



## EU Pledge

### Kellogg Commitments

Kellogg Company ("Kellogg") has a 100-year heritage of health, wellness and nutrition. We also have a longstanding, demonstrated commitment to responsible marketing to children as reflected in our own Worldwide Marketing & Communication Guidelines, our active participation in numerous self-regulatory programs and other voluntary marketing initiatives around the world. We remain first and foremost committed to meeting our consumers' changing needs.

Kellogg is pleased to be one of the founding participants in EU Pledge. We recognize that food companies can play an important role in shifting the mix of products advertised to children to reflect the healthiest choices. We are dedicated to this important effort and to the goals and objectives of the Initiative. We are pleased to demonstrate that commitment as follows:

#### **A. Identifying Information**

**Corporate name and address of the Participant:** Kellogg Europe Trading LTD, The Kellogg's Building, Lakeshore Drive, Airside Business Park, Swords.

**Name and contact information of individuals responsible for overall implementation of the Pledge:** Paul Fitzsimmons, Director Corporate Affairs and Communication Europe, Telephone: +353-1-8830604; Marta Baffigo, Director Public Affairs Europe; Telephone: +32-2-7126301.

**Name of the specific entity covered by the Pledge:** Kellogg Europe Trading LTD.

#### **B. Core Principles**

##### **1. Kellogg intends to comply with the EU Pledge as follows:**

- Kellogg will continue its practice of not advertising on shows with audiences that are 50% or more pre-school age children (i.e., under 6 years old)
- Kellogg will not advertise foods that do not meet our Nutrient Criteria (as defined below) on TV, print, radio and third-party internet media directed primarily to children under 12 years of age.



- For TV advertising, we will not advertise foods that do not meet our Nutrient Criteria on childrens' programming, defined as any show that has a projected audience at the time media is planned of 50% or more children under 12 years old during any airing of that show. In addition, on shows that have a projected audience at the time the media is planned of 35%-49% children under 12, we will not advertise foods that do not meet our Nutrient Criteria on shows which, after review of facts and circumstances surrounding the show, we determine are specifically targeted to, or are designed specifically to appeal primarily to, children under 12.
- Radio or non-Kellogg/third-party internet media will be considered "directed primarily to children under 12" if the projected audience at the time of media planning is 50% or more children under 12 years old.
- For print media, we will not advertise products that do not meet our Nutrient Criteria in publications that are specifically designed to appeal to, or which are targeted primarily to children under 12 (e.g., Sapos y princesas; Il Giornalino; Le Journal de Mickey, Barbie).
- We plan to have our TV, radio, third-party internet and print media commitments fully operational by no later than December 31, 2008, subject to contractual obligations as noted below.

## 2. Description of how the Participant intends to comply:

- a. Subject to the above definitions of advertising to children under 12, Kellogg will not advertise products that do not comply with our Nutrient Criteria in TV, print, radio or third-party internet media directed primarily to children under 12 as specified above.
- b. **Nutrient Criteria.** Our Nutrient Criteria are as follows:
  - No more than 200 **calories** per serving
  - No more than 2g of **Saturated fats** per serving
  - 0g **trans fat** per serving<sup>1</sup>
  - No more than 230 mg of **sodium** per serving<sup>2</sup>

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<sup>1</sup> In Europe as there are no legal requirements to label TFA, we have expressed it as no addition of hydrogenated vegetable oils.

<sup>2</sup> For our Eggo™ frozen waffle/products, the maximum allowable level of sodium for these products marketed to children was increased from 10% DV (230mg) to 20% DV (460mg). These products are typically served as main dish. The average level of sodium across all current Eggo™ skus (approximately 400mg) is still below the 480 mg FDA sodium criteria for "healthy" classification, and well below the CSPI recommended limits of 600mg for main dishes and 770mg for meals. In addition, approximately 50% of the sodium is attributed to the leavening agent which is necessary to the functionality and form of the food.



- No more than 12g **sugars** as labeled per serving (excluding sugars from fruit<sup>3</sup> and dairy)
  - c. **Basis for Criteria.** The Nutrient Criteria are derived from both governmental (U.S. FDA) and scientific (National Academy of Sciences Institute of Medicine (“IOM”) standards. We started with macronutrient standards set by IOM as they apply to an overall, daily diet. Specifically, we derived total daily recommendations/Dietary Reference Intakes from various IOM reports for calories (2,000), saturated fats (20g based on 10% calories from saturated fat), sodium (2300mg based on the Upper Tolerable Level established for sodium) and sugar (125g based on IOM recommendations to limit added sugars due to concerns about nutrient dilution). For trans fat, we used the FDA “0” labeling standard of less than 0.5g per serving. To convert these daily intake levels to individual food values for calories, saturated fat, sodium and sugar, we looked to the FDA disqualifying nutrient criteria percentage (20%) and conservatively halved that to develop the 10% upper threshold levels of each nutrient as set forth above.
3. **Schools.** Kellogg will implement the Pledge commitment by continuing its practice of not advertising directly to children in elementary schools.

#### **Additional Commitments**

4. **Use of Licensed Properties:** The following rules apply specifically to the use of third-party licensed properties (e.g., characters, games, toys, movies, etc.) per agreements entered into after June 2007:
- a. We will not use third-party licensed properties in advertisements on mass media, or on Kellogg-owned or Kellogg-controlled digital media directed primarily to children under 12 in connection with products that do not meet the KGNC.
  - b. We will not use licensed third-party properties as the basis for a food form/product unless that product meets the KGNC.
  - b. We will not use child-directed marketing that features licensed properties, which includes inserts, licensed property depictions and tie-ins, on the front panel of products that do not meet the KGNC.
  - c. These limitations are intended to apply if **either** the licensed property itself, or the promotion involved, is targeted to, or is designed primarily to appeal to, children under 12.

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<sup>3</sup> For these purposes, “fruit” does not include so-called “stripped juices” which are juices stripped of their nutritional content.



- d. These limitations also apply to in-store displays and other in-store promotions featuring licensed properties which are primarily directed at, or which are designed primarily to appeal to, children under 12.
5. **Product Placement:** We will not pay for or seek out promotional product placement (i.e., embedding our products within program or editorial content, as distinguished from general “Kellogg Company” sponsorship) for **any** product in any medium (such as video games, TV shows, books, movies) specifically designed to appeal to, or directed primarily to, children under 12, regardless of whether the product meets the KGNC. This limitation helps to ensure that there is no confusion for children as to where program content ends and advertising begins.
6. **Other Marketing/Media:** We are committed to not using the following activities/techniques directed to children under 12 for non-KGNC products:
  - a. Celebrity spokespersons who are related to or affiliated with mass media that itself is directed primarily to children under 12 (e.g., stars from sit-com-type program targeted to children under 12)
  - b. Viral marketing directed primarily to children under 12 (e.g., “forward to a friend” or e-card messages)
  - c. Product-branded (vs. generic Kellogg Company) toys and games sold for, or distributed to, children under 12 (e.g., licensed toys and games sold at retail)
  - d. Product (vs. generic Kellogg Company) sponsorship of “kids clubs” or other children’s commitments
  - e. Marketing messages directed to or using children’s cell phones (i.e., ring tones, messages to kids)

Kellogg is proud to be part of this important Initiative and is committed to both its success and its contributions.