Fourth Amended and Restated Submission of Kraft Foods Group, Inc. to the Children’s Food and Beverage Advertising Initiative December 31, 2013

Kraft has for many years been a strong supporter of the Council of Better Business Bureaus (“CBBB”) and its advertising self-regulation programs. Consistent with that historical commitment, Kraft agreed in November 2006 to support the CBBB’s Children’s Food & Beverage Advertising Initiative. The Initiative provides that each Participant will, in consultation with the CBBB, develop a Pledge incorporating certain core principles. This document sets forth Kraft’s Pledge for CBBB review. We are aware that the information described in Sections A and B below will be made publicly available on the Initiative website.

A. Identifying Information

1. Corporate name and address

Kraft Foods Group, Inc.
Three Lakes Drive
Northfield, IL 60093

2. Contact information of an individual(s) responsible for Pledge implementation

Vice President and Associate General Counsel, Regulatory, Marketing and Trademarks
Kraft Foods Group, Inc.
Three Lakes Drive
Northfield, IL 60093

Phone: 847.646.2000
E-mail: cbbbpledgeinquiries@kraft.com

3. Name of the specific entities covered by the Pledge

All U.S.-based businesses of Kraft Foods Group, Inc.

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

The Kraft products on the attached spreadsheets may have child-directed advertising campaigns. From time to time, we may amend this list by adding certain products that may be advertised consistent with the terms of our Pledge.

B. Core Principles

1. A statement regarding the Participant’s intention to comply with the Advertising Messaging principle for all media identified in the Core Principles:

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1 Note that this Pledge does not always apply to all SKUs sold under a given brand, but rather to specific items or sub-lines. For example, although Kool-Aid Liquid Concentrate meets our nutrition requirements, Regular Kool-Aid does not. As a result, we advertise the former, but not the latter to children ages 6-11.
Kraft does not advertise in media primarily directed to children under 6.
For the following media directed primarily to children between 6 and 11, Kraft only advertises products that meet CFBAI’s nutrition criteria:

- television,
- radio,
- print,
- Internet: third-party websites and company-owned websites
- 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 ages 6-11,
- DVDs of G-rated movies or other content that are primarily directed to children under 6-11,
- Cellphones and PDAs, and
- Word of mouth advertising.

2. The criteria Participant uses to determine whether advertising is “primarily directed to children under 12.”

a. For measured media (television, radio, print and Internet (excluding company-owned websites)): When audience demographics are included in a definition, the data should be based on media impressions or other relevant metrics at the time the advertising is purchased (which may be based on dayparts and annualized audience data) as determined by reliable third party data such as Nielsen ratings for TV, and Nielsen or Comscore data for Internet sites.

1. Television: Kraft does not advertise during any daypart where 35% or more of the total audience is under 6. In addition, Kraft restricts its advertising to only those products that meet CFBAI’s nutrition criteria during:
   - any daypart where 35% or more of the total audience is under 12
   - any daypart that falls within time periods traditionally regarded as “kids’ viewing time” (as designated by media providers), irrespective of the size of the child viewing audience.

   Audience composition will be determined based on Nielsen-reported average audience figures for the four-quarter television season most recently completed prior to the media buy.

2. Print and Radio: Kraft does not advertise in publications or on radio directed primarily to children under 6.
   Kraft will advertise only those products that meet CFBAI’s nutrition criteria in publications and on radio directed primarily to children under
12, based on MRI-reported readership data for publications, Arbitron-reported audience data for radio and audience information provided in media kits for those magazines and networks not included in this data. The current list of publications and radio networks that Kraft has determined are primarily directed to children under 12 include:

- Boy’s Life
- Girl’s Life
- National Geographic for Kids
- Playstation: The Official Magazine
- Sports Illustrated for Kids
- Twist
- DC Comics
- DC Archie
- DC Bongo
- WWE Kids Magazine
- M
- Popstar!
- Marvel Comics Jr.
- Marvel Comics
- American Girl
- Discovery Girls
- Jack & Jill
- Children’s Digest
- Children’s Playmate
- Child Life
- U*s* Kids
- Highlights
- Ranger Rick
- Tiger Beat
- Bop
- Radio Disney

3. **Internet:** Kraft does not advertise on web sites where 35% or more of the total visitors are under 6. On web sites where 35% or more of the total visitors are children under 12, Kraft will advertise only those products that meet CFBAI’s nutrition criteria. Total visitors for web sites will be determined based on average, annual total visitor data as reported by Nielsen Net Ratings or by ComScore.

b. **The proposed method by which the Participant intends to measure advertising on Participant-owned websites and micro-sites.**

None of Kraft’s own websites is directed to children under 6. In addition, Kraft features only those products that meet CFBAI’s nutrition criteria on its own websites where 35% or more of the total visitors are children under 12, as determined either by Nielsen Net Ratings or by site registration data.
3. The scientific and/or governmental standard(s), or the company developed standard(s) on which the Participant is relying to designate a product as a healthy dietary choice or better-for-you product. To the extent that the Participant is relying on a company-developed standard, state the scientific and/or governmental standard(s) on which it is based.

As of December 31, 2013, Kraft will advertise to children solely those products that meet CFBAI’s uniform nutrition criteria. CFBAI’s nutrition criteria can be found online at the CBBB’s website:


4. A description of the manner by which the Participant intends to implement the Licensed Character, Celebrity and Movie Tie-In principle.

Kraft only uses licensed characters on a long-term basis in advertising products that meet CFBAI’s nutrition criteria. Kraft also uses licensed characters in short-term promotions across its portfolio. However, when we advertise those short-term promotions to children 6-11 in any of the media described in the Advertising Messaging principle, we feature only the items that meet CFBAI’s nutrition criteria. In addition, we permit celebrity and movie tie-ins across our portfolio, but we feature only the items that meet CFBAI’s nutrition criteria when we advertise to children 6-11 in any of the media described in the Advertising Messaging principle.

5. A description of the manner by which the Participant intends to implement the Product Placement principle.

We have instructed our Marketing and Promotions professionals that they may not pay for or actively seek to place Kraft’s food or beverage products in the program/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products.

6. A description of the manner by which the Participant intends to implement the Interactive Games principle, which now includes interactive games in whatever format (online, disk or cartridge), when provided free or at nominal charge.

In Interactive Games incorporated into websites primarily directed to the under-12 audience, we only depict products that meet CFBAI’s nutrition criteria. For Interactive Games provided in other formats, we have instructed our Marketing and Promotions professionals that they may only depict products that meet CFBAI’s nutrition criteria.

7. A description of the manner by which the Participant intends to implement the Advertising in Schools principle.

We abandoned all in-school advertising and marketing several years ago (pre-kindergarten through 12th grade).
C. Supporting Data

For each product that the Participant intends to comply with the standard established in section B.3 above:

a. the product’s name;

b. the established scientific, governmental and/or company developed standard relied on; and

c. the basis for concluding that the product meets the standard.

The attached spreadsheets contain information on those products that Kraft intends to advertise in media primarily directed to children ages 6-11.

Attachment: Exhibits for Advertised SKUs

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