

Children’s Food and Beverage Advertising Initiative
Mondelēz Global LLC Pledge
July 2020

Mondelēz Global LLC (“Mondelēz Global”) 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. Mondelēz Global does not market directly to children under 12 years of age; therefore, our all-family marketing is directed to the adults/parents/guardians, who we empower with information and product choices to make mindful snacking decisions. Mondelēz Global supports CFBAI’s objectives and is committed to its Core Principles. Mondelēz Global 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.

I. Identifying Information

1. *Corporate Contact Information:*

Mondelēz Global LLC
100 Deforest Avenue
East Hanover, New Jersey 07936

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

Vice President and Chief Counsel, North America
100 Deforest Avenue
East Hanover, NJ
Phone number: 973-503-2023
e-mail: CFBAIpledgeinquiries@mdlz.com

3. *Entities covered by the Pledge:*

U.S based business of Mondelēz Global LLC

II. Core Principles

1. Advertising Primarily Directed to Children under Age 12

Mondelēz Global recognizes CFBAI’s Uniform Nutrition Criteria; however, Mondelēz Global does not advertise in media primarily directed to children under 12, irrespective of the product's nutritional profile.

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

3. Product Placements

Mondelēz Global 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

Mondelēz Global commits to not paying for or actively seeking integration of their foods or beverages in any medium primarily directed to children under age 12, including in interactive games or other digital content.

5. Influencers

Mondelēz Global commits to not using influencers to promote foods and beverages in communications primarily directed to children under 12.

6. Licensed Characters, Celebrities and Movie Tie-Ins

¹ User-generated content that is not under the control of Mondelēz Global 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.

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.

Mondelēz Global will not engage in using third-party licensed characters, celebrities (including athletes) and movie tie-ins in advertising primarily directed to children under age 12.

7. In-School Advertising

Mondelēz Global does not advertise its brands or market in school prior to the university level, during school hours or during school-sponsored activities outside of school hours.

This commitment does not apply to displays of foods and beverages that identify foods that are for sale.

We will continue to allow corporate philanthropic funding of school programs, as long as this support is free of any marketing or consumer-branded messaging and that our participation is philanthropic in nature and free of any selling intent.

III. Definitions of Child-Directed Advertising

Mondelēz Global 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, Mondelēz Global 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).

Mondelēz Global 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, Mondelēz Global 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, Global 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.

Other digital advertising (not "contextual advertising") is targeted to the audience for that ad in a variety of ways. Mondelez Global will meet its CFBAI commitments when placing such "targeted advertising" by using reliable age-targeting tools and/or other interest-based or behavioral factors. These tools include:

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. Exclusion 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).