

CONFLICT OF INTEREST POLICY

ACCESS TO NUTRITION FOUNDATION

November 2024

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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.

1.2 Purpose

The purpose of this Policy is to provide guidance in identifying and handling potential and actual conflicts of interest involving the ATNF. In most instances, conflicts of interest can be avoided by exercising good judgment. The ATNF relies on the sound judgment of its staff to prevent conflict situations.

1.3 Commitment to Integrity

ATNF is committed to the highest levels of integrity. Staff, Board members, consultants, and other stakeholders with a contractual relationship with ATNF are expected to conduct their relationships with each other, ATNF, and outside organizations with objectivity and honesty. The general rule is that ATNF staff must avoid and disclose ethical, legal, financial, or other conflicts of interest involving ATNF, and remove themselves from decision-making authority in any conflict situation involving ATNF.

1.4 Applicability

This Conflict of Interest Policy applies to all ATNF staff, Board members, Expert Group members, consultants, and other stakeholders with a contractual relationship with ATNF.

2. What constitutes a potential conflict of interest?

A conflict of interest occurs when an individual's personal, financial, or other interests could potentially interfere with their duties and responsibilities at ATNF. This includes situations where:

- Personal or financial interests may compromise, or appear to compromise, the individual's judgment or objectivity.
- Relationships with the food and beverage industry, including but not limited to food and beverage producers (such as breast milk suppliers), food retailers, and out-of-home establishments, may influence or give the appearance of influencing the outcome of research or advocacy activities.
- Relationships with governments could influence, or appear to influence, the outcome of research, advocacy activities, or policy recommendations related to ATNF's scope of activities.
- External activities, such as consulting, board memberships, or advisory roles, could conflict with the interests of ATNF.

2.1 Types of conflicts of interest

Conflicts of interest can arise in various forms, including but not limited to:

- Direct business interests: Holding a significant direct business interest in a company assessed by ATNF, including, but not limited to, employment (including contract work) or board membership within the past three years.
- Financial interests: ownership of stocks, bonds, or other financial instruments in food and beverage companies (excluding mutual funds or exchange-traded funds).
- Relationships with ATNF funders or donors: Relationships with funders or donors are permissible, but they must be disclosed to avoid any potential or perceived conflict of interest. Transparency is crucial to maintaining the integrity and independence of ATNF's work.
- Family members: Having a close family member (e.g., spouse, parent, child, spouse of a child, brother, sister, or spouse of a brother or sister) with such interests.
- Disclosure of confidential information: Providing ATNF's privileged or confidential information or advice to third parties, which can be used to decide on such purchase or sale.
- Gifts and hospitality: acceptance of gifts, favours, or hospitality from food and beverage companies that exceed nominal value, or that could influence or appear to influence decision-making. ATNF's Gift Policy provides further guidance.
- Financial compensation or favours: Receiving financial compensation or other favours from a company that is measured by ATNF to influence its performance on ATNF, or from a company that has its own conflict of interest. Financial compensation includes direct and indirect remuneration as well as gifts, meals or favours worth EUR 75 or more (or the equivalent in another currency).
- External activities: engaging in consultancy, advisory roles, or holding board positions with food and beverage companies.
- Intellectual property: holding patents, trademarks, or other intellectual property interests related to food and beverage products.
- Government relations: any direct or indirect relationships with governmental bodies that could influence, or appear to influence, the objectivity of our research, methodology, or advocacy efforts.
- Other Interests: Any other interests that the Board deems potentially conflicting.

3. Risks associated with conflicts of interest

Material conflict of interest: Any interest that could reasonably affect an individual's independence or impartiality.

- Impact of conflicts: material conflicts can lead to:
- Biases in measurements, monitoring, or reviews.
- Misuse of privileged information.
- Damage to the credibility and integrity of ATNF.
- Obligation to avoid conflicts: anyone influencing ATNF methodology, measurements, or publications—including Board members, staff, Expert Group members, consultants, and stakeholders—must avoid material conflicts with their personal, professional, or business interests.
- Industry expert involvement: to ensure quality and effectiveness, industry experts are involved in methodology development. However, those with active responsibilities in measured companies are excluded. Board members with ties to industry but not to companies we measure may be exempt if they can prove this beforehand. Retired officials or experts with limited advisory roles can participate indirectly. The Board evaluates and publishes their involvement and potential conflicts on the ATNF website.

4. Disclosure of conflicts of interest

- Transparency and disclosure: Clear criteria and full disclosure of (potential) conflicts of interest are crucial for maintaining the credibility of ATNF.
- Initial disclosure: upon joining ATNF, all employees, volunteers, Board members, and consultants must complete the Conflict of Interest Disclosure Form, detailing any potential conflicts, enclosed in this document.
- Ongoing disclosure: individuals must promptly disclose any new potential conflicts of interest as they arise by submitting an updated Conflict of Interest Disclosure Form.
- Annual review: all individuals covered by this policy are required to review and update their disclosure forms annually.

5. Management of conflicts of interest

1) Evaluation

The Audit Committee, appointed by the Board, will evaluate all disclosed conflicts of interest to determine their potential impact on ATNF's activities.

2) Mitigation

For conflicts that are deemed manageable, the Audit Committee will develop a conflict management plan. This may include:

- Recusal from decision-making processes related to the potential conflict.
- Divestment of financial interests.
- Limitation of the individual's role in specific projects.

3) Resolution

In cases where the conflict of interest cannot be adequately managed, the individual may be required to:

- Discontinue the conflicting activity.

- Resign from their position at ATNF.

4) Transparency and Accountability

To ensure transparency, ATNF will:

- Publish an annual public registry of disclosed conflicts of interest, along with the steps taken to manage them, accessible on our website.

5) Training and Awareness

ATNF will provide regular training to all employees, Board members, and consultants on the importance of identifying and managing conflicts of interest. Training will include:

- Definitions and examples of conflicts of interest.
- Procedures for disclosing and managing conflicts.
- The impact of conflicts of interest on the integrity of our work.

6) Enforcement

Failure to disclose a conflict of interest or to adhere to a conflict management plan may result in disciplinary action, up to and including termination of employment or affiliation with ATNF.

6. Review of policy

This Conflict of Interest Policy will be reviewed annually by the Audit Committee to ensure its continued relevance and effectiveness.

CONFLICT OF INTEREST DECLARATION FORM

To be completed and signed by the Board, staff, consultants and other stakeholders who have a contractual relationship with ATNF.

I have reviewed and understood the Conflict of Interest Policy of the Access to Nutrition Foundation and agree to abide by it; (This box must be checked by all.)

I have no potential conflict of interest as defined in the Conflict of Interest Policy of the Access to Nutrition Foundation; (This box must be checked by any person within the Access to Nutrition Foundation who has the means to directly influence our methodology or results.)

I report the following potentially conflicting interest(s), as defined in the Conflict of Interest Policy of the Access to Nutrition Foundation (please describe fully, including name and nature of the interest);

1. _____
2. _____
3. _____

List continues on ____ annex page(s).

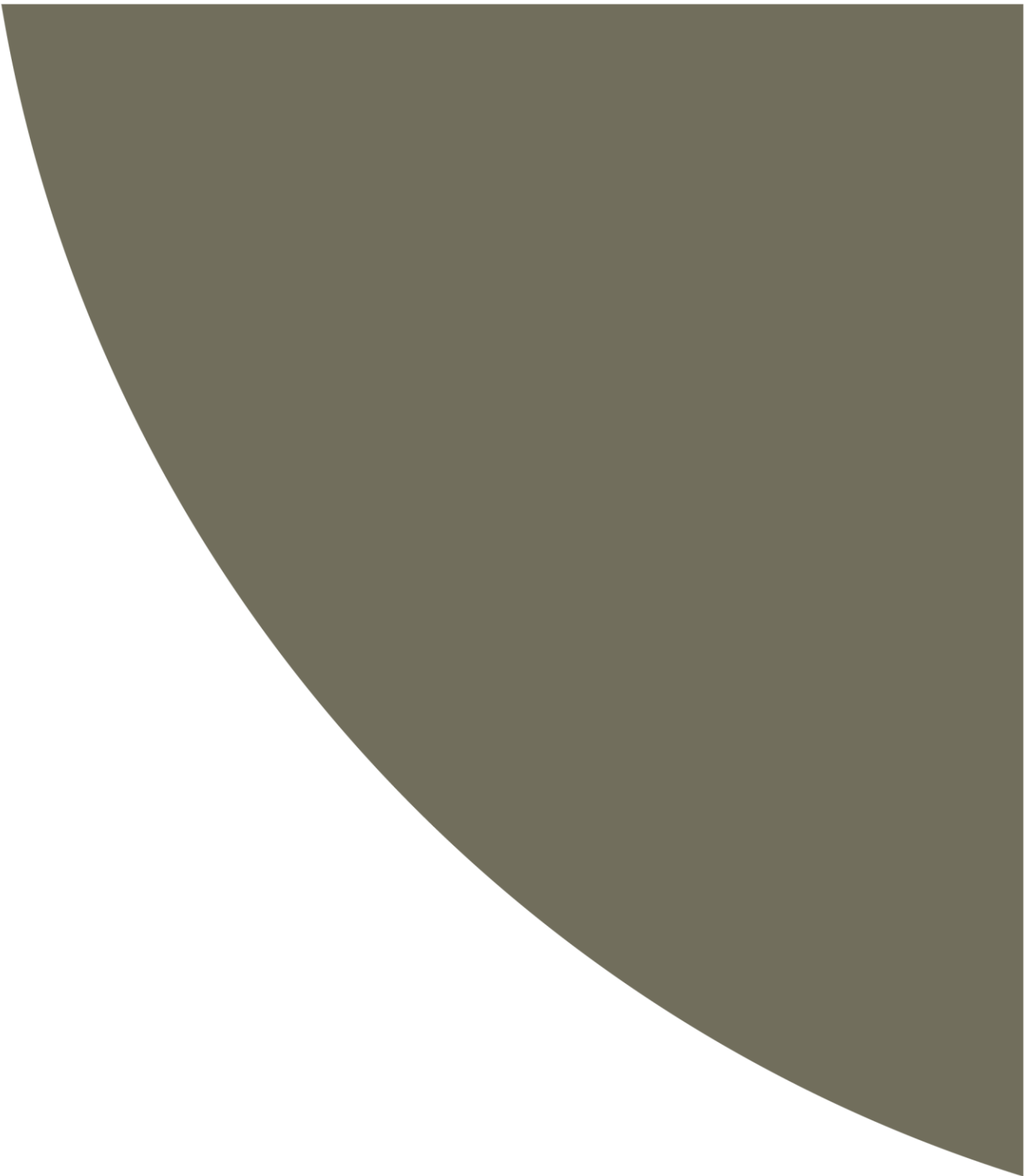
I hereby certify that the information provided is true and complete to the best of my knowledge; that I will adhere to decisions on conflicts of interest by the Board; and that I will report future changes to this information to the Board's Chairman within one month after they arise.

Name: _____

Position: _____

Signature: _____

City, Date: _____



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