



RB's Human Rights
Action Plan (HRAP)

Human Rights
Impact Assessment
– Durex and Enfa
value chains in
Thailand





1. Who we are

Reckitt Benckiser Group plc (RB) is a FTSE 20, global consumer health, hygiene and nutrition company headquartered in the UK with an annual net revenue of £12.8 billion. RB is driven by its purpose to protect, heal and nurture in the relentless pursuit of a cleaner, healthier world. We fight to make access to the highest quality hygiene, wellness and nourishment a right, not a privilege, for everyone.

RB is proud to have a staple of trusted household brands found in households in more than 190 countries. These include Enfamil, Nutramigen, Nurofen, Strepsils, Gaviscon, Mucinex, Durex, Scholl, Clearasil, Lysol, Dettol, Veet, Harpic, Cillit Bang, Mortein, Finish, Vanish, Calgon, Woolite, Air Wick and more. Over 20 million of our products are bought by consumers globally every day.

Hygiene	Health	Nutrition
For a pest, odour, germ and dirt-free world	A healthier world powered by self-care, hygiene, sexual wellbeing and wellness	Nutrition for every stage of life
		

RB's passion to put consumers and people first; to seek out new opportunities; to strive for excellence in all that we do; and to build shared success with all our partners, while doing the right thing, always; is what guides the work of our 40,000+ diverse and talented colleagues worldwide. We apply those values throughout our global value chain, and they support our fight to ensure human rights are respected.





2. RB's commitment to respecting Human Rights

We bring our purpose to life through our purpose-led brands, within our operations, and across our entire value chain. In doing so, our aim is always to produce and distribute our brands with full respect for all the people touched by our value chain.

We are committed to identifying, avoiding and addressing any negative impacts on human rights and our policy outlines our standards and expectations for those we work with. If we are directly linked to adverse impacts on human rights, we will use our leverage to enable remedy in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We recognise the complexity of human rights issues and the limitations on what we are directly able to control and influence. Accordingly, our approach to prevent, mitigate and remediate focuses on stakeholder collaboration and transparency.

Human rights risks are dynamic and constantly evolving. We are committed to continually improving our approach to ensure human rights are respected along our value chain, keeping abreast of emerging issues. As part of this, in 2019 we established a partnership with the Danish Institute for Human Rights, (DIHR) to help us develop our approach for ensuring human rights are respected as we look to evolve from a focus primarily on core labour rights within our supply chain to a more holistic view of human rights impacts along our entire value chain.

As part of our collaboration, the DIHR supported us in assessing our human rights performance at a corporate level through the lens of the UNGPs. This led to 35 recommendations for improving our day-to-day activities. The recommendations ranged from how we embed human rights into our corporate policies and procedures, through to our positioning on specific issues such as contract labour management, procurement practices, company tax payments, working hours, wages, and human rights training. We have reviewed and prioritised these recommendations and are beginning a series of activities to adapt our approach with them in mind.

The DIHR also conducted our first country-level, value chain Human Rights Impact Assessment (HRIA). This has brought further learnings for how we support human rights in our work, and we will carry our similar assessments elsewhere in the world in future. More details of this HRIA and the subsequent actions we are taking are outlined in this action plan.

Further information on our human rights policies, programme and progress are available in our:

- [Policy on Human Rights and Responsible Business](#) and associated [Detailed Requirements](#)
- [Policy on the Responsible Sourcing of Natural Raw Material](#) and associated [Standard](#)
- [2019 Modern Slavery Report](#)
- [2019 Sustainability Insights](#)



3. Thailand HRIA - Context and approach

The HRIA aimed to identify actual and potential human rights impacts caused by, contributed, or directly linked to our Durex condom and Enfa brand value chains within Thailand.

Thailand was chosen for this first HRIA as it is one of our largest 15 markets. RB also has a large operational presence in Thailand, including: three manufacturing sites supported by a large number of raw and packaging material suppliers; a R&D centre of excellence for our global sexual health and wellbeing category; and commercial offices selling a range of health, hygiene and nutrition brands to consumers. Additionally, there are recognised human rights risks at every stage of the Thai value chain, posing challenges for many organisations operating there.

The assessment specifically focused on our Durex and Enfa brands due to their brand purpose, product nature and significance within RB's business.

Durex

[Durex](#) is the world's leading condom brand with sales in over 150 countries. The majority of Durex condoms are manufactured from natural latex, sourced from Malaysia and smallholders in Surat Thani, Thailand. A significant proportion of Durex condoms are manufactured at RB's Bangpakong facility, for both local consumption and export.

As a brand, Durex believes the world of sex is ever-changing. Society is becoming both more open-minded and responsible and, in other areas, remaining repressive and precarious. Durex views good sex as a human right and aims to lead positive change in the world of sex.

As a purposeful brand with a particular focus on sexual and reproductive health and rights, Durex has the potential to create significant positive impact within this space. With RB's large supply chain and operational presence in Thailand, we recognise that there are both positive and negative human rights impact along our value chain. As a result, it is important for us to understand these and through using our leverage take concrete action to address them.

Enfa

[Enfa](#) is one of the world's leading infant and child milk formulation franchises, with more than 70 products sold in over 50 countries. Key brands include Enfamil, Enfagrow and Enfinitas, and use the highest quality milk for all of their products from New Zealand, Australia, the Netherlands, Ireland and the United States.

For Enfa's operations in Thailand, milk base (containing whey protein, lactose, casein, high protein skimmed milk powder and at times some specialities depending on the formulation) is imported from RB's factory in Singapore. Enfa's site in Chonburi, outside



Bangkok, packages consumer products for the local Thai market and export throughout the region.

RB plays a significant role in the breast-milk substitute (BMS) sector - marketing products ethically and responsibly at all times. If a mother is not able to, or chooses not to breastfeed her child, RB aims to provide the highest quality and most nutritious products possible, developed through investment in science-led research and development programmes.

Through the Enfa brand, RB aims to support consumers across all life stages, especially during the first 1000 days. We acknowledge the importance of the International Code of Marketing of Breast-Milk Substitutes, issued in 1981, commonly referred to as “The WHO Code” and subsequent relevant World Health Assembly (WHA) resolutions as implemented by governments.

RB supports and promotes the recommendations of the World Health Organisation (WHO) for exclusive breastfeeding in the first six months, and the introduction of safe, age-appropriate, nutritious complementary foods thereafter. We advocate continued breastfeeding up to two years of age and beyond.

In 2018, after acquiring Mead Johnson Nutrition (MJN), RB introduced its first Policy and Procedures on the Marketing of Breast-Milk Substitutes (“[BMS Marketing Policy](#)”). This policy established RB’s mandatory marketing practices on BMS, supporting the aims and principles of the WHO Code of 1981.

Industry has a key responsibility to implement, enforce and monitor appropriate policies and procedures to ensure marketing practices do not undermine a mother’s choice, and that families have access to the right information to make informed choices regarding the best feeding options for their infants.

RB is committed to putting people and consumers first and doing the right thing. Understanding the actual and potential human rights impacts in Thailand allows RB to take steps either independently or through wider industry collaboration to address these. Thailand was selected for this review given the sensitive issues surrounding BMS marketing practices, and the scale of the Enfa business in Thailand.

Key developments



In December 2019, RB introduced a Global Parental Leave Policy providing 26 weeks fully paid parental leave to all employees globally. In Thailand, this policy was recognised by the Department of Women’s Affairs and Family Development as best practice.



In 2020, RB joined UNFPA’s “Safe birth Even Here” campaign, to secure access to safe births in difficult contexts. During the COVID-19 pandemic, Thailand was one of three countries in focus, together with the Philippines and Mexico.

<https://www.unfpa.org/safebirth#/en>



4. Our Purpose and Fight has never been more relevant

We exist to protect, heal and nurture in the relentless pursuit of a cleaner and healthier world. Our purpose has never been more relevant as it is today as we fight to make access to the highest quality hygiene, wellness and nourishment a right, not a privilege.

COVID-19 has had immense impact on countries, businesses, supply chains, workforces and communities globally with a whole host of cascading economic and human impacts; however, the impact has not been equal. The most vulnerable have been disproportionately affected.

We have a critical role to play in tackling the direct and indirect impacts of COVID-19 across our value chain by:

- Ensuring consumers gain access to the products they need to break the chain of infection.
- Ensuring the health & safety of people within our organisation.
- Ensuring the rights and wellbeing of people within our supply chain.

Although this HRIA was conducted prior to COVID-19 and therefore did not consider the subsequent impacts, we shall apply a COVID-19 lens on our activities as we move forward to ensure we identify and adequately address COVID-19 related human rights and social impacts.

5. Thailand HRIA - Priority objectives and actions

Activities to address the HRIA findings and recommendations are described below.

Value chain phase	Brand	DIHR HRIA Recommendation Reference	Focus area	RB activity	Functional ownership	KPIs	Timeframe
Upstream supply chain	Durex	1	Tackle systemic human rights issues upstream in our latex value chain through partnerships and advocating multi-stakeholder initiatives.	<p>We will implement a programme to enable stronger, more resilient livelihoods for latex smallholder farmer communities in Surat Thani, Thailand. This will involve engaging with farmers and their communities, supported by NGOs and other relevant local stakeholders, to deliver both economic and farming benefits, in addition to tackling the human rights issues identified through this HRIA.</p> <p>The programme will be delivered through strengthening existing farmer groups to enable investment in sustainable farming practices, supported through farmer training and agronomy. Farmer groups will maintain an on-going focus on addressing human rights issues (e.g. migrant workers, land rights, health and safety, biodiversity management, etc.) in addition to, promoting women's economic empowerment and the roles women play in these communities.</p> <p>Farmer groups will be empowered to develop wider multi-stakeholder initiatives (NGOs, local government authorities, etc.) in order to tackle on-going and newly identified environmental, social and human rights issues. We shall look to share learnings from our collaboration with civil society and the wider natural rubber sector to drive wider respect for human rights.</p>	Procurement & Sustainability	<p>Smallholder famers supplying Latex used by RB:</p> <ul style="list-style-type: none"> • Implementation of the programme (e.g. # of training workshops, farmer attendance) • % of farmers included in farmer groups • # farmers trained in agroforestry • # farmer groups achieving communal land title <p>On-going review of additional human rights issues identified and the need for further activity or multi-stakeholder partnerships.</p>	2021-2023
		2	Support smallholder latex farmers and tappers earn a living income and achieve decent living standards.	<p>Programmes on agronomy and farm management will empower farmers to adopt more sustainable farming practices (e.g. maintaining healthy soils, disease management, rubber clones) to drive both latex yield and quality (increased dry rubber content) and increase the potential for greater trade with RB in future.</p> <p>Progressive training on livelihood diversification (e.g. livestock raising) will encourage and support farmer group investment in additional livelihoods, strengthening viability of rubber production in the longer term.</p>	Procurement & Sustainability	<p>Smallholder famers supplying Latex used by RB:</p> <ul style="list-style-type: none"> • % increase in income from latex • % farmers adopting improved agricultural practices • % kg increase latex yield, # of farmers reporting increase • % improvement in DRC content/ latex quality • #/% of farmers trained on livelihoods diversification 	2021-2023



				These activities will increase farmer / tapper income and economic resilience; thereby, enabling them to achieve improved living standards.		<ul style="list-style-type: none"> • #/% of farmers adopting diversified income streams • Increase in household income through diversified livelihoods (and latex farming) 	
		3	Improve the social and environmental sustainability of natural rubber farming through commercial incentive structures.	<p>This programme will support strengthened livelihoods, considering household incomes derived from price and productivity of farms and other potential income streams. Strengthening farm productivity via stronger agronomy and agroforestry methods, which will persevere the local farming ecosystem and support local forest systems by reducing the need for further cropping that would erode those forests. This will include training on agroforestry and identification and management of High Conservation Value (HCV) and High Carbon Stock (HCS) forest, ensuring the ecological sustainability of latex production in our supply chain.</p> <p>The programme will also focus on working practices within the farm, including the handling of latex and ammonia and the associated safety precautions that need to be taken, such as use of personal protective equipment (PPE) to better safeguard farmer/tapper welfare.</p>	Procurement & Sustainability	<p>Smallholder famers supplying Latex used by RB:</p> <ul style="list-style-type: none"> • #/% of farmers trained on: <ul style="list-style-type: none"> - Agroforestry - HCV/ HCS identification and management • #/% of farmers adopting agroforestry practices • #/% of famers trained on health & safety and chemical handling • #/% of collection centres with ammonia handling and storage control measures • % farmers using PPE • Absence of forest erosion • Reforestation indicators 	2021-2023
		4	Extend our existing partnership with the Plan Parenthood Association of Thailand (PPAT) to improve sexual and reproductive health of workers in RB's latex supplier factory and rubber plantations in Surat Thani province.	<p>In 2020, we engaged PPAT and RB's latex supplier to:</p> <ol style="list-style-type: none"> 1. Equip 850 Thai and Myanmar workers in latex factories, rubber plantations and collection centers in communities with accurate knowledge about sexual and reproductive health and rights (SRHR) including family planning, contraceptive use, and condom use for STIs and HIV prevention based on Comprehensive Sexuality Education (CSE) framework. 2. Increase access of Thai and Myanmar workers in 2 latex factories and tappers in 10 rubber plantations to right-based and gender-sensitive sexual and reproductive health (SRH) services in Surat Thani District. <p>In 2021, we shall explore how the scope of our partnership can further evolve for 2021 and beyond to tackle additional health and sexual wellbeing risks identified through this HRIA.</p>	Global Durex Marketing	<p>Objective 1:</p> <ul style="list-style-type: none"> • 861 workers receiving accurate information • 6 sexual health drop-in clinics established • 23 peer educators trained • Workshops conducted for 17 service providers <p>Objective 2:</p> <ul style="list-style-type: none"> • 477 mobile medical services personnel • 35,426 condoms, 973 lubricants, 727 oral contraceptives distributed to 241 people • 92 women received Pap Smear. 	<p>Complete</p> <p>Complete</p> <p>2021</p>
	Enfa	30 & 31	Obtain a greater understanding of dairy import practices in Thailand and other high-risk markets.	Define a suitable methodology and identify partners to assess the potential adverse impacts of dairy imports on the local dairy industry and farming communities in Thailand and other key high-risk markets.	Procurement, Marketing & Sustainability	<ul style="list-style-type: none"> • Define suitable methodology, partners, target markets and timeline for assessments 	2022-2023
Direct suppliers	Durex	5 & 6	Enhance the social and environmental performance of our latex supplier's processing facility.	Develop a closer collaborative partnership with our latex supplier by establishing local RB support to provide on-site capability building to	Procurement & Sustainability	<ul style="list-style-type: none"> • Local RB support in place • # hours of capability building provided 	2021



			<i>Key issues include living wages, working hours, worker health & safety, migrant worker accommodation and employment, etc.</i>	elevate standards at their facility to address the issues identified through this HRIA.		<ul style="list-style-type: none"> • #/% of issues addressed and performance maintained (verified through audits and capacity building) 	
Direct suppliers	Durex & Enfa	27	Enhance our qualification process for raw and packaging material suppliers to strengthen coverage of RB's social and environmental requirements.	<p>Ensure environment and human rights requirements are communicated to vendors, integrated into commercial contracts and enacted by suppliers.</p> <p>Assess performance of existing and potential vendors through regular audits / assessments.</p> <p>Conduct a review of our Procurement practices to ensure they support the delivery of RB's social and environmental standards within our supply chain.</p>	Procurement & Sustainability	<ul style="list-style-type: none"> • % of supplier agreements including RB's Sustainability requirements • % of RB's direct suppliers assessed • Procurement practices review completed 	2020-2021
		29	Enhance the social and environmental performance of our 4PL Distribution Center. <i>Key issues include working hours of contract labour, living wages, health & safety and employment contracts.</i>	Develop a closer collaborative partnership with our distribution centre by establishing local RB support to provide on-site capability building to elevate standards at their facility to address the issues identified through this HRIA.	Supply Services & Sustainability	<ul style="list-style-type: none"> • Local RB support in place • # hours of capability building provided • #/% of issues addressed and performance maintained (verified through audits and capacity building) 	2021
		28	Further enhance the robustness of RB's Human Rights and Responsible Business programme based on the learnings from this HRIA.	<p>Expand the scope of the programme by including additional supplier categories, including a greater focus on contract / 3rd party labour.</p> <p>Greater integration of a human rights lens into RB's supply chain risk assessment methodology.</p> <p>Review and update RB's audit approach to better capture 'worker voice'.</p> <p>Develop a site level grievance mechanism toolkit for suppliers and support suppliers implement effective site-level grievance mechanisms. The effectiveness of these mechanisms will be assessed through our existing audit and capability building programme.</p>	Sustainability	<ul style="list-style-type: none"> • # of additional supplier categories added to the programme • Updated supply chain risk assessment • # of workers reached through worker voice • Supply chain grievance mechanisms toolkit developed and deployed <ul style="list-style-type: none"> ○ # grievances received ○ # grievances addressed 	2020-2022
Own operations	Durex & Enfa	7 & 25	Integration of formalised social performance targets in the incentive structure for factory management.	Factory management teams are responsible for implementing relevant recommendations from this HRIA and ensuring full compliance with RB's Human Rights policy as part of existing performance reviews and associated reward. A broader review of RB's global performance incentive structure is currently underway and will consider non-financial objectives.	Human Resources	<ul style="list-style-type: none"> • Maintenance of Human Rights audit performance and associated close out of corrective actions • Completion of global performance incentive review 	2021-2022
		8 &	Improve the social and environmental performance of our	Develop and implement a corrective action plan for the issues identified within the DIHR factory feedback sheet. Actions to include:	Manufacturing & Human Resources	<ul style="list-style-type: none"> • #/% of issues addressed and performance maintained 	2020-2022



		26	Durex and Enfa manufacturing facilities. <i>Key issues include workplace health & safety, contract labour management, working hours, living wage and grievance mechanisms.</i>	<ul style="list-style-type: none"> • Training on the UNGPs for site management and grievance mechanisms for all workers. • Evaluating working hours and rates of pay, relative to local practice and needs, and in line with international standards, especially in the case of temporary contracted labour. • Evaluate use of temporary labour beyond seasonal needs. • Enhancing contract labour management. • Further evaluate occupational health and safety measures, i.e. ammonia exposure, ergonomics, etc. <p>Monitor performance routinely via RB's Human Rights, Environment and Health & Safety teams.</p> <p>To date, we have made good progress in a number of areas including ensuring site grievance mechanisms are accessible to all workers, data privacy, evaluating roles performed by temporary workers and understanding health & safety risks and mitigation measures. Further work is required around contract labour management, wages and working hours as they are systemic challenges across Thailand, which we plan to progress in 2021 and 2022.</p>		<i>(verified through audits and capacity building)</i>	
		9	Increase collaboration and best practice sharing on workplace management (human resources, health & safety and environment) between RB factories.	HR Managers across all RB's factories in Thailand work closely together on an ongoing basis to discuss challenges, share best practice and align on approaches, including collaborating on multiple projects. Environment, Health & Safety (EHS) Managers also have monthly meetings and rotate to visit each site, although physical meetings have temporarily ceased due to COVID-19. The most recent meeting was held in February 2020 at our Chonburi factory, where EHS Managers together with the Safety Committee participated in the meeting. During this meeting our Union Leader from Bangpakong Factory also joined as part of the Safety Committee.	Manufacturing & Human Resources	• N/A	Complete
Customers / consumers	Durex	10, 11, 12 & 13	Assess whether there is a condom deficiency in Thailand, identify opportunities to overcome potential cultural barriers to condom use and increase access to condoms, particularly for at risk populations, in collaboration with suitable partners.	<p>Conduct consumer research to identify potential barriers to purchasing and using condoms in Thailand.</p> <p>Conduct an Availability, Accessibility, Acceptability and Quality "AAAQ" review of Durex condoms in Thailand in collaboration with an external organisation.</p> <p>Identify opportunities for RB to overcome potential barriers identified through the AAAQ review.</p> <p>Building off this pilot, expand approach to other brands and markets.</p>	Marketing & Regulatory	<ul style="list-style-type: none"> • Completion of consumer market research • Completion of an AAAQ assessment and appropriate action plan for Thailand • Defined plan to conduct similar assessments in other markets / brands 	2021
	Enfa	14	Increase collaboration with PNMA to improve adherence to existing legislation and raise standards of	Develop engagement programmes with key stakeholders and influencers and agree best practice and standards.	Regulatory	<ul style="list-style-type: none"> • Complete mapping and prioritisation of key stakeholders across RB's value 	2021



		good marketing practices across the industry.	Share best practice and insights on RB's BMS Marketing policy and Thai Milk Code to a wider group (infographics, Do's and Don'ts, etc.)		<ul style="list-style-type: none"> chain that we need to communicate with Once a year refresh communication on BMS Marketing Guidance among priority stakeholders through the PNMA 	2021 onwards
	15	Raise and extend awareness of RB's BMS Marketing policy and the Thai Milk Code using social media platforms.	<p>Evaluate the potential for national social media campaign(s) and communication programmes, separately and in conjunction with PNMA, on the benefits of breastfeeding, importance of maternal, infant and child nutrition.</p> <p>Communicate RB's role as a responsible BMS manufacturer.</p>	Marketing & Regulatory	<ul style="list-style-type: none"> Complete annual social media campaigns measuring reach and awareness Together with PNMA, communicate best practice, contribution and learnings to key stakeholders 	2021-2023 2023
	16	Support independent assessment of a broad range of retailers to identify non-compliance to national legislation and RB's BMS Marketing policy.	<p>Map RB's retailer footprint to identify high-risk retailers – adherence to RB policy and contribution to RB's net revenue.</p> <p>For larger retailers with whom RB has leverage, develop a compliance checklist, to be implemented when monitoring (e-commerce and traditional) retailers.</p> <p>Initiate regular and ongoing monitoring programmes, incorporating both traditional and on-line retailers, independently and in collaboration with PNMA.</p> <p>Include external verification of retailers as part of overall compliance programme.</p>	Regulatory, Sales & Global Corporate Affairs.	<ul style="list-style-type: none"> 100 % of direct active account / authorised distributors monitored against compliance checklist within 3 years External verification of RB's marketing practices vs Thai Milk Code and RB's BMS Policy 	2021-2023 2022
	17	Support and train retailers and re-sellers on responsible BMS marketing practices.	<p>Strengthen retailer awareness of BMS marketing.</p> <p>In conjunction with PNMA, develop (refresher) training programmes for retailers, re-sellers and those responsible for e-commerce platforms.</p> <p>Develop specific (for both traditional and e-commerce) retailers 'Do's & Don'ts' covering common areas of retailer non-compliance (i.e., price promotion, discounting, shelving displays, etc.).</p>	Marketing, Sales, Compliance, Regulatory & Corporate Affairs ASEAN	<ul style="list-style-type: none"> 100% contracted retailers attended refresher training within 3 years Deploy 'Do's and Don'ts' to traditional and e-commerce retailers 	2021 -2023 2022
	18	Encourage suppliers, business partners and key industry players to contribute to social impact initiatives that improve maternal and infant nutrition practices.	Ensure wellness suites are in place across all RB's Thai facilities, including offices and factories. Raise awareness with RB teams and visitors briefed on their availability and use.	Human Resources, Regulatory, Sales, Procurement, Corporate Affairs	<ul style="list-style-type: none"> Wellness suites are already in place across all RB offices and factories. Develop awareness via internal notice boards and include on visitor briefing instructions. 	Immediate 2021



			<p>Consider including the provision of wellness suites (or equivalent) and parental leave policy beyond existing Thai legislation in key supplier and business partner agreements.</p> <p>Communicate and leverage RB and UNFPA's Safe Birth Even Here campaign activities in Thailand.</p>	ASEAN & External Affairs	<ul style="list-style-type: none"> At least 5 suppliers and business partners engaged per year to increase awareness of maternal and infant nutrition practices (including wellness suites, and parental leave provisions beyond local legislation). Background and status of the campaign is communicated to key stakeholders. 	<p>2021 onwards</p> <p>Immediate</p>
19 & 20	Revision of RB's BMS Marketing policy, with a particular focus on the proposed extension to restrict marketing practices for BMS up to 36 months. Followed by an independent assessment of compliance with the policy.	<p>RB is fully committed to the WHO Global Nutrition Target 2025 and subsequent UN's SDG #2 – Zero Hunger. We are committed to improving optimal nutrition for mothers, infants and children and welcome any opportunities to advance progress in this area.</p> <p>RB has evaluated the possibility of extending its BMS Marketing Policy to restrict marketing practices for BMS up to 36 months of age. However, there is little correlation or evidence to support that imposing such restrictions would have the desired effect of improving breastfeeding rates and/or nutritional outcomes. In addition, it is imperative that there is commonality of definition of 'a breast-milk substitute' and that national legislation in Thailand is applicable to all companies (both local and international) that market products that are 'suitable for consumption from birth to 36 months' of age (including local foods and beverages). We also have a key role to play in disseminating scientific information to Healthcare Professionals (HCPs) in order to progress improvements in maternal, infant and child nutrition practices.</p> <p>We will continue to uphold our current global BMS Marketing policy and approach and follow national legislation, whichever is the strictest.</p> <p>Evaluate the potential for national social media campaign(s) and communication programmes, separately and in conjunction with PNMA, on the benefits of breastfeeding, importance of maternal, infant and child nutrition choices.</p> <p>Communicate RB's role as a responsible BMS manufacturer.</p>	Regulatory, Marketing, Compliance & ASEAN External Affairs	<ul style="list-style-type: none"> RB to continue membership and constructive dialogue in the Thai BMS trade association (PNMA) Complete annual social media campaigns measuring reach and awareness Together with PNMA, communicate best practice, contribution and learning to key stakeholders 	2021 onwards	



		21	Review internal compliance processes and capacity to monitor RB's adherence to RB's BMS Marketing policy with a particular focus on incentive structures for marketing staff.	Extend compliance monitoring to internal processes and incentive structures.	Marketing, Regulatory, Compliance RB Thailand, ASEAN External Affairs & Global Corporate Affairs	<ul style="list-style-type: none"> Regular programmes to monitor internal marketing processes established Plan to have independent external audits in place 	2021 2022
		22	Extend cooperation to local Civil Society Organisations "CSOs" and Academia to improve nutritional outcomes.	In partnership with the PNMA, we are committed to improving child nutrition as part of our contribution to the UN's SDG #2 - Zero Hunger. Consequently, we shall partner with a renowned university to analyse national consumption data and identify nutritional needs and gaps for children, to ensure a scientifically valid view on the role of child nutrition supplements. We shall subsequently implement initiatives to make a measurable difference in improving nutritional standards for children in Thailand.	Regulatory & ASEAN External Affairs	<ul style="list-style-type: none"> Publish results of research in peer reviewed literature Implement and report on initiatives that improve nutritional standards for children in Thailand 	2021 2021 onwards
		23	<p><i>Based on current BMS Marketing Policy, RB Thailand is recommended to:</i></p> <ol style="list-style-type: none"> Increase accountability, report publicly on an annual basis on all interaction with healthcare professionals (HCP) through seminars, conferences, etc. Cease any direct outreach through phone calls to (future) mothers that visit private clinics. Make clearer distinctions between the packaging of different Enfa Stage 1 and 2 products versus Stage 3 and 4 products. 	<ol style="list-style-type: none"> Since 2017, RB Thailand has submitted to the Committee for Marketing Control of Food for Infant and Young Children, annual reports on HCP interaction, including conferences and donations as stipulated by Thai Law. Ensure written consent forms in place, prior to any direct outreach calls to (future) mothers. New packaging clearly distinguishing Stage 1 & 2 from Stage 3 & 4. The new packaging is fully in line with the guidelines released by Thai Department of Health in 2019. 	Regulatory, Sales & Marketing	<ul style="list-style-type: none"> Continue annual reporting on sponsorship and product donation to the Committee for Marketing Control of Food for Infant and Young Children Implement monitoring system to ensure consent forms in place for all outreach calls Stage 1&2 with label clearly different from that of Stage 3&4 have been available since Q2 2020 	On-going 2021 Complete
		24	Once a revised BMS policy has been adopted, which is aligned with the WHO Code and WHA resolutions, various actions are recommended for RB Thailand, including the following: <ol style="list-style-type: none"> Assess what promotion materials for Enfa products for children up to age 3 (36 months) are distributed at 	RB continuously evaluates how it can deliver against the WHO Global Nutrition Target 2025 and subsequent UN SDGs. As a result, we will uphold our current global BMS Marketing policy and approach and follow national legislation, whichever is the strictest.	Corporate Affairs, Regulatory, Marketing & Compliance	<ul style="list-style-type: none"> Conduct regular internal monitoring, internal audit and external verifications to ensure marketing executions comply with RB's BMS Policy and Thai Milk Code 	2021 onwards



			<p>health care centres and hospitals and what outreach tools exist, including in private clinics and adjust these in accordance with the WHO Code and Resolutions when these materials include the brand name or brand logos.</p> <ol style="list-style-type: none">2. Only use social media channels to respond to questions from pregnant women and cease using these channels for active marketing of Enfa IFCN products up to 3 years of age, which is not in compliance with the WHO Code and the subsequent WHA resolutions.3. Re-assess labels of all Enfa products aimed at infants and children till the age of 3 years to ensure that no or other developmental claims are made on the packaging and labels of these products that could be interpreted by consumers as idealising infant formula. Have external, independent stakeholders from the medical/paediatric field provide input to the labels and current text.				
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6. Thailand HRIA - Commitment to accountability and transparency

As part of the corporate responsibility to respect human rights outlined by the UN Guiding Principles on Business and Human Rights, RB is committed to being transparent on our value chain human rights impacts and actions being taken to address them. This enables impacted right-holders, communities and wider civil society to have visibility of the impacts and actions we are taking; providing an opportunity for them to engage with us to support where necessary.

Given a number of the issues identified by this HRIA are systemic in nature and not unique to RB, transparency can increase awareness of these issues with a view to enabling long-term sustained change to address them, supported by collaboration with other stakeholders.

This action plan outlines our initial areas of focus. We will routinely report on progress and welcome any feedback on our approach or collaboration to support our work.

For further information on the HRIA, our action plan and related issues, please contact:

David Pettet
Global Human Rights & Sustainable Supply Chain Director
david.pettet@rb.com

David Croft
Global Sustainability, Environment & Human Rights Director
david.croft@rb.com