

CODE OF CONDUCT & ETHICS POLICY

ACCESS TO NUTRITION FOUNDATION

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ACCESS TO
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INITIATIVE

CODE OF CONDUCT & ETHICS POLICY
ACCESS TO NUTRITION FOUNDATION

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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 to responsibly exercise their influence on consumers' choice and behaviour.

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 behaviour through responsible marketing, labelling, 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 behaviour.

1.2 Key Guiding Principles

The ATNF approaches its tasks and works with others based on the following guiding principles:

- **Not-for-profit:** ATNF acts for the public good and all funds are employed in the pursuit of its mission.
- **Independence:** independence of governance, funding and perspective are essential to the integrity and credibility of the ATNF and enables the realization of impartiality towards all stakeholders.
- **Transparency:** transparency of management, activities, methodology and findings supports public trust and accountability.
- **Respect:** respect for the mission of the ATNF aligns with respect for the process of fairly representing the collective view of society's expectations of F&B companies and respect for the views of all stakeholders.
- **Collaboration:** the ATNF collaborates with other organizations to avoid overlap and duplication of effort, where there are shared values, common aims, and activities are for

- the good of society.
- **Affirmation:** through the ATNI, the ATNF acknowledges the positive progress and efforts of companies towards access to F&B practices.
 - **Inclusivity:** the ATNF works from an inclusive perspective towards all belief, culture, gender, race, ethnicity, and national and regional considerations.
 - **Human rights:** the ATNF respects universal human rights.

1.3 Key Operating Principles

ATNF key operating principles include:

- **Decision making:** is transparent, evidence-based and strategic, for the good of the entire organization. Everyone understands how and why decisions are made.
- **Staff:** ATNF strives to have the right number of Staff in the right positions at the right time; and every position has clear accountability, responsibility and authority. Technical and managerial expertise/functions do not have to reside in the same person.
- **Quality Standards:** ATNF is committed to establishing and meeting realistic high-quality standards for its projects, and to developing and implementing the monitoring and evaluation systems necessary to monitor and ensure these standards.
- **Respect for the law:** The ATNF is knowledgeable of and complies with all laws, regulations and applicable international conventions. Staff members must comply and abide by all applicable laws and regulations.

2 Purpose of the Code of Conduct & Ethics Policy

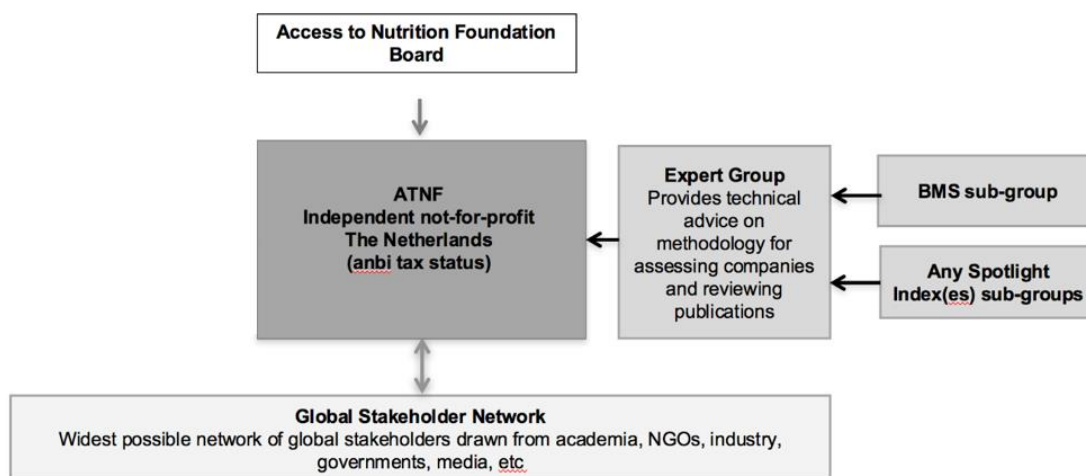
This document serves to set out the fundamental principles and standards that the ATNF strives to maintain, and as a guide to the actions and decisions of all those working with and for the ATNF.

The Code of Conduct & Ethics Policy applies to all ATNI's Staff, board members, consultants and other stakeholders who have a contractual relationship with ATNF.

Key principles of the Code of Conduct & Ethics Policy will be incorporated in Terms of Reference of the Expert Group members and in contracts with service providers.

3 Governance

ATNF Governance and advisory structure



3.1 Board of Directors

ATNF is governed by a Board of Directors according to Dutch law. The Board comprises of a number of members with a wide variety of backgrounds and skills. None is currently employed by or advising a food and beverage manufacturer. This ensures that ATNF benefits from the essential experience of those who have worked in the industry but can maintain its independence from industry.

The ATNF's Board is responsible for all its acts and policies. Among other things, the Board:

- Ensures that the ATNF has the capacity to carry out its work effectively;
- Ensures that the resources of the Foundation are responsibly and prudently managed;
- Ensures that the ATNF conducts all its transactions and dealings with integrity and honesty;
- Ensures that the ATNF carries out its mission in a transparent and professional way;
- Earns trust and respect from the outside world for the way it independently, impartially and reliably constructs, measures, monitors and publishes the ATNI;
- Ensures that the ATNF incorporates into its policies, as appropriate, current knowledge and thinking from all stakeholders, including NGOs, governmental bodies, consultants, academics, investors and the corporate sector;
- Carefully evaluates all such inputs in order to reach balanced conclusions;
- Ensures that the ATNF withstands undue outside pressures to adjust the ATNI's methodology, measurements or publication;
- Maintains a Conflict of Interest Policy that ensures that any conflicts of interest or the appearance thereof are avoided or appropriately managed through disclosure, recusal or other means;
- Ensures that its members have the requisite skills and experience to carry out their duties and that all members understand and fulfil their governance duties acting for the benefit of the ATNF and its purpose;
- Is responsible for a regular review of the performance of the Executive Director and ensures that the compensation of the Executive Director is reasonable and appropriate;
- Ensures that the Executive Director and appropriate Staff members provide the Board with

- timely and comprehensive information so that the Board can effectively carry out its duties;
- Ensures that the ATNF promotes working relationships with Board members, Expert Group members and Staff, that are based on mutual respect, fairness and openness;
- Ensures that the ATNF is fair and inclusive in its hiring and promotion policies and practices for all Board, Expert Group and Staff positions;
- Ensures that policies of the ATNF are in writing, clearly articulated and officially adopted.

3.2 Expert Group

ATNF's Board and Staff are guided on ATNI's methodology development by an Expert Group comprised of international nutrition experts.

The mandate of the ATNI Expert Group is to:

- Provide input on the company assessment methodology, including the broad categories of criteria, individual criteria, indicators, the scoring and weighting system, and presentation of the final results;
- Review and provide advice on input received from a broad stakeholder network on elements of the draft methodology;
- Advise on the final framework and methodology for assessing companies within the ATNI;
- Broadly act as an advisor and sounding Board for the ATNF Staff on the ATNI methodology;
- Proactively alert ATNF Staff to opportunities and risks around the proposed methodology, and suggest means of exploiting the opportunities and mitigating the risks;
- Provide advice on other issues that may emerge during the methodology revision, asked and unasked;
- Review the ATNI report and/or other publications of the ATNF.

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

4 Human Rights

The ATNF, within the framework of internationally recognized human rights, the international human rights obligations of the countries in which the ATNF operates as well as relevant domestic laws and regulations:

- Respects human rights, avoids infringing of the human rights of others and addresses adverse human rights impacts with which the ATNF is involved;
- Carries out human rights due diligence as appropriate to the size of ATNF, the nature and context of operations and the severity of the risks of adverse human rights impacts;
- Provides for or co-operates through legitimate processes in the remediation of adverse human rights impacts where identified that the ATNF has caused or contributed to these impacts.

5 Personal and Professional Integrity

5.1 Transparency

In addition to the human rights principles, ATNF strives to provide a pleasant work environment that is harmonious and treats employees fairly, with dignity and respect. ATNF believes that ideas flourish in an atmosphere of free and open communication where employees can discuss their ideas or problems with their supervisors or other officers of ATNF without fear of reprisal.

ATNF encourages employees with a work concern to discuss them with their supervisor/manager first and if needed the Executive Director. Managers have a special duty to report concerns as well as to take prompt and appropriate action in response to the issues brought to their attention by their colleagues. Even if the problem seems insignificant, ATNF wants employees to speak up in hopes of finding a solution before the problem becomes serious or irreconcilable.

ATNF has a whistle-blower policy and has appointed a compliance officer. This policy applies to all employees, Board members, and other stakeholders who have a contractual relationship with ATNF.

5.2 Gifts and Entertainment

ATNF's employees and any members of his/her immediate or extended family may not accept, offer or give gifts, entertainment, services, loans, promises of future employment or other benefits (referred to as "gifts") having more than nominal value (i.e., greater than €50 in fair market value in the US or Europe, or the comparable value within the specific economic context of each international location where ATNF is present) from or to existing or potential funders, partners, suppliers, employees or others. If a gift exceeds €50 and cultural sensitivities are such that non-acceptance is not a viable option, the staff person accepting the gift should either share it with the rest of the office and/or donate it to a charity. Regardless of the monetary value, ATNF's employees must not give or accept gifts that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate laws, regulations or policies of ATNF or its donors, or would cause embarrassment to or reflect negatively on ATNF's reputation.

Any gifts and entertainment paid for by the Food & Beverage ('F&B') companies and F&B industry associations are strictly prohibited. In case of doubt, employees should consult the Executive Director.

ATNF also has additional rules laid down in its Anti-Bribery policy. This policy – like any other ATNF policy - is also applicable to all ATNF's employees.

5.3 Alcohol and Substance Abuse

ATNF is an alcohol and drug-free workplace and our employees have a duty to perform their jobs in a safe and conscientious manner. It is ATNF's strict policy that all employees, Board members, consultants, and other stakeholders who have a contractual relationship with ATNF are free from the effects of drugs, alcohol or other substances (which can impair performance and reflect negatively on ATNF) whenever at work. Violation of this obligation may, at the discretion of the management of ATNF, be punished with a dismissal or immediate dismissal.

5.4 Harassment, Discrimination and Violence in the Workplace

ATNF endeavors to respect the culture, structures and customs of the communities and countries where it works. ATNF is committed to maintaining congenial work environments in which all individuals are treated with respect and dignity. ATNF employees, Board members, consultants and other stakeholders who have a contractual relationship with ATNF are expected to maintain a productive work environment, free from unreasonable interference, intimidation, harassment or disruption of routine business. Every member of the ATNF community has the right to work in a professional atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment.

Harassment or discrimination can be based on many personal characteristics including: race, color, religion, creed, national origin, citizenship status, age, sexual orientation, marital status, sex, HIV status or physical or mental disability. ATNF employees, Board members, consultants and other stakeholders who have a contractual relationship with ATNF are responsible for preventing all forms of harassment. Supervisors must ensure that all employees reporting to them are free from all forms of harassment from peers and those in more senior positions. Harassment of any kind is contrary to ATNF policy and will not be tolerated and ATNF will take disciplinary measures if employees, Board members, consultants and other stakeholders who have a contractual relationship with ATNF act in violation of this obligation. In the interest of the entire staff, ATNF's employees, Board members, consultants and other stakeholders who have a contractual relationship with ATNF must demonstrate positive behavior that benefits ATNF and serves the needs of staff members and others who have a contractual relationship with ATNF. Any conduct that discredits ATNF or is offensive to colleagues, donors, suppliers or visitors, will not be tolerated.

6 Reporting Violations

The Code addresses ATNF's open door policy and suggests that all personnel and other stakeholders who have a contractual relationship with ATNF share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. Supervisors are required to report any violation or suspected violation of law, the Code or any other adopted policy of ATNF to the Executive Director. If the issue is not resolved properly the supervisor will report to ATNF's Board-appointed Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. In the case of any violation or suspected violation of law, the Code or any other adopted policy of ATNF, or if someone is not satisfied or uncomfortable with following ATNF's open door policy, ATNF's Compliance Officer should be contacted directly.

There are two ways to contact the ATNF Compliance Officer, Mr. Paulus M. Verschuren:

a) via email at paulusmverschuren@gmail.com or b) should you prefer your suspicion or grievance to remain anonymous, through an unsigned letter, C/o Compliance Officer, ATNF, Arthur van Schendelstraat 650, 3511 MJ Utrecht.

7 Compliance Officer

The Board appoints a Compliance Officer within the Board for a two-year term, by voting. The Compliance Officer is responsible for administering the Whistleblower Policy and investigating and resolving all reported complaints. This includes clauses around safeguarding and allegations concerning any violation or suspected violation of law, the Code or any other ATNF policy and, at

his or her discretion, shall advise the Chairman or the Executive Director.

8 Conflicts of Interest

ATNF developed a Conflict of Interest Policy for all its Staff, the Board and Expert Group. This policy protects ATNF's interests when it is contemplating entering into a transaction or arrangement that might benefit the private interest of Staff or Board member of the ATNF. The ATNF Conflict of Interest Policy is intended to supplement but not replace any applicable laws, rules or regulations governing conflicts of interest applicable to non-profit and charitable corporations.

ATNF's Staff, Board and Expert Group members are expected to act in the best interest of the ATNF and take care to avoid the potential or appearance of conflict of interest. A conflict of interest is defined as any circumstance that impedes Staff, Board and Expert Group member's ability to act with total objectivity with regard to ATNF's interests. Staff members should maintain fairness, ethics and personal integrity in all matters and must refrain from participating or giving the appearance of participating, in any activity that compromises their ability to render fair, impartial judgments on behalf of ATNF.

Further details are available in ATNF's Conflict of Interest Policy.

9 Corruption and Bribery

The general rule is that all ATNF staff members, Board members and all those acting for or on 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 ATNF's Anti-Bribery Policy. This is incorporated in their contracts. Further information is provided in the ATNF Anti-Bribery Policy.

10 Confidentiality

The performance of ATNF's work involves information that is proprietary and confidential. Every staff, Board member, consultant and other stakeholders who have a contractual relationship with ATNF has the duty to maintain the confidentiality of proprietary business information they receive during their professional activities if such disclosure is likely to harm the employer, Board members or another staff member. All ATNF Staff Board member, consultant and other stakeholders who have a contractual relationship with ATNF will exercise complete discretion in regard to all matters of official business. They may not communicate any information known to them by reason of their position that has not been made public, except as may be necessary in the course of their duties or by authorization of the Executive Director.

Confidential information includes, but is not limited to, any document marked "confidential": mail in a sealed envelope and/or marked "confidential": any document related to project design and development, including budgets, log-frames and strategies; and any document concerning the treatment of staff members, including employment contracts, administrative letters, contract amendments, salary statements, payroll documents and disciplinary actions. Information marked by the food and beverage companies as under a Non-Disclosure Agreement or "confidential" have

to be considered as confidential.

11 Compliance with the Code of Conduct & Ethics Policy

11.1 Responsibilities

All staff, Board members, consultants and other stakeholders who have a contractual relationship with ATNF must be aware of and understand the provisions of this Code as well as other applicable ATNF policies, including those specifically identified in this Code. Failure to comply with the Code and those policies may result in disciplinary action up to and including termination of employment and may also impact your performance rating.

11.2 Annual Attestation of Staff members

All Staff and Board members are required as a condition of employment to complete the attestation provided by the employer on an annual basis.

12 Distribution of the Code of Conduct and Ethics Policy

A copy of this Policy will be distributed to all Board members, consultants, employees and other stakeholders who have a contractual relationship with ATNF. The Policy will be shared with all ATNF's suppliers. All suppliers are required to adhere to same standards for handling safeguarding issues. The Code of Conduct and Ethics Policy will be published on ATNF's website.

CODE OF CONDUCT & ETHICS POLICY ATTESTATION FORM

To be completed and signed by Staff members, Board, consultants and other stakeholders who have a contractual relationship with ATNF.

[] I have reviewed and understood the Code of Conduct & Ethics Policy of the Access to Nutrition Foundation and agree to abide by it; (This box must be checked by all.)

Name: _____

Position: _____

Signature: _____

City, Date: _____

Access to Nutrition Foundation

Arthur van Schendelstraat 650

3511 MJ Utrecht

The Netherlands

+31 (0)6 4346 8299

info@acesstonutrition.org

www.acesstonutrition.org

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