# PROMOTING A CULTURE OF RESPONSIBLE DRINKING: GRUPPO LUNELLI'S POLICY

## PREMISE: GRUPPO LUNELLI AND THE CULTURE OF RESPONSIBLE DRINKING

Gruppo Lunelli promotes exclusively informed consumption of alcoholic drinks, by adults who choose to drink in a responsible manner.

Conscious of the importance of correct consumption of alcoholic beverages, the Gruppo is committed to participate only in initiatives aimed at promoting a culture of responsible drinking.

The abuse of alcohol, and drinking in situations, conditions of health or at an age when it should be avoided, represents a risk for oneself, and also a potential danger for the safety of others. For this reason, the Gruppo is determined that its communications should be restrained and transparent, favouring the adoption of appropriate behaviour with regard to the consumption of alcoholic beverages.

Thanks to this Policy, the Gruppo aims to guarantee that its activities in the spheres of information, communication and marketing are always carried out in line with the culture of responsible drinking that is part of the Italian Art of Living: a culture linked to the rituals of food and the celebration of convivial occasions in which consumption is moderate and informed.

# GRUPPO LUNELLI'S POLICY ON RESPONSIBLE DRINKING: ITS OBJECTIVE

Gruppo Lunelli is committed to promoting its brands in a responsible manner among an adult audience.

The Gruppo's Policy on responsible drinking represents the company's commitment to guarantee its consumers the possibility to choose products that are of high quality and safe, as well as enjoying them in an informed manner.

For the Gruppo, promoting its brands means highlighting their excellence and uniqueness with a view to moderate consumption that is not harmful to people's health and wellbeing.

# GRUPPO LUNELLI'S POLICY ON RESPONSIBLE DRINKING: ITS FIELD OF APPLICATION

The Policy applies to all activities regarding the information, marketing, sales, advertising, and sponsorship of Gruppo Lunelli's alcohol-based products, independently of the channels used, including digital ones.

Compliance with the Policy is mandatory for the Gruppo's employees and collaborators. The Policy is communicated to employees and collaborators and to the agencies that develop marketing materials (advertising, promotions, sponsorships, events, labels and packaging for the products ...).

Also, it is visible on the Gruppo's digital public communications channels and in the areas of the winery devoted to hospitality, with the objective of sensitising a wide public to the culture of responsible drinking.

#### 1. Respecting the culture of responsible drinking

The activities of information, communication and marketing must always be carried out in line with the culture of responsible drinking that the Gruppo promotes.

These activities must not encourage irresponsible consumption of alcoholic beverages or suggest that excessive consumption is acceptable. It is forbidden to manifest any kind of appreciation for those who are excessive in their consumption of alcoholic drinks or people who are intoxicated under its influence, or suggest that such types of behaviour are appropriate.

They must not present moderation in - or abstinence from - drinking alcoholic beverages in a negative light. The Gruppo respects the choice of those who decide to abstain completely from alcohol, for example for cultural or religious reasons.

They must not suggest that social acceptability, success or popularity can be linked to the consumption of alcoholic beverages or that alcohol is conducive to lowering inhibitions, resolving problems, or improving one's mood.

## 2. The health and safety of consumers

The activities of information, communication and marketing must not try to conceal the effects associated with the consumption of alcohol and must be aimed exclusively at an adult audience.

They must never be addressed at people below the legal age for drinking alcoholic beverages, always respecting international and national laws.

They must not show minors in situations in which they are consuming alcoholic beverages; they must avoid being especially attractive to children and adolescents, and never suggest that the consumption of alcoholic beverages is necessary to become an adult.

They must never associate consumption with situations in which the effects of alcohol could cause harm for the consumer or for others.

The Gruppo is careful to increase awareness of the importance of adopting suitable behaviour with regard to alcoholic beverages in all those situations in which the consumption of alcohol - even if it is moderate – may nevertheless constitute a risk: when driving or riding any kind of vehicle, at work, when using machinery, or in particular stages of life such as pregnancy.

The Gruppo's brands must never be associated with dangerous, antisocial or illegal situations, or with people who are violent and aggressive.

They must never claim that alcohol can prevent or cure diseases or make reference to communication concerning health.

#### 3. Communication channels and tools

#### Digital communication

To limit the access of those below the legal drinking age to the Gruppo's websites in which alcoholic beverages are featured, there must always be a mechanism to confirm the age of visitors to the site or, alternatively, a disclaimer that states that the content is destined solely for users of above the legal drinking age.

Digital marketing platforms and communications must carry the message "drink responsibly".

User-generated content (UCG) must be monitored to ensure that it complies with the contents of the Gruppo's Policy.

The sending of digital marketing communications must be carried out respecting users' privacy and their consent must always be obtained, in compliance with the laws and regulations on the collection of users' data.

Consumers involved in market research must never be encouraged to drink in an excessive or irresponsible manner.

#### Promotions, sponsorships and events

Promotions and sponsorships must never put pressure on anyone to force them to drink, and they must not support activities that encourage excessive consumption.

They must not be addressed towards people who have not yet reached the legal drinking age.

No activities including "alcoholic games" which encourage speedy drinking, or which call for the consumption of inappropriate quantities of alcoholic beverages are permitted.

The Gruppo's brands of alcoholic drinks must not be associated with individuals or organisations involved in activities or behaviour that are in contrast with the culture of responsible drinking.

#### Information to the public

In the Companies' locations dedicated to hospitality or which are open to the public, the contents of this Policy and the principles to which the Gruppo adheres in order to promote a culture of responsible drinking will be made abundantly clear, thanks also to the raising of awareness on the part of the employees, the principal ambassadors for the Gruppo's commitment in this area.

## The policy in a nutshell

# PROMOTING A CULTURE OF RESPONSIBLE DRINKING: GRUPPO LUNELLI'S POLICY

Gruppo Lunelli promotes exclusively informed consumption of alcoholic drinks, by adults who choose to drink in a responsible manner.

It is committed to highlighting the excellence and uniqueness of its brands, guaranteeing consumers the possibility of choosing high-quality, safe products and encouraging moderate consumption that does not put people's health and wellbeing at risk.

Promoting a culture of responsible drinking is a concrete commitment towards our clients, employees and collaborators, and – in general – towards the whole of society, and young people in particular.

Gruppo Lunelli is determined that the communication of its brands should be transparent and correct and, aware of the importance of the appropriate consumption of alcoholic beverages, it only takes part in initiatives aimed at promoting a culture of responsible drinking, which is an integral part of the Italian Art of Living: a culture linked to the rituals of the food and the celebration of convivial occasions in which consumption is moderate and informed.