American Licorice Company CFBAI Commitments
(June 2017)

ENTITY COVERED
American Licorice Company, 1900 Whirlpool Drive SE, La Porte, IN, 46350

KEY CONTACT
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PRODUCTS COVERED BY PLEDGE COMMITMENTS
All products sold by American Licorice including: Red Vines®, Fruit Vines®, Sour Punch®, Punchies® and Super Ropes® candy.

IMPLEMENTATION
American Licorice first implemented the commitments described below on May 1, 2015. This pledge reflects the company’s movement from a 35% to a 30% audience threshold standard for measured media. This means that the company will consider an advertising to be primarily directed to children under age 12 and thus covered by these commitments when children ages 2-11 constitute at least 35% of the expected audience at the time of the media buy.

Company Values
American Licorice values the opportunity to communicate with consumers (age 12 and older) about the company’s products and wishes to do so respectfully and responsibly. Our consumer communications seek to be honest in the portrayal of our products’ attributes. Confectionary products are not a replacement for balanced meals, and our consumer messaging reflects this. Further, in the interest of forthrightness, nutrition information for a representative sampling of our products is published on the corporate website.

As part of our commitment to responsible marketing, American Licorice consumer communications:

- Will not showcase violent or offensive behavior. In addition, communications efforts will not encourage discrimination on the basis of gender, race, religion or political affiliation. Where appropriate, we will use consumer communications to foster beneficial values and behaviors, including honesty, integrity, respect, playfulness, community and friendship.

- Will, where appropriate, encourage active lifestyles and healthy eating choices. Further, consumer communications will not disparage the pursuit of an active lifestyle or healthy eating choices.

- Will feature reasonable portion sizes for the situation depicted.
• Will not show children under the age of 12 to promote confectionery products unless accompanied by adults or unless images are submitted as part of user-generated content.

As part of our commitment to responsible marketing, American Licorice consumer communications, American Licorice also is proud to be a member of the Children’s Food & Beverage Advertising Initiative (CFBAI), the Children’s Advertising Review Unit (CARU) and the Alliance for Family Entertainment (AFE). As a CFBAI participant, American Licorice will not advertise its products to children under age 12 in media covered by the Initiative as described below.

Pledge
As a CFBAI participant, American Licorice agrees to uphold the Core Principles of the Initiative, specifically:

1. American Licorice will not advertise its products in:
   a. Measured media, where the composition of the under 12 audience is estimated to be at least 30% of the total audience at the time of the media buy, including on TV, radio Internet (third-party websites), and print (such as National Geographic for Kids);
   b. Other media primarily directed to children under 12, including:
      1. Company-owned websites;
      2. Video and computer games that are rated “Early Childhood” or “EC,” which are inherently primarily directed to children under age 12, and other games that are age-graded on the label or packaging as being primarily directed to children under age 12;
      3. DVDs of movies that are rated “G” whose content is primarily directed to children under age 12, and other DVDs whose content is primarily directed to children under age 12;
      4. Mobile Media and Word of Mouth. American Licorice will not engage in advertising that is primarily directed to children under age 12 on cell phones, smart phones, tablets, other personal digital devices, and through word of mouth.

2. American Licorice will not advertise its products in primary and secondary schools, unless it falls into the exceptions enumerated by the CFBAI’s Core Principles, such as charitable fundraising activities, sponsorship programs, or informal gifts or donations to elementary schools.

3. American Licorice will not pay for or actively seek to place its foods or beverages in the program/editorial content of any medium primarily directed to children under age 12 for the purpose of promoting the sale of those products.

4. American Licorice will not use third-party licensed characters, celebrities or movie tie-ins in measured media, where the composition of the under 12 audience is estimated to be at least 30% of the total audience or in other media primarily directed to children under 12.

5. American Licorice will not use its products in any interactive game that is primarily directed to children under age 12, which is provided free or at nominal charge (in any format).

The Company’s associates, advertising and promotional agencies and media buying agencies
have been instructed to comply with this pledge commitment.

1 American Licorice acknowledges that it has voluntarily lowered its threshold composition rate for measured media to 30%, which is a more restrictive threshold than required by the CFBAI.
2 American Licorice acknowledges that CFBAI may consider a company-owned or third-party website child-directed even if reliable visitor or viewer demographics are not available based on a multifaceted analysis, including factors such as an assessment of the target audience according to the media plan, where else the food is advertised, actions taken to restrict child access, such as age-screening, and the overall impression of the site’s content.