

Responsible Communication, Marketing, Sales & Public Relations Policy

Just Russel BV

Version: 1.0

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Review Date: 31/05/2027

Policy Owner: Marketing Lead

Approved by: Leadership Team

1. Purpose

Just Russel is committed to communicating honestly, transparently and responsibly with all stakeholders, in support of its mission to create healthier lives for pets and their people through personalized nutrition that is kind to our planet.

This Policy establishes the principles, requirements and governance mechanisms that guide all communication activities conducted by or on behalf of Just Russel.

The objectives of this Policy are to:

- build trust through accurate and transparent communication
 - support informed decision-making by customers and stakeholders
 - protect animal welfare and promote responsible pet ownership
 - prevent misleading, deceptive or irresponsible communications
 - support positive social and environmental impact
 - ensure compliance with applicable laws and regulations
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2. Scope

This Policy applies to all communication activities conducted by or on behalf of Just Russel, including:

- marketing and advertising
- sales communications

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- customer care communications
- public relations and media relations
- influencer and ambassador activities
- website, digital and social media content
- packaging, labelling and product information
- stakeholder and corporate communications

It applies to all products, services and markets in which Just Russel operates.

The requirements of this Policy also apply to external parties acting on behalf of Just Russel, including agencies, consultants, influencers, ambassadors, affiliates and other business partners.

3. Definitions

For the purposes of this Policy:

Claim

Any statement, representation, message or implication regarding a product, service, ingredient, nutritional benefit, environmental impact, animal welfare outcome, social impact or business practice communicated by or on behalf of Just Russel.

Approved Claim

A claim that has undergone the appropriate review process and has been approved for use in accordance with this Policy.

Significant Claim

A claim relating to health, nutrition, sustainability, environmental impact, animal welfare, social impact, comparative performance, or any claim that may create material legal, reputational or stakeholder risk.

Evidence

Information that supports the accuracy and validity of a claim, including but not limited to scientific literature, certifications, supplier declarations, internal analyses, expert opinions or documented business data.

External Representative

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Any individual or organisation communicating on behalf of Just Russel, including agencies, consultants, influencers, ambassadors, affiliates, contractors and other third-party partners.

PART I — COMMUNICATION PRINCIPLES

4. Communication Principles

All communications shall be:

Honest

Accurate, truthful and evidence-based.

Transparent

Clear about benefits, limitations and assumptions.

Respectful

Respectful towards all stakeholders and free from discrimination, manipulation or intimidation.

Responsible

Consistent with Just Russel's mission and long-term impact objectives.

Understandable

Accessible and understandable for the intended audience.

5. Brand Principles

All communications shall reflect the Just Russel brand values.

Expert

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Evidence-based and factually correct.

Authentic

Honest and transparent.

Accessible

Clear and easy to understand.

Playful & Human

Warm, relatable and centred around the relationship between pets and their people.

Confident

Clear and credible without exaggeration.

6. Principles for Claims

All claims used by Just Russel must be:

- evidence-based
- proportionate
- relevant
- clearly scoped
- transparent
- understandable
- capable of being substantiated if challenged

Claims must clearly indicate whether they relate to:

- a product
 - a service
 - a category
 - a specific initiative
 - the company as a whole
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PART II — COMMUNICATION REQUIREMENTS

7. Product, Nutrition & Health Communications

All product, nutrition and health-related communications must be supported by credible evidence.

Just Russel shall not:

- claim that products cure diseases
 - suggest veterinary treatments can be replaced by products
 - make unsupported nutritional claims
 - exaggerate health outcomes
 - present exceptional outcomes as typical outcomes
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8. Animal Welfare Communications

Animal welfare communications must be accurate, evidence-based and proportionate.

Just Russel shall not:

- exaggerate animal welfare outcomes
 - create unrealistic expectations regarding pet wellbeing
 - communicate animal welfare benefits that cannot be reasonably substantiated
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9. Sustainability, Environmental & Impact Communications

Just Russel is committed to preventing greenwashing, impact washing and other forms of misleading sustainability communication.

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Environmental, sustainability and impact-related communications must be:

- accurate
- evidence-based
- verifiable where appropriate
- proportionate
- transparent regarding assumptions and limitations

Claims must reflect actual practices, initiatives, outcomes and available evidence.

Anti-Greenwashing and Anti-Impact Washing Commitment

Just Russel will not communicate environmental, social or impact-related benefits that cannot be reasonably substantiated.

Communications regarding sustainability, social impact, responsible sourcing, animal welfare, community engagement or business impact shall be based on available evidence and presented in a balanced and transparent manner.

Prohibited Practices

Just Russel shall not:

- overstate environmental or social benefits
- use vague sustainability language without evidence
- omit material context
- communicate unsupported environmental, social or impact benefits
- selectively communicate positive impacts while omitting significant limitations
- imply that an initiative has a broader impact than can reasonably be demonstrated

Where appropriate, supporting evidence shall be maintained and made available.

10. Ethical Marketing

Marketing activities must support informed customer decision-making.

Marketing communications shall:

- accurately describe products and services
- present pricing transparently
- clearly disclose promotions and conditions
- avoid manipulation
- avoid exploiting emotional vulnerability

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11. Ethical Sales Practices

Sales activities shall prioritize transparency and customer trust.

Sales representatives shall:

- provide accurate information
- explain pricing and subscription conditions clearly
- explain cancellation procedures clearly
- respect customer autonomy

Pressure-selling, misleading information and artificial urgency are prohibited.

12. Customer Care Communications

Customer Care representatives shall:

- provide factual and accurate information
- communicate respectfully
- escalate specialised questions where appropriate
- handle complaints fairly and objectively

Customer complaints shall be used as input for continuous improvement.

13. Public Relations, Influencers & External Representatives

Individuals acting on behalf of Just Russel shall:

- communicate truthfully
- disclose paid partnerships where required
- use approved claims only
- comply with applicable advertising and consumer protection requirements

Just Russel reserves the right to terminate collaborations where these requirements are not

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respected.

14. Responsible Communication Practices

Data Protection

Personal data shall be collected, processed and stored in accordance with applicable privacy legislation and internal privacy policies.

Just Russel shall not sell customer personal data.

Protection of Vulnerable Audiences

Communications shall not exploit vulnerable individuals.

Special care shall be taken when communicating with:

- first-time pet owners
- customers seeking pet-health information
- individuals with limited digital literacy
- emotionally distressed customers

Communications must support informed decision-making rather than emotional pressure.

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PART III — GOVERNANCE

15. Claims Governance

Claims involving:

- health and nutrition
- sustainability and environmental impact
- animal welfare
- social impact
- comparative statements
- significant legal, reputational or stakeholder risk

require review before publication.

Only approved claims may be used in external communications.

Supporting evidence shall be retained where appropriate.

Evidence may include:

- scientific literature
- supplier declarations
- certifications
- internal analyses
- expert advice

Significant claims shall be documented in a central register or equivalent system.

Approved claims shall be reviewed periodically and at least every 2 years.

Claims that can no longer be substantiated shall be amended, suspended or removed.

Proportionality Principle

The level of review, documentation and oversight applied under this Policy shall be proportionate to the nature, scale and risk of the communication.

Routine communications may follow simplified review procedures.

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16. Reporting Concerns

Employees and stakeholders may report concerns regarding:

- misleading communications
- greenwashing
- impact washing
- unethical marketing practices
- misrepresentation
- breaches of this Policy

Reports may be submitted through available grievance or whistleblowing channels.

Retaliation against individuals raising concerns is prohibited.

17. Governance, Monitoring & Continuous Improvement

Leadership Team

Responsible for oversight of this Policy.

Marketing Lead

Responsible for implementation, claims governance and compliance monitoring.

Employees and Representatives

Responsible for complying with this Policy.

Training

Relevant employees and representatives shall receive appropriate guidance and training.

Monitoring

Just Russel will periodically review:

- customer complaints
- corrections and retractions

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- compliance incidents
- stakeholder feedback
- audit findings

Policy Review

This Policy shall be reviewed annually.

Continuous Improvement

Lessons learned from reviews, complaints, stakeholder feedback and audits shall be used to improve communication practices.

18. Commitment

Just Russel believes that responsible communication is essential for building trust, supporting animal wellbeing and creating long-term positive impact.

All individuals covered by this Policy are expected to uphold the principles outlined in this Policy.

Version History

Version	Date	Description
1.0	01/06/2026	Initial release

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