

DIAGEO

DIGITAL CODE



WHO DOES THIS APPLY TO?

- All Diageo employees.
- All subsidiaries of Diageo.
- Joint ventures in which Diageo has a controlling interest.
- Third party contractors, agents or consultants representing or acting for or on behalf of Diageo.
- Third party distributors who are responsible for or are involved in the marketing activities and marketing of our brands



OUR COMMITMENT

The continued evolution of digital media and 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 best performing, most trusted and respected consumer goods company in the world.

Syl Saller

Chief Marketing Officer, Diageo plc

CONTEXT

The Diageo Digital Code provides the principles and guidance to underpin these aims. It supports our approach to progressive, effective 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 every business partner who support us, to own 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 email DigitalCompliance@diageo.com. We have to get our execution right every time. Our brands deserve it and our consumers expect nothing less.

SCOPE:

This code applies to all of our marketing and sales activities:

Websites (including microsites)

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

Cookies, pixels and other online consumer personal identifiers
Internet Protocol (or IP) addresses and other online consumer personal identifiers

Search Engine Marketing and Optimisation

Social Media and Social Networking (e.g. Facebook, Twitter, Pinterest, Instagram)

Digital Advertising, e.g. Video ads, banner ads

Instant Messaging

Location-Based Services

Blogs and microblogs (e.g. Twitter)

Mobile Communications (WAP sites, advertising on mobile devices)

Mobile Messaging (e.g. SMS, MMS)

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

Direct Marketing (e.g. email, member-get-member campaigns)

RSS feeds

TABLE OF CONTENTS

WHO DOES THIS APPLY TO? 2

OUR COMMITMENT 2

CONTEXT 2

SCOPE..... 2

CORE PRINCIPLES 2

CORE PRINCIPLES OF THIS POLICY 3

GUIDANCE 3

PRINCIPLE 1 3

 Laws, codes and policies 3

PREVENTING UNDERAGE ACCESS 4

PRINCIPLE 2 4

 Targeting Adults..... 4

PRINCIPLE 3 5

 Media placement..... 5

 SOCIAL MEDIA CONTENT 5

PRINCIPLE 4 6

 Content designed to be shared by consumers 6

CONTENT AND MODERATION 6

 LINKS TO THIRD PARTY SITES 6

PRINCIPLE 5 7

 User-Generated Content (UGC) 7

PRINCIPLE 6 7

 Transparency 7

PRIVACY AND CONSENT 8

 PERSONAL INFORMATION..... 8

PRINCIPLE 7 8

 Consent-based direct marketing 8

 “OPT-IN” CONSENT 8

 PRIVACY AND COOKIE NOTICE 8

 UNSUBSCRIBE INSTRUCTIONS..... 8

PRINCIPLE 8 9

 We must comply with all applicable privacy regulations 9

 PRIVACY BY DESIGN..... 9

 EIGHT DATA PROTECTION PRINCIPLES..... 9

PRINCIPLE 9 10

 Protecting our intellectual property 10

PRINCIPLE 10 13

 Information Security..... 13

Responsible Consumer Research in Digital Media	13
CONSUMER INSIGHT STUDIES.....	13
SOCIAL LISTENING	13
CAMPAIGN REPORTING AND ANALYSIS.....	14
Standard Mandatories	14
COMPLIANCE WITH THE DIGITAL CODE	14
REVIEW AND APPROVALS	14
TRAINING.....	15
CONTROLS	15

CORE PRINCIPLES

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.
- 2 Targeting Adults - Marketing communications must be aimed at adults only, never target those younger than the legal purchase age (LPA) for alcohol, and be International Alliance of Responsible Drinking ([IARD](#)) compliant
- 3 Media Placement - Marketing communications must be placed only in media where at least 70% of the audience is over the LPA.
- 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.
- 5 User generated content (UGC) – UGC on 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.
- 6 Transparency - We must be transparent about our identity in marketing communications and a promoter, influencer or spokesperson must fully disclose any association with Diageo so that consumers are left in no doubt as to that association.
- 7 Content-based Direct Marketing - We only operate consent-based direct marketing, e.g. email, text, mail, and provide consumers with an easy method of unsubscribing from our marketing communications.
- 8 We must comply with a 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 including Diageo's website Privacy and Cookie Notice.
- 9 Protecting our intellectual property We must protect our brands and intellectual property rights and avoid infringing the rights of others.
- 10 Information Security - We should adopt adequate technical and organisational safeguards to protect the integrity of our channels and data, whether Diageo or third party controlled, their contents and the privacy of our consumers.

CORE PRINCIPLES OF THIS POLICY

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

Targeting Adults

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

We will use a range of available technologies, such as age affirmation, to target adult audiences in all digital media (including all brand websites, brand social media pages, games, widgets and applications for download) and to restrict access to those younger than LPA. 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.

Where possible we should look to supplement age affirmation with additional positive or negative targeting, including interest based, to add further accuracy. This is particularly important if targeting a narrow age group only just above the LPA+ threshold.

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.

Age affirmation pages must include Terms and Conditions of Use, a Privacy & Cookie Notice and a responsible drinking reminder (RDR), including a link to DRINKiQ.com as tabs / links whenever possible.

To ensure that effective age affirmation processes are put in place, you should follow the **Age Affirmation Requirements** (See Appendix for Supporting Document).

Marketing communications must be placed only in media where at least 70% of the audience is over the

LPA. 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 the United Kingdom and Ireland. Please consult your Diageo legal counsel for more information.

To build additional accuracy into our approach to Targeting Adults, we should employ, wherever possible, all reasonable data & targeting options and not rely solely on a site's age demographics. This can include, but is not limited to, the use of user login data as well as interest based positive or negative targeting.

IARD Compliance Requirements

- All social media pages must include; an Age Gate; a Forward Advice Notice 'FAN'; a Responsible Drinking Message; Community Guidelines or 'UGC Policy'; Transparency (e.g. blue tick verification or 'Official Account' wording).
- All websites must include; an Age Gate; a Forward Advice Notice 'FAN'; a Responsible Drinking Message; Community Guidelines or 'UGC Policy'; Transparency (e.g. Terms and Conditions, Privacy Policy etc.)
- All apps must include; an Age Gate; a Responsible Drinking Message; Transparency (e.g. Terms and Conditions, Privacy Policy etc.)
(See Appendix for Supporting Document)

See Principle 3 below for further guidance on targeting adults.

PRINCIPLE 3

Media placement

Marketing communications must be placed only in media where at least 70% of the audience is over the LPA.

Diageo's approach to digital media means working with partners who are part of our 'Trusted Marketplace' (TMP), as identified at either a global or local level. These media owners commit to meet a range of requirements, including adhering to the DMC and Digital Code. More details on the Trusted Marketplace can be found in separate documentation (See Appendix for Supporting Documents).

Media 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).

To identify whether a particular third-party channel is suitable for alcohol marketing, independent sources must be consulted.

A media agency should be used to identify third party channels that meet our TMP guidelines for the placement of our content. The media agency, or whoever is buying the media, must collect evidence of audience composition from the media owner to support the placement decision and a media plan for creative agencies who will deal with placement of the content. The records of media placements in digital must be kept, so the data is available for audit purposes.

Strict Brand Safety Protection

We must take every step possible to ensure our advertising content appears only in brand safe environments. This means avoiding adjacency both to standard brand safety issues (e.g. low quality, adult, violent or illegal content) as well as DM Diageo/alcohol specific considerations (e.g. alcohol misuse, pregnancy).

Content should only appear on whitelisted channels, either entire 'Trusted Marketplace Platforms' or, where appropriate, white lists of specific channels and sub domains. Global Digital Compliance or Local Market Partners should be consulted regarding placement options allowed for TMP Partners.

A negative keyword list must always be applied to further ensure avoidance of placement against unsuitable content.

All of the above brand safety practices, as well as the LPA+ targeting measures noted in the previous section, should be part of standard practice followed by agencies as well as market teams.

On occasion, Diageo may need to pause spend with specific media vendors where there is an identified risk. In these instances, all marketers are expected to respect the pause.

To ensure the correct steps are followed, refer to the **Diageo Trusted Marketplace Brand Safety Measures** (See Appendix for Supporting Documents).

SOCIAL MEDIA CONTENT

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

- Must conform to the Global Mandatory Social Media Guidelines.
- At least 70% of the social media channel's audience is over the LPA (71.6% in the US, 75% in the UK and Ireland).
- An age-disclaimer, a responsible drinking message and a link to DRINKIQ.com 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 and the UGC moderation guidelines (see Principle 5. for details).

Every age-validation methodology available to each individual platform must be used. See Appendix for Supporting Documents.

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).

- All videos must include a FAN on the last frame, together with other mandatorys (Responsible drinking reminder, trademark statements).
- All social media accounts should include a FAN on the platform, clearly stating that the content should not be forwarded to anyone under LPA in the country of viewing.

The FAN does not have to be included in social media conversations, e.g. individual Twitter or Instagram posts.

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 and any applicable laws and regulations (ii) is subject (except for UGC) to the DMC sign-off process (iii) is subject to the Digital Code review and sign-off.

LINKS TO THIRD PARTY SITES

Placement of content on third party channels must be in accordance with that channel's terms of use.

It must be clear that the link goes to a third party channel, and there must be no attempt to disguise the ownership of linked-to content.

Links must be text unless the appropriate trademark or copyright holder has given express or implicit permission (including through the use of social sharing functionality) for the use of images, graphics or logos.

Links must not imply endorsement of our brands, or sponsorship, association or any other connection, unless covered by an appropriate agreement.

In the case of a third party objecting to a link, the link must be removed as soon as possible, and within three working days of the objection being received.

When a third party places a link on a Diageo channel (e.g. one of our brands' Facebook walls) without prior invitation or permission, the link and its source must be managed according to our UGC guidelines.

scope of this code, even if it apparently serves to promote a Diageo brand.

UGC submitted to online or mobile websites, pages or applications managed by or on behalf of Diageo or third party sites over which Diageo has editorial control must be monitored at least once every working day and moderated according to the DMC, applicable laws, the third party Acceptable Usage Policy and the **UGC Guidelines** (See Appendix for Supporting Documents).

We must obtain consent for all UGC in accordance with the Global Mandatory Social Media Guidelines (See Appendix).

Where Diageo has control over the content, users must accept the brand site, or Social Network Site equivalent Terms and Conditions and where possible our Privacy & Cookie Notice before using a UGC mechanic or posting content on our brand websites or pages.

PRINCIPLE 5

User-Generated Content (UGC)

User generated content on 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

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. Diageo employees and representatives must disclose their association with Diageo and must not pretend to

be a consumer or an ordinary member of the public when creating buzz about our brands. We should not encourage consumer brand ambassadors who perform promotional activity in return for a reward or incentive to deliberately disguise or conceal their relationship with Diageo in a way that is likely to make others think they are acting spontaneously.

PRIVACY AND CONSENT

PERSONAL INFORMATION

What is Personal data? Information relating to a consumer who can be identified from that data. Under certain local regulations (e.g. the GDPR in Europe) this may include a unique code or reference or even an IP address, geographic location, machine ID, data collected by a cookie or pixel, as well as contact details.

We must be responsible when handling the personal information of consumers in our advertising and marketing activities and always transparent about our activities that involve personal data and give consumers choice and control over the personal data that we collect from them. 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 including Diageo's website Privacy and Cookie Notice.

We respect our consumers' right not to be contacted and we do not sell our consumer personal information to third parties unless our consumers agree to this, or if the personal information is appropriately anonymised. We only share consumer data with third parties when we have entered into a contract or agreement that establishes their obligations concerning Diageo consumer data.

PRINCIPLE 7

Consent-based direct marketing

Our direct marketing activities with consumers are based on permission.

"OPT-IN" CONSENT

Obtain consent from consumers via a positive 'opt-in' mechanism before sending direct digital marketing communications.

PRIVACY AND COOKIE NOTICE

A Diageo approved Privacy & Cookie Notice must be used to supplement, and not replace, the user opt-in consent and should be present for download on all Diageo owned and controlled sites. Engage with your Diageo legal counsel if this is not possible.

UNSUBSCRIBE INSTRUCTIONS

Provide consumers with an easy method of unsubscribing from our marketing communications. Marketing communications delivered to consumers via e-mail must include an unsubscribe link in every message.

For guidance on collecting personal data, opt-in requirements, Privacy and Cookie Notice and unsubscribe instructions see the Consumer Data Compliance Checklist (See Appendix for Supporting Documents).

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.

PRIVACY BY DESIGN

The concept of Privacy By Design involves designing an approach to processing personal information at the outset that ensures you maximise your opportunities to use the data you collect in the ways in which you want to, whilst ensuring appropriate safeguards to protect consumer personal information.

If you are planning any high-risk or innovative activities with consumer data (e.g. Custom Audiences, Big Data, Apps, Internet of Things, Online Behavioural Advertising, Geolocation, Profiling), you should consult the Diageo legal counsel who will advise if a Privacy Impact Assessment is needed. . During a Privacy Impact Assessment we will assess your project to ensure that it complies with the eight principles set out below.

EIGHT DATA PROTECTION PRINCIPLES

Personal data which we hold or have access to must only be used for Diageo business purposes and we must adhere to the following **Eight Data Protection Principles to ensure** it is:

1. Lawfulness, fairness and transparency

Personal Data must be fairly and lawfully collected and managed (be transparent; use appropriate opt-in language and Privacy & Cookie Notice; do not use the data in ways that have adverse effects on the individuals concerned);

2. Purpose

Processed only for limited or stated purposes (be clear about the purpose; only use data in way which is compatible with the specified purposes);

3. Minimisation

Adequate, relevant and not excessive (only collect and use the data that is actually needed);

4. Accuracy

Kept accurate and up-to-date (take reasonable steps to ensure that inaccurate data is erased or rectified without delay; record the source of the data; consider whether updates to the data may be needed);

5. Disposal

Not held for longer than is necessary (delete/anonymise/suppress data securely once it is no longer needed for its original purpose; do not keep data indefinitely – apply retention schedules);

6. Consumer Rights

Processed in line with an individual's rights (establish clear internal processes for responding promptly to requests from individuals concerning their personal data (such as requests to opt-out of direct marketing, to have access to personal data, or to have personal data updated or deleted and within any regulatory timeframes that are applicable in your market);

7. Security

Safeguarded through both technical and organisational measures in place throughout its lifecycle (see Principle 10 below) by applying our Information Security policies and guidelines, including Information Classification & Handling Guidelines on handling of consumer data. All consumer data should be encrypted at rest, in storage, and be encrypted in transit. Organisational measures should include contracts with data processors and access controls; and

8. Data Export

Not transferred to other countries without adequate protection (check with Diageo's legal counsel whether restrictions on consumer data export apply before allowing transfer of consumer data outside the country of collection e.g. an overseas vendor or cloud storage).

For further guidance please see the Data Privacy Global Policy and the "Best practice sample checklist for

processing personal data" on the final page of the **Data Privacy Global Policy**.

PRINCIPLE 9

Protecting our intellectual property

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

Our marketing must NOT:

- Subject to the Global Mandatory Social Media Guidelines (see Appendix for Supporting Documents), use any UGC (e.g. comments, profile pictures, etc.) in any marketing materials or communications (including on any Diageo website) without approval from Legal.
- Disclose any confidential or commercially sensitive information including details of Diageo, brand or third party supplier financial performance, business strategy, intellectual property, innovation plans, trade secrets or current legal proceedings.
- Post third party materials without their express or implicit consent. We must follow online etiquette and link to the source where it is possible to do so.

Other legal requirements:

- We must not issue public invitations to private parties in a public forum on social network sites controlled by Diageo. Instead private methods of communications such as email or notifications with links directing consumers away from the site and to a registration mechanism must be used instead.
- Instruct retailers to post their information such as location, events or promotions in a public forum on social network sites controlled by Diageo. It is acceptable to display this

information only if the retailers choose to place it independently.

- Use corporate mail gateway for sending marketing communications to consumers. The 'reply to' address for email campaigns must not point to the Diageo corporate mail gateway. Instead an external mail gateway must be created, e.g. something@talktosmirnoff.com

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.

Accredited agencies must be used to design and develop all Diageo digital assets and all Internet websites must be developed, hosted and tested in line with Information Security guidelines (see Appendix for Supporting Documents).

All POS terminals and eCommerce websites, microsites, applications and must be **PCI DSS compliant** (see Appendix for Supporting Documents).

All new high-risk or novel activities or campaigns that will undergo a Privacy Impact Assessment pursuant to Principle 8, above, should also undergo an information security review.

All consumer data should be encrypted at rest, in storage, and be encrypted in transit. Any security breaches, including websites or social handles fraudulently purporting to be Diageo, brand or key executives, phishing, social media threats, website defacement, should be reported to csi@diageo.com, (see Appendix for Supporting Documents).

Responsible Consumer Research in Digital Media

There is a range of research tools and approaches available to track consumer conversations and online behaviour in social media (sometimes referred to as 'Social Media Listening and Intelligence' tools). All types of studies that enable us to identify what is being said, by whom, how frequently and where it is happening are still consumer research.

All Social Media Listening and Intelligence tools must be Diageo approved by Digital Compliance (digitalcompliance@diageo.com). These research tools often involve interaction with consumer personal data (as defined in the Privacy & Consent section above) which may give rise to concerns around privacy. Always take time to understand and check carefully the process to track and gather data – you may need consumer

explicit consent in some markets where you are interacting with consumers. Make sure your agency or other service provider takes contractual responsibility for data privacy risks related to the service they are offering us (they may be processing personal information and sharing findings with us on an anonymised or aggregated basis, but the risk related to the original touch point with the consumer may remain with us as the buyer of the service which makes us a data "controller") and ensure they have received appropriate training and/or have a data privacy officer. See the data privacy principles above.

Diageo commissions three broad types of consumer research in the digital area. These categories and the rules for each are outlined below:

CONSUMER INSIGHT STUDIES

All consumer insight studies commissioned or conducted by or on behalf of Diageo must be compliant with the Responsible Research Standard and specifically our commitment to (i) commission or conduct research only among consumers LPA+; and (ii) ensure all participants in Diageo research are screened to ensure they are LPA+.

For social media, including consumer insight studies where there are no geographic boundaries, we can only conduct consumer research among consumers 21+ for all studies, regardless of the market in which they are conducted or commissioned. We must be able to verify that all participants are 21+ before proceeding.

SOCIAL LISTENING

Social listening research offers tools to track sentiment (favourability and message penetration) enabling us to protect brand and corporate reputation and respond appropriately to publically available information about Diageo, our brands and our competitors.

All social listening studies for brand and corporate reputation purposes should be agreed with local Corporate Relations, reviewed by your market lawyer, and handled by recognised social listening agencies. Social listening findings must not be used for future marketing campaigns and product innovation projects, unless they are verified through a 100% LPA+ consumer research.

CAMPAIGN REPORTING AND ANALYSIS

Aggregated data that is not personal information may be used to report on the performance of a brand and/or campaign and for the purpose of identifying scale and response to brand push messages in media. All information collected needs to be sourced from channels that meet the media placement principle on age – 70% LPA+ placement requirements - and should not consist of new trend sourcing using verbatim comments. Tracking positive versus negative sentiment (% split) for terms is acceptable provided PII is not involved and so long as the search criteria complies with the DMC.

- Platform data (such as Google Insights, Google Trends) and other publically available information and tools can be used to plan media spend for keywords and volume. All search criteria must comply with the DMC and all search findings intended for use in development of future marketing campaigns and product innovation projects must be verified through a 100% LPA+ research.
- Aggregate performance data (clicks / engagement metrics) may be used to optimize spend and/or creative .Aggregate data (non-PII, non-verbatim) may be used to report on and analyse effectiveness of communications, for example # of Tweets using @[Brand], #[Campaign Tag], product or campaign mentions.

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

Standard Mandatories

All Diageo-owned digital assets (e.g. websites, microsites, competition sites, apps etc.) must be hosted on a Diageo Digital Compliance approved platform.

A link to the Diageo general website Terms and Conditions and Privacy & Cookie Notice (see Digital Code supporting documents for Website terms and conditions) must be displayed on every page of every site, on every online forum and be linked to from any Diageo brand social page

Promotions, competitions, petitions and online sales require additional terms and conditions. Users must

expressly accept these additional terms as part of the online process.

A link to Privacy & Cookie Notice “Privacy & Cookies” must be included on every page of every website, including gateway (see Digital Code supporting documents for Privacy & Cookies). The display of the Terms and Conditions and Privacy & Cookie Notice must be printer-friendly and should not interrupt user experience.

A link to DRINKiQ must be embedded on every Diageo controlled site, including social network sites.

A responsible drinking reminder must be included in all marketing communications. Where appropriate local markets may display additional links to Social Aspects Organisations (SAOs), such as www.drinkaware.com in GB or www.centurycouncil.org in the US.

For further information in relation to relation to accessibility to our online channels please refer to the **Diageo Accessibility Guidelines** (See Appendix for Supporting Documents).

COMPLIANCE WITH THE DIGITAL CODE

Compliance with our Digital Code is mandatory for all employees of Diageo, our subsidiaries and joint ventures where Diageo has a controlling interest. It also applies to third party agencies, contractors and consultants engaged by, representing or acting for (or on behalf of) Diageo, and our third party distributors who are responsible for or are involved in the marketing activities and marketing of our brands. We must follow all the provisions in this Code and should never cause, authorise or overlook breaches of the Code by others.

REVIEW AND APPROVALS

- Digital Code sign-off is required for all marketing materials and activities, in every market in which they are run. Activities and materials previously signed off in another in-market company or global brand team must be reviewed and signed off locally before the materials are released in a different territory.
- Marketing directors are accountable for ensuring that their teams follow an effective Digital Code sign-off process to ensure that all materials in their territories fully comply with the letter and the spirit of the code.

- Diageo’s online approval tool, Diageo Content Hub (D©H), must be used to facilitate Digital Code of Practice review and retention of approvals.
- If escalation is needed following a non-decision or disagreement relating to a Digital Code issue, the decision must be escalated in the following manner (depending where the stalemate originates):
 - In-market Marketing Director, Corporate Relations Director and Legal Counsel.
 - If not resolved then the issue should be escalated to Global Marketing Director and the Digital Policy & Governance group. If not resolved at this level, the Chief Marketing Officer makes the ultimate decision.

TRAINING

- Our in-market companies and global brand teams must establish regular training programmes for all those involved in Digital Marketing.

CONTROLS

- Digital Code sign-off and compliance processes must be formally reviewed on an annual basis in every in-market company and global brand team.
- In case of a breach, an additional review should be undertaken immediately.

Any criticism of Diageo’s marketing activities must be reported immediately to the in-market Corporate Relations Director, Legal Counsel and Marketing Director, and the Global Head of Responsible Marketing and Innovation, in order to review the material in question, take remedial action if necessary, and ensure our commitment to responsible marketing and self-regulation is maintained.

Any breach of the Digital Code is also considered to be a breach of the Code of Business Conduct and should be reported promptly through the routes described in the Code. Any material suspected to be in breach of the

Digital Code will be reviewed and any breaches will be dealt with in accordance with the Diageo internal investigations policy and local disciplinary policies, as permitted by law.

You can also raise concerns with your line manager, local Controls, Compliance & Ethics Manager (CC&E Manager), Global Risk & Compliance, or make a confidential report using SpeakUp.

For further information on the Diageo Digital Code or any digital compliance issues, please contact the Diageo Digital Compliance team at DigitalCompliance@diageo.com.

Appendix

The supporting documents for the Digital Code can be downloaded from the following resources:

Diageo Mosaic – Compliance and Ethics / Policies, Standards & Guidance

Diageo Content Hub (D©H) – Global Documents / Diageo Marketing Code / Digital Code

<https://diageocontenthub.com>