



ITC LIMITED FOODS DIVISION'S MARKETING AND COMMUNICATION POLICY

PREFACE

Over the years, the Company's multiple drivers of growth have been carefully crafted to match internal competencies with the emerging opportunities of a growing Indian market, with the aim to develop a customer-focused, high performance organization which creates value for all its stakeholders. We are cognizant that the Company has been given to us in “trust” by all our stakeholders and we shall endeavor to deliver consumer expectations of value, quality and satisfaction. We aim to do so with a robust portfolio of businesses that leverage the Company's unique enterprise strengths including deep consumer insights, intimate rural linkages, superior Agri-sourcing, path-breaking R&D, world-class manufacturing, brand building skills, culinary insights of the Company's Hotels' chefs, innovative consumer packaging, focus on digital technologies, and an extensive trade marketing, distribution and logistics network. These unique strengths enable the Foods Division of ITC Limited to create a portfolio of winning businesses across all operating categories. Our vision to create a high-performance organization that benefits all is embodied by our credo of ‘Nation First – Sab Saath Badhein’.

With the changing health dynamics in the country and the associated regulatory requirements, it has become essential for every Food and Beverage manufacturer to endorse a responsible communication & marketing plan. We have always been one of the most responsible organisations in embracing & leading the change – in line with its commitment to the consumers, customers, society, country and the eco-system at large. We are committed to provide safe, nutritious and sensorially superior food products and we believe that it is our “shared responsibility” to help consumers make informed choices. We shall follow a three-pronged approach to carrying this commitment to our customers:

Research & unparalleled insight into the Indian consumer: We continue to invest in latest research to understand the changing nutritional needs and taste preferences of our consumers in context to the dynamic external ecosystem. We believe that being an Indian corporate, with deep understanding and roots in India, we are best suited to cater to the food needs of the aspiring Indian. Keeping with the evolving aspiration of the Indian consumer, new products are being developed and launched to meet both the taste and nutrition needs, along with the convenience expectations of our consumers.

Regulatory compliance in product development & communication: We always comply with self-regulatory codes like the Advertising Standards Council of India's Code for Self-Regulation in Advertising and laws like the Food Safety & Standards Act, 2006, Consumer Protection Act, 2019, as may be applicable at various levels of operations and they also guide us in making the most appropriate and responsible decisions, keeping the consumers' interest at its core, both at the brand and corporate levels.

Responsible marketing communication: We are equally aware of the responsibility that it brings when we communicate with our consumers via various communication touch points across different media. Our consumer communication and marketing policy aims to define the principles on which all its communication initiatives and activities will be based and in full compliance of.

POLICY SCOPE

These principles are applicable only to the ITC's Foods Division Marketing, Communications and activities across various channels & touchpoints like digital, print, broadcast, non-broadcast electronic, digital, in-store, point of sales marketing including packaging and other additional forms of marketing.

GENERAL COMMUNICATION PRINCIPLES

1. We believe that transparent, ethical and responsible communication drives consumer awareness and is key to develop trust, consumer behaviour and choice for its world-class brands.
2. We shall ensure that all product labelling, claims and communications follow the applicable laws of the land.
3. We shall not undermine the concept of a diversified balanced healthy diet and will showcase products in suitable portion sizes in appropriate context.
4. We continue to adopt self-regulation on responsible communication and marketing besides adhering to the Code for Self-Regulation in Advertising prescribed by the Advertising Standards Council of India.
5. We strive to ensure that all representations including text, sound, and visual accurately represent the product, including taste and content.
6. We shall not represent food products that are not intended to be meal substitutes.
7. Nutrition & Health claims relating to products will have a scientific basis and will comply with all applicable laws and regulations.
8. All applicable nutrient content and claim information, to be backed with test reports by accredited laboratories and made in a way that accurately reflects the nutrition composition of the product and comply with applicable laws and regulations.
9. All sensory and consumer taste preference claims to be based on technically &/or scientifically validated methods.
10. Advertisements should not contain indecent, vulgar, especially in the depiction of women, or nothing repulsive which is likely, in light of general prevailing standards of decency and propriety, to cause grave and widespread offence.
11. Advertisements should not depict any content which is offensive to any religious, ethnic, and political groups as per generally accepted norms.
12. Advertising should not denigrate, attack, or discredit the product, or advertisements of competition directly or by implication.
13. All endorsements to be done in line with all applicable guidelines &/or laws with supporting documents.
14. Advertisements which may require an obvious exaggeration and/or hyperbolic treatment should be accompanied by clear warning of being performed under expert supervision and warn consumers against from re-enacting the same.
15. With the growing impact of social marketing and the concerns emerging from misleading and fake news by unscrupulous players, the Company ensures dissemination of the right facts about our products and brands to consumers to uphold the reputational equity of our brands.

COMMUNICATION PRINCIPLES TO AND FOR CHILDREN

1. We believe and encourage that children should stay active and enjoy healthy, balanced, diversified diets in right portions to remain happy and fit.
2. We support the role of gatekeepers like responsible adults (especially parents) in guiding children to make responsible food choices.
3. We will profile all our packaged food products for target age groups as per the internal criteria laid down in ITC Limited's Food Division's Nutritional Profiling System (NPS).
4. As a responsible organization, we will continue to sharpen and modify the above criteria basis evolving regulations.
5. By marketing to children, we mean:
 - a. Presence of children of a specific age bracket in a brand communication.
 - b. Usage of children in that age bracket as influencers.
 - c. Communicating on channels where % of children as viewers is > 25% and investing more than 20% of the overall spends on campaigns on such channels.
 - d. Design sensibilities of digital assets crafted for children in that age bracket.
 - e. Gifts, toys, and giveaways primarily appealing to children.
6. We will not market packaged food products to children (all items as in clause 5 restricted) below 18 years unless such packaged food products are compliant with ITC Limited's Food Division's internal Nutritional Profiling System (NPS) for children.
7. Marketing of packaged food products meant for adults i.e. anyone above the age of 18 years, will be expanded to children below 18 years only if such packaged food products comply with the NPS for the target age group as defined in the NPS.
8. We will only allow use of children in brand communication material
 - a. When they are the target group and product is compliant to their age respective NPS
 - b. When they are not the target group of the product and not consuming/suggested to consume the marketed product but are used purely for creative story telling
9. Advertising should not portray or encourage any behaviour which can create anxiety in children, including depiction of extreme graphic violence or sexual innuendos to avoid moral harm to children.
10. Sampling and promotional activities of products in educational institutes and events will be done with the prior consent of the school administration and event organisers in compliance with all applicable laws.
11. We fully support the "The Eat Right School programme" which was launched in September, 2016 as Safe and Nutritious Food (SNF) at School programme, with the objective to create awareness about 'Eating Healthy', 'Eating Safe', and 'Eating Sustainably' among school children and through them in the community at large, by FSSAI.

DATA COLLECTION:

1. All the data collected for any marketing and communication purpose at all levels are done with written consent and in line with the local and national laws.

COMPLIANCE & MONITORING:

1. All the appropriate stakeholders and the marketers will be required to take an assessment of their understanding of this policy.
2. Annual reviews on the understanding and implementation would be tracked and recorded by our internal audit teams.
3. This will also be audited annually by independent, external audit firm.