

ANTI-BRIBERY POLICY

ACCESS TO NUTRITION
FOUNDATION

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1. About the Access to Nutrition Foundation

ATNF is a global foundation actively challenging the food industry, investors, and policymakers to shape healthier food systems. We analyse and translate data into actionable insights, driving partnerships and innovations for market transformation, ensuring access to nutritious and sustainable food for all.

Since launching our first Global Index in 2013, ATNF has benchmarked the world's largest food and beverage manufacturers and worked with them to improve their performance to accelerate access to affordable, nutritious food, particularly for vulnerable populations.

Our goal is to ensure markets provide access to nutritious and affordable foods, so that by 2030, at least half of food and beverage companies' sales come from healthier products that contribute to healthy, sustainable diets for everyone, especially the most vulnerable in society. This is critical as nutritious, affordable diets support physical and mental development, build resilient societies, and reduce diet-related non-communicable diseases.

We produce high-quality research and accountability tools to drive market transformation. We publish global and country-specific indexes, conduct research to monitor industry action and understand food environment and support increased alignment around nutrition accountability tools. Based on our new theory of change, we increasingly leverage our research into catalysing market change through actions, partnerships, and research.

To maximise our impact, we tailor our work to meet the needs of responsible investors, policymakers, and consumer groups. We contribute to, and convene, key debates shaping the future of healthy diets. Building strong alliances and engaging stakeholders are central to our mission, as we continue to expand our network to share knowledge and promote access to nutritious food for all.

1.1 Access to Nutrition Foundation Mission

We improve market performance by driving key actors in the food system – starting with industry -- to accelerate access to affordable nutritious foods for all, especially vulnerable consumers, in a sustainable way.

We develop, deliver and translate data-driven tools and strategies that catalyse market change for nutrition.

2. Purpose of the Anti-Bribery Policy

At ATNF we are committed to conducting all our activities with integrity, transparency, and fairness. This Anti-Bribery Policy is designed to prevent bribery and corruption in all forms as we engage with stakeholders, including the food industry, investors, policymakers, and other partners. Our aim is to maintain the highest ethical standards in achieving our mission to combat global malnutrition.

This policy applies to all employees, board members, consultants, contractors, volunteers, and anyone acting on behalf of ATNF regardless of location. It governs all interactions with government officials, private sector partners, investors, and other stakeholders.

The general rule is that all ATNF Staff members, and all those acting for or on ATNF's behalf, are strictly prohibited from offering, paying, soliciting or accepting bribes or kickbacks, including facilitation

payments. Third parties, contractors, agents, representatives and intermediaries who act on behalf of ATNF, must comply with these anti-bribery provisions or a comparable Code of Conduct. This Anti-Bribery Policy applies to all ATNF Staff members.

3. Prohibition Against All Forms of Bribery

3.1. Bribery

In general, bribery means directly or indirectly offering, giving or receiving anything of value to influence the behavior of someone to act or not act, to do something illegal, or to secure an improper advantage, regardless of intent.

A bribe can take many forms, can be transmitted through third parties, and can be of any size. Examples include:

- Attempts to secure improper advantage in any area, for example in securing government authorizations, speeding up permits and applications, or other favorable treatment;
- Offers of any form of undue reward, not just money, including extravagant trips or entertainment or gifts of significant value;
- All means of channeling undue payments or other benefits, or for masking their purpose, whether as bribes, subcontracts, purchase orders, consultancy agreements, or through agents or other third parties;
- Staff members receiving something of value (either directly or indirectly) in return for giving an improper advantage to a third party; and
- Staff members receiving from a third party, either directly or indirectly, anything of more than a minimal value in connection with a transaction entered into by the ATNF.

3.2 Facilitation payments

Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government actions such as the provision of a visa, customs clearance, permit, license, work order, police protection, utility services, mail service, contract performance and actions of a similar nature. In some countries, it is widespread and may be considered normal practice to make such payments, but they are often nonetheless illegal under the OECD Convention, the Foreign Corrupt Practices Act and the UK Bribery Act 2010. Regardless of any pressure exerted by foreign officials requesting facilitation payments, ATNF will conduct business using only legal and ethical means.

4. Safeguards

ATNF Staff members are responsible for ensuring that ATNF's anti-bribery expectations are communicated to and followed by such people/entities, and that appropriate contractual protections and safeguards are in place where necessary.

5. Compliance with the policy

It is the responsibility of the Executive Director to ensure compliance with this policy. However, each of

ATNF Staff members has an obligation to act with integrity and to ensure that we understand and comply with this Policy. In addition, all Staff members will be required to confirm that they have understood and complied with the policy annually.

6. Whistleblowing

ATNF is committed to creating a safe environment where staff members and others can voice concerns or seek assistance with confidence. To support this, we have implemented a Whistleblower Policy. This policy encourages staff, board members, consultants, and other stakeholders to raise any serious concerns about the management of ATNF or the conduct of those involved. Our aim is to identify and address any malpractice or unlawful activity within the organization to ensure it is dealt with appropriately. For further information see our Whistleblower Policy.



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