Submission of Mondelēz Global LLC
to the
Children’s Food and Beverage Advertising Initiative
April 1, 2018

This document sets forth for the Council of Better Business Bureaus’ (“CBBB”) review the Pledge of Mondelēz Global LLC (“Mondelēz Global”) to support the Children’s Food and Beverage Advertising Initiative (the “Initiative”). The Initiative provides that each Participant will, in consultation with the CBBB, develop a Pledge incorporating certain core principles. Mondelēz Global has adopted this Pledge to affirm its support. We are aware that the information described in this pledge will be made publicly available on the Initiative website.

As of January 1, 2016, Mondelēz Global has not advertised any products in any media primarily directed to children under age 12, irrespective of the product’s nutritional profile. Our all-family marketing is directed to the gatekeeper (adults, parents, guardians), as well as people age 12 and older, who we empower with information and product choices to make mindful snacking decisions.

A. Identifying Information

1. Corporate name and address

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

2. Contact information of an individual(s) responsible for Pledge implementation

Vice President and Chief Counsel, North America
Mondelēz Global LLC
100 Deforest Avenue
East Hanover, New Jersey 07936

Phone: 973-503-2023
E-mail: CFBAIpledgeinquiries@mdlz.com

3. Name of the specific entities covered by the Pledge

All U.S.-based businesses of Mondelēz Global LLC
B. Core Principles

1. A statement regarding the Participant’s intention to comply with the Advertising Messaging principle for all media identified in the Core Principles:

Mondelēz Global does not advertise in media primarily directed to children under 12, irrespective of the product's nutritional profile. This applies to all media, including: TV, print, radio, internet, brand and third-party websites (including on-line games), digital and mobile media, PG-rated video/DVD, smart phone/tablet apps and word-of-mouth advertising.

2. The criteria Participant uses to determine whether advertising is “primarily directed to children under 12.”

   a. For measured media (television, radio, print and Internet (excluding company-owned websites)): When audience demographics are included in a definition, the data should be based on media impressions or other relevant metrics at the time the advertising is purchased (which may be based on dayparts and annualized audience data) as determined by reliable third party data such as Nielsen ratings for TV, and Nielsen or Comscore data for Internet sites.

      1. **Television:** Mondelēz Global will not advertise any products on TV programs primarily directed to children under age 12. This covers advertising where 35% or more of the total viewing audience is under the age of 12.

         Audience composition will be determined based on Nielsen-reported average audience figures for the four-quarter television season most recently completed prior to the media buy.

      2. **Print and Radio:** Mondelēz Global does not advertise in publications or on radio directed primarily to children under 12.

      3. **Internet:** Mondelēz Global does not advertise on web sites where 35% or more of the total visitors are under 12. Total visitors for web sites will be determined based on average, annual total visitor data as reported by Nielsen Net Ratings or by ComScore or by site registration data.

   b. The proposed method by which the Participant intends to measure advertising on Participant-owned websites and micro-sites.

None of Mondelēz Global’s own websites are directed to children under 12.
3. The scientific and/or governmental standard(s), or the company developed standard(s) on which the Participant is relying to designate a product as a wholesome product. To the extent that the Participant is relying on a company-developed standard, state the scientific and/or governmental standard(s) on which it is based.

Mondelēz Global recognizes CFBAI’s Uniform Nutrition Criteria; however Mondelēz Global does not advertise to children under 12 years-old.

4. A description of the manner by which the Participant intends to implement the Licensed Character, Celebrity and Movie Tie-In principle.

N/A because Mondelēz Global does not advertise to children under 12 years-old.

5. A description of the manner by which the Participant intends to implement the Product Placement principle.

We have instructed our Marketing and Promotions professionals that they may not pay for or actively seek to place Mondelēz Global’s food products in the program/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products.

6. A description of the manner by which the Participant intends to implement the Interactive Games principle.

Mondelēz Global will not create branded interactive or digital games intended for children under age 12 years-old.

7. A description of the manner by which the Participant intends to implement the Advertising in Schools principle.

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.

C. Supporting Data

To determine if advertising is directed primarily to children under 12, Mondelēz Global will consider the following criteria:

- For TV, Mondelēz Global will not buy television time where 35% or more of the total viewing audience is expected to be children under 12 on an annualized basis, which typically covers those outlets marketed as “kid media” (e.g. Disney, Cartoon Network, Nickelodeon)”. Where program viewership data is unavailable, we use our best judgment to avoid programs that are likely to be intended for children under 12.
For Print and Radio: Mondelēz Global does not advertise in publications or on radio directed primarily to children under 12 based on MRI-reported readership data for publications, Arbitron-reported audience data for radio and audience information provided in media kits for those magazines and networks not included in this data. The current list of publications and radio networks that Mondelēz Global has determined are primarily directed to children under 12 include:

- Boy's Life
- Girl's Life
- J-14
- National Geographic for Kids
- Nintendo Power
- Official XBox Magazine
- Playstation: The Official Magazine
- Sports Illustrated for Kids
- Twist
- DC Comics
- WWE Kids Magazine
- M
- Popstar!
- Marvel Comics
- American Girl
- Discovery Girls
- Jack & Jill
- Radio Disney

For internet, online and digital media, including mobile, we do not advertise or place branded advergames or downloads on websites or digital sites where 35% or more of the total visitors are children under 12 as determined either by Nielsen Net Ratings, ComScore or by site registration data. Where data may be unavailable, we use our best judgment to avoid sites that are likely to be intended for children under 12 in accordance with CFBAI’s Core Principles.