UNILEVER’S POSITION ON NUTRITION AND HEALTH CLAIMS

Background
At the heart of our business and our brands is a deep commitment to consumers. More than 1 billion people enjoy our food and refreshment products every day. We know that people want and expect superior quality products that are healthy and tasty. We are very conscious of the important role that food has in people’s well-being and that non-communicable diseases are a high public health priority. Therefore, we are offering nutritious foods that are appealing and communication that is responsible, engaging, and meaningful.

Context
We have set our ambition to become a more progressive food company, putting our consumers at the heart of everything we do. Working to build consumer trust in our foods through transparency, as well as delivering the targets set out in our ‘Future Foods’ ambition.

We put consumers front and centre of all our policy making and positioning. As part of that effort, we will continue to support initiatives that help consumers make a positive choice with regards to their nutrition.

We recognize that product claims are also used by consumers to make their choices. Two types of claims are nutrition claims and health claims. Nutrition claim means any representation which states, suggests, or implies that a food has particular nutritional properties, including but not limited to the energy value and to the content of protein, fat and carbohydrates, as well as the content of vitamins and minerals. Health claim means any representation that states,
suggests, or implies that a relationship exists between a food or a constituent of that food and health.

**Unilever Position**

The intention of all nutrition and health claims, whether included on-pack or through other marketing channels, is to provide consumers with relevant and concise nutrition information about products to help them make informed, healthier choices.

Unilever nutrition and health claims are reviewed against a set of criteria which cover:

- Scientific substantiation of the claimed health relationship or benefit (where relevant)
- Nutrient profile of the product making the claim
- Unilever’s Food and Beverage Marketing Principles
- Legal & regulatory frameworks

**Scientific substantiation**

Unilever has a scientific health claim evaluation process in place which includes an internal expert panel that is responsible for evaluating the strength of evidence for health claims for its foods and refreshment portfolio. The panel keeps records of the scientific substantiation, including their scientific advice on the use of the claims. To ensure that claims remain in line with developing science, there is a periodic review of our health claims. We also recognize that some consumers have a strong belief about the relationship between certain plants and well-being, which is primarily based on traditional knowledge. When providing consumers with products which communicate these benefits, we ensure that consumers are clearly informed that the statement used is based on traditional knowledge.
Nutrient Profiles

Unilever uses Nutrient Profiles that are based on dietary recommendations to evaluate the overall nutritional composition of all our products. To define a product’s suitability for a nutrition or health claim, Unilever scores the product against Unilever’s Nutrition Criteria. The result of that determines if and what type of nutrition or health claims are acceptable on these products. In addition, we commit to make nutrition and health claims on fortified products only when they meet relevant Codex standards and the WHO/FAO Guidelines on Food Fortification with Micronutrients.

Marketing principles

All food and refreshment marketing communications must be truthful and not misleading. In addition to following existing legal requirements and obligations, Unilever also adheres to our own Food and Beverage Marketing Principles and Principles on Responsible Food & Beverage Marketing to Children.

Legal and regulatory frameworks

Unilever supports science-based regulations for nutrition and health claims, with scientific data that has undergone independent scientific review, and acknowledges the different regulatory frameworks throughout the world. We are committed to complying with existing regulations. We apply local regulations or voluntary industry standards if they exist and are stricter than the Unilever Nutrition Criteria.

Where no legislation exists or is under development, we support global convergence by encouraging the use of the Codex Guidelines on Nutrition and Health Claims (CAC/GL 23-1997) as the basis for regulations. In these countries where no legislation exists, we commit that all nutrition and health claims made on a product will be in full compliance with the Codex guidelines.

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