



**DANONE**  
ONE PLANET. ONE HEALTH

# Living our commitment to responsible marketing of baby formula

2022 Report



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# Why we publish this report

At Danone, our mission is to bring health through food to as many people as possible. Knowing that proper nutrition during a baby's first 1,000 days is vital for long-term health, we are committed to giving babies the very best nutritional start in life.

Breastfeeding is essential to this, and, like the World Health Organization (WHO), we recognize that it must be protected and promoted. As a provider of baby formula, we value the trust parents place in us. We want to repay that trust by making sure that every one of them feels supported with high quality baby formula products as well as accurate, science-based information about nutrition for their child.

When it comes to responsible marketing, we strive to do better every year and everywhere we operate. We believe transparently reporting about our progress is essential for this. That's why this report summarizes the implementation of our Danone Policy for the Marketing of Breast-Milk Substitutes, based on independent external assessments and our own monitoring.

We're proud of our achievements in 2022, including the training of over 6,000 employees on our Danone BMS Policy and our updated Healthcare Systems Compliance Policy that is being implemented during 2023. As such, this report captures our progress, as well as an overview of alleged instances of

non-compliance with our strict global policies by Danone but also by partners like distributors and retailers indirectly involved in the marketing of our products.

We're convinced that as a leading manufacturer of baby formula we have a responsibility to raise the bar across the sector by reporting transparently beyond our direct scope. Although, we might not get everything right all the time, we're committed to continuous improvement and ensuring accountability for our actions. That's why this report also includes the steps we're taking to address and improve these examples of non-compliance with our BMS Policy.

We work tirelessly to contribute to infant and maternal health by protecting, promoting, and supporting breastfeeding and by upholding industry-leading standards for responsible marketing of baby formula. I am proud to share this progress report that provides a summary of what we learned in 2022 from living our commitment to responsible marketing of baby formula.

March 2023



**Jean-Marc Magnaudet**  
President of the  
Specialized Nutrition Unit



# Executive Summary

## What is this report?

Each year, Danone publishes a **report detailing its compliance with the Danone Policy for the Marketing of Breast-Milk Substitutes**. We strive to continuously improve our practices and transparently report our progress in the field of responsible marketing of baby formula based on independent external assessments, alongside our own monitoring.

## External assessment and verification of our practices

We rigorously monitor, report and review our own efforts — but **to ensure our approach is as robust as possible, we make sure we work with several qualified, external, third-party experts** to provide an independent assessment on how we're doing. This includes independent audits in at least three markets every year.

Working with **Bureau Veritas, ATNI, FTSE4Good & B Corp** gives us valuable external perspectives on what's working well and what can be improved. We believe that external monitoring enhances the compliance and integrity of marketing practices of individual companies, and ultimately, the entire industry.

## Our key achievements and figures of 2022

6,171



employees were trained in 2022 on the Danone Policy for the Marketing of Breast-Milk Substitutes.

We released an **updated version of our Healthcare Systems Compliance Policy** that we are progressively implementing in 2023. **This new policy ensures:**

We interact with the healthcare community and institutions responsibly, transparently and on factual and scientific grounds.



We can continue to develop products and services based on medical needs anchored in the latest scientific research.



At the end of 2022,

74.2%



of all businesses of Danone, in sales value, were certified by B-Corp, including entities involved in BMS marketing, which need to follow enhanced transparency standards by publishing individual BMS-responsible disclosure statements.

We continue to monitor allegations and act upon them. **In 2022, we received**



312

substantiated allegations, mainly due to activities initiated by non-contracted third parties.



# Delivering on our commitment to responsible marketing of baby formula

We're convinced that business can be a force for good, and that we can create and share sustainable value for all key stakeholders by using our scale for positive economic, social and environmental impact. Our approach to the ethical marketing of baby formula enables us to support breastfeeding and offer parents high quality nutrition for their babies when they cannot or choose not to breastfeed.

## The first worldwide marketing policy in the industry

In 2016, Danone decided to pave the way by becoming the first company worldwide to not advertise or promote infant formula for children aged 0-6 months, anywhere in the world, even if permitted by local laws. **We also voluntarily extended our Policy to 12 months in parts of the world where infant health is most at risk (as classified by the FTSE4Good BMS Criteria and our BMS Policy), to help encourage breastfeeding.** Since then, we have seen other companies unilaterally joining this movement to adopt global standards for BMS marketing, which has created a positive momentum in the industry. Our industry-leading BMS Policy is embedded across our business in every geography, often going beyond local market regulation to ensure high compliance standards, no matter where we're operating.



Danone supports the World Health Organization's (WHO) global public health recommendation calling for exclusive breastfeeding for the first six months of age and continued breastfeeding up to two years and beyond, combined with the safe introduction of appropriate complementary foods.

## Danone ranked #1 by Access to Nutrition Initiative (ATNI)

In 2021, Danone ranked number one for the second consecutive time with a score of 68% in ATNI's Global Index for the Marketing of Breast-Milk Substitutes. ATNI specifically acknowledged Danone's work to strengthen its overarching commitments to the responsible marketing of baby formula and the applicability to and implementation in its affiliates across the globe.



# Embedding high standards across our business

All of us at Danone, from our scientists to those working in marketing, sales and distribution, to our senior executives, are responsible for making sure we consistently meet the high standards we have set ourselves for the responsible marketing of baby formula.

## Educate

To ensure everyone is aware of their responsibilities and has the tools they need to do their part, we've put in place a simple but robust process, which starts with education and training upon our employees' induction to a new job and extends throughout everyone's employment journey.

In 2022, 6,171 employees were trained on the Danone Policy for the Marketing of Breast-Milk Substitutes.



## Equip

With the support of our global Early Life Product Compliance Committee – made up of senior leadership and subject matter experts – our network of “BMS Compliance Managers”, who work in Danone's respective markets, is responsible for the day-to-day local implementation and compliance with our BMS Policy. They raise awareness internally of the importance of responsible marketing of baby formula, and they also contribute to the implementation of consistent, clear and transparent actions based on the highest standards of behavior. Ultimate responsibility for local governance rests with the General Manager of each entity.



## Monitor

Regular internal and external assessments, reporting and verification processes ensure that we stay focused on the importance of compliance with our BMS Policy and continually improve how we operate.

We commission independent auditors to review our BMS marketing practices in at least 3 markets every year. We publish the summary of those audits on a yearly basis and consistently implement remediation actions to ensure full compliance with our BMS Policy standards.



## Management reporting and engagement

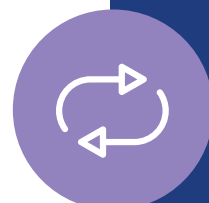
Danone's BMS Policy is implemented as an integral part of Danone's business practices, which is overseen by the company's top management. Each year, this report, including our internal Annual BMS Summary report, is shared, presented and discussed with Danone's relevant governance bodies and executive management teams.

In April 2022, the above mentioned was, for example, shared with the President of Danone Specialized Nutrition and the Danone General Counsel. In November 2022, both the external compliance report and the internal summary report was presented to Danone's Board of Directors (Engagement Committee).



## Improve and repeat

When it comes to compliance, the job is never complete. This is why we consider our policies and procedures as work in progress. We strive to ensure our learnings are reflected in our education and training, starting the cycle again.



### Our people set the standard

Employees who work on Danone's baby formula portfolio agree to abide by Danone's BMS Policy when they join the company. Our staff is regularly trained on the importance of following Danone's BMS Policy.

Consequently, it is our people who live our commitment by implementing our policy as a fundamental component of our business practices across all teams thanks to various awareness trainings and initiatives.



"I'm proud to work collaboratively with the business to act in a responsible way, following our BMS Policy. Not only are we ensuring the sustainability of the company, but most importantly we are supporting the rights of every child to receive the best nutrition, which is breast-milk."

Faika | Indonesia



"Complying with our BMS Policy is protecting breastfeeding every day by ensuring robust compliance best practices. At Danone, we always put ethics at the forefront and live our culture in favor of people's health. I am proud to be part of this movement."

Giovanna | Brazil



"I am proud to work on Responsible Marketing of Baby Formula with my team, as we engage with our colleagues and selected business partners to increase awareness of the importance of protecting and promoting breastfeeding."

Giovanna | Italy

### Our extensive reporting covers retail practices

To impact the wider ecosystem at scale, we do not limit our reporting to alleged instances of non-compliance attributable to Danone and contracted third parties (e.g. distributors), but we also report on other third parties, like retailers. Because we believe we have a role to play in raising awareness of the importance of responsible marketing of baby formula, we go beyond our direct scope of influence and work with retailers, e-commerce and pharmacies to encourage them to adopt responsible marketing standards for BMS products to the extent permitted by local anti-trust rules.

### Equipping and training our partners to fulfill their role

We have a duty to promote and advocate responsible business practices across our value chain and partnerships.

Therefore, we aim to provide comprehensive training to all partners that we work with on a contracted basis, to ensure they can fully comply with our BMS Policy. We actively support and encourage third party organizations we work with to familiarize themselves with and implement responsible formula marketing practices.



Worldwide policy with infant and maternal health at its heart.



Global implementation support and oversight

with clear individual accountability in markets.



Constant monitoring for improvement

with a commitment to conduct three country evaluations and an independent assessment of our approach.

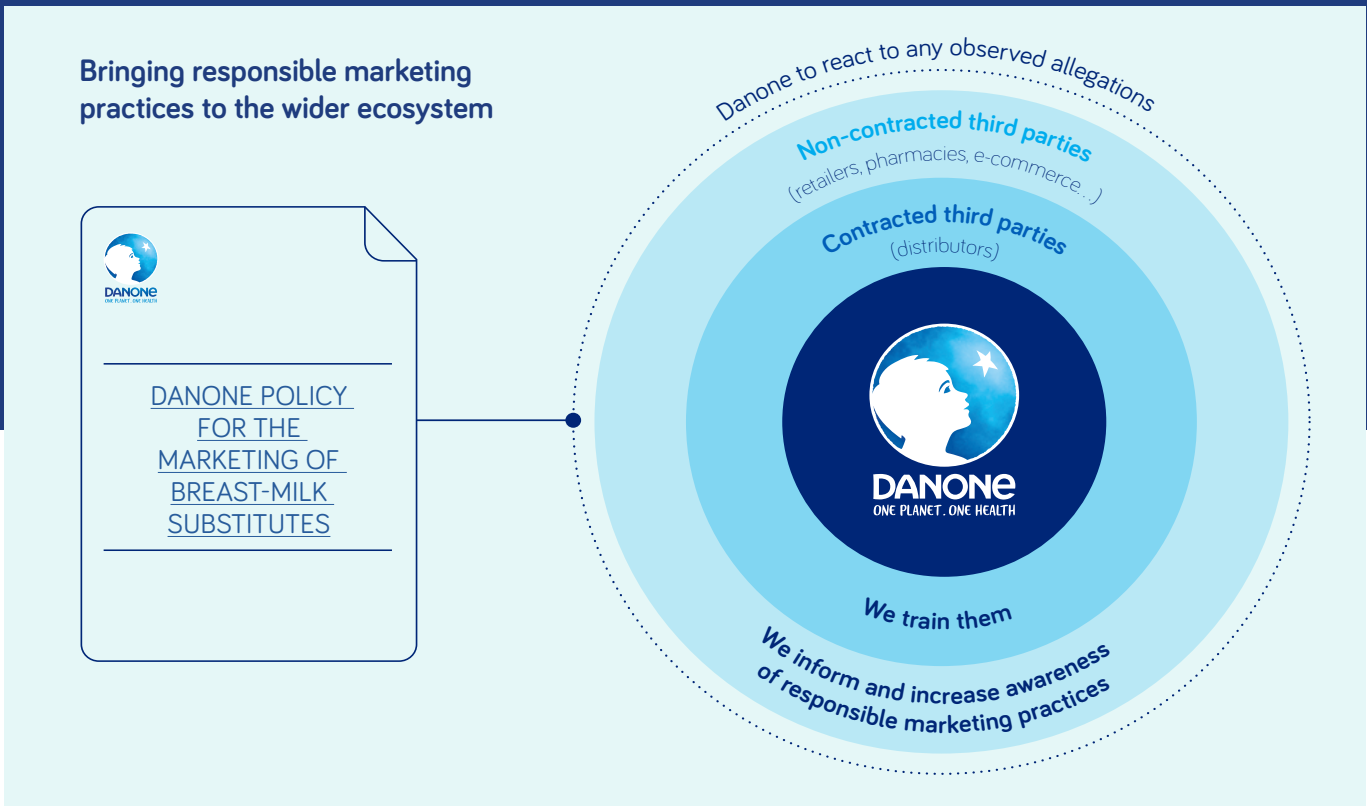


## Deployment of third-party training and awareness toolkit

In 2022, we developed and rolled out a training and awareness toolkit for our contracted and non-contracted retail and e-retail partners. This toolkit comprises

information and clarification on responsible marketing of breast-milk substitutes, as well as available options to raise external awareness about our BMS Policy for

our Commercial Third Parties through direct contact and clear, simple engaging communication training materials, within the boundaries of anti-trust rules.



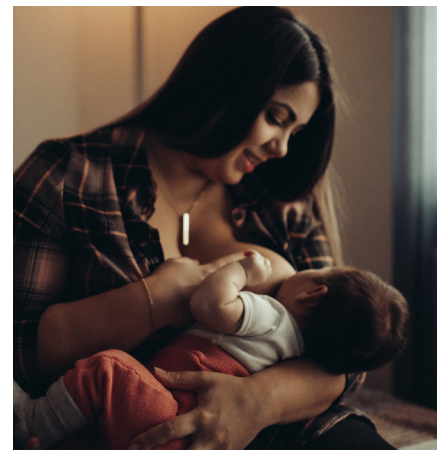
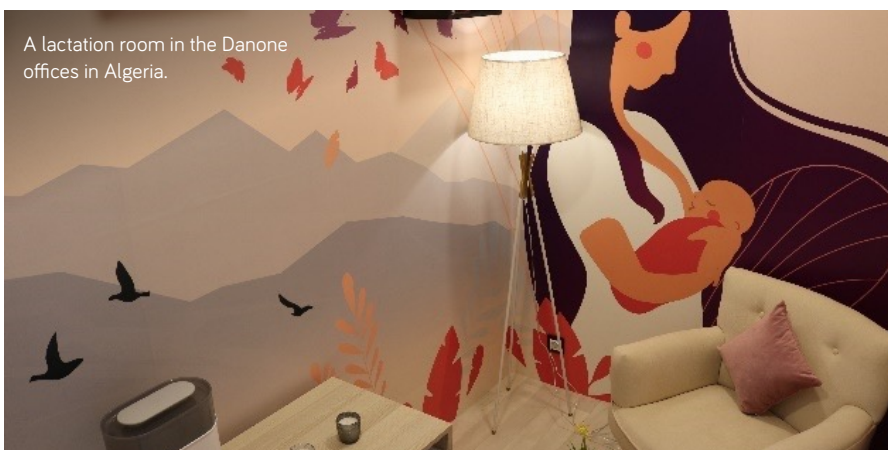
## Supporting breastfeeding in the workplace

At Danone, we believe breastfeeding can and should be enabled through policies that contribute to an environment in which parents feel supported to do so.

That is why, in 2017, we implemented a global parental leave policy through which we ensure parental leave for all employees, women or men, biological or adoptive parents, regardless of the country they live in.

**This initiative was recognized by UN Women, the UN organization dedicated to gender equality and the empowerment of women.** Lactation rooms are available in all Danone offices with more than 50 people. We also offer job-protection, flexible working hours and return-to-work programs that support the diverse needs of parents and caregivers.

We also encourage employee initiatives in this area, such as the internal pilot project of certified Breastfeeding Mama Mentors, set up by Danone employees at the end of December 2021 to support parents in their journey to feed and raise healthy babies, enabling conversations about choices, emotional challenges and access to information.





# Continuous improvement

## Our program in response to the BMS Call to Action

In response to the 2020 BMS Call to Action, we set out a clear program and roadmap embodying our commitment to infant and maternal nutrition and health, support for breastfeeding and increasing WHO Code compliance, including a specific commitment to revise our packaging designs to enable parents and caregivers to better differentiate between BMS and non-BMS products (as defined by local law or by our BMS Policy where this goes beyond local legislation).

**As part of this commitment, a first internal framework for product packaging**

**differentiation between BMS products, non-BMS products and other categories was created in 2022.** Based on this initial framework, new designs are being tested for consumer research in the first half of 2023 to ensure effective differentiation. The finalization of our product differentiation internal guidelines and the beginning of the roll-out of adapted designs are planned for the second half of 2023.

In line with our approach to engaging ethically and transparently with healthcare professionals and institutions, **we published an updated version of our industry leading**

**Healthcare Systems Compliance Policy in 2022.** Since 2017, this policy has served as the foundation for all engagement between our employees and healthcare systems, ensuring it is conducted on factual and scientific grounds. Based on learnings from the last five years, the updated version of the Policy includes improved protocols for engagement with healthcare professionals and ensures we continue to interact with the wider healthcare community and public openly, transparently and responsibly.

### B Corp certification as a mark of transparency and accountability

**B Corp certification is a mark of trust;** it indicates that a company is operating in a way that meets high standards of social and environmental performance, transparency and accountability, as assessed by the third-party non-profit organization B-Lab.

**By the end of 2022, 74.2% of all businesses of Danone,** in sales value, were B Corp certified, including entities involved in BMS marketing, which are subject to increased transparent disclosure requirements. **Danone's ambition is to achieve global B Corp certification by 2025.**

Since 2022, multinationals like Danone involved in the marketing of breast-milk substitutes are only eligible for global B Corp certification when meeting these disclosure requirements and marketing standards.\*

\*As part of the new updated standards for companies involved in the marketing of breast-milk substitutes that have been approved by the B Lab Standards Advisory Council. In 2021, Danone ranked number 1 for the second consecutive time in ATNI's Breast-Milk Substitutes and Complementary Foods Marketing Index. ATNI specifically acknowledged Danone's work to strengthen its overarching commitments to the responsible marketing of baby formula and the applicability to and implementation in its affiliates across the globe. During this year, all markets are increasing awareness of our compliance program in order to welcome the audits by ATNI in 2023.

### Responding to the baby formula shortages in the United States

**As a leading provider of baby formula, we understand how important it is for families to access formula when they cannot or choose not to breastfeed.** That is why we were committed to help alleviate the 2022 baby formula shortages in the United States. We worked with the White House and the FDA as well as various other US government agencies to increase availability of trusted, safe nutritional options for parents formula-feeding their babies.

As part of these efforts, we brought our Aptamil baby formula that was previously not available in the US to the country under a special enforcement discretion. All these actions were taken in line with the principles of our BMS Policy to protect breastfeeding. To further this commitment, Danone North America has for example notified its retailers of Danone's BMS Policy.

## External assessments



ATNI Global Index ↗  
2021



ATNI BMS Ranking ↗  
2021



FTSE4Good Re-certification ↗  
July 2022

# 2022 Performance

Our first report on compliance with our BMS Policy was published in 2013 as part of our effort to increase transparency and openness about how we work to ensure we are marketing baby formula responsibly. Reporting on our progress and identifying areas of improvement is how we continue to evolve and strengthen our processes and practices every year.

We encourage employees, our contracted business partners and other non-contracted third parties (e.g. retailers) to alert us to any potential situations that do not comply with the BMS Policy.

We appreciate feedback and getting things brought to our attention if there is ever a situation where it looks like we did not do enough to market our baby formula responsibly and to protect breastfeeding. We will carry out an internal investigation and we take reports like the ATNI Index 2021 — BMS subcategory and the FTSE in country verifications very seriously.

We always investigate the topics raised by our employees, as well as those by third parties. We receive allegations in several ways — via internal monitoring, external allegations (e.g. media and NGOs Bureau Veritas, ATNI and FTSE) or the Danone Ethics Line and external audit — and review all facts before considering an allegation as substantiated or unsubstantiated.

**Consequently, this report gives both an overview of non-compliance instances by Danone but also by third parties with whom we collaborate (both contracted and non-contracted), which underlines our efforts to guarantee that we bring responsible marketing practices to our wider ecosystem.**

In our reporting, we categorize allegations as either substantiated or unsubstantiated when compared with the marketing standards laid out in our BMS Policy. We follow a strict process of evaluation of each allegation received from our local business units — irrespective of how or by whom the allegation is reported.

An analysis of substantiated allegations is included in the [Appendix](#).

## We classify allegations as follows:



Interaction with the general public



Interaction with health workers



Labeling of products



Information and education campaigns reaching the general public

## Substantiated allegations are then further classified as either:



Actions conducted by Danone



Actions conducted by contracted third parties (e.g. distributors)



Actions conducted by non-contracted third parties (e.g. independent retailers or pharmacies)



In 2022, we saw an increase in the number of substantiated allegations by Danone and contracted partners (28) compared to 2021 (12), which is mainly due to more extensive monitoring by Danone and contracted agencies of online channels. Therefore, our 2023 priority will be to increase the awareness of our BMS Policy both internally and externally, particularly in relation to responsible marketing of baby formula in the online channels.

**In summary,** for the period 1 January to 31 December 2022:

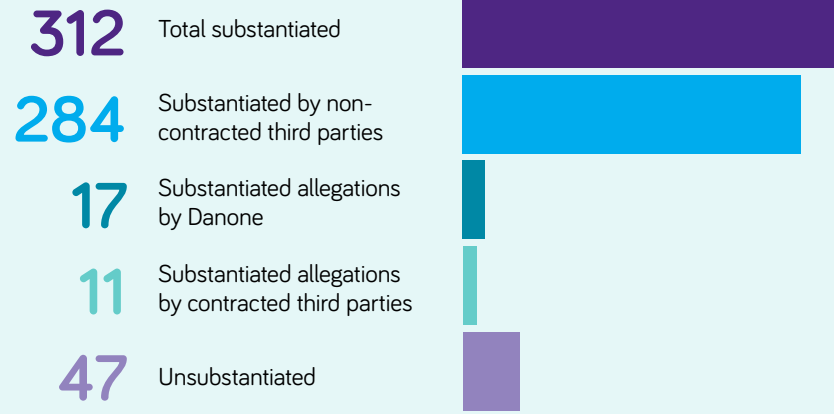
We received 312 substantiated allegations and additional 47 allegations which were found, after investigation, to be unsubstantiated. Out of the 312, more than 90% were due to activities initiated by non-contracted third parties.

As part of our global training and awareness program, we ensure we conduct systematic remediation and clear communication to relevant stakeholders, as we believe a better understanding of our standards contributes to increased accountability, which also enable our teams to come forward when it looks like we didn't get it right.

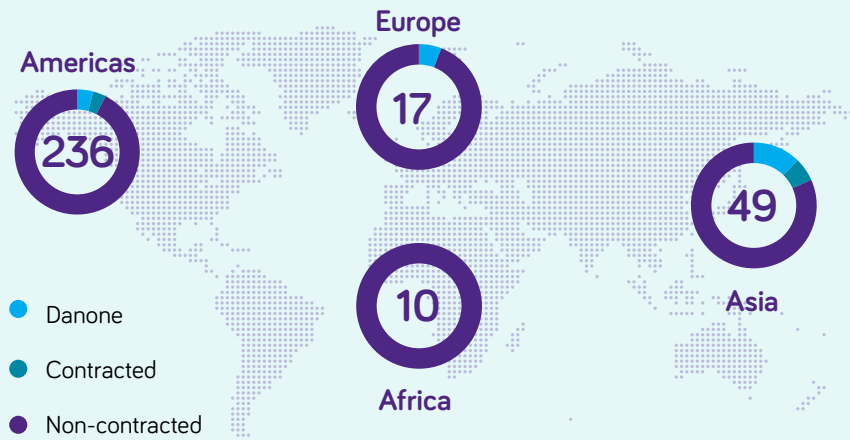
### Where did the substantiated allegations take place?

Due to the same proactive approach in Brazil as in 2020 and 2021, where we monitored compliance with our BMS Policy via a specialized external agency, there has been a high number of allegations found in Americas (236). In Europe and in Africa, there has been a slight decrease of allegations compared to 2021, from 18 to 17 in Europe and 13 to 10 in Africa. For Asia, numbers of allegations slightly increased due to increased efforts in the monitoring.

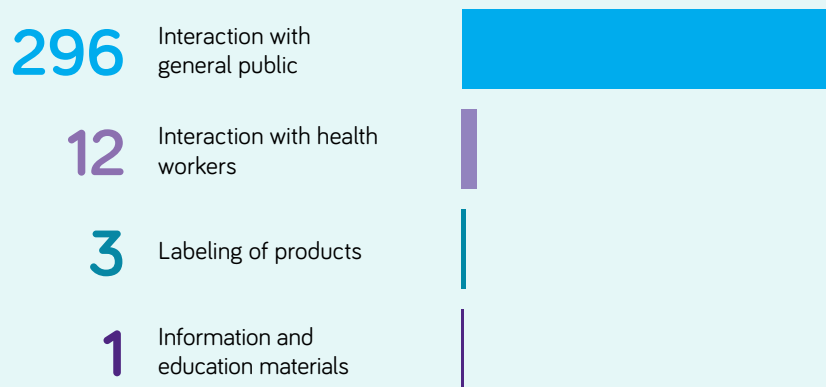
### Key figures for 2022



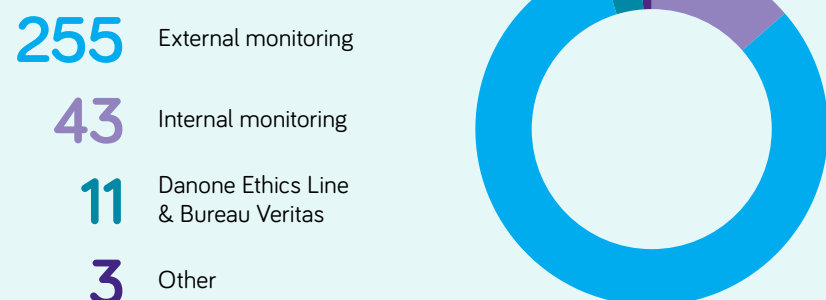
### Geographical split of the 2022 substantiated allegations



### What kind of substantiated allegations were received?



### How did the allegations come through?



## Bureau Veritas

In 2022, Bureau Veritas, an external auditor, was commissioned by Danone to undertake audits in China, Egypt, and Indonesia. These countries were selected based on the following criteria: infant malnutrition and mortality rates in the country and a rotation basis to ensure different countries are audited every year.

To assess our level of compliance with our BMS Policy in these countries, Bureau Veritas conducted interviews and reviews of requested documentation, records, local e-commerce sites and social media webpages.

### In these three countries, the audits found several areas of best practice, including:

In all three countries, the personnel had an overall good awareness of the requirements of the BMS Policy and what constitutes Covered Product as defined in the BMS Policy and under the Local Code.

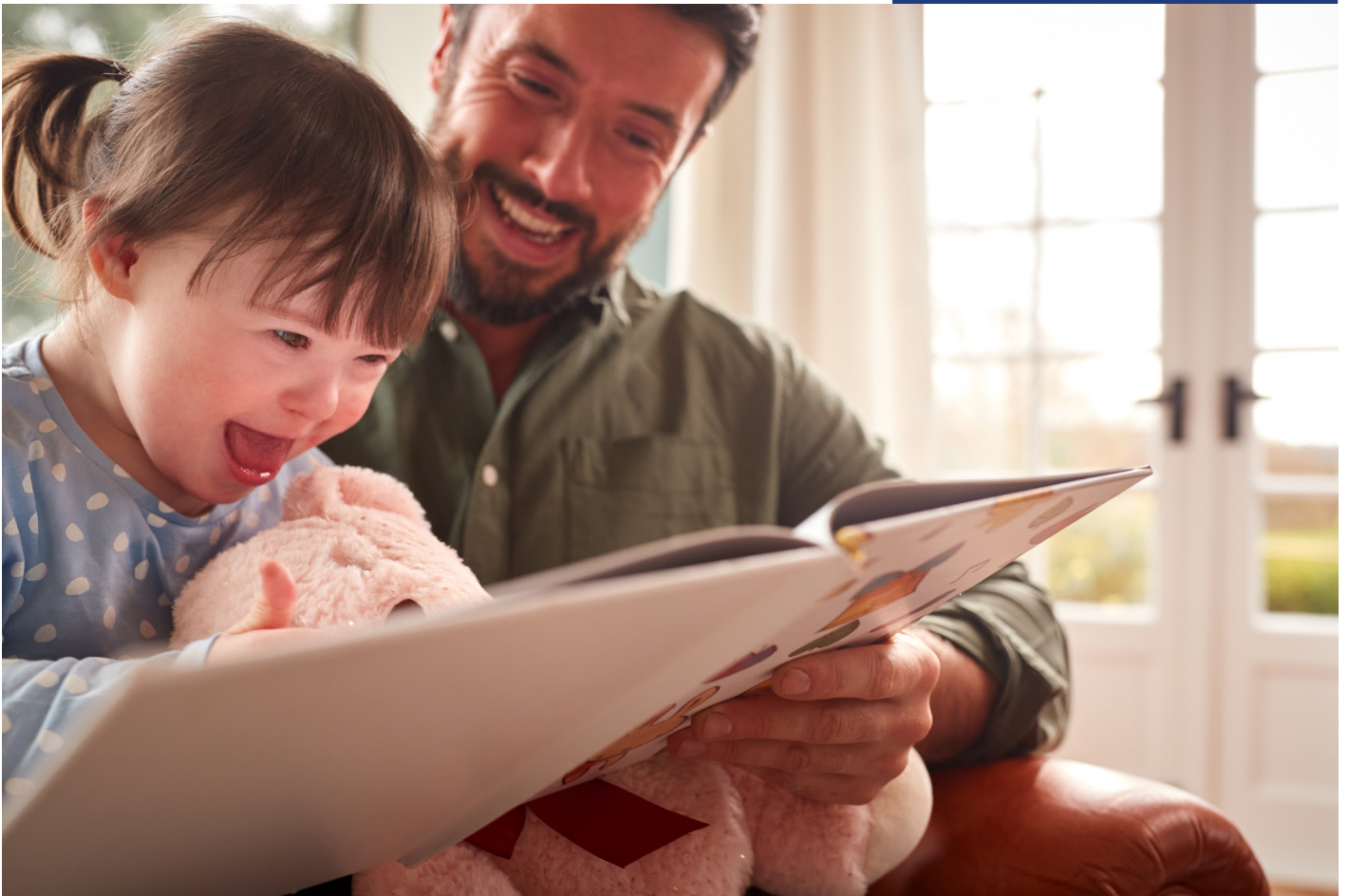
- ✓ The team in China was well prepared and responsive with any follow-up queries and requests.
- ✓ The majority of requested documentation was readily available for review in Egypt.
- ✓ The training program on the Local Code and BMS Policy was well established and thoroughly implemented in Indonesia.

## Danone Ethics Line

The Danone Ethics Line is a tool that enables employees (but also any external third party) to report potential non-compliance anonymously and outside their normal management reporting line.

**The Ethics Line aims to empower people to call out anything of concern without fear of repercussions.** This line can be easily accessed online, and people can open a confidential post box to communicate with authorized employees at Danone's head office in Paris. The platform can be used for concerns of non-compliance with our BMS Policy. Every issue raised is then investigated and appropriate action taken if non-compliance is found.

[www.danoneethicsline.com](http://www.danoneethicsline.com)



The audits also enabled us to identify areas for improvements, as explained below, which we promptly addressed with specific remediation plans:

**China**

**Non-conformance**

It was observed on a sample of Covered Products Labels that one of them did not include the statement on superiority of breast milk for infants as required by the BMS Policy.

There were identified instances of discounted pricing in two stores and five e-commerce websites for products, which did not meet the requirements of the BMS Policy. However, no evidence suggested the description was created at the request or with the consent of Danone.

**Action**

The important notice on the product labels will be updated during the next window of registration/label overhaul. Danone highlighted its BMS Policy with contracted business partners, and it continues to monitor the BMS Policy adherence on online e-commerce platforms and the allegations received. Danone commits to increase awareness of BMS Policy with internal Early Life Nutrition employees through dedicated mandatory e-learning.

**Egypt**

**Non-conformance**

It was identified that an online supermarket was selling a Covered Product at a discounted price. However, this was a single identified incident and no evidence suggested the description was created at the request or with the consent of Danone.

**Action**

The discounted price was stopped immediately. The local business unit will continue to monitor stores online and by 2023 Danone commits to remind all the online retailers of the BMS requirements.

**Indonesia**

**Non-conformance**

It was observed that multiple e-commerce platforms and retail stores were offering what appeared to be discounted prices for Covered Products, though the discount was not actually applied when the product reached the checkout. Whilst it was noted that the products were not in fact being offered on discount, these instances can be perceived to be promotional devices attracting attention and incentivizing the sale of Covered Products contrary to the BMS Policy and have been collectively grouped into one non-conformance. There was no evidence to suggest that these perceived promotions were placed at the request of Danone.

**Action**

In 2023, Danone will ensure that contracted third parties will be trained and that non-contracted third parties will be aware of our BMS Policy in order to avoid promotion of Covered Products. Furthermore, we will ensure that they will also be trained on the correct location of point of sales materials.

Alongside the specific action plans implemented in the various audited countries, we have also defined some key areas of improvement:

**Third party awareness**

We remain committed to working closely with business partners to establish awareness and promote responsible marketing practices. With a continued focus on education and training, especially when it comes to retailer and consumer interaction, collectively we can raise the standard, both for ourselves and the rest of the industry.

**Training records**

To make sure we monitor the numbers and timing of employees trained on the BMS Policy correctly, we will focus on maintaining accurate training records and store them locally. The records should be complete, consistent, and easily accessible.

# Living our commitment

Our ongoing commitment to protecting and promoting breastfeeding is at the heart of our approach to the responsible marketing of baby formula. It is how we believe we can impact the wider ecosystem at scale.

We believe that better understanding of our standards ensures better accountability based on our internal monitoring and external assessments.

External assessment and the dialogue about our policy and practices help us progress responsibly as a company, through further implementation of responsible and ethical marketing practices at Danone and with our partners.

It is what enables us to live our mission of bringing health through food. Breastfeeding is key for giving babies the best nutritional start in life, and we will always be proud to promote and protect breastfeeding whilst providing parents with safe, quality options if families cannot or choose not to breastfeed.



# Substantiated allegations concerning activities by Danone (17)

Month	Region	Summary of allegation	Summary of corrective actions	Category	Actual time of response to the complainant and to start remediation
February	Americas	Danone inadvertently granted a discount through a welcome coupon at our e-commerce, despite stating in a disclaimer that it would not be applicable to Covered Products.	There was a technical error in the system which was permanently resolved by the e-commerce team.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks
February	Americas	Danone granted a discount despite the disclaimer that it would not be applicable for Covered Products.	There was a technical error in the system which was permanently resolved by the e-commerce team.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks
February	Americas	On the website, a promotional description of Covered Products was displayed.	Instructions given to the e-commerce team that all descriptions have to be approved in the Customer Value Management (CVM) process.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks
February	Americas	A post on Instagram did not include the mandatory disclaimer of the Ministry of Health.	The contracted agency received proper training regarding mandatory disclaimers and our BMS Policy.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks
February	Europe	The authorities found a claim which was considered to be an unauthorized comparison with breast-milk.	Danone has a divergent interpretation of the EU regulation but has stopped all campaigns with the discussed claim.	Interaction with General Public (BMS Policy Art. 3)	1 day
March	Americas	On a news portal and on YouTube Covered Products advertisements were shown with a link to Danone's e-commerce.	Advertisements were stopped immediately, and the contracted agency was trained on local regulation and BMS Policy.	Interaction with General Public (BMS Policy Art. 3)	1 day
March	Asia	Not enough differentiation between the labels of Covered Products and non-Covered Products.	Remove old packaging of Covered Products from the market.	Labeling of Covered Products (BMS Policy Art. 12)	< 4 weeks
April	Asia	The content in Facebook Live by a doctor under the topic "how to choose nutrition for your child" showed packages of Covered Products.	The third-party agency is instructed that all future communication have to be approved via CVM.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks

Month	Region	Summary of allegation	Summary of corrective actions	Category	Actual time of response to the complainant and to start remediation
May	Americas	A broker contract was approved internally that included a discount on Covered Products. A limited quantity of 5 units in total were sold with a discount.	Updated the system to remove permanently Covered Products from all promotions.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks
June	Asia	The price of Covered Products was displayed in large font.	Instructions to the sales force have been reiterated: at least 50% of the shelf should display non-Covered Products and prices should not be communicated in large font.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks
June	Asia	Unsolicited adverts of Covered Products were published on YouTube.	Agency was trained and a process is created in order to prevent this from happening in the future.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks
June	Americas	On a Danone website, a baby formula had an incorrect indication age.	Age indicated was corrected and the responsible team was reminded of the BMS Policy	Information and Education Materials (BMS Policy Art. 2)	< 1 week
June	Americas	The Danone website had the wrong indication age group for a formula product.	Danone has adjusted the age group information, which is now displayed correctly on the site.	Interaction with General Public (BMS Policy Art. 3)	< 1 week
July	Asia	Displaying a claim as stand-alone is deemed as advertising or promotion of Covered Products.	The claim was moved closer to the non-Covered Products.	Labeling of Covered Products (BMS Policy Art. 12)	< 4 weeks
November	Americas	Advertising for Covered Products on an online news portal.	There was a technical error in the system which was permanently resolved by the e-commerce team. The promotion has ended.	Interaction with General Public. (BMS Policy Art. 3)	< 1 week
November	Americas	Improper promotion of Covered Products was identified on Facebook.	The issue was highlighted and corrected by the settings in the tool.	Interaction with General Public (BMS Policy Art. 3)	Americas
December	Asia	Statement on superiority of breast-milk was missing on the label of a formula product.	Update the important notice on the product labels during the next window of registration/label update.	Labelling of Covered Products (BMS Policy Art. 12)	Depended on registration time



# Substantiated allegations concerning activities by contracted third parties (11)

Month	Region	Summary of allegation	Summary of corrective actions	Category	General time frame of response
March	Americas	Health Care Professional (HCP) / Health Care Organization (HCO) did not sign a receipt form for Product for Professional Evaluation (PPE).	Ensure that the Health Care Professional (HCP) / Health Care Organization (HCO) sign a receipt when Product for Professional Evaluation (PPE) is received.	Interaction with Health Workers (BMS Policy Art. 4)	< 4 weeks
March	Americas	Donations documents were not complete.	Ensure to follow HCS/BMS Policy regarding donations.	Interaction with Health Workers (BMS Policy Art. 4)	< 4 weeks
March	Asia	A Danone logo was featured on the invitation card of a webinar co-organized with the Pediatric Association. The logo was considered a company logo.	The logo was removed from invitation card of the webinar.	Interaction with Health Workers (BMS Policy Art. 4)	< 4 weeks
May	Americas	Lack of formal controls, understanding, and documentation for provision of Product for Professional Evaluation (PPE), gifts and hospitality and events with Healthcare Professionals (HCPs).	The distributor was instructed to take immediate corrective actions and ensure that going forward all activities are in compliance with the BMS and HCS policies.	Interaction with Health Workers (BMS Policy Art. 4)	< 1 week
May	Americas	Product for Professional Evaluation (PPE) given to general public via Healthcare Professionals (HCPs).	The distributor was instructed to stop this practice with immediate effect.	Interaction with General Public (BMS Policy Art. 3)	< 1 week
July	Americas	Lack of formal controls, understanding, and documentation for provision of Product for Professional Evaluation (PPE) and gifts to Healthcare Professionals (HCPs).	The distributor was instructed to take immediate corrective actions and ensure that going forward all activities are in compliance with the BMS and HCS policies.	Interaction with Health Workers (BS Policy Art. 4)	1 day
August	Americas	Contracted third party (agency) published an article online around the concept of choice in relation to infant feeding.	The agency was instructed to remove the article and the third party received additional training related to our BMS Policy and the dos and the don'ts.	Interaction with General Public (BMS Policy Art. 3)	< 1 week
August	Americas	A distributor was promoting Covered Products.	We contacted the distributor to inform them about the restriction of our BMS Policy. Promotions were stopped.	Interaction with General Public (BMS Policy Art. 3)	< 4 weeks

Month	Region	Summary of allegation	Summary of corrective actions	Category	General time frame of response
October	Americas	Procedures regarding Product for Professional Evaluation (PPE) were not fully followed. No receipt forms with signatures were received.	The distributor understood the gaps and is now applying the correct documentation and procedure.	Interaction with Health Workers (BMS Policy Art. 4)	< 4 weeks
December	Americas	Procedures regarding Product for Professional Evaluation (PPE) were not followed, both in numbers as well as documentation.	The distributor understood the gaps and is applying the correct documentation and procedure.	Interaction with Health Workers (BMS Policy Art. 4)	< 1 week
December	Asia	Disproportionate hosting and funding of educational events overnight stays without substantiation. The procedure of the Product for Professional Evaluation (PPE) was not aligned with Danone BMS Policy.	The distributor understood the gaps and is applying the correct documentation and procedure.	Interaction with Health Workers (BMS Policy Art. 4)	< 4 weeks

## Substantiated allegations concerning activities by non-contracted third parties (284)

Number of allegations	Category	Summary of allegation	Summary of corrective actions	General Time Frame of Response
280	Interaction with General Public (BMS Policy Art. 3)	Discount and promotion of Covered Products in traditional and online channels.	In all 280 allegations, the discounted price was adjusted by the third party and / or the third party was informed that such promotion is not permitted, and promotion was stopped. We reiterated to the third party our commitments and the importance of compliance with our BMS Policy.	< 4 weeks
4	Interaction with Health Workers (BMS Policy Art. 4)	Display of Covered Products at clinic waiting area.	The products were removed from the clinic waiting area. The clinic was reminded not to display Covered Products in public area.	< 1 week



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