



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: Ben Goodman, European Counsel Brands, Telephone: + 44 161 869 5380; Marco Montanaro, Director Public and Regulatory Affairs Europe, Email: marco.montanaro@kellogg.com

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 35% or more pre-school age children (i.e., under 6 years old)
- Kellogg will not advertise foods that do not meet EU Pledge Common Nutrition Criteria on TV, print, radio, company-owned 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 EU pledge Common Nutrition Criteria on children’s’ programming, defined as any show that has a projected audience at the time media is planned of 35% or more children under 12 years old during any airing of that show. 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 35% or more children under 12 years old.
- For print media, we will not advertise products that do not meet EU Pledge Common Nutrition Criteria publications that are targeted primarily to children under 12.

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 the EU Pledge Common Nutrition Criteria in TV, print, radio, company-owned or third-party internet media directed primarily to children under 12 as specified 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 advertise in child-directed media any third-party licensed properties on products that do not meet the nutrition criteria.
- b. We will not advertise in child-directed media any licensed third-party properties as the basis for a food form/product unless that product meets the nutrition criteria.
- c. We will not advertise in child-directed media any licensed properties, which includes inserts, licensed property depictions and tie-ins, on the front panel of products that do not meet the nutrition criteria.

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) directed primarily to children under 12, regardless of whether the product meets the EU Pledge common Nutrition Criteria. 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 products which do not meet EU Pledge Common Nutrition Criteria:

- 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., ringtones, messages to kids)

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