



Reckitt

United Kingdom



About the company^a



Baby food global market share (2019)	5%
Percentage of baby food revenues out of total revenues (2019)	23%
Key global baby food brands	Enfa: Enfamil and Enfagrow ; Lactum; Nutramigen; Alacta

	Weight	Score		
		2021	2018	2016
BMS/CF 1: Corporate Profile	50%	47%	19%	10%
BMS/CF 2: In-country assessment	50%	17%	0%	0%
Total	100%	32%	10%	5%
Impact on Global Index 2021 score		N/A	N/A	N/A

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. Reckitt 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 Source: Euromonitor International; Packaged Food, 2021 Industry Edition; RB, [Annual Report and Financial Statement 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 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 Reckitt 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 ^c	Topic	2021 score	2018 score	2016 score
Breast-milk substitute Module					
1	Introduction	Overarching commitments	81%	69%	44%
2	4	Information and education	71%	25%	9%
3	5	The general public and mothers	87%	67%	30%
4	6	Healthcare systems	70%	20%	11%
5	7	Healthcare workers	83%	29%	25%
6	8	Persons employed by manufacturers and distributors	54%	50%	0%
7	9	Labelling	56%	28%	7%
8	10	Quality	100%	83%	50%
9	11	Implementation	92%	42%	22%
10		Lobbying (policy and objectives)	94%	0%	0%
11		Disclosure	74%	0%	13%
Initial Corporate Profile score (BMS module only)			78%	38%	19%

^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

Since the 2018 assessment, Reckitt has strengthened its overarching commitments and now explicitly commits to support exclusive breastfeeding for the first six months and continued breastfeeding up to two years or beyond. While it now explicitly acknowledges the importance of The Code and subsequent WHA resolutions, the policy does not explicitly reference or state support for the recommendations made in the guidance associated with WHA 69.9.

Policy commitments on marketing

Following the acquisition of Mead Johnson in 2017, Reckitt published a new BMS Marketing Policy with strengthened commitments across all aspects of BMS marketing, as well as a separate Interactions with Healthcare Professionals and Healthcare Entities policy. The company's new BMS Marketing Policy maintained full alignment with Article 10 on product quality and meeting relevant standards and its policy now fully covers commitments towards implementation and monitoring according to Article 11.

Although Reckitt has substantially improved its commitments in relation to BMS marketing and aligned the wording of its policies more closely to The Code, some gaps remain in relation to both the original 1981 Code and various WHA resolutions, including the guidance associated with WHA 69.9. In summary:

- It has strengthened its commitments with regards to informational and educational material intended to reach mothers and caregivers (Article 4), but its policy falls short of covering all WHA 58.32 and WHA 61.20 requirements on the safe preparation of powdered formula.
- Reckitt now aligns more closely with Article 5 as it ensures that its marketing personnel do not seek any direct or indirect contact with mothers and caregivers (Article 5.5). However the policy is still missing commitments to implement the guidance associated with WHA 69.9.
- Reckitt's two policies that address marketing within the healthcare system substantially strengthen previous commitments relating to Article 6 though its

commitments do not extend to the recommendations set out in the guidance associated with WHA 69.9 in full. For example, they do not commit not to use healthcare facilities to host events, contests or campaigns, nor not to use them to provide direct or indirect education to parents and caregivers on infant and young child feeding (Recommendation 6). Reckitt has also improved its commitments in relation to health workers (Article 7) but does not incorporate WHA 69.9 Recommendation 6 of the guidance associated with WHA 69.9 on not sponsoring any meetings of health professionals and scientific conferences whatsoever.

- The new BMS policy strengthens commitments in relation to Reckitt's incentives system. However, it does not fully align with Article 8.1 of The Code as bonuses are calculated based on the overall sales of all products marketed, including the sales of products covered by the BMS policy. Although the calculated bonus payments are not exclusively attributed to the sales of these covered products, to fully align with The Code the policy should be not to include any form of product sales covered by The Code in bonus calculations.
- Reckitt has improved its commitments relating to the labelling of its BMS products (Article 9). However, these do not encompass recommendations in relation to the guidance associated with WHA 69.9, particularly in relation to the additional information required and prohibited on follow-on formula and growing-up milks (Recommendation 4). The policy also does not cover the WHA 63.23 requirement to exclude any health or nutrition claims on BMS products even where they are allowed in local regulation.

Although Reckitt's BMS Marketing policy is substantially better aligned with The Code, it continues to apply solely to infant formula and follow-on formula in higher-risk markets. To fully align to The Code, Reckitt's policy should be extended to apply to all products covered by The Code, including growing-up milks, and apply it in all markets, including lower-risk markets.

Management systems

The improvements in Reckitt's new BMS Marketing Policy are also reflected in its stronger management systems. The company was able to provide more documented



evidence of the directives and procedures used to implement the new commitments, although they remain incomplete due to the company's omission from its policy of commitments relating to the guidance associated with WHA 69.9 (i.e., if there are no policy commitments, there are no related management systems to implement them).

Policy commitments on lobbying

For the first time Reckitt has also disclosed its lobbying policy and its engagement objectives in relation to addressing BMS-related issues with policymakers. However, the company did not achieve a full score because it did not explicitly commit not to undermine 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 this Index, see ATNI's report Spotlight on Lobbying, published in June 2021).

Disclosure

In the 2021 assessment, Reckitt has notably improved in its disclosure and transparency related to BMS marketing. Whereas in 2018, the company did not publish any documentation, it has significantly improved its transparency, to the extent that it achieved the highest score among all the nine companies on disclosure. Areas that still require improvement include disclosure of its internal compliance assessments in relation to its Code-aligned commitments, as well as related to its lobbying activities.



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	Geographical coverage	Stance on application of policy in relation to local regulations
Infant formula: 0-6 months	✓	✓	High-risk countries ^d	Reckitt follows national regulations where they are stricter than its policy, in addition to its own policy. In higher-risk countries where national regulations are weaker than its policy, or absent, Reckitt follows its own policy.
Complementary foods: 0-6 months ^e	-	-	-	
Follow-on formula: 6-12 months	✓	✓	High-risk countries	
Growing-up milks: 12-36 months	✓	✗	Out of scope	-
Complementary foods: 6-36 months	-	-	-	

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 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 countries: Country that 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.

^e While Reckitt's BMS Marketing Policy covers complementary foods under six months of age, the company shared that it does not currently manufacture this product type.



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)		78%				
Product type weighting of Initial Corporate Profile score (100% BMS module)		60% ^f	N/A	20%	20%	N/A
Step 2	Initial score for each product type with product type weighting applied	47%	N/A	16%	16%	N/A
Step 3	Score after product weight applied based on policy coverage	47%	N/A	16%	0%	N/A
Step 4	Score after geographic penalty applied if any (x 25%)	35%	N/A	12%	0%	N/A
Step 5	Score with regulatory penalty applied if any (x additional 15%)	35%	N/A	12%	0%	N/A
Step 6	Final score by product type	35%	N/A	12%	0%	N/A
Final Corporate Profile score (sum of product type final scores)		47%				
Adjustment to Global Index 2021 score (out of -0.75)		N/A				

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

Reckitt'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
19%	50%	47%

Reckitt's final 2021 Corporate Profile score would have been 3% higher if ATNI had not incorporated changes in relation to the guidance associated with WHA 69.9 within the BMS module assessment.

However, in a like-for-like comparison between the 2018 and 2021 final Corporate Profile results there is a 31% difference which indicates that Reckitt's change in the final score is primarily attributed to the new and more comprehensive BMS marketing policy even though it still does not implement the recommendations set out in the guidance associated with WHA 69.9.

^f Given that the company derives ≥5% of its baby food revenues from BMS sales but not from CF sales, the Corporate Profile assessment and score is solely based on the BMS module. In this case, because Reckitt 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^g

Country	Market share ^h	BMS/CF brands sold
Philippines	40%-50%	Enfa; Alacta; Lactum; Nutramigen
Mexico	10%-20%	Enfa; Nutramigen; Pregestimil; Puramino

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	17	27	44	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
Infant formula	8	17	25	
Complementary foods < 6 months	-	-	-	
Follow-on formula	4	2	6	
Growing-up milks	5	8	13	
Complementary foods 6-36 months	-	-	-	
Total observed incidences of non-compliance identified	19	66	85	
Infant formula	6	10	16	
Complementary foods < 6 months	-	-	-	
Follow-on formula	4	3	7	
Growing-up milks	7	49	56	
Complementary foods 6-36 months	-	-	-	
Non-specified products*	2	4	6	
Ratio of incidences of observed non-compliance to products assessed	1.11	2.44		
Level of compliance	Medium	Low		
Aggregate score (Philippines and Mexico)	33%	0%	17%	
Adjustment to Global Index 2021 score (out of -0.75)	N/A			

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

^g 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.

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



In-country assessments: Analysis

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

- One piece of equipment/material was observed at one of the 43 health facilities included in the study in the Philippines. It was a Lactum branded child's medical record book donated by Reckitt (Article 4.3).
- 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

- In the Philippines, three incidences of non-compliance were observed for growing-up milks in relation to advertising on traditional media outlets (Article 5.1), and similarly three such findings were observed in Mexico. However, in Mexico, a total of 25 adverts were also observed online (Article 5.1) on both the company's own media and parenting sites. Ten of these findings were related to e-mails received after researchers signed up online as invited by the company to receive marketing. These e-mails additionally reflect indirect contact initiated by the companies with mothers and caregivers (Article 5.5).
- As opposed to the Philippines study where there were no findings observed of point-of-sale promotions either online or in physical retail outlets (Article 5.3), there were a total of 29 such findings in Mexico. In total, 21 price promotions were found on online retailers' sites, the majority being attributed to growing-up milks, whereas eight incidences were found in physical retailers, some of which were in the form of incentives to purchase products or price promotions, and one promoting a free gift.

Article 6: Marketing within healthcare systems (Philippines only)

- One incidence of promotional material, a donated mattress cover branded with a Reckitt product Lactum was observed within a healthcare facility in the Philippines. The fact that a brand name and/or logo was displayed resulted in non-compliance with The Code's original recommendations (Article 6.8), and the subsequent recommendation of the guidance associated with WHA 69.9 that no equipment should be donated (Recommendation 6). One healthcare worker also reported that Reckitt offered to donate a piece of equipment (a scale liner).

- Due to COVID-19, no healthcare facilities were visited in Mexico to undertake this form of assessment.

Article 7: Marketing to healthcare workers (Philippines only)

- In the Philippines, there were two reported instances of healthcare professionals being contacted by Reckitt to provide samples of BMS products to mothers (Article 7.4 and Recommendation 6 of the guidance associated with WHA 69.9).
- There were also seven reports by healthcare workers in the Philippines of being contacted by Reckitt representatives regarding payment to cover the cost of attending events or workshops outside their facilities (Article 7.5, superseded by Recommendation 6 of the guidance associated with WHA 69.9 that states that there should be no sponsorship of any meetings of health professionals and scientific conferences whatsoever).
- While these results are not included in the company's score (as they are considered subjective, prone to recall bias and cannot be verified), they provide additional insights into common marketing practices.
- Due to COVID-19, no healthcare facilities were visited in Mexico to undertake this type of assessment.

Article 9: Labelling

- In the Philippines, 14 BMS product labels were found to be missing instructions that powdered formulas should be prepared one feed at a time and/or that left-overs of the product need to be discarded immediately. (This is recommended in the WHO/FAO guidelines on safe preparation, storage and handling of powdered infant formula, referenced in WHA 61.20, but is not a requirement of local regulations). All nine product labels in Mexico were also missing the instruction on ensuring that powdered formulas are prepared one feed at a time, which is an instruction the NetCode Protocol indicates should be included).
- One of Reckitt's product labels in Mexico was also missing information as per Article 9.2 requirements and one did not comply 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, as it included an endorsement by professionals.



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 Reckitt'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	Relative level of compliance excluding WHA 69.9 results	Total number of incidences of non-compliance excluding WHA 69.9 results
The Philippines	17	1.11 (Medium)	19
Mexico	27	2.44 (Low)	66

Reckitt'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 either countries. The company does not sell CF products Mexico. One of the BMS product labels was found to be non-compliant with Recommendation 4 of the guidance associated with WHA 69.9 due to including an endorsement by professionals, that same product was also found to have other non-compliances with The Code. Therefore the exclusion of this finding related to the guidance associated with the guidance associated with WHA 69.9 did not change the total number of incidences found. The number of non-compliant labels is counted not the total number of non-compliances attributed to them. In a like-for-like comparison with the 2018 BMS 2 score (which was 0%), discounting the findings relating to WHA 69.9 in 2021, Reckitt's overall level of compliance would improve by 17%.

Accordingly, in a like-for-like comparison, the final combined score for Reckitt of the BMS/CF 1 and BMS/CF 2 assessments excluding findings related to the guidance associated with WHA 69.9 would be 33%, 1% higher than its 2021 final score.

See Reckitt's response to ATNI's 2021 BMS/CF Marketing Index [here](#).



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ATNI is an independent organization that bases its work on the input of many stakeholders. The findings, interpretations, and conclusions expressed in this report may not necessarily reflect the views of all companies, members of the stakeholder groups or the organizations they represent, or of the funders of the project. This report is intended to be for informational purposes only and is not intended as promotional material in any respect. This report is not intended to provide accounting, legal or tax advice or investment recommendations. Whilst based on information believed to be reliable, no guarantee can be given that it is accurate or complete. 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.

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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