

A SWEETER
FUTURE



FOR
PEOPLE

Cloetta's Responsible Marketing Policy



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Cloetta's purpose is "We believe in the Power of True Joy" and is about our products playing a positive part in adding that special touch to people's daily lives. When they savor Cloetta's products, people experience a moment of true joy.

Responsible marketing is embedded in our sustainability agenda "**A Sweeter Future**" 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 communities with our marketing practices. With regards to advertising to children, we are committed not to advertise to **kids under 13 years old**.

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 is **consistent with current legislation** in countries in which Cloetta has presence. The guideline also takes into consideration 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.



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1. General Principles

The following general principles will apply to all Cloetta marketing communications.

- 1** Cloetta strives to develop advertising that promotes **positive values** and social behavior, including kindness, fairness, respect for others and avoid any social irresponsible behaviour and use of 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 (gatekeepers) and young **people 13 and over**, 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 communication will reflect & stimulate **responsible consumption**.
- 4** Our relevant employees are fully aware of our policy and **we will train our existing and future media and creative partners** to respect our Responsible Marketing Policy.
- 5** Nutrition and health claims used in communication are **based on research and legislation**.
- 6** Cloetta complies with all governing, supplementary and ancillary **laws, ordinances and standards** imposed by applicable local regulation.



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2. Marketing to Kids

The following specific principles will apply to all Cloetta marketing communications and in particular steering our compliance not advertising to children under the age of 13

- 1** Cloetta **will not direct** any marketing communications for our products primarily to **children under 13** in our media buying (including TV, print, websites, social media, movies and SMS/email marketing). For the purpose of this initiative, "advertising to children under 13 years" means advertising to media audiences with a minimum of 30% of children under 13 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 under the age of 13 to persuade their parents or others to purchase the advertised product.
- 3** Cloetta's marketing activities will not suggest that the consumption of a product will give a child a physical, social or psychological **advantages over other children** who have not consumed the product.
- 4** Confectionery products in our marketing communications. We may show children under 13 in our marketing communication 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** in our marketing communication for our confectionery products.
- 6** For promoting our confectionery products we do not collaborate **with influencers or celebrities under the age of 18.**



Product donations:

Charitable events: Cloetta donates products at our discretion for charitable purposes.

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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 kids under 13 are present, we will seek parents' or responsible adult's consent.

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We will not give branded sponsorship to sports or events which primarily **target kids under 13.**

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We will not sponsor or undertake product placement in movies or TV shows where the intended **audience is primarily children under 13.**

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We will not run communication with licensed brand **characters that appeal to kids under 13** in our confectionery products

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Cloetta will not commercially advertise our confectionery products in schools for kids under 13

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If we **license** our brand names or logos to third parties, we will require that these parties **follow our Responsible Marketing policy**