

# OUR RESPONSIBLE MARKETING CODE

# OCTOBER 2018



DEFINITIONS	HOW TO APPLY THE RESPONSIBLE MARKETING CODE	COMPLIANCE	PRINCIPLE ADULT APPEAL	1	PRINCIPLE WE ACTIVELY RESTRICT EXPOSURE OF OUR BRANDING TO MINORS	2	PRINCIPLE WE ARE ALWAYS LEGAL, ETHICAL AND TRUTHFUL	3	PRINCIPLE WE ADVOCATE DRINKING RESPONSIBLY, MODERATION AND GENERAL SAFETY	4	PRINCIPLE WE DO NOT ASSOCIATE OUR BRANDS WITH ANTI-SOCIAL BEHAVIOUR OR OVERCONSUMPTION	5	PRINCIPLE WE NEVER CLAIM THAT CONSUMING OUR BRANDS LEADS TO SOCIAL OR SEXUAL SUCCESS OR ENHANCED PERFORMANCE	6	PRINCIPLE WE ARE COMMITTED TO OUR BRANDS BEING PART OF A BALANCED LIFESTYLE	7	PRINCIPLE WE ARE PROGRESSIVE ABOUT CULTURAL CONTEXT AND ITS EVOLUTION	8	EXTERNAL REFERENCES
-------------	---	------------	---------------------------	---	--	---	--	---	--	---	---	---	---	---	--	---	--	---	---------------------



# OUR RESPONSIBLE MARKETING CODE

Creating memorable brand experiences for our consumers is something every HEINEKEN employee does. A brand is more than a logo or a clever tagline... it's what people think of when they hear our name. It's how the public perceives, enjoys and trusts our brands. And for that very reason, brand reputation is hard won, but very easily lost.

We value above all else, the experience our consumers and customers have with our brands. For many consumers, the experience of our brands starts before they try on of our products, through marketing and commercial communication. For those that have already tried our brands, our communication and marketing approach reinforces their views and perceptions about our brands. You therefore play a very important role in the way consumers perceive our brands.

We need to ensure that when we talk about our brands, we always do so in the right way, in the right place and at the right time. And we need to do all of that in a responsible way, so that our brands are enjoyed in the way they're intended. That's why we have the Responsible Marketing Code ("The Code"). It's here to protect our license to operate, our brands, but more importantly, protect and respect society and our consumers.

This updated Code replaces the previous of the Responsible Marketing Code, with effect from 1st September, 2018. It addresses our vibrant and growing Low and No Alcohol business, our initiatives within the field of digital media (including social media and e-Commerce), the additional requirements of various self-regulation initiatives (such as the Responsible Marketing Pact, Digital Guiding Principles, etc.) and external EU legislation. We have included additional guidance on these topics to ensure a better understanding and compliance with the Code. Just like its predecessor it is also written in simple terms. It's very clear about:

- ▶ The challenges we face as a company in an ever changing business environment.
- ▶ The questions we need to ask ourselves and the checks we need to meet, before our marketing and commercial communications can be shared.

The Code shall be regarded as our minimum standard and shall be used as reference for all our marketing and commercial communications, regardless of media. Compliance with The Code is mandatory for everyone internally, including our subsidiaries and joint ventures where we have a controlling interest. The Code is applicable to agencies and other third parties,

suppliers and consultants involved in the marketing and sales of our brands. That's why it covers everything from point of sale to sporting event sponsorships, social media and much more.

Please make The Code part of the way we all do business, so that we can continue to live by our values – respecting individuals, society and the environment.

Thank you.

Jan-Derck van Karnebeek  
Chief Commercial Officer  
Date: September 1st, 2018

Blanca Juti  
Chief Corporate Affairs Officer  
Date: September 1st, 2018

# DEFINITIONS

**Age Affirmation:** A screening process or mechanism by which consumers disclose their Date Of Birth and country of access to affirm they are over LPDA or 18+. There are various methods depending on the media channel to affirm that consumers are LPDA or 18+:

- ▶ An affirmation website page that requires consumers to provide their Date Of Birth;
- ▶ A check against a third party LPDA+ registered database (e.g. Facebook);
- ▶ A check at an event by means of ID.

**Alcohol Brands:** Company Owned or Controlled brands where one or more of the variants in the distributing country include an ABV of 3,5% or more. It includes alcoholic variants of beer and cider brands but not soft drinks or malted beverages without an alcoholic variant.

**Alcohol Content or Alcohol by Volume (ABV):** Alcohol by volume is a standard measure of how much alcohol is contained in an alcoholic beverage. It's expressed as a percentage of total volume.

**Audience Verification:** Determining if 70% or the OpCo's locally required percentage (e.g. 71,6% in the US and 75% in the UK) of a channel's audience is over the LPDA or at least 18+.

**Brands:** All Company Owned or Controlled Alcohol Brands and LNA Brands.

**Brand Promoters:** Brand Promoters play an important role promoting our brand portfolio to customers and consumers at point of sale and at events throughout the global HEINEKEN business. Their role is to promote our brands, provide samples, serve or sell drinks in bars, clubs, restaurants, shops or at events. Brand Promoters can be employed directly by HEINEKEN or through an agency or distributor on our behalf.

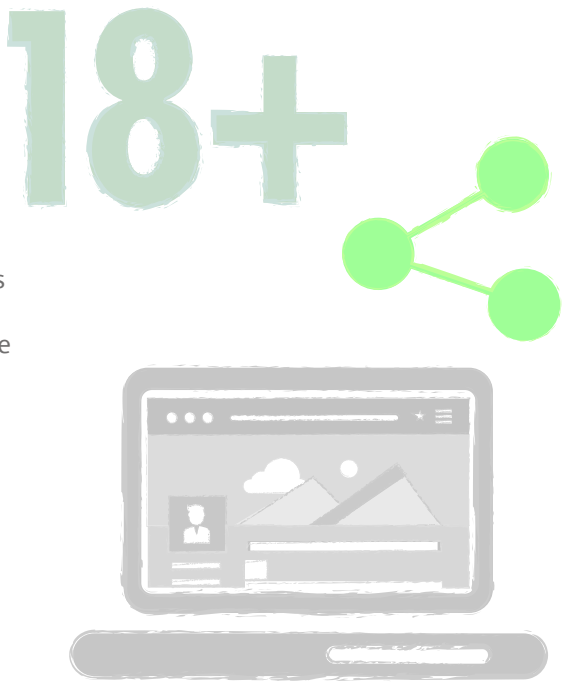
**Brewing A Better World:** Launched in 2010, it's our long-term approach to creating a shared, sustainable value for our Company, society and the planet. It is one of our strategic priorities as a company and the key areas of focus are: protecting water resources, reducing CO2 emissions, safety, and advocating responsible consumption.

**Company Owned or Controlled:** All of the brands in our OpCo portfolios (including those third party brands that we produce, market and sell under license) as well as any brands we own but license to others (or manage through a joint venture).

**Date Of Birth:** the full date of birth (dd/mm/yy).

**Digital Media:** All marketing and commercial communication by means of digital technology which includes social media and e-Commerce that we have under our control. It includes but is not limited to:

- ▶ Brand websites
- ▶ e-Commerce websites
- ▶ Social media platforms such as Facebook, Twitter, Instagram, YouTube etc.
- ▶ Digital ads
- ▶ Banners, pop-ups, takeovers, etc.
- ▶ Downloadable applications (apps)
- ▶ User Generated Content (UGC), if under our control
- ▶ email
- ▶ In-game advertising
- ▶ Smart devices (i.e. beer mat, smart home, etc.)



# DEFINITIONS

**Legal Purchase and/or Drinking Age (LPDA):**  
The youngest age a person is legally permitted to purchase and/or drink alcoholic beverages within a specific country. This varies from country to country. NOTE: If the local LPDA is below 18 or absent then use 18 as a minimum.

**Low & No-Alcohol (LNA) Brands:** Company Owned or Controlled brands with an ABV less than 3.5%. It includes non-alcoholic variants of beer and cider brands but also includes soft drinks or malted beverages without an alcoholic variant.

**Minor:** anyone under LPDA. If in a specific country the LPDA is set below 18 years of age or has not been defined by law, we consider everyone under the age of 18 a minor.

**OpCo:** Heineken Operating Company.

**No-Alcohol Brands:** LNA brands with an ABV of 0.0% - 0.5%. No-Alcohol Brands also include our 0.0% Brands.

**0.0% Brands:** LNA brands with an ABV of 0.0% - 0.05% that are marketed under name of an Alcohol Brand that are available in the market as a beer product. It also covers non-alcoholic variants of beer and cider brands.

**Primarily Appeal to Minors:** When something has a greater appeal or is more attractive to Minors than LPDA consumers.

**SLAs:** A service level agreement – an agreement between a service provider and the user that defines the level of service expected from the service provider.

**70/30 Rule:** When 70% of the audience is reasonably expected to be persons above LPDA, marketing or commercial communications shouldn't appear on the chosen media channel if more than 30% of the audience is known or reasonably expected to be below LPDA. This percentage can vary from OpCo to Opco (e.g. 71,6% in the US and 75% in the UK).

**User Generated Content (UGC):** content that is created by users themselves. It may include emails, text, audio, video, photo or any other type of media that is submitted by users to blogs, social networks, message boards or other interactive websites under the control of an OpCo.



# HOW TO APPLY THE RESPONSIBLE MARKETING CODE

As one of the world’s leading beer and cider producers, it’s no surprise that we talk to millions of consumers, colleagues, customers, clients and suppliers every day. So it’s important that our marketing and commercial communications not only reflect the passion and respect we bring to our work, but the fact that we take our responsibilities seriously.

The majority of our consumers sensibly enjoy our beers and ciders, but there will always be a minority who misuse them. So our marketing and commercial communications need to be clear about whom our products are for, and how to enjoy them in a responsible way.

The Code goes to the heart of our “self-regulation” commitment. It’s about being legal, decent, honest and truthful in the way we market our brands so that both as a company and as an industry, we can help address social issues such as drinking & driving, underage drinking and problem drinking.

**About The Code:** Importantly, it doesn’t serve to summarise or substitute EU, national, regional or international laws, policies or codes, which must always be upheld.

The Code is our minimum standard and it explains the HEINEKEN approach to self-regulation.

It’s not here to curb your creativity – it’s here to protect us, so compliance with The Code is key.

**How we’ll use it:** The Code will help safeguard our brand reputation and our freedom of expression in all of our consumer-facing branded activities for Heineken® and across all our other Company Owned or Controlled family of Alcohol Brands and certain categories of LNA Brands.

**Where we’ll use it:** The Code covers all marketing and commercial communications. This includes, but is not limited to:

- ▶ Traditional advertising and public relations
- ▶ Packaging and labelling
- ▶ Point of sale (materials, merchandising, sampling, displays)
- ▶ Signage
- ▶ Branding
- ▶ Trade promotions
- ▶ Sponsorships (events, product placements, celebrities, influencers)
- ▶ Digital advertising, mobile advertising and social media
- ▶ Relationship (“precision”) marketing
- ▶ e-Commerce
- ▶ Influencer marketing

Please note that The Code does not apply to non-commercial communication specifically designed to address social issues such as alcohol awareness, underage drinking, and overconsumption. Nor does it apply to communications that were not made or endorsed by HEINEKEN.

**Who’ll use it:** Please share with your teams, agencies and other third parties you work with.



# COMPLIANCE

Compliance with The Code isn't a "nice to do". It's a must do. We all need to ensure we're doing business in accordance with the laws and regulations that govern us, while also being able to bring our brands to life in the HEINEKEN way.

Everyone involved in the marketing and sale of our Brands, is responsible for implementing The Code. In order to ensure effective compliance:

- ▶ All Commerce teams shall follow The Code and its underlying principles in their marketing and commercial communications.
- ▶ All Commerce, Corporate Affairs and Legal teams and others involved in marketing and selling our brands will receive annual training on this Code. This will be achieved via a mandatory e-learning tool to ensure that everyone knows how to use The Code in our marketing and commercial communications.
- ▶ All HEINEKEN's marketing agencies involved in the marketing and sale of our Brands will also comply with The Code and must complete annual training on The Code, which will be complemented by a mandatory e-learning tool.

- ▶ All agreements related to marketing or commercial communication should refer to The Code and a copy of The Code should be attached to such agreements.
- ▶ Legal and Corporate Affairs should be involved as early as possible in any creative discussion about marketing or commercial communication in order to provide guidance.
- ▶ All correspondence regarding complaints received from (non) governmental organizations, consumers or official complaint bodies about a particular commercial communication, activity or event, is properly addressed and stored.
- ▶ All complaints in relation to commercial communication, trade marketing and sales should be registered for audit purposes.
- ▶ When in doubt, about the correct interpretation of The Code, involve Legal and Corporate Affairs.

The Marketing Director is accountable for the training of the agencies they work with and compliance with The Code within the full marketing team. The Sales Director is accountable for the training of the agencies they work with and compliance with The Code with all sales employees in JG 25 and higher. The Global Brand Directors are then responsible for any marketing or sales activities agreed on a regional or global level – for instance a modern retail agreement with a regional supermarket chain or a sponsorship deal for a global event.

Any issues related to sign-off process, additional guidance or potential departures from The Code should first go through Legal and Corporate Affairs and if required should be escalated to global level. Written approval is then needed from the relevant Global Marketing Director or Chief Commercial Officer before any activity gets underway.

Please discuss the importance of The Code and the abovementioned compliance process with your colleagues and with your external agencies, so that we are able to have a common understanding and implement our marketing and communications in a consistent and effective way.





# PRINCIPLE 1: ADULT APPEAL

### Explanation

We’ve been creating memorable Brand experiences for over 150 years. Our Brands have personality and tell great stories, but we need to take care that this engaging content primarily appeals to customers aged over 18 and of Legal Purchase and/or Drinking Age (LPDA). **Our Brands’ marketing and commercial communications shouldn’t primarily appeal to Minors.**

It is imperative to the welfare of our business not to direct our marketing and commercial communications to Minors. If our marketing and commercial communications have stronger appeal to Minors than adults, they are deemed to “primarily appeal to minors”. This means we need to take care to never use objects, imagery, styles, symbols, music, characters (real or fictitious), games, gaming equipment or other items with primary appeal to Minors. Some markets have specific lists of objects, settings and situations that can’t be used and we’ve included an External References at the back of The Code with details on where to find that information.

It’s about making sensible choices not only during the creative and development process, but when deciding on promotions and prizes, as well as activation locations. It also means we encourage our customers not to sell our Alcohol Brands and LNA Brands, which also have an alcoholic variant to Minors. We actively talk to them so they avoid selling our alcoholic beverages to Minors. And it’s about understanding that styles, interests and trends constantly change. What appeals to Minors today, might be different tomorrow, or might be different from one place to the next. We need to be ever mindful of this.

### Do

- ▶ Ensure any character featured in our marketing or commercial communications is and appears to be over 25 years of age except if local legislation or regulations explicitly states otherwise. This also applies to 0.0% and No-Alcohol variants of our alcoholic Brands. Please also make appropriate effort to do the same if in a position to control User Generated Content (i.e. a consumer photo).
- ▶ Ensure that any characters aged between LPDA and 25 may appear in PR, event promotions or sponsored activities but not in our marketing or commercial communications.

- ▶ Take extreme care when including fictional characters or any gaming references in your marketing, communications or promotions, particularly any gaming reference that appeals to Minors.
- ▶ Remember, our Brands are world famous and consumers may want to post content to our owned or paid communications channels. We need to make clear our “house rules” or terms and conditions govern the type of content that’s appropriate, and then actively moderate those channels, where we can control content. Any inappropriate content needs to be removed and the reason for its removal explained to our consumers.
- ▶ Not create marketing or commercial communication that feature:
  - ▶ Animated cartoon characters that are appealing to Minors or are childish in style and design.
  - ▶ Athletes that are below 25 and whose audience is primarily composed of Minors or sports that are primary appealing to Minors.
  - ▶ Influencers that are below 25 and whose audience is primarily composed of Minors or primarily appealing to Minors.

# PRINCIPLE 1: ADULT APPEAL

- ▶ Clothing style, dress sense, behaviour (bullying, teenage peer pressure, childish pranks, teenage romance, etc.) that are primarily appealing to Minors.
- ▶ Schools, playgrounds, child related attractions (e.g. skate parks, teen clubs etc.) or children’s media.
- ▶ Our Brands or logo’s on merchandise or other materials that primarily appeal to Minors such as toys or children games.
- ▶ Video game consoles and related devices or games computer games that are primarily played by Minors.
- ▶ Immediately get in touch with your Legal team if you’re aware of any complaints about our marketing or commercial communications.

### Ask yourself...

If at any point you’re not sure if your work complies with The Code, then try answering these three simple questions. All of your answers should be YES. If you answer NO to any of these questions then unfortunately your content isn’t compliant and you’ll need to make changes.

1. Even though the celebrity in your marketing or commercial communication is over 25 years old, does he/she look older than 25.
2. Is the language in your marketing and communications the sort of language you wouldn’t expect to hear or read from specifically Minors?
3. Is the location of your activation or event somewhere that’s not predominantly visited by Minors (at least in the last three months)?

### Why do we care?

- ▶ Many Minors want to emulate the actions of adults and influencers in their lives. We believe this should never include behaviours related to alcohol consumption.

OBJECTS, IMAGERY, STYLES, SYMBOLS, MUSIC, CHARACTERS (REAL OR FICTITIOUS), GAMES, GAMING EQUIPMENT, OR OTHER ITEMS THAT APPEAL PRIMARILY TO MINORS CANNOT BE FEATURED IN OUR BRANDS’ COMMUNICATIONS, EVENTS OR ACTIVATIONS.

- ▶ We have a long history of encouraging responsible consumption and we take this role seriously. In 2012, HEINEKEN co-authored the Responsible Marketing Pact (RMP) which applies throughout the whole EU. This RMP contains industry commitments to prevent the targeting of Minors by blacklisting a number of creative features known to ‘primarily appeal to minors’. The RMP also contains a number of commitments on the use of social media, which will be addressed in the section “Additional Guidance Principle 2: Digital Media”. In 2018 HEINEKEN also agreed to comply with the RMP Appeal Pillar review which contains a new compliance assessment program to ensure that the RMP commitments are met.



# PRINCIPLE 2: WE ACTIVELY RESTRICT EXPOSURE OF OUR BRANDING TO MINORS

### Explanation

We want to ensure that our marketing and commercial communications reach an age-appropriate audience, which is why we put controls in place to restrict who can see our owned or paid-for branding or branded activity.

We work with the 70/30 Rule. It means our content is featured in places where at least 70% of the total audience is restricted to above the LPDA. When using the 70/30 Rule, ensure that the composition of the audience is regularly reviewed in order to remain compliant.

When it comes to Digital Media channels like YouTube, Facebook and Twitter, we can restrict viewers to above the LPDA or 18+ by using the channel owner’s own functionality. In other channels we rely on third-party audits to get a picture of the audience demographic. And occasionally when the right data is not available, we have to use our own common sense.

We have two methods for restricting content to above the LPDA or 18+:

1. Our preferred method is **Age Affirmation**. This can be achieved in different ways:

(a) By using a screening process requiring consumers to provide their Date Of Birth at the point of registering. It uses the channel’s own functionality (e.g. Facebook) to restrict access for underage users and we think it offers the best user-experience, as restricted content is then never shown.

(b) By pro-actively asking consumers to provide “proof of age” (**Date Of Birth**). It not only works on digital channels like a website, but can also be applied during events by screening visitor IDs. All HEINEKEN’s marketing and commercial communication websites and owned platforms will comply with the abovementioned Age Affirmation requirement.

2. If **Age Affirmation** is not possible, please use **Audience Verification**. If you can prove that 70% of the channel audience is over the LPDA or at least 18+, then you can use the channel. The same applies to promotional materials in outlets, print, outdoor and sponsorships. If less than 70% (71, 6% in the US and 75% in the UK and Ireland) of the audience exposed to our message is above the LPDA, the message should not run.

If you can’t comply with any of the two different-check methods, or are in any doubt, please always consult Legal and Corporate Affairs.

# DIGITAL MEDIA

### Explanation

As the use of Digital Media has become such an integral part of our marketing and commercial communications, we have included additional guidance on compliance of The Code in a digital environment. Not only do all the principles of The Code apply to our digital marketing and commercial communications, but there are also other considerations to take into account such as Privacy laws and intellectual property laws. As a leading brewer we commit to adhere to digital self-regulation initiatives that impact our marketing and commercial communications via Digital Media such as the Responsible Marketing Pact, Digital Guiding Principles and the RMP Appeal Pillar. In order to ensure compliancy of these self-regulation initiatives, we need to take the following points into consideration:

1. All Digital Media used in our marketing and commercial communication should contain an **Age Affirmation** mechanism. If the **Age Affirmation** page also uses a “remember me” option, then we should include an additional notice on the Age Affirmation page asking the user whether it is appropriate to accept this option if the computer is shared with other users below LPDA or 18+.

2. When a Digital Media channel uses **Audience Verification** please ensure that a statement is placed reminding users that the content is intended for LPDA users only.
3. Whenever HEINEKEN’s marketing and communication websites have the functionality that allows for content sharing, we will include a message that it is prohibited to forward the content to anyone under LPDA or 18+. This message shall be visible and accessible through a link on the HEINEKEN’s marketing and communication websites.
4. All HEINEKEN’s marketing and communication websites should include a responsible drinking message.
5. All User Generated Content submitted to HEINEKEN’s marketing and commercial communication websites should be moderated on a regular and frequent basis and if inappropriate, removed within the shortest possible timeframe.
6. When we use or collect personal consumer data for marketing and commercial communication via Digital Media, we will comply with all EU and local privacy laws, including all required technical and operational measures to safeguard the collected personal consumer data.

7. We will always require consumer consent prior to sending any direct marketing or communication and arrange for easy way for consumers to stop our marketing and communications (opt-out). We will point out to consumers where they can find the applicable data privacy policy and encourage them to read it. Besides the consumer consent, there should be a separate privacy notice (and cookie notice if required) on all HEINEKEN’s marketing and commercial communications websites.
8. Where we collect personal consumer data for precision marketing or behavioural advertising, we will obtain consent, inform the consumer how that data will be used prior to any processing of such data and provide them with an easy way to end such practices (opt-out).
9. When using Digital Media for our marketing and commercial communications, we should be transparent as to our identity and not misrepresent their commercial purpose.
10. We should always protect our Brands and intellectual property rights and avoid infringing the intellectual rights of other rights holders.

ALL DIGITAL MEDIA USED IN OUR MARKETING AND COMMERCIAL COMMUNICATION SHOULD CONTAIN AN AGE AFFIRMATION MECHANISM.



# PRINCIPLE 2: WE ACTIVELY RESTRICT EXPOSURE OF OUR BRANDING TO MINORS

## Do

- ▶ Also know and comply with local and regional codes, policies or legal commitments in addition to The Code.
- ▶ Always check if channels or venues have their own policies for restricting Alcohol Content to Minors.
- ▶ Use registered user-base or third-party audited data as the most trusted sources for verifying an audience’s age. Second best alternative is the asking consumers of “proof of their age”.
- ▶ Evaluate audience composition regularly. If a channel fails to meet the threshold of the 70/30 Rule for three consecutive months, please remove or hide all branded content until the threshold of the 70/30 Rule is once again achieved again for three consecutive months.
- ▶ Not sponsor or promote activities or (promotional) events if Minors are reasonably expected to make up more than the threshold of the 70/30 Rule. If in doubt do not sponsor.

## Ask yourself

- If at any point you’re not sure if your work complies with The Code, then try answering these three simple questions. All of your answers should be YES. If you answer NO to any of these questions then unfortunately your content isn’t compliant and you’ll need to make changes.
1. Does your content comply with local laws, regulations and OpCo or regional commitments for restricted access?
  2. Do you feel comfortable that you’ve taken every appropriate action to minimize the chance that a Minor is exposed to your message?
  3. Can you say: “I feel confident I would pass an external, independent audit on the audience composition that my Brand is exposed to”?

## Why do we care?

- ▶ We understand the negative effects that consumption of alcohol has on Minors which is why we actively minimize exposure in certain environments by ensuring that at least 70% of the audience is over the LPDA or 18+.
- ▶ By better targeting our advertising and Brand messages to the audience that buys and consumes our products, we spend our marketing budgets more effectively.



# PRINCIPLE 3: WE ARE ALWAYS LEGAL, ETHICAL AND TRUTHFUL

### Explanation

Our HEINEKEN brand values are all about enjoyment of life; respect for individuals, society and the environment; and having passion for quality. That same ethos should carry through all of our marketing and commercial communications. In respecting individuals, society and the environment, our commercial communications and marketing should be “legal”, “ethical” and “truthful”. That way, we can ensure we’re communicating in the right way, without breaching any laws, regulations or industry codes of conduct or our internal codes and policies.

By “legal” we mean that our marketing or commercial communication should comply with both the letter and the spirit of all applicable codes and laws in the country where the marketing or commercial communication is disseminated. This is not only applicable to advertising and alcohol laws, but also those related to gaming and promotions, privacy and intellectual property rights (including trade mark, copyright and portrait rights). And these laws and regulations will vary by country and region.

In this digital age, we need to pay special attention to compliance with local privacy and security laws and regulations (including GDPR) when collecting personal consumer data. Any marketing or commercial communication that involves storing personal consumer data must have clear data privacy statement (and cookie statements if required) that our consumers are encouraged to read and provide an opt-in (with the option to opt-out in the future). We also need to ensure that this data is accurate, kept with a clear purpose, not stored longer than necessary outlined to customers and have appropriate technical and organizational measures in place to provide adequate protection.

When we talk about “truthful” we mean communicating transparently and never making any false statements about the benefits of our Brands. All branded content should be distributed in a transparent way so we never conceal the identity or origin of the Brand. When we talk about “ethical” we mean that all our marketing or commercial communications must be true to the Code and its principles.

To that end we must ensure that our marketing and commercial communication are prepared with due regard for our social responsibility and based on principles of fairness and good faith. Whenever our employees or agency personnel participate in discussions (including online), they should be conducted in an open way and they should identify themselves as belonging to our company or an affiliated agency. They should never pose as a consumer to make comments supporting our Brands, or to disparage our competitors.



# PRINCIPLE 3: WE ARE ALWAYS LEGAL, ETHICAL AND TRUTHFUL

### Do

- ▶ Always avoid the use of stereotypes and humor related to age, disability, gender, race, nationality, religion or sexual orientation.
- ▶ Always consult Legal when running a competition, regardless how small the prize. Especially if it involves retaining personal data of consumers.
- ▶ Always comply with our internal Brand Promoter Policy. When engaging with Brand Promoters for sponsorship or promotional events we ensure to create a safe working environment. There are no exceptions: no geography, channel or specific form of promotional activity is exempt from our Brand Promoters Policy.
- ▶ Not promote excess consumption in our events and in our promotional activities.
- ▶ Always use Brand controlled accounts when engaging in online conversations on behalf of the Brand.
- ▶ Always have a clear data privacy (and cookie statements if required) that our consumers are encouraged to read and opt-into when storing personal data of consumers.
- ▶ Provide adequate security when storing data and never keep personal consumer data longer then agreed or use it for other purposes then requested.

### Ask yourself

If at any point you're not sure if your work complies with The Code, then try answering these three simple questions. All of your answers should be YES. If you answer NO to any of these questions then unfortunately your content is not compliant and you'll need to make changes.

1. Do we adhere to all local privacy laws, local copyright, intellectual property rights and gaming laws?
2. Would an individual recognize that the marketing or commercial communication or activation is coming from one of our Brands?
3. Would you be happy to in public defend your marketing or commercial communication concept as legal and truthful?

### Why do we care?

- ▶ Moderation and responsible consumption are at the heart of the sustainable growth of our industry. We embed these values in all our marketing and commercial communications.
- ▶ We're a performance-driven company that's passionate about our business and achieving our



**WE ALWAYS RESPECT THE APPLICABLE EU, LOCAL LAWS, REGULATION AND SELF-REGULATORY CODES AND NEVER HIDE OUR BRAND'S IDENTITY OR AUTHORSHIP OF CONTENT. WE ALWAYS TAKE INTO ACCOUNT OUR BRAND VALUES AND CORPORATE RESPONSIBILITY IN ALL OF OUR MARKETING OR COMMERCIAL COMMUNICATION BY RESPECTING, INDIVIDUALS, SOCIETY AND THE ENVIRONMENT.**



goals. We seize opportunities and build on our business on a daily basis with fairness, integrity and respect for the applicable rules, self-regulation and laws.

- ▶ We can only strive for future success if we combine our expertise and passion, with a pledge to take our corporate responsibility and our Brand values seriously.

# PRINCIPLE 4: WE ADVOCATE DRINKING RESPONSIBLY, MODERATION AND GENERAL SAFETY

### Explanation

Here at HEINEKEN, we’re focused on making life more enjoyable. It’s one of our core values, with each of us committed to bringing joy to our consumers through the responsible promotion of our Brands and the sponsorship of events that are important to them. The key is creating positive experiences by encouraging our consumers to enjoy our products in **moderation**.

Our commercial communications and marketing should show that drinking in moderation is cool and aspirational - never by encouraging excessive or irresponsible consumption in any form.

That’s why we never make Alcohol Content and product strength the primary benefit or the main theme of our marketing or commercial communications of our Alcohol Brands. And we never positively associate our Alcohol Brands with drunkenness – it’s not how we want our Alcohol Brands to be enjoyed.

There are situations when alcohol shouldn’t be consumed. For instance drinking and driving don’t mix, with the exception of our No-Alcohol Brands. We actively avoid association between these activities, instead promoting safe transportation options (like taxis). A clear, relevant and pre-approved responsible

drinking or responsible driving message should feature on all our marketing and commercial communications such as packaging or outdoor features, print, and Digital Media, where feasible.

Responsible consumption isn’t just about not drinking and driving, it extends to the operation of potentially dangerous machinery, or consuming alcohol before or during a potentially hazardous activity.

And it’s about having options – so we actively look for opportunities to ensure our No-Alcohol Brands are available as a viable alternative.

### Do

- ▶ Always include a responsible consumption message in all relevant Brand promotions (including packaging and at events and activations), sponsorships, print, and Digital Media.
- ▶ Actively monitor all Company Owned and Controlled Digital Media for content our consumers might post about irresponsible consumption or hazardous behaviour. If we see it, we need to act on it, by removing the content and/or responding to it.
- ▶ Ensure that sampling opportunities are offered in an appropriate way by trained Brand Promoters who are at least 18 years of age or older. For instance, we believe in refusing service to people

who appear intoxicated or are driving, or are below LPDA or at least 18+, even if their parents have consented.

- ▶ Ensure that our Brand Promoters are able to do their work safely at all times. This includes all aspects of their role: working times, places, transport, uniform, incentives, tasks and behaviour. We will not deploy Brand Promoters if we cannot meet the required conditions for their safety.
- ▶ Ensure that our Brand Promoters, marketing and commercial communications do not promote drinking games or mechanisms that enhance irresponsible consumption.
- ▶ Ensure that our marketing and commercial communications do not target or portray pregnant women or suggest that drinking whilst being pregnant is acceptable. This is also applicable for our No-Alcohol Brands.
- ▶ Set aside a percentage of your communications and marketing investment that’s dedicated to the responsible drinking message (e.g. 10% of Heineken® media spend should be directed to the promotion of responsible drinking in any OpCo’s selling Heineken®). Then make sure you comply with it.





# PRINCIPLE 4: WE ADVOCATE DRINKING RESPONSIBLY, MODERATION AND GENERAL SAFETY

## Ask yourself

If at any point you're not sure if your work complies with The Code, then try answering these three simple questions. All of your answers should be YES.

If you answer NO to any of these questions then unfortunately your content is not compliant and you'll need to make changes.

1. Does the branded activity avoid suggesting that the product has a health or sedative benefit?
2. If the marketing or commercial communication concept was real, would everyone featured be safe from harm, both for themselves and others?
3. Would you be happy to see your partner or a family member behave this way?

## Why do we care?

- ▶ Our Brands are enjoyed by hundreds of millions of people around the world. For many adults those Brands are consumed in moderation as part of a healthy, balanced lifestyle.
- ▶ We want consumers to share our belief that moderate, responsible consumption is aspirational and that overconsumption not only may damage the individual, but also the people around them.
- ▶ For some occasions and some people, it's better not to drink at all.

WE NEVER ENCOURAGE CONSUMERS TO DRINK LARGE AMOUNTS, EXCEED THEIR LIMITS OR ENGAGE IN HAZARDOUS BEHAVIOUR. INSTEAD WE ACTIVELY SEEK OPPORTUNITIES TO SHOW AND PROVE THAT DRINKING IN MODERATION IS COOL AND ASPIRATIONAL.

# PRINCIPLE 5: WE DO NOT ASSOCIATE OUR BRANDS WITH ANTI-SOCIAL BEHAVIOUR OR OVERCONSUMPTION

### Explanation

Alcohol can lower people’s inhibitions. Irresponsible consumption can lead to people doing things they would not normally do. Binge drinking and excessive consumption are not acceptable and are deemed dangerous behaviours.

For all of these reasons, our Brands must never encourage or accept these behaviours. Our marketing and commercial communications must not feature violence or aggressive behaviour. Instead our marketing and commercial communication should always show that moderation and abstinence are positive aspects of responsible consumption. And any campaigns, competitions, promotions or samplings should never encourage or challenge our consumers to drink rapidly or consume multiple units in a single session.

### Do

- ▶ Prepare a detailed risk-assessment of any branded activity, identifying how you intend to avoid any association with anti-social behaviour.
- ▶ Be prepared to see Digital Media conversations where people are talking about our brands in ways that other people may consider anti-social. Please take part in regular Digital Media listening and agree a moderation approach to help manage discussions.

- ▶ Ensure that Brand Promoters and agencies are trained on how to recognise and flag anti-social behaviour (especially at events or sampling opportunities).
- ▶ Consider whether content or topics may be considered harmful to others or cause distress.
- ▶ Take extra caution when reviewing sponsorships or point of sale at venues where the activities that occur there could be seen as violent or aggressive.

### Ask yourself

If at any point you’re not sure if your work complies with The Code, then try answering these three simple questions. All of your answers should be YES. If you answer NO to any of these questions then unfortunately your content is not compliant and you’ll need to make changes.

1. Is my activation or sponsorship free from any direct or symbolic links with violent, anti-social or aggressive behaviour?
2. Would you be comfortable defending the branded activity as safe?
3. Would you be happy for your partner or friend to participate in the events or activities that your Brand’s content is suggesting?

OUR BRANDS SHOULD NEVER BE ASSOCIATED WITH ANTI-SOCIAL, VIOLENT OR ILLEGAL BEHAVIOUR. INSTEAD IT SHOULD ALWAYS SHOW THE POSITIVE ASPECTS OF RESPONSIBLE CONSUMPTION.

### Why do we care?

- ▶ Anti-social behaviour is not only bad for our Brands, but bad for society – creating dangerous or unsafe environments for our consumers.
- ▶ Bravado, illegal gambling, aggression and violence are negative behaviours that are directly at odds with the positive story our Brands and products have to tell.

# PRINCIPLE 6: WE NEVER CLAIM THAT CONSUMING OUR BRANDS LEADS TO SOCIAL OR SEXUAL SUCCESS OR ENHANCED PERFORMANCE

### Explanation

At the simplest level, alcoholic drinks are often used to set the tone for an occasion. For instance in many Western cultures champagne is synonymous with celebration, or in China a couple will symbolize their love for each other by linking arms to drink wine on their wedding day. Whilst alcohol does form part of the social life in many cultures and plays a rich and positive role in society, we need to take care in how we represent those social environments and occasions in our marketing and commercial communications.

For instance, we would avoid featuring consumption of our Brands as contributing to or enabling sexual or social success (helping someone gain a promotion, wealth, friends, possessions, popularity) or giving someone better mental or physical capabilities. We also never display nudity in our marketing and commercial communications.

### Do

- ▶ Present our Brands (in any aspirational marketing or communications) as complementing and reflecting good living, social accomplishments or good taste, rather than causing them.

- ▶ Take extreme care when exploring concepts that feature adult relationships or have a theme that could be interpreted as sexual. Our Brands should never be presented as enabling sexual success or performance.
- ▶ Keep the boundaries of good taste in mind.

### Ask yourself

If at any point you're not sure if your work complies with The Code, then try answering these two simple questions. Both of your answers should be YES.

If you answer NO to either of these questions then unfortunately your content is not compliant and you'll need to make changes.

1. Would you feel comfortable watching the commercial communication or promotion with your manager, parents and/or grandparents?
2. In my communication or event, is it clear that alcohol is not the cause of social or performance success?

「

WE NEVER PRESENT OUR BRANDS AS AN ENABLER FOR SEXUAL SUCCESS, A BETTER SOCIAL LIFE OR AS A PHYSICAL OR MENTAL PERFORMANCE ENHANCER.

」

### Why do we care

- ▶ HEINEKEN respects all people, regardless of age, disability, gender, race, nationality, religion and sexual orientation – it is part of our DNA. Our values will stand for nothing if the stories we tell to the outside world don't mirror our internal culture. We believe in selling our Brands for the right reason. We don't want to make our consumers believe that they need to drink our Brands to feel better, or to obtain social and sexual success.
- ▶ Presenting our Brands as an enabler for sexual and social success or as a performance-enhancer is specifically prohibited by EU legislation, local laws in several countries and most regulatory bodies.



# PRINCIPLE 7: WE ARE COMMITTED TO OUR BRANDS BEING PART OF A BALANCED LIFESTYLE

## Explanation

We never make any positive health, therapeutic or dietary claims or performance benefits about Alcohol Content or imply that our Alcohol Brands can prevent, treat or cure medical conditions. We also should not suggest a drink is preferable to another because of Alcohol Content. Even though Alcohol Content can have an impact on taste, a product’s strength should never be presented as the primary benefit, or as the main theme of our marketing or commercial communication, unless it is a No-Alcohol Brand. What we can do is talk about the lower Alcohol Content of an Alcohol Brand compared with similar brands in the category or advocate the benefits of our No-Alcohol Brands.

We also avoid suggesting that a Brand’s relatively low Alcohol Content means that it can be consumed in larger quantities. So although drinking low Alcohol Content beverages can fit into a more responsible drinking pattern, never suggest that doing so is a way to avoid alcohol abuse.

We will never show or suggest the consumption of alcohol by women who are pregnant.

## No-Alcohol Brands (including 0.0% Brands)

The same applies to our No-Alcohol Brand variants that carry the name of our beer or cider brands and which are packaged in a similar fashion. We must clearly display the 0.0% or no-alcohol message or logo to distinguish these products from those containing alcohol.

These No-Alcohol Brand variants may lead with and communicate the benefits of no alcohol but always in a way that positions them as an adult drink – not for anyone under the LPDA or at least 18+. They should also comply with local regulations as well as the other principles in this code, except those principles related to enhancing performance or (functional) benefits of any kind. Specifically for this reason we should look for opportunities to ensure that our No-Alcohol Brands are available as a viable alternative for our Alcoholic Brands.



# LOW & NO ALCOHOL (LNA) BRANDS

## Explanation

LNA Brands encompasses a vast range of brands from low and non-alcoholic beers to malt based soft drinks that have appeal to a younger consumer. Hence, we need to be clear on how to treat and market these LNA Brands. A specific category within LNA Brands are our No-Alcohol Brands.

## LNA Brands and ABV

Some LNA Brands will be treated in the same manner as Alcohol Brands and must be compliant with the **full Code**, while other LNA Brands need to be only partly compliant with the Code (e.g. No-Alcohol or 0.0% Brands). In order to determine which LNA Brands need to be fully or partly compliant with the Code, we need to firstly consider the Alcohol Content (ABV) of the Brand, but in some instances also take into account whether the product is available in the market as a beer and cider product or as a soft drink.

## Compliance Guidance – LNA Brands

For LNA Brands, the ABV and specifics of the Brand determine the applicability of the Code:

1. If the LNA Brand contains an ABV equal or above 0.5%, then irrespective of ABV, the full Code applies to this LNA Brand (e.g. Heineken Light 3.0%).
2. If the LNA Brand is a No-Alcohol Brand marketed under name of a beer or cider product that is available in the market with an ABV above 0,5%, then the Code partly applies to this No-Alcohol Brand or 0.0% Brand (Heineken 0.0%, Cruzcampo Zero). Only the prohibitions to communicate about any enhanced performance (see Principle 6) or functional benefits of any kind (see Principle 7) do not apply.
3. If the LNA Brand is a No-Alcohol Brand not marketed under name of a beer or cider product that is available in the market (e.g. Maltina, Viva Malta, Fayrouz and Solar Power), then the Code does not apply and this No-Alcohol Brand can be marketed in accordance with local regulation and practice governing the Consumer Soft Drink category.

## Placement No-Alcohol Brands (including 0.0% Brands)

The No-Alcohol Brand variants marketed under the name of beer or cider products that are available in the market, should only be sold via channels frequented in majority by adults and should be placed next to the beer and alcohol category, preferably in an alcohol free beer category. Where there is no such category, they should be displayed high shelf and where possible next to adult flavours (like tonic, ginger, bitter lemon etc.).

All other No-Alcohol Brands in our portfolio (e.g. Maltina, Fayrouz, Solar Power, etc.) can be marketed, sold and displayed according to local regulation and practice governing the Consumer Soft Drink category.



# LOW & NO ALCOHOL (LNA) BRANDS

## Do

- ▶ Be open and transparent about the Alcohol Content of our Brands and the amount of alcohol people are consuming. For instance at events don't use and/ or serve our Brands in a way that could confuse or mislead people about the amount of alcohol they're consuming.
- ▶ When listing the Alcohol Content of one of our LNA Brands, always do it in a simple way and not part of a creative idea (e.g. a tagline). The same applies to our 0.0% Brand variants that carry the name of our beer or cider brands and which are packaged in a similar fashion. We must clearly display the 0.0% message or logo to distinguish these products from our Alcohol Brands and never use the related Alcohol Brand logo on our visuals.
- ▶ Ensure that our marketing and commercial communication of 0.0% Brands comply with the 70/30 Rule and contain an Age Affirmation mechanism.

- ▶ Be fact and science based when making any positive health or performance benefits claims for 0.0% Brands and make sure that it is clearly recognizable as alcohol free.
- ▶ Consult Corporate Affairs and Legal, when talking about the Brand's benefits in relation with moderate consumption.

## Ask yourself

If at any point you're not sure if your work complies with The Code, then try answering these two simple questions. All of your answers should be YES.

If you answer NO to any of these questions then unfortunately your content is not compliant and you'll need to make changes.

1. Is my marketing or commercial communication for Alcohol Brands free of any suggestion that the product has a health or sedative benefit?
2. Is it clear that Alcohol Content isn't used as the primary benefit of the Brand, or as the main theme of the communication?

THE ALCOHOL CONTENT (ABV) OF OUR PRODUCTS IS NEVER PRESENTED AS THE PRIMARY BENEFIT OF THE BRAND OR AS THE MAIN THEME OF THE COMMUNICATION, UNLESS IT IS A NO-ALCOHOL BRAND.

## Why do we care?

- ▶ We're a market leader in beer and cider and we want to act like a leader. It's incredibly important to us. We don't want people to drink more... we want them to drink responsibly.
- ▶ Responsible drinking doesn't mix with: encouraging consumers to drink more because of low Alcohol Content, or emphasizing high alcohol content as a product benefit.



# PRINCIPLE 8: WE ARE PROGRESSIVE ABOUT CULTURAL CONTEXT AND ITS EVOLUTION

## Explanation

We are a global company, under scrutiny everywhere for our behaviour and the standards we set in every market we operate. The world changes in the blink of an eye, and we have to be nimble and progressive so that we remain culturally relevant and respectful. For this we need to regularly review our activities and communications against both cultural trends and our business attitudes towards what is acceptable.

Our branded activities are often associated with events, places and moments of cultural relevance too, such as our sponsorships and music events. The things we choose to be associated with say something about us; like our values and what we believe in, so we're extremely careful about what we sponsor, avoiding anything that could be considered dangerous or violent.

For our international Brands, we need to take a global perspective, ensuring what we're trying to say is relevant and understood in the context that we intended.

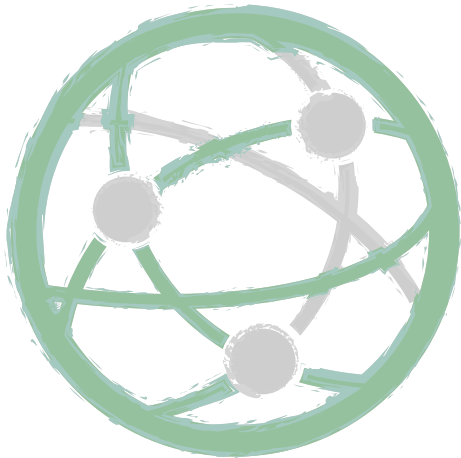
We're respectful of:

- ▶ Gender and diversity, and are sensitive to the cultural context of these. We portray the characters and individuals that appear in our commercial communication positively, with respect and with decency. We do so regardless of their gender, race, religion or age and avoid the use of stereotypes.
- ▶ The environment and seek opportunities to include our Brewing a Better World programme in our branded activities. In accordance with our sustainability performance we are committed to responsible consumption we should use the power of our marketing and commercial communication to make moderation cool.
- ▶ Animals and animal welfare, and we actively role-model positive stories about the human- animal bond.

We regularly monitor consumer conversations on Digital Media about our Brands, knowing when to respond, ignore or remove conversations based on a pre-agreed framework with Legal and Corporate Affairs.

## Do

- ▶ Align with the Brewing a Better World sustainability programme (e.g. directing 10% of Heineken® media spend to the promotion of responsible drinking across all those operating companies selling Heineken® or providing ingredients and nutritional information on pack or online for our Brands).
- ▶ Listen to global and local cultural trends (e.g. diversity, animal welfare) that could create negative associations for our Brands.
- ▶ Agree on a process for monitoring Digital Media conversations, before launching any branded activity, so that you know when to ignore, respond or remove comments by consumers.
- ▶ Establish Service Level Agreements (SLAs) with external agencies/partners that manage Digital Media listening. Please agree on minimum levels of listening, reporting cycles and the time required to activate any changes (e.g. if you need to manage a crisis scenario).
- ▶ Ensure you have Q&A's prepared in advance for any communication or activations for both positive and negative responses from the public or special interest groups.



# PRINCIPLE 8: WE ARE PROGRESSIVE ABOUT CULTURAL CONTEXT AND ITS EVOLUTION

### Ask yourself...

If at any point you're not sure your work complies with The Code, then try answering these two simple questions. All of your answers should be YES. If you answer NO to any of these questions then unfortunately your content is not compliant and you'll need to make changes.

- 1. Does the branded activity show respect for the environment, animals and people?
- 2. Are our actions consistent with long-term sustainability and welfare as championed by our Brewing a Better World agenda?

### Why do we care?

- From the very beginning, HEINEKEN has been driven by a desire to create a successful and sustainable business that, more than just achieving financial success, makes a positive contribution to society.
- The use of animals in advertising poses challenges from a Brand as well as reputational point of view. This means that we need to be more alert and sensitive to the role of animals in our branded activity. Restrict where possible the use of animals in our marketing or commercial communications.
- We've exercised extreme caution when associating ourselves with dangerous sports (including horse-racing, boxing, ultimate fighting and motorsport) and seek to ensure that we include responsible consumption messages prominently.
- In accordance with our Brewing a Better World programme we remain committed to responsible consumption by using the power of our Brands to make moderation cool in order to avoid irresponsible consumption.

WE ARE RESPECTFUL OF GENDER AND DIVERSITY AND ARE SENSITIVE TO THE CULTURAL CONTEXT OF THESE. WE PORTRAY THE CHARACTERS AND INDIVIDUALS THAT APPEAR IN OUR COMMERCIAL COMMUNICATIONS POSITIVELY, WITH RESPECT AND WITH DECENCY. WE DO SO REGARDLESS OF THEIR GENDER, RACE, RELIGION OR AGE AND AVOID THE USE OF STEREOTYPES.

# EXTERNAL REFERENCES

**Beer Institute Advertising and Marketing Code, 2015:** The advertising and marketing code of the national trade association of US Beer industry (“The Beer Institute”) that contain guidelines for all beer branded advertising and marketing materials created by or under control of a brewer in the US.

**Brand Promoters Policy:** The Heineken policy that is applicable when engaging Brand Promoters to promote Company owned or Controlled Brands at the point of sale. Brand Promoters can be employed directly by HEINEKEN or through an agency or distributor on our behalf.

**Brewers of Europe Advertising Guidelines, 2003:** The self-regulatory advertising guidelines of the brewers associations of the EU member states (“Brewers of Europe”) with respect to the advertising, sponsorship and promotions of beers.

**Code of Practice, Portman Group (UK):** The Portman Group is the responsibility body of UK drinks producers (including HEINEKEN) that regulates the promotion and packaging of alcoholic drinks in the UK through its UK Code of Practice. Its members are ABI, Bacardi, Brown-Forman, Carlsberg, Diageo, Pernod-Ricard, Molson Coors, Jägermeister and HEINEKEN.

**Digital Guiding Principles (“DGP’s”), 2015:** All Digital Commitments signed by Beer, Wine and Spirits companies pledge to develop a set of global guiding principles for alcohol beverage marketing in digital media.

**DGP’s Implementation Guide, 2017:** The DGP Implementation Guide provides detailed guidelines how to implement the DGP’s in the following social media sites (Facebook, Instagram, Twitter, YouTube) and for brand owned websites and Apps.

**HEINEKEN Policy on the use of social media:** The HEINEKEN Policy that explains how our employees are expected to use social media on a personal level as well as for Company purposes.

**ICAP Guiding Principles, 2011:** The International Center for Alcohol Policies (ICAP) has developed guiding principles for the self-regulation of marketing communications for alcoholic beverages. Its members are ABI, Asahi, Bacardi, Beam Inc., Brown-Forman, Diageo, Molson Coors, Pernod Ricard, UB Group and HEINEKEN.

**ICC Framework for Responsible Marketing Communications of Alcohol, 2011:** This Code from the International Chamber of Commerce (ICC) sets forth general principles governing all marketing activities related to the sale and promotion of alcoholic beverages.

## Label Rules and Guidelines:

1. The **quality assurance standard Labelling Requirements** describing the mandatory labelling requirements of HEINEKEN company beers (including beers <1.2% ABV), based on EU legislation.
2. The **quality assurance standard Ingredient Designation** providing guidance on ingredient designation and clarifying how an ingredient,

additive, flavouring or processing aid should be labelled in case it is labelled.

3. The **Beer Labelling Directive Outside the EU** clarifying HEINEKEN’s beer brand labelling directive for markets Outside the EU.

**Local laws;** local applicable laws and regulations.

**National and regional self-regulation codes:** national and regional self-regulation codes that regulation the promotion or packaging of alcoholic drinks (e.g. UK Portman Code of Practice or US Beer Institute Code).

**Responsible Marketing Pact, 2014:** The Responsible Marketing Pact is a commitment of global alcohol producers to implement new standards on responsible marketing within the EU. The Pact has a focus on preventing communication that ‘primarily appeals to minors (blacklist) and also contains commitments on the use of “social media” channels. The RMP members have committed to publicly report on the implementation of the RMP and annual monitoring exercises will be run on the basis of annual compliance reports. Its members are ABI, Bacardi, Brown-Forman, Carlsberg, Diageo, Pernod-Ricard, and HEINEKEN.

**RMP Appeal Pillar Review, 2018:** The RMP Appeal Pillar Review finalizes the blacklisted activities that appeal primarily to minors and contains a compliance assessment program. An appointed Self-Regulatory Organization (SRO) will evaluate the RMP commitments and issue a report. The RMP members have committed to undertake corrective actions within two months if they are not compliant.