

Mars, Inc.

Product categories assessed

Confectionery|Ice Cream|Rice, Pasta and Noodles|Savoury Snacks|Sweet Biscuits, Snack Bars and Fruit Snacks

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

Headquarters
McLean, Virginia, U.S.

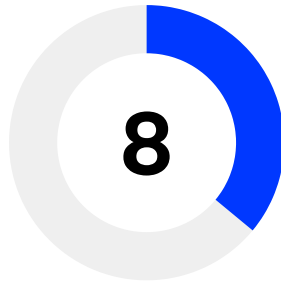
Number of US employees
-

Type of ownership
Private

Sales revenue (range) of packaged foods and beverages
USD 7–12 Billion

US share in global packaged food and beverage sales
35-40%

Euromonitor International Limited [2021]
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Rank 8 / Score 3.6
Rank 4 (2018)

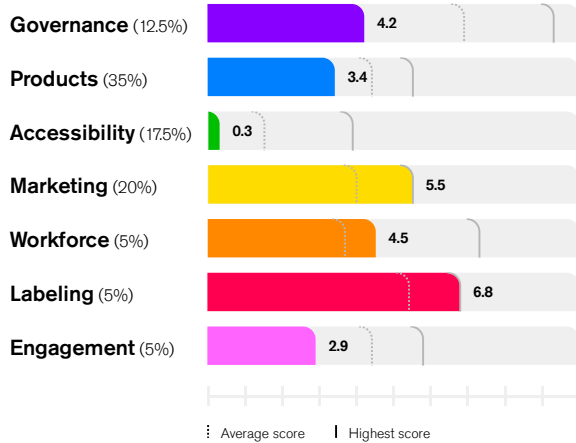


Product Profile ¹
Rank 11 / HSR 1.3 ²
Rank 10 (2018) ³

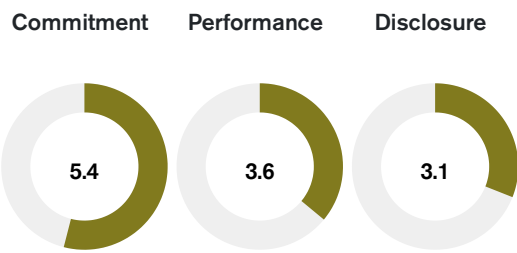
Important:

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.

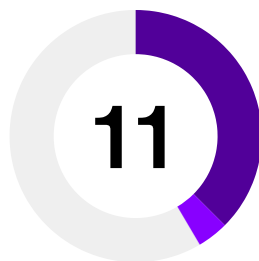
Categories

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 11 / Score 4.2

Rank 7 (2018)

Highest score 9.3

Average score 6.9

A1 Nutrition strategy

A2 Nutrition management

- Mars' sustainability strategy is centered on its 'Sustainable in a Generation Plan', which details the company's strategic commitments and is organized across three pillars: Healthy planet, thriving people, and nourishing wellbeing. The nourishing wellbeing pillar includes commitments to make the company's products healthier.
- This commitment applies to Mars Food and comprises several approaches, including nutrition transparency, reducing sodium and added sugar, and adding vegetables, wholegrains, and legumes. Mars Wrigley also has targets in place to reduce calories, trans fats, and sugars, while creating smaller portion-size offerings. The company tracks progress against these goals using the 'Mars Food Nutrition Criteria', which includes targets for calories, added sugar, salt, and fat content in all the company's products.
- Formal accountability for implementing the company's nutrition strategy lies with the President of each of the three human food segments (Mars Food, Mars Wrigley, and Mars Edge). This person holds responsibility for their respective segment's strategy, which is ultimately subject to the Board's approval.

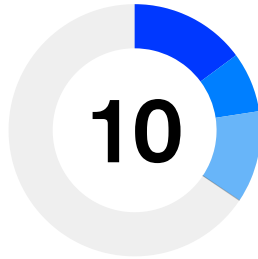
Areas of improvement

- The company is encouraged to commit to increasing access to healthy foods for priority populations as part of its main commercial activities.
- The company is recommended to link executive remuneration to nutrition objectives and disclose these arrangements publicly.
- Mars is recommended to further improve its nutrition governance and management systems by performing standard internal audits and management reviews of its nutrition strategy.



Products

35% of overall score



Rank 10 / Score 3.4

Rank 4 (2018)

Highest score 5.5

Average score 4.4

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

- Mars has committed to continue improving the nutritional quality of its products by reducing levels of sodium, added sugar, saturated fat, and calories in its food segment, and improving the content of whole grains, vegetables, legumes, and fiber. To strengthen its (re)formulation strategy, the company released the third edition of its nutrient profiling model (NPM) – Mars Food Nutrition Criteria – in 2021. The company commits to aim to have 95% of its global food portfolio meet these standards by 2025, and discloses progress over time. Mars shows industry best practice by providing a benchmarking of its sodium limits against external standards (UK's Public Health England target 2024 and World Health Organization's (WHO) global sodium benchmarks).
- In addition, to meet its ambition to provide 5.5 billion healthy meals to families globally by 2025, the company plans to provide four billion servings of vegetables, increase fiber servings in its products by 30%, and reduce sodium in its portfolio by 5% by 2025. The company is encouraged to report US-specific progress over time.

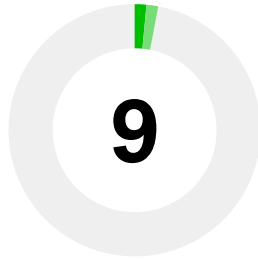
Areas of improvement

- While the company has released a new edition of its NPM, the standards are only applicable to its food segment. Mars continues to derive most of its US sales from Mars Wrigley (chocolate, candies, and gums products); therefore, the company is encouraged to further connect its overall nutrition and wellbeing strategies and to set ambitious sugar/calorie reduction targets for its confectionery products. Indeed, the company's confectionery segment has committed to offering treats and snacks which contain no more than 250 calories per serving, and has defined the ambition for half of its global portfolio to provide no more than 200 calories per single serving by 2023. No US-specific reporting could be found, although there is evidence the company is collaborating with Partnerships for Healthier America to track progress over time.
- The company has committed to 95% of its global food portfolio meeting its nutrition standards (Mars Food Nutrition Criteria) by 2025. However, no US-specific targets to increase sales of its 'healthy' foods was defined. To improve performance and enhance transparency, ATNI recommends the company adopts a time-bound sales target covering its entire Mars Food and Mars Wrigley portfolios.
- Mars is encouraged to provide more information about the products it sells in schools (Smart Snacks in School program). ATNI recommends that Mars publicly commits to sell products through retail and other outlets that have the same 'look and feel' as products sold under the Smart Snacks in School regulation, but only when they meet the same nutritional standards. Currently, the only relevant information is included in Mars' marketing policy, whereby the company commits not to place vending machines offering its products in primary schools or in locations where the majority of users are under 13.



Accessibility

17.5% of overall score



Rank 9 / Score 0.3

Rank 7 (2018)

Highest score 3.9

Average score 1.5

C1 Product pricing

C2 Product distribution

- Mars demonstrates awareness of the importance of ensuring the affordability of its healthy products, stating that it is committed to make its products healthier without compromising affordability. Meanwhile, its Mars Food segment aims to provide consumers “with healthy, easy, [and] affordable” meals. However, beyond these statements, Mars showed no evidence of a strategy, targets, or practical examples of making its healthy products more affordable in the US.
- Accessibility of healthy food is featured as a core commitment of Mars Food’s ‘Open Access to Better Food’ strategy, which states that, by 2025, it will “build strategic partnerships to tackle hunger and provide access to healthy food, which gives more people the opportunity to share a meal.” The commitment is not specific to the US, however, and only appears to relate to one of Mars’ food-related business segments, Mars Food. Moreover, as with affordability, no evidence of a commercial strategy, targets, or practical examples of making its healthy products more accessible in the US was provided by the company.
- Mars Food makes philanthropic food donations to hunger relief organizations. For example, in 2021, it donated \$3.1 million-worth of Ben’s Original™ products to Feeding America and CARE. However, details of the healthiness of its product donations are not provided, and the company does not have a formal policy to ensure it donates predominantly healthy products.

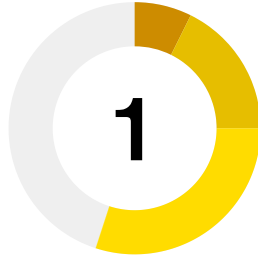
Areas of improvement

- Given that Mars recognizes the importance of affordability of healthy products, it is recommended to develop a strategy to make this a reality, to encourage a shift in consumption toward healthier options. The company could start by tracking the relative prices (per serving) of its healthy products vs its general portfolio, and developing targets to improve the price differential between them. Conducting analysis into how products can be priced appropriately for low-income consumers specifically is also encouraged.
- Mars is encouraged to develop a commercial strategy to address the accessibility and distribution of its healthy and affordable products. The company could also consider setting targets to drive accountability on this topic.
- Mars could also work with retailers and distributors to ensure its healthy products are offered at an affordable point-of-sale price and are distributed in food-insecure neighborhoods.
- Since the company makes sizeable product donations to hunger relief organizations in the US, Mars is encouraged to adopt a policy for responsible food donations which prioritizes nutritious products and limits the donations of unhealthy products, to prevent its philanthropic efforts from 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. In addition, it is recommended to track the nutritional profile of its product donations for philanthropic programs.



Marketing

20% of overall score



Rank 1 / Score 5.5

Rank 1 (2018)

Highest score 5.5

Average score 4

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

- Mars has an extensive auditing system in place, and it is the only company assessed where an external auditing organization annually examines marketing compliance for the general audience and children as a special group. This audit assesses the commitments made in the marketing policy for all audiences and children, and both give extensive information on the forms of marketing it entails and a vast list of commitments regarding fair representation of their products. It also has a robust and well-structured process in place to take corrective measures when non-compliances are detected.
- Mars is one of the two companies (together with General Mills) that has an extensive mechanism in place to ensure its digital marketing does not reach younger age groups. Mars Global Marketing Code 2022 mentions that the company partners with social media platforms and services that offer age screening – and, if such mechanisms are not present, Mars seeks parental controls or notices to uphold this commitment.
- The company commits not to market products to children under the age of 13.

Areas of improvement

- Mars is encouraged to commit to increasing the proportion of marketing spending on healthy products relative to overall marketing spending, and publish a commentary outlining the changes to the company's marketing spending in support of healthier eating.
- Where Mars does include commitments regarding marketing to children in schools, both primary and secondary, the marketing policy does not include other places where children gather (e.g., YMCA, boys/girls clubs, zoos, etc.) The company could consider including such places in their policy.
- Where Mars does disclose auditing results, these could be more specific regarding the compliance for the different forms of marketing. It could also disclose results for its main markets on country level (including the US).
- Mars 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 5 / Score 4.5

Rank 4 (2018)

Highest score 7.3

Average score 3.7

- E1 Employee health
- E2 Breastfeeding support

- The Mars Be Well program includes a focus on nutrition, has measurable and specific outcomes, and is available to all employees.
- Mars formally commits to granting paid parental leave, and to providing private safe and hygienic rooms for mothers to breastfeed at work.

Areas of improvement

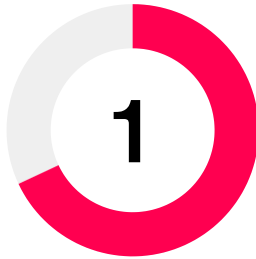
- For the Be Well program and other workforce nutrition programs run by Mars, the company should consider:
 - 1) A commitment to making the program available to all employees and all family members;
 - 2) Including healthy food at work and nutrition-focused health checks;
 - 3) Disclosing the percentage of employees that participate in the program.
- Mars 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.
- Mars 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 and abroad), through programs focused on nutrition.
- Mars is encouraged to publicly disclose its paid parental leave policy and extend its current policies to ideally six months or more.
- Mars could extend arrangements to support breastfeeding mothers by ensuring refrigerators are available to store breast milk at all locations, and by providing daily intermittent breaks for mothers to express milk.





Labeling

5% of overall score



Rank 1 / Score 6.8

Rank 5 (2018)

Highest score 6.8

Average score 5.4

F1 Product labeling

- Mars provides front-of-pack (FOP) information on the amount of calories, sodium, sugar, and fats per serving on 100% of product labels, with exemptions including “gum, mints, drops, medicated confectionery, herbs, spices and condiments.” Exempted foods are those with nutritional or dietary insignificance, or foods in small packs. The company confirmed that this commitment spans both Mars Food and Mars Wrigley.
- Mars displays online nutrition information for 96% of Mars Food products. Mars provided evidence of some Mars Wrigley’s products displaying online information, but the proportion is unclear.

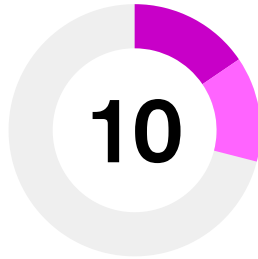
Areas of improvement

- Mars should publicly provide more clarity on the policies and practices that drive decisions for the Mars Wrigley brand of products. In some cases during engagement Mars provided this information, but not on the company website or in public reports.
- Mars is advised to adopt an interpretive FOP labeling system for all products and apply this to all products in its portfolio. Information on the type of FOP labeling used by the company should be disclosed publicly.
- Mars encouraged to use an externally recognized NPM to underpin FOP labeling information in the US.
- Mars 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. Some Mars products carry the Whole Grain Stamp.
- Mars is encouraged to commit to providing fruit and vegetable content information on all relevant products.
- It is recommended that Mars ensures 100% of its portfolio displays online nutrition information to ensure that, with growing online retail sales, consumers can easily access nutritional information.



Engagement

5% of overall score



Rank 10 / Score 2.9

Rank 1 (2018)

Highest score 5.8

Average score 4.4

G1 Influencing policymakers

G2 Stakeholder engagement

- Mars is a member of the Sustainable Food Policy Alliance (SFPA), which engages with the government on reducing dietary sodium and added sugar in consumers' diets; updating definitions of terms like 'healthy'; encouraging timely implementation of the new nutrition facts panel; and advocated for increased flexibilities in the United States Department of Agriculture 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.
- However, the company provides no examples of lobbying in support of World Health Organization (WHO)-endorsed government policies to address malnutrition (including obesity and diet-related NCDs) in the US, at federal, state, or local levels, and it does not publish its position on these policies.
- Mars publishes a partial list of trade association memberships in the US, and indicates which it holds Board seats on.
- Mars does not make any political contributions in the US from the company treasury, nor does it have an employee political action committee.
- Regarding stakeholder engagement in the US, Mars is a member of several nutrition-related multistakeholder platforms, including the Obesity Roundtable, NASEM/IOM Food Forum, and Tufts University Food and Nutrition Innovation Council.

Areas of improvement

- Mars is encouraged to: assign to its board oversight of its lobbying activities and policies; enhance its processes to review and manage relationships with trade associations; and undertake audits of the company's lobbying activities, disclosure, and compliance with its lobbying policies.
- Mars 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, such as fiscal measures to address obesity, regulatory restrictions on marketing/advertising unhealthy products (to children), or increased FOP labeling requirements, whether at federal, state, or local level. It could also significantly improve its disclosure regarding its lobbying positions on these key public health policies. These positions should be as specific and unambiguous as possible. Publishing links to specific documents used in government engagements is also encouraged.
- Mars is also recommended to be more explicit on its website about the role of the SFFPA as one of the company's key channels for nutrition-related lobbying in the US.
- Mars is recommended to disclose a more comprehensive list of trade association memberships in the US, and to disclose the amount of dues used for lobbying purposes for each.
- While it publishes a link to its Lobbying Disclosure Acts reports on its website, Mars should 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.
- Mars should ensure it engages with a wide range of nutrition-specific stakeholders in one-to-one discussions regarding its nutrition strategies and activities in the US. This engagement should seek to inform these stakeholders about the companies' existing activities and future plans, and aim to solicit feedback and gather insights to ensure these are sufficiently aligned with the public health interest.
- Mars is recommended to be transparent about the identities of any experts it consults and the organizations and platforms it engages with, as well as indicating the degree of financial compensation for these engagements.
- Mars is encouraged to improve its public reporting of the content of discussions during stakeholder engagements, and which aspects of the company's nutrition-related activities are being discussed. Importantly, the company should also be clear about the outcomes of the engagements, and how they were used to change its practices or plans.

Product Profile ^{i 4}



11

Rank 11/11 / Score 1.3/5

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 ^{i 5}
	Total no. products assessed	% of distinct healthier products	% sales from healthier products*	
1.3	1166	15%	13%	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.

▪ Mars' average sales-weighted HSR is 1.3 (stars) out of 5 (1.4 unweighted), ranking 11th out of the 11 companies assessed in the Product Profile. A total of 1166 products across the company's five best-selling product categories were assessed using the HSR system. ▪ 15% of distinct products analyzed for Mars 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 13% of its 2021 US retail sales from healthier products. These results are largely influenced by the fact that Mars derives majority of its US sales from the Confectionery category (leading brands include M&M's, Snickers and Extra).

Mean Health Star Rating by category for Mars, Inc.

	No. of products assessed	Mean HSR
Confectionary	920	1.1
Ice Cream	45	1.3
Rice, Pasta and Noodles	82	3
Savoury Snacks	19	0.7
Sweet Biscuits, Snack Bars and Fruit Snacks	100	2.9

▪ Among categories assessed, Mars' products in the Rice, Pasta and Noodles category (including Ben's original and Seeds of Change brands) had the highest mean HSR (3.0 out of 5), followed by the Sweet Biscuits, Snack Bars and Fruit Snacks (KIND Bars and Nature's Bakery) category (2.9 out of 5). A total of 82 products from the Rice, Pasta and Noodles category were analyzed, and 48 (or 59%) met the 'healthy' threshold. A total of 100 Sweet Biscuits, Snack Bars and Fruit Snacks products were analyzed, with 27 meeting the 'healthy' threshold. A total of 920 Confectionery products were analyzed, with 98 (11%) meeting the 'healthy' threshold.

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Footnotes

1. 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.
2. The current Product Profile score accounts for 20% of the total Index score. It corresponds to criterion B1 of the Index.
3. 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.
4. 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.
5. Retail sales data derived from Euromonitor International.

