

MARKETING TO CHILDREN POLICY

PURPOSE and SCOPE

The Kraft Heinz Company (“Kraft Heinz”) is committed to marketing and advertising its products in a responsible and sensitive manner, particularly products marketed and advertised to children. This policy sets **minimum baseline requirements** on how and what Kraft Heinz will market and advertise to children. In this policy, “children” are those aged 12 and under and “teens” are those aged 13-17. Infant portfolio is not within the scope of this policy.

Many countries in which we operate have local laws, standards or regulations, and Kraft Heinz might have made public commitments, in respect of marketing and advertising to children (“**Local Rules**”). If any of these are **stricter than this policy, they must be followed**. Note that Local Rules might have a different age definition of ‘children’ and ‘teens’, which might be higher than those set out above and which must also be followed.

In the US, this policy is consistent with Kraft Heinz’ Pledge and the Core Principles under the Children’s Food & Beverage Advertising Initiative (“CFBAI”), the requirements of the Children’s Online Privacy Protection Act (“COPPA”), and the Children’s Advertising Review Unit (“CARU”) Guidelines (collectively, the “U.S. Standards”).

External and internal marketers, including Kraft Heinz’ agencies involved in the creation or placement of advertising & marketing content, are required to be trained on this Policy as part of their onboarding and take regular refresher training. Those employees responsible for creating, approving, or placing marketing messages for Kraft Heinz have primary responsibility for compliance with this policy. The Legal Department is available to provide guidance on interpretation of this Policy and any applicable Local Rules.

Any variations from this Global Policy that are **less** strict than this Global Policy and any amendments to this Global Policy must be approved, in writing, by the Global Chief Growth Officer.

GENERAL PRINCIPLES

- This policy should be read in conjunction with the ICC FRAMEWORK FOR RESPONSIBLE FOOD AND BEVERAGE MARKETING COMMUNICATIONS (“**ICC Rules**”).
- Where we advertise, promote or sell our products to children and teens, we must do so in a responsible manner.
- Our marketing communications must be legal, decent, honest and truthful, and prepared with a due sense of social and professional responsibility.
- Special care should be taken in marketing or advertising directed at or featuring children or teens. The ICC Rules provide, and we commit that:
 - Such communications should not undermine positive social behavior, lifestyles and attitudes and wherever possible promote the importance of balanced diets and healthy lifestyles;

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- Products which are illegal for children or teens to purchase or are unsuitable for them should not be advertised in media targeted to them;
- Marketing communications directed to children or teens should not be inserted in media where the editorial matter is unsuitable for them;
- Marketing communications should not exploit inexperience or credulity of children, particularly to exaggerate the true size, value, nature, nutrition or health benefits, taste or performance of the product;
- Marketing communications should not contain any statement or visual treatment that could have the effect of harming children or young people mentally, morally or physically;
- Marketing communications should not suggest that possession or use of the promoted product will give a child or teen physical, psychological or social advantages over other children or teens, or that not possessing the product will have the opposite effect;
- Marketing communications should not undermine the authority, responsibility, judgement or tastes of parents or caregivers, having regard to relevant social and cultural values;
- Marketing communications should not include any direct appeal to children to persuade their parents or other adults to buy products for them;
- Food and beverage marketing communications should not encourage or condone excess consumption and portion sizes should be appropriate to the setting portrayed;
- Food products not intended to be substitutes for meals should not be represented as such.

REQUIREMENTS

- 1. No Advertising or Marketing to Children under age 6:** Kraft Heinz does not advertise any products in any media primarily directed to children under age 6 (“**Preschool Children**”). We consider media primarily directed to children under age 6 if 30% or more of the audience is children under age 6. This policy applies to *all* media, tactics, and promotions. A properly conducted “Corporate Citizenship Activity” is not considered marketing to Preschool Children¹.
- 2. Only Qualifying Products May be Marketed to Children ages 6-12:** in the US, a “Qualifying Product” is a product that meets CFBAI’s uniform nutrition criteria. In other countries, a ‘Qualifying Product’ is a product that meets the Kraft Heinz Global Nutrition Targets. Contact your nutrition team to confirm whether your product is a Qualifying Product.

Brands that include both Qualifying and non-Qualifying Products: Where a brand includes both Qualifying and non-Qualifying Products, in order to advertise to children ages 6 to 12 at the total brand level, at least 80% of the brand (by revenue) must be Qualifying Products. In the alternative, if a brand has a *clearly differentiated* sub-line and 100% of that sub-line is Qualifying Products, then *that specific*

¹ Sponsorship of certain educational and other non-commercial programs may benefit preschool or school-age children. When the program is directed primarily toward Preschool Children or the program involves characters appealing primarily to Preschool Children, any such sponsorship will be limited to mentioning Kraft Heinz’s support, such as a corporate logo, and will not actively market brands.

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sub-line may advertise to children ages 6 to 12. A sub-line must be clearly differentiated by a combination of elements such as package structure, graphics and product name.

Any child-directed advertising and any child-directed website should be only about Qualifying Products. If a child-directed advertisement is about a promotion that runs across Qualifying and non-Qualifying Products, only the Qualifying Products may be featured in the child-directed advertisement (and no non-Qualifying Products may be featured).

3. Guidelines Apply to Media that is Primarily Directed to Children: We consider media to be primarily directed to children ages 6 to 12 if 30% or more of the audience is children ages 6 to 12. Additional guidance for certain types of media appears below.

(a) **Television:** We restrict our advertising to feature only Qualifying Products during: (1) any television programming block where 30% or more of the total audience is expected to be age 12 or under or (2) any television programming block that falls within time periods traditionally regarded as “kids’ viewing time” (as designated by media providers), irrespective of the size of the child viewing audience.

(b) **Digital and Online Media:**

(i) Websites or Platforms. Child-directed websites or platforms are those websites or platforms where (1) 30% or more of the total visitors are age 12 or under or (2) the site, the platform or the content or channels of the website or platform appears to be primarily directed to the under-13 audience. On child-directed websites, platforms or channels, we only depict Qualifying Products even on a “co-viewing” site including an adult-directed section. We do not permit children aged 12 or under to register on Kraft Heinz adult-directed websites or for adult-directed communications.

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(ii) **Advergames.**² We do not develop games or incorporate our products, brands or mascots in any games primarily designed for or directed at children under age 6. For games primarily designed for or directed to children ages 6 to 12, we only incorporate Qualifying Products in such games.

(c) **Movies and Cinema Advertising:** We can purchase cinema advertising for (or advertising on DVDs of) movies primarily directed to children ages 6 to 12 only for Qualifying Products.

(d) **Video and Computer Games:** We will not purchase advertising on video or computer games primarily directed to Preschool Children, such as those rated “Early Childhood” or “EC.” We may purchase advertising for Qualifying Products on age-graded games for ages 6 to 12.

(e) **Mobile Apps/Media:** We will allow smart phone applications directed primarily to children ages 6 to 12, only for Qualifying Products. Any such applications for children aged 12 and under must not collect personally identifiable information from any child without first obtaining the verifiable consent of the child’s parent or guardian as further set forth in Section 7 below.

(f) **Influencers.** Influencers (including celebrities) ages 6 to 12 may be used to promote Qualifying Products in communications primarily directed to children ages 6 to 12. However, because children may have difficulty distinguishing between advertising and online content, influencers must clearly and prominently disclose the communication is advertising.

(g) **On-Pack:** We do not incorporate on-pack messaging (e.g., a game or puzzle) that appeals primarily to Preschool Children.

(h) **Premiums:** Premiums (sales promotion in which merchandise is given free or at a reduced price) should be intended for children ages 6 and older.

(i) **Promotions:** Any contests, sweepstakes or games directed at children may feature only Qualifying Products and be eligible only to children ages 6 and older.

4. Product Placement: Kraft Heinz does not pay for or actively seek to place our products into third-party programs, movie or editorial content of any medium primarily directed at children aged 12 or under to promote the sale of such products. Product Placement is defined as the insertion of a product into entertainment or editorial programming in an incidental, prop-like manner (i.e., although the product is visible, it is not incorporated into the script, story line, dialogue or action of the scene in an integral way).

² “Advergames” are defined as online games where the product, brand or mascot is embedded in the game, integrated into the game content or part of the playing experience.

- 5. Product Integration:** Kraft Heinz will only pay for or actively seek to integrate Qualifying Products in any medium primarily directed to children ages 6 to 12, including interactive games or other digital content.
- 6. No In-School Marketing:** Kraft Heinz does not advertise or promote any products in schools (prior to the university level). This includes contests, posters, school supplies, textbooks, scoreboards, school buses, coolers, tableware or eating utensils (e.g., trays, napkins, cups, plates, forks, or spoons), product sampling and any other forms of commercial messaging in schools during school hours or during school-sponsored activities outside of school hours.

Kraft Heinz-labeled products may continue to be sold in schools, where this is consistent with local regulations. While these products may be available in school stores, cafeterias or vending machines, we will not actively promote them [or permit commercial messages for our brands]. Kraft Heinz may also provide products for free/subsidized school meal programs so long as the products meet the school's nutrition guidelines and meet the nutrition guidelines of any other school nutrition pledge, we have signed in the market at issue (such as the Alliance for a Healthier Generation in the United States). In addition, we will also continue to allow corporate monetary philanthropic funding of school programs, as long as this support is free of any branded messaging

- 7. Additional Responsible Marketing Guidelines Apply:** We avoid blurring the distinction between advertising and other content in materials directed at children. On Kraft Heinz child-directed websites, we include a conspicuous "Ad Break" or Advertising disclosure on every website page where branding appears in order to clearly inform children that the website contains advertising messages.
- (a) All Kraft Heinz child-directed websites must abide by applicable privacy laws. As a minimum baseline, we must obtain verifiable parental or guardian consent prior to collecting any personally identifiable information from children aged 12 or under and must only collect such information as is strictly necessary to provide the requested services. Consult with the legal department to ensure compliance with local privacy laws, which might be more restrictive than this baseline.
- (b) With respect to advergimes and other digital games:
- We do not depict consumption of Kraft Heinz products or any other food products.
 - Before the launch of a digital game or after the digital game concludes, we endeavor to encourage an active lifestyle (for example, an animated message that states "Be a player. Get up and play an hour a day!").
 - The advergame itself must contain an "Ad Break" disclosure that is prominent and written in a manner, so a child clearly understands that it is an advertisement.
 - The total gaming experience (i.e., the total time played in one sitting) should be limited to an average of 15 minutes or less.

- (c) With respect to characters and licensing³:

³ Note that some Local Rules have specific provisions relating to licensed characters that are more restrictive – please seek advice

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- Kraft Heinz-Owned Characters: Kraft Heinz may continue to use existing Kraft Heinz-owned characters that may appeal to Preschool Children (e.g., Cheesasaurus Rex). We will avoid developing new characters that are likely to appeal primarily to Preschool Children.
- Licensed-in Characters: Kraft Heinz will not use Licensed Characters⁴ that appeal primarily to Preschool Children. Licensed Characters that appeal to children ages 6 to 12 may be used on Qualifying Products.
- Short-term promotions: Licensed Characters that appeal to children ages 6 to 12 are also permitted on Non-Qualifying Products for *short-term promotional purposes* (24 weeks or less and with a break of at least 24 weeks between different short-term promotions), on-pack or otherwise, as long as any advertising directed to children ages 6 to 12 features only Qualifying Products. Short-term promotions of non-Qualifying Products that will be advertised only to adults are generally permitted.

(d) We do not conduct marketing research for Kraft Heinz products (e.g., focus groups) among Preschool Children. Marketing research conducted among children and teens ages 6 and older requires the knowledge and consent of the child's legal guardian. Taste tests may be conducted with children of all ages, with prior consent of the child's legal guardian.

from the legal department for all use of licensed characters.

⁴ "Licensed Characters" are defined as fictional characters from any movie, TV show, comic book, toy, etc. appealing to children, or any other non-character representation of the property from which the character originated.