



**SUNTORY**  
OCEANIA

# RESPONSIBLE MARKETING CODE

January 2023

# INTRODUCTION

Driven by our Suntory Group purpose of **Growing for Good**, we have a long-standing commitment to responsible marketing for our many well-loved brands across Oceania.

As our business grows, the Suntory Oceania Responsible Marketing Code demonstrates our focus on ensuring that our marketing always reflects our values, striving to deliver the highest quality products and standards in everything we do.

The core principles behind our Marketing Code are centred around:

- Accountability
- Personal Choice
- Inclusivity
- Sustainability
- Privacy

The purpose of the Code is to serve as a framework to ensure all Suntory Oceania Marketing activity represents our brands and aligns with our values and commitment to our consumers and the wider community. All employees, partners, agencies and anyone acting on our behalf are required to adhere to this Code to ensure our established principles are consistently upheld across all brand marketing.

# SCOPE

The Suntory Oceania Responsible Marketing Code is applied to all local marketing communications generated by or on behalf of Suntory Oceania across Oceania.

Marketing refers to all creative content generated by Suntory Oceania or its brands. The intent is to cover product advertising and promotional content across all media, including but not limited to Brand Promotion, Brand Advertising, Brand PR, Sponsorship and Brand Experiential Marketing, Packaging, Point of Sale Material, Digital and Social Media Platforms, Influencer Activity and Direct Marketing.

# GOVERNANCE

We utilise appropriate internal governance forums to ensure our marketing complies with external regulatory guidelines and our own Responsible Marketing Code, as well as undertaking regular reviews with our media agency partners.

We will continue to review this code on a bi-annual basis to ensure it reflects both our own and our stakeholder expectations.

# ACCOUNTABILITY

## Marketing to Children

Following all in-country standards for responsible marketing to children, we do not advertise to children 14 years of age or younger. In New Zealand, we also abide by the regulations which govern advertising to young people (14–18 years).

### This means we will:

- only place advertising and marketing communications in channels where at least 75 per cent of the audience is reasonably expected to be above 14 years old;
- not use celebrities, social influencers or characters whose primary appeal is to children 14 years or younger;
- not undertake sales promotions or use merchandise that would have strong primary appeal to children 14 years or younger;
- not sponsor activities that target children or would have strong primary appeal to children 14 years or younger;
- not advertise or undertake any form of marketing communication in schools, early childhood education centres or other locations where children gather;
- only sell bottled water directly to primary and intermediate schools, as part of the NZ Government's Healthy Kids Industry Pledge and Australian States & Territories' frameworks for school supply;
- we use social media data insights and platform governance to ensure communications are directed to people reasonably expected to be 15 years or older;
- not show images of children in marketing communications unless they are relevant to the message or product i.e. in the context of a family situation or an activity with a parent or carer;
- not design any promotion, partnership or sampling activity to appeal directly to children 14 years or younger; and
- not offer sampling to children under 16 years, to ensure this meets our own minimum threshold for 14 years or younger.

## Products, Promotions, Partnerships and Sampling

When we undertake promotions, partnerships or sampling opportunities, we ensure they align to our principles and do not encourage irresponsible behaviour.

At the heart of all brand communications, a product and its benefits must be truthfully represented.

### This means we will:

- work closely with the relevant regulatory bodies to ensure we comply with local legislation and guidelines, including the Food Standards Code for Australia and New Zealand;
- always be thoughtful in all brand claims, ensuring these are supported by robust research, expert references or scientific data; and
- clearly disclose any third-party agreements to endorse our products, including partnerships with ambassadors or social influencers.

# PERSONAL CHOICE

## Responsible Consumption

We are committed to responsible and creative marketing across all of our brands, providing consumers with the information they need to make the right choices in the context of their diet and lifestyle.

**This means we will:**

- encourage responsible consumption and behaviour in relation to our products, in line with social and ethical standards. As such, we may consider a number of factors when reviewing our marketing, including the activities, environment or portion size shown in our creative concepts;
- provide consumers with nutritional information about the product on front and back-of-pack labelling. This includes our commitment to the Health Star Rating system, which continues to roll out across our range as packaging changes occur;
- use marketing to ensure consumers are aware of our wide range of low and no-sugar beverages; and
- where possible within the brand portfolio, look to include a water or no/low sugar drink as an option within a third-party promotion or in above-the-line communications.

## Energy Drinks

Australia and New Zealand have some of the most stringent energy drinks regulations in the world. Like all drinks containing caffeine, energy drinks should be enjoyed in moderation and we are committed that our marketing activity always reflects this. We have made a number of specific industry commitments regarding this, including the [Australia Energy Drinks Commitment](#) and [New Zealand Energy Drinks Commitment](#).

**This means we will:**

- not create the impression that the consumption of energy drinks disproportionately and uniquely enhance ability, physical performance or characteristics;
- not promote excessive consumption or market energy drinks as only providing hydration; and
- ensure appropriate on-pack information about caffeine, in line with the FSANZ Food Standards Code. This includes information on caffeine content, recommended daily consumption guidelines, as well as including advisory statements that the products are not suitable for children, pregnant or lactating women.

## Alcohol Partnerships

We recognise that alcohol is enjoyed responsibly by consumers across Oceania and that some of our products, including our energy drink brands, may be used as mixers in social occasions.

It is our responsibility to market and promote any partnerships in a responsible manner, in line with our values and all relevant local alcohol legislation and regulations.

### This means we will:

- put safeguards in place to ensure any mixer/alcohol partnership activities are only promoted to adults of legal purchase age;
- only use broadcast, cable, radio, print, and internet/digital communications where at least 70 per cent of the audience is reasonably expected to be above the legal purchase age;
- make all efforts to ensure appropriate measures are in place when we participate in external events where at least 70 per cent of the attendees is reasonably expected to be above the legal purchase age;
- work with any customers or partners to establish promotional boundaries suitable to the alcohol category, such as in placement, timing or messaging; and
- not suggest that consumption of our brands with alcohol will lead to any behaviour or performance enhancements.



# SUSTAINABILITY

Our business is driven by Growing for Good, a belief that we can grow while protecting our environment and play an active role in improving our communities.

Consistent with our [sustainability goals](#), this means we will:

- seek out low-CO2 channels for our advertisements where possible, such as LED billboards or deploying content through digital channels to minimise materials use;
- consider the quantities and types of items used across our promotions which will excite our consumers and minimise any excess or waste;
- look to employ sustainable materials across our sampling and promotions, including rPET plastics, low emission fridges and recycled materials; and
- promote responsible disposal of product packaging for recycling during sampling and regular purchase occasions

# INCLUSIVITY

Our commitment to Diversity, Equity and Inclusion starts with the [way we do business every day](#).

Our team is stronger for its differences, and the world is better when communications reflect its true diversity. We know that there is enormous diversity across our communities, and we want to represent that in the people who contribute to our

marketing efforts and in our Suntory Oceania marketing content.

This means we will:

- respectfully represent the diversity of our communities, including age, appearance, ethnicity, gender, sexuality, and physical and mental abilities; and
- be sensitive to local, cultural and religious practices.

# PRIVACY

Through our marketing activities and promotions, we are acutely aware of the responsibility to manage personal data. We commit to keeping data confidential and to be transparent in how we use it in line with local regulations.

This means we will:

- protect the data of those participating in our marketing communications and not share with any third parties, unless authorised by the participant;
- prominently display a link to our [Privacy Policy](#) on all relevant assets and platforms, including our websites and promotions;
- take care that any initiatives designed to also collect personal information will be transparent about the collection, storage and use of the data; and
- comply with all data protection regulations and provide clear and transparent mechanisms for consumers to opt-in and opt-out of marketing communications.

# SUNTORY OCEANIA

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