

# HAYPP GROUP

## MARKETING AND PRODUCT STANDARDS FOR NICOTINE CONTAINING CONSUMER PRODUCTS

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Available to	Anyone
Owner	General Counsel

## **The Haypp Group Marketing and Product Standards for nicotine containing consumer products – *version 3***

### **Introduction**

The Haypp Group Marketing and Product Standards (the “Standards”) set out standards relating to nicotine containing consumer products that do not contain tobacco.

The target audience for the Standards are, *inter alia*, organisations and their employees and agents as well as individuals engaged in the manufacture, distribution, marketing or retailing of nicotine consumer products (“Business Partners”). Haypp Group recommends that all European public officials and policy makers implement these Standards in national legislation.

Haypp Group’s Business Partners undertake to adhere to these Standards and shall ensure that their Business Partners comply with the Standards. In the event of non-compliance with the Standards, Haypp Group reserves the right to terminate any business agreement with a Business Partner at any time.

### **Sale of products**

The target audience of Haypp Group’s nicotine containing consumer products are adult users of nicotine products who seek another *recreational* alternative to the products currently on the nicotine market.

Haypp Group and its Business Partners undertake to ensure that all nicotine containing consumer products shall only be sold to adults of legal age in each jurisdiction. In the absence of local laws regulating legal age, Haypp Group and its Business Partners undertake to apply an ‘Under 18 No Nicotine’ principle which firmly states that all nicotine containing consumer products shall only be sold to adults who are at least 18 years of age. This means that no marketing advertising or promotion of nicotine containing consumer products shall be directed to persons under the legal age limit applicable to the relevant sales territory.

To prevent the underage use of nicotine containing consumer products, Haypp Group is committed to educating, informing, and cooperating with suppliers, distributors, retailers, authorities, and public officials.

The age verification must be carried out at the time of purchase and should be as robust as possible, considering local limitations.

## Product labelling

The packaging must inform the retailer and consumer of the risks connected with the use of the products. If not defined in national legislation, each unit packet which consumers have access to must carry appropriate texts or symbol(s) clearly visible stating that;

- “This product contains nicotine which is a highly addictive substance” or similar; and
- “Not for under 18 years” (this statement can be altered to comply with local laws relating to age requirement)

Each unit packet which consumers have access to should include;

- a list of all ingredients contained in the product set out in descending order by weight, where those ingredients acting mainly as flavouring those can be aggregated using the name “flavouring”;
- an indication of the nicotine content of the product and the nicotine content per pouch;
- the batch number; and
- a recommendation to keep the product out of reach of children.

## Product

The product content shall at all times comply with relevant laws including, but not limited to, food legislation, tobacco and/or nicotine legislation, industry regulations and advice and rules of conduct from authorities.

The total amount of nicotine, as sold, and including any form of nicotine compounds, may not be higher than 20 mg per pouch.

The consumable product’s pH value should not exceed 9.1, unless risk assessment of the final product, that includes appropriate data and is documented in a toxicological risk assessment, supports the final product pH used.

The products are not a food or intended to be ingested. However, the wrapper and packaging that is in contact with the product must comply with appropriate national and European regulation, governing the composition and properties of food-contact materials.

A tamper-evident seal is recommended on the consumable’s packaging, to alert the consumer if the packaging has been opened before purchase.

# HAYPP GROUP

## Marketing

Products and services should be advertised and promoted in a manner consistent with applicable laws and regulations. The following standards shall always, subject to such laws and legislation, be applied as a minimum.

- All marketing communication shall be directed to persons above the legal age limit e.g. in respect of choice of media, placing, execution and manner.
- All consumer advertising (e.g. ads, web-based ads, leaflets, point of sales material) must include the text *“Not for under 18 years”* clearly visible. If local law provides a different age requirement, *“18”* can be substituted for the applicable legal age limit, e.g. 21.
- All consumer advertising must include a warning clearly visible stating that *“This product contains nicotine which is a highly addictive substance”*.
- For webpages, moving images (e.g. video) and similar dynamic advertising the referred age limit in form of text or logotype and substance warning must be included in a way that the viewer will see it at the beginning. In social media, the information in the text, logotype and warning shall be included in a manner taking into account the technical and other limitations of the media.
- All nicotine containing consumer products sold are intended for recreational use, meaning that no marketing communication or communication on the unit packet shall include any medical claims (e.g. relating to smoking cessation or reduction), references to food or tobacco products
- Celebrities, ambassadors, actors or models, who are, or clearly appear to be, under the age of 25, shall not be engaged in marketing communication.
- Product placement in computer games, movies, theatres or on television shall not be used as a marketing tool.
- Names or logotypes of product brands being sold should not be placed on any promotional items intended to be used mainly by persons under the legal age limit.
- Marketing activities on events and sponsoring shall be limited to events that are attended only by persons above the legal age limit.
- Product samples may only be given to people above the legal age limit. The party offering samples must verify that the individual receiving the sample is of legal age to consume the product.

## Governance

All new or revised advertising including promotional items shall follow the same marketing standard process for review and approval by the respective Business Partner’s legal department as for all other products we are manufacturing or selling.