

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

Unilever is pleased to continue its participation in 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. Unilever supports CFBAI’s objectives and is committed to its Core Principles. Unilever is pleased to submit this restated pledge, which reflects CFBAI’s Core Principles, 8th ed. (2026).

I. Identifying Information

1. *Corporate Contact Information:*

Unilever United States
111 River Street
Hoboken, New Jersey 07030
www.UnileverUSA.com

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

Alaina Ingram, Esq.
Senior Counsel, Marketing
111 River Street
Hoboken, New Jersey 07030
Alaina.Ingram@unilever.com

Entities covered by the Pledge:

This pledge covers Unilever United States Foods brands sold in the U.S. (hereafter, Unilever’s “brands”).

Unilever commits that it will adhere to its pledge below as it applies to Unilever’s brands.

II. Core Principles

1. Advertising Primarily Directed to Children

For purposes of this pledge, “children” refers to persons under age 13. For television and other measurable media, this means marketing communications where children under age 13 represent at least 30% of the expected audience.

Unilever commits that all advertising primarily directed to children in covered media will be for foods that meet CFBAI’s Category-Specific Uniform Nutrition Criteria, 2nd ed. [or most recent edition].

2. Covered media

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

- Television
- Radio

- Print
- Digital media, including but not limited to the following media (and influencer content therein):
 - Company-owned websites
 - Third-party websites, including display, banner, pop-up, audio or video advertising¹
 - 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
 - Podcasts
 - Social Media²
 - Video sharing platforms (e.g., YouTube)
 - Gaming Platforms (e.g., Roblox)
 - Over-the-Top (OTT) streaming platforms (e.g., Netflix, Disney+)
- Video and computer games
- DVDs
- Word of mouth.³

3. Product Placements

Unilever commits to not paying for or actively seeking the placement of its food brands in third-party programming or editorial content of any medium primarily directed to children under age 13 to promote the sale of those products.⁴

4. Product Integrations

Unilever commits that it will not pay for or actively seek integration of its foods or beverages in any medium primarily directed to children under age 13, including in interactive games or other digital content, unless such foods or beverages meet CFBAI's Uniform Nutrition Criteria.

5. Influencers

¹ User-generated content that is not under the control of Unilever is not covered by the Core Commitments.

² 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.

³ Word-of-mouth advertising refers to advertising of a participant's food or beverage products that is primarily directed to children under age 13 by brand ambassadors, influencers, or other individuals with whom the participant has a material connection as the result of the participant providing payment, product samples, or other incentives (financial or otherwise) to such individuals in consideration for such individuals promoting the participant's branded food or beverages.

⁴ As covered in this pledge, 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."

In accordance with Unilever's own Principles, Unilever commits to not use influencers⁵ who primarily appeal to children, regardless of whether products meet nutrient criteria. Unilever also commits to not use influencers who are themselves under the age of 13.

6. Licensed Characters, Celebrities and Movie Tie-Ins

Unilever commits that its use of third-party licensed characters, celebrities (including athletes) and movie tie-ins in advertising primarily directed to children will be consistent with its advertising commitments set forth in above.

7. Advertising in Schools

Unilever commits to not advertising its brands or products to children in elementary and middle 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 and beverages that identify foods that are for sale; fundraising support; public service messaging⁶; curriculum materials; items given to school administrators for their personal use; charitable donations, or sponsorships.

III. Determining When Advertising Is Child-Directed Advertising

Unilever will use the following criteria to define advertising primarily directed to children under age 13 and to demonstrate compliance with CFBAI's Core Commitments. will consider advertising to be primarily directed to children when:

- (1) children ages 2-12 constitute 30% or more of the expected audience at the time the advertisement placement is purchased based on reliable third-party audience measurement data;

⁵ Unilever defines influencers as third-party endorsers such as celebrities, disruptors, social media stars, subject matter experts and editors/journalists. Unilever does not include licensed characters or brand-equity characters in its definition of influencers.

⁶ Unilever may participate in campaigns for education purposes. This commitment does not prohibit identification of corporate sponsorship to ensure transparency.

(2) targeting tools direct the digital advertisement to be served to users in a defined age demographic that includes ages 12 or younger or to content expressly designated or categorized as child-directed by the publisher or content creator;⁷ or

(3) Unilever lacks reliable third-party audience measurement data showing children to be less than 30% of the expected audience; (b) the advertiser cannot demonstrate that reliable age-gating or age-targeting tools were used such that individuals under age 13 were expressly excluded from the audience;⁸ and (c) the content in which the advertisement is placed appears to be primarily directed to children based on an evaluation of multiple factors relating to the content, including but not limited to the subject matter, visual content, language used, difficulty of game play, kind of music or audio content, influencers featured, actions taken to restrict children's access to the site or content, and entertainment ratings or content identifiers that may be used to label child-directed content.⁹

Digital media often provides advertisers with tools to direct or "serve" an advertisement only to users identified as having certain characteristics (e.g., age) or to place an advertisement only on digital content having certain characteristics (e.g., news site).¹⁰ In digital advertising, Unilever commits to use one or more of the following tools, where available and appropriate, to avoid serving advertisements for foods that do not meet CFBAI's Uniform Nutrition Criteria to children:

- (1) age-based targeting of only users identified as age 13 or older and excluding all individuals under age 13 or whose age is unknown;
- (2) interest-based or behavior-based targeting of only consumers identified as having an interest not primarily associated with individuals under age 13 or exhibiting online behavior that is not reasonably associated with individuals under age 13; and
- (3) exclusion lists of sites, channels, or content known to be or identified as child-directed and/or filters that exclude keywords and topics likely to be of primary appeal to children. Participants must be able to demonstrate their reasonable use of these digital advertising tools to the program administrator.

IV. ADVERTISING TO CHILDREN UNDER SIX YEARS OLD

⁷ For example, content designated on YouTube as "Made for Kids" or content categorized by a video streaming platform as children's programming.

⁸ Advertisements permitted to be served to users whose age is unknown would not be deemed to expressly exclude individuals under age 13.

⁹ This multi-factor analysis also applies in determining whether influencers or product integrations are child-directed when reliable audience data is unavailable or targeting tools have not been employed.

¹⁰ Information about a specific user, which may include a user's age, location, or interests, might be obtained directly from the user (such as when the user creates an account or profile) or inferred from the user's behavior or from information collected from the user's device. The Children's Online Privacy Protection Act prohibits the collection or use of personal information from children under age 13 without notice and parental consent.

Unilever commits to not engaging in advertising primarily directed to children under six.
Unilever has not done so since April 2006.