



ENGAGEMENT POLICY

(version 3.0)

June 2025

1. Purpose, Scope and Definitions

This policy governs the Micronutrient Forum's ("MNF") engagement with external partners (i.e., donors, sponsors, contributors, and all other stakeholders) and is designed to support the advancement of our mission while minimizing the risks of perceived or real conflicts of interest.

This policy provides an unambiguous, evidence-based, transparent, and implementable tool for managing perceived and real risks of conflicts of interest with partners. Transparency and ethical conduct are required in all our engagements, but given MNF's work, special attention is required for our engagement with the for-profit private sector, notably the food and beverage industry. As such, this document presents our Engagement Policy, details our due diligence and engagement processes, and states the roles and responsibilities needed to apply this policy.

This policy defines engagement as partnering with, receiving funding from, or in-kind sponsorship from an individual or organization, including: any contractual program or policy collaboration, membership in our program or steering committees, joint communication activities, governance, research collaboration, and participation of representatives of the partner in panels and advisory groups organized by MNF.

2. Engagement Guidelines

MNF will not engage with any:

1. Entity currently on any credible banned or sanctioned entities/persons lists;
2. Entity that manufactures, markets, or distributes armaments or tobacco;
3. Entity engaged in unethical practices, including being convicted of bribery or other forms of corruption, involved in human rights violations, human trafficking, or child labor;
4. Entity that violates the [World Health Organization International Code of Marketing of Breast-milk Substitutes](#) ('The Code', referring to the 1981 WHO Code and all subsequent and relevant WHA resolutions);
5. Company in the food and beverage sector that generates less than 50% of its sales from healthy products defined as a Health Star Rating of 3.5 or above, according to the ranking defined by the current Global Access to Nutrition Index and Global Retail Assessment published by ATNi;
6. Company in the food and beverage sector that is not included in the ATNi rankings and whose core business is to produce or market alcohol or ultra-processed, energy-dense, and nutrient-poor foods and drinks;¹ or

¹ **Ultra-processed foods.** UPF formulations made mostly from low-cost ultra-processed raw materials, including modified starches, hydrogenated fats, added sugars and salts, soy protein, and mechanically separated meat. They are of industrial origin and are typically energy-dense, high in salt, sugars, trans-fats, and food additives and preservatives. They are hyper-palatable, have a long shelf-life, are designed and manufactured for maximum profit, and are highly branded and marketed to consumers, including children, adolescents and caregivers.

UPF comprise, among others, fast-foods, junk-foods, sweet and salty snacks, hot dogs, packaged cookies, cakes, ready-made frozen meals, breakfast cereals, many meat products, soft drinks and sugar-sweetened beverages. A large body of research has demonstrated strong associations between the intake of UPF and elevated nutrition and health risks, including increased risk of overweight, obesity, type-2 diabetes, cardiovascular diseases, cancer, poor mental health and all-cause mortality. Further, UPF are less environmentally sustainable than nutritious, minimally-processed foods. (Reference:

7. Company in the food and beverage sector that violates the WHO guidelines to protect children from the harmful impact of food marketing.²

In addition, MNF will not partner with foundations and other organizations that represent the interests of an entity captured in the engagement guidelines, including foundations, trade groups, and multi-stakeholder platforms.

MNF will not invite representatives of these entities as participants, speakers, or panelists at meetings organized by MNF, except when the purpose of the meeting is to have a dialogue with these partners on compliance and accountability. Representatives of these entities will not be allowed to be speakers, presenters, or panelists at the MNF Global Conference.

However, we welcome representatives of these companies as delegates to the MNF Global Conference. MNF considers its Global Conference and the sharing of knowledge and evidence as a global public good, to which anyone, including representatives of these entities, is allowed to register and participate. The MNF Global Conference offers a platform to discuss the evidence, including policy-relevant evidence, but it is not a place where policy decisions are being made.

3. General Policy Statement

As a convener and platform, MNF recognizes the importance of encouraging and facilitating constructive dialogue between representatives from all sectors to achieve our collective goals and reduce micronutrient malnutrition. To ensure we can accomplish this without any real or perceived conflict of interest, our Engagement Policy aims to promote and support our mission in an evidence-based and transparent manner, free of undue influence, benefiting health and nutrition, and avoiding any real or perceived conflicts of interest.

4. Due Diligence Process

We conduct due diligence on potential partners before entering into agreements or other arrangements.

5. Approval, Display, Review and Revisions

This policy shall be publicly available through MNF's website and subject to periodic review and revision as deemed appropriate by the Board of Directors.

Approved by the MNF's Board of Directors on 18 June 2025

<https://www.unicef.org/media/142056/file/Programme%20Guidance%20on%20Engagement%20with%20the%20Food%20and%20Beverage%20Industry.pdf>.

² Policies to protect children from the harmful impact of food marketing: WHO guideline <https://www.who.int/publications/i/item/9789240075412>. Adherence to this guideline will be assessed by evaluating the following three criteria: (a) restrictions to marketing products to persons under 18 years of age to only products that meet a definition of healthy according to a WHO Regional model or other government-endorsed nutrient profiling model; (b) Applies the policy to all media channels and techniques and all markets; and (c) Commissions independent third-party auditors to audit compliance with the policy. (ATNi Responsible Marketing Index: https://accessstonutrition.org/app/uploads/2024/11/ATNi_GI_category_marketing_20250603.pdf

Section 1: Roles and Responsibilities

Management is responsible for the conduct, oversight of the due diligence, and documentation of the approval of engagement. This process will consist of the following steps:

- MNF management will use [UNICEF's official partner list](#) as a first screening tool.
- Partners that are not on the UNICEF list will be evaluated according to the process spelled out in the accompanying *Appendix 1. MNF Due Diligence and External Engagements Procedures*.
- In case of doubt, MNF management will ask the Executive Committee under MNF's Board of Directors to review cases escalated from the due diligence workflow.
- In such cases, the Executive Committee will conduct further due diligence and shall recommend to management whether to engage the potential partner.
- MNF management shall have the final authority on whether to approve the engagement.
- Any director with a potential conflict of interest must recuse themselves from participating in the decision making.

The President or their designee shall have responsibility for the negotiation, approval, and execution of all agreements formalizing partnerships. All written agreements and the associated due diligence package must be preserved for the term of the agreement and for 36 months thereafter.

Section 2: Due Diligence Process

1. Determine whether the potential partner has been approved as an official UNICEF partner as per [UNICEF's official partner list](#).
2. For potential partners that are not on the UNICEF official partner list, MNF will vet them through the following steps:

Step 1: Review the potential partner's ownership structure and revenue sources, and determine whether the potential partner is owned, controlled, or supported by any entity falling into an Unacceptable Risk category.

Step 2: If Step 1 does not uncover any issues, then Management is clear for further engagement processing. If Step 1 results in potential issues, Management may either not engage with the organization or escalate the issue to the Executive Committee for review. In such cases, the Executive Committee in collaboration with Management will conduct further due diligence and shall recommend to Management whether to engage the potential partner.

3. Document due diligence vetting performed for potential partners not on the UNICEF approved partner list.

To standardize the vetting, MNF will use a Partner Due Diligence Form.

The Partner Due Diligence Form shall be preserved for the term of the resulting agreement(s), if any, and for three years thereafter.

Potential Partner's Legal Name:				
Project Name:				
Due Diligence Team Members:				
Date Initiated:				
Action Checklist	Questions	Y	N	Next Step(s)
Determine whether potential partner has been included in the UNICEF's official partner list	Has the potential partner been accepted by UNICEF as an official partner?			If "Yes", accept partner and preserve due diligence documentation.
<input type="checkbox"/> Obtain and review reputable due diligence report on potential partner or perform manual check. <input type="checkbox"/> Review public information regarding potential partner's involvement with Breast Milk Substitutes	Does the potential partner fall into any of the exclusion categories as described under §2 of MNF's Engagement Policy?			If "Yes", stop processing, preserve due diligence documentation and report to President. If "No", continue to next Action. If unclear, escalate to Executive Committee.
<input type="checkbox"/> Review potential partner's description and/or documentation regarding ownership structure and revenue sources. <input type="checkbox"/> Check for any ultimate parent entity or majority owner, and obtain and review reputable due diligence report on them. <input type="checkbox"/> If available, review public records showing potential partner's ownership structure and revenue sources.	Is the potential partner a foundation or another organization that represent the interests of an entity falling into category clause 2 of MNF's Engagement Policy, including foundations, trade groups, and multi-stakeholder platforms?			If "Yes", stop processing, preserve due diligence documentation, and report to President. If "No", accept partner and preserve due diligence documentation. If unclear, escalate to Executive Committee.
<input type="checkbox"/> Obtain board-level decision regarding potential partner if escalated to Executive Committee.	If necessary, was the potential partner cleared by board-level decision?			If "No", stop processing and report to President. If "Yes", accept partner and preserve due diligence

				documentation.
<input type="checkbox"/> Preserve due diligence documentation	N/A	-	-	N/A

2. RESOURCES FOR DUE DILIGENCE

The vetting process for all engagements should be conducted as thoroughly as possible. Due diligence may rely on generally reputable due diligence reports such as those provided by TRACE International or Dow Jones.

TRACE website: <https://www.traceinternational.org>

Dow Jones Due Diligence website: <https://professional.dowjones.com/risk/dow-jones-due-diligence>

Also, due diligence team members may use desk research, including review of press and media, websites, annual reports, inquiries to other MNF stakeholders, etc. While not a comprehensive list, below are some additional resources to support the vetting process.

- **Resources on violating the International Code of Marketing of Breast-milk Substitutes and Follow-on Milk:**

- [Access to Nutrition Index](#)
- [Network for Global Monitoring and Support for Implementation of the International Code of Marketing of Breast-milk Substitutes and Subsequent relevant World Health Assembly Resolutions \(NetCode\)](#)
- [International Baby Food Action Network](#) has taken an active role in monitoring company and country compliance with the International Code of Marketing of Breast Milk Substitutes.

- **Corporate Social Responsibility sites:**

- [RepRisk Company Report](#)
- Calvert's [Principles for Responsible Investment](#) and [Ratings](#)
- Business in the Community's [Responsible Business Tracker](#)
- [FTSE4Good Index Series](#)
- United Nations Global Compact <https://www.unglobalcompact.org/>

- **Independent Watchdog and Press Sites:** The following sites are most useful for investigating negative press about a company. They may also have information, such as whether the company is listed on sustainability indices (generally a good sign) and include links to both positive and negative information from the company itself, as well as criticism from watchdogs and the press.

- [Oxfam's Behind the Brands](#)
 - [Business & Human Rights Resource Center](#)
 - [CorpWatch](#)
 - [Corporate Critic](#)
 - [CSRwire](#)
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