

HEINEKEN

OUR RESPONSIBLE MARKETING CODE

MARCH 2026

CONTENT

03
LETTER

04
INTRODUCTION AND PURPOSE

07
PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

08
PRINCIPLE 2: RESPONSIBLE DRINKING

09
PRINCIPLE 3: ADULT APPEAL

11
PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

12
PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

13
PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

14
PRINCIPLE 7: CONSUMER CHOICE

15
PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

17
SPECIFIC GUIDANCE: DIGITAL MEDIA

19
SPECIFIC GUIDANCE: SPONSORSHIPS AND PROMOTIONS



RESPONSIBLE MARKETING CODE

Everyone at HEINEKEN plays an important role in how our brands are communicated. As we write our next chapter, we care deeply that our messaging places responsibility front and centre as key pillars of our Brew a Better World 2030 strategy. We have updated our Responsible Marketing Code (the "Code") to reflect this.

We believe the current Code represents industry best practice and demonstrates our unwavering commitment to respectful, truthful and responsible marketing aimed at adults. We take great pride in the creativity and ingenuity of the thousands of talented people who make and bring our brands to market every day and know that this Code will inspire a new generation of world-class advertising.

As a company, we must work to ensure everyone trusts our brands and enjoys our products responsibly. That is why we must embed the integrity of the Code not just into our communications, but also into the very essence of our HEINEKEN culture. We can only strive for future success if we combine our expertise and passion with the commitment to take our corporate responsibility and brand values seriously.

Thank you.

March 2026

Bram Westenbrink
Chief Commercial Officer

Joanna Price
Chief Corporate Affairs Officer

Ernst van de Weert
General Counsel

INTRODUCTION AND PURPOSE

The HEINEKEN Responsible Marketing Code (the “Code”) presents a set of principles that governs all our commercial communications. It’s intended to support our core beliefs that the moderate consumption of alcohol can be part of a balanced lifestyle, that responsible drinking is not only cool, but aspirational and that truthful, compliant and respectful marketing is the HEINEKEN way.

The Code reflects our Brew a Better World strategy and the HEINEKEN Values: Passion for consumers and customers, Courage to dream and pioneer, Care for people and the planet, and Enjoyment of life. These values have grounded us as from 1864 onwards and are the foundation for our future success.

Every 12-18 months we take a fresh look at these principles to ensure that the Code is relevant and keeping pace with the ever-changing environment in which we work. This updated Code replaces the previous version of the Responsible Marketing Code, with effect from March 2026. It provides more specific guidance on functional claims as well as sponsorships. We have also added or updated relevant HEINEKEN policies in order to ensure a cohesive approach to our corporate principles.

Millions of consumers drink our products and while most do so responsibly, we know that some do not. Irresponsible drinking is bad for our consumers and therefore bad for our company. This Code helps make certain that our commercial communications adhere to the highest standards of responsible marketing, making responsible drinking aspirational and demonstrating truthfulness and respect in all our activations.



SCOPE

The Code applies as follows to all HEINEKEN owned products and products produced under licence by HEINEKEN Operating Companies.

The Code does not apply to corporate non-commercial, non-branded communication specifically addressing social responsibility issues such as underage drinking, drink driving and excessive drinking.

	ALCOHOL BRANDS	NON-ALCOHOLIC VARIANTS OF ALCOHOL BRANDS (E.G. HEINEKEN 0.0)	NON-ALCOHOL BEVERAGES WITHOUT ALCOHOL MOTHER BRAND (E.G. FAYROUZ)
THE CODE APPLIES?	Yes	**Yes.** See Principle 7 on Consumer Choice for further guidance.	**No**
EXEMPTIONS?	No	**The following provisions are exempt:** ★ Provisions 2.4 and 2.6 - Responsible drinking messages and symbols are not required.	**The following Principles and provisions do apply:** ★ Principle 1 – Respectful, Transparent and Truthful with the exception of a QR code leading to alcohol and health information. ★ Principle 8 – Respect for People and Planet ★ Provision 6.6 regarding stimulants applies.

GOVERNANCE

Compliance with the Code is mandatory. This is HEINEKEN's minimum standard policy for all external commercial communications. In localities where laws are stricter, they supersede our code.

Everyone involved in the marketing and sale of our brands including third party licensees such as joint ventures, and third-party distributors, is responsible for implementing the Code, including for the brands of our subsidiaries and joint ventures where we have a controlling interest. For joint ventures where we do not have a controlling interest, we educate them on the Code and encourage its adoption for their own brands.
To ensure effective compliance, the following actions are required:

- All Commerce, Corporate Affairs and Legal teams, marketing agencies and others involved in marketing and selling our brands, and all new hires shall complete annual training on this Code.
- All agreements related to commercial communication should refer to the Code and a copy of it should be attached to all contracts with parties that prepare, make or post commercial communications on our behalf.
- Both Legal and Corporate Affairs should be involved as early as possible in any creative discussion about marketing or commercial communication to provide timely guidance and should continue to be involved if new questions arise along the way.
- We take complaints about our commercial communications seriously. All complaints received from non-governmental organisations, consumers or regulatory bodies about a particular commercial communication, activity, or event, must be properly addressed and related correspondence stored and registered for audit purposes.

RESPONSIBILITY

- The Marketing Director is accountable for the training of the agencies they work with and for compliance with the Code within the full marketing team.
- The Sales Director is accountable for training the agencies with whom they work. They are responsible for ensuring Code compliance for all non-frontline sales and trade marketing employees that work on marketing, and with external agencies.
- The Global Brand Directors are responsible for any marketing or sales activities agreed on a regional or global level – for instance an agreement with a regional supermarket chain or a sponsorship deal for a global event.

APPROVALS

- Any issues related to the sign-off process, additional guidance or potential departures from the Code should first go through Legal and Corporate Affairs and, if they believe it's required, will be escalated to Global. Written approval is then needed from the relevant Global Marketing Director before any activity gets underway. In case this does not resolve the dispute, the issue will be presented to the Chief Commercial Officer, Chief Corporate Affairs and General Counsel at Global for a final decision.

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

Our HEINEKEN values are all about enjoyment of life, respect for the individual, society and the environment. Bringing these values to life means communicating in a respectful, transparent and truthful manner in all of our brand activities.

1.1 As a socially responsible company, we communicate transparently and truthfully about our products, and social and environmental impact.

1.2 We comply with both the letter and spirit of all applicable laws, regulations and industry codes, which include advertising, consumer protection, privacy rights, food and labelling laws and intellectual property laws (trademark, copyright, design and portrait rights) as applicable. We also comply with those self-regulatory codes to which we are a signatory.

1.3 Any claims that we make about our products should be compliant with all applicable laws, fact-based and substantiated by sufficient scientific evidence, and should not be misleading or exaggerated.

1.4 All consumer facing packaging must include full nutrition and ingredient information as well as a QR code to access science-based information on alcohol and health in accordance with the HEINEKEN Global Labelling Policy.

1.5 All branded content should be distributed in a way that does not conceal the identity or origin of the brand. Whenever our employees or agency partners or influencers participate in discussions, online or offline, they should identify themselves and never pose as a consumer supporting our brands or disparage competitors.

1.6 In consultation with Legal, we always protect our brands with trademarks, and make sure we are or become the owner of the copyrights to our advertising and other third party generated content. We avoid infringing the intellectual property rights of other parties, ensure we do not mimic the visual identity of other brands and pre-clear any use of third-party brands and other protected third-party assets, in our advertising.

1.7 When we use or collect personal consumer data for commercial communications via digital media, we will comply with all (European Union and other) applicable privacy laws, including all required technical and operational measures to safeguard the collected personal consumer data. This includes asking for consumer consent and arranging for the possibility to opt-out.



ASK YOURSELF...

- ★ Did I check that the communication adheres to all applicable laws and regulations?
- ★ Is my communication clearly branded?
- ★ Would I be happy to publicly defend my commercial communication concept as respectful, compliant and truthful?
- ★ Is the communication true, fact based and not misleading?
- ★ If the communication includes personal data, have I checked that it complies with all applicable privacy laws?

ASSOCIATED CODES & GUIDANCE

IARD Guiding Principles for Self-Regulation of Marketing Communications for Beverage Alcohol
HEINEKEN Global Labelling Policy
HEINEKEN IP Information (p29) in the Code for Business Conduct

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 2: RESPONSIBLE DRINKING

At HEINEKEN we are focused on making life more enjoyable through the responsible promotion of our brands. The key is creating positive experiences by encouraging our consumers to enjoy our products in moderation. We never encourage consumers to drink large amounts or exceed their limits.

2.1 We promote moderate drinking in all our commercial communications and show that moderation is cool and aspirational. We never portray or associate our brands with drunkenness or excessive drinking. We ensure that portion sizes are appropriate to the setting portrayed.

2.2 We never make alcohol content or product strength the main theme of our commercial communications of our alcohol brands, with the exception of non-alcoholic beverages.

2.3 We provide a clear, relevant and applicable responsible drinking message in all our commercial communications.

2.4 We require everyone that does commercial communications for alcohol brands on our behalf, such as influencers, to include a responsible drinking message and/or to direct consumers, where appropriate, to reliable third-party online resources that discourage alcohol misuse.

2.5 All HEINEKEN owned and controlled digital media will be monitored for content as consumers might post about irresponsible drinking. If we see it, we act on it, by removing the content and/or responding to it.

2.6 All consumer facing packaging of alcohol brands will include symbols to remind consumers: (a) of the local legal purchasing age; (b) not to drink while pregnant; and (c) not to drink and drive, all in accordance with the HEINEKEN Global Labelling Policy.

2.7 We clearly represent ABV (alcohol by volume) of our products on packaging and signage.

2.8 Every HEINEKEN Operating Company selling Heineken® beer shall dedicate 15% of Heineken® media spend toward the promotion of Heineken 0.0.



ASK YOURSELF...

- ★ Did I include a responsible drinking message on my marketing material?
- ★ Am I depicting or implying excessive drinking in my communication?
- ★ Am I representing moderate drinking as aspirational?

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 3: ADULT APPEAL

Our intended audience for all HEINEKEN owned alcohol brands as well as for non-alcoholic variations of alcohol mother brands is adults (see table under Scope). We will actively restrict exposure to minors and will take care that our commercial communications appeal primarily to an adult audience. If local rules are stricter than our minimum standard, we adhere to the local standard. We also understand that styles, interests and trends constantly change. What appeals to minors today, might be different tomorrow, or might be different from one place to the next.

CONTENT

3.1 We promote our brands to persons above the legal purchasing age (LPA+). In countries where there is no LPA, we will not target our brands to anyone under 18 years of age. For the purposes of the Code, anyone below the LPA or under 18 is a minor.

3.2 Our commercial communications must never be designed in a way that appeals primarily to people under the LPA. “Appeal primarily to” means having a specific appeal to minors above and beyond the general appeal it has for adults.

3.3 We ensure any person featured in our commercial communications is and appears to be over 25 years of age.

3.4 Any characters aged between LPA and 25 years of age may appear in public relations, event promotions or sponsored activities only if these are non-paid, non-scripted, non-rehearsed appearances, but they may not appear in our advertising.

3.5 We will not feature in our commercial communication any imagery, styles, behaviours, music, characters (real or fictitious), cartoon characters, athletes, celebrities or influencers, games or gaming equipment that appeal primarily to minors.

3.6 We will not permit our brand logos or trademarks to be licensed for use on merchandise that has primary appeal to minors, such as toys, children’s clothing, games or gaming equipment that have a primary appeal to minors.

Principle 3 continues on the next page →



TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 3: ADULT APPEAL

PLACEMENT

3.7 Our commercial communications will only be placed in media where we can reasonably be assured based on data collected as per provision 3.9, that 70% of the audience will be over the LPA (73.6% in the US and 75% in the UK, Ireland and the Netherlands) (the "70/30 rule"). Check local audiences and check if stricter rules apply beyond those listed here.

3.8 We regularly evaluate audience composition to ensure we are meeting the 70/30 rule. If a channel fails to meet the threshold of the 70/30 rule for three consecutive months, our content must be removed until the threshold is met again. Annual placement audits are conducted to ensure compliance and inform improvements in our placements.

3.9 In digital spaces, we use an age-affirmation tool where possible to ensure we are reaching adults of LPA. Where age-affirmation tools do not exist, we use the 70/30 rule on a country-by-country basis and provide a statement that affirms access for adults only. Where possible, we use interest-based factors as evidence to minimise underage appeal, as well as self-declared age data.

3.10 We do not sponsor or promote activities or promotional events if minors are reasonably expected to make up more than 30% of the audience in accordance with the 70/30 rule.

3.11 We do not promote our brands near schools or community centres or other establishments frequented primarily by minors.

3.12 We will not conduct or commission market or consumer research among people younger than the LPA.

Refer to Digital Media in the Specific Guidance section for additional information around digital activations.



ASK YOURSELF...

- Even though the celebrity in my commercial communication is 25 years or older, do they also look at least 25?
- Is the language in my commercial communications the sort of language that I would expect to hear or read from an adult?
- Do I feel comfortable that I have taken every appropriate action to minimise the chance that a minor is exposed to my message?

ASSOCIATED CODES & GUIDANCE

ICC Framework for Responsible Alcohol Marketing Communications
IARD and WFA Standards for Online Alcohol Marketing Channels
IARD Global Standards for Online Alcohol Sales and Delivery
IARD Digital Guiding Principles
IARD Influencer Guiding Principles
ICC/ESOMAR International Code
Responsible Marketing Pact

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

We do not promote or depict binge or excessive drinking, drinking and driving, and drinking in situations that require mental or physical alertness.

4.1 We only promote and portray responsible and moderate drinking in safe and appropriate circumstances.

4.2 Specifically, we do not promote drinking alcohol in unsafe situations such as operating machinery, drinking while engaged in sports, any activity in or on the water such as swimming, boating or surfing, riding (e.g., horses, skateboarding etc.) or in any other situation that is hazardous or requires mental or physical alertness.

4.3 We do not associate our alcohol brands with drinking and driving, with the exception of motorsport sponsorships that need prior approval of Global Commerce, Corporate Affairs and Legal. Our marketing partnerships with motor sports, such as Formula 1, focus exclusively on responsible drinking messaging (e.g., don't drink and drive) and promoting non-alcoholic brands. Any other vehicle branding is prohibited unless operated by professionals for their business.

4.4 We carefully monitor our social channels to ensure the content is not encouraging or promoting dangerous or illegal activities.

4.5 Marketing communications must not portray or encourage gambling behaviour that could lead to financial, social or emotional harm. Particular care and consideration of local sensitivities must be taken into consideration when assessing whether to associate our brands with gambling.
Still unsure? Speak to your local Corporate Affairs or Legal teams for guidance.

4.6 Our brands are not present at events, sponsorships or venues where violence or aggressive behaviour might be present or is commonly associated with such behaviour.



ASK YOURSELF...

- Is my activation or sponsorship free from any direct or symbolic links to violent, anti-social or aggressive behaviour?
- Am I comfortable defending the branded activity as safe?
- If the commercial communication concept was real, would everyone featured be safe from harm, both for themselves and others?
- Is the activation free of any associations of drinking while engaged in sport, riding or water-based activities?

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

While alcohol forms part of the social life in many cultures and plays a rich and positive role in society, we need to take care in how we represent those social environments to never imply that drinking enhances social or sexual success.

5.1 We present our brands as complementing and reflecting good living, social accomplishments or good taste, rather than causing them.

5.2 We do not represent our brands as contributing to or enabling social success such as helping someone gain a promotion, wealth, friends, possessions, popularity or giving someone better mental or physical capabilities.

5.3 We never suggest our brands contribute to sexual success, nor do we display nudity, or what may be perceived as indecent, in our commercial communications.

5.4 We do not imply or suggest that our products can act as an aid to removing personal inhibitions.



ASK YOURSELF...

- ★ Is it clear that alcohol is not the cause of social or sexual success?
- ★ Would you feel comfortable watching the activation with your manager, parents and/or grandparents?

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

6.1 We do not promote, suggest or imply that our alcoholic beverages can prevent, treat or cure medical conditions, nor do we claim that drinking alcohol provides functional, health or dietary benefits. We do not give the impression that our alcoholic beverages can enhance mental ability or improve physical performance.

6.2 Nutritional claims for alcoholic beverages must be factual and can only relate to reduced alcohol content and calories. In some markets outside of Europe, claims about sugar or carbs may be allowed. Always consult your local Legal team.

6.3 For non-alcoholic beverages, claims about nutritional qualities, ingredients (including vitamins or minerals), or claims about health or functional benefits are allowed, as long as they are factual, accurate, and substantiated by evidence. Always consult Global Commerce, Corporate Affairs, and Global Legal in accordance with our internal Guidance for Functional Claims.

6.4 All our communications should promote a balanced lifestyle and encourage moderate, responsible drinking. Consumer packaging should include a QR code linking to science-based information on moderation, alcohol and health. Brand websites must also provide access to this information to support informed choices.

6.5 Our alcohol brands must never show or suggest pregnant women consuming non-alcoholic or alcoholic products.

6.6 Alcoholic drinks must not contain excessive stimulants. Non-alcoholic energy drinks must follow industry standards, with the Energy Drinks Europe Code of Practice applying as minimum standard. These drinks must not be marketed to minors, promoted for mixing with alcohol, or claim hydration benefits. Labels must clearly state caffeine content and include a warning to consume in moderation and “Not recommended for children or pregnant/breastfeeding women.” Any exceptions must be approved by Global Legal and Corporate Affairs.



ASK YOURSELF...

- Can I defend any functional claims in my marketing before a review board?
- Is my commercial communication for an alcoholic beverage free of any suggestion that the product has a functional benefit?

ASSOCIATED CODES & GUIDANCE

Energy Drinks Europe Code of Practise Energy Drinks Europe

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 7: CONSUMER CHOICE

Our commercial communication should always show that moderation is a positive aspect of responsible drinking and recognise that sometimes not drinking is the most responsible choice. HEINEKEN is committed to introducing new and innovative products to meet consumer needs. Non-alcoholic beverages contribute to expanding consumer choice and the growing cultural trend around the importance of responsible drinking and living a balanced lifestyle.

7.1 We never portray abstinence in a negative light. We understand that people choose to drink or not to drink alcohol for a variety of reasons, both short-term and long-term, and are always respectful of this choice in all our activities.

7.2 We take the opportunity to promote our non-alcoholic brands as alternative beverage choice and to promote responsibility. We may promote non-alcoholic beverages in situations when drinking alcohol is unsafe or inappropriate for example being a choice for drivers or during a business lunch.

7.3 We clearly distinguish between our alcoholic and non-alcoholic beverages, so consumers are clear on what they are drinking.

7.4 We always position any non-alcoholic variants of an alcohol brand as an adult drink, not intended for minors. Principle 3 on Adult Appeal applies to non-alcoholic beverages.

7.5 If a non-alcoholic beverage is not marketed under an alcohol variant (e.g., Maltina, Viva Malta and Fayrouz) then the Code does not apply (except for Principle 1, Principle 8 and provisions 6.7), and the brand should be marketed as a soft drink in accordance with local regulations and relevant industry codes.

7.6 Health, nutritional or functional claims related to non-alcoholic beverages can only be made in accordance with applicable laws and industry codes if backed-up by sufficient scientific evidence. We make sure these products can clearly be recognised as non-alcoholic.

7.7 When differentiating categories, we recognise that beer as a low ABV beverage, including its lower and non-alcoholic line extensions, can serve different consumption occasions, behaviours, and cultural roles. Communications may reflect these distinctions in a factual, responsible way.



ASK YOURSELF...

- Am I marketing my non-alcoholic variants in primarily adult venues or digital media?
- Have I included 0.0% in a way that is clearly visible?
- Is my non-alcoholic variant displayed in the adult beverage section of the retail outlet?

TABLE OF CONTENTS

PRINCIPLE 1: RESPECTFUL, TRANSPARENT AND TRUTHFUL

PRINCIPLE 2: RESPONSIBLE DRINKING

PRINCIPLE 3: ADULT APPEAL

PRINCIPLE 4: SAFE AND APPROPRIATE BEHAVIOURS

PRINCIPLE 5: SOCIAL AND SEXUAL SUCCESS

PRINCIPLE 6: HEALTH, NUTRITIONAL AND FUNCTIONAL CLAIMS

PRINCIPLE 7: CONSUMER CHOICE

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

DIGITAL MEDIA

SPONSORSHIPS AND PROMOTIONS

PRINCIPLE 8: RESPECT FOR PEOPLE AND PLANET

We are a global company, serving consumers with a wide range of different cultural and social backgrounds. We are sensitive to those differences so that we remain culturally and socially relevant and respectful. What or whom we choose to be associated with reflects our values and beliefs.

8.1 We take both a global and local perspective for our international brands, ensuring our messages will be relevant and understood in the context that we intended. We are sensitive to political views and socially sensitive topics and are mindful these can change over time.

8.2 We are extremely careful about how we market and what we sponsor, and avoid anything that could be considered unlawful, dangerous, violent, inappropriate, in poor taste or disrespectful of the subsets of societies and cultures in which we operate. We regularly review our commercial communications against both cultural and social trends and our attitudes towards what is acceptable.

8.3 We are respectful of gender and diversity. We avoid the use of stereotypes and portray the characters and individuals that appear in our commercial communications positively, sensitively and with decency. We do so regardless of their gender, race, disability, nationality, sexual orientation, religion, age or political views.

8.4 We show respect for people, the environment and animal welfare.

8.5 Any claims we make about the environment in our marketing should be compliant with all applicable laws, truthful and evidence based.

8.6 We require all consumer facing packaging to include recycling information. We also encourage environmentally sustainable behaviour in our commercial communications.



ASK YOURSELF...

- ★ Is my activation or sponsorship free from any direct or symbolic links to violent, anti-social or aggressive behaviour?
- ★ Are there no inappropriate stereotypes in my communication?
- ★ Could my activity be considered greenwashing?

ASSOCIATED CODES & GUIDANCE

HEINEKEN Inclusion & Diversity Information
Brew a Better World
HEINEKEN Global Labelling Policy
HEINEKEN Green Claims Policy



SPECIFIC GUIDANCE

The following sections provide more guidance on specific types and channels of marketing and should be read in conjunction with the 8 Principles in this Code.

DIGITAL MEDIA

All commercial communications in the digital space, paid or unpaid, where the content of those communications is under our control, must adhere to all Principles in the Code. In addition, the following actions are required:

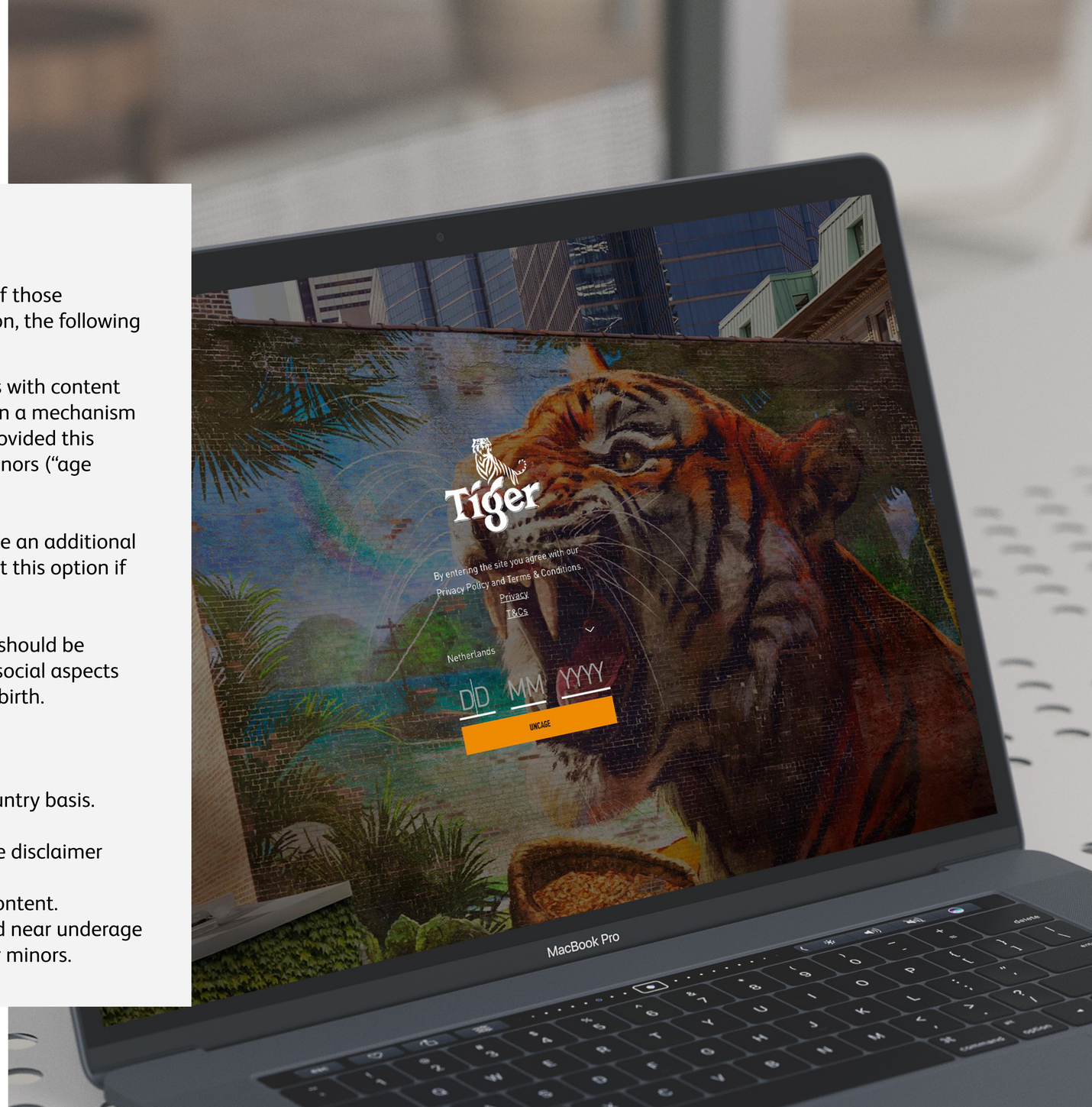
- ★ In line with Principle 3, our digital marketing communications must not target minors with content or placement. All digital media used in our commercial communication should contain a mechanism by which a user is required to provide their full date-of-birth (year, month and day) provided this complies with local legislation and country of residence to affirm that they are not minors (“age affirmation mechanism”).

- ★ If the age affirmation page also uses a “remember me” option, then we should include an additional notice on the age affirmation page asking the user whether it is appropriate to accept this option if the computer is shared with other users below LPA.

- ★ Whenever a user’s access is denied through an age affirmation mechanism, this user should be sent an appropriate message and/or be redirected to an appropriate alcohol-related social aspects website. Users should not be able to easily back click and re-enter a different date-of-birth.

- ★ In case the digital platform does not provide an age affirmation mechanism we will:

  - Follow the 70/30 rule for audience composition, where possible on a country-by-country basis.
  - Ensure a thorough check of platform demographics by local agencies.
  - Assess any other data or interest-based factors to determine appeal, include an age disclaimer reminding users that the content is intended for users above the LPA only.
  - Ensure the platform provides a mechanism to remove or moderate inappropriate content.
  - A brand safety list should be developed to prevent brand content from being placed near underage content, such as youth-oriented programmes or content, or educational content for minors.



DIGITAL MEDIA

- When a digital media channel, app or platform uses the 70/30 rule only, ensure that a statement is placed reminding users that the content is intended for adults only. Please also strive to obtain an objective (i.e., not channel owned) data source to support the compliance with the 70/30 rule when using the channel or platform and ensure that the data is locally relevant. When no such data are available and no evidence of a predominantly adult audience can be construed otherwise, avoid communicating on that platform.

- Whenever HEINEKEN's controlled digital platforms have the functionality to allow content sharing, we will include a forward advice notice on the platform, clearly stating that the content should not be forward to anyone under the LPA.

- Our commercial communication is only intended for specific countries or geographies and geo-blocking is mandatory.

- All HEINEKEN's commercial communications' websites should include a clearly visible responsible drinking message.

- All user generated content that is placed on sites or platforms controlled by HEINEKEN should be moderated on a regular and frequent basis and, if inappropriate, removed as quickly as possible and no later than 72 hours. This includes communications by third parties hired by HEINEKEN – such as influencers – on third party platforms. The Code does not apply to user-generated content that is place on websites or platforms over which HEINEKEN has no control.

- Always use brand-controlled accounts when engaging in online conversations on behalf of the brand. It should be clear that the page or website belongs to the brand either by means of the 'blue tick' or by including text that is the official profile of the brand.

- When deciding whether to market our products in games, gaming platforms or the Metaverse, consider the context of the platform as well as its accessibility to minors and thoroughly assess their various features against our values. When our commercial communications take place in the Metaverse, make sure the age of guests will be verified – for example, by using a bouncer checking IDs.



ASSOCIATED CODES & GUIDANCE

IARD Digital Guiding Principles Resources: How to Implement Safeguards on Platforms

IARD and WFA Standards for Online Alcohol Marketing Channels

HEINEKEN Consumer Data Principles

SPONSORSHIPS AND PROMOTIONS

SPONSORSHIPS

- In principle, we can sponsor events, teams, clubs and individuals as Ambassadors.
- For activation, only engage Ambassadors based on agreement of specific services. A contract must be in place to ensure Ambassadors agree to comply with the principles of the RMC (over 25) and have a plan in place to terminate contract if necessary.
- Do not place branding on players engaged in active sports (not branding them while in play).
- Comply with all relevant provisions of the Code – social success, excessive consumption, safe behaviour, etc.
- Undertake to offer non- and low-alcoholic beverages at sponsorship events.
- All activation must include a clear responsible drinking message.
- We do not sponsor or promote activities or promotional events if minors are reasonably expected to make up more than 30% of the audience.
- The above is not applicable for non-alcoholic beverages without an alcohol mother brand (such as certain malt drinks or energy drinks).
- If in doubt, please consult Global Legal & Corporate teams for approval.

ATHLETES

- Athletes below 25 years of age may not feature in any commercial communications. Athletes above LPA but below 25 years old may only be used for public relations, event promotions or sponsored activities if these are non-paid, non-scripted and non-rehearsed appearances.

- We will not employ any athlete regardless of age whose audience is primarily (more than 30%) composed of minors.

ASSOCIATED CODES AND GUIDANCE

- IARD's Global Standards for Influencer marketing

INFLUENCERS

An influencer is an individual whom we recruit to influence potential consumers of our brands by promoting or recommending them on social media. They are therefore part of our commercial communications, and all provisions of the Code apply to their content. In addition, the following provisions apply:

- Influencers must use age affirmation mechanisms on digital platforms to prevent exposure to minors.

- On platforms where it is not possible to use an age affirmation mechanism effectively, influencers must be over 25 years old and appeal primarily to adult audiences in accordance with the 70/30 rule.

- We will not engage influencers who are known to have associations with harmful drinking or whose reputation or known behaviour could harm our reputation. We will check the background and content of all paid influencers to make sure they are Code compliant.

- Influencers must clearly and unambiguously disclose their relationship to our brands in any message or promotional material posted on our behalf.

- All posts by influencers must contain the required legal notices or the "Enjoy Responsibly" message.

- Influencers' posts must be closely monitored by us, and they must remove posts when requested.

- Influencers need to sign an agreement that includes compliance with the Code.

SPONSORSHIPS AND PROMOTIONS

PROMOTIONS

- All consumer and trade promotions, on- and off-premise, will encourage moderate drinking. We will not use drinking games that encourage rapid or excessive drinking nor employ any drink delivery device (e.g. funnels, hose and pipe) that prevents consumers from controlling how much alcohol they are consuming.
- We will never require someone to drink our brands in order to enter a competition.
- In addition, we will offer low or non-alcoholic alternatives where possible during our promotions.
- We will only allow sampling of our brands if allowed by local laws to persons of LPA.

ASSOCIATED CODES AND GUIDANCE

- HEINEKEN Brand Promoters Policy Age Gate - THC | The HEINEKEN Company

COMPETITIONS

- Always consult Legal when running a competition, regardless of prize size, especially if it involves retaining personal data.

BRAND PROMOTERS

- Brand promoters play a key role promoting our brand portfolio to customers and consumers at point of sale and at events throughout the global HEINEKEN business. Brand promoters can be employed directly by HEINEKEN or through an agency or distributor on our behalf. Brand promoters will always be treated with respect and dignity.
- We will ensure that our brand promoters can always do their work safely. This includes all aspects of their roles: working times, place, transport, uniform, incentives, tasks and behaviour. We will not employ brand promoters if we cannot meet the required conditions for their safety.
- We will ensure that our brand promoters do not promote drinking games or mechanisms that encourage irresponsible drinking.
- We will ensure that brand promoters and agencies are trained on how to recognise and flag anti-social behaviour, especially at events or sampling opportunities.
- We will provide copies of the Code with any contract with employers of brand promoters and explain they as well as their employers are required to comply with its provisions. Employers are required to train their brand promoters appropriately.



HEINEKEN

For further information on the HEINEKEN Responsible Marketing Code or compliance issues, contact the relevant HEINEKEN OpCo. Advice is also available from GCU@Heineken.com