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Whitbread Responsible Marketing & Advertising Policy

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Whitbread Policy
Responsible Marketing & Advertising

WHO THIS POLICY APPLIES TO:

- Whitbread Support Centre Teams
- Whitbread NSF Technical Team
- Whitbread Marketing Agencies

WHITBREAD INTENT

At Whitbread we always put our guests at the heart of all that we do, in line with our Force for Good programme.

We believe that all food and drink, in moderation, can be enjoyed as part of a healthy and balanced diet and active lifestyle. We are committed to providing our guests with inclusive choice and accurate nutrition information to help them make an informed choice when dining in a Whitbread Restaurant.

Our approach to responsible marketing and advertising is aligned to our 'Force For Good' targets:

"We will support the wellbeing of our guests and customers in a responsible and transparent way whilst maintaining great taste, quality and value for money for our guests"

SCOPE

This document outlines the Whitbread responsible marketing and advertising policy and procedures. It is applicable to all Whitbread menus and brands across food and beverages. It covers the legal guidelines and voluntary pledges in relation to marketing and advertising.

INTRODUCTION:

Whitbread is committed to responsibly marketing and advertising our brands, food, and drink so that our consumers can make informed choices.

To ensure that we have consistently high standards of marketing and communication across all our brands, Whitbread observes the following principles across all marketing channels including company campaigns, sponsorships and partnerships, in-house restaurant and store marketing, including menus and signage, packaging, websites, texts, emails and social media.

Whitbread also requires its external advertising and marketing agencies and suppliers to uphold these principles in all marketing materials relating to any such activity including creative design briefs, advertising proposals and briefs to sub-contractors.

MARKETING & ADVERTISING PRINCIPLES

- All our advertising will be truthful, accurate and well substantiated. All our communications will reflect fair practice, good taste, and the values of our corporate strategy.

- Our marketing practices will comply with:

    - All industry Codes of Practice including CAP, BCAP
    - Any sector-specific guidelines
    - Any self-regulatory commitments that Whitbread undertakes.

- Our marketing and advertising activities will never be discriminatory and will respect the ethics and values specific to our customers, particularly parents.

- We believe that consumers have a right to privacy and our marketing practice (including social marketing in digital media) will comply with all applicable laws, regulations and self-regulatory guidelines relating to privacy disclosures, permission marketing and collection and use of personally identifiable information.

- Our communication will reflect moderate consumption and portion sizes appropriate to the occasion. Our advertising will never promote or endorse excessive consumption using words like “supersize” or food challenges such as “Man vs Food” competitions.

- Any presentation of our food in our marketing and advertising will accurately represent all material characteristics advertised including taste, size, and content.

- All product content, comparative and nutrition and health claims will be accurate and appropriately substantiated and will be stated in accordance with the relevant laws, regulations, and Codes of Practice

MARKETING & ADVERTING TO CHILDREN

Whitbread is committed to the following principles:

- We will support the role of parents in guiding and deciding the most appropriate food and drink choice for their children.

- We will not use visuals, messages or language which encourage children to pester parents or others to buy products.

- We will ensure that any marketing, advertising, and communications does not:

    - Take advantage of children's natural sense of loyalty to brands or specific characters to promote HFSS (High in Fat, Salt and/or Sugar, as defined by the Government Nutrient Profiling Model used by OFCOM) foods or drinks.
    - Encourage excessive and/or frequent consumption of HFSS foods or drinks.
    - Encourage children to consume HFSS foods or drinks frequently throughout the day.
    - Suggest confectionery or less healthy snacks should replace whole balanced meals.
    - Imply children will be unpopular or disloyal if they don't buy a certain product.

- No advertising or marketing of HFSS products will be directly aimed at children under the age of 12 years. Only products which fulfil specific nutrition criteria, as defined in the Whitbread Children's Nutrition Standards, are included in our children's food and drink offering and therefore subsequent marketing and advertising.

- Licensed characters and endorsements of celebrities appealing to children below 12 years of age will not be used to advertise HFSS foods. Any use of such characters and/or celebrity endorsements will only be used to generically highlight children's menus and other healthier options.

BASIS OF GUIDELINES

The Whitbread marketing and advertising guidelines are based on UK advertising rules as follows:

- UK Code of Broadcast Advertising (BCAP)
- UK Code of Non-Broadcast Advertising, Sales Promotion and Direct Marketing (CAP Code
- The Consumer Protection from Unfair Trading Regulations (2008)

Should any amendments be made to UK regulations or best practice guidelines, the Whitbread Responsible Marketing & Adverting Policy will be updated accordingly.

IMPLEMENTATION & GOVERNANCE

All advertising and promotions will be reviewed at an early stage for the appropriateness of the activity and checked for compliance with these Guidelines before being signed off by the relevant responsible Brand Manager.

The Guidelines will be reviewed annually by by the company's Food Safety & Integrity Steering Board to ensure they comply with all Government advertising and marketing regulations and are aligned with advertising and marketing industry Codes of Practice.