



# Code for Responsible Communication and Marketing

Moët Hennessy

# Summary

<b>Why a Code for Responsible Communication and Marketing?</b>	<b>4</b>	<b>Annex I: Digital guiding principles</b>	<b>18</b>
		Age-Affirmation Mechanism (AAM)	20
		Forward Advice Notice (FAN)	22
		Responsible Drinking Message (RDM)	23
		User Generated Content (UGC)	24
		Transparency Statement/ Official Account (TRA)	27
	<b>Scope</b>	<b>Annex II : Influencers Engagement</b>	<b>28</b>
		<b>Guiding Principles</b>	
	<b>Applicable rules</b>	<b>Annex III: Marketing Partnerships</b>	<b>34</b>
Responsible drinking message	9		
Legal age	10		
Inapropriate behaviour	11		
Dangerous behaviour	12		
Cultural specificities & representations	14		
Alcohol and sexuality	15		
Incentive to drink alcohol	16		

# Why a Code for Responsible Communication and Marketing?

## 01



The content of our commercial communications is of critical importance for our reputation and our legitimacy as a responsible stakeholder. Everyone involved in marketing, sales and communication must comply with this Code and ensure that our advertising is also compliant with relevant national laws or codes which must be upheld. In case of conflicts, the stricter guidance at national level must be followed. As a result, Moët Hennessy is committed to respecting a self-regulation code for all its communication and marketing practices (“Code”).

The examples given in the Code are not comprehensive and merely provide guidelines for interpreting the spirit of the Code. Communicators are expected to show common sense in the implementation of the Code and to consider the context, particularities and local cultural traditions.

Moët Hennessy believes that marketing and marketer’s creativity are instrumental in shaping social representations and furthering a positive agenda of responsible drinking, diversity and inclusion and more broadly of sustainability. Communicators should be respectful of diversity of ethnic origin, religion or belief, gender, age, disability or sexual orientation. Throughout the production process of our communication, we will take action to avoid inappropriate stereotypes and actively role model inclusive behaviours towards all groups and voices.

This code applies to all markets and all activities undertaken to advertise and market MH alcoholic beverages:

## 01

All internal or external communication

- Photo / visuals
- Video / film
- Digital / social networks (including influencers)
- Press release / Press kit
- POS Merchandising
- Packaging
- Activation
- Partnership (including influencers)
- Sponsoring (including influencers)
- Product/Ambassador pitch
- Product placement
- Promotion
- Competitions
- Gaming
- Advergames
- Podcasts

## 02

Created by

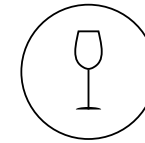
- Our Maisons
- MH Central
- Agencies
- Partners, whether commercial or other
- Subsidiaries
- Distributors, retailers

## 03

Employees, suppliers and partners involved in communications

This Code must be communicated to all employees, all partners and suppliers involved in corporate or marketing communications. They must commit to comply with it. This Code should be included in any contract signed with a third party. Annexing the Code to the contract is not a substitute for the necessary Background Checks, which should be carried out before partnering with external individuals or companies. This Code must be read in conjunction with the Digital and Influencers Engagement Guiding Principles ([Annexes I & II](#)), which lay out in detail the implementation of the 5 following safeguards:

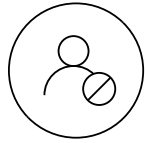
- Age Affirmation Mechanism (AAM)
- Forward Advice Notice (FAN)
- Responsible Drinking Message (RDM)
- Transparency Statement/ Official Account (TRA)
- User-Generated Content (UGC)



# Responsible drinking message

- All communications must contain a message promoting responsible drinking, presented in a legible and horizontal fashion against a contrasting background on all visuals (including videos and webpages).
- If a mandatory message exists (in compliance with the law or with self-discipline practice in the country concerned), it is imperative to use the legal wording. Where this is not the case, the wording of the message can be freely chosen (e.g. "Enjoy responsibly", "Drink responsibly".).

Responsible drinking message	9
Legal age	10
Inappropriate behaviour	11
Dangerous behaviour	12
Cultural specificities & representations	14
Alcohol and sexuality	15
Incentive to drink alcohol	16



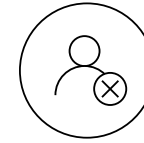
# Legal age

**Our communication must not encourage drinking by young people under the legal drinking age.**

- Our communication must target **only consumers above the legal purchasing or drinking age** in the country in question, whichever is the highest. For global audiences and in countries where there is not a set legal age, our communication must target people over the age of 21.

Our communication will be placed only where a minimum 70% of the audience can reasonably be expected to be older than the legal purchasing or drinking age.

- We must not directly or indirectly encourage drinking by underage people by using images, toys, candies, objects, symbols, music, causes, people or celebrities that primarily appeal to them.
- Our communication must not present the drinking of alcohol as a **rite of passage to adulthood**.
- Models (including muses) used in our communication must neither be nor look under **25 years old**.



# Inappropriate behaviour

**Our communication must not encourage inappropriate behaviour.**

- Our communication must not encourage **excessive or inappropriate consumption** of our products neither in language nor in action (e.g. show alcoholic beverages being handled or served irresponsibly, scenes of debauchery, such as showing someone drinking from a bottle, depicting a large number of bottles for a small group of people, excessively filled glasses, implying around the clock drinking.).
- Our communication must not be **offensive** or violate **human dignity**.



# Dangerous behaviour

**Our communication must not encourage dangerous behaviour.**

## Drinking and driving

- Our communication must never suggest that alcohol can be consumed before and/or while driving a vehicle of any sort (e.g. car, bicycle, motorbike, tractor, boat, jet ski, skateboard).
- A vehicle must not be shown as a party venue. An exception can be made in cases where there is a clear distinction between the passengers and the driver (e.g. limousine, yacht, train) provided that the situation is not risky.

## Alcohol and safety

- Our communication must never suggest that alcohol can be consumed before or during any activity that requires concentration in order to be performed safely (e.g. sport, exams, work, some leisure activities).
- Our communication must not associate the consumption of our products with dangerous situations (e.g. people on an unfenced rooftop, on cliff edges, underwater, with wild animals).

## Alcohol and violence

- Our communication must never suggest that there is a link between alcohol consumption and a violent, aggressive, dangerous or anti-social attitude towards society or oneself (e.g. use of weapons, fighting, condoning terrorism).

## Extending limits

- Our communication must never suggest that drinking alcohol makes it possible to dare to adopt certain behaviours and therefore extends the physical or mental limits of the consumer.

## Alcohol and pregnancy

- Our communication must never associate alcohol consumption with pregnancy nor breastfeeding.

## Illicit behaviour

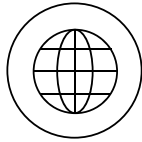
- Our communication must never condone or represent illicit behaviour of any sort.

## Tobacco and drugs

- Our communication must not associate our products with tobacco (including cigars), cannabis and its by-products.

## Other dangerous or antisocial behaviours

- Other dangerous and antisocial behaviours must be avoided (e.g. breaking glass, using the cork as a projectile, drinking games, walking on tables, destructing properties).

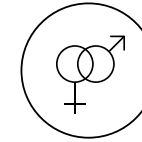


# Cultural specificities & representations

- Our communication must not make any reference to religious or ethnic themes that may be considered as disrespectful to a given community. Our communication celebrates differences, portrays a positive depiction of diversity, and under no circumstance reinforces stereotypes nor incite or condone any form of discrimination, including that based upon ethnic origin, religion or belief, gender, age, disability or sexual orientation. On the other hand, allusions to certain cultural celebrations are authorised in an appropriate context.
- Our communication must not use politics as a platform for communication.
- Our communication must not allude to any recent or historical controversial issues and must be culturally sensitive.



Should you use a specific reference to a culture or a local event, please check with the relevant market.



# Alcohol and sexuality

- Our communication must not show or make reference to **nudity**, nor reveal the body in a shocking, distasteful or erotic way. Our communication must respect commonly accepted rules of etiquette (depicting someone in a bathing costume in a city does not have the same meaning as at the beach).
- Our communication **must not contain or describe implicit or explicit sexual activity**.
- Our communication must **respect local cultural sensitivities**. Be aware that many countries do not tolerate **visuals of physical contact** (such as kissing).
- Our communication must not suggest that drinking alcohol removes or reduces inhibitions, nor that it increases the consumer's appeal, physical capacities or leads to **sexual success**.





# Incentive to drink alcohol

Our communication must not imply beneficial effects for the consumer of drinking alcohol.

- Our communication **must not present abstinence negatively** or imply that there is no alternative to drinking alcohol.
- Our communication **must not compare the characteristics of our products** with those of a **non-alcoholic beverage**, nor suggest that drinking alcohol can quench thirst.
- Our communication should **not suggest that the consumption of alcohol is a requirement for social acceptance or success**.
- Information about the degree of alcohol in our products - whether low or high - should be provided in a clear, factual and neutral manner. The fact that our products contain alcohol should not be presented in itself as the reason for drinking them.
- Our communication must not present the consumption of alcohol as a means of **self-discovery**, nor as a way to overcome boredom, loneliness or other problems.
- Our communication should **not associate alcohol with health nor the medical sector**.
- Our communication must never claim or imply that drinking alcohol may have therapeutic properties or that consumption may help **prevent, treat or cure** human disease or illness.
- Our communication must not make any reference to the **side effects** of alcohol. For example, by suggesting warmth, well-being, disinhibition, loss of control, addiction, dependence or the influence of alcohol.

# Annex I:

## Digital guiding principles

These guidelines apply to all Moët Hennessy brand's digital activities (communications, advertising, creation of account or website or mobile application, advergames, etc.) taking place or made available on any digital media :

- Whether paid or unpaid,
- Whether controlled by a Moët Hennessy brand (e.g. a brand web site, a brand app) or not (e.g. social media, a distributor or third party's website),

These Guidelines are composed of the following 5 safeguards that must be contained in **all online marketing communication**:

- An Age Affirmation Mechanism (AAM)
- A forward Advice Notice (FAN)
- A responsible Drinking Message (RDM)
- A transparency statement/official account (TRA)
- Community guidelines on User Generated Content (UGC) policy



Practical examples on how to implement the 5 safeguards on social media available on <https://the-rmp.eu/digital-controls/>

Age-Affirmation Mechanism (AAM) 20

Forward Advice Notice (FAN) 22

Responsible Drinking Message (RDM) 23

User Generated Content (UGC) 24

Transparency Statement/ Official Account (TRA) 27



# Age-Affirmation Mechanism

Digital media and communications shall in no event target underage persons.

## Principle

Whenever alcoholic beverage marketing communications actively engage a user to directly interact with a brand, our brands must use an Age-Affirmation Mechanism to check that this user is over the country's legal drinking/purchasing age

In practice :

- i) The implementation of an Age-Affirmation Mechanism will vary widely depending on the platform (social media/websites/apps).
- ii) The mechanism should be set either at the country's legal drinking/purchasing age (see here for the list of ages) or 21 years old.

iii) The AAM can either be:

- 1) A field where consumers must enter their birth year
- 2) A field where consumer must enter their full date of birth - day/month/year (compulsory in the USA)
- 3) A login through social media.

iv) Whenever a user's access is denied through an AAM, this user should receive appropriate warning and be redirected to the appropriate responsible drinking website (eg: [www.wineinmoderation.com](http://www.wineinmoderation.com) for wines worldwide; [www.responsibility.org](http://www.responsibility.org) for spirits in the USA, <https://www.drinkaware.co.uk/> for wines and spirits in the UK, [www.responsibleddrinking.org](http://www.responsibleddrinking.org) for spirits in other countries)

You may include a “remember me” feature, provided that: (i) the box is not pre-ticked, and (ii) the following statement is displayed next to the box: “do not tick the box if your device is shared”. Do not forget to parameter accordingly the Cookies management tool and the Privacy and Cookies Notice as the case may be: such cookies being strictly necessary cookies for which data subject consent is not required.



# Forward Advice Notice

## Principle

Whenever MH brands controlled digital platforms allow users to share content, MH brands shall include a Forward Advice Notice (FAN) on the platform, clearly stating that the content should not be forwarded to anyone under legal purchase/drinking age in the country of viewing.

### In practice :

- For media controlled by a Moët Hennessy brand:
  - 1) in the T&Cs, and
  - 2) in pop-up window when there is an attempt to forward a Brand Generated Content: “do not share or forward with people under legal drinking age”.
- For social media: in the profile/section about: “do not share or forward with people under legal drinking age”.

### Focus on videos:

In addition, whenever the Brand Generated Content is a video that is Forwardable by a user, the FAN must appear in the video in a clear and visible way and remain enough time to be fully read.

Note that the Responsible Drinking Message (see section below) must also appear in those videos/day/month/year (compulsory in the USA)



# Responsible Drinking Message

## Principle

Any brand digital communication must include a clearly visible Responsible Drinking Message (RDM) which explicitly advocates responsible drinking.

### In practice, the RDM has to be included:

- on each page (including home page) of a brand’s website and/or application. It should be well visible and readable.
- for social media, the RDM must always be indicated:
  - 1) in the description of the content and/or embedded in the image/video (but never as a “comment” of the content)
  - 2) in the profile/section about

When there is a mandatory RDM (under statutory regulation or self-regulation), you must use such message.



# User Generated Content

Where UGC is solicited, the Terms & Conditions (T&Cs), and the Privacy Notice if needed, must clearly set out what will be done with the User-Generated Content, secure the necessary rights from the user to do what is intended to be done, contain appropriate warranties from the user, and disclose clearly what will be done with any user's personal information.

A notice shall appear saying that all inappropriate User-Generated Content will be removed (e.g. in the T&Cs).

The UGCs policy must clearly state that any user post which condone irresponsible drinking will be removed.

**Ensure monitoring** and in particular for **swift removal of inappropriate User-Generated Content** by the concerned Moët Hennessy brand from any page/space which the Moët Hennessy Maison controls.

All User-Generated Content shall be reviewed and monitored every business day and any questionable User-Generated Content must be removed without delay.

## Focus on monitoring

Monitor the User-Generated Content after it has been published, check all User-Generated Contents at least once every 24 hours and immediately remove any User-Generated Content which violate the rules, including for example the Moët Hennessy Responsible Marketing Code.

- Engage with users and provide them with information when they ask for it or appear misinformed.
- Only comment where you are knowledgeable and add value from a user perspective.
- Never argue with users. If a user seems eager on picking a fight, offer to take the conversation offline/private - if the tension remains within private conversation, refer to communication/marketing director who will refer to Legal if needed.
- Do not censor fair comments by users. If a user is mistaken, correct him politely once and then leave it.
- Correct mistakes you make quickly and transparently.
- Think whether engaging with a comment could create unnecessary attention (e.g., if there is a negative comment on a Facebook page with only 400 users - which is small relative to the user base - do we really want to engage?). Please refer to your communication and/or legal director.



### Principle

Personal data is a very sensitive matter and of the utmost importance for Moët Hennessy. Digital activities must respect user privacy, at all stages. It also implies that personal data shall be processed in accordance with applicable data protection laws and kept secure and protected from loss and theft.

### Guidance :

When a MH brand intends to collect and process personal data, it must inform, before any collection and/or processing, the Legal department and the Data Protection Officer or Local Data Protection Correspondent who has been appointed in each Maison/Market to help to draft appropriate documentation (such as for instance suitable notice and opt in texts to get consent of data subjects, Privacy Policy, Data Processing Agreement with Digital Agency).

# Transparency Statement/ Official Account

### Principle

All communications with users shall be transparent, shall not misrepresent their commercial purpose and shall make it clear it is the official brand page.

### In practice :

Maison/market and influencers must clearly identify any paid/sponsored content as such (e.g. blogs, user comments) and must follow the same standards for dealing with non-paid sponsored content online as done offline. Please refer to the Maison/market Legal department or external legal counsel. Please see [annex II](#) for detailed recommendations about influencers.

# Annex II: Influencers Engagement Guiding Principles

## Purpose

MH Maisons and markets may want to use influencers to promote or relay MH brands, products or events in the digital space.

Moët Hennessy is committed to transparency vis-a-vis consumers and the Influencers Engagement Principles aim to establish minimum standards for all MH entities (Maisons and Markets).

Stricter local regulations or government guidelines would take precedence, as many countries start to regulate such activity to ensure better levels of transparency for consumers.

Local regulations of a country shall notably apply when the influencer has an audience or aims to have an audience of a specific country. The language used by the influencer may be one key criterion to determine if a local regulation must apply.

Failing to comply with these Principles may expose not only the influencer but also MH entities to legal proceedings (civil and/or criminal such as misleading or hidden advertising). In addition, MH brands may face exposure from a public relations perspective, if it is discovered that influencers we work with lack transparency.

# What is an influencer?

Technically, an influencer is an individual who, through his/her audience and influence exercised on his/her audience, might modify consumption behaviors and perceptions towards a brand, product or service (e.g. celebrities, sportsmen, artists, chefs).

In practice, the expression “influencer” regroups several categories of individuals who have in common a certain notoriety, expertise or credibility. Most of the time their influence is exercised on the internet or through social media. We commonly talk about bloggers, youtubers, instagramers...

For the purpose of these principles, journalists are not considered influencers even if they may have a certain influence on their audience. Journalists’ activity (acting as a professional for any media such as press, internet, TV or radio) is usually governed by professional ethics and/or specific legal rules. However, a journalist who would, apart from its professional activity, edit a personal blog or Instagram account could become an influencer for the purpose of these principles.

# Engaging with influencers



Practical examples on how not to deal with influencers on the following link:  
[https://cms.iard.org/IARD/media/Documents/IARD\\_Influencer-how-to-video.mp4](https://cms.iard.org/IARD/media/Documents/IARD_Influencer-how-to-video.mp4)

## Selection of influencers

The Selection of influencers must comply with the following criteria:

Influencers must be 25+ of age when influencers receive remuneration and, in exchange, expressly commits to do or say something for the brand (see § (i) below).

- All paid influencers must use an age-affirmation mechanism on their posts on digital platforms to prevent minors from seeing alcoholic beverage advertising. Where not feasible to use an age-affirmation mechanism, audience of influencers must appear to be composed of at least 70% above the legal drinking/purchasing age; and if no specific country is targeted, the minimum age to be taken into consideration is 21.
- A background check of influencers (including their previous publications or posts, and any press about them) should be done through MH central communication team before any collaboration.
- Paid influencers should be compliant with the MH Code for Responsible Communication & Marketing.



## Nature of relationships & consequences

Dealing with an influencer may cover several situations such as sending a bottle, inviting to an event or monetary rewards, either directly or through an agency, with or without the commitment for the influencer to do or say anything for the brand.

### Three situations are to be considered:

*(i) Influencer receives something (such as money, product, invitation to an event, discount...) AND, in exchange, expressly commits to do or say something for the brand:*

In the event this involves a communication in writing by the influencer, such as an internet post, the influencer should:

- expressly identify the post as being a paid advertising (e.g. for Instagram or Twitter, such identification can consist in a #ad, #advertising or #sponsored as first hashtag or somewhere viewable at all times in connection with the post (i.e., not in a section of the post that requires expanding to read); for YouTube, such identification can consist in a #ad, #advertising or #sponsored in the video itself (embedded) or by oral statement in the video but not in the video description;
- comply with the MH Code for Responsible Communication & Marketing;
- include a responsible drinking message in the post or communication piece (such as #drinkresponsibly).  
It is strongly recommended to formalize such a collaboration via a written agreement listing the influencer's obligations.

### The post must also:

- be made on MH approved social media;
- be approved by the MH entity before public release if possible in practice. If not possible (e.g. live stories), the MH entity must give clear guidelines to the influencer.

It is strongly recommended to formalize such a collaboration via a written agreement listing the influencer's obligations.

*(ii) Influencer receives something (such as product, invitation to an event, discount...) BUT doesn't expressly commit to do or say something for the brand:*

In this situation, when possible, the MH entity should encourage the influencer to be transparent about the relationship. This may be achieved by sending a note to the influencer:

- Influencer should disclose the nature of its relationship with the MH entity/brand (e.g. if an influencer received a bottle: "thank you XX for having given me a bottle"). Alternatively, the influencer should add a hashtag such as #ad, #advertising or #sponsored as first hashtag or somewhere viewable at all times in connection with the post (i.e., not in a section of the post that requires expanding to read).
- MH entity does not need to approve the post before public release

*(iii) Influencer doesn't receive anything (such as money, product, invitation to an event, discount...) AND doesn't expressly commit to do or say something for the brand:*

In the absence of commercial/business relationships between influencer and MH entity, there is no specific condition, but MH entity must not approve any communication.

# Annex III: Marketing Partnerships

Moët Hennessy believes that companies have a role to play to improve Society and protect the planet. Our Maisons can enter into marketing partnerships in the areas of e.g. sustainability, equality, development, training, music, cooking, hospitality, pictorial art, etc. That said, MH being in alcoholic beverages, associating our Maisons and some highly sensitive environments is not allowed. The areas where MH should not enter into partnerships for marketing purposes include:

- Underage people
- Health (including cancer and mental health)
- Alcohol addiction-related environments

Moët Hennessy believes any association of our brands with motor sports must be managed carefully. Marketing communications should only depict drinking alcohol beverages after an event involving motor vehicles.

For partnerships signed prior to 2021, the below safeguards must be considered:

- Seek to distance the Maison and its products from the issue of underage people, health (including cancer and mental health), drink & drive and alcohol addiction-related environments.

Be wary of not giving the impression that the Maison is ambiguous vis-a-vis underage people, health (including cancer and mental health), driving, and alcohol addiction-related environments

## Note

The above provisions do not apply to CSR programmes, which objectives are specifically aimed at addressing a societal issue (e.g. supporting drink and drive prevention programmes). Such CSR programmes must be developed with the input of Public Affairs and Sustainable Development.

As a condition of doing business with an entity within the LVMH Group, the below Supplier certifies that Supplier will comply with this Code and its requirements.

Executed as of this ..... (Day) of ..... (month), ..... (year)

Supplier Name: .....

Supplier Address: .....

Supplier Representative Name and Position: .....

Supplier Representative Signature: .....

.....