



# Global Index 2024

## **Methodology**

November 2024

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## Abbreviations

ATNi	Access to Nutrition initiative	KPI	Key performance indicators
		LMICs	Low- and middle-income countries
BMI	Body mass index	LSFF	Large-scale food fortification
BMS	Breast-milk substitutes	LSM	Living Standards Measure
BoP	Bottom of the pyramid	MHI	Monthly household income
CEO	Chief Executive Officer	NCD	Non-communicable disease
CF	Complementary foods	NDA	Non-disclosure agreement
EMI	Euromonitor International	NPM	Nutrient profile model
ERM	Enterprise Risk Management	NPSC	Nutrient Profiling Scoring Criteria
ESG	Environmental, social, governance	PAHO	Pan American Health Organization
FAO	Food and Agriculture Organization	PHO	Partially hydrogenated oils
FOP	Front-of-pack labelling	QA	Quality assurance
FVNL	Fruits, vegetables, nuts, and legumes	QC	Quality control
FY	Financial year	RTD	Ready-to-drink
HFSS	High in fats, sugar, and salt	SDGs	Sustainable Development Goals
HSR	Health Star Rating system	SKU	Stock-keeping unit
		SOP	Standard Operating Procedure
		TFA	Trans-fatty acids
		TGI	The George Institute
ICC	International Chamber of Commerce	UK	United Kingdom
IFBA	International Food & Beverage Alliance	USD	US Dollars
ILO	International Labor Organization	WNA	Workforce Nutrition Alliance
iTFA	Industrially-produced trans fatty acids	WHO	World Health Organization

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# 1. Executive summary

ATNi (Access to Nutrition initiative) is a global foundation that actively challenges 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 so that all people have access to nutritious and sustainable food.

In this fifth iteration of the Global Index, ATNi assesses 30 of the world's largest food and beverage manufacturers, seven of which for the first time, and measures the nutritional quality of their product portfolios in 25 global markets. In addition, the Global Index assesses companies' policies, practices, and transparency on a range of key topics relating to nutrition and their impact on consumers' diets (Table 1), and the extent to which they align with the best internationally recognised guidance and standards currently available. Only companies' efforts relating to their commercial business (rather than philanthropy, etc.), that go beyond regulatory requirements, are taken into consideration.

**Company selection:** The largest companies were selected based on their global retail sales of food and non-alcoholic beverages, using sales estimates from Euromonitor International Passport data for the financial year (FY) 2022. Priority was further given to those with wider geographic coverage, including low- and middle-income countries (LMIC) presence, and portfolio relevance.

## Methodology revision and streamlining:

The methodology has been revised significantly since the Global Index 2021, with a substantially reduced set of indicators focused on priority topics that are considered key for industry transformation. This process was informed by analysis of and lessons learned from previous ATNi Indexes; an exit survey and cognitive interviews with company representatives following the Global Index 2021; one-on-one consultations with relevant stakeholders and experts (including the ATNi Expert Group); latest reports, studies, and insights on both the global nutrition and food industry context; latest national and international (voluntary) guidance from authoritative public health bodies, such as governments and the World Health Organization (WHO); and ATNi's 2023-2027 strategy.

Following this process, the number of indicators was reduced from a total of 156 to 51, the structure simplified, and category weightings adjusted. The scope of topics assessed has been narrowed slightly to focus on those which have the highest priority for stakeholders, research validity, and opportunity for impact.

A full list of indicators used for the Global Index 2024 can be found in Appendix II.

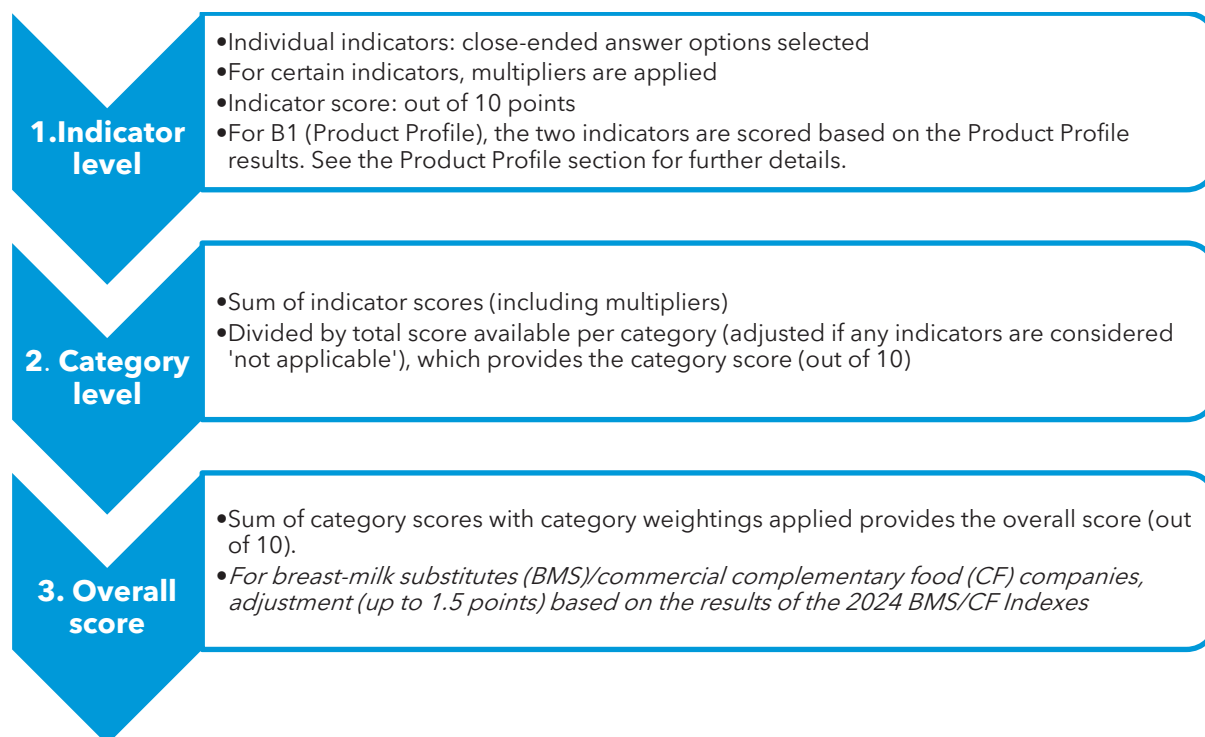
**Product Profile:** In Category B1 (Product Profile), ATNi uses the Health Star Rating (HSR) nutrient profile model (NPM) to assess the healthiness of food and beverage manufacturers' product portfolios with direct relevance for people's diets. The independent performance measurement of the sales from healthier products and mean HSR constitutes 30% of the overall Index Score weight. Other NPMs are also applied to obtain information, but not used for the overall Global Index

TABLE 1  
OVERVIEW OF INDICATOR  
CATEGORIES AND THEIR RELATIVE  
WEIGHTINGS

Category weighting	2021 weighting	2024	No. of indicators
A. Nutrition Governance	12.5%	15%	7
B1. Product Profile	20%	30%	2
B2. Portfolio Improvement	7,5%	10%	12 +4 unscored
B3. NPMs for Reporting	7,5%	5%	4
C. Affordable Nutrition	15%	15%	6
D. Responsible Marketing	20%	15%	7
E. Workforce Nutrition	2.5%	5%	6
F. Responsible Labelling	10%	5%	3

scoring and ranking: the WHO European NPM, to assess whether products are eligible to be marketed to children; Nutri-Score; and the UK NPM.

### Scoring approach:



**Research process:** Companies are first provided access to the full survey in an online data gathering platform and are invited to submit evidence – which is both publicly available and not in the public domain – relating to each indicator. This is reviewed by ATNi researchers, with one researcher assigned per category, to make a preliminary assessment. For non-engaging companies, the researchers check for information available on the companies' public domains.

Companies review the preliminary assessments and are given a second opportunity to submit evidence and provide further explanation. ATNi researchers then assess whether this is sufficient to change the score. For quality assurance and to check consistency, all assessments are reviewed by another researcher, and further checks are carried out by the research lead and senior research team.

### Limitations:

- **The trade-off between aligning with new developments and providing comparability over time.** Given the extent of the methodology revision for this Index, comparability with the previous Index in terms of scoring is limited, and direct comparisons in scores are not encouraged. Where possible, ATNi has sought to highlight companies' developments since the 2021 index on an indicator-by-indicator basis through qualitative analysis.
- **The index uses the same framework to assess a range of companies with very different features.** The companies assessed in this index vary considerably in terms of portfolio types, size, market presence, ownership structure, regulatory contexts, and cultural context. Some indicators will naturally have greater or lesser applicability to certain companies than others. ATNi has sought to manage this by including the option to make certain indicators 'Not applicable' for certain companies, although it is not always black-and-white, and doing so can give that company a slight scoring advantage.

- **A substantial part of the index assesses companies' commitments and self-reported performance, without independent verification**, since it is not feasible to perform independent, on-the-ground assessments of companies' practices across all topics. It also is assumed that all publicly reported and privately disclosed data is accurate, although for many indicators ATNi requires companies to provide evidence of performance.
- **The true performance of non-engaging companies, or companies with limited engagement, may not be fully captured.** The results of the Index therefore may not provide a full representation of the companies' nutrition-related activities. However, it is worth noting that 25 of the 30 companies engaged during this iteration. Time constraints may also limit the amount of evidence that companies can share.
- **The research does not capture all corporate activities that may also have an indirect but significant impact on public health**, including: 1) environmental sustainability; 2) corporate tax avoidance practices; 3) corporate wealth and income distribution; and 4) country-specific food lobbying practices.
- **Product Profile:** For a full explanation of the limitations for the Product Profile assessment, please refer to the full [Product Profile report](#).



## 2. About the Access to Nutrition initiative

ATNi is a global foundation actively that challenges the food industry, investors, and policymakers to shape healthier food systems. Its mission is to transform markets so that, by 2030, at least half of companies' food and beverage sales are derived from healthy products.

We analyse and translate data into actionable insights, driving partnerships and innovations for market transformation so that all people have access to nutritious and sustainable food. With its tools, partnerships, and policy work, the organisation wants to shine a light on nutrition-related corporate practice, policy, and food products, and have its data and analyses used by responsible investors, policymakers, civil society organisations, and industry leadership.

As of November 2024, ATNi's work is supported by over 88 institutional investors that manage over USD 21 trillion assets under management. They use ATNi's research in their investment research and engagements with companies in which they are shareholders, to encourage improved performance on nutrition to contribute to long-term shareholder value. Some of these investors are ready to stop investing in companies that predominantly produce unhealthier food and beverage products. We believe this is an important extra lever and pathway for change. More information on ATNi's Investor Expectations on Nutrition, Diets, and Health can be found [here](#).

To preserve its independence, ATNi does not accept funding from companies it assesses or the wider food and beverage industry. It is overseen by an independent unpaid board and is funded, among others, by the Bill & Melinda Gates Foundation and the UK Foreign, Commonwealth and Development Office. More information about ATNi's governance and operating policies is available [online](#).

All of the ATNi Indexes follow a set of [key design principles](#) that were formulated when the organisation was established in 2013. ATNi's work on the Global Index 2024 is guided by ATNi's [Theory of Change](#), stakeholder engagement, input from ATNi's Expert Group, and guidance from its board members.

### The Global Index 2024: Aim, development, and process

In 2024, the world continues to face a triple burden of malnutrition. The latest State of Food Security and Nutrition in the World 2024 report shows that globally, over a third of people (about 2.8 billion) cannot afford a healthy diet – up to 52.6% of the population in LMICs – and that 582 million people will be chronically undernourished by 2030. Simultaneously, adult obesity has risen sharply over the last decade, growing from 12.1% in 2012 to 15.8% in 2022.<sup>1</sup> These alarming figures are attributed, in part, to changes in the global food environment, which has seen consistent growth in the retail and consumption of processed foods in recent decades, particularly in LMICs. The food industry and its investors have an opportunity to contribute to healthy diets and improved food environments. Find the full context chapter for the Global Index 2024 [here](#).

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<sup>1</sup> Food and Agricultural Organization, International Fund for Agricultural Development, United Nations Children's Fund, World Food Programme, and World Health Organization (2024) *The State of Food Security and Nutrition in the World*, Rome: Food and Agricultural Organization. Available at: <https://openknowledge.fao.org/server/api/core/bitstreams/06e0ef30-24e0-4c37-887a-8caf5a641616/content> (Accessed: 06/11/2024).

ATNi published the fifth iteration of the Global Access to Nutrition Index on 7 November 2024. The Global Index 2024 aims to measure and transform a substantial part of the global food market, assessing the extent to which the food and beverage industry's commercial nutrition-related policies and practices go beyond regulatory requirements and align with the best international guidance and standards available. It aims to capture the current state of play and measure relative progress, highlight priority areas for improvement, and provide a roadmap for change for the wider food and beverage industry.

The Global Index 2024 provides insights and data on the food industry's nutrition policies and commitments, as well as performance metrics, including the healthiness of food products and data on micronutrients in packaged food products. It also builds on previous iterations by highlighting changes over time in food industry policies and practices.

The Indexes that ATNi publishes are modelled primarily on benchmarks developed for or used by the investment and finance community. ATNi's purpose is to develop and deliver tools that:

- Track the relative contribution of the food and beverage industry in addressing the global nutrition challenges of overweight and obesity, undernutrition, micronutrient deficiencies, and all diet-related diseases;
- Are used by food systems stakeholders to hold companies to account for delivering on commitments to tackle these challenges;
- To provide specific recommendations for companies on how they can improve, highlight positive and negative developments, and identify their best practices on nutrition-related topics that other companies can emulate.

The ultimate aim is to encourage these companies and the wider sector to do as much as they can to improve the diets of adults and children around the world.

## The Global Index 2024: Key elements

### **The Corporate Profile**

Companies' policies, practices, and disclosures related to their commercial activities in promoting good nutrition for all – i.e., preventing and tackling overweight, obesity, and diet-related diseases; undernutrition; and micronutrient deficiencies – are assessed using the Corporate Profile methodology.

Scores from the Corporate Profile form one of two of the main outputs of the ATNi Indexes. They reflect companies' policies, practices, and disclosures relating to:

- Developing clear and cohesive strategies to address nutrition through their commercial operations, report on their progress, and formalise this through robust governance mechanisms;
- Improving the nutritional quality of their product portfolios;
- Improving their pricing of healthy products;
- Marketing their products responsibly, especially to children;
- Supporting their employees to achieve a healthy diet and support breastfeeding mothers;
- Labelling their products effectively to help consumers choose healthy options.

In 2018, the Product Profile was added to the Global Index for the first time and has now been integrated into the Corporate Profile methodology.

The basic structure of the 2024 methodology has been slightly modified from the 2013, 2016, and 2018 Global Indexes, and is organised into categories and indicators:

- Categories: ATNi's thematic areas that capture companies' nutrition-related practices and efforts are assessed in the six categories (A-F);
- Indicators: 51 in total:
  - 43 scored between 0-10
  - 2 calculated based on the result of the Product Profile
  - 3 scored between 0-1, which acts as a multiplier for other specific indicators
  - 3 unscored (for information purposes only).

The complete survey, including all indicators, is presented in Appendix II.

## The Product Profile

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios in several markets. It is undertaken by analysing ingredients and levels of fat, salt, sugar, fruit, vegetables, and other components within individual products.

The Product Profile methodology was initially developed in partnership with Mike Rayner, a professor at the University of Oxford (and member of ATNi's Expert Group), and the Food Policy Division of The George Institute (TGI) for Global Health. A detailed description of the methodology, as applied to the Global Index 2024, can be accessed [here](#).

To determine products' nutritional quality, ATNi uses NPMs that meet qualitative criteria as defined by ATNi's Expert Group. According to these criteria, an NPM should:

- Be developed with appropriate stakeholder consultation;
- Cover the majority of categories of processed food and beverage products;
- Take into account both positive and negative nutrients;
- Not have been designed solely to guide school feeding programs, but foods in the general market;
- Be well-validated, with results published in peer-reviewed literature demonstrating that it produces internally consistent classifications of 'healthy' and 'unhealthy' foods, and align with general nutrition principles;
- Enable differentiation of nutritional quality within and between categories;
- Be available in the public domain, including the scoring algorithm,;
- Be able to generate meaningful results across all countries.

For the Global Index 2024, ATNi used four NPMs that meet these criteria:

**The Health Star Rating (HSR)** is a front-of-pack (FOP) interpretive nutrition labelling system designed to assist consumers in making healthier choices. The underlying NPM assesses risk nutrients (overall energy, sodium, total sugar, saturated fat) and positive food components (fruit and vegetable content, protein, fibre, and in some cases, calcium) to score products on the basis of nutritional composition per 100g or 100mL across one of six categories. These scores are then converted to a rating ranging from 0.5 to 5 stars. The model's development was led by the Australian government - in collaboration with industry, public health, and consumer groups - and builds upon the Nutrient Profiling Scoring

Criteria (NPSC) previously created by the Australian and New Zealand governments to regulate health claims.<sup>2</sup> The NPSC itself was developed from the United Kingdom's Nutrient Profiling Model (originally developed for use by OfCom). The HSR has been implemented in Australia since June 2014 on a voluntary basis, and has also been adopted in New Zealand. Further detailed information is available [online](#).<sup>3</sup> Of note is that, in 2020, an update to the algorithm underpinning the HSR was released, modifying the scores that some products were able to receive. For the Global Index 2024 Product Profile, the most current HSR algorithm was used. Based on Australian research, any product that scores 3.5 or above is considered by ATNi to be healthy. The Index results provide an analysis of the healthiness of the companies' overall product portfolios and products at category level. The Product Profile results at portfolio level use the HSR model to calculate a mean sales weighted average score, and the percentage of estimated sales from 'healthier' products (that reach a minimum HSR score of 3.5 stars are integrated into the Corporate Profile algorithm to create overall scores and ranking for the Global Index.

**The WHO European Model** is an NPM for use and adaptation by member states of the WHO European Region when developing policies to restrict food marketing to children. The model first requires foods to be allocated to one of 20 categories. Products are then checked against category-specific compositional thresholds for nutrients and other food components. If marketing is to be permitted, a product must not exceed (on a per 100g/mL basis) any of the relevant thresholds for that product category. Results under this model are simply expressed on a binary basis; i.e., 'marketing permitted' or 'marketing not permitted'. Although originally developed in Europe, the model is being adapted for other WHO regions. In the absence of standardised regulation on responsible marketing, the model was selected as a reasonable basis by which to determine products' suitability to be marketed to children, in all countries included in the analysis. The second edition of the WHO European model was used for analysis in this report. While the analysis outcomes regarding companies' products' suitability to market to children (according to this models) are presented, the results are not included in the Global Index scoring algorithm.

**Nutri-Score** is an FOP labelling NPM that provides an overall rating on the nutritional quality of food and beverages, using five colours to classify food products into five categories: from category A (dark green), indicating higher nutritional quality, to category E (dark orange), indicating lower nutritional quality. This rating system was developed to help guide consumers towards healthier food choices and thus prevent a wide range of nutrition-related chronic diseases. The score for a given food or beverage is calculated by allocating points for the content per 100g (or per 100mL for beverages) of energy, saturated fat, total sugars, sodium, dietary fibre, protein, and fruits, vegetables, and legumes. In 2023, an update to the original Nutri-Score algorithm was released. This most recent algorithm was used for analysis in the 2024 Global Product Profile, but the results are not included in the Global Index scoring algorithm.

**UK Nutrient Profile Model (NPM)** was developed by the Food Standards Agency in 2004-2005 as a tool to help the UK regulator for communications services (Ofcom) differentiate foods and improve the balance of television advertising to children. In the UK NPM, points are allocated for 'negative' nutrients (i.e., energy, saturated fat, total sugars, and sodium), which are then adjusted according to points obtained from 'positive' nutritional elements (such as the proportion of fruits/vegetables/nuts, fibre, and protein). Products meeting a score of <4 for foods and <1 for drinks are deemed more nutritious options. In 2018, an update to the model was developed but not formally agreed. While the 2004/2005 algorithm was used for Global Index 2024 analysis and reporting, the results are not included in the Global Index scoring algorithm.

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<sup>2</sup> See Australia New Zealand Food Standards Code, Standard 1.2.7

<sup>3</sup> Department of Health, Australian Health Star Rating website: <http://healthstarrating.gov.au>

ATNi worked with an independent organization, TGI, to execute the nutrient profiling element of the Product Profile.

For each company, up to 12 markets were selected to assess the nutritional quality of their portfolios and products at category level. For this Index, ATNi intentionally included a combination of markets in high-income countries as well as LMICs. The ambition was to cover at least 50% of a company's global sales, but to also include at least five LMICs.

To select the packaged foods and beverages for analysis, ATNI identified a maximum of five best-selling product categories for each company in selected markets, based on their estimated retail sales using Euromonitor International 2022 sales estimates. Nutrition information for more than 52,000 packaged food and beverage products, sold by 30 of the world's largest companies, was gathered to be included in the Product Profile assessment. The combined sales of these companies' products accounted for an estimated 20-25% of all packaged food and beverage sales worldwide.

The Product Profile captures the majority of the 2022 estimated retail sales for most companies. For all companies, the selection of markets includes countries from different regions and, in most cases (except Lotte and Nestlé), their home market.

After selecting the top five product categories in the scope of this assessment, for each company and for each of the selected markets, all products in these categories were assessed using the HSR.

For a full explanation of the methodology used for the Product Profile assessment, please refer to the full [Product Profile Report](#).

## 2.1 Company selection

The Global Index 2024 assesses 30 of the world's largest food and beverage manufacturers, selected based on their global retail sales of food and non-alcoholic beverages (as defined per the 'Product Scope' section, below) according to sales estimates from Euromonitor International Passport data for FY 2022 (see Table 2). Further criteria for company selection include:

- **Geographic coverage:** covering more than one market (less than 95% of sales in one market). Exceptions were made for Yili and Mengniu, given their size and inclusion in the previous Global Index.
- **Portfolio relevance:** companies with applicable portfolios (as defined in the 'Product Scope' section, below), but with limited portfolio diversity – primarily focused on very niche products that tend not to be part of typical diets, such as energy drinks or luxury confectionery – were excluded.

This Index incorporates 23 of the companies included in the Global Index 2021. Two companies assessed in 2021, BRF and Tingyi, did not meet the selection criteria for this Index.

Seven companies are new to the assessment in 2024: Barilla, Flora Food,<sup>4</sup> Hershey, Hormel, Indofood, Lotte, and Nissin. Kellanova was previously assessed as Kellogg, but the name was

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<sup>4</sup> Until September 2024, the company was formally known as 'Upfield'. A name change was announced on September 17th 2024 to 'Flora Food Group': "The name change will take effect immediately at the Dutch corporate level, with a phased

changed as part of the separation between its global business and its North American breakfast cereal business in 2023.<sup>5</sup>

At the time of the research, 23 of the 30 companies were publicly listed. Barilla, Ferrero, Lactalis, Mars, and Flora Food are privately held, while Arla and FrieslandCampina are cooperatives. Following the publication of this research, Kellanova is set to be acquired by Mars.

Based on Euromonitor sales data, ATNi estimates that the 30 companies assessed in the Global Index 2024 constitute 23% of the global packaged food and non-alcoholic beverage market share, with combined revenues in 2022 of around USD 3.5 trillion (excluding out of scope products, as listed below).

**Table 2. Global Index 2024 list of companies**

Company	Headquarters	Ownership
1. Ajinomoto	Japan	Public
2. Arla	Denmark	Cooperative
3. Barilla*	Italy	Private
4. Campbell	USA	Public
5. Coca-Cola	USA	Public
6. Conagra	USA	Public
7. Danone	France	Public
8. Ferrero	Italy	Private
9. Flora Food*	The Netherlands	Private
10. FrieslandCampina	The Netherlands	Cooperative
11. General Mills	USA	Public
12. Grupo Bimbo	Mexico	Public
13. Hershey*	USA	Public
14. Hormel*	USA	Public
15. Indofood*	Indonesia	Public
16. Kellanova	USA	Public
17. KDP	USA	Public
18. Kraft Heinz	USA	Public
19. Lactalis	France	Private
20. Lotte*	South Korea	Public
21. Mars	USA	Private
22. Meiji	Japan	Public

approach across Flora Food Group's global markets in the months ahead." <https://www.florafoodgroup.com/stories/press-and-media/upfield-renamed-as-flora-food-group> (accessed Nov 6th 2024)

<sup>5</sup> Kellanova (2023) Kellanova, formerly Kellogg company, announces completion of the separation of its North American cereal business [Press release] Available at: <https://investor.kellanova.com/news-events/news-details/2023/KELLANOVA-FORMERLY-KELLOGG-COMPANY-ANNOUNCES-COMPLETION-OF-THE-SEPARATION-OF-ITS-NORTH-AMERICAN-CEREAL-BUSINESS/default.aspx> (Accessed: Nov 6th 2024).

23. Mengniu	China	Public
24. Mondelez	USA	Public
25. Nestlé	Switzerland	Public
26. Nissin*	Japan	Public
27. PepsiCo	USA	Public
28. Suntory	Japan	Public
29. Unilever	UK/The Netherlands	Public
30. Yili Group	China	Public

\* Companies not assessed in the 2021 Global Index.

## 2.2 Product scope

To ensure that its focus is on improving overall diets, the Global Index 2024 – as with all other ATNi Indexes – assesses all food and (non-alcoholic) beverage products (and actions relating to them) sold by the companies, including product categories, as used by Euromonitor International’s food and beverage categorisation system:

Overarching categories: Cooking Ingredients and Meals; Dairy Products and Alternatives; Hot Drinks; Meals and Soups; Snacks; Soft Drinks; and Staple Foods.

Subcategories: Baked Goods; Bottled Water; Breakfast Cereals; Carbonates; Concentrates; Confectionery; Dairy; Edible Oils; Energy Drinks; Food Kits; Ice Cream; Instant Coffee Mixes; Juice; Meat and Seafood Substitutes; Other Hot Drinks; Pizza; Plant-based Dairy; Processed Fruit and Vegetables; Processed Meat and Seafood; Ready Meals; Rice, Pasta, and Noodles; Ready-to-Drink (RTD) Coffee; RTD Tea; Sauces, Dips, and Condiments; Savoury Snacks; Soup; Sports Drinks; Sweet Biscuits, Snack Bars, and Fruit Snacks; and Sweet Spreads.

The following exceptions, which are out of the scope of this assessment, should also be noted:

- Products with inherently low or insignificant nutritional contribution, or that are generally not required to carry a nutrition facts label, such as:
  - Plain tea and coffee (i.e., without added sugar, cream, or milk);
  - Herbs and spices.
- Specialised nutrition (i.e., not consumed by the general population, not part of a regular diet):
  - Baby foods, including infant formula and complimentary foods for infants up to 36 months old;
  - Vitamin and mineral supplements;
  - Sports nutrition;
  - Dietary/therapeutic feeding;
  - Products that are a part of a formal weight management programme, as there is currently no international consensus on the appropriate nutritional standards for such products.

## 2.3 Methodology revision process

Between May 2023 and January 2024, ATNi undertook an extensive revision process for the Global Index, with the aim of substantially streamlining and validating the methodology. This followed the results of an evaluation of the Global Index 2021 research methodology (see Box 1), and a recognition of the potential to drive greater impact through a narrower, more focused set of priority indicators. As a result, the number of indicators was reduced from 99 (156, counting sub-indicators) in 2021, to 51 indicators in 2024.

Adaptations were made based on the following inputs:

- Analysis of, and lessons learned from, previous ATNi Indexes;
- ATNi's 2023-2027 strategy;
- One-on-one consultations with relevant stakeholders and experts (including the ATNi Expert Group (see Appendix I));
- Latest reports, studies, and insights on the global nutrition and food industry contexts;
- Relevant regulations introduced in different markets over the last three years;
- Latest national and international (voluntary) guidance from authoritative public health bodies, such as governments and WHO.

### **Box 1: Evaluation of ATNi's research methodology and process**

Following the publication of the Global Index 2021, ATNi conducted an evaluation study to explore how it could improve understanding among companies and other users of indicators and Index processes, while maintaining its research integrity. The evaluation included an exit survey sent to all Global Index companies, to request their feedback on the process and rationale of key themes in the Global Index methodology.

Furthermore, ATNi undertook cognitive interviews with company representatives to assess their understanding of key indicators and made sure companies have a comprehensive awareness of what is being measured in the different Index topic areas. A cognitive interview is a one-on-one activity during which the participant shares her/his interpretation of a survey question. The goal is to ensure that a survey question measures the intended concept while also making sense to the participant. Notes are taken and thematically organised to understand if and how to revise a survey question.

The following summarises the key outcomes and recommendations from the study, which ATNi took into account in developing the Global Index 2024:

- Simplify answer options and reduce number of indicators;
- Clarify and simplify definitions, such as that of 'priority populations';
- Include more information about the rationale of indicators, and guide companies to find supplemental information;
- Place more emphasis on target setting and progress reporting against nutrition commitments.



## 2.4 Notable changes in the Global Index 2024

As a result of the methodology revision process, a range of notable changes have been made to the methodology in terms of structure, category weightings, and indicators.

### Key category-level changes:

- **Category 'Criteria' (sub-categories) merged.** To simplify the structure and scoring approach, sharpen the focus of each category, and avoid duplication of indicators, all 'criteria' (sub-categories) of each category were merged into single categories. The exception was formerly 'Category B', which is now treated as three separate categories: B1 (Product Profile), B2 (Portfolio Improvement), and B3 (NPMs for reporting).
- **Consumer nutrition education (Category E3) removed.** It was decided that Category E would focus exclusively on workforce nutrition and align with the four pillars of the Workforce Nutrition Alliance (healthy food at work, nutrition education, nutrition-focused health-checks, and support for breastfeeding mothers). Moreover, it was determined that, due to the risk of conflict of interest, companies should not be credited for their efforts to educate consumers on nutrition.
- **Category G ('Engagement') removed:**
  - Engagement with policymakers (G1). This topic was removed following acknowledgement of limitations in assessing companies' lobbying policies through a narrow set of indicators (the ATNi 2022 Spotlight on Lobbying, for example, used over 50 indicators), as well as the lack of capacity and standardised methodology, at the time of research, to assess companies' lobbying performance.
  - Stakeholder engagement (G2). This topic was removed due to acknowledgement of the difficulties in assessing the actual quality of companies' stakeholder engagement, the complexity of managing conflicts of interest and transparency around such engagements, and assessing the extent to which such engagement translates into real impact. Instead, it was determined that the outcomes of such engagements would be reflected by improved scores throughout the Index.
- **Category weightings adjusted.** As a result of the removal of these elements, and due to ATNi's increased strategic focus on the independent assessment of the healthiness of companies' products, the Product Profile (B1) weighting was increased from 20% to 30%. Other category weightings have been adjusted slightly based on stakeholder consultations, with the final weightings presented in Table 3.

### Key changes to indicator structure:

- **Distinction between 'Commitment', 'Performance', and 'Disclosure' indicators removed.** This distinction was previously used to determine maximum indicator scores (with a greater weighting applied to 'Performance' indicators) and for reporting on results. However, it was determined that many indicators did not clearly fit into one of these categorisations, which did not have clear definitions, and that the relative weightings did consistently make sense. It was therefore decided that, with a narrower set of indicators, it was not necessary to distinguish between different indicator types, and it would be simpler for all indicators to be out of 10 points (with one exception in Category D).
- **Stand-alone 'Disclosure' indicators replaced by a new 'Disclosure' multiplier.** This means that indicator scores are revised down for lack of disclosure, and this penalty is proportionate to the score received for that indicator.
- **Removal of sub-indicators.** Previously, some indicators were split into two or more 'sub-indicators', which changed the relative scoring and added complexity.

## Other overarching content-related changes:

- **General ‘Commitment’ indicators removed.** Companies are now only credited for commitments if these are formalised in a clear policy, strategy, or target, for which the company can be held to account, and have clear potential to translate into impact.
- **Only aspects of commercial business are assessed.** All indicators crediting non-commercial activities (such as corporate social responsibility, philanthropy, and participation in government nutrition assistance programmes) have been removed.
- **Priority populations.** The Global Index 2021 used the concept of ‘priority populations’ at risk of malnutrition challenges. We abandoned the approach and use of this terminology, because there is a lack of clear international guidance to how companies can specifically address the needs of these groups. As such, we did not have a valid way to assess the quality of companies’ approaches in terms of what constitutes ‘appropriate’ products for which groups, and how to ensure groups at risk were actually being reached and approached having a positive impact. The fact that this Index is global in scope and assesses a wide range of different company portfolios further adds to this complexity. There is also the potentially problematic nature of asking companies to deliberately market certain processed foods (even if healthy) to ‘priority populations’ specifically. ATNi believes that many of the more obvious ways for addressing the needs of groups at higher risk of malnutrition are sufficiently covered by other aspects of the methodology; e.g. affordable nutrition, adoption of government-endorsed NPMs, fortification, etc.
- **Food loss and waste indicators removed.** This is based on the rationalisation and validation of the methodology, which chose to focus on corporate activities that directly impact consumers’ diets. While food loss and waste are a key sustainability issue and is relevant for nutrition in the long term, it is outside the scope of ATNi’s current research agenda and is better addressed by other actors.

## 2.5 Index structure

The Index is divided into eight thematic areas, or ‘categories’, with a total of 51 indicators distributed between them (Table 3). A full list of indicators is included in this document as Appendix II.

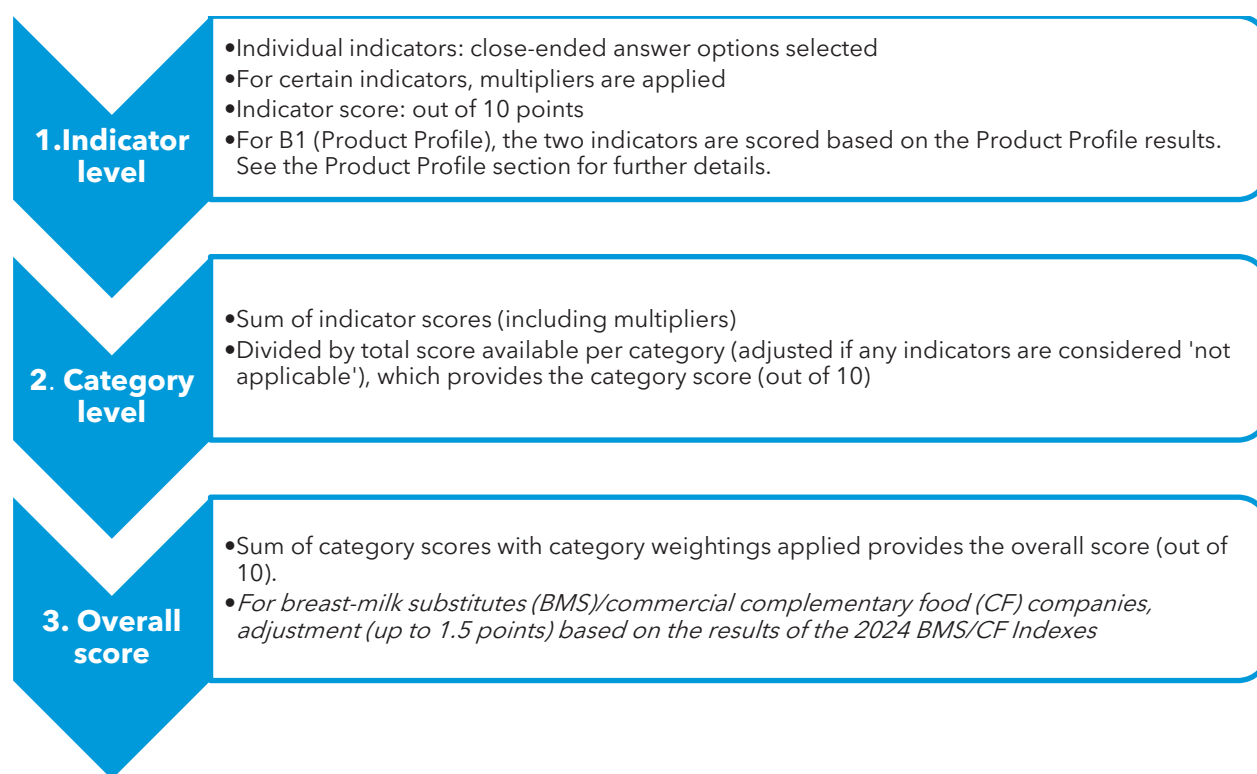
**Table 3. Overview of Global Index 2024 categories**

Category	Weighting	No. of indicators	Rationale for inclusion	What is measured
A. Nutrition Governance	<b>15%</b> (2021: 12.5%)	7	Companies can better prioritise, sustain, and scale their nutrition-related activities if their commitments start at the top and are integrated into core business strategies and management systems	<ul style="list-style-type: none"> <li>• The quality/comprehensiveness of the company’s commercial nutrition strategy</li> <li>• Targets for growing sales of ‘healthier’ products</li> <li>• Quality of reporting on the nutrition strategy and on sales of ‘healthier’ products</li> <li>• Recognition of nutrition in the enterprise risk assessment</li> <li>• The governance of this nutrition strategy: board overview, executive</li> </ul>

				accountability, remuneration/incentives
B1. Product Profile	<b>30%</b> (2021: 20%)	2	Independent assessment of the healthiness of companies' product portfolios	<ul style="list-style-type: none"> <li>Percentage of sales derived from 'healthier' products (HSR <math>\geq 3.5</math>)</li> <li>Mean sales-weighted HSR</li> </ul>
B2. Portfolio improvement	<b>10%</b> (2021: 7.5%)	12 + 4 unscored	Improving product formulation must be a major strand of a company's strategy to help address consumers' diets and health challenges	<ul style="list-style-type: none"> <li>Portfolio targets for sodium; trans fats; saturated fats; sugars/calories; fruits, vegetables, nuts, and legumes (FNVL); and whole grains</li> <li>Reporting on progress per nutrient/component</li> <li>Principles for fortification, including product healthiness criteria</li> </ul>
B3. Nutrient profile models (NPM) for Reporting	<b>5%</b> (2021: 7.5%)	3 + 1 as multiplier	It is important that companies publicly disclose the proportion of their sales that meet a robust definition of 'healthier', ideally using a government-endorsed NPM	<ul style="list-style-type: none"> <li>Whether the company uses a government-endorsed NPM for reporting on portfolio healthiness</li> <li>The transparency of how it applied the government-endorsed NPM</li> <li>The transparency of the company's own NPM used for reporting</li> </ul>
C. Affordable Nutrition	<b>15%</b> (2021: 15%)	5 + 1 as multiplier	Healthy products need to be accessible and affordable, especially to those with low incomes	<ul style="list-style-type: none"> <li>Whether companies have a strategy/approach for ensuring the affordability/accessibility of their 'healthy' products to low-income consumers, and the robustness of this approach</li> <li>Whether companies are taking steps to improve the relative affordability of their 'healthier products'</li> </ul>
D. Responsible Marketing	<b>15%</b> (2021: 20%)	6 + 1 as multiplier	Companies can positively influence the food environment by promoting healthy diets. They need to ensure their advertising is responsible and that their marketing policies extend to cover children, including teens (under 18), and all forms of media	<ul style="list-style-type: none"> <li>Degree of alignment of companies' responsible marketing to children policies with World Health Organization guidelines</li> <li>The quality of companies' audits of their responsible marketing commitments</li> <li>Alignment of their general marketing commitments with International Chamber of Commerce guidelines</li> </ul>
E. Workforce Nutrition	<b>5%</b> (2021: 2.5%)	6	Through workforce nutrition programmes, companies can not only support the nutritional status of their staff and their infants, but can foster a nutrition-focused company culture, in addition to boosting productivity and reducing costs	<ul style="list-style-type: none"> <li>The extent to which companies support the nutrition and health of their workforce - by making healthy food available at work, providing nutrition education, and offering nutrition-related health checks</li> <li>Level of support for breastfeeding mothers in the workplace</li> <li>Level of health and nutrition support for workers at risk of malnutrition in their supply chains</li> </ul>

F. Responsible Labelling	<b>5%</b>  (2021: 10%)	3	Providing transparent, comprehensive, and easily understandable information about the nutritional composition and relative healthiness of companies' products, through government endorsed-labelling, can help guide consumers' choices towards healthier products, and incentivise companies to reformulate to compete on healthiness	<ul style="list-style-type: none"> <li>• Extent of company uptake of voluntary government endorsed front-of-pack labelling systems</li> <li>• Alignment with Codex for back-of-pack labelling</li> <li>• Approach to health and nutrition claims</li> </ul>
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## 2.6 Scoring approach



### 1. Indicator level

Indicators are closed questions and form the basic 'units' of this Global Index, with each assessing a specific aspect of the company's activities. Indicators have a number of scoring options and generally have a fixed maximum score of 10 points; with the exception of one indicator in Category D (Responsible Marketing), which has a maximum of score of 20 points.

Many indicators are subject to one or more 'multipliers', which apply a multiplication of between 0.0-1.0 to the indicator score (based on the answer options selected). Multiplier scores are either selected on an indicator-by-indicator basis (such as the Geographic, Disclosure, and Availability (Category E) multipliers) or derived from the result of a specific indicator (for example, indicator B3.2, C.1, and D.2), which then applies automatically to specific indicators. Details of the specific

multipliers, and the indicators to which the respective multipliers apply, can be found in Appendix II.

Other things to note:

- For certain indicators, a **'not applicable'** answer option is available in specific instances where the indicator is not relevant for the company due to the nature of its portfolio, structure, or geographic scope. When selected, this removes this indicator from the scoring algorithm, and thereby reduces the total score for the category.
- A limited number of indicators are unscored, serving for information purposes only.
- A full list of indicators and scoring options can be found in Appendix II.

## **2. Category level**

For each category, the scores for each indicator (out of 10, with multipliers applied), are added together and divided by the total available score for that category (minus any indicators where 'not applicable' is selected). A category score is then derived, which is presented out of 10.

## **3. Overall scores calculated:**

The total score is derived from the sum of all category scores with each category weighting (see second column of Table 3) applied.

For companies that sell breast-milk substitutes (BMS) and commercial complementary foods (CF) and were assessed in the BMS Index 2024 score and/or CF Index 2024, an adjustment to their overall scores is made based on their results in these indexes.

## **Box 2: Breast-milk substitutes (BMS)/commercial complementary foods (CF) scoring adjustment approach**

Companies that sell BMS and commercial CF must responsibly market their products to protect the health of infants and young children in their most critical period of development. In March 2024, ATNi launched the BMS and CF Marketing Indexes 2024, in which 20 of the largest BMS and CF companies globally were assessed on their commitments and practices against the International Code of Marketing of Breast-Milk Substitutes, including all subsequent relevant World Health Assembly resolutions (collectively referred to as 'the Code'). Of the 30 companies in the Global Index 2024, six were assessed in the [BMS Index 2024](#) and/or [CF Index 2024](#): Danone, FrieslandCampina, Kraft Heinz, Lactalis, Nestlé, and Yili.

For these six companies, their BMS Index 2024 score and/or CF Index 2024 score each result in an adjustment that is applied to their Global Index 2024 score. If a company scores 100% on either the BMS Index or CF Index, no BMS or CF adjustment is made respectively, as a full score reflects full compliance with the Code. If this is not the case, an adjustment is made. As in the previous Global Indexes, the maximum score adjustment is -1.5 points (i.e., an absolute reduction of 1.5 points on a final Global Index score between 0 and 10). However, the latest BMS and CF Indexes are the first ATNI Indexes to assess and score on companies' BMS and CF marketing separately; therefore, the maximum adjustment is split up to -1 proportionate to the BMS score, and a direct adjustment of -0.5 if a company markets CF for children aged under six months. If a company was assessed in both the BMS and CF Marketing Indexes 2024 (such as Danone, Lactalis, and Nestlé), the total adjustment to the Global Index score is a sum of the BMS and CF adjustments. The BMS and CF scores and adjustments applied, for each of the six Global Index companies, are summarized in the table in Appendix III.

For more information about the methodology of the latest BMS and CF Marketing Indexes 2024, read the full document [here](#), in addition to the [consultations report](#) that summarises the key changes (see page 14 for more details on the Global Index scoring).

## 3. Global Index 2024: Research process

### 3.1 Research process

The process of the Global Index 2024 assessment for each of the 30 companies is as follows:

1. ATNi provides companies with access to the data collection platform to input information for each of the indicators over a time-bound period. Companies submit information/evidence for ATNi to review, including that which is not in the public domain and can be under a non-disclosure agreement (NDA), but they cannot change the assessments.
2. For the Product Profile assessment, companies are informed about the (maximum of 12) markets selected, along with the products from the top five best-selling product categories (based on Euromonitor International Passport sales estimates) for each of the markets that will be included in the assessment. Companies are asked to review the lists, indicate if products were delisted or recently launched, and provide data on ingredients and (macro- and micro-) nutrients. For companies that decide not to engage or provide product data, ATNi uses label information as obtained from Innova Market Insights.
3. Once the data platform closes to companies, ATNi researchers evaluate companies' inputs and, based on the information provided, assign the most appropriate scoring and multiplier options. Additional research using publicly available information is conducted by the researchers to ensure that all relevant information is captured, including for non-engaging companies. A question is posed to the company to invite them to provide relevant evidence that could potentially warrant a higher score, or clarify the input provided during the first round.
4. Companies have a second opportunity to access the platform to review their assessment and/or answer clarification questions raised by ATNi analysts. New information and documents are accepted if shared before the research deadline, which for the Global Index 2024 was 1 July 2024. Companies cannot make changes or edit the assessment itself on the platform.
5. The ATNi research team evaluates the companies' comments and newly submitted evidence for each indicator, and a judgement is made as to whether to adjust the score.
6. Before calculating the total scores for each company, a final peer review and quality assurance process is conducted by the ATNi research team, whereby another analyst reviews all indicators for a specific category, and discrepancies in the assessment are resolved by internal discussion and agreement, including with the research director and senior research manager. The Product Profile results are reviewed together with ATNi's research partner, TGI.
7. Afterwards, scorecards are developed for each company, showcasing the main findings of the assessment, presenting the Product Profile results, and providing key recommendations. At this point, the final report is written, which includes, along with the scorecards, an executive summary and thematic chapters. The scorecards and company-specific sections in the report are shared with companies for fact checking two weeks before publication, and the entire report is shared with the companies 24 hours before publication, under embargo.

## 3.2 Quality assurance

The validity of ATNi's analysis and related scoring depends on the accurate and consistent assessment of the material submitted or published by the companies. Each category is assigned to one analyst in the research team throughout the process, to better optimise knowledge, understanding, and consistency in scoring between companies for the same indicators.

Before the initial assessment of companies' input on the survey is conducted by ATNi analysts, the ATNi research team conducts an internal workshop focused on aligning analysts' research approaches - with the goal to provide the most consistent information on the assessment of companies.

To ensure fair and consistent scoring, an internal peer review is conducted after the second round of company engagement, to check the consistency of assessments for all companies and indicators. During peer review, a meeting with the original category analyst, the peer reviewer, and research lead and other relevant senior researchers, is held to discuss the assessment and any unclarities or disagreements. Based on this, final adjustments in the assessment are made if necessary. All seven categories are reviewed in this way.



## 4. Research limitations

### **The trade-off between aligning with new developments and providing comparability over time**

ATNi's methodology recognises the current state of knowledge across the nutrition topics in its Indexes, and aims to remain flexible and continually evolve. This means indicators may be removed, added, and changed over the different iterations. Therefore, a direct like-for-like comparison, especially in terms of scores, is not always possible between Indexes. Given the extent of the methodology revision for this Index, comparability with the previous Index in terms of scoring is even more limited. Where possible, ATNi has sought to highlight developments since the 2021 index on an indicator-by-indicator basis through qualitative analysis.

### **The index uses the same framework to assess a range of companies with very different features**

The companies assessed in this index vary considerably in terms of portfolio types, size, market presence, ownership structure, regulatory contexts, and cultural context. While one of ATNi's key research principles when developing its methodologies is to ensure relevance, applicability, and comparability to a range of company types, some indicators will naturally have greater or lesser applicability to certain companies than others. ATNi has sought to manage this by including the option to make certain indicators 'Not applicable' for certain companies, thereby removing the indicator from the scoring. However, it is not always black-and-white, and doing so could be considered to give that company a slight scoring advantage over those to which the indicator applies.

### **A substantial part of the index assesses companies' commitments and self-reported performance, without independent verification**

The majority of indicators rely on companies' self-reported information and data, as it is not feasible to perform independent, on-the-ground assessments of companies' practices across all topics covered in this Index. It is assumed that all publicly reported and privately disclosed data is accurate; for many indicators ATNi requires companies to provide evidence of performance, and to implement independent auditing where relevant.

### **The true performance of non-engaging companies, or companies with limited engagement, may not be fully captured**

Scores for companies with limited or no disclosure and/or those that do not engage with ATNi during the research process tend to be lower, and may not provide a full representation of the companies' nutrition-related activities. However, it is worth noting that 25 of the 30 companies engaged during this iteration.

### **Time constraints may limit the amount and quality of evidence that companies can provide**

Completing the Index assessment survey and providing feedback on the Product Profile product lists requires significant time from the companies. Time constraints may limit the amount of information (which is not already publicly available) that companies share, and therefore may not provide a full representation of the companies' nutrition-related activities.

### **Confidentiality of some company information**

Some of the data shared by the companies is provided under non-disclosure agreement and therefore cannot be referenced explicitly in the report. However, it is reviewed by ATNi research analysts and, if relevant, incorporated into their scores for indicators. By default, data shared with

ATNi that is not publicly available is not taken into account for indicators that require disclosure, and will result on a 'No' score for the disclosure multiplier for other indicators.

**The research does not capture all corporate activities that may also have an indirect but significant impact on public health**

The research is an in-depth examination of corporate practices on nutrition only. ATNi's methodology for the Global Index aims to comprehensively capture the most important nutrition-related policies and practices of the largest food and beverage manufacturers. It does not assess other important corporate issues of policy and practices of food and beverage manufacturers, including: 1) environmental sustainability, for which we partner with the World Benchmarking Alliance and summarise their findings where possible; 2) corporate tax avoidance practices; 3) corporate wealth and income distribution; and 4) country-specific food lobbying practices. In the future, and depending on available resources, ATNi will include elements of each of these topics in our Indexes, so more comprehensive company evaluations can be provided.

**Product Profile**

For a full explanation of the limitations for the Product Profile assessment, please refer to the [full Product Profile Report](#).

# Appendix I

## Global Index 2024 Expert Group

The mandate of the Global Index Expert Group is to provide input into the development of the methodology and other aspects of the Global Index 2024. This group consists of members with expertise in various aspects of nutrition (including health dimensions of obesity and diet-related chronic diseases, marketing, labelling, use of claims, nutrient profiling, regulatory issues, etc.). The members of the Expert Group serve in their personal capacities and in an advisory role. As such, the scope and content of ATNI's publications do not necessarily reflect their views or the views of their institutions. Members are listed below.

### **Chair of ATNI Expert Group - Shiriki Kumanyika**

Professor Emerita of Epidemiology, University of Pennsylvania

### **Rachel Crossley**

Head of Stewardship, Europe at BNP Paribas Asset Management

### **Jessica Fanzo**

Professor of Climate, Director of the Food for Humanity Initiative, Climate School, Columbia University

### **Jennifer Harris**

Senior Research Advisor, Rudd Center for Food Policy & Obesity, University of Connecticut

### **Terry Huang**

Professor Health Policy and Management, School of Public Health and Health Policy, City University of New York. Founder, Firefly Innovations

### **Mike Rayner**

Professor of Population Health, Nuffield Department of Population Health, University of Oxford

### **Mary Story**

Professor, Global Health and Family Medicine and Community Health, Duke University

### **Christina Vogel**

Professor of Food Policy, Director of the Centre for Food Policy, City St George's, University of London

# Appendix II: Global Index 2024: Detailed methodology

## Multipliers:

Where an indicator has a 'Multiplier', the score is adjusted based on which Multiplier answer option is selected. The Global Index 2024 features several multipliers. The 'geographic' and 'disclosure' multipliers, explained below, are used throughout all categories, and are selected on an indicator-by-indicator basis. In addition, Categories B3, C, D, and E have category-specific multipliers: for B3, C, and D, the multiplier is the result of a specific indicator; for E, the multiplier is selected on an indicator-by-indicator basis.



**Geographic multiplier:** In order to encourage companies to ensure that their commitments, policies, and activities are delivered in all markets in which they are active, rather than on a more limited geographic basis, ATNI applies a 'geographic multiplier' to certain indicators. This multiplier adjusts the score of the indicator based on the geographic scope of a commitment/policy/activity based on the evidence found or provided:

Global	1.0
Multiple markets	0.75
Single market	0.5

### Notes on use:

If a company derives more than 50% of its sales from one market, and the company is credited based on a commitment/policy/activity that covers that market only, 'Multiple markets' can be selected.



**Disclosure multiplier:** In order to encourage companies to be transparent about their commitments, policies, and activities, to enable greater scrutiny by stakeholders and enhance accountability, ATNI applies a 'disclosure multiplier' to certain indicators. This multiplier adjusts the score of the indicator based on how transparent the company is about a commitment/policy/activity, i.e. the extent to which the information scored in the indicator is available on the company's public domain (i.e., own website(s) and reports):

Fully	1.0
Partially	0.9
No	0.8



### Notes on use:

- 'Fully' is selected when *all* necessary information is on the public domain.
- If some information is publicly available but key details are scored based on internal documentation provided by the company during engagement, 'Partially' is selected.
- If information used to score the indicator is publicly available on the websites/reports of third-party organisations (such as industry associations or initiatives), 'Partially' is selected. If the third-party source is an online news site/magazine etc., 'No' is selected


# Category A: Governance



**Category weighting:** 15%

**Total possible score:** 70


Indicator No.	Indicator Question	Answer Options	Score
<div>1.</div> <div></div> <div></div>	Does the company formally set out a clear strategy/plan to contribute to healthier diets and address malnutrition through its commercial operations (i.e. "nutrition strategy")?	a. Company has clear and multi-faceted nutrition strategy beyond product formulation and core responsibilities	10
		b. Company has clear nutrition strategy limited to product formulation and core responsibilities	5
		c. Company articulates commitment to grow through a focus on nutrition and health	2.5
		d. No/ no information	0
	<b>Scoring guidance</b>  To be considered as a 'nutrition strategy' ( <b>answer options a. and b.</b> ), the company must clearly set out: (1.) in <b>one place</b> (e.g. document, report page, webpage), (2.) <b>multiple different approaches</b> how it plans to improve diets/address malnutrition through its commercial activities, and that these (3.) encompass a <b>significant proportion of its portfolio</b> (rather than a narrow selection of specific product ranges).  If any of these conditions are not satisfied, <b>answer option c.</b> is selected, since this indicates that the company's approach to contributing to healthier diets and addressing malnutrition is ad hoc and not strategically planned.  To be credited with <b>answer option a.</b> , the company's strategy involves a multi-faceted approach that goes beyond product portfolio development and core responsibilities (such as responsible marketing to children and labelling commitments) to also consider either/both:  (1.) how 'healthier' products reach consumers at a proportionately greater rate than less healthy products (for example, through relative pricing, distribution models, marketing spending on healthier products relative to general portfolio), or		


	<p>(2.) how the company ensures that a wide range of its 'healthier' products reach low-income consumers and/or other at-risk populations (for example, through affordable pricing and/or accessibility strategies).</p> <p>If the strategy only includes portfolio development (i.e. (re)formulation, fortification, portfolio control, etc), core responsibilities (responsible marketing to children and labelling commitments), and/or other potentially relevant approaches (such as recipes instructions, consumption tips, and other forms of on-pack nutrition education), then <b>answer option b.</b> is credited.</p> <p>When a company only reports on recent nutrition-related activities, <b>answer option c.</b> can be selected: these activities may be credited elsewhere in the methodology (such as indicator 3), but this is not sufficient to be credited as a 'strategy', which should be <b>forward-looking</b>, i.e. what it plans to do in the coming years.</p> <p>Meanwhile if a company acknowledges its role in addressing public health challenges without clearly describing how the company aims to address these challenges through its business, <b>answer option c.</b> is selected.</p> <p><b>Note:</b> Non-commercial activities (e.g. philanthropy, initiatives only available for specific consumers, etc), including efforts to address food insecurity via non-commercial channels, are not taken into consideration.</p>		
	<p><b>Rationale</b></p> <p>Increasing rates of malnutrition continues to challenge efforts to achieve the Sustainable Development Goals (SDGs), <a href="#">impacting not only public health, but also economies, the environment, and the quality of life of billions of consumers, both now and in the future.</a> The manufacturers of food and beverages have an ever-more urgent responsibility and opportunity to contribute to healthier diets and address malnutrition through their commercial operations. This means being willing to decouple their financial performance from products and strategies that risk exacerbating nutrition outcomes, and instead striving to achieve commercial growth through a focus on nutrition and being part of the solution.</p> <p>Since they have the potential to impact the diets of consumers through many different aspects of their commercial operations, not only from the healthiness of the products they sell, but also from how these are marketed, priced, distributed, and labelled, for example, it is important that these companies develop a clear strategy or plan to harness these approaches to contribute to healthier diets. This should be done in an integrated manner, for which targets can be developed, formal accountability assigned within the company, and key performance indicators (KPIs) and/or milestones defined to drive and sustain progress.</p> <p>This strategy should be outlined and presented cohesively in a publicly available document/page, both to signal to external stakeholders the company's plans, enabling scrutiny and accountability, and to show that the planned activities are deliberate and intentional, rather than ad hoc and incidental.</p>		
2.	How comprehensively does the company publicly report on its progress on implementing its nutrition strategy?	a. Quantitative metrics of progress on the strategy, covering all key elements	10
		b. Quantitative metrics of progress covering most key elements	6.6


		c. Quantitative metrics of progress covering specific elements, AND/OR primarily qualitative or specific examples of actions taken for each key element	3.3
		d. No reporting / no information	0
<p><b>Scoring guidance</b></p> <p>Only reporting against key elements (i.e. approaches, pillars, workstreams, KPIs, etc) described in the company's nutrition strategy (as assessed in Indicator 1) are taken into consideration for this indicator.</p> <p>To be credited with <b>answer option a.</b>, it must be clear that each key element of the company's nutrition strategy that can realistically be quantified as a metric is reported. If one or more key elements are not measured and reported on quantitatively, answer option b. is selected. If only one or two key elements are measured and reported on quantitatively, answer option c. is selected.</p> <p>These metrics must reasonably seek to provide an authentic indication of the company's progress on its objective: for example, quantitatively reporting efforts relating to very specific products only, or the reporting of illustrative statistics (e.g. "100 tons of sugar removed...") will only be taken into account for answer option c.</p> <p>'Qualitative' examples include lists or case studies of specific product launches/reformulations in the past year, examples of specific marketing campaigns for specific healthy products, etc.</p> <p>If a company is credited with answer option c. in indicator 1 and only has one or two strategic elements, the highest answer option it can receive for this indicator is b.</p> <p>Only reporting on the company's own public domain (e.g. website or reports) is taken into consideration for this indicator.</p> <p><b>Rationale</b></p> <p>It is important that companies publicly report on progress made against each element of their nutrition strategies: doing so publicly enhances the credibility of their efforts, enabling stakeholders to hold them accountable if progress is slow and ensuring that companies are meeting their goals.</p> <p>Ideally, the company tracks progress systematically and quantifiably. A key aspect of a robust strategy is the development of quantitative metrics or KPIs for each element (where this is feasible) in order to measure progress/success. This helps to drive results and enhances internal accountability. When reported publicly, this further enhances the credibility of its efforts in the eyes of external stakeholders, as it reduces the risk of a company cherry-picking specific or qualitative examples to report, on while also carrying out activities that run counter to these.</p>			
3.		a. Relative to overall sales	2.5


  	Has the company set a target to increase (the relative proportion of) sales of 'healthier' products (as defined by formal nutrition criteria), with the following features?	b. Specific and measurable	2.5
	(tick all that apply)	c. Timebound	2.5
		d. Using the definition of 'healthier' according to an internationally recognised/government-endorsed nutrient profile model (NPM), or equivalent	2.5
		e. No target / no information	0
<p><b>Scoring guidance</b></p> <p>The company can only be credited for this indicator if it is clear how it defines 'healthier' in this case. This must be a formal definition with nutrient criteria (including, at minimum, upper thresholds for nutrients of concern). Also note that Category B has indicators relating to targets for specific food components; the focus here is on overall sales of products categorised as 'healthier'.</p> <p>For additional points (<b>answer option d.</b>), the company must use the thresholds of an internationally recognised/government-endorsed NPM, or be able to show that its definition is stricter, or within a 10% deviation. Moreover, it must be clear that the NPM is used as it was intended in its design, i.e. only applied to relevant product categories. If it is applied to categories beyond the scope of the NPM in question, this answer option will not be selected.</p> <p>To be credited with <b>answer option a.</b>, the target must be formulated such that sales of 'healthier' products must grow faster than the rest of the portfolio; if sales of unhealthy products increase, sales of 'healthier' must increase at a greater rate. For example, "By 2026, X% of total revenue achieved from sales of 'healthier' products", or "By 2025, sales of healthier products will grow at least 30% faster than sales of unhealthy products." If the target is only to increase sales of 'healthier' products by a certain amount, regardless of increases in unhealthy sales, this answer option will not be selected.</p> <p>To be credited with <b>answer option b.</b>, the target must have a clear end goal, and with all key terms clearly defined and externally-verifiable (i.e. not relying on company-internal definitions). If the target involves a relative increase (e.g. increase of 10% by 2025), then the baseline value must be provided.</p> <p>To be credited with <b>answer option c.</b>, the target must include a clear target year and baseline year.</p> <p>Note that this indicator assesses targets for <i>sales</i>, which can be in terms of value, volumes, servings, or SKUs, rather than the number/proportion of products classified as 'healthier' in the company's portfolio.</p>			



		<p>*For a full list of government-endorsed NPMs please see this scientific review from 2018: <a href="https://doi.org/10.1093/advances/nmy045">https://doi.org/10.1093/advances/nmy045</a>, Table 3; or updated version from 2023: <a href="https://doi.org/10.1016/j.advnut.2023.08.013">https://doi.org/10.1016/j.advnut.2023.08.013</a>.</p>	
		<p><b>Rationale</b></p> <p>To make the company's commitment to improving public health through its products more accountable, companies should set targets to increase the sales of its 'healthier' products (defined by a formal set of criteria in a Nutrient Profile Model (NPM)). Ideally, this target should be in relation to overall sales, as companies are encouraged to promote the sales of their 'healthier' products at a greater rate than their less healthy ones; otherwise increased sales of unhealthy products may negate the net positive impact of the company's 'healthier' products.</p> <p>This kind of target makes the company's commitment to deriving commercial value from healthier products more concrete, since it encapsulates both (re)formulation and promotion (including marketing and pricing), as well as acquisition and divestment activities. Moreover, it helps to drive performance within the company and enhances accountability (both internally and externally) for achieving it.</p>	
<p>4.</p> 	Does the company <b>publicly</b> report on its sales of 'healthier' products?	a.1 Yes, for 'healthier' sales relative to overall sales	4
		a.2 Yes, for total sales of 'healthier' products only	2
		b. Using an internationally recognised/government-endorsed NPM, or equivalent	4
		c. Reported annually	2
		d. No / no information	0
		<p><b>Scoring guidance</b></p> <p>Only one answer option 'a.' can be selected.</p> <p>The company can only be credited for this indicator if it is clear how it defines 'healthier' in this case. This must be a formal definition with nutrient criteria (including, at minimum, upper thresholds for nutrients of concern), rather than specific product lines branded arbitrarily as 'healthier'.</p> <p>For additional points (<b>answer option b.</b>), the company must use the thresholds of an internationally recognised/government-endorsed NPM,* or be able to show that its definition is stricter, or within a 10% deviation. Moreover, it must be clear that the NPM is used as it was intended in its design, i.e. only applied to relevant product categories. If it is applied to categories beyond the scope of the NPM in question, this answer option will not be selected.</p>	

	<p>Note that this indicator assesses reporting on <i>sales</i>, rather than the number of products classified as ‘healthier’ in the company’s portfolio. Sales can be in terms of ‘value’ or ‘volumes’.</p> <p>*For a full list of government-endorsed NPMs please see this scientific review from 2018: <a href="https://doi.org/10.1093/advances/nmy045">https://doi.org/10.1093/advances/nmy045</a>, Table 3; or updated version from 2023: <a href="https://doi.org/10.1016/j.advnut.2023.08.013">https://doi.org/10.1016/j.advnut.2023.08.013</a></p> <p><b>Rationale</b></p> <p>It is important for transparency that the company publicly discloses what proportion of its total sales is derived from sales of products meeting its ‘healthier’ definition, in order to enable stakeholders to better hold the company accountable for its impact on consumers’ diets.</p>		
<p>5.</p> 	<p>Does the company formally recognise in its global enterprise risk assessment (or equivalent) risks explicitly linked to nutrition and rising rates of malnutrition and diet-related diseases?</p>	<p>a. Yes, three or more nutrition-related risks identified, including at least one systemic nutrition-related business risk</p>	<p>10</p>
		<p>b. Yes, three or more nutrition-related risks identified</p>	<p>7.5</p>
		<p>c. Yes, one or two nutrition-related risks identified</p>	<p>5</p>
		<p>d. No/ no information</p>	<p>0</p>
	<p><b>Scoring guidance</b></p> <p>Examples of nutrition-related risks relevant for food and beverage companies include:</p> <ul style="list-style-type: none"> <li>▪ future nutrition-related taxes;</li> <li>▪ impact of future potential nutrition-related litigation;</li> <li>▪ impact of future potential regulation of marketing of less healthy food products;</li> <li>▪ impact of future potential regulation of labelling and health and nutrition claims;</li> <li>▪ likelihood of loss of market share due to consumer concerns related to nutrition;</li> <li>▪ likelihood of significant loss of revenues due to consumers’ changing buying habits towards healthier purchasing habits;</li> <li>▪ impact on reputation and/or brand value of poor performance on nutrition and contributing to malnutrition.</li> </ul> <p>To be credited with <b>answer option a.</b>, the company’s enterprise risk assessment must clearly have identified at least one of the following systemic risks posed by the negative impacts of malnutrition for the company’s performance:</p> <ul style="list-style-type: none"> <li>▪ lost productivity, healthcare costs, and higher staff turnover associated with poor nutrition among company’s current and future workforce;</li> <li>▪ risks associated with current and future poor economic performance of key markets due to prevalence and effects of malnutrition;</li> </ul>		

	<ul style="list-style-type: none"> <li>reduced commercial opportunities in new markets due to development constraints in LMICs as a result of the prevalence and effects of malnutrition.</li> </ul> <p>ESG Materiality assessments, while important, are a <a href="#">separate process not considered equivalent to enterprise risk assessments</a>, and are therefore outside the scope of this indicator. Ideally, <a href="#">the results of the ESG Materiality assessment would feed into the enterprise risk assessment</a>, and would be evident in the final risk report.</p> <p><b>Rationale</b></p> <p>Identification of risks and opportunities that could affect the financial performance and strategic success of a company is an essential process for any business, especially (but not limited to) those that are publicly listed. Most companies, regardless of size or ownership type, engage in a process called 'Enterprise Risk Management' (ERM) to develop a holistic, portfolio view of the most significant risks to the achievement of the entity's strategy and objectives (as well as the opportunities). Identification of these risks enables the company to develop plans and processes to anticipate them and mitigate their potential future impact on the business and strategy, and hence are usually reviewed at Board-level.</p> <p>For companies producing and selling food and/or beverage products, a wide range of risks are posed related to nutrition - see 'Scoring guidance' for examples. Clear identification of the wide range of nutrition-related risks in a company's ERM system indicates that the company acknowledges the potential cost of failing to address malnutrition in its commercial strategy and operations, and should clearly be conveyed to its shareholders (if applicable) and other stakeholders. This could also result in this issue being prioritised to a greater extent within the company.</p>		
6.  	Is the company's nutrition strategy reviewed by its Board of Directors?	a. Evidence of Board-level review of nutrition strategy specifically	10
		b. Evidence only of Board-level review of wider ESG/Sustainability agenda, of which nutrition is part	5
		c. No/ no information	0
	<p><b>Scoring guidance</b></p> <p>Evidence for <b>answer option a.</b> could include an explicit statement in its reporting that its nutrition strategy is specifically reviewed by the Board of Directors, or through evidence such as a Board meeting agenda / minutes showing this to be the case.</p> <p>If it is only stated that the Board reviews 'ESG' or 'sustainability' topics, a wider ESG/sustainability strategy (or equivalent), of which the nutrition strategy is part, but Board of the nutrition strategy specifically is not clearly mentioned or demonstrated, <b>answer option b.</b> is selected.</p> <p><b>Rationale</b></p>		

	Governance starts with the Board of Directors, since the Board holds the ultimate decision rights on such issues and the <a href="#">company's strategic direction</a> . Boards play a central role in aligning ESG initiatives with the strategic direction of the company, ensuring it is focused on material topics (both risks and opportunities), establishing targets and accountability, and assessing the company's performance at a <a href="#">company-wide level</a> . While ESG implementation will be devolved to individual business units, Boards play a central role in establishing a clear strategic direction, focusing on the long-term, and developing a plan to avoid fragmentation and duplication. Regularly discussing and reviewing the nutrition strategy at Board-level is a clear indication that the company considers it a priority for the company.		
<div>7.</div> <div></div>	Is accountability for the company's nutrition strategy assigned to the highest levels of the company, and how is successful implementation incentivised?  (tick all that apply)	a.1 Formal accountability assigned to CEO (or equivalent)	5
		a.2 Formal accountability assigned one level below CEO (e.g. other C-Suite Executive)	2.5
		b.1 Executive remuneration linked to performance on nutrition-related objectives	5
		b.2 Evidence of other formal incentive arrangements at a lower level than C-Suite	2.5
		c. No / No information	0
	<b>Scoring guidance</b>  Only one answer option 'a.' and one answer option 'b.' can be selected.  This indicator assesses accountability for either the main nutrition strategy credited in indicator 1, and/or the 'healthier' sales target assessed in indicator 3.  For <b>answer options a.1/a.2</b> , the 'accountable person' is the individual who has 'ownership' of the strategy, and is responsible for its success or failure. For example, if the company has set high-level nutrition-related targets and/or has set KPIs (e.g. on growing sales of 'healthy' products, this person is held responsible for achieving this goal and driving progress. Without targets/KPIs, it must clearly be clear from external reporting or internal documentation where responsibility lies, and how success is measured.  To be credited with <b>answer option a.1</b> , it must be clear that the CEO (or equivalent)'s performance is appraised on success on the nutrition strategy; it is not sufficient to state that the CEO is the ultimate owner because they are ultimately responsible for all company activities.		

	<p>For <b>answer option a.2</b>, titles that would count as C-Suite or 'Senior Executive' will depend on the company, but may include Vice President of X, Chief X Officer, for example.</p> <p>For <b>answer option b.1</b>, remuneration arrangements could include bonuses, stock options, or other incentives. The company must show that it has clear targets or KPIs/metrics on which performance is measured, and they are applied to the individual credited in a.1/a.2.</p> <p><b>Answer option b.2</b> is selected if the remuneration arrangements or other incentives are applied at a lower level than the individual credited in a.1/a.2, or if the arrangements apply to more than one individual.</p>
	<p><b>Rationale</b></p> <p>The level at which responsibility for the nutrition strategy resides within the company's management has significant impact: to exert sufficient influence, drive accountability, and ensure alignment with the business strategy, the lead should be a senior executive. The CEO also plays a critical role in setting the tone at the top and emphasising the importance of the nutrition strategy. Assigning direct responsibility for the successful implementation of the strategy to the CEO or other senior executives not only further demonstrates this commitment, but also increases the chance of sustained success of the strategy, since senior personnel have greater ability to prioritise the strategy, coordinate different business units, and allocate necessary resources for the <a href="#">success of the strategy</a>.</p> <p>In order to make accountability for the nutrition strategy more concrete, the responsible person's <a href="#">compensation should be linked to success</a> in the nutrition strategy, meaning that they are directly incentivised to act in the best interests of the nutrition strategy and <a href="#">prioritise its objectives</a>.</p>

## Category B: Products

### B1: Product profile

**Category weighting:** 30%



This part of the assessment is carried out independently, as a parallel process to the rest of the survey in Probench.

No.	Indicator question	Answer options	Score
1.	Assessment of the overall healthiness of the product portfolio, measured as the sales weighted mean HSR score: [the 0-5 star mean HSR is multiplied to get a value between 0 and 10]		0-10
2.	Assessment of the percentage of estimated sales from products with HSR score of 3.5 or higher.		0-10

## B2: Portfolio development



**Category weighting:** 10%



**Total possible score:** 120



No.	Indicator question	Answer options	Score
<b>1.</b>  	What kind of target has the company set to reduce levels of salt/sodium across its applicable portfolio, and is it specific, measurable, and timebound?  (Tick all that apply)	a.1. Target to increase alignment with WHO global sodium benchmarks, for all relevant product categories	5
		a.2. Target to increase alignment with WHO global sodium benchmarks, for some relevant product categories	2.5
		a.3 Target not aligned with WHO global sodium benchmarks, for all relevant product categories	2.5
		a.4 Target not aligned with WHO global sodium benchmarks, for some relevant product categories	1.25
		b. The target is specific and measurable	2.5
		c. The target is timebound	2.5
		d. No / no information	0
		e. Not applicable	-
	<b>Scoring guidance:</b>  Only one 'a.' answer option can be selected.  Answer option a.: Example of a target to to increase alignment with the <a href="#">WHO sodium benchmarks</a> could be: - By 2028, 80% of products meet the WHO sodium benchmarks; - Increase the proportion of products meeting the WHO sodium benchmarks by 60% by 2026.		



	<p>To be credited with answer options a.1 or a.2, the same product sub-categories defined in the WHO sodium benchmarks must be used.</p> <p>To be credited for answer option b., 'specific and measurable', the target should involve either:</p> <p>(1) specific nutrition criteria or limits (per g/ml/kcal, or per serving (where serving sizes are publicly available)) for certain product groups/categories, or specifies a portfolio (mean) target value), (i.e. If the company commits to meeting an absolute measure (e.g., the WHO sodium benchmarks), then this can be credited); or</p> <p>(2) relative reduction criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported)..</p> <p>Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.</p> <p>c. To be credited for answer option c., 'timebound', a baseline and target year must be set: e.g., an X% reduction in salt by 2025 (from 2020 levels).</p> <p>For dairy products, a salt/sodium target is only relevant for products with added salt.</p> <p>'f. Not applicable' can be selected if the company's portfolio does not typically contain salt/sodium (e.g. non-dairy beverages). This results in this indicator being removed from the total score for this category.</p>		
	<p><b>Rationale</b></p> <p>Diets high in sodium are associated with an increased risk of non-communicable diseases such as hypertension, cardiovascular disease and stroke. As part of its efforts to drive progress in reducing sodium intake in the global population, the WHO has established global benchmarks for sodium levels in foods across different food categories. These can be found here: <a href="https://www.who.int/publications/i/item/9789240025097">https://www.who.int/publications/i/item/9789240025097</a></p> <p>The WHO recommends a daily consumption of &lt;5g of salt (i.e. &lt;2g of sodium) for adults. Further, WHO Member States have agreed to strive for a reduced intake of salt at the global population level by a relative 30% by 2025. Industry is encouraged where possible to limit use of salt as an ingredient and improve accessibility and affordability of low salt products.</p> <p>To both make the company's portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.</p>		
2.	Can the company provide quantitative evidence of making progress on sodium/salt reduction across its applicable portfolio within the last 3 years?	a. Yes, evidence of increasing the proportion of products meeting the WHO sodium benchmark thresholds across all relevant product categories	10





 		b. Yes, across all relevant product categories	7.5
		c. Yes, across specific product categories	5
		d. Yes, for specific products only	2.5
		e. No / no information	0
		f. Not applicable	-
	<p><b>Scoring guidance:</b></p> <p>To be credited with answer option a., the <a href="#">WHO sodium benchmarks</a> must be explicitly referred to, and the company must confirm that the same product sub-categories defined in the WHO sodium benchmarks must be used.</p> <p>To be credited with answer option b., the company can report quantitatively on (or share evidence of) its sodium/salt reduction either at the portfolio level, or at the category-level for all relevant categories. Reporting/evidence can either be year-on-year or relative to a baseline year, but must show progress to be credited. Examples can include:</p> <ul style="list-style-type: none"> <li>- X% reduction in sodium levels across the category/portfolio;</li> <li>- Y% of products meeting maximum sodium thresholds;</li> <li>- Z% of products which have achieved X% reduction in sodium levels.</li> </ul> <p>If the company only provides examples of specific products for which it has reduced sodium levels, answer option d. is credited, unless these specific products can be shown to constitute more than 20% of the company's sales.</p> <p>The reporting of illustrative statistics (e.g. "1 million tons of salt removed...") will not be credited.</p> <p>'f. Not applicable' can be selected if the company's portfolio does not typically contain salt/sodium (e.g. non-dairy beverages). This results in this indicator being removed from the total score for this category.</p> <p><b>Rationale:</b></p> <p>Diets high in sodium are associated with an increased risk of non-communicable diseases such as hypertension, cardiovascular disease, and stroke. As part of its efforts to drive progress in reducing sodium intake in the global population, the WHO has established global benchmarks for sodium levels in foods across different food categories. These can be found here: <a href="https://www.who.int/publications/i/item/9789240025097">https://www.who.int/publications/i/item/9789240025097</a>.</p> <p>It is important that companies systematically track and publicly report on their progress in reducing levels of sodium/salt across their portfolios. Doing so helps drive results within the company and enhances accountability, both internally and externally. Quantitative measurement and reporting is</p>		



	important as it presents a more comprehensive and credible picture of the company's overall progress: while reductions at the product level are important, tracking/reporting at the category/portfolio level shows the relative impact of product-level reductions.		
<b>3.</b>  	Has the company eliminated (or reduced in line with the WHO recommendation) industrially produced trans fats (iTFA) from its applicable portfolio (applicable to all relevant product categories)?	a. Yes, AND provides information about its processes to prevent presence of iTFA in relevant products	10
		b. Yes, without providing information about its processes to prevent presence of iTFA in relevant products	7.5
		c. No, but the company has a time-bound target in place to eliminate (or limit in line with the WHO recommendation) for ALL relevant product categories	5
		d. No, but the company has a time-bound target in place to eliminate (or limit to the WHO recommendation) for SOME relevant product categories	2.5
		e. No statement or target / no information	0
		f. Not applicable	-
	<p><b>Scoring guidance:</b></p> <p>Product categories with a high risk of containing iTFA include baked goods, confectionery, dairy, ice-cream/frozen desserts, ready meals, savoury snacks, sweet biscuits, snack bars, fruit snacks, sweet spreads and additives e.g. flavourings and emulsifiers. To be credited a. or b., the company should have a clear public or internal statement that industrially-produced trans fatty acids (iTFA) have been eliminated from its full product portfolio, or limited to &lt;2g iTFA per 100g of fats and oils (as per the WHO recommended threshold). Alternative terms to iTFA/trans fats such as 'partially hydrogenated oils' (PHOs) and 'partially hydrogenated cooking oils' are accepted.</p> <p>To be credited with answer option a., the company should also have a statement, policy, or evidence of the measures it has in place to control for iTFA and prevent it re-entering its portfolio. This can be, for example, a supplier specification (showing monitoring of purchasing ingredients not containing iTFA, PHOs etc.), or Standard Operating Procedure (SOP) document(s).</p> <p>f. 'Not applicable' can be selected if the company's portfolio does not contain products from categories with a risk of iTFA ingredients e.g. beverages such as juices, carbonated sodas or food products such as flour, canned meat, fish, fruits etc.) or where TFA is most likely coming from ruminant sources e.g., dairy and meat. This results in this indicator being removed from the total score for this category.</p>		



	<p><b>Rationale:</b></p> <p>Intake of trans-fatty acids (TFA) is associated with increased risk of heart attacks and death from heart disease. TFA are semi-solid to solid fats which occur in two forms: industrially produced TFA (iTFA) and naturally occurring TFA (ruminant). iTFA can form at low levels during oil refining processes, and therefore can be produced during product manufacture or be present in sourced ingredients (supply side). Therefore, companies should have a statement, policy, or evidence of measures in place to control for iTFA, such as supplier specification (showing monitoring of purchasing ingredients not containing iTFA, PHOs etc.), or Standard Operating Procedure (SOP) document(s).</p> <p>In 2018, WHO launched the REPLACE initiative, calling on <a href="#">countries</a> and <a href="#">industry</a> to eliminate iTFA globally by 2023. In 2019, 11 members of the International Food and Beverage Alliance (IFBA) signed a commitment stating their intention to voluntarily limit iTFA to below 2g per 100g fats and oils in their products worldwide. ATNI's interim assessment of companies' progress toward their commitment between 2021-2022, covering eight iTFA-associated product categories across fourteen markets found that progress is uneven across food categories, companies, and markets. Relatively high TFA levels were observed in countries with no known measures or with limited complementary measures in place to monitor or control TFA in the supply chain.</p>		
<p><b>4.</b></p>  	<p>Has the company set a target to reduce levels of saturated fats across its applicable portfolio, and is it specific, measurable, and timebound?</p> <p>(Tick all that apply)</p>	a.1. Yes, for all relevant product categories	5
		a.2. Yes, for some but not all relevant product categories	2.5
		b. Specific and measurable	2.5
		c. Timebound	2.5
		d. No / no information	0
		e. Not applicable	-
	<p><b>Scoring guidance:</b></p> <p>Only one 'a.' answer option can be selected.</p> <p>To be credited for answer option b., 'specific and measurable', the target should involve either:</p> <p>(1) specific nutrition criteria or limits (per g/ml/kcal) for certain product groups/categories, or specifies a portfolio (mean) target value, i.e. If the company commits to meeting an absolute measure, then this can be credited; or</p> <p>(2) relative reduction criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported).</p>		

	<p>Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.</p> <p>To be credited for answer option c., ‘timebound’, a baseline and target year must be set: e.g., an X% reduction in saturated fats by 2025 (from 2020 levels).</p> <p>e. ‘Not applicable’ can be selected if the company’s portfolio does not typically contain saturated fats (e.g., beverages such as carbonated sodas, juices, canned foods like beans, lentils or pulses, wholegrains or fruits, nuts, and vegetables). This results in this indicator being removed from the total score for this category.</p> <p><b>Rationale</b></p> <p>Diets high in saturated fat are associated with an increased risk of non-communicable diseases such as diabetes, hypertension, and cardiovascular disease. To reduce the risk of unhealthy weight gain, <a href="#">WHO suggests</a> that adults limit total fat intake to 30% of total energy intake or less. Fat consumed should be primarily unsaturated fatty acids, with no more than 10% of total energy intake coming from saturated fatty acids. The WHO suggests further reducing saturated fatty acid intake to less than 10% of total energy intake (a further reduction to &lt;5% has additional health benefits). WHO recommends replacing saturated fatty acids in the diet with polyunsaturated fatty acids, monounsaturated fatty acids from plant sources, or carbohydrates from foods containing naturally occurring dietary fiber, such as whole grains, vegetables, fruits and pulses.</p> <p>To both make the company’s portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.</p>		
<p><b>5.</b></p>  	<p>Can the company provide quantitative evidence of making progress on saturated fat reduction across its applicable portfolio within the last 3 years?</p>	a. Yes, across all relevant product categories	10
		b. Yes, across specific product categories	5
		c. Yes, for specific products only	2.5
		d. No / no information	0
		e. Not applicable	-
	<p><b>Scoring guidance:</b></p> <p>To be credited with answer option a., the company can report quantitatively on (or share evidence of) its saturated fat reduction either at the portfolio level, or at the category-level for all relevant categories. Reporting/evidence can either be year-on-year or relative to a baseline year, but must show progress to be credited. Examples can include:</p>		

	<ul style="list-style-type: none"><li>- X% reduction in saturated fat levels across the category/portfolio;</li><li>- Y% of products meeting maximum saturated fat thresholds;</li><li>- Z% of products which have achieved X% reduction in saturated fat levels.</li></ul> <p>If the company only provides examples of specific products for which it has reduced saturated fat levels, answer option c. is credited, unless it can be shown to constitute more than 20% of the company's sales.</p> <p>The reporting of illustrative statistics (e.g. "1 million tons of saturated fat removed...") will not be credited.</p> <p>'e. Not applicable' can be selected if the company's portfolio does not typically contain saturated fat (e.g. beverages such as carbonated sodas, juices, canned foods like beans, lentils or pulses, wholegrains or fruits, nuts, and vegetables). This results in this indicator being removed from the total score for this category.</p> <p><b>Rationale:</b></p> <p>Diets high in saturated fat are associated with an increased risk of non-communicable diseases such as diabetes, hypertension, and cardiovascular disease. To reduce the risk of unhealthy weight gain, <a href="#">WHO suggests</a> that adults limit total fat intake to 30% of total energy intake or less. Fat consumed should be primarily unsaturated fatty acids, with no more than 10% of total energy intake coming from saturated fatty acids. The WHO suggests further reducing saturated fatty acid intake to less than 10% of total energy intake (a further reduction to &lt;5% has additional health benefits). WHO recommends replacing saturated fatty acids in the diet with polyunsaturated fatty acids, monounsaturated fatty acids from plant sources, or carbohydrates from foods containing naturally occurring dietary fiber, such as whole grains, vegetables, fruits and pulses.</p> <p>It is important that companies systematically track and publicly report on their progress in reducing levels of saturated fats across their portfolios. Doing so helps drive results within the company and enhances accountability, both internally and externally. Quantitative measurement and reporting is important as it presents a more comprehensive and credible picture of the company's overall progress: while reductions at the product level are important, tracking/reporting at the category/portfolio level shows the relative impact of product-level reductions.</p>									
<div>6.</div> <div> </div>	<div>Has the company set a target to reduce levels of free/total sugars (or added sugars) applicable portfolio, and is it specific, measurable, and timebound?</div> <div>(Tick all that apply)</div>	<table><tr><td>a.1. Yes for free/total sugars, for all relevant product categories</td><td>5</td></tr><tr><td>a.2. Yes for free/total sugars, for some but not all relevant product categories</td><td>2.5</td></tr><tr><td>a.3. Yes for added sugars, for all relevant product categories</td><td>2.5</td></tr><tr><td>a.4. Yes for added sugars, for some but not all relevant product categories</td><td>1.25</td></tr></table>	a.1. Yes for free/total sugars, for all relevant product categories	5	a.2. Yes for free/total sugars, for some but not all relevant product categories	2.5	a.3. Yes for added sugars, for all relevant product categories	2.5	a.4. Yes for added sugars, for some but not all relevant product categories	1.25
a.1. Yes for free/total sugars, for all relevant product categories	5									
a.2. Yes for free/total sugars, for some but not all relevant product categories	2.5									
a.3. Yes for added sugars, for all relevant product categories	2.5									
a.4. Yes for added sugars, for some but not all relevant product categories	1.25									

		b. Specific and measurable	2.5
		c. Timebound	2.5
		d. No / no information	0
	<b>Scoring guidance:</b> <p>Only one 'a.' answer option can be selected.</p> <p><a href="#">According to the WHO</a>, 'Free sugars' refers to all sugars added to foods and beverages by the manufacturer as well as naturally occurring in honey, syrups, fruit juices and fruit juice concentrate, while 'total sugar' also includes intrinsic naturally occurring sugars (e.g. part of the cell structure of fruits and vegetables). The term 'Added sugar' typically excludes those naturally occurring in honey, syrups, fruit juices and fruit juice concentrate.</p> <p>If the company's target relates to 'sugar' and does not specify which definition of sugar it uses, it will be assumed to mean 'added sugar' (a.3/a.4).</p> <p>To be credited for answer option b., 'specific and measurable', the target should involve either:</p> <p>(1) specific nutrition criteria or limits (per g/ml/kcal) for certain product groups/categories, or specifies a portfolio (mean) target value), i.e. If the company commits to meeting an absolute measure, then this can be credited; or</p> <p>(2) relative reduction criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported).</p> <p>Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.</p> <p>To be credited for answer option c., 'timebound', a baseline and target year must be set: e.g., an X% reduction in sugar by 2025 (from 2020 levels).</p>		
<b>Rationale:</b> <p>Diets high in sugar are associated with unhealthy weight gain, tooth decay and an increased risk of non-communicable diseases such as diabetes, hypertension, and cardiovascular disease. The WHO and PAHO urge countries to reduce sugar consumption among adults and children. <a href="#">WHO guidelines released in 2015</a>, recommend a daily free sugar intake of &lt;10% of total energy intake.</p> <p>Industry is encouraged where possible to limit use of 'free sugars', which includes sugars naturally occurring in honey, syrups, fruit juices and fruit juice concentrate (which contributes to negative health outcomes in the same way as 'added sugar') as an ingredient, and reformulate products to reduce levels of free sugars in companies' portfolios.</p>			

	To both make the company's portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.		
<b>7</b>  	Can the company provide quantitative evidence of making progress on free/total sugars (or added sugars) reduction across its applicable portfolio within the last 3 years?	a. Yes for free/total sugars, for all relevant product categories	10
		b. Yes for free/total sugars, for some but not all relevant product categories	7.5
		c. Yes for added sugars, for all relevant product categories	7.5
		d. Yes for added sugars, for some but not all relevant product categories	5
		e. Yes, for specific products only	2.5
		f. No / no information	0
		g. Not applicable	-
	<p><b>Scoring guidance:</b></p> <p>To be credited with answer options a. or c., the company can report quantitatively on (or share evidence of) its sugar reduction either at the portfolio level, or at the category-level for all relevant categories. Reporting/evidence can either be year-on-year or relative to a baseline year, but must show progress to be credited. Examples can include:</p> <ul style="list-style-type: none"> <li>- X% reduction in free sugar levels across the category/portfolio;</li> <li>- Y% of products meeting maximum free sugar thresholds;</li> <li>- Z% of products which have achieved X% reduction in free sugar levels.</li> </ul> <p>If the company only provides examples of specific products for which it has reduced sugar levels, answer option e. is credited, unless it/they can be shown to constitute more than 20% of the company's sales.</p> <p>The reporting of illustrative statistics (e.g. "1 million tons of sugar removed...") will not be credited.</p>		

	<p>'g. Not applicable' can be selected if the company's portfolio does not typically contain sugar (e.g. bottled water, edible oils). This results in this indicator being removed from the total score for this category.</p> <p><b>Rationale:</b></p> <p>Diets high in sugar are associated with unhealthy weight gain, tooth decay and an increased risk of non-communicable diseases such as diabetes, hypertension, and cardiovascular disease. The WHO and PAHO urge countries to reduce sugar consumption among adults and children. <a href="#">WHO guidelines released in 2015</a>, recommend a daily free sugar intake of &lt;10% of total energy intake.</p> <p>Industry is encouraged where possible to limit use of 'free sugars', which includes sugars naturally occurring in honey, syrups, fruit juices and fruit juice concentrate (which contributes to negative health outcomes in the same way as 'added sugar') as an ingredient, and reformulate products to reduce levels of free sugars in companies' portfolios.</p> <p>It is important that companies systematically track and publicly report on their progress in reducing levels of sugars across their portfolios. Doing so helps drive results within the company and enhances accountability, both internally and externally. Quantitative measurement and reporting is important as it presents a more comprehensive and credible picture of the company's overall progress: while reductions at the product level are important, tracking/reporting at the category/portfolio level shows the relative impact of product-level reductions. It is also important that companies measure in terms of 'free sugars', as per WHO guidelines, since this definition is more comprehensive.</p>														
<div>8.</div> <div></div>	<p>Has the company set a target to increase the use of fruits, vegetables, nuts, and/or legumes (FVNL) in its portfolio, and is it specific, measurable, and timebound?</p> <p>(Tick all that apply)</p>	<table><tr><td>a.1. Yes, specifically for unprocessed (or minimally processed) FVNL</td><td>5</td></tr><tr><td>a.2. Yes, for FVNL defined by a different measure</td><td>2.5</td></tr><tr><td>b. Specific and measurable</td><td>2.5</td></tr><tr><td>c. Timebound</td><td>2.5</td></tr><tr><td>d. No/no information found</td><td>0</td></tr><tr><td>e. Not applicable</td><td>-</td></tr></table>	a.1. Yes, specifically for unprocessed (or minimally processed) FVNL	5	a.2. Yes, for FVNL defined by a different measure	2.5	b. Specific and measurable	2.5	c. Timebound	2.5	d. No/no information found	0	e. Not applicable	-	
a.1. Yes, specifically for unprocessed (or minimally processed) FVNL	5														
a.2. Yes, for FVNL defined by a different measure	2.5														
b. Specific and measurable	2.5														
c. Timebound	2.5														
d. No/no information found	0														
e. Not applicable	-														



**Scoring guidance:**

Only one 'a.' answer option can be selected.

The target only needs to address at least one part of 'FVNL' for credit. Targets could be in terms of the number of products in its portfolio meeting an FVNL definition, sales value or volume of such products, or average levels of FVNL across product categories/portfolio.

a.1: To be credited with this answer option, the target must specifically refer to the presence of unprocessed or minimally processed FVNL, i.e., at most, altered by processes that include removal of inedible or unwanted parts, and drying, crushing, grinding, fractioning, filtering, roasting, boiling, non-alcoholic fermentation, pasteurisation, refrigeration, chilling, freezing, placing in containers and vacuum-packaging. As per the Health Star Rating system, the minimum level should be at least 40% of the final product.

a.2: If the company uses a wider definition of FVNL content in its target, this answer option should be selected. The company must clear how it defines 'FVNL' levels/portions. This could also include pickling and other forms of preservation, pureeing, and concentrates. FVNL definitions should exclude a constituent, extract or isolate of a food e.g. peanut oil, fruit pectin and de-ionised juice.

To be credited for answer option b., 'specific and measurable', the target should involve either:

(1) specific nutrition criteria or minimums (per g/ml/kcal) for certain product groups/categories, or specifies a portfolio (mean) target value), i.e. If the company commits to meeting an absolute measure, then this can be credited; or

(2) relative increase criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported).



Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.



c. To be credited for this answer option, 'timebound', a baseline and target year must be set: e.g., an X% increase in products containing a portion of FVNL by 2025 (from 2020 levels).

e. 'Not applicable' can be selected if the company's portfolio does not typically contain FVNL (e.g. carbonates, edible oils). This results in this indicator being removed from the total score for this category.

**Rationale:**

Fruits, vegetables and legumes are essential components of a healthy diet due to their vitamin, mineral, dietary fiber and phytonutrient content, while most also being low in energy relative to many other foods. Higher consumption of FVNL is associated with reduced risk of developing cardiovascular diseases and cancer. Nuts are also important, given their high protein, fiber, unsaturated fats, and micronutrient content.

	<p>The <a href="#">WHO advises</a> that carbohydrate intake should come primarily from whole grains, vegetables, fruits and pulses, recommending a daily intake of at least 400g (5 servings) of vegetables and fruit per day. That said, the WHO also acknowledges the level of processing and method preparation when consuming FVNL: “fresh foods, or foods that are minimally processed or modified beyond the treatment necessary to ensure edibility, without added fat, sugars or salt, are preferred”. Industry is therefore encouraged where possible to increase use of FVNL as an ingredient in both new product formulations and reformulation of existing products.</p> <p>To both make the company’s portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.</p>		
<p><b>9.</b></p>  	<p>Can the company provide quantitative evidence of making progress on increasing the use of (un-/minimally processed) FVNL across its applicable portfolio within the last 3 years?</p>	a. Yes, with specific focus on unprocessed (or minimally processed) FVNL, across all relevant product categories	10
		b. Yes, with specific focus on unprocessed (or minimally processed) FVNL, across specific product categories	7.5
		c. Yes, for FVNL defined by a different measure, across all relevant product categories	7.5
		d. Yes, for FVNL defined by a different measure, across specific product categories	5
		e. Yes, for specific products only	2.5
		f. No / no information	0
		g. Not applicable	-
	<p><b>Scoring guidance:</b></p> <p>See Scoring Guidance for indicator 8 for definitions of ‘unprocessed (or minimally processed) FVNL’ and ‘FVNL defined by a different measure’.</p> <p>To be credited with answer options a. or c., the company can report quantitatively on (or share evidence of) its FVNL progress either at the portfolio level, or at the category-level for all relevant categories. Reporting/evidence can either be year-on-year or relative to a baseline year, but must show progress to be credited. Examples can include:</p> <ul style="list-style-type: none"> <li>- X% increase in levels of FVNL across the category/portfolio;</li> <li>- Y% of products containing minimum levels of FVNL.</li> </ul>		

	<p>If the company only provides examples of specific products for which it has increasing the use of FVNL, answer option e. is credited, unless it/they can be shown to constitute more than 20% of the company's sales.</p> <p>'g. Not applicable' can be selected if the company only sells product categories that would not typically contain FVNL (such as carbonated drinks). This results in this indicator being removed from the total score for this category.</p>													
	<p><b>Rationale:</b></p> <p>Fruits, vegetables and legumes are essential components of a healthy diet due to their vitamin, mineral, dietary fiber and phytonutrient content, while most also being low in energy relative to many other foods. Higher consumption of FVNL is associated with reduced risk of developing cardiovascular diseases and cancer. Nuts are also important, given their high protein, fiber, unsaturated fats, and micronutrient content.</p> <p>The <a href="#">WHO advises</a> that carbohydrate intake should come primarily from whole grains, vegetables, fruits and pulses, recommending a daily intake of at least 400g (5 servings) of vegetables and fruit per day. That said, the WHO also acknowledges the level of processing and method preparation when consuming FVNL: "fresh foods, or foods that are minimally processed or modified beyond the treatment necessary to ensure edibility, without added fat, sugars or salt, are preferred". Industry is therefore encouraged where possible to increase use of FVNL (ideally un- or minimally processed) as an ingredient in both new product formulations and reformulation of existing products.</p> <p>It is important that companies systematically track and publicly report on their progress on increasing the use of FVNL across their portfolios. Doing so helps drive results within the company and enhances accountability, both internally and externally. Quantitative measurement and reporting is important as it presents a more comprehensive and credible picture of the company's overall progress: while increases at the product level are important, tracking/reporting at the category/portfolio level shows the relative impact of product-level increases.</p>													
<div>10.</div> <div></div>	<p>Has the company set a target to increase the number of products containing significant levels of whole grains in its applicable portfolio, and is it specific, measurable, and timebound?</p> <p>(Tick all that apply)</p>	<table><tr><td>a.1. Yes, specifically for 'whole grain products' (i.e. containing &gt;50% whole grains), or minimally processed whole grains (&gt;25%)</td><td>5</td></tr><tr><td>a.2. Yes, for products containing whole grains (&gt;25%)</td><td>2.5</td></tr><tr><td>b. Specific and measurable</td><td>2.5</td></tr><tr><td>c. Timebound</td><td>2.5</td></tr><tr><td>d. No / no information found</td><td>0</td></tr><tr><td>e. Not applicable</td><td>-</td></tr></table>	a.1. Yes, specifically for 'whole grain products' (i.e. containing >50% whole grains), or minimally processed whole grains (>25%)	5	a.2. Yes, for products containing whole grains (>25%)	2.5	b. Specific and measurable	2.5	c. Timebound	2.5	d. No / no information found	0	e. Not applicable	-
a.1. Yes, specifically for 'whole grain products' (i.e. containing >50% whole grains), or minimally processed whole grains (>25%)	5													
a.2. Yes, for products containing whole grains (>25%)	2.5													
b. Specific and measurable	2.5													
c. Timebound	2.5													
d. No / no information found	0													
e. Not applicable	-													

**Scoring guidance**

Only one 'a.' answer option can be selected.

Targets could be in terms of the number of products in its portfolio meeting a whole grains definition, sales value or volume of such products, or average levels of whole grains across product categories/portfolio (above a minimum level, see below).

A target cannot be credited unless the company can confirm that the definition of 'whole grains' it uses stipulates that the three elements of the kernel (i.e. bran, germ and endosperm) must be present in their original proportions. This means that refined grains are excluded.

a.1: To be credited, the company's target must specifically relate either to:

1. Products that can be defined as 'Whole grain products', meaning it contains at least 50% whole grain ingredients based on dry weight (as per the [Whole Grain Initiative definition](#));
2. Products that contain a minimum of 25% minimally processed whole grains (i.e. have not undergone reconstitution or extrusion).

a.2: Companies can be credited if the targets relate to products that contain a minimum of 25% (which is the minimum level for which a product should carry a whole grains claim, according to the [latest recommendations of the Whole Grain Council](#)).

To be credited for answer option b., 'specific and measurable', the target should involve either:

(1) specific nutrition criteria or minimums (per g/ml/kcal) for certain product groups/categories, or specifies a portfolio (mean) target value), i.e. If the company commits to meeting an absolute measure, then this can be credited; or



(2) relative increase criteria from a specified baseline value (i.e. if the target is a percentage change, the baseline level must be reported).

Moreover, the target must be externally verifiable, which means the target does not rely on company-internal definitions/information that is not on the public domain for verification.


c. To be credited for this answer option, 'timebound', a baseline and target year must be set: e.g., an X% increase in products containing a meaningful portion of whole grains by 2025 (from 2020 levels).

d. 'Not applicable' can be selected if the company's portfolio is not suited to typically contain whole grains (e.g., carbonated drinks, dairy). This results in this indicator being removed from the total score for this category.

**Rationale**

	<p>'Whole grains' refers to ingredients such as maize, millet, oats, wheat, and brown rice, containing the naturally-occurring components of the kernel (i.e. bran, germ and endosperm) - these elements must be present in their original proportions to be considered 'whole grain'.</p> <p>Whole grains are an important source of dietary fiber, protein, as well as micronutrients and phytochemicals. Diets high in whole grains improve digestive health, can be associated with maintaining a healthy weight, and are associated with a reduced risk of non-communicable diseases such as type-2 diabetes, hypertension, and cardiovascular disease and increased overall health.</p> <p>The <a href="#">WHO advises</a> that carbohydrate intake should come primarily from whole grains, vegetables, fruits and pulses, recommending a daily intake of 25g of naturally-occurring dietary fiber per day for adults. However, average dietary intake of whole grains in almost all countries is well below recommended levels. Industry is encouraged where possible to increase wholegrains as an ingredient, reformulate products and improve accessibility and affordability of products contributing toward positive nutrition.</p> <p>The <a href="#">WHO also acknowledges</a> the level of processing when consuming whole grains: "there is evidence to suggest that the naturally occurring structure of intact whole grains contributes to its observed health effects, minimal processing of whole grains beyond that necessary to ensure edibility is preferred." During the milling process, constituent parts (bran, germ and endosperm) may be separated and recombined later in the product development process (known as recombination or reconstitution).</p> <p>To both make the company's portfolio development commitments more concrete and to enhance accountability (both internally and externally) for its success, companies should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.</p>		
<b>11.</b>  	Can the company provide quantitative evidence of making progress on increasing the number of products containing significant levels of (minimally processed) whole grains across its applicable portfolio, within the last 3 years?	a. Yes, specifically for 'whole grain products' (i.e. containing >50% whole grains), or minimally processed whole grains (>25%), across all relevant product categories	10
		b. Yes, specifically for 'whole grain products' (i.e. containing >50% whole grains), or minimally processed whole grains (>25%), across specific product categories	7.5
		c. Yes, for products containing whole grains (>25%), across all relevant product categories	7.5
		d. Yes, for products containing whole grains (>25%), across specific product categories	5

	e. Yes, for specific products only	2.5
	f. No / no information	0
	g. Not applicable	-
<p><b>Scoring guidance:</b></p> <p>See Scoring Guidance for indicator 10 for definitions of ‘whole grain products’ and ‘minimally processed whole grains (&gt;25%)’.</p> <p>To be credited with answer options a. or c., the company can report quantitatively on (or share evidence of) increasing the number of products containing significant levels of (minimally processed) whole grains either at the portfolio level, or at the category-level for all relevant categories. Reporting/evidence can either be year-on-year or relative to a baseline year, but must show progress to be credited. For example, X% increase in products containing minimum levels of whole grains.</p> <p>If the company only provides examples of specific products for which it has increased the amount of whole grains it contains, answer option e. is credited, unless the product(s) can be shown to constitute more than 20% of the company’s sales.</p> <p>‘g. Not applicable’ can be selected if the company only sells product categories that would not typically contain whole grains (such as carbonated drinks, dairy). This results in this indicator being removed from the total score for this category.</p>		
<p><b>Rationale:</b></p> <p>‘Whole grains’ refers to ingredients such as maize, millet, oats, wheat, and brown rice, containing the naturally-occurring components of the kernel (i.e. bran, germ and endosperm) – these elements must be present in their original proportions to be considered ‘whole grain’. Whole grains are an important source of dietary fiber, protein, as well as micronutrients and phytochemicals. Diets high in whole grains improve digestive health, can be associated with maintaining a healthy weight, and are associated with a reduced risk of non-communicable diseases such as type-2 diabetes, hypertension, and cardiovascular disease and increased overall health.</p> <p>The <a href="#">WHO advises</a> that carbohydrate intake should come primarily from whole grains, vegetables, fruits and pulses, recommending a daily intake of 25g of naturally-occurring dietary fiber per day for adults. However, average dietary intake of whole grains in almost all countries is well below recommended levels. Industry is encouraged where possible to increase wholegrains as an ingredient in their portfolios and offer more products containing significant levels (i.e more than 25%, ideally more than 50%) of whole grains.</p> <p>It is important that companies systematically track and publicly report on their progress on increasing the use of whole grains across their portfolios. Doing so helps drive results within the company and enhances accountability, both internally and externally. Quantitative measurement and reporting</p>		

	is important as it presents a more comprehensive and credible picture of the company's overall progress: while increases at the product level are important, tracking/reporting at the category/portfolio level shows the relative impact of product-level increases.		
<b>12.</b> 	If the company fortifies products, does it explicitly commit to follow the following principles?  (Tick all that apply)	a.1 Not to fortify or enrich products that are unhealthy, according to the thresholds of an (inter)nationally recognised NPM	5
		a.2 Not to fortify or enrich products that are unhealthy, according to the company's own thresholds	2.5
		a.3 Other restrictions relating to nutrition, without specific nutrition standards	1.25
		b. CODEX CAC/GL 9-1987 and/or the WHO/FAO 'Guidelines on Food Fortification with Micronutrients'	5
		c. No / no information	0
		d. Not applicable (the company does not fortify any of its products)	-
	<b>Scoring guidance:</b>  Only one 'a.' answer option can be selected.  a.1/a.2: To be credited, the company should clearly state in either its external reporting or in an internal policy or process document that it commits to not fortify or enrich products that are defined as 'unhealthy' (i.e., meeting maximum thresholds for fat, salt, and sugar, etc.), according to a formal nutrition standard, based on either an (inter)nationally-recognised NPM (see B3) or its own established nutrition criteria.  a.3: Examples of 'other restrictions' include the formal exclusion of certain product categories from fortification (e.g. confectionary).  For answer options a.1,2,3, the use of fortified staples in products can be exempted from the company's policy/commitment. I.e. the use of fortified staples in products not meeting healthiness criteria is permitted.  b. To be credited, the company should explicitly state in either its external reporting or in an internal policy or process document that it follows either CODEX CAC/GL 9-1987 and/or the WHO/FAO 'Guidelines on Food Fortification with Micronutrients'. If only one guidance document is referenced, credit can still be awarded.		

	<p>d. In the case companies do not sell fortified products, this indicator is not applicable and therefore not scored.</p> <p><b>Rationale:</b></p> <p>ATNI encourages companies to only fortify foods in accordance with relevant guidance and select products or categories with underlying nutritional quality or defined as healthy i.e., low in fat, salt, sugar. Fortifying products that contain high levels of nutrients of concern can result in a <a href="#">“health halo effect”</a> that leads consumers to misunderstand and overestimate their nutritional quality and healthfulness, leading to higher consumption of such products, and thereby greater risk of experiencing adverse health effects.</p> <p>Meanwhile the CODEX CAC/GL 9-1987: GENERAL PRINCIPLES FOR THE ADDITION OF ESSENTIAL NUTRIENTS TO FOODS and <a href="#">WHO/FAO Guidelines on Food Fortification with Micronutrients</a> provide concrete guidance on the appropriate selection and levels of micronutrients to use in fortification.</p>		
13.	Can the company provide evidence that it uses fortified staple(s) (salt, wheat/maize flour, edible oil, rice, or milk) as an ingredient in its products consistently in one or more markets?	a. Yes, in three or more markets (or in the market(s) that constitute at least 50% of its global sales)	-
		b. Yes, in two markets	-
		c. Yes, in one market	-
		d. No / no information	-
		e. Not applicable	-
	<p><b>Scoring guidance</b></p> <p>To be considered for scoring, the fortified staple used as an ingredient in the company’s products must be: 1) widely consumed and fortifiable (i.e. processed or aggregated along a value chain where fortification can occur); 2) comply with mandated or voluntary fortification requirements by governments or inter-governmental bodies, and 3) the added micronutrient(s) fill a nutrient gap identified by public health authorities. In general, these conditions are satisfactory if the staple in question is part of a Large-Scale Food Fortification (LSFF) program, a database of which can be found here: <a href="https://fortificationdata.org/map-population-coverage-of-fortified-food-vehicle/">https://fortificationdata.org/map-population-coverage-of-fortified-food-vehicle/</a>.</p> <p>Examples could include iodized salt, Iron-fortified wheat fortified flour, Iron or Zinc fortified maize flour, or edible oil fortified with Vitamin A or D.</p>		



	<p>Credit is only given if the company can show that, as policy, it uses the fortified version of a staple as an ingredient for <i>all</i> relevant products in a particular market. For example, if the company only uses iodized salt, and never non-iodized salt, in a market. If there are exceptions for use in certain products, a clear rationale must be provided.</p> <p>Evidence can include a clear policy statement, internal documentation, standard operating procedures, etc.</p>		
	<p><b>Rationale</b></p> <p>The consumption of processed packaged foods is rising globally, yet deficiencies in micronutrients remain to be a public burden in most economies. Large-scale food fortification (LSFF) programs, which use commonly consumed industrially produced products such as salt, oils, and cereal flours as vehicles to increase the supply of micronutrients, are <a href="#">widely recognised</a> as a cost-effective public health intervention to reduce micronutrient deficiencies, such as those of <a href="#">iodine</a>, Vitamins A and D, folate, and Iron, among others.</p> <p>Companies can choose to use fortified staples produced through these programs as ingredients in their products, which can in turn help to address key micronutrient deficiencies in these respective markets.</p>		
14.	<p>[Unscored] If fortified staples are used as ingredients the company's products, does the company have any quality control or assurance methods in place to determine whether the levels of micronutrient(s) are sufficient in the fortified staples used?</p> <p>Please describe the processes and provide supporting evidence.</p>	a. Yes, if procuring fortified staples B2B	-
		b. Yes, if the company fortifies staples itself	-
	<p><b>Scoring guidance</b></p> <p>Quality assurance (QA) refers to activities to ensure that the production of fortified staples contain adequate micronutrient levels, are of high quality, and are safe to consume. The focus is on the manufacturing process (including fortification).</p> <p>Quality control (QC) activities are concentrated on the finished product. They verify that fortified foods contain adequate micronutrient levels, are of high quality, and are safe to consume before marketing them to consumers.</p> <p>Companies should be able to show proof of method(s) in place to check compliance with internal or external fortification standards e.g., by sampling products and record keeping compliance</p> <p>For background information see the WHO Guidelines on Food Fortification with Micronutrients: page 186-191, <a href="https://cdn.who.int/media/docs/default-source/micronutrients/gff-part-4-en.pdf?sfvrsn=cdd21d48_2">https://cdn.who.int/media/docs/default-source/micronutrients/gff-part-4-en.pdf?sfvrsn=cdd21d48_2</a></p>		

	<p><b>Rationale</b></p> <p>Large-scale food fortification (LSFF) programs for staple products, whether mandated through regulation or through voluntary standards, have been found to frequently <a href="#">experience low levels of compliance</a> and <a href="#">limited enforcement in many markets</a>.</p> <p>As major procurers of staple foods, food and beverage manufacturers can serve as an important lever in improving the overall quality of fortified products available to consumers on the market. This can be done by driving improved compliance or implementing quality control procedures for fortification practices e.g., ordering adequately fortified staples or premix and testing quality.</p> <p>This indicator seeks to assess whether the company takes measures to ensure its accountability for the quality of its fortified food products throughout stages of the supply chain.</p>		
15.	<p>[Unscored] If selling fortified products, does the company have quality control or assurance method(s) in place to verify the final micronutrient levels in its product(s) at the point of consumption, factoring in the variability of added vitamins and minerals?</p>	-	-
	<p><b>Scoring guidance</b></p> <p>Companies should be able to show proof of methods to verify the final micronutrient levels in its product(s) at the point of consumption, factoring in the variability of added vitamins and minerals. For example, through laboratory stability tests to assess physical and chemical stability of products, using 5-10 product samples from a batch over X period on the market. Evidence could include record keeping or process documents of checking compliance. Alternatively, companies could show proof of using theoretical calculations on the possible losses due to processing (i.e., cooking, storage) and/or finished product specifications.</p> <p>Quality assurance (QA) refers to activities to ensure that the production of fortified staples contain adequate micronutrient levels, are of high quality, and are safe to consume. The focus is on the manufacturing process (including fortification).</p> <p>Quality control (QC) activities are concentrated on the finished product. They verify that fortified foods contain adequate micronutrient levels, are of high quality, and are safe to consume before marketing them to consumers.</p> <p>For background information see the WHO GUIDELINES ON FOOD FORTIFICATION WITH MICRONUTRIENTS: page 186-191, <a href="https://cdn.who.int/media/docs/default-source/micronutrients/gff-part-4-en.pdf?sfvrsn=cdd21d48_2">https://cdn.who.int/media/docs/default-source/micronutrients/gff-part-4-en.pdf?sfvrsn=cdd21d48_2</a>.</p>		
	<p><b>Rationale</b></p> <p>Packaged food products are exposed to a variety of conditions throughout the supply chain before reaching the market which can potentially affect or degrade micronutrients (for example, exposure to high levels of heat, humidity, or light). <a href="#">For these reasons it is vital to carry out shelf-life tests for</a></p>		

	<a href="#">fortified products</a> , or, at minimum, theoretical calculations on the possible losses due to processing. This is particularly relevant if the company places a nutrition and/or health claim on its fortified products.		
16.	[Unscored] Does the company have a position on the link between highly processed foods and adverse health impacts and if so, a strategy to address this link?	Yes	-
		No	-
		No information	-
	<p><b>Rationale</b></p> <p>Food processing generally refers to any action that alters food from its natural state, such as drying, freezing, milling, canning, or adding salt, sugar, fat, or other additives for flavor or preservation. Food processing serves multiple functions, it makes inedible foods edible and safe, extends shelf life while retaining nutrients, alters nutrient composition, enhances taste and texture for better palatability, and increases overall convenience in consumption and preparation.</p> <p>However, attention is growing among an increasingly diverse array of stakeholders, including medical professionals, academics, civil society, consumers, financial institutions, investors, public health authorities, and inter-governmental bodies, on the potential health impacts of highly processed foods.</p> <p>For more information, please see the ATNI (forthcoming)</p> <p>ATNI will continue to review evidence on levels and types of processing and related classification systems but will await an evidence-based and validated measure for exploratory use in ATNI's Product Profile assessments.</p> <p>The purpose of this indicator is to gauge companies' thinking and preliminary actions (if any) taken to mitigate the possible adverse health outcomes associated with the consumption of highly processed foods, based on the current evidence.</p>		

### B3: Nutrient profiling for reporting purposes


**Category weighting:** 5%


**Total possible score:** 30

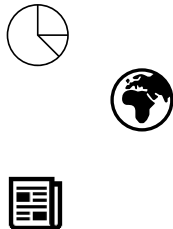
**Category-specific multiplier:** Portfolio Scope Multiplier




(Indicator 2)

Indicator No.	Indicator question	Answer options	Score
1. 	What type of NPM does the company use specifically to report on the percentage of products/sales that meet a definition of 'healthier'?	a. An internationally recognised / government endorsed NPM*	10
		b. The company's own NPM, which uses per 100g/ml/kcal as the reference unit for all applicable nutrients	5
		c. The company's own NPM, which uses per serving/portion as the reference for at least some (or all) nutrients	2.5
		d. The company's own NPM or similar tool, with products able to qualify as 'healthier' without meeting maximum thresholds for nutrients to limit	1.25
		e. No reporting on products meeting 'healthier' definition / no information	0
	<p><b>Scoring guidance</b></p> <p>If the company uses an NPM only for internal use (i.e. reformulation) and does not use it for external reporting, this is not considered relevant for this indicator.</p> <p>For this indicator, the primary metric the company uses to report on the percentage of products/sales is considered, i.e. the metric which appears most prominently in its annual/responsibility reports and websites.</p> <p>If the company has measured its portfolio's healthiness using an internationally recognised / government endorsed NPM specifically for the purposes of benchmarking only and reports on this, this is not considered for this indicator unless the company has adopted this definition of 'healthier' as its primary reporting metric.</p> <p><b>Answer option a.:</b> To be credited, the company must use an internationally recognised / government endorsed NPM that has a clear threshold for defining 'healthier'. It must use the same product categorisations, thresholds, cut-off points, and algorithm as the original model. The model must be used as originally intended, i.e. strictly following its application guidelines, without notable exceptions. If adaptations are made, it does not qualify for answer option a.</p>		

	<p><b>Answer option b.:</b> To be credited, the cut-off points or thresholds for each nutrient/food component must be calculated on a per 100g/ml/kcal basis, without exceptions. If more than one cut-off point or threshold are based on per serving/portion, answer option c. is selected.</p> <p>To be credited with <b>answer options a. to c.,</b> at minimum, the system used by the company <i>must</i> include thresholds for nutrients to limit (energy, saturated fat, free/added sugars, and salt/sodium, as applicable). Systems that only consider nutrients/ingredients to encourage (such as whole grains, fruits/vegetables/nuts/legumes, etc), or allow products to qualify that do not meet maximum thresholds for nutrients to limit, will be credited with <b>answer option d.</b></p> <p>*For a full list of government endorsed NPMs please see this scientific review from 2018: <a href="https://doi.org/10.1093/advances/nmy045">https://doi.org/10.1093/advances/nmy045</a>, Table 3; or updated version from 2023: <a href="https://doi.org/10.1016/j.advnut.2023.08.013">https://doi.org/10.1016/j.advnut.2023.08.013</a></p> <p><b>Rationale</b></p> <p>In order to enable stakeholders to better hold the company accountable for its impact on consumers’ diets and motivate further improvements in the healthiness of its portfolio, it is important that the company publicly discloses the proportion of its products (and, ideally, sales) are meet a robust definition of ‘healthier’.</p> <p>Companies are advised to make use of an internationally recognised / government endorsed NPM to define ‘healthier’ products, given that these models are based on independent scientific evidence related to public health, undergo a thorough and extended peer-review process, and include comprehensive documentation of the governance, food-category criteria, and nutrient thresholds in the public domain.</p> <p>An NPM that uses ‘per 100g/ml/kcal’ as the reference unit for its nutrient thresholds is generally considered to be more useful, given that this is a standardised and more objective measure to ensure comparability between different products and models, and is the basis for all internationally recognised models. Serving sizes tend not to be standardised, which is difficult due to the unique characteristics of many products, as well as the fact that consumption patterns vary for individual consumers and across eating occasions, cultures, and traditions.</p>												
2.	<p><b>[Portfolio scope multiplier]</b> To what extent does the company apply the NPM specifically for reporting purposes to its full portfolio?</p> 	<table><tr><td>a. Full portfolio (&gt;≈95% sales)</td><td>1.0</td></tr><tr><td>b. Most of portfolio (&gt;≈70%)</td><td>0.75</td></tr><tr><td>c. Substantial part of portfolio (&gt;≈40%)</td><td>0.5</td></tr><tr><td>d. Limited part of portfolio (&gt;≈10%)</td><td>0.25</td></tr><tr><td>e. Specific brands/product lines</td><td>0</td></tr></table>	a. Full portfolio (>≈95% sales)	1.0	b. Most of portfolio (>≈70%)	0.75	c. Substantial part of portfolio (>≈40%)	0.5	d. Limited part of portfolio (>≈10%)	0.25	e. Specific brands/product lines	0	
a. Full portfolio (>≈95% sales)	1.0												
b. Most of portfolio (>≈70%)	0.75												
c. Substantial part of portfolio (>≈40%)	0.5												
d. Limited part of portfolio (>≈10%)	0.25												
e. Specific brands/product lines	0												

		f. No reporting on portfolio meeting specific 'healthier' criteria according to a formal NPM	0
	<p><b>Scoring guidance:</b></p> <p>The portfolio scope refers to the extent of the company's portfolio that is within the scope of this Index (i.e. categories like Specialised Nutrition, Plain Tea/Coffee, B2B ingredients etc, can be excluded). If additional product categories are included, this should not affect the selection for this indicator.</p> <p>If the company limits the application of the NPM for reporting purposes to its portfolio in some way, ATNI can use EMI product category data to estimate the percentage of total sales, or, if the restriction does not correspond to EMI product categories, the company is expected to provide the sales data itself.</p> <p>If the company limits the application of the NPM to a specific part of its product portfolio, there must still be scope within this category/selection to distinguish between healthier/less healthy products, either to guide reformulation to improve product healthiness, or guide consumers towards healthier options. In other words, if the NPM is <i>only</i> applied to a specific product category (or product categories) that would generally be classified as 'healthier' by the NPM (e.g. bottled water according to HSR), answer option e. would be selected.</p>		
	<p><b>Rationale</b></p> <p>In order to provide external stakeholders with a clear indication of the overall healthiness of the company's portfolio, it is important that companies apply the NPM for reporting purposes to their full food and beverage portfolios aimed at the general consumer. Restricting the scope of application may result in a skewed perception of the overall healthiness of the company's portfolio for external stakeholders, and could limit the company's incentive to reformulate to improve the healthiness of products or increase sales of healthier products in the categories not covered.</p>		
<p>3.</p> 	<p>If the company has benchmarked its definition of 'healthier' against at least one internationally recognised / government endorsed NPM, or directly uses this kind of model for reporting purposes, does it disclose* the following details about how it applied the model to its portfolio?</p> <p>(Tick all that apply)</p>	a. Which product categories were included/excluded	2
		b. Which markets were included/excluded in the assessment	2
		c. How it categorised its products with the model's product classification system	2
		d. Whether it is calculated 'as sold' or 'as prepared/consumed' (and, if so, how)	2
		e. Whether the reporting/comparison is in terms of sales volumes, sales value, or other	2

		f. Company reports directly using an internationally recognised / government endorsed NPM OR benchmarks its own definition against one, but no details are disclosed	0
		g. No evidence of benchmarking against internationally recognised / government endorsed NPM or using one for reporting	0
<p><b>Scoring guidance:</b></p> <p>By “benchmarking”, ATNI refers to the act of calculating the % sales derived from products meeting ‘healthier criteria’ according to its own NPM and of one or more internationally recognised, government endorsed models, and comparing the results.</p> <p>If the company only uses its own NPM to define ‘healthier’ for reporting purposes and has not benchmarked this definition against an internationally recognised / government endorsed NPM and published the results, ‘g.’ is selected. Please note that a similar set of questions are asked regarding the transparency of the company’s own NPM in the subsequent indicator.</p> <p>If the company directly uses an internationally recognised / government endorsed NPM to report on healthier sales, this is credited in indicator 1 (and indicator 4 is ‘Not applicable’) – this indicator is still assessed, since it is important that the company is transparent* about how it applied the NPM to its portfolio.</p> <p>a. The company must be clear which specific product categories in its portfolio are/were excluded from the calculation (if any), and whether it included any categories that would not typically be assessed by the model.</p> <p>b. If the company samples a selection of its markets to apply the model to, it should be clear which specific markets were included. If the markets selected are limited relative to the company’s overall geographic scope, the Geographic Multiplier is applied.</p> <p>c. While most models have guidelines for how to classify products into different product categories (which can significantly affect how the nutrient profile is calculated for that product/subcategory of products), where there is some room for interpretation and the company has made a judgement call, this should clearly be disclosed. Ideally, a full list of products or subcategories assessed and how they were categorised would be publicly available.</p> <p>d. Whether the model is applied to the product ‘as sold’ or ‘as prepared/consumed’ can make a significant difference to the nutrient profile calculation of that product. While most guidelines will specify which approach should be taken, if the company decides to take a different approach, this must clearly be disclosed. If ‘as prepared/consumed’ is chosen, it must further specify <i>how</i> (e.g. if anything other than water is used), and how the conversion to the reference unit is applied.</p>			

	<p>e. Whether the reporting/comparison is weighted according to sales volumes, sales value, or other metric (e.g. portfolio offering) can also significantly affect the interpretation of the results. It should be clear what metric the company used.</p> <p>*For this indicator, while companies are encouraged to publish this information on the public domain for full transparency (see Rationale), if the company would be willing to share this information with external parties upon request (without NDAs), credit can be given per answer option. In such scenarios, the Disclosure Multiplier would still be set to 'No / Partially'. To demonstrate this, the company must share this evidence without NDA, otherwise no credit can be given.</p>														
	<p><b>Rationale</b></p> <p>As explained in the Rationale for B3 Indicator 1, companies will ideally use an internationally recognised/government endorsed NPM to report on the healthiness of its sales. If the company still prefers to report (and set KPIs, etc) against its own NPM (developed by the company), companies are strongly encouraged to benchmarking it against one or more internationally recognised/government endorsed NPMs and publish the results, in order to be transparent about the degree of alignment with these NPMs.</p> <p>While most internationally recognised/government endorsed models have clear guidelines specifying how the model should be applied, there can still be room for interpretation of certain rules which can result in the models being applied or reported on different ways by different companies, all of which can significantly affect the final result and comparability of portfolios. As a result, it is critical that companies are as transparent as possible about how the models were applied to its portfolio, so that external stakeholders can precisely understand how the results were calculated and, in theory, to enable them to replicate the company's approach in order to externally verify and compare.</p>														
4. 	<p>Which details about the company's NPM and definition of 'healthier' are disclosed on the public domain?</p> <p>(Tick all that apply)</p>	<table><tr><td>a. The thresholds for each nutrient or food component, per product category</td><td>2.5</td></tr><tr><td>b. Product category definitions</td><td>2.5</td></tr><tr><td>c. Which specific product categories in the company's portfolio are included and excluded</td><td>2.5</td></tr><tr><td>d. All other details for how products can qualify as being defined as 'healthier'</td><td>2.5</td></tr><tr><td>e. No disclosure / No definition of 'healthier' / no information</td><td>0</td></tr><tr><td>f. Not applicable (company uses an internationally recognised or government endorsed NPM)</td><td>-</td></tr></table>	a. The thresholds for each nutrient or food component, per product category	2.5	b. Product category definitions	2.5	c. Which specific product categories in the company's portfolio are included and excluded	2.5	d. All other details for how products can qualify as being defined as 'healthier'	2.5	e. No disclosure / No definition of 'healthier' / no information	0	f. Not applicable (company uses an internationally recognised or government endorsed NPM)	-	
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b. Product category definitions	2.5														
c. Which specific product categories in the company's portfolio are included and excluded	2.5														
d. All other details for how products can qualify as being defined as 'healthier'	2.5														
e. No disclosure / No definition of 'healthier' / no information	0														
f. Not applicable (company uses an internationally recognised or government endorsed NPM)	-														



	<p><b>Scoring guidance</b></p> <p>If the company is credited with answer option a. in indicator 1 (i.e. it uses an internationally recognised and government endorsed NPM (without modification)), answer option d. is selected, which removes the indicator from the scoring for this sub-category.</p> <p><b>Answer option a.:</b> A threshold for nutrients or a food components (e.g., sodium, sugar, or saturated fat), refers to a value, expressed as (m)g per 100g/ml/kcal/serving, that indicates the maximum level of a nutrient to limit in a product, or minimum level if referring to nutrients or food components to encourage.</p> <p><b>Answer option b.:</b> Companies ideally use product category definitions made and used by government authorities or international standards like Codex. If the company decides to define and use its own product categories it is important the definitions are consistently applied, with a uniform nomenclature and allowing for unambiguous classification of all the products in the portfolio.</p> <p><b>Answer option c.:</b> The company must clearly state which of its product categories it applies the NPM to for reporting purposes. This can be list of product categories, a statement that it applies to the company's whole portfolio or the whole portfolio with specific exceptions, or a statement that it applies to all product categories covered by a specific internationally recognised and government endorsed NPM (such as HSR), with exceptions or additions.</p> <p><b>Answer option d.:</b> All details to determine/calculate whether a product meets the 'healthy' threshold/criteria must be clearly disclosed on the public domain, in order to enable replicability by external parties. If there are multiple routes by which a product can meet the definition of 'healthier' or the system requires an algorithm to calculate the healthiness of a product and whether it meets the threshold for 'healthier', all details of this algorithm must be disclosed. If only maximum or minimum thresholds must be met for a product to qualify, this should be clearly stated on the public domain and any other conditions for qualifying must clearly be stated.</p>
	<p><b>Rationale</b></p> <p>Given the importance of the company's definition of 'healthier' to its many possible applications, it is essential that companies are fully transparent about all aspects of the NPM that they use and how 'healthier' is defined. This allows scrutiny by public health experts and other key stakeholders, which enables them to draw conclusions about the robustness of a company's definition of 'healthier' and the extent to which their product ranges and portfolios can contribute to healthier diets.</p>

# Category C: Affordability

**Category weighting:** 15%

**Total possible score:** 50

**Category-specific multiplier:** Score from indicator 1 applied to subsequent indicators  automatically.

Category C assesses whether companies have developed strategies/approaches ensuring that at least part of their 'healthier' product portfolios are made affordable and/or accessible to lower-income consumers and the robustness of these approaches.

The specific approach to address 'affordable nutrition' will depend on the company and the nature of the specific products in question, as well as the market-specific context. Examples of approaches, identified in previous Indexes and [literature on this topic](#), include:

## *Cost reduction/management (and adjusting price accordingly)*

- Innovation strategies (to identify low-cost, high nutritional value ingredients, processes; reducing waste, etc);
- Local sourcing, local manufacture, local distribution;
- Achieving economies of scale in production;
- Management systems for cost fluctuations (e.g. currency, inflation).

## *Pricing policies*


- Taking existing affordable products, and reformulating to make healthy (while maintaining same price);
- Ensuring that for existing healthy products, avoiding premium mark-ups;
- Ensuring small package sizes for a lower price per purchasable unit;
- Benchmarking – setting price below market average for category;
- Cross subsidisation of margins from premium products.




## *Distribution strategies*



- Locally adapted distribution methods e.g. street markets, mobile street vendors, door-to-door distributors, micro-entrepreneurs, etc.

Given the lack of international guidance on this topic, rather than assessing the quality or effectiveness of the approach applied by the company (beyond the 'healthiness' of the products in question), the indicators in this category assess the robustness of the company's thinking on this topic: the extent to which key concepts are defined/determined, the scope of the strategy/approach, whether targets/KPIs are set, and how systematically the company reports on its progress.




To be credited in this category, the company must show clear evidence of a deliberate approach to ensuring that at least part of its 'healthier' product portfolio (according to a formal definition, as credited in indicator 1) are priced to specifically reach lower income consumers in at least one market. In addition to meeting clear nutrition criteria, the company must also be able to show how it considers the products in question to be 'affordable' (as assessed in indicator 2).




Indicator No.	Indicator question	Answer options	Score
1. 	If the company has an affordability strategy or approach specifically for 'healthier' products (i.e. 'affordable nutrition' strategy/approach), what nutrition criteria is used / do products meet?  [Please read Scoring guidance carefully]	a. Meeting 'healthier' criteria defined by an internationally recognised / government endorsed NPM (or equivalent)*	1
		b. Meeting 'healthier' criteria developed by the company	0.66
		c. Products characterised by the company as 'healthier' (not according to formal nutrition criteria)	0.33
		d. No nutrition criteria / no information	0
	<p><b>Scoring guidance:</b></p> <p>The score derived from this indicator is used as a 'multiplier' for indicators 2, 3, 4, and 5.</p> <p>This indicator specifically concerns the classification of 'healthier' products that are part of the company's 'affordable nutrition' strategy/approach (which is assessed throughout this category). This could be a specific set of criteria developed specifically for its 'affordable nutrition' strategy, or it could be the same definition of 'healthier' used for other purposes (such as product (re)formulation and/or reporting, as assessed in B3). If the latter, it must be clear that this definition is used for products participating in the 'affordable nutrition' strategy.</p> <p>Affordability strategies that do not involve a focus on nutritious products are not considered relevant, and will therefore assigned <b>answer option d.</b></p> <p>Similarly, non-commercial approaches (i.e. product donations, philanthropic programs) are considered out of scope for this Index. The strategy must be commercial: any consumer must be able to purchase the product.</p> <p>For <b>answer option a.</b> to be selected, the products in question must all be shown to meet a definition of 'healthier' defined by an internationally recognised/government-endorsed NPM*: for example, HSR &gt;3.5. Ideally, this requirement should be a core part of the company's affordable nutrition strategy. If the company can show that its own definition of healthy (as used in its affordable nutrition strategy/approach) is either derived</p>		

	<p>directly from an internationally-recognised/government-endorsed NPM, or can be shown to be within &lt;10% deviation of one, for example by benchmarking its definition of 'healthier', this answer option can be credited.</p> <p>If the products in question must (or can be shown that they) meet the company's own definition of 'healthier', but not a stricter model, then <b>answer option b.</b> is selected. The definition must, at minimum, include thresholds for nutrients of concern (i.e. sodium, sugar, and saturated fats).</p> <p>* For a full list of government-endorsed NPMs please see this scientific review from 2018: <a href="https://doi.org/10.1093/advances/nmy045">https://doi.org/10.1093/advances/nmy045</a>, Table 3; or updated version from 2023: <a href="https://doi.org/10.1016/j.advnut.2023.08.013">https://doi.org/10.1016/j.advnut.2023.08.013</a>, Table 3 by Labonté and colleagues.</p> <p><b>Rationale:</b></p> <p>Processed foods and beverages constitute an ever-increasing proportion of lower income consumers' diets around the world, with rates of malnutrition often being disproportionately high among these groups. To improve their diet quality, lower income consumers must therefore have access to nutritious products at affordable prices, especially since food represents the largest share of lower-income consumers' expenditure.</p> <p>The nutritious quality of the products included in the company's affordability strategy/approach is therefore critical, if it is to be beneficial for public health: products that are affordable but <i>not</i> healthy (according to a formal definition) risk exacerbating malnutrition in lower income groups. Companies must therefore ensure that these products meet a formal definition of 'healthier', ideally one that is internationally recognised and/or government endorsed, in order to ensure a positive impact on lower income consumers' diets.</p>		
<p>2.</p>   	<p>With regards to the company's 'affordable nutrition' strategy/approach, does the company have a formal process for determining, calculating, or defining 'affordability' and lower income consumers?</p> <p>(Tick all that apply)</p>	a. Yes, clear process for determining, calculating, or defining 'affordability' of its products	5
		b. Yes, using formal definitions of 'lower income consumers'	5
		c. No / no information	0
	<p><b>Scoring guidance</b></p> <p>Only the affordability strategy/approach with specific application to 'healthier' products (i.e. 'affordable nutrition') will be assessed in this indicator. Evidence for affordability strategies <i>in general</i>, without a specific or disproportionate application to healthy products, is not considered relevant for this or subsequent indicators.</p> <p>To be credited with <b>answer option a.</b>, the company may provide evidence of the following:</p> <ul style="list-style-type: none"> <li>- Qualitative approaches, such as market research, focus groups, sales testing, etc. relating to affordability;</li> </ul>		



	<p>- Quantitative approaches to determining 'affordability' of product / analysing suitability of pricing for lower income consumers. Studies showing high penetration in lower income consumer segments can also be considered as evidence of such an analysis.</p> <p>Relying on managerial discretion or general characteristics of the product alone is not sufficient for credit, unless decisions are based on qualitative/quantitative research.</p> <p>To be credited with <b>answer option b.</b>, formal definitions of 'lower income consumers' could include government definitions, standard measures of 'low income' or relative poverty, or market research categorisation systems (e.g. the Living Standard Measure), etc.</p> <p>The same strategy/approach credited in this indicator will also be assessed in each subsequent indicator in this category (with the exception of indicator 6). Where a company has multiple separate approaches with no relation to each other, the ATNI analyst will either assess the highest-scoring approach only with the specific geographic multiplier applied; or will take an average of the different approaches, with a wider geographic multiplier applied - whichever yields a higher score.</p>		
	<p><b>Rationale</b></p> <p>The success of an affordable nutrition strategy in meeting the needs of lower income consumers relies heavily on the product pricing being appropriate and realistic to allow regular purchase by those with limited disposable income. However, there are currently no standard definitions of or best practice approaches for defining 'affordability' of packaged foods/beverages. Therefore, companies must be able to show that they have developed a clear process to ensure that their 'affordable nutrition' products are actually affordable to lower income consumers, to avoid a situation whereby it is claimed that they are 'affordable' without this being so.</p> <p>To reinforce this, companies should also use a clear, recognised definition of a 'lower income consumer', such as a government definition in each respective market (where applicable), or a more general, globally-applicable measure (such as the Living Standard Measure (LSM) or Monthly Household Income (MHI)) in order to ensure that the strategy/approach is actually reaching the intended groups.</p> <p>Making these processes transparent in the company's reporting enhances the credibility of the company's affordable nutrition strategy in the eyes of external stakeholders, assuring them that there is substance to this strategy.</p>		
<p>3.</p>  	<p>How widely is the affordable nutrition strategy applied to the company's portfolio in markets in which it is implemented? Please provide evidence.</p> <p>[Please read Scoring guidance carefully]</p>	a. Evidence of a wide range of examples per market	10
		b. Evidence of a wide range of examples in some markets, and specific examples in others	7.5
		c. Evidence of specific examples per market	5
		d. No strategy / no information	0

	<p><b>Scoring guidance</b></p> <p>The purpose of this indicator is to assess the scope of the strategy, and the extent to which the company has a systematic approach applied across the company's (relevant) portfolio, or whether the approach is more piecemeal, relating to specific products in specific markets. While a policy/strategy document, webpage, or other reporting may provide an indication of the scope of the affordable nutrition strategy/approach, the ATNI analyst may require more specific evidence of its implementation across applicable markets, since it is not always clear how it is applied at a market level. If public reporting is not available, evidence in the form of internal product lists, presentations, or documentation may be sufficient.</p> <p>To be considered as a 'wide range of examples' (<b>answer options a. or b.</b>), four or more distinct product examples must be provided per market. If a smaller number of products are provided but it can be demonstrated that these represent a significant (&gt;10%) of sales for that market, this can also be credited as such.</p> <p>The <b>geographic multiplier</b> takes into account the total number of markets the affordable nutrition strategy is applied to. The strategy is considered 'global' if it either applies to all the company's markets, or five or more LMICs.</p> <p>The affordability of the company's products in general, without emphasis on nutritional profile, is not considered relevant for this indicator; such examples will be awarded answer option d.</p> <p>Non-commercial approaches (i.e. product donations, philanthropic programs) are considered out of scope for this Index. The strategy must be commercial: any consumer must be able to purchase the product.</p> <p>The same strategy/approach credited in this indicator will also be assessed in each subsequent indicator in this category (with the exception of indicator 6). Where a company has multiple separate approaches with no relation to each other, the ATNI analyst will either assess the highest-scoring approach only, factoring in the geographic multiplier; or will take an average of the different approaches, with a wider geographic multiplier applied - whichever yields a higher score.</p> <p><b>Rationale:</b></p> <p>Lower income consumers around the world are increasingly depending on food and beverage companies, with their products constituting an increasing proportion of diets, yet rates of malnutrition are worsening among these groups. To improve their diet quality, lower income consumers must therefore have access to nutritious products at affordable prices, especially since food represents the largest share of lower-income consumers' spending.</p> <p>On the one hand, targeting lower income consumers with affordable products could represent a significant opportunity for food and beverage companies, as per the 'Bottom of the Pyramid' (BoP) marketing argument; in 2007, the BoP for food globally was estimated to be USD 2.9 trillion. However, it is essential that companies deliberately consider the nutrition profile of these goods, to avoid exacerbating the trend of supplanting traditional diets and worsening rates of malnutrition. Companies must therefore adopt innovative approaches to ensure that their healthy products are provided at an appropriate price to lower-income consumers, while also being physically accessible to them.</p>		
4.		a. Quantitative target in place	3.34

  	Does the company have at least one quantitative target to improve the affordability/accessibility of its 'healthy' products in place, and is it specific, measurable and timebound?	b. Specific and measurable	3.34
		c. Timebound	3.34
		d. No / no information	0
	(Tick all that apply)		
<b>Scoring guidance</b> <p><b>To be credited for answer option b.,</b> all concepts must be clearly defined: for example, it must be clear how 'affordable', 'healthy', and 'lower income' are defined, where used in the target. If the target involves a percentage increase, then the baseline value must be clear to be credited.</p> <p>If the target involves a percentage increase, both a baseline and target year should be provided <b>to be credited with answer option c.</b></p> <p>Potential examples of targets relating to affordable nutrition:</p> <p>Growing sales of defined 'affordable/healthy products':</p> <ul style="list-style-type: none"> <li>• \$X sales of [formally defined affordable/healthy products] by 2026.</li> <li>• Increase sales of [formally defined affordable /healthy products] by X% per year.</li> <li>• Sell X servings of [formally defined affordable /healthy products] by 2026.</li> <li>• Increase share of [formally defined affordable /healthy products] in LMIC markets to at least X% of total sold volume by 2026.</li> </ul> <p>Number of defined 'affordable/healthy products' available:</p> <ul style="list-style-type: none"> <li>• Of products priced 'affordably' (according to criteria/company definition), X amount to be healthy or fortified by 2026.</li> <li>• Of products defined as 'healthy' (according to formal criteria), X amount to be priced 'affordably' by 2026.</li> </ul> <p>Lowering prices</p> <ul style="list-style-type: none"> <li>• Average price of [healthy products] X% less than market average by 2026.</li> <li>• Lower average price of healthy products by X% by 2026.</li> </ul> <p>Growing customer base among lower income consumers:</p> <ul style="list-style-type: none"> <li>• Increase market penetration of lower income consumers (according to formal definition) by X% by 2026.</li> <li>• To sell approximately X% of Brand Y's sales to lower income consumers by 2026.</li> </ul> <p>Distribution channels</p> <ul style="list-style-type: none"> <li>• Distribute X% of healthier products on channels with a wide distribution (i.e. more than one sales channel above 50% coverage) by 2026.</li> <li>• Include 5000 women in distribution program by 202Y.</li> </ul>			

5. <div>    </div>	<b>Rationale:</b> <p>Both to make the company's affordable nutrition strategy more concrete and to enhance accountability (both internally and externally) for its execution and success, a company should set targets. These should be specific, measurable, and time-bound (baseline/ target year), which will make them more credible in the eyes of external stakeholders.</p>		
	What kind of evidence can the company provide showing the implementation of its affordable nutrition strategy/approach (within the last three years)?	a. Quantitative data of outcome-level results	10
		b. Quantitative data of output-level results	5
		c. Specific (primarily qualitative) examples of implementation only	2.5
		d. No / no information	0
	<b>Scoring guidance</b> <p>Only the strategy/approach credited in previous indicators will be assessed in this indicator.</p> <p><b>Quantitative outcome-level data (a.)</b> captures the commercial impact or desired results of the strategy as a result of its implementation (i.e. the outputs), for example in terms of increase in sales (value or volume) of 'affordable nutrition' products, increased market penetration into lower-income segments, etc.</p> <p><b>Quantitative output-level data (b.)</b> captures actions taken in line with the strategy that could contribute to achieving an outcome or desired result of the strategy, for example: the number or percentage of products meeting affordable nutrition criteria; the number of new affordable nutrition products launched, etc.</p> <p>If the company only provides examples of specific products that are part of its affordable nutrition strategy or relevant case studies, <b>answer option c.</b> is credited.</p>		
	<b>Rationale</b> <p>For accountability purposes, it is important that the company can show that it is following through on its affordable nutrition strategy and taking relevant actions to achieve its aims. Ideally, the company will measure (and report on) outcome-level results of its activities to demonstrate that the strategy is working as intended. Meanwhile if the company has a target in place, it is important that the company tracks progress against this.</p>		



<div>6.</div> <div></div> <div></div>	Can the company provide evidence of taking steps to measure the relative pricing of its 'healthier' products relative to its general portfolio, and to improve the price differential between them?  (Tick all that apply)	a. Measure the relative affordability of its 'healthy' portfolio vs general portfolio	5
		b. Steps taken to improve price differential between 'healthy' portfolio vs general portfolio	5
		c. No / No information	0
	<b>Scoring guidance</b>  The action assessed in this indicator does not have to be related to the strategy/approach addressed in the previous indicators: ideally, it will apply to its whole portfolio. The company must have a formal definition of 'healthy', applicable to its wider portfolio, to be credited on this indicator: check indicator B3.1 for information (this does not need to relate to the definition used in indicator 2).  Possible examples for answer option a. include: - Calculating and comparing the average price per serving of its 'healthy' products vs its general portfolio (/products not classified as healthy), ideally on a category-by-category and market-level basis.  Possible examples for answer option b. include: - Showing evidence of improving the price differential measured in the previous step; - Showing prices being lowered (/frozen) at a greater rate for healthy products than non-'healthy' products; - Showing new 'healthy' products being introduced at a lower price than equivalent products that do not meet healthy criteria.  Actions showing price improvements for 'healthy' products alone is not sufficient for credit in this indicator, unless it can be clearly shown that this is happening at a proportionately greater rate than for non-'healthy' products.		
<b>Rationale</b>  Price is a significant determinant of food choice, especially for lower income consumers, who typically spend a significantly higher proportion of their disposable incomes on food, relative to those with high-incomes. Moreover, numerous studies have shown that less healthy products are typically cheaper than healthier alternatives. Product pricing is therefore an important means by which food and beverage companies can steer consumers towards healthier choices and positively impact public health.  While making affordable 'healthy' products available is an important step to achieving this, this positive impact can easily be offset if the company continues to offer a range of unhealthy products at equally if not more affordable prices. It is therefore critical that companies start to look at the relative pricing of their 'healthy' products versus their general portfolio, and take steps to improve this price differential.			

## Category D: Responsible Marketing


**Category weighting:** 15%



**Total possible score:** 70



**Category-specific multiplier:** Score from indicator 2 applied to subsequent indicators





automatically

No.	Indicator question	Answer options	Score
1. 	Does the company have a responsible marketing policy that includes the following commitments related to the representation of products (for all audiences):  (Tick all that apply)	a. Presenting products in the appropriate portion size and context (and not to condone or encourage excess consumption) (Article 1 of ICC*)	2
		b. Copy, sound and visual presentations should accurately represent the material characteristics of the product featured (Article 5 of ICC*)	2
		c. Not to represent food products not intended to be substitutes for meals as such (Article 5 of ICC*)	2
		d. Not to use consumer taste or preference tests in a way that might imply statistical validity if there is none (Article 9 of ICC*)	2
		e. Not to undermine the concept of healthy balanced diets (Article 17 of ICC*)	2
		f. No policy / no information	0



	<p><b>Scoring guidance</b></p> <p>If a company publicly commits to follow the <a href="#">ICC Framework for Responsible Food and Beverage Marketing Communications (2019)</a>, answer options a. to e. may be credited. If not, these commitments (or a close approximation to them) should be listed in a responsible marketing policy in relation to marketing to <i>all</i> audiences (not for children specifically).</p> <p><b>Rationale</b></p> <p>*ICC Framework for Responsible Food and Beverage Marketing Communications, 2019, sets forth how general principles of the ICC Advertising and Marketing Communications Code, 2018, which governs all marketing communications, and includes separate sections on sales promotion, sponsorship, direct marketing, digital interactive marketing, and environmental marketing, is applied in the context of food and beverage marketing communications. For more information, see: <a href="https://cms.iccwbo.org/content/uploads/sites/3/2018/09/icc-advertising-and-marketing-communications-code-int.pdf">https://cms.iccwbo.org/content/uploads/sites/3/2018/09/icc-advertising-and-marketing-communications-code-int.pdf</a> and <a href="https://iccwbo.org/content/uploads/sites/3/2019/08/icc-framework-for-responsible-food-and-beverage-marketing-communications-2019.pdf">https://iccwbo.org/content/uploads/sites/3/2019/08/icc-framework-for-responsible-food-and-beverage-marketing-communications-2019.pdf</a></p>							
2. 	What kind of nutrient profile model does the company use to restrict the marketing of unhealthy products to children?	<table><tr><td>a. No products marketed to children / Only products meeting WHO Regional Nutrient Profile Models or a government-endorsed nutrient profile model* to classify foods to be restricted from marketing**</td><td>1</td></tr><tr><td>b. Only products meeting the company’s own or industry association-related standards for marketing to children and/or teens</td><td>0.5</td></tr><tr><td>c. No product restriction</td><td>0</td></tr></table>	a. No products marketed to children / Only products meeting WHO Regional Nutrient Profile Models or a government-endorsed nutrient profile model* to classify foods to be restricted from marketing**	1	b. Only products meeting the company’s own or industry association-related standards for marketing to children and/or teens	0.5	c. No product restriction	0
a. No products marketed to children / Only products meeting WHO Regional Nutrient Profile Models or a government-endorsed nutrient profile model* to classify foods to be restricted from marketing**	1							
b. Only products meeting the company’s own or industry association-related standards for marketing to children and/or teens	0.5							
c. No product restriction	0							
	<p><b>Scoring guidance</b></p> <p>*For a full list of government endorsed NPMs please see this scientific review from 2018: <a href="https://doi.org/10.1093/advances/nmy045">https://doi.org/10.1093/advances/nmy045</a>, Table 3; or updated version from 2023: <a href="https://doi.org/10.1016/j.advnut.2023.08.013">https://doi.org/10.1016/j.advnut.2023.08.013</a></p> <p>**If a company has benchmarked the definition of ‘healthy’ it uses for the purposes of marketing to children and can show that this is stricter than (or &lt;10% deviation from) government-endorsed Nutrient Profile Model (NPM)’s healthy threshold or WHO standards, it can be credited accordingly.</p> <p>The score from this indicator is used as a multiplier for subsequent indicators with a  symbol.</p>							

	<p>If the company applies different standards in different markets, then the definition used in the company's main responsible marketing policy (as found on its website / applying to its home market / applying to the widest number of markets) is considered for this indicator, and the same geographic multiplier applied in subsequent indicators.</p>		
	<p><b>Rationale</b></p> <p>There is a <a href="#">wealth of evidence</a> that the marketing of products high in fat, sugar and salt (HFSS) adversely affects children's eating and drinking behavior, preferences, requests, nutrition knowledge, and food intake, thereby contributing to rising rates of obesity and diet-related NCDs. In order to limit the negative impact of food and beverage marketing, companies are encouraged to refrain from marketing any of their products that are high in saturated fatty acids, trans-fatty acids, free sugars and/or salt, according to a robust nutrient profile model (NPM).</p> <p>Consequently, the WHO has developed a series of Regional Nutrient Profile Models to identify foods whose marketing should be restricted in order to protect children from the harmful impacts of the marketing of unhealthy foods and beverages. These are considered the gold standard for defining which products can and cannot be marketed to children. The regional models can be found here:</p> <p>Europe: <a href="https://www.who.int/europe/publications/i/item/WHO-EURO-2023-6894-46660-68492">https://www.who.int/europe/publications/i/item/WHO-EURO-2023-6894-46660-68492</a></p> <p>Pan-American Region: <a href="https://www.paho.org/en/nutrient-profile-model">https://www.paho.org/en/nutrient-profile-model</a></p> <p>South-East Asia Region: <a href="https://apps.who.int/iris/handle/10665/253459">https://apps.who.int/iris/handle/10665/253459</a></p> <p>African Region: <a href="https://apps.who.int/iris/bitstream/handle/10665/329956/9789290234401-eng.pdf?sequence=1&amp;isAllowed=y">https://apps.who.int/iris/bitstream/handle/10665/329956/9789290234401-eng.pdf?sequence=1&amp;isAllowed=y</a></p> <p>Many companies and industry initiatives have developed their own nutrition criteria for determining which products can be marketed to children. However, <a href="#">numerous studies</a> have found that, in nearly all cases, the thresholds and criteria used to determine which products are sufficiently healthy to be marketed to children are significantly less strict than those of the WHO regional models.</p>		
<p>3.</p>  	<p>What age range does the company's responsible marketing to children policy use to define 'children'?</p>	<p>a. Below the age of 18</p>	<p>10</p>
		<p>b. Below the age of 16</p>	<p>6.66</p>
		<p>c. Below the age of 12/13</p>	<p>3.33</p>
		<p>d. No / No information</p>	<p>0</p>



	<p><b>Scoring guidance:</b></p> <p>To be credited for this indicator, companies should publish an age threshold to define ‘children’ in their responsible marketing to children policies, or explicitly and publicly reference their commitment to an industry Pledge that includes an age threshold for children.</p> <p>If the company uses different age thresholds for different media/techniques or other commitments, then either the lower answer option is selected, or intermediary answer option (if applicable).</p> <p><b>Rationale</b></p> <p>The Convention on the Rights of the Child defines children as those under the age of 18 years. Adolescents are often not included within the scope of the marketing restrictions due to the assumption that they have more advanced cognitive ability than younger children. However, evidence shows that adolescents’ neurological, hormonal and social developmental factors make them particularly susceptible to HFSS advertising; and they also have more purchasing power than younger children as they often have money with which to purchase food items. Further, the WHO notes that age thresholds that do not take adolescents into account can lead to companies to older children (i.e., 12 – 18 years) to a greater extent due to ‘migration’. Consequently, both <a href="#">WHO</a> and <a href="#">UNICEF</a> recommend that restrictions on the marketing of unhealthy products should include children up to the age of 18.</p>						
<p>4.</p>  	<table border="1"> <tr> <td data-bbox="371 730 1088 1396"> <p>How comprehensively does the company apply its responsible marketing to children commitments assessed in indicators 2 and 3 to marketing media, channels, settings, and techniques?</p> <p>Please read Scoring Guidance carefully.</p> <p>Tick all that apply.</p> </td><td data-bbox="1088 730 2045 1396"> <p><b>Tier 1: In line with WHO recommendations / best practices</b></p> <ul style="list-style-type: none"> <li>• In-store and point-of-sale marketing (on-shelf, check-out, and end-of-shelf displays; vending machines; special offers/incentives/points schemes) - without exceptions</li> <li>• Packaging design (colors, graphics, fonts, characters, etc) - without exceptions</li> <li>• Product placements across <i>all</i> media (movies, TV shows, online series, computer games, etc)</li> <li>• Company-owned animated/cartoon characters with a strong appeal to children</li> <li>• Native advertising</li> <li>• User-generated content campaigns</li> <li>• Brand advertising</li> <li>• Near secondary schools</li> <li>• Near primary schools</li> <li>• Other places where children gather (all/many examples provided)</li> <li>• Influencers compensated in-kind</li> <li>• In-game promotions</li> </ul> <table border="1"> <tr> <td data-bbox="1088 1276 1924 1337">a.1 All of the above</td><td data-bbox="1924 1276 2045 1337">10</td></tr> <tr> <td data-bbox="1088 1337 1924 1396">a.2 7-9 of the above</td><td data-bbox="1924 1337 2045 1396">7.5</td></tr> </table> </td></tr> </table>	<p>How comprehensively does the company apply its responsible marketing to children commitments assessed in indicators 2 and 3 to marketing media, channels, settings, and techniques?</p> <p>Please read Scoring Guidance carefully.</p> <p>Tick all that apply.</p>	<p><b>Tier 1: In line with WHO recommendations / best practices</b></p> <ul style="list-style-type: none"> <li>• In-store and point-of-sale marketing (on-shelf, check-out, and end-of-shelf displays; vending machines; special offers/incentives/points schemes) - without exceptions</li> <li>• Packaging design (colors, graphics, fonts, characters, etc) - without exceptions</li> <li>• Product placements across <i>all</i> media (movies, TV shows, online series, computer games, etc)</li> <li>• Company-owned animated/cartoon characters with a strong appeal to children</li> <li>• Native advertising</li> <li>• User-generated content campaigns</li> <li>• Brand advertising</li> <li>• Near secondary schools</li> <li>• Near primary schools</li> <li>• Other places where children gather (all/many examples provided)</li> <li>• Influencers compensated in-kind</li> <li>• In-game promotions</li> </ul> <table border="1"> <tr> <td data-bbox="1088 1276 1924 1337">a.1 All of the above</td><td data-bbox="1924 1276 2045 1337">10</td></tr> <tr> <td data-bbox="1088 1337 1924 1396">a.2 7-9 of the above</td><td data-bbox="1924 1337 2045 1396">7.5</td></tr> </table>	a.1 All of the above	10	a.2 7-9 of the above	7.5
<p>How comprehensively does the company apply its responsible marketing to children commitments assessed in indicators 2 and 3 to marketing media, channels, settings, and techniques?</p> <p>Please read Scoring Guidance carefully.</p> <p>Tick all that apply.</p>	<p><b>Tier 1: In line with WHO recommendations / best practices</b></p> <ul style="list-style-type: none"> <li>• In-store and point-of-sale marketing (on-shelf, check-out, and end-of-shelf displays; vending machines; special offers/incentives/points schemes) - without exceptions</li> <li>• Packaging design (colors, graphics, fonts, characters, etc) - without exceptions</li> <li>• Product placements across <i>all</i> media (movies, TV shows, online series, computer games, etc)</li> <li>• Company-owned animated/cartoon characters with a strong appeal to children</li> <li>• Native advertising</li> <li>• User-generated content campaigns</li> <li>• Brand advertising</li> <li>• Near secondary schools</li> <li>• Near primary schools</li> <li>• Other places where children gather (all/many examples provided)</li> <li>• Influencers compensated in-kind</li> <li>• In-game promotions</li> </ul> <table border="1"> <tr> <td data-bbox="1088 1276 1924 1337">a.1 All of the above</td><td data-bbox="1924 1276 2045 1337">10</td></tr> <tr> <td data-bbox="1088 1337 1924 1396">a.2 7-9 of the above</td><td data-bbox="1924 1337 2045 1396">7.5</td></tr> </table>	a.1 All of the above	10	a.2 7-9 of the above	7.5		
a.1 All of the above	10						
a.2 7-9 of the above	7.5						




		a.3 4-6 of the above	5
		a.4 2-3 of the above	2.5
		a.5 One of the above	1
		<b>Tier 2: Increasingly common</b> <ul style="list-style-type: none"> <li>• In secondary schools</li> <li>• Cinema</li> <li>• Sponsorship of events/activities frequented by children</li> <li>• Outdoor (billboards, posters, vehicles, etc)</li> <li>• Influencers (paid)</li> <li>• Paid ads on third-party websites, social media, and apps</li> <li>• Toys, premiums, vouchers, giveaways</li> <li>• Third-party fantasy and animated/cartoon characters with a strong appeal to children</li> <li>• Streaming platforms (TV, movies, music)</li> <li>• Other places where children gather (specific examples)*</li> <li>• Product placements (for specific media, not all)*</li> <li>• In-store and point-of-sale marketing (on-shelf, check-out, and end-of-shelf displays; vending machines; special offers/incentives/points schemes) - with exceptions*</li> <li>• Packaging design (colors, graphics, fonts, characters, etc) - with major exceptions*</li> </ul>	
		b.1 All of the above	6
		b.2 Most of the above	4
		b.3 Some of the above	2
		<b>Tier 3: Foundational</b> <ul style="list-style-type: none"> <li>• Print media (newspapers, magazines, books)</li> <li>• Broadcast media (TV, radio)</li> <li>• In primary schools</li> <li>• Paid ads on third-party websites*</li> <li>• Social media (company/brand accounts)</li> <li>• Mobile / SMS marketing</li> <li>• Celebrities, influencers, and other people with strong appeal to children</li> </ul>	

		c.1 All	4
		c.2 Some	2
		d. No responsible marketing to children policy / no information	0
	<b>Scoring guidance</b>		
<p>Only one 'a.', 'b.' and 'c.' answer option can be selected.</p> <p>This indicator assesses the comprehensiveness of the marketing coverage of company's responsible marketing to children policy on the basis of what specific media channels, settings, and/or techniques are listed.</p> <p>These have been categorised according to Tiers 1-3, which assign media channels according to the extent to which they tend to be covered in industry self-regulatory codes/policies, with Tier 1 being the least covered (currently) and Tier 3 the most.</p> <p>A media channel/setting/technique is considered if it is clear that the company's commitment on restricting the marketing of unhealthy products (however defined in indicator 2) to children (as defined by indicator 3) applies to it, or stricter (e.g. if the company commits to not market ANY products to children on a particular channels/using a particular technique). If the company makes a specific commitment but it is less strict (e.g. the age of a 'child' is lower), it is not taken into consideration.</p> <p>Alternatively, if the company includes a general statement in its policy regarding 'scope', it can be scored as followed:</p> <ul style="list-style-type: none"><li>• "All marketing" without such a definition: a.4, b.2, c.1;</li><li>• "All advertising / paid marketing": b.2, c.1.</li></ul> <p>If the company makes additional commitments these can be added and scored appropriately; alternatively, if the company makes specific exceptions, the scores can be lowered accordingly.</p> <p>* Exclude from tier if the company fulfils the corresponding channel in the above tier.</p>			
<b>Rationale</b>			
<p>The World Health Organisation (WHO) attributes the impact of marketing to children to exposure (communication channels, times, and frequency in which children see and experience marketing) and power (the message content). The WHO recommends that restrictions on marketing of unhealthy</p>			

	<p>foods to children “be sufficiently comprehensive to minimise the risk of migration of marketing to other media, to other spaces within the same medium or to other age groups”.</p> <p>Children are exposed to a wide range of marketing techniques and channels beyond traditional broadcast media, some of which are often excluded from industry self-regulatory initiatives (e.g. child-directed in-store marketing, and sponsorships of children’s events/activities). In addition, the changing digital landscape amplifies existing marketing strategies, enabling more engaging, immersive, integrated and personalised marketing techniques. A company’s policy that is less than comprehensive in scope means that there is a risk that child-directed marketing may migrate to those channels/techniques not explicitly covered, allowing the company to market to children without breaching its policy.</p> <p>Given the vast array of different marketing techniques available and its ever-evolving landscape (especially in the digital sphere), it is essential that companies’ policies cover all marketing channels, are as explicit as possible about which specific marketing channels are covered, and are continually updated in line with wider developments in marketing practices.</p> <p>The answer options are adapted from the WHO’s <a href="#">‘A framework for implementing the set of recommendations on the marketing of foods and non-alcoholic beverages to children’ (2012)</a> and the more recent <a href="#">WHO guidance from 2023</a>, as well as analysis of past ATNI Global Index findings and consultations on with members of its Expert Group.</p>		
5.  	Does the company seek to further limit children’s exposure to the marketing of unhealthy products by adopting audience thresholds for measured media (TV, radio) and/or time-based restrictions (for TV)?  (Tick all that apply)	a.1. Audience threshold of <25%	7.5
		a.2. Audience threshold of <30%	5
		a.3. Audience threshold of <35%	2.5
		b. Time-based restriction	2.5
		c. No / Less strict thresholds/restrictions / No information	0
	<p><b>Scoring guidance</b></p> <p>Only one answer option a. can be selected.</p> <p>To be credited with an answer option ‘a.’, the company must specify in its policy what percentage of an audience can be made up of children (as the company defines them in indicator 3), according to the broadcaster’s estimates at the time of media buy; above this percentage, the company will not market unhealthy products (according to its policy/definition in indicator 2).</p> <p>To be credited for answer option b, the company must specify the viewing times within which it commits not to market ‘unhealthy’ products (according to its policy/definition in indicator 2), based on broadcasters’ estimates at the time of media buy. To be credited for this answer option, the timeslots</p>		



	identified by the company must be in line or stricter than timeslots identified in WHO and UNICEF guidance, such as between 6:00-22:00 or 5:00-21:00 on channels including TV, radio, and cinema.		
	<p><b>Rationale</b></p> <p>For certain media types, such as TV and radio, it is possible to measure the demographics of the audience that tune-in to certain channels/programs. Where children make up a disproportionate part of the audience of a channel or program, this can be considered to be 'child-directed', and companies are recommended to refrain from advertising unhealthy products. The lower the percentage at which a channel can be considered as 'child-directed', the more comprehensive the policy is considered: the current industry best practice is 25%, whereas Chile's law considers it to be 20%.</p> <p><a href="#">WHO guidance from 2023</a> indicates that measures that rely on gauging the percentage of children in the audience, or definitions of child programming, are insufficient on their own. Therefore, time-based restrictions are increasingly being implemented in government policies in addition to audience thresholds to limit children's exposure to food and beverage marketing across certain media channels, including television, radio, and cinema. Companies are therefore encouraged to adopt this into their policies</p>		
6.  	Does the company audit compliance with its responsible marketing to children policy on an annual basis?	a. Yes, commissioning an external auditor to audit compliance with the company's own specific marketing commitments	10
		b. Yes, by an external auditor appointed by an industry association/initiative to audit compliance with the industry association's marketing commitments only	5
		c. Yes, by its own internal auditors, to audit compliance with the company's own specific marketing commitments	5
		d. No audit / No information	0
	<p><b>Scoring guidance</b></p> <p>If the company provides sufficient evidence that its responsible marketing to children policy is audited by two or more of the parties listed above, credit will be given to the highest scoring answer option, factoring in the geographic multiplier.</p> <p><b>Rationale</b></p>		

	<p>Auditing companies’ compliance with their responsible marketing strategies is important for transparency and accountability, and helps to show the extent to which companies’ marketing activities are meeting their responsible marketing policies. The results of such audits help companies to proactively identify gaps and allow for corrective action to be taken.</p> <p>An external independent party commissioned by a company to conduct an audit of compliance with its responsible marketing policy is more likely to be free from bias or conflicts of interest, and therefore perform an objective assessment than an internal auditor.</p> <p>Further, a company’s responsible marketing commitments may extend beyond the commitments outlined by an industry association’s responsible marketing policy. While an external independent party may be commissioned by an industry association to perform an audit of member companies’ compliance with their policy, the audit may not extend to the commitments in individual companies’ policies. An audit conducted by an independent party appointed by the company itself is therefore more likely to capture the full scope of its responsible marketing commitments across relevant media channels.</p>		
<div>7.</div> <div></div>	How many distinct media channels/settings does the company's audit of its responsible marketing to children policy cover (per market)?	a. 6 or more	10
		b. 4 or 5	7.5
		c. 2 or 3	5
		d. 1	2.5
		e. No audit / no information	0
	<p><b>Scoring guidance</b></p> <p>For this indicator, the most recent audit of the company’s responsible marketing to children policy is taken into consideration.</p> <p>‘Distinct media channels/settings’ means that qualitatively similar channels/settings are counted together. For example, Facebook, X, and Instagram would all be considered as ‘Social Media’; newspapers and magazines would both be considered as ‘Print’. For more examples of groupings, see the Scoring Guidance for indicator 4.</p> <p>This indicator assesses media per market. Therefore, if audits are conducted in multiple markets and different media are assessed in each market, either: the average media per market will be scored, with a higher geographic multiplier applied; or the market(s) with the highest number of media will be scored, with the lower geographic multiplier applied – whichever yields the higher score.</p> <p>To be considered ‘Global’ for this indicator, at least 10 markets must be audited, unless the company is present in fewer than 10 markets.</p>		

	No adjustments are made if the company's responsible marketing policy applies to less than 6 distinct types of media/settings.
	<p><b>Rationale</b></p> <p>An assessment of companies' marketing across different media and settings is important to evaluate companies' impact on reducing marketing exposure and power to children. To be considered a comprehensive assessment of compliance against a company's responsible marketing policy, the audit must cover a variety of media platforms on which the company markets its products. The audit should ideally extend beyond traditional measured media to other platforms for marketing recognised by UNICEF, including online, social media, apps, in-game, cinema, digital and outdoor advertising.</p>

## Category E: Workforce Nutrition

**Category weighting:** 5%

**Total possible score:** 60




**Category specific multiplier:**



'Availability multiplier' (drop-down menu):

- a. All/most workers (including manufacturing workers) 1
- b. Some workers, including manufacturers
- c. Only office workers / unspecified



0.75  
0.5



No.	Indicator question	Answer options	Score
1.      	Does the company have a workforce nutrition program for employees that includes a focus on healthy food at work?	a. Yes, a clearly defined program including measurable targets or key performance indicators (KPIs)	10
		b. Yes, a clearly defined program without measurable targets/KPIs	7.5
		c. Yes, some evidence of making healthy food available at work, but not part of a clear policy/ program	5
		d. No/ no information	0
	<b>Scoring guidance</b>  The Workforce Nutrition Alliance (WNA) defines 'healthy food at work' as: "programs which focus on increasing employees' access to healthy and safe foods at work. Employers may provide healthy food for free, with a subsidy, or at full cost to the employee. These programs change the food		

	<p>environment through healthier canteen meals (some include promotion alongside options), snack offerings, vending machine options, more balanced portion sizes. All of these shape people’s access to nutritious foods and encourage healthier choices.”</p> <p>To be credited with <b>answer options a. or b.</b>, the company should show evidence of making deliberate efforts to increase employees’ access to healthy and safe foods at work as part of a program, with a clear goal and objective, consists of multiple elements as appropriate to the situation (such as availability, accessibility, nutrition information and/ or worker engagement - see for example the <a href="#">WNA self-assessment scorecard</a>, page13).</p> <p>If the examples/evidence of ‘healthy food at work’ provided are not clearly part of a long-term program – for example, if they are more ad hoc in nature, involves only a singular, very specific intervention, are primarily passive in nature, and/or are short-term/temporary – <b>answer option c.</b> is selected.</p> <p>Evidence could include, for example, a project plan or policy document, public reporting on activities, employee/management briefings, canteen menus, and/or evaluation of the program.</p> <p>To be credited with <b>answer option a.</b>, there must be measurable targets or KPIs in place. These could be in terms of the number/ percentage of healthy food items made available, the number of occasions that healthy food is made available, the number of workers reached (output), or number of workers consuming nutritionally improved meals) (outcome). More examples can be found in the <a href="#">WNA Healthy Food at Work Guidebook</a> on page 32.</p>										
	<p><b>Rationale</b></p> <p>Workplace settings, as contained environments which can be modified with relative ease, and which involve consistent interaction with a substantial and recurrent audience, are recognised by the WHO to be a promising platform for implementing nutrition interventions at scale. There is considerable evidence that providing healthy food at the workplace can lead to positive health outcomes for the employees (see the WNA <a href="#">Healthy Food at Work evidence brief</a>, for example).</p> <p>The business case for investing in workforce nutrition programs is clear, as the benefits associated with providing healthier food at work can include: improved employee health and wellbeing, increased productivity, reduced absenteeism, and increased employee morale, engagement, and retention. Studies have estimated the financial returns on investment for companies on workforce nutrition programs to be up to 6:1.</p>										
2.  	Does the company have a workforce nutrition program for employees that includes a focus on nutrition education?	<table><tr><td>a. Yes, a clearly defined program including measurable targets or key performance indicators (KPIs)</td><td>10</td></tr><tr><td>b. Yes, clearly defined program without measurable targets/KPIs</td><td>7.5</td></tr><tr><td>c. Yes, some evidence of nutrition education for workers, but not part of a clear policy/ program</td><td>5</td></tr><tr><td>d. No/ no information</td><td>0</td></tr></table>	a. Yes, a clearly defined program including measurable targets or key performance indicators (KPIs)	10	b. Yes, clearly defined program without measurable targets/KPIs	7.5	c. Yes, some evidence of nutrition education for workers, but not part of a clear policy/ program	5	d. No/ no information	0	
a. Yes, a clearly defined program including measurable targets or key performance indicators (KPIs)	10										
b. Yes, clearly defined program without measurable targets/KPIs	7.5										
c. Yes, some evidence of nutrition education for workers, but not part of a clear policy/ program	5										
d. No/ no information	0										

<

  		d. No/ no information	0
	<p><b>Scoring guidance</b></p> <p>According to the Workforce Nutrition Alliance (WNA), ‘Nutrition related health checks’ involve “periodic one-to-one meetings with a health or nutrition professional to assess, and usually discuss, the employee’s nutritional health. Health checks provide personalised data for each employee, giving them a better understanding of their nutritional risk factors. These might include cholesterol and/or blood-pressure screenings, or weight monitoring and classification (for example using Body Mass Index (BMI) to assess whether an employee is underweight, overweight, or obese).”</p> <p>To be credited with <b>answer options a. or b.</b>, the company should show evidence of making nutrition-focused health checks available, either at subsidised rates or free-of-charge to its employees, with a clear goal and objective, consists of multiple elements as appropriate to the situation (such as availability, accessibility, and/or worker engagement - see for example the <a href="#">WNA self-assessment scorecard</a>, page 9).</p> <p>If the examples/evidence of ‘nutrition related health checks’ provided are not clearly part of a sustained program – for example, if they are more ad hoc, involves only a singular, very specific intervention, are primarily passive in nature, and/or are short-term/temporary – <b>answer option c.</b> is selected.</p> <p>Evidence could include, for example, a project plan or policy document, public reporting on activities, employee/management briefings, and/or evaluation of the program.</p> <p>To be credited with <b>answer option a.</b>, there must be measurable targets or KPIs in place. These could be in terms of the number of indicators measured that link to diet-related diseases (e.g., weight, BMI, blood pressure), frequency of healthy checks provided, number of workers with access to the program (output), or number of workers participating in the program (outcome). More examples can be found in the <a href="#">WNA Nutrition Related Health Checks Guidebook</a>, page 21.</p> <p><b>Rationale</b></p> <p>Evidence suggests that nutrition health checks can help prevent non-communicable diseases like diabetes and heart disease. Studies conducted in offices and factory settings found promising results especially when health-checks were coupled with counselling.</p> <p>Benefits to the company of providing nutrition focused health checks to its employees can include: increasing employees’ awareness and understanding about their own nutritional health status; increasing employees’ healthy behavior and willingness to improve their nutritional behaviors; preventing non-communicable diseases in the workforce and improving health employee health and wellbeing; increasing employee retention and attracting prospective employees; demonstrating to employees their value to the company by providing access to healthcare during paid work time.</p> <p>Aggregated data from the health checks can be used to monitor results of the company wider workforce nutrition program, provided that strict confidentiality procedures are followed (see, for example, <a href="#">WNA Nutrition Related Health Checks Guidebook</a>, page 9).</p>		

4.

How much paid maternity leave and paternity/second caregiver leave does the company offer (beyond minimum legal requirements per market)?

a.1. Paid maternity leave: 26 weeks or more (WHO recommendation)

7.5

a.2. Paid maternity leave: Between 14 and 26 weeks

6.5

a.3. Paid maternity leave: 14 weeks (ILO recommendation)

5

b.1. Paid paternity/second caregiver leave of at least 12 weeks

2.5

b.2. Paid paternity/second caregiver leave: at least 4 weeks

1.25

b.3 Paid paternity/second caregiver leave: at least 2 weeks

0.63

c. No maternity or second caregiver leave granted / no information

0

Scoring guidance

Only one 'a.' option and one 'b.' option can be selected.

Only paid leave is assessed in this indicator: leave that is unpaid or paid less than two-thirds of the usual salary will not be credited.




However, if a paid parental leave period is offered *in addition to* paid maternity leave, the latter will be scored first and revised upward depending on the length of additional parental leave offered, with an appropriate answer option 'b.' selected.



If the company is only active in markets where paid maternity or paternity leave is a legal requirement, compliance with the law is taken as a given and will not be credited. Companies are expected to go beyond regulatory requirements, and/or extend the paid maternity/paternity leave it offers to staff in other markets where this is not mandatory. If the company is only active in markets in which it is mandatory to offer maternity leave of 26 weeks, this indicator will be considered to be 'Not applicable'.

Rationale

The [World Health Organisation \(WHO\)](#) recommends that mothers breastfeed exclusively (no other liquids or foods) for the first six months after birth; this not only has significant nutritional and health benefits for the child, but also for the mother. Time, resources, and protective policies are critical to support breastfeeding mothers: consequently, returning to work has been found to be one of the greatest barriers to breastfeeding. Offering paid maternity leave is therefore critical, enabling mothers and babies to recover from birth, bond with their babies, and breastfeed in the critical early weeks and months of life. A [wealth of evidence](#) from countries at all income levels has found that longer periods of maternal leave reduce infant mortality rates.



	<p>The International Labour Organisation (ILO) stipulates that 14 weeks should be the minimum time period for paid maternity leave to be offered (Article 4(1), C183 - Maternity Protection Convention, 2000 (No. 183)), and that the amount of pay should not be less than two-thirds of the original salary. However, to optimally support mothers to breastfeed exclusively for the first six months, the WHO recommends paid leave of 26 weeks or more.</p> <p>There is also evidence raising the possibility that paternity leave may indirectly affect children's health. <a href="#">Studies have found</a> that fathers who take paternity leave are more involved in childcare and other unpaid labor at home, which may support mothers' breastfeeding and reduce the likelihood of post-partum depression, which in turn benefits infant health. There is currently no international standard for paternity leave. As of 2023, the United Nations and <a href="#">WHO</a> offers all their employees 16 weeks of paid parental leave, including fathers/second caregivers, increasing from 8 weeks of paternity leave.</p> <p>Companies are encouraged to establish a policy that goes beyond legal minimum requirements and define a minimum arrangement across the markets they operate in (of course allowing for longer paid leave where legally required).</p>		
5.      	<p>Does the company offer the following arrangements to support breastfeeding mothers at work:</p> <p>(Tick all that apply)</p>	a. Private, hygienic, safe rooms to express breastmilk	2.5
		b. Refrigerators to store breastmilk	2.5
		c. Allow breastfeeding mothers paid breaks to express breastmilk	2.5
		d. Other flexible working arrangements to support breastfeeding mothers	2.5
		e. No / no information	0
	<p><b>Scoring guidance</b></p> <p>Regarding answer option a., breastfeeding rooms must be located in a physically separate area, with direct access, away from the restrooms, but close to the workspace. It must also ensure privacy, so entrances must therefore be closed properly, and the facilities must be designed to ensure that mothers using the room are not visible from the outside, as per the <a href="#">UNICEF Guide on Breastfeeding support in the workplace</a>.</p> <p>Examples of evidence for this indicator could include an (internal) company policy document or employee handbook, documentation of the number of breastfeeding facilities, and pictures of breastfeeding rooms as supporting evidence. If only the latter is provided, without an accompanying public/internal statement that these are applied to all sites, the 'Availability' multiplier will be set to 'c.', since it cannot be verified that they are found in all sites.</p> <p><b>Rationale</b></p> <p>The <a href="#">World Health Organisation (WHO)</a> recommends that mothers breastfeed exclusively (no other liquids or foods) for the first six months after birth, and continue to breastfeed, along with adequate complementary foods, for two years of age and beyond. Measures to support breastfeeding at the workplace have been shown to increase the period of exclusive breastfeeding. This not only has significant nutritional and health benefits for the child,</p>		



	<p>but also for the mother. In the workplace, this translates to improved productivity and reduced sick days for working mothers, and decreased healthcare costs. Employee retention has also been found to increase when breastfeeding support is offered by employers. The United States Breastfeeding Committee reports that for every USD 1 invested to support breastfeeding, employers realize a cost saving of USD 3.</p> <p>See the <a href="#">WNA Breastfeeding Support Evidence brief</a> and <a href="#">WNA Breastfeeding Support Guidebook</a> for more information.</p>		
<b>6.</b>   	<p>Does the company have one or more programs/projects in place specifically to improve the health and nutrition of workers in its supply chains that are at heightened risk of experiencing malnutrition, such as farmers in low- or middle-income countries (including smallholders)?</p>	a. Yes, scaled-up programs in multiple distinct supply chains	10
		b. Yes, a scaled-up program in one distinct supply chain	7.5
		c. Yes, smaller scale/pilot projects in multiple distinct supply chains	7.5
		d. Yes, a smaller scale/pilot project in one supply chain	5
		e. No / no information	0
	<p><b>Scoring guidance</b></p> <p>To be credited for this indicator, the project/program(s) must include an explicit focus on nutrition, involving at least one element of (1) enabling availability, access, and/or affordability of nutritious foods, (2) nutrition education, (3) nutrition-related health checkups, or (4) breastfeeding support. A (non-exhaustive) list of potential examples can be found on p.28 of ATNI's <a href="#">Action Research on Workforce Nutrition in the Supply Chains report</a>. Other interventions, such as those aiming to improve incomes can be credited only if improving nutrition is <i>explicitly</i> cited as an aim or impact of the program (since higher incomes are not guaranteed to translate into improved nutrition).</p> <p>In addition, to be credited, the beneficiaries of the project/program(s) must <i>not</i> be directly employed by the company, but must be part of the company's supply chain. This supply chain can be for products outside of the scope of the Global Index, such as pure coffee and tea, or non-food products the company produces. Families of supply chain workers are also considered relevant.</p> <p>The distinction between 'scaled-up programs' and 'smaller scale/pilot project' will depend on contextual factors of the supply chain and country in question, but will likely be obvious from the company's input, reporting, or submitted documentation what scale the project is at. Generally, pilot projects are ostensibly aiming to prove the viability of an intervention and learn lessons from the experience. Meanwhile a 'scaled up' project/program is more likely to be a longer-term, sustained intervention. However, if it remains unclear from the input/evidence provided, then it could be considered to be a 'smaller scale/pilot project' if the number of beneficiaries of the project is under 2000 in a specific market, unless this is estimated to constitute more than 25% of total number of potential beneficiaries in that market.</p> <p>A supply chain is considered to be 'distinct' if the sites from which the products are sourced are separate.</p> <p>For the purposes of this specific indicator, the <b>Geographic multiplier</b> shall be used as follows:</p>		



	<ul style="list-style-type: none"> <li>- 'Multiple markets' is selected for an example from <i>one</i> country;</li> <li>- 'Globally' is selected for examples from <i>multiple</i> countries;</li> <li>- 'Single market' is not to be used for this indicator.</li> </ul> <p>If the company contributes to a relevant joint program with other industry members, the program as a whole is credited. However, it must be clear that the company's involvement contributes to the part of the program that address malnutrition in the supply chain workers (for example, if the program consists of multiple different workstreams).</p>
	<p><b>Rationale</b></p> <p>Rates of malnutrition, particularly underweight and micronutrient deficiencies, have been found to be disproportionately high among agricultural workers in low- or middle-income countries (LMICs), and particularly among women and smallholder farmers. For such workers, many of the contributing causes of their malnutrition are directly associated with their work. Many of these workers are involved in the production of agro-commodities that are part of the supply chains of food and beverage manufacturers; although not direct employees, these workers are nonetheless very much part of these companies' sphere of influence and, therefore, their indirect responsibility.</p> <p>Interventions delivered through supply chain channels and into the workplace have the potential to be key levers for improving the nutrition and health of these workers, especially since workplace settings are key platforms for delivery of nutrition interventions at scale. Food and beverage manufacturers are therefore encouraged to work with their supply chain partners and support them in developing and implementing workforce nutrition programs (or similar) for their formal and informal (e.g. smallholder farmers) workers.</p> <p>As ATNI found in its <a href="#">Action Research on Workforce Nutrition in the Supply Chains report</a>, companies argued that the business case for doing so is clear: in addition to aligning with their purpose and values, the programs play a role increasing supply chain security and resilience, strengthening relationships with suppliers, mitigating potential reputational risks, and reinforcing other ESG priorities, such as addressing poverty and improving livelihoods, and promoting environmentally-friendly practices, gender equality, and addressing child labor.</p>


## Category F: Labelling

**Category weighting:** 5%

**Total possible score:** 30

No.	Indicator question	Answer options	Score
<b>1.</b>  	Does the company voluntarily provide Back-Of-Pack (BOP) nutrient declarations according to Codex Alimentarius Guidelines (CAC/GL 2-1985) in all markets (unless regulation stipulates otherwise)?  (Tick all that apply)	a. Including all key relevant nutrients: energy value, protein, total carbohydrates, total sugars, total fat, saturated fat, sodium (Article 3.2)	5
		b.1 Quantity expressed per 100g or per 100ml (Article 3.4)	5
		b.2 Quantity only expressed per serving (as quantified on the label) or per portion (provided that the number of portions contained in the package is stated) (Article 3.4)	2.5
		c. No / no information	0
		d. Not applicable	-
	<b>Scoring guidance:</b>  If the company explicitly states that it follows Codex Alimentarius <a href="#">Guidelines on Nutrition Labelling</a> (CAC/GL 2-1985), all options can be selected.  For this indicator, the geographic multiplier is used to adjust the score based on the degree to which the commitment has been implemented across the company's products and markets: if the company confirms that it is applied across all products and all markets (where regulations allow), the multiplier is set to 'globally'; if it is 60-90% 'Multiple markets' is selected; and if 30-60%, 'Single market' is selected.  If specific national requirements as established per law differ from Codex Alimentarius Guidelines (CAC/GL 2-1985) in one or more markets in which a company operates, the indicator applies to all other markets where the company is active without such regulations. If the company is not active in any markets without such regulations, answer option 'd.' is selected, which removes the indicator from the scoring from this category.		

	<p><b>Rationale</b></p> <p>Including comprehensive and transparent information about the nutritional content of a product in the form of ‘nutrient declarations’ is important for enabling consumers to make informed choices when purchasing a product. Doing so in a standardised and objective format can reduce the risk of confusion. As such, <a href="#">92 WHO Member States</a> have adopted mandatory requirements to implement nutrient declarations on all prepackaged food.</p> <p>Meanwhile the Codex Alimentarius <a href="#">Guidelines on Nutrition Labelling</a> (CAC/GL 2-1985) were developed by the World Health Organisation (WHO) and Food and Agriculture Organisation (FAO) as a voluntary international standard and guideline, and set a precedent for food and beverages companies to follow in markets where regulation has yet to be developed or is less strict.</p>		
<p><b>2.</b></p>  	<p>In each market where a voluntary (interpretive) Front-of-Pack (FOP) labelling scheme has been formally endorsed by the government and the company is active, does the company participate and apply the label to all its products?</p> <p>Please provide supporting evidence.</p>	a. Yes, for (nearly) all applicable products per market	10
		b. Yes, for (nearly) all applicable products in some markets and some applicable products in others	7.5
		c. Yes, for some products per market	5
		d. No / no information	0
		e. Not applicable	-
	<p><b>Scoring guidance</b></p> <p>The list of markets with government-endorsed, voluntary FOPL systems can be found here: <a href="https://gifna.who.int/summary/FOPL">https://gifna.who.int/summary/FOPL</a>.</p> <p>‘(Nearly) all’ is considered to be more than 80%. ‘Some’ is considered to be less than 80%. For this indicator, the Geographic multiplier is first applied depending on how many markets the company participates in voluntary FOP schemes (where the company is active), and the answer options are credited according to the degree of implementation in those markets. The ‘Geographic multiplier’ is used to assess whether the company participates in <i>a</i>ll markets where the company has a presence (“Globally”), some (“Multiple markets”), or just one (“One market”).</p>		
	<p><b>Rationale</b></p>		

	<p>The <a href="#">World Health Organisation (WHO)</a> considers FOP labelling “an important policy implementation tool to promote healthy diets through facilitating the consumers’ understanding of the nutritional values of the food and making healthier food choices and drive reformulation by the food industry.” It is therefore a key measure to address obesity and diet related NCDs.</p> <p>In response, at least 28 countries have developed or endorsed FOP labelling schemes, the vast majority of which are voluntary in nature. These have taken a variety of different forms and are underpinned by different nutrient profile models that have been endorsed by these countries’ respective governments; there is currently a lack of international endorsement of a standardised system. Nevertheless, companies are encouraged to participate fully in each voluntary FOP labelling scheme wherever these have been developed in a market the company is active in, given the public health benefit of doing so.</p> <p>When choosing to participate, it is important that the company applies the label comprehensively across its products, since, <a href="#">according to the WHO</a>, there is evidence of voluntary FOP labels being applied selectively to avoid products that contain excessive amounts of nutrients of concern.</p>		
<b>3.</b>  	If the company places nutrition and/or health claims on its products in markets without claims regulation or where regulation is less strict, does it commit:  (Tick all that apply)	a. To follow the ‘Codex Alimentarius Guidelines for Use of Nutrition and Health Claims’ for nutrition claims	2.5
		b. To follow the ‘Codex Alimentarius Guidelines for Use of Nutrition and Health Claims’ for health claims	2.5
		c.1 To only place claims on products meeting the nutrition criteria of an internationally recognised / government endorsed NPM* (or equivalent)	5
		c.2 To only place claims on products meeting the nutrition criteria of its own internal NPM	2.5
		c.3 To only place claims on products according to other nutrition criteria	1.25
		d. No / No information	0
		e. Not applicable (the company commits to not use any health or nutrition claims at all, or claims are regulated in all markets in which it is active)	-

	<p><b>Scoring guidance:</b></p> <p>Only one answer option 'c.' can be selected.</p> <p>Evidence can include a public commitment, or internal documentation which clearly states that this is company-wide policy.</p> <p>*For a full list of government endorsed NPMs please see this scientific review from 2018: <a href="https://doi.org/10.1093/advances/nmy045">https://doi.org/10.1093/advances/nmy045</a>, Table 3; or updated version from 2023: <a href="https://doi.org/10.1016/j.advnut.2023.08.013">https://doi.org/10.1016/j.advnut.2023.08.013</a></p> <hr/> <p><b>Rationale</b></p> <p>Nutrition claims are claims made on nutritional properties of food, and health claims suggest or imply a relationship between a food or a constituent of that food and health.</p> <p>Health and nutrition claims are often used on product packaging and in marketing communications. It is important that such claims are accurate, evidence based, and do not mislead consumers. Such claims should help consumers to make informed choices about what they eat. The use of health and nutrition claims is highly regulated in many high- or middle-income countries, but this is less so in low-income countries. Codex guidelines exist to advise the criteria that health and nutrition claims should meet. Therefore, in countries where no national regulatory system exists, ATNI encourages companies to use health and nutrition claims only when they comply with Codex guidelines.</p> <p>Nutrition and health claims are used to influence purchasing behaviors and food <a href="#">preferences</a>. When claims are used on products with high levels of nutrients of concern, this can result in a <a href="#">"health halo effect"</a> that leads consumers to misunderstand and overestimate their nutritional quality and healthfulness, leading to higher consumption of such products, and thereby greater risk of adverse health effects. It is therefore important that companies have policies in place to not place nutrition or health claims on products without first determining the healthiness of the product by using a government endorsed NPM.</p>
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## Appendix III

### Scoring adjustments for Global Index 2024 companies assessed on BMS and/or CF Marketing Index 2024

Company	BMS and/or CF Index 2024 *	BMS Index 2024 score	BMS adjustment (max. -1)	CF Index 2024 assessment	CF adjustment (max. -0.5)	Total adjustment (max. -1.5)	Global Index 2024 score before BMS/CF adjustment	Final Global Index 2024 score <i>i.e. BMS/CF adjustment applied</i> (% adjustment)
Danone	<a href="#">BMS Index 2024</a> <a href="#">CF Index 2024</a>	23.5%	<b>-0.77</b>	Company sells CF for infants under 6 months of age	<b>-0.5</b>	<b>-1.27</b>	7.41	<b>6.1 (-17%)</b>
Friesland-Campina	<a href="#">BMS Index 2024</a>	37.5%	<b>-0.63</b>	N/A	<b>N/A</b>	<b>-0.63</b>	6.23	<b>5.6 (-10%)</b>
Kraft Heinz	<a href="#">CF Index 2024</a>	N/A	<b>N/A</b>	Company sells CF for infants under 6 months of age	<b>-0.5</b>	<b>-0.5</b>	3.52	<b>3.0 (-15%)</b>
Lactalis	<a href="#">BMS Index 2024</a> <a href="#">CF Index 2024</a>	0.1%	<b>-1</b>	No clear commitment to not sell CF for infants under 6 months of age	<b>-0.5</b>	<b>-1.5</b>	2.17	<b>0.7 (-68%)</b>
Nestlé	<a href="#">BMS Index 2024</a> <a href="#">CF Index 2024</a>	21.2%	<b>-0.79</b>	Company sells CF for infants under 6 months of age	<b>-0.5</b>	<b>-1.29</b>	4.91	<b>3.6 (-27%)</b>
Yili	<a href="#">BMS Index 2024</a>	0.1%	<b>-1</b>	N/A	<b>N/A</b>	<b>-1</b>	4.33	<b>3.3 (- 23%)</b>







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