

# **FERRERO**

Advertising and marketing principles

# Our responsible marketing approach

At Ferrero, we value the relationship of trust we have built with our consumers and this respect guides our marketing approach. As one of the leading producers of sweet-packaged foods, we connect with consumers around the world through our marketing efforts and recognise that responsible marketing can be a powerful force for positive behavioural change.

That is why we are committed to helping our consumers make informed and thoughtful choices about product consumption. This means that:

- We are committed to truthful, fair and evidence-based advertising;
- We do not market our products primarily to children under the age of 13, recognising that they are a particularly vulnerable audience and deserve special consideration;
- We encourage responsible consumption of our products and balanced lifestyles;
- We treat people's data and privacy with the highest level of care and in full compliance with applicable regulations;
- We are sensitive to cultural and social circumstances.

At Ferrero, we adhere to strict marketing principles that often exceed legal requirements, particularly in protecting children.

We commit to ensuring that all communications are truthful, accurate, and fully aligned with the codes adopted by the International Chamber of Commerce (ICC), including both the [Advertising and Marketing Communications Code](#) and the [Framework for Responsible Food and Beverage Marketing Communications](#), and apply the [Global Responsible Marketing Policy](#) through our membership of the International Food & Beverage Alliance (IFBA).

We believe that when companies hold themselves to high standards in how they communicate, it builds real trust with people. That is why we actively support self-regulation both at local and international level; not just on our own, but by working closely with global industry groups like the World Federation of Advertisers (WFA).

Our consumers enjoy our products in more than 170 countries and we are committed to constantly evolving our approach to ensure our marketing communications help them make informed purchasing decisions about the foods they buy and eat.

At Ferrero, we believe that when we make voluntary environmental claims about our products, they should be reliable, relevant, clear, transparent, substantiated and accessible, to allow consumers to make informed purchasing decisions.

Our marketing also reflects our broader commitment to Diversity, Equity & Inclusion (DE&I) by promoting respectful, inclusive messaging that resonates across cultures and communities.

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### Responsible marketing to children

Ferrero believes in the crucial role played by parents in educating their children to follow a balanced diet and a healthy and active lifestyle.

We recognise that children are a particularly vulnerable audience and deserve special consideration. That is why we are committed to responsible marketing practices which support parents and caregivers in making informed food choices for their families.

We also recognise the importance of play, leisure, and cultural expression in children's lives, in line with [Article 31 of the United Nations Convention on the Rights of the Child](#). Through our core brands and digital initiatives like Applaydu, we aim to combine entertainment with education, by offering engaging activities that support positive behaviours and the development of life skills.

At Ferrero, we believe our products should be consumed in moderation as part of a balanced diet and we follow responsible marketing principles that avoid targeting children globally, which means we:

- Respect the role of parents and caregivers as decision makers and avoid product marketing communications primarily directed to children under 13;
- 'Primarily directed to children under 13 years old' means advertising in measured media where 30% or more of the audience is under 13 years of age. Where adequate

data are unavailable, Ferrero will consider other factors such as the overall impression of the advertising, actions taken to restrict child access and the target demographic based on the company's media plan. The following media are in scope: TV, radio, print, cinema, online (including social media, company-owned websites and video-sharing platforms such as YouTube), DVD/CD-ROM, direct marketing, product placement, interactive games, outdoor marketing, mobile marketing, contracted influencers, branded sponsored events.

- Adhere to voluntary commitments, with strict internal governance in place and compliance monitored by independent organisations.
- Commit worldwide not to carry out any communication, distribution, sampling or any other form of advertising around our products in primary and secondary schools (or equivalents such as high schools) unless specifically requested by, or agreed with, the school administration for educational or sports purposes.
- The only exception is for products that reflect the concept of nutrient density, offer more nutrients relative to calories and promote nutritional improvement by encouraging desirable nutrients and ingredients. These products, which sit in Class 1 of the Ferrero Nutrition Criteria (FNC), are excepted if compliant with relevant standards or local regulations for advertising to younger audiences.

## Portrayal of children

Our advertising and marketing strive to promote balanced and active lifestyles, especially when it concerns children. We avoid showing children engaged in inactive behaviours. We also avoid showing children under 13 accessing or consuming our products alone. Where we do feature children under 13 in our marketing communications, we show them in a family setting or occasion where a parent or gatekeeper is present and able to control the child's access to the product.

## Brand and licensed characters

Ferrero is committed to not using third-party licensed characters in marketing communications in such a way that would primarily appeal to children under 13 years of age.

We also take care to feature any brand-owned characters or other celebrities in our advertising in a way that does not serve as a hook to promote our products primarily to children, or blur the line between creative/informational content and commercial promotion.

Consistent with industry-led voluntary commitments of which we are part, Ferrero reserves the right to continue to use its brand-owned characters for all audiences, noting that these form a key aspect of our brand identity and are crucial to fostering continued emotional engagement and consumer loyalty with our products.

## Influencer marketing

We only engage or partner with influencers aged over 18 and do not engage with influencers whose target audience is composed primarily of children under 13. All our partner agencies and influencers must follow our Legal Marketing

Ferrero only engages and partners with influencers aged over 18...

...whose content aligns with our principles and who can provide data about their audience demographics.

Guidelines on Influencers when developing content aimed at a young adult audience, ensuring all our marketing remains truthful, honest and objective. We require influencers to disclose their partnership with Ferrero, and to ensure that all content uploaded is in line with our Responsible Marketing commitments which prohibits, for instance, any form of marketing that encourages the over-consumption of our products.

For global projects, to ensure compliance with different definitions of children across the world, we avoid engaging or partnering with any influencers whose target audience is composed of 25% or more of people under 16 years of age (this can be raised to 18 years old, for certain specific jurisdictions). Prior to engagement, all our partner agencies and influencers must provide audience data, demonstrating that their communications are aligned with the above position, and we do not communicate through any social channels where such data has not been provided.

## Sponsorship

Ferrero commits globally not to sponsor events primarily aimed at children under 13. This includes any sporting and

entertainment events such as child-directed concerts, fairs, parties or amusement parks primarily appealing to children under 13, where products could be made available in return for payment or other incentives, including the offering of free products. An event considered child-directed would involve situations where 30% or more of the attendees or participants are children under 13, and no parents or guardians are present nor have given their consent.

This commitment does not include Ferrero's brand and corporate social initiatives, designed to engage children in physical or educational development activities, which are not used for sales generation or direct product promotion. Charitable events, donations, and factory visits which have an educational, community or social value are also not included.

## Schools

Ferrero commits worldwide not to carry out any communication, distribution, sampling or any other form of advertising around our products, in primary and secondary schools (or equivalents such as high schools). This can only happen where specifically requested by, or agreed with, the

school administration for educational or sports purposes or where products offer more nutrients relative to calories, encourage desirable nutrients and ingredients (falling in Class 1 of the Ferrero Nutrition Criteria) and comply with relevant local school food standards or regulations.

We will consider donating funds or products for schools, where the school/institution has specifically requested and agreed to this support.

### Digital media and gaming

All our marketing communications made through digital media (websites, social media channels, mobile applications and other digital products) are primarily directed to parents and caregivers, adults and young people aged over 13.

We do not promote or advertise any of our products in games that are primarily targeted at children under the age of 13.

In digital media directed at an audience primarily aged under 13 such as our playful and educational app Appplaydu, we guarantee parental control and limits to screen time, whilst also ensuring the safety and quality of that screen time in terms of child development, ensuring that any content featured is completely unbranded, with no products, adverts, or in-app purchases.

### Data protection and privacy

Ferrero recognises the critical importance of protecting consumer data, particularly personal information of children, across all our digital platforms. We aim to ensure that all data collection, usage and storage practices are transparent secure and compliant with relevant privacy laws when operating online and on digital platforms.

We apply the General Data Protection Regulation (GDPR) in addition to our internal Data Protection Group Policy which sets the principles, definitions and responsibilities in how we process data on our own app Appplaydu, corporate and brand websites, social media and digital platforms.

### In-store product displays and point of sale

In-store product displays and point-of-sale (POS) promotions are generally found in environments that are primarily adult-oriented, where parents or guardians act as gatekeepers, making the final purchasing decisions. Therefore, in-store product displays and POS promotions do not fall under these principles due to the controlled nature of these environments, the active role of parental gatekeeping and the natural assumption that purchasing decision lies in the hands of adults.

### Environmental claims

At Ferrero we believe that when we make voluntary environmental claims, they should be reliable, relevant, clear, transparent, substantiated and accessible, to allow consumers to make informed purchasing decisions. Ferrero has mandatory internal guidelines to ensure that all our environmental claims are clear, substantiated and evidence-based, to avoid misleading consumers. Our internal guidelines are also based on the [ICC Framework For Responsible Environmental Marketing Communications](#) and [harmonised checklists](#), adopted in line with existing environmental codes around the world.

All Ferrero's marketing communications made through digital media are primarily directed to parents and caregivers, adults and young people aged over 13.

### Monitoring and implementation

Ferrero actively participates in external monitoring of its voluntary commitments to assess compliance levels with national, regional or global industry commitments. We work to ensure we achieve the highest possible level of compliance, and provide internal guidance and training tailored to the specific needs of different markets and regions.

The Ferrero Advertising & Marketing Principles have been implemented since January 2012. These principles are frequently updated to ensure that they maintain full consistency with our company values, keep pace with changes in applicable self-regulatory frameworks and address evolving societal concerns.

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