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Coca-Cola
Hellenic Bottling Company

Coca-Cola HBC Responsible Marketing Policy
Premium Spirits

Introduction

The Coca-Cola HBC Premium Spirits Responsible Marketing Policy is intended to provide clear and consistent guidance to all employees about our standards for responsible marketing, advertising and promotion of the premium spirits products the company distributes and sells on behalf of its business partners.

The Policy is to be strictly adhered to in the same manner as the codes, policies and commitments regarding Coca-Cola HBC operations and activities in respect of the non-alcoholic beverages we produce and distribute in order to reflect the company's high standards, core values and social responsibility commitments.

Scope

The Coca-Cola HBC Responsible Marketing Policy for Premium Spirits applies to all marketing activities including but not limited to selling activities, merchandising, sales and brand advertising, on-and off-premise promotional activities and related materials, brand innovation activities, experiential marketing, consumer planning and market research, relationship marketing, consumer public relations, the development and content of brand web sites, electronic communications and digital media, product placements and sponsorships, and labeling and packaging.

Compliance with Law and Regulation/ Regulatory Framework

All marketing activities must be in accordance with the applicable laws of the countries where Coca-Cola HBC sells and distributes premium spirits. Commercial communication for premium spirits, regardless of the media used (print, electronic/digital media, posters, packaging, promotions, sponsorships and other promotional activities) must also comply with the applicable provisions of industry- agreed guidelines for each country. For Europe-wide, industry common marketing standards, please refer to the documents and materials which can be found at www.marketresponsibly.eu, provided by spirits Europe, of which our premium spirits partners or their industry associations are members.

A. Underage Provisions

(*)Note: In this Policy, the term "LPA" (Legal Purchase Age) means the legal age of alcohol purchase or the age of 18 years in markets where there is no legal age (LPA) or the legal age (LPA) is under 18.

(**)Note: In this Policy the term "marketing" refers to all activities listed in "Scope" section, and any other activity designed to promote our products in the market.

Coca-Cola HBC only markets to consumers of Legal Purchase Age and commits to ensure that underage persons are not and will not be targeted by our marketing and promotional activities. Premium spirits must never be used to sponsor sports, celebrities or events that appeal primarily to people under the Legal Purchase Age.

Restrictions and guidelines concerning Content and Placements are as follows:

Content

- While some countries have legal purchase ages lower than 18, or do not set legal purchase limitations at all, it is company policy for marketing campaigns for premium spirits to never target people under the age of 18.

- We do not allow the participation of models in advertisements who have not reached the age of 25 years, and nor should anyone below that age actively endorse our partners' premium spirits products.
    - Persons aged between Legal Purchase Age and 25 years may attend, provide entertainment at or provide services at branded events and/or appear in PR material

- Advertising and marketing materials must never utilize or depict children, and should not employ sports or celebrity figures, cartoon characters, music, language, gestures or other symbols or promotional gifts or prizes that appeal primarily to people under the LPA.

- Advertising and marketing activities should not directly or indirectly degrade studying or associate the consumption of premium spirits with education.

- Promotional activities and events of premium spirits should target people over the LPA only and not be suggestive of, or demonstrate irresponsible behavior. For example, marketing and promotion of premium spirits should not show people swiftly consuming these products or in a competitive drinking environment. In general, we should not employ novelty drinking vessels that have an overtly juvenile appeal (e.g. test tubes, Jell-O shots).

(*)Note: The term «primarily appealing» to people younger than the Legal Purchase Age means something which is particularly attractive to people under the Legal Purchase Age as opposed to "generally appealing" to people above the legal purchase age (LPA).

- Coca-Cola HBC's premium spirits should not be associated with the attainment of adulthood or "rites of passage" to adulthood.

- Coca-Cola HBC marketing should neither present in a negative way alcohol abstinence or minimal consumption of alcohol, nor imply that refusal to drink is wrong or not "cool", not even jokingly. Coca-Cola HBC promotional activities in on trade and off trade will never put pressure on anyone to consume alcohol and should always include non-alcoholic alternatives.

Placements

- No brand identification, including logos, trademarks, or names, should be used or licensed for use on children's clothing, toys, games or game equipment, or other materials intended for use primarily by people below the Legal Purchase Age.

- Adverting and marketing materials should only be placed in media where at least 70% of the audience is reasonably expected to be above the legal purchase age (LPA).

- To facilitate these placement commitments, we should regularly monitor the composition data of the media in which advertisement is placed, in order to ensure maximum compliance and that the audience composition data are current and appropriate.

- Internal, periodic audits of past placements should be undertaken to verify that past placements were in compliance with this policy.

- The premium spirits brands Coca-Cola HBC sells and distributes should not be advertised in college and university newspapers where more than 30% of the students are under the Legal Purchase Age.

- All reasonable measures should be taken in order to avoid advertising near schools, outside of stores with on-site alcohol consumption. Particular attention will be given in avoiding advertising near religious buildings or other places that might be considered offensive or not suitable.

Research

- Coca-Cola HBC will not assign or conduct market or consumer research among people below the Legal Purchase Age.
- In the context of consumer research we will limit consumer samples to a maximum of two standard drinks per day and provide transportation afterward if we have any question about an individual's ability to get home. We will never arrange research sessions in a manner where attendees might need to drive following the consumption of alcohol.

B. Responsible Drinking

Coca-Cola HBC believes that responsible premium spirits advertising helps promote responsible consumption of the products we sell. In pursuit of our Policy, the following guidelines apply to all advertising, marketing and sponsorship initiatives.

- Advertising, marketing and sponsorships should include an "Enjoy/ Drink Responsibly" message, and may also include other messages about responsible consumption. If communications are customized for special displays, banners, announcements, press releases or internet use etc, approval must be sought from the Public Affairs & Communications and Legal Departments and be in compliance with Coca-Cola HBC's Premium Spirits Communications Policy.

- Sports sponsorships must incorporate a prominent responsible drinking initiative.

- The premium spirits brands that Coca-Cola HBC sells and distributes must not appear in or directly adjacent to print or electronic programmes that dramatize or glamorize over-consumption or inappropriate use of adult beverages.

- Advertising and marketing materials must not portray people in a state of intoxication or in a way that suggests that intoxication is an acceptable conduct. Intoxication should never be condoned as an acceptable behavior. Similarly, advertising and marketing materials should not portray people drinking quickly or excessively.

- Coca-Cola HBC must not promote nor condone activities where the consumer does not have control over the amount of alcohol delivered for consumption, such as drinks being prepared furtively or in deceptive containers.

- The premium spirits brands that Coca-Cola HBC sells and distributes must not be associated with abusive or violent relationships or situations, or with anti-social or dangerous behavior.

- In all communications alcohol content must be referenced in a straightforward and factual manner without touting the strength of Coca-Cola HBC's premium spirits brands in any advertising or marketing material.

- Premium spirits must not be presented as being acceptable to consume before or during the handling of machinery, driving a vehicle, or any other activity which requires high degree of concentration and body coordination.

- Advertising and marketing materials or sponsorship activities should not imply that adult premium spirits consumption is necessary to obtain social, professional, educational, athletic, sexual or financial success, or to solve social, personal, or physical problems. The materials and sponsorship activities should not create the impression that the consumption of premium spirits beverages increases mental ability or physical performance or improves one's mood.

- The promotion of premium spirits recipes must prescribe specific portions (e.g. "30ml" instead of "one part") and the total alcohol content (in "alcohol grams" or other locally recognized measurement units) for each premium spirit drink. As a general rule, a single serve drink recipe should not contain more than the equivalent of 50ml of alcohol at 40% Vol.

- Promotion of premium spirits in close association with promotion of an energy drink should be avoided.

- We should avoid any association of the premium spirits we are selling and distributing with tobacco products or gambling for money.

- We will not promote premium spirits as a medicine-drug nor imply that premium spirits have the ability to prevent, treat or cure any disease or condition of a human being.

- Advertising and marketing materials must not make any health claims.

- We will not suggest that beverages with lower alcohol content are better or more responsible to consume than premium spirits with higher alcohol content. We will have regard, in the design of our premium spirits marketing activities, to any daily/weekly consumption guidelines issued by the Health Authorities, or equivalent body in the market where the activity is taking place.

- It is acceptable to depict adults consuming a drink after a sporting game, only when clearly stated that their activity will not be continued afterwards.

- Advertisements must not be shown during sports events organized for children.

- We will not market the premium spirit drinks we sell and distribute to pregnant women or use pregnant women in our marketing activities.

Digital Marketing

- Any websites of Coca-Cola HBC which include the premium spirits brands that the company sells and distributes must include a "responsible drinking message" and a login page that:
  a) Requires consumers to input their date of birth and country of access;
  b) It will be linked with an educational site for responsible consumption of premium spirits; and
  (c) It includes 'nanny' tags which describe the content of the webpage in a manner that permits their spotting by parental control software.

    - If premium spirits are to be referenced on social media pages, such pages should use any available setting which identifies the page as having alcohol-related content, and/or should take advantage of any access restriction offered by such social media platforms where access can be restricted to users/visitors above the Legal Purchasing Age.

- Special attention must be paid to any premium spirits brand websites and any digital marketing activities or other communication set up and managed by Coca-Cola HBC. Local laws in countries where the web sites or other digital media can be accessed must be applied. Further advice might be sought from the country legal department in each Coca-Cola HBC market where we sell and distribute premium spirits.

C. Promotional Events

In conducting promotional events we must ensure that we promote our premium spirits brands in a responsible manner.

Principles

- Both on- and off- premise promotions should avoid activities that reward excessive/abusive consumption.

- Coca-Cola HBC will not employ either directly or indirectly event staff or volunteers under the Legal Purchase Age.

- Coca-Cola HBC will not promote or encourage any drinking in combination with physically, challenging, promiscuous, reckless, and/or irresponsible behavior at an on-premise promotion.

- All Coca-Cola HBC promotional and sponsorship events should include responsible drinking messages and programmes where applicable (e.g. banners with responsible drinking messages free water or other non-alcoholic beverages, and/or safe ride home or designated driver programmes).

Personal Conduct

All personnel whether they are company employees or promotional staff involved in on- or off- premise promotions must adhere to the following guidelines:

- If you chose to drink alcohol, you must do so with moderation. In other words, be mindful of the fact you are on company business and a company representative. Set an appropriate example.
- Do not drink and drive.
- Do not behave in a manner inconsistent with Coca-Cola HBC values and guidelines on daily behavior.
- Do not pressure others to drink.
- Do not engage in reckless behavior or stunts.
- Be sensitive to any action or behavior that may create discomfort to others.

D. Responsible Drinking Statement

Coca-Cola HBC has and will continue to develop cooperation and partnerships with many different social partners to promote responsible drinking and condemn excessive or irresponsible alcohol consumption, such as drinking and driving etc.

Content

Each brand can adopt a responsible drinking message that is unique to the brand and in keeping with the brand's image. Just as we are proud of the premium spirits brands we sell and distribute, we proudly promote responsible consumption. This pride should be reflected in the size and prominence of our statements in our advertising and other communication channels.

Size and location

Exact specifications and application instructions of the "Enjoy/Drink Responsibly" message for each platform of media (print, outdoor, TV) are included in the marketing guidelines of each brand owner with which we partner. Any applicable regulations in a local jurisdiction should also be adhered to.

The provisions of this Policy must be read in conjunction with the Marketing Policies of our brand owners and our Code of Business Conduct. In case of conflict, the Marketing policy of the respective brand owner sets stricter standards than this policy, such stricter standards will be applied with regard to the brand owner's premium spirit products. In case of doubt, you must consult with your local Legal Department.

E. Compliance with Policy

Compliance with this Policy is mandatory for all Coca-Cola HBC employees, not only to meet the company's commitment to promote responsible drinking, but also to protect the reputation of Coca-Cola HBC and our brand owner partners. This policy is an integral part of the approval process for all marketing material and should be used on a day-to-day basis.

Different functional and levels of approval are required for all marketing, advertising, promotional and sponsorship activities in the on- and off-trade, brand innovation activities, experiential marketing, consumer planning, relationship marketing, brand launch campaigns, consumer public relations, and all other activities performed to market Coca-Cola HBC's premium spirits brands. These approvals will differ by country and will take into account local laws governing the sale and distribution of premium spirits. The specific approvals for each country are set forth in Country Marketing and Approvals Codes which should be read in conjunction with this policy.

Advertising agencies, market research companies, media buyers, promotional agencies, importers, and other external consultants or affiliates must receive a copy of this Policy as part of their communications brief from the company and must commit in writing to abide by its provisions in any work they do on behalf of Coca-Cola HBC.

Any complaints or criticism by any person relating to the marketing and promotion of premium spirits products by Coca-Cola HBC should be reported immediately to the local PA&C and Legal Departments to proceed with any appropriate or necessary actions.

Education

Coca-Cola HBC countries selling and distributing premium spirits must establish regular training programmes for all staff involved in the sales, merchandising, consumer marketing, trade marketing, customer planning, R&D and PA&C of premium spirits brands.

If you wish to receive more information relating to this Policy or compliance with its provisions, please contact your local premium spirits manager or PA&C and Legal departments.

Last updated: April, 2015.