



**DANONE'S REPORT**  
on alleged non-compliance with  
**the Danone Policy**  
**for the Marketing of**  
**Breast-Milk**  
**Substitutes**

**2018**

## Early Life Nutrition and Danone's Mission

Danone's mission is "***To Bring Health Through Food to as Many People as Possible***" and we do this by providing healthy and nutritious products to millions of people around the world. As a leader in early life nutrition, we have a key role to play in both adhering to and promoting responsible and ethical marketing practices.

## Our Commitment to Responsible Marketing

At Danone, we understand the challenges faced by parents in raising their children and we believe that all parents should have access to the right information to allow them to make appropriate and informed feeding choices for their children.

In support of this, we acknowledge the importance of the International Code of Marketing of Breast-Milk Substitutes ("BMS") and subsequent relevant World Health Assembly ("WHA") resolutions and support the World Health Organisation's ("WHO") recommendation calling for exclusive breast-feeding for the first six months after birth and continued breast-feeding along with the introduction of safe and appropriate complementary foods thereafter. We work alongside committed partners, mobilising stakeholders to promote the long-term benefits of ensuring the right nutrition during the first 1000 days.

## Breast-Milk Substitutes Policy

In June 2018, Danone has revised and updated its [Policy for the Marketing of Breast-Milk Substitutes](#) (the "Policy"). The revised Policy continues to detail areas where employees need to make ethical decisions related to the marketing of BMS. The Policy does not replace the WHO Code, but provides instructions and guidance when undertaking a broad range of marketing activities related to BMS.

The 2018 Policy also includes the Danone procedures manual (Governance) for implementing its Policy. This chapter sets forth Danone's internal processes and provides guidelines for consistent application and implementation for all Danone entities involved in the marketing & sale of BMS.

## Compliance with our Policy

Danone has committed to preparing and publishing an annual report for our stakeholders and other interested parties which details how the company complies and manages compliance with our own Policy. It is part of our efforts to ensure greater transparency and accountability for our actions and to detail instances of non-compliance, and corrective actions undertaken.

## Reporting on Compliance

Allegations of non-compliance with the Policy may be received through any communication means, including, but not limited to email, Danone websites, telephone, letter or the Danone Ethics Line ([www.danoneethicsline.com](http://www.danoneethicsline.com)). In our reporting, we categorise allegations as either substantiated or unsubstantiated versus our Policy and/or local regulations. We follow a strict process of evaluation of each allegation received from our local business units – irrespective of how or from whom, the allegation is reported.

At Danone, we take every non-compliance allegation very seriously. We investigate promptly to determine the best course of action to remediate the situation and prevent further occurrences.

Once an allegation is received by Danone, all facts are reviewed to establish if the information presented is genuine, and an investigation is made promptly to determine whether the alleged activity is compliant with our own Policy and applicable legislation regarding the marketing of breast-milk substitutes.

We review compliance according to the following categories:

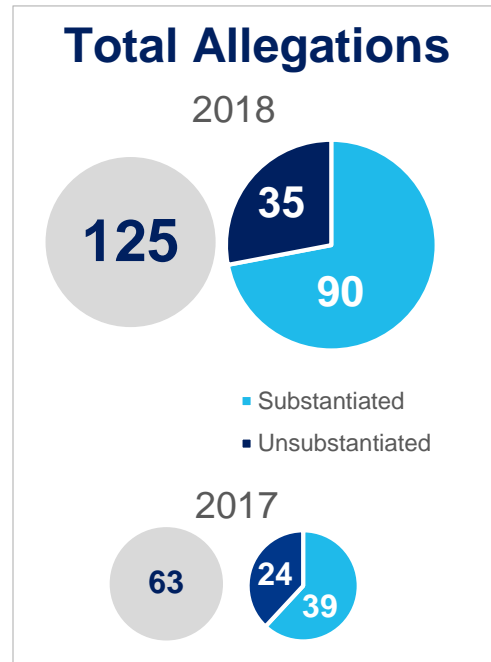
- Interaction with the general public
- Interaction with health workers
- Labelling of covered products
- Information/Education to the general public.

Substantiated allegations are then further classified as to:

- a) Actions conducted by Danone (which includes all subsidiary companies).
- b) Actions conducted by third parties (for example independent retailers, pharmacies).

A full analysis of substantiated allegations (related to either our own actions or those of third parties) is detailed in the Appendices to this report, but in summary, the following can be reported on, for the period 1 January to 31 December 2018:

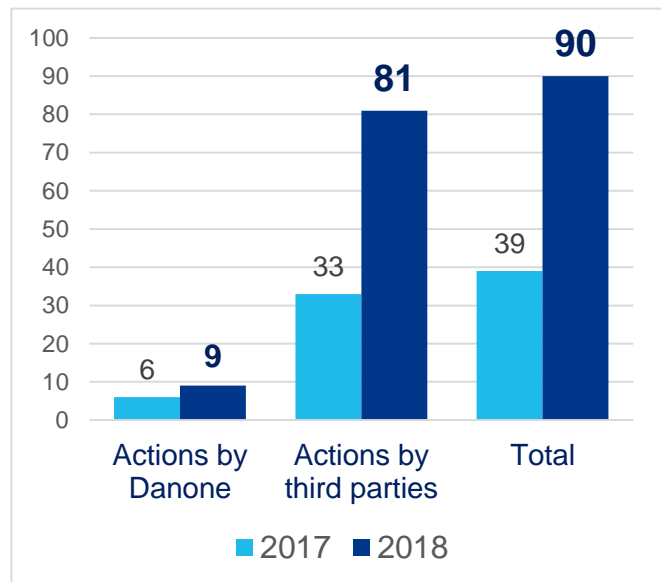
- No evidence of systematic violations of our Policy or local regulations were identified.
- A total of 125 allegations were received.
- 90 were assessed as being substantiated:
  - 9 due to actions by Danone
  - 81 due to actions by third parties.
- 35 allegations were found to be unsubstantiated.



Any further analysis included in this report, has been prepared on the basis of the 90 substantiated allegations only.

### Analysis of Substantiated Allegations 2018 vs. 2017

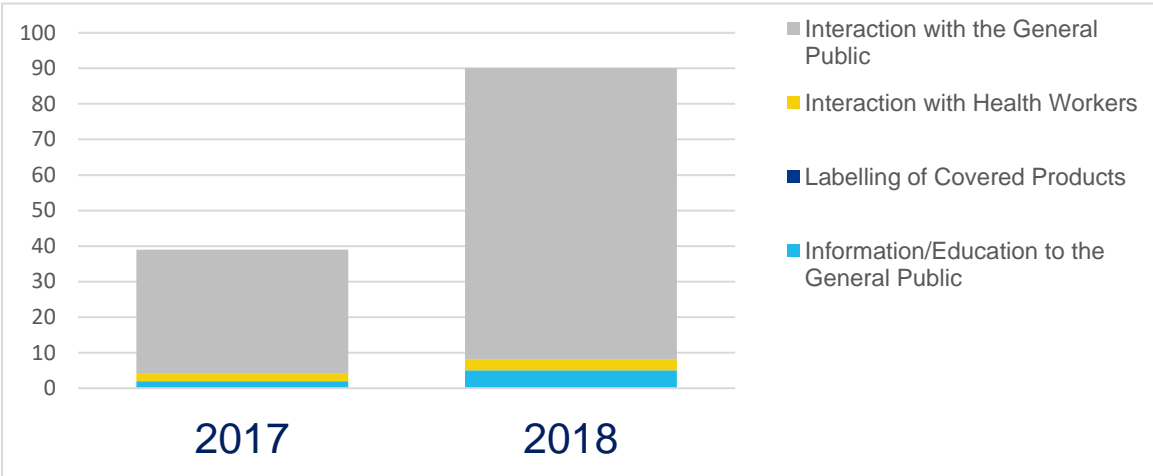
- Total substantiated allegations increased from 39 to 90 vs. 2017.
- The number of substantiated allegations attributable to Danone was 9, compared to 6 in 2017. An increase of 50%.
- The substantiated allegations resulted from actions undertaken by third parties increased by 145% compared to 2017 (from 33 to 81).



# Categories of Allegation

Danone receives allegations from different sources and reviews all facts before an allegation is assessed as substantiated. We have analysed below the category and geographic region of the substantiated allegations.

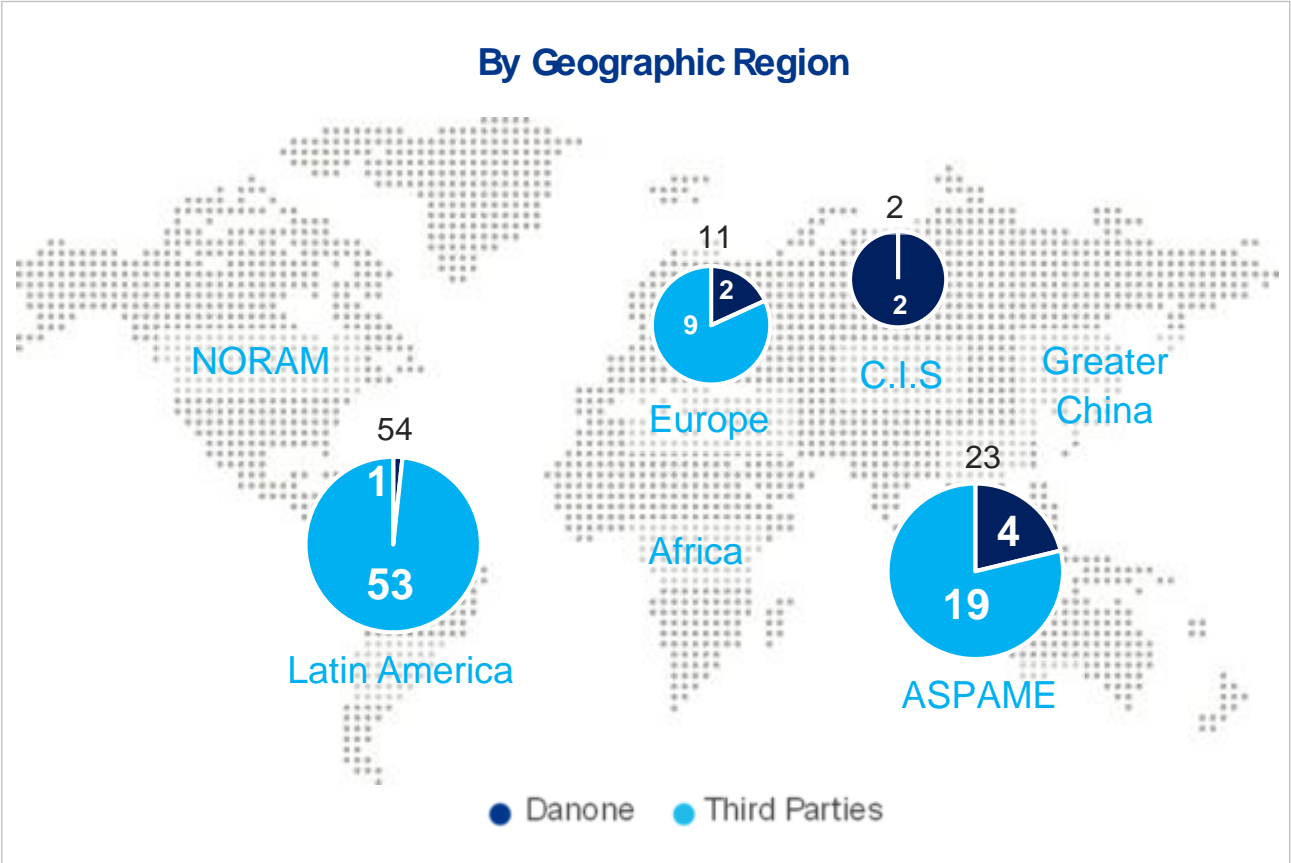
- Interaction with the general public: 81
- Interaction with health workers: 2
- Labelling of covered products: 2
- Information/Education to the general public: 5



## Geographical Analysis of Substantiated Allegations

In general, the geographical distribution of all substantiated allegations in 2018 has remained similar compared to 2017. For example, 33% (13 out of 39) of all substantiated allegations in 2017 were reported in the ASPAME region, whereas in 2018 26% (23 out of 90) of all substantiated allegations were reported in that region. In 2018, most substantiated allegations were reported in Latin America (60% - 54 out of 90), whereas this region accounted for 49% (19 out of 39) of all substantiated allegations in 2017.

Total 90 substantiated allegations:



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## Conclusion

The year 2018 saw an increase in total substantiated allegations; from 39 in 2017 to 90 in 2018. Ever since we set up our BMS Policy in 2011, we've focused on ensuring compliance throughout our company and our distribution network. Furthermore, we've focused on raising greater awareness of the Policy – both among employees and our business partners – and have encouraged them to flag any potential situations that do not comply with the Policy. In addition, in 2018 we strengthened our governance structure that oversees how our BMS Policy is implemented, which has contributed to a higher number of substantiated allegations in 2018. We will continue to raise awareness on the importance of reporting and monitoring compliance with our Policy by us, our Partners and our third party ecosystem.

From all 90 substantiated allegations, 82 allegations were originating from “Interactions with the general public”. We have taken corrective actions by sending letters to third parties to re-iterate our commitments and the importance of compliance to our Policy. It remains a focus area to train and monitor relevant third parties and Danone employees.

We remain committed to working closely with business partners, trade associations, industry groups and multiple stakeholders to establish awareness and promote responsible marketing practices. With a continued focus on education and training at the retail outlet/consumer interaction level, collectively we aim to improve both our own practises and those of the industry. We encourage all stakeholders and consumers to report any instances of alleged non-compliance with our Policy or local regulations, through any communication means, including, but not limited to email, Danone websites, telephone, letter or the Danone Ethics Line ([www.danoneethicsline.com](http://www.danoneethicsline.com)).

## **Attachments:**

Appendix 1: Substantiated Allegations Concerning Activities by Danone

Appendix 2: Substantiated Allegations Concerning Activities by third parties



## Appendix 1: Substantiated Allegations concerning activities by Danone

Month	Category	Summary of Allegation	Comments	Summary Corrective Actions	Region	
1	January	<i>Interaction with General Public</i>	Promotion of complementary food for infants less than 6 months.	In line with our Policy, in higher risk countries, complementary food for infants less than 6 months should not be promoted.	Promotion was stopped immediately. Re-iterated to the Country Business Unit (CBU) our commitments and the importance of compliance to our Policy.	Latin America
2	January	<i>Interaction with Health Workers</i>	Administration fees paid to hospitals without correct documentation and appropriate approval.	In line with our Policy, all financial interactions with Healthcare Professionals (HCPs) need to be validated, approved and documented.	The way of working with hospital has been changed. Re-iterated to the CBU and HCP our commitments and the importance of compliance to our Policy.	ASPAME
3	August	<i>Interaction with General Public</i>	Promotion of infant formula using special display at retail level.	In line with our Policy, infant formula should not be promoted or advertised.	Special display was removed from stores immediately. Re-iterated to the CBU and retailer our commitments and the importance of compliance to our Policy.	Europe
4	November	<i>Interaction with General Public</i>	Promotional header for different product was located in infant formula and follow-on formula section.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Point of sale material was removed immediately. Re-iterated to the CBU and retailer our commitments and the importance of compliance to our Policy.	ASPAME

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5	November	Interaction with Health Workers	Procedure of donations to a healthcare organization.	In line with our Policy and local regulations, a different procedure should have been followed.	Local team was trained on approval of Healthcare Systems (HCS) activities and local rules to be reflected in the light of HCS requests and approvals. Re-iterated to the CBU and Distributor our commitments and the importance of compliance to our Policy.	ASPAME
6	December	Interaction with General Public	Discounted price offered for multiple births.	In line with our Policy, infant formula should not be promoted or advertised.	Re-iterated to the CBU our commitments and the importance of compliance to our Policy.	ASPAME
7	December	Information and Education Materials	Promotional video on social media which did not include all necessary information and disclaimers.	In line with our Policy, unbranded Informational and/or Educational Materials, whether written, audio, or visual, dealing with the feeding of infants and intended to reach pregnant women and mothers of infants, should include an "important notice".	The promotional video was stopped immediately. Re-iterated to the CBU our commitments and the importance of compliance to our Policy.	Europe
8	December	Interaction with General Public	Promotion by displaying pictures of infants below 12 months of age linked to the infant formula brand name.	In line with our Policy, in higher risk countries, pictures of infants less than 12 months should not be displayed and should not be linked to infant formula product brand names.	The promotion was stopped immediately and an approval system for the validation of consumer communication has been implemented. Re-iterated to the Distributor our commitments and the importance of compliance to our Policy.	C.I.S.

9	December	<i>Interaction with General Public</i>	Online promotion by displaying pictures of infants below 12 months of age linked to the infant formula brand name.	In line with our Policy, in higher risk countries, pictures of infants less than 12 months should not be displayed and linked to infant formula product brand names.	The promotion was stopped immediately and an approval system for the validation of consumer communication has been implemented. Re-iterated to the Distributor our commitments and the importance of compliance to our Policy.	C.I.S.
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## Appendix 2: Substantiated Allegations concerning activities by third parties

Month	Category	Summary of Allegation	Comments	Summary Corrective Actions	Region	
10	January	Interaction with General Public	Promotion of infant formula and follow-on formula using a point of sale material at retail level.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such point of sale material is not permitted, and the materials were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
11	January	Interaction with General Public	Promotion through discounted price of follow-on formula in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
12	January	Interaction with General Public	Online promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
13	January	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
14	January	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
15	January	Interaction with General Public	Promotion of follow-on formula using a special display in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME

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16	February	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
17	February	Interaction with General Public	Promotion through discounted price of follow-on formula in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
18	March	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
19	March	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
20	March	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
21	April	Interaction with General Public	Promotion of infant formula using a special display.	In line with our Policy, infant formula should not be promoted or advertised.	HCP was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
22	April	Interaction with General Public	Promotion of follow-on formula using a special display in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME

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23	April	<i>Interaction with General Public</i>	Point of sale material for young child formula was located in infant formula and follow-on formula section.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Point of sale material was removed immediately. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
24	April	<i>Interaction with General Public</i>	Point of sale material for different product was located in infant formula and follow-on formula section.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such point of sale material is not permitted, and the materials were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
25	April	<i>Interaction with General Public</i>	Promotion of infant formula and follow-on formula using a point of sale material at retail level.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such point of sale material is not permitted, and the materials were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
26	April	<i>Information and Education Materials</i>	Promotion of infant formula through materials intended for HCPs.	In line with our Policy, infant formula should not be promoted or advertised.	HCP was informed immediately that the material was not permitted to be openly displayed. Re-iterated to the HCP our commitments and the importance of compliance to our Policy.	ASPAME
27	April	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
28	May	<i>Interaction with General Public</i>	Promotion of infant formula through discounted price in pharmacy.	In line with our Policy, infant formula should not be promoted or advertised.	The promotion was stopped immediately. Re-iterated to the pharmacy our commitments and the importance of compliance to our Policy.	ASPAME

29	May	<i>Interaction with General Public</i>	Promotion of follow-on formula using a special display in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
30	May	<i>Interaction with General Public</i>	Promotion of infant formula using a special display in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
31	May	<i>Interaction with General Public</i>	Promotion of infant formula using a special display in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
32	May	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
33	May	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
34	June	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
35	June	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America

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36	June	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
37	June	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
38	June	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
39	June	Information and Education Materials	Promotion by displaying pictures of infants below 6 months of age linked to infant formula.	In line with our Policy, pictures of infants less than 6 months should not be displayed.	The material was removed immediately by the retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
40	June	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
41	June	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
42	July	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe

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43	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
44	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
45	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
46	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula and follow-on formula in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
47	July	<i>Interaction with General Public</i>	Online promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
48	July	<i>Interaction with General Public</i>	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Advertisement was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
49	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>

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50	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
51	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
52	July	<i>Interaction with General Public</i>	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
53	July	<i>Interaction with General Public</i>	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
54	July	<i>Interaction with General Public</i>	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
55	August	<i>Interaction with General Public</i>	Point of sale material for different product was located in infant formula and follow-on formula section.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such point of sale material is not permitted, and the materials were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>ASPAME</i>
56	August	<i>Interaction with General Public</i>	Promotion of infant formula and follow-on formula using a special display in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>ASPAME</i>

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57	August	Interaction with General Public	Promotion of follow-on formula by offering a gimmick with the purchase of a product.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such practice is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
58	August	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
59	August	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
60	August	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
61	August	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
62	August	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
63	August	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to	Latin America

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64	August	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
65	September	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
66	September	Interaction with General Public	Promotion of infant formula and follow-on formula using a special display in retail outlet.	In line with our Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
67	September	Interaction with General Public	Promotion of infant formula via e-mail.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the e-mailing was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
68	September	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
69	September	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America

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70	September	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
71	September	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
72	September	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
73	September	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
74	September	Interaction with General Public	Promotion of infant formula on social media.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
75	October	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
76	October	Interaction with General Public	Online promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to	Latin America

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					the retailer our commitments and the importance of compliance to our Policy.	
77	October	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
78	October	Interaction with General Public	Promotion through discounted price of follow-on formula in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
79	October	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
80	October	Interaction with General Public	Online promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
81	October	Interaction with General Public	Promotion through discounted price of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
82	October	Interaction with General Public	Promotion of follow-on formula using a special display in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
83	November	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to	Latin America

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					the retailer our commitments and the importance of compliance to our Policy.	
84	November	Interaction with General Public	Promotion through discounted price of follow-on formula in retail outlet.	In line with our Policy, follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by retailer. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
85	November	Interaction with General Public	Promotion of infant formula using a point of sale material at retail level.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such point of sale material is not permitted, and the materials were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
86	November	Interaction with General Public	Promotion of infant formula using a special display in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	ASPAME
87	November	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Europe
88	December	Interaction with General Public	Online promotion of infant formula.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America
89	December	Interaction with General Public	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	Latin America

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90	December	<i>Interaction with General Public</i>	Promotion of infant formula in retail outlet.	In line with our Policy, infant formula should not be promoted or advertised.	Retailer was informed immediately that such promotion is not permitted, and the promotion was stopped. Re-iterated to the retailer our commitments and the importance of compliance to our Policy.	<i>Latin America</i>
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