

Flora FG's Specifications

Regional Headquarter

Kenya

Global Headquarter

Netherlands

Market Share Range¹

0% - 5%

Type of Ownership

Private (primary owner: Kohlberg Kravis Roberts & Co.)

Categories assessed in Product Profile

Butter and Spreads, Sweet Spreads

Important - The findings of this Index rely to a large extent on the information shared by companies, in addition to what is found in the public domain. In the case of limited, to no engagement by the companies, this assessment may not represent the full extent of their efforts.

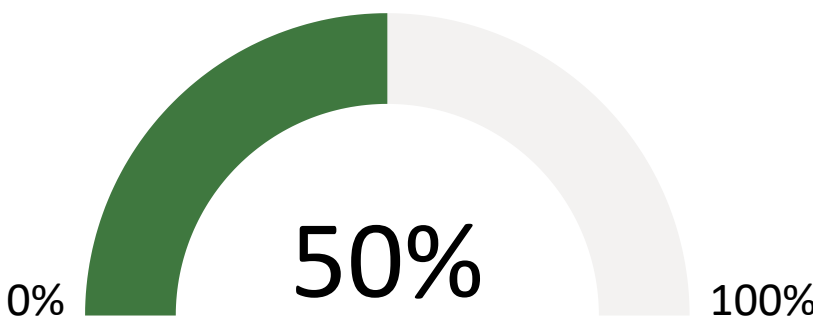
Footnote:

1. Euromonitor International, Staple Foods Industry edition, 2022

Overall Product Profile Results

The results below show the percentage of "healthier" products, or products passing the model's criteria, for the company's overall portfolio, as assessed by different nutrient profiling models.

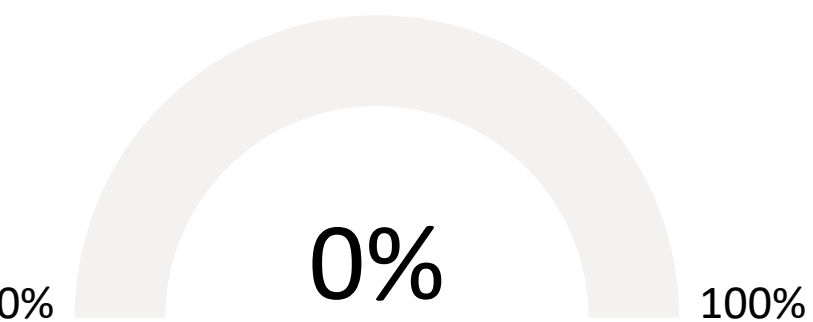
% products passing KNPM



Out of **6** products assessed across all ATNi applicable categories, 50% pass **the Kenyan Nutrient Profiling Model**.

The **Kenyan Nutrient Profile Model** was developed to underpin front of package labelling requirements in Kenya. It sets thresholds for total fat, saturated fat, total sugars, and sodium across 21 categories of processed foods.

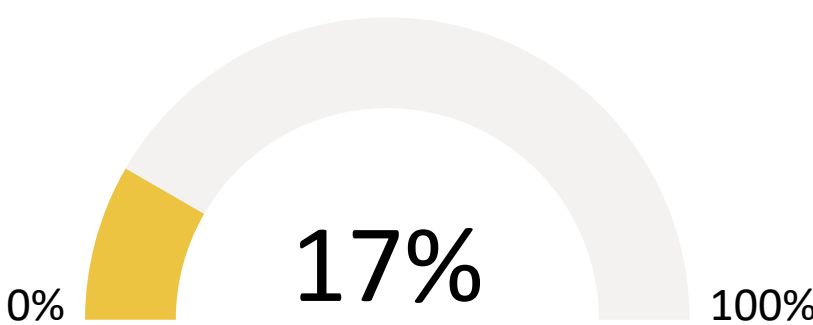
% products meeting WHO AFRO eligibility criteria



Out of **6** products assessed across all ATNi applicable categories, 0% meet the **WHO AFRO** eligibility criteria for marketing to children.

The **WHO AFRO model** is designed for use by WHO African Region Member States, this model supports policies to restrict food marketing to children. It categorizes products into 25 categories and applies nutrient thresholds per 100g/mL. Products must meet all thresholds to be eligible for marketing. Results are binary: 'marketing permitted' or 'marketing not permitted'.

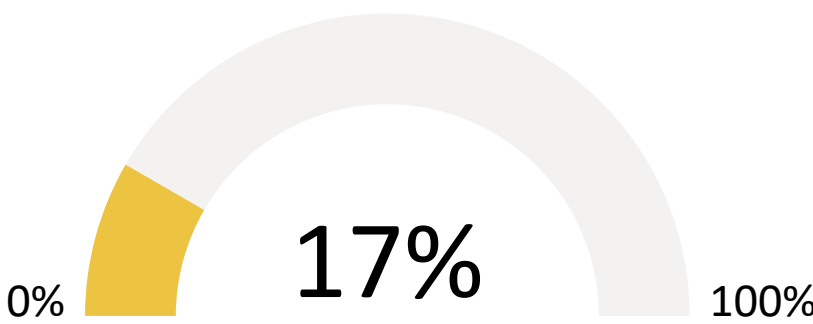
% healthier products - HSR



Out of **6** products assessed across all ATNi applicable categories, 17% are considered healthier based on **the HSR model** and healthier threshold of 3.5 stars or above.

The **Health Star Rating (HSR)** is a front-of-pack interpretive nutrition labelling system designed to help consumers make healthier choices. It scores products from 0.5 (least healthy) to 5 stars (most healthy), based on nutrients to limit (energy, sodium, total sugar, saturated fat) and positive food components (fruit/vegetable content, protein, fiber) on the basis of nutritional composition per 100g or 100mL across one of six categories. Products scoring 3.5 stars or higher are considered 'healthier'. ATNi uses the HSR in its Global Index and Country Spotlight Indexes to enable cross-company comparisons.

% healthier products - mHSR + micronutrients



Out of **6** products assessed across all ATNi applicable categories, 17% are considered healthier based on **mHSR+ micronutrient model**.

The **mHSR + micronutrients (HSR+)** model was developed by The George Institute in collaboration with ATNi. The HSR+ model builds on the original HSR by incorporating six key micronutrients: iron, vitamin A, vitamin B12, vitamin D, folic acid, and iodine. This allows for better differentiation of products based on micronutrient content.

Findings

☐ Nutrition strategy

Flora FG published a multi-faceted global ‘Nutrition Policy’ in 2024, which focuses on maintaining “affordability for consumers in lower socio-economic groups,” "outperforming benchmarks on saturated fat and salt, with no trans fat," and fortifying products “with adequate levels of micronutrients.”

☐ Strategy reporting

The company provided evidence of monitoring the nutritional quality of select products in the Kenyan market against the company’s own nutrition criteria, as well as for the percentage of its Kenyan portfolio meeting saturated fat targets. However, it does not publicly report on these efforts.

☐ Board overview

While the global Nutrition Policy is reviewed at the Board/executive level, it is unclear whether the Policy is also reviewed by senior management at the Kenya or Africa regional market level.

☐ Executive accountability and remuneration

The company’s 2023 ESG Addendum states that responsibility for the company’s nutrition strategy sits with the global Chief Operations Officer. The company confirmed that executive remuneration is not linked to any nutrition-related KPIs.

Recommendations

☐ Strategy reporting

In addition to recommendations outlined in Flora FG’s assessment in the 2024 Global Index, the company is encouraged to publish more detailed reporting on the implementation of its strategy in Kenya, including the percentage of its sales value or volume in Kenya derived from products defined as ‘healthier’ according to a government-endorsed NPM such as the HSR, Nutri-Score, UK NPM, or Kenya NPM. It is also recommended to report on the proportion of these sales that meet its definition of ‘affordable’, and the percentage of ‘affordable’ products that are fortified.

☐ Board overview

The company is encouraged to have senior management at the Kenyan or Africa regional level review progress against the strategy on at least an annual basis.

☐ Executive accountability and remuneration

The company is recommended to assign formal accountability for the implementation of the nutrition strategy in Kenya to a senior executive at the Kenyan level. Additionally, the company is encouraged to link executive remuneration to at least one of the nutrition strategy’s targets or metrics.

* Statements in the report and company result cards which are about the lack of information/evidence in the public domain are carefully worded to avoid implying that the company does not have a specific policy, strategy, or target. Rather, the statements indicate that while these policies, strategies or targets may exist internally, they are not published publicly in a report, on a public website or on an online platform. These could not be reviewed during the research period, nor were they shared with ATNi during that research period.

Findings

☐ **Targets for nutrients of concern**

The company has established targets within its Nutrition Benchmarking Programme for all nutrients of concern (sodium, added sugar, and saturated fats), and provided concrete evidence of how these global targets translate to the Kenyan market. Additionally, the company committed to achieve 100% compliance with its targets by 2030. However, these targets do not cover all relevant products in the company’s portfolio.

☐ **Elimination of industrially produced trans fats (iTfAs)**

The company provided evidence that it has reduced levels of iTfAs in its Kenyan portfolio in line with the WHO recommendation of <2g iTFA per 100g of fats and oils. Additionally, the company provided evidence of methods in place to prevent the reintroduction of trans fats in its portfolio.

☐ **Targets for positive nutrients**

Ingredients such as minimally processed fruits, vegetables, nuts, legumes and wholegrains are not relevant to the company’s portfolio.

☐ **Reporting progress**

The company shared evidence of reducing levels of saturated fats in its product portfolio in Kenya, but does not report this on the public domain.

Recommendations

☐ **Targets for nutrients of concern**

The company is recommended to extend and publish its targets for reducing levels of nutrients of concern (sodium, added sugars, and saturated fats) to all relevant product categories in its portfolio and publicly disclose how these targets translate to the Kenyan market.

☐ **Elimination of iTfAs**

The company is recommended to publish information on how it prevents the reintroduction of iTfAs in its portfolio in Kenya.

☐ **Reporting progress**

The company is encouraged to publicly report on annual progress against reformulation targets in the Kenyan market using quantitative metrics.

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Findings	Recommendations
<div> <div> <div></div> <div>Fortified products</div> </div> <div> <p>Of the six products produced by Flora FG that were identified for ATNi’s Product Profile, five were found to have micronutrient data available and micronutrients listed in ingredient information, therefore 5 were classified as fortified in this assessment. These included butter and spreads (4 fortified products), and sweet spreads (1).</p> </div> </div> <div> <div> <div></div> <div>Fortification policy</div> </div> <div> <p>Flora FG was found to voluntarily fortify margarine and sweet spreads. The company’s public global Nutrition Policy outlines its commitment to adhere to CODEX CAC/GL9-1987 General Principles for the Addition of Essential Nutrients to Foods. This commitment is in line with standards set out by the Kenyan government.</p> </div> </div> <div> <div> <div></div> <div>Quality control mechanisms</div> </div> <div> <p>The company shared evidence outlining quality control or assurance methods to determine whether the levels of micronutrient(s) are sufficient in the fortified products if fortifying their own products.</p> </div> </div>	<div> <div> <div></div> <div>Fortification policy</div> </div> <div> <p>Flora FG is advised to strengthen its Nutrition Policy by committing to not fortify or enrich products that are 'less healthy', according to a government-endorsed NPM such as the HSR, Nutri-Score, UK NPM, or Kenya NPM.</p> </div> </div> <div> <div> <div></div> <div>Quality control and assurance</div> </div> <div> <p>The company is advised to improve its transparency by publishing the processes it has in place to determine whether the levels of micronutrient(s) are sufficient in the final fortified product.</p> </div> </div>

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Findings	Recommendations
<div><div><input type="checkbox"/> Nutrient profiling</div><div>The company uses its own nutrient profiling model (NPM), the Nutrition Benchmarking Programme, to assess the healthiness of its global product portfolio.</div><div><input type="checkbox"/> Reporting on portfolio healthiness</div><div>Flora FG was not found to report on sales of products classified as ‘healthier’ either globally or in Kenya.</div></div>	<div><div><input type="checkbox"/> Nutrition criteria</div><div>As a next step, the company is encouraged to adopt a government-endorsed nutrition profiling model (NPM) such as the HSR, Nutri-Score, UK NPM, or Kenya NPM for reporting on product healthiness globally and in the Kenyan market, and publicly disclose on an annual basis the percentage of products classified as ‘healthy’.</div><div><input type="checkbox"/> Healthy sales target</div><div>The company is recommended to establish a target to increase the percentage of products and sales value or volume in the Kenyan market that meet the criteria of an NPM.</div><div><input type="checkbox"/> Transparency of NPM application</div><div>The company should be transparent about how the NPM was applied to its portfolio, specifying which product categories are included and how the products are categorized, for example.</div></div>

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Findings

- ☐ **Affordable nutrition strategy**
 Flora FG has published a global commitment to maintain the affordability of its general product portfolio. Information on whether the company’s commitment addresses the affordability of ‘healthy’ products relative to ‘less healthy’ products in Kenya was not found.
- ☐ **Defining ‘affordability’**
 The company measures its commitment through the “percentage of people from lower socio-economic groups reached with [its] products” across various markets, including Kenya.

Recommendations

- ☐ **Affordable nutrition strategy**
 The company is advised to adopt and publish a strategy to ensure that ‘healthier’ products, according to a government-endorsed NPM, are priced affordably for low-income consumers in Kenya.
- ☐ **Relative affordability**
 Flora FG is encouraged to measure the price differential between ‘healthier’ products relative to products that do not meet formal nutrition criteria and work on improving the differential between them.
- ☐ **Reporting progress**
 The company is advised to report quantitatively on its progress to improve the price differential between ‘healthier’ and ‘less healthy’ products across the whole portfolio in Kenya.

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Findings	Recommendations
<div> <div> <div></div> <div>Responsible marketing to children</div> </div> <div> <p>Flora FG has published a global policy for responsible marketing to children which commits not to market any products to children under 12.</p> </div> </div> <div> <div> <div></div> <div>Marketing policy scope</div> </div> <div> <p>The company's policy applies to “all our brand marketing communications,” including TV/radio, print media, outdoor advertising, cinema, third-party websites, social media, primary and secondary schools, licensed characters, celebrities and influencers, toys, in-store/point-of-sales marketing and sponsorship.</p> </div> </div> <div> <div> <div></div> <div>Audience threshold</div> </div> <div> <p>Flora FG uses an audience threshold of >35% for defining child-oriented programmes on measured media.</p> </div> </div>	<div> <div> <div></div> <div>Responsible marketing to children</div> </div> <div> <p>Flora FG is recommended to specify in the public domain how its responsible marketing policy is applied in the Kenyan market.</p> </div> </div> <div> <div> <div></div> <div>Age threshold</div> </div> <div> <p>The company is encouraged to strengthen its commitments for responsible marketing to children by increasing the age threshold for defining a child to 18, in line with the Kenya Information and Communications (Broadcasting) Regulations, 2009.</p> </div> </div> <div> <div> <div></div> <div>Marketing policy scope</div> </div> <div> <p>Flora FG is encouraged to extend the list of media channels and marketing techniques to include those outlined in World Health Organization and UNICEF policy guidance, including mobile/SMS, on-pack advertising, or brand equity characters for example.</p> </div> </div> <div> <div> <div></div> <div>Audience threshold</div> </div> <div> <p>The company is recommended to lower the audience threshold to >25% on measured media to determine whether a channel is considered ‘child-directed’ to decrease the risk of its advertisements reaching children in Kenya.</p> </div> </div> <div> <div> <div></div> <div>Auditing compliance</div> </div> <div> <p>The company is encouraged to commission an independent third-party audit of its policy for responsible marketing to children in the Kenyan market. The audit should cover a comprehensive variety of media channels and techniques. The company is encouraged to publish the results of its audit.</p> </div> </div>

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Findings	Recommendations
<div> <div> <div></div> <div>Workforce nutrition program</div> </div> <div> <p>The company indicated to ATNi that it has provisions in place to support workforce nutrition in Kenya covering three of the four Workforce Nutrition Alliance (WNA) pillars, although these do not appear to be part of a formal program.</p> </div> </div> <div> <div> <div></div> <div>Healthy food at work</div> </div> <div> <p>The company provided evidence that it supplies office workers in Kenya with food through local canteens, some of which can be considered ‘healthy’.</p> </div> </div> <div> <div> <div></div> <div>Nutrition education</div> </div> <div> <p>The company provided evidence that nutrition-related talks are available for office employees in Kenya.</p> </div> </div> <div> <div> <div></div> <div>Breastfeeding support</div> </div> <div> <p>The company showed evidence of its policy for the East and South Africa region which provides lactating mothers with one hour per day to breastfeed and that its breastfeeding facilities include a refrigerator to store breastmilk, which is in line with local Kenyan regulations. Additionally, the policy provides 16 weeks of maternity leave and 12 weeks of paternity leave to its employees, which goes beyond Kenyan regulation.</p> </div> </div>	<div> <div> <div></div> <div>Workforce nutrition program</div> </div> <div> <p>Flora FG is recommended to develop a comprehensive workforce nutrition program which is available to all employees (including at manufacturing sites) in Kenya, which includes healthy food at work, nutrition education, nutrition-focused health checks, and breastfeeding support. Engaging with the Workforce Nutrition Alliance (WNA) and utilizing its self-assessment scorecards would be a good first step in this regard.</p> </div> </div> <div> <div> <div></div> <div>Healthy food at work</div> </div> <div> <p>The company is encouraged to increase employees’ access to healthy food at work by ensuring that meals provided in canteens include nutrition criteria and are revised by an independent nutrition professional.</p> </div> </div> <div> <div> <div></div> <div>Nutrition education</div> </div> <div> <p>The company is recommended to increase employees’ knowledge of healthy nutrition by providing education materials selected and revised by an independent nutrition professional.</p> </div> </div> <div> <div> <div></div> <div>Nutrition-focused health checks</div> </div> <div> <p>The company is recommended to offer employees periodic, one-to-one meetings with a health or nutrition professional to assess the employee’s nutritional health.</p> </div> </div> <div> <div> <div></div> <div>Breastfeeding support</div> </div> <div> <p>The company is encouraged to offer paid maternity leave of at least six months (as recommended by the World Health Organization (WHO)). Additionally, the company is encouraged to provide breastfeeding facilities in the workplace, that include: 1) private, hygienic, safe rooms; 2) paid breaks to express breast milk; and 3) other flexible working arrangements to support breastfeeding mothers.</p> </div> </div> <div> <div> <div></div> <div>Reporting on implementation</div> </div> <div> <p>Flora FG is advised to set and publicly report against outcome-focused targets or key performance indicators (KPIs) to measure progress on implementing the workforce nutrition program in Kenya.</p> </div> </div>

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Findings	Recommendations
<div><div><div><div></div></div><div>Front-of-pack labelling</div></div><div>Flora FG has not yet published information on whether it will support and implement policy measures to improve consumers' awareness on healthy food choices in Kenya, including the proposed front-of-pack label.</div></div> <div><div><div><div></div></div><div>Health and nutrition claims</div></div><div>No information was found on whether Flora FG has committed to only place such claims on products that are defined as ‘healthier’ according to the formal nutrition criteria of an NPM.</div></div>	<div><div><div><div></div></div><div>Front-of-pack labelling</div></div><div>Flora FG is encouraged to support and implement policy measures to improve consumers’ awareness on healthy food choices in Kenya, including the proposed front-of-pack label.</div></div> <div><div><div><div></div></div><div>Health and nutrition claims</div></div><div>The company is recommended to expand its current nutrition labelling policy to include a commitment to refrain from using nutrition or health claims on products that are not considered ‘healthier’ according to the formal nutrition criteria of an NPM.</div></div>

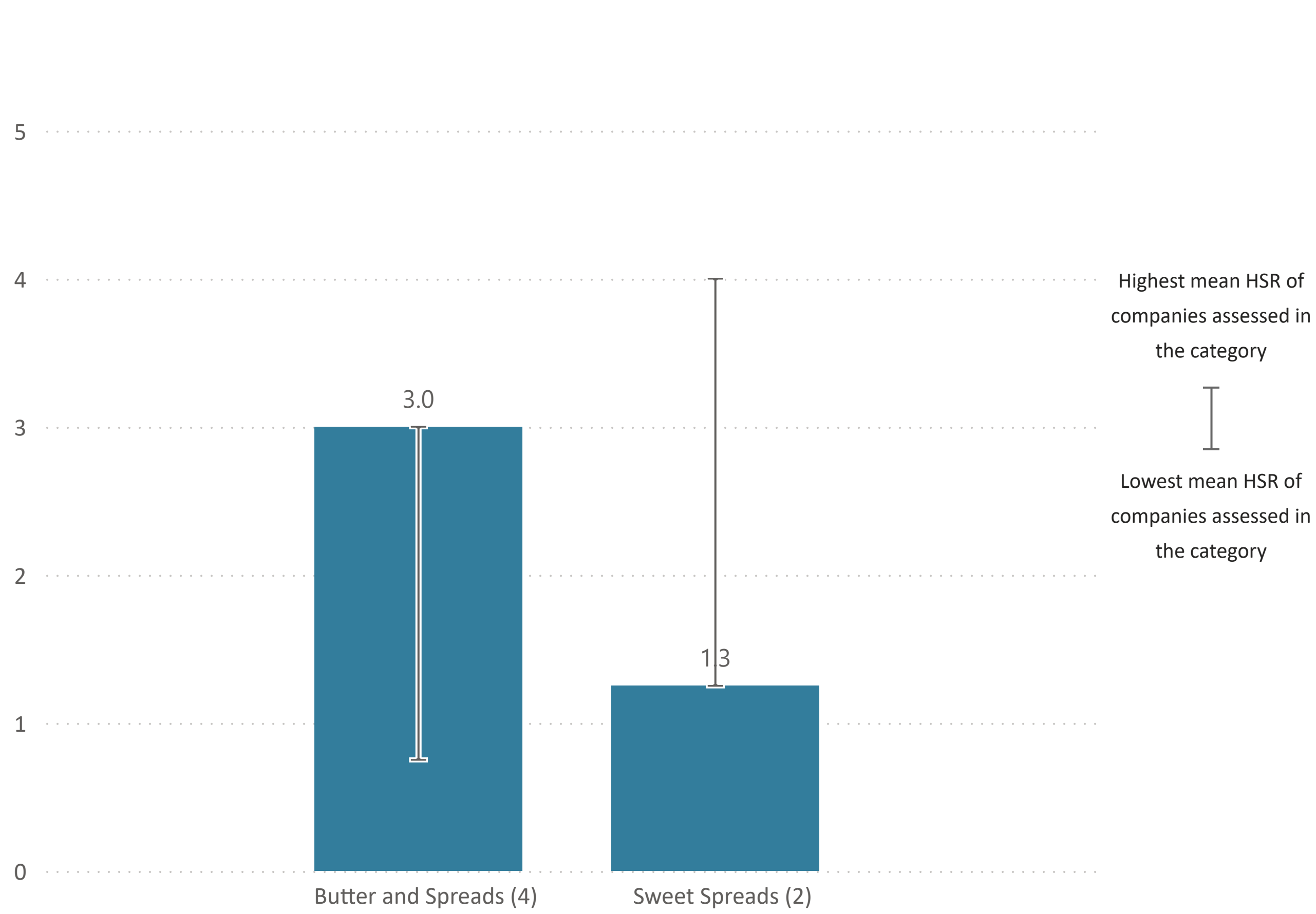
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The Product Profile for EAMA Kenya provides a structured evaluation of the nutritional composition of packaged food and beverage products from major manufacturers. It employs a range of internationally recognized nutrient profiling models to assess product characteristics, including the Australasian Health Star Rating (HSR) and a modified version of HSR including micronutrients (mHSR+ micronutrients), the World Health Organization Regional Office for Africa (WHO-AFRO) model, and the Kenyan Nutrient Profiling Model (KNPM). These models support a consistent and comparative analysis of portfolio healthiness across the market.

Proportion of "healthier" products, or products passing the model's criteria, per NPM

Category	% healthier products: HSR	% healthier products: mHSR+ micronutrient	% products passing KNPM	% products meeting WHO AFRO eligibility criteria
Butter and Spreads	25% (1/4)	25% (1/4)	50% (2/4)	0% (0/4)
Sweet Spreads	0% (0/2)	0% (0/2)	50% (1/2)	0% (0/2)

Mean HSR by category



This table presents an overview of the nutritional quality of products across various food categories, based on four different nutrient profiling models. Each row corresponds to a specific food category, and the percentages reflect the share of products in that category meeting the respective model’s criteria. The figures in parentheses indicate the number of products meeting the criteria over the total assessed. Blank cells indicate that data was not available or not applicable for that category and model.