



BITBURGER BRAUGRUPPE

STARKE MARKEN

CODE

of Responsible Product Marketing

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BITBURGER BRAUGRUPPE
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Bitburger Braugruppe is a family business and is today managed by the seventh generation. The company owns the Bitburger, König Pilsener, Köstritzer, and Licher brands. Bitburger Braugruppe also owns the brand and marketing rights to Königsbacher and Nette, as well as the marketing rights to the Benediktiner beers on behalf of Benediktiner Weißbräu GmbH. The company is among Germany's leading breweries.

As brewers, we are dedicated to making an effective contribution to our products being enjoyed in a responsible way. We do so through our commitment to initiatives in the area of alcohol prevention, such as “Don't Drink and Drive,” but also and above all by marketing our products based on clear, binding principles. These principles, some of which go far beyond the legal stipulations (e.g. the German Protection of Young Persons Act and Licensing Act), were first published in Bitburger Braugruppe's Code in 2008. Ever since, the rules contained in the code have been the central guidelines for the daily work of our employees and business partners in the areas of marketing, sponsoring, sales, and corporate communications. These rules apply in conjunction with the “German Advertising Standards Council Code of Conduct on Commercial Communication for Alcoholic Beverages” (www.werberat.de).

The marketing of our products abroad is partly subject to different framework conditions, which we take into account in this version.

Updating and expanding the code is one of the measures introduced in 2013 as part of the development of Bitburger Braugruppe's sustainability strategy. The revised edition of the code published in 2015 ultimately reflected two major changes:

- 1.** With the revised code, we are making our rules fit for the demands of the digital communication channels. For example, the code now includes guidelines for the interaction with consumers and on youth protection on social media platforms.
- 2.** In recent years, we have consistently expanded our range of nonalcoholic beverages. It is therefore all the more important to have definitive rules in place governing the marketing of these products to target groups below the legal age of consuming alcohol in the respective country.

This, the third edition of the code, has been updated and converted into a handy pocket-sized format. It came into force on August 1, 2019. This code is used as the basis of an obligatory training program for all managers and employees working in marketing, sponsoring, sales, and corporate communications, which helps them to implement the code.



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The code applies for all marketing activities of Bitburger Braugruppe. These include brand advertising; activities relating to product launches; websites; social media platforms; sales promotions in retail, restaurant, hospitality, and catering settings; packaging and labeling; events; sponsoring; and consumer communications.

Bitburger Braugruppe meets diverse customer demands with a wide-ranging product portfolio. In addition to traditional beers and beer mixes, our company offers a growing range of low-alcohol and nonalcoholic beers and beer mixes. Alongside Bitburger Leichtes with 30 percent fewer calories and 40 percent less alcohol compared to a conventional pilsner, we offer, for example, Bitburger Drive 0.0% (non-alcoholic).

In addition, Bitburger Braugruppe offers other nonalcoholic beverages, such as Kandi Malz.

Every product category has its own specific demands in terms of responsible marketing. The fundamental differences arise from the alcohol content and the respective target group. For this reason, in addition to a chapter on marketing and the responsible consumption of alcoholic beverages, the code also contains a chapter with guidelines for the marketing of nonalcoholic beers, beer mixes, and all other nonalcoholic beverages.



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and Responsible Consumption of Alcoholic Beverages:

We are convinced that the responsible consumption of beer is part of a balanced lifestyle. This is reflected in our product marketing.

Principles for responsible product marketing of alcoholic beverages:

- 1.** We never present situations in which beer or beer mixes are consumed excessively or irresponsibly. Furthermore, we never imply that such behavior is acceptable.
- 2.** We do not question abstinence from, or moderate consumption of, beer.
- 3.** We do not present the consumption of alcoholic beverages during pregnancy; our relevant advertising tools are not aimed at pregnant women.
- 4.** We do not create any associations between violent, antisocial, or irresponsible conduct and the consumption of beer. In addition, we do not imply that consuming beer is a prerequisite for social acceptance or for personal, sporting, sexual, or professional success.

5. Our promotional activities do not aim to promote the irresponsible consumption of beer. We do not sponsor any activities such as drinking competitions where speed is rewarded or large quantities of alcohol need to be consumed within a short period.
6. All our websites feature our commitment to, and advocacy of, the responsible consumption of beer.
7. In our catering contracts, we obligate our partners to meet their responsibilities when serving alcoholic beverages.

All of Bitburger Braugruppe's marketing activities for alcoholic beverages must be aligned with the above-named principles. They are complemented by specific, practice-oriented guidelines for specific marketing channels and formats. These are explained in the following pages.

Sponsoring Sports and Cultural Events

We support professional and amateur soccer, as well as regional elite sports and amateur sports. In addition, we also sponsor cultural events. In the context of this support, we also emphasize our nonalcoholic beverages such as Bitburger Drive 0.0%.

Labeling

Alcoholic products are, of course, always clearly labeled with their alcohol content in line with legal requirements. This also applies for nonalcoholic beverages and beer mixes.

Events, Promotional Activities, and Product Samples

All marketing and promotional activities must be aligned with the principle of responsible, appropriate consumption. We never encourage excessive consumption. In this context, we strictly reject drinking games and other activities that encourage fast, excessive drinking, for example:

- Happy hours without any restrictions on the number of discounted beverages
- Speed drinking
- Flat-rate parties/all-you-can-drink parties

For all events organized in the context of marketing activities, these must exclusively be held in locations primarily frequented by people who have reached the legal minimum age for the consumption and purchase of alcohol. Promotional materials must not be distributed in public places, e.g. shopping precincts, market squares, etc., or near schools.

Product samples are intended to provide consumers with the opportunity to taste the superior quality of our products. In this context, attention must be paid to ensuring that the participants in any tastings have reached the legal minimum age for the consumption and purchase of beer in their country. If there is any doubt concerning the age of a specific participant, they must be asked to prove their age by means of official photo identification. If the person in question isn't carrying the requisite proof of age, they must be excluded from the tasting.

Women who are visibly pregnant must not be allowed to participate in the tasting of alcoholic beverages. Product samples must also only be distributed in places where this is legally permitted. Here too, attention must be paid to avoiding the promotion of excessive or inappropriate consumption of alcohol. To this end, anyone who is obviously intoxicated must not be given any further product samples.



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on Websites and Social Media Platforms

The communication and dialogue with our customers is increasingly taking place in the digital realm. Examples of this include our websites such as www.koenig.de, bitburger.com and social media offerings such as the Köstritzer fan page on Facebook® (www.facebook.com/koestritzer), the Bitburger YouTube® channel (www.youtube.com/bitburger), and our Instagram® profile (www.instagram.com/bitburger).

Digital platforms present particular challenges in terms of responsible marketing communication. A particular feature of social media is two-way communication, in which users can post their own content (“user-generated content”) such as status updates and images. Unlike in traditional media, such as newspaper ads, the tone of the communication is deliberately casual and unstructured. Social media platforms also feature a large number of underage users. Against this backdrop, in addition to the general marketing rules, the following rules apply for all digital managers working for Bitburger Braugruppe:

Age Restrictions

All our websites feature age restrictions, requiring the user to actively confirm their age with the click of a mouse. We use the available, platform-specific age restrictions for our social media pages:

- For TV commercials uploaded to YouTube, the “Age restriction” option must be selected (instructions: support.google.com/youtube/answer/2950063?rd=1).
- On Facebook, the age restrictions must be set to “References to alcohol.”
- On Instagram, we refer to age restrictions in our bio.

Transparency

On our websites and social media pages, we use the “Legal information” section to always make it clear that Bitburger Braugruppe is, or our local partners are, the official operator of the respective offering. We never pretend to be a third party or private individual in order to interact with other users.

Creating Posts/ Sharing Third-Party Posts

When creating our own posts and social media profiles or when sharing third-party posts, the following rules must be observed:

- No depiction or acceptance of excessive or inappropriate consumption of beer. This includes, for example, the depiction of drinking games or of people who presumably are heavily under the influence of alcohol, e.g. beer consumers asleep at the table or no longer sitting upright.
- Any person depicted must have reached the legal minimum age for the consumption and purchase of alcohol and have an appearance that clearly reflects this.
- People are only depicted after obtaining their consent, except in such instances where they have provided their prior consent.

User-Generated Content

When we give consumers the opportunity to upload their own content (e.g., images, status updates, etc.) on our social media pages, this content must be monitored regularly by a digital manager. Inappropriate content must be deleted with reference to this code and the applicable code of conduct of the respective platform. The following also applies for images uploaded by users: the external appearance of the persons depicted must give the clear impression that they have reached the legal minimum age for the purchase and consumption of beer in the respective country. In cases of reasonable doubt, images can be excluded from publication.

Code of Conduct (Netiquette)

We have set out standardized codes of conduct in the “Legal information”/“Info” section of our social media pages. In the “Legal information” section, we also provide information on the key principles of our code.

- Please respect each other and use a factual tone. We do not tolerate offensive comments, insults, sexual innuendo, discriminatory statements of any kind, or other patronizing content. Such content must be deleted immediately.
- We are committed to the responsible consumption of beer. For this reason, we explicitly distance ourselves from content that makes excessive or undue alcohol consumption seem socially acceptable. Images and videos that depict children or people below the legal beer-consumption age are also unacceptable to us. We reserve the right to delete content of this nature immediately.
- Please observe copyrights and only publish or share content of your own and for which you hold rights. Please also be aware that Bitburger will not take responsibility or be held liable for content that you publish or for content belonging to third parties. Image material that is officially supplied by Bitburger for social media can be used by our partners on social media channels for the Bitburger brand.
- Our platform is not a place for personal promotion. Commercial posts and advertising for third parties are not allowed. Posts of this nature must be deleted without warning. Comments that are part of a campaign or are generated automatically (e.g., by bots) must be removed.
- Protect people’s privacy: We ask you to ensure that consumers do not publish any personal sensitive data such as addresses or telephone numbers on our pages.



Advertising

In addition to the legally applicable regulations, the platform-specific regulations must be complied with when uploading ads, commercials or other data on social media platforms (e.g., Facebook: www.facebook.com/help/110094445754628; YouTube: support.google.com/youtube/answer/1304652?hl=de&ref_topic=30084).

against the Abuse of Alcohol by Children and Young People

Advertising by Bitburger Braugruppe for alcoholic and nonalcoholic beers and beer mixes is aimed exclusively at people over the legal minimum age for the purchase and consumption of beer.

The Following Measures Support This:

- 1.** We do not use any symbols, images, objects, cartoons, people, music, or language that are predominantly aimed at children or young people under the legal minimum age for the purchase and consumption of beer.
- 2.** All the people depicted in our brand advertising must have reached the legal minimum age for the consumption and purchase of beer in their country and have an appearance that clearly reflects this. This also applies when using promotional teams.
- 3.** We do not advertise in media whose editorial content is predominantly aimed at target groups under the legal minimum age for the consumption of beer. This rule is also binding for our agencies and purchasers.
- 4.** We do not advertise at any event where the majority of visitors have not yet reached the legal minimum age for the consumption of beer.



5. The brand logos for our beers and beer mixes are not used on children's clothing or objects and materials whose target group is expected to be under the legal minimum age for the consumption of beer.
6. Product sampling and promotional activities are not aimed at people who have not yet reached the legal minimum age for the consumption of beer. If there is any doubt, our promotional teams are obligated to demand proof of age and refuse to serve beer and beer mixes to minors.
7. At events sponsored by Bitburger Braugruppe, we offer nonalcoholic drinks to people who have not yet reached the legal minimum age for the purchase and consumption of beer or who do not wish to consume beer.
8. All our websites and other online sales activities demand confirmation that visitors to the websites have reached the legal minimum age for the consumption of beer.

and Potentially Dangerous Activities

- 1.** We do not present the consumption of beer and beer mixes in any direct association with activities or places that present a potential danger, such as driving a vehicle or operating machinery. Drinking and driving is something that we strongly condemn.
- 2.** We do not create any direct association between a potentially dangerous activity and the consumption of beer. This excludes situations in which a participant consumes one of our beers after engaging in such an activity.

and Critical Associations

The majority of consumers associate the responsible consumption of beer with sociability and friendship. In this context, the following guidelines apply when marketing our beers:

- 1.** Our brand advertising does not imply that the consumption of beer is a prerequisite for social acceptance or for social or financial success.
- 2.** Our brand advertising does not present personal, sporting, sexual, or professional success as a consequence of consuming beer.



of Nonalcoholic Beverages

Bitburger Braugruppe is continuously expanding its portfolio of nonalcoholic products and thus offers a wide range of nonalcoholic beverages.

With these products too, there are aspects that we as brewers take account of in terms of responsible marketing, especially in places where children and young people potentially come into contact with our brands.

We distinguish between nonalcoholic beers and beer mixes and other nonalcoholic beverages. This distinction forms the basis of diverging guidelines for our marketing activities.

Nonalcoholic Beers and Beer Mixes

Bitburger Braugruppe categorically forbids the marketing of its nonalcoholic beers and beer mixes to people under the minimum legal age for the purchase and consumption of beer. Children and young people should neither become familiarized with the taste of beer nor be instilled with any brand loyalty towards beer brands.

Other Nonalcoholic Beverages

Other nonalcoholic beverages such as Kandi Malz contain neither alcoholic nor nonalcoholic beer. Although they are predominantly aimed at adult target groups, they are not subject to any fundamental restrictions in terms of marketing to children and young people, pregnant women, or road users.

In situations where nonalcoholic products are placed in environments in which the predominant target group is under the legal minimum age for the consumption and purchase of beer, nonalcoholic beverages may be advertised at the same time.

Example: Nonalcoholic beverages such as Kandi Malz may be advertised in the context of events primarily aimed at minors. In such instances, it is forbidden to also carry out marketing activities for alcoholic and nonalcoholic beer products.

When nonalcoholic beverages are advertised in the context of marketing partnerships or in catering settings as part of nonalcoholic cocktail recipes, our principles for the marketing of alcoholic beverages apply, as do the legal regulations governing the minimum drinking age.



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Compliance with the code is mandatory for all Bitburger Braugruppe employees and is one of the key tasks and responsibilities of management and the directors of marketing and sales at Bitburger Braugruppe. Furthermore, we make our business partners aware of the importance of complying with the code.

All marketing, advertising, and promotional activities in retail, catering, and export must be approved subject to their compliance with the code. This also applies to activities relating to brand launches, market research, consumer communications, consumer marketing, and all other activities we carry out to market our products.

We deliberately avoid delegating responsible conduct to individual departments. The evaluation of marketing, advertising, and sales promotion activities in terms of their compliance with the code and their subsequent approval is therefore the individual responsibility of the person undertaking said activity within the Marketing, Sponsoring, Sales, and Corporate Communications departments.

Agencies, institutes, and external consultants acting on our behalf receive the code as part of their briefing and are obligated to comply with its guidelines during the course of their work.

Furthermore, all employees are made familiar with the correct use of the code during their onboarding.

A training program based on the code is being introduced; this will be mandatory for all managers and employees in all the relevant departments. It will be repeated every two years.

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Bitburger Braugruppe GmbH, Bitburg
Klenk&Hoursch AG, Frankfurt am Main, Germany

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Bitburg 2021