

WHISTLEBLOWER POLICY

ACCESS TO NUTRITION FOUNDATION

July 2018



ACCESS TO
NUTRITION
INDEX™

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August 2018

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1. About the Access to Nutrition Foundation

The Access to Nutrition Global Index is published by the Access to Nutrition Foundation (ATNF), an independent non-profit organization based in the Netherlands, dedicated to objectively assessing and improving the contribution the private sector makes to addressing global nutrition challenges. The aim of ATNI is to encourage companies to both increase access to healthy products and also to responsibly exercise their influence on consumers' choice and behaviour.

The Access to Nutrition Global Index (ATNI) is the flagship product of ATNF. The ATNI is a ground-breaking global initiative that evaluates the largest food and beverage manufacturers on their policies and performances related to the world's most pressing nutrition challenges: obesity and undernutrition.

The ATNI rate the world's largest food and beverage manufacturers. By regularly scoring and ranking these companies' nutrition-related commitments, practices and disclosure on a global basis, ATNI aims to encourage them to:

- Increase consumers' access to nutritious and affordable foods and beverages by improving product formulation, and addressing pricing and distribution; and
- Responsibly exercise their influence on consumer choice and behaviour through responsible marketing, labelling, lobbying and engagement, and promoting healthy diets and active lifestyles.

In addition to the ATNI, ATNF developed the concept of Indexes on a country-level, Spotlight Indexes. The rationale for these Indexes is that while the Global ATNI provides the basis for discussion on the role of private sector in tackling obesity and undernutrition on a global basis, to create dialogue and action on a country level, the assessment must be tailored to local requirements and to assess companies operating in that country. Moreover, Spotlight Indexes provide a way to test whether companies are in fact applying their global commitments by assessing their performance in individual markets.

Access to Nutrition Foundation Mission

The mission of ATNF is to encourage companies to both increase access to healthy products and also to responsibly exercise their influence on consumers' choice and behaviour.

2. Purpose of Whistleblower Policy

The purpose of this policy is to encourage employees, board members, consultants and other stakeholders to raise any serious concerns they may have about the way in which the ATNF is run or about the conduct of those involved running it. ATNF wishes to find out if malpractice or unlawful activity exists within ATNF so that it can be dealt with appropriately.

The Whistleblower Policy applies to all ATNF Board members, employees, consultants and everyone with a working relationship with ATNF.

3. General Principles

The Code of Conduct and Ethics Policy ("Code") of the Access to Nutrition Foundation (the "Foundation") requires Board members, employees, consultants and other stakeholders who have

a working relationship with ATNF to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ATNF, ATNF practices honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

4. Reporting Responsibility

It is the responsibility of all Board members and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy. Other stakeholders are also encouraged to report violations and suspected violations of the Code of Conduct & Ethics policy in accordance with this policy.

5. No Retaliation

No Board members, employees, consultants and other stakeholders who in good faith report any action or suspected action taken by or within ATNF that is illegal, fraudulent or in violation of the Code or any other adopted policy of ATNF shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within ATNF prior to seeking resolution outside ATNF.

6. Reporting Violations

The Code addresses ATNF's open door policy and suggests that all personnel, board members, consultants and other stakeholders share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. Supervisors are required to report any violation or suspected violation of law, the Code or any other adopted policy of ATNF to the Executive Director. If the issue is not resolved properly the supervisor will report to ATNF's board-appointed Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. In the case of any violation or suspected violation of law, the Code or any other adopted policy of ATNF, or if someone is not satisfied or uncomfortable with following ATNF's open door policy, ATNF's Compliance Officer should be contacted directly.

There are two ways to contact the ATNF Compliance Officer, Mr. Paulus M. Verschuren:

a) via email at paulusmverschuren@gmail.com or b) should you prefer your suspicion or grievance to remain anonymous, through an unsigned letter, C/o Compliance Officer, ATNF, Arthur van Schendelstraat 500, 3511 MH Utrecht.

7. Compliance Officer

The Board appoints on a Compliance Officer within the Board for a two-year term by voting. The Compliance Officer is responsible for administering this Whistleblower Policy and investigating and resolving all reported complaints. This includes clauses around safeguarding and allegations concerning any violation or suspected violation of law the Code or any other adopted policy of

ATNF and, at his discretion, shall advise the chairman or the Executive Director. The Compliance Officer shall report to the Board.

8. Acting in Good Faith

Anyone filing a complaint concerning any violation or suspected violation of law, the Code or any other adopted policy of ATNF must be acting in good faith and have reasonable grounds for believing the information disclosed indicates such a violation or suspected violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

9. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and comply with applicable law.

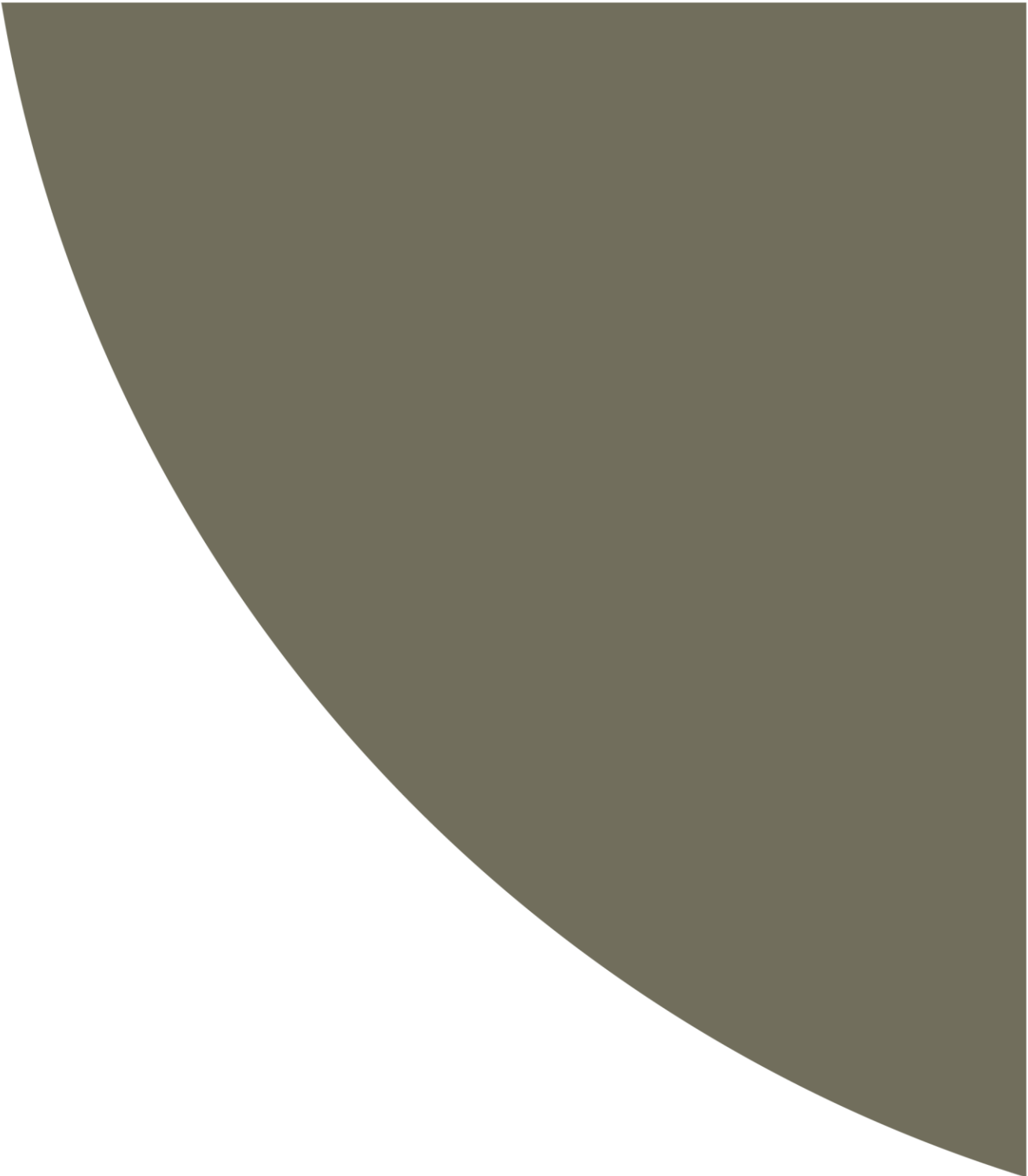
10. Handling of Reported Violations

The Compliance Officer shall notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

11. Distribution of the Whistleblower Policy

A copy of this Whistleblower Policy will be distributed to all board members, employees, consultants and other stakeholders who have a contractual relationship with ATNF. The Policy will be publicly available on ATNF's website.

Adopted by ATNF's Board meeting at a meeting on May 18 2017 and effective on June 1 2017.



Access to Nutrition Foundation

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