

Children's Food and Beverage Advertising Initiative
Keurig Dr Pepper Pledge
July 2024

Keurig Dr Pepper is pleased to submit this restated pledge, which is consistent with its previous CFBAI pledge and incorporates CFBAI's Core Principles, 7th ed. (2024).

Children's Food and Beverage Advertising Initiative (CFBAI) provides a transparent and accountable advertising self-regulation mechanism for the largest food and beverage companies in the United States. In so doing, it has played an important role in improving the landscape of food and beverage advertising directed to children and it continues to advance the discussion as products and media evolve. Keurig Dr Pepper Inc. (KDP) supports CFBAI's objectives and is committed to its Core Principles.

Building on our long-standing corporate commitment to market our products responsibly, KDP's membership in CFBAI demonstrates our commitment to building partnerships that support health and well-being. Since the School Beverage Guidelines, we've continued to pursue efforts to help Americans achieve balance. In fact, we're working on our biggest initiative to-date -- Balance Calories. Launched in 2014, we have set a goal to reduce beverage calories consumed per person nationally by 20 percent by 2025, the single-largest voluntary effort by an industry to address obesity. Through CFBAI and other partnerships, KDP is working to help our consumers achieve a healthy lifestyle by providing them with key tools including a wide a variety of beverage choices through an evolving product portfolio, nutrition information, and responsible labeling and marketing.

A. Identifying Information

1. *Corporate Contact Information:*

Keurig Dr Pepper Inc.
5301 Legacy Dr.
Plano, TX 75024
www.keurigdrpepper.com

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

Andrew Springate
Chief Marketing Officer
andrew.springate@kdrp.com
(972) 673-7513

3. *Entities covered by the Pledge:*

Keurig Dr Pepper Inc. and its Affiliate companies.

4. *Brand and/or product line covered by the Pledge:*

KDP currently does not currently engage in advertising primarily directed to children under age 13. KDP has many products that qualify under the applicable nutrition criteria. KDP agrees that it will advertise only products that comply with [CFBAI's](#)

[Uniform Nutrition Criteria, 2nd ed.](#) and the below pledge in media primarily directed to children under 13. The company will notify CFBAI of any future decision to advertise directly to children and will provide information regarding such products so that CFBAI can publicly indicate the products and effectively monitor KDP's on-going compliance with its Pledge.

B. Core Principles

• Types of Media Covered

KDP will only advertise KDP Products in media primarily directed to children under 13 if the products are in compliance with the CFBAI Category-Specific Uniform Nutrition Criteria 2nd ed. This commitment applies to advertising in the following 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 visual 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

• Use of Licensed Characters, Celebrities and Movie Tie-Ins

KDP will not advertise KDP Products which use licensed characters, celebrities (including athletes), and movie tie-ins primarily directed to children under 13 unless the KDP Products meet the CFBAI Nutrition Criteria. As stated in the CFBAI Core Principles document, this does not apply to the use of licensed characters on packaging, provided the packaging is not displayed in advertising that is primarily directed to children under 13.

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

² CFBAI refers to YouTube explicitly because it is the leading example of an open-access platform with content directed to children. CFBAI views media platforms that restrict access by children under age 13 differently. A platform's use of valid age verification to restrict access creates a presumption that an advertiser on such platforms is not intending to primarily direct its advertising to children under age 13.

³ The commitment regarding word-of-mouth advertising refers to advertising primarily directed to children under age 13 where a participant 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 the company's branded foods or beverages.

- **Product Placement**

KDP will not pay for nor consent to the placement of KDP Products, regardless of their nutrition profile, in the program/editorial content of, or as product placement in, any medium including movies, television shows, or magazines, that is primarily directed to children under 13 years old.⁴

- **Product Integrations**

KDP will not use influencers to promote foods and beverages in communications primarily directed to children under age 13.

- **Influencers**

KDP will use influencers to promote foods and beverages in communications primarily directed to children under 13 only if the foods or beverages meet CFBAI's Uniform Nutrition Criteria.

- **Interactive Games**

KDP will not advertise KDP Products in interactive games and features primarily directed to children under 13 unless the KDP Products meet the CFBAI Nutrition Criteria. This includes video and computer games rated "Early Childhood" or "EC," and video/computer games that are age graded on the label or packaging as being primarily directed to children under 13.

- **Advertising in Elementary and Middle Schools**

Regardless of its nutrition profile, KDP will not advertise its products in any pre-K through 8th Grade school. 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;

⁴ As covered in this Pledge and CFBAI's Core Principles, the term "product placement" contemplates the insertion of a product into entertainment/editorial programming in an incidental, prop-like manner. Although the product is visible, it is not incorporated into the script, story line, dialogue, or action of the scene in an integral way. The incidental nature of the product's incorporation in the entertainment content distinguishes product "placement" from product "integration."

curriculum materials; items given to school administrators for their personal use; charitable donations, or sponsorships.

Further, KDP has adhered to voluntary School Beverage Guidelines facilitated by the Alliance for a Healthier Generation and the American Beverage Association since their launch in 2006. In addition to the School Beverage Guidelines, KDP complies with the USDA's Smart Snacks program and the USDA's Local School Wellness Policy.

- **Advertising to Children Under Six**

KDP will not advertise any KDP product in any medium primarily directed to children under 6 years of age.

C. Definitions of "Primarily Directed to Children Under 13"

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

Measured Media, such as TV, radio, print and some digital: For all measured media, KDP will define advertising "primarily directed to children under 13 years old" as advertising for which children under 13 constitute at least 25% or more of the expected audience. The same metric will be applied to media purchased by KDP that is primarily directed to children 6 and under.

Audience demographic calculations will be measured in media impressions primarily directed to specific demographic groups at the time the advertising is purchased, as determined by AC Nielsen ratings for TV and Internet, SRI Research (SRI) for radio, and Simmons and MRI (Mediamark Research Inc.) data for print.

Internet websites owned by KDP and other non-measured media: For "contextual advertising," where ads may be served based on the content that is adjacent to the ad or in which the ad is placed, determining whether content is primarily directed to children under 13 will be determined based on the composition of the audience for that content (if known) or, where audience composition data is not available, an assessment of several factors as described in the CFBAI Core Principles, 6th ed., including but not limited to the content's subject matter, format, projected audience demographics, the composition of the audience to which the site is advertised. Platforms or content developers also may provide content identifier tools that indicate whether content is child-directed.

In other cases, advertising called "targeted advertising" may be served based on the characteristics of the user rather than the content the user is viewing. Advertisers or their service providers within the digital advertising ecosystem obtain information about users from multiple sources, including information that users provide directly (e.g., through online registration), information from the device(s) they use, or information about their interests that can be inferred from their online behavior. In combination, age-targeting tools and interest-based or behavioral factors help an advertiser direct an ad to those individuals that fall within a targeted age range, that are in a certain location, or that have particular interests, regardless of the content they are viewing. Advertisers also can use these tools to avoid directing an ad to a particular audience (e.g., to avoid serving an ad to children under age 13).

When engaged in this type of advertising, a participant generally will need to rely on one or more of the following tools to avoid serving ads for foods that do not meet CFBAI's Uniform Nutrition Criteria to children under age 13:

1. Age-targeting (based on cookie data or other age indicia) to audiences other than children under 13;
2. Targeting based on interest-based or behavioral data to audiences other than children under age 13;
3. Exclusion of specific sites, channels or other content that are directed to children under age 13; 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).