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<td>Approving body</td>
<td>Executive Board of FrieslandCampina</td>
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| Target audience  | FrieslandCampina employees, distributors and other partners of FrieslandCampina involved in the marketing and sales of FrieslandCampina branded foods for infants and young children  
|                  | Interested members of the public |
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# Table of contents

- Introduction .......................................................................................... 4
- FrieslandCampina Commitment ................................................................. 4
- Purpose .................................................................................................. 4
- Application and scope ............................................................................ 5
- Responsibilities ...................................................................................... 5
- FrieslandCampina Guiding Principles ....................................................... 5
Introduction

The WHO International Code of Marketing of Breast milk Substitutes (‘the Code’) was adopted by the World Health Assembly (WHA) in May 1981. Since then, a number of World Health Assembly Resolutions referring to the marketing and distribution of breast milk substitutes have been adopted.

As stated in one of the preambles of the Code, manufacturers and distributors of breast milk substitutes have an important and constructive role to play in relation to infant feeding, and in the promotion of the aim and principles of the Code and its proper implementation.

FrieslandCampina Commitment

FrieslandCampina is dedicated to improve the health of infants and young children. We have expressed our ambition to grow as a worldwide player in the market of foods for infants and young children. To do this in a responsible way, it is important that the principles of the Code are well rooted in our company’s way of working and that we act in accordance.

FrieslandCampina is committed to adhere to the aim and principles of the Code and subsequent relevant WHA Resolutions: to contribute to the provision of safe and adequate nutrition for infants and young children, by the protection and promotion of breastfeeding and by ensuring the proper use of breast milk substitutes, when these are necessary, on the basis of adequate information and through appropriate marketing and distribution. Employees and partners of FrieslandCampina involved in the marketing and sales of products for infants and young children shall be aware and act accordingly.

Purpose

The purpose of the FrieslandCampina Corporate Policy for the Marketing of Infant Foods (‘the Policy’) is to align FrieslandCampina’s marketing and sales practices with the recommendations of the Code and subsequent relevant WHA Resolutions. It contains nine Guiding Principles which outline our approach to the marketing and sales of FrieslandCampina branded products for infants and young children. It describes the behavior that is expected from employees and partners of FrieslandCampina who are involved in the marketing and sales of those products.

In addition to the Policy, the FrieslandCampina Corporate Standard for the Marketing of Infant Foods has been created in order to describe FrieslandCampina’s commitment in relation to each article of the Code. Furthermore, a number of tools have been developed to facilitate the implementation of the Policy and the Standard within the company and to guide the day-to-day business practices.
Application and scope

This Policy applies for the whole company. In all countries where FrieslandCampina branded products for infants and young children are available, marketing and sales practices must be aligned with this Policy. In addition, the marketing and sales of our products are subject to national legislation and codes.

The scope is defined per country based on applicable legislation or code and determines what is considered as “covered products”. In absence of this, covered products are defined as FrieslandCampina branded formulas for healthy infants and infants with special medical needs from birth to 12 months. Some provisions also apply to “excluded products” to ensure that marketing and sales of those products are not in contradiction with this Policy.

Responsibilities

The FrieslandCampina Executive Board has the overall accountability for this Policy. It has been developed by the Corporate Public & Quality Affairs department of FrieslandCampina which is also responsible to introduce amendments, where necessary.

The Managing Director of each FrieslandCampina Operating Company is responsible to ensure that FrieslandCampina employees and distributors are aware of and comply with the principles of this Policy. Topic leaders are in charge of implementing this Policy in the day-to-day activities of each Operating Company, including the development and application of procedures to check and ensure that our product labels, marketing, sales and promotion activities are in line with this Policy.

All personnel involved in the marketing and sales of FrieslandCampina branded products for infants and young children have the responsibility to adhere to and comply with the principles of this Policy.

FrieslandCampina Guiding Principles

1. We adhere to the Code and comply with national legislation and codes

The FrieslandCampina Policy for the Marketing of Infant Foods is based on the aim and principles of the Code and subsequent relevant WHA Resolutions. In addition, FrieslandCampina is committed to comply with the national legislation and codes in each country where we market our products, taking into account the local social and cultural practices.

2. Breast milk is best

Breastfeeding is the best way to ensure healthy growth and development of infants during the first months of life. FrieslandCampina supports the WHO’s recommendation for exclusive breast feeding 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 marketing and sales activities do not discourage (continued) breastfeeding.

2 Including sales organizations, staff departments etc., in the further text referred to as Operating Company
3. Parents have the right to an informed choice based on independent advice
When mothers cannot or choose not to breastfeed for whatever reason and a safe alternative for breast milk is required, there is a legitimate position for formulas for infants. In such cases, FrieslandCampina believes that parents have the right to make an informed choice on how to feed their child. Therefore, parents should have access to reliable and science based information on the feeding options and on the correct and safe use of formulas for infants, amongst others via well informed, independent health workers.

4. Covered products are not promoted to consumers
FrieslandCampina does not seek contact of any kind with consumers about covered products. Advertising, sampling and promotional activities of covered products is not allowed towards the general public. Complementary foods for infants should not be indicated as suitable for introduction before six months and should not be marketed for use by infants of less than six months.

5. Our product labels provide clear and understandable information
Labels of covered products contain understandable information on the correct and safe use of the product and do not idealize their use by means of text or pictures. On labels of covered products, it is emphasized that breastfeeding is the best way of feeding infants and that professional advice should be sought before using such a product.

6. Interaction with health workers is subject to strict conditions
For transfer of adequate information, product innovation and evaluation, interaction between FrieslandCampina employees and health workers is important. This shall be performed under strict conditions. Supply of covered products to institutions, sponsorship, funding and gifts to health workers are bound to specific rules. In all cases, the support and supplies that are provided should be documented in a transparent and verifiable manner.

7. Our products and information materials for health workers are based on sound science
FrieslandCampina is dedicated to continuous product improvement and science based innovation. FrieslandCampina only produces and distributes information materials to health workers that is factual and based on sound science and that support our goal of providing safe and appropriate nutrition for infants and young children.

8. Our performance management system stimulates compliance
FrieslandCampina employees involved in the marketing and sales of products for infants and young children are aware of the aim and principles of the Code and this Policy and act accordingly. Training on this Policy is implemented in a systematic way within the company. The internal performance management system is set up in a way that allows alignment of key performance indicators with our Policy and stimulates employees to comply.

9. Our compliance is ensured by monitoring
FrieslandCampina monitors the compliance of its marketing and sales activities of products in scope of this Policy. Where necessary, FrieslandCampina takes measures to reassure compliance.