

# Abbott

**Headquarters**  
United States

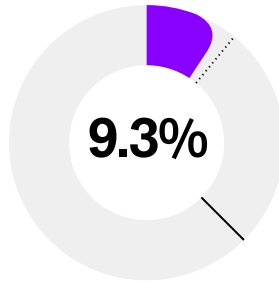
**Type of ownership**  
Public

**Estimated percentage of Abbott's global F&B sales from BMS** ⓘ<sup>1</sup>  
96%

**Estimated percentage of Abbott's global baby food sales from BMS** ⓘ<sup>2</sup>  
100%

**Countries covered in country studies**  
Indonesia/US/Viet Nam

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**BMS Marketing Score 2024** ⓘ<sup>3</sup>

— Average score  
| Highest score



**Country Studies Score** ⓘ<sup>4</sup>

0% 3 countries



**Corporate Profile Score**

18.5%

**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.

# BMS Country Studies



Country Studies  
Score

0% 3 countries

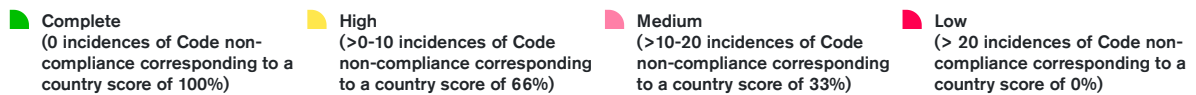
The Country Studies component of the BMS and CF Marketing Indexes 2024 evaluates the extent to which a company's marketing practices align with specific provisions of the WHO Code (not against local Code-related regulations). The main marketing channels assessed in the Country Studies for the BMS and 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. Abbott sells BMS products in three (Indonesia, US and Viet Nam) of the five countries selected for the assessment, which altogether represent >50% of Abbott's estimated global BMS sales. In 2023, Abbott closed its infant and children nutrition business operations in China, therefore the company was not assessed in this country. The Country Studies results for Abbott are summarized below for each country and across each marketing channel.

<https://new-140rlzsq.accessnutrition.org/app/uploads/2024/03/Assessment-methods-and-scoring.pdf>

# Country Studies overview

Abbott	Country assessments			BMS market <sup>1 5</sup>	
	Total incidences of non-compliance across online, traditional media, and product labels <sup>1 6</sup>	Number of product labels assessed <sup>1 7</sup>	Company brands found	BMS market share	Proportion of Abbott'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	42	1	PediaSure	<5%	<5%
US	50	36	PediaSure, Similac	43%	48%
VIET NAM	50	16	Similac	26%	6%

## Code compliance level



- A total of 142 incidences of non-compliant marketing practices for BMS products were found for Abbott. Incidences of non-compliance were found across online and traditional media channels assessed in the three countries and a total of 53 product labels were assessed of various Abbott brands.

- In Indonesia, Abbott's BMS sales represents a relatively small proportion of the Indonesian BMS market, and it also represents a small part of Abbott's global BMS sales (less than 5%). Still, a total of 35 advertisements and promotions related to PediaSure were found online during the research period and 6 TV advertisements. One product label was assessed which contained 13 instances of non-compliance on that label.

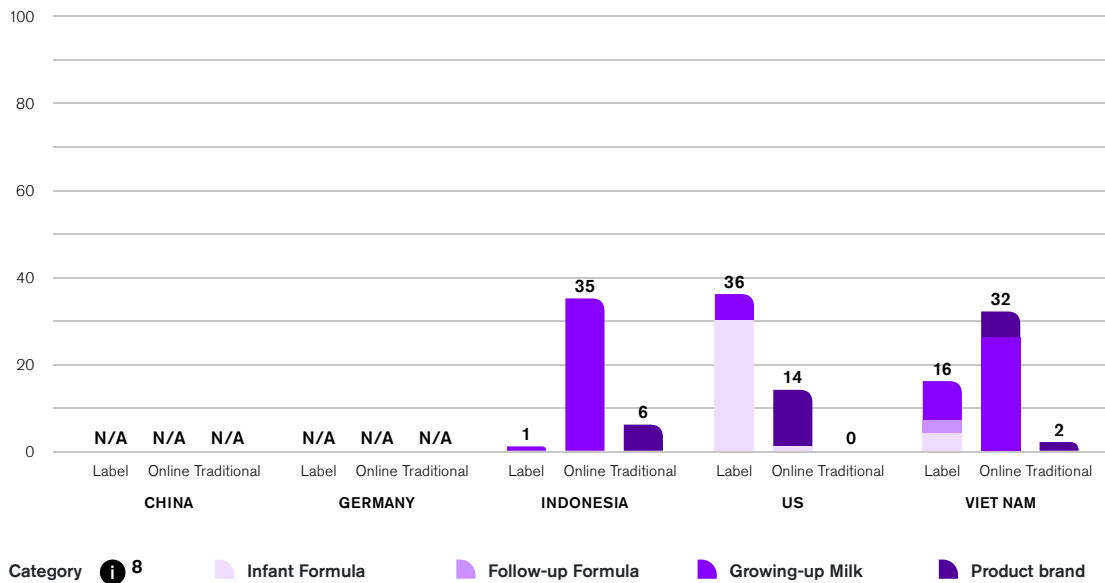
- Abbott is one of the two major BMS companies in the

US, with a share representing over 40% of the market, and accounting for almost 50% of its global BMS sales. The US is also the market in which the highest number of product labels were assessed for Abbott, all 36 labels assessed contained one or more instances of non-compliance. A total of 50 incidences of non-compliance were found, of which 14 were found on online media channels.

- While Abbott's BMS sales in Viet Nam represent less than 10% of the company's global BMS sales, the company possesses a notable share of the Vietnamese BMS market (approximately 26%). 32 advertisements and promotions related to BMS brands were found online during the research period; all 16 product labels assessed contained one or more instances of non-compliance.

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

Absolute number of incidences of non-compliance



## Main in-country findings

Abbott's highest number of incidences of non-compliant marketing practices were found in Viet Nam and the US (50 each), followed by Indonesia (42).

Across all country assessments, the majority of incidences of non-compliance (81 out of 142) for Abbott were identified through the social listening of online platforms, while fewer were identified on traditional media (8). Each of the 53 BMS product labels assessed from various Abbott brands contained one or more instances of non-compliance. The incidences of non-compliance found online were largely concerning growing-up milks, whereas advertisements on traditional media concerned brand promotions and non-compliant labels were found across all types of BMS.

### Online findings

- The majority of advertisements and promotions related to Abbott's BMS brands online (81 in total) were found in Indonesia (35), followed by Viet Nam (32) and the US (14), all of which are contraventions of the Code.
- Among the total incidences of non-compliance found online, only six related to point-of-sale promotions found on online retailers in the US and Viet Nam (two and four respectively), mainly in the form of advertisements, discounts and gifts, and endorsements. Although promotions of Abbott BMS products were found on the online retailer websites monitored in Indonesia, the company informed ATNI it had no contractual relationship with these retailers, thus the findings were excluded. In Viet Nam, these promotions were associated with BMS products aimed at children aged 1 to 10 years, while in the US, these included an infant formula for ages 0 to 12 months and unspecified age group.
- The remaining 75 observations were found on the company's local websites and social media platforms, with the highest number of findings in Indonesia (35), followed

by Viet Nam (28) and the US (12). Across all three countries, an average of two incidences of non-compliance were identified with each observation. Apart from advertising BMS – a non-compliance with the Code in itself – other common incidences found with those advertisements included incentivizing the purchase of those products through offering vouchers or coupons (observed in Indonesia), as well as providing education and information about infant and young child nutrition and feeding and soliciting caregivers to sign-up to online contests found mainly in Viet Nam. The majority of advertisements also included claims, ranging from 67% of the identified advertisements in the US containing at least one type of claim to 86% in Indonesia and 100% in Viet Nam.

### Traditional media findings

- In total, eight BMS advertisements by Abbott were identified on television, six in Indonesia and two in Viet Nam. All eight observations concerned BMS products where the targeted age was not clearly indicated, and all had at least one type of claim. No advert was found of

Abbott BMS products in the US in the six-month period the selected channels were monitored.

### **BMS product label**

- A total of 53 of Abbott BMS products were assessed across the three markets, of which were 36 in the US.
- No product labels were found to be fully Code-compliant, and each label contained at least one incident of Code non-compliance. In the US and Viet Nam, an average of six incidences of non-compliance per product label were identified, while the only label assessed in Indonesia included 13 observations of non-compliance.
- Almost all of the labels (50 out of 53) 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. All of the labels contained a nutritional, health and/ or marketing claim. Most of the labels assessed (48 out of 53) did not state the need to only use the product on the advice of a health professional before deciding to feed with formula, irrespective of the age at which formula is introduced. The US was the only country where Abbott BMS labels recommended feeding the product in a bottle for 12 out of 36 labels assessed.

- It is worth noting that ATNI's research was based on product label images from an external data 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. Abbott provided images of all product labels (as requested by ATNI) to help complete the assessments, therefore all assessments are completed.

## **Recommendations**

- With a total of 142 incidences of non-compliant marketing practices for Abbott BMS products observed across the three markets assessed, the company is strongly encouraged to strengthen its 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.
- Abbott is urged to restrict the advertising and promotion of all types of BMS products and brands on all forms of media platforms globally. The company should also refrain from soliciting contact with caregivers and providing education and information on infant and young child feeding across all platforms.
- Abbott 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.
- Abbott is encouraged to look for ways to engage with their 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 across the three countries were found to be non-compliant with Code requirements in at least one aspect, Abbott is encouraged to focus on improving labeling practices across all markets following the Code and all subsequent relevant resolutions, including the guidance supported by WHA resolution 69.9. This includes ensuring that product labels include the appropriate statements promoting the importance of exclusive breastfeeding for the first six months and continued breastfeeding up to two years or beyond and, that labels do not include health or nutrition claims, except if specifically provided for in national legislation.
- Clear evidence was found of Abbott 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 Abbott to ensure its commitments are extended to include growing-up milks in all markets.
- ATNI is calling on Abbott 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 in each of the markets.

# BMS Corporate Profile



Corporate Profile  
Score

18.5%

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. Abbott's BMS marketing commitments were assessed across 11 topics that cover different aspects of the Code on which the company scored an average of 36%. 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 Abbott 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://new-l40rlzsq.accessnutrition.org/app/uploads/2024/03/Geographic-penalty.pdf>

# Geographic application by Abbott 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.

Corporate Profile score before penalty <sup>i 9</sup>	Product type	Percentage of Abbott's global sales from markets where BMS commitments are upheld <sup>i 10</sup>	Geographic penalty applied	Final Corporate Profile score
35.9%	Infant formula <sup>i 11</sup>	79%	18.9%	18.5%
	Follow-up formula <sup>i 12</sup>	30%	63%	
	Growing-up milk <sup>i 13</sup>	0%	90%	

## 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

ATNI referred to Abbott's 2023 Global Policy on the Marketing of Infant Formula that was confidentially shared with ATNI to assess how the company's BMS marketing commitments are upheld for each product type and in which markets. Euromonitor retail sales estimates were used to calculate the proportion of Abbott's global product sales covered per BMS product type.

### Infant formula

The company upholds its commitments for infant formula globally, even where local Code regulations are absent or weaker than the company policy.

Abbott continues, however, to exclude these commitments from infant formulas for special medical purposes. Thus, commitments for infant formula products are upheld globally, but this only represents 79% of the company's global infant formula sales due to the exclusion of some types of infant formula which are for special medical purposes. The corresponding geographic penalty for this product type is 19%.

The Code does not distinguish between the different types of infant formulas, therefore its provisions apply to all product types. To further improve the scope of the company's policy, ATNI encourages Abbott to cover all infant formulas, without exception, including formulas for special medical purposes.

### Follow-up formula

The company only upholds its commitments for this product type in higher-risk countries, even if local Code

regulations are absent or weaker than the company policy in those countries.

Abbott also excludes these commitments from follow-up formulas for special medical purposes.

Thus, commitments for follow-up formula products are only upheld in higher-risk markets, and for products that are not for special medical purposes, which represents 30% of the company's global follow-up formula sales. The corresponding geographic penalty for this product type is 63%.

To further improve the scope of the company's policy, ATNI encourages Abbott to cover all follow-up formulas, without exception, including formulas for special medical purposes, and in all markets.

### Growing-up milk

The company does not apply its BMS marketing commitments to growing-up milks. This is evident from the country assessments where the majority of the observed incidences of non-compliance were attributed to growing-up milk products.

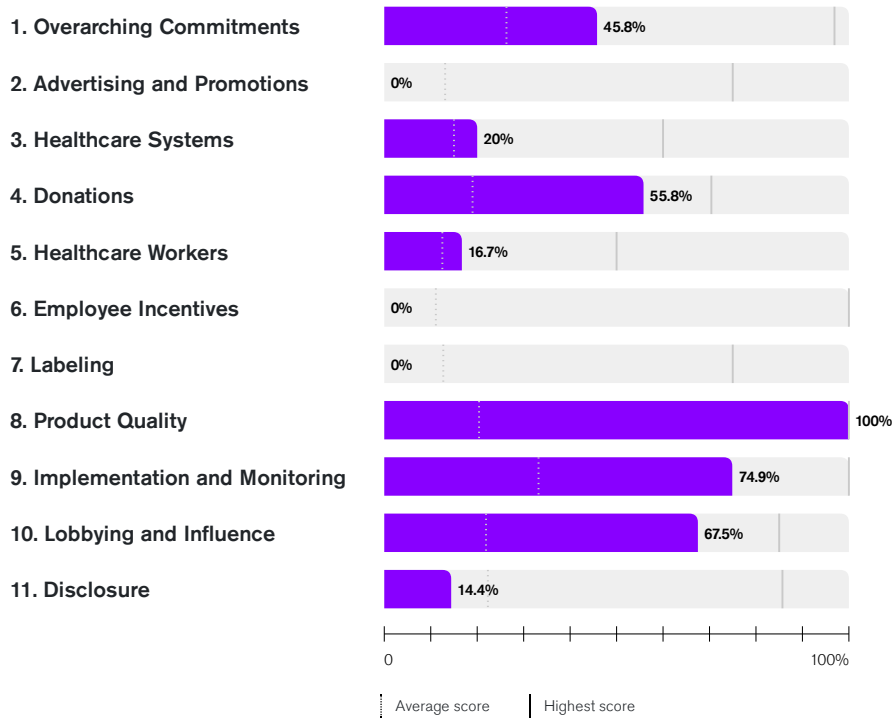
The corresponding geographic penalty for this product type is the maximum of 90%.

ATNI calls on Abbott to consider the expanded definition of the Code, following the World Health Assembly resolution 69.9 recommendations, to cover any milk

products up to three years of age.

Based on the company's application of its BMS commitments to the different BMS product categories across its global markets, the final Corporate Profile score is 18%.

## Topics Overview



These represent the initial overall scores before applying the penalty.

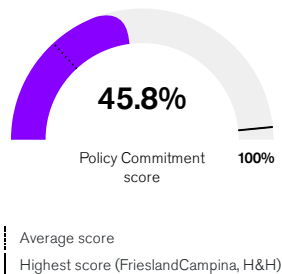


# BMS commitments by topic

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.

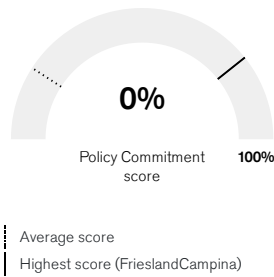


### Policy Commitment

- Abbott's overarching commitments to the Code had not changed since the 2021 assessment. The company continues to clearly state its support for exclusive breastfeeding in the first six months and continued breastfeeding to two years or beyond, as well as for the introduction of appropriate complementary foods from the age of six months.
- Although compared to the other companies assessed, Abbott's overarching commitments are relatively well-aligned with the principles of the Code, the company still does not fully acknowledge the specifications to the Code provided by the World Health Assembly (WHA) in resolution 69.9 and the accompanying guidance on ending the inappropriate promotion of foods for infants and young children. WHA resolution 71.9, which calls for continued implementation of the recommendations of this guidance has not been acknowledged by the company either.
- Abbott did not receive a full score on the new indicator that assesses whether companies apply their BMS marketing commitments to all types of formula, including formulas for special medical purposes. While the company does not consider products intended for the treatment of medical conditions as breast-milk substitutes, the Code regards all formulas for infants and young children as BMS, whether used to meet the normal nutritional or special medical needs of infants.

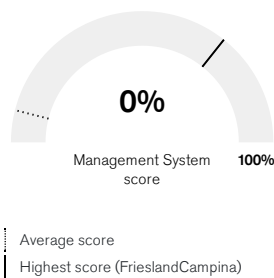
## 2. Advertising and Promotions

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.



### Policy Commitment

- Abbott did not score on this topic since, in its BMS Marketing policy, it allows the advertising and promotion of BMS products to the general public, as well as the supply of educational and instructional materials through healthcare systems. Furthermore, Abbott's BMS Marketing Policy mentions policies and procedures for employee and partner interactions with healthcare professionals and consumers, which are all actions that are not permitted according to the Code under any circumstances.
- 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.
- Abbott is encouraged to adopt these Code requirements and clearly outline them in its BMS marketing policy.

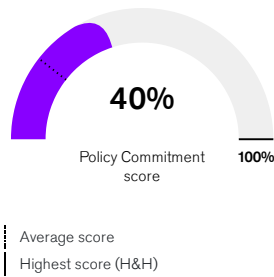


### Management System

- Abbott shared – under non-disclosure agreement (NDA) – local staff training material and procedures developed by the company to guide its employees on the marketing of BMS. However, the company did not score on management systems as it did not meet the policy commitments in the first place.
- Abbott is encouraged to adopt the Code requirements and to develop clear and comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its updated policy(ies) relating to responsible BMS marketing in all markets.

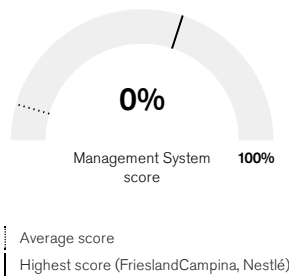
## 3. Healthcare Systems

**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.**



### Policy Commitment

- Abbott's policy commitments relating to marketing BMS throughout the healthcare system, which are only partially aligned with the requirements of the Code, have not changed since the 2021 assessment.
- Compared to the last assessment in 2021, indicators were slightly revised to ensure an accurate assessment of recommendation 6 of the guidance supported by WHA resolution 69.9 to evaluate whether companies have explicit commitments in place not to use health facilities to host events of any kind nor to give out gifts or any other offering to caregivers of infants and young children, to avoid conflicts of interest. Similar to the 2021 assessment, and like most of the BMS companies assessed in this Index, Abbott did not score on the indicators that capture these Code commitments that specifically relate to WHA resolution 69.9. In this iteration, the company also did not score on commitments to forbid its staff from demonstrating formula feeding.
- Abbott is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code.

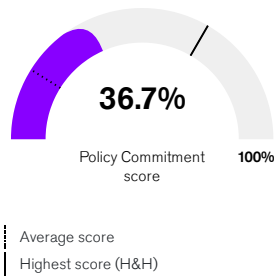


### Management System

- Abbott shared – under NDA - some local guidance and procedures developed by the company to guide its employees on the marketing of BMS throughout the healthcare system as outlined in the company's related policy(ies). The company does not score on management systems as it does not have all Code provisions in place. Moreover, the material shared was not found to include any relevant training material that covers the implementation of the company's commitments on marketing BMS throughout the healthcare system.
- Abbott is encouraged to update its management systems, procedures, and other guidance to include training material that consistently and comprehensively cover the implementation of the company's commitments on marketing BMS throughout the healthcare system.

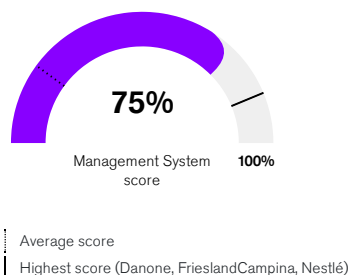
## 4. Donations

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.



### Policy Commitment

- Abbott's policy commitments relating to BMS donations within the healthcare system, in humanitarian settings and emergencies, and in social welfare institutions are partially aligned with the requirements of the Code.
- Compared to the last assessment in 2021, commitments on donations of BMS are now assessed in a separate topic and across several indicators, to ensure a more accurate assessment of the specific requirements relating to BMS donations.
- In regard to BMS donations, Abbott does not comply with the Code, specifically recommendation 6 of the guidance supported by WHA resolution 69.9, as its BMS Marketing policy states that the company may provide free or low-cost supplies of the BMS product, as well as equipment or material, to healthcare institutions.
- Based on its BMS marketing policy together with company-wide donation procedures that were confidentially shared by the company, Abbott showed commitment to meeting most of the required criteria for BMS product donations in emergencies, such as ensuring that distribution is targeted and not delivered directly to caregivers, and that supplies are based on identified need and are not expired or close to expiry, but it was not found to commit to ensuring that donated BMS products will not display company brands. Furthermore, the company does not explicitly state that requests for BMS donations may only be considered if officially requested by government bodies or national coordination structures in humanitarian settings and emergencies.
- The company commits not to distribute BMS product donations or low-cost supplies for use outside of the social welfare institutions where infants and young children require them and prohibits using such donations as a sales inducement.
- Abbott is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code.

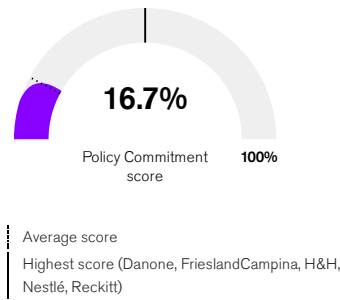


### Management System

- Abbott confidentially shared some local procedure manuals and company-wide donation procedures developed by the company to guide its employees on the marketing of BMS, as outlined in the company's related policy(ies). The company does not fully score on management systems since it does not have all Code provisions in place. However, in regard to the commitments met by the company on donations that are in line with the Code, the guidance provided by the company to follow and apply these commitments is clear and consistent across markets, thus Abbott scores on those elements.

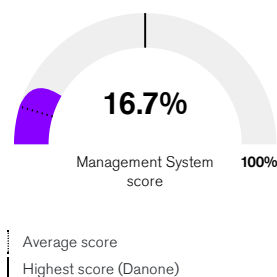
## 5. Healthcare Workers

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.



## Policy Commitment

- Abbott's policy commitments relating to marketing BMS to healthcare workers, which are only partially aligned with the requirements of the Code, have not changed since the 2021 assessment.
- Compared to the last assessment in 2021, a new indicator was introduced for this topic to specifically assess the instructions provided to healthcare workers on the appropriate preparation of powdered formulas and if these are based on WHO/FAO guidelines and Codex Standards as referenced by WHA resolutions 58.32 and 61.20. Abbott did not score on this indicator and none of the 18 companies assessed met this requirement.
- Abbott is one of seven companies out of the 18 assessed to explicitly state that any information regarding BMS products provided to health workers will be restricted to scientific and factual matters, as per the requirements of the Code. However, the company did not score on any other indicator in this topic.
- Two other indicators were slightly revised to ensure an accurate assessment of recommendation 6 of the guidance supported by WHA resolution 69.9 to evaluate whether companies have explicit commitments in place not to offer any financial or material inducements (no gifts or incentives of any form or value) to healthcare workers or their families, and not to sponsor any scientific meetings, fellowships, study tours, and research grants for health professionals, to avoid conflicts of interest. Similar to the 2021 assessment, and like most of the BMS companies assessed in this Index, Abbott did not score on these indicators that capture the Code commitments that specifically relate to WHA resolution 69.9.
- Abbott is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code, specifically Article 7 and recommendation 6 of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA 69.9.



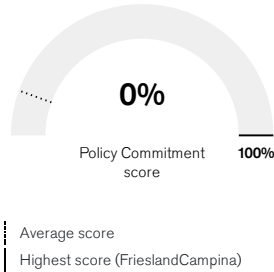
## Management System

- Abbott shared – under NDA - some local policies and procedures developed by the company to guide its employees on the marketing of BMS as outlined in the company's related policy(ies). The company does not fully score on management systems as it does not have all Code provisions in place. However, in regard to the commitments met by the company on marketing BMS to healthcare workers that are in line with the Code, the guidance provided by the company to follow and apply these commitments is clear, thus Abbott scores on those elements. However, these can be improved by providing clear instructions on what company personnel should or should not do in each context to uphold commitments related to financial or material inducements and sponsorship, as well as procedures for all provisions related to information provided to health workers.

## 6. Employee Incentives

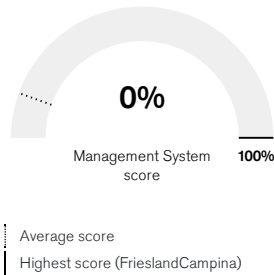
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

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### Policy Commitment

- Abbott does not explicitly exclude the sales of BMS products from bonus calculations for sales representatives. Therefore, the company is not aligned with the requirements of the Code, which explicitly states that incentive measures should not include the volume or sales values of BMS products, regardless of whether they are considered individually or alongside other product sales. Additionally, the company did not confirm if existing requirements related to employee incentives apply to all markets of operation irrespective of local regulations.
- Abbott is encouraged to address the gaps identified to revise its policy to align with the requirements of the Code, specifically Article 8.



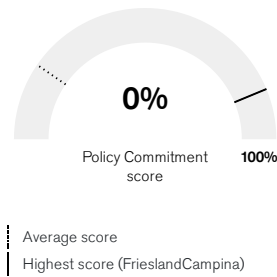
### Management System

- Abbott confidentially shared some local procedure manuals and management systems developed by the company to guide its employees on the marketing of BMS as outlined in the company's related policy(ies). The company did not score on management systems as its policy commitments are not in line with the Code. Additionally, Abbott should reinforce its management systems to deliver consistent compliance with its stated commitments across all countries, once brought into full alignment with the Code.

## 7. Labeling

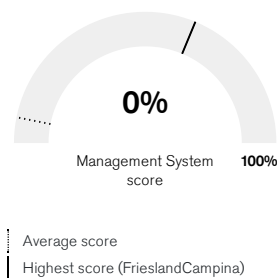
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

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### Policy Commitment

- Abbott's policy commitments relating to the labeling of BMS products have not changed since the 2021 assessment and were not found to be aligned with the requirements of the Code. Therefore, the company does not score on this topic.
- Compared to the last assessment in 2021, the information required by the Code on labels of powdered formula are assessed in more detail to evaluate whether companies have specific commitments covering each requirement as per WHA resolutions 58.32 and 61.20. No relevant information was found nor shared by the company showing Abbott's commitments for powdered formula label requirements.
- Commitments were found in Abbott's BMS Marketing Policy showing that labels of its BMS products will include some but not all of the Code requirements described in Article 9, such as committing to providing necessary information regarding appropriate use of the product, ingredients/composition used, storage conditions, batch number and date for safe consumption, amongst others, but no commitments were found for example to ensure that the information is provided in the appropriate local language(s) and that warnings are included against the health hazards of inappropriate preparation.
- Abbott did not commit to state on all BMS product labels/inserts the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond, nor the appropriate age range for consumption and for introduction as required by recommendation 4 of the guidance supported by WHA resolution 69.9. Other missing requirements include prohibiting the use of endorsements by health professionals and any health or nutrition claims unless required by local legislation.
- Abbott is encouraged to consider the gaps identified to revise its policy to fully align with the requirements of the Code, specifically outlined in Article 9 and recommendation 4 of WHA resolution 69.9.

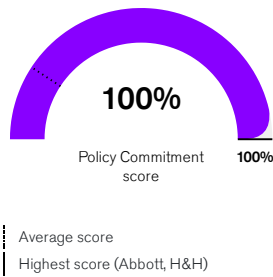


### Management System

- No relevant documentation was found or shared by the company of any management systems the company has in place to implement its BMS marketing commitments related to labeling.
- To score in this area, Abbott 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 this topic.

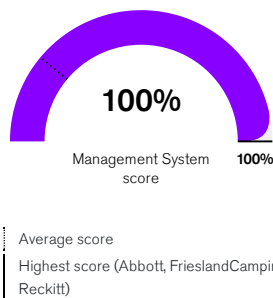
## 8. Product Quality

**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.**



### Policy Commitment

- Compared to the BMS/CF Marketing Index 2021, companies' commitments on this topic are evaluated in more detail to ensure their commitments relating to Article 10 of the Code are accurately assessed.
- Abbott was one of the four companies among the 18 assessed that showed full alignment with the Code for what concerns product quality commitments, since the company specified all the Codex standards relating to BMS products that apply at a minimum to ensure quality and hygiene within its products in all markets.
- Abbott is encouraged to ensure that the listed standards are regularly revised so that the most updated versions are adhered to.

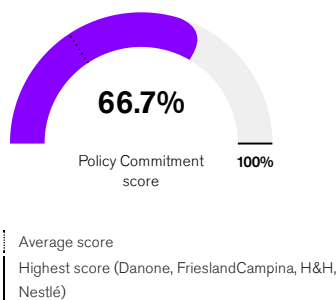


### Management System

- Abbott confidentially shared the quality manual developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy(ies). The company was one of four companies among the 18 assessed found to have clear procedures for implementing the applicable Codex standards that the company has explicitly listed.

## 9. Implementation and Monitoring

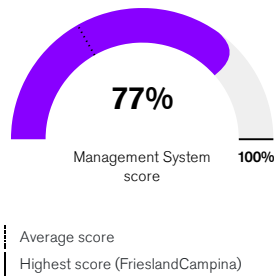
This topic consists of policy commitment indicators and management system indicators. The policy commitment indicators contribute to 20% of the topic score, while 80% of the weight of the score is attributed to management system indicators.



### Policy Commitment

- Abbott's policy commitments relating to the implementation and monitoring of its marketing practices to the principles of its BMS marketing policy have not changed since the 2021 assessment and were found to be well-aligned with the requirements of the Code.
- Based on Abbott's BMS Marketing policy, the company was found to have commitments in line with Article 11 of the Code and commits to apprising marketing personnel of its BMS marketing policy(ies) and their responsibilities relating to it.
- However, no explicit commitments were found for Abbott stating that the company would support and not undermine efforts made by governments and international bodies in the adoption of legal frameworks that are fully aligned with the Code. Therefore, the company did not fully score on this topic



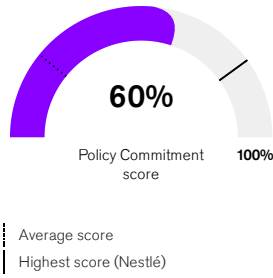


## Management System

- Although Abbott did not fully score on this topic, its management systems and procedures have moderately improved since the 2021 assessment.
- Based on Abbott's BMS Marketing Policy and documentation of management systems shared - under non-disclosure agreement - the company was found to clearly assign executive responsibilities for the implementation of its BMS marketing policy(ies), however, no clear evidence was provided of a system to ensure that relevant executives are aware of these responsibilities.
- Abbott also confidentially shared global and local procedures that demonstrate that the company communicates to its employees and contractual third-parties (distributors and retailers) their responsibilities in implementing the company's BMS marketing policy, and outlines a clear set of sanctions and penalties for employees who do not comply with its BMS marketing commitments. The company was also found to have an internal and external allegation system to report on non-compliance with its BMS Marketing Policy, and clear guidelines to employees and contractual third parties to take necessary corrective action. However, no relevant procedures were identified for this assessment to track corrective action taken by employees and third parties. In addition, the company did not clearly demonstrate management systems in place concerning the effectiveness of its internal reporting systems of identified incidents of non-compliance. Although Abbott mentioned conducting annual internal audits, it confirmed that they do not conduct external audits of its marketing practices.
- 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 BMS products, such as FSSC 22000, ISO 22000 and HACCP, which was clearly evidenced in Abbott's 2021 sustainability report.
- Abbott is encouraged to adopt effective company-wide governance, auditing, and management arrangements to ensure that the policy and systems work effectively.

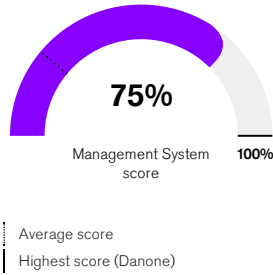
## 10. Lobbying and Influence

**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.**



### Policy Commitment

- For this assessment, Abbott's policy commitments relating to lobbying and policy influence, which also apply to engaging on issues relating to BMS and the Code, were based on the company's Corporate Political Participation section of its website. The company did not fully score on this topic.
- Some commitments were found for Abbott where it states that the purpose of all lobbying is to support the public interest as well as to meet the company's objectives, and that it reviews the positions of trade associations and industry policy groups it belongs to and assesses the extent to which they align with the company's own policy positions.
- However, it does not explicitly commit to ensure control over all lobbyists to ensure their understanding and adherence to organisational policies, nor to support and not undermine existing policy frameworks, the work of WHO and government efforts to develop regulations to implement the Code in full.

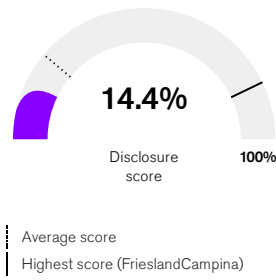


### Management System

- Based on Abbott's Corporate Political Participation webpage, the company states that the Board has oversight of Abbott's lobbying principles, positions and activities. The company also provides information on control mechanisms including regular reporting to the Board and internal audits. However, no information was found regarding executive responsibilities to implement Abbott's commitments on lobbying and stakeholder engagement.

## 11. Disclosure

This topic consists of disclosure indicators only.



## Disclosure

- Abbott did not fully score on this topic as there was limited information in the public domain on the company's BMS marketing commitments and related accountability mechanisms.
- Compared to the 2021 assessment, Abbott's revised 2023 BMS Marketing Policy was not publicly available at the time of the assessment.
- Some information was found however on the company's website clearly stating its support for breastfeeding, as well as a published list of some of the trade associations and industry groups the company is a member of, related to BMS.
- Since the last BMS/CF Marketing Index 2021, a few indicators have been added to further assess companies' level of disclosure in lobbying on BMS marketing issues and the Code. Similar to the 2021 assessment, Abbott falls short in disclosing lobbying-related activities. No information was found in the public domain of an assessment of the company's compliance with its policy on lobbying and interactions with public authorities. Like most companies assessed in this iteration, no information was found either on Abbott's website of its interactions, or that of its trade associations, in legislative processes related to the Code and BMS marketing, nor of links to relevant external platforms that may include this information. ATNI also advises the company to follow key public policy frameworks in private sector engagement and lobbying such as the Code, the WHO framework of engagement with non-state actors and OECD principles for transparency and integrity in lobbying, among others, which the company was not found to publicly refer to.
- Abbott is encouraged to have its BMS marketing commitments available and easily accessible in the public domain and improve its disclosure in various aspects relating to the Code and responsible marketing, including lobbying and accountability.

## Footnotes

1. BMS stands for breast-milk substitutes which include any milks (or products that could be used to replace milk, such as fortified soya milk alternatives), in either liquid or powdered form, that are specifically marketed for feeding infants and 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 therefore these products are also included within the scope of ATNI's studies. Bottles and teats however are not included in ATNI's assessments as these products generally would not be manufactured by food and beverage companies.
2. All of Abbott's global baby food sales are derived from breast-milk substitutes.
3. The Country Study score and Corporate Profile score each contribute to 50% of Abbott's BMS Marketing Index score.
4. This represents the average score of three country assessments: Indonesia, US, 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 these countries as communicated by the companies to ATNI. It is possible however that the number of products and brands 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 BMS 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 sales 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%