



Children's Food and Beverage Advertising Initiative:
Pledge Outline

Introduction

Unilever is pleased to participate in the Children's Food and Beverage Advertising Initiative. Unilever's mission is to add vitality to life, and we have therefore carefully considered our approach to the issue of health and nutrition -- particularly with regard to children. Unilever's Pledge is consistent with its responsible approach to advertising directed to children. As explained in more detail below, Unilever does not advertise to children who are younger than six (6) years of age, and will only advertise to children between the ages of 6 through 11 those food and beverage products that qualify for our "Eat Smart/Drink Smart" Logo program. Foods that qualify for the logo are based on nutritional guidelines established by international public health authorities, including the U.S. Dietary Guidelines.

As a leader in the global food market, Unilever is committed to market great-tasting foods and make better-for-you options easier to find. Eating well should be easy. Nevertheless, it can be confusing to know exactly what foods and drinks represent better-for-you options. That's where the Eat Smart™ and Drink Smart™ Logos come in -- to help give consumers - parents and children alike - information to make smarter food and drink selections. Consumers can find these Logos on the front of packs of all our foods and drinks that meet specific Unilever criteria which are based on U.S. Dietary Guidelines (set forth in more detail below).

A. Identifying Information

1. The corporate name and address of the Participant.

Conopco, Inc. d/b/a Unilever
700 Sylvan Ave.
Englewood Cliffs, NJ 07632

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

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700 Sylvan Ave.
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3. The name of the specific entity or entities covered by the Pledge.

Conopco, Inc. d/b/a Unilever (hereinafter, "Unilever United States")

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

**Skippy®
Popsicle®**

We interpret "covered by the Pledge" to mean products that are marketed to children under 12. As of the date hereof, Unilever United States markets only the above brands to children under 12; however, we will update this response as necessary in the event that we expand our marketing to children under 12 beyond the above brands in the future.

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).

Unilever United States will no longer direct any advertising materials (other than labeling and the following point of sale materials: (i) materials affixed to and/or holding product; and (ii) those containing basic product descriptions (collectively, the "Excepted Materials")) to children between the ages of 6 through 11, except for advertising materials featuring products that meet the criteria for our "Choices"/"Eat Smart-Drink Smart" logo¹ (the "Logo") as set forth in that program.

This exceeds the Advertising Message principle commitment because we are ensuring that 100%--rather than just 50%--of our advertising to children ages 6 through 11 will comply with the "healthy dietary choice" option.

Note that other than via Excepted Materials, Unilever United States does not direct advertising to children under the age of 6, and has not done so since April 2006.

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

¹ NOTE: Unilever United States is in the process of placing Logos on the packaging of products which qualify for them; there are currently products in the portfolio (including most Popsicle® brand products) that qualify for the Logo, but do not yet bear it.

- 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;

For each covered medium (TV, radio, print and Internet, hereinafter, the “Covered Media”), Unilever United States will devote 100% of its advertising directed to children ages 6 through 11 to products that qualify for a Logo.

- 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;²
N/A.

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

For websites that it owns, Unilever United States will devote 100% of its advertising directed to children ages 6-11 to products that qualify for a Logo.

- 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

Products representing “healthy dietary choices” will be those meeting the nutrient profile criteria for Unilever’s Eat Smart/Drink Smart Logo program. The goal of the program is to help consumers achieve goals of dietary guidelines by limiting their intake of Trans Fats, Saturated Fats, Sodium, Sugars and Cholesterol. Under the Logo program, products are compared against nutritional benchmarks for these 5 key nutrients. Levels for these benchmarks are derived from a calorie-based translation of international and a range of national dietary guidelines, and were developed in consultation with nutritionists. <http://www.unilever.com/ourvalues/nutritionhygienepersonalcare/nutrition/choices/benchmarks.asp> and clicking on the PDF “Unilever Nutrition Enhancement Programme – based on International Dietary Guidelines” under the Tab “Related Links.”

² Such calculations must be measured in media impressions at the time the advertising is purchased, as determined by reliable third party data such as Nielsen ratings for TV, radio and Internet, and PIB (Publisher’s Information Bureau) and MRI (Mediamark Research Inc.) data for print advertising. The 50% commitment should be calculated separately for each advertising medium.

The basis for this program is described in the publication, “A method to improve the nutritional quality of foods and beverages based on dietary recommendations.” European Journal of Clinical Nutrition, November 22, 2006.

- 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.

U.S Dietary Guidelines and International Dietary Guidelines form the basis for the Unilever Eat Smart/Drink Smart Program. The WHO/FAO global strategy (World Health Organization (2004), Global strategy on diet, physical activity and health, Fifty-seventh World Health Assembly) and U.S. Dietary Guidelines have recommended limiting the intake of saturated fat, trans fat, sodium and sugar for the benefit of public health.

- 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

Unilever United States will only use 3rd party licensed characters of particular appeal to children under 12 (“Licensed Characters”) to advertise Logo qualifying food or beverage products in the Covered Media to children ages 6 through 11.

- 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.

N/A.

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

Unilever United States does not and will not pay for or actively seek to place any of its food or beverage products in program/editorial content featured in any Covered Medium primarily directed to children under 12, which content is created by a third party, for the purpose of promoting the sale of such products (“Product Placement”). For avoidance of doubt, as used herein, the term “Product Placement” does not include, for example, the placement of Logo-qualifying products in advertising,

program/editorial content, entertainment and/or branded entertainment created by or on behalf of Unilever United States.

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

Unilever United States will use only Logo-qualifying products in any interactive game that is primarily directed to children ages 6 through 11.

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

Currently, Unilever United States only advertises in elementary schools via its Skippy® brand. The brand currently places in elementary schools a small amount of print advertising directed to children aged 6 and older, which such advertising features only Logo-eligible products. Although this advertising only features products representing healthy dietary choices, in accordance with this Pledge, Unilever United States will cease such activities by October 15, 2007, after which time the company will no longer advertise food or beverage products in elementary schools. For avoidance of doubt, Unilever United States' commitment to not advertise food or beverage products in elementary schools will not include/will not apply to branded or unbranded displays of food and beverage products, charitable fundraising activities, public service messaging, or advertising directed to school administrators.

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

Advertising Messaging Principle: Other than via the Internet and the Excepted Materials, Unilever United States, as of the date hereof, only advertises Logo-qualifying products to children ages 6 through 11. Unilever United States will be revising its Internet advertising in the coming months so that the company will no longer advertise non-Logo qualifying food and beverage products to children ages 6 through 11 (other than via the Excepted Materials) by October 15, 2007.

Licensed Character Principle: As of the date hereof, the only vehicles by which Unilever United States uses Licensed Characters to advertise non-Logo qualifying products are the Internet and the Excepted Materials. Unilever will remove Licensed Characters from Internet advertising featuring non-Logo qualifying products by October 15, 2007.

Interactive Games Principle: Unilever United States will use only Logo-qualifying products in interactive games primarily directed to children ages 6 through 11 by October 15, 2007.

Product Placement Principle: See no. B(4) above. Already implemented.

Advertising in Schools Principle: In accordance with no. B(6) above, Unilever United States will no longer advertise food or beverage products in elementary schools as of October 15, 2007.

C. Supporting Data

1. For each product that the Participant intends to comply with the healthy dietary choices portion of the Pledge:

a. the product's name;

(i) **Popsicle® brand products - See Appendix A.**

(ii) **Skippy® brand products – See Appendix B.**

b. the product's nutritional labeling;

See Appendices A and B

c. the product's ingredient list; and

See Appendices A and B

e. the basis for concluding that the product meets the established scientific, governmental and/or company developed standard relied on.

Each product complying with the Pledge (i) meets the benchmarks set forth below for saturated fat, trans fat, sodium and sugar, and (ii) contains less than 60 mg cholesterol per serving, and accordingly, qualifies for the Logo. The nutrient benchmarks for saturated fat, trans fat, sodium and sugar to be met are the following:

<i>(a) Nutrition Score Benchmarks For Kids Advertising</i>			
Trans Fat (excluding CLA) * - Trans fat content [% of energy]		<2	
Saturated Fat - Saturated fat content [% of energy] - Fat quality [% of total fat]		≤10 ≤33	

Best score counts			
Sodium - Sodium content [mg/kcal] - Insignificant level [mg/serving] Best score counts <u>Product category-specific:</u> - Spreads (as underlayer) [mg/100g] - Soups [mg/serving] - Meal sauces [mg/serving] - Dressings and table sauces [mg/100g] - Meal replacement (weight management) products [mg/kcal]		≤ 1.6 ≤ 100 ≤ 400 ≤ 650 ≤ 600 ≤ 1080 1.3 - 2.4	
Sugars - Total sugars [% of energy] - Added sugars [g/100g]** Added sugars are used when sugars exceed 25% of energy <u>Product category-specific:</u> - Edible ice, added sugars [g/100g]		≤ 25 ≤ 7 ≤ 17 (and 100 calories or less per serving)	

* trans fats are defined as all geometrical isomers of monounsaturated and polyunsaturated fatty acids having non-conjugated double bonds, interrupted by at least one methylene group between carbon-carbon double bonds in the trans configuration.

** added sugars are defined as all caloric (>3.5 kcal/g) mono- and disaccharides from other sources than fruits, vegetables, dairy and whole grain cereals

Note that these benchmarks are not static; they will be subject to regular reviews by an independent international scientific committee to ensure they are up to date with the latest insights in how nutrient profiling works and include the latest scientific and food technology developments.

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);

N/A.
 - b. a representative sample of the messages; and

N/A.

- c. if the messages are to be joined with product advertising, a representative sample of product advertising including the messaging, when available.

N/A.

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

Unilever United States does not intend to advertise food or beverage products to children ages 6 through 11, unless such products qualify for a Logo.

To determine whether advertising on TV, radio, print and Internet is directed to children under 12, Unilever will consider the following factors, no one of which will be controlling:

- i. **Whether the specific medium (e.g., the particular TV show, website, radio show or magazine/newsletter) in which the ad is placed is used primarily by children under 12;**
- ii. **Whether the ad was intended/created to appeal primarily to children under 12; and**
- iii. **For TV ads, whether the ad appears during, or just before or after, a program generally understood to be children's programming, considering the time of day during which the ad appears and the media outlet, or which is counted towards the broadcaster's or cablecaster's Children's Television Act obligations.**



Unilever
Appendix A
Popsicle® brand products

See attached.



Unilever
Appendix B

Skippy® brand products