

DIAGEO



Marketing
Code

GLOBAL POLICY

UPDATED JANUARY 2023

Promoting *Responsible Drinking*

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Introduction

We are incredibly proud of the role our brands play in society: they are iconic, relevant, and culturally present, they celebrate diversity and challenge prejudice; many have longlasting legacies, and others were born in more recent years.

Diageo has a proven history of ensuring our brands are advertised and marketed responsibly, and core to Diageo's 'Society 2030: Spirit of Progress' action plan, is Positive Drinking.

We want Diageo's marketing and promotional activities to be recognised as the best in the world, and we work to achieve this by upholding our responsible marketing principles, celebrating moderation, addressing alcohol-related harm and providing consumers with the information and tools they need to make responsible choices about drinking - or not drinking.

The Diageo Marketing Code (DMC) supports our marketers in growing our brands responsibly. It is our mandatory minimum marketing standard and, in many cases, goes beyond what is required by law for alcohol marketing. It governs how we, and any third parties we work with, must operate.

The Code applies across all our markets, and it guides every aspect of our activities from research and development to marketing, promotion, and packaging. At the heart of the Code is ensuring that all our marketing is only ever directed at adults over the legal purchase age, and to encourage drinking in moderation.

We consider the DMC to be an enabler of outstanding creativity and precision across all our marketing content and where it appears. We hope it inspires all our stakeholders to continue to work with us, to deliver responsible alcohol marketing and effective self-regulation across the industry and the world.

Above all, our desire is that the DMC will help us achieve our ambition to be one of the best performing, most trusted and respected consumer products companies in the world.

Cristina Diezhandino
Chief Marketing Officer

Scope

This Code applies to all activities intended to market our beverage brands.

This includes, but is not limited to:

- market research
- brand innovation and product development
- brand names and packaging
- trade advertising
- sales materials
- consumer advertising, brand-related media or communications, and relationship marketing
- digital, mobile and social media
- product placement and branded entertainment programmes
- brand sponsorships
- branded merchandise
- promotional activities in the on/off-trade
- experiential marketing and events
- cocktail names and drink recipes

The term 'marketing' is used throughout this Code to cover all these activities, and any other activity designed to market our beverage brands. This Code is not intended to apply to Diageo communications providing health and nutritional information about alcohol products on non-branded sites. This updated Code replaces all previous versions of the Diageo Marketing Code, with effect from January 2023. **Please refer to the Diageo Digital Code for further guidance regarding digital marketing and related technical requirements and safeguards.**

Scope: Which Sections Apply	Alcohol Products	Non-Alcoholic Beverages Trademark Extensions	Non-Alcoholic Beverages New To World (NTW)
1. Laws, Codes & Ethics	✓	✓	✓
2. Abstinence	✓	✓	✓
3. Adult Appeal	✓	✓	✓
4. Responsible Drinking	✓	✗	✗
5. Alcohol Content	✓	✗	✗
6. Health, Therapeutic, Performance Or Functional Benefit	✓	✗	✗
7. Social And Sexual Success	✓	✓	✓
8. Drink Driving And Other Potentially Dangerous Activities	✓	✗	✗
9. Anti Social Or Inappropriate Associations	✓	✓	✓
10. Good Taste And Decency	✓	✓	✓
11. Non-Alcoholic Beverages	✗	✓	✓

01 Laws, Codes and Ethics



Our marketing must:

- ✓ Conform to high standards of business ethics and commercial integrity.
- ✓ Comply with all applicable laws, regulation, industry codes and all other Diageo Policies.
- ✓ Seek to promote diversity and inclusion.

- This Code sets out global minimum standards that apply everywhere.
- Our marketing must comply with the letter and spirit of all applicable national laws, local regulations and self regulatory Codes of practice to which we are a signatory. Where local laws, regulations or Codes of practice impose additional or more stringent requirements, then those additional requirements must also be met.
- Our marketing must also comply with all other relevant Diageo Codes, policies and standards such as the Code of Business Conduct, the Digital Code, the Data Protection Global Policy, the Responsible Research Standard, and the Consumer Information Standard.

02 Abstinence



Our marketing must:

- ✓ Always show respect for those who choose to abstain from alcohol.

- We acknowledge that there are times in everyone's life when consuming alcohol may be unwise and that there are people who choose not to drink at all for a variety of reasons, including cultural and religious ones. We will always respect these individual choices and be aware of local values and sensitivities in this regard.
- We will not present abstinence from or moderation with alcohol in a negative manner, nor imply that it is wrong or foolish to refuse a drink, even in a humorous manner.

Promotions and events

- Our on/off-trade promotions will never pressure anyone to drink.

03 Adult Appeal



Our marketing must:

- ✓ Be aimed only at adults and never target those younger than the legal purchase age for alcohol.
 - ✓ Be designed and placed for an adult audience, and never be designed or constructed or placed in a way that appeals primarily to individuals younger than the legal purchase age for alcohol.
- While some countries have a legal purchase age for alcohol beverages that is younger than 18 or may set no legal purchase age limit at all, it is Diageo's policy never to target our marketing activities at people younger than the age of 18. In countries with a legal purchase age older than 18 (e.g. 21 years in the USA), we will never target our marketing activities to people younger than this age.
 - The term 'LPA' is used throughout this Code to mean the legal purchase age for alcohol or 18 where there is no LPA or where it is younger than 18.

Content

- a. Our marketing must never be designed or constructed in a way that appeals primarily to people younger than LPA.
 - i. 'Primary appeal' to persons younger than LPA may be judged as a special attractiveness to such persons above and beyond the general attractiveness it has for persons older than LPA.
- b. We will not use any image, symbol, language, gesture, music, cartoon character, person, sporting/entertainment celebrity, hero, or promotional prize or gift that appeals primarily to those younger than LPA.
- c. We will not license our brand names, logos, or trademarks for use on children's clothing, toys, games, games equipment, or other materials intended for use primarily by persons younger than LPA.
- d. We will not associate our brands with the attainment of, or 'rites of passage' to, adulthood.
- e. People appearing in our brand advertising must be over 25 years or older, and reasonably appear to be and be portrayed as 25 years or older. This also applies to non-alcoholic beverages (see section 11 for definition).
 - i. People who are aged, and reasonably appear to be, between LPA and 25 (and are portrayed as such) may be sponsored, and/or appear in PR, event and promotional materials, but not in advertising.

Placement

- f. We will place our marketing in communications media, events and third party websites only where a minimum 70% (75% for the UK & Ireland, and 71.6% for the US) of the audience can reasonably be expected to be older than LPA.
 - i. We will monitor the audience composition of media in which we advertise on a regular basis to ensure compliance to the highest practical level.
- g. We will take reasonable steps not to place advertising on any outdoor stationary location in close proximity to schools, except on licensed premises. Care must also be taken when considering locations in proximity to religious buildings or other locations that may be inappropriate given local sensitivities.
 - i. We will use a range of available technology to target adult audiences in all branded digital media and to prevent access to those younger than LPA. See the Diageo Digital Code for more guidance on age-targeting in digital media.
- h. Diageo-owned Responsibility websites may be exempted from the above obligation if permitted by local law, in view of the fact that the sole purpose of such digital resources is not to market alcohol brands, but to inform people on the facts about alcohol.
- i. Relationship marketing must not be sent to any individual younger than LPA.
- j. All content that is designed to be forwarded or shared by users should include a Forward Advice Notice (FAN) instructing recipients they should not forward the content to individuals younger than LPA.

Sponsorship

- k. Diageo brands must not be used to sponsor sports, celebrities or events that appeal primarily to people younger than LPA.

Promotions

- l. People involved in promotions for our brands in the on/off-trade must be LPA or older.
- m. Our on/off-trade promotions and events must never be designed or constructed in a way that appeals primarily to, or offers our brands to, individuals younger than LPA.

Research

- n. No market or consumer research may be commissioned or conducted by Diageo among people younger than LPA.

See the Diageo Responsible Research Standard for further guidance.

* In the United States, no advertising will be placed within 500 feet of an elementary or secondary school, or an established place of worship.

** In the United States, we will not market our brands on college and university campuses except in licensed establishments.

04 Responsible Drinking



Our marketing must:

- ✓ Depict and encourage only moderate and responsible drinking.
- ✓ Incorporate responsible drinking reminders and/or initiatives.
- ✓ Never depict, condone or encourage excessive or irresponsible drinking or refer in any favourable manner to the effects of intoxication.

- a. Marketing that depicts responsible drinking as a relaxed, sociable and enjoyable part of life has a role to play in promoting a responsible approach to drinking.
- b. We will not depict people drinking heavily or rapidly, or in a state of intoxication, nor imply that such behaviour is attractive or appropriate.
- c. We will not promote our brands with irresponsible cocktail names or excessive quantities of alcohol.

Promotions and events

- d. Our on/off-trade promotions will encourage responsible drinking for those adults who choose to drink, and will not support activities that encourage excessive drinking.
- e. We will not sponsor promotions involving drinking games that have speed incentives, or that require undue quantities of alcohol to be consumed.
- f. While there is nothing irresponsible about enjoying our brands neat, care needs to be taken in connection with the marketing and promotion of our brands as shots due to their potential to be consumed rapidly. A single shot may be enjoyed responsibly as part of an occasion, but we will not depict or encourage rapid or multiple shot consumption by individuals.
- g. We will not support or utilise promotional activities, packaging or drink delivery ideas that prevent consumers from understanding and controlling how much alcohol they are consuming.

Research

- h. Consumers in research will never be encouraged to drink excessive amounts, nor drink in an irresponsible way. If they are observed to drink in this manner, they will either be excluded from the research immediately or this part of the research will be stopped.

- i. Diageo will provide consumers in research situations with appropriate sources of information on responsible drinking (e.g. DRINKiQ.com).

See the Diageo Responsible Research Standard for further guidance.

Responsible drinking reminders and initiatives

Advertising

- j. Clearly evident Responsible Drinking Reminders (RDRs) are required in all above-the-line advertising for our alcohol brands. This includes television, cinema, radio, outdoor, digital, print and any other above-the-line advertising activity.
 - i. RDRs are encouraged for below-the-line marketing where appropriate.
- k. Alcohol brands may use 'Drink Responsibly', a tailored RDR unique to the brand or campaign or local market, or a combination of these. Tailored RDRs, or other website addresses as RDRs, must be cleared through Corporate Relations and Legal. Markets with government-mandated health messages and/or warnings should consult Corporate Relations to see if an additional RDR is warranted.
 - i. DrinkiQ.com should accompany the RDR where possible.
- l. The format of the RDR should be appropriate to the advertisement.
 - i. Television and cinema advertisements may include a clearly audible voice-over RDR, and/or a clearly visible RDR within the advertisement.
 - ii. Digital advertisements must use visual RDRs. Dynamic online banner ads that rotate through a series of 'frames' need only include the RDR in one of those frames.
- m. The size and placement of the RDR will depend on the piece of advertising and its location but must be clearly evident.
 - i. In printed and on-screen material, the RDR should be clearly distinct from the mandatory information required by regulations, and should not be placed in any area or in any manner that is not readily visible and readable to consumers i.e. messages should not be placed vertically (sideways) on a page or billboard, or in the seam of a magazine, etc.
- n. Every Diageo brand website must include on the footer of every page a link to Diageo's online responsible drinking resource, DRINKiQ.com

*In the United States, 20% of Diageo's broadcast advertising will focus exclusively on responsible drinking themes.

04 Responsible Drinking (cont.)

Sponsorships

- o. Appropriate responsible drinking reminders must be included in all sponsorship activities.
- p. Sport sponsorships must incorporate a prominent responsible drinking initiative.

Promotions and events

- q. Our promotions and events should incorporate responsible drinking reminders or initiatives.
- r. People involved in the promotion of our brands must be briefed about Diageo responsible drinking and promotions standards.

Labels

- s. Where legally permissible, all new back labels and secondary packaging must include at least one and up to three responsible drinking symbols, a reference to Diageo's online responsible drinking resource DRINKiQ.com, a list of allergens, alcohol content and recycling, and sustainability symbols.

See Diageo Consumer Information Standard for further guidance.

05 Alcohol Content



Our marketing must:

- ✓ Via packaging, websites, and other appropriate channels, provide clear, factual and neutral information about the alcohol content of our brands and drinks recipes.
- ✓ Never present high alcohol strength or potency as the dominant theme or principal basis of the appeal of any marketing or product innovation.
- ✓ Not imply that lower-strength alcohol beverages may be consumed in ways or situations that would be inappropriate with higher strength beverages.

- a. We will, where possible, provide factual and neutral alcohol content information on our packaging and via other channels such as websites (including DRINKiQ.com) and consumer care-lines.
- b. When promoting drink recipes, we will include specific liquid measures (e.g., '30ml' or equivalent local measurement rather than 'one part').
- c. If required by law, we will include the total alcohol content (in 'grams of alcohol' or locally recognised measure such as 'standard drinks'/'units'), expressed per serving.
- d. High alcohol strength or potency must never be the dominant theme or principal basis of the appeal of any marketing or product innovation.
- e. We will never imply that mid or lower strength beverages (see section 11 for guidance on No Alc beverages) may be consumed in quantities, ways or situations where higher strength beverages may be inappropriate, nor that mid or lower strength beverages are healthier or more responsible choices.

We will provide factual
and neutral *alcohol*
content information
on our packaging



06 Health, Therapeutic, Performance or Functional Benefits



Our marketing must:

- ✓ Not imply that our alcohol brands offer any health, therapeutic, functional or performance benefits.
- ✓ Not imply that alcohol is the catalyst for any change in mood or state, nor that it has any energy or endurance benefits.
- ✓ Not portray or target pregnant women with our alcohol products.

For guidance applicable to Non Alcoholic Beverages, see Section 11.

- a. We will where practicable and permitted by law, provide factual and neutral nutritional information about our products, via appropriate channels such as DRINKiQ.com.
- b. We will not imply that drinking alcohol leads to any health, dietary or functional benefits, nor that alcohol may play a role in managing weight or as part of a fitness regime, nor that consumers may consume low(er) calorie or carbohydrate beverages in excessive amounts.
- c. We will not imply that drinking alcohol enhances mental ability, performance, skills or strength.
- d. We will not promote any of our products as medicine, nor imply that alcohol has the ability to prevent, treat or cure any human disease or condition.
 - i. We will not use gifts, drinking vessels or cocktail names with medical or pharmaceutical connotations to market our brands.
- e. We will not market our alcohol brands to pregnant women nor portray pregnant women in our marketing.
- f. Our alcohol brands must avoid any appeal on the grounds of stated functional benefits (e.g. performance or therapeutic).
 - i. However, if using ingredients with such perceived qualities, we must only use sufficient quantities necessary for the purpose of delivering a specific flavour. On packaging and in promotional materials of such products we may reference such ingredients, but we may not make any claims (whether explicit or implied) that these ingredients confer any health or functional benefits.
 - ii. None of our products will claim sexual benefits, such as enhanced virility or sexual prowess.
- g. We will not market our alcohol brands as energy drinks, nor imply that consuming them (either alone or with a specific mixer) delivers energy or endurance benefits.

- i. We will not advertise or promote our alcohol brands in a way which implies that drinking alcohol will increase stamina, make the night last longer or give a boost, nor use suggestive drink names which imply energising, stimulating or invigorating properties.
 - ii. If co-promoting our alcohol brands with an energy drink mixer, the mixer must be treated in a neutral manner just like any other mixer, no energy claims may be made, and particular care must be taken with the imagery used.
- h. Our alcohol brands may be portrayed as the perfect choice for already energetic or relaxing occasions, but we will not imply that they are the catalyst for any change in energy, state of alertness or states of mental or physical relaxation.
 - i. We will not market our alcohol brands as thirst quenching, hydrating or refreshing, nor imply or suggest that they be consumed instead of non-alcoholic beverages.
 - j. Where legally permitted, claims about nutritional qualities, ingredients or specific production methods of our alcohol brands (for example sugar-free, dairy-free, organic) may be made if they are accurate, substantiated, and neutral in relation to health.

07 Social and Sexual Success



Our marketing must:

- ✓ Not portray or imply that drinking is necessary to obtain social or other success, nor to overcome inhibitions or to be socially accepted.
- ✓ Not portray or imply that drinking enhances sexual attractiveness or is a requirement for sexual success.

- a. Our brands may be portrayed as part of normal social experiences, such as the depiction of people who appear to be attractive or affluent, or people who appear to be relaxing or in an enjoyable setting. Brand preference may be portrayed as a mark of discernment or good taste.
- b. However, our marketing materials will not imply that drinking is necessary to obtain social, professional, educational, athletic, financial or other success, nor to solve social, personal, or physical problems, nor to overcome inhibitions, shyness or social barriers, or to be socially accepted.
- c. Our marketing may also portray our brands as part of a social or romantic setting, or people showing affection or other amorous gestures. However, we will ensure that our marketing does not imply that drinking enhances sexual attractiveness or is a requirement for sexual success. Implicit sexual activity, seduction scenarios, gender stereotyping and prizes or gifts that breach the spirit of these provisions must all be avoided.

08 Drink Driving and other Potentially Dangerous Activities



Our marketing must:

- ✓ Only portray drinking in safe and appropriate circumstances.
 - ✓ Never portray drinking before or whilst driving motor vehicles, operating machinery, or any other similar activity or situation.
- a. We will not depict drinking before or during activities, or in situations or locations, where drinking alcohol beverages would be unsafe or unwise.
 - b. In particular, our marketing must not imply that drinking alcohol is acceptable before or while operating machinery, driving a vehicle or undertaking any other occupation, endeavour, or sporting activity that requires a high degree of alertness or physical coordination in order to be carried out safely.
 - c. It is fine to show adults enjoying a drink after playing sports or after engaging in any occupation or endeavour referred to above, provided it is clear the activity will not be resumed.
 - d. This provision does not apply to non-alcoholic brands. For further detail see provision 11.

09 Anti-social or Inappropriate Associations



Our marketing must:

- ✓ Not portray or suggest any association with anti-social or illegal behaviour.
 - ✓ Not portray or suggest any association with violence.
 - ✓ Not portray or encourage the consumption of tobacco.
- a. Our marketing will not portray or suggest any association with anti-social behaviour, nor depict situations where beverage alcohol is being consumed illegally or in conjunction with explicit or implicit illegal activity of any kind.
 - b. We will ensure that our marketing does not portray or suggest any association with violence, including not trivialising problems associated with violence or glamorising violence.
 - c. We will not associate our brands with any activity or event where the intent is to cause harm or violence to anybody, including animals.

- d. We will not portray or encourage the consumption of any tobacco products (including e-cigarettes or other vaping products), nor brand or offer tobacco products or accessories as promotional gifts or prizes, nor sponsor tobacco-related events.
 - i. We will allow appropriate brand participation, such as sampling, at cigar-related venues and events, provided the brand participation is not linked to the purchase or consumption of tobacco products.
 - ii. We will not use our brands in any **joint marketing** activities, or in any consumer-facing promotions, involving tobacco products.
- e. Particular care and consideration of local sensitivities must be taken when assessing whether to associate our brands with gambling.

10 Good Taste and Decency



Our marketing must:

- ✓ Reflect generally accepted contemporary standards of good taste and decency.
 - ✓ Be judged from the perspective of the broader society - locally and globally.
 - ✓ Be sensitive to local and cultural variation.
- a. We must evaluate proposed marketing activities not solely from the perspective of the target audience, but from the perspective of the broader society - locally and globally - in which Diageo operates.
 - b. Our marketing must not employ themes that may seem harmless in one market but that may cause grave offence in another market or culture.
 - c. Our marketing activities must always be respectful of, and sensitive to, diversity of race, religion, colour, ethnicity, national origin, disability, sexual orientation or gender. Whenever possible, we will take action to actively promote diversity and inclusion and avoid inappropriate stereotypes.
 - i. **We have a zero-tolerance approach with respect to abuse and sexual harassment of Brand Promoters** i.e. employees and third-party agency staff who promote our brands in outlets, **as stated in Diageo's Brand Promoter Standard.**



Our marketing must:

- ✓ Only promote Non Alcoholic Brands to adults.
- ✓ Clearly distinguish non alcoholic variants of our brands from those containing alcohol, via packaging, labelling and brand communications.
- ✓ Differentiate and adhere to applicable guidance for Non Alcoholic Beverages that are a variant of an existing alcohol brand versus that for New-To-World brands.

Definitions

- a. This provision uses the following definitions:
- i. Non-Alcoholic Beverages (NABs) are generally those with an ABV (Alcohol by Volume) of 0.5% or lower.
 - Legal definitions of Alcohol-Free and similar descriptors may vary across countries. Brand teams are advised to always check with their Local Legal Counsel.
 - ii. New-To-World (NTW) products: Those NABs that are not a variant of an existing alcohol brand and that don't feature names or properties commonly associated with our alcohol brands.

Scope and key differences across product types

Please reference the scope table on p4 of this code clearly outlining which sections of the DMC do and do not apply to our non alcoholic products. The below table provides further clarification on the key differences in guidance with regards to our alcohol brands, our Non Alcoholic Beverages that are variants of an existing brand (No Alc trademark extensions) and our NTW No Alc brands.



Key differences		Alcohol Products	Non-Alcoholic Beverages Trademark Extensions	Non-Alcoholic Beverages New To World (NTW)
Health, Therapeutic, Performance Or Functional Benefit	Make claims about nutritional qualities, ingredients or specific production methods (e.g. sugar-free, dairy-free, organic) if they are factually correct, substantiated and legally permitted	✓	✓	✓
	Promote as a medicine, or imply that has the ability to prevent, treat or cure any disease/ condition	✗	✗	✗
	Claim sexual benefits, such as enhanced virility or sexual prowess	✗	✗	✗
	Refer to a brand as thirst quenching, hydrating or refreshing	✗	✓	✓
	Make claims about health, dietary or functional benefits linked to specific ingredients and to make these a dominant theme in marketing if they are factually correct, substantiated and legally permitted	✗	✗	✓
	Describe products as energy drinks, or that consuming them delivers energy or endurance benefits if such claims are factually correct, substantiated and legally permitted	✗	✗	✓
Pregnancy	Aim marketing at pregnant women (i.e. posting content targeted at them, sponsoring related events)	✗	✓	✓
	Portray pregnant women in our marketing (if No Alc nature of product is clear and prominent)	✗	✓	✓
Drink Driving	Present the product as a responsible choice for designated drivers	✗	✓	✓
Alcohol Content	Provide clear, factual and neutral information about the alcohol content of our brands and drinks recipes	✓	✗	✗
Responsible Drinking	Clearly display responsible drinking reminders in all ATL advertising	✓	✗	✗

Health and Functional Benefits for all NABs:

- a. We will where practicable and permitted by law, provide factual and neutral nutritional information about our products, via appropriate channels such as DRINKIQ.com.
- b. We will not promote any of our products as a medicine, nor imply that our products have the ability to prevent, treat or cure any human disease or condition.
 - i. We will not use gifts, drinking vessels or cocktail names with medical or pharmaceutical connotations to market our brands.
- c. Where legally permitted, claims about nutritional qualities, ingredients or specific production methods of our brands (for example sugar-free, dairy-free, organic) may be made if they are accurate, substantiated, and neutral in relation to health.
- d. None of our products will claim sexual benefits, such as enhanced virility or sexual prowess.
- e. All NABs may be marketed as thirst quenching, hydrating or refreshing.

For NABs that are NTW only:

- a. The following descriptions, attributes and/or claims can be made if factually correct, substantiated and legally permitted:
 - i. Statements about health, dietary or functional benefits linked to specific ingredients can be a dominant theme or a principal basis of appeal in marketing.
 - ii. Describing our products as energy drinks, or that consuming them (either alone or with a specific non-alcoholic mixer) delivers energy or endurance benefits.

For NABs that are variants of existing alcohol brands:

- a. Must avoid any appeal on the grounds of stated health, dietary or functional benefits (e.g. mental ability, performance, skills or strength), nor that they may play a role in managing weight or as part of a fitness regime.
 - i. However, if using ingredients with such perceived qualities, we must use only sufficient quantities necessary to deliver a specific flavour. On packaging and in promotional materials of such products we may reference such ingredients, but we may not make any claims (whether express or implied) that these ingredients confer any health or functional benefits.
- b. Must not be marketed as energy drinks, nor imply that consuming them (either alone or with a specific mixer) delivers energy or endurance benefits.
 - i. We will not advertise or promote these brands in a way which implies that drinking them will increase stamina, make the night last longer or give a boost, nor use suggestive drink names which imply energising, stimulating or invigorating properties.

- ii. If co-promoting with an energy drink mixer, the mixer must be treated in a neutral manner just like any other mixer, no energy claims may be made, and particular care must be taken with the imagery used.
- c. Our brands may be portrayed as the perfect choice for already energetic or relaxing occasions, but we will not imply that they are the catalyst for any change in energy, state of alertness or states of mental or physical relaxation.

Pregnancy

- a. The following guidance can be followed by all NABs as long as the non-alcoholic nature of the product is displayed in a clear and prominent manner:
 - i. Marketing can be aimed at pregnant women (i.e. posting content targeted at pregnant women in media, and sponsoring related events).
 - ii. Marketing can portray pregnant women and childcare related paraphernalia (i.e. cots, prams/strollers, children's toys).

Designated drivers

- a. Section 8 of this Code does not apply to NAB. We may present such beverages as a responsible choice for designated drivers, taking into account local laws and conditions.

Placement in store

- a. We will recommend to retailers that all NABs can be placed either in the alcohol beverage section of retail shops and/or in other areas that are principally targeted at those above the LPA, where permitted by law and taking into consideration rules under section 3 of this Code on Adult Appeal.



Responsible Drinking Initiatives

We work in a range of ways with many different stakeholders to promote responsible drinking and combat alcohol misuse such as drink-driving, excessive drinking, underage drinking and irresponsible serving of alcohol.

DRINKIQ.com is our online global resource that supports this work through the sharing of best-practice tools, information and initiatives.

We also encourage our in-market companies and global brand teams to develop and implement consumer initiatives designed to reduce alcohol related harm.

These initiatives are also subject to this Code. However, where these initiatives seek to portray the consequences of irresponsible or excessive drinking then, in consultation with Corporate Relations, the following Code provisions may be applied flexibly, only in the manner specified to the right, in order to ensure optimally effective consumer awareness initiatives:

- Provision 3 to allow people aged LPA+ to appear in corporate-branded responsible drinking advertising;
- Provision 3 on Adult Appeal to exempt unbranded Diageo owned websites such as DrinkIQ.com from the obligations to set an age affirmation mechanism, considering that the purpose of such resources is not to market alcohol brands but to educate and inform people on the facts about alcohol.
- Provision 4 to show the downside or consequences of excessive or irresponsible drinking;
- Provision 8 to show the downsides or consequences of drink driving or other similarly dangerous activities; and
- Provision 9 to show potential downsides or consequences associated with excessive drinking, such as violence, aggression or anti-social behaviour.

**We also encourage our
in-market companies
and global brand teams
to develop and implement
consumer initiatives designed
to reduce alcohol related harm.**

Marketing Code Compliance

Compliance with the marketing Code is mandatory for all employees of Diageo, our subsidiaries and joint ventures where Diageo has a controlling interest.

It also applies to third party agencies, contractors and consultants engaged by, representing or acting for (or on behalf of) Diageo, and our third party distributors who are responsible for or are involved in the marketing activities and marketing of our brands.

We must follow all provisions of this Code and should never cause, authorise or overlook breaches of the Code by others. Our in-market companies may strengthen this Code to address different or specific issues in their market.

These provisions must be in addition to, not in place of, the standards set out in this Code.

Responsibility

- All aspects of Code compliance are the fundamental responsibility of the general manager and marketing director in all our in-market companies, and global brand teams.
- Advertising, promotions and PR agencies, market research companies, media buyers, and all other external marketing suppliers, must receive a copy of the DMC and must undertake to abide by its provisions in any work they do on our behalf. The requirement to comply with the DMC must be included in the written terms and conditions of all marketing supplier contracts and in all activity/project briefs. Diageo project leaders are also responsible for briefing and guiding their suppliers and for ensuring they comply with the DMC throughout the term of the project.

Review and approvals

- Marketing directors are accountable for ensuring that their teams follow an effective DMC sign-off process to ensure that all materials released in their territory fully comply with the letter and spirit of the Code.
 - DMC review and sign-off must also be included at each key stage of the innovation process.
- Diageo's online approval tool, Diageo Content Hub, must be used to facilitate DMC review and archival of approvals wherever possible.
- If the evaluation of a DMC-related issue reaches a stalemate, the decision must be escalated in the following manner (depending where the stalemate originates):
 - In-market Marketing and Corporate Relations Directors, if not resolved then to
 - Global Marketing and Corporate Relations Directors.

If not resolved at this level, the Chief Marketing Officer makes the ultimate decision.

We must follow *all provisions of this Code* and should never *cause, authorise or overlook* breaches of the Code by others

Training

- f. Our in-market companies and global brand teams must establish regular training programmes for all those involved in Marketing, Trade Marketing, Consumer Planning, Innovation, Corporate Relations and for relevant members of the Sales teams (Sales Directors as a minimum).
- g. Newly recruited staff should receive DMC training as part of their induction, and regular, in-depth refresher training must be provided for all relevant staff (every 12-24 months).
- h. DMC training should be offered to support supplier, agency, third party and distributor compliance where appropriate.

Controls

- i. DMC sign-off and compliance processes must be formally reviewed on an annual basis in every in-market company and global brand team.
- j. In case of a breach, an additional review should be undertaken immediately. Questions on interpretation or application of the DMC should initially be addressed to the in-market Corporate Relations and Marketing Directors. These can be further escalated to Global Corporate Relations and the Chief Marketing Officer if necessary.
- k. Any criticism of Diageo's marketing activities should be reported immediately to the in-market Corporate Relations and Marketing Directors, and the Global Head of Responsible Marketing and Innovation, in order to review the material in question, take remedial action if necessary, and ensure our commitment to responsible marketing and effective self-regulation is maintained.
- l. Any breach of the DMC is also considered to be a breach of the Code of Business Conduct and should be reported promptly through the routes described in the Code.
- m. Any material suspected to be in breach of the DMC will be reviewed and any breaches will be dealt with in accordance with the Diageo internal investigation policy and local disciplinary policies, as permitted by law.
- n. Diageo employees can also raise concerns with their line manager, local Controls, Compliance & Ethics Manager, Global Risk & Compliance, or make a confidential report using SpeakUp.



For further information on the Diageo Marketing Code or compliance issues, contact the in-market Diageo Corporate Relations team. Advice is also available from:

Head of Responsible Marketing (Global)
Diageo 1HQ
16 Great Marlborough Street
London W1F 7HS
United Kingdom

Email: marketing.code@diageo.com

Copies of the Code, and further information can also be found at www.DRINKiQ.com

For the USA:

Diageo Corporate Relations
600 Pennsylvania Avenue, SE, Suite 304
Washington, DC 20003
Tel: 202 715 1105
Fax: 202 715 1114

For information about the Distilled Spirits Council of the United States (DISCUS), its Code of Responsible Practices for Beverage Alcohol Advertising and Marketing and its complaint procedure, visit:

www.distilledspirits.org