

GLOBAL CODE OF

responsible practices

FOR BEVERAGE ALCOHOL
ADVERTISING AND MARKETING



Constellation Brands

PREAMBLE

Constellation Brands, Inc. (“CBI”) is the world’s leading premium wine company with a broad portfolio of widely admired premium products across the wine, beer and spirits categories. These products are sold by CBI and its affiliates around the world. Whether it is celebrating special occasions, enjoying a family meal or spending time with friends, millions of people enjoy CBI products worldwide as CBI realizes its vision: “To elevate life with every glass raised.”

Because CBI takes social responsibility very seriously, CBI has developed this Global Code of Responsible Practices for Beverage Alcohol Advertising and Marketing (“Code”) to provide guidance to its employees, agencies, and affiliated companies involved in the promotion of CBI brands, wherever those brands are sold.

While a single global code cannot cover all specific regulations, policies and social norms in every country’s markets, this Code is meant to provide the fundamental framework for responsible brand promotion including marketing and advertising by CBI and its affiliated companies, importers, agents, distributors and representatives. Additions may be made to this Code to ensure compliance with a specific country’s laws and customs. However, such changes will be in addition to — and not in substitution for — the standards in this Code.

CBI companies are committed to responsible placement for, and content of, brand communications. The overriding principle of this Code is to ensure CBI products are marketed to legal purchase age adults in a responsible and appropriate manner. To this end, all CBI companies will conduct their advertising and marketing practices in accordance with both the express provisions and the spirit and intent of this Code.

The consumption of beverage alcohol products has played an accepted and important role in the cultural, religious, and social traditions of both ancient and modern society. CBI takes special pride in its products and its commitment to promoting responsible drinking by those adults who choose to drink. CBI companies encourage responsible decision making regarding drinking, or not drinking, by adults, and discourage abusive or illegal consumption of their products. CBI urges adults who choose to consume to do so in moderation. Nevertheless, it is the obligation of each consumer who chooses to drink to enjoy beverage alcohol products in a responsible manner.

As a global beverage alcohol enterprise, CBI and its affiliated companies play an active role in numerous trade and industry organizations. CBI is committed to working with its industry partners and customers to ensure that social responsibility activities including industry codes remain a priority and help address misuse and illegal consumption of beverage alcohol. CBI also engages with its regulators to share best practices for social responsibility activities and to comply with applicable laws and regulations.

Compliance with this Code is mandatory for all CBI companies in all countries, and its provisions must be considered and adhered to as part of the approval process for all promotion, advertising and marketing materials. For any BI-affiliated entity in which CBI maintains less than a controlling interest (i.e., 50% or less ownership or voting share), it is not possible for CBI to compel such entity to abide by the provisions of this Code. In such circumstances, CBI recommends that such entity adopt (i) this Code, (ii) a substantially similar code of responsible marketing practices, or (iii) the best practices in responsible marketing for the beverage alcohol segment in the country in which such entity does business.

This Code supersedes all previous editions of any CBI code of responsible practices for advertising and marketing, and is anticipated to be further updated from time to time to reflect continuous improvement in social responsibility practices and code compliance.

SCOPE

This Code applies to all activities undertaken to advertise and promote CBI's products around the world. "Advertising and promotion" includes all brand advertising, consumer communications, trade advertising, promotional events, packaging, labels, distribution and sales materials, and product placements.

The provisions of this Code apply to every type of print and electronic media, including the internet and any other on-line, web-based or digital communications used to advertise or market CBI's beverage alcohol products. These provisions also apply to every type of promotional or marketing activity or event, including all product placements (e.g., movies, television programs, music videos, video or on-line games) and sponsorships. Sponsorships are commercial, contractual agreements between a CBI company (the sponsor) and a sponsored party or sponsorship property establishing an association between the sponsor's brands or products and the sponsored party or sponsorship property in return for rights to promote this association.

CBI companies recognize that it is not possible to cover every eventuality, and therefore agree to observe the spirit, as well as the letter, of this Code. Questions about the interpretation of this Code, CBI companies' compliance with this Code, or the application of this Code's provisions should be directed to the General Counsel of the relevant CBI company.

RESPONSIBLE PLACEMENT

ADULT AUDIENCES/UNDERAGE PERSONS

1. Beverage alcohol advertising and marketing materials are intended for adults of legal purchase age who choose to drink.
2. Beverage alcohol products should not be advertised or marketed in any manner directed, or primarily appealing, to persons below the legal purchase age. (The definition of “primarily appeal” is set forth in paragraph 3 of the “Responsible Content” section below).
3. Beverage alcohol advertising and marketing should be placed in broadcast, cable, radio, print and internet/digital communications only where at least 71.6 percent (or greater, as called for by standards in that country) of the audience is reasonably expected to be above the legal purchase age as determined by using reliable, up-to-date audience composition data.
 - To facilitate these placement commitments, recognized media composition data should be reviewed on a regular basis (at least annually) in order to ensure that the audience composition data are current and appropriate.
 - Internal, periodic after-the-fact audits of a random portion of past placements should be undertaken to verify that such past placements were in compliance with this Code and to take appropriate, corrective action for future placements.
 - Detailed demographic data/advertising placement guidelines have been developed to implement various responsible placement provisions of this Code and are updated periodically to reflect the most current and appropriate placement procedures.
4. Appropriate measures and best efforts should be taken so that beverage alcohol advertising and marketing does not appear at events unless at least 71.6 percent (or greater, as called for by standards in that country) of the audience is reasonably expected to be above the legal purchase age.
5. Fixed beverage alcohol advertising and marketing materials may be placed at venues that are used primarily for adult-oriented events defined as where at least 71.6 percent (or greater, as called for by standards in that country) of the audience attending those venue events is reasonably expected to be above the legal purchase age.
6. Beverage alcohol products should not be advertised or marketed in college or university newspapers, or on college and university campuses except for inside licensed retail establishments located on such campuses.
7. CBI company sponsored beverage alcohol promotions should not be conducted in an on-campus licensed retail establishment owned or operated by a college or university, unless for educational purposes at the request or with the approval of such college or university.
8. Beverage alcohol advertising should not be placed on any outdoor stationary location within five hundred (500) linear feet (or the metric equivalent, as appropriate in that country) of an established place of worship or an elementary school or secondary school except on a licensed premise.

RESPONSIBLE CONTENT

ADULT AUDIENCES/UNDERAGE PERSONS

1. Beverage alcohol advertising and marketing materials are intended for adults of legal purchase age who choose to drink. Beverage alcohol advertising and marketing materials must comply with all aspects of this Code regardless of where these materials are placed; for example, the nature or subject matter of a particular publication is not relevant.
2. The content of beverage alcohol advertising and marketing materials should not primarily appeal to individuals below the local legal purchase age.
3. Beverage alcohol advertising and marketing materials should not depict a child (except if the depiction is merely incidental to the focus of such materials with no implication that the child is a consumer) or portray objects, images or cartoon figures that primarily appeal to persons below the legal purchase age. Advertising or marketing material is considered to “primarily appeal” to persons below the legal purchase age if it has special attractiveness to such persons beyond the general attractiveness it has for persons above the legal purchase age.
4. Beverage alcohol advertising and marketing materials should not contain the name of or depict Santa Claus.
5. Beverage alcohol products should not be advertised or marketed on the comic pages of newspapers, magazines or other publications.
6. Beverage alcohol products should not be advertised or marketed in a manner associated with the attainment of adulthood or the “rite of passage” to adulthood.
7. Beverage alcohol products should not be advertised or promoted by any person who is below the legal purchase age or who is made to appear to be below the legal purchase age. To help ensure that individuals in beverage alcohol advertising are, and appear to be, above the legal purchase age, models and actors employed should be a minimum of the applicable legal purchase age in that country plus four years (e.g., in the U.S., LPA is 21, so models and actors must be at least 25 years old) as substantiated by proper identification, and should reasonably appear to be at least as old as the applicable legal purchase age in that country.
8. No brand identification, including logos, trademarks or names, should be used or licensed for use on clothing, toys, games or game equipment, or other items intended for use primarily by persons below the legal purchase age.
9. The manufacture of brand logoed apparel, and the licensing of company trademarks used in connection with the sale of brand logoed apparel, should be limited to only adult sizes.

WEBSITES

10. Age affirmation mechanisms should be employed for CBI company-controlled beverage alcohol advertising and marketing websites. They also should contain a reminder of the pertinent legal

purchase age, or a reference to a website to confirm the applicable legal purchase age in the website visitor's country.

11. CBI companies recognize the crucial role parents play in educating their children about the legal and responsible consumption of beverage alcohol. To enable parents who choose to prevent their children from accessing internet websites without their supervision, CBI will provide those parents and the manufacturers of parental control software, upon request, the website address of each CBI company so that the parent or manufacturer can use this information.
12. Each CBI controlled website with advertising or marketing materials should provide, where available, a link to a site that promotes responsible decision making in the consumption of beverage alcohol.
13. CBI controlled websites that contain downloadable advertising or marketing content should include instructions to individuals downloading the content that they should not forward these materials to individuals below the legal purchase age and the downloadable content itself should include a responsible drinking statement where practicable.

SOCIAL RESPONSIBILITY

14. Beverage alcohol advertising and marketing materials should portray beverage alcohol products and drinkers in a responsible manner. Beverage alcohol products and drinkers may be portrayed as part of responsible personal and social experiences and activities, such as the depiction of persons in a social or romantic setting, persons who appear to be attractive or affluent, and persons who appear to be relaxing or in an enjoyable setting.
15. Beverage alcohol advertising and marketing materials should not depict situations where beverage alcohol is being consumed excessively or in an irresponsible manner. These materials should not portray persons in a state of intoxication or in any way suggest that intoxication is socially acceptable conduct, and they should not promote the intoxicating effects of beverage alcohol consumption.
16. Beverage alcohol advertising and marketing materials should not depict those people who choose not to drink in a negative light or imply that they enjoy life less than those who do drink.
17. Beverage alcohol advertising and marketing materials should not contain any curative, therapeutic, nutritional or health claim except as permitted by law.
18. Beverage alcohol advertising and marketing materials should contain no claims or representations that individuals can attain social, professional, educational, or athletic success or status as a result of beverage alcohol consumption.
19. Beverage alcohol products should not be advertised or marketed in any manner associated with abusive or violent relationships or situations.
20. Beverage alcohol advertising and marketing materials should not imply illegal activity of any kind.
21. Beverage alcohol advertising and marketing materials should not portray beverage alcohol being consumed by a person who is engaged in, or is immediately about to engage in, any activity that requires a high degree of alertness or physical coordination.

22. Beverage alcohol advertising and marketing materials should not be associated with antisocial or dangerous behavior.
23. Driving while intoxicated is against the law in many places. Beverage alcohol advertising and marketing materials should not portray, encourage or condone driving any motor vehicle while intoxicated.

GOOD TASTE

24. CBI brands are sold in many countries around the world. Given cultural sensitivities among those different locations, it is difficult to develop a global definition for beverage alcohol advertising and marketing. Accordingly, CBI expects CBI company marketing teams and agencies to be aware of these circumstances and to ensure that global and local brand communications for CBI company products do not contain any images, symbols or figures which are likely to be considered offensive or demeaning to gender, racial, religious, cultural or minority groups.
25. Beverage alcohol advertising and marketing materials should reflect generally accepted, contemporary standards of good taste.
26. Beverage alcohol advertising and marketing materials should not degrade the image, form, or status of women, men, or any ethnic, minority, sexual-orientation, religious, or other group.
27. Beverage alcohol advertising and marketing materials should not contain any lewd or indecent images or language.
28. Beverage alcohol advertising and marketing materials should not employ religion or religious themes, except where relevant to the heritage of a particular product.

SEXUAL PROWESS AND SEXUAL SUCCESS

29. Beverage alcohol advertising and marketing materials may depict affection or other amorous gestures or other attributes associated with sociability and friendship. While a brand preference may be portrayed as a mark of good taste and discernment, beverage alcohol advertising and marketing materials should not rely upon sexual prowess or sexual success as a selling point for the brand. Accordingly, advertising and marketing materials should not contain or depict graphic or gratuitous nudity, overt sexual activity, promiscuity or sexually lewd or indecent images or language.

PROMOTIONAL EVENTS

30. On-premise promotions sponsored by CBI companies should encourage responsible consumption by those adults who choose to drink and discourage activities, including drinking games that reward or encourage excessive / abusive consumption.
31. Where supplier sampling is permitted, CBI companies should ensure that appropriate measures are employed to safeguard against underage drinking, including ensuring that individuals conducting the sampling on behalf of the CBI company are of legal purchase age.
32. CBI companies should not promote or encourage any drinking in conjunction with reckless and/or irresponsible behavior at any promotion sponsored, or participated in, by a CBI company.

33. Beverage alcohol advertising and marketing materials should not use the term, or sponsor events or activities that use the term, “spring break” or similar regional expressions synonymous with school holiday recess/vacation for persons below the legal purchase age, except if those events or activities are located at a licensed retail establishment.

PRODUCT PLACEMENTS

34. Movies, television programs, music videos, and video games often may portray the consumption of beverage alcohol products and related signage in their productions. For those CBI companies which seek placement opportunities, product placements will be guided by the following principles:
- Case-by-case assessment: CBI companies should approve or reject a product placement on a case-by-case basis based upon the information about the movie, television program, music video, or video game available at the time provided by the project’s producers.
 - Portrayal of drinking and driving: Driving while intoxicated is dangerous and against the law in many places so beverage alcohol advertising and marketing materials should not portray, encourage or condone driving any motor vehicle while intoxicated. CBI companies should not approve a product placement where a character engages in illegal or irresponsible consumption of a CBI company product in connection with driving.
 - Underage drinking: CBI strongly opposes underage drinking. CBI companies should not approve a product placement which portrays the purchase or consumption of a CBI company product by a person who is below the legal purchase age.
 - Primary appeal to persons below the legal purchase age: CBI companies should not approve a product placement where the primary theme(s), because of its content or presentation, is especially attractive to persons below the legal purchase age beyond the general attractiveness of such theme(s) to persons of legal purchase age.
 - Portraying alcoholism/alcohol abuse: CBI companies should not approve a product placement where a character uses a CBI company product irresponsibly or abusively or where alcoholism is portrayed, unless the depiction supports a responsible consumption message.
 - Measured media: CBI companies should not request or approve a product placement in any measured media unless the placement is consistent with the responsible placement provisions of this Code.

ALCOHOL CONTENT

35. Beverage alcohol advertising and marketing materials should not refer to the alcohol content of a beverage alcohol product, except in a straightforward and factual manner or as may be required by law, or promote the potency of a beverage alcohol product.

SOCIAL RESPONSIBILITY STATEMENTS

36. Responsible drinking statements should be included in beverage alcohol advertising and marketing materials, on websites, and at promotional events where practicable.

MANDATORY INTERNAL COMPLIANCE PROCESS

1. CBI companies have established an internal process to ensure compliance with this Code.
 - If there are any questions regarding a particular campaign or marketing material, the External Affairs and Legal Departments should be consulted. The Legal Department must always be consulted, not just when there is a question as to compliance with this Code.
2. All CBI companies must enforce Code compliance. If there is no local CBI Legal Department, the General Counsel responsible for the legal affairs of such CBI company is the appropriate resource.
3. CBI companies must provide a copy of this Code to all advertising agencies, media buyers, and other external service providers or consultants involved in each CBI company's advertising, marketing, or promotional activities.
4. Any criticism or controversy regarding a CBI company's marketing or advertising initiatives must be reported immediately to CBI's External Affairs and Legal Departments in Victor, NY. Local managers and the External Affairs and Legal Departments will determine if any steps should be taken to avert a violation of law or of this Code, or a risk to CBI's reputation.

Updated: June 2011

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Please enjoy our products responsibly.