

ANTI-BRIBERY POLICY

ACCESS TO NUTRITION FOUNDATION

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ACCESS TO
NUTRITION
INDEX™

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1. About the Access to Nutrition Foundation

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

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

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

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

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

1.1 Access to Nutrition Foundation Mission

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

2. Purpose of the Anti-Bribery Policy

The purpose of this policy is to outline the behavior and principles to support the ATNF's anti-bribery commitment. This policy will enable Staff members to recognize when bribery issues arise, avoid prohibited conduct where the issues are clear, and promptly seek guidance where they are not.

The general rule is that all ATNF Staff members, and all those acting for or on the ATNF's behalf, are strictly prohibited from offering, paying, soliciting or accepting bribes or kick-backs, including facilitation payments. Third parties, contractors, agents, representatives and intermediaries who act on behalf of the ATNF must comply with these anti-bribery provisions or a comparable Code of Conduct.

This Anti-Bribery Policy applies to all ATNF Staff members, including the Executive Director.

3. Prohibition Against All Forms of Bribery

3.1. Bribery

In general, bribery means directly or indirectly offering, giving or receiving anything of value to influence the behavior of someone to act or not act, to do something illegal, or to secure an improper advantage, regardless of intent.

A bribe can take many forms, can be transmitted through third parties, and can be of any size. Examples include:

- Attempts to secure improper advantage in any area, for example in securing government authorizations, speeding up permits and applications, or other favorable treatment;
- Offers of any form of undue reward, not just money, including extravagant trips or entertainment or gifts of significant value;
- All means of channeling undue payments or other benefits, or for masking their purpose, whether as bribes, subcontracts, purchase orders, consultancy agreements, or through agents or other third parties;
- Staff members receiving something of value (either directly or indirectly) in return for giving an improper advantage to a third party; and
- Staff members receiving from a third party, either directly or indirectly, anything of more than a minimal value in connection with a transaction entered into by the ATNF.

3.2 Facilitation payments

Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government actions such as the provision of a visa, customs clearance, permit, license, work order, police protection, utility services, mail service, contract performance and actions of a similar nature. In some countries, it is widespread and may be considered normal practice to make such payments, but they are often nonetheless illegal under the OECD Convention, the Foreign Corrupt Practices Act and the UK Bribery Act 2010. Regardless of any pressure exerted by foreign officials requesting facilitation payments, the ATNF will conduct business using only legal and ethical means.

4. Safeguards

ATNF Staff members are responsible for ensuring that ATNF's anti-bribery expectations are communicated to and followed by such persons/entities, and that appropriate contractual protections and safeguards are in place where necessary.

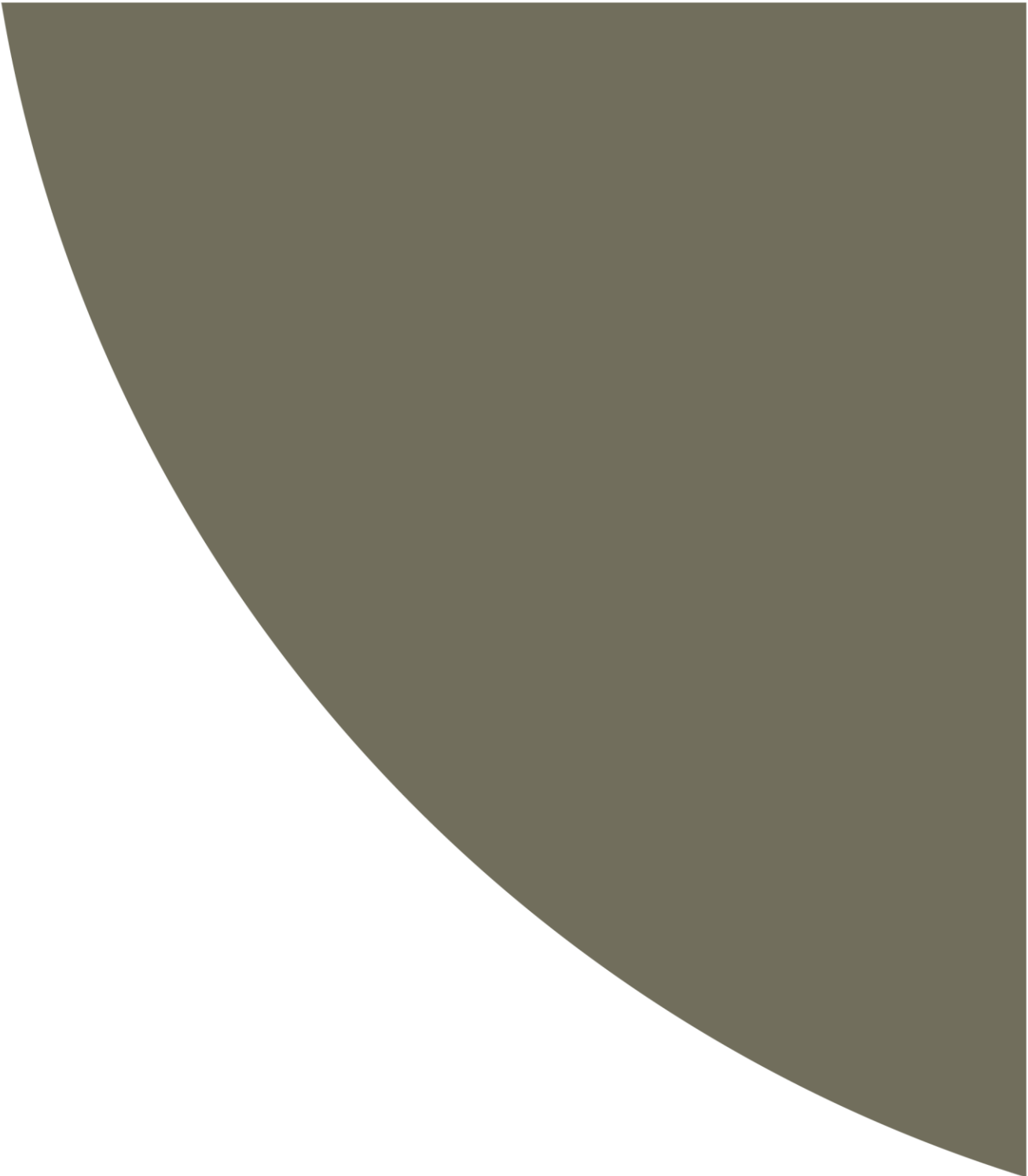
5. Compliance with the policy

It is the responsibility of the Executive Director to ensure compliance with this policy. However, each of ATNF Staff members has an obligation to act with integrity and to ensure that we understand and comply with this Policy. In addition, all Staff members will be required to confirm that they have understood and complied with the policy annually.

6. Whistleblowing

ATNF is committed to ensuring that Staff members can speak up with confidence if they have any concerns or need to ask for help. For this reason, the ATNF developed a Whistleblower Policy. The purpose of this policy is to encourage Staff, board, consultants and other stakeholders to raise any serious concerns they may have about the way in which the Access to Nutrition ATNF is run or about the conduct of those involved running it. The ATNF wishes to find out if malpractice or unlawful activity exists within the ATNF so that it can be dealt with appropriately.

For further information see ATNF's Whistleblower Policy.



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