

WHISTLEBLOWER POLICY

ACCESS TO NUTRITION
FOUNDATION

November 2024

Contents

1. About the Access to Nutrition Foundation	3
1.1 Access to Nutrition Foundation Mission	3
2. Purpose of Whistleblower Policy	3
3. General Principles	4
4. Reporting Responsibility	4
5. No Retaliation	4
6. Reporting Violations	4
7. Compliance Officer	5
8. Acting in Good Faith	5
9. Confidentiality	5
10. Handling of Reported Violations	5
11. Distribution of the Whistleblower Policy	5

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 Whistleblower Policy

The purpose of this policy is to encourage employees, board members, consultants and other stakeholders to raise any serious concerns they may have about the way in which the ATNF is run or about the conduct of those involved running it. ATNF wishes to find out if malpractice or unlawful activity exists within ATNF so that it can be dealt with appropriately.

The Whistleblower Policy applies to all ATNF Board members, employees, consultants and everyone with a working relationship with ATNF.

3. General Principles

The Code of Conduct and Ethics Policy ("Code") of the Access to Nutrition Foundation (the "Foundation") requires Board members, employees, consultants and other stakeholders who have a working relationship with ATNF to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ATNF, ATNF practices honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

4. Reporting Responsibility

It is the responsibility of all Board members and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy. Other stakeholders are also encouraged to report violations and suspected violations of the Code of Conduct & Ethics policy in accordance with this policy.

5. No Retaliation

No Board members, employees, consultants and other stakeholders who in good faith report any action or suspected action taken by or within ATNF that is illegal, fraudulent or in violation of the Code or any other adopted policy of ATNF shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within ATNF prior to seeking resolution outside ATNF.

6. Reporting Violations

The Code addresses ATNF's open door policy and suggests that all personnel, board members, consultants and other stakeholders share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. Supervisors are required to report any violation or suspected violation of law, the Code or any other adopted policy of ATNF to the Executive Director. If the issue is not resolved properly the supervisor will report to ATNF's board-appointed Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. In the case of any violation or suspected violation of law, the Code or any other adopted policy of ATNF, or if someone is not satisfied or uncomfortable with following ATNF's open door policy, ATNF's Compliance Officer should be contacted directly.

7. Compliance Officer

The Board appoints a Compliance Officer within the Board for a two-year term by voting. The Compliance Officer is responsible for administering this Whistleblower Policy and investigating and resolving all reported complaints. This includes clauses around safeguarding and allegations concerning any violation or suspected violation of law the Code or any other adopted policy of ATNF and, at his discretion, shall advise the chairman or the Executive Director. The Compliance Officer shall report to the Board.

There are two ways to contact the ATNF Compliance Officer, Mr. Frank Wagemans:

a) via email at fajwagemans@gmail.com or b) should you prefer your suspicion or grievance to remain anonymous, through an unsigned letter, C/o Compliance Officer, ATNF, Arthur van Schendelstraat 650, 3511 MJ Utrecht.

8. Acting in Good Faith

Anyone filing a complaint concerning any violation or suspected violation of law, the Code or any other adopted policy of ATNF must be acting in good faith and have reasonable grounds for believing the information disclosed indicates such a violation or suspected violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

9. Confidentiality

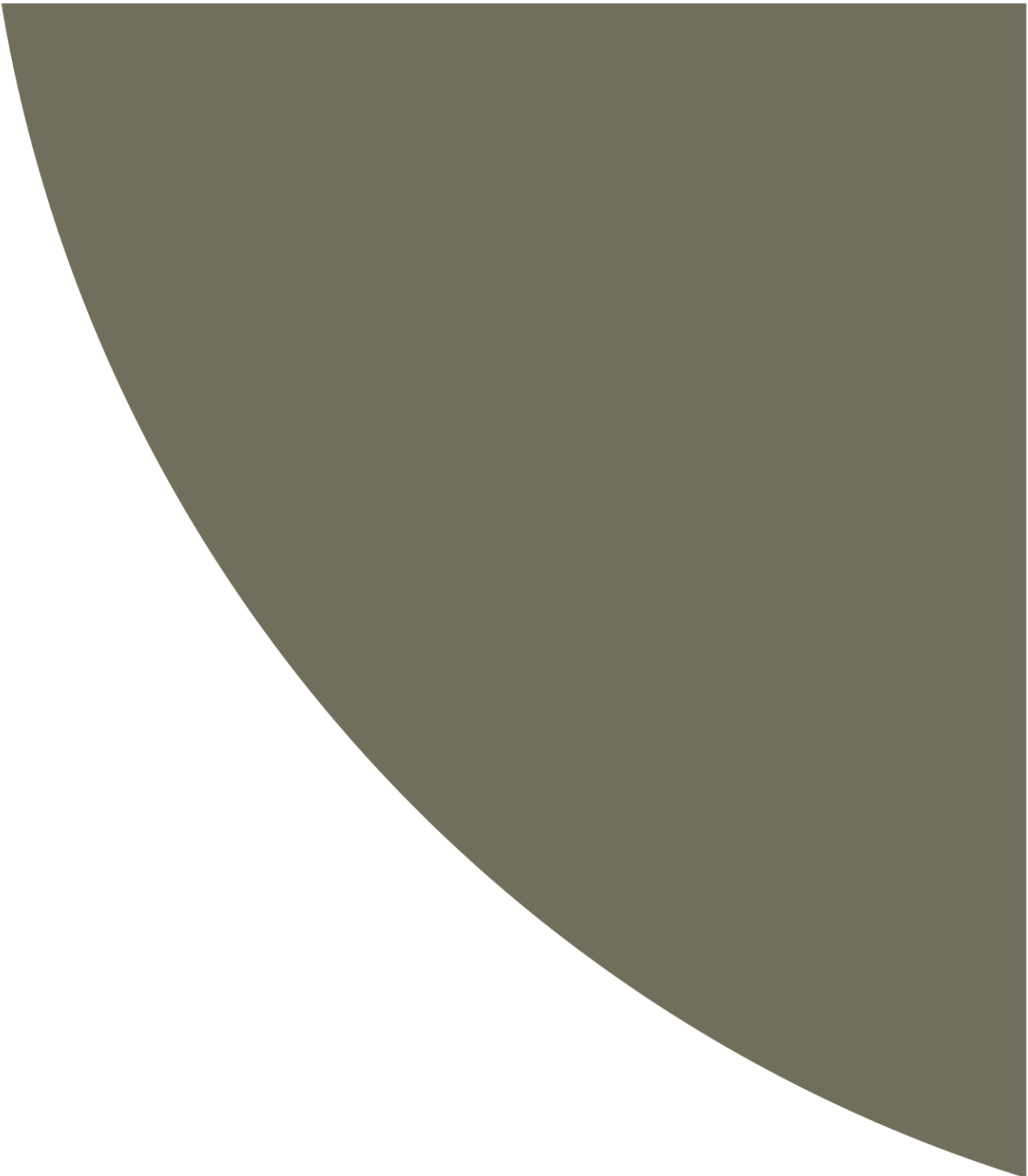
Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and comply with applicable law.

10. Handling of Reported Violations

The Compliance Officer shall notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

11. Distribution of the Whistleblower Policy

A copy of this Whistleblower Policy will be distributed to all staff & board members, consultants and other stakeholders who have a contractual relationship with ATNF. The Policy will be publicly available on ATNF's website.



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