

CAMPARI GROUP

**CODE ON
COMMERCIAL
COMMUNICATION**

TOASTING LIFE TOGETHER

TABLE OF CONTENTS

01	Introduction	3
	CEO Statement	4
	Campari Group's Commitment	5
	Commercial Communication	6
02	Principles and Practices	7
	Abuse and Misuse	8
	Alcoholic Beverages and Young People	9
	Illegal or Hazardous Activities	10
	Alcohol Content	11
	Alcoholic Beverages and Health Aspects	12
	Responsible Drinking Messages	13
	Representatives and Promoters	14
	Sponsorships, Events and Promotional Activities	15
03	Digital Commercial Communication	16
	Specific Guidelines for Digital Marketing	17
04	Internal Approval	20
	Process and Responsibilities	21
05	Appendix	22

RODUCTION
INTRODUCTION
INTRODUCTION
RODUCTION

01

INTRODUCTION

01

01
Introduction02
Principles
and Practices03
Digital Commercial
Communication04
Internal
Approval05
Appendix

CEO Statement

“At Campari Group, we are committed to responsible marketing of our alcoholic products to adults and to encouraging responsible drinking worldwide, in our traditional convivial way, playing our part in combating harmful and irresponsible drinking.

While the Group’s growing global presence brings great opportunities, it also comes with challenges and responsibilities, including our need to deliver a clear and consistent message from our portfolio of brands. We will continue to place the emphasis on our brands’ cultural heritage, convivial style, and responsible consumption in our Commercial Communication. For this reason, we are strongly committed to the principle that the Commercial Communication of all our brands conveys dignity, decency, honesty, and responsible business practices. It is also in the way we communicate that we build more value together”.

Bob Kunze-Concewitz



Bob Kunze-Concewitz
Campari Group Chief Executive Officer



Campari Group's Commitment

Campari Group takes its commitment to the responsible marketing and sales of its products very seriously. Commercial Communication (when marketing, promoting, and communicating about Campari Group brands and all third-parties' distributed products) shall always maintain a high level of corporate integrity, business ethics, and social responsibility. In this regard, Campari Group condemns and will never promote any kind of fraudulent, harassing, threatening, violent, bullying, sexually explicit, obscene, racist, sexist, intimidating, defamatory, discriminatory, or otherwise offensive Commercial Communication.

Campari Group recognizes that excessive or irresponsible consumption of alcoholic beverages may have personal, social, or health consequences. The purpose of this Code on Commercial Communication ("Code") is to ensure that Campari Group's Commercial Communication shall not encourage, depict, or condone the abuse or misuse of alcohol, including excessive consumption or underage drinking.

To this end, all employees ("Camparistas") involved in marketing, trade marketing and sales activities and all external marketing business partners – e.g. external agencies, freelancers, contractors, promoters and ambassadors – have to countersign this Code and undertake relevant training where possible.

In the case of conflict between the provisions of this Code and any relevant national codes and rules, then the national codes and rules must be followed. If this Code imposes stricter requirements than those imposed nationally, then this Code prevails.

01 Introduction

02
Principles
and Practices

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix

01

Commercial Communication

Commercial Communication is defined as: “all brand advertising, marketing, promotion activities and other communications to consumers regardless of the medium used” (owned properties and activation, online and offline, such as website and social media, TV, cinema, packaging, label, print, radio, out of home, brand press releases, sponsorship, etc.). Cocktail names and recipes also fall within the definition.

This definition does not extend indiscriminately to every type of commercial or corporate communication. For instance, it does not include independent editorial content, information in annual reports and the like, or corporate public messages in press releases or statements to the media.

In case of any media/press inquiries the local PR representative or Campari Group Corporate Communications will provide support and explain the current Media Guidelines posted on Campari Group’s Sharepoint.

01
Introduction**02**
Principles
and Practices**03**
Digital Commercial
Communication**04**
Internal
Approval**05**
Appendix

NCIPLES AND
PRACTICES PR
PRINCIPLES AN
PRACTICES

02

**PRINCIPLES AND
PRACTICES**

02

Abuse and Misuse

Commercial Communication shall never depict situations suggesting either an unhealthy attachment or an addiction to alcohol, or the belief that resorting to alcohol can solve personal problems. Commercial Communication shall never lead the public to believe that the consumption of alcoholic beverages contributes to mental, physical or sexual prowess or status, or that not consuming alcohol leads to physical, psychological, or social inferiority.

Commercial Communication shall never encourage the excessive or inappropriate consumption of alcoholic beverages, and it shall never depict sobriety, moderation, or abstemiousness as a negative value or behaviour.

Commercial Communication of alcoholic beverages shall not show, portray, or be directed towards pregnant women.

01
Introduction

02
**Principles
and Practices**

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix



- 01 Introduction
- 02 Principles and Practices**
- 03 Digital Commercial Communication
- 04 Internal Approval
- 05 Appendix

Alcoholic Beverages and Young People

Commercial Communication of alcoholic beverages shall not target, primarily appeal to, refer to or depict minors, even if implicitly. “Minors” are those young people who are not of Legal Drinking Age¹ (LDA) in the country where the Commercial Communication is launched. On all types of media (e.g. TV, radio, newspaper, magazine, out of home, social media and website), Campari Group’s alcoholic brands shall only be advertised when at least 70%² of the audience is reasonably expected to be adults (i.e. above the LDA). In other words, Commercial Communication shall not promote Campari Group’s alcoholic brands in media where more than 30% of the audience is known or reasonably expected to be minors. A reasonable expectation shall be determined by reliable audience composition data where available. Furthermore, with regards to social media contents, when possible (e.g. paid social contents) all available technologies shall be used to only target users that are above the LDA when promoting alcoholic beverages.

Commercial Communication of alcoholic brands shall only feature models, testimonials, celebrities, bloggers, influencers, and actors who are at least 25 years of age. Commercial Communication of alcoholic beverages shall not use elements of appeal such as objects, images, symbols, gestures, language, music and characters (either real or fictitious, including cartoon figures), celebrities, testimonials, models, actors, bloggers, and influencers who are especially attractive to minors.

Commercial Communication of alcoholic beverages also shall not use brand identifications such as names, logos, games, game equipment or other items that primarily appeal to minors. Campari Group will not license its brand names, logos, or trademarks on materials intended for use primarily by persons younger than the legal drinking age (e.g. children’s clothing sizes, toys, or games associated primarily with children).

¹ For this Code, the Legal Drinking Age (LDA) is the minimum age to drink alcohol in the relevant local jurisdiction. Should no local LDA exist, 18 years of age should be used.
² This is the general rule, but different thresholds may be applied according to local requirements.

02

Illegal or Hazardous Activities

Commercial Communication shall avoid any association with or acceptance of illegal, indecent, or anti-social activities. Commercial Communication shall not suggest that the consumption of alcoholic beverages is acceptable before or during activities that require a high degree of alertness or coordination, such as driving, operating potentially hazardous machinery, or while engaging in potentially dangerous activities.

Commercial Communication of alcoholic beverages shall not encourage consumers, tacitly or otherwise, not to comply with the legal limits related to drinking and driving.



01
Introduction

02
**Principles
and Practices**

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix

02

Alcohol Content

Commercial Communication may refer to the alcohol content in a straightforward and factual manner but shall never promote the alcoholic strength of Campari Group's brands.

01
Introduction

02
Principles
and Practices

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix





01
Introduction

02
**Principles
and Practices**

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix

Alcoholic Beverages and Health Aspects

Commercial Communication shall not claim that the consumption of alcoholic beverages may have therapeutic benefits or any curative effect. The concepts of therapeutic benefits and curative effects include improvements in energy, endurance, virility, mental ability, psychological condition, performance, skills, or strength.

Campari Group will never imply that drinking alcohol leads to any health or functional benefits, nor that alcohol may play a role in managing weight or as part of a fitness regime. Commercial Communication shall not imply or mislead that alcoholic beverages have nutritional properties or may be consumed alternatively to food.

Campari Group will not market its alcoholic brands as energy drinks, nor imply that consuming them (either alone or with a specific mixer) delivers energy or endurance benefits.

Campari Group will not market its alcoholic brands as thirst quenching or hydrating, nor imply or suggest that they could be consumed instead of non-alcoholic beverages.

02

01
Introduction

02
**Principles
and Practices**

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix

Responsible Drinking Messages

Campari Group promotes the responsible consumption of its alcoholic beverages and undertakes to include Responsible Drinking Messages (“RDMs”) on all its Commercial Communication, including digital marketing and social media communications. The placement and size of the RDM must be clearly visible, noticeable, and legible to consumers and it should also be included in the social profile of all alcoholic brands.

RDMs are also applied on Point Of Sale (“POS”) materials that have a direct correlation with the product and that can be contextually visible/usable by consumers (e.g. not on the technical tools used by bartenders), as long as the size of the item or other technical characteristics allow for a legible message.

All Campari Group’s alcoholic products shall include a message on the label advising against drinking while pregnant. Whereas specific countries would request further information to consumers with regard to RDMs, these would be evaluated on a case-by-case basis together with the Global Public Affairs & Sustainability Function.



02

01
Introduction

02
Principles
and Practices

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix

Representatives and Promoters

Commercial Communication shall never associate Campari Group's brands with individuals (real or fictional, e.g. actors, models, testimonials, celebrities, bloggers and influencers) who have known past or current issues with the misuse or abuse of alcohol. Further, any such individual must also not have a history of illegal, violent, offensive, or unethical conduct.

Prior to selecting an individual such as an actor, model, blogger, influencer, or celebrity, to promote one or more of Campari Group's brands, his or her background shall be checked to ensure his or her representation of Campari Group's brands shall not be potentially damaging to Campari Group's reputation.

In addition, at least 70% of an Influencer's followers must be reasonably expected to be above the LDA as determined by reliable audience composition data where available.



02

01
Introduction

02
Principles
and Practices

03
Digital Commercial
Communication

04
Internal
Approval

05
Appendix

Sponsorships, Events and Promotional Activities

Campari Group agrees that Commercial Communication for alcoholic beverages can take place at events, sponsorships, or promotional activities that are primarily for adults (i.e. where at least 70% of the spectators/participants are reasonably expected to be above the LDA).

For clarity, an adult-oriented cultural or sports event – meeting the 70% threshold (e.g. city orchestra or opera) – may be sponsored even if a small number of the performers are under the LDA. Campari Group will not sponsor junior sports teams or leagues or junior cultural events, such as musical/talent contests or awards primarily for people under the LDA.

In addition, sponsorships must not suggest that players/performers consume alcohol before or while performing, or that alcohol consumption enhances performance in any way. For any event where sampling is conducted, appropriate measures are employed to ensure the legality of the event and safeguard against under-age drinking.





01
Introduction

02
Principles
and Practices

03
**Digital Commercial
Communication**

04
Internal
Approval

05
Appendix

Specific Guidelines for Digital Marketing

› AGE AFFIRMATION PROCESS

All landing pages for alcoholic brand websites shall restrict access to anyone under the LDA for that locality. This shall occur through an age affirmation process³.

If a user enters a date of birth that indicates he/she is under the LDA according to the local regulation, access to an alcoholic brand website shall be denied and visitor shall be given an appropriate RDM and be redirected to an information website on responsible drinking (e.g. responsibledrinking.eu, responsibility.org, or other site as locally determined to be most relevant). With regard to social media platforms, Campari Group would rather communicate through social media with an age-gating mechanism integrated on the platform; otherwise, Campari Group's alcoholic brands shall be advertised on social media platforms where at least 70% of the audience is reasonably expected to be above the LDA. In any case, due to their peculiarities, social media contents that promotes alcoholic beverages shall only target users above the LDA when feasible (e.g. paid social contents).

Moreover, RDMs shall be provided in the bio of the alcoholic brand's social media profile and a message shall also be included stating that the contents published in such platforms shall not be shared or forwarded to individuals below the LDA.

› USER GENERATED CONTENT

User Generated Content ("UGC") materials (including text, pictures, photography, audio, and video) posted on social network sites, brand websites, photo or video sharing websites, blogs, and forums controlled by the Group and that do not comply with this Code, shall be, where possible, removed and shall not be reposted on the brand's social pages. In order to be reposted, any UGC must abide with the provision of this Code. Campari Group's social media pages shall have a statement saying that all inappropriate UGC will be removed from the site or web page.

³Age affirmation is a process or a mechanism by which the consumer provides country of access and/or personal information to affirm he/she is above the LDA for that country.



01
Introduction

02
Principles
and Practices

03
**Digital Commercial
Communication**

04
Internal
Approval

05
Appendix

› **INFLUENCER GENERATED CONTENT**

As for all representatives and promoters, all influencers' background shall be checked to ensure they don't damage the reputation of Campari Group by having known past or current issues with the misuse or abuse of alcohol, nor any history of illegal, violent, offensive, or unethical conduct. For all Influencer Generated Contents, influencers shall have a written agreement with Campari Group or its agency.

By accepting the collaboration with Campari Group, influencers accept the core principles expressed in this Code; they will also be provided with a DOs and DON'Ts manual available in the Appendix of this Code.

Every influencer generated content (e.g. posts or Instagram stories) related to alcoholic beverages and promoted by Campari Group, must include RDMs (e.g. hashtag #drinkresponsibly). Influencers must also be truthful and transparent about their association with Campari Group in their posts. Influencers' posts and contents must be monitored for compliance with this Code and influencers must fix or remove non-compliant contents within 48 hours from notification by Campari Group or entitled agencies to act on its behalf. Should influencers not address issues within 48 hours of notification, or repeatedly post non-compliant materials, Campari Group will be free to terminate the commercial relationship with them.

› **BRAND WEBSITES CONTENT**

The establishment of and the final content for brand websites, microsites, or other media sites and pages (such as Facebook, Twitter, Instagram, LinkedIn, Weibo, etc.) must comply with this Code.

Content, by Campari Group and UGC, shall be reviewed on a regular basis to ensure compliance with this Code. Only authorized Camparistas and representatives shall be allowed to post comments on behalf of Campari Group.

Campari Group posts shall be transparent that they are posted by Campari Group and shall comply with this Code, as well as all Laws, Regulations, Guidelines, Codes and Campari Group's Spokesperson & Media Guidelines.

› **PRIVATE SOCIAL MEDIA GUIDELINES**

A set of recommendations regarding the management of Camparistas' private social media accounts, the Campari Group Private Social Media Guidelines, are available on MyCampari (Corporate Assets → Corporate Communications Guidelines).



01
Introduction

02
Principles
and Practices

03
**Digital Commercial
Communication**

04
Internal
Approval

05
Appendix

› PRIVACY POLICIES

Privacy policies govern the collection of personal information from adults above the legal age according to national laws and encompass any direct digital marketing or advertising whether conducted through a social networking site, website or other digital channel and must ensure the following:

- Prior to the collection of any information, the brand advertiser will require that individual to affirm that he/she is above the legal age according to national laws and user information can only be collected from those individuals who are above the legal age.
- The brand advertiser shall employ a mechanism for a user to “opt-in” before receiving a direct digital marketing communication and to “opt-out” to discontinue receiving such direct communications.
- Clear information must be provided about collection and use of personal data and the collection of handling of said data must adhere to the General Data Protection Regulation – GDPR – as introduced in the European Union on May 25, 2018.
- Under no circumstances will the information collected be sold or shared with third parties unrelated to the brand advertiser without first obtaining express consent.
- Users should be encouraged to read the privacy statement before submitting their information.
- Measures will be taken to keep user information secure and protected from loss or theft.

For any further information, reference should be made to Campari Group’s Data Protection Officer (gdpd.office@campari.com).

- 01 Introduction
- 02 Principles and Practices
- 03 Digital Commercial Communication
- 04 Internal Approval**
- 05 Appendix

Process and Responsibilities

Responsibility for compliance with this Code resides with each and every Camparista who should ensure that all Commercial Communication and sponsorships promoted in their respective markets comply not only with the local laws and industry self-regulation rules, but also with this Code. It is however acknowledged that in the digital era Commercial Communication often travels across borders and its impact on the public needs to be evaluated from a broader viewpoint than solely that of its intended market of destination. The Code seeks to prevent any Commercial Communication from being considered offensive or improper by consumers in other markets where Campari Group operates.

All individuals involved with Commercial Communications, including agencies and other external groups that work with Campari, shall be briefed on the Code from the outset of their engagement so that all Commercial Communication materials created and deployed are compliant. Although final responsibility for Code compliance rests with the Marketing function, **all new campaigns, product launches, brand manuals, and Above-the-Line (“ATL”) materials must be submitted to Legal for an additional level of review.** ATL materials include traditional broadcast, digital video, product placements, sponsorships, and PR. The Legal & Compliance function will review both compliance with laws and regulations as well as compliance with the Code.

The Legal & Compliance function together with the Marketing function will, in turn, engage the Internal Approval Code Committee (“Committee”) through the email address committee@campari.com, when any ambiguity or question regarding the campaign transcending the specific legal evaluation is detected. The Committee is composed of representatives of the Group Strategic Marketing, Corporate Legal & Compliance, Public Affairs & Sustainability, and Corporate Communications functions.

The Committee decisions shall be final and binding.

APPENDIX

APPENDIX APPEN

APPENDIX

APPENDIX

05

APPENDIX

- 01 Introduction
- 02 Principles and Practices
- 03 Digital Commercial Communication
- 04 Internal Approval
- 05 Appendix**

Appendix

DOs and DON'Ts for Influencer Generated Contents

Guidelines on Influencer Generated Contents to be shared with Influencers prior to any collaboration (e.g. promotional posts, events attendance, “live” content such as Instagram stories or live session with followers, etc.)

DO

- Promote Campari Group’s brands while enhancing conviviality and encouraging people to celebrate life in a positive and responsible way (e.g. accompany alcoholic beverages with food).
- When possible (e.g. paid social contents), use all available technologies to only target followers that are over the Legal Drinking Age (“LDA”)⁴ when promoting alcoholic beverages.
- Include visible Responsible Drinking Messages in the contents created (e.g. #drinkresponsibly) when promoting alcoholic beverages.
- Adequately and clearly disclose the nature of collaboration with the promoted brand (e.g. disclosure statement or #adv in case of a monetary payment, #gifted in case of gifts) in accordance with local legal requirements and best practices.
- Always abide by national marketing codes and regulations and promote Campari Group’s brands through decent, honest and truthful social contents.
- Fix or remove non-compliant contents within 48 hours from notification by Campari Group or entitled agencies to act on its behalf – otherwise our commercial relationship can be terminated.

DON'T

- Do not feature contents targeted, appealing or referring to individuals under the LDA when promoting alcoholic beverages (e.g. do not use imagery that primarily appeals to children such as toys, cartoons, Santa Claus, etc.).

⁴For this Code, the Legal Drinking Age (LDA) is the minimum age to drink alcohol in the relevant local jurisdiction. Should no local LDA exist, 18 years of age should be used.



- 01 Introduction
- 02 Principles and Practices
- 03 Digital Commercial Communication
- 04 Internal Approval
- 05 Appendix**

- Do not represent, encourage or endorse an excessive, inappropriate or irresponsible consumption of alcoholic beverages (e.g. drinking and driving, excessive consumption, underage drinking, consumption by pregnant women, engaging in dangerous activities, “down-in-one” consumption, drinking game, drinking as a result of a dare, etc.).
- Do not use any kind of fraudulent, harassing, threatening, discriminatory, violent, bullying, sexually explicit, obscene, racist, sexist, intimidating, defamatory or otherwise offensive language and/or tone of voice while promoting Campari Group’s brands (e.g. do not degrade the image, form or status of any person or social or ethnic group, etc.).
- Do not depict sobriety, moderation and abstemiousness as a negative value or behavior (e.g. do not make fun of individuals that abstain from drinking, etc.).
- Do not depict situations suggesting either an unhealthy attachment or an addiction to alcohol, or the belief that resorting to alcohol can solve personal problems.
- Do not lead followers into believing that the consumption of alcoholic beverages contributes to mental, physical or sexual prowess or that not consuming alcohol leads to physical, psychological or social inferiority.
- Do not suggest that alcoholic beverages may have therapeutic or nutritional properties, nor health benefits.
- Do not associate, even only indirectly, alcoholic beverages with illicit drugs, nor allude to the acceptance of such association.
- Do not reference or portray drinking in connection with illegal activities.
- Do not stress the alcoholic strength of alcoholic beverages as the main theme of the contents created.
- Do not imply that mid or lower strength alcoholic beverages may be consumed in quantities, ways or situations where higher strength alcoholic beverages may be inappropriate, nor that mid or lower strength alcoholic beverages are healthier or more responsible choices.
- Do not suggest that the consumption of alcoholic beverages is acceptable before or while driving motorvehicles of any kind, nor induce in any case not to comply with the legal limits related to drink and drive.

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