



## RESPONSIBLE MARKETING POLICY

Anora Group Plc

### Foreword

Anora operates in a demanding and regulated business environment, where responsible business conduct and integrity are essential requirements for the reputation and success of Anora. Our business and products have an impact on the surrounding society, and we are under public scrutiny. Anora must therefore be a good corporate citizen. This is not only good for Anora – it is the right thing to do!

For us, integrity means the highest level of honest and transparent conduct. Compliance with all relevant laws and regulations always sets the minimum level for the way in which we operate. Responsible conduct encompasses how we carry out our daily business tasks and how we treat and respect each other, as colleagues, as managers, and as supervisors.

Anora's commitment to responsibility and integrity is reflected in Anora's [Code of Conduct](#). As a sustainability-focused, innovative, and responsible group of people, we are dedicated to conducting business reliably, fairly, and always following the respective laws and regulations. This Responsible Marketing Policy supplements Anora's Code of Conduct, which has been approved by Anora's Board of Directors.

**Jacek Pastuszka**  
CEO

### 1. Introduction

Anora is the leading wine and spirits brand house in the Nordic region and a global industry forerunner in sustainability. Our three business segments are Wine, Spirits and Industrial. Our market-leading portfolio consists of our own iconic Nordic brands and a wide range of prominent international partner wines and spirits. Our business operations also include world-class industrial operations in distillation, bottling and logistics services. Our key products include wines, spirits, low-alcohol ready-to-drink-products and non-alcoholic drinks. We also provide industrial products from the side-streams of the production process, such as starch, feed components, and technical ethanol for the use by industrial customers.

At Anora, we are dedicated to conducting our marketing activities in a responsible and ethical manner, recognizing the potential adverse social and health impacts our alcoholic drink products can have on society and individuals. In our Nordic core markets, marketing of alcoholic beverages is strictly regulated. As a prominent participant in the wine and spirits industry especially in the Nordics, we commit to upholding the highest standards of responsible marketing, adhering to the guidelines and principles outlined in this policy. We also support and promote a responsible drinking culture.

These guidelines are intended to give you a general understanding of the rules and regulations that apply to alcohol marketing in the geographical areas where Anora operates and how Anora complies with them.

### 2. Guiding principles

The following principles guide Anora's marketing activities throughout the geographical areas in which we operate. Compliance with these principles and this Policy is mandatory. This is Anora's minimum

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standard policy for all external marketing communications. In jurisdictions where local laws are stricter, they supersede our Policy.

## **2.1. Legal compliance and country-specific regulations**

We will adhere to all applicable laws and regulations related to the marketing, advertising, and promotion of our wine and spirits products. Finnish legislation together with the National Supervisor Authority for Welfare and Health's (Valvira) guidelines on alcohol marketing are among the strictest in the EU. In addition to these, we duly respect and consider local laws, regulations and guidelines and apply them in our marketing actions. For example, in Norway where all alcohol-related marketing measures are prohibited, we refrain from marketing our products. All in all, case-by-case consideration in marketing activities is the precept for how we operate.

## **2.2. Audience and contextual placement**

Our marketing communications are targeted exclusively towards individuals of legal drinking age, which is why we do not place marketing in media or contexts that primarily target individuals under the legal drinking age. This includes platforms and content popular among young audiences. We implement age verification mechanisms for online platforms and events for the purposes of ensuring that our messages are only targeted to those of legal drinking age. The use of cartoons, fairy tale characters or youth culture idols or phenomena that attract children and young people is strictly prohibited in our marketing, as is the use and portrayal of minors in marketing.

In addition to minors, we also protect other vulnerable individuals from our marketing, such as those suffering from alcohol misuse. We never target our marketing content at persons to whom alcoholic beverages may not be sold or should not be sold. These include, among others, people who are pregnant. Also, in line with our goal of supporting a responsible drinking culture is our aim of developing no- and low-alcohol beverages to ensure inclusivity for people in different situations and with different preferences. Non-alcoholic options should be available at all events, sales-points, and drinking occasions where we promote our alcoholic products.

## **2.3. Responsible consumption message**

Anora is committed to supporting the development of a modern, responsible drinking culture. We acknowledge that alcoholic products can have negative effects and are meant to be enjoyed responsibly, in moderation and abiding by local age limits. At Anora, we believe in a sustainable and responsible drinking culture, which aims to minimize alcohol-related harm while supporting the positive aspects of enjoying drinks with moderation. We have adopted our statement on advocating responsible consumption with moderation consideration. We take seriously the harm caused by alcohol misuse and are strongly against alcohol use by minors. Additionally, we stress that in all work-related situations, our employees must ensure that their judgement and performance are not impaired by alcohol consumption.

Our marketing campaigns actively promote responsible alcohol consumption. We integrate clear messages that dissuade excessive or irresponsible drinking and encourage moderation. We never portray irresponsible drinking or abundant consumption of alcohol in a positive light and never condemn anyone who chooses not to drink. Any depiction of individuals consuming our products will focus on moderate enjoyment of the quality of our wines and spirits.

Furthermore, we never emphasize alcohol content as a positive characteristic or endorse high alcohol content as such. For example, in an advert we do not give the impression that alcohol content is high compared to price or competing products.

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As a part of advocating the safe use of our products, we share important information on the effects of alcohol consumption and our view on how we can build a modern, responsible drinking culture. More information can be found [here](#).

The packaging is our most direct way of communicating with consumers. The majority of the packaging of our alcoholic products has a “Drink responsibly” call for action or link to a local or European website with information on alcohol and moderate enjoyment, such as: <https://responsibledrinking.eu>. Also, spirits packages have information about the quantity of one service and the amount of energy it contains.

## **2.4. Avoiding glamorization**

Firmly linked to the previous principle, our marketing does not glamorize alcohol consumption, depict excessive consumption, or associate alcohol with success, popularity, or attractiveness.

We do not imply that drinking alcohol will make a person more successful or socially acceptable and we ensure that our advertising does not give the impression that alcohol increases functional capacity or makes one socially or sexually more successful or attractive.

Additionally, we make sure that our advertising does not give the impression that an alcoholic beverage or its ingredients have medical or therapeutic properties, or that they help prevent diseases, or solve conflicts.

## **2.5. Sensitivity to diversity**

We are sensitive to cultural norms and values in our marketing materials, as we do not want to offend or disrespect any community.

We are also respectful of gender and other forms of diversity and avoid the use of stereotypes in our marketing. Further, we always aim to portray the characters and individuals in our commercial communications in a decent, positive, and mindful way.

We strive to actively promote inclusion and diversity in our advertising. We have zero tolerance for depicting discrimination, or anything that is likely to harm a particular group of people based on religion, ethnical background, gender, identity, sexual orientation, nationality, age or similar.

## **2.6. Accuracy and transparency**

We do not use inappropriate methods in our advertising or give untruthful or misleading information about alcohol, its use, effects, or other properties. We always strive for accurate and transparent marketing communications. We will not engage in misleading or deceptive advertising practices.

We stand behind truthfulness and require that all fact statements presented in adverts are verified.

We are focused on increasing the transparency of our product information (nutritional data and ingredients) and in the jurisdictions where such information is allowed to be displayed to consumers, the information is available on [anoraproducts.com](http://anoraproducts.com).

## **2.7. Social and environmental responsibility**

We communicate initiatives that highlight our commitment to environmental sustainability and social responsibility, showcasing our efforts to minimize our environmental footprint and support the communities in which we operate. Anora’s sustainability roadmap has three main focus areas – Planet, People and Product – and it has been designed to cover all aspects of sustainability while further developing our strengths. We want to be best in class in sustainability in our industry. The environment is a cornerstone of our corporate responsibility work, and we develop our production plants and create more climate-smart packaging options with the aim of minimizing their environmental impact. Equality and diversity are at the core of our organisational culture, and we want to ensure an inclusive and safe workplace. Through educative programmes and by developing no- and low-alcohol products we promote a responsible drinking culture.

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We take the issue of greenwashing seriously and require that all claims and statements relating to the environment and eco-friendliness of our products and activities are truthful and follow the relevant regulations and guidelines. We make no unfounded promises or exaggerated claims about our products and activities and always aim to provide transparent and comprehensive information about them. We closely monitor the progress of the EU *Directive on substantiation and communication of explicit environmental claims (Green Claims Directive)* and adapt our marketing activities accordingly.

## **2.8. Fair treatment of competitors**

Our marketing is focused purely on what we do and what we offer. We do not engage in comparative marketing. We do not mention our competitors' products in our marketing, and we certainly do not portray our competitors nor their products in a bad light. Denigration is unacceptable and against our way of operating.

## **3. Implementation**

Anora requires everyone involved in the marketing and sale of our products (including our partner brand products) to implement this Policy. This concerns not only Anora's employees but also suppliers, subcontractors, licensees and third-party distributors. To ensure effective compliance, the following measures are implemented:

- All business, communications, and legal team members, marketing agencies and others involved in the marketing and selling our products shall familiarize themselves with this Policy.
- When working with relevant third-party partners, such as distributors, suppliers, agencies or similar, we strive to ensure that they understand and comply with this Policy.
- Legal should be involved as early as possible in any marketing or commercial communication where there are potential risks of non-compliance with this Policy to provide timely guidance.
- We take complaints regarding our marketing and other commercial communications seriously. We properly address and store all complaints for audit and record keeping purposes.

### **3.1. Application of other guidelines**

In addition to this Policy, and previously referred regulations and guidelines, we have integrated spiritsEUROPE's Guidelines for the Development of Responsible Marketing Communications (dated February 2022) into our marketing practices and materials, underpinning our commitment to responsible marketing.

### **3.2. Associations and campaigns**

Anora is a member of industry associations, such as the Association of Norwegian Wine and Spirits Suppliers (VBF) in Norway, the Spirit and Wine Suppliers Association (SVL) in Sweden, the Finnish Food and Drinks Industries' Federation (ETL) in Finland and the Association of Finnish Alcoholic Beverage Suppliers (SAJK) in Finland. SVL and SAJK are members of spiritsEUROPE and share valuable insights regarding regulations in Europe and best practices of the industry worldwide in building a responsible drinking culture and also drive educational initiatives such as the Talk about alcohol programme.

Through these associations, Anora supports several "beyond the law" programmes. In Norway, Anora has been supporting Ung Dialog with responsible drinking campaigns aimed at students. In Finland, Anora has been supporting Raiteen tuki, an educational programme for schools aiming at preventing underage alcohol use. We support the Talk about Alcohol campaign, which is used by 75% of primary schools in Sweden and is available also in Finland and the Baltics.

### **3.3. Internal education**

As a producer of wine and spirits products, we recognize that we must market our products responsibly and in compliance with applicable marketing laws and regulations in our marketing and sales channels.

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We distinguish between the personal and professional use of social media and act in a correct and professional manner.

We comply with Anora's [Code of Conduct](#) and require that every employee completes and successfully passes an online course on the Code when joining the company.

In addition, we are committed to Anora's [Responsible Sourcing Practices](#) as well as Anora's [Quality, Safety and Environment Policy](#) that is based on UN Sustainable Development Goals.

For internal purposes, we have implemented Anora's Internal Marketing Guidelines, that we require all employees involved in the marketing of Anora's products in any way to be familiar with. Related to this, Anora has an e-learning course regarding marketing regulation that must be successfully completed by all employees involved in the marketing of Anora's products. In addition to marketing regulation training sessions held by Anora's legal team for employees working in marketing, our organisation has an open and collaborative organisational culture that supports the legal team's involvement in marketing campaigns already from the planning stage, when necessary.

We have put in place internal Social Media Guidelines that every new employee is required to familiarise themselves with when they join the company. We conduct ongoing internal training through various intranet publications on current topics related to, for example, promoting a responsible drinking culture both inside and outside the company.

## 4. Continuous improvement and stakeholder engagement

We are committed to continuously improve our responsible marketing practices. We actively engage with stakeholders to foster dialogue and gain insights into the evolving expectations and challenges related to responsible marketing. By listening to the views of consumers, employees, regulatory bodies, and industry peers, we adapt our activities accordingly.

## 5. Conclusion

This Responsible Marketing Policy, supplemented with the SpiritsEUROPE guidelines, enforces our commitment to ethical and responsible marketing practices. By aligning our activities with these principles, we aspire to nurture a responsible drinking culture characterised by moderation and respect for personal choices and needs, ensuring the well-being of consumers and contributing positively to society.

This Policy is effective as of 23 November 2023 and will be periodically reviewed and updated in line with evolving industry practices and regulatory requirements.

This Policy and further information can also be found at <https://anora.com/en/sustainability/policies>

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Policy owner: Communications Director

Approving body: Chief Executive Officer