

WHO CODE		DANONE BMS POLICY	
<b>Article 1</b> <b>Aim of the Code</b>	<p>The aim of this Code is to contribute to the provision of safe and adequate nutrition for infants, by the protection and promotion of breast-feeding, 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.</p>	<b>Purpose</b>	<p>This BMS Policy supports Danone’s mission “to bring health through food to as many people as possible”. It does this by ensuring Danone contributes to the provision of safe and adequate nutrition for infants, by protecting and promoting breast-feeding, 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 practices.</p> <p>The intention of this BMS Policy IS NOT to interpret or replace the WHO Code, but to provide instructions and guidance when undertaking Marketing activities on Breast-Milk Substitutes.</p>
<b>Article 2</b> <b>Scope of the Code</b>	<p>The Code applies to the marketing, and practices related thereto, of the following products: breast-milk substitutes, including infant formula; other milk products, foods and beverages, including bottled complementary foods, when marketed or otherwise represented to be suitable, with or without modification, for use as a partial or total replacement of breast milk; feeding bottles and teasts. It also applies to their quality and availability, and to information concerning their use.</p>	<b>Scope</b>	<p>This BMS Policy applies to Employees of all Danone Entities and to Partners involved in the Marketing, distribution, selling, education and/or governance of Covered Products. Danone ensures Partners understand and are made aware of the importance of abiding by this BMS Policy during all collaborations with, or on behalf of, Danone.</p> <p>This BMS Policy applies worldwide to the Marketing of Covered Products*.</p> <p>* Please see Appendix 2: Definitions below.</p>

<b>Article 3 Definitions</b>	For the purposes of this Code:  "Breast-milk substitute" means any food being marketed or otherwise presented as a partial or total replacement for breast milk, whether or not suitable for that purpose.	<b>Appendix 2: Definitions</b>	Breast-milk Substitute means any food being marketed or otherwise presented as a partial or total replacement for breast-milk, whether or not suitable for that purpose.
	"Complementary food" means any food whether manufactured or locally prepared, suitable as a complement to breast milk or to infant formula, when either become insufficient to satisfy the nutritional requirements of the infant. Such food is also commonly called "weaning food" or breast-milk supplement".		Complementary Food means any food suitable as a complement to breast-milk or to Infant Formula or Follow-on Formula when either becomes insufficient to satisfy the nutritional requirements of the infant. Complementary Foods are not considered to be Breast-Milk Substitutes if they are not marketed as such but are intended to and are marketed to complement, rather than replace, breast-milk or Infant Formula.
	"Container" means any form of packaging of products for sale as a normal retail unit, including wrappers.		NA
	"Distributor" means a person, corporation or any other entity in the public or private sector engaged in the business (whether directly or indirectly) of marketing at the wholesale or retail level a product within the scope of this Code. A "primary distributor" is a manufacturer's sales agent, representative, national distributor or broker.		Distributor means a legal entity external to Danone, in the public or private sector, who is warehousing, distributing/reselling Danone's products to their own customers (sub-distributors, retailers, pharmacies, hospitals). Distributors may provide a wide range of services including importing, promoting/Marketing Covered Products, medical sales, key account management, and participation in tenders on Danone's behalf.

	<p>"Health care system" means governmental, nongovernmental or private institutions or organizations engaged, directly or indirectly, in health care for mothers, infants and pregnant women; and nurseries or child-care institutions. It also includes health workers in private practice. For the purposes of this Code, the health care system does not include pharmacies or other established sales outlets.</p>		<p>Health Care System (HCS) means the Health Care System that includes HCPs, HCOs and POs.</p>
	<p>"Health worker" means a person working in a component of such a health care system, whether professional or non-professional, including voluntary unpaid workers.</p>		<p>Health Worker means a person providing health services in a HCO, whether professional or non-professional, including but not limited to, HCPs, voluntary, unpaid workers.</p>
	<p>"Infant formula" means a breast-milk substitute formulated industrially in accordance with applicable Codex Alimentarius standards, to satisfy the normal nutritional requirements of infants up to between four and six months of age, and adapted to their physiological characteristics. Infant formula may also be prepared at home, in which case it is described as "home-prepared".</p>		<p>Infant Formula means a Breast-Milk Substitute formulated industrially in accordance with applicable standards, laws and regulations (including Codex Alimentarius Standards, where applicable), to satisfy the normal nutritional requirements of infants up to six months of age, and adapted to their physiological characteristics. Infant Formula may also be prepared at home in which case it is described as "home-prepared".</p>
	<p>"Label" means any tag, brand, marks, pictorial or other descriptive matter, written, printed, stencilled, marked, embossed or impressed on, or attached to, a container (see above)</p>		<p>Label means any written or graphic material printed, marked, embossed or impressed upon or attached to the packaging of a product.</p>

	of any products within the scope of this Code.		
	"Manufacturer" means a corporation or other entity in the public or private sector engaged in the business or function (whether directly or through an agent or through an entity controlled by or under contract with it) of manufacturing a product within the scope of this Code.		Not defined, Danone is considered to be the "Manufacturer".
	"Marketing" means product promotion, distribution, selling, advertising, product public relations, and information services.		Marketing means product promotion, distribution, selling, advertising, product public relations, and information services.
	"Marketing personnel" means any persons whose functions involve the marketing of a product or products coming within the scope of this Code.		NA
	"Samples" means single or small quantities of a product provided without cost.		Sample means single or small quantities of a product provided at no cost to the Health Care Professional and is not intended for sale.
	"Supplies" means quantities of a product provided for use over an extended period, free or at a low price, for social purposes, including those provided to families in need.		NA
	NA		BMS Policy means Danone's Policy for the Marketing of Breast-Milk Substitutes.
	NA		Covered Product means: Worldwide: – Infant Formula (formulated to meet the normal

			<p>nutritional requirements of infants up to the age of six months) and information concerning their use;</p> <ul style="list-style-type: none"> <li>– Any other food or beverage that is presented to be a partial or total replacement for breast-milk, for infants up to six months of age, whether or not suitable for that purpose, and information concerning their use;</li> <li>– Delivery products (such as bottles and teats) and information concerning their use.</li> </ul> <p>Additionally, for Higher Risk Countries:</p> <ul style="list-style-type: none"> <li>• Follow-on Formula (intended for infants from six to twelve months of age) and information concerning their use;</li> <li>• Complementary (weaning) Foods and drinks for use by infants under six months of age.</li> </ul>
	NA		<p>Donation mean financial or in-kind contribution to reflect Danone's social responsibility and help institutions in areas other than research, science or education.</p>

	NA		Employee means any person employed under a permanent or temporary contract or at-will employment with a Danone Entity. For purposes of this BMS Policy, Employee does not include individuals providing services as a consultant or independent contractor or individuals who are employed by another entity, such as agency workers.
	NA		Entity means an entity over which Danone has operational control.
	NA		Excluded Products are those products produced by Danone and intended for use by infants with special medical conditions. These infants have limited, impaired or disturbed capacity to take, digest, absorb, metabolise or excrete breast-milk or certain nutrients contained therein or metabolites, or other medically-determined nutrient requirements, whose dietary management cannot be achieved only by modification of the normal diet alone. These products are specially formulated to be compositionally distinct from Infant Formula intended for healthy infants.
	NA		Follow-on Formula means, for the purpose of this BMS Policy, a formula product intended for, and marketed for, infants from six to twelve months of age.
	NA		Grants are financial or in-kind contributions to an institution in the HCS to support scientific research, advancement of science and education, or patient or

		public education in relation to Covered Products.
	NA	Health Care Organisation (HCO) means any legal person (i) that is a health care, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for Patient Organisations) or (ii) through which one or more Health Worker/s provide services. This could include, for the purposes of this document, for example midwife associations. Pharmacies are not included in the definition of HCO for the purpose of this Policy.
	NA	Healthcare Professional (HCP) means any individual who practices a medical, dental, pharmaceutical, midwifery, dietetic, nutritional or nursing profession or any other person who, in the course of his or her professional activities may prescribe, or purchase, supply, recommend or administer on behalf of a patient, a nutritional product, or provide health care services.
	NA	Higher Risk Countries means those countries that meet either of the following criteria: More than 10 per 1000 (under 5 years of age) mortality rate; More than 2% acute malnutrition (moderate and severe wasting) in children under the age of 5 years.

		A list of Higher Risk Countries is included in Appendix 1.
	NA	Informational and/or Educational Material means any material, whether written, aural, or visual, that provides information about such topics as nutrition, health care, or growth and development of infants, but that is not intended to promote a specific brand of a product.
	NA	Marketing Material means any material, whether written, aural, or visual, related to the sale or purchase of a specific brand of product including, but not limited to, point-of-sale advertising, special displays, Labels, television, radio, internet, social media and print advertisements.
	NA	Partners means any party acting on behalf of Danone, or in collaboration with Danone, regarding Covered Products with whom Danone has a contractual relationship, including but not limited to Distributors, agencies and HCOs.
		PO means “Patient Organisation” which is a not-for-profit organisation (including the umbrella organisations to which they belong) mainly composed of patients and/or caregivers, that represent and/or support the needs or interests of patients and/or caregivers.
	NA	Additional Danone Governance Definitions: See policy. (BMS – CM, CBU, CEO, Cluster, COMEX, Company Policies, EL PCC, ELN,



			EVP, General Counsel SN, GM, HCM, PCB, SN)
<b>Article 4 Information and Education</b>	4.1 Governments should have the responsibility to ensure that objective and consistent information is provided on infant and young child feeding for use by families and those involved in the field of infant and young child nutrition. This responsibility should cover either the planning, provision, design and dissemination of information, or their control.	<b>Article 2 Information and Education</b>	2.1 Danone supports governments in ensuring that objective and consistent information is provided on infant feeding for use by families and those involved in the field of infant nutrition.
	4.2 Informational and educational materials, whether written, audio, or visual, dealing with the feeding of infants and intended to reach pregnant women and mothers of infants and young children, should include clear information on all the following points: (a) the benefits and superiority of breast-feeding; (b) maternal nutrition, and the preparation for and maintenance of breast-feeding; (c) the negative effect on breast-feeding of introducing partial bottle-feeding; (d) the difficulty of reversing the decision not to breast-feed; and (e) where needed, the proper use of infant formula, whether manufactured industrially or home-prepared. When such materials contain information about the use of infant formula, they should include the social and financial implications		2.2 Informational and/or Educational Materials, whether written, audio, or visual, dealing with the feeding of infants and intended to reach pregnant women and mothers of infants, should include the following:  2.2.1 Infant feeding in general “Breast-feeding is the best form of nutrition for babies and provides many benefits to babies and mothers. It is important that, in preparation for and during breast-feeding, you eat a healthy, balanced diet. Combined breast and bottle-feeding in the first weeks of life may reduce the supply of your own breast-milk, and reversing the decision not to breast-feed is difficult. Always consult your Healthcare Professional for advice about feeding your baby. If you use infant formula, you should follow

	<p>of its use; the health hazards of inappropriate foods or feeding methods; and, in particular, the health hazards of unnecessary or improper use of infant formula and other breast-milk substitutes. Such materials should not use any pictures or text which may idealize the use of breast-milk substitutes.</p>		<p>manufacturer's instructions for use carefully."</p> <p>2.2.2 The use of Infant Formula In addition to 2.2.1 the following should also be included "The social and financial implications of using infant formula should be considered. Improper use of an infant formula or inappropriate foods or feeding methods may present a health hazard. If you use infant formula, you should follow the manufacturer's instructions for use carefully – failure to follow the instructions may make your baby ill." Such materials do not use pictures or text elements which idealise the use of Covered Products.</p>
	<p>4.3 Donations of informational or educational equipment or materials by manufacturers or distributors should be made only at the request and with the written approval of the appropriate government authority or within guidelines given by governments for this purpose. Such equipment or materials may bear the donating company's name or logo, but should not refer to a proprietary product that is within the scope of this Code, and should be distributed only through the health care system.</p>		<p>2.3 Provision of Informational and/or Educational Materials, intended for pregnant women and mothers, distributed by Danone for use in a HCO should be provided only at the request and with the written approval of the appropriate authority or institution or within guidelines issued by governments for this purpose. Such material may bear the Company's name or logo, but should not refer to Covered Product brand names or include visual representations of packaging of Covered Products and should be distributed only through the HCO.</p>

<b>Article 5 The General Public and Mothers</b>	5.1 There should be no advertising or other form of promotion to the general public of products within the scope of this Code.	<b>Article 3 General Public and Mothers</b>	3.1 Danone does not advertise or promote Covered Products to the general public.
	5.2 Manufacturers and distributors should not provide, directly or indirectly, to pregnant women, mothers or members of their families, samples of products within the scope of this Code.		3.2 Samples of Covered Products are not distributed to pregnant women, mothers, or members of their families.
	5.3 In conformity with paragraphs 1 and 2 of this Article, there should be no point-of-sale advertising, giving of samples, or any other promotion device to induce sales directly to the consumer at the retail level, such as special displays, discount coupons, premiums, special sales, loss-leaders and tie-in sales, for products within the scope of this Code. This provision should not restrict the establishment of pricing policies and practices intended to provide products at lower prices on a long-term basis.		3.3 Danone does not use point of sale, advertising, sampling or any other promotional devices to induce sales of Covered Products directly to the consumer at retail level. Such practices include but are not limited to: <ul style="list-style-type: none"> <li>- special displays</li> <li>- discount coupons</li> <li>- premiums</li> <li>- special sales</li> <li>- loss-leaders</li> <li>- tie-in sales</li> </ul> This provision does not restrict the establishment of pricing policies and practices intended to provide products at lower prices on a long-term basis.
	5.4 Manufacturers and distributors should not distribute to pregnant women or mothers or infants and young children any gifts of articles or utensils which may promote the use of breast-milk substitutes or bottle-feeding.		3.4 Danone does not distribute any gifts, articles or utensils to pregnant women, or mothers of infants, that may promote the use of Covered Products.
	5.5 Marketing personnel, in their business capacity, should not seek direct or indirect contact of any kind with pregnant women or		3.5 Company personnel involved in the Marketing of infant foods do not solicit direct or indirect contact with pregnant women, or mothers of infants and young

	with mothers of infants and young children.		children, for the purpose of Marketing or promoting Covered Products. This is not intended to prevent trained staff from responding to questions from consumers about Covered Products and other foods intended for infants via, for instance, telephone helplines, websites and social media.
			3.6 All Labels and Informational and/or Educational Materials regarding Covered Products and intended for the general public are science-based, balanced, and accurate, in accordance with this BMS Policy and relevant applicable local laws and regulations.
			3.7 Danone has an internal review process to ensure that all Marketing activities, Marketing Materials, Informational and/or Educational Materials regarding Covered Products are supported by sound science and comply with this BMS Policy and all applicable laws and regulations prior to dissemination.
			3.8 In Higher Risk Countries, Complementary Foods and drinks are not advertised or promoted, for use by infants under six months of age.
<b>Article 6 Health Care Systems</b>	6.1 The health authorities in Member States should take appropriate measures to encourage and protect breast-feeding and promote the principles of this Code, and should give appropriate information and advice to health	<b>Article 4 Health Care Organisations &amp; Article 10 Donations</b>	Addressed to the health care authorities.

	workers in regard to their responsibilities, including the information specified in Article 4.2.		
	6.2 No facility of a health care system should be used for the purpose of promoting infant formula or other products within the scope of this Code. This Code does not, however, preclude the dissemination of information to health professionals as provided in Article 7.2.		4.1 HCOs are not used for the purpose of promoting Covered Products. This does not limit Danone Employees and Partners from disseminating information to HCPs as provided in Clause 5.2 of this BMS Policy.
	6.3 Facilities of health care systems should not be used for the display of products within the scope of this Code, for placards or posters concerning such products, or for the distribution of material provided by a manufacturer or distributor other than that specific it Article 4.3.		4.2 HCOs should not be used for the display of Covered Product, including placards or posters concerning such products, or for the distribution of Covered Product related material other than that specified in Clause 2.3 of this BMS Policy.
	6.4 The use by the health care system of "professional service representatives", "mothercraft nurses" or similar personnel, provided or paid for by manufacturers or distributors, should not be permitted.		4.3 Danone does not provide or pay for "professional service representatives", "mothercraft nurses" or similar personnel, for use by HCOs.
	6.5 Feeding with infant formula, whether manufactured or home-prepared, should be demonstrated only by health workers, or other community workers if necessary; and only to the mothers or family members who need to use it; and the information given should include a clear explanation of the hazards of improper use.		4.4. Company personnel do not take part in the Covered Products' (manufactured or home prepared) feeding demonstrations organised for mothers or family members. Such demonstrations should only be conducted by Health Workers, if necessary; and only to the mothers or family members who need to use Covered Product.

	<p>6.6 Donations or low-price sales to institutions or organizations of supplies of infant formula or other products within the scope of this Code, whether for use in the institutions or for distribution outside them, may be made. Such supplies should only be used or distributed for infants who have to be fed on breast-milk substitutes. If these supplies are distributed for use outside the institutions, this should be done only by the institutions or organizations concerned. Such donations or low-price sales should not be used by manufacturers or distributors as a sales inducement.</p>	<p>4.6 All supplies of Covered Products, other than Donations, to HCOs are provided in quantities determined to be reasonable and on the basis of an unsolicited written request of a HCO, in accordance with a transparent and established procurement process. These products are only intended for primary use at the requesting HCO by infants who, pursuant to medical advice, must be fed with Covered Products during their stay at the facility.</p> <p>4.7 Supplies of Covered Products to HCOs are not provided as an incentive to Health Workers, nor are they accompanied by other incentives, to purchase or use a particular brand of Covered Products or to purchase or use other products offered by Danone, whether or not those other products are covered under the scope of this BMS Policy.</p> <p>4.8 Danone keeps full records of requests detailing supplies of Covered Products to HCOs.</p> <p>10.1 Danone may provide Donations of Covered Products to reflect its social responsibility commitments, including in emergency and disaster situations through government channels or internationally recognised aid agencies and only in response to a specific written request (clearly detailing the medical and social grounds</p>
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		<p>for the request) from the government or appropriate aid agency. Danone delivers Donations of Covered Products to the requesting government or aid agency for distribution amongst infants who, pursuant to medical advice, have to be fed with Covered Products and for whom breastfeeding is not feasible. Danone does not deliver Donations of Covered Products directly to parents.</p> <p>10.2 Requests may be made from orphanages or other social welfare institutions for Donations of Covered Products for infants who have to be fed with Covered Products and for whom breastfeeding is not feasible. Danone will only respond to written requests with a signature from the appropriate official within the institution. Each request will be assessed on a case by case basis and (a) the product supplied must match the amount of product specified, and (b) be in accordance with any local laws and regulations.</p> <p>10.3 The Label or packaging of Covered Products distributed as Donations must clearly indicate that the product is a “donation – not for sale” for use by the receiving institution or organisation, and only for infants who need to be fed with Covered Products and for whom breastfeeding is not feasible [...]</p>
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	<p>6.7 Where donated supplies of infant formula or other products within the scope of this Code are distributed outside an institution, the institution or organization should take steps to ensure that supplies can be continued as long as the infants concerned need them. Donors, as well as institutions or organizations concerned, should bear in mind this responsibility.</p>		<p>10.3 [...] As a donor, we are conscious of our responsibility for the continuous supply of such product(s).</p>
	<p>6.8 Equipment and materials, in addition to those referred to in Article 4.3, donated to a health care system may bear a company's name or logo, but should not refer to any proprietary product within the scope of this Code.</p>		<p>4.5 If allowed under local laws and regulations and consistent with Company Policies, Danone may donate practice-related equipment or materials to HCOs for use by Health Workers in addition to those referenced in Clause 2.3 of this BMS Policy. These items do not carry Covered Product (or Danone services) brand names or logos, but may carry the Company's name or logo.</p>
<b>Article 7 Health Workers</b>	<p>7.1 Health workers should encourage and protect breast-feeding; and those who are concerned in particular with maternal and infant nutrition should make themselves familiar with their responsibilities under this Code, including the information specified in Article 4.2.</p>	<b>Article 5 Health Workers &amp; Article 6 Product for Professional Evaluation</b>	<p>5.1 Danone seeks to ensure Health Workers are familiar with all their responsibilities under the WHO Code.</p>
	<p>7.2 Information provided by manufacturers and distributors to health professionals regarding products within the scope of this Code should be restricted to scientific and</p>		<p>5.2 Danone may provide Health Workers with information on Covered Products and bottle feeding, including specific product information, as long as it is scientific, factual and</p>



	<p>factual matters, and such information should not imply or create a belief that bottlefeeding is equivalent or superior to breast-feeding. It should also include the information specified in Article 4.2.</p>		<p>properly referenced. Such material should not imply or create the belief that Covered Product is equivalent or superior to breast-feeding. These materials must include the information specified in Clause 2.2 of this BMS Policy and bear the following statement "For Health Worker use only - not for distribution to the general public".</p>
	<p>7.3. No financial or material inducements to promote products within the scope of this Code should be offered by manufacturers or distributors to health workers or members of their families, nor should these be accepted by health workers or members of their families.</p>		<p>5.3 No gifts, benefit-in-kind, financial, material or other inducements/advantages are offered to Health Workers or their families as an inducement for the supply, recommendation or sale of Covered Products or for the purpose of promoting Covered Products.</p>
			<p>5.4 If allowed under local laws and regulations, and consistent with Company Policies, an inexpensive gift unrelated to the Health Worker's practice can be given on an infrequent basis in acknowledgment of significant national, cultural or religious events, provided such items do not display Covered Products' (or Danone services') brand names or logos.</p>
			<p>5.6 If allowed under local laws and regulations, Danone may contract HCPs, through their affiliated HCO, for the provision of legitimate, professional services (such as speeches, market research, medical consultancy, input to clinical studies etc.) against a fee at</p>

		<p>fair market value. In contracting a HCP through their affiliated HCO, we use selection criteria that we can explain in good faith and that ensure the appropriate service quality for our needs. We do not influence or reward a HCP's decision, advice or professional or business conduct in general, in consideration of the award of a contract.</p>
	<p>7.4 Samples of infant formula or other products within the scope of this Code, or of equipment or utensils for their preparation or use, should not be provided to health workers except when necessary for the purpose of professional evaluation or research at the institutional level. Health workers should not give samples of infant formula to pregnant women, mothers of infants and young children, or members of their families.</p>	<p>3.2 Samples of Covered Products are not distributed to pregnant women, mothers, or members of their families.</p> <p>Product for Professional Evaluation</p> <p>6.2 PPE of Covered Product and or equipment/utensils for Covered Product preparation is only provided specifically for the purpose of professional evaluation or research at an institutional level.</p>
		<p>6.1 Danone may only provide PPE of Covered Product to HCP.</p>
		<p>6.3 PPE may only be supplied to a HCP for:</p> <ul style="list-style-type: none"> <li>– The introduction of a new product or new product packaging/labelling</li> <li>– The introduction of a new formulation/recipe of an existing product, or</li> <li>– The introduction of our range of products</li> </ul>

			to a new or recently qualified HCP.
			<p>6.4 In such cases a maximum of two units of Covered Products may be given to the HCP, provided a written receipt (confirmation) is completed by the HCP and provided to Danone. The receipt should clearly state the HCP certification that:</p> <ul style="list-style-type: none"> <li>– The PPE is solely for the purposes of professional evaluation,</li> <li>– The HCP understands and is aware of the obligations set forth under the relevant local laws and regulations and the WHO Code, and</li> <li>– The PPE is not being provided as an incentive to purchase, resell or recommend a particular brand of Covered Product.</li> </ul>
			6.5 The PPE should bear a Label stating that it is “For Professional Evaluation Only” and “Not for Sale”.
	7.5 Manufacturers and distributors of products within the scope of this Code should disclose to the institution to which a recipient health worker is affiliated any contribution made to him or on his behalf for fellowships, study tours, research grants, attendance at		5.5 In order to facilitate continuing professional development and training, and subject to relevant laws and regulations, Danone can make a contribution on behalf of a Health Worker for fellowships, study tours, attendance at professional conferences and symposia and similar informational

	professional conferences, or the like. Similar disclosures should be made by the recipient.		and educational programmes. Danone ensures a transparent process is followed and documented with regards to such contributions and that they are communicated to the organisation to which the Health Worker is affiliated.
NA		<b>Article 7 Events for Health Workers</b>	7.1 Educational events are events such as symposia, congresses or other scientific or professional meetings organised by Danone or by third parties. These events provide either educational or professional training to Health Workers or a forum to exchange scientific information related to our products and the Health Workers area of professional expertise. It must be the scientific strength of the programme content only that attracts delegates.
			<p>7.2 Danone does not organise or support events for Health Workers (including supporting individuals to attend such events) unless the following requirements are met:</p> <ul style="list-style-type: none"> <li>– The event complies with the hospitality requirements in this BMS Policy as described in Clause 7.5 of this BMS Policy.</li> <li>– Any initiation is made in writing to the business address of the HCP.</li> <li>– There is documented proof of attendance of all invited Health Workers.</li> </ul>

			<ul style="list-style-type: none"> <li>– Support of the Health Worker is limited to the payment of and/or reimbursement of reasonable travel, meals, accommodation and registration fees.</li> <li>– No payments are made directly or indirectly (by daily allowances) to compensate the Health Worker for time spent in attending the Event.</li> <li>– Any event support provided to individual Health Worker must not be conditional upon an obligation to prescribe, recommend, sell or promote any Covered Products or reward of such activities.</li> <li>– Such support is permitted under local laws and regulations.</li> </ul>
			7.3 Danone does not pay any costs associated with individuals accompanying invited Health Worker, unless such individuals independently qualify for payment of such costs.
			7.4 All events are held with a clear legitimate purpose with medical and educational

			content. Danone avoids using extravagant venues.
			7.5 Hospitality is limited to refreshments and/or meals incidental to the main purpose of the event and is only provided to participants of the event, and not their guests. All hospitality offered or given must be legally permitted, legitimate, reasonable, and proportionate. We do not influence or reward a Health Worker's decision, advice, professional or business conduct in general, by means of our hospitality.
			7.6 No stand-alone entertainment or other leisure or social activities are provided or paid for by Danone. At events, entertainment of modest nature, which is secondary to refreshments and/or meals, is allowed. Danone does not organise any entertainment that could be perceived as an incentive for the Health Worker to attend the event for reasons other than professional and scientific.
NA		Article 8 Grants	8.1 Danone may provide Grants to support genuine independent scientific research, advancement of science and education, or patient and public education in relation to the Covered Products. However, support of these programmes and activities by Danone must not be viewed as a price concession, a reward to favoured Health Workers or as an inducement to recommend, prescribe or

			purchase products or services of Danone. Therefore, Danone maintains appropriate documentation in respect of all Grants made in relation to Covered Products.
			8.2 Grants must comply with all relevant aspects of codes of conduct of Health Workers and their institutions.
			8.3 Grants are not tied in any way to past, present or potential future use or recommendations of Covered Products.
			8.4 Grants can only be made to organisations or entities entitled to receive them under applicable laws and regulations and should not be made to individual Health Workers.
NA		<b>Article 9 Clinical Studies</b>	9.1 The use of Covered Products in clinical studies is permitted as they play a vital role in demonstrating the safety and efficacy of Covered Products and are important for promoting the health of those infants who do not receive breast-milk exclusively.
			9.2 Danone may provide clinical study investigators with quantities of Covered Products for the purpose of clinical evaluation to be distributed to participating mothers during the period of the clinical study. In that case, quantities of distributed Covered Products should strictly correspond to Study protocol and declared number of infants.
			9.3 Studies are conducted according to the

			International Council for Harmonisation (ICH) Good Clinical Practice guidelines, the Declaration of Helsinki, and all other applicable local and international laws and regulations.
			9.4 Danone takes every reasonable and practical measure not to interfere with the commitment by mothers to breast-feed while participating in its clinical studies.
			9.5 All activities should be conducted openly and transparently and without any improper influence on clinical study participants, results or outcomes or in any way to influence the provision, supply, dispensing or promotion of any Danone products.
<b>Article 8</b> <b>Persons Employed by Manufacturers and Distributors</b>		<b>Article 11</b> <b>Employees and Partners</b>	11.1 All Danone Employees and Partners responsible for the Marketing of Covered Products receive training, which includes the aims and principles of the WHO Code and the Danone commitments to responsible Marketing as outlined in this BMS Policy.
	8.1 In systems of sales incentives for marketing personnel, the volume of sales of products within the scope of this Code should not be included in the calculation of bonuses, nor should quotas be set specifically for sales of these products. This should not be understood to prevent the payment of bonuses based on the overall sales by a company of other products marketed by it.		11.2 Bonus or incentive calculations for Danone Employees do not include volume or value targets or quotas set specifically for Covered Products. This does not prevent the payment of bonuses based on overall sales of products marketed by Danone.



	8.2 Personnel employed in marketing products within the scope of this Code should not, as part of their job responsibilities, perform educational functions in relation to pregnant women or mothers of infants and young children. This should not be understood as preventing such personnel from being used for other functions by the health care system at the request and with the written approval of the appropriate authority of the government concerned.		11.3 Danone Employees (such as healthcare nutrition representatives) and Partners, involved in the Marketing of Covered Products should not perform educational functions to pregnant women or mothers of infants and young children in HCOs. This should not prevent such personnel from providing education and support in cooperation with the HCO at the request, and with the written approval, of the appropriate authority.
<b>Article 9 Labelling</b>	9.1 Labels should be designed to provide the necessary information about the appropriate use of the product, and so as not to discourage breast-feeding.	<b>Article 12 Labelling</b>	12.1 Labels of Covered Products should not discourage breast-feeding in any way and are designed to provide all necessary information about their safe and appropriate use in accordance with applicable standards, local laws and regulations (including Codex Alimentarius Standards, where applicable).
	9.2 Manufacturers and distributors of infant formula should ensure that each container as a clear, conspicuous, and easily readable and understandable message printed on it, or on a label which cannot readily become separated from it, in an appropriate language, which includes all the following points: (a) the words "Important Notice" or their equivalent; (b) a statement of the superiority of breastfeeding; (c) a statement that the product		12.2 Unless otherwise required by law, Labels for Covered Products must contain a clear, conspicuous, and easily readable and understandable message printed on it, or on a Label which cannot be separated from it, in the appropriate language(s) which includes all the following points: <ul style="list-style-type: none"> <li>– The words "Important Notice" or their equivalent;</li> <li>– A statement of the superiority of breast-feeding;</li> </ul>

	<p>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, and a warning against the health hazards of inappropriate preparation. Neither the container nor the label should have pictures of infants, nor should they have other pictures or text which may idealize the use of infant formula. They may, however, have graphics for easy identification of the product as a breastmilk substitute and for illustrating methods of preparation. The terms "humanized", "materialized" or similar terms should not be used. Inserts giving additional information about the product and its 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 infant formula, the above should apply.</p>		<ul style="list-style-type: none"> <li>– A statement that the product should be used on the advice of a Health Worker as to the need for its use and the proper method of use;</li> <li>– Instructions for appropriate preparation, use and storage of the Covered Products, and information about the possible health hazards of inappropriate preparation.</li> </ul> <p>Such Labels should not have pictures of infants, nor should they have other pictures or text which may idealise the use of Infant Formula. The terms "humanised", "maternalised" or similar terms should not be used.</p>
	<p>9.3 Food products within the scope of this Code, marketed for infant feeding, which do not meet all the requirements of an infant formula, but which can be modified to do so, should carry on the label a warning that the unmodified product should not be the sole source of nourishment of an infant. Since sweetened condensed milk is not</p>		<p>12.3 Foods marketed for infant feeding that do not meet all the requirements of an Infant Formula, but which can be modified to do so, should carry on the Label a warning that the unmodified product should not be the sole source of nourishment of an infant.</p>

	<p>suitable for infant feeding, nor for use as a main ingredient of infant formula, its label should not contain purported instructions on how to modify it for that purpose.</p> <p>9.4 The label of food products within the scope of this Code should also state all the following points: (a) the ingredients used; (b) the composition/analysis of the product; (c) the storage conditions required; and (d) the batch number and the date before which the product is to be consumed, taking into account the climatic and storage conditions of the country concerned.</p> <p>NA</p>		<p>12.3 Labels of Covered Products must include a clear age indication and should also state the following points: (a) the ingredients used; (b) the composition/analysis of the product; (c) the storage conditions required; and (d) the batch number and the date before which the product is to be consumed, taking into account the climatic and storage conditions of the country concerned.</p> <p>12.5 Labels of Covered Product must not make any health or nutrition claims except where specific claims are permitted under local laws and regulations or relevant Codex Alimentarius standards, as applicable.</p>
<p><b>Article 10</b> <b>Quality</b></p>	<p>10.1 The quality of products is an essential element for the protection of the health of infants and therefore should be of a high recognized standard.</p> <p>10.2 Food products within the scope of this Code should, when sold or otherwise distributed, meet applicable standards recommended by the Codex Alimentarius Commission and also the Codex Code of Hygienic Practice for Foods for Infants and Children.</p>	<p><b>Article 13</b> <b>Quality of Covered Products</b></p>	<p>13.1 To ensure the protection and health of infants, Danone manufactures all Covered Products under strict hygienic and quality management procedures.</p> <p>13.2 Covered Products, when sold or otherwise distributed, meet all applicable quality and hygiene standards (for example Codex Alimentarius Standards), local laws and regulations. If Danone's global quality standards are stricter than local regulations, then</p>

			Danone global quality standards are followed.
<b>Article 11 Implementation and Monitoring</b>	11.1 Governments should take action to give effect to the principles and aim of this Code, as appropriate to their social and legislative framework, including the adoption of national legislation, regulations or other suitable measures. For this purpose, governments should seek, when necessary, the cooperation of WHO, UNICEF and other agencies of the United Nations system. National policies and measures, including laws and regulations, which are adopted to give effect to the principles and aim of this Code should be publicly stated, and should apply on the same basis to all those involved in the manufacture and marketing of products within the scope of this Code.	<b>Danone Commitments &amp; Article 14 Responsibilities for Implementation &amp; Article 15 Responsibilities of Danone Employees &amp; Article 16 Monitoring (Assessments, Audits and Verifications) &amp; Article 17 Reporting &amp; Article 18 Allegations, Investigations &amp; Sanctions &amp; Article 19 Advocacy</b>	We respect the role of national governments to develop health policies that are appropriate to their social and legislative frameworks and overall development objectives.
	11.2 Monitoring the application of this Code lies with governments acting individually, and collectively through the World Health Organization as provided in paragraphs 6 and 7 of this Article. The manufacturers and distributors of products within the scope of this Code, and appropriate nongovernmental organizations, professional groups, and consumer organizations should collaborate with governments to this end.		<p>We support governments in their efforts to implement the WHO Code and cooperate with governments to monitor the application of the WHO Code.</p> <p>19 To succeed in Danone's ambition of fostering the alimentation revolution, we need to engage and work in partnership with a wide range of stakeholders, including governments, regulators and legislators, civil society and others in the business environment such as peer companies. We acknowledge and support the WHO Code and subsequent relevant WHA resolutions.</p>

			<p>The Early Life Nutrition Division complies with Danone's Global Advocacy Policy and ensures that any lobbying related to the implementation of the WHO Code adheres to these respective principles.</p>
	<p>11.3 Independently of any other measures taken for implementation of this Code, manufacturers and distributors of products within the scope of this Code should regard themselves as responsible for monitoring their marketing practices according to the principles and aim of this Code, and for taking steps to ensure that their conduct at every level conforms to them.</p>		<p>We monitor our Marketing practices according to the principles and aims of the WHO Code, independent of any other measures taken by governments to implement the WHO Code, and take steps to confirm that our conduct at every level conforms to our Policy in this regard.*</p> <p>* (See Article 14 for Responsibilities for Implementation, Article 16 for Monitoring (Assessments, Audits and Verifications) and Article 17 for Reporting)</p>
	<p>11.4 Nongovernmental organizations professional groups, institutions and individuals concerned should have the responsibility of drawing the attention of manufacturers or distributors to activities which are incompatible with the principles and aim of this Code, so that appropriate action can be taken. The appropriate governmental authority should also be informed.</p>		<p>18.5 A process is in place to enable Employees and third parties to report alleged incidents of non-compliance with the BMS Policy, in a confidential and anonymous manner. The Danone Ethics Line allows Employees to report outside their normal management reporting line potential non-compliance with company policy in a way that protects them from possible negative consequences of such reporting.</p>
	<p>11.5 Manufacturers and primary distributors of products within the scope of this Code should apprise each member of their marketing personnel of the</p>		<p>15.1 A process is in place to ensure that Danone Employees responsible for the Marketing, distribution, selling, education and/or governance of Covered</p>

	Code and of their responsibilities under it.		Products, understand the aims and principles of our BMS Policy, and their individual responsibilities in adhering to it.
	11.6 In accordance with Article 62 of the Constitution of the World Health Organization, Member States shall communicate annually to the Director-General information on action taken to give effect to the principles and aim of this Code.		NA
	11.7 The Director-General shall report in even years to the World Health Assembly on the status of implementation of the Code; and shall, on request, provide technical support to Member States preparing national legislation or regulations, or taking other appropriate measures in implementation and furtherance of the principles and aim of this Code.		NA