



Reckitt Benckiser Group plc (RB) introduced in April 2018, its Policy and Procedures on the Marketing of Breast-Milk Substitutes (BMS), hereinafter referred to as 'The Policy', which applies to all employees and authorised third parties acting under the direction of RB.

The Policy outlines a number of key commitments, as follows:

1. RB supports and promotes the recommendations of the World Health Organisation (WHO) for exclusive breastfeeding during the first six months, and the introduction of safe, age-appropriate, nutritious complementary foods thereafter
2. RB advocates continued breastfeeding up to two years of age and beyond
3. RB acknowledges the importance and supports the aims and principles of the 1981 International Code of Marketing of Breast-Milk Substitutes – commonly referred to as the 'WHO Code'
4. RB is committed to marketing its BMS products ethically and responsibly at all times, to ensure our practices do not undermine the choice and ability of mothers to breastfeed in line with recommendations outlined by the WHO.

We recognise we have a major role to play, working with industry players, external stakeholders and local governments to promote engagement, transparency and accountability within the BMS industry.

We acknowledge that independent of any measures taken by local governments to implement the WHO Code, RB as part of good governance, has a responsibility for monitoring its marketing practices on products covered by the scope of The Policy. We have clearly outlined a number of monitoring activities that we deploy across our BMS businesses, one of which is the commitment to undertake external, independent audits in Higher-Risk countries¹. We have also committed to publishing the resulting audit report, as well as our response and corrective action plan (where applicable).

To this end, RB engaged Bureau Veritas UK Ltd (Bureau Veritas) earlier this year to undertake the independent audits, the first of which was completed in October, in the Philippines. Please click here to view the full report: [RB Philippines Assurance Statement](#).

We have summarised below the Scope of Work, Audit Findings, Response and Corrective Actions.

¹ Please refer to the link to see a full listing of Higher-Risk countries:
https://www.ftse.com/products/downloads/F4G_BMS_Criteria.pdf



Scope of Work:

The scope of work undertaken by Bureau Veritas encompassed:

1. Meeting management and reviewing documentation and records relating to BMS marketing practices, and
2. Interviews with Healthcare Professionals (HCPs), and
3. Visual assessment of compliance with The Policy in Healthcare Facilities (HCFs) and retail locations.

Audit Findings:

Bureau Veritas classifies the audit findings as either Non-conformance or as an Opportunity for Improvement. Three non-conformances were identified, of which one was attributable to actions of a third party not under RBs direction. In terms of opportunities for improvement, four instances were identified, two of which were attributable to actions of third parties not under RBs direction.

The audit also identified the following areas of good practice:

1. The local Philippines team had a good awareness of The Policy and applicable Local Codes/legislation
2. No evidence was found of discounting during the visual assessments of retail locations
3. No evidence was found of samples of RB Covered Products or branded materials being provided to HCPs.

Response and Corrective Actions:

Appendix 1 summarises RB's response and corrective actions to the non-conformances and opportunities for improvement identified.

Conclusion:

We are appreciative of the objectivity provided by the verification undertaken by Bureau Veritas and outlining areas of good practice, non-conformity and opportunities for improvement. We commit to implementing all corrective actions as soon as possible, and at the latest by the end of March 2019.



Appendix 1: RB's Response and Corrective Actions to the non-conformance and opportunities for improvement identified.

Observation	Response	Corrective Actions	Timeline
Non-Conformance			
HCP Materials missing mandatory statements	RB agrees with the observation noted.	Update all HCP materials, including I-pads.	Immediate
HCF to be informed of support provided to HCPs	Many HCPs operate independently and have no contractual employment relationship with a HCF. Therefore the observation is not always applicable.	Where applicable, update supporting contracts for conferences/symposiums/scientific events to include obligatory statements re disclosure.	Q1 2019
E-commerce discounting and promotion (reseller)	RB agrees with the observation noted, which was as a result of an e-commerce activity by a third-party reseller.	Discussed with e-commerce reseller and requested immediate discontinuation of the activities. Working with RB commercial teams to develop training and awareness programmes.	Immediate 2019
Opportunities for Improvement			
Agreements with HCPs	RB agrees with the observation noted.	HCP contract template under revision.	Q4 2018
Nominal value utility items as gifts	RB's interpretation of the local legislation is that nominal value items are not deemed gifts.	No actions required.	N/A
Product Placement in retail (retailer)	In both instances, the product placement represents the retailer's normal display, and applies to the entire category – not specifically RB infant nutrition products.	No actions required.	N/A
Promotional Stickers	RB understands the observation.	Promotional activity has finished. Raised with retailer of why activity reported.	Q4 2018