

BRITVIC SOFT DRINKS POLICY STATEMENTS

THE MARKETING OF SOFT DRINKS TO CHILDREN

Introduction

We believe that a responsible approach to marketing to children is a central component in the creation and building of trusted, accessible brands, and a powerful force in driving positive choice

Philosophy

We understand that advertising and marketing messages are powerful tools in influencing preference and behaviour. We therefore take a responsible approach when marketing our products and brands to children.

We do not engage in any marketing activity to children aged under 5, and operate only according to a clear set of responsible guidelines for children under 16. We aim where possible to promote positive behaviour change to children, which for us is about making healthy lifestyle choices, including the consumption of a healthy, varied and balanced diet and a more active lifestyle. We will not engage in any activity that encourages children to 'pester' their parents or create an undue sense of urgency to purchase products.

Scope

This policy covers brand websites and all paid-for-media including broadcast and print output. It does not cover in-store materials, product labels or sampling activity, although all such activities must adhere to our overall philosophy. 'Children' are those under the age of 16 unless otherwise specified.

Policy

We will abide by relevant legislation and Codes of Practice (Annex A). All marketing activity must be in keeping with both the letter and the spirit of the codes.

In doing so we will abide by the following supplementary principles. For the purposes of this policy full sugar products are defined by the Food Standards Agency's nutrient profiling model as 'HFSS'¹:

- We will not aim advertising of any full sugar product to children under the age of 12 (under 16 on television).
- Brand advertising and sponsorship to children over five years is acceptable where the brand is not predominantly classed as full sugar².

¹ High in Fat, Salt, and Sugar. Refers to FSA's 2005 edition of the model

Logos should be accompanied by a 'non-HFSS' pack shot wherever possible.

- We will not use celebrities, licensed characters, promotions or nutrition/health claims in advertising aimed at the under 12s. However:
 - Promotions may feature in television advertising aimed at children for non-HFSS products or brands as a secondary message.
 - Celebrities, licensed characters and nutrition/health claims may feature in television advertising aimed at children for non-HFSS products or brands.
- Single pack formats aimed at children will only feature instant win promotions and not prize-driven collector schemes so as not to encourage over consumption.
- Marketing activity of any products that are of particular appeal to under 12s should, wherever possible, promote a healthy lifestyle.
- For marketing activity, we will distinguish between purchase occasions where an adult is present and able to influence the purchase and those where children are able to self purchase. In environments where both adults and children self purchase, we will apply the children self-purchase principles.
- Where children self purchase for immediate consumption, we will endeavour to ensure that serving volumes are 'right sized' for the occasion and appropriately described.
- Advertising/promotions in schools must be designed to support the curriculum or have an appropriate educational theme. Such communications should be carried out in partnership with an appropriate third-party wherever possible³.
- Marketing activity to children involving promotions and/or data collection should also have regard to separate Britvic policies on these matters.

This policy will be reviewed annually or in line with any change to legislation and Codes of Practice.

For and on behalf of Britvic Soft Drinks

Simon Stewart
Marketing Director
Britvic plc

² A full sugar brand is one where >50% of the volume sold is classed as 'High in fat, saturates, salt or sugar' by the FSA's Nutrient Profiling Model

³ i.e. Educational specialists

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Annex A

- OFCOM's Television Advertising of Food and Drink Products to Children (22 February 2007);
- BCAP Radio Advertising Standards Code;
- BCAP Television Advertising Standards Code ;
- The British Advertising, Sales Promotion and Direct Marketing Code (CAP Code 11th edition) for all non-broadcast marketing communication;
- Data Protection Act 1998;
- The Privacy and Electronic Communications (EC Directive) Regulations ;
- ASA Rules on the Particular Separation of Advertisements and Programmes;
- EC Directive 1997/36/EC;
- EC Directive 2005/29/EC;
- Department of Health Food and Drink Advertising and Promotions Forum;
- The Commercial Activities in Schools Best Practice Principles, jointly prepared by the Incorporated Society of British Advertisers, The Consumers Association and the Department for Education and Skills;
- The Automated Vending Association's Code of Practice, where our drinks are supplied through vending machines
- In addition, we are cognisant of:
 - the International Chamber of Commerce Code for Advertising and Marketing Communication Practice.;
 - International Chamber of Commerce framework for responsible food and beverage communications;
 - Education (Nutritional Standards for School Lunches) (England) Regulations 2000 and the Education Act 2006 and all associated legislation in Scotland and Wales;