



DEMERARA DISTILLERS

LIMITED

DDL-COR-GEN-POL-001

Revision #: 0 Version: 1

Revision Date: 2021/05/11

Next Revision: 2022/05/11

Responsible Advertising and Marketing Code of Practice

Introduction

Demerara Distillers Limited (DDL) is committed to the responsible advertising, marketing, and promotion of its products on the local, regional and international markets; both traditionally and digitally. In view of this, DDL has adopted the WIRSPA Code of Practice, which governs and promotes the responsible advertising and marketing of spirits drinks by WIRSPA members. DDL is committed to the principles and standards of the Code and its effective implementation.

Scope

This Code is intended to cover all advertising and promotional activities, including sponsorship, sampling, packaging, product and company websites, press releases, new technologies and all other promotional tools.

The Code applies to every type of communication medium, including the internet, text messaging and the use of social media which can be used to advertise, or market beverage alcohol produced by WIRSPA Members. It also applies to all retail merchandising.

The Code is intended to be informative to the stakeholders and to demonstrate the intent and action of the industry on this issue. This code should support efforts aimed at significantly reducing the incidents of harmful and irresponsible consumption of spirits.

All marketing communications should be honest and truthful.

1. Responsible Consumption

Marketing materials should promote a responsible approach to alcohol consumption.

Promotional and marketing activity should not seek to challenge someone's choice to not drink, nor suggest that the decision not to drink alcohol is in any way socially unacceptable or anything other than a legitimate personal choice.

Promotional and marketing materials that show product consumption should portray products being consumed and drinkers behaving in a responsible manner and shall not target the youth market, vulnerable persons, or pregnant women.

Marketing communications should never promote, support, or condone illegal, irresponsible or immoderate consumption, such as binge drinking or drunkenness. Consumption must not be portrayed or encouraged before or during the use of machinery, driving or undertaking any potentially hazardous pursuit or pastime.

Marketing should never suggest drinking being associated with driving prowess, violent, aggressive, dangerous, or anti-social behaviour.

Marketing should never suggest drinking being associated with, acceptance of, or allusion to, illicit drugs.

A responsible drinking message (RDM) should be carried on all advertising: traditional and digital, including brand websites, and print point of sale materials.

2. Alcohol and Health

No impression should be given that alcohol consumption can enhance mental or physical capabilities.

Marketing should not portray products as having or suggesting that they have health or therapeutic qualities or the ability to prevent, treat or cure illness.

3. Social and Sexual Success

Consumption may be portrayed as part of responsible personal and social experiences and activities, such as the depiction of persons in a social or romantic setting, persons who appear to be attractive or affluent, and persons who appear to be relaxing or in an enjoyable setting.

Marketing communications should not contain any claims or representations that individuals can attain social, professional, educational, or athletic success or status as a result of alcohol consumption.

Marketing communications should not suggest that drinking enhances sexual capabilities, attractiveness, masculinity or femininity, nor suggest any association with sexual activity or sexual success.

Marketing and advertising should avoid the use of graphic or gratuitous nudity, overt sexual activity, promiscuity or sexually lewd or indecent images or language.

Communications should adhere to generally accepted standards of good taste.

4. Protecting those under Legal Purchase Age (LPA)

Marketing should not be directed at or primarily appeal to persons below the legal purchase age. Marketing materials and promotions should not depict anyone under legal purchase age or portray objects or images that primarily appeal to persons below the legal purchase age.

Brands should not be advertised or promoted by any person who is below the legal purchase age or who is made to appear to be below the legal purchase age. To help ensure that individuals in advertising are

and appear to be above the legal purchase age, models and actors shown drinking should be a minimum of 25 years old.

When the services of a celebrity are used to advertise or endorse a product, that person should not primarily be associated with or be appealing primarily to persons below the legal purchase age.

Communications should be placed in print and digital media only where at least 70% of the audience is reasonably expected to be above the legal purchase age.

Advertising for alcoholic beverages should not be placed on any outdoor stationary location unless out of the clear view of an established place of worship, school or children's playground, except on a licensed premise.

Brand logos and names should not be used on clothes, toys, games, or other items intended for use primarily by persons below the legal purchase age.

Products should not be advertised or marketed in a manner associated with the attainment of adulthood or the "rite of passage" to adulthood.

This Code does not apply to any materials or activities whose purpose is solely and clearly to educate those under the legal purchase age about the use and misuse of alcohol or the industry's role in society. For example, responsibility messages such as those that communicate that the product should not be purchased or used by those under the legal purchase age are not intended to be prohibited by the Code.

5. Alcohol Content

To promote responsible consumption, products should provide unit/ standard drink information in order that consumers can make informed choices.

The alcoholic nature of a drink should be communicated on its packaging with absolute clarity, in line with national legal requirements.

Alcohol strength should never be the dominant theme of any marketing communication.

Undue emphasis should not be placed on higher alcohol content as the principal basis of appeal. The responsible marketing of cask strength products will not breach this Code.

6. Drinking and Driving

Advertising and marketing materials should not portray, encourage or condone driving any motor vehicle after drinking.

The consumption of alcohol must not be portrayed or encouraged before or during the use of machinery, driving or undertaking any potentially hazardous pursuit or pastime.

7. Trade Promotions & Tastings

When conducting promotions and tastings, never encourage responsible consumption and discourage activities that reward excessive and/or abusive consumption. When conducting events, companies should recognise existing government sensible drinking guidelines and not offer to any one individual alcohol exceeding these recommendations.

Wherever applicable, the RDM should be placed on the landing page. Marketing communications may include a visible responsibility tab as an alternative or in addition to the RDM (e.g., on social media pages).

ii. Age Affirmation

All digital marketing communications where possible or appropriate require age affirmation based on full date of birth and country of residence whenever digital marketing communications actively engage a user to interact directly with a brand.

If the age-affirmation mechanism used includes a “remember me” option, an additional notice should be included on the age-affirmation page reminding the user to consider the appropriateness of accepting this option if the computer is shared with other users below LPA.

Whenever a user’s access is denied through an age-affirmation mechanism, this user should be sent an appropriate message and/or be redirected to an appropriate alcohol-related social aspects website. Users should not be able to easily back click and re-enter a different date of birth.

In case the digital platform on which marketing communications are placed allows direct interaction but does not provide any age-affirmation mechanism, the following should be considered:

- the platform’s audience in the country for which the marketing communication is intended should meet the stated audience composition targets, where at least 70% of the audience is of LPA;
- an age disclaimer or statement should be placed reminding users that the content is intended for LPA users only;
- the platform should provide a mechanism to remove or moderate inappropriate UGC.

iii. Media Placement

Use only media which can reasonably be expected to meet the threshold of at least 70% of the audience being over the legal purchase age.

Pages or fan groups on third party sites must ensure the content complies with the requirements of the Code (i.e., in relation to responsible consumption, protecting those under the legal purchase age, alcohol content, drink & driving, sexual & social success, alcohol & health).

10. User Generated Content

User Generated Content (UGC) which appears on company websites or sites over which the company has editorial control should be monitored and moderated on a regular basis for compliance with the Code. UGC that appears on third-party websites over which the company has no control is outside the scope of the Code.

When UGC is allowed, there needs to be community guidelines stating the UGC policy, which can be included in the abovementioned responsibility tab.

11. Forward Advice Notice

Whenever content can be shared, a Forward Advice Note (FAN) should be included clearly stating that the content not be forwarded to anyone below the legal purchase age in the country of viewing.

The Forward Advice Notice should be visible, on all platforms (and/or directly in digital marketing communications) designed for sharing content, such as social media pages, mobile applications, and direct digital marketing communications.

12. Data Privacy

Digital marketing communications must respect user privacy. Consumer consent is required prior to sending direct digital marketing communications.

Consumers must be provided with an easy way to opt out of receiving direct digital marketing communications.

With regards to the collection and use of data, data privacy statements regarding the collection and use of personal data must be featured on company-controlled websites.

13. Transparency

Digital marketing communications and product promotions must be transparent and not misrepresent their true commercial purpose.

14. Responsibilities, Compliance and Review

The Code is implemented by the Marketing Department. All marketing communications must be reviewed by the Marketing Review Committee before dissemination. The Committee is comprised of the Marketing Director, Brand Communications Manager and one (1) Brand Manager. Training programmes are conducted, when necessary, for employees involved in the advertising or marketing of brands. Additionally, external consultants, such as public relations, marketing and advertising agencies and third-party distributors working on marketing for the Company are aware of the principles and provisions of this Code. The Code will be reviewed annually and updated as necessary.



Komal Samaroo
Chairman