Nutrition & Health
Global Policy

OBJECTIVE

Incorporate the latest in nutrition science into our products and continuously improve their nutritional quality.

DEFINITIONS

Added Sugars:
They refer to all monosaccharides and disaccharides added by the manufacturer during food processing[1] (such as sucrose and dextrose), foods packaged as sweeteners (such as table sugar), sugars from syrups and honey, and sugars from concentrated fruit or vegetable juices[2].

Geographical Indication:
They are regulatory systems that protect the names and formulations of products that originate from specific regions and have specific qualities or enjoy a reputation connected to the territory of their production[3].

Indulgent Products:
For Sigma®, they are those products that combine pleasurable textures, beautiful visuals, tantalizing scents, appealing shapes, and delectable flavors leave a long-lasting, delicious impression that makes the consumer wish to indulge again.

Legal Name:
Also known as Standard of Identity (SOI). It is the regulatory definition provided for in the laws and administrative provisions applicable in each Business Unit, based on the common name that describes the nature, properties and ingredients that characterize the product [4,5].

Total Sodium:
Sum of all sources of sodium in a product. It includes sodium from raw materials, flavorings, preservatives, among others.

Trans-fatty Acids:
Unsaturated fatty acids that have at least one double bond in their *trans*[6] configuration. These in a diet are derived from those naturally present in food and those included by industrialization processes[7]. Trans fats naturally present in milk and meat are excluded from our nutritional limits.

POLICY

This Policy defines the main areas of work to continuously improve the nutritional profiles of our products, educate our consumers on the importance of having a healthy diet[8] and provide them with information on how they can integrate our products into their daily lives.

This policy must be implemented through the joint work of the Nutrition and Health Unit (N&H), Central Product Development Team (PDT), and our Business Units (BUs). All work included in this policy is guided by our Global Code of Conduct[9] and the Global Policy on Environmental, Social and Governance (ESG) Factors[10].

This Policy incorporates in its strategies our goals on Sustainable Innovation and Nutritional Information that are part of our *Sustainability Goals 2025*[11].

Key areas:

- Global Nutrition Standards (GNS):
  - To promote continuous nutritional improvement, Sigma® established its Global Nutrition Standards (GNS), by product category, for nutrients of public health concern due to risk of overconsumption.
  - They are based on recommendations on diet and its nutrients from international organizations such as the World Health Organization (WHO), the Food and Agriculture Organization of the United Nations (FAO) and the Codex Alimentarius, as well as diet guidelines published by the United States Institute of Medicine (IOM), the European Food Safety Authority (EFSA), the American Heart Association (AHA), among other internationally recognized organizations. In addition to technical feasibility and consumer acceptance.
  - The GNS will be reviewed periodically in accordance with scientific and technological advances, as well as the evolution of the product portfolio.

- GNS do not apply to indulgent products related to local flavors, pleasurable or exotic experiences for the consumer; nor to products that have a Legal name (Standard of Identity) and /or Geographical Indication in which the content of sodium, fat and / or sugars are a regulatory requirement.
- The N&H unit is responsible for the development, updating and training of GNS for the Central areas and BUs.
- The Central Innovation area is responsible for promoting GNS in its projects, as well as with the innovation community.
- The BUs and the PDTs are responsible for the implementation of GNS in their research and development projects, in their current portfolios, as well as their innovation projects.
- GNS are to be implemented by each BU in parallel of local regulatory compliance.

- Nutritional Guide to Product Design:
  - A central process that incorporates technological tools, global databases, and translates nutrition science into concepts that add value during the product design process and innovations.
  - The N&H Unit defines, trains, and manages the technological tools that allow an objective analysis of nutrients and products. It incorporates market trends, compares profiles with reference products, identifies areas of opportunity related to health and nutrition to establish recommendations, which contribute to decision making in the design of new products.
  - To standardize the use of the tools defined by the N&H Unit, the central and local PDT are responsible for their implementation and proper use.
  - The Information Technology Unit is responsible for ensuring the security and continuity of the systems for the tools, as well as their connectivity between the Business Units.

- Nutrition Research Programs:
  - Based on our product portfolio and our research and development projects, scientific research programs are defined and established with third parties, to accelerate the incorporation of new nutrition advances.
  - The way in which we work with third parties on nutrition and health issues is detailed in our *External Scientific Collaboration Guidelines on Nutrition and Health*, defined in Annex 1.
  - The N&H Unit defines the priority of nutritional research topics considering the information provided by the PDs and the Central Innovation area.
  - The research projects are internally led by the N&H Unit.

- Nutrition Education Programs:
  - We make communication plans to educate our internal and external audiences about nutrition and health issues, offering our consumers the value of healthy diets, as well providing ways to make healthier food choices.
  - We focus on educating:
    - The importance of having healthy diets to promote well-being[8].
    - The proportions of macronutrients in our diets, as well as the function of protein.
    - On the potential consequences of not having healthy diets or consuming excess nutrients that are of concern to public health (sodium, added sugars, saturated fats, *trans*-fats)[12].
    - About the nutritional information on the labeling of our products, as well as their relevance.
    - About the ways to integrate our products into their diets.
  - The N&H Unit is responsible for the development of the internal nutritional communication strategy, definition of topics, content development and its execution.
  - The areas of Marketing, Regulatory Affairs and Internal Communication of each Business Unit support the development and execution of the communication program.
  - BUs are responsible for the local implementation of the Nutrition Education Program with their consumer and employee touchpoints within the Business Unit.

ANNEX 1. External Nutrition & Health Scientific Collaboration Guideline

Scientific research, in the field of nutrition, involves a comprehensive effort of researchers, research centers and the food industry. These collaborations must be based on internationally recognized ethical and scientific principles, with the purpose of creating a collaborative environment and maximizing the interdisciplinary experience between the parties involved (research centers, researchers and Sigma®), while contributing to the resolution of complex research problems that, in isolation, would be even more complicated to solve[13,14].

At Sigma® we advance the science of nutrition through scientific research based on the ethical principles defined below. This way of conducting research strengthens the trust of our consumers, employees, suppliers, customers, authorities and investors. Scientific collaborations are aligned with our Global Code of Conduct[9].

These External Collaboration guidelines address aspects of scientific collaborations in nutrition, such as the determination of clearly understandable and agreed objectives, the objectivity and transparency of research, the monitoring of research progress/success, scientific metrics, accountability and the dissemination of research results.

Principles:

1. The researchers and research institutes with whom we collaborate are aware of and accept our Global Code of Conduct[9].
2. We fund research based on hypotheses and analysis of clearly established objectives. Sponsored researchers must work in alignment with accepted principles of scientific rigor to test established hypotheses and ensure the accuracy of the resulting data.
3. Research funding is required to use internationally recognized research methods.
4. Sponsored researchers accept and are directed by the applicable rules for the protection of research subjects.
5. We do not offer or accept results-oriented remuneration for a research project.
6. We include clinical investigations in our public record or applicable databases.
7. We ensure that all clinical and preclinical studies are approved by an Ethics Committee.
8. We document, prior to initiating any research, that sponsored researchers are free to attempt to present and publish the results in peer-reviewed and indexed journals, regardless of the results as long as it is within an appropriate time frame and Sigma®'s intellectual property is not compromised.
9. We require confidentiality agreements signed in manuscripts, publications, conference presentations and press releases, considering the financial interests and sponsorships received from Sigma®.
10. When Sigma® employees are authors or co-authors of manuscripts and/or public proposals, we submit them to Sigma®'s review process for validation/submission of scientific publications prior to publication.

11. We declare paid authorship agreements on publications, presentations, press releases or any other venue, which are related to sponsorships made by Sigma® employees as authors or co-authors.
12. Every researcher, when working with contract research centers (CROs) or those acting as contract researchers, must clearly declare their affiliation. We request such researchers to publish only under the auspices of the academic institution and/or CROs with full disclosure of Sigma® funds where applicable.
13. Where applicable, these principles should be included in researchers' contracts with CROs, ensuring that contractual conditions oblige them to comply with them.
14. We publish on our portal citations and links to Sigma®-funded research at the time of publication in a peer-validated journal.
15. We ensure the transparency of the results of sponsored research, by indicating our role in the design, implementation, and analysis of research, as well as in its funding.

References:

1. Diet WHO Study Group on Diet, Nutrition and Prevention of Noncommunicable Diseases & World Health Organization. (1990). Diet, nutrition and the prevention of chronic diseases: report of a WHO study group [meeting held in Geneva from 6-13 March 1989]. World Health Organization. https://apps.who.int/iris/handle/10665/39426

2. FDA. Code of Federal Regulations, Title 21 Food and Drugs, Sec. 101.9 Nutrition Labeling of Food (21 CFR 101.9(c)(6)(iii)). https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-101#p-101.9(c)(6)(iii)

3. EU, Quality schemes explained. https://ec.europa.eu/info/food-farming-fisheries/food-safety-and-quality/certification/quality-labels/quality-schemes-explained_en

4. FDA. Code of Federal Regulations, Title 21 Food and Drugs, Sec. 102.5 Nutrition Labeling of Food (21 CFR 102.5(a)). https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-102#p-102.5(a)

5. EU REGULATION (EU) No 1169/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2011 Chapter 1, Article 2, 2(n). https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011R1169&qid=1659713081530&from=ES

6. REPLACE *trans*-fat: an action package to eliminate industrially produced *trans*-fatty acids. World Health Organization 2021. ISBN 978-92-4-002110-5. https://www.who.int/publications/i/item/9789240021105

7. Scientific and technical assistance on *trans* fatty acid. EFSA Supporting publication 2018: EN-1433. https://www.efsa.europa.eu/en/supporting/pub/en-1433

8. Healthy Diet, World Health Organization https://www.who.int/news-room/fact-sheets/detail/healthy-diet.

9. Sigma® Global Code of Conduct https://sustainability.sigma-alimentos.com/wp-content/uploads/2021/07/Code-of-Conduct-EN-External.pdf.

10. Sigma® Environmental, Social and Governance Policy. https://sustainability.sigma-alimentos.com/wp-content/uploads/2021/07/ID-GP-Environmental-Social-and-Governance-002-Jun21.pdf.

11. Sigma® 2025 Sustainability Goals. https://sustainability.sigma-alimentos.com/our-goals/.

12. A Regan L Bailey, Jamy D Ard, Teresa A Davis, *et al.* A Proposed Framework for Identifying Nutrients and Food Components of Public Health Relevance in the Dietary Guidelines for Americans, The Journal of Nutrition, Volume 151, Issue 5, May 2021, Pages 1197–1204, https://doi.org/10.1093/jn/nxaa459.

13. Rowe S, Alexander N, Kretser A, Steele R, Kretsch M, Applebaum R, Clydesdale F, Cummins D, Hentges E, Navia J, Jarvis A, Falci K. Principles for building public-private partnerships to benefit food safety, nutrition, and health research. Nutr Rev. 2013 Oct;71(10):682-91. doi: 10.1111/nure.12072. PMID: 24117791; PMCID: PMC3886300. https://pubmed.ncbi.nlm.nih.gov/24117791/.

14. Poli A, Marangoni F, Agostoni CV, Brancati F, Capurso L, Colombo ML, Ghiselli A, La Vecchia C, Molinari E, Morelli L, Porrini M, Visioli F, Riccardi G. Research interactions between academia and food companies: how to improve transparency and credibility of an inevitable liaison. Eur J Nutr. 2018 Apr;57(3):1269-1273. doi: 10.1007/s00394-018-1633-1. PMID: 29435663. https://pubmed.ncbi.nlm.nih.gov/29435663/.