

Policy on the Advertising of Hemp-Derived Products and Related Businesses (Updated June 2025)

The Minnesota Star Tribune's policy for advertising of hemp-derived products containing CBD and THC, as well as related businesses, has been established to ensure compliance with the 2024 version of Minnesota State Statute § 342.64, which regulates advertisements for cannabis flower, cannabis products, lower-potency hemp edibles, and hemp-derived consumer products, and related businesses. The purpose of this policy is to provide standards and guidelines when accepting advertisements for hemp-based products and related businesses only.¹ By adhering to this advertising policy, the Star Tribune aims to ensure responsible advertising of allowable CBD and THC products and maintain compliance with all applicable federal, state, and local laws and regulations. Compliance with this policy is a requirement and is essential to maintain our integrity and protect the interests of consumers. This policy will be reviewed and amended as necessary to reflect changes in laws, regulations, or industry standards.

General Rules and Requirements.

- The Star Tribune will establish and follow a review process for all advertisements promoting CBD and THC products to ensure compliance with this policy. The Star Tribune intends to enforce this policy consistently and take appropriate action against advertisers that violate these guidelines. This may include rejecting advertisements, requesting changes, suspending advertising campaigns and/or privileges, or terminating partnerships with offenders.
- 2. Advertisers must submit their advertisements for review prior to publication and must sign all required documents.
- 3. Star Tribune reserves the right to reject any advertisement that we feel does not meet the requirements outlined in this policy, as well as our general advertising standards.
- 4. Advertisements are not accepted until they are published, which is at the Star Tribune's discretion.
- 5. Regardless of whether the Star Tribune has accepted any advertisement, the Advertiser and any involved advertising agency are ultimately responsible for the content of each Advertisement and for compliance with applicable laws and regulations.

Procedural Requirements. All hemp-derived CBD and THC product ads, both print and digital, must meet the following procedural requirements prior to publication:

- 1. The Advertiser and each involved advertising agency must complete and submit a Hemp-Derived Products Advertising Application form, which includes an obligation to comply with applicable laws and to indemnify the Star Tribune.
- 2. Each ad must be reviewed and approved for publication by the Policy Desk (which may require further review up to and including review by the Publisher).
- 3. In situations where we have special concerns about the advertising, we may require advertisers to sign additional documents, including an indemnification agreement in a form approved by the Star Tribune's legal department.
- 4. Deadlines for CBD and THC ads are advanced 24 hours from regular publication deadlines.

Content and Positioning Requirements. All hemp-derived product ads, both print and digital, must also meet the following requirements:

1. The ad must include name of the responsible entity for ad content by name, address, phone number, and URL. URL may be used in lieu of address if mailing address is on the website;

¹ Under Federal law, the Star Tribune cannot accept advertisements relating to the sale or distribution of marijuana, any products derived from marijuana, or other Schedule 1 Controlled Substances. Additional restrictions apply to advertising by health care practitioners, which are not covered under this policy.



- 2. The ad must not be placed adjacent to or in any publication, product, or position with expected underage readership. (For example: Hemp-derived CBD and THC product ads will not be allowed on or next to the Comics or Prep Sports. Ad positioning will be reviewed by Policy.).
- 3. Any hemp-derived product ads appearing in close proximity (e.g., on the same print or digital page) to liquor ads must be reviewed by Policy.
- 4. Digital ads may not include unsolicited pop-ups.

Advertising Review Guidelines. Advertisements for hemp-derived products and related businesses must:

1. Comply with all applicable federal, state, and local laws and regulations.

Advertisers must certify that they are properly registered with the State of Minnesota and that their advertisements meet the requirements outlined in Minnesota State Statute § 342.64, which permits certain advertising of hemp-derived CBD and/or THC products with a concentration of 0.3% or less. Any advertised product must comply with all legal limits on THC concentration, and all legally required testing, labeling, and packaging requirements. Any advertisement must include all warnings, disclosures, and disclaimers required by state or Federal law. (At the time this Policy was released, the Minnesota Office of Cannabis Management did not require any specific disclosures or warnings relating to advertising of hemp-derived products.)

2. Comply with all age-related legal restrictions.

<u>Images</u>. No advertisement may contain any image (i) depicting a person under the age of 21 consuming CBD or THC products, or (ii) that is designed or likely to appeal to persons under the age of 21 or (iii) that encourages consumption of CBD or THC products by persons under the age of 21.

<u>Targeted Advertising</u>. No advertisement may be targeted at persons who are not of legal age to purchase and consume CBD or THC products. In accordance with Minnesota law, Star Tribune will not run ads for CBD or THC products in any publication where 30 percent or more of the audience is reasonably expected to be under 21 years old. For any directed, individualized communications, Star Tribune must implement or require the advertiser to implement measures to verify the age of their audience and ensure that advertisements are not targeted toward persons under 21 years of age. Allowable methods of verification include user confirmation, birth date disclosure, or another similar registration method.

Additional concerns relating to ad content that could appeal to children:

- Any resemblance to or use of cartoon-like characteristics of a real or fictional person, animal, or fruit that appeals to children
- Any resemblance to brand-named products marketed to children
- Any connection to commercially available candy or snack food item, including any resemblance to trademarked, characteristic, or product-specialized packaging
- 3. Not contain an image of alcohol or a person or persons consuming alcohol in the same advertisement.

4. Not make unsubstantiated health claims.

Advertisements must not include any health claims, medical claims, or claims pertaining to disease mitigation or cure or promote CBD and THC products as a cure or treatment for any medical condition unless supported by credible scientific evidence. Star Tribune reserves the right to require advertisers to provide scientific evidence supporting any health claims made in advertisements.

5. Not be misleading in any way.

Star Tribune reserves the right to refuse any advertising that it believes contains false statements or is misleading or deceptive in any way, including any statement, artwork or design that could mislead a reasonable viewer to believe that the advertised product contains anything other than an edible hemp-based cannabinoid product. Star Tribune reserves the right to require the advertiser to provide reasonable substantiation for any statements or claims.

6. Follow laws and current industry best practices regarding consumer disclosures and warnings.

Examples could include the concentration of CBD and THC in the product, the source of the cannabinoids, and any potential risks or side effects associated with consumption, especially when consumed with alcohol or other substances.

7. Not contain content promoting illegal activities or violating community standards.

Advertisements must not include any statement, photograph, or artwork that makes or infers a connection to marijuana or any other controlled substance. Advertisements must not depict the consumption of CBD and THC products in a manner that encourages overconsumption, consumption in combination with alcohol, or other irresponsible use or behavior.

ADVERTISING GUIDELINES QUICK CHECKLIST

Other questions and concerns? Consult the checklist below for a quick list of ad guidelines for hemp-derived CBD and THC product advertising. For any other questions regarding hemp-derived CBD and THC (or when in doubt) email: PolicyTeam@StarTribune.com.

- Client and any involved ad agency must complete and sign the Hemp Product Advertising Application before ads can be reviewed or approved.
- Each ad creative and placement submitted 24 hours before the usual deadlines for review and approval by Policy Team.
- All advertising must comply fully with Minnesota Statute 342.64. Advertising for businesses
 located outside of the State of Minnesota must also comply with any laws and regulations to
 which they are subject; compliance with which is the responsibility of the advertiser.
- Acceptable Ad Content:
 - Advertises a product containing hemp-derived THC, which has a concentration of 0.3% or lower (measured on a dry-weight basis)
 - o Contains no false, misleading or unverified claims about effects or benefits
 - Does not contain images of alcohol or alcohol product packaging, or anyone consuming alcohol
 - Does not use imagery of a person under 21
 - Does not use images that would appeal to an audience under 21, like cartoons, toys or animals
 - Contains any warning specified by the Office of Cannabis Management regarding impairment and health risks
 - Targeted to a Minnesota audience reasonably expected to be at least 70% 21+