



Fazer Group Marketing Policy

Introduction

The purpose of this policy is to define the basic principles for marketing communications throughout Fazer Group.

This policy applies to all marketing activities and communications including e.g. the following forms of advertising and marketing: television, radio, online and direct marketing, shopper marketing, packaging, events, trade/sales and other professional promotions and communications.

This policy follows the framework guidelines set by the International Chamber of Commerce (ICC) for Responsible Food and Beverage Marketing communication, as well as marketing communications principles issued by local self-regulatory organizations (such as ETL and national advertisers association).

All marketing and communications must in addition to this Policy at all times comply with the relevant local laws and regulations.

Fazer commits to comply with the following principles in all marketing communications

1. All advertising and communications must be truthful and shall not include misleading facts or statements.
2. Copy, sound and visual presentations of food products represent accurately the material characteristics advertised.
3. Nutrition and health benefit claims must have a sound scientific basis.
4. Marketing communications and promotions will not encourage to excess consumption and portion sizes are appropriate to the setting portrayed. In addition, we strive to inform consumers, in the way of presented context or otherwise, about the purposes of different package sizes.
5. Marketing communications will not undermine the promotion of healthy, balanced diet or the importance of healthy and active lifestyle.
6. We demonstrate a reasonable variety of foods reflecting a balanced diet when products are presented in the context of a meal.
7. Food products not intended to be substitutes for meals must not be represented as such.



All marketing communications directed to children (under the age of 18 years) are furthermore subject to the following principles:

8. Marketing communications must not exploit inexperience or credulity, of children and young people.
9. Marketing communications must not mislead children or young people about the potential health benefits or other benefits, such as popularity or sports success, from the consumption of the advertised product.
10. The role of the parents and other adults responsible for a child's welfare must not be undermined.
11. Marketing communications must not create a sense of urgency.
12. When using personalities (live or animated) which might be appealing to children, a special care must be taken not to exploit a child's imagination in a way that could mislead him/her about the benefits of the food product or encourage poor dietary habits.
13. When using personalities, live or animated, advertising content must be clearly distinguished from the programme or editorial content.
14. We refrain from communications related to unhealthy products in schools or day cares except where specifically requested by or agreed with the school administration.
15. If marketing communications can be considered to be directed to children under the age of 15 years, a specific process must be followed. This process includes a check with Group Legal and Group Head of Branding.

Governance of the marketing communications policy

Fazer Group's Head of Branding is responsible for reviewing the compliance with the Marketing Policy on an annual basis. Any non-compliance with this policy will be brought to the attention of the Communications and Branding Management team who will decide on the further actions and whether the matter should be taken to the Group Management team. Business area heads are responsible for forming and following practices, instructions and operating models in line with the marketing policy. The responsibility for the daily operations in marketing lies with the Heads of Marketing in the businesses. The Group Brand preparation team reviews and updates the marketing policy related guidelines.