible drinking message is mandatory for primary and secondary packaging and for all commercial communication materials.	✗	The LDA warning logo (or written equivalent) and responsibility website must be displayed on primary and secondary packaging of non-alcoholic beers and similar brand extensions. It is not necessary for alcohol-free brands to include the icons representing the drink driving and pregnancy responsibility messages, but the option to include those remains.
DIRECT COMMUNICATION	Direct communication must be directed at persons above the LDA.	✓		
BRAND SPONSORSHIP	Brands may not engage in sponsorship agreements unless at least 75% of the audience comprises adults.	✓	✗	see below
	Brand sponsorships must be approved by the 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 permissible 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 LDA. If the rule 50:50 is to be applied, commercial communication shall not emphasize the beer aspect of the drink.
Sponsorship 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 the POCC. However, the exceptions below provide space for craft beer brands 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 overall capacity of less than 30 000 HL per year.

Exception to the rules concerning the Sales and Marketing Responsibility Committee

02 Commercial communication of craft breweries 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. These two representatives 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 forth in Section A, paragraph 51.
The usage is governed by the representatives of the Corporate Affairs and Legal Department, who also approve 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 that 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 case of any questions, get in touch with your local Sales and Marketing Responsibility Committee.

Annex III:

Five Safeguards for Digital Platforms

	GENERAL PRINCIPLES						
AGE-AFFIRMATION MECHANISM	Access to commercial alcohol communications should be restricted to adult consumers only.	• Select category: "Brewery" • settings → General Age restrictions "Alcohol-related ".	• Requested from your Account Manager.	• Requested from your Account Manager.	• Set at channel level and at video level.	• Composed of date of Birth and Country of residence, and might contain a "Remember me" disclaimer.	• Ideally at the pre-installation stage • or after the first-time login to app.
FORWARD ADVICE 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.	• In the "About" section • i.e. "Please only share our posts with those who are of legal drinking age".	• In the description • i.e. "Forward to those of legal drinking age only".	• In the description on the landing page • i.e. "Please do not share or forward to anyone underage".	• In the description of the channel and/or in the "About" section.	• Only required if the website does allow shareable/ forwardable content.	*Not relevant.*
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.	• Included at least once, in either the "About" section of the cover photo, with a link to the local RM website or about alcohol • i.e. "Drink <brand> in moderation".	• In the description with a link to the RM website • i.e."Please enjoy <brand> responsibly".	• Included at least once, in either the "About" section of the cover photo, with a link to the RM website	• Included at least once, in either the "About" section of the cover photo, with a link to the RM website	• It should be easily visible on the landing page, with a link to the RM website	• It should be easily visible in the main description of the app, at the pre-installation stage.
TRANSPARENCY / OFFICIAL SIGNPOST	Digital marketing activities shall be carried out in a transparent way in order to avoid misleading consumers about their commercial purpose.	• "Verification badge" from the Account Manager • or in the "About" section of the brand's official website.	• "Verification badge" from the Account Manager.	• "Verification badge" from the Account Manager	• Official signpost • or in the "About" 'section. "This is the official <include brand> channel".	• Made clear through the trademark, terms & conditions, official company information, etc.	• Logo / brand name / company / identification 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.	• In the "About" section as a link to a website with the policy in the "More Info" section; • or directly mentioned in the "Story" section.	• Through a self-evident web address leading to the UGC policy. Though non-clickable, it leads to a real website. • Or in a visible way on the brand's website, provided that in the profile bio it's stated that the UGC rules can be found there.	• In the description.	• In the "About" section:	• Only required if the website allows UGC.	*Not relevant.*

Annex IV:

Checklist to verify Influencer Marketing Compliance

AREA	CHECKLIST POINTS
SELECTION	☑ Require age-affirmation mechanisms on influencer posts where platform support exists. ☑ If platform age-gating is not effective/available, confirm paid influencers are ≥ 25 years old. ☑ Confirm influencer's audience primarily comprises persons above legal purchase age. ☑ Vet influencer reputation for any association with harmful alcohol use, as well as content ethics and suitability of audience ☑ Review influencer's past posts for content that condones irresponsible or illegal drinking; reject if non-compliant.
ENGAGEMENT	☑ Have a written, signed agreement for all paid influencer content. ☑ Include links/information on applicable national/regional legal requirements in the agreement. ☑ Require clear, conspicuous disclosure of the brand relationship in every paid post. ☑ Require influencer compliance with AEI Policy on commercial Communication ☑ Provide best-practice guidance on platform tools (branded content tags, age-restriction settings, etc.). ☑ Provide feedback and reporting channels for influencers to raise concerns about responsible drinking or campaign issues. ☑ For gifted-product content, supply written terms that require disclosure and adherence to the responsible marketing code.
MONITORING & ENFORCEMENT	☑ Monitor influencer posts for compliance throughout the campaign. ☑ Notify influencer of non-compliant posts immediately and require correction or removal within 72 hours. ☑ If influencer fails to remedy issues within 72 hours or repeatedly posts non-compliant material, document and reassess/terminate the relationship. ☑ Conduct regular audits of campaigns and influencer activity to ensure adherence to our code. ☑ Keep records of monitoring, notifications, corrections, and audits for accountability.