



Global Index 2021

Custom Report

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ATNI is pleased to present the fourth iteration of the Global Access to Nutrition Index, following on from editions published in 2013, 2016, and 2018.



“As the 25 largest food and beverage manufacturers, each must take responsibility to deliver healthy product offerings to consumers across the globe and not leave nutrition behind. That’s no small task – but it’s one that requires action urgently if we are to deliver on the Sustainable Development Goals to end world hunger and ensure good health and well-being. We’ve seen the fragility in supply chains in the last three years, but we’ve also seen some companies using this as an opportunity to innovate. With an increasing demand from consumers for healthy products, there is an opportunity for manufacturers to take on this new-found responsibility, to use the new post-COVID-19 reality to enable healthier diets for all.”

Inge Kauer
Executive Director Access
to Nutrition Foundation

This Index, like its predecessors, assesses how the world’s largest global food and beverage (F&B) manufacturers contribute to addressing malnutrition in all its forms: overweight and obesity, undernutrition, and micronutrient deficiency. Together, the Global Indexes are an important tool to advance ATNI’s vision of a world in which no one goes to bed hungry, and everyone eats a healthy, affordable diet that has all the nutrients and food groups needed to grow and develop fully in good health. As a result, death and illness from diets low in essential vitamins and minerals would be confined to history.

Twenty five leading F&B manufacturers are included in the 2021 Global Index. All have been assessed on their commitments, practices, and disclosure – with regards to governance and management; the production and distribution of healthy, affordable, accessible products; and how they influence consumer choices and behavior.

There are several changes compared to the previous Global Index. In 2018, undernutrition was presented in a separate section; now, policies and actions targeting priority populations at high risk of malnutrition are woven throughout. Also added into the Index this year (as criteria B1) is a section assessing and scoring the healthiness of companies’ product portfolios, their performance within product categories among peers, and changes over time. You can find the full methodology, and details on the changes, [here](#).



Furthermore, previous Global Indexes incorporated a sub-ranking that assessed the marketing policies and practices of the world's largest makers of breast-milk substitutes (BMS). For the 2021 edition, ATNI has published this assessment as a stand-alone Index and extended it to include an evaluation of the marketing of complementary foods (CF). The BMS/CF Marketing Index 2021 has been expanded from the six largest to the nine largest companies in this sector, by global revenues. Six of these companies are constituents of the Global Index 2021, and their final Global Index score depends in part on their BMS/CF Marketing Index 2021 score.

The Global Index is used by an increasing number of interested parties (policymakers, investors, international and non-governmental organizations (NGOs), and others) to hold the private sector accountable in delivering on commitments to tackle growing nutrition challenges worldwide. These challenges have never been more evident, as the COVID-19 pandemic has widened inequities, increased poverty, and impacted on malnutrition in all its forms. Despite the progress made over the last two years, as shown by this Index, companies still need to do much better by putting in place even stronger commitments to improving food systems and fighting malnutrition. With 2021 being the Nutrition for Growth Year of Action, now is the time for F&B manufacturers to step up, scale up, and make a difference to healthier diets for everyone, everywhere.

ATNI invites you to share the Global Index 2021 across your networks – and please do not hesitate to get in touch if you have any questions.

Ranking

Overall, the 2021 results show that companies need to enhance their efforts to encourage healthier diets for all. The average score remained the same as 2018, at 3.3 out of 10. All 10 leading companies, except for Arla, scored lower than in the 2018 iteration, while most companies in the middle and lower rankings scored slightly higher. Similar to 2018, Nestlé leads the 2021 rankings with a score of 6.7 out of 10. The company achieves a top-three rank in all categories of the Index and rates first in 'Governance' and 'Engagement'. Unilever comes second with 6.3, and FrieslandCampina third with 5.9. Arla showed a big improvement from 3.3 in 2018 to 5.1 in 2021, securing a rank of fifth in the Index; in part due to a new labeling policy, responsible marketing policies, and an improvement in healthiness of its product portfolio. Meanwhile, Meiji rose five places in the Index, partially due to its incorporation of a nutrition strategy in its CSR vision and new policies aimed at marketing to children and labeling.

A Governance **B** Products **C** Accessibility **D** Marketing **E** Lifestyles **F** Labeling **G** Engagement

BMS Assessed in the BMS/CF Marketing Index 2021. An adjustment based on the BMS/CF Marketing Index score is incorporated into the overall Global Index 2021 score.

* Did not provide information to ATNI

Methodology

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Please find more information on our methodology and changes in this on the Methodology page.

Methodology: <https://acesstonutrition.org/index/global-index-2021/methodology/>

Company scorecards

The 25 largest global food and beverage manufacturers were selected for inclusion in the 2021 Global ATNI based on 2018 companies' publicly reported and self-reported sales revenues combined with estimated retail sales of packaged food and beverage products worldwide.



Ajinomoto



Arla



BRF



Campbell



Coca-Cola



Conagra



Danone



Ferrero



FrieslandCampina



General Mills



Grupo Bimbo



Kellogg



KDP



Kraft Heinz



Lactalis



Mars



Meiji



Mengniu



Mondelez



Nestlé



PepsiCo



Suntory



Tingyi



Unilever



Yili

The Global Context

The Malnutrition Crisis

The triple burden of malnutrition indicates the tragic coexistence of these three conditions: overweight and obesity, undernutrition and micronutrient deficiencies.

The report explores impact of Covid-19 on: overweight and obesity, micronutrient deficiencies and undernutrition.

In 2019, only two in five children globally were exclusively breastfed at the crucial age of 6 months.

Overweight and obesity, undernutrition and micronutrient deficiencies represent a heavy burden to economic development globally: their material cost is estimated at 5% of global income or US\$3.5 trillion per year.

The state of overweight and obesity in the world

Overweight and obesity are the most widespread forms of malnutrition globally: these conditions, defined by a body mass index (BMI) equal to or greater than 25 and 30, respectively, are associated with a greater number of deaths worldwide than undernutrition. In every region of the world, apart from sub-Saharan Africa and Asia, there are more people living with obesity than those who are underweight.

The number of people who suffer from overweight and obesity has nearly tripled since 1975 and keeps rising. In 2016, 13.1 percent of the global adult population was overweight or obese, an increase from 11.8 percent in 2012. Once thought to be a high-income country issue, today overweight and obesity affect most countries in the world, with over 70 percent of adults living with obesity found in low- or middle-income countries.

Child obesity is witnessing similar upward trends. In 2019, 5.6 percent of the world population under the age of 5 was overweight or obese, a slight increase since 2012. This trend represents a challenge for [Global Nutrition Target 4](#), which aims to put an end to the rise of overweight children by 2025. Only four years away from this target date, the world is not on track to deliver on it.

According to estimates by the Potsdam Institute for Climate Impact Research, by 2050, 45 percent of the world population will be overweight or obese. Several reasons can account for the dramatic increase in the prevalence of obesity. Increasingly sedentary lifestyles have been accompanied by a greater availability of calorie-rich foods without increased access to healthier food options: food supply chains have been geared to supply quantity calories rather than nutrients. As a result of rising consumption of energy-dense, nutrient-poor diets, overweight and obesity today are also associated with poorer micronutrient status. This calls for actions that target overweight and obesity not as stand-alone issues, but as the result of systemic failures in the global provisioning of healthy diets.

The nutrition transition

Originally theorized by American academic Barry Popkin in the 1990s, the nutrition transition indicates changes of dietary patterns – determined by economic developments and food processing techniques – from ‘collecting food’ to ‘famine’, ‘receding famine’, ‘degenerative diseases’ and finally to ‘behavioral changes’, the last pattern being defined by the desire to improve health.

Plenty of evidence today supports the concept of a nutrition transition towards global diets with high intakes of increasingly available and affordable nutrient-poor, calorie-rich foods (i.e. the ‘degenerative diseases’ phase). This transition, the result of income growth, demographic changes, urbanization and new patterns of food distribution, is associated with rising proportions of the global population suffering from overweight, obesity, and diet-related non-communicable diseases.

There is initial evidence suggesting that diets rich in ultra-processed foods (UPFs) – which are rapidly rising in low- and middle-income countries and are already a significant proportion of the diets in some high-income markets such as the US, Canada and the UK – are associated with higher risk of obesity, diabetes and other diet-related diseases. The rising consumption of these highly palatable and cheaply available foods denotes the current stage of the nutrition transition. A better understanding of the relationship between the level of food processing and product healthiness, as determined by a robust Nutrient Profiling Model (NPM), is needed to establish which characteristics of UPFs of low underlying nutritional value can represent a risk to public health.

There is yet no evidence, however, to support the theory of a widespread, global transition to dietary patterns aimed at improving health outcomes. To ensure that the last stage of the transition does occur, there is a need to ensure that nutrient-rich foods are not only available, but also affordable, appealing, and aspirational.

The impact of COVID-19 on overweight and obesity

The relationship between COVID-19 and obesity has been extensively researched since an association between obesity and worse health outcomes of the novel coronavirus was first detected in early 2020. A March 2021 study by the World Obesity Federation provides a detailed account of how overweight and obesity have been significant factors in determining risks of hospitalization, intensive care, and death from COVID-19 globally. In countries where less than half of the national population is overweight, the likelihood of dying from COVID-19 has been about a tenth of that seen in countries where the majority of the population is overweight.

The COVID-19 and overweight/obesity relationship, however, is not unilateral. As a result of lockdown restrictions worldwide, new trends such as increased snacking, stress eating and reduced exercise have triggered experts' warnings about potential increases in adult obesity.

Similarly, all forms of child malnutrition, including obesity, are expected to worsen as a result of the pandemic: lockdown eating and school closures have significantly deprived children of healthy eating and exercising routines. A closer monitoring of obesity trends post-pandemic will be needed to fully understand the magnitude of this impact.

The state of undernutrition in the world

In 2019, 690 million people, or 8.9 percent of the global population, were undernourished, and 2 billion people were food insecure – these numbers have been rising since 2014 and will continue to rise, partly as a result of the COVID-19 pandemic.

Amongst the categories of people most vulnerable to undernutrition are children: in 2019, 21.3 percent of children under 5 years of age were stunted, or too short for their age, and 6.9 percent were wasted, or too thin for their height. Stunting and wasting are two different manifestations of undernutrition and can, respectively, lead to impaired physical and mental development and heightened risk of death.

The growth in global prevalence of undernourishment, as well as in food insecurity witnessed in recent years, marks the continuation of the trend of rising hunger which started in 2014, when decades-long progress towards achieving [SDG2 Zero Hunger](#) started being reversed. As a result of conflict, poverty, and climate change, the world was not on track to achieve SDG2 by 2030 before Covid-19.

Compounded by the economic fallout of the pandemic, conflict and climate extremes are exacerbating the already dire state of undernutrition globally. In March 2021, a joint statement by the United Nations Food and Agriculture Organization (FAO) and the World Food Programme (WFP) warned that 34 million people are in the emergency phase of food insecurity, or 'one step away from starvation'.

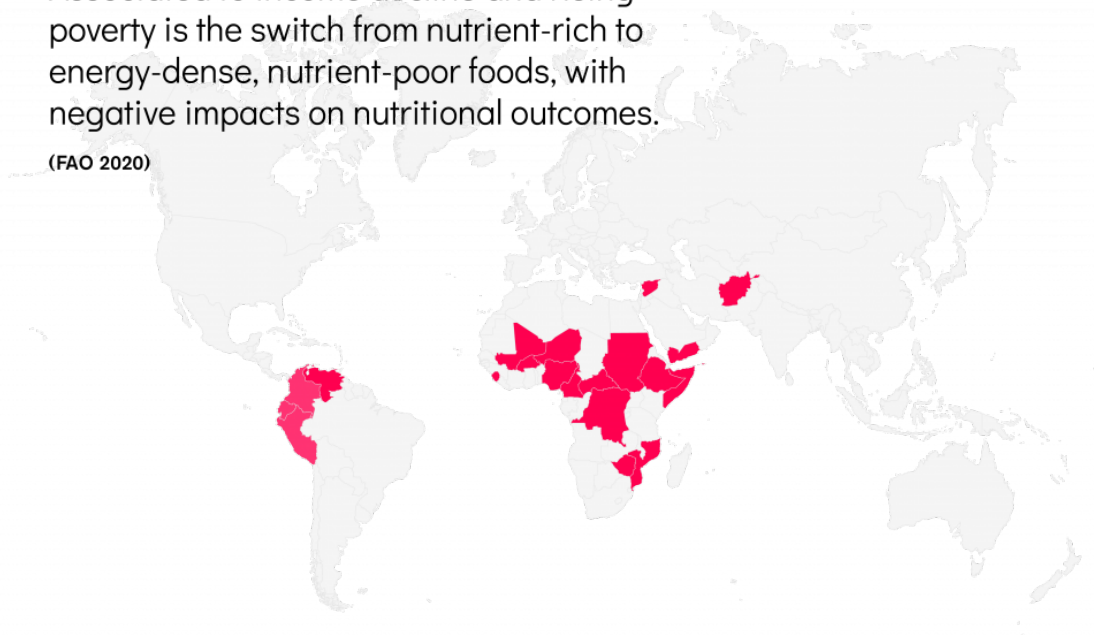
To fulfil the global [sustainable development agenda](#) and meet the [Global Nutrition Targets](#), efforts to combat undernutrition must increase significantly.

The Covid-19 pandemic would result in approximately 150 million more people falling below the extreme poverty line. Associated to income decline and rising poverty is the switch from nutrient-rich to energy-dense, nutrient-poor foods, with negative impacts on nutritional outcomes.

(FAO 2020)

Map of acute food insecurity hotspots

● acute food insecurity hotspots



The cost of a healthy diet

Several metrics exist that assess hunger worldwide: The Prevalence of Undernourishment, the Food Insecurity Experience Scale, the Integrated Food Security Phase Classification and many more. Whilst measures of hunger are necessary to understand the scope of undernutrition, in recent years new metrics have been used to assess the scope of malnutrition as a whole. Among these is the cost of a healthy diet.

A healthy diet is not only one that provides sufficient energy, but also one that balances energy intake with energy expenditure through an active lifestyle, one that provides all nutrients and micronutrients needed to nourish the human body and one that has a certain degree of dietary diversity.

The FAO estimates that healthy diets cost 60 percent more than diets which meet bare minimum nutrient requirements and almost 5 times as much as energy-dense diets which meet dietary energy requirements only – this trend is witnessed in all regions of the world, although it affects a greater percentage of the population in low- and middle-income countries where people spend a greater proportion of their income on food. At the global level, this has resulted in 3 billion people not being able to afford a healthy diet and 1.5 million people not being able to afford a merely nutrient-adequate diet.

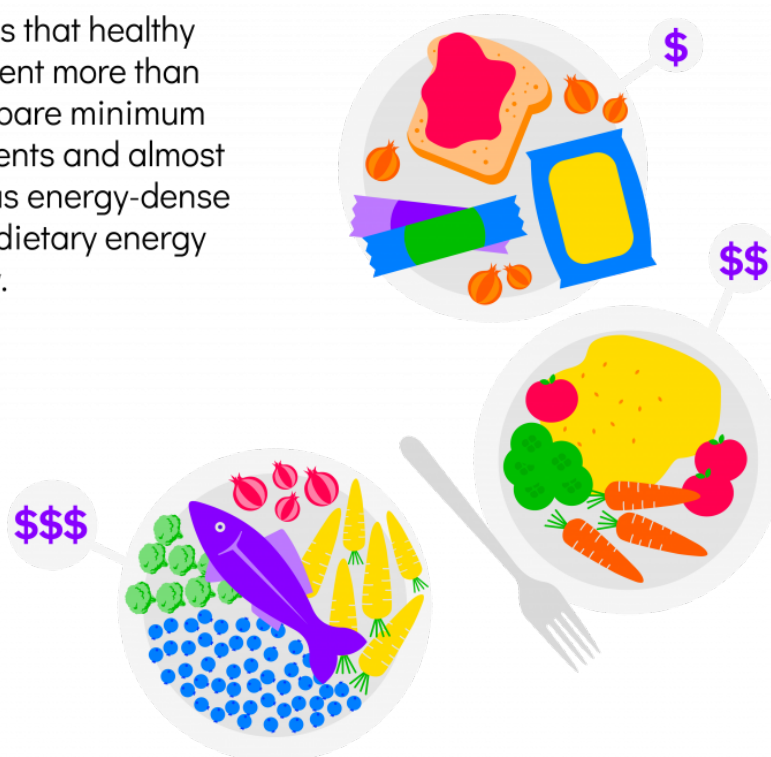
The impact of COVID-19 on undernutrition

The dramatic effects of the COVID-19 pandemic on food and nutrition security are, by now, well documented.

In July 2020, the FAO estimated that COVID-19 might increase the number of undernourished people in the world by anything between 83 and 132 million, depending on prospects for global economic recovery. Estimates made at the early stages of the pandemic, however, may no longer be accurate, as new evidence shows that pandemic effects might reach further than expected. A December 2020 study by the International Food Policy Research Institute (IFPRI), for instance, estimated that the COVID-19 pandemic would result in approximately 150 million more people falling below the extreme poverty line. The switch from nutrient-rich to energy-dense, nutrient-poor foods is associated with income decline and rising poverty with negative impacts on nutritional outcomes.

As the economic and health consequences of the pandemic continue to unfold, it becomes clearer that women and children are especially vulnerable and increasingly likely to be affected by a deteriorating nutritional status. It is estimated that, by 2022, the pandemic might lead to a 9.3 million and a 2.6 million increase in wasted and stunted children, respectively, as well as 168,000 additional child-deaths and 2.1 million maternal anemia cases. Significant investments will be needed to minimize the effects of the pandemic.

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The state of micronutrient deficiencies in the world

Micronutrients such as iron, vitamin a, vitamin d, iodine, folate and zinc are fundamental to full physical and mental development, yet they are missing from the diets of many in the world: over 2 billion people globally suffer from micronutrient deficiencies. Micronutrient deficiency, also known as hidden hunger, is especially common amongst low-income populations and more prevalent in regions and countries with low dietary diversity. Hidden hunger affects people who suffer from overweight or obesity and people who are undernourished.

Amongst the populations most vulnerable to hidden hunger are women and children. At least 1 in 2 children globally lacks essential micronutrients in their diets, and as many as 528 million women, including both pregnant and non-pregnant women, suffer from iron deficiency alone.

Large-scale food fortification (LSFF), either through bio-fortification of crops or through the fortification of food products ready for human consumption, has proved to be a cost-effective tool to tackle micronutrient deficiencies. It is estimated that for every dollar spent on fortification there is a US\$27 return from outcomes of improved nutrition.

Salt iodization: the public health success of public-private partnerships

Iodine is a diet-derived mineral that contributes to the well-functioning of the body by creating thyroid hormones which are necessary throughout life and especially during pregnancy and infancy for full brain development. Preventable mental impairment, such as loss of learning ability and cretinism, as well as disorders such as stillbirth and miscarriages, can result from even low levels of iodine deficiency.

Salt iodization is a form of large-scale food fortification, whereby food-grade salt for human consumption is fortified with iodine. Thanks to public-private partnerships aimed at universal salt iodization, iodine deficiency has been greatly reduced: 86% of the world's households now have access to iodized salt, 129 countries worldwide have adopted mandatory salt iodization programs, and only 20 countries globally have insufficient iodine status, compared to 113 in the 1990s.

The successes of universal salt iodization programs has been one of the first signs indicating that food fortification can be an efficient and cost-effective tool to tackling malnutrition globally, and it would not have been possible without public-private partnerships involving the food industry: 'Universal salt iodization has been one of the great public health success stories of the last 25 years' – Werner Schultink, Executive Director, Iodine Global Network.

The impact of COVID-19 on micronutrient deficiencies

The impact of COVID-19 on access to micronutrients is at least threefold.

Firstly, as a result of the economic fallout caused by the pandemic, people worldwide have switched from nutrient-rich to energy-dense, nutrient-poor foods, thus reducing their dietary diversity and access to foods rich in micronutrients.

Secondly, by negatively affecting global food supply chains and international trade, which food fortification programs inevitably rely on, through export restrictions and rising costs of freight, COVID-19 has reduced the reach and scope of food fortification programs in low- and middle-income countries, as reported by the Global Alliance for Improved Nutrition (GAIN).

At the same time, lockdown restrictions have hindered nutrition services, including services providing micronutrient supplementation: as many as 100 million children have missed a dose of vitamin A supplementation in 2020 as a result of pandemic management measures.

Micronutrient deficiency

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The importance of a healthy start in the first 1,000 days

Optimal nutrition during the time between conception and the second birthday of a baby – the first 1,000 days – are fundamental to children’s development, in terms of their health, and physical and cognitive abilities. With breastmilk being a free, safe source of all necessary nutrients and antibodies, breastfeeding has long been understood to be the best and most effective way to nourish infants while also reducing their susceptibility to overweight and obesity.

The World Health Organization (WHO) and the United Nations Children’s Fund (UNICEF) recommend that infants be exclusively breastfed for the first six months of their lives, when appropriate complementary foods can be introduced, while breastfeeding continues for two years or beyond. However, the world is currently not on track to meet [Global Nutrition Target 5](#) which is to increase the global rate of exclusive breastfeeding in the first six months to 50% by 2025. In 2019, only two in five children globally were exclusively breastfed at this crucial phase of their lives. The 2019 Cost of Not Breastfeeding tool shows as many as 593,379 childhood deaths (0 to 23 months) from diarrhea and pneumonia are attributable to not breastfeeding according to the global WHO and UNICEF recommendations, and that optimal breastfeeding has the potential to prevent an additional 98,243 deaths of mothers annually from cancer and type II diabetes.

The WHO identifies inappropriate marketing of breast-milk substitutes (BMS) as one of many factors that negatively impacts breastfeeding rates worldwide. To limit the impact of BMS marketing, in 1981, the World Health Assembly (WHA) adopted the [International Code of Breast-milk Substitutes](#) (known as The Code), that makes a series of recommendations to member states and BMS manufacturers and distributors. Since that date, 18 further WHA resolutions have been passed that reinforce, revise or extend the provisions of the 1981 Code (collectively referred to as The Code). However, as of 2020, 30% of countries still have none of its provisions in their law and only 31 countries have legal measures that implement the full breadth of The Code’s recommendations.

ATNI’s research on the extent to which major manufacturers of BMS and complementary foods comply with The Code can be found [here](#).

The BMS/CF Marketing Index 2021

The [BMS/CF Marketing Index](#), published in June 2021, assessed the marketing practices of the world's nine largest BMS and CF manufacturers, six of which are also part of the Global Index 2021 (Danone, FrieslandCampina, KraftHeinz, Mengniu, Nestlé, and Yili).

The assessment examines the extent to which these companies market their BMS and CF products in line with The Code. The research entails two components: i) BMS/CF 1: an analysis of companies' BMS/CF marketing policies, management systems and disclosure and ii) BMS/CF 2: two in-country assessments of companies' marketing practices on the ground (the Philippines and Mexico in 2020). The total possible overall BMS/CF Marketing Index score is 100%. The higher the score, the closer the company has come to achieving full compliance with The Code. An adjustment proportionate to this score is then calculated to be applied to each of the six companies' Global Index score, reflecting the importance of corporate focus on infant and young child nutrition. The adjustment depends on which elements each company has been scored on. For Danone, FrieslandCampina, KraftHeinz, and Nestlé the maximum adjustment that can be made is -1.5, as in the 2018 Global Index. The maximum adjustment to the Global Index 2021 score for Mengniu and Yili is -0.75 as it was only possible to assess these two companies on BMS/CF 1.

Overall, the findings reveal that 40 years after the adoption of The Code, the world's largest baby food manufacturers continue to fall short of meeting its recommendations.

Impact of COVID-19 on breastfeeding

Initial uncertainty about the safety of breastfeeding during the COVID-19 pandemic led to concerns about whether mothers could transmit the virus to their infant through breastfeeding. In June 2020, however, the WHO issued a statement encouraging mothers to continue breastfeeding, even when suspected or confirmed with COVID-19 infection.

With experts warning about the consequences of the spread of misinformation, initial concerns and uncertainty are likely to have had a negative impact on breastfeeding rates. A study of 33 national guidelines for infant care by Alive & Thrive (A&T) found that none of the documents analyzed fully aligned with the WHO breastfeeding and COVID-19 guidelines. Similarly, a January 2021 study by (A&T) and FHI 360 of nine companies in 14 countries found instances of violations of The Code in the wake of the pandemic.

The long-term impacts of less breastfeeding during this time could be significant: estimates indicate that a mere five percent reduction in breastfeeding could lead to an additional 16,469 child deaths in low- and middle-income countries. It is therefore of the utmost importance to support breastfeeding and monitor compliance with The Code throughout the COVID-19 pandemic, and beyond.

Infant and Young Child Nutrition

The WHO identifies inappropriate marketing of breast-milk substitutes, also known as BMS products, as one of the factors negatively impacting rates of breastfeeding worldwide.

As of 2020, 30% of countries still have none of The Code's provisions in their law and only 31 countries have legal measures that implement the full breadth of The Code's recommendations.

A compelling case for the food and beverage industry

Malnutrition in all its forms is a leading cause of death worldwide: in 2017, 11 million deaths and 255 million disability-adjusted life years were attributable to dietary risk factors. Globally, 45 percent of deaths among children under the age of 5 are linked to undernutrition. Tackling malnutrition is thus a moral imperative, which is necessary to reduce diet-related illnesses and deaths.

Tackling malnutrition is also an economic imperative. Overweight and obesity, undernutrition and micronutrient deficiencies, indeed, represent a heavy burden to economic development globally: their material cost is estimated at 5% of global income or US\$3.5 trillion per year. The economic cost of malnutrition differs widely by country and by region. Whilst undernutrition is significant in world regions such as Africa and Asia, where it accounts for an 11% loss of GDP each year, overweight will lead to an annual 3.3% reduction in GDP in Organisation for Economic Co-operation and Development (OECD) countries and will constitute as much as 8% of national health expenditure.

The state of the packaged food industry

The largest global food and beverage manufacturers were facing a number of challenges even before the COVID-19 pandemic with mounting evidence of consumer demand increasingly shifting towards smaller challenger brands with a purpose-driven outlook, as well as towards cheaper private label brands – trends which are predicted to continue after the pandemic. Anticipating changes emerging from both consumer pressure and regulatory measures, CEOs of food and beverage companies worldwide had acknowledged the need for their industry to play a role in promoting healthier lifestyles even prior to the COVID-19 pandemic.

In the rapidly-evolving context of the pandemic, food and beverage manufacturers have been faced with new challenges, including the responsibility of feeding the world at a time of crisis. As an essential industry, the packaged food industry has benefitted from the pandemic, registering a year-on-year retail value growth of over 5% between 2019 and 2020. On the one hand, indeed, food companies – from small to large, from local to transnational – have been struggling with disruptions in distribution channels, transport restrictions and changing consumer demand.

The COVID-19 pandemic has exacerbated the cost of malnutrition, with estimates indicating that, by 2022, COVID-19 will have resulted in US\$29.7 billion worth of productivity losses derived from increased rates of childhood stunting, wasting and mortality.

What cannot be determined with exact precision, however, is the social cost of malnutrition. Poor diets negatively impact neurodevelopment, with dramatic consequences on children's academic performance, careers and earning prospects. General well-being, including mental health, is also hindered by malnutrition. Children who are overweight, for instance, are more likely to be bullied, which can result in adverse mental health outcomes.

On the other hand, in many instances, they have been able to adapt to this challenging environment and to innovate rapidly. As highlighted in recent IFPRI research, the pandemic has outlined both fragility and resilience in food supply chains. The ability of the food and beverage sector to innovate has resulted in significant changes in food environments. E-commerce in food retail, for instance, has witnessed a nearly 50% growth worldwide and has increased by over 100% in several middle-income countries.

The reach and market penetration of the packaged foods industry – with a retail value of nearly US\$2.5 trillion in 2020 – speaks for the magnitude of the impact the industry could have on nutrition globally: food and beverage manufacturers reach virtually every individual on the planet. Further, the rapid expansion of the industry in emerging markets in the Asia-Pacific, Latin America, and Middle East and Africa regions – which represent the main drivers of growth for the industry – presents the opportunity to reach populations who are vulnerable to malnutrition.

Risks and opportunities for global food and beverage manufacturers

There are several business risks linked to the production of products that contribute to poor diets: reputational risks, litigation risks, risks of losing out on emerging markets for healthier products, and regulatory risks. The latter have been increasingly brought under the spotlight by nutrition stakeholders in the past years. As the evidence about the drag of poor diets on national health spending increases, governments continue to regulate food environments. To date, for instance, 44 sugar taxes exist globally. In addition, several governments worldwide have implemented, or are considering implementing more stringent regulations with regards to matters such as front-of-pack food labelling and advertising of unhealthy food products. This represents a strong material risk for investors with holdings in global food and beverage manufacturers, insofar as companies with a product portfolio rich in foods that are high in fat, salt and sugar (also known as HFSS foods) could see decreasing sales and revenues.

The cost of malnutrition represents a burden not only for national governments worldwide, but also for the private sector more directly. A July 2020 report by Chatham House shows that multinational corporations, across different sectors, lose, annually, an estimated US\$8–38 billion from reduced worker productivity due to undernutrition, an estimated US\$4–27 billion due to overweight and obesity and an additional 0.8 percent of GDP due to anemia (in the countries where the condition was studied). Thus, tackling malnutrition in all its forms can be viewed as a tool to achieve business growth.

However, food and beverage manufacturers are becoming more engaged with the topic of nutrition as the number of private sector accountability mechanisms increases, as business risks linked to malnutrition become more evident, and as opportunities arising from promoting healthier diets become more visible.

COVID-19 enhances the business case for nutrition

The COVID-19 pandemic has brought the role of the food industry in tackling obesity and other diet-related diseases, which are risk factors for COVID-19 infection and mortality, under the spotlight and has highlighted the relevance of healthy diets for public health.

On the one hand, the pandemic has resulted in a greater level of awareness of nutrition, amongst both governmental bodies and consumers. Governments around the world are rolling out stricter regulations for less healthy foods as a preventive healthcare policy, particularly aimed at tackling obesity. At the same time, sales data shows that COVID-19 has accelerated rising demand for healthy food products by relatively affluent consumers. As highlighted in [ATNI's second COVID-19 report](#), the COVID-19 pandemic is accelerating the increase in the demand of healthier products: affluent consumers are becoming increasingly engaged with the topic of nutrition and wellbeing. Analysis from Euromonitor International shows that ethical concerns are becoming increasingly important to consumers, who expect businesses to perform well both on environmental and social issues such as health.

As a result of COVID-19, the health and wellness packaged food category witnessed an almost unprecedented single-digit value growth at the global level, which is forecast to last beyond the pandemic.

On the other hand, as outlined throughout this chapter, the COVID-19 pandemic is resulting in reduced access to healthy and nutritious foods for poorer populations and, in some cases, to increased demand for less healthy food products such as snacks and comfort foods.

At the intersection of the trend outlined above lies a unique opportunity, and responsibility, for food and beverage manufacturers to grow and innovate by putting the well-being of their consumers first – a process which the Global Access to Nutrition Index aims to facilitate.

Global Index 2021 Findings

Similar to the 2018 Index, the company leading the ranking in the 2021 Global Index is Nestlé, with an overall score of 6.7 out of 10. Unilever is in second place (6.3), followed by FrieslandCampina (5.9).

This Index expanded the scope of the Product Profile assessment, with nutrition information available for more products (38,176 products assessed in 2021 compared to 20,865 in 2018) across 25 different markets relevant for the companies (in 2018, only nine markets were included). This significantly improves the quality of the assessment and its representativeness of companies' sales in the global market.

Nine companies improved the healthiness of their product portfolios and increased the mean HSR in the markets selected. At overall portfolio level, 11,797 products, or 31% of 38,176 distinct products, meet the independent healthy threshold (an HSR of 3.5 stars or more). For all products assessed for all companies, the mean HSR is 2.4 stars. In 2018, the mean HSR for 20,865 products assessed was also 2.4 stars. Five companies were found to have 50% or more of products assessed meet the healthy threshold.

Highlights of improvement in nutrition policies and practices include:

- Thirteen companies have improved their score in nutrition governance, reflecting strengthened nutrition policies and management systems.
- Nine companies showed improved healthiness of their products at portfolio level.
- Fourteen companies apply some form of company-specific nutrient profiling model (NPM) to monitor the healthiness of their products, while 19 companies make commitments on the (re)formulation of products at nutrient level.
- Nine companies commit to follow international guidance by Codex and WHO/the Food and Agriculture Organization (FAO) to ensure food fortification delivers clear health benefits. In 2018, only four companies assessed did so.

The 2021 methodology gives more weight to the Products category, applies stricter evidence requirements, and has an increased focus on companies' commercial efforts to address malnutrition. With these changes, the average score across all the companies remains the same in this Index as in 2018: 3.3 out of 10. When only taking into consideration the 22 companies that were assessed in both 2018 and 2021, the average score is 3.6. This indicates that, overall, these companies are doing slightly better than in 2018. However, the 10 leading companies of the 2021 ranking, except for Arla, score slightly lower than in the 2018 iteration, while most companies in the middle and lower rankings score slightly higher. ATNI calls on all companies, especially the leading companies, to step up their efforts to improve healthy diets. All companies should seize this opportunity to make healthy products affordable to consumers globally and thus maintain competitiveness given consumers' changing needs and preferences.

- In 2018, no companies applied interpretive nutrition labeling front-of-pack (FOP), which provides consumers with a qualification of the (relative) nutrition quality of the product. However, by 2021, six companies had introduced it to some or all products globally.
- This index shows 12 companies disclose lobbying positions on important nutrition topics, whereas, in 2018, only two companies did so (notably FOP labeling and health claims regulation). Plus, more companies have made commitments and/or provided examples of supporting governments in their efforts to prevent and address malnutrition.
- Three of the six companies assessed in the BMS/CF Marketing Index 2021, also included in the Global Index, have increased their scores since 2018. Danone and Nestlé retained first and second place on that Index respectively, and Kraft Heinz came third, because it shared its BMS marketing policy for the first time and performed relatively well in ATNI's in-country assessment, carried out in Mexico.

The companies that improved the most in the overall ranking are Arla (rising six places) and Meiji (rising five places):

Arla's greatest improvement has been in labeling and marketing: Since 2018, it has adopted a new labeling policy, with commitments to display nutritional information on both FOP and back-of-pack (BOP), and the company has also introduced a government-endorsed interpretive labeling on some of its products. Arla's responsible marketing policy improved through tailored marketing of healthy products for groups experiencing, or at high risk of, malnutrition in low- and middle-income countries. Meiji's score changed from 0.8 to 3.1, mostly due to the Meiji Group Sustainability 2026 Vision – a new strategy that includes a focus on nutrition (including addressing undernutrition and micronutrient deficiencies among women and older people in Japan) – and the introduction of several new basic policies relating to responsible marketing, labeling, and employee health.

Category A: Governance

Nestlé and FrieslandCampina rank first and second in **Nutrition Governance**, which addresses nutrition strategies, management systems, and reporting. Thirteen of the 22 companies that were assessed in 2018 have since strengthened their nutrition policies and management systems. Kraft Heinz has shown the greatest improvement, increasing its score by 2.8 points after adopting global nutrition guidelines in 2020, and Grupo Bimbo moved up furthest (by seven places) in this Category.

Although Governance remains the highest-scoring category on the Index, there has been only a small increase in average score (4.5 to 4.6).

ATNI welcomes this overall (albeit slight) improvement on three years ago. Despite these efforts, however, considering the overall average score of 3.3, there are still many aspects of company performance that urgently require investment and improvement. **2021 is both the era of COVID-19 and the Nutrition for Growth Year of Action: There has never been a greater need and opportunity for food and drink manufacturers to step up the positive changes needed to ensure healthier diets for all.**

Selected Best Practices

- Among the companies assessed, Nestlé demonstrates the most comprehensive nutrition strategies, management systems, and reporting.
- FrieslandCampina has updated its 'Nutrition Policy', published a 'Better Products Program' with nutrition criteria, and the company's 'Broadening Access to Nutrition' policy aims to make foods and beneficial nutrients available to more people, especially those with lower incomes.



Category B: Products

Danone leads in **Formulating Appropriate Products**: The company ranks first in the Product Profile and has updated its NPM, which is used to guide reformulation and innovation initiatives. Arla, Kraft Heinz, Mars, and Grupo Bimbo have made significant progress in their scores and rankings because of their adoption of new company specific NPMs and/or new commitments on (re)formulation.

This Index expanded the scope of the Product Profile assessment, with nutrition information available for more products (38,176 products assessed in 2021, compared to 20,865 in 2018) across 25 different markets relevant for the companies (in 2018, only nine markets were included). This significantly improves the quality of the assessment and its representativeness of companies' sales in the global market.

Nine companies show an increased mean HSR of products in the markets selected. This is one of three scored components of the Product Profile. Nestlé showed the highest improvement (0.8 Health Stars change), followed by Ferrero (0.5 Health Stars change). Both companies received a maximum score for this component.

However, the mean HSR score, a second scored element of the Product Profile, for all companies and all products was 2.4, the same as in 2018. Only five companies had half or more of their distinct products included in this research meet the healthy threshold (achieving an HSR of 3.5 stars or more out of 5). Four of these companies are estimated to derive 50 percent or more of their retail sales from these healthy products, showing most other companies are falling short in providing nutritious options globally. Of the 38,176 products assessed across all companies, 11,797 (31%) meet the healthy threshold – the same percentage as in 2018.

Danone achieved the highest mean healthiness score (6.9 out of 10). An indication of the nutritional quality of the company's products in best-selling categories across major markets, it was the only company to achieve the healthy threshold of 3.5 HSR at portfolio-level when results were sales-weighted.

Danone and Mars received the highest score on the relative healthiness of their products within product categories, a third scored component of the Product Profile assessment. Mars is assessed across eight product categories in which it competes with one or more peers. The company ranks first in 'Confectionary' and 'Ready meals', and second in 'Rice, Pasta, and Noodles'. Danone achieves a top rank in the categories 'Bottled Water' and 'Dairy'.

Fourteen companies have adopted some form of NPM, compared to 13 in 2018. While ATNI learned of more companies planning to use independent NPMs or already using government-endorsed systems to validate their own/company-specific models, only three companies provided evidence that their definition of healthy products corresponds with the HSR healthy threshold.

Nine companies, four more than in 2018, indicate that their approach to the fortification of products, to help address undernutrition, is based on international guidance shared by FAO (Codex) and/or WHO (Guidelines on Food Fortification with Micronutrients). Just six commit to only fortify products of high underlying nutritional quality, or which meet certain nutrition criteria.

More than half of the companies have not made significant progress in this Category since the 2018 Index – particularly when it comes to the nutritional quality of products in their portfolios, adopting/improving NPMs, disclosing the number of products that meet healthy criteria, and developing healthy, appropriate products to address undernutrition and micronutrient deficiencies.

Selected Best Practices

- Ajinomoto and Kellogg adopted a full NPM. Grupo Bimbo has published new nutritional guidelines and an NPM which are validated by a government-endorsed system.
- Kellogg upgraded its model, which is now considered a full internal NPM (that calculates overall scores of ratings of the nutritional quality of its products). In addition, the company stands out in reporting by using an independent, government-endorsed NPM (Nutri-Score) as a tool to (re)formulate its products.
- As part of its newly released 'Future Foods' strategy, Unilever has made a commitment to double the number of products sold that deliver 'positive nutrition' by 2025. The company defines this as foods which "contain significant, impactful amounts of crucial ingredients and macronutrients, like vegetables or proteins, and/or micronutrients, like vitamins and minerals." The company is in the process of updating its NPM.
- Arla, FrieslandCampina, and Danone showed evidence that their definition of healthy products corresponds with the HSR ≥ 3.5 definition of healthy.
- Both FrieslandCampina and Nestlé have published commentaries on their investments to develop products specifically for priority populations experiencing, or at risk of, all forms of malnutrition (including overweight/obesity and diet-related noncommunicable diseases (NCD's)).

Compared to 2018, more companies define targets for at least one of the following nutrients – sodium, trans fat, saturated fat, and sugar/calories – but only Unilever defines a target on foods delivering ‘positive nutrition’ for all products globally.

Category C: Accessibility

When it comes to **Accessibility and Affordability** of healthy products, FrieslandCampina and Nestlé have the most comprehensive approaches to pricing and distribution, including for products designed to address micronutrient deficiencies. Overall, companies perform better on accessibility (i.e., geographical access and distribution of healthy products) than on affordability (i.e., healthy product pricing). However, the average score for this category remains the lowest of the Index at 1.9, a decrease from 2018 when it was 2.5. This is partly because of a more demanding methodology in terms of requiring recent evidence and public disclosure on commitments. ATNI has also applied a heavier focus to the way companies improve their accessibility of healthy products commercially. ATNI does take note of the actions companies take non-commercially, but these efforts (such as donations and other philanthropic programs) hold less weight in the end score.

Most low-scoring companies made broad, stand-alone commitments that were not part of a formal policy. At times, these companies demonstrated ad hoc actions in some (but not all) markets and/or for some of their products.

There was also little evidence of a strategic, global approach to the pricing and distribution of healthy products that address micronutrient deficiencies to populations experiencing, or at high risk of, malnutrition. Despite a clear need for action to improve the affordability and accessibility of healthy products, particularly as COVID-19 has further threatened access to nutritious foods and increased micronutrient deficiencies, companies’ practices show limited progress in this area.

Selected Best Practices

- In ensuring Accessibility and Affordability of products, FrieslandCampina was the only company with objective, measurable targets, linked to its ‘Broadening Access to Nutrition’ policy for improving the pricing and distribution of its healthy products. One of its objectives is to increase the share of affordable nutrition products in its lower-income markets (Nigeria, Pakistan, Ivory Coast, Indonesia, Vietnam, and the Philippines) to at least 15% of sold volume in 2025. Additionally, the company aims to increase the percentage of affordable nutrition products that complies with its own nutrition criteria, ‘Affordable Nutritional Standards’, in these markets to at least 50% in 2025.

Category D: Marketing

FrieslandCampina again ranks first on **Responsible Marketing** (a score of 7.9 compared to an average of 3.5), consistently scoring high in general marketing policies, policies for children specifically, and auditing and compliance. In addition, it is one of the few companies to explicitly commit to developing and delivering marketing strategies to reach low-income groups at risk of undernutrition and micronutrient deficiencies with healthy and/or fortified products. Mars and Nestlé came second and third, respectively. The largest improvement (moving up five places) was made by Arla, which saw major improvements in its auditing of, and compliance with, marketing policies; including joining the EU pledge on advertising to children and initiating internal auditing of policies for all audiences to complement the auditing required by the EU pledge.

In general, companies score highest on the criterion assessing the quality of marketing policies for children. Most companies (20) have a specific marketing policy for this age group. However, many aspects of these policies could be improved in areas such as age ranges, and to cover all settings where children gather, along with digital spaces.

The lowest score is found in general aspects of responsible marketing, with a clear need for action to address in-store/point of sales and sponsorship marketing. Another issue, which has become even more evident and urgent as COVID-19 widens health inequalities globally, is for companies to commit to developing and delivering marketing strategies for healthy products that prioritize vulnerable populations.

An unscored element of the Index's research assesses whether products are suitable to be marketed to children, according to WHO criteria. In total, only 3493 out of 38,852 assessed products were deemed suitable to be marketed to children based on the criteria of relevant WHO regional NPMs. This equates to nine percent of distinct products assessed, which together also represent nine percent of the sales value of packaged foods of all companies combined. In 2018, ATNI found that 14% of 22,137 products assessed met the criteria of the WHO Regional Office for Europe Nutrient Profile Model.

Selected Best Practices

- FrieslandCampina was the only company to make explicit commitments on marketing strategies that reach priority populations and provide evidence of steps taken to reach these populations with products which address their specific nutrition needs through tailored marketing, on a global scale.
- Mars, Nestlé, and Unilever demonstrate leadership in their general marketing policies for all audiences. All three have publicly available responsible marketing policies that are fully aligned with the principles of the International Chamber of Commerce (ICC) general marketing code and make commitments beyond the ICC Code. They each apply their policy to all media channels covered by the ATNI methodology and implement it globally.
- Arla remains the only company specifically to use a definition of 'child' as being those aged under 18 (as defined in the UN Convention on the Rights of the Child), and to set out which aspects of its responsible marketing policy applies to under-18s and which to under-12s.

Category E: Lifestyles

Global food and beverage manufacturers have a significant impact on the **Lifestyles** of their employees and consumers. Overall, most companies (20) have a commitment to the health and wellness of their employees and implement programs designed to improve physical health and/or nutrition – with Unilever leading the field.

However, despite the need for action to support employee health and wellbeing – a factor that has been particularly evident during the COVID-19 pandemic – companies' efforts in this category achieved an average score of just 2.7. Only eight companies state their intention to address health and wellbeing in their wider value chain, which has been shown to be vitally important for supply-chain resilience during crises such as COVID-19. Most companies still do not provide support consistently across all their markets for breastfeeding mothers in the workplace. And, while most companies have programs on nutrition education that are healthy diet and active lifestyle orientated, these would be better designed, and more effective and appropriate, were they clearly evidence-based, aligned with relevant national or international guidelines, and (co-)implemented by independent third parties with relevant expertise.

Category F: Labeling

Unilever leads in the Category of **Product Labeling and Health and Nutrition Claims**, improving its score and rising three places in the ranking thanks to its front-of-pack (FOP) and back-of-pack (BOP) labeling commitments, transparency, and adherence to international guidelines. An important step forward in this Category is that, in 2018, none of the companies had introduced interpretive labeling (e.g., using color-coding, a traffic light system, or a star or similar rating system instead of only quantitative information) – but, by 2021, six companies had done so for some or all their products. Since 2018, there has also been an increase in the products and markets to which companies apply their BOP labeling commitments. However, the number of companies disclosing their overall BOP and FOP labeling commitments has not improved.

Overall, the average score of this Category (3.6) has remained low. Less than a third of all companies assessed in this 2021 Global Index adhere to (inter)national guidelines regarding the use of labeling claims. There is additional room for improvement regarding transparency, with some companies scoring very poorly overall on the disclosure element of product labeling.

Selected Best Practices

- Unilever's 'Lamplighter Program' combines health risk appraisals with physical activity opportunities, good nutrition, and mental resilience to improve employee health and wellbeing.
- Nestlé's new Global Parental Support Policy foster a gender-neutral approach to childcare, promoting paid leave, non-discrimination, and flexible working, and requiring breastfeeding rooms in all company locations with at least 50 employees.

Selected Best Practices

- Nestlé has a public commitment to use interpretive labeling on its products, globally. It is the only company that commits to not use nutrition and health claims in countries where local or national regulations are less strict than the Codex Alimentarius Guidelines, and it also uses an NPM to inform the use of claims. Meanwhile, Danone has extensive public commitments regarding the use of both FOP and BOP labeling on its products.
- Danone is also the only company that commits to display nutrition information online which specifically takes into account differences in product composition (which often varies between markets) for over 90% of its products globally; in turn providing consumers with accurate, country-specific nutritional information about its products.

Category G: Engagement

When it comes to **Engaging with Governments and Policymakers**, it is encouraging that 10 more companies than in 2018 are now disclosing lobbying positions on relevant nutrition topics, notably FOP labeling and health claims regulation. Meanwhile, almost all companies were found to have anti-corruption measures and whistleblowing mechanisms in place, and 15 companies either assign Board oversight of their lobbying positions or carry out internal audits of their lobbying activities. More companies are also making commitments and/or providing examples of supporting government efforts to prevent and address malnutrition, including obesity.

However, with an average score of just 2.9 across all the companies, there is still considerable room for improvement – particularly on disclosure of trade association membership, paid lobbyist activity, and governance conflicts of interest. Just two companies publicly commit to lobbying in support of measures to improve health and nutrition. A key concern is that only three companies were found to publish a commentary on lobbying measures to prevent and address all forms of malnutrition, and most companies focus primarily on supporting governments in their home market. There is significant scope for companies to invest in more comprehensive and structured engagement with domestic and international nutrition stakeholders, in order to inform, develop, and improve their nutrition strategies, policies, and programs.

Selected Best Practices

- Danone and PepsiCo are the only companies with a public commitment to engage with governments and policymakers with the intention to only support measures that prevent and address malnutrition. PepsiCo was found to be the most transparent in disclosing its lobbying positions across several topics, including responsible marketing and advertising legislation.
- Kellogg states that it actively engages in ongoing conversations with multilateral organizations, governments, and NGOs, to identify risks and opportunities and inform its strategies, new programs, and food innovations. It has also engaged with governments to address hunger and malnutrition among children from low-income households.

Marketing of breast-milk substitutes (BMS) and complementary foods (CF)

Manufacturers of BMS and CF have a significant impact on infant and young child (IYC) nutrition globally; influencing optimal breastfeeding and complementary feeding practices which not only have direct impacts on IYC health but, ultimately, affect the health of future generations. The International Code of Marketing of Breast-milk Substitutes and all subsequent relevant World Health Assembly (WHA) resolutions, including WHA 69.9 (collectively referred to as 'The Code'), urges and guides BMS and CF manufacturers to market their products responsibly to protect and promote exclusive breastfeeding in the first six months, and continued breastfeeding up to two years of age and beyond. ATNI expanded the coverage of the BMS Index in 2021 to include the nine largest companies in the global baby food segment: Abbott, Danone, Feihe, FrieslandCampina, Kraft Heinz, Mengniu, Nestlé, Reckitt, and Yili.

Danone – the company with the second highest sales in the baby food segment in 2019 at \$8.5 billion – once again leads the BMS/CF Marketing Index 2021, with a score of 68%. This result is a substantial improvement from its 2018 score of 46%. Nestlé – the market leader with sales of just over \$15 billion in this segment in 2019 – comes second, with a score of 57%, also a substantial improvement on its 2018 score of 45%. These two companies' performances increased principally due to the relatively high levels of compliance ATNI found with The Code, and local regulations that go beyond this in the Philippines and Mexico; compared to lower levels of compliance found in similar studies that ATNI carried out in Nigeria and Thailand for the 2018 assessment (BMS/CF 2). However, their scores fell on the BMS/CF 1 element of the Index, which assesses the alignment of their policies, management systems, and disclosure with the International Code on the Marketing of Breast-milk Substitutes and all subsequent, relevant WHA resolutions up to and including WHA 69.9 in 2016. This is because neither company has revised its marketing policy since the 2018 Index, and the fact they were assessed for the first time on their compliance with WHO guidance related to WHA 69.9 on ending inappropriate marketing of foods for infants and young children.

Kraft Heinz increased its ranking to third in the BMS/CF Marketing Index 2021, with a score of 38%, up from zero percent in 2018. This improvement was driven by having shared with ATNI for the first time a BMS marketing policy, as well as achieving a better result in the Mexico study compared to the study carried out in Nigeria in 2017. This company is substantially different to the others assessed in the BMS/CF Marketing Index, as it is the smallest (with global sales in 2019 of \$512 million) and because it generated most of those sales from CF, whereas the majority of the other companies generated most of their sales from formulas.

While some of the companies' policies align to the 1981 Code recommendations and associated WHA resolutions to some extent, most make significant exclusions in relation to certain products and markets. None apply in full, globally. Moreover, none of the six companies whose policies could be assessed for this Index have yet extended them to incorporate the 2016 WHO guidance.

The companies assessed in both the Global Index and the BMS/CF Index are Danone, FrieslandCampina, Kraft Heinz, Mengniu, Nestlé, and Yili, and their scores in the Global Index are adjusted based on their scores in the BMS/CF Index. The methodology for the BMS/CF Marketing Index 2021 is available [here](#), and the Index report is available [here](#).

Selected Best Practices



FrieslandCampina's programme, 'Broadening access to nutrition', aims to make foods and beneficial nutrients available to more people, especially those with lower incomes. Seanuts II and ANI research projects provide the company with information for products and fortifications needed to help combat undernutrition and micronutrient deficiencies in children up to 12 years old and women of reproductive age in markets in Asia and Africa. The studies' results are published in the public domain.

A



Danone disclosed its benchmark on alignment of its definition of healthy categories with HSR. Danone's 'healthy categories' are benchmarked against the HSR and the information is publicly disclosed. The percentage of healthy products in Danone's portfolio is 90% according to the company's own criteria, and accounts for 88.3% of sales (water represents about two-thirds of Danone's total sales in volume) when utilizing the HSR healthy threshold (HSR ≥ 3.5). In the Product Profile, a total of 1,626 products across 10 markets were assessed for Danone, and 997 (61 percent) met the 'healthy' threshold. The company uses volume data excluding plant-based products, whilst the Product Profile utilized retail sales including the plant-based segment- one of the reasons the company's figures differ from those of the Product Profile.

B



Nestlé has developed and updated its commercial strategy, known as Popularly Positioned Products (PPP), to address the affordability of products meeting its own nutrition criteria, including those aimed at addressing micronutrient deficiencies across all its market operations. To appropriately price healthy products whilst considering the needs of low-income consumers, the company has an Integrated Commercial Planning process in place. This aims to review pricing of Nestlé's healthy products falling within the scope of its Popularly Positioned Products strategy, globally. The company also demonstrated examples of its application in various markets. In terms of distribution, the company shares evidence from Bangladesh through which it reaches "deep rural marginal outlets" to ensure the availability and accessibility of healthy Nestlé products to rural consumers. Its focus on priority populations is substantiated with examples of various products designed to address micronutrient deficiencies (e.g., the Bear Brand in South-East Asia).

C



Arla is the only company to specifically refer to children as persons under the age of 18 years, as defined by the Convention on the Rights of the Child (CRC). In its policy, the company includes all children under the age of 18 and specifies which part of the policy applies to all children below 18 years and which part to children below 12 years. No other company extends the age range of its policy so high as under the age of 18.

The company stands out because of its broad commitment and public disclosure on the appropriate use of claims. The 'Arla Foods' labelling policy' aims to "create a uniform approach to packaging labelling with regards to the use of illustrations and information, including nutrition and health information, on all Arla Foods amba branded products, globally, to ensure simple and accurate product information to enable consumers to make informed dietary choices."

Arla has company specific nutrition criteria and states that they only allow the use of nutrition and health claims on products that meet these. The company commits to use national systems or guidance to get approval for nutrition and health claims and, if none exist, will only use claims in line with the Codex standards.



Unilever's award-winning Lamplighter Program is an innovative approach to employee wellness, using health risk appraisals alongside exercise, nutrition, and mental resilience to improve employees' health and wellbeing. Aggregated review results show that the Lamplighter programs offer a high return on investment, indicating that good health really is good for business. Unilever states this program is key to addressing the top three health risks across their business: mental wellbeing; lifestyle factors (such as exercise, nutrition, smoking, obesity); and ergonomic factors (such as repetitive strain injury).

Unfortunately, during the COVID-19 pandemic, Unilever has had to run the Lamplighter program at reduced capacity. In 2020, 42 countries ran the Lamplighter employee health program, reaching around 32,000 employees, and the "Employee Assistance Program" also supported employees through the pandemic.

Unilever is one of eight companies that demonstrated a commitment to improving the health and wellness of groups across the wider food supply chain. These groups are not direct employees (such as smallholder farmers, factory workers, and small scale vendors). The company's partnership in the 'Seeds of Prosperity', with GAIN and the Sustainable Trade Initiative (IDH), is helping tea workers and their families improve their health and wellbeing through more nutritious, diverse diets. The findings of this program will be utilized by all three groups to develop the next generation of workplace nutrition programs, with the aim of developing an approach which can be adapted to suit different businesses and contexts.

ATNI strongly encourages other food and beverage manufacturers to step up their efforts in this field.



In their latest 'Wellbeing Milestones' report, Kellogg describes in detail its engagement with numerous governments in the US, Latin America, and Europe to address hunger and malnutrition among children from low-income households. Kellogg also states that it actively engages in ongoing conversations with multilateral organizations, governments, and NGOs to identify risks and opportunities, inform new programs and food innovations, and further inform its Wellbeing Strategy, commercial strategy, and corporate policies on undernutrition.



Recommendations

Category A: Governance

Companies that scored highly on governance tended to score better across other Categories, too – suggesting that nutrition activities are likely to be better sustained where commitment starts at the top, and are integrated into core business strategy and publicly and comprehensively reported on.

Therefore, ATNI recommends that global F&B manufacturers continue to integrate nutrition considerations into core business functions, including linking executive pay to performance on nutrition objectives. These commitments could then be translated into specific action, and research conducted into how best to use commercial opportunities to address specific needs of priority populations.

Category B: Products

Companies can and must do much more to develop and deliver a comprehensive strategy to improve the overall nutritional quality of their portfolios and within product categories. Product innovation, reformulation, diverging from unhealthy product lines, and/or acquiring healthier brand lines will improve company scores on all three components of the Product Profile assessment (portfolio healthiness, within category healthiness, and change in healthiness over time).

ATNI recommends that global F&B manufacturers disclose nutrient information (including micronutrients) for all products, to enable more robust independent assessments of the nutritional quality of products (such as ATNI's Product Profile). Companies must improve transparency on the proportion of sales from healthy products and ensure their targets on portfolio level healthiness (e.g., through divestment/ acquisition) and product (re)formulation are aligned with national and international standards.

ATNI also recommends that companies commit to only fortify products that are healthy and inherently of high quality in addressing undernutrition, and that strategies and R&D investments are strengthened to develop products addressing micronutrient deficiencies.

Category C: Accessibility

ATNI recommends that global F&B manufacturers adopt a clear policy on affordability and accessibility of healthy products, including strong, unifying public commitments and SMART (specific, measurable, achievable, realistic, and timely) targets to guide their actions.

Most companies need to strengthen their current commitments by specifically addressing the needs of low-income consumers and/or those that lack physical access to nutritious food, across all markets. ATNI recommends regular in-country analysis to identify and target consumers who are affected by socioeconomic inequities and COVID-19-related disparities. Action to ensure the accessibility of healthy food to these groups should be accompanied by an explanation of how the healthiness of products is based on objective nutrition criteria that align with international standards.

Category D: Marketing

ATNI recommends that global food and beverage manufacturers invest in improving marketing policies that accelerate efforts to drive sales of healthy options. Commitments should align with the ICC marketing framework, widen the media channels to which policies apply, and explicitly address in-store/point-of-sale and sponsorship marketing in policies.

Developing and delivering marketing strategies appropriate to priority populations is also key to overcoming the inequities that have been exacerbated by COVID-19. ATNI recommends all companies adopt and apply WHO regional standards on marketing to children, increase the age covered by restrictions to under-18, and lower the audience threshold used to restrict advertising on all media to 25% or less. Marketing restrictions in primary schools could be extended to include secondary schools, other places where children gather, and areas surrounding these places.

ATNI also recommends that companies commission independent, annual marketing audits of their responsible marketing policies.

Category E: Lifestyles

COVID-19 has shown that safeguarding the health and resilience of those working in the food supply chain is key to food security in times of crisis. Hence, ATNI recommends that companies urgently improve and extend their health and wellness programs, including both nutrition and physical-activity elements and setting meaningful and quantifiable outcomes. These programs should be accessible to all employees and their families globally, and with an additional commitment to improving the health and wellness of groups across the wider food value chain that are not direct employees.

ATNI recommends companies that have not yet done so develop robust and publicly-available parental policies that apply equally in market operations worldwide, including support for breastfeeding at work and providing parental support/paid maternity leave (ideally for at least six months).

Additionally, ATNI recommends that consumer education and healthy eating and active lifestyle initiatives are evidence-based, aligned with relevant national or international guidelines, and (co-)initiated and developed by independent organizations with relevant expertise. Companies could take renewed steps to support programs that address the specific needs of those at high risk of micronutrient deficiencies, particularly in the wake of the COVID-19 crisis.

Category F: Labeling

To compensate for differences in local regulations around the world, ATNI recommends that global food and beverage manufacturers commit to providing comprehensive nutrition information on all product labels, in all countries. This includes strengthening commitments to display BOP nutritional information, including nutrients such as added sugars, fiber, and micronutrient content, and to provide interpretative FOP labeling.

ATNI also recommends companies commit to only using health and nutrition claims on products (including fortified foods) that are determined as being healthy by a relevant nutrient profiling system (NPS).

Category G: Engagement

The COVID-19 crisis has made clear the need for companies to take an active and constructive role in supporting government efforts to combat all forms of malnutrition, not only in their home countries, but in all markets in which they are active. ATNI recommends that global F&B manufacturers publicly commit to lobby responsibly, in-line with the Responsible Lobbying Framework, explicitly support only evidence-based measures that are designed to improve health and nutrition, and comprehensively disclose the extent of lobbying carried out.

ATNI also recommends that companies engage with a wide range of national and international stakeholders with specific expertise in nutrition-related topics during the design of their nutrition strategies, programs, and interventions, to maximize positive impact on public health.

Marketing of breast-milk substitutes (BMS) and complementary foods (CF)

Forty years after the original International Code of Marketing of Breast-milk Substitutes (The Code) was adopted, the 2021 BMS marketing assessment provides clear evidence that the marketing practices of the world's nine largest manufacturers of formula and foods for IYC are far from aligned with its recommendations.

ATNI encourages all of the nine major companies that make BMS and/or CF, which were assessed in the BMS/CF Marketing Index 2021, to adopt marketing policies that are fully aligned to the wording and scope of the 1981 Code, including all subsequent and relevant WHA resolutions.

ATNI recommends these marketing policies are applied to all product types. None of the six companies that have a BMS marketing policy extend this to all types of formula (i.e., none include growing-up milks for older infants from one to three years of age). Moreover, companies that make and market CF for children aged six months to three years of age need to incorporate the WHO guidance recommendations, issued in 2016 and associated with WHA 69.9. These are in relation to adhering to established standards and guidelines on CF product formulation, ensuring the appropriate use of marketing messages to support optimal feeding, avoidance of cross-promotions, and of conflicts of interest within the healthcare setting. It is critical that companies commit to uphold their policies in all markets (i.e., in both higher- and lower-risk countries) and apply them where there are no relevant regulations or where regulations do not fully implement The Code.

As for the companies that sell BMS products but do not yet have BMS marketing policies, ATNI encourages them also to publish such policies in which they commit to not only uphold relevant national regulations, but also implement The Code, in full, across all markets in which they operate currently or aspire to enter.

All companies are recommended to adopt effective, company-wide governance and management arrangements to ensure their policies are effectively and consistently implemented in all markets in which they operate, and to publish more information on their BMS and/or CF marketing policies and practices to provide greater transparency to all interest groups.

Future Opportunities

ATNI embraces the evolution of the methodology in this iteration of the Global Index, including the incorporation of the assessment of the healthiness of companies' product portfolios and the incorporation of policies and actions targeting priority populations at high risk of malnutrition, in both low- and high-income markets.

The COVID-19 crisis and its negative impact on malnutrition in the world has made it very clear, however, that more efforts at a faster pace are needed by the food industry to achieve the end of malnutrition in all its forms in 2030.

ATNI will share and reflect on the outcomes of this Index with the companies assessed, and with ATNI's investor signatories that engage with the companies, to discuss required follow-up action. The Index results will also be discussed with a wider group of interested parties in nutrition and food systems during various on-line events, to determine ways in which the industry response to malnutrition can and should be strengthened to ensure healthier diets

for all.

Moreover, ATNI is engaged in various working groups that are preparing for the United Nations Food Systems Summit (September) and for the Nutrition for Growth Summit (December). ATNI will disseminate the latest Index findings in these forums and share its experience on holding companies to account for their impact on nutrition. These events also provide all baby food companies with the ideal opportunity to make the commitments necessary to honor The Code.

The insights from the Index 2021 and the learnings from our 2020 COVID-19 project, in which F&B companies' responses to the pandemic in relation to nutrition were monitored, will be used to identify areas in our Index methodologies and other accountability tools that require further development to amplify ATNI's efforts to address malnutrition.

Category findings

The Corporate Profile assesses companies' nutrition-related commitments and policies, practices and disclosure across seven categories. A product profiling exercise, assessing the healthiness of companies' product portfolios using the Health Star Rating model is also part of the Corporate Profile.



Governance

Corporate strategy, management, and governance

The Global Index 2021 assesses companies' nutrition-related commitments, practices and disclosures. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable, accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories. This chapter presents the results of Category A, which carries 12.5 percent of the weight of the overall score of the Corporate Profile methodology.

For a food and beverage company to improve all aspects of the business that affect access to nutrition, commitments towards better nutrition should be well embedded in its commercial strategy. This ensures the prioritization of improved nutrition outcomes from the outset: from planning through to implementation and evaluation. It is equally important that companies also support or join governments' initiatives to prevent and address obesity and/or undernutrition, not only to ensure alignment with public health priorities as identified by the relevant authorities, but because the private sector can and should make a significant contribution to public health targets.

Category A assesses the extent to which a company's corporate strategy includes a specific commitment to contribute to healthier diets, and whether its approach is embedded within its governance and management systems. The quality of its reporting is also analyzed.

Category A consists of three criteria:

- A1 Corporate nutrition strategy
- A2 Nutrition governance and management systems
- A3 Quality of reporting

To perform well in this category, a company should:

- Have a mission and commercial strategy focused on health and nutrition and are factored into all major business decisions and functions.
- Address the nutritional needs of people experiencing, or at high risk of, any form of malnutrition (priority populations) in line with national nutrition priorities.
- Take action to address the triple burden of malnutrition through its commercial strategy, with a focus on priority populations.
- Assign accountability for implementing its nutrition strategy and/or programs to the CEO, and undertake regular internal audits and management reviews.
- Implement a certified food safety management system and track and prevent food loss and waste across all operations and business units.
- Comprehensively and publicly report on its approach to preventing and tackling all forms of malnutrition in all the markets in which it operates.

Ranking on Governance

A1 Nutrition strategy **A2** Nutrition management **A3** Reporting quality

* Did not provide information to ATNI

Nestlé and FrieslandCampina rank first and second in Category A respectively, with the most comprehensive nutrition strategies, management systems, and reporting among the companies assessed. Since the Global Index 2018, where 22 of the current 25 companies were assessed, Kraft Heinz shows the most significant improvement after adopting global nutrition guidelines in 2020, and increased their score from 0.5 to 3.4. In terms of ranking, Grupo Bimbo shows the biggest improvement in this category, going up seven positions to rank in 5th place and moving from a score of 4.9 (2018) to a score of 6.4 (2021). This is partly due to the way the company includes nutrition challenges in its risk assessments and acquisition decisions, and because Grupo Bimbo's nutrition strategy is supported by its board and regularly audited.

Category Context

The Global Index 2021 assesses whether companies commit to improving the healthiness of products for the general population, and to addressing the needs of groups experiencing, or at higher risk of, malnutrition than the general population. These groups are referred to in this report as 'priority populations'. Public authorities' definition of these risks and the groups affected should guide company commitments in the markets they are present in, and as relevant to their product portfolios and activities.

To assess the extent to which companies' corporate strategies include specific commitments to improving nutrition, ATNI considers that companies should recognize the targets set out in the WHO Global Action Plan (GAP) for the Prevention and Control of Noncommunicable Diseases NCDs 2013-2020. Likewise, they are expected to commit to delivering on the most nutrition-specific Sustainable Development Goals (notably SDGs 2, 3 and 12).

The main focus of this WHO Global Action Plan was on four types of NCDs — cardiovascular diseases, cancer, chronic respiratory diseases, and diabetes — that make the largest contribution to morbidity and mortality due to NCDs, and on four shared behavioral risk factors — tobacco use, unhealthy diet, physical inactivity, and harmful use of alcohol. In 2019, the GAP timeframe was extended to 2030 to prevent and control NCDs and also address mental health and environmental pollution (5×5 agenda, adding air pollution as fifth risk factor).

Box 1. How are nutrition strategy, management systems and reporting relevant to the COVID-19 crisis?

- **In light of the COVID-19 crisis, changes in health and mobility have led to a shift in eating habits, which has increased consumer engagement on the benefits of good nutrition for individual health and a move towards home-cooked meals.**
- ATNI's COVID-19 research findings reinforce the need for companies to prioritize nutrition in their strategies and programs — to ensure that appropriate accountability mechanisms are in place and provide sufficient public disclosure regarding their interventions. Together, this guarantees that nutrition-related considerations are sufficiently factored into their efforts to address the COVID-19 crisis, and the positive impact of their interventions are maximized.
- ATNI reported that an explicitly nutrition-sensitive strategic and company-wide response to this crisis was not evident. With the pandemic amplifying the need for healthier diets and better nutrition, companies would benefit from factoring nutrition issues into their acquisitions, disposals, joint ventures, or partnership decisions.
- ATNI also found that donations were a common response to the COVID-19 crisis. However, it is usually unclear whether in-kind donations are of healthy, nutritious products, and the impact of such donations on the recipient communities is also often uncertain, with limited public reporting from companies. ATNI welcomes any form of intervention that can help ameliorate the impact of the COVID-19 crisis on people's access to nutrition — but companies can have a much greater and more sustained impact by responding to this crisis via their commercial approach. This can be achieved by delivering more healthy foods that are more affordable and accessible, and by aligning their nutrition strategies both with recommendations set out by international authorities (such as the WHO or the FAO) and with plans established by national authorities in the markets in which they operate.

Relevant changes in methodology

In the Global Index 2018, company actions to prevent and address undernutrition among at-risk populations in low-income countries were assessed through a specific set of 'Undernutrition' indicators. These were not applied to companies that derived less than five percent of their F&B revenues from non-OECD markets. In the Global Index 2021 methodology, companies' commitment to specifically address the needs and key nutritional priorities of specific population groups at risk of malnutrition is assessed for low-, middle- and high-income countries alike. As a result, the Global Index 2021 shows if and how a company addresses all forms of malnutrition based on their market presence and the specific nutrition issues in those markets.

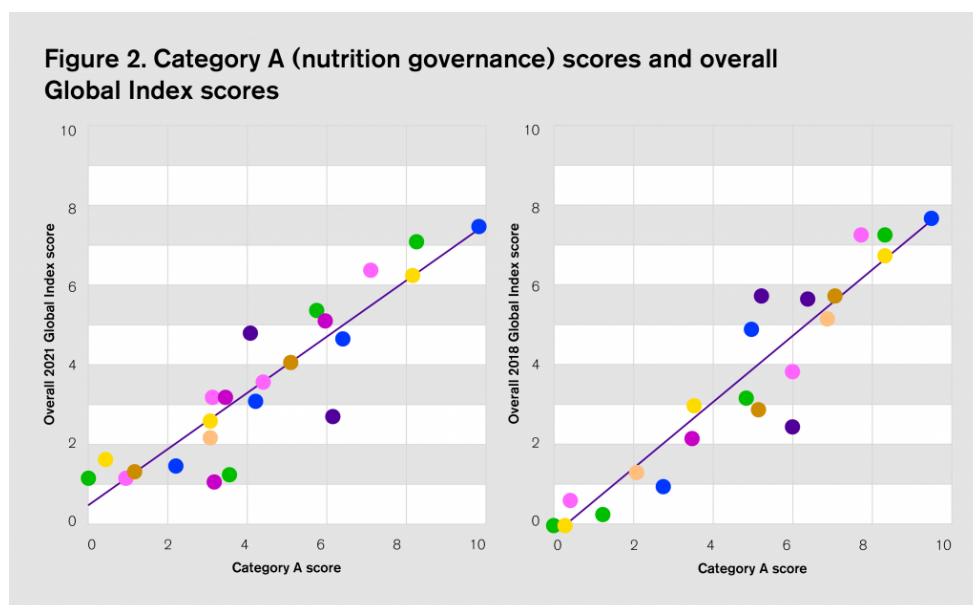
The underlying structure of the methodology for the Global Index 2021 has not been changed, but several refinements have been made since the previous iterations of the Global Index to streamline it. These include:

- The number of indicators in Category A has reduced (from 43 to 24), e.g. the removal of non-scored indicators;
- Selected companies' approaches to undernutrition were previously assessed through a separate section, in this report, the topic is integrated throughout the methodology and for all companies assessed;
- The concept of priority populations has been developed to assess companies' efforts to address different forms of malnutrition throughout the methodology;
- ATNI has included indicators on food loss and waste (FLW) to strengthen the linkage to the SDGs.

More details about the changes in the methodology can be found in the [methodology section](#) of this Index.

Key Findings

- The average company score on nutrition management and governance (Category A) is 4.6; a slight increase from 4.5 in 2018. Nestlé has a leading position with an average score of 9.7 points. (Note that some changes have been made to ATNI's methodology since the 2018 iteration – see above.)
- Kraft Heinz showed the largest improvement increasing its score by 2.9 points. The company (which was assessed for the first time as one company in the 2018 Global Index, after the merger of Kraft and Heinz in 2015) published Global Nutrition Guidelines in September 2020, along with a 2020 Environmental Social Governance Report that describes a new, strengthened nutrition strategy.
- Category A remains the highest-scoring category on the Index. Thirteen of the 22 companies assessed in the Global Index 2018 show an improved result, which reflects strengthened nutrition policies and management systems. But 12 out of 25 companies (including three companies new to the Index) show a decline or barely any indication of focusing on better nutrition in their strategies and management.
- A particularly important finding is that Category A scores align strongly with overall Global Index scores. This suggests that a company can better sustain and scale up its nutrition activities if commitment starts at the top and is integrated into its core business strategy (see Figure 2 below).
- The Global Index 2021 like the 2018 iteration shows that companies with high overall Category A (nutrition governance) scores tend to have comparably high overall Global Index scores (see Figure 2). These results reflect the association between robust nutrition governance and management systems, more comprehensive commitments and better performance on topics such as responsible marketing, labeling, product formulation, and consumer education.



General Recommendations

For stronger and more accelerated efforts to improve consumers' nutrition, leading food and beverage manufacturers are encouraged to:

- Continue integrating nutrition considerations in their core business functions.
- Further translate commitments into specific actions.
- Conduct research into commercial opportunities available to them in addressing specific needs of priority populations, including products targeting micronutrient deficiencies.
- To improve and accelerate efforts towards robust nutrition governance and management systems, global food and beverage manufacturers are encouraged to link executive compensation to performance on nutrition objectives, and ensure that nutrition plans and strategies are assessed regularly.

To improve transparency about how they are improving consumers' access to nutrition, companies are encouraged to:

- Publicly and comprehensively report on their approach to tackling all forms of malnutrition globally and on an annual basis, within the standard corporate reporting cycle.
- Conduct external verification of nutrition data and commentary to improve accountability.

Noteworthy changes and best practice



In its Wellbeing Milestones document, published in 2020, Kellogg sets out its approach to address malnutrition and the needs of priority populations (especially women of childbearing age and children in LMICs). The company places a strong emphasis on addressing micronutrient deficiencies via its commercial strategy through targeted reformulation and fortification. An improvement from 2018, the company provided evidence of conducting global, regional, local, and segment-specific assessments of market needs, including using data from public health authorities.

A



Meiji has a significant focus on addressing low levels of protein consumption in Japan, especially among the elderly and women, which is an issue identified in surveys by the Japanese Ministry of Health and Welfare. In 2020 the company launched the Meiji TANPACT product range, which includes beverages, jellies, yogurts, cheese, chocolate, ice cream, frozen foods, soups, and home delivery beverages with added protein and vitamins.

A



FrieslandCampina's programme, 'Broadening access to nutrition', aims to make foods and beneficial nutrients available to more people, especially those with lower incomes. Seanuts II and ANI research projects provide the company with information for products and fortifications needed to help combat undernutrition and micronutrient deficiencies in children up to 12 years old and women of reproductive age in markets in Asia and Africa. The studies' results are published in the public domain.

A



Coca-Cola established Sustainable Agriculture Guiding Principles(SAGP). In its 2019 Business & Sustainability report, the company states: "We ask our suppliers to demonstrate they are meeting the SAGP criteria by using global sustainable agriculture standards and assurance schemes. The Farm Sustainability Assessment of the Sustainable Agriculture Initiative Platform, the Bonsucro sustainable sugarcane standard and Rainforest Alliance certifications are some of the leading standards we support." The Principles include harvest and post-harvest handling, such as using correct harvesting techniques to reduce physical damage and loss.

A



A

The company's annual Creating Shared Value report is prepared in accordance with Global Reporting Initiative (GRI) standards, and the company discloses its mapping of material GRI indicators against the SDGs. This contributes to better accountability, as stakeholders can easily identify both topics of interest and topics they might miss. Overall, Nestlé's transparent reporting shows where it has had success in implementing its nutrition-related commitments, and where more progress is needed. The company is expected to release new commitments in 2021.

The Feeding Infants and Toddlers Study (FITS) in the US has explored the eating patterns and nutritional intake of children during their first four years of life. This initiative was expanded in 2014 to include older children (the Kids Nutrition and Health Study, KNHS) and additional countries; and now comprises China, Mexico, Russia, Australia, the US and the Philippines. The studies provide a comprehensive picture of children's dietary intakes, including nutrients, timing and types of foods consumed at each meal, and feeding practices. In 2019, Nestlé started research projects in Brazil, the United Arab Emirates and Nigeria. Since 2014, FITS and KNHS have resulted in more than 60 papers in collaboration with research partners around the world.



A

Following the completion of the 10 year-long Unilever Sustainable Living Plan (USLP), the company launched its new nutrition strategy 'Future Foods Initiative' in 2020 and published the report 'Transforming the world's food system for a more nutritious, more sustainable, and fairer future'. This outlines four ways the company attempts to lead change: 1) providing nutritious foods and balanced diets; 2) making plant-based choices available for all; 3) reducing food waste; and 4) producing food that is fair and doesn't cost the earth.

Unilever states its intention to "continue efforts on removal of regulatory hurdles to fortifying products with key micronutrients to help eradicate deficiencies." This is a governance best practice, as the company outlines where and how it aims to contribute to nutrition.

PwC is commissioned to verify selected indicators in its USLP. For nutrition, the proportion of company's products that meet its nutrient profiling model 'Highest Nutritional Standards' (HNS) is verified, i.e. "61% of portfolio in 2020." The company's Board's Audit Committee oversees the USLP assurance programme.

A1 Corporate Nutrition Strategy

To what extent have companies enhanced the integration of their nutrition strategies into their core business since 2018?

Since 2018, the quality of companies' nutrition strategies has increased notably: from 4.4 to 5.2 out of 10. On average, companies demonstrate commitments to greater integration of nutrition factors into core business considerations.

Nestlé maintains its first position in the ranking for A1 from 2018 with a score of 9.7 out of 10, followed by FrieslandCampina (9.1). Both companies make a strategic commitment to grow through a focus on nutrition, and formally set out how they address malnutrition through their commercial strategies. Both companies state they consider nutrition trends when making acquisitions, and that nutrition gets specific attention in their risk assessments. Unilever ranks third with a score of 8.8 and, in 2020, the company launched its new strategy, 'Future Foods Initiative', in which it outlines its commitments to produce nutritious and sustainable foods.

Of the 25 Index companies, Meiji (with new commitments to deliver more healthy products and increasing its focus on protein deficiencies in women and the elderly in Japan) and Grupo Bimbo (through stronger focus on nutrition management) improved their scores the most in this Criterion – by more than 3.5 points. However, 13 companies do not show any commitments to address the needs of groups at risk of malnutrition with affordable healthy products.

In general, most companies (23 of the 25) commit to placing a strategic focus on nutrition and health, and to delivering more healthy products – articulated either through their mission statement, a strategic commitment to grow through health and nutrition, or both. In 2018, BRF, Ferrero, Kraft Heinz, Lactalis and Tingyi showed very limited or no evidence of having a relevant nutrition strategy in place, according to ATNI methodology. These companies were encouraged to initiate a process of developing a formal global nutrition strategy, and this 2021 Index shows they all have done so; with BRF, Kraft Heinz and Ferrero making most progress.

The majority of companies (23) state a commitment to deliver more healthy foods – yet only 12 commit to addressing the specific needs of priority populations through providing healthy and affordable products, and only nine commit to doing so on a global basis. Of the 25 companies assessed, 12 identify priority populations in the markets in which they operate, based on priorities defined by relevant health and/or social care authorities.

Table 1. Companies' commitments to address malnutrition

	Company formally sets out how it intends to address malnutrition, either comprehensively or to a limited extent (new indicator)	Company acknowledged the WHO Global Action Plan for the Prevention and Control of NCDs 2013-2020	Company references SDGs (Goals 2, 3 and 12)
Ajinomoto	✓	✓	●
Arla	✓		●
BRF*	✓		✓
Campbell		✓	✓
Coca-Cola	✓		●
Conagra	✓	●	✓
Danone	✓	●	●
Ferrero	✓	●	✓
FrieslandCampina	✓	●	●
General Mills	✓	●	●
Grupo Bimbo	✓		✓
Kellogg	✓		●
Keurig Dr Pepper			
Kraft Heinz		✓	✓
Lactalis*		●	
Mars	✓		✓
Meiji	✓	●	✓
Mengniu*		●	✓
Mondelēz	✓	●	●
Nestlé	✓	●	●
PepsiCo	✓		●
Suntory*			✓
Tingyi*	✓	●	
Unilever	✓		●
Yili*		●	✓

● Extensive / Comprehensive / Well-structured
 ✓ Limited evidence found
 * Company did not provide information to ATNI

In the Global Index 2018, 17 companies recognized they have a role to play in tackling global nutrition challenges. For the 2021 Index, ATNI raised the bar: Companies were asked how they intended to tackle those issues, as described in their formal commercial strategies. Eighteen companies formally set out how they intend to address malnutrition through their commercial strategy to some extent (see table 1), yet only nine companies do so comprehensively (i.e. covering all forms of malnutrition).

In 2018, 12 of the assessed companies acknowledged their role in tackling nutrition challenges, referring to the WHO Global Action Plan for the Prevention and Control of NCDs. In 2021, Ajinomoto, Campbell and Kraft Heinz also publicly recognized the targets set out in the Global Action Plan. Eleven companies in 2018 also mentioned their role to contributing to nutrition-related Sustainable Development Goals (SDGs) 2 and 3 – and ATNI celebrates that most of the companies assessed (22) in the Global Index 2021 publicly commit to help delivering nutrition-specific SDGs (18 of these 22 companies cover three SDGs with specific nutrition targets: Goal 2: Zero Hunger, Goal 3: Ensure healthy lives and promote well-being for all at all ages, and Goal 12: Ensure sustainable consumption and production patterns).

Can companies demonstrate that their strategic commitments translate into nutrition-related business initiatives?

Table 2 highlights important elements of companies' performance in integrating nutrition in their decision-making processes. 21 of the companies conduct a nutrition-related business risk assessment (e.g., including consumer preference development versus healthy foods, food regulation issues, etc.) at least every two years (although only nine do so in an extensive manner).

Furthermore, 15 companies (a 50 percent increase from 2018) stated that nutrition was a factor in the company's decisions about acquisitions, disposals and forming joint ventures (JV) or other partnerships in the last three years. This indicates these companies have genuinely embedded a commitment to nutrition into their core business strategy and practices.

Table 2. Overview of performance indicators linked to integrating nutrition in the decision-making process

	Company conducts nutrition-related risk assessment at least every 2 years	Company factors nutrition into decisions about acquisitions, disposals and forming joint ventures (JV) in the last 3 years	Company conducted a strategic review of commercial opportunities re. addressing priority populations	Company addresses obesity and diet-related NCDs in its commercial nutrition strategy	Company addresses needs of priority populations in its commercial nutrition strategy
Ajinomoto		✓	▲	●	●
Arla	▲	✓	▲	●	▲
BRF*	▲			●	
Campbell	●	n/a		▲	
Coca-Cola	▲			●	▲
Conagra	●			▲	
Danone	▲	✓			▲
Ferrero	●			▲	
FrieslandCampina	●	✓	●	●	●
General Mills	▲	✓	▲	▲	▲
Grupo Bimbo	●	✓	▲	●	●
Keurig Dr Pepper				▲	
Kellogg	●	✓	●	▲	●
Kraft Heinz	▲	✓		●	▲
Lactalis*					
Mars	▲	✓	▲	●	▲
Meiji	●	✓	▲		▲
Mengniu*	▲			▲	
Mondelēz	●	✓	▲	●	●
Nestlé	●	✓	●	●	●
PepsiCo	▲	✓	▲	●	▲
Suntory*	▲				
Tingyi*	▲				
Unilever	▲	✓	▲	●	●
Yili*		✓			

● Extensive / Comprehensive / Well-structured
▲ Limited / Ad hoc
✓ Evidence found
n/a not applicable
* Company did not provide information to ATNI

In the last three years, 12 companies conducted a strategic review of commercial opportunities available in addressing the specific needs of priority populations (e.g., by reviewing guidance by public health authorities on needs for food fortification with micronutrients). However, only three (Kellogg, Nestlé and FrieslandCampina) did so comprehensively, taking into account company-internal strategies (e.g., portfolio, distribution, innovation strategy) and market research, and had them reviewed at board level. Additionally, 14 companies did market research to assess unmet needs of priority populations.

Twelve companies have a strategic and well-structured commercial approach to making products healthier and addressing obesity and nutrition-related NCD's. Yet, only eight have an equivalent approach to address unmet nutrition-related needs of priority populations, which includes undernutrition challenges, across the markets in which they are active.

Recommendations A1

To improve and accelerate efforts to enhance consumers' nutrition, leading food and beverage manufacturers are encouraged to:

- Continue integrating nutrition considerations in their core business functions: While 2021 results show more companies are committing to a strategic focus on nutrition and health, as articulated in their mission statements and strategic commitments, they can do more in terms of developing specific objectives and activities to improve nutrition and address malnutrition, and to publicly disclose their strategies.
- Conduct research into commercial opportunities available to address specific needs of priority populations, including products that target micronutrient deficiencies. Determining such business opportunities requires careful analysis of the population's nutritional needs, as defined by public authorities.

A2 Nutrition governance and management systems

Do companies have effective management systems to deliver their commitments on nutrition?

Since the 2018 Index, only some companies have demonstrated improvements in their nutrition policy and strengthened governance systems to deliver objectives articulated in their nutrition policies. The average score on Criterion A2 decreased from 4.3 to 3.2 out of 10. Nestlé leads the ranking on A2 with a score of 9.8, followed by FrieslandCampina with a score of 6.5, Kellogg with 6.4, and Unilever with 5.9. All of these companies have a comprehensive nutrition policy with clear objectives and board-level oversight.

Table 3. Oversight mechanisms in place for companies' nutrition strategy and/or programs

	Accountability and responsibility related to company's nutrition strategy and/or program				Internal business performance evaluation and auditing		
	CEO or other senior Executive	Committee that reports to the Board or an Executive Manager	Senior manager below Executive	No oversight assigned or no information	Nutrition strategy/program is approved by the Board	Annual internal audit of strategy/program delivery is in place	Annual management review of strategy/program delivery is in place
Ajinomoto	▲				✓		✓
Arla	▲				✓		
BRF*				✗			
Campbell	✗					✓	
Coca-Cola		✗					
Conagra	✗				✓		
Danone		✗			✓	✓	
Ferrero				✗			
FrieslandCampina	●				✓	✓	✓
General Mills	✗				✓		
Grupo Bimbo	▲	✗			✓	✓	✓
Keurig Dr Pepper			✗				
Kellogg	✗		●		✓		✓
Kraft Heinz	●				✓		✓
Lactalis*				✗			
Mars		✗			✓		
Meiji	✗				✓		
Mengniu*		✗					
Mondelēz	●				✓		✓
Nestlé	●				✓	✓	✓
PepsiCo	▲				✓		
Suntory*				✗			
Tingyi*				✗			
Unilever	▲				✓		✓
Yili*			✗				

- Remuneration specifically linked on nutrition objectives
- ▲ Remuneration linked to performance on CSR initiatives (of which nutrition is part)
- ✗ Responsibility assigned, but not linked to remuneration
- ✓ System in place
- * Company did not provide information to ATNI

Fifteen of the 25 companies assessed have their nutrition strategy/program approved by the board. Where companies position ultimate accountability for implementing their nutrition strategies is indicative of the priority granted to achieving results. Table 3 shows, 20 companies report they have generally assigned accountability for implementing the company's nutrition strategy and programs, and 13 companies assign accountability specifically to the CEO or other senior executive.

Only three companies (Mondelez, Nestlé and FrieslandCampina) link CEO remuneration to performance on nutrition objectives specifically. Only three companies (PepsiCo, Kellogg and Nestlé) publicly disclose the compensation arrangements related to implementing the company's nutrition strategy and/or program.

Only six companies have incorporated their strategy to address undernutrition/micronutrient deficiencies in the accountability arrangement for implementing the company's nutrition strategy. Some companies are doing this at the executive level (Unilever, Grupo Bimbo, Nestlé and FrieslandCampina) and others at a lower level (Kellogg and Danone). Similarly, only three companies (Grupo Bimbo, Nestlé and FrieslandCampina) incorporate affordability and availability of healthy products in this accountability arrangement, at the executive level.

Six of the assessed companies conduct a standard internal audit and eight companies conduct annual management reviews that cover nutrition issues. Important to highlight in this 2021 Index is that Meiji indicated that the company's nutrition strategy is subject to an annual internal audit, and Kraft Heinz shared evidence of having an annual management review in place. Grupo Bimbo, Nestlé and FrieslandCampina are the only three companies for whom the implementation of the nutrition strategy is approved at board level, is subject to a standard annual internal audit, and is subject to an annual management review.

What are companies doing to prevent food loss and waste?

A new element of the 2021 Index is consideration of the actions taken by companies to prevent FLW. Apart from the obvious environmental benefits, minimizing FLW substantially contributes to increasing access to food. Eighteen companies include FLW tracking and prevention tools in their management systems and, although all tools show very similar and positive results, value stream mapping appears to be the most popular choice. This entails locating food loss hotspots in key commodities in the upstream supply chain of companies, and then working with farmers to design and implement measures to prevent or curb these.

Recommendations A2

To improve and accelerate efforts towards robust nutrition governance and management systems, global food and beverage manufacturers are encouraged to:

- Link executive compensation to performance on nutrition objectives.
- Ensure nutrition plans and strategies are assessed regularly by internal audits and/or are subject to an annual management review to monitor progress. ATNI is concerned that the number of companies doing so has barely changed since 2018.

A3 Quality of reporting

How frequently and comprehensively do companies report on their efforts to tackle the double burden of malnutrition on a global basis?

In terms of reporting, most companies (24) publish formal, regular reports on their overall approach to tackling nutrition issues. This is an encouraging increase from the 18 that did so in 2018, and shows that companies are aware of the need to be more transparent and accountable on this issue.

Three-quarters of the companies (20) refer to preventing and tackling obesity and diet-related diseases to some extent, although fewer companies (13) report on undernutrition and/or micronutrient deficiencies to some extent. Only 16 companies' reporting covers global operations, and only 11 of these make specific reference to particular major markets in their reports.

Finally, these reports are subject to independent external review for only 10 companies. In 2018, this was the case for Campbell, Danone, Ferrero, Nestlé and Unilever, and in 2021 Ajinomoto, BRF, Coca-Cola, FrieslandCampina and PepsiCo joined this group.

Recommendations A3

To improve transparency about how they are improving consumers' access to nutrition, global food and beverage manufacturers assessed for this Index are encouraged to:

- Publicly and comprehensively report on their approach to tackling all forms of malnutrition issues globally and on an annual basis, within the standard corporate reporting cycle.
- Conduct external verification of nutrition data and commentary. External verification is industry best practice: it enhances accountability and should be adopted more widely. External verification should be carried out by an independent third-party to assure accuracy of reported nutrition-related data (e.g., calculation of sales generated from healthy products). In 2018, 17 companies did not conduct independent external review of their nutrition reports or of the nutrition information contained in other reports or on their websites. In 2021, 15 companies still need to take action on this.



Category B: Formulating appropriate products

The Global Index 2021 assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable, accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories. This chapter presents the results of Category B: Formulating appropriate products, which carries 35% of the weight of the overall score of the Corporate Profile methodology.

Category B consists of three criteria:

- B1 Product Profile results (20% of overall score)
- B2 Product formulation (7.5% of overall score)
- B3 Defining healthy and appropriate products (7.5% of overall score)

To perform well in this category a company should:

- Have a healthy product portfolio overall, measured in the Product Profile using the Health Star Rating (HSR) nutrient profiling model.
- Have healthier products than other companies within the same product category.
- Demonstrate improvements in product portfolio over time.
- Commit to improving the nutritional quality of foods and beverages with the goal of having healthier portfolios (e.g., through research and development — R&D — investment).
- Set and disclose reformulation targets and performance against those targets in a consistent way that is easy for stakeholders to understand.
- Provide healthy and appropriate foods that help to address undernutrition and micronutrient deficiencies (e.g., through evidence-based fortification of foods).
- Adopt and disclose a robust scientific and evidence-based nutrient profiling model (NPM) and apply it to all relevant products, or commit to using a government-endorsed NPM.
- Commit to fortifying foods of underlying nutritional quality and/or meeting established nutrition criteria.

Ranking on Formulating appropriate products

Danone leads Category B, followed by Nestlé and FrieslandCampina. Besides their relatively high scores in the Product Profile, these companies have adopted nutrient profiling models to guide their (re)formulation strategies and have defined relevant targets for most nutrients of public health interest.

B1 Product Profile **B2** Product formulation **B3** Defining healthy products

* Did not provide information to ATNI

Category context

It has become increasingly clear that food systems are failing to provide nutritious foods that support healthy diets and protect the planet. Levels of ingredients and nutrients known to contribute to health are consumed in insufficient quantities (such as fruits, vegetables, and wholegrains). At the same time, the world has seen a continued shift towards the consumption of packaged foods (or highly processed foods) and beverages, which are often high in fat, salt, and sugar, and are associated with obesity and nutrition-related non-communicable diseases (NCDs). The importance of good nutrition has been underscored by the COVID-19 pandemic, with an accelerated interest in health and wellness among consumers and regulators (see Box 1 below)

This Category focuses on assessing the nutritional quality of companies' portfolios, relative product quality within categories compared to peers and changes in portfolio healthiness over time (together these constitute criterion B1, Product Profile). Companies are assessed on their efforts towards improving the nutritional quality of their products (see Box 2 below) and developing appropriate products that help tackle all forms of malnutrition, including micronutrient deficiencies.

The Product Profile, integrated in criterion B1, is an independent assessment of the nutritional quality of companies' product portfolios. The updated methodology also analyzes the nutritional quality within product categories, and improvements of product portfolios over time.

ATNI rates companies using the [Health Star Rating](#) (HSR) model. The HSR examines the content of positive nutrients (fiber, protein, fruits, nuts, legumes, and vegetables) and nutrients of concern (saturated fats, added sugar, and salt) within individual products (per 100ml or 100g), and gives them a score between 0.5 and 5.0. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), and additional data input from Innova Market Insights.

The percentage of global sales represented by the products included in the research for each of the Index companies has significantly expanded compared to the previous Global Index Product Profile in 2018, following the inclusion of new major markets. The number of distinct products assessed has increased from 20,685 in 2018 to 38,176 in 2021.

Companies have been more engaging and active in reviewing and, where needed, revising product lists and nutrient information in specific markets. This has improved the quality and representation of the Product Profile results and allows for a better comparison of companies' performance relative to peers.

Aside from reformulating their products, companies are assessed on their efforts to improve products to deliver more positive ingredients and nutrients — such as fiber, whole grains, fruit and vegetables, and essential micronutrients to tackle the rising challenge of micronutrient deficiencies.

Furthermore, companies can positively impact diets by offering more appropriate portion sizes and evaluating impact on consumer behavior.

ATNI has published a new research paper with an analysis of potential inequities in the nutritional quality of the 25 companies' product portfolios across 11 markets and 26 product categories.

Box 1: Covid-19 and nutrition policy

In July 2020, international organizations called on governments to scale up “double-duty” actions — those that simultaneously address the problems of undernutrition and obesity — in their COVID-19 response, to reduce negative impacts on food security and nutrition. Local and national governments are urged, or have already implemented, new policies to support healthy diets which are expected to further impact companies’ product formulation and reformulation efforts.

Philippines: Policymakers have cited COVID-19 correlation with unhealthy diets to support legislation seeking to eliminate trans-fats from the food supply.

Mexico: A group of national and international organizations joined forces to compile specific recommendations for government on addressing the nutrition impacts of Covid-19, including the creation of an emergency fund to protect nutrition of the most vulnerable, to adhere to the World Health Organization (WHO) Code of marketing of breast-milk substitute (BMS), and to implement behavioral strategies to decrease consumption of ‘ultra-processed’ food and beverages. In addition, Oaxaca became the first state in the country to ban the sale of high-calorie packaged foods and sugar-sweetened drinks to minors.

UK: In light of COVID-19 and links between obesity and higher risk for severe illness and mortality, as part of a national obesity strategy, the UK government introduced new legislation banning advertisements of foods high in fat, salt, and sugar in TV and online before 9PM. From April 2022, the promotion of unhealthy foods in supermarkets will also be prohibited.

Box 2: Impacts of food reformulation

Product (re)formulation is a strategy used by food manufacturers to improve product composition. The objective of food reformulation is to make healthier versions of existing products available for all consumers, and evidence shows it has the potential to improve public health. According to an OECD analysis of 42 countries, achieving a 20% calorie reduction in foods high in calories, sugar, salt, and saturated fats can result in up to 1.1 million avoided cases per year of cardiovascular diseases, diabetes, and cancer. It also offers economic benefits, such as savings in a country’s health expenditure.

Reformulation efforts should be part of a comprehensive strategy to improve the nutritional quality of products, contribute to reducing dietary intakes of salt, sugar, and unhealthy fats, and improve intake of positive nutrients like whole grains, fruits, and vegetables.

Relevant changes in methodology

For the first time in the Global Index, the results from the Product Profile for each company are integrated in the scoring algorithm as criterion B1 and contribute to the overall scores and ranking. The Product Profile results alone account for 20% of the weight of the companies' overall Index score.

The Product Profile is applied using the same nutrient profiling model (HSR) as ATNI's Global Index 2018, but with two additional scored elements, which are explained in the section 'B1 Product Profile' of this chapter.

For more information about the Product Profile methodology and overall-results, access the full [Product Profile 2021 report](#). Results from the complementary analysis undertaken to assess whether companies' products are suitable to be marketed to children using WHO regional nutrient profiling models are found in the Marketing section (chapter D).

Apart from the integration of Product Profile results in criterion B1, some other important adjustments have been made in Category B. These include:

- The number of scored indicators has been reduced from 92 in 2018 to 33 in 2021, as because of the integration of the Product Profile, product category-specific reformulation indicators used in 2018 became redundant.
- In addition to assessing companies' nutrient profiling models (NPM) (criterion B3), ATNI evaluates companies' efforts to benchmark their definitions of 'healthy' against external standards (e.g., HSR). This has been included to assess whether company's criteria and definitions are, as far as possible, aligned with and reflect public health priorities and recommendations.
- ATNI asks companies to publicly disclose the percentage of 'healthy' products (according to the company's definition of 'healthy') in their total global product portfolio and the number of 'healthy' products introduced on a year-on-year basis. In the previous Index, public disclosure was not required.
- A food loss and waste (FLW) indicator has been included to shed light on the extent to which companies take measures to improve food supply chain efficiency to reduce FLW and improve access to nutrition.

More details about the changes in the methodology can be found in the [methodology section](#) of this Index.

Key findings

- The average score in Category B is 4.1 out of 10. In 2018 the average was 3.3 which did not include Product Profile results. If we exclude Product Profile results for this Index (criterion B1) and exclude companies new to the Index, the average score would be 3.4, slightly up compared to the 3.3 average in 2018.
- Substantial improvements were made by some companies in their reformulation efforts (criterion B2), with improved commitments to deliver healthy foods and more companies defining (re)formulation targets for relevant nutrients.
- Danone leads this Category with a score of 7.2, followed by Nestlé (7.1) and FrieslandCampina (6.8). These companies perform strongly in the Product Profile (B1), have adopted robust nutrient profiling models (NPMs), and have set relevant targets for most nutrients that are of public health priority. Compared to 2018, Arla, Mars, Kraft Heinz, and Grupo Bimbo show significant progress in their scores and Category B rankings, by adopting new NPMs and/or new commitments on reformulation (e.g. new sodium reduction targets).

- **Product Profile:**

At overall portfolio level out of 38,176 distinct products sold by the 25 companies globally 11,797 (31%) meet the healthy threshold (a Health Star Rating of 3.5 stars or more); the same percentage as in 2018. For only five companies 50% or more of their products included in the assessment meet the healthy threshold.

Nine companies show an increase in mean HSR of products in the markets selected. This is the third scored component of the Product Profile. Nestlé showed the largest increase in mean HSR between the 2018 and 2021 Product Profile (1.9 to 2.7), comparing products in eight countries that were common in both assessments. In the USA (the largest analyzed market for Nestlé) the company divested its 'Confectionery' and 'Ice Cream' businesses, which had a profound effect on overall results.

Danone achieves a mean HSR of 3.5 for all products included in the assessment. It is the only company to meet the healthy threshold at portfolio-level when results are sales-weighted.

- Compared to 2018, more companies define targets for nutrients of concern, with the most frequently reported targets being for sodium and trans-fat. However, Unilever is the only company to define a target on positive nutrients for all products, globally.
- Twelve companies provide examples of developing specific products designed to help address malnutrition (e.g., through micronutrient fortification) in the last three years, aimed at children over five years old. This area received the most examples, implying that companies' efforts are mostly concentrated in this demographic.
- Nine companies, four more than in 2018, have adopted fortification policies in line with international guidelines. However, just six companies commit to only fortify products of high underlying nutritional quality, or meet certain nutrition criteria.
- While it is positive to see that 14 companies have adopted an NPM in some form, few companies disclose how their systems or definitions of 'healthy' align with external benchmarks. Only three (Arla, Danone and FrieslandCampina) provide evidence that their definition of healthy products corresponds to external benchmarks (HSR \geq 3.5).

General Recommendations

To accelerate and improve their commitments, strategies and actions on portfolio healthiness, product formulation, and NPMs, ATNI encourages food and beverage manufacturers to:

- Adopt a nutrient profiling model (NPM), preferably government-endorsed, aligned with internationally recognized guidelines on diet and nutritional quality.
- Improve transparency on the proportion of healthy products in their portfolio.
- Define and support time-bound nutrient targets in alignment with national and international standards, such as WHO's newly-released sodium benchmarks.
- Publicly disclose a fortification policy and commit to only fortify products of high underlying nutritional quality or those that meet nutrition criteria (e.g., criteria in the NPM).
- Strengthen R&D investments and disclosure on strategies to develop products that address malnutrition, particularly micronutrient deficiencies.

Noteworthy changes and best practices



Kraft Heinz shows the highest improvement in this category compared to the Global Index 2018. The company's score has improved from 0.6 to 3.3 in 2021. Kraft Heinz has adopted new 'Global Nutritional Guidelines' which list thresholds for nutrients per product category, which is considered by ATNI a precursor to a full NPM. The company reports exceeding its target of 70 percent compliance with the guidelines four years early, and has committed to achieving 85 percent portfolio compliance by 2025. The company discloses the number of products that meet its guidelines, at 76 percent in 2019 according to the company's 2020 Environmental Social Governance (ESG) Report.

B



Danone disclosed its benchmark on alignment of its definition of healthy categories with HSR. Danone's 'healthy categories' are benchmarked against the HSR and the information is publicly disclosed. The percentage of healthy products in Danone's portfolio is 90 percent according to the company's own criteria, and accounts for 88.3% of sales (water represents about two-thirds of Danone's total sales in volume) when utilizing the HSR healthy threshold (HSR \geq 3.5). In the Product Profile, a total of 1,626 products across 10 markets were assessed for Danone, and 997 (61 percent) met the 'healthy' threshold. The company uses volume data excluding plant-based products, whilst the Product Profile utilized retail sales including the plant-based segment- one of the reasons the company's figures differ from those of the Product Profile.

B



Kellogg reports using an independent NPM, Nutri-Score, as a tool to reformulate products. The company has developed its own 'K Score system,' which calculates overall nutritional quality scores for each product. The K Score is based on a combination of the Nutri-Score model, clean label score (i.e., no use of artificial colors and preservatives), and a 'micronutrient score' (based on the quantity of vitamins and minerals present at a claimable level.)

B



In 2020, Grupo Bimbo published its own NPM to inform nutritional guidelines. Grupo Bimbo's NPM is validated using a government-endorsed system (UK Food Standards Agency model). Their nutrition strategy includes, among others, a new commitment for products in the 'daily' segment to reach 100% compliance with its nutritional profile by 2023 (extended from 2020). The company's nutritional guidelines include definitions of product categories and category specific nutrient thresholds, which helps in holding the company to account for its commitments.

B



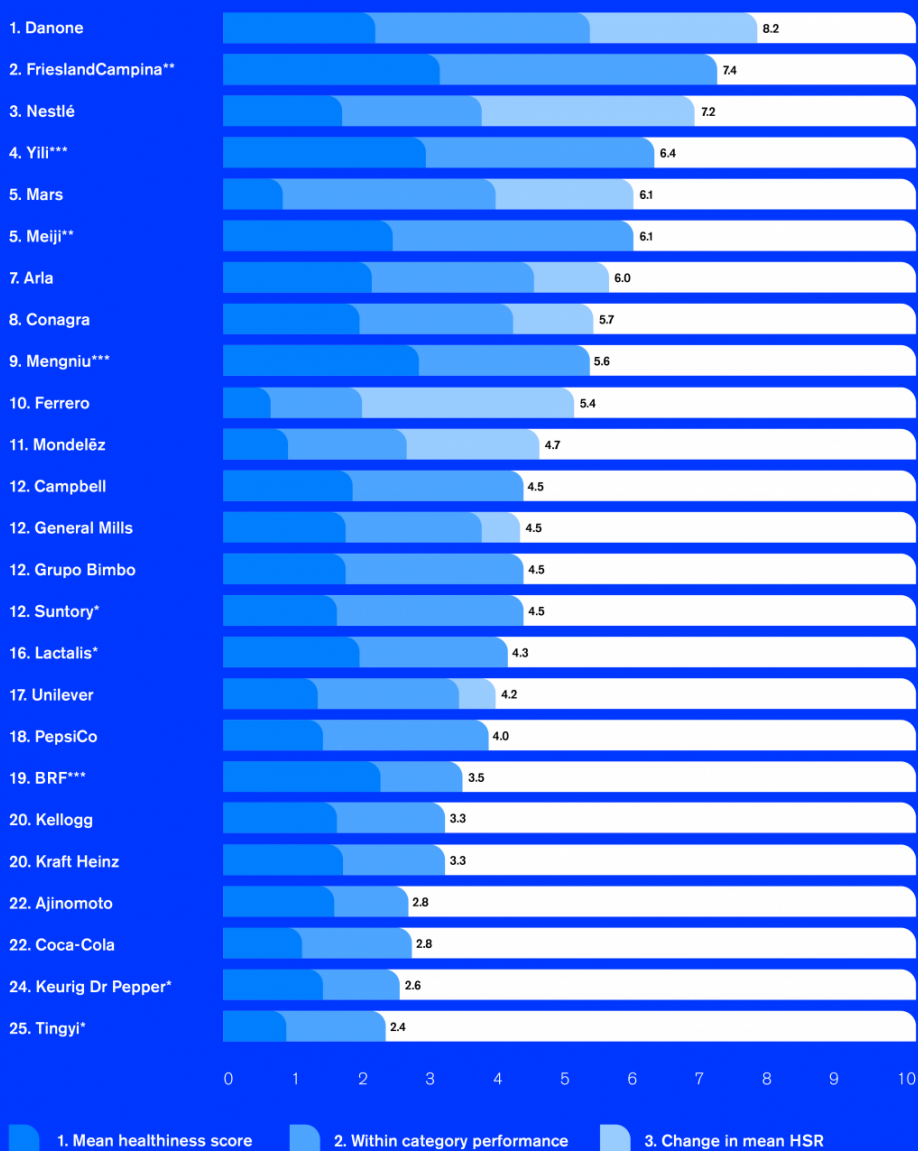
Unilever sets new goals to deliver positive nutrition. Unilever released a Foods & Refreshment strategy as part of its newly- defined 'Boldly Healthy' commitments in 2020 and the longer-term 'Future Foods' strategy. In addition to its reformulation goal of 70 percent of foods to meet company's nutrition criteria by 2022, **the company has committed to double the number of products sold that deliver positive nutrition by 2025.** Unilever defines 'nutrition positive' those foods which contain significant, impactful amounts of crucial ingredients and macronutrients, like vegetables or proteins, and/or micronutrients, like vitamins and minerals. The company informed ATNI it is in the process of revising its NPM or 'Unilever Highest Nutritional Standards' (HNS) to include positive nutrients as well as a sugar benchmarks for all product groups.

Apart from this, the company's Knorr brand has defined the ambition to achieve 25% of Knorr's portfolio containing Future 50 Foods and 50% of the portfolio to be plant-based by 2025. Unilever has partnered with World Wildlife Fund (WWF) and other experts to identify 50 plant-based ingredients (Future 50 Foods), based on their nutritional value and relative impact on the environment.

B1: Product Profile results

Danone ranks first in the Product Profile with a score of 8.2 out of 10, followed by FrieslandCampina (7.4) and Nestlé (7.2). Danone achieves the highest mean healthiness score (6.9 or HSR of 3.5) — an indication of the nutritional quality of the company's products in best-selling categories across major markets. Mars and Danone achieve the highest score in the second scored element, which measures the relative healthiness of product categories compared to peers. For Ferrero, Mondelez and Nestlé, their improvements in mean HSR in selected markets- i.e. the third scored element, contribute significantly to their final Product Profile scores (illustrated in light blue, below).

Figure 2. Product Profile scores and ranking



Note: HSR = Health Star Rating
 * Company did not provide information to ATNI
 ** Company is exempt from third scored element (Change in mean HSR) as this only applies to companies previously assessed in Global Index 2018.
 FrieslandCampina and Meiji are exempt as countries in scope of analysis accounted for less than 5% of estimated retail sales in 2019. For companies for which the third scored element is not applicable, only the average of the first two scored elements is taken into account.
 *** Both * and ** apply

What is assessed in the Product Profile?

Up to 10 major markets are selected for analysis for each company, aiming to cover 80% or more of their global retail sales. The top five best-selling product categories within each market were identified according to the Euromonitor International database, to avoid assessing large numbers of niche products with low sales. Please see Table 1 in Annex. For more information, see the Global Index [methodology](#).

The products assessed in the Product Profile account for over 60% of the global retail sales in 2019 for all 25 companies combined. Table 2 (in Annex) shows the range of retail sales coverage for each company. It is important to note that for Coca-Cola, Danone, Ferrero, Lactalis, Mondelez and Unilever between 50-60% of the companies' 2019 global retail sales are covered in the Product Profile within the countries and categories in scope (i.e., excluding coffee and packaged tea, and limiting to the top five best-selling categories for each market selected in the assessment). For Nestlé, the Product Profile covers between 45-50% of the company's estimated 2019 retail sales, as the company has a very diversified product portfolio and is active in numerous markets. For the rest of the companies, the Product Profile accounts for 60% or more of their estimated 2019 global retail sales.

How is the Product Profile score calculated?

ATNI's Product Profile 2021 is composed of three scored elements:

B1.1 Portfolio mean healthiness score. This represents the nutritional quality of companies' overall product portfolios in major markets. A score of 10 means the company derives its sales only from 'healthy' products.

B1.2 Within product category score. Companies have the potential to make a positive impact by providing healthier options within categories. In product categories in which two or more companies are active, a performance score is calculated based on the company mean HSR in that category compared to peers. A score of 10 means a company has, on average, the 'healthiest' products in selected categories compared to peers.

B1.3 Change over time in mean HSR score. This element quantifies the rate of improvement in portfolio 'healthiness', based on the difference in the companies' overall sales-weighted mean HSR score between 2018 and 2021. It only applies to companies assessed in both Product Profiles and takes into account only those countries included in both assessments.

How healthy are companies' portfolios?

Overall, 31% of products assessed in the Product Profile (11,797 out of 38,176) for all companies combined met the healthy threshold of $HSR \geq 3.5$. This is the same proportion found in the Global Index 2018 Product Profile (when less products were assessed in less markets).

Five companies (Arla, Danone, ConAgra, FrieslandCampina, and Lactalis) have a product portfolio in which more than 50% of distinct products meet the healthy threshold. Mondelez, Ajinomoto and Ferrero are estimated to have less than 10% of distinct products in their portfolio that can be considered healthy. These results show most companies are still falling short in supplying healthier alternatives globally. Please see Figure 4 (in Annex).

To what extent do companies generate sales from healthy products?

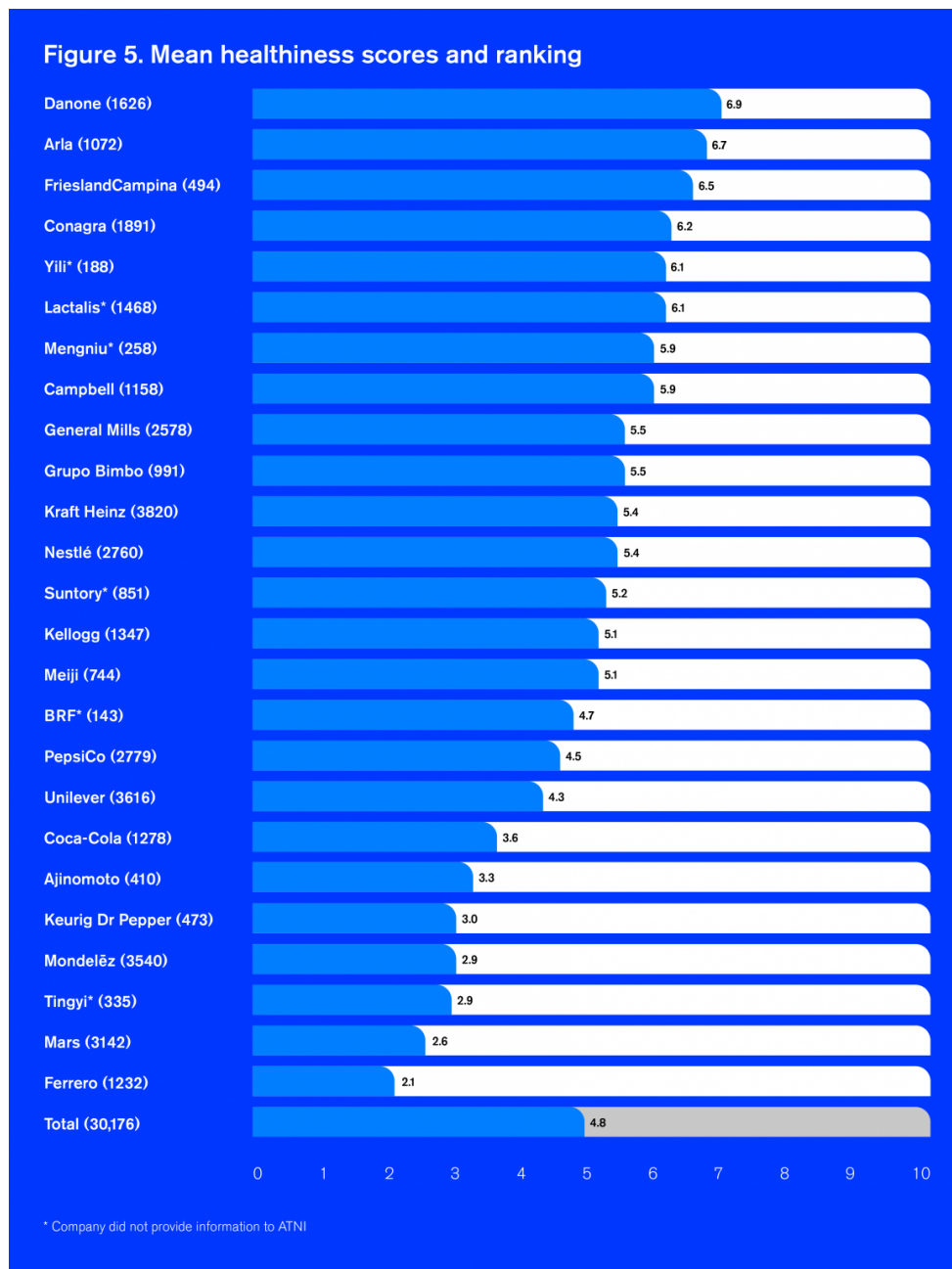
Taking into account the sales values of products, nine companies were found to derive more sales from healthy products ($HSR \geq 3.5$) compared to less healthy options ($HSR < 3.5$). Only four companies (Arla, Danone, FrieslandCampina, and Lactalis) were found to derive half or more of their sales captured in the Product Profile from healthy products.

B1.1 Portfolio-level mean healthiness score

The mean sales-weighted HSRs at portfolio-level for companies ranged from 1.0 to 3.5 (out of 5.0). The mean HSR for all companies combined was 2.4 (out of 5.0). ATNI turns this into a healthiness score between 1 and 10 (by doubling the star rating) resulting in a healthiness score 4.8 out of 10, as illustrated in figure 5 (below).

Danone, Arla and FrieslandCampina show the highest overall mean HSR taking into account sales values. Danone is the only Index company to achieve an overall mean HSR of 3.5 out of 5 — meeting the healthy threshold — which translates into a mean healthiness score of 6.9 out of 10. Sales are taken to apply a weighting that is most relevant for health impact (assuming sales correlate with consumption), as well as company commercial value.

Figure 5 below shows that mean healthiness scores and ranking of companies, and in brackets the number of products assessed.



B1.2 Within Product Category score

The composition of companies' product portfolios varies widely. Three of the Index companies primarily sell beverages (Coca-Cola, Keurig Dr Pepper and Suntory), six companies primarily sell dairy products (Arla, Mengniu, Danone, Lactalis, FrieslandCampina and Yili), and three companies derive majority of their global sales from confectionery (Ferrero, Mars and Mondelez). This second scored element in the Product Profile has been introduced to encourage companies to develop healthier products within categories irrespective of their overall portfolio composition.

In product categories in which two or more companies are active, a performance score is calculated based on the company's category mean HSR (average nutritional quality of products assessed within a category) compared to peers.

Danone and Mars achieve the highest score (9.6 out of 10) in this element of the Product Profile. Table 3 shows Mars is assessed across eight product categories in which it competes with one or more peers, and ranks first in 'Confectionery' and 'Ready Meals', and second in 'Rice, Pasta and Noodles.' Danone is assessed across four categories, and achieves a shared first rank in 'Bottled water- pure,' ranks first in 'Bottled Water -other' and second in 'Dairy' and 'Ready-to-drink Coffee.'

FrieslandCampina, Suntory and Grupo Bimbo also perform relatively well compared to peers in the same product categories (see table 3). FrieslandCampina ranks third in the 'Dairy' category, with the company's 484 Dairy products assessed across 10 markets achieving a mean HSR of 3.4 out of 5. This is well above the category average of 2.9. For Suntory, its 'Ready-to-drink Tea' category achieves the highest mean HSR of 2.1, compared to seven other companies also assessed. Despite this finding, a mean HSR of 2.1 is considered low, and reflects the fact most Ready-to-drink teas still contain unhealthy levels of added sugar.

Table 3 (in Annex) shows there are significant differences in the mean HSR of company products within product categories. For example, in 'Sweet Spreads', Conagra's 14 analyzed products achieved the highest mean HSR score of 4.2 out of 5, while Ferrero's 16 products achieved a mean HSR score of just 0.8.

B1.3 Change in sales-weighted mean HSR score

In this third scored element of the Product Profile, for every 0.1 increase in overall sales-weighted mean HSR between 2018 and 2021, a score of two is credited; leading to a maximum performance of 10 if the company achieves an increase of 0.5 HSR or more. The products from 18 companies for which data were available in both Global Index 2018 Product Profile and Global Index 2021 Product Profile were included in this analysis. Results are shown in table 4 (below). 9 out of these 18 companies showed an improved mean HSR and therefore received a score. The other companies did not receive a score as their mean HSR showed a slight decrease or remained the same.

Companies can make a positive impact by accelerating their innovation and reformulation strategies, as well as acquisitions of healthy products and divestments of unhealthier product lines. This change analysis relies on the quality of information available in both years, and it is important to highlight that this change might not be a precise representation of companies' reformulation efforts over time. Instead, this analysis captures the differences over time of sales at category level as well as change in overall portfolio compositions.

Nine companies show an increase in mean HSR:

1. Nestlé showed the largest increase in mean HSR between the 2018 and 2021 Product Profile (mean HSR= 1.9 to 2.7), with eight countries included in both assessments. The large increase observed in mean HSR is partially attributed to some key changes in category sales. For example, the proportion of sales derived from the 'Dairy' category increased from 19% to 24%, and 'Confectionery' sales decreased from 21% to 15%. Of the eight countries included in this analysis, HSR increased the most for the USA, because the company divested its 'Confectionery' and 'Ice Cream' businesses there. The USA is the largest market for Nestlé among the countries included in analysis, so these divestments had a profound effect on overall results.

2. Between 2018 and 2021, Ferrero showed an increase in mean HSR when examining the same countries in both Product Profiles (mean HSR=0.7 to 1.2) — largely driven by the acquisition of biscuit and fruit snack brands in the USA. Despite this improvement, Ferrero still had one of the lowest mean healthiness scores among companies assessed in both 2018 and 2021.
3. For Danone, changes to the healthiness and proportion of sales from the 'Dairy' category, across most countries and overall, have driven its mean HSR improvement. It is important to note that ATNI follows Euromonitor International category classifications and, for Dairy, this also includes plant-based products (including former WhiteWave brands).
4. The increase observed for Mars in mean HSR (1.0 to 1.3) between 2018 and 2021, when examining the same countries included in both Global Index Product Profile reports, cannot be attributed to sale changes at category-level. Instead, it's most likely due to an increase in mean HSR of 'Confectionery' products in the USA and the fact that the company provided feedback on product listings and nutrient information in 2021 (but not in 2018). Despite this improvement, Mars still had the second lowest mean healthiness score in the 2021 Product Profile.
5. For Mondelez, 'Confectionery' had a higher overall mean HSR in 2021 compared to 2018.
6. For Arla, no major differences in category-level sales were observed, as only one category (Dairy) was included in both the 2018 and 2021 assessments. For Arla, the change appears to be driven solely by an increase in the mean HSR for UK 'Dairy' products with a larger number of yogurt products included in 2021 versus 2018.
7. Conagra's increase in the four countries for which data were available in both 2018 and 2021 is partly explained by the increase in the proportion of sales from 'Processed Fruit and Vegetables.'
8. General Mills performance is linked to a few category changes. For example, products in the 'Baked Goods' category had less weight in the 2021 assessment, while products from the 'Soup' category contributed more to the sales-weighted mean HSR results.
9. Finally, Unilever also showed an increase in mean HSR between the 2018 and 2021 Product Profile, based on the seven countries included in both assessments (mean HSR=2.1 to 2.2; see table 4). Unilever's performance is linked to a few category changes. For example, the 'RTD Tea' represented a much larger proportion of sales in 2018 versus 2021, and 'Sauces, Dressings and Condiments', a much smaller proportion in 2018 versus 2021.

More information on companies' performances can be found in their individual scorecards Product Profile section and the full Product Profile 2021 [report](#).

Table 4. Change in mean HSR scores

	Countries included in analysis	No. of products included in analysis		Sales-weighted mean HSR**		Difference in sales-weighted mean HSR 2018-2021	3. Change in HSR score*** (out of 10)
		2018	2021	2018	2021		
Nestlé	Australia, China, Hong Kong, India, Mexico, South Africa, UK, USA	1,86	1,756	1.9	2.7	0.8	10
Ferrero	Australia, China, Hong Kong, India, Mexico, New Zealand, UK, USA	260	846	0.7	1.2	0.5	10
Danone	Australia, China, Hong Kong, Mexico, South Africa, UK, USA	759	1,004	3.1	3.5	0.4	8
Mars	Australia, China, Hong Kong, India, Mexico, New Zealand, South Africa, UK, USA	1,526	3,117	1.0	1.3	0.3	6
Mondelez	Australia, China, India, Mexico, New Zealand, South Africa, UK, USA	2,048	3,129	1.3	1.6	0.3	6
Arla	Australia, Hong Kong, UK, USA	108	228	3.0	3.2	0.2	4
Conagra	India, Mexico, New Zealand, USA	1,028	1,889	2.9	3.1	0.2	4
General Mills	Australia, China, India, Mexico, New Zealand, South Africa, UK, USA	1,542	2,095	2.6	2.7	0.1	2
Unilever	Australia, China, India, Mexico, South Africa, UK, USA	1,416	2,069	2.1	2.2	0.1	2
Campbell	Mexico, USA	977	1,014	3.0	2.9	-0.1	0
Kraft Heinz	Australia, China, Hong Kong, India, Mexico, New Zealand, UK, USA	2,142	3,209	2.8	2.7	-0.1	0
Lactalis*	Australia, Mexico, South Africa, UK, USA	509	696	3.3	3.2	-0.1	0
Suntory*	Australia, China, Hong Kong, New Zealand, South Africa, UK	503	503	1.8	1.7	-0.1	0
Tingyi*	China	137	335	1.6	1.4	-0.2	0
Coca-Cola	Australia, China, Hong Kong, India, Mexico, New Zealand, South Africa, UK, USA	1,186	1,233	1.8	1.8	0	0
Grupo Bimbo	China, Mexico, UK, USA	477	790	2.7	2.7	0	0
Kellogg	Australia, Hong Kong, India, Mexico, New Zealand, South Africa, UK, USA	1,310	1,194	2.5	2.5	0	0
PepsiCo	Australia, China, Hong Kong, India, Mexico, New Zealand, South Africa, UK, USA	1,813	2,255	2.3	2.3	0	0

* Company did not provide information to ATNI

**Mean HSR for overlapping countries only; does not equal figures considered in figure 6.

HSR: Health Star Rating.

*** For every 0.1 increase in overall sales-weighted mean HSR for 2020 vs. 2018 results (applicable only to companies assessed in both Indexes and taking into account only those countries included in both), a score of 2 is credited. This leads to a maximum performance of 10 if the company achieves an increase of 0.5 HSR or more. Yili, BRF, Ajinomoto, Mengniu and KDP are excluded from this analysis as no 2018 data are available and/or they are new Index companies. FrieslandCampina and Meiji are also excluded, as countries in scope of analysis accounted for less than five percent of their estimated retail sales in 2019.

ATNI has published a new research paper with an analysis of potential inequities in the nutritional quality of the 25 companies' product portfolios across 11 markets and 26 product categories.

Recommendations B1

Product Profile results illustrate that companies can — and must — do much more to improve the overall nutritional quality of their product portfolios and accelerate efforts to derive more sales from healthy options. ATNI encourages global food and beverage manufacturers to:

- Enhance efforts to improve the healthiness of product portfolios (g., through improved reformulation or acquisitions/divestments with a focus on nutrition).
- Support government reformulation initiatives and define SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) targets for key nutrients critical to public health — such as reductions in sodium — and improve accountability through better reporting.
- Provide more nutrition information on labels. The information should, at minimum, align with Codex Alimentarius standards (see Category F on Labeling).
- Engage with ATNI to further improve the accuracy and comprehensiveness of the Product Profile.

B2: Product formulation

ATNI's Product Profile results show how companies have significant scope to better support consumers in making healthier choices by improving the nutritional quality of foods. This criterion addresses companies' efforts to do so through new product development/formulation and reformulation strategies, to address all forms of malnutrition, including micronutrient deficiencies.

Do companies disclose information about the healthiness of their portfolios?

While companies' transparency about the healthiness of their products has not improved significantly since 2018, eight companies publicly disclose the number of products that meet their healthy criteria. This allows for comparison with the ATNI Product Profile results and better understanding of the nutritional quality of companies' overall portfolios. ATNI encourages companies to adopt a government-endorsed NPM and publish how the internal model used aligns with external standards.

Companies' definition of 'healthy' vs. external benchmarks

The 2021 Global Index methodology includes a new indicator to track whether companies' nutrient profiling models, or other systems used to define healthy products, are aligned with external standards — specifically the HSR, as it is the model used in ATNI's Product Profile. Index results show seven companies have conducted such exercises, but only Danone, Unilever, Frieslandcampina and Grupo Bimbo provide relevant information in the public domain. Arla, FrieslandCampina and Danone showed evidence that their definition of healthy products corresponds with the HSR ≥ 3.5 definition of 'healthy' (with less than 10% deviation in estimated percentage of 'healthy' products).

Table 5 (in Annex) shows there are significant gaps between ATNI's Product Profile estimates on companies' proportion of healthy sales and those reported by companies. The information presented in table 5, however, must be interpreted carefully. For example, ATNI relies on retail sales values, while some companies report sales by volumes. Discrepancies might also occur because of differences in product category definitions. Danone's calculations, for example, exclude plant-based products, and for Unilever, ATNI's Product Profile excludes foods like plain coffee and tea, which are significant sources of revenue for the company.

The only company that reports a lower percentage of healthy products than in ATNI's Product Profile is Campbell. This might be because of the strict company definition of healthy (products must "meet regional definitions for healthy, which include strict limits for total fat, saturated fat, cholesterol and sodium, AND have a requirement for a good source of at least one beneficial nutrient.") compared to ATNI's Products Profile healthy threshold (HSR ≥ 3.5).

Have companies improved on the nutritional targets to (re)formulate products?

Product formulation and reformulation should be driven by specific and transparent definitions of which products are considered to meet 'healthy' thresholds or nutrition criteria, ideally described by companies' NPMs (see Criterion B2).

Since the 2018 Index, Ajinomoto, BRF and Kraft Heinz, have defined a target for at least one nutrient. Kraft Heinz shows major progress with its newly-adopted NPM '*Global Nutrition Guidelines*', defining nutrient targets by product category, with upper limits for nutrients of concern (i.e., calories, sodium and saturated fat). In 2020, the company set a new goal to achieve 85% compliance with its targets by 2025.

Companies' commitments to (re)formulate products according to well-defined nutritional targets were extensively assessed, and an overview is shown in Table 6 (see below). Most companies (19) define one or more targets to (re)formulate their products. Of the 53 targets identified, 32 covered all products across relevant categories, globally. Overall, Nestlé, Unilever, FrieslandCampina, Danone, and Arla achieve the highest scores on (re)formulation targets across a range of relevant product categories.

Sodium and trans fat are the nutrients for which most defined targets. The 11 International Food and Beverage Alliance (IFBA) member companies in the Index are credited for the same trans fat target, given their commitment towards WHO's 2023 goal to eliminate trans-fat from food supply.

Arla, Danone, FrieslandCampina, Mars, Nestlé, and Unilever have set at least one target for all relevant nutrients globally. Grupo Bimbo, Mars, Nestlé, and Unilever are the only companies that define a target for whole grains, and only Mars, Nestlé and Unilever do so for fruits, vegetables, nuts, and legumes (FVNL). Unilever shows industry best-practice by defining targets for positive nutrients (see Best Practices above).

Table 6. Overview of product (re)formulation targets

	Ajinomoto	Arla	BRF*	Campbell	Coca-Cola	Conagra	Danone	Ferrero	Friesland-Campina	General Mills	Grupo Bimbo	Keurig Dr Pepper	Kellogg	Kraft Heinz	Lactalis*	Mars	Meiji	Mengniu*	Mondelēz	Nestlé	PepsiCo	Santitas*	Tingyi*	Unilever	Yili*
Salt/sodium	▲	●	●	n/a	▲	▲	▲	▲	▲	▲	n/a	▲	▲	▲	▲	▲	▲	▲	▲	●	●	n/a	●	●	
Trans fat	n/a	●	●	n/a	●	●	●	●	●	●	n/a	●	●	●	●	▲	▲	n/a	●	●	●	n/a	●	●	n/a
Saturated fat	●	●	●	n/a	●	●	●	●	●	▲	n/a	▲	●	▲	▲	▲	▲	▲	▲	●	●	n/a	●	●	
Added sugar/calories	●	●	●	▲	●	●	●	●	●	▲	▲	▲	▲	▲	▲	▲	▲	▲	▲	●	●	▲	▲	▲	
Fruit, vegetables, nuts and legumes	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	▲	▲	n/a	▲	▲	▲	▲	▲	▲	
Whole grains	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	▲	n/a	n/a	n/a	n/a	n/a	▲	▲	n/a	●	▲	▲	n/a	●	n/a	

Note: Depending on company portfolio, selected targets were considered not applicable. For example, a target to reduce saturated fat in carbonated drinks is not applicable, as these products do not contain saturated fat.
 ▲ New target compared to 2018
 Light blue: Target expired or credited in 2018, but not found in 2021
 ● Target covers all relevant products globally
 ▲ Target is either not fully specified and/or does not cover all relevant products
 n/a Target is not applicable to company based on products
 * Not filled indicates no relevant target was defined/no information found in the public domain.
 * Company did not provide information to ATNI

ATNI encourages companies to define (re)formulation commitments according to these principles:

- Commitments should relate to absolute nutrient levels based on a weight, volume, or calorie basis. In the case of relative targets to increase or decrease nutrients compared to a baseline date, a full specification of baseline nutritional values is needed to ensure progress can be tracked without the need for historic product data.
- The time frame of achieving the target should be fully defined and the commitment should be SMART.
- The description of the products to which the commitment applies should be clear-cut and independent from company-internal information or definitions.

It is important to highlight that, overall, few companies had externally verifiable targets. This is because companies often define targets for specific categories, and definitions are not disclosed, therefore potentially limiting analysis of compliance at the product level. Boxes 8 and 9 (below) show companies' commitment across the nutrients of interest.

To what extent are companies disclosing compliance with their nutrient targets?

Companies have significant scope to improve their disclosure of compliance with specific targets. While nine companies have defined a saturated fat target, only four disclose the percentage of all relevant products (by number or volume) that met targets by FY 2019. Similarly, just four companies disclose the percentage of all relevant products that met sodium/salt targets.

Some companies show progress by defining new KPI's and disclosing progress through annual reports. In its *Sustainability Report, Goals & Progress 2019*, PepsiCo reports that, in 2019, 61% of its products did not exceed 1.3 milligrams of sodium per calorie; an increase from 58% in 2018. Unilever states that, in 2020, 77% of its portfolio enabled intakes of 5g per day of salt; although the company has not defined an externally verifiable target.

Most companies have made substantial progress on eliminating or limiting trans fats over the last decade. Seven out of the 12 companies that have defined a trans fat target disclose the percentage of all relevant products (by number or volume) that met the target by FY 2019. In its *Position on trans fat reduction*, Unilever states that 100% of its portfolio by volume has not contained TFAs originating from PHVO since September 2012. Ferrero, in its *Statement on Product Formulation and Innovation 2019*, indicates it has “stopped using partially hydrogenated fats in its products since 2006, and confirmed the adoption of manufacturing processes which avoid the use of partially hydrogenated fats.”

Despite these examples, more specific and updated reporting in alignment with the WHO goal of eliminating trans fats, and recommendation to limit industrially-produced trans fats to two percent of oils and fats in all foods, is required.

Danone, Nestlé, and PepsiCo are transparent about progress in their added sugar/calorie targets. PepsiCo aims for 67% or more of its beverage portfolio to contain less than 100 calories from added sugars per 12oz serving by 2021. The company's progress in FY 2019 was 47% up from 44% in 2018.

Are companies stepping up their investments to develop products aimed at fighting micronutrient deficiencies?

Nine companies provide evidence of investment in research or new technologies that enables the development or improvement of products aimed at addressing the specific needs of groups experiencing or at risk of malnutrition. Arla has established a public-private partnership in nutrition research – Arla Food for Health – to conduct studies of the health effects of dairy, dairy ingredients, and dairy's role in healthy diets. Among others, the company's 'MAGNUS' project examines how milk protein and whey permeate rescue linear and ponderal growth, as well as child development in moderate acute malnutrition. In Malawi, Ajinomoto has invested in research on the efficacy of ready-to-use therapeutic foods for children with severe acute malnutrition. ATNI also received evidence of a company doing studies focused on research to improve iron absorption to develop new products which can contribute to fighting micronutrient deficiencies in Africa and Asia.

Only FrieslandCampina and Nestlé publicly disclose a commentary on investments made in research or other business areas to develop products aimed at priority populations. FrieslandCampina initiated a nutrition survey among 18,000 children in South East Asia (SEANUTS), designed to provide insight into the nutritional status of children in Indonesia, Vietnam, Thailand, and Malaysia, and help the company develop appropriate products. Nestlé's efforts to fight undernutrition/micronutrient deficiencies focus on fortification and biofortification. In Nigeria, the company is using biofortified maize (vitamin A) in cereal products and participating in workshops and forums on biofortified crops. FrieslandCampina initiated a nutrition survey among 18,000 children in South East Asia (SEANUTS), designed to provide insight into the nutritional status of children in Indonesia, Vietnam, Thailand, and Malaysia, and help the company develop appropriate products. Nestlé's efforts to fight undernutrition/micronutrient deficiencies focus on fortification and biofortification. In Nigeria, the company is using biofortified maize (vitamin A) in cereal products and participating in workshops and forums on biofortified crops.

Examples of measures taken to improve food supply chain efficiency to reduce food loss/waste

Food and beverage companies can prevent and reduce food loss and waste (FLW) in parts of the food chain where they have significant impact and influence. Most companies showed examples of measures to improve food supply chain efficiency and reduce FLW either during processing, distribution or indirectly in the post-harvest, storage or consumption stages (as shown in Table 7 in Annex).

Are companies investing in products with smaller packaging sizes or serving sizes, aimed to improve consumer portion control?

Most companies (16 out of 25), provided examples of recent efforts to develop products with smaller packaging sizes or serving sizes, aimed to improve consumer portion control. While five companies showed evidence to ATNI on related research, Unilever and Mondelez were the only companies to provide research examples which include evidence of efficacy of portion control efforts on consumer behavior.

What evidence is there that companies are developing appropriate products for priority populations to tackle all forms of malnutrition, including micronutrient deficiencies?

Seventeen companies report that they developed products targeting specific groups by in the last three years. An overview is shown in Table 8 (in Annex).

Twelve companies provide examples of developing specific products in the last three years, aimed at children over five years old, as part of an approach to addressing the needs of priority populations. ATNI found the most examples for this age group, followed by the elderly, children between three and five years old, and women of childbearing age. It is essential that companies adopt strict nutrient criteria for all products and market them responsibly.

Recommendations Product formulation

Although most companies have defined relevant nutrient (re)formulation targets, companies can do much more to improve accountability on their commitments by:

- Disclosing the percentage of product portfolio that meets 'healthy' criteria on an annual basis.
- Supporting government-defined SMART targets for reducing nutrients of concern. Ideally companies should cover all relevant product categories and report progress over time at portfolio-level (g., disclose the overall proportion of products with reduced sodium).
- Setting SMART targets to improve the proportion of positive nutrients and ingredients in their products.
- Conducting and disclosing research on the efficacy of portion control strategies to support healthy diets.
- Improve R&D investments in nutrition. Newly developed products should target specific groups as identified by relevant public health authorities.
- Publish commentaries on investments made in research or other business to address malnutrition. Transparency is important to improve quality and impact of research, and critical if companies want consumers and regulators to trust their products.

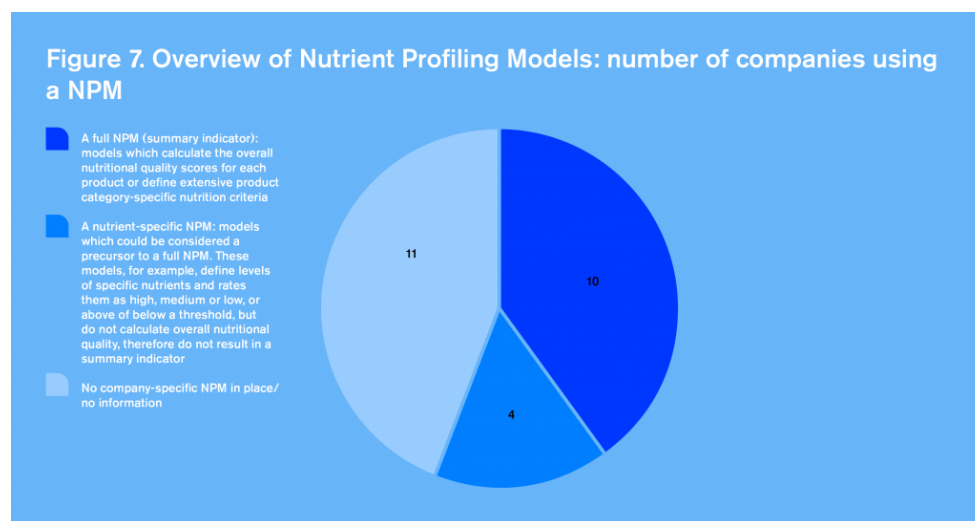
B3: Defining healthy and appropriate products

ATNI considers a full nutrient profiling model (NPM) those models which calculate the overall nutritional quality scores for each product or define extensive product category-specific nutrition criteria. ATNI also credits companies which use a nutrient-specific model, which could be considered a precursor to a full NPM. These models for example, define levels of specific nutrients and rates them as high, medium, or low, or above or below a threshold, but do not calculate overall nutritional quality, therefore do not result in a summary indicator.

What has changed in the Nutrient Profiling models that companies are using?

Fourteen companies are using some sort of NPM, compared to 13 in 2018. Since 2018, Kraft Heinz and Ajinomoto have adopted a new formal NPM, while in 2020, Kellogg adopted a full internal NPM (that calculates overall scores of the nutritional quality of its products including both positive and negative nutrients), and Grupo Bimbo published new guidelines adapted from a government-endorsed system. Unilever informed ATNI it is in the process of updating its NPM, primarily adding thresholds for positive nutrients.

Companies that have not yet adopted a NPM should be transparent on their efforts to improve the nutritional quality of their products. It is important to note that some companies which have not adopted a company specific NPM, do make reference to using other existing criteria to define 'healthy' products (e.g. FDA definition of 'healthy').



More companies are utilizing independent NPMs to evaluate the nutritional quality of their products. FrieslandCampina, for example, aligns criteria for trans-fat, saturated fat, added sugar, and sodium from Choices International, which was developed by independent scientists. Kellogg has started using an independent government-endorsed NPM, the Nutri-score, as a tool to (re)formulate products, and Nestlé has begun using the HSR to evaluate the nutritional quality of its portfolio, and is in the process of evolving its NPM to reflect the HSR.

Eight out of the fourteen companies that apply some sort of NPM cover all products and product categories, indicating there is still significant scope to ensure companies improve their offerings throughout their entire portfolios.

To what extent do companies commit to fortifying healthy products?

ATNI encourages companies to only fortify foods in accordance with relevant guidance (Codex/FAO) and select products or categories with underlying nutritional quality (e.g., meeting objective criteria, in addition to avoiding misleading consumers with claims which can make fortified products appear healthier options — see section on Labeling, chapter F).

Six companies (Danone, FrieslandCampina, Mondelez, PepsiCo, Arla, and Kellogg) commit to only fortify products of high underlying nutritional quality or meeting certain nutrition criteria — two more than 2018.

Two companies make an explicit commitment to only fortify products meeting nutrition criteria in its NPM. However, this information is not available in the public domain.

Danone is the only company to make an explicit and publicly available commitment. In its 2017 'Policy On Micronutrient Fortification', Danone includes the statement: "The product chosen for fortification must be of good underlying nutritional quality and compatible with a daily consumption. For this reason, only products belonging to Danone 'healthy categories (as listed in Danone Nutritional Targets)' are considered for fortification."

To what extent do companies align their fortification approaches to international guidance?

Nine companies were found to have a formal statement indicating their approach to fortification of products aimed at addressing undernutrition is based on international guidance on fortification (i.e. Codex CAC/GL 9-1987 and WHO/FAO Guidelines on Food Fortification with Micronutrients). In 2018 only four companies assessed did so. Only three companies – PepsiCo, Nestlé and Mondelez – were found to publicly disclose this approach. Generally, ATNI did not find evidence of companies committing to also use these international standards for their fortification approaches when and where local regulations do not exist.

As demand for products that allegedly would have immunity benefits has increased during the COVID-19 crisis, the availability of accurate and evidence-based nutrition information for all packaged foods, including those that are fortified, is increasingly important. Companies must ensure that fortified products which do not meet nutrition standards, avoid carrying health claims (more on this can be found in Category F, on labelling).

Methodology: Healthy multiplier results

In the Global Index 2021 methodology, a healthy multiplier is applied to any scores for commitment or performance indicators relating to 'healthy' products. The multiplier is derived from the company's score on 'Category B3: Defining healthy and affordable products', and ranges between 0.5 (adjusting the underlying score) and 1 (having no effect on the underlying score).

Unilever is the only company that achieves a score of 7.5 or more (out of 10) in criterion B3, and therefore the healthy multiplier is equal to 1. The table below shows that for other companies with less robust NPMs a healthy multiplier is applied impacting indicators in the methodology that refer to 'healthy' products.

Healthy multiplier	Number of companies	Company
1.0	1	Unilever
0.9	4	Danone, FrieslandCampina, Grupo Bimbo, Nestlé
0.8	8	Ajinomoto, Arla, General Mills, Kellogg, Mars, Mondelez, PepsiCo, Kraft Heinz
0.6	4	BRF, Campbell, Keurig Dr Pepper, Coca-Cola
0.5	8	Mengniu, Conagra, Ferrero, Lactalis, Yili, Meiji, Suntory and Tingyi

Recommendations B3

To improve and accelerate efforts to market nutritious products that support healthy diets, leading food and beverage manufacturers are encouraged to:

- Adopt an NPM (preferably a government-endorsed model) and utilize it to define which products are considered healthy. The NPM should cover all relevant product categories and assess both positive and negative food components.
- Validate internal NPM-based definition of healthy products with external standards (HSR ≥ 3.5 healthy threshold).
- Improve transparency on research and other investments used to develop products designed to help address malnutrition.
- Publish a fortification policy and commit to only fortifying products of high underlying nutritional quality (i.e. products that meet objective nutrition criteria, for example as in the company's NPM). For fortification of foods and beverages, companies should align at minimum with relevant Codex Alimentarius standards (*General Principles for the Addition of Essential Nutrients to Foods*) and/or WHO/FAO (*Guidelines on Food Fortification with Micronutrients*) guidance.

Annex

Table 1. Product categories included in ATNI's 2021 Product Profile based on Euromonitor subsets

Foods	Beverages
Baked Goods	Asian Specialty Drinks
Breakfast Cereals	Bottled Water - Other
Confectionery	Bottled Water - Pure
Dairy	Carbonates
Edible Oils	Concentrates
Ice Cream and Frozen Desserts	Energy Drinks
Processed Fruit and Vegetables	Juice
Processed Meat and Seafood	Other Hot Drinks
Ready Meals	RTD Coffee
Rice, Pasta and Noodles	RTD Tea
Sauces, Dressings and Condiments	Sports Drinks
Savoury Snacks	
Soup	
Sweet Biscuits, Snack Bars and Fruit Snacks	
Sweet Spreads	

Note: In 2018 Global Index, one category for Bottled Water was included in analysis. For this iteration, ATNI has divided the category into two: Bottled Water - Other and Bottled Water - Pure
 RTD = Ready To Drink

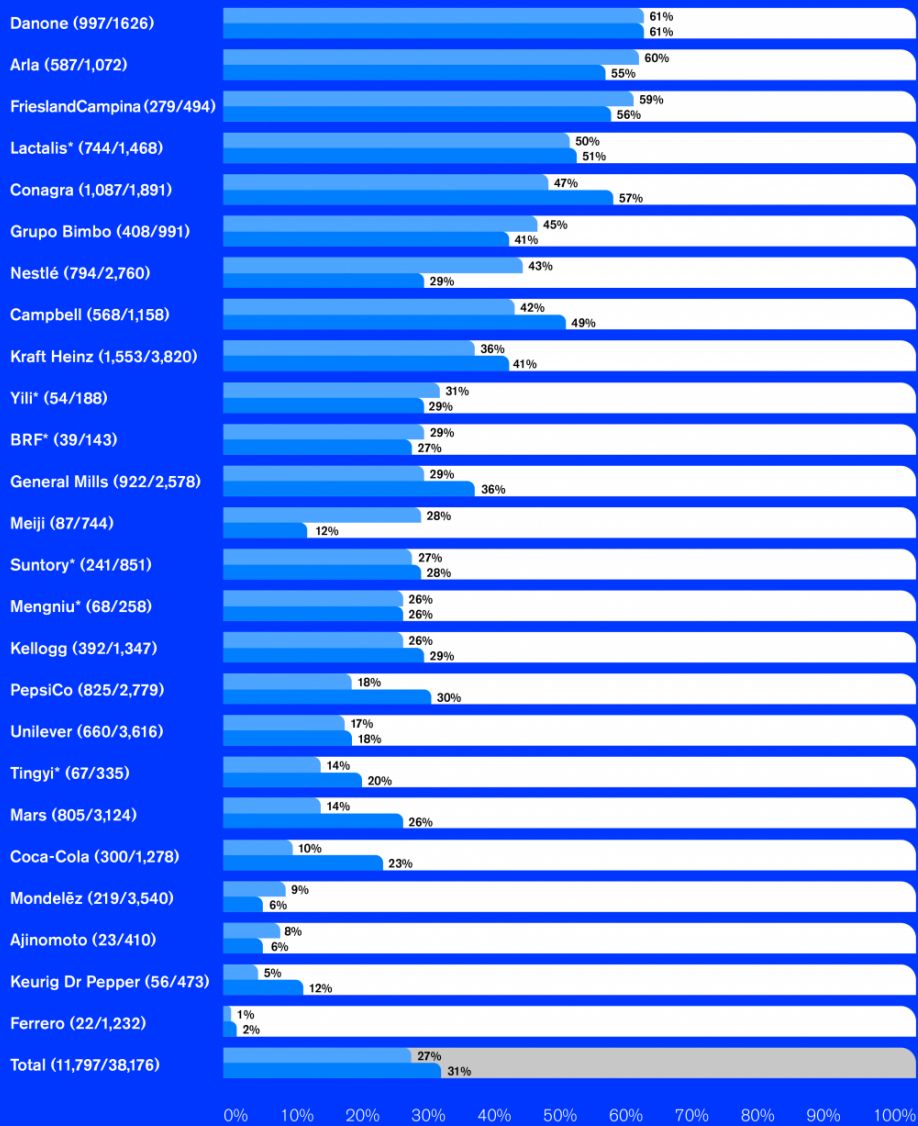
Table 2. Product Profile, number of countries, product categories and estimated global sales coverage by company

	Countries	Total no. countries	Categories	Total no. of products included in the assessment	Global retail sales represented within countries and categories selected (%)
Ajinomoto	Brazil, Japan, Thailand, USA	4	1. Concentrates; 2. Processed Meat and Seafood; 3. Ready Meals; 4. Rice, Pasta and Noodles; 5. RTD Coffee; 6. Sauces, Dressings and Condiments; 7. Soup	410	75-80
Arla	Australia, Canada, Denmark, Germany, Hong Kong, Russia, Sweden, United Kingdom, USA, Finland	10	1. Dairy; 2. Sauces, Dressings, and Condiments; 3. Soup	1,072	80-85
BRF*	Brazil	1	1. Dairy; 2. Ice Cream and Frozen Desserts; 3. Processed Fruit and Vegetables; 4. Processed Meat and Seafood; 5. Ready Meals	143	90-95
Campbell	USA, Canada, Mexico	3	1. Baked Goods; 2. Juice; 3. Sauces, Dressings, and Condiments; 4. Savoury Snacks; 5. Soup	1,158	75-80
Coca-Cola	Australia, China, Hong Kong, India, Japan, Mexico, New Zealand, South Africa, United Kingdom, USA	10	1. Asian Specialty Drinks; 2. Bottled Water (other); 3. Bottled Water (pure); 4. Carbonates, Concentrates; 5. Dairy; 6. Juice; 7. RTD Coffee; 8. RTD Tea; 9. Sports Drinks	1,278	50-55
Conagra	Hong Kong, India, New Zealand, Mexico, USA	5	1. Breakfast Cereals; 2. Dairy; 3. Edible Oils; 4. Other Hot Drinks; 5. Processed Fruit and Vegetables; 6. Processed Meat and Seafood; 7. Ready Meals; 8. Sauces, Dressings, and Condiments; 9. Savoury Snacks; 10. Sweet Spreads	1,891	75-80
Danone	Australia, Brazil, China, France, Hong Kong, Mexico, Russia, South Africa, United Kingdom, USA	10	1. Bottled Water (other); 2. Bottled Water (pure); 3. Dairy; 4. RTD Coffee	1,626	55-60
Ferrero	Australia, China, Germany, Hong Kong, India, Italy, Mexico, New Zealand, United Kingdom, USA	10	1. Baked Goods; 2. Confectionery; 3. Dairy; 4. Sweet Biscuits, Snack Bars and Fruit Snacks; 5. Sweet Spreads	1,232	55-60
Friesland-Campina	Germany, Hong Kong, Indonesia, Netherlands, Nigeria, Philippines, Russia, Thailand, United Kingdom, Vietnam	10	1. Dairy; 2. Other Hot Drinks; 3. Processed Meat and Seafood	494	65-70
General Mills	Australia, Canada, China, Hong Kong, India, Mexico, New Zealand, South Africa, United Kingdom, USA	10	1. Breakfast Cereals; 2. Baked Goods; 3. Dairy; 4. Ice Cream and Frozen Desserts; 5. Ready Meals; 6. Rice, Pasta, and Noodles; 7. Sauces, Dressings and Condiments; 8. Soup; 9. Sweet Biscuits, Snack Bars and Fruit Snacks; 10. Sweet Spreads	2,578	65-70
Grupo Bimbo	Brazil, Canada, China, Mexico, United Kingdom, USA	6	1. Baked Goods; 2. Confectionery; 3. Savoury Snacks; 4. Sweet Biscuits, Snack Bars and Fruit Snacks	911	80-85
Keurig Dr Pepper	Hong Kong, Mexico, USA	3	1. Bottled Water (pure); 2. Bottled Water (other); 3. Carbonates; 4. Juice; 5. Processed Fruit and Vegetables; 6. RTD Tea	473	90-95
Kellogg	Australia, Canada, China, Hong Kong, India, Mexico, New Zealand, South Africa, United Kingdom, USA	10	1. Baked Goods; 2. Breakfast Cereals; 3. Processed Meat and Seafood; 4. Savoury Snacks; 5. Sweet Biscuits, Snack Bars, and Fruit Snacks	1,347	70-75
Kraft Heinz	Australia, Canada, China, Hong Kong, India, Mexico, New Zealand, United Kingdom, USA	9	1. Baked Goods; 2. Concentrates; 3. Dairy; 4. Juice; 5. Processed Fruit and Vegetables; 6. Ready Meals; 7. Sauces, Dressings and Condiments; 8. Savoury Snacks; 9. Soup; Sweet Spreads	3,820	70-75
Lactalis*	Australia, Brazil, Canada, China, France, India, Mexico, South Africa, United Kingdom, USA	10	1. Dairy; 2. Juice; 3. RTD Coffee; 4. Sauces, Dressings, and Condiments	1,468	55-60
Mars	Australia, China, Hong Kong, India, Mexico, New Zealand, Russia, South Africa, United Kingdom, USA	10	1. Confectionery; 2. Dairy; 3. Ice Cream and Frozen Desserts; 4. Ready Meals; 5. Rice, Pasta, and Noodles; 6. Sauces, Dressings, and Condiments; 7. Savoury Snacks; 8. Soup	3,124	65-70
Meiji	China, Hong Kong, Japan	3	1. Confectionery; 2. Dairy; 3. Ice Cream and Frozen Desserts; 4. Ready Meals; 5. Sweet Biscuits, Snack Bars and Fruit Snacks	744	90-95
Mengniu*	China; Hong Kong	2	1. Breakfast cereals; 2. Dairy; 3. Ice Cream and Frozen Desserts; 4. Other Hot Drinks	258	95-100
Mondelēz	Australia, Brazil, China, Hong Kong, India, Mexico, New Zealand, South Africa, United Kingdom, USA	10	1. Baked Goods; 2. Concentrates; 3. Confectionery; 4. Dairy; 5. Other Hot Drinks; 6. Savoury Snacks; 7. Sweet Biscuits, Snack Bars and Fruit Snacks	3,540	50-55
Nestlé	Australia, Brazil, China, France, Hong Kong, India, Mexico, South Africa, United Kingdom, USA	10	1. Bottled Water (pure); 2. Bottled Water (other); 3. Breakfast Cereals; 4. Carbonates; 5. Concentrates; 6. Confectionery; 7. Dairy; 8. Other Hot Drinks; 9. Processed Meat and Seafood; 10. Ready Meals; 11. Rice, Pasta and Noodles; 12. RTD Coffee; 13. Sauces, Dressings and Condiments; 14. Soup; 15. Sweet Biscuits, Snack Bars and Fruit Snacks	2,760	45-50
PepsiCo	Australia, China, Hong Kong, India, New Zealand, Russia, Mexico, South Africa, United Kingdom, USA	10	1. Bottled Water (other); 2. Bottled Water (pure); 3. Breakfast Cereals; 4. Carbonates; 5. Concentrates; 6. Dairy; 7. Energy Drinks; 8. Juice; 9. Sauces, Dressings and Condiments; 10. Savoury Snacks; 11. Sports Drinks; 12. Sweet Biscuits, Snack Bars and Fruit Snacks	2,779	60-65
Suntory*	Australia, China, France, Germany, Hong Kong, Japan, New Zealand, South Africa, United Kingdom	9	1. Baked Goods; 2. Bottled Water (other); 3. Bottled Water (pure); 4. Carbonates; 5. Concentrates; 6. Dairy; 7. Energy Drinks; 8. Juice; 9. RTD Coffee; 10. RTD Tea; 11. Sports Drinks	851	80-85
Tingyi*	China	1	1. Bottled Water (pure); 2. Dairy; 3. Juice; 4. Rice, Pasta and Noodles; 5. RTD Tea	335	95-100
Unilever	Australia, Brazil, India, China, France, Germany, Mexico, South Africa, United Kingdom, USA	10	1. Concentrates; 2. Ice Cream and Frozen Desserts; 3. Other Hot Drinks; 4. Processed Meat and Seafood; 5. Ready Meals; 6. Rice, Pasta and Noodles; 7. RTD Tea; 8. Sauces, Dressings and Condiments; 9. Soup; 10. Sweet Spreads	3,616	50-55
Yili*	China; Hong Kong	2	1. Dairy; 2. Ice Cream and Frozen Desserts	3,616	95-100
Total		25		38,176	60-65%

* Company did not provide information to ATNI

RTD = ready to drink *Data derived from Euromonitor International's 2021 industry publications of: Packaged Food, Hot Drinks and Soft Drinks.

Figure 4. Healthiness of product portfolios and sales of Global Index companies



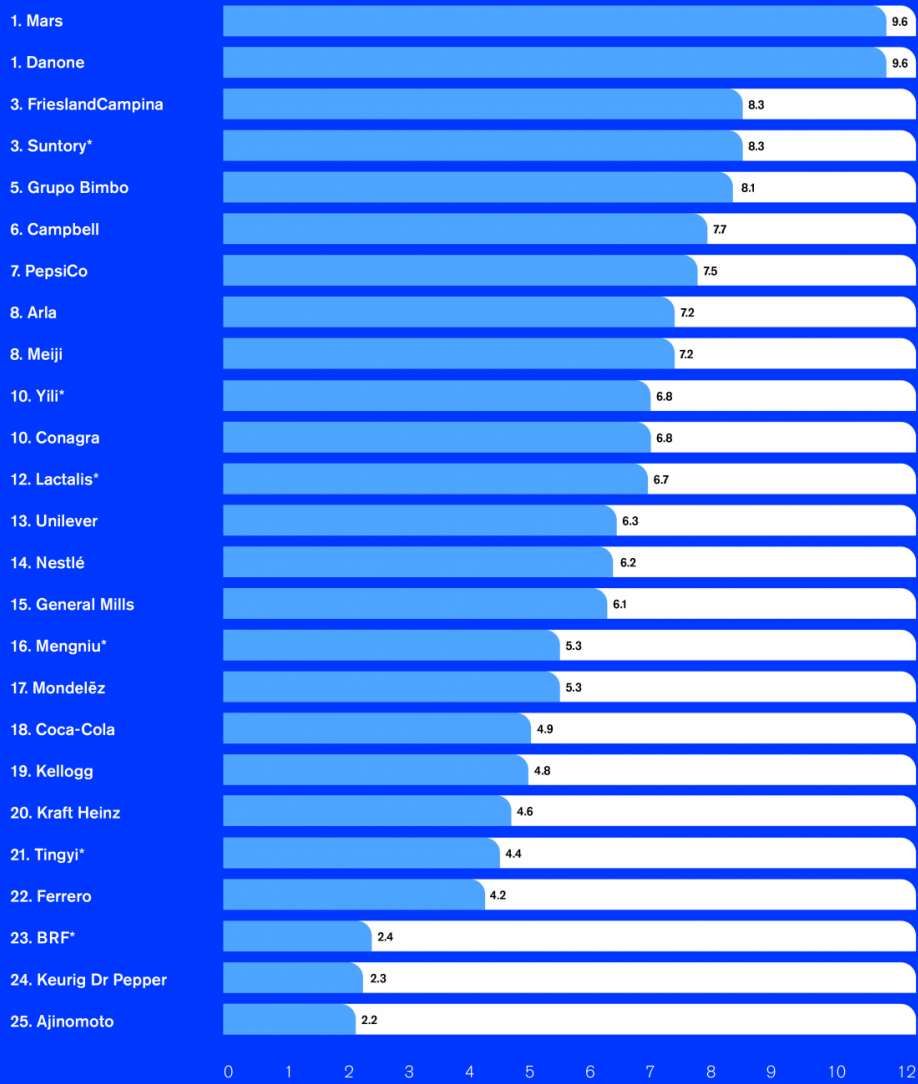
% healthy sales (HSR >= 3.5)

% healthy products (HSR >= 3.5)

Note: Parentheses after company name denote the number of products that met the healthy threshold of HSR >= 3.5 out of the total number of products assessed for the company. E.g., for Danone, 997 of the 1,626 products assessed met the healthy threshold.

* Company did not provide information to ATNI

Figure 6. Within product category performance scores and ranking



Note: A total of 24 product categories were identified in ATNI's Product Profile data in which two or more companies are active. Within-category ranks are calculated for all product categories, and mean scores are sales-weighted by product categories to calculate companies scores. Maximum possible score is 10. * Company did not provide information to ATNI

Table 3. Within category comparisons of mean HSR

	Asian Specialty Drinks	Bottled Water - Other	Bottled Water - Pure	Baked Goods	Breakfast Cereals	Carbonates	Concentrates	Confectionery	Dairy	Edible Oils	Energy Drinks	Ice Cream and Frozen Desserts	Juice	Other Hot Drinks	Processed Fruit and Vegetables	Processed Meat and Seafood	Ready Meals	Rice, Pasta and Noodles	RTD Coffee	RTD Tea	Sauces, Dressings and Condiments	Savoury Snacks	Soup	Sports Drinks	Sweet Biscuits, Snack Bars and Fruit Snacks	Sweet Spreads
Ajinomoto						0.5									2.2	2.6	0.5	2.6		0.9		0.9				
Arla								3.2												2.6		3.1				
BRF*								2.7			1.8				5.0	1.8	2.8									
Campbell				3.2								3.3								3.2	2.5	3.3				
Coca-Cola	1.5	2.1	5.0		1.5	1.5	3.6	1.0	2.7									1.3	1.8				1.7			
Conagra					3.7					4.3			0.5	4.0	2.5	3.3				2.6	2.5					4.2
Danone		2.1	5.0					3.5										3.9								
Ferrero				1.1			0.9	0.7											1.5						1.2	0.8
FrieslandCampina								3.4					1.5		3.8											
General Mills				1.5	3.1		3.5		1.8						2.6	3.7				3.5	3.5		2.4	1.2		
Grupo Bimbo				3.0			1.2															2.1		1.5		
Keurig Dr Pepper	2.0	5.0			1.3							2.1	3.3					1.6								
Kellogg				2.9	3.2										3.9							1.7		2.3		
Kraft Heinz				2.6		1.1	2.7		3.6	4.2	2.5	2.8							2.2	3.5	3.6				2.5	
Lactalis*							3.1		4.3								4.1	2.6								
Mars						1.3	2.8	1.5							3.4	3.5			2.8	0.7	1.9					
Meiji						0.9	3.2	2.2							2.9										0.8	
Mengniu*						3.0	2.3																			
Mondeléz				1.2		0.5	1.1	2.4					0.7									2.2		1.4		
Nestlé	2.0	5.0	3.1	1.8	1.5	0.8	2.4					2.7	4.1	3.2	2.7	1.6	1.5	1.5	0.8					2.3		
PepsiCo	2.0	5.0	3.9	1.6	1.5	3.1	1.1	2.6											3.6	2.5		1.6	2.3			
Suntory*	2.0	5.0	0.5	1.6	1.5	3.0	1.1	3.5									2.8	2.1					1.9			
Tingyi*			5.0				2.7		3.6								0.6	1.5								
Unilever			1.8	3.8					2.1	1.6	4.1	3.2	3.2	1.8	1.9	2.7									2.5	
Yili*							3.1	2.1																		
Mean HSR	1.5	2.0	5.0	2.0	3.5	1.6	1.2	1.0	2.9	4.3	1.1	2.0	3.2	1.4	4.1	3.1	3.0	2.4	2.7	1.7	2.5	2.2	2.5	1.7	1.8	2.2

* Company did not provide information to ATNI

Table 5. Overview of differences between company-estimated percentages of healthy products and the results of the ATNI Product Profile assessment

	Company statement	Company-estimated (% healthy)	ATNI Product Profile HSR \geq 3.5 (% sales healthy)	% Difference	ATNI Product Profile coverage (% of global sales)	Source
Arla	In 2019, 90% of the Arla® branded products in the milk, yogurt and everyday cheeses categories comply with the criteria	90	60	-33%	80-90	2019 Corporate Responsibility Report
Campbell	Sales from Healthy Products in total portfolio 18% in FY 2019	18	42	133%	70-80	2020 Corporate Responsibility Report
Danone	90% of volumes sold in 2019 are in healthy categories. Plant-based products are not yet included. Performance indicator verified by PwC	90	61	-32%	50-60	Nutrition achievements 2019
General Mills	In FY 2019, 45% of General Mills' global volume met the company's internal criteria	45	29	-36%	60-70	Global Health Reporting
FrieslandCampina	70% of the total volume of consumer products sold that complies with the FrieslandCampina Global Nutritional Standards in 2019	70	59	-16%	70-80	Annual Report 2019
Nestlé	80.5% of products meet or exceeded Nestlé Nutritional Foundation profiling criteria (as % of total sales)	80,5	43	-47%	40-50	Creating Shared Value 2019 Report
Kraft Heinz	In 2018, Kraft Heinz expanded their nutrition guidelines globally. They surpassed their commitment four years early at 76% compliance globally, as of 2019	76	41	-46%	70-80	2020 ESG Report
Unilever	By 2020, 61% of Unilever's portfolio complied with their WHO-aligned nutritional standards	61	17	-72%	50-60	Positive nutrition, strategy and goals website

Note: In addition to disclosing the proportion of products that meet internal criteria, some companies might also disclose the proportion of products that are considered healthy according to external standards. Up to 2019/2020, results are reported in alignment with the Global Index research phase.

Table 7. Examples of measures to taken to prevent food loss and waste

	During processing / manufacturing	During distribution	Indirectly**
Ajinomoto	•	•	•
Arla	•	•	•
BRF*	•	•	•
Campbell	•	•	•
Coca-Cola			•
Conagra	•		
Danone	•	•	•
Ferrero	•		
FrieslandCampina	•	•	•
General Mills	•		
Grupo Bimbo	•	•	
Keurig Dr Pepper			
Kellogg	•		•
Kraft Heinz	•		
Lactalis*			
Mars	•		•
Meiji		•	
Mengniu*			
Mondelēz	•		•
Nestlé	•	•	•
PepsiCo	•		•
Suntory*	•		
Tingyi*			
Unilever	•		•
Yili*			

* Company did not provide information to ATNI

** Indirectly refers to other examples during states of agricultural production, post-harvest handling and storage, and consumption.

Table 8. Overview of companies' new products targeting specific groups

	Ajinomoto	Arla	Campbell	Coca-Cola	Conagra	Danone	Friesland-Campina	Grupo Bimbo	Kellogg	Mars	Meiji	Mengniu*	Mondelēz	Nestlé	PeppCo	Unilever	Yili*
Women of child-bearing age		•				•	•		•		•		•			•	
Children between 6–36 months (complementary foods only)						•	•							•			
Children between 3–5 years		•				•	•						•	•		•	•
Children over 5 years	•			•	•	•	•		•	•	•		•	•		•	•
Elderly	•		•				•				•	•		•			•
Other population groups						•	•	•						•	•	•	

Note: Blank indicates no products developed/no information.
 * Company did not provide information to ATNI



Category C: Accessibility

Delivering affordable, accessible products

The Global Index 2021 assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories. The results of Category C, which carries 15% of the weight of the overall score, are presented here.

Producing healthier options is necessary, but an insufficient measure on its own to improve consumers' access to nutritious foods and beverages and drive up their consumption. Therefore, companies must offer them at competitive prices and distribute them widely to reach all consumers in need, especially those who are experiencing and/or are vulnerable to malnutrition. This category assesses companies' efforts to make their healthy products more affordable and accessible to all consumers (including priority populations), globally, through their approaches to pricing and distribution.

Category C consists of two criteria:

- C1 Product Pricing
- C2 Product Distribution

To perform well in this category, a company should:

- Make clear, formalized public commitments that extend into an action plan to promote accessibility and affordability of healthy products over less healthy products, including those that are specifically designed to address micronutrient deficiencies in groups experiencing or at high-risk of malnutrition ([priority populations](#)). Specifically, adopt and publish formal policies and strategies incorporating these elements and demonstrate a clear focus on low-income consumers and consumers that lack regular access due to geographical factors (e.g., living in rural areas, poor urban locations, etc.).
- Set objective, measurable targets to improve the affordability and physical accessibility of all healthy products in all markets, and publicly disclose them. For example, define targets on price points on healthy products for low-income consumers, or target number of consumers to reach with healthy products through improved distribution in remote locations.
- Provide evidence of doing pricing and distribution analysis to appropriately price and distribute healthy products, in all their active markets.
- Take actions to improve the affordability and physical accessibility of healthy products including those specifically designed for priority populations, by providing examples of initiatives that have improved pricing and distribution of healthy products to all consumers, especially those with low-income and constrained by geographical factors.

Ranking on Accessibility

C1 Product pricing **C2** Product distribution

* Did not provide information to ATNI

FrieslandCampina and Nestlé rank first and second in Category C respectively, with the most comprehensive pricing and distribution approach for their 'healthy' products, including those products that are designed to address micronutrient deficiencies in groups experiencing and at high-risk of malnutrition. They are followed by Danone (third) and Unilever (fourth). Companies that show improvement in their scores are FrieslandCampina, Coca-Cola, Meiji, Mars, and Unilever. FrieslandCampina shows the greatest improvement in score (5.2 to 7.7), followed by Meiji (0.6 to 1.7).

Category Context

In this Category, ATNI assesses the food and beverage manufactures on their commitments, practices, and transparency to improve their pricing and distribution efforts and increase access to nutritious food.

Access to affordable, nutritious food is especially important in the context of the Covid-19 pandemic. 150 million more people will fall below the extreme poverty line due to Covid-19, with drastic impacts on food security and access to nutrient-rich foods. Worldwide, food insecurity has increased as global food prices rose almost 20% between January 2020 and 2021. Many countries, especially low- and middle-income countries, have experienced high food price inflation at retail-level and face constant supply-chain disruptions due to the pandemic. In the middle of the Covid19 crisis in 2020, the Food and Agriculture Organization of the United Nations (FAO) estimated that more than three billion people could not afford a healthy diet. Their research also highlighted that higher cost and unaffordability of healthy diets is associated with increased food insecurity and different forms of malnutrition, including child stunting and adult obesity. Due to the Covid-19 epidemic, this problem is likely to exacerbate.

Access to healthy food is further hindered by inequities that affect everyday food environments, and Covid-19 has disproportionately affected poorer and marginalized populations globally. Reducing food costs and successfully making context interventions that transform food purchase and supply are therefore essential to improve the livelihoods of many, in all markets – including higher-income, as well as medium- and lower- income countries.

Relevant changes in methodology

Some adjustments have been made since the previous iteration of the Global Index. For Category C, these include:

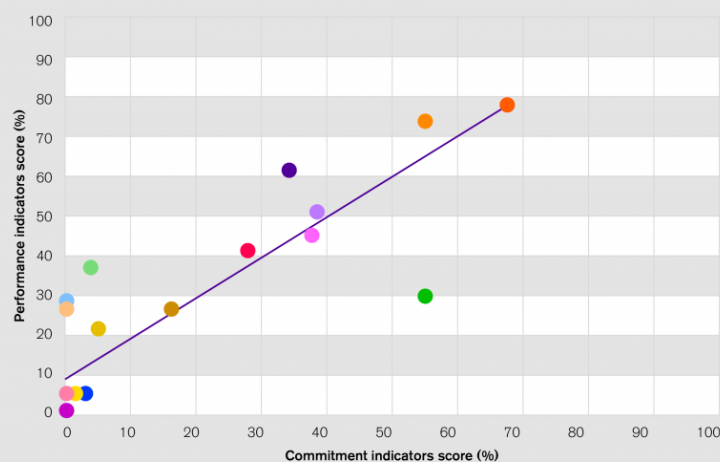
- In 2018, Category C had a weight of 20% of the overall Index score. It now accounts for 15% of the Index score. This adjustment is partially because of the integration of the [Product Profile](#) scores in the current Global Index ranking algorithm.
- In addition to nutrition indicators, the previous Global Index iteration included a set of undernutrition indicators. These assessed company commitments and actions to prevent and address undernutrition and micronutrient deficiencies among at-risk populations in low-income countries. In the current methodology, the commitment of companies to specifically address the needs and key nutritional priorities of specific population groups at risk of malnutrition is assessed for low-, middle-, and high-income countries alike. As a result, all companies are assessed on their efforts to reach these priority populations.
- For this Index, the assessment of physical accessibility of healthy products encompasses companies' actions to address lack of geographical access to healthy products (e.g., rural groups, living in “”).
- ATNI credits companies according to the quality and strength of their commitments. The 2021 iteration makes this more stringent by crediting only those commitments that are publicly disclosed.
- In addition to assessing companies' pricing and distribution efforts for products that are considered 'healthy', this Category now also assesses healthy products that are specifically designed to address undernutrition and micronutrient deficiencies in priority populations (e.g., fortified products that meet company's-own/externally defined healthy nutrition criteria).
- The 2021 Index gives less credit to companies' philanthropic efforts to improve accessibility, for example, product donation programs. This Index encourages companies to improve access with their commercial strategies. For example, offering discounts and price promotions on healthy products aimed at low-income groups, and examples of arrangements for prominent shelf positions for healthier, affordable products in retail outlets catering to groups at risk.

More details about the changes in the methodology can be found in the [methodology section](#) of this Index.

Key findings

- The average Category C score decreased by 0.6 points from 2.5 to 1.9 since the 2018 Global Index. So, the score for this category remains low, with companies performing better in accessibility (accounting for geographical access and distribution of healthy products) than affordability (accounting for healthy products' pricing).
- FrieslandCampina ranks first moving up from the fifth rank in 2018. This improvement can be attributed to the company's updated 'Broadening Access to Nutrition' program that includes formal commitments, a concrete strategy, and measurable targets to improve the affordability and physical accessibility of its healthy products. In addition, these commitments and actions extend to products that aim to address micronutrient deficiencies in groups experiencing, or at high-risk of, malnutrition (priority populations).
- Overall, there is limited evidence of commitments, actions and disclosure from most companies linked to accessibility and affordability. Twelve out of 25 companies do not show any high-level public commitments on affordability and accessibility, compared to 10 out of 22 in the 2018 Global Index. Most low-scoring companies assessed in this Index made broad and stand-alone commitments that are not part of a comprehensive policy. At times, these companies demonstrate ad-hoc actions in some markets and/or for some products only. This trend is similar to the one observed in 2018, where companies performed poorly in the absence of robust commitments on affordability and accessibility. Thus, a stronger, company-wide commitment is necessary to increase impact at the performance-level (see Figure 2).
- Only seven companies were found to have clear strategies for improving the affordability of healthy products specifically designed to combat micronutrient deficiencies in priority populations, while eight were found to have the same for improving accessibility. Although more companies have provided examples of improving accessibility and affordability of such products, these efforts are limited to some low- and middle-income countries, and not across all markets the companies are active in.
- Despite the need for more action to improve the affordability and accessibility of healthy products, especially as the COVID-19 pandemic has further threatened access to nutritious foods, companies' practices show limited progress in this area. Six companies have shared examples of improving the accessibility of their healthy products with better distribution practices (four more than in 2018). And only six companies have provided examples of improving affordability of their healthier options by offering promotions and discounts on their healthy products (four less than in 2018).

Figure 2. Correlation between company commitment and performance scores related to the accessibility and affordability of healthy products



General recommendations

To improve commitments, strategies, and actions on affordability and accessibility, ATNI encourages food and beverage manufacturers to:

- Clearly define their healthy products based on objective nutrition criteria that align with national and international standards.
- Develop a policy with strong, company-wide, public commitments that translate into clear action plans to address affordability and accessibility of healthy products, including products specifically designed to address micronutrient deficiencies. The policy should specifically address the needs of priority populations at risk of malnutrition and consumers with low-income and/or those that lack physical access to nutritious food across all markets.
- Set concrete, SMART and targets to reach consumers with healthy products across all markets it is active in to encourage more purchases of healthier products rather than less healthy products over time.
- Conduct periodic/regular country-level pricing and distribution analysis to identify and address the unmet needs of consumers with low incomes and based in remote, inaccessible locations.
- Provide and disclose evidence of actions undertaken to improve the pricing and distribution of healthy products, as well as products designed to address micronutrient deficiencies, and report on progress made.

Noteworthy changes and best practices



FrieslandCampina has enhanced its commitments, strategies, and practices by effectively adopting a policy on affordability and accessibility called 'Broadening Access to Nutrition'. Its concrete, measurable targets linked to this program stand out. One of its objectives is to increase the share of affordable nutrition products in its lower-income markets (Nigeria, Pakistan, Ivory Coast, Indonesia, Vietnam, and the Philippines) to at least 15 % of sold volume in 2025. Additionally, it aims to increase the percentage of affordable nutrition products that complies with its own nutrition criteria, Affordable Nutritional Standards, in these markets to at least 50 % in 2025. In its efforts to improve the accessibility of its affordable healthy products, the company has conducted robust pricing and distribution analysis, and shares examples of arrangements made with distributors regarding how healthy products are made accessible in several low- and middle-income countries.



Nestlé has developed and updated its commercial strategy, known as Popularly Positioned Products (PPP), to address the affordability of products meeting its own nutrition criteria, including those aimed at addressing micronutrient deficiencies across all its market operations. To appropriately price healthy products whilst considering the needs of low-income consumers, the company has an Integrated Commercial Planning process in place. This aims to review pricing of Nestlé's healthy products falling within the scope of its Popularly Positioned Products strategy, globally. The company also demonstrated examples of its application in various markets. In terms of distribution, the company shares evidence from Bangladesh through which it reaches "deep rural marginal outlets" to ensure the availability and accessibility of healthy Nestlé products to rural consumers. Its focus on priority populations is substantiated with examples of various products designed to address micronutrient deficiencies (e.g., the Bear Brand in South-East Asia).



Unilever discloses commitments that consider the needs of low-income consumers and those with limited geographical access and tries to reach priority populations in low- and middle-income countries with healthy products specifically designed for them. Since the 2018 Index, the company has expanded its accessibility strategy in rural areas by introducing its renowned Shakti Project model in 10 more countries, including Ethiopia, Sri Lanka, Pakistan, Colombia, and Egypt. The company has adopted a strategy to improve the price points of its products.





Since 2018, Meiji has expanded its free Home Delivery Service in Japan that offers a range of dairy products, vitamin-rich fruit and vegetable juices, and other products with healthy ingredients. The service is used by 2.5 million households in Japan via 3,000 local distributors and is now also offered by its subsidiary in Thailand.



C1 Product Pricing

To what extent have companies enhanced their commitments and strategies for improving the affordability of their healthy products, including products that intend to address micronutrient deficiencies in priority populations (e.g., healthy fortified products)?

Companies assessed on this Index achieve an average score of 1.8 in the area of affordability. FrieslandCampina achieves the highest score of 8.2 in this Criterion, an improvement from 5.4 in the previous iteration, by integrating accessible and affordable nutrition as a key driver of its revised 'Broadening Access to Nutrition' program; a significant component of the company's business strategy (see Best Practices). Nestlé (7.6) and Danone (5.4) follow in second and third place, respectively.

Table 1 (below) shows that 12 out of 25 companies make public commitments to improve the affordability of their healthy products. Among them, eight extend their commitments to all their business operations. Mars has shown improvement by committing to offer affordable, nutritious products with its Mars Edge segment in India. Arla, FrieslandCampina and Nestlé make clear, company-wide commitments explaining how they will ensure affordability of their healthy products, whilst referring to the needs of low-income groups in all the markets they operate in. Danone also makes such a commitment, but without explicitly referring to low-income groups in its public statement. General Mills, Grupo Bimbo, PepsiCo, and Unilever refer to low-income groups, although in commitments that have not been formalized or lack explicit focus on healthy products.

Five companies – Arla, FrieslandCampina, Grupo Bimbo, Nestlé, and Unilever – express concrete commitments to improve the affordability of healthy products designed to address micronutrient deficiencies in priority populations. Especially noteworthy are commitments made by Arla and FrieslandCampina

Danone, FrieslandCampina, Grupo Bimbo, Nestlé, PepsiCo, and Unilever strengthened their commitments with strategies that aim to improve the affordability of healthy products as shown in Table 1. FrieslandCampina stood out as the only company with objective, measurable targets linked to its 'Broadening Access to Nutrition' program for improving pricing and distribution of its healthy products (see Best Practices). Danone monitors in its Danone Way reporting the reach of lower-income groups with its healthy products. Besides, Danone is defining concrete targets for 2030. Nestlé has 'PPP-Affordable Nutrition Guidelines' which formally set out its new strategy and is particularly focused on improving affordability in emerging markets.

Arla, FrieslandCampina, Grupo Bimbo, Kellogg's, Nestlé, PepsiCo, and Unilever draw specific attention to priority populations in their commercial affordability strategies for healthy products addressing micronutrient deficiencies. Nestlé includes fortification of its healthy products in its 'PPP' strategy to help address micronutrient deficiencies. To accelerate efforts in this area, the company's R&D Center in Abidjan, Cote d'Ivoire, has been assigned to lead innovations, develop solutions for specific product categories, identify nutritious raw materials, and support agronomy research. The company states that 87 percent of its popularly positioned products for lower-income consumers were fortified with at least one micronutrient.

For Nigeria and Bangladesh, Arla had aimed to "increase market penetration by 2% in 2020, reaching 71.4 million lower income consumers." Arla's approach in Bangladesh is focused on increasing market penetration of fortified 'filled-milk powder' supplied under its Pushti Ambassadors program. The program employs rural women as female micro-entrepreneurs also known as 'Pushti workers', who supply fortified milk powder at affordable prices to low-income families in remote regions of Bangladesh, who have children at high-risk of undernutrition.

Table 1. Overview of companies' commitments, strategy and actions to improve the affordability of healthy products

	Company has public commitments for healthy products	Company makes reference to low-income groups	Company has strategy and/or targets in place	Company provides evidence of offering discounts, price promotions or coupons for healthy products	Company provides evidence of improving affordability of healthy products that address micronutrient deficiencies in priority populations
Ajinomoto	▲			Yes, without attention to low-income groups	✓
Arla	●	★			✓
BRF*					
Campbell	▲				
Coca-Cola					✓
Conagra					
Danone	●		■	Yes, without attention to low-income groups	✓
Ferrero					
FrieslandCampina	●	★	■	Yes, without attention to low-income groups	✓
General Mills	▲	★			
Grupo Bimbo	▲	★	■	Yes, without attention to low-income groups	✓
Keurig Dr Pepper				Yes, without attention to low-income groups	
Kellogg	▲				✓
Kraft Heinz					
Lactalis*					
Mars	▲				✓
Meiji					
Mengniu*					
Mondelēz					
Nestlé	●	★	■	Yes, without attention to low-income groups	✓
PepsiCo	▲	★	■		✓
Suntory*					
Tingyi*					
Unilever	▲	★	■		✓
Yili*					

● Clear commitment made for whole business;
 ▲ Broad, stand-alone commitment;
 ★ Makes reference to low-income groups;
 ■ Has a strategy/target for healthy products (note: this excludes strategies/targets for products aimed at addressing micronutrient deficiencies)
 ✓ Yes
 * Company did not provide information to ATNI

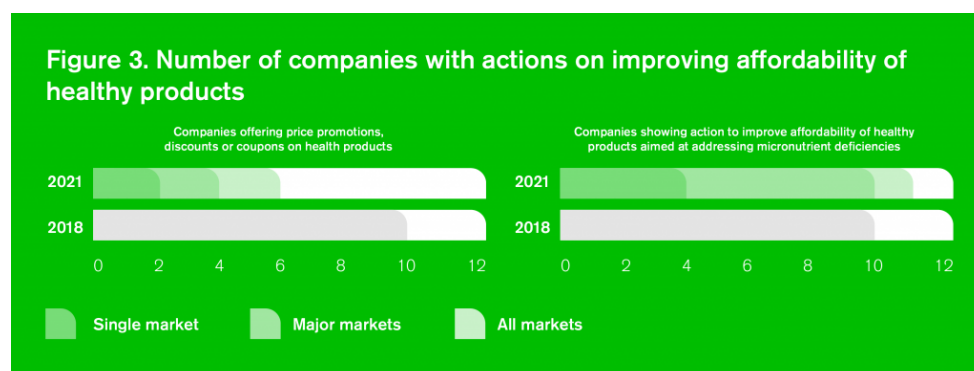
Is there evidence that companies have done analysis and increased their efforts to improve the affordability of their healthy products, including products aimed at addressing micronutrient deficiencies in priority populations?

Pricing analysis refers to research focused on determining what low-income consumers are willing and able to pay for healthy products. This type of analysis is conducted to appropriately price healthy products compared to other products that do not meet healthy standards.

In this Index, ATNI found fewer companies providing evidence of conducting comprehensive pricing analysis for their healthy products. Among the seven companies that do so, Nestlé has conducted the most comprehensive analysis as part of its Integrated Commercial Planning process, for all markets it is active in and with specific attention to low-income groups (see Best Practice). FrieslandCampina indicated that it has conducted pricing analysis to assess the extent to which their product offering is aimed at lower-income groups, and whether those products meet the company's Affordable Nutrition Standards (AFS), its nutrition criteria to determine healthiness of products aimed at groups at high-risk of undernutrition. Grupo Bimbo conducts pricing research as part of its Revenue Growth Management methodology, which includes a price management mechanism for Sanissimo brand in the U.S. but does not specifically refer to low-income groups.

Coca-Cola demonstrated conducting appropriate research with which it determined price points for its Minute Maid Vitingo product in India, a specially formulated product to address micronutrient deficiency and malnutrition in the country. The product is fortified with iron, vitamin A, vitamin C, zinc, folic Acid, vitamin B2 and vitamin B12, and offered in dilutable sachets of 18gm priced at INR 5, which is considered to be within the budget of consumers that fall below the .

Companies have shown limited progress in terms of providing examples of price reductions for healthy products and products designed to meet the nutritional needs of priority populations. Six companies specifically offer discounts, price promotions, or coupons on their healthy products, four less than in 2018. As shown in figure 2, only two companies (FrieslandCampina and Danone) provided examples for all the markets in which they operate. Danone shared evidence of offering discounts up to 25 percent on its healthier products aimed at low-income groups. Nestlé, Grupo Bimbo, Ajinomoto, and Keurig Dr Pepper provide similar examples, but only for their selected markets without specifically targeting low-income groups. Nestlé specifically refers to the needs of low-income groups in Nigeria and Philippines in its pricing-related promotional activities.



For healthy products aimed at addressing micronutrient deficiencies in priority populations, 11 companies provide relevant examples – one more than in 2018. Coca-Cola and Mars show improvement by providing examples of reaching priority populations with affordable products in India. Nestlé provides the greatest number of examples from all markets in which it is active. The company highlights its micronutrient fortification strategy in Asia, Oceania, and Sub-Saharan Africa, comprising 64 countries. FrieslandCampina shares various examples of healthy products and brands aimed at addressing micronutrient deficiencies for which it has improved affordability based on its pricing analysis in countries like Nigeria, Philippines, Indonesia, Vietnam, Ivory Coast and Pakistan.

Recommendations C1

ATNI recommends that companies:

- Develop and publish formal commitments, in a policy or similar document, to improve the affordability of healthy products and make specific reference to products designed to address micronutrient deficiencies in priority populations and refer to low-income groups.
- Formulate a clear strategy with objective, , taking into account how healthy products reach low-income consumers in all markets where the company operates.
- Design tailored affordability strategies and objectives for healthy products aimed at addressing micronutrient deficiencies in priority populations and disclose examples of actions taken.
- Conduct regular pricing analysis to assess and address the unmet needs of low-income consumers and use this insight to appropriately price all healthy products.
- Provide and disclose examples of offering discounts, price promotions, or coupons on its healthy products by explicitly focusing on products that meet the company's healthy standard, or by addressing affordability of healthy products relative to products not meeting healthy standards.

C2 Product distribution

What commitments and strategies have companies defined to improve the accessibility of their healthy products, including products that intend to address undernutrition and micronutrient deficiencies in priority populations (e.g., fortified products)?

Companies assessed on this Index achieve an average score of 2.1 in the thematic area of accessibility (accounting for physical access to healthy products). FrieslandCampina achieves the highest score of 7.2, improving from a score of 5 in the 2018 Global Index. Specifically in this area, the company has improved its distribution channels in several low- and middle-income countries by reaching consumers that live in remote, rural areas (see Best practices). Nestlé (5.1) ranks second, followed by Kellogg (5) and Danone (5) sharing third place.

Twelve out of 25 companies have publicly committed to improving the physical accessibility of their healthy products (in 2018 only 10 companies did this). Danone and Meiji have shown improvement by increasing transparency on their commitments. As shown in Table 2, Danone, FrieslandCampina, General Mills, Grupo Bimbo, Kellogg, PepsiCo, and Unilever make commitments with a focus on groups lacking access due to geographical factors. Arla's commitment on this topic is clear and embedded in its Global Health Strategy, but without reference to groups with limited physical access to nutritious food.

Seven companies expressed commitments for improving the accessibility of healthy products specifically designed to address micronutrient deficiencies in priority populations: Arla, Danone, FrieslandCampina, Grupo Bimbo, Kellogg's, Nestlé, and PepsiCo.

In the U.S., Kellogg's commits to provide nutritious cereal products meeting the company's healthy standards in 'value-stores', which the ambition to focus on the needs of children belonging to low-income households that shop in stores like Dollar General and Family Dollar. FrieslandCampina's commitment is embedded in its approach of targeting local distribution channels. With this, the company aims to promote and distribute its affordable nutrition products in remote, rural areas. Danone embeds its commitment in an approach utilizing micro-distribution business models, by which it works with local partners to co-create micro-distribution projects in nine countries.

Seven companies have concrete strategies for improving the physical accessibility of healthy products, as shown in Table 2. PepsiCo has developed a toolkit to provide access through local distribution of products in some low- and middle-income countries. Meiji publicly describes its approach involving 'Home Delivery Service' of its milk products. With this, the company aims to contribute to the health of its consumers daily. Meanwhile, Nestlé aims "to work with governments, non-governmental organizations (NGOs), the professional nutritional community and retailers to increase micronutrient accessibility through partnerships, new routes to market and affordability strategies".

Table 2. Overview of companies' commitments, strategies and actions to improve the physical accessibility of healthy products

	Company has public commitments for healthy products	Company makes reference to populations with limited access to nutritious food (i.e. living in food deserts)	Company has strategy and/or targets in place	Company provides evidence of specifically improving the physical accessibility of its healthy products	Company provides evidence of commercial activities that improve physical accessibility of healthy products that address micronutrient deficiencies
Ajinomoto	▲				✓
Arla	●				✓
BRF*					
Campbell	▲				
Coca-Cola					✓
Conagra					
Danone	▲	★	■		✓
Ferrero					
FrieslandCampina	▲	★	■	Yes, with specific attention to population with limited access	✓
General Mills	▲	★			
Grupo Bimbo	▲	★	■		
Keurig Dr Pepper					
Kellogg	▲	★	■	Yes, with specific attention to population with limited access	✓
Kraft Heinz					
Lactalis*					
Mars					✓
Meiji	▲		■	Yes, with specific attention to population with limited access	✓
Mengniu*					
Mondelēz					
Nestlé	▲		■	Yes, with specific attention to population with limited access	✓
PepsiCo	▲	★	■	Yes, with specific attention to population with limited access	✓
Suntory*					
Tingyi*					
Unilever	▲	★		Yes, with specific attention to population with limited access	✓
Yili*					

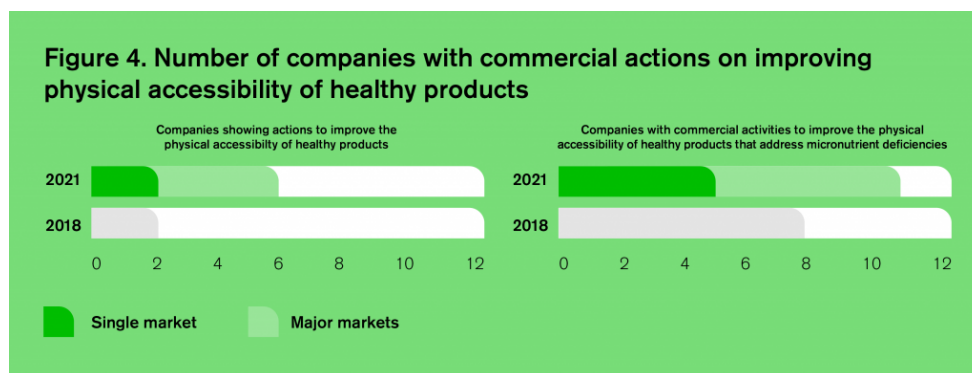
- Clear commitment made for whole business;
- ▲ Broad, stand-alone commitment;
- ★ Makes reference to populations with limited access to nutritious food (i.e., living in food deserts, rural areas);
- Has a strategy/target for healthy products (note: this excludes strategies/targets for products aimed at addressing micronutrient deficiencies)
- ✓ Yes
- * Company did not provide information to ATNI

Eight companies have tailored strategies to reach priority populations with products aimed at addressing micronutrient deficiencies. Unilever has developed a network of small-scale retailers to help them improve access to nutritious, affordable products. Grupo Bimbo retains its strategic 2020 goal since the 2018 Index, by which it aims “to distribute and market fortified/enriched products developed specifically for vulnerable populations with a wide distribution range (more than a trading channel with over 50% range) and a cost per piece at least 5% under the average per category”, but it has not set new objectives going beyond 2020 and does not explicitly refer to the healthiness of these fortified products.

Is there evidence that companies have done analysis and increased their efforts to improve the distribution of their healthy products including products aimed at addressing micronutrient deficiencies in priority populations?

Distribution analysis entails research conducted to determine how best, and through which distribution channels, to reach consumers that lack regular, geographical access to healthy foods.

In this Index ATNI found fewer companies sharing evidence of this type of analysis. Arla, Ajinomoto, Danone, FrieslandCampina, Mars, Nestlé, and PepsiCo provide evidence of this type of distribution-related analysis, with specific attention to populations with limited access to nutritious food. Through its analysis, Danone has implemented micro-distribution projects in nine countries to empower vulnerable populations, mainly women from underprivileged areas, and drive local development, while expanding access to healthy foods and beverages.



Four more companies provide examples of improving the accessibility of their healthy products, as shown in Figure 4. However, data demonstrating that companies' have considered specific arrangements/incentives with retailers and distributors are scarce – and none of the companies provided sufficient examples that would indicate they are addressing issues related to accessibility of healthy products in all their markets. FrieslandCampina, Kellogg's, Meiji, Nestlé, PepsiCo, and Unilever demonstrate relevant actions in this area. Kellogg's focuses on low-income neighborhoods that incorporate arrangements with "value-stores" to provide low-income shoppers with affordable, healthy products.

Three more companies have provided examples of actions to improve accessibility of specific healthy products addressing micronutrient deficiencies in priority populations. Arla, Unilever, Danone, Meiji, Nestlé, and FrieslandCampina share evidence of arrangements with rural distributors in more than one market in which they operate. After a successful experience with the 'Shakti distribution' model (highlighted in the [India Spotlight Index 2020](#)), for door-to-door reach in remote, rural areas, Unilever has launched related programs in 10 more countries, including Ethiopia, Sri Lanka, Pakistan, Colombia, and Egypt. Meiji has a free Home Delivery Service in Japan offering a range of milks, probiotic yogurts, vitamin-rich fruit and vegetable juices, and other products; an offering that has expanded considerably since the 2018 Global Index. The service is used by 2.5 million households in Japan via 3,000 local distributors and is now also offered by its subsidiary in Thailand. Some of the products are fortified with micronutrients, such as 'Meiji Milk Genki' and Meiji TANPACT Lococare' milk, the latter developed specifically for the elderly.

Although this Index has a heavier focus on the way companies improve distribution of healthy products commercially, it does take note of actions companies take non-commercially (although these efforts weigh in less in the end score). Twelve companies provided examples of non-commercial initiatives, such as providing products to be distributed to undernourished groups, supporting programs designed to address undernutrition to reach target groups with appropriate products, providing products to school feeding programs, and food banks, etc.

Recommendations C2

ATNI recommends that companies:

- Develop and publish formal commitments, in a policy or similar document, to improve the physical accessibility of healthy products and make specific reference to products designed to address micronutrient deficiencies in priority populations, and refer to groups with limited physical access to nutritious foods.
- Formulate a clear strategy with objective, , taking into account how healthy products reach consumers with limited access such as those living in poor urban areas, food deserts, rural areas, etc. in all markets where the company operates.
- Design tailored accessibility strategies and objectives for healthy products aimed at addressing micronutrient deficiencies in priority populations. For example, seeking new retail partners to achieve set goals, further developing their local distribution networks, etc., and disclose examples of actions taken commercially.
- Conduct regular distribution analysis to assess and address the unmet needs of consumers with limited access to nutritious foods and use this insight to take specific actions for them.

- Provide examples of actions that have improved accessibility of healthy products – for instance, data to demonstrate that retailers in poor urban or rural areas are supplied with healthier options.



Marketing

Responsible marketing policies and auditing of compliance

The Global Index 2021 assesses companies' nutrition related commitments, practices, and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable, and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories.

Category D on Marketing captures the extent to which companies support all consumers, with special attention to children (including teenagers), to make healthy choices by adopting responsible marketing practices and by prioritizing the marketing of their healthier products. This category weighs in with 20% on the overall Index score companies can achieve. This section also presents the results of the unscored assessment of whether companies' products are suitable to be marketed to children. For this purpose, World Health Organization (WHO) regional nutrient profiling models (NPMs) are used.

Category D consists of three criteria:

- D1 Marketing policy: general aspects of responsible marketing
- D2 Marketing policy: specific arrangements regarding responsible marketing to children including teens
- D3 Auditing and compliance with policy

To perform well in this category, a company should:

- Establish and implement a responsible marketing policy covering all consumers.
- The marketing policy should be comprehensive in its scope, i.e. considering all media channels and should embrace the principles of the International Chamber of Commerce (ICC) general marketing code , as well as the Framework for Responsible Food and Beverage Marketing Communications
- Establish and implement a marketing policy that explicitly covers responsible marketing arrangement for children, including channels, location/settings (like schools), and type of products.
- Companies should commit to not market any unhealthy products to children, including teens, below the age of 18.
- Commission or participate in industry-level independent audits to assess compliance with marketing policies, as well as disclosure of individual results for all types of media.

Ranking on Marketing

D1 Marketing policy **D2** Marketing to children **D3** Auditing and compliance

* Did not provide information to ATNI

FrieslandCampina ranks first in marketing with a score of 7.9. Reasons for the company's lead position are its consistently high scores in each criterion and its commitments and efforts to address nutrition challenges for priority populations. Mars and Nestlé come in second and third with scores above seven, reflecting advanced strategies in protecting consumers, including children, from irresponsible marketing. Although there has been a reshuffle, the top ten companies of the 2018 Index have remained in the lead. Most companies have shifted zero, one, or two ranks compared to 2018. Arla has improved its ranking the most, by five places, due to improvements such as joining the EU pledge on advertising to children, and initiating internal auditing for general audiences. Conagra has decreased its ranking position the most, also by seven places. Importantly, it was not the slight drop in Conagra's score that made it lower its position in the rankings, which was merely 0.4 points, but rather increased scores of other companies.

Category Context

Like any other aspect of our food system, the COVID-19 pandemic has influenced marketing practices by food and beverage companies. As new realities have emerged during the pandemic, such as an increased reliance on e-commerce, food manufacturers have responded by launching new marketing campaigns and advertising. Some companies report having spent less on advertising during the lockdown period because it did not make financial sense to put resources into out-of-home advertising while people were at home. As a result, it is possible that lockdown has accelerated an already significant shift from traditional forms of advertising to online marketing. For more detailed accounts on ways in which access to healthy foods, and food and beverage marketing have been altered by COVID-19, see ATNI's quarterly COVID-19 reports.

Evidence suggests that marketing of unhealthy food negatively impacts food choices, dietary patterns, and health. It is widely agreed by researchers and child advocates that children need special consideration with respect to marketing, because they are unable to fully understand the persuasive intent of advertisements. Children, already being a vulnerable target for marketing of unhealthy foods, could be impacted by this shift to digital marketing in a way that is more difficult to understand, trace, and regulate. There are burgeoning areas for online marketing, such as e-sports and gaming, on new platforms such as Twitch (time spent on this platform, which is particularly popular with young people, rose by almost a quarter globally during the lockdown period). For example, Kellogg is reported to have been increasing its advertising on e-sports and considering video game sponsorships to replace marketing around live sporting events. WHO has urged countries worldwide to monitor the exposure of children and teens to digital marketing.

Relevant changes in methodology

Several changes have been made in the Marketing category since the 2018 Global Index:

- Two separate auditing and compliance criteria for general audiences (D2 in 2018) and for children specifically (D4 in 2018) have for this index merged into a single auditing and compliance criterion, D3. Therefore, chapter D in the current iteration of the Global Index only has three criteria, compared to four 2018.
- The 2018 index had a separate section with specific indicators for undernutrition. In the current index, ATNI applies a more comprehensive approach using the concept of priority populations at risk of any form of malnutrition. The sections on marketing practices to reach priority populations (indicator 5 and 6 of criterion D1), which were previously reported in a separate undernutrition chapter, are now included in the general aspects of responsible marketing (criterion D1).
- Some new indicators are measured, such as the kind of products a company advertises to children, or a company's commitments concerning the form and digital medium of advertisements in schools. Some indicators have been removed.

More details about the changes in the methodology can be found in the [methodology section](#) of this Index.

Key findings

- The average score of all companies combined increased slightly from 3.4 in 2018 to 3.5 in 2021.
- Overall, companies score better in marketing policies for children, including teens, compared to general marketing policies and marketing and compliance. Most (20 out of 25) have a marketing policy specifically covering children. The criterion with the lowest overall score is general aspects of responsible marketing.
- Like 2018, FrieslandCampina ranks first in Marketing with a score of 7.9. The company scores consistently well in each criterion and is the only company to explicitly commit to developing and delivering marketing strategies to reach priority populations.
- Arla has made the largest improvements in its marketing policies and auditing, increasing its overall score by 2.9 points since 2018. The company has made major improvements in their auditing and compliance. Since the 2018 index, Arla has joined the EU pledge and initiated internal auditing for general audiences to complement EU pledge auditing. Additionally, the company improved their general aspects of responsible marketing, as they now apply their responsible marketing policy to more media and provide evidence of taking steps to understand and reach priority populations.
- A gap can be seen at the bottom of the rankings between non-engaging companies and engaging companies. Non-engaging companies rank at the bottom with scores ranging from zero to 0.4 (obtained by BRF), whereas of companies that engage, 2.1 is the lowest score (obtained by Conagra). This gap emphasizes why ATNI encourages companies to engage in our research process and prevent a forced score of zero points due to lack of information.

General Recommendations

Companies are encouraged to:

- expand the scope of media channels covered by their marketing policies, and explicitly outline the channels in their policies.
- align their marketing commitments with the ICC framework, and show leadership by making commitments that go beyond the framework.
- increase commitment to transparency in their marketing policies.
- explicitly commit to developing and delivering marketing strategies appropriate to reaching priority populations.
- not advertise any products to children, including teens, or only advertise products meeting WHO regional standards. If companies do choose to advertise products to children, they are recommended to use responsible marketing techniques aimed at children, including teens.
- lower audience thresholds used to restrict their advertising on media to below 25%, apply this restriction to all children below the age of eighteen, and apply this beyond measured media only.
- Extend marketing restrictions to fully cover the school environment (both primary and secondary), and other places where children, including teens, typically gather.
- Perform annual audits on their compliance with their marketing policy, where possible by an external auditor, and disclose information about this audit publicly and transparently.
- implement response mechanisms to ensure corrective measures after noncompliance with a marketing policy.

Noteworthy changes and best practices



FrieslandCampina ranks first in general aspects of responsible marketing. Besides having the highest overall score, it is the only company to make explicit commitments for marketing strategies to reach priority populations, provides evidence of taking steps to understand and reach these populations with appropriate products through tailored marketing, and does this on a global scale.

FrieslandCampina is the only company to make explicit commitments to reach priority populations. In its "Broadening access to nutrition programme", the company aims to help combat undernutrition by broadening the availability and affordability of healthy and fortified foods, especially for consumers at higher risk of undernutrition or micronutrient deficiencies, as a result of reduced access to healthy and affordable foods (e.g., lower income groups). In developing countries where FrieslandCampina has an operating company and where milk and milk products are not affordable or available, especially for lower income groups, the company focuses on commercial activities and non-commercial activities to reach these people. To market these products to specific populations, the company uses a promotion strategy of advertising, social media, and educational messages, all depending on the country and local distribution channels used by the target group and brand. One example is the promotion of its small-packaged and small-sized Peak product in Nigeria through TV and commercials and educational messages on Facebook.

D



Arla is the only company to specifically refer to children as persons under the age of 18 years, as defined by the Convention on the Rights of the Child (CRC). In its policy, the company includes all children under the age of 18 and specifies which part of the policy applies to all children below 18 years and which part to children below 12 years. No other company extends the age range of its policy so high as under the age of 18.

D



Unilever performs best amongst companies in marketing techniques and materials aimed at children and teens. The company commits to all responsible marketing techniques laid out by the International Chamber of Commerce (ICC) Framework and the United Nations Children's Fund's (UNICEF) A Child Rights-Based Approach to Food Marketing, and makes additional commitments characterizing industry-leading behavior. Additionally, it commits to all responsible practices laid out by the ATNI methodology regarding the use of children, celebrities (including influencers), and fantasy and animated characters.

D



Coca-Cola performs best in marketing policies for in or around schools and other educational centres, facilities and premises aimed at children and teens. The company's commitments include both primary and secondary schools, are extended to areas near schools, and include new media and educational materials.



Mars received the highest possible score for auditing and compliance. The company audits its compliance with marketing policies for all audiences to the same standards that it applies to auditing marketing to children, has the audit performed annually by an external auditor, covers all relevant media channels, and has a response mechanism for corrective action in place. Mars also has compliance levels for TV and digital marketing over 90% and gains full score for disclosure.



D1 Marketing policy: general aspects of responsible marketing

Did companies expand the scope of media channels covered by their policies?

Overall, slight improvements can be seen in the different media channels for all audiences covered by company policies, and companies apply the same standards to these policies. Seven companies, including PepsiCo, Unilever, Mars and Nestlé apply their public responsible marketing policy to all media covered by ATNI methodology, whereas only six companies did so in 2018. Twelve companies include several of the listed media in the scope of their policies, but not all. Of these, the media most often omitted were in-store/point of sales marketing and sponsorship.

The media channels least covered by company policies in 2018 were in-store marketing and cinema, which were only covered by policies of seven companies. The coverage of those media channels has since increased. In the Global Index 2021, eight company policies cover in-store marketing, and 13 companies have policies covering cinema (as part of additional forms of marketing).

In the 2018 index, 11 companies did not specify the media channels to which their responsible marketing policies apply. In this report, which includes three new companies, only six did not specify media channels.

To what extent did the companies strengthen their commitments to market responsibly to all consumers?

Table 1 displays all relevant commitments made publicly by the companies. A total of 10 companies commit to a public responsible marketing policy related to the representation of products that is fully aligned with the ICC Framework. Since 2018, Kellogg and Meiji have joined the eight companies who already had such commitments (Mondelēz, Danone, Coca-Cola, Ferrero, Mars, Nestlé, PepsiCo, and Unilever) and now also pledge to comply within the ICC Framework.

Similar to 2018, Unilever, Danone, Mars, and Nestlé are the only companies to fully commit to the ICC Framework and go beyond by committing not to use models with a body mass index (BMI) of under 18.5, and to present products in the context of a balanced diet. Since 2018, no new companies have made these commitments. Nine companies did not make any relevant commitments aligned with the ICC Framework or beyond. In contrast to 2018, Campbell and Kraft Heinz were not credited for this indicator in the 2021 Index, because the updated methodology requires policies to be public for the companies to be credited, whereas this was not a requirement in 2018. Five companies did not make any relevant public commitments related to the representation of products in 2018. Of these, Meiji is the only company to improve its policy commitments, and now has a public 'responsible marketing to children policy' completely aligned with the ICC Framework.

Table 1. Relevant public commitments made by selected companies

	Alimonto	Alia	BIF*	Coca-Cola	Conagra	Danone	Ferrero	Friesland-Campina	Grupo Bimbo	Kellogg	Mars	Meiji	Mondelēz	Nestlé	Pepsi	Unilever	Yili*
Company commits to presenting products in the appropriate portion size and context (and not to condone or encourage excess consumption) (Article 1 of ICC).	✓	•	•	•		•	•	•	•	•	•	✓	•	•	•	•	
Company commits to a sound scientific basis for all nutritional and health benefit information and claims for food and beverage products. And, where claims or terminology used in marketing communications might reasonably be interpreted by a consumer as health or nutrition claims, they should be supportable with appropriate scientific evidence (Article 4 of ICC).	✓	•	•	•	✓	•	•	•		•	•	✓	•	•	•	•	
Company commits that copy, sound and visual presentations in marketing communications for food and beverage products should accurately represent the material characteristics of the product featured, such as taste, size, content nutrition or health benefits, and should not mislead consumers concerning any of those characteristics (Article 5 of ICC).	•	•		•	•	•	•	•		•	•	✓	•	•	•	•	✓
Company commits not to represent food products not intended to be substitutes for meals as such (Article 5 of ICC).		•		•		•	•	•	•	•	•	✓	•	•	•	•	
Company commits not to use consumer taste or preference tests in a way that might imply statistical validity if there is none. Testimonials are based on well-accepted and recognized opinion from experts (Article 9 of ICC).				•		•	•			•	•	✓	•	•	•	•	
Company commits not to undermine the concept of healthy, balanced diets, or the importance of a healthy, active lifestyle (Article 17 of ICC).	✓		•	•		•	•	•	•	•	•	✓	•	•	•	•	
Company commits not to use any models with a BMI of under 18.5 (industry best practice).						•		•	✓	✓	•			•		•	
Company commits to presenting products in the context of a balanced diet (industry best practice).		✗	•			•	•	•	✓	✗	•			•		•	

✓ new commitment
 • existing commitment
 ✗ removed commitment
 * Company did not provide information to ATNI

There is room for improvement in transparency in marketing policies. Of the 25 companies included in the Index, 14 do not commit to clearly display the company or brand name when advertising on virtual media, nor to ensure that the true commercial purpose of marketing communications is transparent and recognizable as an advertisement (in alignment with the ICC Framework Article 7). Eight companies include one of these commitments in their policies, and only three commit to both. Only PepsiCo, Unilever, Danone, and Coca-Cola disclose a commitment to clearly distinguish marketing messages from other content.

How strong are companies’ marketing practices to reach priority populations?

Besides FrieslandCampina, no company explicitly commits to developing and delivering marketing strategies appropriate to reaching priority populations, in all countries in which it operates. Notably, seven other companies which did not make explicit commitments, did provide evidence of steps taken to understand and reach priority populations through tailored marketing for appropriate products. Examples include promoting the consumption of iron-fortified foods to women at risk of anaemia or fortified fat-filled milk powder to low-income groups.

Recommendations D1

To further strengthen responsible marketing policies in the food and beverage sector, companies are encouraged to:

- Expand the scope of media channels covered by their marketing policies, and explicitly outline the channels in their policies.** In-store/point of sales and sponsorship marketing is often excluded from marketing policies, and companies which do not explicitly include these channels in their policies are encouraged to do so. Furthermore, ATNI emphasizes the need for companies which do not specify to which media their policies apply, to explicitly state the media channels covered by their public marketing policies.
- Align their marketing commitments with the ICC framework, and show leadership by making commitments that go beyond the framework.** At the time of this report, only 10 companies have marketing policies fully aligned with the ICC framework. The ethical guidelines published by the ICC are a minimum set of standards to ensure responsible marketing safeguarding better nutrition, and companies should strive to adhere to those.
- Increase commitment to transparency in their marketing policies.** To date, only three companies commit to clearly display the company or brand name when advertising on virtual media and to ensure that the true commercial purpose of marketing communications is transparent and recognizable as an advertisement.

- **Explicitly commit to developing and delivering marketing strategies appropriate to reaching priority populations.** Twenty-four companies included in the Index do not make such a commitment. Although some do provide evidence of taking steps to understand and reach priority populations, companies are advised to include this as an explicit commitment in their marketing policies.

D2 Marketing policy: Specific arrangements regarding responsible marketing to children

Have companies strengthened their policies to market their products to children responsibly?

Twenty out of 25 companies have a public policy that addresses responsible marketing to children specifically. Since the 2018 iteration of the Global Index, when this number was only 18, Meiji has implemented a new public policy. Of the companies measured for the first time in this iteration, only KDP has a policy addressing marketing to children specifically. Nineteen companies publish their policy for marketing to children in full or make public and explicit references to commit to industry-wide pledges or initiatives.

A newly measured indicator is on the kind of products that a company considers suitable to advertise to children, including teens. Only Mondelez, Unilever, Coca-Cola, and Mars do not advertise products to children below the age of 12. No company advertises only products meeting the WHO regional standards, but 15 companies advertise only products meeting the company's own or industry association-related standards, to children under the age of 12. Six companies do not restrict product advertising or shared no information with ATNI. Arla specifies which part of the policy applies to all children under 18 years and which part to children under 12 years. Unilever extends the age range for digital marketing specifically from 12 to 13, as it commits not to market directly to children under the age of 13 on digital platforms. Nestlé has a similar approach, by committing not to market to children under the age of 13 on social media.

Regarding responsible marketing techniques and materials aimed at children, commitments of companies vary and there is room for improvement. An overview of the commitments made by companies in this area can be seen in Table 2.

Unilever scores the highest in this area, as it makes all commitments in two out of three categories of techniques and materials. Together with Nestlé and Kellogg, Unilever commits to all responsible marketing techniques laid out by the ICC Framework and UNICEF's 'A Child Rights-Based Approach to Food Marketing', and even takes a further step by committing to ensure that marketing materials contain an educative message in relation to healthy diets and lifestyles, and not to brand merchandise aimed at children except related to healthy products – which is considered industry best practice. Fifteen other companies make commitments in this area, whereas seven companies make no commitments at all or shared no information with ATNI.

Regarding the use of children, celebrities, and fantasy and animated characters, Unilever and FrieslandCampina make all the relevant commitments laid out in the ATNI methodology. Fifteen companies made some commitments, while eight companies made no commitments or shared no information. In 2018, most companies had a commitment not to use third party fantasy and animated characters with a strong appeal to children, but only seven companies extended their commitments to only use their own fantasy characters when marketing healthy products. In 2021, 13 companies made such a commitment, some with the exception of point-of-sales and packaging.

Table 2. Commitments on marketing techniques and materials aimed at children made by selected companies

	Ajinomoto	Arla	BRF*	Conagra	Danone	Ferrero	Friesland-Campina	General Mills	Grupo Bimbo	Kellogg	Kraft Heinz	Mars	Mondelēz	PepsiCo	Unilever
Does the company adhere to responsible marketing techniques aimed at children, by committing to:															
Not to create a sense of urgency	●	●	●		●	●	●	●		●	●	●	●	●	●
Not to use inappropriate price minimization	●		●		●	●	●	●		●	●	●	●	●	●
Not to exploit a child's imagination in a way that could mislead him/her about the nutritional benefits of the product involved	●	●	●		●	●	●	●		●	●	●	●	●	●
Support the role of parents or others responsible for guiding diet and lifestyle choices or not to undermine the role of parents or others responsible for guiding diet and lifestyle choices	●	●	●		●	●	●	●		●	●	●	●	●	●
Ensure that marketing materials contain an educative message in relation to healthy diets and lifestyles			●		●	●	●	●		●	●	●	●	●	●
Not to brand merchandise aimed at children except related to healthy products									●	●	●				●
Does the company commit to use children, celebrities (including influencers), or fantasy and animated characters responsibly or not at all?															
Commits not to sponsor people, materials or activities popular with children at all or except in conjunction with healthy products	●				●	●	●				●				●
Commits to not depict children on packaging at all or except in conjunction with healthy products					●	●									●
Pledges not to use celebrities and other people with strong appeal to children in marketing of products at all or except in conjunction with healthy products	●		●	●	●	●	●	●	●	●	●	●	●	●	●
Pledges that celebrities or others (including influencers), if used in marketing, will not imply they have achieved their enhanced performance or status through use of the product	●		●	●	●	●	●	●	●	●	●	●	●	●	●
Pledges not to use third party nor own fantasy and animation characters with a strong appeal to children in marketing of products at all or except in conjunction with healthy products, in all forms of marketing					●						●	●			●
Pledges not to use third party nor own fantasy and animation characters with a strong appeal to children in marketing of products at all or except in conjunction with healthy products, with an exception for point of sale and packaging	●	●	●	●			●		●	●	●			●	
Regarding responsible use of promotional toys, games, vouchers and competitions; does the company commit to:															
Never make use of promotional games, toys, vouchers, competitions etc. in their marketing to children												●			
Using promotional games, toys, vouchers, competitions etc. only in accordance to WHO regional standards															
Using promotional games, toys, vouchers, competitions etc. only in accordance to the company's own or industry association-related standards for marketing to children					●	●	●	●	●	●			●		●

● commitment found
* Company did not provide information to ATNI

Mars is one of only two companies to make all commitments covered in the ATNI methodology for responsible use of promotional toys, games, vouchers and competitions. The company commits never to make use of these tools in their marketing to children. No companies commit to using these tools only in accordance with WHO regional standards, which would have given them the same score. Ten companies committed to using these tools only in accordance with the company's own or industry association-related standards, while 13 companies made no relevant commitments at all or shared no information with ATNI.

What audience thresholds and age ranges do companies use to restrict marketing to children?

The percentage of audience thresholds that companies use to restrict their advertising on measured media to avoid inappropriately reaching children, including teens, varies. Table 3 portrays audience thresholds used by companies and the corresponding age ranges. Eighteen companies included in the Index use audience thresholds to restrict their advertising, but the age range most often used is up to 12 years old. The lowest thresholds lie below 25%, which is only upheld by Unilever, Mars and Nestlé. Fourteen companies use between 26-35% as a threshold, whereas BRF uses a threshold above 50%. Seven companies do not specify a threshold used in their marketing strategies.

In 2018, Arla was the only company to extend its age restrictions (for a specific part of their policy) to children below the age of 18; whereas most other companies with age restrictions had set them at 12 years old. Currently, Arla is still the only company to do so, while 16 companies use an age range up to the age of 12, and Campbell up to the age of six.

Table 3. Audience thresholds and age ranges that companies use to restrict their advertising to avoid inappropriately reaching children

What percentage audience threshold does the company use to restrict its advertising on measured media to avoid inappropriately reaching children?	Audience threshold <25%	Unilever, Mars, Nestlé
	Audience threshold 26 - 35%	Mondelēz, Arla, PepsiCo, Kellogg, Danone, Campbell, Grupo Bimbo, General Mills, Coca-Cola, Kraft Heinz, Conagra, Ferrero, Keurig Dr Pepper, FrieslandCampina
	Audience threshold 36 - 50%	
	Audience threshold >50%	BRF*
To which age range does the restriction in advertising apply?	Children below the age of 18	Arla
	Children below the age of 12	Mondelēz, PepsiCo, Unilever, Kellogg, Danone, Grupo Bimbo, General Mills, Coca-Cola, Kraft Heinz, Keurig Dr Pepper, BRF*, Conagra, Ferrero, Mars, Nestlé, FrieslandCampina
	Children below the age of 6	Campbell

* Company did not provide information to ATNI

Mondelēz, Mars, and Nestlé are some of the companies that utilize all relevant tools laid out by the ATNI methodology to ensure that its digital marketing does not reach younger age groups and apply these tools to all forms of media. Box 4 provides an overview of the tools and strategies companies can use to prevent their digital marketing from reaching children, including teens, and why this is important. Thirteen companies apply some of the tools listed, while eight companies do not apply any or shared no information.

Figure 2. Tools implemented to prevent digital media marketing from reaching children (number of companies)

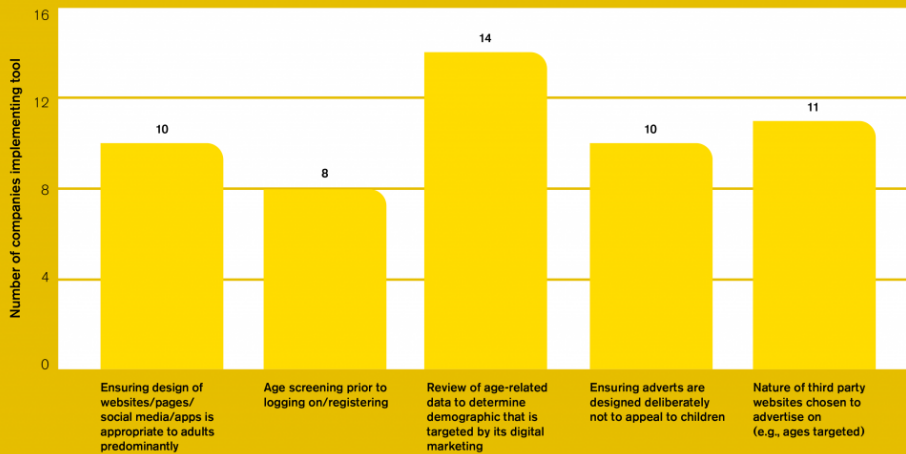


Figure 3. Scope of media covered by the age restriction tools in Figure 2 (number of companies)

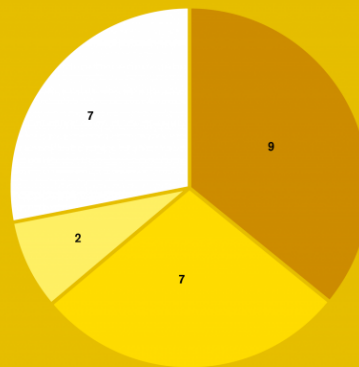
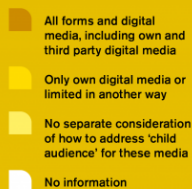


Figure 2 shows the different tools covered by the ATNI methodology, that companies can use to prevent their digital media from reaching younger age groups, and the amount of companies in the Index using them. Figure 3 shows percentages of companies in the Index applying tools to different digital media.

How strong are company policies for responsible marketing in places where children gather?

In 2018, marketing around schools was an area in which little progress had been made. For most companies (16) marketing restrictions only applied inside primary schools. Companies which extended their commitment to areas near primary schools were Nestlé (for ice-cream, confectionary, and water-based beverages) and Danone. Coca-Cola has made this same commitment since then for Australia, but 14 companies still limit the scope of their commitment to inside primary schools. Two companies commit to only market 'healthy' products in or near primary schools, and six companies have made no relevant commitment or shared no information. Importantly, the nutritional criteria or NPMs used by companies vary, meaning their definitions of 'healthy' products do as well. Therefore, the range of products deemed 'healthy' enough to market inside schools may differ per company. For more information on nutritional criteria and NPMs used by companies, see the Products chapter (B).

Responsible marketing commitments in and around secondary schools are even less robust, as only Coca-Cola extends its commitment to areas near secondary schools. Only six companies commit not to market in secondary schools, four companies to advertise only 'healthy' products in or near secondary schools, and 14 companies do not have a relevant policy or did not share information. Although this is a slight improvement compared to 2018, where only four companies made a commitment not to market in secondary schools, companies are recommended to extend their policies to secondary schools to include teens in their responsible marketing policies. Danone, a company that showed best practice in this area in 2018, updated its pledge, which does not contain explicit reference that the company has maintained a commitment not to market near secondary schools.

Improvements have been made in the way companies advertise in schools. In this index, for school related marketing, six companies explicitly commit to include new media marketing in their policies, and to only offer 'educational materials' when in agreement with schools or parents. Eight companies commit to either one of these.

Besides schools, other places where children gather, such as childcare, other educational establishments, or family and child clinics, are scarcely covered by company policies and remain an area for improvement. Eight companies commit to only market "healthy" products in or near these settings. The other companies have made no relevant commitments or shared no information.

Recommendations D2

To further strengthen marketing policies in the food and beverage sector, companies are encouraged to:

- **Not advertise any products to children, including teens, or only advertise products meeting WHO regional standards.** Most companies use their own or industry association-related standards for restricting advertising products to children, including teens, whereas not advertising any products, or only those meeting the WHO regional standards, is the gold standard for marketing to children policies. Companies are also encouraged to increase the age range for this restriction to 18.
- **If companies do choose to advertise products to children, they are recommended to use responsible marketing techniques aimed at children, including teens.** Commitments regarding responsible marketing techniques and materials to protect children are not robust or complete enough. Companies are recommended to follow industry best practices described in this chapter, by making these relevant commitments to protect the vulnerable group of children, including teens, from unethical and irresponsible marketing.

- **Lower audience thresholds used to restrict its advertising on media to below 25%, apply this restriction to all children below the age of 18, and apply this beyond measured media only.** Currently, only three companies use an audience threshold below 25%, and only one company applies their threshold to children below the age of 18.
- **Extend marketing restrictions to fully cover the school environment (both primary and secondary), and other places where children, including teens, typically gather.** Furthermore, companies could show industry leadership and voluntarily restrict their marketing practices in public spaces where children are likely to be exposed to them.

D3 Auditing and compliance with policy

How do companies audit compliance against their policies for responsible marketing for all audiences?

Only five out of 25 companies – Mondelez, Arla, Mars, Nestlé and FrieslandCampina – audit compliance with their marketing policies covering all audiences, while 12 companies audit their compliance for children only. Mars and FrieslandCampina assess compliance of all aspects of marketing (covering all audiences) to the same standards applied to children, which is considered best practice. The other three companies use less restrictive standards for general audiences. Currently, only eight companies do not report having any type of auditing mechanisms in place. This is an improvement compared to the 2018 Index, where 16 companies did not report on auditing. However, only eight companies disclose information about their audits publicly.

In addition to Danone, Mars and Nestlé, who already had such policies in place in 2018, FrieslandCampina now also appoint an independent external auditor (not related to, or in addition to, an industry association-appointed third-party auditor) to assess compliance regarding children – another best practice encouraged by ATNI. However, progress has to be made in this area, as 13 companies have their audit undertaken by an industry association or an industry association-appointed third-party auditor.

While most companies that audit their compliance perform an annual audit for children only and less frequently for all audiences, Arla, Mars, Nestlé and FrieslandCampina undertake an audit covering all audiences (including children) annually.

Importantly, all companies that are signatories of the EU pledge are required to monitor and report on the implementation of their commitments. Therefore, all signatories are automatically credited for auditing their marketing practices to children annually by an industry association (appointed) third-party auditor across all media, and for some disclosure elements.

Which forms of marketing are included by the audits?

Eight companies audit compliance across all media and in all its forms. Of the remaining nine companies which perform audits, six audit compliance across main print, traditional and digital media, but with no specific reference to the forms of marketing used, and three audit compliance across a limited selection of media, although details are unclear. In some instances, audits are initiated by industry associations (e.g., the EU pledge) or governments (e.g., the Dutch ministry of Health). Even if companies are audited as commissioned by these external organisations, the companies are encouraged to initiate (additional) external audits from within.

Do companies comply with marketing policies?

For TV and digital marketing, compliance levels (of companies that audit) are generally high. Eleven companies have compliance levels over 90% for TV, of which only four (Danone, Mars, Nestlé and FrieslandCampina) are assessed by an independent external auditor, while seven are assessed by an industry association (appointed) third party auditor. Ten companies have compliance levels over 90% for digital marketing, of which (the same) four are assessed by an independent external auditor, and six by an industry association (appointed) third party auditor. However, disclosure by companies on this topic is limited, as the remainder of companies which perform audits do not report on their compliance levels, and only five companies in total publicly disclose their compliance levels. Additionally, only five companies – Unilever, Danone, Coca-Cola, Mars, and Nestlé – have a response mechanism to ensure corrective measures are taken regarding any noncompliance with its marketing policy.

Recommendations D3

To further strengthen marketing policies in the food and beverage sector, companies are encouraged to:

- **Perform annual audits on its compliance with its marketing policy, where possible by an external auditor, and disclose information about this audit publicly.** Currently, most audits are performed for child audiences only, and those who do perform audits for all audiences often hold this to lower standards than audits covering children. Although this is an improvement compared to 2018, more remains to be done. Even if audits are initiated by relevant governments or industry associations, companies are encouraged to implement (additional) external auditing.
- **Increase transparency regarding compliance.** As only five companies disclose their compliance levels publicly, compliance to responsible marketing policies cannot be checked and companies cannot be held accountable for their marketing practices.
- **Implement response mechanisms to ensure corrective measures after noncompliance with a marketing policy.**

Products found suitable to be marketed to children

This part of the product profile assessment gives an indication on the number of products which are considered suitable to be marketed to children, but does not impact company scores in Category D. The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios undertaken by analyzing the levels of fat, salt, sugar, and other components within individual products. ATNI commissioned an independent research organization, The George Institute for Global Health, to undertake the nutrition profiling element of the Product Profile.

Two sets of results are generated for each company: one to determine the nutritional quality of the company's products, by applying the Health Star Rating (HSR) at both category and portfolio level, and another by using market-specific WHO regional NPMs to determine what percentage of products are suitable to be marketed to children.

This assessment does not investigate whether these products are, in practice, marketed to children by the companies, but rather, if they are suitable to. If companies are found to have a large proportion of products not suitable to be marketed to children, it is of high priority that the company implement a rigorous responsible marketing policy for children and tries to increase the number of healthier products in its portfolio.

Importantly, this assessment does not affect companies scoring in the Index. In contrast, the Product Profile results using the HSR system are integrated in Category B. This assessment provides an additional perspective on the healthiness of companies' portfolios.

To select the products to be included in this assessment, a maximum of 10 major markets are selected, aiming to cover 80% or more of the company's global retail sales (fiscal year 2019). For each market, the top five best-selling product categories are identified, of which all products are included in the assessment. Details on the scope of this assessment are provided in Table 4 below.

Table 4. Descriptive statistics used in the assessment of suitability to market to children

	Markets included in the assessment	WHO models applied	Product categories	Total number of products included in the assessment for marketing to children	Global sales represented by countries and categories selected (%)	Does the company have a marketing policy covering children?
Ajinomoto	Brazil, Japan, Thailand, USA	PAHO, WPR, SEAR	Sauces, Dressings and Condiments; Concentrates; Soup; Ready Meals; RTD Coffee; Rice, Pasta and Noodles; Processed Meat and Seafood	403	80-90	✓
Arla	Australia, Canada, Denmark, Germany, Hong Kong, Russia, Sweden, United Kingdom, USA, Finland	WPR, PAHO, EURO	Dairy; Sauces, Dressings and Condiments; Soup	1073	80-90	✓
BRF*	Brazil	PAHO	Dairy; Ice Cream and Frozen Desserts; Processed Fruit and Vegetables; Processed Meat and Seafood; Ready Meals	147	90-100	✓
Campbell	USA, Canada, Mexico	PAHO	Soup; Savoury Snacks; Sauces, Dressings and Condiments; Baked Goods; Juice	1159	70-80	✓
Coca-Cola	Australia, China, Hong Kong, India, Japan, Mexico, New Zealand, South Africa, United Kingdom, USA	WPR, SEAR, PAHO, EURO, AFR	Asian Speciality Drinks; Bottled Water (other); Bottled Water (pure); Carbonates; Concentrates; Dairy; Juice; RTD Coffee; RTD Tea; Sport Drinks	1346	50-60	✓
Conagra	Hong Kong, India, New Zealand, Mexico, USA	PAHO, WPR, SEAR	Other Hot Drinks; Breakfast Cereals; Dairy; Edible Oils; Processed Fruit and Vegetables; Processed Meat and Seafood; Ready Meals, Sauces, Dressings and Condiments; Savoury Snacks; Sweet Spreads	2021	70-80	✓
Danone	Australia, Brazil, China, France, Hong Kong, Mexico, Russia, South Africa, United Kingdom, USA	WPR, PAHO, EURO, AFR	Bottled Water (other); Bottled Water (pure); Dairy; Juice; RTD Coffee	1642	50-60	✓
Ferrero	Australia, China, Germany, Hong Kong, India, Italy, Mexico, New Zealand, United Kingdom, USA	WPR, EURO, SEAR, PAHO	Baked Goods, Confectionery; Dairy; Sweet Spreads; Sweet Biscuits, Snack Bars and Fruit Snacks	1324	50-60	✓
Friesland-Campina	Germany, Hong Kong, Indonesia, Netherlands, Nigeria, Philippines, Russia, Thailand, United Kingdom, Vietnam	EURO, WPR, AFR, SEAR	Dairy; Processed Meat and Seafood; Other Hot Drinks	494	70-80	✓
General Mills	Australia, Canada, China, Hong Kong, India, Mexico, New Zealand, South Africa, United Kingdom, USA	WPR, PAHO, SEAR, AFR, EURO	Breakfast Cereals; Baked Goods; Dairy; Ice Cream and Frozen Desserts; Ready Meals; Rice, Pasta and Noodles; Sauces, Dressings and Condiments; Soup; Sweet Biscuits, Snack Bars and Fruit Snacks; Sweet Spreads	5586	60-70	✓
Grupo Bimbo	Brazil, Canada, China, Mexico, United Kingdom, USA	PAHO, WPR, EURO	Baked Goods; Confectionery; Savoury Snacks; Sweet Biscuits, Snack Bars, and Fruit Snacks	992	80-90	✓
KDP	Hong Kong, Mexico, USA	WPR, PAHO	Bottled Water (pure); Bottled Water (other); Carbonates; Juice; Processed Fruit and Vegetables; RTD Tea	499	90-100	✓
Kellogg	Australia, Canada, China, Hong Kong, India, Mexico, New Zealand, South Africa, United Kingdom, USA	WPR, PAHO, SEAR, AFR, EURO	Baked Goods; Breakfast Cereals; Processed Meat and Seafood; Savoury Snacks; Sweet Biscuits, Snack Bars and Fruit Snacks	1349	70-80	✓
Kraft Heinz	Australia, Canada, China, Hong Kong, India, Mexico, New Zealand, United Kingdom, USA	WPR, PAHO, SEAR, EURO	Juice; Baked Goods; Concentrates; Dairy; Processed Fruit and Vegetables; Ready Meals; Sauces, Dressings and Condiments; Savoury Snacks; Soup; Sweet Spreads	3897	70-80	✓
Lactalis*	Australia, Brazil, Canada, China, France, India, Mexico, South Africa, United Kingdom, USA	WPR, PAHO, SEAR, AFR	Dairy; Juice; RTD Coffee; Sauces, Dressings and Condiments	1533	50-60	✗
Mars	Australia, China, Hong Kong, India, Mexico, New Zealand, Russia, South Africa, United Kingdom, USA	WPR, SEAR, PAHO, EURO, AFR	Confectionery; Dairy; Ice Cream and Frozen Desserts; Ready Meals; Rice, Pasta and Noodles; Sauces, Dressings and Condiments; Savoury Snacks; Soup	3382	60-70	✓
Meiji	China, Hong Kong, Japan	WPR	Confectionery; Dairy; Ice Cream and Frozen Desserts; Ready Meals; Sweet Biscuits, Snack Bars and Fruit Snacks	782	90-100	✓
Mengniu*	China; Hong Kong	WPR	Breakfast cereals; Dairy; Ice Cream and Frozen Desserts; Other Hot Drinks	261	90-100	✗
Mondelēz	Australia, Brazil, China, Hong Kong, India, Mexico, New Zealand, South Africa, United Kingdom, USA	WPR, PAHO, SEAR, AFR, EURO	Baked Goods; Concentrates; Confectionery; Dairy; Other Hot Drinks; Savoury Snacks; Sweet Biscuits, Snack Bars and Fruit Snacks	3658	50-60	✓
Nestlé	Australia, Brazil, China, France, Hong Kong, India, Mexico, South Africa, United Kingdom, USA	WPR, PAHO, SEAR, AFR	Bottled Water (pure); Bottled Water (other); Breakfast Cereals; Carbonates; Concentrates; Confectionery; Dairy; Other Hot Drinks; Processed Meat and Seafood; Ready Meals; Rice, Pasta and Noodles; RTD Coffee; Sauces, Dressings and Condiments; Soup; Sweet Biscuits, Snack Bars and Fruit Snacks	2794	40-50	✓
PepsiCo	Australia, China, Hong Kong, India, New Zealand, Russia, Mexico, South Africa, United Kingdom, USA	WPR, SEAR, EURO, PAHO, AFR	Bottled Water (other); Bottled Water (pure); Breakfast Cereals; Carbonates; Concentrates; Dairy; Energy Drinks; Juice; Sauces, Dressings and Condiments Savoury Snacks; Sports Drinks; Sweet Biscuits, Snack Bars and Fruit Snacks	2877	60-70	✓
Suntory*	Australia, China, France, Germany, Hong Kong, Japan, New Zealand, South Africa, United Kingdom	WPR, EURO, AFR	Baked Goods; Bottled Water (other); Bottled Water (pure); Carbonates; Concentrates; Dairy; Energy Drinks; Juice; RTD Coffee; RTD Tea; Sports Drinks	874	80-90	✗
Tingyi*	China	WPR	Bottled Water (pure); Dairy; Juice; Rice, Pasta and Noodles; RTD Tea	335	90-100	✗
Unilever	Australia, Brazil, India, China, France, Germany, Mexico, South Africa, United Kingdom, USA	WPR, PAHO, SEAR, EURO, AFR	Concentrates; Ice Cream and Frozen Desserts; Other Hot Drinks; Processed Meat and Seafood; Ready Meals; Rice, Pasta and Noodles; RTD Tea; Sauces, Dressings and Condiments; Soup; Sweet Spreads	3,616	50-60	✓
Yili*	China; Hong Kong	WPR	Dairy; Ice Cream and Frozen Desserts	188	90-100	✗

✓ Yes
 ✗ No
 * Company did not provide information to ATNI

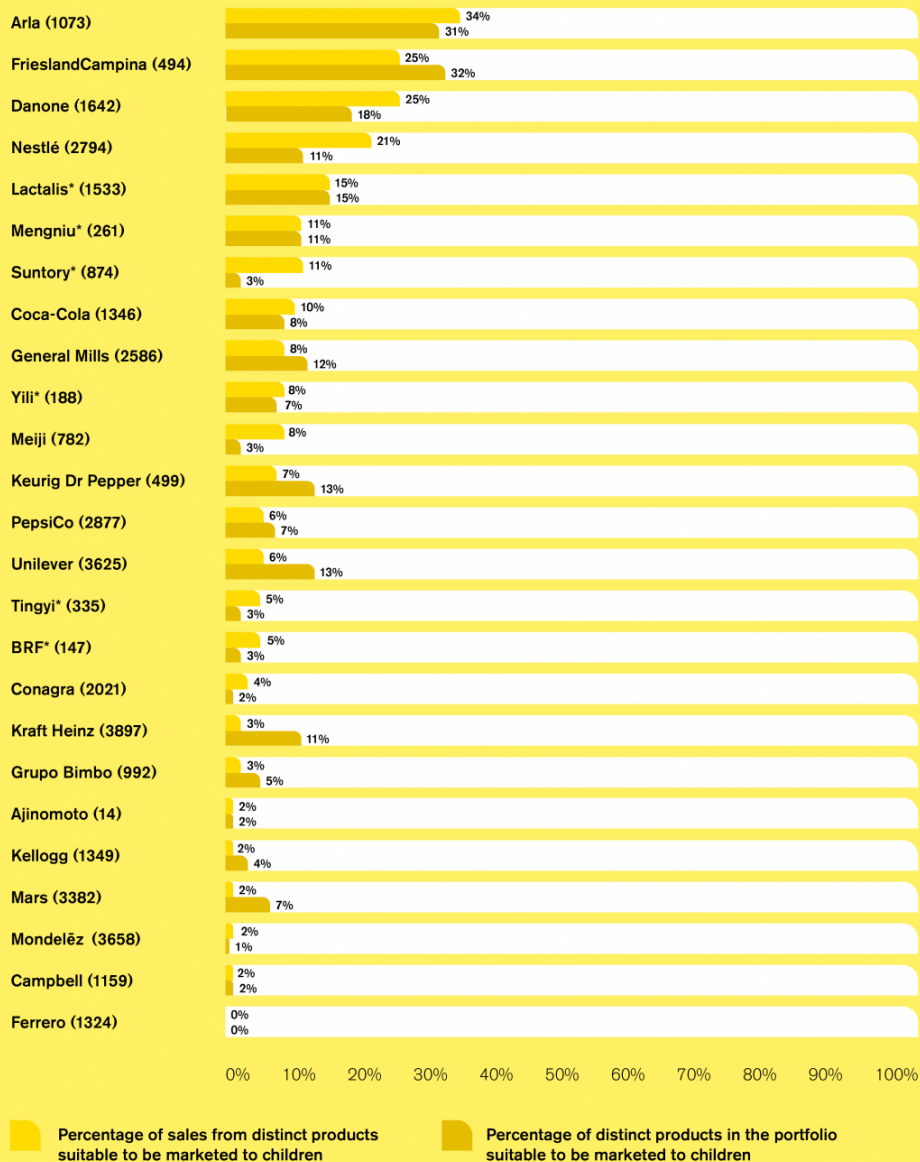
The proportion of products found suitable to be marketed to children, and the sales derived from these products, can be seen in Figure 4. In total, only 3493 out of 38852 assessed products were found suitable to be marketed to children based on the criteria of the relevant WHO NPMs. This represents 9% of the distinct products assessed and 9% of the sales value of packaged foods of all companies combined. This is considerably lower than the results of the Product Profile section in Category B, where 31% of assessed products was found to meet the 'healthy' threshold with an HSR above 3.5. This lower result reflects the more stringent criteria applied in the WHO models, on account of different nutritional

needs of children compared to adults (entire categories are ineligible under the WHO criteria, whereas the HSR uses a cut-off point to determine healthiness). None of the 25 companies assessed were found to have a considerable proportion of assessed products suitable to be marketed to children (more than half the products in their portfolios meeting WHO criteria). This highlights the urgent need for companies to improve their product portfolios to offer healthier products, especially for children, including teens, and strengthen their responsible marketing policies practices to protect children's rights to healthy diets.

For Nestlé, 11% of assessed products in its portfolio were found suitable to be marketed to children, but the company derives 21% of its sales from these products, demonstrating higher sales of these products suitable to market to children. The same applies to Suntory, with a portfolio proportion of 3%, but a sales proportion of 11%. On the other hand, companies such as Kraft Heinz, Unilever, Danone and FrieslandCampina have a relatively high proportion of assessed products suitable to market to children, but the proportion of sales derived from these products is 7% lower than the respective proportion of the portfolio. Companies are encouraged, even if the profile of their products is generally considered less healthy, to increase the sales of those products that are considered healthy.

Ferrero had no products included in the assessment eligible for marketing to children at all. It is therefore essential for the company, and other companies that score lower in this section, to implement a robust marketing policy and thoroughly audit their compliance.

Figure 4. Proportion of the portfolio and sales from distinct products found suitable to be marketed to children



The total number of products included by company in the assessment is shown in parenthesis.
 Based on criteria by the WHO SEAR Nutrient Profile Model.
 * Company did not provide information to ATNI

Recommendations

To improve and accelerate their efforts to support consumers, especially children (including teens), to access healthy foods, food and beverage manufacturers are encouraged to:

- **Make a commitment not to advertise products to children (including teens) at all, or to only market foods and beverages that meet specific nutrition criteria, preferably established by independent national or international bodies (e.g. WHO Regional NPMs).**
- **Improve their product portfolios to significantly increase the number of products meeting the relevant WHO criteria.** Overall, only 9% of the assessed products of all companies meet the WHO criteria and are therefore suitable to be marketed to children.
- **Increase sale of products meeting the WHO criteria compared to products which do not.** If companies have a relatively less healthy product portfolio, they may still improve their practices in this area by increasing relative sales of healthy products compared to unhealthy products.



E Lifestyles

Supporting healthy diets and active lifestyles among employees and consumers

The Global Index 2021 assesses companies' nutrition-related commitments, practices and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories. The results of Category E, which carries 2.5% of the weight of the overall score, are presented here.

Food and beverage (F&B) manufacturers can support their staff in eating healthy diets and pursuing active lifestyles by providing employee health and wellness programs. In addition to other benefits, these programs can help facilitate a corporate culture focused on nutrition. Supportive working practices and the provision of appropriate facilities can ensure that companies support breastfeeding mothers in giving their infants the healthiest start to life. Companies can also help consumers to adopt healthy diets and active lifestyles by supporting education programs, especially by those that target groups suffering from various forms of malnutrition. This Category E assesses the extent to which companies support such efforts.

Category E consists of three criteria:

- E1 Supporting employee health and wellness
- E2 Supporting breastfeeding mothers at work
- E3 Community-supporting healthy eating and active lifestyle programs

To perform well in this Category, a company should:

- Have programs that support employee health and wellbeing, which focus on nutrition and physical activity and are open to all employees and address workers across the food supply chain.
- Disclose quantitative and/or qualitative outcomes of independent impact analysis of its health and wellness programs.
- Have parental leave policies which respect and go beyond current regulations, including paid leave of ideally six months or more and flexible working arrangements, as well as appropriate workplace facilities for all breastfeeding mothers upon their return to work.
- Publish its policy/commitment on supporting breastfeeding mothers and a commentary about how it does so.
- A commitment to support unbranded, evidence-based, and consumer-oriented programs on nutrition literacy and education, healthy eating, and active lifestyles, developed and implemented by independent organizations with relevant expertise.

Ranking on Lifestyles

E1 Employee health **E2** Breastfeeding support **E3** Consumer health

* Did not provide information to ATNI

Unilever ranks first, followed by Nestlé. These companies have adopted a range of policies to support employee/consumer wellness and are involving some of their partners and suppliers throughout the value chain. Since the Global Index 2018, where 22 of the current 25 companies were assessed, Ferrero and Arla have shown the largest improvement which, in large part, can be attributed to improved commitments to support breastfeeding mothers in the workplace.

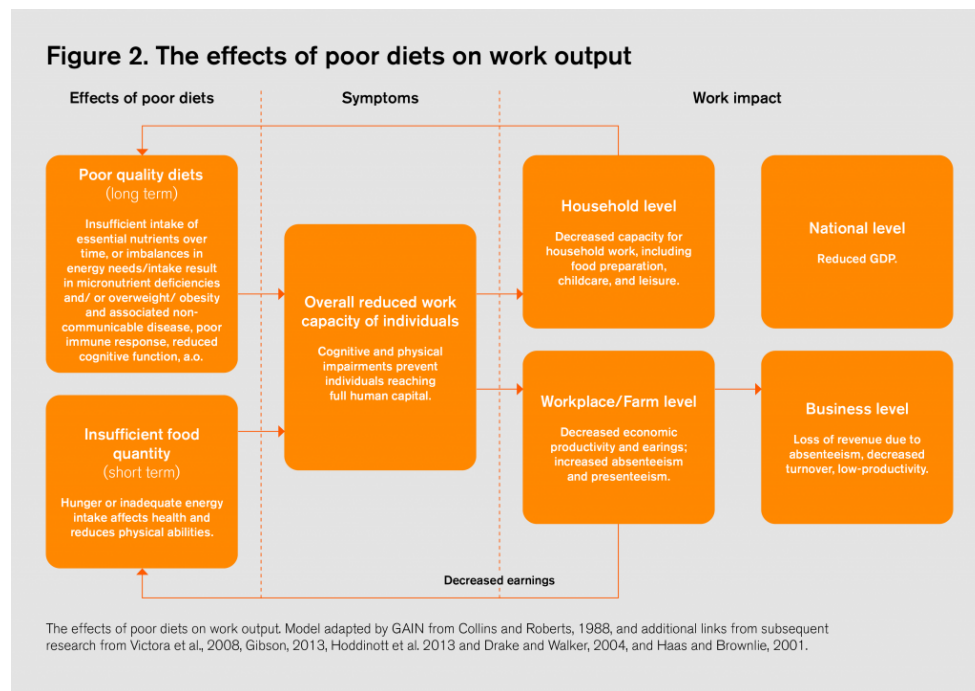
Category Context

Employee wellbeing

Workplace employee wellbeing includes all aspects of working life and is a key factor in determining an organization's long-term effectiveness. Leading companies are increasingly recognizing the need to take the wellbeing of their workers seriously.

The COVID-19 pandemic has further highlighted the importance of employee wellbeing, exposing deep-rooted labour market fragilities and structural inequalities. It has also profoundly impacted almost all aspects of work, including higher risks to occupational safety and health (OSH), reduction of working hours, or closure of business.

Nutrition is an important aspect of employee wellbeing and evidence shows that employers also benefit from effective workforce nutrition programs – as iron deficiency or low or high-body mass indices can lower work capacity or productivity, for example. Therefore, it is in the employer's interest to play an important role in improving workers' diets. often feature healthy food at work, nutrition education, nutrition-focused health checks, and/ or breastfeeding support. The Global Alliance for Improved Nutrition and the Consumer Goods Forum have launched a Workforce Nutrition Alliance (see Box 1) to drive positive change on this topic.



Supporting breastfeeding mothers at work

Breastfeeding is the ideal food for infants and one of the most effective ways to ensure child health and survival. Breastfeeding is also associated with health benefits for the mother. The World Health Organization (WHO) and the United Nations Children's Fund (UNICEF) recommend that children be exclusively breastfed for the first six months of life, after which appropriate complementary foods can be introduced alongside breastfeeding for three years or more. Longer parental leave is associated with longer duration of breastfeeding. According to Article 4(1) of ILO's Maternity Protection Convention, "a woman to whom this Convention applies shall be entitled to a period of maternity leave of not less than 14 weeks". To optimally support mothers to breastfeed exclusively for the first six months, ATNI recommends companies to match paid leave of six months or more. Companies are encouraged to establish a policy that goes beyond legal minimums and which defines a minimum arrangement across the markets they operate in (allowing for longer paid leave where legally required). Besides parental leave, companies should also facilitate flexible working arrangements, as well as appropriate workplace facilities to ensure mothers can continue breastfeeding when they return to work.

Consumer health programs

The current COVID-19 pandemic has laid bare many questions and uncertainties from consumers around nutrition and health. Companies can have a positive impact on the health of (undernourished) consumers by supporting nutrition education, although views differ on whether and how they should be involved in programs focused on promoting healthy diets and active lifestyles. Some stakeholders believe that consumer-oriented programs should only be developed and administered by independent groups with relevant expertise and without any related commercial interests. They argue that the commercial interests of companies compromise programs, who may utilize them to promote products or distract stakeholders from the marketing of less healthy products. On the other hand, some companies argue that having company-run programs is one way to demonstrate responsible corporate citizenship and that these are, in part, a response to demands to play a more active role in promoting healthy diets and active lifestyles. ATNI's methodology advises that companies should support or administer programs, as long as they do not serve as platforms for corporate, brand, or product advertisement.

Regarding efforts to address malnutrition in population groups for which this is a prevalent problem, limited consumer awareness around the benefits of highly nutritious foods has been a constraining factor. As such, companies can play a constructive role by supporting social marketing campaigns, which are an effective way of delivering messages about healthy foods to consumers at risk or suffering from malnutrition. Many international organizations, NGOs, governments, and others are active supporters of such campaigns.

Box 1. The Workforce Nutrition Alliance

The Workforce Nutrition Alliance was launched in October 2019 by the Global Alliance for Improved Nutrition (GAIN) and The Consumer Goods Forum (CGF). The Alliance helps employers set up effective workforce nutrition programs, by use of a framework. The framework is built on four pillars of good workforce nutrition programmes: 1) Healthy food at work; 2) Nutrition education, 3) Nutrition focused health checks and 4) Breastfeeding support. The Alliance brings together experts and thought leaders, and curates data and best practices. There are three overarching goals: 1) Advocate for the benefits of workforce nutrition programs to improve the livelihoods of millions of people worldwide; 2) Support employers to assess workforce nutrition programs, develop an enhancement plan and implement new programs; and 3) Monitor progress in creating successful workforce nutrition programs that support global nutrition goals.

Find out more at [Workforce Nutrition Alliance](https://www.workforcenutritionalliance.org).

Relevant changes in methodology

The underlying structure of the methodology for the Global Index 2021 has not significantly changed, but several adjustments have been made since the previous iterations to streamline it. For Category E, these include:

- The total number of indicators in Category E reduced from 34 in 2018 to 18 in 2021. In 2018, 7 of the 34 indicators in this category were non-scored, while in this iteration, all the indicators are scored.
- An indicator was added in criterion E1 to assess whether a company makes a commitment to improve the health and wellness of groups across the food supply chain (that are not direct employees) through programs focused on nutrition. In criterion E2, an indicator was introduced to assess whether a company's provision of is available in all or some of its locations. And, in criterion E3, an indicator was added to assess whether a company supports or funds programs that are adapted to the specific needs, background, and nutrition literacy levels of priority populations at risk of malnutrition.
- Company actions to prevent and address undernutrition among at-risk populations in low-income countries were assessed through a specific, separate set of 'Undernutrition' indicators in 2018. These indicators formed 25% of the overall score companies achieved. As with the rest of the Index, in 2021, such indicators are now assessed under the overarching term of 'priority populations' and integrated in the chapters. As a result of this change in the methodology, the impact of such indicators on the overall score in this thematic area has increased.

More details about the changes in the methodology can be found in the [methodology section](#) of this Index.

Key messages

- Unilever currently leads the ranking with a score of 7.6 points. It has improved its score in all the three Criteria assessed in Category E, moving up one rank in both E1 and E3.
- Ferrero and Arla showed the largest improvement, increasing their score by more than 2.5 points – which is mostly related to improved commitment and practices supporting breastfeeding mothers in the workplace. Nevertheless, Ferrero could improve by turning their commitments into a formal and comprehensive public policy for all their operations.
- Most companies (20 out of 25) make a commitment to improve the health and wellness of their employees, with programs designed to address physical health and/or nutrition.
- Aside from direct employees, only eight companies demonstrated a commitment to improving the health and wellness of groups across the wider food supply chain.
- The scope of support for breastfeeding mothers in the workplace continues to differ across countries. The majority of companies assessed do not have a global policy that is equally applied in all markets, and often commit to only follow local regulation or only provide breastfeeding facilities in their home market.
- More companies show evidence of some nutrition education and healthy diet-oriented and active lifestyle programs designed by or (co)implemented with stakeholder groups demonstrating relevant expertise. However, more should be done to ensure programs are evidence based and aligned with relevant national or international guidelines.
- The average score decreased from 3.2 in 2018 to 2.7 in 2020. Progress on developing well-designed and effective nutrition education and activity programs remains limited. Despite the need for more action to support employee health and wellbeing, especially following the COVID-19 pandemic, companies continue to show limited efforts in this area and they are strongly encouraged to increase these efforts.

General recommendations

To improve and accelerate their efforts to support healthy diets and active lifestyles among employees and consumers, food and beverage manufacturers are encouraged to:

- Increase their emphasis on improving the accessibility of their health and wellness programs, particularly on nutrition and physical activity elements, for all employees and their families globally; as well as beyond direct employees for groups across the wider food supply chain.
- Develop a global policy on support extended to breastfeeding mothers at work and support for maternal health, that applies equally in all markets – including paid leave of ideally six months or more, flexible working arrangements, and appropriate workplace facilities for all breastfeeding mothers upon their return to work.
- Particularly highlighted by increased consumer health concerns in COVID-19 times, it is crucial that companies commit to supporting unbranded, evidence-based and consumer-oriented programs on nutrition literacy and education, and healthy eating and active lifestyles, that are (co-)initiated, developed and implemented by government, knowledge institutes, or independent organizations with relevant expertise.

Noteworthy changes and best practices



Unilever's award-winning Lamplighter Program is an innovative approach to employee wellness, using health risk appraisals alongside exercise, nutrition, and mental resilience to improve employees' health and wellbeing. Aggregated review results show that the Lamplighter programs offer a high return on investment, indicating that good health really is good for business. Unilever states this program is key to addressing the top three health risks across their business: mental wellbeing; lifestyle factors (such as exercise, nutrition, smoking, obesity); and ergonomic factors (such as repetitive strain injury).

Unfortunately, during the COVID-19 pandemic, Unilever has had to run the Lamplighter program at reduced capacity. In 2020, 42 countries ran the Lamplighter employee health program, reaching around 32,000 employees, and the "Employee Assistance Program" also supported employees through the pandemic.

Unilever is one of eight companies that demonstrated a commitment to improving the health and wellness of groups across the wider food supply chain. These groups are not direct employees (such as smallholder farmers, factory workers, and small scale vendors). The company's partnership in the 'Seeds of Prosperity', with GAIN and the Sustainable Trade Initiative (IDH), is helping tea workers and their families improve their health and wellbeing through more nutritious, diverse diets. The findings of this program will be utilized by all three groups to develop the next generation of workplace nutrition programs, with the aim of developing an approach which can be adapted to suit different businesses and contexts.

ATNI strongly encourages other food and beverage manufacturers to step up their efforts in this field.



In December 2019, Nestlé introduced its new "Global Parental Support Policy". This policy promotes a gender-neutral approach, recognizing the diversity in family structures, and acknowledges that responsibilities in caring for a child are often shared by a . Therefore, the minimum standards set in this policy are based on caregiver status, regardless of gender, and this is considered an industry-leading practice.

The Nestlé Global Parental Support Policy specifically promotes: 1) Paid leave for primary and secondary caregivers; 2) Employment protection and non-discrimination; 3) Health protection in the workplace; 4) A conducive work environment to breastfeed; and 5) Flexible work arrangements. The policy outlines a new minimum of 18 weeks' leave for primary caregivers, with at least four weeks for secondary caregivers. Furthermore, it requires breastfeeding rooms in all locations with at least 50 total employees, whilst previously, this was in locations with more than 50 female employees.



In 2018, as part of a multi-year, \$50 million commitment to promote healthy lifestyles and address obesity, The Mondelēz International Foundation (MIF) launched "Healthy Lifestyle Community Programs", covering 10 countries. Mondelēz International is working with partners to address health concerns for at-risk children through a three-pronged approach: 1) offering nutrition education; 2) promoting active play; and 3) providing access to fresh foods. In India, Mexico and Australia, for example, The Mondelēz International Foundation has teamed up with Save the Children to implement such programs. In India, Save the Children and Magic Bus are jointly promoting nutrition education, active play (including sports development), and growing fresh foods for around 50,000 children and families across the country.

E1 Supporting employee health and wellness

Have companies improved their commitments to employee health and wellness (H&W) through a program focused on nutrition, diet and physical activity?

Since 2018, corporate commitments to support employee health and wellness have increased slightly. Most companies (20 out of 25) make some commitment to improve the health and wellness of their employees with programs designed to address physical health and/or nutrition. Of these, seven make a global commitment. However, only three out of 25 companies, namely Grupo Bimbo, Nestlé and Unilever, make a public commitment to support employee health and wellness through a program focused on nutrition and physical activity, which includes meaningful expected outcomes. Meaningful expected outcomes must be quantifiable, but can be defined in various ways: e.g. by defining expected outcomes related to healthy behavior, health-related outcomes, or outcomes related to employee absenteeism.

Unilever leads the ranking on Criterion E1, with 8.5 points, followed by Nestlé. Both companies offer a comprehensive and accessible employee health and wellness program that includes nutrition components. For example, Unilever has established a “Wellbeing Framework”, which addresses physical, mental, emotional, and purposeful wellbeing. The company developed its Lamplighted employee program in 2001, which aims to improve the physical health, exercise, nutrition and mental resilience of its workforce, in all countries with 100 or more employees.

Ajinomoto and Kraft Heinz show the largest improvement compared to the 2018 Index. For both companies, several initiatives have been taken to improve the health and wellbeing of its employees at organization and interpersonal levels, and include individual elements. Ajinomoto offers the “A-Health Solution program” to support the self-care of its Ajinomoto Group employees through a focus on health status monitoring and lifestyle disease prevention. Meanwhile, Kraft Heinz launched a “LiveWell” health and wellness program in the U.S. following a successful Canadian campaign. The aim is to continue to expand this program globally through a portfolio of available benefits, such as biometric screenings, physical and step challenges, yoga classes, and nutritious/healthy eating options.

The scope of the health and wellness programs varies considerably: the programs are available to all employees at just 10 companies, while four companies also make these programs available for all family members. Only eight companies demonstrated a commitment to improving the health and wellness of groups across the wider food supply chain that are not employees (such as smallholder farmers, factory workers, and small scale vendors). An example from such a program is the Seeds of Prosperity, a Unilever partnership with GAIN and the Sustainable Trade Initiative (IDH), helping tea workers and their families improve their health and wellbeing through more nutritious, diverse diets. The findings of this program will be utilized by all three groups to develop the next generation of workplace nutrition programs, with the aim of developing an approach which can be adapted to suit different businesses and contexts.

Table 1. Company commitments for programs supporting employee health and wellness

	Company has program to support employees (nutrition/physical activity)				Company ensures availability of program to all employees (all/some)	Evaluation of program	Company has program to support wider value chain
	With a focus on nutrition	With a focus on physical activity	Including meaningful expected outcomes for both nutrition and physical activity	Scope of commitment			
Ajinomoto	✓	✓		Major markets only	All	Independent assessment	
Arla		✓*		Major markets only	Some		
BRF*	✓+	✓*	Only for nutrition	Home market only	Some		✗
Campbell		✓		Not disclosed			
Coca-Cola				Not disclosed	Some	Internal	✗
Conagra				Not disclosed			
Danone	✓	✓		Globally	Some		✗
Ferrero	✓+	✓		Home market only	All		✗
FrieslandCampina	✓	✓		Home market only	All	Independent assessment	
General Mills	✓	✓		Home market only	Some		
Grupo Bimbo	✓	✓	✓	Globally	Some	Internal	✗
Keurig Dr Pepper		✓		Not disclosed	Some		Yes, but it does not include expected outcomes
Kellogg	✓	✓		Globally	All		Yes, but it does not include expected outcomes
Kraft Heinz	✓+	✓*		Major markets only	Some		
Lactalis*				Not disclosed			
Mars	✓	✓	Only for nutrition	Globally	All	Internal	Yes, but it does not include expected outcomes
Meiji	✓+	✓*		Home market only	All	Independent assessment	✗
Mengniu*				Not disclosed			
Mondelēz	✓	✓		Globally	All		Yes, but it does not include expected outcomes
Nestlé	✓	✓	✓	Globally	All	Independent assessment	✓
PepsiCo	✓	✓		Major markets only	Some	Internal	Yes, but it does not include expected outcomes
Suntory*		✓*		Home market only	Some		
Tingyi*		✓		Home market only	All		Yes, but it does not include expected outcomes
Unilever	✓	✓	✓	Globally	All	Independent assessment	✓
Yili*				Not disclosed			

✓ Yes
 ✗ No
 * New commitment compared to Global Index 2018
 * Company did not provide information to ATNI
 Blank spaces = no commitment or no information

Do companies increasingly conduct independent evaluations of the health impact of their H&W programs?

Nine companies report that they conduct some form of evaluation of their employee wellness programs. However, only five of these – Ajinomoto, FrieslandCampina, Meiji, Nestlé and Unilever – have adopted the best practice of commissioning independent evaluations by a third-party. These are also the only five companies that publish a summary evaluation. No companies publish an independent evaluation of their wellness programs in full. Considering the importance of H&W for employee wellbeing, as well as for workers in the wider supply chain, companies can do a lot more to assess whether their programs are delivering real health outcomes.

Recommendations E1

To improve and accelerate their efforts to support healthy diets and active lifestyles among employees, food and beverage manufacturers are encouraged to:

- Increase their emphasis on improving the accessibility of their health and wellness programs, particularly on nutrition and physical activity elements that are accessible to all employees and their families globally.
- Define meaningful, quantifiable expected outcomes for their health and wellness programs, for example, by defining expected outcomes related to healthy behavior, health-related outcomes, or outcomes related to employee absenteeism.
- Make a commitment to improving the health and wellness of groups across the wider food supply chain and beyond direct employees.

- Implement robust impact assessment tools and monitoring mechanisms for employee health and wellness programs, regulated by a third-party independent evaluator.
- Improve transparency by publishing an independent evaluation of their wellness programs in full.

E2 Supporting breastfeeding mothers at work

Have companies improved support for breastfeeding mothers and maternal health in the workplace?

Overall, the average score in this Criterion E2 remains approximately the same (3.0 out of 10). Since 2018, more companies (18 in total) now commit to allowing parents to take paid parental leave, and to providing breastfeeding mothers with appropriate working conditions and facilities at work. However, only five do so in a formal policy for both parental leave and appropriate working conditions and facilities for breastfeeding mothers.

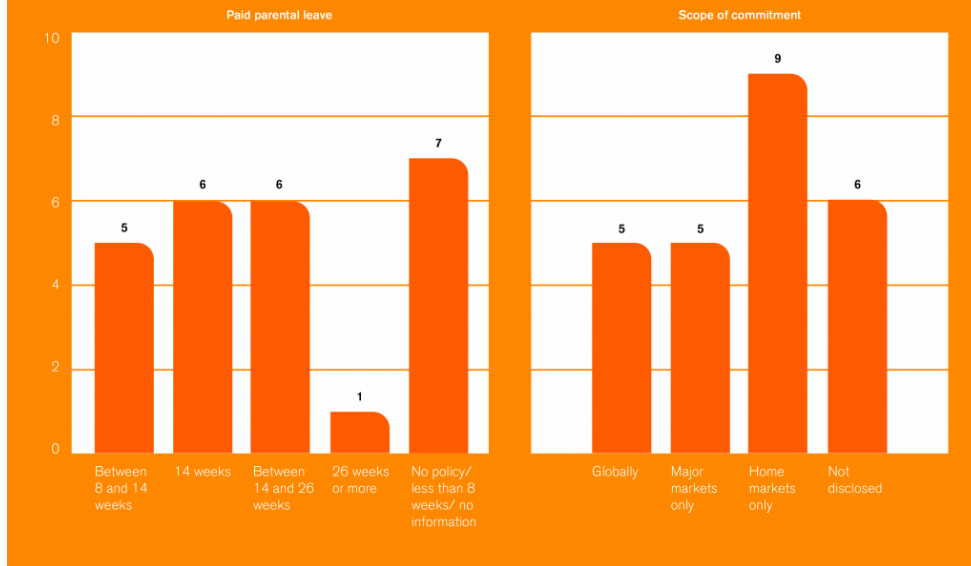
Companies with a new commitment include Arla, Ferrero, Keurig Dr Pepper (first time assessed in this iteration), and Suntory. Arla and Ferrero have made the biggest improvements, and made commitments to a minimum parental leave of 14 weeks, in line with ILO recommendations. Arla has implemented the Arla Foods Parental Policy, which establishes minimum standards that must be implemented at the Arla Group workplaces across the world by the end of 2021. Ferrero could further improve by including their commitments in a comprehensive public policy for all of their operations.

Nestlé leads the E2 ranking with 9.4 points, as in the 2018 Global Index. The company introduced the “Nestlé Global Parental Support Policy” in December 2019, offering further improvements. The policy outlines a new minimum of 18 weeks’ leave for primary caregivers, regardless of gender, with at least four weeks for secondary caregivers. Furthermore, it requires breastfeeding rooms in all locations with at least 50 employees in total, while previously, this was in locations with more than 50 female employees.

Unilever (8.8 out of 10) and Danone (8.1) rank second and third respectively in supporting breastfeeding mothers at work. Both companies have strengthened their policies and public disclosure. Unilever has been increasing the availability of breastfeeding facilities and ensuring nursing mothers have two 30-minute breaks in the day. The company has also been enabling sites with over 50 female employees to provide access to crèche services that are tailored to local needs.

BRF is the only company that offers 26 weeks of paid parental leave (home market only). The company follows the local legislation regarding maternity and paternity leave in Brazil, adhering to the rules of the “Programa Empresa Cidadã”, which extends maternity and paternity leave up to 180 days (six months). Six companies offer between 14 and 26 weeks, six companies offer 14 weeks, and another five companies offer between eight and 14 weeks’ paid parental leave. Seven companies didn’t provide information, don’t have a policy on this, or have paid leave of eight weeks or less. This indicates there is much more opportunity for companies to take a leading role in extending parental leave in support of infant and parent health.

Figure 4. Company policies on paid parental leave



The majority of the companies assessed do not have a global policy to support breastfeeding mothers in the workplace that is equally applied in all markets, and often commit to only follow local regulation or only provide breastfeeding facilities in their home market. 15 out of 25 companies provide private, hygienic, safe rooms for expressing breastmilk. 13 out of the 25 companies assessed explicitly provide fridges for storing breastmilk, and 14 offer breaks to express breastmilk. Only four companies offer these breastfeeding facilities globally. See more details in Table 2.

Table 2. Company maternity commitments and facilities

	Company provides private, hygienic rooms	Company provides fridges to store breastmilk	Company provides breaks to express breastmilk	Company provides other functional or flexible working arrangements	Level of commitment
Ajinomoto	✓	✓	✓	✓	Major markets only
Arla	✓*		✓*	✓	Major markets only
BRF*					Not disclosed
Campbell	✓	✓	✓	✓	Home market only
Coca-Cola	✓	✓		✓	Home market only
Conagra					Not disclosed
Danone	✓	✓	✓	✓	Globally
Ferrero	✓*	✓*	✓*	✓*	Globally
FrieslandCampina	✓	✓*	✓		Home market only
General Mills	✓	✓			Home market only
Grupo Bimbo	✓	✓	✓	✓	Major markets only
Keurig Dr Pepper					Not disclosed
Kellogg	✓	✓	✓	✓	Not disclosed
Kraft Heinz	✓	✓	✓	✓	Major markets only
Lactalis*					Not disclosed
Mars	✓	✓	✓		Not disclosed
Meiji					Home market only
Mengniu*					Not disclosed
Mondelēz					Major markets only
Nestlé	✓	✓	✓	✓	Globally
PepsiCo	✓		✓	✓	Major markets only
Suntory*				✓	Home market only
Tingyi*				✓	Not disclosed
Unilever	✓	✓	✓	✓	Globally
Yili*			✓		Home market only

* New commitment compared to Global Index 2018
 * Company did not provide information to ATNI

Only Danone, Nestlé and Unilever have a global policy that goes beyond local legislation and offers paid maternity leave between three and six months, as well as standard facilities in all their markets globally. Therefore, it is suggested that the other companies should enhance their support of breastfeeding mothers at work.

Did companies improve their public reporting on supporting breastfeeding mothers in the workplace?

Only seven companies publicly report on commitments to allow parents to take paid parental leave, and to provide breastfeeding mothers with appropriate working conditions and facilities at work. Arla, Danone and Nestlé are the only companies that share a full parental policy in the public domain. Compared with the Indexes in 2016 and 2018, companies again disclose some more information in this area, although disclosure remains limited overall. For example, PepsiCo has an updated Employee Well-Being webpage which specifies the company's facilities for nursing mothers. It states: "In a number of our locations globally, we have also worked to provide facilities for nursing mothers. In more than half of our locations worldwide with 500 or more employees, we have either dedicated mothers' rooms, wellness rooms, or alternate space available for nursing mothers. We are actively working to expand the number of PepsiCo locations with facilities for nursing mothers in the coming years."

Recommendations E2

To improve and accelerate their efforts to support breastfeeding mothers at work, food and beverage manufacturers are encouraged to:

- Develop a global policy on support extended to breastfeeding mothers at work and support to maternal health, that applies equally in all markets.
- Increase transparency about the support extended to breastfeeding mothers at work and support to maternal health, by making the policy publicly available.
- Extend parental leave policies to go beyond current national regulations, including paid leave of ideally six months or more.
- Expand currently limited arrangements to support breastfeeding mothers to: 1) provide private, hygienic, safe rooms for expressing breastmilk; 2) allow breastfeeding mothers breaks to express breastmilk; and 3) offer flexible working arrangements to support breastfeeding mothers.
- Expand commitment to support breastfeeding mothers to all locations with over 50 employees, regardless of gender.

E3 Community-supporting healthy eating and active lifestyle programs

Which companies lead the ranking on supporting consumer-oriented healthy diets and active lifestyle programs?

Like in the previous Global Index, Mondelēz is the company with the most extensive consumer lifestyle programs. FrieslandCampina and Unilever follow, having both improved their scores significantly compared to 2018. These companies show leading practices in different areas: For example, by funding programs that are evidence-based and (co)implemented with stakeholder groups with relevant expertise, excluding product branding and adapted to the needs of specific groups.

Is there evidence that companies commit to and support good, independently-designed nutrition literacy and education, and healthy diet-oriented and active lifestyle programs?

Only 11 out of the 25 companies assessed commit to, or demonstrate, that some of their healthy eating and active lifestyle programs exclude product or brand-level branding. FrieslandCampina is the only company that demonstrates that all programs exclude product or brand-level branding. On their website, it is stated: "...there are no product names mentioned and there are no visuals of FrieslandCampina products on our communication and educational tools". The company offers a variety of examples of supporting educational programs about healthy nutrition, such as the "Drink. Move. BeStrong campaign", which assisted parents and teachers in creating awareness among children of the need to exercise sufficiently indoors and outdoors, eat responsibly, and live a healthy life.

Only two companies – Mondelēz and Danone – commit to, or demonstrate, that all of their programs are evidence-based and aligned with relevant national or international guidelines. Another 12 companies commit to, or demonstrate, that some of their programs are evidence-based and aligned with relevant national or international guidelines. The Mondelēz International Foundation, the company's philanthropic arm, funds community programs offering nutrition education, promoting active play, and providing access to fresh foods. All of their community programs are based on a Private-Public Partnership model that is endorsed by the National Academy of Medicine (NAM – formerly known as the Institute of Medicine, United States), the WHO and the World Bank.

In total, 20 companies show evidence of some programs funded, designed by or (co)implemented with stakeholder groups with relevant expertise, a considerable improvement compared to the previous iteration. This implies that companies have stepped up their efforts in supporting consumer-oriented information and programs for better nutrition and healthy lifestyles. Of these 20 companies, 14 also aim to adapt to specific needs, background, and nutrition literacy levels of specific groups at risk of micronutrient deficiencies. There are five companies – ConAgra, FrieslandCampina, General Mills, Mondelēz and Unilever, that only fund programs which are designed by and/or (co)implemented with diverse stakeholder groups with relevant expertise. Unilever, for example, has a variety of consumer-oriented health/nutrition education programs in both low income and low-and-middle income settings. For their Green Food Steps programme in Nigeria, Lutong Nanay in the Philippines and Nutri Menu programme in Indonesia, Unilever is working with local partners to help consumers eat healthier.

Do companies disclose more information about their support of consumer-oriented educational programs?

14 companies have a description of their nutrition education/nutrition literacy and healthy diet-oriented/active lifestyle programs on their website. Five companies disclose that their programs are required to be evidence-based and aligned with relevant national or international guidelines. Only three companies have a document that sets out their policy on brand-level branding: FrieslandCampina, Mars and Mondelēz.

Table 3. Supporting consumer-oriented healthy eating and active lifestyle programs

	Company excludes branding from program	Company programs are evidence-based and aligned with relevant national or international guidelines	Programs funded by company are designed by or (co)implemented with stakeholder groups with relevant expertise	Company programs are adapted to at-risk groups and designed by and/or (co)implemented with groups with relevant expertise and strong leadership in the process	Evaluation of programs by independent groups with relevant expertise
Ajinomoto	●	●	●	●	●
Arla	●	●	●		●
BRF*		●	●		★
Campbell					
Coca-Cola					✘
Conagra			■	■	
Danone	●	■	●	▲	●
Ferrero	●	●	●	●	●
FrieslandCampina	■	●	■	●	●
General Mills		●	■	●	●
Grupo Bimbo		●	▲		✘
Keurig Dr Pepper	●		●	●	
Kellogg		●	▲	▲	★
Kraft Heinz	●	●	●	▲	
Lactalis*					
Mars			▲		●
Meiji			●	▲	
Mengniu*					
Mondelēz	●	■	■	■	●
Nestlé	●	●	●	●	●
PepsiCo	●	●	●	■	●
Suntory*					
Tingyi*			▲		
Unilever	●	●	■	●	●
Yili*					

■ All programs;
 ● Some programs;
 ▲ Only its own programs;
 ★ Evaluated by the company itself;
 ✘ No evaluations are performed
 * Company did not provide information to ATNI

Recommendations E3

To improve and accelerate their efforts to support healthy diets and active lifestyles among consumers, food and beverage manufacturers are encouraged to:

- Develop a policy that excludes brand-level sponsorship of consumer orientated programs and/ or increase transparency to show how the company ensures consumers will receive independent, evidence-based information.
- Ensure consumer-oriented healthy eating and active lifestyle programs are evidence based and aligned with relevant national or international guidelines.
- Support programs that are developed and (co-)implemented by independent third-parties with relevant expertise, such as governments and knowledge institutes.

- Commission independent evaluations of these programs and publicly disclose the results.
- Further expand the positive impact they can have on the health of (undernourished) consumers by supporting programs that are adapted to the specific needs, background and nutrition literacy levels of groups at risk of micronutrient deficiencies.



Labeling

Product Labeling and Use of Health and Nutrition Claims

The Global Index 2021 assesses companies' nutrition-related commitments, practices, and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable, accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories. This category presents the results of Category F Product Labeling and use of health and nutrition claims, which carries 10% of the weight of the overall score of the Corporate Profile methodology.

One important means of promoting healthy diets, and addressing obesity and undernutrition, is to provide consumers with accurate, comprehensive, and readily understandable information about the nutritional composition and potential health benefits of what they eat. This can promote better nutrition by helping consumers choose appropriate products to manage their weight and assist in preventing or addressing diet-related chronic disease, as well as raise awareness of products that will target micronutrient deficiencies.

This category assesses companies' approaches to product labeling and use of health and nutrition claims, particularly with respect to the consistency of their application across product portfolios and in different markets, and accordance with international standards.

Category F consists of two criteria:

F1 Nutrition Labeling

F2 Health and Nutrition claims

To perform well in this category, a company should:

- Adopt, publish, and fully implement a global policy on nutrition labeling that commits to provide information on all key nutrients in a way that is easy for consumers to understand. This includes information on portion size and nutrients as percentages of Daily Values (or equivalent) displayed appropriately in nutrition information panels on the back of packs and in interpretive format on the front of packs.
- Disclose the degree to which full labeling policy is implemented, at the level of markets with full roll-out.
- Define a labeling strategy and targets aimed at reducing food waste and provide examples.
- Adopt and publish a global policy on the use of health and nutrition claims that states that, in countries where no national regulatory system exists, such claims will only be placed on products if they are in full compliance with the relevant Codex standard.
- Adopt and publish a global policy on labeling that includes commitments to use nutrition or health claims on fortified products only when they meet relevant Codex standards and the WHO/FAO Guidelines on Food Fortification with Micronutrients.

Ranking on Labeling

Unilever takes first place in the rankings with an improved score of 8.5, rising three places since 2018. It is followed by Nestlé (8.4) and Mondelez (7.0) in second and third positions. Arla (increasing from 2.5 to 6.2) and PepsiCo (increasing from 2.6 to 6.1) show the most improvement in their ranks.

F1 Product labeling **F2** Claims

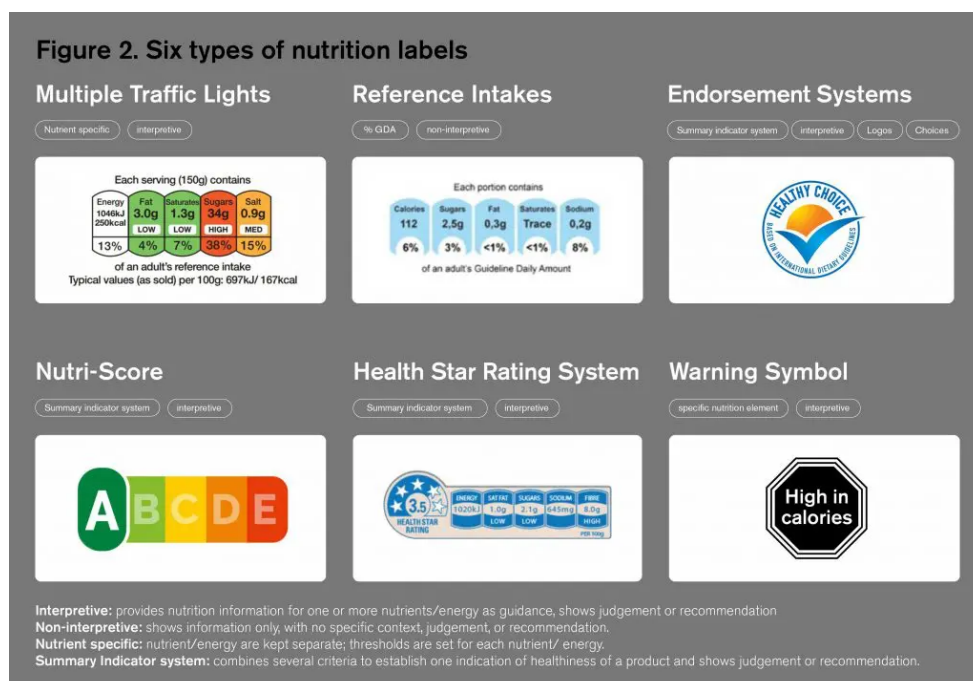
* Did not provide information to ATNI

Category Context

Labeling is used on the packaging of food and beverage products to inform consumers about the nutritional composition of its contents, the product's expiration date, and any additional health or nutritional messages, among others. It is of high importance that labels are presented in a format that consumers readily understand, and that confusion is avoided. Consumer research shows product labeling is highly appreciated and plays an important role in product choice, particularly in making healthier decisions and comparing the healthiness of products. The outbreak of the Covid-19 pandemic has seen a shift in product purchase as consumers have become more aware of their own health and wellness and seek healthier products. At the same time, the rise in e-commerce grocery shopping has accelerated the need for accurate online nutrition labeling and stronger regulations, to avoid the sharing of misinformation and monitor the use of health claim.

The nutritional content of the product is normally displayed in a table format **back-of-pack (BOP)** and includes information on nutrients, total energy, calories, salt and, depending on regulations, ingredients and the quantities of vitamins and minerals. Based on WHO/ FAO guidelines, it has been recommended recently that fiber and added sugars are also included to further highlight a product's health credentials. Added sugars increase the level of energy (calories) in a product, while fiber aids in maintaining a healthy digestive tract.

Regarding **front-of-pack (FOP)** labeling research shows that interpretive labels, that include guidance or judgement on the healthiness of a product, are easier for consumers to understand than numeric labels that only provide quantitative information. Interpretive labels can help consumers better understand the nutrition content of products and make more informed healthy choices. The information is normally displayed in a format on the FOP that helps convey information to the consumer in a faster, unambiguous way. Examples of formats include color coded labels (e.g., traffic light system), grading labels, and warning labels (See Figure 2 and Box 1 below). In several countries, voluntary or mandatory FOP labeling schemes are in place, and research shows that around 30 countries have adopted one. Australia and New Zealand have developed their own government-endorsed system called the Health Star Rating (HSR) to help consumers choose foods that are higher in positive nutrients and lower in negative nutrients linked to obesity and diet-related chronic diseases (see Figure 2 and Box 1 below). This is the system ATNI uses for the independent product profile assessment, which is also part of this Global Index and shown in section B of this Index.



The use of one mandatory global labeling system has been discussed for many years, but no consensus has been reached about which system is the most effective. The European Union has been working on a harmonized system, and some food and beverage companies are supporting this. For example, France's Nutri-Score, an independent, government-endorsed system introduced in 2017, conveys nutritional information via a colorful letter-based grading scale in the FOP. Six additional EU countries have already decided in favor of using the Nutri-Score system (See Figure 2 and Box 1 below).

Aside from this, regulations regarding labeling are important to protect the consumer and encourage fair practice in the food trade. They provide consumers with correct information on nutrition and shelf life, and guidance on product use. They also encourage manufacturers to formulate products of higher nutritional quality. Although a consensus on mandatory regulations has not been met, the Codex Alimentarius Guideline CAC/GL 2-1985 (set out by WHO/FAO1), was developed as a voluntary international standard and guideline, and set a precedent for food and beverages companies to follow. ATNI uses Codex as a framework and bases part of its assessment on companies' commitment to follow these guidelines at a global level, in addition adhering to their own internal and industry regulations. The 2021 Index also assesses the degree to which companies confirm and disclose their approach to implementing these regulations. Guidelines for the use of nutrition and health claims are also set out by Codex CAC/GL 23-1997, and state that nutrition claims should be consistent with national policy in support of public health. Only nutrition claims that support national nutrition policy should be allowed.

As well as aiding consumers in decision making around health, labeling assists in reducing food loss and waste (FLW) by providing consumers with information on shelf life and how to use and store the product correctly. FLW is an important sustainability goal that links closely with access to nutrition, undernutrition, and the right to food. The less FLW there is, the greater the supply of food; which evidently impacts consumers' access to nutrition. Food and beverage companies can prevent and reduce FLW in the production process, such as during the stages of the food chain in which they have most decision-making power: agricultural production, post-harvest handling and storage, and processing — downstream stages are not considered.

In this Category, ATNI assesses the food and beverage manufactures on their commitments, practices, and transparency regarding labeling, alongside the appropriate use of health and nutrition claims. ATNI uses tools to assess companies' use of FLW tracking and prevention tools in their management systems.

Box 1. Overview of most used front of pack nutrition labels

Using interpretive FOP labeling that includes a qualification or recommendation on the healthiness of the food (e.g., by using color-coding, a traffic light system or a star or similar rating system) to convey the healthiness of a product is an effective method of informing consumers in a quick and easy to understand format. Six worldwide examples are shown in Figure 2.

Multiple traffic lights: The traffic light system was initially introduced by the UK Government in 2013 but it is currently a voluntary requirement for manufacturers under the Food Information Regulation. The traffic light labeling system informs consumers whether a product has high, medium, or low amounts of fat, saturated fat, sugars, and salt. Red implies that the product is high in a negative nutrient and should be eaten sparingly. Amber implies medium. The product should be eaten in moderation. Green means low. The greener the light a label displays, the healthier the food choice is. Reference Intake is shown in percentages.

Reference Intakes: This label shows the percentage of nutrients in a product that meets the Daily Reference Intake on a "per portion basis" and provides information on the amount of fat, saturates, sugars, and salts the product adds to a person's daily recommended intake. This labeling system is mostly used in the European Union.

Endorsement systems: The choice logo is a positive front-of-pack logo for food and beverage products and is the single food choice logo for The Netherlands. It considers the level of saturated fatty acids, trans fatty acids, added sugars, salt, and fiber, as compared with similar products within its category. Compared to a standard nutrition claim, which only refers to the amount of energy or of one single nutrient, it is a single statement about several nutrients. The healthy choice logo was developed by the Choices International Foundation and the Netherlands was the first country to authorize the Choices logo in 2006.

Health Star Rating system labels (HSR): This is a front-of-pack labeling system developed and government endorsed in Australia and New Zealand. It rates the overall nutritional profile of packaged food and assigns it a rating from half a star to 5 stars. The more stars, the healthier the choice.

Nutri-Score: The Nutri-Score, developed and government-endorsed in France, is a nutrition label that converts the nutritional value of products into a simple code consisting of 5 letters, each with its own color. Each product is awarded a score based on a scientific algorithm. This formula includes nutrients to limit (energy value and the quantity of sugars, saturated fats, and salt) and nutrients to increase (fiber, protein, fruit, vegetables and nuts, rapeseed oil, walnut oil, and olive oil).

Warning Systems: This is in the form of a black and white logo in the shape of a hexagon or octagon. It is used to highlight products with high content of energy, sugar, saturated fat, and sodium. The use of this warning label was implemented in Chile in June 2016 as part of the Chilean Food Labeling and Marketing Law.

Relevant changes in methodology

The underlying structure of the methodology for the Global Index 2021 has not significantly changed. Only some adjustments have been made to streamline it since the previous iterations of the Global Index. For Category F, these include:

- In 2018, the weight of Category F in the overall corporate profile score was 15%, whereas in this index it is 10%. This is because the independent product profile assessment is now included in the overall scoring algorithm and received a higher weighting.
- The scope of assessing FOP labeling commitments has evolved. Companies are now assessed on their commitments to not use any additional interpretive labeling on products which may confuse consumers or modify the effect of the mandatory labeling in countries where mandatory FOP labeling systems are not adopted. This includes the use of health warning labels.
- The scope of criterion F1 has expanded to include food loss and waste (FLW) indicators. Companies are assessed on their labeling strategies and targets aimed at reducing food waste and encouraged to disclose examples of this.
- In addition to assessing the appropriate use of claims (compliance with local or national guidelines), this category also looks at whether companies are using health and nutrition claims on products that are defined as healthy by a relevant Nutrient Profiling Models (NPM). Companies score highest when using a government-endorsed NPM.
- This category specifically assesses and scores companies on the percentage of products that companies provide nutrition information online for, accounting for country-specific differences in product compositions. Answer options range from less than 10% to more than 90% of products.

More details about the changes in the methodology can be found in the [methodology section](#) of this Index.

Key Findings

- The average score for companies in Category F is 3.6 (shown in the first figure) which is slightly lower than in 2018 (3.8). This iteration of the index has seen the incorporation of new indicators (using an NPM prior to placing health claims and assessing FLW commitments), whereby some companies have not made explicit commitments.
- Unilever leads the rankings with a score of 8.5, improving their score and rising three places since 2018. This is a result of its strong FOP and BOP labeling commitments, adherence to international guidelines, and transparency levels. Nestlé follows second and achieved the highest score in 'health and nutrition claims' adhering to Codex guidelines for product claims and the use of the company specific NPM.
- In 2018, no companies used interpretive labeling on products which helps consumers with a qualification of the nutritional value of products. The Global Index 2021 shows that Danone, FrieslandCampina and Nestlé have introduced a system of interpretive labeling on all products, globally. Three more companies have introduced this for some products (Unilever, Kellogg, and Arla).
- Arla has shown the greatest improvement, increasing in the rankings from 13 to six out of 25. This is mostly due to new commitments and policies in place on the use of nutrition and health claims. In addition, Arla commits to displaying nutritional information both FOP and BOP and has introduced government-endorsed interpretive labeling on some of its products (see Table 1).
- In 2018, as part of FrieslandCampina's nutrition labeling commitments, the company defined an objective to include the reference intake or guideline daily amount (GDA) energy icon on 100% of its relevant consumer packaging by 2020. The company has achieved its goal by introducing government-endorsed nutritional interpretive labeling on all its products globally, rather than following a numeric-only format. The company publishes its performance against this objective on its corporate website.
- Companies have made an improvement in labeling energy levels. Fifteen out of 25 companies now commit to labeling amounts of energy or nutrients on a per 100g or per 100ml basis and/or per serving or per portion size, compared to just nine out of 22 in 2018.
- Mars, Grupo Bimbo and Ferrero all see a decline in their overall scores since 2018. One reason is these companies do not use their own nutrition criteria and/or Codex standards to prevent health and nutrition claims being placed on unhealthy products. They also have lower standards and targets than their peers when it comes to linking their labeling strategy to FLW programs.
- Table 2 shows companies apply their BOP labeling commitments to more products and are a larger part of the markets in which they are active compared to 2018. However, the number of companies disclosing their overall BOP and FOP labeling commitments has not improved.
- While the majority of companies commit to follow Codex Guidelines in BOP labeling of nutrients, only six go beyond general Codex guidelines and commit to show dietary fiber. No companies have committed to display added sugars on their BOP labels. ATNI includes these in the assessment as many countries' national dietary guidelines classify added sugar and fiber as relevant for public health.

General Recommendations

To accelerate and improve their commitments, strategies, and actions on labeling and nutrition and health claims, ATNI encourages food and beverage manufacturers to consider the following recommendations:

- **Commit to provide comprehensive nutrition label information globally.** To compensate for differences in the strength of local regulations around the world, companies should commit to provide comprehensive nutrition information on all product labels in all countries, while respecting the relevant regulatory frameworks and legal requirements.
- **Improve commitments to display nutritional information BOP including added sugars, fiber, and micronutrient content.** The purpose of showing nutrients contained in the food is to enable consumers to make informed choices and encourage them to choose healthier options. At a minimum, companies should follow the Codex, and consider displaying fiber and added sugars, as well as micronutrient information where relevant.
- **Commit to provide interpretive FOP labeling globally.** Interpretive FOP labeling provides an opportunity to quickly inform consumers about the healthiness of products and help them make conscious choices. Companies should make use of existing systems that are endorsed by local policymakers as much as possible. Industry associations could play a role in harnessing and coordinating company commitments and efforts.
- **Commit not to use additional labeling on products that distracts consumers from mandatory health and nutrition labels.** Companies showed a lack of commitment to not use additional interpretive labeling that might confuse consumers and take away from or modify the effect of mandatory health warning labels in countries.
- **Ensure that health and nutrition claims are only used for healthy products (NPM).** ATNI believes health and nutrition claims should only be used for products that are healthy, as defined by the companies' own published criteria (preferably using the same standards of a government-endorsed model). This includes the use of claims on foods fortified with micronutrients (see box 6).
- **Show which industry wide labeling commitment they pledge to via own communications channels.** Companies should be transparent and communicate on their websites if they pledge to industry associations' nutrition labeling commitments and highlight what they entail.

Noteworthy changes and best practices



Danone has extensive product labeling commitments to the use of both FOP and BOP labeling on its products. The company commits to displaying nutrition information online, accounting for country-specific differences in product compositions for all their products, globally. Displaying nutritional information for all products online shows transparency and enables consumers to check the nutritional content of products across the company's portfolio in all markets.



Nestlé is the only company that commits to not use Nutrition and Health Claims in countries where local or national regulations are less strict than Codex Alimentarius Guidelines. Codex guidelines are international food standards, codes of practice, and recommendations established to protect the health of the consumers and to ensure fair practices by 188 member countries. The company is the only one that has a public commitment to use interpretive labeling on its products, globally.

Nestlé's Claims Policy

Nestlé published its Claims Policy in 2016, in which includes a framework that extensively covers health and nutrition claims used in consumer communication. Beyond referring to their alignment with Codex standards, the company states that:

1. All claims must be compliant with local regulations or, where they do not exist, with Codex in addition to Nestlé governance rules and procedures.
2. Claims must be substantiated. Specifically for health claims on food and beverages, the Nestlé Health Claims Panel, a central committee of internal experts, assesses whether the scientific substantiation follows Codex Alimentarius Standards.

In addition, for products carrying a health claim, linking it to the definitions of healthy products as defined in its NPM:

1. Nutrition information labeling is mandatory.
2. The Nestlé Nutritional Foundation criteria as defined by the Nestlé Nutritional Profiling System must be met.
3. A statement about the importance of a balanced diet and a healthy lifestyle must be included in the labeling.

In addition, the company states that the policy applies globally and with the explicit scope to cover all products sold under brands owned by the company that carry a claim, including products sold by joint ventures and license partners.





F

On its global website Unilever in 2017, signed a CGF commitment to switch to standardized food expiry dates by 2020. The aim of this commitment is to tackle food waste by avoiding the confusion around date labels that often causes people to throw away good food. The company states "We're also using our brands to reach consumers – and helping them cut waste through great products and innovative ideas".

The company has started an initiative developed in collaboration with the Too Good To Go partnership and industry players, which aims to reduce food waste at the consumer level. They are piloting a new method of date labeling in Denmark and Germany which involves placing a new packaging label directly after the 'best before' text on certain food products.

The new product labels will now read as: "**Best before 'date', 'often good after 'date'**". The intention with initiatives such as this is to encourage consumers to take the second label information as guidance that the product may still be edible beyond its predetermined 'best before' shelf-life date.

Unilever's Position on Nutrition and Health Claims

Unilever's position on the use of health and nutrition claims is to provide consumers with "relevant and concise nutrition information about products to help them make informed, healthier choices." The nutrition and health claims are reviewed against a set of criteria which cover: :

- Scientific substantiation of the claimed health relationship or benefit.
- Nutrient profile of the product making the claim.
- Unilever's Food and Beverage Marketing Principles.
- Legal and regulatory frameworks.

Unilever uses "Nutrient Profiles that are based on dietary recommendations to evaluate the overall nutritional composition of all our products. To define a product's suitability for a nutrition or health claim, Unilever scores the product against Unilever's Nutrition Criteria. The result determines if and what type of nutrition or health claims are acceptable on these products. We commit to make nutrition and health claims on fortified products only when they meet relevant Codex standards and the WHO/FAO Guidelines on Food Fortification with Micronutrients."



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The company stands out because of its broad commitment and public disclosure on the appropriate use of claims. The 'Arla Foods' labelling policy' aims to "create a uniform approach to packaging labelling with regards to the use of illustrations and information, including nutrition and health information, on all Arla Foods amba branded products, globally, to ensure simple and accurate product information to enable consumers to make informed dietary choices."

Arla has company specific nutrition criteria and states that they only allow the use of nutrition and health claims on products that meet these. The company commits to use national systems or guidance to get approval for nutrition and health claims and, if none exist, will only use claims in line with the Codex standards.

F1 Nutrition labeling

Have companies improved their commitments to provide nutritional information on the front packaged food and made progress in rolling out their FOP labeling policies?

The average company score on nutrition labeling standards was quite low, at 4.6 out of 10. Danone leads with a score of 9, a significant improvement from 7.3 in 2018. This is mostly due to improvements in its commitments to the use of FOP and BOP labeling on its products, and its new commitment to use interpretive labeling on its products globally. Regarding the display of nutrients, Danone commits to show all nutrients according to Codex Alimentarius Guideline CAC/GL 2-1985, including fiber on product labels. Overall, 16 companies have made a commitment to publicly disclose information both FOP and BOP. Five companies commit to display information only BOP, and four companies have made no commitments regarding labeling.

Table 1 shows that, in 2021, 13 companies disclose their commitments to FOP labeling. Similar to 2018, six companies report having fully rolled out their FOP nutrition commitments in more than 80% of the countries they are active in (or >98% of products globally); although the companies that commit to do so have changed (see Table 1). ATNI estimates this means almost half of the companies have rolled out their FOP labeling commitments to more than 80% of products globally (this was not assessed in 2018).

The new Index shows that 16 companies now also display nutrition information on per serving or per portion size, whereas only nine did so in 2018.

The Global Index 2021 shows three companies (FrieslandCampina, Danone, and Nestlé) that commit to use interpretive labeling (see Box 1) do display nutritional information FOP for all products, and three (Unilever, Kellogg, and Arla) for some of their products globally (see Table 1). In 2018, none of the companies committed to this.

Arla, Nestlé and Unilever are the only three companies that commit not to use additional interpretive labeling or other information FOP that directly relates to the message of the mandatory FOP labeling (which may confuse or distract consumers or modify the effect of the mandatory labeling).

Table 1. Front-of-Pack Labeling

Front-of-Pack								
	Type of nutritional display 2021	Type of nutritional display 2018	Nutritional display does not undermine mandatory Health warning messages (new indicator)	Countries covered by company commitments in 2021 (%)	Products covered by company commitments in 2021 (%)	Countries covered by company commitments in 2018 (%)	Company disclosed commitments on labeling of nutrients 2021	Company disclosed commitments on labeling of nutrients 2018
Ajinomoto			n/a			<5%		
Arla	●		✓	6-49%	>80%	>5%	✓	✓
BRF*						<5%		
Campbell	▲	★		<5%	>79%	>80%	✓	
Coca-Cola	■	◆		>80%	>98%	>80%	✓	
Conagra	▲	◆		<5%	>79%	<5%		
Danone	+	◆		<5%	>79%	6-49%	✓	✓
Ferrero		◆		<5%	>79%	>80%	✓	
FrieslandCampina	+	◆		>80%	>98%	6-49%	✓	
General Mills	■	◆		50-79%	>90%	6-49%		
Grupo Bimbo	▲	◆		>80%	>98%	>80%	✓	
Keurig Dr Pepper	★	Not assessed in 2018		50-79%	>90%			Not assessed in 2018
Kellogg	●	◆		6-49%	>80%	6-49%	✓	
Kraft Heinz	▲	◆		50-79%	>90%	<5%		
Lactalis*						<5%		
Mars	▲	◆		6-49%	>80%	>80%	✓	
Meiji						<5%		
Mengniu*		Not assessed in 2018				Not assessed in 2018		Not assessed in 2018
Mondelēz	▲	★		>80%	>98%	>80%	✓	✓
Nestlé	+	◆	✓	6-49%	>80%	50-79%	✓	
PepsiCo	■	▲		>80%	>98%	6-49%	✓	
Suntory*						<5%		
Tingyi*						<5%		
Unilever	●	◆	✓	>80%	>98%	6-49%	✓	✓
Yili*		Not assessed in 2018				Not assessed in 2018		Not assessed in 2018

- ◆ Interpretive labeling used on all products;
- Interpretive labeling used on some products;
- ★ Numeric information but not % GDA;
- ▲ Numeric % Guideline Daily Amount for multiple nutrients;
- Numeric % Guideline Daily Amount for a single nutrient/energy;
- ◆ Numeric, %GDA (multiple or single not specified)
- ⊕ Commitment to not use additional interpretive labeling that might confuse consumers or modify the effect of mandatory labeling
- ✓ Yes
- * Company did not provide information to ATNI

Have companies improved their commitments to provide nutritional information BOP and made progress in rolling out their BOP labeling policies?

Table 2 shows an overview comparison of companies' BOP commitments in 2021 and 2018. As can be seen, in 2021, 12 companies reported having fully rolled out their BOP nutrition labeling commitments in more than 80% of the countries in which they are active (or >98% of products globally); an increase from 10 in 2018. Of the 25 companies assessed in this Index, 16 publicly disclose their BOP commitments on labeling, compared to 14 in 2018.

In 2021, 14 companies publicly commit to — at a minimum — showing the nutrients recommended by Codex Alimentarius Guideline CAC/GL 2-1985 (i.e., energy value, protein, total carbohydrates, total sugars, total fat, saturated fat, and sodium) for products globally; with six companies extending that commitment to include fiber. No companies report mentioning added sugars on their labels.

Regarding BOP labeling of nutrients, 16 out of 25 companies disclose their commitments. Thirteen companies commit to providing BOP information on the quantity of nutrients as a percentage of the Guideline Daily Amounts (or similar measure) for all key nutrients and energy relevant for a specific market. Three companies do so for only a selection of key nutrients or energy.

Table 2. Back-of-Pack Labeling

Back-of-Pack							
	Nutritional information displayed in line with CODEX, 2021	Nutritional information displayed in line with CODEX, 2018	Countries covered by company commitments in 2021 (%)	Products covered by company commitments in 2021 (%)	Countries covered by company commitments in 2018 (%)	Company disclosed commitments on labeling of nutrients 2021	Company disclosed commitments on labeling of nutrients 2018
Ajinomoto		●			<5%		
Arla	●	Yes + added sugar	>80%	>98%	>80%	✓	
BRF*					<5%	✓	
Campbell	●	Yes + added sugar	>80%	>98%	>80%	✓	✓
Coca-Cola	●	Yes + added sugar	>80%	>98%	>80%	✓	✓
Conagra		Yes + dietary fiber + added sugar	>80%	>98%	<5%	✓	
Danone	Yes + dietary fiber	Yes + dietary fiber + added sugar	>80%	>98%	>80%	✓	✓
Ferrero	●	Yes + added sugar	6-49%	>80%	>80%	✓	✓
FrieslandCampina	Yes + dietary fiber	Yes + dietary fiber + added sugar	50-79%	>90%	6-49%	✓	✓
General Mills	●	Yes + added sugar	6-49%	>80%	6-49%	✓	✓
Grupo Bimbo	Yes + dietary fiber	Yes + dietary fiber + added sugar	>80%	>98%	>80%	✓	✓
Keurig Dr Pepper		Not assessed in 2018	50-79%	>90%	Not assessed in 2018		Not assessed in 2018
Kellogg	●	Yes + added sugar	>80%	>98%	>80%	✓	✓
Kraft Heinz		Yes + dietary fiber + added sugar	No BOP	NO BOP	<5%		✓
Lactalis*					<5%		
Mars	●	Yes + dietary fiber + added sugar	>80%	>98%	>80%		✓
Meiji		●			<5%	✓	
Mengniu*		Not assessed in 2018			Not assessed in 2018		Not assessed in 2018
Mondelēz	Yes + dietary fiber	Yes + dietary fiber + added sugar	>80%	>98%	>80%	✓	✓
Nestlé	Yes + dietary fiber	Yes + dietary fiber + added sugar	>80%	>98%	>80%	✓	✓
PepsiCo	●	Yes + dietary fiber	>80%	>98%	<5%	✓	✓
Suntory*					<5%		
Tingyi*					<5%		
Unilever	Yes + dietary fiber	Yes + dietary fiber + added sugar	>80%	>98%	6-49%	✓	✓
Yili*		Not assessed in 2018			Not assessed in 2018		Not assessed in 2018

● All nutrients according to Codex Alimentarius Guideline (i.e. energy value, protein, total carbohydrates, total sugars, total fat, saturated fat, sodium);
 ✓ Yes
 * Company did not provide information to ATNI

Many of the companies that express commitments to provide nutrition information on their labels are members of the International Food and Beverage Alliance (IFBA) and/or the Consumer Goods Forum (CGF), two global industry associations. By being a member or partner, companies pledge to the global nutrition labeling commitments as determined by the association. Although the industry associations arrange third-party auditing of responsible marketing to children’s commitments, third-party auditing of labeling compliance is not currently in place. Implementing these types of audits could raise credibility and transparency in nutrition labeling across a substantial part of the F&B industry.

How can companies' labeling practices help to reduce food loss and waste?

With constant changes in regulations and labeling laws, consumers from all corners of the world struggle to navigate and interpret the meaning of different types of labels. Regarding the shelf-life of products, some labels include, but are not limited to, “best before date”, “use by date”, “expiration date” or “best if used by”. Shelf-life labeling is determined by local laws and regulations, processing and packaging techniques, and advisory committees, among others. Confusion in interpretation of labels can lead to pre-disposal of large amounts of foodstuff before the actual expiration, referred to as food loss waste (FLW).

In an attempt to reduce FLW, in 2020, the Consumer Goods Forum (CGF), Board of directors adopted a call to action to simplify date labels on products in the US, UK and Japan, with hopes to unify this as a standard in countries across the world.

The Call to Action says retailers and food producers should take three important steps to simplify date labels and reduce food waste by 2020:

- Use only one label at a time.

- Have a choice of two labels: one expiration date for perishable items (e.g., “Use by”) and one food quality indicator for non-perishable items (e.g., “Best if used by”). The exact wording will be adapted to regional context.
- Educate consumers to better understand what date labels mean.

Although the majority of companies have shown they have a target or strategy in place to reduce FLW and provide commentary on this, some CGF members are yet to show examples of their labeling related measures to reduce FLW.

Do companies have labeling strategies in place to reduce food waste?

Food waste is a newly assessed topic in this category, therefore no comparisons to previous iterations can be made. However, companies’ current public strategies and targets aimed at combating food waste are assessed and reported on. Companies can reduce their FLW by improving and standardizing labeling practices.

Of the 19 companies for which information was available, six (Ajinomoto, Campbell, Danone, Meiji, Nestlé, and) have defined a labeling strategy and targets aimed at reducing food waste, and nine have defined either a strategy or targets. Eleven provided a commentary or technical information on their strategy/targets and 11 provided examples of labeling-related measures taken to reduce food waste beyond regulatory requirements (see Table 3).

Table 3. Company Labeling Practices to Reduce Food Waste

Food Loss and Waste			
	Company has FLW strategy or targets in place	Company discloses commentary on FLW practices	Company provides examples of FLW practices
Ajinomoto	★	✔	✔
Arla	■	✔	✔
BRF*			
Campbell	★	✔	✔
Coca-Cola			
Conagra			
Danone	★	✔	✔
Ferrero	■	✔	
FrieslandCampina	■	✔	✔
General Mills	■	✔	✔
Grupo Bimbo			
Keurig Dr Pepper			
Kellogg	■	✔	✔
Kraft Heinz	■		✔
Lactalis*	■		
Mars	■		
Meiji	★	✔	
Mengniu*			
Mondelēz			
Nestlé	★	✔	✔
PepsiCo	■		✔
Suntory*			
Tingyi*			
Unilever	★	✔	✔
Yili*			

★ the company has both a labeling strategy and targets to reduce FLW;
 ■ the company has either a labeling strategy or targets to reduce FLW;
 ✔ Yes
 * Company did not provide information to ATNI

F2 Health and nutrition claims

What are health and nutrition claims?

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.

In addition, health or nutrition claims should only be placed on healthy products as defined by a nutrient profile model (NPM). For that purpose, ATNI considers a Health Star Rating of 3.5 or higher, a NutriScore A or B, as equivalent, or a company specific NPM that has been validated objectively against these systems to determine the healthiness of a product.

A Nutrition claim refers to any representation that states, suggests, or implies that a food has a particular nutritional property. The following do not constitute nutrition claims:

- a) The mention of substances in the list of ingredients.
- b) The mention of nutrients as a mandatory part of nutrition labeling.
- c) Quantitative or qualitative declaration of certain nutrients or ingredients on the label if required by national legislation.

Examples of nutrition claims are statements on products such as 'source of calcium' or 'low in fat'.

A Health claim refers to any representation that states, suggests, or implies that a relationship exists between a food or a constituent of that food with health. It includes nutrient function claims, other function claims and reduction of disease risk claims.

Examples of health claims are statements on products such as 'calcium may reduce the risk of osteoporosis' or 'vitamin D contributes to the normal function of the immune system'.

Have companies improved their commitments to use health and nutrition claims appropriately?

Nestlé and Unilever lead the rankings on the responsible use of health and nutrition claims with a score of 8.3, similar to 2018 (see Novelities and Best Practices above), and are followed by Mondelez, Mars, PepsiCo, and Arla. Nine companies (BRF, Conagra, General Mills, Yili, Keurig Dr Pepper, Lactalis, Mengniu, Suntory and Tingyi) show no sign of committing to international guidelines regarding the use of health and nutrition claims. Campbell receives a score in this 2021 Global Index for committing to comply with Codex guidelines when using health claims.

For countries without a national regulatory system, ATNI refers to Codex guidance. The number of companies that commit to following Codex guidance, in the absence of local regulation, increased from nine to 12 companies for both types of claims. Eight companies publicly disclose their commitments on health and nutrition claims, with publishing its full 'Policy on Nutrition and Health Claims' and demonstrating industry best practice.

Despite progress since the previous iteration of the Index, less than half of the companies express commitments to use health and nutrition claims appropriately, which explains why the average score for this section remains low at 2.5 points.

Have companies improved their commitments to not place health and nutrition claims on unhealthy products?

Companies should only place health or nutrition claims on healthy products as defined by a relevant nutrient profiling model (NPM). ATNI assesses if companies have commitments in place to apply a NPM to assess product healthiness prior to using claims. This is in-line with international standards, to protect consumers from making choices based on misleading information. ATNI considers products as healthy if they achieve a Health Star Rating of 3.5 or higher, a Nutri-Score A or B, as equivalent, or company's own NPM that has been validated objectively against these systems.

In this regard, industry best practice is for companies to commit to not **nutrition claims** on products without first determining the healthiness of the product by using a government endorsed NPM. None of the Index companies make this commitment in full. However, three companies have committed to using their own company specific NPM to assess their products' healthiness, globally, and two companies commit to only use nutrition claims on products that meet their own nutrition criteria. Twenty companies have no commitments in place regarding the use of nutrition claims.

In relation to the use of **health claims** and defining healthy products with nutrient profiling models, no companies in 2021 have committed not to using them on products unless they were defined as healthy by a government endorsed NPM — similar to nutrition claims. Four companies (Ajinomoto, , Nestlé and Unilever) state they will only use health claims when the product meets the nutrition criteria of its own formal internal NPM, and two companies claim to use them only when it meets the nutrition criteria of its own precursor to an NPM. Nineteen companies have made no commitment to refer to an NPM when using health claims.

To what extent do companies place claims on fortified products only when they comply with Codex standards?

ATNI believes companies should use nutrition or health claims on products that have been fortified with micronutrients only when they meet relevant Codex standards and the WHO/FAO Guidelines on Food Fortification with Micronutrients. In 2021, nine companies made public commitments to this effect; however, only seven publicly disclosed this commitment. Of the seven, Mondelez and Unilever are the only two that specify the commitment covers all their operations globally. This represents a slight improvement from 2018, when seven companies made the commitment.

Seven companies, three more than in 2018, disclose their commitment to using health and nutrition claims on products that have been fortified only when these products are compliant with Codex fortification guidelines, or the principles therein. These are Danone, Lactalis, Mars, Mondelez, Nestlé, PepsiCo, and . Lactalis' and PepsiCo's commitments are new, and Danone has progressed since 2018 by disclosing its commitment. Arla, Coca-Cola and FrieslandCampina have made a commitment, but they do not publicly disclose it.



Category G: Engagement

Influencing governments and policymakers and stakeholder engagement

The Global Index 2021 assesses companies' nutrition-related commitments, practices, and disclosure. It is organized into three sections: nutrition governance and management; formulating and delivering appropriate, affordable, and accessible products; and influencing consumer choice and behavior. The three sections are further divided into seven thematic categories. This chapter presents the results of Category G – Influencing governments and policymakers, and Stakeholder engagement; carrying 5% of the weight of the overall score of the Global Index methodology.

Category G consists of two criteria

G1 Lobbying and influencing governments and policymakers

G2 Stakeholder engagement

To perform well in this category, a company should:

- Develop a policy through which they commit to lobbying only in support of measures aligned with the prevention and addressing of malnutrition, and which are supporting public health interests, with emphasis on independent, peer-reviewed science.
- Establish effective management systems for governing lobbying activities, such as Board oversight, audits, and internal whistleblowing systems.
- Disclose lobbying activities relating to nutrition issues, as well as membership and financial support of industry associations and other lobbying organizations, Board seats on such bodies, and any governance conflicts of interest.
- To play an active and constructive part in supporting governments' efforts to combat all forms of malnutrition.
- Conduct comprehensive, well-structured stakeholder engagement focused on improving nutrition-related business strategy and performance, and provide evidence and examples showing how stakeholder engagement has led to improvements of policies and practices.

Ranking on Engagement

G1 Influencing policymakers **G2** Stakeholder engagement

* Did not provide information to ATNI

Nestlé leads this category with a strong, well-structured approach to stakeholder engagement to gather feedback on its nutrition-related strategies and programs. FrieslandCampina and Unilever follow closely behind with strong commitments to, and examples of, supporting governments' efforts to address malnutrition, while also showing evidence of engaging with a wide range of stakeholders in developing their nutrition strategies, policies, and programs.

Category Context

Category G focuses on companies' engagement with government bodies and representatives, and with civil society and academia on nutrition-related issues. Companies are assessed on their efforts to support governments in their efforts to address nutrition priorities, and how they influence legislation and regulation through lobbying. Companies have the potential to make a positive impact by actively supporting the adoption or revision of regulations to improve public health, for example, on topics such as product labeling, use of claims, nutrition standards, responsible marketing, and fiscal measures.

However, as in other sectors, food and beverage companies face increasing scrutiny due to various forms of lobbying that promote policies inconsistent with public health interests, as well as their lack of transparency in doing so.

In addition, companies are assessed on their engagement with expert stakeholders (including international and national organizations, civil society, and academics). Engagement of this nature can help companies strengthen their strategies and policies, and provide valuable feedback on their relevance and effectiveness for improved public health outcomes.

Engagement during the COVID-19 pandemic

ATNI's second COVID-19 report found that many global food and beverage manufacturers have been outspoken in their support for governments in tackling COVID-19. Some have established formal partnerships with governments to address the crisis, while others have responded with donations of Personal Protective Equipment (PPE) and medical equipment, as well as food and monetary contributions.

ATNI's report also found examples of lobbying by food and beverage companies and industry associations that are at odds with public health priorities. For example, positioning unhealthy food categories as "essential products" and continuing to lobby against the development of food regulations and policies consistent with public health. These findings emphasize the need for companies to commit to lobby only in support of measures to improve nutrition and health, and to be transparent about their lobbying activities – both during the crisis and beyond.

While ATNI found some examples of partnerships with government agencies and NGOs to address the pandemic, it also found many examples of companies pursuing their own interventions without clear evidence of consulting experts or key stakeholders. As a result, many have been criticized for donating unhealthy products, for example. This reinforces the need for companies to engage with stakeholders with nutrition expertise in the development of nutrition strategies and programs to ensure that they are designed and executed in a way that ensures and maximizes positive impact on public health.

Relevant changes in methodology

The methodology for the criterion on lobbying and government engagement (G1) has integrated several elements of the [Responsible Lobbying Framework](#), launched in June 2020 (see Box 1). These include whether companies commit to ensuring their lobbying activities support an evidence-based approach to policy making, with emphasis on independent, peer-reviewed science, and if their Codes of Conduct comprise measures to prevent bribery and corruption in its relations with public officials – for example, the offering and receiving of gifts, hospitality, or other financial and in-kind incentives. The latter also includes an assessment of the companies' management systems to control lobbying, such as whether companies: 1) have assigned to their Board oversight of lobbying policy positions, processes and practices, including lobbying by third parties; 2) carry out internal or independent audits of the company's lobbying activities; and 3) have an internal whistleblowing mechanism to allow staff to raise concerns that the company's lobbying policy and/or Code of Conduct has been breached.

The criterion assessing engagement with stakeholders regarding addressing nutrition (G2), meanwhile, has undergone significant changes, with twice the number of indicators as in 2018. There is now more in-depth assessment of the types of stakeholders companies engage with to inform their nutrition strategy and policies; the extent to which companies seek specialist external experts' advice on how to prevent and address obesity and diet-related NCDs, undernutrition, and micronutrient deficiencies (previously assessed in Category A); and companies' adherence to various international Codes of Conduct and initiatives that address food loss and waste (FLW).

More details about the changes in the methodology can be found in the [methodology section](#) of this Index.

Box 1. The Responsible Lobbying Framework

In 2019, ATNI was involved in developing the [Responsible Lobbying Framework \(RLF\)](#), a free, sector-agnostic tool for voluntary self-regulation that sets out globally applicable principles and standards of responsible lobbying. It establishes the principles and practical steps that organizations should take to ensure their lobbying is transparent, accountable, consistent and consistent with public interest. It was launched in June 2020.

Several elements of the Framework have been integrated into the methodology for the criterion on lobbying and government engagement (G1) which now includes indicators regarding lobbying legitimacy and management systems, while reinforcing the indicators regarding transparency.

Key Messages

- The average score in Category G has decreased by 0.6 since 2018 to 2.9. However, this overall figure masks slight improvements in lobbying and government engagement practices (G1) that were outweighed by lower scores in engagement with stakeholders regarding addressing nutrition (G2), which can largely be attributed to changes to the methodology since 2018.
- While just two companies have publicly committed to lobbying only in support of measures to improve health and nutrition, and no companies were found to explicitly commit to only do so on the basis of peer-reviewed science, it is encouraging that nearly all companies have anti-corruption measures and whistleblowing mechanisms in place. Meanwhile, 15 companies have additional lobbying management procedures in place, such as Board oversight of lobbying positions and internal audits of lobbying activities.
- Disclosure on lobbying activities remained broadly consistent with 2018 in terms of extent and number of companies doing so, although many more companies have begun disclosing lobbying positions on specific and relevant nutrition topics – notably front-of-pack labelling and health claims regulation. Nevertheless, there remains a lot of room for improvement, particularly with regard to disclosure of trade association membership, paid lobbyist activity, and governance conflicts of interest.
- Compared to 2018, more companies have made commitments to and/or provide examples of supporting governments in their efforts to prevent and address malnutrition. However, the majority primarily focus on their home markets or a handful of specific contexts; only Nestlé, and to some extent Danone, Unilever, and PepsiCo, demonstrate global commitment and delivery. Moreover, whereas in 2018, seven companies were found to publicly disclose a commentary on their lobbying measures to prevent and address all forms of malnutrition, only three companies were found to do so in this Index.
- While it is positive to see two more companies engaging with stakeholders to improve or develop their nutrition strategies, policies, or programs, fewer appear to do so in a comprehensive, structured manner with both domestic and international stakeholders, or to have formal panels of experts. Public disclosure about these activities was also limited.

General Recommendations

- Companies are encouraged publicly commit to lobby more responsibly; that is, to prioritize and only lobby in support of measures designed to improve health and nutrition and address malnutrition, and to ensure their lobbying is grounded in independent, peer-reviewed science. For guidance on this approach, companies can consult the [Responsible Lobbying Framework](#).
- To reinforce this, companies are recommended to significantly increase the disclosure of their lobbying activities, including expenditure, third parties they support (such as trade associations and lobbying firms), and the issues they support. In doing so, they should go beyond legal compliance and publish this information more comprehensively on their own domains. They could also expand the geographic scope of their lobbying reporting beyond their home markets.
- When developing or updating their nutrition-related strategies, policies, or programs, companies should ensure they conduct a comprehensive and well-structured stakeholder engagement and expert consultation process. Through two-way communication, gathering feedback, and learning, companies can ensure their strategies, policies or programs effectively contribute to addressing public health issues in their respective markets.

Noteworthy changes and best practices



PepsiCo was one of only 2 companies (alongside Danone) found to publicly express a commitment to only engage with governments and policymakers with the intention of supporting measures to prevent and address malnutrition; with PepsiCo being the most transparent regarding disclosure of its lobbying positions on important topics.



General Mills has significantly improved its disclosure on lobbying related to nutrition, publishing a web page describing numerous examples of its engagement with the US government (at both Federal and State levels) in relation to school feeding programs and addressing food insecure communities; supporting strong Dietary Guidelines for Americans and redefining the official 'Healthy' definition; and labelling and marketing. Many of these descriptions include links to formal position statements and public consultation submissions on these matters.



Nestlé works with the Sri Lankan Government to raise awareness of iron deficiency and how to address it, reaching an estimated 13 million people. The company has partnered with Ecuador's Ministry of Education to produce and broadcast an educational TV series, "The Invincible Team", to promote healthier habits, while also collaborating with regional governments in Mexico to promote a program aiming to improve the adoption of healthy lifestyles through educational activities for women. They also have a range of examples in India that were featured within the [2020 India Spotlight Index](#).

The [Feeding Infants and Toddlers Study \(FITS\)](#) in the US has explored the eating patterns and nutritional intake of children during their first four years of life. This initiative was expanded in 2014 to include older children (the Kids Nutrition and Health Study, KNHS) and additional countries; and now comprises China, Mexico, Russia, Australia, the US and the Philippines. The studies provide a comprehensive picture of children's dietary intakes, including nutrients, timing and types of foods consumed at each meal, and feeding practices. In 2019, Nestlé started research projects in Brazil, the United Arab Emirates and Nigeria. Since 2014, FITS and KNHS have resulted in more than 60 papers in collaboration with research partners around the world.





In their latest 'Wellbeing Milestones' report, Kellogg describes in detail its engagement with numerous governments in the US, Latin America, and Europe to address hunger and malnutrition among children from low-income households. Kellogg also states that it actively engages in ongoing conversations with multilateral organizations, governments, and NGOs to identify risks and opportunities, inform new programs and food innovations, and further inform its Wellbeing Strategy, commercial strategy, and corporate policies on undernutrition.



G1 Lobbying and influencing governments and policymakers

Scores improved significantly overall, with all but two companies increasing their score – most by a considerable margin – and the average score almost doubling. This can partly be explained by changes in the methodology, with companies now being credited for practices such as including anti-bribery policies in their Codes of Conduct and whistleblowing mechanisms that are common to nearly all of the companies assessed. Many companies were also credited for having other management systems related to lobbying, which had not previously been researched by ATNI. There was also evidence of significant improvement in some respects since 2018, such as 10 more companies disclosing their lobbying positions on certain important nutrition-related topics, including front-of-pack labelling and health claims regulation, and more companies committing to support governments' efforts to combat all forms of malnutrition. The scores for Arla, Danone, Nestlé, Kellogg and Unilever increased most significantly, with Nestlé leading this criterion.

To what extent do companies commit to lobbying responsibly?

Danone and PepsiCo were the only companies found to publicly express a commitment to only engage with governments and policymakers with the intention of supporting measures to prevent and address malnutrition. For example, in its 2020 Advocacy Policy, Danone states that, in addition to lobbying in support of its mission of “bringing health through food to as many people as possible”, it will do so “with the interests of the consumer in mind and the will to meet public health goals (of which tackling obesity, mal- or under-nutrition).”

No other companies expressed new commitments to this effect, while several companies that had made a similar commitment previously no longer appeared to do so publicly at the time of research. Seven companies, meanwhile, made commitments to the effect of ensuring that their lobbying is evidence-based or scientifically-grounded. However, none explicitly stated that this scientific evidence must be ‘independent’ and ‘peer-reviewed’, as specified in the [Responsible Lobbying Framework](#).

On the other hand, almost all companies were found to have Codes of Conduct that feature measures to prevent bribery and corruption in their relations with public officials, including the offering and receiving of gifts, hospitality, or other financial and in-kind incentives. Sixteen of these extended this commitment to third parties (paid or unpaid by the company).

Do companies have lobbying management systems in place?

To ensure alignment between the companies' lobbying activities and their core commitments, policies, and Codes of Conduct, it is essential that they have effective management systems to manage and control these, including lobbying undertaken by third parties. At a basic level, it was positive to see that almost all companies assessed had an internal whistleblowing mechanism. In addition, 11 companies have assigned to their Board oversight of their lobbying positions, processes and practices, and eight companies carry out internal or independent audits of their lobbying activities. Four companies, Danone, Nestlé, General Mills, and Kraft Heinz, were found to have all three measures in place.

How transparent are companies in their lobbying on nutrition and health topics?

Regarding lobbying contributions and engagement, disclosure remained more or less the same as in 2018 in terms of the number of companies that publish lists of trade association memberships, dues paid to those organizations, governance conflicts of interest, and Board seats on these associations – with 17 companies disclosing at least some information (see Table 1). Although no company's disclosure was fully comprehensive, that of Mars continues to be the most extensive since 2018, as it provides a list of 'key' trade association memberships and Board seats held at these associations, while stating no governance conflicts of interest exist and that it does not make political donations.

Danone, Coca-Cola, Conagra and Mondelez also disclose more than other companies. There remains significant room for improvement, however, with very few companies disclosing complete lists of their trade association memberships, the precise amounts spent on lobbying, Board seats at these organizations, and conflicts of interest.

When using lobbyists and lobbying firms, companies predominantly rely on public transparency registers to make these kinds of disclosures. While US law requires the publication of quarterly reports on companies' lobbying activities and contributions in the USA under the Lobbying Disclosure Act (LDA), which are published on the [Senate's website](#), only nine companies active in the US market provided links to this database on their own website or in a relevant report. Coca-Cola demonstrates best practice in this regard, publishing its quarterly reports directly on its website. Despite most companies assessed being active in European markets, only five companies (Danone, Unilever, Nestlé, Mondelez, Mars, and Ferrero) publicly state that they voluntarily disclose their lobbying activities at EU-level via the EU Transparency Register. With regards to lobbying in other markets, no evidence of disclosure could be found on the companies' public domains. This shows that companies have a long way to go to improve the transparency of their lobbying activities, as Table 1 shows.

Table 1. Overview of companies' disclosure related to lobbying and influencing governments

	Trade Association Memberships	Trade Association Dues used for lobbying (precise amount)	Political Donations	Publishes links to Transparency Registers on website	Board Seats at Trade Associations and on Advisory Bodies	Any potential governance conflicts of interest (or state that none exist)
Ajinomoto						
Arla			✖			
BRF*	▲			n/a		
Campbell	dues >10k USD only	★	US only			
Coca-Cola	lobbying dues >25k USD only	lobbying dues >25k USD only	US only	US LDA		
Conagra	★	★	✖	US LDA		
Danone	▲			US LDA, EU Transparency Register		★
Ferrero	▲			EU Transparency Register		
FrieslandCampina	★		✖		★	★
General Mills	lobbying dues >25k USD only			US LDA		■
Grupo Bimbo	▲		✖			
Keurig Dr Pepper	★	dues >25k USD only				
Kellogg	dues >50k USD only	dues >50k USD only	✖			■
Kraft Heinz	dues >50k USD only	dues >50k USD only		US LDA		
Lactalis*						
Mars	▲		✖	US LDA, EU Transparency Register	★	★
Meiji	★				★	
Mengniu*				n/a		
Mondelez	dues >50k USD only	dues >50k USD only	US only	US LDA, EU Transparency Register		
Nestlé	▲			US LDA, EU Transparency Register	★	■
PepsiCo	dues >25k USD only		US only			■
Suntory*						
Tingyi*				n/a		
Unilever	▲		✖	US LDA, EU Transparency Register		■
Yili*				n/a		

★ Discloses comprehensively;
 ▲ Discloses partially / Limited in some way;
 ✖ Commits not to make political donations;
 ■ Has measures in place to manage, but does not publicly disclose
 * Company did not provide information to ATNI

Whereas only two did so in 2018, 12 companies disclosed at least one lobbying position on important nutrition topics, with Front-Of-Pack labelling being the most common. PepsiCo continues to be the most transparent in this regard, being one of two companies (alongside General Mills) to explicitly state that they lobby for responsible marketing legislation. It is also one of two companies, alongside Coca-Cola, to disclose their position on fiscal measures. While both companies state that they oppose taxation on sugary beverages to address obesity, they are transparent about doing so.

General Mills, meanwhile, has significantly improved its disclosure, publishing a web page with numerous specific examples of its engagement with the US government (at both Federal and State levels) in relation to school feeding programs and food insecure communities; supporting strong Dietary Guidelines for Americans and redefining the official 'Healthy' definition; and labelling and marketing – including links to formal position statements and public consultation submissions on these matters. However, it makes no disclosure in relation to its lobbying in other markets.

Only three companies (FrieslandCampina, Kellogg, and General Mills) publicly disclose a commentary on their lobbying measures to prevent and address all forms of malnutrition. Kellogg, for example, describes in detail in its latest 'Wellbeing Milestones' report its engagement with numerous governments in the US, Latin America, and Europe to address hunger and malnutrition among children from low-income households.

Do companies support governments efforts to combat all forms of malnutrition?

Separate from lobbying, 10 companies now make some form of commitment to playing an active and constructive part in supporting governments' efforts to combat all forms of malnutrition – with Unilever, Meiji, and Tingyi joining the six companies that already did so in 2018. These efforts include engaging in partnerships with public authorities, participating in their nutrition campaigns and programs, or responding to government calls to action. Meiji, for example, participates in the Nutrition Japan Public Private Platform (NJPPP), supporting the Japanese government's global agenda to improve nutrition in association with the Tokyo Olympic and Paralympic Games, while Tingyi commits to actively participate in the Chinese government's National Nutrition Plan (NNP).

Danone, Nestlé, FrieslandCampina, and PepsiCo, meanwhile, are the only companies that publish more comprehensive, globally-applicable commitments to support governments efforts to combat malnutrition. Nestlé, for example, in its 'Policy on Transparent Interactions with Public Authorities', states "shall, to the best of its abilities, support the actions of public authorities that aim to enhance quality of life and contribute to a healthier future for individuals and families, for communities and for the planet. This includes, but is not limited to, support to government efforts to address malnutrition and diet related chronic diseases."

Thirteen companies provided concrete examples of actively working with governments to address malnutrition in the countries they are active in. However, only three (FrieslandCampina, Nestlé and Unilever) could do so for three or more countries. For example, Nestlé works with the Sri Lankan Government to raise awareness of iron deficiency and how to address it, reaching an estimated 13 million people. They have partnered with Ecuador's Ministry of Education to produce and broadcast an educational TV series, "The Invincible Team", to promote healthier habits, while also collaborating with regional governments in Mexico to promote a program aiming to improve the adoption of healthy lifestyles through educational activities for women. They also have a range of examples in India that were featured within the [2020 India Spotlight Index](#).

Recommendations G1

- Companies are encouraged to publicly commit to lobby responsibly; that is, with an explicit focus on supporting measures designed to improve health and nutrition with a solid grounding in independent, peer-reviewed science. They are advised develop adequate internal controls to ensure their lobbying activities align with company policy. More information can be found in the [Responsible Lobbying Framework](#).

- To be as comprehensive and accurate as possible, all companies can expand their public disclosure of lobbying-related matters. This shows external stakeholders how the company is seeking to shape government policy, and demonstrates their commitment to lobby responsibly and fosters trust in doing so. Companies therefore are recommended to ensure they publish complete lists of the trade associations they engage with, as well as the specific dues they pay and how much of this is earmarked for lobbying purposes. They could consider following Coca Cola's example and make it as easy as possible for stakeholders by publishing their lobbying disclosure reports directly on their websites. Moreover, while some companies provide links for US and EU-based lobbying reports, they are encouraged to do so for each market they actively lobby in (or state otherwise).
- Following Nestlé, FrieslandCampina, and Danone's example, companies could take a more active and constructive role in supporting governments' efforts to combat all forms of malnutrition, ensuring they do so not only in their home countries, but in other markets the company is active in.

G2 Stakeholder engagement

Do companies engage with stakeholders to inform nutrition practices?

Seventeen companies provided evidence of some form of engagement with stakeholders designed to improve or develop their nutrition strategy, policies, or programs – a slight improvement from 2018. Eight companies report that they engage with civil society organizations, while seven companies state that they engage with academic institutions and scientific bodies, seven companies report engaging with international organizations (such as UN bodies), and three companies mention engaging with national-level public authorities. Meanwhile, nine have partnerships with, or formally support, prominent international initiatives/organizations that address malnutrition in priority populations. For example, seven companies are members of the SUN Business Network, six work with GAIN, and four work with the World Food Program.

That said, only eight companies (one fewer than in 2018) engage in a comprehensive, well-structured and focused manner – others could only provide more limited or relatively ad hoc examples. Of these eight, Nestlé, Danone, Ajinomoto, and Kellogg engaged with stakeholders internationally, while Mars, PepsiCo, FrieslandCampina and Mondelez provided examples from single markets only. A promising example is Kellogg, which states that it actively engages in ongoing conversations with multilateral organizations, governments, and NGOs. It does in order to: identify risks and opportunities in relation to nutrition; inform new programs and food innovations; and guide its Wellbeing Strategy, commercial strategy, and corporate policies relating to undernutrition. Danone now partners with FAO and local expert groups to analyze local health and nutrition contexts and develop strategies to address malnutrition in many of the markets its active in.

Table 2. Overview of companies' engagement with key stakeholder groups to develop their corporate nutrition policy or programs

	Quality of engagement with stakeholders to improve companies' nutrition policy/program	International organizations (e.g. UN agencies)	National bodies and public bodies	CSOs, including NGOs	Academic institutions or scientific experts	Other	Geographic scope of engagement
Ajinomoto	★				✓		Globally
Arla	▲			✓			Home market
BRF*	▲				✓		Home market
Campbell	▲						
Coca-Cola	▲			✓			Major markets
Conagra							
Danone	★	✓		✓	✓		Globally
Ferrero							Globally
FrieslandCampina	★	✓	✓	✓			
General Mills	▲			✓	✓		Globally
Grupo Bimbo	▲						
Keurig Dr Pepper							
Kellogg	★	✓	✓		✓		Globally
Kraft Heinz							
Lactalis*							
Mars	★			✓			Home market
Meiji	▲					✓	Home market
Mengniu*							
Mondelēz	★	✓			✓		Globally
Nestlé	★	✓		✓			Globally
PepsiCo	★			✓		✓	Major markets
Suntory*	▲						
Tingyi*	▲				✓		Home market
Unilever	▲	✓	✓				Major markets
Yili*							

★ Comprehensive/well-structured;
 ▲ Limited/ad hoc;
 ✓ Evidence of engagement
 * Company did not provide information to ATNI

However, disclosure on companies' stakeholder engagement was quite limited. While 13 companies publish a broad statement about the benefits of nutrition-related stakeholder dialogue, only two – Nestlé and Unilever – publish a detailed narrative about their stakeholder engagement. Meanwhile, no company was found to publicly disclose specific examples of how input has been used to adapt nutrition-related policies/programs.

Do companies consult with specialist external experts on designing strategies, policies and programs to address obesity, diet-related chronic disease, undernutrition and micronutrient deficiencies?

Twelve companies were found to consult specialists on addressing obesity and diet-related chronic diseases on a strategic/Board level in some way. However, only five of these (Arla, Mars, Danone, Campbell's, and General Mills) have a formal panel of experts – the other companies were found to consult on a less systematic, more ad-hoc basis. Campbell, for example, produced its first corporate position paper on sodium with consultation from a panel of scientific advisors.

Do companies adhere to voluntary international standards and codes of conduct relating to food supply chains?

Promisingly, all but four companies subscribe to at least one relevant voluntary international standard or code of conduct relating to food supply chains, most commonly the UN Guiding Principles on Business and Human Rights (19 companies), UN Global Compact (18 companies), and the OECD Guidelines for Multinational Enterprises (13 companies). In addition, Friesland Campina, Nestlé, Coca Cola, and Kraft Heinz all adhere to the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration); while Nestlé, Mars, Arla, and Danone are members of the 2016 FAO/OECD Guidance for Responsible Agricultural Supply Chains.

Recommendations G2

- When developing or updating their nutrition-related strategies, policies or programs, companies are recommended to conduct comprehensive and well-structured stakeholder engagement and expert consultation processes. Through two-way communication, gathering feedback, and learning, companies ensure that their strategies, policies, or programs effectively contribute to addressing public health issues in their respective markets.
- Companies are therefore advised to ensure they engage with a wide range of stakeholder types, including organizations and individuals with reputed expertise on nutrition-related topics, at both a national and international level.
- Meanwhile, companies that have not yet done so are encouraged to establish a formal panel of experts encompassing a wide-range of expertise and backgrounds to advise on their nutrition strategies, policies, and programs; especially in relation to addressing obesity and diet-related NCDs, undernutrition, and micronutrient deficiencies.
- In order to demonstrate to other stakeholders the engagement process that informed their new nutrition-related strategies, policies, or programs, companies are recommended to ensure they publicly disclose information about these processes, including who was engaged and how their feedback was taken on board.

BMS/CF

Chapter

Global Index

2021

The BMS/CF Marketing Index assesses the extent to which the world's nine largest manufacturers of breast-milk substitutes (BMS) and complementary foods (CF) market their products in line with WHO guidance.

About the BMS/CF Marketing Index and its link to the Global Index

The BMS/CF Marketing Index assesses the extent to which the world's nine largest manufacturers of breast-milk substitutes (BMS) and complementary foods (CF) market their products in line with WHO guidance, as set out in the 1981 International Code of Marketing of Breast-milk Substitutes (BMS) and 18 subsequent relevant World Health Assembly (WHA) resolutions (collectively referred to as The Code). For the studies ATNI commissioned to assess the companies' marketing in the Philippines and Mexico, the scope extends to any national legal measures that go beyond The Code.

This Index is the only one of its kind. A score of 100% would indicate that a company's marketing policies, practices and disclosure are fully aligned with international recommendations.

Similar prior assessments were presented as a sub-ranking of ATNI's 2016 and 2018 Global Indexes. Now, to place greater emphasis on, and direct greater attention to the critical importance of the health and nutrition of infants and young children, ATNI published a stand-alone Index.

The results of the BMS/CF Marketing Index will again feed into the Global Index 2021, as in previous iterations and in the same way, for any company in the Global Index that generates more than 5% of its total global revenues from sales of formula and foods for infants and young children. Therefore, the scores of six of the nine companies assessed on the BMS/CF Marketing Index will be used to calculate a proportionate adjustment to these companies' Global Index scores. The six companies are Danone, FrieslandCampina, KraftHeinz, Nestlé, Mengniu and Yili.

The importance of nutrition in early life

The critical importance of good nutrition and healthy diets has been underlined by the COVID-19 pandemic. Baby food companies can play a critical role in improving the health and life prospects of infants and young children by protecting and supporting breastfeeding. By following the recommendations of The Code, they can contribute to the realisation of several WHO 2025 nutrition targets and the Sustainable Development Goals. Specifically, to SDG 2 – by preventing child mortality and various forms of undernutrition – and SDG 3 – by decreasing children's risks of developing NCDs later in life.

Until such time as all countries have passed laws and regulations to give effect to The Code, baby food companies can contribute to health and nutrition by voluntarily marketing their products in line with WHO recommendations.

To date, only 31 countries have a Code-aligned legal framework to control the marketing of BMS and CF. While many factors have contributed in recent years to falling breastfeeding rates in many countries, and the concomitant increasing use of BMS, a principal driver has been the increasing and widespread marketing of these products. Breastfeeding has long been proven to provide myriad significant health benefits compared to BMS. These benefits are unique to breastfeeding and help both mother and infant. Positive long-term benefits for infants include protection against becoming overweight or obese, as well as against certain non-communicable diseases such as diabetes mellitus. Further, in areas of the world where hygiene is poor and the availability of, and access to, food is sub-optimal, breastfeeding is key to lowering infants' risk of undernutrition and infectious diseases.

Methodology

The full methodology is available [here](#). In short, the Index scores and ranks companies based on two types of assessment that are given equal weight. The first – BMS/CF 1 – determines the extent to which the companies' own policies – adopted voluntarily – and their associated management systems and disclosure align fully to the recommendations of The Code. One section also assesses the stance companies take on lobbying governments in relation to adoption of legal measures to implement The Code. The companies' scores are based both on information in the public domain and – if they wish – unpublished internal documentation which they submit under a non-disclosure agreement to ATNI's online research platform. For those companies included in the Global Index 2021, the total possible adjustment made based on the Corporate Profile or BMS/CF 1 score is -0.75, 50% of the maximum possible adjustment of -1.5.

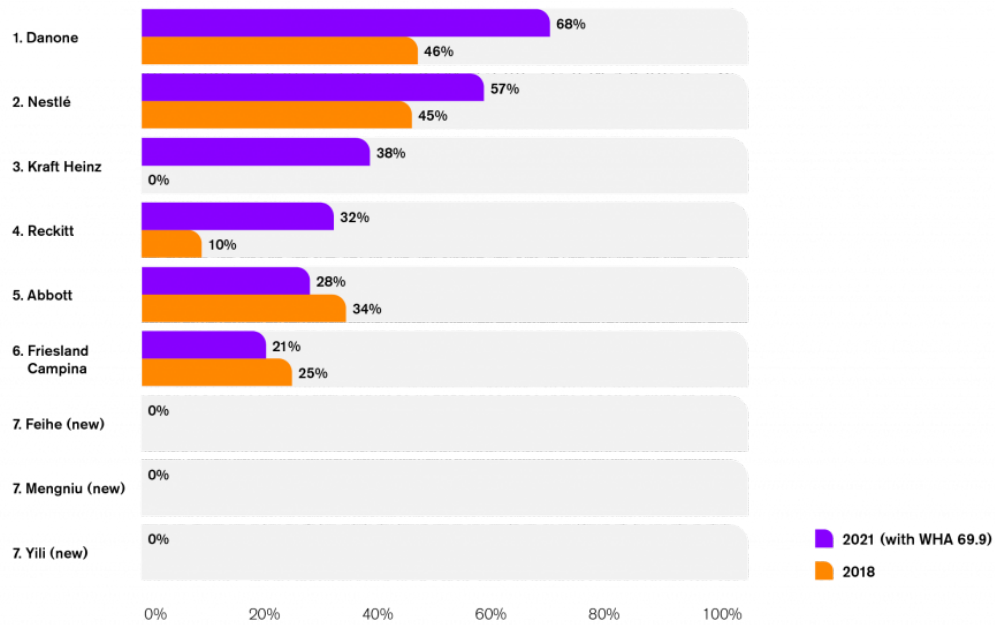
The second – BMS/CF 2 – aims to assess the extent to which companies market their products in line with The Code within two low or middle-income countries (called higher-risk countries). As for previous assessments, ATNI selected two countries in which to undertake research for this Index: the Philippines and Mexico. ATNI's summary reports, and those of Westat, the company which ATNI commissioned to undertake them, are available [here](#). For those companies included in the Global Index 2021, the total possible adjustment made based on the in-country assessment or BMS/CF 2 score is -0.75, 50% of the maximum possible adjustment of -1.5.

Numerous factors relating to the companies' own policies and practices, their market share, length of time in the market and the alignment of national legal measures with The Code, and others, influences how companies perform on the second element of the assessment. For the first time, ATNI provided data from this element of the research to FTSE Russell to use in its decisions about the suitability of Danone, Nestlé and Reckitt to continue to be constituents of its FTSE4Good Index Series.

Given that the final combined BMS/CF score represents the level of compliance with the ATNI methodology, for companies included in the Global Index 2021, the adjustment is based on the level of non-compliance. Therefore, the calculation for the adjustment is: $-1.5 \times (100\% - \text{final combined score})$. The maximum adjustment however for Mengniu and Yili is -0.75 given that they were only assessed on BMS/CF 1 as they have no market presence in the Philippines and Mexico; the calculation for the adjustment is: $-0.75 \times (100\% - \text{final corporate profile score})$.

One principal change to the previous methodology is the inclusion of an assessment, for the first time, of companies' marketing in accordance with 2016 WHO 'Guidance on ending the inappropriate promotion of foods for infants and young children', referenced in WHA Resolution 69.9 adopted at the 69th World Health Assembly. Another notable change is the inclusion of the next three largest companies in the baby food segment, which are all based in China. ATNI was unable to establish contact with these companies and therefore they did not engage in the research process. Their assessments therefore had to be based only on information in the public domain, as has been the case for other companies in the past.

BMS/CF Marketing Index 2021 Ranking



Key finding

Fully 40 years after the original International Code of Marketing of Breast-milk Substitutes was adopted, this Index provides clear evidence that the marketing practices of the world's nine largest manufacturers of formula and foods for infants and young children are far from being aligned with its recommendations. Similarly, despite the WHA having passed 18 related resolutions since 1981, including and having endorsed in 2016 new guidance on ending the inappropriate promotion of foods for infants and young children, none of the companies assessed yet abides by the recommendations made in, or associated with, all of these resolutions.

All BMS companies were addressed by a [BMS Call to Action](#) issued in June 2020 by WHO, UNICEF and several non-governmental organizations which urged them to publicly acknowledge The Code and to commit to delivering full Code compliance by 2030 at the latest. While 17 companies responded – including seven included in this Index, most did not make the requested commitments or action. The signatories to the Call to Action, in their [response to industry](#), stated that they were *'profoundly disappointed that no other company, including the largest global companies, took this crucial opportunity to commit to achieving compliance with internationally agreed health policy.'*

The UN Food Systems Summit, being held in September this year, and the Nutrition4Growth Summit being hosted by the Government of Japan in December, provide all baby food companies with the ideal opportunity to make the commitments necessary to honor The Code. We call on their investors and other stakeholders to encourage them to take this vital step. Those governments that have not yet adopted legal measures to fully implement The Code could also take this opportunity to do so. With less than a decade to go to realize the SDGs, now is the time for the companies ATNI has assessed – and all others in the sector, to commit to delivering on their responsibilities.

Results by company

The table below shows the component scores on each element – BMS/CF 1 and BMS/CF 2 – and the impact on relevant companies' Global Index 2021 scores.

1. **Danone** retained first place, with a score of 68%, up substantially from its score of 46% in 2018 – the Global Index adjustment is therefore -0.48. It had the second highest sales in this segment in 2019 of US\$ 8.5 billion. Its higher score in 2021 was driven principally by higher levels of compliance with The Code and local regulations that go beyond The Code in the Philippines and Mexico compared to the levels of compliance found in previous studies carried out in Nigeria and Thailand for the 2018 Index. It therefore achieved a higher score on BMS/CF 2 than in 2018. Though it has not revised its policy since the last assessment, the company's overall score fell in relation to its policy, management systems and disclosure, i.e., on BMS/CF 1. While it provided evidence of slightly stronger management systems in some areas and scored slightly better on the lobbying section of the methodology, the deterioration in its BMS/CF 1 score overall was due to the company having not adopted any of the recommendations in the guidance associated with WHA 69.9 and as a result there being no related disclosure.

3. **KraftHeinz** increased its ranking to third, with a score of 38%, up from a score of zero in 2018 – the Global Index adjustment is therefore -0.93. This company is substantially different to the other nine assessed, as it is both the smallest, with global sales in 2019 of US\$ 512 million. It generated most of those sales from complementary foods, whereas all of the other companies generated most of their sales from BMS. The improvement in its score was driven by two factors. The company provided to ATNI for the first time its BMS Marketing Charter for assessment, and participated in the research process, which increased its BMS/CF 1 score. It also achieved a better result in the 2020 Mexico study compared to the one carried out in Nigeria in 2017. As a result, its BMS/CF 2 score also increased.

2. **Nestlé** is the market leader with sales of just over US\$15 billion from this segment in 2019. It retained its second place, with a score of 57%, up substantially from its score of 45% in 2018 – the Global Index adjustment is therefore -0.64. This increase was principally a result of the higher level of compliance with The Code and local regulations that go beyond The Code in the studies carried out in the Philippines and Mexico, compared to the results from the studies carried out in Nigeria and Thailand for the 2018 Index. It therefore achieved a higher score on BMS/CF 2 than in 2018. Nestlé's score fell in relation to its policy, management systems and disclosure as measured by BMS/CF 1, principally because the company has not adopted any new commitments to give effect to the guidance associated with WHA 69.9, nor any related management systems. As a result, it could not score on the relevant disclosure indicators.

4. **Reckitt** (previously called RB until it rebranded in March 2021, which owns the former Mead Johnson Nutrition brands), was the fourth largest company in this segment in 2019 with sales of US\$ 3.8 billion – Reckitt is not included in the Global Index 2021 as it is not classified as a food and beverage company. It increased its ranking to fourth, with a score of 32%, up from a score of 10% in 2018. This improvement is due to the company having developed and published a new BMS marketing policy, and having adopted associated management systems, as well as disclosing more. The company also engaged fully with ATNI's research process for the first time. These factors all contributed to its higher BMS/CF 1 score. Compared to the findings of the in-country studies carried out for the 2018 Index, Reckitt achieved higher levels of compliance with The Code and local regulations that go beyond The Code in one of the two countries, i.e., in Mexico, but not in the Philippines. Its BMS/CF 2 score therefore also improved.

5. **Abbott's** ranking fell to fifth, with a score of 28%, down from 34% in 2018. It is the third largest company in the segment, with sales of just over US\$4 billion in 2019 – Abbott is not included in the Global Index 2021 as it is not classified as a food and beverage company. The company revised its BMS marketing policy since the 2018 assessment. While it now commits to uphold its policy in markets where regulation is absent or less stringent than its policy, which is a positive development, the wording of the new policy is considerably less well aligned with The Code than the previous iteration. As a result, its score fell on BMS/CF 1. The company's levels of compliance found in the in-country studies did not change between 2018 and 2021. It had a high level of compliance with The Code and local regulations that go beyond The Code in the Philippines (as it did in Nigeria in 2018), and a low level of compliance with The Code in Mexico (as it did in Thailand in 2017). Its BMS/CF 2 score therefore did not change.

=7. **Feihe**, a new entrant to the Index, ranks equal seventh, with no score. The company does not appear to publish a BMS marketing policy or any other relevant documents. As it does not market its products in either Mexico or the Philippines, its score does not include any results from the in-country studies. Feihe is not included in the Global Index 2021 as it is not part of the 25 largest food and beverage companies.

=7. **Mengniu**, a new entrant to the Index, ranks equal seventh, with no score – the Global Index adjustment is therefore -0.75. The company does not appear publish a BMS marketing policy or any other relevant documents. As it does not market its products in either Mexico or the Philippines, its score does not include any results from the in-country studies.

6. **Friesland Campina** is the sixth largest company in this segment, with 2019 global sales of close to US\$1.5 billion. Its ranking fell to sixth, with a score of 21%, down from 25% in 2018 – the Global Index adjustment is therefore -1.18. The company has not changed its policy since the previous assessment; the wording is relatively well aligned to The Code. However, although the company commits to uphold its policy in markets with no relevant regulation, in markets where legal measures are in place, it defers to them, both in terms of the products within their scope and the provisions relating to marketing and labelling. The company has improved its management systems a little and improved its disclosure since 2018. Its lower score and ranking in this Index are principally due to a higher penalty being applied to its BMS/CF 1 score than previously, due to its stance in relation to local regulations, which is explained further in the report. The company's level of compliance in the one in-country study in which it was included – Mexico – was low, as it was in Nigeria in 2018, and therefore its BMS/CF 2 score did not change.

=7. **Yili**, a new entrant to the Index, ranks equal seventh, with no score – the Global Index adjustment is therefore -0.75. The company does not appear to publish a BMS marketing policy or any other relevant documents. As it does not market its products in either Mexico or the Philippines, its score does not include any results from the in-country studies.

Company scores and rankings, 2021, and Global Index 2021 adjustment, where relevant

Rank	Company	Global Index adjustment	Max. potential adjustment	Increase or decrease in rank since 2018	Combined total BMS/CF marketing score (out of 100%)	BMS/CF 1: Corporate Profile score	BMS/CF 2: In-country assessment score (out of 100%)	Combined total BMS marketing score, 2018 (out of 100%)	% change, 2018-2021
1	Danone	-0.48	-1.5	=	68%	53%	83%	46%	+22%
2	Nestlé	-0.64	-1.5	=	57%	48%	66%	45%	+12%
3	KraftHeinz	-0.93	-1.5	↑	38%	11%	66%	0%	+38%
4	Reckitt	N/A	-	↑	32%	47%	17%	10%	+22%
5	Abbott	N/A	-	↓	28%	24%	33%	34%	-6%
6	Friesland Campina	-1.18	-1.5	↓	21%	42%	0%	25%	-4%
=7	Feihe	N/A	-0.75	New	0%	0%	N/A	N/A	N/A
=7	Mengniu	-0.75	-0.75	New	0%	0%	N/A	N/A	N/A
=7	Yili	-0.75	-0.75	New	0%	0%	N/A	N/A	N/A

Ten key findings and recommendations

1. Two companies have made significant improvements in their BMS marketing policies, management systems and/or disclosure – as illustrated in their BMS/CF 1 Corporate Profile scores.

- Reckitt revised and published a comprehensive BMS marketing policy following the acquisition of Mead Johnson Nutrition in 2017. The policy however applies only to infant formula and follow-on formula (and excludes most of its formulas for special medical purposes, FSMPs).
- For the first time, KraftHeinz shared its BMS Marketing Charter with ATNI though it has substantial gaps compared to The Code and does not cover CF, which make up most of its sales.

ATNI welcomes these improvements.

3. None of the six companies that have a BMS marketing policy fully incorporate the wording of all articles of The Code, i.e., the 1981 Code and all subsequent relevant WHA resolutions and related guidance and standards, up to and including WHA 69.9.

- This is illustrated in their initial BMS/CF 1 scores falling well short of 100%.

All six companies are urged to update their existing policies to align their wording fully to The Code.

2. Three companies achieved high or complete compliance with The Code, and national regulations that go beyond The Code, in the two studies conducted in Mexico and the Philippines during 2020. This is illustrated by their BMS/CF 2 scores.

- Danone demonstrated complete compliance in the Philippines. It also achieved a high relative level of compliance in Mexico.
- Nestlé was found to have a high relative level of compliance in both Mexico and the Philippines during the study period. It is the market leader by sales value in both countries.
- KraftHeinz also achieved a high level of compliance in Mexico in relation to its CF products.

ATNI commends these results but encourages the companies to take action to eliminate all incidences of non-compliance as soon as possible.

4. The three companies newly added to this Index – Feihe, Mengniu and Yili – have not yet published a BMS marketing policy.

ATNI strongly encourages these companies to publish BMS marketing policies in which they commit both to uphold national regulation in China (and any other countries in which they currently do business or may do business in future) and to implement The Code in full in all markets.

5. No company's BMS marketing policy covers all types of formula marketed as suitable for infants from birth to 36 months of age.

- This is the most significant, common weakness in the companies' policies. While more include infant formulas and follow-on formulas within their scope, none extend to growing-up milks. Further, many companies state that some or all of their FSMP products (formulas for special medical purposes) are excluded from their policies and/or they follow national regulatory definitions of these products. Although not yet factored into ATNI's methodology nor the companies' scores, of particular concern is the exclusion from the scope of company policies some or all of their FSMPs. These products are BMS and have always been included in the definition of BMS products in the scope of The Code and should be included within the scope of companies' BMS marketing policies.

All companies must extend the scope of their policies to include all types of formulas, including growing-up milks and all FSMPs, to fully align them to The Code.

7. The geographic application of companies' policies is not universal and therefore not fully aligned to The Code.

- The Code is intended to be applied consistently in all markets. The Code does not make a distinction between 'higher-risk' and 'lower-risk' countries. This distinction was introduced by FTSE Russell's FTSE4Good Index Series in 2010.

All companies are urged to restate the geographic scope of their policies to be global, in respect of all product types and all provisions of The Code.

6. None of the companies has a policy on marketing CF for young children aged 6-36 months that aligns to the recommendations the guidance associated with WHA Resolution 69.9

- Despite this resolution and the associated guidance being adopted by the WHA five years ago, in May 2016, which inter alia made new and specific recommendations about marketing CF, none of the companies that make these foods have published a separate policy or amended their existing policy provisions to implement the recommendations in full.

All companies must revise their policies to incorporate commitments to implement in full the recommendations in the guidance associated with WHA Resolution 69.9 in relation to CF for children 6-36 months of age.

8. Companies' approaches vary with regards to upholding their own policies in relation to local legal measures that implement The Code.

- While all companies commit to uphold national laws, regulations and standards, and most pledge to uphold their policies in full where such legal measures are absent or less extensive than their own policies, not all companies do so.

ATNI calls on all companies that do not yet do so to commit not only to comply with local laws and regulations, but to go further and uphold their policies in full – adhering to the scope they establish for their policies in terms of products and types of marketing, and to do so in all countries where legal measures are weaker than The Code, or where they are absent altogether.

9. Gaps between the companies' policies and The Code were made clear by the in-country assessments in the Philippines and Mexico.

- The critical importance of both strong national laws and regulations and of companies adopting global policies that align fully to The Code was made clear by the results of the studies in the Philippines and Mexico. While neither country's laws nor regulations fully implement The Code, those of the Philippines are much more closely aligned to it than those in Mexico. As a result, ATNI found far fewer incidences of non-compliance with The Code and the one aspect of local regulations relating to labelling in the Philippines (152) than in Mexico (325).
- Moreover, the compliance of the companies included in this Index was better in relation to product types covered by their policies (typically infant formulas and follow-on formulas) and worse in relation growing-up milks and CF (though these products are also less well covered by the national legal measures). This illustrates that when companies adopt policies aligned to The Code and put in place effective management systems to implement those policies, less inappropriate marketing occurs.

ATNI calls on all countries that have not yet done so to emulate the 31 countries that have to date adopted laws and regulations substantially or fully aligned with The Code. By doing so they will create a level-playing field for ALL companies.

However, given that it is likely to take many years for countries to pass such measures, in the meantime it is imperative that companies adopt marketing policies that fully align to the Code, in all dimensions, as already noted.

10. Some companies' have reasonably good commitments relating to lobbying in relation to legal measures and standards to implement The Code. Now is the time to strengthen them.

- It is vital that all countries adopt national laws, regulations and standards that fully align to The Code. ATNI assessed the extent to which companies pledge to support such efforts by assessing the relevant commitments, management systems and disclosure, using a small number of indicators. However, a related report published in June 2021 entitled [Spotlight on Lobbying](#) – provides a more comprehensive picture.

Companies that make BMS and CF must make clear and unequivocal commitments to support – and not to undermine – the efforts of governments and international bodies to adopt Code-aligned legal frameworks. This will both provide the necessary protections to breastfeeding while also creating a level-playing field on which all companies can compete fairly. Without such measures, most companies are reluctant to make voluntary commitments due to the considerable impact such steps would have on their revenues and profits.

ATNI calls on all companies to implement the [Responsible Lobbying Framework](#) in full and to put in place rigorous systems to ensure that their interactions with policymakers and governments in all markets are governed by their public commitments. Much greater transparency about their lobbying positions and activity must also be provided. Investors are urged to use their influence with companies to encourage them to take these steps.

Future Indexes

ATNI hopes that this Index will aid the work of all organizations and individuals committed to improving the health of infants and young children, particularly through increasing breastfeeding everywhere. ATNI encourages all stakeholders to use the Index and to provide feedback about how they have used it and how it could be improved in future.

From the autumn of 2021, ATNI will hold a series of consultations with a wide range of stakeholders to collate this input and inform the evolution of the methodology for the next Index.

The next BMS/CF Marketing Index – planned for 2023 – will be expanded to the world's 20 largest baby food manufacturers.

Amplifying impact

Companies urgently need to deliver on the Sustainable Development goals:



End hunger, achieve food security and improved nutrition



Ensure healthy lives and promote well-being for all

In doing so, they can contribute to the realization of all the SDGs. ATNI encourages all stakeholders to actively use the 2021 Index results and provide their feedback to ATNI. We hope the rated companies will commit to make changes based on our recommendations, and that their investors will use the recommendations in their engagement with those companies to press for improvements in their policies, practices, and disclosure. Furthermore, we hope that governments and policymakers, NGOs, academics, and others can use our analysis and findings in their work to encourage better diets worldwide.

The Global Access to Nutrition Index (ATNI) 2021 would not have been possible without the generous support of the Bill & Melinda Gates Foundation, Foreign Commonwealth and Development Office, and the Dutch Ministry of Foreign Affairs (DGIS).

The Global Index 2021 was produced by the ATNI team, consisting of: Aline Kwizera, Aurélie Reynier, Babs Ates, Bo-Jane Woods, David Jerome, Efi Chatzinikolaou, Elena Schmider, Estefania Marti Malvido, Fiona Kirk, Inge Kauer, Julia Lladós i Vila, Marije Boomsma, Mark Wijne, Martina Asquini, Nadine Nasser, Osien Kuumar, Paul Vos, Sameea Sheikh, Will Sharp, and Yade Cosgun; and ATNI consultants: Amanda Berhaupt-Glickstein, Katy Cooper, Minqi Wang, and Rachel Crossley. The ATNI team drew on the expertise and advice of the ATNI Expert Group, whose close engagement throughout the ATNI development process has been a source of invaluable guidance, and this report benefited greatly from their input. The views expressed in this report, however, do not necessarily reflect the views of the group's members or of their institutions.



Ministry of Foreign Affairs

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Foreign, Commonwealth
& Development Office

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Research/ Implementing Partners

The George Institute

Elizabeth Dunford and Fraser Taylor of The George Institute for Global Health (The George Institute), conducted the Product Profile assessment for the 16 companies in this 2020 Index and the analysis of changes in the nutritional profile of packaged food and beverage products from 11 large companies in India over a three year period for the Access to Nutrition Initiative.



The George Institute
for Global Health

Innova Market Insights

Innova Market Insights (Innova), a commercial knowledge supplier for the Food and Beverage industry, provided product composition data.



INNOVA
MARKET
INSIGHTS

73BIT

Development 73BIT, a British IT developer, set up the online data platform used to collect and process company data. It also developed automatic scoring sheets and reports that fed into the scorecards.

Kummer & Herrman

Kummer & Herrman based in the Netherlands, design for identity, website and reports.

Studio September

Studio September based in the Netherlands, website development.

Ketchum

Ketchum, an integrated communications agency in Germany, is ATNI's public relations partner for this index.

WRENmedia

WREN*media*, a UK communication company did the language and copy editing of the report and scorecards.

Annex Global Index 2021

Members of the following groups have served in their personal capacities and in an advisory role. The views in this report do not necessarily reflect the views of these groups' members or of their institutions. The ATNI development team is responsible for the final scope and content of the Index.

Board

Paulus Verschuren

Chair of the Board of ATNI

Founder WorldFed NL; Former Special Envoy Food and Nutrition Security Ministry of Foreign Affairs, The Netherlands; Former Senior Director Unilever Global Health Partnerships; Former Executive Director International Life Sciences Institute – ILSI Europe

Lauren Compere

Managing Director, Boston Common Asset Management

Inge Kauer

Executive Director, Access to Nutrition Initiative

Marc Van Ameringen

Former Executive Director Global Alliance for Improved Nutrition (GAIN)

Paula Luff

CEO Viso Strategies Corporation; Board of Philanthropy New York; Senior Associate with the Project on Prosperity and Development at the Center for Strategic and International Studies

Kathy Spahn

President and Chief Executive Officer, Helen Keller International; Board member of InterAction, International Agency for the Prevention of Blindness (IAPB), and the Bernadotte Foundation for Children's Eyecare

Susanne Stormer

Vice President, Chief Sustainability Officer, Novo Nordisk, Denmark; Adjunct professor, Corporate Sustainability, Copenhagen Business School; Member of International Integrated Reporting Council.

ATNI Expert Group

The function of the Access to Nutrition Initiative Expert Group is to provide input into the development of the company assessment methodology and to review the analysis and Index report. This group consists of members with expertise in various aspects of nutrition (including both undernutrition and obesity and diet-related chronic diseases) and the role of the food and beverage industry when it comes to nutrition.

Chair of ATNI Expert Group: Shiriki Kumanyika

Professor Emerita of Epidemiology, University of Pennsylvania; Research Professor in Community Health & Prevention, Drexel University Dornsife School of Public Health

Boyd Swinburn

Professor, Population Nutrition and Global Health at the University of Auckland and Alfred Deakin; Professor and Director of the World Health Organization (WHO) Collaborating Centre for Obesity Prevention at Deakin University in Melbourne

Mike Rayner

Director, British Heart Foundation Health Promotion Research Group, University of Oxford

Linda Meyers

Senior Director (retired), Food and Nutrition Board, National Academies of Sciences, Engineering, and Medicine

Terry T-K Huang

Professor, School of Public Health, City University of New York

Mary Story

Associate Director for Academic Programs, Duke Global Health Institute
Director, Healthy Eating Research National Program, RWJF

Ajinomoto

Product categories assessed

Processed Meat and Seafood|Concentrates|Confectionery|Ready Meals|Rice, Pasta and Noodles|RTD Coffee|Sauces, Dressings, Condiments|Soup

Percentage of company global sales covered by Product Profile assessment
75-80%

Headquarters
Japan

Number of employees
34504

Type of ownership
Public



Product Profile ⓘ

Rank 14 / Score 3

Rank 22 / Score 2.8

Rank 14 (2018)

Rank 18 (2018) ⓘ

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 14

Score 3

Commitment

Performance

Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS** Ajinomoto's score has increased from 2.4 in 2018 to 3 out of 10 in 2021, ranking 14th (as in 2018). Since 2018, the company has improved its performance in five of the seven thematic areas of the Global Index, with the most significant improvements being seen in Category D 'Marketing', followed by Category B 'Products'.

- **GOVERNANCE:** Ajinomoto continues to place a strategic focus on health and wellbeing as part of the wider Ajinomoto Group's 'Creating Shared Value' (ASV) growth strategy, and complemented by its 'Group Shared Policy on Nutrition'. Since 2018, Ajinomoto has publicly recognized the targets set out in the World Health Organization (WHO) Global Action Plan for the Prevention and Control of NCDs. It identifies the unmet needs of priority populations through market research and priorities defined by relevant health and/or social care authorities in some of the markets in which it is active (Japan, Indonesia, Vietnam, and the Philippines). Ajinomoto's nutrition-related reporting is subject to independent external review.

- **PRODUCTS:** Ajinomoto has reformulated some of its products in Japan to cut salt content by 50 percent (using monosodium glutamate and other low-sodium salt ingredients which the company classifies as umami, for products like Yasashio), aligning with national dietary intake standards. The company is commended for developing and adopting a new, formal Nutrient Profile Model (NPM), the 'Ajinomoto Group Nutrient Profiling System (ANPS)'. The scoring method is based on the Australian Health Star Rating (HSR) system to guide its (re)formulation efforts for some of its products. In Malawi, Ajinomoto has invested in research on the efficacy of ready-to-use therapeutic foods for children with severe acute malnutrition. The company has also taken measures to reduce food loss and waste along the food supply chain.

- **ACCESSIBILITY:** The company has offered promotions on its low-sodium miso soup in Japan at the same rate as its higher-sodium version. In Vietnam, it continues to utilize its network of women's associations, through which it disseminates fortified products to vulnerable groups.

- **MARKETING:** Since 2018, Ajinomoto has developed a new responsible marketing policy for all consumers, the 'Group Shared Policy on Marketing Communications', in which it adheres to some of the principles set out by the International Chamber of Commerce (ICC) Framework for Responsible Food and Beverage Marketing Communications. The policy also specifies that the company will take "responsible actions in marketing communications aimed at children", such as to not exploit children's imaginations by using fantasy/animation, or mislead about the benefits following the use of the product.

- **LIFESTYLES:** To support Ajinomoto Group employees, the company offers employees a robust self-care program – the 'A-Health Solution Program' – that focuses on health visualization and lifestyle disease prevention. It has also introduced 'Karada kawaru Navi' (Body change Navi), an app that assesses an employee's wellbeing across four

Priority areas for improvement

- **GOVERNANCE:** Although Ajinomoto undertakes materiality assessments to identify opportunities to contribute to health and nutrition, it is encouraged to conduct specific nutrition-related business risk assessments and identify areas of concern to address in its global nutrition strategy. As in 2018, implementation of Ajinomoto's nutrition strategy is not audited by an internal audit department; a step the company could consider taking to assess the delivery of its strategy and commitments. The company is also advised to further report on its current performance against all objectives and commitments for tackling all forms of malnutrition.

- **PRODUCTS:** Ajinomoto is advised to set concrete product (re)formulation targets that are externally verifiable (does not rely on company-internal definitions or information for verification) for all relevant product categories. Although Ajinomoto has adopted a formal NPM based on the HSR, it has not provided evidence of how its own definition of healthy corresponds with the HSR definition of healthy (i.e., equal to a rating of 3.5 stars or higher). The company is encouraged to disclose the results of this benchmark, apply its ANPS to all product categories, and publish its full NPS. Ajinomoto can base its fortification approach on international guidance, such as Codex or WHO/Food and Agriculture Organization (FAO) Guidelines on Food Fortification, and only fortify products of high underlying nutritional quality or those that meet the nutrition criteria of its ANPS.

- **ACCESSIBILITY:** While Ajinomoto has adopted a 'Group Shared Policy on Product Accessibility', it could consider being explicit in referencing products that meet its nutrition criteria in its commitments. It is encouraged to develop concrete strategies with measurable targets to reach consumers with healthy products, particularly those with low-income and limited access, in all markets it is active in, and share evidence of actions taken. Currently, Ajinomoto does not extend its affordability and accessibility commitments to its fortified products aimed at addressing micronutrient deficiencies in priority populations. It is encouraged to do so and develop tailored strategies for reaching them in all its active markets.

- **MARKETING:** Ajinomoto can improve its public responsible marketing policy by explicitly covering all forms of marketing, such as point-of-sales or in-store and adhering to all the principles of the ICC Framework for Responsible Food and Beverage Marketing Communications. Although the company notes that it has a limited number of products that could be marketed to children, it is still encouraged to develop specific marketing commitments for children and teenagers, and/or explicitly state that it does not market to children at all in its responsible marketing policy. Furthermore, Ajinomoto is strongly urged to audit its compliance with its policy for all consumers.

- **LIFESTYLES:** Ajinomoto is encouraged to adopt a comprehensive parental leave policy that offers paid parental leave and appropriate working conditions and facilities to breastfeeding mothers in all markets it is active in. It is recommended the company commits to further improving the health and wellness of groups

axis (food, exercise, sleep, and stress) and provides health guidance based on an accurate picture of their lifestyle habits; and the impact of this program has been appraised via independent, third-party impact evaluations. Ajinomoto has also launched several consumer education programs adapted to the specific needs of priority populations in Japan and Malaysia (for the elderly), Vietnam (for school children, and Indonesia (for pregnant women); some of which have been co-implemented with stakeholder groups with relevant expertise.

- **LABELING:** Ajinomoto states its commitment to labeling nutrient information on the back-of-pack (BOP) in its 'Group Shared Policy on Package Description', adopted in 2017. The company has defined a labeling strategy with accompanying targets to reduce food loss and waste, and provides examples of initiatives taken. Furthermore, Ajinomoto states it will not place a nutrition and health claim on a product unless it meets the company's own formal internal Nutrient Profiling System (NPS).

- **ENGAGEMENT:** The company commits to play an active and constructive role in supporting governments' efforts to combat all forms of malnutrition, and provides examples of doing so in Vietnam and Japan. It also provides evidence of comprehensively engaging with scientific experts in developing its ANPS and nutrition policy.

across the food supply chain that are not its direct employees (e.g., small scale vendors) through nutrition-sensitive programs. To further enhance its consumer-oriented healthy eating and active lifestyle programs, Ajinomoto is advised to only support programs designed and implemented by independent expert organizations, and commission impact evaluations for them.

- **LABELING:** The company is advised to strengthen its FOP and BOP labelling commitments and policies to ensure that nutrition information is provided on all packaged food and beverage products according to the Codex Alimentarius guidance. ATNI recommends that Ajinomoto commits to not placing any health and nutrition claims on its products in countries where no national regulatory system exists, or is not as strict as Codex. Codex guidelines are in place to define the criteria that health and nutrition claims should meet prior to placing them on products. Therefore, in countries where no national regulatory system exists, Ajinomoto is advised to commit to using health and nutrition claims only when they comply with this Codex guideline.

- **ENGAGEMENT:** Ajinomoto is encouraged to develop a public responsible lobbying policy and commit to only lobby in support of measures designed to improve health and nutrition that have a solid grounding in independent, peer-reviewed science. It is recommended that the company increases transparency about its lobbying efforts on nutrition-related topics, and discloses its involvement in organizations that lobby on its behalf. To improve engagement on its nutrition strategy for addressing all forms of malnutrition, Ajinomoto could consider seeking a formal panel of experts with a broad knowledge base.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

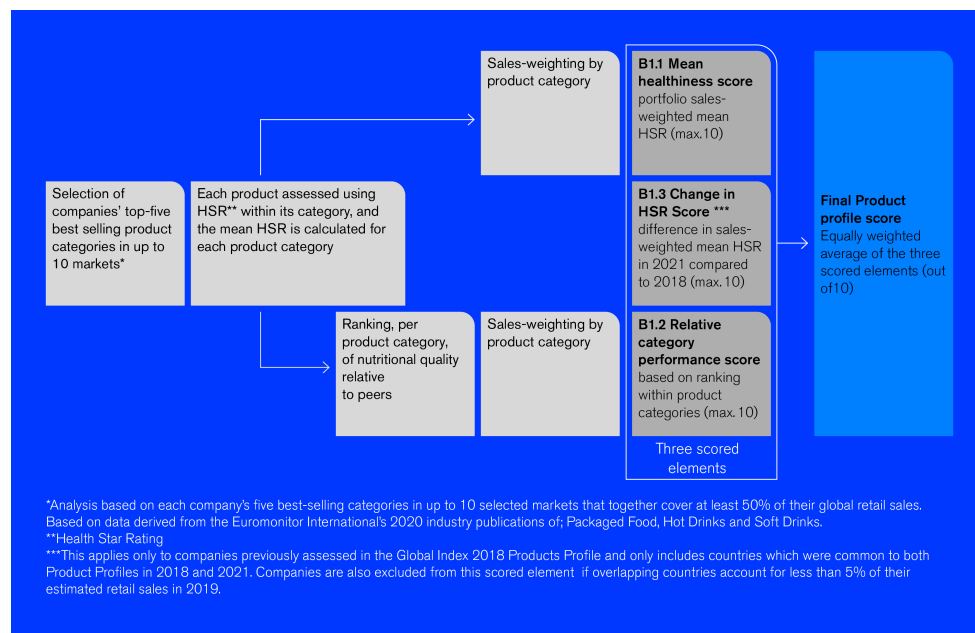


22

Rank 22 / Score 2.8

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



Ajinomoto has been assessed for the second time in the Global Index Product Profile. In the previous assessment, four of the company's markets were selected, and a total of 92 products analyzed – accounting for approximately 0-5% of global retail sales in 2017, excluding baby foods, plain tea, and coffee. In this Index, a total of 410 products have been analyzed across 4 of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 75-80% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

Brazil, Japan, Thailand and the USA are new countries included in this iteration. China, Hong Kong, South Africa and the UK were included in the 2018 Index but have been omitted this time. In 2018, a total of 3 categories were covered by the assessment, compared to 7 categories in 2021. Products from the 'Concentrates', 'Processed Meats and Seafoods', 'RTD Coffee', and 'Soup' categories are assessed in 2021 but were not in 2018.

In this Product Profile assessment, Ajinomoto scores 3.3 out of 10 (B1.1) in the mean healthiness element and 2.2 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers. This results in Ajinomoto obtaining an overall score of 2.8 out of 10 and ranking 22 out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	4 Countries included	Range of global sales included i	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥ 3.5 stars)	% retail sales healthy 2019 (≥ 3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥ 3.5 stars) i	No. products assessed	% products suitable	% sales from suitable
1.6	Brazil, Japan, Thailand, USA	75-80%	410	6%	8%	6%	403	2%	2%

- A total of 410 products manufactured by Ajinomoto, sold in 4 countries, covering 7 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 1.6 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 3.3 out of 10 for Ajinomoto. The company ranks 20 out of 25 companies in this first scored element (B1.1).
- Overall, 6% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥ 3.5). Together, these products accounted for an estimated 8% of Ajinomoto's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 6% of its global retail sales from healthy products in 2019.
- WHO nutrient profiling models (unscored): Only 2% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 2% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR>=3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) 1
Concentrates	38	0%	0.5	1.2	7th out of 7
Rice, Pasta and Noodles	14	0%	0.5	2.4	6th out of 6
Sauces, Dressings and Condiments	150	0%	0.9	2.5	11th out of 11
Soup	91	0%	0.9	2.5	7th out of 8
Processed Meat and Seafood	11	9%	2.2	3.1	7th out of 8
Ready Meals	99	21%	2.6	3	8th out of 9
RTD Coffee	7	14%	2.6	2.7	4th out of 6

- For Ajinomoto, 'Ready Meals' and 'RTD Coffee' were the best performing categories, where a total of 99 and 7 products respectively, obtained mean HSR of 2.6 out of 5. 'Concentrates' (0.5) and 'Rice, Pasta and Noodles' (0.5) had the lowest mean HSR of all product categories included for Ajinomoto.
- For seven out of seven categories assessed, Ajinomoto's products perform worse than the mean HSR of companies selling products in the same categories.
- Ajinomoto scores 2.2 out of 10 in this second scored element (B1.2) and ranks 25 out of 25 companies. This is based on its ranking compared to peers within the seven categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
TOTAL	0	0	0	0

Not applicable for this company. This third scored element applies only to companies assessed in both Indexes and takes into account only those countries included in both assessments. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.

Full Product Profile report:

https://acesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

Arla

Product categories assessed

Dairy|Sauces, Dressings, Condiments|Soup

Percentage of company global sales covered by Product Profile assessment

80-85%

Headquarters

Denmark

Number of employees

19174

Type of ownership

Cooperative



Product Profile ⓘ

Rank 5 / Score 5.1

Rank 7 / Score 6

Rank 11 (2018)

Rank 3 (2018) ⓘ

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 5

Score 5.1

Commitment

Performance

Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS** Arla is one of the few companies whose score has consistently improved since 2016, increasing from 3.3 in 2018 to 5.1 out of 10 in 2021. The company's overall ranking improved from 11th to 5th place. Since 2018, the company has improved its performance in six of the seven thematic areas of the Global Index. It has shown the greatest improvement in Category F 'Labelling', followed by Category D 'Marketing'. It has also improved the overall healthiness of its product portfolio with the second highest mean healthiness score (6.7 out of 10) - an indication of the nutritional quality of company's products in best-selling categories across major markets.

- **GOVERNANCE:** Arla's nutrition strategy falls under the 'Stronger People' part of its overall Sustainability strategy, which was launched in 2019 following the 'Good Growth 2020' strategy. It has also incorporated a 'Sustainable Diet' element, as defined by the Food and Agriculture Organization (FAO), in its business strategy. Furthermore, Arla commits to deliver more healthy foods by stating its aim to "incrementally increase healthy products by 60,000 tons by 2025, compared to 2019 levels", for products that meet its nutrition criteria.

- **PRODUCTS:** Arla has substantially improved its product reformulation efforts and the strength of its nutrient profiling model. It is one of the two companies in this Index that explicitly commits to only fortify products that meet its own nutrition criteria (as defined by its Nutrient Profiling Model (NPM)). Furthermore, Arla showed that its criteria for defining healthy products correspond with the Health Star Rating (HSR) ≥ 3.5 threshold of healthy (with less than 10 percent% deviation in the estimated percentage of healthy products). The company reported that, in 2019, 90 percent% of the Arla - branded products in the milk, yogurt and everyday cheeses categories complied with its nutrition criteria.

- **ACCESSIBILITY:** Arla makes companywide commitments to address the affordability and accessibility of all its healthy products. The company is focusing on addressing the needs of groups experiencing and/or at high-risk of undernutrition and micronutrient deficiencies through affordably priced dairy products; for example, in Bangladesh (Dano Daily Pushti) and Nigeria (Cool Cow). As a member of the GAIN Nordic Partnership, Arla Foods Ingredients seeks to develop affordable and nutritious foods in collaboration with local manufacturers.

- **MARKETING:** Since 2018, Arla has publicly disclosed its responsible marketing policy for all consumers and joined the EU Pledge on responsible advertising to children. Arla is the only company in this Index to specifically refer to children as persons under the age of 18 years, as defined by the Convention on the Rights of the Child in its policy, and has set specific provisions on communicating to children. Arla has also taken steps to understand and reach groups experiencing or at high-risk of malnutrition, with appropriate products through tailored marketing in some low- and middle-income countries.

- **LIFESTYLES:** Arla commits to providing parental leave for a minimum of 14 weeks, in line with International Labor Organization (ILO) recommendations. It has implemented

Priority areas for improvement

- **GOVERNANCE:** Arla is encouraged to strengthen the quality of its nutrition-related reporting by highlighting how its nutrition activities are adding value to the business in its annual reports, and publish nutrition commentary that is independently, externally verified. While it currently does so in Bangladesh, Arla can improve its nutrition strategy for addressing the needs of priority populations by conducting market research to assess unmet needs of priority populations in all markets where it is active. The company is encouraged to develop a strategic commercial approach to addressing nutrition-related unmet needs of priority populations; for example, by conducting a strategic review. Arla should also explicitly and publicly recognize the targets set out in the World Health Organization (WHO) Global Action Plan for the Prevention and Control of NCDs 2013-2020.

- **PRODUCTS:** Arla is encouraged to set product reformulation targets for sodium, saturated fat and added sugar that are externally verifiable (does not rely on company-internal definitions or information for verification), and publish its NPM in a peer-reviewed journal or explicitly referring to WHO or government-endorsed models to allow stakeholders to assess and understand it.

- **ACCESSIBILITY:** Arla is advised to expand and develop its strategy for improving the affordability and accessibility of its healthy products to cover all the markets where it is active, including middle- and high-income markets. As in 2018, Arla is still encouraged to increase its disclosure of examples on discounts, price promotions or coupons offered in relation to healthy products. The company is also encouraged to build on its affordability strategy in Bangladesh and Nigeria, and use that experience to also reach consumers with limited access to nutritious foods in low income rural and urban areas in other markets.

- **MARKETING:** Arla can further strengthen its responsible marketing to children policy by making all provisions applicable to under 18 years-old and committing to never use promotional games, toys, vouchers, etc. in their marketing to children and/or teens. The company can also be more stringent in setting the audience threshold to restrict its advertising on measured media to avoid reaching children by decreasing the threshold from 30% to 25%.

- **LIFESTYLES:** Arla should conduct impact evaluations of its health and wellness programs and incorporate a focus on nutrition. For its programs aimed at supporting consumers' nutrition education, and healthy diet-oriented and active lifestyle programs, the company is encouraged to specifically adapt these to the needs and backgrounds of priority populations and conduct independent evaluations to measure outcomes, globally.

- **LABELING:** Arla is encouraged to set a target for and report progress on the adoption of its new interpretive government-endorsed front-of-pack labeling scheme, globally, and to commit to not placing nutrition and health claims on products unless they meet the nutrition criteria of a government-endorsed NPS.

the Arla Foods Parental Policy (gender neutral), which establishes minimum standards of 14 weeks paid parental leave that must be implemented at the Arla Group workplaces globally by the end of 2021. Since 2018, it has developed its commitments and practices to support breastfeeding mothers in the workplace by, for example, facilitating breastfeeding mothers with rooms and breaks to express breastmilk during work hours.

- **LABELING:** Arla has demonstrated a substantial improvement in its practices related to the labeling of nutrients and the use of health claims. Since 2018, the company has adopted a new labeling policy, committing to display nutritional information on both its front-of-pack (FOP) and back-of-pack (BOP), and has introduced government-endorsed interpretative labeling on some of its products. Arla is also one of only three companies that commits to not undermine health warning messages/labels in countries with mandatory FOP labeling systems. The company states that it will only use nutrition and health claims when a product meets the nutrition criteria of its own internal NPM, and it has comprehensive guidelines in place that comply with Codex Alimentarius regarding the use of claims in countries where no national regulatory system exists.

- **ENGAGEMENT:** Arla is commended for having a formal panel of external experts in place, its 'Scientific Advisory Board', consisting of professors at Copenhagen and Aarhus Universities, to advise on the design of its nutrition strategies, policies and programs to prevent and address obesity and diet-related chronic diseases. Arla Foods Ingredients also partners with GAIN and SUN Business Network to address malnutrition in priority populations, such as in low-income communities in Ethiopia.

- **ENGAGEMENT:** Arla is advised to develop a publicly available responsible lobbying policy, and commit to only lobby in support of measures designed to improve health and nutrition that have a solid grounding in independent, peer-reviewed science. The company is encouraged to increase transparency about its lobbying efforts on nutrition-related topics and measures to prevent and address obesity and diet-related chronic diseases, as well as disclose its involvement in trade associations for lobbying. While Arla provides examples of supporting governments' efforts to combat malnutrition in some countries such as Denmark and UAE, it is encouraged to make a company-wide commitment to doing so in all its markets.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

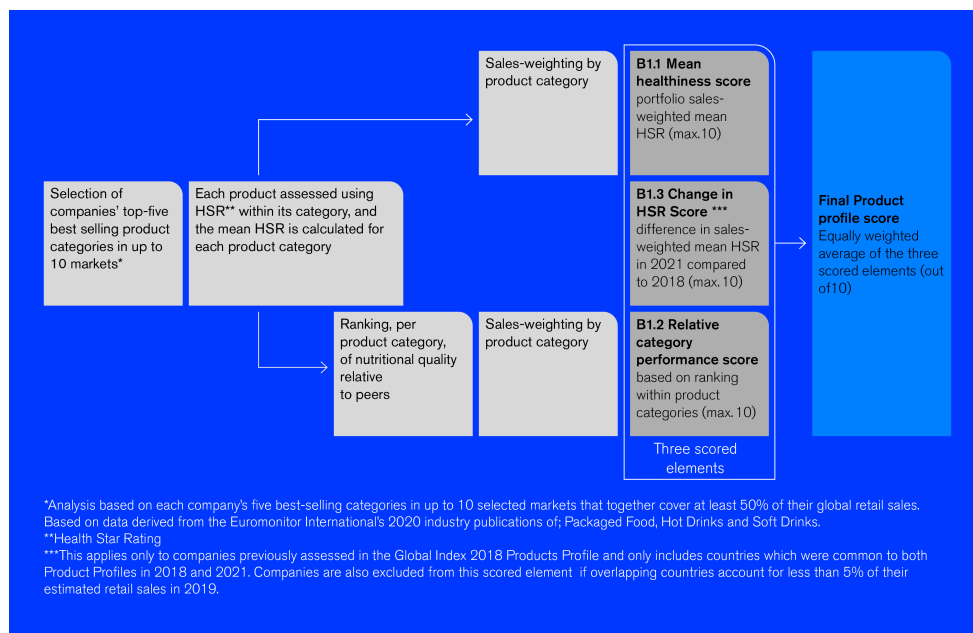


7

Rank 7 / Score 6

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



Arla has been assessed for the second time in the Global Index Product Profile. In the previous assessment, four of the company's markets were selected and a total of 108 products analyzed accounting for approximately 10-15% of global retail sales in 2017, excluding baby foods, plain tea and coffee. In this Index, a total of 1072 products have been analyzed across 10 of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 80-85% of the company's global retail sales, excluding baby foods.

Canada, Denmark, Finland, Germany, Russia and Sweden are new countries included in this iteration. In 2018, only one product category was covered by the assessment, compared to three categories in 2021. Products from the 'Sauces, Dressings and Condiments' and 'Soup' categories are assessed in 2021 but were not in 2018.

In this Product Profile assessment, Arla scores 6.7 out of 10 (B1.1) in the mean healthiness element, 7.2 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers, and 4 out of 10 (B1.3) for changes in nutritional quality (mean HSR) over time. This results in Arla obtaining an overall score of 6.0 out of 10 and ranking seventh out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	10 Countries included	Range of global sales included i	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥3.5 stars)	% retail sales healthy 2019 (≥3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥3.5 stars) i	No. products assessed	% products suitable	% sales from suitable
3.3	Australia, Canada, Denmark, Finland, Germany, Hong Kong, Russia, Sweden, UK, USA	80-85%	1072	55%	60%	56%	1073	31%	34%

- A total of 1072 products manufactured by Arla, sold in 10 countries, covering 3 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 3.3 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 6.7 out of 10 for Arla. The company ranks 2 out of 25 companies in this first scored element (B1.1).

- Overall, 55% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥3.5). Together, these products accounted for an estimated 60% of Arla's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby foods). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 56% of its global retail sales from healthy products in 2019.

WHO nutrient profiling models (unscored): 31% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 34% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR ≥3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) i
Dairy	1037	56%	3.2	2.9	6th out of 18
Sauces, Dressings and Condiments	21	5%	2.6	2.5	5th out of 11
Soup	14	14%	3.1	2.5	4th out of 8

- For Arla, 'Dairy' was the best performing category, where a total of 1037 products analyzed obtained mean HSR of 3.2 out of 5. 'Sauces, Dressings and Condiments' (2.6) had the lowest mean HSR of all product categories included for Arla.
- For all three categories assessed, Arla's products perform better than the mean HSR of companies selling products in the same categories. The company performs best compared to peers in the product category 'Soup'.
- Arla scores 7.2 out of 10 in this second scored element (B1.2) and ranks 8 out of 25 companies. This is based on its ranking compared to peers within the 3 categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
Australia	9	17	1.2	1
Hong Kong	8	12	1.1	1
UK	73	140	3.2	3.4
USA	18	59	1.9	2.5
TOTAL	108	228	3	3.2

- Arla showed an increase in mean HSR between the 2018 and 2021 Product Profiles (mean HSR=3.0 to 3.2). The change in HSR score only takes into account the eight countries included in both 2018 and 2021 assessments. For Arla, the change appears to be driven by an increase in the mean HSR for UK 'Dairy' products, because a larger number of yoghurt products were included in 2021 versus 2018.
- Adjusting scores by country sales weighted estimates (which gives more weight to company's largest markets), Arla achieves an increase of 0.2 in mean HSR between 2018 and 2021, resulting in a score of 4 out of 10 on this element using the scoring system set out in ATNI's methodology.

Full Product Profile report:

https://accesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

BRF

Product categories assessed

Processed Meat and Seafood|Dairy|Ice Cream and Frozen Desserts|Processed Fruit and Vegetables|Ready Meals

Percentage of company global sales covered by Product Profile assessment

90-95%

Headquarters

Brazil

Number of employees

88028

Type of ownership

Public



Product Profile

Rank 18 / Score 1.7

Rank 19 / Score 3.5

Rank 18 (2018)

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 18 Score 1.7

Commitment Performance Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS:** The company has increased its score since 2018 from 0.5 to 1.7, although its ranking remains the same. This reflects new strategic commitments observed most notably in Governance (Category A).
- **GOVERNANCE:** Since 2018, BRF has made a public commitment to delivering more healthy foods. In its 2019 Annual Report, the company states that innovation is one of its key tools to develop healthier products, and it is also used to help mitigate potential negative impacts on consumer health. The company's improvement in Governance is also driven by reporting in accordance with the Global Reporting Initiative (GRI) standards.
- **PRODUCTS:** Although it has not defined targets to reduce levels or achieve lower stated levels of nutrients of concern, BRF reports having strategies to reduce fat, sodium, and sugar content in its products, in accordance with applicable regulations and international standards. BRF works with the Brazilian Food Industry Association (ABIA), to accelerate produce (re)formulation strategies. The company also discloses that none of its products contain trans fats, apart from those naturally present in dairy products and beef.
- **LIFESTYLES:** BRF has slightly strengthened its performance in supporting employees and consumers with healthy lifestyles (Category E). The company states: "Wellness and protection of employee integrity are among the company's overall priorities." The company has established BRF Health Centers, in which it supports pregnant women, newborn health, vaccination campaigns, and promoting healthy living habits, among others.
- **ENGAGEMENT:** The company has published a 'Transparency Manual', in which it commits to engage with stakeholders ethically and transparently, and includes explicit measures preventing bribery and corruption in its relations with public officials, including the offering and receiving of gifts, hospitality or other financial and in-kind incentives. These measures are also expected of its direct and indirect suppliers, and business partners. BRF also showed evidence of consulting an academic expert in its home market on its nutrition and health approach.

Priority areas for improvement

- **GOVERNANCE:** The company is encouraged to adopt and disclose a formal nutrition policy that specifies how it contributes to addressing all forms of malnutrition (including micronutrient deficiencies where relevant) through its commercial strategy and activities. Although the company's reporting is relatively strong, BRF could consider improving links between its strategies and nutrition-related SDGs.
- **PRODUCTS:** BRF is advised to define what products are 'healthy' based on objective nutrition criteria (using an internationally recognized Nutrient Profiling Model (NPM)) and use it to track and report the proportion of sales it derives from healthy products. The company is also encouraged to set SMART product formulation and/or reformulation targets to help achieve a healthier product portfolio.
- **LABELING:** The company is encouraged to increase transparency around its labeling and claims practices, and could use an interpretive front-of-pack (FOP) labeling system to ensure comprehensive nutrition information is provided on all packaged food and beverage products. ATNI recommends that BRF shows industry best practice by publishing a labeling and claims policy with relevant commitments in alignment with Codex Alimentarius guidelines, and in compliance with national regulations in the countries in which it operates.
- **LABELING:** The company is advised not to use additional interpretive labelling or other information FOP that directly relates to the message of mandatory FOP labelling (which may confuse consumers or modify the effect of the mandatory labelling).
- **ACCESSIBILITY:** It is recommended that BRF adopts and publishes a policy to improve the affordability and physical accessibility of products that meet healthy criteria, and to reach low-income populations or populations in rural or urban areas that lack regular access to healthy, affordable food.
- **MARKETING:** The company has strategies towards responsible marketing to children in Brazil. The 'Brazil Public Commitment on Food and Beverage Advertising to Children', which includes 11 companies (including BRF), was expanded and strengthened in 2016 with the commitment to not advertise food or beverages to children under the age of 12 – apart from products whose nutritional profile meets specific criteria. However, there is no evidence that the company conducts regular independent audits to assess compliance with its marketing to children commitment. BRF is advised to formalize its marketing to children's commitments by publishing a company policy, covering all children under the age of 18, primary and secondary schools, and places where children typically gather (e.g., sport facilities), as recommended by WHO/UNICEF. Overall, the company is encouraged to fully subscribe to the responsible marketing principles of the ICC.
- **LIFESTYLES:** While BRF's performance in category E has improved slightly since 2018, it is encouraged to make a commitment to improve the health and wellness of groups across the food supply chain, and ensure its

existing programs are available to all employees. The company could consider being more transparent about its parental leave policies, globally, including support for breastfeeding.

- **ENGAGEMENT:** The company is encouraged to publicly commit to engage with governments, political parties, policymakers, and policymaking bodies only in support of measures to improve health and nutrition, and only with a basis in objective, peer-reviewed science. It is recommended that BRF strengthens its transparency on lobbying practices by disclosing its memberships of trade associations outside of its home market, its spending on lobbying and political donations, and its lobbying positions on key nutrition topics. It is also encouraged to actively and constructively engage with governments in their efforts to address malnutrition in their respective markets.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

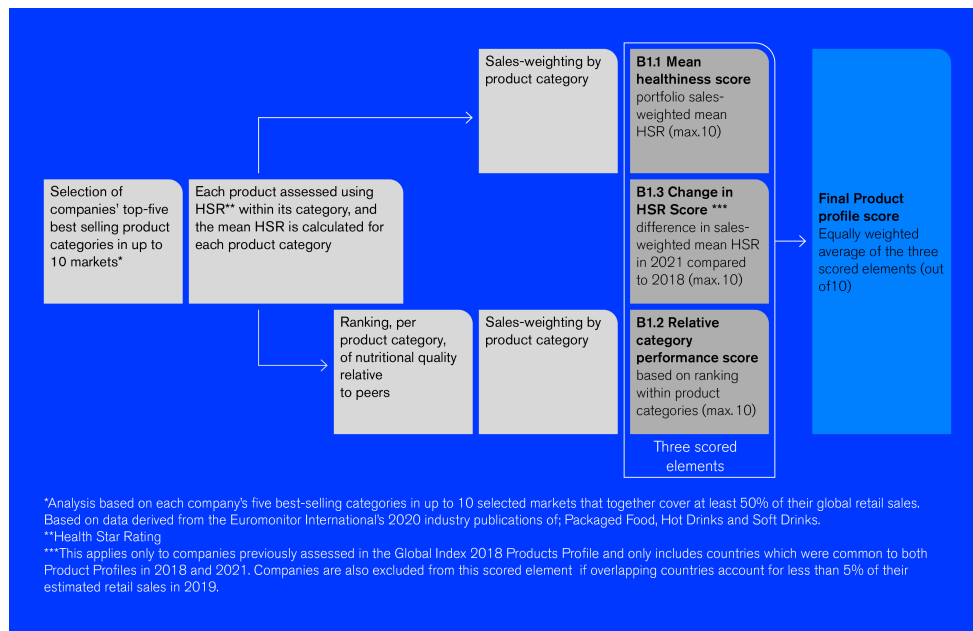


19

Rank 19 / Score 3.5

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



BRF has been assessed for the first time in the Global Index Product Profile. In this Index, a total of 143 products have been analyzed across one of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 90-95% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

In this Product Profile assessment, BRF scores 4.7 out of 10 (B1.1) in the mean healthiness element and 2.4 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers. This results in BRF obtaining an overall score of 3.5 out of 10 and ranking 19 out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	1 Countries included	Range of global sales included i	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥ 3.5 stars)	% retail sales healthy 2019 (≥ 3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥ 3.5 stars) i	No. products assessed	% products suitable	% sales from suitable
2.3	Brazil	90-95%	143	27%	29%	29%	147	3%	5%

▪ A total of 143 products manufactured by BRF, sold in one country, covering 5 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 2.3 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 4.7 out of 10 for BRF. The company ranks 16 out of 25 companies in this first scored element (B1.1).

WHO nutrient profiling models (unscored): Only 3% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 5% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

▪ Overall, 27% of distinct products assessed were found to meet the HSR healthy threshold ($HSR \geq 3.5$). Together, these products accounted for an estimated 29% of BRF's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 29% of its global retail sales from healthy products in 2019.

B1.2. Product Category Results

	No. products analyzed	% products healthy ($HSR \geq 3.5$)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) i
Dairy	9	44%	2.7	2.9	15th out of 18
Ice Cream and frozen Desserts	2	0%	1.8	2	5th out of 7
Processed Meat and Seafood	74	19%	1.8	3.1	8th out of 8
Ready Meals	57	35%	2.8	3	6th out of 9
Processed Fruits and Vegetables	1	100%	5	4.1	1st out of 4

- For BRF, 'Processed Fruit and Vegetables' was the best performing category, where the one product analyzed obtained mean HSR of five out of five. 'Ice Cream and Frozen Desserts' (1.8) and 'Processed Meat and Seafood' (1.8) had the lowest mean HSR of all product categories included for BRF.

- For four out of the five categories assessed, BRF's products perform worse than the mean HSR of companies selling products in the same categories.
- BRF scores 2.4 out of 10 in this second scored element (B1.2) and ranks 23 out of 25 companies. This is based on its ranking compared to peers within the 16 categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
TOTAL	0	0	0	0

Not applicable for this company. This third scored element applies only to companies assessed in both Indexes and takes into account only those countries included in both assessments. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.

Full Product Profile report:

https://acesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

Campbell

Product categories assessed

Baked Goods|Juice|Sauces, Dressings,
Condiments|Soup|Savory Snacks

Percentage of company global sales covered by Product Profile assessment

75-80%

Headquarters

U.S.

Number of employees

19000

Type of ownership

Public



Product Profile ⓘ

Rank 14 / Score 3

Rank 12 / Score 4.5

Rank 10 (2018)

Rank 5 (2018) ⓘ

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 14

Score 3

Commitment

Performance

Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **GOVERNANCE:** In the 2021 Index, Campbell has improved in recognizing its role in tackling the global challenges of increasing levels of obesity and diet-related chronic diseases. It now commits to address the SDGs and priorities set out in the World Health Organization (WHO) Global Action Plan for the Prevention and Control of Non-Communicable Diseases 2013-2020; a great improvement from 2018. It has expanded this commitment to show clear reporting on current performance against all objectives and targets.

- **GOVERNANCE:** The CEO is formally accountable for implementing the company's nutrition strategy. Campbell publicly discloses an annual internal audit of this nutrition strategy, which is approved by the Board of Directors.

Campbell now conducts nutrition-related risk assessments at least every two years, an improvement since 2018.

- **PRODUCTS:** Campbell commits to offering consumers "nutrition and wellness choices" and uses three definitions and sets of thresholds for the composition of such products: 1) products with limited negative nutrients; 2) products that promote positive nutrition; and 3) healthy products. It has a set of thresholds per relevant nutrient for each of the types referred to, developed with advice from experts and aligned to national dietary guidelines. Campbell has strengthened its methods to calculate the overall nutritional quality of its products and categories by committing to use its own precursor to a Nutrient Profiling Model (NPM). The company has publicly disclosed that they use this NPM to track progress and highlight how they perform against nutrition recommendations. In addition, the company publicly reveals the percentage of the company's sales of 'healthy' products and the total number, or the change in percentage, of the number of new healthy products.

- **ACCESSIBILITY:** Concerning affordability and accessibility, Campbell provides evidence or examples of improving the physical accessibility of healthy products that address undernutrition and micronutrient deficiencies, through non-commercial activities.

- **MARKETING:** Since the 2018 Index, Campbell has improved on its commitments to responsible marketing to children. The company commits to only market products meeting the Children's Food and Beverage Advertising Initiative's (CFBAI) category-specific uniform nutrition criteria to children under 12 years. In schools with children over 12 years the company only offers products aligned with USDA smart snacks and CFBAI criteria. The company has published its pledge in full and audits and discloses its compliance. Regarding responsible marketing to all consumers, Campbell publicly discloses its adherence to the International Chamber of Commerce (ICC) framework.

- **LABELING:** Compared to 2018, Campbell has advanced in product labelling. The company now commits to and discloses its compliance with Codex Alimentarius Guidelines for use of Nutrition and Health Claims in countries where no national regulatory system exists.

- **ENGAGEMENT** The company is commended for having a formal panel of experts in place, consisting of food and nutrition scientists from prominent universities and private

Priority areas for improvement

- **SCORES AND RANKS:** Campbell ranks 14th in the Global Index with a score of 3.0 out of 10. Although Campbell scores above average on Governance and Labeling and shows a consistent score in marketing, ATNI found that the company's performance in other categories leaves room for significant improvement. The company could make considerable improvements in Accessibility, Lifestyles and Engagement in particular.

- **GOVERNANCE:** Campbell has not scored well on its efforts to include undernutrition and priority populations at risk of malnutrition in its overall strategies. As such, the company is advised to address the needs of priority populations through healthy products. Campbell could still improve further in Governance by including future targets, challenges, and reports on impact.

- **PRODUCTS:** The company is advised to strengthen its commitments on the formulation or reformulation of products. Campbell has identified a need for calorie reduction. To improve, the company could consider publicly disclosing evidence of thresholds or targets. In addition, as in 2018, the company does not have targets to reduce the levels of saturated fats or sugar in its products, nor to increase levels of whole grains or fruits, vegetables, nuts, and legumes (FVNL) to any of its products. The company is advised to strengthen its product formulation commitments by developing targets that are global in scope, include all product categories, and define specific baselines and target years to achieve them. The company is also encouraged to publicly report on its progress annually.

- **PRODUCTS:** Although the company has implemented a precursor to an NPM to determine the healthiness of its products, when considering (re)formulation, Campbell is encouraged to follow (inter)national or regional dietary guidelines and adopt and publish a government-endorsed NPM. In addition, the company is encouraged to base the fortification of its products on international Codex guidelines, and comply with national regulations in the countries in which it operates.

- **ACCESSIBILITY:** The company is encouraged to extend its efforts to improve accessibility of healthy products to go beyond non-commercial activities and have a stronger commercial focus.

- **MARKETING:** As in 2018, Campbell has provided evidence that its global policy on responsible marketing remains in place. However, it does not publicly disclose to which media types this applies. To improve in this area, ATNI recommends that the company discloses this, further commits to ensuring the commercial purpose of marketing communications is transparent and recognizable as an advertisement, and clearly displays the company or brand name when advertising on virtual media.

- **MARKETING:** The company commit to only market foods meeting the CFBAI's category-specific uniform nutrition criteria to not market products to children under 12 years and restricts advertising to children below the age of six. However, to shield children, the company is advised to improve on this by committing to not deploy children, influencers, and fantasy and animated characters in its

organizations, to advise the company on their approach to addressing obesity and diet-related chronic diseases. In 2020, for example, this panel helped finalize the company's corporate position paper on sodium.

marketing, and incorporate a responsible marketing policy regarding the use of promotional toys, games, vouchers, and competitions. The company could additionally consider extending its compliance auditing to all audiences, globally. The company could strengthen its policies regarding marketing to children by committing to not market its products in places popular with children (not just schools). Although Campbell now audits and discloses its policy compliance, to achieve best practice in this area, the company could consider extending this to all audiences globally, not just children in its major markets.

- **LIFESTYLES:** The company does not show evidence of programs to support its employees' wellness and health. Campbell does have programs in place to aid employees with mental health; however, they do not extend this to include nutrition. The company is strongly encouraged to incorporate programs for its employees and their families, and improve on performance and transparency in this area. And, although breastfeeding mothers are offered flexible work hours and breastfeeding rooms, ATNI recommends the company considers adopting a global policy with a standard period of paid maternity leave and facilities, consistent in all markets.

- **LABELING:** In 2018, Campbell was encouraged to adopt a global policy that commits to using an interpretative front-of-pack (FOP) labeling format. So far, the company commits to show numeric information, FOP with a percentage relating to Guideline Daily Allowance for all nutrients. It also discloses this only for major markets, and it is recommended that this be expanded globally. Regarding the rollout of its FOP labeling commitments, the company is advised to extend this to all products and markets globally, and to refer to an NPM to assess product healthiness prior to using claims.

- **ENGAGEMENT:** The company is advised to commit to only lobby in support of measures designed to improve health and nutrition that have a solid grounding in independent, peer-reviewed science. They could consider developing adequate internal controls to ensure their lobbying activities align with company policy. The company is also encouraged to provide greater disclosure around its lobbying efforts on nutrition-related topics, and on measures to prevent and address obesity and diet-related chronic diseases.

- **ENGAGEMENT:** Unlike in 2018, the company did not provide evidence of engaging with specific stakeholders to develop its nutrition strategy, policies and/or programs, or of any partnerships with international initiatives/organizations to address malnutrition in priority populations. Campbell is encouraged to conduct well-structured and focused engagement with a variety of independent stakeholders that have expertise in nutrition and addressing malnutrition, in order to strengthen their strategies and policies.

Category Analysis

Commitment **Performance** **Disclosure**

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment **Performance** **Disclosure**

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment **Performance** **Disclosure**

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

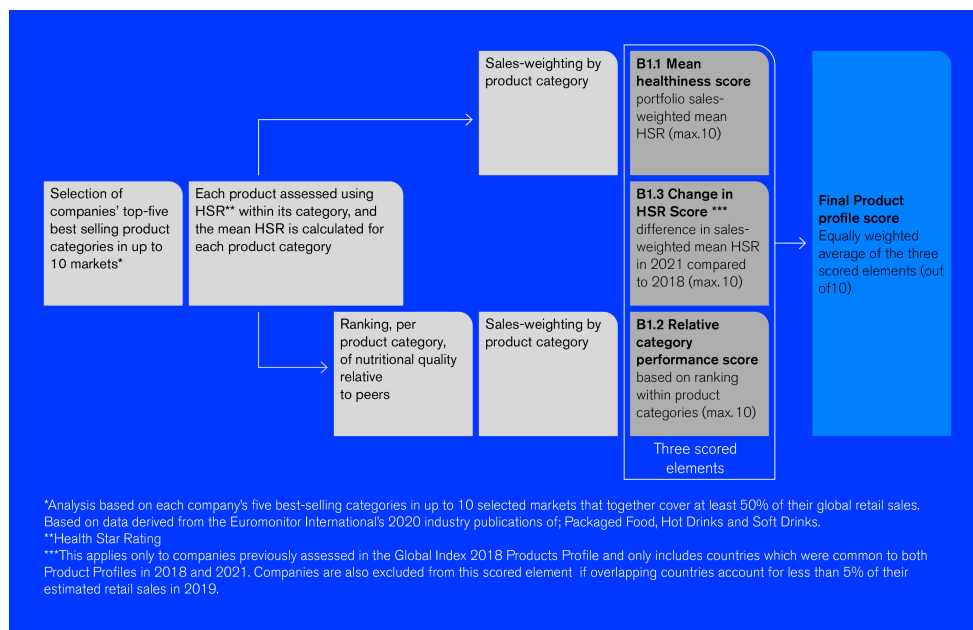


12

Rank 12 / Score 4.5

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



Campbell has been assessed for the second time in the Global Index Product Profile. In the previous assessment, seven of the company's markets were selected, and a total of 1,469 products analyzed – accounting for approximately 80-85% of global retail sales in 2017, excluding baby foods, plain tea, and coffee. In this Index, a total of 1158 products have been analyzed across 3 of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for almost 75-80% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

Canada is the only new country included in this iteration. Australia, Hong Kong, New Zealand, the UK and India were included in the 2018 but have been omitted this time. In 2018, a total of 7 product categories were covered by the assessment, compared to 5 categories in 2021. Products from the 'Ready Meals' and 'Sweet Biscuits, Snack Bars and Fruit Snacks' were assessed in 2018 but are not in 2021.

In this Product Profile assessment, Campbell scores 5.9 out of 10 (B1.1) in the mean healthiness element and 7.7 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers, and 0 out of 10 (B1.3) for changes in nutritional quality (mean HSR) over time. This results in Campbell obtaining an overall score of 4.5 out of 10 and ranking 12 out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	3 Countries included	Range of global sales included ①	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥3.5 stars)	% retail sales healthy 2019 (≥3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥3.5 stars) ①	No. products assessed	% products suitable	% sales from suitable
2.9	Canada, Mexico, US	75-80%	1158	49%	42%	45%	1159	2%	2%

- A total of 1,158 products manufactured by Campbell, sold in 3 countries, covering 5 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 2.9 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 5.9 out of 10 for Campbell. The company ranks 7 out of 25 companies in this first scored element (B1.1).

WHO nutrient profiling models (unscored): Only 2% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 2% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

- Overall, 49% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥3.5). Together, these products accounted for an estimated 42% of Campbell retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 45% of its global retail sales from healthy products in 2019.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR >= 3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) 1
Baked Goods	126	63%	3.2	2	1st out of 9
Juice	91	46%	3.3	3.2	5th out of 8
Sauces, Dressings and Condiments	135	59%	3.2	2.5	3rd out of 11
Savoury Snacks	331	28%	2.5	2.2	3rd out of 8
Soup	475	57%	3.3	2.5	3rd out of 8

▪ For Campbell, 'Juice' (91 products analyzed) and 'Soup' (475 products analyzed) were the companies best performing categories, receiving a score of 3.3 according to the HSR algorithm. The next best performing categories were 'Baked goods' and 'Sauces, Dressings and Condiments', whereby 126 and 135 products were analyzed, respectively. Both categories obtained a mean HSR of 3.2. Savoury Snacks (2.5) had the lowest mean HSR of all product categories included for Campbells.

▪ For all of the 5 categories assessed, Campbell products perform better than the mean HSR of companies selling products in the same categories. The company performs best compared to peers in the 'Baked Goods' product category.

▪ Campbell scores 7.7 out of 10 in this second scored element (B1.2) and ranks 6 out of 25 companies. This is based on its ranking compared to peers within the five categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
Mexico	40	81	3.7	3.9
USA	937	933	3	2.9
TOTAL	977	1014	3	2.9

- Among the 18 companies for which this third scored element was applicable, Campbells showed a slight decrease in mean HSR between the 2018 and 2021 Product Profiles (mean HSR=3.0 to 2.9). The change in HSR score only takes into account the two countries included in both 2018 and 2021 assessments. For Campbell, the decrease observed in mean HSR between 2018 and 2021 is likely attributed to some key changes in category sales, such as an increase in the proportion of sales deriving from the 'Savoury Snacks' (from 15% to 41%), with a subsequent decrease in the proportion of sales deriving from healthier categories such as 'Soup' and 'Juice'. This large change in the 'Savoury Snacks' category is likely a result of Campbell's purchasing of Snyder's-Lance in 2018.

- Adjusting scores by country sales weighted estimates (which gives more weight to company's largest markets), Campbell achieves a decrease of 0.1 (mean HSR=3.0 to 2.9) in mean HSR between 2018 and 2021 resulting in a score of 0 out of 10 (B1.3) on this element using the scoring system set out in ATNI's methodology.

Full Product Profile report:

https://accesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

Coca-Cola

Product categories assessed

Asian Speciality Drinks|Bottled Water (Other)|Bottled Water (Pure)|Carbonates|Concentrates|Dairy|Juice|RT Coffee|RTD Tea|Sports Drinks|Energy Drinks

Percentage of company global sales covered by Product Profile assessment
50-55%

Headquarters
U.S.

Number of employees
700000

Type of ownership
Public



Product Profile ⓘ

Rank 11 / Score 3.4

Rank 22 / Score 2.8

Rank 13 (2018)

Rank 14 (2018) ⓘ

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 11

Score 3.4

Commitment

Performance

Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS:** The score of Coca-Cola has increased from 3.0 in 2018 to 3.4 out of 10 in 2021 and its ranking has improved from 13th to 11th place. Since 2018, the company has improved its performance by making an explicit commitment to make its products more nutritious by providing vitamins, minerals and electrolytes, while also introducing more dairy and plant-based beverages, and has strengthened its performance in some categories, most notably on Labelling (Category F).
- **GOVERNANCE:** Coca-Cola continues to support the nutrition-related SDGs. As part of its strategy of becoming a 'total beverage company', it reports four areas of action: a) reducing added sugar; b) making smaller packages; c) offering more drinks with additional nutrition; and, d) giving people the right information. Although this illustrates the company has a strategic focus on nutrition and health, Coca-Cola is strongly encouraged to adopt a comprehensive nutrition policy.
- **PRODUCTS:** Coca-Cola has improved transparency on its nutrition-related reporting and has continued its efforts to reduce sugar. Coca-Cola reports that its low- or no-sugar beverages account for about 45 percent of products in the company's global portfolio (compared to 30 percent reported in ATNI's Global Index 2018), and about 29 percent of its global sales in volume. The company states that the average sugar per 100ml in its beverages decreased by four percent in 2019.
- **PRODUCTS:** Despite limited public disclosure, Coca-Cola has shared with ATNI relevant examples of products that might help address undernutrition through fortification with micronutrients – a positive development since 2018. In 2018, the company launched a clinically-tested micronutrient-fortified beverage in India, 'Minute Maid Vitingo', which aims to address iron deficiency in children in-line with country priorities; and this product was highlighted in ATNI's India Spotlight Index 2020. However, the company did not provide evidence on how the product is having an impact. Another example is 'NutriForce' juices which, according to the company, deliver one third of the nutrient reference values (NRVs) for key nutrients that support growth and development in school-aged children. The company shared with ATNI that NutriForce has been launched in Cambodia, India, Indonesia, Mexico, Pakistan, the Philippines, and Thailand, and generally includes iron, zinc, vitamin A, vitamin B12, calcium, and folic acid.
- **MARKETING:** The company's relatively strong performance on responsible marketing is mostly attributed to its 'marketing to children's arrangements' for digital media. The company provided evidence of having a response mechanism to ensure corrective measures are taken regarding any non-compliance with its marketing policy through internal business unit audits. Notably, in Australia, the company goes beyond its commitment by not commercially advertising in or near (within 300 meters) primary or secondary schools. The company is encouraged to expand this commitment globally.
- **LIFESTYLES:** Regarding community-supporting initiatives towards healthy eating and active lifestyles, the company provides evidence that some programs are

Priority areas for improvement

- **GOVERNANCE:** Coca-Cola is encouraged to formally adopt (in a public document or policy) a nutrition strategy covering all forms of malnutrition and groups affected and to more explicitly include nutrition-related Key Performance Indicators (KPIs) in its sustainability agenda. ATNI advises this strategy is approved by the Board of Directors and its delivery subjected to audits and annual management reviews. The company could consider further improving its nutrition governance by linking CEO compensation to performance on its sugar-reduction and portfolio transformation strategies.
- **GOVERNANCE:** Coca-Cola has not improved its transparency on how nutrition considerations play a role in mergers and acquisitions, and how much of its sales are derived from healthy products (apart from the current disclosure on the proportion of beverages with low- or no-sugar mentioned in 'main areas of strength'). This represents an important opportunity for the company, as it continues to expand its portfolio with new product categories, for example, with the acquisition of Chi Ltd in Nigeria in 2019, which includes a range of affordable juice and dairy drinks.
- **GOVERNANCE:** The company's annual report and selected sustainability metrics are externally verified. However, nutrition-related indicators are not included. Coca-Cola is strongly encouraged to independently verify the proportion of the company's global portfolio consisting of low- or no-sugar beverages and preferably the overall proportion of 'healthy' products. To report on the latter, the company is advised to formally adopt a Nutrient Profiling Model (NPM) to define 'healthy', or publicly align the number of low- or no-sugar beverages with external benchmarks to ensure these products support healthy diets as much as possible.
- **PRODUCTS:** The company shared with ATNI that 21 percent of its products launched in the last three years have been of smaller portion size. Coca-Cola is encouraged to research and publicly disclose the impacts on consumer portion control.
- **PRODUCTS:** The company shows evidence on developing fortified products that help address deficiencies among specific populations. The company is encouraged to harness this effort by making a commitment to address the specific needs of people experiencing, or at high risk of, any form of malnutrition (priority populations) through healthy and appropriate products. ATNI advises that Coca-Cola adopts a fortification policy and commits to only fortify products of high underlying nutritional quality or meeting relevant nutrition criteria. In addition, the company is encouraged to link its 'women's empowerment' non-commercial activities with nutrition outcomes.
- **PRODUCTS:** The company has a sugar/calorie reduction strategy based on local pledges. For example, in partnership with Coca-Cola Hellenic Bottling Company, it committed to "reduce by 25 percent the calories per 100ml of sparkling soft drinks by 2025." In Australia and New Zealand, Coca-Cola has a 2025 goal to reduce the sugar in its total portfolio (measured in g per 100ml) by 20 percent,

designed by or (co)implemented with stakeholder groups with relevant expertise. For example, 'Balance Calories Canada' follows a three-step education process encouraging consumers to 1) swap for low/no-calorie drinks; 2) try a smaller portion size; and, 3) balance calories with activities.

- **LABELING:** Compared to 2018, Coca-Cola has improved its performance in category F by disclosing a commitment to follow the Codex Alimentarius guidelines for health and nutrition claims, also when fortifying products with relevant micronutrients. The company shared with ATNI relevant information from its internal 'Global Requirements for Claims & Communications.' In the public domain, it states: "in the absence of national or supranational laws, regulations or guidelines (e.g., EU, MERCOSUR, GCC), our company will follow the Codex Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)." The company is encouraged to expand this commitment even when not embedded in local regulations.

- **ENGAGEMENT:** Coca-Cola discloses a list of U.S. trade associations it belongs to that engage in lobbying, as well as the portion of the dues it pays that are used for this purpose. While companies are required by law in the U.S. to publish detailed quarterly reports on their lobbying activities, Coca-Cola is the only company found to publish their reports directly on their website. The company also provides a highly detailed breakdown of its political contributions in the U.S.

using 2015 as the baseline year. While Coca-Cola reports that its low- or no-sugar beverages account for about 45 percent of its portfolio, it has not adopted a global sugar reduction target which is time-bound, externally verifiable, and applicable to all relevant products. As in 2018, the company is still encouraged to define products' formulation or reformulation targets for 'positive ingredients/nutrients' – e.g., fruits, vegetables, nuts and legumes – particularly as it continues to expand its portfolio covering different beverage categories in major markets like juices and dairy.

- **ACCESSIBILITY:** Coca-Cola has not yet formalized commitments, measurable objectives, and targets to improve the affordability and accessibility of its healthy products for all consumers in all its markets. Although the company shared with ATNI evidence that it has conducted analysis on appropriate pricing of nutritious/fortified products for both the general consumer and priority populations, the company could consider articulating a clear definition of healthy products in its approach, ideally linked to the use of a government endorsed NPM.

- **MARKETING:** Coca-Cola shared with ATNI examples of responsible marketing arrangements in schools. For example, with the European soft drinks industry, it has committed to sell only low- and no-sugar drinks in all secondary schools. In the United States, the American Beverage Association (ABA) removed full-calorie soft drinks from primary and secondary schools. ATNI advises that the company extends these marketing to children commitments globally, covering all children under the age of 18 and places where children typically gather.

- **LIFESTYLES:** Although the company shared relevant examples of employee health and wellness programs, it has not tracked expected outcomes, nor is there evidence the programs are available to all employees globally. The company and its bottling partners are strongly encouraged to make a commitment to improve the health and wellness of groups across the food supply chain that are not direct employees (e.g., smallholder farmers, factory workers, small scale vendors) through nutrition-sensitive programs, including expected outcomes. The company could consider introducing a formal policy on employee health and wellness which includes supporting breastfeeding mothers at work.

- **LABELING:** Coca-Cola has not made a global commitment to adopt an interpretive front-of-pack (FOP) labelling system. ATNI recommends the company to continue to support governments and other stakeholders to develop interpretive FOP systems which do not undermine existing systems.

- **ENGAGEMENT:** Coca-Cola is encouraged to publicly commit to lobby responsibly; that is, with an explicit focus on supporting measures designed to improve health and nutrition, with a solid grounding in independent, peer-reviewed science. It is recommended the company conducts internal or independent audits of its lobbying activities, including by third parties, to better manage and control their lobbying. The company is advised to also improve its lobbying transparency by disclosing any potential governance conflicts of interest and Board seats at trade associations, and expand its existing disclosure to cover other markets, not just the U.S.

- **ENGAGEMENT:** The company does show some evidence of new products developed to help address

micronutrient deficiencies (e.g., Vitingo, its iron-fortified powdered drink in India), but there was no evidence it had looked for external expert advice on how it should design its strategies, policies, and programs, to prevent and address undernutrition and micronutrient deficiencies on a strategic/Board level. The company is therefore encouraged to conduct well-structured and focused engagement with a variety of independent stakeholders with expertise in nutrition and addressing malnutrition, in order to strengthen their strategies and policies and provide valuable feedback on their relevance and effectiveness.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution



Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

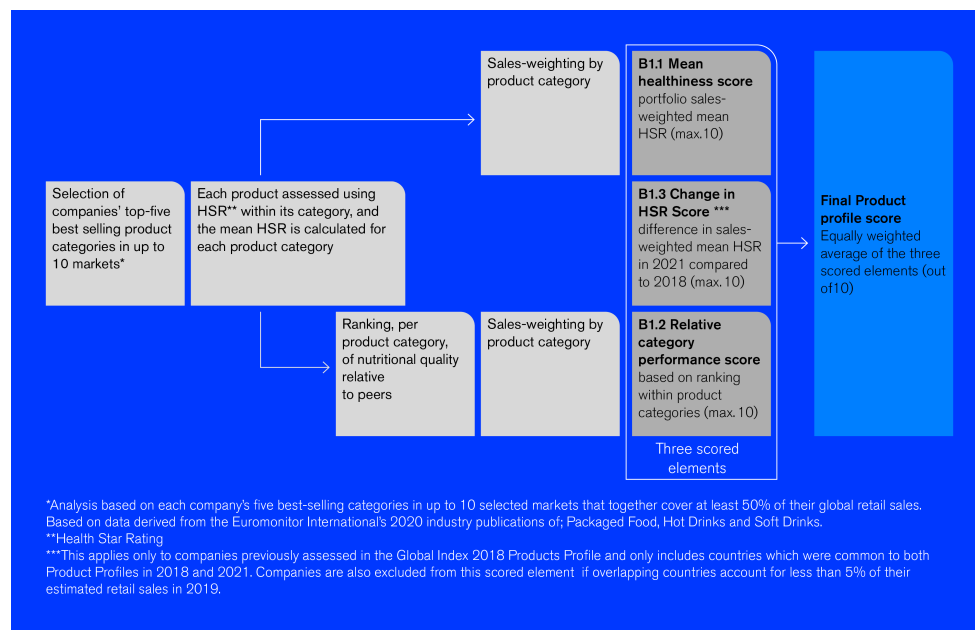


22

Rank 22 / Score 2.8

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



Coca-Cola has been assessed for the second time in the Global Index Product Profile. In the previous assessment, nine of the company's markets were selected, and a total of 1186 products analyzed – accounting for approximately 45-50% of global retail sales in 2017, excluding baby foods, plain tea, and coffee. In this Index, a total of 1278 products have been analyzed across 10 of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 50-55% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

Japan is a new country included in this iteration. In 2018, a total of 8 product categories were covered by the assessment, compared to 11 categories in 2021. For all companies, Bottled Water has been split into two categories for this iteration (Bottled Water – pure and Bottled Water – other). 'Sports Drinks and Energy Drinks' has been split into 'Sports Drinks' and 'Energy Drinks'. Products from the 'Asian Specialty Drinks' and 'RTD Coffee' are assessed in 2021 but were not in 2018, whereas products from the 'Processed Fruit and Vegetables' category were assessed in 2018, but are not in 2021.

In this Product Profile assessment, Coca-Cola scores 3.6 out of 10 (B1.1) in the mean healthiness element, 4.9 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers, and 0 out of 10 (B1.3) for changes in nutritional quality (mean HSR) over time. This results in Coca-Cola obtaining an overall score of 2.8 out of 10 and ranking 22 out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	10 Countries included	Range of global sales included ①	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNScored		
			No. products assessed	% products healthy (≥3.5 stars)	% retail sales healthy 2019 (≥3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥3.5 stars) ②	No. products assessed	% products suitable	% sales from suitable
1.8	Australia, China, Hong Kong, India, Japan, Mexico, New Zealand, South Africa, UK, USA	50-55%	1278	23%	10%	11%	1346	8%	10%

▪ A total of 1278 products manufactured by Coca-Cola, sold in 10 countries, covering 11 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 1.8 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 3.6 out of 10 for Coca-Cola. The company ranks 19 out of 25 companies in this first scored element (B1.1).

▪ Overall, 23% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥3.5). Together, these products accounted for an estimated 10% of Coca-Cola's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 11% of its global retail sales from healthy products in 2019.

WHO nutrient profiling models (unscored): Only 8% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 10% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR >= 3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) i
Energy Drinks	1	0%	1.0	1.1	3rd out of 3
RTD Coffee	13	0%	1.3	2.7	6th out of 6
Asian Speciality Drinks	2	0%	1.5	N/A	N/A
Carbonates	458	1%	1.5	1.6	4th out of 5
Concentrates	3	0%	1.5	1.2	1st out of 7
Sport Drinks	101	2%	1.7	1.8	2nd out of 3
RTD Tea	32	0%	1.8	1.7	2nd out of 7
Bottled Water-other	74	5%	2.1	2.1	1st out of 6
Juice	450	38%	2.7	3.2	6th out of 8
Dairy	104	74%	3.6	2.9	1st out of 18
Bottled Water-pure	40	100%	5	5	1

- The 'Bottled Water- Pure' category receives a standard rating of five stars, according to the HSR algorithm for all companies. For Coca-Cola, 'Dairy' was the next best performing category, where a total of 104 products analyzed obtained mean HSR of 3.6 out of 5. Energy drinks (1.0) had the lowest mean HSR of all product categories included for Coca-Cola.

- For five out of the eleven categories assessed, Coca-Cola products perform equal to or better than the mean HSR of companies selling products in the same categories. The 'Asian Specialty Drinks' category is not compared to a mean HSR for all companies, as Coca-Cola is the only company for which this category is assessed.

- Coca-Cola scores 4.9 out of 10 in this second scored element (B1.2) and ranks 18 out of 25 companies. This is based on its ranking compared to peers within the 11 categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
Australia	158	56	1.7	2.1
China	66	68	2.1	1.8
Hong Kong	58	48	1.8	2.3
India	32	48	1.9	1.6
Mexico	139	321	1.9	1.6
New Zealand	152	81	1.9	2
South Africa	82	72	1.4	1.9
UK	148	285	2.2	2.2
USA	351	281	1.7	1.7
TOTAL	1186	1233	1.8	1.8

- Coca-Cola showed no increase in mean HSR between the 2018 and 2021 Product Profiles (mean HSR=1.8 to 1.8). The change in HSR score only takes into account the nine countries included in both 2018 and 2021 assessments.

- Adjusting scores by country sales weighted estimates (which gives more weight to company's largest markets), Coca-Cola achieves an increase of zero in mean HSR between 2018 and 2021, resulting in a score of zero out of 10 on this element using the scoring system set out in ATNI's methodology.

Full Product Profile report:

https://acesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

Conagra

Product categories assessed

Breakfast Cereals|Edible Oils|Other Hot Drinks|Processed Fruit and Vegetables|Ready Meals|Sauces, Dressings, Condiments|Sweet Spreads|Savory Snacks

Percentage of company global sales covered by Product Profile assessment
75-80%

Headquarters
U.S.

Number of employees
18000

Type of ownership
Public



Product Profile ⓘ

Rank 17 / Score 2.3

Rank 8 / Score 5.7

Rank 16 (2018)

Rank 5 (2018) ⓘ

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 17

Score 2.3

Commitment

Performance

Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS:** The company's score has increased from 1.4 in 2018 to 2.3 in 2021. The company's ranking, however, has fallen by one, to 18th place. The most significant increase is observed in Category F.
- **GOVERNANCE:** As part of its 'Good Food' nutrition strategy, the company commits to "deliver foods with nutritional benefits that are aligned with consumer preferences [...] using whole foods and intentional ingredients." The company seeks to address various forms of malnutrition through a focus on portion control, "dietary variety", and "heart health". Conagra's commitment is reflected in the strategic value placed on the 'Healthy Choice' line of products. Since 2018, the company has published the accountability arrangement for its nutrition strategy, with its CEO and senior leadership team being responsible for the 'Good Food' pillar, which involves "affordable and nutritious foods". It also states its nutrition strategy is subject to review by the Nominating, Governance and Public Affairs Committee of its Board.
- **PRODUCTS:** While Conagra has not adopted a NPM to guide its product reformulation and product development activities, the company scores relatively strongly in the Product Profile ranking 8th. Among companies with mixed product portfolios, ConAgra leads in the mean healthiness score (6.2 out of 10 or Health star rating (HSR) of 3.1 out of 5)- an indication of the nutritional quality of company's products in best-selling categories across major markets. Conagra's increase observed in mean HSR between 2018 and 2021 when examining the same countries included in both Global Index Product Profile reports (mean HSR=2.9 to 3.1) is partly explained by the increase in the proportion of sales from 'Processed Fruit and Vegetables.'
- **MARKETING:** Conagra participates in the Children's Food and Beverage Advertising Initiative (CFBAI), so it neither advertises products to children aged two to six, nor in primary or secondary schools, and only markets products that meet the CFBAI's nutrition criteria for children aged seven to 12. The company sets a 35 percent threshold for programs or media that have a child audience, and has several tools in place to ensure its digital marketing does not reach younger audiences – such as reviewing age-related data and assessing the nature of third-party websites chosen to advertise on.
- **LIFESTYLES:** Through the Conagra Brands Foundation, the company delivers nutrition education, cooking skills, and healthy and active lifestyle programs in the U.S. These are in partnership with local and national non-profits, who design the programs themselves and are co-implemented together, with the NGOs having strong leadership in the process.
- **ENGAGEMENT:** The company discloses its membership of nine trade associations, and the portion of their 2020 dues that were allocated to non-deductible lobbying expenses, on its website; as well as the contributions by the Conagra Brands Employee PAC and a link to its LDA reports. It states it does not spend on independent public campaigns for/against candidates during elections. The company assigns oversight of its political activities to the

Priority areas for improvement

- **GOVERNANCE:** While the company has a commercial strategy involving a focus on nutrition for the general consumer, limited evidence was found of the company seeking to address the needs of priority populations at risk of malnutrition as defined by relevant health and/or social care authorities. Conagra is encouraged to engage in market research to assess unmet needs of priority populations in the markets where it is active, and conduct a strategic review of the commercial opportunities in addressing them.
- **PRODUCTS:** The company has not set any targets for reducing levels of sodium, saturated fat, and added sugar/calories, or to increase positive ingredients like fruits, vegetables, nuts, and legumes (FVNL), and whole grains. The company is encouraged to set SMART targets that cover all relevant product categories and for nutrients of concern relevant to their product portfolio. As in 2018, Conagra does not make use of a Nutrient Profiling Model (NPM). It therefore lacks an effective health-oriented framework to guide its product reformulation and research and development (R&D), or to determine product eligibility for fortification, marketing to children, or an access or affordability strategy. The company is advised to adopt an NPM, one which is preferably government-endorsed.
- **ACCESSIBILITY:** The company does not show evidence of any commitment or commercial strategy to improve the affordability and accessibility of its healthy products (i.e., 'Nutrition-Forward Foods'), beyond participation in federal subsidy programs such as the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). The company is encouraged to make company-wide public commitments on addressing the affordability of its healthy products (according to objective nutrition criteria), and develop concrete strategies with measurable targets to reach consumers, especially those with low-income and limited access across all markets the company is active in, and not only in the U.S.
- **MARKETING:** As in 2018, Conagra's Code of Conduct includes commitments to responsible marketing to all consumers, but does not fully encompass the International Chamber of Commerce (ICC) Code of Advertising and Marketing Communication Practice, nor does it specify which media are covered. The company is also advised to upgrade its policy to include explicit commitments regarding: responsible marketing techniques aimed at children; the responsible deployment of children, celebrities (including influencers), or fantasy and animated characters; and the responsible use of promotional toys, games, vouchers, and competitions.
- **LABELING:** Conagra participates in the 'Facts Up Front' initiative in the U.S., and provides levels of calories, sodium, saturated fat, and sugars per serving on the front of its food packages. However, these commitments are limited to its home market. As such, the company is encouraged to adopt a global policy which commits to provide full nutrition labelling, in an interpretative front-of-pack (FOP) format, on all products globally. To strengthen its performance, the company is encouraged to publicly disclose a policy in which it commits only to placing a

Board and has a whistleblowing mechanism that covers the company's Code of Conduct.

health or nutrition claim on a product when it complies with relevant Codex standards for countries where no national regulatory system exists, or when standards are weaker than those of Codex.

- **ENGAGEMENT:** Conagra could consider improving its transparency around its commitments and activities relating to lobbying and influencing governments and policymakers on nutrition issues. To strengthen its approach, the company is recommended to commit to lobbying only in support of public health initiatives, in all markets, and more actively disclose its lobbying positions on nutrition-related topics and its lobbying efforts to address malnutrition.

- **ENGAGEMENT:** The company did not provide evidence of engaging with stakeholders in developing its nutrition strategy, policies and/or programs, or of partnerships with any international initiatives/organizations to address malnutrition in priority populations. Conagra is encouraged to conduct well-structured and focused engagement with a variety of independent stakeholders that have expertise in nutrition and addressing malnutrition, in order to strengthen their strategies and policies.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

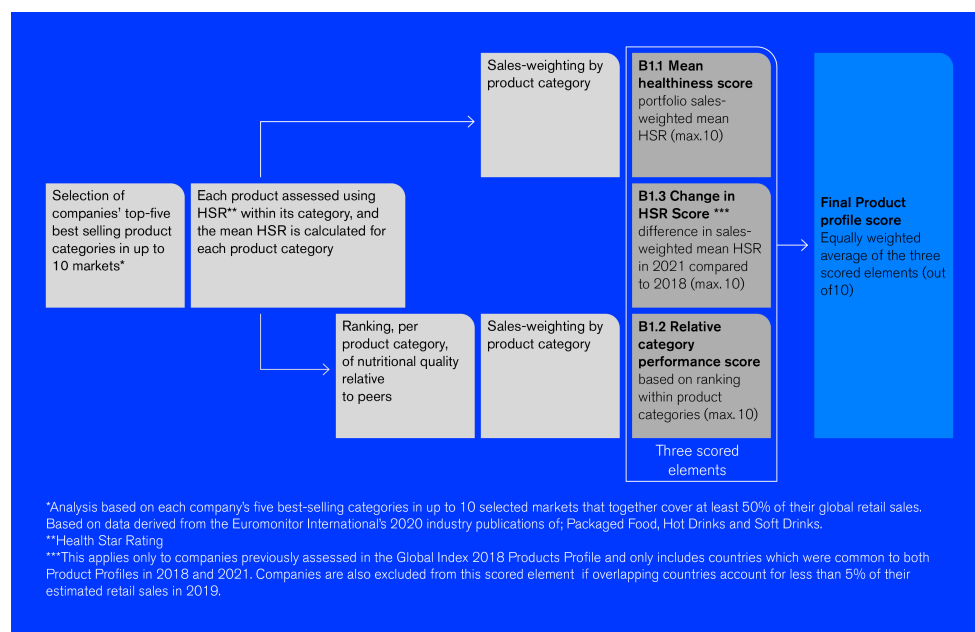


8

Rank 8 / Score 5.7

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



ConAgra has been assessed for the second time in the Global Index Product Profile. In the previous assessment, five of the company's markets were selected, and a total of 1036 products analyzed – accounting for approximately 75-80% of global retail sales in 2017, excluding baby foods, plain tea, and coffee. In this Index, a total of 1891 products have been analyzed across four of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 75-80% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

Hong Kong is a new country included in this iteration. New Zealand and South Africa were included in the 2018 but have been omitted this time. In both 2018 and 2021, a total of 9 product categories were covered by the assessment. Products from the 'Other Hot Drinks' category are assessed in 2021 but were not in 2018, whereas products from the 'Dairy' category were assessed in 2018 but are not in 2021. Instead of the 'Spread' category, which was assessed in 2018, the 'Sweet Spreads' category is assessed in 2021.

In this Product Profile assessment, ConAgra scores 6.2 out of 10 (B1.1) in the mean healthiness element, 6.8 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers, and 4 out of 10 (B1.3) for changes in nutritional quality (mean HSR) over time. This results in ConAgra obtaining an overall score of 5.7 out of 10, ranking eight out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	5 Countries included	Range of global sales included ①	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥ 3.5 stars)	% retail sales healthy 2019 (≥ 3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥ 3.5 stars) ①	No. products assessed	% products suitable	% sales from suitable
3.1	Hong Kong, India, Mexico, New Zealand, USA	75-80%	1891	57%	47%	60%	2021	2%	4%

- A total of 1891 products manufactured by ConAgra, sold in five countries, covering 9 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 3.1 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 6.2 out of 10 for ConAgra. The company ranks 4 out of 25 companies in this first scored element (B1.1).

WHO nutrient profiling models (unscored): Only 2% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 4% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

- Overall, 57% of distinct products assessed were found to meet the HSR healthy threshold ($HSR \geq 3.5$). Together, these products accounted for an estimated 47% of ConAgra's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 60% of its global retail sales from healthy products in 2019.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR >= 3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) 1
Other Hot Drinks	2	0%	0.5	1.4	5th out of 5
Processed Meat and Seafood	159	40%	2.5	3.1	5th out of 8
Breakfast Cereals	12	67%	3.7	3.5	3rd out of 6
Edible Oils	22	91%	4.3	N/A	N/A
Processed Fruits and Vegetables	225	87%	4	4.1	3rd out of 4
Ready Meals	859	68%	3.3	3	2nd out of 9
Sauces, Dressings and Condiments	198	38%	2.6	2.5	5th out of 11
Savoury Snacks	401	32%	2.5	2.2	3rd out of 8
Sweet Spreads	13	100%	4.2	2.2	1st out of 5

▪ For ConAgra 'Edible Oils,' was the best performing category, where a total of 22 products analyzed obtained mean HSR of 4.3 out of 5. 'Other Hot Drinks' (0.5) had the lowest mean HSR of all product categories included for ConAgra.

▪ For five out of the nine categories assessed, ConAgra's products perform better than the mean HSR of companies selling products in the same categories. The company performs best compared to peers in the 'Sweet Spreads' category.

▪ ConAgra scores 6.8 out of 10 in this second scored element (B1.2) and ranks 10 out of 25 companies. This is based on its ranking compared to peers within the 16 categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
India	30	90	3.5	3.9
Mexico	43	106	3.6	3.7
New Zealand	6	15	2.3	2.4
USA	949	1678	2.9	3.1
TOTAL	1028	1889	2.9	3.1

- ConAgra showed a slight increase in mean HSR between the 2018 and 2021 Product Profiles (mean HSR=2.9 to 3.1). The change in HSR score only takes into account the five countries included in both 2018 and 2021 assessments. For ConAgra, it is difficult to attribute the change in HSR score to specific category-level changes, although it appears the replacement of the 'Dairy' category (HSR=2.1) for the USA with 'Sauces, Dressings and Condiments' (HSR=2.5) in 2021 was partly responsible for the change. Additionally, an increase in the proportion of sales from 'Processed Fruit and Vegetables', and a change in the mean HSR for 'Savoury Snacks' in the USA between 2018 (HSR=2.1) and 2021 (HSR=2.4) may also have contributed to the overall change.

- Adjusting scores by country sales weighted estimates (which gives more weight to company's largest markets), ConAgra achieves an increase of 0.2 in mean HSR between 2018 and 2021, resulting in a score of 4 out of 10 on this element using the scoring system set out in ATNI's methodology.

Full Product Profile report:

https://acesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

Danone

Product categories assessed

Bottled Water (other)| Bottled Water (Pure)|Dairy|RTD Coffee|

Percentage of company global sales covered by Product Profile assessment

55-60%

Headquarters

France

Number of employees

100000

Type of ownership

Public



Product Profile ⓘ

Rank 4 / Score 5.8

Rank 3 (2018)



BMS/CF Marketing ⓘ

Rank 1 / Score 8.2

Rank 2 (2018) ⓘ

Rank 1 / Score 68%

Rank 1 (2018)

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 4

Score 5.8

Commitment

Performance

Disclosure

An adjustment of -0.48 to the company's score has been made based on its score in the BMS/CF Marketing Index 2021.

Company BMS/CF Scorecard:

https://acesstonutrition.org/app/uploads/2021/06/ATNI_Scorecard_Danone.pdf

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS** Although Danone's score slightly dropped from 6.3 in 2018 to 5.8 in 2021, Danone ranks 4th in the 2021 Global Index. The company also ranks 1st on the Product Profile and achieved the highest mean healthiness score (6.9 out of 10)- an indication of the nutritional quality of company's products in best-selling categories across major markets. It was the only company to achieve the healthy threshold of 3.5 HSR at the portfolio-level when results were sales-weighted.
- **GOVERNANCE:** Danone continues to demonstrate clear commitments to contributing positively to diets and health. Concerning priority populations at risk of malnutrition, Danone continues to use NutriPlanet, a comprehensive analysis of local nutrition and health contexts based on a review of scientific literature, enhanced by interviews with local experts and key opinion leaders. The company acquires data from national dietary surveys mainly carried out by government and research institutes in countries where they exist, or from their own surveys where information is lacking. In this endeavor, a partnership was signed in 2019 between Danone and the Food and Agriculture Organization (FAO) that includes sharing such data, starting with Egypt as a pilot country. The company utilized this data to understand what people eat and drink and compare intakes to dietary and nutrient recommendations, in order to improve the products to better serve the priority population with micronutrient deficiencies.
- **GOVERNANCE:** The company started a new phase of the 'Danone Way' program to advance and measure their sustainability performance, including a strategic focus on improving nutrition and health at the Local, Regional and Global level (and get more Danone entities B-Corp certified). In its efforts to address undernutrition, Danone employs NutriPack, a market research assessment, to identify nutritional needs among the population based on epidemiological literature review and expert interviews. In addition, the company intends to improve the portfolio of healthy products through the 'Manifesto brand' framework.
- **PRODUCTS:** With an improved strategy – 'Nutritional Targets 2020' – to develop healthier products, and updated nutrient profiling model which considers 'positive' and 'negative' nutrients, Danone has a clear definition of 'healthy categories', which are benchmarked against the health star rating (HSR) model; and is one of the few companies found to do so. In addition, the company has publicly disclosed the externally-verified level of achievements with its nutrient targets. The company is commended for publicly disclosing its 'Policy on micronutrient fortification', in which it makes the public commitment to only fortifying products belonging to company's 'healthy categories' (as listed in 'Danone Nutritional Targets').
- **ACCESSIBILITY:** Danone's public commitment states that accessible and affordable nutrition is a fundamental component of its business strategy, and that it focuses on providing healthy, affordable products to vulnerable groups with targeted distribution models. For instance, they sell Shokti+ yogurt – designed to deliver 30 percent of the daily requirement for iron, zinc, vitamin A and iodine – at

Priority areas for improvement

- **GOVERNANCE:** Although the company has made fundamental efforts in addressing micronutrient deficiencies, the company could consider putting more emphasis on other forms of malnutrition, such as undernutrition, obesity, and diet-related chronic diseases.
- **PRODUCTS:** Danone is encouraged to improve its nutritional targets by setting time-bound and externally verifiable sodium/salt, fruits, vegetables, nuts, legumes (FVNL), and whole grain targets for all relevant product categories. The company could also consider implementing consumer portion control strategies and undertake research to demonstrate the efficacy of this on consumer behavior. In addition, Danone is encouraged to demonstrate how products marketed to children correspond with regional World Health Organization (WHO) criteria for marketing to children.
- **ACCESSIBILITY:** Danone is advised to strengthen its commitments to improving the affordability and accessibility of its healthy products by explicitly referring to low-income consumers and those with limited geographical access, and extend it to products aimed at addressing micronutrient deficiencies in priority populations, in all markets it is active in. The company is encouraged to set concrete, measurable targets on pricing and distribution of its healthy products through a commercial approach, with tailored approaches for priority populations in all its markets.
- **MARKETING:** To improve its marketing policy, Danone is encouraged to develop market strategies to reach priority populations. In addition, the company could consider committing to not advertise to children at all, no matter whether the products meet the company's standard. Moreover, the company could also increase the age range for restrictions in advertising to 18 years, and adopt tools to ensure its digital marketing does not reach younger age groups.
- **LIFESTYLES:** To complement Danone's employee health and wellness program, the company is advised to offer nutrition and physical activity programs on top of the existing healthcare coverage. ATNI also encourages the company to support the health and wellness of groups across the food supply chain that are not direct employees, extend the program to family members, and publish details.
- **LIFESTYLES:** Danone runs and funds various consumer-oriented education programs, but not all of them are independently designed and implemented programs that exclude product or brand-level branding.
- **LABELING:** Although Danone has strong labeling commitments, the company falters in this area due the scope of its commitments regarding the use of health and nutrition claims. To prevent misuse of claims, or the placement of claims on unhealthy products, it is recommended that Danone commits to not using claims on products unless they have been pre-determined as healthy by a relevant (and preferably government-endorsed) NPS. This is recommended to be applied to all products and markets that the company is active in.

an affordable price through a dense distribution system serving both urban and rural populations in Bangladesh. Danone has implemented micro-distribution projects in nine countries, with the potential to empower vulnerable populations, mainly women from underprivileged areas, and drive local development, while expanding access to healthy foods and beverages.

- **MARKETING:** Besides pledging adherence to the International Chamber of Commerce (ICC) Advertising and Marketing Communications Code, the company has a strict marketing to children policy of “no product marketing communications in and near Primary schools nor in Secondary schools.” Regarding digital marketing in schools, the company has a clear definition of marketing communications that covers new media of online/digital forms. Furthermore, Danone’s compliance regarding children and teens marketing is audited through both its own process, ‘Danone Way’ (which in turn is audited by PwC), and the numerous local and regional pledges it has joined.

- **LIFESTYLES:** With the intention to encourage the physical activity and healthy dietary choices of its staff, the company organized a ‘Get healthy’ challenge in its headquarters to encourage employees to drink more, recycle more, and do more physical exercise. To support breastfeeding, the company provides lactating mothers with access to exclusive lactation facilities to either breastfeed (where possible) or express breastmilk during working hours (with dedicated breaks) in a safe, private, hygienic, and adapted environment, or reasonable time-off during the day to either breastfeed or express milk. The installation of lactation rooms can be requested by any female employee, even on sites with less than 50 female employees.

- **LABELING:** With regards to product labeling and use of health and nutrition claims, the company’s ranking increased from 2018 to 2021. This change is not only attributed to the adaptation of Danone’s Nutrition Commitments, which include comprehensive commitments to product labeling, but also the disclosure of the introduction of its labeling policy in ‘Danone Nutritional Achievements’. Furthermore, Danone has introduced a front-of-pack (FOP) interpretative labeling system, instead of solely a numeric format display as found in 2018 Global Index, and is one of the only three companies that has committed to do so for all products, globally. This is industry best practice. Interpretative labeling displays nutritional information in a clear and easy to read format, which can help consumers make informed and healthier choices.

- **LABELING:** Danone has developed a labeling strategy to reduce food waste. In France, the company participates in the French Pact on date labeling (the ‘Too Good to Go’ initiative), while, in Germany, its Activia brand has switched to ‘best before, often good after’. Additionally, Danone pledged to reduce its unrecovered food waste (i.e., waste sent in landfill, incinerated without energy recovery, or discharged in wastewater) by 50 percent by 2025.

- **ENGAGEMENT:** Danone received the highest score for its efforts in engaging with and influencing governments. These include company-wide commitments to lobby in support of measures to improve health and nutrition, reflected in its robust lobbying management systems and above-average lobbying disclosure. The company supports

- **ENGAGEMENT:** The company is encouraged to build on its partnership approach (such as with FAO) to publicly engage with more stakeholders to combat malnutrition (obesity, undernutrition, micronutrient deficiencies, and related diseases) by supporting international initiatives and soliciting input on its commercial strategies.

- **BREAST-MILK SUBSTITUTES AND COMPLEMENTARY FOODS:** Although Danone applies its BMS marketing policy to infant formula in all markets (both in higher- and lower- risk countries), ATNI urges Danone to apply this policy globally in relation to all products covered by The Code, including growing-up milks and formulas for special medical purposes which are BMS products not yet covered by Danone’s policy. Being a manufacturer of complementary foods (CF) marketed to children 6-36 months of age, Danone is also urged to develop policy commitments and associated management systems in relation to CF marketing in alignment with the recommendations set out in the guidance related to WHA resolution 69.9.

governments' efforts to address malnutrition on a global basis, and is commended for engaging with a range of international stakeholders (such as the FAO), in a well-structured and focused manner in the development of its nutrition strategies and programs. As of 2019, the company also has over 100 panels of local experts advising its nation-level subsidiaries on their commercial nutrition strategies across its markets.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution



Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

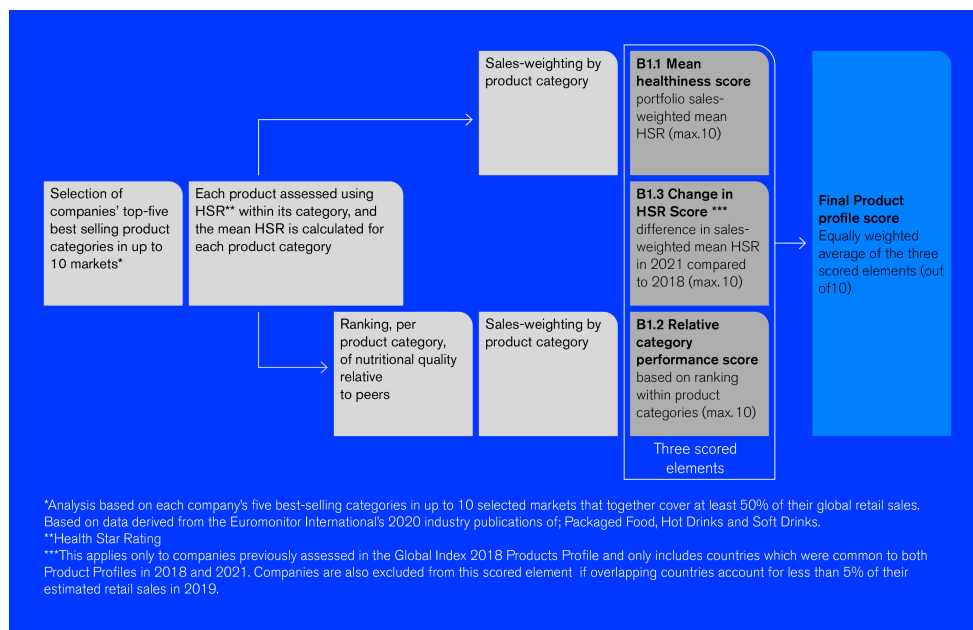


1

Rank 1 / Score 8.2

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



Danone has been assessed for the second time in the Global Index Product Profile. In the previous assessment, seven of the company's markets were selected, and a total of 759 products analyzed – accounting for approximately 25-30% of global retail sales in 2017, excluding baby foods, plain tea, and coffee. In this Index, a total of 1626 products have been analyzed across 10 of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 55-60% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

Brazil, France and Russia are new countries included in this iteration. In 2018, a total of four product categories were covered by the assessment, compared to five categories in 2021. For all companies, Bottled Water has been split into two categories for this iteration (Bottled Water – pure and Bottled Water – other). Products from the 'RTD Coffee' category are assessed in 2021 but were not in 2018, whereas products from the 'Ice cream and Frozen Desserts' category were assessed in 2018, but are not in 2021.

In this Product Profile assessment, Danone scores 6.9 out of 10 (B1.1) in the mean healthiness element, 9.6 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers, and 8 out of 10 (B1.3) for changes in nutritional quality (mean HSR) over time. This results in Danone obtaining an overall score of 8.2 out of 10, ranking first out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	10 Countries included	Range of global sales included ①	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥3.5 stars)	% retail sales healthy 2019 (≥3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥3.5 stars) ①	No. products assessed	% products suitable	% sales from suitable
3.5	Australia, Brazil, China, France, Hong Kong, Mexico, Russia, South Africa, UK, USA	55-60%	1626	61%	61%	65%	1642	18%	25%

- A total of 1626 products manufactured by Danone, sold in 10 countries, covering five product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 3.5 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 6.9 out of 10 for Danone. The company ranks first out of 25 companies in this first scored element (B1.1).

WHO nutrient profiling models (unscored): Only 18% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 25% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

- Overall, 61% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥3.5). Together, these products accounted for an estimated 61% of Danone's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 65% of its global retail sales from healthy products in 2019.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR >= 3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) 1
Bottled Water - other	108	3%	2.1	2	1st out of 6
Dairy	1470	94%	3.5	2.9	2nd out of 18
RTD Coffee	23	22%	3.9	2.7	2nd out of 6
Bottled Water - pure	25	100%	5	5	1st out of 7

▪ The 'Bottled Water- Pure' category receives a standard rating of five stars, according to the HSR algorithm for all companies. For Danone, 'RTD Coffee' was the next best performing category, where a total of 23 products analyzed obtained mean HSR of 3.9 out of 5. 'Bottled Water – Other' (2.1) had the lowest mean HSR of all product categories included for Danone.

▪ For four out of the four categories assessed, Danone's products perform equal to or better than the mean HSR of companies selling products in the same categories. The company performs best compared to peers in the following product categories; 'RTD Coffee' and 'Dairy'.

▪ Danone scores 9.6 out of 10 in this second scored element (B1.2) and ranks 1 out of 25 companies. This is based on its ranking compared to peers within the four categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
Australia	47	49	2.3	3.4
China	27	34	2.4	2.7
Hong Kong	3	2	5	5
Mexico	113	222	2.3	3
South Africa	65	76	3.1	3.3
UK	113	177	3.3	4
USA	391	444	3.8	3.7
TOTAL	759	1004	3.1	3.5

- Danone showed an increase in mean HSR between the 2018 and 2021 Product Profiles (mean HSR=3.1 to 3.5). The change in HSR score only takes into account the seven countries included in both 2018 and 2021 assessment. For Danone, increase observed in mean HSR between 2018 and 2021 may be attributed to an increase in healthiness and proportion of sales from the 'Dairy' category, and a decrease in 'Bottled-water' sales (this includes 'Bottled water – other' category, which has a larger proportion of sales and a much lower HSR).
- Adjusting scores by country sales weighted estimates (which gives more weight to company's largest markets), Danone achieves an increase of 0.4 in mean HSR between 2018 and 2021, resulting in a score of 8 out of 10 on this element using the scoring system set out in ATNI's methodology.

Full Product Profile report:

https://accesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

Breast-milk Substitutes / Complementary Food Marketing



1

Rank 1 / Score 68%

Rank	BMS Marketing	Adjustment to Global Index Score ¹	BMS 1	BMS 2	Level of compliance in country studies	
		Max. of -1.5			Philippines	Mexico
1	68%	-0.48	53%	83%	Complete (100%)	High (66%)

- Danone is one of the six Index companies included in the BMS/CF Marketing Index. Its score is based on two assessments: BMS/CF 1 which assessed the company's policy commitments, management systems and disclosure relating to the marketing of its BMS and CF 6-36 products, and BMS/CF 2 which assessed its marketing practices in Mexico and the Philippines during 2020. The BMS/CF Marketing Index score is used to generate a proportionate adjustment to the final Global Index score.

- Danone ranks first again in the BMS/CF Marketing Index with a level of compliance with ATNI's updated methodology (including WHA 69.9 and a CF module) of 68%.

- Although Danone's BMS marketing policy is substantially aligned with The Code, gaps remain particularly in regulating marketing within the healthcare system. Danone's policy does not incorporate commitments to reflect all WHA resolutions including WHA 69.9 which is why it scores lower on policy commitments in the BMS module. The related management systems essentially remained the same with some procedures missing while others were developed in other areas. Danone also scores lower on disclosure compared to 2018 due in part to disclosing less and in part due to not having policy commitments to be able to disclose relating to WHA 69.9. However, among the companies assessed on the CF module, Danone scores the highest in this section with a score of 10% due to having some commitments related to Recommendation 3 of WHA 69.9 on CF product formulation following internationally established standards. Danone's BMS marketing policy applies to infant formula across all markets but only applies to follow-on formula in higher-risk countries. Thus, its overall score on BMS/CF 1 is 53%.

- To improve its score, Danone should ensure that its BMS marketing policy applies in all markets and extends to all products covered by The Code including growing-up milks and all formulas for special medical purposes. It should also revise its policy and procedures to ensure it encompasses all of the recommendations of the WHA resolutions including WHA 69.9 and incorporate commitments in relation to the marketing of its CF 6-36 products. Danone should ensure that all relevant documents are readily disclosed in the public domain.

- Danone's score is largely attributed to its aggregate score from the two in-country studies of marketing practices, as it improved since 2018 to a score of 83%, being rated as having a complete level of compliance with The Code in the Philippines and a high level of compliance in Mexico. To bring its marketing practices into line with The Code, it is important that Danone extends its policy to growing-up milks and should ensure the inclusion of all WHA resolutions including WHA 69.9.

BMS/CF Chapter Global Index 2021:

<https://accesstonutrition.org/index/global-index-2021/bms-chapter-global-index-2021/>

Ferrero

Product categories assessed

Baked Goods|Confectionery|Dairy|RTD
Tea|Sweet Spreads|Sweet Biscuits, Snack
Bars and Fruit Snacks

Percentage of company global sales covered by Product Profile assessment
55-60%

Headquarters
Italy

Number of employees
36,372

Type of ownership
Private



Product Profile ⓘ

Rank 16 / Score 2.9

Rank 10 / Score 5.4

Rank 12 (2018)

Rank 21 (2018) ⓘ

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 16

Score 2.9

Commitment

Performance

Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS:** While the company's overall score has decreased, Ferrero has shown improvement since 2018 in four of the seven thematic areas of the Index, with most increase in Categories E 'Lifestyles' and G 'Engagement'.
- **GOVERNANCE:** Ferrero mentions in its 'core values' a focus on delivering products of nutritional value and appropriate portions so that they can be integrated into a balanced diet. In its approach, the company acknowledges the challenges posed by obesity and diet-related diseases, and promotes responsible consumption of its products.
- **PRODUCTS:** In its 'Statement on Product Formulation and Innovation' from October 2019, Ferrero indicates it has "stopped using partially hydrogenated fats in its products since 2006 and confirmed the adoption of manufacturing processes which avoid the use of partially hydrogenated fats." The company showed evidence of recent research undertaken to demonstrate the efficacy of its portion control efforts on consumer behavior. It claims that 68 percent of Ferrero products contain less than 100 kcal per portion, and more than 85 percent of its product volumes are offered in below 40 gram portions.
- **MARKETING:** Ferrero adheres to the principles adopted by the International Chamber of Commerce (ICC) 'Framework for Responsible Food and Beverage communication', is a member of the International Food and Beverage Association (IFBA), and a signatory of the EU Pledge initiative on responsible marketing to children. The company commits to using responsible marketing techniques aimed at children, and utilizes tools to ensure its digital marketing does not reach children below the age of 12 on company-owned digital media. Through audits undertaken by the IFBA, Ferrero assesses compliance with its marketing policy towards children.
- **LIFESTYLES:** Ferrero has an employee health and wellness program, 'Casa Ferrero', for all employees and their family members. This incorporates elements of nutrition and physical activity, and offers an on-site gym and access to a nutritionist and physiotherapist. Since 2018, the company has committed to support breastfeeding mothers in its facilities and adopted a parental leave policy to allow parents to take 14 weeks of paid parental leave (in line with the International Labour Organisation's (ILO) recommendation). Ferrero also has measures in place to support breastfeeding mothers in its offices, such as offering private rooms and breaks for expressing breastmilk. The company has improved its programs for supporting consumers' healthy lifestyles by demonstrating that some exclude product level branding – such as 'The Joy of Moving' program which focuses on children's physical fitness, motor coordination, cognitive functions, and life skills, and was designed by independent experts from organizations including Rome University and the Italian Olympic Committee (CONI).
- **LABELING:** Ferrero maintains its earlier commitment to display nutrition information on the back-of-pack (BOP) and front-of-pack (FOP) for its products. It commits to providing information on the amounts of energy and nutrients per 100g of product, and provides information on

Priority areas for improvement

- **SCORES AND RANKS:** Since 2018, Ferrero's score has slightly decreased from 3.2 to 2.9 in the 2021 Global Index, resulting its rank to drop from the 12th to 16th place.
- **GOVERNANCE:** Although Ferrero commits to the nutrition-specific SDG goals, and conducts nutrition-related business risk assessments, it does not show an initiative to identify priority populations at risk of malnutrition according to relevant health and/or social care authorities. The company is encouraged to undertake strategic reviews of the commercial opportunities available to address the needs of priority populations in all markets it is active in, and further develop its commercial nutrition strategies to address all forms of malnutrition. It is recommended that Ferrero improves its quality of nutrition-related reporting by demonstrating performance against all nutrition objectives and targets, by providing information about the impact of its efforts and obtaining independent verification.
- **PRODUCTS:** While Ferrero makes global commitments to continuously improve its products through innovation and research, it does not demonstrate using a Nutrient Profiling Model (NPM) to guide its product development and reformulation efforts. Although options to increase the healthiness of confectionery products might be limited, Ferrero could consider improving the nutrition value of its portfolio by: setting relevant targets to acquire or develop new healthier product lines; reformulating its products, e.g. decreasing levels of sugar in relevant products; and adopting and publishing an NPM to guide such efforts.
- **ACCESSIBILITY:** Ferrero does not show any commitments, strategies, or actions relating to the affordability or accessibility of its healthy products. Although the company primarily develops confectionery products, which generally are not considered healthy by independent and well-verified NPMs, it does produce products in other categories, such as baked goods, sweet spreads, sweet biscuits, snack bars, and fruit snacks. ATNI recommends that Ferrero ensures its products meet healthy nutrition criteria, and are appropriately priced and distributed to promote the purchase of healthier products in all markets in which it is active.
- **MARKETING:** To improve its responsible marketing approach, Ferrero is advised to develop and deliver marketing strategies appropriate to reaching priority populations in all markets it is active in. The company could consider strengthening its responsible marketing policy for children by committing to not advertise any products to children (up to 18 years), and restrict its advertising on measured media by decreasing the child in audience threshold from 35 percent to less than 25 percent. Furthermore, to check compliance with its responsible marketing policy for all consumers, it is recommended the company commissions independent external audits (only, or in addition to, industry association-appointed third-party auditors).
- **LIFESTYLES:** Ferrero could consider committing to improve the health and wellness of groups across the food supply chain that are not its direct employees (e.g., factory workers and small scale vendors) through nutrition-

the recommended serving size alongside it. The company has also formulated a labeling strategy called the '5Rs Strategy' (remove, reduce, reuse, recycle, renew), aimed at reducing food waste.

- **ENGAGEMENT:** In an improvement since 2018, Ferrero has provided an example of supporting the Indian government's efforts to combat malnutrition. Through the Michele Ferrero Entrepreneurial Project, the company developed eight new 'Anganwadis' (rural childcare centers) for communities in the Baramati area, as part of the government's program to combat child hunger and malnutrition. Ferrero also demonstrated working with an NGO in Burkina Faso by developing women's associations to support nutrition security actions and to support rural communities with good nutrition practices, with a specific focus on children.

sensitive programs. It is encouraged to define meaningful expected outcomes for its current employee wellbeing programs and undertake independent evaluations to assess the impact of the nutrition and physical activity elements of these. It is also advised that Ferrero further ensures that all its consumer-oriented healthy lifestyle programs, in all its markets, are only designed and/or implemented with diverse stakeholder groups that have relevant expertise.

- **LABELING:** As Ferrero's labeling commitments have not been rolled out for all its products globally, the company is encouraged to do so and publish the percentage of roll-out per market or by product. The company could also consider adopting an interpretative and government-endorsed FOP labelling format on all products, to provide indicators of how healthy the product is, rather than just numeric information. For this Index, Ferrero has not shown evidence of a commitment not to use nutrition and health claims on a product unless it meets the nutrition criteria of a government-endorsed NPM and/or criteria aligned with Codex Alimentarius. ATNI strongly recommends that the company makes relevant commitments in this area.

- **ENGAGEMENT:** Ferrero is advised to develop a public responsible lobbying policy, and commit to only lobby in support of measures designed to improve health and nutrition that have a solid grounding in independent, peer-reviewed science. Although the company publicly states that it voluntarily discloses its lobbying activities at EU-level via the EU Transparency Register, the level of information about these on its own domain is limited. It could consider increasing transparency about its lobbying activities and involvement with organizations that lobby on its behalf. Ferrero is also encouraged to engage with a diverse range of stakeholders to inform its nutrition strategy and policies, and demonstrate how this input was utilized by the company.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

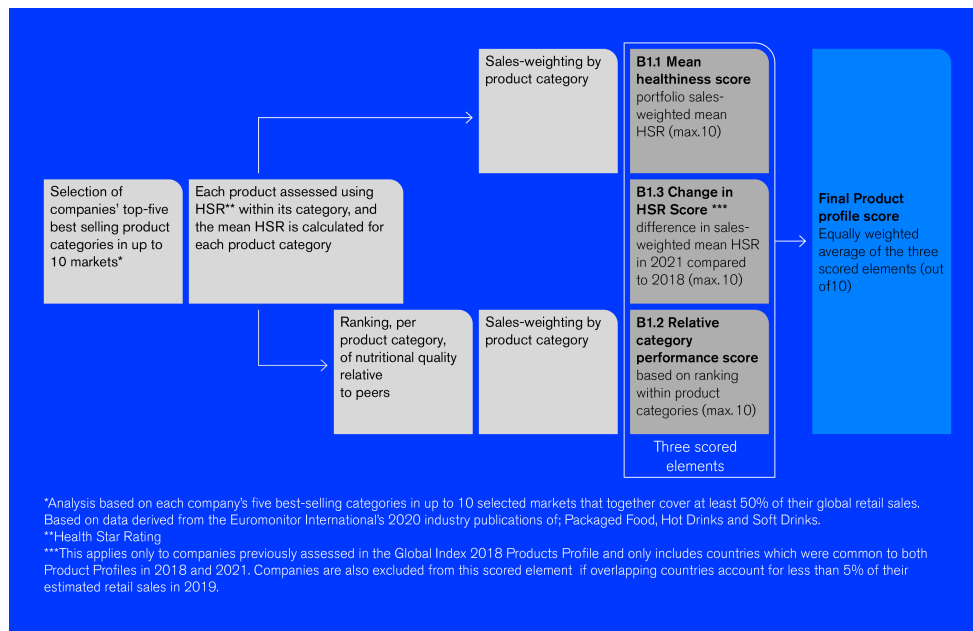


10

Rank 10 / Score 5.4

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



Ferrero has been assessed for the second time in the Global Index Product Profile. In the previous assessment, nine of the company's markets were selected, and a total of 272 products analyzed – accounting for approximately 20-25% of global retail sales in 2017, excluding baby foods, plain tea, and coffee. In this Index, a total of 1232 products have been analyzed across 10 of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 55-60% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

Germany and Italy are new countries included in this iteration. South Africa was included in the 2018 but has been omitted this time. In 2018, a total of 3 product categories were covered by the assessment, compared to 6 categories in 2021. Products from the 'Dairy', 'RTD Coffee', 'Sweet Biscuits, Snack Bars and Fruit Snacks' categories are assessed in 2021 but were not in 2018. Instead of the 'Spreads' category in 2018, the 'Sweet Spreads' category has been assessed in 2021.

In this Product Profile assessment, Ferrero's scores 2.1 out of 10 (B1.1) in the mean healthiness element, 4.2 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers, and 10 out of 10 (B1.3) for changes in nutritional quality (mean HSR) over time. This results in Ferrero obtaining an overall score of 5.4 out of 10 and ranking 10 out of 25 in the Product Profile.

B1.1 Portfolio-level Results


Average HSR (out of 5 stars) (sales-weighted)	10 Countries included	Range of global sales included 1	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥3.5 stars)	% retail sales healthy 2019 (≥3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥3.5 stars) 1	No. products assessed	% products suitable	% sales from suitable
1	Australia, China, Germany, Hong Kong, India, Italy, Mexico, New Zealand, UK, USA	55-60%	1232	2%	1%	1%	1324	0%	0%

- A total of 1232 products manufactured by Ferrero, sold in 10 countries, covering 6 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 1.0 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 2.1 out of 10 for Ferrero. The company ranks 25 out of 25 companies in this first scored element (B1.1).

- Overall, 2% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥3.5). Together, these products accounted for an estimated 1% of Ferrero's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 1% of its global retail sales from healthy products in 2019.

WHO nutrient profiling models (unscored): None (0%) of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 0% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR >= 3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) 
Baked Goods	60	0%	1.1	2	8th out of 9
Confectionery	1105	2%	0.9	1	4th out of 6
Dairy	6	0%	0.7	2.9	18th out of 18
RTD Tea	28	0%	1.5	1.7	5th out of 7
Sweet Biscuits, Snack Bars and Fruit Snacks	17	0%	1.2	1.8	7th out of 8
Sweet Spreads	16	0%	0.8	2.2	5th out of 5

- For Ferrero, 'RTD Tea,' was the best performing category, where a total of 28 products analyzed obtained mean HSR of 1.5 out of 5. Sweet spreads (0.8) had the lowest mean HSR of all product categories included for Ferrero.
- For 6 out of the 6 categories assessed, Ferrero's products perform worse than the mean HSR of companies selling products in the same categories.
- Ferrero scores 4.2 out of 10 in this second scored element (B1.2) and ranks 22 out of 25 companies. This is based on its ranking compared to peers within the 16 categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
Australia	18	50	0.8	0.9
China	8	26	0.5	0.5
Hong Kong	22	25	0.9	0.8
India	16	45	0.5	0.6
Mexico	9	46	0.5	0.8
New Zealand	4	18	0.9	1.6
UK	141	375	0.6	0.7
USA	42	261	0.9	1.5
TOTAL	260	846	0.7	1.2

- Ferrero showed an increase in mean HSR between the 2018 and 2021 Product Profiles (mean HSR=0.7 to 1.2). The change in HSR score only takes into account the eight countries included in both 2018 and 2021 assessments. For Ferrero, the large increase observed in mean HSR is likely attributed to a few key changes. For example, the decrease of proportion of sales deriving from the 'Confectionery' category, the subsequent introduction of the 'Sweet Biscuits, Snack Bars and Fruit Snacks' category (with a higher overall HSR), and the increase of (healthier) products included in the analysis.
- Adjusting scores by country sales weighted estimates (which gives more weight to company's largest markets), Ferrero achieves an increase of 0.5 in mean HSR between 2018 and 2021, resulting in a score of 10 out of 10 on this element using the scoring system set out in ATNI's methodology.

Full Product Profile report:

https://accesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

FrieslandCampina

Product categories assessed

Processed Meat and Seafood|Dairy|Other
Hot Drinks

Percentage of company global sales covered by Product Profile assessment

65-70%

Headquarters

The Netherlands

Number of employees

23816

Type of ownership

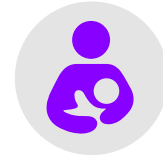
Cooperative



Product Profile ⓘ

Rank 3 / Score 5.9

Rank 4 (2018)



BMS/CF Marketing ⓘ

Rank 2 / Score 7.4

Rank 1 (2018) ⓘ

Rank 6 / Score 21%

Rank 4 (2018)

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 3

Score 5.9

Commitment

Performance

Disclosure

An adjustment of -1.18 to the company's score has been made based on its score in the BMS/CF Marketing Index 2021.

Company BMS/CF Scorecard:

https://acesstonutrition.org/app/uploads/2021/06/ATNI_Scorecard_FrieslandCampina.pdf

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS:** Although FrieslandCampina's score has slightly decreased from 6.0 in 2018 to 5.9 out of 10 in 2021, the company's overall rank has improved from the fourth to third place. The company ranks first in Category C 'Accessibility' and Category D 'Marketing'. It ranks 2nd on the Product Profile with a score of 7.4 out of 10 and performs above average in all index categories.
- **GOVERNANCE:** Through its updated 'Nutrition Policy', FrieslandCampina continues to place a strong strategic focus on nutrition and health, and addressing malnutrition. Published in 2020 as part of the company's updated 'Nutrition Policy', the 'Better Products Program' strives to ensure that at least 70 percent of its products are considered as 'nourishing for daily use' – as opposed to 'indulgent' – and that at least 70 percent of sold volume complies with their 'Global Nutritional Standards'. The program is based on the World Health Organization (WHO) Global Action Plan for the prevention and control of noncommunicable diseases 2013-2020, and explicitly seeks to address obesity/overweight and undernutrition.
- **GOVERNANCE:** Through its updated 'Broadening Access to Nutrition' program, the company seeks to address micronutrient deficiencies and undernutrition through a deliberate strategy of expanding access and improving the affordability of its fortified and nutritious products. Importantly, FrieslandCampina has sought to identify priority populations in the countries it's active in based on data from the WHO and the Food and Agriculture Organization (FAO), as well as regional studies South East Asian Nutrition Survey (SEANUTS) and Accelerating Nutrition Improvements in Sub-Saharan Africa (ANI).
- **PRODUCTS:** FrieslandCampina continues to implement the updated Global Nutritional Standards (GNS), its Nutrient Profiling Model (NPM) that sets criteria for both positive components (such as milk protein, fiber, vitamins, and minerals) and trans-fat, saturated fat, added sugar, and salt. The criteria for the latter group were derived from Choices International and developed by independent scientists. The company has benchmarked its GNS against the Health Star Rating system (HSR), finding a deviation of less than 10 percent in the estimated percentage of healthy products. Moreover, the company only fortifies products that meet its GNS criteria, and bases its approach on the WHO guidelines and CODEX CAC/ GL 2-1985.
- **ACCESSIBILITY** FrieslandCampina is commended for its strong performance in pricing and distribution (Category C). As part of its updated 'Broadening Access to Nutrition program', the company has enhanced its commitments, strategies, and practices by effectively adopting a policy on affordability and accessibility. The concrete, measurable targets linked to this program stand out. One of the company's objectives is to increase the share of affordable nutrition products in its lower-income markets (Nigeria, Pakistan, Ivory Coast, Indonesia, Vietnam, and the Philippines) to at least 15 percent of sold volume in 2025. Additionally, the program aims to increase the percentage of affordable nutrition products that comply with its own Affordable Nutritional Standards in these markets to at least 50 percent by 2025. In its efforts to improve the

Priority areas for improvement

- **PRODUCTS:** The FrieslandCampina Global Nutritional Standards set limits on levels of sodium, saturated fats, and added sugars for all products that the company positions as 'tailored nutrition', 'affordable nutrition', and 'daily nutrition'. However, these limits are not applied to products positioned as 'treats and taste enhancers'. ATNI encourages the company to set targets for limiting negative nutrients in this product category, and to increase its transparency around how these are defined and what parts of its portfolio they will cover.
- **ACCESSIBILITY:** FrieslandCampina could consider expanding the scope of its strategy and targets by aiming to reach all consumers, including priority populations, in all the markets it is active in, with affordable, accessible healthy products, and report on progress made. The company is encouraged to provide evidence of conducting pricing and distribution analysis in all markets it is active in, including middle- and high-income countries, to reach low-income consumers and those with limited physical access (e.g., in food deserts and poor urban areas).
- **LIFESTYLES:** While the company commits to supporting employee health and wellness through its 'Boost (Boest) Vitality Programme', this only covers direct employees of the company. ATNI recommends that the company improves its score by extending the same program to employees' family members and other value chain actors, such as smallholder farmers, factory workers, and small-scale vendors. The company could also consider making public commitments to allowing parents to take paid parental leave up to 26 weeks and more, and to providing breastfeeding mothers with appropriate conditions and facilities at work.
- **LABELING:** On the use of health and nutrition claims, FrieslandCampina shows limited commitments. To prevent misuse of claims, or the placement of claims on unhealthy products, it is recommended that the company commits to not using claims on products unless they have been pre-determined as 'healthy' by a relevant (preferably government-endorsed) NPM. This should be applied to all products and markets that the company is active in. In addition, to strengthen its performance on product labeling, ATNI encourages the company to make public commitments not to provide additional interpretive labeling or other information FOP that directly relates to the message of the mandatory FOP labeling (which may confuse consumers or modify the effect of the mandatory labeling).
- **ENGAGEMENT:** ATNI advises that FrieslandCampina publicly commits to only lobby in support of measures designed to improve health and nutrition that have a solid grounding in independent, peer-reviewed science. It could consider developing adequate internal controls to ensure their lobbying activities align with company policy, such as assigning oversight and conducting audits of its lobbying activities to the Board. The company is also encouraged to consider increasing its transparency regarding lobbying expenditures and activities in the markets in which it is active.

accessibility of its affordable healthy products, FrieslandCampina has conducted robust pricing and distribution analysis, and shares examples of arrangements made with distributors regarding how healthy products are made accessible in several low- and middle-income countries.

- **MARKETING:** Apart from committing to adhere to the International Chamber of Commerce (ICC) Framework for Responsible Food and Beverage Marketing Communications, FrieslandCampina is the only company to make explicit commitments for marketing strategies to reach priority populations – providing evidence of taking steps to understand and reach these with appropriate products through tailored marketing, and does so on a global scale. Through its Broadening Access To Nutrition programme¹, the company uses a promotion strategy of advertising, social media, and educational messages, all adapted to the country and local distribution channels used by the target group and brand. One example is the promotion of its small-packaged and small-sized Peak product in Nigeria through TV, and commercials and educational messages on Facebook.

- **MARKETING:** FrieslandCampina has updated its responsible marketing policy, the Corporate Standard for Responsible Marketing Communications. Through this, the company commits to only market products to children under 12 years old that meet the FrieslandCampina Nutrition Criteria for Marketing Towards Children, while also committing to using responsible marketing techniques to do so. The policy also regulates the deployment of children, celebrities (including influencers), or fantasy and animated characters, and the responsible use of promotional toys, games, vouchers, and competitions. Furthermore, the company utilizes tools to ensure its digital marketing does not reach younger age groups and applies these to all own- and third-party digital media.

- **LABELING:** Friesland Campina performs strongly on its front-of-pack (FOP) and back- of-pack (BOP) product labelling commitments and disclosures. The company is one out of three companies that commits to using interpretative labeling on all relevant products, globally. This is a huge improvement from only displaying nutrients in numeric format in 2018, as using interpretative labelling is industry best practice. It provides nutritional information to consumers in a clear and easy-to-read format, and can help consumers make more informed, healthier choices. The company has also advanced on implementing its BOP labelling commitments to more than 90% of products globally, an increase from more than 80% of products in 2018.

- **ENGAGEMENT:** The company is one of only four committing to play an active role in supporting governments' efforts to combat all forms of malnutrition on a global scale, while providing examples of working with the European Union and governments of the Netherlands and Philippines. In addition, FrieslandCampina receives credit for disclosing its lobbying measures with the Netherlands Ministry of Health and Malaysian Ministry of Health, regarding lowering sugar content with the results from SEANUTS research. The company showed evidence of engaging with a wide range of stakeholders in developing its nutrition strategy, policies, and programs,

- **ENGAGEMENT:** In 2019, the company created an Advisory Council to advise the 'FrieslandCampina Institute', a non-commercial source of scientific research for nutrition and health professionals, consisting of international multidisciplinary researchers in the area of malnutrition, nutrition, population health, and consumer behavior. However, it is not clear if the company has an expert advisory group advising on its commercial nutrition strategy.

- **BREAST-MILK SUBSTITUTES AND COMPLEMENTARY FOODS:** To fully align with the Code, FrieslandCampina is encouraged to fully incorporate World Health Assembly (WHA) 69.9 recommendations in its BMS marketing policy which strengthen and/or clarify the scope and recommendations of the original 1981 Code, and the subsequent relevant resolutions. It is also advised that the company extends coverage of its BMS marketing policy to growing-up milks. ATNI further recommends the company to commit to upholding that policy and associated standards and guidelines in countries where local regulations are less stringent and less comprehensive than its own policy, in respect of product scope and/or Code provisions.

including international organizations, national bodies, CSOs, and academic institutions or scientific experts.



Category Analysis

Commitment **Performance** **Disclosure**

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment **Performance** **Disclosure**

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

Commitment **Performance** **Disclosure**

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- C1** Product pricing
- C2** Product distribution



Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- D1** Marketing policy
- D2** Marketing to children
- D3** Auditing and compliance

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- E1** Employee health
- E2** Breastfeeding support
- E3** Consumer health

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- F1** Product labeling
- F2** Claims

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- G1** Influencing policymakers
- G2** Stakeholder engagement

Detailed Product Profile Results ¹

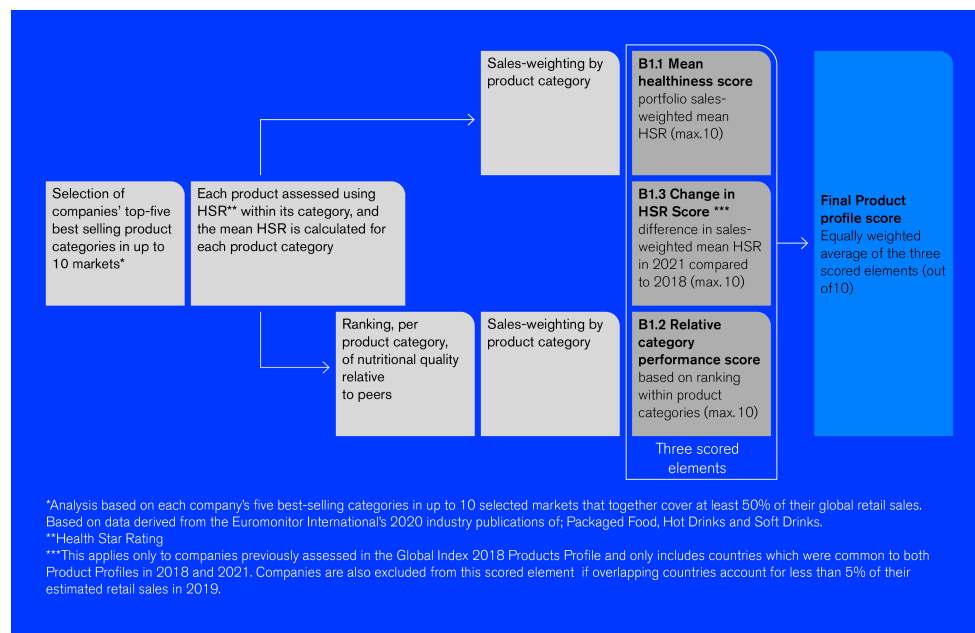


2

Rank 2 / Score 7.4

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers, and; B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



FrieslandCampina has been assessed for the second time in the Global Index Product Profile. In the previous assessment, two of the company's markets were selected, and a total of 24 products analyzed – accounting for approximately 0-5% of global retail sales in 2017, excluding baby foods, plain tea, and coffee. In this Index, a total of 494 products have been analyzed across 10 of the company's major markets. Products from the top five best-selling product categories within each market are included. In 2019, these products accounted for 65-70% of the company's global retail sales, excluding baby foods, plain tea, and coffee.

Germany, Indonesia, The Netherlands, Nigeria, The Philippines, Russia, Thailand, and Vietnam are new countries included in this iteration. In 2018, one product category was covered by the assessment, compared to three categories in 2021. Products from the 'Other Hot Drinks' and 'Processed Meat and Seafood' categories are assessed in 2021 but were not in 2018.

In this Product Profile assessment, FrieslandCampina's scores 6.5 out of 10 (B1.1) in the mean healthiness element, and 8.3 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers. This results in FrieslandCampina obtaining an overall score of 7.4 out of 10, ranking second out of 25 in the Product Profile.

B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	10 Countries included	Range of global sales included i	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥3.5 stars)	% retail sales healthy 2019 (≥3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥3.5 stars) i	No. products assessed	% products suitable	% sales from suitable
3.3	Germany, Hong Kong, Indonesia, Netherlands, Nigeria, Philippines, Russia, Thailand, United Kingdom, Vietnam	65-70%	494	56%	59%	55%	494	32%	25%

▪ A total of 494 products manufactured by FrieslandCampina, sold in 10 countries, covering three product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 3.3 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 6.5 out of 10 for Friesland. The company ranks third out of 25 companies in this first scored element (B1.1).

▪ Overall, 56% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥3.5). Together, these products accounted for an estimated 59% of Nestle's retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food, plain tea, and coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 55% of its global retail sales from healthy products in 2019.

WHO nutrient profiling models (unscored): Only 32% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 25% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR ≥3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category) i
Other Hot Drinks	1	0%	1.5	1.4	3rd out of 5
Dairy	483	56%	3.4	2.9	4th out of 18
Processed Meat and Seafood	10	90%	3.8	3.1	4th out of 8

- For FrieslandCampina, 'Processed Meat and Seafood' was the best performing category, where a total of 10 products analyzed obtained mean HSR of 3.8 out of 5. 'Other Hot Drinks' (1.5) had the lowest mean HSR of all product categories included for FrieslandCampina.
- For three out of three categories assessed, FrieslandCampina's products perform better than the mean HSR of companies selling products in the same categories.
- FrieslandCampina scores 8.3 out of 10 in this second scored element (B1.2) and ranks third out of 25 companies. This is based on its ranking compared to peers within the 16 categories, using the scoring system set out in ATNI's methodology.

B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
TOTAL	0	0	0	0

Not applicable for this company. This third scored element applies only to companies assessed in both Index's and takes into account only those countries included in both assessments. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.] included in both assessments. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.] included in both assessments. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.] included in both assessments. Companies are also excluded from this scored element if overlapping countries account for less than 5% of their estimated retail sales in 2019.] included in both assessments.

Full Product Profile report:

https://accesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf

Breast-milk Substitutes / Complementary Food Marketing



6

Rank 6 / Score 21%

Rank	BMS Marketing	Adjustment to Global Index Score ⁱ	BMS 1	BMS 2	Level of compliance in country studies	
		Max. of -1.5			Philippines	Mexico
6	21%	-1.18	42%	0%	NA	Low (0%)

- FrieslandCampina is one of the six Index companies included in the BMS/CF Marketing Index. Its score is based on two assessments: BMS/CF 1 which assessed the company's policy commitments, management systems and disclosure relating to the marketing of its BMS products, and BMS/CF 2 which assessed its marketing practices in Mexico during 2020. Its BMS/CF 2 score is solely based on the study in Mexico as the Philippines is not an official market for its BMS and CF products. The BMS/CF Marketing Index score is used to generate a proportionate adjustment to the final Global Index score.
- FrieslandCampina ranks sixth in the BMS/CF Marketing Index with a level of compliance with ATNI's updated methodology (including WHA 69.9) of 21%.
- FrieslandCampina's BMS marketing policy, which has not changed since the 2018 Index, is substantially aligned with The Code, though the same gaps remain as the company does not fully incorporate the recommendations in the guidance associated with WHA resolution 69.9 and continues to have weak commitments in relation to BMS lobbying. The company's management systems are generally quite strong and have improved since 2018 as FrieslandCampina developed and shared several procedures and other documentation relating to various articles of The Code. FrieslandCampina has also published much more material since the 2018 Index which is reflected in its improved disclosure score.
- The principal reason behind the company's lower score in the 2021 Index is due to ATNI gaining a better insight into the application of its BMS marketing policy in both higher- and lower-risk markets. Although it is applied globally covering infant and follow-on formula, including formulas for special medical purposes, up to 12 months of age, the company commits to fully uphold its policy only in markets with no relevant regulation. In markets where legal measures are in place, it defers to those regulations, both in terms of the products within their scope and the provisions relating to marketing and labeling, even where they are less stringent and comprehensive than its own policy. Thus a higher penalty was applied in the 2021 assessment resulting in an overall score on BMS/CF 1 of 42%.
- To improve its score, FrieslandCampina is encouraged to revise its policy to fully incorporate WHA 69.9 recommendations and extend its scope to growing-up milks. The company is also advised to incorporate commitments relating to responsible lobbying on BMS issues. FrieslandCampina should commit to uphold this policy in countries where local regulations are less stringent and less comprehensive in terms of product scope and/or Code provisions (associated standards and guidelines should be similarly applied).
- As in the 2018 Index, FrieslandCampina scores 0% in the in-country marketing study, being rated as having a low level of compliance with The Code in Mexico.
- To bring its marketing practices into line with The Code in Mexico, it is important that FrieslandCampina extends its policy to growing-up milks, as most of the non-compliances found were in relation to these products. In Mexico – and in all other markets – FrieslandCampina should particularly reinforce its policy stance that its BMS

products should not be discounted or otherwise promoted in all physical and online retailers. It should also ensure that all labels contain the required information and instructions set out in WHA resolution 61.20 on the appropriate preparation of powdered formula.

BMS/CF Chapter Global Index 2021:

<https://acesstonutrition.org/index/global-index-2021/bms-chapter-global-index-2021/>



General Mills

Product categories assessed

Baked Goods|Breakfast Cereals|Dairy|Ice Cream and Frozen Desserts|Ready Meals|Rice, Pasta and Noodles|Sauces, Dressings, Condiments|Soup|Sweet Spreads|Sweet Biscuits, Snack Bars and Fruit Snacks

Percentage of company global sales covered by Product Profile assessment
65-70%

Headquarters
U.S.

Number of employees
40000

Type of ownership
Public



Product Profile ⓘ

Rank 12 / Score 3.1

Rank 12 / Score 4.5

Rank 15 (2018)

Rank 9 (2018) ⓘ

Important:

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Corporate Profile

Rank 12 Score 3.1

Commitment Performance Disclosure

The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

Main areas of strength

- **SCORES AND RANKS:** The company's score has increased from 2.3 in 2018 to 3.1. Accordingly, its rank has increased from 15th place to 12th. This increase reflects significant improvements in their Nutrient Profiling Model (NPM), responsible marketing policy, labelling policy and lobbying disclosure.
- **GOVERNANCE:** As of 2020, General Mills has formally set out on its website how it seeks to address various forms of malnutrition. For example, it commits to offering more low-calorie and portion control options, alongside more scientific communication, in order to address obesity. It also commits to addressing cardiovascular diseases by delivering vegetables, whole grains and low-fat dairy in its product portfolio. The company has an emphasis on nutrient-dense foods, like fortified cereals, low-fat and non-fat yogurts, and whole grain granola bars, to deliver beneficial nutrients (such as vitamins, minerals, protein and/or fiber) to its consumers, while balancing nutrients to limit those such as sodium, sugar, and saturated fat. The company shows that it uses data from public health authorities in the US to inform its strategy, especially in relation to fortification.
- **PRODUCTS:** In 2019, the company moved beyond its US-specific 'Health Metric' criteria and introduced a new health assessment system, 'Nutrition-Forward Foods', which now applies to its global portfolio. To qualify, a product must meet one of two conditions: either 1) provide at least eight grams of whole grain, or half a serving fruit, vegetables, low-/non-fat dairy, or nuts/seeds per labelled serving; or 2) meet the US Food and Drug Administration (FDA) 'Healthy' criteria. The company discloses on its website that, in 2020, 43 percent of its global sales in volume met either one of these criteria. The second condition is particularly commendable, since it aligns with a government-endorsed Nutrient Profiling Model (NPM) and assesses both positive and negative nutrients. That said, while the first condition, formulate by the company, reflects the the company's emphasis on nutrient-density and whole foods, it lacks a threshold for negative nutrients.
- **MARKETING:** As in 2018, General Mills does not advertise products to children under 12 that do not meet the relevant self-regulatory programs' criteria in their respective markets, such as the Children's Food and Beverage Advertising Initiative (CFBAI) criteria in the US and EU Pledge in Europe. They commit not to advertise such products on media where children under 12 represent 30 percent or more of an audience, utilizing various tools when it comes to digital media such as age screening, reviewing age-related data, and assessing the nature of third-party websites. The company also commits not to advertise in primary or secondary schools or advertise to children under the age of six.
- **LIFESTYLES:** The company supports several community programs addressing health and nutrition, cooking and physical fitness – in Minneapolis and Buffalo in the US, and Toronto in Canada. They are designed and co-implemented with local CSOs that have relevant expertise to ensure they meet the needs of local residents and participants. To assess the programs' impact, evaluations

Priority areas for improvement

- **GOVERNANCE:** While General Mills has a commercial strategy for addressing better nutrition for the general consumer, limited evidence was found of the company seeking to address the needs of priority populations at risk of malnutrition as defined by relevant health and/or social care authorities. The company is encouraged to engage in market research to assess unmet needs of priority populations in all markets where it is active, and conduct a strategic review of the commercial opportunities in addressing them. While the company publicly discloses that its CEO has ultimate responsibility for its Health and Nutrition strategy, it does not link remuneration arrangements to performance on nutrition targets or objectives. General Mills is encouraged to develop concrete accountability arrangements for the implementation of the company's nutrition strategy, including for its efforts to address undernutrition and/or micronutrient deficiencies and improving the affordability and availability of its healthy products.
- **PRODUCTS:** Despite committing to "continue to improve the health profile of US retail products", the company has not set any targets for reducing levels of sodium, saturated fat, and added sugar/calories, or to increase positive ingredients like fruits, vegetables, nuts and legumes (FVNL), and whole grains. The company is encouraged to set SMART targets that cover all relevant product categories and nutrients of concern relevant to their product portfolio. It is important that product formulation and reformulation are addressed comprehensively at this level.
- **PRODUCTS:** While the 'Nutrition-forward Foods' criteria is an improvement on the company's previous system of defining 'healthy', there remains room for further progression. General Mills' requirements regarding whole grains, fruit, vegetables, low-/non-fat dairy, and nuts/seeds content do not stipulate a limit on 'negative nutrients'; meaning that products high in sodium, saturated fat, or added sugar can still be considered a 'nutrition-forward food' by the company's definition. Secondly, the company could consider ensuring that it only fortifies products that meet its nutrition criteria (with limits on negative nutrients).
- **ACCESSIBILITY:** General Mills does not have a clear commitment or strategy to improve the affordability and accessibility of its healthy products (i.e., 'Nutrition-Forward Foods'), especially for low-income groups and priority populations, beyond participation in US federal subsidy programs like the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). The company is encouraged to make companywide public commitments on addressing the affordability of its healthy products (according to objective nutrition criteria) and to develop concrete strategies with objective, SMART targets to reach consumers – especially those living in poor socio-economic conditions and food deserts, across all markets where the company operates, and not only in the US.
- **MARKETING:** Similarly to 2018, General Mills is encouraged to publish its policy on responsible marketing

are undertaken either by the company itself or third parties involved in the project.

- **LABELING:** General Mills has improved on its labelling commitments since 2018. The company now commits to show more nutrients in a numeric format, providing the percentage Guideline Daily Amount. The company has expanded the rollout of its front-of-pack (FOP) and back-of-pack (BOP) labeling commitments to more markets, with FOP labeling now covering Australia, Europe and the US, and more than 90 percent of its products globally.
- **ENGAGEMENT:** General Mills has significantly improved disclosure on its lobbying related to nutrition – publishing a web page describing numerous examples of its engagement with the US government (at both Federal and State levels) in relation to various nutrition-related subjects, with links to relevant documentation. These include school feeding programs and addressing food insecure communities; supporting strong Dietary Guidelines for Americans and redefining the official FDA 'healthy' definition; and labelling and marketing. The company is one of only three to publicly disclose a commentary on their lobbying measures to prevent and address all forms of malnutrition, and state that it lobbies in support of responsible marketing legislation in the US. The company is also one of four assessed in this Index to have effective management systems in place to manage and control their lobbying: such as an internal whistleblowing mechanism, 'Speak Up'; Board oversight of lobbying positions, processes and practices through a Public Responsibility Committee; and internal audits of lobbying activities, shown via a 'compliance statement'. General Mills has a formal panel of experts in place – the Bell Institute Health & Nutrition Council – consisting of a range of medical professionals and academics, who provide input on the company's strategies, policies and research programs to prevent and address obesity and diet-related chronic diseases. In addition, the company actively engages with the Obesity Round Table and Portion Balance Coalition on this subject.

to all consumers, clearly indicating which media are covered. It could also consider pledging to adhere to the International Chamber of Commerce (ICC) Framework and commission annual independent audits on compliance with its policy. The company is encouraged to improve its advertising policy by adopting a more stringent and consistent global approach, rather than varying restrictions by market. For example, it could apply the CFBAI criteria for marketing products globally, or only advertise products meeting World Health Organization (WHO) regional standards.

- **LIFESTYLES:** While the company provides lactation rooms for new mothers returning to work, and fridges for storing breastmilk, in its Twin Cities office locations in its home market, the company is encouraged to expand these provisions to all its offices. It is also recommended to commit to allowing breastfeeding mothers breaks to express breastmilk and provide functional or flexible working arrangements to support them. ATNI advises this be published in a formal policy.

- **LABELING:** As in 2018, General Mills is advised to commit to international guidelines regarding the use of health and nutrition claims, or have a policy to determine whether products can carry claims in markets where nutrition and health claims are not regulated. The company is encouraged to establish a commitment to follow Codex guidance with regard to health/nutrition claims in markets where national regulatory systems are weaker than the latter, or absent entirely. Best practice would include tracking and disclosing the percentage of products carrying health and/or nutrition claims in all markets.

- **ENGAGEMENT:** The company engages with several CSOs, such as the Center for Science in the Public Interest (CSPI) and Portion Control Alliance, and academic institutions. However, it is encouraged to actively engage with a wider range of stakeholders, both local and international, and develop a well-structured and focused stakeholder engagement strategy to improve the development of the company's nutrition strategies, policies, or programs.

Category Analysis

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- A1** Nutrition strategy
- A2** Nutrition management
- A3** Reporting quality

Commitment Performance Disclosure

The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

- B1** Product Profile
- B2** Product formulation
- B3** Defining healthy products

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