



pladis UK and Ireland Principles for Responsible Advertising and Marketing Communications

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1. Introduction

At pladis UK & Ireland¹ we believe that advertising and marketing are valuable communication tools which can be used to help consumers make informed snacking choices. We also believe that all our snacks can, and should, be enjoyed as part of a healthy, balanced diet. As a business we are committed to responsible advertising and marketing communications, not only in the promotion of our brands but also in promoting and encouraging healthy and active lifestyles globally.

This policy brings together and expands on the United Biscuits Policy for Marketing to Children with the Yildiz Holding Responsible Nutrition Communications guide and incorporates the ICC Responsible Marketing Principles of the International Chamber of Commerce's Principles: General Provision on Advertising and Marketing Communication Practice and the Framework for Responsible Food and Beverage Marketing Communications². It also incorporates best practice industry policies and voluntary code of practice standards to form a best-in-class responsible advertising and marketing communications policy.

This policy enables pladis UK & Ireland to advertise and promote our products in a responsible manner. pladis currently, and will always, complies with all national legislation on marketing and advertising in the countries in which we operate. The commitments in this document are additional to national statutory requirements for the advertisement and promotion of foods and, therefore, form a minimum standard for markets where there is no legislation on advertising and promotion.

2. Scope

This policy applies to the marketing and advertising of all pladis brands and products in the United Kingdom and Republic of Ireland.

This policy applies to all media channels as follows: broadcast (e.g. television, radio, cinema); print; mobile phone (apps, mobile phone and SMS marketing); internet/digital media including social media; market influencers (bloggers, vloggers and affiliate networks); multimedia entertainment (e.g. DVDs, video sharing, games including interactive games and advergames); advertorials; sponsorship; brand press releases and promotions; direct marketing; product placement; in-store activation, shopper marketing and out of home; rewards as well as virtual and marketing communications using artificial intelligence and any yet-to-be-developed media platforms.

¹ pladis UK & Ireland is a trading name of United Biscuits (UK) Ltd.

² International Chamber of Commerce (2019) Framework for Responsible Food and Beverage Marketing Communications <https://cdn.iccwbo.org/content/uploads/sites/3/2012/09/Framework-for-Responsible-Food-and-Beverage-Marketing-Communications-2012.pdf>



3. Our general principles for advertising and marketing communications

- 3.1 All our advertising and marketing communications are legal, decent, honest and truthful: our communications messages will accurately represent our products and not mislead.
- 3.2 Our communications messages do not and never will undermine or distort the importance of a healthy, balanced and nutritious diet and physical activity or positive social behaviour and attitudes.
- 3.3 Our communications messages do not encourage excess consumption of any of our products.
- 3.4 Our communications messages will depict realistic and responsible portion sizes.
- 3.5 Our communications messages do not present our products as an alternative to complete, regular meals.
- 3.6 Our communications messages do not and never will encourage excessive snacking or create a sense of urgency.
- 3.7 Our product health and nutrition claims will not mislead and will be founded in robust scientific evidence and data. We comply with all relevant local legislation on such claims.
- 3.8 We will provide information on what constitutes a healthy, balanced diet as well as the role of responsible snacking within a balanced diet, on our company and branded websites to help our consumers to make informed dietary choices.
- 3.9 We will provide nutrition information on the back-of-pack nutrition label on all our products and will provide front-of-pack calorie labelling as a minimum on our products.
- 3.10 By 2025, we will ensure all front-of-pack nutrition labelling is reflective of responsible, reasonable and transparent serve size, and that for portion packs, nutrition information is provided per pack.
- 3.11 We will not undertake advertising and marketing activities that encourage consumption above category normal levels.
- 3.12 We will not provide giveaways that actively encourage sedentary behaviour.
- 3.13 We do not associate our products with people who are unusually over (BMI >30 kg.m²) or underweight (BMI <18.5 kg.m²).
- 3.14 We will encourage healthy behaviours, i.e. healthy eating, physical activity and positive mental health and will endorse activities and initiatives which encourage such healthy behaviours.



4. Our additional requirements for advertising and marketing communications to children

We take particular care when it comes to children and we wish to encourage positive social behaviour, healthy lifestyles and attitudes. In the United Kingdom and Republic of Ireland, a child is defined as anyone under 16 years of age.

The following requirements apply to children in addition to our general principles for advertising:

4.1 We commit not to advertise, market or promote our products directly to children under 16 years of age via any channel (see page 1 for scope).

4.2 We will not advertise our products on broadcast media when children under 16 years of age make up more than 25% of the media's audience size.

4.3 We will not advertise through, or gift our products to, social media influencers when children under 16 years of age make up more than 25% of the media's audience size.

4.4 We will direct our advertising and marketing communications to adults who are the household purchasing (gatekeepers) decision makers for children under 16 years, and such communications are intended to enable such gatekeepers to make informed purchasing decisions.

4.5 We will not undermine the role of parents or other adults responsible for a child's diet and lifestyle choices.

4.6 We will not use any licenced characters on our products or in their advertising, marketing or other promotion. We will also not use celebrities or mascots which directly and primarily appeal to children under 16 years of age. Additionally, we will not participate in movie tie-ins that are primarily directed at children.

4.7 We will not have games or promotions on our corporate or branded websites that are aimed at children under 16 years of age, unless an education content is included, and access will require parental consent.

4.8 We will not undertake any advertising or marketing communications which could exploit a child's imagination in a way that could mislead them about the benefits of the product involved (physical, psychologically or socially) or create expectations of success or popularity.

4.9 We will not depict children consuming our products in any advertising or marketing communications. We may, however, show children in our advertising or promotion activities within a family context where appropriate. In such instances, a gate keeper must be shown to be controlling access.

4.10 We will not market, promote or sample our products in schools unless specifically requested by, or agreed with, the school administration.

4.11 We may sponsor sporting teams or events but not use logos on sports kit (or other items) for children under 16 years of age.