

Hero

Headquarters
Switzerland

Type of ownership
Public

Estimated percentage of Hero's global F&B sales from CF ¹
49%

Estimated percentage of Hero's global baby food sales from CF ²
83%

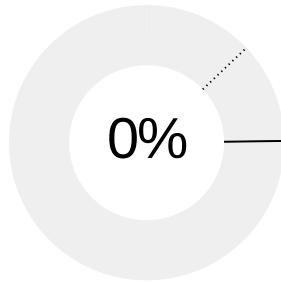
Countries covered in country studies
Germany/US

Company also assessed in:



BMS Index 2024

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CF Marketing Score 2024 ³



Country Studies Score ⁴

0% 2 countries



Corporate Profile Score

0%

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. Hero sells CF products in two (Germany and the US) of the five countries selected for the assessment, which altogether represent almost 30% of Hero's estimated global CF sales. The Country Studies results for Hero are summarized below for each country and across each marketing channel.

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

Country Studies overview

Hero	Country assessments			CF market ⁵	
	Total incidences of non-compliance across online, traditional media, and product labels ⁶	Number of product labels assessed ⁷	Company brands found	CF market share	Proportion of Hero's global CF sales
CHINA	N/A	N/A	N/A	N/A	N/A
GERMANY	22	21	Freche Freude	<5%	<5%
INDONESIA	N/A	N/A	N/A	N/A	N/A
US	30	15	Baby gourmet, Beech-Nut	6%	27%
VIET NAM	N/A	N/A	N/A	N/A	N/A

Code compliance level



- A total of 52 incidences of non-compliant marketing practices for Hero CF were found across online media channels assessed in the two countries and a total of 36 CF product labels were assessed from various Hero CF brands.

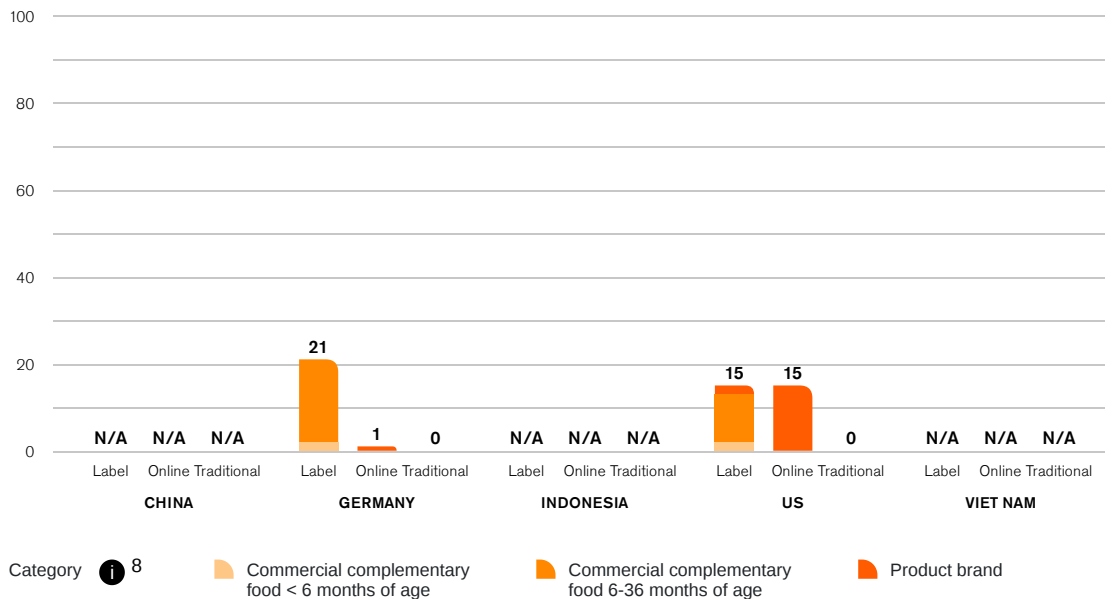
- In Germany, Hero has a relatively small CF market share and it's also a small proportion of Hero's global CF sales (<5%). A total of 22 incidences of non-compliance were identified, mostly from the 21 CF product labels assessed that contained one or more

instances of non-compliance, and one online media advertisement.

- In the US, which represents approximately 27% of the company's global CF sales, and where Hero's shares account for approximately 6% of the CF market, a total of 30 incidences of non-compliance were found, of which 15 were within online media channels. All 15 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

The highest number of incidences of non-compliant marketing practices for Hero were found in the US (30), followed by Germany (22).

Across the two countries assessments, most incidences of non-compliance observed for Hero were for inappropriate product labels (36), followed by 16 incidences of non-compliance identified through the social listening of online platforms. On traditional media or online retail platforms no incidences of non-compliance were found during the period of monitoring local channels.

Of all 52 incidences of non-compliance, four observations related to Hero's CF products for commercial complementary foods 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. In addition, a total of 18 incidences of non-compliance were related to CF products that had no clear age range specified. The remaining 30 observations from CF products 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 (16), all observations were found on the company's local social media platforms. The highest number of findings were in the US (15), followed by only one finding in Germany. No point-of-sale promotions were found on online retailers in the eight-week period the channels were monitored.
- Across Germany and the US, where online adverts of Hero's CF products were found, an average of two and three, respectively, incidences of non-compliance were identified with each observation. All the online 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. Also, in both countries none of Hero's CF

products found promoted online had a clear recommended age of introduction. Other incidences of non-compliance found with the advertisements included giveaways of products in both countries and product samples or soliciting caregivers through contests in the US.

- In the US, 12 out of 15 online CF advertisements contained at least one type of claim, where the most common type identified were marketing claims. From the only advertisement assessed in Germany no claims were found.

Traditional media findings

- There were no observations of Hero's CF products promoted on traditional media in the six-month period the selected channels were monitored.

CF product label

- The number of Hero CF products assessed ranged between 15 in the US up to 21 in Germany. In total four products, two from Germany and two from the US, were found to be marketed as suitable for infants below six months of age. The Code recommends the introduction of CF products no earlier than six months of age to protect exclusive breastfeeding in this period. As those products should not be available on the market, they were counted as non-compliances and not assessed on any further indicators that evaluate appropriate marketing practices. Therefore, the following results are for CF 6-36 months and those with no clear age indicated.

- For all remaining Hero's product labels assessed, at least one incident of Code non-compliance was observed. The average number of incidences of non-compliance per product label per market ranged from two in Germany to three in the US.

- Across the two markets, all of Hero CF labels assessed had at least one type of claim, where the most commonly identified were nutritional claims and

marketing claims. All the CF products assessed for Hero with clear images in Germany and the US, did not include a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. In addition, seven product labels, five from Germany and two from the US were found to include an image, text or other representation that might suggest use for infants under the age of six months.

- 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. Hero did not respond to ATNI during the verification phase, and no images of product labels were provided, as requested by ATNI. Therefore, assessments remained incomplete for one product in the US, and 10 products in Germany. Since at least one incidence of non-compliance was identified from the existing images, these labels were counted as a non-compliant observation.

Recommendations

- The assessment found four commercial complementary foods explicitly intended for infants below six months of age for Hero, 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. Hero 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, Hero is encouraged to consider the gaps identified to improve its CF marketing practices globally such that they fully align with the requirements of the Code. The 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. Hero 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. Examples of aspects that the company can improve across all platforms include restricting the use of all types of claims as defined by WHO Europe's

Nutrient and Promotion Profile Model for all forms of CF marketing. Hero is also encouraged to include statements on exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond.

- From the online assessment, no point-of-sale promotions were found on online retailers in the eight-week period the channels were monitored. From the online media assessment, however, incidences of non-compliance were found. Hero 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. The company should also refrain from including giveaways or product samples to caregivers and online contests.

- ATNI is calling on Hero 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%

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. Hero'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. 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 (this is identified by one of the indicators in the first topic on "Guiding Principles of Infant and Young Child Feeding"). As described in the findings on the topic "Guiding Principles of Infant and Young Child Feeding" below, Hero was found to market CF products for infants under six months of age, therefore its initial overall Corporate Profile score was halved from 0%. 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 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 Hero 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 ⁹	Product type	Percentage of Hero's global sales from markets where CF commitments are upheld ¹⁰	Geographic penalty applied	Final Corporate Profile score
0%	Commercial complementary foods 6-36 months ¹¹	0%	90%	0%

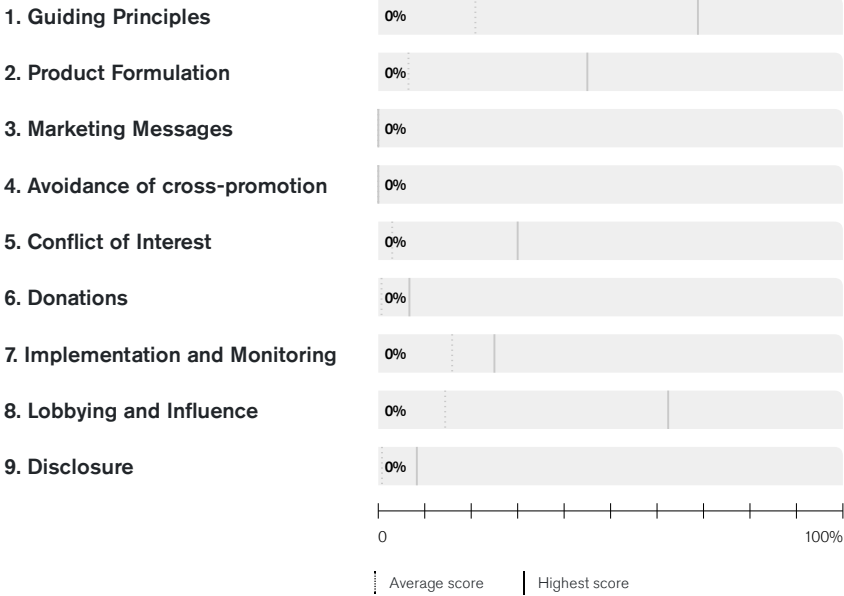
Commitments are upheld

- 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%.
- ATNI calls on Hero 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



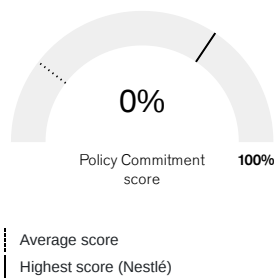
These represent the initial overall scores before applying the penalty.

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.

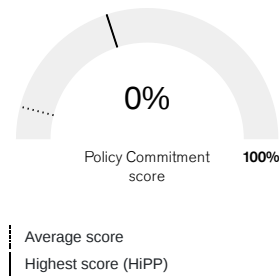


Policy Commitment

- ATNI did not find a policy, nor any other documents published by Hero that cover the marketing of complementary foods and drinks for older infants and young children between six months and three years of age. In addition, the company was not found to commit to not market CF products for infants under six months of age, therefore it only gets half of the initial overall Corporate Profile score, as described in the section above.
- 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.
- In Hero's 2021 Sustainability Report, the company states its support for breastfeeding, without mentioning age ranges. However, no information was found 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. Hero is urged to 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.

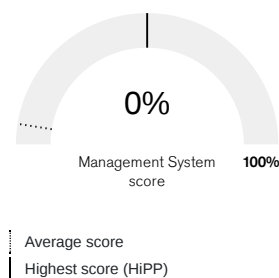
2. Product Formulation

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

- Hero did not score on this topic since no explicit commitments were found nor shared by the company on the formulation of complementary foods for older infants and young children aged 6-36 months. No information was found indicating if the company adheres to any relevant Codex standards and guidelines at a minimum, nor if it follows any national, regional and global standards for composition, safety, quality and nutrient levels.
- Hero is encouraged to explicitly state which specific Codex standards, 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 241 CF products by Hero were assessed across eight countries (Austria, Canada, Egypt, Germany, Ireland, Italy, Saudi Arabia and the UK) and approximately 39% 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. Hero CF products were found and assessed in two of the seven Southeast Asian countries included in this research where it was selling products: Malaysia, and Thailand.
- For more information about these assessments and the findings, check <https://new-l40rlzsq.accessstonutrition.org/nppm-project-page/>.

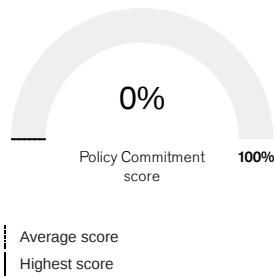


Management System

- ATNI was unable to identify documentation of any management systems the company has in place to implement any policy it may have in relation to CF marketing.
- To score in this area, Hero 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.

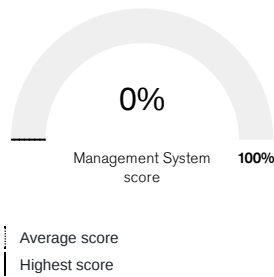
3. Marketing Messages

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

- ATNI found online Hero's Organix Sustainability 2019 report, where the company stated some labeling guidelines followed on packaging, however these did not include the requirements specified in the Code.
- Hero 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 Hero's messages across all forms of marketing assessed did not fully align with the requirements of recommendation 4 of the WHA 69.9 guidance.
- Hero 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.

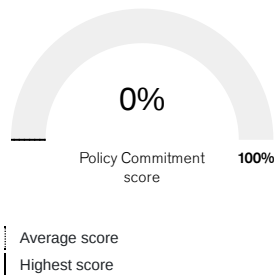


Management System

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



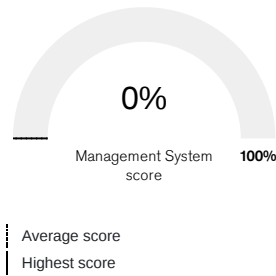
Policy Commitment

- Hero did not score on this topic since no explicit commitments were found indicating that the company takes various measures to avoid promoting its breast-milk substitutes indirectly via the promotion of its complementary foods for older infants and young children aged 6-36 months, also known as cross-promotion.
- Hero is encouraged to adopt the Code requirements set out in recommendation 5 of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9 that address cross-promotion. The company is urged to clearly outline in a company policy dedicated to the responsible marketing of complementary foods how it will differentiate the packaging and other materials used in the marketing of CF from that used in the marketing of its BMS products, as well as commit to avoiding establishing contact with

caregivers, including through baby clubs and social media groups and other platforms of communication.

Management System

- ATNI was unable to identify documentation of relevant commitments and relevant management systems, therefore the company did not score in this aspect.
- To score in this area, Hero 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.

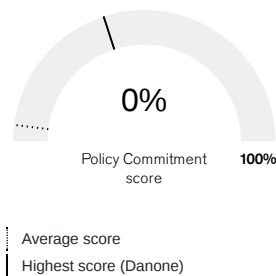


5. Conflict of Interest

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.

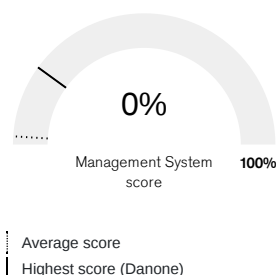
Policy Commitment

- Hero 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, Hero 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. Hero would also need to refrain from providing contributions to health workers and sponsor meetings of health professionals and scientific meetings.
- Hero 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.



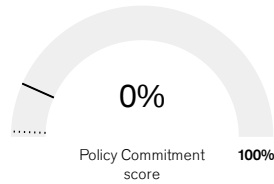
Management System

- ATNI was unable to identify documentation of relevant commitments and no relevant management systems were identified either, therefore the company did not score in this aspect. To score in this area, Hero 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.



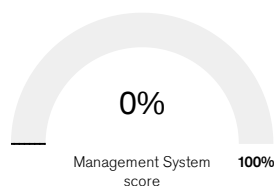
Average score
Highest score (Danone)

Policy Commitment

- On Hero's Annual (2021, 2022) and Sustainability (2021) reports, ATNI identified mention of donations of Hero's CF products to food banks, however, it was unclear whether the donations are used as sales inducement or distributed for use outside these institutions. The evidence was not adequate to substantiate the assessment.
- Hero 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
- Hero 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

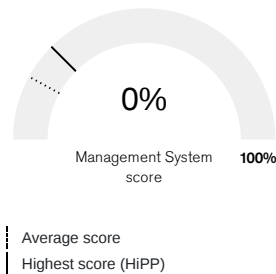
- ATNI was unable to identify relevant commitments, and no relevant management systems were identified either, therefore the company did not score in this aspect.
- To score in this area, Hero would need to develop comprehensive management systems, procedures, and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible CF marketing.



Average score
Highest score

7. Implementation and Monitoring

This topic consists of management system indicators only.

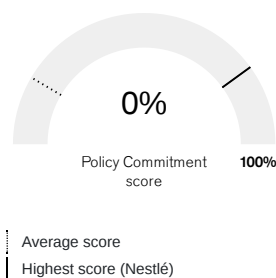


Management System

- Hero 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.
- In Hero's 2021 annual report the company states that it has controls and processes in place to ensure high quality products, however none of the relevant food safety and quality certifications assessed were found explicitly listed, such as ISO 9001, FSSC22000, HACCP, BRC, and IFS.
- ATNI was unable to identify relevant commitments, and no relevant management systems were identified either, therefore the company did not score in this aspect.
- To score in this area, in addition to developing and having a comprehensive company policy dedicated to the responsible marketing of complementary foods, Hero 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

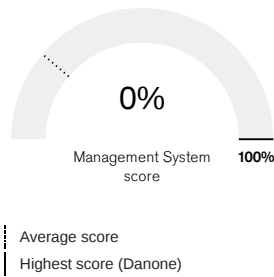
This topic consists of policy commitment indicators, management system indicators, and disclosure indicators. Each set of indicators contributes an equal weight of 33.3% each to the topic score.



Policy Commitment

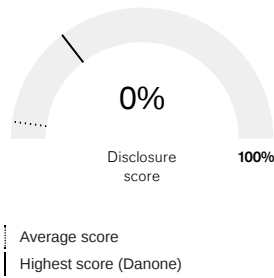
- ATNI did not find any publicly available information regarding any commitments or objectives the company has in relation to engagement with policymakers on CF marketing. The company therefore did not score on this topic.
- To score in this area, Hero is encouraged to develop a policy setting out under what circumstances and how it will lobby and engage with governments and policymakers on issues relating to CF 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 review the positions of all trade associations and industry policy groups it belongs to and assess the extent to which they align with the company's own policy positions.

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 CF marketing.
- To score in this area, Hero would need to clearly assign executive responsibilities and oversight to ensure the effective implementation of its policy on engaging with stakeholders on CF marketing and the Code, as well as develop clear systems and control mechanisms such as reporting and internal audits.

Disclosure

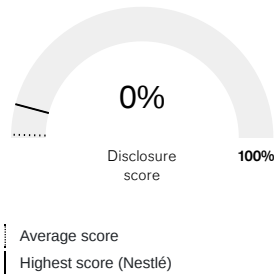


- No information was found on Hero's website neither of its interactions, or that of its trade associations, in legislative processes related to the Code and CF marketing, nor of links to relevant external platforms that may include this information. ATNI encourages the company to follow key public policy 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



- Hero 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
- In addition to developing and having a comprehensive company policy dedicated to the responsible marketing of complementary foods, Hero is encouraged to 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. 17% of Hero'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 Hero's CF Marketing Index score.
4. This represents the average score of two country assessments: Germany and the US.
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.