

**Council of Better Business Bureaus
Children’s Food and Beverage Advertising Initiative
Burger King Corporation’s Pledge**

Entity Covered by Pledge: Burger King Corporation
5505 Blue Lagoon Drive
Miami, FL 33126

Name of individual(s) responsible for Overall implementation of the Pledge:
Brian Gies, Vice President, Marketing Impact

Brand/Product Line Covered by Pledge: BURGER KING® food and beverages.

BURGER KING® restaurants for more than 50 years have been serving menu offerings that represent quality, value, and taste. Our heritage stems from our long-standing HAVE IT YOUR WAY® brand promise, which gives customers in BURGER KING® restaurants the opportunity to customize their menu choices to meet their individual tastes, preferences, and lifestyles. We remain committed to offering a variety of food and beverage products that will make it easy for us to fulfill our HAVE IT YOUR WAY® brand promise to our customers. To that end, we will use product innovation as a vehicle to develop more menu options that promote a balanced diet. Through our Pledge to the Children’s Food and Beverage Advertising Initiative of the Council of Better Business Bureaus, we will communicate messages about our new and innovative food and beverage products to help promote a balanced diet, and active lifestyle choices among our younger customers.

OUR PLEDGE:

➤ **Advertising Commitment:**

- **National Television Advertising¹:** One hundred percent (100%) of National Television Advertising primarily directed to children under 12 years old² will be for Kids Meals³ that meet the Burger King Corporation Nutrition Criteria⁴. In

¹ “National Television Advertising” shall include any television commercial message paid for and approved by Burger King Corporation and its affiliates that is disseminated to all or substantially all of the United States and measured in National Gross Rating Points at the time the advertising is purchased.

² “Advertising primarily directed to children under 12 years old” means: (1) Media purchased according to Nielsen standard demographics for audiences under 12 for television and internet and media purchased according to Arbitron standard demographics for audiences under 12 for radio; or (2) media purchased for any program or website where the audience generally consists of 30% or more children under the age of 12 years.

³ “Kids Meals” are specifically defined on page 6 of this Pledge.

⁴ “Burger King Corporation Nutrition Criteria” is specifically defined on page 3 of this Pledge.

addition, some of our National Television Advertising will promote Healthy Lifestyle Messages.”⁵

- **National Radio Advertising**⁶: One hundred percent (100%) of National Radio Advertising primarily directed to children under 12 years old will be for Kids Meals that meet the Burger King Corporation Nutrition Criteria. In addition, some of our National Radio Advertising will promote Healthy Lifestyle Messages.
- **National Print Advertising**⁷: One hundred percent (100%) of National Print Advertising primarily directed to children under 12 years old will be for Kids Meals that meet the Burger King Corporation Nutrition Criteria. In addition, some of our National Print Advertising will promote Healthy Lifestyle Messages.
- **National Internet Advertising**⁸: One hundred percent (100%) of National Internet Advertising primarily directed to children under 12 years old on third party Internet websites will be for meals that meet the Burger King Corporation Nutrition Criteria. In addition, all food pages of our company-owned websites that are primarily directed to children under 12 years old will be for Kids Meals that meet the Burger King Corporation Nutrition Criteria. In addition, we will include materials on our websites that promote Healthy Lifestyle Messages.

National Television Advertising, National Radio Advertising, National Print Advertising and National Internet Advertising shall hereinafter be collectively referred to as our “National Advertising.”

⁵ “Healthy Lifestyle Messages” are defined specifically on page 4 of this Pledge.

⁶ “National Radio Advertising” shall include any radio commercial message paid for and approved by Burger King Corporation and its affiliates that is disseminated to all or substantially all of the United States and measured in National Gross Rating Points at the time the advertising is purchased.

⁷ “National Print Advertising” shall include any print commercial message paid for and approved by Burger King Corporation and its affiliates that is disseminated to all or substantially all of the United States and measured in impressions at the time the advertising is purchased. National Print Advertising does not include: point of purchase materials (i.e., menus, tray liners, signs, packaging, table tents, etc.).

⁸ “National Internet Advertising” shall include any internet commercial message paid for and approved by Burger King Corporation and its affiliates that is disseminated to all or substantially all of the United States.

➤ **Supporting Data for the Advertised Kids Meals**

We are currently developing menu options to meet the Burger King Corporation Nutrition Criteria outlined below and more specifically on **Appendix A**. The Kids Meals we advertise as of the implementation date of our Advertising Commitment will meet the Burger King Corporation Nutrition Criteria.

• **Burger King Corporation Nutrition Criteria:**

We will honor our Advertisement Commitment using the following Burger King Corporation Nutrition Criteria:

The Kids Meal (consisting of an entrée, side dish and beverage) advertised in our National Advertising will provide, in total:

- No more than 560 calories per meal;
- Less than 30 percent of calories from fat;
- Less than 10 percent of calories from saturated fat;
- No added trans fats; and
- No more than 10 percent of calories from added sugars.

The scientific and/or governmental standard(s) on which the Burger King Corporation Nutrition Criteria is based is set forth on **Appendix A**.

- **Implementation Schedule:** The Advertising Commitment will go into effect no later than December 31, 2008.

➤ **Use of Licensed Characters Commitment:**

- We will limit the use of third-party licensed characters in 100% of our National Advertising primarily directed to children under 12 years old to the promotion of Kids Meals that meet the Burger King Corporation Nutrition Criteria.⁹
- **Implementation Schedule:** The Use of Licensed Characters Commitment will go into effect no later than December 31, 2008.

⁹ Pursuant to the core principles set out in Children's Food and Beverage Advertising Initiative, the above commitment does not apply to (i) the use of licensed characters on packaging, provided the packaging does not appear in advertising directed to children under 12; and (2) the use of company-owned characters.

➤ **Product Placement Commitment:**

- We will not approve, pay for, or actively seek the placement of BURGER KING® food or beverage products in the program/editorial content of any medium in the United States primarily directed to children under 12 years old.¹⁰
- **Implementation Schedule:** The Product Placement Commitment will go into effect no later than January 1, 2008.

➤ **Interactive Games Commitment:**

- We will not approve, pay for or actively seek the placement of BURGER KING® food or beverage products in any of our own and/or any third party interactive game in the United States primarily directed to children under 12 years old for the purpose of promoting the sale of those products unless such food and beverage products are Kids Meals that meet the Burger King Corporation Nutrition Criteria¹¹.
- **Implementation Schedule:** The Interactive Games Commitment will go into effect no later than December 31, 2008.

➤ **Advertising in Schools Commitment:**

- We will not advertise our food or beverage products in elementary schools.¹²
- **Implementation Schedule:** The Advertising in Schools Commitment will go into effect no later than January 1, 2008.

¹⁰ The foregoing commitment does not apply to any local product placement activities engaged in by independent franchisees of Burger King Corporation.

¹¹

The foregoing commitment does not apply to any local activity engaged in by independent franchisees of Burger King Corporation.

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The foregoing commitment does not apply to any local activity engaged in by independent franchisees of Burger King Corporation. Further, pursuant to the core principles set out in Children's Food and Beverage Advertising Initiative, the above commitment does not apply to displays of food and beverage products, charitable fundraising activities, public service messaging, or items provided to school administrators.

➤ **Healthy Lifestyle Messages Commitment:**

- As a food company, our primary focus in our National Advertising will be on Kids Meals that meet the Burger King Corporation Nutrition Criteria. However, to help promote active lifestyles in children, we will also include in some of our National Advertising certain nutrition and/or activity messages (“Healthy Lifestyle Messages”). Our Healthy Lifestyle Messages will vary and will include general themes related to nutrition and/or physical activity from a variety of federal government campaigns, including MyPyramid, MyPyramid for Kids, and the U.S. Department of Health & Human Services and Centers for Disease Control and Prevention’s VERB campaign.
- **Implementation Schedule:** The use of Healthy Lifestyle Messages Commitment will go into effect no later than December 31, 2008.

Appendix A

Supporting Data for The Burger King Corporation Nutrition Criteria

Overview

As part of our Pledge to the Children’s Food and Beverage Advertising Initiative of the Council of Better Business Bureaus, 100% of our National Advertising primarily directed to children under 12 years old will be restricted to Kids Meals that meet nutrition criteria that promote responsible meal portion sizes and limit total fat, saturated fat, added trans fat, and added sugars.

The Burger King Corporation Nutrition Criteria for nationally advertised Kids Meals are based on federal dietary recommendations and published, peer-reviewed science. The Dietary Guidelines for Americans 2005 (“Dietary Guidelines”)¹³ are the primary basis for the criteria, as demonstrated below.

Specifically, the kids’ meals consisting of an entrée, side dish and beverage (each a “Kids Meal” and collectively “Kids Meals”) advertised in our National Advertising will provide, in total:

- No more than 560 calories per meal;
- Less than 30 percent of calories from fat;
- Less than 10 percent of calories from saturated fat;
- No added trans fats; and
- No more than 10 percent of calories from added sugars.

We will consult with the Council of Better Business Bureaus about the actual Kids Meals we intend to advertise as a part of this Pledge.

¹³

U.S. Department of Health and Human Services and U.S. Department of Agriculture. Dietary Guidelines for Americans, 2005. 6th Edition, Washington, DC: U.S. Government Printing Office, January 2005.

Support for Nutrition Criteria

The Burger King Corporation Nutrition Criteria are based on the Dietary Guidelines and other federal and scientifically established dietary recommendations, as demonstrated below:

- **The advertised Kids Meal will provide no more than 560 calories.**

- The Dietary Guidelines provides guidance on total calorie intake levels for various gender and age groups at three different levels of physical activity: sedentary, moderate activity, and active.
- The Dietary Guidelines recommends a range of 1,200 – 1,800 calories per day for children ages 4 – 8 and a range of 1,600 – 2,600 calories for children ages 9 – 13. The ranges within the age groups are based on gender and physical activity levels.
- Burger King Corporation determined 1,700 calories to be the average total daily caloric intake for children ages 4 – 8 and 9 – 13, based on the recommendations for sedentary and moderately active exercise levels, which range from 1,200 – 2,200:
 - Sedentary 4-8 year olds: 1,200
 - Moderately Active 4-8 year olds: 1,600
 - Sedentary 9-13 year olds: 1,800
 - Moderately Active 9-13 year olds: 1,800-2,200

While Burger Corporation supports higher activity levels, these two activity levels were selected based on government data from the Centers for Disease Control and Prevention's Youth Risk Behavior Surveillance Survey that indicate only 35.8 percent of youth met the currently recommended levels of physical activity.¹⁴

- By limiting the total calories in the advertised Kids Meal to 560 calories, this ensures that the meal does not contribute more than 1/3 of the 1,700 calorie average that children should consume in a day.
- **The Nationally Advertised Kids Meal will provide less than 30% of calories from fat.**
 - The Dietary Guidelines recommends a fat intake of 25 to 35 percent of calories for children and adolescents 4 – 18 years of age.

¹⁴ Centers for Disease Control and Prevention. Youth Risk Behavior Surveillance Summaries, 2005. MMWR 2006;55(No. SS-5505).

- By limiting the total fat of the advertised Kids Meal to less than 30 percent of total calories, this ensures that the advertised Kids Meal is well within the recommended range.
- **The advertised Kids Meal will provide less than 10% of calories from saturated fat.**
 - The Dietary Guidelines recommends keeping saturated fat intake below 10 percent of total calorie intake.
 - By limiting the saturated fat of the advertised Kids Meal to less than 10 percent of total calories, this ensures that the meal is consistent with the Dietary Guidelines recommended limit.
- **The advertised Kids Meal will provide no added *trans* fat.**
 - The Dietary Guidelines recommends limiting intake of *trans* fat, recognizing that some *trans* fats are naturally occurring and often present, at low levels, in nutrient dense foods such as animal products, but does not provide a specific maximum intake level for *trans* fats. Likewise, the American Heart Association’s “Dietary Recommendations for Children and Adolescents” echoes the Dietary Guidelines and recommends diets low in *trans* fat.¹⁵
 - The provision that no added *trans* fats will be included in the advertised Kids Meal is consistent with the Dietary Guidelines and American Heart Association’s recommendation to limit intake of *trans* fats.
- **The advertised Kids Meal will provide no more than 10% of calories from added sugars.**
 - The Dietary Guidelines recommends choosing food and beverages with little added sugars or caloric sweeteners, but does not provide a specific recommended limit.
 - The Institute of Medicine’s Dietary Reference Intakes recommends that added sugars should comprise no more than 25 percent of total calories consumed.¹⁶

¹⁵

American Heart Association. “Dietary Recommendations for Children and Adolescents: A Guide for Practitioners: Consensus Statement from the American Heart Association.” *Circulation* 2005;112;2061-2075.

¹⁶

Institute of Medicine. Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein, and Amino Acids; September 2002.

- By limiting the added sugar of the advertised Kids Meal to no more than 10 percent of total calories, this ensures that the meal is consistent with both the Dietary Guidelines and Institute of Medicine’s recommendations.

Sample Advertised Meal (in development)

The following chart gives an example of the potential nutritional values of a Kids Meal we are exploring for an advertised meal. These values are subject to change based on the product development work.

Food Item	Calories	Fat/Fat Calories	Sat Fat/Sat Fat Calories	Added Sugar	Sodium
Flame Broiled CHICKEN TENDERS® (4pc)	145	6g / 54	1.5g / 13.5	0g	370mg
MOTT’S® Organic Unsweetened Apple Sauce	50	0g / 0	0g / 0	0g	0mg
HERSHEY’S® 1% Low Fat White Milk	110	2.5g / 22.5	1.5g / 13.5	0g	130mg
Total	305	8.5g / 76.5	3g / 27	0g	500mg

The proposed advertised Kids Meal meets the requirements of the Burger King Corporation Nutrition Criteria:

- Approximately 25% of the total calories are derived from fat
- Approximately 9% of the total calories are derived from saturated fat
- No added sugar
- No added *trans* fat
- Total Calories are 305, well below the 560 calories put forth in the pledge

The ingredients for the meal items are:

Flamed Broiled CHICKEN TENDERS®:

Chicken breast with rib meat, water, salt, sodium phosphate, modified corn starch and flavoring. Glaze ingredients TBD

MOTT’S® Unsweetened Organic Apple Sauce:

Organic apples, water, ascorbic acid.
(See attached product specs)

HERSHEY’S® 1% Low Fat Milk:

Lowfat Milk, vitamin A palmitate, vitamin D3. Contains 25% of the Daily Value of vitamin D.

We will consult with the Council of Better Business Bureaus about the actual Kids Meals we intend to advertise as a part of this Pledge.