



# FrieslandCampina

The Netherlands



## About the company<sup>a</sup>



Baby food global market share (2019) 2%

Percentage of baby food revenues out of total revenues (2019) 11%

Key global baby food brands Friso

	Weight	Score		
		2021	2018	2016
<b>BMS/CF 1: Corporate Profile</b>	50%	42%	51%	31%
<b>BMS/CF 2: In-country assessment</b>	50%	0%	0%	17%
<b>Total</b>	100%	21%	25%	24%
<b>Impact on Global Index 2021 score</b>		-1.18	-1.1	-1.14

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. FrieslandCampina 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, 13<sup>th</sup> 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 69<sup>th</sup> World Health Assembly. Hereafter this document is referred to as the guidance associated with WHA 69.9.<sup>b</sup>

<sup>a</sup> Sources: Euromonitor International; Packaged Food, 2021 Industry Edition; FrieslandCampina, [Annual Report 2019: Brands Growth and Sustainable Impact](#) (2020)

<sup>b</sup> 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 include: 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 FrieslandCampina derives more than 5% of its baby food revenues from BMS, it is assessed on the BMS

Module. Sections 2-10 of the BMS module all include analysis of policy commitments and management systems. Section 11 of the BMS Module measures 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 <sup>c</sup>	Topic	2021 score	2018 score	2016 score
<b>Breast-milk substitute Module</b>					
1	Introduction	<b>Overarching commitments</b>	<b>92%</b>	100%	69%
2	4	<b>Information and education</b>	<b>73%</b>	67%	75%
3	5	<b>The general public and mothers</b>	<b>100%</b>	83%	90%
4	6	<b>Healthcare systems</b>	<b>89%</b>	80%	97%
5	7	<b>Healthcare workers</b>	<b>66%</b>	83%	100%
6	8	<b>Persons employed by manufacturers &amp; distributors</b>	<b>83%</b>	83%	100%
7	9	<b>Labelling</b>	<b>72%</b>	90%	86%
8	10	<b>Quality</b>	<b>100%</b>	100%	100%
9	11	<b>Implementation</b>	<b>96%</b>	93%	69%
10		<b>Lobbying (policy and objectives)</b>	<b>13%</b>	13%	0%
11		<b>Disclosure</b>	<b>48%</b>	26%	13%
<b>Initial Corporate Profile score (BMS module only)</b>			<b>76%</b>	74%	72%

<sup>c</sup> In addition to alignment with each article of the 1981 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

FrieslandCampina has not changed its BMS marketing policy or related standards since 2017 however the company has informed ATNI of being in the process of revising its existing policy. As stated in that policy, the company supports exclusive breastfeeding for the first six months, continued breastfeeding up to two years and beyond, and the introduction of appropriate complementary foods from the age of six months. While it explicitly acknowledges the importance of The Code and subsequent WHA resolutions, that policy does not reference or state support for the recommendations made in the guidance associated with WHA 69.9. The company's score has therefore fallen in this section since the 2018 assessment, due to the amendment ATNI made to indicators to include reference to the guidance associated with WHA 69.9.

### Policy commitments on marketing

FrieslandCampina's 2017 policy commitments are closely aligned with The Code. However, they do not fully incorporate the recommendations in the guidance associated with WHA 69.9 which strengthen and/or clarify the scope and recommendations of the original 1981 Code and the subsequent relevant resolutions. With respect to the assessment of commitments in relation to WHA 58.32 and WHA 61.20 recommendations, FrieslandCampina's score increased in relation to 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. With respect to the guidance associated with WHA 69.9, it was the only company whose policy stipulates the wording required by Recommendation 4 on the labels and inserts of follow-on formula.

FrieslandCampina's BMS marketing policy, standards and associated guidelines are applied in all markets, i.e. in higher-risk and lower-risk markets, but only to the product types defined in local legislation (which all companies are required to comply with). The company applies its policy and standards in relation to infant formula, follow-on formula and formulas for special medical purposes only in the few markets where there are no regulations in place. However, if regulations in a market cover fewer product types than FrieslandCampina's policy, or omit provisions covered by its own policy, the company follows these regulations rather than upholding its own policy. If local

regulations are less detailed on any particular topic than its own policy, then the company follows its own guidelines.

However, despite the good alignment of the company's commitments to the Code, it could improve the policy in the following areas to increase its score:

- Make the full commitment to not provide to health workers any samples of infant formula or other products within the scope of The Code, except for the purpose of professional evaluation or research (Article 7.4) and irrespective of allowances within local regulation. Similarly, commit not to provide any equipment or utensils for the preparation or use of formulas. The company has confirmed to ATNI its intention to revise its standards and guidelines in this way.
- Given that the wording of FrieslandCampina's policy is well-aligned to that of The Code, in terms of the provisions covered, the company is urged to revise its policy in three ways. First, to apply it in full where local regulations are less stringent in respect of either product scope or Code provisions. (Associated standards and guidelines should also be applied in the same way). Second, extend the scope of products covered to growing-up milks. Third, extend the policy's scope to all markets.

### Management systems

Compared to the 2018 assessment, FrieslandCampina has improved its performance on management systems. The company provided ATNI with more evidence during the engagement process of the comprehensive procedures it has in place to ensure the proper implementation of the commitments set out in its BMS marketing policy and guidelines. Overall, the company has improved procedures with regards to marketing within the healthcare system (Article 6) and in terms of ensuring the implementation of its policy among other key parties including both retailers and distributors and having more frequent company audits on an annual basis (Article 11). However, as well as gaps due to the lack of commitments and therefore associated directives relating to the guidance associated with WHA 69.9, FrieslandCampina's performance fell in relation to how it responds to incidences of non-compliance (Article 11). Its guidelines in this area, including those for employees and all relevant third parties on potential corrective actions that can be taken, are not complete. Also, although the company has the strongest commitments among the companies assessed relating to its system of incentives



and calculation of bonuses (Article 8.1), it did not provide evidence of procedures to implement them.

### **Policy commitments on lobbying**

FrieslandCampina's score in relation to its policy on lobbying on BMS-related issues remained low, with an unchanged score from the 2018 assessment.

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

### **Disclosure**

FrieslandCampina improves with regards to its transparency by fully disclosing membership of trade associations/industry groups, and providing a full certified list that is made publicly available. The company can further increase its score in this area by making information on external audits and its response to third-party reports of non-compliance publicly available, as well as by publishing a comprehensive description of its lobbying activities in relation to BMS marketing.



## 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	Where there are no local regulations, it follows its own policy. In countries where regulation is in place, and where it is less strict than the company's policy, it follows local regulation both in terms of the products the legal measures cover (which is what this symbol (✓) refers to) and the provisions of the regulation in relation to different forms of marketing. (The exception is where local regulation has the same provision as in the company's policy but that provision is less detailed than the policy, in which case it applies its policy.)
Complementary foods: 0-6 months	-	-	-	
Follow-on formula: 6-12 months	✓	(✓)	All markets	
Growing-up milks: 12-36 months	✓	✗	Out of scope	
Complementary foods: 6-36 months <sup>d</sup>	✓	-	-	

### How the Final Corporate Profile score is calculated

**Weighted scores: Box 1 explains the tailored approach ATNI has developed, with input from the BMS Expert Group, to calculate FrieslandCampina's policy's final Corporate Profile score.** ATNI could not apply the standard approach to adjusting the initial Corporate Profile score because FrieslandCampina's approach to applying its policy does not fit within the pre-determined bands set out in ATNI's methodology.

The standard approach applies two penalties 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.

#### Box 1: Adjustment to penalty in the calculation of weighted scores

ATNI has gained greater insight and understanding of how the policy plays out in practice since the last assessment. FrieslandCampina's policy applies globally but in all countries other than those that have no local regulation, the company follows the local regulation in product scope and marketing covered even where they are weaker than its own policy. Therefore, in these countries FrieslandCampina applies its policy less extensively compared to the five other companies whose policies ATNI was able to assess which are upheld in full where local regulations are weaker than their policies (in higher-risk countries at the least). As FrieslandCampina's approach does not fit within any of ATNI's pre-determined penalty bands as described in the 'weighted scores' section above, ATNI has applied a penalty between the two levels of 25% and 36.25%, i.e., of 30.62% concomitant with the effect of the company's stance in the markets where it operates. This is a higher penalty than ATNI applied in 2018 and has a substantial effect on the company's final score.

<sup>d</sup> Although FrieslandCampina also manufactures complementary foods, it is not assessed on the CF module as the baby food sales of this product category is less than 5%



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	N/A	Yes	No	N/A
Initial Corporate Profile score (Table 1)		76%				
Product type weighting of Initial Corporate Profile score (100% BMS Module)		60% <sup>e</sup>	N/A	20%	20%	N/A
Step 2	Initial score for each product type with product type weighting applied	45%	N/A	15%	15%	N/A
Step 3	Score after product weight applied based on policy coverage	45%	N/A	15%	0%	N/A
Step 4 & 5	Score after tailored penalty applied (x 30.62%)	32%	N/A	11%	0%	N/A
Step 6	Final score by product type	32%	N/A	11%	0%	N/A
Final Corporate Profile score (sum of product type final scores)		42%				
Adjustment to Global Index 2021 score (out of -0.75)		-0.43				

#### Box 2: Analysis of compliance excluding findings 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.

**FrieslandCampina's Corporate Profile score presented below is based solely on the BMS Module (100% weighting) because the company does not make CF. Further, the analysis excludes the indicators related to the guidance associated with WHA 69.9 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
51%	44%	42%

FrieslandCampina's final 2021 Corporate Profile score would have been 2% 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.

However, in a like-for-like comparison between the 2018 and 2021 final Corporate Profile results there is a 7% difference which indicates that FrieslandCampina's lower score is primarily attributed to the stricter penalty applied in the 2021 assessment of 30.62%

<sup>e</sup> Given that the company derives ≥5% of its baby food revenues from BMS sales but less than this amount from CF sales, the Corporate Profile assessment and score is solely based on the BMS module. In this case, because FrieslandCampina does not manufacture CF 0-6, the 25% weighting for CF 0-6 is re-allocated to IF so that a weighting of 60% is applied to IF.



## BMS/CF 2: In-country assessments

Market share and BMS/CF brands available in each market<sup>f</sup>

Country	Market share <sup>g</sup>	BMS /CF brands sold
Philippines	The Philippines is not an official market of FrieslandCampina. The company pulled out its Friso products in October 2019.	
Mexico	<5%	Friso

### Findings

Given that FrieslandCampina does not sell its BMS products in the Philippines, the BMS/CF 2 assessment is based only on the study in Mexico. Table 4 sets out a summary of the key findings in 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
<b>Total number of legitimate BMS/CF products found in the market</b>	N/A	10	<b>10</b>
Infant formula	N/A	7	<b>7</b>
Complementary foods < 6 months	N/A	-	-
Follow-on formula	N/A	1	<b>1</b>
Growing-up milks	N/A	2	<b>2</b>
Complementary foods 6-36 months	N/A	-	-
<b>Total observed incidences of non-compliance identified</b>	N/A	26	<b>26</b>
Infant formula	N/A	4	<b>4</b>
Complementary foods < 6 months	N/A	-	-
Follow-on formula	N/A	1	<b>1</b>
Growing-up milks	N/A	21	<b>21</b>
Complementary foods 6-36 months	N/A	-	-
Non-specified products*	N/A	0	<b>0</b>
<b>Ratio of incidences of observed non-compliance to products assessed</b>	N/A	2.60	
<b>Level of compliance</b>	N/A	Low	
<b>Aggregate score (Philippines and Mexico)</b>	N/A	0%	<b>0%</b>
<b>Adjustment to Global Index 2021 score (out of 0.75)</b>		<b>-0.75</b>	

### 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

<sup>f</sup> 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.

<sup>g</sup> 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 Mexico. It was only possible to assess compliance with Article 4.2 at the physical retail outlets visited, as no data collection could be conducted in healthcare facilities due to COVID-19 restrictions in Mexico. On this basis, the company achieved good compliance with this article of The Code and associated national regulations.

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

- In Mexico, the majority of incidences of non-compliance were found on the company's online media channels including social media sites such as Twitter and Facebook. In total 12 adverts of growing-up milk were observed (Article 5.1). There were no findings on traditional media platforms.
- Point-of-sale promotions in the form of price promotions or incentivized product purchase were also observed in Mexico (Article 5.3). All findings were attributed to growing-up milks, three were observed on online retail sites and five were found at physical retail visits.

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

- Given that it was not possible to undertake on compliance with this Article in Mexico due to COVID-19 restrictions, and because the Philippines is not an official market for FrieslandCampina, no findings can be reported here.

### Article 7: Marketing to healthcare workers (Philippines only)

- Given that it was not possible to undertake on compliance with this Article in Mexico due to COVID-19 restrictions, and because the Philippines is not an official market for FrieslandCampina, no findings can be reported here.

### Article 9: Labelling

- Four out of a total of six non-compliant labels found in Mexico related to infant formula products. One was on follow-on formula and the other was for a growing-up milk. All six were missing only one of the required statements that powdered formulas should be prepared one feed at a time, as set out in the WHO/FAO guidelines on safe preparation, storage and handling of powdered infant formula referenced in WHA 61.20 and as assessed by the NetCode protocol, (but this is not a requirement of local regulations).





## 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:

- 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:

Mexico City, Mexico.

### Sampling and scope:

- **Retailers:** The 10 largest retail stores that sell a high volume and variety of the products within the study scope are identified and visited. Additionally, the five major online retailers 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.
- **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 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 3: 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 FrieslandCampina'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
<b>The Philippines</b>	No FrieslandCampina products sold in this market		
<b>Mexico</b>	10	2.60 (Low)	26

FrieslandCampina's level of compliance in 2021 excluding the results related to the guidance associated with WHA 69.9, which is solely based on the BMS/CF 2 findings in Mexico, would not change as none of the identified non-compliances related to WHA 69.9 and the company does not sell CF products. In a like-for-like comparison with the 2018 BMS 2 results, FrieslandCampina's overall level of compliance has not changed.

Accordingly, in a like-for-like comparison, the final combined score for FrieslandCampina of the BMS/CF 1 and BMS/CF 2 assessments excluding findings in relation to the guidance associated with WHA 69.9 would be 16% suggesting no difference with its 2021 final score.

**Adjustment to Global Index 2021 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:  
 $-1.5 \times (100\% - \text{final combined score})$



## Disclaimers

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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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