



DANONE COMMUNICATION VALIDATION MANAGEMENT POLICY

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Approver(s): General Secretary, Chief R&I, Quality & Food Safety Officer

EFFECTIVE DATE & PRIOR COMMITMENTS: This Policy is effective from the publication date.

THIS POLICY COMPLEMENTS OUR: Danone Policy on Nutritional Profiles for the Use of Health and Nutrition Claims

POLICY DIRECTORY: All Danone Policies and Positions can be found on [Danone.com](https://www.danone.com)

DANONE COMMUNICATION VALIDATION MANAGEMENT (CVM) POLICY

VALIDATION OF PRODUCT AND CATEGORY RELATED COMMUNICATIONS

Section A – Context and Objectives

This policy is designed to ensure compliant, responsible, credible, and accurate communications for Danone products and categories with the aim to secure and strengthen Danone brand equity and portfolio of brands and assets.

The policy embraces:

- our unique heritage of social and environmental responsibility
- our sustainability strategy, The Danone Impact Journey
- the numerous and varied communication channels

The Danone CVM Policy enables Danone Country Business Units (CBUs) to develop materials that are locally relevant and compliant with regulations, Danone social and environmental objectives, and any codes of good practices and ethics, while benefiting from global expertise and alignment with the brands, categories, and company strategy. Where no local regulation exists or is less strict than CODEX Alimentarius standards, it complies with the latter.^{1,2}

Section B – Scope

This policy concerns:

1. In terms of documents: all product and category related communications which are aimed at the public, consumers, patients, carers, healthcare professionals³ or retailers, where a Danone brand is mentioned or implied, including but not limited to:
 - packaging, labels, TV and radio commercials, brochures, coupons, infomercials, or advertorials, press documents/corporate communication, content intended for websites, social media.
 - collective advertising and promotional campaigns.
 - trademarks and other trade names that may be interpreted as nutrition or health claims or overall imply a function or a benefit.
2. In terms of content: any materials containing references to health, nutrition, sustainability and/or “valorization ⁽⁴⁾” claims/messages related to products sold under brands owned by Danone and services proposed by Danone and its affiliated companies.
3. In terms of entities/teams:
 - CBUs
 - Zones and Global innovation processes
 - Global teams (Marketing, Sales, Sustainability, Corporate communications...)
 - Danone R&I Centers

¹ CAC/GL 1-1979 CODEX General guidelines on claims

² CAC/GL 23-1997 CODEX General guidelines for use of nutrition and health claims.

³ Non-product related communications, e.g., Health care professional’s communications must always also undergo scientific review and validation.

⁴ “Valorization claims” means any message or representation, not directly referring to health nor to nutrition benefits but which states, suggests, or implies that a Danone product or its ingredients have differentiating characteristics.

Section C – General Principles

1. The GM of the CBU must appoint a Communication Validation Manager (“local CVM”), in agreement with the SVP General Counsel.
2. At Global level, Category CVMs are appointed by the SVP General Counsel.
3. The Communication Validation Managers – both at Local and Global level – must ensure that a process is in place to validate the communications in the scope of this Policy. This process shall include the creation of a validation team, comprising at a minimum:
 - when appropriate, a representative responsible for “Science and/or Nutrition” (from R&I and/or Health related functions to ensure scientific substantiation, truthfulness and scientific credibility of the communications and health or nutrition claims and relevant product profile);
 - when appropriate, a representative responsible for “public opinion/reputation” (from Communication and/or Public Affairs and/or General Counsel teams to assess and mitigate potential media and public opinion impact and compliance with all relevant commitments and Breast Milk Substitutes (BMS) Policy);
 - when appropriate, a representative of the Sustainability team to ensure proper substantiation, truthfulness and credibility of environmental/green claims, nature and planet communications and compliance with all relevant Danone commitments;
 - representative(s) responsible for Regulatory Affairs and/or Legal or Compliance to ensure regulatory and legal compliance, respect of internal rules and policies, self-regulation advice, codes of business conduct and Codex Standards;
 - when necessary, the team can be expanded with the addition of experts/managers from other functions required to properly assess the matter at hand, including the project owner.

Section D – Rules applicable to communications

1. Communications shall be compliant with applicable laws and regulations, and any concerned codes of good practices and ethics or, where no local regulation exists or is less strict than CODEX Alimentarius standards, to comply with the latter^{5,6}.
2. Claims must be scientifically substantiated following Codex Alimentarius Standards^{7,8}.
3. Communications shall be expressed clearly and unambiguously and shall not be misleading nor vague.
4. Communications shall be consistent with the image of the Brand concerned and that of Danone.
5. Communications shall be in line with the applicable Danone policies and commitments.
6. In certain circumstances, additional restrictions shall apply, for example:
 - for communications aimed at children over the age of 3 years, Danone's specific commitments in this field (notably the Danone Pledge on Marketing to Children);

⁷ CAC/GL 1-1979 CODEX General guidelines on claims

⁸ CAC/GL 23-1997 CODEX General guidelines for use of nutrition and health claims.

- for communications on breast milk substitutes, the principles of the Danone Policy for the Marketing of Breast-Milk Substitutes⁹;
- for direct-to-patient or direct-to-consumer communications of foods for special medical purposes/medical nutrition products.

Section F – Implementation

The General Managers and the Communications Validation Managers of all CBU and Global teams are responsible for the enforcement of this Policy.

⁹ [Danone Policy for the Marketing of Breast Milk Substitutes](#)