

Providing Context to the 2012 Nestlé FTSE4Good BMS Verification

Please note that this paper should be read alongside two other documents:

- [PwC's 2012 Verification Report on Nestlé;](#)
- [Nestlé's response to the verification report.](#)

1. INTRODUCTION AND CONTEXT

1.1 FTSE4Good Index Series

The FTSE4Good Index Series ("FTSE4Good") was launched in 2001 with an aim to provide investors with an index that would measure the performance (returns) of companies that were meeting good standards in terms of environmental and social responsibility. A major feature of the index was that it should encourage improved practices in companies by setting realistic, but challenging standards for each sector. An independent committee was established to oversee the criteria and with them, and the research providers EIRIS, FTSE set about a process to regularly introduce inclusion criteria to encourage improvements in companies around the world. Over the years new criteria have been developed and introduced for environmental management, human and labour rights, supply chain labour standards, countering bribery, uranium mining, nuclear power and the marketing of breast milk substitutes.

1.2 Catalysing Improvements in Corporate Practices and Applying "Teeth"

The continual evolution of standards has led to hundreds of companies improving their practices to remain in the index or gain inclusion. This has been found in a range of external academic studies. For example, research from Edinburgh and Nottingham Universities have demonstrated how effective the FTSE4Good Index is, and this related corporate communication and dialogue, has been in effecting change in corporate behaviour. From an analysis of the responses of over a 1000 companies the academics found that the rate of improvement on ESG more than doubles when the company is in direct dialogue with FTSE regarding FTSE4Good criteria¹.

To date, this programme of corporate communication and dialogue has been a remarkable success, with around 60% of over 1000 dialogues FTSE has had with companies in the last 12 years resulting in improvements to ESG disclosure and practices. However there have also been over 300 companies deleted for failing to keep pace with the implementation of tougher criteria standards.

1.3 FTSE4Good Breast Milk Substitute (BMS) Marketing Criteria

The issue of BMS marketing has attracted significant attention over the years, due to the inappropriate marketing of infant formula and the resulting health impact on infants. This issue is of concern to a range of organisations, as well as investors, around the globe.

When the FTSE4Good Index was first launched there was an exclusion for all companies who were alleged to have breached the WHO Code and its subsequent resolutions. All companies faced these allegations. Therefore in the infant food sector FTSE was not able to engage the companies as they were all being excluded from the index. The experience in other areas is that once you have standards that leading companies can meet, they will compete with others in their sector to meet the requirements and the standards can then be raised over time.

Due to the complexity of this issue and the high levels of mistrust between NGOs and industry FTSE set up an independent expert committee to oversee the development of suitable criteria. Then FTSE, together with the independent FTSE4Good BMS Marketing Committee, developed detailed and specific criteria to assess companies in this sector. In September 2010, the FTSE4Good Policy Committee approved final revisions to the FTSE4Good Breast Milk Substitutes marketing inclusion criteria. These set requirements for company policies which cover lobbying, management systems, and reporting. The criteria draw from the WHO International Code of Marketing of Breast-Milk Substitutes and subsequent World Health Assembly (WHA) resolutions ('The Code'). The revised criteria were drafted by FTSE and updated based on the outcomes of a consultation exercise with companies, investors and NGOs.

Given the higher risk of negative consequences from inappropriate marketing of breast milk substitutes in some countries, the criteria prioritise countries that have the highest rates of child malnutrition and child mortality. There are 149 countries that are currently identified by FTSE as 'higher risk'. In these countries the index criteria thresholds applied are the toughest. Over time FTSE intends to include further attention to activities in lower risk countries too with an eventual aim of a single global approach.

For further details on the FTSE4Good Inclusion Criteria please see the full criteria set out on the website at:

http://www.ftse.co.uk/Indices/FTSE4Good_Index_Series/Downloads/F4G_Criteria.pdf

See Mackenzie et al (Nov 2011) at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1966474 and Slager (2012) at http://www.nottingham.ac.uk/business/CCSR/assets/The-FTSE4GOOD-index_engagement-and-impact.pdf

1.4 BMS Marketing Verification Assessment

Once a BMS manufacturer meets the criteria and is included in the index, FTSE, together with independent third parties, commission verification assessments of the company's practices. The verification is not a one-off assessment but an on-going requirement, following inclusion into the index, whereby BMS manufacturers need to demonstrate that the practices on the ground follow their policies.

This includes aspects such as whistleblowing procedures, senior executive responsibility, training of sales and marketing staff, internal monitoring, compliance mechanisms and responding to allegations.

The verification is conducted in the following places:

- Global Headquarters;
- Country operations in two 'higher risk' countries;
- Site visits to clinics, hospitals, health centres and retail outlets and any other sites as appropriate, in the two 'higher risk' countries.

This process aims to encourage improved practices and focuses on how companies can develop

systems for continuous improvement. The results form the basis for positive engagement and dialogue with companies and also inform committee decisions regarding a company's eligibility for deletion from the indices, if there is evidence they are no longer meeting the criteria and failing to address the severity of the issue.

PricewaterhouseCoopers LLP (PwC) has been appointed as the initial assessor for the verification and carried out the verifications in 2011 and 2012. Part of the funding for this verification came from GAIN (the Global Alliance for Improved Nutrition) for both of these initial years and a new funding partner is being identified for future years.

1.5 Nestlé's Inclusion in the FTSE4Good Index Series

In March 2011, Nestlé became the first infant formula company to meet the criteria in full². Those infant formula and food companies that are in the assessment universe and are being assessed include Abbott Laboratories, Danone, Heinz, Mead Johnson, Meiji Dairies and Nestlé.

Pfizer was eventually deleted in September 2011 from FTSE4Good after they acquired Wyeth and were given a period to comply with the criteria but did not manage to do so in time. However in 2012 Pfizer made clear their intention to sell the business and Nestlé moved to acquire it. In December 2012 Nestlé announced that the acquisition of Pfizer Nutrition (the former Wyeth business) was complete and over time will be expected to ensure that the acquired business meets the FTSE4Good standards too.

Nestlé met the selection criteria, as a result of them making some important enhancements. Nestlé's policy commits them to refrain from promoting the following products; infant formula, follow-on formula for use by babies less than 12 months and complementary foods for babies under six months, in all of the 149 countries which FTSE and the FTSE4Good Committee have categorised as 'higher

risk'. The Nestlé policy had taken this line in a number of countries previously but to enter the index had to explicitly cover all the higher risk countries. In addition to having public policies covering the above, the company also provided evidence of management systems covering whistleblowing procedures, senior executive responsibility, training of sales and marketing staff, internal monitoring, investigating allegations and applying compliance mechanisms.

Nestlé are now more public about both their policies (<http://www.nestle.com/CSV/Compliance/Baby-milk>) and where they have identified non-compliances (<http://www.nestle.com/csv/compliance/baby-milk/reporting-compliance>). The company had to demonstrate that they meet the criteria through providing information and evidence to the independent research provider EIRIS, which has then been reviewed by the FTSE4Good BMS Marketing Committee.

Following their inclusion in the FTSE4Good Index Series, Nestlé need to continue to demonstrate that they are meeting the criteria requirements through an independent verification process, that assesses its practices on the ground. In the eventuality that the verification assessment finds poor performance and there is failure to improve, it would result in Nestlé's removal from the index.

Through dialogue with other companies, FTSE hopes to encourage others to make the necessary improvements to their policies and implementation systems to meet the FTSE4Good BMS Criteria. Some companies are closer than others and it is hoped that other stakeholders will also engage companies to encourage them to improve their practices and meet the standards set out in the FTSE4Good BMS Marketing criteria.

1.6 Nestlé's 2011 Verification Assessment

Nestlé has now had two verification assessments. The PwC report published alongside this document covers that carried out at the end of 2012 but the key findings from the 2011 verification were published in a letter from Mark Makepeace, FTSE's Chief Executive to Mr Paul Bulcke, Nestlé's CEO. Links to this letter and to Mr. Bulcke's response. Are set out below:

Letter from Mr Mark Makepeace, FTSE Chief Executive to Nestlé - 14 November 2011

Reply letter from Mr Paul Bulcke, Nestlé CEO - 18 November 2011

In addition, Nestlé's progress against the areas identified for improvement in 2011 were also assessed as part of the 2012 verification.

1.7 Stakeholder Involvement

The FTSE4Good BMS criteria and verification framework were drafted by FTSE and the independent FTSE4Good BMS Committee, and then updated based on the outcomes of a consultation exercise with companies, investors and NGOs, including both UNICEF UK and Save the Children.

² Gerber a manufacturer of complimentary foods, but not a manufacturer of infant formula did manage to meet the criteria and did briefly enter the index but were then acquired by Nestlé.

The verification assessments have been commissioned in collaboration and consultation with a number of organisations including the Global Alliance for Improved Nutrition (GAIN), the Church of England's Ethical Investment Advisory Group (EIAG), the Methodist Church, and the United Reformed Church. Following the first verification, a workshop was organised for those organisations collaborating in the process to understand the results of the verification and to put direct questions to PwC and to Nestlé. A summary of the workshop is set out here:

http://www.ftse.co.uk/Indices/FTSE4Good_Index_Series/Downloads/FTSE4Good_BMS_Verification_Workshop_Meeting_Summary_V1.doc

One of the key recommendations of the workshop was to make the full verification report public, and this document together with the PwC report and Nestlé paper is in response to that request. Another workshop is planned following the publication of this 2012 verification report.

1.8 Nestlé Verification 2012

This paper providing the context is published alongside the 2012 report from PwC and the Nestlé response. The PwC verification report aims to provide the factual findings of the assessment in relation to the FTSE4Good BMS Criteria.

2. DIFFERENCE BETWEEN FTSE4GOOD CRITERIA AND THE WHO CODE

The FTSE4Good Breast Milk Substitutes marketing inclusion criteria build on the WHO Code, but differ from the Code. The criteria require company policies to be aligned with the WHO Code and go further by assessing how a company implements this in practice by covering internal system factors such as:

- senior level accountability and responsibility at HQ and across different country operations;
- internal training systems;
- whistleblowing;
- on-going internal and systematic monitoring of practice against policies;
- investigating and responding to allegations; and
- public reporting on these matters.

The requirements also go a step further than they do for any other FTSE4Good environmental or social criteria area by setting out that, once a company meets the criteria on the basis of documentary evidence provided to our researchers EIRIS and is included in the index, the company is then subject to an independent verification assessment in two of the higher risk countries conducted by a professional audit firm.

The verification assessment is regarding compliance with the FTSE4Good Criteria which include the factors set out above, rather than against the WHO Code per se. Therefore a large part of the assessment is examining whether the company's policies and

systems are working in practice and, if not, then understanding why. In the area of BMS products there are cases where there are differences of interpretation of the Code and we will not be asking the assessors to act as a judge with regards to specific allegations but rather to assess whether the company's practices on the ground are in line with their stated policies regarding not promoting or marketing breast milk substitutes.

It is important to note that the FTSE4Good criteria are much more focused on company practices in higher risk countries than lower risk countries, while the WHO Code is universal in nature. The committee felt the weighting should be placed where there is the greatest risk to baby and infant lives and health, and that the tougher criteria could be expanded to cover the lower risk countries over time.

3. THE VERIFICATION PROCESS

3.1 Process Overview: the verification assessment and its role in the wider assessment process

The verification assessment forms a component of a much broader process that determines a company's inclusion or exclusion from the FTSE4Good Index Series. The process is set out below:

- i. *Company research.* The companies set out in section 1.4 are all assessed against the FTSE4Good BMS Criteria by FTSE's research providers.
- ii. *Compliance reviewed by FTSE4Good BMS Marketing Committee.* The committee review the analysis from the research provider of the company's compliance against the stated FTSE4Good BMS Criteria.
- iii. *Recommendation made to the FTSE4Good Policy Committee* regarding a company's inclusion or deletion from the index based on whether the companies meet or do not meet the stated criteria. The reviews of the index and the associated committee meetings take place twice a year at the start of March and September.
- iv. *Verification assessment by professional assurance firm.* If a company meets the criteria and enters the index this is then followed by a verification assessment which becomes an on-going requirement.
- v. *Findings of the Verification assessment.* These are reviewed by a stakeholder workshop and by the FTSE4Good BMS Committee. Where areas are identified for improvement FTSE will engage the company on the issues raised.
- vi. *Index deletion.* Where significant areas of non-compliance with the FTSE4Good Criteria are identified through the verification assessment process and these are not subsequently addressed by the next verification assessment a company will be deleted from FTSE4Good.

3.2 Selection of Professional Assurance Firm

Proposals were requested from three of the big four audit firms all of which submitted tenders for the carrying out the verification

assessments. The FTSE4Good BMS committee and FTSE reviewed the submissions and selected PwC for the 2011 assessment. This was based on their competency, the fit of their proposal against the specified needs, independence and cost effectiveness. PwC were selected again for the second verification in 2012.

3.3 Planning of Verification Assessment Visits

The preparation for the verification assessment visits has the following stages:

- i. The FTSE4Good BMS Committee reviews the verification tool, framework and country selection matrix in light of the experience from the previous verification assessment round and makes enhancements to it.
- ii. The professional assurance firm refresh the data and apply the revised country selection matrix to identify a shortlist of potential countries to be verified. (Selection information in section 3.4)
- iii. The FTSE4Good BMS Committee sense checks the short list, and chooses two countries from the list for verification procedures.
- iv. The company is provided three to four week's notice of the countries that are to be visited, this is to ensure that local management/ sales and marketing staff are available to be interviewed.
- v. The professional assurance firm identifies local health facilities, distributors, retail outlets, local NGOs, and government agencies to meet while in country.
- vi. The professional assurance firm assesses policies, management process and controls at the company's head office.
- vii. The professional assurance firm then carries out the assessment in the two higher risk countries.

3.4 Country Selection

The country risk matrix was developed in 2011 with PwC and the BMS Committee. Advice was sought in its development from NGOs and ethical investors. The resulting "risk ratings" are an aggregate of over ten factors that are applied to each of the Higher Risk Countries. Full details are set out on the website at:

http://www.ftse.co.uk/Indices/FTSE4Good_Index_Series/FTSE_BMS_Criteria.jsp

In the first year the factors used were: Child mortality, malnutrition, access to improved water, access to midwives, corruption, human development, economic development, WHO member state, BMS regulation, IBFAN allegations, and scale of company activities. For the first verification of Nestlé, India and Zambia were selected as the outputs of the risk assessment matrix based on their high overall risk ratings.

However subsequent feedback from the NGO IBFAN and from the stakeholder workshop led to a number of suggestions including that although BMS regulation was included in the matrix and decision process, its weighting should be increased above the other factors.

India and Zambia had been in lower risk quartiles for BMS regulation but higher risk quartiles for the other indicators.

In the 2012 verification enhancements were made to the country selection matrix. This included:

- The weighting of the state of regulation (implementation of the WHO Code) factor was doubled.
- Two new indicators were added; Estimated number of people (all ages) living with HIV, and the percentage of under-fives with diarrhoea receiving oral rehydration and continued feeding. These were regarded as important additional risk factors that identify increased propensity for formula usage.
- Company market presence and market share information were removed. This was because although a larger presence indicates a greater impact on the population, a small presence may mean a greater likelihood that there is less oversight and control over marketing practices.

This led to Laos and Morocco being selected by the Committee, based on the PwC analysis for the 2012 Nestlé verification assessment.

4. MANAGING DILEMMAS AND CHALLENGES

4.1 The Need for a Transparent Yardstick and Dialogue

The issue of BMS marketing is highly contentious and there is very little trust between industry and NGOs. Over the years while FTSE has been developing criteria and assessing companies on this issue it has faced criticism from both the BMS industry and from certain NGOs. Developing criteria that identify best corporate practices involves striking a fine balance between designing criteria that are (i) credible and aspirational but that are also (ii) realistic and feasible for the leaders in the industry to meet.

For too long there has been almost no interaction or dialogue between industry and civil society groups on this issue. FTSE has worked hard to contribute to the debate and the publication of the verification assessment report aims to further this. The report contains both positive findings showing how Nestlé has made important strides in developing a responsible approach to marketing BMS products while also highlighting areas that should be improved further.

It is an important act of trust for a company to allow a third party to undertake an independent verification assessment of their operations and to publish it. This needs to be recognised and applauded. This spirit of transparency and ability to discuss and address difficult issues is a crucial part of the process of achieving real and meaningful improvements.

There will be some organisations that will focus on the improvement area findings and use these to criticise both the company and the FTSE assessment and verification assessment process itself. However there will be others who will use this for positive dialogue and corporate engagement seeking continued momentum.

4.2 Universality of the WHO Code vs FTSE's Focus on Higher Risk Countries

As set out in Section 2 the criteria build on the WHO Code by not only requiring policies to be aligned but through examining how effectively companies embed this into their governance, compliance systems and reporting. However the FTSE4Good criteria are much more focused on company practices in higher risk countries rather than lower risk countries, while the WHO Code is universal in nature. In this respect the committee felt the weighting should initially be placed where there is the greatest risk to baby and infant lives and health, and that the tougher criteria could be expanded to cover the lower risk countries over time. A total of 149 higher risk countries have been identified which are set out in the criteria available on the website at:

http://www.ftse.co.uk/Indices/FTSE4Good_Index_Series/Downloads/F4G_Criteria.pdf

This method is not supported by some NGOs but the Committee felt that this was a pragmatic approach that should achieve the greatest impact in terms of both company practice and in terms of the health impact on infants globally.

4.3 Securing Corporate Involvement

Whilst FTSE has had positive dialogue with some BMS manufacturers, this has not been achieved with others. A number are a very long way below the FTSE4Good BMS marketing Criteria threshold. They view the criteria as not being realistic because it significantly limits their ability to market their infant formula, follow-on and complimentary food products and hence are not prepared to engage and improve towards meeting the index inclusion criteria. When other companies in addition to Nestlé also meet these standards and enter the index it will put pressure on others to improve their practices too. The Committee are cautiously optimistic that based on positive dialogue with some of the companies and some clear improvements that are currently being made that this can be achieved over time.

4.4 Securing NGO Involvement

FTSE's engagement with global NGOs has been very positive with most providing very useful advice and input into the development of our methodology.

IBFAN has been critical of FTSE's approach. FTSE's ESG (Environmental, Social and Governance) Director has had much dialogue with IBFAN and FTSE's Chief Executive has also personally met with IBFAN to listen to their perspectives, to explain the aims and objectives of FTSE4Good with respect to providing a tool for investors, and FTSE's approach to developing market based standards and raising these over time. Please see below for letters exchanged with IBFAN.

<http://babymilkaction.org/sites/info.babymilkaction.org/files/IBFANtoFTSE%20080312.pdf>

http://www.ftse.com/Indices/FTSE4Good_Index_Series/Downloads/FTSE_Letter_to_Baby_Milk_Action_13.3.2012.pdf

Once the countries for verification have been selected there is an effort to make contact with local civil society groups through global NGOs, some of which have been helpful at connecting FTSE with their local offices, whilst others have been less supportive.

In organising the verification assessments it is extremely useful for the assessors to be able to visit these local NGOs to seek intelligence and any evidence of inappropriate marketing practices. In the first year this was achieved in the countries visited but in the second year this proved much more difficult, as a number of NGOs declined the opportunity to meet the assessors. When responding they had misconceptions about the verification, for example that their comments would not be kept confidential, and that this was a process led by Nestlé rather than FTSE.

4.5 Advance Notice of Verification – Striking the Right Balance

There is a need to strike the right balance between providing some warning of a verification assessment of a particular country to ensure key company personnel are available, and providing an element of surprise. Since the assessment is about the extent to which the companies internal systems (such as training, whistleblowing and compliance systems) are working in practice it is crucial to ensure that relevant staff would be available for interviews and meetings with the assessors.

The assessment of systems includes assessing accountability from senior executive staff down to country sales and marketing representatives, that staff understand the policy and are being properly trained, and checking that appropriate corrective actions are taken following non-compliances. At the same time the in-country visits involved organising unannounced visits to retailers and health care facilities, and meetings with NGOs, to understand what is happening in practice.

In the first verification assessment in India and Zambia in 2011, PwC had provided Nestlé with around 4 weeks' notice and this was reduced to 2-3 weeks for the 2012 verification assessment in Laos and Morocco. Furthermore, it is worth noting that a firm of professional assurance providers was appointed to perform the assessment, that were well versed in applying scepticism when performing this type of engagement.

There has been some feedback that these verifications could be entirely unannounced. For the reasons set out above this would not be practical. In addition it is important to note that FTSE is not conducting "dawn raids" and that ultimately this whole process should build trust, understanding and mutual learning between all parties.

5. NEXT STEPS

5.1 Following up on Findings: Workshop with Collaborating Investors and NGOs

There has been an ongoing dialogue about the FTSE4Good BMS Criteria and verification process with a variety of stakeholders and NGOs. Groups that had previously provided advice in the development

of the criteria and verification tool were invited to discuss and provide feedback on the results of the first verification and next steps following the 2011 verification. Expert participants came from charities, ethical investor groups, NGOs and the FTSE4Good BMS Marketing Committee. PwC and Nestlé were also present and there was a discussion of improvements that could be made both in terms of Nestlé’s practices and the verification process. A report on the website records the meeting discussion can be found at:

http://www.ftse.co.uk/Indices/FTSE4Good_Index_Series/Downloads/FTSE4Good_BMS_Verification_Workshop_Meeting_Summary_V1.doc

A follow-up workshop will also be organised following the publication of this second verification findings report which will cover; the steps taken by Nestlé against the findings of the first verification, the findings of the second verification, and the verification process itself.

5.2 Following up on Findings: Nestlé Engagement

In both verifications a key finding of the BMS Committee, based on the countries visited and the analysis carried out by PwC, was that Nestlé, on-balance, was meeting the FTSE4Good BMS Marketing criteria. These criteria are tough and require companies to go well beyond legal requirements in terms of taking a responsible approach to infant food marketing. This is an important achievement and particularly noteworthy as Nestlé is the only company to currently meet this. However at the same time both assessments have identified areas where the FTSE4Good BMS Committee would like Nestlé to improve.

1st verification (2011) Findings

As set out in Section 1.6 above the key findings from the previous 2011 verification were summarised in a letter from FTSE’s Chief Executive Mark Makepeace to Nestlé’s Chief Executive Paul Bulcke. This included areas for improvement and since then FTSE and Nestlé staff have been in dialogue regarding these areas. These areas covered; (i) influencing third parties, (ii) activities that may be regarded as promotional, (iii) board reporting and (iv) transparency and whistleblowing. The recent 2012 verification assessment also considered these areas to assess the progress Nestlé has made and hence feature in the PWC report.

2nd verification (2012) Findings

Nestlé has been provided with the 2012 PwC report on findings and were given the opportunity to respond to the report and its findings. Their response together with this paper and the PwC findings report itself are being published together on FTSE’s website. The FTSE4Good BMS Marketing Committee will review Nestlé’s subsequent progress, and FTSE staff will be following up with Nestlé on the areas identified for improvement.

5.3 FTSE4Good Index Eligibility and Verification Findings

The verification findings play an important role within a wider process that determines a company’s on-going inclusion in the FTSE4Good Series as set out earlier in section 3.1. The findings from the verification assessment provide a basis for constructive dialogue with the company. There will be findings which are not full breaches of the FTSE4Good Criteria but signify areas for improvement which FTSE will raise with the company. However the verification also provides an additional test for index inclusion; where significant areas of non-compliance with the FTSE4Good Criteria are identified through the verification assessment process and these are not subsequently addressed by the next verification assessment, a company will be deleted from FTSE4Good.

The FTSE4Good index and its criteria have teeth. Over the years since launch, over 400 companies have been deleted for ceasing to meet the evolving environmental and social inclusion criteria. It is worth noting that Pfizer was deleted in 2011 from FTSE4Good for not meeting the BMS Marketing Criteria. Nestlé in December 2012 announced the completion of its acquisition of Pfizer Nutrition. Over a period of 12 months Nestlé will need to bring the newly acquired Pfizer Nutrition business up to its standards in order to retain its inclusion in the index.

5.4 Future of Verification Assessments

Feedback has been provided from NGOs and SRI investors that this form of external verification assessment is an essential part of building trust between industry and the NGO community and in facilitating meaningful change, and that FTSE as an independent intermediary is important in achieving progress.

FTSE has put significant resources into an issue that affects only a small number of companies (see section 1.4) from a universe of 2400 companies that were being assessed on a variety of environmental, social and governance performance areas. At the right point FTSE will need to return to a “measuring” rather than “facilitating” function.

While FTSE is pleased to facilitate this process, and will continue to do so for the time being, increasingly other groups need to get involved. The involvement of GAIN in part funding the first two verifications has been crucial and FTSE would like to thank GAIN for providing this. Other credible partners are being sought to provide funding and input to take this initiative further and eventually FTSE would like to see a collaborative body comprising of both NGOs and companies to collectively oversee this form of third party verifications.

Data definitions available from www.ftse.com. For further information visit www.ftse.com, email info@ftse.com or call your local FTSE office:

Beijing	+86 (10) 8587 7722	Milan	+39 02 3604 6953	San Francisco	+1 888 747 FTSE (3873)
Dubai	+971 4 319 9901	Mumbai	+91 22 6649 4180	Sydney	+61 (2) 9293 2864
Hong Kong	+852 2164 3333	New York	+1 888 747 FTSE (3873)	Tokyo	+81 (3) 3581 2811
London	+44 (0) 20 7866 1810	Paris	+33 (0)1 53 76 82 89		