



CODICE RUFFINO PER LE PRATICHE RESPONSABILI SULLA
PUBBLICITÀ E SUL MARKETING DELLE BEVANDE ALCOLICHE

RUFFINO

INTRODUCTION

- INTRODUCTION 3
- SCOPE 4
- RESPONSIBLE PLACEMENT 5
 - Adult/Underage consumers 5
- RESPONSIBLE CONTENT 6
 - Adult/Underage consumers 6
 - Websites 7
 - Social responsibility 7
 - Decency 8
 - Sexual behavior and performances 8
 - Promotional events 8
 - Product Placement 9
 - Alcohol content 9
 - Social responsibility statement 9
- MANDATORY INTERNAL COMPLIANCE PROCESS 11

INTRODUCTION

Ruffino S.r.l. (“*Ruffino*” or “*La società*”) is a leading wine company, globally renowned for its wide range of premium wines. These products are sold all over the world. When it comes to celebrating a special occasion, enjoying a family meal or spending an evening with friends, several people all over the world choose Ruffino’s products, reflecting the aim spread by Constellation Brands group, Inc. to which it belongs, “*Elevate Life With Every Glass Raised*”.

Since this is a code shared by a group, its rules are applicable to both Ruffino S.r.l and its controlled company Tenimenti Ruffino S.r.l.

Considering that Ruffino really concerns about social responsibility, it has developed this Code for the Responsible Practices for Alcoholic Beverages Advertising and Marketing (the “Code”), in order to provide a directive for its employees, agencies and affiliated companies involved in the promotion of its trademarks, wherever they are sold.

Ruffino adopts this Code to protect the primary interest of people, and in particular of children and adolescents, as well as to keep the family, social and working life safe from the consequences of the abuse of alcoholic beverages. Therefore it strictly adheres to the provisions of the Italian law in terms of the consumption of alcoholic beverages and, in particular, to the provisions of Law n. 125 of March 30, 2001 (Framework law regarding alcohol and alcohol-related problems) and the IAP Code of Marketing Communication Self-Regulation.

Considering that a single global code cannot include all the regulations, business policies and specific standards of each country’s market, this Code is intended to provide the basic structure for the responsible promotion of the brand, including marketing and advertising activities on behalf of Ruffino, importers, agents and distributors. Therefore, it is possible to introduce some integrations to ensure completeness with respect to the specific laws and customs of a particular country.

However, these changes will be an addition and not a replacement of the standards already stated in this Code.

The company is committed to providing a responsible and targeted placement of the communication content of the brand. The inalienable values of this Code have been established in order to ensure that Ruffino’s products are distributed on the market in a responsible and appropriate way to consumers above the legal purchase age, as envisaged by law. With this aim, Ruffino will develop its advertising and marketing strategies in accordance with the regulations expressed both in the spirit and in the intent of this Code.

The consumption of alcoholic beverages plays an important role recognized in cultural, religious and social traditions, both in past and modern society. Ruffino is particularly proud to promote its products to an adult audience who can choose what to drink.

Ruffino encourages every responsible decision making regarding drinking or not drinking by adult consumers, and discourages the abuse and the illegal consumption of its products. Therefore, the company urges the adults who drink alcoholic beverages to do so in moderation. However, the consumer who chooses to drink has a responsibility to do so in a moderate manner.

As a global company that produces alcoholic beverages, Ruffino plays an active role in several markets and industrial organizations. In fact, Ruffino cooperates with its partners and customers to ensure that activities relating to social responsibility, including business codes, remain a priority and help address the misuse and illegal consumption of alcoholic beverages in a positive way. The compliance with this Code is mandatory for the Ruffino group and its rules must be considered and shared as part of the approval process for any advertising, promotional and marketing activity.

This Code anticipates the possible updates in order to reflect the constant improvements in terms of social responsibility and compliance with the law.

SCOPE

This Code applies to all the activities undertaken to advertise and promote Ruffino's products worldwide. The "Advertising and Promotion" definition includes all the brand advertising campaigns as well as the communications to the customers, market advertising, promotional events, packaging, labels, sales materials and the "product placement".

The rules contained in this Code shall apply to any means of communication, both in electronic and paper format, along with any online media, or web-based material or digital communication used to advertise alcoholic beverages on the market. These rules shall also apply to any type of activity or promotional event or marketing strategies, including the product placement (for example, in movies, television programs, music videos, videos or online games) and sponsorships.

The company is aware that it is very difficult to cover every eventuality, but it is committed to complying with the spirit and the intent of this Code. Any questions about the interpretation of this Code, Ruffino's compliance with this Code, or the enforcement of the regulations set forth in this Code shall be reported to Ruffino's legal compliance office

RESPONSIBLE PLACEMENT

ADULT/UNDERAGE CONSUMERS

1. Alcohol advertising and marketing materials are addressed to adults who can legally buy alcohol and freely choose to drink.
2. Alcoholic beverages should not be advertised or sold in any direct way, or made primarily appealing to people who are below the legal purchase age (the definition of “primarily appealing” is established in section 3 of the following “Responsible content” section).
3. Alcohol advertising and marketing materials should be placed in television and radio programs, printed materials as well as Internet and digital communications only when at least 71.6% (or more, according to the standards in force in the country where the advertising and marketing materials are placed) of the audience is reasonably expected to be above the legal purchase age, based on the updated and reliable data on the targeted consumers. All the above-mentioned points are subject to the provisions of the art. 13 of the Italian law no. 125 of March 30, 2001 on the protection of children, which prohibits the advertisement of alcoholic beverages during programs intended for children and for fifteen minutes before and after them.
 - To promote the placement policy, a series of recognized media should be examined regularly (at least annually) in order to ensure that the data concerning the composition of the audience are always updated and appropriate.
 - Periodic audits of a sample of past placements should be carried out in order to check that they are compliant with the Code and evaluate the necessity to take appropriate corrective actions.
 - Detailed population data/guidelines have been developed to implement the responsible placement provisions set forth in this Code and are issued and regularly reviewed to reflect the most updated and appropriate procedures.
4. The most appropriate measures are taken and a strong commitment is made in order to prevent the placement of alcohol advertising during those events when 71.6% of the audience (or more, according to the standards of the country of reference) is certainly below the legal purchase age.
5. Alcohol advertising and marketing materials can be placed in locations primarily intended to adult-oriented events, defined as where at least 71.6 % (or more, according to the standards of the country of reference) of the audience attending those events is reasonably expected to be above the legal purchase age.
6. Alcoholic beverages should not be advertised and promoted in newspapers, at schools and universities, as well as at colleges and university campuses with the exception of authorized retailers operating inside the above-mentioned campuses.
7. According to Ruffino, the promotion of alcoholic beverages should not involve retailers operating at or on behalf of schools or universities, except for specific requests due to educational and prevention purposes in compliance with the regulations in force.
8. Direct or indirect alcohol advertising is prohibited in places mainly attended by people below the legal purchase age (namely, children under 18 years of age in Italy).

RESPONSIBLE CONTENT

ADULT/UNDERAGE CONSUMERS

1. Alcohol advertising and marketing materials should be addressed to adults who can legally buy alcohol and freely choose what to drink. Alcohol advertising and marketing materials should comply with all the aspects of the Code, irrespective of the placement of these materials; for example, the nature or subject matter of a publication is not relevant.
2. The content of alcohol advertising should not be appealing to children.
3. Alcohol advertising and marketing materials should not depict children (except if the depiction is merely incidental to the focus of such materials with no implication that the child is a consumer) or show any objects, pictures, or cartoons that may primarily appeal to children. Advertising or marketing material is considered to “primarily appeal” to people below the legal purchase age if it has special attractiveness to such people beyond the general attractiveness it has for those above the legal purchase age
4. Alcohol advertising should not use marks, pictures, characters and people, directly and primarily related to children, which could generate a direct interest on them.
5. Alcoholic beverages should not be advertised or marketed in comic strips issued in newspapers, magazines or other publications.
6. Alcoholic beverages should not be advertised or marketed in a manner associated with the attainment of adulthood or as a “rite of passage” to adulthood.
7. Alcoholic beverages should not be advertised by any person below the legal purchase age or appears to be below the legal purchase age. To help ensure that people who advertise alcohol are, or seem to be above the legal purchase age, the models and actors chosen for the advertising campaigns should be a minimum of the applicable legal purchase age in their country plus four years (for example, in Italy the legal purchase age is 18, so the models or actors involved should be at least 22 years old), according to appropriate identification, and should reasonably appear at least as old as the applicable legal purchase age in the country of reference.
8. No brand identification, including logos, trademarks or names should be used and licensed to be used on clothes, toys, games or game equipment, or any other object that is primarily used by people below the legal purchase age.
9. The manufacture of clothing depicting the brand logos and the license to depict them on clothes should be limited to the sizes intended for adults.

WEBSITES

10. Internet websites containing alcohol advertising should adopt a company-controlled age authentication system. They also should contain a reminder of the pertinent legal purchase age, or a reference to a website to confirm the applicable legal purchase age in the website visitor's country.
11. Constellation Brands acknowledges the crucial role that parents play in teaching their children how to consume alcoholic beverages in a legal and responsible way. To help parents who wish to prevent their children from accessing to Internet websites without their supervision, the same group will provide, upon request, these parents and software developers with its e-mail address of each company, thus allowing this information to be used.
12. Each website developed by Ruffino containing alcohol advertising or marketing materials should feature, where possible, a link to a website that promotes the responsible consumption of alcoholic beverages.
13. Ruffino's websites containing downloadable advertising or marketing contents should include precise instructions for those who want to download this material, in order to prevent the transmission of these contents to children. The downloadable material itself, where possible, should also include warnings on responsible drinking.

SOCIAL RESPONSIBILITY

14. Alcohol advertising and marketing materials should portray the consumption of alcoholic beverages as well as drinkers in a responsible manner. Alcoholic beverages and consumers should be depicted as part of social experiences and responsible people. The activities outlined in these contents should show plausible people in a decent and plain context.
15. Alcohol advertising and marketing materials should not foster an excessive and unrestrained, and therefore harmful, consumption of alcoholic beverages. These materials should not portray drunk people or indicate in any way that a state of drunkenness is socially acceptable, or promote the effects of drunkenness as a result of an excessive alcohol consumption.
16. Alcohol advertising and marketing materials should not show non-drinkers in a negative way or imply that they enjoy life less than those who drink. Therefore, they should not express moderation and alcohol abstinence as negative values.
17. Alcohol advertising and marketing materials should not transmit any curative, therapeutic, nutritional and health claim, unless it is permitted by law. Therefore, they should not represent any unhealthy attachment to the product and, in general, any addiction to alcohol or indicate that the use of alcohol can solve personal problems.
18. Alcohol advertising and marketing materials should contain no claim that people's social, professional, educational and athletic success is due to the consumption of alcoholic beverages. Therefore, they should not imply that alcohol abstinence may lead to a condition of physical, psychological or social inferiority.
19. Alcoholic products should not be advertised or marketed in any way in relation to violent situations.
20. Alcohol advertising and marketing materials should not imply any kind of illegal activities.
21. Alcohol advertising and marketing materials should not promote the consumption of alcoholic beverages by people involved or about to be involved in activities that require a high degree of attention and physical coordination.
22. Alcohol advertising and marketing materials should not be associated with antisocial and dangerous behavior.
23. Driving under the influence of alcohol is prohibited by law in many countries. Alcohol advertising and marketing materials should not show, promote or justify the decision to drive while intoxicated.

DECENCY

24. Ruffino's brands are sold in many countries all over the world. Considering the cultural aspects characterizing each country, it is difficult to develop a comprehensive definition for alcohol advertising and marketing materials. Taking that into account, marketing managers and agencies acting on behalf of the company are aware of these circumstances and ensure that Ruffino's marketing communications both on a global and local scale do not contain any images, symbols, or pictures that may be considered offensive or show any discrimination of gender, race, religion, culture or minority groups.
25. Alcohol advertising and marketing materials should reflect recognized and contemporary standards of decency.
26. Alcohol advertising and marketing materials should not degrade the image, body or status of women, and men, belonging to any ethnicity, minority group, sexual orientation, religion, or any another group.
27. Alcohol advertising and marketing materials should not contain any vulgarity or indecent language or images.
28. Alcohol advertising and marketing materials should not involve religious themes.

SEXUAL BEHAVIOR AND PERFORMANCES

29. Alcohol advertising and marketing materials may show affection or loving attitude in association with values such as friendship and conviviality. The preference for a brand can be based on values such as taste and awareness, while alcohol advertising and marketing materials should never assume that the consumption of alcoholic beverages may contribute to awareness and enhance physical and sexual performances. Therefore, such advertising and marketing materials should not show any nakedness, explicit sexual activity, sexual promiscuity and vulgarity or indecent images and language.

PROMOTIONAL EVENTS

30. Internal promotions sponsored by Ruffino should encourage responsible consumption by the adults who choose to drink and discourage the activities, including drinking games, that reward or encourage excessive/abusive consumption.
31. During tasting sessions, Ruffino must ensure that appropriate measures are taken to protect children, including making sure that the staff leading these sessions on behalf of Ruffino is made of adults.
32. The company should not promote or encourage any drinking in conjunction with reckless and/or irresponsible behavior at any promotion sponsored or participated in by Ruffino.
33. Alcohol advertising and marketing materials should not use the term, or sponsor events or activities that use the term "school vacations" in reference to children.

PRODUCT PLACEMENT

34. Movies, television programs, music videos and video games can often portray the consumption of alcoholic beverages and related visibility/promotion materials. Therefore, Ruffino and the companies appointed by Ruffino to seek opportunities for product placement should adhere to the following principles:
- a. Assessment on a case-by-case basis: product placements should be approved or rejected on a case-by-case basis, based on the information on each film, television program, video game or music video available at the time in which the producers provide the project.
 - b. Representation of drinking and driving: driving while intoxicated is dangerous and is prohibited by law in many countries, therefore alcohol advertising and marketing materials should not portray, encourage or justify the decision to drive after the consumption of alcoholic beverages. Product placements where the protagonist drives while intoxicated and is involved in the irresponsible consumption of Ruffino's products cannot be approved.
 - c. Underage drinking: Ruffino takes a strong position against the consumption of alcoholic beverages below the legal age. Therefore, the company should not approve a product placement that involves the purchase or the consumption of Ruffino's products by children.
 - d. Primary appeal to children: product placements where the main theme, both for its content or presentation, is particularly appealing to children beyond the general attractiveness to people above the legal purchase age should not be approved.
 - e. Representation of alcoholism/alcohol abuse: product placements where the protagonist uses Ruffino's products in an irresponsible or illegal way, or where alcoholism is showed should not be approved, unless they foster a campaign in favor of responsible consumption.
 - f. Communications media subject to objective measurements: product placements should not be required or approved unless they are compliant with the provisions of the Code.

ALCOHOL CONTENT

35. Alcoholic advertising and marketing materials should not highlight the alcohol content as the main quality of a beverage. Moreover, they should not lead the audience to disregard the different patterns of consumption, which must be considered in relation to the characteristics of each product as well as the specific conditions of each consumer.

SOCIAL RESPONSIBILITY STATEMENT

36. Statements in favor of a responsible consumption should be included in alcohol advertising and marketing materials, as well as websites and promotional events, where practicable.

MANDATORY INTERNAL COMPLIANCE PROCESS

1. Ruffino established an internal process to ensure compliance with the Code. If you have any question relating to a particular campaign or marketing material, you can apply to the legal compliance office. This office must always be consulted in case of questions concerning the application of the Code.
2. In order to carry out marketing practices, Ruffino and all the companies appointed by Ruffino should adopt and enforce the provisions contained in this Code.
3. Ruffino will give a copy of this Code to all advertising agencies, media buyers and other external providers of advertising services, as well as to the consultants involved in advertising, marketing and promotional activities on behalf of Ruffino.
4. Any claim and dispute involving Ruffino's marketing and advertising initiatives should be reported immediately to the legal compliance office of Ruffino, which will assess the most suitable proceeding in consultation with the Legal Department of Constellation Brands, Inc.

DATE OF ADOPTION OF THE CODE: 15 MAY 2013



Tenimenti Ruffino s.r.l.
Via Poggio al Mandorlo, 1
50011 Quarate - Bagno a Ripoli (FI)
tel.: +39 055 6499711

Ruffino s.r.l.
Piazzale I.L. Ruffino, 1 - 50065 Pontassieve (FI)
tel. +39 055 83 605
info@ruffino.it - www.ruffino.it