



Responsible Marketing and Communications Code 2.0

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May 2016

A Word from Our CEO

At Anheuser-Busch InBev, we brew our beers to be enjoyed responsibly by individuals of legal drinking age. We take great pride in our global and local brands. Our beers are natural products, carefully crafted from premium ingredients that provide great enjoyment to our consumers.

As a leading global consumer products company with a Dream to be the “Best Beer Company Bringing People Together For a Better World,” we always market and promote our beers in a responsible way. Our vision is to foster a culture of smart drinking globally. As such, we are dedicated to promoting smart consumption and reducing the harmful use of alcohol, which ties to how we market and communicate about our products.

The Anheuser-Busch InBev Responsible Marketing and Communications Code is designed to help ensure that all of our colleagues, as well as our business partners, demonstrate best-practice leadership in this area.

We recognize that as the largest brewer in the world, we have a great responsibility to ensure that our communications are honest, truthful, keep with contemporary standards of good taste, and are sensitive to cultural differences between markets. Compliance with the Code is mandatory for all of our marketing, sales, promotion and communications efforts and includes both traditional and digital media.



Putting our Responsible Marketing and Communications Code into practice every day is part of our company's strong tradition of corporate responsibility that dates back nearly a century. Because we care about the well-being of people as well as the reputation of our company and our brands, we are committed to marketing and promoting all of our products responsibly.

All the best,

Carlos Brito
Chief Executive Officer

A handwritten signature in black ink, which appears to read "Brito".

Introduction

Beer is regularly enjoyed by people the world over and has been an integral part of society for centuries in many cultures around the world.

When consumed responsibly, beer can be part of a balanced and healthy lifestyle for most people.

Commercial communications play a fundamental role in the success of a free market economy. They facilitate competition and allow for new products to be introduced to consumers.

As responsible brewers, we want to ensure that our commercial communications are directed only to those above the legal drinking age and are carried out in a socially responsible manner. Legal drinking age refers to the age by which individuals may lawfully drink or purchase alcohol beverages, whichever is greater. For those countries that have no minimum legal drinking age, it is AB InBev's policy not to direct its marketing activities to individuals below the age of 18.

When applying the Code, we will be sensitive to local and cultural differences between the markets.

The Code shall be used as a company reference for all commercial communications and shall be regarded as the minimum standard.



General Principles

All forms of commercial communications involving Anheuser-Busch InBev beer brands shall:

- be legal, ethical, honest and truthful.
- be prepared with a core sense of social responsibility and be based on principles of fairness and good faith.
- reflect generally accepted contemporary standards of good taste and decency.
- be sensitive to cultural differences between markets.

The Code shall be used as a company reference for all commercial communications and shall be regarded as the minimum standard.

Scope of the Code

The Code applies to all forms of brand marketing or commercial communications for all AB InBev products in our markets that carry a beer/alcohol trade (including low or no-alcohol beer) name and/or taste profile including:

- advertising (traditional and digital media, trade)
- social media
- sponsorships (events, product placement, celebrities, influencers)
- experiential (events, promotional activities)
- relationship marketing
- consumer and trade public relations
- branding, packaging and labeling
- point of connection (materials, sampling, merchandising)



The Code does **not** apply to:

- the use of materials or messages designed specifically to address issues of alcohol awareness, abuse, drink driving, underage drinking, over-consumption.
- motion picture, television, video, and stage plays that may use AB InBev products without express permission from our company.
- communications in which AB InBev was neither involved in the creation, nor in the distribution of the content and did not officially endorse the content.
- educational/social awareness campaigns and promotion of cultural/tourism activities such as brewery visitor attractions.

1. Responsible drinking

- I.** We will not depict situations where beer is being or has been consumed excessively or in an irresponsible way; neither will we imply that such situations are acceptable.
- II.** We will not present abstinence or moderation in a negative way. There are situations or times when consuming alcohol beverages may not be appropriate, and we will always respect an individual's choice not to drink.
- III.** Our marketing materials will not portray pregnant women drinking our beer or be directed to pregnant women, or imply that drinking while pregnant is acceptable.
- IV.** Our advertisements will not depict actors using violent, antisocial or excessive behavior that is not clearly recognizable as humor, parody, satire or spoof.
- V.** Our advertisements will avoid any association with, acceptance of, or allusion to drug culture or illicit drugs.
- VI.** AB InBev-sponsored promotional activities will not encourage irresponsible consumption of our products, either through volume, time span or in any other way. No pressure will be placed on people to participate in our promotional activities.
 - a.** In particular, our marketing materials or promotional activities will not include and/or promote drinking games or utilize drinking vessels, gimmicks, sprays, inhalers or other drink dispensing mechanisms where the consumer does not have control over the delivery of the alcohol consumed.
 - b.** To avoid correlation of our brands with over-consumption, we will limit Open Bar sponsorships to events where consumption of our beer products is guaranteed to be responsible and strictly limited to people of legal drinking age.
- VII.** We will strive to ensure that all AB InBev advertising (i.e. print, electronic, digital, out-of-home ads) and websites carry a clear, easy-to-read responsible drinking message, where feasible.
- VIII.** For product placements, we will not grant permission for our products or other properties to be used in a way that, in our judgment, would misrepresent the company's position on responsible drinking. Specifically, we will not grant permission to use our products or properties if:
 - a.** A character's drinking is not, in our judgment, appropriate, legal or responsible.
 - b.** A character associates our products with illegal underage drinking, public drunkenness, drink driving, alcoholism or other abuse of alcohol.
- IX.** At AB InBev brand-owned events, we will provide for the availability of no-alcohol beverages. At non AB InBev brand-owned events, we will suggest that no-alcohol beverages be made available.
- X.** Our marketing leaders may consider not airing an advertisement, postponing its release, and/or recalling an advertisement for any relevant reason, including local culture or practice, or a change in circumstances.

2. Legal drinking age

AB InBev's beer marketing is directed at individuals of legal drinking age and above. In the Code, 'legal drinking age' refers to the age by which individuals may lawfully drink or purchase alcohol beverages, whichever is higher. For those countries that have no minimum legal drinking age or for those that have legal drinking ages below 18, it is AB InBev's policy not to direct its marketing activities to individuals below the age of 18.

No AB InBev or AB InBev subsidiary's beer marketing will be directed to individuals below the legal drinking age. AB InBev's commitment to this principle will be supported by the following provisions:

- I. We will not employ any symbol, image, object, cartoon character, celebrity, music, language or other content that is intended to appeal primarily to children or adolescents.
- II. All actors and models shown drinking and/or actively promoting our beer in any marketing materials must be at least 25 years old and must not appear to be younger than 25 years old. Celebrity spokespersons, as well as individuals or teams involved in promotions for our brands in the on-/off-trade must be at least of legal drinking age or 18, whichever is greater, and must reasonably appear to be 18 or older. Furthermore, a minimum of 70% of the celebrity's fan base shall be reasonably expected to be of legal drinking age or older.
- III. So that no one mistakes our advertising as being directed to underage individuals, we will aim to place our marketing materials in media (traditional and digital) where a minimum of 70% of the media's audience is reasonably expected to be of legal drinking age or older. We recognize that at the time of placement, audience composition is predicted based on past experience.
 - a. We will work closely with our agencies and media buyers to predict as accurately as possible that at least 70% of the audience will be above the legal drinking age.
 - b. We will comply with stricter laws and industry self-regulatory audience composition standards where required.
 - c. Website advertising must only be placed where at least 70% of visitors are of legal drinking age or above (in the country of consumer access); or may be placed on websites where the dissemination of the message is restricted to only registered users of that website who are of legal drinking age in the country where the content is intended to be accessed, based on individuals' personal profiles within such websites (e.g., Facebook profiles).

2. Legal drinking age (Continued)

- d. We will ask our media partners to provide – where available – post-monitoring reports on audience composition at half-yearly intervals to verify compliance to the highest practical level.
- IV. We will ensure that all AB InBev websites use an age-affirmation mechanism (e.g. Age Gate) to deny access to those who are under the legal drinking age, except for platforms that operate from a registered user database.
- V. We will aim to send e-mails or other relationship marketing outreach only to individuals who have selected to opt-in beforehand and affirmed to be of legal drinking age or older.
 - a. Digital communication created by or under AB InBev's control:
 - i. shall be directed to individuals who affirmed to be over the legal drinking age, and,
 - ii. shall include a reminder to the user not to send to those who are under the legal drinking age.
 - b. Downloadable applications are acceptable so long as they avoid primary appeal to those below legal drinking age and include an age-affirmation mechanism if the downloader's age has not been verified.
- VI. We will not sponsor or direct our marketing activities at events where the majority of the audience is expected to be below the legal drinking age. This guideline does not prevent the company from having advertising and marketing at locations that are used primarily for adult-oriented events, but which occasionally may be used for an event where most attendees are under the legal drinking age.
- VII. For paid outdoor media campaigns, we will take all reasonable steps to ensure that our advertisements are not placed in close proximity to elementary or secondary schools, places of worship or public playgrounds.
- VIII. We will not allow our brand logos or trademarks to be licensed for use on materials or merchandise intended for use primarily by persons below the legal drinking age, such as toys or children's clothing.
- IX. We will take all reasonable steps to ensure that AB InBev-sponsored promotions will not allow sampling to anyone below the legal drinking age. Our promotions staff will be trained to request proof of age and will be directed to refuse to serve samples to underage individuals.

2. Legal drinking age (Continued)

- X.** Regarding product placements, we will not grant permission for our products or properties to be used when, in our judgment:
 - a.** A character under the legal drinking age is depicted purchasing or drinking alcohol illegally.
 - b.** The motion picture or television show is one for which at least 70% of the audience cannot be reasonably expected to be above the legal drinking age.
 - c.** The proposed use might in any way misrepresent AB InBev's commitment to help prevent illegal underage drinking or might reasonably imply that AB InBev condones underage drinking.

3. Hazardous activities

- I.** Our marketing materials or promotional activities will not portray consumption during or immediately prior to activities (or in locations) that are potentially hazardous, such as driving a motor vehicle or operating other potentially dangerous equipment or machinery. We will comply with the law of the country where a particular communication is made.
- II.** Success in a potentially hazardous activity will not be portrayed as depending on the consumption of our beer. It is, however, acceptable to show a participant enjoying our beer in a relaxing, celebratory or team setting after the event.
- III.** AB InBev staff in charge of AB InBev-sponsored promotional events will be encouraged to promote alternative transport means for the participants to return home safely. This could be through cooperation with local taxi cab companies or local city authorities to guarantee easy access to safe transport.
- IV.** When the consumption of alcohol-free or no-alcohol beer entails no greater risk with potentially hazardous activities, these occasions may be portrayed in our advertising. In this case, we will take extra care to make the absence of alcohol clear so that the product cannot be mistaken for a beer that contains alcohol.

4. Health or functional attributes

- I. We will not promote our beer in a way that claims it can prevent, treat or cure medical conditions.
- II. We do not market or advertise our products (i) as providing certain health benefits or (ii) primarily based on their alcohol content, except that we may favorably highlight a product's lower alcohol content.
- III. Our marketing materials or promotional activities should not create any confusion as to the alcohol strength of our products.
- IV. We will comply with the law of the country where a particular communication is made. For global campaigns, we will, in our discretion, consider the use of the most restrictive standard.

5. Performance or success

Responsible beer consumption is associated with pleasurable social experiences and social ties, and can be portrayed as such. However, in terms of promoting our brands:

- I. Our commercial communications will not imply that consumption of beer is a requirement for social acceptance or professional, educational or financial success.
- II. Our commercial communications will not suggest that the consumption of our products enhances sexual capabilities, attractiveness or leads to sexual relations.
- III. Our commercial communications will not create the impression of a link between the consumption of our products and success/performance when engaging in sports or potentially hazardous activities.

6. Digital media

Digital media is a key channel of our communications, which includes but is not limited to:

- websites under AB InBev's control
- paid search
- display ads (moving and non-moving)
- interactive TV ('red button')
- e-mail
- SMS and MMS messages on mobile devices
- AB InBev-written/-endorsed product reviews
- in-game advertising
- user-generated content (UGC) under AB InBev's control
- viral advertising under AB InBev's control
- social media brand pages or channels, including but not limited to Facebook, Instagram, Pinterest, Tumblr, Twitter, YouTube, etc.
- downloadable applications (apps)

In our digital communications activity, we must take a responsible approach to ensure we will not market towards those below the legal drinking age, respect privacy and intellectual property issues.

- I. All AB InBev brand and corporate websites must contain an age-affirmation mechanism. These websites and sponsored sites (e.g. Facebook pages, Twitter feeds, apps, etc.) should also carry responsible drinking messages.
- II. User-generated content (UGC) created by consumers may include text, video, audio, photographic, or any other type of media/information submitted by users to message boards, blogs, photo/video-sharing websites, social network sites and any other interactive websites. If this content is placed on channels that we control (AB InBev brand and corporate sites), we will monitor it and remove any inappropriate content within 48 hours of when it is posted. If this content is placed on channels we do not control, we are not responsible for its compliance with our Code. Content created by AB InBev must always be transparent in showing the commercial nature of the communications and must not be confused with UGC.
- III. E-mails must not be sent to any individual below the legal drinking age. Any e-mail that is designed to be forwarded should also contain instructions for the recipient that he or she should not forward the message to individuals below the legal drinking age.

6. Digital media (Continued)

- IV. We will respect strict rules about the use of consumers' online data for marketing and have clear data privacy statements that we encourage our consumers to read.
- V. Any type of relationship marketing AB InBev uses will be permission-based, meaning that we will require recipients of marketing e-mails and mobile messages to opt-in beforehand to receive such messages, and we will provide an opt-out function which easily allows consumers to stop receiving communications from us.
- VI. At the different points where AB InBev might collect data for relationship marketing purposes, we alert the users and encourage them to find out how the information will be used, as well as giving consumers the choice to opt-out of the data processing. We will provide reasonable security for, and limited retention of, the data collected in compliance with applicable laws and regulations.
- VII. If we, or third parties working on our behalf, collect 'clickstream' data for the purposes of behavioral advertising to our website visitors, we will alert the users to this, and we will give them the opportunity to opt-out of such practices. Any third-party providing online behavioral advertising (OBA) on behalf of AB InBev should comply with existing self-regulatory programs offering transparency and control for consumers – such as www.edaa.eu in Europe and www.aboutads.info in the U.S.



7. No-Alcohol Beer Products

For the purpose of this Code, “No-Alcohol Beer Products” are defined as all AB InBev beer products with an ABV of 0.0% to 0.5% (e.g. Budweiser Prohibition Brew; Brahma 0.0%; Beck’s Non-Alcoholic, O’Doul’s Non-Alcoholic Brew).

Requests for exceptions to the “No-Alcohol Beer Products” principle can be submitted to the Global Legal & Corporate Affairs team.

In all forms of commercial communications for no-alcohol beer products that carry a beer/alcohol trade name, we will adhere to the following provisions:

Don’ts:

- We will not portray pregnant women.
- We will not portray persons under the legal drinking age.
- We will not allow no-alcohol beer product logos or trademarks to be licensed for use on materials or merchandise intended for use by persons below the legal drinking age.
- We will not endorse celebrities below the age of 18.
- We will not sponsor or direct our marketing activities at events where the majority of the audience is expected to be below the legal drinking age.

Do’s:

- In general: for AB InBev’s no-alcohol beer products we will adhere to all provisions under the “Legal Drinking Age” & “Digital” principles (e.g. 70% rule for media placements; age-affirmation mechanism on AB InBev digital communications channels).
- We will ensure that advertisements for no-alcohol beer products carry a clear, easy-to-read responsible drinking message, where feasible.
- We may make reasonably substantiated health or functional benefit claims for no-alcohol beer products, as long as the product is clearly recognizable as alcohol-free, applying the local definition of “alcohol-free”.
- If an AB InBev no-alcohol beer product is intended to be portrayed as a beverage which contains no alcohol, permission for product placement can be granted if the following provisions are met:
 - The product is clearly recognizable as a no-alcohol beer product.
 - Any character associated with the no-alcohol beer product is at least of legal drinking age or 18, whichever is greater.

Compliance with the Code

Compliance with the Code is mandatory for all our operations. Where national laws, regulations or self-regulatory Codes apply to our commercial communications, these must be respected in addition to the criteria set out in the AB InBev Code. The responsibility of compliance with our RMCC as well as national laws, regulations and self-regulatory Codes lies solely with the Zone Marketing VPs.

We strongly believe in a robust compliance program and internal review & approval process. Compliance with the Responsible Marketing & Communications Code (RMCC) is everyone's responsibility. In order to ensure practical compliance:

- I. All AB InBev Sales and Marketing teams (incl. Media Planning and Buying, Innovations, Promotion, Event and Sponsorship etc.), as well as external Advertising, Promotion, Event, Sponsorship, Design and Public Relations teams shall follow both the letter and the spirit of the RMCC.
- II. All AB InBev Sales, Marketing, Corporate Affairs and Legal teams shall receive annual training on, and agree to comply with the RMCC. New employees shall receive training within 60 days of employment. An online training module is available.
- III. All of AB InBev's marketing agencies shall also complete annual training on the RMCC. Compliance with this training requirement is the responsibility of the Zone Marketing VPs.
- IV. All written contracts and project briefs with all suppliers involved in AB InBev's commercial communications will include an understanding that it is obligatory to abide by the guidelines of the RMCC. A copy of the RMCC must be attached to such contracts.
- V. Pre-clearance, where required, and guidance on Code compliance must be sought by the Marketing/Sales department from the Corporate Affairs and Legal teams and should take place as early as possible in the creative process. A standardized RMCC Review and Approval Process Map, which includes the appropriate process, contacts and submission form, is available for each country and at the global level.

For any questions concerning AB InBev's Responsible Marketing and Communications Code, please contact your local Legal or Corporate Affairs team if you are located in a business unit. For further questions, please contact Ricardo Rolim, Global VP, Sustainability at Ricardo.Rolim@ab-inbev.com

