

US INDEX 2018

CORPORATE PROFILE METHODOLOGY

FINAL



ACCESS TO
NUTRITION
INDEX™

US INDEX 2018
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Introduction

This document sets out the Corporate Profile methodology for the first US Spotlight Index. This Index was developed and will be published by the Access to Nutrition Foundation (ATNF), a not-for-profit organization based in The Netherlands. By providing major US 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 US Spotlight Index is modeled on the Global Access to Nutrition Index, which was initially developed over a three-year period from 2010 to 2012 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. ATNF is fully independent and is currently funded by Bill & Melinda Gates Foundation, the Dutch Ministry of Foreign Affairs (DGIS) and the Robert Wood Johnson Foundation. ATNF is also pleased to have the support of over 50 of major institutional investors with more than US\$4 trillion under management. The first Global Index was published in 2013, the second in January 2016 and the third Index is planned to be published in March 2018. It will rank 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 first India Spotlight Index was published in December 2016. Further India Spotlight Indexes will be published every two years.

Also in 2016, ATNF, started exploring the possibility of publishing the first US Access to Nutrition Spotlight Index. Early in 2017, ATNF consulted extensively with various US stakeholders on how to adapt the Global Index methodology to the US context. Various companies, civil-society organisations, academia and policymakers were involved through round-tables, meetings and one-to-one consultations (see the full list in Annex I). In addition, ATNF convened a US Expert Group to provide advice on all aspects of the methodology (see Appendix II for the list of members of the US Expert Group).

The first US Spotlight Index will assess the 10 largest food and beverage manufacturers based on US revenues in FY2016 (using Euromonitor data): ConAgra Brands Inc, Dr Pepper Snapple Group, General Mills Inc, Kellogg Co, Kraft Heinz Co, Mars Inc, Nestlé SA, PepsiCo Inc, The Coca-Cola Co and Unilever.

Corporate Profile Methodology structure

As in the Global Index Corporate Profile methodology, the basic structure of the US Index Corporate Profile methodology has not been modified. The Corporate Profile 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 behaviour.
- **Categories:** Seven broad categories (A-G) relevant to companies' nutrition-related practices.
- **Criteria:** More detailed criteria within each of the Categories.
- **Indicators:** Performance indicators within each Criterion on which companies are scored. There are three types of indicator: those related to companies' commitments, performance and disclosure.

The Indicators assess companies' practices related to promoting good nutrition for all consumers, to help prevent and tackle obesity and diet-related chronic diseases.

Differences compared to the Global 2018 Corporate Profile Index

The Corporate Profile methodology has been adapted to US laws, regulations, standards and guidance. Only commitments and performance data relating to the US are assessed.

Key differences compared to the Global Index Corporate Profile Index are:

Unlike the Global Index, the US Index Corporate Profile does not include the section on addressing undernutrition in the developing world (which carries 25% of the overall of the overall Global Index score). Instead, indicators assessing companies' activities related to food insecurity in the US are integrated in the general sections.

Rather than assessing what companies do in respect of 'low-income populations' as in the Global Index, in the US 'priority populations' are defined and referred to.

Access to Nutrition Indexes do not assess compliance with the law. Thus, given the strong regulation of nutrition labelling and use of claims in the US, Category F which assesses these topics focuses on whether companies commit to front-of-pack labelling in US. F2 has been removed. Because the Category only contains some indicators the weight in the overall score has been reduced to 5% (as compared to 15% in the Global Index). The remaining 10% has been divided over Category B, C, D and E.

In addition, several US-specific nutrition topics have been incorporated in the Corporate Profile methodology. These include:

- What companies do to address food insecurity among priority populations in the US
- Whether companies follow US dietary guidelines in setting formulating or reformulating their products and whether they commit to addressing the 'copy-cat' issue.
- Whether companies commit to donating healthy foods to public health and nutrition programs.
- Responsible marketing policies and performance with reference to priority groups and that go beyond the CFBAI pledge.
- Companies' expenditure on marketing healthy products.
- How the public health and nutrition programs the company supports are designed and evaluated.

Table 1 US Index Corporate Profile Methodology Overview

Category (weight in total score)	Description	Criteria
Section 1: Nutrition governance and management		
A (12.5%)	Corporate strategy, management and governance	A1 Corporate nutrition strategy
		A2 Nutrition governance and management systems
		A3 Quality of reporting
Section 2: Formulating and delivering appropriate, affordable, accessible products		
B (27.5%)	Formulating appropriate products	B1 Product formulation
		B2 Nutrient profiling system
C (22.5%)	Delivering affordable, accessible products	C1 Product pricing
		C2 Product distribution*
Section 3: Influencing consumer choice and behavior		
D (22.5%)	Responsible marketing policies, compliance and spending	D1 Responsible marketing policy: all consumers
		D2 Auditing and compliance with policy: all consumers
		D3 Marketing expenditure: all consumers
		D4 Responsible marketing policy: children
		D5 Auditing and compliance with policy: children
		D6 Marketing expenditure: children
E (5%)	Supporting healthy diets and active lifestyles	E1 Supporting staff health & wellness
		E2 Supporting breastfeeding mothers in the workplace
		E3 Supporting consumer-oriented healthy eating and active lifestyle programs
F (5%)	Product labeling and use of health and nutrition claims	F1 Product labeling
G (5%)	Influencing governments and policymakers, and stakeholder engagement	G1 Lobbying and influencing governments and policymakers
		G2 Stakeholder engagement

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 and strategic focus on health and nutrition in the US market in general and whether it makes a specific reference to priority populations who lack access to a wide variety of healthy foods in the US. The Category furthermore assess whether its approach is embedded within its governance and management systems, as 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 of the Corporate Profile methodology.

Category B Formulating appropriate products

Companies in the US 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. 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 27.5% of the weight of the overall score Corporate Profile methodology..

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 affordable and accessible to US consumers through their approaches to pricing and distribution. It consists of two Criteria:

- C1** Product pricing
- C2** Product distribution

This Category carries 22.5% of the weight of the overall score Corporate Profile methodology..

Category D Responsible marketing policies, compliance and spending

This Category captures the extent to which companies support US consumers, including priority consumer groups and children, 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 expenditure

CHILDREN

- D3** Responsible marketing policy
- D4** Auditing and compliance with policy
- D6** Marketing expenditure

This Category carries 22.5% of the weight of the overall score Corporate Profile methodology..

Category E Supporting healthy diets and active lifestyles

Companies can support healthy diets and active lifestyles for their own staff in the US 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 in the US a healthy start to life. Companies can also help consumers to adopt healthy diets and active lifestyles through supporting public health and nutrition programs in the US.

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 public health and nutrition programs

This Category carries 5% of the weight of the overall score Corporate Profile methodology.

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 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 diseases.

Given the strong regulation of nutrition labelling and use of claims in the US, this Category is limited to whether companies commit to front-of-pack labelling in US. This assessment has one Criteria:

- F1** Product labelling

This Category carries 5% of the weight of the overall score Corporate Profile methodology.

Category G Influencing governments and policymakers, and stakeholder engagement

Companies can have an impact on consumers' access to nutrition by influencing the US government and policymakers through lobbying activities, political contributions and positions on nutrition policies. In addition, constructive engagement by companies with a wide range of other stakeholders in the US (including 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 Corporate Profile methodology.

US Index Corporate Profile

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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 75% or more on B2).

Section 1 - Nutrition governance and management

Category A Corporate strategy, management and governance

A1 Corporate nutrition strategy		
US		
No.	Nutrition	
	Commitments	
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 in the US markets?	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	Has the company stated a commitment to deliver more, healthy foods, and made a specific reference to priority populations ¹ who lack access to a wide variety of healthy foods in the US?	Yes, but with no explicit reference to priority populations who lack access to a wide variety of healthy foods
		Yes, but with no explicit reference to priority populations
		Commitment under development
		No commitment or no such statement.
3	Company's role in nutrition	
3.1	Does the company recognise it has a role to play in tackling the US challenges of increasing levels of obesity and diet-related chronic diseases?	Yes
		No or no information
3.2	Does the company recognise the key public health priorities, as set out in authoritative documents such as the WHO Global Action Plan 2013 – 2020, the US Surgeon General's 2011 National Prevention Strategy or the Institute of Medicine's 2012 Report	No or no information

¹ Priority populations lack access to healthy food at affordable prices, encompassing rural and urban poor, including various ethnic minorities, and others, e.g. those with low mobility.

A1 Corporate nutrition strategy		
US		
No.	Nutrition	
	Accelerating Progress in Obesity Prevention?	
	Performance	
4	How comprehensive is the company's assessment of risks related to nutrition?	Numerous nutrition-related risks identified Limited No or no information
5	Does the company state that nutrition was a factor in the company's decisions about acquisitions, disposals and forming joint ventures or other partnerships in the last 3 years?	Company states that nutrition issues are factored into its acquisitions, disposals, JV or partnership decisions and provides specific examples Company states that nutrition issues are factored into its acquisitions, disposals, JV or partnership decisions but does not provide specific examples No evidence that nutrition issues are factored into a company's acquisitions, disposals, JV or partnership decisions
6 ♥	What percentage of the company's total US value of sales in FY2016 did healthy products account for?	
7	What % of US revenues are derived from selling products to schools under the Smart Snacks to Schools program (Not scored, for information only)	
	Disclosure	
8	Does the company disclose: (Tick all that apply)	A clear statement that its growth strategy is based on an increasing focus on health and nutrition (Indicator 1) Acquisitions, disposal, JV and partnerships commentary related to nutrition (Indicator 5) Quantitative information about % total sales accounted for in FY2016 by healthy products (Indicator 6)

A2 Nutrition governance and management systems		
US		
No.	Nutrition	
	Commitments	
1	Does the company have a Board- approved commercial 'nutrition strategy' or 'nutrition policy' for the US market?	Comprehensive Limited Under development None of these
2	Has the company set objectives relating to delivering its nutrition strategy or policy in the US?	A comprehensive set of objectives A limited set of objectives The company is in the process of developing objectives The company doesn't have objectives/no information
3	Does the company or its foundation fund non-commercial public health and nutrition programs?	Yes, based on a clear strategy or plan Yes on an ad-hoc basis No Information
	Performance	
4	Who has formal accountability for implementing the company's nutrition strategy and/or programs in the US?	CEO or an Executive that reports directly to the Board A committee that reports to the Board, e.g. Sustainability or Corporate Responsibility Committee

A2 Nutrition governance and management systems		
US		
		No information
5	Does the company seek specialist external experts' advice on preventing and addressing obesity and diet-related chronic disease?	<p>Formal panel of experts with a broad range of expertise (i.e. nutrition and health, responsible marketing, labelling, promoting active lifestyles, food insecurity etc.)</p> <p>Formal panel of experts with narrow range of expertise (e.g. medical or nutrition only; no marketing/sports and activity/nutrition education etc. specialists)</p> <p>Informal/ad-hoc input sought</p> <p>No external input sought/no information</p>
6	To whom does the company allocate the day-to-day responsibility for implementing its nutrition strategy/plan in the US? What is his/her function and level in the company?	<p>An Executive Manager (one level below the board)</p> <p>A Manager two or more levels below the board</p> <p>No responsibility or no Information</p>
7	Is the company's nutrition plan/strategy delivery subject to standard internal audit and annual management review?	<p>Yes, standard internal audit and annual management review</p> <p>Either standard internal audit or annual management review but not both</p> <p>To none of them or no information</p>
8	Does the company link the remuneration of the CEO and/or senior managers with performance on nutrition targets/objectives?	<p>CEO's compensation is specifically linked to performance on nutrition objectives in the US</p> <p>CEO's compensation is linked to performance on US CSR initiatives (nutrition clearly part of those initiatives)</p> <p>Only links senior managers' remuneration to performance on US nutrition objectives</p> <p>No link or no information</p>
	Disclosure	
9	Does the company disclose: (Tick all that apply)	<p>Its nutrition strategy/policy for, or which covers the US (Indicator 1)</p> <p>A comprehensive or limited set of objectives, related to R&D, NPD, reformulation, improving accessibility and affordability, labelling, use of claims etc. and/ or a limited set of objectives (Indicator 2)</p> <p>Accountability arrangements for delivering the company's nutrition strategy (Indicator 4)</p> <p>Names and affiliations of members of its advisory panel/names of advisors link to (Indicator 5)</p> <p>Managerial arrangements (Indicator 6)</p> <p>Compensation arrangements for CEO (Indicator 8)</p>

A3 Quality of reporting		
US		
No.	Nutrition	
	Performance	
1	Does the company publish formal, regular reports on its overall approach to tackling nutrition issues for the US market and how often?	Annually (i.e. the company has an annual reporting cycle)
		Less frequently than annually
		No reporting
2	Does the company's reporting on preventing and addressing obesity and diet-related chronic diseases in the US include: (Tick all that apply)	A clear sense of the company's nutrition strategy and how it relates to overall business strategy
		Clear reporting against all objectives and targets
		A clear outlook on future plans and targets
		Explanation of the challenges faced, not only success/positive stories
		None / not relevant
3	The company's reporting on fighting hunger in the US includes its non-commercial public health and nutrition programs:	Comprehensive
		Limited
		None
4	In what kind of publication and how does the company report on its nutrition activities?	Throughout the Annual Report and Accounts or equivalent, highlighting how nutrition issues are adding value to the business
		Within its Annual Report and Accounts or equivalent, e.g. in the sustainability or corporate responsibility section
		In a separate report (e.g. website) on its nutrition activities but does not mention nutrition issues its Annual Report and Accounts or equivalent.
		No reporting
5	Is the company's nutrition reporting subject to verification or external review?	The report that contains the nutrition commentary is independently verified
		Report not formally verified but includes commentary from independent external reviewer(s)
		No or limited external review

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

Category B Formulating appropriate products

B1 Product formulation ²		Product Category 1-5
US		
No	Nutrition	
	Commitment	
1	Has the company made any commitments to invest (or continue to invest) in R&D to improve the nutritional quality of its products for the US markets?	Yes No or no information
2	What percentage of US revenues did the company spend on R&D (e.g. average over last 3 years)? (For information only, i.e. not scored)	
3	Has the company set targets for the US markets with respect to the amount it intends to increase its R&D effort/spending in coming years on nutrition (or the number of new, healthy products it intends to introduce)?	Yes No or no information
4	Does the company state that its approach to reformulating its existing products is aligned to the US dietary guidelines?	US dietary guidelines No commitment to reformulating products or no information
5	Does the company commit to formulate all products that it sells under the Smart Snacks in School program in the same way for sales outside schools?	The company formulates all products that it sells under the Smart Snacks in School program in the same way for sales outside schools. The company has a commitment to bring up to the same nutrition standards the formulation of all products sold to schools under the Smart Snacks program. No commitment to formulate all products that it sells under the Smart Snacks in School program in the same way for the sales outside schools or NA
	Performance	
6 ♥	Can the company provide evidence of having introduced new healthy products in the US in the last three years?	
7 ♥	Company's products that meet 'composite healthy standard'	
7.1	Percentage of company's products that met its 'composite healthy standard' by the end of FY 2016 in the US market?	
7.2	By what percentage has the number of products that meet the company's 'composite healthy standard' increased between FY 2012 and the end of FY 2016 in the US market?	
8 ♥	Across how many brands does the company offer products that meet the company's overall healthy standard for adults in the US market?	At least one product in all brands At least one product in at least half of its brands Fewer, or no information

² This Criterion asks questions about nutrients. If a nutrient is not relevant for a company related questions will be made not applicable.

B1 Product formulation ²		Product Category 1-5
US		
9 ♥	Products that meet the healthy standard for children under 12	
9.1	What percentage (by number of products) of your US portfolio meet the standard to children under 12 in 2016 (according to own NPS or to the CFBAI nutrition criteria (if a member):	
9.2	What percentage (by number of products) of your US products in relevant categories meet the Smart Snacks nutrition standards?	
10 ♥	Across how many brands does the company offer products that meet the company's overall healthy standard for children in the US market	At least one product in all brands At least one product in at least half of its brands Fewer, or no information
11	Smaller sizes packaging of relevant product categories	
11.1	What percentage of confectionary products does the company offer smaller sizes in FY 2016? 100 KCAL per serving or less 150 KCAL per serving or less	
11.2	In FY 2016, what percentage of savoury snacks products does the company offer smaller sizes in FY 2016? 100 KCAL per serving or less 150 KCAL per serving or less	
11.3	In FY 2016, what percentage of ice-cream products does the company offer smaller sizes in FY 2016? 100 KCAL per serving or less 150 KCAL per serving or less	
11.4	In FY 2016, what percentage of carbonated drinks products does the company offer smaller sizes in FY 2016? 100 KCAL per serving or less 150 KCAL per serving or less	
11.5	In FY 2016, what percentage of juice products does the company offer smaller sizes in FY 2016? 100 KCAL per serving or less 150 KCAL per serving or less	
11.6	In FY 2016, what percentage of confectionary products does the company offer smaller sizes in FY 2016? 100 KCAL per serving or less 150 KCAL per serving or less	
11.7	In FY 2016, what percentage of Asian specialty drinks products does the company offer smaller sizes in FY 2016? 100 KCAL per serving or less 150 KCAL per serving or less	
Nutrient targets		

B1 Product formulation ²		Product Category 1-5
US		
	Commitment	
	Largest product categories 1 - 5	
12	Salt/sodium targets	
12.1	Has the company already reformulated all products in the category and reached the salt/ sodium target/threshold?	Yes
		No
	If no,	More than 80%
		Between 50% - 79%
	Has the company set a target to reduce levels of salt/ sodium and, if so, for what percentage of relevant products in the category?	Between 25% - 49%
		Less than 25%
		No salt/ sodium target
12.2	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.
13	Saturated fats targets	
13.1	Has the company already reformulated all products in the category and reached the saturated fats target/threshold?	Yes
		No
	If no,	More than 80%
		Between 50% - 79%
	Has the company set a target to reduce levels of saturated fats and, if so, for what percentage of relevant products in the category?	Between 25% - 49%
		Less than 25%
		No saturated fats target
13.2	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.
	Added sugars targets	
14	Did the company set an added sugar target/ threshold or a calorie reduction target/ threshold	Added sugar
		Calorie
	If added sugars	
14.1	Has the company already reformulated all products in the category and reached the added sugars target/threshold?	Yes
		No
	If no,	More than 80%
		Between 50% - 79%
	Has the company set a target to reduce levels of added sugars and, if so, for what percentage of relevant products in the category?	Between 25% - 49%
		Less than 25%
		No added sugar target
14.2	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.
	If calories:	
14.1	Has the company already reformulated all products in the category and reached the calorie target/threshold?	Yes
		No
	If no,	More than 80%
		Between 50% - 79%
		Between 25% - 49%
		Less than 25%

B1 Product formulation ²		Product Category 1-5
US		
	Has the company set a target to reduce levels of calories in the US market and, if so, for what percentage of relevant products in the category?	No calorie target
14.2	Baseline and target year:	The company has specified a baseline year from which the reduction will be made/threshold will be reached The company has set a target year by when the reduction will be made/threshold will be reached
15	Fruit targets	
15.1	Has the company already reformulated all products in the category and reached the fruit target/threshold? If no, Has the company set a target to increase the levels of fruit and, if so, for what percentage of relevant products in the category?	Yes No More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No fruit target
15.2	Baseline and target year: (For information only, i.e. not scored)	The company has specified a baseline year from which increases in fruit content will be made. The company has set a target year by when increases in fruit content will be achieved.
16	Vegetables targets	
16.1	Has the company already reformulated all products in the category and reached the vegetable target/threshold? If no, Has the company set a target to increase the levels of vegetables and, if so, for what percentage of relevant products in the category?	Yes No More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No vegetables target
16.2	Baseline and target year: (For information only, i.e. not scored)	The company has specified a baseline year from which increases in vegetable content will be made. The company has set a target year by when increases in vegetable content will be achieved.
17	Wholegrain targets	
17.1	Has the company already reformulated all products in the category and reached the wholegrain target/threshold? If no, Has the company set a target to increase levels of wholegrain and, if so, for what percentage of relevant products in the category?	Yes No More than 80% Between 50% - 79% Between 25% - 49% Less than 25% No wholegrain target
17.2	Baseline and target year: (For information only, i.e. not scored)	The company has specified a baseline year from which increases wholegrain will be made. The company has set a target year by when increases in wholegrain will be achieved.

B1 Product formulation ²		Product Category 1-5
US		
	Performance	
18	What percentage of all relevant products (by number) met the company's sodium/salt target by FY 2016?	
19	What percentage of all relevant products (by number) met the company's added sugar target by FY 2016?	
19	What percentage of all relevant products (by number) met the company's calorie target by FY 2016?	
20	What percentage of all relevant products (by number) met the company's saturated fat target by FY 2016?	
21	What percentage of the company's relevant products (by number) provided one serving or more of fruit (within one serving) by the end of FY 2016?	
22	What percentage of the company's relevant products (by number) provided one serving or more of vegetables (within one serving) by the end of FY 2016?	
23	What percentage of company's relevant products (by number) included wholegrains by the end of FY 2016??	
	Disclosure	
24	Does the company disclose:	Spending on R&D (indicator 2) Targets for R&D spending on nutrition-related projects (indicator 3) Commitment to formulate similarly all products that it sells under the Smart Snacks in School program in the same way for the sales outside schools. (Indicator 5)
25	Does the company disclose:	(Indicator 17) All targets/thresholds relating to this product category Some targets/thresholds relating to this product category No or no information
26	Does the company disclose:	The number of new healthy products launched (Indicator 6)
27	Does the company disclose:	The percentage of products that meet its composite healthy standards? (Indicator 7)
28	Does the company disclose:	(Indicator 24) Percentage of all relevant products that met all the company's nutrient targets Percentage of some relevant products that met all the company's nutrient targets No or no information
29	Does the company disclose:	The percentage of its products that can be marketed to children? (Indicator 9.1)

B2 Nutrient profiling system		
US		
No.	Nutrition	
	Performance	
1	Does the company have an NPS? (For information only, i.e. not scored):	Yes
		No or no information
	If yes	
2	In respect of the 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
3	How did the company develop its NP System?	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
4	Which products and categories are covered by the NP system?	All products and products categories
		Some products and product categories
		None or no information
5	What types of food components does the NP system assess?	Both positive and negative food components
		Negative food components only
		No information
	Disclosure	
6	How/where does the company publish its NP system to allow consumers and other stakeholders to assess and understand it?	In peer-reviewed journal
		In full by the company itself
		Limited information or on request only
		Not published

Category C Delivering affordable, accessible products

C1 Product pricing		
US		
No.	Nutrition	
Commitments		
1 ♥	Does the company make a commitment to address the affordability of its healthy products in the US market?	<ul style="list-style-type: none"> Clear commitment made for whole business, with particular reference to priority populations Clear commitment made for whole business without particular reference to priority populations Broad commitment with particular reference to priority populations No commitments/no information
2	Has the company codified its affordability commitment with respect to healthy products within a formal policy?	<ul style="list-style-type: none"> Policy that applies to all product categories Policy that applies only to some product categories Policy under development No or no information
3	Which targets has the company set for the US market? (Tick all that apply)	<ul style="list-style-type: none"> Number of consumers to reach with affordably priced healthy products by set date Number of units or sales value target for affordably priced healthy products by set date Achieve a particular price point for healthy products Narrow the price differential on healthy vs. less healthy products Targets set with particular reference to priority populations No commitments/no information
Performance		
4	How senior is the person to whom the company allocates the responsibility for implementing the affordability policy?	<ul style="list-style-type: none"> Named executive Named manager No responsibility allocated
5 ♥	Can the company demonstrate that it has done analysis on appropriate pricing of healthy products for priority populations in the US? (Tick all that apply)	<ul style="list-style-type: none"> Yes No
6	Can the company provide evidence that it reached its targets or that it is working towards its targets?	<ul style="list-style-type: none"> Strong evidence Weak evidence None / No information
Disclosure		
7	Does the company disclose: (Tick all that apply)	<ul style="list-style-type: none"> Commitment to address the affordability of its healthy products in the US market. (Indicator 1) Policy on affordability with respect to healthy products (Indicator 2) Named person with responsibility (Indicator 4) Commentary on availability of affordable options for priority populations (Indicator 6)

C2 Product distribution		
US		
No.	Nutrition	
Commitments		
1 ♥	Does the company make a clear and specific commitment to address the accessibility of healthy products in the US?	Clear commitment made for whole business, with particular reference to priority populations
		Clear commitment made for whole business without particular reference to priority populations
		Broad commitment with particular reference to priority populations
		No commitments/no information
2	Has the company codified its commitment within a policy on commercial distribution of its healthy products?	Policy that applies to all product categories
		Policy that applies only to some product categories
		Policy under development
		No policy / no information
3	Does the company commit to ensuring that at least some of the products it donates to commercial public health and nutrition programs/organisations (e.g. Feeding America individual food banks) are healthy?	Yes
		No / no information
4	Has the company set targets in the following area: (Tick all that apply)	Number of new consumers of healthy products to reach through improved distribution
		Number of priority populations to reach with healthy products through improved distribution in urban deserts
		Number of units or sales value targets for healthy products related to extended distribution
		Number of new retail partners to achieve extended accessibility goals
		Number of priority consumers to reach with healthy products through improved distribution in rural deserts
		Investment planned in improving accessibility of healthy products
Performance		
5	How senior is the person to whom the company allocates the responsibility for implementing the affordability policy?	Named executive
		Named manager
		No responsibility allocated
6	Can the company demonstrate that it has done analysis of the accessibility of healthy products to priority populations in the US?	Urban poor
		Rural poor
		Priority ethnic populations
		Vulnerable age groups
		None or no information
7 ♥	Can the company demonstrate that it is making progress to achieving the targets that it sets out in indicator 4?	Strong evidence
		Weak evidence
		No evidence
8	Can the company provide evidence of donating healthy products to non-commercial public health and nutrition programs/organisations e.g. Feeding America individual food banks?	100%
		More than 80%
		More than 60%
		No evidence
Disclosure		

C2 Product distribution		
US		
9	Does the company disclose: (Tick all that apply)	Commitment to address the accessibility of healthy products (Indicator 1) Commitment to donate only healthy products to food-access/food insecurity programs/organizations e.g. Feeding America individual food banks (Indicator 3) Accessibility targets (Indicator 4) Named person with responsibility (Indicator 5) Commentary on availability of healthy options for priority populations (Indicator 8)

Section 3 - Influencing consumer choice and behaviour

Category D Responsible marketing policies, compliance and spending

D1 Marketing policy: all consumers		
US		
No.	Nutrition	
1a	Does the company have its own policy on responsible marketing in the US (that goes beyond the ICC Framework)?	Yes
		No or no information
1b	Does the company commit to the ICC Framework?	Yes
		No or no information
Commitments		
2	The company has a responsible marketing policy that applies to all consumers in the US that applies explicitly to the following media: (Tick all that apply)	TV & radio
		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)
		Mobile and sms marketing
		Cinema
		Outdoor marketing
		In-store marketing/point of sales marketing
		Sponsorship
3	The company's policy includes the following commitments related to the representation of products: (Tick all that apply)	Product placement i.e. in movies or TV shows
		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)

D1 Marketing policy: all consumers

US	
	<p>Commits not to use any models with a BMI of under 18.5 (Industry best practice)</p> <p>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)</p> <p>Commits to presenting products in the context of a balanced diet (industry best practice)</p> <p>All of the above</p>
4	<p>Does the company make an explicit commitment to developing and delivering marketing strategies for healthy products tailored to reaching priority populations in the US?</p> <p>Yes</p> <p>No or no information</p>
5	<p>Can the company provide evidence of taking steps to understand and reach priority populations through targeted marketing of healthy products? (Tick all that apply)</p> <p>Has done research to generate consumer and marketing insights relating to marketing of healthy products to priority populations</p> <p>Can demonstrate use of multiple communication channels from mass to social media to reach specific priority populations with marketing of healthy products</p> <p>Has worked with creative agencies to ensure communication of healthy products is compelling and attractive to specific priority populations</p> <p>Has worked with behavioral specialists to inform design of communications of healthy products to drive desired behavior change</p>
Disclosure	
6	<p>Does the company publish its policy (or pledge to support the ICC Code), which is publicly available?</p> <p>(Indicator 3)</p> <p>Yes, in full</p> <p>Yes, in summary, not including details of scope of application</p> <p>No</p>
7	<p>Does the company disclose:</p> <p>The commitment on developing and delivering healthy food marketing strategies intended for priority consumers (Indicator 4)</p>

D2 - Auditing and compliance with policy: All consumers		
US		
Nutrition		
Performance		
1	Does the company audit its compliance in the US with its policy?	Yes No/no information
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	Does the company disclose information about its audit?	Indicator 1 Yes No

D3 - Spending: Advertising focus: All consumers			
US	Global		
No.	Nutrition		
Commitments			
1		Does the company have a commitment to increase its marketing spending on healthy products in the US? (For information only, i.e. not scored)	Yes No
Performance			
2		What percentage of the total marketing budget is allocated to marketing healthy products: (for information only, i.e. not scored)	0-15% 16%-25% 26%-40% 41%-50% Above 50%
3		Can the company provide for the five largest categories the % marketing budget allocated for marketing healthy options as percentage of the total category marketing budget?	

D4 - Marketing Policy: Children			
US			
No.	Nutrition		
Commitments			
1		Does the company support the CARU guidelines?	Yes No or no information
2		Approach to policy on marketing to children (For information only, i.e. not scored)	The company is a member of CFBAI and has its own policy that goes beyond CFBAI commitments The company is a member of CFBAI and follows only those commitments The company is not a member of the CFBAI
		For CFBAI members only:	Does the company apply its own NPS to identify healthy products covered by its policy?

D4 - Marketing Policy: Children		
US		
		Does the company use the CFBAI nutrition criteria to identify healthy products covered by its policy?
3 ♥	Do the company's responsible marketing commitments related to children apply explicitly to the following media covered CFBAI: (Tick all that apply)	TV
		Radio
		Print
		Third-party websites
		Company-owned websites primarily directed to children under 12
		Video and computer games rated 'Early Childhood'
		DVDS of movies rated G and other DVDs whose content is primarily directed to children under 12
		Mobile media primarily directed at children under 12 including cell phones, smart phones, tablets other personal digital devices or word of mouth/viral forms of marketing
		Interactive games that incorporate foods or beverages
		Product placement i.e. in movies or TV shows
4 ♥	Do the company's responsible marketing commitments related to children apply explicitly to the following additional media not covered by CFBAI: (Tick all that apply)	Social media (FB, YouTube, Twitter feeds of the company or brands, blogs and podcasts)
		In films rated G, PG and PG-13
		Outdoor marketing (is this included in CFBAI print?)
		In-store marketing/point-of-sales marketing
		Sponsorship of events (e.g. sporting, cultural etc)
5 ♥	Does the company commit to: (Tick all that apply)	Support the role of parents or others responsible for guiding diet and lifestyle choices or not to undermine the role of parents or other responsible for guiding diet and lifestyle choices
		Ensuring that marketing materials contain an educative message in relation to healthy diets and lifestyles
		Not showing children engaging in other activities while eating (e.g. watching television, using screens, walking, playing)
		No to mislead children about the emotional, social or health benefits of consuming the product
6 ♥	Does the company commit to using responsible marketing techniques? (Tick all that apply)	Commits not to create a sense of urgency
		Commits not to use inappropriate price minimization
7 ♥	Does the company commit to representing foods fairly? (Tick all that apply)	Objective claims are backed up with adequate substantiation, as would be understood by a child
		The nutritional content of products and the benefits of consumption are fairly and accurately represented

D4 - Marketing Policy: Children		
US		
8 ♥	Does the company commit to clearly differentiating marketing and branding? (Tick all that apply)	To clearly display the company or brand name when advertising on virtual media
		To clearly differentiate, by labeling, advertising and content on virtual media
		Not to brand merchandise aimed at children except related to healthy products
		Only to place products in programs, games, etc. that meet the company's healthy food standard
9 ♥	Does the company commit to use celebrities responsibly or not at all? (Tick all that apply)	Commits not to sponsor materials or people or activities popular with children except in conjunction with healthy products
		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
10 ♥	With respect to fantasy and animated characters: (Tick all that apply)	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 additional media to those included in CFBAI pledge
		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, for CFBAI covered media only
		Pledges not to use its 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 its 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
11 ♥	With respect to promotional toys, games, vouchers and competitions: (Tick all that apply)	Promotional games, toys, vouchers, competitions etc. are used only in relation to healthy foods
		No commitment
12 ♥	Advertising to children aged 2-6	
12.1	What percentage audience threshold for children aged 2-6 does the company use to restrict its advertising on measured media?	<25%
		26 - 35%
		>35%
		>50%
		No audience threshold
12.2	What kind of products does the company advertise to children aged 2-6?	No products
		Healthy products only

D4 - Marketing Policy: Children		
US		All products
13 ♡	Advertising to children aged 7-12	
13.1	What percentage audience threshold for children aged 7-12 does the company use to restrict its advertising on measured media?	<input type="checkbox"/> <25% <input type="checkbox"/> 26 - 35% <input type="checkbox"/> >36% <input type="checkbox"/> >50% <input type="checkbox"/> No audience threshold
13.2	What kind of products does the company advertise to children aged 7-12?	<input type="checkbox"/> No products <input type="checkbox"/> Healthy products only <input type="checkbox"/> All products
14 ♡	Advertising to children aged 13 and over:	
14.1	What percentage audience threshold for children aged 13 and over does the company use to restrict its advertising on measured media?	<input type="checkbox"/> <25% <input type="checkbox"/> 26 - 35% <input type="checkbox"/> >35% <input type="checkbox"/> >50% <input type="checkbox"/> No audience threshold
14.2	What kind of products does the company advertise for children aged 13 and over?	<input type="checkbox"/> No products <input type="checkbox"/> Healthy products only <input type="checkbox"/> All products
15 ♡	Does the company utilize tools to ensure that its online marketing deters certain age groups? (Tick all that apply)	<input type="checkbox"/> Ensuring design of websites/pages is appropriate to over 12s predominantly, i.e. not designed to attract younger children <input type="checkbox"/> Age screening prior to logging on/registering (e.g. enter DOB or require parent to consent) <input type="checkbox"/> Review of traffic data to determine demographic visiting sites <input type="checkbox"/> Ensuring adverts are designed deliberately not to appeal to children younger than 12 <input type="checkbox"/> Nature of third-party websites chosen to advertise on (i.e. ages targeted)
16 ♡	To which online media does the company apply the tools listed above?	<input type="checkbox"/> Own its own corporate and brand websites, third party websites and mobile media <input type="checkbox"/> Only two of the three <input type="checkbox"/> Only one of the three or not clear <input type="checkbox"/> No separate consideration of how to address 'child audience' for these media
	Marketing in and around schools	
17 ♡	To what extent does the company commit to a responsible marketing approach near and in Pre-K through Elementary schools (and/or any schools with children up to age 11)? (Tick all that apply)	<input type="checkbox"/> No marketing or advertising in such schools <input type="checkbox"/> Only marketing/advertising 'healthy' products in primary schools in agreement with schools/parents <input type="checkbox"/> Commitment extends to places near primary schools

D4 - Marketing Policy: Children		
US		
		<p>Commitment applies explicitly to new media marketing/advertising techniques</p> <p>Commitment includes only offering 'educational materials' when in agreement with schools/parents</p> <p>The company does not commit to this or no information</p>
18 ♥	Which types of marketing are covered by the company's commitment relating to Pre-K through Elementary schools?	<p>Signs, scoreboards or posters</p> <p>Educational materials (e.g. text or work books, curricular, websites for educational purposes, other)</p> <p>Vending machines, food or beverage cups or containers, food display racks, coolers</p> <p>School equipment, e.g. pencils, notebooks, textbook covers, other stationery supplies</p> <p>School uniform or sports uniform</p> <p>Advertisements in school publications, on school radio stations, in-school TV, computer screen savers, school-sponsored or used internet sites, announcements on the PA system</p> <p>Fundraisers or sponsored programs linked to companies, to encourage purchases etc (e.g. McTeacher's night, Campbell's Labels for Education, General Mills box tops for Education etc)</p> <p>Corporate incentive programs that reward or provide children with free or discounted foods or beverages</p> <p>School buses</p> <p>Market research activities (taste tests, coupons, free samples)</p> <p>No marketing or advertising in such schools</p>
19 ♥	To what extent does the company commit to a responsible marketing approach near and in middle and high schools (for children between the ages of 12 and 18)? (Tick all that apply)	<p>No marketing or advertising in middle or high schools</p> <p>Only marketing/advertising 'healthy' products in such schools in agreement with schools/parents</p> <p>Commitment extends to places near such schools</p> <p>Commitment applies explicitly to new media marketing/advertising techniques</p> <p>Commitment includes only offering 'educational materials' when in agreement with schools/parents</p> <p>The company does not commit to this or no information</p>
20 ♥	Which types of marketing are covered by the company's commitment relating to middle and high schools?	<p>Signs, scoreboards or posters</p> <p>Educational materials (e.g. text or work books, curricular, websites for educational purposes, other)</p>

D4 - Marketing Policy: Children

US		
		<p>Vending machines, food or beverage cups or containers, food display racks, coolers</p> <p>School equipment, e.g. pencils, notebooks, textbook covers, other stationery supplies</p> <p>School uniform or sports uniform</p> <ul style="list-style-type: none"> • Advertisements in school publications, on school radio stations, in-school TV, computer screen savers, school-sponsored or used internet sites, announcements on the PA system <p>Fundraisers or sponsored programs linked to companies, to encourage purchases etc (e.g. McTeacher's night, Campbell's Labels for Education, General Mills box tops for Education etc)</p> <p>Corporate incentive programs that reward or provide children with free or discounted foods or beverages</p> <p>School buses</p> <p>Market research activities (taste tests, coupons, free samples)</p> <p>No marketing or advertising in such schools</p>
21 ♥	To what extent does the company commit to a responsible marketing approach in other places where children gather (after-school clubs, Boys and Girls Clubs, YMCAs, other childcare and other educational establishments, family and child clinics, pediatric services or other health facilities, amusement parks or zoos, sporting or cultural events held at those premises)	<p>No marketing or advertising in and near these settings</p> <p>No marketing or advertising in these settings</p> <p>Only marketing/advertising healthy products near these settings in consultation with their management and users (but not in them)</p> <p>Only marketing/advertising healthy products in and near these settings in consultation with their management and users</p> <p>No commitment to one of the above options or no information</p>
22 ♥	Which types of marketing are covered by the company's commitment relating to other places where children gather?	<p>Signs, brochures or posters inside or outside the buildings or facilities</p> <p>Vending machines, food or beverage cups or containers, food display racks, coolers</p> <p>Toys or equipment</p> <p>Clothing</p> <p>Fundraisers or sponsored programs linked to companies, to encourage purchases</p> <p>Corporate incentive programs that reward or provide children with free or discounted foods or beverages</p> <p>Market research activities (taste tests, coupons, free samples)</p> <p>No marketing or advertising in such schools</p>
	Disclosure	
23	Does the company disclose	<p>Commitment (Indicator 4)</p> <p>Yes, policy or Pledge that is published in full</p> <p>Yes, policy or Pledge published in summary only</p> <p>Does not publish a policy on or covering marketing to children in the US</p>

D5 Auditing and compliance with policy: Children		
US		
No.	Nutrition	
	Performance	
1	Does the company audit its compliance with its policy on marketing to children?	Yes No or no information
2	Is the audit conducted by:	Compliance is assessed by an industry association or pledge organization The company conducts an internal audit No audit/no information
3	How often is the audit undertaken?	Annually Less frequently than annually No information
4	Which media are covered by the audit:	Audits extend beyond CFBAI covered media Audits cover CFBAI covered media only Audits cover fewer media than CFBAI No audit
5	What is the company's individual compliance level for TV and digital marketing? (%)	
5.1	Individual compliance level for measured media	Over 90% Less than 90% or no reporting
5.2	Individual compliance level for measured digital media	Over 90% Less than 90% or no reporting
6	Does the company have a clear commitment to corrective action?	Clear commitment to corrective action, if needed No commitment to corrective action
7	Has the company had any complaints against it upheld by CARU in the last 3 years?	No Yes
	Disclosure	
8.1	Does the company disclose: (Indicator 5.1)	Its individual compliance level for TV Disclosure of only aggregate industry compliance level
8.2	Does the company disclose: (Indicator 5.2)	Its individual compliance level for digital media based on an audit of multiple markets Disclosure of only aggregate industry compliance level

D6 Advertising Focus (CHILDREN) and Policy Impact		
2018		
No.	Nutrition	
	Commitments	
1	Does the company have a commitment to increase its marketing of healthy products to children? (For information only, i.e. not scored)	Yes No or no information
	Performance	

D6 Advertising Focus (CHILDREN) and Policy Impact		
2018		
2	<p>What percentage of the total marketing spend on marketing to children for each media channel is dedicated to healthy products aimed at children in FY2015/16: (For information only, i.e. not scored)</p> <p>Traditional media Digital media</p>	
	Disclosure	
3	Does the company disclose:	<p>Commitment (Indicator 1)</p> <p>Data on increased spending on marketing healthy products directed to children (Indicator 2)</p>

Category E Supporting healthy diets and active lifestyles

E1 Supporting employee health & wellness		
US		
No.	Nutrition	
Commitments		
1	Does the company make a commitment to support employee health and wellness in the US through a program focused on nutrition, diet and activity?	Yes No or no information
2	Does the company set a target for employee participation in its health and wellness programs in the US?	More than 70% of employees to participate in one year Between 30% - 69% to participate in one year Broad objectives No targets
3	Which expected outcomes does the company articulate in relation to the nutrition, diet and activity element of its health and wellness program?	Clear articulation of expected health and business outcomes Clear articulation of expected health outcomes only No reference to expected outcomes or focus on business outcomes only
New facilities		
4.1	Has the company built any new offices in the last three years? (For information only, i.e. not scored)	Yes No or no information
4.2	If so, has it incorporated architectural or design features to encourage activity in the workplace?	Yes No or not applicable
Performance		
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

E1 Supporting employee health & wellness		
US		
		Awards for staff making good progress
		Other: counselling sessions, work life balance sessions etc.
		No program
6	To whom across the whole company and all operations is the company's program available?	The program is available to all employees and to family members
		The program is available to some employees and family members
		The program is available to all employees but not family members
		The program is available to some employees but not family members
		No or no information
7	How much % of US staff participated in the healthy diet, body, behavior parts of the wellness programs in the US in 2016?	Above 50%
		Between 25 and 49%
		Between 1 - 24%
		No information/less than 1%
8	How does the company evaluate the health impact of the nutrition, diet and activity elements of its health and wellness programs?	Independent evaluations undertaken for at least one site.
		Company does own evaluations for at least one site.
		No or no information
9	Can the company demonstrate the health improvements delivered by the nutrition, diet and activity elements of its health and wellness program?	Both quantitative and qualitative results
		Only qualitative results
		No or no information
	Disclosure	
10	Does the company disclose: (Tick all that apply)	Commitment to support employee health and wellness through a program focused on nutrition, diet and activity (indicator 1)
		Targets for employee participation in its health and wellness programs (indicator 2)
11	Does the company disclose:	Expected health outcomes (indicator 3)
		Expected business outcomes (indicator 3)
12	Does the company disclose:	Quantitative information on the outcomes of the nutrition, diet and activity elements of its health and wellness program (indicator 9)
		Narrative and/or qualitative information about the results of the program (indicator 9)
13	Does the company disclose:	Full evaluation (indicator 8)
		Summary evaluation (indicator 8)

E2 Supporting breastfeeding mothers at work		
US		
No.	Nutrition	
	Commitments	
1	Does the company commit to providing breastfeeding mothers with appropriate working conditions and facilities at work in the US?	Yes, set out in a policy
		Make a commitment, but no formal policy
		No or no information
2	Does the company's maternity policy allow women to take paid maternity leave?	6 months or more
		Between 3 and 6 months
		Up to 3 months or less
	Performance	
3	Does the company provide facilities that support breastfeeding mothers?	
	Provide private, hygienic, safe rooms for expressing breast-milk?	Yes No or no information
	Offer flexible working arrangements to support breastfeeding mothers?	Yes No or no information
	Disclosure	
4	Does the company disclose:	Its policy on supporting breastfeeding mothers (indicator 1)
		No or no information
5	Does the company publish a commentary about how it supports breastfeeding mothers within the workplace?	Yes (indicator 3)
		No or no information

E3 Supporting public health and nutrition programs		
US		
No.	Nutrition	
	Commitments	
1	For public health and nutrition programs the company supports, does it have:	
1.1	For healthy eating/nutrition education programs for its consumers and/or local communities:	Commitment to align programs to national dietary guidelines
		Clear policy that excludes brand-level sponsorship (as opposed to corporate branding)
		No commitment or only to offer own programs
1.2	For active lifestyle programs for its consumers and/or local communities?	Clear policy that excludes brand-level sponsorship (as opposed to corporate branding)
		No or no information
1.3	For food insecurity/food access programs	Clear policy that excludes brand-level sponsorship (as opposed to corporate branding)
		No or no information
2	What types of public health and nutrition programs does the company commit to supporting?	That are underpinned by a sound evidence base
		That have been designed with expert advice
		That draw on stakeholder inputs
3	Has the company set out the health outcomes it seeks to achieve through the public health and nutrition programs it supports: (i.e. those that support nutrition education, physical activity and/or food insecurity) are designed to achieve?	Specific health outcomes participants in the program should benefit from are clearly articulated for all programs
		Specific health outcomes participants in the program should benefit from are clearly articulated for some programs

E3 Supporting public health and nutrition programs		
US		
		Broad public health benefits are set out for each program, or goals for participation or reach, but health outcomes expected for participants are not set out.
		No such health benefits are set out
	Performance	
4	Does the company fund programs that educate consumers about: (Tick all that apply)	Benefits of a healthy balanced diet Importance of fresh fruit and vegetables Importance of being active Importance of regular meals and/or limited snacking Importance of drinking water Benefits of exclusive breastfeeding Benefits of safe, timely and adequate complementary feeding for infant and young children
5	Does the company evaluate all or some of the programs' impacts independently?	In all cases, embedded in design of programs In some cases No or no information
	Disclosure	
6	Does the company disclose:	Document that outlines the company's public health and nutrition programs that it commits to support (Indicator 1) Document that sets out its policy on brand-level sponsorship (Indicator 1)
7	Does the company disclose:	A description of the evidence base for the design of its public health and nutrition programs (Indicator 2) A description of the expert advice it has solicited (Indicator 2) A description of the stakeholders it has consulted to design the programs (Indicator 2)
8	Does the company disclose:	Specific health outcomes are clearly articulated for all programs (Indicator 3) Specific health outcomes are clearly articulated for some programs (Indicator 3) Broad public health benefits are set out (Indicator 3)
9	Does the company disclose:	The health outcomes achieved by each of its public health and nutrition programs (Indicator 4) The health outcomes achieved by some of its public health and nutrition programs (Indicator 4) Information about the reach of/participation in its programs (Indicator 4) No information about the programs it supports or offers (Indicator 4)
10	Does the company disclose:	All of the independent evaluations carried out for the programs it supports (Indicator 5) Some of the independent evaluations carried out for the programs it supports (Indicator 5)

Category F Product labelling and use of health and nutrition claims

F1 Product labelling		
US		
No.	Nutrition	
	Commitments	
1	Does the company commit to provide Back-of-Pack nutrition information on total or added/free sugars?	Yes No
	Commitments for Front of pack labelling	
2	How does the company provide information on the front of pack?	In an interpretative format, providing indicators of how healthy the product is, rather than just numeric information Numeric information only, but showing % of recommended 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
	Performance	
3	What percentage of the company's products carry a front-of-pack labeling?	More than 80% Between 50 - 79% Between 6 - 49% Less than 5%
	Disclosure	
8	For what percentage of products does the company provide the nutrition panel online? (Indicator 3)	For 90% or more of products For between 50 - 90% of products For between 10 - 49% of products No nutrition information published or for less than 10% of products No information (indicator 6)

Category G Influencing governments and policymakers, and stakeholder engagement

G1 Lobbying and influencing governments and policymakers		
US		
No.	Nutrition	
	Commitments	
1	Does the company commit to:	No lobbying at all Only to engage with governments, political parties, policymakers and policymaking bodies in support of measures to prevent and address obesity and diet-related chronic diseases No or no information
	If second answer option,	Lobbying conducted by third parties paid by the company Lobbying conducted by the company only No or no information
	Disclosure	
2	Does the company disclose:	Its policy on lobbying and donations or Code of Business Ethics etc. (indicator 1)

G1 Lobbying and influencing governments and policymakers		
US		
3	Does the company publish: (Tick all that apply)	Its membership of industry associations, lobbyists (individuals or groups), think tanks, interest groups or other organizations that lobby on its behalf Its financial support for these organizations Any potential governance conflicts of interest (or state that none exist) Board seats at industry associations and on advisory bodies related to nutrition issues
4	Publication of its activities	
4.1	Does the company publish a commentary or make other disclosures about its lobbying activities against government measures to combat obesity and diet-related chronic diseases?	Yes No
4.2	Does the company disclose its policy position used in lobbying/governmental engagement, on the following, in its home market: (Tick all that apply)	School nutrition Front-of-pack labelling Fiscal instruments related to nutrition (e.g. soda/sugar tax) Food marketing to children Government Funded Nutrition Programs

G2 Stakeholder engagement		
US		
No.	Nutrition	
	Commitments	
1	Does the company commit to engage with stakeholders in developing nutrition policies/programs in the US?	Yes No or no information
	Performance	
2	What form of engagement does the company have with stakeholders?	Comprehensive, well-structured and focused on business strategy and performance Limited; typically one-way communication rather than engagement, and more ad-hoc No information
3	Can the company provide evidence of engagement with stakeholders on its commercial nutrition activities?	Extensive engagement with stakeholders Limited engagement with stakeholders No or no information
4	Can the company provide evidence of engagement with stakeholders on addressing non-commercial public health and nutrition in the US?	Extensive engagement with stakeholders Limited engagement with stakeholders No or no information
	Disclosure	
5	Does the company disclose:	Commitment to engage with stakeholders in developing nutrition policies/programs (indicator 1) Specific examples of how input has been used to adapt policies/programs, i.e. to change business practices (indicator 4) Broad statement about the benefits of stakeholder dialog (indicator 4) No

Appendix I Organizations consulted

Organization	F&B companies
Alive & Thrive	Nestle
Berkeley Media Studies Group, University of California at Berkeley	PepsiCo
CDC	Kellogg
Center for Digital Democracy	Coca-Cola
CFBAI	Mondelez
CSPI	Danone
Duke Global Health Institute, Duke University	Unilever
Food Nutrition Policy Consultants LLC	Mars
Healthy Eating Research	Campbell's
Helen Keller International	Nestlé
Institute for Health Research and Policy, University of Illinois at Chicago	Hershey
Public Citizen	Cargill
Rudd Center	
UNC Gillings School of Public Health	
University of Washington School of Public Health	
US Breastfeeding Committee	
WHO	
1000 Days	

Appendix II

ATNI US Expert Group members

The mandate of the US Expert Group is to provide input into the development of the US Corporate Profile methodology and other aspects of the Index. This group consists of members with expertise in various aspects of nutrition (including health dimensions of obesity and diet-related chronic diseases, marketing, labelling, use of claims, nutrient profiling, regulatory issues etc).

The members of the US 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

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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

Mike Rayner

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

Linda Meyers

Former Director (retired), Food and Nutrition Board, National Academies of Sciences, Engineering, and Medicine, Washington, DC

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