

# HiPP

Headquarters  
Germany

Type of ownership  
Private

Estimated percentage of HiPP's global  
F&B sales from BMS ①<sup>1</sup>  
28%

Estimated percentage of HiPP's global  
baby food sales from BMS ①<sup>2</sup>  
28%

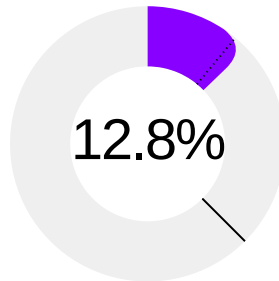
Countries covered in country studies  
China/Germany/Viet Nam

Company also assessed in:



CF Index 2024

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BMS Marketing  
Score 2024 ①<sup>3</sup>

..... Average score  
| Highest score



Country Studies  
Score ①<sup>4</sup>

22% 3 countries



Corporate Profile  
Score

3.7%

## 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.

# BMS 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 BMS products in three (China, Germany and Viet Nam) of the five countries selected for the assessment which altogether represent over 25% of HiPP's estimated global BMS sales. The Country Studies results for HiPP 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

HiPP	Country assessments			BMS market <sup>1 5</sup>	
	Total incidences of non-compliance across online, traditional media, and product labels <sup>1 6</sup>	Number of product labels assessed <sup>1 7</sup>	Company brands found	BMS market share	Proportion of HiPP's global BMS sales
CHINA	23	0	Not applicable	<5%	No information
GERMANY	36	24	HiPP	17%	25%
INDONESIA	N/A	N/A	N/A	N/A	N/A
US	N/A	N/A	N/A	N/A	N/A
VIET NAM	6	6	HiPP	<5%	No information

## Code compliance level



- A total of 65 incidences of non-compliant marketing practices for CF products were found for HiPP. Non-compliant marketing practices were found across online media channels and traditional media assessed in the three countries and a total of 30 CF product labels were assessed from the HiPP brand.

- Among the three countries where HiPP's marketing practices were assessed, the company has relatively high shares in Germany (17%) which is a market that constitutes almost 25% of HiPP's global BMS sales. It is also the market in which the highest number of incidences of non-compliance (36) were found for the company, and the largest number of product labels

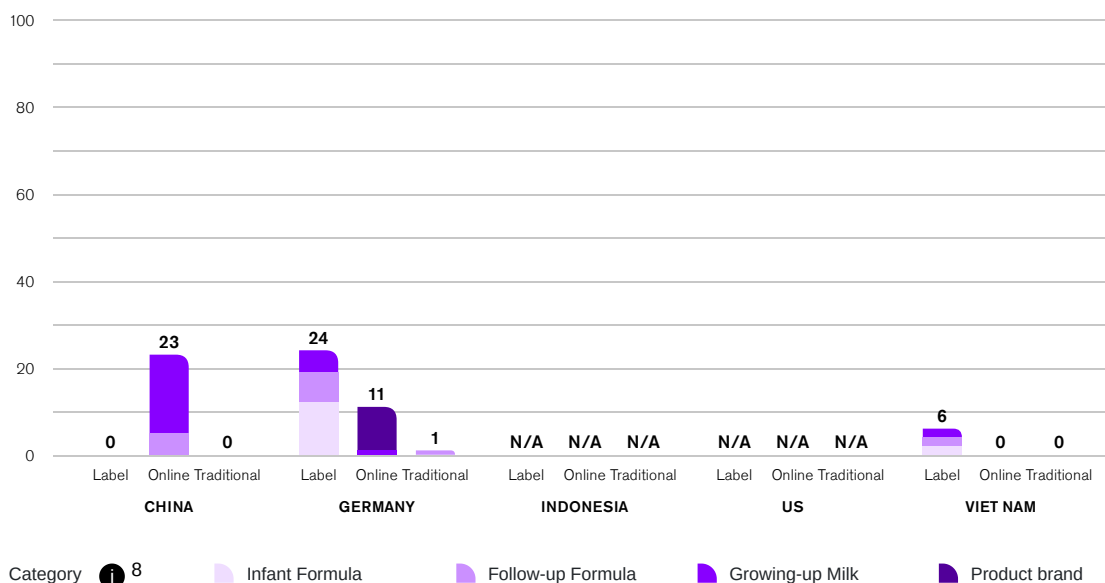
were assessed (24).

- In China and Viet Nam, the company has relatively low shares in these countries' BMS markets. The number of identified incidences of non-compliance (6) was lowest in Viet Nam for HiPP across the three countries it was assessed in, where only six product labels were assessed.

- In China, although no product labels were found during data collection nor shared by the company for assessment, a total of 23 incidences of non-compliance were identified across the monitored media channels.

# 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-compliance for HiPP's were found in Germany (36), followed by China (23), and Viet Nam (6).

Overall, the majority of incidences of non-compliance (34 out of 65) for HiPP were identified through the social listening of online platforms. Many incidences of non-compliance were also attributed to inappropriate product labels (30 out of 65) and only one incidence of non-compliance was found on traditional media in Germany.

In Germany, most incidences of non-compliance were found on infant formula labels intended for infants from birth, whereas in China they were largely concerning growing-up milks promoted online.

### Online findings

- Among the total incidences of non-compliance found online, over half were point-of-sale promotions found on online retailers, mainly in the form of discounts and special offers. There were no observations of HiPP BMS products among the online retailers monitored in Viet Nam. In total, 18 point-of-sale promotions were found in China of follow-up formula and growing-up milk, and only one promotion of a HiPP growing-up milk was identified on the online retailer websites monitored in Germany, all of which are contraventions of the Code.
- The remaining 15 observations were found on the company's local websites and social media platforms, with the highest number of findings in Germany (10) and five found in China. No online advertisements for HiPP BMS products and brands were identified in Viet Nam during the eight-week period the channels were monitored.
- In China and Germany, an average of two incidences

of non-compliance were identified with each observation.

- Apart from advertising BMS – a non-compliance with the Code in itself – other common incidences found with those advertisements included the promotion of bottle feeding in China and soliciting caregivers in Germany to sign-up to baby clubs that provide education on infant and young child feeding.
- The majority of advertisements also included claims, ranging from 50% of the identified advertisements in Germany containing at least one type of claim, mostly nutritional claims, to 80% in China which were mostly marketing claims.

### Traditional media findings

- One advertisement of a HiPP follow-up formula was identified on television in Germany during the six-month period the selected channels were monitored, which also included a nutrition and marketing claim.

#### BMS product label

- Of all products, 24 HiPP BMS products were assessed in Germany and six in Viet Nam. No BMS products were found in China for HiPP during data collection nor shared by the company for assessment.
- For all HiPP product labels assessed, at least one incident of Code non-compliance was observed. The average number of incidences of non-compliance per product label ranged from five in Germany to seven in Viet Nam.
- All six HiPP labels assessed in Viet Nam had health and nutrition claims, and 22 of the 24 labels assessed in Germany for HiPP had at least one type of claim, the most commonly found being marketing claims. None of the 30 labels assessed for HiPP included a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to 2 years or beyond.
- In Germany, the products assessed for HiPP were found to generally meet the requirements of the Code regarding clear instructions on the appropriate preparation of powdered formula. However, most of the products (20 out of the 24) did not have clear

instructions indicating the use of hygienic practices, including clean hands and surfaces, when preparing powdered formula. In addition, half of HiPP's products assessed in Germany were missing a statement that the product should be used only on the advice of a health worker, in a font size that is easily visible, in bold and on a contrasting background, and only half included the recommended age range near the product name.

- It is worth noting that ATNI did not have the resources to collect products from the different markets and take pictures of their labels. In this iteration, ATNI's research was based on product label images from an external provider. For some products, images were not clear enough or did not show all parts of the package, thus ATNI asked the respective companies to provide images of the labels. While HiPP directed ATNI to specific sections on its German website where product label images could be found, the company did not provide images for the products sold in China and Viet Nam. Incomplete assessments therefore remained for three products in Viet Nam. Since at least one incidence of non-compliance was identified from the existing images, these labels were counted as a non-compliant observation.

## Recommendations

- With a total of 65 incidences of non-compliant marketing practices for BMS products found for HiPP across online and traditional media channels as well as product labels assessed in the three countries, HiPP is strongly encouraged to strengthen its marketing policies and ensure its marketing practices comply fully with the recommendations of the Code and all subsequent relevant resolutions, including the guidance supported by WHA resolution 69.9. ATNI has developed a model company policy on the responsible marketing of breast-milk substitutes which can guide companies on how to incorporate Code provisions and align with the latest public health requirements in practice.
- HiPP is urged to restrict the advertising and promotion of all types of BMS products and brands on all forms of media platforms globally. The company should also refrain from soliciting contact with caregivers and providing education and information on infant and young child feeding across all platforms.
- 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 as well as traditional media channels.

- HiPP is encouraged to look for ways to engage with its industry associations, retailers and/or regulators to ensure that there are no promotions of BMS products in the retail environment, and see that products are appropriately marketed in line with the Code.
- Given that all the labels assessed were found to be non-compliant with the Code requirements, HiPP is encouraged to focus on improving labeling practices across all markets to ensure full compliance with the Code and all subsequent relevant resolutions, including the guidance supported by WHA resolution 69.9.
- From our research, point-of-sale promotions from HiPP for growing-up milks were found, and observations on online platforms were also mainly for growing-up milk and brands associated with BMS product advertisements, which is contrary to the requirements of the Code, specifically the guidance supported by WHA resolution 69.9 that extends the scope of the Code to growing-up milks. Therefore, ATNI urges HiPP to ensure its commitments include growing-up milks in all markets.
- 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.

# BMS CORPORATE PROFILE



Corporate Profile  
Score

3.7%

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 BMS marketing. HiPP's BMS marketing commitments were assessed across 11 topics that cover different aspects of the Code on which the company scored an average of 8%. This score is equivalent to the company's initial overall Corporate Profile score before a geographic penalty (if applicable) is applied to each BMS product type. The final Corporate Profile score considers how the company's BMS marketing commitments are applied for the different BMS product types sold by the company, and across different markets. As HiPP sells infant formula, follow-up formula, and growing-up milks, the company's application of BMS commitments was evaluated for each product type, as shown in the next section on 'Geographic application of BMS commitments by product type'. The scores and findings on each topic are described in further detail in the section below on 'BMS Commitments by Topic'.







<https://new-l40rlzsq.accesstonutrition.org/app/uploads/2024/03/Geographic-penalty.pdf>

## Geographic application by HiPP of BMS commitments by product type

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

Corporate Profile score before penalty <sup>9</sup>	Product type	Percentage of HiPP's global sales from markets where BMS commitments are upheld <sup>10</sup>	Geographic penalty applied	Final Corporate Profile score
7.5%	Infant formula <sup>11</sup>	95%	4.5%	3.7%
	Follow-up formula <sup>12</sup>	0%	90%	
	Growing-up milk <sup>13</sup>	0%	90%	

Commitments are upheld

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

ATNI referred to HiPP's 2018 Guideline for marketing breast-milk substitutes and other internal documentation that was confidentially shared with ATNI to assess how the company's BMS marketing commitments are upheld for each product type and in which markets. Euromonitor retail sales estimates were used to calculate the proportion of HiPP's global product sales covered per BMS product type.

### Infant formula

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

However, HiPP did not share evidence to confirm that these commitments are also upheld for infant formulas for special medical purposes. Although commitments for infant formula products are upheld globally, it is not clear if they are upheld for infant formula for special medical purposes too; and this represents 95% of the company's global infant formula sales.

The corresponding geographic penalty for this product type is 4%.

ATNI encourages HiPP to provide clear evidence that it covers all infant formula, without exception, including formulas for special medical purposes.

### Follow-up formula

The company does not apply its BMS marketing commitments to follow-up formula.

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

To further improve the scope of the company's policy, ATNI urges HiPP to cover the marketing of its follow-up formula globally.

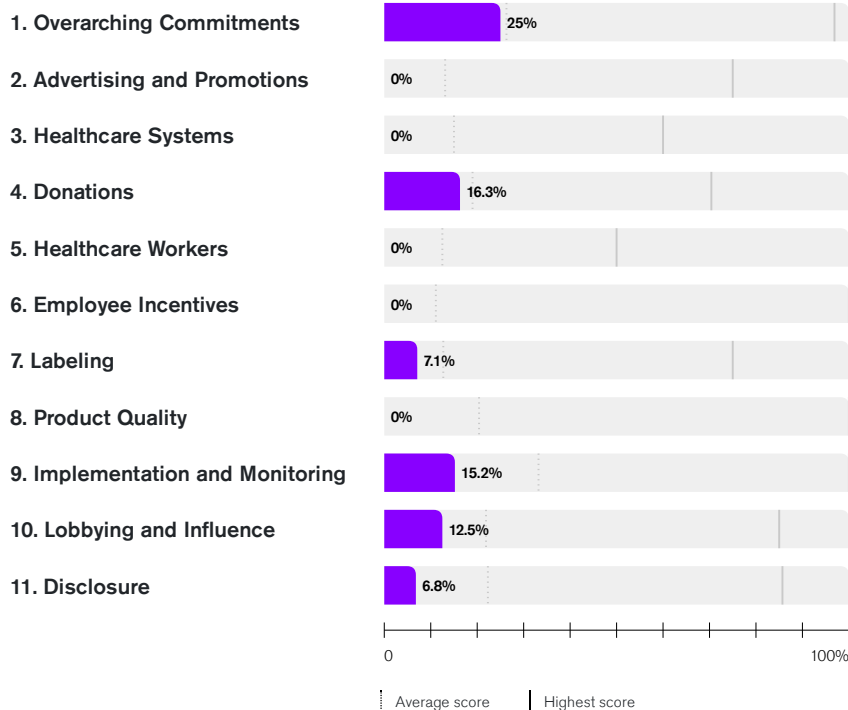
### Growing-up milk

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

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

ATNI calls on HiPP to consider the expanded definition of the Code, following the World Health Assembly resolution 69.9 recommendations, to cover any milk products up to three years of age.

## Topics Overview



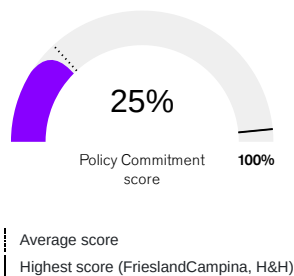
These represent the initial overall scores before applying the penalty.

# BMS commitments by topic

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

## 1. Overarching Commitments

This topic consists of policy commitment indicators only.

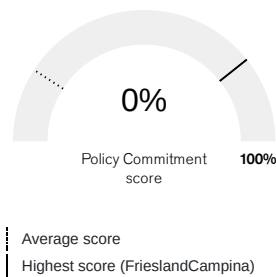


### Policy Commitment

- 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 to 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 principles and importance of the original Code adopted in 1981 and subsequent World Health Assembly (WHA) resolutions. ATNI encourages the company to do so and to continuously consider WHA resolutions that update and clarify the provisions of the Code.
- In addition, HiPP did not share evidence to confirm that its BMS marketing commitments are also applicable to infant formulas for special medical purposes. If HiPP excludes any types of formula from its BMS marketing guidelines, the company is encouraged to apply its BMS marketing commitments to all BMS products, without exception, including formulas for special medical purposes. Furthermore, no evidence was found or provided by HiPP to clearly indicate if the company's BMS marketing commitments extend to all joint ventures and subsidiaries where the company has a holding.

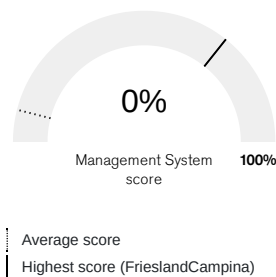
## 2. Advertising and Promotions

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



#### Policy Commitment

- HiPP did not score on this topic since no commitments were found in the company's BMS marketing policy on advertising and promoting BMS in line with the provisions of the Code.
- In order to score in this area, the company should comply with Article 5 of the Code and recommendation 6 of the guidance supported by WHA 69.9, by refraining from advertising BMS through various media channels and prohibiting distribution of samples or promotional materials to caregivers in any setting and via any means. Additionally, the company should avoid point-of-sale promotions and cross-promotion between different types of BMS, ensuring distinct packaging and labeling for each BMS product type.
- HiPP is encouraged to adopt these Code requirements in full.

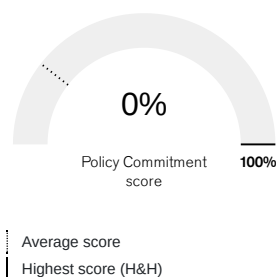


#### Management System

- HiPP shared – under NDA - staff training material developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy. The company did not score on management systems as it did not meet the policy commitments in full.
- HiPP is also encouraged to develop clear and comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing in all markets.

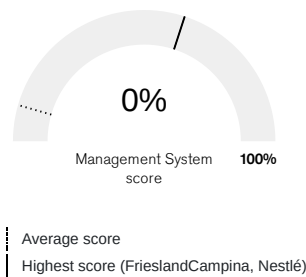
### 3. Healthcare Systems

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



#### Policy Commitment

- HiPP did not score on this topic since no commitments were found in the company's BMS marketing policy on responsible marketing of BMS throughout the healthcare system in line with the provisions of the Code.
- In order to score in this area, the company should comply with Article 6 of the Code and recommendation 6 of the guidance supported by WHA 69.9, by refraining from using healthcare facilities for promoting BMS products, displaying related materials, providing gifts or coupons to caregivers and offering them education on infant and young child feeding, or deploying personnel within these settings. The company should also prohibit demonstrations of formula feeding by its staff and avoid hosting events or campaigns in health facilities.
- HiPP is encouraged to adopt these Code requirements in full.

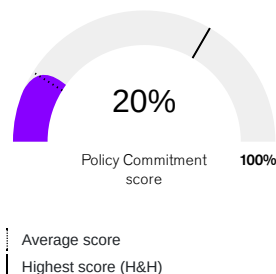


#### Management System

- HiPP shared – under NDA - staff training material developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy. The company did not score on management systems as it did not meet the policy commitments in full.
- HiPP is also encouraged to develop clear and comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing in all markets.

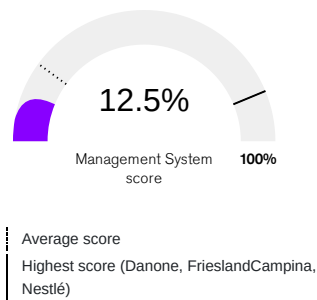
## 4. Donations

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



#### Policy Commitment

- HiPP did not fully score on this topic since limited commitments were found in the company's BMS marketing policy on BMS donations that are in line with the provisions of the Code.
- The company, however, was found to commit to not providing free or reduced-price BMS products and samples to caregivers through health workers or health facilities.
- To improve its score in this area, the company should comply with the Code requirements specified in recommendation 6 of the guidance supported by WHA resolution 69.9, as well as WHA resolutions 47.5 and 63.23, and the Operational Guidance for Infant and Young Child Feeding in Emergencies. The company should comply with the Code recommendations by refraining from donating or distributing any equipment, materials (including educational materials), or services to any part of the healthcare system. In humanitarian settings, BMS donations should be provided only upon official authoritative request, ensuring compliance with Code provisions and quality standards. In social welfare institutions, BMS products are only provided upon request, without using donations for sales inducement or distribution outside institutions.
- HiPP is encouraged to adopt these Code requirements in full.

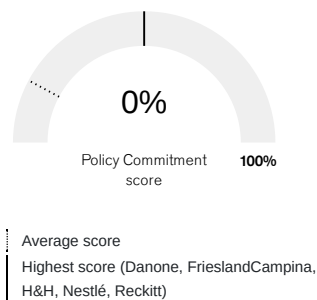


## Management System

- HiPP shared – under NDA - staff training material developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy. The company did not fully score on management systems as it did not meet the policy commitments in full, and no relevant procedures (such as standards of practice on BMS donations) were found or shared by the company.
- To improve its score in this area, HiPP would need to develop comprehensive management systems, procedures, and other clear guidance for its employees across all markets to implement all commitments set out in its policy(ies) relating to responsible BMS marketing.

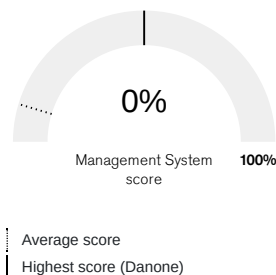
## 5. Healthcare Workers

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



## Policy Commitment

- HiPP did not score on this topic since no clear commitments were found in the company's BMS marketing policy and other internal guidelines – all shared under NDA with ATNI – specifically on the responsible marketing of BMS to healthcare workers that are fully aligned with the provisions of the Code.
- In order to score in this area, the company should comply with Article 7 of the Code and recommendation 6 of the guidance supported by WHA 69.9 by ensuring only factual information is provided to health workers that does not imply bottle-feeding superiority and that is limited to provide guidance on appropriate use of BMS. Any form of financial or material inducements to healthcare staff should be prohibited, and as a BMS company it should not sponsor scientific meetings for health professionals to avoid conflicts of interest.
- HiPP is encouraged to adopt these Code requirements in full.



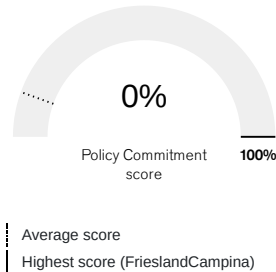
## Management System

- HiPP shared – under NDA - staff training material developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy. The company did not score on management systems as it did not meet the policy commitments in full.
- HiPP is also encouraged to develop clear and comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing in all markets.

## 6. Employee Incentives

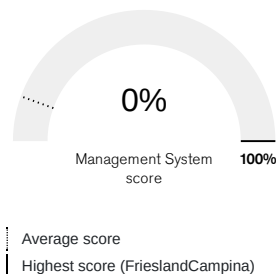
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

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### Policy Commitment

- HiPP did not score on this topic since no commitments were found in the company's BMS marketing policy or other publicly available documents on the incentives of company employees involved in BMS marketing that are in line with the Code.
- In order to score in this area, the company should comply with Article 8 of the Code by excluding the sales volume of BMS products from determining incentives for its employees or distribution partners.



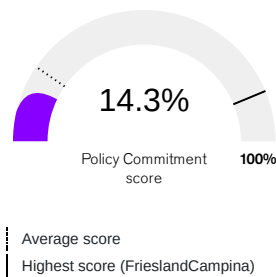
### Management System

- HiPP shared – under NDA - staff training material developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy. The company did not score on management systems as it did not meet the policy commitments in full.
- HiPP is also encouraged to develop clear and comprehensive management systems, procedures and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing in all markets.

## 7. Labeling

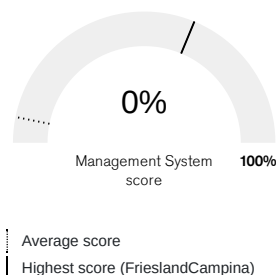
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.

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#### Policy Commitment

- HiPP did not fully score on this topic due to limited commitments found in the company's BMS marketing policy and other internal guidelines – all shared under NDA with ATNI – on the appropriate labelling of BMS products in line with the provisions of the Code.
- HiPP was found to have explicit commitments for infant formula labels to be clear, with information in the appropriate local language(s), and to include a conspicuous statement on the superiority of breastfeeding as well as indicate that the product should be used only on the advice of a health worker as to the need for its use and the proper method of use. The company also commits to not using any text or images on infant formula labels that may idealize the use of BMS.
- However, to improve its score in this area, the company should fully comply with Article 9 of the Code and recommendation 4 of the guidance supported by WHA resolution 69.9 by ensuring that BMS packages include appropriate breastfeeding messages and a clearly recommended age of introduction and use. Labels should also include ingredient information and clear instructions for appropriate preparation, as well as warnings against the health hazards of inappropriate powdered formula preparation. Health or nutrition claims for BMS products should only be included if required by national regulations.

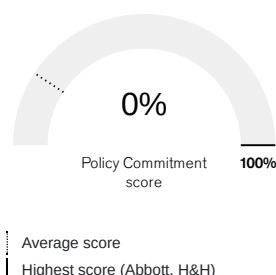


#### Management System

- HiPP shared – under NDA - staff training material developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy. The company did not score on management systems as it did not meet the policy commitments in full.
- HiPP is also encouraged to develop clear and comprehensive management systems, procedures, and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing in all markets.

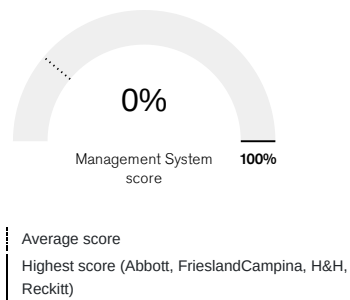
## 8. Product Quality

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



#### Policy Commitment

- HiPP did not score on this topic since no commitments were found in the company's BMS marketing policy or other publicly available documents regarding the company's commitments on the quality of BMS products.
- In order to score in this area, the company should comply with Article 10 of the Code and is encouraged to clearly outline which specific Codex standards it follows at a minimum, and to ensure that the listed standards are regularly revised so that the most updated versions are adhered to.

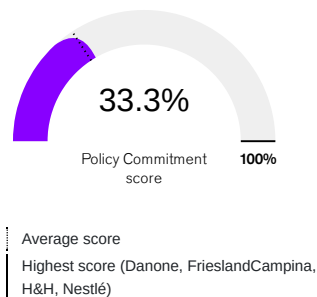


#### Management System

- ATNI was unable to identify documentation about any management systems the company has in place to implement any commitments related to this topic.
- HiPP is encouraged to develop clear and comprehensive management systems, procedures, and other guidance for its employees to implement all commitments set out in its policy(ies) relating to responsible BMS marketing in all markets.

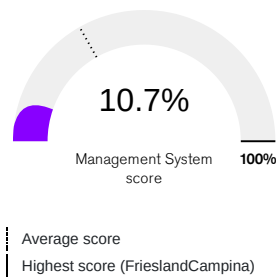
## 9. Implementation and Monitoring

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



#### Policy Commitment

- HiPP did not fully score on this topic since no relevant information was found in the company's BMS marketing policy and other internal guidelines – all shared under NDA with ATNI – in regard to the company's commitments on monitoring its BMS marketing practices.
- The company shared with ATNI under NDA a training developed by the company to direct its marketing personnel on the Code and HiPP's internal marketing guidelines.
- However, to improve its score in this area, the company is encouraged to clearly define as well as effectively communicate formal responsibilities for implementing BMS marketing commitments and to whom these extend to, including on monitoring compliance of the company's practices to the principles of its BMS marketing policy. The evidence shared by the company did not explicitly and sufficiently address these aspects.

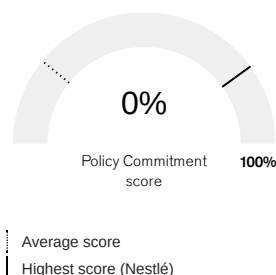


## Management System

- HiPP shared – under NDA – local staff training materials developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy(ies).
- HiPP did not fully score on this topic as no clear evidence was found or provided by the company to substantiate the assessment. However, based on the evidence shared by the company, it was found to have a system in place to communicate its BMS marketing commitments to some of its employees in some markets. In addition, like most companies assessed in the BMS Marketing Index, the company was found to follow globally recognized food safety and quality standards to certify its BMS products, such as BRC and HACCP, which was clearly evidenced in HiPP's 2020 sustainability report.
- To improve its score in this area, HiPP would need to develop clear guidance for its employees and contractual third-parties across all markets on the responsible marketing of BMS as outlined in the company's related policy(ies). The company should also have effective systems in place to monitor and manage incidences of non-compliance with the company BMS marketing policy(ies). The company should also clearly assign executive responsibilities and oversight to ensure the effective implementation of its BMS marketing policy.

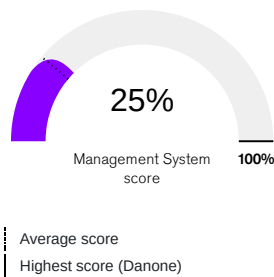
## 10. Lobbying and Influence

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



## Policy Commitment

- HiPP informed ATNI that it represents its interests on BMS 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 BMS 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 the Code and BMS marketing. The company should also commit to not undermining existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code in full. In addition, the company should 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.

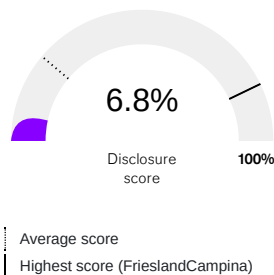


## Management System

- HiPP did not fully score on this topic as no clear evidence was found or provided by the company to fully substantiate the assessment. However, based on information shared by the company, it is evident that HiPP's Board has oversight over lobbying activities.
- To improve its score in this area, HiPP would need to clearly assign executive responsibilities to ensure the effective implementation of its commitments on engaging with stakeholders on BMS marketing and the Code, as well as develop clear systems and control mechanisms such as reporting and internal audits.

## 11. Disclosure

This topic consists of disclosure indicators only.



## Disclosure

- HiPP did not fully score on this topic as there was limited information in the public domain on the company's BMS marketing commitments and related accountability mechanisms.
- Some information was found however on the company's website clearly stating its support for breastfeeding, as well as a published list of some of the trade associations and industry groups the company is a member of, related to BMS.
- HiPP is encouraged to have its BMS marketing commitments available and easily accessible in the public domain and improve its disclosure in various aspects relating to the Code and responsible marketing, including lobbying and accountability.

## Footnotes

1. BMS stands for breast-milk substitutes which include any milks (or products that could be used to replace milk, such as fortified soya milk alternatives), in either liquid or powdered form, that are specifically marketed for feeding infants and young children up to the age of three years. These include: - Infant formula (IF) - Follow-up formula (FUF) - Growing-up milk (GUM) It is important to note that the Code never made exceptions to formulas for or special medical purposes therefore these products are also included within the scope of ATNI's studies. Bottles and teats however are not included in ATNI's assessments as these products generally would not be manufactured by food and beverage companies.
2. 72% of HiPP's global baby food sales are derived from complementary foods.
3. The Country Study score and Corporate Profile score each contribute to 50% of HiPP's BMS 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 observations from online and traditional media.
7. Where companies engaged, these numbers should represent the number of products confirmed to be marketed in these countries as communicated by the companies to ATNI. It is possible however that the number of products and brands assessed are not representative of each of the assessed markets, due to limitations in data collection and limited company engagement.
8. - Infant formula is a BMS product intended for infants younger than six months of age. - Follow-up formula is a BMS product intended for older infants between six months up to one year of age. - Growing-up milks or toddler milks are BMS products intended for young children between one to three years of age. - Product brand relates to observations where no age is specified on a product or no specific product is promoted, but the observation is associated with a BMS brand.
9. This is the company's average score on the 11 topics.
10. Euromonitor retail sales estimates (2021 data) were used to calculate the proportion of companies' global product sales covered per product type. It is important to note however that the underlying data used for the calculations may not be fully representative of the company's markets. Euromonitor International intelligence is used under license. Although Euromonitor aims to correct inaccuracies of which it is aware, it does not warrant that the data will be accurate, up-to-date or complete as the accuracy and completeness of the data and other content available in respect of different parts of the content will vary depending on the availability and quality of sources on which each part is based.
11. Product weighting: 45%
12. Product weighting: 35%
13. Product weighting: 20%