

Children’s Food and Beverage Advertising Initiative
The Kraft Heinz Company Pledge

The Kraft Heinz Company is 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. Kraft Heinz supports CFBAI’s objectives and is committed to its Core Principles. Kraft Heinz is pleased to submit this restated pledge, which is consistent with its previous CFBAI pledges and reflects CFBAI’s Core Principles, 5th ed. (2020).

I. Identifying Information

1. *Corporate Contact Information:*

The Kraft Heinz Company
200 East Randolph Street, Suite 7600
Chicago, IL 60601
www.kraftheinzcompany.com

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

Legal Department
U.S. Marketing Counsel
200 East Randolph Street, Suite 7600
Chicago, IL 60601
(847) 646-2000

3. *Entities covered by the Pledge:*

All U.S.-based businesses of The Kraft Heinz Company.

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

The designated products on Kraft Heinz Product List submitted each year 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. Kraft Heinz will provide information regarding such products to CFBAI prior to advertising them so CFBAI can assess whether the products meet CFBAI’s nutrition criteria and publicly indicate that the products qualify, and effectively monitor Kraft Heinz’s compliance with its Pledge.

II. Core Principles

1. *Advertising Primarily Directed to Children under Age 12*

Kraft Heinz does not advertise in media primarily directed to children under age 6. Kraft Heinz commits that all advertising primarily directed to children between

the ages of 6 and 11 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
- Print
- Radio
- 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

3. *Product Placements*

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

4. *Product Integrations*

Kraft Heinz commits that the paid for or actively sought integration of their foods or beverages in any medium primarily directed to children between the ages of 6 and 11, including in interactive games or other digital content, will promote only foods or beverages that meet CFBAI's Uniform Nutrition Criteria.

5. *Influencers*

Kraft Heinz commits to use influencers to promote foods and beverages in communications primarily directed to children between the ages of 6 and 11 only if the foods or beverages meet CFBAI's Uniform Nutrition Criteria.

¹ User-generated content that is not under the control of Kraft Heinz 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.

6. *Licensed Characters, Celebrities and Movie Tie-Ins*

Kraft Heinz only uses Licensed Characters, celebrities, and movie-tie-ins in advertising primarily directed to children between the ages of 6 and 11 in connection with products that meet CFBAI's Uniform Nutrition Criteria.³

7. *Advertising in Schools*

Kraft Heinz does not advertise or promote its products to children in schools (prior to the university level). This includes contests, posters, book covers, product sampling and any other forms of commercial messaging to children in schools during school hours or during school-sponsored activities outside of school hours.

Kraft Heinz products will continue to be sold in schools. Kraft Heinz may also provide products for free school lunch programs. Kraft Heinz will also continue to allow corporate philanthropic funding of school programs, as long as this support is free of any branded messaging.

III. Definitions of Child-Directed Advertising

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

Advertising Primarily Directed to Children Under Age 6 - advertising for which children under age 6 constitute at least 30% of the expected audience.

Advertising Primarily Directed to Children Ages 6-11 - advertising for which children ages 6-11 constitute at least 30% of the expected audience.

Audience Threshold – 30% of the expected audience.⁴

Measured media. 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).

Kraft Heinz typically purchases television advertising once annually, well in advance of when the advertising will air, based on network or daypart. 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 (as measured by Nielsen) for the block of time purchased.

³ 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.

⁴ Kraft Heinz will implement the 30% audience threshold as of January 1, 2021.

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, Kraft Heinz 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, 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.

Kraft Heinz 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).

Print: For print advertising, Kraft Heinz will determine whether such advertising is child-directed based on MRI-reported readership data for publications and other audience information provided in media kits for those publications not included in this data.

Radio: For radio advertising, Kraft Heinz will determine whether such advertising is child-directed based on Arbitron-reported audience data for radio and other audience information in media kits for those radio networks not included in this data.

IV. ADVERTISING TO CHILDREN UNDER SIX YEARS OLD

Kraft Heinz commits to not engaging in advertising primarily directed to children under six.