



FTSE4Good



FTSE4Good Breast Milk Substitutes Marketing Criteria

POLICY CRITERIA

Company policy should include:

1. Acknowledge the importance of the International Code of Marketing of Breast-milk Substitutes, and subsequent relevant WHA resolutions¹, hereafter referred to as "the Code"².
2. Acknowledge that the Code is a recommendation that applies to all Member States of the WHO, to be implemented in accordance with their legislative and social framework, and to all products within the scope of the Code³.
3. Acknowledge that, independently of any other measures taken by governments to implement the Code, manufacturers are responsible for monitoring their marketing practices according to the principles and aim of the Code, and for taking steps to ensure that their conduct at every level conforms to them in agreement with policy point 4.
4. Acknowledge that the Code applies in all countries whether or not governments have taken action to completely implement the Code. Acknowledge that the adoption and adherence to the code is a minimum requirement and where national legislation or regulations implementing the Code are wider in scope and application than the Code, the company must follow the national measures in addition to the Code.
5. Name the person responsible at Corporate Executive Board level or Executive Management level and at the individual country level for the implementation and monitoring of the policy.

MANAGEMENT SYSTEMS

FTSE propose that companies should clearly demonstrate the presence and application of the following management systems:

1. Clear communication of company policy on the marketing of products within the scope of the Code, procedures for its implementation throughout the production and marketing processes, and provision of training in its application, to senior management and all relevant marketing staff.
2. Clear accountability and responsibility within the Company for the implementation of systems for compliance at all levels.

¹ The subsequent resolutions are; WHA 39.28 (1986), WHA 45.34 (1992), WHA 47.5 (1994) WHA 49.15 (1996), WHA 54.2 (2001), WHA 55.25 (2002)

² These are all found on http://www.who.int/nutdocuments/code_english

³ The scope of the Code is defined in Article 2 of the Code and 'breast-milk substitutes' and 'complementary foods' are defined in Article 3 of the Code. These are reproduced in Appendix A. WHO recommends that infants be breastfed exclusively for the first 6 months of life and that, once complementary feeding has begun, breastfeeding should continue up to the age of 2 years or beyond.



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3. Whistleblowing procedures that allow employees to report potential non-compliance with company policy, in a way that protects them from possible negative consequences of such reporting, outside their normal management reporting line.
4. On-going systematic internal monitoring of compliance.
5. Systems for investigating and responding in timely manner to alleged non-compliance reported by governmental bodies, professional groups, institutions, NGOs or other individuals from outside the Company.
6. Systems for taking, as well as tracking, corrective action on all non-compliance cases.
7. Regular external verification to provide evidence of well functioning Code compliance management and monitoring systems, conducted by a suitably qualified external expert.
8. In addition to management reviews, the production of annual summary reports to the Board of Directors on internal monitoring, external reporting and corrective actions taken regarding non-compliance.

EXTERNAL REPORTING

Adequate company reporting procedures should include available annual summary reports on adherence to policy, non-compliance, and corrective action taken.

This includes external verification regarding evidence of well-functioning Code compliance management and monitoring systems, conducted by auditors or expert assurance providers.

GOVERNANCE AND PERFORMANCE CRITERIA

FTSE will establish a small Expert Committee, comprising academics and experts on the industry, which will review company reports to assess whether they adhere to the FTSE4Good criteria and to make recommendations to the FTSE4Good Policy Committee as to the continuing eligibility of companies.