

Marketing and communications policy

Purpose and Scope

Our vision is to create inspiring food for every occasion. For us, good food means paying attention to the expectations set for the entire food chain as well as **commitment to meeting all the statutory and stakeholder requirements set for our business and our products.**

Our aim is to create value that can be sustained by offering consumers a wide variety of tasty, healthy and modern food choices that respond to changing needs and food situations. The way we market our branded products is equally important. Our consumer communication, such as advertising, package designs and social media, is aimed at helping consumers make informed choices. Our consumer communications must follow certain principles to ensure that we gain and maintain consumers' trust in our company and brands.

Atria Group companies follow the Advertising and Marketing Communications Code of the International Chamber of Commerce.

Approval:

This policy is approved by the CEO and maintained by the Executive Vice President, Marketing & Market Insight. It is subject to review on an annual basis and applicable changes are communicated to the policy implementing organizations.

Target audience: Public, marketing and communications functions

Approval date: 28 March 2019

Review date: 8 March 2021



Consumer communications

The content of all consumer communications must reflect good taste and social responsibility and must be in accordance with each country's laws and regulations. Although standards in each Atria country may vary, consumer communications must not display bad manners, offensive behaviour and there must never be any intention to offend or shock anybody. Advertising and other communications content and activities must not be discriminatory or offensive towards any religious, ethnic, political, cultural or social groups.

Communications must not include the names of competitors directly or give inaccurate representations of competing products.

It is against Atria Group's principles to sponsor or place advertising or any other communication in social media and other media, at events or on websites that might attract consumers or viewers based on content involving exploitation, violence or sex or that encourages offensive behaviour of any kind.

When collecting consumer data, Atria Group follows the EU General Data Protection Regulation (GDPR) and other applicable privacy legislation and regulations.

Communication to minors

Atria Group has very limited communications or advertising directed to people under the age of 18. However, if marketing communication is directed to minors, special care must be taken. In such marketing communications, Atria Group carefully follows the applicable legislation and regulations of each country, and the provisions of Article 18 of the Advertising and Marketing Communications Code of the International Chamber of Commerce.

<https://www.kkv.fi/en/decisions-and-publications/publications/consumer-ombudsmans-guidelines/by-trade/children-and-foodstuffs-marketing/>

<https://www.kkv.fi/en/facts-and-advice/marketing-and-customer-relationships/good-marketing-practices/>

Communication on packages

With regard to communication on product packaging, Atria Group follows the applicable legislations and regulations of each operating country.

Information on nutritional content must be presented in a way that accurately reflects the nutritional composition of the product. Specific claims or suggestions made on packaging must comply with the applicable EU regulations and the legislation of the country in question.

Food pictures, claims and propositions on packaging should encourage moderate food consumption.

Health-related claims must have a proven scientific basis and must be easily understandable by consumers.



Sponsoring

Atria may conclude sponsorship agreements as a part of promotion and advertising. All sponsorship of activities must be in line with Atria's Code of Conduct, this Policy and Anti-corruption policy.

When potential sponsorships are evaluated, they should meet the following requirements:

- i. it complies with Atria's strategy and set targets,
- ii. it reaches Atria's key focus groups,
- iii. it benefits Atria's business on a broader level, and
- iv. its media coverage can be measured.

A written agreement regarding sponsorship must be in place and be signed by all stakeholders involved which sets out what each party has agreed.