

SIGNATORIES' EVALUATION OF GLICO'S CALL TO ACTION ROADMAP

8 November 2021

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.

Glico submitted an initial response on April 23, 2021 followed by a submission of its roadmap on October 13, 2021. Given some ambiguity in the roadmap, ATNI requested clarification of some points; the company responded on October 20, 2021 based on which the analysis below is set out. The underlined text indicates the clarifications received by Glico.

In terms of Call to Action specific steps:

	Glico's commitments in relation to the Call to Action	Related action as set out in roadmap	Signatories' evaluation of roadmap ATNI provides input in assessing the planned actions against the 4 Asks of the Call to Action
Ask 1 Public commitment to full Code compliance, and disclosure of a concrete plan of action	In its initial submission, Glico did not fully meet Ask 1 of the Call to Action. The company stated a commitment to comply with the Code and develop an action plan to achieve compliance globally by 2030, however the commitment was not explicit on full compliance with the Code covering all BMS 0-36 months.	Glico sets out a commitment to full Code compliance within the submitted roadmap by stating the following: <i>"We are fully aware of the importance of the WHO International Code of Marketing of Breast milk Substitutes (the "WHO Code") and its relevant World Health Assembly resolutions (the "WHA Resolutions") and we commit ourselves to comply with them. To completely follow the WHO Code and the WHA Resolutions <u>globally</u>, we will take the following actions, by the end of 2030, on all of our breastmilk substitutes for infants aged 0 to 36 months."</i>	In addition to Glico's initial submission, the roadmap states an explicit unilateral commitment to achieve full compliance with the International Code of Marketing of Breast-milk Substitutes and all WHA resolutions globally, covering BMS 0-36 months (which should also include all formulas for special medical purposes as these are also defined by WHO as BMS). These commitments are welcomed and align with the first component of Ask 1 of the BMS Call to Action. However, to fully meet Ask 1 Glico needs to disclose a plan of action with clear concrete steps towards achieving full Code compliance by 2030, by explaining

			<p>how and by when changes would be implemented to reach the intended goal.</p> <p>Such changes would include:</p> <ul style="list-style-type: none"> - adopting a BMS marketing policy fully aligned with the Code - applying the policy in all markets and upholding it even where local BMS marketing regulations are absent or weaker than the company policy - plans on implementing the changes in marketing practices on the ground <p><i>Ask 1 is not yet met. Although the company makes the requested commitment to full Code compliance and has disclosed a plan of action, the roadmap does not include clear concrete steps of intended changes in policy and practice in all markets.</i></p>
<p>Ask 2 If company has no BMS policy, adopt and uphold a global Code-aligned BMS marketing policy for BMS 0-12 months</p>	<p>Glico did not have a BMS marketing policy in place although the company noted that it planned on adopting a Code-aligned policy to be upheld in all jurisdictions where the company markets BMS. 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</p>	<p>Glico states in the roadmap, <i>"We will develop and announce the Glico Group's breastmilk substitute policies <u>that would be upheld in all jurisdictions even where regulations are absent or less stringent than the company's policies</u>, by the end of 2022."</i></p>	<p>Glico still does not meet Ask 2 as no Code-aligned BMS marketing policy has been adopted yet.</p> <p><i>Ask 2 is not yet met.</i></p>

	<p>this policy to all countries, and commit to upholding its policy in all jurisdictions, even where regulations are absent or less stringent.</p>		
<p>Ask 3 Supporting national legislation fully aligned with the Code</p>	<p>Glico stated its willingness to support the adoption and implementation of national legislation aligned with the Code. To fully meet this request, the company would need to ensure that it supports national legislation that is in full alignment with the Code.</p>	<p>Glico stated in its roadmap and clarified that they <i><u>“will support the adoption and implementation of the domestic legislation aligned with the WHO Code”</u></i>.</p>	<p>Similar to its initial response to the BMS Call to Action, to fully meet this request, Glico is urged to commit to support the adoption and implementation of national legislation <u>fully aligned with the Code</u> in order to create a level playing field for all companies.</p> <p><i>Ask 3 is not yet met.</i></p>
<p>Ask 4 Agree to provide information to ATNI</p>	<p>Glico agreed to provide information to ATNI relating to its BMS marketing policies and practices.</p>		<p>The signatories welcome the company’s willingness to engage with ATNI and have its progress monitored towards achieving the stated commitments.</p> <p><i>Ask 4 has been met.</i></p>