

GLICO
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES



Ezaki Glico Co., Ltd.

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Osaka 530-0018, Japan

23th April 2021

Dear Sir/Madam,

This is in response to your letter dated 26 January, 2021 regarding the Call to Action. We, Ezaki Glico Co., Ltd., are working toward a contribution to people's health, which is in line with our corporate philosophy. As a BMS manufacturer, we hereby respond to the Call to Action as follows:

1. We are committed to complying with the Code, and will take necessary steps to develop our action plan for promoting such compliance globally by 2030.

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 fully meet the requested commitments. Glico does not commit to FULL compliance with the Code and it does not explicitly commit to covering all breast-milk substitutes from 0-36 months of age.
To this date, no plan had been disclosed on achieving full Code compliance by 2030.

2. We will start preparation for adopting a Code-aligned BMS marketing policy to be upheld in all jurisdictions where we are engaged in the BMS business.

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 Code-aligned 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.

Further evaluation will be needed to determine whether the forthcoming policy is fully Code-aligned.

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3. We will support the adoption and implementation of the domestic legislation aligned with the Code.

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 national legislation aligned with the Code. To fully meet this request, the company would need to add that it supports national legislation fully aligned with the Code.

4. We are prepared to provide such information to ATNI to the extent possible.

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.

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

We appreciate your invitation to the Call to Action, and hope that we could cooperate in improving health for babies and mothers.

Sincerely yours,

EZAKI Katsuhisa
President & CEO
Ezaki Glico Co., Ltd.