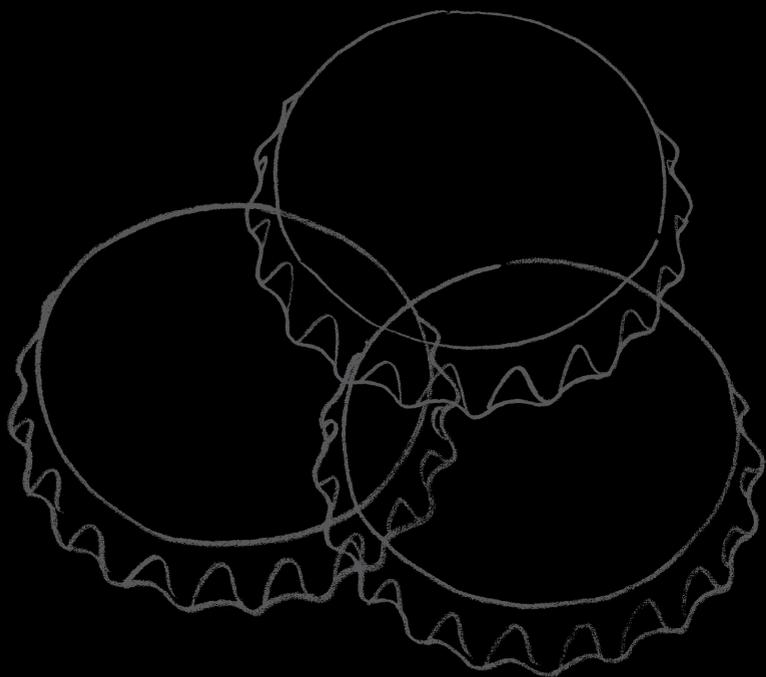


2011

Policy on Commercial Communication



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Introduction

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 companies to adhere to the **SABMiller's Policy on Commercial Communication**, which establishes consistent standards for the marketing of our brands worldwide.

We further encourage the adoption of and adherence to brewer and other relevant self-regulatory codes in local 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 (Policy on Commercial Communication, Market Research Policy) and local procedures to follow. Sales and marketing personnel are essential to help protect our licence to trade, which includes the marketing and promotion of our brands.

This Policy on Commercial Communication applies to all SABMiller Group companies. The Policy does not cover commercial communication of non-alcohol beverages except non-alcohol beverages having the same brand name as that of an alcohol beverage.




Grolsch

Section A: Code of Commercial Communication

The Code of Commercial Communication ('the Code') provides SABMiller Group companies with consistent minimum content and placement standards for commercial communication.

The term 'commercial communication' means product (brand) advertising in all media (including digital media, the internet and text messaging), packaging, brand promotions, experiential marketing programmes, product placement, merchandising, point-of-sale materials and brand sponsorship.

'Commercial communication' does not include: research (Market Research Policy applies); communication devoted exclusively to sustainable development and preventing the irresponsible consumption of alcohol; press releases; corporate communication; or statements to the media or government.

Basic principles

01 Commercial communication must:

- be legal, decent and truthful and conform to accepted principles of fair competition and good business practice;
- 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; and
- not employ themes, images, symbols or figures which are likely to be considered illegal, offensive, derogatory, demeaning or disparaging.

Preventing underage appeal

- 02 Commercial communication may not be directed at persons under the legal drinking age (or, in countries without a legal drinking age, to persons under the age of 18).
- 03 Paid actors or models in commercial communication must be a minimum of 25 years old and reasonably appear to be at least 21 years of age. In the case of brand promotions, all members of the promotional teams must be at least 21 years old.
- 04 Commercial communication may not employ cartoons, characters (either real or fictional including cartoon figures and celebrities), animals, icons, music or other elements which are intended to have unique appeal to persons under the legal drinking age.
- 05 Commercial communication may only be placed in print, radio or television, on any form of digital media including the internet, or in text messaging where at least 70% of the audience is reasonably expected to be of legal drinking age (or 18 if no legal drinking age). 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.

Responsible drinking

- 06 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.

- 07 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.
- 08 Commercial communication may not present refusal, abstinence or moderate alcohol consumption in a negative light.
- 09 Commercial communication may not depict or suggest alcohol consumption before or during activities which, for safety reasons, require a high degree of alertness, judgment, precision or co-ordination.
- 10 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.

Alcohol content

- 11 Commercial communication may not encourage choice of a brand by emphasising its higher alcohol strength or the intoxicating effect of alcohol generally. Factual information regarding a brand's alcohol content is acceptable on product labels where permitted by law.
- 12 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.

Health aspects

- 13 Commercial communication may not depict or include pregnant women or promote consumption of alcohol during pregnancy.
- 14 Commercial communication may not claim that alcohol has curative qualities, nor offer it expressly as a stimulant, sedative or tranquilliser.
- 15 Commercial communication may not suggest that alcohol beverages 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 the SABMiller plc Alcohol Policy and Legal departments is also permissible.

Violence and anti-social behaviour

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

Social/sexual success

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

Brand promotions; promotional and display items

- 20 No brand promotions may be directed to persons under the legal drinking age (or, in countries without a legal drinking age, to persons under the age of 18).
- 21 All promotions and promotional materials must follow cultural standards of good taste, and not encourage irresponsible consumption of alcohol. No games that require drinking alcohol as an element of the game are allowed. Attendees should be encouraged to assume personal responsibility for their decision whether to drink alcohol.
- 22 Alcohol beverages must 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.
- 23 All brand promotion materials with company or brand logos must comply with the other provisions of this Code. Promotional items will not be of primary appeal to persons under the legal drinking age (e.g. children's toys) or, in countries without a legal drinking age, to persons under the age of 18.
- 24 Retail displays may not be merchandised with items that are intended to have unique appeal to underage people.

Responsibility message

25 Where none is mandated by law, a clearly visible responsibility message must be included in all commercial communication wherever appropriate. With respect to packaging, a responsibility message must be included on product labels. The inclusion of responsibility messages on packaging must occur at the first available package change-over in the ordinary course of business, but no longer than one year after adoption of this Policy.

Websites

26 All company brand websites that serve marketing purposes must include exact, full date of birth confirmation on the landing page of the website to ensure only visitors above legal drinking age (or, in countries without a legal drinking age, persons over the age of 18) enter the website. Additional age confirmation prompts should be located within sections of the website where consumers can purchase merchandise or use downloads, 'send-a-friend' e-cards, or other tools, and the website should be able to support parental control software (for example Nanny Tags). Visitors younger than the legal drinking age (or, in countries without a legal drinking age, persons under the age of 18) must be redirected from the landing page to an appropriate local social aspect website intended for underage people. In countries where technology is available to verify consumer data against government databases, companies must consider implementing such technology.

27 All company brand websites must show a link to www.talkingalcohol.com or to the local version of that website.

Brand names

28 Brand names and any corresponding packaging, labels and internet domain names may not use disparaging colloquial names (e.g. 'alcopop'), convey sexual innuendo, or use terms typically associated with intoxication or irresponsible consumption.

Brand sponsorship

- 29 Brand sponsorship for the purpose of the Code means any commercial agreement by which a SABMiller Group company contractually provides financing or other support in order to establish an association between the company's brands and a sponsorship property (e.g. sport, music, community event) for the granting of certain agreed direct or indirect rights or benefits.
- 30 SABMiller Group companies may not engage in sponsorship agreements unless at least 70% of the audience for the event (meaning those primarily attending the event and the audience for broadcast media coverage of the event) are reasonably expected to be over the legal drinking age (or, in countries without a legal drinking age, be 18 years of age or older).
- 31 SABMiller Group companies may not engage in sponsorship agreements unless the internal Sales and Marketing Compliance Committee approves the nature and elements of the sponsorship proposal.
- 32 The Code applies to the overall sponsorship agreement, including any sponsored event material carrying company or brand logos, for the duration of the sponsorship agreement. Sponsorship items will not be of primary appeal to persons under the legal drinking age (e.g. children's toys) or, in countries without a legal drinking age, to persons under the age of 18.
- 33 General sport or music sponsorships featuring brand logos are acceptable as long as there is no suggestion in the commercial communication that alcohol consumption contributes to athletic or musician success.

Section B: Oversight and enforcement

This section of the Policy on Commercial Communication provides SABMiller Group companies with consistent minimum standards for the oversight and enforcement of the Code of Commercial Communication ('the Code').

Sales and Marketing Compliance Committee

1. All SABMiller Group companies must have an internal Sales and Marketing Compliance Committee (SMCC) that is charged with ensuring all commercial communication complies with the Code. The Managing Director is responsible for appointing the SMCC chairperson.
2. The SMCC must not be chaired by an employee from 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 from the marketing and/or sales departments. Employees from other divisions may serve on the SMCC based on their overall reputation for good judgment, awareness of cultural diversity or relevant experience.
3. In the event the SMCC is unable to reach consensus on whether a commercial communication complies with the Code, the SMCC chair shall appeal to the Managing Director, who shall act as the final arbitrator after considering the conflicting viewpoints.

Education

4. The SMCC is charged with providing internal and external marketing and sales personnel with a copy of the Code on an annual basis. New marketing and sales employees or agencies shall receive a copy of 'the Code' as part of the induction programme.
5. The SMCC is charged with overseeing and ensuring implementation of training related to the Code, which shall be conducted on an annual basis.
6. The Code must be a component of the 'Marketing and Sales Ways of Working'.

Reporting

7. All SABMiller Group companies shall conduct a self-assessment of their compliance with this Policy in accordance with the 'SABMiller Sustainable Development Self-Assessment Matrix'.

Section C: Additional resources

1. The Way to Win with Licence to Trade
2. Market Research Policy
3. Employee Alcohol Policy
4. Product Portfolio Policy
5. Guidelines:
 - a. Policy on Commercial Communication: Guidance Notes
 - b. Alcohol Responsibility Messaging Guidelines
 - c. Operation of Sales and Marketing Compliance Committees (SMCC): Guidance Notes
 - d. Media Placement Compliance Guidelines
 - e. Social Media Guidelines for Commercial Communication
6. SABMiller Position Papers
7. Training materials:
 - a. Alcohol, Behaviour and Communication training
 - b. Alcohol Intelligence Quotient training
 - c. POCC reaccreditation e-learning

Contact

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