

Coca-Cola India^{i 1}

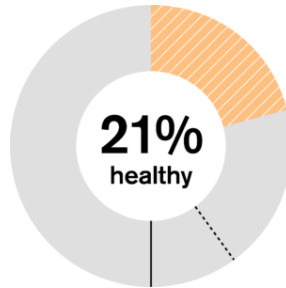
Product categories assessed
Bottled Water|Carbonates|Juice

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

Headquarters
U.S.

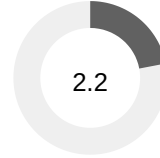
Type of ownership
Private corporation

Euromonitor International Limited [2021]
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Target value 50%
Intermediate target 40%

^{i 2}

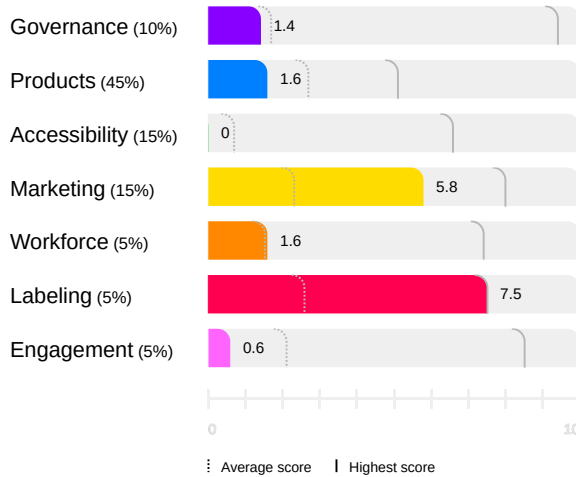


Corporate profile score

Important

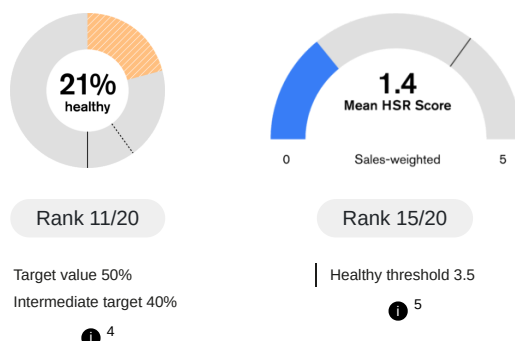
The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information. Therefore, in the case of 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



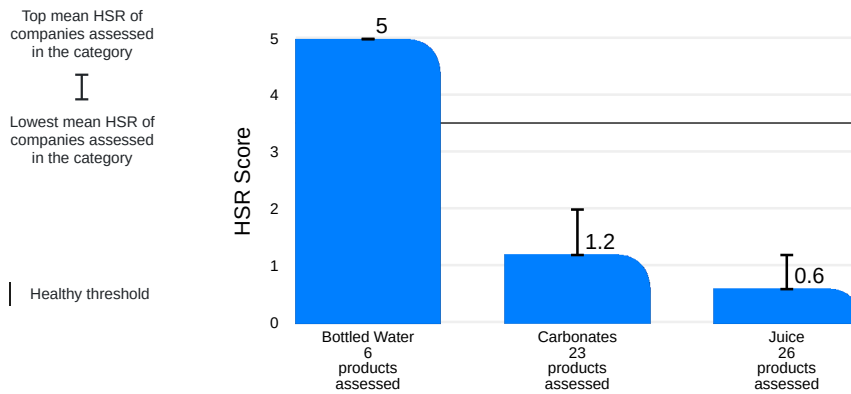
The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. The underlying nutrient profile model assesses nutrients 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	
55	90-100 %	1.4	% of distinct healthier products	% sales from healthier products
			18	21

- Coca-Cola India's average sales-weighted HSR is 1.4 (stars) out of 5 (1.3 unweighted mean HSR).
- A total of 55 products across the company's three best-selling product categories were assessed using the HSR model.
- 18% of distinct products analyzed for Coca-Cola India 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 21% of its India 2021 sales from healthier products (mostly from Bottled Water).

Mean Health Star Rating by category for Coca-Cola India



- Among categories assessed, Coca-Cola India's products in Bottled Water (6 products) had the highest mean HSR (5.0 out of 5.0), of which 100% reached the healthy threshold.
- The company's lowest scoring category is Juice with a mean HSR of 0.6 out of 5, for which none of the products reached the healthy threshold.
- In total, 13% of distinct products and 12% 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 9 / Score 1.4

Highest score 9.4

Average score 1.7

- On its website, Coca-Cola India lists four “key actions” regarding nutrition and health: offering drinks with nutritional benefits (including fortification); innovation and reformulation (to reduce sugar content); front-of-pack (FOP) labelling; and portion control. The company reports a range of output-level examples of actions taken over the last year per ‘action’ in its Sustainability Report.
- The company provided evidence that its regional leadership team reviews its India-specific nutrition strategy on a regular basis.

Aspects to improve

- In addition to improving the healthiness of its portfolio, Coca-Cola India 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, and to ensure the company can be held to account for delivering on it, the company is recommended to develop specific, measurable, and timebound targets encompassing various elements of its strategy.
- To demonstrate to external stakeholders that it is delivering on its nutrition strategy and/or commitments in India, the company is recommended to report more comprehensively on all elements of its approach in India and against all targets that have been set, showing what has been achieved year-on-year across its portfolio or key product categories. Reporting should ideally take the form of quantitative metrics, and progress documented systematically.
- The company is recommended to assign formal responsibility for the success of its nutrition strategy to the highest levels of seniority within the company in India, who shall take ownership of any targets and/or KPIs by which success or failure can be measured. Ideally, to make this more concrete and further incentivize progress, this should be linked to remuneration arrangements or other incentives for the responsible person and/or other key senior personnel.
- The company is also recommended to acknowledge nutrition-related risks to its business in India more explicitly on its India website (as well as global).
- 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. These engagements, including the impact they had on the company’s strategy, should ideally be disclosed on the public domain.



PRODUCTS

45% OF OVERALL SCORE



Rank 16 / Score 1.6

Highest score 5.1

Average score 2.7

Category B2: Portfolio Development

- Coca-Cola India reports on its efforts to reduce sugar content in a range of its popular products and offering sugar-free alternatives; however, it does not report on overall sugar reductions across its portfolio, nor could any specific and timebound targets be identified.
- In 2021, as a member of the International Food and Beverage Alliance (IFBA), Coca-Cola with other members collectively developed and committed to standardized, stepwise voluntary global sodium reduction targets for key categories of products to be achieved incrementally by 2025 and 2030.
- Coca-Cola India fortifies a variety of its fruit juices, milk and water beverages with one or more vitamins such as Vitamin C, Vitamin D, and Vitamin B12 or minerals like Zinc and Iron.

Category B3: Nutrient Profiling

- 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

- In order to drive progress on improving the healthiness of its portfolio, the company is encouraged to adopt specific, measurable, and timebound targets to reduce levels of sugar and increase positive ingredients (such as fruits and vegetables) across its 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 recommended to report progress against all reformulation targets on an annual basis, in a consistent and easily accessible manner, in order to increase transparency and accountability.

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.
- 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 nutrient thresholds it uses, reference values, and how 'healthy' is defined, 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' 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 3 / Score 5.8

Highest score 8

Average score 2.3

- Through its membership to the Advertising Standards Council of India, Coca-Cola India 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.
- Coca-Cola India adheres to the company's global Responsible Marketing Policy which covers all audiences, including children under the age of 13. The policy states that it covers all media, including shows, print media, websites, social media, movies, and SMS/email marketing. The company uses an audience threshold of 30% to limit its marketing to children across all media.
- The company commits 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's Responsible Marketing Policy is subject to third-party audits in India via its membership with the International Food and Beverage Association. In addition, the company conducts internal audits of its responsible marketing activities on a randomized basis.

Aspects to improve

- 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;
 - a specific commitment not to use third-party or own fantasy and animation characters, including brand equity characters, in its advertisements.
- 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 in India.



WORKFORCE 5% OF OVERALL SCORE



Rank 6 / Score 1.6

Highest score 7.4

Average score 1.5

- Coca-Cola India makes healthy food available to its employees at work by offering a range of healthy food options, including fresh fruits, vegetables, whole grains, and lean proteins. Further, at the cafeteria, calorie information is displayed for all items to encourage healthy choices. It is not clear if this is part of a formal program with targets in place.
- Nutrition education is offered to Coca-Cola India's employees through a subscription to various apps, which offers various resources related to nutrition. It is not clear if there are targets connected to the program.
- Coca-Cola India employees can avail an annual complimentary comprehensive health check-up (discounted at 50% for the spouse) as part of the Coca-Cola annual Health Check up program. It is not clear which nutrition-focused health checks are carried out.
- "Coca-Cola India offers 30 days of paid paternity leave, or second caregiver leave, including parenthood for male Associates through surrogacy & adoption, spouse miscarriage or stillbirth. Male associates are offered the same 26 weeks (for the first two children) as female associates for maternity leave if the male associate is the primary caregiver.
- Coca-Cola India offers flexible working arrangements to support breastfeeding mothers. The company also has a creche support policy, reimbursing part of the childcare expenses for children from 6 months to 6 years.
- No specific mention of supporting the nutrition of its supply chain workforce in India could be found.

Aspects to improve

- Coca-Cola India is recommended to build on its current efforts by developing an integrated 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 made 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 extend the current policy on support extended to breastfeeding mothers at work to by also including i) private, hygienic, safe rooms for expressing breastmilk; ii) refrigerators in place to store milk. It should be clear that this applies equally to all office and production site employees.
- Coca-Cola India is encouraged to remove limitations to its maternity and paternity or second caregiver leave policy based on the number of children born.
- The company is also encouraged to develop a workforce nutrition program for its supply chain workers in India, 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 WNA.



LABELING 5% OF OVERALL SCORE



Rank 1 / Score 7.5

Highest score 7.5

Average score 2.6

- The company displays numeric information for key nutrients on the front-of-pack (FOP) for the majority of its relevant portfolio.
- The company provides nutritional information tables on its website for all relevant products, including per 100ml and % RDA per serve information. The website also shows images of FOP, however these frequently appear to be missing the calorie information that would be displayed on physical product packs.
- The company makes some effort to help external parties find healthier varieties on its website through options to sort their brands by 'Nutrition and Hydration' products. However, it is not clear how products are defined as "healthier", and whether they need to meet formal nutrition criteria.

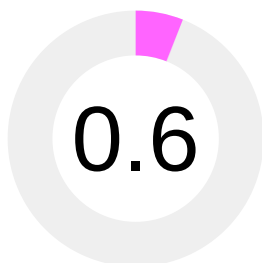
Aspects to improve

- 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.



ENGAGEMENT

5% OF OVERALL SCORE



Rank 11 / Score 0.6

Highest score 8.5

Average score 2.1

- No responsible advocacy policy was found for Coca-Cola India, beyond commitments to comply with the law and anti-bribery and corruption policies (legally required in India).
- All information found relating directly to responsible advocacy and corresponding management processes appeared to apply specifically to the company's North America business.
- On its website, the company states that "environmental policy, health and wellness and taxes" are its "top [political] advocacy areas". However, it provides no specific details beyond these broad categories.
- The company indicated to ATNI that it has participated in the FSSAI public consultation sessions since 2019 on developing an FOP labelling system; however, this is not disclosed on the company's public domain.
- The company voluntarily lists all six "trade associations and policy groups" it belongs to in India on its India and South West Asia (ISWA) website.
- Its Vice President of Public Affairs for the ISWA region is a member of the Indian Beverage Association (IBA)'s Managing Committee, although this is not disclosed on the company's public domain. The company is also listed as a member on the websites of the Protein Foods and Nutrition Development Association of India (PFDI), PHD Chamber of Commerce and Industry (PHDCII), and All India Food Processors' Association (AIFPA).

Aspects to improve

- The company is encouraged adopt a formal responsible advocacy policy that is clearly applied in India, 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. It should also clearly define what it defines as advocacy and/or lobbying activities.
- The company is recommended to publish details about the governance of its policy engagement and advocacy efforts in India, including roles and responsibilities within the organization.
- The company should comprehensively disclose details of all engagements with policymakers with regards to influencing nutrition-related policy in India, including participation in policy-related multistakeholder meetings, responding to public consultations, and any other interactions with policymakers, such as those relating to FSSAI's FOP labelling system development.
- This should also include a clear statement of the company's positions on the policy measures in question and should be as specific and unambiguous as possible. Disclosure of policy positions should also happen for policy measures advocated indirectly by the company, for example via its trade associations. These policy positions 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 seats on (for example, on their Boards, management committees, or thematic working groups or sub-committees). This should be the case with regards to the IBA, for example, and any others where applicable.
- 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 has a target in place to reduce absolute emissions by 25% by 2030 against a 2015 baseline, and achieve net zero emissions by 2050. However, it does not publicly disclose its progress.
- Coca-Cola India provides evidence of activities to collaborate with value chain partners to prevent food loss and waste from being generated, stating that through their 'Fruit circular economy' initiative they collaborate with farmers and partners "to increase the yield and better crop productivity through sustainable agriculture practices".
- Coca-Cola India states that it is a member of India Plastics Pact, with targets that include "100% of plastic packaging to be reusable or recyclable", "50% of plastic packaging to be effectively recycled", and "25% average recycled content across all plastic packaging" – however it is unclear if these are timebound. The company does however state a target to collect and recycle a bottle or can for each one they sell by 2030. The company gives the example of its Kinley bottles now being made with 100% Recycled PET (R-pet).

Aspects to Improve

- The company is encouraged to track its GHG emissions across its wider value chain (Scope 3) and set targets to reduce these.

Footnotes

1. Bottled Water|Carbonates|Juice
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.

