

2025



Pernod Ricard Ethical Marketing & Sales Policy

GOOD TIMES
FROM A GOOD PLACE.





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Sustainability at Pernod Ricard



As **Créateurs de convivialité**, we bring people together around the world to create moments of celebration that transcend cultures and generations.

Our heritage, rooted in the vision of our founder Paul Ricard, continues to thrive because of our unwavering commitment to the well-being of our employees, our communities and the land we all share.

Good Times from a Good Place is the Sustainability & Responsibility strategy we launched in 2019 to ensure that we operate in a way that minimises our impact on the environment, supports people throughout our value chain, and fosters a culture of balanced and convivial drinking.

From the soil of our terroirs to the final sip, we integrate sustainability across our entire value chain.

Responsible conviviality



“

At Pernod Ricard, we are proud of our brands and the creativity that drives our global communications. At the same time, we recognise the importance of promoting responsible consumption and the need to address risks such as excessive drinking, drink driving and underage drinking.

As a responsible industry leader, we are committed to maintaining the high standards in the content and placement of our commercial communications.

This commitment extends across all platforms, particularly in today's rapidly evolving digital landscape.”

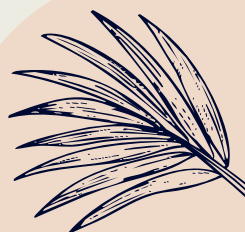
Alexandre Ricard

Chairman and CEO of Pernod Ricard



Since 2007, our Code for Commercial Communications (CCC) has ensured that our commercial communications promote responsible consumption and do not encourage or condone misuse.

This commitment is central to protecting consumers and maintaining our legitimacy as a responsible industry leader. Responsible marketing and sales are fundamental to the way we do business. All commercial communications must fully comply with applicable national laws, industry regulations and principles of fair competition and ethical conduct. They must be developed with a strong commitment to social responsibility, decency and integrity. Where local laws and the CCC differ, the highest standard will always be applied.



Responsible marketing



Our commitment to responsible marketing

Our commitment to setting high standards for the responsible marketing of alcoholic beverages means that we consistently apply and continually review our CCC to ensure that we deliver a brand experience focused on conviviality and responsibility.

This commitment is based on three key actions:



Promote responsible consumption through our marketing practices



Ensure transparent **sustainability claims**



Enforce legal and ethical commercial communications through governance and training

Promote responsible consumption through our marketing campaigns

Pernod Ricard promotes responsible drinking through education, transparency and awareness campaigns, and is committed to continually strengthening online safeguards to prevent underage audiences from being exposed to alcohol advertising and ensure that digital platforms use robust age verification methods.

Our marketing communication tools must:



Have clear and visible messages encouraging balanced and convivial drinking



Not use visuals that show or imply excessive consumption



Not associate alcohol with health, social or sexual benefits, or encourage risky behaviour such as drinking and driving



Target and appeal only to adult audiences

By promoting responsible consumption in our commercial communications, we go beyond compliance with laws and regulations and operationalise the ambitions of our policy to promote consumer protection and ensure ethical, compliant and trustworthy marketing practices.

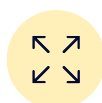
Ensure transparent sustainability claims

We are committed to making clear, accurate and verifiable sustainability claims in all our marketing communications.

All our sustainability claims must:



Be specific, factual and easy to understand



Avoid misleading or exaggerating environmental or social impacts



Clearly distinguish sustainability benefits associated with specific products, processes or initiatives, without implying broader impacts

By being transparent in our sustainability messaging and approving them globally we build consumer trust, prevent greenwashing and align with our broader commitment to responsible business practices.

Enforce legal and ethical communications through governance and training



Pernod Ricard maintains strict compliance protocols to ensure that all commercial communications meet legal and ethical standards. These are integrated into all marketing activities and serve the company's broader objectives of sustainability, ethical leadership and long-term business success.

Governance

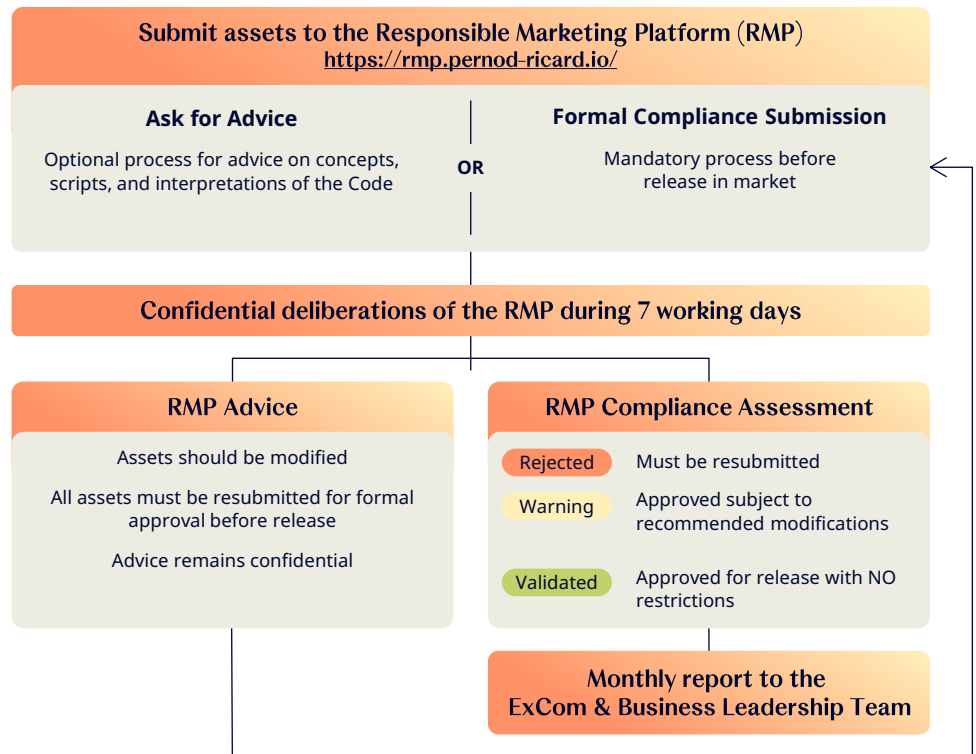
All communications must comply with the highest applicable standards of:

- The Code for Commercial Communications (CCC)
- Applicable national laws and international regulations
- Global Sustainability Claims Guidelines

To ensure full compliance with the CCC, all commercial communications must follow a structured review process by the Responsible Marketing Panel (RMP):



Approvals



Training

- All employees on permanent and fixed term contracts in Legal, Communications / Public Affairs / S&R, Marketing and Trade Marketing functions receive mandatory online training on the CCC when they join Pernod-Ricard.
- Communication and advertising agencies also receive online training on the CCC, ethical marketing practices, and local regulations.
- Employees in relevant functions receive regular refresher courses.



Performance and monitoring

Responsible marketing at Pernod Ricard is monitored through a set of collective measures that ensure consistent evaluation, continuous improvement and full compliance with national and international regulations and the CCC.

Objectives:



Zero complaints upheld by regulatory or self-regulatory bodies against the Group's marketing campaigns



100% CCC e-learning completion rate



95% compliance with the IARD Digital Guiding Principles

Responsible sales

Our commitment to responsible sales

Our commitment to setting high standards for the responsible sale of alcoholic beverages means that we apply strict guidelines and continually review our practices to ensure that our sales activities are consistent with ethical, legal and social responsibility principles.



This commitment is based on two key actions:

Prevent sales to minors by implementing strict age verification processes and ensuring that our sales practices do not target minors.

Ensure sales compliance and accountability by conducting regular audits and enforcing responsible sales policies across all channels.



Prevent sales to minors

Pernod Ricard, in collaboration with other **International Alliance for Responsible Drinking (IARD)** member companies, works with global and regional online retailers, e-commerce platforms and delivery services to improve responsible sales practices and raise global standards.

This commitment is implemented through:

Age-gating on all Pernod Ricard consumer-facing websites to restrict access to minors.

Adherence to the IARD e-commerce standards to ensure responsible online sales and delivery of alcoholic beverages on B2C platforms.

Measures to **prevent sales to minors**, which is central to promoting ethical sales practices internally and externally.

These efforts support responsible consumption, help maintain high ethical standards, regulatory compliance and stakeholder trust, as well as mitigate reputational risks and align with the company's sustainability goals.

Ensure sales compliance and accountability

Pernod Ricard proactively monitors and reinforces responsible distribution practices. Through targeted initiatives, we ensure compliance with regulations, industry commitments and internal policies and guidelines, while supporting our partners in implementing effective safeguards.

Key initiatives include:

Compliance audits of B2C platforms' digital safeguards (scheduled and ad hoc) to assess responsible selling practices across markets and partners.

Mystery shopper programs to verify compliance with age verification requirements.

Best practice sessions with IARD to reinforce industry standards and promote responsible sales practices.

These measures help ensure consistency across our channels.

Performance & monitoring



Responsible sales are monitored through a structured set of measures that ensure compliance, protect minors and comply with national and international regulations.

Objectives:



100% of consumer-facing websites age-gated



Full compliance with the IARD e-commerce Standards

Governance, implementation & dissemination



Governance

The Public Affairs team oversees the implementation of this policy, under the leadership of the VP Public Affairs & Drinking in Society. The Global Responsible Marketing and Sales Director oversees the process and its application across the Group.

The RMP, in collaboration with key functional teams including the Marketing department, ensures compliance with the CCC and other relevant guidelines. The RMP conducts reviews, provides guidance and validates campaigns to ensure compliance.



Implementation

The Marketing, Communications, and Sales teams, supported by the Legal team are responsible for integrating the policy into daily operations, training stakeholders, and ensuring compliance at all organisational levels.



Dissemination

The policy is disseminated through internal digital platforms (My Portal, RMP Platform), mandatory training modules, and operational guidelines, ensuring accessibility for employees and relevant external stakeholders.

Employees and stakeholders can contact the RMP team or relevant departments such as Legal or Sustainability for support or clarification.



Glossary



Age-gating

A digital safeguard that requires users to confirm their age before accessing websites or content related to alcoholic beverages, ensuring compliance with legal drinking age regulations.

CCC

(Code for Commercial Communications)

A set of internal rules designed to enable Pernod Ricard's marketing teams and their marketing agencies around the world to be creative while meeting the highest standards of responsible marketing.

Commercial Communications

Advertising or marketing communications to consumers that increase customer awareness of a product/brand and/or introduce an innovation or new product/brand.

IARD

(International Alliance for Responsible Drinking)

A not-for-profit organisation, supported by the world's leading beer, wine, and spirits producers, dedicated to reducing harmful drinking and promoting understanding of responsible drinking.

IARD Digital Guiding Principles

(DGPs)

Industry standards set by the IARD to govern the responsible online marketing and sale of alcohol, ensuring that advertising does not target minors.

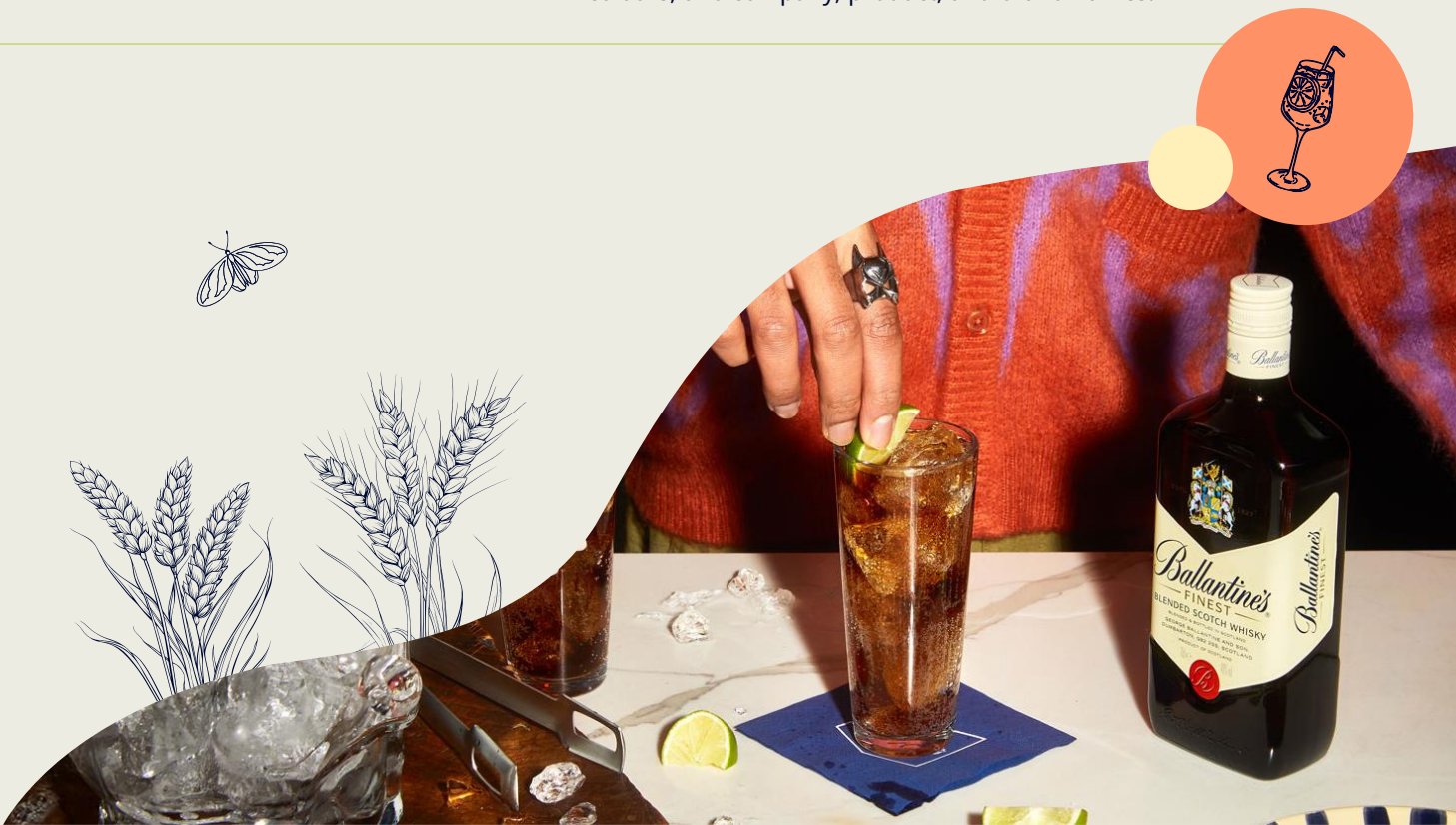
RMP

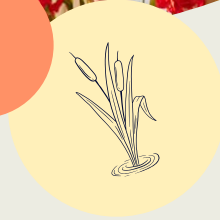
(Responsible Marketing Panel)

A group of senior representatives from different functions and geographies that acts as a global guardian and source of advice on the ethical marketing and sales standards embedded in Pernod Ricard's Code of Commercial Communications.

Sustainability Claims

Claims about the attributes or impacts of a brand, product, or business, including claims that a brand/product or business has no negative, positive, or comparatively better impacts on the environment or people. These claims can be made in a variety of ways, both explicit and implicit, and include all types of textual information, symbols, images, logos, graphics, colours, and company, product, and brand names.





External standards & codes

International codes

ICC Advertising and Marketing Code

Alcohol-specific standards and coalitions

ICC Framework for Responsible Alcohol Marketing, IARD Digital Guiding Principles, IARD Influencer Guiding Principles; IARD Global Standards Coalition; IARD Responsible Innovation in AVNAPs; IARD Global Standards for Alcohol Sales and Delivery, WFA EU Responsible Marketing Pact

National and regional self-regulatory bodies

(e.g. Portman Group (UK), ASA (NZ), ABAC (AU), EASA (EU), Drinks Federation of South Africa)



Thank you!

For any questions, please contact Pernod Ricard Sustainability & Responsibility team at:

sustainability_responsibility@pernod-ricard.com

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Speak
up

Report any breach to this policy, through the Pernod Ricard Speak Up line:

<https://speakup.pernod-ricard.com>

The Pernod Ricard Speak Up line is our global whistleblowing platform, managed by an independent third party. Open to all Pernod Ricard stakeholders, it provides a secure and confidential way to report any irregularity or suspected misconduct in good faith. This system is available 24/7 online or by phone, in several languages.