#### BMS Index 2024

## Vinamilk

#### Headquarters

Viet Nam

#### Type of ownership

Public

Estimated percentage of Vinamilk's global F&B sales from BMS  $\bullet$  1 7%

Estimated percentage of Vinamilk's global baby food sales from BMS • 2 67%

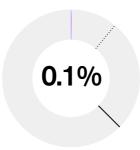
Countries covered in country studies Viet Nam

#### Company also assessed in:



CF Index 2024

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BMS Marketing Score 2024 10 3

> Average score Highest score



**0%** 1 country



Corporate Profile Score

1/18

0.1%

#### Important:

The research findings regarding companies' performance in this Index are based on information shared by companies or gathered by service providers, in addition to information that is available in the public domain.

The level of detail and comprehensiveness of information shared by companies and gathered through external service providers varied. In the case of limited or no engagement by companies, this Index may not represent the full extent of their efforts. Similarly, in the case of limited data collected by service providers, the findings of this Index may not provide a comprehensive representation of company practices.

ATNI's research and Indexes do not assess compliance with local regulations or laws, but rather assess private sector performance against international standards and guidance.



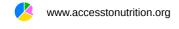
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## **BMS Country Studies**



The Country Studies component of the BMS and CF Marketing Indexes 2024 evaluates the extent to which a company's marketing practices align with specific provisions of the WHO Code (not against local Code-related regulations). The main marketing channels assessed in the Country Studies for the BMS and CF Marketing Indexes 2024 are online points-of-sale, traditional and online media outlets, and product labels which were all assessed according to the NetCode protocol. Vinamilk only sells BMS products in Viet Nam, one of the five countries selected for the assessment, which represents 100% of Vinamilk's estimated global BMS sales. The Country Studies results for Vinamilk are summarized below for Viet Nam across each marketing channel.

https://new-I40rlzsq.accesstonutrition.org/app/uploads/2024/03/Assessmentmethods-and-scoring.pdf



## **Country Studies overview**

Vinamilk	Country assessments			BMS market 1 5	
	Total incidences of non-compliance across online, traditional media, and product labels • 6	Number of product labels assessed 1 <sup>7</sup>	Company brands found	BMS market share	Proportion of Vinamilk's global BMS sales
CHINA	N/A	N/A	N/A	N/A	N/A
GERMANY	N/A	N/A	N/A	N/A	N/A
INDONESIA	N/A	N/A	N/A	N/A	N/A
US	N/A	N/A	N/A	N/A	N/A
VIET NAM	44	18	Dielac Optimum Gold	18%	100%

#### Code compliance level

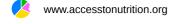
Complete
(0 incidences of Code noncompliance corresponding to a
country score of 100%)

High
(>0-10 incidences of Code
non-compliance corresponding
to a country score of 66%)

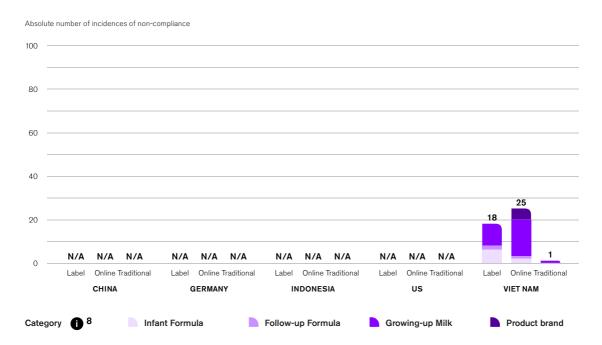
Medium (>10-20 incidences of Code non-compliance corresponding to a country score of 33%) Low (> 20 incidences of Code noncompliance corresponding to a country score of 0%)

• In Viet Nam, Vinamilk's holds approximately 18% of the country's BMS market share, while it represents 100% of the company's global BMS sales. A total of 44 incidences of non-compliant marketing practices for Vinamilk BMS products were found, which included 25 non-compliant

advertisements or promotions on online media channels, one non-compliant TV advertisement and all of the 18 product labels assessed contained at least one incidence of non-compliance.



# Observed incidences of non-compliance with the Code per country



## Main in-country findings

The total number of incidences of non-compliant marketing practices for Vinamilk that were found in Viet Nam was 44. The majority of incidences of non-compliant marketing practices for Vinamilk were identified through the social listening of online platforms (25 out of 44). The incidences of non-compliance found online and traditional media were largely concerning growing-up milks and non-compliant labels found across all types of BMS.

#### Online findings

- Among the total of 25 incidences of non-compliances found online, 10 were point-of-sale promotions. Despite ATNI's request for Vinamilk to verify any contractual relationship with the retailers monitored, confirmation could not be obtained from the company. Promotions found on online retailer platforms had an average of two incidences of non-compliance per promotion found. Along with the advertisements identified, which are non-compliances with Article 5.1 of the Code, discounts were also identified. One of the promotions was for infant formula, one for follow-up formula and the other eight for growing-up milks.
- The remaining 15 online media observations were found on the company's in-country websites and social media platforms (Facebook and YouTube) as well as parenting sites. An average of three incidences of non-compliance were identified per observation. Apart from advertising BMS a non-compliance with the Code in itself other common instances found with those advertisements included various incentives for product purchase, such as gifts, as well as company provision of information and educational materials on infant and young child feeding which are actions that do not comply with the Code. Furthermore, all the adverts contained at least one type of claim (nutritional, health and/ or marketing claim).

#### Traditional media findings

One advertisement was identified on television in Viet Nam for a Vinamilk BMS product, concerning a growing-up milk. The advertisement included a discount and contained a health claim.

#### **BMS** product label

- All the 18 Vinamilk BMS product labels assessed contained at least one incident of Code non-compliance, with an average of 5 incidences of non-compliance per product label.
- All the labels assessed included nutritional, health and/ or marketing claims. All of the labels with clear images were missing a statement on the importance of exclusive breastfeeding in the first six months and continued breastfeeding for up to two years or beyond. Of all products, 12 out of 18 included a text that makes a comparison to breastmilk for example "prebiotics with a similar structure to nutrients found in breast milk ". Other common observations classified as non-compliant with the Code included absence of a clearly legible statement that the product should be used only on the advice of a health worker, and of warning against the health hazards of inappropriate preparation and usage.
- It is worth noting that ATNI did not have the resources to

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collect products from the different markets and take pictures of their labels. In this iteration, ATNI's research was based on product label images from an external provider. For some products, images were not clear enough or did not show all parts of the package, thus ATNI asked the respective companies to provide images of the labels. As Vinamilk did not respond to ATNI during the verification

phase, the company had not provided images of product labels as requested by ATNI. Therefore, incomplete assessments remained for a total of 10 products. If at least one incidence of non-compliance was identified from the existing images, these labels were counted as a non-compliant observation.

### Recommendations

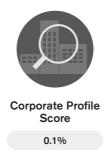
- Given the high number of incidences of non-compliant marketing practices observed in Viet Nam, Vinamilk is strongly encouraged to strengthen its responsible BMS marketing policies and ensure their full alignment with the recommendations of the Code and all subsequent relevant resolutions, including the guidance supported by WHA resolution 69.9. ATNI has developed a model company policy on the responsible marketing of BMS which can guide the company on how to incorporate Code provisions and align with the latest public health requirements in practice.
- Vinamilk is urged to restrict the advertising and promotion of all types of BMS products and brands on all forms of media platforms. The company should also refrain from offering educational materials on infant and young child feeding and incentivizing the purchase of those products by offering gifts.
- Vinamilk is strongly encouraged to take responsibility for monitoring its marketing practices beyond local regulations, according to the principles and the aim of the Code and subsequent relevant resolutions, and to take steps to ensure this includes online media channels.
- Vinamilk is encouraged to engage with its industry associations, retailers and/or regulators to ensure that there are no promotions of BMS products in the retail environment, and see that products are appropriately marketed in line with the Code.
- Given that each of the labels assessed were found to be non-compliant with the Code requirements in at least one

- aspect, Vinamilk is encouraged to focus on improving labeling practices across all markets to ensure full compliance with the Code and all subsequent relevant resolutions, including the guidance supported by WHA resolution 69.9. This includes ensuring that the product contains a statement promoting the importance of exclusive breastfeeding for the first six months and continued breastfeeding up to two years or beyond, a statement that the product should be used only on the advice of a health worker, and that labels do not include health or nutrition claims, except if specifically provided for in national legislation.
- Clear evidence was found of Vinamilk applying point-of-sale promotions for growing-up milks and promoting these on online platforms, which is contrary to the requirements of the Code, specifically the guidance supported by WHA resolution 69.9 that extended the scope of the Code to growing-up milks. Therefore, ATNI urges Vinamilk to ensure its commitments are extended to include growing-up milks in all markets.
- Vinamilk is strongly encouraged to cooperate fully with any future independent third-party assessments by providing clear and comprehensive product label images. Incomplete assessments can lead to inaccurate evaluations and hinder efforts to address incidences of non-compliance effectively.
- ATNI is calling on Vinamilk to review all incidences of non-compliance identified across all marketing channels, which were shared in detail with the company, and to take corrective action.

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## **BMS Corporate Profile**



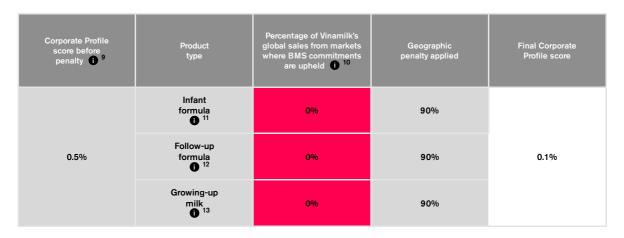
The Corporate Profile component of the BMS and CF Marketing Indexes 2024 evaluates the extent to which a company's policies align with various provisions of the Code, the effectiveness of its related management systems as well as the company's level of disclosure on commitments relating to BMS marketing. Vinamilk's BMS marketing commitments were assessed across 11 topics that cover different aspects of the Code on which the company scored an average of 0.52%. This score is equivalent to the company's initial overall Corporate Profile score before a geographic penalty (if applicable) is applied to each BMS product type. The final Corporate Profile score considers how the company's BMS marketing commitments are applied for the different BMS product types sold by the company, and across different markets. As Vinamilk sells infant formula, follow-up formula, and growing-up milks, the company's application of BMS commitments was evaluated for each product type, as shown in the next section on 'Geographic application of BMS commitments by product type'. The scores and findings on each topic are described in further detail in the section below on 'BMS Commitments by Topic'.

https://newl40rlzsq.accesstonutrition.org/app/uploads/2024/03/Geographicpenalty.pdf



# Geographic application by Vinamilk of BMS commitments by product type

The table below shows the percentage of product sales where commitments are upheld and the geographic penalty applied to each type of BMS. The penalty ranges from 0% up to 90% depending on whether a company fully upholds its BMS marketing commitments in all or none of the countries in which it operates, respectively, where national Code regulations are absent or less stringent than the company's policies and standards.



#### Commitments are upheld

- Upheld for all products in this category without exception globally
- Upheld for some products in this category without exception globally
- Upheld for all products in this category without exception only in some markets
- Upheld for some products in this category, and only in some markets
- Not upheld for this product category in any market
  - No policy found in the public domain nor shared by the company, therefore no information on how commitments are upheld

No information was found in the public domain nor shared by the company describing how BMS marketing commitments are upheld for each product type and in which markets. Therefore, the corresponding geographic penalty for each product type (infant formula, follow-up formula, and growing-up milk) is the maximum of 90% and the final Corporate Profile score is 0.05%.

#### Infant formula

The corresponding geographic penalty for this product type is the maximum of 90%.

#### Follow-up formula

The corresponding geographic penalty for this product type is the maximum of 90%.

#### Growing-up milk

The corresponding geographic penalty for this product type is the maximum of 90%.

ATNI calls on Vinamilk to develop and/or publish a BMS marketing policy that fully aligns with the wording of the Code, in addition to upholding the relevant national regulations in Viet Nam. The policy should also cover all milks that are specifically marketed for feeding infants and young children from birth up to the age of three years, and it should be applied in all markets in which the company operates in.

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## **Topics Overview**

1. Overarching Commitments 2. Advertising and Promotions 3. Healthcare Systems 4. Donations 5. Healthcare Workers 0% 6. Employee Incentives 7. Labeling 0% 8. Product Quality 9. Implementation and Monitoring 5.7% 10. Lobbying and Influence 11. Disclosure 0% Highest score

These represent the initial overall scores before applying the penalty.

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## BMS commitments by topic

Most topics include assessments on both policy commitments and management systems, except for the topic on 'Implementation and Monitoring', which mostly considers management systems, and the topic 'Overarching Commitments', which considers policy commitments only. A separate topic assesses the level of disclosure and transparency practiced by companies on the different aspects of the Code.

## 1. Overarching Commitments

This topic consists of policy commitment indicators only.



Average score
Highest score (FrieslandCampina, H&H)

#### **Policy Commitment**

- ATNI did not find a BMS marketing policy published by Vinamilk. No
  other relevant information was found to reflect recognition of the
  International Code of Marketing of Breast-milk Substitutes and
  relevant subsequent WHA resolutions, including the guidance on
  ending the inappropriate promotion of foods for infants and young
  children supported by WHA resolution 69.9.
- No information was found either on the company's support of exclusive breastfeeding for the first six months and continued breastfeeding up to two years of age or beyond, as well as of the introduction of appropriate complementary foods from the age of six months, as per international public health recommendations.
- The company therefore did not score on this topic. To score in this
  area in future, Vinamilk is urged to recognize the Code in full and to
  make these statements.

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## 2. Advertising and Promotions

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

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Average score Highest score (FrieslandCampina)



Average score Highest score (FrieslandCampina)

#### **Policy Commitment**

- In its 2021 annual report and website, Vinamilk states having directly provided samples of its BMS products to caregivers of infants and young children, along with coupons, gifts of articles and utensils that may promote the use of BMS products. Therefore, Vinamilk did not score on this topic. No BMS Marketing policy was found in the public domain and ATNI was not able to establish contact with the company during the research phase.
- In order to score in this area, the company should comply with Article 5 of the Code and recommendation 6 of the guidance supported by WHA 69.9, by refraining from advertising BMS through various media channels and prohibiting distribution of samples or promotional materials to caregivers. Additionally, the company should avoid point-of-sale promotions and cross-promotion between different types of BMS, ensuring distinct packaging and labeling for each BMS product type.
- Vinamilk is encouraged to adopt these Code requirements in full and clearly outline them in a company policy dedicated to the responsible marketing of breast-milk substitutes.

#### **Management System**

- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

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## 3. Healthcare Systems

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

www.accesstonutrition.org Vinamilk Scorecard BMS Index 2024





Average score Highest score (H&H)



Highest score (FrieslandCampina, Nestlé)

#### **Policy Commitment**

- No BMS Marketing policy was found in the public domain and ATNI was not able to establish contact with the company during the research phase. Further, in Vinamilk's sustainability report the company stated having given gifts of its BMS products to caregivers of infants and young children through the health system, Therefore, Vinamilk did not score on this topic.
- In order to score in this area, the company should comply with Article 6 of the Code and recommendation 6 of the guidance supported by WHA 69.9, by refraining from using healthcare facilities for promoting BMS products, displaying related materials, providing gifts or coupons to caregivers and offering them education on infant and young child feeding or deploying personnel within these settings. The company should also prohibit demonstrations of formula feeding by its staff and avoid hosting events or campaigns in health facilities.
- Vinamilk is encouraged to adopt these Code requirements in full and clearly outline them in a company policy dedicated to the responsible marketing of breast-milk substitutes.

#### **Management System**

- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

#### 4. Donations

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

www.accesstonutrition.org Vinamilk Scorecard BMS Index 2024 11/18



Average score Highest score (H&H)



Average score

Highest score (Danone, FrieslandCampina, Nestlé)

#### **Policy Commitment**

- No BMS Marketing policy was found in the public domain and ATNI was not able to establish contact with the company during the research phase. Further, in the company's sustainability and annual reports (2021-2022), ATNI identified statements of Vinamilk declaring donations of its products within the scope of the Code as part of the health care system and in health care facilities, as well as humanitarian and emergency settings. Therefore, Vinamilk did not score on this topic.
- In order to score in this area, the company should comply with the Code requirements specified in recommendation 6 of the guidance supported by WHA resolution 69.9, as well as WHA resolutions 47.5 and 63.23, and the Operational Guidance for Infant and Young Child Feeding in Emergencies. The company should comply with the Code recommendations by refraining from providing free or reduced-price BMS products (including equipment, materials, or services) through healthcare facilities. In humanitarian settings, BMS donations should be provided only upon official authoritative request, ensuring compliance with Code provisions and quality standards. In social welfare institutions, BMS products are only provided upon request, without using donations for sales inducement or distribution outside institutions.
- Vinamilk is encouraged to adopt these Code requirements in full and clearly outline them in a company policy dedicated to the responsible marketing of breast-milk substitutes.

#### **Management System**

- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

#### 5. Healthcare Workers

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

www.accesstonutrition.org Vinamilk Scorecard BMS Index 2024 12/18





Average score
Highest score (Danone, FrieslandCampina, H&H,
Nestlé Reckitt)



#### **Policy Commitment**

- No BMS Marketing policy was found in the public domain and ATNI was not able to establish contact with the company during the research phase. Furthermore, throughout the company's sustainability and annual reports (2021-2022), ATNI identified statements of Vinamilk declaring donations of its products within the scope of the Code to health care workers and members of their families. Therefore, Vinamilk did not score on this topic.
- In order to score in this area, the company should comply with Article 7 of the Code and recommendation 6 of the guidance supported by WHA 69.9 by ensuring only factual information is provided to health workers that does not imply bottle-feeding superiority and it is limited to provide guidance on appropriate use of BMS. Any form of financial or material inducements to healthcare staff should be prohibited, and as a BMS company it should not sponsor scientific meetings for health professionals to avoid conflicts of interest.
- Vinamilk is encouraged to adopt these Code requirements in full and clearly outline them in a company policy dedicated to the responsible marketing of breast-milk substitutes.

#### **Management System**

- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

## 6. Employee Incentives

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Average score
Highest score (FrieslandCampina)

#### **Policy Commitment**

- As a BMS Marketing policy was not found in the public domain and ATNI was not able to establish contact with the company during the research phase, Vinamilk did not score on this topic since no relevant information was found in regard to the company's commitments on the incentives of company employees involved in BMS marketing.
- In order to score in this area, the company should comply with Article 8 of the Code by excluding the sales volume of BMS products from determining incentives for its employees or distribution partners.
- Vinamilk is encouraged to adopt these Code requirements in full and clearly outline them in a company policy dedicated to the responsible marketing of breast-milk substitutes.

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#### **Management System**

- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

## 7. Labeling

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Average score
Highest score (FrieslandCampina)

#### **Policy Commitment**

- As a BMS Marketing policy was not found in the public domain and ATNI was not able to establish contact with the company during the research phase, Vinamilk did not score on this topic since no relevant information was found in regard to the company's commitments on the labelling of BMS products.
- In order to score in this area, the company should comply with Article 9 of the Code and recommendation 4 of the guidance supported by WHA resolution 69.9 by ensuring that BMS packages have clear labels with information in the appropriate local language(s) and that they include appropriate breastfeeding messages. Labels should avoid idealizing formula use, include ingredient information as well as warnings against the health hazards of inappropriate powdered formula preparation. Health or nutrition claims for BMS products should only be included if required by national regulations.
- Vinamilk is encouraged to adopt these Code requirements in full and clearly outline them in a company policy dedicated to the responsible marketing of breast-milk substitutes.

#### **Management System**

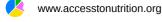
- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

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## 8. Product Quality

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Vinamilk Scorecard BMS Index 2024



Average score
Highest score (Abbott, H&H)



Average score
Highest score (Abbott, FrieslandCampina, H&H,
Reckitt)

#### **Policy Commitment**

- As a BMS Marketing policy was not found in the public domain and ATNI was not able to establish contact with the company during the research phase, Vinamilk did not score on this topic since no relevant information was found in regard to the company's commitments on the quality of BMS products.
- In order to score in this area, the company should comply with Article 10 of the Code and is encouraged to clearly outline which specific Codex standards it follows at a minimum and to ensure that the listed standards are regularly revised so that the most updated versions are adhered to.

#### **Management System**

- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

## 9. Implementation and Monitoring

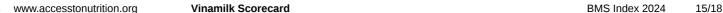
This topic consists of policy commitment indicators and management system indicators. The policy commitment indicators contribute to 20% of the topic score, while 80% of the weight of the score is attributed to management system indicators.



Average score
Highest score (Danone, FrieslandCampina, H&H,
Nestlá)

#### **Policy Commitment**

- As a BMS Marketing policy was not found in the public domain and ATNI was not able to establish contact with the company during the research phase, Vinamilk did not score on this topic since no relevant information was found in regard to the company's commitments on monitoring its BMS marketing practices.
- In order to score in this area, the company is encouraged to develop
  a policy dedicated to the responsible marketing of breast-milk
  substitutes, if it does not already have one, and clearly define as well
  as effectively communicate responsibilities for implementing BMS
  marketing commitments and monitoring compliance of the
  company's practices to the principles of its BMS marketing policy.







Average score
Highest score (FrieslandCampina)

#### **Management System**

- Like most companies assessed in the BMS Marketing Index, the company was found to follow globally recognized food safety and quality standards to certify its products, such as ISO and FSSC, which was clearly evidenced in Vinamilk's 2021 sustainability report.
- ATNI was unable to identify any further documentation about any management systems the company has in place to implement any policy it may have in relation to BMS marketing.
- To score in this area, Vinamilk would need to develop clear guidance for its employees and contractual third-parties on the responsible marketing of BMS as outlined in the company's related policy(ies). The company should also have effective systems in place to monitor and manage incidences of non-compliance with the company's BMS marketing policy(ies). The company should also clearly assign executive responsibilities and oversight to ensure the effective implementation of its BMS marketing policy.

## 10. Lobbying and Influence

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Average score Highest score (Nestlé)

#### **Policy Commitment**

- ATNI did not find any publicly available information with regard to any commitments or objectives the company has in relation to engagement with policymakers on BMS marketing. The company therefore did not score on this topic.
- To score in this area, Vinamilk is encouraged to develop a policy setting out under what circumstances and how it will lobby and engage with governments and policymakers on issues relating to the Code and BMS marketing. The company should also commit to not undermining existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code in full. In addition, the company should have controls in place over trade associations and industry policy groups and should prohibit conflict of interest when engaging with stakeholders on BMS marketing.

#### **Management System**

- ATNI was unable to identify documentation about any management systems the company has in place to implement any policy it may have in relation to engaging with stakeholders on BMS marketing.
- To score in this area, Vinamilk would need to clearly assign executive responsibilities and oversight to ensure the effective implementation of its policy on engaging with stakeholders on BMS marketing and the Code, as well as develop clear systems and control mechanisms such as reporting and internal audits.



Highest score (Danone)

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### 11. Disclosure

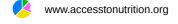
This topic consists of disclosure indicators only.



Average score
Highest score (FrieslandCampina)

#### Disclosure

- As ATNI was not able to identify any information in the public domain relating to Vinamilk's policy, management systems, lobbying activities or its accountability mechanisms related to BMS marketing, the company did not score on this topic.
- In addition to developing and having a comprehensive company
  policy dedicated to the responsible marketing of breast-milk
  substitutes, if the company does not already have one, Vinamilk is
  encouraged to have its commitments available and easily accessible
  in the public domain.



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#### **Footnotes**

- 1. BMS stands for breast-milk substitutes which include any milks (or products that could be used to replace milk, such a s fortified soya milk alternatives), in either liquid or powdered form, that are specifically marketed for feeding infants an d young children up to the age of three years. These include: Infant formula (IF) Follow-up formula (FUF) Growing-up milk (GUM) It is important to note that the Code never made exceptions to formulas for special medical purposes th erefore these products are also included within the scope of ATNI's studies. Bottles and teats however are not include d in ATNI's assessments as these products generally would not be manufactured by food and beverage companies.
- 2. 33% of Vinamilk's global baby food sales are derived from complementary foods.
- The Country Study score and Corporate Profile score each contribute to 50% of Vinamilk's BMS Marketing Index score.
- 4. This represents the score of one country assessment: Viet Nam.
- 5. Based on 2021 Euromonitor retail sales estimates.
- 6. Incidences of non-compliance include non-compliant labels and observations from online and traditional media.
- 7. Where companies engaged, these numbers should represent the number of products confirmed to be marketed in the se countries as communicated by the companies to ATNI. It is possible however that the number of products and bran ds assessed are not representative of each of the assessed markets, due to limitations in data collection and limited company engagement.
- 8. Infant formula is a BMS product intended for infants younger than six months of age. Follow-up formula is a BMS product intended for older infants between six months up to one year of age. Growing-up milks or toddler milks are B MS products intended for young children between one to three years of age. Product brand relates to observations where no age is specified on a product or no specific product is promoted, but the observation is associated with a BMS brand.
- 9. This is the company's average score on the 11 topics.
- 10. Euromonitor retail sales estimates (2021 data) were used to calculate the proportion of companies' global product sale s covered per product type. It is important to note however that the underlying data used for the calculations may not be fully representative of the company's markets. Euromonitor International intelligence is used under license. Although Euromonitor aims to correct inaccuracies of which it is aware, it does not warrant that the data will be accurate, up-to-date or complete as the accuracy and completeness of the data and other content available in respect of different parts of the content will vary depending on the availability and quality of sources on which each part is based.
- 11. Product weighting: 45%
- **12.** Product weighting: 35%
- 13. Product weighting: 20%

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