	TECHNICAL POLICIES	STATUS:	GUIDANCE
TITLE	Kraft Heinz charter for marketing breast-milk substitutes		
SCOPE	Kraft Heinz infant formula and follow-on formula products		
PURPOSE	To develop a worldwide charter of practice for marketing breast-milk substitutes consistent across Kraft Heinz Business Units		

PURPOSE

The Kraft Heinz Company recognizes the importance and the superiority of breast-milk in feeding infants and young children.

The purpose of this policy is to develop a worldwide charter of practice for marketing breast-milk substitutes consistent across Kraft Heinz Business Units. Kraft Heinz Business Units are committed to comply with the World Health Organization (WHO) International Code for Marketing of Breast-Milk Substitutes and subsequent relevant WHA resolutions as implemented by national legislation or codes of practice. The aim is to support breast-feeding and to outline principles and requirements to provide safe and adequate nutrition for infants and young children, when breastfeeding cannot be (or cannot be entirely) provided.

SCOPE

This policy applies to all Kraft Heinz Company Business Units unless local legislation explicitly prescribes otherwise.

Kraft Heinz business units are committed to comply with this policy and in conjunction with their national regulatory requirements and marketing codes of practice commitments.

This policy applies to the following products: infant formula suitable from birth to 12 months and follow-on formula suitable from 6 months to 12 months.

DEFINITIONS

- Infant: Person under the age of twelve months.
- Young children (Toddler): Person aged between one and three years.
- Breast-Milk Substitute: Any food being marketed or otherwise represented as a partial or total replacement for breast-milk, whether or not suitable for that purpose. (ref: WHO Code)
- o <u>Infant formula:</u> 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". (ref: WHO Code)
- Complementary foods: Any food, whether manufactured or locally prepared, suitable as a complement to breast-milk or to infant formula, when either becomes insufficient to satisfy the nutritional requirements of the infant. Such food is commonly called "weaning food" or "breast milk supplement". (ref: WHO Code)
- Samples: Single or small quantities of a product provided without cost. (ref: WHO Code)
- Supplies: 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. (ref: WHO Code)
- <u>Donation</u>: Act of liberality through which a donor (Kraft Heinz) disposes of products, materials and equipment intended for professional use, information or education in favor of a donee (healthcare professionals, institutions or organizations).
- WHO Code: International Code of Marketing of Breast- Milk Substitutes, World Health Organization, Geneva (1981), and any subsequent WHA resolutions.

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PREAMBLE

Kraft Heinz Business Units are committed to the following principles:

- o To place the health and well-being of infants and young children first at all times.
- To actively support education about the benefits and superiority of breast-feeding.
- o To ensure that high quality, nutritious infant formula is available for those who require a breast-milk substitute, and that information concerning its use is available.
- To provide follow-on formula of high quality and nutritionally balanced to contribute to the normal growth and development of infants from six months on a progressively diversified diet.
- To support governments and communities in efforts to increase public awareness of sound infant feeding practices.
- To facilitate mothers' correct information about the importance and superiority of breast-milk and correct practices of infant feeding, as well as to provide healthcare professionals information restricted to scientific and factual matters, which shall not imply or create a belief that bottle-feeding is equivalent or superior to breast-feeding.
- To continue to support and carry out scientific and clinical research and to encourage postgraduate education on infant and young child nutrition.
- Scientific and factual information and educational material, dealing with the feeding of infants intended for parents and health professionals whether written, audio or visual should be in accordance with WHO code as implemented by national legislation This should include clear information on points including:
 - the benefits and superiority of breastfeeding
 - maternal nutrition, and the preparation for and maintenance of breast-feeding
 - the negative effect on breast-feeding of introducing partial bottle-feeding
 - the difficulty of reversing the decision not to breast-feed
 - when needed the proper use of infant formula

When they contain information on the use of infant formula they should include:

- Social and financial implications of its use
- The health hazards of inappropriate foods or feeding methods
- The health hazards of unnecessary or improper use of infant formula and other breastmilk substitutes

Such materials should not use pictures or text which may idealize the use of breast-milk substitutes. (WHO code Article 4.2)

REQUIREMENTS

- Kraft Heinz Business Units are committed to comply with the aims and principles of the WHO Code of Marketing Breast-Milk Substitutes, as implemented by national legislation or codes of practice, where these exist.
- Kraft Heinz Business Units are committed to comply on a voluntary basis with the aims and principles of the WHO International Code of Marketing of Breast-Milk Substitutes.
- o Kraft Heinz Business Units shall respect the following marketing policies.
- Kraft Heinz recognizes protecting and promoting breast-feeding as the best source of nourishment for

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infants and young children.

- Labeling and any other kind of communication (marketing materials) concerning of breast-milk substitutes as well as information and educational materials whether written, aural, audio, or visual, dealing with the feeding of infants shall not imply or create a belief that bottle-feeding is superior or equal to breast-feeding, nor discourage breast-feeding.
- Labeling and any other kind of communication concerning of breast-milk substitutes shall be in an appropriate language(s) and shall have a clear, conspicuous, easily readable and understandable message printed on it or on a label, which cannot readily become separated from it.
- Labeling and any other kind of communication concerning of breast-milk substitutes shall not include pictures of infants, nor include other pictures or text, which may idealize the use of the product.
- Labeling and any other kind of communication concerning of breast-milk substitutes shall bear, preceded by the words "Important Notice" or their equivalent, a statement concerning the superiority of breastfeeding.
- Labeling and any other kind of communication concerning of breast-milk substitutes shall bear instructions for appropriate preparation of the product and a warning against the health hazards of inappropriate use.
- o The use of the terms "humanized", "maternalized", or similar terms shall be avoided.
- The labeling of follow-on formula, shall not contain pictures or text, which may imply or create a belief that they can be used as a substitute for breast-milk during the first six months of life.
- There shall be no advertising directed to or donation of samples, informational or educational materials of breast-milk substitutes given directly to the general public.
- Samples of breast-milk substitutes shall not be given to health care professionals or pediatricians or healthcare institutions, except for the purpose of professional evaluation or research. No financial or material inducement will be made to health workers to promote breast-milk substitutes.
- Donations of informational or educational equipment or materials shall 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 Heinz name or logo, but shall not refer to a proprietary product, and should be distributed only through the healthcare system.
- Donations or low-price sales to healthcare professionals and healthcare institutions or organizations of supplies of infant formula or other products, whether for use in the institutions or for distribution outside them, shall only be used or distributed for infants who have to be fed on breast-milk substitutes and not as a sales inducement. If these supplies are distributed for use outside the institutions, this shall be done only by the institutions or organizations concerned. Where donated supplies of infant formula or other products are distributed outside a healthcare institution, the institution or organization shall take steps to ensure that supplies can be continued as long as the infants concerned need them.
- Humanitarian aid donations, in case of emergency and disaster situations, can be made only through government channels or internationally recognized aid agencies and only in response to a specific written request by the government or appropriate aid agency that clearly documents the medical and social
 - grounds for the request. Shipments shall be delivered to the requesting government or aid agency and not directly to caregivers.
- Systematic training for Medical Detailing, Marketing and R&D Heinz personnel shall be provided towards Company policies and WHO International Code of Marketing of Breast-Milk Substitutes compliance and

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national legislation or codes of practice, where these exist.

 Heinz personnel employed in marketing products shall not, as part of their job responsibilities, perform educational functions in relation to pregnant women or mothers of infants and young children.

ADMINISTRATIVE RESPONSIBILITY

The European Infant Nutrition Manager is responsible for the supervision, updating and administration of this policy.

The Director of Global Infant Nutrition is responsible for monitoring this policy.