

KELLOGG COMPANY
WORLDWIDE MARKETING AND
COMMUNICATION GUIDELINES



INTRODUCTION

W.K. Kellogg set the tone for our continued commitment to protecting and promoting consumer confidence when he put his name on every product as a personal assurance of quality. We continue to be committed to responsibly marketing and communicating the intrinsic quality of our brands so that our consumers can make informed choices.

These guidelines are the basis for our consumer communications, ensuring that we have uniform standards of marketing and communication across the world. They apply to all forms of marketing and advertising, including:

- television
- radio
- print
- digital media
- social media
- cinema
- mobile and SMS marketing
- gaming
- events
- sponsorships
- product placement
- contracted influencers

We understand that consumer values and customs may vary from country to country, but the basic principles offered here provide sound guidance for all Kellogg marketing and consumer communication, no matter where our consumers live.

These guidelines will supplement, not replace, our existing obligations under local regulations or self-regulatory programs in which Kellogg participates. In addition, Kellogg applies, and these guidelines are consistent with, the International Chamber of Commerce (ICC) code of Advertising and Marketing Communication Practice, the ICC Framework for Responsible Food and Beverage Marketing Communications, and the Kellogg Advertising Brand Safety Guidelines.

COMMUNICATION TO ALL CONSUMERS

- Our communications will embrace the diversity of our consumer base and will not undermine human dignity by incorporating stereotypes, belittling or disparaging any group or person based on social, racial, ethnic, religious, gender, age, sexual orientation or physical traits.
- We will not engage in political debate in our advertising content or placement.
- Our communications will not intentionally exploit the misfortunes of others, display vulgarity, bad manners or offensive behavior.
- Our communications will not portray adults or children in antisocial situations or engaged in acts harmful to themselves or to others, or include violence, sexual activity or innuendo.
- Our communications will not use models with a BMI less than 18.5.
- Our communications will present products in a context that supports the Company's approach to Wellbeing.
- Our communications will provide helpful information to assist consumers of all ages in choosing healthy diets and active lifestyles.

DIGITAL

- All content will:
 - Clearly identify the sponsoring company or brand, and include links to contact information, privacy notice and terms and condition of participation;
 - Clearly differentiate advertising from content in digital media by labeling advertising;
 - Ensure any Kellogg-owned or sponsored sites designed for individuals 13 or older do not contain games or other interactive features that appeal primarily to children younger than 13; and
 - Utilize age screening devices and/or parental consent options for Kellogg-owned or sponsored sites featuring products that do not meet Kellogg Global Nutrient Criteria ("KGNC") where the content may appeal primarily to children younger than 13.
- In our social media marketing, we will follow the Word of Mouth Marketing Association's (WOMMA) code of ethics, standards and social media disclosure guidelines.

- We will not develop, sponsor or place content - including advertising, native or programmatic - on channels or programming that focus on violence, sex or encouragement of anti-social behavior.
- When working with website owners, bloggers, celebrities, personalities popular on social media, or other influencers to discuss and promote our products, we will require that the influencer clearly disclose his/her connection to Kellogg and note that the content or review is a form of advertising.
- We will not post “example” or “fake” reviews on e-commerce sites, websites which are not commerce enabled, or social media to seed ratings on Kellogg products.
- Kellogg employees who post negative reviews of competitor brands must disclose that they are Kellogg employees using any one of the following hashtags: #Employee, #KelloggEmployee, #IWork4Kellogg, #IWorkForKellogg, or #IWork@Kellogg.
- In a virtual community or other consumer interactive forum in which consumers can communicate or interact with Kellogg or other consumers to share content, we will:
 - Provide community guidelines that define parameters of acceptable participation;
 - Provide a description of purpose and topics and/or content to be shared;
 - Require registration or other form of sign-on, including “click to agree” to community guidelines;
 - Reserve the right to monitor or manage content through a community-based, self-monitoring process and/or an internal Kellogg monitoring process; and
 - Reserve the right to resolve concerns including, but not limited to, the ability to block access or terminate participation for violation of any guidelines or agreements.

GAMING

The following guidance applies to game sponsorships, gaming event sponsorships, influencer/gamer sponsorships, co-marketing partnerships, promotions, and product, brand, and character placement and licensing, including games.

We will comply with these guidelines or a local gaming rating system, whichever one is stricter, in each of our markets. We will always conform our brand target audience with the corresponding game rating. Where applicable, we will comply with our marketing to children pledge criteria.

We will not sponsor, promote or place products or brands in games that depict:

- Activities which are illegal, offensive, degrading, corrupt, threatening, discriminatory or obscene;
- Stereotypes based on social, racial, ethnic, religious, gender, age, sexual orientation or physical traits;
- Unmitigated violence;
 - Mitigation considerations include:
 - The game is played in a fantasy environment;
 - The player is not in control of the violence;
 - The violence does not include blood, injury, or the display of bodies; and,
 - Guns, swords or other weapons are not shown on our package graphics or promotional materials.
- Violent or offensive language directed aggressively at another player or character;
- Use of drugs as a meaningful part of the storyline or tied to game incentives or rewards;
- Sexual references or overtly sexual content as a meaningful part of the storyline; or
- Opponents / enemies should not be based on religion, gender, gender identity, race or ethnicity.

MARKETING TO CHILDREN

Children younger than 6 years old: We do not market products to children younger than six years old.

Children ages 6 – 12 years old: We will only advertise products that meet our KGNC on media primarily directed to children younger than 13.

“Primarily directed to children younger than 13” generally means media that have a projected audience at the time of media purchase of 30 percent¹ or more children younger than 13.² Where younger than 13 audience composition data is not maintained or available, Kellogg will consider other factors as appropriate, which may include the overall impression of the advertising, actions to restrict child access and the target demographic based on Kellogg’s media plan.

In addition to the above guidelines applicable to all consumers, Kellogg takes special care to communicate responsibly with children younger than 13. We will:

- Support the role of parents or others responsible for guiding diet and lifestyle choice;
- Be mindful not to create an undue sense of urgency or use inappropriate price minimization;
- Accurately portray our products, promotions and premiums in a way that is keeping with children’s ability to understand;
- Encourage appropriate safety gear for physical activities according to guidelines published by locally recognized sports or safety associations;
- Depict our trademarked characters as trustworthy figures and look for opportunities to use them to encourage all aspects of wellbeing including physical, societal and emotional;
- Offer clear and appropriate nutrition information that will not mislead children to believe that consumption of a product will directly result in changes such as popularity, intelligence or athletic ability; and

¹ The 30 percent threshold becomes effective globally on December 31, 2021. Prior to that, a 35 percent threshold will be used.

² For markets where audience data for younger than 13 is not generally available, we will work to identify alternative solutions to estimate the proportion of children younger than 13 in the audience.

- Prevent confusion by not paying for or seeking out promotional product placement for any product in media directed to children.

Kellogg Global Nutrient Criteria (KGNC):

- No more than 200 calories per serving
- No more than 2g saturated fat/0g trans-fat per serving
- No more than 230mg of sodium per serving (or 460mg of sodium for Eggo® frozen waffles/products since typically served as entrees and sodium being used as leavening agent necessary to the functionality and form of the food)
- No more than 12.5g (12g labeled) of sugars per serving (excluding naturally occurring sugars from fruit and dairy)

Starting December 31, 2021:

KGNC	Calories (kcal/portion)	Total Sugar (per 100g)	Sodium (per 100g)	Sat. Fat (per 100g)	Components To Encourage
RTEC	≤220	≤35 g	≤650 mg	≤5 g	≥½ serving or first ingredient WG OR provides an essential nutrient
Waffles Pancakes	≤300	≤25 g	≤600 mg	≤5 g	≥½ serving or first ingredient WG OR provides an essential nutrient
Portable Wholesome Snacks	≤200	≤35 g	≤550 mg	≤6 g	≥½ serving or first ingredient F/V/D/M/WG OR provides an essential nutrient

Noodles*	≤360	≤5 g	≤500 mg	≤5 g	≥½ serving or first ingredient WG OR provides an essential nutrient
Plant-Based Meat Alternates	≤250	≤10 g	≤800 mg	≤6 g	Protein ≥5g/100g OR provides an essential nutrient

*Thresholds apply to food as reconstituted, ready for consumption following manufacturer’s instructions

SCHOOLS

- We will not advertise any products to children in elementary schools (children younger than 13) except as permitted in these guidelines, and subject to school rules and permission. Exceptions include:
 - Displays used to hold our products, including materials that identify products being offered for sale;
 - Charitable fundraising activities;
 - Public service, including educational messaging;
 - Items provided to school administrators for their personal use; and
 - Charitable donations to schools.
- For all schools with students 13 or older, advertising of products primarily directed to students will be subject to school rules and permission, and must relate to physical, societal or emotional wellbeing.
- Product sampling and product-related research in schools with students 13 or older is permissible with the express written consent of the school administration and a parent/legal guardian of each participating student prior to the activity.

USE OF CELEBRITIES AND LICENSED PROPERTIES

The following rules apply specifically to the use of celebrities that appeal to children younger than 13 and of child-directed, third-party licensed properties (e.g., characters, games, toys, movies):

- We will not use these celebrities and licensed properties in communications primarily directed to children younger than 13 in connection with products that do not meet KGNC;
- If we use these licensed properties as the basis for a food form/product, we will only advertise such product in media primarily directed to children younger than 13 if that product meets the KGNC; and
- Advertisements featuring celebrities or characters from programs will not be placed adjacent to programs in which the same celebrity or character appears for foods that do not meet KGNC.

EVENTS\SPONSORSHIPS\PROMOTIONS

- A brand may sponsor an event primarily directed to children younger than 13 if the products and merchandise promoted and distributed by the brand meet KGNC.
- A Kellogg-owned character may attend an event primarily directed to children younger than 13 if the character is associated with a product that meets KGNC.
- Premiums, contests and promotions primarily directed to children younger than 13 are permissible for products that meet KGNC.

COMPLIANCE AND MONITORING

Kellogg will ensure compliance with these guidelines. We provide comprehensive training to our marketers and agencies on these guidelines and the external self-regulatory programs Kellogg participates in. If we become aware of a placement or practice that violates these guidelines, we will act to correct it.

Kellogg participates in several global, regional and local self-regulatory food marketing programs as outlined in our Corporate Responsibility Report. We annually monitor and report compliance with our guidelines as part of our participation in these programs, which is verified by independent, third party auditors. We review monitoring results and work with our marketing and

media teams to address incidences of noncompliance and implement the appropriate corrective action to prevent future issues. These compliance reports are publicly available, and Kellogg results are disclosed in our annual Corporate Responsibility report.