

SHS Drinks

Code of Conduct

Welcome to our updated Code of Conduct.

This document provides a clear guide on how we market our soft and alcoholic drinks brands, in a responsible manner. It also covers our employee alcohol policy, event hosting notes and our commitments on sustainability.

As members of the Portman Group, we adhere to their Code of Practice, as well as the ASA and Ofcom regulations. All staff and agencies must work within these and all other industry guidelines and are trained annually to this effect.

Our Code of Conduct not only gives a simple point of reference across these different areas, but also demonstrates our business value of going the extra mile on responsibility; to our consumers, customers, staff and our community.

Regards

Dave McNulty

Managing Director
The SHS Group Drinks Division
September 2016



Alcohol Code of Conduct

1. We promote responsible drinking, by;

- Supporting drinkaware.co.uk and including the web address on all our marketing communications
- Committing to full labelling requirements including unit information, pregnancy and responsibility messaging
- Not focusing on the strength of any product as the dominant theme (unless as a low alcohol alternative)
- Ensuring none of our marketing communications condone or encourage excessive, rapid, heavy or irresponsible consumption or drunkenness.
- Including a clear “Share” message for any on trade promotions intended for more than one person. Any such jugs (or cocktail vessels) should not contain more than 4 units of alcohol in total and should be shown poured out into glasses to highlight the shared serve.

2. We only market our brands to over 18's, by;

- Ensuring our target audience or attendees are over 18 (or at least 75% over 18 where 100% is not guaranteed, i.e. in media ratings)
- People shown in our marketing communications are, and look, over 25
- Installing age gates on all our websites and associated mailings or other social media. If the age gate is failed, the user will be redirected to drinkaware.co.uk
- Never using cartoon or childlike imagery that appeals to under 18's
- Never advertising near schools

3. We do not condone illegal or anti-social behaviour, by;

- Ensuring no communications condone or reference drinking and driving or use of illicit drugs.
- Avoiding any suggestion of a challenge, bravado, violent or aggressive behaviour, or including any activities which would be dangerous after alcohol consumption.

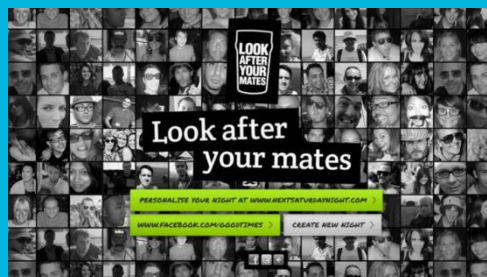


Alcohol Code of Conduct

4. **We do not promote any enhanced outcomes, by;**
 - Ensuring we do not reference any implied success either mentally, physically, socially or sexually or that alcohol is a key component to any event.
 - Avoiding any association with therapeutic properties or sexual activity.

5. **We run responsible events, by;**
 - Briefing all sampling staff on relevant legislation and only serving over 18's, with one sample per person
 - Ensuring promotions meet all previous criteria for responsible drinking, including displaying responsible drinking messages such as drinkaware.co.uk
 - Ensuring free drinking water is available at all events
 - Ensuring soft drink alternatives, food and transportation are available at our corporate events

6. **We go the extra mile to take an active role in the future of a sustainable & responsible alcohol market, by;**
 - Committing to Responsibility Deal Alcohol pledges and supporting other regional guidance and codes
 - Working with trade bodies to understand all legal and technical requirements for our brands
 - Getting involved in responsibility campaigns if appropriate wherever and however we can
 - Developing our own responsibility campaign entitled “Look After Your Mates” to reach young adults with relevant messaging on the immediate consequences of irresponsible drinking choices



Local Legislation

Key restrictions above and beyond our Code:

Scotland (N.B. Minimum pricing has been delayed due to transfer to the European Courts)

- No free drinks or multi-buys
- Multi-packs cannot be sold for less than the equivalent single unit price
- No unlimited alcohol for a fixed charge
- Should not encourage more consumption than intended
- Should not be based on strength of alcohol
- Should not reward drinking quickly
- Should not offer alcohol as a reward or prize (will apply in off trade as well)

England & Wales

- Nothing which encourages you to:
 - Drink a certain amount within a time limit (e.g. Buy 3 WKD before 9pm and get x)
 - Drink as much alcohol as possible (e.g. how many WKD can you drink before 10pm)
- No unlimited alcohol free or for a fixed or discounted fee (e.g. £6 all you can drink)
- No free or discounted alcohol or prizes when:
 - Related to 24 hours or less – ensure over a weekend or two days
 - Based on the outcome of a race, competition etc shown on the premises
- No flyers which condone anti-social behaviour or show drunkenness favourably
- No Dentist Chairs or direct dispense into a customers mouth
- No selling product at less than cost (defined as duty plus VAT)

Northern Ireland

- Responsible retailing code in place to mirror those E&W points above

Please refer to checklist opposite to confirm suitable promotions examples. Responsibility for adhering to the law remains with the licensee and will be enforced by local trading standards, police or licensing officers.



Promotional Checklist

Promotional Checklist	Example	England & Wales	Scotland	NI
Sampling	<i>Thimble size only</i>	✓	✓	✓
Sampling	<i>With BOGOF vouchers</i>	✓	✗	✗
Single bottle price or giveaway	<i>£2 bottle Buy 1 get key ring</i>	✓	✓	✓
Multi-buy price or giveaway	<i>£4 for 2 bottles Buy 2 get a hat</i>	✓	✗	✓
Free prize draw where prize is not alcohol	<i>Holidays/Wii</i>	✓	✓	✓
Luck based scratch card	<i>Brew of Bust</i>	✓	✓	✓
Promo window of 24 hours	<i>St Patricks ROS kits</i>	✗	✗	✗
Promo window of 72 hours	<i>Promo changes mid week</i>	✓	✓	✓
Drink x within a time period	<i>Run to the bar now/ buy 3 before 9pm</i>	✗	✗	✗
Drink as much as possible	<i>How many can you drinks before 10pm</i>	✗	✗	✗
Unlimited alcohol for a fee	<i>£6 all you can drink</i>	✗	✗	✗
Prizes based on the outcome of a game/event	<i>90 minute kits</i>	✗	✗	✗

Did you know...

- There is only 1.1 unit of alcohol in a 275ml bottle of WKD, at 4% ABV
- Most WKD is priced at over £1 per bottle*, making it more expensive per unit than some wines
- Merrydown Cider is best consumed with food due to it's unique recipe of eating apples and champagne yeast
- Spirit beers and spirit ciders (Speers & Spiders) are a growth market, up +72%^ year on year
- **Alcohol consumption per capita is in decline by 18%~ with less people drinking beyond daily unit guidelines (particularly 18-24 yr olds)**

*275ml; Please note that pricing remains the remit of the retailer but this is based on retail selling price audits

^ Spirit beers; CGA: GB On trade PPL brands value £m MAT data to 22.03.14, Nielsen Scantrack: GB total coverage PPL brands value £m MAT data to 26.04.14. ~BBPA/HMRC clearance data March 2014 and ONS March 2013



Responsible Brands and People

As a responsible drinks producer, we go the extra mile to proactively raise the bar on industry best practice across the board:

- **Full members of The Portman Group since April 2004**
 - 1 of 9 member companies (with AB Inbev, Bacardi Brown-Forman, Carlsberg, Diageo, Heineken, Molson Coors, Pernod Ricard, SAB Miller)
- **Drinkaware**
 - Supported since inception in 2007
 - Extra Mile award for “Why Let Good Times Go Bad” implementation
 - Reflected in our own Responsible Drinking Campaign: “Look After Your Mates” to influence 18-25 year old social attitudes
- **Responsibility Deal**
 - A1. Alcohol Labelling
 - A5. Support for Drinkaware
 - A6. Advertising & Marketing Alcohol
 - A7. Community Actions to Tackle Alcohol Harms
 - A8. Lower Alcohol and Unit Reduction
 - F4. Calorie Reduction
 - P3. Active Travel
 - H4. Healthier Staff Restaurants
- **Local initiatives**
 - 1 of 5 supporting partners for Community Alcohol Partnerships (with Bacardi Brown-Forman, Diageo, Heineken and Molson Coors)
 - Working with Gloucester Local Alcohol Action Area project lead
 - Sponsor local police safety initiatives
 - SHS Group sponsorship of SOS Bus in Belfast
- **Members of trade bodies and research providers**
 - Ensures latest legislation and best practice awareness
- **Sustainable production sites**
 - High scoring BRC audits at all owned and contracted sites
 - Positive reductions in water and energy usage
 - Effective solutions to reduce wastage and improve recycling
 - Working on Sustainability Road Map with BSDA
- **Focus on people - through engagement programmes across the business**
 - Training & Development
 - Health & Wellbeing
 - Community



Soft Drinks Code of Conduct

1. We provide clear product information, by;

- Labelling all our products with detailed ingredients and nutritional data
- Ensuring all such data is clearly available on our websites and by contacting our team
- Following all guidelines on products containing caffeine (although not currently relevant to our brands)

2. We promote our brands responsibly, by;

- Not targeting our advertising at children (age 12 or below)
- Demonstrating sharing and choices available
- Do not condone or promote excessive consumption of soft drinks

3. We encourage responsible consumption, by;

- Highlighting recycling of all our product containers
- Provide a range of different pack sizes where possible
- Promoting soft drinks as an alternative to alcohol (i.e. through meal deals) and actively supplying soft drinks to events with partners, customers or consumers where alcohol is also being consumed
- Applying our Alcohol Code of Conduct on any cocktail or link promotions with our soft drinks and spirits
- Ensuring that all those working on soft drinks in our business (and agencies) understand this Code and our commitments

Did you know...

- Shloer and Bottlegreen use natural sugars and flavours, with an average sugar level of 9g per 100ml – less than most fruit juices
- We use a range of natural sugars because they give the best flavour. Sugar is a natural and traditional product which complements the natural flavours in all fruits – with no aftertaste.
- We are working with the British Soft Drinks Association to ensure that government have the right information before making decisions on some of the muted proposals such as sugar tax, and to remind them that the industry currently contributes around £7.7 billion to the UK economy and supports 135,000 jobs in the UK.
- ***Soft drinks account for just 3%* of calorie intake in the average UK diet***

*Including fruit juice; National Diet and Nutrition Survey: Results from Years 1-4 (combined 2008/2009 – 2011/12)



Employee Alcohol Policy

This Policy applies to all SHS Drinks Employees, full and part time (and applies to agency temps also). It provides you with a common sense set of guidelines we ask you to read, absorb and observe. It is a checklist for your own interests.

This Policy should work alongside SHS Drinks Code of Conduct and the Company Terms and Conditions of Employment.

We encourage everyone to make themselves aware of sensible drinking guidelines. Please view the www.drinkaware.co.uk website.

Guidelines

1. You are an important part of SHS Drinks. The image and reputation of any Company can be determined by the way its employees behave. You are Company ambassadors!

We therefore ask you to respect this important role and do not put your own or the Company's reputation at risk.

2. Alcohol should never threaten your safety or the safety of others. Everyone must ensure that his or her performance and judgement at work are not impaired by alcohol.

Deciding whether to drink or not is essentially a personal choice, but you should never feel you are in a situation whereby you have to have a drink to 'be part of the crowd'.

3. SHS Drinks will not tolerate driving whilst under the influence of alcohol. A conviction for drink driving, whether on company business or not, is a serious breach of your Contract of Employment. Drinking and driving is an illegal offence.

At formal events, it is the senior manager, or organisers role to ensure alternative transport is available, if reasonably required.

If requested, Managers should provide guidance on what time their teams are expected to be 'on the road' in the morning. It is your responsibility to manage unit intake and ensure you do not put yourself or others at risk. For unit information, see www.drinkaware.co.uk.

4. If you believe you have a dependency on alcohol, then you should be able to discuss this with your senior/ line manager and we encourage you to seek medical advice. Any conversations will be kept confidential, with only those having a need to know being informed.

5. Everyone is responsible for ensuring that people under the legal drinking age do not consume alcohol. This includes any social company event, corporate entertainment or sampling at marketing events.

SHS Drinks are full members of The Portman Group.

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The SHS Group Drinks Division June 2014

drinkaware.co.uk