

UNILEVER'S PRINCIPLES ON RESPONSIBLE FOOD AND BEVERAGE MARKETING INCLUDING MARKETING TO CHILDREN

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Marketing and advertising help us to inform people about the benefits of our products, and engage with consumers on issues that matter to them. Unilever is fully committed to responsible marketing and advertising.

In 2003, we were one of the first companies to apply our own principles to the marketing and advertising of all our food and beverage products. The Principles provide guidance to all within Unilever and have been reviewed regularly since 2003. The most recent update was published in 2017.

The General Principles are applicable to all of Unilever's food and beverage marketing activities and communications globally. They apply to all forms of marketing and advertising, which include but are not limited to:

packaging and labelling, television and radio advertising, consumer promotions, in-store activities, PR materials, online activity (including both company-owned websites and third party websites), all forms of social media and digital advertising, apps, online games and direct marketing; and all other forms of communication (e.g. cartoon characters, product placements, advergaming, free gifts/toys, etc.).

To determine if "marketing communications" are "directed to children" we will take into account the placement (e.g. media audiences – where over 35% of the audience are children below the age of 12) and the content of those communications.

We will refer to these marketing activities and communications collectively as "Marketing Communications". This term will also include new ways developed in the future to bring marketing activities and communications to consumers.

In addition to our General Principles, we also have Additional Principles for Responsible Food and Beverage Marketing to Children to ensure that we act responsibly when advertising and marketing products that appeal directly to children.





Marketing Communications must comply with all relevant laws and regulations in any country. There are also self-regulatory codes that help guide us. Our Principles are based on the International Chamber of Commerce (ICC) framework for Responsible Food and Beverage Marketing Communications. In addition, we also take into account the large network of national and local self-regulatory organisations (such as national advertising associations, television network approval guidelines, etc.) which guide us in all of the countries in which we operate.

GENERAL PRINCIPLES

Unilever will adhere to the following General Principles in all Food and Beverage Marketing Communications:

- All Marketing Communications must be truthful and not misleading.
- 2. We will strive to communicate how our brands and products fit into a healthy diet and healthy lifestyle.
- Sound and visual presentation of food products, together with how they are described, should accurately represent any material characteristics advertised and should not mislead consumers concerning any of those characteristics.
- Nutrition and health benefit claims included in any Marketing Communications should have a sound scientific basis.

- 5. Marketing Communications should not encourage or condone excess consumption and portion sizes should be appropriate to the setting portrayed and the intended consumers.
- In Marketing Communications representing meals, the foods portrayed should be shown in the context of a balanced diet.
- 7. Marketing Communications should not undermine and where possible should encourage the promotion of healthy, balanced diets and healthy active lifestyles.
- **8.** Food products not intended to be substitutes for meals should not be represented as such.





ADDITIONAL PRINCIPLES FOR RESPONSIBLE FOOD AND BEVERAGE MARKETING TO CHILDREN

The General Principles apply to all of our Marketing Communications, including those directed to children. They are designed to apply equally to traditional channels, digital channels or yet to be discovered channels. Given the limited ability of young children to understand marketing messages and the concerns about rising levels of obesity and overweight in many countries around the world, Unilever will not direct any Marketing Communications to children under the age of six. In addition, Unilever will ensure:

Highest Nutritional Standards

- All Marketing Communications directed to children between six (6) and twelve (12) years of age will by 1 January 2018 meet Unilever's Highest Nutritional Standards¹ and, where applicable, nutrition criteria of locally agreed pledges (i.e. EU Pledge) or any binding criteria set by public authorities.
- 2. Where differences in criteria exist, Unilever will apply the strictest criteria across all Marketing Communications directed to children.
- 3. We will apply the principles to all Marketing Communications which include digital communication, packaging and point of sale materials.
- 4. All our children's ice creams contain and will continue to contain 110 kilocalories or fewer per portion and meet the Highest Nutritional Standards.
- 5. We will promote fun and active lifestyles as part of our marketing campaigns.
- 6. Licensed or non-licensed cartoon characters and celebrities appealing to children aged between 6 and 12 will only be used on and in association with products meeting Unilever's Highest Nutritional Standards.

Primary Schools

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

¹ Currently, Unilever applies nutrition criteria to determine what products are appropriate for Marketing Communications directed to children. We continuously review our standards and we will move to the Highes Nutritional Standards by 1 January 2018.



8. 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 products which fulfil the requirements established under Principle 1 above.

Further Principles

- 9. Marketing Communications directed to children should not mislead about potential benefits from the consumption of a product, such as status or popularity with peers, sports success, and intelligence.
- 10. Marketing Communications should not include any direct appeal to children to persuade their parents or other adults to buy advertised products for them.
- 11. Marketing Communications should support the role of parents and other appropriate adult role models by providing guidance on the nutritional profile of products.
- 12. Marketing Communications directed to children should not create a sense of urgency, or price minimisation, for example, by using words like "now" and "only".
- 13. While fantasy, including animation, is appropriate in Marketing Communications with children, care should be taken not to exploit a child's imagination in a way that can encourage poor dietary habits.
- 14. Marketing Communications should not exploit the inexperience or credulity of children or young people. 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.
- 15. Products derived from or associated with programme content primarily directed to children should not be advertised during or adjacent to that programme.
- 16. Broadcast or print media personalities (live or animated) should not be used to sell products, premiums or services in a way that obscures the distinction between programme or editorial content and commercial promotion. For example, commercials or advertisements featuring characters from programmes or publications primarily directed to children should not be adjacent to programmes or articles in which the same personality or character appears.
- 17. No products, except those that meet Unilever's Highest Nutritional Standards, will be placed in the content of a programme directed to children aged between 6 and 12 for purposes of **promoting sale** of such products.





COMPLIANCE AND MONITORING

Unilever provides mandatory training on these Principles to its marketers and agencies. The training is key 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. As a result, since 2009, Accenture has been commissioned by IFBA members to independently audit adherence to marketing principles each year.

Third-party monitoring is also conducted to assess compliance with national and regional pledges, such as the EU Pledge.

Unilever publishes its annual compliance results for TV, print and online advertising.

DATA COLLECTION

Unilever does not collect personal data from children below 12 years of age. Unilever will only collect personal data about children below 12 years of age with the explicit consent of the parent or custodian. Local laws on age limits, if stricter, will be followed

