# ATNI INDIA SPOTLIGHT INDEX 2016

# **METHODOLOGY**

April 2016



# **ATNI INDIA SPOTLIGHT INDEX 2016**

**METHODOLOGY** 

# Contents

Contents			
Introdu	ction	4	
Methodolo	gy structure	5	
Category A	Corporate strategy, management and governance	7	
Category B	Formulating appropriate products	7	
Category C	Delivering affordable, accessible products	7	
Category D	Responsible marketing policies, compliance and spending	8	
Category E	Supporting healthy diets and active lifestyles	8	
Category F	Product labelling and use of health and nutrition claims	9	
Category G	Influencing governments and policymakers, and stakeholder engagement	9	
ATNI In	dia Spotlight Index Methodology 2016	10	
Section 1 -	Nutrition governance and management	10	
Category A	Corporate strategy, management and governance	10	
Section 2 -	Formulating and delivering appropriate, affordable, accessible products	14	
Category B	Formulating appropriate products	14	
Section 3 -	Influencing consumer choice and behaviour	21	
Category D	Responsible marketing policies, compliance and spending	21	
Category E	Supporting healthy diets and active lifestyles	26	
Category F	Product labelling and use of health and nutrition claims	29	
Category G	Influencing governments and policymakers, and stakeholder engagement	31	
Append	ix I Organisations consulted	33	
	ix II ATNI Expert Group	34	
• •	·		
Append	Appendix III General Definitions		
		36	

# Introduction

This document sets out the methodology for the first India Spotlight Index launched in December 2016. The India Spotlight Index is developed and published by the Access to Nutrition Foundation (ATNF), a not-for-profit organization based in The Netherlands. By providing food and beverage manufacturers with a tool to benchmark their nutrition practices and serve as an impartial source of information for interested stakeholders, ATNF aims to encourage these companies to increase consumers' access to nutritious products and responsibly exercise their influence on consumer choice and behavior.

The India Spotlight Index is modeled on The Global Access to Nutrition Index, which was initially developed over a three-year period through extensive, multi-stakeholder consultation with companies, governments, international organizations, civil society, academia, and investors. It was also guided by advice from an independent, multi-stakeholder advisory panel and a group of international experts on nutrition, including Dr. Pandav and Dr. Yadav from the All India Institute of Medical Sciences (AIIMS). ATNF is fully independent and is funded by Bill and Melinda Gates Foundation, the Wellcome Trust and the Children's Investment Fund Foundation (CIFF). ATNF is also pleased to have the support of 50 of major institutional investors with US\$3.5 trillion under management. The first Global Index was published in 2013 and the second in January 2016. The latter Index ranked the world's largest 22 global F&B manufacturers nutrition policies, practices and disclosure. For more information, see www.accesstonutrition.org

In addition to the Global Index, assessing the world's largest food and beverage manufacturers, ATNF conducted research in 2012 in South Africa, Mexico and India to determine whether similar Indexes could be published for these countries. These pilots assessed whether ATNI's methodology was appropriate to these countries, with adjustments made for the local context, and researched the 10 largest F&B manufacturers in each country, consisting of a mix of multinational and local companies. In addition, product profiling exercises were also conducted which assessed the nutritional quality of c.50% of the products sold by the 10 companies in each country.

After piloting the India Spotlight Index in 2012-2013, the Access to Nutrition Foundation (ATNF) consulted extensively with stakeholders on how the India Spotlight Index could be applied to the Indian context. Various companies, industry associations (CII and FICCI), civil-society organisations, academia and policymakers were involved through round-tables, meetings and one-on-one consultations (see the full list in Annex I). The ATNF Expert Group, again, provided advice on all aspects of the methodology (see Appendix II for the list of members of the Expert Group).

The consensus was that an India Spotlight Index would be an appropriate and valuable tool for companies and others in India. The decision was therefore made to develop and publish an India Spotlight Index. It will assess the 10 largest food and beverage manufacturers based on Indian revenues in FY2014 (using Euromonitor data): Gujarat Cooperative Milk Marketing Federation (Amul), Britannia Industries, Coca-Cola India, Mondelez India, Mother Dairy Fruit & Vegetable Pvt Ltd. (Mother Dairy), Nestlé India, Parle Products Pvt. Ltd. (Parle Products), PepsiCo India, Ruchi Soya Industries Limited (Ruchi Soya) and Hindustan Unilever. In addition, four more companies (Adani Wilmar Ltd. (Adani), Cargill India Pvt. Ltd. (Cargill), ITC Limited (ITC) and Karnataka Cooperative Milk Producers' Federation Ltd. (Nandini)) that make and fortify dairy, oil and/or wheat will be assessed on a specific separate set of indicators focused only on their fortification

activities. The purpose is to learn more about what these companies are doing to fortify these staples and disseminate that knowledge. These four will not be ranked.

As with the Global Index, Sustainalytics, a responsible investment firm that specialises in analysis of companies on environmental, social and governance issues has been contracted by ATNF to do the data collection and analysis.

# Methodology structure

To retain comparability with the Global Index, the overall structure and weighting of the India Spotlight Index is the same. However, for this first iteration, the India Spotlight Index has fewer and simplified indicators (120 versus over 200) and certain India-specific questions have been added (e.g. concerning the use of the Corporate Social Responsibility levy and the food safety systems).

Similar to the Global Index the India ATNI methodology is organized into Sections, Categories, Criteria and Indicators:

- Sections: Three sections covering companies: i) nutrition governance and management, ii) approach to formulating and delivering appropriate, affordable, accessible products, and iii) influencing consumer choice and behavior.
- Categories: Seven broad categories (A-G) relevant to companies' nutrition-related practices.
- **Criteria:** More detailed criteria within each of the Categories (20 in total).
- **Indicators:** Performance indicators within each Criterion on which companies are scored. There are three types of indicator: those related to companies' commitments, practices and disclosure.

The majority of the Indicators assess companies' practices related to promoting good nutrition for all, while others assess additional actions companies are taking to prevent and address undernutrition – which will account for approximately 25% of the overall Index score. If a company cannot make fortified products or use fortified ingredients it is not assessed on specific undernutrition fortification indicators.

The methodology is based, to the extent possible, on existing (international) standards, guidelines and frameworks, such as those developed by the WHO, Codex, Indian labeling regulation, IFBA marketing pledges and other leading nutrition-focused organizations.

**Table 1 India Spotlight Index Methodology Overview** 

Category (weight in total score)	Description	Criteria		
Section1: Nutrition governance and management				
<b>A</b> (12.5%)		<b>A1</b> Corporate nutrition strategy*		
	Corporate strategy, management and governance	<b>A2</b> Nutrition governance and management systems*		
		A3 Quality of reporting*		
Section 2: Formula	ating and delivering appropriate, af	fordable, accessible products		
<b>B</b> (25%)	Formulating appropriate products	<b>B1</b> Product formulation*		
		B2 Nutrient profiling system		
<b>C</b> (20%)	Delivering affordable, accessible	C1 Product pricing*		
	products	C2 Product distribution*		
Section 3: Influence	cing consumer choice and behavior			
<b>D</b> (20%)	Responsible marketing policies, compliance and spending	<b>D1</b> Responsible marketing policy: all consumers		
		<b>D2</b> Auditing and compliance with policy: all consumers		
		(D3 Spending: Advertising focus: all consumers*)		
		<b>D4</b> Responsible marketing policy: children		
		<b>D5</b> Auditing and compliance with policy: children		
		<b>(D6</b> Spending: Advertising focus (children) and policy impact*)		
<b>E</b> (2.5%)	Supporting healthy diets and active	<b>E1</b> Supporting staff health & wellness		
	lifestyles	<b>E2</b> Supporting breastfeeding mothers in the workplace		
		<b>E3</b> Supporting consumer-oriented healthy eating and active lifestyle programs*		
<b>F</b> (15%)	Product labeling and use of health	F1 Product labeling		
	and nutrition claims	F2 Health and nutrition claims		
<b>G</b> (5%)	Influencing governments and policymakers, and stakeholder engagement	<b>G1</b> Lobbying and influencing governments and policymakers*		
		G2 Stakeholder engagement*		

<sup>\*</sup> Criteria with additional undernutrition specific indicators \*\* D3 and D6 were not scored for the Global Index and are therefore excluded from the India Spotlight Index.

# **Category A** Corporate strategy, management and governance

A company can better sustain and scale up nutrition activities when a commitment to the issue starts at the top of the organization and is integrated into its core business strategy. Nutrition issues are then more likely to be prioritized as the company allocates resources, tracks performance and reports to its stakeholders.

This Category assesses the extent to which a company's corporate strategy includes a specific commitment to improving nutrition in general and under nutrition in particular, and whether its approach is embedded within its governance and management systems, such as through market research to assess the need/potential for addressing undernutrition through micronutrient fortification and/or the use of fortified ingredients/staples. The Category is evaluated using three Criteria:

**A1** Corporate nutrition strategy

A2 Nutrition governance and management systems

**A3** Quality of reporting

This Category carries 12.5% of the weight of the overall score.

# **Category B** Formulating appropriate products

Companies can help consumers make healthier choices by improving the nutritional quality of foods made available to them. This Category addresses companies' efforts to do so through research and development (R&D), new product formulation and reformulation of existing products, and tackling undernutrition through developing fortified products or use fortified ingredients for undernourished. It also assesses the quality of the nutrient profiling system that a company may use to guide its product formulation efforts.

This Category consists of two Criteria:

**B1** Product formulation

**B2** Nutrient profiling systems

This Category carries 25% of the weight of the overall score.

## **Category** C Delivering affordable, accessible products

Producing healthier options is a necessary but insufficient condition to improve consumer access to nutritious foods and beverages. Consumers also need to have access to these products. Companies should offer them at competitive prices and distribute them widely to offer consumers a 'level playing field' between healthy and less healthy options.

This Category assesses companies' efforts to make their healthy products more accessible through their approaches to pricing and distribution for consumers in general and for undernourished consumers in particular. It consists of two Criteria:

**C1** Product pricing

C2 Product distribution

This Category carries 20% of the weight of the overall score.

# **Category D** Responsible marketing policies, compliance and spending

This Category captures the extent to which companies support consumers in making healthy choices by adopting responsible marketing practices and by prioritizing the marketing of their healthier products.

The Category consists of two parallel groups of three Criteria:

#### **ALL CONSUMERS**

**D1** Responsible marketing policy **D2** Auditing and compliance with policy **(D3** Marketing focus)<sup>1</sup>

#### **CHILDREN**

**D4** Responsible marketing policy **D5** Auditing and compliance with policy **(D6** Marketing focus)

This Category carries 20% of the weight of the overall score.

# **Category E** Supporting healthy diets and active lifestyles

Companies can support healthy diets and active lifestyles for their own staff by providing employee health and wellness programs. In addition to other benefits, these programs can help facilitate a company culture that contributes to a greater focus on improving the company's nutrition practices. Supporting breastfeeding mothers through supportive working practices and by providing appropriate facilities is another way that companies can support those mothers to give their infants a healthy start to life. Companies can also help consumers to adopt healthy diets and active lifestyles through support for education programs including programs that target undernourished consumers.

This Category assesses the extent to which companies support such efforts through three Criteria:

- **E1** Staff health and wellness programs
- **E2** Supporting breastfeeding at work
- E3 Supporting consumer-oriented healthy diet and active lifestyle programs

This Category carries 2.5% of the weight of the overall score.

<sup>&</sup>lt;sup>1</sup> After the data collection phase of the Global Index research it was decided to make Criteria D3 and D6 unscored because indicators do not resonate with current practice and the companies do not keep this kind of information. These indicators are therefore excluded from the India Spotlight Index.

# **Category F** Product labelling and use of health and nutrition claims

One important means of promoting healthy diets, and addressing obesity and undernutrition, is to provide consumers with accurate, comprehensive and readily understandable information about the nutritional composition and potential health benefits of what they eat. This can promote better nutrition by helping consumers choose appropriate products to manage their weight and help to prevent or address diet-related chronic disease, as well as raise awareness of products that will address micronutrient deficiencies.

This Category assesses companies' approaches to product labelling and use of health and nutrition claims, particularly with respect to the consistency of their application across product portfolios in accordance with local and international standards (CODEX). This assessment is divided into two Criteria:

**F1** Product labelling<sup>2</sup>

F2 Health and nutrition claims

This Category carries 15% of the weight of the overall score.

# Category G Influencing governments and policymakers, and stakeholder engagement

Companies can have an impact on consumers' access to nutrition by engaging with political parties, policymakers and policymaking bodies through lobbying activities, political contributions and positions on nutrition policies. In addition, constructive engagement by companies with a wide range of other stakeholders (including international organizations, civil society, and academics) can help to inform companies' approaches to nutrition.

This Category focuses on companies' engagement with stakeholders on corporate nutrition practices and nutrition-related issues. Companies are assessed under two Criteria:

**G1** Lobbying and influencing governments and policymakers

**G2** Stakeholder engagement

This Category carries 5% of the weight of the overall score.

<sup>&</sup>lt;sup>2</sup> As part of the assessment two indicators will be scored based on the outcomes of the product-profiling exercise that will be done by the George Institute simultaneously with the Index methodology. The product-profiling exercise will assess nutrient contents of products available in Indian supermarkets based on preselected Nutrient-Profiling Systems as well as against Indian and Codex regulation for labelling.

# ATNI India Spotlight Index Methodology 2016



## **Healthy multiplier**

A healthy multiplier is applied to any scores for commitments or performance indicators relating to 'healthy' products. The multiplier is derived from the company's score on Category B2 (but is not the actual score) and ranges between 1 (no multiplier) and 2 (for companies that score more than 75% on B2).

More general terms and definitions can be found in **Appendix III General definitions List.** Additionally, explanations of specific indicators are provided on the data collection platform.

# **Section 1 - Nutrition governance and management**

Category A Corporate strategy, management and governance				
A1 Corp	A1 Corporate nutrition strategy			
No. II <sup>3</sup>	No. GI	Nutrition		
		Commitments		
1	1	Does the company have a clear commitment to, and strategic focus on, health and nutrition, articulated in its mission statement and/or strategic commitments?	Mission statement mentions health and/or nutrition AND company states a strategic commitment to grow through a focus on health and nutrition	
			Either the mission statement mentions health and/or nutrition, or a strategic commitment to grow through a focus on health and nutrition	
			No clear focus on health and/or nutrition in mission statement or growth strategy	
2	2	Has the company stated a commitment to	Yes, and with explicit reference to low-income populations	
		deliver more, healthy foods, and made a specific	Yes, but with no explicit reference to low-income populations	
		reference to low-income populations?	Commitment under development	
			No commitment or no such statement	
3	3.1	Does the company recognise it has a role to play in tackling India's challenges of increasing	Yes	
		levels of obesity and diet-related chronic diseases?	No or no information	
		Performance		
<b>4</b> ♡	8	What percentage of the company's total Indian value of sales in FY 2014 did healthy products account for (according to company's definition of healthy)?		
		Disclosure		

<sup>&</sup>lt;sup>3</sup> No II refers to the indicator number in the India Spotlight Index (II) while No GI refers to the corresponding indicator number in the Global Index (GI).

	10	Does the company disclose: (Tick all that apply)	A clear statement that its growth strategy is based on an increasing focus on nutrition  A commitment to deliver more, healthy foods, and made a specific reference to low-income populations  A statement in which the company recognises it has a role to play in tackling Indian challenges of increasing levels of obesity and diet-related chronic diseases  Quantitative info on the company's total Indian value of sales in FY 2014 (according to company's definition of healthy)  None or not disclosed
No. II	No. GI	Undernutrition	
		Commitments	
6	11	Does the company commit to playing a role in combating undernutrition in India?	Yes No or no information
		Performance	
7	12	Has the company undertaken a strategic review of the commercial opportunities available to it in addressing undernutrition/developing products	Yes, reviewed by the Board Yes, but not reviewed at Board level
		for the undernourished in India and at what level of the company was this reviewed?	No strategic review/ no evidence
0	16	Disclosure	A close commitment to trading and demantication
8	16	Does the company disclose: (Tick all that apply)	A clear commitment to tackling undernutrition
			A statement about having undertaken a strategic review
			Conclusions of the strategic review
		ernance and management systems	
No. II	No. GI	Nutrition	
1	1	Commitments  Does the company have a Board- approved	Comprehensive including objectives
_	_	'nutrition strategy' or 'nutrition policy' (including	Limited without objectives
		objectives) related to delivering better	Under development
		nutrition?	None of these
		Performance	
2	3 & 5	To whom has the company (what function) assigned top-level oversight for implementing	CEO or an Executive that reports directly to the Board
		the company's India nutrition strategy and/or	A committee that reports to the Board, e.g. Sustainability  Committee
		programs?	Senior manager one level below Executive
			Another less senior staff member
			No information
3	6	Is the company's nutrition plan/strategy delivery	Ves standard internal audit and annual management review
3	6	Is the company's nutrition plan/strategy delivery subject to standard internal audit and annual	Yes, standard internal audit and annual management review
3	6		Either standard internal audit or annual management review but not both
3	6	subject to standard internal audit and annual	Either standard internal audit or annual management review but
3	6 NEW	subject to standard internal audit and annual management review?  Has the company obtained ISO 22000:2005 certification which specifies requirements for a	Either standard internal audit or annual management review but not both
		subject to standard internal audit and annual management review?  Has the company obtained ISO 22000:2005 certification which specifies requirements for a food safety management system or has it been accredited by another recognised quality assurance body for food safety?	Either standard internal audit or annual management review but not both  To none of them or no information
		subject to standard internal audit and annual management review?  Has the company obtained ISO 22000:2005 certification which specifies requirements for a food safety management system or has it been accredited by another recognised quality	Either standard internal audit or annual management review but not both  To none of them or no information  Yes

			Accountability for nutrition strategy
			Accountability for fluction strategy
			Results of audit or management review
			ISO 22000:2005 certification on food safety management systems or similar certification?
No. II	No. GI	Undernutrition	
		Commitments	
6	9	Has the company formally set out how it intends to address undernutrition and micronutrient	Yes
		deficiencies (specifically one or more of iron,	No or no information
		iodine, zinc, vitamin A, vitamin D, vitamin B12) through its commercial strategy?	Not applicable
7	10	Has the company committed to dedicating some of its (obligatory) CSR budget to address	Yes
		undernutrition?	No or no information
			Not applicable
		Performance	
8	16	Has the company done market research or wider studies to assess the need/potential for	In more than 5 Indian states
		addressing undernutrition (through micronutrient fortification and/or the use of	In 1-4 Indian states
		fortified ingredients/staples)	No or no information
9	17	Is the company's commercial approach to addressing undernutrition and micronutrient deficiencies through product fortification in India:	Strategic and well-structured, with a commercial strategy being
			implemented in many states  Ad hoc with programs in only a few states
			ha noe man programs in only a few states
			None articulated
10	18	Is the company's non-commercial approach to addressing undernutrition and micronutrient deficiencies through product fortification in India:	Strategic and well-structured, with a strategy being implemented in many states
			Ad hoc with programs in only a few states
			None articulated
11	19	To whom has the company (what function) assigned top-level oversight for its commercial strategy/program to address undernutrition?	CEO or an Executive that reports directly to the Board
			A committee that reports to the Board, e.g. Sustainability Committee
			Senior manager one level below Executive
			Another less senior staff member
			No information
Not	22	Does the company have partnerships with, or	GAIN
scored		formally support any of the following initiatives to address undernutrition in India? (Tick all that	Micronutrient Initiative
		apply) (For information only, not scored)	ICDS National Mid-day Meal Scheme
			TATA Trust
			Indian Food Banking Network
			Other

		Disclosure	
12	23	Does the company publish: (Tick all that apply)	Commitment/strategy for addressing undernutrition commercially Commitment/approach to dedicating some of its (obligatory) CSR budget to address undernutrition Market studies Managerial arrangements
			Managenar arrangements
A3 Qual	ity of rep	prting	
No. II	No. GI	Nutrition	
		Performance	
1	1	Does the company publish formal, regular reports on its approach to tackling nutrition issues in India, and how often?	Annually (i.e. the company has an annual reporting cycle) Less frequently than annually No reporting
2	2	The company's reporting on preventing and addressing obesity and diet-related chronic diseases in India includes: (Tick all that apply)	A clear sense of the company's nutrition strategy in India and how it relates to overall business strategy  Clear reporting against all objectives and targets for India
			clear reporting against all objectives and targets for India
			A clear outlook on future plans and targets for India
			Explanation of the challenges faced, not only success/positive stories
			None / not relevant
No. II	No. GI	Undernutrition	
		Performance	
3	7	What types of commentary does the company's reporting provide on its work to tackle undernutrition in India?	An extensive commentary on its work to prevent and address undernutrition including information about those reached, the impact of programs
			A limited commentary on its work to prevent and address undernutrition
			No reporting on undernutrition
4	8	<b>8</b> What does the reporting provide?	A clear sense of the company's undernutrition strategy in India and how it related to overall business strategy  Clear reporting against all undernutrition-related objectives and targets for India
			A clear outlook on future plans and targets on undernutrition for India
			Explanation of the challenges for India, not only success/positive stories
			None / not relevant

# Section 2 - Formulating and delivering appropriate, affordable, accessible products

**Category B** Formulating appropriate products

B1 Product formulation <sup>4</sup>			
No. II	No. GI	Nutrition	
		Commitment	
1	1	Has the company made any commitments to invest	Yes
		(or continue to invest) in R&D to improve the	No or no information
_	-	nutritional quality of its products in India?	
2	6	Salt/sodium targets	
2.1	6.1	Has the company set a target to reduce levels of salt/sodium and, if so, in how many products or	The company has set a target to reduce levels of salt/sodium in all relevant products/sub-categories
		sub-categories?	The company has set a target to reduce levels of salt/sodium in some relevant products/sub-categories
			No salt target
			Not applicable (explain)
2.2	6.2	Baseline and target year	The company has specified a baseline year from which the reductions will be made
			The company has set a target year by when the reductions will be made
3	7	Transfat targets	
3.1 7.1	7.1	Has the company set a target to reduce transfat that aligns to WHO recommendation of less than 1% of energy in a product being provided by transfat originating from partially hydrogenated vegetable oil in products?	Target aligns to WHO recommendation of less than 1% of energy in a product being provided by transfat originating from partially hydrogenated vegetable oil in products  Target does not align to WHO recommendation or no target
			Not applicable (explain)
3.2	7.2	Baseline and target year	The company has specified a baseline year from which the reductions will be made
			The company has set a target year by when the reductions will be made
4	8	Saturated fats targets	
4.1	8.1	Has the company set a target to reduce/reach lower levels of saturated fats and, if so, in how many products or sub-categories?	The company has set a target to reduce/reach lower levels of saturated fats for all relevant products/sub-categories  The company has set a target to reduce/reach lower levels of saturated fats for some relevant products/sub-categories  The company has not set a target  N/A - the company sets targets to reduce calories instead of

<sup>&</sup>lt;sup>4</sup> This Criterion asks questions about nutrients. If a nutrient is not relevant for a company related questions will be made not applicable.

4.2	8.2	Baseline and target year	The company has specified a baseline year from which the reductions will be made
			The company has set a target year by when the reductions will be made
5	9	Added sugars targets	
5.1	9.1	Has the company set a target to reduce/reach lower levels of added sugars and, if so, in how many products/sub-categories?	The company has set a target to reduce levels of added sugars for all relevant products/sub-categories  The company has set a target for levels of added sugars for some relevant products/sub-categories  No sugar target
			N/A - the company sets targets to reduce calories instead of added sugars
		If N/A	The company has set a target to reduce calories or reach a lower level of calories across all relevant products/subcategories
			The company has set a target to reduce calories or reach a lower level of calories for only some products/sub-categories No calories target
5.2	9.2	Baseline and target year	The company has specified a baseline year from which the reductions will be made
			The company has set a target year by when the reductions will be made
		Performance	
<b>6</b> ♡	<b>15</b> ♡	Can the company provide evidence of having introduced new healthy products in the last three years?	Consolidated data on the number of new products launched  Some examples but no consolidated data for products launched
			No products
7	25	Company's products that meet 'composite healthy standard'.	
7.1 ♡	<del>25,1</del>	Percentage of company's products that met its 'composite healthy standard' by 2014 in India	
7.2 ♡	25.2 ♡	By what percentage has the number of products that meet the company's 'composite healthy standard' increased between 2012 and 2014 in India?	
<b>8</b> ♡	<b>26</b>	What percentage (by number of products) of your portfolio meet the standard to be advertised to children under 12 in 2014 (according to own NPS) <b>Disclosure</b>	
9	30-35	Does the company publish its: (Tick all that apply)	Nutrition R&D investments commitments
			Targets on key nutrients (all)
			The number of new healthy products launched
			The percentage of products that meet its composite healthy standards
			The percentage of its healthy products that can be marketed to children

No. II	No. GI	Undernutrition	
		Commitment	
10	38	Has the company committed to basing its approach to fortification on international guidance on	Yes
		fortification (i.e. CODEX CAC/GL 07-1987) and related, equivalent guidance that reflects	No or no information
		international agreement on best practice and/or national interpretation of those standards?	Not applicable
11a	39	Has the company committed to seek to use ingredients with high inherent levels of	Yes
		micronutrients (incl. fortified ingredients), where relevant?	No or no information
11b	NEW	Has the company committed to increasing protein levels in relevant products?	Yes No
12	40	Has the company committed to fortifying only products of high underlying nutritional quality?	Yes No
13	41	Has the company committed to tackle undernutrition and micronutrient deficiencies	Yes
		through initiatives that aim to increase the number/volume of fortified foods available to	No
		undernourished populations?	
		Performance	
14	44	Has the company developed fortified products in	Women of childbearing age
		the last 2 years in India aimed at: (Tick the two	Children between 2-5
		most relevant)	Children over 6
			Other population groups
			None
Not scored	NEW	Does the company use fortified ingredients (non-scored)?	Double fortified salt
3COI EU		Scored):	Wheat flour
			Oil
			Milk
			Rice
			Not applicable
15	NEW	Does the company use fortified ingredients for:	All relevant products
			Some relevant products
			Not yet but plans to
			No or no information
			Not applicable
		Philanthropic programs	
16	45	Can the company provide evidence of funding	Women of childbearing age
		programs to deliver products specifically formulated	Children between 6-24 months
		or appropriate for specific undernourished groups in India: (Tick the two most relevant)	Children between 2-5
			Children over 6
			Other populations
		Disclosure	
17	47-48	Does the company publish: (Tick all that apply)	Commitments to tackle undernutrition and micronutrient deficiencies through targeted fortification of its products

			A commentary on developing fortified products for undernourished
			Commitment to fortify only products of high nutritional value
			Commitment to source fortified staples or ingredients
			A commentary on how the company has used fortified ingredients
18	49	Does the company publish, for its philanthropic/non-commercial programs: (Tick all that apply)	Evidence of funding programs to develop or deliver products specifically formulated or appropriate for the undernourished Description of population groups targeted by programs
			funded
B2 Nutr	ient profi	ing system	
No. II	No. GI	Nutrition	
		Performance	
Not	1	Does the company have an NPS? (For information	Yes
scored		only, i.e. not scored):	No or no information
Not scored		If yes:	
Not scored	1.1	Is this NPS used to guide new product development/reformulation?	Yes No or no information
Not	1.2	Is the NPS used to determine which products can	Yes
scored		be marketed to children?	No or no information
Not	1.3	Is the same system used for both purposes?	Yes
scored		,	No
1	2	In respect of the Nutrient Profiling System (NPS) that the company uses to guide new product development or reformulation, is that system:	A formal internal NP system (that calculates overall scores of ratings of the nutritional quality of its products) to guide its reformulation program
			A pre-cursor to a full NP system, e.g. a tool to assess levels of salt, fat, sugar etc. and rate them high, med, low or above or above or below a threshold, but which does not calculate overall nutritional quality
			No system
2	3	How did the company develop its NPS?	Adopted or adapted an existing NP system developed through an independent multi-stakeholder process
			Developed its own NP system with independent external input
			Developed its own NP system without independent external input/unclear whether independent external input was used
			No or no information
3	4	Which products and categories are covered by the	All products and products categories
		NPS?	Some products and product categories
			None or no information
		Disclosure	
4	6	How/where does the company publish its NP	In peer-reviewed journal
		system to allow consumers and other stakeholders	In full by the company itself
		to assess and understand it?	Limited information or on request only
			Not published

C1 Prod	uct pricin	g	
No. II	No. GI	Nutrition	
		Commitments	
<b>1</b> ♡	<b>1</b> ♡	Does the company make a commitment to address the affordability of its healthy products?	Clear commitment made for whole business, with particular reference to low-income populations
			Clear commitment made for whole business without particular reference to low-income populations
			Broad commitment with particular reference to low income populations
			No commitments/no information
		Performance	
<b>2</b> ♡	<b>5</b> ♡	Can the company demonstrate that it has done analysis on appropriate pricing of healthy products for low-income populations? (Tick all that apply)	Yes
			No or no information
<b>3</b> ♡	<b>7</b> ♡	Can the company provide examples that it has offered discounts, price promotions or coupons on healthy products at the same or greater rate as for less healthy products? (Tick all that apply)	Many examples
			Few examples
			None
		Disclosure	
4	8	Does the company publish: (Tick all that apply)	Commitment and/or policy
			Commentary on availability of affordable options for low- income populations
No. II	No. GI	Undernutrition	
		Commitments	
5	9	The company has a commitment and/or policy with	Yes
		respect to improving the affordability of its fortified	No
		products for the undernourished:	
6	11	Performance  Can the company provide evidence or examples of	Many examples (6 or more)
6	11	Can the company provide evidence or examples of improving affordability by reducing product sizes	Many examples (6 or more)
		fortified products to make them more affordable (absolutely or relatively to less healthy alternatives)	Few examples (3-5)
		or reduced/set pricing of fortified products specifically to enable low-income populations to better afford them?	No or no information
7	12	Can the company provide evidence of funding programs to improve the affordability of products	Partnerships with expert agencies or organisations
		specifically formulated or appropriate for specific undernourished groups either through:	By setting up its own programs
			No or no information
		Disclosure	
8	13	Does the company publish: (Tick all that apply)	Commitment/policy to make fortified products affordability for the undernourished
			Examples of improving the affordability of fortified products

9	14	Does the company publish: (Tick all that apply)	Commentary on programs supported in this area
			No or no information
C2 Dro	duct distri	hution	
No. II	No. GI	Nutrition	
NO. 11	No. GI	Commitments	
<b>1</b> ♡	<b>1</b> ♡	Does the company make a clear and specific commitment to address the accessibility of healthy products?	Clear commitment made for whole business, with particular reference to low-income populations
		products.	Clear commitment made for whole business without particular reference to low-income populations
			Broad commitment with particular reference to low-income populations
			No commitments/no information
		Performance	
<b>2</b> ♡	<b>⇔</b>	Can the company provide examples of improving the accessibility of more healthy option in India? (Tick all that apply)	Arrangements/incentives with retailers for prominent shelf positions for its +healthy products on a regular basis (not a one-off)
			Arrangements/incentives with distributors re. how healthy products are distributed
			Data to demonstrate that rural retailers are provided with healthy options as standard
			Data to demonstrate that retailers in poor urban areas are provided with healthy options as standard
			Other examples
			No evidence
		Disclosure	
3	7	Does the company publish: (Tick all that apply)	Commitment / policy
			Commentary on initiatives relating to improving the availability of affordable options for low-income populations Nothing
No. II	No. GI	Undernutrition	
		Commitments	
4	8	The company has a commitment/policy with respect to improving the distribution of its products specifically formulated or appropriate for specific undernourished groups (e.g. women of	Yes
		childbearing age, children between 2 and 5, children under 2 etc.):	
_		Performance	
5	10	How many examples can the company provide of	More than 5 separate examples
		improving the accessibility of one or more of its own products (healthy options) to populations with	2-4 separate examples
		om produces (recallity options) to populations with	1 example

		an income of less than US\$2 per day (or a similar measure of income)?	No evidence
6	12	Can the company can provide evidence of funding programs (non-commercial) to improve the accessibility of products specifically formulated or	Providing products to be distributed to undernourished populations
		appropriate for specific undernourished groups? (Tick all that apply)	Providing products to school feeding programs
			Using distribution systems to deliver micronutrient powders, supplements, etc.
			Otherwise supporting programs designed to address undernutrition to reach target populations with appropriate products
			No or no information
		Disclosure	
7	14	Does the company publish: (Tick all that apply)	Commitment/policy to make fortified products accessibility for the undernourished
			Examples on commercial initiatives relating to improving the availability of affordable options for the undernourished
8	15	Does the company publish: (Tick all that apply)	Commentary on (non-commercial) programs supported in this area
			No or no information

# Section 3 - Influencing consumer choice and behaviour

Categor	<b>v D</b> Resr	consible marketing policies, compliance and spending	
		icy: all consumers	
No. II	No. GI	Nutrition	
		Commitments	
1	1	The company has a responsible marketing policy that applies to all consumers that applies explicitly	TV & radio
		to the following media: (Tick all that apply)	Own websites
			Third party websites
			DVDs/CDs/GAMES
			Social media (FB or Twitter feeds of the company or brands)
			All print media (newspapers, magazines, books, and printed advertising in public places)
			Cinema
			Outdoor marketing
			In store marketing/point of sales marketing
			Sponsorship
2	2	The company's policy includes the following commitments related to the representation of products: (Tick all that apply). (See definitions Appendix III)	Commits that copy, sound and visual presentations in marketing communications for food and beverage products should accurately represent the material characteristics of the product featured, such as taste, size, content nutrition or health benefits, and should not mislead consumers concerning any of those characteristics. (Article 5 of ICC)
			All nutritional and health-benefit information and claims for food and beverage products should have a sound scientific basis. And where claims or terminology used in marketing communications might reasonably be interpreted by a consumer as health or nutrition claims, they should be supportable with appropriate scientific evidence. (Article 3 of ICC)
			Commits to presenting products in the appropriate portion size and context (and not condone or encourage excess consumption) (Article 1 of ICC)
			Commits not to represent food products not intended to be substitutes for meals as such. (Article 5 of ICC)
			Commits not to undermine the concept of healthy balanced diets, or the importance of a healthy active lifestyle. (Article 17 of ICC)
			Commits not to use any models with a BMI of under 18.5 (Industry best practice)

			Commits not to use consumer taste or preference tests in a way that might imply statistical validity if there is none.  Testimonials are based on well-accepted and recognized opinion from experts. (Article 6 of ICC)  Commits to presenting products in the context of a balanced
			diet (industry best practice)
			All of the above
		Disclosure	
3	3	Does the company publish its policy (or pledge to support the ICC Code), which is publicly available?	Yes, in full  Yes, in summary, not including details of scope of
			application No
D2 - Auc	diting and	compliance with policy: all consumers	
No. II	No. GI	Nutrition	
		Performance	
1	1	Does the company audit its compliance with its	Yes
		policy in India?	No/no information
2	2	How is compliance assessed?	The company appoints an independent external auditor to assess compliance with its policy or takes part in an auditing process of an external body it is a member of undertaken by independent company  By an industry association  The company conducts its own audits
			No audit/no information
		Disclosure	
3	3	Does the company disclose information about its	Yes
		audit?	No
D4 - Mai	rketing po	olicy: Children <sup>5</sup>	
No. II	No. GI	Nutrition	
		Commitments	
1	NEW	The company has a policy on marketing to children or supports the (India) International Food and Beverage:	Yes Under development No or no information
<b>2</b> ♡	<b>1</b> ♡	Does the company have a responsible marketing policy for children that applies explicitly to the following media: (Tick all that apply)	TV & radio Own websites
, i		TOHOWING THECHA. (TICK All that apply)	
		Tollowing media. (Tick all triat apply)	Third party websites
·		Tollowing media. (Tick all triat apply)	

 $<sup>^{5}</sup>$  For this criterion the healthy multiplier is only applied if the company uses an NPS to determine which products can be marketed to children.

All print media (newspapers, magazines, books, and printed advertising in public places) Outdoor marketing In store marketing/point of sales marketing Sponsorship Sponsorship Outdoor marketing In store marketing/point of sales marketing Sponsorship Does the company commit to representing foods fairly? (Tick all that apply)  Does the company commit to use celebrities responsibly or not at all? (Tick all that apply)  Does the company commit to use celebrities responsibly or not at all? (Tick all that apply)  With respect to fantasy and animated characters: (Tick all that apply)  With respect to fantasy and animated characters: (Tick all that apply)  With respect to fantasy and animated characters: (Tick all that apply)  With respect to fantasy and animated characters: (Tick all that apply)  With respect to fantasy and animated characters: (Tick all that apply)  Does the company and animated characters: (Tick all that apply)  Does the company commit to use promotional tops, games, vouchers and competitions responsibly by using them only in relation to healthy foods?  Does the company commit to use promotional tops, games, vouchers and competitions responsibly by using them only in relation to healthy foods?  Does the company commit to use promotional tops, games, vouchers and competitions responsibly by using them only in relation to healthy foods?  Does the company commit to use promotional tops, games, vouchers and competitions responsibly by using them only in relation to healthy foods?  What kind of products does the company advertise to children aged 2-6 does the company use to restrict its TV advertising?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?				
Sponsorship   In store marketing/point of sales marketing				All print media (newspapers, magazines, books, and printed
Sponsorship  Does the company commit to representing foods fairly? (Tick all that apply)  Does the company commit to use celebrities responsibly or not at all? (Tick all that apply)  Commits not to sponsor materials, people or activities popular with children (other than sports activities) except in conjunction with healthy product. Pledges not to use celebrities and other people with strong appeal to children in marketing of products other than those that meet the company's healthy standard. Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product. Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product. Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product. Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product. Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product. Pledges that the storing appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging.  Does the company commit to use promotional toys, which is a str				
Solution   Does the company commit to representing foods   Fairly? (Tick all that apply)   Solution   The nutritional content of products and the benefits of consumption are fairly and accurately represented   Commits not to sponsor materials, people or activities   Propular with children (other than sports activities) except in conjunction with healthy product   Predges not to use celebrities and other people with strong appeal to children in marketing of products other than those that meet the company's healthy standard   Predges not to use the product with a product soften than those that meet the company's healthy standard   Predges not to use the fundamental or products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an excep				In store marketing/point of sales marketing
Second Products and the benefits of consumption are fairly and accurately represented   The nutritional content of products and the benefits of consumption are fairly and accurately represented				Sponsorship
The nutritional content of products and the benefits of consumption are fairly and accurately represented consumption are fairly and accurately represented committed in the consumption are fairly and accurately represented committed in the product responsibly or not at all? (Tick all that apply)  **Production**  **Production**  **Production**  **Production**  **Production**  **Production**  **Production**  **Production**  **Production**  **Prediction**  **Pr		<b>4</b> ♡		· · ·
Conjunction with healthy product   Pledges not to use celebrities and other people with strong appeal to children in marketing of products other than those that meet the company's healthy standard	ľ			·
appeal to children in marketing of products other than those that meet the company's healthy standard Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product    Pledges that celebrities or others, if used, will not imply they have achieved their enhanced performance or status through use of the product Pledges not to use third-party fantasy and animation characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, IN ALL FORMS OF MARKETING Pledges not to use third-party fantasy and animated characters with a strong appeal to children in marketing of products other than those that the the company's healthy standard, with an exception for point of sale and packaging Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products only and products only and products only ALL FORMS OF MARKETING Pledges not to use third-party fantasy and animated		<b>⇔</b>		popular with children (other than sports activities) except in
Section   Sec				appeal to children in marketing of products other than those
products other than those that meet the company's healthy standard, In ALL FORMS OF MARKETING  Pledges not to use third-party fantasy and animation characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, In ALL FORMS OF MARKETING  Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, In ALL FORMS OF MARKETING  Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, In ALL FORMS OF MARKETING  Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, In ALL FORMS OF MARKETING  Pledges not to use wife and packaging  Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, In ALL FORMS OF MARKETING  Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, In ALL FORMS OF MARKETING  Pledges not to use wife and packaging  Promotional games, toys, vouchers, competitions etc. are used only in relation to healthy foods  No commitment  25%  26%  26%  26%  26%  26%  26%  26%				have achieved their enhanced performance or status
characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, IN ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging Promotional games, toys, vouchers, competitions etc. are used only in relation to healthy foods  Promotional games, toys, vouchers, competitions etc. are used only in relation to healthy foods  No commitment  7		<b>7</b> ♡		characters with a strong appeal to children in marketing of products other than those that meet the company's healthy
with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, IN ALL FORMS OF MARKETING Pledges not to use own fantasy and animated characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging  Boes the company commit to use promotional toys, games, vouchers and competitions responsibly by using them only in relation to healthy foods?  Advertising to children aged 2-6  What percentage audience threshold for children aged 2-6 does the company use to restrict its TV advertising?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?				characters with a strong appeal to children in marketing of products other than those that meet the company's healthy
with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging  8				with a strong appeal to children in marketing of products other than those that meet the company's healthy standard,
games, vouchers and competitions responsibly by using them only in relation to healthy foods?  8 Advertising to children aged 2-6  7.1 9.1 What percentage audience threshold for children aged 2-6 does the company use to restrict its TV advertising?  What percentage audience threshold for children aged 2-6 does the company use to restrict its TV advertising?  26-35% > 36% > 50%				with a strong appeal to children in marketing of products other than those that meet the company's healthy standard,
7.1 9.1 What percentage audience threshold for children aged 2-6 does the company use to restrict its TV advertising?  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  No commitment	<b>6</b> ♡	8	games, vouchers and competitions responsibly by	
7.1			using them only in relation to healthy foods?	No commitment
aged 2-6 does the company use to restrict its TV advertising?  26-35%  >36%  >50%  No audience threshold  7.2  9.2  What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  Healthy products  Healthy products	7	9	Advertising to children aged 2-6	
advertising?  26-35%  >36%  >50%  No audience threshold  7.2 9.2 What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  Healthy products  Healthy products		9.1	-	<25%
>36% >50% No audience threshold  7.2	0		_ · ·	26-35%
7.2 9.2 What kind of products does the company advertise to children aged 2-6?  No audience threshold  No products  Healthy products only  All products				>36%
7.2 9.2 What kind of products does the company advertise to children aged 2-6?  What kind of products does the company advertise to children aged 2-6?  Healthy products only  All products				>50%
to children aged 2-6?  Healthy products only  All products				No audience threshold
All products		9.2		
·		<u> </u>	to children aged 2-6?	
	8	10	Advertising to children aged 7-12	All products
			-	

8.1	10.1	What percentage audience threshold for children	<25%
8	$\Diamond$	aged 7-12 does the company use to restrict its TV	26 - 35%
		advertising?	>36%
			>50%
			No audience threshold
8.2	10.2	What kind of products does the company advertise	No products
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	10.2	for children aged 7-12?	Healthy products only
·			All products
9	15	To what extent does the company commit to a	No marketing or advertising IN PRIMARY schools
$\Diamond$	<b>15</b> ♡	responsible marketing approach near and in	The marketing of davertioning in that which believes
		PRIMARY schools (schools for children up to age	Only marketing/advertising 'healthy' products in PRIMARY
		11)? (Tick all that apply)	schools in agreement with schools/parents
			Commitment extends to places NEAR PRIMARY schools
			Commitment applies explicitly to new media
			marketing/advertising techniques
			Commitment includes only offering 'educational materials' when in agreement with schools/parents
			The company does not commit to this or no information
10 ♡	<b>16</b> ♡	To what extent does the company commit to a responsible marketing approach near and in	No marketing or advertising in SECONDARY schools
		SECONDARY schools (schools for children between	Only marketing/advertising 'healthy' products in
		the ages of 12 and 18)? (Tick all that apply)	SECONDARY schools in agreement with schools/parents
			Commitment extends to places NEAR SECONDARY schools
			Commitment applies explicitly to new media
			marketing/advertising techniques
			Commitment includes only offering 'educational materials'
			when in agreement with schools/parents
			The company does not commit to this or no information
		Disclosure	
11	18	Does the company publish its policy in full or it	Yes, policy or Pledge that is published in full
		follows an industry Pledge or Initiative that is	Yes, policy or Pledge published in summary only
		publicly available?	No
		compliance with policy: Children	
No. II	No. GI	Nutrition	
		Performance	
1	1	Does the company audit its compliance with its	Yes
		policy on marketing to children?	No or no information
2	2	Is the audit conducted by:	The company appoints an independent auditor
			Compliance is assessed by an industry association or pledge organization
			The company conducts an internal audit
			No audit/no information
3	3	How often is the audit undertaken?	Annually
			Less frequently than annually
			No information
		Marie I. P. Lind Dr.	The company audits compliance across all media
4	4	Which media are covered by the audit:	THE COMPANY AUGIS COMPINANCE ACTOSS AN INEGRA

			The company audits compliance across 2 or 3 forms of media
			The company audits compliance across 1 form of media/scope is unclear but there is clear evidence of auditing
			No audit
5	5	What is the company's individual compliance level for TV and internet marketing?	
5.1	5.1	Individual compliance level for TV:	Over 90%
			Less than 90% or no reporting
5.2	5.2	Individual compliance level for internet based media:	Over 90%
			Less than 90% or no reporting
6	6	Does the company have a clear commitment to corrective action?	Clear commitment to corrective action, if needed
			No commitment to corrective action
		Disclosure	
7	7	What level of detail does the company publish about its compliance levels?	The company publishes its individual compliance level for both TV and internet-based media based on an audit of multiple markets
			The company publishes its individual global compliance level for only one medium based on an audit of multiple markets
			The company publishes the aggregate compliance level of an industry audit (based on an audit of multiple markets) but does not provide its individual compliance level
			No public disclosure on audit results/No evidence of audits being conducted

		porting healthy diets and active lifestyles	
		aff health & wellness	
No. II	No. GI	Nutrition	
		Commitments	
1	1	Does the company make a commitment to support	Yes
		staff health and wellness through a program focused on nutrition, diet and activity?	No or no information
2	2	Does the company set a target for Indian employee	More than 70% of staff to participate in one year
		participation in its health and wellness programs?	Between 30 - 69% to participate in one year
			Broad objectives
			No targets
		Performance	
3	5	Which of the following elements are included in the company's program at headquarters offices?	
		A. Healthy Diet: (Tick all that apply)	Seminars on nutrition, diets etc.
			Online materials and support for staff on nutrition and diet
			Healthy options/diet plans in cafes, restaurants on work sites
			Dietary information on menus
			Subsidized fruit/healthy snacks
			No subsidies on chocolates, high sugar/fat/salt products
			Cooking master classes focused on healthy options
			Links to local fresh food markets or similar
			Personalized nutrition
			No program
		B. Healthy Body: (Tick all that apply)	Gyms on work sites
			Personalized exercise plans
			Subsidies for gym memberships off site
			Lunchtime/worktime walking or exercise clubs
			On-site sports teams
			Active participation in sports challenges
			Encouragement to use stairs not lifts etc.
			Encouragement/facilities to walk/bike to work
			Online resources re. healthy living/exercise
			No program
		C. Healthy behavior: (Tick all that apply)	Senior staff model good behavior, publicize their efforts
			Health focused welcome pack for new starters
			Healthy living/nutrition campaigns regularly throughout work sites
			Awards for staff making good progress
			Other: counselling sessions, work life balance sessions etc.
			No program
4	9	Can the company demonstrate the health improvements delivered by the nutrition, diet and	Both quantitative and qualitative results
		activity elements of its health and wellness program in India?	Only qualitative results
			No or no information
			No or no information
		Disclosure	
5	10,11	Does the company publish: (Tick all that apply)	Commitment
	12,13		Targets
			Quantitative outcomes
			Qualitative outcomes
			•

E2 Supp	orting br	eastfeeding mothers at work	
No. II	No. GI	Nutrition	
		Commitments	
1	1	Does the company commit to providing breastfeeding mothers with appropriate working conditions and facilities at work?	Yes, set out in a policy Make a commitment, but no formal policy No or no information
2	2	Does the company's maternity policy allow women to take paid maternity leave?	6 months or more Between 3 and 6 months No or no information
		Performance	
3	3	Does the company provide facilities that support breastfeeding mothers? (Tick all that apply)	Provide safe private rooms to express milk  Provide fridges to store expressed breastmilk
			Allow breaks or give flexible working hours
		Disclosure	
4	4	Does the company publish: (Tick all that apply)	Policy/commitment on supporting breastfeeding mothers
			A commentary about how it supports breastfeeding mothers within the workplace
			No or no information
E3 Supr	orting co	nsumer-oriented healthy eating and active lifest	yle programs
No. II	No. GI	Nutrition	
		Commitments	
1	1	Does the company commit to sponsor/fund:	
1.1	1.1	Nutrition education /healthy diet oriented programs (this can include water/sanitation programs linked	Yes
		to nutrition)	No
1.2	1.2	Active lifestyle programs (sports, physical activity):	Yes
			No
2	2	What types of programs does the company commit to supporting?	
2.1	2.1	For healthy eating/nutrition education programs for its consumers and/or local communities:	Commits to exclusively supporting programs developed and implemented by independent groups with relevant expertise
			Commits to supporting programs developed and implemented by independent groups in addition to its own programs
			No commitment or only to offer own programs
2.2	2.2	For active lifestyle programs for its consumers and/or local communities?	Commits to EXCLUSIVELY supporting programs developed and implemented by independent groups with relevant expertise
			Commits to supporting programs developed and implemented by independent groups IN ADDITION TO ITS OWN PROGRAMS
			No commitment or only to offer own programs
		Performance	
	5		Yes by an independent evaluator

		Are the programs' health impacts independently	Yes by the company itself
		evaluated?	No or no information
		Disclosure	
4	6	The company publishes: (Tick all that apply)	Commitments
			A description of the nutrition education/healthy eating programs, making clear the company's role
			A description of the physical activity programs, making clear the company's role
			No or no information
No. II	No. GI	Undernutrition	
		Commitments	
5	9	Does the company commit to funding/supporting	Benefits of consuming fortified foods
		other organization's programs (such as GAIN or another example of an Indian organisation) that educate undernourished consumers about: (Tick all that apply - max 10 points)	Benefits of maternal micronutrient supplementation
			Benefits of exclusive breastfeeding
			Benefits of safe, timely and adequate complementary feeding for infants and young children
			Benefits of dietary supplementation for infants and young children
			Benefits of infant/child micronutrient supplementation
			Benefits of a diverse diet
			Benefits of access to drinking water and sanitation
		Performance	
Not scored	13	Are all or some of the company's programs designed and implemented by an independent third	Yes, in all cases
		party in such a way as the company does not direct	In some cases
		the structure of the program? (For information only, i.e. not scored)	No or no information
		Disclosure	
6	15,16	The company publishes its: (Tick all that apply)	Commitments re. types of programmes to be funded commercially
			The impact evaluations carried out for the programs it supports

Catego	Category F Product labelling and use of health and nutrition claims			
F1 Prod	luct label	ling		
No. II	No. GI	Nutrition		
		Commitments		
1	1	Does the company commit to disclose nutritional	Back-of-pack and front-of-pack	
		information on its products:	Back-of-pack OR front-of-pack only	
			No or no information	
		Commitments for Back of pack labelling		
2	3	Does the company commit to provide Back-of-Pack	Saturated fat separate to total fat	
		nutrition information on the following nutrients not	Transfat	
		covered by Indian regulation? (Tick all that apply)	Dietary fiber	
			Sodium (salt)	
3	4	Does the company state for products packaged as	Yes for both single portion and multiple portion	
		a single portion or with multiple portions or		
		servings, a commitment to providing nutritional	Yes for either single or multiple portion	
		information on a per serving or per portion basis,	res for either single of multiple portion	
		as quantified on the label, or on a per 100g or per		
		100ml basis, and stating the number of portions or	No or no information	
		servings contained in the package. (Codex CAC/GL 2-1985)?		
		Commitments for Front of pack labelling		
4	5	Does the company also commit to providing	Numeric information only, but showing % of recommended	
-		information on the front of pack?	daily intake (or similar measure)	
			Numeric information on levels of key nutrients, but not	
			showing % recommended daily intake (or similar measure)	
			No FOP labelling used	
_		Disclosure		
5	8	Does the company publish a detailed	List of nutrients included on labels set out in policy	
		policy/commitments on nutrition labeling? (Tick all that apply)	Commitment to labeling by per serving or per portion size	
		that apply)	etc.	
			Commitment to BOP labeling	
			ğ	
			Commitment to FOP labelling	
			None or no information	
			No or no information	
6	10	For what percentage of products does the company provide nutrition information online?	For 90% or more of products	
U	10		1 of 30% of filore of products	
		provide riddiction information orinine.	For between 50 - 90% of products	
			For between 10 - 49% of products	
			No nutrition information published or for less than 10% of	
			products	
		itrition claims		
No. II	No. GI			
		Commitments		
1	1	Does the company state that it will place a nutrition	Yes	
		claim on a product only when that claim complies	No or no information	
		with Codex guidance?		

2	2	Does the company state that it will only place a health claim on a product if that claim complies with Codex?	Yes  No or no information
		Performance	
<b>3</b> ♡	<b>3</b> ♡	Does the company track the number of products that meet its healthy standard that carry health	Yes
		claims and nutrition claims in India?	No or no information
		Disclosure	
4	4	Does the company disclose publicly its	Yes
		commitment/policy about using health and nutrition claims on products in India?	No or no information

GI LUDI	Jynn <u>y am</u>	d influencing governments and policymakers	
No. II	No.	Nutrition	
	GI		
Commit	ments		
1	1	Does the company commit to engage with political parties, policymakers and policymaking bodies when requested in support of preventing and addressing obesity, diet-related chronic diseases and undernutrition?	Commitment clearly extends to lobbying conducted by third parties paid by the company Commitment only appears to cover lobbying done by company directly No or no information
Disclosu	ıre		
2	3	Does the company publish: (Tick all that apply)	Its membership of industry associations, lobbyists (individuals or groups), think tanks, interest groups or othe organizations that lobby on its behalf
			Its financial support for these organisations
			Any potential governance conflicts of interest (or state that none exist)
			Board seats at industry associations and on advisory bodies related to nutrition issues
3	4.2	Does the company disclose its public policy position on: (Tick all that apply)	Health and nutrition claims/ regulatory development
			Front of pack labelling
			Fiscal instruments related to nutrition
			Marketing to children
G2 Stak	eholder	engagement engagement	
No. II	No. GI	Nutrition	
		Commitments	
1	1	Does the company follow a policy/standard to engage with nutrition stakeholders in India?	Yes
			No or no information
		Performance	
2	2	How well structured and organised is stakeholder engagement in India?	Comprehensive, well-structured and focused on business strategy and performance
			Limited; typically one-way communication rather than engagement to inform strategy and performance
			No information
3	3	Can the company provide evidence of engagement with stakeholders?	Extensive engagement with international and local stakeholders
			Some engagement

		Disclosure	
4	4	Does the company explain how input from stakeholders has been used to inform the company's strategy or practices in India?	Specific examples of how input has been used to adapt policies/programs, i.e. to change business practices
			Broad statement about the benefits of stakeholder dialog but no specific examples of how input has been used to inform the company's strategy or practices in India No
	No.	Undernutrition	
		Performance	
5	5	Can companies provide evidence on one-to-one discussions with key organizations working on undernutrition to solicit input on its commercial strategy/policy/approach to undernutrition?	More than 3 organizations
			1-2 organizations
			No such discussions
		Disclosure	
6	6	Does the company provide a narrative about its stakeholder engagement activities: related to undernutrition?	Yes
			No

# Appendix I Organisations consulted

Organization	F&B companies
Action Contre la Faim	Amul
AIIMS	Britannia
AT Kearny	Cargill
Bill and Melinda Gates India	Coca-Cola
CHETNA (Centre for Health Education and Nutrition Awareness)	Ferrero
Children's Investment Fund India	Kellog
FRAC/FLAIR	Milma
Food Fortification Initiative	Mondelez
GAIN	Mother Dairy
George Institute	Nestllé
IFPRI	Parle
Ministry of WCD	PepsiCo
Project Hope	Unilever
Save the Children	CII (industry association)
	FICCI (Chamber of Commerce)

# Appendix II ATNI Expert Group

The mandate of the ATNI Expert Group is to provide input into the development of the Access to Nutrition Index methodology. This group consists of members with expertise in various aspects of nutrition (including both undernutrition, and obesity and diet-related chronic diseases).

The members of the Expert Group serve in their personal capacities and in an advisory role. As such, the scope and content of ATNI do not necessarily reflect their views or the views of their institutions. Members are listed below.

# Shiriki Kumanyika

Chair ATNI Expert Group; Professor of Epidemiology, Department of Biostatistics and Epidemiology, Perelman School of Medicine, University of Pennsylvania

# Lindsay H. Allen

Director, USDA ARS Western Human Nutrition Research Center; Research Professor, Department of Nutrition, UC Davis

## **Terry T-K Huang**

Professor, School of Public Health, City University of New York

#### **CS Pandav**

Professor and Head, Centre for Community Medicine, All India Institute of Medical Sciences

## Mike Rayner

Director, British Heart Foundation Health Promotion Research Group, University of Oxford

## **Linda Meyers**

Senior Science Advisor for the American Society for Nutrition (ASN)

## **Boyd Swinburn**

Professor of Population Nutrition and Global Health at the University of Auckland and Alfred Deakin Professor and Director of the World Health Organisation (WHO) Collaborating Centre for Obesity Prevention at Deakin University in Melbourne

#### **Kapil Yadav**

Assistant Professor, Centre for Community Medicine, All India Institute of Medical Sciences

# Appendix III General Definitions

Commercial activities	Related to core business, funded through annual commercial budgets, as distinct from philanthropic activities funded from post-tax profits.
Commitments	Company's commitment(s) to take action on any topic. A commitment is what the company pledges to do. This is different to an objective/goal or target which are both more specific than a commitment.
Food and beverage manufacturers	Companies that produce packaged/processed foods and beverages. In ATNI, this excludes those companies that simply process milk, meat, fish, oil etc. before selling it, and those that make alcoholic beverages.
Health claim	Any statement made by a company about a relationship between food and health related to its products, in the context of formal regulated health claims placed on products.
Healthy multiplier	A healthy multiplier is applied to any scores for questions that ask about commitments or performance relating to 'healthy' products. The multiplier is derived from the company's score on B2 (but is not the actual score).
Healthy products	Those products of high nutritional quality as assessed by a robust nutrient profiling system.
ICC (framework for responsible food and beverage marketing communication)	International Chamber of Commerce framework for responsible food and beverage marketing communication.
Negative food components	Salt, added sugars, transfats, saturated fats.
Nutrient profiling systems	A system that classifies food and beverages according to their nutritional composition.
Nutrition (or nutrient content) claim	Any claim made by a company about its product which states, suggests or implies that a food has particular beneficial nutritional properties due to the energy (calorific value) provides, provides at a reduced or increased rate or does not provide, and/or the nutrients or other substances it contains or contains in reduced or increased proportions or does not contain.
Performance	What a company's does/delivers on a particular topic.
Philanthropic/non-commercial	Not related to core business – funded out of post-tax profits or other non-commercial budgets or revenue streams.
Policy	A written formalized document, usually signed off by the Board.
Positive food components	Fruits, vegetables, fibers, wholegrains.
Disclosure	Information a company publishes.
SKUs	Stock Keeping Unit
Undernourished	People that eat less than the minimum amount of the foods, especially micronutrients, essential for sound health and growth.



## **Access to Nutrition Foundation**

Nieuwekade 9 3511 RV Utrecht The Netherlands +31 (0)30 230 56 48 info@accesstonutrition.org www.accesstonutrition.org