



# *WK Marketing and Communication Guidelines*

Our founder, W.K. Kellogg set the tone for our continued commitment to protecting and promoting consumer confidence when he put a name on every product as a personal assurance of quality. We continue to be committed to responsibly marketing and communicating the intrinsic quality of our brands so that our consumers can make informed choices.

These guidelines are the basis for our consumer communications, ensuring that we have uniform standards of marketing and communication wherever we market our products.

## *Table of Contents*

<i>Overview</i> .....	2
<i>Communication to All Consumers</i> .....	2
Brand Safety: Placement of Advertising Content .....	3
Digital .....	5
Gaming and Streaming .....	6
<i>Marketing to Children Commitment</i> .....	7
What We Market to Kids – Nutrition Criteria .....	7
How We Market to Kids – Marketing Criteria .....	8
Marketing to Kids in Schools .....	9
Use of Licensed Properties Directed to Children .....	9
Age Restrictions for Sponsorships, Promotions, and Non-School Events .....	10
<i>Compliance and Monitoring</i> .....	10

# WK Marketing and Communication Guidelines



## *Overview*

Our founder, W.K. Kellogg set the tone for our continued commitment to protecting and promoting consumer confidence when he put his name on every product as a personal assurance of quality. We continue to be committed to responsibly marketing and communicating the intrinsic quality of our brands so that our consumers can make informed choices.

These guidelines are the basis for our consumer communications, ensuring that we have uniform standards of marketing and communication wherever we market our products. They apply to all forms of marketing and advertising, including but not limited to the following.

- television
- radio
- print
- digital media
- social media
- in-store marketing and signage
- on-packaging messaging
- cinema
- mobile and SMS marketing
- gaming
- events
- sponsorships
- product placement
- contracted influencers

We understand that consumer values and customs may vary from country to country, but the basic principles offered here provide sound guidance for all WK Kellogg Co (“WKKC”) marketing and consumer communication, no matter where our consumers live.

These guidelines will supplement, not replace, our existing obligations under local regulations or self-regulatory programs in which WKKC participates. These guidelines are also supplemented by the WKKC IP Brand and Character Guidelines, the WKKC [Code of Ethics](#), and the WKKC Social Media Marketing Guidebook.

## *Communication to All Consumers*

- Our communications will embrace the diversity of our consumer base and will not undermine human dignity by incorporating stereotypes, belittling or

# WK Marketing and Communication Guidelines

disparaging any group or person based on social, racial, ethnic, religious, gender, age, sexual orientation or physical traits.

- We will not engage in political debate (e.g., political parties, party platforms, partisan policy issues, etc.) in our advertising content or placement. We can provide general information about civic participation (e.g., get out the vote or voter information).
- Our communications will not intentionally exploit the misfortunes of others, display vulgarity, bad manners or offensive behavior or language.
- Our communications will not portray adults or children in situations or engaged in acts harmful to themselves or harmful to the public good or to others or include violence or sexual activity.
- Our communications will present products in a context that supports the Company’s approach to the sustainable business strategy of Feeding Happiness and our commitment to helping people be Happier, Healthier, Together.
- Our communications will provide helpful information to assist consumers of all ages in choosing healthy diets and active lifestyles, consistent with our Feeding Happiness strategy.
- Our communications will be consistent with our IP Brand Matters Agreement with Kellanova and with the Core and Extended requirements for our brands located in our IP Brand and Character Guideline documents: [WK IP Brand & Character Guidelines](#).

## **Brand Safety - Placement of Advertising Content**

WKCC is a family-friendly advertiser. Schedules and placements should be monitored to keep WKCC advertising out of any programming and content based on the following independent WKCC Brand Safety Guidelines:

<b>Category of Content (Incl. Audio/Visual/Text)</b>	<b>Brand Safety – Placement to be Avoided</b>
<b>Adult &amp; Explicit Content</b>	Illegal sale, distribution, and consumption of child sexual abuse materials; explicit or gratuitous depiction of sexual acts, and/or display of genitals or intimate body parts, whether real or animated/illustrated or AI generated
<b>Arms/Weapons, and Ammunition</b>	Promotion and advocacy of illegal arms, weapons, rifles, and handguns; Instructive content on how to obtain, make, distribute, or use illegal arms; Glamorization of illegal arms; Use of illegal arms in unregulated environments

# WK Marketing and Communication Guidelines

<b>Crime &amp; Harmful Acts to Individuals or Society/Human Rights Violations</b>	<p>Graphic promotion, advocacy, and depiction of willful harm and actual unlawful criminal activity (e.g., animal cruelty, self-harm, etc...); Explicit violations/demeaning offenses of Human Rights (e.g., human trafficking, slavery, etc...); Targeted harassment of individuals and groups</p>
<b>Death, Injury, Military Conflict</b>	<p>Promotion or advocacy of Death or Injury; Murder or Willful bodily harm to others; Graphic depictions of willful harm to others; Incendiary content provoking, enticing, or evoking military aggression; Live action footage/photos of military actions, genocide, or other war crimes</p>
<b>Hate Speech &amp; Acts of Aggression</b>	<p>Content that denigrates any race, nationality, religious affiliation, gender/self-defined gender identity, physical or mental ability; Unlawful acts of aggression based on race, nationality, ethnicity, religious affiliation, beliefs, or practice, gender or gender expression, and sexual orientation; Behavior or commentary that incites such hateful acts, including bullying</p>
<b>Terrorism</b>	<p>Promotion and advocacy of graphic terrorist activity involving defamation, physical and/or emotional harm of individuals, communities, or societies</p>
<b>Obscenity &amp; Profanity</b>	<p>Excessive use of profane language or gestures and other repulsive or explicitly gory actions with the intent to shock, offend, or insult</p>
<b>Illegal Drugs, Tobacco, E-Cigarettes, Vaping, and Alcohol</b>	<p>Promotion or sale of illegal drug use – including abuse of prescription drugs. Federal jurisdiction applies, but allowable where legal local jurisdiction can be effectively managed; Promotion and advocacy of tobacco, e-cigarettes, vapes, and alcohol use to minors</p>
<b>Unhealthy Eating Practices</b>	<p>Excessive food consumption; Content that supports or glamorizes disordered eating</p>
<b>Debated Sensitive Social Issues</b>	<p>Insensitive, irresponsible and harmful treatment of debated social issues and related acts intended to demean a particular group or incite greater conflict</p>

# WK Marketing and Communication Guidelines

<b>News Placement</b>	Programming that is focused on News unless screened and approved by WKKC Media Working Group. <sup>1</sup>
<b>Partisan Political Messaging</b>	Uses harmful or hateful speech to denigrate – or forcibly supports or advocates for – any political party, political perspective or its members
<b>Online Piracy, Spam or Malicious Content</b>	Pirating, copyright infringement, and counterfeiting; Malware; Phishing

## Digital

- Digital content encompasses communications on company owned and operated websites or digital content, syndicated content provided by the company to other sites, digital ad placement, and both owned and sponsored social media content.
- Sponsored content will:
  - Clearly identify the sponsoring company or brand;
  - Clearly differentiate advertising from other content in digital media according to applicable regulatory guidance;
  - Follow the applicable federal, state, provincial and local laws and regulations pertaining to social media disclosure guidelines. For example, in the United States, we will abide by the US Federal Trade Commission’s Guides Concerning the Use of Endorsements and Testimonials in Advertising.
- When working with website owners, bloggers, celebrities, or influencers to discuss and promote our products, we will require that the influencer clearly disclose their connection to WKKC and ensure that the content is presented in a context that makes clear that it is sponsored content or advertising.
- For our owned websites, channels, and applications:
  - We will include links to contact us information, privacy notice and terms and condition of use of website or application or participation in any promotion or activity promoted on the owned digital site, channel or application.
  - Will ensure any WKKC-owned or sponsored sites designed for children ages 6 to 12 comply with all applicable federal, state/provincial, and local laws and regulations pertaining to marketing to individuals under 13 year of age or related to children’s privacy.
  - We will comply with applicable federal, state/provincial, and local laws and regulations pertaining to use of ratings and reviews, including in

---

<sup>1</sup> Factors to consider are Brand Safety, suitability, local and regional consideration.

# WK Marketing and Communication Guidelines

how we syndicate reviews out from WKKC owned and managed websites to third party websites.

- We will comply with the applicable community guidelines for the platform on which we are advertising.
- All WKKC directed marketing on social media, whether through WKKC owned or controlled channels or through a third party, will comply with our WKKC Social Media Marketing Guidebook.
- We will not develop, sponsor or place content - including advertising, native or programmatic - on channels or programming that focus on violence, sex or encouragement or showing of behavior that is harmful to oneself, others, or society.
- WKKC Employees should avoid posting negative reviews of competitor brands. WKKC employees who post negative reviews of competitor brands must disclose that they are WKKC employees using any one of the following hashtags: #Employee, #WKEmployee, #IWork4WK, #IWorkForWK, or #IWork@WK. We require that all reviews of competitor brands be based on actual use and honest review of the product. We will not require nor encourage employees to post “fake” reviews of competitor brands.

## **Gaming and Streaming**

The following guidance applies to game sponsorships, gaming event sponsorships, influencer/gamer sponsorships, co-marketing partnerships, promotions, and product, brand, and character placement and licensing, including games.

We will comply with these guidelines or a local gaming rating system, whichever is stricter, in each of our markets. We will always conform our brand target audience with the corresponding game rating. Where applicable, we will comply with our Marketing to Children Commitment.

We will not sponsor, promote, or place products or brands in games that depict:

- Activities which are illegal, offensive, degrading, corrupt, threatening, discriminatory or obscene;
- Stereotypes based on social, racial, ethnic, religious, gender, age, sexual orientation, or physical traits;
- Unmitigated violence;
  - Mitigation considerations include:
    - The game is played in a fantasy environment;
    - The player is not in control of the violence;
    - The violence does not include blood, injury, or the display of bodies; and,
    - Guns, swords, or other weapons are not shown on our package graphics or promotional materials.

# WK Marketing and Communication Guidelines

- Violent or offensive language directed aggressively at another player or character;
- Use of drugs as a meaningful part of the storyline or tied to game incentives or rewards; or
- Sexual references or overtly sexual content as a meaningful part of the storyline.

## *Marketing to Children Commitment*

**Children younger than six (6) years old:** We do not market products to children younger than 6 years old.

**Children ages 6 to 12 years old:** We will only advertise products that meet our WK Nourishing Food Criteria on media primarily directed to children younger than 13.<sup>2</sup>

“Primarily directed to children younger than 13” generally means media that have a projected audience at the time of media purchase of 30 percent in the United States and 15 percent in Canada or more children younger than 13.<sup>3</sup> Where younger than 13 audience composition data is not maintained or available, WKKC will consider other factors as appropriate, which may include the overall impression of the advertising, actions to restrict child access and the target demographic based on WKKC’s media plan.

### What We Market to Kids – Nutrition Criteria

At WK Kellogg Co, we believe in the power of a bowl of cereal in helping kids meet their nutrient requirements and encourage positive eating behaviors. We have created our WK Nourishing Food Criteria<sup>4</sup> that all foods marketed to kids must meet that is in line with Dietary Guidelines for Americans:

- Must provide a key nutrient or food group kids don’t get enough: Fiber, Iron, Vitamin D, and/or Whole Grains (Whole Grains are first ingredient or > 16g of Whole Grains);

---

<sup>2</sup> We will not market any products on media that is primarily targeted to children younger than 6 years of age. However, the percentage of projected audience that is under 6 is included in the calculation of the population of a projected audience that is under 13 years of age.

<sup>3</sup> WK recognizes that as new forms of media, technology, and platforms come into use for marketing, age of population may not always be measured affirmatively. For markets or platforms where audience data for younger than 13 is not generally available, we will work to identify alternative solutions to estimate the proportion of children younger than 13 in the audience.

<sup>4</sup> If a local or regional nutrition standard for marketing to kids exists in a location in which we sell and market our cereal products that is stricter or inconsistent with our WK Nourishing Food Criteria, WK will comply with the local or regional standard. If a local or regional standard for marketing to kids exists that is consistent with the WK Nourishing Food Criteria but less strict, WK will comply with the stricter nutritional standard when marketing to kids.



# WK Marketing and Communication Guidelines



- No more than 25% DV of Added Sugar; and
- No more than 10% DV of Sodium or Saturated Fat.

## **How We Market to Kids – Marketing Criteria**

In addition to the above guidelines applicable to all consumers, WKKC takes special care to communicate responsibly with children ages 6 to 12. We will:

- Support the role of parents or others responsible for guiding diet and lifestyle choice;
- Be mindful not to create an undue sense of urgency or use inappropriate price minimization;
- Accurately portray our products, promotions and premiums in a way that is keeping with children’s ability to understand;
- Encourage appropriate safety gear for physical activities according to guidelines published by locally recognized sports or safety associations;
- Depict our trademarked characters as trustworthy figures and to use them to fuel our Feeding Happiness strategy to Make Eating Well Easy, Help Kids be Their Best and Better our Communities;
- Offer clear and appropriate nutrition information and encourage positive eating patterns and will not mislead children to believe that consumption of a product will directly result in changes such as popularity, intelligence, or athletic ability;
- Prevent confusion by not paying for or seeking out promotional product placement for any product in media directed to children;
- We do not advertise to children on sites that are not compliant with the Children’s Online Privacy Protection Act (COPPA); and
- When working with third parties/partners in marketing to kids we will align criteria to follow stricter criteria.

Where applicable, our communications with individuals ages of 6 to 12 will comply with the Better Business Bureau’s National Programs Children’s Advertising Review Unit Self-Regulatory Guidelines for Children’s Advertising: [CARU Advertising Guidelines](#).

# WK Marketing and Communication Guidelines

## **Marketing to Kids in Schools**

- We will not advertise<sup>5</sup> any products to children in elementary<sup>6</sup> schools (children younger than 13) except as permitted in these guidelines, and subject to school rules and permission. Exceptions include:
  - Displays used to hold our products, including materials that identify products being offered for sale;
  - Charitable fundraising activities;
  - Public service, including educational messaging;
  - Items provided to school administrators for their personal use; and
  - Charitable donations to schools.
- For all schools with students aged 13 or older, advertising of products primarily directed to students will be subject to school rules and permission and must relate to programs that fuel our Feeding Happiness strategy to Make Eating Well Easy, Help Kids be Their Best and Better our Communities.
- Product sampling and product-related research in schools with students aged 13 or older is permissible with the express written consent of the school administration and a parent/legal guardian of each participating student prior to the activity.
- We will only use our WKKC characters in middle school related events if the following criteria are met:
  - The character is related to a WKKC product that meets the WK Nourishing Food Criteria;
  - The character is associated with a brand that has products in schools that qualify use in schools; and
  - Character messaging is not focused on the brand or food but rather is focused on one of the following criteria:
    - Charitable fundraising activities or charitable donation event;
    - Public service, including educational or Feeding Happiness related messaging.

## **Use of Licensed Properties Directed to Children**

The following rules apply specifically to the use of child-directed, third-party licensed properties (e.g., characters, games, toys, movies):

- We will not use these licensed properties in communications primarily directed to children ages of 6 to 12 if the licensed property features a WK food item that does not meet WK Nourishing Food Criteria.

---

<sup>5</sup> Note distribution, display for sale, or sale of our products in product packaging is not considered “advertising” of the products.

<sup>6</sup> While we recognize that there may be local variations, we generally consider elementary schools to include children ages 6 to 12 years of age and from Kindergarten to Sixth Grade. We consider middle schools to include Seventh and Eighth Grades.

# WK Marketing and Communication Guidelines

- If we use these licensed properties as the basis for a food form/product, we will not market the licensed food item to children ages 6 to 12 unless it meets the WK Nourishing Food Criteria.

## **Age Restrictions for Sponsorships, Promotions, and Non-School Events**

- A brand may sponsor an event primarily directed to children ages 6 to 12 years if the products and merchandise promoted and distributed by the brand meet the WK Nourishing Food Criteria.
- Any WKKC-controlled character may attend an event primarily directed to children ages of 6 and 12 if there is no mention of product or consumption of food and the character messaging meets one of the following criteria.
  - Charitable fundraising activities or charitable donation event;
  - Public service, including educational or Feeding Happiness related messaging.
- The minimum age for participation in contests and promotions will be 16 years and older, except in situations where the nature of the promotion requires the minimum age to be 18 years old.
  - Age of participation for promotional content will at all times comply with applicable Data Privacy related laws and regulations.

## ***Compliance and Monitoring***

WKKC will ensure compliance with these guidelines. We provide comprehensive training to our marketers, communicators and agencies on these guidelines as part of both onboarding and periodic training reinforcement. If we become aware of a placement or practice that violates these guidelines, we will act to correct it.

We annually monitor and report compliance with these guidelines through a self-reported third-party audit. We review monitoring results and work with our marketing and media teams to address incidences of noncompliance and implement the appropriate corrective action to prevent future issues. These compliance reports will be disclosed in our annual Corporate Responsibility report beginning in 2025.