



FrieslandCampina 
nourishing by nature

Compliance Status Report 2025

FrieslandCampina Corporate Policy
for the Marketing of Infant Foods

Contents

About this report	3
Responsible marketing of infant foods and our policy framework	4
Global Application and High Standards	4
Scope of Products Covered	4
Guiding Principles for Compliance	4
Monitoring compliance	5
Implementation and Continuous Improvement	5
Compliance management	5
Raising awareness	6
Public reporting	6
Main activities 2025	7
Policy Review and Update in 2025	8
Follow-up on 2024 recommendations – Progress and learnings in 2025	8
Strengthening third party monitoring and communication	8
Improving monitoring of e-commerce and retail channels	9
Our 2025 Performance	10
Feedback on performance	10
Key figures and achievements	10
External compliance complaints	11
Internal monitoring	11
Internal compliance complaints	11
Compliance complaints handling	11
Self-assessments	11
FrieslandCampina Speak Up	11
Bureau Veritas compliance audit	12
Bureau Veritas audit programme	12
Summary of non-conformances	14
Recommendations for improvement	14
Looking ahead	15



About this report

This Compliance Status Report explains how FrieslandCampina applies its commitment to responsible marketing of infant and young child nutrition in practice. Operating in a sensitive and highly regulated category, we believe that transparency, accountability, and continuous improvement are essential to maintaining trust with parents, caregivers, regulators, and broader society.

The report provides an overview of our compliance performance in 2025. It includes information on complaints and allegations from all sources, the outcomes of internal assessments and independent external audits, and the actions taken to address identified issues. It also highlights progress achieved during the year and areas that continue to require attention.

By publishing this report annually, FrieslandCampina aims to support open dialogue with stakeholders and to demonstrate how we continuously reflect, learn, and strengthen our approach to responsible marketing over time.

Nourishing trust through responsible marketing

A message from Roger Loo, President Specialised Nutrition

“Responsible marketing of infant nutrition is fundamental to how we build trust. Operating in a sensitive and highly regulated category, we remain committed to upholding high standards in how we work and communicate.

In 2025, we strengthened our Policy, enhanced training, and further embedded compliance across our operations. At the same time, we recognise the importance of staying alert to evolving challenges, particularly in complex third party and digital environments. Through transparency and continuous improvement, we are committed to supporting the wellbeing of infants and young children and maintaining the trust of parents and caregivers across all markets.

”

Roger Loo
President Specialized Nutrition



Responsible marketing of infant foods and our policy framework

FrieslandCampina produces foods for people of all ages, including infants and young children. We recognize that marketing in this category requires particular care, given the importance of early-life nutrition and the sensitivity of parental decision making. For this reason, responsible marketing of infant foods remains an important area of attention within our company.

We acknowledge that breastfeeding is the preferred way to nourish infants and that it should be protected and promoted. At the same time, we recognize that there are situations in which breastfeeding is not possible or chosen. In such cases, infant foods have a legitimate role. Our responsibility as a manufacturer lies in ensuring that these products are safe and that information and marketing practices are appropriate, factual, and do not undermine breastfeeding.

FrieslandCampina's Policy for the Marketing of Infant Foods forms the cornerstone of our commitment to responsible and ethical marketing. The Policy sets out the principles and requirements that apply to the marketing of foods

for infants and young children across the company and reflects our views on responsible business conduct. It is aligned with international standards, including the World Health Organization's International Code of Marketing of Breast-milk Substitutes (the WHO Code) and relevant World Health Assembly (WHA) resolutions, as well as applicable local legislation.

Through this Policy, we aim to safeguard and promote breastfeeding, while ensuring that parents and caregivers receive clear, accurate, and science-based information on the appropriate use of infant and young child nutrition products when alternatives are needed. In 2025, responsible marketing continued to be embedded as a core element of FrieslandCampina's governance and sustainability agenda, with the Policy serving as the central framework guiding all marketing practices related to infant and young child nutrition.

Global Application and High Standards

The Policy applies to all FrieslandCampina companies, subsidiaries, and direct business partners involved in the marketing of infant and

young child nutrition products. It establishes a consistent global standard designed to ensure responsible practices across diverse regulatory environments. Where national legislation or local codes implementing the WHO Code impose stricter requirements, FrieslandCampina applies the higher standard. This approach enables transparent, compliant, and ethically sound marketing worldwide.

Scope of Products Covered

At a minimum, the Policy covers infant formula and formula for special medical purposes intended for infants from birth to six months of age. In many markets, the scope is extended to include follow on formula, young child formula, and/or infant cereals, in line with local legislation and applicable codes implementing the WHO Code. This approach ensures that the Policy remains relevant, robust, and locally appropriate, meaning that local marketing practices comply with applicable legislation and codes in each market.

Guiding Principles for Compliance

The Policy is underpinned by ten Guiding Principles for Compliance, which translate the intent and principles of the WHO Code into clear, practical expectations for day to day decision making. These principles provide guidance to employees, distributors, and external partners, promoting responsible communication and safeguarding ethical conduct across all marketing activities.



Monitoring compliance

Responsible marketing requires ongoing attention. Through internal guidelines, monitoring activities, and independent external audits, we review our marketing practices and identify areas where improvements may be needed. This approach is intended to support consistent application of our Policy and to provide transparency on how we manage compliance in a complex and sensitive area.

Implementation and Continuous Improvement

Implementation of the Policy is supported by FrieslandCampina's Compliance Management System, which ensures consistent processes, structured monitoring, and harmonized application of requirements across markets. This system reinforces accountability, fosters a culture of responsibility, and supports continuous improvement, enabling the organization to remain responsive to evolving regulatory requirements, societal expectations, and developments in infant and young child nutrition.

Compliance management

Our Compliance Management System integrates governance, training, monitoring, reporting, and stakeholder engagement into a structured approach that supports consistent implementation of our Policy. Together, these elements enable transparency, accountability, and continuous improvement across our operations.



Raising awareness

FrieslandCampina maintains a comprehensive company wide training programme on the responsible marketing of infant foods, applicable at both global and local level. Training is provided to employees, distributors, and relevant partners to ensure they understand and apply the requirements of the Policy, including the principles of responsible marketing and the importance of protecting breastfeeding. In addition to locally delivered trainings that reflect national contexts, several global e learning modules are available in multiple languages.

Global e learning programme on the marketing of infant foods

Foundation: Basic global e learning

- Covers the WHO Code and FrieslandCampina's Policy
- Introduces the ten Guiding Principles for compliance
- Mandatory for all employees, including senior management

Application: Advanced global e learning

- Focuses on applying the ten Guiding Principles in practice
- Uses realistic marketing, communication, and sales scenarios
- Designed for employees in marketing, communication, and sales roles



Public reporting

We demonstrate our dedication to transparency by publishing essential compliance documents on our [corporate website](#). This includes the annual compliance status report detailing monitoring outcomes and Bureau Veritas' assurance statements from the compliance audits.

Main activities 2025

In 2025, FrieslandCampina continued to embed responsible marketing through a combination of transparency, policy development, training, monitoring, and internal and external assurance activities. The main activities undertaken during the year are outlined below.

Public engagement

Activity	Description
Public reporting	Publication of the 2024 Compliance Status Report on FrieslandCampina's website, supporting transparency towards external stakeholders.
External audit disclosure	Public availability of independent Bureau Veritas assurance statements for Greece and Malaysia.
Industry engagement	Ongoing engagement on responsible marketing through relevant trade associations and industry platforms.

Enhancing compliance

Activity	Description
Policy review and update	Completion of a comprehensive review and update of the Corporate Policy for the Marketing of Infant Foods.
Global policy roll out	Roll out of the revised Policy across all OpCo's, supported by updated guidelines.
Training and refreshers	Delivery of training and refresher sessions to reinforce awareness and day to day compliance.

Monitoring and reporting

Activity	Description
OpCo self-assessments	Conduct of self assessments by OpCo's to evaluate local implementation of the Policy.
External compliance audits	Independent compliance audits conducted in Indonesia and Nigeria.
Internal governance reporting	Reporting on compliance developments and audit outcomes to internal governance bodies, including the Executive Board.

Policy Review and Update in 2025

In 2025, FrieslandCampina conducted a comprehensive review and update of its Corporate Policy for the Marketing of Infant Foods, following the previous revision in 2021. This review was informed by a fit-for-purpose assessment that considered developments in the external environment, including evolving guidance from international bodies such as the WHO and Codex Alimentarius, recommendations from Access to Nutrition Initiative (ATNI), developments in market conditions, and insights gained from external compliance audits and internal assessments.

The update aimed to strengthen the clarity, consistency, and practical applicability of the Policy, while maintaining alignment with the spirit and intent of the WHO Code. Particular attention was given to addressing areas where additional clarification or reinforcement was needed to support effective and responsible implementation in diverse contexts. The revised Policy was successfully launched and rolled out across all Operating Companies (OpCo's), supported by updated guidelines and refreshed training programmes for employees and distributors in relevant roles. This global implementation reinforced a harmonized understanding of requirements, enhanced day to day compliance, and supported responsible marketing practices across diverse regulatory and market contexts.

Follow-up on 2024 recommendations – Progress and learnings in 2025

In 2025, FrieslandCampina took concrete steps to follow up on the recommendations and improvement areas identified in the 2024 Compliance Status Report, which focused on rolling out the revised Policy, updating guidance and training materials, strengthening third party monitoring and communication, continuing refresher training, and improving monitoring of e-commerce and retail channels.

A key milestone was the successful launch and roll out of the revised Corporate Policy for the Marketing of Infant Foods across all OpCo's. This roll out was supported by updated internal guidelines and refreshed training programmes, made available in multiple languages, ensuring that employees involved in marketing and sales had a clear understanding of the revised standards. Refresher training sessions were conducted throughout the year, contributing to sustained awareness and reinforcing day to day compliance practices. In the second half of 2025, we initiated an update of the global e learning programme to align its content with the revised Policy published in 2025, ensuring continued relevance and consistency of training materials.

Progress was also made in addressing areas related to third-party monitoring and communication and the monitoring of e-commerce and retail channels, that are recognised as more complex and therefore require sustained effort over time.

Strengthening third party monitoring and communication

Complaints in recent years, including in 2025, continued to indicate that marketing activities by non contracted third parties—such as independent retailers or online sellers—remain a risk area. OpCo's took steps to increase communication and engagement with these parties to raise awareness of FrieslandCampina's Policy and commitments. However, feedback from 2025, including from external compliance audits, confirmed that encouraging desired behaviour in the absence of formal control mechanisms remains challenging. As a result, this area remains a focus for continued improvement, with emphasis on raising awareness, sharing effective practices across markets, and strengthening preventive and responsive measures within existing constraints.

Improving monitoring of e-commerce and retail channels

Monitoring of e-commerce platforms and physical retail environments continued throughout 2025, and was further developed in some markets. Nonetheless, approaches varied between OpCo's and were not yet fully embedded in a consistent and structural way. External audit feedback and internal learnings highlighted the need for greater consistency in monitoring methods and follow up to ensure that identified non-conformances translate into effective corrective actions. Further strengthening this area remains an important focus to enhance oversight and improve compliance outcomes.

Taken together, the follow up on the 2024 recommendations demonstrates solid progress in policy implementation, training, and awareness raising, while also reinforcing the importance of sustained effort and continuous improvement in areas where complexity and risk remain higher.



Our 2025 Performance

FrieslandCampina's compliance performance in 2025 is outlined below, highlighting key results, identified non-conformances, and insights from internal monitoring and external audits.

Key figures and achievements

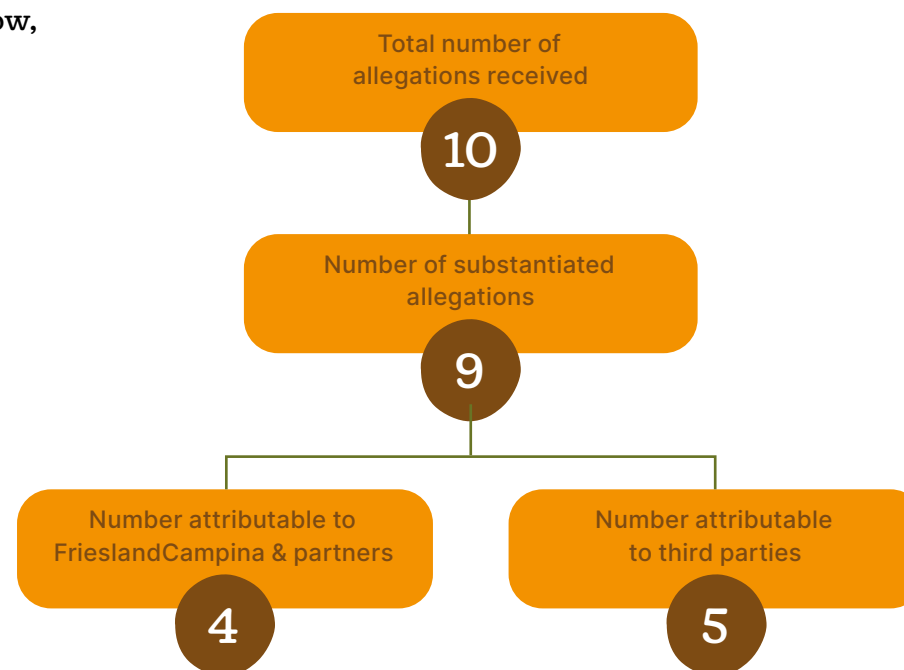
- 5196 employees, partner staff and distributor personnel were trained locally.
- 1367 and 1087 employees completed the basic and advanced global e-learning, respectively.
- No compliance complaints were received via our Speak Up system.
- 9 non-conformances were observed in 4 countries in total.

What kind of non-conformances were observed?

Promotion to the general public	6	
Interaction with health workers	2	
Persons employed by distributors & partners	0	
Internal organisation	1	

How were the non-conformance observed?

External compliance complaints	2	
Bureau Veritas audit	3	
Internal monitoring	4	
Speak Up	0	



Feedback on performance

There are different ways on how we receive feedback on our performance.

Internal Feedback

- Self-assessments conducted by each OpCo
- Monitoring through internal programs like "Speak Up" and the corporate alert system

External Feedback

- Compliance complaints received from external parties
- Audits conducted by independent third-party auditors

Each of these feedback mechanisms play a crucial role in maintaining high standards and improving the overall performance of our organization.

External compliance complaints

In 2025, one OpCo received three compliance complaints: one from a local government agency and two from competitors. Two complaints were confirmed to be valid, pertaining to a price promotion of a covered product to consumers initiated by a retailer and a social media posting referring to a covered product. In response to both verified complaints, root cause analyses were carried out and corrective measures were taken, which involved corrections to cease the price promotion and to remove the social media posting. Corrective actions were taken by communicating with the third party retailer about the provisions of the Policy. In addition, employees received reminders of the Policy and Guidelines to prevent recurrence.

Compliance complaints handling

FrieslandCampina has established a standardized procedure for addressing complaints from external sources. This process includes a decision tree to ensure comprehensive evaluation and action on all reported issues. Substantiated complaints are managed locally by the relevant OpCo or globally if they impact multiple entities, using the FrieslandCampina corporate alert system. Additionally, all external complaints are recorded in the corporate compliance database to maintain oversight and ensure accountability and follow-up.

Internal monitoring

In 2025, all OpCo's active in the marketing and sales of infant foods completed the annual self assessments, with the exception of Nigeria, where efforts were dedicated to the preparation for the external compliance audit. These assessments identified a total of four non conformances across two OpCo's. One non-conformance related to the promotion of covered products to the general public. One concerned internal processes, specifically the absence of regular monitoring of major (online) retailers outside the OpCo's control, with engagement taking place only after a non compliance was identified. The remaining two non conformances related to interactions with healthcare professionals: one involving the promotion of covered products to consumers within healthcare facilities, and one concerning the absence of written confirmation from healthcare professionals acknowledging receipt of products for professional evaluation.

Self-assessments

We recognize the importance of monitoring our marketing practices. Our Policy requires each OpCo to conduct an annual self-assessment to ensure their activities and processes align with our Policy. This reflective practice is essential for continuous improvement and maintaining compliance in our marketing efforts.

Internal compliance complaints

In 2025, no compliance complaints concerning our infant food marketing practices were received through Speak Up.

FrieslandCampina Speak Up

FrieslandCampina offers a platform called Speak Up for stakeholders and employees to raise concerns when our actions are not in line with the FrieslandCampina Business Practices, Compass, or applicable laws. This includes compliance issues related to our Policy for the Marketing Infant Foods and adherence to national legislation or local codes implementing the WHO Code. The service ensures confidentiality and is accessible 24/7 in multiple languages, allowing for both open and anonymous submissions of complaints.

Bureau Veritas compliance audit

In 2025, Bureau Veritas has carried out compliance audits in Indonesia and Nigeria. Interviews with FrieslandCampina employees and distributor staff responsible for sales and marketing were done. Assessments of e-commerce and visits of retail stores were carried out. In Nigeria, health care facilities were visually assessed, whereas no such assessments were conducted in Indonesia due to the OpCo's limited medical marketing activities.

For both OpCo's the level of awareness and competence with respect to our Policy and local legislation appeared very high across interviewed FrieslandCampina and distributor personnel. The number of non-conformances is very low and comparable to the previous external compliance audits, both conducted in 2021. For Indonesia one non-conformance has been observed and for Nigeria two non-conformances in different areas. Several opportunities for improvement and several areas of risk have been identified for both OpCo's. Root cause analyses have been carried out and corrective action plans have been developed and implemented.

Assurance statements from the Bureau Veritas compliance audits that took place in Indonesia and Nigeria in 2025 are available on our corporate website. The statements contain a summary of the non-conformances and opportunities for improvement for each of the OpCo's audited.

Bureau Veritas audit programme

Since 2014, we have implemented a corporate audit program that engages the external auditing firm Bureau Veritas to independently evaluate the compliance of our infant foods business with the Policy. These external compliance audits are a crucial part of our compliance program, conducted regularly across our OpCos that sell foods for infants and young children. The audits help raise awareness about the importance of adhering to our Policy and to identify deviating practices that need to be addressed. Additionally, the involvement of independent third-party auditors provides an objective perspective on our marketing practices, reflecting how they might be perceived externally.



Indonesia

Non-conformance	Corrective action plan
In a review of four e commerce platforms price discount promotions were observed on approximately 15% of the sampled covered product offers across two platforms. Both platforms were accessible via links on the Frisian Flag website, and it was noted that the OpCo maintains a trade agreement with one of these online marketplaces. These promotional activities were assessed as a non conformance with the Local Code as applicable to marketplace practices. There was no evidence to suggest that these price reduction promotions were placed at the request of the OpCo.	WHO Code requirements were communicated to the e commerce platform but not fully cascaded to individual marketplace sellers. The OpCo has issued written notifications to the relevant sellers to reinforce WHO Code compliance requirements.

Nigeria

Non-conformance	Corrective action plan
A review of eight e commerce websites identified non compliances with the Policy and local Code. Two instances of price promotion were observed across two separate websites. In addition, three instances of perceived promotional language use were identified on three different websites, including likening or comparing covered products to breastmilk. These promotional activities represent a non compliance with the Local Code. There was no evidence of involvement by the OpCo in these activities, and it was confirmed that the OpCo has no direct or indirect commercial relationship with the e commerce platforms concerned.	The OpCo has no direct or indirect relationship with the e commerce platforms identified. Non compliant activities occurred on third party and informal platforms operating in a largely unregulated market environment. The OpCo will strengthen and monitor quarterly e commerce scans and engage identified platform owners to communicate about the provisions of the Policy and adherence to the local Code.
A review of the labels of all covered products sold by the OpCo in Nigeria found that, for customer support purposes, contact details (telephone number and email address) were included on all product labels. This was assessed as not aligning with the requirements stipulated under Nigerian law. While regulatory approvals and required product registrations (certificates) were confirmed on a sample basis, no documentation was available to support an alternative interpretation of the local Code. Consequently, the labelling practice was considered non compliant with the Local Code.	The OpCo applied an interpretation permitted by the local regulator, allowing the inclusion of manufacturer contact details on labels for consumer complaint handling. Product labels were revised and have been submitted for the regulator's approval.

Summary of non-conformances

In 2025, a total of nine non conformances were identified. Two resulted from external compliance complaints received at local level, four were identified through internal self assessments, and three were identified through external compliance audits. The majority of the non conformances (six) related to promotion to the general public. One non conformance concerned internal processes, and two non-conformances related to interaction with health care professionals. Corrective actions have been defined for all identified issues.

Five of the nine substantiated non conformances were attributable to activities initiated by third parties. The number of non conformances identified during the Bureau Veritas compliance audits in Indonesia and Nigeria was comparable to findings from previous audits in those OpCo's. Similarly, the internal self assessments conducted by OpCo's reported a comparable number of findings compared to the previous year. No reports were submitted through the Speak Up system.

Recommendations for improvement

Building on the progress achieved in 2025 and the insights gained from monitoring, self assessments, and external audits, the following recommendations are identified to further strengthen FrieslandCampina's marketing compliance framework:

- **Improve the structural monitoring of e commerce platforms and physical retail environments involving contracted partners**, with continued focus on consistency, follow up, and effective remediation across markets.
- **Enhance local OpCo self assessments and improve process consistency**, strengthening their role in identifying risks, capturing insights, and supporting both local action and corporate oversight.
- **Facilitate cross OpCo sharing of best practices**, particularly in relation to online and retail monitoring, to support learning, alignment, and more effective compliance outcomes across markets.
- **Further strengthen communication and engagement on non contracted third party activities**, recognising that encouraging desired behaviour without formal control remains complex and requires sustained attention, learning, and escalation where needed.

Looking ahead

At FrieslandCampina, we remain committed to ensuring that the marketing of infant and young child nutrition is conducted responsibly, transparently, and in line with both international standards and societal expectations.

The findings of this 2025 Compliance Status Report confirm that important progress has been made, particularly through the revision and global implementation of our Corporate Policy, strengthened training programmes, and continued monitoring and reporting activities. At the same time, they reaffirm that marketing compliance in this category requires ongoing vigilance and continuous adaptation to an evolving environment.

Looking ahead, FrieslandCampina will continue to build on the foundations of its Compliance Management System, with a focus on further strengthening consistency and effectiveness across OpCo's. Particular attention will remain on areas that are inherently more complex, such as monitoring activities in e commerce and physical retail environments, as well as engagement with third parties. In these areas, progress will continue to depend on a combination of monitoring, communication, and the sharing of practical experiences across markets.

The experience of 2025 also confirms the importance of maintaining a strong focus on internal learning processes. Self assessments, internal monitoring, and external audits will continue to play an important role in identifying risks and informing further improvements, while cross market exchange of insights can support more consistent application of the Policy.

Transparency will remain an integral part of our approach. By continuing to report on our compliance performance and share key findings and developments, FrieslandCampina aims to contribute to ongoing dialogue with stakeholders and to maintain accountability for its marketing practices.

Through these efforts, FrieslandCampina aims to further strengthen responsible marketing practices and contribute positively to the health, well being, and trust of the families we serve, today and in the future.



www.frieslandcampina.com