

**ATNI BMS CORPORATE PROFILE
METHODOLOGY**

GLOBAL INDEX 2016

ATNI BMS Corporate Profile methodology 2016

This methodology was developed with extensive input from a wide range of stakeholders and ATNI's Expert Group, during 2014 and 2015. It is based on The International Code of Marketing of Breast-milk Substitutes (The Code), subsequent World Health Assembly (WHA) resolutions, FTSE4Good's breast-milk substitutes (BMS) Criteria and well-established methodologies for assessing companies' management systems and disclosure on other topics used by the corporate and investment sectors.

Table 1 BMS Corporate Profile methodology overview

Section	International Code of Marketing of Breast-milk Substitutes
1	OVERARCHING COMMITMENTS: Commitments relating to the introduction of the International Code
2	ARTICLE 4: Information and education
3	ARTICLE 5: The general public and mothers
4	ARTICLE 6: Health care systems
5	ARTICLE 7: Health workers
6	ARTICLE 8: Persons employed by manufacturers and distributors
7	ARTICLE 9: Labeling
8	ARTICLE 10: Quality
9	ARTICLE 11: Implementation and monitoring
10	Lobbying and influencing governments and policymakers
11	Disclosure

Notes

- Section 1 has policy commitment indicators only.
- Section 11 indicators relate to level of disclosure only.
- All other sections contain two types of indicators: policy commitment indicators and management systems indicators.
- All indicators of all types within all sections are weighted equally.
- In all sections with both types of indicators, each type is weighted 50% for that section, with the exception of Section 9. This section has very few policy commitment indicators and many

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management systems indicators. The former therefore carry 20% weight, and the latter 80% weight.

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Section 1

OVERARCHING COMMITMENTS: Commitments relating to the introduction of the International Code		
No.	Policy commitments	
1	Support for breastfeeding	The company's policy explicitly states support for:
		Exclusive breastfeeding for the first six months and continued breastfeeding for two years or more.
		Exclusive breastfeeding for the first six months.
		Exclusive breastfeeding for the first 4-6 months.
		Breastfeeding generally with no mention of specific age ranges.
		No such commitment.
2	Support for appropriate introduction of complementary foods	The company's policy explicitly states support for the introduction of appropriate complementary foods from the age of six months and not earlier:
		Yes. No such commitment.
3	Acknowledgement of The Code and WHA resolutions	The company's policy explicitly acknowledges the importance of The International Code of Marketing of Breast-milk Substitutes AND subsequent WHA resolutions. ¹
		No such acknowledgement in full.
4	Application to joint ventures and subsidiaries	The company's policy explicitly applies to joint ventures and subsidiaries:
		Where the company has a holding of up to 49% (i.e. minority holding)
		Where the company has a holding of greater than 50% (i.e. majority holding).
		No such commitments. N/A.

Section 2

ARTICLE 4: Information and education		
No.	Policy commitments	
1	Materials intended to reach pregnant women or mothers of infants and young children	The company's policy explicitly states that any informational or educational materials intended to reach pregnant women or mothers of infants and young children (4.2) will include clear information on:
		<ul style="list-style-type: none"> a. The benefits and superiority of breastfeeding. b. Maternal nutrition, and the preparation for and maintenance of breastfeeding. c. The negative effect on breastfeeding of introducing partial bottle-feeding. d. The difficulty of reversing the decision not to breastfeed. e. The proper use of infant formula, whether manufactured industrially or home-prepared.
		No explicit commitment/commitment not made in full.
2	Implications and hazards	The company's policy explicitly states that when such materials contain information about the use of infant formula (4.2) they will include clear information on:
		<ul style="list-style-type: none"> a. The social and financial implications of the use of formula.

¹ No credit is given if the company only acknowledges The Code but not subsequent WHA resolutions.

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		<p>b. The health hazards of inappropriate foods or feeding methods.</p> <p>c. The health hazards of improper use of infant formula and other breast-milk substitutes.</p> <p>The company does not make such commitments in full.</p>
3	Provision of materials and equipment	<p>The company's policy explicitly states that informational and educational materials and equipment covered by Articles 4.2 and 4.3 should not be given to mothers or pregnant women by company representatives, only to health care professionals.</p> <p>The company does not make this commitment in full.</p>
4	Idealizing the use of breast-milk substitutes	<p>The company's policy explicitly states that it will not use any pictures or text that may idealize the use of breast-milk substitutes (4.2).</p> <p>The company does not make such commitments.</p>
5	Donations of informational or educational equipment or materials	<p>The company's policy explicitly states that donations of informational or educational equipment or materials are made only at the request and with the written approval of appropriate government authorities and these materials will not refer to a proprietary product (4.3).</p> <p>The company does not make such commitments in full.</p>
6	Information on pathogenic micro-organisms contents	<p>The company's policy explicitly states that health workers, parents and other caregivers are provided with information that powdered infant formula may contain pathogenic micro-organisms and must be prepared for use appropriately (WHA 58.32).</p> <p>The company does not commit to providing this type of information.</p>
No.	Management systems	
7	Extent and geographic application of management systems	<p>The systems and procedures the company uses to ensure it upholds its commitments relating to informational and educational materials and practices are:</p> <p>Comprehensive and applied globally.</p> <p>Comprehensive but not applied globally.</p> <p>Limited and applied globally.</p> <p>Limited but not applied globally.</p> <p>No evidence.</p>
8	Clear instructions to staff	<p>The company can demonstrate that it provides clear instructions to staff on how to interpret and apply the policy relating to Articles 4.2, 4.3 and resolution WHA 58.32.</p> <p>The company does not provide such guidance.</p>
9	Procedures	<p>The company can demonstrate procedures to implement commitments made relating to 4.2 and 4.3.</p> <p>The company cannot demonstrate such procedures relating to social and financial implications etc. (4.2)</p> <p>The company cannot demonstrate procedures to ensure that it does not use any pictures or text that may idealize the use of breast-milk substitutes in its materials (4.2).</p> <p>The company cannot demonstrate such procedures for 4.3.</p> <p>The company cannot demonstrate such procedures relating to WHA 58.32.</p>

Section 3

ARTICLE 5: The general public and mothers		
No.	Policy commitments	
1	Advertising and other forms of promotion	<p>The company's policy explicitly states that it will not use advertising or other forms of promotion to reach the general public (5.1).</p> <p>The company does not make such a commitment in full.</p>

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2	Samples of products	The company's policy explicitly states that it will not provide directly or indirectly, to pregnant women, mothers or members of their families, samples of products (5.2).
		The company does not make such a commitment in full.
3	Promotion	The company's policy explicitly states that it will not to use point-of-sale advertising, giving of samples, or any other promotion device to induce sales directly to the consumer at the retail level, such as special displays, discount coupons, premiums, special sales, loss-leaders and tie-in sales (5.3).
		The company does not make such a commitment in full.
4	Distribution of gifts	The company's policy explicitly states that it will not distribute to pregnant women or mothers of infants and young children any gifts of articles or utensils which may promote the use of breast-milk substitutes or bottle feeding (5.4).
		The company does not make such a commitment in full.
5	Marketing personnel	The company's policy explicitly states that it will ensure that its marketing personnel do not seek direct or indirect contact of any kind with pregnant women or with mothers of infants or young children (5.5).
		The company does not make such a commitment in full.
No.	Management systems	
6	Extent and geographic application of management systems	The systems and procedures the company uses to ensure it upholds its commitments relating to the general public and mothers are: Comprehensive and applied globally.
		Comprehensive but not applied globally.
		Limited and applied globally.
		Limited but not applied globally.
		No evidence.
7	Clear instructions to staff	The company can demonstrate that it provides clear instructions to staff on how to interpret and apply its policy relating to Article 5.
		The company does not provide such guidance.
8	Procedures	The company can demonstrate procedures to implement commitments made relating to Articles 5.1 – 5.5.
		The company cannot demonstrate such procedures for 5.1.
		The company cannot demonstrate such procedures for 5.2.
		The company cannot demonstrate such procedures for 5.3.
		The company cannot demonstrate such procedures for 5.4.
		The company cannot demonstrate such procedures for 5.5.

Section 4

ARTICLE 6: Health care systems		
No.	Policy commitments	
1	Promotion	The company's policy explicitly states that it will not promote infant formula or other products within the scope of The Code through health care systems (6.2).
		The company does not make such a commitment.
2	Display of products	The company's policy explicitly states that it will not display products within the scope of The Code or distribute materials in health care systems' facilities (except those allowed in Article 4.3) (6.3).
		The company does not make such a commitment.
3	Work in the health care system	The company's policy explicitly states that it will not provide or pay for 'professional service representatives', 'mothercraft nurses' or similar personnel to work in the health care system (6.4).
		The company does not make such a commitment.
4	Demonstrations of feeding	The company's policy explicitly states that none of its staff or representatives will

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		demonstrate feeding with infant formula (6.5).
		The company does not make such a commitment.
5	Donations & low-cost sales	The company's policy explicitly states that it will not make donations or low-cost sales of infant formula or other products within the scope of The Code to organizations within health care systems (per WHA resolutions 39.28, 45.34, 47.5).
		The company does not make such a commitment.
6	Requests for donations	The company's policy explicitly states that when requests are made for donations or low-cost supplies by orphanages or social welfare institutions, the company will consider the requests on a case-by case basis and only supply the amount of product specified and in accordance with any requirements set out by the national authorities.
		The company does not make such a commitment.
		When such requests are made, they will not be considered unless in writing and signed by a senior person with the government/authorities.
		The company does not make such a commitment.
7	Donated equipment and materials	The company's policy explicitly states that equipment and materials donated to a health care system will not refer to any proprietary product within the scope of The Code. (6.8)
		The company does not make such a commitment.
No.	Management systems	
8	Extent and geographic application of management systems	The systems and procedures the company uses to ensure it upholds its commitments relating to health care systems are:
		Comprehensive and applied globally.
		Comprehensive but not applied globally.
		Limited and applied globally.
		Limited but not applied globally.
		No evidence.
9	Clear instructions to staff	The company can demonstrate that it provides clear instructions to staff on how to interpret and apply its policy relating to Article 6.
		The company does not provide such guidance.
10	Procedures	The company can demonstrate procedures to implement commitments made relating to relevant elements of Article 6:
		The company cannot demonstrate such procedures for 6.2.
		The company cannot demonstrate such procedures for 6.3.
		The company cannot demonstrate such procedures for 6.4.
		The company cannot demonstrate such procedures for 6.5.
		The company cannot demonstrate such procedures relating to requests for donations outside the health care system.
		The company cannot demonstrate such procedures for 6.8.

Section 5

ARTICLE 7: Health workers		
No.	Policy commitments	
1	Supplies to health professionals	The company's policy explicitly states that scientific and factual matters and will not imply or aim to create a belief that bottle-feeding is equivalent or superior to breastfeeding (7.2) and also include information specified in Article 4.2.
		The company does not make this full commitment.
2	Financial or material inducements	The company's policy explicitly states that it will not offer any financial or material inducements to health workers or members of their families to promote products (7.3).

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		The company does not make this full commitment.
3	Samples	The company's policy explicitly states that it will not provide health care workers with samples of infant formula or products covered by The Code, complementary foods, utensils or equipment except for the purposes of professional evaluation or research at the institutional level (7.4).
		The company does not make this full commitment.
4	Disclosure of contributions	The company's policy explicitly states that it will disclose to any organization to which a health worker is affiliated any contribution made by the company to a health worker or on his/her behalf in support of fellowships, study tours, research grants, attendance at conferences etc. (7.5 and WHA 49.15 and 58.32).
		The company does not make this full commitment.
No.	Management systems	
5	Extent and geographic application of management systems	The systems and procedures the company uses to ensure it upholds its commitments relating to health workers are: Comprehensive and applied globally. Comprehensive but not applied globally. Limited and applied globally. Limited but not applied globally. No evidence.
6	Clear instructions to staff	The company can demonstrate that it provides clear instructions to staff on how to interpret and apply its policy relating to Article 7. The company does not provide such guidance.
7	Procedures	The company can demonstrate procedures to implement commitments made relating to relevant elements of Article 7: The company cannot demonstrate such procedures for 7.2. The company cannot demonstrate such procedures for 7.3. The company cannot demonstrate such procedures for 7.4. The company cannot demonstrate such procedures for 7.5, and WHA 49.15 and 58.32.

Section 6

ARTICLE 8: Persons employed by manufacturers and distributors		
No.	Policy commitments	
1	Bonus calculations	The company's policy explicitly states that: It will not include within its bonus calculations for sales representatives the volume nor value of sales of products covered by The Code. (8.1). The company does not make such a commitment. It will not to set quotas for the sales of products covered by The Code (8.1). The company does not make such a commitment.
2	Educational functions	The company's policy explicitly states that it will not allow staff involved in marketing BMS products to deliver educational functions to pregnant women or mothers of infants and young children. (8.2). The company does not make such a commitment.
No.	Management systems	
3	Extent and geographic application of management systems	The systems and procedures the company uses to ensure it upholds its commitments relating to persons employed by manufacturers and distributors are: Comprehensive and applied globally. Comprehensive but not applied globally.

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		Limited and applied globally.
		Limited but not applied globally.
		No evidence
4	Clear instructions to staff	The company can demonstrate that it provides clear instructions to staff on how to interpret and apply its policy relating to Article 8. The company does not provide such guidance.
5	Procedures	The company can demonstrate procedures to implement commitments made relating to relevant elements of Article 8. The company cannot demonstrate such procedures for 8.1. The company cannot demonstrate such procedures for 8.2.

Section 7

ARTICLE 9: Labeling		
No.	Policy commitments	
1	Labeling	The company's policy explicitly states that all labeling will (9.1 and 9.2): a. Be clear and conspicuous. b. Provide necessary information about the appropriate use of the product. c. Not discourage breastfeeding. d. Be in all relevant local languages. e. Be easy to read. The company does not make such commitments in full.
2	Containers and labels (information required)	The company's policy explicitly states that its containers and labels will contain (9.2): a. The words "Important Notice". b. A conspicuous statement of the superiority of breastfeeding. c. A statement that the product should be used only on the advice of a health worker as to the need for its use and the proper method of use. d. Instructions for appropriate preparation, and a warning against the health hazards of inappropriate preparation. The company does not make such commitments in full.
3	Containers and labels (prohibited information)	The company's policy explicitly states that its containers and labels will not use (9.2): a. Pictures of infants. b. Other pictures or text which may idealize the use of infant formula. c. The terms 'humanized', 'materialized' or similar terms. The company does not make such commitments in full.
4	Warning label	The company's policy explicitly states that its labels of products marketed for infant feeding which can be modified to make an infant formula, carry a warning label that the unmodified product should not be the sole source of nourishment of an infant (9.3). The company does not make such commitments in full. N/A.
5	Labels (instructions)	The company's policy explicitly states that for infant formula it will include on its labels (9.4): a. Ingredients used. b. Composition/analysis of the product. c. Storage conditions required. d. Batch number and date before which the product is due to be consumed, taking into account local conditions. The company does not make such commitments in full.
6	Health or nutrition claims	The company's policy explicitly states that it will not make any health or nutrition

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		claims on products for infants or young children except where specifically provided for in relevant Codex Alimentarius standards or national legislation (compliance with WHA Resolution 63.23, May 2010). The company does not make such commitments in full.
7	Warning about pathogenic micro-organisms	The company's policy explicitly states that labels of powdered infant formula include an explicit warning that the product may contain pathogenic micro-organisms and must be prepared and used appropriately (WHA 58.32). The company does not make such commitments in full.
No.	Management systems	
8	Extent and geographic application of management systems	The systems and procedures the company uses to ensure it upholds its commitments relating to labeling: Comprehensive and applied globally. Comprehensive but not applied globally. Limited and applied globally. Limited but not applied globally. No evidence.
9	Clear instructions to staff	The company can demonstrate that it provides clear instructions to staff on how to interpret and apply its policy relating to labeling. The company does not provide such guidance.
10	Procedures	The company can demonstrate procedures to implement commitments made relating to relevant elements of Article 9: The company cannot demonstrate such procedures for 9.1. The company cannot demonstrate such procedures for 9.2. The company cannot demonstrate such procedures for 9.3. The company cannot demonstrate such procedures for 9.4. The company cannot demonstrate such procedures for implementing commitments related to WHA 63.23. The company cannot demonstrate such procedures for implementing commitments related to WHA 58.32.

Section 8

ARTICLE 10: Quality		
No.	Policy commitments	
1	Quality standards	The company's policy explicitly states that its products will meet high recognized standards (10.1). The company does not make such a commitment.
2	Meeting Codex standards	The company's policy explicitly states that its products will meet all applicable standards of the Codex Alimentarius Commission and the Codex Code of Hygienic Practice for Foods for Infants and Children (10.2). The company does not make such a commitment.
No.	Management systems	
3	Extent and geographic application of management systems	The systems and procedures the company uses to ensure it upholds its commitments relating to Article 10: Comprehensive and applied globally. Comprehensive but not applied globally. Limited and applied globally. Limited but not applied globally. No evidence.
4	Clear instructions to staff	The company can demonstrate that it provides clear instructions to staff on how to interpret and apply its policy relating to quality and safety.

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		The company does not provide such guidance.
5	Procedures	The company can demonstrate procedures to implement commitments made relating to relevant elements of Article 10 and relevant Codex standards.
		The company cannot demonstrate such procedures for complying with Article 10 and relevant Codex standards

Section 9

ARTICLE 11: Implementation and monitoring		
No.	Policy commitments	
1	Collaboration with governments	The company's policy explicitly states that it will collaborate with governments in their efforts to monitor the application of the Code (11.2). No such statement in full.
2	Responsibility of marketing practices	The company's policy explicitly states that: It is responsible for its marketing practices according to the principles and aim of The Code.
		No such statement.
		It is responsible for taking steps to ensure that its conduct at every level conforms to their policy in this regard.
3	Apprising of marketing personnel	No such statement.
		The company's policy explicitly states that it commits to apprising each member of its marketing personnel of The Code and their responsibilities relating to it (11.5). The company does not make such commitments in full.
No.	Management systems	
4	Responsibility for implementation of the company's BMS policy	The company names a Board member with responsibility for overseeing implementation of the policy.
		The company names an Executive Manager (or function) with responsibility for overseeing the implementation of its commitments.
		The company does not name a Board member or Executive with responsibility for implementing its commitments.
5	Accountability and responsibility	In addition to Board and Executive Management levels, assignment of accountability and responsibility for implementing the BMS policy and procedures is clearly specified as extending to:
		All national business units
		Yes
		No
		Relevant functions, e.g. marketing
		Yes
		No
		Operational level (job descriptions for marketing personnel)
		Yes
		No
6	Communication	Third parties (contractual terms and conditions)
		Yes
		No
		The company appears to have an effective global system for communicating to all relevant employees. The company appears to have a weak system for communicating to all relevant employees.

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		The company cannot demonstrate such a system.
7	Ensuring awareness and training	<p>The company can provide evidence of a comprehensive and effective system to ensure relevant Executives and marketing personnel are aware of their responsibilities under The Code and of the company's own policies.</p> <p>The company can provide evidence of making relevant Executives and marketing personnel aware of their responsibilities under The Code and of the company's own policies but not through a comprehensive and systematic system.</p> <p>The company cannot provide such evidence.</p>
8	Ensuring implementation and awareness of other key parties	<p>The company can demonstrate evidence of procedures relating to distributors: Yes No</p> <p>The company can demonstrate evidence of procedures relating to retailers: Yes No</p> <p>The company cannot provide evidence of procedures relating to retailers.</p>
9	Monitoring compliance with its Policy	<p>The company monitors compliance with its policy: Using external auditors. Using its internal auditing system.</p> <p>The company provides no evidence of monitoring compliance with its policy.</p>
10	Auditing compliance with its Policy	<p>The company conducts its audits: Annually. Less frequently than annually, e.g. once every two years.</p> <p>The company does not appear to conduct audits of its compliance with its policy.</p>
11	Geographic focus of monitoring	<p>Does the company commission audits of compliance with its policy 'on-the-ground'?</p> <p>Yes No</p> <p>If yes</p> <p>In both higher and lower-risk countries Only in in higher-risk countries. Types of countries not specified.</p>
12	Sanctions	<p>The company has a clear set of sanctions/penalties for those employees not complying with the requirements of the policy. The company does not have a clear set of sanctions/penalties.</p>
13	Incentives	<p>The company can demonstrate that it does not offer incentives or compensation to reward performance that could increase the risk of failing to meet the requirements of the policy. The company cannot demonstrate this. The company offers incentives/compensation to reward compliance with the policy. The company cannot demonstrate this.</p>
14	Whistleblowing	<p>The company has established best practice whistleblowing procedures which:</p> <p>Are accessible to all employees: Yes No</p> <p>Enable employees to report outside their normal reporting line: Yes No</p> <p>Protect employees from potential negative consequences of such reporting: Yes</p>

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		No
		Offer employees a way to seek advice or guidance before making a formal complaint: Yes No
		Raise awareness of the whistleblowing procedures among employees: Yes No
15	Investigating alleged non-compliances	
15.1		The company investigates alleged non-compliances in: All countries. Higher-risk countries only. None.
15.2		The company can demonstrate that it has: The company can demonstrate that it has a procedure or communication channel through which stakeholders (i.e. anyone outside the company) can report alleged non-compliances. The company cannot demonstrate such a procedure or communication channel. The company can demonstrate that it has a procedure for recording external stakeholder's allegations of non-compliances. The company cannot demonstrate such a procedure. The company can demonstrate it has systems for investigating in a timely manner to alleged non-compliance with its policy reported by organizations or individuals outside the company. The company cannot demonstrate such systems. The company can demonstrate it has systems for responding to alleged non-compliance with its policy reported by organizations or individuals outside the company, in a timely manner. The company cannot demonstrate such systems.
16	Responding to non-compliances	The company has:
16.1		Clear guidelines on the process for taking corrective action in the event of a non-compliance is confirmed: Yes No Guidelines for employees on potential corrective actions for non-compliances: Yes No Guidelines for all relevant third parties on potential corrective actions for non-compliances: Yes No
16.2		The company has a procedure to track corrective actions on all non-compliances: Yes No
16.3		The company tracks: Allegations of non-compliances (nature of alleged non-compliance, location, date, complainant's details etc.): Yes No Investigation's findings:

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		Yes No Corrective action taken: Yes No
17	Independent verification of monitoring and compliance systems	The company participates in a third party assessment of implementation of its monitoring and compliance systems (e.g. FTSE4Good or similar) Yes No The company does not participate in such an assessment.
18	Internal reporting systems	The company can demonstrate that it produces management reviews and/or an annual summary for the Board: Yes No The summary including corrective actions taken: Yes No The quality and accuracy of the internal reporting systems are independently verified: Yes No
19	Data quality	The company can demonstrate that it has procedures to ensure data quality relating to non-compliances identified: To ensure accuracy of: Yes No To ensure completeness of data: Yes No
20	Annual reporting to the Board	The company can demonstrate that the Board considers annually a summary report of its compliance with its policies and the effectiveness of its management systems. The company does not produce an annual Board summary.

Section 10

Lobbying and influencing governments and policymakers		
No.	Policy commitments	
1	Lobbying and engagement policy	The company has a policy setting out in what circumstances and how it will lobby and engage with governments and policymakers on BMS issues. The company does not have such a policy.
2	Lobbying and engagement objectives	The company sets out its objectives with respect to lobbying and engagement. The company does not set out such objectives.
3	Support for public policy frameworks, international agencies and governments	The company commits not to undermine public policy frameworks, the work of the WHO or similar agencies nor national governments' efforts to develop and implement The Code. The company does not make such a commitment.
4	Standards among trade associations and industry policy groups	The company's policy explicitly states that the company commits to seek to ensure that trade associations and industry policy groups to which it belongs operate to the same standards. The company does not make such a commitment.
No.	Management systems	

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5	Responsibility for policy implementation	The company names an Executive/function with responsibility for implementing the policy on lobbying and engagement.
		The company does not name an Executive or Function.

Section 11

Disclosure		
No.		
1	Introduction to the Code	
		Does the company publish?
		The nature of its support for breastfeeding:
		Yes
		No
		Acknowledgement of the importance of The Code:
		Yes
		No
		Scope of application of its policies re. Joint Ventures and subsidiaries:
		Yes
		No
		Statement about complementary foods and beverages for infants under six months:
		Yes
		No
2	Policies	
		The company publishes its policies relating to all aspects of the assessment.
		The company does not publish its policy relating to:
		Article 4 and relevant WHA resolutions
		Article 5
		Article 6 and relevant WHA resolutions
		Article 7
		Article 8
		Article 9 and relevant WHA resolutions
		Article 10 and relevant WHA resolutions
		Article 11 and relevant WHA resolutions
		Lobbying governments and policymakers on BMS marketing
3	Instructions to staff	
		The company publishes the instructions it provides to staff on how to interpret and apply its commitment relating to all aspects of the assessment.
		The company does not publish the instructions it provides to staff on how to interpret and apply its commitment relating to:
		Article 4 and relevant WHA resolutions
		Article 5
		Article 6 and relevant WHA resolutions
		Article 7
		Article 8
		Article 9 and relevant WHA resolutions
		Article 10 and relevant WHA resolutions
		Article 11 and relevant WHA resolutions
		Lobbying governments and policymakers on BMS marketing
4	Compliance assessment	
		The company publishes information about how it assesses compliance

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		internally with the commitments made relating to all aspects of the assessment.
		The company does not publish information about how it assesses compliance internally with the commitments made relating to:
		Article 4 and relevant WHA resolutions
		Article 5
		Article 6 and relevant WHA resolutions
		Article 7
		Article 8
		Article 9 and relevant WHA resolutions
		Article 10 and relevant WHA resolutions
		Article 11 and relevant WHA resolutions
		Lobbying governments and policymakers on BMS marketing
	Independent audits	
5	Disclosure of audit reports	The company discloses: Full auditors' report(s). Only a summary of the auditors' report(s). No disclosure of auditors' reports.
	Accountability mechanisms	
6	Responsibility for implementing policy on BMS Marketing	The company publishes the name/function of the Board member with responsibility for implementing its policy and commitments. The company does not disclose which Board member has this responsibility.
7	Disclosure of declaration about applying bonus calculations and quotas	The company publishes a declaration each year that it has not included sales of BMS products in bonus calculations.
7.1	Declaration relating to bonus calculations	Yes No
	If yes	Verified Unverified
7.2	Declaration relating to quotas	The company publishes a declaration each year that it has not set quotas for sales of products covered by its policy: Yes No
	If yes	Verified Unverified
8	Response to IBFAN reports	The company publish a response to IBFAN's 'Breaking the Rules, Stretching the Rules' reports on alleged violations, published every two years: Yes No
9	Complaints	The company discloses each complaint or criticism made by stakeholders and explains how it has responded to them either directly. The company makes a general statement about complaints or criticism received and how it has responded to them. The company does not disclose any complaints or criticism or its response.
10	Position papers	The company publishes position papers on BMS issues: Yes No
11	Memberships	The company publishes a list of trade associations and industry groups it is a member of, relating to BMS / Infant and Young Child Nutrition: Yes No

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12	Full list	The company certifies that the list it publishes is a full list of all such groups globally:
		Yes
13	Lobbying activities	No
		The company publishes a description of its lobbying activities:
		Yes, extensive.
		Yes, limited.
No.		

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