



# CODE OF CONDUCT AND ETHICS

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# Table of Contents

<b>Business the Right Way</b> .....	4	<b>Major Incidents</b> .....	22
<b>Global and Regional Risk and Compliance Governance Structure</b> .....	5	<b>Other Policies and Expectations</b> .....	23
<b>Worldwide Systems for Raising Concerns</b> .....	6	Protection of Our Assets.....	23
Compliance and Reporting		Privacy Laws and Protection of Personal Information.....	23
Confidentiality		Lawsuits and Investigations.....	24
Reporting Ethics and Compliance Concerns		Government and Other Investigations.....	24
<b>Brand Ambassadors, Alcohol Issues and Marketing Ethics</b> .....	7	Political Activity.....	24
Brand Ambassadors		Confidential Information.....	24
Alcohol Consumption Policy		Record Retention Manual.....	25
Marketing Leadership		Sales Incentive Programs.....	25
<b>Beverage Alcohol Laws</b> .....	8	Customer Protection Laws.....	25
<b>Competition Law</b> .....	9	Export Control Laws.....	26
Antitrust and Competition Laws		<b>Electronic Equipment and Communications</b> .....	27
<b>Bribery and Corruption</b> .....	10	<b>MONOZUKURI and Quality from Seed to Sip</b> .....	28
Special Actions Regarding Third Parties.....	11	<b>Employee Responsibility</b> .....	29
Commercial Bribery.....	12	Interpretation	
<b>Money Laundering</b> .....	13	Disciplinary Action	
<b>Gifts and Entertainment</b> .....	14	<b>Appendix A — Risk and Compliance Committee Membership</b> .....	30
<b>Charitable Giving and Donations</b> .....	15	Global Risk and Compliance Committee.....	30
<b>Books and Records</b> .....	16	Regional Risk and Compliance Committee.....	31
<b>Global Citizenship</b> .....	17	<b>Appendix B — Reporting Hotline Instructions</b> .....	32
<b>Use of Natural Resources</b> .....	18	<b>Appendix C — Marketing Code of Practice</b> .....	33
<b>Fair Employment and Fair Dealing</b> .....	19	Table of Contents.....	34
Harrasment.....	19	Introduction.....	34
Immigration and Work Eligibility.....	19	Purpose of Code.....	34
Other Employment.....	19	Scope.....	35
Drug-Free Workplace.....	20	Core Principles.....	35
Fair Dealing.....	20	Contact Information.....	39
Conflicts of Interests.....	21		



## Business the Right Way – The Beam Suntory Way

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Beam Suntory Global Colleagues:

I want to thank each of you for the work you've done to enable our global outperformance since we became Beam Suntory. Because of your efforts, we've dynamically executed our Vision Into Action growth strategy. We've also deepened our commitment to Growing for Good, protecting the quality of water for future generations, supporting the communities where we do business, and promoting responsible consumption of our products. And we continue to gain inspiration from Suntory's Monozukuri values, as we pursue high quality at every step of the value chain, from seed to sip.

We have many exciting opportunities ahead, and naturally with opportunity comes challenge and risk. How we collectively address our opportunities and risks is critical, as we all have a role to play in shaping our Company's future as a leader in our industry.

Beam Suntory is built on a strong foundation rooted in common values, a commitment to quality and a passion to win.

The Beam Suntory Code of Conduct outlines our approach to business – honest, fair, competitive and focused always on doing things the right way – the Beam Suntory Way. Sometimes that will require tough decisions on priorities. It means always making good decisions, managing risk in our business, and executing our decisions within legal and ethical requirements.

Managers are responsible for creating an environment where open discussion about areas of concern is encouraged. We all benefit from the advice and counsel of our co-workers and experts within the Company when questions arise.

This Code outlines key topics and provides information on how to address a variety of situations. All employees are encouraged to review this Code and develop an understanding of how the principles and guidelines relate to their daily job responsibilities.

I call upon each of us to do our part as we drive our Vision Into Action growth strategy to take our Company to new levels of success – the right way, the Beam Suntory Way.

Best regards,  
Albert

## Global and Regional Risk and Compliance Governance Structure



Beam Suntory's corporate governance and management is overseen by its Board of Directors, which provides strategic vision and direction as to how the Company should grow while operating ethically and with integrity. The Board is also held answerable to stakeholders, including our parent company and regulators.

The Chairman and CEO chairs the Global Risk and Compliance Committee (GRCC), which provides Beam Suntory overall direction in embedding risk management into its short and long-term objectives. The GRCC is supported by regional committees (RRCC), which are responsible for providing their respective regions with leadership, consultative guidance, and direction on risk and control areas. The RRCCs are also responsible for implementing policies and initiatives that ensure business is being done the right way, while supporting Beam Suntory's Vision Into Action growth strategy.

See Appendix A for members of the Global and Regional Risk and Compliance Committees. Employees may contact any of the committee members, or any member of management at any Beam Suntory location, to share any information or concerns about Beam Suntory's operations and compliance.

# Speak Up! Worldwide System for Raising Concerns About Business Practices

## COMPLIANCE AND REPORTING:

Beam Suntory employees have the right and the responsibility to take an active role in detecting and preventing misconduct.

**What:** If any Beam Suntory employee believes that another Beam Suntory employee, including any manager, any member of senior management or an employee of any Beam Suntory subsidiary or joint venture– or a third-party agent– has or may violate the letter or spirit of the law or the standards outlined in this Code, they are **required** to report such activity.

Misconduct and concerns can be reported to:

1. The Global reporting hotline listed in Appendix B
2. Any member of the Global Risk and Compliance Committee
3. Any member of a Regional Risk and Compliance Committee
4. Any member of management

Beam Suntory prohibits retaliation against anyone who makes a good faith effort report of a known or suspected violation.

Employees will not be terminated for refusing a request or directive they reasonably believe would violate the law or this Code.

## CONFIDENTIALITY:

Information from employees will be kept confidential to the extent possible and in compliance with applicable personal privacy laws, while still allowing appropriate investigation by the Company.

Concerns and questions from employees may be directed to any member of the Global or Regional Risk and Compliance Committees. **Matters may also be reported anonymously through the reporting Hotline 24 hours a day:**

### Reporting Ethics and Compliance Concerns:

For employees in the U.S. and Canada, dial toll-free 1-800-374-6129.

For employees outside the U.S., see Appendix B for international dialing instructions.

All employees may also report online at <https://beamsuntory.ethicspoint.com>

# Brand Ambassadors, Alcohol Issues and Marketing Ethics

## BRAND AMBASSADORS

Every employee in every corner of the world reflects on Beam Suntory. We are all ambassadors for our Company's products and reputation, and we are expected to act that way at all times. We take a very firm view on alcohol issues including excessive consumption, underage drinking, impaired driving and responsible marketing. We expect that all employees will model desired behaviors, and avoid the consequences of abusive behaviors such as excessive consumption and impaired driving.

We anticipate that all employees will conduct themselves as representatives of Beam Suntory in any situation where alcohol is consumed.

Our policy on underage drinking, impaired driving and excessive consumption is clear:

### **Policy on Underage Drinking, Impaired Driving and Excessive Consumption**

Beam Suntory and its subsidiaries and affiliates make alcohol beverages only for adults of legal purchase age (LPA), as LPA is defined in each market. We actively support all laws establishing age restrictions on access to, purchase of and consumption of alcohol beverages, and we devote substantial resources to education and prevention of illegal underage drinking and impaired driving.

Our products are intended to be consumed responsibly for enjoyment by LPA adults and we do not market our products to persons below the LPA. We oppose all forms of illegal, excessive or irresponsible consumption and we vigorously support enforcement of impaired driving laws. We recognize some people should not drink alcohol beverages at all, and we do not market to those people. We also respect the choice of anyone who chooses not to drink.

## MARKETING LEADERSHIP

Beam Suntory is determined to be a leader in responsible marketing and promotional practices.

**Our Goal:** Set the standard for tasteful, relevant and responsible marketing and advertising to LPA adults who choose to drink.

**Our Approach:** A single objective for our sales, marketing, promotion and advertising – to grow our business through tasteful, relevant materials that speak to our target audience of LPA adults. The LPA may vary by markets, but our requirements will not – we will utilize only those materials and services that speak responsibly to LPA consumers in each of our markets.

**Our Role:** Through effective self-regulation – internal policing of our own practices – we can ensure our goal is met. We comply strictly with all laws and regulations and industry codes of practice that apply to our business. The Beam Suntory Marketing Code of Practice establish additional policies and practices to confirm our responsible approach to marketing alcohol beverages. We collaborate in enforcing industry codes and participate in industry associations that further these goals.

**Our Guidelines:** All employees must review and adhere to the Beam Suntory Marketing Code of Practice regarding responsible and tasteful advertising and promotional practices. See Appendix C.

**Our Position:** Impaired driving is irresponsible, illegal and unacceptable behavior. We expect all employees to comply with all impaired driving laws while conducting Company business. There will be employment consequences, which may include termination for employees who drive in violation of the law.



# Beverage Alcohol Laws

**Beam Suntory's ability to do business is governed by regional/national and local laws that include the following:**

1. In most countries, Beam Suntory Companies cannot make or sell distilled spirits without an umbrella license or permit that authorizes production and sales activities. **Loss of that umbrella permit would put us out of business in that country.** All Beam Suntory employees must ensure their actions are consistent with all legal requirements and do not threaten Beam Suntory's key licenses and permits.
2. Most markets establish restrictions on Beam Suntory's interactions with distributors and retail customers. Tied-house, commercial bribery or similar **rules may prohibit actions that result in inducement, or exclusion of any other supplier's products.** Practices that are common in other industries – gifts of merchandise, gift certificates, trips, etc., and other inducements to distributors and retailers – can be questionable under local rules and should be checked with the Legal Department.
3. Actions that result in inducement, or exclusion of another supplier's products, by **giving any "thing of value" directly to any employee of a wholesale or retail customer can be a problem.** What this means in practice is not always clear. In some jurisdictions things like free trips for trade buyer representatives in connection with sales promotions, gifts to buyers rewarding successful merchandising, and making certain contributions to trade associations, etc. can be problematic. On the other hand, unless prohibited by national or local regulation, common practices like moderately priced business meals and entertainment are generally not illegal.
4. The laws in many countries, including the U.S., **restrict or prohibit sales activities in our spirits industry that are common in other industries.** For example, in certain countries, **Beam Suntory cannot pay a retailer for placing products on retail shelves, offer co-op advertising or reimburse wholesalers or retailers for advertising Beam Suntory products.**

Given the unique history of alcohol, including Prohibition in the U.S., many markets have **regulations prohibiting activities by Beam Suntory that may be permissible in other industries**, such as consignment sales, shelf payments and co-op advertising.



# Competition Law

## ANTITRUST AND COMPETITION LAWS

Antitrust laws foster competition and a free and open market for goods and services. **These laws prohibit restraints of trade, including, any agreement or understanding between Beam Suntory and any competitors:**

- 1. To raise, lower, stabilize or otherwise fix or control prices**
- 2. To restrict the volume of goods to be produced or made available for sale**
- 3. To allocate territories, markets or products**
- 4. To boycott particular suppliers or customers**

If any competitor raises these issues, walk away and report to any reporting contact. Beware of oral contracts or other actions that might be misinterpreted to be agreement to the prohibited actions above.

Regional variations on the general principles above must be strictly complied with. For example, TFEU Articles 101 and 102 in the European Union **prohibit activities that restrict the free flow of goods between member states of the European Union.** Because questions under the antitrust laws can be complex, it is essential that employees consult with the Legal Department on competition law matters. The possible penalties for antitrust violations are severe and include civil and criminal penalties, imprisonment, fines and injunctions.

## Q&A

**Q:** I work in Sales and recently a friendly customer gave me a competitor's price list. The information is very helpful but I feel uncomfortable having this in my possession. I haven't told my boss I have it. What should I do?

**A:** Call your local Legal Department contact ASAP. Don't copy or distribute the price list, and don't take any commercial action on the basis of what you have seen. Legal will return the price list to the competitor, and manage any necessary communications or further action.



It may be unlawful under certain circumstances to discriminate in prices between competing customers for the same goods. Never coordinate or broker retail prices between retail customers. Avoid any contacts with competitors that violate competition laws.



**Beam Suntory will not tolerate any bribery or corruption in its business, or by third parties acting on the Company's behalf.**

U.S. and international regulations, including the Foreign Corrupt Practices Act (FCPA), Japan's Unfair Competition Prevention Law (UCPL), the OECD Convention, the UK Bribery Act, and other local laws prohibit bribing a government official.

A government official is a person who works for, or is an agent of, a government-owned or government-controlled entity. For purposes of anti-bribery laws, government officials include, but are not limited to:

- Elected and appointed officers or employees of national government
- Municipal or local governments, including individuals holding legislative, administrative and judicial positions
- Officials of political parties and candidates for political offices
- Employees of a government or a state-controlled company

Reference: Global Anti-Corruption Policy [!](#)

# Bribery and Corruption

## SPECIAL ACTIONS REGARDING THIRD PARTIES

Extra vigilance is needed regarding the actions of **third parties** acting on Beam Suntory's behalf. Under certain circumstances, Beam Suntory can be held liable for the actions of its third parties.

Consultants and third parties cannot do anything or take any action that would be prohibited if done directly by Beam Suntory. Beam Suntory's Third-Party Policy sets forth a program to evaluate third-party business partners to gain assurance that their activities do not expose Beam Suntory to undue compliance risk.

A business partner must undergo due diligence if it provides any of the following services in a country rated 69 or below on Transparency International's Corruption Perception Index.

- Represents Beam Suntory before government or regulatory entities or officials
- Assists Beam Suntory in obtaining permits, registrations and certifications
- Provides transportation, logistics and customs related services, or
- Distributes, promotes, markets and advertises our product

Please contact a member of the Global Compliance Team for further information regarding the policy and prior to executing an agreement with a third-party.

Not all government payments are problematic. For example, payments may be made to a government entity in the normal course of business, such as to pay taxes or when the government entity is a customer or supplier. However, any payment to an individual official is risky, particularly if the payment is discretionary, as it could be viewed as a bribe or kickback. Employees are not permitted to provide facilitation payments to government officials to expedite or ensure routine actions –such as issuing licenses, permits or visas.

All transactions must be accurately recorded in the correct Company's books and records.



# Bribery and Corruption



## Interacting with Government Officials – Do's and Don'ts

### Do:

- Take extra care when dealing with any **government official**, foreign political party or its officials, or candidate for public office.
- Maintain books and records that accurately reflect all Company transactions and assets.

### Don't:

- Offer or pay any money or other thing of value for the purpose of **improperly obtaining or maintaining business** or influencing governmental action favorable to Beam Suntory.
- Engage **consultants or other third parties to undertake any action that would be prohibited if done directly by Beam Suntory.**
- Utilize **prohibited transactions**, such as, split invoicing that enable a customer to pay a lower import duty, as well as over-invoicing to enable a customer to take payment outside of his or her own country and thus avoid that country's currency export regulations.

These rules apply to all employees and agents of Beam Suntory and its affiliates, whether foreign or domestic. If any employee believes that such payments have been or are being made by one of Beam Suntory's foreign affiliates, agents, consultants, or business partners, it should immediately be reported to the Legal Department.

## COMMERCIAL BRIBERY

Globally, there are many laws that prohibit the payment of bribes, kickbacks or other illegal payments to Beam Suntory's customers by Beam Suntory or any third-party. Employees may not make any payment to or give any gift or other item of value – including Company products – directly or indirectly, to any customer or supplier of Beam Suntory, or any government agent working on Beam Suntory matters, except that **gifts or entertainment may be given to representatives of customers or potential customers if they comply with the provisions of our Global Gifts & Hospitality Policy or its local addendum.**s

## Q&A

**Q:** In my market it is customary to provide buyers and other contacts some of our finer Beam Suntory products as gifts around the holidays. Can I continue?

**A:** A single bottle is unlikely to raise problems but the rules are complex **and risks of free products are high, especially with any government contact. Consult the Legal Department.**

**Q:** I want to set up a distributor and retailer reward program — the more they sell, the bigger the reward. What do I need to know?

**A:** Many markets have a **thing of value rule** that will come into play. Subject to local rules, this may be feasible but ensure all requirements are met by consulting the Legal Department.



# Money Laundering

Beam Suntory complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. **Money laundering** is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. Beam Suntory needs to take sufficient steps to ensure it is not accepting illegally obtained funds and violating money-laundering laws. **Beam Suntory could be held responsible as a seller who has unknowingly facilitated money laundering.**

Employees should always ensure that business is conducted with reputable customers, for legitimate business purposes with legitimate funds. It is especially important for employees in roles involving the selection or screening of customers, or other third parties.

Beam Suntory will not accept payment in any form that would disguise the nature, location, source, ownership or control of the proceeds of an illegal activity or to avoid a reporting requirement. Nor will Beam Suntory make payments to an entity other than the one with whom it has contracted for goods or services. Any exceptions to this policy should be discussed with the Legal Department.

Reference: Anti-Money Laundering Policy



## How is money laundered?

For example,

- A person illegally sells drugs in exchange for cash.
- He then uses that cash to purchase consumer goods from a seller (e.g. store).
- The illegally obtained cash passes into the hands of the seller and into the legitimate economic system – original, illegal source of money is disguised.
- The money launderer then resells his store-bought consumer goods and deposits the proceeds of this second sale into his bank account.
- He is then able to access that cash from a legitimate banking system.

# Gifts and Entertainment

Beam Suntory strives to build healthy, lasting relationships with all its business partners. A common manner of fostering good business relationships is through the exchange of gifts and entertainment. However, this practice can easily lead to a conflict of interest, or the appearance of one, if certain guidelines are not followed when giving or accepting gifts, favors, or entertainment.

Gifts, whether given or received, must be:

- Nominal in value (\$100 USD or less)
- Infrequent
- In good taste
- Unsolicited
- Of the type customarily offered to others having a similar relationship
- Not cash or cash equivalents, such as gift cards
- In compliance with applicable laws and regulations

When giving or receiving gifts or offers of entertainment that meet these criteria, employees are expected to avoid creating the appearance of bias.

Reference: Global Gifts & Hospitalities Policy and its local addendums.

## Q&A

**Q:** In my country, it's customary to give red packets containing cash during holidays and special occasions. Is it ok to give or receive these red packets?

**A:** Please refer to the South East Asia gift policy addendum for specific guidelines and authorization approvals. Please reach out to the Legal Department for additional information.



### PERMISSIBLE GIFTS AND ENTERTAINMENT

- The gift or entertainment is **legal**.
- The gift or entertainment is **not cash** or a cash equivalent.
- The gift or entertainment is of a **nominal value** such that it cannot be construed as a bribe, payoff or other attempt to procure business by any reasonable person applying normal, generally accepted standards of business ethics.
- Public disclosure of such gift or entertainment would **not in any sense be an embarrassment to Beam Suntory**.
- The gift or entertainment **was not given in exchange** or in anticipation of a specific service or outcome concerning the Company.
- The recipient's employer is aware of the gift or entertainment.

Reference: Global Gifts & Hospitalities Policy or its local addendum, T&E Policy.

## Charitable Giving and Donations

As part of our culture of corporate social responsibility, Beam Suntory seeks to give back to the communities in which we conduct business.

While it is important to be a good corporate citizen, it is equally important to make sure that charitable giving is done responsibly. Given the potential risk for misuse, we must balance the need between charitable giving and complying with applicable laws and regulations.

All charitable contributions must be:

- To a legitimate charitable organization, such as the International Red Cross
- Reasonable in nature and appropriate to support the stated needs of the activity or project
- Proper under the circumstances (for example, the contribution does not raise questions from a reputational risk perspective)
- Lawful under all applicable laws, regulations and rules
- Given openly and transparently with no appearance of impropriety
- Given without expectation of reciprocity, obligation, favor or action in return
- Accurately recorded in the Company's books and records

Reference: Charitable Giving Policy



## Books and Records; Accounting Practices and Financial Records

Beam Suntory's financial statements and all books and records on which they are based must be **complete, accurate and reflect the true state of our business** – even when records disclose disappointing results or a failure to meet anticipated performance goals.

Any attempt to mask, hide or minimize actual results by inaccurately reflecting costs, inventory values, sales, etc., will not be tolerated.

Employees in management and in financial reporting functions are required to cooperate in and deliver **accurate and complete certifications** regarding integrity of financial statements. Refusal to cooperate or any attempt to provide false certification may result in discipline up to and including termination for cause.



All financial reporting and accounting regulations and standards must be strictly followed. If any Beam Suntory employee has concerns or complaints regarding Beam Suntory accounting, record keeping, or reporting practices, those concerns or complaints should be reported via the reporting hotline phone numbers in **Appendix B** or to the Legal Department

Reference: Global Controller Accounting Policies.

59	7.10%	€556.00	-\$90.30	--	\$1,580.00	17.11.2017
43	5.23%	€331.20	€55.10	1.50	€1,569.30	24.11.2017
34	9.34%	£550.33	£77.20	0.00	-\$2,849.50	01.12.2017
00	10.63%	-\$609.10	-\$10.50	0.00	-€990.50	08.12.2017
42	2.34%	-€270.70	\$161.00	4.00	\$1,392.00	15.12.2017
12	1.67%	\$200.30	-£50.70	1.50	\$903.00	22.12.2017
03	12.94%	\$54.90	£75.30	--	£2,300.00	29.12.2017
07	4.01%	-€723.00	-€137.99	--	-\$1,090.00	05.01.2018
25	5.93%	-\$150.00	€69.20	--	-€1,750.30	12.01.2018
23	15.34%	-£40.62	\$44.20	--	-€990.30	19.01.2018
03	11.63%	€170.00	-\$90.30	0.00	£1,523.40	26.01.2018
50	1.90%	\$259.11	-€15.50	1.00	\$1,903.40	02.02.2018
	2.11%	€99.23	€96.30	3.50	-€2,349.50	09.02.2018
					£7,034.20	



# Global Citizenship

At Beam Suntory, corporate values are an essential element of continuing success in the marketplace. These values – integrity, leadership, teamwork and accountability – are vital to the success of the Company. The Company's corporate success is dependent on our reputation with our co-workers, suppliers, investors and the communities where we work and live.

Beam Suntory's Global Citizenship Policy support our corporate values by providing guidelines to ensure that the Company and its employees respect human rights, workplace safety and protection of the environment in every community where the Company is located. Beam Suntory expects the same of our Company's suppliers and contractors so that we demonstrate our leadership within the business community together. Further, we enhance each of our brands, improve our ability to attract and retain the best talent, and provide better supply chain management and performance.

Beam Suntory Global Citizenship Policy Elements:

- Working Conditions/Health and Safety
- Child Labor
- Forced Labor
- Discrimination
- Working Hours
- Wages and Benefits
- Environment
- Management Systems
- Suppliers and Contractors

For more information about any of these areas, please review the Global Citizenship Policy.





## Use of Natural Resources

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Every employee is responsible for furthering Beam Suntory’s policy to prevent harm to the public health and the environment through strict compliance with all applicable environmental laws and regulations. Regional/national, state and local environmental protection laws and regulations govern nearly every aspect of our business operations, especially those causing emissions to air, land or water. All necessary action must be taken to comply with these laws. In addition, all Beam Suntory employees are urged to do their part in protecting the environment by conserving natural resources, recycling and reusing materials.

Additionally, good corporate citizenship and social responsibility are central to Beam Suntory’s business and fundamental to its culture. The Company focuses on protecting water and the environment through work such as establishing natural water sanctuaries to secure sustainable, high-quality water sources for Beam Suntory products. The Company invests time, resources and energy in fulfilling these commitments — not just because it’s the right thing to do, but because these efforts help define Beam Suntory’s character and amplify the passion of its people. The “Growing for Good” vision has been inspired by Suntory Holdings’ leadership in this area, and its commitment to passing down a sustainable society for future generations.

# Fair Employment and Fair Dealing

## HARASSMENT

Employees must conduct themselves with the highest regard for the dignity of others, as outlined in Beam Suntory's Harassment Policy. **Beam Suntory will not tolerate harassing, intimidating or offensive behavior of any kind,** whether through unwelcome sexual advances, requests for sexual favors or any other verbal or physical conduct of a similar nature. Any confirmed harassment will result in discipline, up to and including termination for cause, depending on the circumstances. If any employee believes he or she is being harassed, immediately notify any member of Beam Suntory management or any Regional or Global Compliance Committee member, a local compliance or legal contact or the Human Resources Department. Such complaints will be promptly investigated, and such complaints and investigations will be kept confidential to the extent practical. For further information, review Beam Suntory's Harassment Policy.

## IMMIGRATION AND WORK ELIGIBILITY

Beam Suntory is committed to compliance with all immigration laws, including those regarding verification of employment eligibility as well as the prohibition of national origin discrimination. Beam Suntory will not knowingly employ an individual who lacks valid employment authorization under local regulations. Concerns in this area should be reported as described in this Code or to their manager or the Legal Department.

## OTHER EMPLOYMENT

Except as otherwise provided in the Conflicts of Interest Policy, Beam Suntory encourages community involvement, volunteering and other forms of giving back to our local communities. Outside noncommercial activities which have no impact on Beam Suntory's business or on an employee's ability to devote energies to Beam Suntory's business are generally considered to be an employee's personal affairs.





## Fair Employment and Fair Dealing

### DRUG-FREE WORKPLACE

Beam Suntory seeks to provide employees with a working environment that is safe and free from illegal drugs. Consistent with this commitment, the Company's Drug-Free Workplace Policy establishes its intent to maintain a drug-free workplace.

The use, sale, possession, distribution, manufacture or transfer of any illegal drug or controlled substance (as defined under federal, state/regional or local law), or abuse of any legal prescription drug, is prohibited at all times either on Company property or while engaged in Company business. Marijuana remains an illegal drug under U.S. federal law and under the Company policy, even if permitted under applicable state law.

All Beam Suntory employees are expected to strictly comply with this Company policy and to maintain a drug-free workplace. Violation of any provision of this policy may result in disciplinary action, up to and including termination of employment.

Reference: Drug-Free Workplace Policy

### FAIR DEALING

All employees are expected to deal fairly with Beam Suntory customers, suppliers, competitors, employees and labor union representatives. Employees **may not take unfair advantage of anyone** through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.





# Fair Employment and Fair Dealing

## CONFLICTS OF INTEREST

Employees must avoid situations that would **create a conflict between an employee's personal interests and Beam Suntory's business interests**. Consequently, employees are expected to avoid or, where appropriate, disclose situations that, because of some interest of an employee or of members of an employee's immediate family, could consciously or unconsciously **interfere with an employee's ability to represent Beam Suntory's best interests**. In circumstances in which a family member, relative or close personal friend is also a Beam Suntory employee, employees are expected to **avoid any conduct that might give the appearance of favoritism toward such individual**.

Any actual or potential conflict should be disclosed to the Legal Department.

Reference: Conflicts of Interest Policy

## Q&A

### Example 1

Two Beam Suntory employees are in a romantic relationship. Is this a problem?

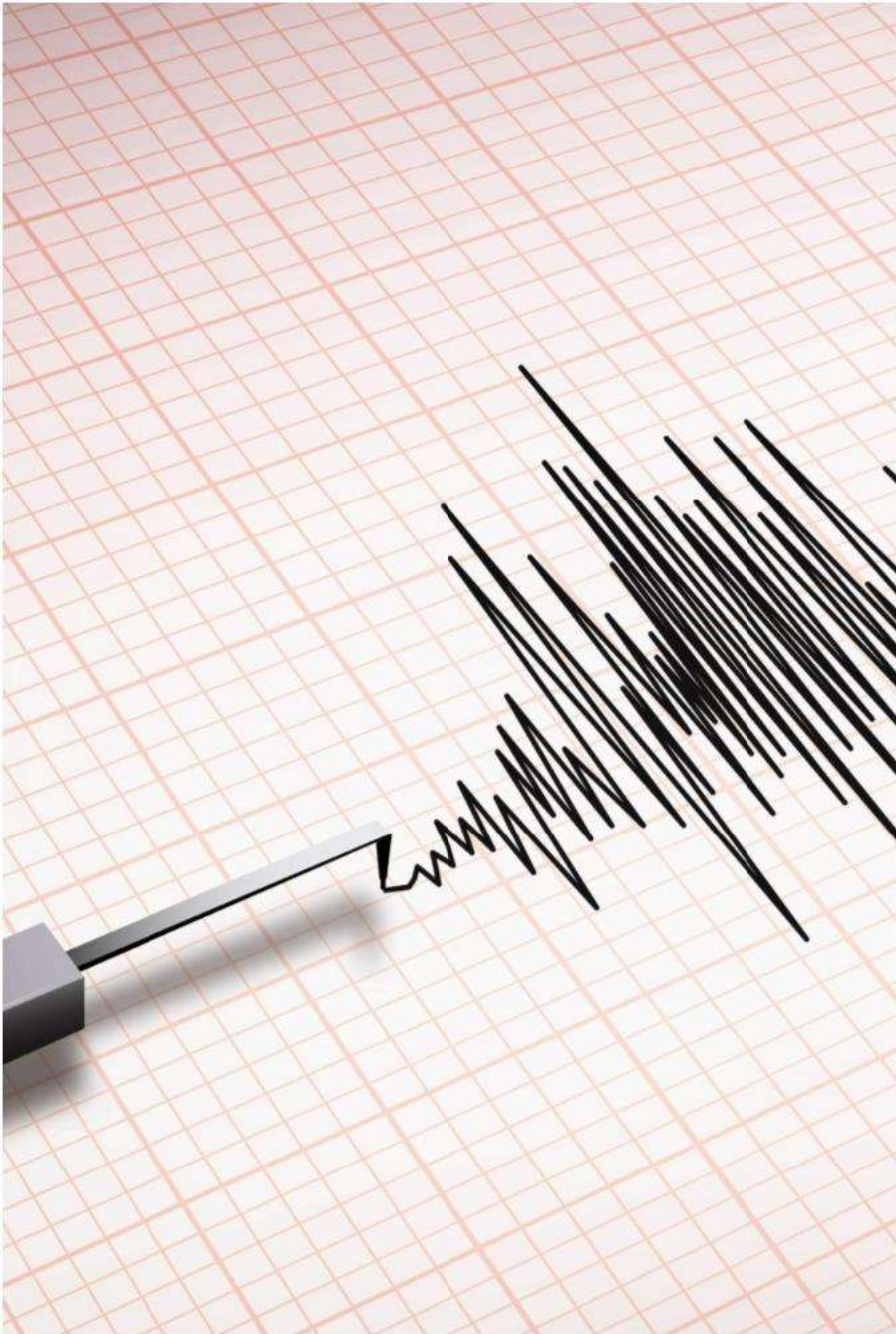
**Answer:** Individuals have certain privacy rights at work except where there may be a conflict of interest, or where an inappropriate relationship (for example, a romantic relationship between a manager and a direct report, or behaviors that put the Company at risk for harassment or a hostile work environment) is created. Any romantic relationship between a manager and a direct report must be brought to the attention of management. We understand that close relationships and friendships are formed in the workplace and we **welcome friends working together; so long as relationships remain professional at all times**. If the friendship/relationship proves problematic to the business, affects the morale of the team or puts the reputation of the Company at risk, appropriate action will be taken. In no event will harassment or any other improper discriminatory relationship be allowed to exist.

### Example 2

In my role at Beam Suntory, I'm responsible for procuring supplies and raw materials and, over time, have become very familiar with the various vendors we purchase from. Is it ok to review bids from businesses owned by friends or family members?

**Answer:** Procurement of goods and services should follow the process of obtaining at least three quotes and reviewing them to see which provider best fits Beam Suntory's interests. In this case, you must remove yourself, and allow an independent person to review the bids and follow our established process.

## Major Incidents



Beam Suntory has a process to manage major incidents that pose a potentially high risk to human health and safety, environment, property damage, supply interruption or the overall reputation of the Company. Examples of major incidents include:

- Food safety risks, serious quality concerns, product recalls
- Fire, explosion, natural disasters (flood, tornado, hurricane, etc.)
- Property damage, business continuity or supply interruption
- IT outage or loss of other core business support-function

If a major incident does occur, the priorities of the Company are to protect human health and safety, the environment and Company assets. Employees that identify a potential major incident **must immediately initiate the local emergency response notifications and procedures**. These are the reporting and emergency actions required for specific locations.

After the necessary local emergency response notifications and procedures have been initiated, the global major incident management notifications and procedures will be initiated. These reporting and emergency actions are required for all Beam Suntory locations.

Reference: Major Incident Management Policy

## Other Policies and Expectations

### PROTECTION AND PROPER USE OF BEAM SUNTORY ASSETS

Employees are obliged to protect Beam Suntory assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on Beam Suntory's profitability, and may be a basis for discipline up to and including termination. Beam Suntory assets, including internet access from Beam Suntory computer systems should be used only for legitimate business purposes.

### PRIVACY LAWS AND PROTECTION OF PERSONAL INFORMATION

All employees must comply with laws and regulations concerning the collection, use and distribution of personal information obtained from consumers. Each of us has a responsibility to ensure all personal data collected is processed lawfully, fairly and in a transparent manner.

This is especially true in the European Union where the General Data Protection Regulation (GDPR) provides specific protections relating to the processing, transmission and safekeeping of data for individuals.

Data protection laws are complex and evolving. Financial penalties and reputational impact to the Company for violations can be significant. You should always contact IT or the Legal Department if you have questions or concerns.





## Other Policies and Expectations

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### LAWSUITS AND INVESTIGATIONS

Employees should **advise the Legal Department immediately upon receipt of any summons, subpoena, interrogatories, inquiry or other communication from any court, government body or agent**, or from any lawyer for any private party or governmental agency. Before answering any questions about Beam Suntory's business, providing any document, or even responding to any requests made in connection with a dispute, litigation or an investigation, employees should consult with the Legal Department. Dawn raid guidelines should be followed as appropriate. **Coordination with the Legal Department is required in all matters in which Beam Suntory is involved directly**, such as an investigation of some aspect of our business or a lawsuit involving a Beam Suntory contract or product, and also to matters in which Beam Suntory is involved indirectly, including investigations or lawsuits against suppliers, distributors or competitors.

### GOVERNMENT AND OTHER INVESTIGATIONS

Government enforcement proceedings and other investigations, including civil litigation between private parties, are increasingly a fact of life. Governmental authorities have broad investigative powers. Beam Suntory cooperates fully in government proceedings and investigations. Employees are obligated to cooperate willingly in any litigation, government proceeding or investigation; failure to do so may result in adverse employment consequences, including termination.

### POLITICAL ACTIVITY

**Beam Suntory encourages employees to participate in the political process**, provided that these activities are on personal time, do not interfere with work and are not done in a context that identifies an employee's personal views as those of Beam Suntory. Beam Suntory will not pay or reimburse an employee for any political contributions. Employees **may not offer any gift or payment, directly or indirectly, to any governmental official or political party with the objective of procuring or maintaining business or influencing governmental action favorable to Beam Suntory**. These restrictions do not prohibit contributions to Beam Suntory's Political Action Committee (Beam Suntory PAC) and political activities officially sponsored by Beam Suntory. Eligible employees are encouraged to contribute to Beam Suntory PAC.

### CONFIDENTIAL INFORMATION

Employees may not publish, disclose or use for personal gain, either during or after their employment, any confidential information or trade secrets about Beam Suntory and its affiliates, its personnel or the parties with which it does business. Employees disclosing confidential information will be subject to discipline up to and including termination, and may be subject to civil or criminal penalties. Additionally, employees should not and are expected not to disclose or use any non-public, confidential information of prior employers or third parties to advance Beam Suntory's business.

## Other Policies and Expectations

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### RECORD RETENTION MANUAL

Record retention laws and policies must be observed by all employees. Company policy **prohibits employees from altering, destroying or concealing any record or document**, or attempting to do so, with the intent to impair the integrity or availability of that material. Beam Suntory prohibits any employee, director or agent from obstructing, influencing or impeding any official proceeding in any manner, or any attempt to do so. Failure to cooperate may result in adverse employment consequences, including termination.

Corporate documents and records including email and electronic documents and images **must be maintained and managed in accordance with Beam Suntory's Record Retention Manual**, and each employee's relevant departmental Record Retention Guidelines. Records which are no longer required under that Manual and Guideline are to be destroyed pursuant to that policy. Reference: Record Retention Manual

### SALES INCENTIVE PROGRAMS

Beam Suntory directly and through its distribution networks operates incentive programs to maintain and stimulate sales. These programs are **only permitted if conducted in compliance** with national, federal, local and state laws.

### CUSTOMER PROTECTION LAWS

Many jurisdictions have laws restricting how and **when we can terminate a customer**. Particular caution is needed to avoid any statement or writing that may allow a customer to assert that Beam Suntory promised an indefinite or continual relationship.



Employees who have any role in customer incentive programs are **expected to be familiar with and comply strictly with all legal requirements** and restrictions.

Distributor changes and route-to-market realignments **raise compliance and other risks**, so consult with the Legal Department.

## Other Policies and Expectations

### EXPORT CONTROL LAWS

Compliance with all applicable national and international export and import control laws is required in Beam Suntory operations. Under certain circumstances, U.S. “trading with the enemy” laws **prohibit Beam Suntory Companies, including those located outside the United States, from dealing directly or indirectly with businesses located in certain countries.**

These laws are often complex and can change quickly. The current list of countries subject to these restrictions can be found at:

[www.treasury.gov/resource-center/sanctions/pages/default.aspx](http://www.treasury.gov/resource-center/sanctions/pages/default.aspx)

Consult the Legal Department for guidance on the applicability of these laws for potential commercial activities.

Beverage alcohol products, like many other consumer goods products are sometimes imported into countries by third parties without full payment of taxes and duties. Employees of Beam Suntory must not promote this activity and should inquire with the Legal Department for guidance on tax and duty questions. Employees should inform the Legal Department of any request to participate in or support any economic boycott activities.





## Electronic Equipment and Communications

Company-provided computer and telephone equipment is Beam Suntory property, and is to be maintained and used only in compliance with the Beam Suntory End User Computing Policy. It is Beam Suntory's policy to strictly **comply with all computer software copyrights** and with the terms and conditions of all software licenses and relevant legal requirements. Failure to comply with licenses and Beam Suntory policies may result in discipline up to and including termination of employment.

Beam Suntory's Internet, intranet and email privileges, as well as computer systems and networks, are Beam Suntory property and are intended to be used for business purposes only. Employees may not use Beam Suntory equipment to post or disseminate statements, audio, video, pictures or other materials that constitute hate speech or could be considered offensive, malicious, obscene, harassing or threatening to any readers or viewers, including fellow employees. Employees may not use Beam Suntory equipment to knowingly download or distribute pirated software or data. Employees may not use Beam Suntory equipment to deliberately propagate any virus, worm, Trojan horse, or trap-door program code, or any other code, attachment, email, etc., which has malicious intent or which constitutes hate speech.

Employees are advised that they should have **no expectation of privacy regarding use of any information stored on or preserved by Company electronic devices**, except to the extent required under local privacy regulations. Employee postings on social media may be reviewed by the Company and may have employment consequences up to and including termination, depending on the circumstances.

Social media such as Facebook and Twitter are increasingly features of Beam Suntory's business. Good judgment and compliance with Beam Suntory's policies are required in use of social media on behalf of the Company. Employees who use social media for Beam Suntory's business should always identify themselves as Company representatives.

Reference: Social Media Policy



Where permitted under applicable local privacy regulations, Beam Suntory may periodically monitor use of Beam Suntory hardware and software, including the content of email, documents, telephone messages, images and graphics and Internet/Intranet. By using Beam Suntory equipment, each employee acknowledges to the extent allowed by applicable local law (1) that they have no reasonable expectation of privacy, (2) that they consent to monitoring of their use of Beam Suntory equipment without prior notice to the employee, and (3) that assignment of initial passwords by Beam Suntory for use of computer, telephone or other Beam Suntory equipment, and any subsequent changes of passwords by the employee, do not create an expectation of privacy or alter any of the employee's acknowledgements concerning monitoring by Beam Suntory.

Reference: Acceptable Use Policy

## MONOZUKURI and Quality from Seed to Sip



Beam Suntory is proud of our long tradition of providing outstanding quality products. Upholding commitment to quality and safety is paramount to earn consumers' trust and ensure they enjoy the best possible experience, while business partners market and distribute Beam Suntory brands with confidence.

The Company and all of its employees strive to create new value for our consumers while delivering safe, reliable and high-quality products. Through Beam Suntory's foundation, rooted in Suntory's MONOZUKURI Values, we are committed to enrich consumers' lives, providing MONOZUKURI and Quality from Seed to Sip. This commitment extends across the Company's value chain, including all consumer touchpoints.

To this end, the Company complies with applicable legislative and regulatory requirements throughout the development and production processes, and has the means to act quickly in the face of an adverse event.

Products delivered must meet all agreed specifications and technical requirements. Beam Suntory provides the required data to prove conformance to specification (e.g. certificates of analysis, routine test data) as requested by authorities.

# Employee Responsibility

## INTERPRETATION

This Code cannot address every issue that arises in our business, and there may be times when employees may be unsure about how or whether this Code or other Company policies apply. In such cases, or simply **to voice concerns or to ask questions, employees are encouraged to contact any manager or the Legal Department.**

## DISCIPLINARY ACTION

This Code is drafted broadly to give employees general guidance about Beam Suntory's objective to develop a sustainable business and exceed the minimum requirements of the law. Our goal is to operate under best practices when achievable and consistent with commercial goals. Beam Suntory will enforce this Code vigorously. A violation of this Code, a failure to report a violation or retaliation against an employee who, in good faith, reports a possible violation, could lead to discipline, including termination of employment for cause as well as, in some cases, civil and criminal liability. Although any employee who discloses his or her own misconduct may be subject to disciplinary action, Beam Suntory may consider such voluntary self-disclosure as a mitigating factor in assessing discipline.



Concerns and questions may be directed to any member of management, or any member of the Global Compliance team. **Matters may also be reported anonymously through the toll-free reporting hotline 24 hours a day as follows:**

**For employees in the U.S. and Canada:  
toll-free 1-800-374-6129**

**For employees outside the U.S. and Canada:  
see Appendix B – International instructions for using  
the Compliance Hotline**



## Appendix A – Risk and Compliance Committee Membership

<b>Global Risk and Compliance Committee</b> Employees may contact any office listed below, or any other member of management in any Beam Suntory location, to share information or concerns about Beam Suntory's operations and compliance.	
<b>CEO</b>	<b>CFO</b>
<b>Chief Human Resources Officer</b>	<b>SVP, Corporate Communications &amp; Public Affairs</b>
<b>General Counsel</b>	<b>Advisor to the CEO &amp; House of Suntory</b>
<b>Chief Supply Chain Officer</b>	<b>Chief Compliance Officer</b>
<b>VP, Internal Audit</b>	<b>President of Brands</b>

# Appendix A – Risk and Compliance Committee Membership

## Regional Risk and Compliance Committee\*

Employees may contact any office listed below, or any other member of management in any Beam Suntory location, to share information or concerns about Beam Suntory's operations and compliance.



\* Subject to updates based on business needs.

## Appendix B – Reporting Hotline Instructions

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**From U.S. and Canada: dial 1-800-374-6129**

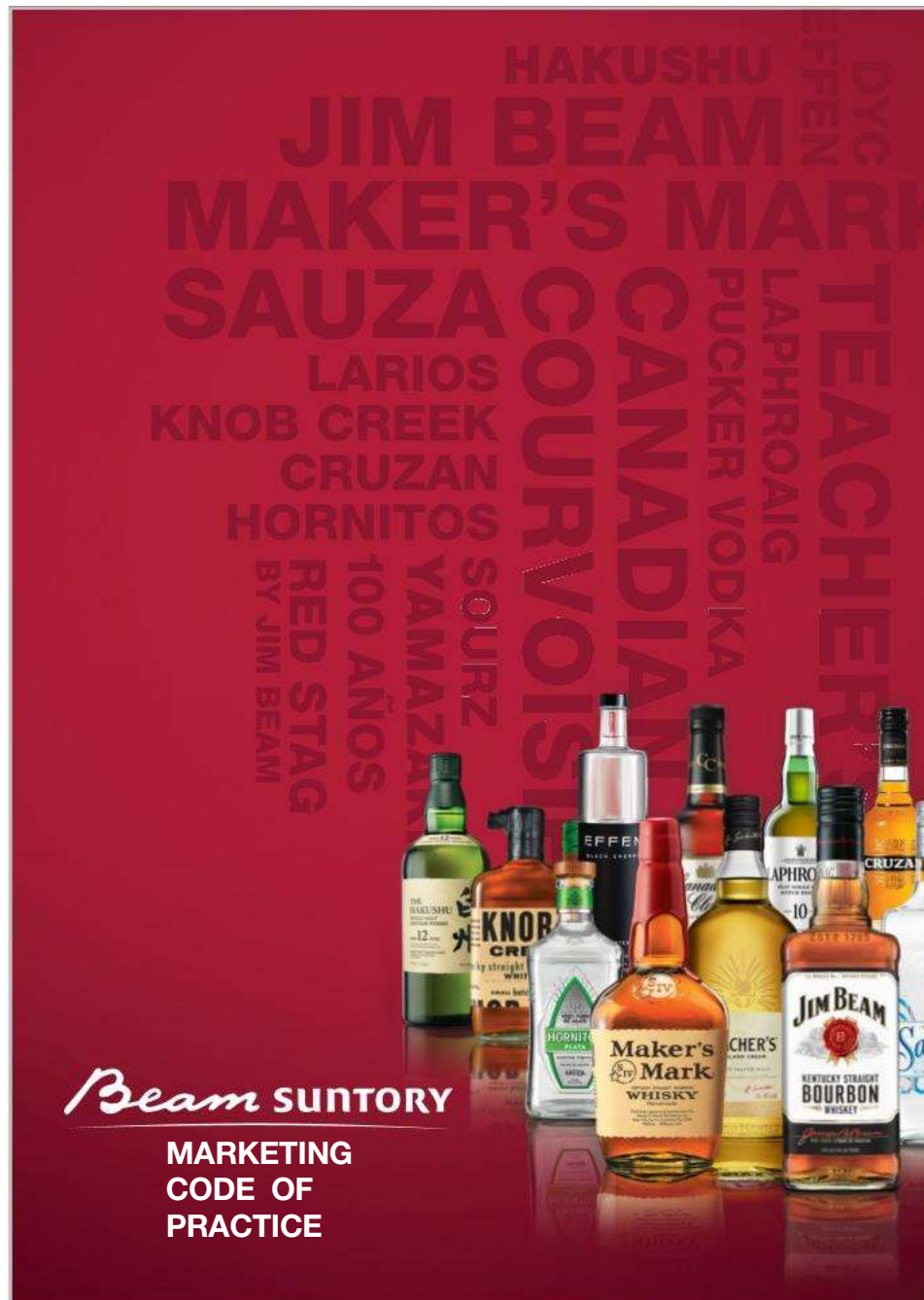
**From Other Locations: dial the number for the country where you are located**

Employees may also report online at <https://beamsuntory.ethicspoint.com> or contact Global Compliance at [global.compliance@beamsuntory.com](mailto:global.compliance@beamsuntory.com). If your country does not have a dedicated number, we recommend reporting through these channels.

The Company has a policy of preventing retaliation against any employee for making a report in good faith.

Australia	1-800-430952
Brazil	0800 721 8526
China	4001200373
France	0800 99 17 22
Germany	0-800-180-1766
India	000-800-919-0232
Ireland	1800 550 000 dial code: 800 374 6129
Japan	0120-147-710
Mexico	8006818033
New Zealand	0800 748 304
Russia	8-800-301-85-32
Singapore	8004922298
South Africa	080 099 6360
South Korea	080 880 2122
Spain	900-876376
Taiwan	00-801-49-1611
United Kingdom	0800-048 5849







The image features a collection of liquor bottles in the foreground, including Jim Beam Kentucky Straight Bourbon Whiskey, Maker's Mark Whisky, Knob Creek, and others. The background is a dark red color with a word cloud of various brand names in white and light red text, such as HAKUSHU, JIM BEAM, MAKER'S MARK, SAUZA, LARIOS, KNOB CREEK, CRUZAN, HORNITOS, RED STAG BY JIM BEAM, 100 AÑOS, YAMAZAKI, SOURZ, CANADIAN, PUCKER VODKA, LAPHROAIG, TEACHER, and EFFEN. The bottles are arranged on a reflective surface.

*Beam* **SUNTORY**  
MARKETING  
CODE OF  
PRACTICE

# Appendix C

TABLE OF CONTENTS	INTRODUCTION
<b>Introduction</b> .....3	Beam Suntory proudly produces and markets some of the world’s finest beverage alcohol products in many countries around the globe. Production and consumption patterns differ widely from one country or region to another and particularly with regard to different categories of beverages, all of which have their own individual characteristics and place within respective local cultures. With this in mind, the Beam Suntory Marketing Code of Practice (the “Code”) demonstrates our commitment to the responsible advertising and marketing of our brands.
<b>Purpose of Code</b> .....3	As a global leader in premium spirits, we offer our consumers the keys to responsibility through drink smart® (www.drinks mart.com). Likewise, all of our Beam Suntory personnel must familiarize themselves with this Code and the principles of drink smart® in order to convey a message of responsibility, both in consumption and in our marketing and advertising.
<b>Scope</b> .....4	Responsible marketing of our products is at the core of our commercial purpose. The Code is about conducting our business the right way, the Beam Suntory way. As we grow our business around the world, we will continue our leadership in responsible consumer communications through the highest standards of responsible marketing practices.
<b>Core Principles</b>	<b>PURPOSE OF CODE</b>
1. Responsible Consumption.....5	The purpose of this Code is to set the standard for responsible marketing and advertising directed to legal purchase age (LPA) adults who choose to drink. Our objectives for sales, marketing, promotion and advertising activities are to compete for brand choice among LPA consumers, and to deliver responsible communications that speak to those consumers.
2. Directing Marketing and Advertising to Legal Purchase Age Adults.....5	Our commitment to responsibility is demonstrated by upholding the highest standards in brand marketing and reminding LPA adults who choose to consume beverage alcohol to do so with respect and in moderation.
3. Responsibility Message.....6	In many countries, there are national or regional advertising and marketing codes, laws and regulations, both mandatory and self-regulatory. This Code is intended to complement these local codes and requirements while also providing responsible company standards in countries where marketing codes and local regulations are not yet in effect.
4. Hazardous and Dangerous Activities.....6	Our Code and the principles it contains also provide guidance to those with whom we do business, to help ensure our brands are marketed and promoted in a responsible manner to LPA adults. We also expect and require our partners to employ the high standards we have set for the promotion and sale of our brands.
5. Performance, Medical and Therapeutic Claims.....7	
6. Alcohol Content.....7	
7. Social Content.....7	
8. Sexual Content.....7	
9. Consumer Research Policy.....8	
10. Product Innovation and Presentation.....9	
11. Promotional Events, Sampling and Sponsorships.....9	
12. Electronic/Digital/Direct Marketing.....10	
13. Product Placement.....10	
14. Licensing and POS.....11	
15. Compliance Procedures.....11	
<b>Contact Information</b> .....13	
	
	<b>3</b>

# Appendix C

## SCOPE

Compliance with this Code is mandatory for all of the Beam Suntory family of companies.

This Code applies to all our beverage alcohol products, including those sold on behalf of third parties. This Code applies to all brand advertising, consumer communications, trade advertising, promotions (both on- and off-premise), sampling, merchandising, brand websites and direct marketing, point-of-sale materials, brand innovation, consumer planning and research, consumer public relations, events, sponsorship activities and product placement.



## CORE PRINCIPLES

### Advertising and marketing must:

- Be directed to LPA adults.
- Have content which is designed to appeal to LPA adults and is never intended to be directed towards or primarily appeal to those under LPA.
- Be placed in media outlets and locations where at least 70% of the audience is reasonably expected to be LPA adults. This percentage may be higher in some markets (e.g. United States where the Media Placement Standard is 75% of LPA, reaching an annual aggregate of 85% of LPA).
- Be legal, decent and truthful, conforming to the accepted principles of fair competition and good business practice.
- Maintain social and ethical standards with respect to gender and cultural differences.
- Reflect Beam Suntory's commitment to social responsibility.

### I. Responsible Consumption:

#### Advertising and marketing must:

- Present our brands to consumers in a responsible manner.
- Not encourage excessive or irresponsible consumption or present abstinence or moderation in a negative way. This applies to the amount of beverage alcohol being consumed as well as the manner in which it is portrayed.
- Never suggest any association of alcohol consumption with violent, daring, dangerous, unruly or anti-social activities.
- Never suggest any association with illegal drugs or drug culture.
- Not suggest, condone or promote intoxication or excessive drinking.
- Not be directed to pregnant women or women trying to become pregnant.

### 2. Directing Marketing and Advertising to LPA Adults:

#### Advertising and marketing must:

- Be directed and designed to appeal to a LPA adult audience.
- Not depict children or portray objects and images, such as Santa Claus or cartoon figures, or placed and/or constructed in a way that primarily appeals to persons below LPA.
- Not appear in sections of newspapers, magazines or other publications or programming that might specifically appeal to those under LPA (e.g. comic pages).
- Not employ or utilize religion or religious themes.
- Not associate our brands with the attainment of, or "rite of passage" to, adulthood.

## Appendix C

- Employ actors and models in advertisements, promotional materials or point-of-sale, proven to be at least 25 years of age (and reasonably appear to be LPA or older), substantiated by proper identification.
- Not use the term “Spring Break” in promotional related activities or materials. This is a term synonymous with spring recess/vacation from school for those under LPA in North America.

### 3. Responsibility Message:

#### Advertising and marketing must:

- Include a responsible drinking message. This message must be placed horizontally and be clearly legible and noticeable to consumer
- Placement and message may vary across marketing materials and will be determined by the size and material of the communication element.
- Further guidance is provided in the Social Responsibility Statement Execution Guidelines document on the Beam Suntory Stir Portal.
- The only exception is when the item is so small that the message would be illegible and no other creative alternatives exist for inclusion.

### 4. Hazardous and Dangerous Activities:

#### Advertising and marketing may:

- Suggest or depict consumption of beverage alcohol as part of relaxing or celebration after active recreation or work, as long as the setting and depiction make it reasonably clear that the activity requiring alertness or coordination has ended. One example would be an “après-ski” celebration in a ski lodge.

#### Advertising and marketing must:

- Not encourage or condone driving mechanically propelled vehicles or operation of potentially dangerous machinery while under the influence of alcohol.
- Not depict actual consumption of our products.
- Not depict alcohol beverage consumption with participation in activities that could be particularly dangerous while consuming alcohol, such as swimming, sailing, bicycle riding, skiing, horseback riding; or the performance of potentially hazardous activities of any kind which require a high degree of alertness or physical coordination.



### 5. Performance, Medical and Therapeutic Claims:

#### Advertising and marketing must:

- Not create the impression that consumption of alcohol enhances mental ability or physical performance.
- Not suggest alcohol has medicinal and therapeutic qualities.
- Not attribute the ability to prevent, treat or cure a human disease to alcohol or refer to such properties.

### 6. Alcohol Content:

#### Advertising and marketing must:

- Only display truthful information on alcohol strength and not emphasize alcohol strength as a positive attribute of the brand.
- Not misrepresent the alcohol strength of the brand or its alcohol content.
- Not imply that consuming brands of low alcohol strength will avoid abuse or intoxication.

### 7. Social Content:

#### Advertising and marketing may:

- Portray alcohol consumption as part of responsible personal and social experiences.

#### Advertising and marketing must:

- Not suggest the success of an occasion depends on the presence or consumption of alcohol.
- Not contain claims that individuals can attain social, professional, educational or athletic success or status as a result of beverage alcohol consumption.
- Not create the impression that consumption of alcohol will increase confidence, popularity or social success.

### 8. Sexual Content:

#### Advertising or marketing may:

- Portray people in a social or romantic setting showing affection, or who appear to be affluent or attractive.

#### Advertising and marketing must not contain or depict:

- Alcohol consumption as enhancing sexual attractiveness or as a requirement or enhancement for sexual success.
- Graphic or gratuitous nudity, overt sexual activity, promiscuity or sexually lewd or indecent images or language.
- Words or imagery that may offend local and generally prevailing standards of taste and decency.



## Appendix C

### 9. Consumer Research Policy:

- All consumer research will be conducted only with consumers of LPA. No effort will be made to learn about consumers' habits, practices, beliefs or any other points of view about alcohol brands as they held them prior to reaching LPA.
- Consumer research from a specific market cannot be utilized in brand planning for markets where the LPA is higher than the LPA in the market where the research was conducted, unless all research participants are over the LPA in both markets.



### 10. Product Innovation and Presentation:

- Beam Suntory will not develop or promote its brands as "energy drinks."<sup>11</sup>
- Beam Suntory will not promote its brands with any products marketed as energy drinks.

### 11. Promotional Events, Sampling and Sponsorships:

Promotional and sponsorship activities must not encourage irresponsible, excessive or illegal consumption.

- In line with other elements of this Code, Beam Suntory will promotional and sponsorship activity:
  - Is directed to LPA adults.
  - Any staff, models or volunteers must be at least LPA.
  - Maintains social and ethical standards with respect to gender and cultural differences.
  - Meets all national (and local) legal and regulatory requirements, including charitable fundraising laws.
- Specifically, promotions cannot encourage:
  - Rapid drinking
  - Drinking and driving
  - Binge drinking
  - Exceeding any recognized government consumption guidelines
  - Intoxication
- Branded merchandise will not be offered and must not have a primary appeal to those under LPA.
- Beam Suntory will only engage in promotions, samplings or sponsorship when at least 70% of the audience in the setting can be expected to be of LPA. This percentage may be higher in some markets (e.g. United States where the standard is 75% of LPA, reaching an annual aggregate of 85% of LPA)
- When organizing sampling or promotional events, follow these guidelines:
  - Sampling of beverage alcohol must not be offered to those under LPA.
  - Prior to undertaking any sampling activity, all necessary approvals must be obtained (including any necessary permits, license and/or regulatory approvals).



# Appendix C

- Sampling and promotional events must encourage responsible consumption and behavior, they should discourage any activity that would encourage excessive/abusive consumption.
- All sampling personnel must be LPA or older, briefed on the Code, and understand local/regional laws and regulations.
- Consideration should be given to providing water, or non-alcoholic drinks and light snacks, where allowed.
- Any sponsorship involvement with activities that might be hazardous after alcohol consumption (e.g. motorsports) must ensure that no link is made suggesting that alcohol consumption is appropriate while undertaking such activities; nor that success in these pursuits is enhanced by alcohol consumption.

## 12. Electronic/Digital/Direct Marketing:

- The standards of the Code apply to all media platforms, including digital media, which is used to transmit commercial communications made or generated by Beam Suntory. Guidelines for digital marketing can be found on the Beam Suntory Stir Portal/Digital Marketing Guidelines. The Digital Marketing Guidelines apply to branded digital marketing properties, including but not limited to brand websites and brand pages, social network sites and blogs, as well as mobile communications and applications.
- Given the rapidly changing pace of digital media, the policies outlined may not always address a specific situation. Where our policies do not cover a specific circumstance, clearance process must be followed through Marketing, Legal and/or Industry Affairs.

## 13. Product Placement:

### Product placement in movies, television or music video productions will be considered if:

- The production is directed and primarily appeals to an adult audience.
- Content does not feature underage drinking, excessive drinking or other irresponsible consumption such as driving while intoxicated.
- Content does not feature violence or aggression linked to alcohol consumption.
- Primary characters are of LPA.
- Exceptions may be made on a case-by-case review and assessment of overall thematic content.

### Product placement will only be approved if:

- Sufficient information is provided to prove the specific scene and setting in which the brand(s) will be featured and the overall context in which the brand and the character(s) consuming beverage alcohol in the production are compliant with the social responsibility guidelines outlined in this Code.
- Written consent is provided to producers and film companies to use our brands. If a script is deemed inappropriate, written communication must be sent to the relevant party denying permission to use the brands.

## 14. Licensing and POS:

### The following are examples of items which are inappropriate for point-of-sale, merchandising or licensing:

- Materials primarily appeal to persons under LPA.
- Candy, except for gourmet chocolates or other high-end confectionery items which are clearly intended for adults.
- Sexual paraphernalia, e.g., condoms.
- Drug-related paraphernalia.
- Guns, knives or items generally referred to as weapons, except tools or cutlery items for culinary purposes and adult sporting activities.

## 15. Compliance Procedures:

- All Beam Suntory personnel must be familiar with this Code and comply with all its provisions.
- Advertising agencies, market research companies, media buyers and other third parties involved with the marketing and advertising of our brands must receive a copy of this Code and must abide by its provisions in any work they do on behalf of Beam and its brands.
- All Beam Suntory personnel responsible for marketing and promotional materials and activities must complete compliance training and are required to adhere to this Code and take part in periodic training.
- All regional businesses must establish and adhere to processes to ensure compliance to the letter and the spirit of this Code, local laws and regulations, consumer promotions and privacy laws, intellectual property laws and best practices, and applicable national and regional advertising marketing codes.
- Code compliance is the fundamental responsibility of our in-market business general managers, and covers all marketing, advertising and promotional materials and activities in the on- and off-trade and is required for brand innovation activities, brand launch campaigns, consumer public relations and all other brand communication activities.

## Appendix C

- Complaint procedures for alleged non-compliance with the Code are included on the corporate website ([www.beamglobal.com](http://www.beamglobal.com)) to allow interested parties to register potential grievances confidentially.
- Beam Suntory will evaluate alleged grievances regarding Code compliance registered with the company and record and respond to the parties registering such grievances, as deemed appropriate.



### CONTACT INFORMATION

For further information on the Beam Suntory Marketing Code of Practice, or other compliance issues, please contact the local in-market general manager

Associate General Counsel  
for the Americas  
Beam Suntory  
Merchandise Mart  
222 W. Merchandise Mart Plaza  
Chicago, IL 60654  
(312) 964-6999

Associate General Counsel  
for International  
Beam Suntory Spain, S.L.  
c/Mahonia 2-Edificio "Portico"  
(Campo de las Naciones)  
28043-Madrid, Spain  
011 34 91 353 46 31 (phone)

For general marketing inquiries, please contact the Marketing Department.

