



Policy on Commercial Communication
July 2008



Contents

This Policy on Commercial Communication applies to all SABMiller Group companies. This Policy contains two sections:

Section A: Code of Commercial Communication

Basic Principles	4
Preventing Underage Appeal	5
Responsible Drinking	6
Alcohol Content	6
Performance	7
Health Aspects	7
Violence and Anti-Social Behaviour	8
Social/Sexual Success	8
Promotions; Promotional and Display Items	8
Responsibility Message	9
Websites	9
Brand Names	9

Section B: Operation and Enforcement of the Code of Commercial Communication.

Sales and Marketing Compliance Committee	12
Education	13
Reporting	13



Section A

Code of Commercial Communication

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 advertising in all media (including the internet and text messaging), packaging, promotions, product placement, merchandising, sponsorship, and research.

“Commercial communication” does not include communication devoted exclusively to preventing the irresponsible consumption of alcohol; press releases; 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
- 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 three years older than the minimum legal drinking age for that country. If a country does not have a minimum drinking age paid actors or models must be at least 21 years of age.
- 04 Commercial communication may not employ cartoons, characters, icons, 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 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 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.

Responsible Drinking

- 06 Commercial communication may not depict 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 alcohol consumption before or during activities which, for safety reasons, require a high degree of alertness, judgement, precision, or coordination.

Alcohol Content

- 10 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.

Performance

11 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. General sports sponsorships that feature brand logos are acceptable as long as there is no suggestion that alcohol consumption contributes to athletic success.

Health Aspects

- 12 Commercial communication may not depict or include pregnant women.
- 13 Commercial communication may not claim that alcohol has curative qualities, nor offer it expressly as a stimulant, sedative, or tranquiliser.
- 14 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.

Violence and Anti-Social Behaviour

- 15 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

- 16 Commercial communication may not imply that alcohol beverage consumption is essential to business, academic, sporting or social success.
- 17 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.
- 18 Apparel should be appropriate to the overall context of the commercial communication.

Promotions; Promotional and Display Items

- 19 No promotions may be directed to persons under the legal drinking age.
- 20 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.
- 21 Alcohol beverages must not be supplied to visibly intoxicated persons. Servers must be trained, preferably with a certified program if available. Water and soft drinks must be available; food is recommended.

22 All sponsored event 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).

23 Retail displays may not be merchandised with items that are intended to have unique appeal to underage people.

Responsibility Message

24 Where none is mandated by law, a 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.

Websites

25 All company brand websites that serve marketing purposes must include date of birth confirmation at the entrance to the website. Additional age confirmation prompts should be located within sections of the website where consumers can purchase merchandise.

Brand Names

26 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.



Section B

**Operation and Enforcement of the
Code of Commercial Communication**

Section B

Operation and Enforcement of the Code of Commercial Communication

The Operation and Enforcement provisions of the Policy on Commercial Communication provide SABMiller companies with consistent, minimum standards for the oversight and enforcement of the Code of Commercial Communication (the “Code”).

Sales and Marketing Compliance Committee

- 01 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.
- 02 The SMCC must not be chaired by an employee in 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. Employees from other divisions may serve on the SMCC based on their overall reputation for good judgement, cultural diversity, or relevant experience.
- 03 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

- 04 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.
- 05 The SMCC is charged with overseeing training related to the Code, which shall be conducted on an annual basis.
- 06 The Code must be a component of the Marketing and Sales Ways of Working.

Reporting

- 07 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.

