

KELLOGG COMPANY

Worldwide
Marketing
&
Communication
Guidelines



Kellogg's

Kellogg Company

www.kelloggcompany.com

As marketers, we enjoy the opportunity to communicate with our consumers, at the same time this brings important responsibilities. We recognize that these guidelines cannot address every situation or question that will arise, however it is our aim to operate within both the spirit and letter of these commitments, in order to continue our heritage of ethical business practices.

These Guidelines are intended to supplement, not replace, our existing obligations under local regulations or self-regulatory programs in which Kellogg participates. Those programs may impose additional or more stringent limitations.

Compliance with those regulations and commitments should take precedence over these Guidelines where market rules are more stringent. Where no regulations or commitments are in place in a market, or the regulations and commitments in place are less stringent than these Guidelines, these Guidelines will serve as our operating principles.

GENERAL PRINCIPLES

We are as committed today to protecting and promoting consumer confidence in our products as our founder, W.K. Kellogg, was when he had his name placed on every product as his personal assurance of quality. Key to that understanding is our commitment to responsibly market our brands and communicate their intrinsic qualities so that our consumer can make informed choices.

To ensure that we have high uniform standards of marketing and communication across the world, these updated Guidelines are the basis for all of our consumer communication. We understand that consumer values or customs vary from country to country. However, we believe that the basis of the principles offered here provide sound guidance for Kellogg marketing and consumer communication, no matter where in the world our consumers live. As such, we are committed to using these principles to guide us in all communication with our consumers.



1. Advertising is a means to build our brands, and we are committed to advertising that is truthful and not misleading to consumers. All of our communication will reflect the good taste, fair practice, and objectivity that guide our corporate actions.
2. We will not engage in political debates in our advertising content and placement.
3. Our marketing practices will comply with the laws and decisions of regulatory authorities in each country where we conduct business. Our marketing practices will further comply with any self-regulatory and/or "Pledge" programs in which we participate.

GENERAL PRINCIPLES

4. Our marketing and advertising programs will take care to respect the ethics and values particular to consumers in that country.
5. We recognize that a consumer's choice of diet and level of physical activity can impact their general health and well-being and believe we can have a positive influence by encouraging a varied diet, proper eating habits, and physical activity.
6. Our messages to children will accurately portray our products, promotions and premiums in a way that is in keeping with their ability to understand, and will use language that is appropriate for this audience.
7. In our dealings with schools, we believe in supporting the efforts of relevant school programs by offering balanced solutions to health and nutrition issues while encouraging students to practice healthy eating habits.
8. We believe that consumers have a right to privacy and our marketing practices, including marketing in digital media, will comply with all applicable laws, regulations, and self-regulatory guidelines relating to privacy disclosures, permission marketing, and collection and use of personally identifiable information.
9. We will place our advertising in an environment that reflects the positive image of our brands. We will not sponsor or place advertising on television and radio programs, in magazines or on digital media where the strategy for attracting viewers or readers rely on exploiting violence or sex, or encourages offensive behavior to others, or where the media is not consistent with our product or corporate image, taking into account local market standards and practices.

GENERAL PRINCIPLES

10. We promote our brands in a global market and our marketing programs created throughout the world are governed by the following specific Guidelines. These Guidelines are not meant to supersede or displace any existing local regulatory, self-regulatory or Pledge program commitments that may be more stringent.

MARKETING TO ALL CONSUMERS

We will comply with all applicable laws and regulations, including adherence to applicable industry self-regulatory and statutory guidelines. Our advertising and marketing programs will not undermine human dignity by belittling or disparaging any group or person based on social, racial, ethnic, religious, gender, age or physical traits.

- Our advertising will not exploit the misfortunes of others, display vulgarity, bad manners, or offensive behavior.
- Our communications will support sensible portion control. Appropriate portion sizes will be displayed and we will not depict or encourage excessive consumption. For instance we will not use words like “super-size” or “king-size.”
- Packaging formats designed for portability (e.g. single serving packages or portable packages with more than one serving) will, where allowable and workable, show the nutrition facts for the recommended serving size and/or nutrition facts for the entire package if the package exceeds the recommended serving size (or reference amount customarily consumed) and it is reasonable to expect that the product will be consumed in one eating occasion as determined by specific country rules.
- Our goal is to provide consumers of all ages with helpful information to assist them in choosing diets and levels of physical activity that can positively impact their health and well-being. Our advertising will not encourage or promote inactive lifestyles or unhealthy eating habits.



- ✦ The visual presentation of our food in our advertisements will accurately represent all material characteristics advertised, including taste, size, content, and nutrition and health benefits.
- ✦ All product content, comparative and health claims will be accurate and appropriately substantiated and will be stated in accordance with local market law and regulations.

In addition to the above Guidelines applicable to all consumers, in June 2007 we further strengthened our commitment to communicating responsibly to children. We adopted the Kellogg Global Nutrient Criteria (“KGNC”) to shift the mix of products we advertised globally to children under 12 years old. Unless otherwise specified, all of the commitments outlined in this section must be operational by no later than January 1, 2009.

Preschool Age Children: we will continue our practice of not advertising to preschool age children (i.e. where audience composition is 50% or more children under 6 years old, or where audience composition data is not available, the advertising is directed to audiences comprised primarily of children under 6 years old).

KGNC

The KGNC are:

- No more than 200 calories per serving
- No more than 2g saturated fat/0g trans fat per serving
- No more than 230mg of sodium per serving (for Eggo™ frozen waffle/products, the maximum allowable level of sodium under the KGNC is 20% DV (460mg) since these products are typically served as entrees and approximately 50% of the sodium is attributed to the leavening agent necessary to the functionality and form of the food.)
- No more than 12.5g (labeled 12g) of sugars per serving (excluding sugars from fruit and dairy)



TELEVISION, RADIO, PRINT and THIRD-PARTY DIGITAL MEDIA

Television, Radio and Third-Party Digital Media: we will not advertise foods that do not meet the KGNC on TV, radio or third-party digital media on core children's programming which is directed primarily to children 6-11. "Directed primarily to children 6-11" generally means media which has a projected audience at the time of media purchase of 50% or more children under 12, unless local market regulations or commitments require a lower or different audience composition standard. Where under-12 percentage audience data is not maintained or available in a particular market, we will not advertise non-KGNC compliant products in media that is specifically designed to appeal to, or which is targeted primarily to, children under 12.

- **Print Media:** we will not advertise non-KGNC compliant products in publications that are specifically designed to appeal to, or which are targeted primarily to, children under 12.

- **Product Sponsorship:** in applying these limits, sponsorship by specific products is treated as "advertising", meaning that product (vs. generic "brought to you by Kellogg Company") sponsorship in any of these media, subject to the definitions of "directed primarily to children 6-11" can only be done by brands that meet the KGNC.

KELLOGG-OWNED OR KELLOGG-SPONSORED DIGITAL MEDIA

- **Third-Party Digital Media/Internet Sites:** as stated above, we will not advertise products that do not meet the KGNC on third-party digital media/internet sites and webpages which have a projected audience at the time of media purchase of 50% or more children under 12.

- **Access to Sites Featuring Non-KGNC Products:** we will take steps to limit access by children under 12 to Kellogg-owned or Kellogg-sponsored digital media/internet sites and webpages that are primarily directed to, or contain content designed to appeal primarily to, kids under 12, which feature products that do not meet the KGNC, such as age-screening devices and/or parental consent options.

• **Content Changes Specific to Digital Media Featuring Non-KGNC Products:** on all Kellogg-owned or Kellogg-sponsored digital media/internet sites and webpages featuring products that do not meet the KGNC, we will:

1. not place on these sites clips or downloads of commercials run in mass media that are not allowed to be directed in mass media to children under 12; and

2. where products (e.g., foods, brand logos, packaging) are themselves integrated into an online interactive activity (including downloads, wallpapers and games), we will only depict those products which meet the KGNC in those types of games. This limitation does not apply to existing Kellogg equity characters that are themselves food forms (e.g., EggoMan or Pop_Tarts Crazy Good characters).

• **Content Changes on All Child-Directed Digital Media:** on all Kellogg-owned digital media that contain copy or content specifically designed to appeal to, or which is targeted primarily to, children under 12, we will:

1. include an automatic use break feature which interrupts screentime after 15 continuous minutes; and

2. include healthy lifestyle messaging (i.e., energy balance, activity, nutrition).

Privacy and Other Protections: if advertising to children is allowed on digital media under these guidelines, please refer to the “Digital Media” section of the guidelines for additional requirements.



USE OF LICENSED PROPERTIES

The following rules apply specifically to the use of third-party licensed properties (e.g., characters, games, toys, movies, etc.) per agreements entered into after June 2007:

We will not use third-party licensed properties in advertisements on mass media, or on Kellogg-owned or Kellogg-controlled digital media directed primarily to children under 12 in connection with products that do not meet the KGNC.

We will not use licensed third-party properties as the basis for a food form/product unless that product meets the KGNC.

We will not use child-directed marketing that features licensed properties, which includes inserts, licensed property depictions and tie-ins, on the front panel of products that do not meet the KGNC.

These limitations are intended to apply if either the licensed property itself, or the promotion involved, is targeted to, or is designed primarily to appeal to, children under 12.

These limitations also apply to in-store displays and other in-store promotions featuring licensed properties which are primarily directed at, or which are designed primarily to appeal to, children under 12.

KELLOGG-OWNED CHARACTER VISITS

Kellogg-owned character visits (e.g., Tony the Tiger, Toucan Sam, etc.) are permissible at events and in stores, but if the character is associated with a non-KGNC product, the focus of the character's visit or activities (for example, handing out items, samples, coupons, etc.) must be adult (vs. child) targeted.

BRAND SPONSORSHIP OF EVENTS, LOCATIONS, ETC.

- If an event or location (e.g., theme parks, booths, tents) is targeted to reach an audience of primarily children under 12, and parents would generally not be expected to accompany those children at the event or location, then only brands that meet the KGNC can engage in that sponsorship or participate in that event.
- If product sampling is occurring at these events or locations, only products that meet the KGNC may be handed out to children under 12. Products that do not meet parent (or adult accompanying the child) consents. Products that do not meet the KGNC may still be handed out to adults.



OTHER MARKETING / MEDIA

We are committed to not using the following activities/techniques directed to children under 12 for non-KGNC products:

- We will not pay for or seek out promotional product placement (i.e., embedding our products within program or editorial content, as distinguished from general “Kellogg Company” sponsorship) for any product in any medium (such as video games, TV shows, books, movies) specifically designed to appeal to, or directed primarily to, children under 12, regardless of whether the product meets the KGNC. This limitation helps to ensure that there is not confusion for children as to where program content ends and advertising begins.
- Celebrity spokespersons who are related to or affiliated with mass media that itself is directed primarily to children under 12 (e.g., stars from sit-com-type program targeted to children under 12)
- Viral marketing directed primarily to children under 12 (e.g., “forward to a friend” or e-card messages)
- Product-branded (vs. generic Kellogg Company) toys and games sold for, or distributed to, children under 12 (e.g., licensed toys and games sold at retail)
Product (vs. generic Kellogg Company) sponsorship of “kids clubs” or other children’s commitments
- Marketing messages directed to or using children’s cell phones (i.e., ring tones, messages to kids)

SCHOOLS

School marketing is covered in the section of the guidelines entitled “Marketing to Schools.”

PREMIUMS/PROMOTIONS

Marketing to children using premiums, promotions, contests and sweepstakes is covered in the section of the guidelines entitled “Premiums, Promotions, Contests and Sweepstakes.”

GENERAL CONTENT

- Our messages to children will accurately portray our products in a way that is keeping with children’s ability to understand our intent and use language that is appropriate for this audience.
- We will avoid advertising and marketing themes that portray adults and children in anti-social situations, engaged in acts harmful to themselves or to others, or include violence or sexual innuendo. A responsible and trustworthy figure will be present/depicted with children when the products or activities portrayed could involve a safety risk. Appropriate safety gear will be depicted for all physical activities according to guidelines published by locally recognized sports or safety associations. In advertisements relying on animation to communicate our message, our trademarked characters may be used as trustworthy figures, where allowed by local regulations and/or self-regulatory guidelines.
- Our communication will offer clear and appropriate nutrition information and will not mislead children to believe that consumption of the product will directly result in changes such as popularity, intelligence or athletic ability.

- We will not undermine the authority, responsibility or judgment of parents or caregivers in providing valuable guidance to their families.
- As demonstrated in our Global Breakfast Guidelines, we are committed to educating children on the importance of maintaining a nutritious breakfast as part of a balanced diet, in a fun and entertaining manner. When a breakfast communication (i.e., any communication that depicts, describes, states or implies the breakfast occasions (expls., sunrise, activities carried out at the start of the day, family sitting around a table for a breakfast meal) is directed primarily to children under 12, a visual and/or graphic of a balanced (nutritious) breakfast meal, as defined in our Breakfast Guidelines, is required, subject to local market regulations and requirements.
- Advertisements directed to children must show sound nutritional practices where applicable (i.e., showing a nutritionally balanced meal when we have meal shots; not suggesting that a snack should take the place of a balanced meal.)
- Advertisements directed to children will not depict or encourage excessive consumption.
- We will continually look for opportunities, including use of our characters where permitted, to encourage physical activity/exercise in our child-directed communication and initiatives.



- We will be mindful not to create an undue sense of urgency in advertising to children. We will not use words with negative connotations, like “pester” or “nag,” to encourage children to put inappropriate pressure on their parents to purchase our products, or which disparage parental choices and decisions.
- We will use language appropriate to the circumstance portrayed and will avoid use of offensive, derogatory, disparaging or obscene language that is subject to the same interpretation.
- The use of any Kellogg characters in any Kellogg communication must be consistent with these guidelines.
- Advertising should be distinguished from program content. Advertisements for KGNC products, directed primarily to children under 12, in which personalities or characters from programs or publications are used, should not be placed or run adjacent to programs or articles in which the same personality or character appears.

MARKETING TO SCHOOLS

- We will strive to offer a range of products to schools that meet the health and taste preferences of the student population and will supply these only with the prior approval of the appropriate school officials.
- We will not advertise directly to children in schools where students are below age 12 (i.e., elementary or preschool settings).
- For these purposes “direct advertising” is activity intended to influence children with respect to Kellogg brands/products and includes product branded activities/items such as brand sponsorship of events/activities, book covers, stickers, posters, coupons, clothing, magazines or other print publications, premiums, sporting equipment, other school equipment/supplies, signage in schools, product sampling and Kellogg equity character visits. We will continue to use our equity characters on packaging for foods we sell into schools.
- “Direct advertising” does not include displays used to hold our products, charitable fund raising, public service messaging and items given to school administrators, so long as such activities or items are not product branded and, do not depict any Kellogg equity or third-party licensed characters. These items may incorporate the “Kellogg” corporate name, so long as featuring of that corporate name is not the primary or predominant focus of the activity. These exempt activities are further limited to nutrition, education and/or physical initiatives.

MARKETING TO SCHOOLS

- For all other schools (i.e., with students 12 or older), subject to school rules and permission, and subject to our other Guidelines, activities directed to students or which are likely to reach or engage students, must relate to nutrition, education and/or physical activity initiatives. Product sampling and product-related research in schools with children over 12 years old can only be conducted for the purposes above (vs. for a commercial purpose) and, for research, only with the express consent of both school administration and parents of participating students prior to the activity.
- All activity in schools will strictly adhere to local regulatory, self-regulatory and school guidelines, and will be conducted only with the express approval of school administrators.



PREMIUMS, CONTESTS, PROMOTIONS & SWEEPSTAKES

- When entering into promotion partnerships with entities outside of Kellogg, we will make every effort to select properties that are consistent with the image and reputation of our company.
- Conditions of offers, contests, promotions and sweepstakes will be stated simply and clearly.
- To ensure that consumers know it is not our intent to drive purchases excessively or encourage unhealthy eating behavior, premium purchase requirements will reflect realistic product consumption for the time-frame of the promotion. In addition, if we encourage consumers to “complete or collect a set,” we will take care to align the quantity in the set with a reasonable number of purchases during the life of the offer or we will provide an alternate way to receive it.
- If contests are used, we will publish clear, complete and concise rules and provide competent impartial judges to determine the winners.
- If offering video, films, music or interactive software, we will take care that the products selected are age appropriate for the brands on which they are advertised or offered. If any industry rating system is available, a rating label will be prominently displayed in our advertising or on our packaging.

PREMIUMS, CONTESTS, PROMOTIONS & SWEEPSTAKES

We understand that the use of premiums, contests, promotions, and sweepstakes in advertising has the potential to enhance the appeal of a product to a child. Therefore, we will give special care to the use of these marketing techniques with children below the age of 12, which apply in addition to the Guidelines applicable generally to promotions to children under 12 as provided in the “Marketing to Children” section above (e.g., licensed character use, front of pack marketing limits, etc.):

- “Mandatory” statements and disclosures will be stated in terms that can be understood by the child audience
- We will not use any premiums/inserts targeted primarily to, or designed to appeal to, children under 12 in products that do not meet the KGNC
- Brands that are KGNC compliant may not give away Kellogg products that are not KGNC compliant as prizes or free samples as part of any child-directed promotion
- For free-in-mail or self-liquidating offers targeted primarily or designed to appeal primarily to children under 12, for non-KGNC products no more than two purchases for redemption may be claimed
- In advertising sweepstakes to children, care will be taken not to produce unrealistic expectations of the chances of winning, or inflated expectations of the prize(s) to be won
- The prizes will be clearly depicted, including relative size. A disclaimer will be included in the ad if the prize depiction is larger than its usual size or if the picture is for illustrative purposes only (e.g., “Actual prizes may vary”)
- The number of level of each tier for every prize being awarded will be clearly disclosed in language understandable to the children audience
- All prizes will be appropriate to the child audience
- Alternate means of entry, if available, will be disclosed

The Guidelines described throughout this document also apply to our digital marketing programs. We recognize that specific Guidelines or policies regarding the use of digital marketing may differ from market to market on a worldwide basis. It is necessary, therefore, that our digital marketing practices also comply with the laws, regulations and self-regulatory programs applicable to each individual market. This includes adherence to industry self-regulatory and statutory guidelines that relate to privacy disclosures, permission marketing, and gathering of personally identifiable information from users.

These Guidelines apply to content created or sponsored by Kellogg on either a Kellogg digital or a Kellogg-sponsored section or advertisement on third-party digital media. While it is impossible to completely control consumer generated content on Kellogg digital media or Kellogg-sponsored digital media, these Guidelines include criteria which are intended to minimize the potential for consumers to post content which does not fit within acceptable boundaries:

- All content will clearly identify the sponsoring company or brand and include links to contact information, privacy policy, and terms and conditions of participation. This information should be written in a manner that is clear and easy for users to understand.
- The privacy policy will include a disclosure on data collection, sharing, and retention practices including data collected through passive means, click-stream tracking (e.g., cookies, IP address, navigational etc.) and age-screening and/or parental permission practices. These disclosures should be consistent with local laws, regulations and self-regulatory programs in which we participate.
- Promotional contests and sweepstakes websites will identify how to participate with and without a purchase, and include a link to complete rules. In addition, any other information required by local regulation will be included.



DIGITAL MARKETING



- When partnering with a third-party to develop, deliver or host any interactive content, the partner must agree to comply with Kellogg policies and commitments, including, but not limited to Kellogg's Worldwide Marketing and Communication Guidelines, the CBBB Children's Food and Beverage Advertising Initiative and similar Pledge programs around the world in which we participate, Kellogg Advertising Review and Approval processes, local regulatory and self-regulatory practices related to the content covered by the agreement. Partner sites must also meet Kellogg advertising placement criteria as provided in Item 8 of our "General Principles" above.
- Monitoring, auditing, issues management, intervention (including exit strategy) and complaint handling procedures will be defined and agreed upon with digital partners prior to launch. These should include means to prohibit or quickly remove any materials inappropriate to the posted community purpose including but not limited to: false and defamatory information; material protected by copyright, trademark or other proprietary right; personal advertisements or links to websites selling goods or services; postings that are off-topic or with no reason relative to the community; personally identifiable information; content that Kellogg deems abusive, sexually explicit, violent, vulgar, offensive, discriminatory, hateful or content that is threatening or encourages acts harmful to themselves or others; violation of individual rights of privacy; posts that violate law or encourage violation of law; any other information that we deem inappropriate for the site.
- When a virtual community or other consumer interactive forum where consumers can communicate or interact with other consumers in sharing content they create, we will:
 - Develop and post community guidelines that define parameters of acceptable participation.
 - Provide a description of purpose and topics and/or content to be shared.

- Require registration, including age-screener, click to agree to community guidelines, and ability to block access or terminate participation for breach of agreement.
- Monitor or manage through a community-based self-monitoring process with means to appropriately resolve concerns in a timely manner.
- Prohibit the use of any shill tactics (e.g., posting by agents or undisclosed Kellogg employees, seeding content, etc.) that could be construed as misleading, deceptive, untrue or persuade a consumer towards a desired action. At all times Kellogg employee and partner participation must be transparent to the consumer.
- Viral communications, such as refer a friend or e-card programs, will incorporate a profanity screening mechanism on all open-text fields; any email addresses submitted will be used only once for the intended purpose and will not be stored for any subsequent use.
- E-commerce sites will be restricted to consumers 18 years of age and up
Cancellation and merchandise return/exchange instructions will be prominently posted. All personally identifiable information including financial payment information, will be encrypted and the transfer and storage of information secured following, but not limited to, Payment Card Industry (PCI) best practices.
- Where style guides exists, these should be used in designing the website



- When the Guidelines applicable to digital media under “Marketing to Children” allow digital marketing to children under 12, the following additional guidelines apply to websites and content directed primarily to children under 12:
- Where products are featured in games or other online_interactive activities directed to children 12 years old or under, this activity will be identified as an “advertisement.”
- Parental consent is required for all community activities for children 12 years old or under and must be obtained prior to requesting personally identifiable information.
- It will be made evident to the consumer when they are linking to a third-party site from a Kellogg site by providing descriptive link copy (for example: “available at Yahoo.com”), a pop-up exit notice or opening the third-party site in a new browser window.
- No identifiable information (e.g., full name, mailing address and/or telephone number) should be collected unless (1) necessary to fulfill a prize/award or information sent by mail: or (2) to otherwise comply with local regulations. We will not allow sharing of any personally_ identifiable information.
- When requesting information from a child 12 years old or under, we will include a disclosure in language understandable by a child as to why we are requesting the information and whether we intend to share the information and how (e.g., “we will use your name and email address to enter you in this sweepstakes and to add you to our mailing list. We will not share this information with anyone or use it for any other purpose.”).
- Children will be encouraged to use an alias, initials, or first name only for any activity that involves public posting, unless otherwise required by local regulation.
- For any digital activities where children 12 years old or under can interact with other users or share content they create with others, we will monitor and/or moderate these activities and content before posting.

KELLOGG COMPANY NUTRITION POLICY

We are committed to providing our consumers with a wide choice of quality food products that can be part of a balanced diet and meet their varying taste requirements.

1. Decades of nutrition science show that all foods have a place in the diet with balance and moderation, and that exercise, together with a balanced diet, is integral to a healthy lifestyle.
2. Fortification plays a positive role in the diet of consumers. Our products are fortified in keeping with the following considerations:
 - a. How they are used by the consumers
 - b. National laws and regulations
 - c. The nutrient intake and needs of the population
 - d. Technical feasibility
3. We believe that the enjoyment and appeal of our products are essential if they are to make a nutritional contribution to the diets of consumers.
4. We will keep abreast of the ongoing scientific advancements in nutrition and food research by:
 - a. Working collaboratively with health professional organizations and governments to develop public policies that will enhance the health of consumers.
 - b. Developing new products and enhancing existing products that take into account both current scientific advancements and the needs of consumers.
5. We will provide our consumers with nutrition information so that they can make informed food choices.



**“We are a company
of dedicated people
making quality
products for a
healthier world.”
W.K. Kellogg**