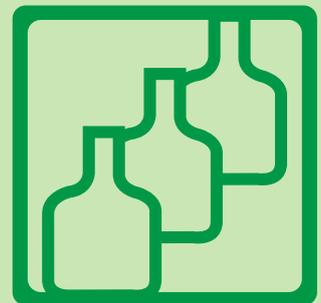


MANUAL OF BEST PRACTICES

Commercial Communication
of Alcoholic Beverages in
the Digital Universe

abrabe



associação
brasileira
de bebidas

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Guide on Good Practices in the Digital World

OPENNING LETTER

This material was designed to serve as a guide for the digital marketing initiatives of the Brazilian Beverage Association (ABRABE) and its members, and is available to anyone who wishes to use it as a reference. Hence, we are placing on record our reasons for producing it:

- Through initiatives such as this, we intend to strengthen the advertising self-regulation system in Brazil.
- In our view, this system in which advertisers, advertising agents and communication vehicles self-regulate their activities, brings benefits to consumers, authorities and competitors.
- Pursuant to the principles established in Article 37, Section 11 – Children and Youth, of the Brazilian Advertising Self-Regulation Code, which deals with the protection of children and adolescents, we understand the importance of protecting this group and therefore, of forbidding advertisements of alcoholic beverages targeted at individuals in these age groups.
- This material also aims to provide consumers with more transparency and protection.

It's for these reasons that this guide was conceived. The suggestions in it have the following purpose:

- To strengthen self-regulation of ethical standards applicable to commercial advertising, in force in Brazil since 1980.
- To extend these standards to digital communication, herein defined as communication carried out in any format, media or platform or applied to the digital world, including the Internet and mobile devices (mobile phones).
- The guiding principle of this guide is the recommendation that all communication actions in the digital world be directed at adults only.
- Its specific recommendations apply to all kinds and brands of alcoholic beverages, regardless of their grade. Note that the guidelines presented here are not aimed at social and educational campaigns promoted by alcoholic beverage brands. In such cases, the principles and standards established for this communication line apply.

Sincerely,

José Augusto Rodrigues da Silva

President of ABRABE



1. WHY A GOOD PRACTICES GUIDE?

The decline in traditional media audience due to the rise of digital media has been a dominating trend since the Internet became popular. More and more people are spending more and more time on their smartphones, tablets or computers. These days, even watches enable Internet access.

This hyperconnected world is both an opportunity and a challenge for all companies. Firstly since it represents a faster and more efficient way to reach the desired audience and secondly because it leaves in the hands of each the responsibility for filtering audiences and establishing a relationship based on ethics and common sense.

On the Internet, even local actions tend to become global. For instance, a piece initially made for the Brazilian market can be seen anywhere in the world – all it requires is a mobile device and Internet access.

In the case of alcoholic beverage marketing, specifically, it is necessary to implement and expand the ethical standards created over the last few decades, always adapting them, whenever necessary, to the new demands of this environment, which is more volatile and ethereal than traditional media.

This guide is an attempt to create this common standard that serves as a reference for communication for ABRABE and its members.

1.1. TO WHAT MEDIA DOES IT APPLY?

The provisions of this guide apply, but are not limited to:

- a) Applications,
- b) Blogs,
- c) Bluetooth,
- d) Any form of digital instant messaging (e.g. SMS, MMS, MSN, Snapchat, Whatsapp),
- e) Geolocation services,
- f) Microblogs (e.g. Twitter, Tumblr),
- g) Communication via mobile phone (WAP sites, ads in mobile devices),
- h) Online ads (e.g. Banners),
- i) Games (e.g. online apps, games for mobile phones),
- j) Information and/or opinion websites (e.g. Apontador, Yelp),
- k) Photo sharing services (e.g. Instagram, Flickr, Zoomr, Photobucket, SmugMug),
- l) Podcasts,
- m) Digital installations during events,
- n) Relationship marketing (e.g. email, campaigns such as “member get member”),
- o) RSS feeds,
- p) Search Optimization Engines,
- q) Social networks (e.g. Facebook, LinkedIn, MySpace),
- r) Video sharing (e.g. YouTube, Vimeo, Instagram),
- s) Wikis (e.g. Wikipedia, Pbwiki),
- t) Virtual worlds (e.g. Second Life),
- u) Emails,
- v) QR



1.2. WHEN AND BY WHOM SHOULD IT BE USED?

The guidelines contained herein are recommendations for all the digital marketing content controlled by ABRABE and its members, and covers both paid and non-paid actions, especially communication made through social media, blogs, websites and apps.

Content controlled by ABRABE refers to all that is produced or commissioned by it, or all that is broadcast on platforms whose control is, by law, the responsibility of ABRABE or its members. This includes all and any content generated by users and posted or shared within a platform controlled by the institution.

To sum up, we suggest using this guide in the following cases:

- Ads in digital media
- Sponsorship of websites and other digital media
- Educational websites maintained by ABRABE or its members
- Website of ABRABE or its members
- Social media
- Online promotions

Third parties

The guidelines provided in this document apply to actions carried out by ABRABE or its members, as well as to outsourced companies and professionals, especially advertising agencies. We recommend including in the service agreement a requirement for partners to follow this guide while carrying out digital marketing initiatives.

We also recommend drafting the agreement in a direct and objective language, clearly specifying the responsibilities of each party in a way that is easy to understand, always updated and available for consultation.

1.3 BASIC CONCEPTS USED IN THIS GUIDE

Age confirmation

A mechanism for users to inform their birth date and country of residence to verify whether they can legally purchase alcoholic beverages. Age verification mechanisms may vary depending on the technology available.

Direct interaction

Any situation in which users can interact directly and actively with the brand and not just watch or listen to online content. Examples of direct interaction include sharing and posting content produced by the user or spaces to comment on or reply to digital marketing pieces.



Direct digital marketing

Includes all marketing actions in which there is direct interaction between the brand and the users, such as when the brand contacts the individual by personal email or mobile phone.

Minimum drinking age (ILCC)

The minimum age required for the purchase of alcohol, which varies from one country to another. In Brazil, the minimum drinking age is 18.

User-Generated Content (UGC)

Any content produced by users without any association with the advertisers. Could be text, videos or images.

Shareable content

All the digital content related to the brand that can be forwarded and/or shared by a user with other users. Includes static content available for download or streaming.

Message on responsible consumption

Messages conveyed in marketing actions for alcoholic beverages, recommending responsible consumption. The content and presentation of such messages may vary from one company to another.

Personal information

All and any information that may be used to identify an individual.

Homepage

The page that serves as the gateway to a website or to a particular section of a website.

Source: 2013 OECD Privacy Framework (Translated and adapted)



2. CORE PRINCIPLES

2.1. ADULT AUDIENCE

As in traditional media, marketing of alcoholic beverages in the digital media must always be targeted at an adult audience and never at people below the minimum drinking age. As such, all communication targeted at this universe must comply with the following guidelines:

a. Distribution: The 70% rule

We recommend that all digital marketing actions be broadcast in media where at least 70% of the audience is above the minimum drinking age. This guideline applies to both actions that require user interaction with the brand and those where this is not possible.

b. Shareable content

Whenever a platform controlled by ABRABE or one of its members provides tools for sharing, we suggest adding a warning to users clarifying that the content must not be sent to people below the minimum drinking age.

We recommend that this message be visible or accessible through an equally visible link, and displayed whenever it is possible to share digital content, i.e. on social media or mobile apps. The same recommendation applies to all content submitted through email marketing. All material available for download must have the appropriate warnings about responsible consumption of alcoholic beverages.

2.2. RESPONSIBLE CONSUMPTION

We recommend that digital marketing actions always encourage the responsible consumption of alcoholic beverages, without abusing them but in conscientious manner.

a. Where to display the message

Whenever possible, we suggest displaying the messages on the homepage encouraging responsible consumption.

Alternatively or additionally, all digital marketing actions for alcoholic beverages may include a tab on the subject. This recommendation is particularly useful in the case of social media.



2.3. PRIVACY

ABRABE and its members must always respect the privacy of their users.

a. Collection of data

We recommend that all email addresses be collected only with consent and that the "Terms and Conditions" of use of this information be available online.

We suggest adopting the procedure of including a box in the registration form. As a standard, we recommend that this area be always displayed blank such that users must actively check it to express their interest in providing their email address.

b. Sending of information

The marketing content will only be sent to users after their authorization and in accordance with the "Terms and Conditions" of the service. We also suggest that communication through email be made from a valid and active email address that can receive replies from users.

The option for users to remove their address from the mailing list must always be available, and upon receiving such a request we recommend always complying with the deadline established in the "Terms and Conditions" to unsubscribe.

c. Identification

We recommend including the following information in marketing emails:

- Instructions on how to opt out of the mailing list
- Correct information about origin of email
- The brand or name of ABRABE or its members and a physical postal address

2.4 TRANSPARENCY

We recommend clearly informing the audience of any payment made for the publication of any material or message on blogs, Twitter, Facebook, websites or other digital media.

Similarly, whenever an employee or agent of ABRABE or one of its members makes any comment regarding alcoholic beverage consumption or an event sponsored or funded by these institutions, they need to make employment relationship clear.

3. AGE VERIFICATION

Whenever there is direct interaction between the user and the ABRABE brand (or any of its members), we recommend establishing a mechanism to control the user's age to make sure that they are above the minimum drinking age.

3.1. WHERE SHOULD IT EXIST

On all pages, games, widgets and apps related to ABRABE or its members, except when the user is already in an environment where age verification is required.



3.2. HOW TO DO IT

We recommend verifying age through a combination of information on the user's birth date and country of residence. This information may be obtained through a form to be completed by visitors or by using technologies that enable automatic collection of such information.

Whenever a visitor is below the minimum drinking age, a message should be displayed informing that they are not authorized to access the content, because the material is for adult audiences only. We suggest that age verification pages also include the "Terms and Conditions" of use, "Privacy and Cookies Notice" and a reminder about responsible consumption of alcoholic beverages.

If the age verification mechanism has the option to record user information for future use, an additional message should be displayed, warning the user about the possible consequences of using this option on a shared computer.

When the user actively informs their age, we recommend developing a system that prevents them from easily returning to the entry form to enter a new birth date. We suggest that the system block fresh attempts for at least five minutes.

Alternative

If the digital platform allows direct interaction between the user and the brand but offers no age verification mechanism, we recommend considering the following three conditions:

1. That at least 70% of the platform's audience is above the minimum drinking age;
2. That a warning message is displayed to users, making it clear that the content is for people above the minimum drinking age;
3. That the platform provides mechanisms to remove or moderate inappropriate content generated by users.

3.3. SPECIFIC GUIDELINES FOR EACH MEDIUM

a) Facebook

Since Facebook has its own user age verification technology, no external mechanism is required. However, it is advisable that you configure the page to make the content available only to people above the minimum drinking age.

In addition, we recommend including a message on the page warning that the content must not be read, accessed or shared with individuals below the minimum drinking age. Communication on Facebook pages controlled by third parties can only be made if the channel's audience complies with the 70% rule.

b) Applications

If the online store allows choosing the buyer's age, we recommend using this option (iTunes, for example, has this tool).

We also recommend enabling the feature that blocks download of the app if the age requirement is not met, whenever available.

If these options are not available, we recommend adding a warning in the application's description, informing that it should be downloaded only by people above the minimum drinking age.



c) Blogs

We recommend that all public relations blogs have an age verification page.

d) Bluetooth

We recommend that messages via Bluetooth connect directly to an age verification page, except when used in environments where access is limited to people above the minimum drinking age (such as nightclubs and bars).

e) Instant messaging

Its use is recommended only when the recipient's age is verified to be above the minimum drinking age during registration.

f) Twitter

We recommend including a warning on the account's homepage, informing that the content is only for people above the minimum drinking age.

g) Mobile devices

In the case of advertising on third-party mobile websites, the suggestion of the 70% rule applies. In raffles where people can participate through mobile phones, we recommend connecting users first to an age verification page before allowing their registration.

We recommend sending direct messages to mobile devices only after the user confirms to be above the minimum drinking age. We advise against accepting telephone bills in the name of a person who is a major as confirmation, because teenagers could use devices registered by their parents.

h) Games

Advertising actions in this type of media is only recommended when the game's audience complies with the 70% rule, or when the game's sale is restricted to people over 18 years of age.

i) Photo sharing apps (e.g. Flickr, Instagram)

We suggest that contributions to pages on Flickr or other similar websites not be made if there are no tools to pre-moderate the posts or to guarantee removal of inappropriate content. Photos can be sent to photosites provided the channel's audience complies with the 70% rule.

j) Podcasts

We recommend posting only on websites that have an age verification page.



l) QR codes (Quick Response Codes)

Unless they are located in zones where access is limited to individuals above the minimum drinking age (such as nightclubs or bars), we recommend that QR codes first take users to an age verification page. In addition, the QR code should be accompanied by a warning that the content is for people above the minimum drinking age.

m) Digital installations during events

Except when installed in an area where entry is restricted only to individuals above the minimum drinking age, we recommend that these actions include an age verification page or be directly controlled by a person, who should guarantee access to people above the minimum drinking age only.

n) RSS Feeds (Really Simple Syndication feeds)

Before connecting to the content, we recommend asking users to go to an age verification page on the original website.

o) Search and optimization marketing

We suggest that the search links (keywords, for example) direct users to the website's age verification page.

p) Video sharing services (e.g. YouTube, Vimeo, Hulu, Instagram)

We recommend that all video material available on these websites be preceded by an age warning, regardless of the possibility to download it or not. We also recommend that they be sent only to websites that comply with the 70% rule.

t) Virtual Worlds (e.g. Second Life) and Wikis

We recommend that these too comply with the 70% rule.

4. CONTENT

It is necessary to guarantee that all content produced by ABRABE and its members complies with strict ethical standards. The following instructions help to maintain the desired level for such communication, guaranteeing that all parties involved in digital marketing strategies, whether they are direct employees or outsourced service providers, will always emphasize the narrative of responsible consumption of alcoholic beverages, without encouraging abuse or consumption by people below the minimum drinking age.



4.1. WHAT IS CONTENT?

This concept encompasses content of any nature, including musical, pictorial, graphic and audiovisual work, sound recordings, text and interactive resources. It also includes user-generated content.

Hence, we recommend that all content posted by users on websites, pages or online/mobile applications owned by the company or on third-party websites in which the company has editorial control, be monitored and moderated, and comply with the "Terms and Conditions" and the following rules:

4.2. INSTRUCTIONS BY TOPIC

a. Abuse

Excessive or irresponsible consumption of alcoholic beverages must not be encouraged or justified. Similarly, abstinence or moderation must not be criticized or perceived as something negative.

Images of people who appear to be intoxicated or who give the idea that intoxication is acceptable, must not be used.

Violent, aggressive, illegal, dangerous or antisocial behavior must not be suggested.

Allusion to illegal drugs must be avoided.

All digital marketing actions must include a message on the responsible consumption of alcoholic beverages, clearly legible and visible. The message on responsible consumption must be written in a language that is easy to understand by the target audience and adapted to local situations.

b) Minors

The content must not be targeted at minors.

We recommend that models and actors under 25 years of age not appear in digital marketing actions.

Objects, images, styles, symbols, colors, songs or characters (whether real or fictional, including cartoon characters or celebrities) that mainly attract the attention of children or teenagers must not be used.

c) Responsible driving

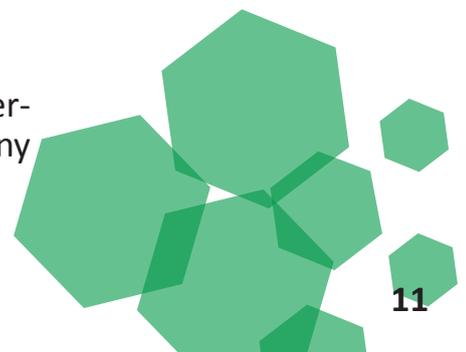
Do not suggest that the consumption of alcoholic beverage is acceptable before or while driving motor vehicles of any kind, including boats, jet skis, snow vehicles or aircraft.

d) Dangerous activities, Workplace & Recreation

Do not suggest that the consumption of alcoholic beverages is acceptable before or while operating potentially dangerous machinery, or performing any potentially dangerous activity, whether recreation or work.

e) Health aspects

Do not suggest that alcoholic beverages have therapeutic properties or that their consumption may help prevent, treat or cure any disease.



g) Alcohol Content

Information about the alcohol grade of the beverages may be shown, but the high level of alcohol content must not be exalted, nor must low content be treated as a strategy to avoid abuse.

h) Performance

Do not suggest that consumption of alcohol beverages increases mental capacity or improves physical or sexual performance.

Consumption of alcoholic beverages must also not be shown as a requirement for social acceptance or for success, or as something capable of generating greater sexual attraction.

4.3. USER-GENERATED CONTENT

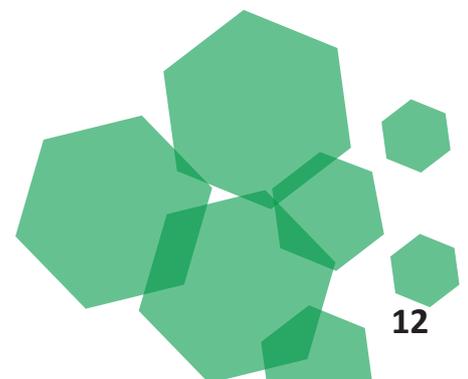
We suggest that all user-generated content posted on platforms controlled by ABRABE or by its members be frequently moderated.

We recommend that the frequency of monitoring of user-generated content for each platform maintained be defined in the code of good marketing practices of each company. Similarly, we recommend that each of these platforms open to user-generated content display the terms and conditions of use to be complied with by users.

We also recommend that users be informed that the publication of their content is subject to compliance with the terms and conditions and be instructed to only post content for which they own the copyright.

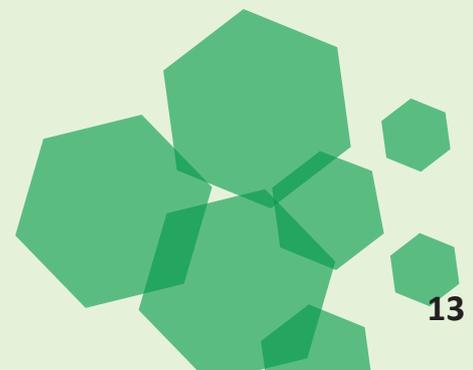
4.4 DO IT RIGHT

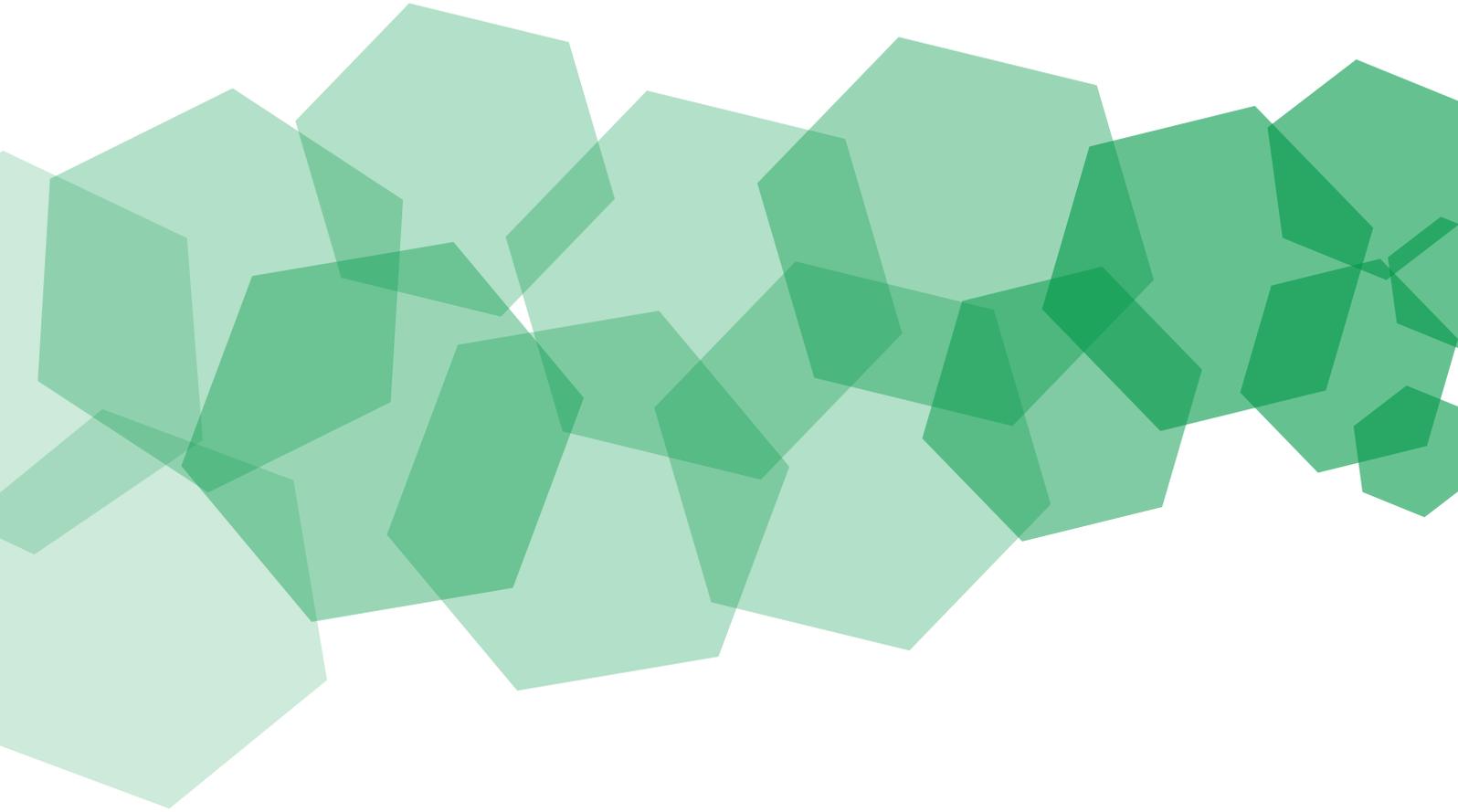
- Only use material to which you own the copyright.
- Photos and videos taken at events require written consent from all those visible and identifiable in them.
- Moreover, this material can be used only with due authorization from the photographer who owns the copyrights.
- If a deadline is set for the right to use a certain material, it must be used only until the deadline expires.
- Always provide a contact number through which people can contact you if they suspect that the material breaches copyrights or find any other problem related to intellectual property.



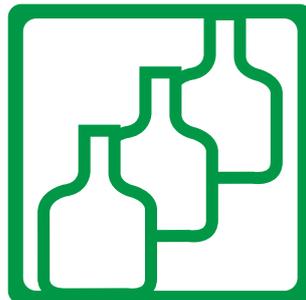
About ABRABE

The Brazilian Beverage Association (ABRABE) is an entity that represents the nationwide beverage sector, which brings together producers, representatives, importers and exporters of cachaça, wine, spirits, beer and energy drinks, among dozens of other categories. The association currently has 40 members, which represent the vast majority of the market and own the leading Brazilian and global beverage brands. One of ABRABE's goals is to instill in its members a permanent commitment to a responsible stance on the consumption of alcoholic beverages.





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