

## Scope of the Code

The Code applies to all forms of brand marketing and commercial communications for all AB InBev products that contain alcohol, use an alcohol trading name, or are an alcohol-free or non-alcohol beer product including, but 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 website and social media;
- branding, packaging and labeling;
- brand promotions;
- consumer and trade and brand public relations activities;
- experiential marketing programs such as music events, sporting events, culinary events, etc. and promotional activities;
- sponsorships including through sports, groups, events, product placement, celebrities or influencers;
- category marketing;
- product placement; 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 AB InBev products without the express permission of the company;
- communications in which AB InBev was neither involved in the creation, nor in the distribution of the content and did not officially endorse the content; 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 AB InBev'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.

For the purpose of this code "company" and "AB InBev" shall mean AB InBev, its affiliate companies, and related companies ("AB InBev" in this Article), but for the necessary cases, it may include other companies conducting marketing, advertising and promotion for AB

InBev through the execution of the agreements.

## 1. General Principles

- 1.1. All forms of commercial communications involving Anheuser-Busch InBev beer brands 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;
  - reflect generally accepted contemporary standards of good taste and decency;
  - 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. Commercial communication will be governed by the local law for the market in which the materials are to be used. When creating global communication materials, the most stringent standards will be applied.
- 1.4. AB InBev may, at its 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 purposes 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 AB InBev's policy not to direct commercial communication to individuals below the age of 18.
- 2.2. AB InBev's 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. Paid actors or models in commercial communication must be, and must reasonably appear to be, at least 25 years old.
- 2.6. In a controlled environment, where an age affirmation mechanism is used to ensure the user/ viewer is over the legal drinking age, all people and celebrity spokespersons featured in commercial communication may be younger than 25 years but they must be, and must reasonably appear to be, LDA+ if they are paid; additionally, non-paid people must be at least of legal drinking age.

- 2.7. All members of brand promotions teams must be, and must reasonably appear to be, at least 21 years old.
- 2.8. All persons featured in user-generated content must be, and must reasonably appear to be, at least of legal drinking age. If such content is re-used by us or on our behalf, then clauses 2.5 – 2.6 above will apply.

**AUDIENCE**

- 2.9. 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 or older.
- 2.10. 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.
- 2.11. Our media partners will provide – where available – post-placement monitoring reports on audience composition at yearly intervals to verify compliance, to the highest practical level.
- 2.12. 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.
- 2.13. 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**

- 2.14. All websites and platforms owned or managed by AB InBev 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 at least of legal drinking age can access the site. If 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.”
- 2.15. Shareable content should include a clear reminder or forward advice notice stating that recipients should also be at least 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 co-ordination 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.

**6. Health Aspects**

- 6.1. 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.
- 6.2. 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.
- 6.3. Other evidence-based nutritional information could be permissible provided it has been approved by the Corporate Affairs, Legal and Supply teams at the Global and Zone level.

**7. Alcohol Content**

- 7.1. 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.
- 7.2. 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.

## 8. Responsibility Messaging

- 8.1. 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.
- 8.2. A responsibility message will include at least one of the following statements or an associated icon, or its substantial equivalent as determined by local management:
  - 8.2.1. Don't drink and drive;
  - 8.2.2. For people over the age of (legal drinking age) only;
  - 8.2.3. Pregnant women should not drink alcohol; and,
  - 8.2.4. Enjoy Responsibly.
- 8.3. 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-connection materials (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).
- 8.4. All websites and platforms owned or managed by AB InBev should show a link to TapIntoYourBeer.com or to an appropriate local responsible drinking website (e.g., DrinkAware.co.uk).
- 8.5. The inclusion of a responsibility message or icon from 8.2 and a reference to TapIntoYourBeer.com or an appropriate local responsible drinking website is mandatory on all new primary or secondary packaging.

## 9. Direct Communication and Privacy

- 9.1. Any type of direct communications to consumers, such as letters, loyalty schemes, gifts, e-mails, texts and other instant messaging, digital applications and other relationship marketing will be permission-based. We should seek specific consumer consent, including exact date of birth and country (for Zone or Global communications) affirmation, prior to delivering any direct communication to consumers, excluding the communication to obtain consumer permission itself.
- 9.2. 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.
- 9.3. We will provide consumers with a clear and transparent mechanism to opt out of receiving direct communications and data processing.
- 9.4. 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.
- 9.5. We will provide consumers clear data privacy statements on all brand and corporate websites and platforms that collect or use consumer data.
- 9.6. At the different points where AB InBev may collect data for relationship marketing purposes, we will inform users how the information is collected and used.
- 9.7. We will provide reasonable security for data collected in compliance with all applicable laws and regulations.
- 9.8. 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.

- 9.9. We will require third parties providing online behavioral advertising (OBA) on behalf of AB InBev 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 U.S.A.

## 10. Digital Media

- 10.1. We apply the same minimum standards to all of our communication, including those on digital media. Digital media is a key channel for our communications, which includes but is not limited to:
    - websites under AB InBev'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 (UGC) under AB InBev's control;
    - viral advertising under AB InBev's control;
    - social media brand pages or channels, including but not limited to, Facebook, Instagram, Twitter, YouTube, etc.;
    - downloadable applications (apps); and,
    - video games.
  - 10.2. 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.
  - 10.3. 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.
  - 10.4. User-generated content (UGC) that is placed on sites or platforms that are controlled by AB InBev will be moderated on a regular and frequent basis, and we will strive to remove any inappropriate content within 48 hours of when it is posted. Sites or platforms that are controlled by AB InBev will include guidelines on user-generated content stating what type of content users should and should not display on the AB InBev-controlled site or platform.
  - 10.5. This Code does not apply to user-generated content (UGC) that is placed on websites or platforms over which AB InBev has no control.
  - 10.6. User-generated content that is subsequently used in AB InBev'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. Product Placement, Brand Sponsorship and Promotions
- ### GENERAL
- 11.1. This Code applies to overall placement, sponsorship or promotion agreements, including any material carrying

company or brand logos, for the duration of the agreement.

- 11.2. The relevant approval process should be consulted in order to review and authorize the nature and elements of the placement, sponsorship or promotion proposal.
- 11.3. None of our placements, sponsorship agreements, brand promotions, displays or events will be directed to those under the legal drinking age.
- 11.4. 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**

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

#### **CELEBRITIES AND SPOKESPERSONS**

- 11.7. Sponsored persons or brand spokespersons, such as celebrities, athletes and singers, must be, and reasonably appear to be, LDA+.
- 11.8. A minimum of 70% of the sponsored person's or brand spokesperson's fan base shall be reasonably expected to be at least of legal drinking age.

#### **SPONSORSHIP**

- 11.9. Brand sponsorship means a commercial agreement by which AB InBev 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.
- 11.10. 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 at least of legal drinking age.
- 11.11. 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.

#### **PROMOTIONS AND BRAND EVENTS**

- 11.12. To the extent it is in AB InBev's control, alcohol must not be supplied to visibly intoxicated persons or those under the legal drinking age.
- 11.13. 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.

- 11.14. No pressure will be placed on people to participate in our promotional activities.
- 11.15. All of our promotions and promotional materials will follow cultural standards of good taste and not encourage irresponsible consumption of alcohol either through volume, time span or in any other way.
- 11.16. Games that require drinking alcohol as an element of the game are not allowed.
- 11.17. 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.
- 11.18. Wherever possible non-alcohol beer, water and/or soft drinks must be available during the promotion.
- 11.19. Servers and sellers at promotional events will be trained on responsible serving and selling of alcohol as well as local legal requirements, preferably with a certified program if available.
- 11.20. To support our belief in responsible alcohol consumption, we will limit open bar sponsorships to reputable events where attendance is strictly limited to people at least of legal drinking age, or where all servers have been certified as trained on responsible serving of alcohol.
- 11.21. AB InBev staff in charge of AB InBev-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 co-operation with local transportation companies or local authorities to guarantee easy access to safe transport.

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

- 12.1. For the purpose of this Code, Alcohol-Free Beer Products are defined as all AB InBev beer products with an ABV of 0.0% (Brahma 0.0%; Hoegaarden 0.0%; Budweiser Prohibition Brew). Non-Alcohol Beer Products are defined as all AB InBev beer products with an ABV of 0.1% to 0.5% (e.g., Beck's Non-Alcoholic, O'Doul's Non-Alcoholic Brew). Local legal definitions may also apply.
- 12.2. 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.
- 12.3. 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:
  - 12.3.1. 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;
  - 12.3.2. 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,
  - 12.3.3. We may promote drinking alcohol-free and non-alcohol beers as a "substitution strategy" to avoid overconsumption during a drinking occasion by reducing the number of alcohol beverages consumed.
- 12.4. Product placement requests for AB InBev 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**

Compliance with the RMCC is everyone's responsibility. All AB InBev Sales and Marketing teams (including but not limited to Media Planning and Buying, Innovations, Promotion, Event and Sponsorship etc.), and external agencies shall follow both the spirit and the letter of the RMCC or other local self-regulatory codes, where applicable.

### **COMPLIANCE**

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

- 13.1. 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.