



MARKETING COMMUNICATION POLICY

INTRODUCTION AND PURPOSE

“Enjoyment in moderation” is the philosophy that guides all the Carlsberg Group’s marketing. As a company, we take our social responsibility seriously, and we intend to be part of the solution, not part of the problem.

Our brands are household names; we know that they play a part in the lives of millions of consumers all over the world. We are proud of those brands and want to encourage consumers to enjoy them responsibly and in moderation. We present our beer and alcoholic beverage brands as offering refreshment and social enjoyment, for consumption in moderation by responsible adults.

Our marketing communications are always legal, decent, honest and truthful. They are prepared with a sense of social responsibility and respect for the principles of fair competition. We always comply with national regulations, which vary from market to market.

The purpose of this policy is to ensure that our communications always reflect our philosophy of enjoyment in moderation.

SCOPE

This policy applies globally to the management, employees and contract workers of all entities in the Carlsberg Group involved in marketing communications across all relevant channels, including digital.

The policy applies, without exception, to all points of contact with consumers in all media, including:

- Broadcast
- Print
- Cinema
- Outdoor advertising and billboards
- Digital and other new media
- Point-of-sale materials and merchandising
- Labelling
- Product names
- Packaging
- Consumer promotions
- Events
- Sampling
- Sponsorship

The Marketing Communication Policy should be an integral part of any contract and/or included in the briefing for agencies developing marketing materials on behalf of the Carlsberg Group.

REQUIREMENTS

1. SOCIAL RESPONSIBILITY AND MODERATE CONSUMPTION

1.1. Our marketing communications must always be ethical and transparent, with respect for human dignity and generally prevailing standards of taste and decency.

1.2. We must never disregard or encourage excessive or irresponsible drinking; present abstinence or moderation in a negative way; neglect drunkenness or suggest that it is normal or acceptable to be drunk.

1.3. We must always avoid any association with violent, aggressive, dangerous or anti-social behaviour, including violent sports (e.g. boxing, martial arts), any association with drugs or drug culture.

1.4. Our digital marketing communications and digital platforms must include a clearly visible “responsible drinking” message.

1.5. On our digital platforms, we must routinely moderate user-generated content (UGC) so that it complies with the key elements of this policy; include a statement on UGC policy.

1.6. We must respect users’ privacy and always obtain consumer consent before sending out direct digital marketing communications; observe local laws and regulations on collecting data from users; clearly state how, when and why we collect data through privacy statements on our owned digital platforms.

1.7. We must always validate our owned digital platforms through written statements that help users identify our digital platforms as official, wherever possible including an official validation sign such as “✓” on our social platforms.

1.8. We always provide information to consumers about nutritional values, ingredients and responsible drinking on our packaging and online.

2. HEALTH AND SAFETY

2.1. Our marketing communications must not claim that alcohol can prevent, treat or cure any human disease, or make reference to such claims.

2.2. Messages about health that are specifically authorised by the law of a given country, e.g. references to government-issued “sensible drinking” guidelines, are permissible.

2.3. Our marketing communications must never associate drinking alcoholic beverages with driving any kind of vehicle or operating machinery.

2.4. Our marketing communications must never associate active drinking with potentially dangerous activities, such as hunting or extreme sports.

3. CHILDREN AND YOUNG PEOPLE

3.1. Our marketing communications must only be addressed to persons above the legal drinking age. We must never: target minors, i.e. persons below the legal drinking age under national law; include elements with primary appeal to minors, such as toys, playgrounds, schools and zoos.

3.2. We must never: address marketing communications specifically to minors; show minors consuming alcoholic beverages; promote brands in media, events or programmes where more than 30% of the audience is known to be minors; allow sampling of alcoholic beverages by minors.

3.3. Anyone appearing in our marketing communications must be, and appear to be, at least 25 years old.

3.4. We must avoid using themes or treatments with particular appeal to minors, such as child-related music or fairy tales; featuring celebrities with particular appeal to minors.

3.5. To limit underage access, on our digital platforms we include: an age confirmation mechanism wherever possible; where this is not possible, an age disclaimer stating that content is only intended for users above the legal drinking age.

3.6. When a content-sharing functionality is available, we must include a forward advice notice clearly stating that the content should only be shared with persons above the legal drinking age in the country of viewing.

4. EFFECTS OF ALCOHOL

4.1. Our marketing communications must never: attempt to hide the nature or strength of an alcoholic beverage; place improper emphasis on the strength of an alcoholic beverage or indicate that it is preferred due to its superior strength.

4.2. Drinking our product can be presented as an enjoyable part of social life, but we must not suggest that it can contribute to individual social success or acceptance, or to personal popularity. We must avoid suggesting that the success of a social occasion is linked to drinking alcoholic beverages.

4.3. We must never: present our product as an aid to removing personal inhibitions; suggest that it can contribute to sexual success or enhance a person's sexual attractiveness.

4.4. We must avoid linking consumption of our product with mood change; suggesting that consumption can help solve personal problems.

4.5. Our marketing communications must never give the impression that alcoholic beverages can enhance mental ability or improve physical performance. If sports are featured, it must be clearly established that consumption takes place after the sporting activity has ended.

5. PRODUCTS AND PACKAGING

5.1. The Carlsberg Group and its subsidiaries must incorporate “responsible drinking” messaging in all branded communications, all digital marketing (web, social media and video commercials) and all print materials larger than A4.

5.2. We must make information on the potential harmful effects of alcohol available on all our alcoholic beverage packaging, using symbols, text or addresses of websites with equivalent information, in order to discourage: drinking and driving; consumption by underage persons; and consumption by pregnant women.

5.3. Consumer-facing primary packaging for our beer brands must list ingredients and provide nutritional information.

5.4. We must not produce or promote any alcoholic beverages that contain excessive amounts of added stimulants.

5.5. We must not develop new alcoholic products that primarily appeal to underage persons or encourage excessive drinking.

6. SPONSORSHIP

6.1. We must not sponsor or associate our alcoholic brands with individuals and organisations involved with motor sport, gambling, weapons or gaming.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
ExCom	Responsible for policy approval.
Group Commercial (CCO)	Policy owner with overall responsibility to ExCom for marketing communication issues in the Carlsberg Group and for ensuring that material marketing communication risks in the Group are duly attended to and communicated to ExCom/the Audit Committee/the Supervisory Board as relevant.
Global/Local Marketing Director	Responsible for ensuring that this policy is implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements.
Local Brand Owners	Verify and validate marketing materials against the policy.
Local Legal Counsel & Corporate affairs	Verify marketing materials against legal requirements/stakeholder views/industry standards.
VP Corporate Affairs	Joint final decision-maker in the event of escalation.
VP Group Legal	Joint final decision-maker in the event of escalation.
Management, employees and contract workers of all entities in the Carlsberg Group	Responsible for adhering to this policy.

DEVIATIONS

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

POLICY REVISION

Group Commercial, with the support of Group Corporate Affairs, must review this policy periodically, and at least every two years, in order to ensure its continued adequacy and relevance for our business. It may be amended at any time with the approval of ExCom. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.

ASSOCIATED POLICIES AND MANUALS

Not applicable

CONTACT

For more information, please contact Group Commercial.

ENGLISH



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