

The Annual Code Report 2007

THE PORTMAN GROUP'S CODE OF PRACTICE
ON THE NAMING, PACKAGING AND PROMOTION OF ALCOHOLIC DRINKS

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Portman Group

The **Portman Group** was established in 1989 by the leading UK drinks producers. Its purpose is to encourage and champion the alcohol industry's commitment to social responsibility through its Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks. It also represents its member companies' views on alcohol-related social issues.

Its full members are:

Bacardi-Martini; Beverage Brands (UK), Brown-Forman; Carlsberg UK; Coors Brewers UK; Diageo GB; Inbev UK; Pernod Ricard UK; and Scottish & Newcastle.

Foreword by the Portman Group Chief Executive, David Poley



2007 was an extremely busy year for the Portman Group with concern about alcohol misuse reaching unprecedented levels. Rarely a day passed without newspaper headlines calling for tighter restrictions on the availability, price and marketing of alcoholic drinks. Concern focused on the impact of 24 hour licensing, underage sales, supermarket pricing and whether alcohol tax rises and an advertising watershed ban would reduce alcohol-related harm.

The Government published its updated alcohol strategy, "Safe, Sensible, Social", in June. This sets a framework for a rigorous examination of the industry's social responsibility standards, including the effectiveness of our Code. The number of complaints under our Code remains at a consistently low level. We believe there is a good level of awareness of the Code among industry, which is demonstrated by the record number of company requests for confidential marketing advice during the year. In early 2008, however, we will be commissioning an independent audit of drinks producers' compliance with our Code. Any product failing to meet the Code's high standards will be removed from sale. We are determined to identify any irresponsible marketing and this audit should help us do that.

During 2007, we have been striving to raise awareness of the Code rules and the independent complaints process. For the first time, advertisements were placed in the regional press in 16 UK cities and in magazines read by people who might come across drinks marketing through their work. Additionally, a new consumer guide to making complaints and 20,000 drip mats promoting the Code have been sent to partners in alcohol agencies, trading standards, police licensing and others working to reduce alcohol-related harm.

In June, we unveiled the 4th edition of our Code of Practice which came into effect in January 2008. This includes two new rules of significance. Firstly, branding of drinks companies must no longer appear on children's replica sports shirts. The industry has never wanted to communicate with children. Therefore, this

unintended consequence of sport sponsorship is set to end with the new restriction applying to sponsorship contracts signed after 1 January 2008. The other new rule prevents drinks producers from urging consumers to drink rapidly or down their drinks in one. Only consumers can determine how they drink but it is vitally important that producers do not encourage any potentially harmful style of consumption. Our new website includes guidance for producers on how we anticipate the new rule to be interpreted by the Independent Complaints Panel. There is also a new section within the Code giving best practice advice for companies on the use of website age verification pages, unit labelling and the promotion of the drinkaware website.

Amid the clamouring for increased Government intervention, encouraging trends in the nation's drinking are emerging: overall consumption continues to drop; the number of harmful adult drinkers is falling and there are more child abstainers than ever before. It is those 11–15 year-olds who do drink that pose the biggest challenge. They are fuelling the media's appetite for alcohol stories and driving the political agenda. We remain convinced that the way to improve their drinking behaviour is through effective law enforcement and better education. To help achieve this, the Portman Group is donating more than £6million in funding to the Drinkaware Trust, the new charity which has taken over the responsible drinking campaigning work that we used to undertake.

Finally, I would like to thank Sir Richard Tilt, who in his first year as Chairman of the Independent Complaints Panel, has proved to be a very able successor to Lord Condon. I would also like to pay tribute to the Portman Group staff for their hard work throughout the year.

A handwritten signature in black ink that reads "DPoley". The signature is stylized and written in a cursive-like font.

David Poley
Chief Executive, Portman Group

December 2007

Report of the Chairman of the Independent Complaints Panel, Sir Richard Tilt



This report is written at the end of my first year as Chairman of the Panel. As I took over from Lord Condon the new Drinkaware Trust was established and the Portman Group adjusted to the smaller but more focused task of handling complaints and providing advice to the industry. It has been a year with a very high level of scrutiny of the alcohol industry with an increasing profile given to issues of alcohol use in the context of public health. It is unlikely that this will abate and the industry will need to ensure that it continues to be proactive in promoting the responsible use of alcohol.

In this context the Complaints Panel has an important role to play both in dealing with potential individual breaches of the Code and in setting the overall standards for the industry. The Panel has clearly established its independence and will continue to guard that strenuously. The members are strong contributors from a variety of backgrounds who have a track record of reaching balanced and proportionate decisions.

The number of complaints this year has been low (7) and I welcome the Portman Group's action to mount a Code awareness campaign including details of the complaints process. For the Code to be as effective as possible it needs to become well recognised and understood by the wider public. In previous years complaints have tended to be clustered around one issue but that has not been the case in 2007 where complaints have ranged across appeal to under 18's (Vodka based RTD range and Chocolate and Cream teddy gift pack), illegal drugs (Cannabis range of drinks), sexual success (Rubbel Sexy Lager) and intoxicating effect and immoderate consumption (Pink Elephant).

Interestingly for us the beer from Belgium with a pin-up whose swimming costume could be removed by rubbing (Rubbel Sexy Lager) attracted very considerable media interest which was good from the point of view of publicity for the Code but disappointing in that most of the coverage portrayed the panel as kill-joys.

A revised Code (4th edition) will be introduced from January 2008 with strengthening in respect of any encouragement to consume drinks rapidly. I am pleased that the Portman Group is sufficiently flexible and responsive to keep abreast of issues and to revise the Code as necessary in changing circumstances.

I also very much support their initiative to carry out an audit of compliance with the Code in 2008.

I am confident that the Code and the complaints process will continue to play its part in encouraging responsible marketing with a high level of compliance.

I conclude by thanking the panel members for their thoughtful and careful consideration of complaints. I pay tribute to the Portman Group Secretariat who support us so ably.

A handwritten signature in black ink that reads "Richard Tilt".

Sir Richard Tilt
Chairman of the Panel
December 2007



“Chocolate and Cream” Gift Pack

The Gift Business (exclusively for ASDA Stores Ltd)

Final Decision: **9 February 2007**

COMPLAINT SUMMARY

“The pack contains a mug, small [bottle of liqueur] and a soft toy bear. It has a clear label stating that it is not suitable for under 18s but contains a bear that is very suitable for a small child... My biggest concern with this product is that the pack is designed to attract children and I don't think that is right as it has alcohol inside. It is quite difficult to explain this to a 6 year old who picks this up in store.”

COMPLAINANT

Member of the public, London

DECISION

Under Code paragraph 3.2 (g) **UPHELD**

The Gift Business maintained that the gift pack was quite obviously not designed to attract children. They pointed out that a prominent label on the front of the gift pack stated “Contains alcohol. Not suitable for under 18s” and argued that the bear was packaged and positioned in such a way as to diminish its potential

visual appeal to a young child before purchase. The Panel, however, considered that the teddy bear was clearly visible and would cause the gift pack to have an appeal to under 18s. This appeal was reinforced by the overall appearance of the gift pack which, the Panel noted, was brightly coloured. The Panel considered that the inclusion of the sticker did not reduce the appeal of the product to under 18s except in so far as it partially obscured the teddy bear. The Panel noted that the gift pack was appearing in an environment in which it would be expected readily to be seen by under 18s, and concluded that the visual appeal of the gift pack was such that it would have a particular appeal to this audience. The Panel therefore concluded that the gift pack was in breach of Code paragraph 3.2(g).

ACTION BY COMPANY

The company said that the product was no longer on sale and that they would not produce gift packs for retailers in future which combined alcohol with a teddy bear.



Rubbel Sexy Lager

Brouwerij Huyghe, Belgium (Imported by Beer Paradise Ltd)

Final Decision: **19 March 2007**

COMPLAINT SUMMARY

"I would appreciate your assistance in determining whether this product breaches your code of practice particularly section 3.2 (d), (f), (g) and (h). In an informal conversation, the retailer mentioned that in Belgium this product is bought by the consumers who apparently drink the contents and then undress the variety of ladies."

COMPLAINANT

Buckinghamshire Trading Standards

DECISION

Under Code paragraph 3.2(d) **UPHELD**

Under Code paragraph 3.2(f), 3.2(g), 3.2(h)

NOT UPHELD

Neither the producer nor the importer responded to the complaint.

The Panel noted that the product label featured a young woman apparently wearing a swimsuit. The swimsuit, however, could be scratched off by the consumer to reveal the woman naked. The Panel

considered that both this feature and the product's brand name, "Rubbel Sexy Lager", suggested an association with sexual success and therefore caused the product to be in breach of Code paragraph 3.2(d). The Panel did not consider that the scratch and reveal feature encouraged immoderate or irresponsible consumption and hence did not find the product in breach of Code paragraph 3.2(f).

The Panel considered that the scratch and reveal feature would not cause the product to have a particular appeal to under-18s and therefore did not find the product in breach of Code paragraph 3.2(g).

The Panel considered that the young woman may have been under the age of 25 but that it was difficult to judge. They noted, however, that she was not drinking alcohol and nor did they consider there to be any suggestion that she had been drinking or was about to drink. They therefore did not find the product in breach of Code paragraph 3.2(h).

ACTION BY COMPANY

Beer Paradise said that they would stop importing the product.



Vodka-based RTD range

Asda Stores Ltd

Final Decision: **13 July 2007**

COMPLAINT SUMMARY

“A drink ... should not have a particular appeal to under 18s.”

COMPLAINANT

Member of the public, Lincolnshire

DECISION

Under Code paragraph 3.2(g) **NOT UPHELD**

The company said that the product range had been launched in November 2003 in 275ml format but that they had since increased the size of the bottle to 700ml, and hence the price at which it was sold, to reduce its potential appeal to under-18s. They were conscious of the Portman Group’s Code when the products were developed but were satisfied that the labels did not appeal to under-18s.

The Panel noted that two of the three flavours in the range were brightly coloured and that each flavour featured an image of a creature. It noted, however, that the images were merely outline drawings and considered that these were unlikely to carry a particular appeal to under-18s. It further considered that the flavour names were not of particular appeal to this age group. It therefore concluded that, despite the bright colours, the products overall should not appeal particularly to under-18s and did not breach Code paragraph 3.2(g).

ACTION BY COMPANY

None needed.



Pink Elephant

10 International

Final Decision: **30 July 2007**

COMPLAINT SUMMARY

“Pink elephants have for many decades been associated with drunkenness and hallucinations associated with excessive alcohol consumption or post drug taking, especially LSD symptoms.”

COMPLAINANT

Member of the public, London

DECISION

Under Code paragraph 3.2(a), 3.2(c) and 3.2(f)

NOT UPHELD

The company said that the product, a rosé wine, had been created to complement spicy foods such as Asian cuisine. The brand name had been decided on because it suggested the colour of the product (Pink) and carried a suitable association with Asia (Elephant). The Panel noted that a pink elephant was sometimes

associated with drunken or drug-related hallucinations. It considered, however, that this association was not obvious or widely-known. It noted that the company had not played on this association in any way in the packaging of the product or in its wider marketing. Instead, there was an alternative rationale for the choice of name and the product was presented in a sophisticated way. Provided that the company continued to avoid any marketing approaches that might allude to pink elephants in a hallucinogenic sense, the Panel was satisfied that the brand name should not be seen as emphasising the product's intoxicating effect or as associating the product with either illegal drugs or immoderate consumption. The Panel accordingly found the product not to breach Code paragraphs 3.2(a), 3.2(c) and 3.2(f).

ACTION BY COMPANY

None needed.



Iganoff Cannabis Flavoured Vodka

Beveland SA, Spain (Imported by Ultimate Brands Ltd)

Final Decision: **19 October 2007**

COMPLAINT SUMMARY

"[This product is] surely in clear breach of the code with, I feel, irresponsible and obvious illegal drug references."

COMPLAINANT

Publican, Bristol

DECISION

Under Code paragraph 3.2(c) **UPHELD**

The producer maintained that the product was marketed in accordance with the law. The Panel, however, was concerned that the word "cannabis", along with a visual of what appeared to be a cannabis leaf, featured prominently on the label. The Panel considered that this caused the product to have an association with illicit drugs and therefore found the packaging in breach of 3.2(c) of the Code.

ACTION BY COMPANY

Ultimate Brands Limited said that in light of the Panel's decision they would stop importing the product.



Perigan's Cannabis Flavoured Gin

Beveland SA, Spain (Imported by Ultimate Brands Ltd)

Final Decision: **19 October 2007**

COMPLAINT SUMMARY

"[This product is] surely in clear breach of the code with, I feel, irresponsible and obvious illegal drug references."

COMPLAINANT

Publican, Bristol

DECISION

Under Code paragraph 3.2(c) **UPHELD**

The producer maintained that the product was marketed in accordance with the law. The Panel, however, was concerned that the word "cannabis", along with a visual of what appeared to be a cannabis leaf, featured prominently on the label. The Panel considered that this caused the product to have an association with illicit drugs and therefore found the packaging in breach of 3.2(c) of the Code.

ACTION BY COMPANY

Ultimate Brands Limited said that in light of the Panel's decision they would stop importing the product.



Rodnik's Cannabis Flavoured Absinthe

Beveland SA, Spain (Imported by Ultimate Brands Ltd)

Final Decision: **19 October 2007**

COMPLAINT SUMMARY

"[This product is] surely in clear breach of the code with, I feel, irresponsible and obvious illegal drug references."

COMPLAINANT

Publican, Bristol

DECISION

Under Code paragraph 3.2(c) **UPHELD**

The producer maintained that the product was marketed in accordance with the law. The Panel, however, was concerned that the word "cannabis", along with a visual of what appeared to be a cannabis leaf, featured prominently on the label. The Panel considered that this caused the product to have an association with illicit drugs and therefore found the packaging in breach of 3.2(c) of the Code.

ACTION BY COMPANY

Ultimate Brands Limited said that in light of the Panel's decision they would stop importing the product.

Retailer Alert Bulletins

If a product's packaging or point-of-sale material is found in breach of the Code, the Portman Group takes compliance action by issuing a Retailer Alert Bulletin (RAB) asking licensees de-stock the offending product/materials after a specified three month period. RABs are published in the licensed trade press and on the Portman Group's website and are sent to Code Signatories, police licensing officers, Trading Standards Officers, local licensing authorities and other interested parties nationwide.

PRODUCT	RAB ISSUED	COMPLIANCE DEADLINE
Rubbel Sexy Lager	April 2007	19 June 2007
Range of Cannabis-flavoured drinks	December 2007	22 January 2008

How to make a complaint under the Code

Details of the complaints process are given in our 'Guide to Complaints' leaflet, available free of charge from the Portman Group (address and telephone number below). Copies of the Code of Practice are also available from the same address on request.

The Portman Group's Code of Practice encourages drinks producers to market their products responsibly. A product might contravene the Code if its name, packaging or marketing:

- does not make it clear that it's an alcoholic drink;
- appeals particularly to under 18s;
- emphasises the alcoholic strength unduly;
- links the product with illicit drugs;
- associates the product with sexual success;
- suggests bravado, violence, dangerous or anti-social behaviour;
- makes you think that drinking it will help you become popular or successful;
- encourages illegal or irresponsible drinking, such as binge drinking or drink-driving;
- uses inappropriate images of people under 25;
- suggests it can improve your mental or physical performance;
- urges consumers to drink rapidly or down their drinks in one.

The Code applies to a drink's packaging, (including its brand name) and also to point-of-sale activities and materials, brand websites, sponsorship, branded merchandise, press releases, advertorials and sampling.

If you wish to make a complaint under the Code, please write to the **Secretary to the Independent Complaints Panel** at the **Portman Group, 7-10 Chandos Street, London W1G 9DQ**.

If you would like to discuss any aspect of the complaints procedure, you are welcome to telephone **020 7907 3700**. Alternatively you can send an email to info@portmangroup.org.uk

The Independent Complaints Panel

The membership of the Independent Complaints Panel represents a diversity of background and experience and does not include any person employed by the Portman Group or by any of its member companies.

The Panel's procedures are set out in our 'Guide to Complaints' leaflet which is available from the Portman Group on 020 7907 3700. Each complaint is considered carefully on its own merits.



Sir Richard Tilt (Chairman)

Started his career in the Prison Service as Assistant Governor in 1966. He was Governor of a number of prisons including Bedford and Gartree. Appointed Director General of the Prison Service in 1995. Sir Richard retired from the Prison Service in 1999 and in the same year was appointed a Knight Bachelor.

From November 1999 – March 2000, he was Chairman of Kettering General Hospital NHS Trust, prior to taking up post as Chairman of Northamptonshire Health Authority in April 2000. In 2002 he was appointed chairman of Leicestershire, Northamptonshire and Rutland Strategic Health Authority. He was a member of the Sentencing Advisory Panel from 1999–2002.

In December 2000 Sir Richard was appointed as Social Fund Commissioner for Great Britain and Northern Ireland. He was appointed Chairman of the Social Security Advisory Committee with effect from 1 January 2005.



Jon Eggleton

Appointed to the role of United Biscuits UK Marketing Director in December 2003. Previously 15 years' experience within the drinks industry, most recently as a plc main board Marketing Director at HP Bulmer until October 2003. Prior to Bulmers, 11 years at Diageo/Guinness in a variety of marketing roles in the UK and overseas as Director of Marketing for Guinness Asia Pacific.



Callum Jacobs

Head of Personal, Citizenship and Health Education and also teacher of sociology and psychology at Cophthall School, a comprehensive secondary school in Barnet, London. Worked with Barnet Local Education Authority producing drug education resources for schools. Currently works with young people, specialising in drug and alcohol education.



Nigel Long

Non-executive advisor to Naked (communications strategy company), Partners Andrews Aldridge (relationship marketing company) and Harringtons. Previously over 20 years' experience in the advertising industry including the creative agencies WCRS and Partners BDDH where he was Managing Director from 1995 and Chairman & CEO from 2001. After 10 years, and having successfully completed the merger of Partners BDDH and Euro RSCG (to create the UK's 6th largest ad agency), Nigel left in March 2004 and took a six month sabbatical.

Panel members continued overleaf...

The Independent Complaints Panel



Barbara O'Donnell

Appointed National Alcohol Liaison Officer for Scotland in February 2002 with a remit to administer the Scottish Association of Alcohol Action Teams (now the Scottish Association of Alcohol and Drug Action Teams). Prior to this appointment Barbara managed the Scottish Executive and Health Scotland's public education campaign, Drinkwise, for five years. Currently a member of the Education Core Group of the International Council on Alcohol & Addictions.



Reverend Canon Professor Martin Percy

Principal of Ripon College Cuddesdon, Oxford. Also visiting Professor of Theology and Ministry, Hartford Seminary, Connecticut; Professor of Theological Education, King's College, London and Canon Theologian, Sheffield Cathedral. Since his ordination in 1990 has occupied academic posts at Christ's and Sidney Sussex colleges, Cambridge, the University of Sheffield and Lincoln Theological Institute for the Study of Religion and Society. Worked as Academic Advisor on the Spirit Zone project in the Millennium Dome and presently sits on the Church of England's Faith and Order Advisory Group.



Morven Proctor

Welfare Advisor at Liverpool John Moores' University Student Union. Former Women's Officer, National Union of Students Scotland. Former Vice-President (Welfare), Stirling University Students' Association.



Angela Sarkis CBE

An independent consultant with wide experience of voluntary organisations, the public sector, faith communities and charitable trusts. A BBC Governor since October 2002. Chairs the National Council for Voluntary Organisations Diversity Project and is a member of the Home Office Active Community Unit Advisory Panel and the Vice-President of the African Caribbean Evangelical Alliance. Currently a non-executive director on the Home Office Correctional Services Board. Former Chief Executive of the Church Urban Fund 1996–2002.

The Portman Group's Code Advisory Service

As part of its responsibility in operating the Code of Practice, the Portman Group offers a free, fast and confidential Advisory Service.

The service gives drinks producers, importers and retailers the opportunity to seek advice, in advance, about the packaging and below-the-line marketing of any pre-packaged alcoholic drink that is to be sold in the UK. This enables any concerns about any possible breaches of the Code to be discussed and dealt with at an early stage.

Seeking advice can help companies to avoid the expense and bad publicity of having to make changes in response to an upheld decision by the Panel in the event of a complaint.

Companies wishing to seek advice under the Code should contact **Kay Gill, Code Advice & Compliance Manager** on **020 7907 3706** or by email **kgill@portmangroup.org.uk** with details of their plans.

Over 140 companies have signed up to the Portman Group Code of Practice to indicate their support for the Code and their willingness to abide by and, in the case of retailers, help enforce, the decisions of the Independent Complaints Panel.

10 International Ltd	Fuller Smith & Turner plc	Meantime Brewing Company Ltd
Adnams plc	G T News Ltd	Merrydown plc
Alcohols Ltd	GBL International Ltd	Miller Brands (UK) Ltd
Ampleforth Abbey Trading Ltd	George Bateman & Son Ltd	Mitchells & Butlers plc
Arkell's Brewery Ltd	Gin & Vodka Association of Great Britain, The	Mitchells of Lancaster (Brewers) Ltd
ASDA Stores Ltd	Gray & Sons (Chelmsford) Ltd	MOB Ltd
Association of Licensed Multiple Retailers	Greene King plc	Morrells Brewery Ltd
Avery's of Bristol Ltd	Greenwich Distillers Ltd	National Association of Cider Makers, The
Babco Europe Ltd	H&A Prestige Packing Company Ltd	Nisa-Today's (Holdings) Ltd
Bacardi Martini	Halewood International Ltd	Northern Ireland Drinks Industry Group
Belhaven Brewery Co Ltd, The	Hall & Woodhouse Ltd	Oddbins Ltd
Beverage Brands (UK) Ltd	Harvey & Sons (Lewes) Ltd	Palmer & Harvey McLane Ltd
Black Sheep Brewery plc, The	Hayman Ltd	Pernod Ricard UK
Blackwood Distillers	Heavitree Brewery plc, The	Punch Taverns
Blavod Drinks Ltd	Hook Norton Brewery Co. Ltd	Rank Group
Booker plc	Hyde's Brewery Ltd	Refresh UK
British Beer & Pub Association	Ian Macleod Distillers Ltd	Rubicon Research Ltd
Brothers Drinks Co. Ltd	Icon Distillers UK	S A Brain & Co.Ltd
Brown Forman	InBev UK Ltd	Scotch Whisky Association, The
Bulmers Ltd	Intercontinental Brands (ICB) Ltd	Scottish & Newcastle plc
Cains Beer Company plc	Inver House Distillers Ltd	Sharp's Brewery
Caledonian Brewing Company Ltd, The	J Chandler & Co (Buckfast) Ltd	Shepherd Neame Brewery Ltd
Carlsberg UK	JC & RH Palmer Ltd	Shooters UK Ltd
Castle Brands Spirits Group GB Ltd	JD Wetherspoon plc	Somerfield Stores Ltd
Charles Wells Ltd	Jim Beam Brands Distribution UK	Speyside Distillers Co Ltd
Constellation Wines Europe Ltd	John E Fells & Sons Ltd	St Austell Brewery Co. Ltd
Continental Wine & Food Ltd	Joseph Holt plc	Timothy Taylor & Co.Ltd
Co-operative Group, The	J Sainsbury plc	Tesco Stores Ltd
Coors Brewers Ltd	JW Lees & Co (Brewers) Ltd	Test Tube Products Ltd
Costcutter Supermarkets Group Ltd	J Wray & Nephew (UK) Ltd	Thresher Group
Daniel Batham & Son Ltd	Kingsland Wines and Spirits	Universal Brand Ltd
Daniel Thwaites & Co. Ltd	Lanchester Wine Cellars Ltd	V & S Plymouth Ltd
DB Wines Ltd	Landmark Cash & Carry Ltd	Vickery Wines Ltd
De Vere Group plc t/a G & J Greenall	Laurel Pub Company	Wadworth & Co.Ltd
Diageo Great Britain	London & Scottish International Ltd	Waitrose Ltd
Drinks Group, The	Maclay Group plc	Wells & Youngs Ltd
Edrington Group, The	Majestic Wine Warehouses Ltd	Welsh Whisky Company Ltd, The
Ehrmanns Ltd	Marblehead Brand Development Ltd	WH Brakspear & Sons plc
Elgood & Sons Ltd	Marks and Spencer plc	Whiskynet
Enterprise Inns plc	Marston's Inns and Taverns	Whitbread Group plc
Everards Brewery Ltd	Marston's plc	Whitley Neill Ltd
F&B Partnership Ltd, The	Marston's Pub Company	Whittalls Wines Ltd
Felinfoel Brewery Co. Ltd, The	Martin Mccoll	Whyte & Mackay Ltd
First Choice Wholesale Foods	Matthew Clark Wholesale Ltd	Wine and Spirit Association, The
First Drinks Brands Ltd	Maxxium UK Ltd	Wm Morrison plc
Frederic Robinson Ltd	McMullen & Sons Ltd	Young & Co's Brewery plc



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