



**Children’s Food and Beverage Advertising Initiative**  
**Kellanova Pledge**

Kellanova (formerly Kellogg Company) is proud to be a charter member of 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 in the United States. Kellanova supports CFBAI’s objectives and is committed to its Core Principles. Kellanova is pleased to submit this restated pledge, which is consistent with previous CFBAI pledges and reflects CFBAI’s Core Principles, 6<sup>th</sup> ed. (2022). This pledge takes effect January 1, 2024.

**I. Identifying Information**

1. *Corporate Contact Information:*

Kellanova  
412 North Wells Street  
Chicago, IL 60654  
[www.kellanova.com](http://www.kellanova.com)

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

Christine Corcoran  
Senior Director, Global and U.S. Government Relations  
801 Pennsylvania Avenue, Suite 305  
Washington, DC 20004  
[christine.corcoran@kellanova.com](mailto:christine.corcoran@kellanova.com)  
202-624-3903

Anya Bogusky  
Counsel  
412 N. Wells Street  
Chicago, IL 60654  
[Anya.bogusky@kellanova.com](mailto:Anya.bogusky@kellanova.com)  
630-568-2580

3. *Entities covered by the Pledge:*

All U.S.-based businesses of Kellanova.

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

The pledge covers Kellanova’s U.S. food products.

Kellanova does not advertise in media primarily directed to children under age six. Kellanova commits that it will advertise only products that comply with CFBAI’s nutrition criteria in advertising primarily directed to children ages six to 12 in accordance with this Pledge. Kellanova will provide information regarding such products to CFBAI prior to advertising them so that CFBAI can assess

whether the products meet CFBAI's nutrition criteria, publicly indicate that the products qualify, and effectively monitor Kellanova's compliance with its Pledge.

## **II. Core Principles**

### **1. Advertising primarily directed to children under age 13**

Kellanova commits that advertising primarily directed to children ages 6 to 12 in covered media will be for foods that meet CFBAI's Category-Specific Uniform Nutrition Criteria, 2<sup>nd</sup> ed.

### **2. Covered media**

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

- Television
- Radio
- Print
- Internet/Digital media, including but not necessarily limited to:
  - Company-owned websites
  - Third-party websites, including display, banner, pop-up, audio or video advertising<sup>1</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 (e.g., YouTube) that may have content or channels that are primarily directed to children<sup>2</sup>
- Video and computer games that are primarily directed to children under age 13
- DVDs of movies 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<sup>3</sup>

### **3. Product Placements**

Kellanova commits to not paying for or actively seeking to place its foods into third-party program or editorial content of any medium primarily directed to children under age 13 to promote the sale of those products.<sup>4</sup>

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<sup>1</sup> User-generated content that is not under the control of Kellanova is not covered by the Core Principles and Commitments.

<sup>2</sup> 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.

<sup>3</sup> 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 advertiser's products.

<sup>4</sup> As provided in the 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."

#### 4. **Product Integrations**

Kellanova commits that the paid for actively sought integration of its foods in any medium primarily directed to children under age 13, including in interactive games or other digital content, will promote only foods that meet CFBAI's Uniform Nutrition Criteria.

#### 5. **Influencers**

Kellanova commits to use influencers to promote foods in communications primarily directed to children under age 13 only if those foods meet CFBAI's Uniform Nutrition Criteria.

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

Kellanova 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 in above.<sup>5</sup>

#### 7. **Advertising in Elementary Schools**

Kellanova commits to not advertising its foods to children in elementary schools. 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 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**

Kellanova 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, Kellanova 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 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>5</sup> 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 under age 13). This commitment also does not apply to the use of Kellanova-owned characters.

Kellanova typically purchases television advertising once annually, well in advance of when the advertising will air, on a daypart or timeblock basis. 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: For “contextual advertising,” which is served based on the content that is adjacent to the ad or in which the ad is placed, Kellanova 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, Kellanova 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 contextual 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.

Other digital advertising (not “contextual advertising”) is targeted to the audience for that ad in a variety of ways. Kellanova will meet its CFBAI commitments when placing such “targeted advertising” by using reliable age-targeting tools and/or other interest-based or behavioral factors to avoid serving ads for foods that do not meet CFBAI’s Uniform Nutrition Criteria to children under age 13. These tools include:

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. Blacklisting of specific sites, channels or other content that are directed to children; and/or
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**

Kellanova commits to not engaging in advertising primarily directed to children under age six.