

Children's Food and Beverage Advertising Initiative General Mills Pledge

December 16, 2013

General Mills is pleased to submit its restated Pledge to The Children's Food and Beverage Advertising Initiative (the CFBAI). The CFBAI is a voluntary self-regulation program currently comprised of 18 of the largest food and beverage companies in the United States. By advancing and hastening a shift in the mix of messaging to encourage healthier dietary choices and healthy lifestyles in advertising to children under 12, the CFBAI represents a significant step forward. General Mills is proud to be a charter member of the CFBAI and is fully supportive of its goals. As an industry leader, General Mills is committed to maintaining the highest standards for responsible advertising to children. The scope and breadth of our Pledge to the CFBAI demonstrates General Mills' continuing commitment to high standards and to providing clear leadership on this important issue. This restated Pledge is consistent with our previous CFBAI pledges.

A. Identifying Information

1. *The corporate name and address of the Participant.*

General Mills Inc.
Number One General Mills Boulevard
Minneapolis, MN 55426
Phone: 763-764-7600
Fax: 763-540-4925
Web Site: generalmills.com

2. *The name and contact information of an individual(s) responsible for overall implementation of the Pledge.*

Mark Addicks
Senior Vice President, Chief Marketing Officer
mark.addicks@genmills.com
763.764.7819

3. *The name of the specific entity or entities covered by the Pledge.*

General Mills Marketing, Inc.

4. *The name of each brand and/or product line that is covered by the Pledge.*

See the attached General Mills Product List.

B. Core Principles

- **General Mills will only advertise products in compliance with CFBAI Category-Specific Uniform Nutrition Criteria to children under 12**

The CFBAI has developed Category-Specific Uniform Nutrition Criteria for foods that will be advertised to children under 12 (“CFBAI Nutrition Criteria”). As of December 31, 2013, only products that meet the CFBAI Nutrition Criteria will be advertised in media primarily directed to children under 12.

This commitment applies to all of the following types of media: television, radio, print, internet (i.e., third-party websites and company-owned websites), mobile, video and computer games rated “Early Childhood” or “EC,” and other video/computer games that are age graded on the label or packaging as being primarily directed to children under 12, DVDs of G rated movies that are primarily directed to children under 12, and other DVDs whose content is primarily child directed, cell phones and PDAs, and word-of-mouth advertising when it is primarily directed to children under 12.

- **General Mills will only use licensed characters, celebrities, and movie tie-ins in connection with products marketed to children under 12 that meet the CFBAI Nutrition Criteria**

General Mills will only use third-party licensed characters, celebrities (including athletes), and movie tie-ins in advertising primarily directed to children under 12 in connection with products that meet the CFBAI Nutrition Criteria.

- **General Mills will only include products that meet the CFBAI Nutrition Criteria in interactive games and features.**

General Mills will include only products that meet the CFBAI Nutrition Criteria in interactive games and features primarily directed to children under 12.

- **General Mills will not engage in product placement**

Regardless of the nutritional profile of the product, General Mills will not pay for or actively seek to place products in the program or editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products.

- **General Mills will not advertise in Schools.**

Regardless of the nutrition profile of the product, General Mills will not advertise any product in schools, pre-K through 12th Grade.

- **General Mills will not target any advertising to preschool children.**

Regardless of the nutrition profile of the product, General Mills will not advertise any product in any medium primarily directed to children under six years of age.

- **General Mills will continue to reinforce positive, healthy lifestyle choices.**

General Mills will continue to build positive messages into its advertising to further the goals of the CFBAI and to continue to provide consumers with additional nutrition information about our products. It is our goals to help families and children address health and wellness issues by focusing on three key steps to healthier living:

-- **BALANCE:** encourage families and children to understand and follow nutritional guidelines for a balanced diet of healthy and nutritious foods.

-- **MODERATION:** encourage families/children to eat sensible portions of food at any one sitting and throughout each day – we will never depict or encourage over-consumption.

-- **EXERCISE:** advocate and reinforce the importance of higher levels of physical activity.

- **General Mills will continue its tradition of charitable activity focused on healthy lifestyle choices.**

General Mills will continue its tradition of charitable activity focused on healthy lifestyle choices. For example, the General Mills Foundation's Champions for kids initiative helps promote nutrition and fitness through a variety of programs and partnerships. The initiative has reached nearly 1 million youth with over \$5 million in support to non-profit organizations across the United States since 2002.

C. *The criteria General Mills uses to determine whether advertising is primarily directed to children under 12*

- **Measured Media**

For all measured media, we will follow a key benchmark historically used by the Children’s Advertising Review Unit (CARU): any program where 35% or more of the total viewing audience is under 12 years of age will be considered “children’s advertising.”¹

Audience demographic calculations will be measured in media impressions primarily directed to specific demographic groups at the time the advertising is purchased, as determined by AC Nielsen ratings for TV and Internet, SRI Research (SRI) for radio, and Simmons and MRI (Mediamark Research Inc.) data for print. Our commitment will be calculated separately for each advertising medium.

- **Summary Table: Measured Media**

Medium	Audience Composition	Measurement of Audience Composition	Criteria for Brands Permitted to Advertise
Television	35% or greater is under 12	AC Nielsen Ages 2-5, 6-12 (issued monthly)	Meet CFBAI Nutrition Criteria
	35% or greater is under 6	AC Nielsen Ages 2-5 (issued monthly)	Not allowed
Print	35% or greater is under 12	Simmons and/or MRI Ages 6-11 (issued 2x per year)	Meet CFBAI Nutrition Criteria
Radio	35% or greater is under 12	SRI Research Ages 6-11 (issued 2x per year)	Meet CFBAI Nutrition Criteria
Internet	35% or greater is under 12	AC Nielsen Ages 6-11 (issued monthly)	Meet CFBAI Nutrition Criteria
	35% or greater is under 6	AC Nielsen Ages 2-11 plus content subject matter to estimate (issued monthly)	Not allowed

¹ The Company also uses the 35% benchmark to determine audiences under 6.

- **Company-owned websites or micro-sites**

It is difficult to measure audience composition on the Internet without implementing complex tracking mechanisms. For this reason, if the content of one of our own sites is targeted to children under 12, we will assume that 100% of the traffic is coming from children under 12.

Content primarily directed to children under 12 will be determined based on a number of factors, including the content's subject matter, format, projected audience demographics, and the composition of the audience to which the site is advertised.

Additionally, General Mills will continue to operate in full compliance with the Children's Online Privacy Protection Act's (COPPA) requirements.

D. General Mills treatment of interactive games and activity breaks

General Mills will allow only products that meet the CFBAI Nutrition Criteria to be incorporated into interactive games provided free or at nominal charge, in whatever form (online, disk or otherwise), primarily directed to children under 12.

In addition, websites and interactive games sponsored by General Mills and primarily directed to children under 12 will include a 30-minute "activity break," pausing the activity to encourage children to engage in another "more active" activity. Links to external health-oriented sites that meet CARU guidelines (e.g. presidentschallenge.org) will be provided where feasible. Games will reinforce our Balance, Moderation and Exercise strategy, and will never advocate, encourage or depict excessive consumption of food products.

E. General Mills' charitable activities in schools

General Mills does not advertise in schools. We apply this restriction not only to pre-K through 6th grade, but through high school. We will continue our policy to not advertise food or beverage products of any kind, regardless of nutrition profile, in schools. Similarly, we will not conduct giveaways, product promotions, contests or any other advertising activity primarily directed to students in schools.

The General Mills Box Tops for Education program operates in schools under the "charitable fundraising" exemption. All components of the program (e.g., website, printed materials) are specifically and primarily directed to parents and other adults. For example, although Box Tops collection boxes may be located in schools, the collection boxes do not contain product messages, General Mills equity characters, or product brand images.

General Mills will continue to operate this charitable fundraising activity in compliance with its Pledge and the principles of the CFBAI. Over \$550 million has been earned by schools since the program began in 1996. During the 2012-2013 school year, over \$80 million was earned by schools (with over 86,000 schools participating at an average of \$900 per school). The program includes a wide variety of products, allowing participating consumers to pick products that meet their needs. Box tops coupons are offered on hundreds of different products, with a significant percentage of the redemptions coming from non-food items, such as tissues, paper towels and food storage bags.

F. Product List

The attached General Mills product list contains information on those products that the Company intends to advertise in media primarily directed to children under 12.