

**Children's Food and Beverage Advertising Initiative
Mars Pledge
Updated January 1, 2010**

Covered Entities

Mars, Incorporated ("Mars"), on behalf of:

Mars Chocolate North America, LLC ("Mars Chocolate"), Mars Food U.S. ("Mars Food") and Wm. Wrigley Jr. Company ("Wrigley")

c/o 6885 Elm Street
McLean, VA 22101

Individual Responsible for Overall Implementation

Eric Olsen, Senior Vice President, Corporate Affairs and Public Policy
Mars, Incorporated
6885 Elm Street
McLean, VA 22101

Product Line(s) Covered by Pledge

All snack food and confectionery, bubble gum and rice product brands.

Core Principles

Mars is proud of its products, which have brought enjoyment and pleasure to consumers of all ages for many years. Mars, as a responsible and family-friendly marketer, supports the Children's Food and Beverage Advertising Initiative (CFBAI). Confectionery and snack foods are treats that can be enjoyed by the whole family, but should be consumed only in moderation as part of an overall balanced and healthy diet and active lifestyle. We will continue to advertise our traditional confectionery, snack food, bubblegum and rice brands in venues suitable for families, and respect the important role of parents as gatekeepers of all of the products that children under 12 consume.

Mars continues to develop new products that will provide nutritional benefits to consumers. In addition, we continue to develop our Wrigley portfolio of sugar-free chewing gum, which science has shown provides important oral health benefits. Reflecting our commitment to respect the important role of parents, marketing communications for our food and snackfood products, including our "Better for You" products, will not be primarily directed to children under 12. Mars voluntarily offers general information on nutrition and healthy lifestyles on many of its brand websites, as well as at www.marshealthyliving.com.

Mars is pleased to work with the CFBAI in promoting responsible self-regulation of food advertising. Mars associates, as well as advertising, marketing, media buying and other agencies, have been instructed to comply with these policies.

Use of Licensed Characters

Mars will not use third party Licensed Characters in advertising primarily directed to children under 12.

Product Placement

Mars will not seek or authorize paid product placements in television, films or other media primarily directed to children under 12.

Interactive Games

Interactive games at Company websites featuring traditional confectionery and snack food products, bubblegum and rice will be primarily directed to adults and teens.

Elementary School Advertising

Mars will not advertise covered products in elementary schools.

Criteria We Apply to Determine that Advertising is Directed to Children 12 and Older

3rd Party media and websites: Mars will not purchase advertising time or space in television, radio, print and Internet venues primarily directed to children for traditional confectionery, snackfood, bubblegum or rice products. This includes child-directed content, such as television programming during kids-block times or other television programs primarily directed to children under 12, and print publications (like National Geographic Kids, etc.) or Internet sites whose content is principally aimed at children under 12.¹ Media buying agencies will make adjustments to media buys periodically to reflect this pledge commitment.

Our own Websites: Our websites, including our traditional snack food, confectionery and bubblegum websites, are primarily directed to adults and teens, not children. We do not advertise these websites to audiences consisting primarily of children under 12.

The Company's associates, advertising and promotional agencies and media buying agencies have been instructed to comply with this pledge commitment.

¹ For purposes of this commitment, the Company will not purchase time or space in television or radio dayparts, or print or Internet venues, where the composition of the under-12 audience at the time the media is purchased is estimated to exceed 25% of the total audience. This standard will apply to the expected audience over the entire season in which a television program or program block is aired, understanding that audience demographics can vary from week to week from estimates at the time the media is purchased.