



EDRINGTON



Marketing  
Code



Edrington Code

# CODE OF PRACTICE FOR THE RESPONSIBLE MARKETING AND PROMOTION OF EDRINGTON BRANDS

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# INTRODUCTION



## Edrington Codes

As a responsible company, with a strategic vision to grow a sustainable long-term business, it is important that our brands are promoted and enjoyed responsibly.

We introduced this Code in 2007. Now in its sixth edition, it is supported by a training programme available via Edrington's online training platform. This latest edition has been broadened in scope, recognising the growing importance of responsible marketing in an increasingly regulated environment.

In addition to this Code, we strongly support industry self-regulation. We are signatories of the marketing codes of practice of The Portman Group and The Scotch Whisky Association and support associated codes around the world. We also adhere to the OFCOM Broadcasting Code and equivalent regulations in overseas markets. In markets where less rigorous regulations apply, we adopt the same principles as those in the UK.

*The*  
**MACALLAN**

  
**THE FAMOUS  
GROUSE**

**BRUGAL** 

  
**HIGHLAND  
PARK**

**THE  
GLENROTHES**  
ESTD 1879

  
**SNOW  
LEOPARD**



## OBJECTIVES

The objective of this Code is to ensure our brands are promoted responsibly and in line with our ethics and values. It provides guidance for those working with our brands, so they can deliver responsible, effective and creative marketing, whilst being respectful of different cultures, lifestyles and traditions.



Our aim is to encourage those who drink alcohol to do so responsibly and to discourage alcohol misuse. We also respect the choice not to drink and recognise that some people should avoid alcohol in certain circumstances or altogether.

The principles of this Code cover all commercial communications, including, but not limited to: advertising, marketing, packaging, tastings, events, social media, PR and product placement. The terms 'marketing' and 'promotion' cover all such activity.

Since our brands are enjoyed around the world, marketing teams should account for national differences in legal drinking age (LDA) and local cultural, religious, gender, race and regulatory differences.

This Code applies to all markets, irrespective of the distribution arrangement, and sets out minimum standards we strive to achieve where less restrictive local regulations exist. Where we distribute brands owned by third parties, this Code applies to activity conducted by Edrington on behalf of the third party or on our own initiative.

This Code is not intended to impose restrictions on price-related issues, so should be read in that context.

## RESPONSIBLE DRINKING

The marketing of our brands that portrays responsible drinking as a relaxed, sociable and enjoyable part of life has a role to play in promoting a responsible approach to alcohol.

We also recognise that some people choose not to drink alcohol. We should not seek to challenge that decision or suggest that it is anything other than a legitimate personal choice.

In order to portray responsible drinking, showing responsible consumption and responsible behaviour, we never condone illegal, irresponsible or immoderate consumption (such as binge drinking or drunkenness), or associate drinking with the use of machinery, driving or doing anything hazardous. We never associate drinking with bravado, with violent, aggressive, dangerous or anti-social behaviour, or with illegal drugs.

The message 'Please enjoy responsibly' must be carried on all advertising and print point of sale materials.

UK and EU back labels must also carry Edrington's consumer information panel, showing volume, alcohol and calorie content.

UK and EU labels must add a link to a relevant source of responsible drinking advice ([www.drinkaware.co.uk](http://www.drinkaware.co.uk) in the UK, [www.responsibledrinking.eu](http://www.responsibledrinking.eu) in the EU). Other markets should include links to local equivalents, wherever possible.

In all markets, alcohol responsibility messages must meet or exceed the regulations for that country. Where no legislation exists, the message should be a legible size, colour and location.

Where space allows, back labels must incorporate iconography advising against drinking during pregnancy or before driving.

## DRINKING AND DRIVING

We never condone driving a motor vehicle after drinking or show consumption before or whilst using machinery or doing anything dangerous.



## DISCOURAGING UNDERAGE DRINKING

We must not promote alcohol in any way directed at, or primarily appealing to, people below the legal purchase age (LPA) - sometimes referred to as the legal drinking age (LDA).

We should never feature anyone who appears to be below the LPA or portray images that might appeal to them.

To ensure this happens, anyone shown drinking should be - and look - at least 25 years old. Also, brand logos and names should not be used on clothes, toys, games or other items particularly appealing to people below the LPA.

If a celebrity is used, they should not primarily be associated with, or appeal to, anyone below the LPA.

Print and electronic media should only be used where at least 75% of the audience is expected to be above the LPA. (In markets where a higher threshold is required, we should adhere to that threshold.)

Products must not be associated with the attainment of adulthood or the 'rite of passage' to adulthood.

This Code does not apply to communications that have the clear purpose of educating those under the LPA about the use or misuse of alcohol, or the industry's role in society.



## ALCOHOL CONTENT

### **drinkaware**

We support efforts to promote responsible drinking.

In relevant markets we must provide unit or standard drink information to help people make informed choices. The alcoholic nature of our drinks must be communicated clearly on the packaging in line with national laws.

Information about alcohol content may help people make informed decisions, however, strength or high alcohol content must never be the dominant theme, or be given undue emphasis, when marketing our brands. (The responsible marketing of cask strength products does not breach this Code.) For example, the strength of a product must not be more dominant than the product name on any label or promotional material.



## SEXUAL AND SOCIAL SUCCESS

Our brands and drinkers can be portrayed as part of responsible personal and social occasions. This includes showing people in a romantic or enjoyable setting, showing attractive or affluent people and showing people relaxing.

However, we must not claim that individuals can attain social, professional, educational, or athletic success or status because of drinking alcohol, or that drinking alcohol will help, or is necessary, to solve social or personal problems, or overcome inhibitions, shyness or social barriers. Marketing must not imply that consumption of alcohol is necessary to ensure the success of an event or occasion.

Communications must not suggest that drinking alcohol enhances sexual abilities, attractiveness, masculinity or femininity, or suggest an association with sexual activity or success. We must always adhere to accepted standards of good taste and should not cause serious or widespread offence.



## ALCOHOL AND HEALTH

A lot of literature has been published on the benefits and risks of drinking alcohol. Much of that literature suggests that moderate drinking, for most people, can be part of a balanced lifestyle. But we also recognise that some people should avoid alcohol completely.

Our communications must not create the impression that alcohol can enhance mental or physical capabilities or make any health claims such as suggesting it has therapeutic qualities or the ability to treat illness, or to change mood or behaviour.

Consumers who wish to take advice on drinking alcohol should consult their doctor.



## ENERGY DRINKS

Our brands must not be promoted as energy drinks and we must not support activity that associates our brands with energy drinks.



## MEDIA PLACEMENT

Communications must be aimed at an audience over the LPA. They must be placed on media channels where at least 75 per cent of the audience is over the LPA. When a third party channel's suitability is being considered, an independent source such as a media agency must be contractually obligated to ensure that the channel is suitable in terms of LPA, as well as, content, coverage, and affiliations, with a white list being provided which details any links to organised crime, pornography and the dark web.

Edrington, and its agents, should also consult independent agencies when assessing the suitability of third party channels involved in larger scale media campaigns which involve multiple global channels. We should conduct compliance audits in order to assess the accuracy of the independent parties' processes when considering the third party channels' suitability. Carrying out these audits will demonstrate that we are not only consulting agencies, but that there is also an appropriate level of follow-up with the agencies as well.

## DIGITAL



This Code applies to all digital activity, from mobile messaging and online advertising to social media, blogs and websites. All content must comply with this Code, in addition to all applicable laws and regulations.

## WEBSITES

### Standard Mandatories

A link to Terms and Conditions (T&Cs) must be displayed on every page of every site, and on every online forum. Promotions, competitions, petitions and online sales require additional T&Cs, which users must accept.

A link to Privacy & Cookies must be included on every page of every website, including gateway pages. The display of T&Cs and the Privacy & Cookie Notice must be printer-friendly and should not interrupt user experience.

A link to Drinkaware must be embedded on all our sites.

A responsible drinking message must be included in all communications. Local markets may display additional links to Social Aspects Organisations (SAOs), such as [www.drinkaware.co.uk](http://www.drinkaware.co.uk) in the UK or [www.responsibility.org](http://www.responsibility.org) in the US.

### Preventing Underage Access

Direct interaction with users requires age affirmation where possible. Methods include an age affirmation web page or 'gateway' requiring full date of birth, checks against a registered user database, or an email or instant message. T&Cs, a Privacy & Cookie Notice and a responsible drinking message (including a link to [drinkaware.co.uk](http://drinkaware.co.uk) as tabs or links) must be included.



# BRAND SOCIAL MEDIA

## Underage Access and Social Media

Communications on a brand-controlled social media channel that involve direct interaction with a user require prior age affirmation where possible.

In channels with no age affirmation mechanism:

- At least 70% of the channel's audience must be over the LPA (71.6% in the US, 75% in the UK);
- An age-disclaimer must remind users that the content is intended only for users over the LPA;
- User generated content (UGC) must be monitored and moderated according to this Code and UGC guidelines.

## Content for Sharing

Content designed to be shared by consumers must include instructions that recipients must not forward it to anyone under the LPA. For example: 'Please do not share this email with anyone under 18. Please do not forward this email to anyone under the legal purchase age for alcohol'.

## Content and Moderation

All content must comply with this Code, including any text, music, pictures (photography or graphics), sound recording, text-software, interactive features and user-generated content (UGC).

## Links to Third Party Sites

Content on third party channels must comply with the channel's terms of use. It should be clear that the link goes to a third party channel, with no attempt to disguise who owns the content.

Links must be text unless the trademark or copyright holder has given permission to use images, graphics or logos. They must not imply endorsement or any connection with our brands, unless covered by an appropriate agreement.

## User-Generated Content (UGC)

UGC is material such as text, video or photography, provided by consumers or other individuals in social network sites, brand websites, photo or video sharing websites, blogs or message boards. It must be moderated and governed according to this Code and applicable regulations.

UGC on a third party forum over which we have no editorial control is outside the scope of this Code. UGC submitted to online or mobile sites, pages or apps managed by, or on behalf of us (or third party sites where we have editorial control), must be monitored at least once every working day and moderated according to this Code.

Where we have editorial control, users must accept the T&Cs and our Privacy & Cookie Notice before posting.



Edrington Codes



## **BRAND SOCIAL MEDIA (CONTINUED)**

### **Transparency**

We should be transparent about our identity, always disclosing any association with our Company or our brands. We must never pretend to be a consumer or an ordinary member of the public when creating buzz about our brands or encourage brand ambassadors to disguise their relationship with us.

Further guidance relating to transparency of advertising for brand ambassadors and influencers can be found at [www.gov.uk/government/publications/social-media-endorsements-guide-for-influencers](http://www.gov.uk/government/publications/social-media-endorsements-guide-for-influencers).

### **Individual Social Media Guidelines**

As brand custodians, we all have a responsibility to protect our brands, so it is important that we understand how our behavior is reflected by what we do online. In social media, we must always consider the following principles when acting as individuals and not directly on behalf of a brand:

### **Responsibility and transparency**

Never represent yourself or our brands in a false or misleading way. If you identify that you work for Edrington or our brands, please include a disclaimer that states "All views are my own". This includes any interaction you have across industry or brand societies, appreciation groups or forums.

### **Good judgement**

Consider your audience. Avoid comments that can be interpreted as demeaning, inflammatory or a slur. Always consider how your comments will reflect on Edrington, our brands and yourself. Rather than respond to negative comments, alert the relevant channel owner to them.

### **Confidential information**

Sometimes, areas of our work are sensitive or confidential. Keep them that way. Do not share unpublished or confidential content such as sales figures, new product development or partner information. If in doubt, contact Edrington Legal or the relevant Brand Director for guidance.

### **Tone of voice**

Be polite. Try not to antagonise, patronise, or be defensive or personal on social media. We look to you to uphold the reputation and values of our organisation (and our brands). Act responsibly and ethically and be careful about what information you share.

## DATA, PRIVACY AND SECURITY

### GDPR

General Data Protection Regulation (GDPR) requires us to process personal data in an open and fair manner, while recognising the importance of securely protecting this data whenever it is handled.

As a company that collects, uses and stores personal information, we must get clear, unambiguous consent from individuals (or have another legal basis) to use their personal data. We must also give consumers access to their personal information and control how it is used.

Additionally, where we use agencies or consultants as data processors, we must ensure they have enough measures in place to process personal data fairly, openly and securely. A data processing agreement must also be in place between the parties. If in doubt, contact Edrington Legal.

Key implications are:

### Websites

Clear messaging is required on websites with consent options, and the website's privacy notice should clearly indicate how user data will be used and who it will be shared with.

### Email CRM

Consent management processes are required for email CRM lists. This ensures any user who receives emails has opted in to receiving them from us. We must keep a record of consent given by consumers to receive our communications.

### Increased Responsibility and Risk

As advertisers, we are also responsible for ensuring data consent when buying through publisher sites. For example, if we used data to help enhance targeting on Google, we bear responsibility for ensuring the data meets GDPR requirements and that consent has been acquired. Another example would be in programmatic buying where third party data segments are often used for targeting audiences through Demand Side Platforms like ad form or DBM. It's our responsibility to ensure any data used is GDPR compliant.

## DATA, PRIVACY AND SECURITY (CONTINUED)

It also applies for businesses. For example, if you have a PR contact list, journalists will still have to give consent for us to contact them.

### Agency Management

Prior to engaging any new agency or supplier to process personal data on our behalf, you must contact Edrington Legal to put in place the relevant legal requirements. Thorough checks need to be carried out by the brand team, with support from Legal and IT, to determine whether the third party has the technical standards in place to securely process personal data. We must also enter into data processing agreements with all data processors to agree the obligations and responsibilities of both parties.

The impacts of GDPR are wide ranging and require our marketing and brand teams to have a general understanding of the key principles and impact. It also requires them to work closely with their markets and other internal functions like IT and Legal.

Please refer to Edrington's Information Management and Data Protection Handbook, available on our intranet, for further information and guidance. If you have any specific questions or need support on a project involving personal data, please contact [dataprotection@edrington.com](mailto:dataprotection@edrington.com).

### Consent

We respect privacy rights whenever we process personal data. This means that our direct marketing is based on permission. The Edrington Information Management and Data Protection Code must be adhered to at all times ([https://teghub.edrington.com/it/dataprotection/Documents/IMDP\\_Code.pdf](https://teghub.edrington.com/it/dataprotection/Documents/IMDP_Code.pdf)).

### Online Behavioural Advertising (OBA)

OBA enables better targeting of ads. Third party advertising networks partner with sites to collect data on users' viewing behaviour, to deliver advertising that is more likely to be of interest. However, people should always have a choice whether they wish to benefit from this or not.

Third party networks should:

- Give a clear notice about the collection and use of this data (in or around the ad);
- Obtain consent for the information captured;
- Not target individuals under the LPA.

### Protecting our Intellectual Property

We must protect our brands and intellectual property rights (IPR) and avoid infringing the rights of others.

Our marketing must not:

- Use UGC or third party intellectual property without prior consent;
- Disclose any confidential or commercially sensitive information;
- Post third party materials without their consent;
- Any new IPR created by, or on behalf of, Edrington or our brands must be appropriately protected. Consultation with Edrington Legal is recommended for any IPR related matters. None of our brand IPR should be licensed or assigned without prior approval from Edrington Legal and the Brand Director.

### Information Security

We should adopt adequate technical and organisational safeguards to protect the integrity of our channels, their contents and our consumers' privacy. Sites must be developed, hosted and tested in line with our IT guidelines:

[https://teghub.edrington.com/sites/myteams/it/applications/web\\_systems/SitePages/Home.aspx](https://teghub.edrington.com/sites/myteams/it/applications/web_systems/SitePages/Home.aspx)

### Responsible Consumer Research

A range of tools is available to track conversations and behaviour in social media (often called 'listening' tools). Anything that enables us to 'listen' to these conversations is still consumer research and we must respect the privacy and confidentiality of this information where possible.

As these tools often involve interaction with personal data, always check the process to track and gather data – you may need explicit consent in some markets.

Platform data such as Google Insights or Trends, and other publicly available tools, can be used to plan media spend for keywords and volume. All search criteria must comply with this Code and findings intended for developing future campaigns or projects verified through 100% LPA+ research.

Clicks or engagement metrics can be used to optimise spend or the creative that is being used. Aggregate data (non-Personally Identifiable Information, non-verbatim) may be used to report on, and analyse, effectiveness (for example # of Tweets using @[Brand], #[Campaign Tag], product or campaign mentions).

Care must be taken to avoid processing Personally Identifiable Information (PII) of a sensitive nature (medical, sexual orientation etc.) or to conduct activities in markets where they are not permitted by law.

## SPONSORSHIP



All new sponsorships must contain a recognisable commitment to promoting responsible drinking or supporting diversionary or community activities.

We do not sponsor individuals, teams, events, tournaments, competitions, bands or celebrities who appeal to people under the LPA. (We can sponsor a team, band or group that features under age members, provided at least 75 per cent of the overall participants are old enough and that they do not mainly appeal to a young audience.)

We should always use our best efforts to get a profile of our audience, to ensure that 75 per cent are of the required age. Where data is not available, anticipated data or data from a comparable event should be used. Sponsorships at events that do not meet this threshold are permitted if restricted to defined areas at which 75% or more attendees are over age. In these cases, we will not be the main sponsor but could be one of several sponsors.

Competitions for tickets, which include the provision of alcohol, must not be open to anyone under the LPA.

Before commencing a sponsorship, we must establish whether an association with alcohol and the sponsored party would be inappropriate under this Code.

Sponsorship of activities that may be hazardous after drinking alcohol (for example, motor racing, sailing or skiing) is not necessarily in breach of this Code. But no suggestion should be made that drinking is appropriate while doing it or that success at this activity is enhanced by drinking.

Donations or activities to support programmes that encourage social responsibility or discourage underage drinking are not in breach of this Code.

## EXPERIENTIAL AND EVENTS

Each of our brands has its individual characteristics. However, from time to time, people will want to taste different drinks and discover new brands.

Tastings or sampling activity is defined as the unconditional giving away of product to the public in a public place, including licensed premises.

Anyone carrying out sampling must comply with local licensing laws. All employees and third parties should be trained in responsible serving and must be of LPA.

Anyone conducting tastings must encourage responsible consumption and discourage activities that reward excessive drinking. When conducting events, we must recognise sensible drinking guidelines and not offer alcohol that exceeds these recommendations to any one person.

Tastings must not promote drinking in conjunction with irresponsible behaviour or involve activities that have speed incentives or require excessive quantities to be consumed quickly.

Some alcohol can be drunk 'straight' i.e. undiluted with other ingredients. This is not the same as a 'shot'. Care must be taken to avoid encouraging rapid consumption or 'downing in one'.

Safeguards should be put in place to avoid tastings being undertaken by individuals under the LPA or by those driving or operating machinery.

When promoting our brands at events, we must be responsible, respectful and consistent with the ethics, image and values of our company.

Event staff, whether Edrington employees or outside contractors, are our company ambassadors. They must emulate and promote our brand values, so should be briefed accordingly.

Guidance on dress code must be provided by the global and local marketing teams. This guidance should outline the rationale behind it. However, brands need to ensure this does not isolate any individual group.

How staff are dressed can set the tone of an event. Attendees should feel comfortable approaching staff – it is important that our staff feel they are not seen to be there for purely aesthetic reasons.

The following basic principles apply:

- The dress code should respect different cultures, lifestyles and traditions, while ensuring that consistently high standards are applied;
- Clothing should not overshadow the brand or event. It should respect the brand, the cultural environment and the person wearing it;
- A recognisable, consistent image of the Edrington brand should be used across all markets. An image can, of course, be altered according to the local culture or climate;

A close-up photograph of a person's hands holding a snifter glass filled with whisky. The glass has the Highland Park logo and name on it. The background is blurred, showing other people and glasses in a social setting.

## EXPERIENTIAL AND EVENTS (CONTINUED)

- Clothing should reflect the values of the brand (and Edrington) but also those of the target audience;
- Women should not be restricted to wearing dresses or skirts. Trousers and flat shoes should be provided as an option;
- If a staff member is not dressed according to event guidelines, additional appropriate clothing should be offered. Those not dressed according to this Code and guidance should not undertake any role.

## GENDER

We are committed to reflecting a modern, equal society. As such, all marketing activity will be conducted in line with our ethics and values around gender so that we can deliver responsible, effective and creative marketing.

It is the responsibility of our marketing teams to be aware of the progressive landscape around gender and ensure roles within marketing activity should not be stereotypical or defined by gender and be fair and representative. It is crucial that we display authenticity and steer away from tokenism in all gender issues. We cannot assume women want and need exactly the same as men. Equality is the goal, but equity is the means to get there.

The following must be adhered to when carrying out marketing activity at a global and local level:

- Events:
  - All staff must be multi-skilled and able to apply their skills to all requirements, regardless of gender;
  - Roles must not be stereotypical and defined by gender.
- Agency:
  - Ensure women are represented on the project both within the agency and Edrington side and are involved in the decision-making process throughout.
- Creative development:
  - Do not compare female and male bodies to objects, particularly consumable objects and particularly our product;
  - Include women and men in appropriate clothing for the activities they are doing.
- Issue of constraint:
  - Ensure women check creative (ads / social media) to ensure balanced approach;
  - Roles must not be stereotypical and defined by gender and candidates should be appointed based on merit and experience.
- Consumer research:
  - Ensure we have female representation in qualitative studies closely aligned to consumer / population profiling data where possible;
  - Ensure we have a fair and represented sample aligned to consumer / population data where possible when conducting quantitative work.

## GENDER (CONTINUED)



The following must be considered at both a global and local level when carrying out marketing activity:

- Creative development:
  - Where appropriate, include women in lead roles, regardless of who the creative is targeting when two or more people are featured;
  - Where appropriate, allow women an equal voice when two or more people are featured in creative;
  - Where appropriate, do not exclude women from protagonist roles or include roles as only supporting or side-kick characters when two or more people are featured in creative;
- Where appropriate, ensure there is fair representation and equal balance of both genders when two or more people are featured in creative;
- For production teams (ads / social media), where possible, ensure there is fair and equal representation of both male and female producers / directors provided on the short list prior to appointing the role. All candidates should be considered for the role based on their merit and experience.

## LICENSING

We must not license our brands for the following:

- Children's clothing, accessories, books, games, toys, sports equipment, dolls, action figures or materials targeted towards anyone under age;
- Apparel or items carrying messages which might encourage rapid drinking, drinking and driving, drinking to excess, drunkenness, violence, anti-social behaviour or inappropriate sexual behaviour;
- Confectionary, unless it's clearly intended for adults;
- Food products that appeal to anyone under age;
- Sexual or drug-related merchandise;
- Items such as guns and knives or anything that might be considered a weapon (except tools, culinary items or adult sports equipment);

A copy of this Code should be provided to all prospective licensees and a commitment obtained that they will comply with it.

All licensing arrangements must have prior approval from Edrington Legal and the Brand Director.



## COMPLIANCE



The brand director, senior regional leader, or any member of the board or executive committee has responsibility for ensuring compliance with this Code.

External consultants such as PR, marketing or advertising agencies should be supplied with this Code and aware of the principles and provisions of it.

Edrington's business partners, such as joint-venture companies and third party distributors, should also be supplied with this Code. All marketing on behalf of Edrington or our brands should comply with this Code.

In addition to this Code, we also take account of national regulations such as The Portman Group in the UK ([portmangroup.org.uk](http://portmangroup.org.uk)), The British Code of Advertising, Sales Promotion and Direct Marketing ([asa.org.uk](http://asa.org.uk)) and OFCOM's rules of broadcast advertising ([ofcom.org.uk](http://ofcom.org.uk)). In Europe, and the USA we take account of the European Forum for Responsible Drinking (EFRD) and DISCUS respectively.

Where a national code does not exist, or local regulations do not protect the principles of this Code, local distribution companies should follow the principles of this Code as far as possible.

## MARKETING CODE COMMITTEE

The Marketing Code Committee is appointed by Edrington's Chief Executive and chaired by one of our non-executive directors (currently Alice Avis). Each member of the Committee has one vote. Edrington employees with an interest in a complaint should recuse themselves from the relevant review.

The Committee meets once annually to review all materials issued in the previous year and the results are communicated to our Board of Directors and Brand

Directors. In addition to this, the Committee will meet to hear any complaints formally reported to the Corporate Affairs Director.

An annual independent audit of all brand marketing activity is conducted and is reported to the Marketing Code Committee each year.

## MARKETING CODE SUB-COMMITTEE

A sub-committee of the Marketing Code Committee exists and must be used by brand teams seeking guidance on any specific areas of concern with regards to major marketing campaigns and their potential for non-compliance with this Code. Major campaigns would be defined as assets that will be used multiple times, most likely across multiple markets, against which there has been significant investment in creation process. Referrals to the sub-committee should be made timeously, allowing for due consideration by the sub-committee and (to the extent possible) prior to incurring any material obligations or costs, via the Corporate Affairs Director (contact details below).

Referrals should include:

- a copy of the campaign content to be reviewed;
- a summary of the concern in relation to this Code; and
- a statement supporting compliance with this Code

This should be done in parallel to securing external pre-approval clearance, where such bodies exist. In the UK, for broadcast advertising, the established body is [www.clearcast.co.uk](http://www.clearcast.co.uk).

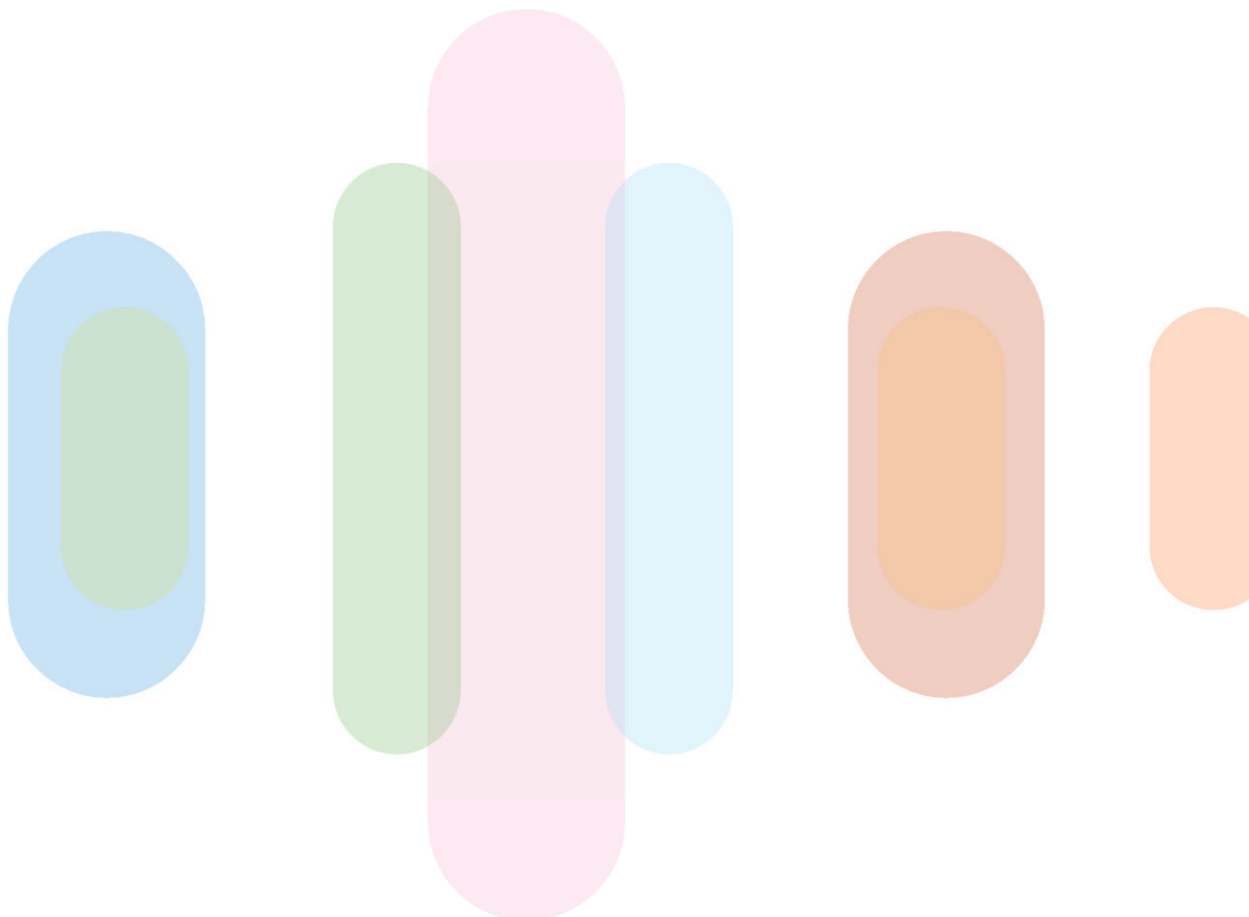
The sub-committee will endeavour to provide its guidance and recommendations within five business days of receipt of any referral.

## COMPLAINTS AND QUERIES

If you have any complaints regarding this Code or adherence to it, or wish to make a referral to the sub-committee, please contact:

**Lindsay McGarvie**  
Corporate Affairs Director  
[lindsay.mcgarvie@edrington.com](mailto:lindsay.mcgarvie@edrington.com)

**Edrington**  
100 Queen Street  
Glasgow  
G1 3DN



THE CODE OF CONDUCT AND ANTI-CORRUPTION AND SPEAKING UP POLICIES CAN BE FOUND ON THE EDRINGTON INTRANET UNDER "EDRINGTON CODES", IN THE EDRINGTON ACADEMY UNDER "CODE OF CONDUCT: OUR VALUES IN BUSINESS" AND ON THE EDRINGTON WEBSITE AT [WWW.EDRINGTON.COM](http://WWW.EDRINGTON.COM).

OTHER POLICIES REFERRED TO IN THE CODE CAN BE FOUND IN THE RELEVANT FUNCTIONAL AREAS OF THE EDRINGTON INTRANET.

PLEASE USE THE SEARCH FUNCTION PROVIDED FOR ASSISTANCE AS REQUIRED.



Edrington Codes