

Product Profile Results/ Overall analysis

Highlands's Specifications

Regional Headquarter Global Headquarter

Kenya N/A

Market Share Range¹

0% - 5%

Type of Ownership

Private (primary owners: Joachim Westerveld, Padia family)

Categories assessed in Product Profile

Bottled Water, Carbonates, Concentrates, Energy Drinks, Juice

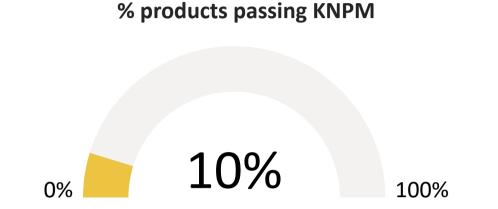
Important - The findings of this Index rely to a large extent on the information shared by companies, in addition to what is found in the public domain. In the case of limited, to no engagement by the companies, this assessment may not represent the full extent of their efforts.

Footnote:

1. Euromonitor International, Staple Foods Industry edition, 2022

Overall Product Profile Results

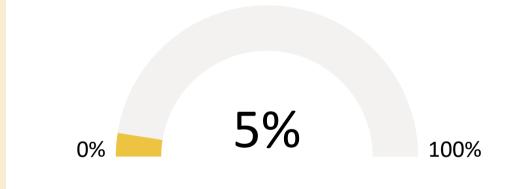
The results below show the percentage of "healthier" products, or products passing the model's criteria, for the company's overall portfolio, as assessed by different nutrient profiling models.



Out of **21** products assessed across all ATNi applicable categories, 10% pass **the Kenyan Nutrient Profiling Model**.

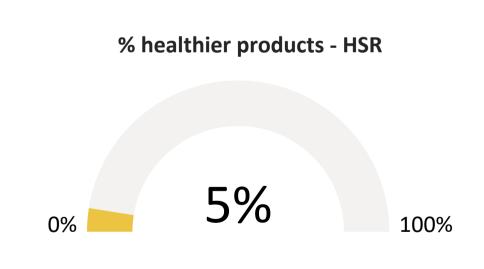
The **Kenyan Nutrient Profile Model** was developed to underpin front of package labelling requirements in Kenya. It sets thresholds for total fat, saturated fat, total sugars, and sodium across 21 categories of processed foods.

% products meeting WHO AFRO eligibility criteria



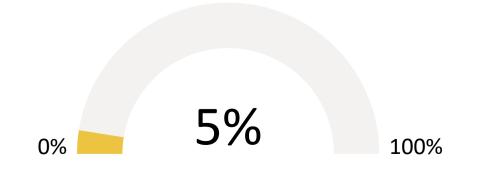
Out of **20** products assessed across all ATNi applicable categories, 5% meet the **WHO AFRO** eligibility criteria for marketing to children.

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'.



Out of **20** products assessed across all ATNi applicable categories, 5% 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 **20** products assessed across all ATNi applicable categories, 5% 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.



Category A: Nutrition Governance*

Recommendations **Findings** Nutrition strategy Nutrition strategy Highlands is recommended to assess how it can improve the impact of its commercial activities on No information was found in the public domain indicating that the company has a strategy to improve the nutritional impact of its products or commercial operations. public health and publish a clear commercial strategy to contribute to healthier and more nutritious diets in Kenya. Oversight and accountability **Healthy sales target and reporting** No information was found regarding the governance of Highlands' nutrition-related activities, such as Board review and executive accountability. The company is encouraged to develop and publish a specific, measurable, and timebound target to increase sales of products that meet a definition of 'healthier' in Kenya, and report on the percentage of its sales derived from such products. Ideally, the company would use a governmentendorsed NPM such as the Kenya NPM for this purpose. Strategy reporting The company could consider publicly reporting on the implementation of each aspect of its strategy, showing annual progress on meeting set targets (including those outlined in subsequent categories). Reporting should ideally take the form of quantitative metrics, documented in a systematic manner. Board oversight To ensure that the nutrition strategy is prioritized and implemented systematically across the company's operations, the company is recommended to have its Board of Directors review progress against the strategy on at least an annual basis. **Executive accountability and remuneration** The company is also encouraged to assign formal responsibility for the implementation and success of the nutrition strategy to the CEO, or another senior-level executive, and ideally linking their executive remuneration to at least one of the nutrition strategy's targets or metrics.

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Category B2.1: Macronutrients and Food Components*

Findings Recommendations ☐ Targets for nutrients of concern ☐ Targets for nutrients of concern No information was found in the public domain that the company has made progress or put Highlands is encouraged to identify products or categories that are high in free/total sugars and targets in place to reduce levels of free/total sugars in its portfolio. Sodium, saturated fats publish a specific, measurable, and time-bound target for reducing levels of this nutrient across all and industrially produced trans fats (iTFAs) are not relevant to the company's portfolio. relevant product categories. **Targets for positive ingredients** Reporting progress Ingredients such as minimally processed fruits, vegetables, nuts, legumes and wholegrains The company is encouraged to publicly report on annual progress against reformulation targets using are not relevant to the company's portfolio. quantitative metrics.

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Category B2.2: Micronutrients and Fortification*

Findings Recommendations **Fortified products** □ Disclosure of micronutrient information Of the 21 products produced by Highlands that were identified for ATNi's Product Profile, 0 Highlands is recommended to specify in full the micronutrient content of its products on back-ofwere found to have micronutrient data available, however, 5 were found to have pack nutrition labels. The company is also advised to disclose levels of micronutrients in the final micronutrients listed in ingredient information, therefore were classified as fortified in this product, using standardized measurement units. assessment. These included concentrates (4 fortified products) and juice (1). Fortification policy Fortification policy Highlands is advised to develop and publish a fortification policy that includes explicit commitments Highlands was found to voluntarily fortify juice and concentrates products. No indication to follow the CODEX CAC/GL 9-1987 and/or the WHO/FAO 'Guidelines on Food Fortification with that the company has a policy to only fortify products that meet 'healthy' criteria was found Micronutrients' as per standards set out by the Kenyan government, and to only fortify products that meet the nutrition criteria of an NPM or when required by law. in the public domain. Quality and control The company is encouraged to publish its quality control or assurance methods to determine whether the levels of micronutrient(s) are sufficient in the final product.

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Category B3: Reporting on Healthiness*

Findings Recommendations **Nutrient profiling ☐** Reporting on portfolio healthiness No information was found in the public domain indicating that the company uses a The company is encouraged to measure and publicly report the percentage of its sales which are nutrient profiling model (NPM) to define and report on the healthiness of its product derived from products classified as 'healthier' according to a government-endorsed NPM. portfolio. ☐ Transparency of NPM application 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.

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Category C: Affordable Nutrition*

Findings Recommendations Affordable nutrition strategy □ Relative affordability No information was found in the public domain on whether the company has a strategy to The company could consider measuring the price differential between 'low/no sugar' products improve the affordability of its 'healthy' products. relative to its 'full sugar' products and setting a target to improve the price differential, such that 'healthier' options are relatively more affordable than 'less healthy' products. Reporting progress Highlands is recommended to report on quantitative progress on improving the price differential between 'low/no sugar' and 'full sugar' products across the whole portfolio, rather than only for select examples.

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Category D: Responsible Marketing*

Findings Recommendations Responsible marketing to children Responsible marketing to children No information on whether Highlands has committed Highlands is encouraged to adopt and publish a responsible marketing policy to ensure that it does not market 'less healthy' products to to market its products responsibly to children in Kenya children in Kenya. was found in the public domain. **Product restrictions for marketing to children** Ideally, the company's responsible marketing to children policy would include a commitment not market products to children at all, or only those products meeting the criteria of a government-endorsed/internationally recognized NPM such as the Kenya NPM or the World Health Organization (WHO) NPM for the Africa Region. Age threshold A 'child' should be defined as those up to the age of 18, as per the Kenya Information and Communications (Broadcasting) Regulations, 2009. Marketing policy scope Highlands is recommended to explicitly apply its responsible marketing policy to a comprehensive range of media channels and techniques identified in the WHO Guidelines on this topic. These include all digital, broadcast and print media (e.g. TV, radio, and newspapers, paid ads on third-party websites, social media and apps), and techniques such as celebrity endorsements, sponsorships, and toys, premiums, vouchers, and giveaways that appeal to children under 18. **Audience threshold** Highlands is encouraged to apply an audience threshold of >25% on measured media to determine whether a channel is considered 'childdirected'. Auditing compliance The company could consider commissioning an independent third-party audit of the company's responsible marketing commitments in Kenya, covering a wide range of media channels and marketing techniques, and publish the results. Highlands is recommended to explicitly state that it adheres to the ICC Framework for Responsible Food & Beverage Marketing Communications in its responsible marketing policy.

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Category E: Workforce Nutrition*

Findings Recommendations Workforce nutrition program **Workforce nutrition program** No information was found in the public domain on whether the company Highlands is recommended to develop a comprehensive workforce nutrition program which is available to all offers healthy food at work, nutrition education, nutrition-focused health employees (including at manufacturing sites) in Kenya, which includes healthy food at work, nutrition education, checks, and breastfeeding support for its employees, nor paid primary or nutrition-focused health checks, and breastfeeding support. Engaging with the Workforce Nutrition Alliance (WNA) secondary caregiver leave beyond local legal requirements. and utilizing its self-assessment scorecards would be a good first step in this regard. Healthy food at work The company is encouraged to increase employees' access to healthy and safe foods at work through direct provision, food subsidies, or by increasing the availability of healthy food options. These food options should include nutrition criteria and be revised by an independent nutrition professional. **Nutrition education** The company is recommended to increase employees' knowledge of healthy nutrition by providing education materials selected and revised by an independent nutrition professional. **Nutrition-focused health checks** 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. **Breastfeeding support** The company is encouraged to offer paid maternity leave of at least six months (as recommended by the World Health Organization (WHO)) and paid secondary caregiver leave beyond legal requirements. The company can further support breastfeeding mothers in its workforce by providing breastfeeding facilities in the workplace, that include: 1) private, hygienic, safe rooms to express breastmilk; 2) paid breaks to express breastmilk; 3) refrigerators to store breastmilk; and 4) other flexible working arrangements to support breastfeeding mothers. **Reporting on implementation** The company is also encouraged to set and publicly report against outcome-focused targets or key performance indicators (KPIs) to measure progress on implementing the workforce nutrition program.

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Category F: Responsible Labelling*

Findings Recommendations Front-of-pack labelling **☐** Front-of-pack labelling Highlands has not yet published information on whether it will support and implement Highlands is encouraged to support and implement policy measures to improve consumers' policy measures to improve consumers' awareness on healthy food choices, including the awareness on healthy food choices, including the proposed front-of-pack label. proposed front-of-pack label in Kenya. **Health and nutrition claims** The company is advised to commit to refrain from using nutrition or health claims on products that No information was found in the public domain on whether Highlands has committed only to are not considered 'healthier' according to the formal nutrition criteria of an NPM, such as the place health and nutrition claims on products that are defined as 'healthier' according to the Kenya NPM. formal nutrition criteria of an NPM.

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Product Profile Results

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
Bottled Water	100% (1/1)	100% (1/1)	100% (1/1)	100% (1/1)
Carbonates	0% (0/12)	0% (0/12)	0% (0/12)	0% (0/12)
Concentrates	0% (0/5)	0% (0/5)	0% (0/6)	0% (0/5)
Energy Drinks	0% (0/1)	0% (0/1)	100% (1/1)	0% (0/1)
Juice	0% (0/1)	0% (0/1)	0% (0/1)	0% (0/1)

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.

Mean HSR by category

