



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

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'. The Policy outlines RB's commitment to market its BMS products ethically and responsibly at all times.

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 and/or local legislation. 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 verifications in Higher-Risk countries<sup>1</sup>. We have also committed to publishing the resulting verification report, as well as the response and corrective action plan (where applicable).

RB has engaged Bureau Veritas UK Ltd (Bureau Veritas) to undertake the independent verifications, the first of which was completed in October 2018. In 2019, Bureau Veritas completed two further verifications – in Mexico and Malaysia. Please click here to view the Bureau Veritas reports for the [Mexican](#) and [Malaysian](#) verifications.

Summarised below is the Scope of Work, Findings, Areas of Good Practice, Response and Corrective Actions, for both the Mexico and Malaysia Bureau Veritas verifications.

#### 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. Visually assessing compliance with The Policy in Healthcare Facilities (HCFs) and retail locations. Retail locations include modern trade, pharmacies, traditional trade and wholesalers.

<sup>1</sup> Please refer to the link to see a full listing of Higher-Risk countries:  
[https://www.ftse.com/products/downloads/F4G\\_BMS\\_Criteria.pdf](https://www.ftse.com/products/downloads/F4G_BMS_Criteria.pdf)



Verification Findings:

Bureau Veritas classified the findings as either a Non-conformance or an Opportunity for Improvement. Noted below is an overview:

Observation	Mexico	Malaysia
<b>Non-Conformities:</b>		
Attributable to RB	2	2
Attributable to Third Party Actions	2	2
Total Non-Conformities	4	4
<b>Opportunities for Improvement:</b>		
Attributable to RB	1	1
Attributable to Third Party Actions	2	1
Total Opportunities for Improvement	3	2

Appendix 1: Summarises RB’s response and corrective actions to the non-conformances and opportunities for improvement identified for the Mexican verification.

Appendix 2: Summarises RB’s response and corrective actions to the non-conformances and opportunities for improvement identified for the Malaysian verification.

Areas of Good Practice:

The verifications also identified the following areas of good practice:

1. Both the Mexican and Malaysian teams had a good awareness of The Policy and applicable Local Codes/legislation.
2. During the Mexican retail visits, no evidence was found of any RB direct promotional activity on point-of-sale advertising, sampling or any other promotional devices to induce sales of Covered Products<sup>2</sup>. In Malaysia, there was no evidence of discounts being offered on Covered Products.
3. No evidence was found of samples of RB Covered Products being provided to HCPs.

<sup>2</sup> Please refer to Article 2 of RB’s Policy and Procedures on the Marketing of Breast-Milk Substitutes (BMS) for a definition of Covered Products.



Conclusion:

The Bureau Veritas verifications are an important part of RB's monitoring processes, and the work conducted in both Mexico and Malaysia identified a number of areas where RB can improve both internal processes and external marketing practices on our portfolio of infant nutrition products. At the date of issuance of this report, all corrective actions necessary to correct the identified non-conformities have been implemented, and actions required to address the identified opportunities for improvement are almost completed.



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

Observation	Response	Corrective Actions	Status
<b>Non-Conformity</b>			
HCP Informational Materials missing mandatory statements (BMS Policy Article 7.2)	The materials reviewed by Bureau Veritas were old materials, that had not been removed from the HCP offices.	No action required. All new materials post September 2018 include all mandatory statements.	N/A.
Educational Materials for the general public missing mandatory statements (BMS Policy Article 4.2)	RB agrees with the observation noted.	Materials amended and internal processes updated to include full requirements of Article 4.2	Completed Q2 2019.
Product Promotion in retail stores (BMS Policy Article 5.3)	RB agrees with the observation noted – although the non-conformance was by a third-party retailer.	Communicated with retailer, updated RB sales team on observation. Additional guidance materials for retailers prepared.	Completed Q1 2019.
Covered Product placement in retail stores (BMS Policy Article 5.3)	In three instances, the shelf banners/wobblers were not specific to RB Covered Products, and were for the infant category overall. In one instance, the Covered Products were placed on an end-of-aisle/gondola end, which Bureau Veritas classify as a premium location.	Raised with the RB commercial team to be aware of how such Covered Product placement will be interpreted. Additional guidance materials for retailers prepared.	Completed Q1 2019.
<b>Opportunities for Improvement</b>			
Contracts with third parties	RB agrees with the observation noted. The contracts reviewed by Bureau Veritas were concluded prior to the introduction of the BMS Policy.	Update all relevant contracts to include appropriate wording in relation to compliance with the BMS Policy.	Completed Q4 2019.
Product Placement in retail stores	The product placement represents the retailer's normal display, and applies to the entire infant category – not specifically RB infant nutrition products.	No actions required. Raised with commercial team for information purposes.	N/A.
Placement of POSM in stores	RB understands the observation.	Communicated with retailer. Updated RB's commercial team.	Completed Q1 2019.



Appendix 2: RB's Response and Corrective Actions to the non-conformance and opportunities for improvement identified – Malaysia Verification.

Observation	Response	Corrective Actions	Status
<b>Non-Conformity</b>			
HCP Informational Materials missing mandatory statements (BMS Policy Article 7.2)	RB agrees with the observation noted.	Update all HCP materials.	Completed, Q3 2019.
Contracts with third parties	RB agrees with the observation noted.	Update all relevant contracts to include appropriate wording in relation to compliance with the BMS Policy.	Completed Q4 2019.
On-line product promotion (BMS Policy Article 5.3)	RB understands the observation, but the product promotion was offered by independent re-sellers via the on-line platform. RB does not have a contractual relationship with the independent re-seller.	Communication to e-commerce platform retailers. Training to be provided to two e-commerce retailers.	Completed Q3 2019.
Covered Product placement in retail stores (BMS Policy Article 5.3)	In two instances, the Covered Products were placed on gondola end display, which Bureau Veritas classify as a premium location.	Raised with retailer with suggestion of using less prominent location.	Completed Q3 2019.
<b>Opportunities for Improvement</b>			
Formalise internal monitoring processes	RB agrees with the observation noted.	Currently developing a standardised global internal monitoring mechanism.	In progress, Q1 2020.
Placement of POSM in stores	RB understands the observation.	No actions required. Raised with commercial team for information purposes.	N/A.