



Belmond Influencer Policy - Gifts and Discounts

This policy is relevant to any individual exerting influence over individuals via social media and other digital marketing platforms (“you”) and who, either directly with Belmond or via an intermediary such as a vendor or PR agency:

1. is gifted (or accepts a discount on) a Belmond trip;
2. is invited to a Belmond event,

(the “Belmond Experience”).

In this policy, any reference to “Belmond” includes reference to the Belmond brand, products, and services, and any hotel, train, cruise, restaurant or safari owned and/or operated by the Belmond group from time to time (please refer to [Belmond.com](https://www.belmond.com) for details of current Belmond properties).

Belmond neither requires you to post on social media about your Belmond Experience nor does Belmond require you to use a specific label if you do decide to post. However, if you do choose to post, we recommend that you familiarise yourself with any applicable laws and regulations that apply, such as:

- **Social Media Platform Terms:** most social media platforms have their own terms of use, such as the Instagram Community Guidelines and the Facebook Community Standards;
- **UK:** the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing and the UK Code of Broadcast Advertising (the CAP Codes), or their replacement codes from time to time, as issued by the UK Committee of Advertising Practice; Guidance issued by the UK Advertising Standards Authority (ASA), including but not limited to the 'Influencer's Guide' (available at <https://www.asa.org.uk/resource/influencers-guide.html>); Guidance issued by the UK Competition and Markets Authority (CMA), including but not limited to the social media endorsements guide to compliance (available at <https://www.gov.uk/government/publications/social-media-endorsements-guide-for-influencers/social-media-endorsements-being-transparent-with-your-followers>); and the Consumer Protection from Unfair Trading Regulations 2008 (CPRs);
- **US:** the Federal Trade Commission’s “Guides Concerning the Use of Endorsements and Testimonials in Advertising” (available at <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-publishes-final-guides-governing-endorsements-testimonials/091005revisedendorsementguides.pdf>), “Native Advertising: A Guide for Business” (available at <https://www.ftc.gov/tips-advice/business-center/guidance/native-advertising-guide-businesses>), and “Disclosures 101 For Social Media Influencers” (available at https://www.ftc.gov/system/files/documents/plain-language/1001a-influencer-guide-508_1.pdf);
- **France:** the legal provisions applicable to advertising on the internet, including without limitation Articles L121-1 and L132-2 of the Consumption Code; the Guidelines issued by the Autorité de Régulation Professionnelle de la Publicité (ARPP), in particular those available at <https://www.arpp.org/infographie-a-destination-des-influenceurs-sur-les-regles-de-transparence-en-matiere-de-marketing-dinfluence/>; and Article 20 of the “Loi sur la Confiance dans l’Economie Numérique” of 21 June 2004;
- **Italy:** the Italian Competition Authority (ICA) guidelines, provided for in decision no. 27787; Digital chart regulation on the identifiability of commercial communication distributed through the Internet published by the Italian Advertising Self-regulatory Institute; the Self-regulatory Code on Commercial Communication published by the Italian Advertising Self-regulatory Institute; the Italian Consumer Code; and the Italian Intellectual Property Code;
- **Germany:** the German Act against Unfair Competition (*Gesetz gegen den unlauteren Wettbewerb*); German Interstate Broadcasting Agreement (*Rundfunkstaatsvertrag*) and German Telemedia Act (*Telemediengesetz*); and the Guidance issued by the German Centre for Protection against Unfair Competition (*Wettbewerbszentrale*) including the Guide to labeling advertising on Instagram (*Leitfaden zur Kennzeichnung von Werbung auf Instagram*): <https://www.wettbewerbszentrale.de/media/getlivedoc.aspx?id=36690>; and
- **Other:** any equivalent or similar law, regulation, code or guidance applicable to influencer marketing in the jurisdiction in which you are based or where your target audience are based (for example, in some countries there may be a requirement to post disclosures in the local language).

If you do decide to post, it is likely that you will need to make the nature of your relationship with Belmond clear, for example, in the case of a gifted Belmond trip, in the UK you could use the caption: “Thank you to my friends at Belmond for gifting me this trip” so that it is clear to your audience that you did not pay for the trip. You should also comply with all other regulator guidance on making social media postings.