

# Kraft Heinz

**Product categories assessed**

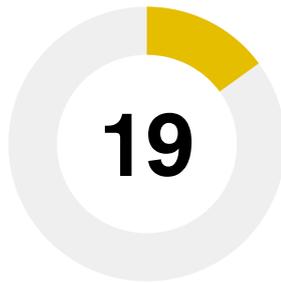
Baked Goods|Processed Meat and Seafood|Concentrates|Dairy|Juice|Processed Fruit and Vegetables|Ready Meals|Sauces, Dressings, Condiments|Soup|Sweet Spreads|Savory Snacks

**Percentage of company global sales covered by Product Profile assessment**  
70-75%

**Headquarters**  
U.S.

**Number of employees**  
37000

**Type of ownership**  
Public



Rank 19 / Score 1.5  
Rank 20 (2018)



**Product Profile** <sup>1</sup>  
Rank 20 / Score 3.3  
Rank 7 (2018) <sup>2</sup>



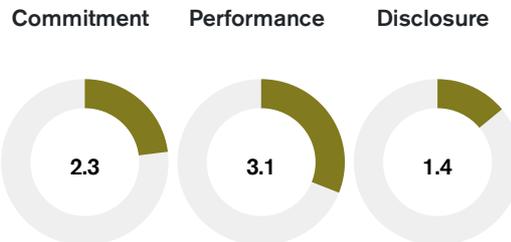
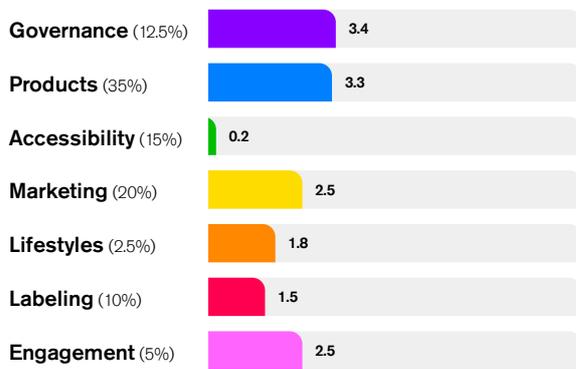
**BMS/CF Marketing** <sup>3</sup>  
Rank 3 / Score 38%  
Rank 6 (2018)

**Important:**

The findings of this Index regarding companies' performance rely to a large extent on information shared by companies, in addition to information that is available in the public domain. Several factors beyond the companies' control may impact the availability of information such as differences in disclosure requirements among countries or capacity constraints within companies, amongst others the Covid-19 pandemic. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

## Corporate Profile

**Rank 19    Score 1.5**



The bar graph to the left shows company performance across the seven Index categories, which are key topic areas of assessment, and scores are shown for each category. The circles above provide an alternate view on the company's overall results, showing the score per indicator type. The Commitment, Performance, Disclosure score only applies to category scores and not to the BMS/CF Assessment.

An adjustment of -0.93 to the company's score has been made based on its score in the BMS/CF Marketing Index 2021.

**Company BMS/CF Scorecard:** [https://new-l40rlzsq.accesstonutrition.org/app/uploads/2021/06/ATNI\\_Scorecard\\_KraftHeinz.pdf](https://new-l40rlzsq.accesstonutrition.org/app/uploads/2021/06/ATNI_Scorecard_KraftHeinz.pdf)

## Main areas of strength

- **GOVERNANCE:** Since 2018, Kraft Heinz has made progress regarding its nutrition governance. Aside from including a focus on health and nutrition in its strategic commitments, the company has disclosed commitments to deliver more healthy foods and shares that nutrition considerations are factored into its acquisitions, disposals, JVs, or partnerships. The CEO has formal accountability for implementing the company's nutrition strategy, with remuneration linked to performance on these objectives, while ESG oversight is assigned to the Board of Directors. The company has also improved its nutrition reporting compared to 2018.

- **PRODUCTS:** Since 2018, and has adopted 'Global Nutritional Guidelines' which list thresholds for nutrients to limit, by product category – considered by ATNI a precursor to a full Nutrient Profiling Model (NPM). Kraft Heinz reports that it exceeded its target of reaching 70 percent compliance with its 'Global Nutritional Guidelines' four years early, and has committed to achieving 85 percent portfolio compliance by 2025. The company also publicly discloses the number of products that meet with its guidelines, at 76 percent in 2019 according to the company's '2020 Environmental Social Governance (ESG) Report'.

- **PRODUCTS:** Regarding the reformulation of products, Kraft Heinz has set specific and measurable targets to reduce the levels of salt/sodium, saturated fats, and calories in all its relevant products and categories, globally – a positive development compared to 2018. The company also has a public statement that its approach to reformulation is aligned with (inter)national dietary guidelines, including the World Health Organization (WHO), the European Food Safety Authority and the National Academies of Sciences, Engineering and Medicine.

- **MARKETING:** Kraft Heinz is a member of Children's Food and Beverage Advertising Initiative (CFBAI) and has developed its own public pledge on responsible marketing to children which complies with the initiative's "core commitments" for its home market, the US. This includes not marketing or advertising to children under 12 years when they represent 30 percent or more of an audience (an improvement from 2018). The company is still one of the few that commits to not market in primary or secondary schools.

- **LIFESTYLES:** The company has improved with regards to offering health and wellness support to its employees. Kraft Heinz launched its new 'LiveWell' health and wellness platform in the US, and is expanding this globally through a portfolio of available benefits, such as biometric screenings, physical and step challenges, yoga classes, and nutritious/healthy eating options. This program is available to some employees and family members, and the company has expanded this to including a focus on physical activity. Regarding performance in this area, Kraft Heinz has included all social ecological model elements (SEM), that state health is affected by lifestyle and behavior choices which are directly and indirectly influenced through different levels of the environment.

## Priority areas for improvement

- **SCORES AND RANKS:** Kraft Heinz ranks 19th on the Global Index with a score of 1.5 out of 10; while low, this is an improvement since 2018, when it scored 0 (after the BMS/CF Index adjustment). This is the score after a -0.9 adjustment for the company's performance on the BMS/CF Index.

- **GOVERNANCE:** Although Kraft Heinz has committed to address undernutrition in both its commercial and non-commercial approaches, the company has provided limited information on its plans, strategies, or activities to do so (Collaboration with Rise Against Hunger contributing to their meal packs by with vitamin and mineral sachets). As such, it is recommended the company incorporates the needs of priority populations at risk of malnutrition in its commercial strategy, and use its research and development (R&D) strategy to carry out research to address the needs of such groups, such as developing products aimed at addressing micronutrient deficiencies. The company has an annual management review, globally, but could consider implementing an annual audit to further improve in this area.

- **PRODUCTS:** The company is encouraged to adopt a full NPM (preferably government-endorsed), which includes positive nutrients (e.g., whole grains, and fruit, nuts, and legumes) and covers all relevant categories. In addition, the company is advised to publicly commit to eliminating industrially produced trans fats (also for outside the US market) from all its products, in alignment with WHO's goal. Moreover, while Kraft Heinz has invested and developed products with smaller packaging and serving sizes to improve consumer portion control in its home market, the company is encouraged to extend its efforts to multiple products and categories globally. The company is also advised to carry out research to demonstrate efficacy of such efforts on consumer portion control and behavior, and disclosure of all activities is recommended.

- **ACCESSIBILITY:** As in 2018, Kraft Heinz shows proof of philanthropic activities to address the accessibility of some of its micronutrient fortified products. Kraft Heinz is recommended to adopt a commercial policy and strategy to address the affordability and physical accessibility of all healthy products in all its active markets, taking into account how it could reach low-income populations, or populations in rural or urban areas that lack regular access to healthy, affordable food.

- **MARKETING:** Kraft Heinz has maintained its public commitment with CFBAI regarding responsible marketing to children and discloses its policy that applies to selected media channels. However, the company does not adopt the International Chamber of Commerce (ICC) Code of marketing commitments and has not improved on the transparency of its advertising pledges and practices. In addition, most commitments are limited to its major or home markets. The company is encouraged to improve transparency and make its commitments globally applicable. With regards to the auditing of compliance, Kraft Heinz is encouraged to expand the scope to all audiences and all media, globally. The company could consider improving in this area further by using an

- **LABELING:** Regarding the labeling of products, the company has committed to showing nutritional information Front-of-Pack (FOP) in numeric format. It has rolled this commitment out to Australia & New Zealand, the UK and the US, and provides nutrition information online for the UK, Australia and Europe, in addition to using SmartLabel in the US.

- **ENGAGEMENT:** The company is one of four assessed to have effective management systems in place to manage and control their lobbying: such as an internal whistleblowing mechanism; Board oversight of their lobbying positions, processes, and practices; and internal audits of their lobbying activities. Kraft Heinz also discloses memberships of industry associations to which it pays dues over \$50,000 and the precise amount of dues these associations use for lobbying.

independent external auditor and implementing a response mechanism to ensure corrective measures are taken regarding any non-compliance with its marketing policy. The company should expand its commitments to not market in primary or secondary schools to its global markets and include commitments to not market near schools (which is industry best practice).

- **LIFESTYLES:** The company does not show a public commitment to allow parents to take paid parental leave, or to provide breastfeeding mothers with appropriate working conditions and facilities supporting breastfeeding at work. Kraft Heinz is advised to strengthen its global practices and policies to support employee health and wellness at work. The company is encouraged to offer paid maternity leave for six months to employees, appropriate breastfeeding facilities (i.e., a private room or storage) on site, and flexible working schedules. The company could also consider improving its healthy eating and lifestyle programs in communities further by (co)implementing with groups that have relevant expertise and strong leadership in this process, and by having the program evaluated by independent groups with relevant expertise (i.e., third-party evaluation) globally, and disclosing this.

- **LABELING:** Kraft Heinz has limited commitments in place regarding labeling of products. The company mentions adhering to Codex Alimentarius guidelines in related to infant and young children product improvement. The company is advised to adopt and publish a comprehensive labeling policy covering all its products to ensure that nutrition information is provided on all packaged food and beverage products. The company is advised to further strengthen its labeling performance by specifically committing to comply with Codex Guidelines when using health and nutrition claims on products in countries where no national regulatory system exists. It is also advised to only use claims on healthy products that have been fortified meeting Codex and WHO/Food and Agriculture Organization (FAO) guidelines on food fortification with micronutrients, and are considered 'healthy' using a government-endorsed NPM.

- **ENGAGEMENT:** The company is encouraged to refine its responsible lobbying policy and commit to only lobby in support of measures designed to improve health and nutrition that have a solid grounding in independent, peer-reviewed science. It is also advised to increase transparency about its lobbying efforts on nutrition-related topics and disclose any potential governance conflicts of interest and Board seats at industry associations. Moreover, the company is recommended to commit to playing an active and constructive part in supporting governments' efforts to combat all forms of malnutrition.

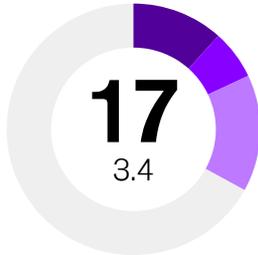
- **ENGAGEMENT:** While Kraft Heinz engages with the Portion Balance Coalition, which makes use of external academic advisors, little evidence was found of company-specific engagement with stakeholders in developing its nutrition strategy. The company is encouraged to conduct well-structured and focused engagement with a variety of independent stakeholders that have expertise in nutrition and addressing malnutrition, to gather feedback and strengthen their strategies and policies.

- **BREAST-MILK SUBSTITUTES AND COMPLEMENTARY FOODS (BMS/CF):** Although KraftHeinz's BMS Marketing

Charter applies globally to both infant and follow-on formula, the policy still does not fully align to The Code and all of its recommendations and does not cover all BMS products, including CF 0-6 months and growing-up milks. As a manufacturer of CF, the company is also urged to develop policy commitments and associated management systems in relation to CF marketing intended for children 6-36 months of age in alignment with the recommendations set out in the guidance related to WHA resolution 69.9.

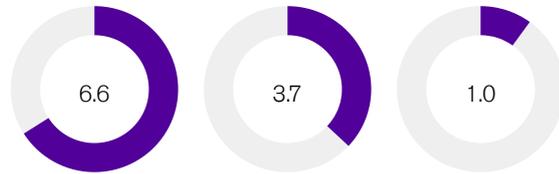
# Category Analysis

## Governance



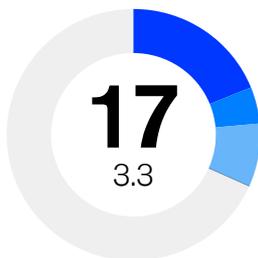
- A1 Nutrition strategy
- A2 Nutrition management
- A3 Reporting quality

Commitment Performance Disclosure



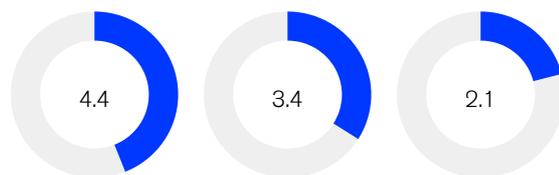
The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

## Products



- B1 Product Profile
- B2 Product formulation
- B3 Defining healthy products

Commitment Performance Disclosure

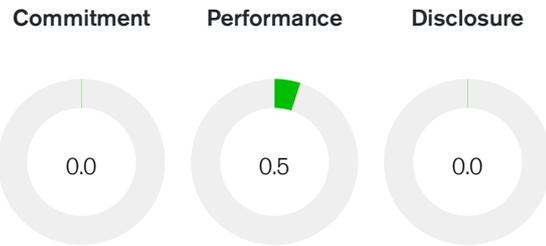


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## Accessibility

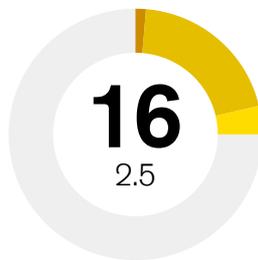


- C1 Product pricing
- C2 Product distribution

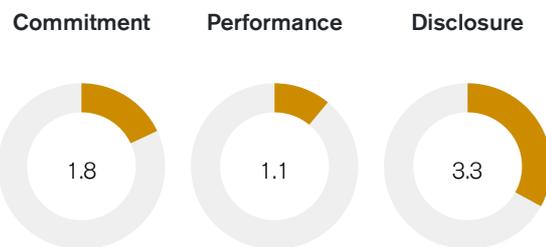


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## Marketing

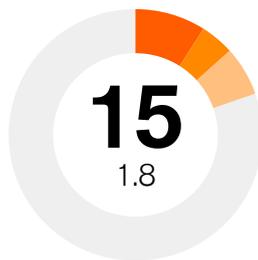


- D1 Marketing policy
- D2 Marketing to children
- D3 Auditing and compliance

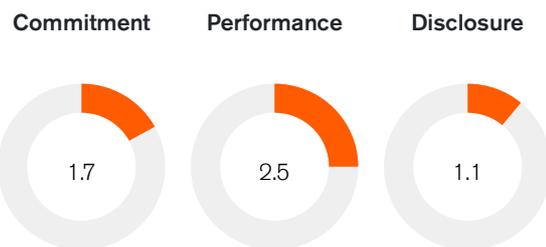


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## Lifestyles

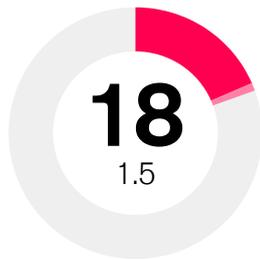


- E1 Employee health
- E2 Breastfeeding support
- E3 Consumer health



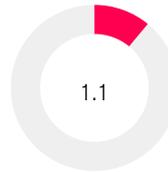
The big circle on the left represents the company result for this Index category, showing the rank out of 25 and the score below it. The smaller circles above indicate company's scores on the three types of indicators.

## Labeling

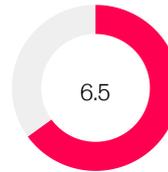


- F1 Product labeling
- F2 Claims

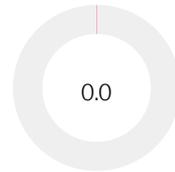
### Commitment



### Performance

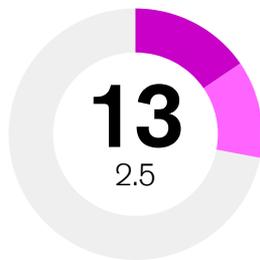


### Disclosure



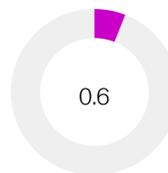
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## Engagement

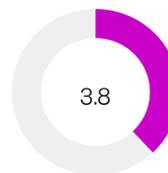


- G1 Influencing policymakers
- G2 Stakeholder engagement

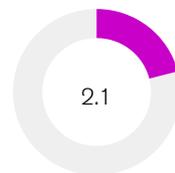
### Commitment



### Performance



### Disclosure



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# Detailed Product Profile Results <sup>1</sup> <sup>4</sup>

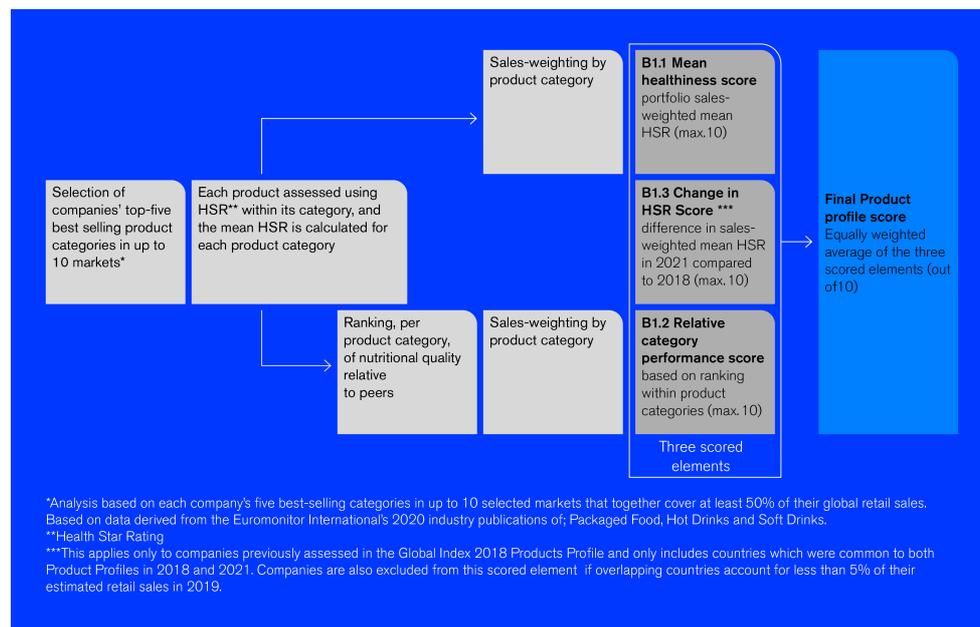


20

Rank 20 / Score 3.3

The Product Profile is an independent assessment of the nutritional quality of companies' product portfolios. For this purpose, ATNI uses the Health Star Rating (HSR) model, which rates foods from 0.5 to 5.0 based on their nutritional quality. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthy. This assessment is undertaken in partnership with The George Institute for Global Health (TGI), with additional data input from Innova Market Insights.

The methodology for the Global Index 2021 Product Profile has been revised and now includes three scored elements. The overall Product Profile score reflects: B1.1, the mean healthiness of a company's product portfolio; B1.2, the relative healthiness within product categories compared to peers; and B1.3, changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile. The steps taken to calculate the final Product Profile scores are visualized in Box 1. The next section further explains each of these three elements.



Kraft Heinz has been assessed for the second time in the Product Profile. In the previous assessment, nine of the company's markets were selected, and a total of 2,177 products analyzed – accounting for approximately 65-70% global retail sales in 2017, excluding baby foods and plain coffee. In this Index, a total of 3,820 products have been analyzed across 9 of the company's major markets. Products from the top five best-selling categories within each market are included. In 2019, these products accounted for 70-75% of the company's global retail sales, excluding baby foods, plain tea and coffee.

Canada is a new country included in this iteration. South Africa was included in the 2018 but has been omitted this time. In 2018, a total of 10 product categories were covered by the assessment, compared to 11 categories in 2021. 'Concentrates' is a new category assessed in 2021 for Kraft Heinz. Instead of the 'Spreads' category in 2018, the 'Sweet Spreads' category has been assessed in 2021.

In this Product Profile assessment, Kraft Heinz scores 5.4 out of 10 (B1.1) in the mean healthiness element, 4.6 out of 10 (B1.2) for the relative healthiness of its products within categories compared to peers, and 0 out of 10 (B1.3) for changes in nutritional quality (mean HSR) over time. This results in Kraft Heinz obtaining an overall score of 3.3 out of 10, ranking 20 out of 25 in the Product Profile.

## B1.1 Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	9 Countries included	Range of global sales included <sup>5</sup>	Healthy products (HSR)				Products suitable to market to children (WHO regional models) - UNSCORED		
			No. products assessed	% products healthy (≥3.5 stars)	% retail sales healthy 2019 (≥3.5 stars) – assessed countries only	% estimated global retail sales healthy 2019 (≥3.5 stars) <sup>6</sup>	No. products assessed	% products suitable	% sales from suitable
2.7	Australia, Canada, China, Hong Kong, India, Mexico, New Zealand, UK, USA	70-75%	3820	41%	36%	39%	3897	11%	3%

▪ A total of 3,820 products manufactured by Nestlé, sold in nine countries, covering 11 product categories, were included in this Product Profile (baby foods, plain tea and coffee were not assessed). The company's sales-weighted mean HSR is 2.7 out of 5. ATNI turns this value into a score between 0 and 10, resulting in a mean healthiness score of 5.4 out of 10 for Kraft Heinz. The company ranks 11 out of 25 companies in this first scored element (B1.1).

▪ Overall, 41% of distinct products assessed were found to meet the HSR healthy threshold (HSR ≥3.5). Together, these products accounted for an estimated 36% of Kraft Heinz retail sales of packaged food and beverages 2019 in the selected markets (excluding baby food and plain coffee). Assuming the products and markets included in the assessment are representative of the company's overall global sales, ATNI estimates the company derived approximately 39% of its global retail sales from healthy products in 2019.

WHO nutrient profiling models (unscored): Only 11% of products assessed were found to be of sufficient nutritional quality to market to children, according to the World Health Organization (WHO) regional nutrient profiling models. These products were estimated to generate 3% of the company's sales in 2019. More information on this part of the assessment can be found in the Marketing section (Category D) of the Index.

## B1.2. Product Category Results

	No. products analyzed	% products healthy (HSR >= 3.5)	Company mean HSR	Mean HSR for all companies selling this product category	Company performance (rank in mean HSR compared to peers selling products in the same category)
Concentrates	60	0%	1.1	1.2	5th out of 7
Baked Goods	23	57%	2.6	2	4th out of 9
Dairy	621	34%	2.7	2.9	13th out of 18
Sauces, Dressings and Condiments	1330	15%	2.2	2.5	8th out of 11
Juice	56	66%	3.6	3.2	2nd out of 5
Ready Meals	762	49%	2.8	3	6th out of 9
Sweet Spreads	54	30%	2.5	2.2	2nd out of 5
Processed Meat and Seafood	179	46%	2.5	3.1	5th out of 8
Processed Fruit and Vegetables	311	99%	4.2	4.1	2nd out of 4
Soup	176	93%	3.6	2.5	1st out of 8
Savoury Snacks	248	58%	3.5	2.2	1st out of 8

▪ For The Kraft Heinz, 'Processed Fruit and Vegetables' is the company's best performing category, receiving a score of 4.2 from a total of 311 products analyzed, according to the HSR algorithm. The next best performing categories were 'Juice' and 'Soup', whereby 56 and 176 products were analyzed, respectively. Concentrates (1.1) had the lowest mean HSR of all product categories included for Kraft Heinz.

▪ For 6 categories assessed, Kraft Heinz products perform better than the mean HSR of companies selling products in the same categories. The company performs best compared to peers in the 'Soup' and 'Savoury Snacks' product categories;

▪ Kraft Heinz scores 4.6 out of 10 in this second scored element (B1.2) and ranks 20 out of 25 companies. This is based on its ranking compared to peers within the 16 categories, using the scoring system set out in ATNI's methodology.

## B1.3. Change in mean HSR

	No. of products analyzed in 2018	No. of products analyzed in 2021	Sales weighted mean HSR 2018	Sales weighted mean HSR 2021
Australia	325	340	3	3.5
China	18	37	1.1	1.1
Hong Kong	39	77	2.1	2.4
India	3	6	2	4.2
Mexico	32	122	2.3	2.3
New Zealand	709	573	3.4	3.4
UK	284	195	3.4	3.3
USA	732	1859	2.8	2.7
<b>TOTAL</b>	<b>2142</b>	<b>3209</b>	<b>2.8</b>	<b>2.7</b>

▪ Among the 18 companies for which this third scored element was applicable, Kraft Heinz showed a slight decrease in mean HSR between the 2018 and 2021 Product Profiles (mean HSR=2.8 to 2.7). The change in HSR score only takes into account the eight countries included in both 2018 and 2021 assessments. The decrease observed in mean HSR between 2018 and 2021 was not driven greatly by changes in category sales, with relatively consistent proportions of category sales existing between 2018 and 2021. Decreases in the sales-weighted mean HSRs for 'Processed Meat and Seafood' and 'Ready Meals' for Kraft Heinz USA (the largest market, >60%) appear to be the main drivers of the overall change.

▪ For all countries combined, Kraft Heinz achieves a decrease of 0.1 (mean HSR=2.8 to 2.7) in mean HSR between 2018 and 2021 resulting in a score of 0 out of 10 (B1.3) on this element using the scoring system set out in ATNI's methodology.

**Full Product Profile report:** [https://new-l40rlzsq.accesstonutrition.org/app/uploads/2021/06/GI\\_Global-Index\\_TGI-product-profile\\_2021-2-1.pdf](https://new-l40rlzsq.accesstonutrition.org/app/uploads/2021/06/GI_Global-Index_TGI-product-profile_2021-2-1.pdf)

# Breast-milk Substitutes / Complementary Food Marketing



3

Rank 3 / Score 38%

Rank	BMS Marketing	Adjustment to Global Index Score <sup>1</sup> <sup>8</sup>	BMS 1	BMS 2	Level of compliance in country studies	
		Max. of -1.5			Philippines	Mexico
3	38%	-0.93	11%	66%	NA	High (66%)

- KraftHeinz is one of the six Index companies included in the BMS/CF Marketing Index. Its score is based on two assessments: BMS/CF 1 which assessed the company's policy commitments, management systems and disclosure relating to the marketing of its BMS and CF 6-36 products, and BMS/CF 2 which assessed its marketing practices in Mexico during 2020. Its BMS/CF 2 score is solely based on the study in Mexico as the Philippines is not an official market for its BMS and CF products. The BMS/CF Marketing Index score is used to generate a proportionate adjustment to the final Global Index score.
- KraftHeinz increased its ranking to third place in the BMS/CF Marketing Index with a level of compliance with ATNI's updated methodology (including WHA 69.9 and a CF module) of 38% from 0% in 2018.
- For the first time, KraftHeinz shared its BMS Marketing Charter with ATNI, which is welcomed, though it has substantial gaps compared to The Code and does not cover its CF 6-36 products, which make up the majority of its sales. As with policy commitments, previously KraftHeinz did not publish, or share any evidence of, management systems to implement its policy commitments. However, it provided some evidence for the 2021 assessment related to implementation and monitoring of BMS policy commitments (Article 11), but not any other article of The Code. KraftHeinz did not publish any information related to its lobbying commitments and activities for which it therefore could not be scored on. It also did not score on disclosure as it had not published its Charter by the time the research had been completed, nor any other relevant information. With regards to the CF module, KraftHeinz scores 2% as the only relevant commitment found was on formulating CF products for 6-36-month-olds according to national, regional and global dietary guidelines, partly meeting Recommendation 3 of the guidance associated with WHA Resolution 69.9. KraftHeinz applies its BMS marketing

policy to infant formulas and follow-on formulas globally. Its overall score on BMS/CF 1 is therefore 11%.

- ATNI welcomes KraftHeinz's active participation during the research process for the 2021 assessment however to improve its score, the company needs to publish and disclose more information relevant to its BMS and CF marketing. KraftHeinz's BMS Marketing Charter has substantial gaps in alignment with The Code and therefore the company is encouraged to incorporate its recommendations in full. Additionally, KraftHeinz should develop commitments in relation to the marketing of its CF 6-36 products which make up the majority of the company's baby food segment.
- In the study of marketing practices in Mexico, KraftHeinz achieved a level of compliance of 66%, being rated as having a high level of compliance with The Code in Mexico, an improvement in its BMS/CF 2 score since 2018.
- To bring its marketing practices into line with The Code, it is important that KraftHeinz has commitments and procedures in place relating to CF 6-36 as all five findings were attributed to non-compliant CF product labels which were missing the required messaging set out in Recommendation 4 of the guidance associated with WHA 69.9 on the importance of continued breastfeeding for up to two years or beyond. Recommendation 4 requirements need to be applied in all forms of promotion, including advertisement, online information and package labels.

**BMS/CF Chapter Global Index 2021:** <https://new-140rlzsq.accesstonutrition.org/index/global-index-2021/bms-chapter-global-index-2021/>

# Disclaimer Global Index 2021

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## Footnotes

1. The overall Product Profile score reflects: B1.1 the mean healthiness of a company's product portfolio; B1.2 the relative healthiness within product categories compared to peers, and; B1.3 changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile.
2. In the Global Index 2018, the Product Profile Assessment was conducted as a separate assessment. The results were based on scores generated by applying the Health Star Rating (HSR) nutrient profiling system, which analyzes the level of several positive nutrients (e.g. fruits, vegetables and fibers) and several negative nutrients (e.g. salt, sugar and saturated fat) in products.
3. 6 of the Global Index 2021 companies are also assessed under the Breast-Milk Substitute/Complementary Food Marketing Index which includes the nine largest companies by global revenues in the baby food segment. Companies are thus ranked and scored separately on the BMS/CF Marketing Index. This score is also used to generate a BMS/CF scoring adjustment of a maximum value of -1.5 which feeds into each company's final Global Index score.
4. The overall Product Profile score reflects: B1.1 the mean healthiness of a company's product portfolio; B1.2 the relative healthiness within product categories compared to peers, and; B1.3 changes in the nutritional quality of product portfolios compared to the Global Index 2018 Product Profile.
5. Retail sales data derived from Euromonitor International.
6. ATNI estimates this value by taking the proportion of healthy products within each category assessed and multiplying that figure by the global category retail sales. The values are then aggregated to generate an estimate of the overall global healthy sales (excluding baby foods, plain tea, and coffee, which are not included in the Product Profile).
7. Within-category ranks are calculated for all product categories in which two or more companies are active. Next, a performance percentage is calculated from the inverted rank (e.g. first out of 10: inverted rank  $10/10 = 100\%$  performance score; tenth out of 10: inverted rank  $1/10 = 10\%$  performance score). The 'Bottled Water- Pure' category receives a standard rating of five stars, according to the HSR algorithm for all companies.
8. The total possible adjustment made based on the BMS/CF 1 score is -0.75, 50% of the maximum possible adjustment of -1.5. The other -0.75 maximum adjustment is determined by the company's score on BMS/CF 2. The final combined score represents the level of compliance with the ATNI methodology; the adjustment is based on the level of non-compliance.