



DANONE
ONE PLANET. ONE HEALTH

Raising the bar:
**RESPONSIBLE
MARKETING** of
baby formula

REPORT 2020

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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. In early life, the right nutrition during a baby's first 1,000 days is crucial for their lifelong health and wellbeing, and we're focused on giving them the best possible nutritional start in life.

We know breast milk is the best nutrition for a baby, and like the World Health Organization (WHO) we believe that breastfeeding must be protected and promoted. As a leading provider of baby formula, we have an important role to play in supporting this goal and championing responsible and ethical formula marketing practices.

Parents place their trust in us and we aim to repay that trust by ensuring that every one of them feels supported with truthful, science-based information about nutrition products for their child, and by providing them with this information in a responsible, transparent and open way.

The way we see it, we can do more than committing to the responsible marketing of baby formula as outlined in our breast-milk substitute (BMS) marketing policy. Transparency about our progress in implementing them and acknowledging areas of improvement is an equally important part of our journey to do more in the responsible marketing of formula - every year and everywhere we operate.

It's the reason we publish this report each year, to raise the bar for ourselves and the entire industry with a rigorous and transparent approach to continuous improvement of our formula marketing practices based on internal and external monitoring. This report summarizes the progress we made in 2020 in implementing our strict global BMS policy and provides an overview of instances of non-compliance with our BMS Policy that are attributable to Danone, our partners and other third parties with whom we work. We also share the steps that we're taking to ensure we address these examples of non-compliance with our BMS Policy and improve our marketing practices.

We work hard to raise the bar in responsible formula marketing. We are and so far the only company to implement a strict worldwide policy that prohibits advertising, promotion of sampling of infant formula

for children aged 0-6 months, anywhere in the world, even if permitted by local laws. Further to independent audits conducted in 2020, Danone for the second time in a row, ranked number one in the ATNI Global Index for the Marketing of Breast Milk Substitutes with our management systems considered to be the strongest of those evaluated. In 2020 we were only 1 of 3 breast milk substitute manufacturers re-certified as a constituent member of the FTSE4Good Index Series, a global responsible investment index series.


As an *Entreprise à Mission* or purpose-driven company dedicated to positively impacting health we work to protect, promote and support breastfeeding to improve infant and maternal nutrition everywhere we operate. We are committed to doing so in a fair and transparent manner working closely with our partners. We might not get everything right all the time but we're committed to continuous improvement and ensuring accountability for our actions.

It's why I am proud to share this progress report today, a summary of what we learned in 2020 as we continue to raise the bar for the responsible marketing of baby formula.

July 2021



**JEAN-MARC
MAGNAUDET,**
President Specialized
Nutrition Unit



6,387 Danone employees were trained in 2020 on the WHO Code and the Danone Policy for the Marketing of Breast-Milk Substitutes.

How we're raising the bar in the INDUSTRY

Industry-leading policy

At the heart of our approach is a commitment to protecting breastfeeding in line with the aims of the World Health Organization's 1981 Code for the Marketing of Breast-Milk Substitutes and subsequent relevant WHA resolutions, also known as the WHO Code.

Danone is and so far the only company not to 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), to help encourage breastfeeding. Danone's policy for the Marketing of Breast-Milk Substitutes (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.

The BMS Policy spells out which baby formula products the policy applies to – these products are referred to as 'Covered Products'. Our BMS Policy prohibits the promotion and advertising of Covered Products to the general public.

Worldwide, these products include Infant Formula for babies 0-6 months, other food or beverages for infants up to six months of age, delivery products like bottles and teats.

Additionally, we have voluntarily extended our BMS Policy to follow on formulas for babies aged 6 to 12 months in parts of the world where infant health is most at risk (Higher Risk Countries as classified by the [FTSE4Good BMS Criteria](#)) to help encourage breastfeeding.

In these countries, beyond the products listed above, Covered Products include Follow-on Formula for babies from 6-12 months and Complementary Foods and drinks for babies under 6 months of age.

WE'RE CONVINCED THAT BUSINESS CAN BE A FORCE A GOOD, AND THAT WE CAN CREATE AND SHARE SUSTAINABLE VALUE FOR ALL WHILE WE DELIVER ON OUR BUSINESS AND FINANCIAL AGENDA. OUR APPROACH TO ETHICAL MARKETING OF BABY FORMULA ENABLES US TO SUPPORT PARENTS WITH HIGH QUALITY NUTRITION FOR THEIR BABIES WHEN BREASTFEEDING IS NOT AN OPTION FOR THEM.



WORLDWIDE POLICY WITH WHO CODE AT THE HEART with respect for local laws and regulations



GLOBAL IMPLEMENTATION SUPPORT AND OVERSIGHT with clear individual accountability in markets



CONSTANT MONITORING FOR IMPROVEMENT with external verification to ensure independent evaluation and assessment of our approach

Our people set the standard

Responsible marketing of baby formula is embedded in our business practices and our employees (or «Danoners») set the standard. From the day people involved in Danone's baby formula portfolio join the company they sign a commitment statement they will *respect our strict worldwide Policy for the Marketing of Breast-Milk Substitutes that protects and promotes breastfeeding*. Our employees receive regular training about the importance of protecting and promoting breastfeeding for better infant and maternal health and on how to implement Danone's BMS Policy in this area. The objective of this training and awareness program is to embed our industry-leading approach as a core part of our business practices across all teams and provide consistent, clear and transparent guidance to all Danoners working in the category.

Beyond responsible marketing, Danone supports employees to promote and encourage breastfeeding. Lactation rooms are available in offices with more than 50 people and we also have job-protection policies, flexible working hours and return-to-work programmes that support the different needs of parents and caregivers.

Our Global Parental Policy lays out the ways in which Danone ensures employees are fully supported during pregnancy, during their child's first 1,000 days and during the transition back to work. The policy applies globally, whether they be mother, father, adoptive parent or any other caregiver.

Equipping our partners to fulfill their role

We have a duty to promote and advocate responsible business practices across our value chain and partnerships. This is why 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, such as retailers and pharmacies to familiarize themselves with and implement responsible formula marketing practices according to our strict worldwide BMS Policy. We want to do everything we can to ensure everyone we work with – Danoners, our partners and other non-contracted third parties - is equipped with the information and training they need to take responsibility for their role in ensuring the proper marketing, distribution and use of baby formula in order to protect and promote breastfeeding. We consider that it is equally important to track and report compliance of our business partners with our ethical marketing standards so that we can monitor key progress as well as gaps in our ecosystems.

DANONE ETHICS LINE

We appreciate feedback and getting things brought to our attention if there's ever a situation where it looks like we did not do enough to protect breastfeeding and promote its benefits. We always look into it through internal investigations – we take this really seriously. The Danone Ethics Line is a website that enables everyone, from employees to third parties, to report potential non-compliance anonymously. It includes a specific section to report any concern on compliance with our BMS Policy. 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 a number of authorized employees at Danone's head office in Paris. Every issue raised is then investigated and appropriate action taken if non-compliance is found.

www.danoneethicsline.com

Science and facts at the heart of our engagement with healthcare professionals

Healthcare professionals are best placed to help parents with questions about feeding their little one and that's why parents often turn to them for guidance about their child's nutrition. The WHO Code recognizes the value of scientific and factual dialogue between manufacturers of baby formula and healthcare professionals*. Our scientists and research initiatives have furthered understanding of the composition and properties of breast milk for over 50 years and we have gained significant expertise in this area. When we talk with healthcare professionals, it's on scientific and factual grounds, with the aim of sharing knowledge and advancing innovation on infant nutrition and maternal health.

The strict ethical standards that govern our interactions with the global healthcare community are anchored in our [Healthcare Systems Compliance Policy](#)



Engaging with parents responsibly

We think it's important to contribute to creating an environment where all parents feel informed and supported to make their own choices regardless of their circumstances or feeding choices. Social media is now a common platform to connect and engage with people, and we believe we need to be on these platforms to answer parents' questions about our products and to share factual information about child nutrition. When we engage with parents on social media, we always respect local law relating to marketing and promotion of formula. We never promote or advertise formula for babies of 0-6 months in any way, even if permitted by local law. Furthermore we are transparent about our sponsored content and posts.

In our communications with parents we are always clear that breast milk is the best source of nutrition for babies.

*Article 72, International Code of Marketing of Breast-milk Substitutes, WHO, 1981 https://www.who.int/nutrition/publications/code_english.pdf. *Information provided by manufacturers and distributors to health professionals regarding products within the scope of this Code should be restricted to scientific and factual matters, and such information should not imply or create a belief that bottle-feeding is equivalent or superior to breast-feeding.

Delivering on our commitment to responsible marketing of **BABY FORMULA**

OUR COMMITMENT TO PROTECTING AND PROMOTING BREASTFEEDING IS AT THE HEART OF OUR BMS POLICY AND FUNDAMENTAL TO OUR WORK. 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 have put in place a simple but robust process, which starts with education and training. With a comprehensive onboarding process, E-learning modules (introduction and in-depth) and regular training, Danoners working in our formula business are given a thorough grounding in the standards we have set.



EQUIP

With the support of our Early Life Product Compliance Committee, comprised of senior leadership and subject matter experts, our network of "BMS compliance" leads are responsible for local implementation and compliance with our BMS Policy. To ensure everyone has the resources and guidance they need, we have developed a detailed system of country manuals and assets to support compliance with our BMS Policy, supported by a comprehensive internal awareness and communication program targeting relevant employees.



MONITOR

Regular internal assessments, either through audits, testings or self assessments, reporting and verification processes ensure that we keep ourselves focused on the importance of compliance with our BMS Policy and on finding ways to continually improve how we operate in this area.



EXTERNAL ASSESSMENTS

We rigorously monitor, report and review our own efforts, but to ensure our approach is as robust as possible, we also work with qualified, external, third party experts to provide an independent assessment on how we're doing. Working with Bureau Veritas, ATNI & FTSE4Good, we are able to get valuable external perspective on what's working well and what can be improved.



REPORT

We're serious about having a positive impact and we're always trying to do better, but we recognize there is always more we can do, which is why proactively reporting and publishing our progress in implementing our BMS Policy is so important. With processes to identify gaps and propose improvements, we make sure any lessons learned are incorporated into our constantly evolving approach.



IMPROVE AND REPEAT

When it comes to compliance, the job is never complete, which is why consider our policies and procedures as a work in progress. Supported by continuous communication and a culture of learning and incremental improvement, we strive to ensure our learnings are reflected back in our education and training, starting the cycle again.



We are committed to openly and transparently sharing our compliance with our BMS Policy and we are focused on ensuring continued accountability for our actions. This report provides an overview of instances of non-compliance attributable to Danone, our contractual partners other non-contracted third parties with whom we work, as well as the steps we are taking to ensure we are always learning and improving.

To impact the industry at scale we do not limit our reporting to alleged instances of non-compliance attributable to Danone and contracted partners (e.g. exclusive distributors) but we also report on other non-contracted third parties like retailers.

Because we believe we have a role to play in raising awareness of importance of responsible marketing of baby formula as widely as we can working with retailers, e-commerce & pharmacies.

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.

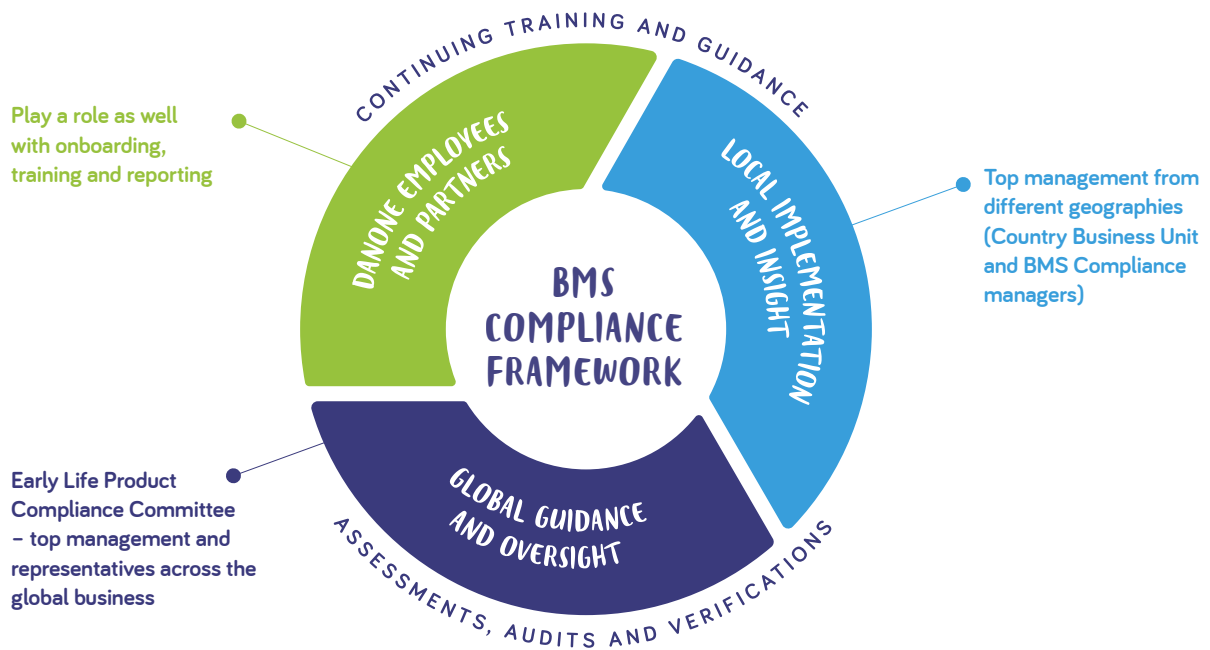
We review compliance with our BMS Policy related to:

- Interaction with General Public
- Interaction with Health Workers
- Labelling of Covered Products
- Information and Education Materials

Substantiated allegations are then further classified as either:

- Actions conducted by Danone (including all subsidiary companies and contracted partners)
- Actions conducted by non-contracted third parties such as independent retailers or pharmacies

We receive allegations either via internal monitoring, external allegations (e.g. media & NGOs) or the Danone Ethics Line and External Verifications. In our 2020 report we also specify the sources of the allegations



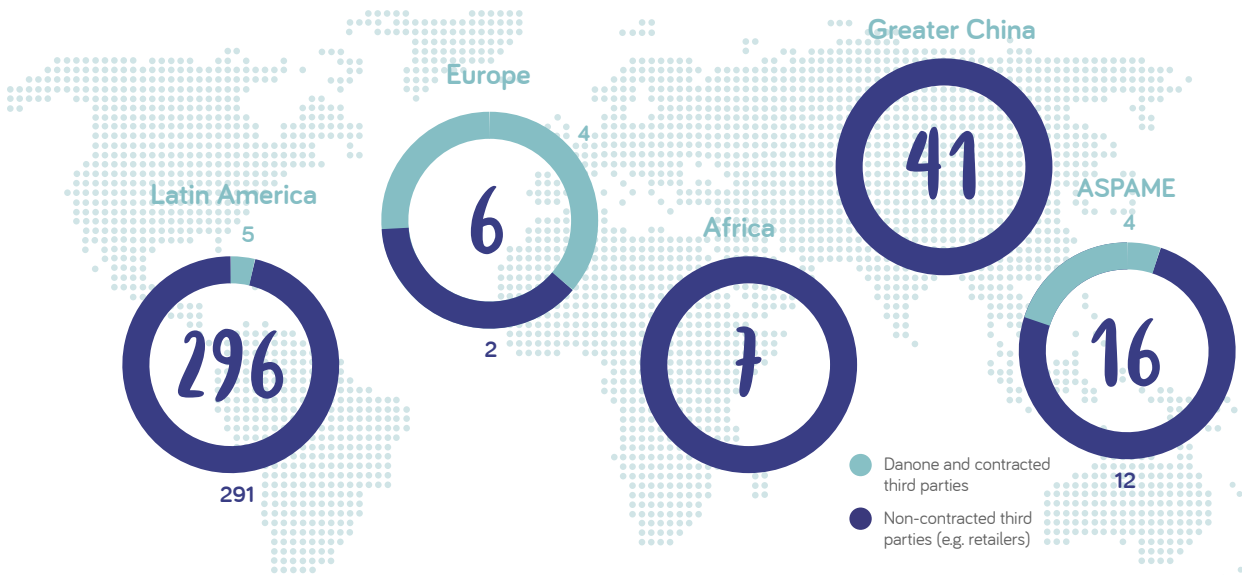
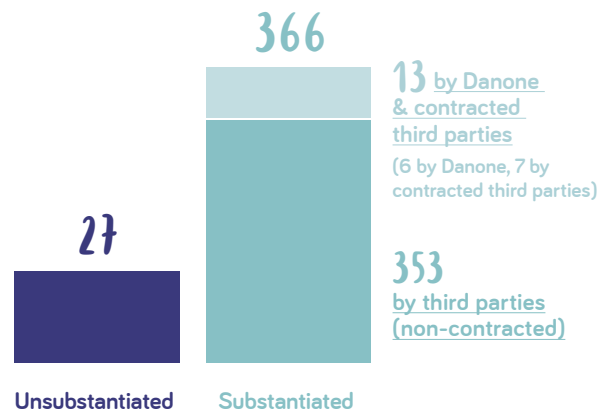
Our 2020 PERFORMANCE

Publishing this report is an evolving process and we are committed to continuously improving our monitoring and reporting approach. As part of this evolution, we continuously focus on raising greater awareness of the BMS Policy – both among employees, our contracted business partners and other non-contracted third parties (e.g. retailers) – and to encourage them to flag any potential situations that do not comply with the BMS Policy. As a result, our 2020 report sees a higher number of reported allegations than last year due to a deeper review of non-contracted third party conducts in focused geographies. We now have an even better view of what’s happening to take further steps to improve our approach and ensure better compliance with our BMS Policy from everyone.

We receive allegations in a number of different ways and review all facts before an allegation is considered as substantiated or unsubstantiated.

An analysis of substantiated allegations (related to either our own actions actions, those of our contracted business partners or other non-contracted third parties)

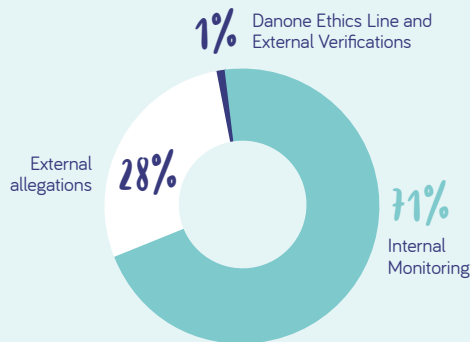
is included in the Appendix. In summary, for the period 1 January to 31 December 2020, we had 366 substantiated allegations across our markets which constitute an incident of non-compliance as defined by our BMS Policy or local regulations. We also received 27 unsubstantiated allegations, for which there was no evidence of violations of our BMS Policy or local regulations.



WHERE DID THE SUBSTANTIATED ALLEGATIONS TAKE PLACE

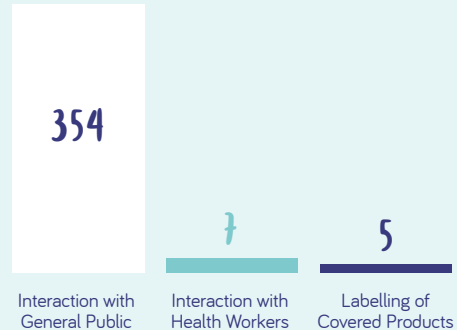
Due to the proactive approach in Brazil for monitoring compliance with our BMS Policy via a specialized external agency, there has been an increase in the allegations found in Latin America versus 2019 (296 vs 54). In Greater China there has been an increase as well, from 0 in 2019 cases to 41 in 2020, also due to the improved monitoring in this region. Africa had a minor increase from 1 case in 2019 to 7 cases in 2020. In Asia Pacific and Middle East as well as in Europe there has been a slight decrease in cases; from 40 to 16 and 11 to 6 respectively.

ALLEGATIONS 2020



WHERE DID THE SUBSTANTIATED ALLEGATIONS COME FROM

The great majority of the cases was detected through internal monitoring of our and third party e-commerce platforms and social media through a specialized agency. With our strong governance and global implementation of the BMS Policy, we continuously raise internal awareness of monitoring our actions closely and flag allegations as soon as possible.



WHAT KIND OF SUBSTANTIATED ALLEGATIONS WERE RECEIVED

Of all substantiated allegations, the significant majority was found to be in relation to interactions with the general public (97%). There were only a few instances of non-compliance with health workers (2%) and labels of Covered Products (1%).

RAISING THE BAR IN RESPONSIBLE MARKETING IN BRAZIL

In 2020 Danone Brazil started monitoring its marketing practices and those of third parties more closely to ensure compliance with our BMS Policy. The proactive monitoring enabled the local team to address when Danone or third parties did not do enough to protect breastfeeding. Because the monitoring was carried out with a specialized external agency, it was possible to track several cases and take timely appropriate action.

External verifications by Bureau Veritas

For our 2020 report, Bureau Veritas, an external auditor, undertook audits in the United Arab Emirates (UAE), Panama and Algeria. We selected these countries based on the following:

- Infant malnutrition and mortality rates in the country
- Business practices prevalent in the market itself
- Broad geographical representation
- A rotation basis to ensure different countries are audited every year

In order to assess our level of compliance with our strict BMS Policy in these countries, Bureau Veritas conducted interviews and reviewed documents within Danone and our distributors. Due to COVID-19, these interviews were conducted remotely. They also visited retail outlets in which our products are sold and interviewed healthcare professionals with whom we work. To avoid the risk of bias, the auditors did not disclose that Danone was the manufacturer being assessed.

In these three countries, the audits found areas of best practice. These findings included (among others):

- Well-established and documented internal review process for the approval of any marketing activities, materials, and information in UAE.
- Supporting documentation was comprehensive and readily available in Panama.
- Training attendance records are well maintained in Algeria.

However, there were also areas where we found that we can do better, and we have identified corrective action to rectify these issues. The three country statements can be found on www.danone.com.

UNITED ARAB EMIRATES

NON-CONFORMANCE	ACTION
<p>Examples were identified where information and educational material had not been fully reviewed by local regulators before use in the market. Lack of clarity around the appointment and scope of department(s) in charge of conducting these reviews.</p>	<p>➔ Danone to clarify review process with authorities and through external law firms to ensure proper compliance.</p>
<p>Promotion of Stage 3 products overlaps with the Covered Product definition under local regulation.</p>	<p>➔ Danone to monitor implementation of local regulations and address potential gaps.</p>
<p>The local business unit responded to requests from authorities to sponsor some scientific seminars and events, providing support to the organizers directly which may contradict with local regulations.</p>	<p>➔ Danone to continue ensuring no financial support is paid to healthcare professionals for scientific seminars and events.</p>
<p>One instance was found where a covered product was wrongly promoted to the general public online by an online retailer, however no evidence suggested the discount was done at the request of Danone.</p>	<p>➔ The discount was removed. The local business unit will continue to monitor online stores to ensure no similar discounts appear and Danone has reminded all retailers of the policy requirements in this area.</p>

PANAMA

NON-CONFORMANCE	ACTION
<p>It was found that local partners had distributed a higher number of the product samples available for professional evaluation (PPE) – those used to introduce an existing range of product to a new HCP, to introduce a new product/label to an HCP or to introduce a new recipe to HCP – than Danone’s policy allows.</p>	<p>➔ The practice has been stopped and brought into line with the global policy of two Products for Professional Evaluation per healthcare professional only.</p>
<p>Following a number of thefts one local retailer placed some Covered Products into a protected cabinet, inadvertently displaying them more prominently and infringing on our Policy’s restricting guidance related to ‘special displays’ for such products.</p>	<p>➔ Danone is working closely with retail partners to ensure the BMS policy is fully understood with the aim to avoid any confusion about guidance on product positioning within stores.</p>

ALGERIA

NON-CONFORMANCE	ACTION
<p>One local team member was found to have an incentive technically linked to the sale of Covered Products, against Danone policy.</p>	<p>➔ This instance was reviewed and the incentives in place are now compliant with global policy.</p>
<p>Two instances were found of products wrongly discounted in store. No evidence was found to suggest this was done at the request of the local business unit however.</p>	<p>➔ The discounts were removed, the local business unit continues to monitor stores online and Danone has reminded all retailers of the policy requirements in this area.</p>
<p>From 44 locations visited, one instance of improper Placement of Point-of-Sale Material (POSM) was found.</p>	<p>➔ The correct policy was in place but not executed properly. Danone has reminded all retailers of the policy requirements in this area.</p>

• Our plan to keep IMPROVING

An independent committee made of external qualified experts will now review and challenge the company's roadmap and progress towards these objectives which include impacting people's health locally. This step is fully consistent with Danone's global ambition to become a certified B Corporation by 2025, showing our long-term commitment to sustainable business and to high standards of societal and environmental performance.

We are proud both to promote and protect breastfeeding and to provide parents with a safe, quality option if breastfeeding is not an option. We welcome the external recognition of our work so far to champion and implement responsible and ethical marketing, with the number 1 ranking for the marketing of Breast-Milk Substitutes in the ATNI Global BMS/CF Marketing Index, and our inclusion in the FTSE4Good Index Series. And we are committed to challenging ourselves to keep doing more.

Together with the UN and civil society organizations we share a clear objective to improve infant and maternal nutrition and health. That is why in **our response** to the 2020 Breast-Milk Substitutes Call to Action we outlined what we believe is needed to pursue full compliance with the International Code of Marketing of Breast-Milk Substitutes with our partners in our ecosystem by 2030.

We have set out the next steps we will take towards this goal unilaterally, as well as those we would need to take as part of an industry-wide move to support the adoption and implementation of national legislation fully aligned with the Code.

This includes a commitment to increase product packaging differentiation to avoid cross-promotion. Starting in 2021, we will review and develop new packaging principles and we will make progressive moves towards full implementation globally by 2025. There are also plans underway to develop a new certification program for our Health Care Nutrition advisors with implementation starting in 2022.

ON 26 JUNE 2020, DANONE BECAME AN "ENTREPRISE À MISSION", ADOPTING A LEGAL FRAMEWORK PUTTING PURPOSE OF BRINGING HEALTH THROUGH FOOD TO AS MANY PEOPLE AS POSSIBLE AT THE HEART OF OUR COMPANY, AND STRENGTHENING GOVERNANCE TO OVERSEE PROGRESS TOWARDS OUR SOCIAL, SOCIETAL AND ENVIRONMENTAL OBJECTIVES ALIGNED WITH THE UNITED NATIONS' SUSTAINABLE DEVELOPMENT GOALS.

We will also take action to ensure greater transparency and openness in our relationships and engagement with healthcare professionals, with the launch of an independent education platform for healthcare professionals. The WHO Code recognizes the value of scientific and factual dialogue between baby formula manufacturers and healthcare professionals. We believe that Danone can perform a valuable contribution to advancing the field of nutrition through this engagement and it is vital to our ability to meet new health needs. In order to enhance the trainings to our employees on how to responsibly engage with healthcare professionals and what we can and cannot do in relation to the marketing of baby formula, we have started to globally roll out new e-learning in 2021.

At Danone, we think it's possible to be a business and a good global citizen. We are working hard to be a successful business that is socially responsible and operates sustainably. We know there's more that can be done and that's why we have a plan in place to deliver on our commitments and ensure we continue to challenge ourselves to keep improving.



APPENDIX: SUBSTANTIATED ALLEGATIONS CONCERNING ACTIVITIES BY DANONE (INCLUDING CONTRACTED THIRD PARTIES E.G. EXCLUSIVE DISTRIBUTORS)

MONTH	CATEGORY	SUMMARY OF ALLEGATION	COMMENTS	SUMMARY CORRECTIVE ACTIONS	REGION
February	Interaction with General Public	Brand name displayed in a post on social media.	In line with our BMS Policy, infant formula brand names should not be advertised or promoted.	The post was removed immediately.	Europe
March	Interaction with Health Workers	Procedures on interactions with HCPs not fully followed.	In line with our BMS 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 distributor our commitments and the importance of compliance to our BMS Policy.	Latin America
March	Interaction with Health Workers	HCS procedure for Events was not fully followed.	In line with our BMS Policy, 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 distributor our commitments and the importance of compliance to our BMS Policy.	Latin America
March	Interaction with Health Workers	Incentives to employees on covered products.	In line with our BMS Policy, Bonus or incentive calculations for Danone Employees do not include volume or value targets or quotas set specifically for covered products.	The distributor changed the incentives to a bonus based on overall sales of products marketed by Danone.	Latin America
March	Interaction with Health Workers	More than 2 PPE of Covered Products are given to HCPs.	In line with our BMS Policy and local regulations, only 2 PPE may be given to HCPs to evaluate the (new) product.	The amount of Personal Protective Equipment (PPE) is now strictly limited to 2 by the distributor. Re-iterated our commitments and the importance of compliance to our BMS Policy.	Latin America
April	Interaction with General Public	Point of Sale (POS) materials in retail outlet located with covered products.	In line with our BMS Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	POS materials were removed.	ASPAME

MONTH	CATEGORY	SUMMARY OF ALLEGATION	COMMENTS	SUMMARY CORRECTIVE ACTIONS	REGION
July	Labelling of Covered Products	Approval code on label expired.	In line with our BMS Policy and local regulations, there should be a valid approval code on each covered product label.	With high focus of all functions, the product has been relaunched and the old product phased out.	ASPAME
July	Interaction with General Public	Baby food for 4-6 months old infants were promoted in a catalogue.	In line with our BMS Policy, complementary food for infants less than 6 months should not be promoted or advertised.	Promotion was stopped by distributor. Re-iterated our commitments and the importance of compliance to our BMS Policy.	Europe
August	Interaction with General Public	Shopping campaigns on social media included covered products.	In line with our BMS Policy, infant formula should not be promoted or advertised.	The shopping campaigns were re-structured to select the right products. The agency has been updated every time a product page changes prevent unexpected issues.	ASPAME
October	Interaction with General Public	A branded video was released on social media released without a stage indication.	In line with our BMS Policy, infant formula brand names should not be advertised or promoted.	The video was taken down immediately. Re-iterated our commitments and the importance of compliance to our BMS Policy.	ASPAME
October	Interaction with General Public	A branded face mask was found in a hospital.	In line with our BMS Policy, infant formula brand names should not be advertised or promoted.	Production and distribution of the face masks were stopped by the distributor. Re-iterated our commitments and the importance of compliance to our BMS Policy.	Europe
November	Interaction with General Public	Branded internal communication on a loyalty program.	In line with our BMS Policy, infant formula brand names should not be advertised or promoted.	The communication was adjusted and the stand-alone brand name was replaced.	Europe
December	Interaction with Health Workers	More than 2 PPE of Covered Products given to HCPs.	In line with our BMS Policy and local regulations, only 2 PPE may be given to HCPs to evaluate the (new) product.	The amount of PPE is now strictly limited to 2 by the distributor. Re-iterated our commitments and the importance of compliance to our BMS Policy.	Latin America

SUBSTANTIATED ALLEGATIONS CONCERNING ACTIVITIES BY NON-CONTRACTED THIRD PARTIES

NUMBER OF ALLEGATIONS	CATEGORY	SUMMARY OF ALLEGATION	COMMENTS	SUMMARY CORRECTIVE ACTIONS
26	Interaction with General Public	Promotion of infant formula and follow-on formula using point of sale material.	In line with our BMS Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Third party was informed immediately that such point of sale material is not permitted, and the materials were removed. Re-iterated to the third party our commitments and the importance of compliance to our BMS Policy.
69	Interaction with General Public	Promotion through discounted price of infant formula and follow-on formula in retail outlet and e-commerce.	In line with our BMS Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Discounted price was adjusted immediately by third party. Re-iterated to the third party our commitments and the importance of compliance to our BMS Policy.
4	Interaction with General Public	Promotion of infant formula and follow-on formula using a special display.	In line with our BMS Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Third party was informed immediately that such special display is not permitted, and the products were removed. Re-iterated to the third party our commitments and the importance of compliance to our BMS Policy.
204	Interaction with General Public	Promotion of infant formula and follow-on formula on social media.	In line with our BMS Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Third party was informed immediately that such advertising is not permitted, and the published post was removed. Re-iterated to the third party our commitments and the importance of compliance to our BMS Policy.
47	Interaction with General Public	Promotion of infant formula and follow-on formula in (digital) advertising materials.	In line with our BMS Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Third party was informed immediately that such advertising is not permitted, and the advertisement was stopped/ removed. Re-iterated to the third party our commitments and the importance of compliance to our BMS Policy.
3	Interaction with General Public	Promotion of infant formula and follow-on formula by giving a gift with every purchase.	In line with our BMS Policy, infant formula and follow-on formula, in Higher Risk Countries, should not be promoted or advertised.	Third party was informed immediately that such promotion is not permitted, and the gift was removed. Re-iterated to the third party our commitments and the importance of compliance to our BMS Policy.



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ONE PLANET. ONE HEALTH