

Children's Food and Beverage Advertising Initiative
ConAgra Foods, Inc. Pledge
January 25, 2008

ConAgra Foods has a long-established commitment to marketing its products responsibly, including those marketed to families and children under 12 years of age. ConAgra Foods is proud of the positive role it has played in a wide range of organizations and programs that help support families and children, including:

- ConAgra Foods' Feeding Children Better program, which is dedicated to fighting childhood hunger.
- National sponsor of Kids Café, one of the nation's largest free meal service programs for children; providing free, hot, nutritious meals in safe and nurturing environments.
- Partnership with America's Second Harvest, helping food banks move food faster and farther so families won't go hungry.
- Local community outreach programs at various company locations, such as with The Greater Chicago Food Depository and Loaves and Fishes Food Pantry at our Naperville, IL location.

With particular regard to our children's advertising activities, ConAgra Foods is a supporter of the Children's Advertising Review Unit (CARU) of the Council of Better Business Bureaus (CBBB), and we adhere to their guidelines for advertising to children. The CARU Guidelines, which were updated recently to broaden and further strengthen CARU's oversight of advertising for food products directed to children, can be found at www.caru.org/guidelines/index.asp. We believe that adherence to these enhanced guidelines as actively monitored and enforced by CARU is a key component of a company's marketing practices involving children.

Consistent with our commitment to responsible marketing, ConAgra Foods is pleased to be a member of the Children's Food and Beverage Advertising Initiative (the "Initiative"), and is fully supportive of the goals and objectives of the Initiative. What follows is ConAgra Foods' specific Pledge in connection with its participation in the Initiative.

A. Identifying Information

1. Corporate name and address:

ConAgra Foods, Inc.
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Omaha, NE 68102
402-595-4000
www.conagrafoods.com

2. Contact information of an individual(s) responsible for Pledge implementation:

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3. Name of the specific entities covered by the Pledge:

All U.S.-based businesses of ConAgra Foods, Inc.

4. Name of each brand and/or product line covered by the Pledge:

Our Pledge covers the marketing activities in the United States (excluding territories and possessions) for all of ConAgra Foods' brands and businesses. The brands that have marketing activities directed to children as of the date of this Pledge that would fall within the scope of the Initiative are:

Chef Boyardee pasta
Kid Cuisine meals
Hunt's Snack Pack pudding
Peter Pan peanut butter

We will amend this list as necessary should we wish to market other brands to children under 12 at some future point in a manner that falls within the scope of the Initiative.

B. Core Principles

1. Overview of the ConAgra Foods Pledge

To promote healthier lifestyles and dietary choices for children, ConAgra Foods plans to devote 100 percent of its television, radio, print and Internet advertising primarily directed to children under 12 years of age to products

that meet the company's Children's Advertising Nutritional Guidelines, as set forth in Appendix 1 to this Pledge, and/or advertising that incorporates healthy lifestyle messaging (hereinafter the "Initiative Advertising Pledge"). The company further plans to limit the use of any licensed characters in such advertising and any products in its online interactive games primarily directed to children under 12 to products that meet its Children's Advertising Nutritional Guidelines, and/or incorporate healthy lifestyle messaging. We also are discontinuing product placements and advertising in elementary schools consistent with these core principles of the Initiative. We plan to have the Advertising, Licensed Characters, and Interactive Games elements of our Pledge fully operational by September 2008 for our *Kid Cuisine*, *Peter Pan* and *Hunt's Snack Pack* brands, and by June 2009 for our *Chef Boyardee* brand (which corresponds with the start of ConAgra Foods' fiscal year FY'10), if not sooner in each case.¹ We expect to have the remaining elements (i.e., Product Placement and In-school Advertising) in place by June 2008 to correspond with the start of our FY'09 fiscal year, if not sooner, with certain exceptions noted below.

ConAgra Foods' intention as of the date of this Pledge is to satisfy our Pledge commitments by focusing on products that meet our Children's Advertising Nutritional Guidelines. However, we reserve the right to promote healthy lifestyle messaging in the Pledge elements as noted herein in a manner consistent with the core principles of the Initiative. Should we decide at some future point to utilize this option in connection with our Pledge, we will provide the CBBB with further details, including the proposed healthy lifestyle messaging.

2. **A description of how ConAgra Foods intends to comply with the percentage requirement of the Advertising Message principle, including the following information:**
 - a. **For each covered medium (television, radio, print and Internet), the percentage of advertising (measured in media impressions) that ConAgra Foods intends to devote to healthy lifestyle messaging and the percentage of advertising that ConAgra Foods intends to devote to advertising products representing healthy dietary choices;**

Subject to the effective dates and any related exceptions detailed herein, ConAgra Foods plans to only advertise products in TV, print, radio and Internet media directed primarily to children under 12 that

¹ For example, the current marketing activities primarily intended for children under 12 for our *Peter Pan* brand are a few interactive games on its website, www.peterpanpb.com. These games already comply with our Pledge as the products incorporated in the games meet our Children's Advertising Nutritional Guidelines.

meet the company's Children's Advertising Nutritional Guidelines, and/or advertising that incorporates healthy lifestyle messaging.

b. The proposed method by which ConAgra intends to calculate media impressions for television, radio, print and Internet (excluding company owned websites) necessary to satisfy the percentage requirement;

For purposes of its Pledge, ConAgra Foods will consider advertising for television, radio, print and Internet to be "primarily directed to children under 12" if that demographic is estimated to comprise 35 percent or more of the audience for the particular medium. We will determine whether children under 12 comprise 35 percent or more of the audience demographic for a particular medium using the third party media measures set forth in Appendix 2 to this Pledge or similar media measures. In connection with our annual media planning, we intend to develop for each of these mediums a list of the programs, publications, Internet sites, etc. that meet the 35 percent minimum demographic threshold for children under 12. This master list will be shared with our brand and media purchasing associates internally as well as our appropriate third party agencies with specific instructions to follow to be consistent with our Pledge when purchasing media for the company.² We also will periodically monitor audience demographics for these mediums and adjust the list as necessary.

c. The proposed method by which ConAgra Foods intends to measure advertising on its owned websites;

All ConAgra Foods websites that are primarily directed to children under 12 will only show products that meet our Children's Advertising Nutritional Guidelines and/or promote healthy lifestyle messaging in connection with any content on the site that is primarily directed to children under 12.³

d. For products representing healthy dietary choices, state the scientific and/or governmental standard(s), or the company

² For purposes of our Pledge, this master list is intended to cover the expected audience of a particular program, publication, Internet site, etc. for the ensuing season or year, as the case may be, recognizing that audience demographics may vary during the course of a year from any percent demographics determined at the time the master list is developed and/or media is purchased.

³ For clarification purposes, some ConAgra Foods websites that are intended for children under 12 may want to include unique content that is primarily directed to adults, e.g., a "Mom's Corner." This content will be developed and designed to specifically appeal to adults and not children under 12, and will be separately identified and integrated within the site (e.g., a specific page within the site linked from the landing page). This adult-directed website content, including any products displayed or covered as part of this content, fall outside the scope of this Pledge.

developed standard(s) on which ConAgra Foods is relying to designate the product as a healthy dietary choice; and

ConAgra Foods' Children's Advertising Nutritional Guidelines are set forth in Appendix 1 to this Pledge. You will note that we have developed nutrition criteria for more food categories than the company is currently advertising to children under 12. This was done in anticipation that some of our brands in these additional categories (i.e., Nuts and Seeds, Peanut Butter, and Popcorn) may at some future point look to advertise to this demographic in a manner that falls within the scope of the Initiative and our Pledge.

- e. **To the extent ConAgra Foods is relying on a company developed standard, state the scientific and/or governmental standard(s) on which it is based.**

ConAgra Foods' Children's Advertising Nutritional Guidelines were developed by the company's nutritionists following U.S. Dietary Guidelines and applicable Food and Drug Administration and U.S. Department of Agriculture regulations for food products. The guidelines take into account the caloric and nutrient or food group contribution of the particular food product to the overall diet of a child. The specific rationale for each criteria set forth in these guidelines is provided in Appendix 1.

3. The manner by which ConAgra Foods intends to implement the Licensed Character principle, including the following:

- a. **The percentage reduction in the use of Licensed Characters in advertising that does not include healthy lifestyles/healthy dietary choices messaging; and**
- b. **The proposed basis for calculating such reduction, including a baseline figure from ConAgra Foods' use in FY 2006 of Licensed Characters in advertising, and a description of how the baseline figure was calculated.**

ConAgra Foods will limit the use of licensed characters in advertising primarily directed to children under 12 to products that meet our Children's Advertising Nutritional Guidelines and/or advertising that incorporates healthy lifestyle messaging. The effective date for this commitment will mirror the effective dates for the Initiative Advertising Pledge, i.e., September 2008 for our *Kid Cuisine*, *Peter Pan*, and *Hunt's Snack Pack* brands and June 2009 for our *Chef Boyardee* brand, if not sooner in each case.

4. A description of the manner by which ConAgra Foods intends to implement the Product Placement principle.

Effective June 2008, ConAgra Foods will not pay for or actively seek any new product placements for its food products in program/editorial content of any media primarily directed to children under the age of 12. This commitment does not apply to any product placements secured as of the date of this Pledge that may occur after June 2008.⁴

5. A description of the manner by which ConAgra Foods intends to implement the Interactive Games principle.

For any company-sponsored online games that are primarily intended for children under the age of 12, we will feature products that meet our Children's Advertising Nutritional Criteria and/or promote healthy lifestyle messaging. The effective date for this commitment will mirror the effective dates for the Initiative Advertising Pledge, i.e., September 2008 for our *Kid Cuisine*, *Peter Pan*, and *Hunt's Snack Pack* brands and June 2009 for our *Chef Boyardee* brand, if not sooner in each case.

6. A description of the manner by which ConAgra Foods intends to implement the Advertising in Schools principle.

Effective June 2008, we will not advertise to children in elementary school settings. This commitment does not apply to any such activities already planned as of the date of this pledge that may be wrapping up past the June 2008 date⁵ and is subject to the exceptions identified in the Initiative's core principles.

7. An implementation schedule for each commitment set forth in ConAgra Foods' Pledge.

Except as may be otherwise noted herein, our Advertising, Licensed Characters, and Interactive Games commitments will go into effect as of September 2008 for our *Kid Cuisine*, *Peter Pan*, and *Hunt's Snack Pack* brands and June 2009 for our *Chef Boyardee* brand, if not sooner in each case. These effective dates reflect existing media commitments and with particular regard to our *Chef Boyardee* brand, the level of reformulation required to meet the company's Children's Advertising Nutritional Guidelines for canned pasta products, which will necessitate a further

⁴ For example, a few ConAgra Foods brands, including *Chef Boyardee* and *Kid Cuisine*, are included in a movie that may appeal to children under 12 that is scheduled to be released late Spring/early Summer of 2008.

⁵ For example, ConAgra Foods has conducted programs with foodservice operators in the past that involved the use of branded premiums, such as kick balls and soccer balls, which could be used in an elementary school setting. As of June 2008 ConAgra Foods will not utilize any branding on these items, but customers and schools may have existing inventories to deplete.

reduction in sodium and saturated fat for these products. The remaining Pledge elements (i.e., Product Placement and In-school Advertising) will go into effect as of June 2008 (if not implemented sooner), again with some exceptions as noted.

C. Supporting Data

1. For each product that ConAgra Foods intends to comply with the healthy dietary choices portion of the Pledge:

- a. the product's name;**
- b. the product's nutritional labeling;**
- c. the product's ingredient list;**
- d. the established scientific, governmental and/or company developed standard relied on; and**
- e. the basis for concluding that the product meets the standard.**

The requested details for the products that meet our Children's Advertising Nutritional Guidelines as of the date of this Pledge and that we may market to children under 12 pursuant to this Pledge are provided in Appendix 1 (as to the underlying nutritional standards) and Appendix 3 (for the remaining details). We will provide the CBBB with similar details for any additional products as of the applicable effective date for the various pledge elements.

2. For each healthy lifestyle messaging option that ConAgra Foods intends to comply with the messaging portion of the Pledge:

- a. the messages ConAgra Foods intends to use (or a description of a source, for example, the Ad Council's "Small Step" Child Obesity Prevention campaign);**
- b. a representative sample of the messages; and**
- c. if the messages are to be joined with product advertising, a representative sample of product advertising including the messaging, when available.**

As noted above, ConAgra Foods' intention as of the date of this Pledge is to satisfy our Pledge commitments by focusing on products that meet our Children's Advertising Nutritional Guidelines. However, we reserve the right to promote healthy lifestyle messaging

in the Pledge elements as noted above in a manner consistent with the core principles of the Initiative. Should we decide at some future point to utilize this option in connection with our Pledge, we will provide the CBBB with further details, including the proposed healthy lifestyle messaging.

3. For those Participants that do not intend to advertise to children under 12:

- a. a description of the specific criteria the Participant will use for each covered medium (television, radio, print and Internet) to determine if advertising is primarily directed to children under 12; and**
- b. a media plan indicating the venues of the Participant's advertising on each covered medium and providing sufficient detail to determine whether the media is primarily directed to children under 12 in accordance with the criteria established under section 3(a) above.**

Not applicable

Appendices 1-3

Appendix 1

ConAgra Foods Children’s Advertising Nutrition Guidelines

	Meals	Canned Pasta	Pudding	Nuts and Seeds Peanut Butter	Popcorn
Per Serving					
Calories	≤500	≤350	≤100	≤200	≤200
Total Fat	≤ 35% of calories	≤ 35% of calories	≤ 35% of calories	n/a	≤ 35% of calories
Saturated Fat	≤ 10% of calories	≤ 10% of calories	≤ 10% of calories	n/a	≤ 10% of calories
Trans Fat	Labeled 0g	Labeled 0g	Labeled 0g	Labeled 0g	Labeled 0g
Sodium	≤ 760 mg	≤ 750 mg	≤240 mg	≤480 mg	≤480 mg
Positive Nutrients	≥10% DV for 3 nutrients	≥10% DV for 2 nutrients	n/a	≥ 10% DV for 1 nutrient	≥ 10% DV for 1 nutrient
Sugar	≤ 25% of calories as added sugar	≤ 25% of calories as added sugar	≤ 25% of calories as added sugar	≤ 25% of calories as added sugar	≤ 25% of calories as added sugar
Contains Food Groups	≥ ¼ c Vegetable or Fruit or 8 g whole grain	≥ ¼ c Vegetable or Fruit or 8 g whole grain	n/a	≥ 1 ounce equivalent Meat & Beans	≥ 1 ounce equivalent whole grain food

Rationale for Nutrition Guidelines

The specific criteria indicated in the Children's Advertising Nutritional Guidelines were established based on the following rationale:

Calories

Calorie guidelines are based on the labeled Daily Value (DV) of 2000 calories per day. For meals, the guideline is ≤ 500 calories. This number is an estimation derived by subtracting 20 percent from 2000 calories to account for snacks, then dividing the remainder by 3, assuming 3 meals a day. The calorie level for canned pasta is ≤ 350 calories. This level is based on two-thirds of the calories of the meal estimation, assuming an entrée would account for about two-thirds of the total meal. The calorie guideline for nuts and seeds, peanut butter, and popcorn is ≤ 200 calories, based on 10 percent of the 2000 calorie DV for one snack. The calorie level for pudding is ≤ 100 calories, which reflects the importance of portion control for these types of foods (i.e., sweet snacks).

Total, Saturated, and Trans Fat

Total fat, saturated fat and trans fat guidelines are based on the 2005 Dietary Guidelines that recommend a total fat intake of ≤ 35 percent of total calories, saturated fat intake of ≤ 10 percent of total calories and trans fat intake as low as possible. The total fat and saturated fat guidelines are not applicable to nuts and seeds and peanut butter as these are recognized food choices within the MyPyramid Meat and Beans food group.

Sodium

Sodium levels for meals are set at ≤ 760 mg per meal. This level is consistent with numerous third party nutrition guidelines that apply to the use of licensed properties for food products, and we believe is a responsible guideline for children's meals. This 760 mg limit is also significantly lower than the regulated sodium disclosure level for meals of 960 mg. The sodium level for canned pasta is set at ≤ 750 mg. This reflects a reduction of 17 percent from the current category average of 900 mg, and a 32 percent reduction from the category average of 1100 mg in 2005. The sodium level for nuts and seeds, peanut butter, and popcorn is based on the level (≤ 480 mg) that an individual food must meet (along with separate limits for certain other nutrients) to qualify as "Healthy" per the applicable regulatory definition. Since the pudding portions are ≤ 100 calories, a lower sodium level of ≤ 240 mg, or half the "Healthy" defined sodium level for an individual product, will be used as the guideline. Overall, these sodium limits are consistent with ConAgra Foods' ongoing goal of identifying and implementing where technically feasible moderate, continuous decreases in the sodium content of its products.

Positive Nutrients

The guidelines for occurrence of positive nutrients are consistent with the NLEA definition of "Healthy," wherein meals are a good source of at least three beneficial nutrients, entrees are a good source of at least two beneficial nutrients and individual

items are a good source of at least one beneficial nutrient (with the exception of pudding given the 100 calorie limit).

Sugar

The guideline for sugar is based on the Institute of Medicine’s recommendation that added sugar should account for no more than 25 percent of total calories.

Food Groups

MyPyramid eating patterns are the means by which consumers can implement the Dietary Guidelines. Thus, foods advertised to children, with the exception of pudding, will provide at least 10 percent of the recommended daily amount of a MyPyramid food group based on a 2,000 calorie diet.

APPENDIX 2

Third Party Media Measures

Medium	Audience Composition	Measurement of Audience Composition
Television (National & Local)	35% or greater is under 12	Nielsen (ages 2-11)
Print	35% or greater is under 12	Simmons and/or MRI (ages 6-11)
Radio	35% or greater is under 12	Programming specifically designed to appeal to or which is primarily targeted to children under 12
Internet	35% or greater is under 12	Comscore (ages 2-11)

Measurement and Calculations

For these measured media, any medium where 35 percent or more of the total viewing audience is under 12 years of age will be considered “children’s advertising.” Audience demographic calculations will be measured in media impressions primarily directed to specific demographic groups at the time the advertising is planned, as determined by AC Nielsen ratings for TV, Comscore for Internet, and MRI and Simmons data for Print. Our measurements will be calculated separately for each advertising medium. For Radio, we will focus primarily on the station programming and content to be placed as currently there are no major third party resources that measure on an ongoing basis the “under 12” segment for this medium.

APPENDIX 3

Section C.1. Supporting Data