



Code of Commercial Communications

To Be the Best Beer Company in a Better World

**Commercial communications
play a fundamental role
in the success of a free market
economy.**

DIFFERENT BY CHOICE



Preface - A word from our CEO

At Anheuser-Busch InBev, we brew our beers to be enjoyed responsibly by individuals of legal drinking age. We take great pride in our global and local brands. Our beers are natural products, carefully crafted from premium ingredients, that provide great enjoyment to our consumers.

As a leading global consumer products company with a dream to become “the best beer company in a better world,” it is important that we market and promote our beers in a responsible way. Following the coming together of our two companies, this first version of the official Anheuser-Busch InBev Commercial Communications Code is designed to help ensure that all of our colleagues, as well as our business partners, demonstrate best-practice leadership in this area.

We recognize that as the largest brewer in the world, we have a great responsibility to ensure that our communications are honest, truthful, in keeping with contemporary standards of good taste, and sensitive to cultural differences between markets. Compliance with the Code is mandatory for all of our marketing, promotion and communications efforts, and includes both traditional, as well as digital and social media.

Putting our commercial communications Code into practice every day is part of our company's strong tradition of corporate responsibility that dates back nearly a century. Because we care about the well-being of those around us, because we care about our reputation as a company and that of our brands, which are some of the best-loved beers in the world, we are committed to ensuring they are marketed and promoted responsibly.

Thank you for living our Code.



A handwritten signature in black ink that reads "C Brito". The signature is written in a cursive, slightly stylized font.

All the best,
Carlos Brito
Chief Executive Officer

Introduction

Beer is regularly enjoyed by people the world over and has been an integral part of society for centuries in many cultures around the world. When consumed responsibly, beer can be part of a balanced and healthy lifestyle for most people.

Commercial communications play a fundamental role in the success of a free market economy. They facilitate competition and allow for new products to be introduced to consumers. As responsible brewers, we want to ensure that our beer commercial communications are directed only to those above the legal drinking age¹ and are carried out in a socially responsible manner. When applying the Code, we will be sensitive to local and cultural differences between the markets.

The Code shall be used as a company reference for all commercial communications and shall be regarded as the minimum standard.

Scope of the Code

The Code applies to all forms of brand marketing or commercial communications for all AB InBev products that carry a beer trade name and/or have a beer taste profile including:

- advertising through digital² and non-digital media
- sponsorships
- indoor and outdoor events
- AB InBev authorized promotional activities (on premise & off premise)
- relationship marketing
- consumer PR
- packaging and labelling
- point of connection materials
- merchandising
- brand names
- product placement³

The Code does not apply to the use of branded or non-branded materials as part of a responsible drinking/alcohol education activity and brewery visitor attractions.

Where the Code refers to 'alcohol-free' beers, the local definition of 'alcohol-free' is to be applied.

The Code applies to all those involved in the marketing of AB InBev brands including internal brand, promotions and sponsorship teams, as well as external advertising, design, public relations, sales promotions, events and media buying agencies.

¹ Legal drinking age¹ refers to the age by which individuals may lawfully drink or purchase alcohol beverages, whichever is greater. For those countries that have no minimum legal drinking age, it is AB InBev's policy not to direct its marketing activities to individuals below the age of 18.

² See the *Guidelines for the application of the Commercial Communications Code to digital marketing communications* in Annex I.

³ See the *Guidelines for on-screen use of Anheuser-Busch InBev property* in Annex II.



General Principle

All forms of commercial communications involving Anheuser-Busch InBev beer brands shall be ethical, honest and truthful, and must reflect generally accepted contemporary standards of good taste and decency.

1. Responsible drinking

We believe that when consumed responsibly, beer can be part of a healthy and balanced lifestyle. We will market and promote our beer in a manner that is consistent with responsible consumption.

- I. We will not depict situations where beer is being or has been consumed excessively or in an irresponsible way. Neither will we imply that such situations are acceptable.
- II. We will not present abstinence or moderation in a negative way. There are situations or times when consuming alcohol beverages may not be appropriate, and we will always respect an individual's choice not to drink.
- III. Our marketing materials will not portray pregnant women drinking our beer or be directed to pregnant women.

IV. We will not suggest any association with violent or excessive behavior that is not clearly recognizable as humor, parody, satire or spoof, and we will not associate our products with anti-social behavior such as crowd mayhem or public disorder.

V. AB InBev-sponsored promotional activities will not encourage irresponsible consumption of our products, either through volume, time span or in any other way. No pressure will be placed on people to participate in our promotional activities. In particular, our marketing materials or promotional activities will not include and/or promote drinking games or utilize drinking vessels, gimmicks, sprays or other drink-dispensing mechanisms where the consumer does not have control over the delivery of the alcohol consumed.

VI. AB InBev brand marketing websites will carry a clear responsible drinking message.

We will market and promote our beer in a manner that is consistent with responsible consumption.

2. Legal drinking age

AB InBev's beer marketing is directed at individuals of legal drinking age and above. In the Code, 'legal drinking age' refers to the age by which individuals may lawfully drink or purchase alcohol beverages, whichever is higher. For those countries that have no minimum legal drinking age, it is AB InBev's policy not to direct its marketing activities to individuals below the age of 18.

No AB InBev or AB InBev subsidiary's marketing will target individuals below the legal drinking age. AB InBev's commitment to this principle will be supported by the following provisions:

- I. We will not employ any symbol, image, object, cartoon character, celebrity, music or language that is primarily intended to appeal to children or adolescents.
- II. All actors and models shown drinking and/or actively promoting our beer in any marketing materials must be at least 25 years old and must reasonably appear to be over the legal drinking age.
 - People involved in promotions for our brands in the on-/off trade must be legal drinking age or older.
- III. We will aim to place our marketing materials in media where a minimum of 70% of the audience for that media is reasonably expected to be above the legal drinking age. We recognize that at the time of placement, audience composition is predicted based on past experience.
 - AB InBev will work closely with its agencies and media buyers to predict as accurately as possible that at least 70% of the target audience will be above the legal drinking age⁴.
 - We will ask our media partners to provide – where available – post-monitoring reports on audience composition at half-yearly intervals to double-check compliance to the highest practical level.
- IV. We will not sponsor or target our marketing activities at events where the majority of the audience is expected to be below the legal drinking age.
- V. We will not allow our brand logos or trademarks to be licensed for use on toys, children's clothing, or on materials or merchandise for use primarily by persons below the legal drinking age.
- VI. We will take all reasonable steps to ensure that AB InBev-sponsored promotions will not allow sampling for anyone below the legal drinking age. Our promotions staff will be trained to request proof of age and will be directed to refuse to serve samples to underage individuals.
- VII. At AB InBev-sponsored events, we will provide for the availability of non-alcohol beverages for those individuals who are either under the legal drinking age or choose not to drink our beer.

4 Any exceptions to this rule, based on the particular demographics of a country or for any other reason, must be pre-cleared by the legal team.

**Anheuser-Busch InBev's
beer marketing is directed
to individuals of legal
drinking age.**



3. Association with hazardous activities

- I. Our marketing materials or promotional activities will not portray the act of consumption immediately prior to activities (or in locations) that are potentially hazardous, such as driving a motor vehicle or operating other potentially dangerous equipment or machinery.
- II. Success in a potentially hazardous activity shall not be portrayed as depending on the consumption of our beer. It is, however, acceptable to show a participant enjoying our beer in a relaxing, celebratory or team way after the event.
- III. AB InBev staff in charge of AB InBev-sponsored promotional events will be encouraged to promote alternative transport means for the participants to return home safely. This could be through cooperation with local taxi cab companies or local city authorities to guarantee easy access to safe transport.

- IV. When the consumption of alcohol-free or non-alcohol beer entails no greater risk with potentially hazardous activities, these occasions may be portrayed in our advertising. In this case, we will take extra care to make the absence of alcohol clear so that the product cannot be mistaken for a beer that contains alcohol.

4. Health or functional benefits

We believe that when consumed responsibly, beer can be a part of a balanced and healthy lifestyle for most people. However, in terms of promoting our brands:

- I. We will not promote our beer in a way that claims it can prevent, treat or cure medical conditions.
- II. We do not market or advertise on the basis that consumption of our products provides certain health benefits.



- III. Any commercial communications on specific ingredients will comply with the law of the country where the communication is made.
- IV. We will not claim an energy benefit when marketing our beers – unless they contain no alcohol.
- V. If we make health or functional benefit claims for one of our alcohol-free brands, it has to be clearly recognizable as alcohol-free.

5. Alcohol content

- I. Our marketing materials or promotional activities should not create any confusion as to the alcohol strength of our products.
- II. We will not use high alcohol strength as a positive quality for our brands.

6. Performance & Success

Responsible beer consumption is associated with pleasurable social experiences and social ties, and can be portrayed as such. However, in terms of promoting our brands:

- I. Our commercial communications will not imply that consumption of beer is a requirement for social acceptance or professional, educational or financial success.
- II. Our commercial communications will not suggest that the consumption of our products enhances sexual capabilities, attractiveness or leads to sexual relations.
- III. Our commercial communications will not create the impression of a link between the consumption of our products and success/performance when engaging in sports or potentially hazardous activities.



Compliance with the Code

Compliance with the Code is mandatory for all our operations. Where national laws, regulations or self-regulatory Codes already exist, these must be respected in addition to the criteria set out in the AB InBev Code.

We strongly believe in a robust compliance program and internal review process.

1. Compliance with the Code is everyone's responsibility. The decision-making power will lie with the head of marketing in the case of local commercial communications and marketing activities. In the case of global commercial communications and marketing activities, the responsibility for compliance with the Code lies with the Global Brands Vice President.
2. In order to ensure practical compliance:
 - a. All in-house marketing, media buying, promotions and sponsorship teams, as well as external advertising, design, promotional and events teams shall follow both the letter and the spirit of the AB InBev Code.
 - b. All AB InBev written contracts and project briefs with all suppliers involved in AB InBev commercial communications will include an understanding that it is obligatory to abide by the Code. A copy of the Code must be attached to such contracts.

- c. All of AB InBev's advertising agencies will be included in electronic trainings on the Code, and key agencies will take part in the annual training of our marketing teams in the different markets.
- d. Pre-clearance and guidance on compliance with the Code must be sought and should take place as early as possible in the creative process for the development of marketing and promotional materials/communications. A tailored explanation of the pre-clearance process, which includes the appropriate contacts, will be available for each country.
- e. All existing and newly recruited commercial operations personnel (including promotions and sales staff) must be trained on, and agree to comply with the Code. For this purpose, a training package is available. The training package must also be conveyed to existing agencies and consultants when they are retained.

15 October 2009

Budweiser



**Compliance with
the Code is mandatory
for all our operations.**

The Great American Lager

Annex I

Guidelines for application of the Commercial Communications Code to digital marketing communications

Introduction

These guidelines are a part of Anheuser-Busch InBev's Commercial Communications Code and should be read in conjunction with the Commercial Communications Code. The Code covers all of our company's commercial communications, regardless of the media they are conveyed by.

The guidelines are regularly reviewed and updated to help AB InBev remain at the forefront of self-regulation and responsible marketing in this area.

We will apply the law and self-regulatory rules applicable to the country of the target audience for our digital media.

I. All principles of our Commercial Communications Code are applicable to digital media

Every time a communication that is under the control of AB InBev and that is designed to promote AB InBev's products appears on the digital media, the general principle and the six specific principles of the Commercial Communications Code are applicable.

In particular, the Code's principles are applicable to (amongst others):

- AB InBev owned brand websites
- paid search
- display ads (moving & non-moving)
- interactive TV ('red button')
- online 'public' classified (i.e. not placed by private individuals)
- SMS & MMS messages on mobile phones
- AB InBev-written/-endorsed product reviews
- in-game advertising
- AB InBev endorsed user-generated content
- viral advertising
- social media brand pages or channels
- social media & mobile applications

The Code's principles do not apply to:

- communications that are beyond AB InBev's control. Communications are deemed beyond our control when AB InBev was neither involved in the creation, nor in the distribution of some or all of the content and if it did not officially endorse the content. For example: messages posted by consumers in chat rooms or on message boards when AB InBev has no connection with the poster, nor with the platform used for the posting; videos posted on YouTube by somebody who has no connection to AB InBev; or blogs that are not owned or controlled by AB InBev.
- any form of editorial content (including annual reports, financial information, CSR reports, etc.); our corporate website insofar as it communicates about AB InBev and not about our brands.



II. Ensuring we target people above the legal drinking age in the digital media

1. We will ensure that all **AB InBev brand marketing websites** clearly state that access is restricted to those of the legal drinking age (in the country of consumer access). The website shall be set up to deny access to those who enter a date of birth that is under the legal drinking age unless it forms part of a platform that is restricted to registered users who are of legal drinking age in the country where the content is intended.
2. We will send emails or other **relationship marketing outreach** only to individuals of legal drinking age and older.
 - a. Mobile device communication including Bluetooth technology and other relationship marketing tools such as send-to-a-friend and e-cards must either be sent only to individuals who are affirmed over legal drinking age or must include an age-affirmation mechanisms for the recipient or a reminder to the sender to send only to those of legal drinking age.
 - b. In the case of viral advertising, all ads must include a responsibility reminder stating to only forward the content to those of legal drinking age.
3. We only place brand communications **on third-party websites** where at least 70% of the visitors to that website are expected to be above legal drinking age in the country where the content is intended.

Where a third-party website is not expected to meet the 70% requirement but where the dissemination of a placement on that website is restricted to only registered users of that website who are of legal drinking age in the country where the content is intended, such placement will be deemed compliant with this Code.
4. The **content** of our digital marketing communications should be such that it does not primarily appeal to people below the legal drinking age.
5. **Downloadable applications** including games, quizzes and widgets are acceptable so long as they avoid primary appeal to those below legal drinking age and include an age affirmation mechanism if the downloader's age has not been verified.
 - a. Downloadable applications must be placed on websites where at least 70% of visitors are of legal drinking age or above in the country for which the content is intended.
 - b. In the case of viral advertising, all ads must include a responsibility reminder stating to only forward the content to those of legal drinking age.

III. User-generated content


1. User-generated content (UGC) created by consumers may include text, video, photographic submissions by users to message boards, blogs, photo/video-sharing websites, social network sites and any other interactive websites. If these channels are wholly or partly controlled by AB InBev, we will ensure **post- or pre-monitoring** of this content to ensure it is appropriate and complies with our Commercial Communications Code.
2. We want to be **transparent about the nature of our commercial communications** and should not misrepresent their true purpose. Even when our marketing communications use elements of UGC, the commercial nature of the communication should remain apparent. Therefore our marketing communications should not be presented as user-generated content when that is not the case; this includes youtube videos, buzz marketing techniques, blogging site participation, etc.
3. Anyone who **communicates on AB InBev's behalf** (e.g. twitters, bloggers, facebook administrators...) needs to have received training on the Commercial Communications Code and abide by its principles.
2. Any type of relationship marketing AB InBev uses is **permission-based**, meaning that we require recipients of marketing emails and mobile messages to opt-in beforehand to receive such messages and we provide an opt-out function which easily allows consumers to stop receiving communications from us.
3. At the different points where AB InBev might collect data for relationship marketing purposes, we alert the users and encourage them to **find out how the information will be used**, as well as giving consumers the choice to opt-out of the data processing. We will provide reasonable security for, and limited retention of, the data collected.
4. If we collect **'clickstream' data** for behavioural advertising to our web site visitors, we will alert the users to this and we will give them the opportunity to opt out.

V. We support the Global principles for self-regulation of online behavioural advertising of the World Federation of Advertisers

As a member of the World Federation of Advertisers (WFA), Anheuser-Busch InBev is a signatory to the WFA Global Principles for self-regulation of online behavioural advertising.

IV. We safeguard the privacy of the consumer

1. We respect strict rules about the **use of consumers' online data** for marketing and have clear data privacy statements that we encourage our consumers to read.
- We support the development of industry self-regulatory schemes for online behavioural advertising on the basis of these Global Principles. To this effect, we will contribute to raising our advertising partners' attention to the importance we attach to self-regulation in this field and to the WFA Global Principles, which we will share with our partners.

A close-up photograph of a hand holding a Leffe beer glass. The glass is filled with a dark beer topped with a thick head of foam. The Leffe logo, featuring a castle and the word 'Leffe' in a gothic font, is visible on the glass. In the background, an open book is visible, suggesting a setting of study or reading. The lighting is warm and focused on the glass and book.

**We respect strict rules
about the use of consumers'
online data.**

Annex II

Guidelines for product placement of Anheuser-Busch InBev brands

Introduction

With product placement, we mean the process whereby AB InBev exchanges value in order for its products to be prominently displayed in a movie, television show or other media production.

All product placement in motion pictures, television shows, videos and stage plays must comply with the principles of the Commercial Communications Code to ensure that AB InBev's positions on responsible drinking are not misrepresented. Permission for the proposed use of the AB InBev product placement will be granted or denied based on compliance with the Code.

AB InBev acknowledges that motion picture, television, video and stage play producers frequently portray realistic scenes in their productions, which may use one or more AB InBev products without express permission from AB InBev. These instances, as they are neither rewarded nor given permission for by AB InBev, are not covered by the Commercial Communications Code.

Responsible drinking

AB InBev does not want its products to be abused, and it has spent millions of dollars annually to help prevent alcohol abuse. We will not grant permission for its products or other properties to be used in a way that, in its judgment, would misrepresent the company's position on responsible drinking. Specifically, we will not grant permission to use our products or properties if:

1. A character's drinking is not, in our judgment, appropriate, legal or responsible.
2. Alcoholism, illegal underage drinking, public drunkenness, drunk driving, or other abuse of alcohol is portrayed.

Age/minors

AB InBev does not intend for its beers to be purchased or consumed by people below the legal drinking age and has instigated or participated in numerous programs to help prevent underage drinking.

Consistent with this commitment, AB InBev will not grant permission for its products or properties to be used in a way that, in its judgment, would misrepresent its position on this issue.

Specifically, we will not allow product placement if:

1. A character under the legal purchase age is depicted purchasing or drinking alcohol illegally.
2. The motion picture or television show is one for which the majority of the audience is reasonably expected to be below the legal purchase age.
3. The proposed use in any way might misrepresent AB InBev's commitment help prevent illegal underage drinking or might reasonably imply that AB InBev condones underage drinking.


The original Belgian wheat beer

Welcome to Hoegaarden



Thank you
for living
our Code.

SINCE 1445
hoegaarden.com



For any further questions concerning Anheuser-Busch
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