

INDIA SPOTLIGHT ACCESS TO NUTRITION INDEX 2020

METHODOLOGY

DEVELOPMENT, STRUCTURE, SCOPE, CONTENTS,
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ACCESS TO
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INITIATIVE

INDIA SPOTLIGHT
ACCESS TO NUTRITION INDEX 2020
METHODOLOGY

Table of contents

Table of contents.....	3
Abbreviations	5
Introduction	6
1. Conceptual framework: Corporate benchmarking	8
2. ATNI's Index methodology design process & background	10
2.1 Purpose and Theory of Change behind ATNI's Indexes	10
2.2 Stakeholder consultation and expert input	12
2.3 Original Global Index Corporate Profile methodology development.....	13
2.4 Spotlight Index development	16
2.5 Product Profile methodology development	17
2.6 BMS marketing methodology development	17
3. Key Index elements and scope.....	18
3.1 Key Index elements	18
a) The Corporate Profile	18
b) The Product Profile.....	18
c) The breast-milk substitutes (BMS) marketing assessment	19
3.2 Topics beyond the scope of all Indexes	19
4. Structure of the methodologies and approach to scoring and ranking	20
4.1 Corporate Profile methodology.....	20
4.2 Product Profile methodology	24
5. The India Spotlight Index 2020	27
5.1 Specific aim of the India Spotlight Index.....	27
5.2 Basis of, and approach to developing, the India Spotlight Index methodology	27
5.3 Company selection	29
6. Key India Spotlight Index 2020 elements.....	31
6.1 Corporate Profile methodology: adaptation and changes since 2016	31
6.2 India Spotlight Index Methodology structure.....	35
Approach to India Spotlight Index 2020 scoring and weighting.....	37
Limitations to the Corporate Profile methodology	37
Product Profile Methodology.....	38
Limitations to the Product Profile methodology	39
Other research limitations and considerations	40
7. India Spotlight Index 2020 research methods.....	42
7.1 Corporate Profile assessment.....	42

Product Profile assessment: Criterion B1	43
7.2 Quality assurance processes	43
8. Follow-up	45
Appendices	46
Appendix I: India Spotlight Index Corporate Profile Methodology 2020	46
Section 1 – Nutrition governance and management.....	46
Section 2 – Formulating and delivering appropriate, affordable, accessible products.....	53
Section 3 – Influencing consumer choice and behavior	65
Appendix II: Organizations consulted.....	81
Appendix III: ATNI India Review Panel and global Expert Group members.....	82
Disclaimer	84

Abbreviations

ASCI	Advertising Standards Council of India
ATNF	Access to Nutrition Foundation
ATNI	Access to Nutrition Initiative
BMS	breast-milk substitute
CSO	civil society organization
CSR	corporate social responsibility
DOB	date of birth
ESG	environmental, social and governance
F&B	food and beverage
FAO	Food and Agriculture Organization of the United Nations
FBAI CNC	Food & Beverage Alliance of India, Common Nutrition Criteria
FLW	food loss and waste
FFRC	Food Fortification Resource Centre
FSMS	food safety management system
FSSAI	Food Safety and Standards Authority of India
GAIN	Global Alliance for Improved Nutrition
HFSS	high in fat, salt and/or sugar
HSR	Health Star rating
ICC	International Chamber of Commerce
ICDS	Integrated Child Development Services
IFBA	International Food and Beverage Alliance
IMS Act	Infant Milk Substitutes Act
INR	Indian National Rupee
KPI	key performance indicator
NDA	non-disclosure agreement
NGO	non-governmental organization
NITI Aayog	National Institution for Transforming India
NNS	National Nutrition Strategy
NPS	nutrient profiling system
POSHAN	Prime Minister's Overarching Scheme for Holistic Nourishment
R&D	research and development
SDGs	Sustainable Development Goals
SEARO	South-East Asia Regional Office (of WHO)
TGI	The George Institute for Global Health
UN	United Nations
WHO	World Health Organization

Introduction

This document sets out the methodology and design of the second Access to Nutrition India Spotlight Index 2020, published by the Access to Nutrition Initiative (ATNI).

In 2016, this Index was the first independent national assessment to measure the contribution of India's largest food and non-alcoholic beverage (F&B) manufacturers towards Indian consumers' nutrition and health needs. It showed that the largest F&B manufacturers in India are making progress but falling short of what they can and must do to fight the double burden of malnutrition (undernutrition and overweight/obesity challenges) in India. The 2016 Index scored companies on their Corporate Profile and Product Profile with two separate rankings.¹

To monitor and measure Indian companies' impact further, the 2020 edition has been developed and adapted to the present Indian context. The 2020 Index has increased the number of companies assessed and presents one integrated ranking, with elements from the Product Profile now incorporated into the Corporate Profile. As the underlying conceptual framework and methodology of these two Profiles are distinct, they have been described as separate elements of the India Spotlight Index 2020.

The purpose of the India Spotlight Index 2020 is to encourage companies to increase Indian consumers' access to healthy and affordable nutritious products and responsibly exercise their influence on consumers' choice and behavior. The Index is a relative ranking, allowing stakeholders to compare performance between different companies and the development of individual corporate performance over time. It is a tool that can be used by major food and non-alcoholic beverage manufacturers to benchmark their nutrition practices and serves as an impartial source of information for a wide range of stakeholders (investors, academics, government and civil society organizations).

The Access to Nutrition Initiative (ATNI) is hosted by the Access to Nutrition Foundation (ATNF), an independent, not-for-profit, international organization based in Utrecht, the Netherlands. It receives core funding from the Dutch Ministry of Foreign Affairs, the UK Department for International Development and the Bill & Melinda Gates Foundation. ATNI is independent from, and does not accept funding from, companies it rates nor the wider F&B industry. It is overseen by a Board of Directors. Further information about ATNI's governance and operating policies is available [here](#). ATNI is also supported by more than 60 institutional investment organizations with \$7 trillion in assets under management, all of whom have signed the [Access to Nutrition Index Investor Statement](#). ATNI has worked extensively with the investment community to ensure that the Index is a useful tool for investors as they engage with and invest in F&B companies.

¹ The Corporate Profile measures companies' policies, practices and disclosure related to promoting good nutrition for all and the Product Profile assesses the nutritional quality of companies' product portfolios. Details of these are described in chapters 3 and 4.

The India Spotlight Index follows the model of the Global Access to Nutrition Index, the concept and methodology for which were initially developed by the Global Alliance for Improved Nutrition (GAIN) over a four-year period from 2009 to 2012. The Index concept was developed through extensive consultation with stakeholders including companies, governments, international organizations, civil society organizations, academia and investors. Three Global Indexes have been published to date: the first in March 2013, the second in January 2016 and the third Index in March 2018. These Indexes score and rank the performance of the world's largest global F&B manufacturers' nutrition policies, practices and disclosure. The Indexes also include an assessment of the world's six largest baby-food manufacturers' marketing policies and practices. The third Global Index also introduced a new element – the Product Profile – which assesses the nutritional quality of the companies' product portfolios.

Chapters 1 to 4 of this document describe the general approach ATNI uses to develop its Indexes, including the Theory of Change, which guides the Initiative's work. It outlines the main topics addressed by ATNI Indexes and provides an explanation of the different elements:

- the Corporate Profile,
- the Product Profile and
- the breast-milk substitutes (BMS) marketing assessment,

although a BMS marketing assessment is not included in the India Spotlight Index 2020. The India Spotlight Index 2020 methodology is described in chapters 5, 6 and 7 with details about company selection, differences from the Global Index 2018 and the approach used for data collection and the principles for scoring and ranking that are applied in the 2020 India Spotlight Index. Chapter 8 concludes with ATNI's intentions in terms of publishing future India Spotlight Indexes. A full description of the indicators used in the India Spotlight Index 2020 is included in Appendix I.

1. Conceptual framework: Corporate benchmarking

Over the last two decades, there has been a proliferation of independent benchmarks, ranking initiatives and financial indexes that measure corporate performance on a range of environmental, social, governance (ESG) and ethical issues. Research conducted several years ago identified more than one hundred at that time, and today there are even more.²

ATNI's Indexes are modelled on the types of ESG benchmarks developed primarily for or by the investment and finance community. These benchmarks are broadly similar: they typically assess one or more of the following:

- i) corporate policies or commitments on the selected issue or issues;
- ii) their approach to, and progress in, managing the selected issues; and
- iii) the extent of disclosure of their policies and practices.

They can be used in various ways:

- i) by investors in their investment research and decision-making, or in their engagement with companies in which they invest;
- ii) by companies to compare their performance to their competitors, and develop better strategies and plans; and
- iii) by organizations or individuals (e.g. in academia, the media, policymakers, certification agencies and auditors or corporate advisors) interested in companies' contribution to addressing malnutrition challenges.

One of the first steps taken by GAIN, the organization that incubated the Indexes, was to undertake an in-depth analysis of 32 such benchmarks and indexes to learn from them and incorporate their best features. Several of those assessed, including the Access to Medicine Index, the Carbon Disclosure Project and the Forest Footprint Disclosure Project, continue to be published today.³

² For more information, see: SustainAbility (2011), *Rate the Raters Phase Four: The Necessary Future of Ratings*, available at: http://sustainability.com/wp-content/uploads/2016/07/rtr_phase_4_report.pdf; and SustainAbility (2018), *Rate the Raters 2018: Ratings Revisited*, available at: http://s10458.pcdn.co/wp-content/uploads/2017/12/SA-RateTheRaters_Ratings-Revisited_March18.pdf.

³ More information on these can be found in:

- Access to Medicine Index [online], available at: <https://accesstomedicineindex.org/>
- Carbon Disclosure Project [online], available at: <https://www.cdp.net/en>
- Forest Footprint Disclosure Project [online], available at: <https://www.nepcon.org/newsroom/forest-footprint-disclosure-project>

The Access to Nutrition Indexes aim to embrace the key principles that emerged from that analysis outlined in Box 1 in order to provide robust, comprehensive, independent analysis of the world's largest F&B manufacturers' contribution to addressing the world's nutrition challenges.

Box 1: Key design principles that guide the Access to Nutrition Indexes

Base the assessment methodologies on prevailing international 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 standards, norms and established best practices form the starting point of the methodology. The Indexes do not assess compliance with regulations or law but the degree to which companies voluntarily take responsibility to improve their policies, practices and products.

Recognize current state of knowledge and continually evolve

As knowledge and practices about diets, nutrition and health continually evolve, the methodology should be revised at regular intervals, while striving to retain comparability over time.

Ensure relevance and applicability to a range of company types

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).

Identify, reward and spread good practice

ATNI 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 critical nutrition challenges. They are not intended to be 'name and shame' exercises. The ATNI Indexes therefore award credit for good practice beyond minimum standards, rather than penalizing companies for poor practice. The Indexes aim 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.

Encourage transparency and 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 matters, and to engage with them about their approach and effectiveness.

Utilize an inclusive approach, incorporating multi-stakeholder input

Input from relevant stakeholder groups – including policymakers, experts, civil society organizations and industry – was sought throughout the original methodology development process and subsequent revisions. This applies to the Global Index methodology, which served as the basis for the Spotlight Index methodology, and the same approach was applied in the development of the latter's methodology.

2. ATNI's Index methodology design process & background

This chapter describes how the Index methodology was developed, to provide an understanding of its scope and unique attributes. This is important background because the methodologies for all Spotlight Indexes are derived from the Global Index methodology.

The first section outlines the purpose of the Indexes and the underlying Theory of Change before outlining the critical role stakeholder consultation and expert input plays in all methodology design and development. The following section explains the steps taken to design the initial Global Index methodology and the three elements that make up the Indexes at present without referring to the specific details of the India Spotlight Index 2020.

2.1 Purpose and Theory of Change behind ATNI's Indexes

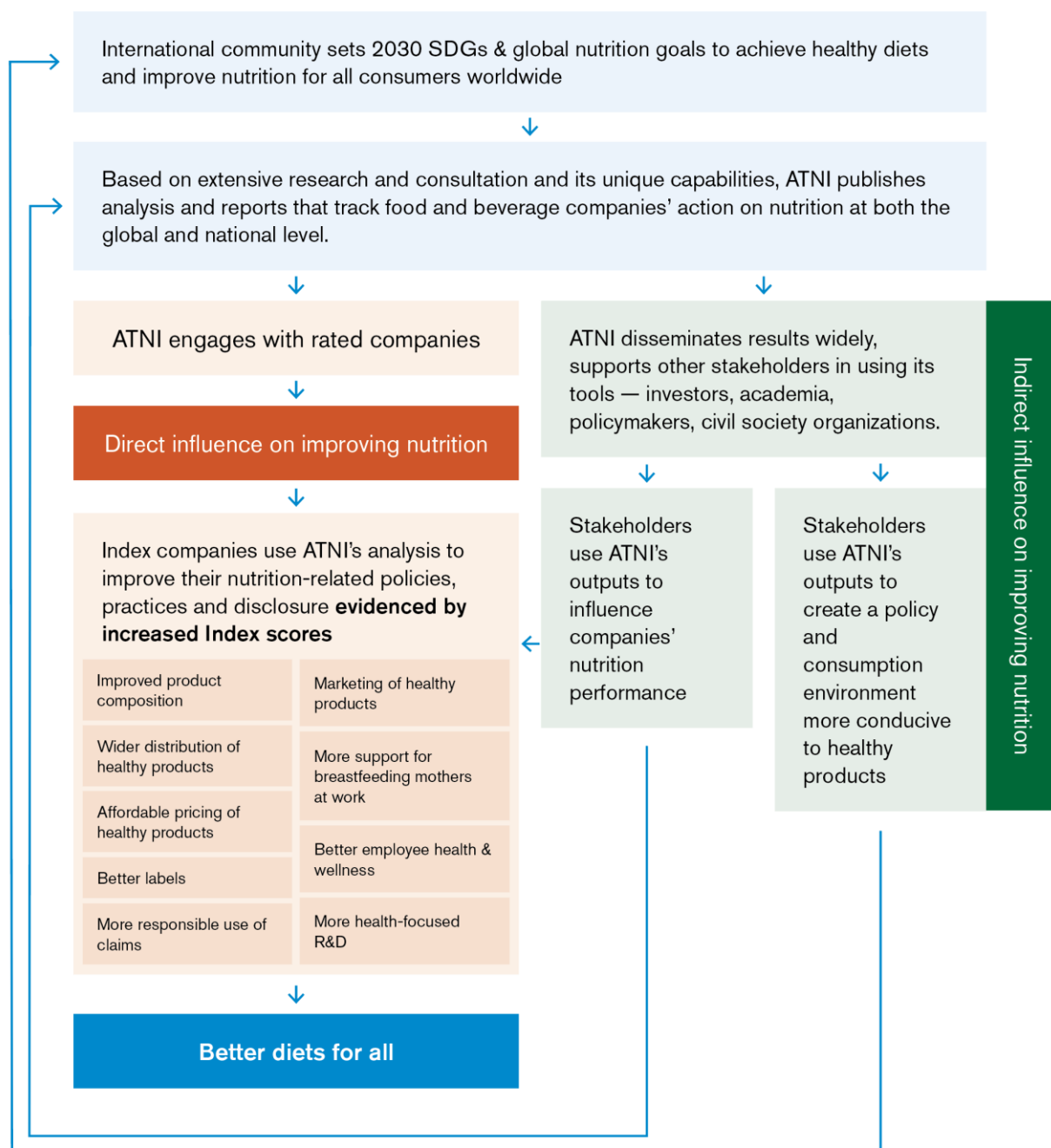
The purpose of ATNI is to develop and deliver tools that:

- track the contribution of the F&B industry to addressing the global nutrition challenges of overweight and obesity, diet-related diseases, as well as undernutrition and
- can be used by stakeholders to hold companies to account for delivering their commitments to these challenges.

ATNI uses the Global Indexes – its flagship tools – to encourage F&B companies to do as much as they can to improve the diets of adults and children around the world, as depicted in ATNI's Theory of Change below (Figure 1).

The point of departure for ATNI's Theory of Change is contributing to the global effort to reach the Sustainable Development Goals (SDGs): while improving nutrition and achieving sustainable diets healthy for people and the planet is an important element for the achievement of at least 12 of the 17 SDG's, ATNI prioritizes Goal 2: 'End hunger, achieve food security and improved nutrition and promote sustainable agriculture.' This objective is responsible for the tools that ATNI develops and employs to help F&B manufacturers become further involved in the process of ending hunger and ensuring access for all to safe, nutritious and sufficient food (Target 2.1) and ending all forms of malnutrition (Target 2.2) by 2030. Likewise, 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 mothers, newborns and children, as well as underserved populations.

Figure 1: ATNI's Theory of Change



Given their scale and reach, globally as well as in India, large F&B manufacturers have a substantial influence on the lives of consumers and employees, and as a result can play a meaningful part in improving their diets and health.

2.2 Stakeholder consultation and expert input

As noted in the introduction, the Indexes were conceived by GAIN in 2009. In the three years leading up to the launch of the first Global Access to Nutrition Index in 2013, stakeholder consultations were held and extensive research was conducted. This was with the aim of building a 'best in class' Index that would be used by different stakeholders, and one that reflected the latest thinking on the private sector's role in tackling nutrition challenges.

Input from a wide range of stakeholders has informed every step of the Indexes' design, beginning with an early feasibility assessment undertaken by McKinsey & Co., and including development of the methodology used for the first Index and the creation of a multi-year strategic plan for the organization. ATNI has a wide range of stakeholders. These include:

- the F&B manufacturers included in the Indexes and their advisors;
- other F&B companies, including other manufacturers as well as food retailers and others in the food processing value chain;
- F&B industry associations or groupings;
- investment banks, investment managers and investment-sector associations;
- non-governmental organizations (NGOs);
- United Nations (UN) agencies;
- academia;
- governments and policymakers;
- media;
- consultants and experts; and
- other commentators or opinion formers relating to the F&B sector, health and nutrition.

Index development began mid-2009 with a first phase of work to assess whether such a tool would be useful to encourage companies to increase consumers' access to more nutritious foods and beverages. In this phase, a variety of stakeholders in high- and low-income countries were consulted. A total of six group consultations were held from September to November 2009 in North America, Europe, Asia and Africa to ensure diverse input. These were supplemented by a series of individual conversations with representatives of key stakeholder groups. Overall, the stakeholders consulted were receptive to the idea of an Index and provided essential insight into challenges and opportunities in rating companies on their nutrition practices. The consultations also provided early indications of how different stakeholders might use an Index.

Two multi-stakeholder groups were established in 2011 to provide advice on various aspects of Index development: an Expert Group and an Independent Advisory Panel. In order to protect the independence of the Index, no executives currently employed by F&B companies are eligible to serve on either group. All members serve in their personal capacities and solely in an advisory role.

Expert Group

The mandate of the ATNI Expert Group is to advise on methodology development and to review Index reports, i.e. it is a technical advisory group. Expert Groups are comprised of specialists in

nutrition (including both undernutrition and obesity/diet-related chronic diseases) and in the role that the F&B industry plays in the nutrition sector. A specific BMS Marketing sub-group also advises on the approach to assessing BMS marketing, and on methodology development.

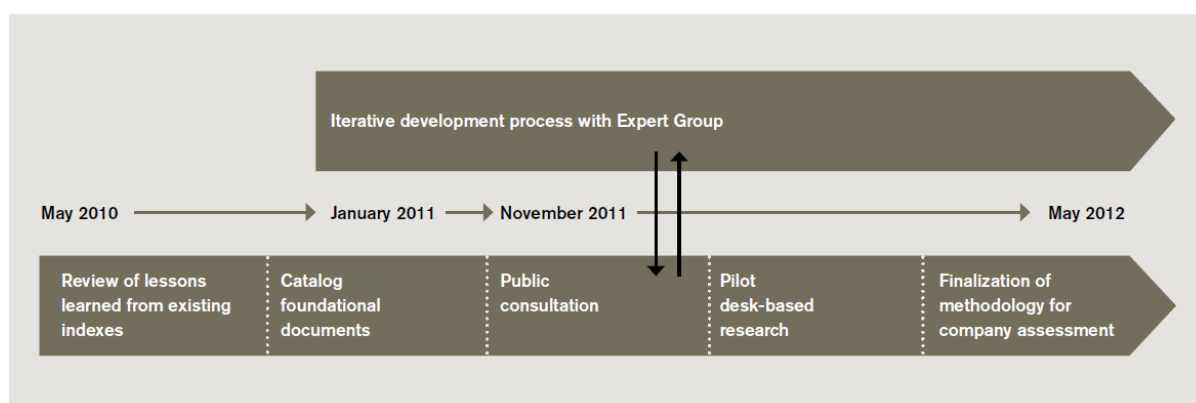
For each Spotlight Index, separate Expert Groups or Review Panels are set up, comprised of members with specific insight and expertise with respect to that specific market. The members of the India Spotlight Index Review Panel are listed in Appendix III, and a list of those who advise on the Global Index is available [here](#).

After the publication of each Index, ATNI consults stakeholders to solicit their views on the results and recommendations, the methodology and how the Index should evolve. This is important to ensure that the Indexes reflect current stakeholders' knowledge and expectations, and because ATNI relies on the active use by stakeholders of the results of the Index to amplify their impact. The input received from these consultations is collated and shared with the Expert Group, along with ATNI's analysis of any changes to relevant standards, guidelines and international or national strategies or frameworks, and informs changes that ATNI makes to each iteration of the Index methodologies.

2.3 Original Global Index Corporate Profile methodology development

A thorough consultative process was used to develop the ATNI company assessment methodology, called the Corporate Profile.

Figure 2: Overview of the original Global Index Corporate Profile methodology development process



1. Review of lessons learned from existing indexes and benchmarks

Before beginning the development of the ATNI methodology, an in-depth review of 32 existing peer indexes, ratings and ranking systems was conducted to assess best practice and identify their best elements. Among the elements reviewed were these initiatives' origins, rationale, structure, governance, communications strategies, approach to stakeholder engagement and consultation,

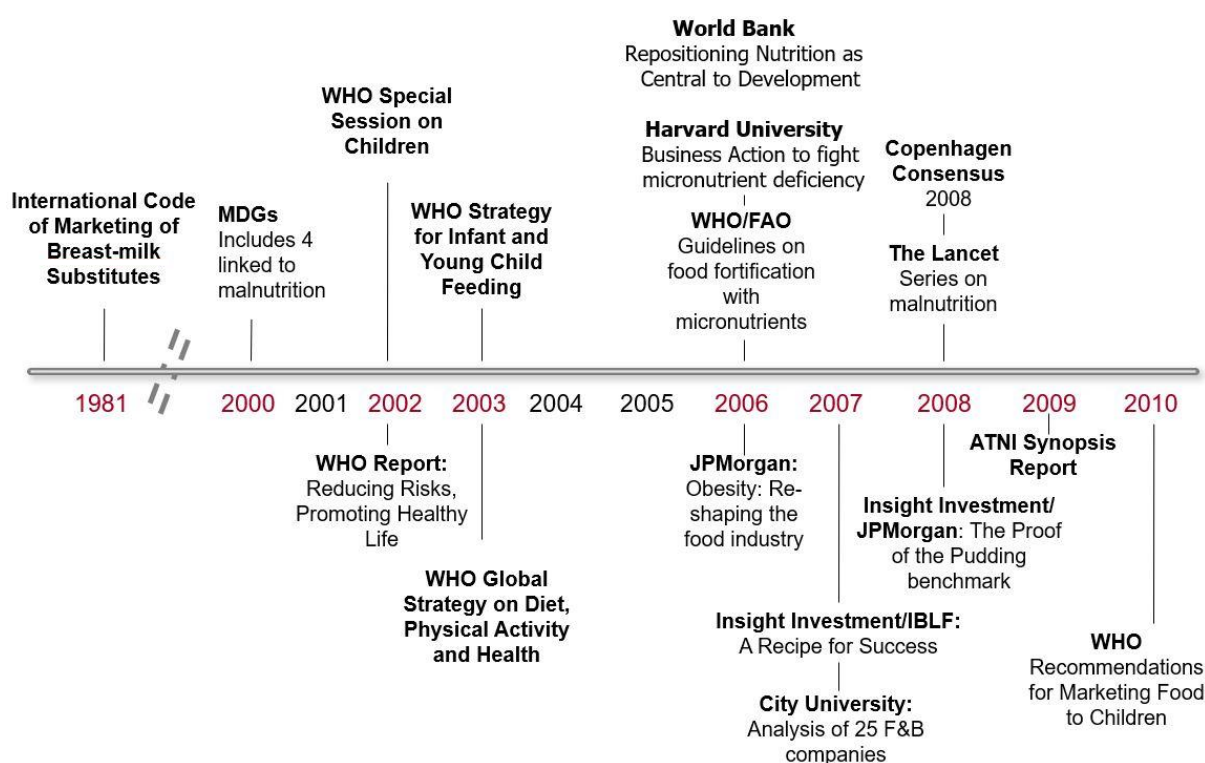
and the structure and content of their methodologies. Key lessons learned were identified about how to design an effective Index and Index organization – not only on how to design the methodology.

2. Catalog foundational documents

Extensive research was undertaken to identify all relevant international policies, norms and guidelines relating to diets and nutrition, developed by, for example, the World Health Organization (WHO), the Food and Agriculture Organization (FAO), and other pre-eminent international organizations that provide guidance or recommendations on nutrition-related practices relevant to the F&B industry. These were identified to provide the basis for the specification of indicators.⁴ Selected key documents available at the time are shown in Figure 3. This catalog is updated regularly to reflect any new guidance or standards developed internationally by relevant UN bodies and international organizations. ATNI's methodologies are updated for each Index based on these new developments.

In areas where no such international guidance existed, indicator specification was based on: reports published by governments, NGOs, investors and industry associations; academic studies; recommendations drawn from stakeholder consultations; examples of strong corporate practices, and; advice from the ATNI Expert Group.

Figure 3: Foundations of the original Corporate Profile methodology



⁴ Indicators are the first-stage 'unit' of information that ATNI uses to measure companies' performance in its Indexes. These are defined as questions with pre-defined answer options, and organized in criteria and categories, as described below. For more information on the process of weighting and scoring, please see the section entitled 'Structure of the methodologies and approach to scoring and ranking', on page 20.

3. Iterative Corporate Profile methodology development process with the Expert Group

Extensive discussion with the ATNI Expert Group began in January 2011. This international group of experts on diet, health and nutrition, and the F&B industry, met in full or as sub-groups over 20 times during a two-year period. The group provided advice on the scope and content of the Corporate Profile methodology and shared its expertise on a range of topics, including international policies and guidance on nutrition and their relevance to the various business functions of F&B companies. This thorough development process yielded a draft methodology that was put to stakeholder consultation in November 2011.

4. Stakeholder consultation

During November 2011 an extensive survey was posted on the ATNI website to solicit stakeholder views on the proposed structure and content of the Corporate Profile methodology, with the goal of strengthening the final methodology. While open for comment from any interested individual, the project team reached out to a wide range of stakeholder groups, as outlined above. Experts from both high- and low-income countries participated. Responses were analyzed to identify areas of consensus and elements that raised concern. The ATNI Expert Group then convened to discuss the feedback received and to help guide the ensuing revision process, which took place from December 2011 to February 2012.

5. Corporate Profile pilot using desk-based research

Using this revised Corporate Profile methodology, pilot research was conducted using publicly available materials from a sample of companies to test the feasibility and relevance of the Corporate Profile methodology. The sample of companies was selected to test the methodology against variations in:

- type of company (multinational, local subsidiary of multinational, regional);
- form of company ownership (publicly listed, privately owned);
- company product lines (food and/or beverage); and
- Index (Global versus Spotlight).

This pilot research process led to additional revisions to the methodology. The final version of the Corporate Profile was first used for the ATNI Global Index published in 2013.

All subsequent Global and Country Spotlight Index Corporate Profile methodologies were developed similarly, following these steps:

- review of lessons learned (from previous iteration of the Index or from related Indexes);
- multi-stakeholder consultations (including companies);
- adaptation of the methodology with input from the Expert Group; and
- finalization of the methodology, publication and dissemination to companies selected for inclusion in the Index.

2.4 Spotlight Index development

In 2012, the Index development team at GAIN conducted research in South Africa, Mexico and India to determine whether Indexes modeled on the Global Indexes could be published for individual countries, if adjustments were made to the Global Index methodology to reflect the local legal, business and nutrition context.

Multi-stakeholder consultations were held in each of these three countries early in the development process so that country-specific perspectives could be incorporated into the design of each Spotlight Index and into the overall approach of ATNI. These consultations were particularly helpful in understanding the local nutrition issues faced by the F&B industry and how companies interact with various stakeholders in those countries.

South Africa: In May 2011, the Index development team held two roundtable discussions with multi-stakeholder groups and one session with investment-community representatives in Cape Town. It also held a roundtable discussion with investment-community representatives in Johannesburg, as well as a series of individual conversations with various stakeholders.

India: In June 2011, the Index development team held two roundtable discussions in New Delhi. One of these sessions was attended largely by representatives from NGOs, international organizations, civil society groups and bilateral donors, while the second session consisted primarily of F&B industry representatives, investors and industry consultants. One roundtable discussion was also held in Mumbai with Indian stakeholders primarily from F&B companies.

Mexico: In July 2011, the Index development team held three multi-stakeholder meetings in Mexico City. Two of these sessions were attended by F&B companies, civil society representatives and academia, while the third session involved investors.

ATNI concluded that Spotlight Indexes could be a valid and valuable tool to help those countries to address specific nutrition challenges. Having adjusted the methodology for each of the countries, research was undertaken on the ten largest F&B manufacturers in each one, including a mix of multinational and local companies. The results were not published, as they were intended only to be preparatory research exercises for later Spotlight Indexes.

The first Spotlight Index for India was published in December 2016, after ATNI secured funding. A second Spotlight Index for the United States was published in November 2018. ATNI aims to publish Spotlight Indexes at regular intervals. Therefore, the India Spotlight Index 2020 will be the second iteration.

2.5 Product Profile methodology development

In the Spotlight countries, in addition to assessing companies' business practices, ATNI worked with a team from the University of Oxford's Nuffield Department of Population Health, led by Professor Mike Rayner, to develop an approach to assessing the nutritional quality of each company's products. The methodology was developed over several months during 2011 with ATNI's Expert Group, of which Professor Rayner is also a member.

The research was undertaken in 2012 in seven stages:

- 1) selecting the nutrient profiling models used to analyze the nutritional quality of products;
- 2) specifying the population of foods and beverages to analyze;
- 3) sampling from this population of foods and beverages;
- 4) obtaining nutritional information for the sampled foods and beverages;
- 5) selecting product categories and sub-categories for analysis;
- 6) applying the nutrient profiling models; and
- 7) selecting the outputs for the analysis.

The teams assessed the nutritional quality of about half the products sold by the ten companies in the Index pilots in each country, using a sampling frame to define a dataset of products representative of the population. Products were assessed using two nutrient profiling models that met the selection criteria agreed by the Expert Group. The full methodology and the results from the Mexico study are available on request.

ATNI concluded that product assessments using an independent nutrient profiling model would be a valuable element to include in each Index and identified several ways the methodology could be improved. These were incorporated into the methodology used for the India Spotlight Index 2016, the final report for which is available [here](#), and the 2018 Global Index Product Profile, described later, which is available [here](#).

2.6 BMS marketing methodology development

A specific element of most Access to Nutrition Indexes is an assessment of major baby-food manufacturers' marketing policies, management systems, disclosure, and of their practices within specific markets, using an additional, comprehensive methodology. ATNI began developing the methodology for this element of the Indexes in 2014, again through extensive consultation with civil society organizations, experts in the field and baby-food companies. The first BMS marketing assessment using this methodology was included in the second Global Index published in 2016 and in the India Spotlight Index published later that year. The third Global Index published in 2018 and U.S. Spotlight Index 2018 also included BMS marketing assessments. The India Spotlight Index 2020 will not include a BMS marketing assessment. The 2016 BMS marketing assessment in India showed the high standards of the Indian Infant Milk Substitutes (IMS) Act and relatively good compliance by companies. ATNI has limited resources for on-the-ground assessment of BMS marketing practices and aims to cover different markets for the next assessments.

3. Key Index elements and scope

This section describes the scope and purpose of the main elements of the Access to Nutrition Indexes, as well as topics that are not included because they are beyond the scope of the Indexes.

3.1 Key Index elements

a) The Corporate Profile

Companies' policies, practices and disclosure related to promoting good nutrition for all – i.e. preventing and tackling obesity and diet-related chronic diseases, and undernutrition and micronutrient deficiencies – are assessed using the Corporate Profile methodology. It reflects the efforts companies have made to: incorporate nutrition into their overall corporate strategy, and their governance and management systems; improve the nutritional quality of product portfolios and develop 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; market their products responsibly; and engage with policymakers and their stakeholders.

The Corporate Profile was the first element of ranking developed by ATNI, to which most of the methodology described in this document refers. Since the 2013 Global Index, several changes have been made to the details of the methodology without altering the basic structure. ATNI consults with stakeholders and the ATNI Expert Group periodically, to receive feedback and make modifications to ATNI Indexes.

b) The Product Profile

An objective assessment of the nutritional quality of companies' product portfolios was previously presented in a separate Product Profile section. As of this assessment it is performed as part of the product category assessment in the Corporate Profile that captures companies' efforts towards formulating and reformulating their products. The scores and ranking of the Product Profile provide one of the independent assessments on the performance of companies in the Indexes and as of this assessment contribute to the overall Corporate Profile scoring and ranking with a relatively high weighting. It principally assesses how healthy companies' products are. In other words, it analyzes the nutritional quality of the products they sell, which is determined by the levels of fat, salt, sugar, fruit, vegetables and other components.

The Product Profile also provides an overview of the 'healthiness' of products within categories and the extent to which companies' products meet nutritional standards so they are permitted to be marketed to children. It provides a baseline to measure the improvements companies make with

the formulation of their products. It also offers insights into the proportion of healthy products in a company's portfolio. A full description of the methodology used for the Product Profile, as applied for the Global Index 2018, is available [here](#).

c) The breast-milk substitutes (BMS) marketing assessment

ATNI Indexes can include an assessment of the marketing practices of major baby-food companies, presented in the BMS marketing sub-ranking. This element is not included in the India Spotlight Index 2020, but further information and the methodology used for such assessments, as applied for the Global Index 2018, is available [here](#).

3.2 Topics beyond the scope of all Indexes

The Access to Nutrition Indexes focus on F&B manufacturers' efforts to improve the diets, and thereby the health, of consumers. Certain topics are beyond the scope of the Indexes:

Products intended to address acute undernutrition or other special nutrition needs

The Indexes are not designed to take account of companies' activities targeting people with special nutritional or dietary needs such as athletes and people whose dietary/ therapeutic feeding requirements are supervised by healthcare professionals.

Products that are a part of a formal weight-management program

If companies rated by the Indexes sell products 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 assessment, as there is currently no international consensus on the appropriate nutritional standards for such products.

Issues not related to nutrition and health

Other issues that are related to the social and environmental impact of F&B companies are largely outside the scope of ATNI Indexes. Some of these issues can be included in country-specific Spotlight Indexes if local stakeholders and reviewers and the ATNI international Expert Group think it is relevant. They include:⁵

- water-management practices;
- environmental sustainability, including sourcing of ingredients;
- impact on climate change;
- fair treatment of workers and communities; and
- crop breeding (e.g. hybridization and genetic modification).

⁵ Food safety is assessed in the India Spotlight Index 2020 as the Index is adapted to the local regulatory, business, nutrition and health context of India. However, this is not assessed in other ATNI Indexes.

4. Structure of the methodologies and approach to scoring and ranking

Each of the main ATNI Index elements has a different structure and methodology, and generates the final score using different scoring and weighting systems. This section explains those aspects of the Corporate Profile and Product Profile, and how they are combined to generate one score and rank as of 2020.

4.1 Corporate Profile methodology

The overarching concept of the Corporate Profile methodology is that it inherently defines what 'ideal performance' is for the companies being assessed, drawn from all the foundational documents and expert knowledge of good practice. In other words, were a company to have the policies, commitment, objectives, targets, management systems, practices and disclosure described by the wording for the top-level performance of each indicator, it would score 10 on each indicator, and therefore would score 100% for each criterion and subsequently on each category, and achieve an Index score of 10 out of 10.

The Corporate Profile methodology is organized into three sections, each reflecting a distinct aspect of corporate activity: 1) Governance; 2) Delivering products; 3) Influencing consumer choice and behavior.

Each of these **sections** is linked to:

- **Categories:** Seven broad topic areas or categories (A–G) relevant to companies' nutrition-related practices. These categories do not change for any Index.
- **Criteria:** More detailed criteria are defined within each of the categories and are adapted for each Index; there is no fixed number of criteria.
- **Indicators:** Indicators are the first-stage 'unit' of information that ATNI uses to measure companies' performance in its Indexes. These are defined as questions with predefined answer options (the full list of indicators is provided in Appendix I). There are three types of indicators: those related to companies' commitments, practices and disclosure.

While the weightings of the three indicator types are the same for all Indexes, and criteria within categories are always equally weighted, the weighting of the categories varies between the Global Indexes and the Spotlight Indexes, based on the local context and advice from different stakeholders and expert reviewers consulted for each Index. As of 2020, all criteria have identical

weight within a category except for Category B, which includes the Product Profile score. The specific methodology of the Product Profile is described in section 4.2 of this chapter.

Figure 4 summarizes the general Corporate Profile methodology structure as of 2020 Indexes, which includes the Product Profile.⁶

Figure 4: Topic areas of the new Corporate Profile

Seven topic areas (categories)							
A. Governance	B. Products	C. Accessibility	D. Marketing	E. Lifestyles	F. Labeling	G. Engagement	
A1. Corporate nutrition strategy A2. Nutrition governance and management systems A3. Quality of reporting	B1. Product Profile results B2. Product formulation B3. Defining healthy and appropriate products	C1. Product pricing C2. Product distribution	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	E1. Supporting employee health and wellness E2. Supporting breastfeeding mothers at work E3. Supporting consumer-oriented healthy eating and active lifestyle programs	F1. Product labeling F2: Nutrition and health claims	G1. Engaging and influencing governments and policymakers G2. Stakeholder engagement and partnerships	
Examples of criteria within categories							Commitment (25%)
							Performance (50%)
							Disclosure (25%)
Governance	Delivering products	Influencing consumer choice and behavior					
Three sections							
Three indicator types							

The Corporate Profile methodology for each Index follows the same approach to scoring and rating, with variations on the number of indicators and the criteria. To generate each company's overall Corporate Profile score and ranking, the following process is used:

- **Indicator level:** Companies are assessed on the indicators within each criterion, using pre-defined answer options. The top performance level on any indicator is a score of 10 points, with lower scores awarded for lower levels of performance. Many indicators allow the selection of one answer option, using a decreasing sliding scoring scale, e.g. if there are three performance levels possible (e.g. the company has a policy in place, the company is currently developing a policy, the company does not have a policy), the score for the top level of performance is 10, the second level is 5, the third level is 2.5, and no information/no activity is 0. These types of indicators may have multiple answer options with the same

⁶ Figure 4 shows the general structure of the Corporate Profile that includes the Product Profile without describing the detailed changes that have been made for the India Spotlight Index 2020. The detailed changes are described in chapters 5, 6 and 7.

number of points for information purposes. Other types of indicators allow the selection of multiple answer options that typically carry an equal number of points that add up to the total maximum score of 10 points per indicator. If certain indicators are not applicable to the company being assessed, it will be removed from the scoring algorithm.

Two types of multipliers are applied to some indicators; for some, both are applied:

Healthy multiplier: Many indicators assess what companies are doing in relation to 'healthy foods.' However, there is no universally recognized definition of 'healthy foods.' Each company uses a different definition. ATNI cannot verify whether products that meet a company's own healthy criteria are truly healthy (in the context of the Corporate Profile – though this is precisely the purpose of the Product Profile, described later). As a proxy, ATNI uses the score from B3, which assesses the rigor of the nutrient profiling system. A healthy multiplier is applied between 0.5 (adjusting the underlying indicator score) and 1 (having no effect on the underlying indicator score), based on the B3 score, thereby giving a higher score to companies with a robust definition of healthy products.⁷

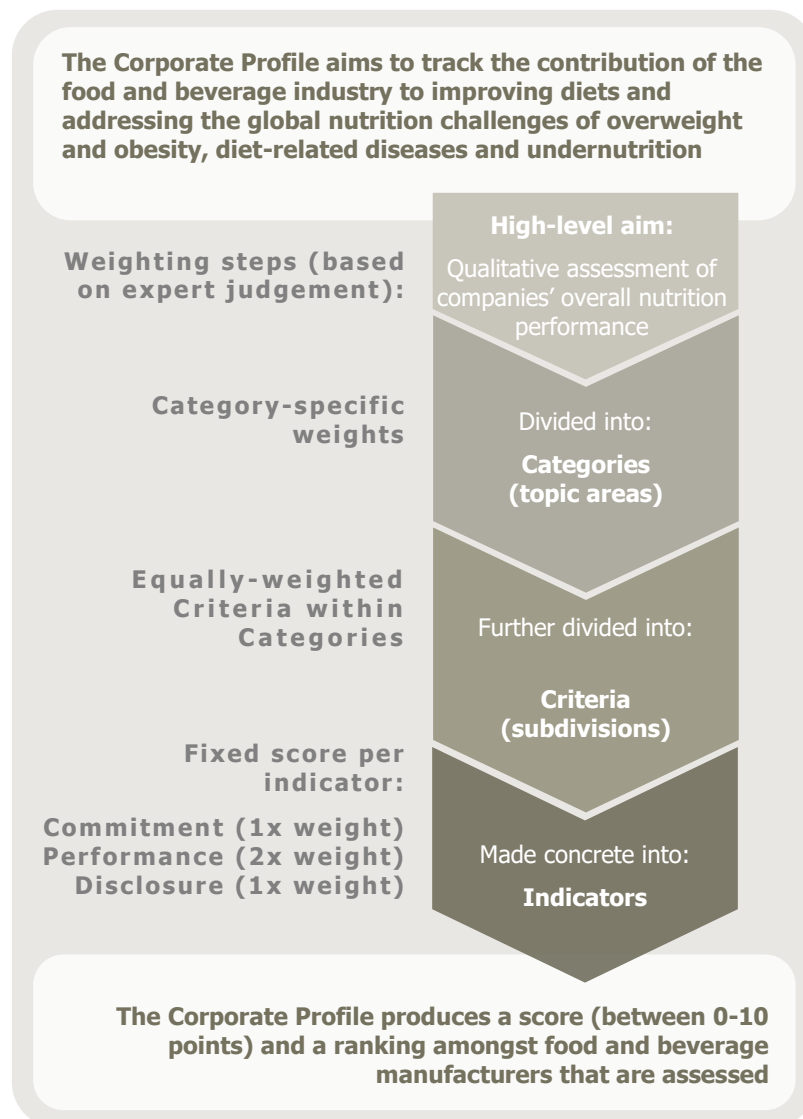
Geographic multiplier: In the Global Indexes this is applied to appropriate indicators to reflect whether companies apply the same policies and practices across all markets of operation, only in selected regions or only in their home markets. Similar to the healthy multiplier, it results in higher scores (by a factor of two) if the activities being measured are applied globally than if the activities are applied only in the company's home market. Geographic multipliers are not applied in the India or other Spotlight Indexes.

- **Criterion level:** Within each criterion, the score is calculated by totaling the 'raw' score for commitments, and multiplying those with a weight of 25%, doing the same for the performance indicators, though they are weighted 50%, and the same for the disclosure indicators, also weighted at 25%. Performance is given twice the weight of Commitment and Disclosure to reinforce the importance of turning commitments into practice. Adding up the weighted scores for each of these three indicator types generates each company's score for each criterion.
- **Category level:** Each criterion is weighted equally within each category; therefore, a company's score for a category is the average score of the criteria within that category. Category B is an exception in this regard. By integrating the Product Profile score into Category B in the India Spotlight Index 2020 (and future Indexes), Criterion B1 has a higher weight (20%) than Criteria B2 (7.5%) and B3 (7.5%), adding up to the total weight of 35% for Category B.
- **Final score:** The final category weightings are then applied. The **result is the company's Corporate Profile score**, out of a maximum of 10.

⁷ A new technical implementation of the healthy multiplier has been implemented in the India Spotlight Index 2020, ranging in value between 0.5 and 1, to improve the approach to scoring and weighting individual indicators. In previous Indexes the value ranged between 1 and 2.

The results will be presented as a ranking in the main report, showing companies' overall Corporate Profile score and their score for each category. More detailed results for each category will be published separately after the main report.

Figure 5: Corporate Profile theoretical framework



It is important to note that Criterion B2 (Product formulation), within Category B Products of the Section 'Delivering products', assesses companies' own commitments and targets to improve the nutritional quality of their products and invest in improving the healthiness of their portfolios. This is not the same as the Product Profile, which is an objective assessment of nutritional quality based on the Health Star Rating (HSR) system and is explained below. For the first time in an Index, in the India Spotlight Index 2020, the results of the Product Profile are integrated as Criterion B1 into Category B.

4.2 Product Profile methodology

The Product Profile assessment adds an objective assessment of the nutritional quality of companies' product portfolios, for each company's best-selling categories in the geographic area covered by the Index. It therefore complements the qualitative product-related criteria in the Corporate Profile, i.e. nutrition formulation and nutrition profiling. Prior to the India Spotlight Index 2020, the Product Profile had been presented as a separate ranking and score. In the India Spotlight Index 2020, the results of the Product Profile are presented as a sub-analysis with the scores integrated into Category B, resulting in one overall Corporate Profile score and ranking.

To determine the nutritional quality of products, ATNI uses two nutrient profiling systems (NPSs)⁸ that meet the qualitative criteria developed by ATNI 's Expert Group,⁹ from research of many such systems collated for WHO:

- The Health Star Rating (HSR) nutrient profiling system, which is used in Australia, but applicable in any market, to determine how healthy each product is. Products are rated between 0.5 stars (least healthy) to 5 stars (most healthy). Any product that scores 3.5 or above is considered healthy.
- A WHO Regional Office Nutrient Profile Model to identify which products are suitable to be marketed to children.

The methodology used for the Product Profile assessment was developed in partnership with the Food Policy Division of The George Institute for Global Health (TGI), based at the University of Sydney, the organization that ATNI commissions to undertake these studies. It draws on the experience of the pilot studies outlined earlier, undertaken by Professor Mike Rayner of the University of Oxford. Professor Rayner is a member of the ATNI Expert Group and advises the TGI research team on their Product Profile methodology.

A full description of the methodology used to assess nine markets for the 2018 Global Access to Nutrition Index, is available in TGI's report of that study. The same two NPSs were used for all

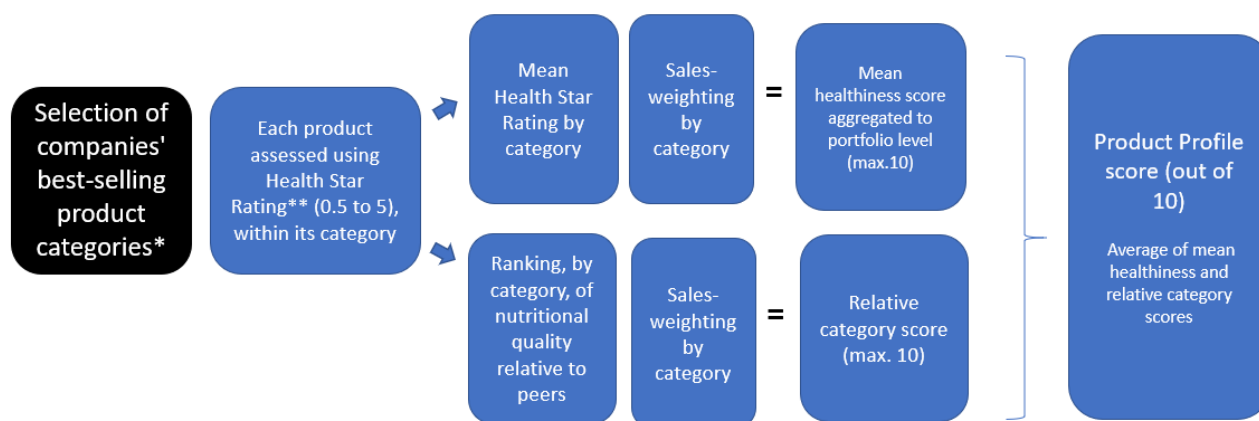
⁸ Nutrient profiling is 'The science of classifying or ranking foods according to their nutritional composition for reasons related to preventing disease and promoting health.' The first systems were developed over 20 years ago for voluntary food labeling schemes. At around the same time, governments and regulatory agencies began to use them to set standards for the use of nutrition and health claims, and they have been used – or proposed for use – by governments to regulate the advertising of foods to children. Retailers, media outlets and others have also developed proprietary systems to help guide decision-making on product formulation, labeling, use of 'healthy' logos and marketing to children. More than 100 NPSs are known to be in use around the world today: World Health Organization (2010). Nutrient Profiling (available at: <http://www.who.int/nutrition/topics/profiling/en/>).

⁹ The criteria used to select these two systems are:

- developed with appropriate stakeholder consultation;
- covered the majority of categories of processed food and beverage products;
- took into account both positive and negative nutrients;
- was not designed solely to address school foods, given the requirement to assess foods in the general market;
- 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;
- enabled differentiation of nutritional quality within and between categories;
- algorithm in the public domain so as to be able to access and apply it; and
- able to generate meaningful results across all countries.

countries for consistency, i.e. to be able to compare results across countries. A summary of the approach is outlined in Figure 6, and the description below.

Figure 6: Product Profile theoretical framework



- **Food category selection:** For each of the companies assessed, ATNI identifies a maximum of five of the companies' best-selling categories in which the companies sell products (data extracted from Euromonitor International's 2018 industry publications of: Packaged Food, Hot Drinks and Soft Drinks). Products eligible for inclusion are all packaged foods and non-alcoholic beverages manufactured by the included companies available for purchase. A food or beverage is considered as a unique item, used in Product Profile calculations, based upon the brand name and description irrespective of serving size and packaging (i.e. a specific brand of cola sold in 330ml cans is considered to be the same food item as the same specific brand of cola sold in 600ml bottles).
- **Nutrient content data:** TGI's FoodSwitch database has been the main source of product and nutrient content data in ATNI's previous Product Profile assessments. Nutrient content information was extracted from photographs of product packaging and entered into TGI's FoodSwitch databases or similar databases to which TGI had access via agreement with their developers. New for the India Spotlight Index 2020, product and nutrient content data from Innova Market Insights (based in Arnhem, the Netherlands) will be combined with TGI's FoodSwitch database to use the most comprehensive, up-to-date information.
- **Research process:** The companies will be provided with their product lists and nutrient content, from the database, and offered an opportunity to make corrections or additions.
- **Calculation of HSR:** The HSR is first calculated for each product. These scores are then aggregated by category, adding up the HSRs for each product in the category and dividing the result by the number of products in the category to generate a mean HSR for that category. The company's non-sales-weighted average HSR for the portfolio is calculated by adding up the HSRs of all its products and dividing that figure by the total number of

products. To generate each company's initial sales-weighted Product Profile score, the mean HSR for each of its categories is weighted by the corresponding sales figure (data extracted from Euromonitor International's 2018 industry publications of: Packaged Food, Hot Drinks and Soft Drinks). The maximum initial score is five (because this is the maximum possible rating on the HSR for any individual product). A similar process is followed applying the WHO regional model (for the India Spotlight Index 2020 that is the WHO South East Asia Region model) to determine the number and percentage of products in the portfolio and by category that are suitable to be marketed to children.

- **The Product Profile score** is this figure doubled, to arrive at the final score. It is doubled so it is scored out of ten to provide comparability with the Corporate Profile.

The results will be presented as a ranking in the report, highlighting best performance among the assessed manufacturers. For the India Spotlight Index 2020, the relative performance of companies within a product category will be scored as well. This is accompanied, inter alia, by information on the extent to which companies' products are suitable to be marketed to children.

5. The India Spotlight Index 2020

The India Spotlight Index 2020 is the second iteration of the India Spotlight Index planned for publication in February 2020.

After exploring the idea of having an Indian Spotlight Index between 2012 and 2013, and having secured the funding to develop further, ATNI consulted extensively with stakeholders on how a Spotlight Index could be applied to the Indian context.

Various companies, industry associations (CII and FICCI), civil society organizations, academia and policymakers were involved through roundtables, meetings and one-on-one consultations to launch the first India Spotlight Index in December 2016. After the launch and success of the 2016 Index, ATNI followed up with stakeholders and companies in India to receive feedback on the outcomes of the first Index. Based on the feedback received and continued relevant impact of the food and non-alcoholic beverage companies on nutrition and health of Indian consumers, the India Spotlight Index 2020 process was initiated.

This chapter first outlines the specific aim of the India Spotlight Index and summarizes how ATNI engaged with stakeholders on its development. Subsequently, it explains the company selection process for the 2020 Index.

5.1 Specific aim of the India Spotlight Index

The aim of the India Spotlight Index is to improve diets and nutrition in India and provide stakeholders concerned with a tool that: i) tracks the contribution of the F&B industry to addressing the burden of nutrition challenges of obesity and diet-related diseases, undernutrition and micronutrient deficiencies and ii) can be used to hold the rated companies to account for delivering on their commitments to tackle these important national nutrition challenges.

5.2 Basis of, and approach to developing, the India Spotlight Index methodology

The India Spotlight Index 2020 is based on the Global Index 2018 and India Spotlight Index 2016. It incorporates the same elements and takes the same broad approach to assessing companies, and to scoring and ranking them, but is adapted to the present Indian context. Additionally, unlike the India Spotlight Index 2016, this Index does not have a BMS marketing assessment element. The 2016 BMS marketing assessment in India showed the high standards of the Indian IMS Act and

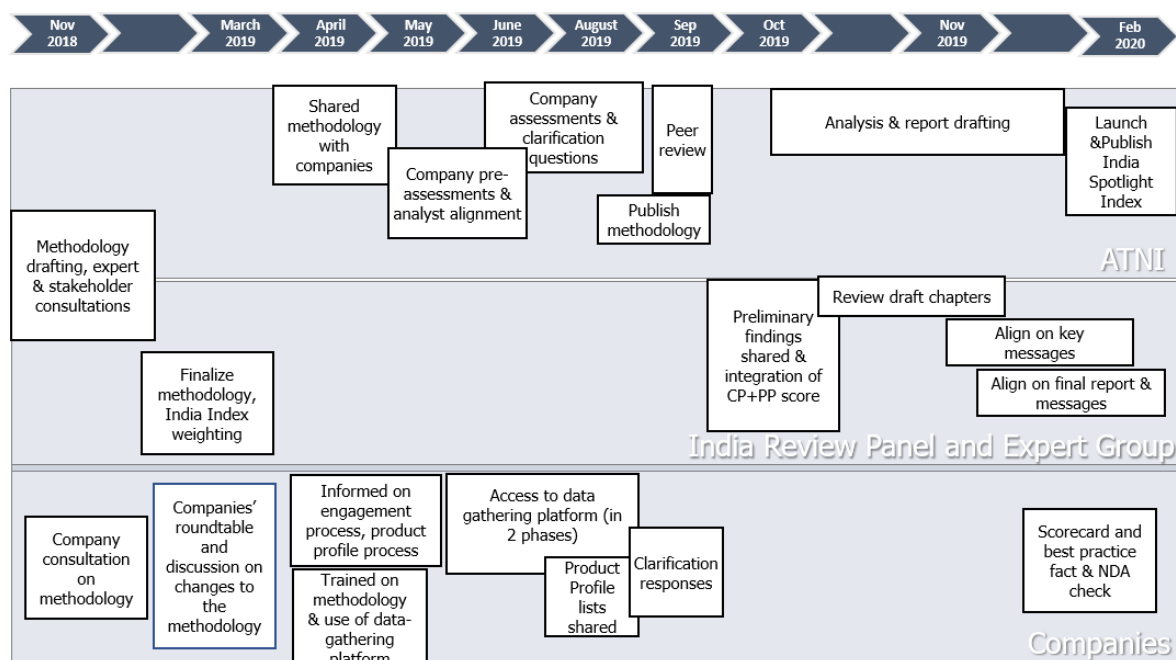
resulted in relatively good compliance by companies. ATNI has limited resources to do on-the-ground assessment of BMS marketing practices and seeks to cover different markets for the next assessments.

ATNI determined how the Corporate Profile of the Global Index methodology should be adapted to take account of the specific legal, regulatory and business context in India, and the specific nutrition challenges the country faces, through desk-based research and stakeholder consultations in April 2017, November 2018, March 2019 and July 2019. Stakeholders consulted included previously assessed companies, industry associations, civil society organizations and academics (see the full list in Appendix II).

In addition, ATNI convened an India-specific Review Panel to provide advice on all aspects of Index development and methodology adaptation (see Appendix III for the list of members of the Indian Review Panel). ATNI also sought advice from its global Expert Group on relevant aspects of the methodology. Simultaneously, ATNI began collecting data for the Product Profile assessment in partnership with TGI and Innova Market Insights.¹⁰ This process is described further in the Product Profile section in chapter 6.

Figure 7 shows steps in the engagement process leading to the publication of the India Spotlight Index 2020.

Figure 7: Engagement process with stakeholders



¹⁰ [Innova Market Insights](#) is a global knowledge leader in the food and beverage industry and has built an extensive tracking system for new food and beverage product launches in more than 75 countries.

5.3 Company selection

The India Spotlight Index 2020 ranks the 16 largest food and non-alcoholic beverage manufacturers active in the Indian market: Adani Group (Adani Wilmar), Britannia Industries Ltd (Britannia Industries), Coca-Cola India, Emami Agrotech Ltd (Emami), Gujarat Co-operative Milk Marketing Federation Ltd (GCMMF Amul), Hatsun Agro Product Ltd (Hatsun Agro), Hindustan Unilever Ltd (Hindustan Unilever), ITC Ltd (ITC), Karnataka Cooperative Milk Producers Federation Ltd (KMF Nandini), Marico Ltd (Marico), Mondelez India Foods Pvt Ltd (Mondelez India), Mother Dairy Fruit & Vegetable Pvt Ltd (Mother Dairy), Nestlé India Ltd (Nestlé India), Parle Products Pvt Ltd (Parle), PepsiCo India Holdings Pvt Ltd (PepsiCo India) and Tamil Nadu Cooperative Milk Producers Federation Ltd (Aavin TCMPF). Together, they accounted for over 31% of the packaged food and beverage market share in India in 2018 with combined retail sales of just over INR 1,800 billion.¹¹

Based on feedback received from stakeholders in India after the 2016 Index unanimously advising to increase the number of national companies in the assessment and on available resources, it was determined that sixteen of the largest food and non-alcoholic beverage manufacturers in India will be assessed and ranked in the India Spotlight Index 2020. Nine of these companies were also assessed in 2016. All Access to Nutrition Indexes assess the largest manufacturers globally or in an individual market, based on sales (data extracted from Euromonitor International's 2018 industry publications of: Packaged Food, Hot Drinks and Soft Drinks), as these companies have the greatest influence among processed-food producers on consumers' diets. The companies selected for the India Spotlight Index 2020 are listed in Table 1.

Table 1: Selected companies for the India Spotlight Index 2020

Company Name	Included in 2016	Included in 2020	Indian HQ	Industry Segment*
Aavin TCMPF	No	Yes	Chennai, Tamil Nadu	Dairy
Adani Wilmar	No (fortification only)	Yes	Ahmedabad, Gujarat	Edible oil
Amul GCMMF	Yes	Yes	Anand, Gujarat	Dairy
Britannia Industries	Yes	Yes	Bangalore/Bengaluru, Karnataka	Mixed portfolio
Coca-Cola India	Yes	Yes	Gurgaon/Gurugram, Haryana	Mixed portfolio
Emami Agrotech	No	Yes	Kolkata, West Bengal	Edible oil
Hatsun Agro Product	No	Yes	Chennai, Tamil Nadu	Dairy
Hindustan Unilever	Yes	Yes	Mumbai, Maharashtra	Mixed portfolio
ITC	No (fortification only)	Yes	Kolkata, West Bengal	Mixed portfolio
KMF Nandini	No (fortification only)	Yes	Bangalore/Bengaluru, Karnataka	Dairy

¹¹ Derived from Euromonitor International's 2018 industry publications of: Packaged Food, Hot Drinks and Soft Drinks.

Marico	No	Yes	Mumbai, Maharashtra	Edible oil
Mondelez India	Yes	Yes	Mumbai, Maharashtra	Mixed portfolio
Mother Dairy	Yes	Yes	Noida, Uttar Pradesh	Dairy
Nestlé India	Yes	Yes	Gurgaon/Gurugram, Haryana	Mixed portfolio
Parle Products	Yes	Yes	Mumbai, Maharashtra	Mixed portfolio
PepsiCo India	Yes	Yes	Gurgaon/Gurugram, Haryana	Mixed portfolio

* Companies are grouped in this Index in three different industry segments with at least three companies: dairy, edible oil or mixed portfolio, based on the type of products they predominantly sell (i.e. contributing 80% or more to their total F&B sales).

Of the 16 manufacturers selected for the second India Spotlight Index, most sell a wide range of food and non-alcoholic beverage products and have diverse product portfolios. Five companies predominantly sell dairy-based products (Aavin TCMPE, Amul GCMMF, Hatsun Agro Product, KMF Nandini and Mother Dairy). Three companies have edible oil products (Adani Wilmar, Marico and Emami Agrotech) as their largest-selling product category. Remaining companies are classified as companies with mixed portfolio of products. Some of the selected companies also sell a substantial amount and diversity of non-food products in India but have been selected for this Index based on high sales revenue from food and non-alcoholic beverage products only.

6. Key India Spotlight Index 2020 elements

This section outlines how the methodology of the Corporate Profile, including the Product Profile, was adapted for the India Spotlight Index 2020 to reflect the specific legal, regulatory and business context in India, and the specific nutrition challenges the country faces. For each element, the limitations faced in the application of the methodologies are also explained.

6.1 Corporate Profile methodology: adaptation and changes since 2016

The Corporate Profile methodology was adapted to take into account Indian laws, regulations, standards and guidance where they exist. This means that national guidelines and standards are applied in the India Spotlight Index methodology, supplemented by international guidelines, standards and frameworks for aspects that are not covered by relevant national guidance or where national guidance is less strict. The applied guidelines, standards and frameworks do not constitute legal requirements for companies but describe best practices or provide recommendations that can be voluntarily followed by companies.

The stakeholder consensus at the time of the India Spotlight Index 2016, and again for the 2020 Index, focused on topics of great importance and relevance in India, including food fortification to tackle undernutrition and micronutrient deficiencies, consumer education, clean water and sanitation, food safety and companies' approach to corporate social responsibility (CSR). These elements were addressed and updated in the current methodology. The following section highlights the key Corporate Profile differences in this edition of the India Spotlight Index as compared with the Global Index 2018 and with the previous India Spotlight Index 2016.

Key differences compared with the Global Index 2018 Corporate Profile:

1. To retain comparability with the Global Index, the overall structure and categories of the India Spotlight Index 2020 Corporate Profile are similar to the Global Index but adapted to the Indian context. It has fewer and simplified indicators in comparison to the Global Index. The approach means that, for global companies, the extent to which their global policies, practices and targets adhere to the Indian context is assessed.
2. Rather than assessing what companies do to address the nutrition and health needs of 'low-income populations' as in the Global Index, the India Spotlight Index has focused on population groups from all regions of India that are experiencing or are at high risk of any form of malnutrition. Based on socioeconomic, geographic (urban/rural, states, districts, etc.) and health/nutritional status differences in India, groups can be identified as experiencing malnutrition or are at high-risk; for

example, based on information found in [Reserve Bank of India's \(RBI\) Handbook of State Statistics](#), National Institution for Transforming India (NITI) Aayog's [aspirational districts program](#), [National Nutritional Strategy booklet](#) and various other Government of India websites such as the sites of the [Ministry of Women and Child Development \(POSHAN Abhiyaan\)](#) and the [Food Safety and Standards Authority of India \(FSSAI\)](#).

3. Access to Nutrition Indexes do not assess compliance with the law. However, when the law is found to be limiting in scope and/or absent, relevant international guidance is applied. Thus, in India, wherever applicable national food safety and standards regulations do not apply and/or are limiting in comparison to international guidance such as the CODEX or WHO South-East Asia Region Nutrient Profile Model for marketing to children, indicators enquiring about companies' voluntary efforts to meet best practice recommended by international guidelines was questioned.

4. In addition, several India-specific nutrition topics have been incorporated in the Corporate Profile methodology. These include:

- What companies do to address public-health priorities set out in NITI Aayog's National Nutrition Strategy and POSHAN Abhiyaan.
- Whether companies follow FSSAI guidance in fortifying products or pledging to FSSAI to reduce nutrients of concern such as certain fats, salt and added sugar in formulating or reformulating their products. For example, as FSSAI provides guidance on fortification of staples (such as oil, wheat, milk and rice), ATNI enquires if companies who sell staple packaged products follow this guidance. For other products, companies are asked if they follow international guidance such as CODEX.
- Whether companies have a robust food safety management system or food safety certifications

5. In Category G, specific indicators (Criterion G1) have been modified in relation to companies' engagement with policymakers. Companies were asked to describe their commitment to respond positively and actively to governmental requests and to not campaign against government efforts that aim to improve nutrition and public health. In addition, they were requested to disclose their position on public policy on relevant issues to the F&B industry and consumers of India.

Key differences compared with India Spotlight Index 2016 Corporate Profile methodology:

1. In the India Spotlight Index 2016 the overall ranking matrix presented companies' performance on two elements: the Corporate Profile and the Product Profile. The India Spotlight Index 2020 has only one integrated scoring and ranking element, which integrates the Product Profile assessment results in Category B of the Corporate Profile. It constitutes Criterion B1 and includes:

- The assessment of the overall healthiness of the product portfolio, measured as the sales-weighted mean HSR score.

- The assessment of the companies' performance within product categories, relative to competition, measured as the mean within-product category score.
- The assessment of the change in product portfolio healthiness compared with the 2016 Product Profile.

The first two elements were added as scored elements of the Product Profile assessment and account for 20% of the overall India Spotlight Index weighting. The third element was not scored. The scoring and weighting algorithm is explained in section 6.2.

2. The India Spotlight Index 2020 Corporate Profile has a smaller number of overall indicators in comparison to India Spotlight Index 2016 (Table 2). Related commitment and performance indicators have been integrated, and disclosure indicators have been linked to their commitment/performance counterpart accordingly.

Table 2: India Spotlight Index 2020 total number of indicators

Category	No. of indicators – 2016 methodology	No. of indicators – 2020 methodology	Difference
A	24	16	8
B	22	18	4
C	17	11	6
D	24	21	3
E	15	14	1
F	10	10	0
G	9	9	0
Total	121	99	22

3. The India Spotlight Index 2020 Corporate Profile does not include a separate section on undernutrition, unlike the previous Index. Instead, an integrated assessment of F&B manufacturers' approach to addressing all forms of malnutrition – with the intent to capture the double burden of malnutrition including undernutrition, micronutrient deficiencies and obesity and diet-related diseases – is assessed across all categories.

4. The India Spotlight Index 2020 Corporate Profile encourages companies to have robust commercial strategies, policies and practices to improve nutrition and health and to achieve nutrition-related SDG goals in India. Thus, this Index has reduced emphasis on indicators asking for companies' non-commercial strategies, policies and practices. These indicators have now been linked to their commercial counterpart and are only credited as 'bonus' elements to companies' commercial principles and practices, i.e. these indicators are not necessary nor sufficient to achieve the maximum score, but they can make a modest contribution to (suboptimal) company scores.

5. Since the India Spotlight Index 2016, new regulations and guidance have been developed nationally and internationally. They have been referred to across all categories of the 2020 India Spotlight Index. The national policies and national/international guidance references used include:

- National Nutrition Strategy 2017 and main nutrition priorities listed therein, and POSHAN Abhiyaan (to improve maternal, child and adolescent nutrition in India);
- FSSAI's Fortification Standards and guidance on staples (rice, wheat, maida, milk, oil): Guidance supported by the recently established Food Fortification Resource Centre (FFRC) for staples fortification;
- FSSAI's Food Safety and Standards (Advertising and Claims) Regulation 2018 (compliance from July 1, 2019);
- FSSAI's expert group report on consumption of fat, salt and sugar and recommendations on manufacturing, voluntary reformulation, processing and labeling of packaged products (draft of labeling regulations has been released);
- Food Safety and Management Systems: ISO 22000:2018 updated from ISO 22000:2005;
- International Chamber of Commerce (ICC) Advertising and Marketing Communications Code and updated Framework for Responsible Food and Beverage Marketing Communications 2012; Advertising Standards Council of India (ASCI) Code; and
- the Food & Beverage Alliance of India (FBAI) Pledge for responsible marketing to children and WHO South-East Asia Regional Office (SEARO) nutrient profile model criteria for marketing products to children.

6. In addition to the changes described for Category B in relation to the integration of the Product Profile, several other specific changes have been made in other categories. These include:

- Category A: This category has several reorganized and new indicators aligned with India's National Nutrition Strategy 2017 and POSHAN Abhiyaan. Some elements of food loss and food waste have been introduced as well, to draw attention to the touch points between nutrition and the wider topics related to food systems and sustainability.
- Category C: Along with indicators to capture companies' commitments and practices to deliver affordable, healthy products, this category has added emphasis on physical accessibility of healthy products and products to address micronutrient deficiencies for all consumers. Inadequate access to healthy food puts them at a greater risk of suffering from various types of malnutrition. To capture this, indicators have been introduced that ask companies about their commitments and practices to reach these populations. In addition, specific questions to reach [aspirational districts](#)¹² across various States of India have been introduced.
- Category D: In an effort to streamline the Index and cohesively capture all aspects of marketing aimed at all consumers, the India Spotlight Index 2020 has three (instead of four) criteria in Category D – D1 Marketing policy: General aspects of responsible marketing, D2 Marketing policy: Specific arrangements regarding responsible marketing to children including adolescents (to cover all under the age of 18 years), and D3

¹² Aspirational districts are the districts identified by NITI Aayog in their 'Transformation of Aspirational Districts' program that aims to expedite development in these priority districts.

Auditing and compliance with policy. To align with the recent changes made in the ICC Code for responsible marketing to children which now includes teens ([Article 18 – ICC Advertising and Communication Code](#)), Criterion D2 has expanded its scope to include children of all ages under the age of 18.

- Category E: In this category, specifically in Criterion E1, indicators asking about companies' employee wellbeing policies and practices have been extended in scope to include other actors from across the food supply chain, who may be direct or indirect employees of the food and beverage manufacturers. This category has also introduced elements of nutrition literacy in Criterion E3.
- Category F: To acknowledge the similarities between Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997 (last modified 2013) and FSSAI's new Food Safety and Standards (Advertising and Claims) Regulation 2018 (implemented since July 2019), in Criterion F2 ATNI has modified indicators to capture companies' preparations towards the new regulation. This category also acknowledges FSSAI's other draft regulations on packaging and labeling.
- Category G: ATNI has extended the scope of stakeholder interactions of companies to include formal long-term partnerships that companies have engaged in to achieve better nutrition for all consumers.

7. Lastly, in the India Spotlight Index 2020, the [World Health Organization's \(WHO\) South East Asia Regional Office \(SEARO\)](#) nutrient profile model was applied to determine products suitable for marketing to children. The previous Index applied the WHO EURO region criteria as the WHO SEARO model was not yet published.

6.2 India Spotlight Index Methodology structure

The structure of the India Spotlight Index 2020 Corporate Profile methodology is largely the same as for all previous Indexes. It has the same three Sections and the same seven categories (A–G) as other Indexes. However, several revisions were made to the criteria and indicators, as described above, to incorporate the Product Profile results in Category B, to align with Indian national guidelines, norms and accepted good practices, and to incorporate feedback from the previous India Spotlight Index 2016. Table 3 shows the 2020 India Index Corporate Profile Sections including integrated elements of the Product Profile all Categories and their revised weightings, and all Criteria, as agreed with the India Review Panel and ATNI's global Expert Group.

Appendix I of this document contains a detailed list of the indicators used for the India Spotlight Index 2020. This list was shared with the assessed companies in April 2019.

Table 3: India Spotlight Index 2020 Corporate Profile methodology overview

Category (weight in total score)	Description	Criteria
Section1: Nutrition governance and management		
A (12.5%)	Corporate strategy, management and governance	A1 Corporate nutrition strategy
		A2 Nutrition governance and management systems
		A3 Quality of reporting
Section 2: Formulating and delivering appropriate, affordable, accessible products		
B (35%)*	Formulating appropriate products	B1 Product Profile results** (20%)
		B2 Product formulation (7.5%)
		B3 Defining healthy and appropriate products (7.5%)
C (15%)	Delivering affordable, accessible products	C1 Product pricing
		C2 Product distribution
Section 3: Influencing consumer choice and behavior		
D (20%)	Responsible marketing policies, compliance and spending	D1 Marketing policy: General aspects of responsible marketing, relevant to all consumers
		D2 Marketing policy: Specific arrangements regarding responsible marketing to children and teens
		D3 Auditing and compliance with policy
E (2.5%)	Supporting healthy diets and active lifestyles	E1 Supporting employee health & wellness
		E2 Supporting breastfeeding mothers at work
		E3 Supporting consumer-oriented healthy eating and active lifestyle programs
F (10%)	Product labeling and use of health and nutrition claims	F1 Product labeling
		F2 Health and nutrition claims
G (5%)	Influencing governments and policymakers, and stakeholder engagement	G1 Engaging and influencing governments and policymakers
		G2 Stakeholder engagement and partnerships

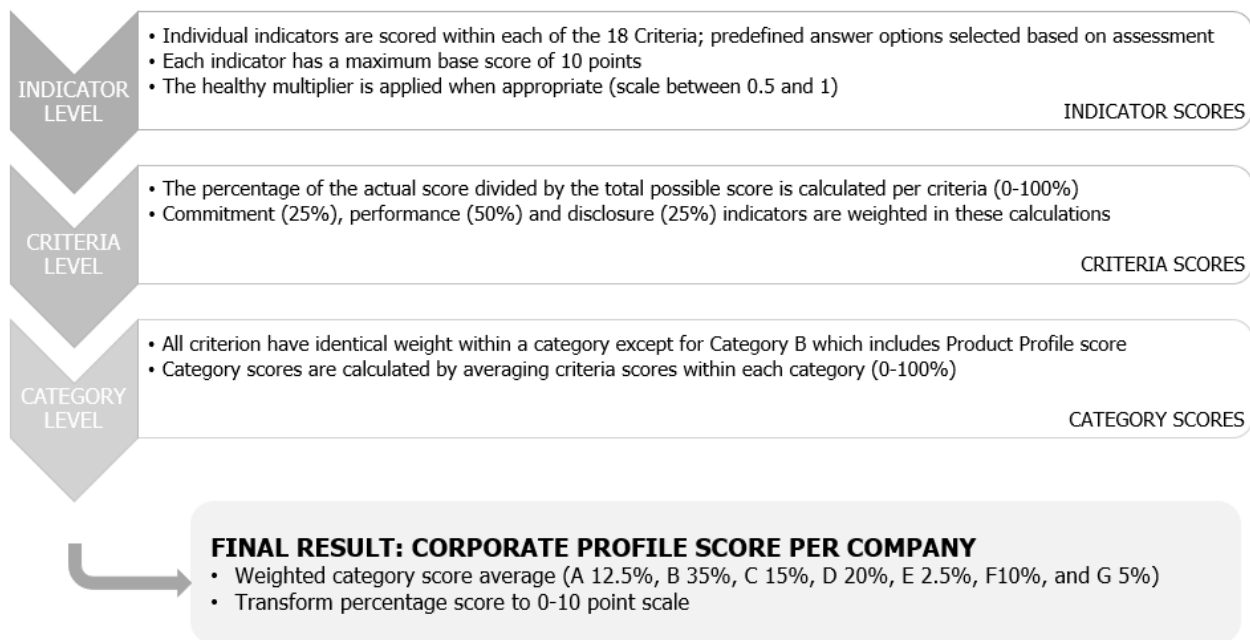
* Category B is the only category that does not have equally weighted criteria as indicated in parentheses behind the criteria names, due to the integration of the Product Profile scores (Criterion B1).

** Criterion B1 will be scored based on the outcomes of the Product Profile assessment that will be performed by The George Institute. The Product Profile will assess nutrient quality of products available in Indian supermarkets based on preselected nutrient profiling systems described in chapters 3, 4 and 6.

Approach to India Spotlight Index 2020 scoring and weighting

As described in chapter 5, a company's Corporate Profile score is calculated by deriving scores from the indicator level. Figure 8 presents the steps taken to calculate each company's final Corporate Profile score.

Figure 8: Corporate Profile scoring algorithm



Limitations to the Corporate Profile methodology

The definition of healthy products and (re)formulation targets

Many aspects of the Corporate Profile methodology depend on companies' own definitions of healthy products, for instance in relation to commitments to deliver more healthy products, strategies to improve the affordability and accessibility of healthy foods, etc. The Product Profile, now integrated into the Corporate Profile and overall score and ranking, provides an objective assessment of the healthiness of products according to validated methods, based on the HSR and WHO SEARO systems. Companies should use the WHO SEARO system, relevant for the Indian market, to identify products that should not be marketed to children. Companies are encouraged to use the HSR system as a NPS to calculate healthiness scores or use it as a benchmark against any internal NPS that may be more specific to the company portfolio or to guide product reformulation. Therefore, the rigor of how companies define 'healthy' products and (re)formulation targets is assessed through analysis of the NPS that companies apply and whether these correspond with or are benchmarked against the HSR and WHO SEARO systems.

Differences in companies' scope to reformulate

Companies differ in the scope of improvements they can make to the nutritional quality of their products depending both on the nature of their product portfolio and the magnitude of previous efforts. For example, a company with a product portfolio of relatively high nutritional quality has less scope to make improvements to its portfolio compared to a company that has a portfolio of lower nutritional quality. This difference limits the ability to compare the scope or magnitude of companies' commitments to improve product formulation. Therefore, companies are assessed on the level of comprehensiveness and transparency of their commitments and targets to improve the nutritional quality of their product portfolios. The assessment of the performance element of product reformulation targets, i.e. how well they are meeting these targets, has been replaced with the Product Profile assessment, which provides a more fair and objective analysis of the healthiness of company portfolios.

Company commitments and self-reported performance

The Corporate Profile relies to a large extent on companies' self-reported information and data. This is the case throughout the methodology, but it is particularly important in Category D, which addresses responsible marketing practices. Companies can only achieve a full score in Category D if they make public commitments, show evidence of performing in line with those commitments and if they have commissioned third-party audits of their marketing practices.

Company assessment

Due to the interactive nature of the ATNI Corporate Profile research process, as described in previous sections, it is not feasible to perform company assessments (coding) *in duplo*, i.e. by two independent analysts. Instead, an internal peer-review system is applied to ensure that the assessments for all indicators in the methodology are checked for accuracy and consistency across all companies.

Comparability with the previous India Spotlight Index

Due to integration of the Product Profile scores in the Corporate Profile and a significant number of structural changes to the Corporate Profile, it is challenging to draw comparisons between the 2016 and 2020 Indexes. However, in general, scores and relative performance per category or topic area can still be compared, e.g. regarding Product Profile results, as well as comparisons between individual indicators that remained unchanged. ATNI will provide qualitative assessments of areas of progress (or lack thereof) per company for those that were included in the India Spotlight Index 2016.

Product Profile Methodology

The India Product Profile utilizes the Indian products dataset collated from Innova Market Insight and the Food Policy Division of The George Institute (TGI). Innova Market Insight's database is

used in this Index for the first time. A full description of the methodology for the TGI Product Profile assessment for this Index will be published with the launch of the India Spotlight Index 2020.

For the India Spotlight Index 2020, the five largest product categories (by sales revenue) of the 16 companies are assessed, which cover the vast majority of their India sales. This is to avoid assessing niche products with low levels of sales, which make a small contribution to Indian diets. Nutrition data held in the TGI 'FoodSwitch' India database and Innova Market Insight India database are used, supplemented with information submitted by some of the companies. Similar to the process of the previous India Spotlight Index, two sets of results for each company are made: one to determine the nutritional quality of companies' products, by applying the HSR both at the category and portfolio level, and another by using the WHO SEAR nutrient profile model to determine what percentage of products assessed overall, and within each category, are suitable to be marketed to children. ATNI weighs these results using the Euromonitor International product category-level sales figures (data extracted from Euromonitor International's 2018 industry publications of: Packaged Food, Hot Drinks and Soft Drinks) to obtain a sales-weighted average per company.

Each company's India Product Profile score is calculated by doubling the sales-weighted HSR score (a maximum of 5) to arrive at a score between 0.5 and 10. In addition, the relative performance of companies within product categories in which two or more companies are active is scored based on the company's rank within the category¹³. Both elements are integrated into the Corporate Profile scoring as Criterion B1, which carries 20% of the overall Corporate Profile weight. An assessment of change in scores and nutrient levels within product categories since 2016 will be performed as well, as an unscored, descriptive element of the India Spotlight Index 2020. The full TGI Product Profile report, to be published with the India Spotlight Index 2020, will explain in more detail how the sales-weighted HSR score and the within-category comparison scores are derived. Product Profile scores and ranking will be presented as part of the Corporate Profile.

Limitations to the Product Profile methodology

The limitations of the Product Profile will be set out more fully in the full TGI Product Profile report, to be published with the India Spotlight Index 2020. In summary:

Nutrition data

Some companies may not provide a full list of the products to be included in this study nor complete nutrition content data. If real values are missing for some nutrients, proxy values are used. The most likely impact of using these proxy values is underestimation of the real differences between products (because proxy values are imputed at the sub-category level), and correspondingly underestimation of the real differences between companies. Some products can be

¹³ Rankings based on the mean HSR score are calculated per category. The rank is converted into a score by inverting the rank and converting it into a percentage between 0-100%. For example, a company that ranks first among five companies (1/5) within a category has an inverted rank of 5/5, leading to a score of 100%. A company that ranks fourth out of five has an inverted rank of 2/5, leading to a score of 40%. To compensate for companies having an unfair advantage if only 2 companies are active in a category, scores of 75% and 25% have been assigned for ranks 1 and 2. Exceptions are made for categories with a mean HSR of 3.5 or higher (the healthy threshold), in which scores between 80-100% are assigned.

excluded from the analysis when data is not available on the content of specific nutrients necessary to apply the nutrient profiling models.

Scope of products covered:

Ideally the analysis would include all products sold by all 16 companies rather than being restricted to only their top five selling categories. Nevertheless, the coverage provided by these five categories of all companies' overall sales is quite high, thereby providing a reasonably robust indicator of the healthiness of their entire Indian portfolios.

More specific sales data

Product-level sales data should ideally be used to calculate the sales-weighted figures, rather than the product category-level sales data that is currently used. However, a dataset with that level of detail is not presently available to ATNI.

Nutrient profiling models used

Two nutrient profiling models have been selected: the HSR model to assess products' nutritional quality and the WHO SEARO model to assess products' suitability to be marketed to children. Using the latter may affect the results for some companies when comparing with the 2016 Index since in the first Spotlight Index the WHO Euro model was used. The HSR model has not significantly changed since 2016. Both the nutrient profiling models are subject to ongoing evaluation and refinement. Discussion continues about how the models used apply to some food categories. The HSR model does not score some products such as tea and instant coffee, which in their pure form without added sugar, cream or milk have little nutritional value; as a result, these products have not been included in the analysis. This means that the results for companies such as Hindustan Unilever and Nestlé India are based on their sales excluding these products, which represent a large proportion of their sales. Plain water, on the other hand, is given a maximum HSR of 5 to encourage its consumption. Baby foods and minimally processed agricultural products are also excluded from this assessment, as the two selected nutrient profiling models are not designed to assess these specialized products.

Serving size of products not considered

The nutrient profiling models used do not 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 actual amount recommended – the serving size – is designed to limit 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 means that, currently, it is not possible to consider serving size with the models used for this assessment. This may also account for the differences between the numbers of healthy foods identified by this assessment and by the companies using their own models.

Other research limitations and considerations

In addition to the methodological limitations described above, some research considerations should be taken into account:

Non-disclosure agreement (NDA)

Some of the data shared by companies was provided under NDA and thus cannot be referenced explicitly in the Index report to be published in 2020. However, it is considered in the analysis to arrive at the companies' scores.

Limited or no disclosure:

Some companies may disclose limited or no information at all publicly. For them, provisions to share information with ATNI under NDA are available. (Companies that do not use the option to engage in ATNI's research process are marked in figures that show rankings in the Index report and on company scorecards¹⁴ to indicate that the assessments are based solely on publicly disclosed data.) Scores for companies with limited or no disclosure may be lower than for those that disclose a lot of information. Consequently, they may not be representative of what the companies do. The India Spotlight Index aims to stimulate transparency and public disclosure of relevant information regarding nutrition and health. Based on observations of increased public disclosure across several iterations of the Access to Nutrition Global Index, increases in public disclosure by companies are anticipated for current and future India Spotlight Indexes.

Different financial years and time periods assessed

Since companies often have different financial years and timetables for their corporate reports, some relevant data may not be published in time to be included in the research. Information that is published or disclosed to ATNI after August 2019 is not included in the assessment.

Time constraints

Completing the Corporate Profile assessment survey and providing feedback on the Product Profile product lists requires significant time from the companies. Companies dedicate different levels of resources to engage with ATNI during the research process, and time constraints may limit the amount of relevant information that companies are able to share, beyond the information that was publicly available.

¹⁴A separate scorecard – summary document – is published for each company that sets out all the analysis of that company. It combines graphs, data and narrative description of the Index results. The front page of each company's scorecard, summarizing the company's strengths and areas for improvement and the full scorecard will be made available on ATNI's website when the India spotlight Index 2020 is launched.

7. India Spotlight Index 2020 research methods

This chapter sets out how the research was conducted for distinct elements of the India Spotlight Index 2020. It explains how the research was undertaken, and how the accuracy and validity of the results was assured.

7.1 Corporate Profile assessment

The research process for the India Spotlight Index 2020 Corporate Profile assessment began in November 2018. From the start of the process, ATNI has been interacting with all the companies through company consultations for the development of the methodology and gathering data for the preassessments. The companies are also consulted in the final reporting phase before publication. This approach, with companies as one group of stakeholders among various other groups of key stakeholders, is part of the multi-stakeholder approach that ATNI applies for all Indexes it publishes.

In November 2018, ATNI initiated a stakeholder consultation process to revise the methodology, in which F&B companies selected for the India Spotlight Index 2020 were informed of the plans and were offered the opportunity to provide input. After finalizing the methodology and selection of the largest F&B companies to be included in the Index in March 2019, all companies were formally invited to a roundtable discussion at which the first draft of the Corporate Profile methodology and the entire Index planning were discussed. This was done to enable companies to engage in the research process on a voluntary and cost-free basis to ensure the independence of the Index. As part of this engagement, companies were also offered the opportunity to enter into an NDA with ATNI, which provided legal safeguards in case the company chose to provide information and evidence to ATNI that may not be publicly available.

Between June and September 2019, ATNI research analysts gathered public information from corporate websites and third-party sources that were referred to by companies. This information, source documents and preliminary assessments are saved on an online data-gathering platform. ATNI provided companies access to this platform and offered training on how to use it. Companies were requested to comment on the initial assessment made by ATNI based on publicly available data, and to provide additional relevant information and supporting evidence via the platform. This information, provided it is supported sufficiently with evidence, was accepted by ATNI for the assessment of Commitment and Performance indicators, but not for Disclosure indicators, as the latter requires public disclosure of information. After reassessment of the data by ATNI, all companies were again asked to provide clarification and/or additional evidence in response to

further ATNI queries through the online platform. New information and source documents were accepted if published before the research deadline. For the India Spotlight Index 2020, the closing period for acceptance of new information was the end of August 2019.

It is worth noting that across the various sections and categories of the assessment, companies' global commitments were credited where they apply to, and were relevant in, India. However, measures of performance, e.g. progress against targets and indicators related to public disclosure, were only credited if India-specific data was reported or published.

Moreover, all relevant information gathered in the company interaction process and the analyst interpretation stage were recorded on the data-gathering platform. For all assessments, individual email communication, in-person technical support and follow-up with companies occurred as needed.

The completeness and correctness of the data collected is a particularly important aspect of ATNI's quality-assurance process. The companies were the relevant sources of this type of information and, therefore, the interactive process of collecting data and obtaining clarification from them was designed to ensure that the data used for the assessment was complete and correct. In reporting the results, companies that do not engage with ATNI are marked in graphs that show rankings and on company scorecards.

Product Profile assessment: Criterion B1

ATNI commissioned the Food Policy Division of The George Institute to undertake the Product Profile research for the India Spotlight Index 2020. This was also done for the India Spotlight Index 2016, Global Index 2018 and the U.S. Spotlight Index 2018. TGI is uniquely placed to do the research because of its flagship FoodSwitch program, a growing database of nutrition and labeling information describing over 500,000 packaged and restaurant foods, and its experience in using this database to analyze changes in the healthiness of the food supply of more than a billion people around the world. TGI follows standardized, rigorous research and validation processes. For the India Spotlight Index 2020, the data derived from TGI's FoodSwitch India database is enriched with product data from Innova Market Insight, to ensure the dataset to use for the Product Profile is comprehensive and contains the most up-to-date information.

7.2 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, performance and disclosure. ATNI has a robust quality-assurance process to ensure that the appropriate answer option is selected for each indicator by the analysts and to ensure consistency across companies. This complements measures to ensure that the information the assessments are based on is complete and accurate.

Analysts within ATNI's research team undertake the assessments. The complete assessment of one company, including all indicators within all criteria and categories, are undertaken by a single analyst to ensure optimal knowledge and understanding of the company's context and way of reporting. The internal consistency of company-reported information and data was verified by cross-checking information across related indicators.

After the preassessment of company information, before allowing companies to review and add their information and viewpoints, analysts examine their assessments across all categories, indicators and companies. At the end of the research process, full consistency checks by means of internal peer-review are performed, covering all companies and all indicators to ensure fair and consistent scoring. A single research analyst reviews the assessment of all indicators within one category, across all companies to ensure that a consistent approach was applied. All seven categories are reviewed this way and assessments are revised as needed. Final cross-checking is done by the ATNI research manager and companies are asked to check their own scorecards and best practice examples for factual accuracy.

8. Follow-up

ATNI will follow its standard process after the publication of the India Spotlight Index 2020, similar to that followed after the publication of India Spotlight Index 2016. This includes one-on-one meetings with companies to review results and recommendations, presentation of results at different fora in India including state-level workshops, and publication of thematic 'deep dives' in the specific categories of the Corporate Profile.

ATNI will publish thematic chapters on specific elements of the Spotlight Index and peer-to-peer ranking of Indian companies with a similar product portfolio. A range of stakeholder consultations will be held to gather feedback on the results of the Index and how the methodology for each element could be improved. ATNI will develop proposals for how further revisions could be done and discuss them with the India Review Panel and global Expert Group. Once final revisions are agreed, this methodology document will be updated, as will the data-gathering platform, ready for research for the third India Spotlight Index to begin. This cycle will be repeated following the publication of each Index.

ATNI believes that the India Access to Nutrition Spotlight Index is a valuable and unique tool for stakeholders to use to track the contribution major Indian F&B manufacturers make to addressing the country's substantial and mounting health challenges linked to diet and nutrition. It provides objective, comparable information and data to track the progress the rated manufacturers make over time in improving their policies, practices and disclosure, as well as their products.

Appendices

The appendices comprise:

- Appendix I: India Spotlight Index Corporate Profile methodology 2020
- Appendix II: Organizations consulted
- Appendix III: ATNI India Review Panel and global Expert Group members

Appendix I: India Spotlight Index Corporate Profile Methodology 2020

Definitions:

Healthy multiplier

A healthy multiplier is applied to any scores for commitments or performance indicators relating to 'healthy' products. The multiplier is derived from the company's score on Category B3 (but is not the actual score) and ranges between 0.5 (adjusting the underlying score) and 1 (having no effect on the underlying score).

i. **Additional information**

Some indicators have been listed with additional information indicated with 'i'. This information is used to provide additional clarity on various indicators within all categories and parameters for their assessment.

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 and focus on health and nutrition in the Indian market. Moreover, it looks at whether the company makes a specific reference to population groups already experiencing – or at high risk of experiencing – malnutrition, due to a lack of access to a wide variety of healthy foods. Other key facets analyzed include whether a company's nutrition strategy is thoroughly embedded in its

governance and management systems, as well as the quality of its reporting on the aforementioned topics.

They are 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		
2020	Indicator	Answer
No.	Commitment	
	High-level strategic commitment on nutrition and health	
1	Does the company commit to placing a strategic focus on nutrition and health, articulated in its mission statement and strategic commitments?	Mission statement mentions nutrition and health AND company states a strategic commitment to grow through a focus on nutrition and health
	i. 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 does not need to be publicly disclosed but 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.	Either the mission statement mentions nutrition and health, or a strategic commitment to grow through a focus on nutrition and health
		No clear focus on nutrition and health in mission statement or growth strategy
2 ♥	Does the company commit to delivering more healthy products (according to the company's definition), and making specific references to reach groups that experience or are at a high risk of malnutrition (including undernutrition, micronutrient deficiencies, obesity and diet-related diseases) with healthy products?	Yes, with a clear and specific reference to reach groups experiencing or at high risk of malnutrition
	i. The commitment to delivering more healthy products needs to apply to India. In order to be credited for making a clear and specific reference to reach groups experiencing or at high risk of malnutrition, these groups need to be appropriately defined by the company. Based on socioeconomic, geographic (urban/rural, states, districts, etc.) and health/nutritional differences in India, groups can be identified as experiencing malnutrition or are at high risk, for e.g., based on the following:	Yes, with a broad reference to reach groups experiencing or at high risk of malnutrition
	– Handbooks of Statistics on Indian States (RBI) and NITI Aayog data (especially for socioeconomic factors – poverty levels, states' GDP, urban/rural population division, aspirational districts etc.)	Yes, without reference to reach groups experiencing or at high risk of malnutrition
	– National Nutrition Strategy booklet (highlighting groups and states associated with high burden of undernutrition and micronutrient deficiencies)	Commitment under development
	– National Family and Health Survey-4 – latest data (maternal health, child health, nutrition consumption of adults, etc.)	No commitment
	– Ministry of Women and Child Development data	No information
	Commitment to address malnutrition	

3 (NEW)	Does the company recognize the nutrition and health priorities set out in the National Nutrition Strategy and Vision 2022 (Kuposhan Mukht Bharat) and/or POSHAN Abhiyaan (Prime Ministers’ Overarching Scheme for Holistic Nourishment) as part of India’s National Development Agenda in its nutrition strategy?	Yes, comprehensively
	i. National Nutrition Strategy priorities are: – reducing undernutrition in children (underweight, stunting, wasting), and women & girls (women with low BMI, anemic) – improving health status of women during pregnancy and childbirth – improving infant and young child feeding practices – supporting the girl child – reducing micronutrient deficiencies (vitamin A, iron, iodine and zinc) – improving dietary intake of children – addressing overnutrition: overweight and obesity (especially in urban areas)	Yes, but only referring to some of the priorities
	In addition to these priorities, ATNI also considers it relevant to address the nutrition and health status of women before pregnancy and during nursing/lactation.	No relevant references made
	Monitorable targets mentioned in the strategy to achieve by 2022: 1. Reduce percentage of underweight (below-2SD) in children below 5 years: from 35.7% to 20.7% 2. Reduction in prevalence of anemia in children (5–59 months): from 58.4% to 19.5% 3. Reduction in prevalence of anemia in women and girls (15–49 years): from 53.1% to 17.7% POSHAN Abhiyaan is India’s flagship program to improve nutritional outcomes for children, adolescents, pregnant women and lactating mothers by leveraging technology, a targeted approach and convergence.	No information
Performance		
Nutrition-related business initiatives		
4 4.1 (NEW)	Does the company conduct a nutrition-related business risk assessment at least every two years?	Yes
	i. In order to be credited, the company must explicitly identify nutrition-related risks within its business risk identification and assessment process as it pertains to India. Examples include: – future nutrition-related taxes – impact of future potential nutrition-related litigation – impact of future potential regulation of marketing – impact of future potential regulation of labeling and nutrition and health 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	No
		No information
4.2 (NEW)	Does the company state that nutrition was a factor in the company’s decisions about acquisitions, disposals and forming joint ventures or other partnerships in the last three years?	Yes
		No
	i. In case no acquisitions, disposals and forming joint ventures or other	No information

	partnerships occurred in the last three years, this indicator is not applicable and is removed from scoring.	Not applicable (no such decision in the last three years)
5 ♥	Does the company provide evidence that healthy products contributed positively to its financial performance in India in the last three years?	Yes, by growth of the revenue of healthy products, either in absolute value or relative to the total company revenue
		No
		No information
Business initiatives focused on addressing malnutrition		
6	Has the company undertaken a strategic review in the last three years of the commercial opportunities available to it by addressing the specific needs of groups that experience or are at a high risk of malnutrition, and at what level of the company was it reviewed? i. 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 7. Malnutrition includes undernutrition, micronutrient deficiencies, obesity and diet-related diseases. A comprehensive review covers these elements. The review at Board level should be interpreted as a review by the highest decision-taking body within the company for the Indian market or business entity. For multinational companies not based in India and in case the strategic review is focused solely on India, this may be a different decision body than the global Board of Directors.	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
7	Has the company done market research or other types of studies to assess unmet needs of groups experiencing or at high risk of undernutrition and/or micronutrient deficiencies (which may be addressed through micronutrient fortification and/or the use of fortified ingredients/staples)? i. The objective of the market research or other types of studies, in order to be credited, should be to assess or identify unmet needs in the market that could be addressed commercially. Initiatives aiming for non-commercial or philanthropic approaches are not relevant for this indicator.	Yes, in all states the company is present in
		Yes, in some states it is present in
		No such market studies done
		No information
8 8.1	Does the company’s formal commercial strategy set out how it intends to address undernutrition and/or micronutrient deficiencies (specifically one or more of iron, iodine, zinc, vitamin A, vitamin D, vitamin B12) in groups in which these are most prevalent?	Yes
		No
		No information
		Not applicable
8.2	Does the company’s formal commercial strategy set out how it intends to address issues related to obesity and diet-related diseases in groups in which these are most prevalent?	Yes
		No
		No information
8.3	Has the company dedicated some of its obligatory CSR Act budget and/or has a non-commercial approach to addressing issues related to malnutrition been defined?	Yes, addressing issues related to undernutrition and/or micronutrient deficiencies, and related to obesity and diet-related diseases

		Yes, addressing only undernutrition and/or micronutrient deficiencies
		Yes, addressing only obesity and diet-related diseases
		No, the company pays obligatory CSR funds to the government without monitoring
		No information
Disclosure		
9	Does the company publicly disclose: (Tick all that apply)	A clear statement that its growth strategy is based on an increasing focus on nutrition and health
		Its commitment to delivering more healthy products
		A clear statement in its nutrition strategy that it recognizes priorities set out in the NNS
		The process and/or results of its nutrition-related business risk assessment in India
		Commentary related to nutrition on acquisitions, disposals and forming joint ventures or other partnerships (if applicable)
		Financial performance information on its healthy products in the last three years
		A statement about having undertaken a strategic review and/or conclusion of the strategic review
		Its formal commercial strategy addressing issues related to undernutrition and micronutrient deficiencies (if applicable)
		Its formal commercial strategy addressing issues related to overweight, obesity and diet-related diseases

A2 Nutrition governance and management systems		
	Performance	
	Accountability and responsibility related to company's nutrition strategy and/or programs	
1	To whom (what function) has the company formally assigned oversight for implementing the company's nutrition strategy and/or programs?	CEO or an executive that reports directly to the Board on all aspects of nutrition
	i. For multinational companies not headquartered in India, the nutrition strategy and/or programs should clearly apply to India or should be	A committee that reports to the Board, e.g. Sustainability Committee

	production process. These include, <i>inter alia</i> : i.) including food loss and waste within the key performance indicators (KPIs); ii) applying value stream mapping tools (which help identifying and understanding the flow of materials and information of a product as it makes its way through the value stream) to reduce food losses and wastes in supply chains. Thus, this system is used to identify lean wastes (i.e. defects, overproduction, inappropriate processing, unnecessary inventory, unnecessary motion, transport & 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 tool to quantify and report on food loss and waste 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.	Value stream mapping along the production chain focused in identifying FLW
		Application of the FLW Accounting and Reporting Standard
		Other methods/ please specify which
Disclosure		
5	Does the company publicly disclose: (Tick all that apply)	Accountability (managerial oversight) of its nutrition policy/strategy
		The process and/or results of its audit or management review
		ISO 22000:2018 certification on food safety management systems or similar certification
A3 Quality of reporting		
Performance		
1	Does the company publish formal, regular reports on its overall approach to preventing and tackling nutrition issues in India?	Yes, annually
1.1		Yes, but less frequently than annually
	i. The report or document may be part of a CSR, sustainability or annual report; it does not have to be a separate report. In order to be considered for this indicator, the reports need to be disclosed publicly.	No
2	The company's reporting on preventing and tackling obesity and diet-related diseases in India includes: (Tick all that apply)	A clear sense of the company's nutrition strategy in India and how it relates to overall business strategy and nutrition context of India
2.1		Clear reporting on current performance against all objectives and targets for India
		A clear outlook on future plans and targets for India
		Explanation of the challenges faced, not only success/positive stories
		Information about the impact of its efforts, in terms of those reached
2.2	The company's reporting on preventing and tackling undernutrition and/or micronutrient deficiencies in India includes: (Tick all that apply)	A clear sense of the company's nutrition strategy in India and how it relates to overall business strategy and nutrition context of India
		Clear reporting on current performance against all objectives and targets for India
		A clear outlook on future plans and targets for India

		Explanation of the challenges faced, not only success/positive stories
		Information about the impact of its efforts, in terms of those reached
		Not applicable

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

Category B – Formulating appropriate products

Companies in India can help consumers in making healthier choices by improving the nutritional quality of foods made available to them. In addition to analyzing the healthiness of a company's product portfolio, i.e. Product Profile results in B1, this category addresses companies' efforts towards achieving healthy products through research and development, new product formulation, reformulation of existing products, and tackling undernutrition and micronutrient deficiencies by developing fortified products or using fortified ingredients. It also assesses the quality of the NPS that the companies use (if any) to guide their product formulation efforts.

This category consists of three criteria:

B1 Product Profile results

B2 Product formulation

B3 Defining healthy and appropriate products

This category carries 35% of the weight of the overall score.

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. No company input needed.
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 Product Profile. No company input needed.
3 (NEW, not scored)	Assessment of the change in product portfolio healthiness compared with the 2016 Product Profile	i. This assessment is part of the Product Profile. No company input needed.

B2 Product formulation ¹⁵		
Commitment		
R&D investment to improve nutritional quality		
1 ♥	What commitment has the company made to invest (or continue to invest) in R&D to improve the nutritional quality of its products in India? (Tick all that apply)	Commitment related to improving the nutritional quality of its products overall or related to addressing obesity and diet-related diseases
		Commitment related to addressing undernutrition and/or micronutrient deficiencies
		Quantitative targets (either with respect to the amount it intends to increase its R&D effort/spending in coming years on nutrition; or the number of new, healthy products it intends to introduce)
Product-reformulation commitment to limit nutrients of concern		
2 (NEW)	Regarding nutrients of concern, has the company: i. FSSAI guidance on limiting nutrients of concern is provided in the 'Report of The Expert Group on Consumption of Fat, Sugar and Salt, and its health effects on Indian population'. This report is aimed to serve as a guideline document for all the stakeholders, including industry, FSSAI and the consumer, in rationalizing the consumption of fat, sugar and salt through processed-food products, and thereby help reduce the burden of diet-related chronic diseases in the Indian population.	Made a public pledge/commitment to reduce quantities of fat, salt and sugar in its products as recommended by FSSAI
		Committed to reformulate its products (not necessarily publicly) aligned with the FSSAI recommendations for reducing high fat, salt and sugar
		Made another relevant commitment to reformulate its products without mentioning or aligning with FSSAI guidelines
		Made no commitment on reformulating products
		No information
Nutrient Reformulation Targets		
3	Salt/sodium targets	
3.1	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)
3.2	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

¹⁵ This criterion asks questions about targets for specific nutrients. If a nutrient is not relevant to a company because it does not make products that include that nutrient, related indicators will be made not applicable.

		The target is externally verifiable (does not rely on company-internal definitions or information for verification)
4	Trans fat targets	
4.1	Has the company set a target to eliminate or reduce industrially produced trans fat, in accordance with WHO or FSSAI guidance? i. WHO recommends to eliminate industrially-produced trans fat and limit the intake of trans fat to less than 1% of total energy intake (for more information see https://www.who.int/nutrition/topics/replace-transfat and https://www.who.int/newsroom/factsheets/detail/healthy-diet). Targets to eliminate industrially produced trans fat (including from partially hydrogenated vegetable oils) or to reduce these to below 1% of energy in the product are considered relevant. FSSAI has launched its, 'Heart Attack Rewind' initiative in 2018, aiming to reduce the trans fat content of a product that contains vegetable oils, vegetable fat and hydrogenated vegetable oil to 2% by weight in 2022.	Target aligns to the WHO recommendation to eliminate industrially produced trans fat Target aligns to FSSAI guidance to limit the maximum amount of trans fat content of a product that contains vegetable oils, vegetable fat and hydrogenated vegetable oil to 2% by weight and, if relevant for the company, extends to all relevant products. Target aligns to WHO or FSSAI guidance to limit the maximum amount of trans fat but it does not cover all relevant company products. Target does not align to WHO or FSSAI recommendation No trans fat reduction target No information Not applicable (explain)
4.2	Tick all that apply:	The company has defined a specific and measurable (quantifiable) target The target encompasses objective criteria or limits based on percentage of energy or weight The target is time-bound The target is externally verifiable (does not rely on company-internal definitions or information for verification)
5	Saturated fat targets	
5.1	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?	The company has set a target to reduce/reach lower levels of saturated fats for all relevant products/sub-categories The company has set a target to reduce/reach lower levels of saturated fats for some relevant products/sub-categories No saturated fat reduction target No information Not applicable (explain)
5.2	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)
6	Added sugars targets	

6.1	Has the company set a target to reduce levels or achieve lower stated levels of added sugars or calories and, if so, in how many products / categories? i. 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.	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
		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 sugar reduction target or calorie reduction target
		No information
		Not applicable (explain)
6.2	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)
Commitment related to addressing undernutrition and micronutrient deficiencies		
7	Has the company committed to help tackle undernutrition and/or micronutrient deficiencies through initiatives that aim to increase the number/volume of fortified products or products otherwise appropriate for undernourished groups or those at risk of micronutrient deficiencies? i. Commitment related to products that are inherently rich in relevant micronutrients and are appropriate to address undernutrition and/or micronutrient deficiencies are considered relevant within the context of this indicator as well.	Yes
		No
		No information
		Not applicable
8	Has the company committed to basing its approach to fortification on Food Safety and Standards (Fortification of Foods) Regulation 2018 and for products not covered by it, on international guidance on fortification (i.e. CODEX CAC/GL 09-1987 or equivalent)? i. FSSAI's Food Safety and Standards (Fortification of Foods) Regulation, 2018, covers iodized salt, iron fortified iodized salt, fortified oil, fortified milk, fortified atta, fortified maida and fortified raw rice. For more information, see: https://www.fssai.gov.in/home/fss-legislation/fss-regulations.html	Yes
		No
		No information
		Not applicable (no fortification is applied or fortification is done under FSSAI regulation only)
9	Has the company committed to seek to use ingredients with high inherent levels of micronutrients (incl. fortified ingredients) to develop products, where relevant?	Yes
		No
		No information
		Not applicable

	i. Ingredients with high inherent levels of micronutrients may include naturally micronutrient-rich ingredients, biofortified ingredients or ingredients that have been fortified otherwise.	
	Performance	
10 ♥	Can the company provide evidence of having introduced new healthy products (according to the company's definition) in the last three years in India? i. The company should provide information about new introductions of products that meet the company's healthy standard. The information is considered 'consolidated data on the number of new healthy products launched' if a comprehensive overview of qualifying products is provided per calendar year.	Consolidated data on the number of new healthy products launched
		Some examples but no consolidated data for new healthy products launched
		No new healthy products launched
		No information
11 11.1	Has the company developed fortified products or products otherwise appropriate to specific groups that address their nutritional needs in the last 3 years in India, aimed at: i. Otherwise appropriate products that aim to address nutritional needs can be products that use ingredients that are naturally rich in relevant micronutrients that help address relevant deficiencies that the target group suffers from or is at high risk of. The overarching principle is that the nutritional composition of the products should meet the specific nutritional needs of the target group(s) selected, to be considered relevant.	Women of childbearing age
		Children under 6–36 months
		Children between 3–5 years
		Children over 6 years
		Other population groups
		None
		Not applicable
11.2	Can the company provide evidence of running or funding philanthropic or non-commercial programs to develop products specifically formulated or appropriate for specific target groups in India that experience or are at high risk of undernutrition or micronutrient deficiencies:	Women of childbearing age
		Children between 6–36 months
		Children between 3–5 years
		Children over 6 years
		Other groups
		None
12 12.1	Does the company sell fortified products covered under FSSAI's Food Safety and Standards (Fortification of Foods) Regulation 2018? i. Relevant fortified ingredients/ products include: iodized salt, double fortified salt (fortified with iron and iodine), fortified wheat flour (atta & maida fortified with iron, folic acid and Vitamin B12, zinc, Vitamin A, Vitamin B1, B2, B3, B6), fortified milk (toned, double toned, skimmed milk, standardized milk fortified with Vitamin A and D), fortified oil (vegetable oil fortified with Vitamin A and D), fortified raw rice (fortified with iron, folic acid, Vitamin B12, zinc, Vitamin A, B1, B2, B3, B6). For more information, see: https://www.fssai.gov.in/home/fss-legislation/fss-regulations.html By 'covering all relevant products in their entire portfolio', the company voluntarily fortifies all the products in its portfolio for which FSSAI guidance applies, and hence, is given full credit. In case companies do not sell products that are covered in the FSSAI regulation, this indicator is not applicable and not scored.	Yes, covering all relevant products in their entire portfolio
		Yes, covering some relevant products in their portfolio
		No
		No information
		Not applicable
12.2	For products not covered under FSSAI's Food Safety and Standards (Fortification of Foods) Regulation 2018, does the company fortify and sell only products of high underlying nutritional quality? i. In case companies do not sell fortified products that are not covered in the FSSAI regulation, this indicator is not applicable and not scored.	Yes
		No
		No information

		Not applicable
	Disclosure	
13	Does the company publicly disclose its: (Tick all that apply)	Commitment on R&D investments Targets on key nutrients (all) Targets on key nutrients (some) Commitment to tackle undernutrition and/or micronutrient deficiencies through targeted fortification of its products (if applicable) A commentary on developing fortified products for undernourished and micronutrient deficient groups (if applicable) A commentary on how the company has used ingredients with high inherent levels of micronutrients and/or fortified ingredients (if applicable) The number of new healthy products launched Reporting on developing products for the undernourished groups and those suffering from or at risk of micronutrient deficiencies in India (if applicable) A statement or commentary that mentions the company fortifies only products of high underlying nutritional quality (if applicable) The percentage of company's products that met its overall healthy standard by 2018 in India By what percentage the number of products that meet its overall healthy standard increased between 2016 and 2018 in India

B3 Defining healthy and appropriate products		
	Performance	
	Company's nutrient profiling system or model/definition of what it considers 'healthy products'	
1	Does the company have a nutrient profiling system or model (NPS)? (For information only, i.e. not scored)	Yes No No information
	If yes:	
1.1	Is this NPS used to guide new product development/reformulation? (For information only, i.e. not scored)	Yes No No information
1.2	Is the NPS used to determine which products can be marketed to children? (For information only, i.e. not scored)	Yes No No information

1.3	Is the same system used for both purposes? (For information only, i.e. not scored)	Yes
		No
		No information
2	Is the company's definition of healthy products based on nutrition criteria within the NPS used? i. 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.	Yes, explicitly based on objective nutrition criteria, covering all products
		Yes, but not all aspects of nutrition criteria are clear or not all products are covered
		No
3	The NPS used to guide new product development or reformulation is:	No information
		A formal internal NPS that calculates overall nutritional quality scores for each product and is used to guide its reformulation program
		A precursor 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 above or below a threshold, but which does not calculate overall nutritional quality
4	Does the company provide evidence that its definition of healthy products, or products that meet its nutrition criteria, aligns with these external benchmarks? (Tick all that apply): i. The WHO SEARO criteria for marketing to children are defined in the World Health Organization's Nutrient Profile Model for South-East Asia Region. For more information, see https://apps.who.int/iris/handle/10665/253459 Only two answer options can be selected – one of the first three options and one of the remaining two options.	No system is in place
		No information
		Its definition of healthy products corresponds with the HSR ≥ 3.5 definition of healthy (smaller than 10% deviation in estimated percentage of healthy products)
5	Which products and categories are covered by the company's NPS?	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 and the deviation with HSR ≥ 3.5 criterion is larger than 10%
		For products marketed to children, its nutrition criteria correspond with regional WHO SEARO criteria for marketing to children or the percentage deviation of products meeting both the criteria is smaller than 10%
6	How does the company publish its NPS to allow consumers and other stakeholders to assess and understand it?	For products marketed to children, its nutrition criteria do NOT correspond with regional WHO SEARO criteria for marketing to children or the percentage deviation of products meeting both the criteria exceeds 10%
		In full and in a peer-reviewed journal
		In full by the company itself

		Limited information or on request only
		Not published

Category C – Delivering affordable, accessible products

Producing healthier options is necessary but insufficient on its own to improve consumers' access to nutritious foods and beverages, and to drive up consumption of such products. Therefore, companies must offer them at competitive prices and distribute them widely to reach all consumers in need, especially those who are vulnerable to malnutrition.





This category assesses companies' efforts to make healthy products more affordable and accessible to Indian consumers with specialized 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 the affordability of healthy products and products to address micronutrient deficiencies	
1 1.1 ♡	Has the company made a commitment to address the affordability of its healthy products? i. The commitment should specifically address the affordability of healthy products, e.g. relative to other products. 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 is relevant for this indicator, and all of Criterion C1. Portion-limited products that do not otherwise meet healthy standards are not considered relevant for this indicator and category overall.	Yes, in a formal policy
		Yes, but not in a formal policy
		No
		No information
1.2 ♡	Has the company committed to commercially addressing the affordability of products designed to reduce micronutrient deficiencies in groups experiencing or at high risk of undernutrition, micronutrient deficiencies and related diseases? i. Aspirational districts: These are the districts identified by NITI Aayog in its 'Transformation of Aspirational Districts' program. http://www.niti.gov.in/content/about-aspirational-districts-programme	Clear commitment made for whole business, with particular reference to aspirational districts and/or low-income groups
		Clear commitment made for whole business, without particular reference to aspirational districts and/or low-income groups
		Broad commitment with particular reference to aspirational districts and/or low-income groups

		Broad commitment without particular reference to aspirational districts and/or low-income groups
		No commitment
		No information
2	Does the company have a clear strategy, and one or more quantitative targets, to improve the affordability of healthy products relative to products not meeting healthy standards?	Yes, has a clear strategy and presence of one or more targets
2.1		Yes, but not in a clear strategy and presence of one or more targets
		No clear strategy and/or targets
	i. Targets considered for scoring may include: Regarding healthy products: – 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	No information
2.2	Does the company have a clear strategy, and one or more quantitative targets, to improve the affordability of products aiming to address micronutrient deficiencies in groups experiencing or at high risk of undernutrition and micronutrient deficiencies?	Yes, has a clear strategy and presence of one or more targets
		Yes, but not in a clear strategy and presence of one or more targets
	i. Targets considered for scoring may include: Regarding products addressing micronutrient deficiencies: – 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 aspirational districts or low-income groups	No clear strategy and/or targets
		No information
		Not applicable
Performance		
Commercial strategies to improving affordability		
3	Has the company done a comprehensive analysis of what appropriate pricing would be for products that meet its healthy standard?	Yes, across all states it is active in with specific attention to aspirational districts and low-income groups.
		Yes, in selected states only with specific attention to aspirational districts and low-income groups
	i. Aspirational districts: These are the districts identified by NITI Aayog in their 'Transformation of Aspirational Districts' program. 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.	Yes, across all states it is active in without specific attention to aspirational districts and low-income groups
		Yes, in selected states only without specific attention to aspirational districts and low-income groups
		No analysis of appropriate pricing conducted
		No information
4	Can the company provide evidence that it has offered discounts, price promotions or coupons on its healthy products at the same or greater rate as for products not meeting its healthy standard?	Yes, across all states it is active in with specific attention to aspirational districts and/or low-income groups.
		

	i. Aspirational districts: These are the districts identified by NITI Aayog in their 'Transformation of Aspirational Districts' program.	Yes, in selected states only with specific attention to aspirational districts and/or low-income groups Yes, across all states it is active in without specific attention to aspirational districts and/or low-income groups Yes, in selected states only without specific attention to aspirational districts and/or low-income groups No No information
5	Can the company provide evidence or examples of improving affordability of products that address micronutrient deficiencies (please specify)? i. Aspirational districts: These are the districts identified by NITI Aayog in their 'Transformation of Aspirational Districts' programme. Please specify the strategy used to make products that address micronutrient deficiencies more affordable, e.g. reduced/set pricing of these products, reduced package sizes, etc.	Yes, across all states it is active in with specific attention to aspirational districts and/or low-income groups Yes, in selected states only with specific attention to aspirational districts and/or low-income groups Yes, across all states it is active in without specific attention to aspirational districts and/or low-income groups Yes, in selected states only without specific attention to aspirational districts and /or low-income groups No No information Not applicable
Disclosure		
6	Does the company publicly disclose: (tick all that apply)	A policy/strategy statement of its approach to improving the affordability of its healthy products A policy/strategy statement of its approach to improving the affordability of its products aimed to address micronutrient deficiencies (if applicable) Targets for improving the affordability of its healthy products relative to other products, for all consumers Targets for improving the affordability of its products aimed to address micronutrient deficiencies (if applicable) Commentary on its approach to identifying appropriate pricing for healthy products Examples of making its healthy products more affordable Examples of making its products aimed to address micronutrient deficiencies more affordable (if applicable)

C2 Product distribution

Commitment		
Improving the accessibility of healthy products and products to address micronutrient deficiencies		
1 1.1 ♡	Has the company made a commitment to address the physical accessibility of its healthy products? i. The commitment should specifically address the physical accessibility of healthy products, e.g. relative to other products. 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 all of criterion C2. Portion-limited products that do not otherwise meet healthy standards are not considered relevant for this indicator and category overall.	Yes, in a formal policy
		Yes, but not in a formal policy
1.2 ♡	Has it committed to addressing commercially the physical accessibility of products designed to address micronutrient deficiencies in groups experiencing or at high-risk of undernutrition and micronutrient deficiencies?	No
		No information
2 2.1 ♡	Does the company have a clear strategy, and one or more quantitative targets, to improve the physical accessibility of healthy products relative to products not meeting its healthy standards? i. Targets considered for scoring may include: – number of new consumers of healthy products to reach through improved distribution – number of groups experiencing or at high risk of malnutrition to reach with healthy products through improved distribution in urban deserts – 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 rural deserts – investment planned in improving accessibility of healthy products	Clear commitment made for whole business with reference to aspirational districts and/or urban slums/rural groups
		Broad commitment with particular reference to aspirational districts and/or urban slums/rural groups
2.2 ♡	Does the company have a clear strategy, and one or more quantitative targets, to improve the physical accessibility of products designed to address micronutrient deficiencies in groups experiencing or at high risk of undernutrition and micronutrient deficiencies? i. Regarding products addressing micronutrient deficiencies: – number of new consumers to reach through improved distribution – number of groups experiencing or at high risk of malnutrition to reach with fortified products – number of units or sales value targets for fortified products related to extended distribution – number of new retail partners to achieve extended accessibility goals – number of consumers to reach with fortified products through improved distribution in aspirational districts	Broad commitment without particular reference to aspirational districts and/or urban slums/rural groups
		No commitment
		No information
		Yes, has a clear strategy and presence of one or more targets
		Yes, but not in a clear strategy and presence of one or more targets
		No clear strategy and/or targets
		No information
		Yes, has a clear strategy and presence of one or more targets
		Yes, but not in a clear strategy and presence of one or more targets
		No clear strategy and/or targets
		No information
		Not applicable

	– investment planned in improving accessibility of products aimed to address micronutrient deficiencies	
Performance		
Strategies to improve the physical accessibility of healthy and appropriate products		
3 ♡	Does the company provide evidence of improving the physical accessibility of healthy products for the general consumer and for groups that lack access due to geographical factors, e.g. isolated rural areas or urban slums?	Across all states the company is active in, with specific attention to aspirational districts and/or urban slums/isolated rural groups
	i. This indicator assesses whether areas that lack access to healthy products (e.g. isolated rural areas) and have been identified by Indian policymakers as vulnerable districts (aspirational districts) are covered in the company's accessibility strategy related to healthy products. Aspirational districts: These are the districts identified by NITI Aayog in their 'Transformation of Aspirational Districts' program. http://www.niti.gov.in/content/about-aspirational-districts-programme	Across all states the company is active in, without specific attention to aspirational districts and/or urban slums/isolated rural groups
	Examples that can be considered for scoring may include:	In selected states only, with specific attention to aspirational districts and/or urban slums/isolated rural groups
	– arrangements/incentives with retailers for prominent shelf positions for its healthy products on a regular basis (not a one-off)	In selected states only, without specific attention to aspirational districts and/or urban slums/rural groups
	– arrangements/incentives with distributors re. how healthy products are distributed	No analysis of physical accessibility has been conducted
	– data to demonstrate that rural retailers are provided with healthy options as standard	No information
	– data to demonstrate that retailers in poor urban areas are provided with healthy options as standard	
4 4.1	Can the company provide examples of improving the physical accessibility of products that address undernutrition and micronutrient deficiencies through commercial activities?	Across all states the company is active in – with specific attention to aspirational districts and/or urban slums/isolated rural groups
	i. Examples that can be considered for scoring may include:	Across all states the company is active in – without specific attention to aspirational districts and/or urban slums/isolated rural groups
	– arrangements/incentives with retailers for prominent shelf positions for its healthy products on a regular basis (not a one-off)	In selected states only – with specific attention to aspirational districts and/or urban slums/isolated rural groups
	– arrangements/incentives with distributors re. how healthy products are distributed	In selected states only – without specific attention to aspirational districts and/or urban slums/rural groups
	– data to demonstrate that rural retailers are provided with healthy options as standard	No analysis of physical accessibility has been conducted
	– data to demonstrate that retailers in poor urban areas are provided with healthy options as standard	No information
	– other examples	Not applicable
4.2	Can the company provide evidence of improving the physical accessibility of products that address undernutrition and micronutrient deficiencies, through non-commercial activities? (Tick all that apply)	Providing products to be distributed to undernourished groups
	i. Non-commercial or philanthropic activities include product donations or providing other types of contributions on a philanthropic basis. Product	Providing products to school feeding programs
		Using its distribution systems to deliver micronutrient powders, supplements, etc.

	sales, including at reduced prices or related to governmental programs, should be assessed as commercial activities in indicator 4.1.	Otherwise supporting programs designed to address undernutrition to reach target groups with appropriate products
		Not applicable
	Disclosure	
5	Does the company publicly disclose: (Tick all that apply)	A policy/strategy statement of its approach to improving the physical accessibility of healthy products A policy/strategy statement of its approach to improving the accessibility of its products aimed to address micronutrient deficiencies (if applicable) Targets to improve the physical accessibility of its healthy products relative to other products for all consumers Targets to improve the physical accessibility of products aimed to address micronutrient deficiencies to groups at experiencing or at high-risk of micronutrient deficiencies (if applicable) Evidence of improving distribution of its healthy products to reach aspirational districts and/or isolated rural areas/urban slums, etc. Examples of making its products aimed to address micronutrient deficiencies more physically accessible to undernourished and/or at high risk groups (commercially) (if applicable) Examples of making its products aimed to address micronutrient deficiencies more physically accessible to undernourished and at high risk groups (non-commercially) (if applicable)

Section 3 – Influencing consumer choice and behavior

Category D – Responsible marketing policies, compliance and spending

This category captures the extent to which companies support all Indian consumers, including children and teenagers, 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 teens

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 responsible marketing policy that applies explicitly to the following media? (Tick all that apply) i. The channel coverage of the responsible marketing policy is assessed in this indicator, whether the policy covers only children, or all consumers (including children). In case all consumers (including children) are covered, and differences in channel coverage apply between audiences, the smallest selection of media is scored.	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/CDs/DVDs)
		All in-store or point-of-sales marketing, including packaging
		All additional forms of marketing (cinema, outdoor, sponsorship, product placement in movies, TV shows, online games and apps, etc.)
2	Does the company's responsible marketing policy include the following public commitment related to the representation of products? (Tick all that apply) i. **ICC Framework for Responsible Food and Beverage Marketing Communications 2012 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://cdn.iccwbo.org/content/uploads/sites/3/2012/09/Framework-for-Responsible-Food-and-Beverage-Marketing-Communications-2012.pdf	Commits to presenting products in the appropriate portion size and context (and not to condone or encourage excess consumption) (Article 1 of ICC**)
		All nutritional and health-benefit information and claims for food and beverage products should have a sound scientific basis (Article 6 of ICC**). And where claims or terminology used in marketing communications might reasonably be interpreted by a consumer as health or nutrition claims, they should be supportable with appropriate scientific evidence (Article 3 of ICC**)
		Commits 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**)
		Commits not to represent food products not intended to be substitutes for meals as such (Article 5 of ICC**)
		Commits not to use consumer taste or preference tests in a way that might imply statistical validity if there is none. Testimonials are based on well-accepted and recognized opinion from experts (Article 6 of ICC**)
		Commits not to undermine the concept of healthy balanced diets, or the

		importance of a healthy active lifestyle (Article 17 of ICC**)
		All of the above
3 (New)	For transparency in its marketing activities, does the company commit: (Tick all that apply)	To clearly display the company or brand name when advertising on virtual media
	i. Background 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."	To clearly differentiate, by labeling, advertising and content on virtual media; and ensure that the true commercial purpose of marketing communications is transparent and recognizable as an advertisement, including so-called 'native advertising' (Art. 7, ICC Advertising and Marketing Communications Code 2018)
	Disclosure	
4	Does the company publicly disclose: (Tick all that apply)	Its policy (or pledge to support the ICC Code 2018) in full detail
		Its commitment to clearly differentiating marketing and branding

D2 - Marketing policy: Specific arrangements regarding responsible marketing to children and teens

	Commitment	
	Responsible marketing policy for children and teens	
1	The company has a policy on marketing to children and/or supports the (India) International Food and Beverage Pledge:	Yes, supports the FBAI pledge and has its own corporate policy that goes beyond the pledge
	i. FBAI brings together nine food and beverage companies that commit either to only advertise products to children under the age of 12 years that meet FBAI CNC or not to advertise their products at all to children under the age of 12 years.	Yes, supports the FBAI pledge and/or has an equivalent company policy
	For more information, see http://www.pledge-india.in/index.html	No, but a policy is under development
		No policy/pledge support
		No information
2	What kind of products does the company advertise to children?	No products
		Only products meeting WHO SEARO regional standards
2.1	i.**For this indicator, industry association related standards (e.g. IFBA, FBAI CNC) are considered equivalent to the company's own standards. The WHO SEARO criteria for marketing to children are defined in the World Health Organization's Nutrient Profile Model for South-East Asia Region. For more information, see https://apps.who.int/iris/handle/10665/253459	Only products meeting the company's own standards** for marketing to children
		No product restriction or all products
		No information
2.2	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
	Marketing techniques and materials aimed at children and teens	
3	Does the company commit to using responsible marketing techniques in marketing aimed at children and teens (Article 18 of ICC Framework for Responsible Food and Beverage Marketing Communications 2012), by: (Tick all that apply)	Supporting the role of parents or others responsible for guiding diet and lifestyle choices or not undermining the role of parents or other responsible for guiding diet and lifestyle choices
		

	<p>i. ICC Framework for Responsible Food and Beverage Marketing Communications 2012 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.</p> <p>For more information, see: https://cms.iccwbo.org/content/uploads/sites/3/2018/09/icc-advertising-and-marketing-communications-code-int.pdf and https://cdn.iccwbo.org/content/uploads/sites/3/2012/09/Framework-for-Responsible-Food-and-Beverage-Marketing-Communications-2012.pdf</p>	<p>Not to create a sense of urgency</p> <p>Not to use inappropriate price minimization</p> <p>Not to exploit a child's imagination in a way that could mislead him/her about the nutritional benefits of the product involved</p> <p>Ensuring that marketing materials contain an educative message in relation to healthy diets and lifestyles (industry best practice)</p> <p>Not to brand merchandise aimed at children except related to healthy products (industry best practice)</p> <p>The company commits not to market at all or applies the WHO SEARO model when marketing to children under 18</p>
<p>4</p> <p>♥</p>	<p>Does the company commit to use celebrities (including influencers) or fantasy and animated characters responsibly or not at all? (Tick all that apply)</p> <p>i. For this indicator, the last two answer options are mutually exclusive, and, therefore, only one may be selected.</p>	<p>Commits not to sponsor materials, people or activities popular with children (other than sports activities) except in conjunction with healthy products</p> <p>Pledges not to use celebrities and other people with strong appeal to children in marketing of products other than those that meet the company's healthy standard</p> <p>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</p> <p>Pledges not to use third-party or own fantasy and animation characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, in all forms of marketing.</p> <p>Pledges not to use third-party or own fantasy and animation characters with a strong appeal to children in marketing of products other than those that meet the company's healthy standard, with an exception for point of sale and packaging</p>
<p>5</p> <p>♥</p>	<p>Regarding responsible use of promotional toys, games, vouchers and competitions; does the company commit to:</p> <p>i.**For this indicator, industry association related standards (e.g. IFBA, FBAI CNC) are considered equivalent to the company's own standards.</p>	<p>Never make use of promotional games, toys, vouchers, competitions etc. in its marketing to children</p> <p>Using promotional games, toys, vouchers, competitions etc. only in accordance to WHO SEARO model</p> <p>Using promotional games, toys, vouchers, competitions etc. only in accordance to the company's own standards** for marketing to children</p> <p>No commitment</p> <p>No information</p>
6	Marketing arrangements in relation to age thresholds	

6.1 ♡	What percentage audience threshold does the company use to restrict its advertising on measured media to avoid inappropriately reaching younger age groups? i. Measured media is where audience is audited, which is usually TV. In case that different thresholds are used for different age ranges, the least strict threshold will be scored (representing the lowest score).	<25%
		26–35%
		>36%
		>50%
		No audience threshold
		No information
6.2 ♡	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
		No information
7 (NEW)	Digital marketing arrangements related to age thresholds	
7.1 ♡	Does the company utilize tools to ensure that its digital marketing does not reach younger age groups? (Tick all that apply)	Ensuring design of websites/pages is appropriate to over-12s predominantly, i.e. not designed to attract younger children
		Age screening prior to logging on/registering (e.g. enter DOB or require parent to consent)
		Review of traffic data to determine demographic visiting sites
		Ensuring adverts are designed deliberately not to appeal to children younger than 12
		Nature of third-party websites chosen to advertise on (i.e. ages targeted).
7.2 ♡	To which form and digital medium does the company apply the tools listed above?	All forms (including 'native advertising') and digital media, including own and third-party digital media
		Only own digital media or limited in another way
		No separate consideration of how to address 'child audience' for these media
		No information
	Marketing in or around schools and other educational centers, facilities and premises aimed at children and teens	
8 ♡	To what extent does the company commit to a responsible marketing approach near and in primary/elementary schools (for children up to age 11)? (Tick all that apply)	No marketing or advertising in or near PRIMARY schools
		No marketing or advertising in primary schools
		Only marketing/advertising 'healthy' products in (or near) PRIMARY schools in agreement with schools/parents
		The company does not commit to this
		No information
9 ♡	To what extent does the company commit to a responsible marketing approach near and in SECONDARY schools (for teens)? (Tick all that apply)	No marketing or advertising in or near SECONDARY schools
		No marketing or advertising in SECONDARY schools
		Only marketing/advertising 'healthy' products in (or near) SECONDARY schools in agreement with schools/parents

		The company does not commit to this
		No information
	Disclosure	
10	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
		Yes, policy or Pledge published in summary only
		No

D3 Auditing and compliance with policy

	Performance	
	Auditing and compliance with policy: all consumers	
1	Does the company audit its compliance with its policy in India, including on marketing to children?	Yes, covering all audiences, including children and/or teens
		Yes, but only for children and teens
		No audit
		No information
2	Assessment of compliance	
2.1	How is compliance assessed regarding children and/or teens?	The company appoints an independent external auditor to assess compliance with its policy or takes part in an auditing process of an external body (not industry association) it is a member of undertaken by independent company
		By an industry association
		The company conducts its own audits
		No audit
		No information
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 lower standards
		No
		No information
3	How often is the audit undertaken?	Annually, covering all audiences
		Annually, covering children and/or teens only; and less frequently or not covering other audiences
		Less frequently than annually, for any audience covered by the audit
		No
		No information
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 all media, but with no specific reference to the forms of marketing used
		The company audits compliance across limited selection of media/scope is unclear but there is clear evidence of auditing
		No audit
		No information

5	What is the company's individual compliance level for TV and digital marketing? (%) i Individual compliance refers to company's non-aggregated compliance level.	
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: i. Digital media refers to social networks i.e. Facebook, Twitter, blogs, YouTube, online newspapers.	Over 90% Less than 90% or no reporting No information
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
Disclosure		
7	Does the company publicly disclose: (Tick all that apply)	Information on its auditing practices covering children, teens and/or all consumers Results of assessment of compliance (audit) regarding children and/or teens Results of assessment of compliance (audit) regarding all consumers Report of individual compliance level for TV Report of individual compliance level for digital media Policy/statement on corrective measures regarding compliance issues

Category E – Supporting healthy diets and active lifestyles

Food and beverage manufacturers in India can support company staff to eat healthy diets and pursue active lifestyles by providing employee health and wellness programs. As also noted by FSSAI in its [Orange](#) and [Purple](#) guidance books, in addition to other benefits, these programs can help to facilitate a corporate culture that focuses on nutrition. Supportive working practices and the provision of appropriate facilities can ensure that companies enable breastfeeding mothers to give their infants the healthiest start to life. Companies can also help consumers to adopt healthy diets and active lifestyles by supporting education programs, especially those that target groups suffering from various forms of malnutrition.

This category assesses the extent to which companies support such efforts through three criteria:

E1 Supporting employee health and wellness programs

E2 Supporting breastfeeding mothers at work

E3 Supporting consumer-oriented healthy diet and active lifestyle programs

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

E1 Supporting employee health and wellness		
Commitment		
1 1.1	Does the company make a commitment to support employee health and wellness through a program focused on nutrition and physical activity, which includes expected outcomes? (Tick all that apply)	Yes, with a focus on nutrition, including expected outcomes
		Yes, with a focus on nutrition
	i. 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 have to be quantifiable.	Yes, with a focus on physical activity, including expected outcomes
	At maximum, only two answer options can be selected – one of the first two options, one of the remaining two options.	Yes, with a focus on physical activity
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 programs focused on nutrition, which includes expected outcomes?	Yes
		Yes, but it does not include expected outcomes
		No
	i. The programs may or may not include a focus on physical activity, but the indicator is assessed on the focus on nutrition.	No information
Performance		
Categories of company's employee health and wellness programs		
2	Which of the following elements are included in the company's program across the whole company? Provide examples for each of the relevant options. (Tick all that apply)	
	i. Examples may include: – seminars on nutrition, diets etc. – online materials and support for staff on nutrition and diet – healthy options/diet plans in cafés, restaurants at work sites – dietary information on menus – subsidized fruit/healthy snacks – no subsidies on chocolates, high sugar/fat/salt products – cooking masterclasses focused on healthy options – links to local fresh food markets or similar – personalized nutrition	Healthy diet
	i. Examples may include: – gyms on work sites – personalized exercise plans – subsidies for gym memberships off-site – lunchtime/worktime walking or exercise clubs – on-site sports teams – active participation in sports challenges – encouragement to use stairs not lifts etc. – encouragement/facilities to walk/bike to work – online resources re. healthy living/exercise	Healthy body
	i. Examples may include: – senior staff model good behavior, publicize their efforts – health-focused welcome pack for new starters – healthy-living/nutrition campaigns regularly throughout work sites – awards for staff making good progress – other: counselling sessions, work-life balance sessions etc.	Healthy behavior
Availability of the company's health and wellness program		
3 (NEW)	To whom is the company's health and wellness program available (across the whole company and all operations in India)?	The program is available to all employees
		The program is available to some employees
		There is no program
		No information

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 does own evaluations for at least one site (taking into account employee privacy and rights).
		No evaluations
		No information
Disclosure		
5	Does the company publicly disclose: (Tick all that apply)	Program for all employees
		Commitment to support health and wellness of groups across the food supply chain beyond direct employees
		Statement on coverage of health and wellness programs
		Quantitative or qualitative outcomes of impact of health and wellness programs

E2 Supporting breastfeeding mothers at work

	Commitment	
1	Does the company publicly commit to supporting breastfeeding mothers with appropriate working conditions and facilities at work?	Yes, set out in a policy
		Make a commitment, but no formal policy
		No commitment
		No information
	Performance	
2	Does the company's maternity leave policy allow women to take paid leave beyond those covered by Indian regulations? (For information only, i.e. not scored) i. The Maternity Benefit Act 2017 (Amendment) arranges leave up to 26 weeks for first-time pregnant women and 12 weeks for women with two or more children.	6 months or more for all women
		Between 3 and 6 months for all women
		Between 8 weeks and 3 months for all women
		No policy
		No information
	Company's provision of facilities to support breastfeeding mothers	
3	Does the company: (Tick all that apply) i. Other functional arrangements include other facilities at the workplace to help mothers express and/or breastfeed.	Provide private, hygienic, safe rooms for expressing breastmilk
		Provide fridges for storing expressed breastmilk
		Allow breastfeeding mothers breaks to express breastmilk
		Offer flexible working arrangements to support breastfeeding mothers
		Other functional arrangements that support breastfeeding mothers
	Disclosure	
4	Does the company publicly disclose: (Tick all that apply)	Policy/commitment on supporting breastfeeding mothers
		Commentary on its maternal-leave policy
		A commentary about how it supports breastfeeding mothers within the workplace

E3 Supporting consumer-oriented healthy eating and active lifestyle programs

	Commitment	
	Programs aimed at supporting consumers' healthy lifestyles	
1	For nutrition literacy and education, healthy diet-oriented and active-lifestyle programs:	
1.1	Does the company: i. 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 ¹⁶)	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	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
	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 exclusively developed and implemented by independent groups with relevant expertise
		Its own programs in addition to some developed and implemented by independent groups
		Only its own programs
		No relevant information
3	For nutrition-education / nutrition-literacy / healthy diet-oriented / active-lifestyle programs that have been independently implemented to reach groups that experience or are at high risk of malnutrition, does the company offer/sponsor/fund programs that are adapted to the specific needs, background and level of nutrition literacy of these groups?	Yes, company supported adapted programs
		No
		No information
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
5	Disclosure	
	The company publicly disclose: (Tick all that apply)	Commitment on branding and evidence-based approach

¹⁶ Gibbs, H., Ellerbeck, E., Gajewski, B., Zhang, C. and Sullivan, D. (2018). The Nutrition Literacy Assessment Instrument is a Valid and Reliable Measure of Nutrition Literacy in Adults with Chronic Disease. *Journal of Nutrition Education and Behavior*, 50(3), pp.247-257.e1.

		A description of the nutrition-education / healthy-eating and active-lifestyle programs
		Commitment regarding the types of programs to be funded for groups that experience or are at high risk of malnutrition
		Information on evaluation of all programs

Category F – Product labeling and use of nutrition and health claims

One important means of promoting healthy diets and addressing malnutrition is to provide consumers with accurate, comprehensive and readily understandable information about the nutritional composition and potential health benefits of what they eat. This can promote better nutrition by helping consumers choose appropriate products to manage their weight and help to prevent or address diet-related chronic disease, and to raise awareness of products that will address micronutrient deficiencies.

This category assesses companies' approaches to product labeling and use of health and nutrition claims, particularly with respect to the consistency of their application across product portfolios in accordance with local and international standards (CODEX). This assessment is divided into two criteria:

F1 Product labeling

F2 Nutrition and health claims

This Category carries 10% of the weight of the overall score.

F1 Product labeling		
	Commitment	
	Nutritional information disclosure	
1	Does the company commit to disclose nutritional information, beyond legal requirements, on its products on the following?	Back-of-pack and front-of-pack Back-of-pack No commitment No information
	Commitment for back-of-pack labeling	
2	Does the company commit to provide back-of-pack nutrition information on the following nutrients not covered by Indian regulation? (Tick all that apply) i. The current requirements for labeling of nutrition information per 100g or 100ml or per serving of the product as per Food Safety and Standards (Packaging and Labelling) Regulation 2011 are: (i) energy value in kcal; (ii) the amounts of protein, carbohydrate (specify quantity of sugar) and fat in gram (g) or milliliter (ml); (iii) the amount of any other nutrient for which a nutrition or health claim is made. Recent policy discussions in India indicate that a new Food Safety and Standards (Labelling and Display) Regulation is in draft.	Saturated fat separate to total fat Trans fat Dietary fiber Sodium (salt)

	Assessment of portion/ serving size labeling	
3	Does the company state for products packaged as a single portion or with multiple portions or servings, a commitment to providing nutritional information on a per-serving or per-portion basis, as quantified on the label, or on a per 100g or per 100ml basis, and stating the number of portions or servings contained in the package (Article 3.4 Codex CAC/GL 2-1985)?	Yes, for both single portion and multiple portion
		Yes, for either single or multiple servings or portion
		No
		No information
	Commitment for front-of-pack labeling	
4	Does the company also commit to providing information on the front of pack? i. Interpretative format means using colors or symbols or other graphics to help consumers to understand the information.	In an interpretative format, providing an indication of how healthy the product is, rather than just numeric information
		Numeric information only, but showing % of recommended daily intake (or similar measure)
		Numeric information on levels of key nutrients, but not showing % recommended daily intake (or similar measure)
		No front-of-pack labeling used
		No information
5	For what percentage of products does the company provide nutrition information online?	For 90% or more of products
		For between 50–90% of products
		For between 10–49% of products
		For less than 10% of products
		No nutrition information published
		No information
	Disclosure	
6	Does the company publicly disclose: (Tick all that apply)	List of nutrients included on labels set out in policy
		Commitment to labeling by per serving or per portion size etc.
		Commitment to front-of-pack labeling
		Information about the percentage of products for which the company provides nutrition information online

F2 Nutrition and health claims

	Commitment	
1	Does the company state that it will place a nutrition claim on a product only when that claim complies with: (Tick all that apply)	Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997, last modified 2013
	i. As the new Food Safety and Standards (Advertising and Claims, published on 27.11.2018) Regulation is on its way to enforcement, and in principle, is aligned with Codex Alimentarius, it is assessed whether companies already comply with the newly proposed guidelines and/or align with Codex guidance.	FSSAI's Food Safety and Standards (Advertising and Claims) Regulation, 2018, coming into force on 01.07.2019
2	Does the company state that it will place a health claim on a product only if that claim complies with (tick all that apply):	Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997, last modified 2013?

	i. As the new Food Safety and Standards (Advertising and Claims, published on 27.11.2018) Regulation is on its way to enforcement, and in principle, is aligned with Codex, it is assessed whether companies already comply with the newly proposed guidelines and/or align with Codex guidance.	FSSAI's Food Safety and Standards (Advertising and Claims) Regulation, 2018, coming into force on 01.07.2019
	Nutrition and health claims	
3	Does the company commit to using nutrition or health claims on products that have been fortified ONLY when they meet Codex standards (that is, Codex Alimentarius Guidelines for Use of Nutrition and Health Claims, CAC/GL 23-1997, last modified on 2013; and General Principles for the Addition of Essential Nutrients to Foods, CAC/GL 9-1987, last revised on 2015), if relevant** (For information only, i.e. not scored)	Yes
		No
		No information
		Not applicable
	i. **This is considered relevant only for products not covered under FSSAI's Food Safety and Standards (Fortification of Foods) Regulation, 2018.	
	Disclosure	
4	Does the company disclose publicly: (Tick all that apply)	Its commitment/policy about using nutrition and health claims on products in India
		Its commitment/policy about using health or nutrition claims on fortified products (if applicable)

Category G – Influencing governments and policymakers, and stakeholder engagement

By responding to requests from policymakers and policymaking bodies, and supporting government activities and positions on nutrition policies, companies can have an impact on Indian consumers' access to nutrition. In addition, constructive engagement by companies with a wide range of other stakeholders (including international organizations, civil society and academics) can help to strengthen their strategies and policies and provide valuable feedback on their relevance and effectiveness.

This category focuses on companies' engagement with stakeholders on corporate nutrition practices and nutrition-related issues. Companies are assessed under two criteria:

G1 Engaging and influencing governments and policymakers

G2 Stakeholder engagement and partnerships

This Category carries 5% of the weight of the overall score.

G1 Engaging and influencing governments and policymakers		
	Commitment	
	Refraining from engaging and influencing policymakers against public health interest	
1	Does the company commit to engage with political parties, policymakers and policymaking bodies when requested in support of measures designed to address obesity, diet-related diseases and/or undernutrition or micronutrient deficiencies, i.e. not to engage against such measures?	Yes
		No
		No information
	Performance	

	Supporting governments to address malnutrition	
2 (NEW)	<p>Can the company provide examples of playing an active/constructive role in supporting the government's efforts to combat all forms of malnutrition? (Tick all that apply)</p> <p>i. Credit will be given to companies with evidence on voluntary efforts aligned with FSSAI's Eat Right Movement. Examples of such efforts may be making public voluntary pledges, product-reformulation targets and efforts, or any other form of evidence the company can disclose regarding this movement.</p> <p>The Integrated Child Development Services (ICDS) is one of the largest national flagship programs for the development of the maternal and childcare services. Nutrition education, supplementary nutrition program and immunization are some of the key aspects of the ICDS.</p> <p>National Programme of Mid-Day Meal in Schools (MDMS) is a flagship program of the Government of India aimed at enhancing enrolment, retention and attendance, and simultaneously improving nutritional levels among children studying in government, local body and government-aided primary and upper primary schools and the Centres run under Education Guarantee Scheme (EGS)/Alternative & Innovative Education (AIE) and National Children Labour Project (NCLP) schools of all areas across the country.</p> <p>Additionally, evidence on all other options will be credited depending on the quality of efforts/examples described by the company. These efforts need not be limited to the options mentioned for this indicator.</p>	Voluntary efforts towards FSSAI's Eat Right Movement
		Efforts on 'red-light' labeling of packaged foods with high content of fat, sugar and salt (HFSS)
		Voluntary efforts to not promote/sell HFSS food in schools (according to FSSAI guidance on ban of unhealthy food in school canteens)
		Support national/state-level initiatives like the Integrated Child Development Services (ICDS), National Mid-day Meal Scheme (MDMS), etc.
		Others
	Disclosure	
	Disclosure of aspects related to influencing	
3	Does the company publish: (Tick all that apply)	Its membership of industry associations, influencers (individuals or groups), think tanks, interest groups or other organizations that lobby on its behalf
		Its financial support for these organizations
		Any potential governance conflicts of interest (or state that none exist)
		Board seats at industry associations and on advisory bodies related to nutrition issues
		Narrative about role played in supporting government's efforts to combat all forms of malnutrition
	Publication of company engagement activities	
4	<p>Does the company disclose its public policy position on: (Tick all that apply) (For information only, i.e. not scored)</p> <p>i. A company's public policy position is the position that it takes when engaging with policymakers, as distinct from its commercial policy on these topics.</p>	Health and nutrition claims / regulatory development
		Front-of-pack labeling
		Fiscal instruments related to nutrition (e.g. sugar taxes or subsidies for fortified products)
		Marketing to children

G2 Stakeholder engagement and partnerships

	Performance	
1	Does the company provide evidence of engaging with the following stakeholders in developing its nutrition policies/program? (Tick all that apply)	International organizations (such as UN agencies) or regional institutions National bodies and institutions CSOs/NGOs Academic institutions or scientific experts Other
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? i. 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 them. That individual / entity / organization may support or oppose, hold influence in the company or outside of it, hold relevant official positions or be affected in the long term.	Comprehensive, well-structured and focused engagement on business strategy with Indian stakeholders Limited; typically, one-way communication rather than engagement, and more ad-hoc No engagement No information
3	Does the company seek specialist external experts' advice on how it should design its strategies, policies and programs? (Tick all that apply)	To prevent and address obesity and diet-related chronic disease on a strategic/ Board level To prevent and address undernutrition or micronutrient deficiencies on a strategic/Board level The company has organized its engagement into an advisory panel or expert group that meets regularly and has a broad range of expertise, including in the field of labeling, marketing, etc.
4	Stakeholder engagement and/or partnerships to combat obesity, undernutrition, micronutrient deficiencies and related diseases	
4.1	Does the company have partnerships with, or formally support, any of the following national initiatives/organizations to address malnutrition in groups at high risk? (Tick all that apply) i. For a partnership to be acknowledged in this indicator, the company is required to provide evidence of a significant investment of company resources and a long-term commitment (a year or more).	IFPRI WHO UNICEF GAIN World Food Program Zero Hunger Challenge Save the Children Micronutrient Initiative ICDS National Mid-day Meal Scheme Tata Trust Indian Food Banking Network Other relevant organizations
4.2	Can companies provide evidence on one-to-one discussions with key organizations working on malnutrition to solicit input on its commercial strategy/policy/approach? i. Key organizations could include those listed in indicator 4.1, as well as FAO, Alive & Thrive, etc. One-to-one meetings is regular dialogue, and meetings without promotional purpose. Being a member of these organizations is not sufficient.	Yes No No information
	Disclosure	
5	Does the company publicly disclose or provide a narrative about its stakeholder engagement activities, regarding: (Tick all that apply)	Its degree of engagement and examples of how input has been used to adapt

		policies/programs to inform the company's strategy/practices in India
		Using specialist 'external expert' advice in forming its nutrition strategy
		Approach to address undernutrition and micronutrient deficiencies in partnership with listed stakeholders

Appendix II: Organizations consulted

Alive & Thrive India, FHI 360
Centre for Responsible Business
Confederation of Indian Industries
Food Fortification Initiative
Food Safety and Standards Authority of India
Global Alliance for Improved Nutrition, India
National Institute of Nutrition
Netherlands Embassy, New Delhi
Oxfam India
Rabobank India
Save the Children, India
Tata Trusts
The Bill & Melinda Gates Foundation India
UNICEF India
World Business Council for Sustainable Development
World Health Organization India

Appendix III: ATNI India Review Panel and global Expert Group members

The mandate of the India Review Panel and global Expert Group is to provide input into the development of the Corporate Profile methodology and other aspects of the Index. This group consists of members with expertise in various aspects of nutrition (including health dimensions of obesity and diet-related chronic diseases, marketing, labeling, use of claims, nutrient profiling, regulatory issues, etc.)

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

India Review Panel

Dr. Rajan Sankar

Director - Nutrition, Tata Trusts

Dr. Avula Laxmaiah

Scientist 'G' & Head, Public Health, National Institute of Nutrition (NIN)

Vivek Arora

Senior Advisor, Tata Trusts

Rohini Saran

Deputy Lead – Food Fortification Resource Centre, Food Safety and Standards Authority of India (FSSAI)

Devyani Hari

Director – Programmes, Centre for Responsible Business (CRB)

Rachna Sujay

Senior Technical Advisor – Diffusion States, Alive & Thrive, India

Dr. Antaryami Dash

Advisor – Nutrition, Save the Children

Shiva Mudgil

Vice President, RaboResearch Food & Agribusiness, Rabobank India

Global Expert Group

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

Lindsay H. Allen

Director, USDA ARS Western Human Nutrition Research Center;

Research Professor, Department of Nutrition, UC Davis

Terry T-K Huang

Professor, School of Public Health, City University of New York

Mike Rayner

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

Linda Meyers

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

Boyd Swinburn

Professor, Population Nutrition and Global Health at the University of Auckland and Alfred Deakin;

Professor and Director, World Health Organization (WHO) Collaborating Centre for Obesity Prevention at Deakin University in Melbourne

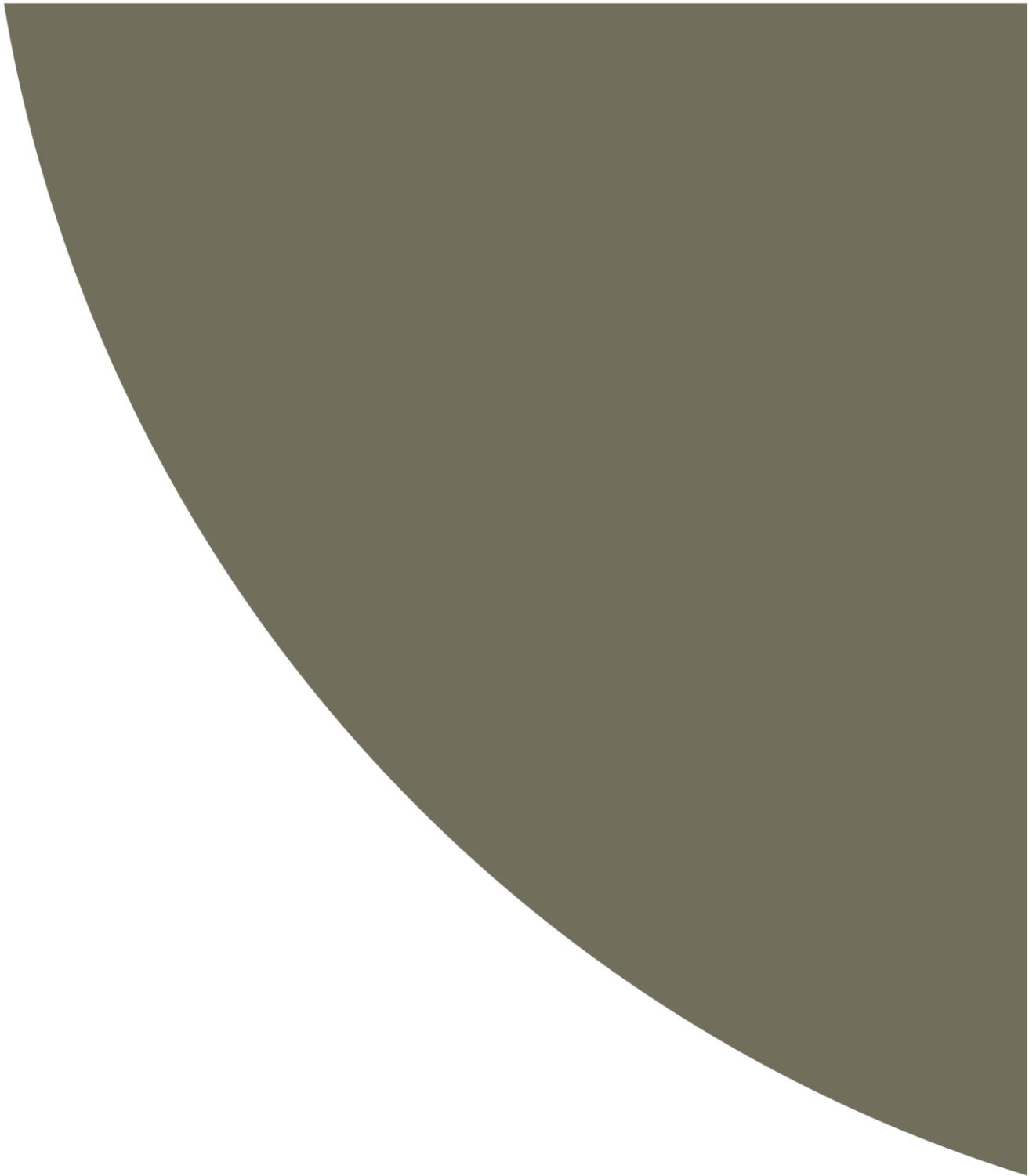
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