

Danone

Headquarters
France

Type of ownership
Public

Estimated percentage of Danone's global
F&B sales from CF ¹ ¹
3%

Estimated percentage of Danone's global
baby food sales from CF ² ²
15%

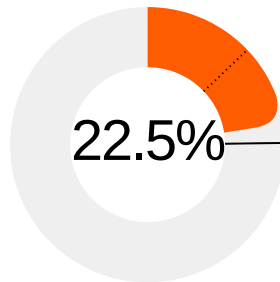
Countries covered in country studies
China/Germany/US

Company also assessed in:



BMS Index 2024

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CF Marketing
Score 2024 ³

Average score
Highest score



Country Studies
Score ⁴

44% 3 countries



Corporate Profile
Score

1%

Important:

The research findings regarding companies' performance in this Index are based on information shared by companies or gathered by service providers, in addition to information that is available in the public domain.

The level of detail and comprehensiveness of information shared by companies and gathered through external service providers varied. In the case of limited or no engagement by companies, this Index may not represent the full extent of their efforts. Similarly, in the case of limited data collected by service providers, the findings of this Index may not provide a comprehensive representation of company practices.

ATNI's research and Indexes do not assess compliance with local regulations or laws, but rather assess private sector performance against international standards and guidance.

CF COUNTRY STUDIES



Country Studies
Score

44% 3 countries

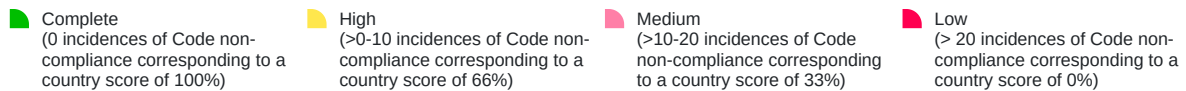
The Country Studies component of the BMS and CF Marketing Indexes 2024 evaluates the extent to which a company's marketing practices align with specific provisions of the WHO Code (not against local Code-related regulations). The main marketing channels assessed in the Country Studies for the BMS and CF Marketing Indexes 2024 are online points-of-sale, traditional and online media outlets, and product labels which were all assessed according to the NetCode protocol. Danone sells CF products in three countries (China, Germany and the US) of the five countries selected for the assessment, which altogether represent around 14% of Danone's estimated global CF sales. The Country Studies results for Danone are summarized below for each country and across each marketing channel.

<https://new-l40rlzsq.accessnutrition.org/app/uploads/2024/03/Assessment-methods-and-scoring.pdf>

Country Studies overview

Danone	Country assessments			CF market ^{i 5}	
	Total incidences of non-compliance across online, traditional media, and product labels ^{i 6}	Number of product labels assessed ^{i 7}	Company brands found	CF market share	Proportion of Danone's global CF sales
CHINA	9	5	Aptamil, Neocate	<5%	No information available
GERMANY	13	6	Milupa	12%	6%
INDONESIA	N/A	N/A	N/A	N/A	N/A
US	17	15	Happy Baby, Happy Tot	<5%	7%
VIET NAM	N/A	N/A	N/A	N/A	N/A

Code compliance level



• A total of 39 incidences of non-compliant marketing practices for CF products were found for Danone. Non-compliant marketing practices were found across online media channels assessed in the three countries and a total of 26 CF product labels were assessed from various Danone brands.

• In China, Danone has a relatively small market share (<5%). A total of nine non-compliance incidences were found, which included four advertisements or promotions on online media channels and all five product labels assessed contained one or more instances of non-compliance.

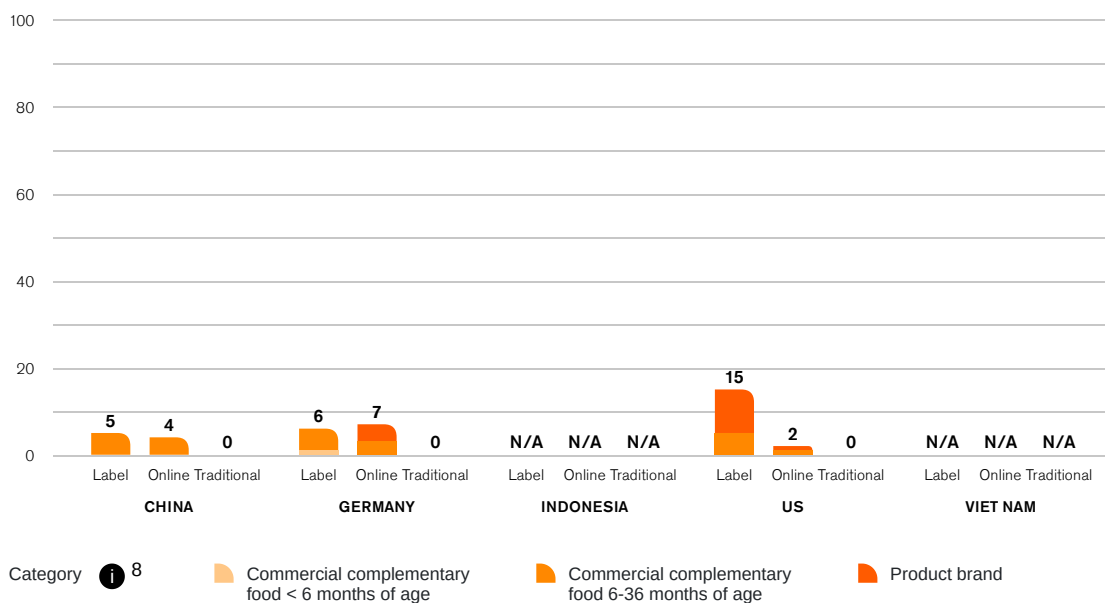
• In Germany, where Danone's CF sales represent

~6% of the company's global CF sales and has around 12% of the market share, a total of 13 non-compliance incidences were identified, which included seven advertisements or promotions on online media channels and all six product labels assessed contained one or more instances of non-compliance.

• The highest number of incidences of non-compliance were found (17) in the US, where Danone has a small market share of the US CF market (<5%) and which represents approximately 7% of the company's total global US sales. Only two advertisements or promotions on online media channels were found and all 15 product labels assessed contained one or more instances of non-compliance.

Observed incidences of non-compliance with the Code per country

Absolute number of incidences of non-compliance



Main in-country findings

The highest number of incidences of non-compliance for Danone were found in the US (17), followed by Germany (13) and China (9).

Across all country assessments, the majority of incidences of non-compliant marketing practices observed (39) for Danone were for inappropriate CF product labels (26). A total of 13 incidences of non-compliance were identified through the social listening of online platforms. On traditional media, no incidences of non-compliance were found in the eight weeks the channels were monitored.

One commercial complementary food product explicitly intended for infants below six months of age was found in Germany in this assessment. According to the WHO, this product should not be available on the market and was counted as a non-compliant label. Fifteen incidences observed belonged to CF products that had no clear age range specified of which the majority (11 out of 15) were found in the US.

The other commercial complementary foods found (23) during ATNI's assessment were clearly marketed as suitable for older infants and young children between six months up to three years of age.

Online findings

- Among the total incidences of non-compliance found online (13), there were no observations identified for non-compliant point-of-sale promotions on online retail channels in the eight weeks the channels were monitored.
- The 13 incidences of non-compliance were found on the company's local websites and social media platforms, with the highest number of findings in Germany (7), followed by China (4), and the US (2).
- Across the three countries where online advertisements of Danone's CF products were found, an average of three to five incidences of non-compliance were identified with each observation. All

the advertisements were missing the statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. In China none of Danone's CF products found promoted online had a clear recommended age of introduction, some advertisements in Germany and the US were also missing this (43% and 50% respectively).

- Other incidences of non-compliance found with the advertisements included sign-up to online contests, registering to baby clubs and expert chats, the promotion of bottle feeding in Germany and endorsements by registered dietitians and experts in the US.

- The majority of the online advertisements found also included claims, ranging from 50% of the identified advertisements in China, to 100% in the US.

CF product label

- The total number of Danone CF products assessed were 26, five in China, 15 in the US and six in Germany.
- One CF product in Germany was found to be marketed as suitable for infants under six months of age, this product was not assessed as it should not be available on the market according to the WHO. Therefore, the following results are for CF 6-36 months and those with no clear age indicated.
- For all Danone product labels assessed, at least one incident of Code non-compliance was observed. The average number of incidences of non-compliance per product label assessed ranged from two in China to four in the US.
- Across the three markets, all Danone CF labels assessed had at least one type of claim and none included a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond.
- Germany was the only country where Danone CF

products did not have all the labelling information in the local language for five products; information on the labels was written in English instead. Another key observation classified as non-compliant with the Code was identified on the CF product labels assessed for Danone in the US where 10 of the 15 products assessed did not include a clear recommended age for introducing the product to older infants and young children.

- Of all products, 12 included an image, text, or other representation that may suggest that the product is inherently superior to home-prepared foods. Another incidence of non-compliance was found in the US, by containing an endorsement by a professional, in this case by mentioning pediatricians and nutritionists, certification or government inspection on 11 labels.
- It is worth noting that ATNI did not have the resources to collect products from the different markets and take pictures of its labels. For this assessment ATNI used product label images from an external provider. For some products, images were not clear enough or did not show all parts of the package, in these cases ATNI asked the respective companies to provide images of the labels. Danone provided images of product labels (as requested by ATNI) to help complete the assessments for all products.

Recommendations

- Given the incidences of non-compliant marketing practices for CF products observed, Danone is recommended to ensure that CF products are appropriately promoted in line with the 2016 WHO Guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9.
- The WHA 69.9 supported guidance includes recommendations around which messages should be present on CF labels to support optimal infant and young child feeding, and which are inappropriate and could undermine recommended practices. Danone should incorporate these recommendations in its policies and practices and apply them to its CF products, as none of the CF products in this assessment fully met these requirements. The company should aim to address missing statements on exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond and ensure that product labels in each market (especially in Germany) are appropriately translated into local languages.

- Danone is encouraged to consider the recommendations of the Code and WHA 69.9 supported guidance to appropriately advertise and promote CF products and brands intended for older infants and young children between six months and three years of age on all forms of media platforms globally. The company should also refrain from including endorsements by professionals like pediatricians and nutritionists.
- Danone is strongly encouraged to take responsibility for monitoring its marketing practices beyond local regulations, according to the principles and the aim of the Code and subsequent relevant resolutions, and to take steps to ensure this includes online media channels.
- ATNI is calling on Danone to review all incidences of non-compliance identified across all marketing channels, which were shared in detail with the company, and to take corrective action in each of the markets.

CF CORPORATE PROFILE



Corporate Profile
Score

1%

The Corporate Profile component of the BMS and CF Marketing Indexes 2024 evaluates the extent to which a company's policies align with various provisions of the Code, the effectiveness of its related management systems as well as the company's level of disclosure on commitments relating to CF marketing. Danone's CF marketing commitments were assessed across nine topics that cover different aspects of the Code yielding an average score that is equivalent to the company's initial overall Corporate Profile score before a geographic penalty (if applicable) is applied. However, the assessment on one of the indicators in the first topic on "Guiding Principles of Infant and Young Child Feeding" determines whether a company receives the full initial overall Corporate Profile score or only half of it. A company that is found to market CF for infants under six months of age only gets half of the initial overall Corporate Profile score. As described in the findings on the topic "Guiding Principles of Infant and Young Child Feeding" below, Danone was found to market CF products for infants under six months of age, therefore its initial overall Corporate Profile score was halved from 20% to 10%. The final Corporate Profile score considers how the company's marketing commitments are applied across different markets for CF products intended for older infants and young children between six months and up to three years of age (CF 6-36 months). The next section 'Geographic application of CF commitments by product type' shows how the company's application of commitments for CF 6-36 months was evaluated. The scores and findings on each topic are described in further detail in the section below on 'CF Commitments by Topic'.

Geographic application by Danone of CF commitments by product type

The percentage of product sales where commitments are upheld, and the geographic penalty applied to CF products intended for older infants and young children aged six months up to three years. The penalty ranges from 0% up to 90% depending on whether a company fully upholds its CF marketing commitments in all or none of the countries in which it operates, respectively, where national Code regulations are absent or less stringent than the company's policies and standards.

Corporate Profile score before penalty ^{i 9}	Product type	Percentage of Danone's global sales from markets where CF commitments are upheld ^{i 10}	Geographic penalty applied	Final Corporate Profile score
10.1%	Commercial complementary foods 6-36 months ^{i 11}	0%	90%	1%

Commitments are upheld

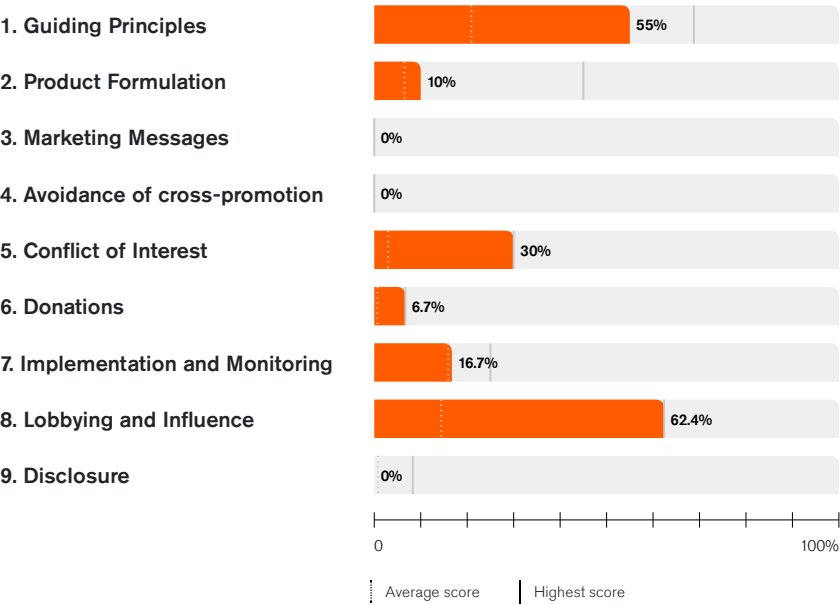
-  Upheld for all products in this category - without exception - globally
-  Upheld for some products in this category - without exception - globally
-  Upheld for all products in this category - without exception - only in some markets
-  Upheld for some products in this category, and only in some markets
-  Not upheld for this product category in any market
-  No policy found in the public domain nor shared by the company, therefore no information on how commitments are upheld

Commercial Complementary Foods

• No information was found in the public domain nor shared by the company describing if and where (in what markets) marketing commitments are upheld for CF 6-36 products. Therefore, the corresponding geographic penalty is the maximum of 90% and the final Corporate Profile score is 1%.

ATNI calls on Danone to consider the expanded definition of the Code, following the World Health Assembly resolution 69.9 recommendations that cover and address the responsible marketing of commercially produced complementary foods intended for older infants and young children aged 6–36 months.

Topics Overview



These represent the initial overall scores before applying the penalty.

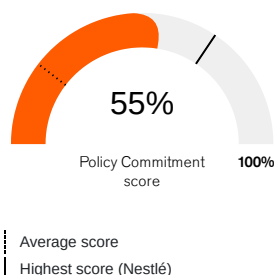


CF commitments by topic

Most topics include both policy commitments and management systems except for 'Guiding principles of infant and young child feeding' which only considers policy commitments, 'Implementation and Monitoring' which only considers management systems, and 'Disclosure' which only considers the level of disclosure of identified commitments. 'Lobbying and Policy Influence' is the only topic that includes policy commitments, management systems and disclosure.

1. Guiding Principles

This topic consists of policy commitment indicators only.



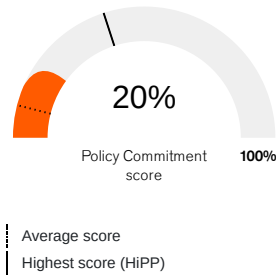
Policy Commitment

- Danone's 2018 Policy for the Marketing of Breast-milk Substitutes covers the marketing of complementary foods and drinks for infants younger than six months, but no commitments were found in this policy or in other documents that specifically cover complementary foods for older infants and young children between six months and three years of age. Based on this information, since the company markets CF products for infants under six months of age, it only gets half of the initial overall Corporate Profile score, as described in the section above.
- Based on Danone's 2018 Policy for the Marketing of Breast-milk Substitutes, the company's overarching commitments to the Code have not changed since the 2021 assessment. The company continues to clearly state its support for exclusive breastfeeding in the first six months and continued breastfeeding to two years or beyond, as well as for the introduction of appropriate complementary foods from the age of six months.
- Although when compared to the other companies assessed, Danone overarching commitments are relatively well-aligned with the principles of the Code, the company still does not fully acknowledge the specifications to the Code provided by the World Health Assembly (WHA) in resolution 69.9 and the accompanying guidance on ending the inappropriate promotion of foods for infants and young children. WHA resolution 71.9, which calls for continued implementation of the recommendations of this guidance has not been acknowledged by the company either. In addition, no explicit commitments were found from Danone to follow various WHO and UNICEF guidelines on optimal infant and young child feeding.
- Since no explicit commitments were found for Danone on the marketing of CF in line with the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9, the question on applying those commitments to the company's joint ventures and subsidiaries does not apply.

- Danone is urged to adopt WHO guidance relating to complementary feeding and uphold globally recognized public health guidelines, with a key requirement being to no longer produce and sell commercial complementary foods for infants aged under six months.

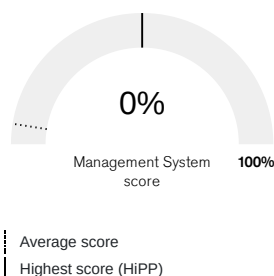
2. Product Formulation

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Policy Commitment

- Similar to the 2021 assessment, Danone did not score fully on this topic since only one explicit commitment was found relating to product formulation. The company shared its food safety policy under NDA which showed explicit commitments to manufacture foods for infants and young children according to one of the relevant Codex standards. No information was found indicating if the company adheres to other relevant Codex standards and guidelines at a minimum, nor if it follows any national, regional and global standards for composition, safety, quality and nutrient levels.
- Danone is encouraged to explicitly state which specific Codex standards and guidelines and other national, regional, and global standards it follows at a minimum for clear reference, and to ensure that the listed standards and guidelines are regularly revised so that the most updated versions are adhered to.
- ATNI did not conduct a CF product profile assessment as part of the CF Marketing Index 2024. Nonetheless, as part of ATNI's action research, recent assessments have been conducted of the nutritional quality and labeling practices of commercial CF using the 2022 WHO Europe nutrient and promotion profile model (NPPM) for foods for infants and young children. A total of 177 CF products by Danone were assessed across seven countries (Austria, Egypt, Germany, India, Ireland, Italy and UK) and approximately 38% of those products met all nutrient composition requirements of the NPPM. Similar research was also conducted as part of the Consortium for Improving Complementary Foods in Southeast Asia (COMMIT) using a model that was adapted to closely align with the NPPM. Danone CF products were found and assessed across five of the seven Southeast Asian countries included in this research: Cambodia, the Lao People's Democratic Republic, Malaysia, the Philippines, and Viet Nam.
- For more information about these assessments and the findings, check <https://new-l40rlzsq.accesstonutrition.org/nppm-project-page/>.

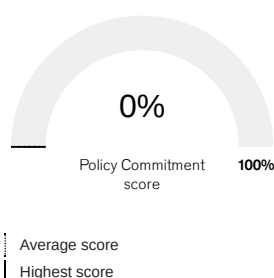


Management System

- Danone confidentially shared some procedure manuals developed by the company for ensuring the quality and safety of its BMS and CF products however since not all relevant commitments were found, and the documentation provided does not clearly outline the guidelines relating to CF product formulation, the company did not score on this aspect.

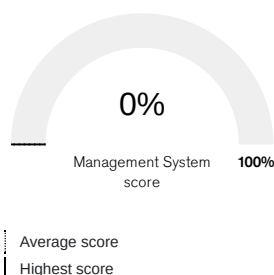
3. Marketing Messages

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Policy Commitment

- Compared to the 2021 assessment, Danone did not score on this topic since no explicit commitments were found to ensure that messages on all packaging and marketing/promotional materials of its complementary foods for older infants and young children aged 6-36 months align with the Code requirements of what should and should not be stated as per recommendation 4 of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9. The findings from the country assessments show that Danone's messages across all forms of marketing assessed and in all three countries did not fully align with the requirements of recommendation 4 of the WHA 69.9 guidance.
- Danone is encouraged to adopt these Code requirements in full for all CF marketing materials and clearly outline them in a company policy dedicated to the responsible marketing of complementary foods.

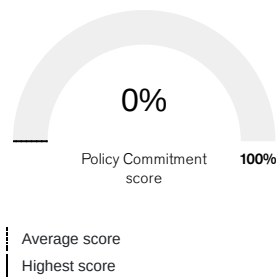


Management System

- Danone confidentially shared some guidance developed by the company for BMS and CF however since no relevant commitments were found, no relevant management systems were identified either, therefore the company also did not score in this aspect.
- To score in this area, Danone would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible CF (6-36m) marketing.

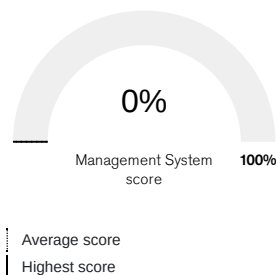
4. Avoidance of cross-promotion

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Policy Commitment

- Similar to the 2021 assessment, Danone did not score on this topic since no explicit commitments were found indicating that the company takes various measures to avoid promoting its breast-milk substitutes indirectly via the promotion of its complementary foods for older infants and young children aged 6-36 months, also known as cross-promotion. However, ATNI acknowledges that the company is working towards guidelines for cross-promotion according to its commitment to the BMS Call to Action. Although this commitment clearly addresses differentiation between the different BMS product types, it was not clear if it addresses cross-promotion between BMS and CF products.
- Danone is encouraged to adopt the Code requirements set out in recommendation 5 of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9 that address cross-promotion. The company is urged to clearly outline in a company policy dedicated to the responsible marketing of complementary foods how it will differentiate the packaging and other materials used in the marketing of CF from that used in the marketing of its BMS products, as well as commit to avoiding establishing contact with caregivers, including through baby clubs and social media groups and other platforms of communication.

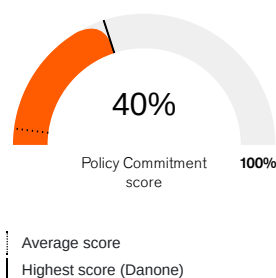


Management System

- Danone confidentially shared some guidance developed by the company for BMS however since no relevant commitments were found, no relevant management systems were identified either, therefore the company also did not score in this aspect.
- To score in this area, Danone would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible CF marketing.

5. Conflict of Interest

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



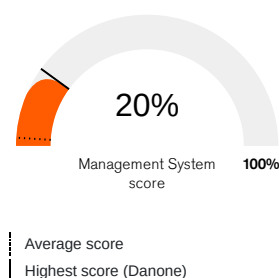
Policy Commitment

- Compared to the 2021 assessment, Danone improved its score on this topic since some explicit commitments were found to avoid conflicts of interest throughout the healthcare system in line with the Code, specifically recommendation 6 of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9.
- Danone was the only company that had commitments for this topic. Based on the company's guidance on compliance in healthcare systems (shared under NDA), Danone explicitly stated that it would not give any gifts or coupons to caregivers of infants and young children throughout the health system and that the information provided to health workers, including about

complementary foods (6-36 months), will be restricted to scientific and factual matters.

- To comply with the Code, Danone would need to commit to not using health facilities to host events of any kind and to not educate caregivers on infant and young child feeding.
- In addition, based on Danone's 2018 BMS marketing policy and its 2022 Healthcare Systems compliance policy, the company was found to allow the provision of contributions to health workers and sponsor their events under specific criteria, which the company should not do under any condition according to the Code.
- Danone is encouraged to adopt recommendation 6 of the guidance supported by WHA resolution 69.9, and clearly outline in a company policy dedicated to the responsible marketing of complementary foods how it will avoid conflicts of interest with healthcare workers and in healthcare facilities in line with these Code requirements.

Management System

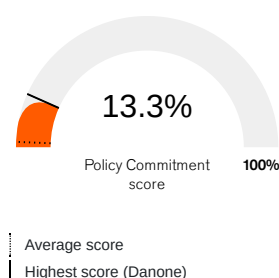


- Danone confidentially shared some general global and local guidance on compliance in healthcare systems developed by the company showing clear instructions to staff on how to interpret and apply relevant commitments related to the provision of gifts/coupons to caregivers within health facilities and information provided to health workers. However since no other relevant commitments were found in line with the Code, the company did not fully score in this aspect.
- Danone is encouraged to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible CF marketing.

6. Donations

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

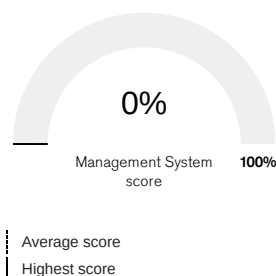
Policy Commitment



- Compared to the last assessment in 2021, commitments on donations of CF are now assessed in a separate topic and across several indicators, to ensure a more accurate assessment of the specific requirements relating to CF donations.
- Danone was the only company to score on this topic showing some explicit commitments in its guidance on donations (shared under NDA). The company was found to commit to not using donations or low-price sales of CF 6-36 products as a sales inducement if provided in emergencies or to social welfare institutions where older infants and young children require these products.

- Based on Danone's 2022 Healthcare Systems compliance policy and the company's donation guidance, it was found that the company may provide samples and donate CF products within healthcare systems, while the Code does not allow provisions to healthcare institutions under any circumstances and for any reason, even if the products are not directly provided to consumers or patients. Danone also falls short of meeting the Code requirements regarding donations by allowing the provision of equipment, materials and services to healthcare institutions.
- Although Danone has policies and guidance that cover some requirements regarding donations of its BMS products, Danone's commitments on donations of its CF 6-36 products are less clear. In regard to other criteria on donating CF products in line with the Code, no relevant information was found or provided by the company relating to CF 6-36 months.
- Danone is encouraged to clearly outline in a company policy dedicated to the responsible marketing of complementary foods how it will donate complementary foods for older infants and young children aged 6-36 months in various settings, and ensure that it follows recommendation 6 of the guidance supported by WHA resolution 69.9, as well as the requirements outlined in WHA resolutions 47.5 and 63.23 pertaining to donations, and the Operational Guidance for Infant and Young Child Feeding in Emergencies.

Management System

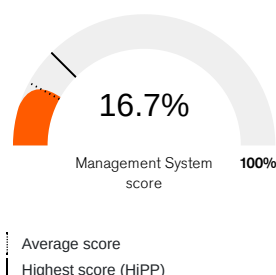


- Danone confidentially shared some general global guidance on compliance in healthcare systems and donation procedures developed by the company however since not all relevant commitments were found, no relevant management systems were identified either, therefore the company also did not score in this aspect.
- To score in this area, Danone would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible CF marketing.

7. Implementation and Monitoring

This topic consists of management system indicators only.

Management System

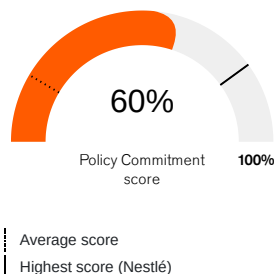


- Compared to the last assessment in 2021, commitments on implementation and monitoring of CF marketing commitments and practices are now assessed in a separate topic and across several indicators.
- Danone was found not to meet most of the requirements assessed in this topic, mainly due to the company's lack of commitments, specifically in relation to the marketing of complementary foods for older infants and young children aged 6-36 months.

- The company however explicitly states in its 2022 Quality and Food Safety commitments policy, and related procedures which were confidentially shared, that it follows more than one relevant food safety and quality management systems to certify its products.
- In addition to developing and having a comprehensive company policy dedicated to the responsible marketing of complementary foods, Danone is encouraged to clearly define and effectively communicate to all relevant employees and relevant executives their responsibilities for implementing commitments related to the marketing of CF 6-36.

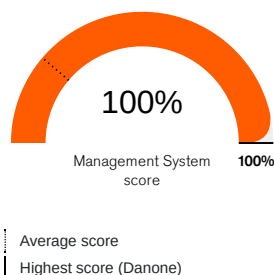
8. Lobbying and Influence

This topic consists of policy commitment indicators, management system indicators, and disclosure indicators. Each set of indicators contributes an equal weight of 33.3% each to the topic score.



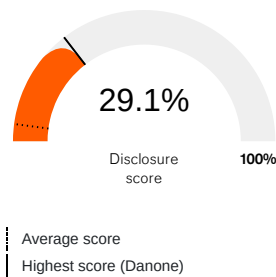
Policy Commitment

- Compared to the last assessment in 2021, commitments relating to the company's engagement with stakeholders on the Code and CF marketing are now assessed in a separate topic and across several indicators.
- Danone has a publicly available advocacy policy which is also applied when engaging on issues relating to CF and the Code. Based on this policy, Danone covers most commitments assessed in this topic, such as committing to support public interest and meet the company's objectives, as well as committing to avoid conflicts of interest and disclose if there are any, while engaging on CF related issues.
- Similar to other companies, Danone did not show commitments to support and not undermine existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code in full. No commitments were found neither showing that the company commits to periodically review the positions of trade association groups to which it belongs nor the extent to which their positions align with the company's own. Danone also did not show commitments that it will put in place controls over all lobbyists (in-house and intermediary, paid or unpaid) to ensure that they understand and adhere to organizational policies.



Management System

- Based on Danone's Policy on Advocacy (2023) the company shows extensive evidence that the company's Board has oversight of its lobbying policy and lobbying positions and activities. Further, the company names an executive/ function with the responsibility of implementing this policy. The company also provides clarity on control mechanisms (e.g. reporting to the Board, internal audits). Danone was the only company that had an extensive management system in place.

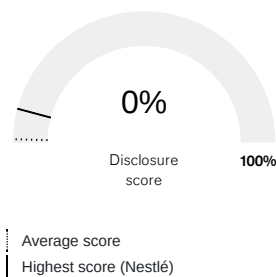


Disclosure

- Danone was found to disclose some lobbying-related activities such as publishing its positions on the Code and CF. However, no information was found on Danone's website neither of its interactions, nor of its trade associations, in legislative processes related to the Code and CF marketing, nor of links to relevant external platforms that may include this information.
- Although Danone publicly discloses Industry initiatives, such as the IFBA Guiding Principles for Stakeholder Engagement, ATNI advises the company to also follow other key public policy frameworks in private sector engagement and lobbying such as the WHO framework of engagement with non-state actors and OECD principles for transparency and integrity in lobbying, among others.

9. Disclosure

This topic consists of disclosure indicators only.



Disclosure

- Similar to the 2021 assessment, Danone did not score on this topic, mainly due to the company's lack of commitments specifically concerning the marketing of complementary foods for older infants and young children aged 6-36 months.
- In addition to developing and having a comprehensive company policy dedicated to the responsible marketing of complementary foods, Danone is encouraged to have its commitments available and easily accessible in the public domain.

Footnotes

1. CF refers to commercial complementary foods. These include baby porridge and cereals, dairy/fruit/vegetable-based baby purées, savory meals, and snack foods, as well as baby teas, juices, and water for infants and young children aged 6-36 months. CF products marketed to infants aged under six months are considered unwanted breast-milk substitutes, as these products interfere with exclusive breastfeeding in the first six months. However, ATNI assesses these products in the CF Marketing Index rather than the BMS Marketing Index, to emphasize that CF products are intended for older infants and young children aged 6-36 months and should not be introduced to infants aged under six months who should be exclusively breastfed.
2. 85% of Danone's global baby food sales are derived from breast-milk substitutes.
3. The Country Study score and Corporate Profile score each contribute to 50% of Danone's CF Marketing Index score.
4. This represents the average score of three country assessments: China, Germany and US.
5. Based on 2021 Euromonitor retail sales estimates.
6. Incidences of non-compliance include non-compliant labels and non-compliant observations from online and traditional media.
7. Where companies engaged, these numbers should represent the number of products confirmed to be marketed in these countries as communicated by the companies to ATNI. It is possible however that the number of products and brands assessed are not representative of each of the assessed markets, due to limitations in data collection and limited company engagement.
8. - Commercial complementary food intended for infants under six months of age (CF < 6). - Commercial complementary food intended for older infants and young children between six months and three years of age (CF 6-36 months). - Product brand relates to observations where no age is specified on a product or no specific product is promoted, but the observation is associated with a CF brand.
9. This is the company's average score on the 9 topics.
10. Euromonitor retail sales estimates (2021 data) were used to calculate the proportion of companies' global product sales covered per product type. It is important to note however that the underlying data used for the calculations may not be fully representative of the company's markets. Euromonitor International intelligence is used under license. Although Euromonitor aims to correct inaccuracies of which it is aware, it does not warrant that the data will be accurate, up-to-date or complete as the accuracy and completeness of the data and other content available in respect of different parts of the content will vary depending on the availability and quality of sources on which each part is based.
11. The Code recommends the introduction of CF products no earlier than six months of age to protect exclusive breastfeeding in this period. Since CF < 6 products should not be available on the market, they were counted as observations of non-compliance and not assessed on any further indicators that evaluate appropriate marketing practices. Therefore, the assessment across the 9 topics solely concerns the responsible marketing of CF 6-36 products.