



MEGMILK SNOW BRAND Co., Ltd.

HEAD OFFICE

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June 17, 2021

To whom it may concern,

Meridian Institute

105 Village Place

Dillon CO 8043a

U.S.A.

Dear Sir/Madam,

Please let me explain the ideas of us, MEGMILK SNOW BRAND Group, for your inquiries of Breast-milk Substitutes Call to Action, which was delivered to us on March 25", 2021 by mail.

We, MEGMILK SNOW BRAND Group, respect WHO's International Code of Marketing of Breast-milk Substitutes and WHA's Resolution on Infant and Young Child Feeding by recognizing the importance of breastfeeding. We commit ourselves, at the present as for the future, to comply with the local rules and regulations in conducting marketing activities in all countries and areas where we sell products. And we are preparing for the release of our marketing policy of products for an age for 12 months or less so that we may perform the publication on our company website immediately in future.

#### **Signatories' assessment**

**Ask 2: As a first step towards full Code compliance, by the end of 2020, adopt a Code-aligned BMS marketing policy for all countries for products marketed as suitable for infants between birth and 12 months of age, and commit to upholding your policy including in all jurisdictions where regulations are absent or less stringent than your policy. In countries where national law is more stringent than your policy, adherence to national law always takes precedence.**

While the company notes that it plans to adopt a BMS marketing policy, it has not yet done so and its scope therefore cannot be assessed. To fully meet this ask, the company would need to ensure that its policy is fully Code-aligned for products marketed as suitable for infants from birth to 12 months, apply this policy to all countries, and commit to upholding its policy in all jurisdictions, even where regulations are absent or less stringent.

In addition, we also commit to make the necessary steps for the year of 2030. At the first step, we will understand clearly marketing activities in all the countries or areas where we sell products. As for the second step, we will make planning to revise these activities if necessary. We will implement the new activities as the third step.

### **Signatories' assessment**

**Ask 1: Publicly commit your company to full compliance with the International Code of Marketing of Breast-milk Substitutes and subsequent resolutions (the Code) globally (including covering of breast-milk substitutes up to 36 months of age), and disclose a concrete plan for achieving this goal by 2030 at the latest, with delineation of clear incremental steps.**

The company does not make the requested commitment to achieve full compliance with the Code by 2030.

We, MEGMILK SNOW BRAND Group, believe that breast milk is the best nutrition for babies and infants for their healthy growth. Thus we have been continuously researching into human breast milk more than half a century. We made the first national-scale research into human breast milk in Japan in 1960. The second research was done in 1989 with the world's largest scale at that time, which collected 2,727 samples from 2,434 mothers of the all over Japan. We analyzed these samples about 180 nutrient compositions and presented many papers about the research. We have been conducting research at the third time from 2015 to now and publishing the results of the research for the latest knowledge widely. These pieces of research consist not only of the analysis of nutrient compositions of human breast milk but of some other fields such as a variety of its function, baby's stool conditions, the effects of mother's meal and eating habits, etc.



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We are confident that we have been contributing to provide babies and infants all over the world with the most suitable nutrition, which are the parts of support for mothers who cannot breastfeed a baby for health reason and others.

If an establishment of the new laws and regulations is pushed forward in Japan, we are ready to cooperate with its adoption and practice from now on. In Japan, it is a common practice for the government authorities to ask for public comments or feedback through the association of business group for a disclosed draft of laws and regulations being proposed. We, MEGMILK SNOW BRAND Group, will support the adoption and practice of the related laws and regulations along with the procedures above. Additionally we will cooperate to provide Access to Nutrition Initiative (ATNI) with necessary information.

#### **Signatories' assessment**

**Ask 3: 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.**

The company commits to support the adoption and implementation of relevant national legislation. To fully meet this request, the company would need to add that it supports national legislation fully aligned with the Code.

#### **Signatories' assessment**

**Ask 4: Agree to provide information on your company's policies and practices to the Access to Nutrition Initiative (ATNI) as requested, recognizing ATNI as an independent actor responsible for monitoring companies' progress toward their plans for achieving Code compliance.**

The company makes the requested commitment.

Megmilk Snow Brand is not included in ATNI's 2021 BMS/CF Marketing Index. It may be included in future Indexes.

We appreciate your understanding our policy and commitment as above.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Keiji Nishio". The signature is fluid and cursive, with a large initial "K" and "N".

Keiji Nishio

Representative Director and President

MEGMILK SNOW BRAND Co., Ltd.