

ATNI GLOBAL INDEX 2016

METHODOLOGY

January 2016



ACCESS TO
NUTRITION
INDEX™

ATNI GLOBAL INDEX 2016

METHODOLOGY

Introduction

This document presents the methodology for the Global Access to Nutrition Index 2016¹. After the publication of the first edition of the Global Index, ATNF consulted extensively with stakeholders on how it could be improved. Over 100 organisations were involved through round-tables, one-on-one consultations and webinars. In addition, various organisations contributed via the on-line survey that was conducted by ATNF in August and September 2014. The ATNF Expert Group provided advice on all aspects of the methodology (see Appendix I for the list of members of the Expert Group).

Methodology structure

The ATNI 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 (20 in total).
- **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 majority of the Indicators assess companies' practices related to promoting good nutrition for all, and preventing and tackling obesity and diet-related chronic disease, while others assess additional actions companies are taking to prevent and address undernutrition – which will account for approximately 25% of the overall Index score².

The methodology is based, to the extent possible, on existing international standards, guidelines and frameworks, such as those developed by the WHO, Codex and other leading nutrition-focused organisations.

¹ This methodology document covers the general Global Index methodology excluding a separate methodology to assess marketing of Breast Milk Substitutes. This methodology will be published separately.

² We are not applying the undernutrition indicators to companies that derive less than 5% of their F&B revenues from non-OECD markets.

Table 1 Global Index 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 (25%) | Formulating appropriate products | B1 Product formulation* |
| | | B2 Nutrient profiling system |
| C (20%) | Delivering affordable, accessible products | C1 Product pricing* |
| | | C2 Product distribution* |
| Section 3: Influencing consumer choice and behavior | | |
| D (20%) | Responsible marketing policies, compliance and spending | D1 Responsible marketing policy: all consumers |
| | | D2 Auditing and compliance with policy: all consumers |
| | | (D3 Spending: Advertising focus: all consumers*) |
| | | D4 Responsible marketing policy: children |
| | | D5 Auditing and compliance with policy: children |
| | | (D6 Spending: Advertising focus (children) and policy impact) |
| E (2.5%) | 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 (15%) | Product labeling and use of health and nutrition claims | F1 Product labeling |
| | | F2 Health and nutrition claims |
| G (5%) | Influencing governments and policymakers, and stakeholder engagement | G1 Lobbying and influencing governments and policymakers* |
| | | G2 Stakeholder engagement* |

* Criteria with additional undernutrition specific indicators

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 to improving nutrition and 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.

Category B Formulating appropriate products

Companies 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 25% of the weight of the overall score.

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

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

This Category carries 20% of the weight of the overall score.

Category D Responsible marketing policies, compliance and spending

This Category captures the extent to which companies support consumers 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 focus)³

CHILDREN

D4 Responsible marketing policy
D5 Auditing and compliance with policy
(D6 Marketing focus)

This Category carries 20% of the weight of the overall score.

Category E Supporting healthy diets and active lifestyles

Companies can support healthy diets and active lifestyles for their own staff 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 a healthy start to life. Companies can also help consumers to adopt healthy diets and active lifestyles through support for education programs.

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 consumer-oriented healthy diet and active lifestyle programs

This Category carries 2.5% of the weight of the overall score.

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 and potential health benefits 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 disease, as well as raise awareness of products that will address micronutrient deficiencies.

³ After the data collection phase of the research it was decided to make Criteria D3 and D6 unscored because indicators do not resonate with current practice and the companies do not keep this kind of information.

This Category assesses companies' approaches to product labeling and use of health and nutrition claims, particularly with respect to the consistency of their application across product portfolios and in different markets and their accordance with international standards. This assessment is divided into two Criteria:

F1 Product labelling

F2 Health and nutrition claims

This Category carries 15% of the weight of the overall score.

Category G Influencing governments and policymakers, and stakeholder engagement

Companies can have an impact on consumers' access to nutrition by influencing governments 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 (including international organizations, 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.

ATNI Global Index Methodology 2016⁴



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 more than 75% on B2).



Geographic multiplier

In order to reward companies that make commitments or deliver commitments on a global basis, rather than on a more limited geographic basis, a company's score on the scope of its policy or performance is in some cases multiplied (e.g. by 2 if it applies globally, by 1.5 if that policy or performance applies to multiple major markets, and by 1 if it applies to a company's home market only).

More general terms and definitions can be found in **Appendix II General definitions List**. Additionally, in **Appendix III Explanations of specific indicators** are provided.

Section 1 - Nutrition governance and management

| Category A Corporate strategy, management and governance | | |
|--|---|---|
| A1 Corporate nutrition strategy | | |
| 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? | 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 low-income populations? | Yes, and with explicit reference to low-income populations Yes, but with no explicit reference to low-income 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 global challenges of increasing levels of obesity and diet-related chronic diseases? | Yes No or no information |
| 3.2 | | Yes |

| | | |
|---------------|--|---|
| | Does the company recognise the priorities set out in the WHO Global Action Plan? | No or no information |
| | Performance | |
| 4 | Does the company conduct a nutrition-related business risk assessment at least every 2 years? | Extensive Limited No or no information |
| 5 | Does the company mention the following types of risks: (Tick all that apply) (For information only, i.e. not scored) | Future nutrition-related taxes Impact of future potential nutrition-related litigation Impact of future potential regulation of marketing Impact of future potential regulation of labeling and health and nutrition claims Likelihood of loss of market share due to consumer concerns related to nutrition Likelihood of significant loss of revenues due to consumers' changing buying habits Impact on reputation of poor performance on nutrition Impact on brand value of poor performance on nutrition None of these |
| 6 | 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 |
| 7 | Sales of healthy products: | |
| 7.1 | What was the value of the company's total global sales of 'healthy' ⁵ products (as defined by the company) in FY 2014? (US\$ mn) (For information only, i.e. not scored) | |
| 7.2 | What percentage of the total SKUs sold in FY 2014 met the company's definition of 'healthy'? (For information only, i.e. not scored) | |
| 7.3 | How does the company define 'healthy', i.e. is it by applying the company's Nutrient Profiling System, or any other way? If another way, please explain. (For information only, i.e. not scored) | |
| 8 ♡ | What percentage of the company's total global value of sales in FY2014 did 'healthy' products account for? | |
| 9 ♡ | By how much have the company's sales of healthy products increased between FY 2012 – 2014 (US\$ mn)? (For information only, i.e. not scored) | |
| | Disclosure | |
| 10 | Does the company disclose: (Tick all that apply) | A clear statement that its growth strategy is based on an increasing focus on nutrition Nutrition risk assessment Acquisitions, disposal, JV and partnerships commentary related to nutrition |

| | | |
|---|---|--|
| | | Quantitative information about how much the company's healthy offering has increased between FY 2012-2014 and/or % total sales accounted for by healthy products |
| No. | Undernutrition | |
| | Commitments | |
| 11 | Does the company commit to playing a role in combating undernutrition in low-income countries? | Yes No or no information |
| | Performance | |
| 12 | Has the company undertaken a strategic review of the commercial opportunities available to it in addressing undernutrition/developing products for the undernourished and at what level of the company was this reviewed? | Yes, reviewed by the Board Yes, but not reviewed at Board level No strategic review/ no evidence |
| 13 | What was the company's total global value of sales of products specifically formulated for the undernourished in FY 2014 (US\$ mn)? (For information only, i.e. not scored) | |
| | How does the company explain the definition it uses for 'products specially formulated for the undernourished'. (For information only, i.e. not scored) | |
| 14 | By how much have the company's sales of products specifically formulated for the undernourished increased between 2012 - 2014 (US\$ mn)? (For information only, i.e. not scored) | |
| 15 | What percentage of company's total global value of sales in FY 2014 did products specifically formulated for the undernourished account for? (For information only, i.e. not scored) | |
| | Disclosure | |
| 16 | Does the company disclose: (Tick all that apply) | A clear commitment to tackling undernutrition A statement about having undertaken a strategic review Conclusions of the strategic review Quantitative information about total sales of products formulated for the undernourished in FY 2014 (and/or by how much they have increased since a previous year) |
| A2 Nutrition governance and management systems | | |
| No. | Nutrition | |
| | Commitments | |
| 1  | Does the company have a Board- approved 'nutrition strategy' or 'nutrition policy'? | Comprehensive Limited Under development None of these |
| 2  | Does the company have objectives relating to delivering better nutrition? | 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 |
| | Performance | |
| 3  | Who has formal accountability for implementing the company's nutrition strategy and/or programs? | CEO or an Executive that reports directly to the Board A committee that reports to the Board, e.g. Sustainability Committee No Information |

| | | |
|--|---|--|
| 4  | Does the company seek specialist external experts' advice on preventing and addressing obesity and diet-related chronic disease? | Formal panel of experts with a broad range of expertise (i.e. nutrition and health, responsible marketing, labelling, promoting active lifestyles, etc.) |
| | | Formal panel of experts with narrow range of expertise (e.g. medical or nutrition only; no marketing/sports and activity/nutrition education etc. specialists) |
| | | Informal/ad-hoc input sought |
| | | No external input sought/no information |
| 5  | To whom does the company allocate the day-to-day responsibility for implementing its nutrition strategy/plan? What is his/her function and level in the company? | An Executive Manager (one level below the board) |
| | | A Manager two or more levels below the board |
| | | No responsibility or no Information |
| 6  | Is the company's nutrition plan/strategy delivery subject to standard internal audit and annual management review? | Yes, standard internal audit and annual management review |
| | | Either standard internal audit or annual management review but not both |
| | | To none of them or no information |
| 7  | Does the company link the remuneration of the CEO and/or senior managers with performance on nutrition targets/objectives? | CEO's compensation is specifically linked to performance on nutrition objectives |
| | | CEO's compensation is linked to performance on CSR initiatives (nutrition clearly part of those initiatives) |
| | | Only links senior managers' remuneration to performance on nutrition objectives |
| | | No link or no information |
| Disclosure | | |
| 8  | Does the company publish: (Tick all that apply) | Its nutrition strategy/policy |
| | | 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 |
| | | Names and affiliations of members of its advisory panel/names of advisors |
| | | Terms of reference for its advisory panel |
| | | Board level arrangements |
| | | Managerial arrangements |
| | | Compensation arrangements for CEO |
| No. | Undernutrition | |
| | Commitments | |
| 9 | Has the company formally set out how it intends to address undernutrition through its commercial strategy? | Yes |
| | | No or no information |
| 10 | Has the company (or its Foundation/CSR program) formally set out how it intends to address undernutrition through its philanthropic giving/non-commercially? | Yes |
| | | No or no information |
| 11 | Does the company pledge to work within regional and national frameworks in support of goals set by the international/national nutrition community to address specific fortification needs and undernutrition issues more broadly? | Yes |
| | | No or no information |
| 12 | On which target groups does the company commit to focus its commercial undernutrition activities in developing countries? | Children under the age of 2 and/or women of childbearing age |
| | | Both the above groups and other children |
| | | Other populations/No target groups articulated |
| | | No target groups articulated |
| 13 | On which countries does the company commit to focus its commercial undernutrition activities? | Higher priority countries exclusively (as defined by ATNI – see Appendix II) |

| | | |
|-----------|---|---|
| | | Both higher and lower priority countries (as defined by ATNI – see Appendix II) |
| | | No focus outlined/no information available |
| 14 | On which target groups does the company commit to focus its philanthropic undernutrition programs in developing countries? | Children under the age of 2 and/or women of childbearing age |
| | | Other children |
| | | Other populations |
| | | No target groups articulated |
| 15 | On which countries does the company commit to focus its philanthropic undernutrition programs? | Higher priority developing countries exclusively (as defined by ATNI) |
| | | Both higher and lower priority developing countries (as defined by ATNI) |
| | | No focus outlined/no information available |
| | Performance | |
| 16 | Has the company done market research or wider studies to assess the need/potential for addressing undernutrition through micronutrient fortification? | In more than 5 developing countries |
| | | In 1-4 developing countries |
| | | No or no information |
| 17 | Is the company's commercial approach to addressing micronutrient deficiencies through product fortification in developing countries: | Strategic and well-structured with a commercial strategy being implemented in many developing countries |
| | | Ad hoc with programs in only a few developing countries |
| | | None articulated |
| 18 | Is the company's non-commercial approach to addressing micronutrient deficiencies through product fortification in developing countries: | Strategic and well-structured with activities in many developing countries |
| | | Ad hoc with activities in only a few developing countries |
| | | None articulated |
| 19 | To whom (what function) has the company assigned top-level oversight for its commercial strategy/program to address undernutrition | CEO or other senior Executive |
| | | Committee that reports to the Board or Executive Manager |
| | | Senior manager one level below Executive |
| | | Another less senior staff member |
| | | No information |
| 20 | Does the company seek any specialist external experts' advice on preventing and address undernutrition? If yes, what is their status? | Formal panel of experts with a broad range of expertise |
| | | Formal panel of experts with narrow range of expertise (e.g. medical or nutrition only; no marketing, community engagement, wider knowledge of undernutrition causes and solutions) |
| | | Informal/ad-hoc input sought |
| | | No external input sought/no information |
| 21 | Company spending on undernutrition (For information only, i.e. not scored): | |
| 21.1 | How much did the company spend through its philanthropic programs in FY 2014 on tackling undernutrition (US\$ mn)? | |
| 21.2 | What percentage of its philanthropic giving/non-commercial budget did the company spend on programs to address undernutrition in FY 2014? | |
| 22 | Does the company have partnerships with, or formally support any of the following international initiatives to address undernutrition in low-income countries? (Tick all that apply) (For information only, not scored) | SUN Business Network |
| | | World Food Program |
| | | UNICEF |
| | | Save the Children |
| | | Zero Hunger Challenge |
| | | GAIN |
| | | Amsterdam Initiative against Malnutrition |
| | | Other – please state |

| Disclosure | | |
|--------------------------------|--|--|
| 23 | Does the company publish: (Tick all that apply) | Commitment/strategy for addressing undernutrition commercially |
| | | Commitment/strategy for addressing undernutrition through philanthropic/non-commercial approaches |
| | | Information about the external experts advising the company on undernutrition (names and expertise) |
| | | Studies on market need |
| | | Total philanthropic spending on undernutrition in last financial year |
| | | Managerial arrangements |
| A3 Quality of reporting | | |
| No. | Nutrition | |
| | Performance | |
| 1 | Does the company publish formal, regular reports on its overall approach to tackling nutrition issues and how often? | Annually (i.e. the company has an annual reporting cycle) |
| | | Less frequently than annually |
| | | No reporting |
| 2 | The company's reporting on preventing and addressing obesity and diet-related chronic diseases includes: (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 | What is the geographical scope of the company's nutrition reporting? | Reporting covers global operations |
| | | Reporting only covers major markets |
| | | No reporting |
| 4 | Does the company publish separate reports annually for different markets? | For several major national markets |
| | | For 1-2 national markets only |
| | | No additional reporting |
| 5 | 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 |
| 6 | 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 |
| No. | Undernutrition | |
| | Performance | |
| 7 | What types of commentary does the company's reporting provide on its work to tackle undernutrition in developing countries? | An extensive commentary on its work to prevent and address undernutrition in developing countries, including information about those reached, the impact of programs |
| | | A limited commentary on its work to prevent and address undernutrition in developing countries |
| | | No reporting on undernutrition |
| 8 | What does the reporting provide? | A clear sense of the company's undernutrition strategy and how it related to overall business strategy |

| | | |
|--|--|---|
| | | Clear reporting against all undernutrition-related objectives and targets |
| | | A clear outlook on future plans and targets on undernutrition |
| | | Explanation of the challenges, not only success/positive stories |
| | | None / not relevant |

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

| Category B Formulating appropriate products | | |
|---|--|---|
| B1 Product formulation ⁶ | | |
| 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? | Yes No or no information |
| 2 | What percentage of total 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 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 | How much has the company spent on research projects related to nutrition between 2012-2014 (US\$ mn)? (For information only, i.e. not scored) | |
| 5 | Does the company state that its approach to reformulating its existing products is aligned to national (or regional, e.g. EU) dietary guidelines? | National (or regional, e.g. EU) dietary guidelines No commitment to reformulating products or no information |
| 6 | Salt/sodium targets | |
|  | | |
| 6.1 | Has the company set a target to reduce levels of salt/sodium and, if so, in how many products or sub-categories? | The company has set a target to reduce levels of salt/sodium in all relevant products/sub-categories The company has set a target to reduce levels of salt/sodium in some relevant products/sub-categories. No salt target. Not applicable (explain) |
| 6.2 | 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. |
| 7 | Transfat targets | |
|  | | |
| 7.1 | Has the company set a target to reduce transfat that aligns to WHO recommendation of less than 1% of energy in a product being provided by transfat originating from partially hydrogenated vegetable oil in products? | Target aligns to WHO recommendation of less than 1% of energy in a product being provided by transfat originating from partially hydrogenated vegetable oil in products. Target does not align to WHO recommendation or no target. Not applicable (explain) |
| 7.2 | Baseline and target year | The company has specified a baseline year from which the reductions will be made. |

⁶ This Criterion asks questions about nutrients. If a nutrient is not relevant for a company related questions will be made not applicable.

| | | |
|---|---|---|
| | | The company has set a target year by when the reductions will be made. |
| 8 | Saturated fats targets | |
|  | | |
| 8.1 | Has the company set a target to reduce/reach lower levels of saturated fats and, if so, in how many products or sub-categories? | <p>The company has set a target to reduce/reach lower levels of saturated fats for all relevant products/sub-categories</p> <p>The company has set a target to reduce/reach lower levels of saturated fats for some relevant products/sub-categories</p> <p>The company has not set a target</p> <p>N/A - the company sets targets to reduce calories instead of saturated fats</p> |
| 8.2 | Baseline and target year | <p>The company has specified a baseline year from which the reductions will be made.</p> <p>The company has set a target year by when the reductions will be made.</p> |
| 9 | Added sugars targets | |
|  | | |
| 9.1 | Has the company set a target to reduce/reach lower levels of added sugars and, if so, in how many products/sub-categories? | <p>The company has set a target to reduce levels of added sugars for all relevant products/sub-categories</p> <p>The company has set a target for levels of added sugars for some relevant products/sub-categories</p> <p>No sugar target</p> <p>N/A - the company sets targets to reduce calories instead of added sugars</p> |
| 9.2 | Baseline and target year | <p>The company has specified a baseline year from which the reductions will be made.</p> <p>The company has set a target year by when the reductions will be made.</p> |
| 10 | Fruit targets | |
|  | | |
| 10.1 | Does the company have a target to increase levels of fruit in appropriate products? | <p>The company has set a target to increase levels of fruit in appropriate products</p> <p>The company has not set a target</p> <p>Not applicable (explain)</p> |
| 10.2 | Baseline and target year: (For information only, i.e. not scored) | <p>The company has specified a baseline year from which increases in fruit content will be made.</p> <p>The company has set a target year by when increases in fruit content will be achieved.</p> |
| 11 | Vegetables targets | |
|  | | |
| 11.1 | Does the company have a target to increase levels of vegetables in appropriate products? | <p>The company has set a target to increase levels of vegetables in appropriate products</p> <p>The company has not set a target</p> <p>Not applicable (explain)</p> |
| 11.2 | Baseline and target year: (For information only, i.e. not scored) | <p>The company has specified a baseline year from which increases in vegetable content will be made.</p> <p>The company has set a target year by when increases in vegetable content will be achieved.</p> |
| 12 | Wholegrain targets | |
|  | | |

| | | |
|---|--|---|
| 12.1 | Does the company have a target to increase levels of wholegrain in appropriate products? | The company has set a target to increase levels of wholegrains in appropriate products The company has not set a target Not applicable (explain) |
| 12.2 | 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. |
| 13  | Fibre targets | |
| 13.1 | Does the company have a target to increase levels of fibre in appropriate products? | The company has set a target to increase levels of fibre in appropriate products The company has not set a target Not applicable (explain) |
| 13.2 | Baseline and target year: (For information only, i.e. not scored) | The company has specified a baseline year from which increases in fibre levels will be made. The company has set a target year by when increases in fibre levels will be achieved. |
| 14 | When did the company set its earliest reformulation commitment? | Before 2008 In 2009 – 2011 In 2012 or 2013 Less than 1 year ago No targets or no information |
| Performance | | |
| 15   | Can the company provide evidence of having introduced new healthy products in the last three years? | |
| 16 | What percentage of those products were successful (i.e. stayed on the market for at least one year)? (For information only, i.e. not scored) | |
| 17  | What percentage of all relevant products (by number) met the company's sodium/salt target by FY 2014? | |
| 18  | What percentage of all relevant products (by number) met the company's sugar target by FY 2014? | |
| 19  | What percentage of all relevant products (by number) met the company's saturated fat target by FY 2014? | |
| 20  | What percentage of all relevant products (by number) met the company's transfat target by FY 2014? | |
| 21  | What percentage of the company's relevant products (by number) provided one serving or more of fruit (within one serving) by FY 2014? | |
| 22  | What percentage of the company's relevant products (by number) provided one serving or more of vegetables (within one serving) by FY 2014? | |
| 23  | What percentage of company's relevant products (by number) included wholegrains by FY 2014? | |

| | | |
|---|---|---|
| 24  | What percentage of the company's relevant products (by number) included fibre by FY 2014? | |
| 25  | Company's products that meet 'composite healthy standard'. | |
| 25.1  | Percentage of company's products that met its 'composite healthy standard' by 2014 | |
| 25.2  | By what percentage has the number of products that meet the company's 'composite healthy standard' increased between 2012 and 2014? | |
| 26  | Products that meet the healthy standard to be advertised to children under 12. | |
| 26.1  | What percentage (by number of products) of your US portfolio meet the standard to be advertised to children under 12 in 2014 (according to own NPS or to the CFBAI nutrition criteria (if a member): | |
| 26.2  | What percentage (by number of products) of your EU portfolio meet the standard to be advertised to children under 12 in 2014 (according to own NPS or the EU Pledge nutrition criteria (if a member): | |
| 26.3  | What percentage (by number of products) of your portfolio sold in the rest of the world (i.e. outside the EU and US) could be advertised to children under 12 in 2014 according to the company's own NPS? | |
| 27   | Across how many brands does the company offer products that meet the company's healthy standard for adults? | At least one product in all brands |
| | | At least one product in at least half of its brands |
| | | Fewer, or no information |
| 28   | Across how many brands does the company offer products that meet the company's healthy standard for children? | At least one product in all brands |
| | | At least one product in at least half of its brands |
| | | Fewer, or no information |
| 29  | How many examples can the company provide of having reduced product sizing and packaging to help consumers limit portion size? | More than 5 examples |
| | | 3 - 5 examples |
| | | No examples |

| Disclosure | | |
|-------------------|---|---|
| 30 | Does the company publish its: (Tick all that apply) | Spending on R&D |
| | | Targets for R&D spending on nutrition-related projects |
| | | Information on nutrition-related results of R&D |
| 31 | How many targets relating to key nutrients (as assessed above) does the company publish? | The company publishes targets for all relevant nutrients |
| | | The company publishes targets for some nutrients |
| | | The company does not publish any targets |
| 32 | Does the company publish: (Tick all that apply) | The number of new healthy products launched |
| | | A narrative on contribution of those healthy products to business performance |
| 33 | Does the company publish the percentage of products that meet its composite healthy standards? | Yes |
| | | No |
| 34 | Does the company publish separately the percentage of products that met targets of: (Tick all that apply) | Salt |
| | | Transfat |
| | | Saturated fat or calories |
| | | Vegetables (For information only, i.e. not scored) |
| | | Wholegrain |
| | | Total sugars or calories |
| | | Fruit (For information only, i.e. not scored) |
| 35 | Does the company publish: (Tick all that apply) | The percentage of its products that can be marketed to children, in any market? |
| | | The increase in percentage of its products that can be marketed to children, in any market? |
| Commitment | | |
| 36 | Has the company committed to tackle undernutrition and micronutrient deficiencies in developing countries through targeted fortification of its products (i.e. to respond to identified need?) (For information only, i.e. not scored) | Yes |
| | | No or no information |
| 37 | Has the company set targets with respect to increasing its R&D spending on developing fortified products OR with respect to the number of fortified products it intends to introduce? (For information only, i.e. not scored) | Yes |
| | | No or no information |
| 38 | Has the company committed to basing its approach to fortification on international guidance on fortification (i.e. CODEX CAC/GL 07-1987) and related, equivalent guidance that reflects international agreement on best practice and/or national interpretation of those standards? | Yes |
| | | No or no information |
| 39 | Has the company committed to seek to use ingredients with high inherent levels of micronutrients, where relevant? | Yes |
| | | No or no information |
| 40 | Has the company committed to fortifying only products of high underlying nutritional quality? | Yes |
| | | No or no information |

| | | |
|--------------------|--|---|
| 41 | Has the company committed to tackle undernutrition and micronutrient deficiencies in developing countries through initiatives that aim to increase the number/volume of fortified foods available to undernourished populations? | Yes |
| | | No or no information |
| 42 | Has the company set targets with respect to the level of financial support it will provide for food-focused programs/initiatives to tackle undernutrition in developing countries? (For information only, i.e. not scored) | Yes |
| | | No or no information |
| Performance | | |
| 43 | Can the company provide evidence of investment in research or other areas of the business to develop solutions to undernutrition? (For information only, i.e. not scored) | Yes |
| | | No or no information |
| 44 | Developing and selling fortified products | |
| 44.1 | Has the company developed fortified products in the last 2 years aimed at: (Tick all that apply) | Women of childbearing age |
| | | Children under 2 |
| | | Children between 2-5 |
| | | Children over 6 |
| | | Other population groups |
| 44.2 | Sold in which countries? | None |
| | | Sold in priority developing countries |
| | | Sold in developing countries not identified as highest priority |
| | | None of these or no information |
| 45 | Philanthropic programs | |
| 45.1 | Can the company provide evidence of funding programs to deliver products specifically formulated or appropriate for specific undernourished groups: (Tick all that apply) | Women of childbearing age |
| | | Children under 2 |
| | | Children between 2-5 |
| | | Children over 6 |
| | | Other populations |
| 45.2 | Can the company provide evidence of funding programs to develop or deliver products specifically formulated or appropriate for the undernourished in: (Tick all that apply) | In priority developing countries |
| | | In developing countries that are not identified as highest priority |
| | | In developed countries |
| 46 | How much has the company spent on such programs in FY 2014 (US\$ mn)? (for information only, i.e. not scored) | |
| Disclosure | | |
| 47 | Does the company publish: (Tick all that apply) | Commitments related to undernutrition |
| | | Targets related to undernutrition |
| | | Commitment to source ingredients of high nutritional quality |
| | | Commitment to fortify only products of high nutritional value |
| 48 | Does the company publish: (Tick all that apply) | A commentary on products developed for undernourished |
| | | A commentary on investments made in research or other areas of the business to develop solutions to undernutrition |
| 49 | Does the company publish, for its philanthropic/non-commercial programs: (Tick all that apply) | Evidence of funding programs to develop or deliver products specifically formulated or appropriate for the undernourished |
| | | Description of population groups targeted by programs funded |
| | | Description of geographic focus of programs funded |
| 50 | Does the company publish the amount spent on its philanthropic/non-commercial programs in FY 2014? | Yes all |
| | | Some |
| | | No or no information |

| B2 Nutrient profiling system | | |
|--|--|--|
| No. | Nutrition | |
| | Performance | |
| 1 | Does the company have an NPS? (For information only, i.e. not scored): | Yes No or no information |
| | If yes | |
| 1.1 | Is this NPS used to guide new product development/reformulation? | Yes No or no information |
| 1.2 | Is the NPS used to determine which products can be marketed to children? | Yes No or no information |
| 1.3 | Is the same system used for both purposes? | |
| 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 | | |
| No. | Nutrition | |
| | Commitments | |
| 1   | Does the company make a commitment to address the affordability of its healthy products? | Clear commitment made for whole business, with particular reference to low income populations Clear commitment made for whole business without particular reference to low income populations Broad commitment with particular reference to low income populations No commitments/no information |
| 2   | Has the company codified its affordability commitment with respect to healthy products within a formal policy? (For information only, i.e. not scored) | 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? (Tick all that apply) (For information only, i.e. not scored) | 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 |
| | | Broad commitment with particular reference to low income populations |
| | | No commitments/no information |
| | Performance | |
| 4  | How senior is the person to whom the company allocates the day-to-day responsibility for implementing the affordability policy? | Board |
| | | Named executive |
| | | Named manager |
| | | No responsibility allocated |
| 5  | Can the company demonstrate that it has done analysis on appropriate pricing of healthy products for low-income populations in developed and/or developing countries? (Tick all that apply) | In developed countries |
| | | Has identified healthy products to which to apply affordability pricing in those markets |
| | | In developing countries |
| | | Has identified healthy products to which to apply affordability pricing in those markets |
| 6  | Healthy product offering | |
| 6.1 | For developed markets, in how much % of product categories can the company provide evidence of offering one or more healthy variants affordable to populations in lowest 25% income bracket (or similar measure)? (For information only, i.e. not scored) | |
| 6.2 | For developing markets, in how much % of product categories can the company provide evidence of offering one or more healthy options affordable to populations in lowest 25% income bracket (or similar measure)? (For information only, i.e. not scored) | |
| 7  | Can the company provide examples that it has offered discounts, price promotions or coupons on healthy products at the same or greater rate as for less healthy products? (Tick all that apply) | Many examples in developed countries |
| | | Few examples in developed countries |
| | | Many examples in developing countries |
| | | Few examples in developing countries |
| | | None |
| | Disclosure | |
| 8  | Does the company publish: (Tick all that apply) | Commitment |
| | | Policy |
| | | Named person with responsibility |
| | | Commentary on availability of affordable options for low-income populations |
| No. | Undernutrition | |
| | Commitments | |
| 9 | With respect to improving the affordability of its fortified products, the company has a: (Tick all that apply) | Commitment |
| | | Policy (For information only, i.e. not scored) |
| | | Objectives |
| | | Targets (For information only, i.e. not scored) |
| 10 | Has the company committed to support other organisations' programs to improve the | Yes |
| | | No or no information |

| | | |
|--|---|---|
| | affordability of fortified products in developing countries? (For information only, i.e. not scored) | |
| | Performance | |
| 11 | Can the company provide evidence or examples of improving affordability by reducing product sizes fortified products to make them more affordable (absolutely or relatively to less healthy alternatives) or reduced/set pricing of fortified products specifically to enable low-income populations to better afford them? | In higher priority developing countries In lower priority developing countries No or no information |
| 12 | Can the company provide evidence of funding programs to improve the affordability of products specifically formulated or appropriate for specific undernourished groups either through: | Partnerships with expert agencies or organisations By setting up its own programs No or no information |
| | Disclosure | |
| 13 | With respect to making its healthy products affordable, does the company publish: (Tick all that apply) | Commitment Policy (For information only, i.e. not scored) Objectives (For information only, i.e. not scored) Targets (For information only, i.e. not scored) Many examples of improving the affordability of fortified products A few examples of improving affordability of fortified products No disclosure |
| 14 | With respect to products for the undernourished, does the company publish: (Tick all that apply) | Commitment to support programs addressing affordability of products for the undernourished Targets for funding or reach/impact of programs supported (For information only, i.e. not scored) Commentary on programs supported in this area Evidence of reach/impact of these programs (For information only, i.e. not scored) |
| C2 Product distribution | | |
| No. | Nutrition | |
| | Commitments | |
| 1   | Does the company make a clear and specific commitment to address the accessibility of healthy products? | Clear commitment made for whole business, with particular reference to low income populations Clear commitment made for whole business without particular reference to low income populations Broad commitment with particular reference to low income populations No commitments/no information |
| 2   | Has the company codified its commitment within a policy on distribution of its healthy products? (For information only, i.e. not scored) | Policy that applies to all product categories Policy that applies only to some product categories Policy under development No |
| 3   | Has the company set targets in the following area: (Tick all that apply) (For information only, i.e. not scored) | Number of new consumers to reach through improved distribution Number of low-income consumers to reach through improved distribution Number of units or sales value target related to extended distribution Number of new retail partners to achieve extended accessibility goals Investment planned in improving accessibility |
| | Performance | |

| | | |
|--------------------|---|--|
| 4 | How senior is the person to whom the company has allocated responsibility for implementing the 'healthy access' policy? | Board |
| | | Named executive |
| | | Named manager |
| | | No responsibility allocated |
| 5 | In which countries can the company demonstrate that it has done analysis of the accessibility of healthy products to low-income populations? | In developed countries |
| | | In developing countries |
| | | None or no information |
| 6 | Can the company provide examples of improving the accessibility of more healthy options? (Tick all that apply) | |
| 6.1 | For developed countries: | Arrangements/incentives with distributors re. how healthy products are distributed |
| | | Data to demonstrate that rural retailers are provided with healthy options as standard |
| | | Data to demonstrate that retailers in poor urban areas are provided with healthy options as standard |
| | | No evidence |
| 6.2 | For developing countries, how many examples can the company provide of improving the accessibility of one or more healthy options to populations in lowest 25% income bracket (or a similar measure of income)? (For information only, i.e. not scored) | More than 5 separate examples |
| | | 2-4 separate examples |
| | | 1 example |
| | | No evidence |
| Disclosure | | |
| 7 | Does the company publish: (Tick all that apply) | Commitment |
| | | Policy (For information only, i.e. not scored) |
| | | Named person with responsibility |
| | | Commentary on availability of affordable options for low-income populations |
| No. | Undernutrition | |
| | Commitments | |
| 8 | With respect to improving the distribution of its products specifically formulated or appropriate for specific undernourished groups, the company has: (Tick all that apply) | Commitment |
| | | Policy (For information only, i.e. not scored) |
| | | Objectives |
| | | Target (For information only, i.e. not scored) |
| 9 | Has the company committed to support programs to improve the accessibility of products specifically formulated or appropriate for specific undernourished groups in developing countries? (For information only, i.e. not scored) | Yes |
| | | No or no information |
| Performance | | |
| 10 | Can the company provide evidence or examples of improving accessibility of products specifically formulated or appropriate for specific undernourished groups? | In higher priority developing countries |
| | | In lower priority developing countries |
| | | No examples |
| 11 | How much has the company spent on such programs in FY 2014 (US\$ mn)? (For information only, i.e. not scored) | |

| | | |
|-------------------|--|--|
| 12 | Can the company can provide evidence of funding programs to improve the accessibility of products specifically formulated or appropriate for specific undernourished groups? (Tick all that apply) | Providing products to be distributed to undernourished populations |
| | | Providing products to school feeding programs |
| | | Using distribution systems to deliver micronutrient powders, supplements, etc. |
| | | Otherwise supporting programs designed to address undernutrition to reach target populations with appropriate products |
| | | No or no information |
| 13 | How much did the company spend on such programs in FY 2014 (US\$ mn)? (For information only, i.e. not scored) | |
| Disclosure | | |
| 14 | Disclosure of commercial strategy: (Tick all that apply) | |
| 14.1 | Does the company publish: | Commitment |
| | | Policy (For information only, i.e. not scored) |
| | | Objectives |
| | | Targets (For information only, i.e. not scored) |
| | | None of these |
| 14.2 | How many examples does the company publish to demonstrate its action to improve the accessibility of fortified products? | Many examples |
| | | A few examples |
| | | None |
| 15 | Does the company publish: (Tick all that apply) | Commitment to support programs addressing accessibility of products for the undernourished |
| | | Targets for funding or reach/impact of programs supported (For information only, i.e. not scored) |
| | | Commentary on programs supported in this area |
| | | Evidence of reach/impact of these programs (For information only, i.e. not scored) |
| | | None of these |

Section 3 - Influencing consumer choice and behaviour

| Category D Responsible marketing policies, compliance and spending | | |
|---|--|--|
| D1 Marketing policy: all consumers | | |
| No. | Nutrition | |
| | Commitments | |
| 1  | The company has a responsible marketing policy that applies to all consumers 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) |
| | | Cinema |
| | | Outdoor marketing |
| | | In store marketing/point of sales marketing |
| | | Sponsorship |

| | | |
|--|--|--|
| 2 | The company's policy includes the following commitments related to the representation of products: (Tick all that apply) | 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) (see definitions Appendix II) |
| | | 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) |
| | | Commits not to use any models with a BMI of under 18.5 (Industry best practice) |
| | | 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) |
| | | Commits to presenting products in the context of a balanced diet (industry best practice) |
| | | All of the above |
| | | Disclosure |
| 3 | Does the company publish its policy (or pledge to support the ICC Code), which is publicly available? | Yes, in full |
| | | Yes, in summary, not including details of scope of application |
| | | No |
| D2 - Auditing and compliance with policy: all consumers | | |
| No. | Nutrition | |
| | Performance | |
| 1 | Does the company audit its compliance 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? | Yes |
| | | No |

| D3 - Spending on marketing healthy products: all consumers ⁷ (For information only, i.e. not scored) | | |
|---|--|--|
| No. | Nutrition | |
| | Commitments | |
| 1   | Does the company have a commitment to increase its marketing spending on healthy products? | Yes |
| | | No |
| | Performance | |
| 2 | What percentage of the total marketing budget is allocated to marketing healthy products? (Non-scored question) | |
| 3 | What percentage of the total marketing budget for each media channel was dedicated to healthy products in FY 2014? (For information only, i.e. not scored) | |
| 3.1 | TV | |
| 3.2 | Third party websites | |
| 3.3 | Advertising on social media (i.e. Facebook, Twitter) | |
| 3.4 | Print (newspapers, magazines, etc.) | |
| 3.5 | Point of sales promotions and in-store marketing | |
| 4 | By what percentage did marketing spending on healthy products increase between FY 2012 and FY 2014, per channel? (For information only, i.e. not scored) | |
| 4.1 | TV | |
| 4.2 | Third party websites | |
| 4.3 | Advertising on social media (i.e. Facebook, Twitter) | |
| 4.4 | Print (newspapers, magazines, etc.) | |
| 4.5 | Point of sales promotions and in-store marketing | |
| 5   | Has the company increased spending on healthy products on the following channels between FY2011/12 and FY2013/14? (Tick all that apply) | TV |
| | | Third party websites |
| | | Advertising on social media |
| | | Print (newspapers, magazines, etc.) |
| | | Point of sales promotions and in-store marketing |
| 6 | By how much has the company increased its reach between FY2012 and FY 2014 via each channel to customers (US\$ mn)? (For information only, i.e. not scored): | |
| 6.1 | TV ads viewed for healthy products | |
| 6.2 | Total unique visitor views of ads on third party websites for healthy products | |
| 6.3 | Increased number of followers/likes on social media sites for healthy products | |
| 6.4 | Increased exposure through print (newspapers, magazines, etc.) of ads for healthy products | |
| 6.5 | In-store sales of healthy products linked to in-store promotions and point of sale promotions | |

⁷ For this criterion the healthy multiplier is only applied if the company uses an NPS to determine which products can be marketed to children.

| | | |
|--|--|--|
| 7 ♥ 🌐 | Can the company demonstrate increased reach for healthy products related to each channel between FY 2012 and 2014? (Tick all that apply) | TV |
| | | Third party websites |
| | | Advertising on social media (i.e. Facebook, Twitter) |
| | | Advertising on social media (i.e. Facebook, Twitter) |
| | | Point of sales promotions and in-store marketing |
| | Disclosure | |
| 8 ♥ | Does the company publish: (Tick all that apply) | Commitment |
| | | A commentary on its marketing spending on healthy products |
| | | Data on increased spending on marketing healthy products |
| | | And/or data to show increased reach of marketing of healthy products |
| No. | Undernutrition | |
| | Commitments | |
| 9 | Does the company make an explicit commitment to developing and delivering marketing strategies appropriate to reaching undernourished populations in developing countries? | Yes |
| | | No or no information |
| | Performance | |
| 10 | Can the company provide evidence of taking steps to understand and reach undernourished consumers in developing countries with appropriate products? (Tick all that apply) | Has done research to generate consumer and marketing insights relating to undernourished populations |
| | | Can demonstrate use of multiple communication channels from mass to social media to reach undernourished consumers |
| | | Has worked with creative agencies to ensure communication is compelling and attractive to undernourished consumers |
| | | Has worked with behavioral specialists to inform design of communications to drive desired behavior change |
| 11 | How much did the company spend globally on marketing products designed specifically for undernourished populations in FY2013/14 (US\$ mn)? (For information only, i.e. not scored) | |
| | | Disclosure |
| 12 | Has the company published a commentary on its efforts to design appropriate marketing for products intended for undernourished consumers? | Yes |
| | | No |
| D4 - Marketing policy: Children⁸ | | |
| No. | Nutrition | |
| | Commitments | |
| 1 ♥ 🌐 | Does the company have a responsible marketing policy for children that applies explicitly to the following media: (Tick all that apply) | TV & radio |
| | | Own websites |
| | | Third party websites |
| | | DVDs/CDs/GAMES |
| | | Social media (FB, Twitter feeds of company, bands) |
| | | All print media (newspapers, magazines, books, and printed advertising in public places) |
| | | Outdoor marketing |
| | | In store marketing/point of sales marketing |
| | | Sponsorship |
| | | All of the above |

⁸ For this criterion the healthy multiplier is only applied if the company uses an NPS to determine which products can be marketed to children.

| | | |
|-------------|--|--|
| 2 ♥ 🌐 | 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 |
| 3 ♥ 🌐 | 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 |
| 4 ♥ 🌐 | 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 |
| 5 ♥ 🌐 | 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 |
| 6 ♥ 🌐 | Does the company commit to use celebrities responsibly or not at all? (Tick all that apply) | Commits not to sponsor materials, people or activities popular with children (other than sports activities) except in conjunction with healthy product |
| | | 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 |
| 7 ♥ 🌐 | 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 ALL FORMS OF MARKETING |
| | | 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, with an exception for point of sale and packaging |
| | | Pledges not to use 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 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 |
| 8 ♥ 🌐 | Does the company commit to use promotional toys, games, vouchers and competitions responsibly by using them only in relation to healthy foods? (Tick all that apply) | Promotional games, toys, vouchers, competitions etc. are used only in relation to healthy foods |
| | | No commitment |
| 9 🌐 | Advertising to children aged 2-6 | |

| | | |
|---------------------|--|---|
| 9.1 ♥ | What percentage audience threshold for children aged 2-6 does the company use to restrict its TV advertising? | <25% |
| | | 26-35% |
| | | >36% |
| | | >50% |
| | | No audience threshold |
| 9.2 ♥ | What kind of products does the company advertise to children aged 2-6? | No products |
| | | Healthy products only |
| | | All products |
| 10 🌐 | Advertising to children aged 7-12 | |
| 10.1 ♥ | What percentage audience threshold for children aged 7-12 does the company use to restrict its TV advertising? | <25% |
| | | 26 - 35% |
| | | >36% |
| | | >50% |
| | | No audience threshold |
| 10.2 ♥ | What kind of products does the company advertise for children aged 7-12? | No products |
| | | Healthy products only |
| | | All products |
| 11 🌐 | Advertising to children aged 13 and over | |
| 11.1 ♥ | What percentage audience threshold for children aged 13 and over does the company use to restrict its TV advertising? (For information only, i.e. not scored) | <25% |
| | | 26 - 35% |
| | | >35% |
| | | >50% |
| | | No audience threshold |
| 11.2 ♥ | What kind of products does the company advertise for children aged 13 and over? (For information only, i.e. not scored) | No products |
| | | Healthy products only |
| | | All products |
| 12 ♥ 🌐 | Does the company utilize tools to ensure that its online marketing deters certain age groups? (Tick all that apply) | Ensuring design of websites/pages is appropriate to over 12s predominantly, i.e. not designed to attract younger children |
| | | Age screening prior to logging on/registering (e.g. enter DOB or require parent to consent) |
| | | Review of traffic data to determine demographic visiting sites |
| | | Nature of third party websites chosen to advertise on (i.e. ages targeted) |
| 13 ♥ 🌐 | To which online media does the company apply the tools listed above? | Own its own corporate and brand websites, third party websites and mobile media |
| | | Only two of the three |
| | | Only one of the three or not clear |
| | | No separate consideration of how to address 'child audience' for these media |
| | | |
| 14 ♥ 🌐 | Does the company utilize tools to deter certain age groups from viewing certain marketing by only advertising healthy products within games/movies intended for over 12s and /or ensuring that the design of ads is appropriate to over 12s predominantly (i.e. not designed to appeal to younger children)? | Both tools |
| | | Only one tool |
| | | None of these tools |

| | | |
|--|---|---|
| 15   | To what extent does the company commit to a responsible marketing approach near and in PRIMARY schools (schools for children up to age 11)? (Tick all that apply) | No marketing or advertising IN PRIMARY schools |
| | | Only marketing/advertising 'healthy' products in PRIMARY schools in agreement with schools/parents |
| | | Commitment extends to places NEAR PRIMARY schools |
| | | Commitment applies explicitly to new media marketing/advertising techniques |
| | | Commitment includes only offering 'educational materials' when in agreement with schools/parents |
| | | The company does not commit to this or no information |
| 16   | To what extent does the company commit to a responsible marketing approach near and in SECONDARY schools (schools for children between the ages of 12 and 18)? (Tick all that apply) | No marketing or advertising in SECONDARY schools |
| | | Only marketing/advertising 'healthy' products in SECONDARY schools in agreement with schools/parents |
| | | Commitment extends to places NEAR SECONDARY schools |
| | | Commitment applies explicitly to new media marketing/advertising techniques |
| | | Commitment includes only offering 'educational materials' when in agreement with schools/parents |
| | | The company does not commit to this or no information |
| 17   | To what extent does the company commit to a responsible marketing approach in other places where children gather (childcare and other educational establishments, family and child clinics, paediatric services or other health facilities, sporting or cultural events held at those premises) | No marketing or advertising in and NEAR these settings |
| | | No marketing or advertising in these settings |
| | | Only marketing/advertising healthy products near these settings in consultation with their management and users (but not in them) |
| | | Only marketing/advertising healthy products in and near these settings in consultation with their management and users |
| | | No commitment to one of the above options or no information |
| | | |
| Disclosure | | |
| 18 | Does the company publish its policy in full or it follows an industry Pledge or Initiative that is publicly available? | Yes, policy or Pledge that is published in full |
| | | Yes, policy or Pledge published in summary only |
| | | No |
| D5 Auditing and compliance with policy: Children | | |
| 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: | The company appoints an independent auditor |
| | | 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: | The company audits compliance across all media |
| | | The company audits compliance across 2 or 3 forms of media |
| | | The company audits compliance across 1 form of media/scope is unclear but there is clear evidence of auditing |
| | | No audit |
| 5  | What is the company's individual compliance level for TV and internet marketing? (%) | Individual compliance level for TV: |
| | | Individual compliance level for internet based media: |
| 6  | Does the company have a clear commitment to corrective action? | Clear commitment to corrective action, if needed |
| | | No commitment to corrective action |

| Disclosure | | |
|---|--|---|
| 7 | What level of detail does the company publish about its compliance levels? | The company publishes its individual compliance level for both TV and internet-based media based on an audit of multiple markets. |
| | | The company publishes its individual global compliance level for only one medium based on an audit of multiple markets. |
| | | The company publishes the aggregate compliance level of an industry audit (based on an audit of multiple markets) but does not provide its individual compliance level. |
| | | No public disclosure on audit results/No evidence of audits being conducted. |
| D6 Spending on advertising healthy products: Children (For information only, i.e. not scored) | | |
| No. | Nutrition | |
| Commitments | | |
| 1   | Does the company have a commitment to increase its marketing of healthy products to children? | Yes |
| | | No or no information |
| Performance | | |
| 2 | What percentage of the total marketing budget for marketing to children is allocated to marketing healthy products? (For information only, i.e. not scored) | |
| 3 | What percentage of the total marketing spend for each media channel is dedicated to healthy products aimed at children in FY2013/14: (For information only, i.e. not scored) | |
| 3.1 | TV | |
| 3.2 | Third party websites | |
| 3.3 | Advertising on social media (i.e. Facebook, Twitter) | |
| 3.4 | Print (newspapers, magazines, etc.) | |
| 3.5 | Point of sales promotions and in-store marketing | |
| 4 | By how much (%) did marketing spending on healthy products to children increase between FY 2011/12 and FY 2013/14? (For information only, i.e. not scored): | |
| 4.1 | TV | |
| 4.2 | Third party websites | |
| 4.3 | Advertising on social media (i.e. Facebook, Twitter) | |
| 4.4 | Print (newspapers, magazines, etc.) | |
| 4.5 | Point of sales promotions and in-store marketing | |
| 5   | Did the company increase its spending on healthy products for children on the following channels between FY2011/12 and FY2013/14? (Tick all that apply) | TV |
| | | Third party websites |
| | | Advertising on social media (i.e. Facebook, Twitter) |
| | | Print (newspapers, magazines, etc.,) |
| 6 | By how much (in %) has the company increased its reach for healthy products between FY2012 and FY 2014 via each channel to children (For information only, i.e. not scored): | |
| 6.1 | TV ads viewed for healthy products | |
| 6.2 | Total unique visitor views of ads on third party websites for healthy products | |
| 6.3 | Increased number of followers/likes on social media sites for healthy products | |

| | | |
|-------------------|---|---|
| 6.4 | Increased exposure through print (newspapers, magazines, etc.) of ads for healthy products | |
| 6.5 | In-store sales of healthy products linked to in-store promotions and point of sale promotions | |
| 7 ♥ 🌐 | Can the company demonstrate increased reach/sales for healthy products for children related to each channel between FY 2012 and 2014? (Tick all that apply) | TV Third party websites Advertising on social media Print (newspapers, magazines, etc.) Point of sales promotions and in-store marketing |
| Disclosure | | |
| 8 | The company publishes: (Tick all that apply) | Commitment A commentary on its marketing spending on healthy products directed to children Data on increased spending on marketing healthy products directed to children Data to show increased reach of marketing of healthy products to children |

Category E Supporting healthy diets and active lifestyles

E1 Supporting staff health & wellness

| No. | Nutrition | |
|-----------------------|---|---|
| Commitments | | |
| 1 🌐 | Does the company make a commitment to support staff health and wellness 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? | More than 70% of staff 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 for health and business outcomes Clear articulation of 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 |
| | | 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 | By how much has participation in the nutrition-related element of the programs increased since 2011 (in percentage terms) across the whole company and all operations? | By more than 20% |
| | | By between 10 and 19% |
| | | Between 1 - 5% |
| | | 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 publish: (Tick all that apply) | Commitment |
| | | Targets |
| | | Expected outcomes (either health or business) |
| | | Description of the program |
| | | Numbers participating |
| 11 | Does the company publish a narrative commentary on the outcomes of the nutrition, diet and activity elements of its health and wellness program? | Narrative covers health and business outcomes |
| | | Narrative covers health or business outcomes only |
| | | Narrative does not include commentary on outcomes or no information published |
| 12 | Does the company publish quantitative information on the outcomes of the nutrition, diet and activity elements of its health and wellness program? | Yes |
| | | No |
| 13 | Does the company publish evaluations of any of the nutrition, diet and activity elements of its health and wellness program? | Full evaluation published |
| | | Summary evaluation published |
| | | No |

| E2 Supporting breastfeeding mothers at work | | |
|--|---|--|
| No. | Nutrition | |
| | Commitments | |
| 1 | Does the company commit to providing breastfeeding mothers with appropriate working conditions and facilities at work? | 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 No or no information |
| | 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 |
| | Provide fridges for storing breast-milk as part of the private, hygienic, safe rooms for expressing breast-milk? | Yes No or no information |
| | Allow breastfeeding mothers breaks to express milk? | Yes No or no information |
| | Offer flexible working arrangements to support breastfeeding mothers? | Yes No or no information |
| | All the commitments and policies in category E2 are applied: | Globally Major markets only Home market only |
| | Disclosure | |
| 4 | Does the company publish its policy on supporting breastfeeding mothers? | Yes No or no information |
| 5 | Does the company publish a commentary about how it supports breastfeeding mothers within the workplace? | Yes No or no information |
| E3 Supporting consumer-oriented healthy eating and active lifestyle programs | | |
| No. | Nutrition | |
| | Commitments | |
| 1 | Does the company have a written policy and guidelines on the programs it will sponsor/fund? | |
| 1.1 | For nutrition education/healthy diet oriented programs: | Commitment to align programs to national dietary guidelines Clear policy that excludes brand-level sponsorship Policy that doesn't exclude brand-level sponsorship No or no information |
| 1.2 | For active lifestyle programs (sports, physical activity) | Clear policy that excludes brand-level sponsorship Policy that doesn't exclude brand-level sponsorship No or no information |
| 2 | What types of programs does the company commit to supporting? | For healthy eating/nutrition education programs for its consumers and/or local communities: For active lifestyle programs for its consumers and/or local communities? |
| | Performance | |
| 3 | How much did the company spend in FY 2014 on corporate-level branded or non-branded programs (US\$ mn)? (For information only, i.e. not scored) | |

| | | |
|---|--|--|
| 3.1 | Consumer/local community-orientated nutrition education/healthy diet programs | |
| | Funded through a commercial budget | |
| | Funded through a philanthropic/non-commercial budget | |
| 3.2 | Consumer/local community-orientated active lifestyle programs: | |
| | Funded through a commercial budget | |
| | Funded through a philanthropic/non-commercial budget | |
| 4  | Integration of company's programs | |
| 4.1 | Are all of the companies' programs 'integrated', i.e. do they incorporate nutrition, diet and activity elements? | Yes No or no information |
| 4.2 | For the nutrition education/healthy eating programs, does the company write the content or is it written by an independent third party, over which the company has no editorial control? | Yes, all programs/websites/material Some programs/websites/material No or no information |
| 4.3 | Are the physical activity programs designed and implemented by an independent third party in such a way as the company does not direct the content and structure of the program? | Yes, in all cases In some cases No or no information |
| 5  | Are the programs' health impacts independently evaluated? | In all cases, embedded in design of programs In some cases No or no information |
| | Disclosure | |
| 6 | The company publishes: (Tick all that apply) | Policy on commercial funding of healthy eating/nutrition education and physical activity programs Commitments re. types of programs to be funded commercially A description of the nutrition education/healthy eating programs, making clear the company's role A description of the physical activity programs, making clear the company's role |
| 7 | Does the company publish all or some of the independent evaluations carried out for the programs it supports? | All Some No or no information |
| No. | Undernutrition | |
| | Commitments | |
| 8 | Does the company and/or foundation have a written policy and guidelines on the kinds of programs relating to undernutrition it will sponsor/fund through its philanthropic programs? (For information only, i.e. not scored) | Written policy/guidelines No or no information |
| 9 | Does the company commit to funding programs that educate undernourished consumers about: (Tick all that apply) | Benefits of consuming fortified foods Benefits of maternal micronutrient supplementation Benefits of exclusive breastfeeding Benefits of safe, timely and adequate complementary feeding for infants and young children Benefits of dietary supplementation for infants and young children Benefits of infant/child micronutrient supplementation Benefits of a diverse diet |

| | | |
|--------------------|---|---|
| 10 | What kinds of programs does the company commit to supporting among undernourished consumers and/or local communities? (For information only, i.e. not scored) | Commits to EXCLUSIVELY supporting programs developed and implemented by independent organizations with relevant expertise |
| | | Commits to supporting programs developed and implemented by independent organizations IN ADDITION TO ITS OWN PROGRAMS |
| | | No commitment or only to offer own programs |
| 11 | Is the company's commitment targeted at: | Higher priority developing countries |
| | | Lower priority developing countries |
| | | Other countries/not clear/no information |
| Performance | | |
| 12 | How much did the company spend in FY 2014 on the following programs (in US\$ mn): (For information only, i.e. not scored) | |
| 12.1 | Consumer/local community-orientated nutrition education/healthy diet programs: | |
| 12.2 | Supplier/farmer orientated nutrition/healthy diet programs: | |
| 13 | Are all or some of the company's programs designed and implemented by an independent third party so that the company does not direct the content or structure of the program? (For information only, i.e. not scored) | Yes, in all cases |
| | | In some cases |
| | | No or no information |
| 14 | Does the company evaluate all or some of the programs' impacts independently? (For information only, i.e. not scored) | In all cases, embedded in design of programs |
| | | In some cases |
| | | No or no information |
| Disclosure | | |
| 15 | The company publishes its: (Tick all that apply) | Policy on funding nutrition education programs for the undernourished (For information only, i.e. not scored) |
| | | Commitments re. types of programs to be funded commercially |
| | | A full description of the programs, making clear the company's role |
| | | A limited description of the programs and/or no clarity re. company's role |
| 16 | Does the company publish all or some of the impact evaluations carried out for the programs it supports? (For information only, i.e. not scored) | All |
| | | Some |
| | | No or no information |

Category F Product labelling and use of health and nutrition claims

F1 Product labelling

| No. | Nutrition | |
|--|---|------------------------------------|
| Commitments | | |
| 1  | Does the company commit to disclose nutritional information on its products: | Back-of-pack and front-of-pack |
| | | Back-of-pack OR front-of-pack only |
| | | No or no information |
| 2  | Does the company commit to providing information on the quantity of nutrients as a percentage of the Guideline Daily Amounts and/or Daily Values on its product packages? | Yes |
| | | No or no information |

| Commitments for Back of pack labelling | | |
|--|---|---|
| 3  | Does the company commit (where legal) to provide Back-of-Pack nutrition information on key relevant nutrients? (Tick all that apply) | Energy/calories |
| | | Protein |
| | | Total carbohydrates |
| | | Total or added/free sugars |
| | | Transfat |
| | | Total fat |
| | | Saturated fat |
| | | Dietary fiber |
| | | Sodium (salt) |
| All of these | | |
| 4  | Does the company state for products packaged as a single portion or with multiple portions or servings, a commitment to providing nutritional information on a per serving or per portion basis, as quantified on the label, or on a per 100g or per 100ml basis, and stating the number of portions or servings contained in the package. (Codex CAC/GL 2-1985)? | Yes for both single portion and multiple portion |
| | | Yes for either single or multiple portion |
| | | No or no information |
| Commitments for Front of pack labelling | | |
| 5  | 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 | | |
| 6 | In what percentage of markets has the company rolled out its full labelling commitments, i.e. all products in those markets are labelled according to the commitments? | More than 80% |
| | | Between 50 - 79% |
| | | Between 6 - 49% |
| | | Less than 5% |
| 7 | In what percentage of markets does the company intend to have rolled out its full labelling commitments by the end of 2015, i.e. all products in those markets are labelled according to the commitments? | More than 80% |
| | | Between 50 - 79% |
| | | Between 6 - 49% |
| | | Less than 5% |
| Disclosure | | |
| 8 | Does the company publish a detailed policy/commitments on nutrition labeling? (Tick all that apply) | Geographic application of policy clearly set out |
| | | List of nutrients included on labels set out in policy |
| | | Commitment to labelling by per serving or per portion size etc. |
| | | Commitment to either BOP only or BOP and FOP |
| 9 | Does the company disclose the percentage of markets in which it has applied its labelling commitments in full? | Yes |
| | | No or no information |
| 10 | For what percentage of products does the company provide nutrition information online? | 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. | Undernutrition | |
| Commitments | | |
| 11 | Does the company commit to labeling products that either have naturally high levels of micronutrients or that have been fortified with micronutrients for all markets? | Yes, all relevant markets (i.e. developing countries) |
| | | No or not in all relevant markets (i.e. developing countries) |

| Disclosure | | |
|--|---|---|
| 12 | Does the company disclose its policy on labeling micronutrients for products that are targeted at consumers at risk of undernutrition for all markets? | Yes, all relevant markets (i.e. developing countries) No or not in all relevant markets (i.e. developing countries) |
| F2 Health and nutrition claims | | |
| No. | Nutrition | |
| Commitments | | |
| 1 | Does the company state that, for countries where no national regulatory system exists, it will place a health claim on a product only when it complies with Codex? | Yes No or no information |
| 2 | Does the company state that, for countries where there is no regulation of nutrition claims, it will only place a nutrition claim on a product if that claim complies with Codex? | Yes No or no information |
| Performance | | |
| 3   | Does the company track the number of products that meet its healthy standard that carry health claims and nutrition claims? | Yes both health and nutrition claims Only health claims Only nutrition claims No or no information |
| Disclosure | | |
| 4  | Does the company disclose its commitments on its use of: | Nutrition content and health claims Either health or nutrition content claims, not both No |
| 5  | Does the company disclose the percentage of SKUs, by number, that meet its healthy standard and that carry nutrition contents or health claims? | |
| 5.1  | Does the company disclose the percentage of SKUs, by number, that meet its healthy standard and carry nutrition content claims publicly or to ATNI? | Yes publicly and/or to ATNI To ATNI only No |
| 5.2  | Does the company disclose the percentage of SKUs by number that meet its healthy standard and that carry health claims publicly or to ATNI? | Yes publicly and/or to ATNI To ATNI only No |
| 6  | Does the company disclose whether any complaints have been upheld against it about the mis-use of health or nutrition content claims? | Yes No |
| No. | Undernutrition | |
| Commitments | | |
| 7 | Does the company commit to using nutrition or health claims on products that have been fortified ONLY when they meet Codex standards? | Yes, in all markets No, or not in all markets |
| Disclosure | | |
| 8 | Does the company disclose its policy on using health and nutrition claims on fortified products? | Yes No |
| Category G Influencing governments and policymakers, and stakeholder engagement | | |
| G1 Lobbying and influencing governments and policymakers | | |
| No. | Nutrition | |
| Commitments | | |
| 1  | Does the company commit to only to lobbying governments, and engaging with political parties, policymakers and policymaking bodies in support of preventing and addressing obesity and diet-related chronic diseases? (For information only, i.e. not scored) | Commitment clearly extends to lobbying conducted by third parties paid by the company Commitment only appears to cover lobbying done by company directly No or no information |

| Disclosure | | |
|----------------------------------|---|---|
| 2 | Does the company publish its policy on lobbying and donations or Code of Business Ethics etc.? | Yes No |
| 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 organisations 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 on its lobbying measures to prevent and address 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) | Health and nutrition claims/ regulatory development Front of pack labelling Fiscal instruments related to nutrition Marketing to children |
| No. | Undernutrition | |
| | Commitments | |
| 5 | Does the company commit to play an active and constructive part, in developing countries (non-OECD members), in supporting governments' efforts to address undernutrition? | Yes No or no information |
| | Performance | |
| 6 | Can the company provide examples of supporting developing country governments' efforts to introduce policy or regulation to address undernutrition? (For information only, i.e. not scored) | Three examples Two examples 1 example No examples |
| | Disclosure | |
| 7 | Does the company publish a narrative about its activities related to supporting developing country governments address undernutrition? | Yes No |
| G2 Stakeholder engagement | | |
| No. | Nutrition | |
| | Commitments | |
| 1 | Does the company follow the AA1000 Standard to structure its stakeholder engagement? | 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? | Extensive engagement with international and local stakeholders Extensive engagement with (local) home country stakeholders Limited engagement with either international or local stakeholders No or no information |

| | | |
|------------|--|--|
| | Disclosure | |
| 4 | Does the company explain how input from stakeholders has been used? | Specific examples of how input has been used to adapt policies/programs, i.e. to change business practices |
| | | Broad statement about the benefits of stakeholder dialog |
| | | No |
| No. | Undernutrition | |
| | Performance | |
| 5 | Can companies provide evidence of one-to-one discussions with key organizations working on undernutrition to solicit input on its commercial strategy/policy/approach to undernutrition? | More than 3 organizations |
| | | 1-2 organizations |
| | | No such discussions |
| | Disclosure | |
| 6 | Does the company provide a narrative about its stakeholder engagement activities related to undernutrition? | Yes |
| | | No |

Appendix I

ATNI Expert Group members

The mandate of the ATNI Expert Group is to provide input into the development of the Corporate Profile methodology. This group consists of members with expertise in various aspects of nutrition (including both undernutrition, and obesity and diet-related chronic diseases).

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. Members are listed below.

Shiriki Kumanyika

Chair ATNI Expert Group; Professor of Epidemiology, Department of Biostatistics and Epidemiology, Perelman School of Medicine, University of Pennsylvania

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

CS Pandav

Professor and Head, Centre for Community Medicine, All India Institute of Medical Sciences

Mike Rayner

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

Linda Meyers

Senior Science Advisor for the American Society for Nutrition (ASN)

Boyd Swinburn

Professor of Population Nutrition and Global Health at the University of Auckland and Alfred Deakin Professor and Director of the World Health Organisation (WHO) Collaborating Centre for Obesity Prevention at Deakin University in Melbourne

Kapil Yadav

Assistant Professor, Centre for Community Medicine, All India Institute of Medical Sciences

Appendix II

General definitions list

| | |
|--|---|
| Commercial activities | Related to core business, funded through annual commercial budgets, as distinct from philanthropic activities funded from post-tax profits. |
| Commitments | Company's commitment(s) to take action on any topic. A commitment is what the company pledges to do. This is different to an objective/goal or target which are both more specific than a commitment. |
| Developing countries | Countries that are not OECD members, i.e. those not on this list: http://oecd.org/about/membersandpartners/ |
| Food and beverage manufacturers | Companies that produce packaged/processed foods and beverages. In ATNI, this excludes those companies that simply process milk, meat, fish, oil etc. before selling it, and those that make alcoholic beverages. |
| Geographic multiplier | In order to reward companies that make commitments or deliver commitments on a global basis, rather than a more limited geographic basis, a company's score on the scope of its policy or performance is in some cases multiplied (e.g. by 1.5 if that policy or performance applies to multiple major markets, or by 2 if it applies globally). |
| Health claim | Any statement made by a company about a relationship between food and health related to its products, in the context of formal regulated health claims placed on products. |
| Healthy multiplier | A healthy multiplier is applied to any scores for questions that ask about commitments or performance relating to 'healthy' products. The multiplier is derived from the company's score on B2 (but is not the actual score). |
| Healthy products | Those products of high nutritional quality as assessed by a robust nutrient profiling system. |
| High(er) priority countries | In this context, i.e. relating to nutrition and health, non-OECD countries that are classified as low-income and lower-middle-income economies by the World Bank, which have high levels of infant mortality (more than 10 per 1000 in under 5s) and acute malnutrition (more than 2% in under 5s) according to data from UNICEF (see the full list in Appendix IV).. ATNI aims to encourage companies to focus their activities to tackle undernutrition in these countries. |
| ICC (framework for responsible food and beverage marketing communication) | International Chamber of Commerce framework for responsible food and beverage marketing communication. |
| Lower priority country | In this context, i.e. relating to nutrition and health, non-OECD countries which do not have high levels of infant mortality (more than 10 per 1000 in under 5s) and acute malnutrition (more than 2% in under 5s) according to data from UNICEF. |
| Negative food components | Salt, added sugars, trans fats, saturated fats. |
| Nutrient profiling systems | A system that classifies food and beverages according to their nutritional composition. |
| Nutrition (or nutrient content) claim | Any claim made by a company about its product which states, suggests or implies that a food has particular beneficial nutritional properties due to the energy (calorific value) provides, provides at a reduced or increased rate or does not provide, and/or the nutrients or other substances it contains or contains in reduced or increased proportions or does not contain. |
| Performance | What a company's does/delivers on a particular topic. |
| Philanthropic/non-commercial | Not related to core business – funded out of post-tax profits or other non-commercial budgets or revenue streams. |
| Policy | A written formalized document, usually signed off by the Board. |
| Positive food components | Fruits, vegetables, fibers, wholegrains. |
| Disclosure | Information a company publishes. |
| SKUs | Stock Keeping Unit |
| Undernourished | People that eat less than the minimum amount of the foods, especially micronutrients, essential for sound health and growth. |

Appendix III

Explanations of specific indicators

| Section 1 - Nutrition governance and management | |
|--|---|
| Category A Corporate strategy, management and governance | |
| A1 Corporate nutrition strategy | |
| A1.1 | This indicator aims to assess the extent to which a company's commitment to address health and nutrition challenges is embedded in its mission and strategy. |
| A1.2 | Commitment to deliver more, healthy foods to low-income populations can be either in developed or developing countries, or both. |
| A1.4 | Extensive risk assessment encompasses litigation risk, trend analysis, regulatory risk, market risk, specific category or brand risk and reputational risk. |
| A1.6 | This indicator is not assessed when the company has not made acquisitions, disposals, formed joint ventures or other partnerships in the last 3 years. Neither does this assessment include acquisitions, disposals and forming joint ventures or other partnerships in the supply chain. |
| A1.11 | Credit will only be given for a formal commitment or a statement by a senior executive. |
| A1.13 | This indicator maps products that are specifically formulated or fortified to address specific micronutrient deficiencies among specific populations only in developing countries. |
| A2 Nutrition governance and management systems | |
| A2.1 | A 'nutrition strategy' or 'nutrition policy' is a formal document that sets out the company's approach to addressing key nutrition issues. ATNF defines a 'comprehensive' strategy or policy as covering all ATNI categories A-G (corporate strategy, formulation of appropriate products, availability and affordability, marketing, healthy lifestyle, labelling and engagement). A limited strategy or policy encompasses only some of these issues. |
| A2.2 | Comprehensive means all or most topics covered in ATNI categories A-G (corporate strategy, formulation of appropriate products, availability and affordability, marketing, healthy lifestyle, labelling and engagement) are included. Limited means not all key topics are covered. |
| A2.4 | Formal panel means a panel appointed by the company which it consults regularly. Informal/ad-hoc means occasional consultations of experts but there is no formal panel. |
| Undernutrition | All indicators relate only to the company's efforts to addressing undernutrition in developing countries. It does not cover developed countries. |
| A2.10 | Credit is given for activities funded either by the company as part of its CSR and/or philanthropic activities. In respect of the latter, credit is only given if the company directs the focus and design of the philanthropic activities. Credit is not given in situations where the company donates or donated money to its own foundation but does not direct or oversee the foundation's activities. |
| A2.14 | Developing countries are countries that are not OECD members, i.e. those not on this list: http://oecd.org/about/membersandpartners/ |
| A2.17 | Strategic and well-structured means that company has articulated a clear rationale of and approach for focusing on micronutrient deficiencies through product fortification in developing countries which is based on a clear process with specific steps in all countries. |
| A2.18 | Strategic and well-structured means that company has articulated a clear rationale of and approach for focusing on micronutrient deficiencies through product fortification in developing countries which is based on a clear process with specific steps in all countries. |
| A2.19 | The executive or manager does not have a responsibility solely for the undernutrition strategy; that responsibility can be one of several. |
| A2.20 | Formal panel means a panel appointed by the company which it consults regularly. Informal/ad-hoc means when occasional consultations of experts but there is no formal panel. |
| A2.21.1 | Credit is given for activities funded by the company's philanthropic programs only if the company directs the focus and design of those programs. Credit is not given in situations where the company donates or donated money to its own foundation but does not direct or oversee the foundation's activities. |

A3 Quality of reporting

A3.1 The report/ document may form part of a CSR and/or sustainability report; it does not have to be a separate report on nutrition to gain credit.

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

Category B Formulating appropriate products

B1 Product formulation [1]

| | |
|----------------|--|
| B1.2 | The figure may include spending on both internal R&D and company funded R&D carried out by external organisations. |
| B1.4 | The figure may include spending on both internal R&D and company funded R&D carried out by external organisations. |
| B1.6.1 | Relevant products/sub-categories means all of those that contain salt or sodium. |
| B1.7.1 | All relevant products/sub-categories means all of those that contain transfat. |
| B1.8.1 | All relevant products/sub-categories means all of those that contain saturated fats. |
| B1.9.1 | All relevant products/sub-categories means all of those that contain added sugars. |
| B1.10.1 | All relevant products/sub-categories means all of those to which fruit could reasonably be added. |
| B1.11.1 | All relevant products/sub-categories means all of those to which vegetables could reasonably be added. |
| B1.12.1 | All relevant products/sub-categories means all of those to which wholegrains could reasonably be added. |
| B1.13 | All relevant products/sub-categories means all of those to which fibre could reasonably be added. |
| B1.25.1 | Composite healthy standard means the overall threshold for 'healthy' within the company's nutrient profiling system. |
| B1.29 | This indicator applies only to snacks (savory or sweet) or CSDs usually bought in single packs or multipacks. If the company does not make these products, the indicator will not be scored. |
| B1.31 | This indicator covers both negative and positive nutrients. 'Relevant' means nutrients contained within the company's products. |
| B1.33 | Composite healthy standard means the overall threshold for 'healthy' within the company's nutrient profiling system. |
| B1.41 | Credit will be given if the company commits to tackle undernutrition through its own programs and/or by supporting other organizations' programs. |
| B1.43 | 'Other areas' means other than through fortifying or developing products. |
| B1.44.2 | Priority developing countries are classified as low-income and lower-middle-income economies by the World Bank, have more than 10 per 1000 under 5 mortality rate and more than 2% acute malnutrition (moderate and severe wasting) in under-5s (see the full list in Appendix IV) |
| B1.45.1 | This indicator may include products or micronutrient supplements, sprinkles etc. |
| B1.45.2 | Credit will be given for donating products to food banks in developed countries. |

C1 Product pricing

C1.12 Expert agencies or organisations can be local or international.

Section 3 - Influencing consumer choice and behavior

Category D Marketing Criterion

D1 Marketing policy: all consumers

D1.2 ICC (International Chamber of Commerce framework for responsible food and beverage marketing communication.)

D3 Spending on advertising of healthy products: all consumers

D3.3 This indicator excludes company's own websites and social media sites.

D3.4 This indicator excludes company's own websites and social media sites.

Category E Supporting healthy diets and active lifestyles

[1] This Criteria asks questions about nutrients. If a nutrient is not relevant for a company related questions will be made not applicable.

E1 Staff health and wellness programs

E1.3 Examples of business outcomes include reducing absenteeism, increasing productivity etc. Examples of health outcomes include people losing weight, lowering their blood pressure, cholesterol levels, taking part in exercise.

E3 Supporting consumer-oriented healthy eating and active lifestyle program

E3.2 Programs aimed at suppliers or farmers not covered by this indicator.

Category F Product labelling and use of health and nutrition claims

F1 Nutrition labelling

F1.5 Interpretative format means using colours or symbols or other graphics to help consumers to understand the information.

Category G Influencing governments and policymakers, and stakeholder engagement

G1 Lobbying and influencing governments and policymakers

G1.6 Examples can include supporting the government to require fortification of staples, to reduce tariffs on imported fortified staples, to require manufacturers to use fortified staples etc.

G1.7 This narrative can be included in a broader policy.

G2 Engagement with international organisations, civil society and academia

G2.2 Comprehensive, well-structured means the company engages with a wide range of nutrition stakeholders on a regular basis, asking for their feedback on its nutrition strategy, policy and performance – rather than simply presenting information and results to them.

G2.3 Extensive means the company engages with many nutrition stakeholders, both at Group level and within operating markets.
Limited means the company engages with only a few nutrition stakeholders.

G2.4 Key organisations includes, for example, Save the Children, Alive & Thrive, UNICEF, FAO, 1000 Days, World Food Programme, IFAD, National Aid Agencies, Zero Hunger Challenge.

Appendix IV

ATNI 2016 List of Priority Developing Countries

Selection criteria:

- Non-OECD member countries that are classified as low-income and lower-middle-income economies by the World Bank (Source: World Bank list of economies, May 2015) and have both "More than 10 per 1000 under 5 mortality rate" (Source: The State of the World's Children 2015: Reimagine the Future: Innovation for Every Child) and "More than 2% acute malnutrition (moderate and severe wasting) in under-5s" (Source: Joint Malnutrition dataset from UNICEF, World Bank and WHO, 2014).

| | | | |
|---------------------------------------|----------------------------------|----------------------------------|-----------------------------|
| Afghanistan | Ethiopia | Mauritania | Solomon Islands |
| Armenia | Gambia | Micronesia (Federated States of) | Somalia |
| Bangladesh | Ghana | Mongolia | South Sudan |
| Benin | Guinea | Morocco | Sri Lanka |
| Bhutan | Guinea-Bissau | Mozambique | Sudan |
| Burkina Faso | Guyana | Myanmar | Suriname |
| Burundi | Haiti | Nepal | Syrian Arab Republic |
| Cambodia | Chad | Niger | Tajikistan |
| Cameroon | India | Nigeria | Thailand |
| Cape Verde | Indonesia | Niue | Timor-Leste |
| Central African Republic | Kenya | Pakistan | Togo |
| Comoros | Kiribati | Papua New Guinea | Uganda |
| Congo | Kyrgyzstan | Philippines | United Republic of Tanzania |
| Côte d'Ivoire | Lao People's Democratic Republic | Republic of Moldova | Uzbekistan |
| Democratic People's Republic of Korea | Lesotho | Rwanda | Vanuatu |
| Democratic Republic of the Congo | Liberia | Sao Tome and Principe | Viet Nam |
| Djibouti | Madagascar | Rwanda | Yemen |
| Egypt | Malawi | Senegal | Zambia |
| Eritrea | Mali | Sierra Leone | Zimbabwe |



Access to Nutrition Foundation

Nieuwekade 9
3511 RV Utrecht
The Netherlands
+31 (0)30 230 56 48
info@accesstonutrition.org
www.accesstonutrition.org