



Presence of  
**Responsible  
Drinking Messages**  
in Packaging  
and Advertising



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This report was prepared by Landmark Europe  
on behalf of SABMiller.

April 2012

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# Foreword by *Alan Clark*

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I am pleased to introduce you to our first monitoring report on one of SABMiller's key commitments to remind consumers that beer should not be consumed by people under the legal age, drivers, or pregnant women.

Placing Responsible Drinking Messages onto our packaging labels and in our marketing communications in the countries where we operate in Europe is one of our commitments to the EU Alcohol and Health Forum, of which SABMiller is a founding member.

At SABMiller, we want our consumers to enjoy our products responsibly. Beer is a low alcohol beverage, created to be nurtured and savoured and not to be abused. This is part and parcel of our successful business. We can only thrive sustainably in a society where people live a fulfilled, rewarding and healthy life. We can only grow sustainably if we build brands that resonate with the values of our consumers and society. In the last decades, personal responsibility has become a crucial value for people and society and we embrace and promote it in all our activities.

We know that most people who drink our beer do so in moderation, in relaxing and convivial settings. However, we also know that a minority drink too much, drink while under age, or drink and drive, and potentially cause harm to themselves and those around them.

We work actively across all our markets, often with health experts, NGOs and law enforcement agencies, to promote responsible drinking and combat alcohol abuse. This is why "discouraging irresponsible drinking" is the first of our 10 Sustainable Development priorities. Above all, this means providing accurate and balanced information to consumers about alcohol consumption.

Our vision of responsible consumption is supported by our Alcohol Policy Framework, which defines marketing, research and product development activities for our companies around the world. In this context, and encouraged by the Forum, we revised our policy in terms of labelling on packaging and in commercial communication in 2010, to adjust them to the changing expectations of consumers and other stakeholders.

We also decided to commit to placing Responsible Drinking Messages on our packaging and in our commercial communications in our European markets by 31 December 2011. This independently reviewed monitoring report assesses how well SABMiller and its partners have complied with this commitment.

There is more to this than simply changing labels. Our entire product portfolio had to be revised to incorporate these new instructions. Over 90 brands, and their variants, were concerned in our main European markets. Over 170 people in our companies and at our agencies spent close to 7,000 hours working only on design changes and developing new labels for over 600 packaging formats. In our breweries several hundred colleagues in production and distribution were involved in implementation. Taking into account the countries where we comply with local industry agreements or government-mandated messages, over 800 different SABMiller packaging formats carry a message today. For technical reasons, 21 formats still have to be amended to be fully compliant. This will be completed by December of 2012.

Placing messages on our products and marketing communication has become standard business practice for us and we are pleased to reach millions of consumers, reminding them that our beer is not for minors under the legal age, drivers or pregnant women.

We do not think that messages on labels resolve alcohol abuse. Our messages point to our websites where comprehensive information on various aspects of alcohol consumption is available. We are very pleased to welcome approximately 20,000 visitors on our websites monthly, engaging with the information, tools and sometimes with each other.

We believe that concerted actions by all parties who can have an impact are required to change drinking cultures that are detrimental or risky. Beyond our efforts to do the right thing in business, we are working with several organisations across Europe to contribute to reducing harm caused by alcohol abuse.

We look forward to sharing and discussing these results with other members of the Alcohol and Health Forum as well as with any other interested party.



A handwritten signature in blue ink, appearing to read 'Alan Clark'.

Alan Clark,  
*Managing Director Europe, SABMiller*  
13 April 2012

# Executive summary and key results

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SABMiller made the following voluntary commitment to the EU Alcohol and Health Forum:

***“By 31 December 2011, Responsible Drinking Messages will be developed and placed on all TV, radio, cinema, online, billboards and print (above A4) advertisements, packaging and labels, in compliance with the SABMiller responsible messaging guidelines in SABMiller’s European Operations.”***

In line with this commitment, SABMiller companies developed Responsible Drinking Messages based on their local market circumstances, inspired by three key concerns: underage people, pregnant women and drink-driving. In countries with binding regulation, industry voluntary commitment or industry/government agreement, SABMiller followed those rules.

A monitoring exercise was carried out in the second half of 2011 – before the formal entry into force of the commitment – by the following independent third parties:

- Ebiquity, to review SABMiller’s compliance with its commitment to place Responsible Drinking Messages in marketing communications.<sup>1</sup>
- KPMG, to review SABMiller’s assessment of compliance with its commitment to place Responsible Drinking Messages in labelling.<sup>2</sup>

The monitoring exercise was undertaken in a sample of SABMiller’s most important European markets: Czech Republic, Hungary, Italy, the Netherlands, Poland, Romania, Slovakia, Spain (Canary Islands), and the United Kingdom.

## KEY RESULTS

### RDMs in commercial communications:

Ebiquity identified a total of 271 individual advertising campaigns (new or re-runs) for SABMiller products between July 2011 and January 2012. The vast majority of these ads were broadcast or published for the first time before the entry into force of the commitment, but were nonetheless checked for compliance with SABMiller’s commitment to place RDMs.

**Quantitatively, the overall compliance rate is 98% - only 2% of ads monitored did not contain RDMs.**

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1. Ebiquity is a global media and marketing insight company. They help clients improve their media and marketing performance by providing them with independent data-driven insights around advertising intelligence, media, effectiveness, digital, sponsorship, reputation/PR.

2. KPMG Sustainability is part of KPMG, a global network of professional services firms providing Audit, Tax and Advisory services. KPMG has 145,000 professionals working together to deliver value in 152 countries worldwide.

**Qualitatively, the RDMs are “accurate, balanced and meaningful” in the vast majority of cases (94%) – and in all cases since August 2011. In 82% of the ads monitored, the message was considered “clear and visible”, highlighting a few (36) instances where the RDM was too small or not contrasted enough.**

These findings – relying on a sample of ads broadcast and published before the entry into force of the commitment – were taken into account immediately by SABMiller and its partners for future copies.

#### **RDMs in labelling:**

Based on the evidence provided by the local Sales and Marketing Compliance Committee (SMCC) of SABMiller, KPMG reviewed the compliance process and output data of SABMiller.

**The overall compliance rate of the total product portfolio is 97.47%.**

Out of 830 products within the scope of SABMiller’s commitment, 610 products carried the SABMiller RDM, and 199 products carried the industry-designed RDM.<sup>3</sup> 21 products failed to display an RDM.<sup>4</sup> All necessary actions have been taken by local SABMiller teams to ensure compliance of remaining products. The last product is estimated to be compliant by December 2012.

#### **Measuring outcome: preliminary results**

SABMiller carried out a poll to assess consumers’ level of awareness of RDMs. 4471 beer consumers across 8 EU markets were surveyed between November 2011 and January 2012.

**Overall, 41% of respondents claimed they noticed the presence of RDMs and could spontaneously recall at least one of the messages displayed.**

#### **Conclusions and next steps**

The positive results and the good recall by consumers revealed by the survey are very encouraging. Based on a sample of ads and labels produced before the entry into force of the commitment, this monitoring exercise has enabled SABMiller to further clarify its commitment and its guidelines to ensure that in the future, following the formal entry into force of the commitment, all ads and all labels carry an accurate, meaningful, balanced and visible RDM.

This monitoring exercise will be repeated to assess levels of compliance from the date of entry into force of the commitment (1 January 2012). Similarly, the tracking of consumer recall and recognition will be repeated twice a year to monitor the evolution of consumer’s awareness of the messages.

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3. In Poland and the United Kingdom, an industry commitment to place RDMs supersedes SABMiller’s commitment.

4. The delay in complying with the commitment may have been caused by slow sales of products carrying old RDMs, delay of artwork and longer-than-expected negotiations with brand owners (third-party owners of licensed products).

# 1. Background

## October 2006

Adoption of the EU Alcohol Strategy

## June 2007

Creation of the Alcohol and Health Forum

## 2008

Revision of the policy on Commercial Communication

## June 2010

Implementation guidelines finalized, approved, rolled out and shared with Forum members

## September 2011

Pilot review of RDMs on packaging in the Netherlands by KPMG Sustainability

## November 2011

Beginning of the packaging compliance review by KPMG Sustainability

## 31 December 2011

All RDMs expected to be compliant

## February 2012

Conclusions from the packaging compliance review by KPMG Sustainability

## March 2012

Advertising compliance review by Ebiquity

## April 2012

Publication of compliance monitoring report

## 1.1 THE ALCOHOL AND HEALTH FORUM AND THE EU ALCOHOL STRATEGY

In October 2006, the European Commission adopted its first “Strategy to support Member States in reducing alcohol-related harm”<sup>5</sup>. Endorsed soon after by the European Parliament<sup>6</sup> and the Council of the European Union<sup>7</sup>, this document lays down the priorities of the European Union to tackle alcohol-related harm for the period 2006-2012.

The Strategy was built on several key operational objective, namely to support Member States, to be action-oriented, to foster a participative multi-stakeholder approach and to encourage effective self-regulation. The Strategy recognised the fundamental importance of involving all stakeholders if widespread public health benefits were to be achieved.

The Commission therefore created several structures to implement its Strategy, including **the European Alcohol and Health Forum**, a platform to stimulate concrete stakeholder-driven action on the ground.

The EU Alcohol and Health Forum ([http://ec.europa.eu/health/alcohol/forum/index\\_en.htm](http://ec.europa.eu/health/alcohol/forum/index_en.htm)) was established with a Charter signed in June 2007 by 50 founding members, including SABMiller, as a key plank of the strategy to stimulate concrete stakeholder-driven voluntary action in the areas identified by the Strategy<sup>8</sup>. In joining the Forum, members agree to support the aims of the EU Alcohol Strategy and to develop actions to reduce the harmful consumption of alcohol across the EU. Members must make commitments to this process, and agree to monitor their commitments in a robust and transparent way. Members commit to develop concrete actions at all levels, from the European to the local level, and these should all aim to protect European citizens from the harmful use of alcohol. Members of the Forum include:

- Alcohol producers, wholesalers, retailers, caterers, insurers
- Consumer associations, health professionals, youth organisations
- Advertisers, broadcasters, publishers, other media
- Some observers, including WHO, EU institutions, Members States

5. Communication from the Commission of 24 October 2006, “An EU strategy to support Member States in reducing alcohol-related harm”, COM(2006) 625 final. Available on: [http://ec.europa.eu/health/ph\\_determinants/life\\_style/alcohol/alcohol\\_com\\_en.htm](http://ec.europa.eu/health/ph_determinants/life_style/alcohol/alcohol_com_en.htm)

6. European Parliament resolution of 5 September 2007 on an European Union strategy to support Member States in reducing alcohol-related harm (2007/2005(INI)).

7. Council Conclusions on EU strategy to reduce alcohol-related harm, 30 November and 1 December 2006 (Council document register 16165/06).

8. Charter establishing the European Alcohol and Health Forum (June 2007). Available on: [http://ec.europa.eu/health/ph\\_determinants/life\\_style/alcohol/documents/Alcohol\\_charter2007.pdf](http://ec.europa.eu/health/ph_determinants/life_style/alcohol/documents/Alcohol_charter2007.pdf)



## 1.2 SABMILLER'S COMMITMENT TO THE FORUM

SABMiller – a founding member of the Forum – has tabled a total of 20 commitments since the creation of the Forum, in various areas of action including consumer engagement programs on responsible patterns of consumption, staff training on responsible marketing, enforcement of age limits for serving/selling, and providing tools to consumers to avoid drinking and driving. All these commitments and their reports are available on <http://ec.europa.eu/eahf/searchForm.html>.

### Terms of the commitment

In 2010, SABMiller tabled a new commitment entitled “Responsible message on consumer communication materials in SABMiller’s European operations”. The commitment consisted of the following:

*“By 31 December 2011, Responsible Drinking Messages (RDMs) will be placed on primary packaging labels and on marketing communication materials in countries where it is not mandated by law or by industry – government agreements. This includes TV, radio, online advertisements, billboards and print advertisements, primary packaging labels, and printed POS materials over the size of A4.”*

### Scope of application

This commitment aimed to apply to all commercial communications on TV, radio, online advertisements, billboards and print ads, on the one hand, and on all primary packaging labels and printed POS (point of sale) materials over the size of A4 (21\*29.7 cm).

### Entry into force

On 1 January 2012.

### Accountability and compliance monitoring

In every market, the local Sales and Marketing Responsibility Committee – delegated members from various functional areas of local SABMiller affiliate company – approve all labels and related marketing communication materials in order to develop and implement precise, meaningful and readable responsible message for consumers in local context.

Furthermore, in line with the membership conditions of the Forum, this commitment was assessed in the context of a robust and transparent monitoring exercise. This report is the result of this exercise.

### 1.3 SABMILLER POLICY ON COMMERCIAL COMMUNICATION

SABMiller has integrated responsible commercial communication into its sustainable development strategy, by identifying it as its first of 10 Sustainable Development Priorities.

#### 'Ten Priorities. One Future.'

1. **Discouraging irresponsible drinking**
2. Making more beer using less water
3. Reducing our energy and carbon footprint
4. Packaging, reuse and recycling
5. Working towards zero waste operations
6. Encouraging enterprise development in our value chains
7. Benefiting communities
8. Contributing to the reduction of HIV/Aids
9. Respecting human rights
10. Transparency and ethics

To this effect, SABMiller has revised its Policy on Commercial Communication in 2008 (revised last in 2011) and has adopted Alcohol Responsibility Guidelines to provide a general framework for the SABMiller's operations to fulfil their obligation to include RDMs in all commercial communication and in labelling.

The Guidelines give out detailed explanations to implement SABMiller's commitment on RDMs. One of the key principles is relevance: SABMiller companies are encouraged to develop the RDMs based on their local market circumstances. Furthermore, RDMs should comply with the following basic principles:

- Responsibility messages should be accurate, balanced, and meaningful with regard to discouraging irresponsible drinking in the local context.
- Responsibility messages should be clearly visible or audible in the particular medium in which they are used.
- Local markets should strive for a consistent responsibility message across all brands, whenever possible.

For the benefit of its companies, SABMiller has defined three priority messages on **pregnancy, drink driving, and consumption by underage**.



Companies are however encouraged to avoid generic statements such as 'Drink responsibly'. The guidelines feature several examples of message formats.

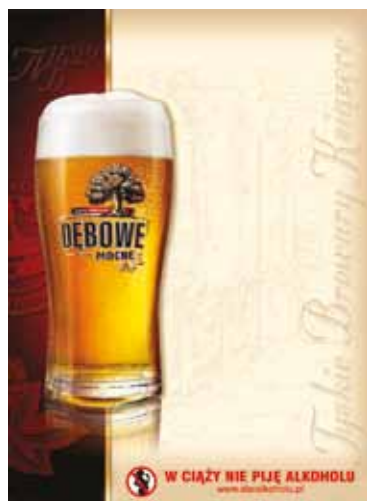
The Guidelines also set out content, placement and design standards:



- ▲ Responsibility messages should be included in all commercial communications, except permanent point-of-sale (e.g. glassware; neon signs) and consumer novelty items (eg. pens or t-shirts) where a message is optional.



- ▲ Responsibility messages should be **conspicuously placed**, meaning that it is recommended that they should occupy approximately 10% of the advertising space and time (and in no case less than 5%). In most cases this is governed by 5-10% of **surface area** (mm<sup>2</sup>) and in any case should be judged by the individual panel (see pages 12 to 28).



- ▲ All messages on packaging labels **must** appear within an area of contrasting colour. This is to ensure that the message is prominent on packaging applications and fully compliant with our Policy on Commercial Communication.



- ▲ The text should appear in capitals (except for www. talkingalcohol.com which should remain in lower-case), and in general should be centred within the background area.



- ◀ The message must be meaningful to the local market

- ▼ The messages should be used consistently across all commercial communications.



## 1.4 INPUT INDICATORS

In order to develop the guidelines, roll out their implementation and monitor compliance, SABMiller and its affiliate companies allocated significant resources and workforce to these various tasks. Since this challenge proved to be more consuming than originally anticipated, the resources were revised upwards to guarantee the most positive outcome as well as a reliable monitoring exercise.

### SABMiller Plc

Task	Input anticipated	Input effectively provided
Development of RDM guidelines	14.500 EUR	14.500 EUR
External audit	30.000 EUR	78.900 EUR
Human resources	2 staff members (internal) 5 hours/man/month	3 staff (internal) and 2 consultants (agency) 14 hrs/man/month

### SABMiller affiliate country companies

Task	Input anticipated	Input effectively provided
Design of artwork according to RDM guidelines	No input anticipated	152.600 EUR
Human resources	5 people/country 5 hours/man/month	An average 20 people/country involved 2 hrs/man/month

## 1.5 OUTPUT INDICATORS

Over 90 brands and brand variants were covered by the commitment on packaging and marketing communication materials. Only 60 brands were originally anticipated when SABMiller tabled its commitment.

On the basis of the overall number of brands and brand variants covered by this commitment, SABMiller estimates that circa 29 million people were reached by SABMiller's new RDM labelling.

On the basis of the reach of advertising materials SABMiller estimates that circa 50 million people were reached by SABMiller's RDMs.

## 1.6 THIRD PARTY MONITORING AND AUDITING

In line with the membership conditions of the Forum, this commitment was assessed in the context of a robust and transparent monitoring exercise. SABMiller commissioned the following organisations to carry out the monitoring exercise:

- Ebiquity, to review SABMiller's compliance with its commitment to place Responsible Drinking Messages in all marketing communications.

Ebiquity is a global media and marketing insight company. They help clients improve their media and marketing performance by providing them with independent data-driven insights around advertising intelligence, media, effectiveness, digital, sponsorship, reputation/PR.

- KPMG Sustainability (The Netherlands), to review SABMiller's assessment of compliance with its commitment to place Responsible Drinking Messages in all labelling.

KPMG Sustainability is part of KPMG, a global network of professional services firms providing Audit, Tax and Advisory services. KPMG has 145,000 professionals working together to deliver value in 152 countries worldwide.



## 2. Compliance monitoring: Marketing communication

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SABMiller has made the following commitment to the EU Alcohol and Health Forum (AHF):

*“By 31 December 2011, alcohol responsibility messages will be developed and placed on TV, online, and print (above A4 size) advertisements, in compliance with the SABMiller responsible messaging guidelines in SABMiller’s European operations.”*

The SABMiller guidelines specify that:

- Responsibility messages should be accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context
- Responsibility messages should be clearly visible or audible in the particular medium in which they are used.

Ebiquity was commissioned:

- To monitor compliance with the above commitment on behalf of SABMiller through statistically relevant tracking of marketing communication in sample European territories in TV, Print and Internet
- To provide a qualitative review of the RDMs used based on provided SABMiller guidelines to be ‘accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context’ and to be ‘clearly visible or audible’

### 2.1 METHODOLOGY

While the commitment applies to TV, radio, cinema, online, billboard and print advertising, compliance monitoring was limited to TV, Print and Internet, for two main reasons: these 3 media represent the bulk of SABMiller’s advertising; compliance monitoring of radio, cinema and billboard advertising would add significant technical complexity and increase cost substantially.

The EU markets where SABMiller is active and where this commitment therefore applies are: Czech Republic, Hungary, Italy, Netherlands, Poland, Romania, Slovakia, Spain and the UK. However, the commitment is superseded by law and an industry/government agreement in Poland (for TV spots) and the UK (for all advertising) respectively.

The monitoring period chosen runs from July 2011 to January 2012, encompassing a long period before the entry into force of the commitment, chosen in order to include the summer period and thus allowing a review of a sufficient number of beer advertising. SABMiller started the implementation well before the deadline; therefore the monitoring has still provided valuable information about potential improvement areas.

### Presence of RDM in ads

Monitoring the implementation of the commitment involved first of all verifying the presence of RDMs on SABMiller advertising copy. Ebiquity's automated 24/7 monitoring picked up every appearance of every TV spot, print advertisement and Internet display banner in monitoring channels, titles and sites in 15 Western European territories, including one of those selected by SABMiller – Italy.

All Creative copies on air, in print and online during the monitored period were categorised and databased and were then be reviewed to check inclusion of the RDMs.

In Central and Eastern Europe Ebiquity picked up the first appearance of new TV spots, print advertisements and Internet display banners in the other five selected territories - Czech Republic, Hungary, Poland, Romania (NB – no Internet coverage) and Slovakia.



In addition, local market monitoring resources were used in the Czech Republic, Hungary, Poland and Slovakia to identify and source any other Creative copies on air, in print or online during the monitored period.

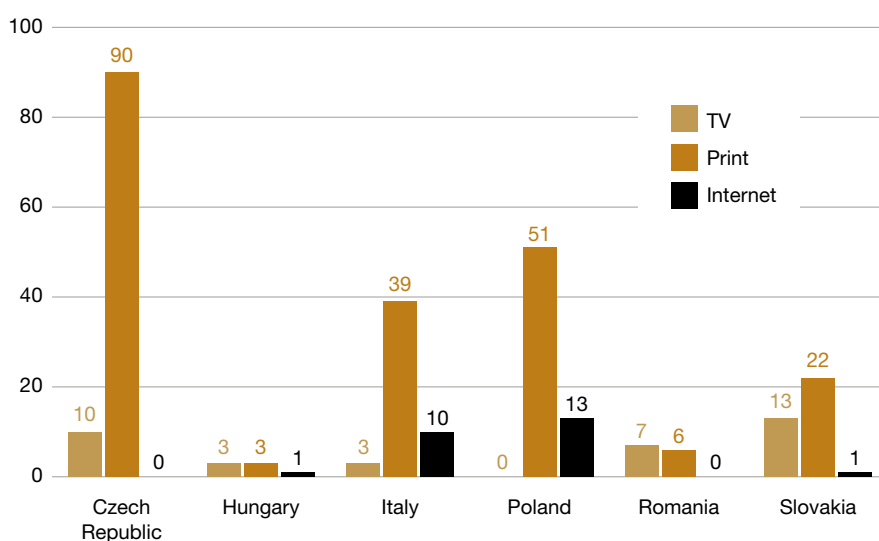
Creative copies were categorised and databased and then reviewed to check inclusion of the RDMs.

Each ad not featuring an RDM in line with SABMiller's commitment was deemed an instance of non-compliance.

### Qualitative compliance

As well as a quantitative analysis, the monitoring reviewed whether the RDMs found were “accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context”, as well as “clearly visible or audible”.

For the qualitative analysis, Ebiquity was supplied with the specific SABMiller guidelines, and reviewed areas of concern jointly with SABMiller.



## 2.2 DETAILED RESULTS

### Presence of RDMs in ads

In total – 271 monitored pieces of advertising communication creative

TV – 36

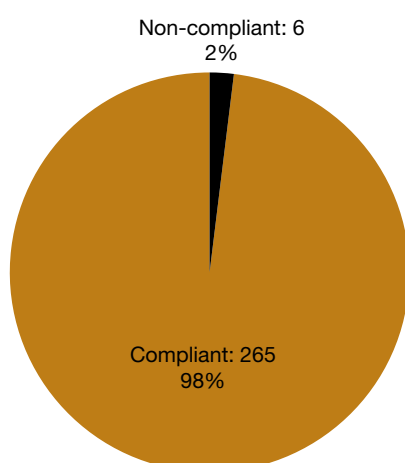
Print – 211

Internet – 25

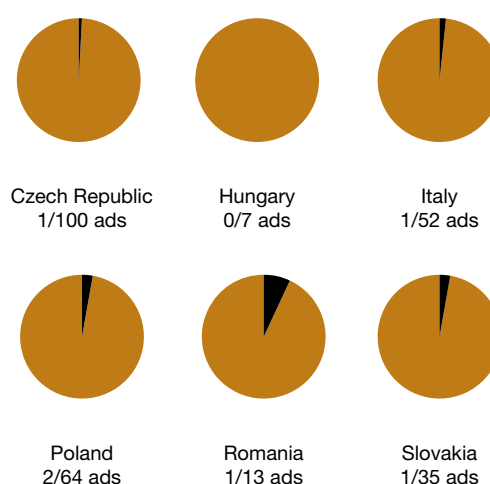
*Creatives found in the monitored period - per country per medium*



Out of the 271 ads monitored, 6 were found non-compliant:



**Overall final compliance ratio**



**Breakdown per country**

### Qualitative review results

All monitored ads were reviewed visually against the two parts of the SABMiller guidelines.

- Responsibility messages should be accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context
- Responsibility messages should be clearly visible or audible in the particular medium in which they are used

For those with an RDM, the following considerations were taken

- 'Accurate, balanced and meaningful'
- Message specific, avoiding vague general statements about 'responsible drinking'
- 'Clearly visible or audible in the particular medium in which they are used'
- Size of the message – meeting the guideline of 5-10% of the ad. This was assessed in terms of space for print; in terms of time for TV; and in terms of time and space for Internet
- Placement of the message – location on the page/in the spot
- Clarity of the message – copy/logo easy to read
- Additionally, consideration was given to the consistency of RDMs used in each country.

### Global results

Qualitatively, the RDMs are accurate, balanced and meaningful in the very large majority of cases – and in all cases since August 2011

#### **Accuracy, balance and meaningfulness of RDMs**

#### **Qualitative compliance rate in sample period – 94%**

Compliance would appear to be strongly established among Commitment signatories

However, there is still some room for improvement in the size and visibility of the messaging.

#### Size and visibility of RDMs

##### **Qualitative compliance rate in sample period – 82%**

Clarity and visibility of messaging is well established in line with the Commitment, but more can be done to strengthen this action

**In a minority of cases (36), the RDMs in advertising copies were found to be lacking in visibility for various reasons:**

- Faint and small
- Undersized
- Hardly visibly particularly for the colour blind
- Not sharp enough
- Bad quality
- Less than 5% of page
- Little contrast against copy

#### Comments

Based on the sampling in this project, only a very small proportion (2%) of creatives have been aired or published without an RDM. Considering that this monitoring was carried out during a period before the entry into force of the new commitment, these results are very encouraging.

RDMs are in the vast majority accurate, balanced and meaningful. The small number of RDMs with mentions of 'responsible' drinking are for the most part found in executions first aired/published in 2010, and in all cases no later than July 2011.

Performance on the 'visible/audible' measure is more mixed. In several countries, notably Poland and Italy, a minority of RDMs are too small in Print and TV creatives. There are some questions about the placement of RDMs in TV creatives – those which appear in the last 3-4 seconds of the ad are the clearest, while those which appear for 3-4 seconds at other points in the spot, for example right at the beginning or more notably at some point during the spot, were very difficult to pick up and were in some cases missed on the first or even second viewing when monitored. In two instances of non-compliance, the RDM was perfectly readable but because of the media space chosen (double page spread), it did not comply with the obligation to represent a minimum of 5% of the total media space used.

There is also further development work to be done on Internet advertising – RDMs are generally of suitable size on the frame of the Internet ad in which they appear, but where there are multiple frames, this effect is diluted.

In addition, where there are multiple frames and the ad takes time to play out, the RDM may not be seen at all by consumers, given the relatively short dwell time to be expected when Internet users interact with online creative. The commitment guidelines should clarify better whether it is time or space which should be measured in this medium – further thought on this topic is recommended.

These findings – relying on a sample of ads broadcast and published before the entry into force of the commitment – were taken into account immediately by SABMiller and its partners for future copies.

Three further points are noteworthy in this qualitative analysis:

**1. Choice of RDM**

In Poland, the significant majority of creatives (44 of 52) with an RDM used a message based on 'I don't drink alcohol when pregnant'.

**2. Application of exceptions**

There are a handful of examples of inconsistency between countries where an RDM appears in an advertorial/editorial in one market but not in another (eg appears in Poland; does not appear in Slovakia). This inconsistency can be addressed as the commitment evolves.

**3. Size of ads covered by the Commitment**

A large majority of the queries raised by this monitoring project where a creative lacked an RDM are answered by the size of the creative being smaller than A4 and therefore not part of the commitment.

However, promotional items such as beer mats, usually much smaller than A4, are covered by the terms of the commitment. Again, this may be reviewed as the commitment terms develop.

### 3. Compliance monitoring: Labelling and packaging

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KPMG was commissioned to review SABMiller's compliance with its commitment to display Responsible Drinking Messages in all packaging and labelling of their beverages, in line with SABMiller's voluntary guidelines.

#### 3.1 METHODOLOGY

To carry out this monitoring exercise, the focus was on the packaging and labelling on primary packaging materials, i.e. glass/PET bottles and cans. Each variation of a beverage from the SABMiller product portfolio was identified by a unique Stock Keeping Unit (SKU). SKUs are a number or string of alpha and numeric characters that uniquely identify a product. SKUs are hereafter referred to as "product".

Every SABMiller Europe AG company has an internal Sales and Marketing Compliance Committee (SMCC) responsible for ensuring that all labelling complies with the guidelines. The various SMCC reported to SABMiller on compliance with the commitment in the following markets: **Spain (Canary Islands), Czech Republic, Hungary, Italy, the Netherlands, Romania, and Slovakia**

Following this internal review, KPMG performed a review to verify SABMiller's findings. This review was carried out from November 2011 to February 2012, following a pilot review in September 2011 in the Netherlands. Visits to review labels were also held in the following countries: Czech Republic, the Netherlands and Italy.

In each market, KPMG identified the relevant product part of the SABMiller portfolio, whether domestic, international or imported, and submitted it for internal and external review.



The following describes the process that forms the basis for the compliance monitoring:

1. All SABMiller Europe AG companies have an internal Sales and Marketing Compliance Committee (SMCC) responsible for ensuring that all labelling complies with the guidelines. Every SKU has a label, which needs to be compliant with the guidelines. As a result, every label for each SKU needs a final approval by the SMCC per country. The approvals are expectedly documented and available at country level.

2. For domestic brands there is one SKU identification number available. In cases of promotional repackaging the financial SKU and the manufacturing SKU may not be identical.  
For international brands the financial SKU identification number in the country of sale may not be identical to manufacturing SKU identification in the country of production.  
Imported brands are produced outside of the European countries and have only a financial SKU at the country of sale.
3. The departure point for the analysis was the most complete sales list for each country monitored, containing financial SKUs for domestic, international and imported brands. This list was then matched with the manufacturing list for domestic brands. Finally international and promotional financial SKU from the sales list were identified with a manual check.
4. After approval by the SMCC, materials in the new design are ordered. All existing old materials are used to minimise existing materials write-off. As a result a mix of old and new materials can be used in the conversion period. By 31 December 2011, all labels approved by the SMCC must be compliant with the guidelines and in use.

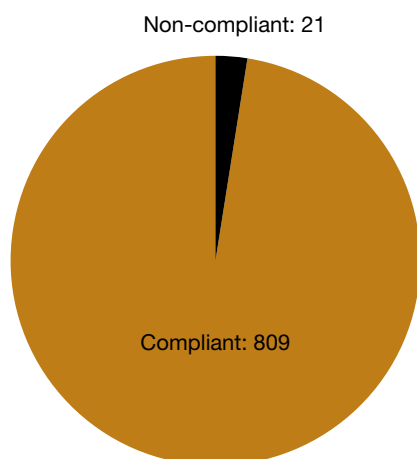


### 3.2 DETAILED RESULTS

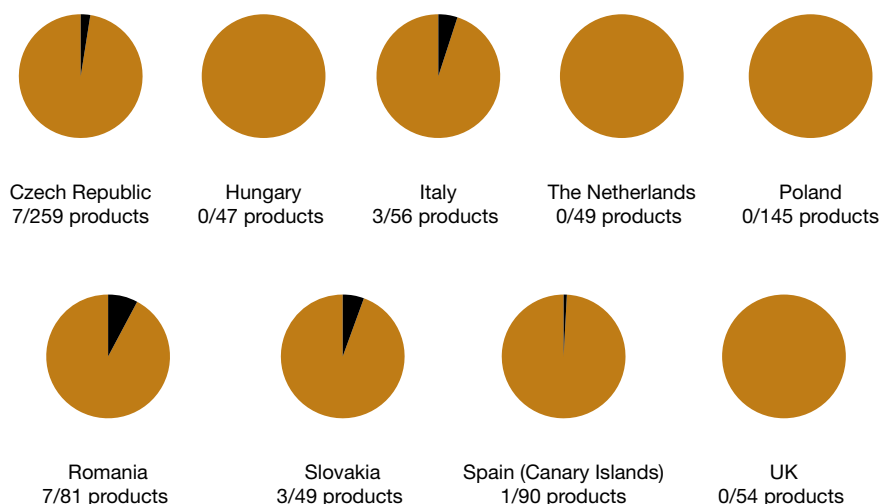
Following the compliance monitoring exercise on the labels of 830 products, SABMiller reached the following compliance rate:

**97.47% of SABMiller's SKUs were in compliance with its commitment to the EU Alcohol and Health Forum.**

Out of the 830 products reviewed, 21 were non-compliant by 31 December 2011.



**Overall final compliance ratio**



**Breakdown per country**

## Comments

The compliance level was assessed for 830 products. In most markets – totaling 631 products – the compliance was measured against the SABMiller commitment and its personal RDMs. In two markets (Poland and the United Kingdom), however, an industry agreement/industry-government agreement superseded SABMiller's commitment. Compliance was therefore measured in light of the local applicable agreement. These results were nevertheless included in this compliance report since they form part of the same overall voluntary initiative with a similar objective.

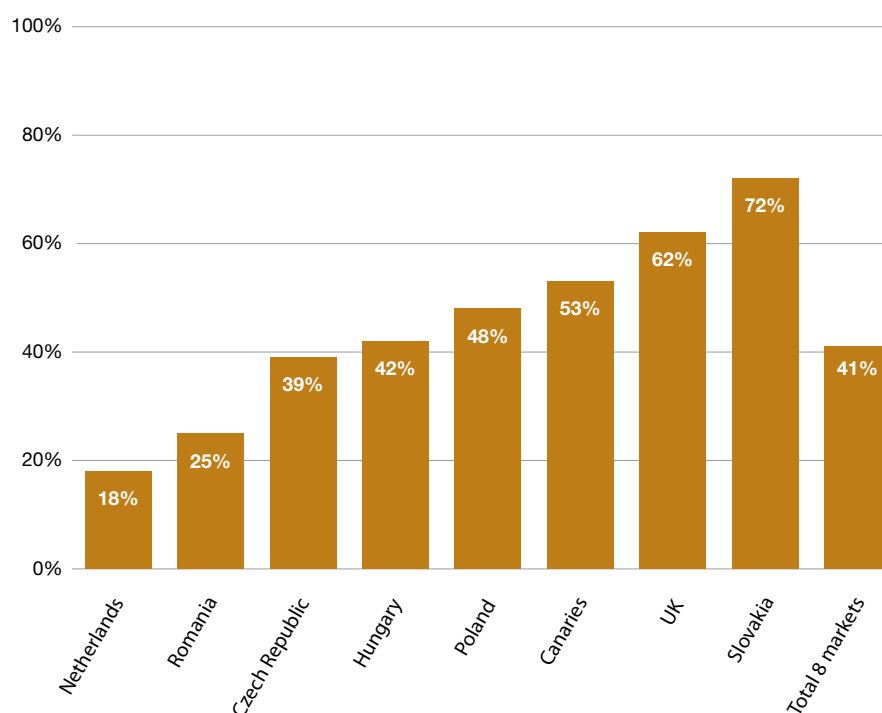
Although the compliance level is high, there are a few instances of non-compliance. By mid-2011, most operations of SABMiller already complied with the commitment, however, in some markets, the rolling-out of the instructions may have been delayed which can explain cases of non-compliance. In some markets, slower-than-expected sales of particular products may have delayed the entry in off-trade of the correctly-labelled products. In other markets, third-party owners of licensed products responsible for approving the new packaging faced scheduling challenges which delayed the production and dissemination of the new labels. Furthermore, non-compliance may have been caused by grey import out of SABMiller's control and old labels on products still in the retailing supply chain, marketed after 31-12-2011. Finally, some internal scheduling delays may have been at the origin of some instances of non-compliance.

In all markets where the monitoring exercise revealed instances of non-compliance, necessary actions were taken – where appropriate – to make sure future labels were in compliance with the commitment in the course of 2012.



## 4. Measuring outcome – Consumer recall and recognition

SABMiller carried out a survey to assess consumers' level of awareness of RDMs. 4471 beer drinkers across the 8 EU markets were interviewed between November 2011 and January 2012.



When asked to answer spontaneously what messages they had heard or seen in marketing communications or on beer packaging, an average 41% of respondents spontaneously cited at least one RDM.

*Spontaneous awareness of RDMs in percent*

*Question 1: On their packaging or in their communication, beer companies place messages to encourage people to adopt responsible behaviours, what messages of this kind have you ever heard or seen of?*



The results of the survey highlight great differences across the markets, which may reflect the greater emphasis given, in some markets, to particular messages (e.g. “don’t drink and drive”), and whether the RDM was coupled with targeted campaigns on other media, including online.

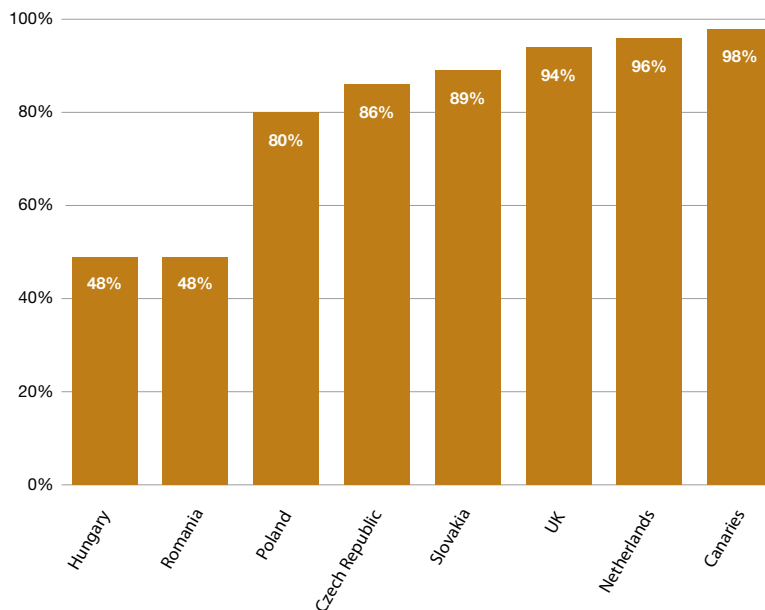
Slovakians had the strongest spontaneous recall of RDMs among all markets with 72% of respondents being able to list one or more RDMs. Messages warning against “underage drinking” were the most often cited messages with 58% of Slovaks spontaneously listing it.





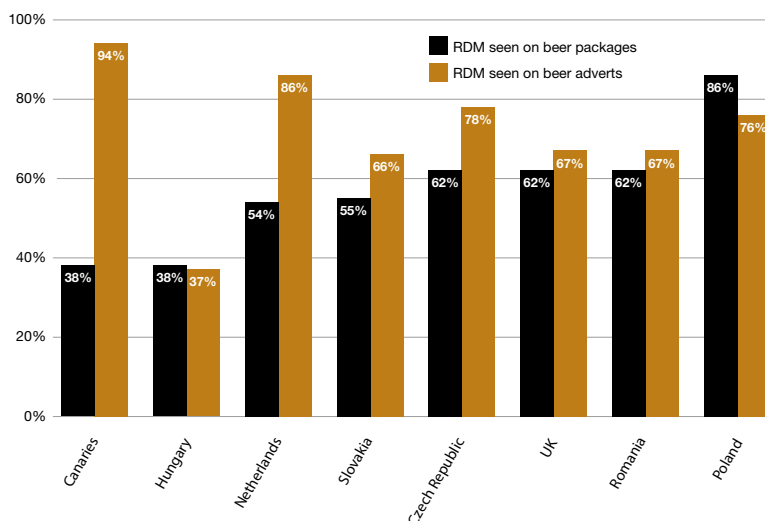
“Do not drink and drive” was the most popular message among Polish (38%), Slovakian (23%), Canarian (18%), Romanian (11%) and Czech (15%) beer drinkers.

“Enjoy & drink responsibly” was the most spontaneously recalled RDM in the UK (35% recalled “drinkaware.co.uk” and 15% “drink responsibly”), the Netherlands and Slovakia (both 14%) and in the Canaries (32%), while it was not listed by a single Polish respondent. This message is not an SABMiller message, but was nonetheless recalled spontaneously by respondents.



The percentage of prompted awareness of RDM messages was much higher in most markets. Apart from Hungary and Romania, above 73% of respondents in the other markets responded affirmatively when asked if they had already heard or seen RDM messages.

*Prompted awareness of RDMs in percent*  
*Question 2: ...and which of these messages have you ever seen or heard of? PROMPTED*



When prompted, respondents claim to have seen/heard of RDMs on both beer packaging and in advertising (on TV, print, cinema, billboards and internet). With the exception of Poland and Hungary, beer adverts seem to greatly generate consumers' RDMs awareness. The lowest awareness from both beer packaging and adverts can be found in Hungary due to the general low awareness of RDMs.

*Question 3: Which did you notice on beer packaging? PROMPTED*

*Question 4: Which did you notice on beer adverts - TV, cinema, billboards, internet and print? PROMPTED*



## 5. Next steps

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SABMiller is committed to delivering meaningful consumer information, and is regularly taking the pulse of consumers' expectations and policy makers' priorities to participate in finding new means to curb alcohol abuse. Regarding responsible drinking messages, these are a few of the future local initiatives related to RDMs led by SABMiller:

### The Netherlands

In the Netherlands, one of the government's priorities is to reduce youth/binge drinking. A logo was developed ( 'geen 16, geen druppel') and implemented by all stakeholders including the alcohol industry by embedding it in our self-regulation code since 2010. The next step for 2012 will be to develop a campaign for 'geen 16, geen druppel'. The multi-stakeholder process has already started.. The logo is present in all SABMiller commercial communication, in addition to the SABMiller RDM on labels and packaging since April 2010.

In the future, SABMiller teams in the NL will focus on the legal drinking age and pregnancy. 'Drink-driving' is being considered since this is already well covered by the very successful BOB campaign. Tailored RDMs on under-age people and pregnant women (including new designs and pictograms) will be primarily placed on packaging and labelling, since the industry message 'geen 16, geen druppel' and the logo is already present on commercials communications.

### Hungary

In Hungary, where the priority is set on reminding people under the legal drinking age that they should not drink, local SABMiller teams are developing labels to also warn pregnant women against alcohol consumption. As a starting point relevant RDMs could be placed on two local brands (Ászok semi-dark bottle+can and Dreher Bak bottle), elected for their popularity with female consumers.

### Czech Republic

In Czech Republic, Plzensky Prazdroj started to implement an RDM focusing on pregnant women. The message "PREGNANT WOMEN SHOULD NOT DRINK ALCOHOL" has begun appearing since March 2012 on all new cans for the entire brand portfolio, for both primary and secondary packaging.

On the corporate and brand websites the responsible message "PREGNANT WOMEN SHOULD NOT DRINK ALCOHOL" will be placed and alternate with the other two messages "DON'T DRINK AND DRIVE" and "FOR PEOPLE OVER THE AGE OF 18 ONLY" from the second quarter of 2012.

As part of long-term plan, Plzensky Prazdroj will use responsible message "PREGNANT WOMEN SHOULD NOT DRINK ALCOHOL" also on all commercial communication.





## Poland

In Poland, Kompania Piwowarska introduced the RDM focusing on pregnant women on promotion materials and in the Internet communication in May 2011. This was undertaken with the cooperation of Fastryga – a Polish NGO helping children with Foetal Alcohol Syndrome, FAS - consisting of printing educational materials for pregnant women, creating a Facebook application (used so far by over 16.000 people) and producing an educational film on YouTube informing women about the risks linked to alcohol consumption during pregnancy.

In the future, the cooperation with Fastryga will be continued to produce educational leaflets and posters to be distributed in the childbirth education classes and gynaecological examination rooms. Thanks to fundraising via the Facebook application, Kompania Piwowarska will help renovating Fastryga's venues.



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## Slovakia

Pivovary Topvar introduced RDM warning that pregnant women should not drink on Gambrinus brand as of April 1, 2012. On the long term in 2013 and onwards Pivovary Topvar plans to involve all 3 RDMs on packaging.

## Italy

In Italy, in order to warn pregnant women against alcohol consumption, and to remind people that they should not drink and drive, the local team have developed labels with both RDMs on all primary packaging of their local brands (Peroni, Peroni Gran Riserva, Peroni Gran Riserva Rossa, Peroncino, Nastro Azzurro, Whurer, Raffo). The new labels will be available in the market starting in June 2012. Secondary packaging and cartons still carrying the Drink and Drive RDM's.



## 6. Conclusions & Recommendations

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This is the first time an independent and transparent monitoring exercise was undertaken to assess the compliance of SABMiller with its commitment to place RDMs on packaging and in commercial communication. The high levels of compliance for both strands of the commitment (advertising and packaging) demonstrate the company's strong involvement in providing consumers with information on alcohol consumption. Placement of RDMs has now been fully integrated into the routine business practices of SABMiller.

The results of the awareness tracking in key markets are also very encouraging – consumers notice, read, and remember the key messages as identified by SABMiller – that underage people, pregnant women and drivers should not be drinking alcohol.

These messages, along with web-based campaigns and many other initiatives, are SABMiller's contribution to remind consumers about the various aspects of responsible drinking and to curb alcohol abuse.

However, this monitoring exercise revealed some delays in rolling out the RDMs in certain cases. It is the case notably regarding RDMs in print advertising. There was some level of uncertainty whether the commitment applied to print marketing material which was – occasionally – too small to accommodate SABMiller's RDMs in a legible manner. The instructions on how to apply the SABMiller commitment in print media will therefore be further clarified with reference to sizes allowing easy legibility based on the findings of this monitoring exercise in the upcoming financial year, to ensure consistency and high level of compliance. Furthermore, in a few instances, the RDM – although present – was not appropriately sized or did not contrast well enough with the advertising copy to be fully visible. These findings – relying on a sample of ads broadcast and published before the entry into force of the commitment – were taken into account immediately by SABMiller and its partners for future copies.

While every effort was made to ensure that all products entering the market on 1 January 2012 displayed the RDM, in some cases, a few products were found non-compliant. In some markets, sales of certain products were slower than expected and have delayed the entry on the market of the correctly-labelled products. In others, third-party owners of licensed products responsible for approving the new packaging faced scheduling challenges which delayed the production and dissemination of the new labels. Finally, some internal scheduling delays may have been at the origin of some instances of non-compliance. At any rate, all necessary actions have been taken by local SABMiller teams to ensure compliance of remaining products as soon as possible, the last product entering the market by end of December 2012.

Implementing messages on labels and in marketing materials can be helpful but should not be seen as resolving alcohol abuse problems. To this end the messages as applied by SABMiller also serve as directing consumers to websites with comprehensive information on alcohol and health and responsible drinking. These websites have been visited by approximately 20 000 visitors per month. To achieve behavioural changes actions have to go beyond providing information. To this end SABMiller has collaborated with several NGOs, experts, trade associations, government institutions and is willing to engage with every partner who wants to reduce alcohol abuse and related harm.

This exercise will be repeated in the future to measure the evolution of SABMiller's compliance with its commitment. It will be interesting, in particular, to monitor compliance on the basis of a sample of labels and ads produced after the entry into force of the commitment (1 January 2012). Similarly, the tracking of consumer recall and recognition will be repeated twice a year to monitor the evolution of consumer's awareness of the messages.

# Annex I – Ebiquity Compliance Monitoring Report

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## 1 **Ebiquity**

Ebiquity is a global media and marketing insight company. We help our clients to improve their media and marketing performance by providing them with independent data-driven insights around:

- Advertising intelligence
- Media
- Effectiveness
- Digital
- Sponsorship
- Reputation/PR

We work with over 1,000 clients in 60 countries, from start-up agencies to multi-national corporations, including over 85 of the Top 100 International advertisers and every agency network. Formed by joining together a number of businesses including Xtreme Information and Billetts, we employ over 600 people across 21 offices in 14 countries.

We are experts in capturing national and international advertising activity in over 70 countries; aggregating and analysing breaking copy; tracking and calculating advertising placement and linked media expenditure. Our services deliver actionable insights and develop informed strategies to capitalise on opportunities, respond effectively to competitive threats and gain market share. We provide evidence-based insights via our suite of proprietary tools and techniques, helping our clients gain greater value and better ROI, because we monitor, measure and analyse more media and marketing data than anyone else.

Clients of Ebiquity benefit from our unrivalled global reach, specialist services tailored to fulfil their specific needs, and personal attention from a dedicated team.

**Ebiquity** – Data driven insights.

## **2 Project details and KPIs**

### **a. The aim**

SABMiller has made the following commitment to the EU Alcohol and Health Forum (AHF):

*“By 31 December 2011, alcohol responsibility messages will be developed and placed on TV, radio, cinema, online, billboard and print (above A4 size) advertisements, beer mats and labels, in compliance with the SABMiller responsible messaging guidelines in SABMiller’s European operations.”*

SABMiller companies develop responsibility messages based on their local market circumstances – where RDMs are not mandated by law or sectoral agreements. The SABMiller guidelines specify that:

- Responsibility messages should be accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context
- Responsibility messages should be clearly visible or audible in the particular medium in which they are used

The EU markets where SABMiller is active and where this commitment therefore applies are: Czech Republic, Hungary, Italy, Netherlands, Poland, Romania, Slovakia, Spain and the UK. However, the commitment is superseded by law and an industry/government agreement in Poland (for TV spots) and the UK (for all advertising) respectively.

Ebiquity carried out monitoring of SABMiller compliance with their commitment to display RDMs in their TV, print and Internet marketing communications in selected EU markets.

### **OBJECTIVES:**

- To monitor compliance with the above commitment for Landmark Europe on behalf of SABMiller through statistically relevant tracking of marketing communication in sample European territories in TV, Print and Internet
- To provide a qualitative review of the RDMs used based on provided SABMiller guidelines to be ‘accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context’ and to be ‘clearly visible or audible’

### **b. The brief**

#### **i. Territories**

Six EU countries were selected as a representative sample of the EU markets:



Czech Republic	Italy	Romania**
Hungary	Poland*	Slovakia

\*No TV monitoring required in Poland due to an industry/government agreement

\*\*No Internet monitoring available in Romania

ii. Time period

July 2011 – January 2012

This time period was chosen in order to include the Summer period in which a higher than average amount of beer advertising takes place.

It is acknowledged that advertising placed before 31<sup>st</sup> December 2011 is not officially subject to the terms of the Commitment - this compliance project is run with all monitored material checked as though the Commitment were in full force throughout.

iii. Specific monitoring dates

In the Czech Republic, Hungary, Italy, Poland and Slovakia, monitoring took place of all advertising running in the time period.

In Romania, all ads which broke for the first time in the time period were monitored.

iv. Definitions

Accurate, balanced and meaningful

Clearly visible or audible

**c. The deliverables**

The Key Performance Indicator (KPI) established by Landmark Europe for SABMiller is the statistically relevant tracking of marketing communications to check the inclusion of an RDM.

This KPI covers two areas:

1) Each ad not featuring an RDM in line with SABMiller's commitment will be deemed an instance of non-compliance.

2) Each RDM will then be assessed on being 'accurate and balanced' as well as 'clearly visible or audible'.

**d. Details of non-compliant material**

i. TV, Print, Internet

Step 1 – all TVCs reviewed and tagged for inclusion/exclusion of RDM

Step 2 – where an RDM is present, the message, position and prominence of the RDM assessed against the criteria and a qualitative evaluation carried out

Details of non-compliant material in the monitored countries provided to SABMiller for review.

Responses evaluated and final compliance calculated.



### **3 Methodology**

#### Methodology

##### 1) Monitoring and core compliance

Monitoring the implementation of the commitment involved first of all verifying the presence of RDMs on SABMiller advertising copy.

##### - European tracking service

Ebiquity's automated 24/7 monitoring picks up every appearance of every TV spot, print advertisement and Internet display banner in monitoring channels, titles and sites in 15 Western European territories, including one of those selected by SABMiller – Italy.

All Creative copies on air, in print and online during the monitored period were categorised and databased and were then be reviewed to check inclusion of the RDMs.

##### - Broader European monitoring service

In Central and Eastern Europe Ebiquity picks up the first appearance of new TV spots, print advertisements and Internet display banners in the other five selected territories - Czech Republic, Hungary, Poland, Romania (NB – no Internet coverage) and Slovakia.

In addition, local market monitoring resources were used in the Czech Republic, Hungary, Poland and Slovakia to identify and source any other Creative copies on air, in print or online during the monitored period.

Creative copies were categorised and databased and then reviewed to check inclusion of the RDMs.

Each ad not featuring an RDM in line with SABMiller's commitment was deemed an instance of non-compliance.

The monitoring covered the period July 2011 to January 2012. Neither Landmark Europe nor SABMiller were informed in advance of the time period over which the monitoring took place.

##### 2) Qualitative compliance

As well as a quantitative analysis, the monitoring reviewed whether the RDMs found were 'accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context', as well as 'clearly visible or audible'.

For the qualitative analysis, Ebiquity was supplied with the specific SABMiller guidelines, and reviewed areas of concern jointly with SABMiller.

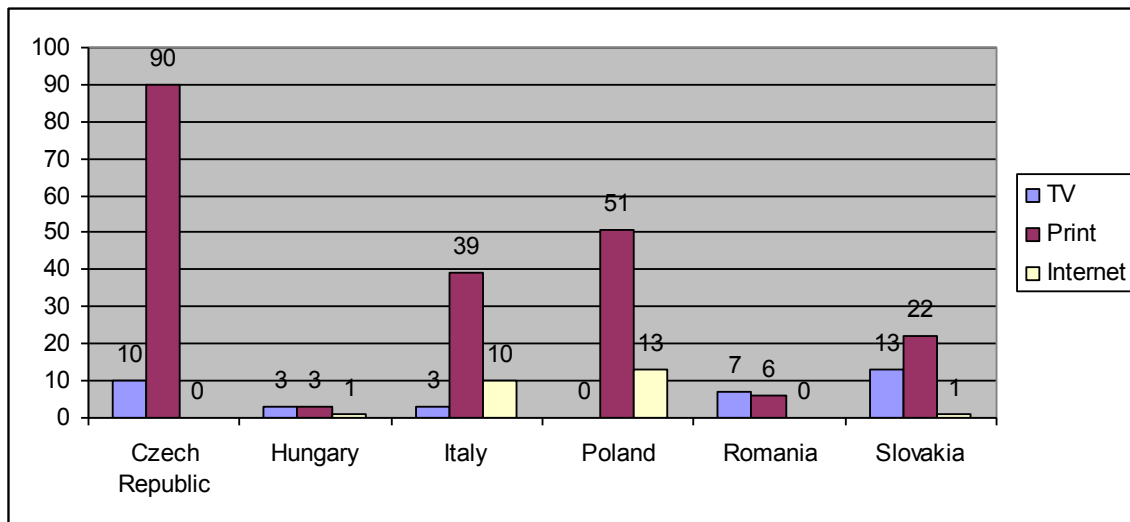
## 4 Global Results

### Data metrics

#### a. Number of individual advertisements monitored

Creative activity monitored across the six countries in the period July 2011 – January 2012.

**Graph A:**  
**Creatives found in the monitored period - per country per medium**



In total – 271 monitored pieces of advertising communication creative

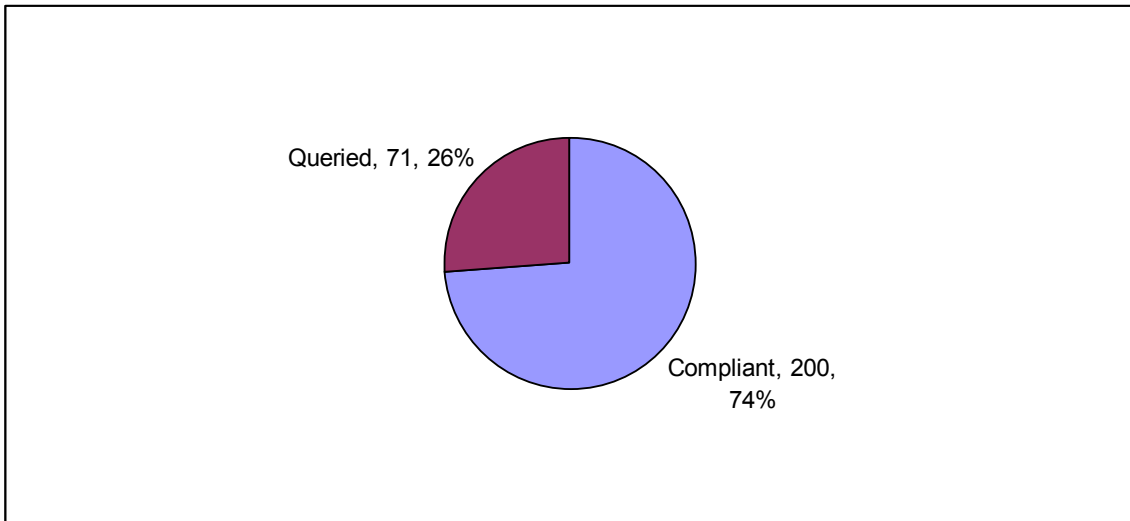
TV – 36

Print – 211

Internet - 25

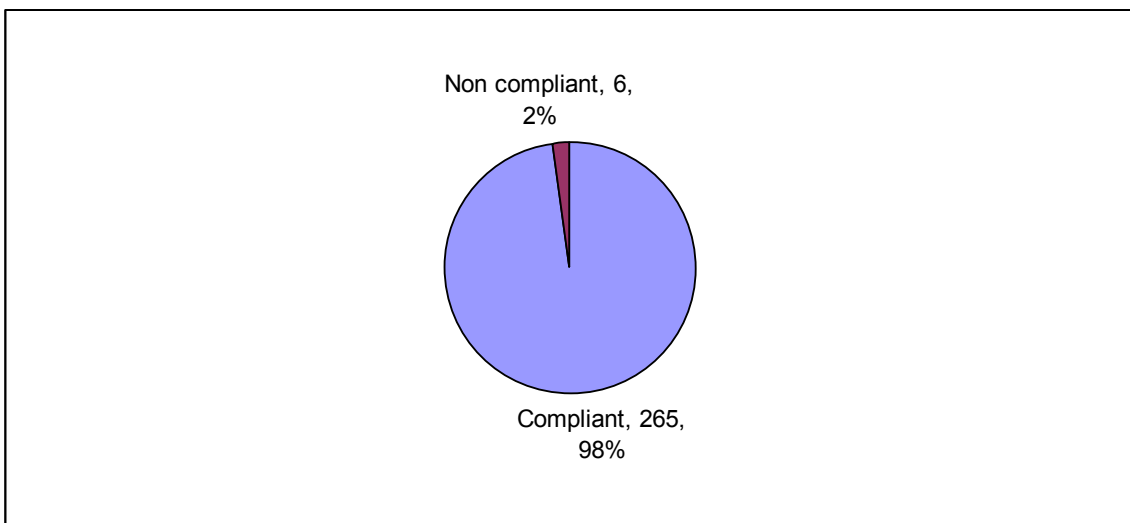
71 potential non-compliance instances – ads with no RDM

**Graph B:**  
**Overall initial compliance ratio**



Confirmed non-compliance instances – ads with no RDM which according to the terms of the Commitment should have had an RDM

**Graph C:**  
**Overall final compliance ratio**



**5 Country by country monitoring results**

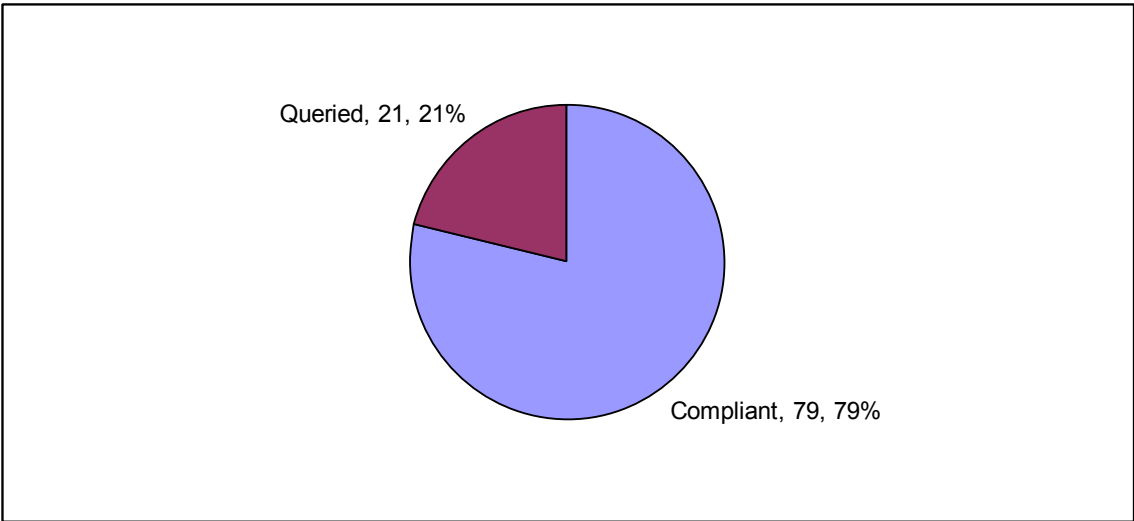
These figures cover all monitored activity in the period.

**a. Czech Republic**

100 alcoholic drink creatives in the monitored period

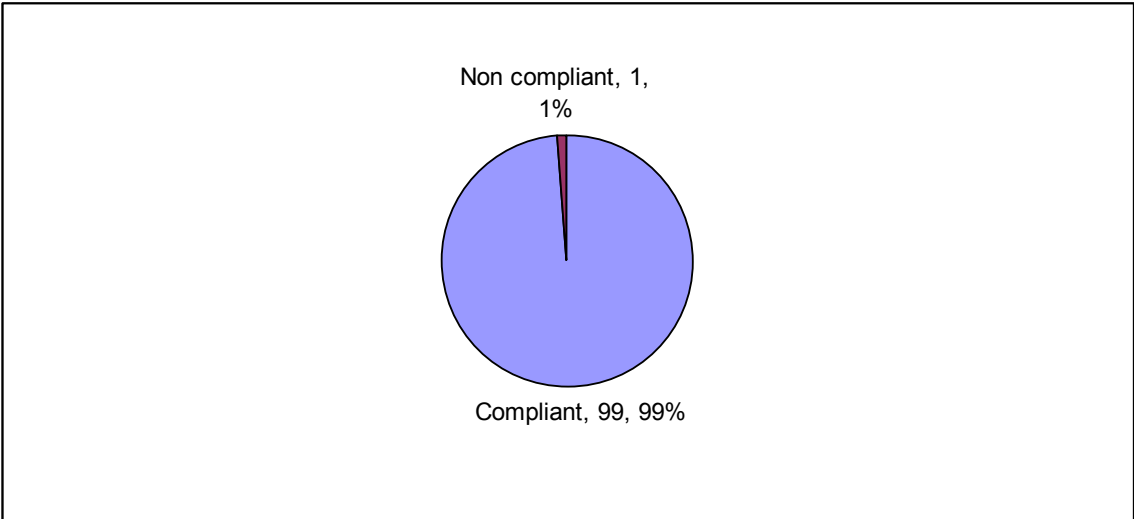
21 potential non-compliance instances – ads with no RDM

**Graph D:  
Czech Republic – Initial compliance ratio**



Confirmed non-compliance instances – ads with no RDM which according to the terms of the Commitment should have had an RDM

**Graph E:  
Czech Republic – Final compliance ratio**

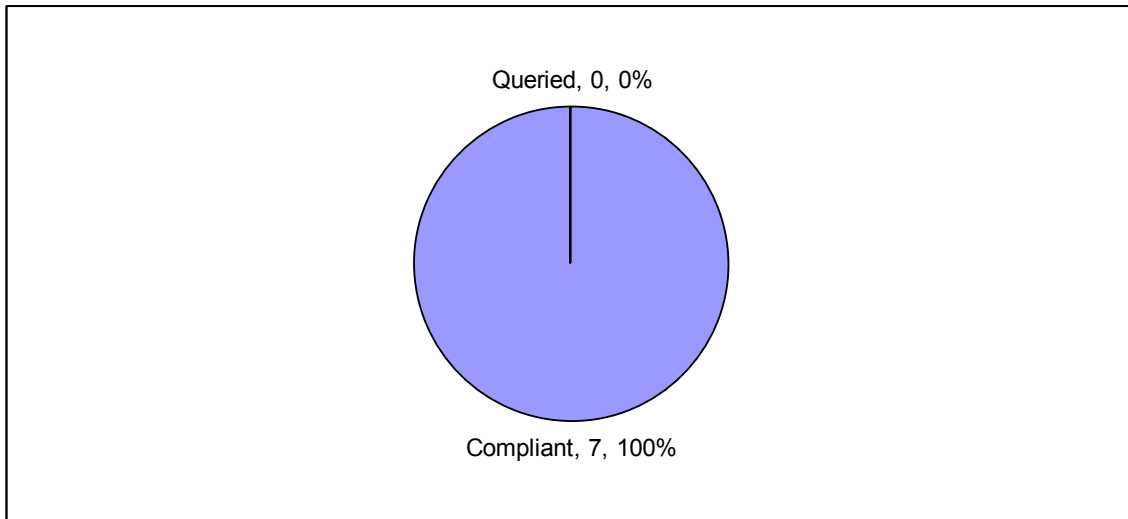


**b. Hungary**

7 alcoholic drink creatives in the monitored period

Full compliance

**Graph F:  
Hungary - Compliance ratio**

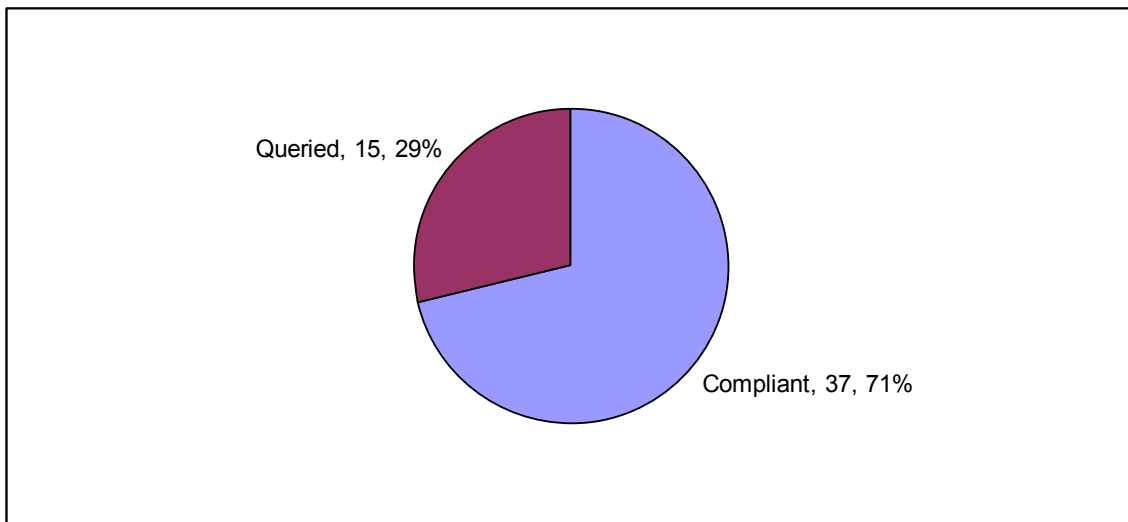


### c. Italy

52 alcoholic drink creatives in the monitored period

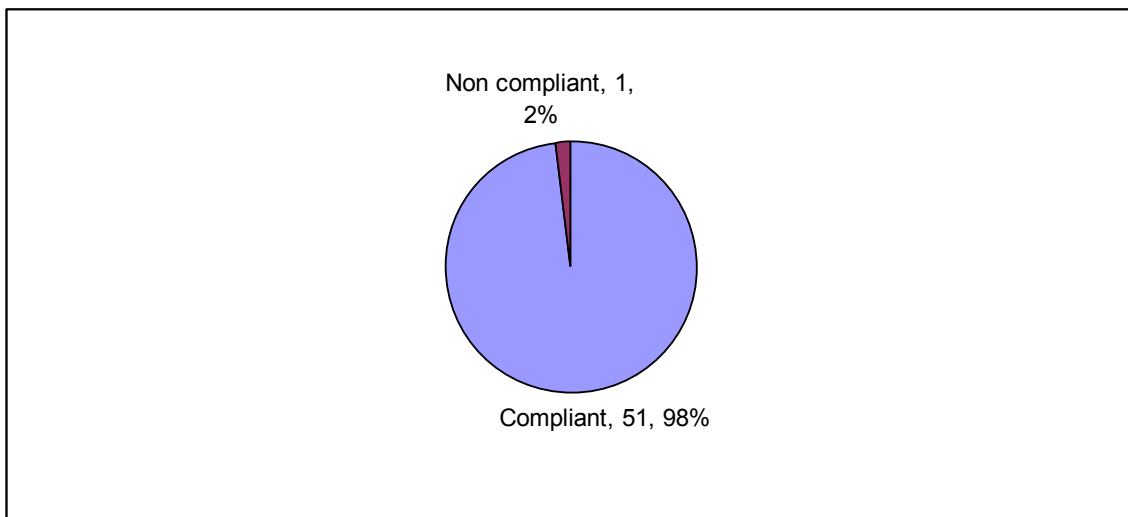
15 potential non-compliance instances – ads with no RDM

**Graph G:**  
**Italy - Compliance ratio**



Confirmed non-compliance instances – ads with no RDM which according to the terms of the Commitment should have had an RDM

**Graph H:**  
**Italy – Final compliance ratio**

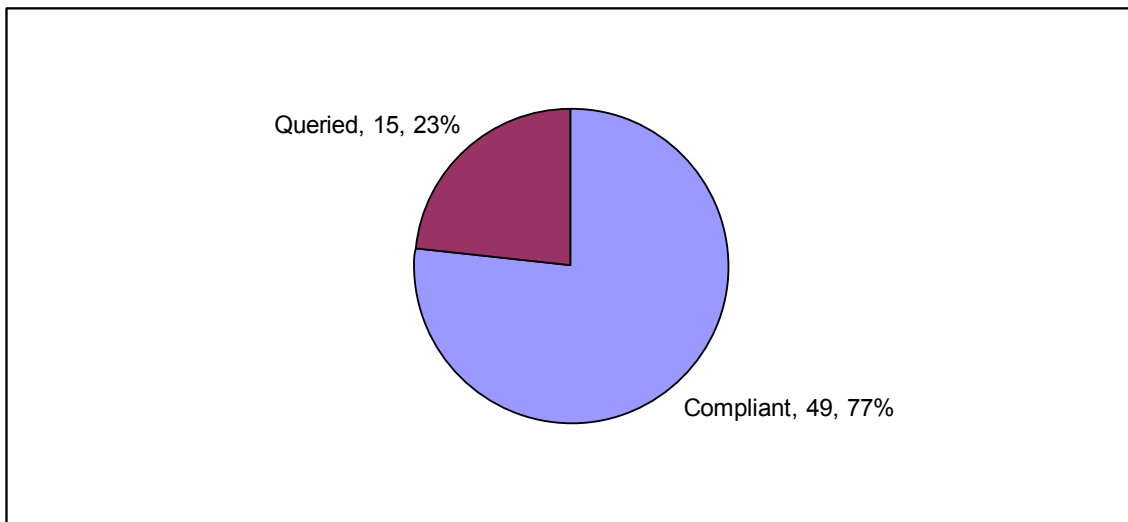


#### d. Poland

64 alcoholic drink creatives in the monitored period

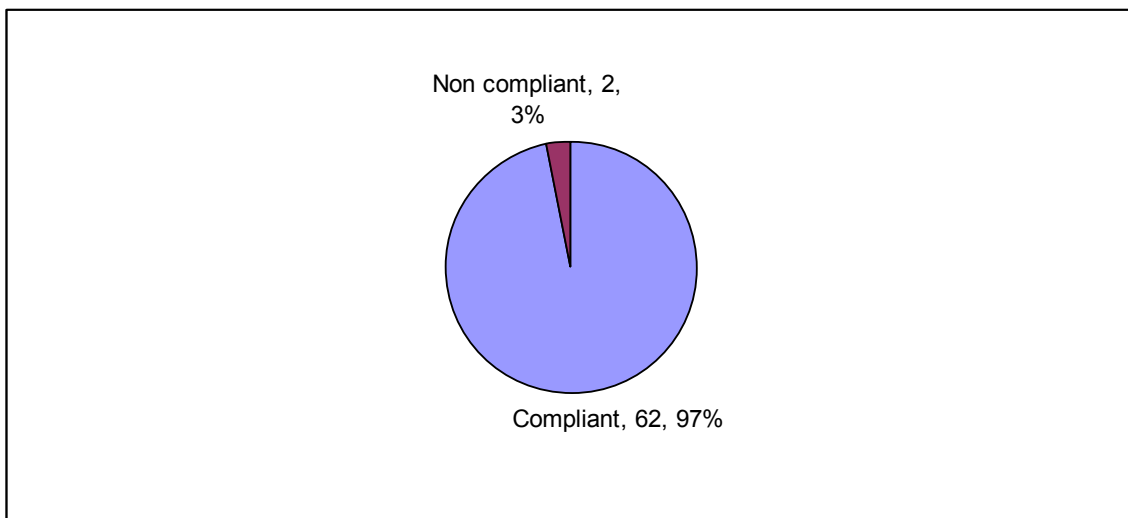
15 potential non-compliance instances – ads with no RDM

**Graph I:**  
**Poland - Compliance ratio**



Confirmed non-compliance instances – ads with no RDM which according to the terms of the Commitment should have had an RDM

**Graph J:**  
**Poland – Final compliance ratio**

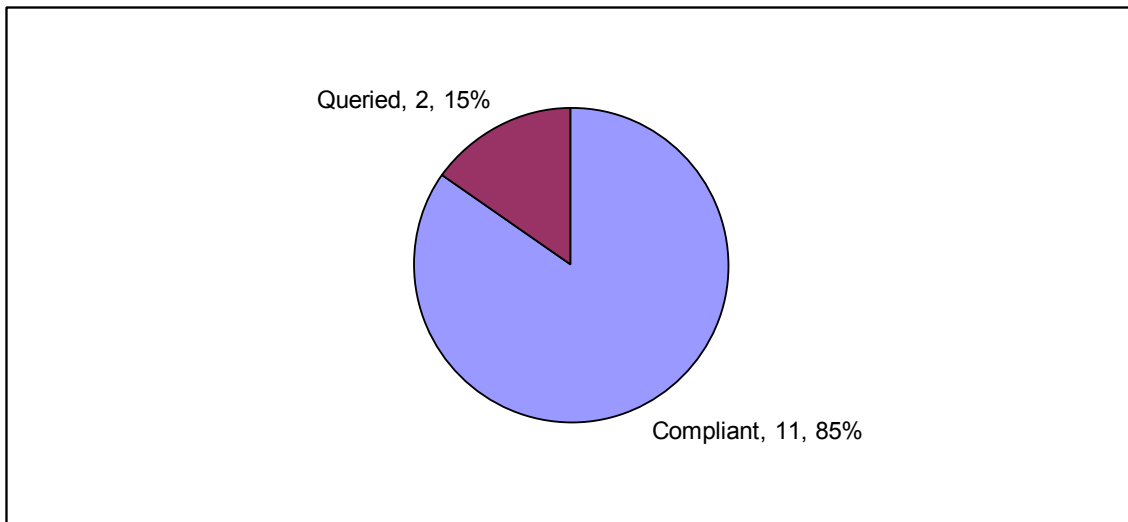


**e. Romania**

13 alcoholic drink creatives in the monitored period

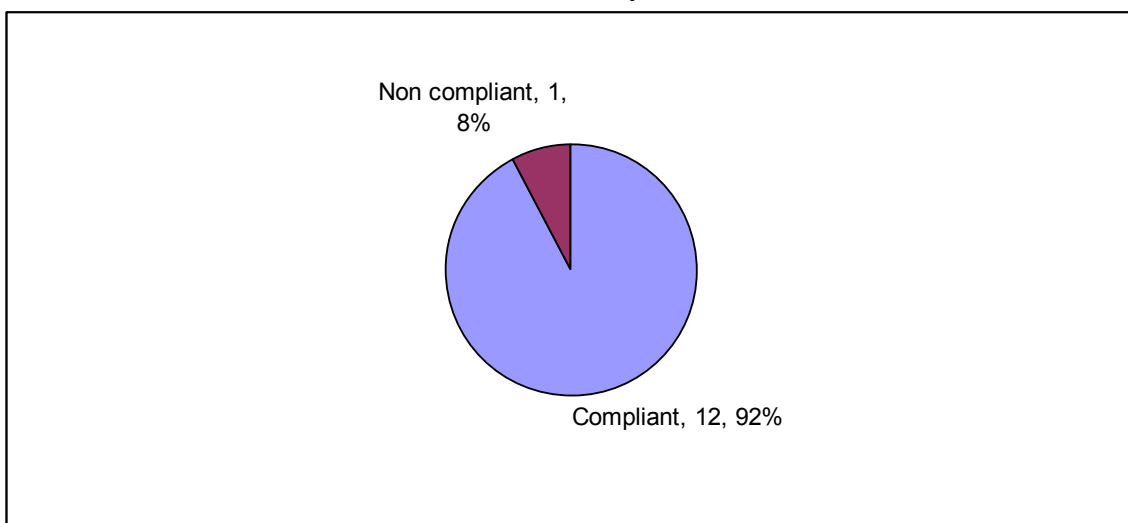
2 potential non-compliance instances – ads with no RDM

**Graph K:  
Romania - Compliance ratio**



Confirmed non-compliance instances – ads with no RDM which according to the terms of the Commitment should have had an RDM

**Graph L:  
Romania – Final compliance ratio**



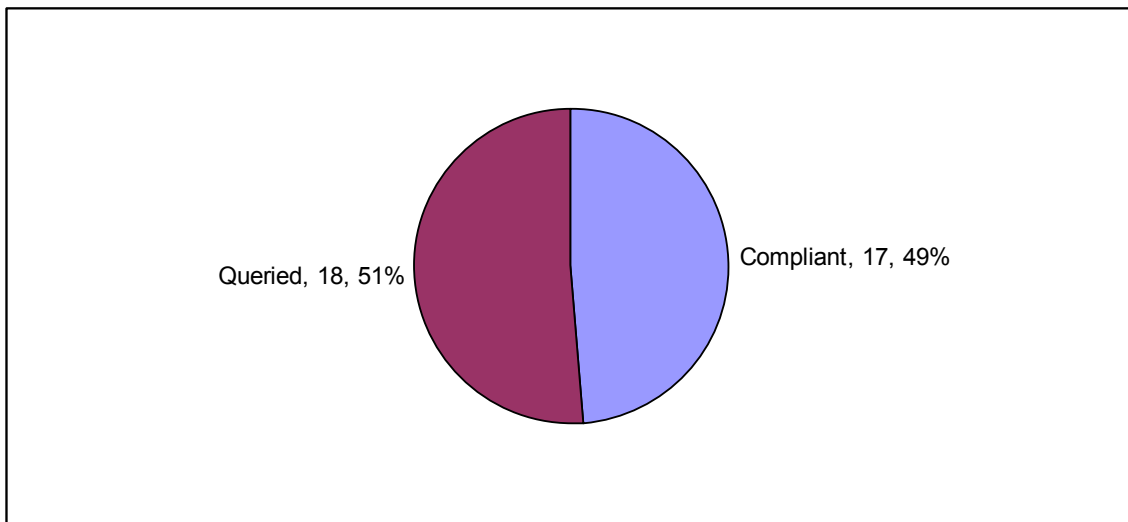


**f. Slovakia**

35 alcoholic drink creatives in the monitored period

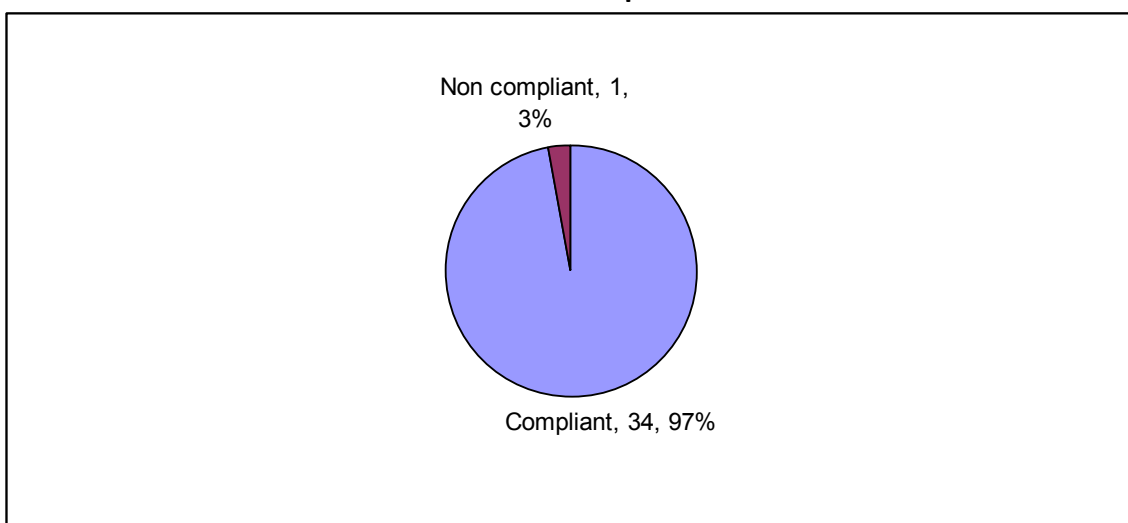
18 potential non-compliance instances – ads with no RDM

**Graph M:  
Slovakia - Compliance ratio**



Confirmed non-compliance instances – ads with no RDM which according to the terms of the Commitment should have had an RDM

**Graph N:  
Slovakia – Final compliance ratio**



## **5 Qualitative Review results**

All monitored ads were reviewed visually against the two parts of the SABMiller guidelines.

- Responsibility messages should be accurate, balanced and meaningful with regard to discouraging irresponsible drinking in the local context
- Responsibility messages should be clearly visible or audible in the particular medium in which they are used

For those with an RDM, the following considerations were taken

- ‘Accurate, balanced and meaningful’

Message specific, avoiding vague general statements about ‘responsible drinking’

- ‘Clearly visible or audible in the particular medium in which they are used’

Size of the message – meeting the guideline of 5-10% of the ad

This was assessed in terms of space for print; in terms of time for TV; and in terms of time and space for Internet

Placement of the message – location on the page/in the spot

Clarity of the message – copy/logo easy to read

Additionally, consideration was given to the consistency of RDMs used in each country.

### **a. Global results**

Based on the sampling in this project, RDMs are in the vast majority accurate, balanced and meaningful.

The small number of RDMs with vague mentions of ‘responsible’ drinking are for the most part found in executions first aired/published in 2010, and in all cases no later than July 2011.

Performance on the ‘visible/audible’ measure is more mixed.

In several countries, notably Poland and Italy, a minority of RDMs are too small in Print and TV creatives.

There are some questions about the placement of RDMs in TV creatives – those which appear in the last 3-4 seconds of the ad are the clearest, while those which appear for 3-4 seconds at other points in the spot, for example right at the beginning or more notably at some point during the spot, were very difficult to pick up and were in some cases missed on the first or even second viewing when monitored.

There is also further development work to be done on Internet advertising – RDMs are generally of suitable size on the frame of the Internet ad in which they appear, but where there are multiple frames, this effect is diluted.

In addition, where there are multiple frames and the ad takes time to play out, the RDM may not be seen at all by consumers, given the relatively short dwell time to be expected when Internet users interact with online creatives.

The commitment guidelines lack clarity on whether it is time or space which should be measured in this medium – further thought on this topic is recommended.

Four further points are noteworthy in this qualitative analysis:

#### 1) The letter of the commitment vs the spirit of the commitment

As the figures demonstrate, many of the instances of apparent non compliance, where no RDM appears, can be explained by close reference to the terms of the Commitment – that the creative is PR content, or an advertorial for example.

However, the experience of monitoring this Commitments demonstrates that it is not always clear to an independent third party, and therefore to a consumer, that creatives with prominent branding or placement of product images are not advertising.

The addition of RDMs to such materials could be considered as a next step in the evolution of the terms of the Commitment.

#### 2) Choice of RDM

In Poland, the significant majority of creatives (44 of 52) with an RDM used a message based on 'I don't drink alcohol when pregnant'.

This message is valid and worthy, but seems ill suited to the target male demographic.

#### 3) Application of exceptions

There are a handful of examples of inconsistency between countries where an RDM appears in an advertorial/editorial in one market but not in another (eg appears in Poland; does not appear in Slovakia).

This inconsistency can be addressed as the Commitment evolves.

#### 4) Size of ads covered by the Commitment

A large majority of the queries raised by this monitoring project where a Creative lacked an RDM are answered by the size of the creative being smaller than A4 and therefore not part of the Commitment.

However, promotional items such as beer mats, usually much smaller than A4, are covered by the terms of the Commitment.

Again, we recommend review of this issue as the Commitment terms develop.

## 6 Conclusions

Based on the sampling in this project, it is clear that only a very small proportion of creatives have been aired or published without an RDM.

**Compliance rate in sample period – 98%**

**Compliance with the Commitment would appear to be strongly established**

Qualitatively, the RDMs are accurate, balanced and meaningful in the very large majority of cases – and in all cases since August 2011

**Qualitative compliance rate in sample period – 94%**

**Compliance would appear to be strongly established among Commitment signatories**

However, there is still some room for improvement in the size and clarity of the messaging.

**Qualitative compliance rate in sample period – 82%**

**Clarity and visibility of messaging is well established in line with the Commitment, but more can be done to strengthen this action**

As the monitored territories were selected as a representative sample of activity in EU markets, this compliance rate may be viewed as representative for the EU as a whole.

# Annex II - KPMG Limited Assurance Report

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## **Independent assurance report**

### **To the readers of SABMiller's - Presence of Responsible Drinking Messages in Packaging, Labelling and Advertising – Compliance monitoring report**

We have been engaged by the Board of Management of SABMiller Europe AG to provide assurance on the information in the section "3. Compliance monitoring: Labelling and packaging" (hereafter: the Compliance Information) of the Final report to the EU Alcohol and Health Forum called "SABMiller; Presence of Responsible Drinking Messages in Packaging, Labelling and Advertising; Compliance monitoring report" (hereafter: the Report). It is the responsibility of the Board of Management of SABMiller Europe AG to draft the Report. It is our responsibility to provide assurance on the Compliance Information.

#### **Scope**

SABMiller describes in its Report the results of its commitment 1273681242343-1080 (hereafter: the Commitment) to the European Alcohol and Health Forum. Our engagement was designed to provide limited assurance on whether the Compliance Information properly reflects, in all material respects, the implementation of the Labeling and packaging requirements in accordance with the Commitment.

#### **Criteria and assurance standard**

SABMiller reports the compliance information in accordance with the criteria of the Commitment. SABMiller provides further explanations of the Commitment, operationalization thereof and its coverage in the Report on page 9-10 and in the Compliance Information section in the Report. It is important to view the Compliance Information in the context of this explanatory information. We believe that the criteria are suitable in view of the purpose of our assurance engagement.

We conducted our engagement in accordance with the International Standard for Assurance Engagements (ISAE) 3000: Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. This standard requires, among others, that the assurance team possesses the specific knowledge, skills and professional competencies needed to understand sustainability information, identify and collect the thereto related assurance information and that they comply with the requirements of the Code of Ethics for Professional Accountants from the International Federation of Accountants to ensure their independence.

#### **Work undertaken**

We have performed the procedures deemed necessary to obtain the evidence that is sufficient and appropriate to provide a basis for our conclusions. Our procedures for the information for which limited assurance was provided, included:

- Interviews with relevant staff during country visits and at corporate level;
- Three country visits to review relevant data, information systems and warehouse labeling stocks;
- Reviewing internal and external documentation to determine whether the data in the Compliance Information section is supported by sufficient evidence;
- Data review at corporate level on the relevant, aggregated country data.

During the assurance process, we discussed changes to the Compliance information, and reviewed the final version to ensure that it reflects our findings.

## **Conclusions**

Based on our procedures, nothing came to our attention to indicate that the Compliance Information does not properly reflect, the implementation of the Labeling and packaging requirements in accordance with the Commitment.

Amsterdam, April 13, 2012

KPMG Sustainability

Part of KPMG Advisory N.V.

W.J. Bartels RA, partner

# Annex III – RDM Awareness Tracking Survey – Questionnaire

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## QUESTIONNAIRE (BASIC MODULE):

- Q1. On their packaging or in their communication, beer companies place messages that encourage people to adopt responsible behaviors. What messages of this kind have you ever seen or heard of? SPONTANEOUS RESPONSE
- Q2. And which of these messages have you ever seen or heard of? PROMPT TILL THE RESPONDENT CANNOT RECALL ANOTHER RESPONSIBILITY MESSAGE
- Q3. Which did you notice on beer's packages?
- Q4. Which did you notice on beers adverts, that is whilst watching TV, at the cinema, on billboards, surfing the internet or reading newspapers or magazines

## Data source:

Brand tracking questionnaires in SABME

	Sample size	Reported period	Data provider
Czech R.	275	Dec 2011	TNS
Slovakia	435	Jan 2012	TNS
Poland	620	Nov 2011	Millward Brown
Hungary	780	Nov 2011 - Jan 2012	Nielsen
Romania	1058	Nov 2011	Synovate
Netherlands	557	Oct - Dec 2011	MetrixLab
Canary Islands	363	Nov - Dec 2011	Edei
UK	383	Dec 2011	TNS