

FRIESLANDCAMPINA
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES



Royal FrieslandCampina

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Dear signatories of the BMS Call to Action,

FrieslandCampina welcomes the Call to Action and supports the ambition to improve the health and nutrition of mothers, infants and young children everywhere. We appreciate the opportunity given to respond to this Call to Action and to outline our ambition.

FrieslandCampina believes that breastfeeding is the best way to ensure healthy growth and development of infants during the first months of life. We support the WHO's recommendation for exclusive breastfeeding for the first six months of life and continued breastfeeding along with the introduction of safe and appropriate complementary feeding up to two years of age or beyond.

Our company policy and standard regarding the responsible marketing of infant foods is aligned with the aim and principles of the International Code of marketing of Breast-milk Substitutes and subsequent relevant WHA Resolutions (the Code). We comply with the national legislation in each country where we market our products, including national legislation or local code that has fully or partly transposed the Code, in accordance with the local context. This is also applicable in countries where national law is more stringent than our policy.

FrieslandCampina shares the aim of improving nutritional outcomes for mothers, infants and young children and acknowledges the Call to Action's ambition of full compliance with the Code globally by 2030. While FrieslandCampina currently has an extensive policy in place, we are always looking for continuous improvement. We recognize that change will take time and we believe that making meaningful progress in overall improvement of health and nutrition of infants and young children needs the collaboration of all stakeholders. The differentiated level of national legislation globally and the level of engagement of various stakeholders in this complex ecosystem causes the challenge of reaching a so-called level playing field. For FrieslandCampina, achieving a level playing field is essential in order to go beyond legislation and/or local codes as laid down by local governments. Therefore, we encourage the multiple stakeholders to take those important steps up to a level playing field together.

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Before the agreed deadline, FrieslandCampina will publicly share a more detailed roadmap which will outline the next steps to be taken within our company.

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. The company does state that it will publish a detailed roadmap outlining the steps it is willing to take. To fully meet this request, the roadmap would need to cover all BMS products up to 36 months and all countries. The signatories will evaluate and publish a separate assessment of the plan when it is submitted.

In most countries where we operate, national legislation and/or local code is already in place for products intended for infants between birth to 12 months, considered as substitutes for breast milk. This is based on WHO breastfeeding recommendations, which we support. Therefore, FrieslandCampina is willing to apply the same scope in countries where national legislation and/or local code is less strict, when there is a system with equal opportunities for all stakeholders. This means that, for now, we can only partially commit, but we are prepared to take this step when an enabling environment has been achieved.

Signatories' assessment

Ask 2: As a first step towards full Code compliance, by the end of 2020, for a company that has a BMS marketing policy in place (as is the case for FrieslandCampina), ensure that your current policy and practices (including promotion to consumers and healthcare providers) are Code-aligned and for products marketed as suitable for infants between birth and 12 months of age, extend them to all countries, and commit to upholding your policy in all jurisdictions even 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.

The company does not make all of the requested commitment. The Signatories acknowledge that the scope of the company's current published policy is BMS products marketed as suitable for infants between birth and 12 months of age. To fully meet this request, the company would need to extend its current policy to all countries irrespective of the scope of national laws and regulations.

We await the results of ATNI's 2021 BMS Marketing Index to determine the extent to which the company's current policy and practices for these products align with the Code and all subsequent relevant WHA resolutions. The results of the 2018 Index indicated that they did not do so.

Achieving a level playing field is essential for FrieslandCampina and therefore we are committed to support national governments in creating such environments. FrieslandCampina supports national governments in their efforts to promote breastfeeding and developing health policies and national standards regarding BMS marketing that are appropriate, practical and feasible in

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the social and legislative framework. In addition, we collaborate with governments monitoring the measures and application of the WHO 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.

FrieslandCampina states that achieving a level playing field is essential and therefore they are committed to support national governments in creating such environments. To fully meet this request, the company would need to add that it supports national legislation fully aligned with the Code.

FrieslandCampina agrees to provide information on our policies and practices to the Access to Nutrition Initiative (ATNI). We support the aim of ATNI to objectively assess and improve the contribution the private sector makes to addressing global nutrition challenges. Currently, as well as in previous years, we are actively providing ATNI with all the data they need to perform their assessment, and we will continue to do so. We have appreciated their objective assessment and feedback on our policies and practices over the last few years, which helped us to move forward. We believe there is a mutual trust in the current collaboration and we see ATNI as an excellent partner for the continued monitoring of our progress in the future.

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.

FrieslandCampina is included in ATNI's forthcoming 2021 BMS Marketing Index.

We feel confident that our reply explains our view in a meaningful way on all the points raised in the Call to Action. We look forward to receiving the signatories' constructive response.

Sincerely,



Hein Schumacher,
CEO Royal FrieslandCampina