



THG

Responsible
Marketing
Code
2026



Introduction

THG PLC is a global retailer and brand owner, headquartered in Manchester, UK, operating through two leading predominantly online consumer businesses: THG Beauty and THG Nutrition.

We are committed to being a business that has a positive impact on both the communities and the environment in which we operate.

As part of this, we recognise the importance of implementing responsible marketing practices across the Group and believe that having strong guidance and frameworks in place will ensure we deliver on our commitments.

That's why we have developed this document, to guide our employees, brands, customers and partners on responsible marketing and advertising. By following the THG Responsible Marketing Code, we can ensure we comply with relevant local, national and international marketing standards, laws, and regulations. This includes being guided by industry self-regulatory best practices, drawing from the [International Chamber of Commerce's \(ICC\) Advertising and Marketing Communications Code](#).

The scope of our Responsible Marketing Code covers all forms of marketing communications across THG and extends to our external media partners. It applies globally, and covers all THG employees, contractors and sub-contractors, including third-party marketing agencies and influencers.

The Responsible Marketing Code accounts for activities that are intended to promote products or inform customer behaviour. This means we take into consideration every aspect of the product lifecycle from ideation to the sale of products to our end consumers and includes, but is not limited to, promotions, sponsorships, packaging, websites, influencer marketing, social media, responsible use of Artificial Intelligence (AI), direct or digital marketing and communications. We will ensure to have adequate security measures in place regarding the sensitivity of personal data, to prevent unauthorised access to, or the disclosure of, personal data. In addition, THG will ensure that those who collect personal data on our behalf have an adequate privacy policy in place, the terms of which will be readily available to consumers. THG's own privacy policy can be viewed [here](#).



THG

The Group

Across the Group, we promise that our marketing communications will:

- ✦ Comply with all applicable global and local laws, regulations, and industry standards, ensuring that communications are always honest, truthful and not misleading, regardless of the product category or market in which we operate.
- ✦ Adhere to recognised international frameworks for responsible marketing, ensuring compliance with global and local standards for product safety, quality and ethical considerations. This includes, but is not limited to, regulations governing health, environmental and sustainability claims.
- ✦ Ensure that all claims, including those related to health, performance, nutrition, sustainability and ethics, are supported by credible scientific research, validated testing, certification, verified user experience or measurable performance metrics. These claims will meet or exceed the standards set by applicable global and local regulations.
- ✦ Commit to marketing practices that are transparent, ethical and aligned with evolving regulatory requirements and best practices for responsible communication, ensuring that all product claims reflect current standards in consumer protection, sustainability and product integrity.



- ✦ Continuously review and update our marketing communications to remain compliant with changing regulations and global best practices, ensuring that we uphold the highest standards of responsibility across all markets and product categories.
- ✦ Ensure every testimonial, endorsement, or supportive documentation we refer to is genuine, verifiable and relevant.
- ✦ All marketing communications are age-appropriate and aren't misleading or harmful to the audience.
- ✦ Respect human dignity and will not incite or condone any form of discrimination, including that based upon ethnic or national origin, religion, gender, age, disability or sexual orientation.
- ✦ Ensure AI tools used to enhance the customer experience when employed for customer engagement, i.e. chatbots or personalised recommendations are regularly reviewed to ensure results continue to be appropriate and add value.
- ✦ Ensure that AI tools and algorithms are developed with no negative biases and are regularly audited to avoid inadvertently favouring or discriminating against any demographic/group.
- ✦ Follow all relevant environmental and ethical guidance and standards when making green claims, to ensure transparency and appropriate substantiation.

1. AI algorithms developed will allow for personalisation as part of normal trading behaviour

THG Nutrition

THG Nutrition, led by Myprotein, the world's largest online sports nutrition brand, spans multiple health and wellness categories, delivering its products both directly to consumers and through strategic offline partnerships worldwide.

Across THG Nutrition, we promise that our marketing communications will:

- ✳️ Ensure health, nutrition, performance and sustainability claims are supported by scientific research, testing, certification, verified user experience or measurable performance metrics and will adhere to the applicable codes and standards².
- ✳️ Be transparent and set the standard for how we write about, display, label and promote our products (including promotion transparency) by always accurately and realistically showing any material characteristics advertised, ensuring customers can make informed decisions.
- ✳️ Provide clear explanations of the functional benefits of our products, including our clothing.
- ✳️ Avoid actively marketing to children and young people³.
- ✳️ Be responsible in encouraging healthy intentions and have an inclusive representation across all cultures, ethnicities, shapes, sizes and abilities. We will take an 'athlete first' approach to model casting to ensure real authentic moments are captured and championed.
- ✳️ Strive to reflect real life moments by capturing mid-motion and reflect the real face of effort and associated sweat.
- ✳️ When applicable to our own imagery, not make editorial material changes to a person's shape, size, proportion, skin, hair or eye colour. Including enhancement of lighting, colour balance, or contrast of an image.
- ✳️ Strive to use inclusive and empowering language within our marketing material.
- ✳️ We will not use AI-generated imagery (synthetic humans) to make claims about our nutrition products or services.
- ✳️ Responsibly use influencers and ambassadors, ensuring they share our values and comply with our ethical marketing practices. This includes transparency around sponsored content and substantiated claims.

² Abide by the provisions contained in the International Chamber of Commerce Framework for Responsible Food and Beverage Marketing Communications for our consumable products. All claims will adhere to the Nutrition and Health Claims Register, Recycled Claim Standard, & Global Organic Textile Standard/Organic Content Standard and applicable country standards.

³ As defined by the Advertising Standards Authority, a child as anyone under 16 (<https://www.asa.org.uk/advice-online/children-targeting.html>)



THG

THG Beauty

THG Beauty operates prominent online platforms including Lookfantastic, Cult Beauty and Dermstore, offering a valued route to market for over 1,000 third-party brands, alongside a specialist portfolio of owned brands.

Across THG Beauty, we promise that our marketing communications will:

- ★ Make truthful and evidence-based claims and not mislead our customers by providing educational information about the products and claim.
- ★ Be fair and transparent when labelling and promoting products (including promotion transparency) enabling our customers to make informed choices.
- ★ Use appropriate age marketing and not encourage misleading or harmful messages on habits for children and young people including beauty routines.
- ★ Strive to be responsible and inclusive in our approach to casting models and promote products that cater to a range of hair, skin types and tones.
- ★ Be mindful of cultural differences and avoid perpetuating harmful beauty standards or stereotypes.
- ★ When applicable to our own imagery (and encouraged for our brand partners), not make editorial material changes to a person's shape, size, proportion, skin, hair or eye colour including enhancement of lighting, colour balance or contrast of an image.
- ★ Strive to avoid depicting unrealistic or unattainable standards of beauty i.e flawless, poreless, digitally altered skin, hair and bodies; or strive to showcase a broad and multi-faceted representation of people, faces, skin, hair, and body types.
- ★ Strive to use inclusive and empowering language when describing skin/hair/body concerns or conditions.
- ★ Be transparent about the use of any human-appearing AI that may impact the efficacy of the product being promoted.
- ★ Responsibly use influencers and ambassadors, ensuring they share our values and comply with our ethical marketing practices. This includes transparency around sponsored content and substantiated claims.
- ★ Avoid greenwashing or scaremongering and strive for concrete and reliable certifications.
- ★ Follow the environmental and ethical standards of this code when making green claims.



Standards

Environmental & Ethical

Our claims will always be substantiated and with appropriate data and evidence.

We need to ensure our sustainability claims comply with internal processes and the latest public guidance. Therefore, it is mandatory for all employees who develop, write, or publish these claims to complete the required training and read THG's Green Claims Guidance.

We require our supply chain partners to adhere and comply with THG's Supply Chain Standards [[THG_Supply_Chain_Standards.pdf](#)]

Training and Compliance

We are committed to the effective adoption of the Responsible Marketing Code.

All THG employees will be made aware of this policy. Completion of associated training will be mandatory for all employees working within our marketing and brand teams, and compliance with training will be monitored internally.

We will continue to monitor regularly consumer, customer and employee feedback on our marketing.

Discipline for non-compliance

Any violation of the Responsible Marketing Code will be taken seriously and assessed on a case-by-case basis and by reference to the relevant facts. Violations of THG policies may result in disciplinary action. Procedure for investigation of any alleged violations will be in accordance with THG's disciplinary policies and procedures.

THG's leadership team is expected to epitomise this code and provide the necessary guidance and support to their team members, allowing them to comply with the provisions of the Responsible Marketing Code.

