The Responsible Children's Marketing Initiative Company Action Plan

Company Name

Simplot Australia Pty Ltd (Simplot)

Description of Core Business

Manufacturer and marketer of foods to the Retail and Foodservice markets, under the Ally, Birds Eye, Chiko, Edgell, Harvest, I&J, John West, Lean Cuisine, Leggo's, Quorn and Seakist brands.

Statement of Company Commitment

Australian consumers know and trust our brands to deliver consistent quality and value for money. Simplot do this by constantly searching for new and innovative food products which will delight our customers. With increasing focus on health and wellbeing Simplot provides nutrition information on pack, in advertising and through our websites. Simplot promotes ethical conduct in the advertising and promotion of our products.

Simplot makes a determined effort to advertise in a responsible way, not misleading consumers regarding the benefits of a product and not encouraging dangerous or irresponsible consumption. Simplot also monitors to ensure that our advertising does not contain objectionable content and does not depict discriminating or offensive attitudes to religious, political, ethnic, cultural or social groups.

Simplot complies with the AANA Code of Conduct for Advertising to Children.

The Simplot Integrated Approach to Kids

The Simplot Integrated Approach to Kids is based on 3 guiding principles:

Nutrition:	Simplot believes that what children eat now will not only influence their growth and development now, but also their health in the future. Simplot employs a team of nutritionists and dieticians who advise on the ideal nutrient content for children.
Designed for Kids:	Simplot believes in providing meals (and meal components) that are created

- specifically for kids and ensure parents can identify them quickly and easily.
- **Convenience:** Simplot supports parents in their role and help them by providing food that is quick to buy, prepare and eat.

Core Principles

In addition to the Company Commitment outlined above, Simplot commits to meeting each of the core principles outlined in the Responsible Children's Marketing Initiative.

1. Advertising Messaging

Simplot will not advertise food and beverage products to children under 12 unless:

- 1. those products represent healthy dietary choices, consistent with established scientific or Australian government standards.
- 2. the advertising and/or marketing communication activities reference, or are in the context of, a healthy lifestyle, designed to appeal to the intended audience through messaging that encourages:
 - good dietary habits, consistent with established scientific or government criteria
 - physical activity.

2. Use of popular personalities and characters

Simplot will not use Popular Personalities, program characters or Licensed characters' in advertising primarily directed to children under 12 unless such advertising complies with the messaging options set out above. This is in addition to requirements under the Children's Television Standards 2009 covering C and P periods (CTS Section 35).

3. Product Placement

Simplot will not seek nor pay for messaging in programming primarily designed for children under 12, unless those products are consistent with good dietary habits and the context of the messaging encourages a healthy lifestyle.

4. Use of products in Interactive Games

Simplot is committed to ensuring that in any interactive game primarily directed to children under 12 where Simplot's food or beverage products are incorporated into the game, the interactive game will be consistent with the healthy dietary choices under #1 above and healthy messaging under #2 above.

5. Advertising in Schools

Simplot 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.

6. Use of Premium Offers

Simplot is committed to refraining from advertising premium offers unless the reference to the premium is merely incidental to the product being advertised in accordance with the AANA code the Children's Television Standards 2009 (CTS section 33).

Scientific Criteria and Guidelines

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

National Health School Canteen Guidelines

Media

This initiative applies to television, radio, print, cinema and third-party internet sites where the audience is predominantly children and/or the programs or media are directed primarily to children. Our aim is to help children (and their parents) make healthier and more informed choices.

Compliance and Complaints

Simplot will ensure its staff and agencies are aware of and trained in the application of this initiative. Simplot agree to abide by any decision or ruling made by the Advertising Standards Board.

Reporting

Simplot will provide an overall report of our marketing activity and communication against this plan on an annual basis; due by the end of February each year.