

Children's Food and Beverage Advertising Initiative General Mills Pledge

April 2020

General Mills is pleased to submit its restated Pledge to 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 in the United States. General Mills is proud to be a charter member of CFBAI and is committed to maintaining the highest standards for responsible advertising. The scope and breadth of our Pledge, which is consistent with our previous CFBAI pledges and reflects CFBAI's Core Principles, 5th ed. (2020), demonstrates General Mills' continuing commitment to providing clear leadership on this important issue. This pledge takes effect January 1, 2021, except for implementation of the Uniform Nutrition Criteria, 2nd ed., which took effect January 1, 2020.

A. Identifying Information and Pledge Overview

1. Corporate contact information:

General Mills, Inc.
Number One General Mills Boulevard
Minneapolis, Minnesota 55426
(763) 764-7600
www.generalmills.com

2. Individual responsible for overall implementation of the Pledge:

Mark Gustaferra
Associate General Counsel
mark.gustaferra@genmills.com
(763) 764-4169

3. Entities covered by the Pledge:

General Mills, Inc. and its U.S. subsidiaries.

4. Brands and product lines covered by the Pledge; overview of Pledge:

This Pledge covers our U.S. food business. Please see www.generalmills.com for an overview of our brands and product lines.

General Mills commits that, to the extent it engages in advertising primarily directed to children under 12, it will advertise only those products that comply with CFBAI's nutrition criteria, in accordance with this Pledge. General Mills 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, publicly indicate that the products qualify, and effectively monitor General Mills' compliance with its Pledge.

B. Core Principles and Commitments

1. Advertising primarily directed to children under age 12

General Mills 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
- 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

¹ User-generated content that is not under the control of General Mills is not covered by the commitment.

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.

³ Word of mouth advertising refers to advertising primarily directed to children where an advertiser 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 advertiser's products.

3. Product placements

General Mills commits to not paying for or actively seeking to place its foods 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

General Mills commits that the paid for or actively sought integration of its foods in any medium primarily directed to children under age 12, including in interactive games or other digital content, will promote only foods that meet CFBAI's Uniform Nutrition Criteria.

5. Influencers

General Mills commits to use influencers to promote foods in communications primarily directed to children under 12 only if the foods meet CFBAI's Uniform Nutrition Criteria.

6. Licensed characters, celebrities and movie tie-ins

General Mills 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 above.⁴

7. Advertising in schools

General Mills continues its longstanding commitment to refrain from advertising foods to children and older students in schools or at school events – and this commitment applies to all schools, from pre-K through 12th grade. This commitment covers all forms of advertising (beyond the identification of the brand and product on menus and packaging). For example, we do not depict or display food brands, products, or logos on posters, signs, scoreboards, or school equipment, nor do we promote foods by distributing product samples or branded merchandise in schools. There are no exceptions to our commitment.

We operate the Box Tops for Education school fundraising program which, through sales of our products and those of many other companies (primarily nonfood companies), has provided close to \$1 billion to schools since the program's inception in 1996. Though schools are the beneficiaries of this program, we refrain from

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.

advertising the program to school children (whether inside or outside the school environment).

C. Definitions of Child-Directed Advertising

General Mills 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, General Mills 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).

General Mills 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, General Mills 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, General Mills will consider such advertising to be primarily directed to children if 30% or more of the audience for the site, app, or content in which the ad is placed consists of children under age 12. Where audience composition data is inadequate to make this determination, such contextual advertising will be deemed to be 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.

Other digital advertising (not “contextual advertising”) is targeted to the audience for that ad in a variety of ways. General Mills meets its CFBAI commitments when placing such “targeted advertising” by using reliable age-targeting tools and/or other interest-based or behavioral factors to avoid serving ads for foods that do not meet CFBAI’s Uniform Nutrition Criteria to children. These tools include:

- Age-targeting (based on cookie data or other age indicia) to audiences other than children;
- Targeting based on interest-based or behavioral data to audiences other than children;
- Blacklisting of specific sites, channels, or other content that are directed to children; and
- 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).

D. No Advertising to Children Under 6

General Mills commits to not engage in any advertising primarily directed to children under age 6.