

GLOBAL MARKETING & COMMUNICATIONS CODE



Contents



OUR 8 PRINCIPLES



INTRODUCTION

PURPOSE

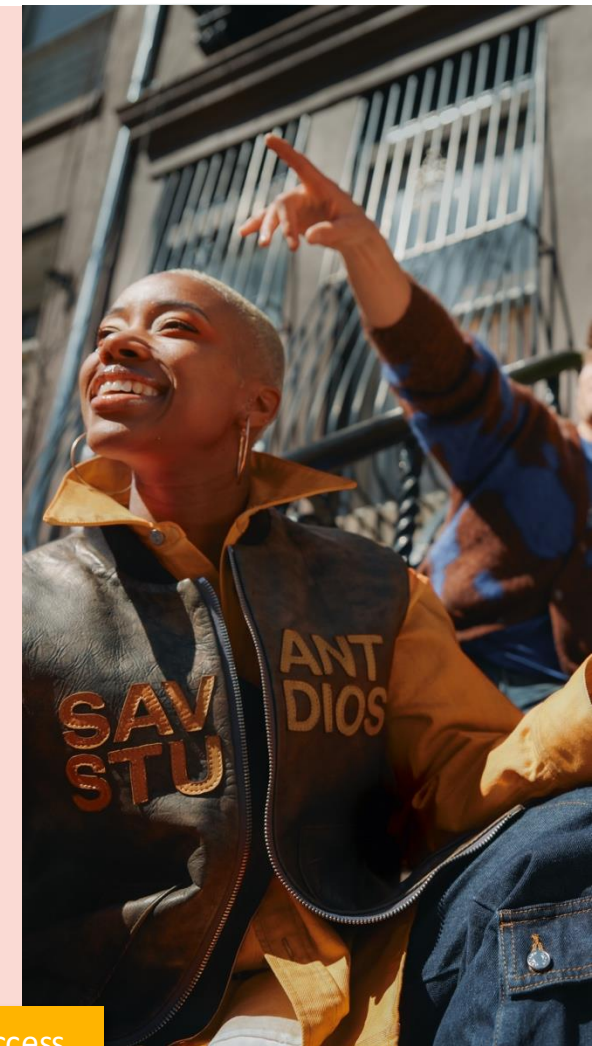
1. TRANSPARENCY & INTEGRITY
2. ADULT APPEAL
3. ENJOYMENT IN MODERATION
4. ALCOHOL- FREE
5. SAFE & SENSIBLE BEHAVIOURS
6. EFFECTS, HEALTH & PERFORMANCE
7. ENVIRONMENTALLY CONSCIOUS
8. SOCIALLY INCLUSIVE

DIGITAL & MEDIA

INFLUENCERS

E-SPORTS & GAMING

SPONSORSHIPS



Click on the chapters for direct access

Introduction

At Carlsberg Group, we are passionate about brewing exceptional beers for people to enjoy all around the globe. Each of our brands is crafted with meticulous care, ensuring every sip enhances your experience, whether you are savouring a quiet moment alone or creating memories with friends.

Our dedication goes beyond just making great beers; we are equally focused on ensuring our products are enjoyed in moderation. This commitment is at the heart of everything we do and is reflected in our Marketing & Communications Policy (MCP). The MCP sets rigorous standards for our communications, ensuring we deliver the right messages to the right audiences. We also adhere to local regulations, respecting and complying with stricter local laws wherever applicable. Together with our industry partners, we take responsibility to protect our right to trade through good marketing practices.

The MCP is not just a set of rules but a guiding framework designed to empower us. It is built on eight core principles and offers detailed guidelines and resources, enabling us to craft engaging, innovative, and responsible marketing campaigns. As a forward-thinking and responsible brewer, we take pride in maintaining these high standards while delivering marketing that aligns with our mission and values.

Yves Briantais
Chief Marketing Officer
Carlsberg Group



Scope & Governance

Scope

The Marketing & Communications Policy outlines the standards for developing consumer-facing marketing or communications on behalf of Carlsberg Group and our brands. This includes alcohol brands and alcohol-free variants of our alcohol brands.

Alcohol-free brands with no connection to an alcoholic mother brand do not fall under this policy.

Compliance with this policy is mandatory for all markets. If local law and regulations are stricter than this policy, local law precedes.

Training

All employees in Corporate Affairs, Internal and External Communications and their agencies, Legal departments and employees in Marketing functions and their agencies must complete annual MCP training (essentially anyone who creates or communicates on behalf of Carlsberg and/or our brands). The MCP must be referred to in all marketing agency contracts and included in the appendix.

Support

Local Legal and Corporate Affairs teams can provide support interpreting the MCP and local legislation. They should be consulted as early as possible during the development of marketing or communications materials. When in doubt, or in the event of suspected non-compliance, the situation should be escalated to Group Marketing and Group Corporate Affairs departments.

Governance

- 🍷 **ExCom:** Responsible for policy approval.
- 🍷 **Group Marketing (CMO):** MCP owner with overall responsibility to ExCom for marketing & communications issues in Carlsberg Group. Responsible for ensuring material marketing communication risks in the Group are attended to and communicated to ExCom/the Audit Committee/the Supervisory Board.
- 🍷 **Global/Local Marketing Director:** Responsible for ensuring that this policy is adhered to, and all relevant employees and agency partners are aware of the MCP and its requirements.
- 🍷 **Local Brand Owners:** Responsible for verifying and validating marketing materials against the policy.
- 🍷 **Local Legal Counsel & Corporate Affairs:** Responsible for verifying marketing materials against legal requirements/stakeholder views/industry standards.
- 🍷 **VP Group Corporate Affairs:** Joint final decision-maker in the event of escalation.
- 🍷 **VP Group Marketing OR CMO:** 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.



OUR 8 PRINCIPLES



1

TRANSPARENCY & INTEGRITY

We act with respect and integrity in everything we create and do. We foster a culture of honesty, so consumers, shoppers and customers can make informed choices with confidence and trust in the quality and safety of our products.

1.1 We ensure that our communications are ethical, truthful, and never misleading.

1.2 All consumer facing messaging is intentionally concise, clear and easy to understand. We avoid complex language that could cause confusion.

1.3 We ensure our communications are respectful and considerate of all audiences, avoiding any content that could be deemed offensive, discriminatory, or harmful.

1.4 We respect intellectual property rights, ensuring that all content is original and properly licensed.

1.5 Any claims about our products are compliant with applicable laws and should not be misleading or exaggerated.

1.6 We list ingredients and calorific information per 100 ml on consumer-facing primary packaging where possible and on websites. We provide, either on pack or online, all seven nutritional measures (energy, fat, saturated fat, carbohydrate, sugars, protein, salt) for all our alcoholic products.

1.7 Our primary packaging will always carry a responsible drinking message (i.e., drink responsibly), a clear age restriction symbol and the alcohol warning symbols discouraging consumption during pregnancy as well as drinking and driving (or equivalent text).



1.8 We always carry the URL of a website (brand or corporate) containing information about the product's ingredients and nutritional information, and the risks associated with excessive alcohol consumption on consumer-facing packaging.

1.9 We make information on responsible drinking and the risks associated with drinking excessive alcohol readily available on our brands' websites.



USEFUL RESOURCES

Click below for further information...

-  [Global Labelling Policy](#)
-  [IARD's Guiding Principles for self-regulation](#)



2

ADULT
APPEAL

Our beers, ciders, and other alcoholic products are crafted for the enjoyment of those over the legal drinking age. Our marketing communications therefore are always designed to exclusively appeal to legal drinking age adults.

2.1 We only promote our brands to people above the Legal Drinking Age (LDA) as stipulated in national or regional law.

2.2 All our communications, products and packaging must be designed to appeal to people over the LDA.

2.3 We do not include celebrities, influencers, athletes, characters, cartoons, music, games, styles, elements, items and behaviours that primarily appeal to those under the LDA or are deemed as appealing to children.

2.4 We only feature people in our communications who are, and reasonably appear to be aged 25 years or over.

2.5 People between the LDA and 25 years old may be involved in unpaid PR activity (i.e. gifting) or partner-led sponsorship communication if our brand is not a primary focus (i.e. Carlsberg Man of the Match)

2.6 We do not repost or engage with social media posts which feature, or are posted by, people under the LDA.

2.7 We only target in-store or in-outlet promotions at people over the LDA. All brand promoters must be over the LDA.

2.8 We only include people over the LDA in consumer research (see Research & Analytics Code of Conduct for further guidance).

2.9 We do not include images of shock value in our communication when referring to responsible drinking.



USEFUL RESOURCES
Click below for further information...

 [WFA's Responsible Marketing Pact](#)



2

ADULT
APPEAL

Our beers, ciders, and other alcoholic products are crafted for the enjoyment of those over the legal drinking age. Our marketing communications therefore are always designed to exclusively appeal to adults.

- 2.10** We only promote our brands in media, events or programmes where at least 70% of the audience is above the LDA (based on demographic data).

2.11 We always activate age affirmation mechanisms (age gates) whenever they are available to prevent people under LDA from viewing our alcoholic brand content.

2.12 Where possible, we use interest-based factors and self-declared age data to remove demographics that may be under the LDA.

2.13 We always apply the five Digital Guiding Principles to our brands' owned digital channels, including social media channels and websites.

2.14 We always take reasonable steps to prevent placing our advertising close to places primarily visited by minors (close meaning within 100m). This includes schools, zoos, and playgrounds as well as religious buildings or places with sensitivities to alcohol.
- 2.15** We sample our alcoholic beverages and alcohol-free line extensions only to people over the LDA.

2.16 In our experiential marketing, we only engage people above the LDA. This includes gifting of alcohol and AFB products.



USEFUL RESOURCES
Click below for further information...

 [Digital Guiding Principles](#)



3

ENJOYMENT IN MODERATION

We want to create positive, enjoyable experiences for people which we can only do when our marketing communications advocate responsible drinking. We always advocate for people to enjoy our products in moderation as part of a balanced, healthy lifestyle.

- 3.1 We show our products being enjoyed in moderation, never encourage excessive or irresponsible drinking and never suggest that it is normal or acceptable to be drunk.
- 3.2 We celebrate the freedom to moderate, always framing it in a positive way and show respect for those who choose not to drink alcohol. We never portray moderation negatively or suggest it's uncool.
- 3.3 We look for opportunities to include a clear and relevant moderation/responsible drinking message that's easily legible across our marketing communications for alcoholic products (including web, social media, OOH and video commercials).
- 3.4 We ensure that sampling activities have appropriate measures and protocols in place to prevent people under the LDA, those intoxicated or those driving from taking part. We never pressure people to consume our products.
- 3.5 As advocates and promoters of responsible drinking, we never sponsor activities that encourage rapid or excessive consumption of alcohol.
- 3.6 At our events, we always offer alcohol-free beverages, water, or carbonated soft drinks to give consumers alternative choices.
- 3.7 We actively monitor owned branded websites and social media to, wherever possible, remove user-generated content depicting irresponsible drinking or irresponsible behaviour associated with our products.



4

ALCOHOL FREE BREWS (AFBs)

Our alcohol-free brews (AFB) are always marketed as a positive choice for adults who want to enjoy our refreshing beverages

- 4.1** We clearly distinguish alcohol-free products (0.5% ABV and under) from products that contain alcohol, so consumers know what they are drinking.

4.2 We are respectful of individuals who choose not to drink alcohol.

4.3 We always promote AFBs as a positive option for those who choose not to drink alcohol and are careful to avoid communicating any negative stereotypes or associations.

4.4 We may present AFB as a positive choice for refreshment in connection with sports only if they are non-extreme and non-violent.

4.5 If AFB is being presented as a responsible choice for those who are driving, alcohol-free products must only be shown being consumed before or after driving, not while driving.

4.6 We do not direct our communications to pregnant women or portray pregnant women consuming AFBs.

4.7 We include the legal drinking age on the primary packaging of our AFBs, as they are meant to provide an alternative to our brews containing alcohol.

4.8 We sample our AFBs only to persons over LDA.

4.9 We do not to sell alcohol-free line extensions in children's or youth institutions or on other premises specifically devoted to those under LDA (e.g. schools).

4.10 We are mindful not to place our AFBs in areas of retail stores with particular appeal to minors, e.g. next to sweets or toys.

4.11 Any claims related to health or performance benefits must be backed by substantiated scientific evidence. Always consult with Corporate Affairs, Group Development, Regulatory and local Legal teams.



WHO THIS APPLIES TO

The term alcohol-free brew (AFB) covers any Beer, Cider, Radler or other beverage that is a line extension of a brand containing alcohol and contains no more than 0.5% alcohol by volume (ABV), unless local regulations state lower. Brands meeting these criteria must comply with the entire policy, unless otherwise stated in the eleven principals on this page.

Alcohol-free beverages with no connection to alcohol brands should follow principles 1, 6 & 7 along with local soft drinks regulations and industry standards.



5

SAFE & SENSIBLE BEHAVIOURS

Enjoying alcohol responsibly means maintaining clear judgment and making safe choices. We proudly promote the sensible enjoyment of our beverages, ensuring they are never associated with potentially hazardous activities or situations.

- 5.1 We actively seek ways to promote responsible drinking in environments and settings where it is safe to consume alcohol.
- 5.2 We deliberately avoid showing consumption of alcohol in situations where it would be unsafe or unwise, for example driving a vehicle, operating machinery or in the vicinity of danger such as a clifftop.
- 5.3 We don't associate our products and brands with violent sports (e.g. boxing, martial arts, bullfighting) or extreme sports (e.g. skydiving).
- 5.4 We never associate our products and brands with violent, aggressive, dangerous or anti-social behaviour.
- 5.5 We avoid any connection with gambling, weapons, tobacco or illegal activities, including those related to drugs or drug culture, or situations that cause harm to animals or people. We never glamourise or trivialise associated issues.
- 5.6 In a sporting environment, it is appropriate to show our alcoholic and 0.0 products only after participation, not during. We never show our alcohol brands being consumed by people actively participating in sports.
- 5.8 We do not associate consumption of our products with driving or any motor sports, motor events or other similar activities. However, we may use our alcohol-free brands and alcohol-free extensions to specifically promote responsible drinking (e.g. don't drink and drive).



ON BRAND PROMOTORS ...

Always comply with our [Brand Promoter Manual](#). When engaging brand promoters at events or as part of any other sponsorship or marketing activation, we must fulfil our commitment to provide a healthy and safe working environment, regardless of where in the world this takes place. Brand promoters must be properly equipped to follow the MCP principles.



6

EFFECTS, HEALTH & PERFORMANCE

We present our brands and products in the convivial social settings in which they’re frequently enjoyed but we are careful not to suggest that alcohol contributes to social success or is in any way beneficial for your health.

- 6.1 We do not suggest that our products or their consumption actively contribute to or enable social success, acceptance, popularity or confidence.
- 6.2 We do not suggest that our products can act as an aid to removing personal inhibitions, can contribute to sexual success or enhance a person’s sexual attractiveness.
- 6.3 We do not suggest that alcohol can be a catalyst for an extreme change in mood or state, that it can solve personal problems, reduce social anxiety or overcome boredom and loneliness.
- 6.4 In accordance with local laws, nutritional claims for alcoholic products must be factual and can only relate to alcohol level and calories. In some markets outside of Europe, sugar claims may be allowed.*
- 6.5 We do not target pregnant women or show pregnant women drinking our products regardless of alcohol content.
- 6.6 We do not suggest that our alcohol brands can prevent, treat or cure medical conditions, nor do we claim that drinking alcohol provides health or dietary benefits.**
- 6.7 We do not give the impression that our products can enhance mental ability or improve physical performance.
- 6.8 We are clear about the nature and strength of our alcoholic products and do not attempt to hide it, or place improper emphasis on their alcoholic strength. We may, however, emphasize the low strength of our alcohol-free brews.

**Make sure to clear this with your local Regulatory Team.*

***This does not restrict the communication of nutritional information and facts. Always consult your local Legal and Corporate Affairs team if unsure.*



7

ENVIRONMENTALLY
CONSCIOUS

Our marketing practices reflect our dedication to championing sustainability. They adhere to legal and consumer demands, while protecting our reputation as an honest and trustworthy company. We always strive to set a positive example for the industry.

Recent legislation in the EU and other markets has set new standards for how companies communicate about sustainability. This is done to protect consumers from vague or misleading claims.

7.1 We always ensure our communication on sustainability matters is honest, contextualized and supported by evidence.

- 7.2** We ensure that any claims of environmental sustainability benefits are:
- Appropriately contextualized (e.g. we take the full product life cycle into account when making any green claims)
 - Substantiated with evidence (e.g. Life Cycle Assessment or recognized certification scheme)
 - Not exaggerated or misleading in any way
 - As specific as possible, avoiding vague general terms like “sustainable” and “green”
 - According to national green claims regulation, EU’s directive on green claims and Carlsberg’s Environmental Claims guidelines
 - Approved by market legal function




7.3 Where relevant, we use our marketing platforms to educate consumers about the importance of sustainability. We encourage environmentally sustainable behaviour in our communications.

7.4 We prioritise the use of recycled, recyclable, and biodegradable materials for all physical marketing collateral.

7.5 Our events strive to incorporate responsible sourcing and waste reduction practices, including but not limited to waste sorting and procuring recycled, recyclable, and biodegradable materials.

7.6 As signatories to WFA’s Planet Pledge, all of our marketing practices support the sustainability agenda and recognise important role of marketing as a force for good.

USEFUL RESOURCES
Click below for further information. For support, contact Corporate Affairs.

-  [The Carlsberg Group’s Environmental Policy](#)
-  [WFA Global Guidance on Environmental Claims](#)
-  [WFA Planet Pledge](#)



8

SOCIALLY
INCLUSIVE


We are committed to ensuring that our company and brands respect our consumers' diverse backgrounds, identities, and experiences. Our goal is to create an environment where everyone feels seen, valued, and included.

- 8.1 DE&I (diversity, equity & inclusion) is a priority for us at Carlsberg, which means all of our marketing and communications are inclusive and respectful of the diverse communities we serve.
- 8.2 Our communication will always be sensitive to, and respectful of, the diversity of our society, including but not limited to race, ethnicity, religion, gender, age, sexual orientation, disability, and socio-economic status. We encourage our partners to have diverse staffing and we ensure that our media ‘safe guarding protocols and words’ do not work against supporting diverse platforms and communities.
- 8.3 We are sensitive to cultural differences and ensure that any communication and its themes are not considered inappropriate or culturally insensitive across the markets we operate in.
- 8.4 We are sensitive to, and respectful of, groups or individuals who do not wish to associate with alcohol.
- 8.5 We consciously avoid perpetuating any harmful stereotypes, using discriminatory language or stigmatising any group of people.
- 8.6 We partner with influencers, ambassadors, and organisations that share our commitment to social inclusion and responsible drinking.
- 8.7 We prioritize working with external partners and organizations that champion social inclusivity in their employment practices.



USEFUL RESOURCES

Click below for further information...



[The Carlsberg Group’s Diversity, Equity & Inclusion Policy](#)



CHECKLIST

Review any marketing material or communication you develop and check whether you can confidently say that...

- ✓ No one viewing this communication would find it inconsiderate towards them personally or to others?
- ✓ Each message and claim in your communication is truthful and not misleading?
- ✓ The people in your communication are over 25 years old and give the impression that they are older than 25?
- ✓ You have taken all reasonable measures to restrict people under the LDA from being exposed to your communication?
- ✓ Moderation is conveyed as a positive lifestyle choice in your communication (if applicable)?
- ✓ There is no direct or indirect connection to violence, extreme sports or aggressive behaviour?
- ✓ You could verify all claims you've made with factual evidence?
- ✓ You've done a sensitivity check with a culturally diverse group of people to ensure your work is free from any harmful stereotypes?
- ✓ You can substantiate your environmental statements with solid evidence?





SPECIFIC GUIDANCE



DIGITAL MEDIA

Our communication in digital media, including e-Commerce, must adhere to the full scope of this policy. Additionally, the following principles apply:

- We always activate age affirmation mechanisms (age gates) whenever they are available.
- We only promote brands in media (including digital), events or programmes where at least 70% of the audience is above the legal drinking age (no more than 30% is below) based on demographic data – on all channels where age affirmation mechanisms are not available.
- Always use data to ensure that ads are targeted appropriately on digital channels where age gates are not available. Where possible, we use interest-based factors as well as self-declared age data to remove demographics that may be under the legal drinking age.
- We always compile a brand safety list to prevent brand content being placed near underage content.
- We always apply the five Digital Guiding Principles to our brands' owned digital channels, including social media channels and websites:
 - **Age gate:** We use an age affirmation mechanism (age gate) whenever available to limit underage access. Where not available, we include an age disclaimer stating that content is intended only for users above the legal drinking age.
 - **Forward advice notice (FAN):** We include a forward advice notice in an account's bio where content-sharing functionality is available – clearly stating that the content should only be shared with persons above the legal drinking age in the country of viewing.
 - **Responsible drinking message:** We always include a clearly visible responsible drinking message in an account's bio.
 - **Transparency/official signpost:** We verify owned digital platforms to help users identify them as official through either an official verification sign such as "✓" or a written statement such as "This is the official <brand name> channel".
 - **User-generated content guidelines:** We never engage with any user-generated content (UGC) that would promote irresponsible alcohol consumption or otherwise breach principles of this policy, and inform users that irresponsible content will be removed through a UGC policy.
- We carry information on responsible drinking and the risks associated with excessive alcohol consumption within one click of the landing page on our brands' websites.
- We actively monitor owned branded websites and social media pages and, wherever possible, remove user-generated content that is not in line with our policy.
- We adhere to all relevant privacy laws if we collect personal consumer data via digital media. We always ask for consumer consent and give them a choice to opt-out.
- In e-Commerce, we use age affirmation mechanisms as well as retailers' knowledge of their customers to ensure that alcohol related advertising is not shown to people under the LDA and religious groups where consumption of alcohol is banned.

INFLUENCERS

We only work with influencers who promote enjoyment in moderation and responsible drinking.

When we have a contractual or other material relationship in place with an influencer (paid, incentivised or unpaid) we always adhere to the following principles:

- Always use age-affirmation mechanisms on digital platforms to prevent people under LDA from viewing our alcoholic brand content.
- Any endorsements or testimonials used in our marketing will be genuine and reflect the honest opinions of individuals.
- When age-affirmation mechanisms aren't available, ensure paid influencers are at least 25 years old, primarily appeal to adults and promote our products on platforms where at least 70% of the audience is above the LDA (based on demographic data).
- Always have a signed written agreement in place when working with paid influencers and agencies. Make sure to include information on local legal requirements, clear disclosure guidelines, responsible marketing guidelines and best practice examples.
- Always monitor paid influencers to ensure that they comply with our MCP and remove non-compliant posts within 72 hours.



E-SPORT & GAMING

To meaningfully engage consumers within the rapidly expanding E-Sport and Gaming field, it's important to respect the culture and values of e-sports communities.

- We never associate our brands and products with games of violent nature (e.g., first-person shooters or combat games) or games that don't align with the Carlsberg Group values.
- We do not associate our brands with games related to driving or motor sports, unless specifically promoting responsible drinking in connection with our alcohol-free brands or products.
- We only engage with games or e-sports on touchpoints where at least 70% of the audience is above the legal drinking age based on demographic data – on all channels where age affirmation mechanisms are not available.
- A minimum of 10% of all actual or virtual sponsorship and event assets that are consumer facing (i.e., virtual football perimeter adverts) must be utilized for a responsible drinking or alcohol-free message.
- When engaging with gamers, streamers or talent related to e-sports, the same principles apply as for influencers (see section on influencers).
- At events, we do not place brand messaging or sponsorship messaging where minors could be exposed to them. We also do not sample our products (including AFBs) to people below the LDA.
- All principles apply to, but are not limited to, the following touchpoints:
 - Advertising, product placement, virtual goods or modifications/customizations available in any digital ecosystem or platforms (i.e., streaming platforms or in-game placements)
 - Any media placement outside of in-game advertising, but in connection with gaming or e-sports
 - Virtual or real-life events, including industry events, award shows and tournaments
 - All elements pertaining to e-Sports sponsorships
 - Talent activation and amplification of partnerships on organic, paid or earned social media, PR and traditional media
 - Original IP development or co-development (games or digital universes developed by us)
 - Limited edition products and merchandise
- Always gain approval from Group Marketing's media team/sponsorship team before commencing any advertising/sponsorship relating to gaming or e-sports.

USEFUL DEFINITIONS & RESOURCES

E-SPORTS - Multi-player video games which are played competitively for an audience (both online and offline), sometimes for special organized events.

GAMING - Playing an electronic video game, which is often done on a dedicated gaming console, PC or smartphone



[Code of Ethics and Conduct](#)



SPONSORSHIPS

We strive to create meaningful, responsible partnerships with people and events that align with our values and those of our consumers.

- We only sponsor, promote or associate with events where at least 70% of the audience is above LDA.
- We never sponsor activities, events or individuals involved with gambling, violent sports, extreme sports, tobacco, illegal drugs, sports/events that cause harm to animals or sports/events that are likely to be part of youth culture and of disproportionate appeal to children.
- We never engage in sponsorship activity that would connect our brands to violence, weapons or dangerous pursuits.
- We do not associate consumption of our products with any motor sports, motor events or similar activities, unless specifically promoting responsible drinking in connection with our alcohol-free brands or products.
- We never associate consumption of our products with any active athlete (brand in hand) unless specifically promoting responsible drinking in connection with our alcohol-free brews.
- All brand communications around our sponsorships must only feature talent over the age of 25. Talent between LDA and 25 may be engaged in unpaid PR and partner-led communication such as Carlsberg Player of the Match, in which our brand is not a primary focus and/or is hosted on a partner platform.
- We are sensitive to and respectful of talents' cultural, religious, spiritual and personal beliefs prohibiting them from taking part in any activities with our alcoholic brands (e.g., no Carlsberg branding on Player of the Match visuals with players below 21 or Muslim players).
- A minimum of 10% of all media facing actual or virtual sponsorship and event assets must be utilized for a responsible drinking or alcohol-free message.*
- We strive to make alcohol-free beer, water or carbonated soft drinks available at all sponsored events.

When entering new sponsorship contracts, please share with Group Marketing.



*This applies to assets that are part of a sponsorship or event deal. It does not apply to media assets placed through media agencies.



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Policy Owner: Nele Cznotka, Group Marketing

Approved By: Yves Briantais, Group CMO

Carlsberg Breweries A/S

J.C. Jacobsens Gade 1

1799 Copenhagen V

Denmark

