

Cloetta's Responsible Marketing Policy



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Cloetta's purpose is "We believe in the Power of True Joy", which means that our products should play a positive part in adding joyful moments to people's daily lives.

Responsible marketing is embedded in our group-wide sustainability agenda that focuses on creating joy and long-lasting value **For You, For People and For the Planet**.

We are committed to **the responsible marketing** of our products and want to be a positive role model in our industry and communities with our marketing practices. We are committed not to target individuals under 18 years old through directed paid media.

Cloetta contributes to oral healthcare by promoting **sugar free** chewing gum and (xylitol) pastilles/mints. Therefore, these product categories are excluded from this commitment. Also packaging and POS are excluded from this scope.

Cloetta's Responsible Marketing Policy sets out the principles guiding Cloetta's marketing communications across the countries in which Cloetta has presence. Cloetta adheres to **applicable local laws and regulations** as well as taking into consideration the industry-specific agreements such as the International Chamber of Commerce (ICC) framework for responsible food and beverage communications, the EU Pledge and the European Brands Association, which shall take precedence over this policy. This policy can however include stricter restrictions than the applicable local laws and regulations.



General Principles



- 1** Cloetta strives to develop marketing communications and advertising that promotes **positive values** and social behaviour, including kindness, fairness, respect for others, and avoiding social irresponsible behaviour or language. Our advertising strives to include a cross section of genders and ethnic backgrounds.
- 2** We will direct our marketing communications **to adults** who make household purchasing decisions, both in terms of ad content and media purchasing.
- 3** Cloetta strives to show products in realistic situations in portion sizes which fit a balanced lifestyle for the occasion. Our marketing communications will reflect and stimulate **responsible consumption**.
- 4** Our relevant employees are **fully aware** of our policy, and we will train our existing and future marketing communications, paid media and creative partners to respect our Responsible Marketing Policy.
- 5** Nutrition and health claims used in marketing communications are based on **research and legislation**.
- 6** Cloetta complies with all governing, supplementary and ancillary **laws, ordinances and standards** imposed by applicable local regulation.

Marketing to Children



- 1** Cloetta will not intentionally direct any marketing communications for our products primarily to individuals under 18 through **paid media channels**, including TV, print, websites, social media, movies, and SMS/email marketing). For the purpose of this initiative, “advertising to individuals under 18 years” means advertising to media audiences with a minimum of 30% of children under 18 years.
- 2** The **creative execution** of Cloetta’s marketing communications is designed to be directed to adults which includes the overall impression of the advertising. We will not use visuals or language that would encourage children to persuade their parents or others to purchase the advertised product.
- 3** Cloetta’s marketing activities will not use **claims** directed towards children such as that the consumption of a product will give a child physical, social or psychological advantages compared to those who have not consumed the product.
- 4** In our marketing communications for confectionery products, we may show children if relevant to the message, e.g. a family situation. **Parents** or gatekeepers will always be portrayed in control of the access to a product.
- 5** We will not use an **influencer, celebrity or licensed animated character** intended to appeal primarily to children under 13.
- 6** For promoting our confectionery products we do not collaborate with

Marketing to Children



- 7 Product donations**
Charitable events: Cloetta donates products at our discretion for charitable purposes.
Commercial events: We do not donate confectionery products to events where the majority of participants are under 13 years of age.
Any event: When donating products at events where children under 13 are present, we will seek parents' or responsible adults' consent.
- 8** We will not give **branded sponsorship** to sports or events which primarily target children under 13.
- 9** We will not sponsor or undertake **product placement** in movies or TV shows where the intended audience is primarily children under 13.
- 10** We will not run marketing communications with **licensed brand characters** that appeal to children under 13 in our confectionery products
- 11** Cloetta will not commercially advertise our confectionery products in **schools** for children under 13
- 12** If we **license our brand names**, logos, or any other trademarks to third parties, we will require that these parties follow our Responsible Marketing policy including compliance with all applicable local laws, regulations and industry specific standards.
- 13** Our **merchandise** is not designed or promoted with the intent of appealing to individuals under 18.