



**Budweiser Brewing Company APAC Limited**

**百威亞太控股有限公司**

*(A company incorporated in the Cayman Islands with limited liability)*

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**Responsible Marketing and Communications Code**

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## Preface

At Budweiser Brewing Company APAC Limited and its affiliates (“BUD APAC” or the “Company”), we brew our beers to be enjoyed responsibly by individuals of legal drinking age. We take great pride in our brands. We care about the natural resources and ingredients that contribute to making our beers the most enjoyable they can be for our consumers.

With a purpose that we dream big to create a future with more cheers, 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 Responsible Marketing and Communications Code (RMCC) 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, we have a great responsibility to ensure that our communications are honest and truthful, keep with contemporary standards of good taste, and are sensitive to cultural differences between markets. Compliance with the Code is therefore mandatory for all of our marketing, sales, promotion and communications efforts and includes both traditional and digital media.

Putting our RMCC into practice every day is part of our company's strong tradition of corporate responsibility that dates back over 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.

## **INTRODUCTION**

At BUD APAC, we recognize that responsible drinking is fundamental to achieving our purpose of bringing people together for a better world. As a responsible brewer, 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 BUD APAC'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, along with the other values endorsed by our Code of Conduct, including our Human Rights Policy and Anti-Harassment and Anti-Discrimination Policy; together these policies shall be regarded as the minimum standard to be applied throughout the Company.

## **SCOPE OF THE CODE**

The RMCC applies to all forms of brand marketing and commercial communication for all BUD APAC products that contain alcohol, use an alcohol trading name, or are an alcohol-free or non-alcohol beer product.

This includes, but is not limited to:

- traditional advertising (including TV, radio, print, out-of-home, cinema);
- direct and relationship marketing, including text messaging and email;
- digital media, including websites and social media;
- branding, packaging and labeling;
- brand promotions;
- consumer, trade and brand public relations activities;
- experiential marketing programs such as music events, sporting events, culinary events, etc. and promotional activities;
- product placement;
- sponsorships including through sports, groups, events, product placement, celebrities or influencers;

- category marketing; and,
- point-of-connection materials.

The Code does not apply to:

- communication devoted to supporting responsible drinking or efforts designed to prevent irresponsible consumption of alcohol;
- corporate communication and press releases, and statements to the media or government;
- the use of BUD APAC products without the express permission of the company;
- communications in which BUD APAC was neither involved in the creation, nor in the distribution of the content, and did not officially endorse the content; and,
- educational and social awareness campaigns, and promotion of cultural and tourism activities such as brewery visitor attractions that focus on factual information and the history or technical process of brewing.

Although this Code does not apply to corporate communication (e.g., employee engagement, recruitment communication, etc.) and transactional sales activities (e.g. e-commerce, third party marketplaces), its principles regarding responsible marketing should inform how we interpret and apply other corporate policies (e.g. Code of Business Conduct, Employee Smart Drinking Code, Corporate Event Code, Consumer Information Policy).

Compliance with the RMCC is mandatory for all our operations and sets the minimum standards for BUD APAC's marketing and commercial communication worldwide. Some countries have more stringent standards, and where they do we will meet them too. Thus, where national laws, regulations or self-regulatory codes apply to our commercial communications, these must be followed in addition to the criteria set out in the RMCC.

Although each BUD APAC employee must comply with this RMCC and national laws, regulations, and self-regulatory codes regarding marketing and communication, the ultimate responsibility for such compliance lies with the Zone Marketing and Sales Vice Presidents (VPs).

## **CODE REQUIREMENTS**

### **1. Basic Principles**

1.1. Brand marketing and commercial communication must:

- be ethical, legal, honest and truthful;
- be prepared with a core sense of social responsibility and be based on principles of fairness and good faith;
- be consistent with our company values and reflect generally accepted contemporary standards of good taste and decency;
- avoid representation of our consumers, customers, employees and partners in a manner that is idealistic or objectified;
- not include harmful, offensive, or derogatory stereotypes that are inconsistent with the values set forth in our Diversity & Inclusion Policy;
- be sensitive to cultural differences between markets; and,
- be clearly distinguishable in its commercial nature.

1.2. In applying these requirements, creative elements are to be considered from the viewpoint of a reasonable adult of legal drinking age, and in the overall context of the commercial communication.

1.3. To the extent applicable, commercial communication will be governed by the local law for the market in which the materials are to be used. When creating communication materials, we will, at our discretion, always consider the application of the most stringent standards.

1.4. We may, at our discretion, decide not to release any piece of commercial communication, postpone its release, and/or recall communication materials for any relevant reason, including but not limited to non-compliance with this Code, changes in local culture or practice, or a change in our Company's or brands' circumstances.

### **2. Preventing Underage Appeal**

General

2.1. For the purpose of this Code, the term "legal drinking age" refers to the age by which individuals may lawfully drink or purchase alcohol beverages, whichever is greater. Except for those countries that have no minimum legal drinking age, or where it falls below the age of 18, it is BUD APAC's policy not to direct commercial communication to individuals below the

age of 18.

2.2. Our commercial communication will not be directed to those under the legal drinking age.

#### Appeal

2.3. We will not employ any symbol, image, object, cartoon character, celebrity, music, language or other content that is of primary appeal to those under the legal drinking age. For purposes of this Code, “primary appeal” to underage people means special attractiveness beyond the general attractiveness to people of legal drinking age.

2.4. 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.

#### People Featured

2.5. We strive to represent our target consumers accurately, reflecting the diverse nature of the populations in the markets where we operate.

2.5.1. Compensated actors or models in commercial communication must be, and must reasonably appear to be, at least 25 years old.

2.5.2. In a controlled environment, where an age affirmation mechanism is used to ensure the user/viewer is over the legal drinking age, all compensated people featured in commercial communication may be younger than 25 years but they must be, and must reasonably appear to be, of legal drinking age.

2.5.3. Brand Promoters must be, and must reasonably appear to be, at least 21 years old. See clauses 12.12 to 12.15 for additional rules around brand promoters.

2.5.4. Non-compensated people in commercial communications must be of legal drinking age.

2.5.5. All people featured in user-generated content must be, and must reasonably appear to be, of legal drinking age. If such content is re-used by us or on our behalf, then clauses 2.5.1 to 2.5.4 above will apply.

#### Audience

2.6. Our commercial communication will only be placed in print, radio, television or on any form of digital media where at least 70% of the audience is reasonably expected to be of legal drinking age.

2.7. A placement will be considered compliant if the audience composition data that was reviewed prior to the placement satisfied the 70% audience and other placement criteria.

2.8. Our media partners will provide – where available – post-placement monitoring reports on audience composition at half-yearly intervals to verify compliance, to the highest practical level.

2.9. We will not sponsor or direct our commercial communication at events where less than a majority of the audience is reasonably expected to be over the legal drinking age. This requirement does not prevent the company from having communication materials at locations that are used primarily for adult-oriented events, but which occasionally may be used for an event where many attendees are under the legal drinking age.

2.10. For paid outdoor media campaigns, we will take all reasonable steps to ensure that our commercial communication is not placed in close proximity to elementary or secondary schools, places of worship or public playgrounds.

#### Age Affirmation

2.11. All websites and platforms owned or managed by BUD APAC will include an age affirmation mechanism (e.g. age gating, subscription, single sign-in with social media profile, etc.) that wherever possible relies on exact, full date of birth and country information to ensure that only visitors who state that they are of legal drinking age can access the site. If an age affirmation is not available for managed websites, then clause 2.9 above applies and our commercial communication is limited to non-direct communication and must present a responsibility message such as “For people of legal drinking age only.”

2.12. Shareable content should include a clear reminder or forward advice notice stating that recipients should also be of legal drinking age.

### **3. Responsible Drinking**

3.1. Our commercial communication will not portray persons lacking or having diminished control over their behavior, movement, vision or speech or in any way suggest that intoxication is acceptable.

3.2. We will not present refusal, abstinence or moderate alcohol consumption in a negative light; we will always respect an individual’s choice whether or not to drink.

3.3. Our commercial communication will not depict or include pregnant women or imply that the consumption of alcohol during pregnancy is acceptable.

3.4. The brand names and corresponding packaging, labels, internet and social media domain names for our products will not convey sexual innuendo or use terms typically associated with intoxication or irresponsible alcohol consumption.

### **4. Hazardous Activities, Performance and Success**



4.1. Our commercial communication will not suggest physical prowess, power or strength as a result of consuming alcohol beverages.

4.2. Our commercial communication will not depict or suggest alcohol consumption before or during activities, or in locations, that are potentially hazardous or require a high degree of alertness, judgment, precision or coordination for safety reasons (e.g. driving, operating machinery, athletic activities).

4.3. Success in athletic events or other activities will not be portrayed as depending on the consumption of alcohol. It is, however, acceptable to show a participant enjoying one of our brands in a relaxing, celebratory or team setting after the activity has taken place.

4.4. Our commercial communication will not make any claim or representation that alcohol consumption is necessary to achieve social acceptance or professional, financial, academic, sporting or social success.

4.5. Our commercial communication will not suggest that alcohol can enhance sexual capabilities, attractiveness or contribute to sexual success or seduction.

4.6. Commercial communication must not portray nudity and people featured in commercial communication will not be posed in a position or stance that is overtly sexual in nature.

## **5. Violence and Anti-Social Behavior**

5.1. Our commercial communication will not depict violent or antisocial behavior, unless it is clearly recognizable throughout as humor, parody, satire or spoof.

5.2. Our commercial communication will avoid any association with, acceptance of, or allusion to drug culture or illicit drugs.

5.3. Our commercial communication shall be consistent with the values set forth in our Diversity and Inclusion Policy and role model inclusive behaviors towards all groups and voices.

## **6. Prohibited Associations**

6.1. Our commercial communication will not be used in relation to any illegal activity, impliedly or explicitly.

6.2. Our commercial communication will strive not to portray or encourage the consumption of tobacco. We will strive not to encourage the consumption of any tobacco products through sponsorship of tobacco-related events or promotional/sales-enhancing activities.

6.3. Local regulations/sensitivities must be considered before associating our brands with gambling. Where appropriate, our brands should not be associated with gambling.

## **7. Health Aspects**

7.1. Our commercial communication will not claim that alcohol beverages should be consumed for potential net health benefits or to prevent, treat or cure medical conditions.

7.2. Our commercial communication may include factual nutritional information such as calorie or carbohydrate content so long as it is not linked to any claims about health benefits.

7.3. Other evidence-based nutritional information could be permissible provided it has been approved by the Corporate Affairs, Legal, and Supply teams at the Headquarter and BU level.

## **8. Alcohol Content**

8.1. We will clearly state the alcohol content of our products within the variances allowed by law and will seek to avoid consumer confusion about the alcohol content of our products.

8.2. We will not promote a product's higher alcohol content in our marketing as a reason to consume the product, but may permissibly highlight a product's lower alcohol content in our marketing as a tool consumers can use to help reduce their alcohol intake and avoid irresponsible drinking.

## **9. Responsibility Messaging**

9.1. We will include the responsibility messages required by law in the countries where we sell products, and even though none may be legally required, we will include a responsibility message in our commercial communications, where applicable.

9.2. A responsibility message will include one of the following statements or an associated icon, or its substantial equivalent as determined by local management:

9.2.1. Don't drink and drive;

9.2.2. For people over the age of (legal drinking age) only;

9.2.3. Pregnant women should not drink alcohol; and,

9.2.4. Enjoy Responsibly.

9.3. We will strive to include a responsibility message or icon in all of our commercial communications, including downloadable and shareable assets (for example, videos, photos, applications or user-generated content reused by us or on our behalf), except on permanent point-of-sale items (e.g. glassware, neon signs, tables, chairs, coolers etc.), consumer novelty items (e.g. pens or t-shirts), and on communications where the size of the unit makes the responsibility message illegible (for example, in digital advertising where the image is equal to or smaller than 80 pixels in both dimensions).

9.4. All websites and platforms owned or managed by BUD APAC should show a link to TapIntoYourBeer.com or to an appropriate local responsible drinking website (e.g., DrinkAware.co.uk).

9.5. The inclusion of a responsibility message or icon from 9.2 and a reference to TapIntoYourBeer.com or an appropriate local responsible drinking website is mandatory on all new primary or secondary packaging.

## **10. Direct Communication and Privacy**

10.1. Any type of direct communications to consumers, such as letters, loyalty schemes, gifts, emails, texts and other instant messaging, digital applications and other relationship marketing will be permission-based. We shall seek specific consumer consent, including exact date of birth and country (for BU or HQ communications) affirmation, prior to delivering any direct communication to consumers, excluding the communication to obtain consumer permission itself.

10.2. Every time a project, campaign, or website requires the processing of personal data (i.e. any information relating to an identified or identifiable natural person), the colleague responsible for the project, campaign or website shall make sure the Ethics & Compliance team conducts a Privacy Impact Assessment (PIA) and shall implement any remediation plan for action required by the Ethics and Compliance team, and/or the applicable Data Privacy Policy.

10.3. We will process consumers' data based on consent or otherwise legally allowed. In any circumstance, we will inform them of our purposes for using their personal data (e.g. direct marketing, product development) as well as their rights as data subjects.

10.4. Subject to applicable laws and Data Privacy Policy, we will provide consumers with (i) a clear and transparent mechanism to opt out of receiving direct communications and data processing, and (ii) a clear and transparent mechanism to contact BUD APAC in order to exercise their rights as data subjects, in accordance with local law and the Data Privacy Policy.

10.5. We do not direct our commercial communications to people who are under the legal drinking age, and we will take all reasonable efforts to avoid sending direct communications to them.

10.6. We will respect our consumers' interest in the commercial use of their personal information, and we will follow all applicable laws concerning the use of consumers' data for marketing.

10.7. We will provide consumers clear data privacy statements on all brand and corporate websites and platforms that collect or use consumer data.

10.8. We will provide reasonable security for personal data collected in compliance with all applicable laws and regulations.

10.9. If we, or third parties working on our behalf, collect “clickstream” data for the purposes of behavioral advertising to people who visit our websites, we will inform the visitors to our websites of this fact and give them the opportunity to opt out of such practices.

10.10. We will require third parties providing online behavioral advertising (OBA) on behalf of BUD APAC to comply with existing self-regulatory programs offering transparency and control for consumers – such as [www.edaa.eu](http://www.edaa.eu) in Europe, [www.youradchoices.ca](http://www.youradchoices.ca) in Canada, [www.youronlinechoices.com.au](http://www.youronlinechoices.com.au) in Australia and [www.aboutads.info](http://www.aboutads.info) in the United States.

10.11. If there are any questions about this Section, consult the applicable Data Privacy Policy and/or the Compliance Team through the Compliance Channel (Refer to the link provided on the Company Intranet site)

## **11. Digital Media**

11.1. We apply the same minimum standards to all of our commercial communication, including those on digital media. Digital media is a key channel for our communications, which includes but is not limited to:

- websites under BUD APAC’s control;
- paid search;
- display advertising (moving and non-moving);
- interactive television (‘red button’);
- e-mail;
- SMS and MMS messages on mobile devices;
- written or endorsed product reviews;
- in-game advertising;
- user-generated content under BUD APAC’s control;
- viral advertising under BUD APAC’s control;
- social media brand pages or channels, including but not limited to Facebook, Instagram, Twitter, YouTube, etc.;

- downloadable applications (apps); and,

- video games.

11.2. Wherever possible, we will consider using additional age affirmation controls that include:

- appropriate methods to support search engine and content control solutions; and,

- re-direction to an appropriate responsible drinking website for visitors under the legal drinking age.

11.3. In countries where technology is available to verify consumer data against government databases, we will consider implementing such technology, keeping in mind its impact on the user experience.

11.4. User-generated content that is placed on sites or platforms that are controlled by BUD APAC will be moderated on a regular and frequent basis, and we will strive to remove any inappropriate content as soon as reasonably possible, but anyway not later than 24 hours from when it is posted. Sites or platforms that are controlled by BUD APAC will include guidelines on user-generated content stating what type of content users should and should not display on the BUD APAC-controlled site or platform.

11.5. This Code does not apply to user-generated content that is placed on websites or platforms over which BUD APAC has no control.

11.6. User-generated content that is subsequently used in BUD APAC's commercial communication should have the permission of the original user or owner of the content, and/or such use should comply with all policies of the relevant social media platform and this Code.

11.7. All brands need to be compliant with the Digital Guiding Principles aligned with the International Alliance of Responsible Drinking.

## **12. Product Placement, Brand Sponsorship and Promotions**

### General

12.1. This Code applies to overall placement, sponsorship or promotion agreements, including any material carrying company or brand logos, for the duration of the agreement.

12.2. The relevant approval process should be consulted in order to review and authorize the nature and elements of the placement, sponsorship or promotion proposal.

12.3. None of our placements, sponsorship agreements, brand promotions, displays or events will be directed to those under the legal drinking age.

12.4. Any associated materials, merchandise, displays or sponsorship items will comply with all other relevant provisions of this Code and will not be of primary appeal to persons under the legal drinking age, e.g., children's toys.

#### Product Placement

12.5. For product placements where we have final cut creative control, 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 in scenes where:

- a character under the legal drinking age is depicted purchasing or drinking alcohol illegally;
- a character associates our products with drunkenness, drink driving, alcoholism or other abuses or illegal use of alcohol; or,
- a character's drinking is not, in our judgment, appropriate, legal or responsible.

12.6. We will make every effort to ensure that product placements support our beliefs about responsible alcohol consumption and our smart drinking goals.

12.7. Sponsored persons or brand spokespersons, such as celebrities, athletes and singers, must be and reasonably appear to be of legal drinking age.

12.8. A minimum of 70% of the sponsored person's or brand spokesperson's fan base shall be reasonably expected to be of legal drinking age.

#### Sponsorship

12.9. Brand sponsorship means a commercial agreement by which BUD APAC contractually provides financing or other support in order to establish an association between the Company's brands and a sponsorship property (e.g. sport, music, community event) for the granting of certain agreed direct or indirect rights or benefits.

12.10. Our alcohol brands will not engage in sponsorship agreements unless at least a majority of the audience for the event (meaning those primarily attending the event), or fan base for the person, team or entity are reasonably expected to be of legal drinking age.

12.11. General sport or musician sponsorships featuring brand logos are acceptable as long as there is no claim or representation that individuals cannot obtain social, professional, educational, athletic, musical, or financial success or status without consuming alcohol.

#### Brand Promoters and Brand Ambassadors

12.12. Brand Promoters and Brand Ambassadors are individuals who are not celebrities,

personalities or social media influencers and who are compensated in return for informing customers and consumers about our brands or providing samples, serving or selling our products at bars, clubs, restaurants or other on- or off-trade events (hereafter referred to as Brand Promoters). Brand Promoters may be directly employed by the Company or indirectly through third-party providers.

12.13. All brand promotion events representing our products should provide a safe and inclusive environment, and one in which both Brand Promoters and our consumers are treated with dignity and respect. Brand Promoters engaged by BUD APAC must be provided information by their employer on how to access all relevant BUD APAC policies, including BUD APAC's Code of Conduct, RMCC, Anti-Harassment and Anti-Discrimination Policy, and Human Rights Policy. Any Brand Promoters engaged indirectly through a third-party provider shall be engaged in accordance with the Responsible Sourcing Policy and be provided with information around BUD APAC policies and procedures in accordance with that Policy. Further, Brand Promoters must be provided training by their employer on the above policies to enable them to perform their work and understand the resources available to them.

12.14. Any vendor offering to provide Brand Promoters for any BUD APAC promotional event or activity (Promotion or Brand Event) must commit to the above principles and any further contractual requirements deemed appropriate by BUD APAC and be certified by BUD APAC as an approved vendor, before they can permissibly perform services for BUD APAC. Consistent with our culture of ownership, the certification shall be done by the person responsible for the hiring decision of the vendor and evidence of such certification shall be maintained by the BUD APAC company responsible for the engagement.

12.15. BUD APAC staff is required to report to the Ethics and Compliance department any suspicious activity or indicia of non-compliance with this policy regardless of whether a Brand Promoter was engaged directly or indirectly by BUD APAC.

#### Promotions and Brand Events

12.16. To the extent under BUD APAC's control, alcohol must not be supplied to visibly intoxicated persons or those under the legal drinking age.

12.17. Event attendees should not be discouraged from choosing to drink non-alcohol beverages rather than beverages that contain alcohol, and those who do choose to drink alcohol will be encouraged to do so responsibly.

12.18. No pressure will be placed on people to participate in our promotional activities.

12.19. All of our promotions and promotional material will follow cultural standards of good taste and not encourage irresponsible consumption of alcohol either through volume, time span or in any other way.

12.20. Games that require drinking alcohol as an element of the game are not allowed.

12.21. The consumer should always have control over the delivery of the alcohol consumed, and our promotion activities shall not use devices or gimmicks that remove that control from the consumer.

12.22. Wherever possible non-alcohol beer, water and/or soft drinks must be available during the promotion.

12.23. Servers and sellers at promotional events, including Brand Promoters, will be trained on responsible serving and selling of alcohol as well as local legal requirements, preferably with a certified program, if available. Brand Promoters are not permitted to consume alcohol while promoting BUD APAC products directly to consumers.

12.24. To support our belief in responsible alcohol consumption, we will limit open bar sponsorships to reputable events where attendance is strictly limited to people of legal drinking age, or where all servers have been certified as trained on responsible serving of alcohol.

12.25. BUD APAC staff in charge of BUD APAC-sponsored promotional events will be encouraged to promote the use of a designated driver or alternative transport means for participants to return home safely. This could be through cooperation with local transportation companies or local authorities to guarantee easy access to safe transport.

12.26. BUD APAC staff in charge of such events be required to report to the Ethics and Compliance department any suspicious activity or indicia of non-compliance with any applicable laws governing the event – including with respect to the proper and lawful procurement of all licenses, permits and/or approvals necessary to execute the event. BUD APAC staff shall also ensure that any third parties engaged to assist in the procurement of any such licenses, permits or approvals have been approved by the Ethics and Compliance Department in accordance with the Company Anti-Corruption Policy. 13.3.1. We may make reasonably substantiated health or functional benefit claims for alcohol-free beer products, so long as the product is clearly recognizable as alcohol-free;

### **13. Alcohol-Free and Non-Alcohol Beer Products**

13.1. For the purpose of this Code, alcohol-free beer products are defined as all BUD APAC beer products with an ABV of 0.0% (e.g., Brahma 0.0%; Hoegaarden 0.0%). Non-alcohol beer products are defined as all BUD APAC beer products with an ABV of 0.0% to 0.5% (e.g. Budweiser Prohibition Brew; Beck's Non-Alcoholic, O'Doul's Non-Alcoholic Brew). Local legal definitions may also apply.

13.2. We will only promote alcohol-free and non-alcohol beer to adults who could legally drink beverage alcohol, and we will not promote such products for consumption by underage



people.

13.3. We will adhere to all requirements of this Code in all forms of commercial communication about alcohol-free and non-alcohol beer products, with the following exceptions:

13.3.1. We may make reasonably substantiated health or functional benefit claims for alcohol-free beer products, so long as the product is clearly recognizable as alcohol-free;

13.3.2. We may promote drinking alcohol-free and non-alcohol beer as a way to avoid drinking during an occasion, such as at an event when the consumer is a designated driver or at a business lunch; and,

13.3.3. We may promote drinking alcohol-free and non-alcohol beers as a means of practicing pacing to avoid overconsumption during a drinking occasion by reducing the number of alcohol beverages consumed.

13.3.4. We may promote alcohol-free consumed by a car driver, provided that the communication clearly states that the consumption of alcoholic beers is not condoned in such circumstances.

13.3.5. We may promote consumption of alcohol-free for events associated with potential risks, such as motorsport events or rally, provided that the communication clearly states that the consumption of alcoholic beers is not condoned in such circumstances.

13.4. Product placement requests for BUD APAC alcohol-free and non-alcohol beer products will only be granted if the product is clearly recognizable as an alcohol-free or non-alcohol beer product and any character associated with the product is over the legal drinking age.

## **COMPLIANCE REQUIREMENTS**

### **14. Code Implementation, Reporting and Education**

14.1. Written contracts and project briefs with all suppliers involved in the development or dissemination of commercial communications will include a clause that requires compliance with the RMCC and other applicable local codes at all times. A copy of the RMCC and other applicable local codes will be attached to all such contracts.

14.2. **The Sales and Marketing leadership in all zones are responsible** for making sure that the Commitments in this Code are honored by all colleagues, vendors and across all of our brands.

Approvals and Governance

14.3. Marketing and Sales Directors shall be accountable for compliance with this Code. All

commercial communication will be reviewed for compliance with this Code through a standard review and approval process that includes Marketing, Legal, and Corporate Affairs. In instances where a disagreement arises regarding compliance, the issue will be escalated appropriately.

#### Complaints

14.4. The Company encourages **anyone** who has concerns about adherence to this Code to report these concerns to the Company via our Compliance Helpline. The 24-hour Helpline is available at [www.budweiserapac.com/caseReport](http://www.budweiserapac.com/caseReport) with local numbers available in all jurisdictions (for China, call 400 120 4048) . It is secure, toll-free, **confidential**, and reports can be made **anonymously**.

#### Education

14.5. All BUD APAC Marketing, Sales, Corporate Affairs and Legal teams, and external agencies shall receive annual training on the RMCC.

14.6. It is the responsibility of the Marketing and Sales VPs to ensure that the training takes place and the relevant members of staff and agencies are properly trained.

14.7. New employees shall receive training within 60 days of commencing employment.