

Reckitt

Headquarters
United Kingdom

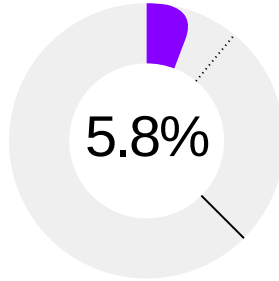
Type of ownership
Public

Estimated percentage of Reckitt's global F&B sales from BMS ¹
98%

Estimated percentage of Reckitt's global baby food sales from BMS ²
100%

Countries covered in country studies
Indonesia/US/Viet Nam

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BMS Marketing Score 2024 ³

--- Average score
| Highest score



Country Studies Score ⁴

0% 3 countries



Corporate Profile Score

11.5%

Important:

The research findings regarding companies' performance in this Index are based on information shared by companies or gathered by service providers, in addition to information that is available in the public domain.

The level of detail and comprehensiveness of information shared by companies and gathered through external service providers varied. In the case of limited or no engagement by companies, this Index may not represent the full extent of their efforts. Similarly, in the case of limited data collected by service providers, the findings of this Index may not provide a comprehensive representation of company practices.

ATNI's research and Indexes do not assess compliance with local regulations or laws, but rather assess private sector performance against international standards and guidance.

BMS COUNTRY STUDIES



Country Studies
Score

0% 3 countries





The Country Studies component of the BMS and CF Marketing Indexes 2024 evaluates the extent to which a company's marketing practices align with specific provisions of the WHO Code (not against local Code-related regulations). The main marketing channels assessed in the Country Studies for the BMS and CF Marketing Indexes 2024 are online points-of-sale, traditional and online media outlets, and product labels which were all assessed according to the NetCode protocol.. Reckitt sells BMS products in three (Indonesia, the US and Viet Nam) of the five countries selected for the assessment which altogether represent >60% of Reckitt's estimated global BMS sales. The Country Studies results for Reckitt 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

Reckitt	Country assessments			BMS market ⁵	
	Total incidences of non-compliance across online, traditional media, and product labels ⁶	Number of product labels assessed ⁷	Company brands found	BMS market share	Proportion of Reckitt's global BMS sales
CHINA	N/A	N/A	N/A	N/A	N/A
GERMANY	N/A	N/A	N/A	N/A	N/A
INDONESIA	54	4	Enfagrow, Enfamil	4%	2%
US	40	26	Enfagrow, Enfamil, Nutramigen	38%	57%
VIET NAM	41	5	Enfagrow, Enfamil, Nutramigen	14%	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 135 incidences of non-compliant marketing practices for BMS products were found for Reckitt. Non-compliant marketing practices were found across online and traditional media channels assessed in the three countries. A total of 35 BMS product labels were assessed from various Reckitt brands.

- In Indonesia, Reckitt's BMS sales represents a relatively small proportion of the Indonesian BMS market, and it also represents a small part of Reckitt's global BMS sales (less than 5%). Still, a total of 41 advertisements and promotions related to BMS brands were found online during the research period and 9 TV advertisements. All 4 product labels assessed contained one or more instances of non-compliance.

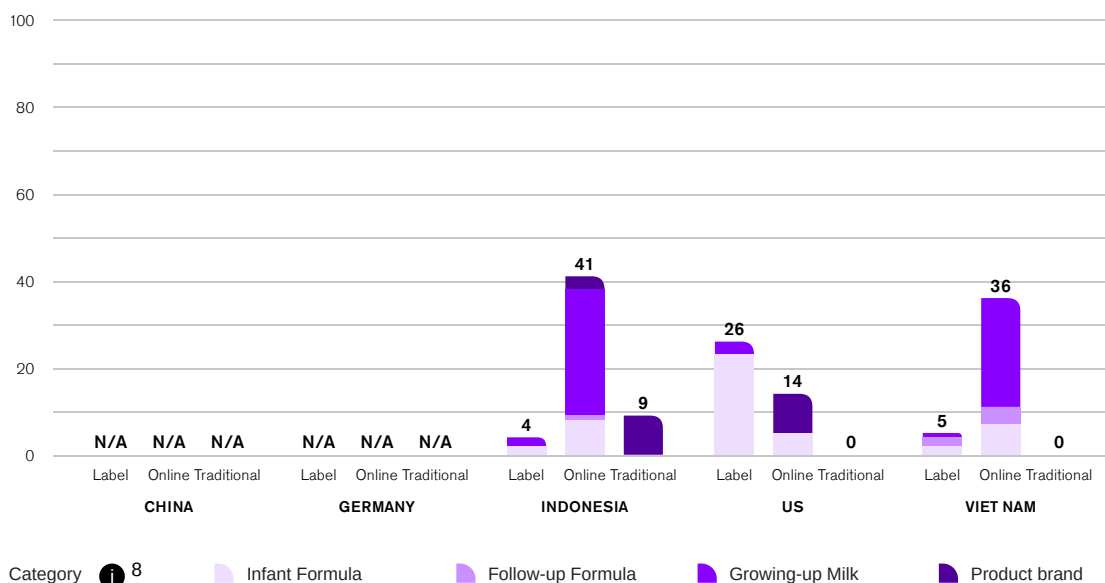
- Reckitt is one of the two major BMS companies in the

US, with a market share of almost 40%, accounting for approximately 57% of its global BMS sales. The US is also the market in which the highest number of product labels were assessed for Reckitt, all 26, assessed contained one or more instances of non-compliance. A total of 40 incidences of non-compliance were found, of which 14 were found on online media channels.

- While Reckitt's BMS sales in Viet Nam represent less than 5% of the company's global BMS sales, the company possesses a notable share of the Vietnamese BMS market, approximately 14%. Thirty-six advertisements and promotions related to BMS brands were found online during the research period; all 5 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

Reckitt's highest number of incidences of non-compliance were found in Indonesia (54), followed by Viet Nam (41) and the United States (40).

Across all country assessments, the majority of incidences of non-compliant marketing practices (91 out of 135 for Reckitt) were identified through the social listening of online platforms, while fewer were identified on traditional media (9). Each of the 35 BMS product labels assessed from various Reckitt brands contained one or more instances of non-compliance. The incidences of non-compliance found online (91) were largely concerning growing-up milks (54) and infant formula (20), whereas advertisements on traditional media concerned brand promotions. Non-compliant labels were found across all types of BMS, but mostly concerned infant formula (27 out of 35).

Online findings

- The majority of advertisements and promotions related to Reckitt's BMS brands online (91 in total) were found in Indonesia (41), followed by Viet Nam (36) and the US (14), all of which are contraventions of the Code.

- Among the total incidences of non-compliance found online, approximately one third were point-of-sale promotions. The majority of these were found on online retailers monitored in Indonesia and Viet Nam. These point-of-sale promotions were mostly for growing-up milks in both Indonesia and Viet Nam (22), while all of the 5 promotions in the US were targeted at children aged 0-12. Despite ATNI's request for Reckitt to verify any contractual relationship with these retailers, confirmation could not be obtained from the company during the verification phase.

- The remaining 60 online observations were found on the company's local websites and social media

platforms and parenting websites, with the highest number of findings in Indonesia (26) and Viet Nam (25), and nine online advertisements found in the US. Across all three countries, an average of two incidences of non-compliance were identified with each observation. Apart from advertising BMS – a non-compliance with the Code in itself – other common incidences found with those advertisements included providing education and information about infant and young child nutrition and feeding. Other, but less common, observations include incentivizing the purchase of those products through offering discounts, gifts, and prizes (observed in Indonesia and the US), as well as soliciting caregivers to sign-up to online contests and sponsoring healthcare events in the US.

- The majority of advertisements also included claims, ranging from 33% of the identified advertisements in the US containing at least one type of claim to 85% and 96% in Indonesia and Viet Nam, respectively.

Traditional media findings

- In total, 9 BMS advertisements by Reckitt were identified on television, all related to BMS brand commercials in Indonesia. All 9 advertisements had at least one type of claim. No advertisements were found for Reckitt BMS brands on traditional media channels in the US or Viet Nam during the research period.

BMS product label

- A total of 35 Reckitt's BMS product labels were assessed across the three markets, 26 of which were in the US, no product labels were found to be fully Code-compliant. The average number of incidences of non-compliance per product label per market ranged from three in Indonesia and Viet Nam to six in the US. Generally, the majority of labels with incidences of non-compliance were identified on infant formula products. In the US, 23 out of 26 labels assessed were from infant formula products, specifically, 19 were intended for ages 0-12.

- Almost all labels were missing a statement on the importance of exclusive breastfeeding in the first six months and continued breastfeeding for up to two years or beyond. All labels assessed had nutritional, health and/or marketing claims. Other common observations classified as non-compliant with the Code were mostly found on Reckitt's product labels in the US. These include text or images that may idealize the

use of breast-milk substitutes and discourage or undermine breastfeeding, as well as endorsements by professionals. Additionally, several product labels failed to indicate the recommended or appropriate age range near the product name and did not state the need to only use the product on the advice of a health professional before deciding to feed with formula, irrespective of the age at which formula is introduced.

- 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. As Reckitt did not respond to ATNI during the verification phase, the company had not provided images of product labels as requested by ATNI. The company communicated with ATNI at a later stage when the assessments were being finalized, at which stage ATNI only requested images of the product labels in Viet Nam where all assessments had been incomplete. Incomplete assessments remained for two products in the US and one product in Indonesia. 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 135 incidences of non-compliant marketing practices for Reckitt BMS products observed across online and traditional media channels in the three markets assessed, the company is strongly encouraged to strengthen its responsible BMS marketing policies and ensure their full alignment with the recommendations of the Code and all subsequent relevant resolutions, including the guidance supported by WHA resolution 69.9. ATNI has developed a model company policy on the responsible marketing of BMS which can guide the company on how to incorporate Code provisions and align with the latest public health requirements in practice.

- Reckitt 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.

- Reckitt 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.

- Reckitt is encouraged 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.

- Clear evidence was found of Reckitt applying point-of-sale promotions for growing-up milks in Indonesia and Viet Nam, and promoting these on online platforms, which is contrary to the requirements of the Code, specifically the guidance supported by WHA resolution 69.9 that extended the scope of the Code to growing-up milks. Therefore, ATNI urges Reckitt to ensure its commitments are extended to include growing-up milks in all markets.

- All of the labels assessed across all three countries were found to be non-compliant with the Code requirements in at least one aspect. The average number of incidences of non-compliance on BMS product labels by Reckitt was found to be higher in the US compared to Indonesia and Viet Nam. Reckitt 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. This includes ensuring that product labels clearly indicate a statement promoting the importance of exclusive breastfeeding for the first six months and continued breastfeeding up to two years or beyond, and that labels do not include health or nutrition claims,

except if specifically provided for in national legislation.

- ATNI is calling on Reckitt 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

11.5%

The Corporate Profile component of the BMS and CF Marketing Indexes 2024 evaluates the extent to which a company's policies align with various provisions of the Code, the effectiveness of its related management systems as well as the company's level of disclosure on commitments relating to BMS marketing. Reckitt's BMS marketing commitments were assessed across 11 topics that cover different aspects of the Code on which the company scored an average of 44%. 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 Reckitt 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-140rlzsq.accesstonutrition.org/app/uploads/2024/03/Geographic-penalty.pdf>

Geographic application by Reckitt 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 ⁹	Product type	Percentage of Reckitt's global sales from markets where BMS commitments are upheld ¹⁰	Geographic penalty applied	Final Corporate Profile score
43.8%	Infant formula ¹¹	19%	72.9%	11.5%
	Follow-up formula ¹²	27%	65.7%	
	Growing-up milk ¹³	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 Reckitt's RB's Policy and Procedures on the Marketing of Breast-Milk Substitutes (2020) 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 Reckitt's global product sales covered per BMS product type.

Infant formula

The company only upholds its commitments for this product type in higher-risk countries, even when national regulations implementing the Code are absent or weaker than the company policy.

Additionally, Reckitt's BMS Marketing Policy does not apply to all infant formulas for special medical purposes it only covers formula with partially hydrolyzed protein, that is lactose free/reduced, soy based, and anti-reflux formula from this category.

Consequently, the company commitments are upheld only for products representing 19% of its global infant formula sales resulting in the application of a geographic penalty of 73% for this product type.

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

Follow-up formula

The company only upholds its commitments for this product type in higher-risk countries, even when national regulations implementing the Code are absent or weaker than the company policy.

Additionally, Reckitt's BMS Marketing Policy does not apply to follow-up formulas for special medical purposes.

Thus, commitments for follow-up formula products are only upheld in higher-risk markets, and for products that are not for special medical purposes, which represents 27% of the company's global follow-up formula sales. The corresponding geographic penalty for this product type is 66%.

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

Growing-up milk

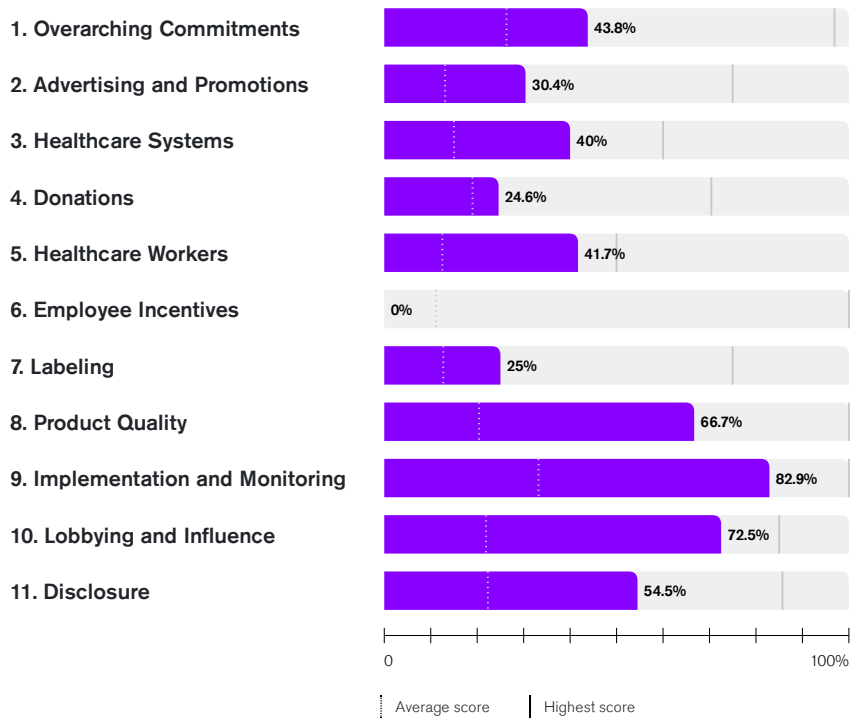
The company does not apply its BMS marketing commitments to growing-up milks. This is evident from the country assessments where the majority of the observed incidences of non-compliance were attributed to growing-up milk products.

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

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

Based on the company's application of its BMS commitments to the different BMS product categories across its global markets, the final Corporate Profile score is 12%.

Topics Overview



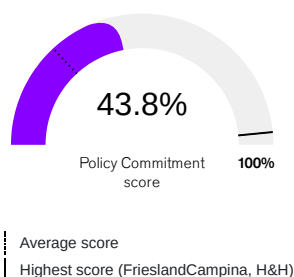
These represent the initial overall scores before applying the penalty.

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.

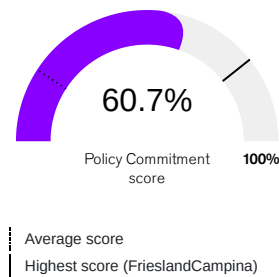


Policy Commitment

- Reckitt's overarching commitments to the Code had not changed since the 2021 assessment. The company continues to clearly state its support for exclusive breastfeeding in the first six months and continued breastfeeding to two years or beyond, as well as for the introduction of appropriate complementary foods from the age of six months.
- Although when compared to the other companies assessed, Reckitt's overarching commitments are relatively well-aligned with the principles of the Code, the company still does not fully acknowledge the specifications to the Code provided by the World Health Assembly (WHA) in resolution 69.9 and the accompanying guidance on ending the inappropriate promotion of foods for infants and young children. Furthermore, WHA resolution 71.9, which calls for continued implementation of the recommendations of has not been acknowledged by the company either.
- Reckitt did not receive a full score on the new indicator that assesses whether companies apply its BMS marketing commitments to all types of formula, including formulas for special medical purposes. While the company does not consider products intended for the treatment of medical conditions as breast-milk substitutes, the Code regards all formulas for infants and young children as BMS, whether used to meet the normal nutritional or special medical needs of infants.
- Additionally, Reckitt did not receive a full score on the indicator that assesses the application of BMS marketing commitments to all joint ventures and subsidiaries where the company has a holding. It was observed that the company applies these commitments only to entities where it holds a majority ownership stake greater than 50%.

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

- Reckitt's policy commitments relating to advertising and the promotion of BMS, which are relatively well-aligned with the requirements of the Code, have not changed since the 2021 assessment. These remain publicly disclosed.
- Compared to the last assessment in 2021, several of ATNI's indicators in this topic have been adapted to capture companies' explicit commitments in digital environments too, such as advertising on social media and point-of-sale promotions on online retail stores, as well as establishing contact with caregivers through baby clubs and social media groups – all actions that are not compliant with the Code.

Reckitt does not show evidence of these commitments in full, the company is advised to include explicit statements on which forms of media and channels BMS marketing commitments apply to, particularly on how they apply in the digital environment, and to which forms of retail.

- Indicators were also revised to ensure accurate and complete inclusion of all recommendations of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA resolution 69.9, for example by adding indicators to address cross-promotion of BMS products and educating caregivers on infant and young child feeding, both of which BMS companies should not do according to the Code.

Reckitt was found to demonstrate limited adherence to the guidance outlined in WHA 69.9.

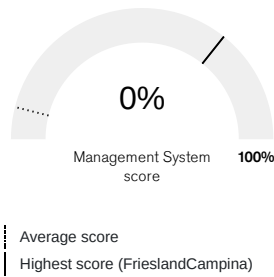
It was one of the only two companies to explicitly commit not to distribute any gifts, articles or utensils that may promote the use of BMS or bottle feeding in any setting or via any means to pregnant women and mothers of infants.

However, while committing that all employees will not engage in any direct or indirect contact with pregnant women or mothers of infants about BMS products, the policy lacks specificity regarding forms of contact with these groups.

While the company's BMS Marketing Policy does not allow direct educational activities involving its staff, it does not extend to indirect educational efforts. Therefore, ATNI recommends that Reckitt align with recommendation 6 of WHA 69.9 and broaden the policy's scope to cover indirect educational activities as well.

Furthermore, Reckitt's policy lacks a commitment to avoid cross-promoting different types of BMS products through distinct packaging designs and labels.

- In its BMS Policy Marketing, Reckitt is encouraged to consider referring to caregivers of infants and young children, rather than solely addressing mothers of infants. This adjustment would explicitly extend the company's commitments to all caregivers, ensuring inclusivity and comprehensive coverage.
- Reckitt is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code.

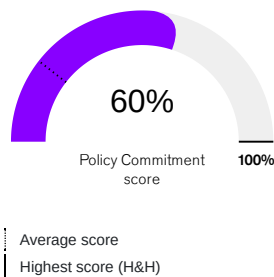


Management System

- The company, however, does not score on management systems as the instructions and procedures were not found to cover the implementation of the company's commitments consistently and comprehensively on public advertising and promotion of BMS.
- Reckitt 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.

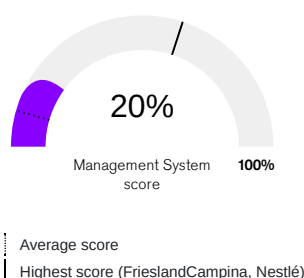
3. Healthcare Systems

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

- Reckitt's policy commitments relating to marketing BMS throughout the healthcare system, which are relatively well-aligned with the requirements of the Code and remain publicly disclosed, have not changed since the 2021 assessment.
- Compared to the last assessment in 2021, indicators were slightly revised to ensure an accurate assessment of recommendation 6 of the guidance supported by WHA resolution 69.9 to evaluate whether companies have explicit commitments in place not to use health facilities to host events of any kind nor to give out gifts or any other offering to caregivers of infants and young children, to avoid conflicts of interest. Similar to the 2021 assessment, and like most of the BMS companies assessed in this Index, Reckitt did not score on the indicators that capture these Code commitments that specifically relate to WHA resolution 69.9.
- Reckitt is one of only three companies among the 18 assessed to have scored on having explicit commitments not to provide or pay for 'professional service representatives' or similar personnel to work in the healthcare system.
- Reckitt is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code.



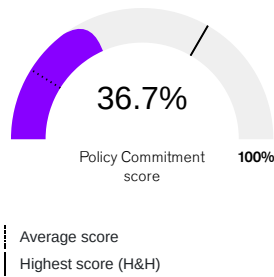
Management System

- Reckitt shared – under NDA - global staff training materials and some local procedure manuals developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy(ies). The company does not fully score on management systems as it does not have all Code provisions in place. Although it is one of four companies among the 18 assessed that score on management systems in this topic, these can be improved by providing more concrete examples of what company personnel should or should not do in each context.

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.





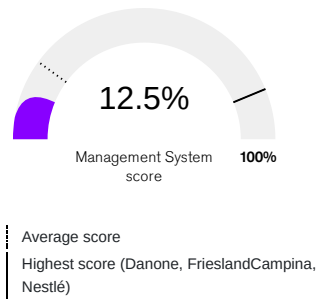
Policy Commitment

- Reckitt's policy commitments relating to BMS donations within the healthcare system, in humanitarian settings and emergencies, and in social welfare institutions are partially aligned with the requirements of the Code. These commitments are publicly disclosed.
- Compared to the last assessment in 2021, commitments on donations of BMS are now assessed in a separate topic and across several indicators, to ensure a more accurate assessment of the specific requirements relating to BMS donations.
- In regard to BMS donations, Reckitt has shown Code compliant commitments by stating that it would not provide free or low-cost supplies of the BMS products covered by its policy 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 was found to have explicit requirements in place in the case of an official authoritative BMS donation request, including ensuring that distribution is targeted and not delivered directly to caregivers, and that supplies are based on identified need.

However, no explicit statement was found to guarantee that supplies will continue for as long as the infants concerned need them and to avoid using such donations as a sales inducement. Additionally, the company policy does not explicitly state that products should not display company brands, and that supplies should have a 6-month shelf life from the moment of delivery.

- Similarly, although the company commits not to distribute BMS product donations or low-cost supplies for use outside of the social welfare institutions where infants and young children require them, it does not explicitly prevent the use of such donations as a sales inducement as per Article 6.6 of the Code.
- Furthermore, Reckitt continues to provide BMS product samples for research and product evaluation purposes while the Code does not allow their provision to healthcare institutions under any circumstances and for any reason, even if the products are not directly provided to consumers or patients.
- Reckitt also falls short of meeting the Code requirements on donations by allowing the provision of educational materials and/or practice-related items to healthcare professionals, which is specifically addressed in recommendation 6 of the guidance supported by WHA resolution 69.9 to avoid due to potential conflict of interest.
- Reckitt is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code.

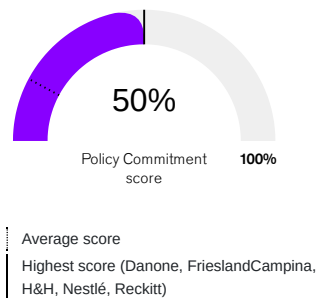
Management System



- Reckitt shared – under NDA - global 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). Even though Reckitt provides clear instructions to staff on how to interpret and apply relevant commitments related to BMS product donations in humanitarian and emergency settings, the company does not fully score on management systems since it does not have all Code provisions in place. Regarding procedure manuals, there was no information on the public domain or shared with ATNI.

5. Healthcare Workers

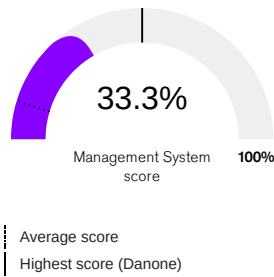
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Policy Commitment

- Reckitt's policy commitments relating to marketing BMS to healthcare workers, which are relatively well-aligned with the requirements of the Code and remain publicly disclosed, have not changed since the 2021 assessment.
- Compared to the last assessment in 2021, a new indicator was introduced for this topic to specifically assess the instructions provided to healthcare workers on the appropriate preparation of powdered formulas and if these are based on WHO/FAO guidelines and Codex Standards as referenced by WHA resolutions 58.32 and 61.20. Reckitt did not score on this indicator and none of the 18 companies assessed met this requirement.
- Reckitt however is one of only four companies out of the 18 assessed to explicitly state that any material which contains information about formula use provided to health workers will include information on the social and financial implications of formula use and the health hazards of inappropriate feeding methods, unnecessary or improper use of BMS and their inappropriate preparation, as per the requirements of the Code.
- Two other indicators were slightly revised to ensure an accurate assessment of recommendation 6 of the guidance supported by WHA resolution 69.9 to evaluate whether companies have explicit commitments in place not to offer any financial or material inducements (no gifts or incentives of any form or value) to healthcare workers or their families, and not to sponsor any scientific meetings, fellowships, study tours, and research grants for health professionals, to avoid conflicts of interest. Similar to the 2021 assessment, and like most of the BMS companies assessed in this Index, Reckitt did not score on these indicators that capture the Code commitments that specifically relate to WHA resolution 69.9.
- Reckitt is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code.

Management System

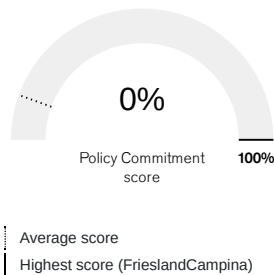


- Reckitt shared – under NDA – global staff training materials and some local procedure manuals developed by the company to guide its employees on the responsible marketing of BMS as outlined in the company's related policy(ies). The company does not fully score on management systems as it does not have all Code provisions in place. However, in regard to the commitments met by the company on marketing BMS to healthcare workers that are in line with the Code, the guidance provided by the company to follow and apply these commitments is clear, complete and consistent across different markets, thus Reckitt scores on those elements. However, these can be improved by providing more concrete examples of what company personnel should or should not do in each context.

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.

Policy Commitment

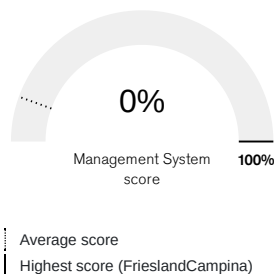


- Reckitt continues not to commit to exclude the volume and/or value of sales of products covered by the company's BMS marketing policy from bonus calculations for sales representatives, as well as from setting quotas for the sales of such products.

Therefore, the company is not aligned with the requirements of the Code, which explicitly states that incentive measures should not include the volume or sales values of BMS products, regardless of whether they are considered individually or alongside other product sales.

- Reckitt is encouraged to address the gaps identified to revise its policy to align with the requirements of the Code, specifically Article 8.

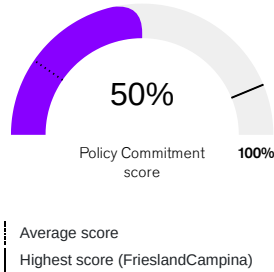
Management System



- Reckitt shared – under NDA - global 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). The company did not score on management systems as its policy commitments are not in line with the Code. Regarding procedure manuals, there was no information in the public domain or shared with ATNI. Reckitt should bolster its management systems to deliver consistent compliance with its stated commitments, once brought into full alignment with the Code.

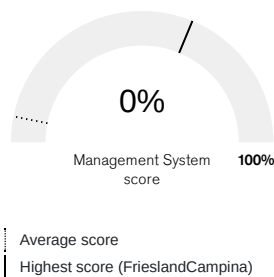
7. Labeling

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



Policy Commitment

- Reckitt's policy commitments relating to the labeling of BMS products, which are relatively well-aligned with the requirements of the Code, have not changed since the 2021 assessment. These remain publicly disclosed.
- Compared to the last assessment in 2021, the information required by the Code on labels of powdered formula are assessed in more detail to evaluate whether companies have specific commitments covering each requirement as per WHA resolutions 58.32 and 61.20. No commitments were found for Reckitt regarding these requirements for powdered formula labels, resulting in the company not scoring on this indicator.
- Although the company was found to have explicit commitments pertaining to the requirements described in Article 9 of the Code, it did not fully score on some, particularly where no commitments were found on ensuring the appropriate age range is stated on the labels. Commitments were also not found for Reckitt that cover the Code labeling requirements strengthened by the guidance on ending the inappropriate promotion of foods for infants and young children that is supported by WHA resolution 69.9.
- Reckitt continues to not explicitly commit to not place any health or nutrition claims on its BMS products, unless specifically provided by local legislation, as per WHA resolutions 58.32, 63.23 and 69.9.
- Reckitt is encouraged to consider the gaps identified to revise its policy to better align with the requirements of the Code.

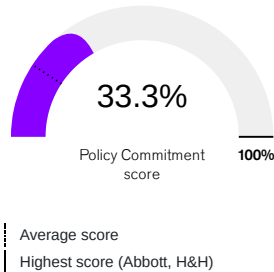


Management System

- Reckitt shared – under NDA – global 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). The company does not score on management systems as it does not have all Code provisions in place. Also, in regard to the commitments met by the company on labeling BMS products that are in line with the Code, the guidance provided by the company to follow and apply these was not found to be clear, complete or consistent. Regarding procedure manuals, there was no information on the public domain or shared with ATNI. Reckitt is encouraged to improve its guidance in these aspects and develop related procedures that outline clear standards of practice in labeling BMS products.

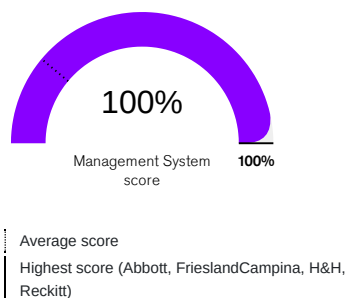
8. Product Quality

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



Policy Commitment

- Compared to the BMS/CF Marketing Index 2021, companies' commitments on this topic are evaluated in more detail to ensure its commitments relating to Article 10 of the Code are accurately assessed.
- Reckitt did not fully score on this topic since its policy commitments relating to the quality of BMS products were not comprehensive. This is because the company does not specify in its policies (BMS marketing policy and internal quality manuals) all Codex standards relating to BMS products that would apply at a minimum.
- Reckitt is encouraged to explicitly state all specific Codex standards it follows at a minimum.

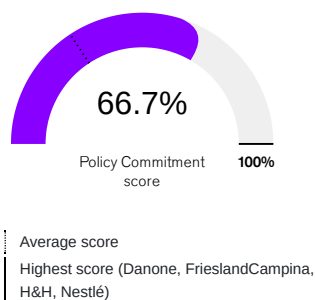


Management System

- Reckitt shared – under NDA - global procedure manuals developed by the company to explain the quality management systems for its products, including BMS. The company was one of four companies among the 18 assessed found to have clear procedures on implementing the applicable Codex standards that the company has explicitly listed.

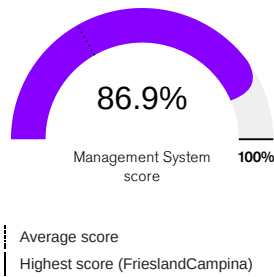
9. Implementation and Monitoring

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



Policy Commitment

- Reckitt's policy commitments relating to monitoring compliance of its marketing practices to the principles of its BMS marketing policy have not changed since the 2021 assessment. These commitments, which specifically pertain to Article 11 of the Code, remain publicly disclosed.
- The company is encouraged to make its commitments more explicit by stating that it will not undermine and support existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code in full.

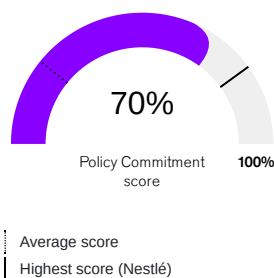


Management System

- Reckitt shared – under NDA - global staff training materials and some local procedure manuals developed by the company to guide its employees and contractual third parties on the responsible marketing of BMS as outlined in the company’s related policy(ies), as well as effective monitoring and management of incidences of non-compliance with the company policy(ies).
- Reckitt was found to clearly assign executive responsibilities for the implementation of the company’s BMS marketing policy. However, it could not provide evidence of making relevant executives aware of their responsibilities under the company’s own policies nor clear evidence of assigning the Board responsibilities for overseeing the implementation of these BMS marketing commitments.
- The company demonstrates a commitment to addressing incidences of non-compliance as outlined in its BMS marketing policy. However, no clear guidelines were found in the public domain or shared by the company to explain the company’s process for taking corrective actions and the responsibilities for employees and third parties involved.
- To improve its score on this topic, Reckitt is encouraged to provide clear guidelines regarding the process for corrective actions and the responsibilities of both employees and third parties involved.

10. Lobbying and Influence

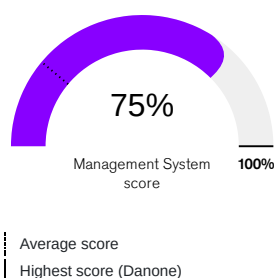
This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% each to the topic score.



Policy Commitment

- Reckitt has a publicly available policy on transparent interaction with authorities and organizations which is also applied when engaging on issues relating to BMS and the Code. Based on this policy, Reckitt continues to cover the relevant commitments assessed in this topic. However, the company is encouraged to improve its lobbying policy by explicitly stating that the purpose of all lobbying is to support the public interest as well as to meet the company’s objectives.
- Like other companies, Reckitt did not show commitments not to undermine or support existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code in full.

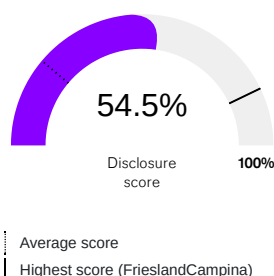
Management System



- Based on Reckitt's related policies, the company clarifies that its Board has oversight of its global advocacy policy and that it names an executive function with the responsibility of implementing this policy. The company also provides clarity on control mechanisms (e.g. reporting to the Board, internal audits). However, no evidence was found in the public domain, nor provided by the company, that the company's Board has oversight of its lobbying positions and activities. To fully score on this topic, Reckitt is encouraged to improve on this aspect.

11. Disclosure

This topic consists of disclosure indicators only.



Disclosure

- In regard to commitments that were found for Reckitt that are in line with the Code, the level of disclosure on these commitments is relatively high and has not changed since the 2021 assessment.
- However, Reckitt can improve on this topic by disclosing information about its internal assessments of compliance with the commitments in its BMS marketing policy, as well as disclosing the full external auditor reports, and not just summaries of them. Additionally, Reckitt is encouraged to disclose each complaint or criticism made by stakeholders on the company's BMS marketing and explain how it responds to each of those rather than providing a general public statement.
- Since the last BMS/CF Marketing Index 2021, a few indicators have been added to further assess companies' level of disclosure in lobbying on BMS marketing issues and the Code. Similar to the 2021 assessment, Reckitt falls short in disclosing lobbying-related activities. No information was found in the public domain nor shared by the company of an assessment of the company's compliance with its global advocacy policy. Like most companies assessed in this iteration, no information was found either on Reckitt's website of its interactions, or that of its trade associations, in legislative processes related to the Code and BMS marketing, nor of links to relevant external platforms that may include this information. Additionally, the company does not explicitly state which public policy frameworks and relevant laws, standards, and codes are respected when lobbying. Although Reckitt is part of the EU transparency register, ATNI advises the company to also follow other key public policy frameworks in private sector engagement and lobbying such as the WHO framework of engagement with non-state actors and OECD principles for transparency and integrity in lobbying, among others, and to publicly disclose this information in its website/reports.
- Reckitt is encouraged to consider the gaps identified in its level of disclosure and have this information available and easily accessible in the public domain.

Footnotes

1. BMS stands for breast-milk substitutes which include any milks (or products that could be used to replace milk, such as fortified soya milk alternatives), in either liquid or powdered form, that are specifically marketed for feeding infants and young children up to the age of three years. These include: - Infant formula (IF) - Follow-up formula (FUF) - Growing-up milk (GUM) It is important to note that the Code never made exceptions to formulas for special medical purposes therefore these products are also included within the scope of ATNI's studies. Bottles and teats however are not included in ATNI's assessments as these products generally would not be manufactured by food and beverage companies.
2. All of Reckitt'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 Reckitt's BMS Marketing Index score.
4. This represents the average score of three country assessments: Indonesia, US 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%