

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, and to ensure that we have consistently high standards in our communication we apply the four general principles outlined below across all marketing channels. This includes but is not limited to: PR, broadcast, print, outdoor, digital (website, app, social, blogs), direct mail, email, SMS, brand ambassadors, company campaigns, sponsorships, partnerships and Supplier Funded Media in paid-for media (such as TV).

1. All our advertising must be truthful, accurate, well substantiated and must not mislead.
2. Our marketing practices must comply with all applicable UK legal requirements, codes of practice and guidelines set by [the applicable] / [the relevant] regulatory authorities (such as the UK Code of Non-Broadcast Advertising and Direct & Promotional Marketing ([CAP code](#)) and the UK Code of Broadcast Advertising ([BCAP code](#))) and must further comply with any self-regulatory commitments that Ocado Retail undertakes.
3. Our marketing and advertising activities must align with the standards and expectations of our customers, particularly parents.
4. We respect the rights of consumers and ensure we comply with all applicable laws and regulations.

Promoting healthy, sustainable diets is one of our key strategic objectives, and as such we are committed to clear and honest communication about health and sustainability. Our health communications aim to promote the principles of a varied, healthy balanced diet in accordance with the Governments [Eatwell Guide](#).

Healthy Diets

- Our advertising must comply with The Advertising (Less Healthy Food Definitions and Exemptions) Regulations 2024 and should promote a balanced approach to healthy eating.
- 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 a High Fat, Sugar or Salt (HFSS) product in one occasion like confectionery are not permitted.
- All applicable Ocado own brand products will display nutrition information on the packaging as well as online. This includes the UK Government's recommended Front of Pack Nutrition labelling scheme as well as a full nutrition breakdown on the back of pack (see Nutrition Information factsheet for more information).
- 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 Guidelines for Recipes, these guidelines are summarised for the customer both in OcadoLife magazine and online.

HOW IS IT HEALTHY?

Every recipe in this feature is 'healthy', meaning it provides a balance of veggies (at least 2 of your 5 a day), starchy carbs and protein, and is less than 30% of your daily reference intake for calories, fat, saturates, sugar and salt.*

Marketing and advertising to children

Ocado Retail is committed to not marketing or advertising to children, and we ensure our practices will never encourage 'pester power' or over consumption. Our website and services are marketed to adults, and we never intentionally target children. As an online only grocery retailer, where account holders must be over the age of 18, it is the parents/carers that make the majority of purchasing decisions rather than being driven by the pester power of children that is often experienced in the in-store environment. 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:

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. We will never intentionally advertise or market HFSS products directly aimed at children under the age of 18 years.
3. We will never use licensed characters and endorsements of celebrities appealing to children below 12 years of age to directly advertise HFSS own brand products, and should instead promote healthy eating practices in accordance with the '[Eatwell Guide](#)'.
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 UK government guidelines. Any editorial content supporting these campaigns must comply with the Ocado Nutrition Marketing Guidelines.

5. We have voluntarily age restricted the sale of energy drinks, diet pills and CBD oil. This is strictly enforced as part of our 'Challenge 25' policy.

Environmental Claims

Any claims relating to the environmental impact of our own label products or branded products within any of our marketing channels, adhere to the CAP Code and BCAP Code and the Competition and Market Authority's [Green Claims Code](#). All claims must be truthful, unambiguous and based on meaningful comparisons, consider the full life cycle of the product, and must be substantiated.

Alcohol and low/no alcohol

We are committed to promoting responsible alcohol consumption. We will not promote excessive or irresponsible alcohol consumption in any of our marketing channels, and we promote low and no alcohol products across our platforms. To empower informed choices, our website provides comprehensive information for all alcoholic beverages, including ABV, number of units, dietary, allergy and nutritional information where it exists. Furthermore, we are members of Drinkaware.

Training and Compliance

All the relevant teams within Ocado Retail are trained in our position as well as receiving training on Nutrition and Health Claims Regulations. We request our agencies adhere to this policy when working with us.