



RESPONSIBLE MARKETING POLICY 2024

All Marketing communications in this policy must comply with all relevant laws/regulations in the local country.

What activities does this policy apply to?

This policy applies to Arla Foods marketing communications directed to consumers.

This covers marketing communications including but not limited to television, radio, outdoor, digital incl. both companies owned websites and third-party websites, social media, apps, online games, sponsorships and direct marketing and all other forms of communication, excluding packaging.

What consumers is this policy aimed at?

This policy refers to communication activities aimed at all consumers, with added provisions for communications directed to children.

The UN Convention on the Rights of a Child defines children as those under 18 years of age. As such, Arla Foods will ensure that specific provisions of its policy are respected when communicating to children falling within this age group.

Finally, the best available academic and scientific evidence suggests that special protections should be afforded to children under 12 years. For this reason, Arla Foods has another set of specific measures which apply to children under 12 years which is now extended to under 13 years in alignment with the EU Pledge enhanced commitment 2021.

To determine if marketing communications are “directed to children” in the above age groups, we will take into account the placement (e.g. media audiences – where over 25% of the audience are children, below the age of 18 and 13 respectively as well as the content of those communications and, specifically, if they are likely to be of particular appeal to children in the above-mentioned age groups.

What other regulations apply in addition to this policy?

Marketing communications must comply with all relevant laws/regulations in the local country. Our commitments go above and beyond these laws/regulations; the backbone of the document is based on collaboration with EU Pledge. To abide by the International Chamber of Commerce (ICC) Code of Advertising and Marketing Communication Practice; and the ICC Framework for Responsible Food and Beverage Marketing Communications in all marketing communications in alignment with the EU Pledge enhanced commitment 2021.

Last but not least, Arla Foods uses the Health Star Rating (HSR*) to set the standard by which all brands may or may not be advertised to children under 18 and are referred to throughout this policy. As per the HSR guidelines, a product scoring $HSR \geq 3.5$ is deemed to be a healthy product.

For marketing and communication to all consumers, Arla Foods will:

1. Factually present its dairy products and recipes in all its advertisements in a way which does not attempt to mislead consumers.
2. Present nutrition and health claims in compliance with international standards either the European Food Safety Authority (EFSA) and local country regulations, or Codex Alimentarius standards if no country regulations exist.
3. Neither encourage nor condone overeating; and portion sizes must be represented as appropriate for the intended consumers.
4. Not represent products as substitutes for meals when they are not intended as such.

In addition, for marketing and communication directed to all children under 18, Arla Foods will:

1. Always promote healthier products which are defined as products meeting the HSR ≥ 3.5 criteria benchmark.
2. Not insert marketing communications directed to children in media where the editorial content is inappropriate.
3. Be mindful when undertaking communication to children so as not to undermine positive social behaviour, lifestyles and attitudes; whilst supporting the role of parents and other appropriate adult role models by providing information on the nutritional profile of healthy products, where relevant.
4. Not mislead about the potential benefits from the consumption of a product, such as status or popularity with peers, sports success, and intelligence.
5. Exclude any direct appeal to children to persuade their parents or other adults to buy an advertised product for them.
6. Not exploit the inexperience or credulity of children. Marketing Communications & Sales promotions will be presented in a transparent way such that they are distinguishable to them as such; and children & parents are aware of any conditions before they make the decision to purchase.
7. Not use media personalities (live or animated) or fantasy to sell products, premiums or services in a way that obscures the distinction between programme or editorial content and commercial promotion. For example, commercials or advertisements featuring characters will not be aired adjacent to programmes or articles in which the same personality or character appears.

And adding to the above, for marketing and communication for all brands directed to children under 13 years, Arla Foods will:

1. Always promote healthier products which are defined as products meeting the HSR ≥ 3.5 criteria benchmark.
2. Only use licensed or non-licensed cartoon characters and celebrities appealing to children aged below 13 in association with products which meet the HSR ≥ 3.5 criteria benchmark.
3. Refrain from placing in the content of a children programme, any Arla Foods products for the purpose of promoting sales of such products.
4. Only promote brands or products in primary schools including displays, charitable fundraising activities, public service messaging, sales or advertising directed to school administrators, at their request or when agreed with them.
5. Participate in campaigns for educational purposes to promote cooking/baking of healthy, balanced recipes.
6. Not work with individual influencers under the age 13.
7. Not use influencers whose primary target audience is children under the age of 13.

8. When collecting personal data of children below 13:

- Inform parents or legal guardians of the rights of children to privacy if feasible.
- Require children to obtain a parent's or responsible adult's consent before providing personal data.
- The consent of the parent is also needed for this data to be used for marketing communications to children, their parents and/or other family members.
- can only be disclosed to third parties where consent from a parent or legal guardian has been given or where disclosure is required by country law.
- Can be used by company's agents or providers of technical or operational support for the purpose that consent has been given and not any other purposes.