

Children’s Food and Beverage Advertising Initiative **Unilever Pledge**

Unilever is pleased to continue its participation 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. Unilever supports CFBAI’s objectives and is committed to its Core Principles. Unilever is pleased to submit this restated pledge, which is consistent with its previous CFBAI pledges and reflects CFBAI’s Core Principles, 5th ed. (2020). As explained in more detail below, under this restated Pledge, Unilever does not advertise to children who are younger than twelve (12) years of age.¹ Where necessary, this pledge also explains how Unilever’s own global Principles on Responsible Food & Beverage Marketing to Children may differ while assuring compliance with CFBAI’s Principles. 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:

Unilever United States
700 Sylvan Ave.
Englewood Cliffs, NJ 07632 COMPANY
www.UnileverUSA.com

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

Kathryn Farrara, Esq.
Assistant General Counsel, Marketing
700 Sylvan Ave.
Englewood Cliffs, NJ 07632
Kathryn.Farrara@unilever.com
(201) 621-2338

Entities covered by the Pledge:

This pledge covers Unilever United States foods and refreshments brands sold in the U.S. (hereafter, Unilever’s “brands”).

Unilever commits that it will adhere to its pledge below as it applies to Unilever’s brands. This pledge is consistent with Unilever’s own [Principles on Responsible Food & Beverage Marketing to Children](#), under which Unilever will not direct any Marketing Communications to children aged under 12.² For television and other measurable media, this includes no Marketing Communications where children aged under 12 represent over 25% of the audience. For digital platforms, this includes no Marketing Communications directed to children under the age of 13.

¹ 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.

² Unilever’s Principles on Responsible Food & Beverage Marketing to Children also go into effect January 1, 2021.

II. Core Principles

1. Advertising Primarily Directed to Children under Age 12

Unilever commits that it will not advertise to children under 12.

2. Covered media

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

- Television
- Radio
- Print
- Internet/Digital media³, including but not necessarily limited to:
 - Company-owned websites
 - Third-party websites, including display, banner, pop-up, audio or video advertising⁴
 - 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 children⁵
- 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.⁶

3. Product Placements

Unilever 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

³ To comply with Unilever’s Principles on Responsible Food & Beverage Marketing to Children, Unilever will not direct any marketing communications to children under the age of 13 for digital platforms. Unilever considers the target demographic based on the media plan in line with digital platform policies.

⁴ User-generated content that is not under the control of Unilever is not covered by the Core Commitments.

⁵ 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 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.

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

5. Influencers

In accordance with Unilever's own Principles, Unilever commits to not use influencers⁷ who primarily appeal to children under age 12, regardless of whether products meet nutrient criteria. Unilever also commits to not use influencers who are themselves under the age of 12.

6. Licensed Characters, Celebrities and Movie Tie-Ins

Unilever 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.

7. Advertising in Elementary Schools

Unilever commits to not advertising branded foods or beverages to children in elementary schools, pre-K through 6th grade. Further, in accordance with Unilever's own Principles, Unilever commits to not promote its brands or products in secondary schools either (i.e. 6th through 12th 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

This commitment does not apply to displays of foods and beverages that identify foods that are for sale; fundraising support; public service messaging⁸; curriculum materials; items given to school administrators for their personal use; charitable donations, or sponsorships.

III. Definitions of Child-Directed Advertising

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

⁷ Unilever defines influencers as third-party endorsers such as celebrities, disruptors, social media stars, subject matter experts and editors/journalists etc. Unilever does not include licensed characters or brand-equity characters in its definition of influencers.

⁸ Unilever may participate in campaigns for education purposes. This commitment does not prohibit identification of corporate sponsorship to ensure transparency.

Measured media. For measured media, Unilever will use its own principles to define “advertising primarily directed to children” as advertising for which children aged under 12 constitute at least 25% of the expected audience (the “audience threshold”). This definition assures compliance with CFBAI’s definition for which children under 12 constitute at least 30% of the expected audience. 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).

Like others in the industry, Unilever purchases the majority of television advertising in dayparts, in advance of when the advertising will air. 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. Unilever considers the target demographic based on the media plan in line with digital platform policies. For “contextual advertising,” which is served based on the content that is adjacent to the ad or in which the ad is placed, Unilever 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, Unilever, in accordance with its own Company principles, will consider such advertising primarily directed to children if 25% or more of the audience for the site, app, or content in which the ad is placed are children under age 13. This also assures compliance with CFBAI’s commitment to restricting such advertising to children if 30% or more of the audience 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 the following factors related to that content: 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. Unilever will meet its CFBAI commitments when placing such “targeted advertising” by using reliable age-targeting tactics 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 tactics 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. 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

Unilever commits to not engaging in advertising primarily directed to children under six. Unilever has not done so since April 2006.