

ACCESS TO
NUTRITION
INITIATIVE

Global Access to Nutrition Index 2021

Methodology

Development, structure, scope, contents,
scoring and results presentation

June 2020



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Abbreviations

ATNI	Access to Nutrition Initiative
BMS	Breast-Milk Substitutes
CF	Complementary Foods
CSO	Civil Society Organization
F&B	Food and Beverage
FLW	Food loss and Waste
FY	Financial Year
GAIN	Global Alliance for Improved Nutrition
HSR	Healthy Star Rating
ICC	International Chamber of Commerce
NCD	Non-Communicable Diseases
NDA	Non-Disclosure Agreement
NGO	Non-Governmental Organization
NPS	Nutrition Profiling System
OECD	Organisation for Economic Co-operation and Development
PP	Product Profile
SDG	Sustainable Development Goal
SASB	Sustainability Accounting Standards Board
SEC	Securities and Exchange Commission
SEM	Social Ecological Model
TGI	The George Institute for Global Health
UN	United Nations
UNICEF	United Nations International Children's Emergency Fund
WHA	World Health Assembly
WHO	World Health Organization
WHO ARCO	World Health Organization Regional Office for the Africa Region
WHO EMRO	World Health Organization Regional Office for the Eastern Mediterranean Region
WHO EURO	World Health Organization Regional Office for the European Region
WHO PAHO	World Health Organization Regional Office for the Pan-American Region
WHO SEAR	World Health Organization Regional Office for the South-East Asian Region
WHO WPR	World Health Organization Regional Office for the Western-Pacific Region



Introduction

The Access to Nutrition Initiative

The Access to Nutrition Initiative (ATNI)¹ is an independent, not-for-profit organization based in the Netherlands, which is dedicated to assessing objectively, and improving, the contribution of the private sector to addressing global nutrition challenges. ATNI is overseen by a Board of Directors and is independent from the companies it assesses, and the wider food and beverage industry. More information about ATNI's governance and operating policies is available [here](#).

The Global Index 2021² is funded by the Bill & Melinda Gates Foundation, the Dutch Ministry of Foreign Affairs and the United Kingdom's Department for International Development.

ATNI is backed by more than 70 institutional investment organizations that manage more than US\$7.5 trillion. They use ATNI's research in their investment research, and in their engagement with companies in which they are shareholders, to encourage them to improve their performance on nutrition in order to contribute to long-term shareholder value.

ATNI has a wide range of stakeholders. These include:

- Food and beverage (F&B) manufacturers assessed by the Indexes and their advisors;
- Other F&B companies, manufacturers, food retailers and others in the food processing value chain;
- F&B industry associations or groups;
- Investment banks, investment managers and investment sector associations;
- Non-government organizations (NGOs);
- United Nations (UN) agencies;
- Academia and experts;
- Governments and policymakers;
- Other commentators or opinion formers relating to the F&B sector, and health and nutrition.

This document

This document sets out the approach used to design and publish the *Global Access to Nutrition Index 2021* (Global Index 2021).³ Specifically, it details how the various elements of the Index have been developed, as well as their scope and content, and the research methods used. As the fourth such Index, it builds on the methodology and approaches used to research and publish all previous Indexes.

In 2020, one in every nine people in the world is hungry, and one in every three is overweight or obese. In many countries, undernutrition coexists with overweight, obesity and other diet-related non-communicable diseases (NCDs). At the same time, there are big inequalities between regions and within countries. Not one country is on course to meet all 10 of the World Health Assembly 2025 global nutrition targets and just eight of 194 countries are on track to meet four targets.

Almost a quarter of all children under five years of age are stunted. At the same time, overweight and obesity are increasing rapidly in nearly every country in the world, with no signs of slowing.⁴

¹ To reflect the strategic choice to expand the scope of its benchmarking work and develop new accountability tools, the organization chose and introduced a new name and branding (with adapted logo) in 2019: 'Access to Nutrition Initiative'. The acronym ATNI coincides with that of the Access to Nutrition Index, well known by all stakeholders working with, or making use of the organization's products since 2013. The organization's legal status as foundation and registration in The Netherlands as the 'Stichting Access to Nutrition Foundation' did not change.

² Due to COVID-19, the time frame and plan for this Global Index has changed; the research and company engagement phases have been amended and publication of the results will be later than planned. Due to the ongoing uncertainty, ATNI may adjust the timelines set out in this document further, and will consult with and inform stakeholders if this is the case.

³ The methodology to assess the marketing of Breast-milk Substitutes (BMS) and Complementary Foods (CF) is published separately.

⁴ Global Nutrition Report 2020: Act on equity to end malnutrition. Available at: www.globalnutritionreport.org



As of 2016, over 2 billion people worldwide were overweight or obese, with a large majority of them (70%) living in low- and middle-income countries.⁵ Meanwhile, demand for processed foods in these contexts has been increasing and is projected to keep rising in lower-middle and upper-middle income countries in particular.⁶ The United Nations Children's Fund's (UNICEF) flagship report in 2019 revealed that at least one in three children globally are not getting the nutrition they need to grow well.⁷ Given their scale and reach, and continued growth, global F&B companies have a huge influence on the lives of consumers and employees. They must play their part in helping to address the global nutrition crisis and achieving the 2030 targets of the [Sustainable Development Goals](#).

Although findings from the *Global Access to Nutrition Index 2018* indicated that the world's largest F&B companies had advanced their commitments to tackle various nutrition issues, less than a third of the products analyzed in the 2018 Global Product Profile were classified as 'healthy'. Further, the Global Index 2018 showed that the world's six largest baby food companies continue to market Breast-milk Substitutes (BMS) using marketing practices that do not meet the recommendations of the WHO International Code of Marketing of Breast-milk Substitutes and subsequent relevant World Health Assembly (WHA) resolutions (together known as 'The Code').

Like previous ATNI Indexes, work on the Global Index 2021 Methodology is guided by the Theory of Change (Figure 2, page 8), stakeholder engagement (from public and private sector), and input from ATNI's Expert Group and Board of Directors. Of note in the Global Index 2021, and a change from 2018, is the integration of the Product Profile into the Corporate Profile so that it contributes to the overall Global Index score and ranking. Like the 2018 Global Index, the Corporate Profile methodology assesses companies against international guidelines, standards and norms, and accepted good practices. When such guidance is not available, the assessment is based on the input of ATNI's Expert Group.

The following sections describe the approach that ATNI uses to develop its Indexes and the Theory of Change. It outlines the main topics addressed by each Index and provides an explanation of the different elements of the Indexes, i.e.: the Corporate Profile, the Product Profile and the BMS and Complementary Foods (CF) Marketing assessment. This Global Index 2021 Methodology document describes how companies are selected for inclusion, the approach used to collect data, and how companies are scored and ranked. The document concludes with commentary about ATNI's plans for future Global Indexes. A full description of the indicators used for the Global Index 2021 is included in Appendix I, and Appendix II describes ATNI's Expert Group.

5 Shekar, Meera, and Barry Popkin, eds. 2020. *Obesity: Health and Economic Consequences of an Impending Global Challenge*. Human Development Perspectives series. Washington, DC: World Bank. doi:10.1596/978-1-4648-1491-4.

6 Global Nutrition Report 2020: Act on equity to end malnutrition. Spotlight 4.3, pages 86-87. Available at: www.globalnutritionreport.org

7 UNICEF (2019). *The State of the World's Children 2019. Children, Food and Nutrition: Growing well in a changing world*. UNICEF, New York.



ATNI's conceptual framework

How it started: the first Global Index

ATNI's Global Index was initially developed between 2009 and 2013 by the Global Alliance for Improved Nutrition (GAIN), who built on the work of many other organizations, particularly other benchmarks and indexes, on other sustainability issues. It was designed through an extensive, multi-stakeholder consultative process. This approach was taken to ensure that the Index would be a useful tool for different stakeholder groups (including the World Health Organization (WHO) and other UN agencies, academia, civil society organizations (CSOs), industry and investors), and that it would reflect the latest thinking and practices related to the private sector's role in nutrition. It also conceived the concept of an Index for 'spotlight countries' to reflect on how the local legal / regulatory and business context could help each country address its specific nutrition challenges. ATNI was established as an independent, not-for-profit organization in 2013 to design and publish Global and Spotlight Indexes and develop other private sector accountability mechanisms.

More information about ATNI's Indexes, including methodology documents from previous Global Indexes and country Spotlight Indexes, is available on the [ATNI website](#).

Purpose and Theory of Change behind ATNI's Indexes

Purpose

The Indexes that ATNI publishes are modelled primarily on the types of benchmarks developed for or by the investment and finance community. ATNI's purpose is to develop and deliver tools that:

- Track the contribution of the F&B industry to address the interrelated global nutrition challenges of undernutrition, micro-nutrient deficiencies, overweight and obesity and all diet-related diseases; and
- Can be used by stakeholders to hold companies to account for delivering their commitments to tackle these challenges.

The Global Index — ATNI's flagship report — is a unique private sector accountability tool that tracks, scores and ranks the world's largest F&B manufacturers. By comparing scores from one Index to the next, the companies themselves, their investors and other stakeholders, can see whether and how their performance has improved over time. The ultimate aim is to encourage these companies to do as much as they can to improve the diets of adults and children around the world.

ATNI's Indexes and related activities are guided and informed by the design principles (see [Figure 1](#)) that stem from desk research, ATNI's Theory of Change (see [Figure 3, page 9](#)), extensive stakeholder consultations and input from advisors and experts.



Key design principles that guide ATNI Indexes

1. Base the assessment methodologies on prevailing international and national standards, norms and established best practices where possible

ATNI Indexes aim to reflect the existing consensus on best practice, not to define such practices. Prevailing international and national standards, norms and established best practices form the starting point of the methodology. The Index does not assess compliance with regulations or law, which is the role of governments, but rather assesses the degree to which companies voluntarily align their policies, practices and products to international standards, norms and best practices.

2. Recognize current state of knowledge and continually evolve

To maintain alignment with evolving knowledge and practices about diets, nutrition and health, Index methodologies are revised at regular intervals while striving to retain comparability over time.

3. Ensure relevance and applicability to a range of company types

The ATNI methodologies are designed to evaluate the degree to which core business activities such as product formulation, marketing, distribution and product labeling embed nutrition considerations. This type of assessment is relevant to a variety of company ownership types (i.e. publicly listed and privately owned), as well as companies with different product portfolios (primarily food, primarily beverages, or a mix of both).

4. Identify, reward and spread good practice

Access to Nutrition Indexes aim to generate 'healthy competition' among the ranked companies to encourage them to do better in each future Index iteration, thereby demonstrating their increasing contribution to addressing global nutrition challenges. They are not intended to be 'name and shame' exercises. The Corporate Profile therefore awards credit for good practice beyond minimum legal standards. The Product Profile aims to highlight which companies have the healthiest portfolios and the healthiest products within categories, to stimulate them to improve their products and increase their contribution to public health.

5. Encourage transparency as well as good practice

The ATNI Indexes award credit to companies not only for their policies and practices, but also for the level and quality of their public reporting. High levels of transparency allow other stakeholders to better understand the extent to which companies are addressing nutrition issues, and to engage with them about their approach and effectiveness.

6. Utilize an inclusive approach, incorporating multi-stakeholder input

As noted, input from relevant stakeholder groups – including policymakers, experts, non-governmental organizations and industry – was sought throughout the original methodology development process and subsequent revisions. This approach is taken to develop each iteration of the Global Index methodology, and Spotlight Index methodologies.

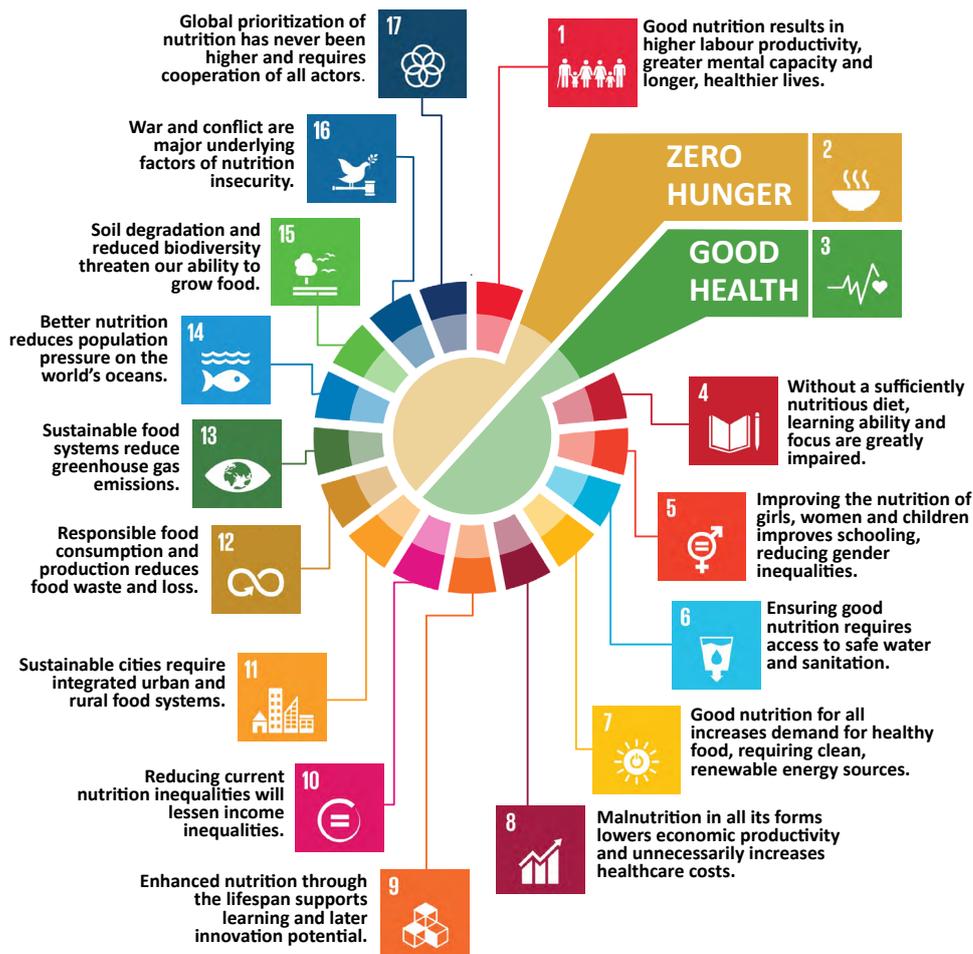
ATNI's Theory of Change

ATNI aims to contribute to the global effort to achieve the UN 2030 [Sustainable Development Goals](#) (SDGs) and the 2025 WHA Global Nutrition Targets. As indicated within the context of the UN Decade of Action on Nutrition and shown in Figure 2, good nutrition plays a central role in many of the SDGs.⁸

Figure 2
Nutrition and the SDGs

NUTRITION AND THE SDGs

CENTRAL TO THE 2030 AGENDA



UNITED NATIONS DECADE OF
ACTION ON NUTRITION
2016-2025

Source: WHO Department of Nutrition for Health and Development, 2018

⁸ United Nations Decade of Action on Nutrition. More information available at: <https://www.who.int/nutrition/decade-of-action/en/>

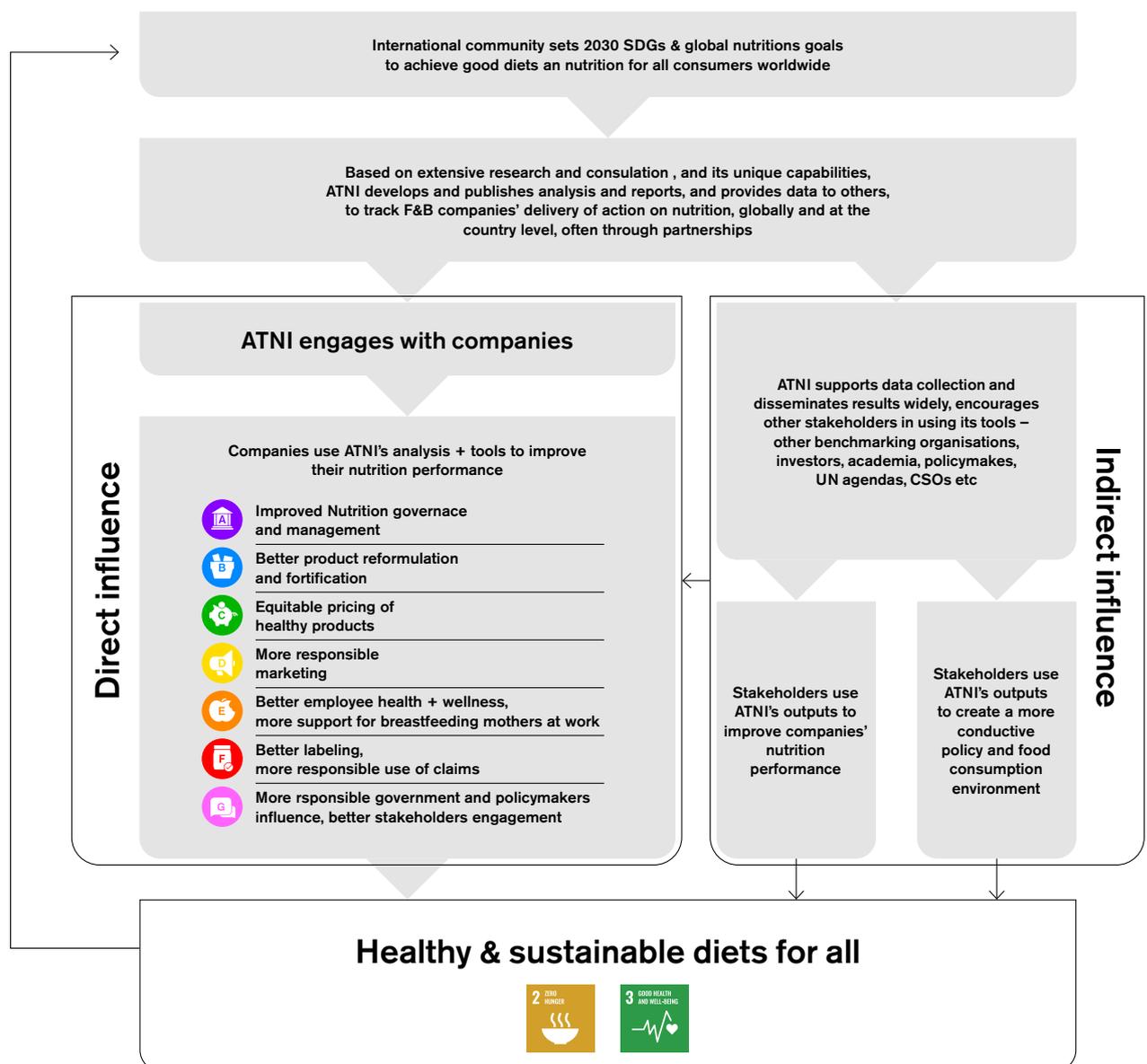


ATNI's Theory of Change (shown in Figure 3) illustrates how ATNI contributes to the SDG agenda through its activities with a predominant focus on two of the goals:

- **Goal 2:** 'End hunger, achieve food security and improved nutrition and promote sustainable agriculture'. ATNI develops its tools to monitor and drive F&B manufacturers' contributions to ending hunger and ensuring access by all people to safe, nutritious and sufficient food all year round (target 2.1); and ending all forms of malnutrition (target 2.2) by 2030; and
- **Goal 3:** 'Ensure healthy lives and promote well-being for all at all ages' also guides ATNI's work, aiming to improve access to more nutritious foods and healthier lifestyles for all, with particular attention to the needs of newborns and children, as well as priority populations (a concept that is further described on [page 16](#), below).

Figure 3

ATNI's Theory of Change



Further, in support of this central focus and towards indirectly contributing to the above goals, ATNI also aims to contribute to the reduction of food loss and waste along F&B production and supply chains. This is in line with Goal 12, and a wide range of other SDGs that are dependent on good nutrition.

As ATNI's flagship tool, the Global Indexes — in concert with country-specific Spotlight Indexes and other ATNI projects and initiatives — play a central role in the way the organization drives change within the food sector. The Global Index has a comprehensive and global scope, focusing on the largest F&B manufacturers worldwide by revenues. The tool itself, and the way the research process is conducted, are vehicles for direct and extensive engagement with companies before and after publication. Furthermore, the Global Index findings and reports are used by a wide variety of other stakeholders, as mentioned, enabling them to further engage with companies in support of the overall goal to achieve healthy and sustainable diets for all.

Stakeholder consultation and expert input

Two major multi-stakeholder groups advise and guide ATNI on the Global Index — the Expert Group and the Board of Directors. To protect the independence and integrity of the Index, no executives currently employed by F&B companies are eligible to serve on either group. Members of each group serve in their personal capacities and in an advisory role only. Their work for ATNI is voluntary and unpaid.

Board of Directors: The mandate of the Board of Directors is to provide strategic guidance on the development of ATNI and all of its products. It focuses on: how to make and keep ATNI's products relevant and effective; the institutional arrangements necessary to sustain the Initiative's work over time; and on how to engage with stakeholders around the objectives and findings of the Indexes and other products. The list of Board members can be found [here](#).

Expert Group: The mandate of the ATNI Expert Group is to provide technical advice on the methodology development and to review draft Index reports prior to publication. The Expert Group comprises experts in nutrition, including obesity, undernutrition and diet-related chronic diseases among priority populations, and in the role that the F&B industry plays in nutrition and (public) health. The list of Expert Group members is included in Appendix II, and can also be found on [ATNI's website](#).

Input from ATNI's multi-stakeholder approach, advice of the Expert Group and ATNI's analysis of changes to relevant standards, guidelines and (inter)national strategies or frameworks together inform the development of the Index methodology.



Key elements of the Global Index

The Corporate Profile

Companies' policies, practices and disclosure related to promoting good nutrition for all, i.e. preventing and tackling undernutrition, micronutrient deficiencies, overweight and obesity, and diet-related diseases, are assessed using the Corporate Profile methodology. The Corporate Profile scores and ranking form one of three of the main outputs of the ATNI Indexes. They reflect the efforts that companies have made to: incorporate nutrition into their overall corporate strategy and their governance and management systems; improve the nutritional quality of their product portfolios and develop new healthy products; improve their pricing and distribution of healthy products; support consumers to eat a healthy diet and live healthy lives; label their products effectively to help consumers choose healthy options; market their products responsibly, and; engage with policymakers and their stakeholders.

The Corporate Profile was the first Index element developed by ATNI. In 2018, the Product Profile was added to the Global Index for the first time, and has now been integrated into the Corporate Profile methodology. The basic structure of the 2021 methodology has not been modified from the 2013, 2016 and 2018 Global Indexes, and is organized into Sections, Categories, Criteria and Indicators:

- **Sections:** There are three sections, which reflect distinct types of corporate activity: i) Nutrition governance and management ii) Formulating and delivering appropriate, affordable, accessible products; iii) Influencing consumer choice and behavior. Each section includes one or more categories.
- **Categories:** ATNI's thematic areas that capture companies' nutrition-related practices and efforts are assessed in the seven categories (A-G). Within each category are sub-categories called criteria. All categories and criteria are listed in Table 1 ([page 15](#)).
- **Criteria:** The criteria are more detailed and are nested within the categories. Within the criteria are indicators of corporate activity.
- **Indicators:** There are three types of indicators or 'units' of information on which companies are scored; commitments, performance and disclosure. Weighting of the indicator scores is applied at various levels. The performance indicators, for example, have double the weight of the commitment and disclosure indicators.

Many details have changed since previous Global Indexes. An overview of the sections, categories and criteria is provided in Table 1 ([page 15](#)) and the complete Corporate Profile methodology including all indicators is presented in Appendix I.

The Product Profile

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios in several markets undertaken by analyzing the levels of fat, salt, sugar, fruit, vegetables, and other components within individual products. The results are assessed in three ways: i) an analysis of the healthiness of the companies' overall product portfolios; ii) an analysis of companies' performance compared to peer companies within the same product categories, and; iii) an analysis of how the healthiness of the product portfolio has changed since the previous Index. The Product Profile in the Global Index 2018 generated baseline data that enables the measurement of improvements over time. This trend analysis has been introduced in the scoring of the Product Profile for those companies that have been assessed in 2018 and in 2020, comparing the outcomes for those countries/markets that are covered at both time points.

The proportion of healthy products as well as estimated category- and portfolio-level sales derived from healthy products for each company are also being monitored through the Product Profile. While the 2018 Product Profile was presented as a separate score and ranking, it has been integrated into the Corporate Profile scores and ranking for the Global Index 2021.



To determine products' nutritional quality, ATNI uses Nutrient Profiling Systems (NPS)⁹ that meet qualitative criteria as defined by ATNI's Expert Group. According to these criteria, an NPS should:¹⁰

- Be developed with appropriate stakeholder consultation;
- Cover the majority of categories of processed F&B products;
- Take into account both positive and negative nutrients;
- Not have been designed solely to address school foods but to assess foods in the general market;
- Be well-validated with results published in the peer-reviewed literature demonstrating that the models produce internally consistent classifications of 'healthy' and 'unhealthy' foods, consistent with general nutrition principles;
- Enable differentiation of nutritional quality within and between categories;
- Be available in the public domain, including the algorithm, so as to be able to access and apply it;
- Be able to generate meaningful results across all countries.

ATNI uses two NPS that meet these criteria:

- The **Health Star Rating** (HSR) NPS was initially developed for use in Australia and New Zealand, but is applicable to any market to determine how healthy each product is. Products are rated between 0.5 stars (least healthy) to 5 stars (most healthy). Based on Australian research, any product that scores 3.5 or above is considered by ATNI to be healthy.¹¹ The results from the HSR analysis are used to generate each company's Product Profile score.
- The **WHO Regional Nutrient Profile Models** that identify which products are suitable to be marketed to children. Regional nutrient profile models currently exist for the WHO EURO, WHO SEAR, WHO EMRO, WHO WPR, WHO ARCO and WHO PAHO regional offices.¹² Analysis is presented of companies' products' suitability to market to children, according to these models, but the results are not included in the Product Profile score.

The Product Profile methodology was initially developed in partnership with Mike Rayner, a Professor at the University of Oxford (and member of ATNI's Expert Group), and more recently with the Food Policy Division of The George Institute (TGI) for Global Health. A detailed description of the methodology, as applied to the Global Index 2018, can be accessed [here](#).

The Product Profile methodology for the Global Index 2021 will be applied according to the same principles as the Global Index 2018, but with two main changes. Three scored elements are taken into account instead of one, which are explained in the section 'Product Profile score' ([page 25](#)) below. Secondly, the WHO Regional Nutrient Profile Models are used to assess which products are suitable to be marketed to children in the selected markets. For the Global Index 2018, the WHO EURO model was applied for this unscored element of the Product Profile.

BMS / CF Marketing assessment

ATNI Indexes include an assessment of the marketing practices of major baby food companies, presented in the BMS / CF Marketing sub-ranking. This element of the methodology assesses whether the world's largest BMS manufacturers' marketing policies are in full compliance with the International Code of Marketing of BMS and subsequent relevant WHA resolutions, and whether they have management systems in place to ensure proper implementation of those policies across their businesses. It also assesses whether companies have clear objectives, policies and

⁹ Nutrient profiling is "The science of classifying or ranking foods according to their nutritional composition for reasons related to preventing disease and promoting health." More information: <http://www.who.int/nutrition/topics/profiling/en/>

¹⁰ A catalogue developed for the World Health Organization in 2011 was reviewed and updated for the Product Profile in the Global Index 2018. The two selected models were selected from the 67 models included in the updated catalogue (prepared by Professor Mike Rayner of the University of Oxford: Nutrient profiling: catalogue of nutrient profile models). For the Global Index 2021, more recent information was considered, including a recent overview that included information from the WHO catalogue, but the selection of NPS remained unchanged. Reference: Labonté, M., Poon, T., Gladanac, B., Ahmed, M., Franco-Arellano, B., Rayner, M. and L'Abbé, M., 2018. Nutrient Profile Models with Applications in Government-Led Nutrition Policies Aimed at Health Promotion and Noncommunicable Disease Prevention: A Systematic Review. *Advances in Nutrition*, 9(6), pp.741-788.

¹¹ The threshold of 3.5 or above (≥ 3.5 HSR) is based on work commissioned by the New South Wales Ministry of Health in Australia, which concluded that "healthy core foods with a HSR of ≥ 3.5 can be confidently promoted in public settings as healthier choices." Reference: Dunford E, Cobcroft M, Thomas M, Wu JH. Technical Report: Alignment of the NSW Health Food Provision Policy with the Health Star Rating System. Sydney, NSW: NSW Ministry of Health; 2015. Available at <http://www.health.nsw.gov.au/health/Publications/health-star-rating-system.pdf>

¹² WHO ARCO: Regional Office for Africa ; WHO PAHO: Regional Office for the Americas; WHO SEAR: Regional Office for South-East Asia; WHO EURO: Regional Office for Europe ; WHO EMRO: Regional Office for the Eastern Mediterranean; WHO WPR: Regional Office for the Western Pacific



management systems to guide their lobbying activities related to BMS and whether they disclose their policies, information about their governance and management systems, auditors' reports, position statements and other relevant documentation. The methodology used for such assessments is available [here](#). The 2021 Global Index BMS / CF Marketing sub-ranking will include the world's 10 largest BMS producers.

Scope

The food and nutrition value chain is complex and varied, including a range of actors from farmers and agricultural companies, to traders, manufacturers, retailers, café and restaurant chains, and food service companies. Although ATNI recognizes all levels and value chain actors are critical for delivering healthy and sustainable foods and diets, the Global Index focuses on the F&B manufacturers that produce packaged food and beverages.

ATNI's thematic approach is centered on assessing F&B companies' commitments, performance and disclosure practices related to all forms of malnutrition. The 2021 methodology has been adapted to specifically address the nutritional needs of priority populations (a concept that is further described on [pages 16-18](#)), which replaces the separate 'Nutrition' and 'Undernutrition' elements as applied in the 2018 and prior Global Indexes.

Outside the scope of the Global Index

Companies' practices, products and issues that are outside the scope of the Global Index 2021, and are therefore excluded from ATNI's analysis, include:

Sports and medical nutrition products

The Global Index is not designed to account for companies' activities targeting people with special nutritional or dietary needs, such as athletes and people whose dietary requirements are supervised by healthcare professionals. However, sports and energy drinks that are sold through mainstream retail channels and which are commonly used as normal beverages are included in ATNI's analysis.

Products that are a part of a formal weight management program

If companies rated by the Indexes sell products that are intended to be a part of (or are marketed / branded in association with) a formal weight management program, their activities related to these products are not included in the Global Index, as there is currently no international consensus on the appropriate nutritional standards for such products.

Practices related to legal compliance

The Global Index does not assess companies' compliance with national and international regulations or law. It is the responsibility of individual companies to ensure compliance with all applicable laws and regulations, and the role of governments is to monitor their compliance with them.

Issues not related to nutrition and health

The following social and environmental impacts of F&B companies fall largely outside of the scope of the Global Index:

Food safety¹³

- Water management practices
- Environmental sustainability, including sourcing of ingredients¹⁴
- Contribution to climate change
- Fair treatment of workers and communities¹⁵
- Crop breeding (e.g. hybridization and genetic modification)

¹³ For the India Spotlight Indexes, due to the specific local relevance and importance, indicators related to food safety are included in ATNI's methodology.

¹⁴ Other than in relation to food loss and waste.

¹⁵ Other than workforce (and supply chain) nutrition elements in Criteria E1, and a single indicator that addresses adherence to international codes of conduct related to responsible interaction with stakeholders in the food supply chain (Criteria G2, indicator 4).



Global Index 2021: specific aim, development and new features

Specific aim of the Global Index

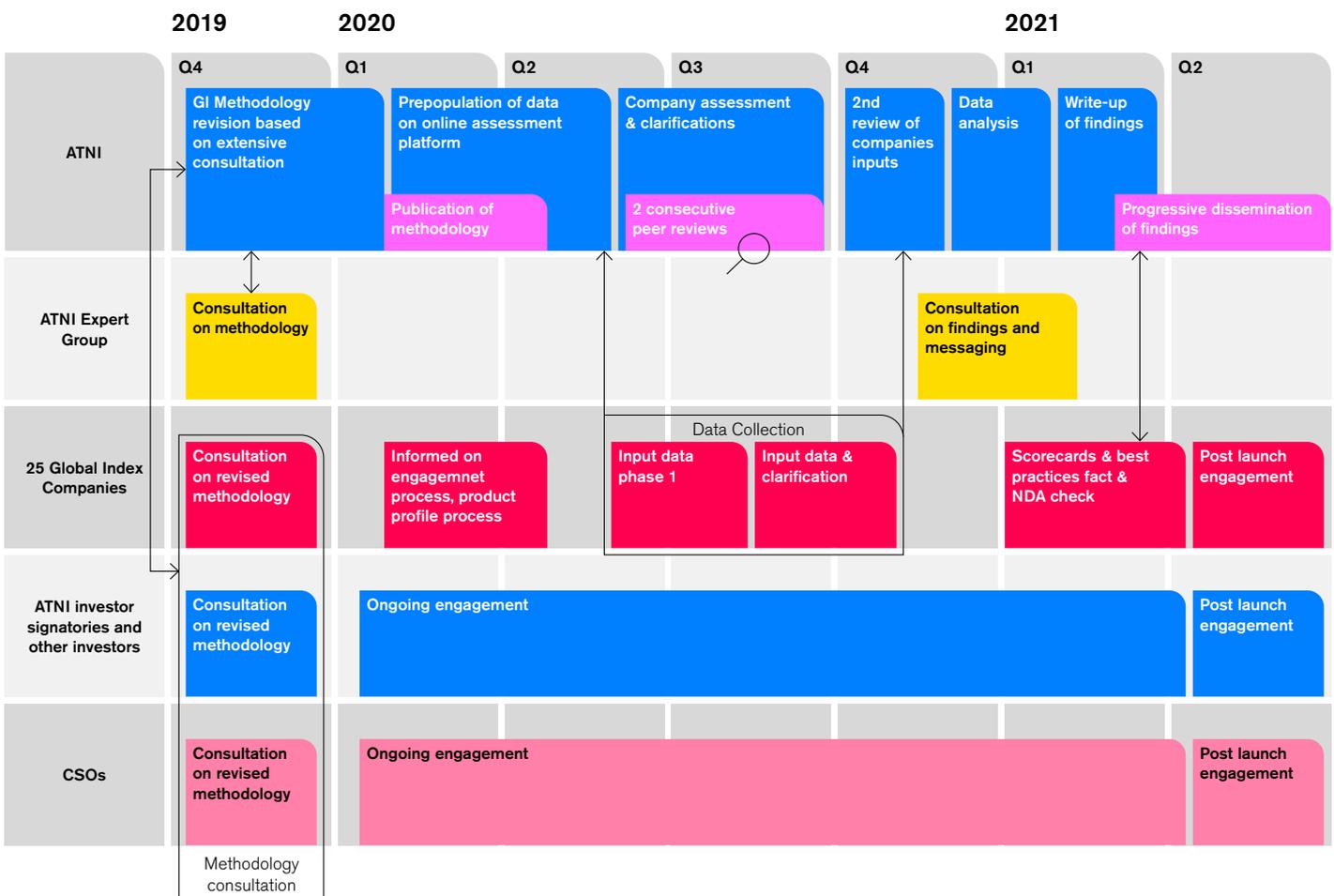
Aligned with the purpose of ATNI's Indexes as described on page 6, the specific purpose of publishing the Global Index 2021 is to encourage companies to increase consumers' access to nutritious products and responsibly exercise their influence on consumers' choice and behavior. The Global Index 2021 builds on the previous Global Indexes from 2013, 2016 and 2018 to:

- Track the contribution of the largest F&B manufacturers to address overweight and obesity, diet-related diseases, food insecurity, undernutrition and micronutrient deficiencies at a global level;
- Enable investors and other stakeholders to hold companies accountable for fulfilling their commitments to help tackle these global nutrition challenges, and;
- Highlight new developments, and describe and share best practices of front-running companies on nutrition-related topics.

Development of the Global Index 2021

ATNI organizes multi-stakeholder consultations for companies, investors and CSOs, after each iteration of its Indexes. Consistent with this approach, ATNI has adapted the 2021 methodology based on stakeholder input received after the publication of the Global Index 2018 and finalized it with the advice from ATNI's Expert Group. The planned research and engagement process, including the dissemination of results, is shown in Figure 5.

Figure 5
ATNI Index methodology development: engagement process with stakeholders



Key changes from previous indexes

As noted, while the structure of the methodology for the Global Index 2021 has not changed, several adjustments have been made compared to the previous iterations of the Global Index. These are explained further in the following paragraphs.

Integration of the Product Profile

In 2018, the Corporate Profile and Product Profile were presented as separate outputs and with different scores and rankings. In the process of revising the methodology, ATNI has decided to integrate the Product Profile results into Category B of the Corporate Profile in order to present one overall Index ranking. For the Global Index 2021, the Product Profile will carry 20% of the overall Index weight, and is incorporated as one of the criteria in Category B. The overview of the categories and criteria in the Global Index 2021, and the weights, are shown below in Table 1. The weights of the categories are distributed evenly across the criteria, except for Category B.

Table 1

Global Index Corporate Profile methodology overview

Category (weight in total score)	Description	Criteria*
Section 1: Nutrition governance and management		
A Governance (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 Products (35%)	Formulating appropriate products	B1 Product profile results (20%) B2 Product formulation (7.5%) B3 Defining healthy and appropriate products (7.5%)
C Accessibility (15%)	Delivering affordable, accessible products	C1 Product pricing C2 Product distribution
Section 3: Influencing consumer choice and behavior		
D Marketing (20%)	Responsible marketing policies and auditing of compliance	D1 Marketing policy: general aspects of responsible marketing D2 Marketing policy: specific arrangements regarding responsible marketing to children and teens D3 Auditing and compliance with policy
E Lifestyles (2.5%)	Supporting healthy diets and active lifestyles	E1 Supporting employee health & wellness E2 Supporting breastfeeding mothers at work E3 Supporting community-supporting healthy eating and active lifestyle programs
F Labeling (10%)	Product labeling and use of health and nutrition claims	F1 Product labeling F2 Health and nutrition claims
G Engagement (5%)	Influencing governments and policymakers, and stakeholder engagement	G1 Lobbying and influencing governments and policymakers G2 Stakeholder engagement and partnerships

*Note: The category weight is equally distributed over criteria except for category B where Product Profile results carry a higher weight.



Reduction of indicator numbers

ATNI has made an effort to reduce the number of indicators to be more efficient in assessing and engaging with companies. For example, the structure of Category D (responsible marketing) has been changed to reduce the number of criteria (from four in 2018 to three in 2021) and overall number of indicators within the category.

Table 2

Comparison of the number of indicators in the 2018 and 2021 Global Index Corporate Profile methodology

	Global Index 2018			Global Index 2021		
	Total n. indicators	Total n. of scored indicators	Total n. of non-scored indicators	Total n. indicators	Total n. of scored indicators	Total n. of non-scored indicators
Category A	43	38	5	24	24	0
Category B	48+52*	40+52*	8	34	33	1
Category C	26	20	6	14	14	0
Category D	34	32	2	27	26	1
Category E	34	27	7	18	18	0
Category F	20	19	1	18	18	0
Category G	13	12	1	15	15	0
Total	270	240	30	150	148	2

*Note: a set of 13 product reformulation-related indicators were assessed separately for up to five product categories in 2018, depending on the company portfolio, resulting in up to 52 indicators. This approach is not applied in the 2021 Global Index to reduce the number of indicators and because product category-specific analysis is now part of the Product Profile analysis.

Integration of nutrition and undernutrition rankings and scores

In contrast to assessing companies' approaches to undernutrition through a separate section and with specific indicators in 2018, this Index methodology reverts to integrating and assessing companies' commitments, policies and practices related to undernutrition and micronutrient deficiencies, as well as overweight / obesity and diet-related challenges in each category. The concept of priority populations has been developed to help bridge the challenges associated with the different forms of malnutrition throughout the methodology.

Simplified scoring system

The scoring system of the Corporate Profile has been updated and simplified to make it easier to understand and improve the quality control processes related to the automated scoring system of ATNI's online data gathering platform. The number of weighting steps have been reduced in two ways: firstly, due to the integration of nutrition and undernutrition indicators and, secondly, due to replacing the weighting of commitment (25%), performance (50%) and disclosure (25%) indicators by allocating a maximum of 10, 20 and 10 points to these types of indicators, respectively, to achieve the same goal. Furthermore, additional changes have been implemented related to the integration of the Product Profile. Details of the scoring system are explained in 'The Corporate Profile score' (page 24).

Priority populations

In the Global Index 2018, company actions to prevent and address undernutrition among at-risk populations in low-income countries were assessed through a specific set of 'Undernutrition' indicators. These indicators were not applied to companies that derived less than 5% of their F&B revenues from non-OECD markets. In the Global Index 2021 methodology, the commitment of companies to specifically address the needs and key nutritional priorities of specific population groups at risk of malnutrition is assessed across low-, middle- and high-income countries. As a result, how comprehensively a company addresses all forms of malnutrition is based on the company's market presence and the specific nutrition issues in those markets.



Specifically, the Index assesses whether companies commit to addressing the needs of those groups experiencing or at higher risk of experiencing malnutrition than the general population, as defined by public authorities in the markets they are present in, and as relevant to their product portfolios and activities. All aspects of malnutrition are considered relevant if identified as a priority by public health authorities, and may encompass undernutrition, micronutrient deficiencies and overweight, obesity and diet-related diseases. Further, (risk of) malnutrition may be related to or overlap with aspects of food insecurity, defined as the uncertainties people face about their ability to obtain food and the need to reduce, at times during the year, the quality and / or quantity of food they consume due to lack of money or other resources.¹⁶

To refer to these groups, ATNI uses the overarching term 'priority populations'. This term intends to capture the multiple layers of marginalization that may shape peoples' lives, which, in turn, can result in them experiencing (or heightening their risk of experiencing) malnutrition at higher rates than the general population. Throughout ATNI's methodology, the use of this term focuses on addressing nutrition priorities in a given environment. Several factors or determinants are potentially important in identifying and addressing priority populations in relation to nutrition priorities, which are addressed in the ATNI methodology as follows:

- Nutritional factors related to age or life stages (e.g. women of childbearing age, infants, young children, elderly) and undernourished groups, with a specific focus on (the risk of) micronutrient deficiencies that can be addressed by appropriate fortification or using micronutrient-rich products, ingredients or commodities (addressed in Category B). Whether the marketing of such products is adapted appropriately to the context of the target groups is assessed in Category D, in addition to a general focus on responsible marketing of products to children and youth (i.e. refraining from marketing products that do not meet relevant health guidelines to these groups);
- Income and other socioeconomic and cultural factors are addressed in Category C in relation to the affordability and accessibility of healthy products. In addition, behavioral factors are relevant in Category E to assess if consumer-oriented educational and lifestyle programs are well attuned to the target audiences, e.g. in relation to nutrition literacy;
- Physical access factors e.g. in relation to rural or urban areas in which people's regular access to healthy foods may be limited: geographical factors are addressed in Category C — Criterion C2.

These factors, which vary by market and context, should be evident in the design and nature of companies' approaches to addressing all forms of malnutrition.¹⁷ ATNI will assess how companies identify the needs of priority populations in the markets in which they operate based on national and / or international guidelines and policies. Further, ATNI aims to credit companies' strategies that are universal but are resourced and delivered to respond to the specific nutritional needs of relevant population groups in a given market and context.

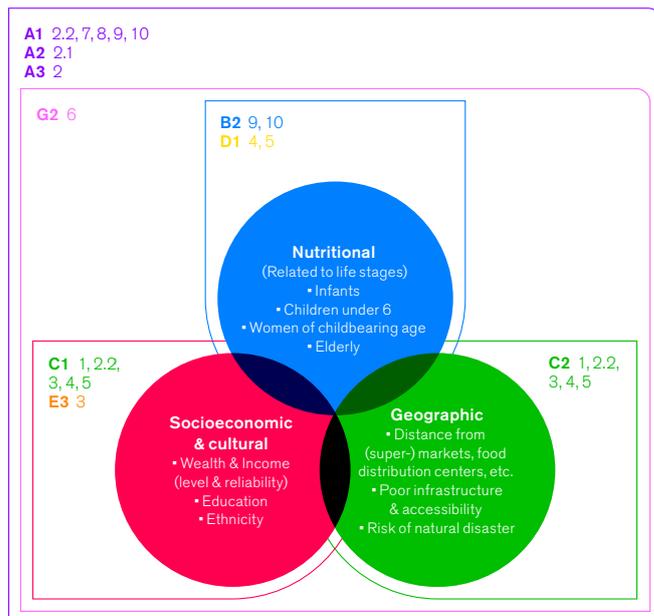
¹⁶ FAO, IFAD, UNICEF, WFP and WHO. 2019. The State of Food Security and Nutrition in the World 2019. Safeguarding against economic slowdowns and downturns. Rome, FAO, p. 5. The same report defines the inverse – food security – as "A situation that exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life." (p. 186). Based on this definition, four food security dimensions can be identified: food availability, economic and physical access to food, food utilization, and stability over time." Companies' contributions to these elements of food security are addressed throughout the ATNI methodology.

¹⁷ Such factors have been widely recognized by the international community. First, by the World Health Organization Commission, in 2008 ("Closing the gap in a generation: health equity through action on the social determinants of health. Final report of the Commission on Social determinants of Health." Available at: www.who.int/social_determinants/thecommission/finalreport/en/). This report has served as a basis for the development of the nutrition equity framework used in the 2020 Global Nutrition Report (Available at: <https://globalnutritionreport.org/reports/2020-global-nutrition-report/>). Further, in 2014, the FAO/WHO Second International Conference on Nutrition (ICN2) acknowledged that: "the root causes of and factors leading to malnutrition are complex and multidimensional:
a) poverty, underdevelopment and low socio-economic status are major contributors to malnutrition in both rural and urban areas;
b) the lack of access at all times to sufficient food, which is adequate both in quantity and quality which conforms with the beliefs, culture, traditions, dietary habits and preferences of individuals in accordance with national and international laws and obligations;
c) malnutrition is often aggravated by poor infant and young child feeding and care practices, poor sanitation and hygiene, lack of access to education, quality health systems and safe drinking water, foodborne infections and parasitic infestations, ingestion of harmful levels of contaminants due to unsafe food from production to consumption." (FAO & WHO. 2015. Second International Conference on Nutrition (ICN2). Report of the Joint FAO/WHO Secretariat on the Conference. www.fao.org/3/a-i4436e.pdf)



Figure 6

Priority populations conceptual framework and related indicator numbers



Note: Numbers refer to the indicators that refer to priority populations across the categories and criteria.

ATNI's definition of priority populations emerges from the understanding that 'unequal nutrition outcomes are rooted in deeper inequities [...] that structure everyday living conditions'.¹⁸ ATNI believes that F&B companies can and should contribute to shaping opportunities and lowering barriers to attain healthy diets, environments, and lifestyles. With this approach, ATNI chooses to focus on opportunities and processes rather than outcomes, in line with the concept of 'nutrition equity' that the 2020 Global Nutrition Report focuses on.

The factors presented in Figure 6 are also important determinants for the challenges that the SDGs aim to overcome, and should be considered in any intervention addressing food insecurity and malnutrition.¹⁹ For the SDGs and related nutrition targets to be realized, it is crucial to understand how companies can contribute to addressing the determinants of nutrition inequities. While priority populations are addressed in general in Categories A and G, specific factors are addressed in Categories B, C, D, and E.

Further strengthening of linkages to the SDGs through food loss and waste

As in previous Global Index iterations, ATNI continues to focus on the SDGs, particularly with regards to reaching [Goals 2](#) ('End hunger, achieve food security and improved nutrition and promote sustainable agriculture') and [3](#) ('Ensure healthy lives and promote well-being for all at all ages'). In this methodology, ATNI has further strengthened its emphasis on the SDGs and their realization. ATNI has incorporated indicators assessing companies' efforts in reducing the *per capita* food loss and waste along F&B production and supply chains (from the post-harvest stage to the retail and consumer levels), in line with SDG 12 (target 12.3 - "By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses"). ATNI believes that minimizing food loss and waste can make a substantial contribution to increasing access to food.

¹⁸ See 2020 Global Nutrition Report: Action on equity to end malnutrition, p. 21. Available at: <https://globalnutritionreport.org/reports/2020-global-nutrition-report/>

¹⁹ ATNI aims to guide F&B manufacturers in getting further involved in the process towards achieving the SDGs. In particular, ATNI focuses on [Goals 2](#) ("End hunger, achieve food security and improved nutrition and promote sustainable agriculture" – paying special attention to targets 2.1 and 2.2) and [3](#) ("Ensure healthy lives and promote well-being for all at all ages"). Besides, ATNI covers the environmental aspects affecting food security by incorporating indicators assessing companies' efforts in reducing food loss and waste along production and supply chains, in line with [Goal 12](#) (target 12.3). However, the latter has not been included as a factor to define priority populations. Rather, this sustainability element has been included across categories without being targeted or solely linked to these population groups.

WHO regional models and benchmarking NPS

Since the Global Index 2018, WHO has published a series of regional NPS to determine which products should not be marketed to children in relation to its worldwide efforts to reduce the exposure of children to marketing that promotes unhealthy foods and beverages. These models cover all relevant geographies and are now referred to as the relevant standard in relation to marketing to children in Category D of the Global Index 2021 methodology.

In addition, the methodology assesses whether manufacturers use a government-endorsed NPS to determine which products they define as 'healthy'. It also assesses if the company develops its own NPS customized to its business model and particular approach to product development, and if that system should be benchmarked against a well-recognized government-endorsed NPS (e.g. HSR, Nutri-Score).

Other changes

In addition to the changes above, other amendments to the Global Index 2021 methodology relate to new or updated standards or global guidelines, text edits to indicators and the provision of more detailed explanations about the scope and interpretation of indicators by providing 'additional information' sections.



Research process

The research process starts with company selection. This section describes how it is done, as well as the procedures for data collection for the Corporate Profile, the Product Profile and the BMS / CF Marketing elements.

Further, it explains the scoring algorithm of the Corporate Profile, including the Product Profile, and the BMS / CF Marketing score that is incorporated into the final Global Index score and ranking. Finally, it describes ATNI's approach to quality assurance to ensure accuracy and validity of the results.

Company selection

Criteria for company selection

ATNI's Global Indexes rank the world's largest food and non-alcoholic beverage manufacturers, including companies that are publicly listed, privately owned or cooperatives. The Global Index 2021 company selection identifies the 25 largest F&B manufacturers by total global financial year (FY) revenues, consisting of the top 20 companies, plus those companies that were included in earlier Global Indexes.

Company selection for inclusion in the Global Index 2021 was based on two sets of data: companies' publicly reported and self-reported sales revenues for the FY 2018, complemented with estimated retail sales of packaged food and (non-alcoholic) beverage products worldwide (obtained from ATNI's data service provider) for the same year.

Global Index 2021: companies selected

Table 3 lists the 25 largest F&B manufacturers selected for the Global Index 2021 assessment. These companies have the greatest impact among processed food producers on consumers' diets across different markets.

Table 3

Global Index 2021: companies selected, listed alphabetically

Company	Headquarters	Ownership type (i.e. publicly listed, privately owned or cooperative)
Ajinomoto Group	Japan	Public
Arla Foods amba	Denmark	Cooperative
BRF S.A.	Brazil	Public
Campbell Soup Company	USA	Public
China Mengniu Dairy Co.	China	Public
ConAgra Brands	USA	Public
Danone	France	Public
Ferrero Group	Italy	Private
General Mills, Inc.	USA	Public
Groupe Lactalis S.A.	France	Private
Grupo Bimbo, S.A.B de C.V.	Mexico	Public
Inner Mongolia Yili Industrial Group	China	Public
Kellogg Company	USA	Public
Keurig Dr Pepper	USA	Public
Royal FrieslandCampina	Netherlands	Cooperative
Mars, Inc.	USA	Private
Meiji Holdings Co., Ltd.	Japan	Public
Mondelez International, Inc.	USA	Public
Nestlé S.A.	Switzerland	Public
PepsiCo, Inc.	USA	Public
Suntory Beverage & Food Ltd.	Japan	Public
The Coca-Cola Company	USA	Public
The Kraft Heinz Company	USA	Public
Tingyi Cayman Islands Holding	China	Public
Unilever	UK/Netherlands	Public

Among the 25 are three companies that have not been included in previous editions – the two Chinese companies, Inner Mongolia Yili and China Mengniu Dairy Co., and Keurig Dr Pepper (Dr Pepper Snapple Group, a predecessor of the current business entity that had already been assessed for *The U.S. Spotlight Index 2018*). Together, all 25 companies accounted for approximately 24% of the processed F&B market share in the world in 2018. Their combined 2018 F&B sales were estimated to be over \$720 billion.²⁰

Most manufacturers sell a wide range of F&B products. Six are primarily dairy and/or baby food producers (FrieslandCampina, Lactalis, Arla, China Mengniu, Danone and Inner Mongolia Yili); three are predominantly confectionery companies (Ferrero, Mars, Mondelez); and three produce mostly beverages (Coca-Cola, Suntory and Keurig Dr Pepper). The companies also differ in ownership type and include publicly traded companies, privately held companies and cooperatives - as shown in Table 3.

²⁰ Data extracted from Euromonitor International's 2018 industry publications of Packaged Food, Hot Drinks and Soft Drinks.



Research procedures

Corporate Profile procedure

ATNI collects data through an iterative, consultative process with the companies that are assessed. Companies are invited to engage on a voluntary and cost-free basis (to ensure the independence of the Index), to provide information (including non-publicly available data) and clarification. They are offered the option of entering into a Non-Disclosure Agreement (NDA) with ATNI, which facilitates the exchange of information that is not publicly available.

ATNI research analysts gather public information from corporate websites and third-party sources referred to by companies. All of this information and source documents are saved on an online data gathering platform. A dedicated ATNI analyst makes a preliminary assessment of that information against the methodology. Companies are provided access to the platform and offered training on how to use it. They may comment on ATNI's initial assessment and provide additional relevant information via the platform — under an NDA if desired. This information, provided it is sufficiently supported with evidence, is accepted by ATNI to assess their commitment and performance only; companies can only achieve scores for disclosure based on published information. After re-assessment of the data by ATNI, companies are asked to clarify and / or provide additional evidence through the platform. New information and source documents are accepted if published before the deadline of 29 September 2020.

Product Profile procedure

ATNI and The George Institute for Global Health (TGI),²¹ with additional data input from Innova Market Insights,²² work in partnership to generate the Product Profile, which involves the following procedures:

- **Country selection:** The 2018 Product Profile assessed the nutritional quality of the products of the Index companies in nine markets (Australia, China, Hong Kong, India, Mexico, New Zealand, South Africa, the U.K. and the U.S.). To ensure that the 2021 results are comparable across companies and based on an analysis of the countries that contribute most to their estimated global retail sales, the selection of markets for the Product Profile starts with this list of countries covered in 2018 and adds additional important markets not already covered. Six major regional markets (Brazil, Canada, France, Germany, Japan and Russia) are prioritized to ensure optimal comparability between companies, but additional countries are included as necessary according to their global presence. For each company, up to a total of 10 countries are included in the Product Profile with the aim of covering 80% of their estimated global retail sales, and with a minimum of 50%, based on the cumulative country-level retail sales. Data from the FY 2018 was used as a basis for the analysis.
- **Food category selection:** ATNI identifies the product categories for each company using the FY 2018 retail sales data.²³ All packaged foods and non-alcoholic beverages manufactured and marketed by the included companies' are included in the analyses, other than those identified under 'Outside the scope of the Global Index'.²⁴ Up to five best-selling product categories for each company, per country, are identified based on retail sales value and included in the analysis, to cover those products that make a large contribution to diets in those countries.
- **Nutrient content data:** Nutrient content information, which is extracted from the label information on the product packaging, is compiled into a database from two sources: TGI's FoodSwitch databases in the nine countries assessed in 2018, and the Innova Market Insights database for all countries covered, to ensure the dataset used for the Product Profile is comprehensive and contains the most up-to-date information. Products with data entered or updated from 2018 onwards are used to generate product lists for each company, using the most recent data if the same product is listed multiple times.

²¹ ATNI commissions TGI to undertake the Product Profile research. TGI's flagship FoodSwitch program is a growing database of nutrition and labelling information with over 500,000 packaged and restaurant foods. TGI has previously used their database to analyze the healthiness of the food supply of more than 1 billion people around the world. TGI follows its standard rigorous research and validation processes for the Product Profile. For a detailed account about the background and calculation, please refer to [TGI's 2018 Product Profile report](#)

²² Innova Market Insight is a market research company that tracks new F&B product launches in more than 75 countries. More information available at: <https://www.innovamarketinsights.com/>

²³ Data extracted from Euromonitor International's 2020 industry publications of; Packaged Food, Hot Drinks and Soft Drinks.

²⁴ So-called 'private label' products, which may be manufactured by companies included in ATNI's analysis but are marketed and sold by other parties under different brand names, are not included in the analysis.



- **Nutrient content data confirmation:** All included companies are provided with their product lists and nutrient content for all included countries and are offered the opportunity to provide corrections or additions, which will be used to update the product database before starting the data analysis.

BMS / CF procedure

The BMS / CF Marketing methodology is designed to evaluate whether baby food manufacturers market their BMS and CF products in line with the following key international guidelines and standards in this area:

- The International Code of Marketing of Breast-milk Substitutes (1981);
- Subsequent WHA resolutions that make significant additions or provide clarifications to the original Code, referred to throughout this document in appropriate sections;
- Codex Alimentarius Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (Codex Standard 72-1981), Codex standard for Follow-up Formula (Codex Standard 156-1987), and Codex Alimentarius Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CAC / RCP 66-2008);
- WHO / the Food and Agriculture Organization of the United Nations (FAO) Guidelines on Safe Preparation, Storage and Handling of Powdered Infant Formula (2007);
- Relevant local regulations in the countries in which ATNI conducts in-country studies.

The Indexes assess whether companies market the following BMS / CF products in line with the recommendations of The Code:

- CF identified as being suitable for infants from 6 to 36 months of age;
- Any type of milk-based formula, including: infant formula (that can satisfy the normal nutritional requirements of infants up to six months of age); follow-on formula, also called follow-up formula (for infants from six months of age); and growing-up milk, also called toddler milk (for young children from 12 to 36 months of age).

The 2018 Global Index did not assess whether companies had adopted the recommendations of WHA resolution 69.9 passed in 2016, which extends The Code's application to infant formula marketing as suitable for young children up to 36 months of age, and makes new recommendations on the marketing of CF for infants from 6 to 36 months of age. This was to give companies time to implement those recommendations. ATNI has incorporated WHA 69.9 recommendations into this methodology for the Global Index 2021.²⁵

The assessment is undertaken using two separate tools: the BMS / CF 1 Corporate Profile assessment, and the BMS / CF 2 in-country assessment.

BMS / CF 1 Corporate Profile assessment

The BMS 1 Corporate Profile methodology has two modules, designed to measure the extent to which BMS companies' marketing policies align to The Code and resolution WHA 69.9. Both the BMS and CF modules measure whether companies have comprehensive, effective procedures and management systems to implement their policies, as well as their level of transparency. The 10 largest BMS and CF manufacturers are included in the sub-ranking for the Global Index 2021, based on their FY 2018 global revenues.²⁶ These are (listed in alphabetical order):

- Abbott Laboratories Inc. (included in 2016 and 2018 sub-ranking);
- China Mengniu Dairy Co. (new);
- Danone (included in 2016 and 2018 sub-ranking);
- Feihe International Inc. (new);
- Inner Mongolia Yili Industrial Group (new);
- The Kraft Heinz Company (included in 2016 and 2018 sub-ranking);
- Nestlé S.A. (included in 2016 and 2018 sub-ranking);
- PepsiCo, Inc. (new);
- RB (included in 2016 and 2018 sub-ranking);
- Koninklijke FrieslandCampina (included in 2016 and 2018 sub-ranking).

²⁵ Further, because The Code encompasses products for special medical or dietary use, these products are also assessed in both BMS 1 and BMS 2.

²⁶ Data extracted from Euromonitor International's 2020 industry publications of Packaged Food.



As per the process for the standard Global Index Corporate Profile methodology described above, the publicly available BMS and CF marketing policies of each of the 10 baby food companies are first reviewed to determine the extent to which they align with The Code. ATNI collects information through an iterative, consultative process with the assessed companies. Companies are invited to engage on a voluntary and cost-free basis, and are offered to enter into an NDA with ATNI.

BMS / CF 2 in-country assessments

In-country assessments are designed to measure companies' compliance with The Code and / or national regulations — whichever is stricter. These assessments cover all forms of marketing, as set out in The Code, by interviewing mothers and healthcare workers, visiting retail stores and online retailers, as well as monitoring traditional and digital media. Countries are selected based on a risk rating system used by FTSE4Good based on data relating to the child mortality rate, level of malnutrition, HIV rates, corruption levels, the Human Development Index score, status of implementation of The Code, and other factors ²⁷. For the BMS / CF 2 assessment, all companies — local or multinational — whose products are found in the territory are included in the study.

Global Index 2021 approach to scoring and ranking

The Corporate Profile score

The Corporate Profile score is calculated using the sequential steps as illustrated in Figure 7 below.

Indicator level: Indicators are closed questions, and the basic 'units' of information, each of which assesses a specific aspect of the company's activity. Three types of activity are measured: the companies' commitments, performance and disclosure.

The maximum score for performance indicators is 20, but for commitment and disclosure indicators the maximum is 10, to ensure that indicators that assess what companies put in practice have double the influence on the final scoring compared to commitment and disclosure indicators. Indicators have a number of scoring options and a fixed maximum score. Some are organized on a sliding scale with the top level receiving a score of 10 (or 20) and lower levels being awarded lower scores on a standardized scale of 5 (or 10), 2.5 (or 5) and 0, typically. Other indicators are scored using multiple, equally valid options. In this case, each answer carries an equal number of points that are totaled for the indicator score.

Lastly, two multipliers are applied to indicators that assess companies' commitments, performance and disclosure related to 'healthy' foods and 'geographic' factors:

 **Healthy multiplier:** ATNI aims to give a higher score to companies that use a rigorous definition of 'healthy products'. It therefore awards a healthy multiplier based on the score in B3, which assesses the quality of a company's NPS and the rigor of its definition of healthy products. A healthy multiplier ranges between 0.5 (i.e. reducing the score of a relevant indicator) and 1 (i.e. no effect on the score of a relevant indicator). Indicators to which the healthy multiplier is applied are identified by a heart symbol.

 **Geographic multiplier.** In order to reward companies that make and deliver commitments on a global basis, rather than on a more limited geographic basis, ATNI applies a geographic multiplier to some indicators. The scope of a company's policy or performance is in some cases multiplied (e.g. by 1 if it applies globally, by 0.75 if it applies to multiple major markets, and by 0.5 if it applies to a company's home market only). Indicators to which the geographic multiplier is applied are identified by a globe symbol.

Criterion level: The criterion score is calculated by adding the scores for all indicators within the criterion and dividing this by the total maximum score (obtained by adding the maximum of 10 points per commitment and disclosure indicator, and 20 points per performance indicator).

²⁷ For more information about FTSE4Good's risk rating system, see: https://research.ftserussell.com/products/downloads/F4G_BMS_Criteria.pdf

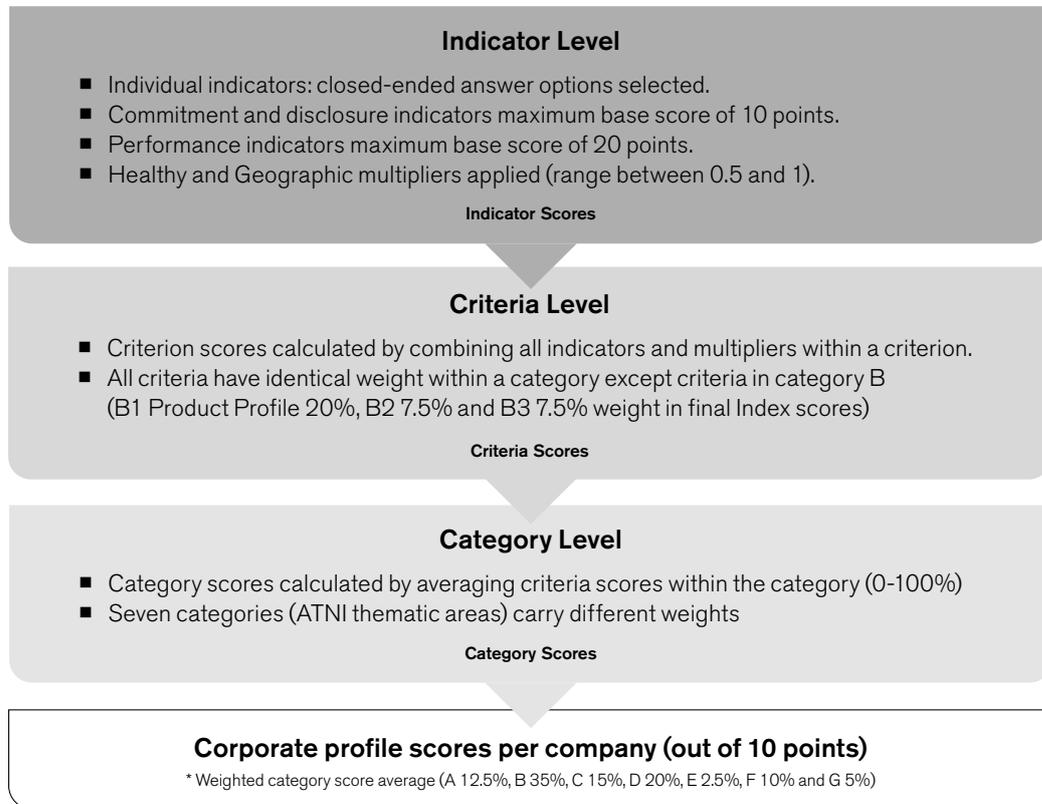


Category level: The category score is the mean of its criteria scores, except for Category B, in which the weighted mean of Criteria B1, B2 and B3 is calculated according to the respective weighting of 20%, 7.5% and 7.5% of those criteria in the overall Corporate Profile score.

Corporate Profile score: The Corporate Profile score is the weighted mean of the category scores (A 12.5%, B 35%, C 15%, D 20%, E 2.5%, F 10% and G 5%).

Figure 7

Calculation of the Corporate Profile score



The Product Profile score

The three elements of the Product Profile score are calculated and integrated into the Corporate Profile methodology in Criterion B1: Product Profile results. The steps below describe the calculation of the elements that make up the Product Profile score (see also Figure 8 below).

- Calculation of HSR:** The HSR is first calculated for each unique product. A food or beverage is considered as a unique item based upon the brand name and description irrespective of serving size and packaging (i.e. a specific brand of cola sold in 7.5 fl oz cans is considered the same as the same specific brand of cola sold in 12 fl oz bottles). A mean HSR for the category is determined by adding up the HSRs for each unique product in the category and dividing the sum by the number of products in the category. Mean HSR scores are calculated for all included categories within each of the included countries for the assessment.
- Healthiness score (sales-weighted mean HSR score):** To generate each company's sales-weighted mean HSR score, first, the mean HSR per country is calculated as the sales-weighted mean of the product categories according to the corresponding category retail sales values.²⁸ Secondly, the overall sales-weighted mean HSR score is calculated as the sales-weighted mean of all included countries. The highest possible score on the HSR and for this initial calculation is five. The score is doubled to obtain a score out of 10. In addition to the sales-weighted mean HSR, the non-sales weighted mean HSR is calculated per company as well as by simply calculating the mean HSR of all included products across all product categories and countries included for that company.

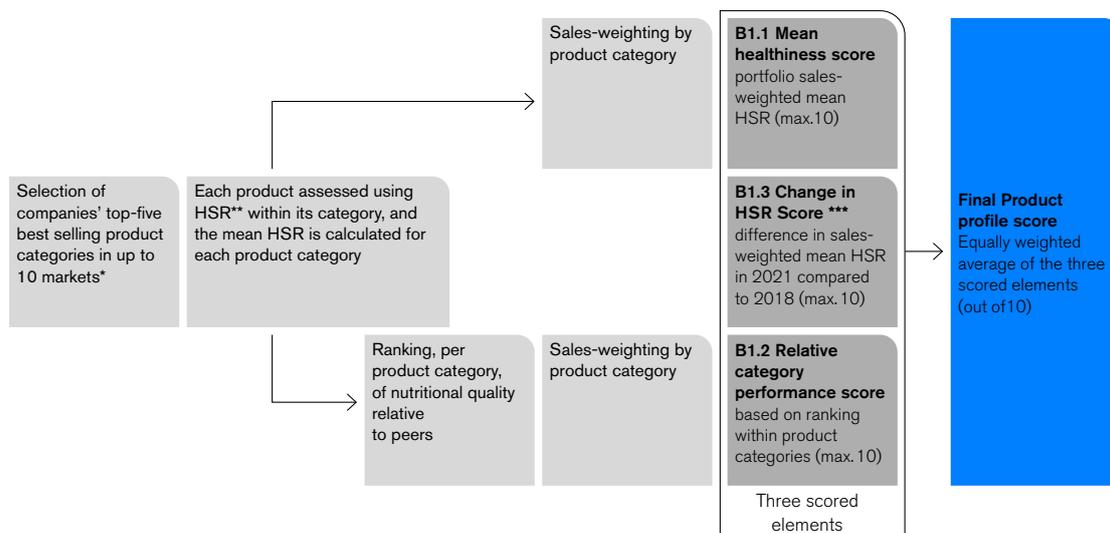
²⁸ Data extracted from Euromonitor International's 2020 industry publications of; Packaged Food, Hot Drinks and Soft Drinks.



- **Relative Category performance score:**²⁹ Within-category ranks are calculated for all product categories in which two or more companies are active. Next, a performance percentage is calculated from the inverted rank (e.g. first out of 10: inverted rank 10/10 = 100% performance score; tenth out of 10: inverted rank 1/10 = 10% performance score). An exception is made for categories in which only two companies compete: 75% and 25% performance scores are allocated for companies ranking first and second, respectively, to prevent extreme scores. As the final step, the sales-weighted company mean across all product categories in which the company competes with peers is calculated. The score on a scale of 0-100% is converted into a score out of 10.
- **Change in HSR score:**³⁰ This score quantifies the rate of change in portfolio healthiness, based on the difference in the companies' overall sales-weighted mean HSR score in 2020 compared to 2018. This applies only to companies assessed in both Indexes and takes into account only those countries that are included in both assessments. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.³¹ For every 0.1 increase in the overall sales-weighted mean HSR for 2020 over the 2018 HSR, a score of 20% is credited, leading to a maximum performance of 100% if the company achieves an increase of 0.5 HSR or more. The score on a scale of 0-100% is converted into a score out of ten.
- **The Product Profile score** is simply the equally weighted mean of the three scored elements, yielding a score that ranges between 0 and 10. If a company is assessed in the Product Profile for the first time, the final score is the equally weighted mean of two scored elements only, the healthiness score (sales-weighted mean HSR) and the relative category score.

The results of the Product Profile are integrated into the Corporate Profile in Category B1, indicators B1.1, B1.2 and B1.3 (see Appendix I).

Figure 8
Calculation of the Product Profile score



*Analysis based on each company's five best-selling categories in up to 10 selected markets that together cover at least 50% of their global retail sales. Based on data derived from the Euromonitor International's 2020 industry publications of; Packaged Food, Hot Drinks and Soft Drinks.

**Health Star Rating

***This applies only to companies previously assessed in the Global Index 2018 Products Profile and only includes countries which were common to both Product Profiles in 2018 and 2021. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.

²⁹ An earlier iteration of this methodology had additional exceptions for these elements which have since then been removed based on consultations with ATNI's Expert Group.

³⁰ An earlier iteration of this methodology had additional exceptions for these elements which have since then been removed based on consultations with ATNI's Expert Group.

³¹ This exception was introduced during the research phase.



A similar process is followed for the WHO Regional Nutrient Profile Models, which determine the number and percentage of products in each company's portfolio and in each relevant category that are suitable to be marketed to children. Using a threshold (yes/no), the models determine whether each unique product meets the WHO marketing to children nutrient criteria, on a category basis. For each company, and by category, the percentage of products that meet the WHO marketing to children criteria is calculated, as is the estimated percentage of sales derived from products meeting the criteria. The percentage of products within each category is then multiplied with the corresponding category retail sales values and is expressed as a percentage of total sales across those categories.³² These results are not included in the Product Profile score but provide an additional perspective on the healthiness of the companies' portfolios. They indicate the proportion of products to which a company's commitments regarding responsible marketing to children should apply—to avoid marketing these products to individuals under the age of 18.

The BMS / CF Marketing score

The BMS assessment is presented separately in the Indexes as a sub-ranking. However, the BMS Marketing score is used to adjust the Corporate Profile score of those F&B manufacturers in the main Index that also sell BMS and CF.

The **final BMS / CF Marketing sub-ranking and scores** are calculated by averaging the Corporate Profile assessment score (BMS / CF 1) and the in-country assessments of marketing practices (BMS / CF 2). The total possible score for each of the separate elements is 100% and the total possible overall BMS / CF score is 100%. A higher score indicates that the company has come closer to achieving full compliance with the recommendations of The Code and local regulations, as assessed using the ATNI methodology.

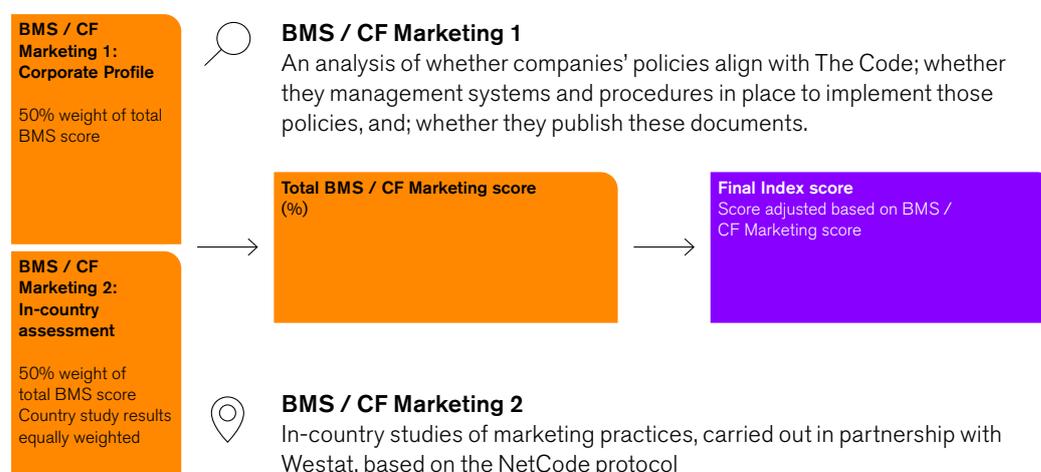
Further, the overall Corporate Profile scores of the F&B sector BMS companies are adjusted to reflect their BMS / CF Marketing scores. If a company scores 100%, no adjustment is made because its marketing of BMS and CF products complies fully with The Code, and, in the key markets studied, local regulations. If this is not the case, an adjustment is made, proportionate to the BMS / CF score, up to a maximum of -1.5 out of 10.

Some of the companies included in the BMS Marketing assessment are not included in the main Index (because they are not classified as F&B manufacturers). In these cases, they are not included in the main Global Index ranking and only receive a BMS Marketing score and ranking.

The approach to scoring is summarized in Figure 9.

Figure 9

Calculation of the BMS / CF Marketing score



³² Data extracted from Euromonitor International's 2020 industry publications of; Packaged Food, Hot Drinks and Soft Drinks.

Additional background material on ATNI's approach to assessing BMS Marketing can be found on our [website](#), including previous Index reports, scorecards for each BMS company and the [BMS Marketing methodology](#) used on the occasion of the 2018 Global Index. The BMS / CF Marketing methodology used for the assessment of this 2021 Index will be published shortly (Q3 2020).

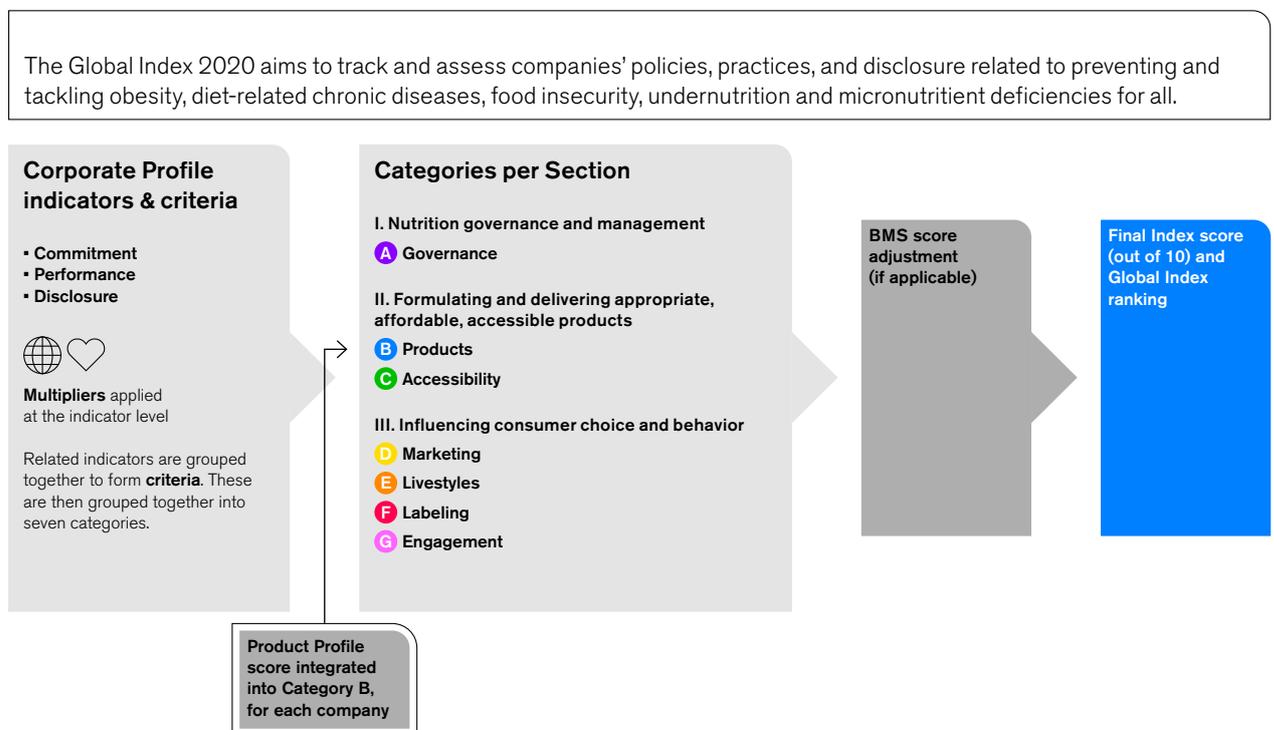
Final score and ranking

The final Corporate Profile scores (which already integrate the Product Profile scores) are rounded to one decimal, organized in numerical order and ranked 1-10. Where appropriate, the BMS score adjustment is made in order to obtain the final Global Index score. Figure 10 portrays how the three elements of the Index (Corporate Profile, Product Profile and BMS / CF Marketing score) interact to generate the final Global Index score and ranking.

The Global Index results will be published on ATNI's website in online and downloadable formats, including companies' final scores, the Product Profile and BMS / CF scores. Company scorecards will be published to highlight results by company and to indicate their strengths as well as to provide key recommendations.

Figure 10

Calculation of the Global Index score



Quality assurance processes

The validity of ATNI's analysis and related scoring depend on the accurate and consistent assessment of the material submitted or published by the companies about their commitments and performance, and of their disclosure. ATNI has a robust quality assurance process, which is integrated with the company engagement process (see Figure 5, [page 14](#)) to ensure ATNI analysts have access to optimal information on which to base the assessments, and to ensure consistency across the assessments and companies.

One dedicated research analyst from ATNI's team completes the assessment of one company to ensure optimal knowledge and understanding of the company's context and way of reporting. The internal consistency of company-reported information and data is verified by cross-checking information across related indicators.



An internal peer review is carried out twice during the process to check the consistency of assessment for all companies and all indicators, in order to ensure fair and consistent scoring. The first peer review focuses on the analyst's interpretation of all indicators and answer options, and how this aligns with the pre-assessment of company information. This takes place before the companies can engage for the first time to add information. The second peer review is carried out after all phases of company engagement have taken place, and before finalization of the assessments, and is more formal. One research analyst reviews the assessment of all indicators within one category and across all companies, to ensure that a consistent approach is applied. All seven categories are reviewed in this way and assessments are revised as needed. The ATNI research manager completes the final cross-check and companies review their own scorecards and best practice examples for factual accuracy prior to publication.

Limitations

Company commitments and self-reported performance:

The Corporate Profile relies on companies' self-reported information and data, as it is not feasible to perform independent, on-the-ground assessments of companies' practices across all the topics covered in the seven categories. Therefore, ATNI requires companies to provide evidence of performance and to implement independent auditing where relevant in the methodology. For example, in Category D, which addresses responsible marketing practices, companies are assessed regarding their public commitments, their commissioning of third party audits to review their marketing practices, and their ability to provide evidence of performing in line with their commitments.

Research process:

The interactive nature of the Corporate Profile research process involves engagement with company representatives to request more information and / or clarification in case the information basis for the assessment of single indicators is not complete and / or clear. Because of this interactive process, it is not practically feasible to generate commonly used statistics, such as inter- and intra-rater reliability, in a meaningful way as part of ATNI's quality assurance process. ATNI ensures that the assessments are accurate, consistent and fair across companies by applying an internal peer review system and frequent alignment within the research team (see 'Quality assurance process' on page 28, for more information).

Scope of markets selected for the Product Profile:

Having extensively piloted the Product Profile methodology, the first full Product Profile was undertaken for the 2018 Global Index. Products in up to nine markets (Australia, China, Hong Kong, India, Mexico, New Zealand, South Africa, the U.K. and the U.S.) were included, to provide representation across several continents. For the 2021 iteration of the Product Profile, the scope of countries included has been expanded to cover up to 10 markets for any given company in order to achieve a minimum coverage of 50% or more of the estimated global retail sales. Ideally, the Product Profile would encompass all countries in which a company is active so as to assess the healthiness of its global product portfolio. However, this approach is intended to be a pragmatic one (taking into account resources available for ATNI to do this work) that achieves a fair representation of the companies' global portfolios.

Scope of categories and products for the Product Profile:

Similarly, the Product Profile would ideally include products in all of a companies' product categories, but for practical reasons, ATNI limit analysis to the five best-selling categories for any company in each country selected, using the approach outlined above.

Specificity of the retail sales data in the Product Profile:

Product-level sales data would ideally be used to calculate the sales-weighted figures, rather than the product category-level sales data that is used currently. However, ATNI is currently unable to obtain that data set at an affordable cost from information providers.



Category scope of the HSR system:

The HSR model does not score some 'non-nutritive' products such as tea and instant coffee; as a result, these products are not included in the analysis. This means that the results for companies such as Unilever and Nestlé, for example, are based on their sales excluding these products. Plain water, on the other hand, is given a maximum HSR of five to encourage its consumption.

Baby foods are also excluded from the study as the two selected nutrient profiling models are not designed to assess these specialized products, as are minimally processed agricultural products.

Serving size of products:

Neither of the nutrient profiling models used take serving size into account. Some experts consider this to be a limitation while others believe it is a strength. One important determinant of weight gain is the quantity of food people choose to consume in one sitting (portion size). The serving size indicated on a multi-pack or provided within a single pack can influence how much of a product is eaten. Some argue that nutrient profiling models should include consideration of serving size—and some of the companies' systems do. However, the absence of agreed national and international standards has meant that, to date, it has not proved possible to consider serving size with the models used for this study. This may also account for the differences between the numbers of healthy foods identified by this study and by the companies themselves using their own models.

NDA:

Some of the data shared by the companies is provided under NDA and therefore cannot be referenced explicitly in the report. However, it is reviewed by ATNI research analysts and, if relevant, incorporated into their scores for commitment and performance indicators. By default, data shared with ATNI that is not publicly available is not taken into account for disclosure indicators.

Limited or no disclosure:

Some companies disclose limited or no information at all, either publicly or to ATNI under NDA. Scores for companies with limited or no disclosure are therefore lower and may not represent the companies' actual performance on any topic. ATNI's Indexes aim to stimulate transparency and public disclosure of nutrition and health information for the benefit of all stakeholders.

Different FYs and time periods assessed:

Companies sometimes publish relevant information after ATNI's deadline for data collection. This is because companies have different FYs and publishing timetables for their corporate reports. Any information that is published or disclosed to ATNI after the deadline is not included in their assessment or score.

Time constraints:

Completing the Corporate Profile assessment and providing feedback on the Product Profile product lists requires significant time from the companies. Time constraints may limit the amount of information they share that is not already publicly available.



Future development of the Global Index

A range of stakeholder consultations will gather feedback on the results of the Index and how the methodology for each element could be improved. ATNI will then develop proposals, and review them with the Expert Group. Once final revisions are agreed, this methodology document will be updated, as will the data gathering platform, ready for research for the subsequent Global Index to begin. This cycle will continue following the publication of each Index.

ATNI is already aware of additional elements that could be added in future to measure, for example, companies' spending on marketing healthy and less healthy foods and beverages; how well designed and effective their programs to improve public health are; and whether they take a responsible approach to lobbying. Moreover, were more funding available, the Index could be expanded to rate more manufacturers, or parallel Indexes could be developed to assess food retailers, food service providers and cafés, and restaurant chains.

Appendices

The appendices include:

- Appendix I: Global Index Corporate Profile Methodology 2021
- Appendix II: ATNI Expert Group members

Appendix I: Global Index Corporate Profile Methodology 2021

Healthy multiplier

A healthy multiplier is applied to any scores for commitment or performance indicators relating to 'healthy' products. The multiplier is derived from the company's score on Category B3 'Defining healthy and affordable products' and ranges between 0.5 (adjusting the underlying score) and 1 (having no effect on the underlying score).

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 1 if it applies globally, by 0.75 if that policy or performance applies to multiple major markets, and by 0.5 if it applies to a company's home or single market only).

Section 1 — Nutrition governance and management

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 of the Corporate Profile methodology.

A1 Corporate nutrition strategy		
Commitment		
High-level strategic commitments on nutrition and health		
1	Does the company publicly commit to placing a strategic focus on nutrition and health articulated in its mission statement and strategic commitments?	Mission statement mentions health and nutrition AND company states a strategic commitment to grow through a focus on nutrition and health
		Either the mission statement mentions nutrition and health, or a strategic commitment to grow through a focus on health and nutrition
		No clear focus on health and nutrition in mission statement or growth strategy
Additional information: The mission statement or an equivalent, such as a purpose statement, must be public in order to be credited in this indicator. A strategic focus on nutrition and health needs to be publicly disclosed and must be related to the core (commercial) business strategy of the company in order to be credited. It is not mandatory that both words 'nutrition' and 'health' are mentioned explicitly, but it should be unambiguous that both elements are covered.		
2.1	Does the company commit to delivering more healthy foods (according to the company's definition)?	Yes
		No
		No information
2.2 	Does the company make a commitment to addressing the specific needs of priority populations through healthy and appropriate products?	Yes
		No
		No information

A1 Corporate nutrition strategy

Additional information: Companies should address the nutrition policy priorities determined by public authorities in the markets in which they are active, as relevant to companies' portfolios and activities. In addition to improving the healthiness of products for the general population, ATNI assesses whether companies commit to addressing the needs of those groups experiencing, or at higher risk of malnutrition than the general population. All aspects of malnutrition are considered relevant if identified as a priority by public health authorities, and may encompass undernutrition, micronutrient deficiencies and overweight, obesity and diet-related diseases. Further, (risk of) malnutrition may be related to, or overlap with, aspects of food insecurity, defined as the uncertainties people face about their ability to obtain food and the need to reduce, at times during the year, the quality and / or quantity of food they consume due to lack of money or other resources.³³

To refer to these groups, ATNI uses the overarching term 'priority populations'. Throughout ATNI's methodology, the use of this term focuses on addressing nutrition priorities in a given environment. Several factors or determinants are potentially important in identifying and addressing priority populations in relation to nutrition priorities, which are addressed in the ATNI methodology:

- Nutritional factors related to age or life stages (e.g. women of childbearing age, infants, young children, elderly) and undernourished groups, with a specific focus on (the risk of) micronutrient deficiencies that can be addressed by appropriate fortification or using micronutrient-rich products, ingredients or commodities (addressed in Category B). Whether the marketing of such products is adapted appropriately to the context of the target groups is assessed in Category D, in addition to a general focus on responsible marketing of products to children and youth (i.e. refraining from marketing products that do not meet relevant health guidelines to these groups);
- Income and other socioeconomic and cultural factors are addressed in Category C in relation to the affordability and accessibility of healthy products. In addition, behavioral factors are relevant in Category E to assess if consumer-oriented educational and lifestyle programs are well attuned to the target audiences, e.g. in relation to nutrition literacy;
- Physical access factors e.g. in relation to rural or urban areas in which people's regular access to healthy foods may be limited: geographical factors are addressed in Category C — Criterion C2.

These factors, which vary by market and context, should be evident in the design and nature of companies' approaches to addressing all forms of malnutrition. ATNI will assess how companies identify the needs of priority populations in the markets in which they operate based on national and / or international guidelines and policies. Further, ATNI aims to credit companies' strategies that are universal but are resourced and delivered to respond to the specific nutritional needs of relevant population groups in a given market and context.

3  	3.1. Has the company formally set out how it intends to address all forms of malnutrition (i.e. undernutrition, micronutrient deficiencies and obesity and diet-related chronic diseases) through its commercial strategy?	Yes, comprehensively
		Yes, covering one or limited aspects of malnutrition only
		No
		No information
	3.2. [Supplemental score] And through its philanthropic / non-commercial approach?	Yes, comprehensively
		Yes, covering one or limited aspects of malnutrition only
		No
		No information

Additional information: The comprehensiveness of companies' commercial and philanthropic strategies will be assessed on a company level, dependent on the needs of the markets in which they operate, i.e. undernutrition may not be relevant for companies only active in developed markets.

The 'supplemental score' in relation to its philanthropic / non-commercial approach in indicator 3.2 is not necessary to obtain the maximum score for indicator 3. The highest answer option in indicator 3.1 is sufficient for that. However, when the score for indicator 3.1 is not maximal, indicator 3.2 can add a limited contribution (up to 30%) to the score of indicator 3 in total.

³³ FAO, IFAD, UNICEF, WFP and WHO. 2019. *The State of Food Security and Nutrition in the World 2019. Safeguarding against economic slowdowns and downturns*. Rome, FAO, p. 5. The same report defines the inverse — food security — as (page 186): "A situation that exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life. Based on this definition, four food security dimensions can be identified: food availability, economic and physical access to food, food utilization, and stability over time." Companies' contributions to these elements of food security are addressed throughout the ATNI methodology.

A1 Corporate nutrition strategy

4	Company's role in global (mal)nutrition commitments				
4.1	Does the company publicly recognize the targets set out in the WHO Global Action Plan for the Prevention and Control of NCDs 2013-2020?	<table border="1"> <tr> <td data-bbox="868 152 948 203">Yes</td> </tr> <tr> <td data-bbox="868 203 948 255">No</td> </tr> <tr> <td data-bbox="868 255 1495 306">No information</td> </tr> </table> <p>Additional information: The main focus of WHO Global Action Plan for the Prevention and Control of NCDs 2013-2020 is on four types of NCDs — cardiovascular diseases, cancer, chronic respiratory diseases and diabetes — that make the largest contribution to morbidity and mortality due to NCDs, and on four shared behavioral risk factors — tobacco use, unhealthy diet, physical inactivity and harmful use of alcohol. It recognizes that the conditions in which people live and work, and their lifestyles, influence their health and quality of life. ATNI works in line with the Global Action Plan, focusing mainly on nutrition-related NCDs, and on behavioral risk factors related to nutrition and physical activity.</p> <p>The Global Action Plan offers a paradigm shift by providing a road map and a menu of policy options for Member States, WHO, other UN organizations and intergovernmental organizations, NGOs and the private sector which, when implemented collectively between 2013 and 2020, will attain the nine voluntary global targets. Food and beverage companies have a key role to play in achieving the following targets, which is taken into account under this indicator:</p> <ul style="list-style-type: none"> ■ A 25% relative reduction in risk of premature mortality from cardiovascular diseases, cancer, diabetes, or chronic respiratory diseases; ■ A 30% relative reduction in mean population intake of salt / sodium; ■ A 25% relative reduction in the prevalence of raised blood pressure or contain the prevalence of raised blood pressure, according to national circumstances; ■ Halt the rise in diabetes and obesity; <p>For more information, see: https://www.who.int/nmh/publications/ncd-action-plan/en/</p>	Yes	No	No information
Yes					
No					
No information					
4.2	Does the company publicly commit to delivering nutrition-specific SDGs (Goal 2, Goal 3 and Goal 12)?	<table border="1"> <tr> <td data-bbox="868 913 1495 965">Yes, covering all three SDGs mentioned</td> </tr> <tr> <td data-bbox="868 965 1495 1066">Yes, covering one or two of the SDGs mentioned, or by acknowledging the central role of nutrition to achieve the SDG agenda and committing to address it</td> </tr> <tr> <td data-bbox="868 1066 1495 1117">No</td> </tr> </table> <p>Additional information: The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries — developed and developing — in a global partnership. They recognize that ending poverty and other forms of deprivation must go together with strategies that improve health and education, reduce inequality, and spur economic growth — all while tackling climate change and working to preserve our oceans and forests.</p> <p>ATNI considers that food and beverage companies have a key role to play in achieving the SDGs, and a more sustainable future for all. Particularly, with regards to:</p> <ul style="list-style-type: none"> ■ SGD 2, to end hunger, achieve food security and improved nutrition and promote sustainable agriculture; ■ SDG 3, focused on ensuring healthy lives and promote well-being for all at all ages; ■ SDG 12 which aims at ensuring sustainable consumption and production patterns (particularly considering target 12.3, focused on halving the per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses by 2030). <p>Although the ambition to reach zero hunger and healthy sustainable diets for all is most directly linked to SDG's 2, 3 and 12, at least 12 of the 17 Goals contain indicators that are related to nutrition. Without adequate and sustained investments in good nutrition, the complete set of SDGs will not be realized.</p> <p>For more information, see: https://sustainabledevelopment.un.org/sdgs and https://scalingupnutrition.org/nutrition/nutrition-and-the-sustainable-development-goals/</p>	Yes, covering all three SDGs mentioned	Yes, covering one or two of the SDGs mentioned, or by acknowledging the central role of nutrition to achieve the SDG agenda and committing to address it	No
Yes, covering all three SDGs mentioned					
Yes, covering one or two of the SDGs mentioned, or by acknowledging the central role of nutrition to achieve the SDG agenda and committing to address it					
No					



A1 Corporate nutrition strategy

Performance		
Nutrition-related business initiatives		
5 	Does the company conduct a nutrition-related business risk assessment at least every 2 years?	Extensive
		Limited
		No
		No information
<p>Additional information: Extensive risk assessment encompasses most elements of litigation risk, trend analysis, regulatory risk, market risk, specific category or brand risk and reputational risk. For example, these risks can be mentioned:</p> <ul style="list-style-type: none"> ■ Future nutrition-related taxes; ■ Impact of future potential nutrition-related litigation; ■ Impact of future potential regulation of marketing; ■ Impact of future potential regulation of labelling 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. 		
6	Has the company publicly stated that nutrition was a factor in the company's decisions about acquisitions, disposals and forming joint ventures (JV) 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
		Not applicable (no such decision in the last 3 years)
<p>Additional information: 'State' refers to an explicit mention in the annual report, a press release or other document regarding the disposal or acquisition of a business or unit in response to relevant health or nutrition trends. The document needs to be publicly disclosed by the company itself. If no acquisitions, disposals and or JVs or other partnerships occurred in the last 3 years, this indicator is not applicable and is removed from scoring.</p>		
Business initiatives focused on priority populations		
7 (NEW) 	What actions has the company taken to identify priority populations that are relevant in relation to the company context?	Priority populations have been identified based on priorities defined by relevant health and / or social care authorities
		No priority populations have been identified based on priorities defined by relevant health and / or social care authorities
		No information
<p>Additional information: Please provide concrete examples of priority populations that have been identified by the company in the comment sections on the ATNI data gathering platform.</p> <p>Please refer to the additional information related to A1 indicator 2 for an extensive description of the purpose of addressing priority populations' specific needs. It is imperative for a company to identify the relevant priority populations to know which groups are at (high) risk of or are already suffering from any form of malnutrition, in order to define specific strategies to address their nutritional needs.</p>		

A1 Corporate nutrition strategy

8 	Has the company undertaken a strategic review in the last 3 years of the commercial opportunities available to it in addressing specific needs of priority populations, and at what level of the company was this reviewed?	Yes, comprehensively and reviewed by the Board
		Yes, but limited and reviewed by the Board
		Yes, comprehensively but not reviewed at Board level
		Yes, but limited and not reviewed at Board level
		No strategic review
		No information
Additional information: For this indicator, a strategic review means a broad review that takes into account company-internal (e.g. portfolio, distribution, innovation strategy) and other considerations, which may include market research such as assessed in indicator 9. Malnutrition includes undernutrition, micronutrient deficiencies, obesity and diet-related diseases. A comprehensive review covers all of these types of malnutrition.		
9 	Has the company done market research or other types of studies to assess unmet needs of priority populations, including through products that address micronutrient deficiencies (which may be through micronutrient fortification, the use of fortified ingredients / staples and / or products inherently high in micronutrients) where relevant?	Yes
		No such market studies done
		No information
Additional information: In order to be credited, the objective of the market research or other types of studies should be to assess or identify unmet needs in the market that can be addressed commercially. Initiatives that are not part of the commercial strategy or philanthropic programs are not relevant for this indicator.		
10 	10.1. Is the company's commercial nutrition strategy and general approach to making its products healthier and addressing issues related to obesity and diet-related chronic disease:	Strategic and well-structured with a global strategy that is aligned with international guidelines
		Ad hoc
		Not articulated
	10.2. Is the company's commercial approach to address nutrition-related unmet needs of priority populations across the markets in which it is active:	Strategic and well-structured with a global strategy that is aligned with international guidelines
		Ad hoc
		Not articulated
		Not applicable
	10.3. [Supplemental score] Does the company or its foundation fund non-commercial public health and nutrition programs that serve priority populations?	Yes, based on a clear strategy or plan
		Yes, on an ad-hoc basis
		No
		No information
	Additional information: In the answer options, 'strategic' means that the company seems to have a clear rationale and approach for focusing on the target populations that the questions refer to; 'well-structured' means that it appears to follow a sensible process, following specific steps in all markets. The activities in question need to be part of the commercial strategy rather than being delivered through philanthropic programs or giving.	
Disclosure		
11	Does the company publicly disclose: (Tick all that apply)	Commitment to delivering more healthy foods (indicator 2.1)
		Commitment to reaching priority populations with healthy and appropriate products (indicator 2.2)
		Commitment / strategy for addressing malnutrition commercially (indicator 3.1)
12	Does the company publicly disclose:	Nutrition risk assessment (indicator 5)
13	Does the company publicly disclose: (Tick all that apply)	The strategic review (indicator 8)
		Studies on market need (indicator 9)



A1 Corporate nutrition strategy

14	Does the company publicly disclose: (Tick all that apply)	<p>Commercial approach to improving the healthiness of its products and addressing issues related to obesity and diet-related diseases (indicator 10.1)</p> <p>Commercial approach to addressing nutrition-related unmet needs of priority populations, including micronutrient deficiencies through products inherently high in micronutrients / fortified products where relevant (indicator 10.2)</p>
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A2 Nutrition governance and management systems

Performance		
Accountability and responsibility related to company's nutrition strategy and / or program		
1 	<p>1.1. Who has formal accountability for implementing the company's nutrition strategy and / or program?</p> <p>1.2. Is this accountability concretely linked to individuals' remuneration arrangements in relation to targets or objectives?</p>	<p>CEO or other senior Executive</p> <p>Committee that reports to the Board or an Executive Manager</p> <p>Senior manager one level below Executive</p> <p>Another less senior staff member</p> <p>No oversight assigned</p> <p>No information</p> <p>CEO's remuneration is specifically linked to performance on nutrition objectives</p> <p>CEO's remuneration is linked to performance on corporate social responsibility (CSR) initiatives (nutrition clearly being part of those initiatives)</p> <p>Only links senior managers' remuneration to performance on nutrition objectives</p> <p>No link</p> <p>No information</p> <p>Additional information: Note that the <i>accountable person</i> is the individual who is ultimately answerable for the activity or decision. This includes 'yes' or 'no' authority and veto power. Only one accountable person can be assigned to an action.</p>
2	Does the accountability arrangement for implementing the company's nutrition strategy and / or program explicitly cover:	
2.1 	The company's commercial strategy / program to address undernutrition and / or micronutrient deficiencies?	<p>Yes, at the same managerial level as the company's overall nutrition strategy / program</p> <p>Yes, at a lower managerial level than the company's overall nutrition strategy</p> <p>Not covered explicitly</p> <p>No information</p> <p>Not applicable</p>
2.2. 	The company's commercial strategy / program for improving the affordability and availability of its healthy products?	<p>Yes, covering both aspects at the same managerial level as the company's overall nutrition strategy / program</p> <p>Yes, covering both aspects at a lower managerial level than the company's overall nutrition strategy or covering only one aspect at the same managerial level</p> <p>Yes, covering only one aspect at a lower managerial level than the company's overall nutrition strategy</p> <p>Both aspects are not covered explicitly</p> <p>No information</p>
Additional information: Formal statement required.		

A2 Nutrition governance and management systems

Internal business performance evaluation and auditing		
3 	Is the company's nutrition strategy / program approved by the Board of Directors and is its delivery subject to an annual standard internal audit and annual management review? (Tick all that apply)	Nutrition strategy / program is approved by the Board
		Annual internal audit of strategy / program delivery is in place
		Annual management review of strategy / program delivery is in place
	<p>Additional information: Note that <i>internal auditing</i> or first party auditing is an assurance and consulting activity undertaken by the company itself designed to add value and improve an organization's operations. It helps an organization accomplish its objectives and internal standards by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes. Such audits are most often performed by auditors employed within the organization.</p> <p><i>Management review</i> is the routine evaluation of whether management systems are performing as intended and producing the desired results as efficiently as possible. It is the ongoing 'due diligence' review by management that fills the gap between day-to-day work activities and periodic formal audits.</p>	
4 	Does the company include food loss and waste (FLW) tracking and prevention tools in its management system? (Tick all that apply)	Including FLW within the Key Performance Indicators (KPIs) at executive management level
		Value stream mapping along the production chain focused on identifying FLW
		Application of the FLW Accounting and Reporting Standard
		Application of the Sustainability Accounting Standards
		Other methods / please specify which
	<p>Additional information: Reducing FLW is an important sustainability goal that links closely to access to nutrition, undernutrition and the right to food. The less FLW there is, the greater the supply of food, which obviously impacts consumers' access to nutrition. This indicator's aim is to assess the extent to which the company has mechanisms in place to prevent and reduce FLW in the production process (i.e. within the stages of the food chain where manufacturers have most decision-making power: agricultural production, post-harvest handling and storage, and mainly in processing — downstream stages are not considered). These include, inter alia: i) including FLW within the KPIs; ii) applying Value Stream Mapping tools (which help identify and understand the flow of materials and information of a product as it makes its way through the value stream) to reduce FLW in supply chains. Thus, this system is used to identify lean wastes (i.e. defects, overproduction, inappropriate processing, unnecessary inventory, unnecessary motion, transport and waiting) or the drivers (product-specific, generic or systemic) that cause the loss or waste of a product; iii) applying the FLW Accounting and Reporting Standard, a tool to quantify and report on FLW designed to help public and private actors — from cities to manufacturers — set targets for FLW reduction. This tool was developed by the Food Loss & Waste Protocol, a multi-stakeholder partnership whose mission is to ensure wide adoption of the FLW Standard and to grow understanding of the problem and its impact.</p> <p>Lastly, the Sustainability Accounting Standards Board (SASB) was founded in 2011 as an independent standard-setting organization. The SASB issues and maintains sustainability accounting standards for 79 industries, focusing on the subset of industry-specific sustainability factors that are reasonably likely to have material financial impacts on companies within that industry. Companies can use the standards to disclose material information to investors in SEC filings, including Forms 10-K, 20-F, and 8-K, as well as S-1 and S-3, in a cost-effective and decision-useful manner. The standards are designed to help companies better comply with existing disclosure obligations, working within the framework of existing U.S. securities laws. SASB includes accounting metrics for food waste management (which also observes food loss) targeted at the food retailers and distributors industry.</p> <p>ATNI uses the definition of the Food and Agriculture Organization of the United Nations (FAO) for food loss and food waste. Food loss consists of "all the food produced for human consumption that is not eaten by humans". Food waste is "considered to be a part of food loss and is understood as food intended for human consumption being discarded or left to spoil as a result of decisions taken by actors along the food supply chain". Food loss and food waste happen at different stages of the food chain and are caused by different driving forces. (For more information, see: www.fao.org/3/ca1397en/CA1397EN.pdf)</p>	
Disclosure		
5	Does the company publicly disclose: (Tick all that apply)	Formal accountability arrangement for implementing the company's nutrition strategy and / or program (indicator 1.1)
		Compensation arrangements related to implementing the company's nutrition strategy and / or program (indicator 1.2)
6	Does the company publicly disclose: (indicator 3)	The process and / or results of its audit or management review
7	Does the company publicly disclose the FLW tracking and prevention tools it has implemented? (indicator 4)	Yes, comprehensively
		Yes, in part
		No
		No information



A3 Quality of reporting

3 Geographical scope of nutrition reporting		
3.1	What is the geographical scope of the company's nutrition reporting?	Reporting covers global operations
		Reporting only covers major markets
		No reporting
	Additional information: -	
3.2	Does the company make specific reference to different markets in the published periodic reports?	For several major national markets
		For 1-2 national markets only
		No additional reporting
	Additional information: -	
4 External verification of reported data		
4	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
	Additional information: Documents must be publicly available.	



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

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 firstly assesses the nutrition quality of a substantial part of all food and beverage products companies sell globally through the Product Profile using Health Star Rating (HSR). Secondly, it addresses companies' efforts through research and development (R&D), new product formulation and reformulation of existing products. Lastly, Category B assesses the quality of the nutrient profiling system (NPS) or model that a company may use to guide its product formulation efforts.

This Category consists of three Criteria:

B1 Product Profile results (20%)

B2 Product formulation (7.5%)

B3 Defining healthy and appropriate products (7.5%)

This Category carries 35% of the weight of the overall score Corporate Profile methodology.

B1 Product Profile results		
	Performance	
	Scores imported from the Product Profile	
1 (NEW)	Assessment of the overall healthiness of the product portfolio, measured as the sales-weighted mean HSR score: [value between 0 and 100]	i. This value is calculated in the Product Profile (PP) and imported in this indicator (company input is obtained during the data gathering phase of the PP).
2 (NEW)	Assessment of the companies' performance within product categories, relative to competition, measured as the mean within-product category score: [value between 0 and 100]	i. This value is calculated in the PP and imported in this indicator (company input is obtained during the data gathering phase of the PP).
3 (NEW)	Assessment of the change in product portfolio healthiness compared with the 2018 Product Profile: [value between 0 and 100]	i. This value is calculated in the PP and imported in this indicator (company input is obtained during the data gathering phase of the PP).

B2 Product formulation		
	Commitment	
	Nutrient formulation and reformulation targets	
1 	Salt / sodium targets	
	Additional information: The WHO Member States in WHA 66.10 have agreed on a voluntary global NCD target for a 30% relative reduction in mean population intake of salt, with the aim of achieving a target of less than 5 g per day (approximately 2 g sodium) by 2025.	
1.1	Has the company set a target to reduce levels or achieve lower stated levels of salt/sodium and, if so, in how many products or categories?	The company has set a target to reduce levels of salt / sodium in all relevant products / categories The company has set a target to reduce levels of salt / sodium in some relevant products / categories No salt reduction target No information Not applicable (explain)

B2 Product formulation

1.2	Baseline and target year: (Tick all that apply)	<p>The company has defined a specific and measurable (quantifiable) target</p> <p>The target encompasses either objective nutrition criteria or limits (sets limits per g / ml / kcal or specifies a (mean) target value), or relative reduction criteria with full specification of the baseline value</p> <p>The target is time-bound</p> <p>The target is externally verifiable (does not rely on company-internal definitions or information for verification)</p>
2 	Trans fat targets Additional information: WHO recommends that the amount of industrial trans-fat (iTFA) in products does not exceed 2 g of iTFA per 100 g fat / oil globally by 2023 (https://www.who.int/news-room/detail/07-05-2019-who-welcomes-industry-action-to-align-with-global-trans-fat-elimination-targets).	
2.1	Has the company set a target to eliminate or reduce industrially-produced trans-fat in accordance with WHO guidance?	<p>Target aligns with WHO recommendation to eliminate industrially-produced trans fat in all relevant products/ categories</p> <p>Target aligns with WHO recommendation to eliminate industrially-produced trans fat in some relevant products/ categories</p> <p>Target does not align with WHO recommendation</p> <p>No trans-fat reduction target</p> <p>No information</p> <p>Not applicable (explain)</p>
2.2	Baseline and target year: (Tick all that apply)	<p>The company has defined a specific and measurable (quantifiable) target</p> <p>The target encompasses objective criteria or limits based on percentage of energy or weight</p> <p>The target is time-bound</p> <p>The target is externally verifiable (does not rely on company-internal definitions or information for verification)</p>
3 	Saturated fats targets Additional information: -	
3.1	Has the company set a target to reduce levels or achieve lower stated levels of saturated fats and, if so, in how many products or 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>No saturated fat reduction target</p> <p>No information</p> <p>Not applicable (explain)</p>
3.2	Baseline and target year: (Tick all that apply)	<p>The company has defined a specific and measurable (quantifiable) target</p> <p>The target encompasses either objective nutrition criteria or limits (sets limits per g / ml / kcal or specifies a (mean) target value), or relative reduction criteria with full specification of the baseline value</p> <p>The target is time-bound</p> <p>The target is externally verifiable (does not rely on company-internal definitions or information for verification)</p>

B2 Product formulation

	Added sugars targets	
	Additional information: Depending on the product portfolio, it may be relevant for the company to define either an added sugar reduction target, or a calorie reduction target. Both types of reduction targets are scored equally, and only one type of target is sufficient for a full score on this indicator.	
4 	Did the company set an added sugar target / threshold or a calorie reduction target / threshold	Added sugar
		Calorie
		Not applicable
	If added sugars	
4.1	Has the company set a target to reduce levels or achieve lower stated levels of added sugars and, if so, in how many products / categories??	The company has set a target to reduce levels of added sugars for all relevant products / categories
		The company has set a target for levels of added sugars for some relevant products / categories
		No sugar reduction target
		No information
		Not applicable (explain)
4.2	Baseline and target year: (Tick all that apply)	The company has defined a specific and measurable (quantifiable) target
		The target encompasses either objective nutrition criteria or limits (sets limits per g / ml / kcal or specifies a (mean) target value), or relative reduction criteria with full specification of the baseline value
		The target is time-bound
		The target is externally verifiable (does not rely on company-internal definitions or information for verification)
	If calories	
4.1	Has the company set a target to reduce levels or achieve lower stated levels of calories and, if so, in how many products / categories?	The company has set a target to reduce calories or reach a lower level of calories across all relevant products / categories
		The company has set a target to reduce calories or reach a lower level of calories for only some products / categories
		No calories reduction target
		No information
		Not applicable (explain)
4.2	Baseline and target year: (Tick all that apply)	The company has defined a specific and measurable (quantifiable) target
		The target encompasses either objective nutrition criteria or limits (sets limits per g / ml / kcal or specifies a (mean) target value), or relative reduction criteria with full specification of the baseline value
		The target is time-bound
		The target is externally verifiable (does not rely on company-internal definitions or information for verification)
5 	Fruits, Vegetables, Nuts, Legumes (FVNL) targets	
	Additional information: In scope are fruits, vegetables, nuts and legumes in alignment with the WHO Healthy Diet fact sheet 394. This excludes starchy roots such as potato, sweet potato and cassava. Furthermore, constituents, isolates or extracts of a food are excluded.	



B2 Product formulation

5.1	Has the company set a target to increase levels or achieve higher stated levels of fruits, vegetables, nuts, and legumes and, of so, in how many products or categories?	The company has set a target to increase levels of FVNL in all relevant products / categories
		The company has set a target to increase levels of FVNL in some relevant products / categories
		No FVNL increase target
		No information
		Not applicable (explain)
5.2	Baseline and target year: (Tick all that apply)	The company has defined a specific and measurable (quantifiable) target
		The target encompasses either objective nutrition criteria or goals (sets goals per g / ml / kcal or specifies a (mean) target value), or relative criteria to increase FVNL with full specification of the baseline value
		The target is time-bound
		The target is externally verifiable (does not rely on company-internal definitions or information for verification)
6 	Whole grains targets	
	Additional information: -	
6.1	Has the company set a target to increase levels or achieve higher stated levels of whole grains and, if so, in how many products or categories?	The company has set a target to increase levels of whole grains in all relevant products / categories
		The company has set a target to increase levels of whole grains in some relevant products / categories
		No whole grains increase target
		No information
		Not applicable (explain)
6.2	Baseline and target year: (Tick all that apply)	The company has defined a specific and measurable (quantifiable) target
		The target encompasses either objective nutrition criteria or goals (sets goals per g / ml / kcal or specifies a (mean) target value), or relative criteria to increase whole grains with full specification of the baseline value
		The target is time-bound
		The target is externally verifiable (does not rely on company-internal definitions or information for verification)
	Performance	
	Portion control	
7 	In the last 3 years, has the company invested in or developed products with smaller packaging sizes or serving sizes, aimed to improve consumer portion control?	Yes, across multiple products or product categories
		Yes, limited to one type of product or product category
		No
		No information
		Not applicable

B2 Product formulation

<p>8</p> 	<p>In the last 3 years, has the company undertaken research to demonstrate the efficacy of its portion control efforts on consumer behavior?</p>	<p>Yes, with evidence of efficacy (improvement of portion control)</p> <p>Yes, without evidence of efficacy</p> <p>No</p> <p>No information</p> <p>Not applicable</p> <p>Additional information: This indicator applies to selected product categories that typically have a high sugar or energy content and low 'beneficial' nutrient density (confectionery, carbonated drinks, juice, sports and energy drinks, Asian specialty drinks, savory snacks, ice creams).</p>
<p>R&D investment to improve nutrition</p>		
<p>9</p>	<p>Does the company provide evidence of investment in research or new technologies that enables the development or improvement of products aimed at addressing the specific needs of priority populations, including undernutrition where relevant?</p>	<p>Yes</p> <p>No</p> <p>No information</p> <p>Additional information: This indicator focuses on R&D investments that enables the development or improvement of products aimed at addressing priority populations, rather than the development of the products themselves. Relevant examples include research into: milder processing to retain more nutritional value in processed foods; (micro)nutrient deficiencies and bioavailability; new ways to do (bio)fortification; improved (refrigerated) distribution or packaging in low-resource settings to improve shelf life of fortified products.</p>
<p>Developing and selling products specifically aimed at priority populations</p>		
<p>10</p>	<p>As part of its approach to addressing the needs of priority populations, has the company developed specific products in the last 3 years aimed at as the following age groups or other population groups: (Tick all that apply)</p>	<p>Women of childbearing age</p> <p>Children between 6 and 36 months (complementary foods only)</p> <p>Children between 3 and 5 years</p> <p>Children over 5 years</p> <p>Elderly</p> <p>Other population groups (specify)</p> <p>Not applicable</p> <p>Additional information: Many factors or determinants can be relevant for the identification of priority populations (see A1 indicator 2 for more extensive information), as defined by public health authorities. This indicator focuses on age or life stages and how these relate to a high risk or burden of malnutrition compared to the general population. The indicator assesses whether companies address such age groups in their wider strategy to addressing the specific nutritional needs of priority populations with a focus on the formulation of products, for example by developing specifically formulated and / or fortified products that address nutritional deficiencies in undernourished populations or populations that are at particular risk.</p> <p>The focus of this indicator is on the R&D effort related to developing new products or improving existing products. Therefore, companies are not scored for having products on the market for longer than 3 years.</p> <p>ATNI defines 'women of childbearing age' as women aged 15 to 49 years old, in line with WHO terms. Moreover, 'elderly' refers to individuals with a chronological age (i.e. years since birth) of 65 years and above.</p> <p>Finally, it is essential that companies that make products marketed as suitable for children between 6 and 36 months of age abide by the WHO International Code of Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions (including WHA 69.9). Hence, companies that generate significant sales from Breast-milk Substitutes and / or Complementary Foods for this age group are also assessed against the ATNI's BMS /CF 1 Corporate Profile methodology. However, as stated above, this indicator only focuses on products manufactured to address specific nutritional needs within these age groups (i.e. not all products aimed at children 6 – 36 months will be considered). Finally, 'Complementary Foods' are defined as commercially produced food or beverage products that are specifically marketed as suitable for feeding children up to 36 months of age (WHO, 2017. <i>Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children: Implementation Manual</i>).</p>

B2 Product formulation

Improving access to nutrition by reducing food loss / waste in production		
11 	Can the company provide examples of measures taken to improve the food supply chain efficiency in order to reduce food loss / waste? (Tick all that apply)	During processing / manufacturing
		During distribution
		Indirectly during states of agricultural production, post-harvest handling and storage, and during consumption
	<p>Additional information: The food supply chain stages are: agricultural production, post-harvest handling and storage, processing, distribution and consumption.</p> <p>Reducing FLW is an important sustainability goal that links closely with access to nutrition, undernutrition and the right to food. ATNI uses the definition of the FAO for food loss and food waste. Food loss consists of “all the food produced for human consumption that is not eaten by humans”. Food waste is “considered to be a part of food loss and is understood as food intended for human consumption being discarded or left to spoil as a result of decisions taken by actors along the food supply chain”. Food loss and food waste happen at different stages of the food chain and are caused by different driving forces. (For more information, see: www.fao.org/3/ca1397en/CA1397EN.pdf and additional info provided under A1 indicator 4.2)</p> <p>Under this indicator, ATNI considers companies' measures tackling food loss and waste prevention connected to their commercial activity (philanthropic initiatives will not be considered). As the focus of Criterion B2 is on product composition and reformulation, the focus is on early stages of the food supply chain, but production, packaging, distribution and other factors may also impact FLW in later stages of the food supply chain).</p>	
Disclosure		
12	Does the company publicly disclose: (Tick all that apply)	<p>A commentary on investments made in research or other business areas to develop products aimed at priority populations (indicator 9)</p> <p>A commentary on products developed for the specific age groups referred to in indicator 10, or other priority population groups (indicator 10)</p>
Information about company's 'healthy' products		
13	13.1. Does the company publicly disclose the percentage of the company's 'healthy' products (according to company's definition of healthy) as part of the total global product portfolio by the end of FY 2019?	Yes
		No
	Additional information: -	
	13.2. Does the company publicly disclose the total number, or the change in percentage, of the number of new healthy products (according to company's definition of healthy) introduced in the last 3 years:	Yes
	No	
Additional information: -		
Disclosure related to products that meet company targets		
14	Does the company publicly disclose: (tick all that apply)	Its sodium / salt target
		The percentage of all relevant products (by number or volume) that met its sodium / salt target by FY 2019
15	If assessed on added sugars: Does the company publicly disclose: (tick all that apply)?	Its sugar target
		The percentage of all relevant products (by number or volume) that met its sugar target by FY 2019
	If assessed on calories: Does the company publicly disclose: (tick all that apply)	Its calorie target
		The percentage of all relevant products (by number or volume) that met its calorie target by FY 2019
16	Does the company publicly disclose: (tick all that apply)	Its saturated fat target
		The percentage of all relevant products (by number or volume) that met its saturated fat target by FY 2019



B2 Product formulation

17	Does the company publicly disclose: (tick all that apply)	Its trans-fat target
		The percentage of all relevant products (by number or volume) that met its trans-fat target by FY 2019
18	Does the company publicly disclose: (tick all that apply)	Its fruits, vegetables, nuts, legumes target
		The percentage of all relevant products (by number or volume) that met its fruits, vegetables, nuts, legumes target by FY 2019
19	Does the company publicly disclose: (tick all that apply)	Its whole grains target
		The percentage of all relevant products (by number or volume) that met its whole grains target by FY 2019

B3 Defining healthy and appropriate products

	Performance	
	Company's Nutrient Profiling System and definition of products' healthiness	
1	Does the company have a Nutrient Profiling System (NPS), or multiple? (For information only, i.e. not scored)	Yes
		No
		No information
	If yes:	
1.1	Is an NPS used to guide new product development / (re) formulation?	Yes
		No
		No information
1.2	Is the same NPS used to determine which products can be marketed to children?	Yes
		No, another NPS system is used for that purpose
		No
		No information
	Additional information: -	
2 	Is the company's definition of healthy products linked to the NPS used?	Yes, explicitly based on objective nutrition criteria, covering all products
		Yes, but not all nutrition criteria are clearly defined or not all products are covered
		No
		No information
	Additional information: All products covered in the scope of the Corporate Profile are considered here. This excludes specialty products such as BMS products, medical nutrition, weight-loss products, etc.	
3 	In respect of the NPS that the company uses to guide new product development or (re)formulation, is that system:	A formal internal NPS that calculates overall nutritional quality scores for each product, or defines extensive product category-specific nutrition criteria
		A pre-cursor to a full NPS, e.g. a tool to assess levels of salt, fat, sugar etc. and rates them high, medium, or low, or above or below a threshold, but which does not calculate overall nutritional quality
		No system is in place
		No information
	Additional information: -	

B3 Defining healthy and appropriate products

4	Does the company provide evidence that its definition of healthy products or products that meet its nutrition criteria, aligns with external benchmarks?	
	4.1. Tick the answer option that applies:	Its definition of healthy products corresponds with the HSR* ≥ 3.5 definition of healthy (smaller than 10% deviation in estimated percentage of healthy products)
		Its definition of healthy products is benchmarked by the company to external standards but the deviation with HSR* ≥ 3.5 criterion is larger than 10%
		Its definition of healthy products is NOT benchmarked to external standards
		No information
	4.2. Tick the answer option that applies:	For products marketed to children, its nutrition criteria correspond with regional WHO criteria for marketing to children or the percentage deviation of products meeting both criteria is smaller than 10%
		For products marketed to children, its nutrition criteria do NOT correspond with regional WHO criteria for marketing to children or the percentage deviation of products meeting both criteria exceeds 10%
		No information
	<p>Additional information: *As an alternative to benchmarking 'healthy products' to the Health Star Rating system using the ≥ 3.5 threshold, other government-endorsed systems may be benchmarked against to obtain a score in this indicator. Benchmarking against the Nutri-Score NPS, considering all A and B products as healthy, is considered equivalent. For benchmarking against other government-endorsed systems the answer option 'Its definition of healthy products is benchmarked by the company to external standards but the deviation with HSR* ≥ 3.5 criterion is larger than 10%' will be selected if a healthy threshold (equivalent) cannot be determined.</p> <p>Regional Nutrient Profile Models to implement recommendations on the marketing of foods and non-alcoholic beverages to children have been defined by the World Health Organization for all regions (except for Africa as of 22 August 2019, but the publication of that model is pending). Links to descriptions of those models can be found here: https://www.who.int/nutrition/reg_offices/en/.</p> <p>For this indicator, only two answer options can be selected — one of the first three options and one of the remaining two options. In case companies commit to not market any products to children, the relevant answer option is 'Its nutrition criteria correspond with regional WHO criteria for marketing to children or the percentage deviation of products meeting the both criteria is smaller than 10%'</p>	
	Products covered under the company's NPS	
5	Which products and categories are covered by the company's NPS?	All products and product categories
		Some products and product categories
		No products and categories (no NPS)
		No information
Additional information: -		
6	What types of food components does the company's NPS assess?	Both positive and negative food components
		Negative food components only
		None (no NPS)
		No information
		Not applicable
<p>Additional information: If a company explicitly applies the WHO regional models or other government-endorsed models as its NPS and which does not include positive food components, 'not applicable' should be selected, to avoid a sub-optimal assessment. Please note that for a company's own NPS, which may be based on WHO or other guidelines, this does not apply.</p>		



B3 Defining healthy and appropriate products

7	Does the company fortify only products of high underlying nutritional quality, i.e. meeting certain nutrition criteria?	Yes, meeting nutrition criteria in its NPS
		Yes, meeting other nutrition criteria
		No
		No information
		Not applicable
Additional information: -		
Alignment of product (re)formulation criteria with national and international guidelines		
8 	Does the company publicly state that its approach to formulation or reformulating products is aligned to (inter) national (or regional, e.g. EU) dietary guidelines?	International, national or regional (e.g. EU) dietary guidelines
		No commitment to reformulating products or no information
		Not applicable
Additional information: -		
9	Does the company base its approach to fortification of products aimed at addressing undernutrition on international guidance on fortification (i.e. CODEX CAC/GL 9-1987 and the WHO/FAO Guidelines on Food Fortification with Micronutrients)?	Yes
		No
		No information
		Not applicable
Additional information: WHO/FAO Guidelines on Food Fortification with Micronutrients: https://www.who.int/nutrition/publications/micronutrients/9241594012/en/ For this indicator to be scored, both guidelines should be followed, or it should be clear that their approach is equivalent.		
Disclosure		
10	How does the company publish its NPS to allow all stakeholders to assess and understand it? (Indicator 3)	In full and in a peer reviewed journal when the company applies its own NPS, or explicitly referring to WHO or government-endorsed models if these are applied
		In full by the company itself
		Limited information or on request only
		Not published
11	Does the company publicly disclose: (Tick all that apply with a maximum of 2 options) (Indicator 4)	A benchmarking of its internal NPS-based definition of healthy products versus the HSR ≥ 3.5 definition of healthy
		A benchmarking of its internal NPS-based definition of healthy products against another internationally recognized and government-endorsed NPS
		A benchmarking of its internal NPS-based definition to identify products suitable for marketing to children, versus the regional WHO criteria for marketing to children (or the company publicly commits to not market any products to children)
12	Does the company publicly disclose: (Tick all that apply) (Indicator 7)	A statement that it only fortifies products of high nutritional quality (Indicator 7)
		A statement that its fortification approach is based on international guidance (i.e. CODEX CAC/GL 9-1987 and the WHO/FAO Guidelines on Food Fortification with Micronutrients) (Indicator 9)
		Not applicable (Indicator 7)

Category C – Delivering affordable, accessible products

Producing healthier options is necessary but insufficient to improve consumer access to nutritious foods and beverages. Consumers also need to have access to these products. Companies should offer nutritious options 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 15% of the weight of the overall score Corporate Profile methodology.

C1 Product pricing		
Commitment		
Improving affordability of healthy products and products addressing micronutrient deficiencies		
1 	1.1. Has the company made a public commitment to address the affordability of its healthy products for the general consumer and for priority populations accounting for low-income groups in the last 3 years?	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
		Broad commitment without particular reference to low-income populations
		No commitment
		No information
<p>Additional information: Clear commitment means a public statement in a policy or other document setting out how the company will ensure affordability, consider it when developing new products, in all key decisions re. placement, distribution etc. The commitment should specifically address the affordability of healthy products, e.g. relative to other products or referring specifically to products meeting the company's healthy criteria. A general commitment to address or improve the affordability of all products is not sufficient to be credited. The company's own definition of healthy products is considered relevant for this indicator, and throughout Criterion C1. Portion-limited products that do not otherwise meet healthy standards are not considered relevant as healthy products for this indicator and category overall (in general, products or product categories such as confectionery, sugary drinks or ice cream are not considered as healthy products unless there is a specific reason to make an exception).</p>		
1.2. Has it committed to addressing in its commercial activities the affordability of healthy products designed to address micronutrient deficiencies in priority populations?	Yes	
	No	
	No information	
	Not applicable	

C1 Product pricing

Additional information: For appropriate guidance on fortification schemes, ATNI recommends following the WHO/FAO Guidelines on Food Fortification with Micronutrients: <https://www.who.int/nutrition/publications/micronutrients/9241594012/en/>

It is important to address the affordability of fortified or otherwise appropriate products, designed to address micronutrient deficiencies in priority populations, as these groups often have a low income and corresponding spending power.

To indicate populations that are at (high) risk of or experiencing malnutrition in all its forms, including undernutrition, micronutrient deficiencies, obesity and diet-related diseases, ATNI uses the overarching term 'priority populations'. More specifically, ATNI defines priority populations as 'those groups that are at (high) risk of or suffering from any form of malnutrition (including undernutrition or any other deficiency, excess or imbalance in a person's intake of energy and / or nutrients), and for which intervention may be reasonably considered to have a substantial impact at the population level.'

Under Category C, ATNI specifically observes the following determinants or factors to identify population groups suffering from or at risk of nutrition-related health inequities:

- Socioeconomic factors such as income, which in turn lead to an increased burden of nutrition-related illness or increased risk for adverse nutrition-related health outcome(s) such as micronutrient deficiencies; and
- Geographical factors (i.e. remote access to supermarkets or food distribution centers), which are physical barriers in accessing nutrition.

2



2.1. Does the company have a clear strategy, and one or more quantitative targets, to specifically improve the affordability of healthy products?

Yes, it has defined a clear strategy AND one or more targets

Yes, it has defined a clear strategy OR one or more targets

No clear strategy and / or targets

No information

Additional information: Specifically improving the affordability of healthy products may be done by explicitly focusing on products that meet the company's healthy standard (related to nutrition criteria in its NPS), or by addressing affordability of healthy products relative to products not meeting healthy standards.

Targets considered for scoring regarding healthy products may include examples such as:

- 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
- Targets set with particular reference to low-income groups

2.2. Does the company have a clear strategy, and one or more quantitative targets, to improve the affordability of healthy products aiming to address micronutrient deficiencies in priority populations?

Yes, it has defined a clear strategy AND one or more targets

Yes, it has defined a clear strategy OR one or more targets

No clear strategy and / or targets

No information

Not applicable

Additional information: Targets considered for scoring regarding products addressing micronutrient deficiencies may include these examples:

- Number of consumers to reach with affordably priced healthy products aiming to address micronutrient deficiencies by set date;
- Number of units or sales value target for affordably priced healthy products aiming to address micronutrient deficiencies by set date;
- Achieve a particular price point for healthy products aiming to address micronutrient deficiencies;
- Narrow the price differential on fortified vs non-fortified products;
- Targets set with particular reference to low-income groups, which may include providing smaller packages of healthy fortified foods to lower the price point of single purchase units.



C1 Product pricing

Performance		
Commercial strategies to improve affordability		
3 	Has the company done a comprehensive analysis on appropriate pricing of products that meet its healthy standard for the general consumer and for priority populations (i.e. low-income groups) in the last 3 years?	Yes, with specific attention to low-income groups
		Yes, without specific attention to low-income groups
		No analysis on appropriate pricing has been conducted
		No information
Additional information: The pricing analysis should specifically address healthy products, e.g. relative to other products. A general analysis of pricing of all products is not sufficient to be credited. Portion-limited products that do not otherwise meet healthy standards are not considered relevant for this indicator and category overall.		
4 	Does the company provide evidence that it has specifically offered discounts, price promotions or coupons on its healthy products?	Yes, with specific attention to low-income groups
		Yes, without specific attention to low-income groups
		No evidence provided
		No information
Additional information: Specifically offering discounts, price promotions or coupons on its healthy products may be done by explicitly focusing on products that meet the company's healthy standard (related to nutrition criteria in its NPS), or by addressing affordability of healthy products relative to products not meeting healthy standards.		
5 	Does the company provide evidence or examples of improving affordability of healthy products that address micronutrient deficiencies in priority populations?	Yes
		No evidence provided
		No information
		Not applicable
Additional information: Please specify the strategy used to make healthy products that address micronutrient deficiencies more affordable, e.g. reduced / set pricing of these products, reduced package sizes, etc. Note: information regarding fortified products not meeting the company's healthy standard will not be considered under this indicator.		
Disclosure		
6	Does the company publicly disclose: (Indicator 2.1)	Clear strategy and / or targets to improve the affordability of healthy products relative to products not meeting healthy standards
	Does the company publicly disclose: (Indicator 2.2)	Clear strategy and / or targets to improve the affordability of products aiming to address micronutrient deficiencies in priority populations
		Not applicable
7	Does the company publicly disclose: (Tick all that apply)	Commentary on or examples of improving the affordability of healthy options in general or for low-income populations (indicator 4)
		Commentary on or examples of improving affordability of healthy products that address micronutrient deficiencies (indicator 5)

C2 Product distribution

Commitment	
Improving physical accessibility of healthy products and products addressing micronutrient deficiencies	
1 	1.1. Has the company made a public commitment to address the physical accessibility of its healthy products for the general consumer and for priority populations accounting for geographical access?
	Clear commitment made for whole business, with particular reference to populations with limited access to nutritious food (i.e. living in food deserts)
	Clear commitment made for whole business without particular reference to populations with limited access to nutritious food (i.e. living in food deserts)
	Broad commitment with particular reference to populations with limited access to nutritious food (i.e. living in food deserts)
	Broad commitment without particular reference to populations with limited access to nutritious food (i.e. living in food deserts)
	No commitment
No information	
<p>Additional information: Clear commitment means a formal, public statement in a policy or other document setting out how the company will ensure physical accessibility and consider it when developing new products, as well as in all key decisions re. placement, distribution etc. The commitment should specifically address the physical accessibility of healthy products, e.g. relative to other products or referring specifically to products meeting the company's healthy criteria. A general commitment to address or improve the accessibility of all products is not sufficient to be credited. The company's own definition of healthy products is considered relevant for this indicator, and throughout Criterion C2. Portion-limited products that do not otherwise meet healthy standards are not considered relevant as healthy products for this indicator and category overall (in general, products or product categories such as confectionery, sugary drinks or ice cream are not considered as healthy products unless there is a specific reason to make an exception).</p> <p>Note: A food desert is an area (either an urban or suburban area, or an isolated rural area) which offers limited access to affordable and nutritious food (especially fresh produce). Usually food deserts are populated by low purchasing-power groups with limited mobility, which makes them less attractive consumers to large supermarkets. Therefore, available food options are often limited to processed foods high in sugar, fat and salt, which if not consumed in moderation can contribute to obesity and diet-related diseases.</p>	
1.2. Has it committed to addressing in its commercial activities the physical accessibility of healthy products designed to address micronutrient deficiencies in priority populations?	Yes No No information Not applicable
<p>Additional information: It is important to address the physical accessibility of fortified or otherwise appropriate products, designed to address micronutrient deficiencies in priority populations.</p> <p>To indicate populations that are at (high) risk of or experiencing malnutrition in all its forms, including undernutrition, micronutrient deficiencies, obesity and diet-related diseases, ATNI uses the overarching term 'priority populations'. More specifically, ATNI defines priority populations as 'those groups that are at (high) risk of or suffering from any form of malnutrition (including undernutrition or any other deficiency, excess or imbalance in a person's intake of energy and/or nutrients), and for which intervention may be reasonably considered to have a substantial impact at the population level.'</p> <p>Under Category C, ATNI specifically observes the following determinants or factors to identify population groups suffering from or at risk of nutrition-related health inequities:</p> <ul style="list-style-type: none"> ■ Socioeconomic factors such as income, which in turn lead to an increased burden of nutrition-related illness or increased risk for adverse nutrition-related health outcome(s) such as micronutrient deficiencies; and ■ Geographical factors (i.e. remote access to supermarkets or food distribution centers), which are physical barriers in accessing nutrition. 	

C2 Product distribution

2 	2.1. Does the company have a clear strategy, and one or more quantitative targets, to specifically improve the physical accessibility of healthy products?	Yes, it has defined a clear strategy AND one or more targets
		Yes, it has defined a clear strategy OR one or more targets
No clear strategy and / or targets		
No information		
<p>Additional information: Specifically improving the physical accessibility of healthy products may be done by explicitly focusing on products that meet the company's healthy standard (related to nutrition criteria in its NPS), or by addressing the physical accessibility of healthy products relative to products not meeting healthy standards.</p> <p>Targets considered for scoring regarding healthy products may include examples such as:</p> <ul style="list-style-type: none"> ■ Number of new consumers of healthy products to reach through improved distribution; ■ Number of priority populations with limited access to nutritious food to reach with healthy and appropriate products through improved distribution; ■ Number of units or sales value targets for healthy products related to extended distribution; ■ Number of new retail partners to achieve extended accessibility goals; ■ Number of consumers to reach with healthy products through improved distribution in 'food deserts'; ■ Investment plans on improving accessibility of healthy products. 		
	2.2. Does the company have a clear strategy, and one or more quantitative targets, to improve the physical accessibility of healthy products designed to address micronutrient deficiencies in priority populations?	Yes, it has a defined clear strategy AND one or more targets
		Yes, it has defined a clear strategy OR one or more targets
		No clear strategy and / or targets
		No information
		Not applicable
<p>Additional information: Targets considered for scoring regarding products addressing micronutrient deficiencies may include:</p> <ul style="list-style-type: none"> ■ Number of new consumers to reach through improved distribution of healthy products aiming to address micronutrient deficiencies; ■ Number of groups experiencing or at high-risk of malnutrition to reach with healthy products aiming to address micronutrient deficiencies through improved distribution; ■ Number of units or sales value targets for healthy products aiming to address micronutrient deficiencies with extended distribution; ■ Number of new retail partners to achieve extended accessibility goals; ■ Number of consumers to reach with healthy products aiming to address micronutrient deficiencies through improved distribution in 'food deserts'; ■ Investment plans on improving accessibility of healthy products aiming to address micronutrient deficiencies. 		
Performance		
Strategies to improve the physical accessibility of healthy products and appropriate products		
3 	Has the company conducted analysis on how to improve the physical accessibility of healthy products for the general consumer and for priority populations accounting for geographical access?	Yes, with specific attention to populations with limited access to nutritious food (i.e. living in food deserts)
		Yes, without specific attention to populations with limited access to nutritious food (i.e. living in food deserts)
		No analysis on physical accessibility has been conducted
		No information
<p>Additional information: This indicator assesses whether areas that lack access to healthy products (i.e. food deserts) are covered in the company's accessibility strategy related to healthy products.</p> <p>Examples that can be considered for scoring include:</p> <ul style="list-style-type: none"> ■ Arrangements / incentives with retailers for prominent shelf positions for its healthy products on a regular basis (not a one-off); ■ 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; ■ Other examples. 		

C2 Product distribution

4 	Does the company provide evidence of specifically improving the physical accessibility of its healthy products?	Yes, with specific attention to populations with limited access to nutritious food (i.e. living in food deserts)
		Yes, without specific attention to populations with limited access to nutritious food (i.e. living in food deserts)
		No evidence of physical accessibility has been provided
		No information
		Not applicable
<p>Additional information: Specifically improving the physical accessibility of its healthy products may be done by explicitly focusing on products that meet the company's healthy standard (related to nutrition criteria in its NPS), or by addressing the physical accessibility of healthy products relative to products not meeting healthy standards.</p> <p>Examples that can be considered for scoring include:</p> <ul style="list-style-type: none"> ■ Arrangements / incentives with retailers for prominent shelf positions for its healthy products on a regular basis (not a one-off); ■ 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; ■ Other examples. 		
5 	5.1. Does the company provide evidence or examples of improving physical accessibility of healthy products that address undernutrition and micronutrient deficiencies through commercial activities?	Yes
		No
		No information
		Not applicable
		<p>Additional information:</p> <p>Examples that can be considered for scoring include:</p> <ul style="list-style-type: none"> ■ Arrangements / incentives with retailers for prominent shelf positions for its healthy products on a regular basis (not a one-off); ■ 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; ■ Other examples. <p>Note: information regarding fortified products not meeting the company's healthy standard will not be considered under this indicator.</p>
5.2. [Supplemental score] Does the company provide evidence or examples of improving the physical accessibility of healthy products that address undernutrition and micronutrient deficiencies, through non-commercial activities? (Tick all that apply)	Yes, providing products to be distributed to undernourished groups	
	Yes, providing products to school feeding programs	
	Yes, by using its distribution systems to deliver micronutrient powders, supplements, etc.	
	Yes, by otherwise supporting programs designed to address undernutrition to reach target groups with appropriate products	
	Not applicable	
<p>Additional information: Non-commercial or philanthropic activities include product donations or providing other types of contributions on a philanthropic basis. Product sales, including at reduced prices or related to governmental programs, should be assessed as commercial activities in indicator 5.1.</p> <p>Note: information regarding fortified products not meeting the company's healthy standard will not be considered under this indicator.</p>		

C2 Product distribution

Disclosure		
6	Does the company publicly disclose: (Indicator 2.1)	Clear strategy and / or targets to improve the physical accessibility of healthy products relative to products not meeting its healthy standards
	Does the company publicly disclose: (Indicator 2.2)	Clear strategy and / or targets to improve the physical accessibility of products designed to address micronutrient deficiencies in priority populations
		Not applicable
7	Does the company publicly disclose: (Tick all that apply)	Commentary on or examples of availability of healthy options in general or for populations with limited access to nutritious food (i.e. living in food deserts) (indicator 4)
		Commentary on or examples to demonstrate its action to improve the accessibility of healthy products that address micronutrient deficiencies (indicator 5)

Section 3 – Influencing consumer choice and behavior

Category D – Responsible marketing policies and auditing of compliance

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 three Criteria:

D1 Marketing policy: general aspects of responsible marketing

D2 Marketing policy: specific arrangements regarding responsible marketing to children and teens¹

D3 Auditing and compliance with policy

This Category carries 20% of the weight of the overall score Corporate Profile methodology.

D1 Marketing policy: general aspects of responsible marketing

Commitment		
Responsible marketing policy commitments		
1 	Does the company have a public responsible marketing policy that applies explicitly to the following media: (Tick all that apply)	All print media (newspapers, magazines, books, and printed advertising in public places)
		All broadcast media (traditional TV, radio)
		All non-broadcast electronic and / or digital media (its own and third party websites, social media, mobile and SMS marketing, native online marketing, games and apps, CDs / DVDs)
		All of in-store or point-of-sales marketing, including packaging
		Sponsorship (e.g. of sporting, entertainment or cultural events or activities)
		All additional forms of marketing (cinema, outdoor, product placement in movies, TV shows, etc.)
<p>Additional information: The channel coverage of the responsible marketing policy (or policies) is assessed in this indicator, whether the policy covers only children, teens or all consumers. If different marketing policies exist for different audiences (for children, teens or all consumers), or for a different reason, differences in channel coverage apply between audiences, only those media are scored that are common to both policies.</p>		

D1 Marketing policy: general aspects of responsible marketing

<p>2</p> 	<p>Does the company's public responsible marketing policy include the following commitments related to the representation of products? (Tick all that apply)</p>	<p>Commits to presenting products in the appropriate portion size and context (and not to condone or encourage excess consumption) (Article 1 of ICC**)</p> <p>All nutritional and health benefit information and claims for food and beverage products should have a sound scientific basis (Art. 9**). 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 4 of ICC**)</p> <p>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**)</p> <p>Commits not to represent food products not intended to be substitutes for meals as such (Article 5 of ICC**)</p> <p>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 9 of ICC**)</p> <p>Commits not to undermine the concept of healthy, balanced diets, or the importance of a healthy, active lifestyle (Article 17 of ICC**)</p> <p>Commits not to use any models with a BMI of under 18.5 (industry best practice)</p> <p>Commits to presenting products in the context of a balanced diet (industry best practice)</p> <p>Additional information: Disclosure needs to be mandatory, therefore the policy needs to be public for the company to score. **International Chamber of Commerce Framework for Responsible Food and Beverage Marketing Communications, 2019, sets forth how general principles of the ICC Advertising and Marketing Communications Code, 2018, which governs all marketing communications, and includes separate sections on sales promotion, sponsorship, direct marketing, digital interactive marketing and environmental marketing, is applied in the context of food and beverage marketing communications. For more information, see: https://cms.iccwbo.org/content/uploads/sites/3/2018/09/icc-advertising-and-marketing-communications-code-int.pdf and https://iccwbo.org/content/uploads/sites/3/2019/08/icc-framework-for-responsible-food-and-beverage-marketing-communications-2019.pdf</p>
<p>3</p> 	<p>For transparency in its marketing activities, does the company commit: (Tick all that apply)</p>	<p>To clearly display the company or brand name when advertising on virtual media</p> <p>To ensure that the true commercial purpose of marketing communications is transparent and recognizable as an advertisement; and to clearly differentiate, by labelling, advertising and content on virtual media, including so-called 'native advertising' (Art. 7, ICC Advertising and Marketing Communications Code, 2018)</p> <p>Additional information: According to Article 7 ICC Advertising and Marketing Communications Code, 2018, "a communication promoting the sale of a product should not be disguised as, for example, market research, consumer surveys, user-generated content, private blogs, private postings on social media or independent reviews."</p>
<p>Assessment of marketing practices to reach priority populations</p>		

D1 Marketing policy: general aspects of responsible marketing

4 	Does the company make an explicit commitment to developing and delivering marketing strategies appropriate to reaching priority populations, in all countries in which it operates?	Yes
		No
		No information
		Not applicable
	Additional information: For companies that are active in developing countries, reaching priority populations with a high burden of undernutrition and micronutrient deficiencies is an essential element of the company's commitment in order to be credited. However, even when considered a priority population group, marketing directly to children should not be considered under this indicator — as marketing policies aimed at children are to be considered in Criterion D2.	
Performance		
5 	Can the company provide evidence of taking steps to understand and reach priority populations, with appropriate products through tailored marketing? (Tick all that apply)	Has done research to generate consumer and marketing insights relating to priority populations
		Has used multiple communication channels and worked with professionals in the communications field (creative agencies, behavioral specialists) to ensure communication is compelling and appropriate to drive desired behavior change of priority populations
		Has conducted evaluations to assess the implementation of the specific marketing measures aimed at priority populations
		Not applicable
	Additional information: For companies that are active in low- and middle-income countries, reaching priority populations with a high burden of undernutrition and micronutrient deficiencies is an essential element of the company's commitment in order to be credited. It is important that products for priority populations are healthy and, if fortified, fortified according to the appropriate guidelines. For this reason, the healthy multiplier is applied in this indicator, as it is based on the assessment in Criterion B3, which addresses both the elements related to (definition of) healthiness and fortification approach.	
Disclosure		
6	Does the company publicly disclose: (Tick all that apply)	Commitment to clearly distinguishing marketing messages from other content (indicator 3)
		Commitment to developing and delivering marketing strategies for healthy and / or appropriate products, appropriate to reaching priority populations (indicator 4)

D2 - Marketing policy: specific arrangements regarding responsible marketing to children and teens³⁴

Commitment		
Responsible marketing policy for children and teens		
1	Does the company have a public policy that addresses responsible marketing to children specifically? (For information only, not scored)	Yes
		No
<p>Additional information: The following documents form the basis for the assessment of responsible marketing to children and teens:</p> <p>The 2010 World Health Organization (WHO) <i>Set of Recommendations on the Marketing of Foods and Non-Alcoholic Beverages to Children</i> (available at https://www.who.int/dietphysicalactivity/publications/recsmarketing/en/) calls for restrictions on marketing to promote better nutrition and contribute to the global objective of ending childhood obesity.</p> <p>The 2018 UNICEF document <i>A Child Rights-Based Approach to Food Marketing: A Guide for Policy Makers</i> (available at https://www.unicef.org/csr/files/A_Child_Rights-Based_Approach_to_Food_Marketing_Report.pdf) offers a legal analysis that links the 2010 WHO recommendations with a human rights framework, particularly the Convention on the Rights of the Child (CRC), and clearly defines that the approach should cover children, including teens, i.e. all persons under the age of 18 years.</p> <p>Furthermore, the ICC Framework for Responsible Food and Beverage Marketing Communications, 2019 (available at https://iccwbo.org/content/uploads/sites/3/2019/08/icc-framework-for-responsible-food-and-beverage-marketing-communications-2019.pdf) provides further guidance on what the ICC Advertising and Marketing Communications Code means when applied to the marketing of foods and beverages. Compared to the earlier 2012 version, the 2019 ICC Framework now includes a focus on children (under the age of 13 year) and teens (13-18 years), as well as an elaboration on the comprehensive scope regarding digital / online mediums and platforms.</p>		
2 	What kind of products does the company advertise to children and / or teens?	No products
		Only products meeting WHO regional standards*
		Only products meeting the company's own or industry association-related standards for marketing to children and / or teens
		No product restriction or all products
		No information
	To which age range does the restriction in advertising apply?	Children and teens below the age of 18
		Children below the age of 12
		Children below the age of 6
		No restriction applied
		No information
<p>Additional information:</p> <p>* Regional Nutrient Profile Models to implement recommendations on the marketing of foods and non-alcoholic beverages to children have been defined by the World Health Organization for all regions (except for Africa as of 22 August 2019, but the publication of that model is pending). Links to descriptions of those models can be found here: https://www.who.int/nutrition/reg_offices/en/</p> <p>The 2018 UNICEF document 'A Child Rights-Based Approach to Food Marketing: A Guide for Policy Makers' (available at https://www.unicef.org/csr/files/A_Child_Rights-Based_Approach_to_Food_Marketing_Report.pdf) offers a legal analysis that links the 2010 WHO <i>Set of Recommendations on the Marketing of Foods and Non-Alcoholic Beverages to Children</i> with a human rights framework, particularly the CRC, and clearly defines that the approach should include all children and teens under the age of 18 years. It also references relevant research that this recommendation is based on.</p>		

³⁴ For this Criterion only, the value of the healthy multiplier (based on the score in Criterion B3) is modified based on the answer options selected in indicator 2.

Marketing techniques and materials aimed at children and teens		
<p>3</p> 	<p>Does the company commit to using responsible marketing techniques aimed at children and / or teens, by: (Tick all that apply)</p>	Not to create a sense of urgency
		Not to use inappropriate price minimization
		Not to exploit a child's imagination in a way that could mislead him / her about the nutritional benefits of the product involved
		Supporting the role of parents or others responsible for guiding diet and lifestyle choices or not to undermine the role of parents or others responsible for guiding diet and lifestyle choices
		Ensuring that marketing materials contain an educative message in relation to healthy diets and lifestyles
		Not to brand merchandise aimed at children except related to healthy products
<p>Additional information: The first three answer options relate directly to Article 18 of the ICC Framework for Responsible Food and Beverage Marketing Communications, 2019. This Article sets forth how general principles of the ICC Advertising and Marketing Communications Code, 2018, are applied in the context of food and beverage marketing communications. The principles of the ICC Advertising and Marketing Communications Code govern all marketing communications, and include separate sections on sales promotion, sponsorship, direct marketing, digital interactive marketing and environmental marketing. For more information, see: https://cms.iccwbo.org/content/uploads/sites/3/2018/09/icc-advertising-and-marketing-communications-code-int.pdf and https://iccwbo.org/content/uploads/sites/3/2019/08/icc-framework-for-responsible-food-and-beverage-marketing-communications-2019.pdf</p> <p>Commitment by companies to 'supporting 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 (industry best practice)' is consistent with the approach to the role of parents (section 3.4, page 46) of the 2018 UNICEF document <i>A Child Rights-Based Approach to Food Marketing: A Guide for Policy Makers</i> (available at https://www.unicef.org/csr/files/A_Child_Rights-Based_Approach_to_Food_Marketing_Report.pdf). In addition, it was included previously in the 2012 version of the ICC Framework for Responsible Food and Beverage Marketing Communications.</p> <p>The last two answer options are industry best practices to ensure responsible marketing to children and / or teens.</p>		
<p>4</p> 	<p>Does the company commit to use children, celebrities (including influencers) or fantasy and animated characters responsibly or not at all? (Tick all that apply)</p>	Commits not to sponsor people, materials or activities popular with children and / or teens at all or except in conjunction with healthy products
		Commits to not depict children on packaging at all or except in conjunction with healthy products
		Pledges not to use celebrities and other people with strong appeal to children and / or teens in marketing of products at all or except in conjunction with healthy products
		Pledges that celebrities or others (including influencers), if used in marketing, will not imply they have achieved their enhanced performance or status through use of the product
		Pledges not to use third-party nor own fantasy and animation characters with a strong appeal to children and/or teens in marketing of products at all or except in conjunction with healthy products, IN ALL FORMS OF MARKETING
		Pledges not to use third-party nor own fantasy and animation characters with a strong appeal to children and/or teens in marketing of products at all or except in conjunction with healthy products, with an exception for point of sale and packaging
<p>Additional information: For this indicator, the last two answer options are mutually exclusive, and therefore, only one of these two options may be selected.</p>		

D2 - Marketing policy: specific arrangements regarding responsible marketing to children and teens³⁴

<p>5</p> 	<p>Regarding responsible use of promotional toys, games, vouchers and competitions; does the company commit to:</p>	<p>Never make use of promotional games, toys, vouchers, competitions etc. in their marketing to children and / or teens</p> <p>Using promotional games, toys, vouchers, competitions etc. only in accordance to WHO regional standards*</p> <p>Using promotional games, toys, vouchers, competitions etc. only in accordance to the company's own or industry association-related standards for marketing to children and / or teens</p> <p>No commitment</p> <p>No information</p> <p>Additional information: * Regional Nutrient Profile Models to implement recommendations on the marketing of foods and non-alcoholic beverages to children have been defined by WHO for all regions (except for Africa as of 22 August 2019, but the publication of that model is pending). Links to descriptions of those models can be found here: https://www.who.int/nutrition/reg_offices/en/.</p>
<p>6</p>	<p>Marketing arrangements in relation to age thresholds</p>	
<p>6.1</p> 	<p>What percentage audience threshold does the company use to restrict its advertising on measured media to avoid inappropriately reaching children and / or teens?</p>	<p><25%</p> <p>26-35%</p> <p>36-50%</p> <p>>50%</p> <p>No audience threshold</p> <p>No information</p> <p>Additional information: Measured media is where audience is audited, which is usually TV.</p> <p>If different thresholds are used for different age ranges, the least strict threshold will be scored (representing the lowest score).</p>
<p>6.2</p> 	<p>To which age range does the restriction in advertising apply?</p>	<p>Children and teens below the age of 18</p> <p>Children below the age of 12</p> <p>Children below the age of 6</p> <p>No restriction</p> <p>No information</p>
<p>7</p>	<p>Digital marketing arrangements related to age thresholds</p>	
<p>7.1</p> 	<p>Does the company utilize tools to ensure that its digital marketing does not reach younger age groups? (Tick all that apply)</p>	<p>Ensuring design of websites / pages / social media / apps is appropriate to adults predominantly, i.e. not designed to attract children and / or teens</p> <p>Age screening prior to logging on / registering (e.g. enter date of birth or require parent to consent)</p> <p>Review of age-related data to determine demographic that is targeted by its digital marketing</p> <p>Ensuring adverts are designed deliberately not to appeal to children and / or teens</p> <p>Nature of third party websites chosen to advertise on (i.e. ages targeted)</p> <p>Additional information: -</p>

D2 - Marketing policy: specific arrangements regarding responsible marketing to children and teens³⁴

<p>7.2</p> 	<p>To which digital media and forms of marketing does the company apply the tools listed above?</p>	<p>All forms** and digital media, including own and third party digital media</p> <p>Only own digital media or limited in another way</p> <p>No separate consideration of how to address 'child audience' for these media</p> <p>No information</p> <p>Additional information: **Digital marketing techniques encompasses the insertion of advertising and other promotions in content that is accessible online and through digital devices. It includes specific types: native advertising, influencer marketing, advergaming and immersive environments, branded environments, viral marketing, location targeting, sponsored search results, neuromarketing and sentiment analysis.</p>
<p>Marketing in or around schools and other educational centers, facilities and premises aimed at children and teens</p>		
<p>8</p> 	<p>To what extent does the company commit to a responsible marketing approach near and in PRIMARY schools (for children up to age 12)?</p>	<p>No marketing or advertising in or near PRIMARY schools</p> <p>No marketing or advertising in PRIMARY schools</p> <p>Only marketing / advertising 'healthy' products in (or near) PRIMARY schools in agreement with schools / parents</p> <p>The company does not commit to this</p> <p>No information</p> <p>Additional information: This indicator refers to any formal school or schooling system that is attended by children up to age 12, however, in countries in which primary or elementary school is attended by children up to age 11, a responsible marketing commitment linked to primary or elementary schools will be credited for this indicator.</p>
<p>9</p> 	<p>To what extent does the company commit to a responsible marketing approach near and in SECONDARY schools (for teens)?</p>	<p>No marketing or advertising in or near SECONDARY schools</p> <p>No marketing or advertising in SECONDARY schools</p> <p>Only marketing / advertising 'healthy' products in (or near) SECONDARY schools in agreement with schools / parents</p> <p>The company does not commit to this</p> <p>No information</p> <p>Additional information: 'Teens' means those individuals aged 13-17 years (ICC 2018). This indicator is only credited for school-related commitments up to and including age 17. For example, U.S. middle school commitments, which typically include individuals up to age 13 or 14, are not considered relevant to be credited in this indicator.</p>
<p>10</p> 	<p>Concerning the form and digital medium of advertisement in schools, does the company: (Tick all that apply)</p>	<p>Extend its commitment explicitly to new media marketing / advertising techniques in or related to schools</p> <p>Include offering 'educational materials' only when in agreement with schools / parents in its commitment</p> <p>Additional information: This indicator applies to commitments linked to primary and / or secondary schools.</p>
<p>11</p> 	<p>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, pediatric services or other health facilities, including sporting or cultural events held at those premises)?</p>	<p>No marketing or advertising in or near these settings</p> <p>No marketing or advertising in these settings</p> <p>Only marketing / advertising 'healthy' products in (or near) these settings in consultation with their management and users</p> <p>No commitment</p> <p>No information</p> <p>Additional information: This indicator relates to Rec. 5, WHO recommendations on the Marketing of Food and Non-Alcoholic Beverages to Children, 2012.</p>

D2 - Marketing policy: specific arrangements regarding responsible marketing to children and teens³⁴

Disclosure		
12	Does the company publish its policy for marketing to children and / or teens in full or does it make the industry Pledge or Initiative that it follows publicly available?	Yes, policy or Pledge that is published in full
		No or policy or Pledge is not published in full

D3 Auditing and compliance with policy

Performance		
Auditing and compliance with policy: all consumers		
1 	Does the company audit its compliance with its policy, including on marketing to children?	Yes, covering all audiences, including children and / or teens
		Yes, but only for children and / or teens
		No audit
		No information
		Additional information: -
2 Assessment of compliance		
2.1 	How is compliance assessed regarding children and / or teens?	The company appoints an independent external auditor (not related to, or in addition to, an industry association-appointed third party auditor)
		By an industry association or an industry association-appointed third party auditor
		The company conducts its own audits
		No audit
		No information
		Additional information: Although an industry association or pledge organization (e.g. International Food and Beverage Alliance, Children's Food and Beverage Advertising Initiative, etc.) may appoint a third party auditor, the first answer option 'the company appoints an independent external auditor' is only credited if a company commissions additional independent auditing to complement industry association or pledge organization auditing, or if it commissions a comprehensive third party compliance audit on an individual basis.
2.2	Does the company assess compliance of all aspects of marketing (covering all audiences)?	Yes, to the same standards that it applies in assessing compliance regarding children and / or teens
		Yes, but to less restrictive standards
		No
		No information
		Additional information: -
3 	How often is the audit undertaken?	Annually, covering all audiences, including children and teens
		Annually, covering children and / or teens only; and less frequently for other audiences
		Less frequently than annually, for any audience covered by the audit
		No
		No information
		Additional information: -

D3 Auditing and compliance with policy

4 	Which forms of advertisement and media (including both traditional and new media) are covered by the audit:	The company audits compliance across all media and in all its forms
		The company audits compliance across main print, traditional and digital media, but with no specific reference to the forms of marketing used
		The company audits compliance across limited selection of media is unclear but there is clear evidence of auditing
		No audit
		No information
Additional information: This indicator assesses the company's level of transparency in its advertisement, in accordance with article 7 of new ICC Code 2018.		
5 	What is the company's individual compliance level for TV and digital marketing? (%)	
5.1	Individual compliance level for TV:	Over 90%
		Less than 90% or no reporting
		No information
5.2	Individual compliance level for digital media:	Over 90%
		Less than 90% or no reporting
		No information
Additional information (5.2): Individual compliance refers to company's non-aggregated compliance level. Digital media refers to social networks i.e. Facebook, Twitter, blogs, YouTube, online newspapers.		
6 	Does the company have a response mechanism to ensure corrective measures are taken regarding any non-compliance with its marketing policy?	A response mechanism for corrective action, if needed
		No response mechanism for corrective action
		No information
Additional information: -		
Disclosure		
7	Does the company publicly disclose information about its audit (indicator 1)?	Yes
		No
8	Disclosure of compliance levels	
8.1	Does the company publicly disclose (indicator 5.1):	Its individual compliance level for TV based on an audit of multiple markets
		Its individual compliance level for TV based on an audit of single market only
		Disclosure of only aggregate industry compliance level
8.2	Does the company publicly disclose (indicator 5.2):	Its individual compliance level for digital media based on an audit of multiple markets
		Its individual compliance level for digital media based on an audit of single market only
		Disclosure of only aggregate industry compliance level

Section 3 – Influencing consumer choice and behavior

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 by offering flexible 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 Supporting employee health and wellness

E2 Supporting breastfeeding mothers at work

E3 Community-supporting healthy eating and active lifestyle programs

This Category carries 2.5% of the weight of the overall score Corporate Profile methodology.

E1 Supporting employee health and wellness

Commitment		
1	Company’s employee health and wellness commitments	
1.1 	Does the company make a public commitment to support employee health and wellness through a program focused on nutrition and physical activity, which includes meaningful expected outcomes? (Tick all that apply)	Yes, with a focus on nutrition, including meaningful expected outcomes Yes, with a focus on nutrition Yes, with a focus on physical activity, including meaningful expected outcomes Yes, with a focus on physical activity
<p>Additional information: A public commitment for this indicator can be a publicly available policy document or public statement regarding the company’s approach to employee health and wellness, or a public description of its employee health and wellness program that includes a focus on nutrition and physical activity. Meaningful expected outcomes can be defined in various ways, e.g. by defining expected outcomes related to healthy behavior, health-related outcomes or outcomes related to employee absenteeism. Outcomes must be quantifiable. At maximum, only two answer options can be selected — one of the first two options, one of the remaining two options.</p>		
1.2 (NEW)	Does the company make a commitment to improve the health and wellness of groups across the food supply chain that are not direct employees (e.g. smallholder farmers, factory workers, small scale vendors) through nutrition-sensitive programs, which includes expected outcomes?	Yes Yes, but it does not include expected outcomes No No information

E1 Supporting employee health and wellness

Additional information: The programs may or may not include a focus on physical activity, but the indicator is assessed on the focus on nutrition, and in relation to the company's own supply chain (i.e. programs addressed to actors in the supply chain that, while not being direct employees, are involved in the company's product development).

In this regard, the [OECD/FAO Guidance for Responsible Agricultural Supply Chains](#) provides a framework of reference for the type of programs to be considered (i.e. it is not necessary for a company to commit to this Guidance in order to get a score in this indicator — this is assessed under Category G). This Guidance has been developed to help enterprises observe existing standards for responsible business conduct along agricultural supply chains. The Guidance targets all enterprises operating along agricultural supply chains, and covers several areas of risk arising along agricultural supply chains are addressed, inter alia, health and safety, and food security and nutrition. This way, it proposes a model enterprise policy outlining the content of existing standards for responsible agricultural supply chains and a five-step framework for due diligence describing the steps that enterprises should follow to identify, assess, mitigate and account for how they address the actual and potential adverse impacts associated with their activities or business relationships.

Particularly in relation to food security and nutrition, the Guidance calls on private sector stakeholders to ensure that their operations contribute to food security and nutrition, and to give attention to enhancing the availability, accessibility, stability and utilization of safe, nutritious and diverse foods. To mitigate the risks associated with food and nutrition security problems in the supply chain, the Guidance suggests measures such as:

- To consider the impacts of operations on the availability and access to food, local employment, dietary preferences and stability of food supply;
- To identify food-related concerns of different stakeholders and evaluate strategies for meeting investment objectives while respecting the food-related concerns of different stakeholders, through consultations with relevant stakeholders;
- To consider contributing to improving access to food and the resilience and nutrition of local populations by: increasing the production of safe, nutritious and diverse foods and promoting the nutritional value of food and agricultural products; facilitating access to inputs, technology, and markets; generating employment (considering living wages) in downstream activities; or setting up community storage facilities to reduce postharvest losses and price volatility.

Performance

Categories of the company's employee health and wellness program

2 	Which of the following elements are included in the company's program(s) across the whole company? Provide examples for each of the relevant options.	A. Policy or organization-level elements
		B. Interpersonal or community-level elements
		C. Individual elements

E1 Supporting employee health and wellness

Additional information:

Opportunities to support employee health and wellness are organized in terms of the Social Ecological Model (SEM). The SEM states that health is affected by lifestyle and behavior choices which are directly and indirectly influenced through different levels of the environment. The health and wellness elements are organized into three levels of environment with examples: (A) Policy and Organization-level (B), Interpersonal and Community-level and (C) Individual-level. [For further discussion of the Social Ecological Model, see Glanz, K., Rimer, B. K., & Viswanath, K. (Eds.). (2008). Health Behavior and Health Education: Theory, Research, and Practice (4th ed.). Jossey-Bass.]

Diet

A. Policy and Organization-level elements

- For staff awards for physical activity and healthy dietary choices
- Health focused orientation welcome pack
- On-site sports teams
- Gyms on work sites
- Availability and / or affordability of 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

B. Interpersonal and Community-level elements

- Lunchtime / worktime walking or exercise clubs
- Active participation in sports challenges
- Seminars on nutrition, diets, etc.
- Cooking master classes focused on healthy options
- Nutrition campaigns regularly throughout work sites
- Physical activity campaigns regularly throughout work sites
- Encouragement to use stairs, not elevators, etc.
- Encouragement / facilities to walk / bike to work
- Links to local fresh food markets or similar
- Subsidies for gym memberships off site

C. Individual elements

- Newsletter highlighting recipes, employee stories of successes and challenges;
- Nutrition counseling or personalized nutrition with a registered dietitian to plan meals, read nutrition labels and learn money-saving tips at the supermarket;
- Work-life balance counseling for time management, planning for physical activity, stress management and coping skills with a certified counselor;
- Personalized exercise plans with a personal exercise trainer.

In case the company offers multiple programs or program variants in different locations or geographies, the common elements across those programs are scored in this indicator, aligned with the geographic multiplier that is applied.

3 Availability of the company's health and wellness program

3.1


To whom is the company's health and wellness program available (across the whole company and all operations)?

- The program is available to all employees
- The program is available to some employees
- The company does not offer a health and wellness program
- No information

Additional information: Note: this indicator assesses the health and wellness program(s) considered under indicator 2. The availability to employees and family members is assessed within the geographic scope of the program. However, the geographic scope of the program is considered under the geographic multiplier.

3.2


Is the company's program also available for family members?

- The program is available to all employees' family members
- The program is available to some employees' family members
- The program is not available to family members

Additional information: -



E1 Supporting employee health and wellness

Assessment of the impact of the company's health and wellness programs		
4	Has the company evaluated the impact of the nutrition and physical activity elements of its health and wellness programs within the last three years?	Independent evaluations undertaken for at least one site (taking into account employee privacy and rights)
		Company performed its own evaluations for at least one site (taking into account employee privacy and rights)
		No evaluations
		No information
Additional information: This indicator assesses the impact evaluation of employee health and wellness programs. It is mandatory for this indicator to be credited that the impact of the health and wellness program, which includes nutrition and physical activity elements, is evaluated at the group or program level. It is not sufficient to measure parameters on an individual level only (e.g. body weight, daily steps, blood parameters) without assessing the impact on the program level.		
Disclosure		
5	Does the company publicly disclose: (Tick all that apply)	Commitment to support health and wellness of groups across the food supply chain beyond direct employees (indicator 1.2)
		A description of the common elements that are included in the company's program(s) across the whole company (indicator 2)
		Statement on the availability of the health and wellness program to employees and / or family members (indicator 3)
6	Does the company disclose evaluations of any of the nutrition, diet and activity elements of its health and wellness program? (Indicator 4)	Full evaluation
		Summary evaluation
		No disclosure
		No information

E2 Supporting breastfeeding mothers at work

Commitment		
1 	Does the company publicly commit to allowing parents to take paid parental leave, and to providing breastfeeding mothers with appropriate working conditions and facilities at work?	Formally commits to both granting paid parental leave, and to providing appropriate working conditions and facilities to facilitate breastfeeding
		Has one formal commitment in place
		The company makes at least one commitment, but has no formal policy
		No commitment
		No information
Additional information: -		
Performance		

E2 Supporting breastfeeding mothers at work

2 	Does the company's parental policy allow parents to take paid parental leave?	26 weeks or more
		Between 14 and 26 weeks
		14 weeks, in line with International Labour Organization (ILO) recommendation
		Between 8 and 14 weeks
		No policy
		No information
<p>Additional information: Minimum legal requirements regarding paid parental leave vary widely between countries. According to Article 4(1) of ILO's Maternity Protection Convention, "a woman to whom this Convention applies shall be entitled to a period of maternity leave of not less than 14 weeks." (C183 — Maternity Protection Convention, 2000 (No. 183)). To optimally support mothers to breastfeed exclusively for the first six months according to WHO recommendations (see https://www.who.int/nutrition/topics/exclusive_breastfeeding/en/ for more information) paid leave of 26 weeks or more is recommended. Companies are encouraged to establish a policy that goes beyond legal minimums and which defines a minimum arrangement across the markets they operate in (of course allowing for longer paid leave where legally required).</p>		
3 Company's provision of facilities to support breastfeeding mothers		
3.1. 	Does the company:	Provide private, hygienic, safe rooms for expressing breastmilk?
		Yes
		No
		No information
		Provide fridges for storing expressed breastmilk?
		Yes
		No
		No information
		Allow breastfeeding mothers breaks to express breastmilk?
		Yes
		No
		No information
Offer other functional or flexible working arrangements to support breastfeeding mothers?		
Yes		
No		
No information		
<p>Additional information: Other functional arrangements include other facilities at the workplace to help mothers express and / or breastfeed.</p>		
3.2. (NEW) 	Does the company offer these facilities:	In all its locations with 50 or more employees
		In some of its locations
		The company does not offer facilities to breastfeeding mothers
		No information
		Additional information: -
Disclosure		
4	Does the company publicly disclose its policy on supporting breastfeeding mothers? (indicator 1)	Yes
		No
5	Does the company publish a commentary about how it supports breastfeeding mothers within the workplace? (indicator 3)	Yes
		No

E3 Community-supporting healthy eating and active lifestyle programs

Commitment		
Company's programs aimed at supporting consumers' healthy lifestyles		
1 	1.1. For nutrition literacy and education, healthy diet-oriented, and active lifestyle programs, does the company:	Commit to, or demonstrate, that all programs exclude product or brand level branding
		Commit to, or demonstrate, that some of its programs exclude product or brand-level branding
		No
		No information
	1.2. For nutrition literacy and education, healthy diet-oriented, and active lifestyle programs, does the company:	Commit to, or demonstrate, that all programs are evidence-based and aligned with relevant national or international guidelines
		Commit to, or demonstrate, that some of its programs are evidence-based and aligned with relevant national or international guidelines
		No
		No information
<p>Additional information: Nutrition literacy may be defined as “the degree to which individuals have the capacity to obtain, process, and understand nutrition information and skills needed in order to make appropriate nutrition decisions.” (D Gibbs, et al., 2018).</p> <p>In order for this indicator to be credited, a policy document or similar statement regarding the company's approach to nutrition literacy and education, healthy diet-oriented, and active lifestyle programs is relevant but evidence (or a description) of all relevant programs about the branding approach, evidence base and / or alignment with national or international guidelines is accepted as well.</p>		
Performance		
2 	For nutrition education / nutrition literacy / healthy diet-oriented / active lifestyle programs, what types of programs does the company offer / sponsor / fund?	Only those designed by and / or (co)implemented with diverse stakeholder groups with relevant expertise
		Evidence of some programs designed by or (co)implemented with stakeholder groups with relevant expertise
		Only its own programs
		No relevant information
	<p>Additional information: We credit both evidences based on implemented programs as well as a policy or strategy showing this is the case.</p>	
3 	For nutrition education / nutrition literacy / healthy diet-oriented / active lifestyle programs that aim to reach priority populations, does the company support or fund programs that are adapted to the specific needs, background and level of nutrition literacy of these groups?	Yes, and these adapted programs have been designed by and / or (co)implemented with groups with relevant expertise and strong leadership in the process
		Yes, and some of these adapted programs have been designed by and / or (co)implemented with groups with relevant expertise and strong leadership in the process
		Company only offers own programs
		No information
	<p>Not applicable (i.e. this indicator is not relevant as no priority populations are reached)</p>	
Additional information: -		

E3 Community-supporting healthy eating and active lifestyle programs

4 	For nutrition education / nutrition literacy / healthy diet-oriented / active lifestyle programs, how does the company evaluate the outcomes of the programs?	All programs are evaluated by independent groups with relevant expertise (i.e. third party evaluation)
		Some programs are evaluated by independent groups with relevant expertise (i.e. third party evaluation)
		Evaluated by the company itself (i.e. first party or internal evaluation)
		No evaluations are performed
		No relevant information
Additional information: -		
Disclosure		
5	Does the company publicly disclose: (Tick all that apply)	Document that sets out its policy on brand-level branding (indicator 1.1)
		Commitment that its programs are evidence-based and aligned with relevant national or international guidelines (indicator 1.2)
6	Does the company publicly disclose: (Tick all that apply)	A description of the nutrition education / nutrition literacy / healthy diet-oriented / active lifestyle programs (indicator 2)
		A description of the nutrition education / nutrition literacy / healthy diet-oriented / active lifestyle programs aimed at reaching priority populations (indicator 3)
7	Does the company publicly disclose: (indicator 4)	All the independent evaluations carried out for the programs it supports
		Some of the independent evaluations carried out for the programs it supports
		No relevant information about independent evaluations

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 easily understandable information on pack 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.

This Category assesses companies' approaches to product labelling 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 consistency with international standards. This assessment is divided into two Criteria:

F1 Product labelling

F2 Health and nutrition claims

This Category carries 2.5% of the weight of the overall score Corporate Profile methodology.

F1 Product labelling		
Commitment		
Nutritional information disclosure		
1 	Does the company publicly commit to disclose nutrition information on its products?	Back-Of-Pack and Front-Of-Pack
		Back-Of-Pack only
		No commitment
		No information
<p>Additional information: Legal requirements for Back-Of-Pack and Front-Of-Pack labelling vary widely between countries. This indicator assesses whether companies have a policy on providing Back-Of-Pack and Front-Of-Pack nutrition information, ideally defined as a consistent, global approach (wherever legally allowed and accommodating for specific local regulation).</p> <p>Any type of Front-Of-Pack commitment that applies globally (e.g. to show % Guideline Daily Amount (GDA) information), or a commitment to display interpretive Front-Of-Pack labelling wherever voluntary government-endorsed systems exist, will be credited for this indicator's first answer option, provided a Back-Of-Pack commitment is in place as well.</p>		
Commitments for Back-Of-Pack labelling		
2 	Does the company publicly commit to provide Back-Of-Pack nutrition information on key relevant nutrients? (Tick all that apply)	All nutrients according to Codex Alimentarius Guidelines CAC/GL 2-1985 (i.e. energy value, protein, total carbohydrates, total sugars, total fat, saturated fat, sodium)
		Added sugars
		Dietary fiber
<p>Additional information: Listing of nutrients according to Article 3(2) of Codex Alimentarius Guidelines on Nutrition Labelling, CAC/GL 2-1985, last modified on 2017.</p> <p>In case that following the above-mentioned answer, options would differ from specific national requirements as established per law in one of the markets in which a company operates, ATNI acknowledges that this commitment cannot apply. Therefore, the commitment would apply to all other markets.</p>		

F1 Product labelling

3	Commitments for Front-Of-Pack labelling	
3.1 	Does the company also commit to providing information on Front-Of-Pack?	In an interpretative format that is government-endorsed (where available) on ALL relevant products, providing indicators of how healthy the product is, rather than just numeric information
		In an interpretative format that is government-endorsed (where available) on SOME relevant products, providing indicators of how healthy the product is, rather than just numeric information
		Numeric information only, but showing % of GDA (or similar measure) of multiple nutrients
		Numeric information only, but showing % of GDA (or similar measure) of a single nutrient or energy only
		Numeric information on levels of key nutrients, but not showing % GDA (or similar measure)
		No Front-Of-Pack labelling used
		No information
<p>Additional information: Interpretative format means using colors or symbols or other graphics to help consumers to understand the information. Government-endorsed interpretative Front-Of-Pack labelling that are assessed in indicator 3.1 refer to voluntary Front-Of-Pack labelling systems that are legally allowed and supported by government or other authorities in the country or jurisdiction. Mandatory Front-Of-Pack labelling systems are not relevant in indicator 3.1.</p>		
3.2	For countries in which mandatory Front-Of-Pack labelling systems are implemented, including health warning labels, does the company commit:	Not to provide additional interpretive labelling or other information Front-Of-Pack that directly relates to the message of the mandatory Front-Of-Pack labelling (which may confuse consumers or modify the effect of the mandatory labelling)
		No commitment
		Not applicable
<p>Additional information: Examples of Front-Of-Pack labelling or nutrition information have been observed in markets with mandatory health warning labels, in which case food and beverage companies added information Front-Of-Pack that undermined the message of the health warning. Indicator 3.2 assesses whether companies commit to not provide Front-Of-Pack information in that way.</p> <p>Countries with mandatory Front-Of-Pack labelling systems are: Chile, Ecuador, Finland, Iran, Israel Mexico, Peru, Sri Lanka, Thailand, Uruguay (as of May 2020). For more information, see: Jones A, Neal B, Reeve B, et al. (2019) 'Front-of-pack nutrition labelling to promote healthier diets: current practice and opportunities to strengthen regulation worldwide.' <i>BMJ Global Health</i> 2019;4:e001882; and S Storcksdieck genannt Bonsmann, G Marandola, E Ciriolo, R van Bavel, J Wollgast. (2020) Front-of-pack nutrition labelling schemes: a comprehensive review. EUR 29811 EN, Luxembourg, Publications Office of the European Union.</p>		
<p>Additional labelling commitments</p>		
4 	Does the company commit to providing Back-Of-Pack information on the quantity of nutrients as a percentage of the GDAs (or similar measure)?	Yes, for all applicable nutrients and energy
		Yes, for a selection of nutrients or energy only
		No commitment
		No information
<p>Additional information: -</p>		

F1 Product labelling

Assessment of portion / serving size labelling		
5	Does the company commit to providing nutritional information on a per 100 g or per 100 ml basis, and to providing portion- or serving-based information (Article 3.4 of Codex Alimentarius CAC/GL 2-1985)? (Tick all that apply)	Information on the amounts of energy and nutrients is expressed in g per 100 g or per 100 ml or per package if the package contains only a single portion
		Information on the amounts of energy and nutrients is expressed per serving as quantified on the label or per portion provided that the number of portions contained in the package is stated
Additional information: This indicator assesses commitments regarding the information on the amounts of energy and nutrients according to Article 3.4.2, 3.4.3 and of Codex Alimentarius Guidelines on Nutrition Labelling , CAC/GL 2-1985, last modified on 2017.		
6	Has the company defined a labelling strategy and targets aimed at reducing food waste?	Yes, a labelling strategy AND targets aimed at reducing food waste are defined
		Yes, either a labelling strategy OR targets aimed at reducing food waste are defined
		No strategy or targets
		No information
		Not applicable
Additional information: This indicator assesses whether companies are aware of the impact that best-by dates or other labelling aspects have on people's consumption patterns, and whether they're addressing it.		
Performance		
Roll-out of full labelling commitments: market coverage		
7	In what percentage of the company's markets has it rolled out its full labelling commitments, i.e. all products in those markets are labelled according to the commitments?	
7.1	In what percentage of markets has the company rolled out its Back-Of-Pack labelling commitments that comply (at minimum) with Codex Alimentarius on Nutrition and Labelling CAC/GL 2-1985, last modified 2017?	More than 80% (or more than 98% of products globally)
		Between 50 and 79% (or more than 90% of products globally)
		Between 6 and 49% (or more than 80% of products globally)
		Less than 5% (or less than 79% of products globally)
		No Back-Of-Pack labelling commitment in place
		No information
Additional information: This performance indicator is related to the commitments assessed under indicator 2, above.		

F1 Product labelling

7.2	<p>In what percentage of relevant markets has the company rolled out its full Front-Of-Pack labelling commitments, i.e. all products (95% or more) in those markets are labelled according to the commitments?</p>	<p>More than 80% (or more than 98% of products globally)</p> <p>Between 50 and 79% (or more than 90% of products globally)</p> <p>Between 6 and 49% (or more than 80% of products globally)</p> <p>Less than 5% (or less than 79% of products globally)</p> <p>No Front-Of-Pack labelling commitment in place</p> <p>No information</p> <p>Additional information: This indicator assesses labelling implementation per market (country), however, if companies only register labelling roll-out per product (on SKU level), that can be scored as well as indicated in the answer options. Product volume information is not considered relevant for this assessment, as labelling is arranged on the level of single products (SKUs).</p> <p>For indicator 7.2, assessing the roll-out of Front-Of-Pack labelling commitments and depending on the type of commitment of the company, only those countries are taken into account for the calculation of the percentage of roll-out that have government-endorsed interpretive Front-Of-Pack labelling systems (in case companies commit to using interpretive Front-Of-Pack labelling in countries where government-endorsed model are available).</p> <p>This performance indicator is related to the commitments assessed under indicator 3, above. For the list of countries with mandatory Front-Of-Pack labelling systems, see the additional information button linked to indicator 3.2.</p>
<p>8</p> 	<p>For what percentage of products does the company provide nutrition information online, accounting for country-specific differences in product compositions?</p>	<p>For 90% or more of products</p> <p>For between 50 and 90% of products</p> <p>For between 10 and 49% of products</p> <p>For less than 10% of products</p> <p>No nutrition information published</p> <p>No information</p> <p>Additional information: This indicator assesses for how many products the company provides nutrition information online, taking into account country-specific differences in product composition. Therefore, country-specific access to nutrition information online needs to be available, or other assurance of accuracy of information in all markets the company is active in. To check for this specifically, the geographic multiplier applies to this indicator, to check whether nutrition information is online for the various markets the company is active in.</p>
9	<p>Does the company provide examples of labelling-related measures taken to reduce food waste (beyond regulatory requirements)?</p>	<p>Yes</p> <p>No</p> <p>No information</p> <p>Additional information: Companies should here specify their initiatives (e.g. related to best-by dates of products, which are regulated differently in each territory, but offer quite some margin to companies to shorten them) to address the problem of food waste.</p>
Disclosure		
10	<p>Does the company publicly disclose: (Tick all that apply)</p>	<p>Its commitments on Back-Of-Pack labelling of nutrients (indicator 2)</p> <p>Its commitments on Front-Of-Pack nutrition labelling (indicator 3)</p>
11	<p>Does the company publicly disclose: (Tick all that apply)</p>	<p>Commitment to labelling amounts of energy or nutrients on a per 100 g or per 100 ml basis and / or per serving or per portion size (indicator 5)</p> <p>A commentary or technical information about its labelling strategy and targets aimed at reducing food waste (indicator 6)</p>

F1 Product labelling

12	Does the company publicly disclose: (Indicator 7)	The percentages of roll-out per market or by product globally of its Back-Of-Pack and Front-Of-Pack labelling commitments
		A general description or semi-quantitative indication of which markets it has applied its Back-Of-Pack and / or Front-Of-Pack labelling commitments to

F2 Health and nutrition claims

Commitment		
Health and nutrition claims and compliance with the Codex Alimentarius Guidelines		
1 	1.1. Does the company state that, for countries where no national regulatory system exists or where the local / national regulation is less strict than Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, it will not place a health claim on a product unless it complies with the latter?	Yes, or the company commits to not using any health claims No No information The company only commits to comply with Codex Alimentarius Guidelines for Use of Health Claims in countries where no national regulatory system exists
	1.2. Does the company state that it will not place a health claim on a product unless it is healthy, as defined in a relevant Nutrient Profiling System (NPS)?	Yes, only when it meets the nutrition criteria of a government-endorsed NPS Yes, only when it meets the nutrition criteria of its formal internal NPS Yes, only when it meets the nutrition criteria of its own precursor to an NPS (or similar) No No information
<p>Additional information: Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997, last modified on 2013. It defines nutrition and health claims as follows: “Nutrition claim means any representation which states, suggests or implies that a food has particular nutritional properties including but not limited to the energy value and to the content of protein, fat and carbohydrates, as well as the content of vitamins and minerals. The following do not constitute nutrition claims: (a) the mention of substances in the list of ingredients; (b) the mention of nutrients as a mandatory part of nutrition labelling; (c) quantitative or qualitative declaration of certain nutrients or ingredients on the label if required by national legislation.</p> <p>Health claim means any representation that states, suggests, or implies that a relationship exists between a food or a constituent of that food and health.”</p> <p>An example of a government-endorsed NPS aiming to determine whether a product is suitable to carry a nutrition or health claim is the Australian FSANZ NPSC model (see http://www.foodstandards.gov.au/industry/labelling/Pages/Consumer-guide-to-NPSC.aspx for more information). ATNI considers products with a Health Star Rating of 3.5 or higher, or a Nutri-Score A or B, as equivalent, or company’s own NPS that has been benchmarked objectively against these systems and threshold values and shown to be equivalent. For other NPS used by companies, the second answer option will be credited.</p>		

F2 Health and nutrition claims

2	 <p>Does the company state that, for countries where there is no regulation of nutrition claims or where the local / national regulation is less strict than Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, it will not place a nutrition claim on a product unless that claim complies with the latter?</p>	Yes, or the company commits to not using any nutrition claims
		No
	<p>Does the company state that it will not place a nutrition claim on a product unless it is healthy, as defined in a relevant Nutrient Profiling Monitor (NPM)?</p>	No information
		The company only commits to comply with Codex Alimentarius Guidelines for Use of Nutrition Claims in countries where no national regulatory system exists
		Yes, only when it meets the nutrition criteria of a government-endorsed NPM
		Yes, only when it meets the nutrition criteria of its formal internal NPM
		Yes, only when it meets the nutrition criteria of its own precursor to an NPM (or similar)
		No
<p>Additional information: Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997, last modified on 2013.</p> <p>An example of a government-endorsed NPM aiming to determine whether a product is suitable to carry a nutrition or health claim is the Australian FSANZ NPSC model (see http://www.foodstandards.gov.au/industry/labelling/Pages/Consumer-guide-to-NPSC.aspx for more information). ATNI considers products with a Health Star Rating of 3.5 or higher, or a Nutri-Score A or B, as equivalent, or company's own NPM that has been benchmarked objectively against these systems and threshold values and shown to be equivalent. For other NPM used by companies, the second answer option will be credited.</p>		No information
<p>Health and nutrition claims (focus: fortification)</p>		
3	 <p>Does the company commit to using nutrition or health claims on products that have been fortified ONLY when they meet relevant Codex standards and the WHO/FAO Guidelines on Food Fortification with Micronutrients (see <i>Additional information</i> for specific reference)?</p>	Yes
		No
	<p>Additional information: Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997, last modified on 2013; and WHO/FAO Guidelines on Food Fortification with Micronutrients: https://www.who.int/nutrition/publications/micronutrients/9241594012/en/</p> <p>For this indicator to be scored, both guidelines should be followed, or it should be clear that the company approach is equivalent.</p> <p>Note: within the General Principles for the Addition of Essential Nutrients to Foods, CAC/GL 9-1987, last revised on 2015, it is stated that "3.2.5 When competent national and / or regional authorities establish minimum amounts for the addition of essential nutrients to foods they should ensure that these amounts are significant and in line with the intended purpose as identified in 3.1.1. In determining significant amounts, they may also consider conditions of use for a 'source' claim in the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)." Therefore, the use of nutrition or health claims on fortified products is still determined by the Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997.</p>	No information
		Not applicable
<p>Disclosure</p>		
4	<p>Does the company publicly disclose: (Tick all that apply)</p>	Its commitment for using health claims only on products that comply with Codex (CAC/GL 23-1997) or not using any health claims (indicator 1.1)
		Its commitment for using nutrition claims only on products that comply with Codex (CAC/GL 23-1997) or not using any nutrition claims (indicator 2.1)
5	<p>Does the company publicly disclose: (Indicator 3)</p>	Its commitment / policy about using nutrition and health claims on fortified products
		Not applicable

Section 3 – Influencing consumer choice and behavior

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 and partnerships

This Category carries 5% of the weight of the overall score Corporate Profile methodology.

G1 Lobbying and influencing governments and policymakers		
Commitment		
Legitimacy of lobbying		
1 	1.1. Does the company publicly commit to the following through a lobbying policy or code of conduct: (Tick all that apply)	Only engaging with governments, political parties, policymakers and policymaking bodies in support of measures to improve health and nutrition, consistent with the public interest
		Only engaging in lobbying activities that support an evidence-based approach to policymaking, with the emphasis on independent, peer-reviewed science
		Measures preventing bribery and corruption in its relations with public officials, including the offering and receiving of gifts, hospitality or other financial and in-kind incentives
		Ensuring that its lobbying activities respect public policy / human rights frameworks developed by international agencies, national and / or sub-national governments, and standard-setting bodies
	1.2. Do the commitments explicitly cover all intermediate lobbying conducted by third parties paid or unpaid by the company?	Yes No
Additional information: Only commitments / statements (not actions) will be taken into consideration.		
Playing an active, constructive role to address malnutrition		
2 	Does the company commit to play an active and constructive part in supporting governments' efforts to combat all forms of malnutrition?	Yes No No information
	Additional information:-	

G1 Lobbying and influencing governments and policymakers

Performance		
Supporting governments to address malnutrition		
3	Does the company provide examples of playing an active and constructive role in supporting governments' efforts to combat all forms of malnutrition?	Yes, showing examples relating to three or more countries
		Yes, showing an examples relating to one or two countries
		No
		No information
Additional information: Examples can cover efforts to address undernutrition and micronutrient deficiencies, e.g. supporting the government to require fortification of staples, to reduce tariffs on imported fortified staples, to require manufacturers to use fortified staples etc., as well as efforts to address obesity and diet-related diseases.		
4	Does the company have mechanisms in place to arrange the following:	Board oversight of lobbying policy positions, processes and practices, including third parties?
		Internal or independent audits of the company's lobbying activities, including third parties?
		An internal whistleblowing mechanism that covers the company's lobbying policy and / or code of conduct
Disclosure		
Disclosure of aspects related to lobbying / influencing		
5 	Does the company publicly disclose: (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 organizations
		Its spending on lobbying (including third party costs) and political donations (or state none are made)
		Any potential governance conflicts of interest (or state that none exist)
		Board seats at industry associations and on advisory bodies related to nutrition issues
Additional information: -		
6	Publication of company lobbying activities	
6.1	Does the company publicly disclose: (Tick all that apply)	A commentary or make other disclosures on its lobbying measures to prevent and address all forms of malnutrition
		A narrative about the role played in supporting government efforts to combat all forms of malnutrition
Additional information: -		
6.2 	Does the company publicly disclose its positions taken on national and international public policy frameworks used in lobbying / governmental engagement activities in the last 3 years, on the following: (Tick all that apply)	Health and nutrition claims / regulatory development
		Front-Of-Pack labelling
		Fiscal instruments related to nutrition (e.g. sugar taxes or subsidies for fortified products)
		Other policies (new proposals, reforms, renewals, reauthorizations) related to nutrition
		Marketing to children
Additional information: A company's public policy position is the position that it takes when engaging with policymakers, which may be distinct from its commercial policy on these topics (and therefore the latter does not suffice to be credited). Only topics that are used in actual lobbying activities are considered relevant.		

G2 Stakeholder engagement and partnerships

Performance		
1 	Does the company provide evidence of engaging with the following stakeholders in developing its nutrition strategy, policies and / or programs: (Tick all that apply)	International organizations (such as UN agencies) or regional institutions
		National bodies and institutions
		CSOs, including NGOs
		Academic institutions or scientific experts
		Other
<p>Additional information: An essential element in order for stakeholder engagement to be credited for this indicator, and throughout Criterion G2 (unless stated otherwise), is that stakeholder engagement should be focused on, or include an element of, gathering input from stakeholders to develop or improve the company's nutrition strategy, policies and programs. Engaging with stakeholders to explain or educate them on company programs, initiatives or approaches is not sufficient if the focus is only on providing information and not on receiving input or feedback.</p> <p>Global Reporting Initiative (GRI) G4 guidelines defines stakeholders as follows: "According to GRI, stakeholders are defined as entities or individuals that can reasonably be expected to be significantly affected by the organisation's activities, products, and services; and whose actions can reasonably be expected to affect the ability of the organisation to successfully implement its strategies and achieve its objectives" (see for more information: www2.globalreporting.org/standards/g4/Pages/default.aspx)</p> <p>ATNI defines stakeholder engagement as the process by which the company involves individuals, entities, organizations, etc. who may be affected by its decisions / actions or who can influence these decisions. That individual / entity/ organization may support or oppose, hold influence in the company or outside of it, hold relevant official positions or may be affected in the long term via a non-paid relationship.</p> <p>Further, consumer organizations or priority population-related associations or platforms are considered as examples of CSOs, and defined "to include all non-market and non-state organizations outside of the family in which people organize themselves to pursue shared interests in the public domain" (UNDP, 2015, "NGOs and CSOs: A note on terminology"). However, all forms of marketing, market research or marketing-related consumer insights research that involve engagement with these groups, or such engagement with (groups of) consumers, should not be considered under this indicator. Only engagement for the purpose of gathering input to develop the company's nutrition strategy, policies and / or programs; or identifying and assessing any actual or potential adverse impacts to the realization of their right to adequate food resulting from business activity should be considered (following the UN Guiding Principles on Business and Human Rights, principle 18).</p>		
2	What form of engagement designed to improve or develop its nutrition strategy, policies or programs does the company have with stakeholders as evidenced by examples provided by the company?	Comprehensive, well-structured and focused engagement on business strategy and performance; with both international and local stakeholders
		Comprehensive, well-structured and focused engagement on business strategy and performance; with (local) home country stakeholders
		Limited; typically, one-way communication rather than engagement, and more ad-hoc; with either international or local stakeholders
		No engagement
		No information
		<p>Additional information: Stakeholder engagement refers to the process by which the company involves individuals, entities, organizations, etc. who may be affected by its decisions / actions or can influence these. For more information, please see the additional information under indicator 1, above.</p>

G2 Stakeholder engagement and partnerships

3	Does the company seek specialist external experts' advice on how it should design its strategies, policies and programs to prevent and address:	
	3.1. Obesity and diet-related chronic diseases on a strategic / Board level?	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 or input from individual experts with relevant area of expertise
		No external input sought / no information
	3.2. Undernutrition and micronutrient deficiencies on a strategic / Board level?	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 or input from individual experts with relevant area of expertise
		No external input sought / no information
		Not applicable
<p>Additional information: 'External experts' refers to an advisory panel / expert group with broad range of expertise, including in the field of labelling, marketing etc.</p> <p>This indicator considers both paid and non-paid expert engagement.</p>		
<p>Adherence to international codes related to responsible engagement with stakeholders in the food supply chain</p>		
4	Has the company publicly adhered to the following international codes of conduct: (Tick all that apply)	UN Guiding Principles on Business and Human Rights
		Code of Ethics for International Trade in Food, adopted by the Codex Alimentarius
		2016 FAO / OECD Guidance for Responsible Agricultural Supply Chains
		Guiding Principles on Human Rights Impact Assessments of Trade and Investment Agreements
		Principles for Responsible Investments in Agriculture and Food Systems
		OECD Guidelines for Multinational Enterprises / OECD Due Diligence Guidance for Responsible Business Conduct
		ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration)
		UN Global Compact
	Does the company provide evidence of taking action in relation to such international voluntary codes of conduct?	The company has provided examples related to three codes or more
		The company has provided examples of one or two codes
No examples provided		

Additional information: In assessing this indicator, companies will be credited if they make an explicit reference to the international codes of conduct in their reporting, initiatives or other (internal or public) documentation. Implicit references to codes of conduct, or of action taken in relation to such codes, is only credited if the link to the code(s) of conduct is clear and unambiguous. The codes of conduct are described below:

The **UN Guiding Principles on Business and Human Rights** (2011) are a set of guidelines that apply to States and companies to prevent, address and remedy human rights abuses committed in business operations. This instrument consists of 31 principles around the obligations to respect and protect human rights, as well as to remedy human rights abuses when these occur. Endorsed in 2011, the Guiding Principles provided the first global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity, and continue to provide the internationally accepted framework for enhancing standards and practice regarding business and human rights.

The **Code of Ethics for International Trade in Food** (Codex Alimentarius Code of Practice, CAC/RCP 20-1979, revised in 2010) aims to establish principles for the ethical conduct of international trade in food in order to protect the health of the consumers and ensure fair practices in the food trade, as per its article 1.

Likewise, 2016 **FAO/OECD Guidance for Responsible Agricultural Supply Chains** is a compilation of existing standards for responsible business conduct along supply chains developed to help companies observe such principles in order to mitigate adverse impacts and promote sustainable development. The Guidance — aimed at all enterprises, foreign and domestic, operating at all phases of the food supply chain — addresses several areas of risk, including respect for human rights, health and safety, food security and malnutrition, land rights and sustainable use of natural resources. It results from the understanding that enterprises operating along agricultural food supply chains can and have a responsibility to play a significant role in strengthening sustainable development, enhancing food and nutritional security (directly and indirectly) and helping achieve development goals of third countries. All of which is connected to the reduction of FLW.

The **Guiding Principles on Human Rights Impact Assessments of Trade and Investment Agreements** (2011) are intended to provide States with guidance on how best to ensure that the trade and investment agreements they conclude are consistent with their obligations under international human rights instruments. In addition, these guiding principles could serve as a source of inspiration for companies carrying out human rights due diligence, in order to identify, prevent, mitigate and account for the human rights impacts of their activities, particularly with regards to the right to adequate food, in the negotiation and conclusion of investment agreements with the host States in which they invest.

The **Principles for Responsible Investments in Agriculture and Food Systems** (2014) aim to promote responsible investment in agriculture and food systems that contribute to food security and nutrition, thus supporting the progressive realization of the right to adequate food in the context of national food security. The document seeks to address the core elements of what makes investment in agriculture and food systems responsible, and serves as a framework to guide the actions of all stakeholders engaged in agriculture and food systems (including business enterprises) by defining principles which can promote much needed responsible investment, enhance livelihoods, and guard against and mitigate risks to food security and nutrition.

OECD Guidelines for Multinational Enterprises (1976, updated in 2011) are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognized standards. The OECD Guidelines recommend that enterprises conduct due diligence in order to identify, prevent or mitigate and account for how actual and potential adverse impacts are addressed. Additionally, the [OECD Due Diligence Guidance for Responsible Business Conduct](#) (adopted in 2018) provides practical support to enterprises on the implementation of the OECD Guidelines for Multinational Enterprises by providing plain language explanations of its due diligence recommendations and associated provisions.

The **ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy** (MNE Declaration) offer guidelines to multinational enterprises, among others, in such areas as employment, training, conditions of work and life, and industrial relations. The continued prominent role of multinational enterprises in the process of social and economic globalization renders the application of the principles of the MNE Declaration important and necessary in the context of foreign direct investment and trade, and the use of global supply chains. The principles of the MNE Declaration serve as guidelines for enhancing the positive social and labor effects of the operations and governance of multinational enterprises to achieve decent work for all. These guidelines can also be used in developing partnerships to address many of the challenges which neither governments nor companies can address on their own, including multi-stakeholder partnerships and international cooperation initiatives.

The **UN Global Compact** supports companies to: 1) do business responsibly by aligning their strategies and operations with [Ten Principles](#) on human rights, labor, environment and anti-corruption (see [UN Global Compact Management Model](#), 2010); and 2) since 2017, take strategic actions to advance broader societal goals, such as the UN Sustainable Development Goals, with an emphasis on collaboration and innovation.

G2 Stakeholder engagement and partnerships

5	Has the company publicly adhered to any of the following initiatives launched by institutions (from governmental to international bodies) to prevent FLW? (Tick all that apply)	United States 2030 Food Loss and Waste Reduction Goal
		Malabo Declaration on Accelerated Agricultural Growth and Transformation for shared Prosperity and Improved Livelihoods
		Asia-Pacific Economic Cooperation (APEC) Action Plan for Reducing Food Loss and Waste
		Parliamentary Front against Hunger in Latin America and the Caribbean
		Regional Alliance for Food Loss and Waste Production
		EU Food Losses and Food Waste Platform
		Other (e.g. local/ national /regional initiative)
Additional information: For more information on these initiatives, see: http://www.fao.org/3/ca1397en/CA1397EN.pdf		
6	Stakeholder engagement and / or partnerships to combat obesity, undernutrition, micronutrient deficiencies and related diseases	
6.1	Does the company have partnerships with, or formally support any of the following international initiatives / organizations to address malnutrition in priority populations? (Tick all that apply)	SUN Business Network
		World Food Program
		UNICEF
		Save the Children
		Zero Hunger Challenge
		GAIN
		Amsterdam Initiative against Malnutrition
Other relevant organization		
Additional information: For a partnership to be acknowledged in this indicator, the company is required to provide evidence of a significant in-kind or financial investment and a long-term commitment (a year or more). The list is not exhaustive, therefore the answer option 'Other relevant organization' is in place for other organizations which may include Action Against Hunger, Power of Nutrition, HarvestPlus and many more. For reporting purposes, please provide a complete list of partnerships.		
6.2	Can the company provide evidence of one-to-one discussions with key organizations working on malnutrition to solicit input on its commercial strategy / policy / approach?	Yes
		No
		No information
Additional information: Key organizations could include those listed in indicator 6.1, as well as FAO, Alive and thrive, etc. One-to-one meetings is regular dialogue, and meetings without promotional purpose. Being a member of these organizations is not sufficient.		
Disclosure		
7.1	Does the company publicly disclose: (Indicator 1)	Its commitment to engage with stakeholders in developing nutrition policies / programs
7.2	Does the company publicly disclose: (Indicator 2)	Specific examples of how input has been used to adapt nutrition-related policies / programs, i.e. to change business practices
		Broad statement about the benefits of nutrition-related stakeholder dialog
		No
8	Does the company publicly disclose: (Indicator 3)	Names and affiliations of members of its formal panel of experts / names of advisors with expertise on obesity and diet-related chronic diseases (indicator 3.1)
		Names and affiliations of members of its formal panel of experts / names of advisors with expertise on undernutrition and micronutrient deficiencies (indicator 3.2)
		Not applicable (indicator 3.2)
9	Does the company publicly disclose:	A narrative about its stakeholder engagement activities related to malnutrition and priority populations (indicator 6.2)

Appendix II: ATNI Expert Group members

The mandate of the Expert Group is to provide input into the development of the company assessment methodology and to review the analysis and Index report. This group consists of members with expertise in various aspects of nutrition (including both undernutrition and obesity and diet-related chronic diseases) and the role of the food and beverage industry in improving diets and nutrition.

The members of the Expert Group serve in their personal capacities and in an advisory role. They are voluntarily advising ATNI and not paid for their services. 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 Emerita of Epidemiology, Department of Biostatistics and Epidemiology, Perelman School of Medicine, University of Pennsylvania;
Research Professor in Community Health & Prevention, Drexel University Dornsife School of Public Health

Boyd Swinburn

Professor, Population Nutrition and Global Health at the University of Auckland and Alfred Deakin;
Professor and Director, WHO Collaborating Centre for Obesity Prevention at Deakin University in Melbourne

Linda Meyers

Senior Director (retired), Food and Nutrition Board, National Academies of Sciences, Engineering, and Medicine, Washington, DC

Mike Rayner

Professor, Population Health at the Nuffield Department of Population Health, University of Oxford; *Director*, the Centre on Population Approaches for Non-Communicable Disease Prevention, University of Oxford

Terry T-K Huang

Professor, Health Policy and Management, City University of New York;
Director, the Center for Systems and Community Design, Graduate School of Public Health and Health Policy, City University of New York



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Access to Nutrition Initiative

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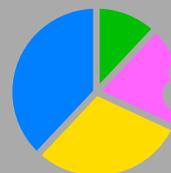
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