



Children's Food and Beverage Advertising Initiative Hostess Brands Pledge

At Hostess Brands, LLC ("Hostess Brands"), we understand the importance of marketing to children in a responsible way and are proud to be a participant in the Children's Food and Beverage Advertising Initiative (CFBAI), a self-regulation program with the goal of improving the landscape of food advertising directed to children. Hostess Brands supports CFBAI's objectives and is committed to its Core Principles. Hostess Brands is pleased to submit this pledge, which reflects CFBAI's Core Principles, 6th ed. (2022). This pledge takes effect May 1, 2023.

I. Identifying Information

1. *Corporate Contact Information:*

Hostess Brands, LLC
7905 Quivira Road
Lenexa, KS 66215
www.hostessbrands.com

2. *Individual(s) responsible for overall implementation of the Pledge:*

Megan Galey
Vice President, Associate General Counsel
Hostess Brands, LLC
7905 Quivira Road
Lenexa, KS 66215
mgaley@hostessbrands.com

Lisa Mathison
Sr Director, Advertising & Digital Marketing
Hostess Brands, LLC
7905 Quivira Road
Lenexa, KS 66215
lmathison@hostessbrands.com

3. Entities covered by the Pledge: Hostess Brands, LLC on behalf of itself and its subsidiaries

4. Brand and/or product lines covered by the Pledge: Hostess Brands' pledge covers all of Hostess Brands' food products sold in the U.S., including Hostess® branded products and Voortman® branded products.

3. *Pledge Coverage:*

Hostess Brands currently does not engage in advertising primarily directed to children under 13. If Hostess Brands decides to engage in advertising primarily directed to children under age 13 in Covered Media, it commits that it will advertise only products that comply with CFBAI's Uniform Nutrition Criteria, 2nd ed. Hostess Brands will notify CFBAI of any future decision to advertise to children and provide information regarding such products to CFBAI prior to advertising them so that CFBAI can assess whether the products meet CFBAI's nutrition criteria and publicly indicate that the products qualify, and effectively monitor Hostess Brands' compliance with its Pledge.



II. Core Principles

1. *Advertising Primarily Directed to Children under Age 13*

Hostess Brands commits that all advertising primarily directed to children under age 13 in Covered Media will be for foods that meet CFBAI's Category-Specific Uniform Nutrition Criteria, 2nd ed.

2. *Covered Media*

The advertising commitment applies to the following media ("Covered Media"):

- Television
- Radio
- Print
- Internet/Digital media including but not limited to:
 - Company-owned websites
 - Third-party websites, including display, banner, pop-up, audio or video advertising¹
 - Mobile apps or mobile media, including advertising on phones, laptops, tablets, other personal digital devices, in whatever form, including email, text, IM or SMS messaging
- Platforms (e.g., YouTube) that may have content or channels that are primarily directed to children²
- Video and computer games that are primarily directed to children under age 13
- DVDs of movies that are rated "G" whose content is primarily directed to children under age 13, and other DVDs whose content is primarily directed to children under age 13
- Word of mouth.³

3. **Product Placements**

- Hostess Brands commits to not paying for or actively seeking to place its foods or beverages into third-party program or editorial content of any medium primarily directed to children under age 13 to promote the sale of those products.

4. **Product Integrations**

¹ User-generated content that is not under the control of Hostess Brands is not covered by the core commitment.

² As provided in CFBAI's Core Principles, advertising on a platform that uses valid age verification to restrict access presumptively is not primarily directed to children under age 13.

³ Word of mouth advertising refers to advertising primarily directed to children where an advertiser provides incentives (financial or otherwise), product samples, or other support to individuals or groups who are not employees to encourage such individuals or groups to discuss Hostess Brands' products.



- Hostess Brands commits that the paid for or actively sought integration of their foods or beverages in any medium primarily directed to children under age 13, including in interactive games or other digital content, will promote only foods or beverages that meet CFBAI's uniform nutrition criteria.

5. Influencers

- Hostess Brands commits to use influencers to promote foods and beverages in communications primarily directed to children under age 13 only if the foods or beverages meet CFBAI's Uniform Nutrition Criteria.

6. Licensed Characters, Celebrities and Movie Tie-Ins

- Hostess Brands commits that its use of third-party licensed characters, celebrities (including athletes) and movie tie-ins in advertising primarily directed to children under age 13 will be consistent with its advertising commitments set forth above.⁴

7. Advertising in Elementary Schools

- Hostess Brands commits to not advertising branded foods or beverages to children in elementary schools, pre-K through 6th grade. This includes but is not limited to advertising on or through the following items:
 - Posters
 - Scoreboards
 - School buses
 - Pencils, book covers, and other school supplies offered for sale in school
 - Textbooks
 - Tray liners, cups, napkins, plates
 - Coolers
 - Food samples and taste tests

This pledge commitment does not apply to displays of foods and beverages that identify foods that are for sale; fundraising support; public service messaging; curriculum materials; items given to school administrators for their personal use; charitable donations, or sponsorships.

III. Definitions of Child-Directed Advertising

Hostess Brands will use the following criteria to define advertising primarily directed to children and to demonstrate compliance with CFBAI's Core Commitments.

- Measured media. For measured media, Hostess Brands will define "advertising primarily directed to children" as advertising for which children ages 2-12 constitute at least 30% of the expected audience (the "audience threshold"). The audience demographics that determine compliance with this audience threshold will be measured in media impressions expected to be received by specific demographic

⁴ This commitment does not apply to other marketing channels, such as point-of-sale materials or packaging (provided that the packaging does not appear in advertising primarily directed to children). This commitment also does not apply to the use of company-owned characters.



groups at the time the advertising is purchased, based on reliable third-party information (e.g., Nielsen ratings for TV or comScore data for digital media).

- Digital and online media. For “contextual advertising,” which is served based on the content that is adjacent to the ad or in which the ad is placed, Hostess Brands will determine whether such content is child-directed based on an assessment of the composition of the audience for that content (if known) or, where reliable audience composition data is not available, an assessment of multiple factors related to that content.
- Where audience composition is known, Hostess Brands will consider such advertising primarily directed to children if 30% or more of the audience for the site, app, or content in which the ad is placed are children under age 13. Where audience composition data is inadequate to make this determination, such advertising will be deemed primarily directed to children if the ad is placed in content that appears to be child-directed based on an evaluation of multiple factors related to that content, including whatever age demographics for the site or digital content may be available, an assessment of the overall nature of the content, including but not limited to the subject matter of the site or video, the visual content, the language used, the kind of music or audio content, the difficulty of game play, the influencer or influencers featured in the content, actions taken to restrict children’s access to the site or content, and content identifier tools that indicate whether content is child-directed provided by platforms or content developers.
- Hostess Brands also will use age-targeting tools and interest-based or behavioral factors to avoid serving ads for foods that do not meet CFBAI’s Uniform Nutrition Criteria to children, such as:
 1. Age-targeting (based on cookie data or other age indicia) to audiences other than children;
 2. Targeting based on interest-based or behavioral data to audiences other than children;
 3. Creating an exclusion list of specific sites, channels or other content that are directed to children; and
 4. The use of relevant topic, keyword, or content classification or identification systems or filters provided by the platform owner or content developer (e.g., an app developer).

IV. ADVERTISING TO CHILDREN UNDER SIX YEARS OLD

Hostess Brands commits to not engage in advertising primarily directed to children under age six.