

SIGNATORIES' EVALUATION OF SANULAC'S CALL TO ACTION ROADMAP

10 January 2022

The Signatories' intention was that companies would first commit to all of the asks set out in the Call to Action and deliver a roadmap to outline how and when each of the commitments would be implemented.

SANULAC, Lactalis Group's division on infant nutrition, has submitted an initial response on December 11th, 2020. The company then submitted its roadmap on December 22nd 2021.

In terms of Call to Action specific steps:

	SANULAC's commitments in relation to the Call to Action	Related action as set out in roadmap	Signatories' evaluation of roadmap <i>ATNI provides input in assessing the planned actions against the 4 Asks of the Call to Action</i>
Ask 1 Public commitment to full Code compliance, and disclosure of a concrete plan of action	In the submission of its response to the Call to Action, the company did not commit to full Code compliance by 2030.	In the submitted roadmap, SANULAC reinstates that its first commitment is to align its Charter in accordance with the mandated regulations implemented in each country where SANULAC operates. SANULAC also notes in the roadmap that it "acknowledges the importance of the principles of the World Health Organisation International Code of Marketing of Breast-Milk Substitutes of 1981 (WHO Code)" and that it is planning on implementing this Global Charter to its infant formula intended for "infants up to the age six months of life" and "any other products being marketed or otherwise presented as a partial or total replacement for breast milk, whether or not suitable for that purpose".	The signatories welcome SANULAC's commitment to develop and consequently implement its global Charter on BMS marketing. However, although SANULAC has disclosed a plan of action, the company does not indicate a commitment towards full unilateral compliance with the WHO Code (including all subsequent resolutions) by 2030 applicable to all its BMS products intended for 0-36 months. <i>Ask 1 is not yet met.</i>
Ask 2 If company has no BMS policy, adopt and uphold a global Code-	In its initial response, SANULAC committed to develop a global Charter for BMS marketing which would become the basis of its policy in countries	SANULAC indicates within the submitted plan of action that in 2021 it has "put in place an internal Working Group including Regulatory and Marketing Departments of the Group's Zones to develop a Global SANULAC Charter", which should be completed by the end of February 2022 according to this roadmap. The plan is to present the Charter to all SANULAC personnel involved in BMS marketing and implement it in 2022.	SANULAC did not yet take the first step that was requested in Ask 2 by the end of 2020. In order to meet Ask 2, SANULAC's BMS marketing policy should be fully aligned with all provisions of the WHO Code (including the subsequent WHA

aligned BMS marketing policy for BMS 0-12 months	where local regulations are less stringent.		resolutions) and applied unilaterally in all countries for BMS products 0-12 months. <i>Ask 2 is not yet met.</i>
Ask 3 Supporting national legislation fully aligned with the Code	The company did not state that it will support the adoption and implementation of national legislation fully aligned with the Code.	SANULAC does not address Ask 3 in the submitted roadmap either.	The signatories urge SANULAC to commit to support the adoption and implementation of national legislation fully aligned with the Code in order to create a level playing field for all companies. <i>Ask 3 is not yet met.</i>
Ask 4 Agree to provide information to ATNI	SANULAC has agreed to share its Global Charter on BMS marketing with ATNI. Given Lactalis was not included in the BMS/CF Marketing Index 2021, no information has been requested/ submitted within that process.	SANULAC indicates in the submitted roadmap that it plans to contact ATNI within the first semester of 2022 to present its global Charter.	The signatories welcome the company's willingness to engage with ATNI and have its progress monitored towards achieving the stated commitments. <i>Ask 4 is met.</i>