

CONFLICT OF INTEREST 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 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 Conflict of Interest Policy

The purpose of this Policy is to provide guidance in identifying and handling potential and actual conflicts of interest involving the ATNF. In most instances, conflicts of interest can be avoided simply by continuing to exercise good judgment and, indeed, the foundation relies on the sound judgment of its Staff members to prevent any such conflict situations.

The ATNF is committed to the highest levels of integrity. Staff members and Board members of the ATNF are expected to conduct their relationships with each other, the ATNF, and outside organizations with objectivity and honesty. The general rule is that: ATNF Staff members are obligated to avoid and disclose ethical, legal, financial, or other conflicts of interest involving the ATNF, and remove themselves from a position of decision-making authority with respect to any conflict situation involving the ATNF.

The Conflict of Interest Policy applies to all Access to Nutrition Foundation Staff members, Board

members and Expert Group members.

3. Risks associated with conflicts of interest

- Transparent management and criteria of the ATNI, as well as full transparency about and management of (potential) conflicts of interest, are crucial to the credibility of the ATNI and that of the ATNF;
- A material conflict of interest is an interest which, in view of all the circumstances, could reasonably be expected to affect the independence or impartiality of the person or party with the interest;
- Material conflicts of interests of individuals related to the ATNI or the ATNF could lead to:
1. biases in measurements, monitoring or reviews; 2. biases in the publication of measurements, monitoring or reviews; 3. misuse of privileged and confidential knowledge; 4. damage to the credibility and may compromise the integrity of the ATNI and the ATNF.
- Any person exercising direct influence on ATNI methodology, ATNI measurement or ATNI publication, including Board members, Staff, Expert Group members and contractors, shall have no material conflict between their respective personal, professional or business interests and the integrity of the ATNI or the ATNF, in any and all actions taken by them on behalf of or for the ATNF in their respective capacities.
- For the quality and effectiveness of the ATNI it is essential that in developing the methodology, business experts are involved with inside knowledge of the industry. For reasons of impartiality, experts in an active responsibility within one of the measured companies are excluded. Others, for example retired officials or experts in a limited advisory role to companies, can be involved but only in roles with an indirect influence on the methodology, for instance in an advisory role to Board and Staff or membership of a multi-stakeholder committee. The Board evaluates the involvement of each business expert, their role and potential conflict of interest. Their role and link to the industry are published on the website of the ATNI.

4. Potential conflicts of interest

Potential conflict of interest include:

- Having a direct sizeable business interest in a company that is measured by the ATNI;
- Having direct possession, purchase or sale of equity securities in a company that is measured by the ATNI;
- Providing ATNF's privileged or confidential information or advice to third parties which can be used to decide on such purchase or sale;
- Receiving financial compensation or other favors from a company that is measured by the ATNI to influence its performance on the ATNI, or from a company that has itself a conflict of interest; financial compensation includes direct and indirect remuneration as well as gifts or favors worth EUR 50 or more (or the equivalent in another currency);
- Having a close family member (e.g. spouse, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister) with such interests;
- Other interests that have been deemed potentially conflicting by the Board.

5. Management of potential conflicts of interest

- Staff and Board members may be able to shield themselves from the appearance of conflict of interest by documenting the decision-making process and approval process;
- Disclosure: Any person exercising influence on ATNI methodology, ATNI measurement or ATNI publication, whether as a Board member or Staff member, and who has a potential interest as defined under item (4), shall disclose such interest, or a change in such interest, to the Board through the agreed Potential Conflict of Interest Declaration Form (attached to this Policy) forthwith after the potential conflict arises;
- The Board shall evaluate all disclosed potential conflicts of interest and assess whether they are 'material conflicts of interest';
- Certification: Any individual within the ATNF who has the means to directly influence ATNI measurements or scores shall certify that he or she does not have potential conflicts of interest as defined under item (4);
- Confidentiality: ATNI outcomes are confidential until their formal time of release. Any individual within the ATNF who has advance knowledge of Index outcomes shall not disclose any part of such outcomes to third parties before the formal time of release;
- Any outside contractor shall certify the independence, impartiality and reliability of its work; the existence of internal controls; compliance with legal requirements for having adopted a code of ethics or conflict of interest policy; and honor the confidentiality of ATNI outcomes;
- The Board shall review this Policy at least once per year and apply all changes necessary to maintain the impartiality and credibility of the ATNI and the ATNF.

6. Corrective actions

- Any material conflict of interest or any violation of the rules set forth in this Policy shall prompt disciplinary and/or corrective action by the Board;
- A charge of incompletely or inaccurately disclosed conflicts of interest shall be directed to the Chair of the Board;
- The Board shall take no action until it has given the person charged with the alleged conflict of interest the opportunity to fully represent him/herself;
- The Board may appoint a disinterested person or committee to investigate the alleged conflict of interest;
- The person with the alleged conflict of interest shall not take part in any vote on the nature of the interest or any related decision.

POTENTIAL CONFLICT OF INTEREST DECLARATION FORM

To be completed and signed by Board and Staff members.

I have reviewed and understood the Conflict of Interest Policy of the Access to Nutrition Foundation and agree to abide by it; (This box must be checked by all.)

I have no potential conflict of interest as defined in the Conflict of Interest Policy of the Access to Nutrition Foundation; (This box must be checked by any person within the Access to Nutrition Foundation who has the means to directly influence Access to Nutrition Global Index methodology or scores.)

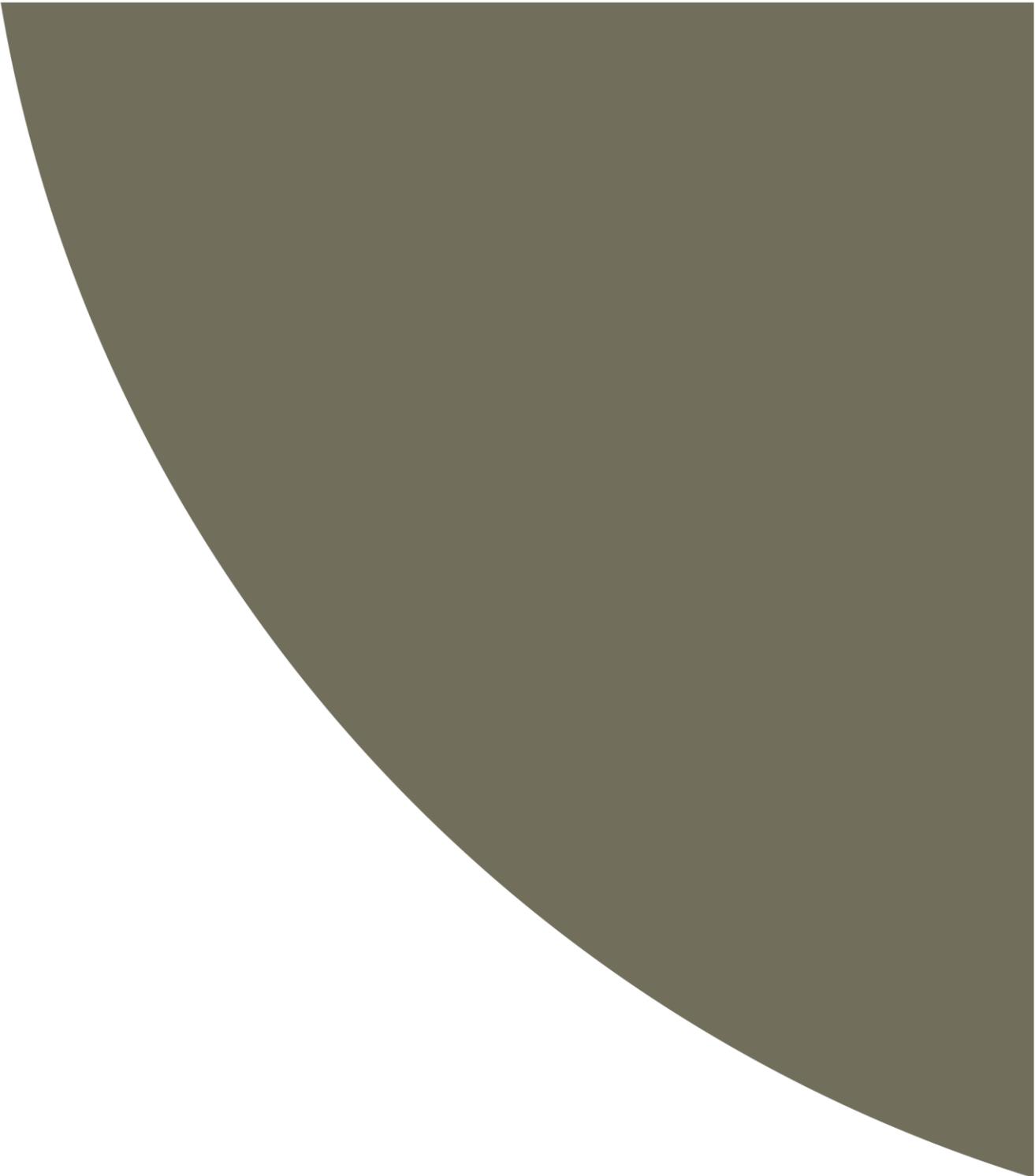
I report the following potentially conflicting interest(s), as defined in the Conflict of Interest Policy of the Access to Nutrition Foundation (please describe fully, including name and nature of the interest);

1. _____
2. _____
3. _____

List continues on ____ annex page(s).

I hereby certify that the information provided is true and complete to the best of my knowledge; that I will adhere to decisions on conflicts of interest by the Board; and that I will report future changes to this information to the Board's Chairman within one month after they arise.

Name: _____
Position: _____
Signature: _____
City, Date: _____



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