Sponsorship of Health Workers and Institutions for Professional Development and Scientific Research
WHO recommends exclusive breastfeeding for the first 6 months. Nestlé fully supports this and continued breastfeeding, along with the introduction of complementary foods as advised by doctors or health authority.

1. Introduction

These Guidelines aim at complementing the relevant sections of the Nestlé Policy and Procedures for the Implementation of the WHO International Code of Marketing of Breast milk Substitutes, and the Illustrated Guidelines for Relations with the Healthcare System issued in July 2011 with more detailed guidance on how Nestlé should deal with sponsorship of research and health workers and institutions in line with the Aim and Principle of the WHO Code.

These guidelines equally apply to all Nestlé Nutrition businesses (Nestlé Infant Nutrition and Wyeth Infant Nutrition affiliates) in higher and lower risk markets. Throughout this document, “Nestlé Nutrition” shall refer to both Nestlé Infant Nutrition (NIN) and Wyeth Infant Nutrition (WIN).

Our overall policy is to adhere to the national measures implementing the WHO Code in all countries. In higher-risk countries our policy is to adhere to the relevant provisions of the Nestlé Policy and Instructions for Implementation of the WHO Code, or to the national regulations when those are stricter than the WHO Code. In lower-risk countries, we abide by national regulations implementing the WHO Code.

Each market should therefore check whether there are additional restrictions that apply stemming from national regulations, applicable codes of conduct of health workers and their institutions in the countries where the business plans to conduct the sponsorship activity.

Country specific requirements should accordingly be properly reflected in the relevant policies and procedures of the WHO Code Management System applicable to the country.

2. Rationale for sponsorship of research and health workers and institutions in scientific domains related to infant and young child nutrition

Advancing the science of nutrition is at the core of our strategy in the field of infant and young child nutrition.

Extensive collaboration with leading universities and research institutes worldwide and appropriate interaction with the scientific and medical community, help us make products come to life through science and innovation. That interaction represents an important contribution towards making available infant nutrition products that are:
- science-based;
- supported by sound clinical validations;
- endorsed by opinion leaders and health practitioners.

Health workers and healthcare institutions play an essential role in guiding and influencing infant and young child feeding practices when they can provide objective, updated science-based advice about nutrition and appropriate feeding options.

Accurately informed health workers can best help parents to exercise their right to make informed choices about what works best for their personal situation and their baby’s nutritional needs when they are not breastfed. The WHO Code supports the fact that it is important that health workers are updated about infant nutrition products.
developed or improved by manufacturers, that the information given by companies about their products is objective, scientific and factual, and does not imply that bottle-feeding is equivalent or superior to breast-feeding.

Manufacturers of breast-milk substitutes can provide to health workers sponsorships towards research, continued education, or attendance to professional conferences or similar events, as long as such sponsorships do not constitute financial and/or material inducements to health workers to promote breast-milk substitutes to the detriment of breastfeeding, and are handled in accordance with a transparent process. Symposia, congresses and similar scientific events help disseminate relevant scientific or clinical knowledge and experience to and between health workers. Information to update health workers on translation of the latest R&D into new technology or evolution of product properties may be shared with health workers within the framework of professional meetings. This is a common practice for the majority of manufacturers of breast-milk substitutes.

Articles 7.3 and 7.5 of the WHO Code set forth the principles to be respected in this perspective.

**Article 7.3 of the WHO Code**

No financial or material inducements to promote products within the scope of this Code should be offered by manufacturers or distributors to health workers or Members of their families, nor should these be accepted by health workers or members of their families.

**Article 7.5 of the WHO Code**

Manufacturers and distributors of products within the scope of this Code should disclose to the institution to which a recipient health worker is affiliated any contribution made to him or on his behalf for fellowships, study tours, research grants, attendance at professional conferences or the like. Similar disclosures should be made by the recipient.

### 3. Overall Principles

In conducting sponsorship activities, we will comply at all times and in all cases with:

- local regulations and by-laws, when these are stricter than our internal policies;
- the applicable Nestlé policies and procedures;
- all relevant aspects of national codes of conduct of health workers and their institutions.

It is the local market’s responsibility to check compliance with all of the above in processing sponsorships, and ensure that the strictest requirements are applied. The following principles will apply to any of the sponsorship and funding activities directed to health workers and/or their institutions:

**Principle:** Sponsorship must not be a reward to favoured health worker or institution, or an inducement to recommend, prescribe or purchase our breast-milk substitutes or related services. The sponsorship does not imply endorsement by the recipients of Nestlé’s policies or activities.

**Purpose:** All sponsored activities will be linked to the scientific and medical aspects of nutrition and health of women of child-bearing age, infants and young children which could encompass good nutrition of mothers, optimal breastfeeding, adequate introduction of complementary food, and/or supporting the professional development of health workers, with the aim of improving quality of care, notably through better nutrition education and the development of the best products.

**Scope:** These guidelines must be followed in conducting all sponsorship activities.
Transparency: The sponsorship must preferably be given to support for nominees of associations and institutions. Requests for support must be confirmed in writing by a responsible officer of the association/institution (or his nominee) or by the health worker concerned. The activity and the sponsorship should be disclosed by Nestlé to the institution or professional association to which the health worker is affiliated.

Approval: The decision to sponsor health workers and institutions must be taken on a case-by-case basis. All activities must be approved by the Infant Nutrition Country Business Manager (IN CBM) or in line with the de minimis thresholds laid out in the Nestlé WHO Code Procedure Manual of the Country.

Documentation: All relevant records must ensure traceability and must be kept for a minimum period of 36 months (or longer, if so required by local regulations).

For further clarification on the implementation of this Policy and in case of doubt about any of the above, the NN Functional Development and Compliance department at the Headquarters must be consulted, which will provide additional guidance in coordination with our Corporate Public Affairs department. All activities must be compliant as of the official date of publication of this document.

4. Kinds of sponsorship activities and related guidelines

4.1 Research and Educational activities

We may provide funds to support genuine independent research, advancement of science or education, or patient and public education in relation to maternal, infant and young child nutrition. Research may be initiated and organized by a university or a recognized third party institute.

The NN Medical Director from the Market/Region where the research is being conducted is responsible to ensure that the sponsored research, which is consequently under Nestlé’s responsibility, complies with all local regulations, ethical requirements and Nestlé Instructions. It is the NN Medical Director responsibility to ensure that the approval of the research by the Clinical Trial Decision Committee at the NRC has been obtained, whenever applicable. Unconditional grants are not allowed for researches related to maternal, infant and young child nutrition.

These sponsorship funds should whenever possible be extended to organizations or entities entitled to receive them under applicable laws and regulations and should not be remitted to individual health workers, unless permitted under applicable laws.

4.2 Academic activities and scholarships

In recognition of the value to the healthcare system of such sponsorship, we may also sponsor health workers to benefit from academic activities. Activities might include funding of attendance at a course or seminar or funding for further education, such as fellowships, study tours and research grants.

Decisions to fund academic activities must follow strict procedures and must be solely based on their academic merits (such as their relevance to the health care profession) and the inherent bona fide interests in advancing education or science-based knowledge.

Ensure that any contributions made do not create the impression of, or represent endorsement of, Nestlé Nutrition’s activities or infant nutrition products by the recipient.

4.3 Attendance to scientific congresses, conferences and events either organized by third parties or Nestlé Nutrition, including Nestlé Nutrition Institute.

Principle: In order to facilitate continuing professional development and training, and subject to relevant laws and regulations, a contribution to a health worker for attendance at scientific conferences and symposia is allowed.

Purpose: Nestlé will only sponsor attendance by health workers to symposia, congresses and other scientific meetings (“Events”) which aim at sharing balanced, useful and accurate scientific or educational information on health and nutrition matters, as outlined in the Overall Principles of this document.
**Transparency:** Sponsorship of individual health worker participation to such events should always be conducted in a transparent manner, as outlined in the aforesaid Overall Principles:

- For health workers affiliated to an institution, the funding of the activity and its recipient should always be disclosed in writing to the institution or professional association to which the health worker is affiliated.
- In case of independent health workers, the sponsorship has to be supported by the related documentation, including evidence of correspondence between Nestlé Nutrition and the health worker on the subject. Such correspondence should clearly include the scope of the sponsorship and the purpose or event to which it is linked. Those cases should be validated by the Code Compliance Committee of the Market of residence of the health worker, wherever they are in place, or else by a member of the management committee of the local Nestlé Company.

**Funding:** Conflicts of interests must be avoided. Thus, we shall not organize or sponsor an event unless the following requirements are met:

- Sponsorship of health workers is limited to the payment of travel, meals, accommodation and registration fees;
- No payments are made to compensate health workers for time spent in attending the Event;
- No payment is made in relation to costs associated with individuals accompanying invited health workers, unless such individuals independently qualify for payment of such costs.

**Limits of Hospitality:** Hospitality shall be limited to refreshments and/or meals incidental to the main purpose of the Event and shall only be provided to participants of the Event and not their guests if to do so is moderate and reasonable under local standards. As a general rule, the hospitality provided may not exceed what health worker recipients would normally be prepared to pay for themselves, taking into account the local context.

**Entertainment:**

- No stand-alone entertainment or other leisure or social activities shall be provided or paid for.
- As part of events, entertainment is allowed. However, entertainment should not be lavish or extravagant taking into account the local context so that it does not undermine or supersede the scientific and educational purpose of the event.

4.4 **Attendance to professional meetings initiated by Nestlé Nutrition**

**Principle:** Besides scientific meetings, symposia and congresses, the WHO Code also allows manufacturers to disseminate objective, factual and science-based information on products or solutions pertaining to infant and young children nutrition to health workers, provided that the information is objective, factual and science-based (Articles 6.2 and 7.2).

**Purpose:** In line with those articles, the Company may organize professional meetings aiming at sharing with health workers knowledge related to products and evolution that may help health workers make independent yet fully informed decisions regarding the use of those products or solutions.

**Venue:** Events organized/initiated by Nestlé Nutrition shall be held in an appropriate venue that is conducive to the main purpose of the Event or meeting. Extravagant venues are to be avoided.

The event should be, whenever possible, be organized in the city or region where the majority of the attending health workers come from. It may not be organized abroad, and no financial support may be extended to a health worker for attendance to such professional meetings outside of his country, unless obvious geographic or logistical constraints should dictate otherwise, such as constraints stemming from public transportation networks or the expediency of organizing only one meeting for health workers from several small countries.

When the situation requires, funding, limits of hospitality an entertainment may be provided within the limits set forth under item 4.3.

**Speaker fees:** Payments of fees to health workers who are providing genuine services as speakers, presenters or moderators at the Event are allowed on the basis of a written contract with the company:

- Speaker fees must be of a reasonable nature (fair market value).
- Reimbursement of expenses incurred for the contribution to the event is allowed - e.g. travel and accommodation costs and incidental meals.
- These guidelines on speaker fees also apply to those events classified under item 4.3.
4.5 Visits to Nestlé R&D centers, laboratories and factories

Such visits may be organized for the purposes of providing health workers with information on scientific or technical developments being conducted in those centers or factories, or in situ training on technical or scientific matters relating to nutrition and health, or to establish research projects.

Funding, Limits of Hospitality and Entertainment: the principles set forth under item 4.3 also apply to visits to Nestlé facilities.

Visits to Nestlé facilities shall constitute part of a professional development or scientific research activity.

4.6 Consulting arrangements with health workers

We may enter into bona fide consulting arrangements with health workers. Health workers who provide genuine advisory services under bona fide consulting arrangements may be offered reasonable, fair-market compensation for those services and reimbursement for reasonable travel, lodging and meal expenses incurred as part of providing those services. All such arrangements must be fully documented and approved by the local Nestlé Legal department.

5. General purchasing and payment procedures

The below rules are to be followed for the purchasing and payment procedures of all sponsorship activities and associated costs:

Transparency: Any payment or transfer of funds for any of the purposes listed above should be processed so as to ensure full traceability throughout the whole process, in accordance with all applicable Nestlé procedures. As a consequence, payments of generic budgets to agencies/associations or forfait reimbursements of amounts to health workers, without any visibility or proof of the actual costs incurred, are not allowed.

Vendors: All purchases must be made exclusively through suppliers approved by the Procurement department of the local Nestlé company, following the applicable vendor selection procedures. As an example, payment for travel by a health worker to a congress or seminar must be made through the Nestlé approved travel agent or event organizers directly, and not to the individual health worker.

Documentation: Genuine supporting documentation, must always be obtained in a timely manner, verified and filed for 36 months. Examples of supporting documentation would be proof of payment for travel, accommodation and event registration costs.

Payment Systems: Payments must be made by way of the SAP system and must not be made in cash. Credit Cards or ‘Travel and Expenses’ accounts may only be used for sundry purchases for health care institutions or health workers up to the equivalent of CHF 200.- per person (e.g. coffee breaks, lunch or dinner). Where this is not possible, payments may be made by cheque or by bank transfer provided proof of purchase and delivery is always verified by Nestlé Nutrition.

Any exception must be exclusively authorized by way of specific written approval by the IN CBM/GM in agreement with Nestlé Nutrition management in Vevey.