



**Children's Food and Beverage Advertising Initiative  
Campbell Soup Company Pledge  
Effective as of May 2020**

Campbell Soup Company (“we”, “our” or “Campbell”) is a charter participant 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 under 12 years old. Campbell supports CFBAI’s objectives and is committed to its Core Principles. Campbell is pleased to submit this restated pledge (our “Pledge”), which is consistent with its previous CFBAI pledges and reflects CFBAI’s Core Principles, 5<sup>th</sup> ed. (2020) (“Core Principles”).

**I. Identifying Information**

**1. Corporate Contact Information:**

Campbell Soup Company  
One Campbell Place  
Camden, NJ 08103  
[www.campbellsoupcompany.com](http://www.campbellsoupcompany.com)

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

Individual name: Gregory A. Frantz  
Title: Sr. Marketing Counsel & IP Counsel  
Physical address: One Campbell Place; Camden, NJ 08103  
email address: [mailto:greg\\_frantz@campbells.com](mailto:greg_frantz@campbells.com)  
Phone number: (856) 342-3808

**3. Pledge Coverage:**

Campbell commits that it will advertise only its foods and beverages that comply with [CFBAI’s https://bbbprograms.org/programs/all-programs/cfbai](https://bbbprograms.org/programs/all-programs/cfbai). (“CFBAI’s Uniform Nutrition Criteria”) in its advertising primarily directed to children under age 12 and will not advertise its foods and beverages in advertising primarily directed to children under age 6, each in accordance with our Pledge. Our Pledge is effective as set forth above and applies to advertising in Covered Media (as defined below) by Campbell and its affiliate companies within the United States.

Campbell will provide information regarding foods and beverages it intends to advertise to children under age 12 to CFBAI prior to advertising them so that CFBAI can assess whether such products meet CFBAI’s nutrition criteria, publicly indicate that the products qualify and effectively monitor Campbell’s compliance with our Pledge. The Products covered by our Pledge and their Nutrition Facts Panels are posted on CFBAI’s [website](#).

We may amend our Pledge at any time in consultation with CFBAI.

## II. Core Principles

### 1. Advertising Primarily Directed to Children under Age 12

Campbell commits that advertising for its foods and beverages that is primarily directed to children under age 12 in Covered Media will be for foods and beverages that meet CFBAI's Uniform Nutrition Criteria.

### 2. Covered Media

Campbell's Pledge applies to the following media ("Covered Media"):

- Television
- Radio
- Print
- Internet/Digital media, including but not necessarily limited to:
  - Campbell-owned websites
  - Third-party websites, including display, banner, pop-up, audio or video advertising<sup>1</sup>
  - 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
- Platforms (e.g., YouTube) that may have content or channels that are primarily directed to children under age 12<sup>2</sup>
- Video and computer games that are primarily directed to children under age 12
- DVDs of movies that are rated "G" whose content is primarily directed to children under age 12 and other DVDs whose content is primarily directed to children under age 12
- Word of mouth.<sup>3</sup>

### 3. Product Placements

Campbell commits to not paying for or actively seeking to place its foods or beverages into third-party program or editorial content of any medium primarily directed to children under age 12 to promote the sale of those products.<sup>4</sup>

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<sup>1</sup> User-generated content that is not under the control of Campbell is not covered by the Core Principles.

<sup>2</sup> As provided in the Core Principles, advertising on a platform that uses valid age verification to restrict access presumptively is not primarily directed to children under 12 years old.

<sup>3</sup> Word of mouth advertising refers to advertising primarily directed to children where a participant provides incentives (financial or otherwise), product samples or other support to individuals or groups who are not employees to encourage such individuals or groups to discuss Campbell's branded foods or beverages.

<sup>4</sup> As provided in the Core Principles, 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."

#### **4. Product Integrations**

Campbell commits that the paid for or actively sought integration of its foods or beverages in any medium primarily directed to children under age 12, including in interactive games or other digital content, will promote only foods or beverages that meet CFBAI's Uniform Nutrition Criteria.

#### **5. Influencers**

Campbell commits to use influencers to promote its foods and beverages in communications primarily directed to children under age 12 only if those foods or beverages meet CFBAI's Uniform Nutrition Criteria.

#### **6. Licensed Characters, Celebrities and Movie Tie-Ins**

Campbell commits that its use of third-party licensed characters, celebrities (including athletes) and movie tie-ins in advertising primarily directed to children under 12 years old will be consistent with its advertising commitments set forth above.<sup>5</sup>

#### **7. Advertising in Elementary Schools**

Campbell commits to not advertise its branded foods or beverages to children in elementary schools, from pre-K through 6<sup>th</sup> grade. 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<sup>6</sup>

Our Pledge does not apply to displays of foods and beverages that identify foods that are for sale; fundraising support; public service messaging; curriculum materials; items given to school administrators for their personal use; charitable donations or sponsorships.

### **III. Definitions of Child-Directed Advertising**

Campbell will use the following criteria to define advertising primarily directed to children and to demonstrate compliance with CFBAI's Core Principles.

**Measured media.** For measured media, Campbell will define "advertising primarily directed to children" as advertising for which children ages 2-11 constitute 30%<sup>7</sup> or more of the expected audience (the "audience

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<sup>5</sup> Our Pledge does not apply to other marketing channels, such as point-of-sale materials or packaging (provided that the packaging does not appear in advertising primarily directed to children under age 12). Our Pledge also does not apply to the use of Campbell-owned characters.

<sup>6</sup> Our Pledge does not restrict schools from conducting food or beverage taste tests to assess what foods or beverages to offer for sale at school.

threshold”). The audience demographics that determine compliance with this audience threshold will be measured in media impressions expected to be received by specific demographic groups at the time the advertising is purchased, based on obtainable third-party information (*e.g.*, Nielsen ratings for TV or comScore data for digital media).

Campbell typically purchases linear television advertising once annually, well in advance of when the advertising will air, on a daypart or time block basis. Advertising placed in purchased dayparts or time blocks will be identified as compliant for purposes of CFBAI based on an analysis of the annualized audience composition data for the block of time purchased.

**Digital and online media.** For “contextual advertising,” which is served based on the content that is adjacent to the ad or in which the ad is placed, Campbell will determine whether such content is child-directed based on an assessment of the composition of the audience for that content (if known) or, where reliable audience composition data is not available, an assessment of multiple factors related to that content.

Where audience composition is known, Campbell will consider such advertising primarily directed to children if 30%<sup>8</sup> or more of the audience for the site, app or content in which the ad is placed are children under age 12. Where audience composition data is inadequate to make this determination, such advertising will be deemed primarily directed to children if the ad is placed in content that appears to be child-directed based on an evaluation of multiple factors related to that content, including whatever age demographics for the site or digital content may be available; an assessment of the overall nature of the content, including but not limited to the subject matter of the site or video; the visual content; the language used; the kind of music or audio content; the difficulty of game play; the influencer or influencers featured in the content; actions taken to restrict children’s access to the site or content; and content identifier tools that indicate whether content is child-directed provided by platforms or content developers. Depending on the context, we will consider the weight of such various factors in determining whether such advertising will be deemed primarily directed to children.

Campbell also may use age-targeting tools and interest-based or behavioral factors to avoid serving ads for foods that do not meet CFBAI’s Uniform Nutrition Criteria to children, such as:

1. Age-targeting (based on cookie data or other age indicia) to audiences other than children;
2. Targeting based on interest-based or behavioral data to audiences other than children;
3. Blacklisting of specific sites, channels or other content that are directed to children; and/or
4. Relevant topic, keyword or content classification or identification systems or filters provided by the platform owner or content developer (*e.g.*, an app developer).

#### **IV. Advertising to Children Under Six Years Old**

Campbell commits to not advertise its foods and beverages in advertising primarily directed to children under age 6 within the Covered Media and in accordance with our Pledge.

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<sup>7</sup> As discussed in the Core Principles, the “30% or more” threshold is effective as of January 1, 2021. Campbell may employ a “35% or more” threshold until December 31, 2020.

<sup>8</sup> *Ibid.*