

Mars marketing commitments

Mars, Incorporated owns many of the top snackfood and food brands globally and has a long history of marketing its products responsibly. As we do from time to time, consistent with our corporate values, and consumer expectations, we have revised our Snackfood/Food Marketing Commitments, based on the principles set out below.

Our global Marketing Commitments apply to the marketing communications for all food and snackfood products produced and licensed by Mars, Incorporated. Covered activities include media advertising (e.g., broadcast, print and digital, including websites), advertorials, sponsorship, and promotions, contests and similar promotions for our food and snackfood products.

Our Marketing Commitments are applicable in addition to all the statutory or self-regulatory requirements applicable in every market. Where possible and subject to our existing contractual obligations, these commitments will be implemented immediately. Full implementation of all commitments is expected to be completed by the end of 2009.

I. General Principles

We believe in healthy eating and pride ourselves on the high quality of our products. Based on sound scientific knowledge, we know that they can form part of a healthy and enjoyable diet for consumers of all ages.

- Our communications will not undermine the pursuit of a

- healthy, balanced diet and active lifestyle.
- Our communications will not encourage or condone excessive consumption of any food or drink.
 - Our communications will not promote compulsive snacking.
 - We will not associate our products with people who are excessively underweight or overweight.
 - We will not use a celebrity in a way that might mislead consumers about the benefits of our brands.
 - We endorse initiatives to encourage active lifestyles including the sponsoring of sports events.
 - We will direct our marketing communications in all media to adults who make household purchasing decisions (gatekeepers) and young people 12 and over, both in terms of ad content and media purchasing.
 - We will continue to offer responsible and creative advertising featuring our products, trademarks, brands and spokescharacters suitable for our intended audiences.

II. Principles regarding marketing to children

Advertising

- We will not advertise our food and snackfood products in media primarily directed to children under 12, both in terms of ad content and media purchasing. For purposes of this commitment, we will not purchase advertising time or space where the composition of the under-12 audience at the time of the media buy is expected to exceed 25%.

- We will not advertise, sponsor or undertake product placement in films or media programming where the intended audience is primarily children under 12.

Portrayal of children

- We may show children under 12 in our marketing communications if relevant to the marketing message e.g. depiction of a family situation or activity
- When we do show children under 12, we will neither show children under 12 consuming our snackfood products nor allow them to act as a spokesperson for the brand. We will not portray physically inactive children, e.g. just watching TV or playing inactive computer games.

Seasonal themes

- Our advertising around seasonal themes and events, such as Easter, Christmas, Mother's Day, Back to School or Halloween, which may be relevant to children, will be primarily directed to gatekeepers.

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Celebrities and licensed characters

- We will not use a celebrity or third-party licensed characters intended to appeal primarily to children under 12 to promote our snackfood products.

Schools

- We will not place vending machines offering our core snackfood products in primary schools.
- We will not offer branded educational materials for use in schools by children under 12.
- We will not sponsor sports events in primary schools.
- We will continue to donate funds or products to schools and community institutions where the school/institution has specifically requested this support in writing.
- We will continue to engage in activities aimed at children regarding nutrition, health or physical exercise, in co-operation with government and/or other recognized authorities.
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Digital media and promotions

- Text and Internet promotions will be primarily directed to participants over the age of 12. We will not advertise or promote our websites in venues primarily directed to children under 12.
- We will use age-screening techniques to ensure that only young people above 12 can download branded wallpaper, screensavers or other leave behind material from websites of potential interest to younger audiences.

We will periodically review and update the Mars Snackfood/Food Marketing Commitments to ensure they remain consistent with our corporate values and principles.