



# **Code for Commercial Communications**

**October 2015**

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**PERNOD RICARD** has adopted this provision as its own internal Code for Commercial Communications which will apply to all its advertising around the world.

All **PERNOD RICARD** marketing teams and agency partners must comply with this Code for Commercial Communications. At the same time, individual affiliates must ensure that our advertising is also in compliance with the relevant national laws or codes. In case of conflicts, the relevant national codes must be followed.

For any advice, guidance or implementation of this Code as well as submissions of campaigns for approval please contact the Responsible Marketing Panel (RMP) at [RMP@pernod-ricard.com](mailto:RMP@pernod-ricard.com)

## **PREAMBLE**

Alcohol beverages have been consumed and enjoyed around the world for centuries. Production of these alcohol beverages, consumption patterns and drinking habits differ widely from one country or region to another, and particularly with regard to the different categories of alcohol beverages. These products, when responsibly consumed, are compatible with a balanced and healthy lifestyle and are enjoyed in a responsible way by the vast majority of consumers.

## **PURPOSE OF THIS CODE FOR COMMERCIAL COMMUNICATIONS**

It is recognized that irresponsible consumption or inappropriate advertising of alcohol beverages may have negative personal, social or health consequences, or otherwise negative consequences for the industry. The purpose of this Code for Commercial Communications is to ensure that Pernod Ricard commercial communications do not encourage or condone irresponsible consumption or misuse of any kind, as well as inappropriate advertising of our products.

## **COMMERCIAL COMMUNICATIONS**

Commercial Communications are defined herein as: “All brand advertising or marketing communications to consumers regardless of the medium used (e.g. print, broadcast media, digital, labeling, packaging, internet, new technologies and sponsorship) and including consumer and trade promotion, merchandising and point of sale material.”

*Commercial Communications do not include:*

- Non-advertising materials or statements to the media, government agencies or the public about issues of societal concern such as the risks or benefits related to the consumption of alcohol beverages and educational messages about responsible drinking or the role of alcohol in society.

## BASIC PRINCIPLES

*Commercial Communications should:*

- be legal, decent, honest and truthful and conform to accepted principles of fair competition and good business practice;
- be prepared with a due sense of social responsibility and be based on principles of fairness and good faith; and
- not offend prevailing standards of taste and decency, be unethical or use degrading stereotypes or situations.

### Article 1. Misuse

1.1 Commercial Communications should not encourage or condone excessive or irresponsible consumption, nor present abstinence or moderation in any negative way.

1.2 Commercial Communications should not show people who appear to be drunk or in any way imply that drunkenness is acceptable.

1.3 Commercial Communications should not suggest any association with violent, aggressive, illegal, dangerous or antisocial behavior.

1.4 Commercial Communications should avoid any association with, acceptance of, or allusion to drug culture or illicit drugs.

1.5 For all print, TV, cinema and digital advertisements, a responsible drinking message (RDM) shall be included. The RDM must be clearly legible and noticeable on the advertisement. For digital media, the application of this rule is discussed further in the annexed digital guidelines. Unless technically not feasible, to ensure legibility and visibility the RDM shall:

- be prominent, horizontal and affixed in a clearly visible place
- be in a font and/or color which clearly contrasts with the background
- be of a height of letters equal to 1/100 of the overall sum of height and width of the advertisement if no other stricter minimum size is required by the industry or any local law or regulation. If the RDM consists of or includes a logo, it should be of an appropriate size to ensure legibility.

The RDM should be expressed in the language most easily understood by the target audience and adapted to local situations. In the EU, all print local advertisements and POS materials will, unless other local requirement, preferably include the website address of the self-regulation website for consumer information ([www.drinkaware.co.uk](http://www.drinkaware.co.uk), [www.responsibledrinking.eu](http://www.responsibledrinking.eu) [www.disfrutadeunconsumoresponsable.com](http://www.disfrutadeunconsumoresponsable.com) or [www.wineinmoderation.eu](http://www.wineinmoderation.eu) ). If this web address is self-speaking an additional RDM may be used, but is not mandatory on the advertisement.

1.6 As a signatory of the IARD (International Alliance for Responsible Drinking) [www.iard.org](http://www.iard.org) 5 commitments PERNOD RICARD will provide on all bottle labels, by the end of 2017 , a “consumer info website” about the risks of excessive or inappropriate drinking (as specified [in the attached pdf guidelines](#))

## Article 2. Minors

2.1 Commercial Communications should not be primarily aimed at minors, nor show minors consuming alcohol beverages.

2.2 Commercial Communications should only promote alcohol where at least 70 percent of the audience are reasonably expected to be adults of Legal Purchase Age or Legal Drinking Age (1) or older (e.g., print, broadcast, digital, events). They should not promote alcohol beverages where more than 30 percent of the audience is known or reasonably expected to be minors. In the U.S., the standard is 71.6 percent and 75 percent in UK, so if the communications can be seen by audiences in those countries, they must comply with the highest standard.

2.3 Commercial Communications should not use models and actors who are not at least 25 years of age.

2.4 Commercial Communications should not use objects, images, styles, symbols, colors, music and characters (either real or fictitious, including cartoon figures or celebrities such as sports heroes) of primary appeal to children or adolescents. (2)

2.5 Commercial Communications should not use brand identification such as names, logos, games, game equipment or other items of primary appeal to minors. .

*(1) For this Code, the Legal Purchase Age (LPA) or Legal Drinking Age (LDA) is the minimum age to buy or drink alcohol in the relevant local jurisdiction. Should no local LPA/LDA exist, or should a breakdown of the respective local LPA not be available; 18 years of age should be used.*

*(2) In the E.U, Pernod Ricard is a signatory of the [“Responsible Marketing Pact”](#) which contains as a best practice guidance a “black list” and a “road test” to ensure compliance with that commitment.*

## Article 3. Drinking and Driving

3.1 Commercial Communications should not suggest that the consumption of alcohol beverages is acceptable before or while driving motor vehicles or equipment of any kind, including but not limited to speed boats, jet-skis, snow-mobiles or airplanes.

3.2 Any association of our brands with motor sports must be managed in respect of principles defined by art 3.1

## Article 4. Hazardous Activities, Workplace & Recreation

Commercial Communications should not suggest that the consumption of alcohol beverages is acceptable before or while operating potentially dangerous machinery, or with undertaking any potentially hazardous recreational or work-related activity.

## Article 5. Health Aspects

5.1 Commercial Communications should not claim or imply that alcohol beverages may have therapeutic properties or that consumption may help prevent, treat or cure any human disease or illness.

5.2 Where permitted by law, Commercial Communications using truthful and accurate factual statements about carbohydrate, calories or other nutrient content may be appropriate in some circumstances.

#### **Article 6. Pregnancy**

6.1 Commercial Communications should not show a pregnant woman drinking or be aimed at pregnant women.

6.2 All **PERNOD RICARD** bottles shall include the pregnancy logo as specified [in the attached guidelines](#), unless otherwise prescribed by local laws.

#### **Article 7. Alcohol Content**

7.1 Commercial Communications should not create any confusion as to the nature or content of alcohol beverages.

7.2 Commercial Communications may present information for consumers on alcoholic content, but should not emphasize high alcoholic content as a dominant theme in any brand communications. However, messages may not imply or state that consuming alcohol beverages of low alcohol content will avoid abuse.

#### **Article 8. Performance**

Commercial Communications should not create the impression that consumption of alcohol beverages enhances mental ability or physical performance or has an energizing effect, e.g. when engaging in activities requiring concentration in order to be safely executed.

#### **Article 9. Social Success**

Commercial Communications should not suggest that the consumption of alcohol beverages is a requirement for social acceptance or success.

#### **Article 10. Sexual Success**

10.1 Under no circumstances should Commercial Communications, offend generally prevailing standards of taste and decency.

10.2 Commercial Communications should not suggest that the consumption of alcohol beverages enhances sexual capabilities, attractiveness or leads to sexual success.

## Article 11. Product Innovation

For all Brands, special care must be taken with “new products” and related marketing activities.

11.1 New products include entirely new to market, as well as existing product, innovations where a significant change in labeling, packaging or flavor is proposed.

11.2 New products and their related marketing activities should not be directed at or primarily appeal to minors or underage persons. New products and their related marketing activities should not be associated with the use of codes, terms, symbols or words associated with youth culture.

11.3 New products and related marketing activities should not imply or state that they should be consumed excessively.

11.4 New products and their related marketing activities should not lead to consumer confusion with non-alcoholic beverages. Branding and alcohol content should be indicated in a clear visible place and of an appropriate size to ensure legibility so it is reasonably clear that the product is a beverage alcohol product.

11.5 **PERNOD RICARD** should not produce any beverage alcohol product that contains excessive amounts of added stimulants (1) and should not market any beverage alcohol product or promote any beverage alcohol combination as delivering energizing or stimulating effects.

11.6 The Responsible Marketing Panel (RMP) shall in the first instance review compliance with the **PERNOD RICARD** Code for Commercial Communications. Such review should be supported by any marketing materials or brief that is reasonably necessary for the RMP to determine whether there is compliance. For example, the materials should at a minimum describe the manner in which the new product is planned to be marketed and promoted (the consumer insight, target group...)

*(1) No more than 200 mg/l of caffeine based on a consensus of research and regulatory information, as outlined in [the report Stimulants Added to Alcohol Beverages: Research Review and Discussion](#).*

## FURTHER GUIDANCE AND TRAINING ON THE IMPLEMENTATION OF THIS CODE FOR COMMERCIAL COMMUNICATIONS

If further advice is required on the understanding or interpretation of the provision of this Code for Commercial Communications, **PERNOD RICARD** employees should contact members of the RMP. All submissions of campaigns either for “confidential copy advice” or “formal approval” should be uploaded on the dedicated online address [RMP@pernod-ricard.com](mailto:RMP@pernod-ricard.com). Except in exceptional circumstances, a reply should be provided by the RMP within seven (7) business days.

To ensure the best implementation of the this Code, in addition of in-person trainings, marketing teams, legal, CSR, public affairs and communication teams should complete the “responsible marketing e-learning” provided by Pernod Ricard University and obtain their “certificate of achievement” <https://tas-pr.taleo.net>.

## COMPLIANCE WITH LAWS, REGULATIONS AND OTHER INDUSTRY CODES

All Commercial Communications must be in accordance with all local or national applicable laws, regulations and self-regulatory codes of practice.

## COMPLIANCE BY EXTERNAL CONSULTANTS

**PERNOD RICARD** marketing teams should ensure that external consultants such as advertising, marketing, social media, digital, public relations and sponsoring agencies, are aware of this Code and this guidance. To ensure this, they should receive training by local teams or complete the Pernod Ricard “responsible marketing e-learning” module [http://www.responsiblemarketingelearning.fr/xe1825FRzqh\\$WjkMn](http://www.responsiblemarketingelearning.fr/xe1825FRzqh$WjkMn).

## ANNEXES AND REFERENCES

The Code for Commercial Communications is further clarified and explained in the attached Annexes that include specific guidance:

- For Internet brand marketing activities (Annex1)
- For Point of Sales promotions (Annex 2)
- For Sponsorship (Annex 3)

## USEFUL LINKS

Link IARD

Main site: [www.iard.org](http://www.iard.org)

List of age regulations by country:

[The minimum legal age limits tables](#)

The Discus guidelines (U.S.) can be found at:

<http://www.discus.org/responsibility/code.asp>

E.U Common Standards on Commercial Communications can be found at:

<http://www.spirits.eu/files/upload/files/spiritsEUROPEguidelines.pdf>

[Responsible Marketing Pact link](#)





## **ANNEX 1 – Pernod Ricard Regulatory Guidelines for Digital Communications Activity**

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## OVERVIEW

Digital activity is a channel within **PERNOD RICARD**'s overall communications. As such it is included within the Code for Commercial Communications. However, there are a number of areas where the nature of the medium requires clearer guidance, which is why these guidelines have been developed.

There are a variety of guidelines available within the spirits industry regarding digital communications activity (for example, Discus, IARD, Responsible Marketing Pact for the EU). These tend to be geographically delineated but have a strong degree of overlap.

A lot of work on the internet is intended to be global in nature and even work intended for one particular market can usually be viewed elsewhere.

The **PERNOD RICARD** guidelines represent an attempt to distill the different guidelines into a common standard to be used by all **PERNOD RICARD** companies across all markets. Nonetheless those responsible for digital communications need to work with local markets to ensure that they comply with all relevant legal restrictions and regulatory guidelines. If there are any apparent contradictions between local regulations and these guidelines please check with Responsible Marketing Panel members.

There are three major areas where guidelines prevail and, for ease of reference and quicker initial delivery, each of these will be the subject of a separate guidelines paper:

- Ensuring a responsible approach is taken, particularly towards those below the legal drinking age
- Ensuring that email communications respect privacy and that all commercial communications are readily identifiable as such.
- Ensuring proper control of the Intellectual property issues connected with our use of digital media

## **PR digital guidelines paper 1: Ensuring a responsible approach is taken, particularly towards those below the legal drinking age**

Whenever alcohols marketing actively engage a user to interact with a brand, an age affirmation mechanism should be implemented before entry to check that this user is over LPA/LDA.

All websites operated by **PERNOD RICARD**, with the exception of those pertaining to corporate financial issues, must carry an age affirmation page (AAP sometimes referred to as LDA or LPA or AVP page). Precise details of what such a page includes can be seen in appendix A.

All websites and other brand owned or sponsored sites (eg Facebook pages, Twitter Feeds, Apps etc) should contain a Responsible Drinking Message (RDM). Detailed requirements for the RDM are shown in Appendix 1F. The RDM needs to be shown on both the AAP and the Home page of all brand websites.

Paid (and unpaid) for space and **PERNOD RICARD** produced editorial or commentary can only appear on sites where at least 70% of the audience is above LPA/LDA. Appendix B gives details of the process used to determine whether or not a site meets the required age profile. (Elsewhere in this document this rule is referred to as “the 70% rule”).

Any material designed for sharing, irrespective of where it is placed, must carry an appropriate warning that it should not be shared with anyone under the age at which it is legally permitted to purchase or drink alcohol in the country of viewing. This will be referred to throughout this document as a “download or sharing advice notice”.

Video footage that can be shared or downloaded must carry a beginning frame that carries an age warning “this material relates to the promotion of alcohol and should not be viewed by anyone below the legal age of alcohol purchase in the country of viewing” (please note that whenever TV commercials are put onto sites they should carry this frame irrespective of whether it is intended that they should be downloaded).

**PERNOD RICARD** teams should ensure that on social media all accounts, pages, channels and/or profiles identified as official ones.

Groups or channels that are run by **PERNOD RICARD** on third party websites (for example a Facebook Page or a YouTube channel) should wherever possible employ an age-gate mechanism. No group or channel should be run by **PERNOD RICARD** or its agents unless the site meets the 70% rule regarding audience profile. Nor should **PERNOD RICARD** engage with any group or channel that does not meet the 70% rule. Where it is not clear that 100% of the viewers are aged over LDA then a notice must be posted that the material shown is only intended for those over legal drinking age. Specific guidelines for some of the main channels are shown in appendix C.

User Generated Content may not be directly uploaded to any **PERNOD RICARD** owned or controlled website (or page) but must be reviewed before it appears (pre-moderated) or inappropriate content removed within a business day window in line with the guidelines given in appendix D.

All models or actors appearing on any PR controlled site or part thereof must be (and appear to be) over the age of 25

No images, including any User Generated Content, of anyone who is or appears to be below LPA/LDA and involved in drinking alcohol may be shown on any site (or part thereof) within **PERNOD RICARD**’s control.

All digital requirements and illustrated examples are summarized in a [“digital checklist”](#) and [Examples and Illustrations](#) that has to be applied and controlled by the marketing people developing brand activation on the Internet

## **Appendix 1 A – Age Affirmation Page details**

All first-time visitors to the brand site (or other location where an AAP is required) should be required to navigate an Age Affirmation Page (AAP) unless they are being referred from a website which itself is age-protected to a similarly rigorous standard. This includes traffic generated from pay per click search engines, natural search campaigns and displayed advertising campaigns.

The method of age affirmation should require the visitor to actively input their date of birth including day, month and year or, where possible, similar mechanism with same effect (Example: display the year field first and only the month in case the year is in conflict with LPA/LDA, and day only in case the month is in conflict with LPA/LDA). These should not be prefilled with example dates.

For online sales (e-commerce ) (where legal and based on all relevant legal restrictions and regulatory guidelines), web sites should carry a simplified Age Affirmation Page on the home page to check if the visitor is above LPA/LDA in the country. Users should however enter their full date of birth before the act of purchasing.

Users should be asked to select their country of location from a drop down list. Alternatively they may be asked to tick a box to confirm their country of location based on their IP address.

Access must then be blocked to any visitor below LPA/LDA. Blocked visitors should be given an appropriate message and/or directed to an appropriate alternative site (e.g. <http://www.drinkaware.co.uk/> , <http://acceptresponsibility.org/>). If they are not directed elsewhere they should not be able to easily back click and re-enter a different date of birth.

Visitors may be invited to set-up a “Remember me” option to facilitate easier access to the site in future. This invitation should be accompanied by a reminder to the visitor to consider the appropriateness of this option if the computer is shared with someone aged under legal purchase age. The storage of the birth date information recorded by the cookies must be time-limited. Since there are no global rules regarding the retention period, the maximum retention period of the information stored in the cookies must be determined in compliance with the applicable local legislation.

Direct electronic communications to registered members of LPA/LDA only may contain a link allowing direct entry to the site (i.e. by-passing the AAP).

AAP pages, like all website pages should carry Terms and Conditions and a Privacy policy.

All AAP pages must carry a prominent responsible drinking message and a link to a consumer information website on responsible drinking where available (in Europe this should be [www.responsibledrinking.eu](http://www.responsibledrinking.eu) and in the USA <http://responsibility.org/>). Further requirements regarding the RDM can be found in Appendix 1F

Visitors to the AAP may be below legal purchase [drinking] age and thus they may not be shown marketing messages. A minimal reference to the brand (for example a small product shot or logo is permitted).

Corporate websites, intended to communicate company information rather than to promote a particular brand(s), do not need to feature an age affirmation page. However if there are sections within these sites dedicated solely to brands then these sections should have an AAP.

## **Appendix 1 B – Checking site age profiles**

In determining whether a particular third-party website is a suitable vehicle for alcohol marketing, companies should refer to the following sources, in order of reliability:

- Syndicated data source – This should generally be seen as the most reliable evidence of a website’s audience profile. The most appropriate indicator is the most recent three months site average of available audience data of unique visitors (where seasonal fluctuations are evident the previous year’s data should also be taken into account, if available). Companies should be aware, however, that some syndicated sources do not cover all ages (for example, some suppliers’ data currently does not include individuals aged under-15). These sources should therefore be used with caution.
- Independent demographic survey - If a website is not measured by a syndicated data source, or the source does not provide convincing evidence of whether or not the 70% threshold has been met, companies should ask the website publisher to provide evidence of the age profile measured through an independent demographic survey.
- “Registered user” database – If neither of the above sources are available, or these data do not clearly demonstrate whether or not the 70% threshold has been met, but the website publisher operates a “registered user” database incorporating an age confirmation element, companies should use this as evidence of the likely age profile of overall visitors.

If a site does not meet the 70% threshold but operates a registered user database and has the ability to target users demographically with advertisements based on the date of birth they gave when registering, a company may place an advertisement as long as it is seen only by registered users of LPA/LDA.

In the event that none of the above is available, for example because it is a non-permanent (e.g. event-specific) website, a company should place marketing content only if either the website is age-protected to at least a similar standard as that expected of alcohol brand websites or it is entirely satisfied that the website unquestionably is targeting an adult audience and runs no risk of attracting a significant proportion of under LPA/LDA visitors following a review of:

- the (proposed) content of the website;
- comparable web sites;
- data provided by the publisher regarding the target audience;

- any other relevant factor.

## **Appendix 1 C – Detailed guidelines for some specific communication vehicles**

### **Applications (eg iPhone, Android etc)**

Where there is an age requirement included in the service (e.g iTunes has a 17+ option) the application must only be available in 21+ or closest to that. If there is no age requirement specified by the service or it is below 21+ then there must be an additional notice stating that the application should only be downloaded by those of 21 years or over.

Where access to an application is limited to a specific country then the age requirement may be the higher of LPA or 18 years.

If the service can prevent users who do not meet the age criteria from downloading the application then this should be enacted.

Applications must have an age affirmation in the app itself that shows the first time it is used. It does not need to be repeated each time the app is used.

Applications must have a responsible drinking message visible on the Welcome screen or the Home Screen (ideally with a link to responsible drinking content in your region or country as applicable). Detailed requirements can be found in Appendix 1F.

### **Blogs**

All PR blogs should be located on a site/platform that has an AAP.

PR or its agents should only make comments on blogs where there is a reasonable expectation that at least 70% of the audience is aged over LPA/LDA.

All PR blogs should carry a Responsible Drinking Message within the blog introduction. Detailed guidelines can be found in Appendix 1F

### **BlueTooth and similar near field technologies**

BlueTooth messaging or similar near fields technologies should link directly to an AAP unless it is being only used in areas where the audience is restricted to those of legal drinking age (e.g. Private events, Clubs and bars).

### **Instant Messaging**

PR and its agents may only Instant Message to recipients who are registered users of a specific club or group (eg Glenlivet guardians) and have already affirmed their age as a part of that registration and consent to receiving such communications.

### **Advertising on Mobile devices**

Third party mobile sites which are used for advertising must meet the 70% rule. Marketing material (e.g. sweepstakes) which is accessed via a mobile phone must carry an age affirmation page.

Direct messaging to mobile devices may only be undertaken to recipients who are confirmed that they are over the legal age of alcohol purchase (for example they may be part of a registered club) and consent to receiving such communications. Phone (device) registration data alone is not considered acceptable as in many cases a minor's phone is registered to their parent.

### **Gaming**

Advertising within third party games can only be run if the audience to the game can reasonably be shown to be within the 70% rule or sales of the game are restricted to over LPA/LDA. If you are intending to undertake this type of activity please speak to Responsible Marketing Panel members.

"Advergates" are permissible but the distribution of these games must be through websites that have AAP's and they must also contain a warning that they are intended only for those of LPA or above.

### **Podcasts**

Podcasts should carry a download advice notice and only be located on sites which have an age affirmation page.

### **QR codes**

(Quick response codes are two dimensional bar codes that when scanned or photographed link to a particular website).

Unless they are situated in age restricted areas (eg clubs or bars) or are accessed via an age affirmed website, QR codes should wherever possible link to material which carries an age affirmation page. QR codes should be accompanied by a notification that the content to be found is intended for those over LPA only.

### **POS/Event based digital experiences**

Should have age affirmation page unless they are in an area that is restricted to LPA (eg Clubs or bars) or controlled by a person. If controlled by a person they must ensure that anyone using the system is over the legal drinking age.

### **Relationship Marketing**

Relationship marketing can only be undertaken by registered users who in registering have affirmed that they are over LPA/LDA



### **RSS Feeds**

Really Simple Syndication feeds allow content to be taken into the users' aggregator (or reader). The link back to the content requires that the user goes through the original site's Age Affirmation Page (although the site may utilize "a remember me" feature).

### **Search Engine Marketing & optimization**

Search Engine links (eg Keywords) must direct users to the age affirmation page of the appropriate website.

### **Wiki's (eg Wikipedia, PBwiki)**

PERNOD RICARD should only participate in Wiki's which meet the 70% rule.

### **Social media sites**

#### **Twitter**

Advertising on Twitter is subject to the 70% rule.

Branded Twitter Feeds should be age gated. This is possible using Twitter Age Gate system (more info here: <https://support.twitter.com/articles/20169945>)

Branded Twitter feeds should carry a responsible drinking message within their introductions. This should be in the same font, color and size as the rest of the introductory text.

Twitter Feeds must contain a notice on their home page saying that the content is only intended for viewing by those over the legal age of purchase or drink in their country of residence or viewing (whichever is older).

#### **Facebook**

Facebook pages should be set up to only be available to anyone over legal age of purchase or drink. This can be achieved by selecting the "Alcohol Related" Age restriction in the Facebook page administration panel under the "Manage permissions" category. The page must also be categorized in the "Wine/Spirits" category. Additionally they should have a message on the page outlining that this page should not be read or accessed by anyone under legal purchase age. (Technically this should not be necessary as the page will only be visible to Facebook users over the appropriate age; however the message will make it clear to regulators that we are taking a responsible attitude to underage drinking).

**PERNOD RICARD** and its agents may provide material to individuals of LPA/ LDA to use on a blog or social media page that is directly related to a specific **PERNOD RICARD** Brand (for example a Facebook user Group entitled “Chivas Regal lovers”. where there is reasonable expectation that 70% of the audience is over LPA/ LDA. The content should be routinely monitored and the relationship terminated for failure to comply with this Code. Age affirmation may be required depending on the frequency of posts. Please consult the Responsible Marketing Panel. It is permissible for **PERNOD RICARD** to put material on a publicly available website (subject to age affirmation) that can be downloaded and reused on such blogs or social media pages provided that such material is accompanied by the appropriate download notices.

It is permissible for **PERNOD RICARD** and its agents to send material to bloggers and writers for use on more general sites (e.g “World of Whisky”) where there is no risk of confusion that such a site or blog may be belonging to, or be wholly sponsored by, **PERNOD RICARD**.

**PERNOD RICARD** and its agents may only communicate with other Facebook groups or individuals if they have good reason to believe that the audience to that site meets the 70% rule.

All user comments should be checked within one business day maximum and inappropriate material (see Appendix 1D) removed forthwith. In addition to manually monitoring all user comments, it is strongly recommended to put in place an automatic tracking of priority keywords including profanities and CSR terms to reply/moderate/remove non appropriate content. This should be part of the community management process setup with internal and/or external teams.

All **PERNOD RICARD** brand pages should include a RDM on the cover photo. A Responsibility tab that includes a “Responsible Drinking Pact” that sets out responsible behaviors to be followed by Facebook users when posting content (comment, photos, videos etc.) shall be added within the first 4 tabs in the top level Facebook page navigation under the cover photo (ie immediately visible) to all brand pages of **PERNOD RICARD**.

A Responsible Drinking Pact template for **PERNOD RICARD** is attached hereto as Appendix 1E. It is recommended to use this template. This template and the name of the document may nevertheless be adapted by brand companies and market companies in accordance with local customs and considerations.

### ***Instagram***

Official branded Instagram channels must use the age gate mechanism put in place in April 2015. The enablement of this age gate can be done via our Facebook representatives (detailed presentation available on Chatter or via our CSR Leader). Any linking from an Instagram account should be to a location that is age gated for alcohol-related content. Additionally branded Instagram pages should contain both a responsibility message and a note that material is intended for people over legal drinking age.

### ***Pinterest***

Branded Pinterest channels are acceptable without age gates but any linking from the site should be to a location that is age gated for alcohol related content. Additionally branded Pinterest pages should contain both a responsibility message and a note that material is intended for people over legal drinking age.

### ***YouTube (Vimeo, Hulu and other video sharing sites)***

All video material placed on this type of site should have an age warning at the beginning irrespective of whether or not it is intended to be downloaded. PERNOD RICARD and its agents should only upload material to sites which meet the 70% rule.

Wherever possible branded video channels should be age gated or restricted to registered viewers of legal drinking age.

Youtube Age Gating Guide: <https://support.google.com/youtube/answer/2950063?hl=en>

All branded video channels should contain a responsibility message within their introduction of the same font color and size as the rest of the introductory text. (See Appendix 1F for detailed requirements)

If a part of your video is used as an advertising campaign and displayed as a teaser (meaning less than 15 seconds of viewing), you are authorized to display the RDM in a ticker field at the bottom of the screen during the 15 seconds. It means you can display your full content during 15 seconds for this advertising.

### ***Others***

Advertising on all other social media sites is subject to the 70% rule.

Additionally, where it is possible to limit advertising to those of LPA/ LDA (e.g., an age-gate or registered user database) then this should be done.

Any sponsored locations should carry a message that this material is for viewing only by those of legal purchase age. All sponsored locations should carry a responsible drinking message. (see Appendix 1F for detailed requirements)

Any downloadable material should carry a download advice notice.

When someone passes directly from one of our sites with an age affirmation page to another of our sites, they may bypass the age affirmation page on the second site.

## Appendix 1 D – Standards of user generated content

We ensure all our marketing communications are socially responsible and in line with industry codes of practice. This means that all content posted by users of this site must comply with the following rules:

- It must not glorify the alcohol strength, relatively high alcohol content or intoxicating effect of a drink;
- It must not associate a drink with bravado or with violent, aggressive, dangerous or anti-social behavior;
- It must not suggest any association with, acceptance of or allusion to, illicit drugs;
- It must not associate a drink with sexual success;
- It must not suggest that drinking can lead to social success or popularity;
- It must not encourage illegal, irresponsible or immoderate drinking;
- It must not encourage “down-in-one” consumption;
- It must not have a particular appeal to those under legal purchase age;
- It must not suggest that a drink can enhance mental or physical performance;

## Appendix 1 E – Responsible Drinking Pact

### *RESPONSIBLE DRINKING PACT*

[Brand company or Market company] and all companies within the **PERNOD RICARD** group carry on a long-standing tradition of dedication to responsible drinking.

Through a broad range of initiatives, often in partnership with a wide range of organizations, including industry associations, regulators and public authorities' representatives, Pernod Ricard and its affiliates are deeply committed to promoting responsible drinking and discouraging misuse of our products.

As a consequence of our commitment to promoting responsible drinking, we hope you understand that we expect that fans will not post any comments, photos, videos and other type of content ("Post") which:

- features any people who are or appear to be under the legal drinking age, including featuring any people who are associated with drinking, who are not, or who do not look, over legal drinking age [25 years old for sites designed to a predominant UK audience];
- is made by someone under the legal drinking age;
- encourages underage purchase or drinking of alcoholic beverages or illegal, irresponsible or immoderate drinking;
- promotes over-consumption or condemns or criticizes in any way anyone who chooses not to drink alcohol;
- portrays irresponsible drinking in a positive light or associates drinking with driving, operating any kind of machinery or engaging any kind of dangerous activity;
- implies alcohol beverages have any physical, psychological, intellectual benefits or contributes to sexual success;
- implies alcohol beverages gives confidence or helps to overcome individual or social problems;
- glorifies the alcohol strength, relatively high alcohol content or intoxicating effect of a drink;
- mentions drinking alcohol in relation to any kind of illegal, antisocial, dangerous, aggressive or violent behavior.

Should your Post be not compliant with the here above, you understand that we will remove it.

We believe responsible drinking is consistent with the maintenance of a balanced and positive lifestyle for most adults who choose to drink.

For more information on our commitment for responsible drinking, please visit [any URL of the Group dedicated to responsible drinking and/or <http://www.responsibledrinking.eu/> and/or

[www.discus.org/responsibility](http://www.discus.org/responsibility) and/or local page dedicated to responsible consumption]. To provide feedback on how we can improve these efforts, do feel free to leave your comments here below!

## Appendix 1 F – Responsible Drinking Message

All **PERNOD RICARD** marketing communications (e.g. websites, advertisements, apps should contain a responsible drinking message. The precise text of the message may be varied but should advocate responsible drinking. The message can use the brand name but should not use the brand logo.

On brand websites the RDM must appear on both the AAP and the Home page. On applications it must appear on either the Welcome screen or the Home page.

All those sites should also carry a link or section directed to a simple page presenting the commitment of the brand to responsible drinking.

On Facebook pages, the RDM must be shown on the Cover photo. In addition there must be a "Responsible Pact" tab (it does not need to be named Pact must it must clearly relate to responsibility). This tab must be one of the first four tabs and therefore immediately visible on the page

The message can appear in two different forms. On advertisements and websites it appears as a line of copy. The letter height is subject to a specific formula (outlined below) and the text should be in a contrasting color to the background to ensure good visibility.

### Letter Height

As a general rule the height of the letters should be  $1/100$  the addition of the width and the height of the communication size. (rounded to the nearest whole pixel) For example on the cover photo of a Facebook page, the cover photo is 851 x 315 pixels. The letter height of the RDM should therefore be 12 pixels  $(851+315)/100$ .

However in some instances this gives an RDM that is too small to be legible. The table below therefore gives the required sizes in pixels for standard IAB ad units:

Ad size		Required Size (pixels)
88 x	31	Button - no RDM
120 x	60	No RDM if click through
160 x	600	10
300 x	600	10
180 x	150	10
180 x	160	10
728 x	90	12
970 x	90	12
300 x	250	13
550 x	480	13
970 x	250	13
300 x	1050	14
850 x	550	14

## All sizes shown in Pixels

Twitter Feed: RDM included in introduction



You Tube – RDM to be added in introduction



Flickr – introduction available on brand profile page



On sites where there is no opportunity to add a line of copy then the responsible drinking message should be included in the introductory text. In these instances the text should be in the same size, color and font as the rest of the introduction. Examples of sites where the RDM should take this form include (but is not limited to) Twitter, YouTube and Flickr Examples are shown below.

The nature of Digital media is that there is a very fast pace of change so even if there are no specific instructions regarding particular sites please ensure that a responsible drinking message is included in all your digital marketing communications in line with the principles above. If you are in any doubt about how to achieve this please contact [RMP@pernod-ricard.com](mailto:RMP@pernod-ricard.com)

## **PR Digital guidelines paper 2: Ensuring that email communications respect privacy and that all commercial communications are readily identifiable as such.**

The following rules apply to the collection and use of email addresses:

Email addresses can only be collected after age-affirmation. The addressee should consent (opt-in) to be placed on an email list. This should take the form of a box which should be ticked to OPT – IN. The box must be actively ticked, so the default should be that the box is left blank.

All marketing emails must be sent from a functioning email address that can accept replies

All marketing emails must contain the following information:

- Instructions on opting –out from receiving future messages
- Accurate origin/routing information
- The brand or company name and a physical postal address

If a marketing email has not been given prior consent (ie the recipient has not agreed to accept it, by, for example, signing up for a newsletter) then that message must be clearly identifiable from its subject heading that it is an advertisement or solicitation.

All requests for opt-outs must be honored within ten working days after receipt.

### **Emails that contain an invitation to “send to a friend”**

As with all material that can be downloaded or forwarded, there should be a notice explaining that the recipients of anything forwarded must be of legal purchase age in the country in which they are resident.

Any email that is designed to be forwarded should contain a message noting that persons receiving the message should be of legal purchase age in their country of residence.

Emails designed to be forwarded should take the recipient through an AAP before they receive the bulk of the message. Thus for example a forwarded message can contain a statement such as “look at this great new film from Malibu”, but then link to the film via an age verification page.

### **Seeding/transparency**

If we pay (in cash or in kind) for any material or messages to appear on a blog, twitterfeed, Facebook site, website or similar then it must be made clear to the reader that that is the case. This is equally true if the payment is made via a third party company (such as GoViral or ebuzzing).

This does not prevent the company or their PR agents sending material for review to established bloggers in a comparable manner to press journalists.

Please also note that the 70/30 age rule applies to blogs where PR or their agents are seeding content.



### **Transparency on blogs, forums etc**

If a PERNOD RICARD employee or agent makes any form of comment that relates to Pernod Ricard brands or any PERNOD RICARD sponsored or funded event then they must clearly state that they are an employee or agent of the company. This includes comments made on any personal sites. Equally if an employee refers to PERNOD RICARD events or uses PERNOD RICARD products, brands or pictures on a personal blog, forum or social network, this should be done with a due sense of responsibility.

### **PR Digital guidelines paper 3: Ensuring proper control of the Intellectual property issues connected with our use of digital media**

#### **There are five key areas of concern**

Only use material which you have the rights to use. As with conventional advertising you need to have rights to use all materials. This includes such things as models/voiceover, music (lyrics, musical arrangement), look and feel, background (other people, other brands, household names, books), and cinematographers rights. By way of example, please note that photographs taken at events need the written consent of all those who are visible within them. Two consents from the subjects are required – to being photographed, recorded or filmed AND to the subsequent exploiting or making public that material. Additionally a consent is required from the photographer who owns the copyright.

If you have a time limit to your rights to use something then ensure that it is taken down as soon as those rights have ended.

Ensure that Users are informed that they may only post material to which they have the appropriate copyrights. In some instances, for example Facebook, this is covered by the terms and conditions of the site you are using.

Ensure before posting any material that Users give you the right to use it. Again, for some sites (such as Facebook) this is included in the terms and conditions already.

Ensure that you have a facility in place whereby people can contact you if they feel that you have posted something which contravenes their copyright or any other IP right.

The opportunities offered by digital are increasingly exposing us to IP issues. Whenever you are involved with digital content please ensure that you have involved your legal team.

## **ANNEX 2 – GUIDELINES FOR RESPONSIBLE PROMOTIONS**

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## INTRODUCTION

These Guidelines for Responsible Promotions are an integral part of the Code for Commercial Communications. They apply in addition to the Common Standards and should therefore be read in conjunction.

**PERNOD RICARD** recognizes that promotions are an appropriate and valuable marketing tool to:

- enhance customer awareness of a product/brand;
- showcase a new product/brand.

As with all commercial communications, promotions should:

- be developed, implemented and managed responsibly;
- never be aimed at underage drinkers;
- never encourage violent, aggressive, dangerous, anti-social or illegal behavior, drink driving or alcohol misuse;
- never be demeaning to any group in society or otherwise offend accepted standards of taste and decency;
- be in full compliance with the prevailing laws, regulations and self-regulatory codes.

Given the complexity and structure of the beverage alcohol industry and the restaurant, retail, bar and hospitality business globally the manufacturer whose product(s) is/are part of a promotional activity may not always be involved in or even aware of that particular activity. This of course affects the degree of control – if any – the manufacturer can exert over the content and tone of such activities. The operator and/or owner of the venue where the promotional activity takes place are important parties for the implementation of promotional activities.

This said, **PERNOD RICARD** recognizes that it is in its interest and in the interest of the society as a whole that beverage alcohol products are promoted responsibly. **PERNOD RICARD** therefore commits itself to working with the relevant organizations helping to ensure that these Guidelines are fully understood and communicated widely in sectors such as:

- Retail
- Hotels / restaurants / cafes / bars / nightclubs / discotheques
- Tourism boards
- Educational bodies and institutes from the HORECA industry
- Promotion agencies and promotion suppliers
- Events producers and organizers

## TYPES OF PROMOTIONS

Promotional activities of alcohol beverages can take place broadly in the following types of settings:

- In store (small shops, supermarkets, hypermarkets)
- On-premise (licensed establishments)
- Third party events

- In-house (e.g. production facility tours)
- Own events in non-traditional locations (e.g. brand-owner sports event, brand's music or dance festivals, train stations, on the beach, old industrial sites, spontaneous gatherings/events organized via sms)
- Private homes of consumers

As circumstances and settings greatly vary, there is not one rule for everyone. These Guidelines, based on the provisions of the Code Commercial Communications, aim to provide practical tips on a number of aspects concerning promotional activities:

- setting
- content
- tone
- approach
- audience (age) profile

These Guidelines cover both the actual activity and the supporting materials.

## **GUIDELINES FOR POINT-OF-SALES PROMOTIONS**

### **Basic Principles**

Commercial Communications should:

- be legal, decent, honest and truthful and conform to accepted principles of fair competition and good business practice;
  - be prepared with a due sense of social responsibility and be based on principles of fairness and good faith;
  - not in any circumstances be unethical or otherwise impugn human dignity and integrity.
- a. There should be no form of discrimination of participation on the grounds of race, sexual orientation, religion, political inclination etc.
  - b. Avoid images, messages or activities which are likely to be considered gratuitously offensive or demeaning.
  - c. Ensure that the price for the alcohol beverage(s) is/are known to all consumers.
  - d. Ensure that the alcoholic nature / alcohol content of the promoted alcohol beverage(s) is/are known to consumers when the promotional activity is being started.

### **Article 1 - Misuse**

1.1 Commercial Communications should not encourage or condone excessive or irresponsible consumption, nor present abstinence or moderation in any negative way.

- 1.2 Commercial Communications should not show people who appear to be drunk or in any way imply that drunkenness is acceptable.
- 1.3 Commercial Communications should not suggest any association with violent, aggressive, illegal, dangerous or antisocial behavior.
- 1.4 Commercial Communications should avoid any association with, acceptance of, or allusion to drug culture or illicit drugs.
- a. Never encourage irresponsible and excessive consumption of alcohol beverages.
  - b. Do not use any “drinking games” that may encourage excessive or irresponsible consumption, such as activities which involve either “speed incentives” or drinking an excessive amount of alcohol beverages within a short period of time.
  - c. Do not serve consumers who are or appear to be uncontrollably excited, drunk, aggressive or engaging in anti-social behavior. Ensure your staff is fully briefed on how to manage consumers who appear drunk, aggressive or anti-social.
  - d. Do not exercise any pressure on people not willing to participate.
  - e. Do not act negatively towards people who are not interested in the promotion.
  - f. It is good practice to display a clearly visible and appropriate responsible drinking message.
  - g. Ensure none of the aspects of the activity encourages excessive or irresponsible consumption (content, language, behavior of promotional teams, price/timing etc).
  - h. If a promotion or incentive includes a multi-purchase, consumers are not encouraged to drink over the national recommendation for sensible drinking.
  - i. Promotional activities and messages should never encourage consumers to engage in risky or potentially dangerous activities or behavior.

## **Article 2 - Minors**

- 2.1 Commercial Communications should not be specifically aimed at minors nor show minors consuming alcohol beverages.
- 2.2 Commercial Communications should only promote alcohol beverages in print and broadcast media for which at least 70% of the audience are reasonably expected to be adults 18 years or older. It should not promote alcohol beverages in print and broadcast media or events for which more than 30% of the audience is known or reasonable expected to be minors.
- 2.3 Commercial Communications should not use models and actors who are not at least 25 years of age.

2.4 Commercial Communications should not use objects, images, styles, symbols, colors, music and characters (either real or fictitious, including cartoon figures or celebrities such as sporting heroes) of primary appeal to children or adolescents.

2.5 Commercial Communications should not use brand identification such as names, logos, games, game equipment or other items of primary appeal to minors.

- a. Never engage in promotional activities inviting people under the legal purchase or drink age to participate.
- b. Do not allow people below the legal drinking age to participate.
- c. Do not carry out the promotion at all if it is reasonably expected that more than 30% of the public will consist of people under the legal drinking age. In case of doubt, do not go ahead with the activity (please check percentages as they may vary from country to country).
- d. Consider using displays to inform consumers that alcohol beverages should only be consumed by people over the legal purchase age (please see also point f under point 1 Misuse).
- e. In case of doubt about the legality of the age, ask for proof of age, when appropriate (be aware of national laws and regulations regarding identity / proof of age requests).
- f. Ensure that none of the aspects of the activity primarily appeal to people under the legal drinking age (content, language, cartoons, music, celebrities etc).
- g. Alcohol brands should not feature on children/adolescent size clothing.

### **Article 3 - Drinking and Driving**

Commercial Communications should not suggest that the consumption of alcohol beverages is acceptable before or whilst driving motor vehicles of any kind, including speed boats, jet-skis, snow-mobiles and airplanes.

- a. Be particularly vigilant about the participation of consumers who may drive following participation, e.g. in a supermarket tasting.
- b. Consider displaying a “don’t drink and drive” message.
- c. Be careful with promotions in venues closely linked with driving (e.g. highway stores/restaurants).
- d. While motor vehicles can be used as prizes, great care must be taken at the awards ceremony to ensure the vehicle cannot be driven by anyone who has consumed alcohol beverages (e.g. vehicle keys can be handed over the day after the award ceremony).



#### **Article 4 - Hazardous Activities, Workplace & Recreation**

Commercial Communications should not suggest that the consumption of alcohol beverages is acceptable before or whilst operating potentially dangerous machinery, or with undertaking any potentially hazardous recreational or work-related activity.

- a. Ensure that the promotion does not include or encourage a hazardous activity.

#### **Article 5 - Health Aspects**

5.1 Commercial Communications should not claim that alcohol beverages may have therapeutic properties and that their consumption may help preventing, treating or curing any human disease.

5.2 Where permitted by law, Commercial Communications using truthful and accurate factual statements about carbohydrate, calories or other nutrient content may be appropriate in some circumstances.

- a. Ensure that no aspects of the activity imply that the alcohol beverage has any properties of preventing, treating or curing a human disease.

#### **Article 6 - Pregnancy**

Commercial Communication should not show pregnant women drinking or specifically aim at women who are pregnant.

#### **Article 7 - Alcohol Content**

7.1 Commercial Communications should not create any confusion as to the nature and strength of alcohol beverages.

7.2 Commercial Communications may present information for consumers on alcoholic strength but should not emphasize high alcoholic strength as a dominant theme in any brand communications materials. On the other hand, messages may not imply that consuming alcohol beverages of low alcohol content will avoid abuse.

- a. Ensure that participants in the promotion know that alcohol is involved.
- b. Do not use drink-delivery methods / gimmicks which might confuse or mislead the consumer as to the amount of alcohol they are consuming (e.g. alcohol sprays, vaporizers).

#### **Article 8 - Performance**

Commercial Communications should not create the impression that consumption of alcohol beverages enhances mental ability or physical performance or has an energizing effect, e.g. when engaging in activities requiring concentration in order to be safely executed.

- a. Do not encourage or promote drinking prior to engaging in sports.
- b. Do not initiate joint promotions with energy drinks and marketed as such.

### **Article 9 - Social Success**

Commercial Communications should not suggest that the consumption of alcohol beverages is a requirement for social acceptance or success.

### **Article 10 - Sexual Success**

10.1 Under no circumstances should Commercial Communications be unethical, offend against generally prevailing standards of taste and decency or otherwise impugn human dignity and integrity.

10.2 Commercial Communications should not suggest that the consumption of alcohol beverages enhances sexual capabilities, attractiveness or leads to sexual relations.

### **Article 11 - Sampling**

No sampling of alcohol beverages should be offered to minors; it is allowed at licensed or private premises, trade fairs or occasions in accordance with local regulations.

It should be noted that the provisions of the Code for Commercial Communications and the guidance given in this guidelines for promotions also apply to sampling, i.e. informing the consumer about what they are to sample, alcohol strength, not sampling someone who is drunk, where people are potentially participating in risky or dangerous activity or where they potentially engage in anti-social behavior etc.

## **PROHIBITED PHYSICAL POS / PROMOTIONAL ITEMS**

Promotions involving drinking vessels, gimmicks, sprays or other drink dispensing mechanisms which either:

- Encourage excessive drinking
- And/or mean that consumers cannot readily tell how much alcohol they are consuming (e.g. squirt guns, AWOL machines).
- And/or mean that consumers do not have control on the amount of alcohol they are consuming, or the speed of delivery (free-pour luges, 'dentist chairs').
- Drinking vessels, gimmicks or drink-dispensing mechanisms with medical or pharmaceutical connotations, e.g. syringes, test tubes.
- Promotions which involve religious or other symbols and references which could cause offence in the context of an alcohol beverage promotion.
- Sweets or children's confectionary: no confectionary/treats that are primarily associated with children; adult confectionary is acceptable, liqueur chocolates, dark chocolate, if in doubt sales data should be looked at to ensure adult audience.



- Prize giveaways and games primarily appealing to underage.
- Drinking games and/or games that can encourage irresponsible consumption.
- Seduction games with a sexual content or connotation.
- Inflatable e.g. doughnuts, lilos, inflatable beds/pillows, chairs, etc likely to be used in the water should not be primarily appealing to underage.
- Clothes in children's sizes or any reference thereto,
- Sex toys
- Branded condoms
- Hangover cures

## **ANNEX 3 – SPONSORSHIP GUIDELINES**

## INTRODUCTION

**PERNOD RICARD** treats sponsorship with the same due diligence and great respect for maintenance of the high standards of responsibility that they apply to all other marketing disciplines.

Sponsorship for the purpose of these guidelines means any commercial agreement by which a sponsor, for the mutual benefit of the sponsor and sponsored party, contractually provides financing or other support in order to establish an association between the sponsor's brands or products and a sponsorship property in return for rights to promote this association and/or for the granting of certain agreed direct or indirect benefits.

## SPECIFIC GUIDANCE FOR ALCOHOL BEVERAGE BRAND SPONSORSHIPS

- The Code for Commercial Communications along with these complementary guidelines apply to the overall sponsorship agreement, including any sponsored event material carrying the sponsor's logo or trademark for the duration of the sponsorship agreement.
- However it does not concern partnerships with artists (films makers, painters, musicians...) where there is no brand communications in their artwork.
- **PERNOD RICARD** should not engage in sponsorship agreements unless at least 70% of the audience for the event (meaning those attending the event and the audience for broadcast media coverage of the event) are reasonably expected to be of LPA/LDA or older. It is the sponsor's responsibility to demonstrate that this requirement has been met.
- Sponsorship by **PERNOD RICARD** to assist programs encouraging social responsibility or discourage underage drinking is covered by the Code for Commercial Communications and this guidance and shall not be in breach thereof.
- Sponsorship in any field may be accompanied by an activity or message promoting responsible drinking behavior.
- **PERNOD RICARD** shall require sports sponsored parties not to feature alcohol branding on children's size replica sports items, but instead to offer such items without alcohol beverage branding.
- No branded merchandise associated with a sponsorship should be aimed at those under legal purchase age or have a particular appeal to them beyond the appeal the merchandise has for the adult public.
- **PERNOD RICARD** will not sponsor junior sports teams, junior sports leagues or junior cultural events, such as musical/talent contests or awards primarily for people under LPA/LDA. However, an adult oriented cultural or sports event meeting the 70% threshold (e.g., city orchestra or opera) may be sponsored even if it should turn out that a small number of the performers are under LPA/LDA.
- With respect to sponsored sports or activities that could be considered dangerous, there should be no suggestion that players/performers consume alcohol before or while performing, or that alcohol consumption enhances their performance in any way.