

Overall analysis/ Product Profile Results

PT Sumber Alfaria Trijaya, Tbk's Retailer Profile

Headquarters **Operating Brands** Alfamart, Alfa Midi Indonesia

Market Share (Formal Retail Market)¹ **Geographic Coverage** 38-40% Nationwide

Primary Retail Format Type of Ownership Public **Convenience Stores**

Primary Consumer Segment Operation Model

Franchise or equivalent / Decentralized Mass market

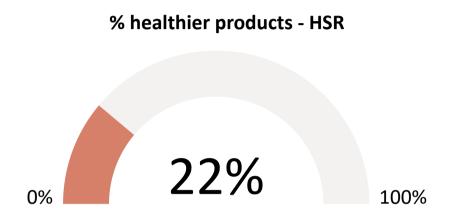
Important - The findings of this Assessment regarding retailers' performance rely to a large extent on information shared by retailers, in addition to information that is available in the public domain. Several factors beyond the retailers' control may impact the availability of information. Therefore, in the case of limited or no engagement by such retailers, this Assessment may not represent the full extent of their efforts.

Footnote:

1. Euromonitor International, Staple Foods Industry edition, 2024

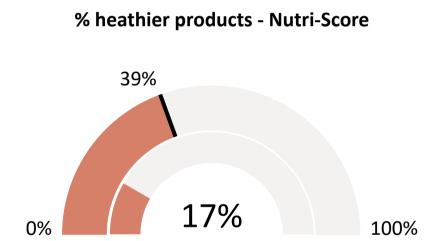
Overall Product Profile Results

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



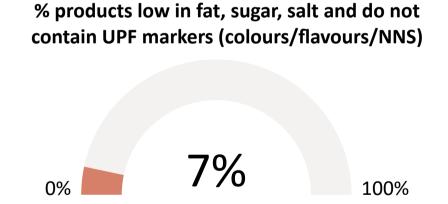
Of 18 private label products assessed across all applicable categories, 22% are considered healthier based on the **HSR model** and healthier threshold of 3.5 stars or above.

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.



Of 18 private label products assessed across all applicable categories, 17% are considered healthier based on the **Nutri-Score** grades of A + B (represented by the inner arch of the graph). When extending the definition to include grade C (A + B + C), 39% of private label products are considered healthier (outer arch), allowing flexibility depending on the context and purpose of comparison.

The **Nutri-Score model** was also used to assess the proportion of products in each retailer's portfolio that receive each of the five categories: from category A (dark green), indicating higher nutritional quality, to category E (dark orange), indicating lower nutritional quality.



Of 15 private label products assessed across all applicable categories, 7% are non-HFSS (so not High in Fat, Salt and Sugar) and non-UPF (no colours/flavours/NNS as markers of Ultra-Processed Food) products. The HFSS + colours/flavours/NNS approach (Popkin et al. 2024) combines HFSS (high in fat, sugar, and salt) thresholds with common UPF markers (in this case: colours, flavours, and non-nutritive sweeteners) to flag less healthy food and beverage items.



Of 32 private label products assessed across all applicable categories, 9% meet the WHO SEARO eligibility criteria for marketing to children.

South-East Asia Region when developing policies to restrict food marketing to children.

The WHO SEARO model is a nutrient profile model for use and adaptation by Member States of the WHO



Topic A: Nutrition Prioritization

Recommendations **Findings Recognition of nutrition** Recognition of nutrition While the company has undertaken a materiality assessment, this did not Sumber Alfaria Trijaya (Alfamart) is encouraged to explicitly recognize consumer health <u>Link</u> identify nutrition (or similar themes) as a material risk for the company. and nutrition as an important material issue within its materiality assessment. The Similarly, no nutrition-related risks were identified in the company's enterprise company is also encouraged to identify and disclose nutrition-related risks in the enterprise risk register reported in its Annual Report and Sustainability Reports, risk register. including potential business impacts of changing consumer preferences and health Addressing & prioritizing nutrition consciousness, reputational risks, and possible future regulatory requirements. By No evidence of a strategy or approach to improving nutrition outcomes for its proactively engaging on nutrition and health, Alfamart can strengthen long-term consumers was identified in the company's public reporting. resilience, trust, and competitiveness. Addressing & prioritizing nutrition To play an active role in addressing and preventing rising rates of overweight and obesity in Indonesia, Alfamart is strongly encouraged to integrate nutrition considerations across its commercial business and develop a comprehensive strategy to improve its impact on consumer health, in line with ATNi's recommendations from this Retail Assessment. This should include clear objectives and defined actions. This would help the company meet growing expectations from consumers, regulators, and investors, while differentiating itself from competitors and supporting long-term, sustainable growth. **Nutrition governance & accountability** Alfamart is recommended to assign direct responsibility for its nutrition strategy to a named executive, and to formally incentivize progress by linking their remuneration to at least one nutrition-related KPI. The company is also encouraged to ensure that its Board of Directors formally approves and regularly reviews progress on its nutrition strategy. Strong governance and accountability mechanisms embed nutrition into decision-making at the highest levels, driving consistent implementation and signalling to stakeholders that the company is serious about delivering on its commitments.

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Topic B: Portfolio Improvement

Findings

Nutrition targets and reporting

No evidence was found on the public domain of targets to increase sales of 'healthier' products or fruits and vegetables, nor of reporting on the proportion of sales derived from such products. Similarly, no targets or reporting were identified on reducing specific nutrients of concern or increasing positive ingredients in its private label portfolio.

Recommendations

Nutrition targets and reporting

Alfamart is strongly recommended to track the sales of products — starting with its private label portfolio — that meet a formal definition of 'healthier', such as those classified as Nutri-Level 'A' or carrying the 'Healthier Choice' logo. The results should be published annually, ideally according to ATNi's proposed NPM reporting guidelines. The company is also strongly encouraged to set an ambitious, timebound target to increase the proportion of total food sales derived from products meeting this definition. Setting targets and transparently reporting in this way not only helps to focus internal efforts, but also builds stakeholder trust by demonstrating accountability and a commitment to promoting healthier consumer choices.

Defining 'healthier' products

Alfamart is strongly recommended to adopt a government-endorsed NPM to define 'healthier' products within its portfolio, such as Nutri-Level 'A/B' or the 'Healthier Choice' criteria. It can use this 'healthier' definition to guide decisions on stocking, pricing, positioning, promotion, marketing and labelling of products, as well as to develop new healthy products and reformulate existing products to improve their healthiness.



Topic C: Pricing & Promotions

Recommendations Findings Affordability of healthier products **Affordability of healthier products** Alfamart states that it is "committed to maintaining the availability of basic Building on its overall commitment to affordability, Alfamart is encouraged to develop <u>Link</u> necessities at affordable prices", and that its 'House Brand & Private Label a dedicated strategy to increase the affordability of 'healthier' products specifically, ("HBPL") is part of its affordability efforts. No public evidence was found of a ensuring that these are priced more competitively relative to less healthy options. This commitment or strategy to ensure, or increase, the affordability specifically of should include defining how affordability will be measured in Indonesia, and targets to 'healthier' products in its stores. increase the availability and affordability of 'healthier' products. Especially given the company's extensive reach in Indonesia, the company is encouraged to develop a **Price promotions & loyalty rewards** strategy to improve the accessibility of affordable, healthy products for lower-income No evidence of a policy or initiative to offer proportionately more price consumers. promotions on healthier products was found, nor any loyalty mechanisms to **Price promotions & loyalty rewards** incentivize the purchasing of healthier products specifically. Alfamart is encouraged to leverage its loyalty rewards program to actively incentivize the purchase of 'healthier' products, ideally through ongoing or permanent mechanisms. The company is also encouraged to develop a program or policy to ensure that a greater share of price promotions are applied to 'healthier' products throughout the year, or to reduce promotions on less healthy products. The company could also consider tracking and publicly reporting quantitative data on these initiatives to demonstrate their reach and impact.



Topic D: Responsible Marketing

Findings Recommendations In-store marketing techniques In-store marketing techniques No evidence was found in the public domain of policies or Alfamart is encouraged to develop initiatives to increase the proportion of healthier products that are initiatives addressing the in-store positioning of healthier versus prominently displayed in high-traffic areas of stores, such as end-of-aisle displays, checkout zones, and store entrances, relative to less healthy products. Ideally, these efforts would be complemented by unhealthy products, such as in prominent in-store locations, improving shelf-space ratios, or using promotional techniques similar practices in online retail environments, ensuring that healthier options are prominently featured (beyond pricing) to encourage sales of healthier products and/or in digital promotions, search results, and recommendations. fruits and vegetables. Responsible marketing to children Responsible marketing to children Alfamart is strongly encouraged establish a formal policy to not market products that do not meet a No evidence of a policy in place to restrict the marketing of formal definition of 'healthy', ideally based on a government-endorsed NPM or the WHO South-East Asia Regional Model, to children under the age 18, in line with WHO and UNICEF recommendations. unhealthy products to children was found on the public domain. This commitment should apply to all products, including treats and seasonal products, and across all marketing channels and techniques, including in-store promotion, digital media, and sponsorships, Responsible marketing of breastmilk substitutes (BMS) and while being transparent about any exemptions. The company is also encouraged to commission complimentary foods (CF) independent third-party audits of this policy on an annual basis, and to publish the results to No evidence of a policy for the responsible marketing of BMS or demonstrate transparency and accountability. CF was found on the public domain. Responsible marketing of breastmilk substitutes (BMS) and complimentary foods (CF) Alfamart is encouraged to develop and publicly disclose a policy on the responsible marketing of BMS and CF, fully aligned with the WHO International Code of Marketing of Breastmilk Substitutes and subsequent relevant World Health Assembly (WHA) resolutions. This policy should clearly outline the company's commitments, scope of application, and mechanisms for monitoring and enforcement across all markets and subsidiaries.



Topic E: Responsible Labelling

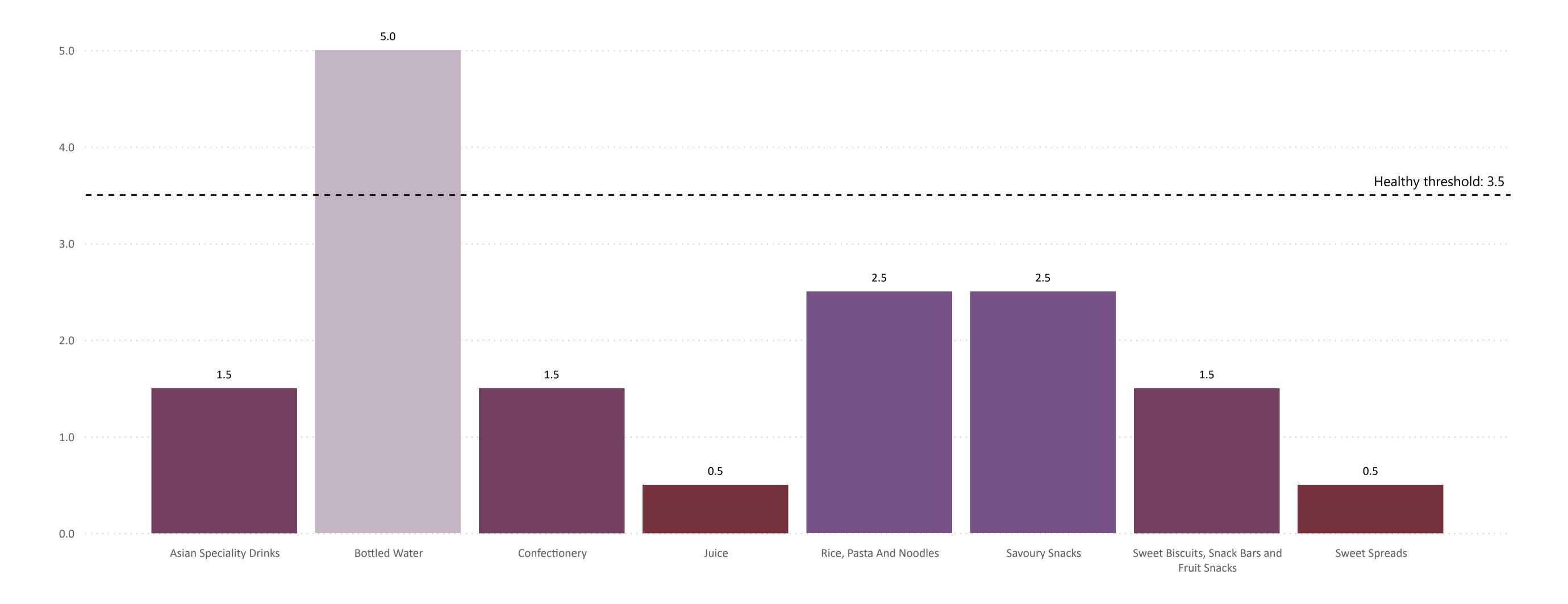
Recommendations **Findings Identifying healthier products** Identifying healthier products No evidence of a company initiative currently in place to assist consumers in Alfamart is encouraged to actively comply with BPOM's Nutri-Level regulation ahead identifying 'healthier' or 'unhealthy' products as they are displayed, either inof the 2027 deadline. store or online, was found. Indonesia's National Agency of Drug and Food Control (BPOM) has drafted a regulation to mandate an interpretive front-of-Responsible use of health and nutrition claims pack labelling (FOPL) system, the Nutri-Level, which focuses on sugar, salt, and Alfamart is encouraged to publicly commit to following Codex Alimentarius Guidelines fat content, but this has not yet come into force. on the use of health and nutrition claims on its private label products, and to only Responsible use of health and nutrition claims place claims on products classified as 'healthier' according to the proposed Nutri-Level. No evidence was found of a policy to follow Codex Guidelines on the use of health and nutrition claims on its products, or to restrict such claims to products classified as 'healthier' according to an NPM.



Private Label Product Profile Results

The Product Profile for Retail Assessment provides a structured evaluation of the nutritional composition of private label packaged food and beverage products from selected retailers. It employs a range of internationally recognized nutrient profiling models to assess product characteristics, including the Australasian Health Star Rating (HSR), the Nutri-Score model, and the HFSS + colours/flavours/NNS approach (Popkin et al. 2024). These models support a consistent and comparative analysis of portfolio healthiness across the retailers. Graph below indicates mean HSR of each categories assessed for Alfamart.

Mean HSR by category





Private Label Product Profile Results

The table presents an overview of the nutritional quality of products across various food categories, based on HSR, Nutri-Score (A+B and A+B+C) and the HFSS + colours/flavours/NNS approach (Popkin et al. 2024). 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.

Category	% healthier products: HSR	% healthier products: Nutri-Score (A+B)	% healthier products: Nutri-Score (A+B+C)	% products that are HFSS	% products that are HFSS AND/OR contain UPF markers (colours/flavours/NNS)	% products meeting WHO SEARO eligibility criteria	% products meeting WHO WPRO 1 eligibility criteria
Asian Speciality Drinks	0% (0/1)	0% (0/1)	100% (1/1)	0% (0/1)	0% (0/1)	100% (1/1)	0% (0/1)
Bottled Water	100% (2/2)	100% (2/2)	100% (2/2)			100% (2/2)	100% (2/2)
Confectionery	0% (0/1)	0% (0/1)	0% (0/1)	100% (1/1)	100% (1/1)	0% (0/1)	0% (0/1)
Juice	0% (0/3)	0% (0/3)	0% (0/3)	100% (2/2)	100% (2/2)	0% (0/3)	0% (0/3)
Ready Meals						0% (0/1)	0% (0/1)
Rice, Pasta And Noodles	0% (0/1)	0% (0/1)	100% (1/1)	100% (1/1)	100% (1/1)	0% (0/1)	100% (1/1)
Savoury Snacks	25% (2/8)	13% (1/8)	38% (3/8)	100% (8/8)	100% (8/8)	0% (0/21)	0% (0/19)
Sweet Biscuits, Snack Bars and Fruit Snacks	0% (0/1)	0% (0/1)	0% (0/1)	100% (1/1)	100% (1/1)	0% (0/1)	0% (0/1)
Sweet Spreads	0% (0/1)	0% (0/1)	0% (0/1)	0% (0/1)	100% (1/1)	0% (0/1)	0% (0/1)
Total	22% (4/18)	17% (3/18)	39% (7/18)	87% (13/15)	93% (14/15)	9% (3/32)	10% (3/30)

Footnote:

1. The WHO WPRO model is a nutrient profile model for use and adaptation by Member States of the WHO Western-Pacific Region when developing policies to restrict food marketing to children.