



# Principles on Responsible Food & Beverage Marketing to Children

October 2022



Unilever



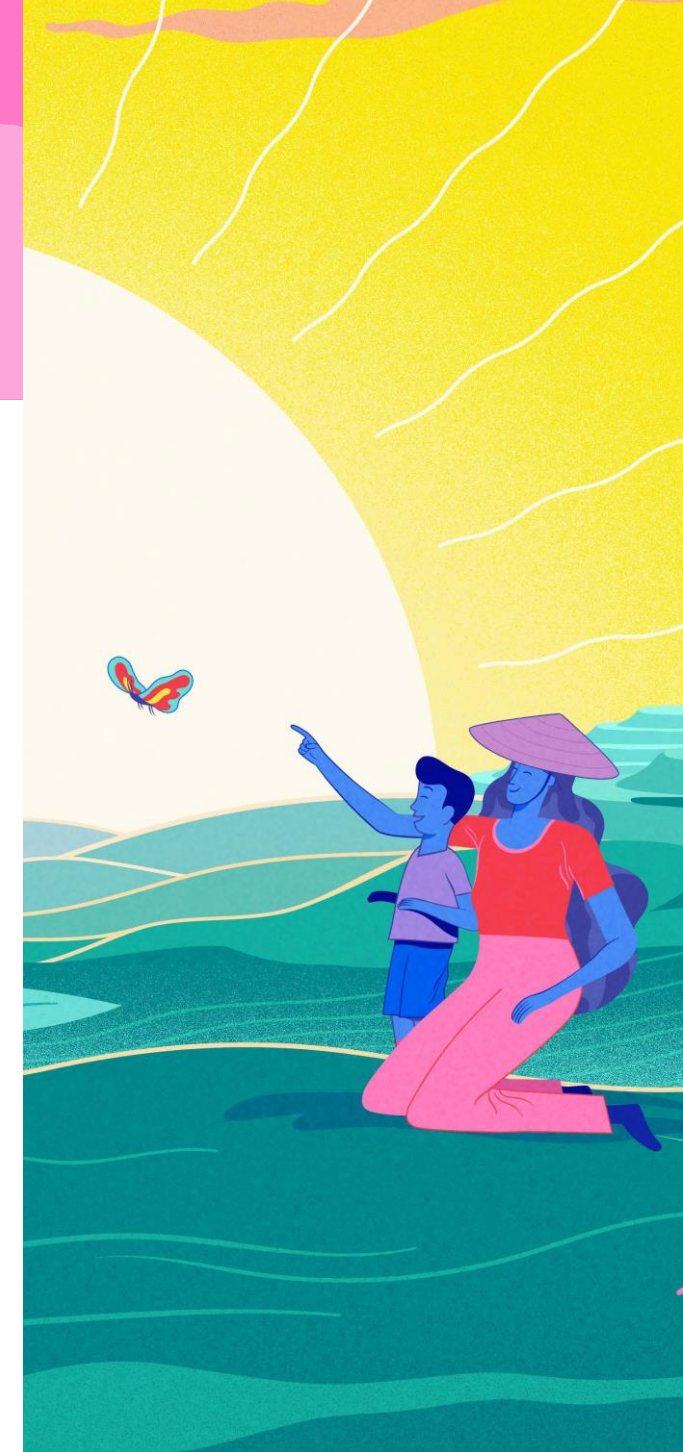
NUTRITION



**Advertising and marketing help us to inform people about the composition and benefits of our products and innovations. Marketing allows us to engage with consumers on issues that matter to them.**

Back in 2003, Unilever was one of the first companies to apply principles for the marketing of its foods and beverages to children, which we have updated over the years. In April 2022 we published our latest evolved set in the context of the continued concern about childhood obesity, the impact of social media and the vast number of products to choose from. The key evolution being that it takes account of an increased age threshold to define a child, i.e. 16 years.

In this October 2022 update we clarified Principle 1 further. We added '**intentionally**'. It is clear that targeting is by design intentional, as you do this based on data profiles or set requirements. However, by adding 'intentionally', we intend to make this even more clear. Also we point out this relates to **paid** media, as with organic posting age gating can not be guaranteed on some social media platforms. We also updated our data collection statement to go back our original commitment to not collect personal data from children aged under 13. Upon implementation this proved not possible to comply to not collecting data for <16s for reasons of shared data across brands beyond Nutrition and Ice Cream and varying data systems across the globe. So with this update we are revising this back to Unilever does not collect personal data from children aged under 13. We still intend to ensure better data protection of teens and will seek approaches to explore this to be able to live up to a commitment in this space in future starting some specific regions such as US.

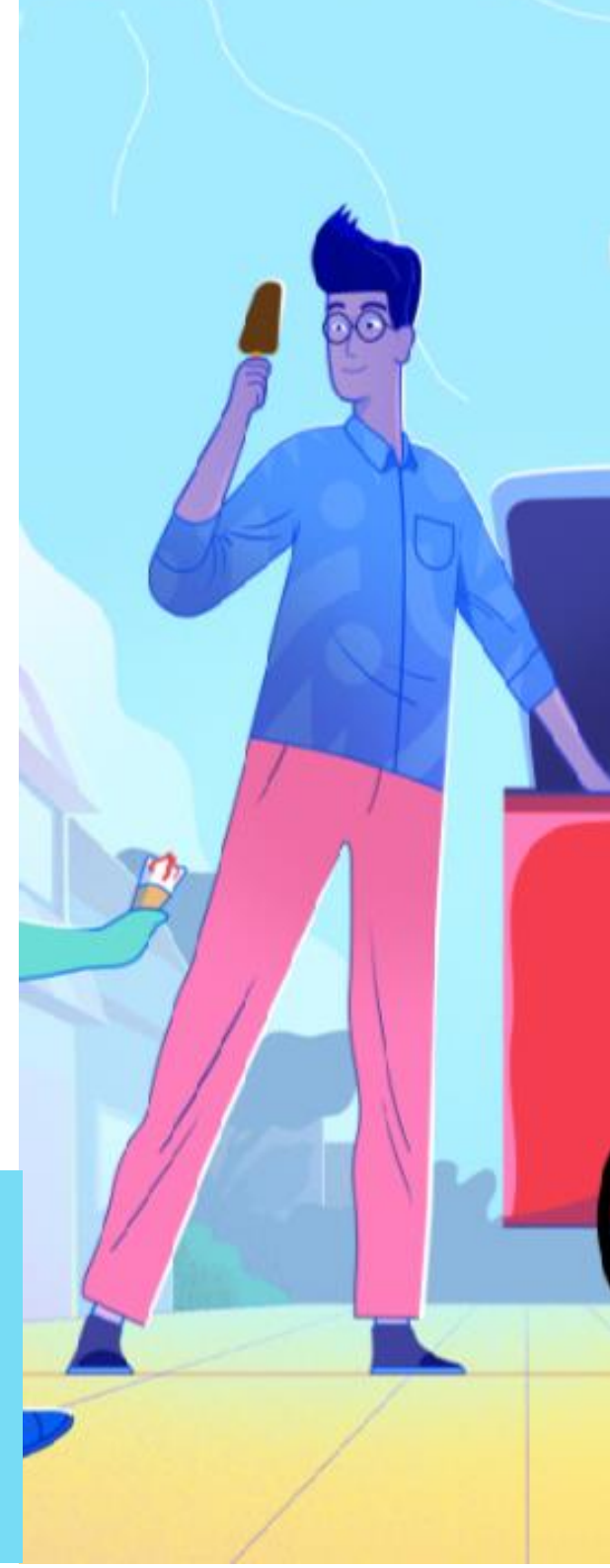


These principles are applicable to all of Unilever’s Nutrition and Ice Cream brands but do not cover brands in other Unilever Business Groups. They cover all our food and beverage Marketing Communications and activities globally , which include but are not limited to: *Television and radio advertising, digital activity (including both company-owned and third-party websites and platforms), all forms of social media and digital advertising, apps, online games and direct marketing; PR materials, and all other forms of communication (e.g. cartoon characters, product placements, adver gaming, free gifts/toys, etc.).* We will refer to these marketing activities and communications collectively as **“Marketing Communications”**. This term will also include new marketing techniques or channels that may be developed in the future. In-store displays, our ice cream range cards and freezers, labelling and packaging, as well as the product itself, are referred to as **“Point of Sale Communications.”**

Our Principles are based on the International Chamber of Commerce (ICC) framework for Responsible Food and Beverage Marketing Communications. In addition, we take into account the large network of national and local self-regulatory codes and organisation (such as national advertising associations, television network approval guidelines, etc.) which guide us in all of the countries in which we operate.

Unilever’s Marketing and Point of Sale Communications must comply with all relevant laws and regulations in any country. There are also self-regulatory codes that guide us. The strictest standards (either local law, regulation or Unilever-signed voluntary pledges) will always prevail.

These principles are in addition to Unilever’s General Principles on responsible food and beverage marketing – these can be found online.



**1.** We will **not intentionally** target any **paid Marketing Communications** to **children aged under 16**. For **television and other measurable media**, this includes no Marketing Communications where children aged under 16 represent over 25% of the audience. For **digital platforms**, this includes no Marketing Communications directed to children under the age of 16 and we will consider the target demographic based on the media plan in line with digital platform policies.

**2.** The **creative execution** of Marketing Communications should **not be designed** to be directed to children aged under 16, which includes the overall impression of the advertising.

**3.** All products Responsibly Made for Kids will adhere to **Unilever's Highest Nutritional Standards**.

In addition, for our Responsibly Made for Kids range in ice cream, **we cap the total sugar level to 12 grams** or less per portion and will continue to contain 110 kilocalories or less per portion.

**4.** We will **not advertise in or sponsor films** where the intended audience is primarily children aged under 16.



**5.** We will **not show children aged under 16** in our Marketing Communications, unless it is in relation to products meeting Unilever's Highest Nutritional Standards /Responsibly Made for Kids or if it is relevant to the marketing message(e.g. a family situation or activity). Parents or gatekeepers will always be portrayed in control of the access to a product.

**6.** We will **not promote** the sale of products in the **content of a programme** directed to children aged under 16.

**7.** We will **not use (licensed) cartoon characters or brand-equity characters** primarily appealing to children aged under 16 in our Marketing Communication. We will use characters in our Point of Sale Communications primarily appealing to children aged under 16 but only in association with products which are meeting HNS or Responsibly Made for Kids.

**8.** We will **not use influencers** (i.e. third-party endorses such as celebrities, disruptors, social media stars, subject matter experts and editors/journalists etc.) who are under the age of 16. We will also not use influencers who primarily appeal to children aged under 16. This is applicable for both our Marketing Communications and Point of Sales Communications.



**9.** We will **not offer gifts, toys, premiums or giveaways** primarily appealing to children under 16 in our Marketing Communications.

**10.** **Gifts, toys, premiums or giveaways** primarily appealing to children aged under 16 may only be offered in Point of Sale Communications for products Responsibly Made for Kids. These will have an educational purpose or health message and will **not exploit the inexperience or credulity of children.**

**11.** Point of Sale Communications should **support the role** of parents and other appropriate adult role models in **making the responsible choice.**

**12.** **Sales promotions** should be presented in such a way that children and parents are made **aware before making a purchase** of any conditions likely to affect their decision to purchase.



**13.** We will **not promote** our brands or products in **primary or secondary schools**. This does not include cabinets, displays, charitable fundraising activities, public service messaging, or communications directed to school administrators.

**14.** Where **specifically requested** by or **agreed with** the relevant health or education body and the school administration, Unilever may participate in **campaigns for educational purposes** with branding levels agreed with the education body to ensure transparency. This only applies to Responsibly Made for Kids products.

**15.** We will not direct any **Marketing or Point of Sale Communications** to children under 6 years of age.



# Compliance & Monitoring

## Compliance to this set of revised principles is due by 31 December 2022\*.

\* For a small set of countries (India and Indonesia) changing our media buying strategy requires a bit more time. Implementation in these countries will happen as soon as this is sorted.

Unilever provides mandatory training on these Principles to its marketers and agencies it engages with. The training is to ensure full understanding of Unilever's global principles and the external pledges Unilever adheres to.

In 2008, with other member companies of the International Food and Beverage Alliance (IFBA), Unilever committed to the World Health Organization (WHO) that third-party auditors would monitor the marketing and advertising principles of the IFBA members. IFBA is reporting compliance on an annual basis. Third-party monitoring is also conducted to assess compliance with national and regional pledges.

## Data Collection

Unilever does not collect personal data from children aged under 13. Local laws on age limits, if stricter, will be followed.

