



Marketing to Children

Relates to: Fonterra Global Nutrition Policy

1. Purpose

This Fonterra Global Standard defines the minimum requirements that must be complied with by business units to ensure we are always honest about the nature and benefits of our products and use responsible practices for marketing and promotion of food and beverage products to children. This helps fulfil Fonterra's ambition to be leaders in sustainable dairy nutrition and provide goodness for generations.

This Fonterra Global Standard sets out the minimum nutrition criteria that products must meet in order to be marketed to children, along with definitions and requirements on the content of marketing targeted at children.

2. Scope

- 2.1 This Global Standard applies to all the entities and individuals outlined in the Scope section of the Fonterra Global Policy Principles and Framework.
- 2.2 This Fonterra Global Standard applies to marketing aimed at children only. It does not apply to marketing of products for children that is aimed at parents and caregivers.
- 2.3 Definitions of children, marketing to children and other terms that further describe the scope of this Fonterra Global Standard are included in section 7.

3. Requirements

3.1 Nutrition Criteria

3.1.1 Business units must ensure the following:

- a. No targeted marketing or advertising to children under 5 years old;
- b. Only products that meet the relevant Fonterra Nutrition Guidelines can be marketed to children aged 5 – 15 years old.
- c. Market responsibly for all age groups with consideration of their individual life stage needs.

3.2 Marketing Content

3.2.1 Business units must:

- a. Act responsibly when marketing products by being open and transparent to promote informed food choices for foods for children;
- b. Act responsibly when marketing foods to children by using portion control to help prevent over-consumption of products;
- c. Market foods in the context of a healthy lifestyle that includes a healthy eating plan and regular physical activity to encourage children to make healthy food choices, and ensure it's aligned with local, evidence-based dietary guidelines.
- d. Not undermine the role of parents or other responsible adults for guiding diet and lifestyle choices; and
- e. Not utilise marketing techniques that are designed to create a sense of urgency.

3.3 Dairy Nutrition Programmes

3.3.1 Fonterra is committed to making dairy nutrition accessible and provides free dairy nutrition to children in New Zealand through the KickStart Breakfast programme and through partnerships in other key markets. The promotion and marketing of these programmes must comply with this Fonterra Global Standard and be subject to the requirements of the Fonterra Global Donations and Sponsorship Standard.

3.4 Compliance with local regulatory requirements and local pledges

3.4.1 Aligned to the expectations of the Fonterra Global Legal and Compliance Policy, market-specific regulatory requirements that are more restrictive than this Global Standard must be met.

3.4.2 Business units may adopt a higher standard (for example, through signing onto a voluntary pledge with stricter nutrition criteria or marketing requirements) at the discretion of the relevant market senior leadership (e.g GM or Director) . However, no elements of voluntary pledges can undermine the requirements of this Fonterra Global Standard.

4. Accountability

4.1 Fonterra employees are accountable for ensuring the requirements specified in this Fonterra Global Standard are being met within Fonterra, and that contractors/consultants understand and comply with all aspects of this Fonterra Global Standard.

4.2 Business unit managers are accountable for ensuring employees are trained on, and comply with all aspects of this Fonterra Global Standard.

5. Compliance

5.1 The Fonterra Global Policy Principles and Framework details the expectations to comply with this Fonterra Global Standard.

6. Monitoring

6.1 Monitoring of this Fonterra Global Standard may be via mechanisms such as internal and external audits, Fonterra Global Regulatory Affairs and Fonterra Global Nutrition Council oversight, reporting and other internal controls.

7. Definitions

| Term | Definition |
|---|---|
| Children | Persons aged 15 years old or younger. In countries with specific guidelines for marketing to children, if the age dictated by the government is over 15 years old, the government definition prevails. If there is no government guidelines for marketing to children, then 15 years is retained as the cut off irrespective of the government’s definition of children. |
| Marketing to children | <ul style="list-style-type: none"> • Means advertising and communications targeted to children through television, social media, radio, print, cinema, podcasts, games, outdoor marketing and marketing of products in primary schools. It also covers advertising and communications on the internet, including third-party and company owned websites, apps, social media and interactive games. This standard does not apply to labels or packaging of products, public relations or in store point of sale material. • Marketing is considered targeted at children if it falls within one or both of the following categories: <ol style="list-style-type: none"> a. The content of the marketing (e.g. imagery, language, colour or music) is designed or could be considered to be designed to appeal to children aged 15 years and under; and/or b. The target market for the product includes children aged 15 and under and the marketing is appearing in media for which audience breakdown information is available (e.g. TV, cinema and radio) and more than 35% of the audience is made up of children aged 15 years old and under. • Marketing is considered targeted at children aged under 5 years old if the content (e.g. imagery, language) is clearly intended to target or appeal to children aged under 5 years. |
| “Meet relevant Fonterra Nutrition Guidelines” | Products positioned for nutrition and health need to meet Fonterra Nutrition Guidelines. |

8. Related Information

Fonterra Global Nutrition Standard

Fonterra Nutrition Guidelines

9. Approvals

This Global Standard is approved by the **Fonterra Global Nutrition Council**.