

Children's Food and Beverage Advertising Initiative
General Mills Pledge
July 11, 2007

General Mills is pleased to submit its Pledge to The Children's Food and Beverage Advertising Initiative (the CFBAI). The CFBAI is a voluntary self-regulation program currently comprised of eleven of the largest food and beverage companies in the United States. By advancing and hastening a shift in the mix of messaging to encourage healthier dietary choices and healthy lifestyles in advertising to children under 12, the CFBAI represents a significant step forward.

General Mills is proud to be a charter member of the CFBAI and is fully supportive of its goals. As an industry leader, General Mills is committed to maintaining the highest standards for responsible advertising to children. We have a long history of advocating increased levels of physical activity and support of fitness programs, particularly for children, in public policy arenas and through various private sector initiatives. Company initiatives, such as the General Mills Foundation's Champions for Healthy Kids program, reflect our decades of continuing support for youth nutrition and fitness initiatives of many kinds, further underscoring that commitment.

The scope and breadth of our Pledge to the CFBAI demonstrates General Mills' continuing commitment to high standards and to providing clear leadership on this important issue.

A. Identifying Information

1. *The corporate name and address of the Participant.*

Company Name & Address

General Mills Inc.
Number One General Mills Boulevard
Minneapolis, MN 55426
Phone: 763-764-7600
Fax: 763-540-4925
Web Site: <http://www.generalmills.com>

2. *The name and contact information of an individual(s) responsible for overall implementation of the Pledge.*

Pledge Implementation

Mark Addicks
Senior Vice President, Chief Marketing Officer
mark.addicks@genmills.com
763.764.7819

3. *The name of the specific entity or entities covered by the Pledge.*

General Mills Marketing, Inc.

4. *The name of each brand and/or product line that is covered by the Pledge.*

See Schedule A

B. Core Principles

1. *An overview of the manner by which the Participant intends to comply with the Advertising Messaging principle (i.e., the mix of product advertising including Healthy Dietary Choices and advertising including healthy lifestyles messages).*

- **General Mills will only advertise Healthy Dietary Choices to children under 12.**

General Mills will pledge to only advertise Healthy Dietary Choices to children under 12.

As discussed in detail in Sections 2(d) and 2(e), General Mills has developed a Healthy Dietary Choice standard based on the most current dietary recommendations and regulations from several federal agencies. The standard takes into account the calorie and overall nutrient or food group contribution of a food product. Because the Healthy Dietary Choice standard rests on key elements of nutrition, it will be applied consistently across all types of General Mills products.

- **General Mills will apply this guideline to 100% of products advertised in all media primarily directed to children under 12.**

A key principle of the CFBAI is that Participants devote at least 50% of television, radio, print and Internet advertising primarily directed to children under 12 to advertising that will further the goal of promoting Healthy Dietary Choices and/or healthy lifestyles. By the end of the pledge period, 100% of General Mills advertising in media primarily directed to children under 12 will be for products that:

- (1) represent Healthy Dietary Choices, and**
- (2) meet the sugar guideline described below.**

- **General Mills will not target any advertising to preschool children**, defined as children under six years of age, for any product, regardless of the product's nutritional profile.
- **General Mills will advertise to children under 12 only those products that have 12 grams or less of sugar per serving**

In recognition of consumer interest in the amount of sugar in food and beverage products and to support industry efforts to address consumer interest in sugar, advertising to children under 12 will also be subject to a sugar guideline. In addition to meeting the Healthy Dietary Choice standard, only those products that have 12 grams or less of sugar per serving, other than sugar from dairy, fruit and vegetables, will be advertised to children under 12.

- **General Mills advertising will continue to reinforce positive, healthy lifestyle choices.**

Because General Mills' Pledge is focused on Healthy Dietary Choices, we will not be relying on the healthy lifestyle messaging component of the program in meeting our Pledge commitments. However, General Mills fully intends to continue to build positive messages into its advertising to further the goals of the CFBAI and to continue to provide consumers with additional nutrition information about our products.

- **General Mills' Pledge encompasses the period of June 1, 2007 through December 31, 2008, covering approximately 89 million broadcast and print impressions annually.**

- **Balance, Moderation and Exercise**

It is our goal to help families and children address health and wellness issues by focusing on three steps to healthier living. We call this our Balance, Moderation, and Exercise strategy:

- **Balance:** encourage families/children to understand and follow nutritional guidelines for a balanced diet of healthy and nutritional foods.
- **Moderation:** encourage families/children to eat sensible portions of food at any one sitting and throughout the day—we will never depict or encourage over-consumption.
- **Exercise:** advocate higher levels of physical activity.

To achieve the above, and to help further the goals of the CFBAI, we will be undertaking the following initiatives:

Package Nutrition Information

To help consumers quickly see and understand nutrition information important to making informed food choices, General Mills will add Nutrition Highlights to the front of all Big G cereal boxes. The Nutrition Highlights will feature the amount and Daily Value of six items from the Nutrition Facts Panel: calories, saturated fat, sodium, and sugar, plus two other nutrients in the product. The packages will also include an explanation of the Nutrition Highlights and how they relate to the Nutrition Facts Panel on the side of the package. Packages with Nutrition Highlights will start to appear on store shelves in October 2007. All cereal brands will include Nutrition Highlights by the end of calendar 2008.

MightyGiants:

MightyGiants is a General Mills initiative designed to make health education fun and entertaining for children under 12 by engaging them in 15 second animated spots on Nickelodeon television and Web sites. The spots do not feature any products, and direct kids to an interactive Web site supporting our Balance, Moderation and Exercise strategy. The spots feature the Sprout character, who will deliver messages directly to kids about nutrition and exercise.



Green Giant Nickelodeon Vegetables:

General Mills has partnered with Nickelodeon to bring the popular Nickelodeon characters SpongeBob SquarePants, Dora the Explorer and Diego to frozen and canned vegetables. The goal is to make eating vegetables fun for kids. Each package of frozen vegetables will also include stickers featuring the characters that parents can use to reward children for eating their vegetables. The products will ship in July 2007, with sales of over three million packages expected in the first year.



In addition, General Mills will continue its long-standing history of charitable activities that further emphasize healthy lifestyle choices for children. Specifically, the General Mills foundation will fund initiatives such as those granted in 2007:

Champions for Healthy Kids: A grant program in partnership with the American Dietetic Association that annually awards 50 grants of \$10,000 each to grassroots organizations around the country supporting innovative youth nutrition and fitness programs.

Presidential Active Lifestyle Awards (PALA): A partnership with the President's Council on Physical Fitness and Sports in which General Mills has sponsored hundreds of thousands of children to earn their PALA. Children are required to exercise for at least one hour every day, five days a week for six weeks to earn the PALA.

2. A description of how the Participant intends to comply with the percentage requirement of the Advertising Message principle, including the following information:

- a. *state separately for each covered medium (television, radio, print and Internet) the percentage of advertising (measured in media impressions) that the Participant intends to devote to healthy lifestyles messaging and the percentage of advertising that the Participant intends to devote to advertising products representing Healthy Dietary Choices;*

This pledge is for the period June 1, 2007 through December 31, 2008. By the end of this period, 100% of all advertising in all media primarily directed to children under 12 will be for products that (1) represent Healthy Dietary Choices as described in Section 2(d) of this Pledge *and* (2) meet the sugar guideline described above in Section B(1). We intend to implement this Pledge as soon as possible, with approximately 90% of television, 100% of print, 100% of radio and 99% of Internet advertising to children under 12 meeting the above standards during and throughout the *entire* period, and with fully 100% percent of such advertising meeting the Pledge by the end of the pledge period.

- b. *the proposed method by which the Participant intends to calculate media impressions for television, radio, print and Internet (excluding company owned websites) necessary to satisfy the percentage requirement;*

Measurement and Calculations

For all media, we will follow a key benchmark historically used by the Children's Advertising Review Unit (CARU): Any program where 35% or more of the total viewing audience is under 12 years of age will be considered "children's advertising."

Audience demographic calculations will be measured in media impressions primarily directed to specific demographic groups at the time the advertising is purchased, as determined by AC Nielsen ratings for TV and Internet, SRI Research (SRI) for radio, and Simmons and MRI (Mediamark Research Inc.) data for print. Our commitment will be calculated separately for each advertising medium.

We monitor ratings and audience demographics on a regular basis as available to ensure that we are aware of any changes in programming and/or audience composition. Our media buying agencies are aware of our CFBAI Pledge and will adjust media buys on an on-going basis to ensure compliance with the Pledge.

Summary Table: External Advertising

Medium	Audience Composition	Measurement of Audience Composition	Criteria for Brands Permitted to Advertise
Television	35% or greater is under 12	AC Nielsen Ages 2-5, 6-11 Issued Monthly	Meet Healthy Dietary Choice standard and sugar guideline
	50% or greater is under 6	AC Nielsen Ages 2-5 Issued Monthly	Not Allowed
Print	35% or greater is under 12	Simmons and/or MRI Ages 6-11 Issued Twice per Year	Meet Healthy Dietary Choice standard and sugar guideline
Radio	35% or greater is under 12	SRI Research Ages 6-11 Issued Twice Per Year	Meet Healthy Dietary Choice standard and sugar guideline
Internet	35% or greater is under 12	AC Nielsen Ages 6-11 Issued Monthly	Meet Healthy Dietary Choice standard and sugar guideline
	50% or greater is under 6	AC Nielsen Ages 2-11 plus content subject matter to estimate Issued Monthly	Not Allowed

- c. *the proposed method by which the Participant intends to measure advertising on Participant owned websites;*

Measurement and Calculations

It is difficult to measure audience composition on the Internet without implementing complex tracking mechanisms. For this reason, if the content of one of our own sites is targeted to children under 12, we will assume that 100% of the traffic is coming from children under 12.

Only products that represent Healthy Dietary Choices *and* meet the sugar guideline will be allowed to appear on an internet site with content primarily directed to children under 12. Content primarily directed to children under 12 will be determined based on a number of factors, including the content’s subject matter, format, projected audience demographics and the composition of audience to which the site is advertised.

Additionally, General Mills will continue to operate in full compliance with the Children’s Online Privacy Protection Act’s (COPPA) requirements for securing parental consent prior to collecting any personally identifiable information from children.

See Schedule B for a list of all General Mills U.S. sites with content primarily directed to children under 12.

Summary Table: Internal Websites

Product meets Healthy Dietary Choice standard and sugar guideline	Content Audience	Permitted on an Internal Site with Content Primarily directed to Children Under 12
Yes	Under 6	Not Allowed
Yes	Under 12	Allowed
No	Under 6	Not Allowed
No	Under 12	Not Allowed

- d. *for products representing Healthy Dietary Choices, state the scientific and/or governmental standard(s), or the company developed standard(s) on which the Participant is relying to designate the product as a Healthy Dietary Choice; and*

To be advertised to children under 12, a product must:

(A) Contain 175 calories or less per labeled serving **AND** it must **ALSO**

Either

(B) Meet the FDA definition of “healthy” per labeled serving

OR

(C) Supply, per labeled serving, at least ½ serving of a food group targeted by the DHHS/USDA 2005 Dietary Guidelines for Americans¹ for increased consumption (i.e., whole grain, fruit, vegetables or fat-free or low fat dairy), **AND** have:

- ≤230 milligrams of sodium for cereal and snacks or 480 milligrams for side and main dishes
- ≤ 2 grams of saturated fat
- 0 grams of labeled trans fat

- e. *to the extent the Participant is relying on a company developed standard, state the scientific and/or governmental standard(s) on which it is based.*

The standards outlined in Section 2(d) were developed by nutrition experts from the General Mills Bell Institute of Health and Nutrition and are based upon the most current federal dietary recommendations and regulations from several federal agencies². These nutrition standards consider calorie AND overall nutrient or food group contribution of a food product. They address calorie requirements of children, incorporate the FDA’s definition of a healthy product and target key food groups recommended for increased consumption.

Specifically, the basis for each part of the requirement is as follows:

A: 175 Calories or less per labeled serving

A criterion for calorie content is included in recognition of the increasing prevalence of and concern about obesity, particularly childhood obesity. Balancing energy intake and energy output is essential for managing weight. According to the DHHS/USDA 2005 Dietary Guidelines for Americans and recommendations from the Institute of Medicine, most children ages 6-12 require

¹ About the Dietary Guidelines: The *Dietary Guidelines for Americans* has been published jointly every 5 years since 1980 by the Department of Health and Human Services (DHHS) and the Department of Agriculture (USDA). The *Guidelines* provide authoritative advice for people two years and older about how good dietary habits can promote health and reduce risk for major chronic diseases. They serve as the basis for federal food and nutrition policy and feeding programs such as school meals. *Dietary Guidelines for Americans*, 2005 was released January 12, 2005, by DHHS Secretary Tommy G. Thompson and USDA Secretary Ann M. Veneman. Please visit www.health.gov/dietaryguidelines/ for more information on the 2005 Guidelines.

² U.S. Department of Health and Human Services and U.S. Department of Agriculture. *Dietary Guidelines for Americans*, 2005. 6th Edition, Washington DC: U.S. Government Printing Office, January 2005 (www.health.gov/dietaryguidelines/); Otten, J., Pitzel Hellwig J. & Meyers, L. (Eds.), (2006). *The Dietary Reference Intakes: The Essential Guide to Nutrient Requirements*. Washington DC: The National Academies Press; 21 CFR Parts 100-169, 2006.

approximately 1800 calories daily to maintain energy balance³. This same level of calories is used as the basis for the USDA MyPyramid recommendations for children⁴. FDA regulations identify 10% of a recommended intake as a "good source" or significant amount⁵. This approach characterizes 180 calories a significant source for children (1800 calories x 10% = 180 calories). In establishing our calorie criterion, we also considered the calorie level used in school wellness standards. For example, California's SB12 includes a calorie content criterion of 175 calories for individual foods served a la carte to elementary school children⁶. Based on these considerations, we selected the more conservative, lower value of 175 calories as our criterion.

B: FDA definition of healthy per labeled serving

The FDA has established a regulatory definition of healthy⁷ as a product containing:

- 3g or less of total fat,
- 1g or less of saturated fat and ≤ 15% of calories from saturated fat,
- 480mg or less of sodium,
- 60mg or less of cholesterol
- At least 10% Daily Value of one of the following: vitamin A, vitamin C, calcium, iron, protein or fiber.

C: Supply, per labeled serving, at least ½ serving of a food group targeted by the DHHS/USDA 2005 Dietary Guidelines for Americans for increased consumption AND have:

- ≤230 milligrams of sodium for cereal and snacks or 480 milligrams for side and main dishes
- ≤ 2 grams of saturated fat
- 0 grams labeled trans fat

The DHHS/USDA 2005 Dietary Guidelines for Americans specifically encourage increased consumption of four food groups: whole grains, fruits, vegetables and fat-free or low-fat dairy⁸. Our nutrition standards reinforce these recommendations by including a criterion for at least ½ serving contribution of one of these food groups. A half-serving of a food group can make a significant contribution toward reaching the total daily amount required within the four food groups.

³ Estimated daily calorie requirements for children 6-12 years range from 1200-2600 calories. A value of 1800 calories is a "mid-point." *DHHS/USDA 2005 Dietary Guidelines*, page 12.

⁴ The USDA MyPyramid, released April 2005, which replaces the Food Guide Pyramid introduced in 1992, was developed to carry messages of the *DHHS/USDA 2005 Dietary Guidelines* and to make Americans aware of health benefits of improvements in nutrition, physical activity and lifestyle behavior. MyPyramid symbol represents the recommended proportions of foods from each food group and focuses on the importance of making smart food choices in every food group everyday. In September 2005, the USDA released the child-friendly version of MyPyramid for children 6-11 years old, called MyPyramid for Kids. An 1800-calorie level is used for specific food group recommendations (# of servings/day) and in the educational tools related to energy balance (www.mypyramid.gov).

⁵ "Good source nutrient content claim" 21 CFR 101.54(c). 2006 ed., 93-94.

⁶ An act to amend Sections 49430, 49431, 49433.9, and 49434 of, and to add Section 49431.2 to, the Education Code, relating to pupils. SB.12 (2005).

⁷ FDA "Healthy" is defined per reference amount, per labeled serving and per 50g for products with a reference amount ≤30g. Our nutrition standards apply these criteria on a labeled serving basis to reflect the serving size actually shown on the product package. "Healthy nutrient content claim" 21 CFR 101.65(d)(2). 2006 ed., 113-114;

⁸ The *DHHS/USDA Dietary Guidelines for Americans* state, "Increased intakes of fruits, vegetables, whole grains, and fat-free or low-fat milk and milk products are likely to have important health benefits for most Americans." *DHHS/USDA 2005 Dietary Guidelines*, pages 23-28.



Based on the Dietary Guidelines, a ½ serving is equivalent to:

- 8 g of whole grains⁹
- 1/4 cup of fruit
- 1/4 cup of vegetables
- ½ cup of fat-free or low-fat dairy

Although the Dietary Guidelines encourage the increased consumption of the above four foods, the Dietary Guidelines also recommend limiting intakes of sodium, saturated fat and trans fat. For this reason, products that provide a half-serving of a food recommended for increased consumption must also not exceed certain sodium, saturated fat and trans fat limits.

For sodium, the limitation was established using the Dietary Guidelines and the FDA's requirement for "healthy" as benchmarks. For cereal and snacks, we started with the Dietary Guidelines recommendation of consuming no more than 2,300mg of sodium per day¹⁰ and applied the FDA measurement of 10% of the recommend intake as a "good source" or significant amount (2,300mg x 10% = 230mg)¹¹. The limitation of ≤480mg of sodium for side and main dishes is consistent with the FDA's sodium level requirements to meet the definition of healthy for a single food, and is more restrictive than the FDA's sodium limit for main dishes¹².

Limitations of less than 2g of saturated fat and 0g of trans fat were established based upon the Dietary Guidelines recommendations to consume less than 10 percent of calories from saturated fat and to keep trans fat consumption as low as possible¹³. Using our calorie limit of 175 calories or less per serving, this equals 2g of saturated fat (175 calories x 10%)/9 calories per g of fat = 2g) and 0 labeled grams of trans fat.

⁹Six servings of grain are recommended for most adults by the *USDA 2005 Dietary Guidelines*, of which three should be whole grain. USDA defines a "grain serving" as at least 16g of flour. Accordingly, a serving of whole grain would contain at least 16g of whole grain and three servings would provide at least 48g of whole grain (16g x 3 servings = 48g).

¹⁰ The *DHHS/USDA Dietary Guidelines for Americans* state, "Consume less than 2,300mg (approximately 1 tsp of salt) of sodium per day." *DHHS/USDA 2005 Dietary Guidelines*, pages 39-42.

¹¹ "Good source nutrient content claim" 21 CFR 101.54(c).

¹² FDA's definition of "healthy" includes 480mg or less of sodium per labeled serving for a single food. 21 CFR 101.65(d)(2)(ii). FDA's definition of healthy for main dishes includes 600mg or less of sodium per labeled serving. 21 CFR 101.65(d)(2)(ii).

¹³ The *DHHS/USDA Dietary Guidelines for Americans* state, "Consume less than 10 percent of calories from saturated fatty acids and less than 300mg/day of cholesterol, and keep *trans* fatty acid consumption as low as possible." *DHHS/USDA 2005 Dietary Guidelines*, pages 29-34.



3. *The manner by which the Participant intends to implement the Licensed Character principle, including the following:*

- a. *the percentage reduction in the use of Licensed Characters in advertising that does not include healthy lifestyles/Healthy Dietary Choices messaging; and*

As part of the CFBAI Pledge, companies commit to reduce their use of third-party licensed characters in advertising primarily directed to children under 12, unless the advertising includes a product meeting Healthy Dietary Choices or includes healthy lifestyle messaging designed to appeal to the intended audience.

General Mills hereby pledges that only products that (1) represent Healthy Dietary Choices as described in Section 2(d) of this Pledge *and* (2) meet the sugar guideline described above in Section B(1) will be allowed to use third-party licensed characters in advertising to children under 12.

Consequently, no licensed characters will be used in advertising primarily directed to children under 12 for products not meeting these standards.

- b. *the proposed basis for calculating such reduction, including a baseline figure from Participant's use in FY 2006 of Licensed Characters in advertising, and a description of how the baseline figure was calculated.*

See above. Advertising using third-party licensed characters on products that do not meet the Healthy Dietary Choice guidelines and sugar guideline will be eliminated under this Pledge.

4. *A description of the manner by which the Participant intends to implement the Product Placement principle.*

General Mills hereby pledges that we will not pay for or actively seek to place any of our products, regardless of nutrition profile, into program/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products.

5. *A description of the manner by which the Participant intends to implement the Interactive Games principle.*

General Mills hereby pledges that only products that (1) represent Healthy Dietary Choices as described in Section 2(d) of this Pledge *and* (2) meet the sugar guideline described above in Section B(1) will be incorporated into interactive games primarily directed to children under 12.

In addition, General Mills websites and interactive games primarily directed to children under 12 will include a 30-minute "activity break," pausing the activity to encourage children to engage in another "more active" activity. Links to external health-oriented sites that meet CARU guidelines (e.g., presidentschallenge.org, mypyramid.gov, kidnetic.com) will be provided where feasible. Games will reinforce the Balance, Moderation and Exercise strategy outlined in Section B1, and will never advocate, encourage or depict excessive consumption of food products.

6. *A description of the manner by which the Participant intends to implement the Advertising in Schools principle.*

General Mills does not advertise in elementary schools. General Mills pledges that we will continue our policy to not advertise food or beverage products of any kind, regardless of nutrition profile, in elementary schools. Similarly, we will not conduct giveaways, product promotions, contests or any other advertising activity primarily directed to students in elementary schools.

The General Mills Box Tops for Education (BTFE) program does operate in K-8 schools, though it is specifically and primarily directed to parents and gatekeepers. In aggregate, 90,000 schools have earned over \$200 million by redeeming Box Tops coupons from products and services families already buy through the Box Tops school fundraising program. Approximately 40% of the redemptions come from non-food items, such as tissues, paper towels and food storage bags. In total, Box Tops coupons are offered on 190 different products.

The CFBAI does not limit charitable fundraising activities. Nevertheless, the BTFE program pledges it will continue to not market or advocate the purchase of individual brands or products in elementary schools. BTFE will continue to operate collection and other program elements through adult volunteers who coordinate the collection of Box Tops. Schools may also continue to have Box Tops collection boxes on location; however, the collection boxes that School Coordinators can order from BTFE will not contain product messages or product brand images.

7. *An implementation schedule for each commitment set forth in the Participant's Pledge.*

All commitments set forth in this Pledge will be effective as soon as possible.

We will only advertise products that (1) represent Healthy Dietary Choices as described in Section 2(d) of this Pledge *and* (2) meet the sugar guideline described above in Section B(1). We will NOT advertise any product to children under 6.

Schedule D includes all products that General Mills currently intends to advertise in media primarily directed to children under 12 during the period of this Pledge. Numerous products that do not meet the standards will immediately cease advertising and therefore are not included on the schedule. As a result, approximately 90% of television, 100% of print, 100% of radio, and 99% of Internet advertising to children under 12 meet the above standards during and throughout the *entire* period of this Pledge. We will commit to achieve 100% fulfillment of this Pledge on and across all media by 12/31/08.

Our CFBAI Pledge will be reflected in the Company's Marketing Guidelines, and will be enforced across the company through a strict internal review and approval process.

All advertising to children, whether it is TV, radio, print or Internet will go through a rigorous review process, including prescreens by CARU and final approvals by General Mills Marketing and Advertising senior management. Every marketer at General Mills will be required to review and acknowledge their understanding of General Mills' Marketing Guidelines annually. Each of our design, advertising and web agencies will be required to do the same. In this way, we will ensure that the way in which we advertise our products will comply with our CFBAI Pledge.

C. Supporting Data

1. For each product that the Participant intends to comply with the Healthy Dietary Choices portion of the Pledge:

Schedules C & D contain information on *only* those products that the company intends to advertise to children under 12 during the period covered by this Pledge.

- a. *the product's name*; See Schedule C
 - b. *the product's nutritional labeling*; See Schedule C
 - c. *the product's ingredient list*; See Schedule C
 - d. *the established scientific, governmental and/or company developed standard relied on; and*

See Schedule D
 - e. *the basis for concluding that the product meets the standard.* See Schedule D
2. For each healthy lifestyle messaging option that the Participant intends to comply with the messaging portion of the Pledge:
 - a. *the messages the Participant intends to use (or a description of a source, for example, the Ad Council's "Small Step" Childhood Obesity Prevention campaign);*
 - b. *a representative sample of the messages; and*
 - c. *if the messages are to be joined with product advertising, a representative sample of product advertising including the messaging, when available.*

Because General Mills' Pledge is focused on Healthy Dietary Choices, we will not be relying on the healthy lifestyle-messaging component of the program in meeting our Pledge commitments. However, General Mills fully intends to continue to build positive messages into its advertising to further the goals of the CFBAI and to continue to provide consumers with additional nutrition information about our products.

3. For those Participants that do not intend to advertise to children under 12:

- a. *a description of the specific criteria the Participant will use for each covered medium (television, radio, print and Internet) to determine if advertising is primarily directed to children under 12; and*

Not Applicable

- b. *a media plan indicating the venues of the Participant's advertising on each covered medium and providing sufficient detail to determine whether the media is primarily directed to children under 12 in accordance with the criteria established under section 3(a) above.*

Not Applicable