

Children’s Food and Beverage Advertising Initiative
Conagra Brands Pledge

At Conagra Brands, Inc., we understand the importance of marketing to children in a responsible way and are proud to be a participant in the Children’s Food and Beverage Advertising Initiative (CFBAI), a self-regulation program with the goal of improving the landscape of food and beverage advertising directed to children. Conagra Brands supports CFBAI’s objectives and is committed to its Core Principles. Conagra Brands is pleased to submit this restated pledge, which is consistent with its previous CFBAI pledges and reflects CFBAI’s Core Principles, 5th ed. (2020). This pledge takes effect January 1, 2021, except for implementation of the Uniform Nutrition Criteria, 2nd ed., which took effect January 1, 2020.

I. Identifying Information

1. *Corporate Contact Information:*

Conagra Brands
222 W. Merchandise Mart Plaza
Suite 1300
Chicago, IL 60654
www.conagrabrands.com

2. *Individual(s) responsible for overall implementation of the Pledge:*

Marissa Reich
Senior Counsel
Conagra Brands
222 W. Merchandise Mart Plaza
Suite 1300
Chicago, IL 60654
marissa.reich@conagra.com
(312) 549-5584

Tracey Phillips Beck
Vice President & Chief Counsel
Conagra Brands
222 W. Merchandise Mart Plaza
Suite 1300
Chicago, IL 60654
tracey.beck@conagra.com
(312) 549-5177

3. *Entities covered by the Pledge:*

All US-based businesses of Conagra Brands, Inc.

Brand(s) and/or product line(s) covered by the Pledge:

Our Pledge covers the marketing activities in the United States (excluding territories and possessions) for all of Conagra Brands' brands and businesses. Brands that have (or may opt to conduct) marketing activities directed to children under 12 are provided to CFBAI and are posted on its website OR are posted on its website at <https://bbbprograms.org/programs/all-programs/cfbai/home>.

Conagra Brands commits that it will advertise only products that comply with CFBAI's nutrition criteria in advertising primarily directed to children under 12, in accordance with this pledge. The company will provide information regarding such products to CFBAI prior to advertising them so that CFBAI can assess whether the products meet CFBAI's nutrition criteria and publicly indicate that the products qualify, and effectively monitor Conagra Brands' compliance with its Pledge.

II. Core Principles

1. Advertising Primarily Directed to Children under Age 12

Conagra Brands commits that all advertising primarily directed to children under age 12 in covered media will be for foods that meet [CFBAI's Category-Specific Uniform Nutrition Criteria, 2nd ed.](#)

2. Covered media

The advertising commitment applies to the following media ("covered media"):

- Television
- Radio
- Print
- Internet/Digital media, including but not necessarily limited to:
 - Company-owned websites
 - Third-party websites, including display, banner, pop-up, audio or video advertising¹
 - Mobile apps or mobile media, including advertising on phones, laptops, tablets, other personal digital devices, in whatever form, including email, text, IM or SMS messaging
- Platforms (e.g., YouTube) that may have content or channels that are primarily directed to children²
- Video and computer games that are primarily directed to children under age 12

¹ User-generated content that is not under the control of Conagra Brands is not covered by the Core Commitments.

² As provided in CFBAI's Core Principles, advertising on a platform that uses valid age verification to restrict access presumptively is not primarily directed to children under age 12.

- 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
- Word of mouth.³

3. Product Placements

Conagra Brands commits to not paying for or actively seeking to place its foods or beverages into third-party program or editorial content of any medium primarily directed to children under age 12 to promote the sale of those products.

4. Product Integrations

Conagra Brands commits that the paid for or actively sought integration of their foods or beverages in any medium primarily directed to children under age 12, including in interactive games or other digital content, will promote only foods or beverages that meet CFBAI's uniform nutrition criteria.

5. Influencers

Conagra Brands commits to use influencers to promote foods and beverages in communications primarily directed to children under 12 only if the foods or beverages meet CFBAI's Uniform Nutrition Criteria.

6. Licensed Characters, Celebrities and Movie Tie-Ins

Conagra Brands commits that its use of third-party licensed characters, celebrities (including athletes) and movie tie-ins in advertising primarily directed to children under age 12 will be consistent with its advertising commitments set forth in above.⁴

7. Advertising in Elementary Schools

Conagra Brands commits to not advertising branded foods or beverages to children in elementary schools, pre-K through 6th grade. This includes but is not limited to advertising on or through the following items:

- Posters
- Scoreboards
- School buses
- Pencils, book covers, and other school supplies offered for sale in school
- Textbooks
- Tray liners, cups, napkins, plates
- Coolers
- Food samples and taste tests

³ Word of mouth advertising refers to advertising primarily directed to children where a participant provides incentives (financial or otherwise), product samples or other support to individuals or groups who are not employees to encourage such individuals or groups to discuss the company's branded foods or beverages.

This commitment does not apply to displays of foods and beverages that identify foods that are for sale; fundraising support; public service messaging; curriculum materials; items given to school administrators for their personal use; charitable donations, or sponsorships.

⁴ This commitment does not apply to other marketing channels, such as point-of-sale materials or packaging (provided that the packaging does not appear in advertising primarily directed to children). This commitment also does not apply to the use of company-owned characters.

III. Definitions of Child-Directed Advertising

Conagra Brands will use the following criteria to define advertising primarily directed to children and to demonstrate compliance with CFBAI's Core Commitments.

Measured media. For measured media, Conagra Brands will define "advertising primarily directed to children" as advertising for which children ages 2-11 constitute at least 30% of the expected audience (the "audience threshold"). The audience demographics that determine compliance with this audience threshold will be measured in media impressions expected to be received by specific demographic groups at the time the advertising is purchased, based on reliable third-party information (e.g., Nielsen ratings for TV or comScore data for digital media).

Conagra Brands typically purchases television advertising once annually, well in advance of when the advertising will air, on a daypart or timeblock basis. Advertising placed in purchased dayparts or timeblocks will be identified as compliant for purposes of CFBAI based on an analysis of the annualized audience composition data for the block of time purchased.

Digital and online media. For "contextual advertising," which is served based on the content that is adjacent to the ad or in which the ad is placed, Conagra Brands will determine whether such content is child-directed based on an assessment of the composition of the audience for that content (if known) or, where reliable audience composition data is not available, an assessment of multiple factors related to that content.

Where audience composition is known, Conagra Brands will consider such advertising primarily directed to children if 30% or more of the audience for the site, app, or content in which the ad is placed are children under age 12. Where audience composition data is inadequate to make this determination, such advertising will be deemed primarily directed to children if the ad is placed in content that appears to be child-directed based on an evaluation of multiple factors related to that content, including whatever age demographics for the site or digital content may be available, an assessment of the overall nature of the content, including but not limited to the subject matter of the site or video, the visual content, the language used, the kind of music or audio content, the difficulty of game play, the influencer or influencers featured in the content, actions taken to restrict children's access to the site or content, and content identifier tools that indicate whether content is child-directed provided by platforms or content developers.

Conagra Brands also will use age-targeting tools and interest-based or behavioral factors to avoid serving ads for foods that do not meet CFBAI's Uniform Nutrition Criteria to children, such as:

1. Age-targeting (based on cookie data or other age indicia) to audiences other than children;
2. Targeting based on interest-based or behavioral data to audiences other than children;

3. Blacklisting of specific sites, channels or other content that are directed to children; and
4. The use of relevant topic, keyword, or content classification or identification systems or filters provided by the platform owner or content developer (e.g., an app developer).

IV. ADVERTISING TO CHILDREN UNDER SIX YEARS OLD

Conagra Brands commits to not engaging in advertising primarily directed to children under six.