

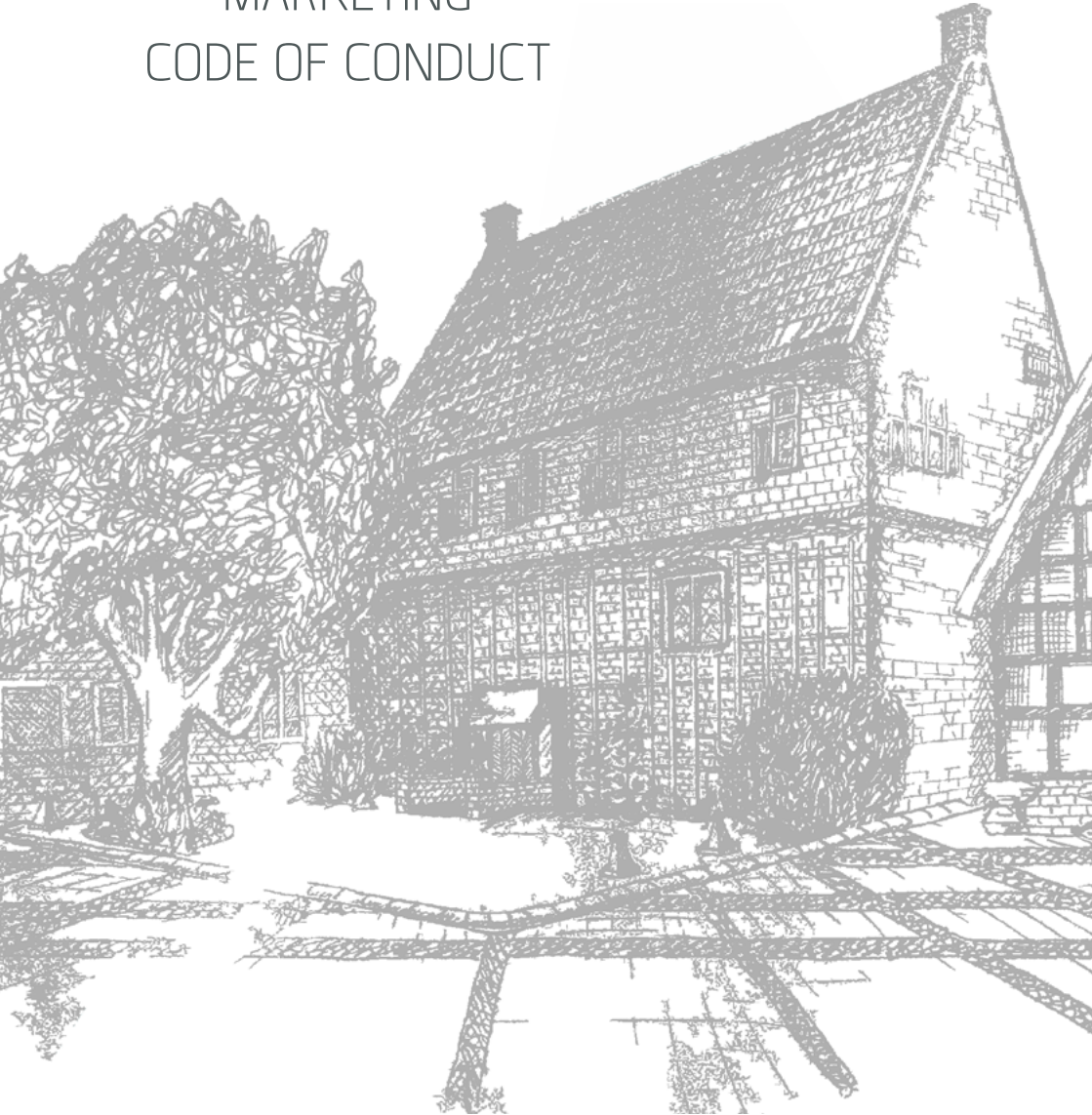
Responsible

advertising

purchasing

action

BERENTZEN-GRUPPE
MARKETING
CODE OF CONDUCT



BERENTZEN-GRUPPE
Thirst for life



Content

- 3 Introduction and objectives of the Marketing Code of Conduct**
- 3 Introduction
- 4 Objectives
- 5 Scope**
- 6 Our marketing principles**
- 6 Laws and guidelines
- 7 Responsible approach to alcohol
- 10 Consumption of sugar in moderation
- 11 Awareness of the effect of performance-enhancing functional drinks
- 12 Compliance with and implementation of the Marketing Code of Conduct**
- 13 Entry into force of and amendments to the Marketing Code of Conduct**
- 14 Independent agency and reporting breaches**

Introduction and objectives of the Marketing Code of Conduct

(1) Introduction

The Berentzen Group¹⁾ is a broad-based beverage company operating in the following three segments: Spirits, Non-alcoholic Beverages and Fresh Juice Systems. The Berentzen Group is one of the oldest producers of spirits in Germany with a corporate history going back over 250 years. Today, it has a presence in more than 60 countries around the world with well-known brands like Berentzen and Puschkin and attractively priced private label products. In its Non-alcoholic Beverages segment, the corporate group produces mineral waters, carbonated and non-carbonated soft drinks under its own brands and also boasts more than 50 years of experience in the franchise business for soft drinks, currently acting as franchisee for the Sinalco brand. In addition, the Berentzen Group markets innovative fresh juice systems under the Citrocasa brand in its third segment, thus serving the fast-growing market for modern, health-oriented drinks. The Berentzen-Gruppe Aktiengesellschaft share (ISIN DE0005201602) is listed on the regulated market (General Standard) of the Frankfurt Stock Exchange.

Corporate responsibility in terms of economy, ecology and society forms the basis for our actions. This responsibility should be met consistently by all participants involved in the value added chain and marketing for products of companies in the Berentzen Group. This Marketing Code of Conduct defines the minimum requirements for marketing in the Berentzen Group.

¹⁾ The Berentzen Group includes Berentzen-Gruppe Aktiengesellschaft and its subsidiaries, each of which is individually or jointly also referred to as "company" or "companies".

(2) Objectives

We are proud of our products, which provide enjoyment and a little joie de vivre. Unless consumed in moderation, however, alcoholic and sugary drinks in particular can have harmful effects on consumer health. As a drinks manufacturer, we therefore have the societal responsibility of promoting and advertising our products responsibly. To meet this responsibility to the people who enjoy our products, we have set out guidelines for product-related communication.

Our Marketing Code of Conduct was established in order to set out guidelines for product-related communication. The basis for compliance with our Marketing Code of Conduct is that it is communicated regularly to employees²⁾ and marketing and communication partners.

We are entering into this obligation because we are convinced that it is the right thing to do and believe that implementation of our Code will contribute to the long-term success of the Berentzen Group.

²⁾ For better readability in particular, this Marketing Code of Conduct does not use gender-neutral distinctions. In accordance with the principle of equal treatment, any terms used refer to all genders; this also applies with respect to all other gender-specific terms used.

Scope

The Marketing Code of Conduct applies to all companies and employees of the Berentzen Group, all marketing and communication partners and all activities and measures in the area of marketing.

Our marketing and communication partners include, for example:

- Agencies
- Distributors
- Cooperation partners
- Freelancers
- Promoters

In this Code, the term “marketing” describes all measures, both internal and externally commissioned, that serve to market our products and aim to increase unit sales. These include, for example:

Advertisements for end consumers via various media/channels (e.g. TV, digital media/ social media, brochures, radio, promotions,...)

- Specialist press and advertising to a specialist audience
- Packaging
- Product innovations
- Sales promotion materials and measures
- Sponsorship measures

³⁾ In terms of this Code of Conduct, the term also includes executive body members unless a specific distinction is made.

Our marketing principles

(1) Laws and guidelines

Marketing in the Berentzen Group must be in line with the respective national laws. These take precedence in the event of any conflict with this Marketing Code of Conduct.

Marketing must also comply with all other relevant codes, e.g. the Code of Conduct and the Supplier Code of Conduct, and any other pertinent guidelines in the Berentzen Group.

Marketing in the Berentzen Group is based on the code of conduct of the German Advertising Standards Council (Deutscher Werberat) as amended, in particular:

- Fundamental rules on commercial communication
- Derogatory and discriminatory behaviour
- Children and young people
- Food
- Alcoholic beverages

That code of conduct forms the base for the marketing and is completed by the Marketing Code of Conduct and by the respective voluntary industry commitments that apply.

(2) Responsible approach to alcohol

(2.1) Abstinence and moderation

Our marketing exclusively presents a responsible approach to and moderation in relation to alcoholic beverages. Alcohol consumption is not portrayed as harmless, nor are consumers encouraged to consume excess amounts of alcohol. Every adult is free to decide whether and when to drink alcoholic beverages. We always honour and respect this decision.

We strictly oppose the consumption of alcohol in connection with road users. Adverts are therefore not permitted to suggest that the consumption of alcoholic beverages before or while operating any type of vehicle is acceptable. This also means that we do not advertise around vehicles.

Alcohol and work do not mix. As a result, our marketing measures do not portray alcohol at work. Alcohol is strictly prohibited in the companies of the Berentzen Group. The only exception relates to company events and necessary tastings as part of carrying out work duties.

We consider that alcohol and active sport do not mix. Consequently, we do not sponsor any active sporting events for the marketing of spirits.

We are strictly opposed to the consumption of alcohol in pregnancy. As a result, our advertising does not target or depict pregnant people.

(2.2) Targeting adults

Our communication only targets adults. All of the persons appearing in our marketing are adults and look like adults. Merchandising measures will not involve handing out any items that are usually used by minors.

The language, music, images and symbols that we use in our products and communication target adults, and we communicate via media that are mainly used by adults. We provide special protection for young people when marketing our products online or via mobile offerings. To access our brand websites, all users must enter their date of birth. The digital measures on our social media pages also require a date of birth to be entered. All content placed on our proprietary websites and posted on our social media channels by external users is reviewed regularly.

Any of our proprietary events that involve serving alcohol can only be attended by adults. We carry out strict ID checks at the entrances. For promotions, our event partners are contractually required to ensure that child protection laws are observed. Many of these measures are implemented for us by service providers, and we monitor these at regular intervals. Warnings are issued in the event of any infringements. Repeated infringements lead to termination of the business relationship.

(2.3) Alcohol content

The type and alcohol content of beverages must be declared clearly and unambiguously. Advertisements must contain information for the consumer on the alcohol content. However, a high percentage of alcohol should not be the main emphasis for a product in any communication. Equally, it is not acceptable to create an impression that the consumption of beverages with a low alcohol content prevents abuse or reduces the possibility of abuse.

Alcoholic beverages and related marketing measures must be clearly distinguishable from non-alcoholic beverages and related marketing measures. Reference to the alcohol content must be made on an easy-to-see bottle and in an appropriate font size in order to ensure good readability and make it clear that the beverage contains alcohol.

(2.4) Pictogrammes

On our branded spirits and in our marketing measures, we communicate our stance of “Responsible enjoyment from the age of 18” using “18+” pictogrammes and/or pictogrammes or texts that refer to the respective local legal drinking age (LDA) for drinking spirits. We also use the “don’t drink and drive” pictogramme to show that alcohol and operating vehicles do not mix.

All bottles of our branded spirits bear a pregnancy pictogramme that refers to the health risk from consuming alcohol in pregnancy.

Where spirits are bottled for third parties, we endeavour to use our influence extensively to ensure that the pictogrammes are displayed on the products.

(2.5) Responsible consumption of alcohol

We observe the generally accepted fundamental values of society regarding ethics and decency and do not show any scenarios implying that alcoholic beverages lead to success or more acceptance in society, at work, in sport or in private life. Our alcoholic beverages do not suggest any therapeutic, performance-enhancing or health-promoting effects.

On the products themselves, in our marketing, communication and promotions, we make it clear that we do not condone or tolerate excessive or abusive alcohol consumption.

At our promotions, we do not serve alcohol to anyone who is clearly already intoxicated, and we do not support any events that focus on excessive alcohol consumption (e.g. “flat-rate parties”).

(3) Consumption of sugar in moderation

Among other things, the product portfolio of the Berentzen Group includes healthy and functional beverages such as mineral water and isotonic drinks. By offering fresh juice systems, we promote healthy living.

However, the product portfolio also includes drinks that contain sugar. Unless consumed in moderation, these can be a factor in obesity and other diseases. Consequently, the objective when producing lemonades is that all new proprietary products developed in the Berentzen Group either have a lower sugar content than existing products or have a reduced sugar content by using sugar substitutes.

We determine which recipes for our branded products can be created using less sugar. Wherever possible, the Berentzen Group endeavours not to use sugar or artificial additives such as colours, preservatives etc. (clean label policy). Particularly when developing new proprietary products, this endeavour is at the heart of our activities.

(4) Awareness of the effect of performance-enhancing functional drinks

Our group also produces beverages with a stronger focus on functional aspects (energy drinks, drinks containing caffeine). Unless consumed in moderation, these products can also have negative effects on consumer health. Consequently, we endeavour to raise consumer awareness by putting notices on the packaging and to provide information to raise awareness of the problem of excessive use.

Compliance with and implementation of the Marketing Code of Conduct

The employees of the Berentzen Group and all marketing and communication partners are obliged to observe this Marketing Code of Conduct and the marketing principles contained herein.

All marketing measures must comply with the Marketing Code of Conduct. Marketing and communication partners that work for us are contractually obliged to observe the Marketing Code of Conduct within the scope of their activities for the Berentzen Group.

If the Berentzen Group becomes aware of breaches of the Code or parts hereof, it reserves the right to end the business relationships.

In the case of queries in connection with understanding or interpreting this Marketing Code of Conduct, employees of the Berentzen Group can contact their respective manager, the Compliance Committee or the respective marketing department of the Berentzen Group.

Any circumstances that indicate a breach of national and international legal provisions or this Marketing Code of Conduct and the principles contained herein must be reported either to the respective manager, the Compliance Committee, the marketing department or the external agency (anonymous reporting is possible in this case) of the Berentzen Group. Any information will be treated strictly confidentially and whistleblowers do not need to fear any discrimination or reprisal.

Marketing and communication partners can contact their respective contact person responsible internally or can inform the external agency of the Berentzen Group.

It is the responsibility of the Compliance Committee set up centrally at Berentzen-Gruppe Aktiengesellschaft to organize, control and monitor the compliance measures of the Berentzen Group. The Compliance Committee reports directly to the Executive Board.

Compliance with and implementation of compliance measures and thus also this Marketing Code of Conduct is also subject to reviews by the internal audit department, which is likewise set up centrally at Berentzen-Gruppe Aktiengesellschaft.

Entry into force of and amendments to the Marketing Code of Conduct

The Marketing Code of Conduct enters into force on October 15, 2017 and is supplemented by the Code of Conduct and the Supplier Code of Conduct. All of the Codes can be accessed on the corporate website of the Berentzen Group (www.berentzen-gruppe.de/en/).

The Marketing Code of Conduct is subject to an annual review process by top-level management. Amendments, supplements or updates to this Marketing Code of Conduct are at the sole and exclusive discretion of the Berentzen Group.

Independent agency and reporting breaches

In the case of breaches or suspected breaches of the principles contained herein, information can be provided to the external agency set up for this purpose (also anonymously). This agency has been appointed by the Executive Board of Berentzen-Gruppe Aktiengesellschaft to record this information. All information will be treated confidentially.

The contact details for the external agency are as follows:

Prof. Heiko Hellwege
PKF WMS Bruns-Coppenrath & Partner mbB
Wirtschaftsprüfungsgesellschaft
Steuerberater Rechtsanwälte
Martinsburg 15
49078 Osnabrück
Email: heiko.hellwege@pkf-wms.de
Phone: +49 (0) 541 94422 600
Mobile phone number: +49 (0) 160 9442 2032
www.pkf-wms.de
Languages: German, English, French

Information about the publisher

Berentzen-Gruppe Aktiengesellschaft

Ritterstraße 7

49740 Haselünne

Germany

T: +49 (0) 5961 502 0

F: +49 (0) 5961 502 268

E: berentzen@berentzen.de

Internet: www.berentzen-gruppe.de/en/

Publication date: October 15, 2017



**„We are proud of our products, which provide
enjoyment and a little joie de vivre. [...]**

**As a drinks manufacturer, we therefore have the
societal responsibility of promoting and advertising
our products responsibly. “**

