Global Index 2018

Friesland Campina

Reported product categories

Baby Food, Dairy, Oils and Fats, Juice



Headquarters

The Netherlands

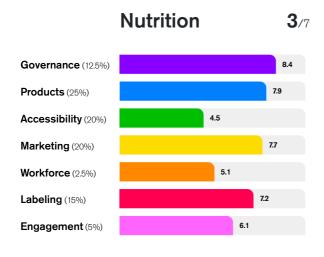
Number of employees 21,927

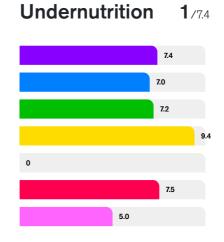
Market capitalization

Not Available (Cooperative structure)

Reported revenue by geography 1 3 Not available

Corporate Profile





Main areas of strength

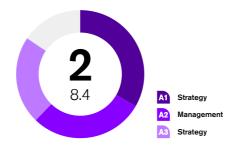
- FrieslandCampina's score has increased from 2.8 in 2016 to 6.0 out of 10 in 2018. The company has achieved the largest increase in score compared to the 2016 Global Index across all companies in the Index and now ranks fourth.
- Through its new 'Route 2020' strategy and 'Nourishing by nature' purpose, the company demonstrates a clear focus on nutrition, including strong commitments to address undernutrition in developing countries. Its updated Nutrition Policy, part of its CSR strategy, is strongly embedded in the company governance structure and integrated into its central commercial strategy.
- FrieslandCampina implemented the Global Nutritional Standards, a new Nutrient Profiling System (NPS) to drive its product reformulation efforts, since the 2016 Index assessment with strong nutritional criteria, based on WHO recommendations according to company information. Although it does not include criteria related to fruits, vegetables, nuts or legumes, it covers both 'positive nutrients' and 'negative nutrients'.
- FrieslandCampina now discloses information about its new 'Broadening access to nutrition' strategy, one of the four pillars of its Nutrition Policy. Despite the fact that it was still under development at the time of assessment, relevant commitments are made to increase the affordability and accessibility of products suitable to prevent and combat undernutrition. The combination of strong commercial performance in developing and marketing milk-based products to undernourished consumers along with relevant philanthropic programs including school milk programs, has made FrieslandCampina the top performing company on undernutrition.
- The Corporate Standard for Responsible Marketing Communications is the company's new responsible marketing policy, which now covers marketing to all consumers in addition to marketing to children. The policy has been published on the corporate website since August 2017, increasing the company's performance substantially compared to 2016.

Priority areas for improvement

- The company's 'Broadening access to nutrition' strategy is under development and concrete objectives are not yet defined regarding affordability and accessibility of healthy products. The company should address this for low-income populations in developed and developing markets.
- FrieslandCampina ranks first on the Product Profile (PP) assessment with a score of 7.7 out of ten. An important limitation is that its main product category, 'Dairy', was assessed in only 2 countries. The company reports to derive 62% of sales volume from healthy products, which is lower than the result of the PP assessment (using a Health Star Rating (HSR) cutoff of 3.5 or more). Despite the company's relatively good performance, there is significant scope to further improve the healthiness of its portfolio.
- FrieslandCampina commits to not perform any marketing activities in primary schools in its updated responsible marketing policy. The company could improve in this area by committing to not perform marketing activities in or near primary or secondary schools, or in other places popular with children.
- FrieslandCampina runs various consumer-oriented education programs, but no evidence was found of independently designed and implemented programs aimed at undernourished consumers, which it should develop.
- The company should commit to implementing an interpretative front-of-pack (FOP) labeling system, covering (and displayed on) all products globally.
- FrieslandCampina ranks fourth on the breast-milk substitutes (BMS) sub-ranking. Its policy commitments align quite closely though not fully to the International Code of Marketing of Breast-milk Substitutes (The Code) and subsequent World Health Assembly (WHA) resolutions, and they are not applied to growing-up milks nor where local regulations are weaker than the company's own policy. In Nigeria various incidences of non-compliance with The Code were found. The company should re-double its efforts to ensure that it complies with its own policy and extend its commitments so that its marketing complies with The Code in all countries, for all products.

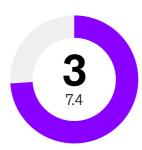
Category Analysis

Category A - Governance 12.5% - Nutrition



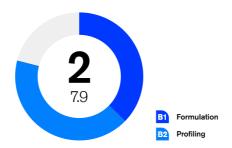
- FrieslandCampina is a strong performer on Category A and has improved its score substantially since 2016 through its new 'Route 2020' strategy. It is connected to the company's purpose, 'Nourishing by nature' and focuses on better nutrition for consumers around the globe.
- The company commits to deliver more healthy foods, and makes a specific reference to low-income populations.
 FrieslandCampina is set to contribute to the Sustainable Development Goals (SDGs), and aligns it policies and programs with the WHO Global Action Plan for the Prevention and Control of Non-Communicable Diseases 2013-2020.
- FrieslandCampina conducts an extensive nutrition-related business risk assessment every two years and factors nutrition-related consideration into decisions on mergers, joint-ventures and acquisitions. For example, a partnership with Engro Foods was started in 2016, Pakistan's second largest dairy producer. FrieslandCampina commented publicly that this enables the company to provide more affordable, healthy products for Pakistan's younger population.
- FrieslandCampina's updated nutrition policy, referenced in its 2016 Annual Report and now fully disclosed on the
 corporate website, guides the company on a broad range of topics of product formulation, marketing, consumer
 education and affordability and accessibility, covering nutrition and undernutrition-related topics. It is transparent by
 publishing a comprehensive set of objectives related to the four pillars of its policy.
- The company seeks external experts' advice on preventing and addressing obesity and diet-related chronic disease on a strategic management level from a panel that is comprised of nutrition experts. The company could improve by extending the panel to include a wider range of expertize and by disclosing the panel setup.
- FrieslandCampina's nutrition policy is part of its CSR policy and firmly rooted in the central governance structure of the
 company as the Executive Board has final responsibility for it. The company could improve its transparency by
 publishing more of its arrangements relating to nutrition governance and how senior management compensation
 relates to nutrition performance.
- FrieslandCampina provides comprehensive and regular nutrition reporting in its annual report and CSR update documents. Evidence that the company's nutrition reporting is subject to external verification is lacking. Furthermore, the company can improve its score by providing separate reports per major market, adapting its approach to the local nutrition and health context.

Category A - Governance 12.5% - Undernutrition



- FrieslandCampina leads the Undernutrition ranking with strong performance across most of the Index categories, including Category A, through commercial and philanthropic initiatives. The company recognizes its responsibility to prevent and combat undernutrition in its publicly available Nutrition Policy. As one of the pillars of this policy, the company, it is developing its 'Broadening access to nutrition' program with the aim of "making foods and the right nutrients available to more people, especially people with lower incomes." This is backed by a Board-level strategic review on the company's commercial opportunities to develop products for the undernourished. The company should disclose further information about this strategy and strategic review.
- The company's commercial undernutrition strategy is focused on two main pillars product formulation (enrichment with nutrients that people need) and broadening access to nutrition (working towards making products to combat undernutrition more affordable and accessible for low-income populations). This strategy is underpinned by its large-scale market research to address nutritional deficiencies in South-East Asia (SEANUTS). The company is in the process of rolling out additional large-scale research in South-East Asia and performs similar research in Africa. Overall, FrieslandCampina's commercial approach to addressing micronutrients, using milk as a base ingredient and fortifying products as needed based on research, is strategic and well-structured, and it addresses relevant populations in higher-priority countries.
- FrieslandCampina's non-commercial strategy for developing countries includes a commitment to support School Milk
 Programs, in addition to other initiatives that are not assessed within the ATNI methodology. It collaborates with the
 Amsterdam Initiative against Malnutrition (AIM) and other (emergency-relief) organizations.
- FrieslandCampina's Executive Board bears the ultimate responsibility for its CSR policy, including the 'Broadening access to nutrition' program. The company discloses this information publicly, as well as the fact that its Corporate Sustainability department is responsible for development and coordination of the CSR policy, which includes its Nutrition Policy and approach to addressing undernutrition.
- There is no evidence of a formal expert panel that advises senior management on the undernutrition strategy, although the company has an ad-hoc interaction with relevant experts. The company is encouraged to form a formal panel with a wide range of expertize for regular consultations on the company's strategy and ongoing programs.

Category B - Products 25% - Nutrition



- FrieslandCampina commits to invest in R&D to develop healthier products. The company commits to ensure that a minimum of 65% of its products, by sales volume, meet its healthy criteria by 2020, but no financial R&D commitment is provided. The company should set a target to meet its nutritional criteria for 100% of its products.
- The company reports that 62% of its products met its own nutritional criteria by 2016, an increase of more than 10% compared to 2014. FrieslandCampina is commended for disclosing these percentages, showing the increase in products meeting its healthy criteria over the last three years on its corporate website.
- FrieslandCampina's reported percentage of healthy products, based on sales volume, is lower than the result of the
 Product Profile assessment. Although the comparability is limited as only two non-major markets were covered in the
 Product Profile, there is no indication from the current data that FrieslandCampina is overestimating the percentage of
 healthy products.
- FrieslandCampina does not disclose the percentages of products that meet criteria for being suitable to be marketed to children for which it applies EU pledge criteria. In addition, the company does not offer healthy product choices across all of its brands. The company could improve its score in these aspects.
- FrieslandCampina implemented a new NPS since the 2016 Index assessment, the FrieslandCampina Global Nutritional Standards, to guide its product development and reformulation efforts. The company reports it was adapted from an existing framework that is based on WHO recommendations. Overall, the NPS is well-designed, it assesses both 'positive' and 'negative nutrients' and is applied to all products and product categories. As a result, the company earns the maximum healthy multiplier. FrieslandCampina's NPS is publicly disclosed on its website.
- Related to the nutritional criteria in FrieslandCampina's NPS, the company has a comprehensive set of product
 reformulation targets to reduce relevant 'negative nutrients'. The 'positive nutrient' criteria included in its NPS does not
 cover fruits, vegetables, nuts and legumes, which are relevant according to ATNI methodology for the 'Dairy' product
 category (except for 'plain dairy' products). FrieslandCampina could increase its score by addressing this, and more
 importantly by increasing the percentages of products that meet its reformulation targets.

Category B - Products 25% - Undernutrition



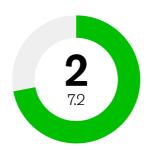
- FrieslandCampina commits to tackling undernutrition and micronutrient deficiencies in developing countries through
 initiatives that aim to increase the number or volume of relevant products, based on milk, available to undernourished
 populations. However, it does not have a target to increase R&D spending on developing suitable products, nor does it
 make an explicit commitment to basing the company's approach to fortification on international guidance (i.e. CODEX
 CAC/GL 07-1987). Although the company reports to always follow Codex guidance, it should express this commitment
 clearly and publicly.
- The company provides extensive commentary, published (in part) on the website, about the use of milk in its approach to address malnutrition, which is fortified as needed based on nutritional deficiencies to address. Specific references to particular micronutrients (vitamin A, D, calcium, protein and others) are made and quality control is implemented in relation to these nutrients, indicating a commitment to use ingredients with high inherent levels of micronutrients in addressing undernutrition. In addition, the company commits to use only products of high nutritional quality as a basis for fortification in addressing undernutrition.
- The company provided evidence of having developed new products in recent years to address undernutrition in children over the age of three (considered appropriate for a company that sells BMS products), based on fortified milk and condensed milk products. In addition, it has funded preschool milk programs aimed at addressing stunting and body composition in the same populations. The commercial and non-commercial activities are performed in higher-priority countries such as Indonesia, the Philippines, Myanmar, Vietnam and Nigeria. The company should improve its transparency by disclosing more information about its non-commercial and commercial undernutrition activities.

Category C - Accessibility 20% - Nutrition



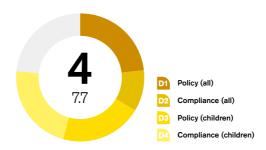
- FrieslandCampina discloses in its 2016 CSR Report its pledge to feed the growing global population by making its 'sufficiently nutritious and energy-rich food' not only available but also affordable. In addition, the company mentions it is working on its new 'Broadening access to nutrition' strategy that is aimed at making foods and the right nutrients available to more people, especially people with lower incomes. Commitments in this strategy are relevant in relation to the affordability and accessibility of healthy foods for low-income populations in general. It is also relevant for addressing undernourished consumers, which is addressed in the undernutrition section of the scorecard. In total, the company's score in Category C improved due to the new developments compared to 2016.
- Since the policy was still under development at the time of assessment, concrete objectives were not yet defined. The
 company is encouraged to define and publish these, together with its finalized policy on the accessibility and
 affordability of healthy products for low-income populations in both developed and developing markets. In addition, the
 related managerial accountability and day-to-day responsibility arrangements should be disclosed.
- The company provided evidence of having performed analysis on appropriate pricing of healthy products for low-income populations in developing countries such as Nigeria, the Philippines and Indonesia. The company can improve its score by extending the scope of its analysis of appropriate pricing of healthy products to include developed markets and by providing evidence that products meeting healthy criteria are promoted more than products not meeting these criteria.

Category C - Accessibility 20% - Undernutrition



- FrieslandCampina's commercial 'Broadening access to nutrition' program includes a commitment to improving the
 affordability and accessibility of its products that address micronutrient deficiencies. Despite the fact that this program
 is still under development and does not yet have concrete objectives, FrieslandCampina ranks second in its approach to
 improve affordability and accessibility in relation to undernutrition. It demonstrates evidence of relevant activities and
 commercial as well as philanthropic programs.
- The company demonstrated a number of examples of improving affordability of fortified products, related to the Peak
 Wazobi brand in Nigeria and the Alaska brand in the Philippines. The company offers small packages of fortified
 evaporated milk products at specific price points that are within reach of undernourished consumers. This information is
 partially disclosed on local companies' websites.
- Examples of improving the accessibility of products specifically formulated or appropriate for specific undernourished
 groups were provided by the company for the high-priority countries Indonesia and Nigeria. FrieslandCampina made
 use of a variety of channels suitable to reach the relevant consumers, including mobiles sales, indirect distribution,
 periodic markets, etc. The company discloses information on expanding its distribution network in Myanmar in its 2016
 Annual Report.
- Non-commercially, FrieslandCampina funds programs that improve the accessibility of relevant products through
 providing products to school feeding programs and providing products to be distributed to undernourished populations,
 working with UNICEF in Nigeria. The company provides a commentary on its activities on its corporate website.

Category D - Marketing 20% - Nutrition



- FrieslandCampina has substantially increased its score in Category D by updating its FrieslandCampina Corporate
 Standard for Responsible Marketing Communications. The new policy now extends beyond responsible marketing to
 children by covering marketing to all consumers. Furthermore, the policy has been published on the corporate website
 since August 2017.
- The document addresses a broad set of media channels to which the company applies its responsible marketing policy. However it excludes packaging and point-of-sale marketing from its definition, thereby also excluding it from its approach to all consumers. In addition, outdoor marketing is not mentioned. FrieslandCampina should be explicit in covering all relevant channels and should not exclude packaging and point-of-sale marketing from its commitments.
- FrieslandCampina reported to ATNF that it performs a regular, structured survey as an internal audit, covering
 marketing to all consumers (as well as marketing to children). A retrospective assessment of marketing
 communications was done, with a commitment of corrective action if needed. The company should strengthen its
 auditing approach by outsourcing it to a third-party.
- FrieslandCampina does not market to children under the age of six, except for milk and cheese products that comply with specific criteria. For children aged 6-12, the company only markets products that meet nutritional criteria for marketing towards children. Demonstrating best practice, the company now applies an audience threshold of <25% for its marketing to children under 12. The policy contains a strong set of commitments and utilizes a robust set of tools to ensure that its online marketing does not inappropriately address young age groups. There is room to improve by strengthening commitments regarding own and third-party fantasy characters, by ensuring that marketing materials contain an educative message in relation to healthy diets and lifestyles, and by a clear commitment that promotional games, toys, vouchers etc. are only used in relation with healthy foods.
- The company is committed to refrain from marketing activities in primary schools. However, the company should extend this commitment to places near primary schools, in or near secondary schools and to other places popular with children. In addition, industry-leading practice extends responsible marketing commitments beyond the age of 12.
- FrieslandCampina's policy is aligned with the EU Pledge Nutrition Criteria and compliance is audited through the pledge organization. FrieslandCampina is commended for disclosing its individual auditing results on its website and achieved good compliance results in the last auditing cycle. For industry best-practice performance, the company should commission complementary independent third-party audits.

Category D - Marketing 20% - Undernutrition



- FrieslandCampina is the top-ranking company on marketing related to undernutrition. It makes an explicit and public commitment to developing and delivering marketing strategies appropriate to reaching undernourished populations in developing countries as part of its 'Broadening access to nutrition' commitment.
- The company applies various approaches to marketing in order to understand and reach undernourished consumers in developing countries with appropriate products. For example, the company reported for its WAMCO operation in Nigeria to use multiple communication channels from mass to social media in order to reach undernourished consumers. In addition, the company is involved in various research initiatives and works together with behavioral specialists to shape communications to drive desired behavior change.

Category E - Workforce 2.5% - Nutrition



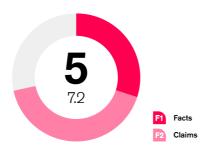
- FrieslandCampina offers an employee-centered health and well-being program called BOEST, which includes both diet and lifestyle components and is implemented now in the home market (it was in a setup phase for the 2016 index assessment). Other programs are in place in other geographies, including in Greece, Indonesia and the Middle-East.
- Expected health outcomes of its employee health and well-being program are articulated and participation rates are
 monitored, with a goal to extend the reach of the program by 2020. FrieslandCampina shows leading practice in its
 home market by having the health outcomes of its program independently evaluated by a third-party. The company
 could further improve on employee health and well-being by ensuring programs are available to all employees and
 family members, by articulating expected business outcomes and by disclosing more information about its programs
 and their results.
- FrieslandCampina does not have a policy in place to arrange the support of breastfeeding mothers beyond local regulations. The company should adopt a global policy that arranges six months or more of paid maternity leave and a full set of facilities and arrangements to support breastfeeding mothers. Currently, flexible working arragnements and facilities to perform breastfeeding are offered in various, but not all, countries the company is active in.
- FrieslandCampina develops and supports consumer-oriented education programs about healthy nutrition and lifestyles, committing to align to national dietary and physical activity guidelines as stated on its website. The company supports programs developed and implemented by independent groups, such as a program to stimulate healthy diets through taste exploration lessons at schools, developed by Wageningen University in the Netherlands. In addition, the company implements its own programs such as the Drink.Move.Be.Strong program in East-Asian countries. FrieslandCampina should strengthen its approach by excluding brand-level sponsorship of consumer-orientated programs. It should also commit to work with independently designed, implemented and evaluated programs exclusively, disclosing the results.

Category E - Workforce 2.5% - Undernutrition



- Although FrieslandCampina runs consumer-oriented educational programs on healthy diets and lifestyles in developing
 countries including Indonesia, the Philippines and others, there is no evidence that the company focuses on educating
 undernourished consumers in developing countries. The general educational programs are assessed in Category E
 Nutrition.
- FrieslandCampina should commit to supporting independently designed programs educating undernourished consumers about the importance of consuming fortified foods or foods inherently high in micronutrients and healthy diets.
- It is recommended to publish its commitments as well as the content and results of the programs they support.

Category F - Labeling 15% - Nutrition



- FrieslandCampina commits to disclose nutritional information on the FOP and back-of-pack (BOP), described in its
 Corporate Standard for Nutritional Information. It is one of two companies in the 2018 Index to commit to providing all
 relevant nutrients according to the ATNI methodology. In addition, the contribution of nutrients in relation to the daily
 reference intake is provided FOP and serving or portion is always provided in addition to nutrient information per 100g
 or per 100ml basis.
- The company commits to place the Choices logo in markets where it is legally allowed. However, this is not recognized
 as an interpretative FOP labeling system in the ATNI methodology. The company should commit to implementing a
 system that is displayed on all products. Like all companies, FrieslandCampina should ensure to not undermine existing
 local interpretative FOP labeling systems by implementing alternative or additional systems.
- FrieslandCampina is commended for disclosing information on full implementation of its labeling commitments globally
 on its corporate website. However, the company can improve its score by increasing the number of markets with full
 implementation of its commitments.
- The company commits to apply health and nutrition claims to products in compliance with Codex guidelines in absence of local regulations. It tracks the number of products that meet its healthy standard and carry health and nutrition claims. FrieslandCampina can improve its transparency in this area by disclosing its policy on health and nutrition claims. As well, it should disclose the number of products carrying nutrition and health claims and disclose whether any complaints have been upheld against it about the misuse of health or nutrition claims.

Category F - Labeling 15% - Undernutrition



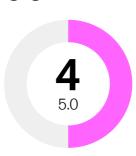
- The new FrieslandCampina Corporate Standard for Nutritional Information, disclosed on the corporate website, contains the commitment to labeling products that fortified micronutrients are always labeled (if legally allowed). This commitment applies to all products globally, including products for undernourished consumers.
- Similarly, the company's policy on health and nutrition claims is applied worldwide and covers all the company's
 products, including those aimed at undernourished consumers. Therefore, in the absence of local regulations,
 FrieslandCampina commits to using nutrition or health claims on products that have been fortified only when they meet
 Codex standards. The company is encouraged to publish this commitment and to state unambiguously that Codex
 standards will be applied as a minimum standard in all situations.

Category G - Engagement 5% - Nutrition



- FrieslandCampina has published its 'Compass' document since 2016, describing good business conduct guidelines.
 This document (or any other policy) does not contain a commitment to only engage with governments, political parties, policymakers and policymaking bodies in support of measures to prevent and address obesity and diet-related chronic diseases. The company should make this commitment.
- FrieslandCampina discloses relevant information about its membership of industry associations or other organizations
 that lobby on its behalf, about potential governance conflicts of interest and about board seats with influential
 organizations. It can further increase its transparency by disclosing commentary on its lobbying measures to prevent
 and address obesity and diet-related chronic diseases. It should also disclose its positions used in lobbying, as these
 relate to nutrition (e.g. in relation to FOP labeling).
- In its CSR update 2016, the company commits to engage with a wide range of relevant stakeholders, who were identified in the process of a materiality analysis. The engagement with local and international stakeholders is comprehensive and well-structured. FrieslandCampina discloses information about the topics that were addressed in stakeholder engagement in its CSR update 2016. It could improve further by disclosing examples of how input has been used to adapt policies or programs, leading to a change in business practices.

Category G - Engagement 5% - Undernutrition



- FrieslandCampina's 'Compass' document states that the company will work together with governments, institutes and other organizations to "bring better nutrition to the world" wherever it is active in the world. It also links this general commitment to its commitment to prevent and combat undernutrition (and other diet-related non-communicable diseases). Although the company could improve the clarity of its commitment by mentioning developing countries explicitly, this is accepted as a commitment to play an active and constructive part in supporting governments' efforts to address undernutrition.
- The company, via feedback, provided two examples of how it supported governments of developing countries to
 introduce a policy or regulation to address undernutrition, in Indonesia and Nigeria. Its research findings were used in
 government guidelines and helped enable governmental school feeding programs. The company should increase its
 transparency by disclosing its activities publicly.

Product Profile



Rank 1 / Score 7.7

Average HSR score products (sales-weighted)	Percentage of healthy products (sales-weighted)	Percentage of healthy products suitable to market to children (sales- weighted)	Number of products included in HSR and WHO EURO assessments		Number of countries included in the assessment
			HSR	WHO EURO	
3.8 stars	89%	41%	24	24	2

- FrieslandCampina's average sales-weighted HSR is 3.8
 (3.5 unweighted), generating a Product Profile score of 7.7 out of 10, and it ranks first among the companies assessed.
- 89% of its sales of the products assessed were estimated to meet the healthy threshold (75% of its products by number). The proportion of its sales of products assessed suitable to be marketed to children was estimated to be 41% (29% of its products by number). FrieslandCampina's products assessed all fall within the 'Dairy' category. Therefore, the difference between sales-weighted and unweighted data is based only on differences in estimated sales between the two countries included in the analysis.
- The average HSR was higher in the U.K. (4.1) than in Hong Kong (3.2), as was the percentage of products meeting the healthy threshold of 3.5 (100% and 63%, respectively) and the percentage of products suitable to be marketed to children (50% and 19%, respectively).
- Hong Kong and the U.K. were the only countries in which FrieslandCampina products were identified for analysis; the company does not have relevant activities in the seven other markets included in the Product Profile assessment. FrieslandCampina's main markets were not covered in the assessment, as only 2% of its global sales were estimated to be covered. This is an important limitation of the assessment, as only a small part of the company's products was covered. On the other hand, 'Dairy' is FrieslandCampina's single dominant product category globally and, therefore, the company is well-represented on the product category level.
- FrieslandCampina ranks fourth on the 2018 Global Index (third on the Corporate Profile without BMS adjustments), showing strong improvements compared to 2016 and demonstrating a strong focus on nutrition and health. The results of the Product Profile assessment, with the caveat of not covering the company's main markets, are consistent with the company's strong performance overall. On the same basis of limited data, there is no evidence that the company overestimates the healthiness of its products. Still, FrieslandCampina has room for further product reformulation. It should aim to increase the healthiness of its products as measured by the average HSR, as well as by the percentage of products that meet the nutritional criteria for suitability to be marketed to

For full details, see the company's Product Profile scorecard.

Breast-milk Substitutes (BMS) Marketing



Rank 4 / Score 25%

Rank	BMS Marketing	Adjustment to Global Index Score	BMS 1	BMS 2	Level of compliance in country studies	
		Max. of - 1.5			Thailand	Nigeria
4	2.5%	1.12	51	0	NA	Low

- FrieslandCampina is one of four Index companies included in the BMS Marketing sub-ranking. Its score is based on two assessments: BMS 1 which assesses the company's BMS marketing policy commitments, management systems and disclosure and BMS 2 which assesses its marketing practices in Nigeria during 2017. The company was not included in the Thailand study as it does not sell its products there.
- FrieslandCampina ranks fourth overall in the BMS subranking with a level of compliance with the ATNI methodology of 25%.
- In September 2017, FrieslandCampina published its new policy, the wording of which, compared with the previous policy, is even more closely aligned to The Code.
 Moreover, it applies in all countries, higher and lower risk, although only when local regulations are absent.
 Where they are in force, FrieslandCampina follows those regulations, unless certain provisions are missing, in which case it follows its own policy commitments.
- Its policy commitments related to Articles 5, 7, 8 and 10 are fully in line with The Code. As the other companies assessed, it omits full commitments linked to WHA resolution 58.32 to provide information and labeling regarding the potential presence of pathogenic microorganisms in its products and in other materials. The policy also has gaps in respect of the approval of donations. Thus, its final score on BMS 1 is 51%.
- To improve, FrieslandCampina could extend its policy to include growing-up milks and could revise it to encompass all of the recommendations of the WHA resolutions (including WHA 58.32 and 69.9). Putting in place a full set of consistent management mechanisms, such as procedures linked to each of its commitments, would also increase its performance.
- In the study of marketing practices in Nigeria, it scored 0% as it was found to have only a low level of compliance with The Code and local regulations.
- To bring its marketing practices into line with The Code in Nigeria, FrieslandCampina should ensure that all of its product labels include all necessary information. It should also take steps to ensure that all those selling its products online – including small traders, do so in compliance with its policy prohibiting point-of-sale promotions.

Disclaimer Global Index 2018

General Disclaimer

As a multi-stakeholder and collaborative project, the findings, interpretations, and conclusions expressed in the report may not necessarily reflect the views of all companies, members of the stakeholder groups or the organizations they represent or of the funders of the project. This report is intended to be for informational purposes only and is not intended as promotional material in any respect. This report is not intended to provide accounting, legal or tax advice or investment recommendations. Whilst based on information believed to be reliable, no guarantee can be given that it is accurate or complete.

Sustainalytics participated in the data collection and analysis process for the Global Index 2018, contributed to the company scorecards and supported writing the report.

Westat is responsible for the collection of data related to company compliance with the International Code of Marketing of Breast-milk Substitutes and any additional country specific regulations related to marketing of these products in Bangkok, Thailand and Lagos, Nigeria. Westat is responsible for the analysis of the data related to compliance with the BMS Marketing standards and for the preparation of its final study report, the results of which have been incorporated by ATNF into the 2018 Global Access to Nutrition report and the scoring of company performance for the same Index.

The George Institute for Global Health (TGI) is

responsible for the data collection for the Product Profile assessment, using data from available databases that was supplemented with data provided by companies to ATNF. TGI is also responsible for the analysis of the data related to the Product Profile and the TGI Product Profile final report, the results of which have been incorporated by ATNF into the 2018 Global Access to Nutrition report. Furthermore, TGI is responsible for the data collection and analysis related to the historic sodium reduction assessment in Australia, the results of which have been incorporated into the Product Profile chapter of the 2018 Global Access to Nutrition report.

Innova Market Insights (Innova) is responsible for the data collection and analysis related to the historic sodium reduction assessment that was performed in four countries, the results of which have been incorporated into the Product Profile chapter of the 2018 Global Access to Nutrition report.

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Footnotes

- 1. FrieslandCampina was evaluated on the BMS sub-ranking and its Global Index score was adjusted by -1.1 to reflect its I evel of compliance with the BMS methodology of 25%. Scorecard version 2, 31 October 2018.
- 2. Source: Morningstar, USD historic exchange rate
- 3. Source: Morningstar