

# DIAGEO



## OUR COMMITMENT

The continued evolution of digital technologies provides Diageo with new and exciting opportunities to engage our consumers. Taking advantage of digital and social media effectively and responsibly will help us to protect our license to operate and to achieve our performance ambition to be the most trusted and respected consumer goods company in the world. The Diageo Digital Code provides the principles, framework and guidance to underpin these aims. It supports our approach to innovative marketing and the entrepreneurial spirit of our marketers, while at the same time ensuring we uphold our commitment to market responsibly to our adult consumers.

This version of the Digital Code incorporates all the requirements by the CEO Commitments for digital marketing, and I need to ask you and each of our business partners who support us in delivering our marketing executions, to own the it and the principles it embodies. This is a key requirement and fundamental to our values. If you need guidance to do this or have any concerns on the application of the Digital Code to your role and responsibilities speak to your Diageo lead marketer in your market. We have to get each execution right every time. Our brands deserve it and our consumers expect nothing less.

**Syl Saller**

**Chief Marketing Officer, Diageo plc**

## SCOPE

This code applies to all of our marketing and sales activities. For scope of application to Diageo employees and our business partners see section "Compliance with Our Digital Code". These include, but are not limited to:

Applications

(*e.g.*, mobile phone, social media, desktop applications)

Blogs

Instant Messaging

Location-Based Services

Microblogs (*e.g.*, Twitter)

Mobile Communications (WAP sites, advertising on mobile devices)

Mobile Messaging (*e.g.*, SMS, MMS)

Online Advertising/banner ads

Gaming (*e.g.*, Internet gaming, mobile games, in-game advertisements)

Online retail sites

Photo and Video Sharing sites, forums and blogs

(*e.g.*, Flickr, Instagram,)

Podcasts

POS/Event-based digital experiences

Relationship Marketing

(*e.g.*, email, member-get-member campaigns)

RSS feeds

Search Engine Marketing and Optimization

Social Media and Social Networking

(*e.g.*, Facebook, Twitter, Pinterest, Instagram)

## GUIDANCE

### PRINCIPLE 1

#### Laws, codes and policies

All content and marketing related activities must comply with the Diageo Code of Business Conduct and other relevant Diageo policies, in addition to all applicable laws and regulations.

## PREVENTING UNDERAGE ACCESS

### PRINCIPLE 2

#### Age Affirmation

Marketing communications must be aimed at adults only and never target those who are under the legal purchase age (LPA) for alcohol.

Age affirmation is a process or a mechanism by which the consumer provides their full date of birth (day / month / year) and country of access to affirm they are of LPA for that country.

Methods to affirm that consumers are LPA+ include an age affirmation website page or 'gateway', checks against a third party LPA+ registered user database, or an email or instant message.

All brand websites, games, widgets and applications for download must include age affirmation, unless they are placed on a site that already operates age affirmation for its users.

### PRINCIPLE 3

#### Media placement

Marketing communications must be placed only in media where at least 70% of the audience is over the LPA. Communications on a brand-controlled channel

that involved direct interaction with a user should require prior age affirmation, whenever possible.

Placement refers to the digital media channels where we may place our branded content. This includes, but is not limited to:

- A brand-owned website or mobile channel.
- Third party digital channels (e.g. advertising on third party websites or social media channels).
- A hybrid site fully or partially funded or sponsored by Diageo (e.g. brand Facebook pages).

Where local benchmarks for media placement are higher than our 70% requirements, then those higher benchmarks apply, e.g. 71.6% in the US or 75% in Great Britain and Ireland.

#### SOCIAL MEDIA

Communications on a brand-controlled channel that involved direct interaction with a user should require prior age affirmation, whenever possible.

The following conditions must be met when placing content in social media channels that provide no age affirmation mechanism (e.g. Instagram, Tumblr):

- At least 70% of the social media channel's audience is over the LPA (71.6% in the US, 75% in the UK)
- An age-disclaimer should be placed on brand accounts / pages reminding users that the content is intended only for users over the LPA.
- The UGC on the site monitored and moderated according to the DMC

## PRINCIPLE 4

### Content designed to be shared by consumers

All content that is designed to be shared by users should include instructions that the recipients should not forward the content to individuals below LPA.

If there is content which is designed to be forwarded on (e.g. emails, applications for sharing, virals), or shared by, consumers, we should include a Forward Advice Notice (FAN) to the individual who has downloaded the content making clear that no content should be forwarded to, or shared with, any individuals below LPA (e.g. *Please do not share this email to those who are under 21, Please do not forward this email those who are under the legal purchase age for alcohol*).

## CONTENT AND MODERATION

Content means all content of whatever nature including, without limitation, text, musical, pictorial, photographic, graphic, audiovisual works, sound recordings, text-software, interactive features and user-generated content (UGC).

All content (i) must comply with the Diageo Marketing Code (ii) is subject (except for UGC) to the DMC sign-off process (iii) is subject to the Digital Code review and sign-off.

## PRINCIPLE 5

### User-Generated Content (UGC)

User generated content on sites Diageo owned or controlled sites, as well as Diageo pages on third party sites, should be moderated and appropriately governed according to the Diageo Marketing Code (DMC) and all applicable laws and regulations.

User-generated content (UGC) is material, e.g. text, video, photography, provided by consumers or other

individuals in social network sites, brand websites, photo or video sharing websites, blogs, message boards.

UGC that appears on a third party digital forum over which Diageo has no editorial control is outside of the scope of this code, even if it apparently serves to promote a Diageo brand.

## PRINCIPLE 6

### Transparency

We must be transparent about our identity in marketing communications and a promoter or spokesperson must fully disclose any association with Diageo, so that consumers are left in no doubt as to that association.

We should be transparent in our marketing communications and disclose the communicator's true identity and association with Diageo when promoting our brands or communicating about them, so that consumers are left in no doubt as to that association.

## PRIVACY AND CONSENT

## PRINCIPLE 7

### Consent-based direct digital relationship marketing

Our digital relationship marketing activities direct with consumers are based on permission.

## PERSONAL DATA

We must be responsible when handling the personal information of consumers in our advertising or marketing activities and strive to be transparent about our activities that involve personal data and give consumers choice and control over the personal data that we collect from them.

## **PRINCIPLE 8**

### **We must comply with all applicable privacy regulations**

All personal data collected or otherwise used by us or on our behalf must comply with all applicable data protection and privacy regulations, as well as Diageo's own policies.

## **PRINCIPLE 9**

### **Protecting our intellectual property**

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

## **PRINCIPLE 10**

### **Information Security**

We must adopt adequate technical and organisational safeguards to protect the integrity of our channels, whether Diageo or third party controlled, their contents and the privacy of our consumers.