



PUBLIC CONSULTATION PAPER
GUIDELINES ON THE MARKETING OF
INTOXICATING LIQUOR

19 July 2024

This document is issued as a source of information to interested parties and the general public. The information in this document is intended as a guide only. For this reason, it should not be relied on as legal advice or regarded as a substitute for legal advice in individual cases. The information contained in this document may be subjected to changes without notice.

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GLOSSARY AND INTERPRETATION

CMCF	means the Communications and Multimedia Content Forum of Malaysia.
CC 2022	means the existing Malaysian Communications and Multimedia Content Code.
Guideline	means Guidelines on The Marketing of Intoxicating Liquor.
PC	means this Public Consultation.
PC Paper	means this Public Consultation Paper.

PREFACE

The CMCF has launched this public consultation to solicit views and comments from the industry, interested parties, and members of the public on the proposed Guideline, and whether there are additional issues that this proposed Guideline should address in regulating advertising of intoxicating liquor within Malaysia's digital marketing landscape.

Part A of this PC Paper introduces the rationale and purpose of this PC as well as the approach taken in this PC Paper.

Part B of this PC Paper outlines the essential components of the Guideline.

Part C of this PC Paper sets out the table of response which CMCF seeks to views on the proposed components of the Guideline.

CMCF will take into consideration all submissions received within the PC period. Findings will be set out in a report.

CMCF anticipates full participation from industry participants, interested parties and members of the public in this PC.

A. INTRODUCTION

1. Rationale and purpose of this PC

One key update in the CC 2022 involves the advertisement of intoxicating liquor. While such advertisements remain prohibited on TV and radio, they are now permitted on electronic media platforms based in Malaysia, aligning the rules with those for print and online platforms.

To clarify and facilitate the implementation of this provision, this Guideline was developed. This Guidelines provides a comprehensive explanation of international best practices for marketing intoxicating liquor which reflects the

industry's commitment to responsible advertising.

Given the fast-paced evolution of digital marketing, this Guideline will be reviewed and updated regularly to stay current with new trends and practices.

In this regard, a working group was formed to discuss international standards and best practices for advertising and promoting intoxicating liquor on digital platforms, providing a comprehensive and detailed explanation of global best practices in liquor marketing.

The proposed Guideline is the result of gathering information from stakeholders, including contributions from CMCF members and interest groups. These consultations were invaluable in providing crucial information and insights into relevant issues and recommendations.

2. Submission of Comments

2.1 Throughout this PC Paper, CMCF seeks views and comments on the proposed Guideline set out in **Annex A**.

2.2 CMCF encourages comments on:

- (a) specific questions that are raised in this PC Paper; and
- (b) any additional issues concerning the marketing of intoxicating liquor on digital platforms that are relevant and necessary to enhance consumer protection within the communications and multimedia industry.

2.2 All comments and feedback must be submitted by **19 August 2024** to secretariat@contentforum.my.

B. THE GUIDELINE

1. Definition and Interpretation

1.1 The following are definitions that have been introduced for reference in the Guideline:

Age affirmation mechanism is a gateway in which a user is required to provide his/her year-of-birth to affirm that he/she is of legal purchasing age. Age-affirmation processes may vary according to the available technology.

Brand(s) refers to intoxicating liquor products made by the company.

Direct interaction is triggered whenever a user is provided with the ability to engage with the brand directly and actively, beyond just viewing or listening to content (e.g., sharing content, posting content, responding to a direct digital marketing communication).

Forwardable content means all branded digital content – including static, streaming, and downloadable – which can be forwarded and shared by a user to or with other website users.

Influencer is defined as person(s) or group(s) who either on a personal capacity share their own independent opinions or are engaged and paid or paid by Advertisers (either in cash or other consideration) to advertise products or services on their own social media channels because of their social media influence on Consumers, and/or the advertiser has editorial control over the content.

Intoxicating liquor includes any alcohol, or any liquid containing more than 1.14 per centum volume over volume of alcohol, which is fit or intended to be or which can by any means be converted for use as a beverage.

Landing page is any web page that serves as the entry point for a website or a particular section of a website.

Legal purchasing age (LPA) is the minimum age to consume or purchase intoxicating liquor.

Personal data means any information relating to an identified or identifiable individual.

Responsible drinking messages (RDM) are messages featured in intoxicating liquor beverage marketing communications advocating responsible drinking. Its content and design may vary from one intoxicating liquor beverage company to another.

User generated content (UGC) is all content – including text, videos, and images – produced by individual not associated with the advertiser.

2. Basic Principles

2.1 All advertisements should be legal, decent, honest, truthful and must be prepared with a due sense of social responsibility.

2.2 Inappropriate content for intoxicating liquor advertising and marketing materials are not permitted and creative elements are to be considered from the viewpoint of a reasonable adult of LPA, and in the overall context

of the marketing communication.

3. Preventing Underage Appeal

3.1 All marketing communications content shall not be advertised or marketed in any manner targeted at or primarily appealing to persons below the LPA.

3.2 All person featured in the marketing communications must be over and appears 25 years of age.

3.3 Marketing materials and promotions shall not depict anyone under LPA.

3.4 Brands must be able to demonstrate they have used appropriate tools and/or have taken care in evaluating audience composition to select and target anyone above LPA audiences prior to the advertising. For this purpose, Brands may use the following methods to ensure that only persons above LPA can access the content:

- select website users based on the registered age or year-of-birth of the device owner and/or the logged-in user;
- age affirmation mechanism (age-gated access to online intoxicating liquor advertising on brand websites, brand social media pages or apps where website users are required to enter year-of-birth before accessing the platform);
- audience composition.

4. Responsible Drinking Messages

4.1 Brands should require on all marketing communications to have a Responsible Drinking Message (RDM), including everyone that does marketing communications on their behalf, such as influencers.

4.2 The RDM must be clear, visible and placed on the welcome screen or the landing page.

4.3 The RDM should be expressed in the language most easily understood by the target audience and adapted to local situations.

5. Product Placement

5.1 Brands shall take reasonable efforts to ensure that placements are only located in media where at least 70% of the audience is reasonably expected to be of LPA.

6. Health, Therapeutic, Performance or Functional Benefits

6.1 Intoxicating liquor strength or potency should never be the dominant theme or primary focus in any marketing and it must not be given undue emphasis, such as being highlighted or printed in a larger font or a different colour. For instance, terms such as "extra strength" or "super strength" are advised to be avoided.

7. Responsible Drinking

7.1 Marketing materials must promote moderate drinking in all their marketing communications. They should never portray or associate with drunkenness or excessive drinking.

8. Violence, Anti-Social Behaviour and Cultural Contexts

8.1 Marketing communications should not portray or suggest any association with anti-social behaviour, nor depict situations where intoxicating liquor is being consumed illegally or in conjunction with explicit or implicit illegal activity of any kind.

8.2 Marketing communications should respect cultural contexts,

acknowledging local differences in interpretation and sensitivity.

9. Social & Sexual Success

9.1 Marketing communications must not imply or claim that intoxicating liquor consumption is necessary to achieve social acceptance and drinking enhances sexual attractiveness.

10. Use of Influencers

10.1 This Guideline applies to all paid and incentivised influencer content where there is a contractual or other material relationship in place between the producer and the influencer.

10.2 All influencers must be at least 25 years old and reasonably appear to be of LPA and at least 70% of their followers must be of LPA.

10.3 All paid influencers must age-gate posts on digital platforms to prevent those under the LPA from accessing this content.

10.4 Influencers shall make adequate disclosures in promotional posts whenever they have a "material connection" to brands. They should not assume consumers know about an influencer's brand relationships, even if a partnership is well-known.

10.5 Influencer posts must be monitored for compliance and fixed or removed within 72 hours if they are not compliant. If the influencer does not comply, the relationship will be reassessed and could be terminated.

11. User Generated Content (UGC)

11.1 UGC posted on brand-owned and/or controlled digital platforms should be moderated on a regular basis and the UGC policy need to be included in the community guidelines.

12. Forward Advance Notice

- 12.1 Any material designed for sharing or downloading must include a clear warning that it should not be shared with anyone under the LPA in the ABOUT section to cover all content on the brand-owned platform.

13. Privacy Policy

- 13.1 Brands must prioritize user privacy and ensure compliance with privacy policies governing the collection of personal information in accordance with the Personal Data Protection Act 2010.

C. TABLE OF RESPONSES

CMCF would like to seek views on the proposed components of the Guideline

RESPONSE

No.	Components	Feedback
1	<p>Online intoxicating liquor advertisement must not be appealing to persons below the Legal Purchasing Age (LPA), which is 21 years old. Do you agree that the platform should require users to enter their birth year before accessing the content?</p> <p>Details can be found in the section titled "2. Preventing Underage Appeal: Age-affirmation Mechanism" on page 8 of the Guideline.</p>	<input type="checkbox"/> Agree <input type="checkbox"/> Not Agree Feedback:
2	<p>On digital platforms, brands must protect individuals below the legal purchasing age by preventing direct interaction with the brand. Do you agree that if a platform doesn't verify age, the brand must take reasonable efforts to ensure that at least 70% of the audience is of legal purchasing age?</p> <p>Details can be found in the section titled "2. Preventing Underage Appeal: Audience - 11(a)" on page 8 of the Guideline.</p>	<input type="checkbox"/> Agree <input type="checkbox"/> Not Agree Feedback:

<p>3</p>	<p>An age disclaimer or statement should be prominently displayed to remind website users that the content is intended for individuals of legal purchasing age only.</p> <p>Details can be found in the section titled "2. Preventing Underage Appeal: Audience - 11(b)" on page 10 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>
<p>4</p>	<p>User generated content that is placed on sites or platforms controlled by brand should be moderated on a regular basis, and if inappropriate, removed as quickly as possible.</p> <p>Details can be found in the section titled "2. Preventing Underage Appeal: Audience - 11(c)" on page 10 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p> <p><input type="checkbox"/></p>
<p>5</p>	<p>All persons featured in marketing communications must be over 25 years of age and should not appeal to individuals below the legal purchasing age.</p> <p>Details can be found in the section titled "2. Preventing Underage Appeal: Persons featured" on page 11 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>

<p>6</p>	<p>Responsible Drinking Message must be clear, easily understood, and placed on the landing page.</p> <p>Details can be found in the section titled "3. Responsible Drinking Messages" on page 12 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>
<p>7</p>	<p>The brand must make reasonable efforts to ensure that advertisements are only placed in media where at least 70% of the audience is reasonably expected to be of legal purchasing age.</p> <p>Details can be found in the section titled "4. Product Placement: Audience composition" on page 14 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>
<p>8</p>	<p>Intoxicating liquor strength or potency should not be the main focus of any marketing, and it must not be emphasized excessively. Do you agree that terms like "extra strength" or "super strength" should not be used?</p> <p>Details can be found in the section titled "5. Health, Therapeutic, Performance or Functional Benefits" on page 15 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>

<p>9</p>	<p>Marketing materials must promote moderate drinking in all their communications. Do you agree that the language, labelling, slogans, or imagery of promotions must not suggest excessive consumption?</p> <p>Details can be found in the section titled "6. Responsible Drinking" on page 17 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>
<p>10</p>	<p>All advertisements for intoxicating liquor should never associate with anti-social behaviour or illegal consumption.</p> <p>Details can be found in the section titled "7. Violence, Anti-Social Behaviour and Cultural Contexts" on page 17 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>
<p>11</p>	<p>Marketing materials should not claim or imply that drinking intoxicating liquor is necessary for social, professional, financial, academic, sporting, or social success.</p> <p>Details can be found in the section titled "8. Social & Sexual Success" on page 18 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>

<p>12</p>	<p>All paid influencers must age-restrict their posts on intoxicating liquor to prevent minors from accessing the content. Do you also agree that paid influencers must be over 25 years old and primarily appeal to adult audiences?</p> <p>Details can be found in the section titled "9. Use Of Influencers: Protecting those under the LPA" on page 20 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>
<p>13</p>	<p>Influencers must clearly disclose any "material connection" to brands in promotional posts, even if the partnership is well-known.</p> <p>Details can be found in the section titled "9. Use Of Influencers - Brands disclosure" on page 22 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>
<p>14</p>	<p>Any material intended for sharing or downloading must include a clear warning not to share it with anyone under the legal purchasing age. This should be included in the ABOUT section to cover all content on the brand-owned platform.</p> <p>Details can be found in the section titled "12. Forward Advance Notice (FAN)" on page 24 of the Guideline.</p>	<p><input type="checkbox"/> Agree</p> <p><input type="checkbox"/> Not Agree</p> <p>Feedback:</p>

15	Any other feedback on proposed revisions not addressed in the list above:
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ANNEX A

DRAFT OF GUIDELINES ON THE MARKETING OF INTOXICATING LIQUOR

Guidelines on the Marketing of Intoxicating Liquor

**Standards and Best Practices for the
Communications and Multimedia Industry for the
Advertising and Promotion of Intoxicating Liquor on
the Digital Platform**

**Communications and Multimedia Content Forum of
Malaysia (Content Forum)**

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Tel: 603-86809900
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Release Date:
DD/MM/YY

INTRODUCTION

1. In 2021, the Communications and Multimedia Content Code underwent a revamping exercise. Following extensive research, meticulous drafting and a nationwide public consultation, the new document was finalized and registered on 30 May 2022.
2. Content Code 2022 contains updated provisions relating to the advertisement of intoxicating liquor i.e. Part 3, para 8.5. While such ads are still prohibited for TV and radio, it is allowed when communicated over the electronic medium based in Malaysia. This was done to level the playing field with print and online platforms.
3. Following this, to ensure clarity and to streamline the implementation of this provision in the Content Code, a supplementary guideline was produced to include a more comprehensive and detailed explanation of international best practices relating to the marketing of intoxicating liquor.
4. This 'Guidelines on the Marketing of Intoxicating Liquor' (Guideline) is an extension of the industry's commitment to advertise intoxicating liquor responsibly, and was developed by the industry members, with input from public review.
5. Digital marketing activities are constantly evolving, and new trends occur rapidly. This Guideline will therefore be reviewed regularly and updated as necessary.

OBJECTIVES

6. This Guideline lays forth overarching fundamentals for all marketing communications relating to the advertisement of intoxicating liquor. It is developed to encourage uniformity in self-regulation, to assist members and companies in maintaining high standards of social responsibility in intoxicating liquor advertising via digital marketing.
7. This Guideline is aimed to provide an interpretation of the global standards and best practices in this sector. Advertisement of intoxicating liquor must uphold the concept of self-regulation as laid down in the Content Code.
8. The provisions set out in this Guideline should be applied in spirit and read in conjunction with other relevant legislation, regulations, guidelines, and regulations governing the advertisement of intoxicating liquor, including any amendments made to the same.

SCOPE

9. This Guideline applies to advertising and marketing communications as stated in Part 3, para 1.1 of the Content Code 2022.

"This part of the Code applies to Advertisements communicated over a networked medium and displayed on devices that can process Content electronically and includes television, radio, and Digital Media. The Code shall not apply to Advertisements content that does not utilise the networked medium."

10. Advertisers and operators of online marketplaces bear the primary responsibility for enforcing this Guideline. The obligation to comply with the specific guidelines that apply to them extends to all parties involved in the production and transmission of advertisements, including influencers, agencies, online publishers, broadcasters, and other advertising service suppliers, such as production houses, music composers, and designers.
11. This Guideline applies to all digital marketing communications, both paid and unpaid, for branded intoxicating liquor, including, but not limited to, advertising and marketing communications on websites such as social network sites and blogs, as well as mobile communications and applications, where the content of those communications is under the control of intoxicating liquor marketers.
12. This Guideline does not purport for legally enforceable responsibilities towards the parties involved, but shall be viewed as recommendations, unless specific regulatory or statutory requirements are cited. In the spirit of self-regulation, the Content Forum may advise the parties to withdraw content that is inconsistent of this Guideline.
13. This Guideline deals in general principles and does not seek to address every possible case or scenario that could arise. Examples included in the Guideline are not exhaustive. However, the principles and provisions in the following sections, should make clear what this Guideline is designed to achieve, and help industry members make the necessary judgments.

DEFINITIONS AND INTERPRETATION

For the purposes of this Guideline:

Age affirmation mechanism is a gateway in which a user is required to provide his/her year-of-birth to affirm that he/she is of legal purchasing age. Age-affirmation processes may vary according to the available technology.

Brand(s) refers to intoxicating liquor products made by the company.

Direct interaction is triggered whenever a user is provided with the ability to engage with the brand directly and actively, beyond just viewing or listening to content (e.g., sharing content, posting content, responding to a direct digital marketing communication).

Forwardable content means all branded digital content – including static, streaming, and downloadable – which can be forwarded and shared by a user to or with other website users.

Influencer is defined as person(s) or group(s) who either on a personal capacity share their own independent opinions or are engaged and paid or paid by Advertisers (either in cash or other consideration) to advertise products or services on their own social media channels because of their social media influence on Consumers, and/or the advertiser has editorial control over the content.

Intoxicating liquor includes any alcohol, or any liquid containing more than 1.14 per centum volume over volume of alcohol, which is fit or intended to be or which can by any means be converted for use as a beverage.

Landing page is any web page that serves as the entry point for a website or a particular section of a website.

Legal purchasing age (LPA) is the minimum age to consume or purchase intoxicating liquor.

Personal data means any information relating to an identified or identifiable individual.

Responsible drinking messages (RDM) are messages featured in intoxicating liquor beverage marketing communications advocating responsible drinking. Its content and design may vary from one intoxicating liquor beverage company to another.

User generated content (UGC) is all content – including text, videos, and images – produced by individual not associated with the advertiser.

DRAFT

1. BASIC PRINCIPLES

1. All marketing communications must:
 - a) be legal, decent, honest, and truthful;
 - b) be based on accepted principles of fair competition and good business practice;
 - c) be prepared with a due sense of social responsibility and based on principles of fairness and good faith;
 - d) be prepared with be clearly distinguishable in its marketing nature;
 - e) comply with all legislative and regulatory requirements;
 - f) not be unethical or otherwise impugn human dignity or integrity;
 - g) be mindful of sensitivities relating to local cultural values, gender, race, sexual orientation, religion; and
 - h) not employ themes, images, symbols, or figures that are likely to be considered illegal, offensive, derogatory, demeaning or disparaging.
2. In applying these requirements, creative elements are to be considered from the viewpoint of a reasonable adult of LPA, and in the overall context of the marketing communication.
3. Inappropriate content for intoxicating liquor advertising and marketing materials are not permitted. The inappropriate content that would violate this Guideline includes (but not limited to):
 - a) religious themes and religion,
 - b) products associated with the use of codes, terms, symbols, or words primarily appealing to persons below the LPA,
 - c) products that lead to consumer confusion with non-intoxicating liquor beverages,
 - d) depicts a child or features toys, illustrations, or animated characters that primarily appealing to persons below the LPA;
 - e) uses brand identification—including logos, trademarks, or names—on clothing, toys, games, game equipment, or other items intended for use primarily by persons below the LPA;
 - f) promotes intoxicating liquor use as a "rite of passage" to adulthood;
 - g) portrays persons in a state of intoxication or in any way suggests that intoxication is socially acceptable conduct;

- h) makes curative or therapeutic claims, except as permitted by law;
- i) makes claims or representations that individuals can attain social, professional, educational, or athletic success or status due to beverage intoxicating liquor consumption;
- j) degrades the image, form, or status of women, men, or of any ethnic group, minority, sexual orientation, religious affiliation, or other such group;
- k) uses lewd or indecent images or language;
- l) relies upon sexual prowess or sexual success as a selling point for the brand;
- m) uses graphic or gratuitous nudity, overt sexual activity, promiscuity, or sexually lewd or indecent images or language;
- n) association with anti-social or dangerous behaviours;
- o) depicts illegal activity of any kind.

2. PREVENTING UNDERAGE APPEAL

1. All marketing communications shall not be advertised or marketed in any manner targeted at or primarily appealing to persons below the LPA.
2. Marketing materials and promotions shall not depict anyone under LPA.
3. Any portrayal of content that are primarily appealing and targeted to persons below the LPA shall not be used.
4. Brands must be able to demonstrate they have used appropriate tools and/or have taken care in evaluating audience composition to select and target anyone above LPA audiences prior to the advertising.
5. Brands may use the following methods to ensure that only persons above LPA can access the content:
 - a) select website users based on the registered age or year-of-birth of the device owner and/or the logged-in user;
 - b) age affirmation mechanism (age-gated access to online intoxicating liquor advertising on brand websites, brand social media pages or apps where website users are required to enter year-of-birth before accessing the platform);
 - c) audience composition.

Age-affirmation Mechanism

6. To protect those under the LPA, websites and platforms owned or managed by brand, should implement an age-affirmation mechanism (e.g., age gating, subscription, single sign-in with social media profile, etc.). Wherever possible, these age-affirmation mechanisms should include a page that carries a field that requires the consumer to actively input their year of birth. This ensures that only website users who confirm they are at least of LPA can access the site.
7. This information can be provided either by directly asking the user or through technological settings, and it should be implemented before granting entry to the site to ensure that the user is over the LPA.
8. Whenever a user's access is denied through these age-affirmation mechanisms, an appropriate message should be sent to the user.

(Example: 'Sorry you are not of the LPA to enter this site /section of this site.')

9. If a user enters a year of birth that equates to being under the LPA, they should be given an appropriate intoxicating liquor social responsibility message or redirected to an appropriate responsible drinking website. Website users should not be able to easily click back and re-enter a different year of birth.
10. Additional age affirmation prompts should be located within sections of the website where website users can purchase merchandise of intoxicating liquor products.

Audience

11. If the digital platform where the marketing communications are placed allows direct interaction but does not include any age affirmation mechanism, the brand should consider the following three conditions before placing their digital marketing communications:

- a. **The brand shall endeavour to take reasonable efforts to ensure that the platform's audience for which the marketing communication is intended should meet at least 70% of LPA;**

In case the digital platform does not provide age affirmation mechanisms, brand shall endeavour to take reasonable efforts to meet the 70/30 rule for

audience composition, including an age disclaimer reminding website users that the content is intended for those above the LPA only, and ensure the platform provides a mechanism to remove or moderate inappropriate content. A brand safety list should be developed to prevent content from being placed near underage content, such as youth-oriented programmes or content, or educational content for those under the LPA.

In determining whether a particular third-party website or platform is a suitable vehicle in terms of audience profile being at least 70% above the LPA, brand may refer to the following sources, in order of reliability.

- i. **Syndicated data source** – This is generally the most reliable evidence of a website’s audience profile. The most appropriate indicator is the most recent three months’ site average of available audience data of unique website users (where seasonal fluctuations are evident the previous year’s data should also be considered, if available). However, brands should be aware that some syndicated sources do not cover all ages (for example, some suppliers’ data currently does not include individuals aged under 15). Therefore, these sources should be used with caution, and allowance should be made for unrecorded website users under the LPA.
- ii. **Independent demographic survey** – If a website is not measured by a syndicated data source, or such data does not provide convincing evidence whether the 70% threshold has been met, brands should ask the website publisher to provide an independent demographic survey of the age profile.
- iii. **“Registered user” database** – If neither of the above sources are available, or these data do not clearly demonstrate whether the 70% LPA threshold has been met, but the website publisher operates a “registered user” database incorporating an age confirmation element, brands should use this as evidence of the likely age profile of overall website users.

b. An age disclaimer or statement should be placed reminding website users that the content is intended for individuals of LPA only;

When a digital media channel, app or platform uses the 70/30 rule only, brands need to ensure that a statement is placed reminding website users that the content is intended for adults only.

c. The platform should provide a mechanism to remove or moderate inappropriate User Generated Content (UGC).

All User Generated Content that is placed on sites or platforms controlled by brand should be moderated on a regular and frequent basis, and if inappropriate, removed as quickly as possible.

Primary Appeal

12. Brands must be able to demonstrate that they used materials that are primarily appealing to individuals of LPA, and that best efforts have been taken to ensure they are not appealing to persons below the LPA.
13. To provide clarity and guidance, herein is a non-exhaustive list that must **not** include any of the following in marketing materials:
 - any objects, images, styles, logos, symbols, behaviours, mascots, characters (either real or fictional, including cartoon figures, animals or celebrities), icons, motifs, interactive games or gaming equipment, children's toys, clothing, colours, music, fairy tales, schoolteachers, or drawing styles, symbols and designs that are clearly childish (e.g. children's scribbles or drawings) or other elements that are primarily appealing and targeted to persons under the LPA;
 - digital marketing elements (e.g. lenses or filters) that are primarily appealing and targeted to those under the LPA;
 - using role models, celebrities or other testimonials that primarily appeal to those under the LPA;
 - using names or packaging that could be confused with confectionary primarily appealing and targeted to those under the LPA;

- using settings primarily used by those under the LPA (such as schools or playgrounds), including depicting models in these settings even if the model used in the advertisement or promotion is over 25 years of age;
- using props, characters, or scenes commonly appealing to those under the LPA;
- showing excessive liquor consumption and models under 25 years of age in the same frame;
- advertising or promoting intoxicating liquor alongside unrelated products or services primarily appealing and targeted to those under the LPA.

14. Brands should not allow their brand logos or trademarks to be licensed for use on materials or merchandise intended for use primarily by persons below the LPA.

Persons featured

15. All persons featured in a prominent role in marketing communications must be over and appears to be 25 years of age.
16. Marketing Communications should not primary appealing to persons below the LPA nor should they show these individuals consuming intoxicating liquor (nor feature a child or a teenager in a prominent shot).
17. Children’s TV presenters/celebrities/influencers that have a fan base that would be of primary appeal to those below the LPA should not be featured in all marketing communications.
18. For charity purposes, underage individuals can be featured in promotional material for charity as long as they are not "paid models or actors," and they are not depicted drinking intoxicating liquor or associated with branded products.
19. For celebrities, the "25 years or older" age rule applies if they are paid for appearing in brand marketing communications.
20. A group of celebrities (e.g. musicians, sports team) with members below 25 years old can be used in an advertisement or promotion, with 4 conditions:
 - a) there must be no single depiction of someone who is less than 25 years old;
 - b) there must be no drinking pictures;
 - c) there must be no activation on personal social media;
 - d) and the majority members must be over 25.

3. RESPONSIBLE DRINKING MESSAGES

1. A clearly visible Responsible Drinking Message (RDM) should be carried on all marketing communications:
 - a) Wherever applicable, the RDM should be placed on the landing page.
 - b) On brand websites, the RDM must appear on both the Age Affirmation Page (AAP) and the landing page. On applications, it must appear on either the Welcome screen or the landing page. The RDM may be repeated before entering AAP and landing page.

Content of RDM

2. The RDM should be expressed in the language most easily understood by the target audience and adapted to local situations.
3. The precise content of the message may be varied (determined by the individual company) but should advocate responsible drinking.

(Example: 'Drink Responsibly', 'Do not drink and drive', 'For people over legal drinking age only', 'Enjoy Responsibly').

4. The RDM may be tailored to a particular brand or campaign voice/style if it is deemed appropriate.
5. For markets with mandatory health warnings and/or messages, consideration may be given as to whether an additional RDM is necessary.
6. All brand-owned and controlled digital media will be monitored for content as website users might post about irresponsible drinking. Brands may act on it, by removing the content and/or responding to it.

Format of RDM

7. The RDM must be clearly legible and noticeable on all marketing communications. Unless it is technically not feasible, the RDM shall:
 - a) be prominent, and affixed in a clearly visible place
 - b) be in a font and/or colour which clearly contrasts with the background

- c) of a height of letters equal to 1/100 of the overall sum of height and width of the advertisement if no stricter minimum size is required by the industry or any local law or regulation. If the RDM consists of or includes a logo, it should be of an appropriate size to ensure legibility.
- d) use visual – dynamic online banner ads that rotate through a series of ‘frames need only include the RDM in one of those frames.

- 8. All websites and other brand owned or sponsored sites (e.g., Facebook, X, Instagram, TikTok, etc.) should contain an RDM.
- 9. Brands should also require everyone that does marketing communications for intoxicating liquor on their behalf, such as influencers, to include a RDM and/or to direct consumers, where appropriate, to reliable third-party online resources that discourage intoxicating liquor misuse.

4. PRODUCT PLACEMENT

- 1. Given the diversity of local regulations applying to product placement (particularly regarding age of viewers), the variety of forms it may take, and the importance of taking consumers’ interests and rights, this Guideline is to ensure that brand always meet the highest standards of responsible marketing by always be respectful of cultural and religious contexts and consider local differences in interpretation and sensitivity.
- 2. The consideration of product placement by brands should be guided by the following principles:
 - a) **Case-by-Case Approval:** Approval of product placement in specific projects or scenes is based on respective brand owners’ approval of the product placement project at the content level. The storyboard/script must be reviewed and approved prior to public release to ensure that the scene in which the product is placed (and, if possible, the scenes directly before and after) complies with this Guideline. If the script is not available for any legitimate reason, brand owners should at least be able to watch the final cut of the relevant scene before the project is publicly released.

- b) **Portrayal of drinking and driving:** Brands must make every effort to ensure that product placements support responsible intoxicating liquor consumption.
 - c) **Underage drinking:** Product placement should not portray purchase or consumption of their products by persons who are below the LPA.
 - d) **Primary appealing to persons below the LPA:** Brand must ensure that product placement, does not involve primary characters below the LPA, nor should the primary themes be, due to their content or presentation, specifically appealing to persons below the LPA (for example digital comics, or teenage magazines).
 - e) **Portraying alcoholism/alcohol abuse:** Product placement shall not portray characters using products irresponsibly or abusively or portray alcoholism, unless the depiction supports a responsible-use message.
 - f) **Audience:** Product placement should not be placed in any media unless the brand can reasonably ensure, to the best of their ability, that 70% of the audience is expected to be of LPA.
3. Product placement should avoid using language, images, or themes that could be perceived as offensive, disrespectful, or demeaning to any group based on gender, sexual orientation, religion, nationality, ethnicity, minority status, disability, or age.

Audience composition

- 4. Brands shall endeavour to take reasonable efforts to ensure that placements are only located in media where at least 70% of the audience is reasonably expected to be of LPA.
- 5. A placement will be considered compliant if the brand, to the best of its ability, can provide that the audience composition data reviewed prior to the placement satisfies the 70% audience and other placement criteria.

Rules related to the actors/ artists featured

- a) **Personal background of the artists/actors involved**

Brands should refrain from associating or placing their products with music artists or actors who:

- Are publicly known for having a problematic relationship with intoxicating liquor (such as intoxicating liquor addiction, rehab, etc.) within a period of two years.
- Have caused, or have been involved in criminal incidents (rape, murder, drink, and drive incidents, etc.). For such serious offenses, brand may withhold associations for several years or longer, depending on the severity of the incident and at the brand's discretion.

b) Age of the actors

All actors handling and/or consuming a product in the relevant scene should be over the LPA.

c) Age of the music artists:

- The music artist(s) featuring in a prominent role in the videoclip should be over the LPA.
- All individuals, including the music artist(s), depicted handling and/or consuming the relevant product in the placement scene, must be at least 25 years old.

d) Age of the audience:

Brands should endeavour to make reasonable efforts, utilizing reliable and up-to-date audience composition data, to ensure that at least 70% of the audience is over the LPA.

5. HEALTH, THERAPEUTIC, PERFORMANCE OR FUNCTIONAL BENEFITS

1. Intoxicating liquor strength or potency should never be the dominant theme or primary focus in any marketing and it must not be given undue emphasis, such as being highlighted or printed in a larger font or a different colour. For instance, terms such as "extra strength" or "super strength" are advised to be avoided.
2. Marketing communications should **not**:
 - a) suggest physical or sexual prowess, power, or strength as a result of consuming intoxicating liquor beverages;

- b) suggest that the products can act as an aid to removing personal inhibitions;
- c) give the impression that consumption of intoxicating liquor products can enhance mental ability or improve physical performance, skills, or strength. However, it is acceptable to depict a participant enjoying the product in a relaxing, celebratory, or team setting after the activity has taken place;
- d) claim or imply that the product may have therapeutic properties or provide dietary benefits, or suggest that consumption may prevent, treat, or cure any human disease or illness.;
- e) make any performance benefit claims, nor promote the product based on functional or performance benefits, such as energising or stimulating properties, or suggest that it can play a role in managing weight or hydration;
- f) attempt to hide the nature or strength of an intoxicating liquor beverage, place improper emphasis on its intoxicating liquor strength, or suggest that it is preferred due to its superior strength. However, it is permissible to emphasize the low strength of the intoxicating liquor beverages;
- g) use gifts, drinking vessels or cocktail names with medical or pharmaceutical connotations to market product;
- h) market intoxicating liquor to pregnant women nor portray pregnant women in advertising;
- i) market intoxicating liquor as thirst quenching, hydrating, or refreshing, nor imply or suggest that they be consumed instead of non-intoxicating liquor beverages;
- j) imply that players/performers consume intoxicating liquor before or during their performance, or that such consumption enhances performance in any manner.

6. RESPONSIBLE DRINKING

1. Marketing materials must promote moderate drinking in all their marketing communications. They should never portray or associate with drunkenness or excessive drinking.
2. The marketing of the product should portray responsible drinking as a relaxed, sociable, and enjoyable part of life, promoting responsible consumption of intoxicating liquor.

3. The brand names and corresponding packaging, labels, internet, and social media domain names for the products must not convey sexual innuendo or use terms typically associated with intoxication or irresponsible intoxicating liquor consumption.
4. The use of language, labelling, slogans or titling of a promotion or images must not suggest rapid or excessive consumption.
5. Marketing communications may **not**:
 - a. depict, promote, or sponsor situations where intoxicating liquor is being consumed rapidly in large quantities, involuntarily, as part of a drinking game or as a result of a dare or peer pressure;
 - b. show any images of people drinking heavily or rapidly or in a state of drunkenness;
 - c. portray persons lacking or having diminished control over their behaviour, movement, vision, or speech as a result of consuming intoxicating liquor, or in any way suggest that intoxication is acceptable;
 - d. present refusal, abstinence or moderate intoxicating liquor consumption in a negative light, an individual's choice whether to drink will always be respected;
 - e. depict or suggest intoxicating liquor consumption before or during activities that require a high degree of alertness, judgment, precision, or co-ordination (for example driving, operating machinery or other hazardous activities);
 - f. depict or suggest intoxicating liquor consumption during working hours at the workplace.
 - g. depict or include pregnant women or imply that the consumption of intoxicating liquor during pregnancy is acceptable.
 - h. make intoxicating liquor content or product strength the main theme of marketing communications, or claims for lower strength products, except for non-intoxicating liquor products;

7. VIOLENCE, ANTI-SOCIAL BEHAVIOUR AND CULTURAL CONTEXTS

1. All marketing communications should not portray or suggest any association with anti-social behaviour, nor depict situations where intoxicating liquor is being consumed illegally or in conjunction with explicit or implicit illegal activity of any kind.

2. Marketing communications should respect cultural contexts, acknowledging local differences in interpretation and sensitivity.
3. Marketing communications may **not**:
 - a) portray or suggest any association with violence, including avoiding the trivialization or glamorization of violence;
 - b) associate the product with any activity or event where the intent is to cause harm or violence to anybody, including animals;
 - c) depict violent or antisocial behaviours, unless clearly recognizable throughout as humour, parody, satire, or spoof;
 - d) use images, text or language that allude to drug-taking behaviour;
 - e) use props, settings or scenarios that link the promotion of liquor to illicit drugs.
 - f) use images or messages associating intoxicating liquor consumption with risky or dangerous activities (such as skydiving, motor racing, drink driving or speed boating).
 - g) use stereotypes that link the advertising or promotion of intoxicating liquor with celebrating aggressive or risk-taking behaviour.
 - h) associate liquor with activities that encourage or condone aggressive behaviour towards others (such as competitions or challenges that pit patrons against each other, for example, arm wrestling).

8. SOCIAL & SEXUAL SUCCESS

1. The product may be portrayed as part of normal social experiences, such as the depiction of people who appear to be attractive or affluent, or those who seem to be relaxing or in an enjoyable setting.
2. The product preference may be portrayed as a mark of discernment or good taste; however, marketing materials will not imply or make any claim or representation that intoxicating liquor consumption is necessary to achieve social acceptance or professional, financial, academic, sporting, or social success.
3. Marketing communications may portray the product as part of a social or romantic setting, or depict people showing affection or other amorous gestures. However, they must ensure that the marketing does not imply that drinking enhances sexual attractiveness or is a requirement for sexual success.
4. The content of the scenes or images in marketing communications should **not**:

- a) imply that consumption of intoxicating liquor is necessary to ensure the success of an event or occasion;
- b) show individuals drinking or holding a glass containing the product (within a group setting) in a way that they may reasonably be perceived as being more popular or socially successful as a result of drinking;
- c) show or imply that drinking is a way to enhance one's confidence, solve social or personal problems or overcome inhibitions or shyness;
- d) suggest that drinking a certain brand has played a key part in the success of an event;
- e) suggest that intoxicating liquor can enhance mental or physical performance;
- f) suggest that the consumption of intoxicating liquor can be a catalyst for an extreme change in mood or state, or reduce social anxiety or boredom;
- g) suggest that intoxicating liquor can enhance sexual capabilities, attractiveness, masculinity, or femininity, or contribute to sexual success or seduction (for example, "Drink Z brand and be the envy of all your friends");
- h) portray nudity or people featured in marketing materials posed in a position or stance that is overtly sexual in nature (for example, intoxicating liquor product being poured over a naked person);
- i) objectify and/or overly sexualise an individual. Any image or illustration that unnecessarily focuses on someone's body or body parts (such as focusing on a person's torso) is likely to be interpreted as objectifying someone based on their gender or sex;
- j) depict someone in a highly sexualised manner;
- k) show strong sexual images (for example, a person lying on a bed wearing seductive underwear);
- l) associate the product with sexual success or suggest and/or make references to sexual activity;
- m) use language or images that are likely to insult or offend a reasonable person, or language or images that are discriminatory, vilifying or demeaning. This includes language or images that mock, ridicule, or deride certain personal characteristics, such as disability.

9. USE OF INFLUENCERS

1. This Guideline applies to all paid and incentivised influencer content where there is a contractual or other material relationship in place between the producer and the influencer.
2. All Influencers must meet the following criteria:
 - a) Be at least 25 years old and reasonably appear to be of LPA or older.
 - b) At least 70% of their followers must be of LPA, based on reliable, up-to-date information (e.g., Facebook audience demographics).
 - c) Have no known history of serious intoxicating liquor-related offenses, substance abuse, or irresponsible behaviour (e.g., excessive consumption, offensive conduct, violence).

Protecting those under the LPA

3. Where available, all paid influencers must age-gate posts on digital platforms to prevent those under the LPA from accessing this content. In cases where age-gating mechanisms for influencers are not yet effective on certain platforms, paid influencers must be over 25 years old and appeal primarily to adult audiences in accordance with the 70/30 rule. Brands should also continue to collaborate with digital platforms to advocate for the implementation of effective age-gating mechanisms to further restrict individuals under the LPA from viewing marketing communications.

Engagement

4. For paid content, all influencers should have a written agreement in place signed by both parties. This should include:
 - a) information linking to legal requirements relevant to national/regional context.
 - b) disclosure guidelines – asking influencers to disclose their link clearly and conspicuously to the brand so that consumers are left in no doubt about the association.

- c) responsibility guidelines – asking the influencer to comply with the brand's responsible marketing code including, ensuring content does not condone or encourage illegal behaviour or excessive consumption.
- d) best practice tools for influencers when engaging on social media platforms such as information on branded content pages and details on how to age restrict.
- e) feedback mechanisms so that influencers can flag any engagement or issues around responsible drinking with an agency or brand.
- f) for content featuring gifted product, influencers should be provided with clear terms of engagement that include disclosure guidelines and a responsibility to follow the brand's responsible marketing code.
- g) the responsibility for vetting, including the social media account/handle and details of what is to be vetted, should be raised, and clarified between influencers, an agency or brand and any others engaged.

6. All Influencer contents must **not**:

- a) depict or endorse irresponsible drinking behaviour (such as drinking and driving, excessive consumption, underage drinking, or engaging in dangerous activities);
- b) appeal primarily to individuals under the LPA or use imagery that primarily appeals to them (for example toys, cartoons, or Santa Claus);
- c) depict anyone under the age of 25 or that appears to be younger than LPA;
- d) depict or imply illegal, antisocial, violent, abusive, or dangerous behaviour of any kind;
- e) degrade the image, form, or status of any person or social or ethnic group;
- f) make fun of individuals that abstain from drinking;
- g) suggest that a drink can enhance mental or physical performance or provide curative or therapeutic benefits;
- h) make claims about other brands or competitor brands unless properly substantiated;
- i) disparage competitors or other brands;
- j) include third party trademarks or copyright (e.g., "Sipping some #[BRAND X] for the #Oscars" or including products with recognizable third-party logos, such as a Louis Vuitton monogram bag) without consent;
- k) tag or promote celebrities or public figures without consent.

Brands disclosure

7. Influencers shall make adequate disclosures in promotional posts whenever they have a “material connection” to brands. They should not assume consumers know about an influencer’s brand relationships, even if a partnership is well-known.
8. A “material connection” can exist any time when brand provides incentives or other benefits that could impact the influencer’s credibility, including:
 - a) monetary payments;
 - b) gifts;
 - c) special access privileges (including festival or backstage passes);
 - d) travel expenses;
 - e) any financial incentive, relationship, gift, or other connection that could even potentially impact an Influencer’s credibility must be disclosed to consumers.
9. The following is a non-exhaustive list on how influencers may disclose their connection to brands:
 - a) disclosures should be placed with the content – in each branded post and any subsequent post; (an endorsement in one tweet followed by a disclosure in the second tweet is not enough). All reasonableness should be taken to ensure that the disclosure can be viewed on the same page;
 - b) disclosures should be immediately visible to consumers in the original post. They should not be buried in a bio, profile page, about section, separate link, or at the end of posts or videos, or have to scroll under the fold or anywhere that requires a person to click MORE button;
 - c) disclosures need to be reasonably visible, readable, and suitable for all potential devices (it needs to be visible regardless of the device used, or platform such as website or app etc.);
 - d) if influencers use a lot of hashtags/mentions at the end their content, then the disclosure should always be **prior** to those hashtags/mentions;
 - e) disclosures should be clear, unambiguous, simple, straightforward, and accurately describe the relationship – avoid industry-specific terms and jargon. Examples include: #ad, #advertisement #sponsored, #AdvertisementFeature #[Brand]Employee, #paid, #[Brand]Ambassador, #[Brand]_Partner or “I received a free product from [Brand].”

- f) avoid disclosures that are vague or unclear, including: #sp, #spon, #collab, "Thanks [Brand]," #partner, or #ambassador. #PR, #PRHaul, #brand. Tagging or mentioning a brand without disclosing the Influencer's connection to the brand is also **NOT** sufficient.
- g) if disclosures are buried in a hashtag list; or are in overlays that are too small or faint, they could be considered hidden (such as "#poollife #floaties #sunshine #summerfun #pinacolada #ad #malibu #livingthedream #sundayfunday) or combined with other words (e.g., "#SippinInStyleAd").
- h) disclosures must not combine a company name "ad" such as "Cool Styllle" with "ad" at the end of a hashtag to make "#coolstyllead".
- i) for visual content, both traditional and "live" (for example YouTube, Instagram Stories, and reels, TikTok, X), include appropriate text disclosures in readable font size. Videos should include a verbal disclosure (presented at an adequate volume) at the start and end of the video and superimposed text disclosures in a manner that is easily visible to the viewer.
- j) for image-only platforms that do not use captions (such as live videos), superimpose text disclosures over images/videos.
- k) disclosure must be legible;
- l) disclosures should be in the same language as the endorsement itself. For example, if the content is in English, disclosures should be made in English.
- m) disclosures need to be in a colour that contrasts with the background to emphasise the text of the disclosure.
- n) a virtual influencer must additionally disclose to consumers that they are not interacting with a real human being. This disclosure must be upfront and prominent.
- o) disclosure features on social networks should be used together with other disclosure best practices.

Monitoring

10. Influencer posts must be monitored for compliance and fixed or removed within 72 hours if they are not compliant. If the influencer does not comply the relationship will be reassessed and could be terminated.

11. USER GENERATED CONTENT (UGC)

1. UGC posted on brand-owned and/or controlled digital platforms should be moderated on a regular basis so as to comply with the Guidelines.
2. Brand-owned and/or controlled digital platforms should include community guidelines stating their UGC policy, which may be included in the RDM.

12. FORWARD ADVANCE NOTICE (FAN)

Any material designed for sharing or downloading must include a clear warning that it should not be shared with anyone under the LPA by including the FAN in the ABOUT section to cover all content on the brand-owned platform.

(Example: "Please only share our posts with those who are legal drinking age").

13. PRIVACY POLICY

Brands must prioritize user privacy and ensure compliance with privacy policies governing the collection of personal information in accordance with the Personal Data Protection Act 2010.

14. COMPLIANCE

In the spirit of self-regulation, brands are encouraged to ensure that external consultants, such as public relations, marketing and advertising agencies, and third-party distributors engaged in the company's marketing efforts (including but not limited to digital), are familiar with the principles and provisions set forth in this Guideline.

15. DETAILED GUIDELINES FOR SOME SPECIFIC COMMUNICATION VEHICLES

Applications (e.g., iPhone, Android etc.)

1. Where there is an age requirement included in the service (e.g., iTunes has a more than 17 years old) the application must only be available to 21 years old or closest to that. If there is no age requirement specified by the service or it is below 21

years old then there must be an additional notice stating that the application should only be downloaded by those aged 21 years or over.

2. If the service can prevent website users who do not meet the age criteria from downloading the application, then this should be enacted.
3. Applications must have an Age Affirmation Page (AAP) in the app itself that shows the first time it is used. It does not need to be repeated each time the app is used.
4. Applications must have a RDM visible on the Welcome screen or the Home Screen.

Blogs

5. All brand blogs should be located on a site/platform that has an AAP.
6. Brand or its agents should only make comments on blogs where there is a reasonable expectation that at least 70% of the audience is aged over LPA.
7. All brand blogs should carry a RDM within the blog introduction.

Bluetooth and similar near field technologies

8. Bluetooth messaging or similar near fields technologies should link directly to an AAP unless it is being only used in areas where the audience is restricted to those of LPA (e.g., Private events, Clubs, and bars).

Instant Messaging

9. Brand and its agents may only Instant message recipients who are registered website users of a specific club or group (e.g., Glenlivet guardians) and have already affirmed their age as a part of that registration and consented to receiving such communications.

Advertising on Mobile devices

10. Third party mobile sites which are used for advertising must meet the 70% rule. Marketing material (e.g., sweepstakes) which is accessed via a mobile phone must carry an AAP.
11. Direct messaging to mobile devices may only be undertaken to recipients who have confirmed that they are over LPA (for example they may be part of a registered club) and consented to receiving such communications. Phone (device)

registration data alone is not considered acceptable as in many cases a minor's phone is registered to their parent.

Gaming

12. Advertising within third party games can only be run if the audience to the game can reasonably be shown to be within the 70% rule or sales of the game are restricted to over LPA.
13. "Advergaming" are permissible, but the distribution of these games must be through websites that have AAPs, and they must also contain a warning that they are intended only for those of LPA or above.

Podcasts

14. Podcasts should carry a download advice notice and only be located on sites which have an AAP.

QR Codes

15. Quick response codes are two-dimensional bar codes that when scanned or photographed link to a particular website.
16. Unless they are situated in age restricted areas (e.g., clubs or bars) or are accessed via an age affirmed website, wherever possible a QR code should link to material which carries an AAP.
17. QR codes should be accompanied by a notification that the content is intended for those over LPA only.

POS/Event based digital experiences

18. Should have AAP unless they are in an area that is restricted to LPA (e.g., Clubs or bars) or controlled by a person over LPA. If controlled by a person, they must ensure that anyone using the system is over the LPA.

Relationship Marketing

19. Relationship marketing can only be undertaken by registered website users who in registering have affirmed that they are over LPA.

RSS Feeds

20. Really Simple Syndication feeds allow content to be taken into the website users' aggregator (or reader). The link back to the content requires that the user goes through the original site's AAP (although the site may utilize "a remember me" feature).

Search Engine Marketing & optimization

21. Search Engine links (e.g., Keywords) must direct website users to the AAP of the appropriate website.

Wiki's (e.g., Wikipedia, Pbwiki)

22. Brand should only participate in Wiki's which meet the 70% rule.

X (formerly known as "Twitter")

23. Advertising on X is subject to the 70% rule.
24. Branded X Feeds should be age gated. This is possible using X Age Gate system (more info here: <https://help.twitter.com/en/safety-and-security/age-verification>)
25. Branded X feeds should carry a RDM within their introductions.
26. This should be in the same font, colour and size as the rest of the introductory text.
27. X Feeds must contain a notice on their home page saying that the content is only intended for viewing by those over the LPA in their country of residence or viewing (whichever is older).

Facebook

28. On Facebook pages, the RDM must be shown on the Cover photo. In addition, there must be a "Responsible Pact" tab (not necessarily named Pact that shall clearly relate to responsibility). This tab must be one of the first four tabs and therefore immediately visible on the page.
29. Facebook pages should be set up to only be available to anyone over the LPA. This can be achieved by selecting the "Intoxicating liquor Related" Age restriction in the Facebook page administration panel under the "Manage permissions"

category. The page must also be categorized in the “Wine/Spirits” category. Additionally, they should have a message on the page outlining that this page should not be read or accessed by anyone under LPA. (Technically this should not be necessary as the page will only be visible to Facebook website users over the appropriate age; however, the message will make it clear to regulators that we are taking a responsible attitude to underage drinking).

Instagram

30. Official branded Instagram channels must use the age gate mechanism put in place in April 2015. Any linking from an Instagram account should be to a location that is age gated for intoxicating liquor-related content.
31. Additionally, branded Instagram pages should contain both a responsibility message and a note that material is intended for people over LPA.

Pinterest

32. Branded Pinterest channels do not require age gates but any links to intoxicating liquor related content must be age-gated.
33. Additionally, branded Pinterest pages should contain both a responsibility message and a note that material is intended for people over LPA.

YouTube (Vimeo, Hulu and other video sharing sites)

34. Brand and its agents should only upload material to sites which meet the 70% rule.
35. Wherever possible branded video channels should be age gated or restricted to registered viewers of LPA.
36. YouTube Age Gating Guide:
<https://support.google.com/youtube/answer/2950063?hl=en>
37. All branded video channels should contain a responsibility message within their introduction of the same font colour and size as the rest of the introductory text.
38. If a part of your video is used as an advertising campaign and displayed as a teaser (meaning less than 15 seconds of viewing), you may display the RDM in a ticker field at the bottom of the screen during the 15 seconds. It means you can display your full content during 15 seconds for this advertising.