

Children's Food and Beverage Advertising Initiative Mars Pledge Outline

Covered Entities

Mars Snackfoods US, LLC and GOAT Food and Beverage Company (collectively "Mars")
800 High Street
Hackettstown, NJ 07840

Individual Responsible for Overall Implementation

Todd R. Lachman, President, Mars Snackfoods US, LLC

Product Line(s) Covered by Pledge

Snack food and confectionery products

Core Principles

Mars is proud of its products, which have brought enjoyment and pleasure to consumers of all ages for many years. Mars, as a responsible and family-friendly marketer, supports the Children's Food and Beverage Advertising Initiative (CFBAI). Confectionery and snack foods are treats that can be enjoyed by the whole family, but should be consumed only in moderation as part of an overall balanced and healthy diet and active lifestyle. We will continue to advertise our traditional confectionery and snack food products and brands in venues suitable for families, and respect the important role of parents as gatekeepers of the products that children under 12 consume.

Our intent is to focus our marketing communications for our traditional candy and snack food products to those over 12. We have ceased all advertising in third party venues primarily directed to children under 12. Company websites featuring traditional confectionery and snack products have always been intended primarily for those over 12, but we have eliminated several online games developed for kids under 12 at Company websites featuring traditional confectionery or snack food products. Mars will also voluntarily include healthy lifestyle messaging in addition to nutrition information at its traditional confectionery and snack websites.

Mars is hard at work developing new products that will provide nutritional benefits to consumers. Media plans for our "Better for You" products are still being formulated, and we will update the CFBAI as plans evolve. Reflecting our commitment to respect the important role of parents, marketing communications for our "Better for You" products that include the child audience, if any, will be aimed at children 9 and older after September 30, 2007, as well as to adults and teens.

Mars is pleased to work with the CFBAI in promoting responsible self-regulation of food advertising. Mars associates, as well as its advertising, marketing, media buying and other agencies, have been instructed to comply with these policies.

Our Standards for “Better for You” Foods

The CFBAI pledge program is designed to further the goal of promoting healthy dietary lifestyles and choices for children within the framework of each participating company’s product portfolio. Our “Better For You” snack products will meet the following criteria:

Per serving the product will contain no more than 150 calories (which is approximately 10 % of total calories for a sedentary individual in the 9 – 12 year old age group), less than or equal to 2 grams of cholesterol-raising fat/ SFA minus stearic acid, no more than 0.5 grams trans fat per serving and no more than 35% sugar, **AND** meet one or more of the following nutritional criteria:

- ½ serving of vegetable, fruit, whole grain or low fat dairy, **OR**
- A 25% reduction in total fat, sodium or sugar (consistent with what is required for a "Reduced" claim according to FDA regulations), **OR**
- An excellent source (20% DV) of a nutrient shortfall of one or more nutrients for which the identified child population ages 9 – 12 is deficient (*e.g.*, Vitamins E, K, Mg, Ca, Fiber).

Contributing to servings of fruit, vegetable or whole grain as well as reducing the amount of fat, sugar, sodium and trans fats in the diet are all consistent with the 2005 U.S. Dietary Guidelines.¹ In addition, the specific nutrients chosen for possible fortification are consistent with the nutritional shortfalls of children as identified by expert panels convened by the Food and Nutrition Board of the Institute of Medicine (IOM). In developing our Company standard, we relied on our internal nutrition and health experts and consulted with independent nutrition experts.

Use of Licensed Characters

Mars will not use third party Licensed Characters in advertising primarily directed to children under 12.

Product Placement

Mars will not seek or authorize paid product placements in television, films or other media primarily intended for children under 12.

¹ <http://www.health.gov/dietaryguidelines/dga2005/recommendations.htm>.

Interactive Games

Company websites featuring our traditional confectionery and snack food products have always been primarily directed to adults and teens, not to children under 12. Any interactive game originally developed or designed for children under 12 featuring confectionery or snackfood products that do not meet our nutrition criteria has been eliminated from Company websites. The Company will also voluntarily include product nutrition information and healthy lifestyle messages in appropriate locations at our sites by September 30, 2007.

Elementary School Advertising

Mars will not advertise products in elementary schools.

Implementation Schedule

March 31, 2007: Advertising for traditional candy and snack food products in television, radio, print, Internet and other third-party media primarily designed for children under 12 ceased.

June 30, 2007: Interactive games originally developed or designed for children under 12 were removed from all Company websites featuring our traditional snack and confectionery products.

September 30, 2007: Healthy lifestyle messages and nutrition information will be added to all Company snack and confectionery websites. Reflecting our commitment to respect the important role of parents, marketing communications for our “Better for You” products that include the child audience, if any, will be aimed at children 9 and older after September 30, 2007, as well as to adults and teens.

Products Meeting Mars “Better for You” Standards

See Appendix C1 for product names, nutrition labels and ingredient lists for our “Better for You” products. The nutrition label substantiates that each of these products meets our Company standard.

Criteria We Apply to Determine that Advertising is Directed to Children 12 and Older

3rd Party media and websites: Mars Snackfoods US, LLC will not purchase advertising time or space in television, radio, print and Internet venues primarily directed to children for traditional confectionery and snackfood products. (GOAT Food and Beverage Company produces only products that meet our “Better for You” criteria.) This includes child-directed content, such as television programming during kids-block times or other television programs primarily directed to children under 12, and print publications (like

National Geographic Kids, etc.) or Internet sites whose content is principally aimed at children under 12.²

Our own Websites: Our traditional snack food and confectionery websites are primarily directed to adults and teens, not children. (Adult women is the fastest growing category of gamers.) A few interactive games on Mars Snackfoods US, LLC websites featuring traditional confectionery and snackfood products initially developed for kids under 12 have been eliminated. One existing website featuring our KidDidits™ Brand of “Better for You” snacks includes some content developed for kids 6-12. Reflecting our commitment to respect the important role of parents, marketing communications for our “Better for You” products that include the child audience, if any, will be aimed at children 9 and older after September 30, 2007, as well as to adults and teens.

The Company’s associates, advertising and promotional agencies and media buying agencies have been instructed to comply with this pledge commitment.

² For purposes of this commitment, the Company will not purchase time or space in television, radio, print or Internet venues where the composition of the under-12 audience at the time the media is purchased is estimated to exceed 25% of the total audience. This standard will apply to the expected audience over the entire season in which a television program is aired, understanding that audience demographics can vary from week to week from estimates at the time the media is purchased.

APPENDIX C.1.

“Better for You” Foods

The following Mars Snackfoods US, LLC and GOAT Food and Beverage Company products currently comply with the Mars nutrition guidelines established in its CFBAI Food Pledge:

KidDidits™ Snacks:

- Really Cheesy Crackers
- Little Dippers™
- Mini Vanilla Cookies
- Mini Chocolate Cookies
- Pretzel Launchers™
- Chocolate Vanilla Sundae Bars

Generation Max™ Snacks:

- 3 Musketeers® Chocolate Brownie Bar
- 3 Musketeers® Chocolate Strawberry Brownie Bar
- 3 Musketeers® S'Mores Brownie Bar
- Snickers® Clusters
- Twix® Clusters
- Combos® Pizza Crackers
- Combos® Hot & Spicy Crackers
- Combos® Ranch Pretzels
- M&M'S® Cookies
- Snickers® Cookies

G.O.A.T.™ Foods:

- Rumble™ Apple Punched
- Rumble™ Who's the Mango?
- Rumble™ Fruit Fight
- Shuffle™ Big Bad BBQ
- Shuffle™ Hot Picnic Chik!
- Shuffle™ Thrill-a Dill-a
- Shuffle™ Slammin' Salsa
- Jabs™ Holy Guacamole
- Jabs™ Thrill-a Dill-a