



**Danish Crown**

# **Responsible Marketing Policy**

# Our commitment

## 1. Purpose

The policy expresses our commitment to social, ethical and environmental aspects in advertising our products including but not limited to marketing to children, use of communication & media channels, AI & Marketing, use of claims, sponsorships, partnerships & influencers.

Danish Crown is committed to acting responsibly and to complying with all applicable laws, rules and regulations as well as recognised international standards.

## 2. Scope

This policy applies to all parts of the Danish Crown Group, all company products, concepts, and brands, as well as to all in-house and external media communications/activities/media.

## 3. Targeting

We divide our target groups into three categories:

- Children (6-12 years)
- Teenagers (13-17 years)
- Adults (18 -> years).

We are especially aware of communication that carries messages to children under the age of 13. When communicating directly to them we will be especially attentive to promoting awareness of healthy, balanced and sustainable diets. And when communicating to teenagers we are especially attentive to also encouraging a balanced and healthy lifestyle as well as sharing transparent information about the product that can be easily understood by the target audience. We have taken inspiration on marketing to children and teenagers from the International Chamber of Commerce (ICC) advertising and marketing communication code of 2018 and the ICC framework for Responsible Food and Beverage Marketing Communications of 2019.

## 4. EU Code of Conduct on Responsible Food Business and Marketing Practices

When targeting customers and consumers of all ages, we follow inspirational objective 1 of section 3.1.1. "Promoting food consumption patterns" of the

EU Code of Conduct on Responsible Food Business and Marketing Practices of 2021.

This includes:

### 1. Improved food consumption patterns in the EU

- a. Encourage increased consumption of fruits and vegetables, wholegrain cereals, fibre, nuts and pulses, including locally produced varieties.
- b. Provide/promote more sustainably produced food products/meals (e.g., sustainably produced organic food and higher animal welfare standards)
- c. Improve, where feasible, the nutritional composition and environmental footprint of food products/meals, e.g., through product reformulation and new product development/ innovation
- d. Review and/or offer a range of appropriate portion and serving sizes aimed at sustainable food consumption.
- e. Promote consumer awareness of healthy, balanced, and sustainable diets, including sustainable food consumption, as part of healthy & sustainable lifestyles

### 2. A food environment that makes it easier to choose healthy and sustainable diets

- a. Provide transparent, voluntary product information to consumers, e.g., through digital means.
- b. Apply responsible food marketing and advertising practices, e.g., by adhering to self- and co-regulatory initiatives and standards.
- c. Promote healthy and sustainable food service practices.
- d. Integrate sustainable practices and health in the workplace.
- e. Support local actions to enhance the availability of/access to healthy and sustainable diets for all.

## 5. Communication

Our messaging is always truthful, inspiring, inclusive, respectful, and never misleading.



Furthermore, these messages are always in compliance with the laws and regulations and aligned with group strategies, policies and values.

When using visuals, we make sure that we do not use or alter images in a way that they can be perceived as misleading.

We always give due consideration to the environment and lifestyle in which our products/messages are shown, ensuring that we are not encouraging unhealthy lifestyles of any kind. In that context, consuming alcohol in moderation can be part of enjoyable occasions and can responsibly be enjoyed together with our brands by people over the legal drinking age for alcohol. However, it should never be a centre of attention.

## **6. Act with respect and consideration**

We want to encourage everyone to eat a balanced diet, with a conscious mind to our planet, the people who live on it and all the animals in our care.

We want to ensure that our marketing reflects, and respects generally accepted contemporary standards of good conduct, showing awareness of both the wider society and sensitivity to different cultural, social, ethical and religious groups.

And when disagreements or misunderstandings occur, we encourage dialogue rather than conflict.

## **7. Claims**

Claims<sup>1</sup> must not be misleading, whether dealing with topics like sustainability, health, nutrition, animal welfare, etc. This means that claims should be easily understood and meet the following requirements:

- Clear – a claim should be easily understood and free from misleading information or omissions.
- Accurate – a claim should be truthful and correct.
- Relevant – irrelevant aspects of a product or process should not be emphasised.
- Transparent – information about the documentation on which a claim is based should be easily accessible.

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<sup>1</sup> Claim(s) covers the use of any statements, information, symbols, images, colors, labelling schemes and certificates

Any factual claims must be true and accurate and substantiated with proper documentation. Furthermore, it is important that we do not misuse technical data or use scientific terminology or vocabulary in such a way that we would falsely suggest that a claim has scientific validity.

Before a factual claim can be used in marketing it must be validated by relevant internal subject matter experts and, if necessary, independent third parties.

## **8. Progress and transparency**

It is important that we consistently share clear and understandable information that tells the honest story about our product and our company and not least the progress being made on relevant topics like climate & environmental impact, health, nutrition, and quality.

## **9. Sponsorships, partnerships, and influencers**

When using third party individuals or channels to convey our messages we make sure that their values are aligned with ours and that they can truthfully represent our brands. Furthermore, if their primary audience (+30%) is children under 13 years, the products they promote must encourage awareness of healthy, balanced, and sustainable diets and/or their messages must have educational purposes about sustainability and/or a balanced and healthy lifestyle.

## **10. Channels**

We never advertise in any media known for promoting violence, pornography, gambling, or insulting behaviour.

## **11. Marketing & AI**

At Danish Crown we believe that AI can be leveraged in marketing material, but it is important to prioritize ethical considerations and ensure transparency, fairness, and respect for individual privacy. As such we have formulated the below principles:

1. Responsible use: We believe in the responsible use of marketing AI technologies when developing design, innovations, marketing materials. This

etc., used in the marketing of products and activities to boost sales, directly or indirectly.



includes that consumer are aware when AI is being used in marketing effort.

2. Human oversight: We believe in a human-centered approach to marketing AI that empowers and augments professional designers and marketers. Marketing AI technologies should be assistive, not autonomous.
3. Avoiding discrimination: We commit to never knowingly use generative marketing AI technology to deceive; to produce content to spread falsehoods, misinformation, disinformation, or propaganda. Moreover, we are avoiding biased algorithms that may discriminate against certain demographics or perpetuate existing societal biases.
4. Understanding limitation: We believe in understanding the limitations and dangers of marketing AI and considering those factors in all our decisions and actions in the organization.
5. Protecting consumer privacy: We believe in personalization without invasion of privacy, including adherence to data privacy laws and mitigation of privacy risks for consumers. We respect consumer privacy by collecting and handling data responsible.

By incorporating these principles into both our responsible marketing policy and ways of working we are committed to using ethical AI by balancing mitigating of potential risks and liabilities.

## 12. Governance

A group of senior management executives from across the Danish Crown Group oversees the development of our overall marketing communication and ensures material marketing communication risks are duly considered. Within each business unit, the marketing responsible ensures the implementation of the policy and that all relevant employees are made aware of the policy and its requirements through training and sharing of information. A small team of relevant senior executives within communication and marketing is to handle questions from business units and issues that require immediate action. All relevant marketing employees and marketing / media agencies are trained in the Responsible Marketing Policy. Training material will be made available for all relevant employees and updated regularly.

Across all business units, group functions with expertise in e.g., legal matters, sustainability, food safety etc. are responsible for verifying marketing materials against legal requirements, stakeholder views and industry standards.