

# HiPP

Headquarters  
Germany

Type of ownership  
Private

Estimated percentage of HiPP's global  
F&B sales from CF <sup>1</sup> 71%

Estimated percentage of HiPP's global  
baby food sales from CF <sup>2</sup> 72%

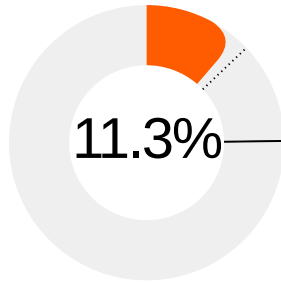
Countries covered in country studies  
China/Germany/Viet Nam

Company also assessed in:



BMS Index 2024

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CF Marketing  
Score 2024 <sup>3</sup>

Average score  
Highest score



Country Studies  
Score <sup>4</sup>

22% 3 countries



Corporate Profile  
Score

0.7%

**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

22% 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. HiPP sells CF products in three (China, Germany and Viet Nam) of the five countries selected for the assessment which altogether represent almost 52% of HiPP's estimated global CF sales. The Country Studies results for HiPP are summarized below for each country and across each marketing channel.

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

# Country Studies overview

HiPP	Country assessments			CF market <sup>5</sup>	
	Total incidences of non-compliance across online, traditional media, and product labels <sup>6</sup>	Number of product labels assessed <sup>7</sup>	Company brands found	CF market share	Proportion of HiPP's global CF sales
CHINA	28	2	HiPP	<5%	8%
GERMANY	55	37	HiPP	44%	40%
INDONESIA	N/A	N/A	N/A	N/A	N/A
US	N/A	N/A	N/A	N/A	N/A
VIET NAM	7	3	HiPP	10%	4%

## 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 90 incidences of non-compliant marketing practices for CF products were found for HiPP CF across the three markets, including 42 product labels of HiPP CF brand, and promotions found on online and traditional media.

- In China, where HiPP's CF sales represent 8% of the company's global CF sales and it has a relatively small share in the Chinese CF market (<5%), a total of 28 incidences of non-compliance were identified which included 26 non-compliant advertisements or promotions on online media channels and both product labels assessed contained one or more instances of non-compliance.

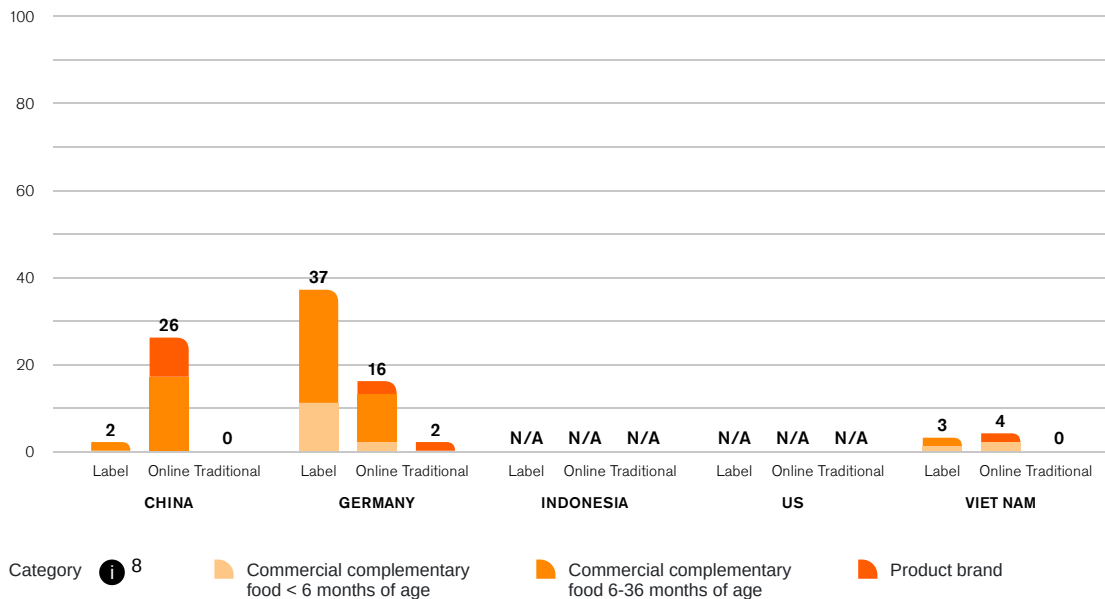
- The highest number of incidences of non-compliance were found in Germany (55), where HiPP has a high

share of the German CF market (~44%) and which represents approximately 40% of the company's total global CF sales. Of these observations, a total of 16 non-compliant advertisements and promotions related to CF brands were found online during the research period, and all 37 product labels assessed contained one or more instances of non-compliance.

- A significantly lower number of incidences of non-compliance (7) were found for HiPP in the Viet Nam, which is not a major market for the company, while the company possesses a reasonable share of the Vietnamese CF market (~10%): four non-compliant advertisements and promotions related to CF brands were found online during the research period, and all three product labels assessed contained one of 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 HiPP were found in Germany (55), followed by China (28), and Viet Nam (7).

Across all country assessments, the majority of incidences of non-compliance observed (46) for HiPP were identified through the social listening of online platforms. A high incidence of non-compliance was also identified in product labels (42). On traditional media, only two incidences of non-compliance were found in Germany.

In addition, 16 commercial complementary foods explicitly intended for infants below six months of age were found for HiPP in this assessment, the majority were found in Germany (13) and the other three in Viet Nam. Sixteen products had no clear age range or included a brand promotion, and the other commercial complementary foods found (58) during ATNI's assessment were clearly marketed as suitable for older infants and young children between six months up to three years of age.

### Online findings

- Among the total incidences of non-compliance found online (46), only six were non-compliant point-of-sale promotions found on online retailer channels in China. All these point-of-sale promotions contained one or several claims (nutritional, health and/ or marketing claims) and none included 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. Despite ATNI's request for HiPP to verify any contractual relationship with the retailers monitored, confirmation could not be obtained from the company. There were no observations of CF identified among the online retailer channels monitored in the other markets assessed.

- The remaining 40 non-compliant observations were found on the company's local social media platforms, with the highest number of findings in the China (20,

on Weibo), followed by Germany (16 on Facebook and Instagram) and Viet Nam (four on Facebook).

- In total four products (two in Germany and two in Viet Nam) were found to be marketed online as suitable for infants under 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 showing a brand related to the product.

- Across the three countries where online adverts of HiPP's CF products were found, an average of two to three incidences of non-compliance were identified

with each observation. All the adverts found online across the three countries 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. In China and Viet Nam, around half of HiPP's CF products found promoted online had a clear recommended age of introduction whereas in Germany, the recommended age was clearly indicated for almost all advertisements.

- Other incidences of non-compliance found with the advertisements in China, included an image, text, or other representation that may suggest that the product is inherently superior to home-prepared foods (seven out of 20). Another incidence of non-compliance found in the Germany was a text that may discourage or undermine breastfeeding, in this case, the message indicated a recommendation to breastfeed or use HiPP formula until four months.

- The majority of the online advertisements found also included claims, and the most common type was nutritional claim in China, and for Germany and Viet Nam, marketing claims.

#### Traditional media findings

- In total, two advertisements of HiPP CF brand were found on television during the six-month monitoring period of selected channels across all three countries. Both advertisements were found during the monitoring in Germany, and both had an average of three incidences of non-compliance with the Code. The two TV advertisements had claims (health, nutritional and marketing claims) and there was no clear recommended age of introducing the CF products, nor 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.

#### CF product label

- A total of 42 of HiPP's CF product labels were assessed across the three markets, 37 of which were in Germany.

- In total 12 product labels (11 in Germany and one in Viet Nam) were found to be marketed as suitable for infants under six months of age. As those products

should not be available on the market as per WHO recommendations, 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 showing a brand related to the product.

- For all HiPP product labels assessed, at least two incidents of Code non-compliance were observed. The average number of incidences of non-compliance per product label per market ranged from two in China and Germany to three in Viet Nam.

- Across the three markets, all HiPP's CF labels assessed had at least one type of claim. All the CF products assessed for HiPP, 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. Other incidences of non-compliance were found on product labels from Germany and Viet Nam as some products (six in Germany and two in Viet Nam) included an image, text, or other representation that may suggest that the product is inherently superior to home-prepared foods. Both products in Viet Nam did not have all labeling in the appropriate language used locally, 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.

- 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 provided 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. While HiPP directed ATNI to specific sections on its German website where product label images could be found, the company did not provide additional images of products sold in China. Therefore, a small number of products were assessed in China compared to the other two countries.

## Recommendations

- Commercial complementary foods explicitly intended for infants below six months of age were found for HiPP in Germany and Viet Nam 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. HiPP 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, HiPP 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. HiPP should incorporate these recommendations in its policies and practices and apply them to its 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. HiPP 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.

- A key issue was found across the three countries where 16 of the observations (all advertisements and

most labels) were of CF products that had no clear recommended age of introduction specified. The company should be transparent and include the age indication in advertisements and labeling.

- HiPP 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, especially in China and Germany where more incidences were found.

- ATNI is calling on HiPP 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

0.7%

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. HiPP'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, HiPP was found to market CF products for infants under six months of age, therefore its initial overall Corporate Profile score was halved from 13% to 7%. 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 HiPP 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 <sup>9</sup>	Product type	Percentage of HiPP's global sales from markets where CF commitments are upheld <sup>10</sup>	Geographic penalty applied	Final Corporate Profile score
6.5%	Commercial complementary foods 6-36 months <sup>11</sup>	0%	90%	0.7%

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

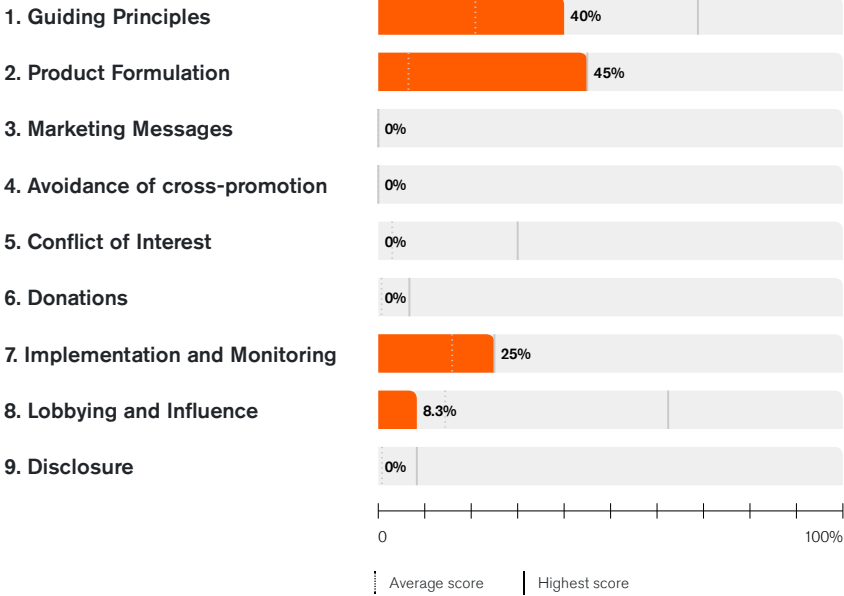
### Commercial Complementary Foods

- 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 0.6%.

- ATNI calls on HiPP to consider the expanded definition of the Code, following the World Health Assembly 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



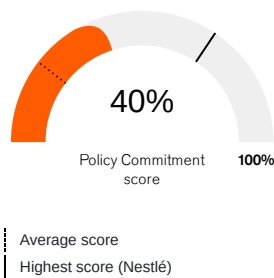
These represent the initial overall scores before applying the penalty.

# 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.



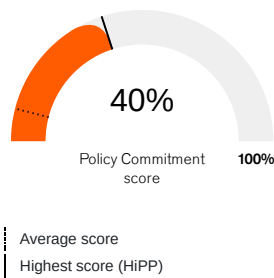
### Policy Commitment

- HiPP did not show commitments to refrain from marketing complementary foods and drinks for infants younger than six months and such products were found in Germany and Viet Nam 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 HiPP that specifically cover complementary foods for older infants and young children between six months and three years of age.
- Based on HiPP's internal guidelines for marketing breast-milk substitutes – shared under NDA – the company was found to support exclusive breastfeeding in the first six months and continued breastfeeding for two years or beyond, as well as the introduction of appropriate complementary foods from the age of six months.
- However, no clear evidence was found or shared by the company showing that HiPP acknowledges 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. In addition, no explicit commitments were found from HiPP to follow various WHO and UNICEF guidelines on optimal infant and young child feeding.
- Since no explicit commitments were found for HiPP 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.
- HiPP 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.

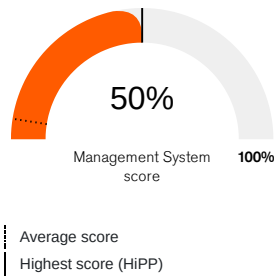
## 2. Product Formulation

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

- Compared to the other companies, HiPP had the most commitments in this topic. The company shared some internal product formulation guidelines and standards under NDA, showing explicit commitments to formulating complementary foods according to the Codex standard for processed cereal-based foods for infants and young children (Codex/STAN 074-1981, revised in 2006) and Codex advisory list of vitamin components for use in foods for infants and children (CAC/GL 10-1979, revised in 2009). However, no information was found indicating if the company adheres to other 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.
- HiPP is encouraged to explicitly state which other 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 392 CF products by HiPP were assessed across six countries (Austria, Germany, Ireland, Italy, Saudi Arabia and the UK) and approximately 34% 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. HiPP CF products were found and assessed in Viet Nam.
- For more information about these assessments and the findings, check <https://new-l40rlzsq.accessstonutrition.org/nppm-project-page/>.

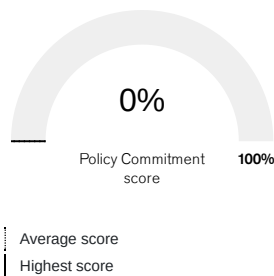


#### Management System

- HiPP confidentially shared one procedure manual developed by the company for cereal-based foods which describes the product development processes, demonstrating procedures to implement the assessed Codex standards. The procedures were clear however the company did not fully score on this topic as it was not found to commit to and implement all the guidelines assessed in this topic.
- To score in this area, HiPP 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

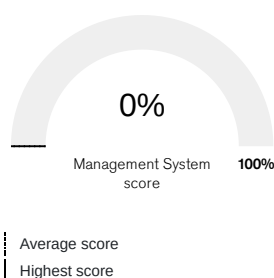
**This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.**



#### Policy Commitment

- HiPP shared under NDA its internal guidelines for label development, as well as an example of a label of one of its CF products as evidence of the company's commitments regarding information that would be present in all packaging and promotional materials of its complementary foods. The company also informed ATNI that the prohibited information on CF product labels assessed in this section is not present in any packaging and promotional materials of its complementary foods. However, the company did not provide evidence to substantiate the assessment as requested and ATNI could not identify any relevant information in the public domain.
- HiPP 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 HiPP's messages across all forms of marketing assessed did not fully align with the requirements of recommendation 4 of the WHA 69.9 guidance.
- HiPP 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

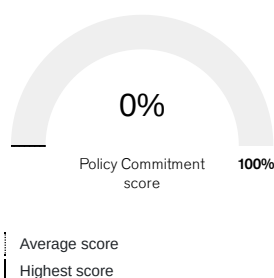


- Based on the internal labeling guidelines confidentially shared by HiPP, no relevant instructions nor procedures were found for implementing commitments relating to CF marketing messages. Since no relevant commitments were found, and no relevant management systems were identified either, the company did not score in this aspect.
- To score in this area, HiPP 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

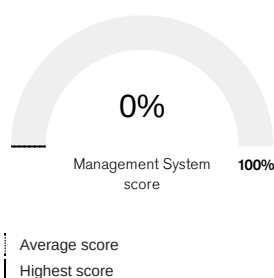
**This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.**

#### Policy Commitment



- During the engagement, HiPP declared that the packaging design, labels and promotional materials for its CF products are different from the ones used for its BMS products, however, the company did not provide any evidence to substantiate the assessment as requested. The information provided by the company was not found in any official internal or public documentation. Therefore, HiPP 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.
- HiPP 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.

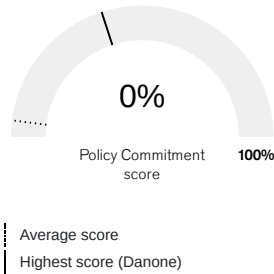
#### Management System



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

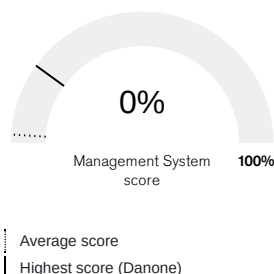
## 5. Conflict of Interest

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

- HiPP informed ATNI that all information provided to health workers regarding CF and their usage is scientific and factual. However, the company did not provide evidence to substantiate the assessment as requested. The information provided by the company was not found in any official internal or public documentation.
- HiPP 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, HiPP 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. HiPP would also need to refrain from providing contributions to health workers and sponsor meetings of health professionals and scientific meetings.
- HiPP 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.

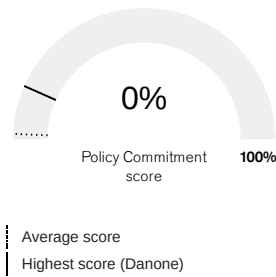


### Management System

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

- During engagement, HiPP stated that the company only donates CF to officials or charitable organisations upon request and these are not used as sales inducements. However, the company did not provide evidence to substantiate the assessment as requested. The information provided by the company was not found in any official internal or public documentation.

- HiPP 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 healthcare 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.

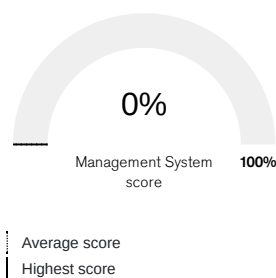
- the company does not use donations of CF 6-36 products to children who require them in social welfare institutions as a sales inducement, nor distributes them for use outside these institutions.

Although HiPP has policies that cover some of these requirements in regard to donations of its BMS products, HiPP's commitments on donations of its CF 6-36 products are unclear.

- HiPP 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 HiPP is also encouraged to 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

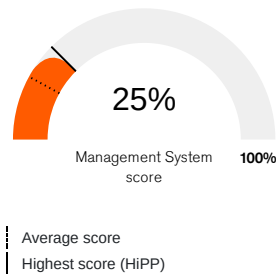
- No relevant guidance or procedure manuals were found or shared by HiPP demonstrating the implementation of the commitments assessed on this topic. The company therefore does not score in this aspect.
- To score in this area, HiPP would need to develop comprehensive management systems, procedures and 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.

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### Management System

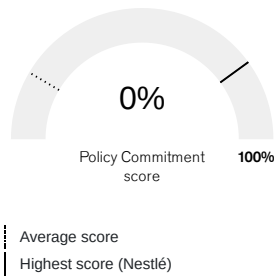
- During the engagement, HiPP indicated which internal function has responsibility for the implementation of its commitments and that all national business units and third parties should abide by the HiPP Managing Guidelines. However, the company did not provide evidence to substantiate the assessment as requested and did not clarify if these guidelines apply to the marketing of complementary foods. The information provided by the company was not found in any official internal or public documentation.
- Limited documentation was found and shared by HiPP demonstrating any management systems the company has in place to implement any policy it may have in relation to CF marketing. The company therefore does not fully score in this aspect, except for partly in the indicator assessing communication of CF marketing commitments to the company's employees. HiPP shared confidentially guidelines and trainings provided to its employees to implement some of the company's commitments related to CF marketing. However, these documents appear to only apply to some markets.
- In addition, like most companies assessed in the CF Marketing Index, the company was found to follow globally recognized food safety and quality standards to certify its CF products, such as BRC and HACCP, which was clearly evidenced in HiPP's 2020 sustainability report.
- To fully score in this area, HiPP would need to develop clear guidance for its employees and contractual third parties on the responsible marketing of CF as outlined in the company's related policy(ies). The company should also have effective systems in place to monitor responsible CF marketing practices. It should also clearly assign executive responsibilities and oversight to ensure the effective implementation of its CF marketing policy.

## 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.

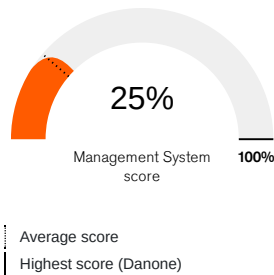
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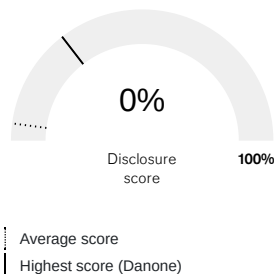
### Policy Commitment

- HiPP informed ATNI that it represents its interests on CF issues through relevant sector organizations and follows their transparency rules. However, no evidence was shared or found in the public domain reflecting universal company commitments explaining under which circumstances and how the company will lobby and engage with governments and policymakers on CF issues and the Code.
- HiPP also confidentially shared an internal document as evidence to the assessment of this topic, however no relevant information was found in this document nor in the public domain of the commitments assessed in this topic.
- To score in this area, HiPP 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 and the Code. Therefore, the company did not score on this topic, except for partially as it provided sufficient evidence that the Board has oversight of lobbying positions and activities.
- To score in this area, HiPP 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.



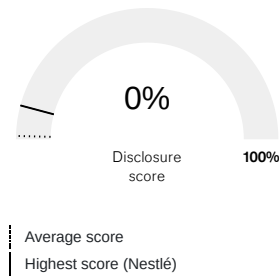
### Disclosure

- No information was found on HiPP'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, amongst others.

## 9. Disclosure

This topic consists of disclosure indicators only.

## Disclosure



- During the engagement, HiPP stated that the company encourages the use of suitable, nutrient-rich, home-prepared foods by providing nutrient-rich components that can be used as such for home preparation of complementary foods like oils, meat preparations, cereal paps or fruit puree. However, the statement shared by the company was not found in any official public documentation and the company did not share nor clarify if it publicly commits to WHO and UNICEF guidelines on optimal infant and young child feeding.
- HiPP 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. HiPP did not clarify if these guidelines apply to the marketing of complementary foods.
- In addition to developing and having a comprehensive company policy dedicated to the responsible marketing of complementary foods, HiPP 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. 28% of HiPP'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 Danone's CF Marketing Index score.
4. This represents the average score of three country assessments: China, Germany and Viet Nam.
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.