

US Index 2022

Unilever ¹

Product categories assessed

Ice Cream|Ready Meals|RTD
Tea|Soup|Sauces, Dressings and
Condiments

**Percentage of company US sales
covered by Product Profile assessment**
90-100%

Headquarters

London, UK (Global); New Jersey, U.S.

Number of US employees

7500

Type of ownership

Public

Sales revenue (range) of packaged foods and beverages

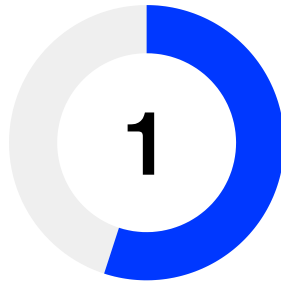
USD 5-10 Billion

US share in global packaged food and beverage sales

18-23%

Euromonitor International Limited [2021]

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Rank 1 / Score 5.5

Rank 2 (2018)



Product Profile ²

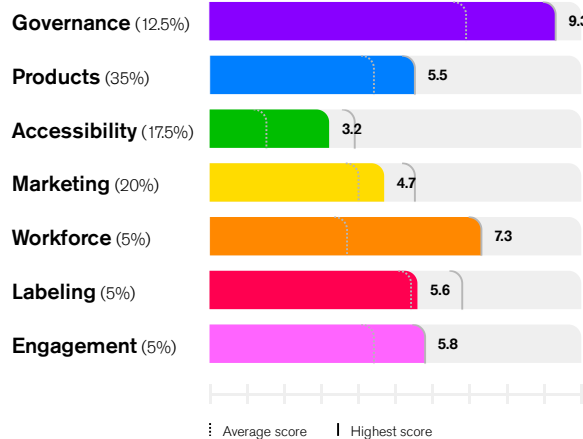
Rank 8 / HSR 2.1 ³

Rank 7 (2018) ⁴

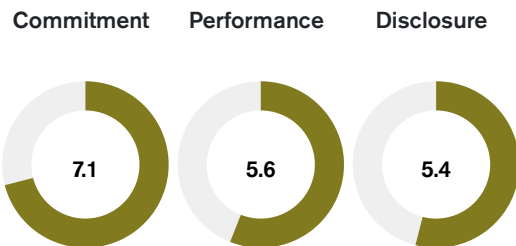
Important:

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. Therefore, in the case of limited or no engagement by such companies, this Index may not represent the full extent of their efforts.

Scoring Overview



(%) Figure in brackets is the weighting of the category
All category and criteria scores are out of 10



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.

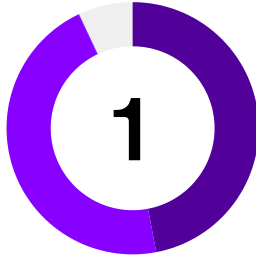
Categories

The US Index 2022 assesses companies' nutrition-related commitments and policies, practices and disclosure across seven categories. A product profiling exercise, assessing the healthiness of companies' product portfolios using the Health Star Rating model is also part of the Corporate Profile.



Governance

12.5% of overall score



Rank 1 / Score 9.3

Rank 2 (2018)

Highest score 9.3

Average score 6.9

A1 Nutrition strategy

A2 Nutrition management

Unilever is one of four companies that make nutrition and health part of their mission statement in addition to their core commercial strategies. In 2020, Unilever launched its new strategy – The Unilever Compass – which builds upon the Unilever Sustainable Living Plan (USLP) 2010-2020. The company's purpose is to “make sustainable living common place.” Under the ‘Improve people's health, confidence, and wellbeing’ pillar, the company has set six goals on positive nutrition, including to “double the number of products sold that deliver positive nutrition by 2025” and for “70% of our portfolio to meet World Health Organization (WHO)-aligned nutritional standards by 2022.” These goals are part of the company's ‘Future Foods’ strategy.

In July 2020, the company published a plan called ‘Transforming the world's food system for a more nutritious, more sustainable, and fairer future’, in which it outlines four ways the company is leading change. These include: 1) Nutritious foods and balanced diets; 2) Making plant-based choices available for all; 3) Less food waste; and 4) Food that is fair and doesn't cost the earth. On its US website, the company states: “As one of the biggest consumer goods companies in the world, with a large Foods & Refreshment portfolio, we're mindful of the huge impact we can make through our scale and reach. We aim to produce tasty, accessible, affordable, and nutritious products, and encourage people to make nutritious choices through transparent labelling and balanced portions.”

Also on its US website, Unilever has a dedicated section to report progress on its nutrition efforts, including US-specific progress on nutrition targets. In addition, in the section “Sustainability performance data” on its global website, Unilever publishes progress by country.

The company recognizes childhood obesity as one of the most serious public health concerns.

Accountability of Unilever's nutrition strategy lies with senior leadership, and it is one of four companies that link remuneration of senior leadership to nutrition objectives.

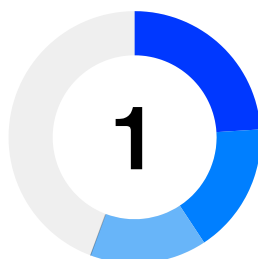
Areas of improvement

Unilever has a commitment in place to tackle childhood obesity in the US. However, it is also recommended to develop strategies to increase access to healthy foods relative to unhealthy products for communities that may face food and nutrition insecurity, or that may be at a higher-than-average risk of experiencing diet-related diseases.



Products

35% of overall score



Rank 1 / Score 5.5

Rank 1 (2018)

Highest score 5.5

Average score 4.4

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

▪ As part of its new Compass strategy and 'Future Foods' commitments, Unilever has pledged that 70% of its global portfolio will meet its highest nutritional standard (HNS) by 2022. The company obtains the highest score in this indicator, as it links its 2022 target to sales volumes measured in tons sold. Furthermore, Unilever externally verifies this metric. Furthermore, Unilever publishes progress against its 2022 goal on its global website, including progress by country. For its US market, 64% of Unilever's products met the HNS in 2021 (up from 59% in 2020). The company is encouraged to publish this information on its US-specific site.

▪ Unilever is in the process of reviewing its internal HNS, and has shared with ATNI evidence that all relevant categories now include added sugar benchmarks. Unilever has committed to doubling the sales of products that deliver against the company's own standards for 'positive nutrition' (when a product is considered to deliver a meaningful amount of positive nutrients or ingredients, such as fruits and vegetables) by 2025. Unilever publishes full details of its global 'Nutrition Standards,' which include its nutrient profiling model (HNS) and 'positive nutrition' criteria online.

▪ Unilever continues to report against sugar and sodium reduction targets. The company has the ambition to have 85% of its foods portfolio to help consumers reduce their salt intake to no more than 5g per day by 2022. According to Unilever, for the US market, 91% of its portfolio met the salt target in 2021 (up from 87% in 2020). The company shared with ATNI (under NDA) an internal evaluation of how selected products perform against the United States Food and Drug Administration's voluntary sodium reduction guidelines. Concerning sugar, Unilever reports that by 2021, 91% of its US portfolio met the global target to reach 95% of packaged ice cream to contain no more than 250 kcal per serving by 2025.

▪ While Unilever has indirect saturated fat and sugar reduction targets (benchmarks for these nutrients included as part of Unilever's HNS), as well as 'positive nutrition' targets, the company does not report on US-specific progress against these.

▪ Although the announcement was made after the cut-off date for this Index to accept new evidence and thus not scored, ATNI does commend Unilever for its announcement March 2022 to publish an annual assessment of its product portfolio against at least six different government-endorsed NPMs globally, and for 16 key markets (including the US), as along with its own HNS. The company is encouraged to publish these results on its global and US-specific website, and to adopt a US-specific target to increase sales of healthier products. When FDA releases its new definition of 'healthy', ATNI hopes all companies, including Unilever, can benchmark their internal nutrition criteria against these new standards.

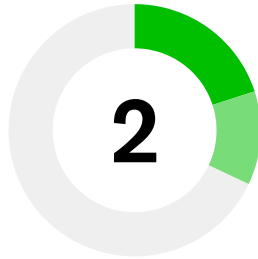
Areas of improvement

- Unilever's Nutrition Standards include its HNS and positive nutrition standards (PNS), and are applicable to its complete portfolio. While the HNS and PNS are composed of category-specific nutrient/ingredient thresholds, the two metrics are not combined to generate scores, enabling foods to be ranked on their overall healthiness. The company is encouraged to revise its Nutrition Standards to strengthen its commitment to increase sales from healthier products, and also to publish results in a peer-reviewed journal.
- ATNI's Product Profile outcome was that 19% of the company's US sales in 2021 were derived from products meeting the HSR 'healthy' threshold (3.5 stars or more out of 5). Unilever is encouraged to improve its product mix, and channel more marketing resources to increase sales from healthier products and product categories.
- Unilever is encouraged to improve transparency on how its (re)formulation strategy aims to address US-specific nutrition challenges, including performance against external benchmarks (e.g., FDA sodium targets). Unilever is encouraged to set a timebound sugar reduction target that is relevant and specific to its US portfolio. As part of its previous strategy (Unilever Sustainable Living Plan), in 2010 Unilever committed to removing 25% of sugar across all sweetened tea-based beverages by 2020. In the US, the company achieved a 20% reduction. As ready-to-drink tea (RTD) continues to represent a significant proportion of company's sales in the US, the company is encouraged to continue and strengthen its sugar reduction journey. Indeed, in 2021, the company announced a new global sugar reduction commitment to reach 80% of its global beverage portfolio to contain no more than 5 g per 100 ml of total sugar, by 2025. Reporting of US-specific compliance against this target is encouraged.



Accessibility

17.5% of overall score



Rank 2 / Score 3.2

Rank 6 (2018)

Highest score 3.9

Average score 1.5

- C1 Product pricing
- C2 Product distribution

- Unilever was the only company in this research found to explicitly commit to reaching low-income consumers, stating on its Knorr website: "Make Nutritious Food Accessible & Affordable: Knorr believes that wholesome, nutritious food should be accessible and affordable to all, but unfortunately, that is not a reality for everyone today in America." Moreover, the company provided evidence of how it tries to make this a reality, conducting analyses of appropriate price positioning and offering a variety of pack sizes that can reach low-income households, and designing 'Better for you' recipes for its rice, pasta, and sides dishes that meet its HNS criteria at affordable price points for low-income consumers.

- Unilever primarily seeks to address access to healthy foods in the US through philanthropic activities. For example, in partnership with The Food Trust, it provided mini-grants to small grocery store owners that sold nutritious food in United States Department of Agriculture (USDA)-identified 'food deserts' during the pandemic, and has supported stores in the Navajo Nations' healthy retail program. It is also a partner of Feeding America, to which it donates both funds and products.

- While it does not have a policy for ensuring responsible donations of products, Unilever was the only company to show evidence of keeping detailed records of its product donations. Between 70-80% of the products it donated were estimated to meet the HNS criteria.

Areas of improvement

- Unilever is encouraged to publicly report about its strategies in the US designed to increase the affordability of its Knorr products for low-income consumers. It is also recommended to set SMART (specific, measurable, achievable, relevant, and time-bound) targets in this regard.

- Unilever is encouraged to commit to and develop a commercial strategy to address the accessibility and distribution of its healthy and affordable products relative to less healthy and less affordable varieties. The company could also consider setting targets to drive accountability on this topic.

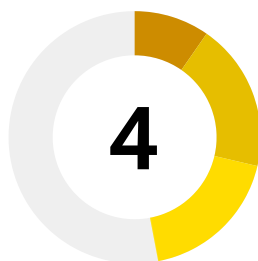
- Unilever could work with retailers and distributors to ensure its healthy products are offered at an affordable price and are distributed in food-insecure neighborhoods.

- While the company demonstrated that it primarily donates products that meet its internal HNS nutrition criteria, Unilever is encouraged to adopt a policy for responsible food donations to formalize this practice. Such a policy should limit the donations of products that are not part of a healthy diet, in order to prevent its philanthropic efforts inadvertently contributing to obesity and other diet-related non-communicable diseases (NCDs). For example, it could commit to responsible donation guidelines such as the Healthy Eating Research (HER) Nutrition Guidelines for relevant product categories.



Marketing

20% of overall score



Rank 4 / Score 4.7

Rank 5 (2018)

Highest score 5.5

Average score 4

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

- Unilever commits not to market products to children under the age of 13 at all. According to its updated Markets to Kids Principles, Unilever commits to stop marketing food and beverages to children under the age of 16, effective from 31st December 2022.
- Unilever has a detailed marketing policy for all audiences, including a specific policy section for children, which includes information on the forms of marketing it covers, and provides an extensive list of commitments regarding making a fair representation of their products. Furthermore, it has a well-structured response mechanism to ensure corrective measures are taken regarding any non-compliance with its marketing policy.
- The marketing policy for children is specific on marketing strategies in schools, both primary and secondary, and also commits to only market or advertise 'healthy' products in other places where children gather.

Areas of improvement

- Unilever undergoes Children's Food and Beverage Advertising Initiative (CFBAI) auditing and is encouraged to make the marketing compliance levels public. No information on auditing the compliance of marketing for the general audience was found. It is therefore recommended they ensure annual independent external auditing of the company's compliance with its general marketing policy applicable to the US, covering all media specified in the policy.
- Unilever is encouraged to commit to increasing the proportion of marketing spending on healthy products or healthier product varieties relative to overall marketing spending or spending on the marketing of less healthy product varieties. They are also encouraged to publish a commentary outlining the changes to the company's marketing spending in support of healthier eating.
- Unilever is advised to commit to or demonstrate that its non-commercial US programs relating to nutrition education exclude product- or brand- level branding in all programs.



Workforce

5% of overall score



Rank 1 / Score 7.3

Rank 2 (2018)

Highest score 7.3

Average score 3.7

E1 Employee health

E2 Breastfeeding support

- Unilever's Health Improvement Program and Lamplighter program both have a focus on nutrition, and include measurable and verifiable expected outcomes.
- Unilever commits to work with the Workforce Nutrition Alliance to "improve the health and wellbeing of Unilever employees focusing on nutrition behavior changes, physical activity and mental health, and other aspects of a healthy lifestyle."
- Unilever's workforce nutrition programs are available to all employees and offer healthy food at work, nutrition education, and nutrition-focused health checks.
- Unilever is one of two companies assessed in this Index to provide information on the health impact of its nutrition programs in the US.
- Unilever formally commits to offering paid maternity leave of 16 weeks and paid parental leave of eight weeks for non-birth giving parents.
- Unilever has a Global Maternal Wellbeing standard, which is publicly available and lays out the company policy on supporting maternal health and breastfeeding mothers at work. It applies equally in all facilities. Lactation facilities are available at all sites with more than 50 employees.

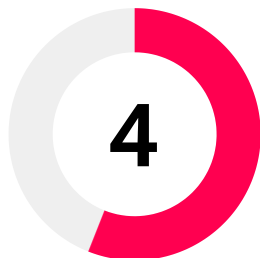
Areas of improvement

- Unilever is encouraged to make efforts to increase the percentage of employees that participate in its workforce nutrition programs. Unilever could also consider making these programs available to all family members.
- Unilever is encouraged to evaluate the health impact of its workforce nutrition program(s) in the US, regulated by a third-party independent evaluator. The company is further encouraged to disclose quantitative and qualitative information of the outcomes of the program.
- Unilever could commit to improve the health and nutrition of groups across the food value chains it is involved in, that are not directly employed by the company (supply chain partners in the US), through programs focused on nutrition.
- Unilever is encouraged to extend its current paid parental leave policies to ideally six months or more.



Labeling

5% of overall score



Rank 4 / Score 5.6

Rank 1 (2018)

Highest score 6.8

Average score 5.4

F1 Product labeling

- Unilever uses the Facts up Front (FuF) labeling icons to display front-of-pack (FOP) information, which shows the calories, saturated fat, sodium, and total sugar contained in each serving of a food or beverage product. This FOP label is displayed on all of Unilever's US food and beverage products.
- All of Unilever's US food and beverage products' nutritional information is displayed online through SmartLabel.

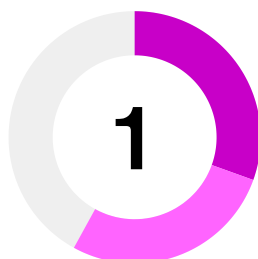
Areas of improvement

- Unilever is advised to adopt an interpretive FOP labeling system and apply this to all products in its portfolio. Information on the type of FOP labeling used by the company should be disclosed publicly.
- Unilever is encouraged to use an externally recognized NPM to underpin FOP labeling information in the US. Unilever currently uses the FuF labeling system, which pulls nutrient information from the Nutrition Facts Panel. However, this does not tell consumers what products the company considers healthier and the criteria used for that purpose.
- Unilever could provide the percentage of wholegrain relative to all grain or refined grains on all relevant products, to assist consumers in making informed decisions on the healthiness of products. Currently, the company displays wholegrain first in the ingredients list – but for consumers to easily decipher the ratio of wholegrain to refined grains in a product, either the quantity of both grains or the percentage of wholegrains is needed on the product label.
- Unilever displays the amount of vegetables on pack for some products. The company is encouraged to commit to providing fruit and vegetable content information on all relevant products.
- Unilever is encouraged to use a healthy filter aligned with FOP information, or a filter that allows a selection of at least three nutrients on direct-to-consumer channels, such as Ice Cream Now and Food Service Direct. These filters could be 'high in fiber' or 'low in sugar/calories'.



Engagement

5% of overall score



Rank 1 / Score 5.8

Rank 4 (2018)

Highest score 5.8

Average score 4.4

G1 Influencing policymakers

G2 Stakeholder engagement

- Unilever's Board is responsible for the company's Code of Business Principles, which covers engagement with government and regulators, political activities, and donations. The President of 'Food & Refreshment' is responsible for the company's lobbying activities and positions, and reports to the CEO. The company has an internal policy governing its engagement with trade associations.
- Unilever is a member of the Sustainable Food Policy Alliance (SFPA), which engages with the US government on reducing dietary sodium and added sugar in consumers' diets, updating definitions of terms like 'healthy', and encouraging timely implementation of the new nutrition facts panel. SPFA also advocates for increased flexibilities in USDA food and nutrition programs to extend access to WIC, School Lunch and Breakfast Programs, and SNAP for food insecure families and children during the COVID-19 pandemic.
- Unilever discloses all trade associations in the US to which it pays \$10,000 or more in membership dues. In its Annual Report of Accounts, it also discloses the associations that members of its Unilever Leadership Executive team hold Board seats on.
- Unilever's policy prohibits political contributions to political parties or candidates, including via intermediary organizations. The company does not have a political action committee.
- Unilever demonstrates leadership in terms of the extent to which it discloses its lobbying positions on important nutrition-related policies, publishing a range of 'advocacy and policy asks' covering fiscal measures, FOP labelling, and marketing, among others. Moreover, the company provides further detail on the conditions under which it would support government regulation to limit sugar and FOP labeling requirements in its 'Position on Sugar' and 'Position on Nutrition Labelling' documents respectively.
- Unilever reports that it engaged external nutrition experts on its new HNSNPM and its product development, several of which were US-based, and shared evidence of this how input was used. It is also a member of the Portion Balance Coalition and Tufts University Food and Nutrition Innovation Council in the US.
- Unilever's Knorr brand supports several non-commercial nutrition education programs designed and implemented by external organizations with relevant expertise. These include Boys & Girls Clubs of America, which teaches youths about cooking healthy and affordable meals, and FoodRight, a Milwaukee-based nonprofit which works with schools and community organizations to offer gardening and culinary nutrition education to youths.

Areas of improvement

- Unilever is encouraged to assign to its Board direct oversight of its public policy positions. It is also advised to undertake audits of the company's lobbying activities, disclosure, and compliance with its lobbying policies.
- Unilever is strongly encouraged to actively support (or commit to not lobby against) key WHO-endorsed public policy measures to address obesity and diet-related NCDs in the US where proposals arise, whether at federal, state, or local level, . Publishing links to specific documents used in government engagements related to nutrition is also encouraged.
- Unilever is also recommended to be more explicit on its website about the role of the SFPA as one of the company's key channels for nutrition-related lobbying in the US.
- For the trade associations it discloses, Unilever is encouraged to disclose the precise amount of its membership dues that are used for lobbying purposes. It is also recommended to disclose the Board seats its Unilever Leadership Executive (ULE) holds in the same space as its trade association disclosure.
- While it publishes a link to its Lobbying Disclosure Act reports on its website, Unilever could also be more transparent in its own domain about its lobbying expenditures and activities, including publishing the names of its lobbyists/lobbying firms and what state jurisdictions it is actively lobbying in.
- While Unilever demonstrates stakeholder engagement at a global-level, it should ensure it engages directly with a wider range of US-based stakeholders specifically regarding its nutrition strategies and activities in the US. These could include civil society organizations, academic institutions, and scientific bodies with recognized expertise in nutrition and public health. Unilever is strongly encouraged to improve its transparency regarding the identities of experts it consults in the US, as well as the degree of financial compensation provided for these engagements.
- Unilever is encouraged to improve its public reporting of the topics and outcomes of discussions during stakeholder engagements, which aspects of the company's nutrition-related activities are being discussed, and how it was used to change its practices or plans. Per the AccountAbility 1000 Stakeholder Engagement Standard, improving transparency in this regard enables other stakeholders to better understand and scrutinize the quality of the company's stakeholder engagement, and perspectives are shaping the company's nutrition-related activities.

Product Profile^{1 5}



8

Rank 8/11 / Score 2.1/5

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. The underlying nutrient profile model assesses nutrients of concern (sodium, total sugar, saturated fat, and overall energy) and positive food components/nutrients (fruit and vegetable content, protein, fiber, and, in some cases, calcium) to score products on the basis of nutritional composition per 100g or 100mL. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthier. Product Profile results account for 20% of the total Index score.

Portfolio-level Results

Average HSR (out of 5 stars) (sales-weighted)	Products meeting the 'healthy' threshold (HSR of (3.5 stars or more)			Range of total 2021 US sales covered ⁶
	Total no. products assessed	% of distinct healthier products	% sales from healthier products*	
2.1	791	17%	19%	90-100%

ATNI estimates this value by taking the proportion of 'healthy' products within each category assessed and multiplying that figure by the corresponding category US retail sales-values in 2021. The values are then aggregated to generate an estimate of the overall US healthy sales.

▪ Unilever's average sales-weighted HSR is 2.1 (stars) out of 5 (2.1 unweighted), ranking eight out of the 11 companies assessed in the Product Profile. A total of 791 products across the company's five best-selling product categories were assessed using the HSR system. Unilever's plain tea products were not included in this analysis.▪ 17% of distinct products analyzed for Unilever met the 'healthy' threshold (3.5 stars or more in the HSR). When taking category sales values into account, the company was estimated to derive 19% of its 2021 US retail sales from healthier products. These results are largely influenced by the fact that the company derives majority of its US sales from the Ice Cream category.

Mean Health Star Rating by category for Unilever

	No. of products assessed	Mean HSR
Ice Cream	471	2
Ready Meals	141	3.7
RTD Tea	68	2.1
Sauces, Dressings and Condiments	96	1.8
Soup	15	2.2

▪ Among categories assessed, Unilever's products in the Ready Meals category (Knorr brand) had the highest mean HSR (3.7 out of 5), followed by the Soup category (2.2 out of 5). A total of 141 products from the Ready Meals category were analyzed, and 60 (or 43%) met the 'healthy' threshold. A total of 15 Soup products were analyzed, with seven (47%) meeting the 'healthy' threshold. A total of 471 Ice Cream products were analyzed, with 22 (5%) meeting the 'healthy' threshold.

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Footnotes

1. The Access to Nutrition Foundation (ATNF) is an international not-for-profit organization based in the Netherlands dedicated to addressing global nutrition challenges worldwide. ATNF provides companies with a tool to benchmark performance on nutrition against others in their sector, and provides stakeholders with impartial objective, consistent, in-depth information on companies' contributions to improving nutrition.
2. The Product Profile corresponds to criterion B1, assessing the nutritional quality of companies' portfolios, relative product quality within categories compared to peers and changes in portfolio healthiness over time.
3. The current Product Profile score accounts for 20% of the total Index score. It corresponds to criterion B1 of the Index.
4. In the US 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.
5. 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. The underlying nutrient profile model assesses nutrients of concern (sodium, total sugar, saturated fat, and overall energy) and positive food components/ nutrients (fruit and vegetable content, protein, fiber, and, in some cases, calcium) to score products on the basis of nutritional composition per 100g or 100mL. ATNI uses the threshold of 3.5 stars or more to classify products as generally healthier. Product Profile results account for 20% of the total Index score.
6. Retail sales data derived from Euromonitor International.

