

Dabur India Limited ¹

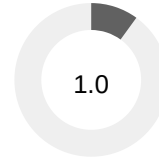
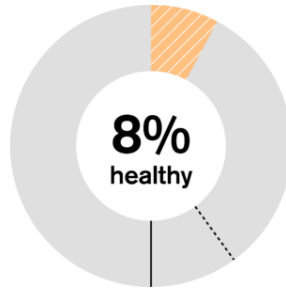
Product categories assessed
Confectionery|Sauces, Dips and
Condiments|Juice|Sweet Spreads

Percentage of company India sales
covered by Product Profile assessment
90-100 %

Headquarters
India

Type of ownership
Public

Euromonitor International Limited [2021]
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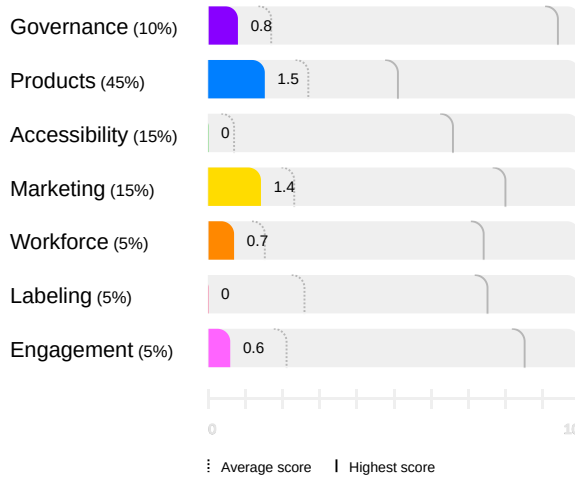
Corporate profile score

²

Important

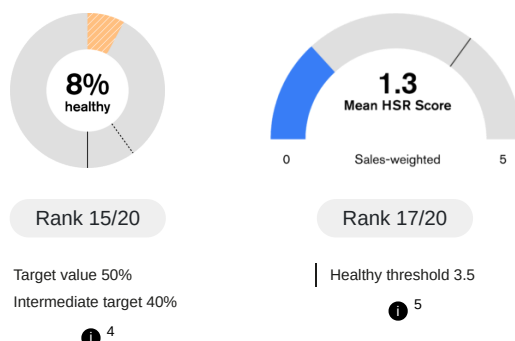
The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

SCORING OVERVIEW



(%) Figure in brackets is the weighting of the category. All category and criteria scores are out of 10.

PRODUCT PROFILE ³



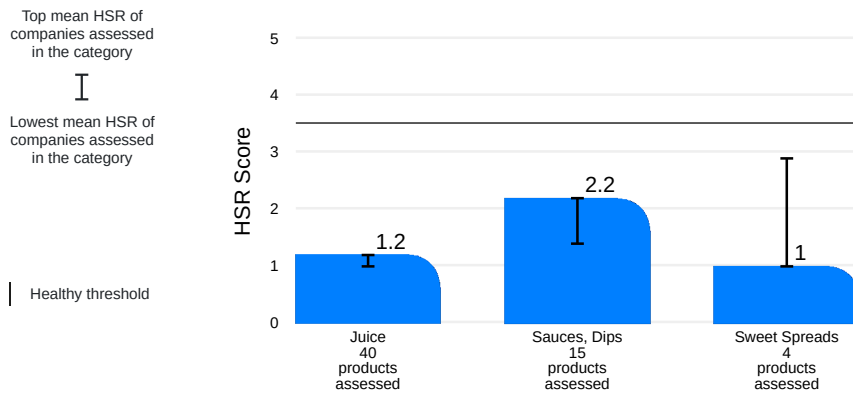
The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. The underlying nutrient profile model assesses nutrients of concern (sodium, total sugar, saturated fat, and overall energy) and positive food components/ nutrients (fruit and vegetable content, protein, fiber, and, in some cases, calcium) to score products on the basis of nutritional composition per 100g or 100mL. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthier. Product Profile results account for 30% of the total Index score.

Portfolio-level Results

Total no. products assessed	Range of total 2021 company sales in India ⁶	Sales-weighted Mean HSR (out of 5 stars)	Products meeting the 'healthy' threshold (HSR of 3.5 stars or more) ⁷	
59	90-100 %	1.3	% of distinct healthier products	% sales from healthier products
			12	8

- Dabur's average sales-weighted HSR is 1.3 (stars) out of 5 (1.4 unweighted mean HSR).
- A total of 59 products across the company's three best-selling product categories were assessed using the HSR model.
- 12% of distinct products analyzed for Dabur met the 'healthy' threshold (3.5 stars or more in the HSR).
- When taking category sales values into account, the company was estimated to derive approximately 8% of its India 2021 sales from healthier products (mostly from Sauces, Dips and Condiments).

Mean Health Star Rating by category for Dabur India Limited



- Among categories assessed, Dabur's products in Sauces, Dips and Condiments (15 products) had the highest mean HSR (2.2 out of 5.0), of which 27% reached the healthy threshold.
- The company's lowest scoring category is Sweet Spreads with a mean HSR of 1.0 out of 5, for which 0% of products reached the healthy threshold.
- In total, 4% of distinct products and 3% when sales-weighted, was found to be eligible to be marketed to children using the WHO SEAR criteria.

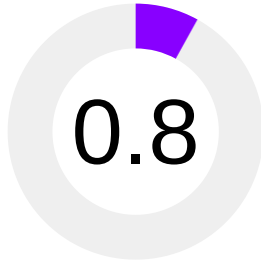
CATEGORIES

The Index is divided into seven categories which assess food & beverage companies' policies, practices and transparency related to nutrition in the Indian market.



GOVERNANCE

10% OF OVERALL SCORE



Rank 11 / Score 0.8

Highest score 9.4

Average score 1.7

- Dabur continues to highlight the achievement of its targets and plans as part of its 2018 Eat Right India pledge; however, at the time of research, it was yet to publish a new strategy or plan for how it will seek to further contribute to healthier diets and address malnutrition through its commercial operations in the coming years.
- The company reports quantitatively the percentage of its "products with increased nutritional value"; however, it does not explain what criteria these products must meet. The company also reports on the progress it has made since 2018 against its sugar reduction targets, and provided additional evidence of its phased sugar reduction approach and portion control efforts, although this is not reported publicly.

Aspects to improve

- The company is encouraged to develop a cohesive, multifaceted, and forward-looking nutrition strategy that is embedded in its commercial operations that goes beyond sugar reduction. This should, at minimum, outline the company's plans to improve the nutritional profile of its portfolio by, for example, decreasing levels of nutrients of concern (sodium and saturated fats, as well as sugar), increasing levels of positive ingredients (such as whole grains or fruits and vegetables), or fortification of key products.
- In addition to improving the healthiness of its portfolio, the company is encouraged to also consider how its 'healthier' products reach consumers relative to its less healthy products in its commercial operations, for example through via relative pricing strategies and/or increasing investments in marketing of the former).
- To drive progress internally on implementing the strategy, the company is recommended to develop specific, measurable, and timebound targets encompassing various elements of this approach. For example, the company is encouraged to set a timebound target to increase the percentage of "products with increased nutritional value", provided that this term is defined clearly according to clear nutrition criteria.
- The company is recommended to continue to report systematically on its sugar reduction efforts, as well as any other elements of its nutrition strategy once developed.
- The company is also recommended to explicitly acknowledge nutrition-related risks to its business in India in its Risk Reporting.
- The company is encouraged to clarify on the public domain its accountability arrangements regarding the implementation of its nutrition strategy and/or reformulation targets, ensuring that these are assigned to the highest levels of seniority within the company and are subject to regular review at Board-level.
- To further improve its nutrition strategy and ensure that it is maximizing its positive impact on public health, the company is strongly recommended to engage with independent experts/stakeholders, such as independent (i.e. not directly affiliated with industry) public health-oriented civil society organizations, academic institutions, (inter-)national organizations focused on public health.



PRODUCTS

45% OF OVERALL SCORE



Rank 18 / Score 1.5

Highest score 5.1

Average score 2.7

Category B2: Portfolio Development

- As part of Dabur's commitment to the Food Safety and Standards Authority of India's (FSSAI) Eat Right India movement, the company pledged to reduce added sugar by 10% in more than 50% of their portfolio between 2018 and 2023. The company disclosed in its Annual Report 2021-22 that it has voluntarily achieved a total of 14.43% added sugar reduction from the 2018 baseline, fulfilling their commitment before the 2023 deadline.
- Following the success in reaching its milestone, the company has set a new sugar reduction target, although this is not on the public domain, nor does it appear to be timebound.
- The company is currently fortifying Honey formulated with Vitamin D. Dabur also produces products such as UHT flavored milks and juices, which are covered under the standards and regulations set out by FSSAI for voluntary fortification, but does not fortify any.

Category B3: Nutrient Profiling

- While the company reports on the percentage of 'products with increased nutritional value' in its reporting, the company did not provide evidence that this is defined according to clear nutrition criteria. The company did not provide evidence that it uses a nutrient profile model (NPM) or other objective nutrition criteria to evaluate the nutritional quality of its products to inform new product development or product reformulation.

Aspects to improve

Category B2: Portfolio Development

- The company is recommended to disclose its latest sugar reduction target on the public domain, including the target year, and report against it.
- Dabur is further encouraged to adopt specific, measurable, and timebound targets to reduce sodium and saturated fat and increase positive ingredients (including whole grains and FVNL) across its relevant portfolio. These targets should ideally be aligned with the ICMR/NIN Dietary Guidelines and RDAs for Indians, and/or WHO guidelines, and are recommended to be published on the public domain.
- The company is strongly encouraged to produce more fortified products – or use fortified staple foods as ingredients – to help address specific micronutrient deficiencies in India (according to government priorities), while ensuring that there are strict internal policies and procedures in place to prevent the fortification or enrichment of unhealthy products (i.e. with high levels of fat, sugar, and/or sodium).

Category B3: Nutrient Profiling

- The company is strongly encouraged to adopt a nutrient profiling model (NPM) to determine the relative healthiness of all products in its portfolio and formally define 'products with increased nutritional value'.
- Ideally, this should be (or align closely with) an internationally recognized (or, when applicable, government-endorsed) NPM; if developing its own, the company is encouraged to apply stringent thresholds for nutrients of concern that align with (inter)national standards, and use per 100g as the reference unit (to ensure greater objectivity and comparability).
- The company is recommended to disclose all details of the NPM it uses in full, including the algorithm used to define 'healthy' (or 'products with increased nutritional value'), on the company's India website and, ideally, in a scientific journal that is peer-reviewed and indexed.



ACCESSIBILITY

15% OF OVERALL SCORE



Rank 5 / Score 0

Highest score 6.6

Average score 0.7

- No evidence of a specific strategy or approach to address the affordability of its 'healthier' products was found on the company's public domain or shared by the company.

Aspects to improve

- To ensure that products that are considered by the company to be 'healthier' (such as its 'products with increased nutritional value') are being priced affordably for lower-income consumers, the company is recommended to:
 - ensure that such products are defined as 'healthy' through the use of a nutrient profiling model (NPM) (or other clear nutrition criteria) - such that unhealthy products (HFSS) are specifically excluded;
 - have a clear approach to determining whether a product is 'affordably priced'; and
 - use a formal classification of 'lower-income consumers' that it is trying to reach.
- With these definitions and processes in place, the company is encouraged to develop and implement a strategy or approach for ensuring that at least part of its 'healthier' (and, ideally, fortified or micronutrient-rich) product portfolio is priced affordably for lower-income consumers, and continually explore new opportunities for delivering 'affordable nutrition'. Examples of approaches can be found in the methodology and chapter for Category C.
- The company is recommended to publicly disclose information about its affordable nutrition strategies/approaches, including specific definitions, the approaches taken to ensure affordability, and the progress made on implementation.



MARKETING

15% OF OVERALL SCORE



Rank 8 / Score 1.4

Highest score 8

Average score 2.3

- Through its membership to the Advertising Standards Council of India, Dabur commits to the Code for Self-Regulations of Advertising Content in India, including the Self-Regulation Guidelines on Advertising of Foods and Beverages. The Guidelines outline commitments related to the representation of products in advertisements directed at a general audience in India, and do not include specific commitments on the marketing of foods and beverages to children.

Aspects to improve

- The company is encouraged to increase transparency and accountability for its responsible marketing commitments through its membership of the ASCI by integrating these into a responsible marketing policy that covers all media channels and audiences, published on the company's website.
- The company is encouraged to strengthen its commitments on responsible marketing to children, including by adopting:
 - aligning its nutrition criteria for products considered appropriate to be marketed to children with the WHO SEAR nutrient profiling model ;
 - WHO-recommended age threshold for marketing to children of 18 years of age, in line with CCPA guidelines;
 - audience threshold of 25% for limiting children's exposure to advertisements on all media;
 - specific commitments not to use certain materials and techniques to market their products to children, including celebrities, licensed characters, promotional toys and games, and depicting children on packaging.
- The company is encouraged to commission regular third-party audits of compliance to its responsible marketing policy in India, and to disclose the results of this audit, as well as the response mechanism it has in place to address instances of non-compliance.



WORKFORCE 5% OF OVERALL SCORE



Rank 10 / Score 0.7

Highest score 7.4

Average score 1.5

- Dabur offers paternity leave of up to two weeks for male employees.
- No specific mention to workforce nutrition and supply chain workforce nutrition programs could be found on the company's website. Dabur did indicate that caloric information is displayed in the cafeteria to stimulate healthy choices.
- No policy to support breastfeeding mothers in the workplace could be identified.

Aspects to improve

- The company is recommended to develop a workforce nutrition program that includes providing access to healthy food at work, nutrition education, nutrition-related health checks, and breastfeeding support. This program should ideally be available to all employees, including those at manufacturing sites.
- The company is recommended to define quantifiable and meaningful expected outcomes for its workforce nutrition program and evaluate it accordingly - for example related to health-related behaviors, health-related outcomes, outcomes related to employee participation, or benefits to the company. Becoming a signatory of the Workforce Nutrition Alliance and utilizing its self-assessment scorecards could be a good first step in this regard.
- The company is encouraged to develop a clear policy on support extended to breastfeeding mothers at work in order to aid their maternal health; and this should apply equally to all office and production site employees. Support should, at a minimum, include i) Private, hygienic, safe rooms for expressing breastmilk; ii) Refrigerators in place to store milk; and iii) Other flexible working arrangements to support breastfeeding mothers, such as flexible working hours or on-site creche facilities. Furthermore, it is important to foster a workplace culture that is supportive of breastfeeding, for example through awareness campaigns.
- The company is also encouraged to develop a workforce nutrition program for its supply chain workers, starting with a needs assessment to identify those groups at highest risk of experiencing malnutrition. It can then engage with its supply chain partners and relevant civil society organizations to help reach these groups, further study the underlying causes of malnutrition in that specific context, and develop a tailored program to address their nutritional needs in a targeted manner. For more guidance, see the ATNI 2021 Action Research report and/or engage with the Workforce Nutrition Alliance (WNA).



LABELING

5% OF OVERALL SCORE



Rank 13 / Score 0

Highest score 7.5

Average score 2.6

- No evidence of a standardized policy or approach to front-of-pack (FOP) product labelling beyond legal requirements could be found on the company's public domain.
- Limited nutritional information is provided for the company's products on its website.

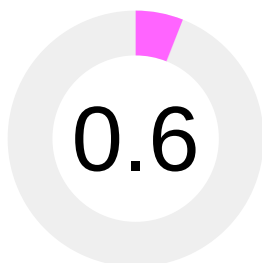
Aspects to improve

- Once it is formally enacted by FSSAI, if the INR FOP labeling system is on a voluntary basis, the company is strongly encouraged to adopt it across their entire portfolios in India.
- The company is encouraged to ensure that nutritional information is available for all products on its website both as high-definition images of the front and back of products, and as accompanying tables showing comprehensive product-specific nutritional information.



ENGAGEMENT

5% OF OVERALL SCORE



Rank 11 / Score 0.6

Highest score 8.5

Average score 2.1

- The company states on its website “we do not engage in lobbying”, but that it does engage with governments through “Multi-stakeholder meetings, Constructive relationships, regular interactions” and “Responding to public consultations on issues relevant to our business” on an ongoing basis.
- In its 2021-22 Business Responsibility and Sustainability Report (BRSR), under Principle 7, the company indicates that it is a member of twelve trade associations, and that it has partnered with them in policy development processes, without providing any specific examples.
- The company states in its 2021-22 Annual Report that it is “also a member of various task forces and forums within these trade bodies. We actively contribute to these forums on policy matters and issues that impact the interest of our stakeholders.” However, it does not disclose any specific examples.
- In addition, according to their respective websites, the company holds a leadership position on the Indian Beverage Association (IBA) and is also a member of the Protein Foods and Nutrition Development Association of India (PFNDAI), which is not disclosed by the company.

Aspects to improve

- The company is strongly encouraged to clearly define, on the public domain, how it defines “lobbying”, and what actions are and are not included in this definition.
- To govern its conduct in policy-related multistakeholder meetings, responding to public consultations, and other interactions with policymakers, the company is encouraged adopt a responsible engagement policy, which also applies to third-parties advocating on behalf of the company, in which it commits that personnel will conduct themselves responsibly; to be transparent about their identity and intentions; to require that the evidence presented shall be as independent and representative as possible; and to always consider the wider public health interest in its efforts.
- The company is recommended to publish details about the governance of its policy engagement and advocacy in India, including roles and responsibilities within the organization, approval procedures, and tracking mechanisms. If these are not already in place, they should be developed.
- The company is encouraged to keep track of all engagements with policymakers with regards to nutrition-related policy and publish these on the public domain. The company can also be more transparent about its role policy-related multistakeholder meetings, responding to public consultations, and other interactions with policymakers, disclosing specific examples and what was discussed, especially relating to public health policy.
- Dabur is encouraged to report more comprehensively on the ‘Leadership Indicator’ for BRSR Principle 7. It should disclose its policy positions on key nutrition-related policy measures that are under debate or development in India that would likely affect the company (for example, whether or not it supports FSSAI’s new Front -of-Pack (FOP) labelling system, and under what conditions), even if the company is not engaging directly. These disclosures should be as specific and unambiguous as possible, be approved by the Board, and should consider the wider public health interest and long-term material implications of rising levels of malnutrition in India.
- To further enhance transparency and signify to stakeholders which trade associations the company has greater stakes in, it is recommended to clearly indicate which it holds leadership positions on (for example, on their Boards, management committees), as well as the “task forces and forums” the company alludes to in its reporting. In addition, it is recommended to conduct a comprehensive review of its trade association memberships in India to ensure that each one is disclosed.

SUSTAINABILITY

- The company provides evidence of reducing plastic use and transitioning to more sustainable forms of packaging, stating that it has become “plastic waste positive”, collecting, processing, and recycling more plastic than it sells each year, which was 27,000 MT of post-consumer plastic waste from all over India in the fiscal year 2021-22.

Aspects to Improve

- The company is strongly encouraged to track its GHG emissions in India, beginning with those in Scopes 1 and 2.
- The company is also recommended to set clear targets to reduce GHG emissions across each of these Scopes that are aligned with the Paris Agreement’s 1.5°C trajectory, and report quantitatively on progress. These targets (and reporting) should be for absolute reductions against a baseline, rather than relative emissions (i.e. ‘emissions intensity’).
- The company is encouraged to work with its value chain partners to reduce both FLW and plastic use. This should go beyond requirements set out in mandatory waste management regulations.
- The company is encouraged to ensure that its efforts to transition to sustainable forms of packaging in India are evidence-based, and correspond with clear quantitative sustainability outcomes.

Footnotes

1. Confectionery|Sauces, Dips and Condiments|Juice|Sweet Spreads
2. ATNI estimates this value by taking the proportion of healthy products within each category assessed and multiplying that figure by the global category retail sales. The values are then aggregated to generate an estimate of the overall global healthy sales (excluding baby foods, plain tea, and coffee, which are not included in the Product Profile).
3. The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. The underlying nutrient profile model assesses nutrients of concern (sodium, total sugar, saturated fat, and overall energy) and positive food components/ nutrients (fruit and vegetable content, protein, fiber, and, in some cases, calcium) to score products on the basis of nutritional composition per 100g or 100mL. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthier. Product Profile results account for 30% of the total Index score.
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5. The Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. This score represents the mean Health Star Rating of the product portfolio.
6. Retail sales data derived from Euromonitor International.
7. The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy.

