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FrieslandCampina Corporate Policy for the Marketing of Infant Foods

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Introduction

The WHO International Code of Marketing of Breast milk Substitutes ('the Code') was adopted by the World Health Assembly (WHA) in May 1981¹. Since then, several WHA 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.

At FrieslandCampina, we are dedicated to enhancing the health of infants and young children. To achieve this responsibly, it is important that the aim and principles of the Code are well embedded in our company's practices and that we consistently adhere to them. By this we contribute to delivering to the United Nations Sustainable Development Goals, specifically Number 2 "Zero Hunger" and Number 3 "Good Health and Well-being".

Purpose

The aim of the FrieslandCampina Corporate Policy for the Marketing of Infant Foods ('this Policy') is to:

- Align our marketing practices with the recommendations of the Code and subsequent relevant WHA resolutions
- Enhance the understanding of FrieslandCampina employees, directly contracted distributors and partners involved in the marketing of covered products on how to apply those recommendations
- Achieve compliance of our marketing practices with this Policy

In this Policy, we state our commitment to support and protect breastfeeding, describe the application and products in scope of this Policy and lay down our Guiding Principles for Compliance and our Management System for Compliance.

Commitment

At FrieslandCampina, we are responsible for our marketing practices.

We are 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.*

FrieslandCampina employees, directly contracted distributors and partners involved in the marketing of breast milk substitutes are aware of the aim and principles of the Code as well as of the provisions of this Policy and act accordingly.

¹ [World Health Organization International Code of Marketing of Breast-milk Substitutes 1981, Geneva](#)

Application and scope

The FrieslandCampina Corporate Policy applies worldwide to Royal FrieslandCampina N.V., its subsidiaries and all legal entities in which it has management control and all its and their employees, directly contracted distributors and partners involved in the marketing of covered products.

FrieslandCampina has no direct influence on third party businesses with whom we have no direct contractual relationship and respects the limitations set by competition law.

This Policy applies to covered products. Covered products are formulas for healthy infants and infants with special medical needs from birth to six months as well as other products for infants and young children specified in applicable national legislation and local codes implementing the Code. In all countries where FrieslandCampina covered products are sold, marketing practices are aligned with this Policy and follow national legislation and local codes implementing the Code.

Guiding Principles for Compliance

Our ten Guiding Principles for Compliance ensure that our marketing practices align with the recommendations of the Code. These principles detail our commitment to each article of the Code, clarify our approach to marketing covered products and outline the expected behavior of FrieslandCampina employees, directly contracted distributors and partners involved in the marketing of these products.



1. Breast milk is best

WHO Code Article 1: Aim of the Code

Breastfeeding is the best way to ensure healthy growth and development of infants during the first months of life. We support the WHO recommendation of exclusive breastfeeding during 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.

For mothers who are unable or choose not to breastfeed and for infants with special medical needs who cannot be breastfed, a safe alternative to breastfeeding is required. FrieslandCampina has developed and provides breast milk substitutes that are produced in accordance with stringent international compositional and safety standards. We also have a responsibility to ensure that our marketing activities do not hinder the promotion and protection of breastfeeding, nor discourage a mother's choice and ability to breastfeed.



2. We adhere to the Code and comply with national legislation and local code

WHO Code Article 2: Scope of the Code

We comply with national legislation and local codes implementing the Code and subsequent relevant WHA resolutions in every country where we market our products. In addition, we apply a company-wide Policy based on the aim and principles of the Code and subsequent relevant WHA resolutions. Every FrieslandCampina employee, directly contracted distributor and partner involved in the marketing of covered products adheres to this Policy. If there are discrepancies between this Policy and mandatory national legislation and local codes, we apply the stricter provision.

Products in scope of this Policy are referred to as "covered products". At a minimum, these include infant formula and formula for special medical needs for infants from birth to six months in all countries where we market our products. In addition, in countries where applicable national legislation and/or local codes implementing the Code impose marketing restrictions for other foods for infants and young children, those are also considered covered products and this Policy applies to them in these countries. This includes follow-on formula, food for special medical purposes for older infants, young child formula, and/or complementary food, as applicable.



3. Parents have the right to an informed choice based on independent advice

WHO Code Article 4: Information and education

When a safe alternative for breast milk is required, breast milk substitutes have a legitimate role. In such situations, parents and caregivers have the right to make an informed decision about how to feed their child. We support governments in ensuring that parents and caregivers receive accurate, reliable,

adequate and consistent information on infant feeding options and on the correct and safe use of breast milk substitutes, including through well informed, independent health workers.

Informational and educational material for consumers dealing with the feeding of infants contains mandatory statements on breastfeeding: (a) the benefits and superiority of breastfeeding, (b) maternal nutrition, and the preparation for and maintenance of breastfeeding, (c) the negative effect on breastfeeding of introducing partial bottle feeding, (d) the difficulty of reversing the decision not to breast feed.

When such material contains information about the use of covered products, they include in addition information on (e) the proper use of covered products, whether manufactured industrially or home-prepared, (f) the social and financial implications of using covered products, (g) the health hazards of inappropriate foods or feeding methods, and (h) the health hazards of unnecessary or improper use of covered products.

Material about infant feeding does not use text or images, including pictures of infants, which may idealize the use of covered products or suggest that bottle feeding is equivalent or superior to breastfeeding. Non-idealizing pictures can be used for educational purposes. Instructions of use of covered products may include brand names and pack shots of specific covered products, when needed to avoid confusion with other products. This material is distributed to consumers only through health workers.

Informational or educational equipment or material intended for consumers related to maternal and child health for use in health care facilities may be provided at the request and with the written approval of the appropriate authority or institution or within government guidelines or applicable national law issued for this purpose. Such informational or educational equipment or material may bear the company name and logo, but do not reference covered products brands, and are distributed solely through the health care system.



4. Covered products are not promoted to consumers

WHO Code Article 5: General public and mothers

Advertising and promotion in any written, audio, visual or digital form of covered products and of equipment or utensils for their preparation or use, such as feeding bottles and teats, towards the general public is not allowed.

Sampling, directly or indirectly, of covered products to consumers, including own personnel, is not allowed.

FrieslandCampina should not use point-of-sale advertising or any other promotional devices to induce sales of covered products to consumers on retail level. FrieslandCampina does not initiate or encourage retail customers, directly contracted distributors and partners that market our covered products to price promote covered products, by using discount coupons, premiums, rebates, special sales, initial low promotional price (loss-leaders) and tie-in sales, in order to increase sales of covered products to consumers. This provision does not restrict the establishment of pricing policies and practices intended to provide covered products at lower prices on a long-term basis.

Based on local competition law, we do not interfere with the independent decision of retail customers, distributors and partners that market our covered products to offer discounts or other price related promotions to their customers on their own account.

Gifts, gift packs, non-educational items, articles or other utensils that could promote the use of covered products or bottle feeding are not distributed to consumers.

FrieslandCampina marketing personnel does not seek, in their business capacity, direct or indirect contact with consumers for the purpose of promoting and advertising covered products. However, this does not prevent trained FrieslandCampina personnel from responding directly to unsolicited product and quality related inquiries from consumers about covered products and other foods for infants and young children via telephone helplines, websites, and social media. When consumers seek advice on health-related issues, they should be directed to health workers.

Complementary foods for infants indicate the appropriate age of introduction and are not advertised for use by infants of less than six months.



5. Covered products are not promoted in health care facilities

WHO Code Article 6: Health care facilities

Health care facilities and health workers play an important role in promoting and protecting breastfeeding and in providing adequate nutrition to the infants in their care. We aim to provide safe and appropriate nutrition for infants and young children in need.

Promotion and sampling of covered products to the general public in health care facilities is not allowed, whether directly or through health workers. This provision does not restrict the dissemination of scientific and factual information on covered products to health workers in health care facilities.

Health care facilities are not used to host events, contests, or campaigns related to covered products, nor for the display of covered products, placards or posters concerning covered products. Additionally, they are not used for the distribution to consumers of material related to covered products provided by FrieslandCampina or one of our directly contracted distributors and partners involved in the marketing of covered products, except as specified in Guiding Principle 3.

We do not provide or pay for “professional service representatives”, “mother craft nurses” or similar personnel working in the health care system to advise consumers or perform similar duties related to covered products.

Advisory service arrangements with health workers may be set up for professional purposes such as the advancement of science and education on health and nutrition of infants and young children. These arrangements are transparent, well-documented and do not engage the health worker in promotion or marketing of covered products. Reasonable, fair market compensation for these services and reimbursement of reasonable expenses directly related to these services can be offered.

FrieslandCampina employees do not take part or assist in demonstrations towards consumers on preparation or feeding of covered products.

Regular sales of covered products to health care facilities must follow a transparent and established procurement procedure. These products are not provided as an incentive to health workers or health care facilities to purchase, use, prescribe or recommend covered products or any other product of FrieslandCampina.

Donations and low-price sales of covered products can be provided to serve social and/or humanitarian purposes only following a written request and distributed:

- in emergency and disaster situations through government channels and internationally recognized aid agencies, or
- to social welfare institutions or organisations, including orphanages and food banks, or
- officially sanctioned health programmes within the health care system

These products are delivered directly to the requesting party, not to consumers, for distribution to infants who, based on medical advice, must be fed with covered products. It must be ensured that supplies continue as long as requested. Donations or low-price sales of covered products are not used as a sales inducement. All requirements for appropriate labelling of covered products, including safe preparation and use, apply to donated and low-price products as well.

The donation of practice-related equipment and material intended for professional use by health workers is allowed only when permitted under applicable national legislation and local codes. Smaller items related to a health worker's practice can be provided when they are of minimal value and not considered an inducement in the local context. Donation of more valuable equipment and material may be done following a written request from the health care facility and must be documented in a transparent and verifiable manner. The donated items are not used as an inducement to purchase, use, prescribe or recommend covered products. Such equipment or material may bear the company name and logo, but not those of covered products.



6. Interaction with health workers is subject to strict conditions

WHO Code Article 7: Health workers

Health workers play a crucial role in promoting and protecting breastfeeding. They provide consumers with guidance on appropriate infant feeding options based on objective, science-based advice. Whenever requested, FrieslandCampina personnel will make every effort to support health workers fulfilling their responsibilities.

We provide factual, science-based information about our products to health workers, as this is important for product evaluation and innovation. Informational and educational material for health workers dealing with feeding of infants and covered products does not imply or suggest that bottle feeding is equivalent or superior to breastfeeding. This material contains the mandatory information specified in Guiding Principle 3.

Educational meetings about infant nutrition, health, feeding and covered products can only be organized and/or sponsored for the purpose of professional training or as forums for exchanging scientific information. These meetings are held at appropriate venues, conducive to the educational objective. Hospitality is limited to refreshments and/or meals incidental to the main purpose of the meeting and is provided only to the invited health workers. It is not allowed to organize activities at these meetings that could be perceived as incentives to attend for reasons other than professional and scientific purposes.

FrieslandCampina employees do not offer any financial or material inducements to health workers or their families to promote, supply, recommend or sell covered products. If allowed under applicable national legislation and local code, inexpensive gifts not related to the health workers practice may be given infrequently to acknowledge significant national, cultural or religious events, in accordance with local practice. Such gifts may bear the company name and logo, but not those of covered products.

Free covered products and samples of covered products, as well as equipment or utensils for their preparation or use, may be provided to health workers when necessary for the purpose of professional evaluation or research at the institutional level. These products are not used as an incentive to use, prescribe, recommend, or re-sell a particular type or brand of covered product. Distribution of products for professional evaluation are limited in frequency and quantity to prevent excessive allocation to individual health workers.

Contributions on behalf of a health worker for fellowships, study tours, research grants, attendance at professional conferences and symposia, or similar support, can only be made to facilitate professional development and training and to support genuine independent research. These contributions should be disclosed to the institution to which a recipient health worker is affiliated and documented in a transparent and verifiable manner. Support provided is not used as a reward or incentive to use, prescribe, recommend, or promote covered products.



7. Our performance management system stimulates compliance

WHO Code Article 8: Persons employed by manufacturers and distributors

The FrieslandCampina performance management system is aligned with this Policy. Marketing and sales directors ensure that key performance indicators agreed with employees involved in the marketing and sales of covered products are compliant with this Policy. Key performance indicators that stimulate knowledge of and compliance with this Policy, as well as applicable national legislation and local codes, are encouraged. Bonus or incentive calculations for FrieslandCampina marketing and sales personnel do not include targets on sales volume, sales value, market share or quotas of sales for covered products. This does not prevent the payment of bonuses based on overall sales of products marketed by FrieslandCampina.

Commercial contracts with distributors and partners that market our covered products include terms and conditions on the marketing of covered products to ensure compliance with this Policy, as well as relevant national legislation and local codes implementing the Code, where applicable and to the extent permitted by law. Incentives and discounts for the purpose of advertising or promoting covered products are not allowed.

FrieslandCampina personnel employed in marketing of covered products does not, as part of their job responsibilities, perform educational functions for pregnant women or mothers of infants and young children. Such personnel may be used for other functions by the health care system at the request and with the written approval of the appropriate authority.



8. Our product labels provide clear and understandable information

WHO Code Article 9: Labelling

Labels of covered products are designed to provide the necessary information for their appropriate and correct use, so as not to discourage breastfeeding. They also mention that breastfeeding is the best nutrition for healthy growth and development of infants and that professional advice should be sought before using covered products.

Labels of packages or retail units of covered products provide, either printed on the container or on a label which cannot be easily separated from it, the following messages in a clear, conspicuous, easily

readable and understandable manner and in the appropriate languages: (a) the words “Important Notice” or their equivalent, (b) a statement of the superiority of breastfeeding, (c) a statement that the product should be used only on the advice of a health worker as to the need for its use and the proper method of use, (d) instructions for appropriate preparation, use and storage, and (e) information about the possible health hazards of inappropriate preparation, as included in internal guidelines on preparation instructions².

Labels of covered products also include information on (f) the ingredients used, (g) the nutritional composition, (h) the storage conditions, (i) the batch number and (j) the date before which the product is to be consumed, taking into account the climatic and storage conditions of the country concerned, and (k) the appropriate age for consumption.

Labels of covered products do not have pictures of infants or any other images or text which may idealize the use of covered products. Graphics for easy identification of covered products and for illustrating preparation methods may be used. It is not allowed to suggest that covered products are equivalent or superior to breast milk. Terms such as ‘humanized’, ‘maternalized’, and similar terms should not be used on labels. Additionally, labels of covered products should not contain endorsements by health care professionals or other professional bodies.

Inserts giving additional information about covered products and their proper use, subject to the above conditions, may be included in the package or retail unit. When labels give instructions for modifying a product into covered products, the above applies.

Sweetened condensed milk is not marketed, suggested or implied to be used for infant feeding and is neither suitable for infant feeding nor as main ingredient for covered products and does not contain instructions on how to modify it for that purpose.

Other labelling requirements for covered products laid down in national legislation and local code, including those on the use of nutrition and health claims, are followed, as applicable.



9. Our products are of high quality and based on sound science

WHO Code Article 10: Quality

FrieslandCampina is dedicated to continuous product improvement and science-based innovation. Our goal is to provide safe and appropriate nutrition for infants and young children.

Our products for infants and young children meet very strict quality and hygienic standards. They are manufactured under strict hygienic conditions in accordance with FrieslandCampina Foqus Policy on Food Safety & Quality which is based on the FSCC 22000 requirements as well as applicable EU and Dutch legislation and Codex standards. Manufacturing sites comply with the Codex Alimentarius recommended International Code of Practice “General Principles of Food Hygiene” and the “Codex Code of Hygienic Practice of Powdered Formulae for Infants and Young Children”.

The FrieslandCampina Foqus Policy on Food Safety & Quality is leading, also when provisions are stricter than local requirements. In contrast, national legislation must be prioritized, if and where it is stricter than our own standards. If national and own standards are absent, existing Codex Standards are valid.

² These instructions are based on the WHO/FAO Guidelines on Safe Preparation, Storage and Handling of Powdered Infant Formula (2007) and the Codex Alimentarius Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CAC/RCP 66-2008).



10. Compliance is ensured by monitoring and training

WHO Code Article 11: Implementation and monitoring

We respect the role of governments in developing health policies that fit their social and legislative contexts. We are committed to providing constructive, science-based support to these efforts to improve nutrition and health. Interpretation and implementation of the Code are the responsibility of each government. In countries where we operate, FrieslandCampina does not undermine governments efforts to implement the Code. Instead, we support and collaborate with governments and other stakeholders to develop clear, evidence-based national legislation, regulations, or other appropriate measures that uphold the principles and aim of the Code.

The Code requests manufacturers and distributors, amongst others, to collaborate with governments to monitor the application of the Code. FrieslandCampina fully supports these activities. We also seek alignment with trade associations and industry policy groups to ensure that our activities meet the same standards.

Regardless of any measures taken by governments to implement and monitor the application of the Code, FrieslandCampina is responsible for monitoring its own marketing practices. We conduct internal verifications and external audits, as outlined in the Monitoring section of this Policy, to assess compliance of our marketing activities with this Policy as well as national legislation and local codes implementing the Code. These audits help identify non-compliances in our marketing practices and deficiencies in our internal processes.

Confirmed non-compliances, whether reported internally or externally, are addressed with corrective action plans that are documented, implemented, and closed out. Recommendations for improvement and identified areas of risk are considered for future Policy updates.

The findings of internal verifications, external audits, training activities, and allegations handling are annually reported to FrieslandCampina's higher management. An annual compliance status report is published, summarizing the results of external audits and providing an overview of reported non-compliances from all sources.

A dedicated reporting system is in place that allows sharing concerns of non-compliance through a safe and accessible whistleblowing procedure. Our Speak Up system allows both external stakeholders and FrieslandCampina employees to openly or anonymously report potential non-compliances against our Policy, national legislation or local codes related to the marketing of covered products. A defined process ensures that compliance complaints are handled in all countries, guaranteeing timely investigation and response to appropriately correct any misconduct.

A company-wide communication and training system is in place to raise awareness of this Policy. FrieslandCampina employees involved in the marketing of covered products are informed about the aim and principles of the Code and receive regular training about this Policy and its Guiding Principles, as described in the Training section of this Policy. Employee training and knowledge testing about this Policy are systematically implemented within our company. Retail customers, directly contracted distributors, and partners involved in the marketing of covered products are made aware of the Code, this Policy, and the importance of compliance. Directly contracted distributors and partners marketing our covered products are trained about the relevant provisions of this Policy.

Management System for Compliance

At FrieslandCampina we recognize that robust governance mechanisms are essential for the effective implementation and application of this Policy across all levels of the company to achieve compliance. Processes are in place to ensure that the provisions are followed and that FrieslandCampina employees involved in the marketing of covered products are aware of and adhere to these rules.

Our management system for compliance defines roles and responsibilities and includes a company-wide training programme and an audit programme for compliance monitoring. Furthermore, this system establishes provisions for reporting, allegations handling, continuous improvement, and transparent engagement.

Responsibilities

The Executive Board of FrieslandCampina holds overall accountability for this Policy. The Presidents of relevant Business Groups are overall responsible for the implementation and application of this Policy in their business entities.

Managing Directors of Operating Companies and Staff Departments have the responsibility for local implementation, application and compliance monitoring within their respective business entity. They ensure that appropriate procedures and approval processes are in place to establish compliance with this Policy. They can delegate this responsibility to the respective Topic leader.

Topic leaders are responsible for the day-to-day application of this Policy within their Operating Company and Staff Departments. Topic Leaders advise and support the business in implementing and applying this Policy in the daily activities, e.g. through the adoption of appropriate procedures, development of guiding manuals, provision of trainings, monitoring and internal reporting of non-compliances. They also ensure that FrieslandCampina employees, directly contracted distributors and partners involved in the marketing of infant foods are aware of and receive training about this Policy. Topic leaders, preferably senior marketing managers, are appointed by the Managing Director of the Operating Company or Staff Department.

Every FrieslandCampina employee is responsible for adhering to and complying with the provisions of this Policy. This includes FrieslandCampina employees directly or indirectly involved in the marketing of covered products or those who deal with covered products as part of their job, e.g. communication, regulatory, legal and public affairs. They must be aware of the rules and act accordingly.

The responsibility for policy setting, global compliance monitoring and reporting on the application of this Policy lies with Corporate Regulatory Affairs to ensure consistency in approach and separation of duty from our infant nutrition business. Corporate Regulatory Affairs also undertakes regular review and update of this Policy, subject to approval of the Executive Board, as well as other supporting documents such as global training material.

Training

The Guiding Principles of this Policy are communicated to FrieslandCampina higher management, including the Executive Board, the Presidents of relevant Business Groups and Managing Directors of relevant Operating Companies and Staff Departments.

Corporate e-learnings, training material and guidance documents are available to ensure uniform application of this Policy throughout FrieslandCampina. Corporate Regulatory Affairs trains Topic leaders and local Regulatory Affairs managers, who then ensure that relevant FrieslandCampina employees

within their business entity receive training (train-the-trainer approach). Training and knowledge testing are part of the induction programme of new FrieslandCampina employees involved in the marketing of covered products.

Country training programmes are conducted in local language to effectively reach FrieslandCampina employees on the ground. Corporate training material is translated and adapted, as needed, to ensure appropriate training in each country, taking into account national legislation and local codes. Refresher trainings are conducted at regular intervals, for example to communicate Policy updates.

Retail customers, directly contracted distributors and partners involved in the marketing of covered products are made aware of the Code and the Guiding Principles of this Policy. Directly contracted distributors and partners that market our covered products are trained on the relevant provisions of this Policy, as well as applicable national legislation and local codes, and are informed about relevant Policy updates.

Communication and training activities are monitored and tracked. Records of training attendance and test activities are maintained. Each Operating Company reports annually about training activities.

Monitoring

FrieslandCampina monitors its marketing practices against this Policy and national legislation and local code implementing the Code. Our monitoring system includes:

Internal monitoring

As part of internal auditing, each Operating Company conducts a yearly self-assessment to assess compliance of its own activities and processes with the relevant provisions of this Policy. The outcome of the self-assessment is reported to the Managing Director of the respective Operating Company, the President of the relevant Business Group and Corporate Regulatory Affairs. Confirmed non-compliances are followed up.

During their day-to-day work, marketing and sales employees at the Operating Companies conduct routine monitoring to assess the compliance of selected retail outlets and major e-commerce platforms.

FrieslandCampina's Corporate Internal Audit function reviews adherence to our Policy for Operating Companies that sell FrieslandCampina foods for infants and young children. These reviews are conducted independently and objectively, incorporating the Policy's requirements into a standardized program applied company-wide.

External audits

External audits are undertaken by independent third-party auditors. Qualified, knowledgeable experts experienced in Code auditing are engaged to undertake regularly audits in FrieslandCampina Operating Companies selling foods for infants and young children. The audit plan, which includes location, timing, and extent of work to be conducted, is proposed by Corporate Regulatory Affairs, and approved by the Managing Director of the respective Operating Company and the President of the relevant Business Group.

Documents that can certify compliance with this Policy are collected and kept. Operating Companies maintain records of marketing activities and other material to be able to show compliance during audits, when requested.

The audit report contains non-compliances, opportunities for improvement, areas of risk and well managed compliant practices observed during the audit. The report also contains the corrective action plan for non-compliances developed by the audited Operating Company. The Operating Company ensures follow up and implementation of the corrective action plan.

The findings of the external audits are reported to the Managing Director of the audited Operating Company and the President of the relevant Business Group. A verification statement is prepared by the independent third-party auditor on the external audits that took place during the same year.

External verifications

Our Policy's Guiding principles and management system, as well as local marketing practices in selected countries, are regularly assessed by independent stakeholders such as the Access to Nutrition Initiative (ATNI). ATNI evaluates and ranks the largest infant food manufacturers in their breast milk substitutes index. FrieslandCampina collaborates with ATNI to provide all necessary information for their independent assessment.

Allegations handling

Concerns about potential non-compliances with this Policy, national legislation and/or local codes related to the marketing of covered products, as well as employee behavior suspected of not aligning with this Policy can be raised by any person, including FrieslandCampina employees. FrieslandCampina employees who notice or believe that there has been a breach of this Policy have the responsibility to report it as soon as possible. Any concern that is raised in good faith will not result in retaliation or unfair treatment.

Compliance complaints can be raised openly or anonymously to FrieslandCampina directly and/or indirectly via the Speak Up Phone and Webservice. Depending on the mode of reporting, the source and the potential impact of the compliance complaint, different processes are in place in order to report, investigate and respond to the compliance complaint. Compliance complaints are handled locally by the Operating Company or globally via the Alert system or the Speak Up system. Compliance complaints received from individual consumers are always handled locally. The allegations handling is documented, and the outcome recorded regardless of whether the allegation is substantiated or not. Appropriate corrective actions shall be taken when non-compliances have been confirmed.

Alert system

Complaints with global impact are handled via the Alert system of Corporate Regulatory Affairs, with the involvement of the Operating Company. A formal response about the outcome of the investigation and the decisions taken is given to the complainant within a reasonable timeframe, depending on number and type of complaints raised.

Compliance complaints and suspected misbehavior are recorded in a specific database maintained by Corporate Regulatory Affairs. The database captures information relevant for the assessment and outcome, regardless of whether the allegation is substantiated or not.

If an allegation is confirmed, management of the concerned Operating Company defines, together with Corporate Regulatory Affairs, the measures to be taken, including appropriate corrective actions. The corrective action plan and evidence of its implementation are added to the database; only then can a confirmed non-compliance be closed out.

Speak Up system

Compliance complaints raised openly or anonymously by FrieslandCampina employees or by external stakeholders via the Speak Up Phone and Webservice ([Speak Up | FrieslandCampina](#) available non-stop in all languages) are handled by Ethics & Compliance.

Ethics & Compliance will screen each report in accordance with the FrieslandCampina Investigation procedure to determine whether there is a reasonable suspicion of a violation of our Code of Good Business Conduct called 'Compass'. For all possible Compass violations and for any complaint raised anonymously, Ethics & Compliance leads the investigation and consults Corporate Regulatory Affairs for aspects related to the marketing of infant foods. Compliance complaints related to the marketing of infant foods that are excluded from the 'Compass' investigation procedure are allocated to Corporate Regulatory Affairs for follow up via the Alert system.

In any case, the complainant will be informed about the outcome of the investigation and the decisions taken to the extent this does not conflict with the confidentiality of the case or the privacy and legal rights of the persons involved.

Disciplinary measures

If a reported compliance complaint and/or suspected misbehavior is partly or fully well-founded, management defines the appropriate measures to be taken to the extent permitted by law. These measures can be disciplinary measures against certain persons in line with the FrieslandCampina Policy on Disciplinary Measures and/or organizational measures to prevent re-occurrence. Depending on the severity and regularity of the non-compliance, disciplinary measures can range from a written warning to change in job responsibility, suspension, dismissal or legal actions.

Reporting

Internal reporting

Internal reporting ensures accountability, increases knowledge and raises awareness within the business. Corporate Regulatory Affairs regularly reports to the Executive Board and the Presidents of the relevant Business Groups, the Managing Directors of Operating Companies and relevant Staff Departments, Topic Leaders and local Regulatory/Legal Affairs managers on the application of this Policy, the compliance of our marketing practices and the effectiveness of our management system.

Annual compliance status report

On an annual basis, an external compliance status report is prepared by Corporate Regulatory Affairs and published on the FrieslandCampina corporate website. The annual report is prepared with findings from the global monitoring programme and information provided by the Operating Companies. This report includes:

- Summary of internal verifications and external audits conducted during the last year
- Summary of compliance complaints reported from all sources
- Summary of reported non-compliances (both internal & external) including nature and corrective actions proposed and/or taken
- Summary of training activities during the last year
- Recommendations to address any shortcomings and/or deficiencies in compliance and the effectiveness of our management system
- External position papers and disclosure

External reports are reviewed and approved by the Executive Board and the Presidents of the relevant Business Groups prior to publication and shared with the higher management and within the business.

Continuous improvement

Corrective action plans

When non-compliances have been observed, corrective actions plans are developed and implemented by the relevant Operating Company. Guidelines on developing a corrective action plan are available to support the root cause analysis, the development and execution of corrective actions and setting a timeline for the implementation. Corrective action plans are verified for proper implementation and closure during subsequent assessment.

It is the responsibility of the Operating Company to ensure that concerned FrieslandCampina employees are aware of the corrective action plan and the necessary actions. Directly contracted distributors and partners involved in the marketing of covered products are informed about corrective actions that concern their activities and are required to take appropriate actions to the extent permitted by law. When non-compliant behaviour is observed by a third party not directly contracted by FrieslandCampina, our ability to influence is limited. However, we communicate the relevant provisions of our Policy, encourage compliance, and promote appropriate corrective actions to the extent permitted by law.

Information about corrective action plans, implementation timelines and performance are provided by the Operating Company and monitored within the specific database of Corporate Regulatory Affairs.

Integrate learnings

Corporate Regulatory Affairs regularly reviews and, where necessary, updates this Policy to enhance our marketing practices and management procedures. Non-compliances observed in internal verifications and external audits, as well as confirmed non-compliances reported via the Alert system and/or Speak Up system, are analyzed in order to identify improvement opportunities for both marketing practices and management processes. Relevant developments in the external environment and findings from external stakeholders assessing the Policy's alignment with the Code are also considered. These findings are used to improve this Policy. Policy updates are communicated to the relevant stakeholders, and training material is updated accordingly.

Transparent engagement

Stakeholder dialogue

FrieslandCampina seeks to establish and maintain consistent relations with a wide range of external stakeholders, including governments, regulators and legislators, civil society, and others in the business environment, such as peer companies. This is to share our perspective regarding the application and implementation of the Code. FrieslandCampina is committed to engaging and cooperating in formulating efficient rules and laws that improve nutrition and health for infants and young children, provide a supportive environment for breastfeeding, and contribute to creating a level playing field and the right environment for Code compliance.

FrieslandCampina supports national governments, regulators, and legislators, and other authoritative bodies in their efforts to promote breastfeeding and to develop health policies and national standards regarding marketing of breast milk substitutes that are appropriate, practical, and feasible in the social and legislative framework. FrieslandCampina also cooperates with governments in their efforts to monitor the application of the Code.

FrieslandCampina actively participates in discussions and collaborates with peer companies and civil society regarding the application of the Code. FrieslandCampina seeks alignment within trade associations and industry policy groups to ensure that activities are carried out according to the same

high standards. FrieslandCampina strives for a common position in these groups, and if we do not agree, we will make all parties aware of this.

FrieslandCampina responds to findings of external stakeholders assessing the functioning of this Policy and the compliance of our marketing practices in relation to the Code.

Responsible advocacy

FrieslandCampina's advocacy activities, whether direct or through trade associations, are transparent, fact based, and carried in accordance with local legislation, where existing. FrieslandCampina employees involved in the marketing of infant foods who undertake advocacy activities on behalf of FrieslandCampina adhere to the principles outlined in the FrieslandCampina Policy on Responsible Advocacy.

Disclosure

Transparency with consumers and external stakeholders is important to show accountability and build trust. FrieslandCampina makes the following information publicly available on our [corporate website](#):

- Policies, Standards and Guidelines
 - Compass for Good Business Conduct
 - Business Practices for Business Partners
 - Doing Honest Business Policy
 - Policy for the Marketing of Infant Foods
 - Ten Guiding Principles for Compliance (related to our Policy for the Marketing of Infant Foods)
 - Policy on Responsible Advocacy
 - Stakeholder Dialogue Policy
- Compliance reports
 - Annual FrieslandCampina compliance status reports
 - Audit assurance statements by independent certification agency
- External positions and advocacy papers
- Stakeholder engagement overview
 - List of trade associations and memberships, including those related to infant foods, as well as other collaborations and partnerships
 - Stakeholder Dialogue Table

Annex 1: Definitions

Below definitions are applicable in relation to this Policy. When a term is defined in this Annex as well as in the Code (in Article 3 of the Code), the definitions of this Annex prevail.

Consumers

Pregnant women, mothers of infants and/or young children and their family members.

Covered products

Covered products are formulas for healthy infants and infants with special medical needs from birth to six months (infant formula and formula for special medical purposes for infants) as well as other products for infants and young children specified in applicable national legislation and local code implementing the Code.

Distributor

A person, corporation or any other legal entity in the public or private sector, external to FrieslandCampina, which is directly contracted for the distribution, marketing and sales of covered products to their own customers (sub- distributors, retailers, pharmacies, hospitals, etc.). Distributors may provide a range of services including import, sales and distribution of covered products, medical sales, key account management and participating in tenders on behalf of FrieslandCampina.

Follow-on formula

Formula intended for use as a liquid part of the weaning diet for infants from six to 12 months.

Formula for special medical purpose for infants

Formula specially processed or formulated and intended for the dietary management of infants from birth to 12 months, intended for exclusive or partial feeding, to be used under medical supervision.

Health care facility

Any facility where health care is provided to pregnant women, new mothers, infants or young children. This includes facilities where health workers provide health care in private practice and retail pharmacies where a registered pharmacist is present.

Health worker

A person providing health care services, whether professional or non-professional, including but not limited to doctors, nurses, midwives, pharmacists, dieticians, nutritionists and voluntary unpaid workers.

Infant

A person from birth to 12 months.

Informational and educational material and equipment

Any written, audio or visual material and equipment, in tangible or digital form, providing factual information, e.g. brochures, leaflets, booklets, educational posters, presentations, CDs, electronic devices, vaccination/health cards, weight/growth charts.

Marketing

Product promotion, distribution, selling, advertising, product public relations and information services (including education) of covered products.

Partner

Any third party directly contracted by and acting on behalf of or in collaboration with FrieslandCampina regarding marketing of covered products (e.g. marketing agencies).