



THE RESPONSIBLE CHILDREN'S MARKETING INITIATIVE COMPANY ACTION PLAN

COMPANY NAME:

George Weston Foods Limited (GWF)
AB Food and Beverages Australia Pty Ltd (AB F & B)

DESCRIPTION OF CORE BUSINESS:

GWF is one of Australia and New Zealand's largest food manufacturers, employing around 9,000 employees in close to 60 sites.

GWF is one of Australia's largest millers and wholesalers of grain and is the largest manufacturer of smallgoods in Australia.

The most well-known brands produced by GWF include, but are not limited to: Tip Top®, Don®, KR Castlemaine™, Sunblest™, Golden™, Top Taste™, Bazaar® Breads of the World™, Bürgen® and Noble Rise®. In fact, Tip Top® is one of the leading food brands in Australia - we produce around one million units of fresh baked product every day.

AB Food and Beverages Pty Ltd are a leading hot beverages company operating as the Australian arm of the International Beverages Division of Associated British Foods. Associated British Foods plc (ABF) is one of Europe's largest food companies with a wide range of successful brands and products

The most well-known brands produced and marketed by AB Food and Beverages Australia Pty Ltd are Twinings™, Jarrah® and Ovaltine®.

STATEMENT OF COMPANY COMMITMENT:

At GWF, we are about really, really good food, made by really, really good people for everyone, everyday. We aim to meet the needs of our consumer, by being close to them. We innovate our brands guided by understanding our consumer's needs.

We are committed to providing a range of quality products that contribute positively towards a healthy and balanced diet for all Australians. As part of this commitment, GWF practices responsible marketing of food to children.

GWF and AB F & B are signatories to the Australian Food and Grocery Council's (AFGC) *Responsible Children's Marketing Initiative* – developed in collaboration with the Australian Association of National Advertisers (AANA). The initiative aims to maintain a high level of social responsibility in marketing communication for food and beverage products in Australia.

In addition to complying with the *Responsible Children's Marketing Initiative*'s core principles, GWF adheres to the following AANA codes:

- *The AANA Code for Advertising and Marketing Communications to Children*
- *The AANA Food and Beverages Advertising and Marketing Communications Code*
- *The AANA Code of Ethics*

CORE PRINCIPLES:

At GWF, we believe that enjoying a wide variety of nutritious foods as part of a healthy lifestyle is the cornerstone of personal health and wellness. We recognise that foods are playing an increasingly important role in people's lives, including their personal wellness, nutrition and enjoyment.

GWF and AB F & B are committed to providing a range of quality products that contribute positively towards a healthy and balanced diet for all Australians, including children.

To attain personal wellness, we believe that consumers should proactively manage their health and overall wellbeing by making informed food choices to help maximise their quality of life.

We engage in a range of marketing and communication activities and are committed to providing accurate information to our consumers to assist them in making informed food choices.

As part of this commitment, we practice responsible marketing of food to children.

In our marketing and communication activities we adhere to the following basic principles – we will:

- work to ensure that nutritional claims made on packaging and in the promotion of foods are factual, truthful and where appropriate, relevant to their role in the total diet;
- encourage healthy dietary habits and physical activity through a range of product options;
- provide community comment through realistic role models and informed spokespeople; and
- ensure clear product labelling through the Daily Intake Guide to highlight a product's nutritional content.

Specifically for advertising to children, we will:

- not target children younger than six;
- Take account of the relative sophistication of the audiences, especially audiences between the ages of six and 11;
- Show children in safe physical and social environments;

- Illustrate age-appropriate safe product preparation, heating and food-handling methods;
- Showcase good eating habits and an active lifestyle;
- Use age-appropriate language; and
- Advertise only those products with appropriate nutrition profiles.

We have a Marketing and Communications approval process in place to ensure all our materials comply with relevant regulations, Codes of Practice and Guidelines. The approval process involves:

- Marketing
- Nutrition
- Consumer Affairs
- Regulatory Affairs

All advertising creatives and marketing communication activities, including, those for products to be marketed directly to children under 12, are reviewed through this process.

Advertising Messaging

We will not advertise any of our products directly to children under 12 unless they represent healthy dietary choices, consistent with established scientific or Australian government standards.

The advertising and/or marketing communication activities will reference or be presented in the context of, a healthy lifestyle, designed to encourage good dietary habits and physical activity.

Use of popular personalities and licensed characters

We will not use Popular Personalities or Licensed characters in advertising primarily directed to children under 12 unless such advertising represents healthy dietary choices, consistent with established scientific or Australian government standards. GWF will also ensure compliance with the specific requirements of the Children's Television Standards (CTS) in relation promotions and endorsement by Program Characters (CTS section 22).

Product placement

We will not pay for or actively seek to place our products in the program/editorial content of any medium primarily directed to children under 12 for the purpose of promoting the sale of those products unless they represent healthy dietary choices, consistent with established scientific or Australian government standards.

Use of products in interactive games

We commit that, in any interactive game primarily directed to children under 12 where our products are incorporated into the game, the interactive game must incorporate or represent healthy dietary choices, consistent with established scientific or Australian government standards.

Advertising in schools

We will refrain from product-related communications in primary schools, except where specifically requested by, or agreed with, the school administration for educational or informational purposes, or related to healthy lifestyle activities under the supervision of the school administration or appropriate adults.

Use of premium offers

We will not advertise premium offers unless the reference to the premium is merely incidental to product being advertised in accordance with the AANA codes and in the Children's Television Standards (CTS Section 20).

SCIENTIFIC OR GOVERNMENT STANDARDS:

In determining which of our products are considered acceptable for advertising to children under 12, we have used the following established scientific or Australian government standards to determine that those products represent a healthy dietary choice:

NSW School Canteen Association Healthy Kids Nutrient Criteria

MEDIA

We will abide by the following Codes:

- The AANA Code for Advertising & Marketing Communications to Children
- The AANA Food & Beverages Advertising & Marketing Communications Code
- The AANA Code of Ethics

COMPLIANCE AND COMPLAINTS

We agree to abide by any decision or ruling made by the appointed arbiter in relation to the execution of this plan.

REPORTING

We will provide a report of our marketing activity against this plan on an annual basis to the AFGC, with the first plan due by 31 January 2010.