

**Meiji Group Policy for the Marketing of Breast-
milk Substitutes**

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1. Preamble

-Message from our CEO

For over 100 years, we, Meiji Group, have walked side-by-side with babies and families, providing happiness to all families by supporting the healthy development of babies.

We believe that breast-milk on which babies are raised is the best source of nutrition for babies. Breast-milk contains the optimal volume and balance of the various nutrients required for baby's growth. The nutrients, which include protein, carbohydrates, fat, vitamins and minerals, and infection defense factors, which protect babies from infectious diseases, contained in breast-milk are essential to baby's growth. Child-rearing based on breast-milk fulfills a critical role in baby's growth and development, and also helps form strong emotional bonds between the mother and baby.

Based on our recognition of breast-milk as the best nutrition for babies, we adopt the basic stance of recommending breastfeeding. Furthermore, we recognize the importance of the World Health Organization (WHO) 's International Code of the Marketing of Breast-milk Substitutes (WHO Code) and subsequent related resolutions by the World Health Assembly (WHA). As such, we support the WHO's global public health recommendation calling for exclusive breastfeeding for the first 6 months of life followed by breastfeeding together with the introduction of safe and appropriate complementary foods from 6 months through 36 months of life. We also promote the importance of breastfeeding beyond the first six months of life.

The WHO recognizes the role of breast-milk substitutes (BMS) as the only safe and high-nutrient alternative to breast-milk when used appropriately. As a corporate group involved in food and health, Meiji Group is aware of the weight of our responsibilities. With this in mind, we practice fairness and integrity based on high ethical standards and our strict adherence to Meiji Group Policy for the Marketing of Breast-milk Substitutes.

This Policy is based on the WHO Code. Meiji Group is dedicated to working with national governments, non-government organizations (NGO), medical experts, consumer groups and industries towards resolving issues related to infant environments in order to improve the health and nutrition of all pregnant women, mothers and babies. In countries with no particular laws or ordinances, we will work to promote the importance of self-regulatory action at the industry level.

We believe that medical and nutritional experts fulfill a critical role in supporting the healthy development of infants by providing infant mothers and their families with high-quality nutritional information that is backed by science. We also believe it is important to, based on consultations with medical and nutritional experts, provide science-backed, high-quality products to support the

healthy development of infants in environments facing insufficient breast-milk or when individual circumstances make it difficult to provide breast-milk.

We are also engaged in efforts towards resolving social issues through our business activities.

We position supporting the healthy development of all infants as a critical social mission. In addition to infant formulas for healthy children, we also provide products for infants with special needs, including infants with allergies and infants with congenital metabolic disorders.

The world also continues to face social issues such as malnutrition among toddlers of ages 12 to 36 months due to iron and vitamin D deficiencies. We are dedicated to addressing these issues and helping improve conditions.

At the same time, we also recognize that breast-milk substitutes are essential during emergency situations such as large-scale disasters. As such, we will also strive to work with governments towards contributing to preparations aimed at addressing disaster risks.

For over 100 years, we, Meiji Group, embraced the “nourishment of society” as one of our founding philosophies and carried on our mission of making “contributions to society through food.” That’s why Meiji products have long been popular with people from all ages from infants to the elderly. We will continue working to provide optimal nutrition and contribute to the healthy development of infants around the world.



Kazuo Kawamura

CEO

President and Representative Director
Meiji Holdings Co., Ltd.

-About the WHO Code serving as the basis for Meiji Group Policy for the Marketing of Breast-milk Substitutes (BMS)

In 1981, the WHO adopted the International Code of the Marketing of Breast-milk Substitutes (WHO Code).

The WHO Code was issued by the WHO to recommend the regulation of marketing for breast-milk substitutes (BMS) and to encourage breastfeeding.

The aim of the WHO Code is to contribute to providing infants with safe and sufficient nutrition by protecting and promoting breastfeeding, and by ensuring that, when necessary, breast-milk substitutes are used based on proper information and through appropriate marketing and provision.

The WHO Code recognizes that encouraging breastfeeding is necessary to promoting the healthy growth and development of infants and an important aspect of health, nutrition, and other social measures. Furthermore, the WHO Code recognizes the proper use of breast-milk substitutes in cases where the mother is not able to provide sufficient volumes of breast-milk.

The WHO Code also recognizes that the marketing and provision of breast-milk substitutes must not interfere with the protection and promotion of breastfeeding, that inappropriate feeding practices lead to infant malnutrition, morbidity, and mortality in all countries and regions, and the possibility that inappropriate marketing of breast-milk substitutes and related products can contribute to these major health problems.

To promote the importance of encouraging breastfeeding, the WHO recommends that the government of each nation establishes social systems, including necessary measures such as the establishment of laws and ordinances granting efficacy to the aim and principles of the WHO Code, and takes action aligned with overall development objective.

2. Articles of Meiji Group Policy for the Marketing of Breast-milk Substitutes

WHO Code Article 1

Article 1: Aim

Meiji Group recognizes and supports the aim and principles of the International Code of the Marketing of Breast-milk Substitutes (WHO Code) to contribute to providing safe and adequate nutrition for infants by protecting and promoting breastfeeding and ensuring that, when necessary, breast-milk substitutes (BMS) are used based on proper information and through fair and appropriate marketing, distribution and provision.

WHO Code Article 2

Article 2: Scope

-Applicable persons

This Policy shall be applied to all officers and employees associated with Meiji Group who are involved in the marketing (including sales) of Covered Products. Furthermore, compliance with this Policy is also requested of sales agents that have contracts with Meiji Group companies.

-Geographical scope by applicable product

Applicable product type	Higher risk countries (*1)	Lower risk countries
Infant Formula (products for ages 0-6 months)	This Policy or respective national regulations, whichever is stricter	
Follow-on Formula (products for ages 6-12 months)	This Policy or national regulations, whichever is stricter	National regulations
Complementary Foods (products for ages below 6 months)		
Growing-up Formula (products for ages 12-36 months)	National regulations	

(*1) Defined as a higher risk country based on the “FTSE4 Good Inclusion Criteria for the Marketing of Breast-Milk Substitutes ” if fulfilling any of the following criteria (July 2017).

- More than 10 per 1000 under 5 mortality rate
- More than 2% acute malnutrition (moderate and severe wasting) in under-5s Furthermore, a list

of higher risk countries is included as an annex at the end of this document. Countries not included in this annex are classified as lower-risk.

- Covered products

This Policy shall be applied to the following products.

- a. All infant formulas designed to fulfill the nutritional requirements of healthy infants through the first six months of life.
- b. All follow-on formulas designed to fulfill the nutritional requirements of healthy infants in the first 6-12 months of life.
- c. Complementary foods for healthy infants less than six months from birth.

In this Policy, the abovementioned products shall collectively be referred to as “Covered Products”. This Policy shall not be applied to products other than Covered Products. Furthermore, products other than Covered Products refer to all products manufactured or sold by Meiji Group other than Covered Products. This includes infant products used under the supervision of a physician for infants with unique medical conditions, such as the inability to ingest, absorb, digest, metabolize, or excrete infant formulas or follow-on formulas designed to fulfill the nutritional requirements of healthy infants.

WHO Code Article 3

Article 3: Definitions

Terminology indicated in this Policy is defined in the annex included at the end of this document.

WHO Code Article 4

Article 4: Information and education

Article 4, Paragraph 1

Meiji Group supports governments and experts in the fields of medicine and nutrition to ensure the provision of objective and consistent information regarding infant feeding, and to enable the families of infants and people involved in the field of infant feeding the ability to utilize that information.

Article 4, Paragraph 2

For information and educational materials related to infant feeding for pregnant women and mothers of infants, we reference the following matters as outlined in Article 4, Paragraph 2 of the WHO Code.

- (a) The benefits and superiority of breastfeeding
- (b) Nutrition for pregnant women and mothers, and information on preparing and maintaining breastfeeding
- (c) The possibility of difficulty with breastfeeding once combined breast and bottle feeding is started
- (d) The difficulty of reversing to breastfeeding after making decision not to breastfeed
- (e) Proper usage methods when the use of infant formula is required

For these types of materials, we also reference the additional information outlined in WHO Code Article 4, Paragraph 2 and do not use images or text that idealize the use of Applicable Products.

Article 4, Paragraph 3

Information and educational materials distributed by Meiji Group targeting pregnant women and mothers of infants in relation to use by health care systems shall be provided or distributed only when a written request has been received from relevant authorities, institutions, or a health care system, or only when said information or educational materials are aligned with guidelines formulated by the national government.

Such educational materials will include the name or logo of a Meiji Group company in some cases, but shall not include any indication of the brand name of Covered Products or any visual representations of Covered Product containers. Furthermore, materials shall be distributed only through the health care system.

WHO Code Article 5

Article 5: General public and mothers

Article 5, Paragraph 1

Meiji Group shall not advertise or promote the sales of Covered Products to the consumer .

Article 5, Paragraph 2

Meiji Group shall not, directly or indirectly, provide samples of Covered Products to pregnant women and infant mothers, or their families.

Article 5, Paragraph 3

Meiji Group shall not use advertisements, the provision of samples, or other promotional devices in storefronts for the purpose of directly soliciting purchases of Covered Products by the consumer. In countries with no particular laws or ordinances, we will request understanding concerning our stance to not provide samples of Covered Products or marketing devices to distributors.

Furthermore, this paragraph shall not restrict the establishment of pricing policies or business practices for the long-term provision of products at low prices.

Article 5, Paragraph 4

Meiji Group shall not distribute or provide gifts such as documents or articles that promote the use of Covered Products to pregnant women or infant mothers.

Article 5, Paragraph 5

Meiji Group officers and employees involved in the sales of infant foods shall not seek direct or indirect contact with pregnant women and infant mothers for the purpose of selling or promoting Covered Products. In countries with no particular laws or ordinances, we shall request understanding from health care systems concerning the reevaluation of our stance on making contact with pregnant women and infant mothers.

Furthermore, this paragraph shall not prevent employees of Meiji Group who have received training from responding to questions from general consumers regarding Covered Products and other foods for infants via telephone helpline, websites, social media, etc.

WHO Code Article 6

Article 6: Health care systems

Article 6, Paragraph 1

WHO Code Article 6, Paragraph 1 is outlined for authorities with jurisdiction over health care.

Article 6, Paragraph 2

Meiji Group shall not use health care systems for the purpose of selling or promoting Covered Products. Regarding the provision of information to health workers, as stipulated in Article 7, Paragraph 2, in some cases scientific and factual matter concerning formulas and their correct use may be provided by Meiji Group employees solely to health workers for the purpose of supporting the provision of guidance to pregnant women and infant mothers or their families after emphasizing the superiority of breastfeeding and the WHO Code.

Article 6, Paragraph 3

Meiji Group shall not display Covered Products containing placards or posters related to Covered Products in health care systems, nor provide or distribute materials related to Covered Products other than those defined in Article 4, Paragraph 3.

Article 6, Paragraph 4

Meiji Group shall not employ or pay for “professional service representatives”, “mothercraft nurses”, or similar personnel in health care systems for the purpose of selling or promoting Covered Products.

Article 6, Paragraph 5

Meiji Group employees shall not support infant formula feeding demonstrations for Covered Products but may provide and distribute education and instructional materials related to support to health workers providing guidance to pregnant women and infant mothers or their families (see Article 6, Paragraph 2). If a mother or their family seeks advice from a Meiji Group employee concerning Covered Products, the employee must refer that person to a health worker or community worker. In countries with no particular laws or ordinances, we will seek understanding from health care systems regarding reevaluating our stance on infant formula feeding demonstrations.

Article 6, Paragraph 6

Covered Products may be donated or provided at reduced price in cases when a written request is received from a health care system or in accordance with a highly transparent process by Meiji Group.

Article 6, Paragraph 7

Meiji Group recognizes the responsibilities as a donator outlined in WHO Code Article 6, Paragraph 7.

Article 6, Paragraph 8

When permitted by the laws and regulations of the relevant country and when compliant with Meiji Group policies, Meiji Group may provide the items stipulated in Article 4, Paragraph 3 as well as provide health workers with practice-related equipment or educational materials to be used by

health workers. Such equipment and educational materials may not display Applicable Product brand names or logos, but may include Meiji Group company names or logos.

WHO Code Article 7

Article 7 Health workers

Article 7, Paragraph 1

Meiji Group shall provide support to ensure that health workers are familiar with duties based on the WHO Code.

Article 7, Paragraph 2

In the provision of information to health workers, officers and employees of Meiji Group have a responsibility to emphasize the superiority of breastfeeding and the WHO Code, and provide health workers with scientific and factual matter regarding formulas and their correct use. We also recognize that product information for health workers related to formulas, whether it be text or images, should avoid promotional language or content designed to idealize nutritional supplementation using formula feeding over breastfeeding. Furthermore, we clearly indicate that product information is solely intended for health workers.

However, this shall not necessarily be the case as it relates to the provision of medical information. Pictures may be included in some cases and Meiji Group company names or product brand names may be included for the purpose of easily identifying a product.

Article 7, Paragraph 3

No gifts, benefits in kind, or any other financial or material inducements or benefits shall be provided to health workers or their families for the purpose of supplying, recommending, or selling Covered Products, or to promote the sales of Covered Products.

When permitted by the laws and regulations of the relevant country and when compliant with Meiji Group policies, in rare instances Meiji Group may give inexpensive gift that are unrelated to the work of the health worker during significant national events, cultural events, or religious events if said presents do not display Applicable Product brand names or logos.

Article 7, Paragraph 4

Excluding when necessary at the institutional level for the professional evaluation or study of Covered Products, Meiji Group shall not provide health workers any samples of Covered Products, nor any equipment or utensils necessary for the preparation or use of said samples.

However, limited to the following circumstances, Meiji Group may provide health workers Covered Products “samples for professional evaluations”.

- When introducing new Covered Products or new packaging/labels for Covered Products
- When introducing new formulation or recipes for Covered Products
- When introducing Covered Products to new or recently qualified health workers
- When for the purpose of health care or examination by a health worker
- When for the purpose of gaining experience regarding the effectiveness of Covered Products by a health worker, including evaluations of suitability and tolerance

Conditional to the conclusion of research protocols, Meiji Group companies may provide Covered Products to health workers for the purposes of research or clinical validations. Furthermore, clinical validations must not be conducted for the purpose of inducing sales of Covered Products, and must comply with the detailed internal rules of each company.

Article 7, Paragraph 5

When for the purpose of promoting the continuous professional development and training, or when in accordance with relevant laws and regulations, Meiji Group may provide health workers fellowships, study tours, research grants, opportunities to attend professional conferences, symposiums, conferences, or similar information or educational programs. Meiji Group shall guarantee such activities are conducted in accordance with a highly transparent process and, when taken such measures, shall provide information disclosure to the institution to which the relevant health worker is affiliated.

WHO Code Article 8

Article 8: Persons employed by manufacturers and distributors

Article 8, Paragraph 1

The bonuses of marketing personnel (sales staff) associated with Meiji Group are not paid based on the achievement of certain sales goals or quotas related to Covered Products.

Bonus amounts are determined comprehensively based on total sales for products sold by Meiji Group companies.

Article 8, Paragraph 2

Marketing personnel (sales staff) associated with Meiji Group do not perform any educational function in health care systems related to Covered Products for pregnant women or infant mothers.

However, this paragraph does not prevent marketing personnel (sales staff) from providing education and support in cooperation with a health care system in response to when written request is received from appropriate authorities, institutions, or a health care system.

WHO Code Article 9

Article 9: Labelling

Article 9, Paragraph 1

Applicable Product containers are in compliance with the national laws and applicable regulations (International Food Standards by the Codex Alimentarius Commission, etc.) of each country. Labels shall promote childrearing based on infant feeding and include all necessary information to ensure the safe and appropriate use of Covered Products.

Article 9, Paragraph 2

Excluding where otherwise stipulated by law, labels for Covered Products must be printed on containers or labels affixed to containers (objects that cannot be removed easily).

Covered Products must have labels that are conspicuous, easily readable, easily understandable, and use appropriate language, and must be compliant with the following.

- (a) Include the expression “Important Notice” or the equivalent
- (b) Clear indication of the superiority of breastfeeding
- (c) Indicate that advice from a health worker should be received concerning when it is necessary to use the Applicable Product
- (d) An instruction of appropriate preparation, and a warning concerning the health hazards associated with inappropriate preparation

Furthermore, “appropriate language” shall be based on parameters decided on by relevant authorities or institutions.

Containers or labels must not include any pictures or images of infants, or any pictures or text idealizing the use of infant formulas.

However, this paragraph shall not prevent the use of illustrations designed for the ease of identifying Covered Products or to explain preparation methods. Labels shall not include the expressions “humanized” or “maternalized”, or any similar expressions.

Article 9, Paragraph 3

For Covered Products sold for the purpose of complementing infant feeding that do not meet all nutritional requirements but can be modified to meet all requirements, we reference an adequate warning indicating that “unmodified products should not be used as the sole source of infant feeding”.

Article 9, Paragraph 4

Unless specifically stipulated by law, Applicable Product containers or labels must indicate the target age and the following points.

- (a) The ingredients used
- (b) Product composition/analysis
- (c) Necessary storage conditions
- (d) Product expiration date adjusted for the climate and storage conditions of the distributed country, and the batch number

WHO Code Article 10

Article 10: Quality

Article 10, Paragraph 1

Good quality for Covered Products is an essential element of protecting infant health. Meiji Group manufactures Covered Products under strict hygiene management and quality control.

Article 10, Paragraph 2

The sale and distribution of Covered Products must be in conformity to applicable quality and hygiene standards (e.g., standards recommended by the Codex Alimentarius Commission) as well as laws and regulations in the respective country. When Meiji Group’s global quality standards are stricter than the laws and regulations of the respective country, the application of Meiji Group’s global quality standards is prioritized.

Additional Provisions

In addition to compliance with the above Articles, Meiji Group is also engaged in efforts to resolve social issues through our business activities.

The following additional provisions are applied to all countries and regions in which Covered Products are sold or provided.

Additional Provisions Article 1: Disaster and other emergency preparations and product provision during emergencies

Article 1, Paragraph 1

We believe that breast-milk substitutes are essential even in an emergency situation such as large-scale disasters, and we want to contribute to disaster risk preparedness in cooperation with the governments of each country.

Article 1, Paragraph 2

Meiji Group may provide Covered Products to public facilities or organizations for the purposes of humanitarian aid in the event of an emergency situation such as a large-scale disaster, and when a written request from an accredited aid group with clearly documented medical objectives and social background, or from a government agency, relevant authorities, or health care system.

Article 1, Paragraph 3

Meiji Group shall, in the event of an emergency such as a large-scale disaster, or in preparation for such an event, deliver Covered Products directly to aid groups, government agencies, relevant authorities, and health care systems requesting the distribution of breast-milk substitutes to infants in need in cooperation with national governments and in accordance with the advice of health care systems. If providing outside of a public facility, Covered Products will be delivered to a relevant facility or organization. Additionally, Meiji Group does not directly deliver products to pregnant women or infant mothers.

Additional Provisions Article 2: Product provision to social welfare facilities (infant care institutions, etc.)

Article 2, Paragraph 1

Meiji Group may provide Covered Products for the purposes of humanitarian aid upon request from infant care institutions and other social welfare institutions to care for infants in need of breast-milk substitutes.

Article 2, Paragraph 2

Meiji Group may provide Covered Products to infant care institutions or other social welfare institutions limited to when a written request containing the signature of a qualified (senior) official

of the organization or institution. Furthermore, the decision to respond to each request will be made on a case-by-case basis.

The provision of Covered Products for humanitarian assistance must be made in compliance with the laws and regulations relevant to the jurisdiction where the requested Covered Products are to be delivered.

Annex

[List of higher risk countries]

- Kingdom of Cambodia
- Islamic Republic of Pakistan
- Kingdom of Thailand
- Socialist Republic of Vietnam

[Definition of terminology]

“Breast-milk substitute (BMS)”: Any food marketed or labeled as a partial or complete substitute for breast-milk.

“Complementary food”: All foods that supplement breast-milk or infant formula when breast milk or infant formula alone is insufficient to meet the infant's nutritional requirements (regardless of whether said food is manufactured or home-cooked). These foods are generally called “baby food” or “foods that supplement breast-milk nutrition”.

“Container”: All formats in which a product is packed and typically sold at retail. This also includes wrapping paper.

“Distributor”: Any individual, corporation, or other entity in the public or private sector that engages in the marketing of Covered Products at the wholesale or retail level.

“Health care system”: Facilities or organizations operated by governments, non-governmental organizations (NGO), or the private sector that are directly or indirectly involved in the health care of mothers, infants, and pregnant women. This also includes daycare centers and children's facilities, as well as health care workers operating in private practices. Note that this Policy does not include pharmacies or special dealers.

“Health worker”: A person who works in the health care system. This includes both professionals and non-professionals, as well as unpaid volunteers.

“Infant formula”: A Breast-Milk Substitute that meets the standard nutritional needs of an infant from birth to six months, is compatible with the physiological characteristics of infants, and is industrially prepared in accordance with Codex Alimentarius standards. Infant formula is sometimes prepared at home, and in such cases is referred to as “home-prepared.”

“Label”: Any tag, trademark, mark, picture, or description attached to the container of Covered Products. This includes cases of labels directly attached to the container via handwriting, printing, stencil printing, stamping, embossing, engraving, etc., as well as when attached indirectly to the container.

“Manufacturer”: A legal entity or other entity in the public or private sector that engages in the manufacturing of Covered Products as part of its business operations (including when conducting directly and when conducting indirectly through an agent, or through an entity subject to its management or a contract).

“Marketing”: Product promotion, distribution, sales, advertising, public relations activities, and information services.

“Marketing personnel (sales staff)”: Any person engaged in the marketing of Covered Products.

“Samples”: One or a small amount of the product provided free of charge.

“Codex Alimentarius Commission” (CAC): An international intergovernmental organization established in 1963 by the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO) to protect consumer health and ensure fair food trade.

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