



**We are advocates of
responsible alcohol
consumption**

**Also in our corporate
communications**

Responsible Communication
and Marketing Code



Royal Swinkels

Foreword

Peer Swinkels, ceo Royal Swinkels Holding

We brew our beers with passion and pride, and we want the world to enjoy our beers now and for generations to come. As a brewer and family business, it is our responsibility to contribute to responsible alcohol consumption.

It is crucial for the reputation of our business and our brands that we sell our beers in a responsible manner. Society expects this from us, as do the future generations of our family of beer brewers.

Therefore it's essential that we run responsible alcohol marketing campaigns and that you, as employees, partners and agencies, understand what Royal Swinkels means by this. We also need to ensure we are clear and consistent in all of our communications.

Royal Swinkels' Responsible Marketing and Communication Code applies to all marketing, sales, promotion and communication activities. It applies to both traditional and digital media, as well as in-store promotions and events. You must use this code in line with local legislation and agreements for alcoholic beverages and this outlines the minimum standards that our campaigns worldwide must comply with.

Kind regards,

A handwritten signature in black ink, appearing to read 'P. Swinkels', with a horizontal line underneath.

Peer Swinkels

Introduction

For centuries, beer has been part of social gatherings around the world.

However alcohol, and therefore beer, is not suitable at certain times, in certain places and for certain people. The negative health effects of excessive alcohol consumption are becoming increasingly apparent. In particular, young people run an increased risk because their bodies are still developing. The local legal age limit is therefore an important starting point within our vision of responsible alcohol consumption.

For countries where no regulations are in place, we apply the minimum age of 18 years. The code serves as a reference for all local commercial communication and must be used as a minimum.

General rules

It is your responsibility to ensure that all forms of communication involving the Royal Swinkels company and brands must:

- Comply with local legislation and any applicable guidelines.
- Be honest, ethical and truthful.
- Be socially responsible.
- Be sensitive to cultural differences between markets.

The scope of this Code

The Code applies to all forms of marketing/promotion/communication for all Royal Swinkels' brands and products. Think of:

- Advertising (ATL, BTL, websites);
- Social media;
- Sponsorship (events, branded content, product placement, billboards, ambassadors/ celebrities/ influencers);
- Events and promotions;
- Relationship marketing;
- PR;
- Branding/packaging;
- POS/merchandise;
- Media buying.

The Code does not apply to the use of our brands in third party communications we have not approved or support for example non-sponsored use in films, TV shows or events.

What do we mean by 'Responsible Consumption'?

1. We should never depict situations in which beer is, or has been, consumed excessively or irresponsibly. We should also never suggest that these situations are acceptable.
2. We should never suggest abstinence or drinking in moderation in a negative way. We should always respect someone's choice not to drink.
3. Our marketing materials for alcoholic beers should never include images of pregnant women drinking our beer, be aimed at pregnant women or suggest that drinking during pregnancy is acceptable.
4. In our advertising, actors must never behave violently or excessively.
5. All advertising must avoid any association with drugs or drug culture.
6. Promotional activities sponsored by Royal Swinkels

should not encourage consumption that can be deemed irresponsible in any way.

- a. People should never be pressured into participating in our promotional activities.
 - b. Our marketing materials and promotional activities should never include and/or promote drinking games or use glasses, inhalers or other drink dispensing mechanisms where the consumer has no control over the consumption of the alcohol, or the amount of alcohol is excessive.
7. There must be no link between the consumption of alcohol and active participation in driving or traffic related situation.
 8. We must never permit the use of our products or property if we believe that a person's alcohol consumption is inappropriate, legal or responsible.
 9. In order to avoid that our brands are associated with overconsumption we should always limit the sponsorship of events with an open bar to events where responsible consumption of our beers are guaranteed (and where our beers are only available to those who have reached the minimum age for alcohol).

At events organised by Royal Swinkels we should always propose non-alcoholic alternatives. For any events not organised by Royal Swinkels, we highly recommend that non-alcoholic alternatives are also available or offered.

The legal age

The minimum age for buying and consuming alcohol is set by law. Even in countries where no minimum has been set, Royal Swinkels must never focus its activities and communications to persons under the age of 18.

We must adhere to the following principles:

- Never use symbols, images, objects, cartoon characters, celebrities, music or language intended to address or that may be attractive to children or young people.
- All actors and models who drink alcohol and/or promote our beers in marketing materials must be at least 25 years old and must not look younger than 25.
- Well known spokespersons as well as individuals and teams involved in the promotion of our brands in the hospitality industry must be at least 18 years of age and look like someone of at least 18 years old.
- To ensure our advertising and communications isn't be aimed at young people under the legal minimum age, we must ensure that all marketing materials in (traditional and digital) and media is placed where at least 75% of the audience is of legal drinking age.
- We should work extremely closely with our agencies, media buyers and other representatives to accurately predict and ensure that at least 75% of the target audience will be older than the legal age to drink alcohol. In addition, we must never advertise before, during and after TV shows that conflict with responsible alcohol consumption, or show negative consequences of alcohol.
- Advertising may be placed on websites where at least 75% of the visitors are of legal age to drink alcohol or on websites where the dissemination of the message is limited to registered users of that website who have reached the legal age to drink alcohol based on the personal profiles.
- All Royal Swinkels websites must use age verification mechanisms to deny access to persons who are not yet of legal drinking age.

- We must never sponsor or focus our marketing activities on events where more than 25% of the public is expected not to have reached the legal age for alcohol consumption.
- For paid street media campaigns, we must take all reasonable steps to ensure that our ads are not placed in the vicinity of sensitive places or buildings including primary or secondary schools, places of worship, rehab clinics, or public playgrounds.
- Do not allow the trademarks or logos of our brands to be licensed for use on materials or articles intended primarily for persons below the legal drinking age, such as toys or children's clothing.
- It is essential that we take all reasonable steps, including ID verification, to ensure that Royal Swinkels, or partner, sponsored promotions do not allow anyone under the legal drinking age to participate in tastings, sampling or focus groups. Our promotional staff must be fully trained to request proof of age and instructed to refuse to serve alcohol to anyone under the legal minimum age.

Product placement

For product placements, we do must never allow our products or properties to be used if we are of the opinion that:

- a. It is an image of someone who has not yet reached the legal age to drink alcohol.
- b. The film or TV show is intended for an audience of which it is reasonably expected that at least 75% have not yet reached the legal age to drink alcohol.

High Risk activities

- We must ensure that any marketing materials or promotional activities will not promote alcohol consumption during or as part of high-risk activities (or in high-risk locations), such as driving a motor vehicle, operating other, potentially dangerous, vehicles, devices or machines. We must comply with the legislation of the country in which particular communications are carried out.
- Success in a high risk activity should never be suggested as dependent on the consumption of our beer.
- If the consumption of non-alcoholic beer does not pose an increased risk in these type of activities, it can be present in our advertising. In this case, we must ensure that the absence of alcohol is clearly indicated, so that the product cannot be confused with an alcoholic beer.

Health or functional properties

- We should never make the claim that our products can prevent, treat or cure medical conditions.
- We should not promote our products based primarily on the claim that they offer certain health benefits, but we can positively highlight the absence of alcohol in appropriate products within our non-alcoholic range.
- All marketing materials and promotional activities should not create confusion with regards to the alcohol content of our products.
- It is essential to always comply with the legislation of the country in which particular communications are carried out. For global campaigns, we will consider using the strictest standard as we see fit.

Performance or success

Responsible beer consumption is associated with pleasant social experiences and social ties and can be presented as such. However, when promoting our brands, we should always take the following into account:

- a. Commercial communication should never suggest or imply that the consumption of beer is a prerequisite for social acceptance, neither for professional or financial success or positive learning outcomes.
- b. Commercial communication should never suggest or imply that the consumption of our products increases sexual performance or attractiveness.
- c. Commercial communications should never suggest, imply or give the impression that there is a connection between the consumption of our products and success/performance in sports or high-risk activities.

Digital media

We see digital media as an important channel for our communications. By digital media, we mean:

- Websites under the control of Royal Swinkels;
- Paid search results;
- Display ads (moving and non-moving);
- E-mail;
- SMS and MMS messages on mobile devices;
- Advertising in computer games;
- User-generated content (UGC) under the control of Royal Swinkels;
- Viral advertising under the control of Royal Swinkels;
- Pages or channels of the company and the brands on social media, including Facebook, Instagram, LinkedIn, Pinterest, X, YouTube, etc.;
- Downloadable applications (apps).

We must take a responsible approach to our digital communication activities in order to ensure that we do not sell our products to persons under the legal age to drink alcohol.

- All websites of the Royal Swinkels company and its brands must always include an age verification mechanism. These websites must always contain messages about responsible consumption.
- User-generated content (UGC) created by consumers can be placed on forums, blogs, websites where videos/photos are shared, social networking sites or other interactive websites. When the content is placed on channels we control (websites of the company Royal Swinkels and its brands), we must ensure that content is monitored and remove any inappropriate content within 48 hours of posting.
- E-mails should never be sent to persons who have not yet reached the legal age for the consumption of alcohol.

Use of data

We follow strict rules regarding the use of consumers' online data for marketing purposes and we must encourage consumers to read our data protection statements.

- a. All forms of relationship marketing used by Royal Swinkels must be based on permission. This means that, in connection with marketing, we should always ask the recipients of e-mails and text messages to choose to receive such messages. In addition, we must always offer an opt-out function that allows consumers to no longer receive communication from us.
- b. On the various platforms where Royal Swinkels may collect data for relationship marketing purposes, we must inform users about how the information will be used and offer consumers the opportunity not to opt for data processing. We must always ensure a reasonable level of security and limited storage of the information collected in accordance with applicable laws and regulations.
- c. If we or third parties acting on our behalf collect 'clickstream' data in order to advertise to users of our website based on surfing behaviour, we should always point this out to users and give them the opportunity not to engage in such practices.

Non-alcoholic beers

We should always apply the following provisions to our non-alcoholic beers that bear a beer brand name:

Don'ts

- Do not depict people who have not yet reached the legal age to drink alcohol.
- Do not allow the trademarks or logos of non-alcoholic beer products to be licensed for use on materials or articles intended for persons who have not yet reached the legal age to drink alcohol.
- Do not include celebrities, actors or models who have not yet reached the age of 18 in any of our communication.
- Do not sponsor or focus our marketing activities on events/schools where the majority of the public is expected not to have reached the legal age for alcohol consumption.

Do's

- We can make reasonably well-founded, and proven claims about health or functional benefits of nonalcoholic beer products on the condition that the product is clearly recognisable as non-alcoholic. Claims should be checked with our QA department.
- We could reach out to motorists by, for example, advertising along the motorway with a claim such as 'Don't drink & drive', provided the message very clearly includes a 0.0 product visual and the 0.0 logo.
- With non-alcoholic beer we can target pregnant women and depict pregnant women provided that there is no possible confusion that the beer is non-alcoholic and that the advertisement also clearly contains the 0.0 logo.

Compliance with the Code

Compliance with the Code is mandatory for all Royal Swinkels employees, partners, distributors, agencies and third parties. Where national legislation or selfregulatory codes exist, they must, of course, also be respected.

In order to ensure practical compliance, the following will apply:

- All Marketing and Sales teams should know and respect this Responsible Marketing and Communications Code.
- All marketing/communication/event agencies must be informed of the Code. The responsibility for this lies with marketing/brand management.
- Marketing/Sales is ultimately responsible for the actions and campaigns they carry out. Don't hesitate to ask the Global Communications department for advice when developing an idea for promotion or communication.

