



# RESPONSIBLE MARKETING GUIDELINES

## 2022

These are global guidelines, applicable to Saputo marketing communications in every division in which it operates. The guidelines are designed to align with global marketing standards;<sup>1</sup> accordingly, it will be reviewed and updated on a continual basis to ensure it reflects the ever-evolving food environment.

In addition to these guidelines, all Saputo marketing communications must comply with applicable laws, rules and regulations in any jurisdiction (“Legislation”) where Saputo carries out commercial activities. In the event these guidelines conflict with (i.e., is less stringent than) any Legislation, the latter shall prevail.

### Definition of marketing communications

The term “marketing communications” includes, without limitation, advertising and packaging materials, sponsorships, contests, websites and direct marketing and promotional materials. It should be interpreted broadly to mean any communications, materials or documentation, in any form, intended to promote products, organizations or companies or to influence consumer behaviour – whether written, printed, online, audio or visual.

## General principles

The following principles apply to all Saputo marketing practices, regardless of consumer age.

- All Saputo marketing communications will be legal, decent, honest, and truthful.
- All Saputo marketing communications will be prepared with a sense of social and professional responsibility.
- Saputo marketing communications will adhere to the principles of fair competition.
- No Saputo marketing communications will impair public confidence in marketing.
- Saputo marketing communications will not be framed to abuse the trust of consumers or exploit their lack of experience or knowledge.
- Saputo marketing communications will not be misleading or deceitful so as to influence consumer choices, including with respect to the nature, composition, method of manufacture, performance or nutritional value, origin of the product, health or other benefits from consuming the product.
- All Saputo descriptions, claims or illustrations relating to verifiable facts will be capable of substantiation.<sup>2</sup>
- Saputo marketing communications will not misuse technical data or exaggerate the validity of product claims.
- Saputo marketing communications will not, without justification on educational or social grounds, contain any visual portrayal or any description of potentially dangerous practices, or situations which show disregard for safety or health, as defined by local national standards.
- Saputo marketing communications will not undermine the promotion of healthy balanced diets, or the importance of a healthy and active lifestyle.
- Saputo marketing communications will not encourage or condone excess consumption and portion sizes will be appropriate to the setting portrayed.
- Food products not intended to be substitutes for meals will not be represented as such.

1. These guidelines have been developed based on the review of various sources, including the latest version of the International Chamber of Commerce Framework for Responsible Food and Beverage Marketing Communications, regional industry pledges, government regulations, and more.

2. Nutrition and health claims will be in compliance with applicable country regulations and laws or international standards (e.g., Codex Alimentarius), if no local regulations or laws exist.



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## Marketing to children

Saputo is driven by a commitment to support nutrition and healthy living. This is particularly important for our youngest consumers, as lifelong healthy eating habits are established during childhood. Saputo will apply the following guidelines to ensure the responsible marketing of food and beverages to children under the age of 15, when permitted by applicable Legislation.<sup>3</sup>

### Product requirements

Saputo will only market foods and beverages to children under the age of 15 years if they meet Saputo Nutrient Profiling Model Level 1 criteria. In addition, Saputo will not advertise the following products to children, regardless of nutritional content.<sup>4</sup>

- Butter
- Cream
- Ice cream

### Definition & scope

The requirements set forth in this Section apply to all paid and unpaid marketing communications developed by, or on behalf of, Saputo with the intention to promote products to children under the age of 15. Marketing communications are considered directed at children when at least 30% of the media audience is under the age of 15. This applies to any type of advertising and communications, including, without limitation: television, radio, print, cinema (including DVDs), mobile media (e.g., SMS and mobile application marketing), internet/digital media (Saputo-owned social media, Saputo-owned websites, ads on third-party websites), video and computer games, schools and childcare centers, product sponsorships, and outdoor marketing (e.g., billboards).

This also applies to the use of marketing elements seen as attractive to children on packaging, at the point-of-sale or within platforms directed to children. This includes the use of owned or licensed characters, celebrities, influencers<sup>5</sup>, movie tie-ins or premiums (e.g., toys) that primarily appeal to children under the age of 15.

### Additional principles

- Saputo marketing communications directed to children will not undermine positive social behaviour, lifestyles and attitudes.
- Saputo marketing communications directed to children will not be used in media where the editorial matter is unsuitable for them.
- Saputo marketing communications directed to children will not exploit the inexperience or credulity of children.
- Saputo marketing communications directed to children will not exaggerate the nature, characteristics or performance of a product.
- Saputo marketing communications directed to children will not create a sense of urgency, or inappropriate price minimization.
- While fantasy, including animation, can be appropriate in marketing communications with children, care will be taken not to exploit the imagination of children in a way that could mislead them about the nutritional benefits of the product being advertised.

3. Certain jurisdictions, such as Quebec (for children under the age of 13), prohibit advertising to children, subject to a limited number of exceptions.

4. The exclusion of these products is aligned with current marketing to children policies, such as the EU Pledge.

5. Includes influencers under the age of 15, or influencers with a primary audience of under 15 years of age.



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- Saputo will not use media personalities (live or animated) to sell products in a way that obscures the distinction between a children’s program/editorial content and commercial promotion. For example, commercials or advertisements featuring characters will not be aired adjacent to children’s programs/articles in which the same personality or character appears.
- Saputo marketing communications directed to children will not contain any statement or visual treatment that could have the effect of harming children or young people mentally, morally or physically. Children and teens will not be portrayed in unsafe situations.
- Saputo marketing communications directed to children will not create the impression that consuming the advertised product will give them physical, psychological or social advantages over other children, such as status or popularity with peers, success in school or sports, or intelligence, or that not consuming the product will have the opposite effect.
- Saputo marketing communications directed to children will not undermine the role of parents and other adults responsible for a child’s welfare in guiding diet and lifestyle choices.
- Saputo marketing communications directed to children will not include any direct appeal to children to persuade their parents or other adults to buy advertised products for them.
- Saputo will comply with all applicable data collection laws and regulations to protect children’s privacy.

## Monitoring

All Saputo marketing staff will receive training on these guidelines, and compliance will be monitored on a regular basis. Any non-compliance with these guidelines needs to be reviewed by the divisional President and COO.

## APPENDIX

### Saputo Nutrient Profiling Model: Level 1 Criteria

	Milk	Yogurt	Hard Cheese	Soft Cheese	Snack/Mini Meal
<b>Calories</b> (kcal per serving)	≤ 160	≤ 150	≤ 100	≤ 100	≤ 150
<b>Saturated Fat</b> (g per 100 g/mL)	≤ 1	≤ 1	≤ 12	≤ 9	≤ 5
<b>Total Sugar</b> (g per 100 g/mL)	≤ 6*	≤ 7*	≤ 3*	≤ 6*	≤ 4.5*
<b>Added Sugar</b> (g per 100 g/mL)	≤ 2	≤ 2	≤ 0	≤ 0	≤ 4
<b>Sodium</b> (mg per 100 g/mL)	≤ 80	≤ 100	≤ 750	≤ 600	≤ 300
<b>Protein</b> (g per 100 g/mL)	≥ 3	≥ 3	≥ 20	≥ 10	≥ 4
<b>Calcium</b> (mg per 100 g/mL)	≥ 110	≥ 100	≥ 600	≥ 400	≥ 110
<b>Vitamin D</b> (mg per 100 g/mL)	Encouraged to provide “source” level**				

\* Used as a voluntary guardrail only

\*\* Based on local claims