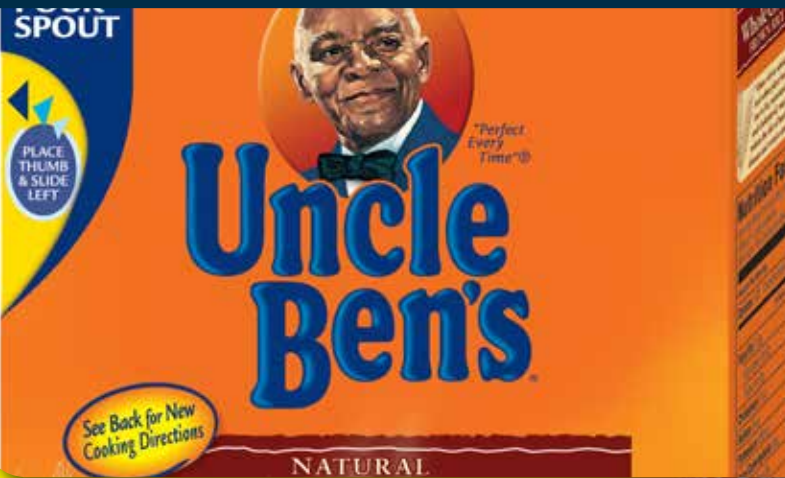


MARS

Global Marketing Code for Food, Chocolate, Confections and Gum



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A Letter from the Office of the President

In the spirit of continuous improvement, we are launching the third iteration of the Mars Marketing Code. Through the update process, we have strengthened our commitment to responsible marketing practices, and ensured that our practices reflect the continued evolution of consumer marketing. We are very proud to be a leader when it comes to setting standards of responsible marketing.

The core principles behind our Marketing Code are as follows:

- We will not market to children under 12 years because, based on the scientific evidence, we believe they cannot identify and understand the persuasive intent of advertising
- We equip gatekeepers, such as parents, with the information they need to take decisions about what is right for their children's diet
- We are transparent about our code compliance internally and externally
- We actively survey other industry players' codes and marketing behavior to ensure that we are meeting or exceeding industry standards where it matters most
- We review and update our MMC every three years, to ensure that our commitments align with developments in the external environment and that our code remains a 'living document'

The new and improved Mars Marketing Code reconfirms these core principles and expands focus beyond marketing to children, to encompass Mars' wider activities to encourage our consumers to lead healthy and active lifestyles. Specifically, the Mars Marketing Code includes a number of new commitments that position our code as the first in the industry to include commitments on:

- Providing nutritional information on front of pack
- Only developing chocolate and confectionery products whose single serving size is less than 250 kcals
- Banning the use of celebrities or licensed characters aimed at children
- Prohibiting joint promotions with alcohol and tobacco brands

Beginning in 2015, Mars will audit our compliance with the Mars Marketing Code and provide the Mars Board with a detailed annual report. We want all Mars Associates to take pride in our commitment to responsible marketing and to ensure that we are living up to the spirit and the letter of the Mars Marketing Code.



Grant F. Reid
Office of the President

Aim, Scope and Timing

Mars, Incorporated owns many of the top chocolate, confections, gum and food brands globally and has a long history of marketing its products responsibly. Our Marketing Code, first adopted in 2008 and updated in 2010 to reflect the Wrigley acquisition, reflects our corporate values and principles and our commitment to responsible marketing communications within a dynamic marketing environment.

This Code is globally applicable and seeks to reaffirm our commitment to the responsible and creative use of advertising in all its forms to market our products and to explain how Mars uses specific marketing techniques and new and emerging forms of media, consistent with our commitment to respect the privacy of our consumers. The Mars Marketing Code reflects Mars' commitment to promote and encourage healthy and active lifestyles globally. This Code applies to marketing communications for all food, chocolate, confections and gum products produced and licensed by Mars, Incorporated and Wrigley on a worldwide basis, as well as to the following promotional materials and activities generated by Mars, Incorporated: branded websites, online communities, media advertising (e.g., broadcast,

print, mobile phone and digital), advertorials, sponsorship, brand press releases and promotions. We seek to ensure that our licensees and business partners adhere to our high standards; however, Mars is not responsible for actions of non-licensed third parties that may involve our products or brands. The commitments in this Code are in addition to all statutory requirements or self-regulatory commitments applicable in any country.

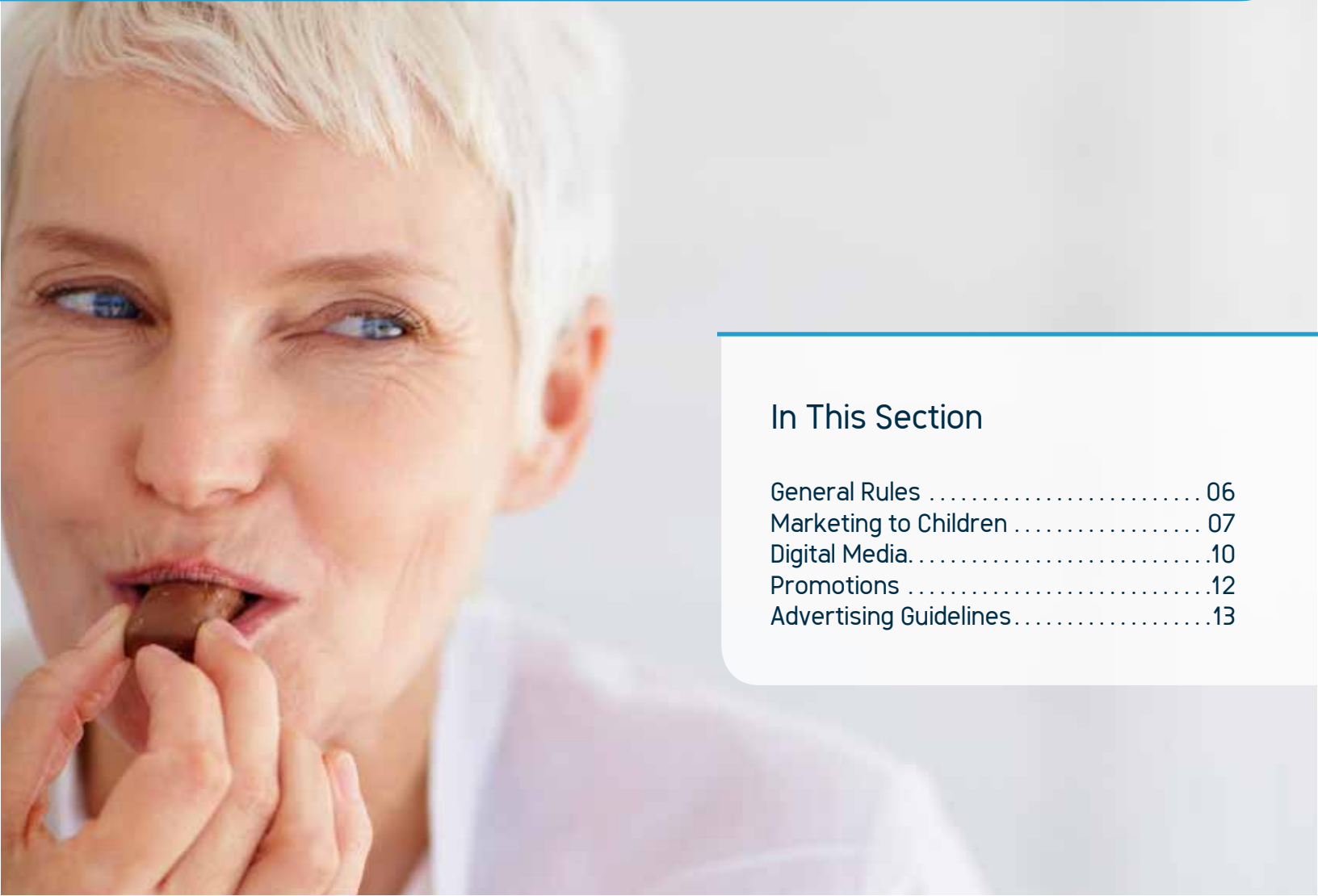
The Mars Marketing Code is a living document and may require revisions from time to time to ensure it is consistent with our corporate values and principles, as well as changes in the marketplace and changes within our Company. Our Marketing Code also includes our Advertising Guidelines, which are intended to

serve as further guidance on considerations in purchasing media time or space for our advertising from content providers.

The Mars Marketing Code is primarily for internal use and is intended to assist all our Associates (especially those involved in marketing, sales, corporate affairs or commercial/procurement) in ensuring that all our marketing practices are responsible, reflect the values and concerns of our consumers and are globally consistent. It is the responsibility of all Mars Associates and external marketing communications agencies to comply with this Code. Mars also supports and participates in various self-regulatory initiatives on food and beverage advertising around the world to help us verify that we are meeting our high standards.



Marketing Communications



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1. General Rules for Marketing Communications

Our products are of the highest quality and can form part of a healthy and enjoyable diet for consumers of all ages.

- Our communications will encourage the pursuit of a healthy, balanced diet and active lifestyle.
- Our communications will not encourage or condone excessive consumption of any food or drink.
- Our communications will not promote compulsive snacking.
- We will not represent our snack food products as substitutes for meals.
- We will provide information to consumers about the importance of healthy eating on our branded websites.
- We will provide nutritional information comprised of front-of-pack energy labels and guidelines for daily amounts of key nutrients on back-of-pack labels on all chocolate, confectionery and food products globally.
- We will not develop chocolate and confectionery products whose single portion size exceeds 250 kcal.
- We endorse initiatives to encourage active lifestyles, including the sponsoring of sports events.
- We endorse initiatives that encourage healthy eating, including healthy eating education programs.
- We will promote the oral healthcare benefits of chewing sugar-free gum.
- We will inspire families to cook together.



In regards to children:

- We will not direct marketing communications for our food, chocolate, confections and gum products primarily to children under 12, both in terms of ad content and media purchasing.
- We will direct our marketing communications to adults who make household purchasing decisions (gatekeepers) and young people 12 and over, both in terms of ad content and media purchasing.
- Our marketing communications on food, chocolate, confections and gum products of interest to children under 12 will aim to allow gatekeepers to make informed choices about whether our products are appropriate for the children in their care.
- We will not use celebrities primarily appealing to children under 12.
- Licensees must direct marketing communications in which our brands or logos appear primarily to adults, gatekeepers and consumers 12 and over.
- We will not conduct research on communications techniques with the intention of appealing to children under 12. We may conduct consumer research with minors, including children under 12, where it is necessary to understand how products can help address the public health issues of malnutrition and dental caries in positive ways. In any research with children, we will always use methodology and practices that comply with relevant guidelines and regulations to ensure safety and will secure informed consent of a parent or legal guardian in advance of any research.



Marketing to Children

As a responsible business, Mars has made the decision not to market to children under 12 years old, based on existing scientific consensus.

2. Portrayal of children under 12 years old in our marketing communications

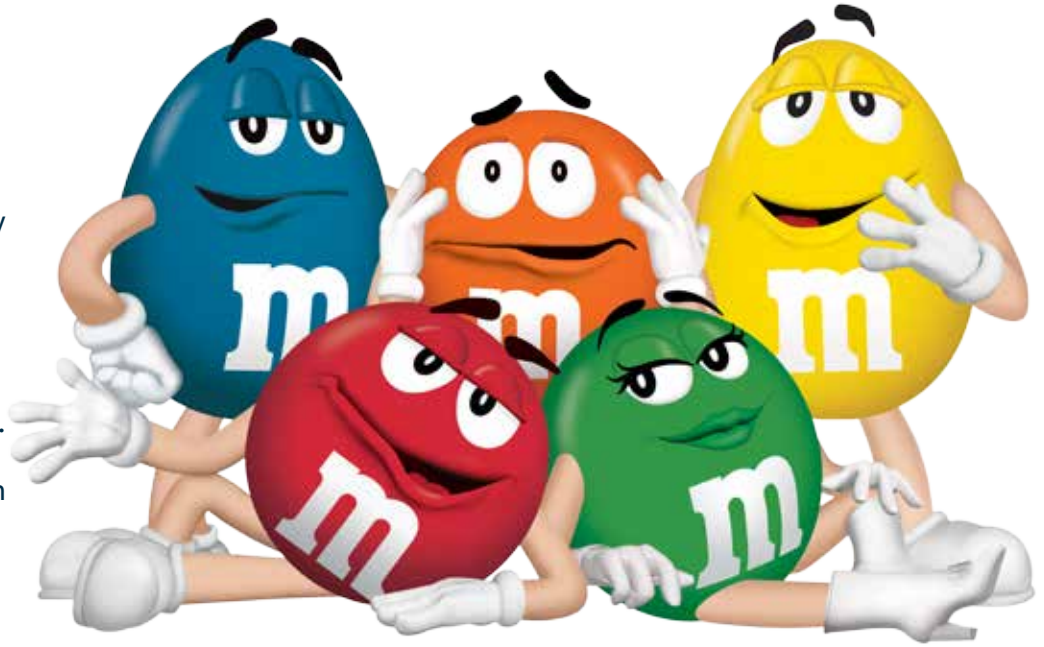
- a. We will not show children under 12 consuming our chocolate and confections products. We may show children under 12 in our marketing communications if relevant to the marketing message, e.g., depiction of a family situation or activity. In such situations, a gatekeeper must always be shown controlling access to a product.
- b. Given the oral healthcare benefits of chewing gum, we will show children chewing sugar-free gum.
- c. Given the nutritional benefits of certain foods, we will show children enjoying such foods.
- d. We will not portray children in a sedentary situation.
- e. Children under 12 shown on packs, in POS material, etc., should not appear to be acting as a spokesperson for the product.

3. Themes and events relevant to children under 12

- a. We will continue to link our products to seasonal themes and events such as Easter, Christmas, Valentine's Day, Mother's Day, Chinese New Year, Back to School, Halloween, etc.
- b. Our marketing communications around themes and events which are relevant to children will be primarily directed to gatekeepers.
- c. Other than to promote oral healthcare and family cooking, we will not use incentives and/or giveaways linked to themes and events intended solely for children under 12.
- d. We will not engage in joint promotions/partnerships linked to themes and events where our logos would be used on material intended solely for children under 12.

4. Use of celebrities and licensed characters; use of brand characters; marketing communications in films and media programming

- a. We will not use a celebrity or licensed animated character intended to appeal primarily to children under 12 in our marketing communications.
- b. In order to support oral healthcare and healthier family cooking, we may use our brand characters in gatekeeper-targeted campaigns.
- c. Our brand characters (e.g., M&M'S, Dolmio, Food Gang, etc.) are aimed at gatekeepers. We reserve the right to create new characters, but will refrain from creating characters primarily targeted at children under 12. In the case of the M&Ms characters, we will emphasize their mature personalities and adult characteristics (voices, humor, mannerisms).
- d. We will not use third-party, licensed and other characters that were primarily intended for an under-12-year-old audience in our marketing communications.
- e. Non-food promotional products for use by children under 12 depicting our characters, or licensed characters, brand names or logos that are intended to be purchased by gatekeepers, will not encourage excessive consumption of any food or drink and will not be specifically designed for use solely in primary schools.



- f. We will restrict the sale of non-food merchandise exclusively designed for use by children under 12 to Mars-controlled experiences (e.g., M&M's World, Mporium, NASCAR Trailer, etc.).
- g. When we license our brand names or logos to third parties, we will require that any non-food promotional products for children under 12 will not encourage excessive consumption of any food or drink and will not be specifically designed for use solely in schools.
- h. We will not advertise in or sponsor films or media programming where the

intended audience is primarily children under 12. For television, when the broadcasters' audience assessment at the time of the media buy indicates that more than 25% of the audience of any targeted program is composed of viewers under 12, they will be deemed to be the primary audience. For film, we will apply regional rating systems as an initial screen to define which films are rated for an audience under the age of 12.

- i. We will not undertake product placement in films or media programming where children under 12 are the primary intended audience.

5. Marketing communications in schools and community institutions, including for fundraising purposes

- a. We will not place vending machines offering our chocolate, confections, food and gum products in primary schools (Kindergarten to Grade 6 in the U.S.).
- b. In schools attended by children of all ages, we will not place vending machines in locations intended primarily for the use of primary school children.
- c. We will not offer branded materials for use in schools by children under 12, except in connection with established educational or public service messaging programs on responsible disposal of littered gum, oral healthcare and inspiring family cooking at home.
- d. We will consider donating funds or products to schools and community institutions where the school/institution has specifically requested this support in writing.
- e. We will support education and public service messaging programs that promote environmental awareness, oral care, responsible chewing gum disposal and healthy cooking habits to children and teens that may include the use of corporately branded materials in primary schools.
- f. In conjunction with government health authorities and/or recognized organizations, we will create branded educational



programs, including sampling, to promote oral care and responsible chewing gum disposal to children under 12 and teens. Prior to deploying these programs, we will require school administration approval.

- g. In conjunction with recognized external experts, we will create branded educational programs to promote healthy cooking and eating habits to children under 12 and teens. Prior to deploying these programs, we will require school administration approval.
- h. We will not sponsor sports events in primary schools.

With the exception of established educational or public service programs, Mars will not offer branded educational materials or vending in primary schools.

6. Digital Media

Marketing communications made through websites, mobile applications and other digital products and services (collectively, “Digital Media”) will be directed to adults and teens (age 13 and older) and *not* directed to children under age 13.

Examples of marketing communications in Digital Media are: online games offered on our websites; digital advertising and other branded content made available on third-party websites and social networks; branded mobile applications; and text messaging (SMS/MMS) campaigns. Mars will direct all marketing communications in Digital Media to teenagers (age 13 or older), instead of children age 12 and older, consistent with the requirements of the U.S. law known as the Children’s Online Privacy Protection Act (“COPPA”).



- a. We will advise consumers who visit our brand and corporate websites and use our mobile applications about Mars’ policies. We will include a link to the “Note to Parents,” Mars Privacy Statement, Terms of Use, Interest-Based Advertising Policy, Web Site Owner Information and Mars Copyright Notice, as well as a “Contact Us” link in the footer of all websites and mobile applications owned and operated by Mars and in branded social media content whenever possible.
- b. Marketing communications promoting Mars’ food, chocolate, confections and gum brands in other Digital Media (e.g., social networks) will, whenever possible, include links to information about nutrition and healthy lifestyle choices and, if Mars is collecting personal information from consumers, a link to the Mars Privacy Statement.
- c. We will use “neutral age screening” (as defined in COPPA) to ensure that we have taken all reasonable steps to restrict children under age 13 from submitting their personal information to Mars through Digital Media, as well as to restrict their ability to download branded content, post material potentially appealing to younger audiences or upload photographs or information.
- d. Each Mars-branded website or mobile application will provide notice to users of its commercial marketing intent.
- e. For promotions executed on Digital Media, we will not require consumers to purchase Mars products in order to access special rewards, such as games or product-related merchandise.

- f. We subscribe to the WOMMA (Word of Mouth Marketing Association) Code of Ethics (available at <http://womma.org/ethics>). Mars will use blogs, microblogs (e.g., Twitter), social networks (e.g., Facebook), photo-sharing and video-sharing sites (e.g., Instagram, Vine, YouTube) and other Digital Media to earn or promote customer recommendations only from adult and teenage consumers and only in an open and respectful manner.
- g. Mars seeks to partner with social media platforms and services that offer age screening (e.g., Facebook by using a Facebook app). If a social media platform or service does not permit age screening, Mars seeks to use other mechanisms, such as parental controls or notices, in an effort to ensure that marketing communications in Digital Media are primarily directed to teenagers (age 13 and older). If audience demographic information is available, Digital Media purchases will adhere to our commitment that the audience of children under age 13 must be 25% or less of the total projected audience composition.
- h. Mars occasionally offers consumers the opportunity to post user-generated content (UGC), such as their own photographs, videos or reviews of Mars products. Mars will limit opportunities to submit UGC to adults or, in carefully controlled situations, to teens. Whenever possible, we will use neutral age screening to prevent children under age 13 from posting UGC. Prior to submitting UGC, all consumers will be required to affirmatively agree (click to agree or opt in) to submission terms.



Mars takes all reasonable steps to restrict children under age 13 from submitting personal information to us through Mars Digital Media platforms, including age-gating our websites, and we partner with social media platforms to promote age screening and parental controls.

7. Promotions

We take great care to ensure that all of our own promotional activities comply with this Code, and we encourage our retail customers and promotional partners to respect and adhere to it when promoting our products.

There may be circumstances, however, where retail customers and others use our products in promotional activities in which we are not involved and over which we have no control.

- a. We will not design or participate in promotions intended primarily for children under 12.
- b. We will not design joint promotions with manufacturers of third-party products intended primarily for children under 12.
- c. Third-party products used in joint promotions should be appropriate for the same consumers as the Mars products offered.
- d. We will not promote activities, recipes or games that encourage excessive consumption, including “supersize” offerings.
- e. We will not design or participate in promotions of our products with alcoholic brands (as of 2015).
- f. We will not design or participate in promotions of our products with tobacco brands.
- g. For promotions involving a third-party product intended for consumption by one individual, we will include only standard-size products or products intended for sharing.
- h. Whenever we undertake a promotion involving a brand owned by another company, we will ensure that the third-party brand is consistent with the Marketing Code. For example, licensed character promotions may be acceptable in gatekeeper-directed venues or situations.
 - i. We may engage in partnerships with Disney for products in carefully controlled, gatekeeper-directed retail areas in Disney parks.
 - j. Text and Internet promotions will only be open to participants 13 and over. We will either use neutral age screening, rely on age screening or parental controls of business partners (like mobile telecommunications service providers) or adopt other mechanisms, such as notices, consistent with recommended industry practice, in venues like Twitter and blogs. In those venues we will also review audience demographic information to verify that the audience of children under 12 is 25% or less of the total.



8. Mars, Incorporated Advertising Guidelines

Mars, Incorporated is committed to advertising its products in a manner consistent with the principles that guide us in all aspects of our business. The media environment is becoming more and more complex, with more choices of content than ever before for consumers. Our goal in our advertising is to identify media vehicles that allow us to reach our intended audiences, in accordance with our Marketing Code and these guidelines.

The responsibility for programming or media content does not and should not lie with the advertiser. It is not and should not be the advertiser's role to dictate content standards or to exercise editorial control. However, it is the advertiser's right to make judgments about the suitability and appropriateness of programming or media content as an advertising vehicle for our products.

Consequently, as a general rule, advertising for our products should not depict or be placed in programs or media involving:

- a. Ethnic, racial, religious or sexual stereotyping or ridicule.
- b. Depictions of gratuitous or excessive violence, brutality, cruelty or suffering to people or animals.
- c. Explicit sexual behavior or inappropriate sexual suggestiveness or innuendo.
- d. Endorsement of unethical, self-destructive or antisocial behavior or values, e.g., drug or alcohol abuse.
- e. Endorsement of excessive or compulsive consumption of foods or beverages.
- f. Situations antithetical to the Five Principles of Mars, Incorporated, or to basic common sense.

We recognize that content with a historical, social, humorous or satirical nature may touch on provocative themes but may



The Five Principles

Quality Responsibility Mutuality Efficiency Freedom

nevertheless be an appropriate vehicle for our advertising. The handling of controversial subjects calls for particular sensitivity and consideration. When serious treatment of controversial subjects is handled properly, in a factually accurate, fair and balanced manner, the media can perform a constructive societal role which should be encouraged.

Advertising should not be scheduled during programs or media in which the handling of controversial subjects becomes inflammatory, unbalanced or not factual, which depends on the exploitation of private grief or misfortune, or which is inconsistent with the core values of our Company and our brands.

Mars respects the privacy rights of all of our consumers. We seek to embed respect for privacy into all aspects of our marketing initiatives and to consider and address privacy issues at every stage of the marketing lifecycle.



9. Privacy



All Associates who deal with consumer personal data are expected to be familiar with Mars' online Privacy Statement, Global Digital Marketing Standards and local Digital Marketing Guidelines where applicable, as well as relevant local laws and requirements regarding the collection and use of personal information and data security obligations.

- a. All websites, mobile applications and other Digital Media owned and operated by Mars will prominently display the Mars Privacy Statement. We encourage visitors to thoroughly review the Mars Privacy Statement, Terms of Use and other special terms and rules that may apply to activities in Digital Media.
- b. When personal information is collected for a single, one-off purpose (e.g., entering an email address to “share with a friend”), we will be transparent about immediate deletion of this information.
- c. We will not share personal information with outside third parties except as described in the Mars Privacy Statement.
- d. We will honor any specific commitments we make to consumers about how and how frequently we will contact them and promptly honor opt-out requests according to local laws governing unsolicited commercial communications.
- e. We adopt reasonable data security procedures suitable to the sensitivity of personal information about consumers that we hold, and require our agents and service providers to do the same.



Mars strives to comply with existing legislation and applicable self-regulatory codes in its marketing communications in each market.



10. Governance



The Marketing Code provisions are to be applied in addition to laws and regional or sectorial codes. Mars provides interactive training on the Mars Marketing Code to empower Associates and external marketing communications agencies to fully understand and apply the Code's rules. The training is mandatory for Mars Marketing Associates, and all participants receive, after successful completion of the training test, a "Mars Marketing Code Driving License."

External third-party monitoring of Mars, Incorporated's voluntary commitments to assess compliance levels with national, regional or global industry pledge commitments takes place within the framework of the International Food and Beverage Alliance, the Children's Food and Beverage Advertising Initiative (CFBAI) of the Better Business Bureau, the EU Pledge and the World Federation of Advertisers. We will share data related to levels of our compliance publicly.

Mars, Incorporated conducts a yearly internal compliance audit, including reporting to and oversight by the Global Mars Board.