

# STOCK



**MARKETING  
COMUNICATION**  
POLICY

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# INTRODUCTION

At Stock Spirits Group (“Group”), we bring together outstanding local spirits brands from various countries under one roof. Our purpose is “enhancing the flavours of life” by offering great products so that all good things in life can be enjoyed, savoured, and shared in moderation and responsibly. Our products are only for adults, and we communicate in a responsible manner with adult consumers about our products, as we put adult European consumers at the heart of our business.

Responsible alcohol consumption is a vital part of the Stock Spirits Group ESG strategy with clear commitments that include e.g. an educational internet platform for all interested in the topic, active engagement in educational programs promoting responsible drinking in the local spirits associations, innovating with non and low alcoholic variants to offer choice to consumers, and transparent consumer information incl. responsibility icons so consumers can make informed choices.

## OUR 3R APPROACH IS BASED ON THREE KEY PILLARS:



**RESPONSIBLE  
CONSUMER MARKETING**



**RESPECTING  
CONSUMER CHOICE**



**RESPONSIBLE  
DRINKING**

We are committed to marketing and advertising our products responsibly within the laws, codes of practice and voluntary agreements of the countries in which we operate. In markets where the legal requirements are less stringent than Stock Spirits Marketing Policy (“SSMP” or “Policy”), we shall apply principles set out in this SSMP. We fully support the prevention of underage access to alcohol and minimum age restrictions for the legal sale or purchase of alcoholic beverages.

In accordance with our rules set out in the Stock Spirits Group’s Code of Conduct, we apply this Policy to our marketing activities, in particular consumer advertising, promotional materials and promotion activities for our products across our Group companies.

We are committed to supporting responsible consumption of our products while cultivating a culture in which our employees are role models of responsible consumption, and, through leading by example, we encourage others to do the same.

All Group companies, employees and anyone working on our behalf (including all advertising, promotion, and research agencies and any other organisations engaged in consumer marketing for our products) shall adopt this SSMP in good faith.

**Nicolas Mazuranic, CMO  
Stock Spirits Group**

# CHAPTER 1



## OUR 3R APPROACH

# CHAPTER 1

## Our 3R Approach

OUR **3R** APPROACH IS BASED ON THREE KEY PILLARS:



RESPONSIBLE  
CONSUMER MARKETING



RESPECTING  
CONSUMER CHOICE



RESPONSIBLE  
DRINKING

### 1. RESPONSIBLE CONSUMER MARKETING



#### WE SHALL:

- market our products only in consumer advertising/promotional materials and activities which are aimed at adult consumers;
- ensure all claims we make are true, plausible and can be substantiated; illustrate and describe our products in a fair and honest way that will not mislead our adult consumers.

#### WE DO NOT:

- encourage immoderate consumption of our products;
- make claims that the consumption of alcoholic products is safe.

## 2. RESPECTING CONSUMER CHOICE



### ✓ WE SHALL:

- innovate to offer consumers low and non-alcoholic variants;
- include transparent consumer information on pack or online so consumer can make an informed choice.

### ✗ WE DO NOT:

- encourage anyone to become a consumer of our products or stop being an abstainer;
- discourage existing consumers from ceasing consumption if they choose to do so.

## 3. RESPONSIBLE DRINKING



### ✓ WE SHALL:

- play a key role in supporting responsible consumption of our products.

### ✓ WE DO:

- cultivate a culture where our employees serve as role models for responsible consumption; and, through leading by example, encourage others to do the same.



## DEFINITIONS & SCOPE

### DEFINITIONS

#### ADULTS ONLY

A person aged 18 years or over, unless a higher minimum age for the lawful sale, purchase, possession, or consumption of alcoholic beverages is specified by local law or voluntary agreement (self-regulation). If a higher minimum age is specified by local law, the term “adult” means a person of at least that specified minimum age.

#### ADVERTISEMENT / ADVERTISING

Any publicly available consumer advertising/promotional materials, activities and events which are aimed at encouraging adult consumers to select one brand over another. For the avoidance of doubt, the following are excluded from this definition:

- Communications between Group companies and the relevant trade (trade communications);
- Images of products, brands, packaging, or advertising
  - (a) in corporate communications (such as Annual Reports and Accounts) and/or
  - (b) for purposes of historical interests;
- Group companies’ corporate websites intended to communicate company information, rather than promote products;
- User generated content (including texts, pictures and videos) that has been created not by the Group (and/or its representatives), if such content is published on a website outside of the control of the Group;
- Product packaging;
- Product branding on price lists or other similar forms of communication designed to convey pricing information to consumers.
- Marketing communication to closed groups of customers or to customers who passed the age verification.

#### AGE VERIFICATION

Any verification mechanism which confirms that a consumer is an adult. See appendix 1.

#### ALCOHOLIC BEVERAGES

Any product that contains a certain percentage of alcohol by volume. These beverages may include, but are not limited to, beer, wine, spirits, and other alcoholic drinks. Legal definitions can vary from one country to another, and sometimes even within regions of a country.

#### DIGITAL MARKETING

The promoting of brands or products and services via a digital medium using technologies/electronic devices such as computers, tablets, smartphones, cell phones and digital billboards.

<b>GROUP COMPANY/ COMPANIES</b>	All companies within Stock Spirits Group.
<b>LEGAL REQUIREMENTS</b>	Local laws, local/national countries' codes of practice and/or voluntary agreements governing our Products.
<b>LEGAL REQUIREMENTS</b>	Local laws, local/national countries' codes of practice and/or voluntary agreements governing our Products.
<b>MINIMUM LEGAL AGE ("MLA")</b>	Legal purchase age for alcohol, or 18 where there is no set legal purchase age, or where it is lower than 18.
<b>NON-ALCOHOLIC BEVERAGES</b>	Beverages that do not contain alcohol. Non-alcoholic beverages are generally those with an ABV (Alcohol by Volume) of 0.5% or lower. Legal definitions can vary from one country to another, and sometimes even within regions of a country.
<b>PRODUCTS</b>	Alcoholic beverages.
<b>PROMOTIONAL EVENTS &amp; ACTIVITIES</b>	<p>Ranges of events and activities undertaken by the Group companies which are created specifically to raise awareness of a particular brand or brands of Products amongst adult consumers, and which would not take place without the support of Group companies.</p> <p>These do not include:</p> <ul style="list-style-type: none"> <li>• pre-arranged events for which the organisers subsequently sought Group companies' support and whose continued success does not rely solely on Group companies. This exception is applicable only if there is no promotion of Product brands occurring during these events; or</li> <li>• corporate events and activities where no Products' brand promotion is intended.</li> </ul>
<b>REMINDERS ON RESPONSIBLE DRINKING ("REMINDERS")</b>	Links to the local Drink Responsibly Initiatives.



**RESPONSIBILITY  
ICONS**

Three icons or responsible drinking symbols illustrating that alcohol is not for underaged, discouraging consumption during pregnancy and discouraging drinking and driving.

**SPONSORSHIP**

An event, activity, or team to which Group companies provide support in order to raise awareness of a particular Product brand or brands amongst adult consumers, but without whose support the event, activity or team would still exist or take place.

**STAND-ALONE  
NON-ALCHOLIC  
PRODUCT**

Non-alcoholic products distinct from our current products.

**YOUTH**

Anyone who is not an adult.

This Policy applies to all products and brands of Stock Spirits Group, alcoholic and non-alcoholic. It covers communication across various channels, such as digital, broadcast, print, cinema, outdoor advertising, billboards, product placement, point of sale materials, sponsorships, PR, influencer collaborations, promotions, brand innovation, product development, and third-party channels managing communications for our brands. The Policy's comprehensive scope emphasizes its significance in governing diverse aspects of brand representation.

# CHAPTER 2



## **RESPONSIBLE CONSUMER MARKETING**



# CHAPTER 2

## Responsible Consumer Marketing

### ADULTS ONLY



#### ✓ WE SHALL:

- focus on adults only, and
- prepare and position our marketing content for an adult audience, ensuring it is not created or positioned in a manner that primarily appeals to individuals below the legal age for purchasing alcohol, and
- only portray and associate the brand with people who are, reasonably appear to be, and are portrayed as over 25 years of age, and
- avoid associating our brands with the attainment of, or 'rites of passage' to adulthood, and
- use technology in digital media to target adult audiences and prevent access by those below the MLA.

#### ✗ WE DO NOT:

- target consumers younger than the legal age with our Promotional activities and events, Advertising or other marketing activities, and
- place ads near schools, except at licensed premises, with sensitivities near religious buildings also taken into consideration,
- employ any image, symbol, language, gesture, music, cartoon character, person, sports/entertainment celebrity, hero, or promotional prize or gift that is designed to primarily appeal to individuals below the MLA, and
- grant licenses for our brand names, logos, or trademarks for use on children's clothing, toys, games, games equipment, or any other materials intended primarily for individuals below the MLA, and
- sponsor sports, celebrities or events that appeal primarily to people younger than the MLA.

#### Clarification:

Our spirits and other alcoholic products are exclusively meant for individuals who have reached the legal drinking age. Consequently, our marketing communications must be designed to resonate with adults and this principle extends to non-alcoholic versions of alcoholic brands as well.

While certain countries may establish the MLA for the purchase of alcoholic beverages that is below 18, or may not impose any legal purchasing age restrictions at all, Group companies adhere to a policy that strictly avoids directing our marketing efforts toward individuals below the age of 18. In regions where the legal purchasing age

exceeds 18, we are committed to refraining from targeting our marketing initiatives towards individuals below that specified age.

We do not craft and execute our Promotional events and activities in the on/off-trade sector in a manner that targets or presents our brands primarily to individuals below the MLA. The age of all individuals engaged in promoting our brands in on/off-trade activities must be at least MLA or above. This rule applies to consumer research activities, ensuring that individuals conducting research related to our brands in the on/off-trade sector are of the MLA or older.

Where allowed by local laws, we shall advertise in media, events, and third-party websites only if at least 70% of the audience is reasonably expected to be older than the MLA. Regular monitoring of media audience composition shall be conducted to maintain the highest practical level of compliance.

## TRANSPARENCY

### WE SHALL ALWAYS:

- list all mandatory information on labels of our products, and
- provide information about the alcohol content of our brands, and, even if not mandatory in a given market, list ingredients and provide energy information per 100 ml and/or per serving on product label or online (website, QR code, etc.),
- include Reminders, and, by end of 2027, three Responsibility icons (responsible drinking symbol of age restriction, discouraging consumption during pregnancy, drinking and driving) or their equivalents on the labels of our products. The age restriction icon should also be included on the alcohol-free extensions of a brand to send a clear message that minors should not consume alcohol.

### WE DO NOT:

- produce or promote any alcoholic beverages that contain excessive amounts of substances that provide a stimulating or invigorating effect.

### Clarification:

Customers are entitled to be informed about the contents of our Products. We consistently work on providing details regarding ingredients, alcohol content, and the nutritional values of our beverages on either our packaging or online platforms. The central focus or primary appeal of any marketing or product innovation must never revolve around high alcohol strength or potency.

## CREDIBILITY



### WE SHALL ALWAYS:

- communicate legally, truthfully, and respectfully, and
- ensure that no piece of information has a double meaning.



### WE DO NOT:

- imply that lower-strength alcohol beverages may be consumed in ways or situations that would be inappropriate with higher strength beverages,
- communicate in misleading or confusing way, or use claims that have no real and verifiable basis, and
- suggest that mid or lower strength beverages can be consumed in quantities, manners, or settings deemed inappropriate for higher strength beverages, and
- imply that mid or lower strength beverages are healthier or more responsible choices.

### Clarification:

Our spirits often play a role in social gatherings. Guided by our purpose to enhance the flavours of life, we bear the responsibility to adhere to legal, truthful, and ethical communication.



# CHAPTER 3



## **RESPECTING CONSUMER CHOICE**

# CHAPTER 3

## Respecting Consumer Choice

### ABSTINENCE

#### WE SHALL:

- always respect consumer choice.

#### WE DO NOT:

- pressure anyone to drink.

#### Clarification:

We recognize that there are instances in each person's life when it might be unwise to consume alcohol. We understand that some individuals opt out of partaking in drinking altogether, citing various reasons such as cultural or religious beliefs.

We are committed to honouring these personal choices and staying attuned to local values and sensitivities.

We pledge not to portray abstinence or moderate alcohol consumption in a negative light or insinuate that refusal to drink is wrong or foolish, even if such portrayal is humorous.

### RESPECT & PROPER BEHAVIOUR

#### WE SHALL ALWAYS:

- follow commonly accepted modern ideas of what is proper, and
- show awareness and respect of local and cultural differences.

#### WE DO NOT:

- ignore both local and global characteristics of various societies, e.g. their traditions, customs, beliefs, etc.

#### Clarification:

We need to think about marketing plans not just from the viewpoint of the people we are trying to reach, but also from the perspective of the larger community, both locally and globally, where the Group companies operate.

Our marketing should not use themes that might seem okay in one place but could seriously upset people in another market or culture. We always want our marketing to be respectful and considerate of differences such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, or gender.

When possible, we shall actively support diversity and inclusion and avoid using stereotypes in our marketing. Our marketing must not indicate or depict any abuse and sexual harassment as we do not tolerate it, including that aimed towards or coming from our employees and third-party agency staff promoting our brands in outlets.

## NON-ALCOHOLIC BEVERAGES



### ✓ WE SHALL ALWAYS:

- respect our 'Adults Only' rule when promoting Non-alcoholic beverages, and
- be transparent and clearly inform consumers about non-alcoholic and alcoholic variants of our brands.

### Clarification:

As we want to offer choice to our consumers, we are developing non-alcoholic versions of our brands. In cases where we craft or distribute a stand-alone non-alcoholic brand, meaning a product distinct from / not-related to our current alcoholic brand but being a non-alco version of the alco category e.g. stand-alone non-alco gin or vodka, we do follow the same guiding principles as in case of alco-products.

### ✗ WE DO NOT:

- sell non-alcoholic versions of our brands in children's or youth institutions, as well as on other premises explicitly designated for those below the MLA, such as schools;
- target our non-alco products to:
  - (a) pregnant women**, we always avoid targeting communications toward pregnant women or depicting pregnant women consuming our non-alcoholic products;
  - (b) overtly dangerous situations.** We avoid linking our non-alcoholic products with overtly dangerous or violent situations, such as extreme sports or operating heavy machinery;
  - (c) driving**, we cannot portray non-alcoholic products as a responsible choice for drivers.

In case of sports - we may promote non-alcoholic products in connection with sport activities, including combat and extreme sports, under the condition that the product is presented in a positive context and after the sport activity is definitely finished.



# CHAPTER 4



## **RESPONSIBLE DRINKING**

# CHAPTER 4

## Responsible Drinking

...Moderation & Safety & Effects...

### MODERATION



#### ✓ WE SHALL ALWAYS:

- Reminders on responsible drinking while emphasising moderation and safety,
- incorporate responsible drinking Reminders on product labels.

#### ✗ WE DO NOT:

- portray, endorse, or encourage excessive or irresponsible drinking, and refrain from making any positive references to the effects of intoxication.

### Clarification:

Our purpose of „enhancing the flavours of life” guides our marketing to consistently promote responsible drinking, moderation, and the enjoyment of our Products only as elements of a balanced lifestyle.

Our promotions prioritize responsible drinking for adults, discouraging excessive consumption. We strictly avoid depicting heavy (binge) or rapid drinking, intoxication, or suggesting that such behaviours are attractive or appropriate. Our brands shall not be promoted in a way which is not in line with our commitment to moderation and enjoyment.

We do not endorse promotions involving speed drinking games or excessive alcohol consumption and discourage the promotion of rapid or multiple shot consumption. We avoid supporting activities, packaging, or drink delivery ideas that hinder consumers from understanding and controlling their alcohol consumption.

Research participants shall not be encouraged to drink excessively or irresponsibly. If such behaviour is observed, they will be excluded from the research, and appropriate information on responsible drinking will be provided.

If defined in the local industry self-regulation, clearly visible Reminders on responsible drinking are mandatory in all alcohol brand above-the-line advertising, including TV, radio, outdoor, digital, and print. These Reminders are encouraged for below-the-line marketing as appropriate. The format, size, and placement of Reminders must be appropriate to the advertisement, ensuring they are distinct from mandatory information, readily visible, and readable to consumers. Formats such as audible voice-overs and dynamic online banners are acceptable. Adapted Reminders must be consulted with Legal and/or Public Affairs and must take into consideration government-mandated health messages and warnings in certain markets.

All our activities, whether they involve Group companies' websites, Promotional activities, or Sponsorships, must include a link to the local Drink Responsibly Initiatives or an educational webpage.

Stock Spirits Group's commitment is to place three Responsibility icons (on MLA, safe driving, pregnancy) on its Products' labels.



**WE SHALL ALWAYS:**

- portray drinking in safe and appropriate circumstances,



**WE DO NOT:**

- portray or suggest any association with anti-social or illegal behaviour;
- portray or suggest any association with violence
- depict the act of drinking before or while driving motor vehicles, operating machinery, or engaging in any comparable activity or situation, and
- associate consumption of alcohol with tobacco or nicotine products, gambling and any illegal activities.

We may promote our products in connection with sport activities, including combat and extreme sports, under the condition that the product is presented in a positive context and after the sport activity is definitely finished.

**Clarification:**

Alcohol consumption can impact inhibitions and decision-making, posing risks in specific situations such as driving or operating hazardous machinery. Consequently, it is crucial to refrain from linking the consumption of our products to potentially dangerous activities or other situations where it may be unsafe or imprudent.

Our marketing shall not imply that drinking is acceptable before or during activities requiring high alertness or physical coordination. Adults may be shown enjoying a drink after sports or certain activities, as long as it's completely clear the activity will not resume. The same rule is applicable to non-alcoholic brands.

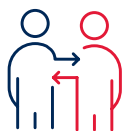
Our marketing shall not endorse or imply any connection to anti-social behaviour, nor depict illegal consumption or association with explicit or implicit illegal activities related to alcohol beverages.

We shall ensure our marketing avoids any portrayal or suggestion of association with violence and refrain from trivializing or glamorizing violent situations. Our brands shall not be associated with any activity promoting harm or violence, including harm to animals and nature.

We strictly prohibit the portrayal or endorsement of tobacco and nicotine products, including smoking or vaping activities. We do not offer tobacco or nicotine products as promotional gifts or prizes, nor do we sponsor tobacco/nicotine-related events, nor participate in joint marketing activities or consumer-facing promotions involving tobacco/nicotine products.

Careful consideration of local sensitivities is required when deciding whether to associate our brands with gambling.

## EFFECTS



### ! WE SHALL ALWAYS AVOID:

- implying any positive effects on energy, endurance, mood, or state resulting from alcohol consumption, and
- implying that alcohol might contribute to weight management or be a component of a fitness regime, and
- suggesting that individuals should consume beverages with low(er) calorie or carbohydrate content in excessive quantities.

### ✗ WE DO NOT:

- suggest that our alcohol brands provide consumers with any health, therapeutic, dietary, functional, or performance advantages, and
- depict or suggest that drinking is essential for achieving social or other success, overcoming inhibitions, or gaining social acceptance, and
- convey or imply that drinking enhances sexual attractiveness or is a prerequisite for sexual success or improves masculinity, and
- depict or target pregnant women.

### Clarification:

Although our products can be portrayed as a pleasurable aspect of socializing, our marketing communications should refrain from implying that consuming alcohol contributes to personal, social achievements or acceptance. It is necessary to avoid insinuating that the success of a social gathering depends on the consumption of alcoholic beverages or that such drinks provide health or performance benefits.

We do refrain from endorsing alcohol as a medicinal remedy and will not suggest that alcohol possesses the capacity to prevent, treat, or cure any human disease or condition. Additionally, we do abstain from utilizing gifts, drinking vessels, or cocktail names that carry medical or pharmaceutical connotations in the promotion of our brands.

Our Products should not primarily appeal based on health, sexual, or similar functional benefits. If utilizing ingredients with perceived qualities, we use only necessary quantities for specific flavour. While mentioning these ingredients in packaging and promotions is allowed, no claims (explicit or implied) about health or functional benefits are permitted.

We do not market our Products as energy drinks or suggest they provide energy or endurance benefits. No advertising must imply alcohol consumption enhances stamina or boosts energy. When co-promoting with an energy drink, we treat it neutrally, avoiding energy claims and carefully choosing imagery.

Our Products may be associated with relaxing occasions, but we do not suggest they cause changes in energy, alertness, or enhance relaxation. They are not marketed as thirst-quenching or hydrating, and no implication of replacing alcoholic beverages with Non-alcoholic ones should be made. Permissible claims about nutritional qualities, ingredients, or production methods must be accurate, substantiated, and health-neutral where legally allowed.

Marketing materials may depict attractive or affluent individuals, suggesting brand preference as a mark of discernment or good taste, but may not imply that drinking is necessary for success in social, professional, educational, athletic, or financial aspects, or as a solution to problems or inhibitions.

Products may be portrayed in social or romantic settings, but marketing avoids implying that drinking enhances sexual attractiveness or is necessary for sexual success. Implicit sexual activity, seduction scenarios, gender stereotyping, and inappropriate prizes or gifts that may breach the spirit of these provisions must all be avoided.

### **Our Responsible Drinking Commitment**

Our responsible drinking commitments are defined and listed in the Stock Spirits Group ESG strategy. We are committed to continually raising awareness of the consequences of inappropriate alcohol consumption. We collaborate with diverse stakeholders to promote responsible drinking and combat alcohol misuse, addressing issues like drunk driving, drinking during pregnancy, breast-feeding or taking care of minors, excessive and underage drinking, and irresponsible serving of alcohol.

We urge the Group companies to create consumer initiatives or cooperate within existing ones to effectively raise awareness and reduce alcohol-related harm.



# CHAPTER 5

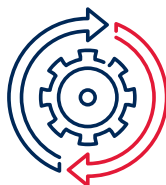


**COMPLIANCE**

# CHAPTER 5

## Compliance

...Awareness is key...



### COMPLIANCE

This Policy represents a set of fundamental standards for all Group companies and brands. Adherence to these standards is obligatory for all individuals representing our Company and/or brands, including employees and contractors. Compliance encompasses both explicit requirements and underlying principles. While the Policy establishes our best standards, it is imperative to prioritize stricter local regulations when applicable.



### AWARENESS

We believe that awareness is key. Our marketing teams must undergo comprehensive and regular training in this Policy, either using online e-learning or face-to-face sessions. Periodic annual training sessions are mandatory. Agencies and/or business partners must be made aware of the SSMP at the beginning of their cooperation with the Group companies. Our standards are non-negotiable and must be a part of all relevant agency contracts.



### BACKUP

Local teams, either Legal or Public Affairs, are ready to help in interpreting the SSMP and navigating local legislation. Two heads are better than one. We follow the **four eyes principle**. It is advisable to consult any activities early in the development of marketing communications. Uncertainty or suspected non-compliance should be promptly escalated to relevant departments.

## RESPONSIBILITIES

**DATE OF LAST REVIEW** November 2024

**EXCOM** Responsible for Policy approval.

**CHIEF MARKETING OFFICER** Policy owner responsible to ExCom for marketing communication issues.

**LOCAL MARKETING DIRECTOR** Responsible for ensuring that this Policy is implemented and adhered to, and that all relevant employees are made aware of the Policy and its requirements.

**LOCAL BRAND OWNER** Responsible for implementing the standards of the SSMP in all marketing materials and activities.

**LOCAL LEGAL OR PUBLIC AFFAIRS MANAGER** Responsible for verifying marketing materials against legal requirements/stakeholder views/industry standards.

**CHIEF LEGAL COUNSEL** Joint final decision-maker in the event of escalation.

**GROUP CORPORATE COMMUNICATION & PUBLIC AFFAIRS** Joint final decision-maker in the event of escalation.

**MANAGEMENT, EMPLOYEES, AND BUSINESS PARTNER OF THE GROUP COMPANIES** Responsible for adhering to this Policy.



## APPENDIX 1 – AGE VERIFICATION METHODS

### General principles

It is mandatory to implement an age verification mechanism wherever possible. This ensures that the content is appropriately restricted based on the viewer's age.



#### Instagram

Configure the page settings to establish a minimum age requirement for users to view the page and its content (MLA and older).



#### Facebook

Configure the page settings to establish a minimum age requirement for users to view the page and its content (MLA and older).



#### Website

Incorporate an age gate where visitors must confirm if they are of the MLA or older before accessing any brand or campaign website.



#### Youtube

Mark the channel and each video as age-restricted to viewers older than the MLA.



#### Tik Tok

Alcohol brands face significant restrictions on the platform, including a prohibition on advertisements. Due to these limitations, it is recommended not to establish accounts for our brands, but rather to engage with audiences through influencers.



#### Non-addressable media

Ensure from the outset that any non-addressable media channels, including linear TV, radio, and influencers, reach at least 70% of an adult audience.

**STOCK**

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NOVEMBER 2024