

Kraft Heinz

Headquarters
United States

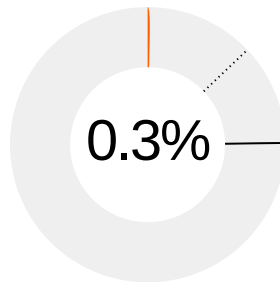
Type of ownership
Public

Estimated percentage of Kraft Heinz's
global F&B sales from CF ①¹
3%

Estimated percentage of Kraft Heinz's
global baby food sales from CF ①²
97%

Countries covered in country studies
China/Indonesia

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CF Marketing
Score 2024 ①³

Average score
Highest score



Country Studies
Score ①⁴

0% 2 countries



Corporate Profile
Score

0.5%

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.

CF COUNTRY STUDIES



Country Studies
Score

0% 2 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. Kraft Heinz sells CF products in two (China and Indonesia) of the five countries selected for the assessment, which altogether represent approximately 36% of Kraft Heinz's estimated global CF sales. The Country Studies results for Kraft Heinz are summarized below for each country and across each marketing channel.

<https://new-l40rlzsq.accessnutrition.org/app/uploads/2024/03/Assessment-methods-and-scoring.pdf>

Country Studies overview

| Kraft Heinz | Country assessments | | | CF market ^{1 5} | |
|-------------|--|--|----------------------|--------------------------|---|
| | Total incidences of non-compliance across online, traditional media, and product labels ^{1 6} | Number of product labels assessed ^{1 7} | Company brands found | CF market share | Proportion of Kraft Heinz's global CF sales |
| CHINA | 29 | 6 | Heinz | 8% | 34% |
| GERMANY | N/A | N/A | N/A | N/A | N/A |
| INDONESIA | 36 | 7 | Heinz Baby | 8% | 2% |
| US | N/A | N/A | N/A | N/A | N/A |
| VIET NAM | N/A | N/A | N/A | N/A | N/A |

Code compliance level

| | | | |
|--|---|--|--|
|  Complete (0 incidences of Code non-compliance 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 non-compliance corresponding to a country score of 0%) |
|--|---|--|--|

- A total of 65 incidences of non-compliant marketing practices for Kraft Heinz CF products were found. Non-compliant marketing practices were found across online media channels assessed in both countries and a total of 13 CF product labels were assessed from various Kraft Heinz CF brands.

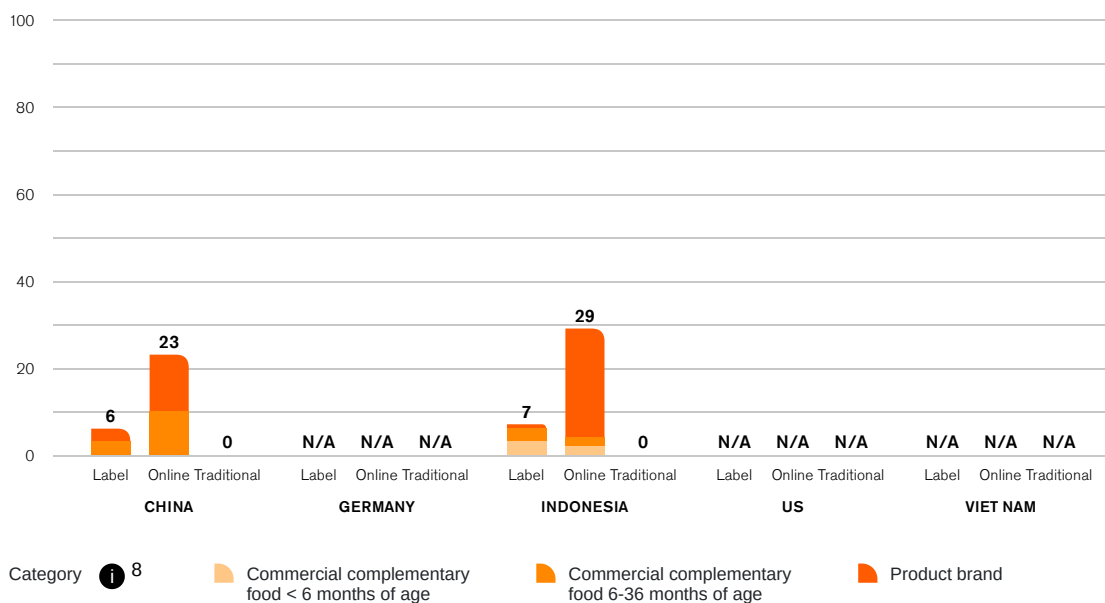
- In China, where Kraft Heinz CF sales account for approximately 8% of the total Chinese CF market and approximately 34% of the company's global CF sales. A total of 29 incidences of non-compliance were found,

of which 23 were within online media channels. All six product labels assessed contained one or more instances of non-compliance.

- In Indonesia, Kraft Heinz also has approximately 8% of the CF market, while it only represents approximately 2% of the company's global CF sales. In total, 36 incidences of non-compliance were found, and all seven CF products 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

Kraft Heinz's highest number of incidences of non-compliant marketing practices were found in Indonesia (36), followed by China (29).

Across the two countries assessments, most incidences of non-compliance observed for Kraft Heinz were identified through the social listening of online platforms (52), followed by inappropriate product labels (13). No incidences of non-compliance were found in traditional media in the six-month period the selected channels were monitored.

From all 65 incidences of non-compliance found for Kraft Heinz, five CF products were explicitly intended for infants below six months of age. According to the WHO, these products should not be available on the market and were counted as incidences of non-compliance. There were also 42 CF products found that had no clear age of introduction specified. The remaining 18 observations from commercial complementary foods were clearly marketed as suitable for older infants and young children between six months and up to three years of age.

Online findings

- Among the total incidences of non-compliance found online (52), eight were non-compliant online point-of-sale promotions of Kraft Heinz's CF products from online retail channels, mainly in the form of discounts and coupons. No online point-of-sale promotions were found of Kraft Heinz's CF products in Indonesia in the eight-week period the channels were monitored. All point-of-sale promotions assessed were missing the statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. All online point-of-sale promotions found included all three types of nutrition, health, and marketing claims. However, is good to note that they all had a clear recommended age of introduction.

- The remaining 44 non-compliant observations were found on the company's local websites and social

media platforms, with the higher number of findings in Indonesia (29), followed by China (15).

- Across Indonesia and China where online adverts of Kraft Heinz's CF products were found, an average of two and three, respectively, incidences of non-compliance were identified with each observation. All the online media adverts were missing the statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. Most of the online media adverts found in China (12 out of 15) and Indonesia (25 out of 29) did not clearly indicate the recommended age of introduction. In addition, six observations of the online media adverts for Kraft Heinz CF products (four in China and two in Indonesia) were found to contain an element which undermined or discouraged appropriate complementary feeding, suggesting the product is superior to home prepared

foods. For example, statements were found suggesting that the preparation of complementary foods is “a big hurdle”, “homemade purées are not necessarily safer”, and a post was showing children sucking directly from a CF product pouch which is against WHO recommendations.

- Other common incidences of non-compliance found with the online advertisements of Kraft Heinz’s products included the provision of information and education on infant and young child feeding. Additionally, the company was found to contract health professionals to provide education on infant and child nutrition, which poses a conflict of interest as per recommendation 6 of the guidance supported by WHA 69.9 resolution.

- From the online media channels 87% of the non-compliant adverts found in China contained a claim which were mainly from marketing claims, followed by nutritional and health claims. In contrast, from the online media adverts found in Indonesia, 41% contained claims, which were mainly marketing claims, followed by health and nutritional claims.

Traditional media findings

- There were no observations in China or Indonesia of Kraft Heinz CF promoted on traditional media in the six-month period the selected channels were monitored.

CF product label

- The total number of Kraft Heinz CF products assessed were seven in Indonesia and six in China.
- In total three products in Indonesia were found to be marketed as suitable for infants under six months of

age, this product was not assessed as it should not be available on the market marketed according to the WHO. Therefore, the following results are for CF 6-36 months and those with no clear age indicated.

- For all the remaining Kraft Heinz product labels assessed, at least one incidence of Code non-compliance was observed. The average number of incidences of non-compliance per product label per market was three in both China and Indonesia.

- For the product labels assessed in Indonesia, three out of the remaining four products were labelled in English with no information stated in the local language, therefore not committing to the Code recommendations for CF to be in the local language of the consumers to ensure awareness of the product and its appropriate use.

- All of Kraft Heinz’s CF product labels assessed in China and Indonesia 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. They were also found to have at least one type of claim (nutritional, health and/or marketing claim).

- It is worth noting that ATNI did not have the resources to collect products from the different markets and take pictures of their labels. For this assessment ATNI used product label images from an external provider. For some products, images were not clear enough or did not show all parts of the package, in these cases ATNI asked the respective companies to provide images of the labels. Kraft Heinz provided images of product labels to help complete the assessments, therefore the assessment of all products is complete.

Recommendations

- Commercial complementary foods explicitly intended for infants under six months of age were found for Kraft Heinz in this assessment, which is against WHO recommendations as these products are considered unwanted breast-milk substitutes since they interfere with exclusive breastfeeding in the first six months. Kraft Heinz is urged to stop producing and selling commercial CF for infants under six months of age in line with global public health recommendations.

- Given the incidences of non-compliant marketing practices for CF products observed, Kraft Heinz is recommended to ensure that CF products are appropriately promoted in line with the 2016 WHO Guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9.

- Kraft Heinz is encouraged to consider the recommendations of the WHA 69.9 supported guidance to appropriately advertise and promote CF products and brands intended for older infants and young children between six months and three years of age on all forms of media platforms globally. The company should also refrain from including endorsements by professionals like nutritionists.

- The World Health Assembly (WHA) 69.9 supported guidance includes recommendations around which messages should be present on CF labels to support optimal infant and young child feeding, and which are inappropriate and could undermine recommended practices. Kraft Heinz should incorporate these recommendations in their policies and practices and apply them to their CF products, as none of the CF products in this assessment fully met these

requirements. The company should aim to address missing statements on exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond while also ensuring that product labels in each market are appropriately translated into local languages. Kraft Heinz is also encouraged to revise its products' labels such that they clearly specify the appropriate age of introduction on all products across all markets.

- Kraft Heinz 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.

- ATNI is calling on Kraft Heinz 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.

CF CORPORATE PROFILE



Corporate Profile
Score

0.5%

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 CF marketing. Kraft Heinz's CF marketing commitments were assessed across nine topics that cover different aspects of the Code, yielding an average score that is equivalent to the company's initial overall

Corporate Profile score before a geographic penalty (if applicable) is applied. However, the assessment on one of the indicators in the first topic on "Guiding Principles of Infant and Young Child Feeding" determines whether a company receives the full initial overall Corporate Profile score or only half of it. A company that is found to market CF for infants under six months of age only gets half of the initial overall Corporate Profile score.

As described in the findings on the topic "Guiding Principles of Infant and Young Child Feeding" below, Kraft Heinz was found to market CF products for infants under six months of age,

therefore its initial overall Corporate Profile score was halved from 10 % to 5%. The final Corporate Profile score considers how the company's marketing commitments are applied across different markets for CF products intended for older infants and young children between six months and up to three years of age (CF 6-36 months). The next section 'Geographic application of CF commitments by product type' shows how the company's application of commitments for CF 6-36 months was evaluated.







The scores and findings on each topic are described in further detail in the section below on 'CF Commitments by Topic'.

Geographic application by Kraft Heinz of CF commitments by product type

The percentage of product sales where commitments are upheld, and the geographic penalty applied to CF products intended for older infants and young children aged six months up to three years. The penalty ranges from 0% up to 90% depending on whether a company fully upholds its CF 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 ^{i 9} | Product type | Percentage of Kraft Heinz's global sales from markets where CF commitments are upheld ^{i 10} | Geographic penalty applied | Final Corporate Profile score |
|---|--|---|----------------------------|-------------------------------|
| 4.9% | Commercial complementary foods 6-36 months ^{i 11} | 0% | 90% | 0.5% |

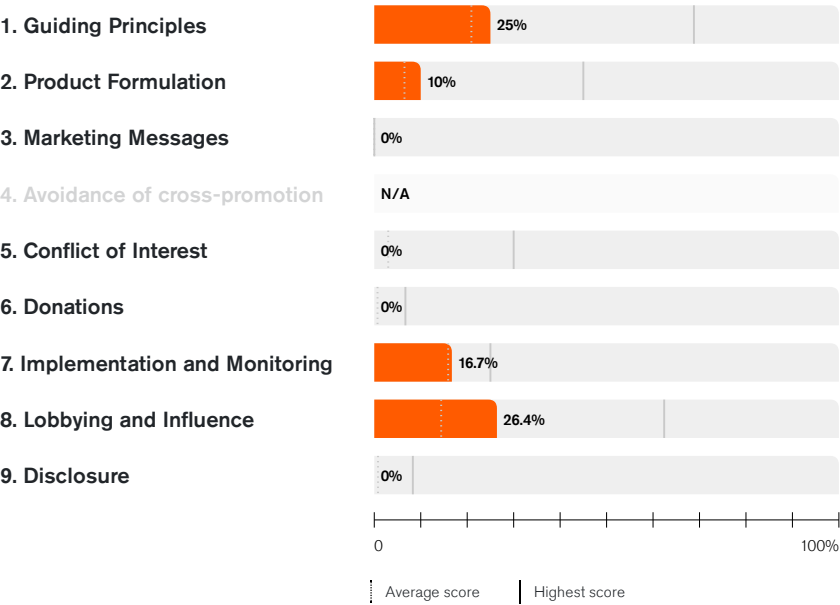
Commitments are upheld

-  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

Commercial Complementary Foods

- No information was found in the public domain nor shared by the company describing if and where (in what markets) marketing commitments are upheld for CF 6-36 products. Therefore, the corresponding geographic penalty is the maximum of 90% and the final Corporate Profile score is 0.5%.
- ATNI calls on Kraft Heinz to consider the expanded definition of the Code, following the WHA resolution 69.9 recommendations that cover and address the responsible marketing of commercially produced complementary foods intended for older infants and young children aged 6–36 months.

Topics Overview



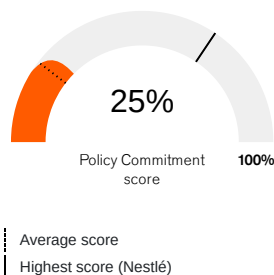
These represent the initial overall scores before applying the penalty.

CF commitments by topic

Most topics include both policy commitments and management systems except for 'Guiding principles of infant and young child feeding' which only considers policy commitments, 'Implementation and Monitoring' which only considers management systems, and 'Disclosure' which only considers the level of disclosure of identified commitments. 'Lobbying and Policy Influence' is the only topic that includes policy commitments, management systems and disclosure.

1. Guiding Principles

This topic consists of policy commitment indicators only.



Policy Commitment

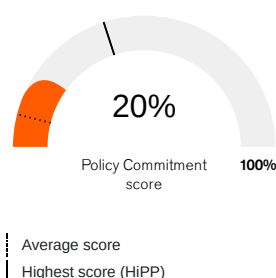
- Kraft Heinz did not show commitments to refrain from marketing complementary foods and drinks for infants younger than six months and such products were found in Indonesia during ATNI's country study assessments. Since the company markets CF products for infants under six months of age, it only gets half of the initial overall Corporate Profile score, as described in the section above. No commitments were found for Kraft Heinz that specifically cover complementary foods for older infants and young children between six months and three years of age.
- Based on Kraft Heinz's 2021 BMS Marketing Charter, the company's overarching commitments to the Code has not changed since the 2021 assessment. The commitments found were not well-aligned with the principles of the Code.
- Even though the company's policy continues to show commitment to comply with some of the principles of the Code, the company still does not fully acknowledge the specifications to the Code provided by the 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. In addition, no explicit commitments were found from Kraft Heinz to follow various WHO and UNICEF guidelines on optimal infant and young child feeding.
- No statement was found on Kraft Heinz's website nor in its internal policies and guidelines explicitly stating the company's support for exclusive breastfeeding in the first six months and continued breastfeeding to two years or beyond, nor its support for the introduction of appropriate complementary foods from the age of six months.
- Since no explicit commitments were found for Kraft Heinz on the marketing of CF in line with the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9, the question on applying

those commitments to the company's joint ventures and subsidiaries does not apply.

- Kraft Heinz is urged to fully state its support for exclusive breastfeeding in the first six months and continued breastfeeding to two years or beyond, adopt WHO guidance relating to complementary feeding and uphold globally recognized public health guidelines, with a key requirement being to no longer produce and sell commercial complementary foods for infants aged under six months.

2. Product Formulation

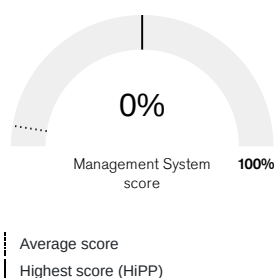
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Policy Commitment

- Similar to the 2021 assessment, Kraft Heinz showed some commitments relating to product formulation. The company's 2022 ESG report showed explicit commitments to manufacture foods for infants and young children according to national standards. In addition, the company states that its products will adhere to Codex standards if national laws are unavailable, however, the Codex standards and guidelines it follows are not explicitly listed.
- Kraft Heinz is encouraged to explicitly state which specific Codex standards and guidelines and other national, regional, and global standards it follows at a minimum for clear reference, and to ensure that the listed standards and guidelines are regularly revised so that the most updated versions are adhered to.
- ATNI did not conduct a CF product profile assessment as part of the CF Marketing Index 2024. Nonetheless, as part of ATNI's action research, recent assessments have been conducted of the nutritional quality and labeling practices of commercial CF using the 2022 WHO Europe nutrient and promotion profile model (NPPM) for foods for infants and young children. A total of 183 CF products by Kraft Heinz were assessed across four countries (Canada, Ireland, Italy, and United Kingdom) and approximately 43% of those products met all nutrient composition requirements of the NPPM. Similar research was also conducted as part of the Consortium for Improving Complementary Foods in Southeast Asia (COMMIT) using a model that was adapted to closely align with the NPPM. Kraft Heinz CF products were found and assessed across five of the seven Southeast Asian countries included in this research: Cambodia, Indonesia, Malaysia, Thailand and Viet Nam.
- For more information about these assessments and the findings, check <https://new-l40rlzsq.accessstonutrition.org/nppm-project-page/>.

Management System

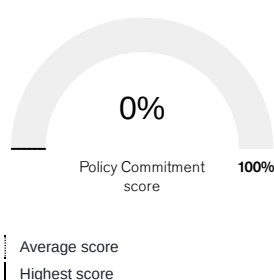


- No relevant procedure manuals were found nor shared by Kraft Heinz demonstrating the implementation of the commitments assessed on this topic. The company therefore does not score in this aspect.

3. Marketing Messages

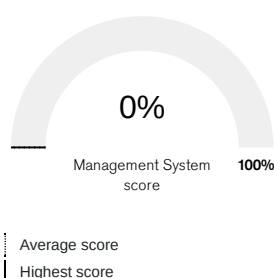
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

Policy Commitment



- Similar to the 2021 assessment, Kraft Heinz did not score on this topic since no explicit commitments were found to ensure that messages on all packaging and marketing/promotional materials of its complementary foods for older infants and young children aged 6-36 months align with the Code requirements of what should and should not be stated as per recommendation 4 of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9. The findings from the country assessments show that Kraft Heinz's messages across all forms of marketing assessed and in two countries (China and Indonesia) did not fully align with the requirements of recommendation 4 of the WHA 69.9 guidance.
- Kraft Heinz is encouraged to adopt these Code requirements in full for all CF marketing materials and clearly outline them in a company policy dedicated to the responsible marketing of complementary foods.

Management System



- No relevant guidance or procedure manuals were found or shared by Kraft Heinz demonstrating the implementation of the commitments assessed on this topic. The company therefore does not score in this aspect.
- To score in this area, Kraft Heinz 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 CF marketing.

4. Avoidance of cross-promotion

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

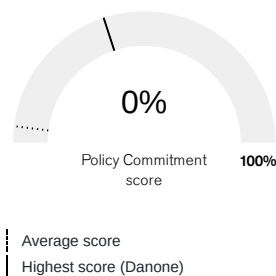
- Kraft Heinz was not assessed on the BMS Marketing Index 2024, therefore, the topic of cross-promotion does not apply to the company.

Management System

- Kraft Heinz was not assessed on the BMS Marketing Index 2024, therefore, the topic of cross-promotion does not apply to the company.

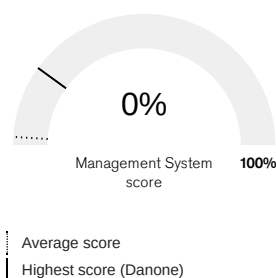
5. Conflict of Interest

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

- Similar to the 2021 assessment, Kraft Heinz did not score on this topic since no explicit commitments were found to avoid conflicts of interest throughout the healthcare system in line with the Code, specifically recommendation 6 of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9.
- To comply with the Code, Kraft Heinz would need to explicitly commit to not using health facilities to host events of any kind and to not giving out gifts or any other offering to caregivers of infants and young children. The company should also commit to not educating caregivers on infant and young child feeding and to only provide scientific and factual information to health workers on the use of complementary foods for older infants and young children aged 6-36 months. Kraft Heinz would also need to refrain from providing contributions to health workers and sponsor meetings of health professionals and scientific meetings.
- Kraft Heinz is encouraged to adopt recommendation 6 of the guidance supported by WHA resolution 69.9, and clearly outline in a company policy dedicated to the responsible marketing of complementary foods how it will avoid conflicts of interest with healthcare workers and in healthcare facilities, in line with these Code requirements.

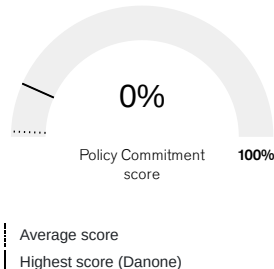


Management System

- No relevant guidance or procedure manuals were found or shared by Kraft Heinz demonstrating the implementation of the commitments assessed on this topic. The company therefore does not score in this aspect.
- To score in this area, Kraft Heinz 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 CF marketing.

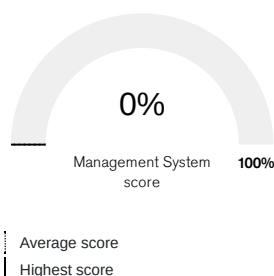
6. Donations

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

- Compared to the last assessment in 2021, commitments on donations of CF are now assessed in a separate topic and across several indicators, to ensure a more accurate assessment of the specific requirements relating to CF donations.
- Kraft Heinz did not score on this topic since no explicit commitments were found to indicate that:
 - the company does not donate nor provide samples of complementary foods for older infants and young children aged 6-36 months to caregivers and children through health workers or health facilities
 - the company does not donate or distribute any equipment, materials (including educational materials), or services to any part of the health care system
 - the company does not donate CF 6-36 products in humanitarian settings, unless officially requested by a competent government authority of the country affected by the emergency or by the designated emergency response coordinating body acting on behalf of the government
 - the company does not use donations of CF 6-36 products to children who require them in social welfare institutions as a sales inducement, nor distributes them for use outside these institutions
- Kraft Heinz is encouraged to clearly outline in a company policy dedicated to the responsible marketing of complementary foods how it will donate complementary foods for older infants and young children aged 6-36 months in various settings, and ensure that it follows recommendation 6 of the guidance supported by WHA resolution 69.9, as well as the requirements outlined in WHA resolutions 47.5 and 63.23 pertaining to donations, and the Operational Guidance for Infant and Young Child Feeding in Emergencies.

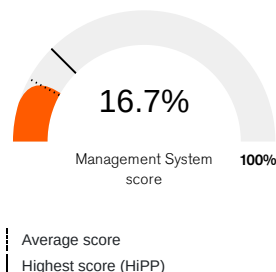


Management System

- No relevant guidance or procedure manuals were found or shared by Kraft Heinz demonstrating the implementation of the commitments assessed on this topic. The company therefore does not score in this aspect.
- To score in this area, Kraft Heinz 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 CF marketing.

7. Implementation and Monitoring

This topic consists of management system indicators only.

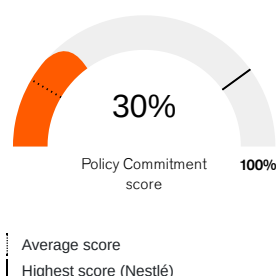


Management System

- Compared to the last assessment in 2021, commitments on implementation and monitoring of CF marketing commitments and practices are now assessed in a separate topic and across several indicators.
- Kraft Heinz was found to not have met most of the requirements assessed in this topic, mainly due to the company's lack of commitments, specifically in relation to the marketing of complementary foods for older infants and young children aged 6-36 months.
- The company however explicitly states within its sustainability report that it follows food safety and quality management systems to certify its products, including CF, such as FSSC22000.
- In addition to developing and having a comprehensive company policy dedicated to the responsible marketing of complementary foods, Kraft Heinz is encouraged to clearly define and effectively communicate to all relevant employees and relevant executives their responsibilities for implementing commitments related to the marketing of CF 6-36.

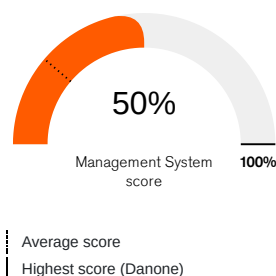
8. Lobbying and Influence

This topic consists of policy commitment indicators, management system indicators, and disclosure indicators. Each set of indicators contributes an equal weight of 33.3% each to the topic score.



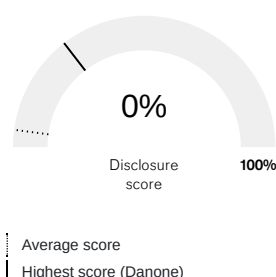
Policy Commitment

- Compared to the last assessment in 2021, commitments relating to the company's engagement with stakeholders on the Code and CF marketing are now assessed in a separate topic and across several indicators.
- Some general commitments were found on Kraft Heinz's website relating to the company's political and lobbying activities. However, the company was not found to explicitly 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, including all subsequent WHA resolutions.
- No explicit statements were found that the company periodically reviews the positions of trade association groups to which it belongs and the extent to which their positions align with the company's own, nor if it places control over all lobbyists to ensure understanding and adherence to its organisational policies.



Management System

- Based on Kraft Heinz's general lobbying commitments, it was found that the company's Board has oversight of lobbying positions and activities and that the company has control mechanisms in place, such as regular reporting to the Board. However, the company does not fully score on management systems as implementation and regular follow-up was not found to be designated to a specific Executive function.

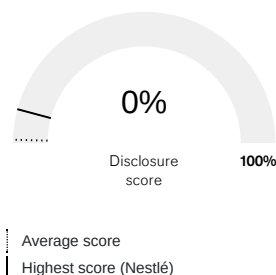


Disclosure

- No information was found on Kraft Heinz's website, neither of its interactions or that of its trade associations in legislative processes related to the Code and CF marketing, nor of links to relevant external platforms that may include this information. Kraft Heinz explained that the company does not engage in lobbying on topics related to complementary feeding given the relatively small size of its CF business. Nevertheless, ATNI encourages the company to follow key public policy frameworks in private sector engagement and lobbying such as the Responsible Lobbying framework, WHO framework of engagement with non-state actors and OECD principles for transparency and integrity in lobbying, among others. .

9. Disclosure

This topic consists of disclosure indicators only.



Disclosure

- Similar to the 2021 assessment Kraft Heinz did not score on this topic, mainly due to the company's lack of commitments specifically in relation to the marketing of complementary foods for older infants and young children aged 6-36 months.
- Kraft Heinz is encouraged to develop and publish a comprehensive company policy dedicated to the responsible marketing of complementary foods and have its commitments available and easily accessible in the public domain.

Footnotes

1. CF refers to commercial complementary foods. These include baby porridge and cereals, dairy/fruit/vegetable-based baby purées, savory meals, and snack foods, as well as baby teas, juices, and water for infants and young children aged 6-36 months. CF products marketed to infants aged under six months are considered unwanted breast-milk substitutes, as these products interfere with exclusive breastfeeding in the first six months. However, ATNI assesses these products in the CF Marketing Index rather than the BMS Marketing Index, to emphasize that CF products are intended for older infants and young children aged 6-36 months and should not be introduced to infants aged under six months who should be exclusively breastfed.
2. Less than 5% of Kraft Heinz'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 Kraft Heinz's CF Marketing Index score.
4. This represents the average score of two country assessments: China and Indonesia.
5. Based on 2021 Euromonitor retail sales estimates.
6. Incidences of non-compliance include non-compliant labels and non-compliant 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. - Commercial complementary food intended for infants under six months of age (CF < 6). - Commercial complementary food intended for older infants and young children between six months and three years of age (CF 6-36 months). - 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 CF brand.
9. This is the company's average score on the 9 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. The Code recommends the introduction of CF products no earlier than six months of age to protect exclusive breastfeeding in this period. Since CF < 6 products should not be available on the market, they were counted as observations of non-compliance and not assessed on any further indicators that evaluate appropriate marketing practices. Therefore, the assessment across the 9 topics solely concerns the responsible marketing of CF 6-36 products.