

GIFT POLICY

ACCESS TO NUTRITION FOUNDATION

November 2024

Contents

1. About the Access to Nutrition Foundation	3
1.1 Access to Nutrition Foundation Mission	3
1.2 Key Guiding Principles	3
1.3 Key Operating Principles	4
2. Purpose	4
3. Scope	4
4. General Principles	4
5. Definition of Gifts and Hospitality	4
6. Acceptance of Gifts and Hospitality	5
7. Offering Gifts and Hospitality	5
8. Exceptions	5
9. Training and Awareness	5
10. Consequences of Non-Compliance	5
11. Policy review	6
12. Additional policies	6

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 maximize 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 Key Guiding Principles

The ATNF approaches its tasks and works with others based on the following guiding principles:

- **Not-for-profit:** ATNF acts for the public good and all funds are employed in the pursuit of its mission.
- **Independence:** independence of governance, funding and perspective are essential to the integrity and credibility of the ATNF and enables the realization of impartiality towards all stakeholders.
- **Transparency:** transparency of management, activities, methodology and findings supports public trust and accountability.
- **Respect:** respect for the mission of the ATNF aligns with respect for the process of fairly representing the collective view of society's expectations of F&B companies and respect for the views of all stakeholders.
- **Collaboration:** the ATNF collaborates with other organizations to avoid overlap and duplication

of effort, where there are shared values, common aims, and activities are for the good of society.

- **Affirmation:** through the ATNI, the ATNF acknowledges the positive progress and efforts of companies towards access to F&B practices.
- **Inclusivity:** the ATNF works from an inclusive perspective towards all belief, culture, gender, race, ethnicity, and national and regional considerations.
- **Human rights:** the ATNF respects universal human rights.

1.3 Key Operating Principles

ATNF key operating principles include:

- **Decision making:** is transparent, evidence-based and strategic, for the good of the entire organization. Everyone understands how and why decisions are made.
- **Staff:** ATNF strives to have the right number of Staff in the right positions at the right time; and every position has clear accountability, responsibility and authority. Technical and managerial expertise/functions do not have to reside in the same person.
- **Quality Standards:** ATNF is committed to establishing and meeting realistic high-quality standards for its projects, and to developing and implementing the monitoring and evaluation systems necessary to monitor and ensure these standards.
- **Respect for the law:** The ATNF is knowledgeable of and complies with all laws, regulations and applicable international conventions. Staff members must comply and abide by all applicable laws and regulations.

2. Purpose

The purpose of this Gift Policy is to establish guidelines for giving and receiving gifts, hospitality, and other benefits to and from external parties by employees, experts, consultants, contractors, board members and any other representatives of Access to Nutrition Foundation (ATNF).

3. Scope

This policy applies to all individuals associated with ATNF, including employees and any members of his/her immediate or extended family, consultants, contractors, board members and any other representatives acting on behalf of the organization.

4. General Principles

- All interactions with external parties must be conducted with integrity, transparency, and in compliance with applicable laws and regulations.
- No individual may offer, give, solicit, or accept any gift, hospitality, or benefit that could directly or indirectly influence decision-making or create the appearance of impropriety, either for ATNF or for themselves.
- Decisions regarding gifts or hospitality should be based solely on the best interests of ATNF and our mission.

5. Definition of Gifts and Hospitality

- Gifts: Any item of value, including but not limited to cash, goods, services, discounts, loans, entertainment, travel expenses, or any other benefit.
- Hospitality: Includes meals, accommodations, tickets to events, transportation, or any other expenses paid for by an external party

6. Acceptance of Gifts and Hospitality

- Gifts and entertainment paid for by Food & Beverage ('F&B') companies, F&B industry associations, manufacturers, BMS manufacturers, retailers, and general processors are strictly prohibited.
- Regardless of the monetary value, ATNF's employees must not accept gifts that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate laws, regulations, or policies of ATNF or its donors, or would cause embarrassment to or reflect negatively on ATNF's reputation.
- Gifts or hospitality exceeding €75 (or the comparable value in specific economic contexts) must be reported to the Executive Director for review and approval. If the Executive Director receives gifts or hospitality exceeding this value, it must be reported to the designated Compliance Officer for review and approval. Management will annually report any instances, including exceptions or cases of non-compliance, to the ATNF's Board Audit Committee.
- If a gift exceeds €75 and cultural sensitivities necessitate acceptance, the recipient should either share it with the office or donate it to charity.

7. Offering Gifts and Hospitality

- Regardless of the monetary value, ATNF's employees must not give gifts that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate laws, regulations, or policies of ATNF or its donors, or would cause embarrassment to or reflect negatively on ATNF's reputation.
- All offers of gifts or hospitality must be made transparently and in compliance with this policy.

8. Exceptions

- Modest gifts of nominal value, such as promotional items, may be accepted or offered if they are customary business courtesies and do not influence or appear to influence decision-making.
- Gifts or hospitality offered in cultural or diplomatic contexts may be accepted or offered, provided they are consistent with local customs and laws and do not compromise the integrity of ATNF.

9. Training and Awareness

- All employees, consultants, and representatives must receive training on this policy upon joining ATNF and participate in regular refresher courses.
- Awareness campaigns should be conducted to reinforce the importance of ethical conduct and compliance with the Gift Policy.

10. Consequences of Non-Compliance

- Violations of this policy may result in disciplinary action, up to and including termination of employment or engagement with ATNF.
- Employees found to have engaged in corrupt or unethical behaviour may be subject to legal action.

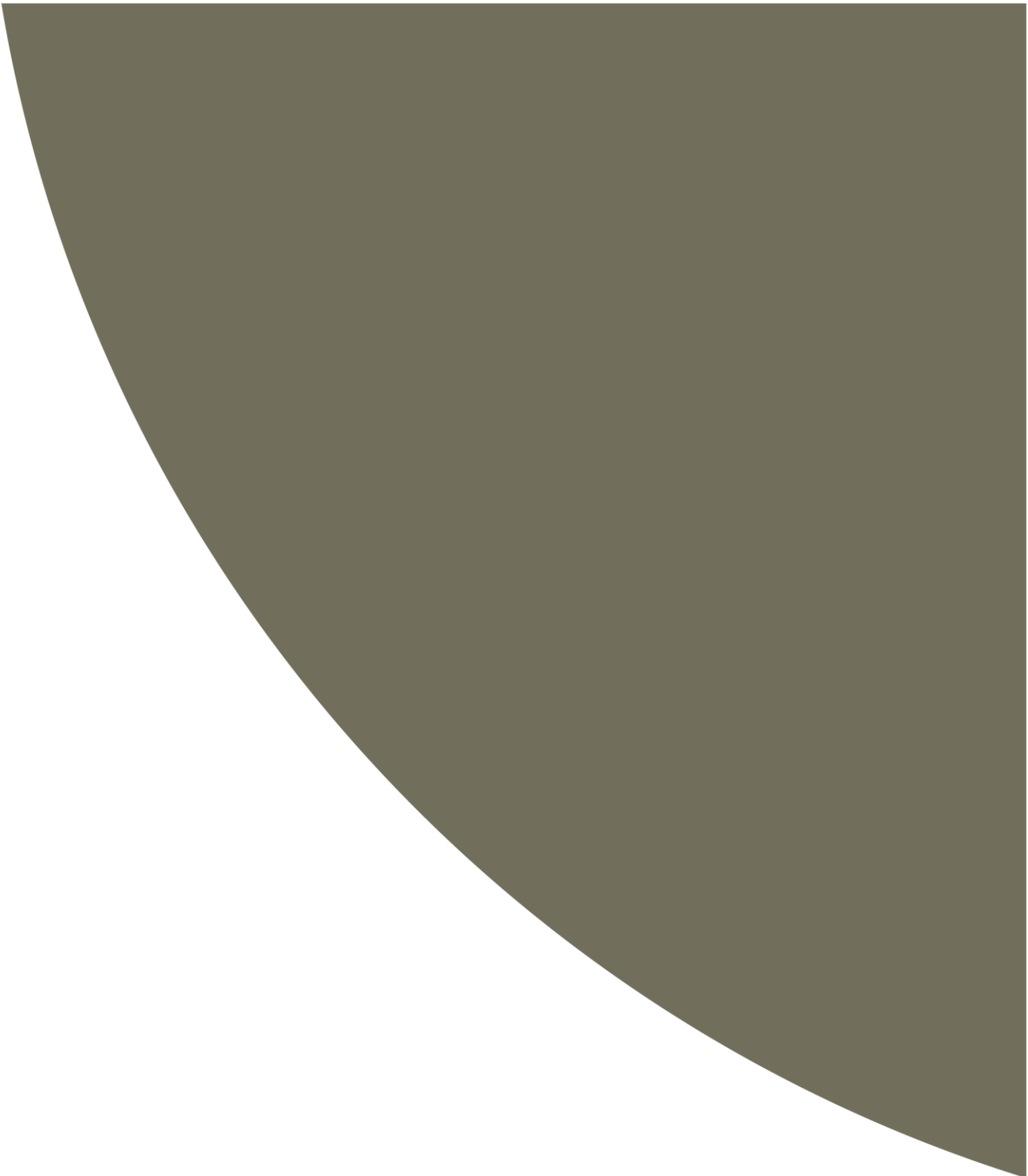
11. Policy review

- This Gift Policy will be reviewed once every two years by the designated Compliance Officer to ensure its effectiveness and relevance.
- Amendments to the policy may be made as necessary to address emerging risks or changes in laws and regulations.

12. Additional policies

- ATNF also has additional rules laid down in its Anti-Bribery policy, which is also applicable to all employees and individuals associated with ATNF.

By adhering to this Gift Policy, ATNF demonstrates its commitment to upholding the highest standards of integrity, transparency, and accountability in all aspects of its operations.



Access to Nutrition Foundation
Arthur van Schendelstraat 650
3511 MJ Utrecht
The Netherlands
+31 (0)642 95 16 55
info@accesstonutrition.org
www.accesstonutrition.org