

The background is a solid teal color with large, abstract, overlapping geometric shapes in a darker shade of teal. These shapes include circles, semi-circles, and triangles, creating a modern, graphic pattern.

Coca-Cola Great Britain

RESPONSIBLE MARKETING CHARTER
A REFRESHED APPROACH



Coca-Cola Great Britain is committed to responsible marketing. We respect the role of parents and therefore do not target the marketing of any of our drinks to children under the age of 12.

We review all marketing initiatives to ensure that they comply with these principles. We also require that our external partners, including media buyers and marketing agencies, abide by our standards and policies. We take our responsibilities in this area very seriously.

We also believe in choice. We will always offer and promote a broad choice of still and sparkling drinks in a range of pack sizes including 'Coca-Cola', 'diet Coke' and 'Coke Zero', 'Minute Maid' 100% fruit juice, 'Malvern' Water, 'Powerade' sports drinks and 'Schweppes' soft drinks.



We continue to review and improve our policies to keep up to date with the fast-changing marketing environment and commercial world. We apply our responsible marketing principles to all traditional and non traditional marketing media. As technology evolves we will continue to strengthen our approach.

We believe that companies can and should ensure that their marketing practices are in line with societal expectations – we are and will remain a responsible producer.

We believe that industry can work collaboratively with the public, our customers, regulators and other stakeholders to define and ensure

compliance. In addition, we have been listening to parents' concerns about advances in on-line marketing.

We will continue to hold ourselves and our partners accountable. We expect all of our agencies and partners to adhere to these principles. Where practicable we will use the services of independent specialist consultancies to audit and monitor our activity externally to ensure compliance.

Children, as defined by the age of under 12, may lack the necessary skills and judgments to properly understand the purpose of commercial advertising (1). At 12, they have developed their behaviour

as consumers and effectively recognise advertising and understand its persuasive intent (2). By this age they have the necessary cognitive tools to critically assess marketing messages (3). It is also the age children move from a primary to a secondary school environment and therefore is a realistic age around which to frame our approach.

Coca-Cola Great Britain has developed this Responsible Marketing Charter specifically for the GB market, building on our European and global commitments.

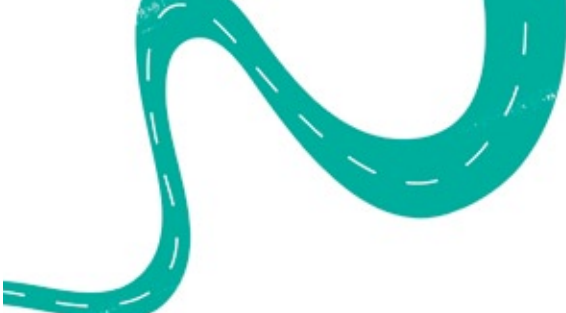


Our journey over the past few years...

In 2006, we took the decision to switch a year ahead of new regulations guiding what food and drink products could be sold in secondary schools in England and, working closely with the School Food Trust, introduced our new schools drinks portfolio which includes 'Minute Maid' 100% juice and 'Malvern' Water.

In line with our marketing principles we do not have direct commercial agreements with primary schools.

At EU level we signed up, in January 2006, to the European non-alcoholic beverages sector (UNESDA) responsible marketing commitments. These commitments bind the industry to act responsibly in the marketplace. They commit to providing consumers with variety and choice, through offering a range of pack sizes and a selection of beverages, including low and no-calorie options.



In 2007 Ofcom introduced rules restricting the advertising of foods high in fat, salt and sugar (HFSS).

We will not target any marketing of any of our drinks to children under the age of 12 and therefore we will not advertise any of our drinks on children's TV channels. We meet all local laws and regulations and comply with the new marketing restrictions set by OFCOM limiting advertising on programmes targeted primarily to young people under 16.

In 2008 the Government, led by Ed Balls MP, Secretary of State for Children, Schools and Families (DCSF), took steps to reflect the changing world and published

the children's plan which led to the Byron Review looking at the impact on children of exposure to potentially harmful or inappropriate material on the internet and in video games. The review recommended the creation of the UK Council for Child Internet Safety which was launched in November 2008.

Also in 2008 the Government commissioned the UK's leading academic on children and the internet, Professor David Buckingham, to lead a further review: 'Assessing the Impact of the Commercial World on Children's Wellbeing' which is currently looking at the impact of commercialism in the round.

Coca-Cola Great Britain made submissions to the Buckingham review and, working with the International Business Leaders Forum (IBLF), invited Professor Buckingham to take part in a series of roundtable discussions with Government, industry and children's groups showing the importance of developing a collaborative, common sense and realistic approach to responsible marketing.



The background is a solid teal color. It features several large, stylized question marks and circles. One large white question mark is in the upper left. A large white circle is in the upper center. A large red question mark is in the middle right. A large black question mark is in the lower center. A large white circle is in the lower right. The overall design is modern and minimalist.

Where next?...

Sharing our Charter in 2009 with our key stakeholders is the next step in our approach to get their thoughts and feedback. It allows us to clarify our responsible marketing commitments, and shows how marketing can remain a positive force for good in the changing times ahead.

We want to maintain a dialogue too and will be working again with the International Business Leaders Forum to launch and facilitate a responsible marketing network bringing together responsible marketing practitioners in a 'trusted space' to share latest thinking, best practice and to problem solve together.

Highlights from our Responsible Marketing Charter...



e believe in **choice**. We will always offer and promote a broad choice of still and sparkling drinks in a range of pack sizes including 'Coca-Cola', 'diet Coke' and 'Coke Zero', 'Minute Maid' 100% fruit juice, 'Malvern' Water, 'Powerade' sports drinks and 'Schweppes' soft drinks.



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e believe that industry can work **collaboratively** with the public, our customers, regulators and other stakeholders to define and ensure compliance.



e will not only be open and transparent about our activities but also consultative and encourage **feedback and a dialogue** - this Charter is not only based on what we believe is right, but also what others are telling us is right.





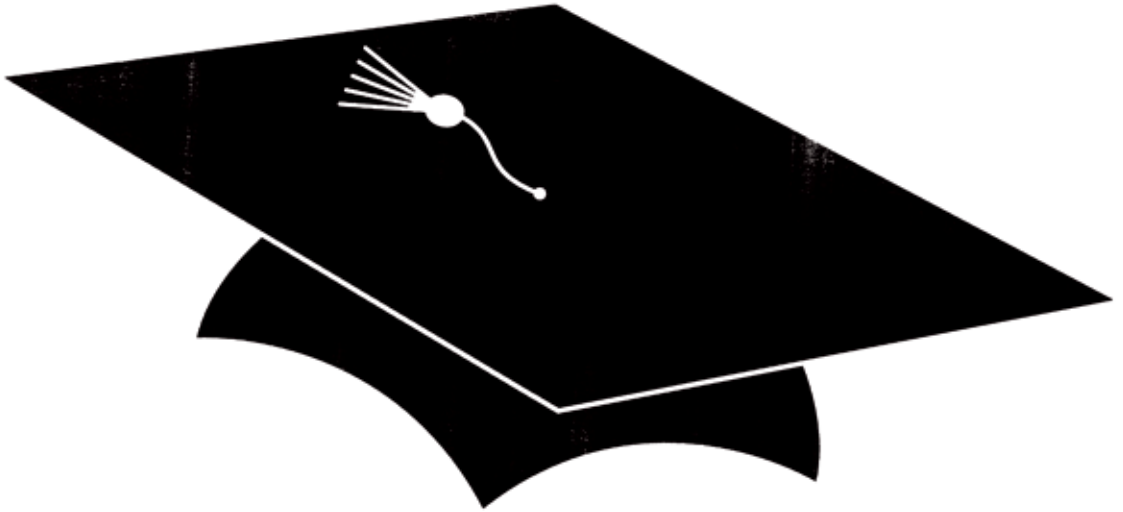
e fundamentally believe that parents should choose the drinks that are right for their families and we continue to help parents make informed choices through better consumer information. We will not undermine **parental guidance** about the importance of a healthy diet and an active lifestyle.



e will continue to hold ourselves and our partners **accountable**. We expect all of our agencies and partners to adhere to these principles. Where practicable we will use the services of independent specialist consultancies to audit and monitor our activity externally to ensure **compliance**. We will also review the way we are audited as new technology becomes available to us.

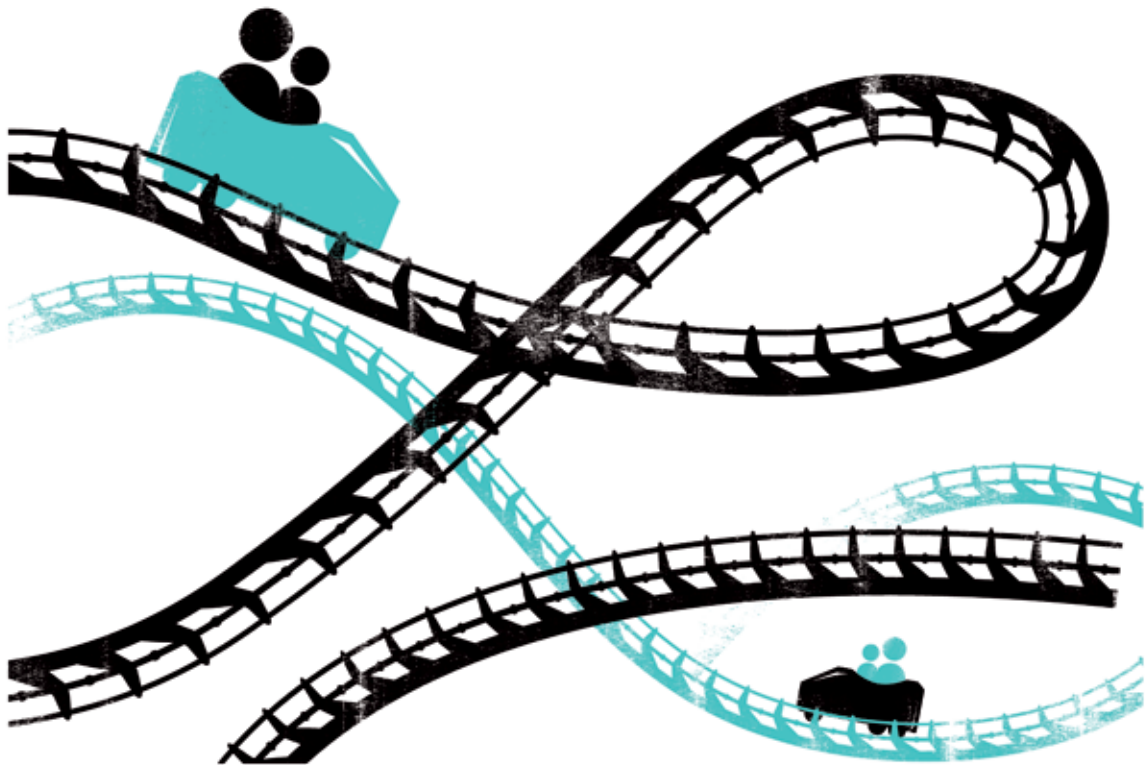


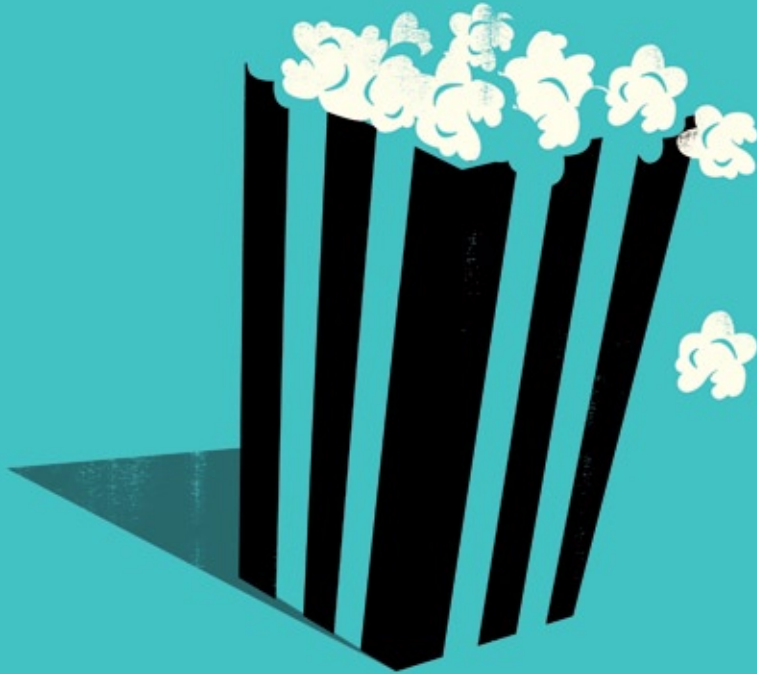




e will only have a presence in **secondary schools** where invited by school authorities and will adhere to local laws and regulations regarding drinks choices in that unique environment.

To help consumers make healthier drinking choices when **eating out**, we will endeavour to work with our customers, including cinemas and theme and leisure park partners, to encourage them to offer a choice of pack sizes and nutritional messaging which is clearly visible to help parents make informed choices.





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e will not associate ourselves (for example product placement, sponsorship or advertising) with films for **cinema** if the core target audience is under 12, nor will we associate our brands with animated films with a strong appeal to under 12s . We will only access films with U or PG rating (as certified by British Board of Film Classification) with a predominately adult audience composition.



we are committed to contributing to the responsible drinking debate. We will run campaigns to promote the positive role soft drinks can play as credible **alternatives to alcohol.**

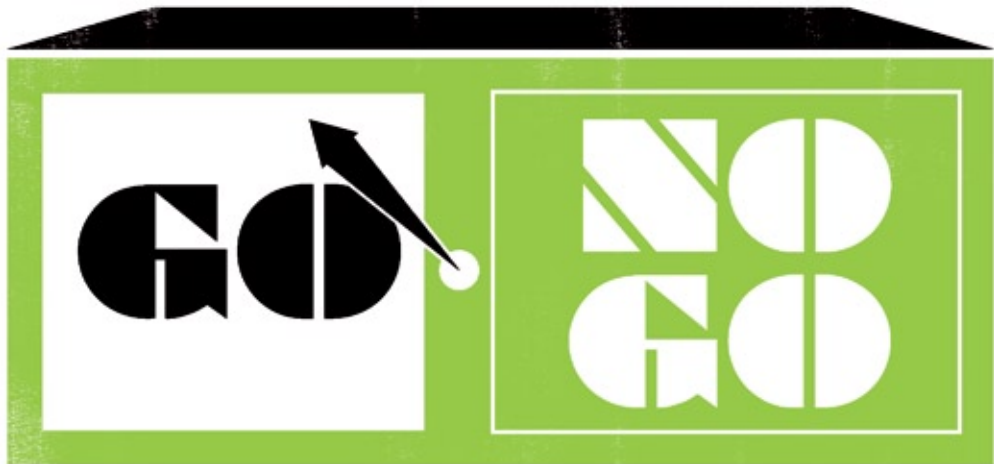







Our principle of not targeting marketing to under 12s applies to **online communications** which require registration. The demographic profile of each site is reviewed and we will not market any brands on sites that have more than 50% composition of unique

users under the age of 12. We will use our own industry-leading template to assess the suitability of all digital campaigns and websites. Each site will come with a 'go/ no go' indicator and will supply specific detail to enable confidence for inclusion or exclusion from the campaign.





e will be **honest and explicit** where we engage social networking sites, brand websites and when brand spokespeople are speaking on our behalf.



e will only use online **targeting of rewards** at consumers aged 12 and over. Where applicable, proof of age will be required to claim appropriate rewards. Only those aged 12 and older will be eligible to

register on our websites and although not foolproof as consumers may 'overclaim their age', based on the current technology available to us, 'cookies' will be used on websites to prevent details being changed.

Sorry, you're a bit too young to enter this.

Come back when you're older

Date of birth

10 | ↕

Feb | ↕

1999 | ↕





e will use audience demographics when using **mobile phone marketing**. However given the limits of current technology, younger audiences may receive some marketing messaging, as they tend to 'pay as you go' which does not require them to provide personal data.





**No Purchase
Necessary!**



we will offer **responsible promotions** which offer a choice of ways of winning including free prize draws, instant wins and no purchase necessary which are not linked to excessive consumption of any of our drinks. All promotions will aim to offer both a regular and diet or zero sugar choice where they exist.

We will protect the data of those participating in our marketing activity – we will comply with all **data protection** regulations and have very clear **opt-in** choices to guard against unsolicited communication. We will only ever ask for the minimum amount of personal data and will not pass this data onto third parties for marketing purposes.





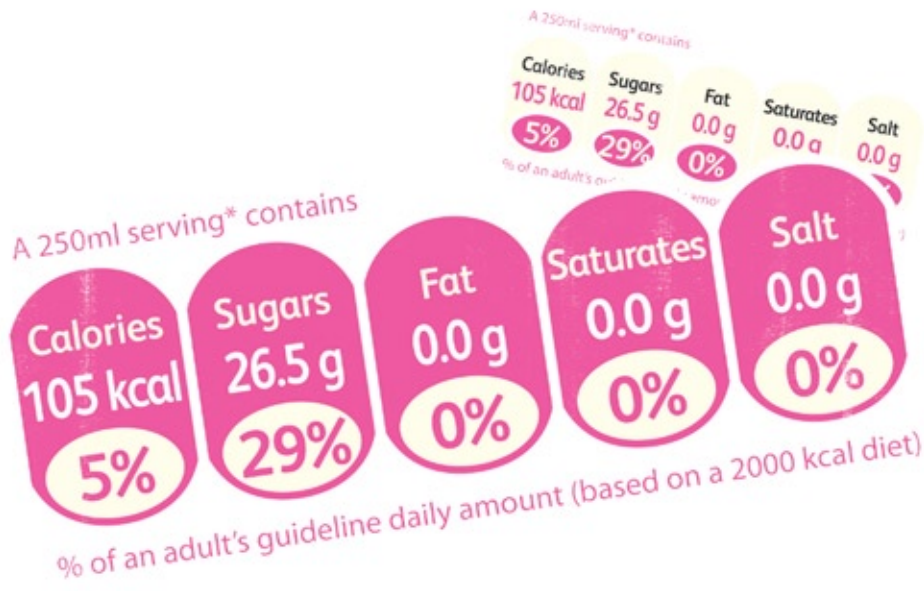
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e will encourage parents to supervise their children's online activities and consider using parental control tools from online services and software manufacturers that help provide a friendly and appropriate online environment. Such tools may prevent those under 12 from disclosing online their name, address and other personal information without **parental permission.**



long with the majority of the food and drink industry, we will include nutritional and calorie content **information** based on a percentage of an adult's guideline daily amount and a 2000 kcal diet. In addition, we will include ingredient and serving size

information clearly on pack, on brand and company websites and at point of sale to help consumers make informed choices. We will advertise on pack the diet, low or zero calorie content of our drinks with such characteristics. We will also flag high caffeine content information on drinks where appropriate.

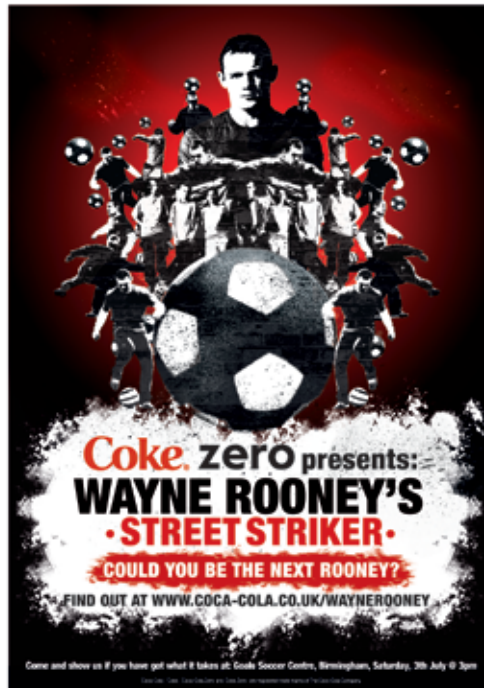






e will target marketing activities to promote individual and community participation in **healthy living** activity. Physical activity helps young people build motivation and self-esteem, encourages participation and engagement, whilst helping

them stay healthy. Encouraging young people to be more physically active through our corporate brand communications and through the use of positive role models is a central part of our health and wellness approach.





e will continue to be part of a **broad coalition** to promote healthy diets and physical activity. Industry has an important role in being part of the solution to the obesity crisis, and Coca-Cola Great Britain will continue to assist Government in meeting its public health policy objectives and will encourage regulators to provide consumers reassurance around the quality and safety of our drinks.

1. Institute of Medicine, Food Marketing to Children and Youth: Threat or Opportunity, 2005
2. Livingstone and Helsper, Advertising Foods to Children: Understanding promotion in the context of children's daily lives, 2006; Ofcom, Childhood Obesity - Food Advertising in Context (review of academic research conducted by Prof. Sonia Livingstone, LSE, London, UK), 22 July 2004
3. The Development of a Child into a Consumer, Vlakenburg and Cantor, University of Amsterdam, University of Wisconsin-Madison, NL and US, 2001



Made from recycled paper

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for copies of the full Responsible Marketing Charter, or if you have any comments, or want to be part of the dialogue, please contact:

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'Coca-Cola', 'Coke', 'diet Coke', 'diet Coca-Cola', 'Coke Zero', 'Coca-Cola Zero', 'Powerade', 'Minute Maid' and the design of the Coca-Cola Contour Bottle are registered trade marks of The Coca-Cola Company. 'Schweppes' and 'Malvern' are registered trade marks of Atlantic Industries.



