



The South African Breweries Pty Ltd Code of Commercial Communication

Although alcohol advertising is among the most widely regulated advertising in the world, we recognise that being a responsible alcohol advertiser often requires going beyond legal compliance. In addition to compliance with local laws and regulations, we require our people to adhere to the Code of Commercial Communication ("COCC"), which establishes consistent standards for the marketing of our brands.

We further encourage the adoption of and adherence to other relevant self-regulatory codes in the markets where we do business to ensure our advertising respects local cultural values.

Every person holding sales or marketing responsibilities is accountable for knowing and following the various policies (for example, the COCC and the Market Research Policy). Sales and marketing employees play a vital role in helping to protect our license to trade, which includes the marketing and promotion of our brands.

The object of the COCC is to provide SAB Limited with consistent, minimum content and placement standards for commercial communication.

The COCC does not cover commercial communications of non-alcoholic beverages except where non-alcoholic beverages have the same brand name as of the alcoholic beverage. Commercial communication does not include corporate brand and activities, research (the Market Research Policy applies), communication devoted exclusively to Sustainable Development, the prevention of irresponsible consumption of alcohol, press releases, corporate communications, or statements to the media or government.

The COCC applies to all SAB Pty Ltd sales and marketing communication, irrespective of where it originates.

BASIC PRINCIPLES

Commercial communication must:

- ✓ Be legal, decent, honest, truthful 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 or otherwise impugn human dignity or integrity.
- ✓ Be mindful of sensitivities relating to local cultural values, gender, race, sexual orientation and religion.
- ✓ Not employ themes, images, symbols or figures which are likely to be considered illegal, offensive, derogatory, demeaning or disparaging

Commercial communication refers to:

- ❖ Product (brand) advertising in all media - including but not limited to television, cinema, radio, outdoor and brand assets
- ❖ Product packaging
- ❖ Brand promotions
- ❖ Product placement
- ❖ Merchandising
- ❖ Product brand sponsorship
- ❖ Brand Names
- ❖ Digital communications & websites

POLICY AREAS

1. Preventing Underage Appeal

- 1.1. Commercial communication may not be directed at persons under the legal drinking age (18 years).
- 1.2. Paid actors or models in commercial communication (excluding promotions as detailed in clause 8) must be and look at least 25 years or older.
- 1.3. Commercial communication may not employ cartoons (either real or fictional), characters, icons, or other elements which are intended to, or do, have unique

appeal to persons under the legal drinking age. All artists must be over the legal drinking age and have a verifiable audience of over 70% over 18 years of age.

- 1.4. Commercial communications may only be placed in print, radio, television and/or digital media where at least 70% of the audience is reasonably expected to be part of a legal drinking age (18+) A placement will be considered reasonable if the audience composition data reviewed prior to the placement satisfied the placement criteria and was the best available data for that medium at that time.
- 1.5. In a controlled environment, where an age-affirmation mechanism is used to ensure the user/viewer is over 18 years of age non-paid actors may be younger than 25 years but they must be above the legal drinking age.
- 1.6. 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 SAB Pty Ltd then clause 3(above) applies

2. Responsible Drinking

- 2.1 Commercial communication may not depict, promote or sponsor situations where alcohol is being consumed rapidly, in large quantities, involuntarily, as part of a drinking game, or as a result of a dare.
- 2.2 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.
- 2.3 Commercial communication may not present refusal, abstinence or moderate consumption in a negative light.
- 2.4 Commercial communication may not depict or suggest alcohol consumption before or during activities which, for safety reasons, require a high degree of alertness, judgement, precision or coordination.
(Driving, operating machinery, sporting activities)
- 2.5 Commercial communication may not depict or suggest alcohol consumption during working hours at the workplace except when presenting taste testers or members of taste panels.

3. Alcohol Content

- 3.1 Commercial communication may not encourage choice of a brand by emphasising its higher alcohol strength or the intoxicating effects of alcohol generally. Factual information regarding a brand's alcohol content is acceptable on product labels where permitted by law.

4. Performance

- 4.1 Commercial communication may not suggest physical prowess, power, or strength as a result of consuming alcohol beverages. Athletes and actors may not be shown consuming beer before or during any athletic event or other endeavour requiring exceptional physical ability, power or strength. General sports sponsorships that feature brand logos are acceptable so long there is no suggestion that alcohol consumption contributes to athletic success.

5. Health Aspects

- 5.1 Commercial communication may not depict or include pregnant women or promote consumption of alcohol during pregnancy.
- 5.2 Commercial communication may not claim that alcohol has curative qualities, nor offer it expressly as a stimulant, sedative, or tranquiliser.
- 5.3 Commercial communication may not suggest that alcohol beverage should be consumed for potential net health benefits. Commercial communication may include factual information such as calorie or carbohydrate content so long as it is not linked to health benefits claims. Other evidence-based nutrition information approved by Global Alcohol Team and Legal is also permissible.

6. Violence and Anti-Social Behaviour

- 6.1 Commercial communication may not have an association with violent, risky or anti-social imagery or behaviour, or with illicit drugs or drug culture.

7. Social/Sexual Success

- 7.1 Commercial communication may not imply that alcohol beverage consumption is essential to business, academic, sporting or social success.
- 7.2 Commercial communication may not portray nudity or suggest that alcohol beverages can contribute directly or indirectly to sexual success or seduction. Models may not be posed in a position or stance that is overtly sexual in nature.
- 7.3 Apparel should be appropriate to the overall context of the commercial communication.

8. Product Brand Promotions; Promotional and Display Items

- 8.1 Paid contractors in consumer engagement promotions or activations must be and look at least 21 years or older.
- 8.2 Consumer engagement and/or brand promotions or activations must only ever be targeted to consumers over the legal drinking age.
- 8.3 Promoters may not consume any alcohol while executing a promotion.
- 8.4 Waitron promotions should not encourage irresponsible consumption of alcohol.
- 8.5 Promoter outfits should be appropriate for the occasion.
- 8.6 All product brand promotions and promotional materials must follow cultural standards of good taste, and not encourage irresponsible consumption of alcohol. No drinking games shall be conducted as part of a promotion. Attendees should be encouraged to assume personal responsibility for their decision to drink alcohol.
- 8.7 Alcohol beverages may not be supplied to visibly intoxicated persons. Servers must be trained, preferably with a certified programme, if available. Water and soft drinks must be available. Food is recommended.
- 8.8 All product brand promotion materials with brand logos must comply with all the provisions of the COCC. Promotional items will not be of primary appeal to persons under the legal drinking age (for example, children's toys and games) or in countries without legal drinking age, to persons under the age of 18.
- 8.9 Retail displays may not be merchandised with items that are intended to have unique appeal to underage persons.

9. Responsibility Message

- 9.1 All commercial communication, whether in visual, audio or digital form, must include a clearly visible responsibility message stating:

'Enjoy Responsibly. Not for Sale to Persons Under the Age of 18'.

Where the effect of including the **'Enjoy Responsibly'** would be to diminish the impact of the message overall, it can be dropped.

- 9.2 Motor vehicles used for any commercial communication must a clearly visible responsibility message stating:

“Be responsible. Don’t drink and drive.”

- 9.3 With respect to packaging, the responsibility message and details of how to access www.talkingalcohol.com, or the local version of that website, must occur at the first available package change-over in the ordinary course of business, but no longer than 2 years after adoption of this Policy. The responsibility message on product labels should read:

‘Not for Sale to Persons Under the Age of 18’.

- 9.4 A responsibility message or icon should be included in all commercial communication (including downloadable and shareable assets for example videos, photos, applications or consumer generated content reused by or on behalf of SAB Pty Ltd), except on permanent point-of-sale (e.g. glassware, neon signs, chairs), 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.

10. Digital principles

The SABMiller Social Media Policy establishes three principles that underpin all of SABMiller’s online activity – ***responsibility, transparency and respect***.

- 10.1 All digital communications must be conducted in an honest and transparent manner.
- 10.2 Branded content should be placed overtly on behalf of the brand and the commercial nature of communication must remain apparent even when using elements of user generated content.
- 10.3 Neither our employees, nor agencies working on our behalf should fabricate consumer comments beneficial to the brand or derogatory of others – in some countries this practice is covered by local legislation.
- 10.4 SAB Pty Ltd brands digital commercial communication must respect consumers’ privacy and comply with rules on the use of consumer data for marketing.
- 10.5 Clear data privacy statements and ‘House Rules’ must be provided. When collecting data for relationship marketing purposes, SAB Pty Ltd representative must inform consumers how the data will be used and provide the option to opt out of data processing.
- 10.6 Anyone engaging in digital commercial communication on behalf of a brand must have received training on the Policy on Commercial Communication

(e.g. the AiQ training programme) and must undertake annual refresher training (as set out in the COCC). These individuals should also be familiar with the latest versions of the SABMiller Social Media Policy, and digital communication guidance notes.

- 10.7 Agencies should only use named individuals on SAB Pty Ltd brand accounts, and these individuals must be trained (as described above) before engaging on behalf of the brand. The SAB Pty Ltd brand manager must be made aware of any changes to personnel working on the account.

11. Direct Communication

- 11.1 SAB Pty Ltd must receive specific consumer consent, including exact date of birth affirmation, prior to delivering one-to-one communications to consumers excluding the communication to obtain consumer permission itself. 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).
- 11.2 SAB Pty Ltd should provide clear and transparent mechanism for consumers to opt-out of receiving direct commercial communications.
- 11.3 All direct commercial communications and data management processes should comply with the ***Consumer Data Policy***.

12 Brand Names

- 12.1 Brand names and any corresponding packaging, labels, product names and internet domain names should convey quality products by not using disparaging colloquial names (for example, "alcopops"), conveying sexual innuendo, or using terms typically associated with intoxication or irresponsible consumption.

13 Product Brand Sponsorship

Product Brand Sponsorship (including sport, music, events etc.) for the purpose of this COCC means any commercial agreement by which a sponsor contractually provides financing or other support in order to establish an association between the sponsor's brands and a sponsorship property for the granting of certain agreed direct or indirect benefits.

- 13.1 SAB Limited should not engage in sponsorship agreements unless at least 70% of the audience for the event (meaning those attending the event and the audience for broadcast media coverage of the event) are reasonably expected to be over the legal drinking age (18+).

- 13.2 Where demographic data is lacking (for example, for a sponsored art gallery event), SAB Pty Ltd should seek alternative sources to determine what the demographics might be, such as:
- a) Does the artist/performer have primary appeal to an adult audience? What evidence is there of this?
 - b) Is 70% of the audience reasonably expected to be of legal drinking age and above? What measures are in place to ensure this?
 - c) Talk to the event organiser.
 - d) Use historical data to analyse and create a profile of the work/music/performance.
 - e) Look to demographics for comparable events.
- 13.3 The COCC applies to the overall sponsorship agreement, including any sponsored event material carrying the company or brand logos for the duration of the sponsorship agreement. Sponsorship materials and items will not be of primary appeal to persons under the legal drinking age, that is, persons under 18 years of age. (for example, children's toys, children's sport clothing)
- 13.4 General sport or music sponsorships featuring product brand logos are acceptable as long as there is no suggestion in the commercial communication that alcohol consumption contributes to athletic or musical success.
- 13.5 Sponsorship by alcohol product brands of sport or sporting teams with players under the legal drinking age is not allowed. Sponsorship of sports development programmes using the corporate brand is allowed.
- 13.6 No sportsmen, sportswomen or ex-sportsmen or women are permitted to be portrayed drinking alcohol beverages in advertisements.
- 13.7 Alcohol product brands may not associate with or sponsor "intentional fighting sports" (for example, boxing, cage fighting, wrestling).
- 13.8 All association with or sponsorship of any motorsports needs prior approval before proceeding. Risky driving styles are not permitted. In addition, any usage of cars in brand advertising or promotions needs specific approval before proceeding to ensure no linkage between drunken driving or risky driving with our brands.

14 Energy drinks and energising qualities

- 14.1 SABMiller Group companies commit not to produce any beverage alcohol products that contain excessive amounts of added stimulants, such as caffeine, guarana and taurine.

- 14.2 SAB Pty Ltd will not market or promote any alcohol beverage product or promote any alcohol beverage as delivering energising or stimulating effects.

MEDIA POLICY

15 Television:

The following rules apply to advertisements in the television medium:

- 15.1 Programmes with a verifiable 30% or more viewership of persons under the age of 18 may not contain alcohol beverage advertisements.
- 15.2 Alcohol beverage advertisements may not be flighted between 14h00 and 17h00 on Monday to Friday.
- 15.3 Alcohol beverage advertisements may not be flighted before 12h00 on Saturday and Sunday.
- 15.4 In the case of sporting events where the main sponsor is an alcohol beverage company, the 70/30 rule outlined in "15.1" above will still apply for the flighting of alcohol beverage advertisements.
- 15.5 All alcohol beverage advertisements on television will contain the message:

'Enjoy Responsibly. Not for Sale to Persons Under the Age of 18'.

The minimum specifications for this message are:

- a) The message should represent 10% of the title safe area, which should be a white block with black rule at the top.
- b) The message should run for the whole duration of the advertisement as one unbroken line.
- c) This pertains to all product brand advertisements or co-branded advertisements where the SAB product brand is the primary sponsor.

16 Radio:

The following rules apply to advertisements in the radio medium:

- 16.1 For alcohol advertisements on radio, the 70/30 rule will apply for audiences of 20 years and above, and an 80/20 rule would be applied in the case of audiences between 16 and 20 years.
- 16.2 No alcohol advertisements will be broadcast between 06h00 and 09h00, and between 14h00 and 17h00, Mondays to Fridays and between 06h00 and 12h00 on weekends.

- 16.3 In addition to the rules above, airings must take into account the programme's appeal to youth based on verifiable profile data, the programme presenter's profile and the profile of the audience call-ins.
- 16.4 All advertisements on radio will contain the message:

'Enjoy Responsibly. Not for Sale to Persons Under the Age of 18'.

The minimum specifications for this message are:

- a) The message must be a minimum of 5 seconds integrated into the creative message at the end of the advertisement.
- b) The message should be clear, audible and unrushed.
- c) The message should be separate and not part of the creative execution to ensure that the creative execution does not detract from the message.
- d) The message must be in the same language as the main advertising message.
- e) The temperament of the voice used for the message must be different from that employed in the advertisement.

This pertains to all product brand advertisements or co-branded advertisements where the SAB product brand is the primary sponsor.

17 Cinema:

In addition to clauses 15 and 16 above, the following rules apply to advertisements in the cinema medium.

- 17.1 The 70/30 rule will apply and the ARA members will ensure that compliance with this rule is achieved through contractual arrangements between members and cinema owners.
- 17.2 Cinema advertisement selling companies will be required to submit film titles and classification guide to the ARA with a qualitative assessment of the audience profile in terms of the 70/30 rule.
- 17.3 All alcohol beverage advertisements in the cinema will contain the message:

'Enjoy Responsibly. Not for Sale to Persons Under the Age of 18'.

The minimum specifications for this message are:

**Apply same as for Television,
see media policy point 14 a to c.**

18 Print:

In addition to section 15 and 16 above, the following rules apply to advertisements in the print medium.

- 18.1 The 70/30 rule will apply for audiences of 20 years and older and the 80/20 rule will apply for audiences between 16 and 20 years older.
- 18.2 All advertisements in print will contain the message:

'Enjoy Responsibly. Not for Sale to Persons Under the Age of 18'.

The specifications for this message are:

- a) The message should represent 10% of the title safe area, which should be a white block with black rule at the top.
- b) In case of double spread, the message should be repeated on every page.
- c) This pertains to all product brand advertisements or co-branded advertisements.

19 Outdoor:

As viewership age profiles are not available for this medium, the following rules will apply to achieve the objectives of the ARA commercial communication rules.

- 19.1 No billboards advertising an alcohol beverage brand or product will be placed within 200 meters by line of sight of schools, community centres and religious buildings (Churches, mosques, synagogues etc.)
- 19.2 In the case of building wraps and billboards larger than Super 96 size, no alcohol beverage advertisement will be placed within 500 meters by line of sight of schools, community centres and churches.
- 19.3 All alcohol beverage advertisements in the outdoor media will contain the message:

"Enjoy Responsibly. Not for Sale to Persons Under the Age of 18" or "Be Responsible. Don't Drink and Drive".

The message should be alternated on a 50/50 basis.

The minimum specifications for this message are:

- a) The message should represent 10% of the title safe area, which should be a white block with black rule at the top.
- b) In case of building wraps, the message should be repeated for every 20 meters of the wrap length and wrap face.
- c) This pertains to all product brand advertisements or co-branded advertisements.

20 Advertorials:

20.1 All advertorials to carry the age line as specified for print.

21 Digital communication:

21.1 Digital Communication **Access** - Limiting access to legal drinking age consumers

- a) Access to all SABMiller Group company-owned and managed platforms, including brand websites and social media profiles, must be controlled to prevent those below the Legal Drinking Age (LDA), or under the age of 18, from accessing the site or platform.
- b) Access must be controlled through either an age gate process or registration process, whichever is applicable. An age gate process requires users to enter exact date of birth details including the day, month, year (and country) A registration process requires users to supply exact date of birth information, and then 'log in' on future visits. Access can also be controlled through logging in process which relies on a user's social media profile e.g. through an API, such as Facebook Connect.
- c) If government databases, enabling the verification of age data exist, companies must consider using this technology to validate information provided.
- d) If it is not possible to control entry via an age verification process or through access controls (including age-gates, registration, social media profiles etc.) the channel must not be used for commercial communication.
- e) Those failing an age verification process must be redirected to an appropriate local social aspect website intended for underage people such as www.youdecide.org.za
- f) Age verification software should place a cookie (small piece of code) on a user's computer to prevent him/ her from leaving a site and re-entering their date of birth during the same session in order to gain entry to a site.
- g) An age verification process may provide a 'remember me' option. This allows users to tick a box, which will enable him/her to return to the site again without having to re-enter his/her date of birth. If this option is provided, it must be accompanied by a warning statement e.g. 'Remember my details. Do not select on shared computers.'
- h) Brand/company owned websites should include appropriate structural metadata to support content-control software.

- i) Additional age verification prompts should be located within sections of the website where consumers can purchase merchandise or use downloads, send-a friend, e-card or other tools.
- j) Additional messaging should be included as appropriate. For example, if an e-card may be sent to a third party, a clear reminder must be included stating that the recipient must also be above the legal drinking age (18+).
- k) Facebook: Fan pages must be restricted to persons over the age of 18 by setting the page admin section. Brands are only allowed Fan pages: not Profile or Group pages.

21.2 Digital Communication **Applications**

- a) Mobile applications can be downloaded from a number of different locations (e.g. Apple's App Store) and there is no means of introducing an age gate to ensure that users downloading apps are of LDA. Therefore, all downloadable applications must require verification of legal drinking age (via provision of full date of birth or "Yes" or "No" option) on first launch of the application. No subsequent age verification prompt is required.
- b) Those failing the age verification process must be redirected to www.youdecide.org.za, the website intended for underage people as described above. If the app is offline, a dedicated page should appear explaining why access has been denied and providing links to a relevant social aspect website.

21.3 Digital communication **Content** - Ensuring content is appropriate

- a) Concepts, structures, main feature and static content (including text and illustrations) of our digitally enabled campaigns (excluding user-generated content) must be approved by the Sales and Marketing Compliance Committee (SMCC) prior to launch/activation

21.4 Digital communication **Approvals**

- b) Planned proactive content and model responses to anticipated user comments must also be pre-approved by the SMCC.
- c) Where a need, or opportunity to post a message or other content requires a quick response, digital agencies and brand teams may post content without SMCC approval, but only if the responsible individual has been trained on the COCC (e.g. via the AiQ programme), the content clearly raises no legal issues, and does not contravene the requirements of the COCC.

- d) Procedures for moderating digital channels as part of the brands digital strategy must be presented to the SMCC for approval prior to launch. These should include: roles and responsibilities, actions and resources to be used. It should also include an escalation process.

21.5 Digital communication **House rules**

- a) 'House Rules' must be published as rules of engagement for platforms through which users can publish content. This may include brand websites that enable comments to be posted, or social media platforms such as Facebook.
- b) They must cover all legal requirements, the relevant aspects of the COCC and must state that any content that is non-compliant with the SAB COCC, a third parties platform rules, or any relevant laws, will be removed.
- c) 'House Rules' may be distinct from, or included within, a website's privacy policy and terms and conditions. The Alcohol Policy department can provide a template set of 'House Rules'

21.6 Digital communication **Moderation**

- a) Moderation activity may be managed internally or through an external agency after completion of COCC-related training (AiQ). Refresher training must also be taken on an annual basis.
- b) All user-generated content placed on SABMiller Group companies websites and social media pages must be reviewed for compliance with the COCC and the 'House Rules'.
- c) Where possible this should be in advance of it being published. This may be via workflows that require content to be approved before it is published, or filters set up to quarantine posts containing key words that can then be reviewed before publication.
- d) Where pre-moderation is not possible - for example for comments to a Facebook wall - content should be moderated after it has been published. In this case the site must be reviewed at least twice per day, and automatic feeds may be set up to alert the agency or brand team of any new posts in real-time.
- e) This should be supported by additional checks and balances. For example, a mechanism may be provided for users to report inappropriate content and/or behaviour to the site administrator.

21.7 Digital communication **Removal of content**

- a) Any content in contravention of the COCC and 'House Rules' must be promptly removed from the site. This includes any comment, photo or video that is posted to social media sites such as Facebook, and YouTube.
- b) If following moderation a comment is removed, or not posted, the site administrator should consider adding a comment to state that 'The administrator has removed a post as it contravenes our House Rules' or similar.
- c) A comment should not be automatically removed simply because it is critical of our business or brands – it may be more powerful to respond to a criticism or to leave it and monitor, since it may be countered by other contributors.
- d) Outcomes of the moderation process and actions taken in relation to user generated content must be reported to the SMCC regularly.

21.8 Digital communication **Images**

- a) Anyone featured in commercial communication created by a brand/ company to a brand website or social media platform should be at least 25 years old and reasonably appear to be at least 21 years of age. (Any promotions images must be at least 21 years of age.)
- b) User-generated content posted to our brand social media channels or websites may include images of people under the age of 25. In no case should anyone who is, or who appears to be under the legal drinking age (18) be shown in user generated content unless it is in an incidental context and there is no suggestion that they are alcohol consumers (e.g. a family photograph).
- c) If user generated content is to be reused by the brand/company, permission must be granted by the owner and people featured in the image must not be under the age of 25.

21.9 Digital communication **Automatic feeds**

- a) You must exercise additional caution when establishing a feed direct from another location, for example through a YouTube API, an RSS feed or similar – particularly if you do not have control over the original source.
- b) Appropriate care must be taken to assure that the content being sourced will also comply with the requirements of the COCC. The brand team should also establish whether more frequent monitoring is required, and

the steps to be taken in the case of inappropriate content being 'fed' to a SAB business brand page.

- c) The procedures for selecting and monitoring automatic feeds must be presented to the SMCC for approval.
- d) Specific care should be taken when using feeds based on Twitter hash tags. There have been a number of examples of hash tags being 'hijacked' and abused.

21.10 Digital communication **Social listening**

- a) Social listening, or online reputation management tools, can be used to track engagement and should be used to highlight relevant comments relating to a brand or campaign. This could cover a particular campaign or site but may provide a picture of the overall brand health.

21.11 Digital communication **Responsible Messaging**

21.11.1 Sites/platforms

- a) All brand sites and social media platforms must include a clearly visible responsibility message (text, icon, or link, as required by the digital channel)
- b) The responsibility message must be clearly visible, permanently displayed and not hidden when, for example, the user is browsing the page or site. Inclusion in the page footer is acceptable, so long as it meets these requirements.

21.11.2 Shareable assets

- a) Any shareable commercial assets (video, photo, text etc.), must include appropriate responsibility messaging. For example, videos must display this messaging in the same way as TV advertisements.
- b) Care must also be taken with images containing messaging within the image itself, or in the associated metadata.

21.11.3 Responsibility Message specifications

The following 3 messages will be used as a standard for web digital formats:

- **Don't drink and drive**
 - **For people over the age of 18 only**
 - **Pregnant women should not drink alcohol**
- a) Facebook
- The responsibility message **"For people over the age of 18 only"** must appear on the age-gateway.
 - **"Don't Drink and Drive"** is to be used in an instance where a motor vehicle is depicted (e.g. win a Golf GTI)
 - The main image requires either one of the 3 web digital responsible messages, the website address www.talkingalcohol.com and the 'no under 18' logo
 - All other images must contain the ARA logo and 'no under 18' logo
 - One of the 3 responsibility messages should appear in at least 1 in 3 images.
- b) Twitter
- The bio section must contain the message "brand name twitter account for 18+ only"
 - Where possible tweets must include "tweets for 18+ only"
 - Desk top application: www.talkingalcohol.com, ARA and 'no under 18' token to appear on the top left hand side of background image.
 - Auto-response messages should be sent to all followers and include the copy "No <18. Enjoy Responsibly."
 - All brand images posted in Twitter must contain the ARA logo and 'no under 18' logo
- c) Websites
- The Responsible Message **"For people over the age of 18 only"** must appear on the age gateway in the standard format
 - **"Don't Drink and Drive"** is to be used in an instance where a motor vehicle is depicted (e.g. win a Golf GTI)
 - Subsequent pages must feature www.talkingalcohol.com, the no under 18 token and the ARA (which must link through to the ARA website – www.ara.co.za).
- d) Mobisites
- The "no under 18" token must feature on Mobi sites.
 - The size of the token must remain static at 35px and must appear at the bottom, centred aligned on mobi sites and at the bottom, right aligned on website banners.

e) Mobile and Direct communication

SMS and Mobile Text Messaging

- Outbound communication must only be sent to an existing database where the user's date of birth is known
- Copy must be added to each outbound message that reminds the recipient that the message must not be forwarded to people under the age of 18. Copy to be used: **"DON'T FWD 2<18"**

Mixit

- Age verified accounts block viewing and interaction with consumers under 18
- Any images or media that are provided from the account are only sent to users over 18
- The no under 18 token should be used on all images and if possible **"DON'T FWD 2<18"** message should follow

Email

- The Responsibility Message and www.talkingalcohol.com must be applied to the footer of all emails (including html and text)
- The standard format for the Responsibility Message must be used with exception of the white block being 10% of the height, it should be 75px.
- Email attachments must also include the Responsibility Message
- Emails may only be sent to recipients where it has been verified that they are over the age of 18

f) General guidelines for other web digital media

- All static background images or images used on secondary sites (banner ads etc.) must include one of the 3 responsibility messages and www.talkingalcohol.com
- Where possible auto-response age disclaimer must be sent to all new followers.
- People who fail the age verification process should be redirected to www.youdecide.org.za

Please refer to COCC Media execution guidelines

21.12 Digital communication **Media placement**

- a) Banner advertisements and other paid-for advertising may only be placed in locations where a minimum of 70% of the audience is reasonably expected to be of legal drinking age based on the best available data.
- b) A placement will be considered reasonable if the audience composition data reviewed prior to the placement satisfied the placement criteria and was the best available data for that medium at that time.
- c) If content can be downloaded, or a site accessed, direct from the advertisement, an age verification process must be applied.

Social Media & Social Listening Guidelines are available from the Alcohol Policy department

Media Definitions

(Not an exhaustive list)

Paid media

Paid media refers to placement that is intended to promote a product, service, website, piece of content or anything else that an advertiser wants makes payment for in order to draw attention for promotional and/or commercial purposes. This can be tracked and measured. Includes any form of payment, compensation, reward or benefit, including barter/material exchange.

Examples:

- ❖ Television commercials, infomercials or advertorials
- ❖ Cinema commercials, infomercials or advertorials
- ❖ Radio commercial, infomercials or advertorials
- ❖ Product placement that has been paid for by brand or for which and form of material exchange/consideration has taken place
- ❖ Billboards and Printed advertisements that have been paid for in magazines & newspapers
- ❖ Digital and Social media promotional content or communications in all forms

Owned media

Any physical or digital asset owned by and/or in respect of which the content is controlled by the relevant brand in general. This includes websites, microsite and social network, branded community, a digital or other application and pieces of branded content. Owned media also includes physical property in which branded content is contained like delivery trucks, vending machines, retail space, tickets to events, printed material used for promotions at events or in outlets. This can also be tracked and measured.

Examples:

- ❖ Brand Websites, Microsites
- ❖ Brand Mobisites
- ❖ Social networks (Facebook, Twitter, YouTube, Memeburn, Pinterest, Google +)
- ❖ Delivery vehicles
- ❖ TV units in outlets
- ❖ Trade marketing material in retail

- ❖ Material that is printed for the brand by the brand (tickets to events, invitations etc.)

Earned media

Earned media refers to brand-related consumer actions and conversations such as P2P or P2B interactions and user-generated content. These have traditionally happened offline but more and more earned media is being generated online. Publicity gained in connection with promotional efforts that are not owned or paid for by the brand or company. Earned media is brand noise and coverage that can't be bought. This can also be tracked and measured.

Examples:

- ❖ Consumer engagements on social networks like Facebook, Twitter, YouTube, Memeburn, Pinterest, Google +
- ❖ Blogs and consumer-owned microsites which may or may not allow for engagement
- ❖ Newspapers, magazines, television programmes & radio programmes that give you coverage that has not been paid for or in respect of which no material exchange has taken place.

Shared Media

Shared media refers to public participation in content creation. It is possible to invite public participation and still have a measure of control over the outcome and use of the content. This includes user-generated content, but is distinct from "earned media".

Examples:

- ❖ Consumers creating brand content on social networks or in any other physical or digital format
- ❖ Consumers creating brand content as part of a brand promotion which is picked up by media agencies and the placement is not paid for by the brand.

Incidental Media Exposure

Exposure that is devoid of any intentional effort to promote brand information. Brands are usually never involved in incidental media by virtue of it being 'incidental' i.e. not intended, but arises indirectly/in a supplementary way, by virtue of being present/associated with another form of communications/media.

Examples:

- ❖ Television or radio that is unscripted recording or broadcast in which brand gets exposure from consumer engagement.
- ❖ Brands used in scripted recording or broadcast which portrays a realistic situation, like artwork or scenes shot in an outlet that have been situated as part of the narrative to portray a reality.
- ❖ User-generate content/communications in any form and format
- ❖ Presence in any form of media, whether physical or digital
- ❖ Presence in cinematographic films or other entertainment media, in an incidental form

Ethical Standards of Behaviour

The following Ethical Standards of Behaviour are contained in SAB Limited's various Policies and Procedures and are repeated here for expediency. SAB Limited binds itself to a set of ethical standards which will govern its commercial behaviour at all times.

To this end, SAB Limited undertakes the following:-

Behaviour towards **competitors**

- a) SAB Limited will not denigrate its competitors or its competitors' products.
- b) SAB Limited will not denigrate any officials or staff members employed by competitors.
- c) SAB Limited will not attempt to gain competitive advantage through the use of personal attacks on competitors.
- d) All relevant SAB Limited employees will be obliged, annually, to sign a Code of Ethical Behaviour in which these principles are enshrined. Employees who violate this code will be subject to internal disciplinary procedures.

Behaviour towards the **public**

- a) SAB Limited will be governed at all times by the law of the land, and in particular the provisions of the Liquor Act and the Competition Act.
- b) In all marketing and advertising campaigns, SAB Limited will strictly adhere to the guidelines set out in the ASA Code of Advertising Practice and will not engage in misleading or deceptive advertising of any kind.
- c) SAB Limited believes that it has a corporate social responsibility to the population at large. To this end, SAB Limited will:-

- d) Continue and expand its corporate social responsibility programmes aimed at securing the basic needs and improving the quality of life of disadvantaged sectors of the population.
- e) Promote the equitable distribution of economic opportunities across the population, particularly through the fostering of black small business.
- f) Continue its commitment to the internal Equity programme aimed at overcoming the imbalance of the apartheid system and providing opportunities to employees from disadvantaged backgrounds.
- g) The above principles will govern SAB Limited's commercial and ethical behaviour at all times, and any infractions, whether intentional or involuntary, will be investigated and corrected as a matter of priority. SAB Limited commits itself to these principles as an expression of its commercial good faith, its belief in a healthy competitive environment, and in acknowledgement of its corporate ethical and social responsibility.

Sales and Marketing Compliance Committee

- a) All SABMiller Group companies must have an internal Sales and Marketing Compliance Committee ("SMCC") that is mandated with ensuring all commercial communication complies with the Code. The Marketing Director is responsible for appointing the SMCC chairperson.
- b) The SMCC must not be chaired by an employee in the marketing or sales division, although he or she may participate as a member. Employee(s) from Corporate Affairs and/or Legal must participate in the SMCC. The majority of decision making members of the SMCC cannot be either marketing or sales employees. Employees from other divisions may serve on the SMCC based on their overall reputation for good judgement, cultural diversity, or relevant experience.
- c) In the event the SMCC is unable to reach consensus on whether a commercial communication complies with the COCC, the SMCC chair shall appeal to the Marketing Director, who shall act as the final arbitrator after considering the conflicting viewpoints.
- d) SAB Pty Ltd is 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 chair to the SMCC.

Enforcement and Monitoring

- a) The SMCC 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, packaging, brand promotions, brand public relations activity, experiential marketing programmes, product placement, merchandising, point-of-sale materials, brand sponsorship and category marketing.
- b) Approval and monitoring processes and procedures should be specified in the terms of reference of the SMCC to support compliance with the Code within new ways or new platforms of commercial communication including, but not limited to mechanisms:
 - Final review and approval of all commercial communication, including that which has been modified as a result of SMCC feedback.
 - Assessing compliance with the 70% threshold for audience data
 - Approval of concept, main features, themes, proactive and static content and of model responses for digital platforms.
 - Monitoring and moderating user-generated or interactive content, including social media sites, comment walls, interactive features, applications etc.
- c) Outcomes of the moderation process and actions taken in relation to user generated content should be reported to the SMCC regularly.
- d) The SMCC is charged with monitoring audience data for all media outlets on a biannual basis to ensure all SABMiller Group companies are meeting the 70% threshold using reasonably available data.
- e) All marketing contracts of SABMiller Group companies must include reference to the Code that requires them to abide by the Code in their activities.

Complaints

- a) The SMCC is responsible for creating and managing a complaints mechanism.
- b) 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 link to relevant external independent complaints mechanisms where possible, so that complaints can be escalated or dealt with externally where necessary.

- c) The complaints mechanism could be a recognised external mechanism that meets with the requirements of the Code and that acts independently to review complaints on behalf of a SABMiller Group company
- d) SABMiller Group companies are encouraged to make decisions arising from the complaints mechanism available publicly.

Training and Education

- a) The SMCC is mandated with providing internal and external marketing and sales personnel with a copy of the COCC on an annual basis.
- b) New marketing and sales employees and/or agencies must attend full AiQ training and will receive a copy of the COCC as part of their induction programme.
- c) All marketing and sales employees and agencies must attend refresher training on AiQ annually.
- d) The COCC must be a component of the Marketing and Sales Ways of Working.

Reporting

- a) As a governance body that is making decisions on behalf of SAB Pty Ltd, the SMCC shall report regularly to the local Executive Committee on its activities including decisions arising from the complaints mechanism.
- b) SAB Pty Ltd shall conduct a self-assessment of their compliance with this Policy in accordance with the ‘SABMiller Sustainable Development Self-Assessment Matrix’.

