

## **Children’s Food and Beverage Advertising Initiative** **Unilever Pledge**

Unilever is pleased to continue its participation in the Children’s Food and Beverage Advertising Initiative (CFBAI), a self-regulation program with the goal of improving the landscape of food and beverage advertising directed to children. Unilever supports CFBAI’s objectives and is committed to its Core Principles. Unilever is pleased to submit this restated pledge, which is consistent with its previous CFBAI pledges and reflects CFBAI’s Core Principles, 7<sup>th</sup> ed. (2024). Under Unilever’s own global [Principles on Responsible Food & Beverage Marketing to Children \(“Principles”\)](#), Unilever has made additional commitments that go beyond its compliance with CFBAI’s Core Principles.<sup>1</sup> This pledge took effect June 1, 2024.

### **I. Identifying Information**

1. *Corporate Contact Information:*

Unilever United States  
700 Sylvan Ave.  
Englewood Cliffs, NJ 07632 COMPANY  
[www.UnileverUSA.com](http://www.UnileverUSA.com)

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

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*Entities covered by the Pledge:*

This pledge covers Unilever United States Nutrition and Ice Cream brands sold in the U.S. (hereafter, Unilever’s “brands”).

Unilever commits that it will adhere to its pledge below as it applies to Unilever’s brands.

### **II. Core Principles**

1. Advertising Primarily Directed to Children

Consistent with CFBAI’s Core Principles, Unilever does not advertise its brands in covered media primarily directed to children under age 13.

2. Covered media

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<sup>1</sup> Under Unilever’s Principles, its Nutrition and Ice Cream brands do not advertise to persons who are younger than sixteen (16) years of age. For purposes of compliance with Unilever’s CFBAI pledge, “children” refers to children under age 13. Unilever’s updated Principles went into effect December 31, 2022.

Unilever's CFBAI advertising commitment applies to the following media ("covered media"):<sup>2</sup>

- Television
- Radio
- Print
- Internet/Digital media<sup>3</sup>, including but not necessarily limited to:
  - Company-owned websites
  - Third-party websites, including display, banner, pop-up, audio or video advertising<sup>4</sup>
  - 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 that may have content or channels that are primarily directed to children.
- Video and computer games that are primarily directed to children.
- DVDs of movies whose content is primarily directed to children, and other DVDs whose content is primarily directed to children.
- Word of mouth.<sup>5</sup>

### 3. Product Placements

Unilever commits to not paying for or actively seeking to place its brands and products into third-party program or editorial content of any medium primarily directed to children to promote the sale of those products.<sup>6</sup>

### 4. Product Integrations

Unilever commits that it will not pay for or actively seek to integrate its brands and products in any medium primarily directed to children, including in interactive games or other digital content.

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<sup>2</sup> This pledge 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.

<sup>3</sup> This is consistent with Unilever's Principles, pursuant to which Unilever will not intentionally direct any marketing communications to persons under the age of 16 for digital platforms. .

<sup>4</sup> User-generated content that is not under the control of Unilever is not covered by the Core Commitments.

<sup>5</sup> The commitment regarding word-of-mouth advertising refers to advertising primarily directed to children 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.

<sup>6</sup> As covered in this pledge, 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."

## 5. Influencers

Unilever commits to not use influencers in communications primarily directed to children.<sup>7</sup>

## 6. Licensed Characters, Celebrities and Movie Tie-Ins

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

## 7. Advertising in Schools

Unilever commits to not advertising its brands or products to children in elementary schools through high school (i.e., pre-K through 12<sup>th</sup> 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 commitment does not apply to displays of foods and beverages that identify foods that are for sale; fundraising support; public service messaging<sup>8</sup>; curriculum materials; items given to school administrators for their personal use; charitable donations, or sponsorships.

### **III. Definitions of Child-Directed Advertising**

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

Measured media. For measured media, Unilever will define "advertising primarily directed to children" as advertising for which children constitute at least 25% 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 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).

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<sup>7</sup> Under the Principles, Unilever commits to not use influencers who are under the age of 16 and defines "influencers" as third-party endorsers such as celebrities, disruptors, social media stars, subject matter experts and editors/journalists. Licensed characters and brand equity characters are not included in its definition of influencers.

<sup>8</sup> Unilever may participate in campaigns for education purposes. This commitment does not prohibit identification of corporate sponsorship to ensure transparency.

Like others in the industry, Unilever purchases the majority of television advertising in dayparts, in advance of when the advertising will air. Advertising placed in purchased dayparts or timeblocks will be identified as compliant for purposes of CFBAI based on an analysis of the annualized audience composition data for the block of time purchased.

Digital and online media. Unilever considers the target demographic based on the media plan in line with digital platform policies. For “contextual advertising,” which is served based on the content that is adjacent to the ad or in which the ad is placed, Unilever 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, Unilever will define “advertising primarily directed to children” as advertising for which 25% or more of the audience for the site, app, or content in which the ad is placed are children.

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 the following factors related to that content: 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.

Other digital advertising (not “contextual advertising”) is targeted to the audience for that ad in a variety of ways. Unilever will meet its CFBAI commitments when placing such “targeted advertising” by using reliable age-targeting tactics and/or other interest-based or behavioral factors to avoid serving ads for foods to children. These tactics include:

1. Age-targeting (based on cookie data or other age indicia) ;
2. Targeting based on interest-based or behavioral data ;
3. Exclusion of specific sites, channels or other content; 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**

Unilever commits to not engaging in advertising primarily directed to children under six. Unilever has not done so since April 2006.