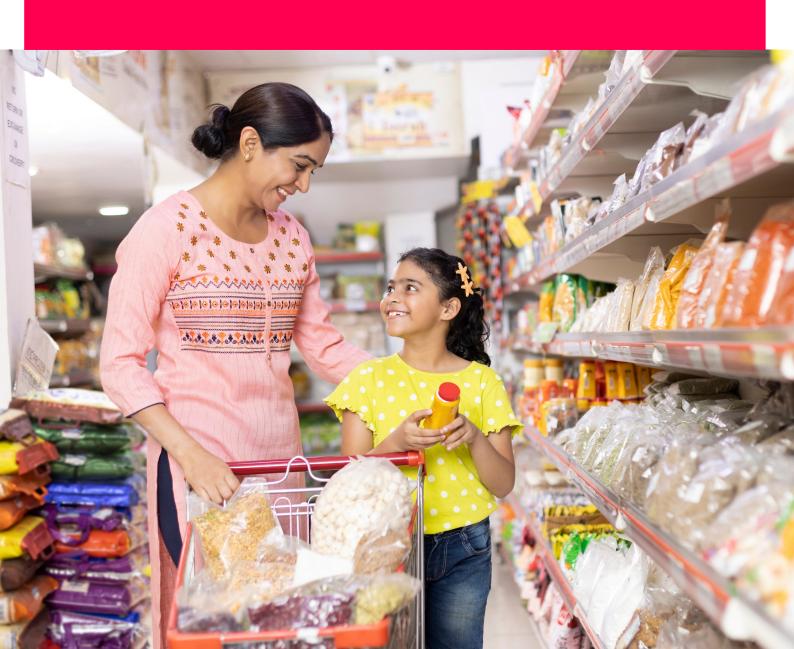


India Index 2023

Executive Summary

November 2023



About ATNI

The Access to Nutrition Initiative (ATNI) is pleased to present the 2023 India Index, building on the 2016 and 2020 editions.

The 2023 India Index assesses the performance of 20 of the largest Indian F&B manufacturers which together comprise 36% of total sales of processed foods in the country.

The findings of the 2023 India Index show that the influence of the F&B industry is growing. It has both the responsibility and the opportunity to further embed nutrition into its core business improving product offerings for consumers. Actioning the Index recommendations is critical in the current context and will facilitate F&B manufacturers to play a more vital part in addressing pressing nutrition-related concerns and ensuring that a healthy, affordable diet is available to all.

ATNI and its partners hope that the India Index 2023 provides useful data and analyses that support companies, investors, civil society and policymakers to make informed steps towards improving nutrition in India. ATNI invites you to share the 2023 India Index across your networks and hopes to work with you to improve access to nutritious foods for all in India.

The full India Index 2023 Report can be found at www.accesstonutrition.org.

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Key Messages

The food and beverage (F&B) industry plays an increasingly pivotal role in determining what consumers in India eat, the quality of their diets, and resulting health impacts.

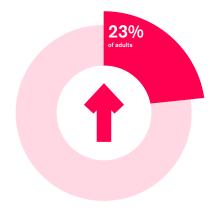
The 2023 India Index measures the performance of 20 of the largest Indian F&B manufacturers which, together, comprise 36% of total sales of processed foods in the country.

Between 2016-2021, the food processing sector in India grew at an average annual rate of around eight per cent and emerged as an important segment of the Indian economy in terms of its contribution to gross domestic product (GDP), employment, and investment.¹

Sales of packaged F&B in India have surged by 15% every year since 2011, outperforming total food sales. Spending on F&B increased at a rate of 9% per year between 2011 to 2021.³

Rates of micronutrient deficiencies in India remain a significant public health issue. Meanwhile overweight now affects over 23% of adults and while 35.5% of children under five are stunted, 3.4% are overweight.²

Based on 1,901 products analysed from the 20 indexed companies, 76% of sales are derived from less healthy products⁴. Nineteen of the 20 companies derive most of their sales revenue from less healthy products.





There is no agreed definition of what constitutes a healthy food so companies resort to using their own definitions that are not necessarily aligned with each other or with (inter) nationally-recognized standards.

Seven out of 20 indexed companies report having at least one (re) formulation target in place to reduce nutrients of concern (e.g. sodium, saturated fat, sugar) in their portfolio and half of the companies have a nutrition strategy in place.

Five companies show evidence of having clearly defined workforce nutrition programs in place, of which two companies clearly include measurable targets.



Seven out of 20 companies were found to have a responsible advocacy policy in place.

Five institutional investors and shareholders of food companies in India have now signed up to nutrition frameworks such as the Investor Expectations on Nutrition, Diets and Health as part of their responsible investment strategies.

Seven companies have a publicly available policy on responsible marketing to children.

The findings of the 2023 India Index show that the F&B industry has significant opportunity to improve its product offerings making them healthier and more affordable for all consumers in India.

^{4 &#}x27;Healthy products' refers to products meeting the 'healthy' threshold of 3.5 Health Stars



¹ Ministry of Food Pressing Industries, Government of India, Annual Report 2022-23, available at; https://www.mofpi.gov.in/sites/default/files/mofpi_annual_report_2023_eng_5-6-2023_new.pdf

² NFHS-5, 2019-2021, Ministry of Health and Family Welfare Government of India, available at; https://main.mohfw.gov.in/sites/default/files/NFHS-5 Phase-II 0.pdf

^{3 &}quot;The Growth of Ultra-Processed Foods in India: An Analysis of Trends, Issues and Policy Recommendations" (New Delhi: World Health Organization Country Office for India, 2023), https://www.who.int/publications/i/item/9789290210672

Executive summary

Sales of packaged food and beverages in India have surged by 15% year-onyear since 2011, outperforming total sales of food. Meanwhile sales of highly processed foods typically high in fat, salt or sugar (HFSS) are projected to double by 2030. Amid these trends India has managed to make progress on reducing stunting among children, while levels of micronutrient deficiencies and obesity are rising

ATNI's analysis of the healthiness of 20 of the country's largest F&B manufacturers' products shows there have been incremental improvements since its first analysis in 2016. These trends stress the urgency, opportunity and responsibility for food companies, investors and public health and food authorities in India to ensure processed packaged foods meet healthiness standards. Doing so would enable consumers to follow dietary guidelines and eat better while simultaneously preventing millions of cases of obesity and micronutrient deficiency.

The F&B industry plays an ever-growing role in determining what consumers in India eat, the quality of their diets, and the resulting health impacts.





The impact of processed foods on public health in India

Linked with India's rapid economic growth is a parallel transition in dietary patterns and an increased consumption of processed foods. India's food processing industry is now the sixth largest in the world, expected to reach INR 40.1 trillion (\$480 billion) by 2026. Between 2016-2021, the food processing sector in India grew at an average annual rate of around 8%.

Consumer spending on all F&B products increased at a rate of 9.6% per year from 2011 to 2021 and the total sales value of processed foods has increased at a compound rate of 15.32% per year.⁷

Further, between 2011 and 2021, retail sales of highly processed food – HFSS foods such as chocolate and sugar confectionery, salty snacks, sweetened beverages, ready-made and convenience food, and breakfast cereals – has grown at a compound rate of 13.37% per year, and is projected to double by 2030,

growing faster than processed staples and essential foods. Such consumption patterns are prevalent throughout the Indian population, including among lower-income and rural Indian consumers.

Amidst these consumption trends, the triple burden of malnutrition continues to represent a mounting public health challenge. Rates of micronutrient deficiencies in India remain a major public health issue, while overweight now affects over 23% of adults and is projected to continue increasing in adults and children. 9,10

While the causes of both micronutrient deficiencies and obesity are multifactorial, changes in consumers' diets likely play a significant role. The substantial increase in the consumption of highly processed F&B products -- which in turn displaces more traditional foods that require less industrial processing such as whole grains, fruits, vegetables, nuts, and legumes -- characterizes this trend.

- 5 Invest India. Available from: https://www.investindia.gov.in/sector/food-processing
- 6 Ministry of Food Pressing Industries, Government of India, Annual Report 2022-23, available at; https://www.mofpi.gov.in/sites/default/files/mofpi annual report 2023 eng 5-6-2023 new.pdf
- 7 "The Growth of Ultra-Processed Foods in India: An Analysis of Trends, Issues and Policy Recommendations" (New Delhi: World Health Organization Country Office for India, 2023), https://www.who.int/publications/i/item/9789290210672
- 8 Ibid
- 9 NFHS-5, 2019-2021, Ministry of Health and Family Welfare Government of India, available at; https://main.mohfw.gov.in/sites/default/files/NFHS-5_Phase-II_0.pdf
- 10 World Obesity Atlas 2023, available from: https://s3-eu-west-1.amazonaws.com/wof-files/World_Obesity_ Atlas_2023_Report.pdf



2. What is the 2023 India Index?

The Access to Nutrition Initiative (ATNI), a global nonprofit, was established in 2013 to measure and drive forward private sector accountability for nutrition. To measure the performance of the Indian F&B sector, ATNI assessed the largest F&B manufacturers in both 2016 and 2020 on their contribution to healthier diets for all Indians.

The 2023 India Index benchmarks 20 of the largest F&B manufacturers in the country, of which 14 are publicly listed either on Indian

or global stock exchanges.¹² Together they account for 36% of total sales of processed packaged foods.

The Index methodology deploys 58 indicators across seven categories against which companies are scored.¹³ Each category is weighted according to the relative impact it is considered to have on diets of consumers across India, building on evidence generated from ATNI's 10-year Index experience.¹⁴

Category	Weighting %
Product	45%
Nutrition Governance	10%
Accessible and Affordable Healthy Products	15%
Responsible Marketing	15%
Workforce Nutrition	5%
Labelling	5%
Policy Engagement	5%

For this Index, ATNI placed a greater focus on assessing the nutritional quality of products in companies' portfolios. The Index deployed the internationally recognized Health Star Rating nutrient profiling model, which is also endorsed by several governments. Products with a score of 3.5 stars out of 5 or above (≥3.5 HSR) can be confidently promoted in public settings as healthier choices. Assessments of formal targets, strategies, and policies, rather than broad commitments and general statements, were started based on information found on the companies' public domains.

To obtain a fuller picture of companies' contributions to healthy and sustainable diets or all — and to stimulate interaction and knowledge exchange with companies — ATNI offered companies the opportunity to review the information found and submit additional evidence that is not in the public domain. Fourteen out of 20 companies took this opportunity and also provided product nutrient data, although degrees of engagement varied significantly.

- 11 To ensure independence, ATNI is funded by philanthropies and governments and does not receive funding from the private sector.
- 12 The companies were selected based on Euromonitor International 2021 sales data and impact on nutrition and health of Indian consumers, by including a diversity of product portfolio's including staple foods, dairy products, edible oil, cooking ingredients, snacks and beverages. Baby foods, tea and coffee, and herbs and spices are excluded.
- 13 The methodology assesses activities related to the company's commercial operations that go beyond regulation: non-commercial initiatives, such as corporate social responsibility (CSR) and philanthropy, are not taken into consideration, nor actions that are required by regulation.
- 14 Indicators and category weightings are reviewed with ATNI's India Expert Group and independent global advisors. Indicators are based on national and/or international guidelines wherever possible; where such guidance is not readily available, ATNI identifies best practices from the literature, its previous Indexes, and through consultation with stakeholders.



Thus the 2023 India Index provides the current state of play of F&B companies and their relative progress across key nutritionrelated topics. Priority areas for improvement are also identified. The Index can be used by a range of different stakeholders to drive progress including among: companies and industry associations, to show how their practices can be improved, compare with their peers, and incentivize progress; responsible investors, as a tool for decision-making on investing in and engagement with companies; policymakers, to help identify priority areas for regulation and government-led action; and civil society, as an evidence-base for engagement with industry as well as with consumers.





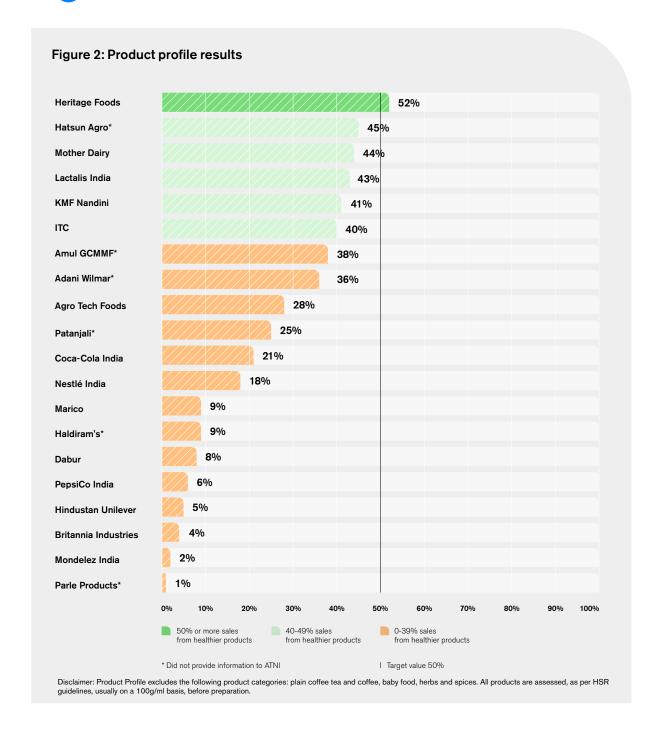
3. Main findings

There is considerable variation in the performance of companies. A summary finding for each category is provided here with more detailed category-specific findings presented in the chapters, full report can be found at www.acccesstonutrition.org/index/india-index-2023//index/.

		ducts** 15%)	Governance (10%)	Accessibility (15%)	Marketing (15%)	Workforce Nutrition (5%)	Labelling (5%)	Policy Engagement (5%)	Overall Score (100%)
	B1	B2+B3						· ·	1
Adani Wilmar*	4,0	0	0,6	0	0	0,7	0	4,6	1,5
Agro Tech Foods	4,0	0	0,8	0	1,4	0,7	1,7	1,3	1,7
Amul GCMMF*	4,6	0	0,6	0	0	0	3,3	0	1,6
Britannia Industries	1,4	3,1	3,3	0	4,6	1,0	3,3	0,6	2,1
Coca-Cola India	2,5	0	1,4	0	5,8	1,6	7,5	0,6	2,2
Dabur	1,7	1,1	0,8	0	1,4	0,7	0	0,6	1,0
Haldiram's*	2,5	0	0	0	0	0	3,3	0	0,9
Hatsun Agro*	4,8	0	0	0	0	0	0	2,5	1,6
Heritage Foods	5,8	0	1,9	0	0	0,7	0	2,5	2,1
Hindustan Unilever	1,3	7,3	6,9	3, 8	8,0	7,0	5,8	6,5	4,9
ITC	4,4	6,6	9,4	6,6	5,7	7,4	6,7	8,5	6,2
KMF Nandini	4,5	0	0	0	0	0,9	0	0	1,4
Lactalis India	5,0	0	0	0	0	0	0,8	0	1,5
Marico	2,9	1,3	1,7	0	1,4	1,5	3,3	1,3	1,7
Mondelez India	0,9	1,8	1,9	0	4,3	2,2	3,3	2,7	1,8
Mother Dairy	5,1	0,4	0,9	0	0	0,4	0	0	1,7
Nestlé India	2,6	4,6	1,9	2,1	7,1	2,7	5,0	5,4	3,7
Parle Products*	1,5	0	0	0	1,4	0	0	0	0,6
Patanjali*	3,6	0	0	0	0	0	0	0	1,1
PepsiCo India	1,5	5,7	2,2	0,9	5,3	3,0	7,5	4,6	3,2
Average Seere	20	16	17	0.7	0.2	15	26	01	01
Average Score	3,2	1,6	1,7	0,7	2,3	1,5	2,6	2,1	2,1



3.1 Product portfolios



Based on 1,901 products analysed from the 20 indexed companies, 76% of sales are derived from less healthy products.¹⁵ 19 of the 20 companies derive most of their sales revenue from less healthy products. The mean healthiness of companies' products was found to be 1.9 stars out of 5.0 (the same as in 2020), with substantial variation observed between companies. Over half (55.6%) of all products on the market scored 1.5 out of 5 stars or below. Overall, 12% of products were eligible to be marketed to children according

15 If the product has an Health Star Rating (HSR) of 3.5 or more out of 5 it meets the healthy threshold. ATNI/TGI use the internationally recognized and government endorsed HSR NPM. Products with a score of 3.5 stars out of 5 or above (≥3.5 HSR) can be confidently promoted in public settings as healthier choices. Reference: Dunford, E., Cobcroft, M., Thomas, M., Wu, J.H. (2015). Technical Report: Alignment of the NSW Healthy Food Provision Policy with the Health Star Rating System. Available at: http:// www.health.nsw.gov.au/heal/Publications/health-star-rating-system.pdf



to the World Health Organization South-East Region (WHO SEAR) criteria (21% after salesweighting was applied). 16 There is no recognized definition of healthy, and there is a lack of alignment between company definitions of 'healthier' with (inter)nationally-recognized standards. Seven companies were found to have at least one (re)formulation target in place to reduce nutrients of concern (e.g., sodium, saturated fat, and sugar) in their portfolio.¹⁷ Ten companies reported they are currently voluntarily fortifying or enriching processed standardized food and beverage food products. This includes products that could classify for placing the F+ logo front of pack (cereal products, bakery wares or fruit juices).

Many of these foods have low healthiness scores. Popular products that fall into this category include for example, fortified energy drinks and sweet dairy drinks with high sugar content.

Several companies have taken important steps, including the adoption of a nutrient profiling model (NPM) to guide reformulation and classify products as 'healthier'. However, different definitions and thresholds used for 'healthier' undermines many aspects of companies' activities for which it can be used — such as target-setting, defining 'affordable nutrition', and responsible marketing — both in terms of their credibility and positive impact on public health.



3.2 Corporate nutrition strategy and governance

Companies continue to publicly acknowledge the need to improve the healthiness of their products and their role in consumers' diets. However, this recognition is not always translated into healthier products (see above), and clear definitions coupled with ambitious targets and action required to drive meaningful progress.

There is a dearth of specific, measurable, and timebound targets to drive progress on companies' strategies, especially for 'healthy' sales; along with a lack of consistent and systematic reporting on implementing strategies. Further, few companies in India assign formal accountability for their nutrition goals to the highest levels of the company.



3.3 Delivering affordable and accessible healthy products

Four companies showed evidence of having a formal affordability approach or strategy to make 'healthier' foods (according to the company's definition of healthy) more available coupled with a definition of 'lower-income consumers' in India. However, apart from one company, transparency regarding these initiatives was limited, none had disclosed targets, and evidence of implementation was unclear.



3.4 Responsible marketing

Seven companies were found to have a publicly available responsible marketing policy for all audiences including children.

Four more companies have made commitments to market their products in a responsible manner to all audiences through their membership with ASCI, but have not published their own responsible marketing policies.

Seven companies report that compliance with their marketing to children policies is audited. Two companies commit not to market any products to children below 13 years of age, while other companies use company- or industry-defined nutrition criteria for marketing to children, rather than the WHO SEAR criteria. Two companies have set an age threshold of 16 for marketing to children, while one company has aligned their age threshold for marketing to children with the WHO- and UNICEF-recommended 18 years of age, also in line with the latest mandatory Central Consumer Protection Authority (CCPA) guidelines.



3.5 Supporting healthy diets and nutrition programs in the workforce

Five companies showed evidence of having clearly defined workforce nutrition programs in place, of which two companies include measurable targets. Nine companies show some evidence of making healthy food available at work or provide their employees with nutrition-focused health checks. Four companies provide evidence of providing breastfeeding support at work through private hygiene rooms, refrigerators, and other flexible working arrangements (such as flexible working hours or creche facilities). Three

¹⁷ In many cases, these are new since 2020, replacing those made as part of their 2018 Eat Right Pledges.



¹⁶ In 2020 ATNI also found 12% of products eligible, but the sales weighted then was 29%.

additional companies clearly offer flexible working arrangements for breastfeeding mothers.



3.6 Product labelling

Six companies go beyond compliance with existing labelling regulation and provide nutritional information on front of pack (FOP) in a numerical format for key nutrients.

Companies are waiting for a decision on the proposed Indian Nutrition Rating (INR) FOP labelling system before introducing any new FOP labelling, to avoid confusing consumers and potentially wasting resources changing packaging designs. Companies show nutritional information online in a range of forms, to varying degrees of comprehensiveness.



3.7 Engaging with policymakers

Seven companies were found to have a responsible advocacy policy in place in India — although in most cases these articulated only high-level principles. Six companies state that they have systems in place to authorise and track advocacy engagements with policymakers in India. Twelve companies disclose comprehensive lists of trade association memberships in India, four of which also indicating the associations in which they hold Board seats (or equivalent).



3.8 Sustainability

Reductions of scope 1, 2, & 3 emissions — along with food loss waste (FLW) — are generally not yet reported by Indian food companies. Reducing plastic use and transitioning to sustainable forms of packaging appears to be the most frequent sustainability action for companies, with almost all companies demonstrating evidence of targets or activities in this space.



4. Recommendations

4.1 For companies

There is significant opportunity to improve performance, even among the companies that score higher in each category. Each category within the India Index 2023 includes general recommendations for F&B manufacturers. These have been specifically tailored for each company in the scorecards that are published in conjunction with this report. To better support nutrition outcomes in India, it is recommended that all companies consider taking the following actions:

1. Companies can improve their product portfolios so that at least half of their portfolio (sales and products) meet healthy thresholds by 2030.¹⁸ This 2030 target is in line with various global initiatives including the forthcoming 2030 CEO Compact on Healthy and Sustainable Diets, investor coalition expectations, and ATNI's strategic objective for the F&B sector.

Companies can decrease their reliance on sales of unhealthy foods by accelerating product (re)formulation, redirecting marketing to healthier products and brands, and consider nutrition as part of their merger and acquisition strategies.

Companies are encouraged to adopt specific, measurable, and time-bound targets to both reduce nutrients of concern and increase positive ingredients across their applicable portfolio.

Targets should apply to the entire India product portfolio (where relevant) and should be aligned with Indian dietary recommendations or standards.

Further, following global good practice, companies are encouraged to use an internationally recognized NPM (and where applicable the India government endorsed NPM) to measure, define and report on the

healthiness of products in their portfolio. Companies should publicly disclose on an annual basis the percentage of their product portfolio that meets these healthiness criteria.

2. To improve nutrition governance, companies are encouraged to fully integrate nutrition considerations into their commercial business functions.

This can be done by: a) assigning formal responsibility for the success of their nutrition strategy to the highest levels of seniority within the company in India; b) developing specific strategies to increase sales of 'healthier' products at a greater rate than unhealthy products, through pricing, distribution, and marketing investments, for example; and c) setting and reporting against a target to increase sales of products defined as 'healthier' relative to overall sales.

3. To deliver more affordable, and accessible products and improve lower-income consumers' diets in India, all companies should adopt and publish an affordability strategy.

This strategy should contain rigorous criteria for 'healthy', aligned with an (inter)nationally recognized/government-endorsed definition, as well as ensure comprehensive definitions and approaches are taken to define 'affordable' and 'low-income consumer'.

4. Companies are encouraged to develop and publish a comprehensive responsible marketing policy that covers all media channels and audiences, including for children under the age of 18.¹⁹

Companies should commit to not promote unhealthy products to children of any age. If companies have a small number of products suitable to be marketed to children, it is

- 18 This 2030 target is in line with forthcoming 2030 CEO Compact on Healthy and Sustainable Diets and ATNI's strategic objective.
- 19 This marketing target is in line with the mandatory CCPA 'Guidelines on the Prevention of Misleading Advertisements and Necessary Due Diligence for Endorsement of Advertisements' under the India Consumer Protection Act of 2019, WHO, and ATNI's strategic objective as well as the forthcoming 2030 CEO Compact on Healthy and Sustainable Diets



important that they implement responsible marketing policies to ensure these products are not undermining children's health.

5. Companies are encouraged to ensure they develop workforce nutrition programs, including healthy food at work, nutrition education, nutrition-related health checkups and breastfeeding support.

Companies should also define meaningful and quantifiable expected outcomes for their workforce nutrition programs including those related to health-related behaviours, health-related outcomes, or outcomes related to employee participation.

For example, companies could join the Workforce Nutrition Alliance (WNA) and utilize its self-assessment scorecards as a first step. If all 20 companies in this Index started a workforce nutrition program, an estimated 385.869 employees could be reached on access to and knowledge about healthy nutrition.

- 6. Companies are encouraged to adopt and publish a comprehensive nutrition labelling policy in alignment with regulations including FOP information, back-of-pack information and how label information is comprehensively addressed online.
- 7. As per global guidance, companies should adopt a responsible advocacy policy.

This should extend to cover any third parties advocating on behalf of the company. Through this policy a company should commit to: conduct themselves responsibly; be transparent about their identity and intentions; only present valid, independent, and representative evidence; and consider the wider public interest and public health in their efforts.

4.2 For investors

As shareholders, investors play a significant role in shaping food companies' governance, strategy and disclosure practices.

1. Investors can make use of existing nutrition frameworks such as ATNI's Investor Expectations on Nutrition, Diets and Health using this to integrate nutrition into responsible investment strategies.

Three Indian institutional investors have signed ATNI's expectations framework in 2023 and more are set to do so in the coming months.

2. Investors can use the findings of this Index to drive companies' progress on nutrition in India through various investment strategies.

This may include for example stewardship activities such as formal resolutions calling for transparency and standardization of companies' reporting across nutrition metrics.



4.3 For policymakers

1. A transparent definition of processed foods and NPM would help align the sector.

The government, in consultation with other stakeholders, can finalize the establishment of a clear and transparent definition of processed foods (that includes thresholds for salt, sugar and fat), and nutrient profiling system. Related, guidelines on the fortification of processed foods should be clarified and strengthened ensuring that only appropriate processed foods are fortified with micronutrients.

2. Global evidence on the effectiveness of fiscal incentives and health tax models is growing and could be deployed in India.

Once the definitions and NPM for processed foods are better defined by the government, a tax structure which is in line with these definitions can be defined. A health tax model can help focus on lower taxes for the healthier options and higher taxes for products which contain sugar, salt and/or fat beyond recommended levels.

These can help to make healthy products more affordable, deter the production of unhealthy products and help incentivize F&B manufacturers to reformulate products. Related, subsidies and other fiscal incentives can drive production, exports and consumption of healthier foods.

3. Clear and transparent labelling guidelines that incorporate the definition of highly processed foods and FOP labelling should be established.

Effective monitoring of these labelling guidelines should also be established to ensure compliance.

4. Environmental, social and governance (ESG) investing policies should integrate nutrition where appropriate.

In early 2023, the Security and Exchange Board of India (SEBI) introduced a new regulatory framework for ESG Disclosures which is part of the Business Responsibility and Sustainability Reporting mandates for India's largest publicly listed companies. Indicators relating to the social component of the framework include workforce disclosures.

To improve human capital in India, a required mandate related to workforce nutrition, including in supply chains should be added and universally applied to all companies including F&B manufacturers.



5. Conclusion

The F&B industry plays an increasingly pivotal role in determining what consumers in India eat, the quality of their diets, and resulting health impacts. The 2023 India Index provides an overview of the performance of 20 of the largest Indian F&B manufacturers which together comprise 36% of total sales of packaged processed foods in the country. The findings of the 2023 India Index show that the F&B industry has the responsibility and a significant opportunity to further embed nutrition into their core business and to improve product offerings, making them healthier and more affordable for all consumers.

Actioning the Index recommendations is critical in the current national context and will allow major F&B manufacturers to play a more vital part in addressing pressing nutrition-related concerns and ensuring that a healthy, affordable diet is available to all. ATNI and its partners hope that the India Index 2023 provides useful data and analyses that support companies, investors, civil society and policymakers to make informed steps towards improving nutrition for all.



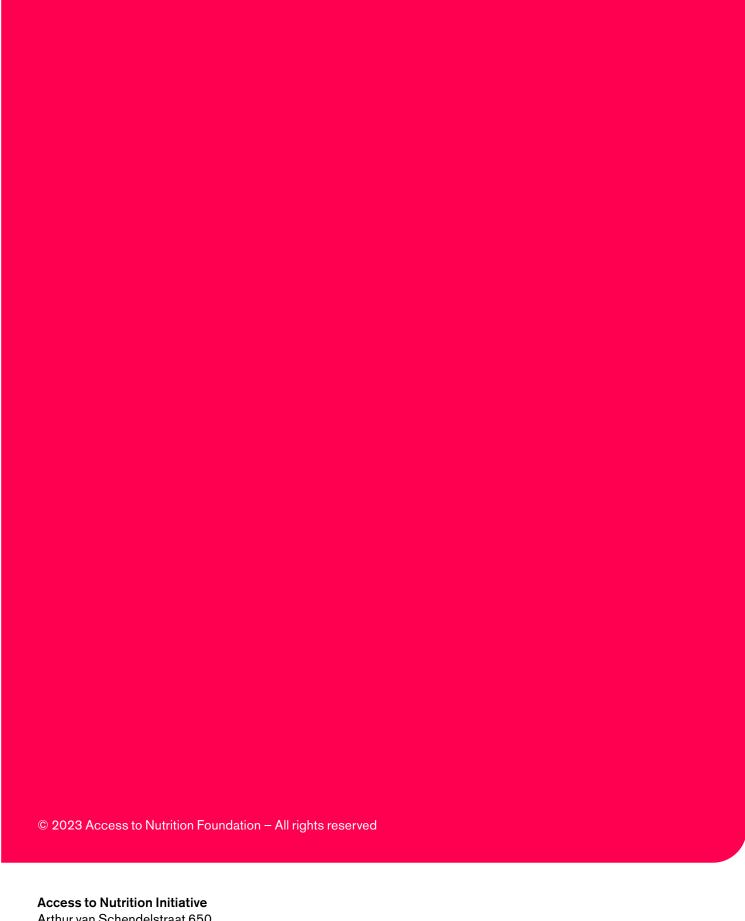


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