

Coca-Cola Great Britain

Responsible Marketing Charter - A Refreshed Approach

The Coca-Cola Company 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.

This Charter is intended to be a common sense and realistic approach. We continue to review and improve our policies to keep up to date with the fast-changing marketing environment and commercial world. In addition we have been listening to parents' concerns about advances in on-line marketing.

Children, as defined by the age of under 12, may lack the necessary skills and judgements to properly understand the purpose of commercial advertising (1).

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

Responsible Marketing Charter Core principles

- We believe that companies can and should ensure that their marketing practices are in line with societal expectations – we are and will remain to be a responsible producer. We believe that industry can work collaboratively with the public, our customers, regulators and other stakeholders to define and ensure compliance.
- We will continue to offer a wide choice of drinks from still and sparkling, waters, juices, sports and energy drinks in a range of pack sizes and calorie content.
- We will continue to ensure our marketing values remain focused around positivity and optimism – which The Coca-Cola Company has stood since drinks were first sold 120 years ago
- We apply our responsible marketing principles to all traditional and non traditional marketing media
- At 12, they have developed their behaviour as consumers and effectively recognise advertising and understand its intent. By this age they can critically assess marketing messages. (2). 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.
- We 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.
- We will only use the services of external agencies who agree to honour our standards and responsible marketing policies when dealing with our brands.
- We will continue to hold ourselves and our partners accountable. We expect all of our agencies and partners to adhere fully 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.
- We will continue to be part of the 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 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.

- We will not only be open and transparent about our activities but also consultative – this Charter is not only based on what we believe is right, but also what our others are telling us is right

TV Advertising

Coca-Cola Great Britain:

- 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
- Will 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.
- Will work with an independent specialist consultancy to constantly monitor TV ad placement – we will change TV placement if we deem appropriate. We use standard industry data to measure audience composition.

Offline Marketing (Schools, cinemas, theme parks, restaurant chains)

Coca-Cola Great Britain

- Does not have direct commercial agreements with primary schools.
- 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
- 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
- Will work with external agencies to determine the core target audience of a film prior to a marketing agreement.

- To help consumers make healthier drinking choices when eating out, 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 will encourage nutritional messaging which is clearly visible to help parents make informed choices.
- Will encourage our customers including cinemas and theme and leisure park partners to adhere to our marketing principles when using our drinks and brands in their own activity and to offer a low-sugar or diet variant of our drinks with our regular soft drinks and to promote both with equal prominence. Where appropriate, we will highlight the diet variant in meal deal choices
- Will not offer Coca-Cola branded merchandise which is targeted at children under 12 in any marketing promotion.

Online marketing (online marketing, mobile and other forms of marketing using interactive technologies)

Coca-Cola Great Britain:

- Will continue to listen to parents' concerns about the impact of online marketing to children under 12 (for information on how, see openness and transparency section)
- 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.
- Will use our own industry-leading template to assess the suitability of all digital campaigns and websites. Each site will come with 'go/ no go' indicator and will supply specific detail to enable confidence for inclusion or exclusion from the campaign.
- 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.
- Will specify the mobile network provider not to charge premium SMS or phone rates when it runs promotions on our behalf.

- Will ensure that any brand-led video channels established on internet sites are done responsibly and in line with our responsible marketing commitments. We will be honest and explicit where we engage social networking sites, brand websites and when brand spokespeople are speaking on behalf of Coca-Cola Great Britain that it is a marketing campaign.
- 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.
- 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.
- When developing on pack promotions, we will only associate ourselves with computer games and online gaming and content which is in line with our responsible marketing approach. Whilst games might have a PEGI (The Pan-European Game Information age rating system to help European parents make informed decisions on buying computer games) rating of +3, we will only use and provide games that reflect a target audience of over 12.
- Will offer responsible promotions which offer a choice of ways of winning including free prize draws, instant wins, 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.
- 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.

Sports and physical activity marketing

Coca-Cola Great Britain:

- Will target marketing activities to promote individual and community participation in active, 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 positive role models is a central part of our health and wellness approach.
- Will continue to support participatory sports events in the secondary school environment to promote the benefits of a healthy, active lifestyle. We will always ensure that physical activity programmes in secondary schools are developed and implemented in close collaboration with parents and teachers – the brands associated with these programmes will be those suitable for the secondary school environment based on School Food Trust guidelines in England and those of the devolved governments of Scotland and Wales.

Responsible marketing and alcohol consumption

- We believe soft drinks provide a credible alternative to alcoholic drinks – we are also committed to contributing to the responsible drinking debate
- Where we run promotions of our drinks in partnership with alcohol suppliers we will include 'drink responsibly' messaging as we are committed to encouraging the responsible alcohol consumption
- Will not glamourise or condone the excessive drinking of alcohol or promote or encourage drunkenness and will not condone the irresponsible consumption of energy drinks with alcohol and will include point of sale information in licence outlines stating 'Drink Responsibly'
- Will run campaigns to promote the positive role soft drinks can play as alternatives to alcohol consumption

Marketing activities and the environment Our green commitments*: Coca-Cola Great Britain

- With the development of more sophisticated ways to calculate the environmental footprint of individual products, we will continue to minimise the environmental impact

of our products and operations and we will look to share this information with interested consumers via our corporate responsibility website www.cokecorporateresponsibility.co.uk.

- Will always ensure that the 'Recycle Now' logo is clearly communicated on pack:
- Will state “this pack is 100 percent recyclable” on packaging where appropriate to encourage consumers to recycle.
- Will strive to increase the amount of recycled content within all our packaging in line with our sustainability commitments and will work with customers, suppliers and local authorities to do this
- Will always be mindful of the environmental implications of any marketing activity including new product development, packaging and recyclability and recycled content
- Will always ensure, that during sampling promotions, infrastructure is in place to maximize and encourage consumer recycling.

*for further details of all our environmental commitments, not just those associated with our branding and marketing activities as listed above, please go to <http://www.cokecorporateresponsibility.co.uk/environment/index.html>

Openness and transparency about our drinks – Coca-Cola Great Britain

- Along 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 on 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
- Will also be consultative with consumers and stakeholders and encourage feedback and a dialogue

Compliance

- These principles will be audited externally and independently to ensure compliance
- We have systems in place to ensure all colleagues are aware and understand their responsible marketing commitments and that our principles are embedded into every activity. All colleagues are responsible for ensuring compliance.

Appendices

Children, as defined by the age of under 12, may lack the necessary skills and judgements to properly understand the purpose of commercial advertising (1).

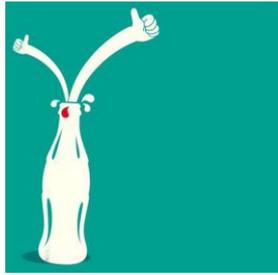
- Institute of Medicine (2006), *Food marketing to Children and Youth: Threat or Opportunity?* Washington, D.C. The overall conclusion of this study was, “age has not been found to be a consistent moderator of advertising effects on precursors of diet,” (page 294)

At 12, they have developed their behaviour as consumers and effectively recognise advertising and understand its intent. By this age they can critically assess marketing messages. (2).

- Livingstone, S. and Helsper, S. (2006) *Does advertising literacy mediate the effects of advertising to children? A critical examination of two linked research literatures in relation to obesity and food choice*, Journal of Communication, 56, 560-584. The text states: “However, by about 7 or 8 years of age, children have learned to identify the persuasive intent of advertising, distinguishing it from information although, as Roedder (1981) added, they often do not use this knowledge spontaneously and must be cued to do so (see also Brucks, Armstrong and Goldberg, 1988; John, 1999; Moore, 2004). Last, from about the age of 12 years of age, children can articulate a critical understanding of advertising and of the intentions of its producers (refs.) even becoming skeptical or distrustful of advertising (refs.)”(page 562)

The EU has established 12 as the “new 6”. Robert Madelin, DG of DG Sanco, Snackex Conference Barcelona, June 2006

'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.



If you have any comments on this Charter, or want to be part of the dialogue, please contact:

Celia Smith

Head of External Affairs

Coca-Cola Great Britain

Tel: 020 8237 3532

celsmith@eur.ko.com