



Best Practice Commitment Guide

Mum's best-loved source of advice & support for everyday parenting

2011

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1 Introduction

Bounty's values

For over 50 years Bounty has helped Mums get the most out of family life. Our unique partnerships with hospitals and HCPs, relationships we cherish, are testament to our dedication to providing the best advice and support to Mum. And we strive to make it easy and simple to access that wealth of expertise and experience - online, offline, locally, nationally – to support family life.

We are a commercial business, so have responsibilities to our shareholders, but never at the expense of other stakeholders. We believe we can deliver value to ALL by delivering the advice, support, services, partnerships, products and returns they expect from Bounty.

The Bounty Best Practice Commitment is a set of guidelines which underpin our values and ensure that Bounty and its clients work to the best practices set out by healthcare professionals, government departments and other professional organisations.

Bounty's responsibility is 4 fold:

- 1) To ensure that mums to be and new mums get accurate and good advice
- 2) To earn and maintain the trust and respect of Health Care Professionals involved in the care of mums to be and new mums
- 3) To accurately represent the standards and guidelines of all bodies that influence policy and practice within the Maternity and Paediatric sectors.
- 4) To help position our clients promotions ethically and responsibly.

1.1 Bounty's Best Practice Policy:

- Sample packs
- Parenting guides
- Database activities
- Website activities
- Bounty Health Network
- Insight

Bounty provides valuable information, designed to support the advice given to expectant and new mums by healthcare professionals.

Bounty retains a Best Practice Panel of highly reputable professional advisers to ensure the accuracy of health and parenting information.

With comprehensive coverage – 95% of all expectant mums and 98% of all new mums – Bounty guides and sample packs are socially inclusive and geared to a wholly universal audience, irrespective of income, race or social status. Therefore clients must reflect this in any advertisements or literature they present.



1.2 Maternity Services – Control of Pack Contents

Most hospitals appreciate the choice and quality offered by Bounty packs. However, some individual maternity units have specific policies that Bounty must accommodate. Therefore hospitals are able to consult with our contracts team over the contents of the packs distributed in hospitals. Consequently, Bounty will refuse samples or literature that fail to reflect local policy.

2 Audit Procedure

2.1 Bounty Approval Panel

Anything sent out under the Bounty name is assessed by an internal Bounty Audit panel. Everything must adhere to all Best Practice standards and no item will be released until written Audit approval is granted.

2.2 Re-auditing Procedure

Best practice is organic and subject to change if new information or research comes to light. Therefore clients must accept that all inclusions are subject to review by the Bounty Audit panel, whenever an item is reissued, or if in a continuous run, after six months. Clients are advised not to print or pre-pack larger quantities than necessary for a six-month period to ensure materials are compliance with any revisions.

2.3 General Claims and Data

It remains the responsibility of the Client to ensure that any claims and data cited for products are fair and accurate. Bounty may request to see supporting clinical evidence to confirm the efficacy and safety of a product. In addition, Bounty reserves the right to refuse any product likely to be considered contentious by healthcare professionals and/or parents or which might undermine our vision of being Mum's best-loved source of advice & support for everyday parenting

2.4 Advertising Standards Authority

Bounty requires Clients to operate within the guidance of the Advertising Standards Authority (ASA), and will refuse any advertising which may fall foul of regulations.

Product claims which explicitly or implicitly suggest superiority, such as 'The No1', 'The best', 'Preferred by', 'Parents favourite', must have data to support them. Similarly, advertising which claims that a product is endorsed by a healthcare professional or group of professionals, must have data to support this.



3 Operating Standards

3.1 Quality Control & Packaging

Bounty is obliged to ensure that any products contained in packs are packaged sufficiently and are stability tested. Packaging will be checked by our in-house logistics team prior to approval for the item to be packed.

3.2 Warehousing & Date stamping

Clients must supply samples and literature in quantities and to a schedule complying with Bounty's own pre-determined warehousing procedures. Food samples must have shelf-life and date-stamping that meets the shelf-life parameters. If Client literature or advertising indicates special offers, any close date should allow mothers sufficient time to participate and be in line with distribution requirements for retail partners. Bounty reserves the right to halt packing of samples or literature that does not meet these criteria.

3.3 Traceability

Packs distributed via hospitals are traceable by production batch and distributor and can be traced within a few hours of any notification. This important procedure safeguards clients as well as health professionals and mothers.

4 Infant Feeding

4.1 Bounty & Breastfeeding

Bounty fully supports the WHO/Unicef International Code on the Marketing of Breastmilk Substitutes and all subsequent resolutions both to the letter and the spirit and therefore recommends and supports exclusive breastfeeding for at least the first 6 months.

Bounty DOES:

- Recognise its privileged position in communicating everyday with new and expectant mums and the responsibility that comes with that
- Provides only factual information about breast and bottle feeding which is free from commercial interest
- Has its own internal audit panel who rigorously check and approve all communications (this includes checking the landing pages of website urls)
- Ensure that clients are contractually bound to not make any changes to communications distributed via Bounty media channels without re-submission and all campaign communications are automatically reviewed every six months



- Monitors and responds to any policy change at the earliest opportunity

Bounty DOES NOT:

- Generate revenue from the promotion of bottle feeding
- Allow advertising from any types of formula milk (including, infant, follow-on, toddler and specialist/prescription milks). It also excludes advertising for bottles, teats, dummies and weaning foods and drinks which state suitable from 4-6months, on the labelling of any products in its range
- Allow advertising of foods if the aim is to encourage parents to introduce solid food before six months
- Facilitate any recruitment to Baby Clubs or helplines specific to brands of excluded* products
- Allow advertisements for general retailer's baby clubs to include website urls which land on content which advertises excluded products
- Allow companies to sponsor its breast or bottle feeding information or resources
- Allow website urls on advertisements of acceptable products, which are marketed under the same brand name as those primarily associated with excluded products, to land on content which:
 - Promotes formula milk, bottles, teats, dummies
 - Recruits to a Baby Club or promotes a helpline specific to brands of formula milk, bottles, teats, dummies
 - Contains inaccurate or misleading information relating to infant feeding
 - Have any more prominence than other contact details
 - Give any call to action to visit the website
- Bounty does not allow advertisements from general retailers to promote infant feeding. In addition, retailers' website urls cannot land on content which specifically promotes infant feeding . N.B we accept that general retailer web space changes by the minute, therefore products associated with infant feeding may occasionally feature as a small part of the landing page content, but must never be the primary focus

*excluded products are defined as:

- any types of formula milk (including, infant, follow-on, toddler and specialist/prescription milks)
- bottles, teats, dummies
- weaning foods and drinks which state suitable from 4-6months



4.2 Bounty Weaning and complimentary Feeding policy

Bounty definition of weaning: Weaning is the process of transition between reducing the supply of milk and gradually introducing an infant to solid food.

Non-weaning food brands

There are some products which are not classed as weaning foods, (i.e. they are not exclusively marketed to promote the transition between milk and a solid diet), but are used by mums during weaning. Examples of this are some smooth yoghurt brands. Where the label states that the product may be given from 4 months, we will not allow any promotion in any media channels.

If the non-weaning food brand has an on-pack indication as "suitable from six months" we will allow promotion in our You and Your Growing Family guide, data to 6+ month babies, packs destined for mothers of 6+ month babies and respective 6+ month areas of our website.

4.3 Post-weaning children's foods

Companies that make post-weaning foods marketed towards young children and labelled as 12+ months such as raisins or toddler snacks are allowed to advertise in our You and Your Growing Family post-natal guide and the Family pack, relevant areas of our website, and use data for babies 6+ months provided that the brand has no other products in its range which state they are suitable from 4+ or 4-6 months.

4.4 Sugar in Infant Foods

Products and samples will only be accepted by Bounty provided they contain no added sugar in the recipe or, where sugar is added in order to achieve necessary palatability, this addition is restricted to a maximum of 6%. The product also has to adhere to the 6+ months criteria above.

4.5 Salt in Infant Foods

Bounty will refuse samples and advertising of any infant food that contains added salt /sodium. Some foods with very low levels of salt (or sodium) may be acceptable, should its natural presence be essential to the processing of the food products concerned.

4.6 Honey

Current advice is that honey should not be given to babies until they are one year old. This is because rarely honey can contain a type of bacteria that can cause infant botulism. Consequently, we will not take any promotional materials for honey, or allow any imagery of honey in other advertisements aimed at infants less than 1 year old.



5 Healthy eating in Pre-school children

As with infants and toddlers, Bounty is aware of the need for a healthy balanced diet for pre-school children. To this end, Bounty does not promote any products, including foods, directly to children.

5.1 Peanuts

Current advice is that where there is a known allergy in the family – parents should consult a HCP prior to giving peanuts or foods containing nuts to their child.

If a child hasn't been diagnosed with any allergies and there isn't a history of allergy in their immediate family, nuts or foods containing nuts can be given after they are six months old. As parents may not be aware of whether there is an allergy in their family, Bounty recommends that no nuts should be advertised to children before 3 years of age.

Additionally whole peanuts should not be given to any child under five because of the risk of choking. All promotional activities carried by Bounty should comply with this advice.

6 Non-Food Baby Products

6.1 Trainer Cups

As there are so many designs and brands of trainer cups, we request that manufacturers of all lidded trainer cups include the following statements on their advertisements:

'Never put juice or sweet drinks in no-spill/trainer cups. Reserve use of feeder/trainer cups for mealtimes and snack-time drinks only.'

6.2 Sterilizers

Bounty will accept promotional activities for sterilizers only in association with breast pumps. Promotional materials for sterilizers should therefore carry a reference to breast pumps, either in the text or through illustration. As sterilizers have a strong association with bottle-feeding Bounty ask that no teats or bottles are used in the creative or text.

6.3 Dummies/Soothers

Bounty is aware that both FSID (Foundation for the Study of Infant Deaths) and the Department of Health recognize that the regular use of dummies/soothers, once breastfeeding has been established, may offer a protective effect against cot death. The research to support this theory is still controversial and there are



concerns regarding an increase in the incidence of cot death on occasions when a parent omits to give a dummy to a baby who regularly uses one. UNICEF is concerned about the use of dummies interfering both with the establishment of breastfeeding, and ensuring the continuing supply of breast milk.

In light of this, Bounty will not accept any promotional activities for dummies/soothers for babies less than 6 months of age. Bounty will also not allow images of infants less than 6 months old using dummies to feature across all media channels.

6.4 Sleeping Positions, Duvets & Pillows

Bounty adheres to FSID (Foundation for the Study of Infant Deaths) advice in promotions showing sleeping babies.

Where relevant, babies should be shown sleeping on their back in a cot or crib made up in the feet-to-foot position. Pictures should not show a baby sleeping with an adult on a sofa or armchair. Babies should not be shown sleeping on their side or front. FSID also warn against the use of duvets, quilts and pillows, babies sleeping on fleeces, wearing hats and other outdoor clothing indoors, and the use of loose badly fitting sleep suits with high tog-ratings. Literature and advertising must give a clear indication that these products are only suitable for infants of 12 months and over.

6.5 Baby Monitors

Monitors should not be used as a replacement for conventional childcare routines and should not suggest that a monitor is an essential purchase. In addition, in line with FSID recommendations, we will not take promotional activity for Baby Monitors which suggest that they reduce the risk of Sudden Infant Death.

6.6 Baby Walkers

Some sit-in baby walkers can impair an infant's natural mobility development and may have a potential to injure. Consequently, Bounty refuses specific promotion for sit in baby walkers. This does not extend to walkers which are pushed along.

6.7 Pharmaceutical Products for Infants

Advertisements for such products should clearly state the age range for which it is suitable. It also needs to carry a statement that says 'Always read the label. Ask your Healthcare Professional or Pharmacist for advice.'

6.8 Toothpaste and Fluoride

The Department of Health, in association with The British Association for the study of Community Dentistry (BASCD) published a document in 2007 called 'Delivering Better Oral Health - an evidence-based toolkit for prevention'. This document recommends that for children age 0 – 3 years, toothpaste containing



no less than 1,000 ppm fluoride should be used. For older children, aged 3 – 6 years, toothpaste containing 1,350-1,500 should be used. Bounty will ensure that all promotional materials for toothpaste will comply with these fluoride requirements.

6.9 Safety and Choking Hazards

All advertising materials distributed by Bounty should be mindful of safe practices and potential hazards to babies and young children. In addition, any creative illustrations should show the use of appropriate safety equipment, such as stair gates, fireguards and cycle helmets.

With specific regard to choking, Bounty retain the right to refuse the advertisement or depiction of products such as toys or clothing which may have ribbons or other small items which pose a risk of choking or strangulation.

7 Adult-focused Products

7.1 Adult Foods

Bounty accepts food and non-alcoholic drink samples intended for pregnant women, adults and older children. Samples included in post-natal packs must be labelled clearly to indicate their appropriate use as well as the minimum recommended age at which children or infants should consume them.

Alcohol – Current advice is that Pregnant women and those wishing to conceive should abstain from alcohol. Breastfeeding mothers should limit their alcohol intake to an occasional glass.

7.2 Vitamins & Supplements

Any promotion for vitamins or supplements must indicate their appropriate use (i.e. dosage and duration), and the reason for the supplement. All such supplements must have supporting safety data, or be generally acknowledged as safe for the target group where no evidence exists. For some vitamin supplements we may require advertising materials to carry a warning that the supplement should 'only be taken on the advice of a Health Professional'. One such example would be the case of iron supplements in pregnancy.

7.3 Relaxation/Essential Oils

Bounty cannot accept promotion for any products aimed at pregnant women which contain lavender, ylang ylang or clary sage essential oils as these oils have been implicated in inducing labour. Bounty reserve the right to refuse products containing any other oils, which subsequent to the preparation of these guidelines, may be found to pose a risk to expectant women, new mothers or infants.

7.4 Slimming & Slimming Products

Bounty will refuse promotion for any slimming scheme or product with an intended audience of pregnant women. Bounty will only allow promotion of



these materials 6 months post-natally. All slimming products and services must have healthy eating and exercise as their primary focus.

7.5 Antenatal Scanning Services

Bounty adheres to the views of UKAS (United Kingdom Association of Sonographers).

The following criteria should be fulfilled by any company for which we would carry promotional material:

- The company should operate to the current internationally agreed safety standards i.e. issued by either the British Medical Ultrasound Society (BMUS) or the World Federation of Medicine in Ultrasound & Biology (WFUMB)
- Staff performing such scans should be appropriately qualified and experienced
- The company must have in place pathways for medical referral
- The company should also make provisions for indemnity and legal liability.

7.5.1 Alternative Medical Interventions

Any claims made for an alternative therapy (e.g. hypnosis, reflexology, massage etc.) must be supported by reputable clinical evidence. Claims that an intervention 'will' achieve a result must have sound supporting data, otherwise, claims must be restricted to 'may' or 'can' as appropriate. Comparative claims against traditional methods must also be supported by directly comparative research. Claims should not be unrealistic or exaggerated, e.g. pain-free birth, and the qualifications of anyone offering such services must be recognised by the appropriate association or supporting body.

7.6 Pharmaceutical Products for Adults

The MHRA (Medicines and Healthcare products Regulatory Authority) recommend that the following statement is placed on any medicine promoted to pregnant women, 'Medicines can affect the unborn baby. Always talk to your doctor or pharmacist before taking any medicine in pregnancy'. Bounty will advise that such wording is included in any promotional material for medicines, or similar wording as approved by the PAGB (Proprietary Association of Great Britain).

7.7 Stem Cell Collection

Whilst stem cell collection has been proven in certain circumstances to offer benefit, there are a number of difficulties in allowing private companies access to hospital environments. The RCM does not recommend commercial stem cell banking and In 2004, the European Group on Ethics in Science and New Technologies advised European Commission that: 'The legitimacy of commercial cord blood banks for autologous use should be questioned as they sell a service, which has presently, no real use regarding therapeutic options. Thus they



promise more than they can deliver. The activities of such banks raise serious ethical criticisms'.

Therefore Bounty will not undertake any advertising of private stem cell collections unless there is prior agreement from the hospitals specific to that location.

7.8 Nipple Shields/Protectors & Creams

Nipple shields can interfere with breastfeeding and are only recommended by healthcare professionals in special circumstances. Bounty does not allow advertising or promotions that depict or mention nipple shields or protectors as it could imply that nipples need protecting or that breastfeeding is painful, which is not acceptable under the WHO code.

Advertising or sampling of creams for nipples is permitted, but their promotion must not discourage women from initiating (or extending) breastfeeding. These creams should not contain anything which may cause irritation to either to nipples or the infant, or have to be removed in order to breastfeed. They must not be negative in any way towards breastfeeding or imply or state that breastfeeding is painful or that the use of creams prevents sore nipples or that nipples require any preparation in order to breastfeed.

7.9 Gambling/Gaming

Bounty will not work with companies who require a deposit to be lodged prior to the award of any "free credit" or "free prizes". We will also refuse activity which involves the use of a premium rate phone number to ascertain prize details. Furthermore Bounty will not accept gaming advertising which incentivises or is exploitative in nature.

8 Data and Electronic Media

8.1 Bounty Data Policy

Expectant and new mums provide their data in order to join the Bounty club and receive free samples and information. Approximately 95% are happy to give permission to allow Bounty to communicate with them again or to pass on their details to selected third parties in order to receive further information, offers, vouchers and free samples.

8.2 Data Protection Legislation and Regulation

Bounty's database is operated in strict compliance with the Data Protection Act. In addition Bounty strictly observes the rules and conditions of the Direct Marketing Association Code of Practice.

Bounty subscribes to the Mailing Preference Service (MPS). We will remove any person's name from its records at any time, should that person so request, either directly to Bounty or via the MPS. Bounty bolsters its own extensive



records of deceased infants, provided through our relationships with midwives and subscription to the MPS subset, the Baby Preference Service (BPS).

8.3 Using the Bounty Database

Companies wishing to promote their products directly to members of the Bounty Club may only do so if their goods and services comply with the Bounty best practice criteria, including BFI guidelines. We will not provide details to any companies wishing to market breast milk substitutes or any feeding equipment which could undermine breastfeeding.

Materials to be distributed via the rental of this data are reviewed by the Bounty Audit panel to ensure the activity complies with all Best Practice Guidelines. If amendments are required these will be implemented and audited prior to any data release. Please see separate policy "*Data Security and due Diligence*" regarding the systems in place for use of Data.

8.4 Telephone Data Sales

The rental of Bounty data to make telephone approaches is also subject to the Bounty best practice criteria, and consequently, scripts will be reviewed by the audit panel for compliance. Data will not be sold ante-natally and calls may only be made between 9am and 7pm. Please also refer to the "*Outbound Policy*" for further restrictions.

8.5 Electronic Media

Online adverts are subject to the same restrictions as other media channels. All web links are checked to ensure that the landing page is acceptable in content. Retailer pages such as supermarkets that are accessed away from Bounty.com are the responsibility of the retailer and as content is dynamically rotated, cannot be monitored by Bounty.



Pregnancy Information Pack

Your Pregnancy Guide including “Breastfeeding – You can do it!”

Mum to be Pack

Mum’s Pack

Newborn Pack

You and Your Newborn Guide

Family Pack

Your Growing Family Guide