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BARILLA'S PRINCIPLES ON RESPONSIBLE FOOD MARKETING

May 2018

SCOPE

Barilla's brands are the core of the Barilla Company's identity. According to our [Code of Ethics](#), the coherence of products and the quality of our communication will guarantee continuous support for all our brands.

At the base of this commitment, Barilla shall:

- guarantee a **relationship of trust and loyalty** with its consumers;
- take into consideration **the higher order of intellectual and cognitive needs** that naturally cause people to consider what they are eating, rather than focusing exclusively on biological needs.

The following Barilla's Principles on responsible food marketing are applicable to all of Barilla's food marketing activities and communications globally. They apply to all forms of marketing and advertising which include but are not limited to: packaging and labelling, television and radio advertising, consumer promotions, in-store activities, PR materials, online activities, all forms of social media, and digital advertising, apps, online games and direct marketing; and all other forms of communication (e.g. product placement, adver gaming, free gifts/toys, etc).

Marketing activities, of course, will continue to comply with all relevant laws and regulations in any country.

TARGET

These principles apply primarily to employees involved in marketing, sales, corporate communication and external relations activities. Nevertheless these principles shall be followed by all employees when promoting (in the broad sense) Barilla Group's branded goods.

GENERAL PRINCIPLES

We are aware of the influence that marketing activities can have on people's beliefs and behaviors and therefore we pay particular attention to the influence that our marketing activities can have on our consumers.



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In particular:

1. All the marketing communications have to be **respectful of the centrality of human beings**, with their complex mix of physical, psychological, cultural and emotional needs.
2. Marketing communications shall never prevent **full transparency** of the content, benefits and proper use of products.
3. Marketing communication shall avoid to include manipulative content and shall **not include concealed, contradictory, uncertain and/or ambiguous messages**.
4. We are committed to promote and support **healthy lifestyles**. Particularly:
 - a. Marketing Communications should **not encourage or condone excess consumption** and **portion sizes** should be appropriate.
 - b. We are committed to communicate how our brands and products fit into a **healthy and active life**.
 - c. We will avoid to embellish and/or present as desirable diets and consumption habits that **lead to unhealthy conditions** (e.g. undernourishing, unbalanced or unnecessarily selective diets, underweight models in commercials, etc.)
 - d. We are committed to provide nutritional information to our audiences in the **most objective and relevant way possible**.
5. Nutrition, environmental and health benefit claims should have a **sound scientific basis**. Greenwashing practices must be avoided.
6. For us food should represent a **positive daily experience** and people should be reassured about their food-related concerns in a constructive and not scaring way.
7. We believe all marketing activities shall **respect everybody's different values, beliefs, gender, races, religions and cultures**. We will not leverage or depict as desirable behaviors that are discriminating anyone.
8. Barilla communication shall not include **vulgar and/or sexually explicit** messages.
9. We are committed in guaranteeing **animal welfare** in all our marketing activities and we don't accept animal exploitation for any reason.

MARKETING TO CHILDREN

As a responsible business, Barilla is committed in **taking into account children as sensitive stakeholders and respect their universal rights** as they are explained in the *UN Convention on the Rights of the Child*. Barilla's marketing communications are developed in the **best interests of the child** and respecting children's freedom of expression, development, education, recreation, health and wellbeing. We believe that **the "access to complete and**



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“accurate information” is a fundamental right that children have, as well as an appropriate right to privacy.

We are aware of the impact that marketing activities can have on the development of children’s beliefs and behaviors and we know that children’s ability to critically engage with traditional broadcasting marketing techniques is limited by their inexperience, innocence and immaturity. Moreover their capacity to avoid the impacts of stealth advertising techniques, especially in the digital marketing, is non-existent.

For these reasons, Barilla has the responsibility to carefully manage every marketing activity dedicated to children, **avoiding any communication that can put children at risk of exploitation, manipulation and commoditization.**

We specify that in these principles “advertising to children” especially refers to advertising to media audience with a minimum of 35% of children under 12 years.

Particularly:

1. Marketing Communications directed to children **shall not depict as aspirational and appealing behaviors that are discriminatory**, bullying, etc.
2. Marketing activities should be **explicit, not concealed and/or camouflage** in other forms (e.g. video games). Their commercial nature should not be concealed.
3. Marketing activities **should not substitute parents/institutions** in their educational role.
4. Marketing Communications directed to children **should not mislead about potential benefits** from the consumption of a products, such as status or popularity with peers, sports success and intelligence.
5. Marketing Communications should not include **any direct appeal to children** to persuade their parents or other adults to buy advertised products for them.
6. **Poor dietary habits** should not directly or indirectly be supported.
7. Marketing Communications should **support parents and adults in understanding the right nutritional profile** of products.
8. Marketing Communications do not have to re-create **a sense of urgency** or price minimization (using terms such as “now” referred to time and “only” referred to price).
9. Given the nutritional **benefits of certain foods** Barilla will show children enjoying such foods.
10. Children can’t be used as **spokespersons** for Barilla’s products.



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Nutrition and Healthy Lifestyle

All Marketing Communications directed to children more than 3-years-old aged has to meet the **EU Pledge Nutrition Criteria**.

- All the products *aligned* with the EU Pledge Criteria, could be communicated to children, promoting – at the same time – a healthy life-style.
 - All the products *not aligned* with the EU Pledge Criteria, could be communicated to children, specifying the appropriate responsible consumption manner, in a clear and understandable way for the children and their parents.
- **Any stricter local law on this topic will be carefully respected.**
 - Barilla will promote **fun and active lifestyles** as part of its marketing campaigns directed to children.
 - **Licensed or non-licensed cartoon characters** and celebrities appealing to children will only be used on and in association with products meeting the Nutrition Criteria.

Primary Schools

- Barilla believes that **schools should not be used** as vehicles to promote products to children, build children's brands loyalty or influence children's purchase preferences. For this reason, Barilla doesn't actively promote its products in primary schools.
- **Other contexts where children gather** (playgrounds, sports fields and care centers): in case of Barilla's marketing communications in contexts where children gather, contents will be carefully checked considering the best interest of children to an appropriate information.

Educational Programs

Barilla believes that an appropriate education to food and healthy lifestyles is fundamental for children. They are not, indeed, occasions for marketing products or appealing to children. In case of specific **educational projects**, led by Barilla itself or in which Barilla is involved, Barilla may participate with branding levels agreed with a third-party education body to ensure transparency, the best interests of children and quality education.

Market Researches

Barilla can conduct market researches involving children to understand how a product can contribute to their wellbeing and taste. In any research, we will commit to ensure safety



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and secure information for children; we will require the informed consent of a parent or legal guardian. In no way we will ever ask any question or share any statement that would persuade or drive children's will towards our products purchase. We will collect data anonymously, protecting the privacy right of children.

Data Collection

Any local law or regulation on age limits for personal data collection will be carefully respected. Barilla will only collect personal data of minors of age under the applicable laws under explicit consent of the parent/s or custodian. In any case, Barilla does not collect personal data from children below 12 years of age.

COMPLIANCE AND REPORTING

It is the responsibility of all the Barilla People and external marketing communications agencies to comply with these principles.

The ownership of these principles and the observation of their respect **belongs firstly to the hierarchy line** of each involved manager in their application.

The general supervision of the application of the principles belongs to the **Chief Marketing Officer**, the **Chief Communication and External Relations Officer**, the **Chief Compliance Officer** and the **Regional Presidents** of the Group.

Barilla will evaluate the effectiveness of the policy and commits to **regularly reporting the results** in the Sustainability Report of the Group.

We commit to **review and update these principles** every three years, to ensure that our commitments align with developments in the external environment, possible changes in the Group's organization and a continuous dialogue with relevant stakeholders on this field.

