

**Revised: December 2015**

**Council of Better Business Bureaus  
Children's Food and Beverage Advertising Initiative  
Burger King Corp.'s Pledge**

**Entity Covered by Pledge:** Burger King Corp.  
5505 Blue Lagoon Drive  
Miami, FL 33126

**Name of individual(s) responsible for Overall implementation of the Pledge:**

Eric Hirschhorn, CMO North America

**Brand/Product Line Covered by Pledge:** BURGER KING® food and beverages.

BURGER KING® restaurants for more than 50 years have been serving menu offerings that represent quality, value, and taste. Our guests have always had the opportunity to customize their menu choices to meet their individual tastes, preferences and lifestyles. At Burger King Corporation ("BKC"), we remain committed to offering great tasting food our guests love while using product innovation as a vehicle to develop more menu options that promote a balanced diet. Through our Pledge to the Children's Food and Beverage Advertising Initiative of the Council of Better Business Bureaus ("CFBAI") and under the Enhanced Core Principles of the CFBAI (effective January 1, 2010, except where otherwise noted), we will communicate messages about our great tasting menu to help promote balanced diet choices among our younger customers.

**Our Pledge:**

➤ **Advertising Commitment<sup>1</sup>**

**1. No Targeting of Advertising to Children Under 6 years old**

- BKC will not purchase advertising time or space in television, radio, print and Internet venues primarily directed to children under 6 years old. This includes child-directed content, such as television programming during kids-block times or other television programs primarily directed to children under 6, and print publications (like National Geographic Kids, etc.) or Internet sites whose content is principally aimed at children under 6 years of age.<sup>2</sup>

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<sup>1</sup> BKC's associates, advertising, promotion and media-buying agencies have been instructed to comply with this advertising commitment and BKC's media-buying agencies will make adjustments to media buys periodically to reflect this advertising commitment.

<sup>2</sup> For purposes of this commitment, BKC will not purchase time or space in television or radio dayparts, or print or Internet venues, where the composition of the under-6 audience at the time the media is purchased is estimated to exceed 30% of the total audience. This standard will apply to the expected audience over the entire season in which a television program or program block is aired, understanding that audience demographics can vary from week to week from estimates at the time the media is purchased. To measure audience

## 2. Advertising in Measured Media

- **National Television, Radio, Print & Internet Advertising:** One hundred percent (100%) of National Television Advertising<sup>3</sup>, National Radio Advertising,<sup>4</sup> National Print Advertising<sup>5</sup> and National Internet Advertising<sup>6</sup> that is primarily aimed at children under 12 is restricted to BK® Kids Meals that meet the CFBAI Uniform Nutrition Criteria set forth on Appendix A. This includes child-directed content, such as television programming during kids-block times or other television programs primarily directed to children under 12, and print publications or Internet sites whose content is principally aimed at children under 12.<sup>7</sup>
- **BKC Websites:** One hundred percent (100%) of advertising on all food pages of BKC websites that are directed primarily to children under 12 is restricted to BK® Kids Meals that meet the CFBAI Uniform Nutrition Criteria.

## 3. Child-Directed Content:

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demographics BKC will use AC Nielsen ratings for Television; Mediamark Research Inc. for Print; Arbitron for Radio; and AC Nielsen or ComScore for Internet.

<sup>3</sup> "National Television Advertising" shall include any television commercial message paid for and approved by Burger King Corp. and its affiliates that is disseminated to all or substantially all of the United States and measured in National Gross Rating Points at the time the advertising is purchased.

<sup>4</sup> "National Radio Advertising" shall include any radio commercial message paid for and approved by Burger King Corp. and its affiliates that is disseminated to all or substantially all of the United States and measured in National Gross Rating Points at the time the advertising is purchased. Based on Arbitron-reported audience data for radio.

<sup>5</sup> "National Print Advertising" shall include any print commercial message paid for and approved by Burger King Corp. and its affiliates that is disseminated to all or substantially all of the United States and measured in impressions at the time the advertising is purchased. National Print Advertising does not include: point of purchase materials (i.e., menus, tray liners, signs, packaging, table tents, etc.). Based on Mediamark Research Inc. reported readership data.

<sup>6</sup> "National Internet Advertising" on third party websites shall include any Internet commercial message paid for and approved by Burger King Corp. and its affiliates that is disseminated to all or substantially all of the United States. Based on average, annual total visitor data as reported by ComScore or AC Nielsen ratings for the Internet.

<sup>7</sup> For purposes of this commitment, "primarily direct to children under 12" or "principally aimed at children under 12" refer to time or space in television or radio day-parts, or print or Internet venues, where the composition of the under-12 audience at the time the media is purchased is estimated to exceed 30% of the total audience. This standard will apply to the expected audience over the entire season in which a television program or program block is aired, understanding that audience demographics can vary from week to week from estimates at the time the media is purchased.

- **Video and Computer Games:** BKC will not advertise in video and computer games that are rated "Early Childhood" or "EC" that are inherently directed primarily to children under 6 years old. One hundred percent (100%) of advertising on video and computer games that are inherently directed primarily to children under 12, and other games that are age-graded on the label or packaging as being primarily directed to children under 12, will feature Kids Meals that meet the CFBAI Uniform Nutrition Criteria.
  - **Movie DVDs:** BKC will not advertise in or on movie DVDs that are rated "G" or "PG" whose content is primarily directed to children under 12.
4. **Mobile Media and Word of Mouth:** BKC will not direct advertising to children under 6 via cell phones, PDAs, or through word of mouth marketing. One hundred percent (100%) of BKC's advertising directed primarily to children under 12 via cell phones, PDAs, and through word of mouth,<sup>8</sup> is restricted to Kids Meals that meet the CFBAI Uniform Nutrition Criteria.
  5. **In-Restaurant Promotion:** One hundred percent (100%) of advertising via In-Restaurant Merchandising<sup>9</sup> for BKC's Kids Meals will include a BK® Kids Meals or an individual side dish or beverage item that meet the CFBAI Uniform Nutrition Criteria. For example, In-Restaurant Merchandising materials, such as BK® Kids Meal bags, could feature a promotional toy with an image of BK® Kids Meal or an approved side dish or beverage item that meet the CFBAI Uniform Nutrition Criteria.
  6. **Use of Licensed Characters, Celebrities and Movie Tie-In Commitment:** BKC will not use third-party licensed characters, celebrities (including athletes) and movie tie-ins to advertise in any measured media (Television, Print, Radio, Internet) where 30% or more of the total target audience (viewers, visitors, etc.) is under 6. The use of third-party licensed characters, celebrities (including athletes) and movie tie-ins is restricted to Kids Meals that meet the CFBAI Uniform Nutrition Criteria during (1) any program where more than 30% of the total audience is under 12; and (2) any program that falls within time periods traditionally regarded as "kids' viewing time (as designated by media providers) regardless of the size of the child viewing audience."<sup>10</sup>

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<sup>8</sup> The commitment regarding word of mouth advertising refers to advertising where a participant provides incentives (financial or otherwise), product samples or other support to individuals or groups who are not employees to promote consumption of branded food or beverage products or to promote discussion of such products and the advertising is primarily directed to children under 12.

<sup>9</sup> "In-Restaurant Merchandising" means the following: in-restaurant commercial messages at BURGER KING® restaurants that are printed on those merchandising elements specifically designated as Kids Meal Merchandising materials, which may include Door Decals, Under Counter Banners, Permanent Merchandising Unit (PMU) Posters, Kids Meal bags, Kids crowns, and Drive Thru Translites (i.e. merchandising elements at the point of order on drive thru menu boards that feature Kids Meal menu promotions and graphics). In-Restaurant Merchandising does not include: menus/menu boards or packaging (other than Kids Meal bags).

<sup>10</sup> Pursuant to the core principles set out in Children's Food and Beverage Advertising Initiative, the above commitment does not apply to (i) the use of licensed characters on

7. **Product Placement Commitment:** BKC will not approve, pay for, or actively seek the placement of BURGER KING® food or beverage products in the program/editorial content of any medium in the United States primarily directed to children under 12 years old<sup>11</sup> for the purpose of promoting the sale of these products.
8. **Interactive Games Commitment:** BKC will not approve, pay for or actively seek the placement of BURGER KING® food or beverage products in any of our own and/or any third party interactive game in the United States directed primarily to children under 6 years old. BKC does not approve, pay for or actively seek the placement of BURGER KING® food or beverage products in any of our own and/or any third party interactive game in the United States directed primarily to children under 12 unless such food and beverage products are Kids Meals that meet the CFBAI Uniform Nutrition Criteria.<sup>12</sup>
9. **Advertising in Schools Commitment:** BKC does not advertise our food or beverage products in elementary schools (pre K – sixth grade).<sup>13</sup>

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packaging, provided the packaging does not appear in advertising directed to children under 12 years old; and (2) the use of company-owned characters.

<sup>11</sup> The foregoing commitment does not apply to any local product placement activities engaged in by independent franchisees of Burger King Corp.

<sup>12</sup> The foregoing commitment does not apply to any local activity engaged in by independent franchisees of Burger King Corp.

<sup>13</sup> The foregoing commitment does not apply to any local activity engaged in by independent franchisees of Burger King Corp. Further, pursuant to the core principles set out in Children's Food and Beverage Advertising Initiative, the above commitment does not apply to displays of food and beverage products, charitable fundraising activities, public service messaging, or items provided to school administrators.

➤ **Supporting Data for the Advertised Kids Meal**

BKC has adopted the CFBAI Uniform Nutrition Criteria for Category 10 (Meals) for its advertised Kids Meals.<sup>14</sup> BKC now offers three meals that meet the CFBAI Uniform Nutrition Criteria and will continue to enhance the Kids Meal menu with products that meet the CFBAI Uniform Nutrition Criteria.

**1. BK® Advertised Kids Meals**

- **Hamburger with MOTT’S® Natural Applesauce and CAPRI SUN® 100% Apple Juice.**

The BURGER KING® Hamburger Kids Meal contains two full serving of fruit. MOTT’S® Natural Applesauce provides 1 serving of fruit. 1 pouch of CAPRI SUN® 100% Apple Juice contains 1 ½ servings of fruit. Each pouch provides ¾ cup fruit juice, which is 1 ½ servings of fruit according to the U.S Dietary Guidelines. As part of a well-balanced diet, eat a variety of fruit every day and be sure to make most of your fruits whole fruit.

- **Hamburger with MOTT’S® Natural Applesauce and Fat Free Milk.**

The BURGER KING® Hamburger Kids Meal contains one full serving of fruit and one serving of dairy. MOTT’S® Natural Applesauce provides 1 serving of fruit. The 8-ounce serving of Fat Free Milk is an “excellent source” of calcium and a “good source” of potassium (35 percent and 12 percent, respectively).

- **4-pce Chicken Nuggets with MOTT’S® Natural Applesauce and Fat Free Milk.**

The BURGER KING® Chicken Nuggets Kids Meal provides one full serving of fat free dairy and a full serving of fruit. MOTT’S® Natural Applesauce provides 1 serving of fruit. The 8-ounce serving of Fat Free Milk is an “excellent source” of calcium and a “good source” of potassium (35 percent and 12 percent, respectively).

**2. Side Item and Beverage Advertising Commitment**

BKC advertises four Kids Meals that are compliant with the CFBAI Uniform Nutrition Criteria. Each of the meals features an individual side dish or beverage item that meets CFBAI Nutritional Criteria. Either the approved Kids Meal or the approved side dish (applesauce) or beverage item is featured in 100 percent (100%) of Burger King Corp.’s advertising primarily directed to children under 12.

**3. Nutritional Support**

In addition to being part of the nutritionally-compliant Kids Meal, the approved individual side dish and beverage items help promote the consumption of fruit and fat-

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<sup>14</sup> The CFBAI Uniform Nutrition Criteria for Category 10 (Meals) can be found on Appendix A. Supporting nutritional information for Kids Meals can be found on Appendix B.

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free milk, two of the six food groups that are recommended by the Dietary Guidelines for Americans 2010 as “Nutrition Components to Encourage.”<sup>15</sup>

These foods are recommended because they are generally under-consumed by the American population, including children, and are likely to provide important health benefits to most Americans.

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<sup>15</sup> U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans*, 2010. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010.

**Appendix A**  
**Children's Food and Beverage Advertising Initiative**  
**Uniform Nutrition Criteria**  
**Category 10: Meals Consisting of an Entrée and Other Items Including a Beverage<sup>16</sup>**

- No more than 600 calories per meal;
- Less than or equal to 10 percent of calories from saturated fat;
- Less than or equal to 20/15g total sugars (See Notes);
- No more than 740 milligrams of sodium; and
- Greater than or equal to 2 servings F/V/D/WG; or greater than or equal to 1 ½ servings of F/V/D/WG and greater than or equal to 10% DV of three essential nutrients.

Notes: Meals must meet FDA/USDA definition for meals. Sugars from one qualifying milk/milk substitute, or qualifying yogurt/yogurt-type product, or qualifying fruit (i.e. w/o added sugars) or qualifying F/V juice are not counted in the 20g total sugars limit. When two qualifying items are present, the sugars from both items are not counted in the total sugar limit, but the limits (to account for all other items) are reduced to 15g for meals. All other nutrients to limit criteria for meals (calorie, sat fat, and sodium limits) must be met.

F: Fruit, V: Vegetable, D: Dairy, WG: Whole grains

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<sup>16</sup> The scientific and governmental standards upon which the CFBAI Uniform Nutrition Criteria is based are set forth in the "*White Paper on CFBAI's Uniform Nutrition Criteria*" (July 2011) found at <http://www.bbb.org/us/storage/16/documents/cfbai/CFBAI-Category-Specific-Uniform-Nutrition-Criteria.pdf>

**APPENDIX B  
BURGER KING® Kids Meal Nutritional Values**

The following charts set forth the nutritional values of the seven compliant BKC Advertised Kids Meals:

Meal 1:

| CFBAI Uniform Pledge Guidelines |              | ≤ 600      | ≤ 10%             | ≤ 20g  | ≤ 740mg     | ≥ 2 servings of F/V/D/WG |
|---------------------------------|--------------|------------|-------------------|--|-------------|--------------------------|
| Hamburger Meal                  | Serving Size | Calories   | Saturated Fat (g) | Total Sugar (g)                                    | Sodium (mg) |                          |
| Hamburger                       | 100g         | 230        | 3                 | 6  | 460         | NA                       |
| MOTT'S® Natural Applesauce      | 111g         | 50         | 0                 | 0*   | 0           | Fruit                    |
| Capri Sun 100% Apple Juice      | 177 ml       | 80         | 0                 | 0*   | 25          | 1.5 Fruit                |
| <b>Total</b>                    |              | <b>360</b> | <b>3</b>          | <b>6</b>   | <b>485</b>  | <b>YES</b>               |
| <b>Percent of Calories</b>      |              |            | <b>7.50%</b>      | <b>* does not include sugars from F/D servings</b> |             |                          |

The **Hamburger Kids Meal** with MOTT'S® Natural Applesauce and CAPRI SUN® 100% Apple Juice:

- The total calories provided by the meal are 360
- Approximately 7.5% of the calories are from saturated fat
- The total sugar content is approximately 6g
- The sodium content of the meal is 485mg
- The meal contains 2 nutrition components to encourage: 2.5 servings of fruit.

Meal 2:

| CFBAI Uniform Pledge Guidelines |              | ≤ 600      | ≤ 10%             | ≤ 20g  | ≤ 740mg     | ≥ 2 servings of F/V/D/WG |
|---------------------------------|--------------|------------|-------------------|--|-------------|--------------------------|
| Hamburger Meal                  | Serving Size | Calories   | Saturated Fat (g) | Total Sugar (g)                                    | Sodium (mg) |                          |
| Hamburger                       | 100g         | 230        | 3                 | 6  | 460         | NA                       |
| MOTT'S® Natural Applesauce      | 111g         | 50         | 0                 | 0*   | 0           | Fruit                    |
| Fat Free Milk                   | 8 oz         | 90         | 0                 | 0*   | 125         | Dairy                    |
| <b>Total</b>                    |              | <b>370</b> | <b>3</b>          | <b>6</b>   | <b>585</b>  | <b>YES</b>               |
| <b>Percent of Calories</b>      |              |            | <b>7.29%</b>      | <b>* does not include sugars from F/D servings</b> |             |                          |

The **Hamburger Kids Meal** with MOTT'S Natural Applesauce and Fat Free Milk:

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- The total calories provided by the meal are 370
- Approximately 7.29% of the calories are from saturated fat
- The total sugar content is approximately 6g
- The sodium content of the meal is 585mg
- The meal contains 2 nutrition components to encourage: 1 serving of fruit and one serving of dairy.

Meal 3:

| CFBAI Uniform Pledge Guidelines |                  | ≤ 600      | ≤ 10%             | ≤ 20g  | ≤ 740mg     | ≥ 2 servings of F/V/D/WG |
|---------------------------------|------------------|------------|-------------------|--|-------------|--------------------------|
| 4 pc Chicken Nuggets Meal       | Serving Size (g) | Calories   | Saturated Fat (g) | Total Sugar (g)                                    | Sodium (mg) |                          |
| 4 pc Chicken Nuggets            | 70               | 190        | 2                 | 0  | 360         | NA                       |
| MOTT'S Applesauce               | 111g             | 50         | 0                 | 0*   | 0           | Fruit                    |
| Fat Free Milk                   | 8 oz             | 90         | 0                 | 0*   | 125         | Dairy                    |
| <b>Total</b>                    |                  | <b>330</b> | <b>2</b>          | <b>0</b>   | <b>485</b>  | <b>YES</b>               |
| <b>Percent of Calories</b>      |                  |            | <b>5.45%</b>      | <b>* does not include sugars from F/D servings</b> |             |                          |

The **4 piece Chicken Nuggets Meal** with MOTT'S Applesauce and Fat Free Milk:

- The total calories provided by the meal are 330
- Approximately 5.45% of the calories are from saturated fat
- The total sugar content is approximately 0g
- The sodium content of the meal is 485mg
- The meal contains 2 nutrition components to encourage: fruit and dairy servings.