



Keurig Dr Pepper Canada Responsible Marketing Policy

Purpose

At Keurig Dr Pepper Canada (KDP Canada), our values, ethics and integrity are deeply embedded into how we conduct ourselves and operate our business. This includes our commitment to responsibly marketing our beverage and food products, as well as our appliances. As a company committed to operating responsibly, we aim to ensure that our beverages make a positive impact with every drink. Our products have been enjoyed by families for generations and we respect and appreciate the trust our consumers put into our company and our products. To ensure that trust, we market and advertise our products in a truthful manner, appropriate for the intended audience, and in compliance with all applicable laws.

This policy establishes standards for responsible, lawful, and ethical marketing practices across all KDP Canada brands. It ensures communications are truthful, transparent, and respectful of audiences, especially children, and compliant with Canadian federal and provincial laws, as well as recognized industry codes. KDP Canada will review this policy at least annually and adjust as necessary to reflect evolving consumer preferences, new regulations, and changes in applicable law.

Scope

This policy pertains to products and brands marketing, advertising, packaging, promotional, sponsorship, social media, influencer and digital communications authorized and approved by Keurig Canada ULC and Canada Dry Mott's Inc. (together, "KDP Canada") across Canada. Additionally, we regularly monitor unauthorized third-party communications regarding our products and services.

Responsible Marketing Guiding Principles

- KDP Canada will comply with all applicable federal, provincial, and municipal laws and regulations related to the advertising and marketing of its products, including appliances. In the event of any non-compliance, KDP Canada will take prompt action to rectify it.

- KDP Canada will be honest, truthful and not misleading in all marketing and advertising. All marketing representations and claims must be clear, accurate, and appropriately substantiated.
- KDP Canada will not feature any deceptive price claims or discounts, unrealistic price comparisons or exaggerated claims as to worth or value.
- In all its marketing communications, KDP Canada will be respectful and inclusive, will avoid targeting or exploiting vulnerable audiences, including children, and will strive to make its marketing materials accessible to persons with disabilities in accordance with relevant federal and provincial legislation.
- KDP Canada and its agency partners will not select media placements in or adjacent to content that is discriminatory or harassing to individuals or groups based on sex, race, colour, national or ethnic origin, ancestry, religion, age, marital status, gender identity or expression, physical or mental disability, place of birth, pregnancy, sexual orientation, or any other personal characteristic protected by law.
- KDP Canada will respect the intellectual property rights of others in all marketing communications and will not infringe upon trademarks, copyrights, or other proprietary rights. In the spirit of transparency, KDP Canada will provide accurate ingredient lists, nutritional information and health claims on individual packaging, outer packaging in accordance with the *Food and Drugs Act* (Canada) and the *Safe Food for Canadians Regulations*. Such information will also be made available for beverages manufactured by Canada Dry Mott's Inc. on its website at www.kdpproductfacts.ca.
- KDP Canada's marketing practices are guided by the *Canadian Code of Advertising Standards* administered by Ad Standards Canada. For more information, consult the [Canadian Code of Advertising Standards](#).

Marketing to Children

- KDP Canada will comply with the *Code for Responsible Advertising of Food and Beverage Products to Children* ("FBA Code") and associated guidelines. In accordance with this national standard, KDP Canada will not employ behavioural advertising or profiling for audiences reasonably believed to be minor and will not do any advertising in schools.
- KDP Canada will also comply with the *Broadcast Code for Advertising to Children* that complements the general principles outlined in the Code. KDP Canada acknowledges that marketing content likely to appeal to children will:
 - avoid exploiting their credulity or sense of loyalty;
 - not urge them to purchase or persuade others to purchase; and,
 - not include unsafe or inappropriate behaviour.
- In addition to the federal framework, KDP Canada will comply with all relevant provincial regulations related to marketing to children. In the province of Quebec, KDP Canada will comply with the *Consumer Protection Act* (Quebec) and will not direct any advertising at children under 13 years of age.

Environmental, Sustainability, Performance and Quality Claims

- KDP Canada will comply with all relevant legislation including the requirements of the *Competition Act (Canada)* pertaining to greenwashing, performance, quality and environmental claims.
- KDP Canada will ensure that all claims made are truthful, fact-based and easily understandable by the target audience.
- KDP Canada will avoid any vague, exaggerated or unqualified sustainability or environmental claim that could lead to consumer confusion. KDP Canada will apply best practices related to environmental and sustainability claims to avoid any perception of greenwashing. More specifically, KDP Canada will adequately substantiate all claims pertaining to the sustainability attributes of a product, packaging, the business or its activities with adequate evidence including (but not limited to) internationally recognized methodologies, defined action plans, data and adequate and proper testing when relevant.
- KDP Canada will adequately substantiate any quality or performance claim related to a product or packaging with adequate and proper testing, as required by the *Competition Act (Canada)*. Examples of such claims include those focusing on how a product will perform, how efficacious it is, or how long it will last.

Digital Privacy, Behavioural Targeting and Commercial Electronic Messages

- KDP Canada will collect, use, and disclose personal information in accordance with applicable privacy laws, including *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) and applicable provincial privacy legislation, and will do so lawfully, transparently, and with appropriate consent.
- KDP Canada’s electronic communications will comply with all relevant regulations including the *Consumer Protection Act (Quebec)*, PIPEDA and *Canada’s Anti-Spam Legislation* (“CASL”). KDP Canada will obtain meaningful, express consent for all behavioural targeting, including clear disclosure of what data will be collected, the purposes for which it will be used, and any third-party involvement. KDP Canada will comply with all applicable cookie consent requirements under Quebec’s Law 25 and other applicable privacy legislation.
- KDP Canada will provide clear privacy disclosures in accordance with PIPEDA and applicable provincial privacy legislation, including information about the purposes for which personal information is collected, used, and disclosed. KDP Canada will provide simple and accessible opt-out mechanisms and will honour all opt-out requests.
- KDP Canada will comply with *Canada’s Anti-Spam Legislation* and obtain express or implied consent before sending any commercial electronic messages (including but not limited to emails, SMS, social media direct messages, and instant messages sent to any electronic address) and will include a functional unsubscribe mechanism in every message. KDP Canada will maintain records of consent and unsubscribe requests for compliance purposes.

Social Media and Influencer Marketing

- KDP Canada will ensure compliance with all applicable disclosure requirements for all influencer and social media marketing campaigns in accordance with Ad Standards Canada's *Influencer Marketing Disclosure Guidelines* and the *Competition Act (Canada)*. All material connections between KDP Canada and influencers must be clearly and conspicuously disclosed, including paid partnerships, sponsored content, gifted products, and any other form of consideration.
- KDP Canada acknowledges that responsibility for proper disclosure compliance is shared among all parties involved in influencer marketing collaborations, including KDP Canada, its agencies, PR firms, and the influencers themselves.
- KDP Canada will provide clear disclosure guidelines to all influencers and partners and will monitor compliance with disclosure requirements.

Marketing of Alcohol-Based Beverages

- KDP Canada will comply with all federal, provincial, territorial and municipal laws and regulations governing the advertising and marketing of alcohol-based beverages, including but not limited to restrictions on advertising to minors, content requirements, and placement restrictions. KDP Canada will ensure all alcohol marketing is socially responsible and does not encourage excessive consumption or target vulnerable populations.

French Language in Marketing Communications

- KDP Canada will comply with all bilingual requirements under the Consumer Packaging and Labelling Act and the Food and Drugs Act, as administered by Health Canada. All mandatory information on food packaging will be displayed in both English and French.
- In addition, KDP Canada will ensure that all marketing, advertising, packaging, labelling, point-of-sale materials, digital experiences (including Québec-facing webpages, mobile apps and digital advertising), and consumer-facing documents (product leaflets, user manuals, warranties and sales contracts) distributed, offered for sale, or displayed in the province of Québec comply with the Charter of the French Language (as amended by Bill 96 / Law 14) and applicable Québec regulations. All communications and consumer information intended for Québec consumers must be provided in French. Wherever English or another language is present, French must have at least equal prominence and, where required by law, must be predominant.

References

Advertising Standards Canada, *Broadcast Code for Advertising to Children* [online], [The Broadcast Code for Advertising to Children – Ad Standards](#) (website consulted in November, 2025).

Advertising Standards Canada, *Canadian Code of Advertising Standards* [online], [The Code Online – Ad Standards](#) (website consulted in November, 2025).

Advertising Standards Canada, *Code for the Responsible Advertising of Food and Beverages* [online], [FoodAndBeverageAdvertisingCode-FINAL-20230505.pdf](#) (website consulted in November, 2025).

Advertising Standards Canada, *Influencer Marketing Disclosure Guidelines* [online], <https://adstandards.ca/wp-content/uploads/AdStandards-Influencer-Guidelines-EN-2023-FIN.pdf> (website consulted in November, 2025).

Government of Canada, *Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act* [online], <https://laws-lois.justice.gc.ca/eng/acts/E-1.6/index.html> (website consulted in November, 2025).

Government of Canada (CFIA), *Bilingual Food Labelling* [online], [Bilingual food labelling - inspection.canada.ca](#) (website consulted in November, 2025).

Government of Canada, *Competition Act* [online], [Competition Act](#) (website consulted in November, 2025).

Government of Canada, *Food and Drugs Act* [online], <https://laws-lois.justice.gc.ca/eng/acts/f-27/> (website consulted in November, 2025).

Government of Canada, *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c. 5 [online], available at: <https://laws-lois.justice.gc.ca/eng/acts/P-8.6/> (website consulted November 2025).

Government of Canada, *Safe Food for Canadians Act* [online], <https://laws-lois.justice.gc.ca/eng/acts/s-1.1/index.html> (website consulted November 2025).

National Assembly of Quebec, *Bill 96 – An Act Respecting French, the Official and Common Language of Quebec* (2022), [Bill 96 - Assented to \(2022, chapter 14\)](#).