



LASSONDE POLICY

Sales and customer relationships

TITLE	Responsible Marketing Policy
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WRITTEN BY	Chief Legal Officer and Secretary
APPROVED BY	Governance and Ethics Committee
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1. POLICY OBJECTIVE

This Policy is intended primarily to identify and establish general guidelines applicable to Marketing materials (as defined in Section 7 below) of Lassonde Industries Inc., its subsidiaries and divisions (collectively "**Lassonde**"). They are designed to align with international standards for general marketing, for responsible food and beverage marketing communications and for responsible alcohol marketing communications¹.

In addition to comply with these guidelines, all Lassonde's Marketing materials must comply with applicable laws, rules, and regulations (the "**Legislation**") in all jurisdictions where Lassonde conducts business. In the event of a conflict between these guidelines and the Legislation, (i.e. if the guidelines are less stringent than the Legislation, the Legislation prevails).

2. SCOPE

This policy governs all advertisement and marketing communications.

3. POLICY STATEMENT

GENERAL PROVISIONS ON ADVERTISING AND MARKETING COMMUNICATIONS

1. Basic principles

- 1.1. All Marketing materials should be legal, decent, honest, and truthful.
 - Nutritional information and claims about nutrition and health benefits should have a sound scientific basis; and
 - Claims should be conveyed consistent with the nature and scope of measurable and verifiable facts, providing the consumer with clear and supportable information.

¹ These guidelines are largely based on the latest version of the "Advertising and Marketing Communication Code", the "Framework for Responsible Food and Beverage Marketing communications" and the "Framework for Responsible Marketing communications of Alcohol" of the International Chamber of Commerce (ICC).



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- 1.2. All Marketing materials should conform to the principles of fair competition, as provided in Lassonde's "**Competition and Antitrust Law Compliance Manual**", Section 4 (f) "False and misleading advertising".
- 1.3. All Marketing materials should be prepared with a due sense of social responsibility.
 - We should not undermine the importance of healthy lifestyles and must not encourage or tolerate excessive consumption.
- 1.4. No Marketing materials should be such as to impair public confidence in marketing.
 - We must respect the spirit of local and sectoral self-regulatory codes, in order to maintain confidence both in Marketing materials and in the self-regulation system.

2. Social Responsibility

- We must respect human dignity and should not incite or condone any form of discrimination, including that based upon ethnic or national origin, religion, gender, age, disability or sexual orientation;
- We should not without justifiable reason play on fear or exploit misfortune or suffering;
- We should not appear to condone or incite violent, unlawful, or anti-social behavior; and
- We should not play on superstition.

3. Decency

- 3.1. Marketing materials should not contain statements or audio or visual treatments which offend standards of decency currently prevailing in the country and culture concerned.
 - We should not use themes, images, symbols or representations that could be perceived as insulting, degrading or humiliating; and
 - If it is to be used in more than one country or region, the cultural and religious sensitivities of all countries and regions involved must be respected.

4. Honesty

- 4.1. Marketing materials should be so framed as not to abuse the trust of consumers or exploit their lack of experience or knowledge.
- 4.2. Where claims or terminology used might reasonably be interpreted by a consumer as health or nutrition claims, they should be supportable with appropriate scientific evidence.



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5. Truthfulness

- 5.1. Marketing materials should be truthful and not misleading.
- 5.2. It should not contain any statement, claim or audio or visual treatment which, directly or by implication, omission, ambiguity or exaggeration, is likely to mislead the consumer, in particular, but not exclusively, with regard to:
 - characteristics of the product which are material, (i.e. likely to influence the consumer's choice, such as: nature, composition, method and date of manufacture, range of use, efficiency and performance, quantity, commercial or geographical origin or environmental impact);
 - the value of the product and the total price to be paid by the consumer;
 - copyright and industrial property rights such as patents, trademarks, designs and models and trade names;
 - compliance with standards;
 - official recognition or approval, awards such as medals, prizes and diplomas; and
 - the extent of benefits for charitable causes.
- 5.3. Copy, sound and visual presentations should accurately represent the material characteristics of the product featured, such as taste, size, content nutrition or health benefits, and should not mislead consumers concerning any of those characteristics.
- 5.4. Food products not intended to be substitutes for meals should not be represented as such.

6. Substantiation

Descriptions, claims or illustrations relating to verifiable facts in Marketing materials should be capable of substantiation. Such substantiation should be available so that evidence can be produced without delay and upon request to the self-regulatory organizations responsible for the implementation of the Laws and Regulations.

7. Identification and Transparency

- 7.1. Marketing materials should be clearly distinguishable as such, whatever their form and whatever the medium used. When an advertisement, including so-called “native advertising”, appears in a medium containing news or editorial matter, it should be so presented that it is readily recognizable as an advertisement and where appropriate, labelled as such.
- 7.2. The true commercial purpose should be transparent and not misrepresent their true commercial purpose. Hence, a communication promoting the sale of a product should not be disguised as, for



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example, market research, consumer surveys, user-generated content, private blogs, private postings on social media or independent reviews.

8. Identification of Lassonde

We must be transparent and, where appropriate, include contact information to enable the consumer to get in touch with us without difficulty.

* The above does not apply to communications with the sole purpose of attracting attention to communication activities to follow (e.g. so-called “teaser advertisements”).

9. Use of technical/scientific data

9.1. Marketing materials should not:

- misuse technical data, (e.g. research results or quotations from technical and scientific publications);
- present statistics in such a way as to exaggerate the validity of a product claim; and/or
- use scientific terminology or vocabulary in such a way as falsely to suggest that a product claim has scientific validity.

9.2. All nutritional and health-benefit information and claims for food and beverage products should have a sound scientific basis.

9.3. Consumer taste or preference tests should not be used in a way that might imply statistical validity if there is none.

9.4. Testimonials should be based on well accepted and recognized opinion from experts.

10. Use of “Free” and “Guarantee”

10.1. The term “free”, (e.g. “free gift” or “free offer”), should be used only:

- where the offer involves no obligation whatsoever, or
- in conjunction with the purchase of another product, provided the price of that product has not been increased to cover all or part of the cost of the offer.

10.2. It should not state or imply that a “guarantee”, “warranty” or other expression having substantially the same meaning, offers the consumer rights additional to those provided by law when it does not. The terms of any guarantee or warranty, including the name and address of the guarantor, should be easily available to the consumer and limitations on consumer rights or remedies, where permitted by law, should be clear and conspicuous.



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11. Comparisons

Marketing materials containing comparisons should be so designed that the comparison is not likely to mislead and should comply with the principles of fair competition. Points of comparison should be based on facts which can be substantiated and should not be unfairly selected².

12. Denigration

Marketing materials should not denigrate any person or group of persons, firm, organization, industrial or commercial activity, profession, or product, or seek to bring it or them into public contempt or ridicule.

13. Testimonials

Marketing materials should not contain or refer to any testimonial, endorsement or supportive documentation unless it is genuine, verifiable and relevant. Testimonials or endorsements which have become obsolete or misleading through passage of time should not be used. The sponsored nature of an endorsement or testimonial should be made clear through an appropriate disclosure if the form and format of the communication would not otherwise be understood to constitute a sponsored message.

14. Portrayal or imitation of persons and references to personal property

Marketing materials should not portray or refer to any persons, whether in a private or a public capacity, unless prior permission has been obtained; nor should Marketing materials without prior permission depict or refer to any person's property in a way likely to convey the impression of a personal endorsement of the product or organization involved³.

15. Exploitation of Goodwill

Marketing materials should not make unjustifiable use of the name, initials, logo and/or trademarks of another firm, company or institution. It should not in any way take undue advantage of another firm's, individual's or institution's goodwill in its name, brands or other intellectual property, or take advantage of the goodwill earned by other marketing campaigns without prior consent⁴.

16. Imitation

16.1. Marketing materials should not imitate those of another marketer in any way likely to mislead or confuse the consumer, for example through the general layout, text, slogan, visual treatment, music or sound effects.

16.2. Where a marketer has established a distinctive Marketing materials campaign in one or more countries, we should not imitate that campaign in other countries where the marketer who

² For more details, please refer yourself to Section 4 (f) "False and Misleading Advertising" of our Competition and Antitrust Law Compliance Manual.

³ For more details, please refer yourself to Section 4.2.2 "Project Involving IP and Third Parties" of our Intellectual Property Policy.

⁴ Ibid, Section 4.2.5 "Third Party IP Rights".



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originated the campaign may operate, thereby preventing the extension of the campaign to those countries within a reasonable period.

17. Safety and Health

17.1. Marketing materials should not, without justification on educational or social grounds, contain any visual portrayal or any description of potentially dangerous practices, or situations which show a disregard for safety or health, as defined by local national standards. Instructions for use should include appropriate safety warnings and, where necessary, disclaimers.

17.2. Children should be shown to be under adult supervision whenever a product or an activity involves a safety risk.

RESPECT FOR SELF-REGULATORY DECISIONS

- Lassonde must ensure that Marketing materials adhere to applicable Laws, regulations and the decisions thereon by self-regulatory organizations.
- Lassonde must ensure that all those involved in the company's Marketing materials activities are aware of the rules and implications of the Marketing materials policy.
- Lassonde must ensure contracts reflect this responsibility.

ADVERTISING AND MARKETING MATERIALS FOR CHILDREN AND TEENS

Special care should be taken in Marketing materials directed to or featuring children or teens, in jurisdictions where such Marketing materials are restricted by the Legislation (e.g. province of Quebec).

- Such communications should not undermine positive social behavior, lifestyles and attitudes;
- Products which are illegal for children or teens to purchase or are unsuitable for them should not be advertised in media targeted to them;
- When directed to children or teens, it should not be inserted in media where the editorial matter is unsuitable for them; and
- When directed towards children or teens, it should not create a sense of urgency, or inappropriate price minimization.

While fantasy, including animation, is appropriate in communication with younger as well as older children, care should be taken not to exploit a child's imagination in a way that could mislead him/her about the nutritional benefits of the product involved.



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1. Inexperience and Credulity

- Marketing materials should not exploit inexperience or credulity of children, like exaggerate the true size, value, nature, durability and performance of the product.
- Sales promotions should be presented in such a way as to ensure that consumers are made aware, before making a purchase, of any conditions likely to affect their decision to purchase.

2. Avoidance of harm

- Marketing materials should not contain any statement or visual treatment that could have the effect of harming children or young people mentally, morally or physically.
- Children and teens should not be portrayed in unsafe situations or engaging in actions harmful to themselves or others or be encouraged to engage in potentially hazardous activities or inappropriate behavior considering the expected physical and mental capabilities of the target demographic.

3. Social Values

- Marketing materials should not suggest that possession or use of the promoted product will give a child or teen physical, psychological, or social advantages over other children or teens, or that not possessing the product will have the opposite effect.
- It should not undermine the authority, responsibility, judgement, or tastes of parents, having regard to relevant social and cultural values.
- It should not include any direct appeal to children to persuade their parents or other adults to buy products for them.

4. Prohibited Product

- A product that is not suitable for children or teens cannot be advertised in a media directed at them.

APPLICATION TO MARKETING MATERIALS OF ALCOHOL

1. Basic principles

- As an overriding principle, all Marketing materials of alcohol should be so designed to market products to persons of legal purchase age in a responsible and appropriate manner.
- Marketing materials should not incite or condone illegal behavior, excessive consumption or undermine healthy lifestyles.



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- Marketing materials should respect the spirit of ICC, local and sectoral self-regulatory codes, in order to maintain confidence both in Marketing materials and in the self-regulation system.

2. Social Responsibility

- Marketing materials should portray alcohol products and drinkers in a responsible manner. Alcohol products and drinkers may be portrayed as part of responsible social experiences and activities.
- Marketing materials should not depict situations where alcohol is being consumed excessively or in an irresponsible manner. Persons should not be portrayed in a state of intoxication or in any way that suggests it is socially acceptable conduct nor should they promote the intoxicating effect of alcohol consumption. This includes using intoxication as a subject for amusement.
- Marketing materials should not contain claims or representations that suggest individuals can attain social, professional, educational, or athletic success or status because of alcohol consumption.
- Marketing materials should avoid portraying abstinence or moderate consumption in a negative way and implying those who do not drink are at a disadvantage to those who drink.
- Marketing materials should not present the consumption of alcohol as a means of removing social or sexual inhibitions, achieving sexual success, or making an individual more sexually attractive.
- Sexualized or otherwise indecent images should not be used; particular care should be taken about nudity.
- Marketing materials should not be associated with violent, aggressive, hazardous, illegal or anti-social behavior; they should not be associated with illegal activity of any kind or make reference to drugs or the drug culture.
- The consumption of alcohol should not be associated with abusive or violent relationships or situations.
- Marketing materials should not depict alcohol consumption in a manner associated with the attainment of adulthood or the “rite of passage” to adulthood.

3. Decency

- Marketing materials should not use themes, images, symbols or portrayals likely to be offensive, derogatory or demeaning.
- If a Marketing material is to be used in more than one country, the cultural and religious sensitivities of all the countries involved should be respected.



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4. Honesty

- Alcohol Marketing materials should not mislead consumers or create confusion about the nature (i.e. whether it is an alcoholic or non-alcoholic beverage) or the strength of an alcoholic beverage.

5. Safety and Health

- Marketing materials should portray and reflect moderate and responsible consumption by individuals of legal purchase age. 'Moderate and responsible' refers both to the amount of alcohol consumed and to the way in which it is consumed.
- Sales promotions should not encourage excessive or irresponsible consumption.
- Marketing materials that refer to the alcohol content of a product should do so in a straightforward and factual manner and not present higher alcohol strength as a principal basis for appeal.
- Marketing materials may provide facts about product contents, including calories, but should not suggest that alcohol can prevent, treat or cure illness or that alcohol offers a remedy for personal problems such as loneliness, stress or boredom. Consequently, Marketing materials should not link such information to any health, fitness or weight-control claims except as a relevant and truthful reference to official guidelines or recommendations, or as otherwise permitted by law.
- Marketing materials of alcohol should not depict or be addressed to at-risk groups, e.g. pregnant women.
- Marketing materials should not portray people in situations or activities in which drinking would be unsafe. Consequently, they should not portray alcohol being consumed by a person who is engaged in, or is immediately about to engage in, any activity that requires a high degree of alertness or physical coordination.
- In particular, Marketing materials should not portray, encourage, or condone driving any motorized form of transportation while intoxicated.

6. Children and teens

- Marketing materials should be intended for persons of legal purchase age.
- Marketing materials should not be intended to primarily appeal to minors (i.e. making it more attractive to minors than to persons of legal purchase age). Therefore, Marketing materials should avoid featuring settings, music, games, language, characters or personalities, for example, that are primarily appealing to minors. This does not preclude materials directed to a



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wider adult audience that may have incidental or unintended appeal to persons under legal purchase age.

- Marketing materials should not show minors (or people likely to be perceived as such) drinking alcohol.
- Promotions, prizes or games linked to marketing alcohol, including on digital media, should not be open to minors.
- Marketing materials of alcohol should be placed only in media where it is reasonably expected to meet applicable audience composition targets (i.e. where the audience composition can reasonably be expected to meet the agreed target of people that are not minors, those under legal purchase age as defined previously in this Framework).
- Alcohol company-controlled websites marketing alcohol should include age affirmation mechanisms, using reasonably available technology intended to limit access by minors.

7. Respect for self-regulatory decisions

- Alcohol companies should ensure that Marketing materials adhere to applicable rules and the decisions thereon by self-regulatory organizations. Companies should ensure that all those involved in a company's Marketing materials activities are aware of the rules and implications of the Marketing materials code. They should ensure contracts reflect this responsibility.

4. TARGET AUDIENCE

Employees of Lassonde Inc and its subsidiaries

5. NON COMPLIANCE / DISCIPLINARY ACTION

Employees that go against the principles set out in this policy could be subject to disciplinary measures that could go as far as dismissal. The Company may also take legal action against any party acting against the principles set out in this policy.

6. SUPPORT DOCUMENTATION AND REPORT

Not applicable.

7. GLOSSARY

MARKETING COMMUNICATIONS DEFINITION

For the purposes of this Policy, the term “**Marketing materials**” means any communication, material or documentation, in any form whatsoever, intended to promote Lassonde's products, whether written, printed, online, audio or visual. This term also includes advertising as well as other techniques, such as promotions, sponsorships as well as customer relationship management and digital marketing communications, and should be interpreted broadly to mean any communications produced directly by or on behalf of marketers intended primarily to promote products or to influence consumer behavior.