



**LUCOZADE RIBENA
SUNTORY**

October 2014

**LRS Responsible Marketing Code – to be published on www.lrsuntory.com
and provided to all employees and agencies for compliance.**

Responsible Marketing - Introduction

Lucozade Ribena Suntory (“**LRS**”) markets some of the nation’ s best-loved and most trusted soft drinks brands. We take the trust that consumers have in our brands very seriously and therefore we are committed to delivering the highest quality products and standards in everything we do.

This code has been created specifically for our UK business to both reflect and shape our marketing behaviours every day and ensure that responsible corporate citizenship is at the heart of everything we do.

In addition to compliance with local laws and regulations, we require our employees to adhere to this code which establishes principles and consistent standards for the marketing of our brands. We expect our partners, agencies and anyone acting on our behalf to adhere to the code.

We are committed to marketing our products responsibly, and to playing our part in helping consumers make informed choices in relation to their beverage consumption. With our choice of brands we aim to inspire consumers to lead active, imaginative and energetic lifestyles.

We adhere to the international standard for responsible marketing to children and as such do not advertise any products or target marketing communications to any children under 12 years of age.

We base such criteria on the following:

- Most academic reviews recognise that by the age of 12, children develop their behaviour as consumers, effectively recognise advertising and are able to adopt critical attitudes towards it.
- There is a strong degree of academic consensus that by the age of 12, children are fully capable of understanding the persuasive intent of advertising and have the necessary cognitive tools to critically assess it.
- There is insufficient evidence to suggest there is an influence of food advertising on purchase requests of children over 12 years.

Where local market regulations are stricter than the international recommended standard, the local regulations will take precedent.

We have committed not to directly market products categorised as high in fat, sugar and salt (“**HFSS**”) using the Food Standards Agency’ s Nutrient Profiling Scheme to consumers who are under the age of 16.

We regularly review all of our marketing communications to ensure they comply with these principles, and that they also comply with external self-regulatory codes and industry best practices.

We will continue to review this code to ensure we keep up to date with changes in the external environment, including but not limited to changes in marketing and commercial practices. We will also annually provide training for employees and agencies responsible for creating our marketing communications.

Scope

This code is to be applied to all local marketing communications generated by or on behalf of LRS in the UK.

Within this code, ‘marketing’ means product advertising and promotion in all media including, but not limited to, packaging, brand promotions, brand advertising, brand PR, product/prop placement, sponsorship and brand experiential marketing, packaging, point of sale material, digital, online and mobile marketing and direct marketing.

Basic principles

We commit that our marketing communications will:

Be legal, ethical, truthful and conform to accepted principles of good taste and decency, fair competition and good business practice.

Comply with all local legislative and regulatory requirements.

Be clearly distinguishable and transparent in its commercial nature.

Not use themes associated with aggression, anti-social behaviour or violence including sexual violence.

Not use derogatory, defamatory or offensive statements in particular in relation to race, gender, sexual orientation, religion or local cultural values.

Not condone or encourage poor nutritional habits or an unhealthy lifestyle.

Not promote irresponsible or excessive alcohol consumption.

Television Advertising

We will comply with all local laws, regulations and restrictions including the UK Code of Broadcast Advertising which restricts the advertising of HFSS products in or adjacent to programmes that are commissioned for, principally directed at or are likely to be of particular appeal to children up to 16 years of age.

We will not target our advertising and marketing to children under 12 and therefore we will not advertise any of our products on children’s TV channels or around children’s shows (which are principally directed at under 12s.)

Digital and direct communications

All content, including user generated content on LRS controlled digital platforms should be compliant with this code. Content is moderated on a regular basis.

Our pledge not to target our advertising and marketing to children under 12 and not to advertise or market HFSS products to children under 16 equally applies online. We acknowledge the challenges involved with this pledge in relation to digital platforms and we will continue to review our digital campaigns to assess how best to tackle those challenges.

We will comply with all data protection regulations and will provide clear and transparent mechanisms for consumers to opt-in to receive marketing communications.

We will protect the data of those participating in our marketing activity and will not pass this data onto third parties for marketing purposes, unless authorised to do so by the participant.

We will be transparent in our communications and ensure that all marketing communications will not claim or imply that the marketer is acting as a consumer or for purposes outside its trade, business, craft or profession.

Sponsorship

We will not sponsor events or celebrities that are likely to be of particular appeal to children under 12.

When selecting sponsorship partners and celebrities we are careful to ensure they have a relevant and identifiable fit with the product and they set a good example in terms of responsible consumption and lifestyle.

Any sponsorship which appeals to 12-16 year olds must encourage physical activity and promote a balanced and healthy lifestyle.

Any prop and product placement at sports and events must not be likely to be of particular appeal to under 12s. We will work with our external media agencies to ensure that any televised event featuring our product does not appear in children's programming.

Promotional Marketing

We will not directly target promotional offers or competitions at children aged under 12.

We will not use items that have particular appeal to children in our promotional offers (e.g. toys.)

Our marketing communications will not encourage consumers to over-consume HFSS categorised products or actively persuade them to make unbalanced nutritional choices.

Where available, we will always endeavour to include a zero/lower calorie alternative in our promotional offers.

We will endeavour to work with our customers to encourage them to offer consumers a broad choice of products that include smaller pack sizes and lower calorie options alongside our regular soft drinks.

We will encourage our customers to adhere to our marketing principles when using our drinks and brands in their own activity.

Commercial activity in schools - primary and secondary

Any product offered for sale in schools will be compliant with the local laws and regulations regarding permissible drink choices.

We will not directly supply vending machines to any primary schools.

We will not promote the consumption of our brands in a school setting.

We will not actively place any product branded point of sale (POS) material in schools.

This includes, but is not limited to, posters, free prize draw bins, banners, tent cards or flags.

On occasion, LRS may choose to partner with schools and other organisations for social marketing projects designed to get young people active and provide education about nutrition. In these instances, activity will not be product branded and will be designed to have a genuine and measurable impact which will only be agreed with school management and other organisations.

Consumer information

We will include nutritional and calorie content on all of our products and where appropriate include reference intakes based on a percentage of an adults daily guidelines.

We will include ingredient and serving size information clearly on pack as well as on brand and company websites to help consumers make informed choices.

We will include high caffeine content information on drinks where required.