

Responsible Marketing Position

Including marketing and advertising to children

Responsible Marketing

Ocado Retail is committed to the responsible marketing and advertising of food and drink so that our consumers can make informed choices. To ensure that we have consistently high standards of marketing and advertising we apply the general principles outlined below across all marketing channels, which includes but is not limited to: PR, broadcast, print, outdoor, digital (website, app, social, blogs), direct mail, email, SMS, brand ambassadors, company campaigns, sponsorships and partnerships.

Nutrition and health claims

- All our advertising must be truthful, accurate and well substantiated.
- Our marketing practices must comply with all applicable legal requirements, Codes of Practice and guidelines set by regulatory authorities and must further comply with any self-regulatory commitments that Ocado Retail undertakes.
- Our marketing and advertising activities must respect the ethics and values specific to our customers and particularly parents.
- We believe that consumers have a right to privacy and all our marketing practices including social marketing, will comply with all applicable laws relating to privacy disclosures, permission marketing and collection and use of personally identifiable information.
- Our advertising should promote a balanced approach to healthy eating, and therefore high fat, salt and sugar products (“HFSS”) should be balanced with non HFSS products.

- Our communication must reflect moderate consumption and portion sizes appropriate to the occasion. Our advertising should never promote or endorse excessive consumption. Promotions such as free give-aways of large/excessive quantities of an HFSS product in one occasion like confectionery are not permitted, e.g a year's supply of chocolate (152 x 180g chocolate bars) delivered to your door in one go for free.
- Any nutrition and health claims made must not mislead, must be accurate and appropriately substantiated and must be stated in accordance with the relevant regulations, Codes of Practice and Ocado Nutrition Marketing Guidelines. No nutrition or health claims are permitted on our Own Range products that have red traffic lights on the front of pack nutrition labelling (apart from where the fats or sugars are coming from naturally occurring sources i.e nuts or fruit).
- The marketing of healthy recipes within OcadoLife magazine and Ocado.com must comply with the Ocado Nutrition Marketing Guidelines, these guidelines are summarised for the customer both in OcadoLife magazine and online.

Marketing and advertising to children

Ocado Retail is committed not to market or advertise to children, and we ensure our practices will never encourage pester power or over consumption. Our website and services are marketed to adults (account holders must be over 18) and we will never intentionally target children. Where audience segmentation options are available (e.g. online advertising) we will never intentionally advertise to under 18s. The following principles apply to all marketing channels:

Guiding principles

1. Supporting the role of parents in guiding and deciding which food and drink is appropriate for their children. We will actively encourage healthy eating practices, through recipe inspiration, information and advice. All children's recipes must comply with the Ocado Nutrition Marketing Guidelines.
2. Will never intentionally advertise or market HFSS products directly aimed at children under the age of 18 years.
3. Licensed characters and endorsements of celebrities appealing to children below 12 years of age must never be used to directly advertise HFSS foods and should instead promote healthy eating practices.
4. Any campaigns focusing on children such as 'back to school' or 'lunch box' must hero non HFSS products within the marketing (with the exception of cheese) and the mix of products featured should promote a balanced approach to healthy eating reflective of the government guidelines. Any editorial content supporting these campaigns must comply with the Ocado Nutrition Marketing Guidelines.