



Danone

France



About the company ^a	
 DANONE	
Baby food global market share (2019)	12%
Percentage of baby food revenues out of total revenues (2019)	30%
Key global baby food brands	Aptamil; SGM; Blédina; Milupa; Cow & Gate

	Weight	Score		
		2021	2018	2016
BMS/CF 1: Corporate Profile	50%	53%	60%	45%
BMS/CF 2: In-country assessment	50%	83%	33%	17%
Total	100%	68%	46%	31%
Impact on Global Index 2021 score		-0.48	-0.80	-1.04

All figures presented in the scorecard are rounded. The underlying figures are calculated using values of multiple decimal places.

BMS/CF 1: Corporate Profile

Index purpose:

The BMS/CF Marketing Index 2021 scores the constituent companies on the extent to which they market their breast-milk substitutes (BMS) and complementary foods (CF) in line with the recommendations of the 1981 Code and all subsequent relevant WHA resolutions (together known as The Code).

Research:

The Corporate Profile research was undertaken by ATNI between May and September 2020, based on documents available in the public domain or provided by the company under NDA by the beginning of June. Any documents published since are not reflected in the score. Danone engaged actively with ATNI in the research process.

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies due to, among other factors, the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Methodology:

The [BMS/CF Marketing Index 2021 methodology](#) was used to undertake this assessment, adapted from the methodology used in 2018, developed with input from ATNI stakeholders' and ATNI's BMS Expert Group. For the first time, this Index includes an assessment of whether complementary foods marketed as being suitable for infants from six to 36 months of age, are marketed in line with the guidance associated with WHA 69.9. Accordingly, the BMS/CF 1 Corporate Profile methodology includes two modules which assess companies' policies, management systems, procedures and disclosure in relation to both BMS marketing (BMS Module) and CF marketing (CF Module).

Product definitions and scope:

ATNI uses the definitions for BMS, for foods for infants and young children, and CF established by the World Health Organization (WHO). These are set out in the 1981 International Code of Marketing of Breast-milk Substitutes and in the WHO document, published in 2016, A69/7 Add 1, 13th May 2016, entitled 'Guidance on ending the inappropriate promotion of foods for infants and young children', referenced in WHA Resolution 69.9 adopted at the 69th World Health Assembly. Hereafter this document is referred to as the guidance associated with WHA 69.9.^b

^a Sources: Euromonitor International; Packaged Food, 2021 Industry Edition; Danone, [Annual Report 2019 \(2020\)](#)

^b A BMS product is one that is marketed or otherwise presented as a partial or total replacement for breastmilk, whether or not suitable for that purpose, for infants and young children from birth to 36 months of age. BMS: foods and beverages identified as being suitable for infants up to six months of age (CF 0-6), any type of milk-based infant formula (IF) or follow-on formula (FOF, also called follow-up formula) or growing-up milk (GUM, also called toddler milk). A complementary food is any food (whether manufactured or locally prepared) suitable as a complement to breastmilk or formula, when either become insufficient to satisfy the nutritional requirements of the infant.





Initial Corporate Profile score

As explained in ATNI's BMS/CF Marketing Index 2021 methodology, this Initial Corporate Profile score shown in Table 1 indicates: i) the extent to which the wording of the company's policy is fully aligned with The Code; ii) whether the management systems the company uses to implement its policy are comprehensive and consistently applied, and; iii) how extensive its disclosure is.

As Danone derives over 5% of its baby food revenues from BMS, it is assessed on the BMS Module. More than 5% of Danone's baby food sales are also attributed to CF sales which is why Danone is also assessed on

the CF Module. Sections 2-10 of the BMS module and sections 2-5 of the CF module all include analysis of policy commitments and management systems. Section 11 of the BMS Module and section 6 of the CF Module measure disclosure. The initial 2021 Corporate Profile score does not reflect which products and geographies the policy applies to, or the company's application of the policy in relation to the status of local regulation in different markets. That score is the Final Corporate Profile shown in Table 3, with appropriate weightings and penalties applied.

Table 1: Initial Corporate Profile score

Section	Article ^c	Topic	2021 score	2018 score	2016 score
Breast-milk substitute Module					
1	Introduction	Overarching commitments	94%	88%	81%
2	4	Information and education	73%	70%	42%
3	5	The general public and mothers	92%	100%	92%
4	6	Healthcare systems	68%	77%	57%
5	7	Healthcare workers	86%	83%	50%
6	8	Persons employed by manufacturers and distributors	79%	100%	75%
7	9	Labelling	78%	73%	42%
8	10	Quality	100%	100%	92%
9	11	Implementation	97%	100%	82%
10		Lobbying (policy and objectives)	94%	88%	88%
11		Disclosure	73%	76%	40%
Complementary Foods 6-36 months Module					
1		Infant and Young Child Feeding Guiding Principles	0%	-	-
2		Product formulation	58%	-	-
3		Marketing messages	0%	-	-
4		Cross promotion	0%	-	-
5		Conflict of interest	0%	-	-
6		Disclosure	0%	-	-
Initial Corporate Profile score (BMS and CF module)			81%	87%	67%

^c In addition to alignment with each article of The Code, this assessment includes consideration of any WHA resolutions that augment or relate to the article. For further detail, see the ATNI methodology for the BMS/CF Marketing Index 2021.



Corporate Profile: Analysis

Overarching commitments

Compared to the 2018 assessment, Danone has stronger overarching commitments, particularly with regards to its applicability to joint ventures and subsidiaries even where a company has a holding of less than 50%. However, Danone's policy, which was updated in 2018, continues to fall short of The Code in terms of lacking acknowledgement of WHA resolution 69.9.

Policy commitments on marketing

Danone's updated BMS marketing policy is well-aligned to the Articles of the original 1981 Code but Danone does not include explicitly commitments that reflect all WHA resolutions, including all of the recommendations relating to WHA resolution 69.9 assessed. However, in relation to WHA 58.32 and WHA 61.20, Danone scores better on the relevant indicators because ATNI re-worded them for this assessment based on input from WHO. The requirement to explicitly warn consumers that powdered formulas might contain 'pathogenic micro-organisms' was removed; WHO clarified that companies' policies instead only needed to commit to provide information that these products may cause illness if not properly prepared.

While the company displays some strong commitments in its policies, closer alignment with The Code would be achieved by:

- Incorporating the recommendations in the guidance associated with WHA 69.9, particularly recommendation 6 on conflicts of interest within the healthcare system, in company policies covering BMS marketing.
- Strengthening its commitments with regards to incentivizing marketing personnel based on BMS product sales (Article 8.1). Danone's policy explicitly states that no quotas are set for the sales of its covered products in the calculation of bonuses or incentives for its marketing personnel, but it does base the calculation of bonuses on the overall sales of the products marketed including the sales of the products that are covered by its BMS policy. Although the calculated bonus payments cannot be exclusively attributed to the sales of these covered products, Danone's policy could be strengthened by including a commitment not to include any form of sales of products covered by The Code in the calculation of bonuses.

- Developing policy commitments related to complementary foods for older infants and young children 6-36 months of age, particularly dealing with marketing, cross-promotion, and conflict of interests in healthcare systems. This is reflected in Danone's poor score on the CF module though among the companies assessed on this module, Danone scores the highest. It references some of the relevant standards relating to product formulation and commits to comply with relevant country regulations wherever its CF products are sold (Recommendation 3).

In addition to achieving full Code compliance, Danone should also strive to cover Formulas for Special Medical Purposes (FSMPs) and growing-up milks in its BMS marketing policy as these are clearly considered BMS in The Code and their marketing should therefore be accounted for. Although Danone applies its policy to infant formula in all markets (both in higher- and lower-risk countries), ATNI urges Danone to apply this policy globally in relation to all products covered by The Code.

Management systems

Danone's score on management systems is slightly lower than in 2018. Although the difference is largely due to the lack of policy commitments in relation to the guidance associated with WHA 69.9 and the marketing of CF products for which, therefore, no management systems are in place.

Danone provided stronger evidence than in 2018 in relation to clear instructions and guidance to relevant personnel on marketing to health workers (Article 7, augmented by recommendation 6 of the guidance associated with WHA 69.9) as well as having clearer and more comprehensive directives and procedures on product labelling (Article 9, augmented by recommendation 4 of the guidance associated with WHA 69.9).

The evidence provided of Danone's management systems was less comprehensive in the following respects:

- Danone's directives and guidance material did not fully cover all of The Code's recommendations (because all such recommendations are not covered by Danone's policy)
- Country-level materials (including staff instructions and procedural manuals) lacked consistency. Each should include the same comprehensive set of points to fully articulate how the policy is applied in each jurisdiction.



- Though Danone has strong policy commitments with regards to implementation and monitoring (Article 11), its related management systems are weaker as there are no clear guidelines on the process for taking corrective action whenever a non-compliance incident is confirmed.
- The quality and accuracy of the internal reporting systems are not independently verified.

Policy commitments on lobbying

Danone displayed strong transparency regarding its lobbying activities and policies in 2018 and has further improved in the current assessment. It now formally sets out its lobbying and engagement objectives. To score full marks on this section, Danone would need to explicitly commit not to undermine, and not just to support, public policy frameworks, the work of the WHO or similar agencies or national governments' efforts to develop and fully implement The Code.

(For a more comprehensive analysis of the company's policies, management systems and disclosure relating to lobbying undertaken after research for the Index, see ATNI's report Spotlight on Lobbying, published in June 2021).

Disclosure

Danone's score is lower in this section in part because it does not disclose commitments relating to WHA resolution 69.9 and marketing CF, but also because it does not publish responses to third-party reports of alleged non-compliance incidences with The Code. Danone also does not yet disclose an extensive description of its lobbying activities. On the plus side, compared to 2018, Danone now publicly discloses each complaint made by stakeholders and how it was addressed.



Final Corporate Profile score

The table below shows to which products the company's policy apply, in which geographies, and its stance in relation to local regulations. This information is used to calculate the final Corporate Profile score, as shown in Table 3.

Table 2: Application of company policy

Product type	Product made	Policy scope	Geographic coverage of policy	Stance on application of policy in relation to local regulations
Infant formula: 0-6 months	✓	✓	All markets	Danone follows national regulations where they are stricter than its policy, in addition to its own policy. If national regulations are absent or weaker than its own policy, Danone applies its own policy for infant formula in all markets (both in higher- and lower- risk countries) and follows its own policy in higher-risk countries with respect to all other BMS products covered by its policy.
Complementary foods: 0-6 months	✓	✓	Higher-risk countries	
Follow-on formula: 6-12 months	✓	✓	Higher-risk countries ^d	
Growing-up milks: 12-36 months	✓	✗	Out of scope	-
Complementary foods: 6-36 months	✓	✗	Out of scope	-

How the Final Corporate Profile score is calculated

Weighted scores: The initial Corporate Profile score is adjusted according to: i) which types of countries the policy applies to (the score is reduced by 25% if the company applies the policy only in higher-risk countries for a particular product type); ii) the company's stance in relation to local regulation in countries where regulations are weaker than its policy, or absent. If it does not uphold its own policy in full, the score is reduced by a further 15%.

The scores for each product type in Table 3 show the level of compliance each company achieves for that product type. If the company does not apply its policy to any product category it scores zero for that category. This is also the case if the company does not disclose how it applies its policy to a particular product type. If a company does not make a type of product, N/A is shown in Table 3.

Final Corporate Profile score: This is the final score weighted as described above and applying the weightings for each module of the methodology. The BMS modules carries 95% of the weight and the CF module carries 5% of the weight. That final score is arrived at by applying all relevant penalties and weightings. (IF score * IF weighting * 0.95) + (CF 0-6 score * CF weighting * 0.95) + (FOF score * FOF weighting * 0.95) + (GUM score * GUM weighting * 0.95) + (CF 6-36 score * CF weighting * 0.05). If a company derives less than 5% of its baby food revenues from CF, the CF module is not applied and it is not scored for that product type. The BMS module then contributes 100% to the company's score.

^d Higher-risk country: When a country meets either of the following criteria: a) more than 10 per 1000 under 5 mortality rate, b) more than 2% acute malnutrition (moderate and severe wasting) in children under five. ATNI uses the same definition for these countries as FTSE4Good.



Table 3: Calculation of the Final Corporate Profile score, with product type and module weightings applied

Product type weighting		BMS				CF
		IF 0-6	CF 0-6	FOF 6-12	GUM 12-36	CF 6-36
Step 1	Does the policy apply to this product type?	Yes	Yes	Yes	No	No
Initial Corporate Profile score (Table 1)		81%				
Product type weighting of Initial Corporate Profile score (95% BMS Module; 5% CF Module)		35% of 95%	25% of 95%	20% of 95%	20% of 95%	5%
Step 2	Initial score for each product type with product type weighting applied	27%	19%	15%	15%	4%
Step 3	Score after product weight applied based on policy coverage	27%	19%	15%	0%	0%
Step 4	Score after geographic penalty applied if any (x 25%)	27%	14%	12%	0%	0%
Step 5	Score with regulatory penalty applied if any (x additional 15%)	27%	14%	12%	0%	0%
Step 6	Final score by product type	27%	14%	12%	0%	0%
Final Corporate Profile score (sum of product type final scores)		53%				
Adjustment to Global Index 2021 score (out of -0.75)		-0.35				

Box 1: Analysis of compliance excluding findings related to the guidance associated with WHA 69.9 to provide like-for-like analysis with 2018 Corporate Profile score

The purpose of this section is to provide a like-for-like comparison between the company's 2018 and 2021 results to illustrate the impact of the inclusion of the guidance associated with WHA 69.9 and assessment of CF marketing on changed scores versus the impact of other factors on the 2021 scores such as changes to a company's policies, practices and disclosure. It is provided purely for comparison purposes. This score is not used by ATNI. It is important to note that this score does not provide an indication of the company's compliance with The Code as it should now be interpreted.

Danone's Corporate Profile score presented below is based solely on the BMS Module (100% weighting) with the indicators related to the guidance associated with WHA 69.9 excluded, for the purpose of the comparison.

2018 final BMS 1 score excluding WHA Resolution 69.9	2021 final BMS /CF 1 score excluding WHA Resolution 69.9	2021 final BMS/CF 1 score including WHA Resolution 69.9
60%	62%	53%

Danone's final 2021 Corporate Profile score would have been 9% higher if ATNI had not incorporated changes in relation to the guidance associated with WHA 69.9 within the BMS module assessment and added the CF module assessment, which indicates that the change in the score is primarily attributed to the lack of commitments to implement the guidance associated with WHA 69.9 recommendations.

However, in a like-for-like comparison between the 2018 and 2021 final Corporate Profile results there is a 2% difference as Danone has evidenced stronger management systems in the 2021 assessment and has improved commitments in relation lobbying on BMS-related issues.



BMS/CF 2: In-country assessments

Market share and legitimate BMS/CF brands available in each market^e

Country	Market share ^f	BMS /CF brands sold
Philippines	<5%	Aptamil
Mexico	<5%	Aptamil, Neocate, Nutricia: Infatrini, Fortini, KetoCal

Findings

Table 4 sets out a summary of key findings in the Philippines and Mexico. Additional detail is available in ATNI's Summary Reports for each country and in Westat's reports. It is important to note that in each market ATNI assesses companies' compliance with The Code and any local regulations that go beyond The Code. ATNI does not assess companies' compliance with local regulations that are in line with or less stringent than The Code.

Table 4: Summary of key findings in the Philippines and Mexico

	Philippines	Mexico	Total
Total number of legitimate BMS/CF products found in the market	6	14	20
Infant formula	4	9	13
Complementary foods < 6 months	0	0	0
Follow-on formula	2	1	3
Growing-up milks	0	4	4
Complementary foods 6-36 months	0	0	0
Total observed incidences of non-compliance identified	0	3	3
Infant formula	0	1	1
Complementary foods < 6 months	0	0	0
Follow-on formula	0	1	1
Growing-up milks	0	1	1
Complementary foods 6-36 months	0	0	0
Non-specified products*	0	0	0
Ratio of incidences of observed non-compliance to products assessed	0.00	0.21	
Level of compliance	Complete	High	
Aggregate score (Philippines and Mexico)	100%	66%	83%
Adjustment to Global Index 2021 score (out of -0.75)		-0.13	

Key to level of compliance

Complete:

No incidence of non-compliance found.

High:

Fewer than or equal to 1 incidence of non-compliance by number of products found in the market.

Medium:

Between 1.1 and 2 incidences of non-compliance by number of products found in the market.

Low:

More than 2.1 incidences of non-compliance by number of products found in the market. number of products assessed

*Non-specified products do not relate to a specific product but rather relate to company or brand marketing attributed to its BMS/CF products.

^e Other brands may be available for sale in the market – as ATNI found – but these are parallel (unofficial) products, which ATNI does not include in the assessments or scores.

^f Source: Euromonitor International; Packaged Food, 2021 Industry Edition



In-country assessments: Analysis

Article 4: Information and education material, including donations of equipment

- No information, educational material or equipment was found in the Philippines or in Mexico demonstrating good compliance with this article of The Code. (Compliance with Article 4.2 was only assessed in Mexico at the physical retail outlets visited as no data collection could be conducted in healthcare facilities due to COVID-19 restrictions).

Article 5: Advertising and promotions to the general public and mothers

- No contraventions of The Code were found related to advertising and promotions to the public, mothers and/or caregivers in the Philippines.
- In Mexico, there was one finding of a growing-up milk advertised on the company's website in contravention to Article 5.1 of The Code.
- None of the caregivers interviewed in the Philippines reported receiving free gifts or being encouraged to use Danone's BMS products by retail personnel or company representatives, demonstrating good compliance with this article of The Code.

Article 6: Marketing within the healthcare systems (Philippines only)

- No marketing was observed in healthcare systems in the Philippines. Moreover, none of the caregivers interviewed reported healthcare workers promoting Danone products in healthcare facilities, demonstrating good overall compliance with this article of The Code.
- Due to COVID-19, no healthcare facilities were visited in Mexico to undertake this type of assessment.

Article 7: Marketing to healthcare workers (Philippines only)

- In the Philippines, none of the interviewed health professionals reported of financial or material inducements or offers of product samples by company representatives, demonstrating good overall compliance with this article of The Code.
- Due to COVID-19, no healthcare facilities were visited in Mexico to undertake this type of assessment.

Article 9: Labelling

- No non-compliant labels were found on Danone's products assessed in the Philippines demonstrating good compliance with this article of The Code and associated national regulations that go beyond The Code.
- In Mexico, two products, one infant formula and one follow-on formula, had non-compliant labels, as they conveyed an endorsement by professionals which is a non-compliance with Recommendation 4 of the guidance associated with WHA 69.9 that stipulates which messages should and should not be used, including on package labels^g.

^g Although Danone informed ATNI that the endorsement statement had been removed from its products in Mexico, it is still counted here as it was found during the course of the study.



In-Country Assessment

Research:

The research was undertaken by Westat, a U.S.-based health and social science research company, under contract to ATNI, working with a local partner in each country.

Methodology:

The methodology is based on the second edition of the NetCode toolkit published in 2017, Monitoring the Marketing of Breast-milk Substitutes: Protocol for Periodic Assessments. Full details of the methodology are available in the Westat reports for each country.

Data collection methods included:

- Interviews with pregnant women and mothers of infants in healthcare facilities (only in the Philippines).
- Interviews with healthcare workers in healthcare facilities (only in the Philippines).
- Identification of promotional, informational and educational materials produced by BMS/CF manufacturers in healthcare facilities (only in the Philippines) and retail stores.
- Identification of marketing and point-of-sale promotions by BMS/CF manufacturers in retail stores and on online retail sites.
- Analysis of product labels and inserts of all available BMS/CF products on the local market.
- Media monitoring, including various forms of traditional and digital media.

Definitions used:

Westat's studies included the following types of products, following the definitions used in The Code and the guidance associated with WHA Resolution 69.9:

- BMS products include: Infant formula (for infants less than six months of age); follow-on formula – sometimes called follow-up formula – (for infants 6-12 months of age); growing-up milk (for children 12-36 months of age); CF when recommended for infants less than six months of age.
- CF marketed as suitable for young children from 6-36 months of age.

Definitions of non-compliance with The Code: 2017 NetCode Protocol, WHO and other authoritative sources (such as the Helen Keller Institute) and local regulations in each country. Full list of definitions available as an Annex to the Westat reports.

Location:

National Capital Region, Philippines and Mexico City, Mexico.

Sampling and scope:

- **Healthcare facilities:** Selected with probability proportionate to size from a sample frame of eligible facilities.
- **Mothers and caregivers and healthcare workers:** Selected on a probability basis within each healthcare facility.

- **Retailers:** One small retailer or pharmacy in proximity to each healthcare facility is selected on a purposive basis as well as the 10 largest retail stores that sell a high volume and variety of the products within the study scope are identified in each country and visited. Additionally, the five major online retailers in each country were identified with the advice of the local partners. Given that the study in Mexico excluded healthcare facility assessments, small retailers and pharmacies were not visited.
- **Advertising:** Various traditional media were monitored, such as television, print and radio by a specialist agency in each country. Additional monitoring of online media was undertaken by local partners.
- 330 women and 126 healthcare workers were interviewed in the Philippines, and none in Mexico due to Covid-19 restrictions.
- **Products:** BMS and CF products were first identified through searches on online retailers and visits to 'brick and mortar' retailers. As many products as possible were purchased. The 2017 NetCode protocol required the purchase of a single item of every relevant product included in the study; for products sold in different sizes, those of a medium-size or the most commonly purchased size available are chosen in an effort to maximize the amount of information included on the label. Not all products shown on online retail sites were in fact available for sale.

Fact-checking with companies:

Once data collection in healthcare facilities and retailers had been completed, ATNI undertook various fact-checks with the companies assessed in the BMS/CF Marketing Index 2021 (but not with the 'other' companies whose products were also found). ATNI confirmed which of the companies' products identified, through a wide-ranging search of online sites and physical stores, were in fact legitimate products. This was to exclude parallel imports, for which the companies were not responsible, from the assessment. The companies were also asked to confirm with which online retailers they had formal commercial contracts. Point-of-sale promotions on online retail websites were only included where the companies confirmed such commercial relationships. If companies did not respond to ATNI's request, observations made on these online retailers were included in the assessment. In an innovation to the research process for this Index, companies were also provided with evidence of all observed incidences of non-compliance, in the form of photographs or screenshots, during the final fact-checking step.

Scoring:

For an explanation of how the scores were calculated, see the [ATNI BMS/CF Marketing Index methodology](#).



Box 2: In-country assessment | Analysis of compliance excluding findings related to the guidance associated with WHA 69.9 to provide like-for-like analysis with 2018 in-country assessment and final combined score

The table below sets out Danone's results if the findings related to the guidance associated with WHA 69.9 are excluded from the BMS/CF 2 results. This provides a direct like-for-like comparison of the findings in 2018 and in this iteration of the Index. It is important to note that these are not the results that provide the complete picture of Code compliance. They are provided for information only. They are not the basis of any scores or analysis presented elsewhere in any of the associated reports.

	Total number of BMS products (i.e. excluding CF)	Relative level of compliance excluding WHA 69.9 results	Total number of incidences of non-compliance excluding WHA 69.9 results
The Philippines	6	0.00 (Complete)	0
Mexico	14	0.10 (High)	1

Danone's level of compliance in 2021 excluding the results related to the guidance associated with WHA 69.9 does not change for BMS/CF 2 in both countries. In the Philippines, no incidences of non-compliance were found overall, whereas in Mexico the two product label findings which were found to be non-compliant with Recommendation 4 of the guidance associated with WHA 69.9, conveying an endorsement by professionals, would be excluded resulting in one incidence of non-compliance and a high level of compliance. In a like-for-like comparison with the 2018 BMS 2 results, Danone's overall level of compliance improves by 50%.

Accordingly, in a like-for-like comparison, the final combined score for Danone of the BMS/CF 1 and BMS/CF 2 assessments excluding findings related to the guidance associated with WHA 69.9 would be 73%, 5% higher than its 2021 final score.

Adjustment to Global Index score:

For those companies included in the Global Access to Nutrition Index 2021, the total possible adjustment made based on the Corporate Profile (CP) or BMS/CF 1 score is -0.75, 50% of the maximum possible adjustment of -1.5. The other -0.75 maximum adjustment is determined by the company's score on BMS/CF 2. The final combined score represents the level of compliance with the ATNI methodology; the adjustment is based on the level of non-compliance. Therefore, the calculation for the adjustment is:
-1.5 x (100% - final combined score)



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Westat and the Nutrition Center of the Philippines (NCP), its local subcontractor, were responsible for the collection of data related to company compliance with the International Code of Marketing of Breast-milk Substitutes, all subsequent, relevant WHA resolutions, and any additional country-specific regulations related to marketing of these products in the Philippines. Similarly, Westat and Universidad Iberoamericana (IBERO) in collaboration with the Instituto Nacional de Salud Pública (INSP), IBERO/INSP being Westat's local subcontractor, were responsible for the same scope of data collection in Mexico. In the Philippines, Westat and NCP engaged with health facilities, mothers of infants who attended those facilities, health professionals at the facilities, and retailers as part of the data collection and analysis process. In Mexico, Westat and IBERO/INSP engaged with retailers as part of the data collection and analysis process. Westat is

responsible for the analysis of the data related to compliance with ATNI's methodology on which the Access to Nutrition Foundation (ATNF) will (in part) base the scoring of baby food companies in the ATNI BMS/CF Marketing Index 2021, which will in turn inform the companies' scores in the ATNI Global Index 2021.

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