

Responsible Marketing Policy

SAMWORTH
BROTHERS

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Introduction

At Samworth Brothers, our purpose is to be a long-term force for good and “Do good things with Great Food.”

We believe that marketing and advertising play an important role in informing people about the benefits of our products and innovations. They allow us to engage consumers on issues that matter to them. But we also believe that our communication and marketing activity should be conducted in a responsible way and provide relevant information on the nutrition of our products.

We have therefore launched our Responsible Marketing policy which applies to all brands within the Samworth Brothers Group.

The primary scope of this policy is the brands that Samworth Brothers own. However, we also work with our private label customers to support them in their own responsible marketing practices. For example, via regular surveillance of the nutritional's on our products to ensure they match the labelling on products.

We also have a Health & Nutrition Strategy to guide the future of our product development across both our branded and private label business. More detail on this can be found in the report in the Health and Nutrition chapter.

General Marketing Principles

- It is our policy to avoid messages that could encourage overconsumption of any of our products or the pursuit of unhealthy lifestyles.
- We commit to presenting products in a context of a balanced diet and with appropriate portion sizes.
- We aim to promote healthy lifestyles, positive body image and embrace diversity in our advertising.

Truthful and Legal

- We adhere to all relevant laws and regulations for the countries in which we operate. In the event there are conflicts between this policy and any law or regulation we apply the strictest criteria.
- We commit to ensuring our marketing communications are legal, decent, honest, and truthful, with claims having a sound scientific basis.
- All communications in paid-for media must be approved by the relevant bodies for each media (for example Clearcast for linear and video-on-demand TV).
- We also follow the advice of the Institute of Practitioners of Advertising (IPA) and Institute of Promotional Marketing (IPM) to ensure our communication is responsible.
- All commercial communications which include health, nutrition, environmental or ethical claims must be validated, and we require marketing colleagues to have read and understood the latest guidance and principles (including from the Competitions and Markets Authority) before making any claims.

Data Privacy

- Samworth Brothers takes responsibility to look after its data seriously. Our privacy policy sets out how and why we collect data, as well as how we use and protect it.
- We have in place policies and procedures in place to make sure that only authorised people can access the information, that information is handled and stored in a secure and sensible manner and that all systems that can access the information have the necessary security measures in place. In addition to these operational measures, we also use a range of technologies and security systems to reinforce the policies.

Marketing to Children

- We do not market any of our products to children under the age of 16 unless both the advertised product, and >90% of the advertised brand range are classified as “non-HFSS” under the UK’s Nutrient Profile Model system.
- This pledge refers to paid and unpaid communications developed by Samworth Brothers with the intention of promoting its products across all print media (newspapers, magazine books and printed advertising in public places), all broadcast media (traditional TV, radio), all non-broadcast electronic and/ or digital media (its own and third-party websites, social media, mobile and SMS marketing, native online marketing, games and apps, CDs/ DVDs), all of in-store or point-of-sales marketing, including packaging. Sponsorship (e.g. sporting, entertainment or cultural events or activities). All additional forms of marketing (cinema, outdoor, product placement in movies, TV shows, etc.). Marketing communications are considered to be addressed to children under the age of 16 when these represent at least 30% of the audience.
- It excludes marketing communication developed by third parties (e.g. our retailers) which may feature our brand but over which we have no control. Our media targeting is regularly monitored by our media agency and the third party media owners.
- We do not engage in advertising directed at students in primary schools. This restriction does not apply to menus and signage at the point of sale identifying those products available for purchase, charitable donations or fundraising activities, public service messages, and items provided to school administrators for education purposes or for their personal use.

Sampling and Activation

- We will only conduct sampling activities in school environments where products are a) non-HFSS and b) meet the School Meals Food Standards (School food standards practical guide - GOV.UK (www.gov.uk)) Otherwise, we do not conduct sampling activities targeted at children under the age of 16.
- We consider sampling activities to be addressed to children under the age of 16 when these represent at least 30% of the audience.
- This policy excludes charitable donations of product and redistribution of surplus food to those suffering from food insecurity.
- Any activation promotions (e.g. on-pack competitions) will have a minimum entry age of 18.

Distribution In Specialist Channels

- In specialist channels, we work with our customers to ensure our ranges meet the relevant nutritional criteria. For example for Healthcare, we are working with our customers to develop planograms and ranges that will deliver against the Government Buying Standards guidance on nutritional profile.
- We also distribute a number of our food-to-go and Soreen products in both primary and secondary schools. In these environments we work closely with our retail customers to ensure we comply with all relevant food standards / nutrition criteria.
- We do not engage in product advertising directed to students in primary schools. This restriction does not apply to menus and signage at the point of sale identifying those products available for purchase, charitable donations or fundraising activities, public service messages, and items provided to school administrators for education purposes or for their personal use.

Labelling - Nutritional

- We are compliant with all legal obligations.
- We commit to provide Nutritional Information to consumers such as detailed nutritionals on the back of each product.
- All our packaged products will provide a contact for the consumer to get further, detailed product and nutritional information (website, call centre).
- Where a product is sold without pre-prepared packaging and/or is sold in a served-over environment, basic nutritionals will be displayed on the shelf-edge label and a QR code can be scanned to show detailed nutritionals.

Labelling - Recycling

- Much of our packaging already carries OPRL recycling guidelines.
- We aim to introduce this information on all packaging within the next 12 months to inform consumers about how they can dispose of it responsibly.

New Product Development (NPD)

- We aim to improve the nutritional profile of our product portfolio over time, while still offering consumers breadth of choice and fantastic quality food.
- We have developed a strategic Health and Nutrition Plan for all Samworth Brothers categories and brands, within which we have set targets for the improvement of our average score on the Department of Health's Nutrient Profile Model (based on sales weighted average).

- We have a cross-functional, cross-category team in place that leads the delivery of this strategy. Performance against the target is tracked on a quarterly basis, and is part of the objectives set for all our leadership team, right up to our Executive Board.

Monitoring

- We annually monitor and report our compliance with this policy.
- In the event of any non-compliance, we work with our marketing teams to address incidences of noncompliance and implement the appropriate corrective action to prevent future issues.

ISSUED BY: **GROUP RESPONSIBLE BUSINESS**
ISSUED ON: **7/9/2023**
VERSION: **2.0**
APPROVED BY: **RESPONSIBLE BUSINESS STEERING COMMITTEE**