



**RULES OF ACCEPTANCE OF ADVERTISING MATERIALS  
FOR BROADCASTING AT CHANNELS  
OF  
THE WALT DISNEY COMPANY**

## **I. INTRODUCTION**

For over eight decades Walt Disney has been the leader in the family entertainment industry. Established in the '20s of the previous century as a cartoon studio, today the Walt Disney Company (TWDC) is a global corporation, which is proud to provide the highest quality entertainment to each family member in the whole world. The Company, in all its actions, combines such values as community, optimism and good habits. Thanks to that parents perceive Disney as the highest quality brand and trustworthy entertainment.

TWDC, together with its subsidiaries and affiliates, is a leading international family entertainment media enterprise with diversified offer. Presence in such complex and various environments required development of joint policy for Disney brand protection. To do so, a set of standards was composed to guarantee that no activities would breach settled standards, rules and legal provisions concerning marketing content directed to the youngest audience.

This document also considers studies on children development, sensitivity of modern family, dominant social values, local culture and legal provisions.

This document contains guidelines concerning acceptance of advertising and sponsoring materials at the stations owned by TWDC. The following rules and examples are not exhaustive and all advertising and sponsoring materials will be analysed and approved each time by the legal department of Disney Company.

For questions referring to this document, please contact the company responsible for the sales of advertising time or Disney Media Sales & Partnership team.

## **II. RULES APPLIED FOR ADVERTISING**

### **1. GENERAL STANDARDS**

- A. It is forbidden to broadcast hidden or misleading advertisement.
- B. Advertisement should be adequate to given age group to which it is directed and it cannot give rise to needs inadequate to age of children or give rise to will of possessing products not intended for them.
- C. Advertisement should not raise unrealistic expectations.
- D. Standard process of broadcasting of all advertising materials includes necessity to obtain the acceptance of the legal department, brand protection department and marketing department with regard to compliance with the following provisions, legal provisions regulating advertising activity and with guidelines concerning Disney brand protection.

### **2. IT IS FORBIDDEN TO BROADCAST ADVERTISEMENTS:**

- A. inducing to purchase;

- B. directly exhorting juveniles to purchase products or services by abuse of their lack of experience or their credulity. Value of advertised products cannot lead to the wrong perception of their real value e.g. use of phrases and words such as “only”, “not much” in improper context;
- C. containing language exhorting to purchase, techniques of aggressive advertisement forcing or ordering undertaking specific activities by a child with regard to advertised products or services;
- D. encouraging juveniles to put pressure on parents or another person to make them buy advertised products or services; advertisement cannot suggest that the product is available for any household budget;
- E. making juveniles feel worse than other children, if they would not purchase advertised product or service;
- F. scaring by frightening materials, having an effect on emotions;
- G. containing vulgar language and cursing;
- H. having hidden effect on subconscious;
- I. in unjustified manner showing juveniles in dangerous situations.

### **3. ADVERTISEMENT CANNOT:**

- A. violate human dignity;
- B. contain humiliating, misrepresented or discriminating content related to race, gender, nationality, age, skin color, language, social origin, national or ethnic minority, disability or sexual orientation;
- C. hurt religious or political beliefs;
- D. threaten physical, psychological or moral development of juveniles; including materials with sexual subtext, sexually provoking or containing sexual suggestions or allusions and containing nudity or extensive or unjustified exposition of body;
- E. be favourable to behaviours dangerous for one’s health, safety or environmental protection, which can be easily copied by juveniles in harmful manner or other activities related to crimes, which can induce to criminal acts;
- F. present dangerous and anti-social behaviours to avoid probable copying or suggestion that the given behaviour is accepted;
- G. contain any declarations or visual presentations, which can violate decency standards or general moral rules accepted by potential viewers.

### **4. ADVERTISEMENT AND CHILDREN SAFETY**

- A. Advertisement must be coherent with generally accepted safety standards, and situations presented in it must be compliant to legal provisions e.g. wearing helmet during bicycle ride, on rollers, scooters or motorcycles, wearing helmet and knee pads during roller-skating, wearing life-jackets on boats or rafts, wearing seatbelts on front and back seats of cars, constant presence of adult during children play in the bathtub, swimming pool, lake or sea.

## **5. ADVERTISEMENT AND COMPETITIONS, PROMOTIONS AND SPECIAL OFFERS**

- A. Competitions must be adequate for viewers including children in visual and verbal manner.
- B. A competition cannot encourage, induce or advise children to purchase product or to take part in competition to win awards for themselves or for an adult, or to talk an adult into purchase of product to take part in a competition.
- C. Competitions should contain clear information on regulation and rules related to taking part in them, rates for every phone call, etc.
- D. It is necessary to avoid competitions requiring involvement of a juvenile by phone call or by sending text messages; in case of providing a phone number, it must be said that the juveniles should ask their parents or guardians for permission to use the phone.
- E. Competitions should not encourage to multiple buying of a product or series of products.
- F. Competitions should be developed and carried out by an operator according to local legal provisions.
- G. Competitions cannot describe offer as free, if there are additional costs other than standard payment for stamp or courier package, standard phone call rates or justified costs of travel required to collect offer; advertisements must clearly specify scope of responsibility of the consumer for any costs.
- H. Advertisement of competitions cannot be misleading with regard to guarantee of receiving award. It should say about a chance of winning an award.
- I. All advertisements concerning a mechanism of competitions shall be analysed in detail with respect to their compliance to TWDC programs policy and guidelines contained in this document.

## **6. MOBILE NETWORK ADVERTISEMENTS**

- A. Advertisements of mobile network operators must contain all the information on prices and declaration of necessary permission of parents to use the offer, if advertisement is directed to juveniles.
- B. Phone numbers with higher rates should be skipped in advertisements for juveniles.

## **7. ADVERTISEMENTS OF FOOD PRODUCTS**

- A. Advertisements of food products must be in accordance with accepted nutrition criteria defined in the Disney EMEA Nutritional Guidelines document and in the document commissioned by the Polish Food Federation and approved by the Ministry of Health, which is annexed to the Broadcasters Agreement. Food product must be also in accordance with the nutrient profiling scheme published by the UK Food Standards Agency (FSA). It may be found on:  
<https://www.gov.uk/government/publications/the-nutrient-profiling-model>
- B. Advertisers are obliged to submit written information of nutrition profile of the advertised product or to sponsorship billboard.
- C. Advertising of quick services restaurants (fast food restaurants) will not be permitted. Others restaurants may be approved when the kids menu will entirely pass through the criteria for a full meal.

- D. Advertisements should not decrease the role of parents or adults who are role models in provision of valuable diet information or promotion of healthy habits, balanced diet or healthy and an active lifestyle.
- E. Advertisement of snacks and non-alcoholic beverages cannot advise or suggest coincidental and/or excessive use of a given product.

## **8. ADVERTISEMENTS OF TOYS**

- A. On standard basis, advertisements of toys should reflect exact experiences related to their use and it is forbidden to apply techniques of animation to present manners of use of a product, which are impossible to apply in reality e.g. if a given toy is advertised as a moving toy, it must be clearly stated, if it moves independently or if it must be moved manually; in case of presentation of blocks or toy sets, it is possible to show toys assembled without human assistance. However, in case of lack of clearness in respect of the abilities of the given product, it is necessary to present the method for its assembly.
- B. In case when sizes of toys and similar products may be significant factors to understand advertisement, the main size must be easy to assess by its comparison to similar object of obvious size.
- C. A toy, game or comparable children's product advertisement must include a statement of its price or approximate price, if that product costs equivalent of 30GBP or more

## **9. ADVERTISEMENTS OF PERSONAL HYGIENE PRODUCTS**

- A. Advertisement of personal hygiene products including products containing warning "keep away from children" will be each time approved by TWDC.
- B. Advertisements of products for women such as pads and creams will be, each time, analysed by TWDC. After possible approval such advertisements should be broadcasted in the evening. The activity of shaving ones face or legs in advertisements of shaving products should not be showed due to risk of the possibility of children copying such activities.
- C. The tone of advertisement of sanitary towels and tampons must be discreet rather than explicit or overt. There should be no focus on the private parts, whether anatomical diagram or live female, even if the approach is scientific or clinical. The emphasis should be on conveying general all-round comfort, freedom or natural living. For example, ease of movement can be conveyed by depicting a woman happily going about her daily activities (like running, dancing etc.), without drawing attention to the private parts. The approach can be scientific or clinical but without specific anatomical references. There should be no detailed, explicit or lengthy description of the product and how it works. The terms 'menstruation' and 'period' should not be used. If necessary, generic discreet phrases such as 'those special days' or 'those days when...' or 'that time in the month' can be used.

## **10. ADVERTISEMENTS OF CHARITIES AND SOCIAL CAMPAIGNS**

- A. It is not foreseen to broadcast commercial spots of charities and social campaigns, especially with too emotional content or content disturbing emotional condition of children.
- B. No communications related to collection of money should be directed to children.
- C. Educational spots are permissible, if their content is adjusted to juvenile viewer.

## **11. ADVERTISEMENTS OF WWW WEBSITES AND INTERNET PORTALS**

- A. Each website address presented on advertisement should be coherent with the advertisement. This means that websites intended for adult web users cannot use traditional creation in communication with children.
- B. Website addresses should not contain links to websites containing materials intended for adults or with inadequate content.

## **12. SOCIAL MEDIA REFERENCES**

- A. References to 13+ age-gated sites like Facebook may be possible on a case by case, conditional basis, i.e. FB logo only, targeting high majority of 13+ viewers, and probably time restricted.
- B. Must not have any drive or call to action to social media, nor have FB website or URL.
- C. May be possible on a case by case basis on DJR only, to drive to FB if parents are clearly addressed, not kids, and where parents are interacting with that content – the creative must have an adult feel and the script must clearly state: ‘Mum and dad ...’. Spots should be sent to the regional team for pre-approval.
- D. No references to YouTube (although it is not age-gated) mainly because of ease of getting to more adult areas of the site.
- E. Hashtags references #product name or #movie title, eg. #Kelloggs or #TheGoodDinosaurMovie can be taken if there is no call to action to social media, subject as before to case by case approval and checking of the # link.

## **13. ADVERTISEMENTS OF APPLICATIONS OR APPS REFERENCES**

- A. Adding ‘parent permission’ disclaimer is required only where the product or service mandates that a parent must approve sign up. (This is on the basis that the app stores are gatekeepers of the age restrictions and parental involvement. Apple, Amazon and Google app stores require users to be 13+ to set up an account to download an app, and this would also include downloading and paying for free apps which include IAPs or paid for/premium apps; OR have permission from a parent or legal guardian (e.g. though Family Sharing function).
- B. If a free to download app contains IAPs then in a child-directed ad spot where the ad refers to FREE there must be a disclaimer “contains in app purchases” e.g. “Free to download – contains in app purchases”.

- C. If the ad is promoting a free app (and is referencing FREE) but is featuring any visuals of premium/paid-for content the following disclaimer is required: “Features shown require [purchase/membership]”.
- D. If any app/game cannot be meaningfully played or fully enjoyed without making in-game purchases then the app/game must never be described as FREE.
- E. “App is available on ....” Information need to be added to each spot.
- F. Trademark information is required.

#### **14. ADVERTISEMENTS USING CHARACTERS AND CONTENTS POPULAR AMONG CHILDREN – PLACEMENT REQUIREMENTS**

- A. Advertisements for merchandise based on a children’s programme must not be broadcast in the two hours before or after episodes or editions of that programme.
- B. Persons (including puppets and animated characters) who appear regularly in any children’s programme must not present or endorse products in advertisements aimed at children. E.g. Mickey Mouse should not point the product saying „Discover the new Mickey figurines”.
- C. Advertisements featuring a well-known person, or a person whose appearance is central to a children’s programme (including cartoon and puppet characters), must not be scheduled in breaks in or adjacent to that programme.
- D. Advertisements containing appearances by persons in extracts from a children’s programme must not be broadcast in the two hours before or after an episode or edition of the relevant programme.
- E. All advertisements must be adequate to air time for which they were planned.

#### **15. REACTION TO LIGHT STIMULI**

- A. Flashing, glinting or interrupted images and some types of regularly repeated patterns can cause convulsions to epileptics, and they must be avoided in advertisements.

#### **16. IT IS FORBIDDEN TO BROADCAST ADVERTISEMENTS OF:**

- A. tobacco products;
- B. alcoholic beverages;
- C. OTC and prescription drugs, vitamins and food supplements;
- D. religious associations or communions;
- E. The occult etc.;
- F. Hypnosis-based producers, psychiatry, psychology, psychoanalysis and psychotherapy;
- G. energy drinks including those containing stimulants or caffeine;
- H. some films, TV programs, video games or open-air events marked with high age category;
- I. films, TV programs and magazines for adults; e.g. 15+, 18+ etc.;
- J. gambling; including lotteries and scratch cards, casinos;
- K. individual advice on consumers’ or personal problems;
- L. Private investigation agencies or escort agencies;

- M. Some investments products;
- N. Premium rate phone services;
- O. Some home-working schemes;
- P. slimming products or treatments or places providing services of such type, which present “wonderful” effects of their use;
- Q. funeral parlors or these type of services;
- R. weapons or products imitating real weapons;
- S. political organizations and associations of political nature;
- T. pornography or other products, communications or contents of an intimate or sexual nature, which are intended for use by adults;

### **III. RULES APPLIED FOR SPONSORING**

#### **1. GENERAL RULES**

- A. The main aim of sponsoring is construction, support or strengthening awareness, image or presence of sponsor or specific sponsors’ products or services by clear indication of sponsor by voice-over or in the visual form e.g.:
  - a. “XY invites everyone to watch YY program”;
  - b. “YY is sponsored by XY”;
  - c. “This program is sponsored by XY”;
  - d. “Awards in competition are founded by XY, program sponsor”;
  - e. “XY would like to invite you to YY”;
  - f. “XY, producer of AA mineral water, would like to invite you to watch YY program”;
  - g. “This program is sponsored by XX yogurt”;
  - h. “This program is sponsored by XX yogurt, the main sponsor of the National Football Team”;
  - i. “This program is sponsored by XX, the winner in the rating of the best internet accounts in 2010”;
  - j. “This program is sponsored by Philips Company. Philips, Let’s make things better”.
- A. Sponsor must put pressure on the fact that sponsoring is not a form of advertisement or promotion and these parts cannot be dominant in the message.
- B. If the voice-over does not mention the word “sponsor”, it must be mentioned in a text form. Moreover,
- C. A producer, brand or product may be a sponsor.
- D. Sponsors’ billboard should be clearly distinguished from advertisement and should not be identical with an advertisement or quasi-commercial. It cannot contain any advertisement communications or calls for actions and in particular its contents cannot call to purchase or renting the sponsors’ or third partys’ products or services or refer in a special manner to such products and services.

- E. Sponsors' billboard must be clearly separated from the programs and it should not contain animation, music, graphics or lectors from sponsored programs Licensing product, which are not food products may sponsor programs of which have a license on condition mentioned above (point. E, Chapter III).
- F. Indication of sponsor may contain only the sponsors' name, company, trademark or other marks individualizing the company or its activity, view of product or service but on condition that it is not an extensive exposition.
- G. Indication of sponsor cannot contain in particular: price; comparison with other product, service or brand; encouragement to visit, purchase or consume product, creative material presenting consumer before, during or after consumption of the product; sales information or phone number.
- H. To avoid extensive exposition, adequate steps should be taken to ensure that references to products or services do not overshadow the communication on sponsoring.
- I. It is permissible to contain basic, minimal contact data on the condition that they do not invite and encourage viewers to contact sponsor e.g.:
  - a. "This program is sponsored by XY company www.xy.pl";
  - b. "This program is sponsored by XY company Teletext 566".
- J. It is permissible to include obligatory price information on condition that it does not constitute an advertisement communication. Any non-obligatory price information is recognized as an advertisement communication on standard basis and is not acceptable.
- K. Standard broadcasting process of all sponsoring materials contains necessity of obtaining acceptance by legal department, brand protection department and marketing department with regard to their compliance with the following provisions, legal provisions regulating advertising activity and guidelines containing Disney brand protection.
- L. Conditional broadcasting process for all sponsoring materials requires acceptance of all above mentioned departments and detailed analysis of both creative materials and business justification of such projects and therefore it is recommended to consult such initiatives at least 4 weeks ahead.

## **2. PLACEMENT REQUIREMENTS**

- A. Should not contain content or characters from the programme being sponsored – the same placement restrictions apply as for advertising.

## **3. SPONSORING BY TOYS PRODUCERS AND DISTRIBUTORS**

- A. Toys producers or distributors as sponsors will be approved by TWDC each time.

## **4. SPONSORING BY FOOD PRODUCERS**

- A. Food producers interested with sponsoring at TWDC channels must be checked with TWDC and Ofcom nutrition calculator with regard to their nutritional values and comply with the nutrition criteria which is annexed to the Broadcasters Agreement. In order to verify compliance of food products with these

criteria, the advertiser is required to provide a scan product labels and a completed Nutrition Profile Certificate attached to this document.

B. Currently, the following categories of food products are identified:

- a. Main course;
- b. Starters;
- c. Snacks;
- d. Cereals;
- e. Spices;
- f. Bread;
- g. Milk products (milk and cheese);
- h. Yogurts;
- i. Juice;
- j. Drinks;
- k. Nectars;
- l. Tea;
- m. Sweets (not permitted for sponsoring);

C. Due to strict healthy requirements concerning this category and necessity of detailed check of nutrient composition with TWDC and Ofcom nutrition calculator and with the nutrition criteria, it is recommended to ensure consultation with company responsible for sales of advertising time or TWDC each time with regard to sponsoring possibilities.

## **5. SPONSORING BY FILM PREMIERES AND VIDEO GAMES DISTRIBUTORS**

- A. Films and video games distributors as sponsors will be approved by TWDC each time.
- B. A general rule is that films and games forbidden for children and teenagers cannot be sponsors.

## **6. SPONSORING BY THE FOLLOWING PRODUCTS CATEGORIES OR PRODUCERS IS FORBIDDEN:**

- A. listed in a ban on advertising (point 15)
- B. dangerous for children or containing warnings such as "Keep away from children";
- C. for women such as pads and tampons;
- D. food or drinks specified by TWDC nutrition calculator or legal provisions as high fat, salt or sugar (HFSS) products;
- E. some investment, financial products and banking services;
- F. phone services with high rates;
- G. some out-work projects;
- H. some training courses.

#### IV. SUMMARY

The following table presents basic information on possibility of commercial presence (advertising or sponsoring) in TWDC channels. Individual product categories were initially qualified as Permitted, which means that they are subject to standard procedure for acceptance of creative material on condition that requirements from this document and guidelines of Disney brand are met. Categories Conditionally permitted require detailed analysis and business justification of such initiative.

<b>PRODUCTS CATEGORY</b>	<b>ADVERTISING</b>	<b>SPONSORING</b>
Air fresheners	Permitted	Conditional
Diapers	Permitted	Not permitted
Food for children	Conditional	Conditional
Banking and finance	Permitted	Conditional
Cosmetics	Permitted	Conditional
Charity organizations	Conditional	Conditional
Chewing gums	Conditional	Conditional
Detergents and cleaning products	Permitted	Conditional
Food and drinks products	Conditional	Conditional
Fast food restaurants	Not Permitted	Not Permitted
Others restaurants	Permitted	Not permitted
Insurance companies	Permitted	Conditional
Military and military toys	Conditional	Conditional
Mobile networks operators	Permitted	Conditional
Personal care products	Conditional	Conditional
Petrol stations	Permitted	Conditional
Drug stores	Not permitted	Not permitted
Toilet paper	Conditional	Conditional
Vitamins, dietary supplements, drugs	Not permitted	Not permitted
Cars and automotive industry	Permitted	Conditional
Photo cameras and other products of such type	Permitted	Conditional
Products for babies	Permitted	Not permitted
Sweets	Not Permitted	Not permitted