

The CODE

THE LION NATHAN NATIONAL FOODS
CODE FOR RESPONSIBLE MARKETPLACE ACTIVITY



LION NATHAN
NATIONAL FOODS





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Introduction to the Code for Responsible Marketplace Activity

The role of our Code

The Lion Nathan National Foods Code for Responsible Marketplace Activity (the Code) sets out our commitment to marketplace practices across our primary business units – Lion Nathan and National Foods – that do not in any way contribute to the problems of alcohol misuse, obesity, or excessive consumption in general.

Consistent with our value of Acting with Integrity we seek to achieve best practice in self-regulation, supporting a thorough system of marketing and communications controls. This is where the Code comes in. It acts as a guide to our people and establishes standards that ensure a consistent approach to responsible marketplace activity.

Competitive marketing is a crucial component of a vibrant commercial market and we are proud of the role our marketing plays in bringing new and exciting products and categories to consumers. For instance, within Lion Nathan

our first rate marketing campaign for Hahn Premium Light led to the development and maintenance of the premium light beer market; whilst marketing continues to allow National Foods to introduce innovative new products that can benefit wellbeing – such as Pura HeartActive™ and Pura Kids with omega-3 DHA.

The aim of our marketing is to create the best-loved brands in each market we operate in by encouraging consumers to choose from our fantastic brand portfolio. In doing this, the Code helps us to mitigate any unintended consequences from this activity.

The scope of our Code

The Code is consistent with all voluntary self-regulatory codes we are signatory to in the markets in which we operate. These codes should be respected in addition to the criteria set out in this LNNF standard and are outlined below, per business unit.



Lion Nathan National Foods

The below codes are adhered to across all LNNF business units in Australia:

- The Australian Association of National Advertisers (AANA) Code of Ethics;
- The AANA Food and Beverages Advertising and Marketing Communications Code;
- The AANA Environmental Claims in Advertising and Marketing Code;
- The Free TV Commercial Television Industry (CTI) Code of Practice;
- The ASTRA Codes of Practice for Subscription TV;
- The Commercial Radio Codes of Practice;
- The Packaging Covenant;
- Accepted labelling protocols established in Australia.

Furthermore, our agency marketing partners are bound by the terms of the Advertising Federation of Australia (AFA) Agency Code of Ethics.

All television advertising is also subject to review by Free TV Australia, which ensures all advertisers' commercials comply with the AANA Code of Ethics.

Lion Nathan Australia

In addition to the aforementioned codes, Lion Nathan Australia adheres to the below code, which is business unit specific:

- The Alcohol Beverages Advertising Code (ABAC).

In addition:

- Section Six of the CTI Code of Practice sets out placement restrictions on certain types of television advertisements that are recognised as sensitive. Alcohol is included within that section;
- All radio advertising for alcohol is subject to review via the Commercial Radio Codes of Practice, which is monitored by the Federation of Australian Radio Broadcasters (FARB).

National Foods

In addition to the aforementioned codes, National Foods adheres to the below codes, which are business unit specific:

- The AANA Code for Advertising and Marketing Communications to Children;
- The Australian Food and Grocery Council's Responsible Children's Marketing Initiative;
- The National Food Authority Code of Practice on Nutrient Claims in Food Labels and in Advertisements (note: this will be replaced by the AFGC Code of Practice for Food Labelling and Promotion in early 2011);



- The AFGC Daily Intake Guide Labelling Scheme.

Lion Nathan New Zealand

In New Zealand, Lion Nathan adheres to all relevant local codes, including:

- The Advertising Standards Authority (ASA) Advertising Codes of Practice;
- The ASA Code for the Naming, Labelling, Packaging and Promotion of Liquor;
- The Liquor Advertising Pre-vetting System (LAPS) administered by the Association of New Zealand Advertisers;
- The Liquor Promotion Pre-vetting (LPPS) and Delegated Authority approval systems administered by the Association of New Zealand Advertisers;
- The New Zealand Packaging Accord.

The application of our Code

Compliance with both the letter and spirit of the Code is mandatory for all our people. That spirit is to ensure that all LNNF marketplace activity is responsible; in line with community standards and expectations; and entirely consistent with the aims of not contributing to the problems of alcohol misuse, obesity or excessive consumption in general.

It applies to all forms of brand marketing and commercial communications, except where this document specifically exempts a type of communication. Disciplines covered include:

- Advertising;
- Internet advertising;
- All other website content;
- Social media;
- Word of mouth activity;
- Brand naming, packaging and labelling;
- Sponsorship;
- Producer point of sale materials;
- Merchandising;
- Consumer and trade PR;
- Consumer and trade promotions;
- Brand events;
- NPDP / product reformulation and insight generation;
- Product sampling (in-store or at an event).

The Code does not apply to the following:

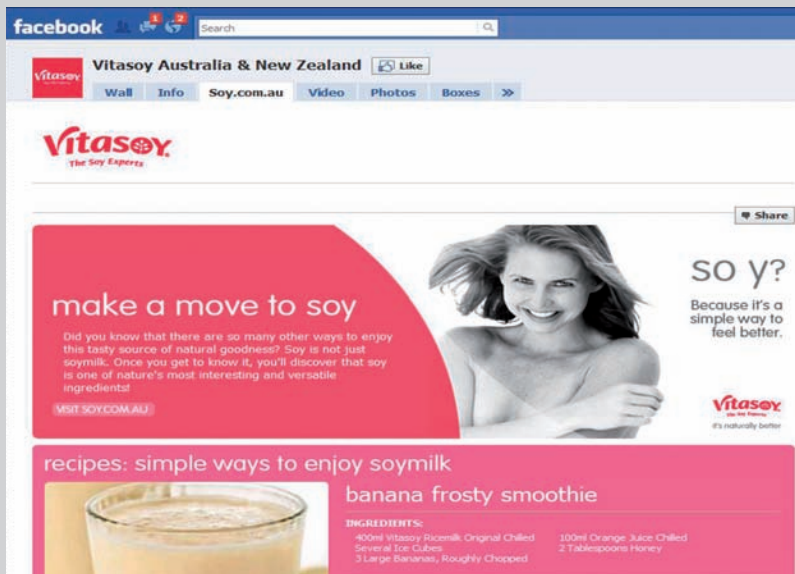
- Corporate communications;
- LNNF, LN or NF contributions to relevant public debates;
- The use of branded materials as part of a responsible use and alcohol education activity or nutritional awareness or educational activity;
- Materials used as part of a manufacturing site or tourist attraction (for example, a brewery tour or cheese shop).

The Code applies to the reasonably foreseeable impact on a reasonable person within the class of people to whom the communication is directed and other persons to whom the communication may be communicated – taking into account the content or approach as a whole.

In practice, this means very unlikely interpretations of our activities by unreasonable people should not concern us. We are looking for the impact that our activity would have on reasonable people within the group of people who are likely to see or be involved in the activity.

LNNF cannot be held responsible for the activities of third parties where we have no control once our product is provided. However, if we are seeking a branding or marketing outcome from the provision of product, this constitutes marketplace activity for the purposes of our Code.

If we believe one of our brands is being used in association with inappropriate marketing activity, we will use reasonable endeavours to ensure it does not continue.





Our sociability and wellbeing commitment



At LNNF our core purpose is bringing more sociability and wellbeing to our world. Our combined portfolio of household-name brands add to life's sociable moments – whether that is mealtime with the family or drinks at the local pub with friends – and in the vast majority of cases provide great enjoyment to those who consume them.

The misuse of our products undermines sociability and wellbeing and is therefore fundamentally at odds with our reason for being. We want our products to be consumed responsibly, both because it is right and because it will ensure the sustainability of our business for many years into the future.

As such, the Code has been developed with a recognition of the positive role strong brands can play in helping consumers make educated choices about food and beverage products. We believe that in promoting positive images of responsible drinking and responsible food and beverage consumption in our marketing and communications activity, we can make a positive contribution to the communities in which we operate.

Our commitment to sociability and wellbeing permeates the way we do business, from insight generation and product design to marketing communications and sales, right through to point of purchase.

Reinforcing positive images of people who are drink aware and drink responsibly

At Lion Nathan, the aim of our marketing is to help confirmed drinkers make educated brand choices about the alcoholic beverage products they consume. Better brands alert drinkers to the availability of a wider variety of products, they add to the enjoyment of the product experience and they bring with them a guarantee of quality and consistency.

We believe that in promoting positive images of responsible drinking in our marketing and communications activity, we can form part of the ongoing campaign to promote a responsible drinking culture in the markets in which we operate. This means we will only depict positive images of people enjoying our products responsibly and will never, in any of our marketplace activity, encourage the misuse of our products or specifically target groups that are particularly at risk of harm as a consequence of consuming alcohol. At the same time, we will respect the decisions of those people who choose not to drink and as such we will not present abstinence in a negative light.

In New Zealand we support the Alcohol Liquor Advisory Council (ALAC) Guidelines for safe and responsible consumption and we will depict drinking patterns that are consistent with these Guidelines. In Australia, we refer to the National Health and Medical Research Council (NHMRC) Guidelines. While the community, including health experts, has raised serious questions about the new NHMRC Guidelines (2009), for the sake of consistency with the industry pre-vetting system we will depict consumption in line with those standards.

Lion Nathan recognises that its joint-venture brand partners, such as Heineken Lion and Bacardi Lion in Australia and Diageo and others in New Zealand, have their own world class responsible marketing codes and communications controls in place. Given our joint-venture brand partners are responsible for the product design and marketing of their brands, in these instances their codes will take the lead to avoid duplication.

See 'Helping People BeDrinkAware and Drink Responsibly' on page 12 for further information.

Reinforcing positive images of people who understand wellbeing

At National Foods we aim to help consumers make educated brand choices about the food and beverage products they consume.

We are committed to providing nutritious foods to adults, children and adolescents that can assist these groups in meeting nutritional requirements and making healthy food choices. When consumed as part of a healthy, balanced diet, our stable of iconic brands in the dairy, juice and soy categories can benefit wellbeing. For example, we produce a wide range of dairy foods – and dairy foods are the richest source of calcium in the Australian diet.

As part of this commitment we will ensure our marketing activity portrays responsible consumption patterns that reinforce a healthy, balanced diet and active lifestyle. Additionally, we will not advertise food and beverage products to children under 12 unless those products represent healthy dietary choices, consistent with established scientific or Australian government standards.

We support the NHMRC's Dietary Guidelines for Australian Adults and Dietary Guidelines for Children and Adolescents in Australia, The Department of Health and Ageing's Australian Guide to Healthy Eating and state-based school canteen nutrition policies.

See 'Helping People Understand Wellbeing' on page 14 for further information.



General principles

The following principles apply to all Lion Nathan National Foods marketplace activity – across both Lion Nathan and National Foods.

Ethical and socially responsible

Our marketplace activity will be legal, ethical, decent and truthful, and should not offend or impugn human dignity.

All forms of marketplace activity involving LNNF brands will be socially responsible and in line with community standards.

We will not depict or encourage images or practices that are likely to result in reasonable people placing themselves in undue danger, or that are likely to have an adverse health impact.

We will not depict images or practices that are likely to encourage behaviour that would be detrimental to animals or the environment.

Anti-social behaviour

We will not associate the consumption of any of our products with violent, aggressive, dangerous or antisocial behaviour (crowd or public disorder). Consistent with this, we will not profile illegal drugs or drug culture.

Product nutritional information and claims

All forms of advertising for alcoholic beverages, non-alcoholic beverages and food products are regulated by the Australian and New Zealand Food Standards Code, as well as the Code of Practice on Nutrient Claims in Food Labels and in Advertisements. If a claim is not permitted on a label, it cannot be used in any branded communications. There are also criteria for the use of 'diet' as a claim on a product and a food/beverage can make a weight maintenance claim, but not a weight loss claim.

Furthermore, we are prohibited from saying many things about a beer brand – including health claims, the presence of vitamins and nutritional ingredient claims.

Interactivity

In line with our commitment to responsible marketing, online forums set up to interact and engage with consumers will encourage and promote mature and responsible conversation. We will monitor interactive areas on a regular basis to ensure user generated content is in line with the letter and spirit of this Code.

Where we manage social networking sites, sponsor online channels or employ parts of our brand websites to encourage users to interact by entering feedback, information, videos, or other items for display, we will follow the below guidelines:

- **Text:** where users are able to enter text for display online, an automated screening process will vet wording prior to display. This screening process will vet offensive language, words associated with the misuse of alcohol, and other words as necessary or relevant. This content will also be moderated twice daily by LNNF or partner agencies.
- **Images, sound, video and interactive games:** where users are able to upload multimedia items we will pre-vet content where logistically possible, and where it is not, moderate the content twice daily as outlined above.

Whilst it is not always possible for these sites to be monitored over weekends, pre- or post-vetting will take place first thing Monday to screen all weekend content.

Where we work with a third party to provide an interactive environment for our consumers (e.g. Facebook, YouTube, myspace), our preference will be given to companies who allow us the levels of moderation outlined above.

We will also publish the steps we are taking to moderate user content on our brand websites.

For Lion Nathan, when choosing an online channel we will ensure it is made up of 75 per cent local users aged 18+. Where possible, we will incorporate 18+ screening pages, disclaimers or tick boxes to ensure branded content communicates to legitimate drinking audiences.

Word of mouth

Where we engage in word of mouth marketing, we will always be open and make a declaration as to the brands we are promoting.

Where we pay or give incentives to third parties to talk about our brands on our behalf, they should declare their connection with Lion Nathan, National Foods, or a particular brand (where the consumer would reasonably expect them to do so). We will not engage in marketing

practices that could be deemed covert or deceptive.

In relation to mystery shoppers, this function acts as a test and reward process for our customers, and is not considered a marketing activity for the purposes of this Code.

Product placement

From time to time our products are depicted in television or film productions. We strongly encourage producers to seek company approval before using our products, signage or other props in artistic productions. Every now and then, despite our best efforts, we find our products and brands depicted in programmes and films without our approval.

When we have influence in terms of how our brands or product categories are depicted within a TV programme or film, we will apply the following principles:

- The need to protect the integrity of our brands and our brand equity;
- The need to ensure the portrayal of our brands within such communications cannot contribute to the problems of alcohol misuse, obesity, or excessive consumption in general;
- In general, alcohol misuse, obesity, or excessive consumption is not to be depicted in association with our products.

Clearly there are a great many cases where we do not have any control over the actions of television and film producers and LNNF cannot be held responsible for their output in these instances.

Sponsorship and promotion of our products at events

In keeping with our core purpose of bringing more sociability and wellbeing to our world, LNNF business units sponsor a range of community events including sporting, agricultural, entertainment and the arts and charitable events. We are proud of the significant contribution we make to the maintenance of vibrant and exciting Australian and New Zealand societies through these diverse associations.

In association with our support we have the right to promote our products at events together with the right to promote our association with events and event participation. Combined with these rights, we fully acknowledge our responsibilities and accordingly we do not seek to promote our products at events, or in association with events, which are designed specifically to target at risk or underage groups identified within this Code.

Additionally, we will use reasonable endeavours to ensure that all promotional advertising in support of these events, or materials distributed at these events, are in line

with this document and do not encourage inconsistent consumption patterns.

Specifically:

Lion Nathan

We will use reasonable endeavours to ensure that:

- Alcohol beverages at such events are served in keeping with guidelines, and where applicable legal requirements for the responsible service of alcohol (which preclude the serving of alcohol to underage persons);
- When using promotional staff or brand ambassadors in a licensed environment, we will ensure they are 18+ (25+ in New Zealand);
- Promotional staff at events sponsored by an alcoholic beverage brand do not promote consumption patterns that are inconsistent with responsible consumption, as defined by this Code;
- Promotional staff at events sponsored by an alcoholic beverage brand do not misstate the nature or alcohol content of a product.

National Foods

National Foods will, from time to time, provide samples of fresh milk, dairy and juice products and/or prepared foods/beverages (e.g. smoothies, cheese toasties) direct to the public at sponsorship events or in the context of other marketing activities.

In these situations we will meet all regulatory requirements relating to food storage and handling in order to ensure the health and safety of consumers.

Food handlers must take all reasonable measures not to handle food or surfaces likely to come into contact with food in a way that is likely to compromise the safety and suitability of food.

Food handlers are provided with documentation outlining their responsibilities to prevent the contamination of food and food surfaces and to minimise the growth of bacteria. The documentation includes:

- Cleaning and Sanitising Program Guide
- Hygiene Checklist
- Goods Receiving Form
- Cold Storage Temperature Log

Third Parties: At many events LNNF business units will be involved in some promotional activities, but not all (e.g. alcohol service but not food handling or vice versa). This protocol only applies to those activities or materials associated with LNNF business units. LNNF will use reasonable endeavours to ensure that where other parties control and/or undertake events, including activities surrounding these events, they comply with this protocol.

Helping people BeDrinkAware and Drink Responsibly



The following principles apply to Lion Nathan only.

Responsible consumption

At Lion Nathan we will utilise our marketing activity to help confirmed drinkers with their brand choices. We will at all times promote the responsible enjoyment of our products.

Responsible drinking labelling

At Lion Nathan we believe it is important to encourage the responsible enjoyment of our products by providing consumers with information on safe and responsible drinking. To do this, we currently utilise the www.BeDrinkAware.com.au logo on all marketing and communications materials in Australia and the www.drinkresponsibly.co.nz logo in New Zealand. These logos direct consumers to accompanying websites, where more detailed information is available.

In addition, our labelling will clearly state the information below to ensure consumers have the information they need to make responsible choices:

- The number of standard drinks in each bottle or can by virtue of a standard drinks logo;
- The alcohol by volume (ABV – the total liquid volume contained in each bottle or can);
- The best before date.

Standards for the depiction and promotion of responsible drinking

In Australia the NHMRC Guidelines were amended in 2009. Whilst it is Lion Nathan Australia's position that the science behind the previous NHMRC Guidelines was more robust, for the sake of consistency with the industry pre-vetting system we will ensure our marketplace activities depict, promote and are consistent with these standards. The Guidelines state that:

- Healthy males or females (with no special circumstances and of average height and build) who

choose to drink should consume two standard drinks or less on any day and no more than four standard drinks on a single occasion.

In New Zealand our marketplace activities should depict, promote and be consistent with consumption standards outlined in the ALAC guidelines. The Guidelines state that:

- Healthy males (with no special circumstances and of average height and build) should drink no more than six standard drinks in any one day and no more than 21 standard drinks in any one week.
- Healthy females (with no special circumstances and of average height and build) should drink no more than four standard drinks in any one day and no more than 14 standard drinks in any one week.

In both countries, when depicting drinking we will:

- Show people drinking at a sensible pace;
- Make it clear that an appropriate period of time has elapsed between drinks if a person is shown to have more than one drink;
- Not depict behaviour that could reasonably be interpreted as suggesting intoxication;
- Not show images of peers applying pressure to others to drink more than they would otherwise intend to drink;
- Not challenge or dare people to sample a product, particularly in a manner that would suggest the product has an illicit or dangerous quality to it.

Underage

Lion Nathan does not target people under the legal drinking / purchasing age with any of our marketplace activity.

As such, none of our marketplace materials and approaches will have a primary appeal to those under the age of 18 or encourage underage drinking.

All our brand-related websites will request confirmation of appropriate age on the homepage.

Effect of alcohol use on performance

We will not suggest that people featured in our marketplace materials have consumed alcohol prior to or during any activity that it would be dangerous to drink before or during.

In particular, we will not portray, encourage, or condone drink driving.

At no stage will we suggest that the consumption of alcohol enhances physical or mental performance.

Alcoholic beverages and success

We will depict the enjoyment of our alcohol products within the natural environments they are enjoyed safely and healthily, week in, week out across Australia and New Zealand.

People enjoy a beer or a glass of wine when socialising together, when celebrating successful outcomes, or when out on a date together, and it is only appropriate that we should reference those situations from time to time in our marketing and commercial communications.

We will not suggest that the consumption of any of our products is the cause of people enjoying themselves or has either directly or indirectly lead to successes, in particular financial, social or sexual successes.

Medical and therapeutic qualities

An increasing body of scientific evidence demonstrates that the moderate consumption of alcohol can provide wellbeing benefits (e.g. for the heart and Type II Diabetes).¹ The majority of this scientific evidence is based on moderate alcohol consumption regardless of source.

On company and industry websites that are not linked to specific products we will promote the benefits of moderate consumption and discuss the consequences of excessive consumption.

However, in promoting our brands, we will not claim or suggest that consuming a specific product will confer health benefits or therapeutic outcomes. Our marketplace branded materials or activities will make no health claims. We will not promote our beer brands in a way that may imply they can prevent or cure medical conditions. We will not suggest that our products are a necessary aid to relaxation.

This should not preclude references to the relative benefits of light and mid-strength products handled appropriately.

Alcoholic beverages and strength

We will not place undue emphasis on relatively high alcohol content as the principal basis of appeal of a product to the consumer.

Giving clear, factual information about the alcoholic strength of a drink may help consumers make informed decisions, however strength should never be the dominant theme of any marketing and commercial communications materials, unless in relation to reduced strength (light or mid-strength) products.

We will not reference alcohol content as a reason to prefer a product except in a fashion consistent with responsible practices and specifically in the context of reduced strength beer.



1. R Doll et al, Mortality in Relation to Consumption of Alcohol: 13 Years' Observations on Male British Doctors BMJ 1994, 309:911-918; L A Simons et al Moderate Alcohol Intake is Associated with Survival in the Elderly; the Dubbo Study MJA 2000, 173: 121-124; AIHW Statistics on Drug Use in Australia 2006 p.35; Rimm EB et al, A Biologic Basis for Moderate Alcohol Consumption and Lower Coronary Heart Disease Risk: A Meta-Analysis of Effects on Lipids and Haemostatic Factors, BMJ, 319: 1523-1528, 1999; Hines LM et al, Moderate Alcohol Consumption and Coronary Heart Disease: A Review, Postgrad Med J, 77:747-752, 2001.

Helping people understand wellbeing



The following principles apply to National Foods only.

Responsible consumption

At National Foods we will only promote the responsible consumption of our products and will further aid consumer decision making through the provision of relevant product information.

Labelling

To ensure consumers have the information they need to make informed nutrition choices, our labelling is compliant with the Australian and New Zealand Food Standards Code and the Code of Practice on Nutrient Claims in Food Labels and in Advertisements.

Standards for the depiction and promotion of responsible consumption

National Foods will ensure all communications are consistent with the standards for the depiction and promotion of responsible consumption, as outlined by the AANA Food and Beverage Code:

- We will not undermine the importance of healthy or active lifestyles or the promotion of healthy balanced diets through our communications;
- We will not encourage what would reasonably be considered as excess consumption of our products or display portion sizes disproportionate to the setting portrayed;
- All nutrition related claims and information will be supported by scientific evidence, meeting the requirements of the Australia New Zealand Food Standards Code and the Code of Practice on Nutrient Claims in Food Labels and in Advertisements;
- Any nutrition comparisons will not be misleading or deceptive, and will be presented in a manner understandable by an average consumer;
- Any reference to consumer taste or preference tests will be statistically viable or otherwise not used;
- We will not use scientific terms to falsely ascribe

validity to advertising claims;

- Any claims relating to material characteristics such as taste, size, content, and nutrition related benefits will be specific to the product represented in the communications;
- We will not portray products that are not intended or suitable as substitutes for meals as such.

Additionally:

- We will not advertise food and beverage products to children under 12 unless those products represent healthy dietary choices, consistent with established scientific or Australian government standards (see 'Marketing to Children' on the following page for further guidance).



Marketing to children

National Foods is committed to reflecting community values and meeting expectations in terms of how our products are marketed. In doing so, we help promote healthy dietary choices and lifestyles to children. This commitment is spelt out in our Company Action Plan, which forms part of the Australian Food and Grocery Council's Responsible Childrens Marketing Initiative (RCMI) and is summarised below in guidance notes.

- Will not advertise food and beverage products to children under 12 in media unless:
 1. Those products represent healthy dietary choices, consistent with established scientific or Australian government standards as outlined below;
 2. The advertising and / or marketing communication activities reference, or are in the context of, a healthy lifestyle, designed to appeal to the intended audience through messaging that encourages:
 - Good dietary habits, consistent with established scientific or government criteria;
 - Physical activity.

We support the following Australian government standards: NHMRC's Dietary Guidelines for Australian Adults and Dietary Guidelines for Children and Adolescents in Australia, The Department of Health and Ageing's Australian Guide to Healthy Eating and state-based school canteen nutrition policies.

Use of popular personalities and licensed characters

- National Foods will not use popular personalities or licensed characters in advertising primarily directed to children under 12 unless such advertising complies with the messaging options set out in 1 and 2 above and the specific requirements of the Children's Television Standards in relation to promotions and endorsement by program characters (CTS section 22).

Product placement

- National Foods will not pay for or actively seek to place its food or beverage products in the program / editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products, unless those products are consistent with healthy dietary choices under 1 above.

Use of products in interactive games

- National Foods commits that, in any interactive game primarily directed to children under 12 where the company's food or beverage products are incorporated into the game, the interactive game must incorporate or be consistent with healthy dietary choices under 1 above and healthy lifestyle messaging under 2 above.



Advertising in schools

- National Foods believes in the importance of communicating the value of a balanced and nutritious diet that includes dairy and juice for children. We will only undertake product-related communications in primary schools, where specifically requested by, or agreed with, the school administration for educational or informational purposes, or related to healthy lifestyle activities under the supervision of the school administration or appropriate adults.

Use of premium offers

- National Foods' advertising of premium offers will be consistent with 1 and 2 under Advertising Messaging above and will comply with the AANA Codes and the Children's Television Standards (CTS Section 20).

Health and wellbeing qualities

Many of the food and beverage products produced by National Foods confer specific wellbeing benefits to consumers. Dairy products for example are the richest source of calcium in the Australian diet and can naturally provide a unique package of more than 10 essential nutrients – which are important for overall health and wellbeing.

On company and industry websites that are not linked to specific products we will responsibly promote the benefits of consumption of dairy foods, as well as soy and fruit juice.

In promoting our brands we will ensure adherence to the Australian and New Zealand Food Standards Code and the Code of Practice on Nutrient Claims in Food Labels and in Advertisements, in addition to previously mentioned Codes (page 5).

Guidelines

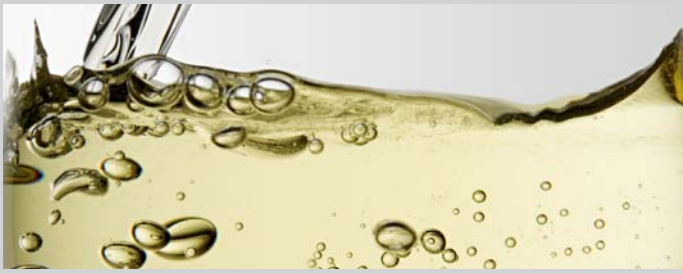
- For further information on nutrition related claims and relevant guidance, refer to the Food Standards Code and Standards 1.1.A.2, 1.2.8, 1.3.2, and the Code of Practice on Nutrient Claims in Food Labels and in Advertisements.



NATURALLY BREWED
BLACK MAC

MAC'S GOLD
ALL MALT LAGER

330ml 4.0% ALC/VOL
MAC'S GOLD
ALL MALT LAGER
MAC'S BEVERY NATURALLY BREWED



Compliance

This Code sets out a framework for all those involved in the marketing of our brands, including our marketing partners.

We require every member of our staff who is involved in the development or marketing of our products to be fully aware of their obligations under this Code and expect them to apply the spirit and letter of our policy in everything they do.

Equally, we require our external marketing partners to have full knowledge of their obligations and the same level of understanding as our own teams, and we provide annual training to assist in this process. Where appropriate, we intend to include this as a term in new contracts of engagement.

Nutrition related standards

The Australian and New Zealand Food Standards Code covers all forms of advertising labels, cartons, point of sale, TV and press releases and so on. There are other pieces of Legislation that packaging must comply with – for instance, Weights and Measures and Excise.

Disclaimer

This Policy applies to the employees and contractual partners of Lion Nathan National Foods and compliance with the Policy is mandatory for those employees and partners within the context of their contracts with Lion Nathan National Foods, Lion Nathan or National Foods. Any publication of this Policy by Lion Nathan National Foods will not be, or be deemed to be, a representation regarding compliance with the Policy and is not intended to provide any basis or grounds for complaint, claim or legal action by any third party. This Policy is not intended in any way to affect, replace or offer an alternative to the advertising complaint mechanisms offered by external agencies such as the ABAC Complaints Panel and the Advertising Standards Board.





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