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## External Communications Policy

**Date: August 10, 2021**

**From: Board of Directors of DO & CO AG**

**To: Management**

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DO & CO values public perception, enjoyment and trust in its brands. We are aware that reputation is one of our most precious assets, and above all else, we value the experience our customers have with our company. It is therefore particularly important to DO & CO that our brands are enjoyed in the intended way.

DO & CO supports the notion that responsible external communications can assist consumers in making appropriate choices about food and beverage products, as well as in understanding the role of nutrition, diet and physical activity in order to achieve a healthy and active lifestyle. By conveying external communications consistent with the principles of good nutrition, balanced diet and personal choice, the industry can play an important role.

In alignment with our sustainability and business goals, DO & CO has composed this External Communications Policy. Whilst it aims to protect our operations and our brands, it most importantly intends to respect the society in which we operate. It's about being decent, honest and truthful in the way we market our brands so that both as a company and as an industry, we can help address social issues such as obesity or malnutrition.

It shall be used as reference for all our marketing and commercial communications, regardless of media and covers all external communications. This addresses, but is not limited to the areas of:

- Traditional advertising and public relations
- Packaging and labelling
- Point of sale (materials, merchandising, sampling, displays)
- Signage
- Branding
- Trade promotions
- Sponsorships (events, product placements, celebrities, influencers)
- Digital advertising, mobile advertising and social media
- e-Commerce

As a global service provider, DO & CO applies the **“Framework for responsible food and beverage communication”** adopted by the **ICC - International Chamber of Commerce to form the foundation of our Policy**. The Policy shall be regarded as our minimum standard and doesn't serve to substitute EU, national, regional or international laws, policies or codes, which must always be upheld. As such, the policy embodies our approach to “self-regulation”. Compliance with the policy is mandatory and further extends to any other 3<sup>rd</sup> party involved in the marketing and sales of our brands.



## Definitions:

**Audience Verification:** Determining if 70% of a channel's audience is over 12 years of age.

**Brands:** All company owned or controlled brands.

**Brand Promoters:** Brand Promoters play an important role in our society with regards to promoting brand portfolios to consumers at point of sale and at events. Their role is to promote our brands, provide samples, and engage with our end-consumer at restaurants, shops or at events. Brand Promoters can be employed directly by DO & CO or through a distributor on our behalf.

**Company Owned or Controlled:** All of the brands in our DO & CO portfolio as well as any brands we own but license to others (or manage through a joint venture).

**Digital Media:** All marketing and commercial communication by means of digital technology which includes social media and e-Commerce that we have under our control. It includes but is not limited to:

- Brand websites
- e-Commerce websites
- Social media platforms such as Facebook, Twitter, Instagram, YouTube etc.
- Digital ads
- Banners, pop-ups, takeovers, etc.
- Downloadable applications (apps)
- User Generated Content (UGC), if under our control
- email

**Children:** refers to individuals aged 12 years and under

**Primarily Appeal to Minors:** When something has a greater appeal or is more attractive to Children.

**70/30 Rule:** Only when 70% of the audience is reasonably expected to be persons above 12 years of age the platform is considered not to Primarily Appeal to Minors. Marketing or commercial communications shouldn't appear on the chosen media channels if more than 30% of the audience is known or reasonably expected to be Children.

**User Generated Content (UGC):** content that is created by users themselves. It may include emails, text, audio, video, photo or any other type of media that is submitted by users to blogs, social networks, message boards or other interactive websites under the control of DO & CO



## Principles:

**1. It is imperative to direct our marketing and external communications towards adult**

Avoid “Primarily Appeal to Minors”. This means we will not produce licensed merchandise which primary appeal is Children.

**2. Create external communications in an age appropriate manner which ensures appeal solely to adults.**

Refrain from the use of objects, imagery, styles, symbols, music, characters (real or fictitious), games, gaming equipment or other items with Primary Appeal to Minors.

**3. All sponsorships of any kind should be targeted at adult consumers.**

No advertisement in media directly targeted at Children, including shows, print, websites, movies and email marketing. We will not use celebrities, characters or other influential figures who Primarily Appeal to Minors.

**4. The company ensures that all those involved in a company’s marketing activities such as market influencers, bloggers, vloggers and affiliate networks communications should be familiar with this policy on social responsible marketing.**

Include reference to the policy in all of the partnership contracts, if applicable, and provide hard copies upon request, alternatively communicate content and periodically assess compliance therewith

**5. All user generated content submitted to DO & CO’s social media team will be moderated on a regular basis and removed within a short timeframe should it be deemed inappropriate or not in line with our marketing policy.**

Ensure that pictures do not display any dangerous situations or practices that might potentially result harmful lifestyle choices.

**6. We will always require consumer consent prior to sending any direct marketing or communication and arrange for easy way for consumers to stop our marketing and communications (opt-out).**

Point out to consumers where they can find the applicable data privacy policy and encourage them to read it. Besides the consumer consent, there should be a separate privacy notice (and cookie notice if required) on all DO & CO’s external communications websites. When we use or collect personal consumer data for marketing and commercial communication via Digital Media, we will comply with all EU and local privacy laws, including all required technical and operational measures to safeguard the collected personal consumer data.

**7. We commit to presenting products in a context of a balanced diet and therefore avoid any type of message that could encourage overconsumption of any of our products or the pursuit of unhealthy lifestyles.**

Ensure that portion sizes are appropriate to the setting portrayed and that no excess waste material is displayed. Furthermore, ensure that visuals respect the strict DO & CO hygiene standards such as the use of gloves or hair protection during food preparation

**8. All communication accurately represents the material characteristics of the featured product, such as taste, size, content nutrition and health benefits.**

Nutritional information and claims about nutrition and health benefits should have a sound scientific basis and come either directly from hygiene or production. All claims should also be judged by the likely perception of the reasonable consumer in order to prevent any deception.



## Responsibilities to ensure compliance with this policy

**Green Team:** the Green Team ensures that the policy is always up to date and reflects fully on all stakeholder inquiries regarding external communications. The policy is therefore reviewed on an annual basis and cross-checked with the other responsibility holders to inform them of any changes that might have occurred in the

**External communications team:** the team ensures that any commercial communications, as well as communications directed at our investors or any other stakeholders are compliant with the policy.

**Legal department:** the legal department is responsible for compliance with national and international legislative frameworks. It will therefore inform the external communications team of any contractual conditions regarding the topic of external communications with partners. Furthermore it will provide the Green Team with information regarding the changes of legislations such as the EU Privacy law, which might result in the adaptation of the external communications policy.

