



KraftHeinz

U.S.



| About the company ^a | |
|---|--|
| | |
| Baby food global market share (2019) | 1% |
| Percentage of baby food revenues out of total revenues (2019) | 2% |
| Key global baby food brands | Heinz ; Plasmon; Farley's; Nipiol; Nurture |

| | Weight | Score | | |
|--|--------|-------|------|-------|
| | | 2021 | 2018 | 2016 |
| BMS/CF 1: Corporate Profile | 50% | 11% | 0% | 0% |
| BMS/CF 2: In-country assessment | 50% | 66% | 0% | 33% |
| Total | 100% | 38% | 0% | 17% |
| Impact on Global Index 2021 score | | -0.93 | -1.5 | -1.25 |

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. KraftHeinz 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 Euromonitor International; Packaged Food, 2021 Industry Edition; KraftHeinz, Form 10-K 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 KraftHeinz derives over 5% of its baby food revenue from BMS, it is assessed on the BMS Module. More than 5% of KraftHeinz's baby food sales are attributed to CF sales which is why KraftHeinz 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 | 25% | 0% | 0% |
| 2 | 4 | Information and education | 48% | 0% | 0% |
| 3 | 5 | The general public and mothers | 10% | 0% | 0% |
| 4 | 6 | Healthcare systems | 6% | 0% | 0% |
| 5 | 7 | Healthcare workers | 22% | 0% | 0% |
| 6 | 8 | Persons employed by manufacturers and distributors | 25% | 0% | 0% |
| 7 | 9 | Labelling | 25% | 0% | 0% |
| 8 | 10 | Quality | 50% | 0% | 0% |
| 9 | 11 | Implementation | 21% | 0% | 0% |
| 10 | | Lobbying (policy and objectives) | 0% | 0% | 0% |
| 11 | | Disclosure | 0% | 0% | 0% |
| Complementary Foods 6-36 months Module | | | | | |
| 1 | | Infant and Young Child Feeding Guiding Principles | 0% | - | - |
| 2 | | Product formulation | 10% | - | - |
| 3 | | Marketing messages | 0% | - | - |
| 4 | | Cross promotion | 0% | - | - |
| 5 | | Conflict of interest | 0% | - | - |
| 6 | | Disclosure | 0% | - | - |
| Initial Corporate Profile score (BMS and CF module) | | | 20% | 0% | - |

^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

For the first time, KraftHeinz shared its BMS Marketing Charter (its policy) with ATNI for this Index which meant that the company could be assessed across all sections of the methodology. In contrast to 2018, the company now discloses broad commitments in support of breastfeeding, though no explicit commitments are stated of supporting exclusive breastfeeding for the first six months, continued breastfeeding for two years and beyond, nor the introduction of appropriate complementary foods from the age of six months. Although the Charter acknowledges The Code, it falls short in acknowledging WHA 69.9 and associated guidance. It also lacks commitments in relation to joint-ventures and subsidiaries.

Policy commitments on marketing

KraftHeinz's active participation in ATNI's research process for the first time also enabled a more complete assessment to be undertaken of its policy commitments. Improvements were noted in the following areas, as reflected in the higher scores than previously, although the Charter is not well aligned with the recommendations of The Code:

- The Charter covers all areas of marketing in relation to informational and educational material intended to reach mothers and/or caregivers (Article 4)
- The Charter states an explicit commitment not to use advertising or other forms of promotion to reach the general public (Article 5.1). However, it does not cover the remaining provisions of Article 5 which address point-of-sale promotions at the retail level, contact initiated by marketing personnel and offered gifts and samples.
- KraftHeinz's Charter covers donations within the healthcare system though within the terms of Article 6.8 in which donations are allowed if they bear the company's name or logo but do not refer to its proprietary products. The guidance associated with WHA 69.9 has amended the stance; there should be no donation or distribution of ANY equipment or any services within the healthcare system (Recommendation 6) which is why the company does not score in full on the relevant indicator. The Charter does not cover any other commitments related to marketing within the healthcare system.
- Some commitments have been made with regards to marketing to health workers though they are not fully aligned with the current interpretation of The Code, i.e., incorporating the guidance associated with WHA 69.9. The commitments made relate to the provision of information to health professionals that is solely restricted to scientific and factual matters (Article 7.2), and to not providing financial or material inducements to health workers to promote products within the scope of The Code (Article 7.3 amended by the guidance associated with WHA 69.9 to completely exclude the provision of any gifts or form of incentive to health care staff).
- The policy explicitly commits to not allowing the company's employees to deliver education to pregnant women or mothers of infants and young children (Article 8.2) though it lacks commitments in relation to the system of sales incentives for its marketing personnel (Article 8.1).
- Several commitments are made with regards to product labelling, particularly in relation to infant formula in terms of information that is required and prohibited on the labels (Article 9.1; Article 9.2). The Charter also includes commitments to have the required information and messaging on the harm of inappropriate preparation of powdered formula (WHA 58.32, WHA 61.20). The company also commits to not make any health or nutrition claims on its BMS products (WHA 63.23).
- KraftHeinz's policy includes all required commitments relating to product quality (Article 10). In fact, this is the only area in which the company scores on the CF module, as it also commits to formulating CF 6-36 products according to national, regional and global dietary guidelines, partly meeting Recommendation 3 of the guidance associated with WHA 69.9.
- The Charter clearly states that the company takes responsibility to ensure that its conduct at every level conforms to this policy (partly meeting Article 11.3) and also commits to apprising each member of its marketing personnel of the BMS marketing policy and their responsibilities relating to it (Article 11.5). However, no commitment was stated regarding collaboration with governments in their efforts to monitor the application of The Code (Article 11.2).

As stated earlier, given that complementary foods for older infants and young children 6-36 months of age comprise the vast majority of the company's sales across all markets, developing policy commitments in relation to the marketing of these products, particularly dealing with the appropriate messaging, cross-promotion and conflict of interests in the healthcare system, it is essential that the company extends its Charter or develops a new marketing policy to address these products, which is fully Code aligned. It is notable, though, that KraftHeinz's Charter applies to its sales of infant formulas and follow-



on formulas in all markets. The company only sells its BMS products in three lower-risk countries.

Management systems

Compared to the 2018 assessment where there was no evidence to assess KraftHeinz's management systems, the company has provided some evidence for the 2021 Index relating to implementation and monitoring of BMS policy commitments (Article 11). This includes having established comprehensive whistleblowing procedures and having systems in place to investigate alleged non-compliance across all markets. However, there are no management systems in place with regards to the remaining commitments with The Code and none in relation to CF 6-36 marketing.

Therefore, in addition to take steps to extend its Charter to fully align with The Code, including commitments related to CF 6-36 marketing, to improve its performance KraftHeinz needs to demonstrate evidence of providing clear instructions to all staff on how to interpret these commitments along with procedures to ensure that all of its commitments are implemented in full and consistently across all markets.

Policy commitments on lobbying

At the time of the research, KraftHeinz had not published any BMS-specific information about its lobbying activities and therefore does not score on this section. To improve its performance, KraftHeinz would need to make more information about its lobbying activities publicly available. (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

While ATNI was undertaking Index research, KraftHeinz had not yet published its Charter and therefore did not score on disclosure. To improve its performance in this area, KraftHeinz should ensure that all information specific in the methodology, is made available in the public domain.



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 | In respect of the products covered by the company's policy, KraftHeinz follows national regulations where they are stricter than its policy, in addition to its own policy. If national regulations are weaker than its policy, or absent, KraftHeinz follows its own policy across all markets including both higher- and lower-risk countries. | |
| Complementary foods: 0-6 months | ✓ | ✗ | Out of scope | | |
| Follow-on formula: 6-12 months | ✓ | ✓ | All markets | | |
| 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 module 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. $(IF \text{ score} * IF \text{ weighting} * 0.95) + (CF \text{ 0-6 score} * CF \text{ weighting} * 0.95) + (FOF \text{ score} * FOF \text{ weighting} * 0.95) + (GUM \text{ score} * GUM \text{ weighting} * 0.95) + (CF \text{ 6-36 score} * CF \text{ weighting} * 0.05)$. 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.



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 | No | Yes | No | No |
| Initial Corporate Profile score (Table 1) | | 20% | | | | |
| 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 | 7% | 5% | 4% | 4% | 1% |
| Step 3 | Score after product weight applied based on policy coverage | 7% | 0% | 4% | 0% | 0% |
| Step 4 | Score after geographic penalty applied if any (x 25%) | 7% | 0% | 4% | 0% | 0% |
| Step 5 | Score with regulatory penalty applied if any (x additional 15%) | 7% | 0% | 4% | 0% | 0% |
| Step 6 | Final score by product type | 7% | 0% | 4% | 0% | 0% |
| Final Corporate Profile score (sum of product type final scores) | | 11% | | | | |
| Adjustment to Global Index 2021 score (out of -0.75) | | -0.67 | | | | |

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.

KraftHeinz'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 |
|--|--|---|
| 0% | 13% | 11% |

KraftHeinz'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, the score significantly improves by 13%. This indicates that the change in the score is primarily attributed to the company's engagement in the research process and with having shared its BMS Marketing Charter which was not accessible to complete the 2018 assessment.



BMS/CF 2: In-country assessments

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

| Country | Market share ^e | BMS /CF brands sold |
|-------------|--|---------------------|
| Philippines | The Philippines is not an official market for KraftHeinz's products. | |
| Mexico | <5% | Heinz (CF) |

Findings

Given that KraftHeinz does not sell its CF 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. 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. Additional detail is available in ATNI's Summary Reports for each country and in Westat's reports.

Table 4: Summary of key findings in Mexico

| | Philippines | Mexico | Total |
|--|-------------|--------------|------------|
| Total number of legitimate BMS/CF products found in the market | N/A | 35 | 35 |
| Infant formula | N/A | 0 | 0 |
| Complementary foods < 6 months | N/A | 0 | 0 |
| Follow-on formula | N/A | 0 | 0 |
| Growing-up milks | N/A | 0 | 0 |
| Complementary foods 6-36 months | N/A | 35 | 35 |
| Total observed incidences of non-compliance identified | | 5 | 5 |
| Infant formula | N/A | 0 | 0 |
| Complementary foods < 6 months | N/A | 0 | 0 |
| Follow-on formula | N/A | 0 | 0 |
| Growing-up milks | N/A | 0 | 0 |
| Complementary foods 6-36 months | N/A | 5 | 5 |
| Non-specified products* | N/A | 0 | 0 |
| Ratio of incidences of observed non-compliance to products assessed | N/A | 0.14 | |
| Level of compliance | N/A | High | |
| Aggregate score (Mexico only) | N/A | 66% | 66% |
| Adjustment to Global Index 2021 score (out of -0.75) | | -0.26 | |

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.

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

^d 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.

^e 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.

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

- There were no findings in Mexico of advertisements or promotions on either traditional or online media that do not comply with Recommendation 4 of the guidance associated with WHA 69.9, given that only CF 6-36 products are available in the market. No point-of-sale promotions were found in Mexico that do not comply with the recommendations in the guidance associated with WHA 69.9.

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

- Given that it was not possible to do this assessment in Mexico due to COVID-19 restrictions, and it was only undertaken in the Philippines which is not an official market for KraftHeinz, this assessment is not applicable to the company.

Article 7: Marketing to healthcare workers (Philippines only)

- Given that it was not possible to do this assessment in Mexico due to COVID-19 restrictions, and it was only undertaken in the Philippines which is not an official market for KraftHeinz, this assessment is not applicable to the company.

Article 9: Labelling

- In Mexico, five product labels (CF 6-36) were missing the required wording stated in Recommendation 4 of the recommendations in the guidance associated with WHA 69.9 on the importance of continued breastfeeding for up to two years or beyond.



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 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 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 KraftHeinz'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 | No KraftHeinz products sold in this market | | |
| Mexico | 0 | 0.00 (Complete) | 0 |

KraftHeinz's level of compliance in 2021 excluding the results related to the guidance associated with WHA 69.9 would be complete based on the BMS/CF 2 findings in Mexico. No BMS products were found for KraftHeinz in Mexico; all the non-compliances were attributed to the company's CF products. In a like-for-like comparison with the 2018 BMS 2 results, KraftHeinz's overall level of compliance improves from 0% compliance to 100% compliance.

Accordingly, in a like-for-like comparison, the final combined score for KraftHeinz of the BMS/CF 1 and BMS/CF 2 assessments excluding findings related to the guidance associated with WHA 69.9 would be 57%, 19% higher than 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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