

ETHICAL MARKETING POLICY



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1.0 INTRODUCTION

As a purpose driven brand, health, ethics and environmentalism sit at the heart of the Vivobarefoot business and should be reflected in everything we do – including our marketing.

To sell more stuff and make more profit, companies have relied on advertising to convince consumers that buying their product or service is key to happiness – leading to unethical marketing practices.

At Vivobarefoot, we aim for 'natural' marketing; treating customers with respect and focusing on long term growth – building strong relationships with our community through set of shared values to realise our vision of reconnecting people and planet and authentic, healthy digital content.

Marketing in an ethical way focuses not only on how our product benefits our customers, but also how our business is striving to regenerate people and planet at large.

We are a brand with a powerful public service message that aims to bring that message to the world in a way that stays true to those values in order to engage and empower our community.

Ultimately, the public have the right and power to information on Vivobarefoot does business. The marketing function has a major responsibility to make this happen the right way at the right time.

2.0 PURPOSE

This ethical marketing policy (the 'Policy') sets out Vivobarefoot's position on marketing practices and efforts to go beyond compliance to ensure honesty, fairness and responsibility in our ways of working.

3.0 SCOPE

This Policy applies to all employees and third parties associated with Vivobarefoot, or any of our subsidiaries or their employees, no matter where they are located.

The Policy also applies to Officers, Trustees, Board and/or Committee members at any level.

In the context of this Policy, third-party refers to any individual or organisation that Vivobarefoot meets and works with including but not limited to suppliers, contractors, distributors agents and customers.

4.0 PRINCIPLES

4.1 LEGALLY COMPLIANT

All marketing communication must be legal, decent, honest and truthful.

Prepare all marketing communication with a sense of responsibility to consumers and society.

Respect the privacy and confidentiality of customers, protecting them from unwarranted infringements of privacy.

Do not unfairly portray or refer to anyone in an adverse or offensive way.

4.2 FOSTER TRUST

Seek to build long term partnerships with customers by being honest and straightforward.

Take all reasonable care to avoid misleading statements, concealment, and overstatement in all advertising and public statements.

Strive to communicate clearly with all constituencies.

Do not imply that expressions of opinion are objective claims or make any subjective claims that might mislead the consumer.

Hold documentary evidence to prove claims that consumers are likely to regard as objective and that are capable of objective substantiation.

Do not cause fear or distress without justifiable reason. If it can be justified, the fear or distress should not be excessive. Do not use a shocking claim or image just to attract attention.

4.3 ENVIRONMENT

Create advertising consistent with the social, economic and environmental principles of sustainable development.

Take into account Government guidance including the Green Claims Code publish by DEFRA and BIS.

Ensure the basis of environmental claims are clear and not misleading.

Ensure the meaning of all terms used in advertising is clear to customers.

Do not make unqualified claims and any absolute claims must be supported by a high level of academic and scientific evidence.

Base environmental claims on the full life cycle of an advertised product, unless the marketing communication specifically states otherwise, and make clear any limitations.

Do not suggest claims are universally accepted if a significant division of informed of scientific opinion exists.

4.4 DIVERSITY

Understand that the 'average consumer' might not always be the standard.

Acknowledge that there are groups who are vulnerable that must be considered in judging how advertising will be understood and action upon by society in general.

Acknowledge the basic human dignity of stakeholders.

Value individual differences and avoid stereotyping customers or depicting demographic groups e.g. gender, race, sexual orientation in a negative or dehumanising way.

Listen to the needs of customers and make all reasonable efforts to monitor and improve their satisfaction on an ongoing basis.

Make every effort to understand and respectfully treat all stakeholders (buyer, suppliers, distributors etc) in our community and the cultures they are from.

Make additional commitments to vulnerable market segments such as children, seniors, economically impoverished and others who may be substantially disadvantaged.

Do not contain anything in marketing communications likely to cause widespread offence.

4.5 CHILDREN

Respect that care should be taken when featuring or addressing children in marketing communications and take care when featuring children in advertisements.

Ensure marketing communications that are addressed to, targeted directly at or featuring children contain nothing that is likely to result in their physical, mental or moral harm.

Do not show children in hazardous situations or behaving dangerously expect to promote safety.

5.0 RESPONSIBILITIES

The senior marketing team, led by the Marketing Director, have the ultimate responsibility and accountability for ensuring compliance with this Policy.

The wider marketing department are responsible for the delivery of activities in line with this Policy.

The Directors, led by the Chief Executive Officer, should be consulted where any key decision points arise or in case of any breach of our Policy.

Compliance with this Policy extends to our marketing partners and suppliers, including ambassadors.

Vivobarefoot will not work with any partner unwilling to comply with this Policy.

All employees and third parties who have any responsibility for the activities which this Policy relate to, will be required to understand and agree to this Policy.

6.0 TRAINING & COMMUNICATION

Vivobarefoot will provide regular ethical marketing training to all relevant employees.

All employees will have access to this Policy via a shared online portal.

The Marketing Director must ensure any employees where this Policy is relevant to their operational responsibilities have agreed to this Policy and attended training.

Vivobarefoot will communicate this Policy to all third parties at the outset of any busines relationship, and as appropriate thereafter.

7.0 MONITORING & REVIEW

Vivobarefoot will evaluate the effectiveness of this Policy and the implementation of it on an ongoing basis, to ensure that it remains effective and reflects best practice.

We will regularly assess internal and external control systems and procedures and encourage feedback from employees and customers in our community on how this Policy can be improved.

8.0 REPORTING

Vivobarefoot will include information on compliance to and continuous improvement of this Policy in interim and annual business reports to ensure transparency of operational practices.