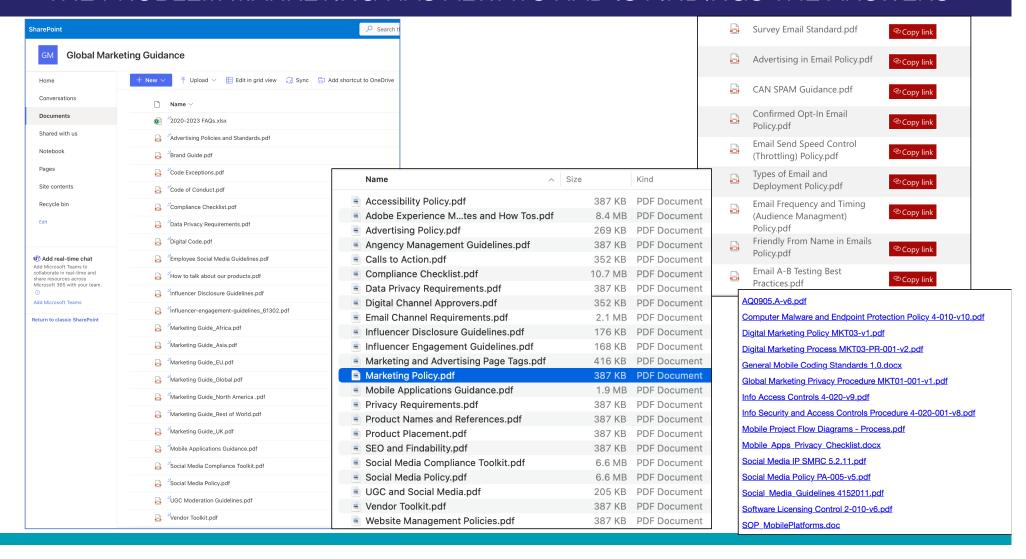


# Next level of enabling marketers

## THE PROBLEM MARKETING HAS ALWAYS HAD IS FINDINGS THE ANSWERS



# TOGETHER WITH COUNTERPARTS, HAVING TO ACTING LIKE SUPERHEROS

<u>Legal Compliance</u>. All users of official University social media accounts involving athletics shall comply with all NCAA regulations for social media account use and recruiting and shall abide by the policies and procedures for use that are established by any social media site or platform being used. All users, regardless of department, shall comply with all University policies and federal, state, and local laws, rules, and regulations, including but not limited to FERPA, when using and posting content to social media accounts.

- The Country General Manager or their delegate must approve all email copy to ensure compliance with laws regarding promotional email and local policies.
- ✓ Pre-approved global marketing email copy may be used without additional approval from your Country General Manager if you have Marketing Director approval. Preapproved copy must be reviewed and approved by Global Legal Counsel.
- ☑ It is your responsibility to sync opt-outs with partners and affiliates prior to sending out an email campaign. This is required to maintain email compliance with varying laws and regulations around the world.

### Base level marketer requirements

- The capturing and handling of customer data is compliant with all local privacy legislation
- The necessary safeguards are in place to ensure customer data cannot be accidently released, stolen or used for a purpose other than that defined on the website
- Internal policies are set for the capture and storage of customer data
- · Policies for handling customers' data are created and embedded
- Customer consent is obtained for using their contact information for marketing purposes
- Intellectual property is fully protected through copyright notices and trademarks
- Disclaimers are used where necessary
- The best practice approach for customer consent to the use of cookies is obtained and implemented
  - $\bullet \quad \text{Take legal advice whether this is necessary for your website based on your location} \\$
- Compliance with local legal requirements
- Compliance with all relevant industry codes of conduct
- Regularly review legal advice to ensure the website remains compliant at all times

# ALWAYS HAVING TO ASK "MAY I"

# GOVERNANCE

Compliance with the Code is mandatory. This is HEINEKEN's minimum standard policy for all external commercial communications. In localities where laws are stricter, they supersede our code.

Everyone involved in the marketing and sale of our brands including licensees and third-party distributors, is responsible for implementing the Code, including for the brands of our subsidiaries and joint ventures where we have a controlling interest. For joint ventures where we do not have a controlling interest, we educate them on the Code and encourage its adoption. To ensure effective compliance, the following actions are required:

- All Commerce, Corporate Affairs and Legal teams, marketing agencies and others involved in marketing and selling our brands, and all new hires shall complete annual training on this Code.
- All agreements related to commercial communication should refer to the Code and a copy of it should be attached to all contracts with parties that prepare, make or post commercial communications on our behalf.
- ★ Both Legal and Corporate Affairs should be involved as early as possible in any creative discussion about marketing or commercial communication to provide timely guidance, and should continue to be involved if new questions arise along the way.
- We take complaints about our commercial communications seriously. All complaints received from non-governmental organizations, consumers or regulatory bodies about a particular commercial communication, activity, or event, must be properly addressed and related correspondence stored and registered for audit purposes.

### **RESPONSIBILITY**

- ★ The Marketing Director is accountable for the training of the agencies they work with and for compliance with the Code within the full marketing team.
- The Sales Director is accountable for training the agencies with whom they work. They are responsible for ensuring Code compliance for all non-frontline sales and trade marketing employees that work on marketing, and with external agencies.
- ★ The Global Brand Directors are responsible for any marketing or sales activities agreed on a regional or global level – for instance an agreement with a regional supermarket chain or a sponsorship deal for a global event.

### **APPROVALS**

★ Any issues related to the sign-off process, additional guidance or potential departures from the Code should first go through Legal and Corporate Affairs and, if they believe it's required, will be escalated to Global. Written approval is then needed from the relevant Global Marketing Director before any activity gets underway. In case this does not resolve the dispute, the issue will be presented to the Chief Commercial Officer, Chief Corporate Affairs and General Counsel at Global for a final decision.

# IN 2019, WE STARTED TO THINK ABOUT FREEING POLICIES

2013-2016

Ebola epidemic

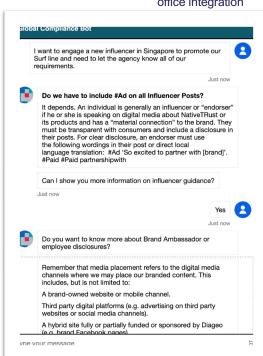
2019

Policy requirements delivered through a chatbot for faster content approval

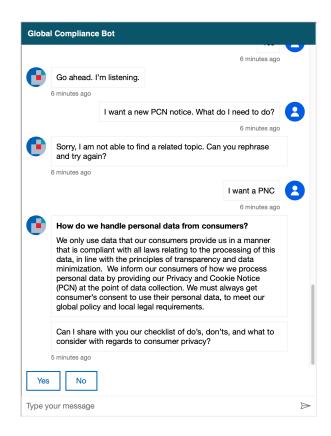


TODAY

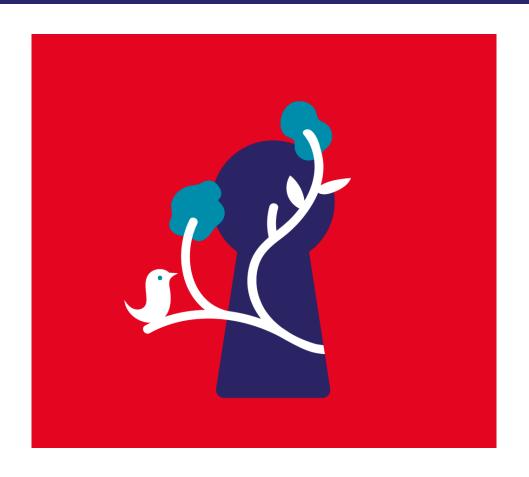
Personalized policy guidance with continual learning and back-end office integration



# LET'S TAKE A LOOK



# KEEP IN TOUCH



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