

CONSTELLATION BRANDS, INC.

Global Code of Responsible Practices
for
Beverage Alcohol Advertising
and Marketing



Constellation

PREAMBLE

- Constellation Brands, Inc. (“CBI”) is a producer, importer and marketer of wine, imported beer, malt beverages and distilled spirits. These products are sold by CBI and its affiliates in the United States, Canada, Chile, the United Kingdom, Australia, New Zealand and other parts of the world.
- CBI has developed this *Global Code of Responsible Practices for Beverage Alcohol Advertising and Marketing* (“Code”) to provide guidance to its affiliated companies involved in the promotion of their respective brands, wherever those brands are sold.
- While a single global code cannot cover all specific regulations, policies and social norms in each country, the Code is meant to provide the primary framework for brand promotion including marketing and advertising by CBI and its affiliated companies, its importers, agents and distributors.
- Additions may be made to the 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, their brand communications. The overriding principle of our Code is to market our products to adults in a responsible and appropriate manner. Toward this end, all CBI companies will conduct their advertising and marketing practices in accordance with the provisions 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 companies take special pride in their products and their 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 consumption of their products. CBI companies urge adults who choose to drink to do so responsibly. Nevertheless, it is the obligation of each consumer who chooses to drink to enjoy beverage alcohol products in a responsible manner.
- 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.

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 the Code apply to every type of print and electronic media, including the Internet and any other on-line communications used to advertise or market CBI's beverage alcohol products.
- CBI companies recognize that it is not possible to cover every eventuality, and therefore recognize the importance of observing the spirit, as well as the letter, of this Code. Questions about the interpretation of the Code, CBI companies' compliance with the Code, and the application of its provisions should be directed to the General Counsel of the respective 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 on page 6).
3. Beverage alcohol advertising and marketing should be placed in broadcast, cable, radio, and print communications only where at least 70 percent of the audience is reasonably expected to be above the legal purchase age (determined by using reliable, up-to-date audience composition data).
 - To facilitate these placement commitments, recognized electronic and print 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 past placements should be undertaken to verify that past advertising placements were in compliance with this Code and to take appropriate, corrective action for future placements.
4. Appropriate measures and best efforts should be taken so that beverage alcohol advertising and marketing does not appear at events unless at least 70 percent 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 70 percent 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 inside licensed retail establishments located on such campuses.
7. Beverage alcohol advertising should not be placed on any outdoor stationary location within 500 feet of an established place of worship or an elementary school or secondary school except inside a licensed premise.
8. No brand identification – including logos, trademarks or names – should be used or licensed for use on toys, games, or game equipment, or other items intended for use primarily by persons below the legal purchase age.

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.
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 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 products should not be advertised or marketed on the comic pages of newspapers, magazines or other publications.
5. 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.
6. 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 25 years old, substantiated by proper identification and should reasonably appear to be over 21 years of age.

WEB SITES

7. Age verification mechanisms should be employed for CBI company-controlled beverage alcohol advertising and marketing Web sites.
8. 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 Web sites without

their supervision, CBI will provide those parents and the manufacturers of parental control software, upon request, the Web site address of each CBI company so that the parent or manufacturer can use this information.

9. CBI companies with Web sites must comply with the rules for Web sites set forth herein, since Web sites can be accessed from any country.

SOCIAL RESPONSIBILITY

- IO. 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.
- II. 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.
12. 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.
13. Beverage alcohol advertising and marketing materials should not contain any curative or therapeutic claim except as permitted by law.
14. 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.
15. Beverage alcohol products should not be advertised or marketed in any manner associated with abusive or violent relationships or situations.

16. Beverage alcohol advertising and marketing materials should not imply illegal activity of any kind.
17. 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.
18. Beverage alcohol advertising and marketing materials should not be associated with antisocial or dangerous behavior.
19. Driving while intoxicated is against the law. Beverage alcohol advertising and marketing materials should not portray, encourage or condone driving any motor vehicle while intoxicated.

GOOD TASTE

20. Our brands are sold in hundreds of countries and territories around the world. Given cultural sensitivities among countries, it is difficult to develop a global definition for beverage alcohol advertising and marketing. We expect our marketing teams and our agencies to be aware of this and to ensure that our global and local brand communications do not contain any images, symbols or figures which are likely to be considered offensive or demeaning to gender, race, religion, culture or minority groups.
21. Beverage alcohol advertising and marketing materials should reflect generally accepted, contemporary standards of good taste.
22. Beverage alcohol advertising and marketing materials should not degrade the image, form, or status of women; men; or of any ethnic, sexually oriented, religious, or other group.
23. Beverage alcohol advertising and marketing materials should not contain any lewd or indecent images or language.

SEXUAL PROWESS AND SEXUAL SUCCESS

24. Beverage alcohol advertising and marketing materials may depict affection and amorous gestures or other behavior 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

25. On-premise promotions sponsored by CBI companies should encourage responsible consumption by those adults who choose to drink and discourage activities that reward excessive/abusive consumption.
26. Where supplier sampling is permitted, CBI companies should ensure that appropriate measures are employed to safeguard against underage drinking.
27. CBI companies should not promote or encourage any drinking in conjunction with reckless and/or irresponsible behavior at any promotion sponsored by, or participated in, by CBI companies.

ALCOHOL CONTENT

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

SOCIAL RESPONSIBILITY STATEMENTS

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

MANDATORY INTERNAL COMPLIANCE PROCESS

1. CBI companies have established an internal process to ensure compliance with the 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 the Code.
2. All companies must enforce Code compliance. If there is no local CBI Legal Department, counsel must be sought from the persons identified for each business segment noted below:
 - Constellation Wines, Ron Fondiller
 - Constellation Beers and Spirits, Liz Kutyla-Miner
3. CBI companies must provide a copy of the Code to advertising agencies, media buyers and other external consultants involved in each company's advertising or marketing activities.
4. Any criticism or controversy regarding a CBI company's marketing or advertising initiatives must be reported immediately to CBI's External Affairs Department in Fairport, N.Y. Local managers and the External Affairs Department will determine if any steps need to be taken to avert a violation of law or of this Code, or a risk to CBI's reputation.

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Constellation

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