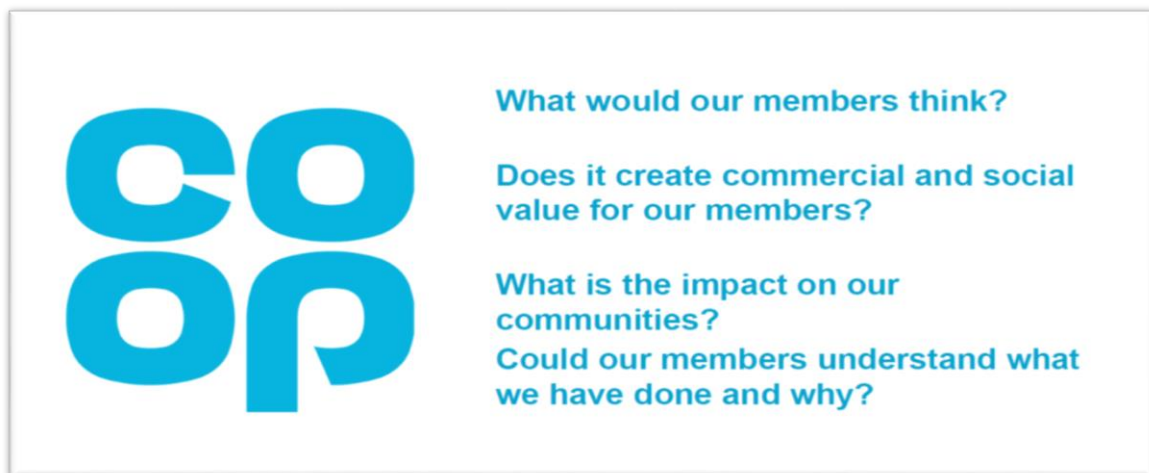


Co-op Advertising Policy

This policy explains the Co-op's approach to advertising which ensures the decisions we take reflect our values and principles as a co-operative. This policy document sets out three policy principles which, together with the Co-op Ethical Decision Making Tool, will guide the individual decisions which need to be made in specific cases.

The Co-op is a major commercial organisation with the sixth biggest food business in the UK, the largest funeral provider in the UK, a major general insurer and a legal services business. However, we are more than a business because we are part of the international co-operative movement and we are guided in our decisions by the values and principles of that co-operative movement.

In the Co-op, we ensure we align our decisions with those values and principles by using our Ethical Decision Making Tool which was approved by the Co-op's Board in August 2016 which is set out below.



We have used this Tool to shape our policy in relation to which publications we would spend money to advertise and market. In particular we have kept in view the responsibility of co-operatives in relation to autonomy and independence (fourth principle of co-operation), education and information (fifth principle of co-operation) and concern for community (seventh principle of co-operation). Critically, in developing the policy we carried out research with our members which showed that 92% of members agreed with the fundamental principles set out below.

Therefore, we have drawn out three key policy principles which we apply when new consider in what publications or channels we will advertise in:

- The Co-op will not seek to affect the editorial independence of publications or channels;
- The Co-op will not undermine the value of our society for our members; and

- The Co-op will ensure our values and principles are clear and undiminished regardless of surrounding content.

These policy principles are intended to be guidelines for individual decisions. We recognise that individual publications and channels and decisions to advertise them each carry unique circumstances which need to be treated on a case-by-case basis.

We also recognise that the external environment we operate in is fast-paced and changes in that external environment need to be reflected in our policy and how it is implemented in individual publications and channels. Therefore, we will review both our policy but also critically how we have put it into practice every 12 months to ensure it continues to meet our objectives.

GROUP POLICY AND CAMPAIGNS
THE CO-OP
JUNE 2017