

ABBOTT
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES

Follow-up response

December 9, 2020

Meridian Institute and Signatories of the Breastmilk Substitutes Call to Action:

We appreciate your review of our response to the Call to Action. We want to reinforce that we share the greatest goal: increasing breastfeeding rates and improving the health and wellbeing of children around the world. We agree overwhelmingly in the main and differ only on certain details of how to achieve our common goal.

Signatories' assessment

Ask 1: Publicly commit your company to full compliance with the International Code of Marketing of Breast-milk Substitutes and subsequent resolutions (the Code) globally (including covering of breast-milk substitutes up to 36 months of age), and disclose a concrete plan for achieving this goal by 2030 at the latest, with delineation of clear incremental steps.

The company does not make the requested commitments.

We'd like to provide more information regarding your interpretation of our response, specific to the Call to Action:

- Many of our actions and practices—as outlined in our policy—are aligned with the WHO Code. Our policy is upheld in all jurisdictions where regulations are absent or less stringent than our policy.

ABBOTT
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES

Signatories' assessment

Ask 2: As a first step towards full Code compliance, by the end of 2020, for a company that has a BMS marketing policy in place, ensure that your current policy and practices (including promotion to consumers and healthcare providers) are Code-aligned and for products marketed as suitable for infants between birth and 12 months of age, extend them to all countries, and commit to upholding your policy in all jurisdictions even where regulations are absent or less stringent than your policy. In countries where national law is more stringent than your policy, adherence to national law always takes precedence.

The Signatories note that the scope of the company's current published policy is global for formulas marketed as suitable for infants between 0-6 months of age and applies in higher risk countries only for BMS products marketed as suitable for infants between 6-12 months of age. Further, the policy applies in all jurisdictions where laws and regulations are less stringent than its policy. It makes no statement about its application where there are no regulations in place. To make the requested commitment the company would need to commit to unilaterally extending its policy to all markets for all products marketed as suitable for infants from 0 – 12 months of age.

We await the results of ATNI's forthcoming 2021 BMS Marketing Index to determine the extent to which the company's current policy and practices for these products align to the Code and all subsequent relevant WHA resolutions. The results of the 2018 Index indicated that they did not do so.

- We believe that national governments have the right to determine what's best for their populations and are best positioned to do so. We follow local laws and regulations in all the countries in which we operate and will continue to do so in the future in the event of national legislation changes.

Signatories' assessment

Ask 3: Commit to support the adoption and implementation of national legislation fully aligned with the Code in order to create a level playing field for all companies.

The company does not make the requested commitment.

- We will continue to provide information to the Access to Nutrition Initiative (ATNI) as we do today as part of the BMS Index.

ABBOTT
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES

Signatories' assessment

Ask 4: Agree to provide information on your company's policies and practices to the Access to Nutrition Initiative (ATNI) as requested, recognizing ATNI as an independent actor responsible for monitoring companies' progress toward their plans for achieving Code compliance.

The company makes the requested commitment.

Abbott is included in ATNI's forthcoming 2021 BMS Marketing Index.

As we said in our previous response, we believe that parents—especially mothers—deserve to have accurate information if they can't or choose not to breastfeed. We are bound by ethical and regulatory standards as a healthcare company to be honest and accurate in the information we provide.

We wish to continue to engage with you and the industry to advance our common goal of helping all children around the world grow, stay healthy and achieve their maximum potential. This remains one of the primary goals of our company and we welcome the opportunity to partner to achieve that end.

Regards,



Ann E. Smith
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ABBOTT
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES

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September 25, 2020

Meridian Institute and Signatories of the Breastmilk Substitutes Call to Action:

Abbott has been improving health since 1888. We think this is the most important mission any organization can have, and we view it as a sacred trust. As a result, throughout our long history we have created a steady stream of breakthrough medical products and technologies that have helped people around the globe live fuller, healthier lives.

Science is at the heart of our work. Since our beginning, we've continually advanced medical innovation to improve people's health. Every part of our business—from diagnostics, to medical devices, to medicines, to nutrition—develops and delivers healthy solutions and products that make a difference in people's lives.

In [pediatric health](#), our solutions impact more than 12 million children around the world each day; from creating the world's smallest heart device, to measuring glucose readings without a finger stick, to delivering quality nutrition, often when there's no other option for the patient. We will never give up on doing what it takes to make the world a healthier place in which all children can live fully and reach their potential.

And our concern for human well-being goes far beyond our products, carrying into the way we conduct our business. As a broad-based healthcare innovator, we instill a culture of ethics and compliance that goes beyond structures, policies and procedures and is reflected in our actions across all levels of the company. We hold ourselves to the demanding ethics of medical practice that prevail across the therapeutic areas in which we work; this commits us to a rigorous standard of behavior that applies across all our businesses, including nutrition.

We share the World Health Organization's (WHO) aim of providing a safe source of nutrition for infants and children; and we recognize and appreciate the good intentions that underlie the Code of Marketing of Breast-milk Substitutes (the Code). We are committed to meeting its intended goals and outcomes and to complying with many of its particulars, including:

ABBOTT
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES

- We agree that breastfeeding provides the best nutrition for babies, and we will continue to find even more ways than we do already to support the goal of increasing breastfeeding globally.
- In recognition of the concerns for the safe and ethical use of infant formula, we have developed rigorous marketing policies to ensure that this critically important product is brought to users with care and an emphasis on information about its correct use.
- We comply with all relevant local laws and regulations in every country in which we operate. Where local law is not sufficient and less stringent than our policy, we adhere to our policy.

No organization cares more about the healthy, safe and effective use of our products than we do. We've been trusted by parents for more than a century to help them raise healthy, well-nourished children because of the integrity we demonstrate—in the form of the quality of our products and of the communication, education and support we provide. We take our commitments very seriously and will always strive to ensure our actions reflect our policies and positions. If any of our actions do not adhere to our policies, we respond swiftly to correct those actions.

In regard to the Code, there's an element in it that we believe to be ultimately counterproductive to its own fundamental aim of providing optimal nourishment for babies around the world. Namely, we have concerns with the Code's inherent limitations on—even prevention of—providing factual, evidence-based information to educate parents and healthcare professionals seeking nourishment for babies. Across all our businesses, we are committed to ensuring patients, consumers and healthcare professionals receive information to help them make informed choices about the health and well-being of themselves, their families and their patients. Nutrition is no different. Parents must weigh many factors when deciding how best to feed their children. If they cannot breastfeed—or choose not to do so—high-quality infant formula is the only appropriate, safe alternative to meet babies' nutritional needs. We respect and support every parent's right and ability to make decisions on the most appropriate ways to feed their babies.

This stance is consistent with the WHO's position on free and responsible decision making around family planning and reproductive health.^{1,2} As with those important decisions, we believe in a parent's power and right of choice. And we take seriously our role in entrusting them with evidence-based information to make these important decisions and protect them from choosing sub-optimal—and maybe even dangerous—feeding options due to a lack of information.

Our Commitment to Nutrition

To help people around the world achieve optimal nourishment, we believe the most important goal is addressing malnutrition.

Malnutrition takes many forms. According to the WHO's own data, 47 million children under 5 years of age suffer from wasting, 14.3 million are severely wasted, 144 million are stunted and

ABBOTT
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES

38.3 million are overweight or obese. Around 45% of deaths among children under 5 years of age are related to undernutrition, with most of them occurring in low- and middle-income countries.³

Therefore, over the next ten years, we are focusing on committing our efforts and attention to making a meaningful impact on reducing malnutrition. As a diversified healthcare company with expertise ranging from diagnostics to nutrition, we believe we are uniquely positioned and have a responsibility to deliver solutions that are aligned with the public health agenda. We'll leverage our expertise in pediatric health for an even greater contribution to the health and well-being of all children around the world through access to safe, scientifically-based nutrition solutions.

And we've proven our ability to do so:

- In Haiti, in partnership with the Abbott Fund and Partners In Health, we built local capacity and created long-term change through an [innovative model to fight malnutrition and stimulate the country's economy](#). The result is Nourimanba, a highly nutritious, peanut-based treatment for severely malnourished children.
- In India, the Abbott Fund partnered with PATH to improve its [Ultra Rice®](#), a rice that's [fortified with micronutrients](#) but still looks, cooks and tastes like traditional rice. We went on to help build local production capacity with rice millers in target countries.
- In Vietnam, a lack of knowledge about nutrition and a shortage of nourishing foods contribute to malnutrition in children there, especially in rural villages. In partnership with the Abbott Fund and Americares, Abbott's support has [helped more than 25,000 preschool students in rural provinces](#). The program provides nutritious, locally sourced foods; training for school staff; equipment and medical diagnostic tools; and nutrition educational materials for families.
- In the U.S., more than 22 million schoolchildren rely on meals from school. For more than 15 years, Abbott has partnered with Feeding America to [provide kids with backpacks filled with nutritious foods](#) for themselves and their families.

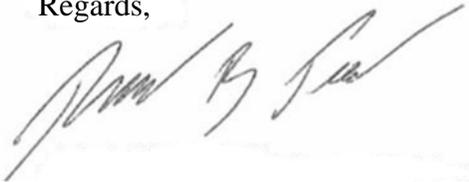
By no means are we dismissing the goals and intent of this Call to Action. But ensuring that infants and children around the world are well-nourished requires a more holistic approach. Just as WHO "aims for a world free of all forms of malnutrition, where all people achieve health and wellbeing,"⁶ we, too, are taking accountability to invest our energy and resources in solutions to treat malnutrition as the complex, multifactorial issue that it is. We'll use the SDGs as a framework to shape and steer our priorities. And we'll align our actions closely with Abbott's sustainability plan, which will drive our performance against the most important environmental, social and governance (ESG) targets over the next ten years. In the coming months, we'll share both our sustainability plan and the roadmap for what our commitment to addressing malnutrition will encompass.

ABBOTT
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES

Working Together

We acknowledge this Call to Action as a way to bring awareness to the public health agenda on malnutrition, especially for children, and as an opportunity to do what we do best—improve the health of the people we serve. We do not take actions contrary to that purpose. We could whole-heartedly endorse a Code that fully values what we believe is most important to serving the people who depend on us: health, science, and the right to be empowered with the information they need to make the best decisions. While the Code does not currently do this, we are committed to working closely with the WHO and other organizations dedicated to improving global health. As is often true of allies, we agree overwhelmingly in the main and differ only on certain details of how to achieve our common goal. That goal is helping all children around the world—whoever they are, wherever they are and however they're fed—grow up healthy to live their fullest lives, and we will never lose sight of it.

Regards,



Robert B. Ford
President and Chief Executive Officer, Abbott

Sources:

1. <https://www.who.int/news-room/fact-sheets/detail/family-planning-contraception>
2. https://www.who.int/health-topics/abortion#tab=tab_1
3. <https://www.who.int/news-room/fact-sheets/detail/malnutrition>
4. <https://www.un.org/sustainabledevelopment/development-agenda/>
5. <https://scalingupnutrition.org/nutrition/nutrition-and-the-sustainable-development-goals/#:~:text=Without%20adequate%20and%20sustained%20investments,are%20highly%20relevant%20to%20nutrition.>
6. <https://www.who.int/news-room/fact-sheets/detail/malnutrition>