



ACCESS TO  
**NUTRITION**  
INITIATIVE

# Spotlight on lobbying

Baseline benchmark of major breast-milk substitute manufacturers' lobbying policies, management systems and disclosure

May 2021



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# 1. Executive summary

## Introduction

Lobbying is a well-established and widespread facet of the political process. When exercised properly, it can strengthen accountability and participation in government, and the legislative and regulatory system. However, when exercised improperly, it serves well-financed special interests and damages political legitimacy.

A cause for concern among stakeholders whose goal is to protect and encourage breastfeeding, and infant and young children's nutrition, is that most countries have not yet adopted legal measures to give full effect to the International Code of Marketing of Breast-milk Substitutes (BMS); in 2020, the measures of only 25 'substantially align to the Code'. This comprehensive set of recommendations to restrict the marketing of BMS was adopted in 1981 by the World Health Assembly (WHA). It has since been amended and augmented by many subsequent WHA resolutions. (Together these documents are referred to as 'The Code').

Many public health advocates believe that one of the reasons that so few countries laws and regulations fully implement The Code is lobbying by BMS manufacturers. They advance two key arguments for curtailing lobbying by companies and their representative organizations: 1) they have a conflict of interest: they are motivated primarily to protect and increase their profits and shareholder returns, which are predicated on ever-greater sales of their products; 2) companies have more resources to dedicate to influencing policymakers, and therefore have a disproportionate effect on the process. However, many of the world's largest BMS manufacturers have recently made public statements in support of the adoption of legislation and regulations to implement The Code, in part or in full.<sup>1</sup> These companies see regulation as a way to 'level the playing-field' because it is likely to be less commercially damaging than unilaterally adopting policies to implement The Code when their competitors don't.

ATNI is aware of increasing interest among many stakeholders in companies' lobbying and influencing activities – in many sectors, on many issues. It is therefore likely that baby food companies will be scrutinized more closely about such activities in future, both in terms of the overall corporate stance that they take and their activities within each market in which they operate or enter.

As a first step towards exploring the topic of lobbying in relation to The Code, this report evaluates the lobbying policies, management systems and disclosure of the world's nine largest BMS manufacturers. Together they account for around 54% of global market share in this category. It is the first report that the Access to Nutrition Initiative (ATNI) has published focusing exclusively on lobbying. The aim of the research is to better understand these companies' approaches to lobbying and the extent to which their policies and practices align most fully to the newly developed [Responsible Lobbying Framework](#) (RLF).

## Methodology

The methodology used to assess companies was developed by ATNI based on the RLF which was developed by a multi-stakeholder group of companies and Civil Society Organizations (CSOs) during a multi-year dialogue process facilitated by the Meridian Institute. As responsible lobbying is an emerging and relatively new concept, the RLF represents the 'gold standard' in relation to responsible lobbying. It can be understood as a roadmap towards best practice that users work towards over time.

It is important to note that this report does not evaluate companies' actual lobbying practices in countries around the world, or in relation to international standard-setting bodies like Codex Alimentarius or bodies such as the WHO, WHA, WTO or others.

The scoring and ranking presented is based solely on information publicly available by 31<sup>st</sup> July 2020. The evaluation focuses on three elements of companies' lobbying: policy commitments, management systems, and disclosure. Information published by third parties is not included nor is confidential



information provided by the companies to ATNI (whereas both types of information are included in ATNI's Global and Spotlight Indexes). The report therefore does not provide any insights into how these companies have lobbied around the world or on which topics they have lobbied in relation to breast-milk substitutes. In future, ATNI hopes to be able to explore and report on these important dimensions of lobbying.

Scores are presented in percentages, based on the scoring system outlined in the report. A score of 100% would indicate that a company:

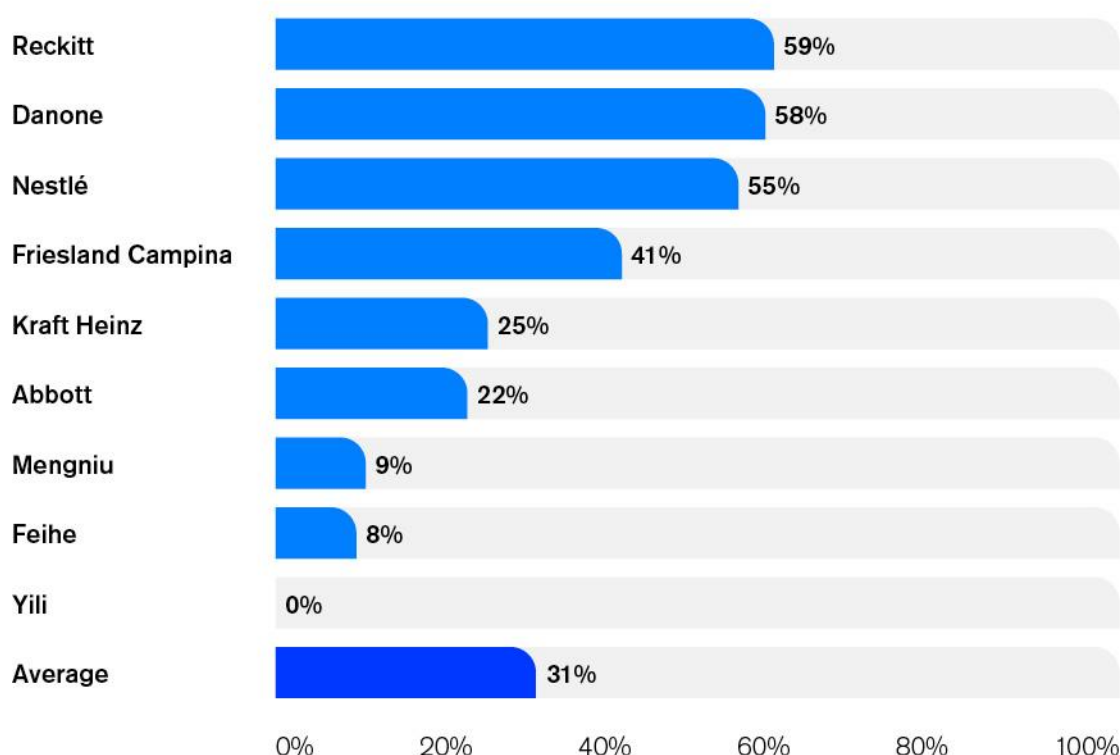
- Has a policy that embodies all of the key commitments set out in the methodology in terms of its approach to lobbying.
- Has effective management systems to implement all of those commitments.
- Publishes its policy and other information to provide transparency about what it lobbies on, and how.

It is important to note that while companies' disclosure on this topic is to a large extent voluntary it may also be influenced – in terms of what can and cannot be published - by the requirements of national regulatory authorities, particularly those in which the company is headquartered.

## Ranking

As shown in Figure 1, Reckitt ranked first with a score of 59%, followed closely by Danone with a score of 58%, closely followed by Nestlé which scored 55%. FrieslandCampina ranks fourth, with a score of 41%, with KraftHeinz and Abbott in fifth and sixth places, with scores of 25% and 22% respectively. Mengniu scored 9%, Feihe 8% and Yili 0%. The average score across all nine companies was 31%.

**Figure 1: Final weighted scores**



## Findings

The evaluation found evidence of some good practice, as illustrated by three companies scoring well over 50%. There were only a handful of indicators on which no company scored any points. This means that the major players in this sector would make rapid progress if every company adopted best practice from within its peer group. Many recent improvements were identified, especially in terms of strengthened policies, and increased and improved disclosure, suggesting that this issue is on many companies' agendas and improvement is already taking place.



## **ATNI's recommendations**

In order to improve their policies, all companies are urged to review the RLF, look at the leading companies' policies, and the indicators in the policy section of the methodology, and embody those commitments in their own policies.

In terms of management systems, many companies will already have in place functions or processes to implement ethics, anti-bribery and corruption and similar corporate commitments. Such systems can simply be expanded or adapted to ensure that the company's responsible lobbying policy is delivered.

Transparency is critical in relation to lobbying. There is ample scope for companies to improve their disclosure. Currently, companies mainly disclose their lobbying activity and spending via national or regional transparency registers where mandated by regulation. This does not usually provide a complete picture of a company's lobbying activities in all of its markets. ATNI encourages them to directly report such activity on their own websites.

Companies are encouraged to base their disclosure on the 'show, don't tell' principle. They currently publish few practical and worked examples of how policies and systems work in practice; many more such examples would give their stakeholders more confidence in the sincerity of, and follow through on, their commitments.

BMS-specific disclosure is currently lacking. While several examples were found of companies' lobbying on the broader sustainability or corporate agenda in their reports and on their websites, few were found on BMS issues specifically. Companies are encouraged to start making such references, as a sign that they view this area as a key priority in respect of their responsible lobbying.

## **Conclusion**

This report shows there are clear and relatively easy steps that many companies can take to improve their lobbying policies, management systems and disclosure. In most cases, they can find inspiration within their sector while also seeking to emulate emerging practice in other sectors – particularly in the oil, gas and mining sector in relation to lobbying related to climate change - that can be adapted to this topic. While some of the companies are already communicating and to some extent demonstrating their commitment to lobby responsibly, this review shows they all have significant room to improve. We urge them to make public commitments in response to this report that demonstrate their intention to support in all markets in which they operate the adoption of national legal measures that implement The Code in full to contribute to protecting the health of mothers and babies around the world. We hope this report will also be a valuable source of information for stakeholders with an interest in this topic.



## 2. Introduction

### 2.1 Rationale for this report

Over recent years, ATNI has published assessments within its Global Indexes of the world's major baby food companies' marketing policies, practices and disclosure. ATNI places substantial emphasis on infant and young child nutrition because increasing the level and duration of breastfeeding is critical to improving life-long health and to achieving both the Sustainable Development Goals and WHO's maternal, infant and young child nutrition targets.

One of the most effective ways to protect and encourage breastfeeding and improve the diets of young children is for governments to adopt laws and regulations that compel all baby food companies selling their products in the country to market their products in line with the 1981 International Code of Marketing of Breast-milk Substitutes and subsequent relevant World Health Assembly (WHA) resolutions (together referred to as 'The Code'). In addition, international standard-setting agencies like Codex can adopt strong standards for product labelling and which support responsible marketing. However, a cause for concern among stakeholders whose goal is to improve breastfeeding and infant and young children's nutrition is that many countries have not yet adopted legal measures to give full effect to The Code.

Many public health advocates attribute the lack of comprehensive and effective legislation in respect of BMS marketing in many countries, to some extent, to widespread lobbying by baby food companies and/or industry and trade associations.<sup>2 3 4 5</sup> Advocates advance two key arguments as to why lobbying by companies and their representative organizations should be curtailed: 1) they have a conflict of interest: they are motivated primarily to protect and increase their profits and shareholder returns, which are predicated on ever-greater sales of their products; 2) companies have more resources to dedicate to influencing policymakers and therefore have a disproportionate effect on the process. However, many of the world's largest BMS manufacturers have recently made public statements in support of the adoption of legislation and regulations to implement The Code, in part or in full.<sup>6</sup> These companies see regulation as a way to 'level the playing-field', as it is likely to be less commercially damaging than unilaterally adopting policies to implement The Code when their competitors don't.

A similar set of concerns has been raised about other sectors, notably the oil, gas and mining sectors, and the broader food sector. Here too, many companies and industry associations appear to be trying to thwart legislators' efforts to effectively regulate corporate activity in order to achieve international climate goals and health goals. Stakeholders – particularly institutional investors – are beginning to take [action](#)<sup>7</sup> to challenge companies' lobbying in relation to regulatory processes designed to develop and implement measures to curb [climate change](#)<sup>8</sup> and [obesity](#)<sup>9</sup> respectively.

To establish a better understanding of, and to drive more responsible corporate practice in relation to lobbying related to BMS marketing, ATNI sought and was granted funding by Irish Aid to develop a tool to assess and track the lobbying policies, management systems and disclosure of the world's largest baby food companies. This report sets out the methodology and results of that assessment, and the first benchmark of its type on this important topic.

### 2.2 Lobbying and influencing policymakers

The practice of lobbying is a common part of the political process in many countries, yet it raises important questions about the nature and functioning of political systems. To quote the Organization for Economic Cooperation and Development (OECD):

*"When exercised properly, lobbying can strengthen accountability in government and the participation of citizens in policymaking. But when lobbying becomes an excessively elite profession, exclusively serving*



*well-financed special interests, it can become quite damaging to the citizen's perception of political legitimacy."*<sup>10</sup>

It is useful to understand just how widespread lobbying is. Take the European Union's (EU) Transparency Register, for example. This is the mandatory self-disclosure vehicle through which lobbyists need to disclose key information if they want long-term access to the European Parliament's premises or hold meetings with members of the European Commission; as of Nov. 16, 2020, there were over 12,000 registrants. These were roughly 60% from the private sector and 40% from 'civil society' – think tanks, research and academic institutions; organizations representing churches and religious communities; and organizations representing local, regional and municipal authorities, and other public or mixed entities.<sup>11</sup> According to analysis of the register by Politico, EU lobbyists spent 1.7 billion euros in 2016.<sup>12</sup> In the United States of America (USA), over 4,500 registrants representing over 17,000 clients were recorded on the Lobbying Disclosure Act database (similar to the EU Transparency Register) as of Sept. 30, 2018. In total, over 13,000 individual lobbyists were disclosed by these registrants.<sup>13</sup>

Some commentators distinguish between lobbying and advocacy. This distinction is often based on whether the activity is aimed at specific legislation or more broadly about increasing the prominence of an issue. The former is understood to be lobbying, the latter advocacy. It often follows that lobbying is perceived as bad and advocacy as good; the inference is that the distinction depends on the validity of the cause. However, this distinction is subjective. In the words of the [OECD](#), *"attempts to distinguish 'good [advocacy]' from 'bad lobbying' are fraught with normative judgement."*<sup>14</sup> Therefore, the RLF does not make a distinction based on the *cause*. Instead, the principal distinction between good and bad lobbying (or good and bad advocacy for that matter) is the *process*, codified by the Framework.

Transparency International defines lobbying as follows<sup>15</sup>, the definition on which this work is based:

*"any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision-making and carried out by or on behalf of any organised group. Lobbying can also include direct or indirect attempts to influence public opinion, outside of normal advertising and marketing activity, with a view to impacting public decision making"*

- Transparency International, UK

## 2.3 Lobbying and BMS

The marketing of BMS has been controversial since the 1970s. While BMS were first developed in the late 1860s to support mothers who could not breastfeed, advertising and promotion led to a steady increase in their use. This corresponded with many changes in societies, including but not limited to women's increasing participation in the workforce, in addition to poor maternity leave, pay and protection offered by governments and/or employers, and a lack of support services for breastfeeding. Cultural factors also play a role. Many drivers, including increasing marketing and advertising of BMS, have combined over time and resulted in a decline in breastfeeding rates.

BMS were marketed in high, middle and low-income countries alike, often being promoted as 'modern' and 'better' than breastmilk. In developed countries, breastfeeding rates dropped from over 70% in the 1930s to 14% in the 1970s,<sup>16</sup> driven also by changes in lifestyle for parents but also by the availability and prominence of BMS. By the 1970s, evidence of the inferior health outcomes from BMS in comparison with breastfeeding had become increasingly clear and continues to mount.<sup>17</sup>

The WHO, United Nations Children's Fund (UNICEF), CSOs, infant food industry and experts came together to develop a code to limit BMS marketing. [The International Code of Marketing of Breast-milk Substitutes](#) was adopted by the WHA in 1981. The Code sets out various specific restrictions on the marketing of BMS, for example prohibiting the use of baby pictures to idealize formula or the promotion of BMS in health facilities or through health workers. Since 1981, it has been clarified and strengthened through a number of subsequent resolutions over the years. Together the original code and subsequent resolutions are referred to as 'The Code'.<sup>18</sup>



Because it does not have legislative powers, WHO depends on countries (its Member States) to implement The Code in national legislation. As shown in Figure 2, the latest [Marketing of Breast-milk Substitutes: National Implementation of the International Code Status Report 2020](#) found that only 25 countries are 'substantially aligned' with The Code, out of 194 WHO Member States.<sup>19</sup> A further 42 are 'moderately aligned'; 69 had 'some provisions of The Code included' and 58 had no legal measures at all. While many large BMS manufacturers publicly state their support of The Code to some extent, there is anecdotal evidence that in many countries, industry has lobbied against such measures.<sup>20 21 22</sup>

ATNI's objective in beginning to focus on this issue, and the aim of this report specifically, is to stimulate baby food companies to be responsible in their lobbying and to support the adoption of comprehensive, well-drafted legal measures in the markets in which they operate, to give effect to The Code and thereby protect breastfeeding.

ATNI is aware of increasing interest among many stakeholders in companies' lobbying and influencing activities – in many sectors, on many issues. It is therefore likely that baby food companies will be scrutinized more closely about such activities in future, both in terms of the overall corporate stance that they take and their activities within each market in which they operate or enter.





## 3. Research scope and process

### 3.1 Company scope

This report encompasses the world's nine largest BMS manufacturers by total global revenue in 2019 (see Table 1). According to Euromonitor International, in 2019, global sales within the baby food sector (including all types of formulas and baby foods) were USD \$67.3 billion. The eight firms whose data is publicly available account for 54% of 2019 global market share.

**Table 1: Nine largest BMS manufacturers by total global revenue (2019), in alphabetical order**

Company	HQ location	Total company revenue (2019, \$m <sup>+</sup> )	Total baby food revenue (2019, \$m <sup>+</sup> )	BMS revenue % of total company revenue
Abbott <sup>23</sup>	USA	31,904	4,161	13%
Danone <sup>24</sup>	France	28,328	8,498 <sup>**</sup>	30% <sup>**</sup>
Feihe <sup>25</sup>	China	1,986	1,815	91%
FrieslandCampina <sup>26</sup>	Netherlands	12,649	1,451 <sup>***</sup>	11% <sup>***</sup>
KraftHeinz <sup>27</sup>	USA	24,977	512	2%
Mengniu <sup>28</sup>	China	11,439 <sup>*</sup>	1,139 <sup>*</sup>	10%
Nestlé <sup>29</sup>	Switzerland	93,206	15,098 <sup>****</sup>	16% <sup>****</sup>
Reckitt <sup>30</sup>	UK	16,337	3,790	23%
Yili <sup>31</sup>	China	11,514 <sup>*</sup>	N/A	N/A
<b>Total</b>		<b>232,340</b>	<b>36,464</b>	

All figures from companies' own reports. See references associated with each company's name.

+ Currencies converted to \$ using average conversion rates for 2019

\* 2018 data

\*\* Early life and medical nutrition, which includes BMS and other products

\*\*\* Specialized nutrition, which includes BMS and other products

\*\*\*\* Nestlé Health Science, which includes BMS and other products

N/A Data not available in the public domain

These are the same nine companies that will be included in ATNI's forthcoming BMS Marketing Index. The intention is to provide a parallel and more in-depth look at these companies' lobbying policies and practices than provided by the limited number of indicators used within the BMS Index methodology, which predominantly focuses on companies' marketing.

### 3.2 Methodology and research process

ATNI developed the methodology used to assess the companies by adapting the [RLF](#). This Framework was originally developed by a consultancy appointed by group of CSOs and multinational companies involved in BMS manufacture during a multi-year dialogue process facilitated by the Meridian Institute<sup>1</sup>. The ultimate goal of the process was that more babies would be optimally breastfed which would lead to the improved nutrition and health of mothers and babies. The purpose of the dialogue was to develop and implement a path towards compliance with The Code, including ensuring availability and safe use of

<sup>1</sup> The [Meridian Institute](#) is a mission-driven, nonprofit consultancy founded in 1997 based in the U.S. It specialises in helping clients and partners to take action to drive transformative change to address complex problems.



BMS when needed. It therefore addressed a range of issues related to BMS marketing and infant nutrition, including lobbying. ATNI was part of the working group that steered the development of the Framework. While the detailed terms and proceedings of the Meridian process remain confidential, all parties agreed that the Framework provided a valuable tool to increase accountability and transparency, and should therefore be publicly available. Participants also agreed that the Framework had wide application to various sustainable development topics and sectors, and therefore did not need to be framed as BMS-specific. The Framework's authors considered 27 sources from international institutions, NGOs and third-sector organizations, as well as academia, and eventually used 14 sources in drafting the framework. It has been welcomed by several organizations. Further information is available at [www.responsible-lobbying.org](http://www.responsible-lobbying.org)

ATNI strongly welcomes the development of the RLF as it provides clear principles on which BMS manufacturers – in this case – can base their lobbying policies and practices and demonstrate – through greater disclosure – their active support of legal measures to implement The Code. As responsible lobbying is an emerging and relatively new concept, the RLF represents the 'gold standard' in relation to responsible lobbying. It can be understood as a roadmap towards best practice that users work towards over time.

The RLF comprises five principles (as shown in Box 1) and 22 sub-principles.

#### **Box 1: The five principles of the RLF**

1. Legitimacy: "Responsible lobbying will never be inconsistent with the public interest".
2. Transparency: "Responsible lobbying organizations will be open, complete and truthful in their communications on the topic."
3. Consistency: "Responsible lobbying organizations will practice what they preach, remaining consistent with their professional codes, organizational values and other public positions."
4. Accountability: "Responsible lobbying organizations and those who lobby for them will be accountable to stakeholders for their actions."
5. Opportunity: "Responsible lobbying organizations will coordinate and align activities with others when they identify issues that further the public interest and are of common concern."

ATNI transposed the RLF into an [ATNI-style methodology](#), with 33 indicators to evaluate companies, organized into the three indicator types:

1. Policy commitments.
2. Management systems.
3. Disclosure.

Each indicator has clear scoring levels, describing the requirements that need to be met for points to be awarded. In keeping with ATNI's Global Index methodology, a maximum of 10 points was awarded for each indicator.

The full set of indicators is shown in Figure 3. Table 2 shows what companies need to do to achieve 100% on this benchmark.





**Figure 3: Indicators used to assess companies**

#	Indicator
<b>Policy commitments</b>	
1	Consideration of public interest
2	Evidence-based approach
3	Respect for public policy frameworks and relevant laws, standards, codes
4	Political donations
5	Conflicts of interest
6	Codes of conduct to prevent bribery & corruption
7	Revolving door
8	Controls over trade associations and industry policy groups
9	Crowding out
10	Working with others in pursuit of the public interest
<b>Management systems</b>	
11	Accountability and responsibility for policy implementation
12	Conflicts of interest and revolving door
13	Anti-bribery and corruption
14	Political donations
15	Controls over membership of associations/organisations
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies
17	Auditing
18	Whistleblowing mechanisms
<b>Disclosure</b>	
19	Responsible lobbying policy
20	Public interest cases for lobbying positions
21	Respect for public policy frameworks and relevant laws, standards, codes
22*	Nature of lobbying
23*	Memberships
24	Alignment of lobbying principles and practice
25*	Funding and spending
26	Public policy positions
27*	Narrative on lobbying activities
28	Examples of implementing commitments in respect of lobbying in the public interest
29	Examples of implementing commitments on the approach to lobbying
30	Auditing
31	Whistleblowing mechanisms
32	Accessibility and quality of disclosure
33	External stakeholder involvement

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.



**Table 2: Best-practice policy commitments, management systems and disclosure to score maximum points in ATNI's methodology**

Policy Commitments	
1	A clear statement in lobbying policy that the purpose of all lobbying is to support the public interest as well as to meet the company's objectives.
2	A commitment to supporting an evidence-based approach to policymaking, clearly respecting independent, peer-reviewed science.
3	A commitment not to undermine existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code AND Commitment to uphold national laws, standards and any national codes of conduct for lobbyists, and to report any illegal or unethical activity to the relevant legal or oversight authorities
4	A commitment to make no political donations in any markets (but if political donations are made, a commitment to disclose all of them)
5	Comprehensive statements prohibiting conflicts of interest (COI), which clearly apply to lobbying, and that cover a wide range of possible cases of COI and a commitment to disclose any COI's identified
6	Global, comprehensive anti-bribery & corruption provisions (or a separate policy exists) in relation to its interactions with public officials which explicitly references intermediaries
7	Recognition of, and an approach to managing, the issue of the 'revolving door', covering the hiring of former politicians and public officials, and secondments or placement of staff into the public sectors including specific provisions relating to evaluation mechanisms, controls and cooling off periods
8	An explicit statement that it will i) periodically review the positions of trade associations and industry policy groups to which it belongs and assess the extent to which they align with the company's own policy positions, and ii) put in place controls over all lobbyists (in-house and intermediary, paid or unpaid) to ensure that they understand and adhere to organisational policies.
9	An explicit statement that it will respect and safeguard the opportunity for other interest groups to lobby and a specific commitment not to spend disproportionate resources on lobbying to crowd out other interests regardless of legal caps on political donations.
10	A commitment to i) pursuing opportunities to take part in multi-stakeholder partnerships, with other companies, CSOs and others, to lobby together where a common position that supports key public interest outcomes can be found; ii) pursuing opportunities for cooperation between companies and CSOs to promote and support governments' efforts to adopt greater transparency and accountability standards relating to lobbying; iii) involving external stakeholders in the development of lobbying strategy, positions on specific issues and in reviewing performance.
Management Systems	
11	Clear accountability and responsibilities for implementation of the policy: i) Board has oversight of the lobbying policy, lobbying positions, processes and practices, including the lobbying activity of third-party organisations it is a member of; ii) a named Executive / function with responsibility for implementing its policy on lobbying and engagement; provides clarity on control mechanisms (e.g. regular reporting to the Board, internal audits)
12	Processes used to implement COI commitments are described, as are a credible dispute resolution process for COI incidences and processes to ensure that it upholds and manages its commitments related to avoiding the 'revolving door'



13	Robust processes and systems are described to implement its anti-bribery and corruption policies
14	Tracking systems and enforcement mechanisms are outlined that assure adherence to its policy on political donations FOR ALL MARKETS
15	Processes are described to: i) identify the policy positions of each organisation it is considering becoming a member of, or is already a member of; ii) review & manage the relationships with membership bodies; iii) address any misalignment between the company's policy and the association's policy, e.g. engagement with the organisation escalating to withdraw.
16	Processes are described about: i) how the company informs and trains staff involved in lobbying about its policies, standards and systems; ii) informs and trains third parties involved in lobbying about its policies, standards and systems; iii) investigates and sanctions any breaches of the company's lobbying policies by both staff and third parties.
17	<p>Periodic external audits are commissioned that include review of:</p> <ul style="list-style-type: none"> <li>• all public disclosures, to ensure alignment with policy, accuracy and completeness</li> <li>• all lobbying activities undertaken by the organisation and their alignment with the policy</li> <li>• controls over third-party membership organisations including trade associations, industry associations, intermediaries who lobby on the company's behalf (paid or unpaid), to ensure the effectiveness of the controls</li> </ul> <p>Periodic internal audits are undertaken that include review of:</p> <ul style="list-style-type: none"> <li>• all public disclosures, to ensure alignment with policy, accuracy and completeness</li> <li>• all lobbying activities undertaken by the organisation and their alignment with the policy</li> <li>• control over third-party membership organisations including trade associations, industry associations, intermediaries who lobby on the company's behalf (paid or unpaid), to ensure the effectiveness of the controls.</li> </ul>
18	A facility is outlined within its internal whistleblowing mechanism that provides all employees the chance to raise anonymously any concerns or breaches of the organisation's lobbying policies and codes of conduct, illegal or unethical lobbying activity.
<b>Disclosure</b>	
19	Responsible lobbying policy
20	Many public interest cases for its lobbying positions
21	<p>Statements about which public policy frameworks and relevant laws, standards, and codes are respected when lobbying:</p> <ul style="list-style-type: none"> <li>• International Code of Marketing of Breast-milk Substitutes, and subsequent World Health Assembly resolutions making significant additions or clarifications to the original Code</li> <li>• WHO Framework of Engagement with Non-State Actors</li> <li>• OECD Principles for Transparency and Integrity in Lobbying</li> <li>• Transparency International Standards for Lobbying Regulation</li> <li>• Industry initiatives, such as the International Food and Beverage Alliance (IFBA) Guiding Principles for Stakeholder Engagement</li> <li>• The Responsible Lobbying Framework</li> </ul>
22 MULT	<p>Information on:</p> <ul style="list-style-type: none"> <li>• The identity of direct and intermediary lobbyists engaged</li> <li>• Offices/types of public officials with whom the company has interacted issues discussed</li> <li>• Outcomes sought</li> <li>• Frequency of interaction with public officials</li> <li>• Ultimate intended beneficiaries of lobbying</li> </ul>
23 MULT	All memberships with assurance to demonstrate the list is comprehensive, including board seats and principal activities undertaken with these memberships



<b>24</b>	<p>Information on:</p> <ul style="list-style-type: none"> <li>• Reviews it has undertaken of trade/industry association memberships</li> <li>• Engagement with trade/industry associations to align their positions and standards to those of the company</li> <li>• Any decisions made where mis-alignment is found</li> </ul>
<b>25 MULT</b>	<p>Information on:</p> <ul style="list-style-type: none"> <li>• Spending on direct lobbying</li> <li>• Spending on third-party organisation memberships (e.g. trade and industry bodies)</li> <li>• Political donations, including in-kind contributions</li> <li>• Examples of basing spending decisions on the commitment not to crowd-out other organisations</li> </ul>
<b>26</b>	All public policy positions and other documents submitted to governments globally are shared, or reasons provided for certain documents not being shared (due to a requirement of confidentiality of other parties)
<b>27 MULT</b>	An annual statement/report on its lobbying activities, describing the nature and results of that activity on a global basis
<b>28</b>	<p>Examples of cooperation with NGOs</p> <p>Examples of joint lobbying activity, third party endorsement, effectiveness</p> <p>Examples of advocacy for specific mechanisms (e.g. particular Bills)</p> <p>Examples of support for greater government scrutiny of private sector lobbying</p>
<b>29</b>	<p>Examples of where lobbying was evidence-based</p> <p>Examples of where COI was identified and how it was addressed/avoided</p> <p>Examples of where incidents of bribery &amp; corruption were identified and how they were addressed (anonymised)</p> <p>Examples of where 'revolving door' issues arose and how they were addressed</p>
<b>30</b>	The company publishes the results of both internal and external audits of compliance with its lobbying policy
<b>31</b>	<p>Information relating to its whistleblowing mechanism of:</p> <p>Number of cases raised</p> <p>Number of cases resolved</p> <p>Breakdowns (by geography and/or business unit)</p> <p>Information on resolution, e.g. by type</p>
<b>32</b>	<p>The information the company publishes is:</p> <p>Easy to find/access</p> <p>Comprehensive (global)</p> <p>Well-structured</p> <p>Assured or included within corporate annual assurance processes</p> <p>Presented using external reporting frameworks' taxonomies</p>
<b>33</b>	Multiple examples of how external stakeholders were consulted to understand key issues, developing lobbying positions and strategies and reviewing performance





For each indicator, relevant information was scored. Any information which was publicly available before July 31, 2020 was considered. Scores were decided based on the scoring methodology described directly below, and after several rounds of internal checks and discussions. Refer to the Annex on p.21 for further details on the scoring and calculations.

Multipliers (signified by MULT in Table 2 above) were applied selectively on a number of key indicators in the Disclosure section. These were added to reflect the emphasis that was placed on the idea of completeness under the Transparency principle in the RLF. While all companies disclose specific metrics, mainly through the various transparency registers, it is important to understand whether this provides full coverage of all of a company's lobbying. Therefore, multipliers were applied to the ATNI indicators that are based on the five sub-principles that sit under Transparency in the RLF. These multipliers reduce or increase the total points awarded for the indicator by multiplying the points awarded for the various sub-indicators by a value below, at, or above 1. The various multiplier levels aim to reduce the total score per indicator when companies do not provide clarity on the completeness of their disclosure, while boosting the score when companies do. The multipliers are summarized in Table 3.

**Table 3: Multipliers**

Multiplier	Requirement	Applies to
0.75	No statement of completeness (i.e. stating that the disclosed information covers all lobbying activities).	Indicators 22, 23, 25, 27
1.0	A statement of programmatic completeness ((i.e. stating that the disclosed information covers all lobbying activities at a programmatic level, for example its infant nutrition business).	
1.5	A statement of global completeness (i.e. stating that the disclosed information covers all lobbying activities of the company globally).	
2.0	Evidence of global completeness (e.g. through formal assurance/ external audit processes).	

Draft results were sent, via email, to representatives of each company for which contact information was available. (ATNI endeavored to find contact information for Feihe, Mengniu and Yili but was unsuccessful. These companies therefore had less opportunity to direct ATNI to relevant material that may have been in the public domain. As a result, their scores may be lower than merited).

A call was offered to the other six companies to further explain results; all of those companies took that opportunity. These companies were also asked to provide written feedback and share any public information available by the cut-off date that had not already been considered in the initial assessment by October 9, 2020. ATNI considered all feedback and additional information received before confirming the final scores.

All companies received detailed information on their assessment for each indicator, including: all information that was considered and the source; the number of points awarded; further explanation in cases where the maximum number of points were not awarded; and the best practice example found across all evaluated companies for each indicator, to inspire improvement.



### 3.3 Limitations

This evaluation was limited by several factors.

First, the evaluation does not capture actual lobbying *activity* in particular markets or as it relates to specific regulatory initiatives, such as The Codex Alimentarius. Rather, it is a desk-based assessment of companies' policies, management systems and disclosure. It is hoped that these documents translate into day-to-day practice; two indicators in the evaluation specifically looked at whether companies committed to conducting, and then published results of, internal and external audits of their lobbying policies.

Second, the evaluation is based only on publicly available information which, while being a good indicator of the level of transparency companies are providing to stakeholders, does not provide the full picture of a company's approach to lobbying. Companies typically have many internal policies, management systems and other relevant documents (not considered here because the funding available only allowed the research to be based on publicly available material) which taken as a whole would give a more complete picture. The more companies publish such documents, the better able ATNI and other stakeholders are to include them in this and other assessments. Further, while companies' disclosure on this topic is to a large extent voluntary, it may also be influenced – in terms of what can and cannot be published - by the requirements of national regulatory authorities, particularly those in which the company is headquartered.

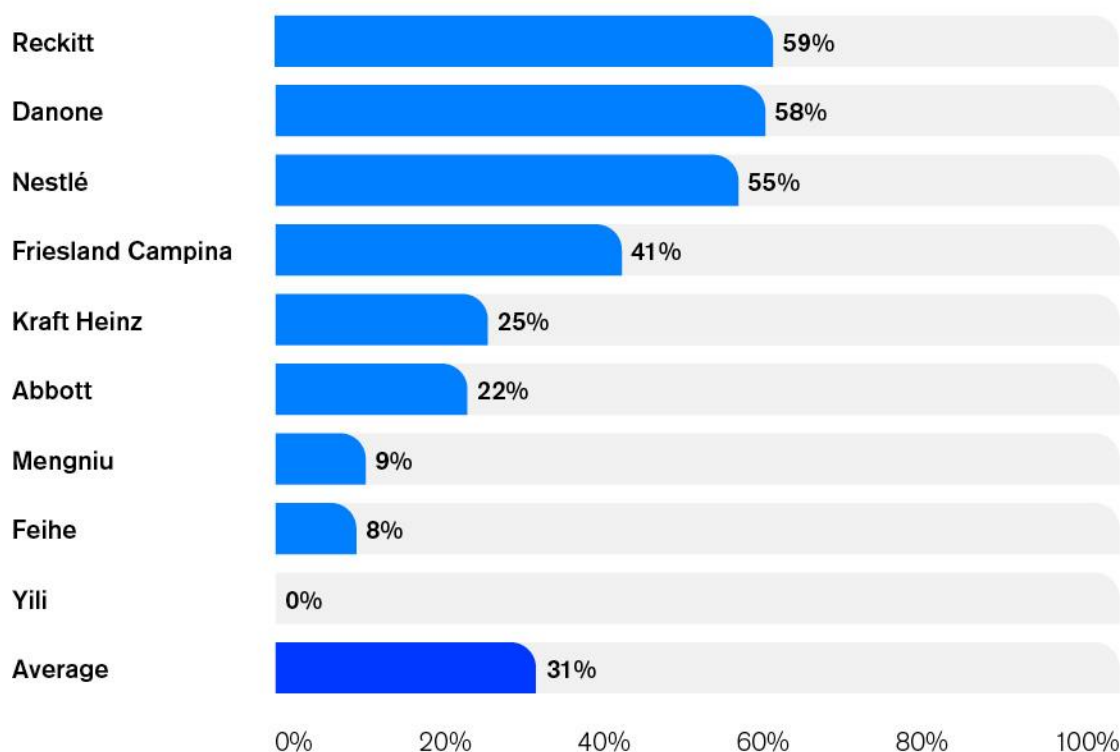
Third, resource constraints meant that the evaluation covers only around 54% of the market share of the sector. Should funding be available ATNI could increase the scope of similar evaluations in future to the 15 or 20 largest companies in the sector, for example.

Finally, responsible lobbying is an emerging topic. Stakeholders' views of good practice will develop and be further refined over time. While the creators of the RLF aimed to combine all relevant sources into one comprehensive evaluation framework – they considered 27 sources from international institutions, NGOs and third-sector organizations, and academia, and eventually used 14 in drafting the framework – this does not mean it provides the full picture. We hope that the RLF and this report will generate further debate, thought leadership and action on responsible lobbying.



## 4. Results

Figure 4: Final weighted scores



Note: the percentage scores are derived by dividing each company's points total by the maximum available points, with application of the following weightings: 40% (Policy Commitments); 20% (Management Systems); 40% (Disclosure); see the Annex on page 21 for more information.

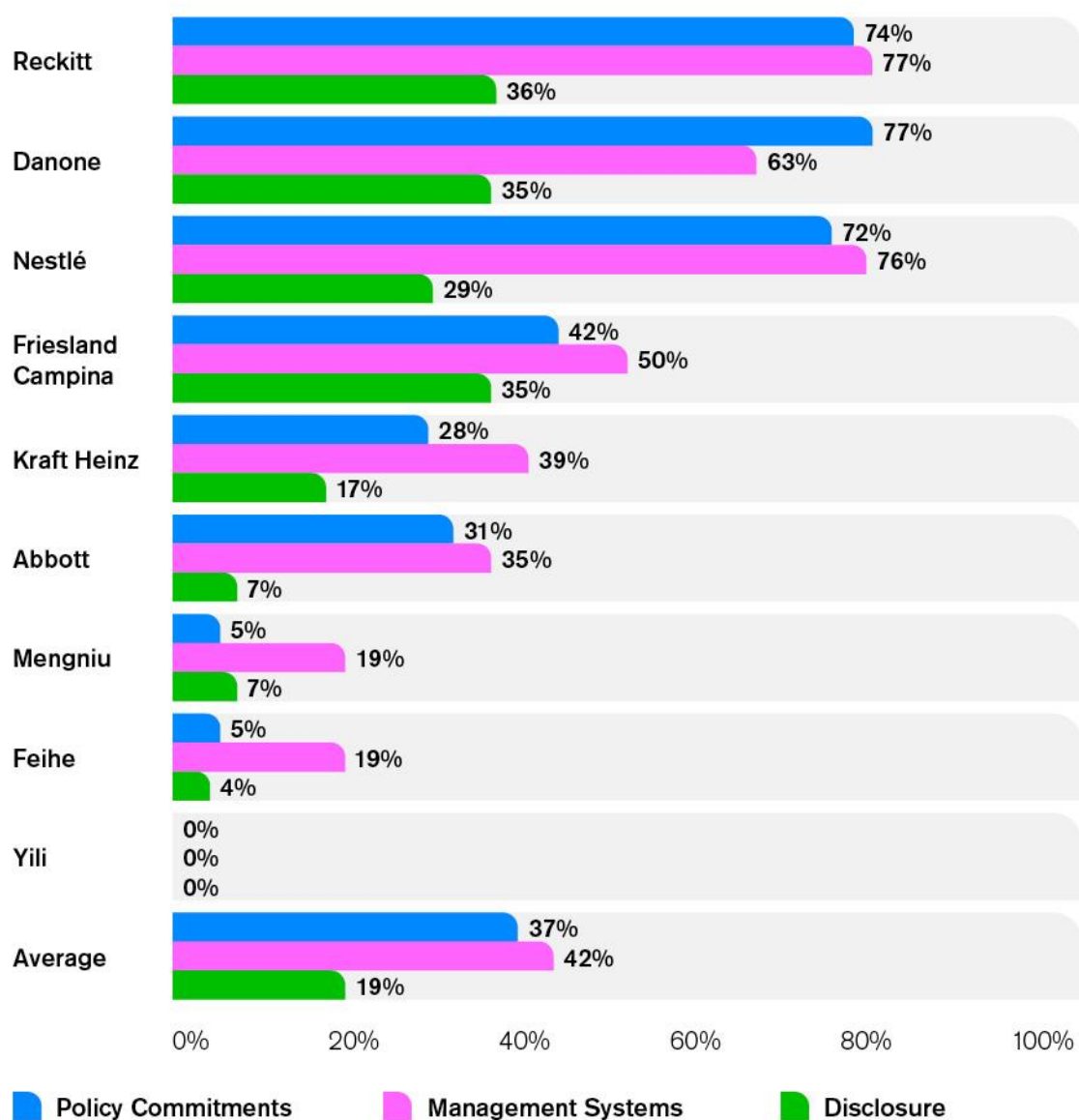
The results set out in Figure 4 show that the companies fall broadly into four groups. The leading group of three companies – Reckitt, Danone, and Nestlé – received a final weighted score of over 50%, which indicates they are over halfway towards full compliance with the RLF. FrieslandCampina falls in the second group, with over one-third of the total achievable points. KraftHeinz, Abbott, Mengniu and Feihe make up the third group, all scoring 25% or less, and Yili didn't score because no relevant information could be found in the public domain on which to base the evaluation. While these companies score in some areas, they fall well short of fully implementing the RLF.

None of the companies yet meet in full the RLF's standards. The average score is 31%. This is not a surprise; as the RLF encompasses the 'gold standard' in relation to lobbying, it was not expected that any company would be fully compliant initially. It is hoped that companies will use it as a roadmap to work towards best practice as soon as possible.

Detailed company scorecards are in Annex 2.



Figure 5: Total scores per category







## 4.1 Analysis by category

### 4.1.1 Policy commitments

Danone, Reckitt and Nestlé have the most comprehensive policies, as illustrated by their scores of over 70% (as shown in Figure 5). There is then a significant gap between these companies' policies and those of the other five companies that have policies. Yili does not appear to have such policies available in the public domain. The average score on policy commitments was 37%.

Boxes 2 and 3 illustrate best practices found on selected aspects of responsible lobbying policies.

#### Box 2: Best practice on revolving door (indicator 7)

Reckitt acknowledges the inherent risks relating to potential conflict of interest (COI) which arise from the 'revolving door' in its [Global Advocacy Policy](#). A six-month cooling off period is observed in the event that Reckitt employs an individual from public office. All Reckitt employees and contractors annually complete and certify compliance with a specific module focused on COI, including Reckitt's specific revolving door provisions, as part of Compliance Passport training.

#### Box 3: Best practice on working with others in pursuit of the public interest (indicator 10)

Danone states in its [Advocacy Policy](#) that the purpose of its advocacy is "to build common ground and action with stakeholders" and commits to build multi-stakeholder coalitions. It "works across the industry, governments and civil society to promote and support higher transparency and accountability standards around advocacy" (p.4). In addition, its [Integrity Policy](#) states "we endeavor to work in partnership with governments, trade associations, consumers and other stakeholders on the development of legislative regulations, policies and procedures and related programs that balance continued innovation and development while improving outcomes for consumers" (p.13). Together, these show a clear commitment to multi-stakeholder cooperation in pursuit of the public interest.

### 4.1.2 Management systems

Companies generally achieved the highest scores overall on management systems (except for the two highest-scoring companies, Reckitt and Danone), for which the average score was 41% (see Figure 4).

The indicators for management systems tend to cover generic corporate practice rather than responsible lobbying alone, and companies may have benefitted from having these systems in place for other reasons. Examples are indicators 12, 13 and 14 (systems to implement commitments on COI, revolving door, anti-bribery and corruption, and political donations), and indicator 18 (whistleblowing mechanisms). In contrast, many of the policy commitments are specific to responsible lobbying, such as indicator 1 (considering the public interest when setting lobbying positions), 2 (evidence-based approach to lobbying), 9 (committing not to crowd out other interests) and 10 (cooperating with other stakeholders to lobby on public interest issues).



Box 4 illustrates best practice in relation to management of anti-bribery and corruption within Reckitt.

#### **Box 4: Best practice on management systems on anti-bribery and corruption (indicator 13)**

Reckitt's [Anti-Bribery Policy](#) outlines the management systems in place to address anti-bribery and corruption. These include the disciplinary action that will result from violations of the policy, directs employees to a specific legal/compliance officer for any questions, clearly applies the policy requirements to contractors as well as its own employees (and where responsibility lies for ensuring contractors are aware of the policy), sets requirements for the documentation of all hospitality and gifts, and lists red flags which employees are to escalate to managers and legal/compliance.

### **4.1.3 Disclosure**

Disclosure scores were lower than the scores in the other two categories for all companies (as shown in Figure 4). The top score on disclosure, achieved by Reckitt, was 36%. There are a couple of reasons for this. Firstly, the principal mechanism for disclosure tends to be transparency registers (see Box 5) where regulatory requirements exist (typically requiring the disclosure of lobbying activities, membership of third-party organizations that lobby, and related funding and expenditure).

#### **Box 5: Transparency registers**

The evaluated companies operate within three jurisdictions that have transparency registers. Lobbyists are required to report to these registers for access to high-level officials and to premises in the jurisdictions where they apply:

- The [EU Transparency Register](#)
- The United States Lobbying Disclosure Act database for the [U.S. House of Representatives](#) and [U.S. Senate](#)
- The [High Authority for Transparency in Public Life](#) (France)

This leads to only partial disclosure, limited to those territories where registers apply, which in turn attracts lower multipliers applied to these indicators (22, 23, 25, 27) to represent how fully the disclosure reflects a company's lobbying activities. This is explained further in the recommendations and conclusions section of this report.

Secondly, some companies disclosed public interest cases for their lobbying positions (indicator 20), examples of implementing commitments in respect to lobbying in the public interest (indicator 28) and on their approach to lobbying (indicator 29), and external stakeholder involvement in lobbying (indicator 33), but very few of these were related to BMS. As this evaluation is of BMS manufacturers specifically, we only considered specific BMS-related examples, taking this as a recognition of the strategic importance of BMS as a topic.

Boxes 6, 7, 8 and 9 provide examples of best practice found on selected disclosure indicators.

**Box 6: Best practice on disclosing memberships (indicator 23)**

Danone discloses an exhaustive list of trade association, multi-stakeholder coalition and business platform memberships (international), and a list of the most relevant ones in terms of influence and fees (regional/local) in its [Advocacy Policy](#). It also notes all organizations where Danone holds a Board seat.

**Box 7: Best practice on disclosing the nature of lobbying (indicator 22) and external stakeholder involvement (indicator 33)**

FrieslandCampina reports on its contact with stakeholders in its [Annual Report](#). This includes a list of stakeholders, grouped by category (NGOs and interest groups; trade and industrial associations; science; employees; government bodies and local authorities; suppliers; and nutrition and health experts). Spread over ten pages, this list provides an overview of the topics of discussion and outcomes for each stakeholder FrieslandCampina maintained contact in the year. This was one of the only – and most comprehensive – examples of global completeness.

**Box 8: Best practice on disclosing funding and spending (indicator 25)**

Reckitt discloses its spending on direct lobbying and third-party organization memberships (e.g., trade associations) through the various transparency registries that apply to it. On top of this, Reckitt [discloses](#) exact spend figures on all trade associations it is a member of globally. Reckitt does not make any political donations and the statement to this effect in its [Annual Report 2019](#) is included with annual assurance processes.

**Box 9: Best practice on disclosing information on the functioning of whistleblowing mechanisms (indicator 31)**

Nestlé publishes detailed information on the annual functioning of its whistleblowing mechanisms on its [website](#). This includes the number of cases raised; number and percentage of cases resolved; breakdown by case category; and information on resolution including the number of employees leaving the company, number of written warnings, and number of suppliers of which the services were terminated.



## 5. Recommendations and conclusions

The steps companies can take to improve their lobbying practices are clear. In most cases, they can find inspiration among their peers included in this evaluation, given that at least one company scored on nearly all indicators. And in relation to managing consistency with trade associations, they can look at emerging practice in other sectors, as illustrated by the example of the oil and gas sector provided in Box 11.

Most of the companies assessed have demonstrated their awareness of this increasingly important issue. Some are over half way to operationalizing the principles and achieving the standards set out in the RLF, while others have made a solid start. And, with various companies recently updating their responsible lobbying policies and disclosure, we hope we will continue to see improvement on this issue, which is so important to improving the health and wellbeing of mothers and babies around the world.

This evaluation has revealed several findings, some encouraging and some that indicate there is substantial room for improvement.

### Areas of good practice

**Three companies already score over 50%:** First, the emergence of some good responsible lobbying policies and practice. Three companies received a final weighted score of over 50%, performing fairly strongly on a majority of indicators, particularly in the policy commitments and management systems categories. They provide good examples of comprehensive policies and systems at the group level to manage lobbying.

**Companies can find examples of good practice to emulate within the sector:** Second, there were only three indicators on which no company scored any points because they do not publish any relevant information with regard to the topics covered by these indicators (listed in Box 10). This means that there is at least one example of good practice for the vast majority of indicators – 30 out of 33 – from within the BMS manufacturing sector. Moreover, on 25 out of 33 indicators, at least one company scored 7.5 points out of 10 or higher. The fact that there are such real-world examples from within the sector will make improvement more tangible and achievable for other companies that wish to strengthen their approaches to, and management of, lobbying. Put simply, if every company adopted the best practice from within its peer group, the sector as a whole would make rapid progress.

#### Box 10: Indicators on which no company scored points

- 9: Policy commitments on not crowding out other stakeholders.
- 24: Alignment of lobbying principles and practice with trade associations/industry groups.
- 30: Publishing results of internal and/or external audit reports of policy compliance.

**Evidence that this issue is on companies' agendas:** Third, the research uncovered many recent improvements – especially in terms of strengthened policies, and increased and improved disclosure – suggesting that this issue is on several companies' agendas and they are already taking steps to improve their approaches to it. We also know from our experience in researching and publishing ATNI Indexes that companies typically have additional policies, management systems and data not in the public domain. Making more of this relevant information publicly available would be a relatively easy way for companies to improve their performance against the RLF.



## Areas for improvement

The area with ample scope for improvement is disclosure. The reasons why no company scored more than roughly one-third of the points in this category are three-fold.

**A more complete picture of lobbying is needed:** First, most companies disclose only via transparency registers where they are mandated by regulation. This does not provide a complete picture of a company's lobbying activities. Indeed, many of the jurisdictions with no legal measures or only some provisions of The Code included in national legislation (see page 8) do not have a transparency register. Therefore, we recommend that companies broaden their disclosure to fully cover all their global operations, at least disclosing lobbying at a programmatic or divisional level, with assurance or other evidence to demonstrate completeness. We are starting to see examples of companies doing this for some indicators, such as memberships (see Box 6 on page 18), which is an encouraging trend.

**More real-world examples would improve understanding:** Second, few practical and worked examples of good practice are yet available. The 'show don't tell' principle sits at the heart of the RLF; showing how policies and systems work in practice by providing worked examples and data gives external stakeholders much more confidence that those commitments are being met and that internal systems are working. An example is Nestlé's disclosure on its whistleblowing mechanism highlighted previously, but there is ample scope for improvement across the board.

**BMS-specific disclosure is missing:** Third, companies' disclosure is often not BMS-specific. Various indicators in the disclosure section look at how policy commitments are implemented, such as cooperation with NGOs, advocacy for specific mechanisms, or external stakeholder involvement in setting the lobbying approach and positions. Because this is a BMS-specific evaluation, examples were only considered that were BMS-related. While we found a good number of generic examples, few were BMS-specific. We encourage companies to report on examples of BMS-focused lobbying to demonstrate that they understand that this is a priority issue.

### Box 11: An example from the oil and gas sector

The RLF aims to ensure consistency between companies' own lobbying and that of the trade associations and other industry groups of which they are a member. This was one of the very few indicators on which no company scored any points. However, there are examples outside the BMS sector that are instructive which this sector could emulate.

The oil and gas sector, for example, has made big strides in recent years. The institutional investor community has been driving progress via the [Investor expectations on corporate climate lobbying](#),<sup>32</sup> developed by the UN Principles for Responsible Investment (PRI) and Institutional Investor Group on Climate Change (IIGCC). According to the PRI's *Converging on Climate Lobbying* report, the expectations had been signed by 74 investors with more than \$4.5 trillion in assets under management at launch in 2019. The expectations state (p.2) that:

*"We believe that companies should be consistent in their policy engagement in all geographic regions and that they should ensure any engagement conducted on their behalf or with their support is aligned with our interest in a safe climate, in turn protecting the long-term value in our portfolios across all sectors and asset classes."*

Various companies, including Royal Dutch Shell (2019 review; [2020 update](#)),<sup>33</sup> BP,<sup>34</sup> and Total<sup>35</sup> (p. 49-52) have since issued reviews of their participation in industry associations on climate change. These reviews include summaries of the core tenets of the company's own climate policy positions; principles by which the company will govern its relations with industry associations, including how it will engage when misalignment is found and what will inform a decision to leave the association; and a review of their



most material memberships. Critically, all three companies have left industry associations following their reviews and identified various others with whom they will engage to address 'partial alignment'.



## 6. Next steps

ATNI encourages all of the companies assessed to review the findings set out in this report and to identify and communicate the steps they will take to improve their policies, management systems and disclosure. It is hoped that other stakeholders, such as investors, CSOs, policymakers and industry associations will be able to utilize the ideas and the results in their work.

ATNI hopes to be able to publish similar lobbying-focused reports in the future that enable stakeholders to track these companies' improvements in policy, practice and disclosure over time. Moreover, ATNI hopes to be able to expand the coverage of companies evaluated. There is also the potential to incorporate the scores from these separate assessments into companies' scores in future ATNI's Indexes that cover this sector.





# Annex 1

This annex provides further detail on each company's results.

Further detail is provided on which categories each company performed particularly well in and on which it did not. Summaries are provided for each company's main areas of strength and key priorities for improvement.

Each page shows two key graphs: the company's total score per category and final weighted score. The total score per category is calculated by taking the total sum of points scored in that category and dividing it by the maximum number of achievable points. The final weighted score is calculated by summing the total score per category and applying the following weights: 40% (policy commitments) + 20% (management systems) + 40% (disclosure). So, if a company scored 50% on policy commitments, 75% on management systems and 40% on disclosure, its final weighted score would be calculated as follows:

$$(0.4 * 50) + (0.2 * 75) + (0.4 * 40) = 51\%$$

Equal and relatively large weights (40%) are given to policy commitments and disclosure, as these two elements of corporate practice are considered the most critical in delivering responsible lobbying. Management systems (20%) are the link in between policy and disclosure. They are essential in implementing the policy, but the policy is primary; if they are not in place, it is unlikely there will be a great deal of disclosure of actual practice and companies will be suitably penalized by failing to score on this element.

Note that the total scores per category shown in the graphs have been rounded to the nearest percentage. Therefore, manual calculations of the final weighted scores based on those graphs might return a figure that is higher or lower than the reported score. The reported score *is* correct, however; it has been calculated based on the primary data which was not rounded up or down.

The number of points awarded for each indicator is shown on the right of each page. Each score is color-coded to make it easy to see where a company did well and where it did not; scores are highlighted green if over 7.5 points were scored; orange if under 2.5 points were scored; and yellow for anything in between. The maximum achievable score is also noted for each indicator. Finally, the sum of maximum achievable points and of points achieved are also noted for each category.

Three separate approaches were taken to scoring, depending on which best fit the type of practice being assessed by the indicator:

1. Several levels, with 10 points being awarded for full compliance with the principle, and one or two further levels of points for partial compliance.  
Example:

Indicator 1: Consideration of public interest	The company's policy includes:	Possible points
	<b>A clear statement in lobbying policy that the purpose of all lobbying is to support the public interest as well as to meet the company's objectives.</b>	<b>10</b>
	<b>Some recognition of the need for lobbying to serve the public interest.</b>	<b>5</b>
	<b>No such statement.</b>	<b>0</b>





2. Points awarded for two separate elements, e.g., five points awarded if element A is complied with and/or five points awarded if element B is complied with.  
Example:

Indicator 7: Revolving door	The company's policy includes:	Possible points
	Recognition of, and an approach to managing, the issue of the 'revolving door', covering the hiring of former politicians and public officials, and secondments or placement of staff into the public sectors.	5
	Policy includes specific provisions relating to evaluation mechanisms, controls and cooling off periods.	5
	No statements on these issues.	0

3. Where there are various frameworks that a company could align its policies to, and in order not to be prescriptive, the company achieve 10 points by referencing different combinations of these.  
Example:

Indicator 21: Respect for public policy frameworks and relevant laws, standards, codes	The company's policy includes:	Possible points
	International Code of Marketing of Breast-milk Substitutes, and subsequent World Health Assembly resolutions making significant additions or clarifications to the original Code.	5
	WHO Framework of Engagement with Non-State Actors.	5
	OECD Principles for Transparency and Integrity in Lobbying.	2.5
	Transparency International Standards for Lobbying Regulation.	2.5
	Industry initiatives, such as the IFBA Guiding Principles for Stakeholder Engagement.	2.5
	The Responsible Lobbying Framework.	2.5

4. Mix of two of the above, for example a combination of method (1) and (2).  
Example:

Indicator 3: Respect for public policy frameworks and relevant laws, standards, codes	The company's policy includes:	Possible points
	Commitment not to undermine existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code.	5
	Commitment to support existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code.	2.5
	Commitment to uphold national laws, standards and any national codes of conduct for lobbyists, and to report any illegal or unethical activity to the relevant legal or oversight authorities.	5
	No commitment.	0



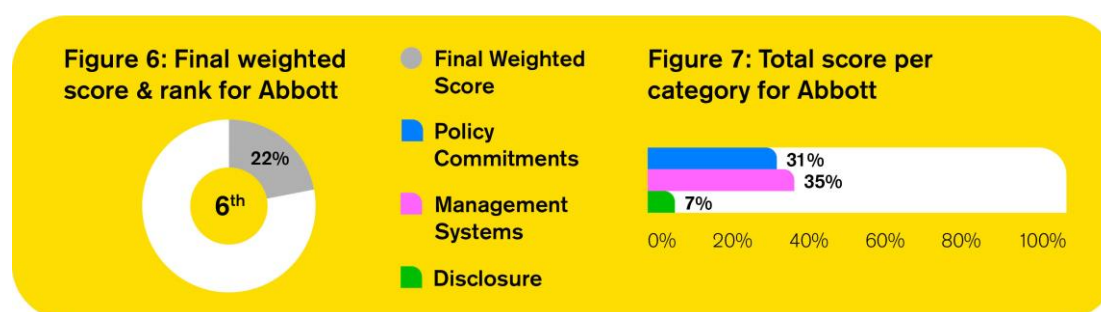
## Annex 2: Company Scorecards

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# Abbott

**Abbott scored 22% and ranked sixth** (see Figure 6). Abbott's performance is strongest in the management systems category (see Figure 7). Abbott also scored points on various elements of the policy commitments category. Its disclosure is particularly poor. Refer to Table 4 for an overview of the scores achieved by Abbott per indicator within each category. Note that all scores are based on published information only.



Abbott's **main areas of strength** are:

- Its COI policy, which is comprehensive and clearly covers lobbying activities.
- Its whistleblowing mechanism, which is operated by a third-party and allows for anonymous complaints.

Abbott's **key areas for improvement** are:

- Committing to an evidence-based approach to lobbying.
- Committing to disclose any political donations made in all markets.
- Recognizing the risks related to the revolving door and setting out its approach for managing them.
- Committing to safeguard other interest groups' opportunity to lobby and to not spend disproportionately.
- Publicly describing its processes for reviewing the lobbying positions of organizations it is a member of, managing those relationships and addressing any misalignment.
- Publicly describing its controls over lobbyists, including training, monitoring and sanctioning processes.
- Publicly disclosing a responsible lobbying policy.
- Disclosing the public interest cases for its lobbying positions and its respect for relevant frameworks.
- Broadening disclosure of lobbying activities, memberships, and spending beyond regulatory requirements.
- Publishing examples of its commitments on its lobbying approach and external stakeholder involvement.
- Broadening disclosure of lobbying activities, memberships, and spending beyond regulatory requirements.
- Publishing examples of its commitments on its lobbying approach and external stakeholder involvement.



**Table 4: Score per indicator for Abbott**

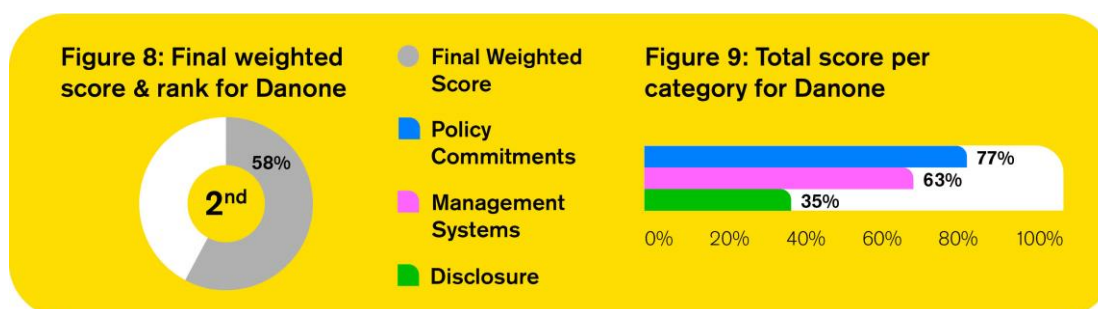
#	Indicator comparison		
Policy commitments		Max score	
1	Consideration of public interest	10	5
2	Evidence-based approach	10	0
3	Respect for public policy frameworks and relevant laws, standards, codes	10	2.5
4	Political donations	10	0
5	Conflicts of interest	10	10
6	Codes of conduct to prevent bribery & corruption	10	5
7	Revolving door	10	0
8	Controls over trade associations and industry policy groups	10	5
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	3.3
<b>Policy commitments - total scores</b>		<b>100</b>	<b>30.8</b>
Management systems		Max score	
11	Accountability and responsibility for policy implementation	10	5
12	Conflicts of interest and revolving door	10	3.3
13	Anti-bribery and corruption	10	5
14	Political donations	10	5
15	Controls over membership of associations/organisations	10	0
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	0
17	Auditing	10	0
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>28.3</b>
Disclosure		Max score	
19	Responsible lobbying policy	10	0
20	Public interest cases for lobbying positions	10	0
21	Respect for public policy frameworks and relevant laws, standards, codes	10	0
22*	Nature of lobbying	20	3.75
23*	Memberships	20	1.875
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	3.75
26	Public policy positions	10	0
27*	Narrative on lobbying activities	20	0
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	0
32	Accessibility and quality of disclosure	10	4
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>13.375</b>

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.



# Danone

**Danone scored 58% and ranked second**, trailing Reckitt by 9.1 points out of a maximum score of 370.<sup>2</sup> Its performance is strongest on policy commitments, where it scored the highest points total. It also scored a significant number of points on management systems. While it only achieved 35% of the available points on disclosure (see Figure 9), this was a tied second-best performance. Refer to Table 5 for an overview of the scores achieved by Danone per indicator within each category. Note that all scores are based on published information only.



Danone's **main areas of strength** are its:

- Clear statement that the purpose of its lobbying is to support the public interest next to its own objectives.
- Robust commitments prohibiting COI and bribery and corruption which clearly link to lobbying.
- Controls over trade associations and other lobbying groups including a commitment to review positions.
- Commitments to work with others in pursuit of the public interest, including towards greater transparency.
- Robust systems to implement its commitments on COI and the revolving door.
- Controls over lobbyists including staff training and processes to investigate and sanction any breaches.
- Disclosure of many public interest cases for its lobbying positions.
- Disclosure of all memberships of lobbying organizations including information on Board seats held.

Danone's **key priorities for improvement** are:

- Committing to safeguard other interest groups' opportunity to lobby and to not spend disproportionately.
- Publicly describing management systems to implement its political donations policy.
- Broadening disclosure to cover the results of reviews of trade association lobbying alignment and actions taken, narrative of lobbying activities, and examples of implementing its commitments.

<sup>2</sup> Sentence updated in September 2021.



**Table 5: Score per indicator for Danone**

#	Indicator comparison		
<b>Policy commitments</b>		<b>Max score</b>	
1	Consideration of public interest	10	10
2	Evidence-based approach	10	5
3	Respect for public policy frameworks and relevant laws, standards, codes	10	7.5
4	Political donations	10	10
5	Conflicts of interest	10	10
6	Codes of conduct to prevent bribery & corruption	10	10
7	Revolving door	10	5
8	Controls over trade associations and industry policy groups	10	10
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	9.9
<b>Policy commitments - total scores</b>		<b>100</b>	<b>77.4</b>
<b>Management systems</b>		<b>Max score</b>	
11	Accountability and responsibility for policy implementation	10	7.5
12	Conflicts of interest and revolving door	10	9.9
13	Anti-bribery and corruption	10	5
14	Political donations	10	0
15	Controls over membership of associations/organisations	10	6.6
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	9.9
17	Auditing	10	1.66
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>50.56</b>
<b>Disclosure</b>		<b>Max score</b>	
19	Responsible lobbying policy	10	10
20	Public interest cases for lobbying positions	10	10
21	Respect for public policy frameworks and relevant laws, standards, codes	10	7.5
22*	Nature of lobbying	20	9
23*	Memberships	20	15
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	5.625
26	Public policy positions	10	2.5
27*	Narrative on lobbying activities	20	0
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	2.5
32	Accessibility and quality of disclosure	10	4
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>66.125</b>

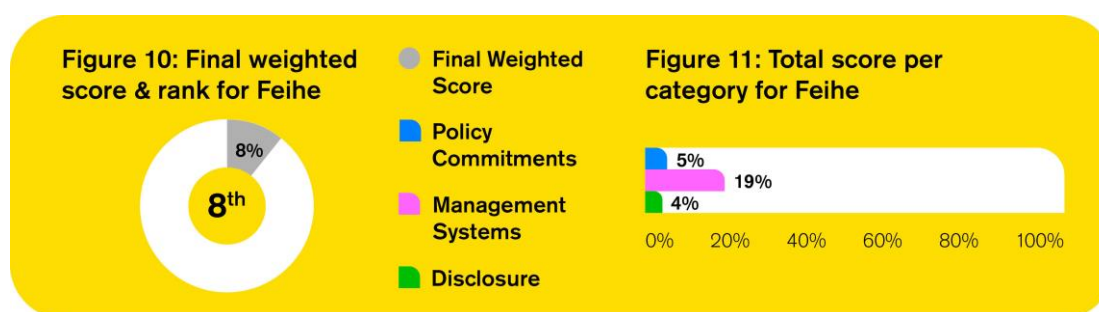
\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.





# Feihe

**Feihe scored 8% and ranked eighth** (see Figure 10). Its performance is strongest on management systems, on which it ties with Mengniu with 19% (see Figure 11). The company scores some points on policy commitments and disclosure but its performance in both categories remains poor (4-5%). We looked for information in both English and Mandarin. Refer to Table 6 for an overview of the scores per indicator within each category. Note that all scores are based on published information only.



Feihe's **main area of strength** is its:

- Whistleblowing system, which allows for anonymous complaints.

Feihe's **key areas for improvement** as a starting point are to:

- Broaden its policy commitments to cover more aspects of lobbying, such as COI and committing to respect public policy frameworks.
- Put in place management systems to ensure policy implementation and monitor compliance.
- Start publicly to disclose the nature of its lobbying activities, and related funding and spending.



**Table 6: Score per indicator for Feihe**

#	Indicator comparison		
Policy commitments		Max score	
1	Consideration of public interest	10	0
2	Evidence-based approach	10	0
3	Respect for public policy frameworks and relevant laws, standards, codes	10	0
4	Political donations	10	0
5	Conflicts of interest	10	0
6	Codes of conduct to prevent bribery & corruption	10	5
7	Revolving door	10	0
8	Controls over trade associations and industry policy groups	10	0
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	0
<b>Policy commitments - total scores</b>		<b>100</b>	<b>5</b>
Management systems		Max score	
11	Accountability and responsibility for policy implementation	10	0
12	Conflicts of interest and revolving door	10	0
13	Anti-bribery and corruption	10	5
14	Political donations	10	0
15	Controls over membership of associations/organisations	10	0
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	0
17	Auditing	10	0
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>15</b>
Disclosure		Max score	
19	Responsible lobbying policy	10	0
20	Public interest cases for lobbying positions	10	0
21	Respect for public policy frameworks and relevant laws, standards, codes	10	0
22*	Nature of lobbying	20	0
23*	Memberships	20	0
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	0
26	Public policy positions	10	0
27*	Narrative on lobbying activities	20	0
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	2.5
30	Auditing	10	0
31	Whistleblowing mechanisms	10	0
32	Accessibility and quality of disclosure	10	6
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>8.5</b>

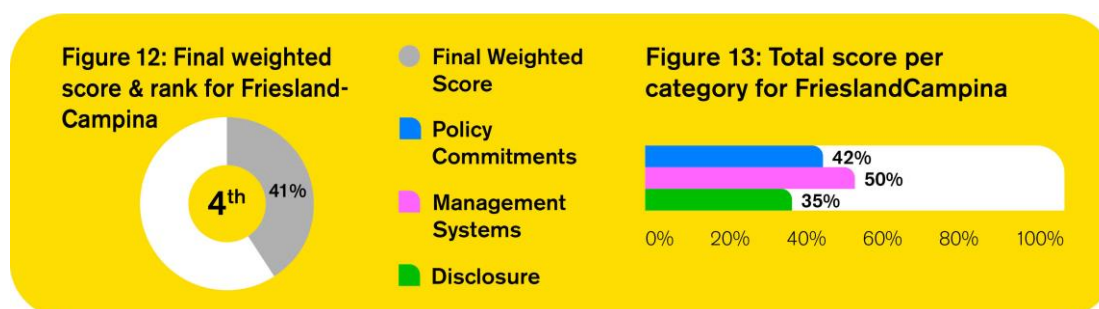
\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.





# FrieslandCampina

**FrieslandCampina scored 41% and ranked fourth** (see Figure 12). Its performance is strongest on management systems (as shown in Figure 13). It also achieved a reasonable number of points on policy commitments. While it is weakest in the area of disclosure, its points total and 35% score is a tied second together with Danone, just behind Reckitt. Refer to Table 7 for an overview of the scores achieved by FrieslandCampina per indicator within each category. Note that all scores are based on published information only.



FrieslandCampina's **main areas of strength** are its:

- Global policy of no political donations.
- Clear policy implementation through Board oversight, delegation, and regular control mechanisms.
- Controls over lobbyists including staff training and processes to investigate and sanction any breaches.
- Global disclosure on lobbying, including types of officials engaged with, topics discussed, and outcomes.
- Detailed disclosure of external stakeholder involvement in lobbying.

FrieslandCampina's **key priorities for improvement** are:

- Committing to consider the public interest and an evidence-based approach to lobbying.
- Recognizing the risks related to the revolving door, and setting out its approach for managing them.
- Committing to safeguard other interest groups' opportunity to lobby and to not spend disproportionately.
- Publicly describing management systems to implement its political donations policy.
- Publicly describing its processes for reviewing the lobbying positions of organizations it is a member of, managing those relationships and addressing any misalignment.
- Publishing public interest cases for its lobbying positions, and its positions on public policy issues.



**Table 7: Score per indicator for FrieslandCampina**

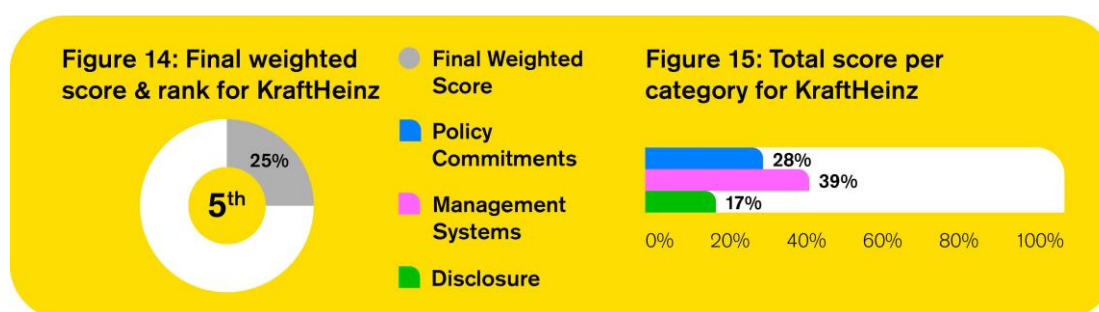
#	Indicator comparison		
<b>Policy commitments</b>		<b>Max score</b>	
1	Consideration of public interest	10	0
2	Evidence-based approach	10	0
3	Respect for public policy frameworks and relevant laws, standards, codes	10	7.5
4	Political donations	10	10
5	Conflicts of interest	10	7.5
6	Codes of conduct to prevent bribery & corruption	10	5
7	Revolving door	10	0
8	Controls over trade associations and industry policy groups	10	5
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	6.6
<b>Policy commitments - total scores</b>		<b>100</b>	<b>41.6</b>
<b>Management systems</b>		<b>Max score</b>	
11	Accountability and responsibility for policy implementation	10	10
12	Conflicts of interest and revolving door	10	3.3
13	Anti-bribery and corruption	10	5
14	Political donations	10	0
15	Controls over membership of associations/organisations	10	0
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	9.9
17	Auditing	10	1.66
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>39.86</b>
<b>Disclosure</b>		<b>Max score</b>	
19	Responsible lobbying policy	10	10
20	Public interest cases for lobbying positions	10	0
21	Respect for public policy frameworks and relevant laws, standards, codes	10	5
22*	Nature of lobbying	20	12.75
23*	Memberships	20	3.75
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	5.625
26	Public policy positions	10	0
27*	Narrative on lobbying activities	20	7.5
28	Examples of implementing commitments in respect of lobbying in the public interest	10	2.5
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	5
32	Accessibility and quality of disclosure	10	4
33	External stakeholder involvement	10	10
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>66.125</b>

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.



# KraftHeinz

**KraftHeinz scored 25% and ranked fifth** (see Figure 14). It is the top scoring US-headquartered company, just ahead of Abbott. Its performance is strongest on management systems as seen in Figure 15. It also scored some points for its policy commitment and a limited number for disclosure. Refer to Table 8 for an overview of the scores achieved by KraftHeinz per indicator within each category. Note that all scores are based on published information only.



KraftHeinz's **main areas of strength** are its:

- Code of conduct to prevent bribery and corruption which clearly relates to interactions with government officials and includes intermediaries.
- Whistleblowing mechanism, which is operated by a third-party and allows for anonymous complaints.
- Disclosure of all political contributions and membership of all trade associations with dues of >\$50,000 p.a.

KraftHeinz's **key priorities for improvement** are:

- Committing to consider the public interest and an evidence-based approach to lobbying.
- Recognizing the risks related to the revolving door and setting out its approach for managing them.
- Committing to review the lobbying positions of its industry groups and place controls on its lobbyists.
- Committing to cooperate with others in the pursuit of the public interest, including for greater transparency.
- Publicly describing its processes for reviewing the lobbying positions of organizations it is a member of, managing those relationships and addressing any misalignment.
- Publicly describing its controls over lobbyists, including training, monitoring and sanctioning processes.
- Disclosing the public interest cases for its lobbying positions and its respect for relevant frameworks.
- Broadening disclosure of lobbying activities, memberships, and spending beyond regulatory requirements.
- Publishing examples of its commitments on its lobbying approach and external stakeholder involvement.



**Table 8: Score per indicator for KraftHeinz**

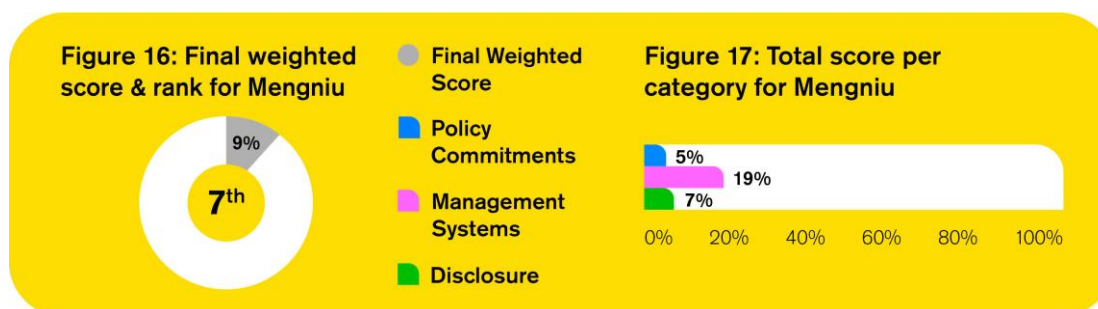
#	Indicator comparison		
<b>Policy commitments</b>		<b>Max score</b>	
1	Consideration of public interest	10	0
2	Evidence-based approach	10	0
3	Respect for public policy frameworks and relevant laws, standards, codes	10	5
4	Political donations	10	5
5	Conflicts of interest	10	7.5
6	Codes of conduct to prevent bribery & corruption	10	10
7	Revolving door	10	0
8	Controls over trade associations and industry policy groups	10	0
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	0
<b>Policy commitments - total scores</b>		<b>100</b>	<b>27.5</b>
<b>Management systems</b>		<b>Max score</b>	
11	Accountability and responsibility for policy implementation	10	7.5
12	Conflicts of interest and revolving door	10	3.3
13	Anti-bribery and corruption	10	5
14	Political donations	10	5
15	Controls over membership of associations/organisations	10	0
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	0
17	Auditing	10	0
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>30.8</b>
<b>Disclosure</b>		<b>Max score</b>	
19	Responsible lobbying policy	10	10
20	Public interest cases for lobbying positions	10	0
21	Respect for public policy frameworks and relevant laws, standards, codes	10	0
22*	Nature of lobbying	20	7.5
23*	Memberships	20	2.5
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	8.125
26	Public policy positions	10	0
27*	Narrative on lobbying activities	20	0
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	0
32	Accessibility and quality of disclosure	10	4
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>32.125</b>

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.



# Mengniu

**Mengniu scored 9% and ranked seventh** (see Figure 16). Its performance is strongest on management systems (as shown in Figure 17). It also scored a limited number of points on policy commitments. Its disclosure is poor. We looked for information in both English and Mandarin. Refer to Table 9 for an overview of the scores achieved by Mengniu per indicator within each category. Note that all scores are based on published information only.



Mengniu's **main areas of strength** are its:

- Policy of making no political donations.
- Whistleblowing system which allows for anonymous complaints.

Despite scoring a few points across all three categories, Mengniu has many **areas for improvement**. To start, it could:

- Broaden its policy commitments to cover more aspects of lobbying, such as COI and committing to respect public policy frameworks.
- Put in place management systems to ensure policy implementation and monitor compliance with its political donations policy.
- Start publicly disclosing the nature of its lobbying activities, and related funding and spending.





**Table 9: Score per indicator for Mengniu**

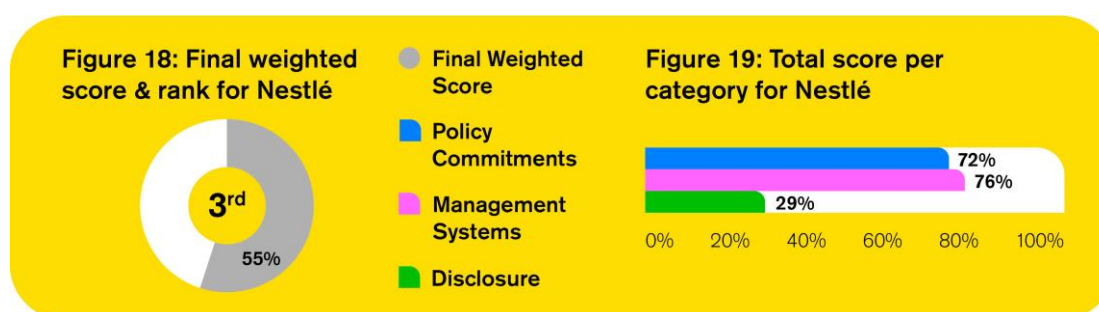
#	Indicator comparison		
Policy commitments		Max score	
1	Consideration of public interest	10	0
2	Evidence-based approach	10	0
3	Respect for public policy frameworks and relevant laws, standards, codes	10	0
4	Political donations	10	0
5	Conflicts of interest	10	0
6	Codes of conduct to prevent bribery & corruption	10	5
7	Revolving door	10	0
8	Controls over trade associations and industry policy groups	10	0
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	0
<b>Policy commitments - total scores</b>		<b>100</b>	<b>5</b>
Management systems		Max score	
11	Accountability and responsibility for policy implementation	10	0
12	Conflicts of interest and revolving door	10	0
13	Anti-bribery and corruption	10	5
14	Political donations	10	0
15	Controls over membership of associations/organisations	10	0
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	0
17	Auditing	10	0
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>15</b>
Disclosure		Max score	
19	Responsible lobbying policy	10	0
20	Public interest cases for lobbying positions	10	0
21	Respect for public policy frameworks and relevant laws, standards, codes	10	5
22*	Nature of lobbying	20	0
23*	Memberships	20	0
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	0
26	Public policy positions	10	0
27*	Narrative on lobbying activities	20	0
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	2.5
32	Accessibility and quality of disclosure	10	6
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>13.5</b>

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.



# Nestlé

**Nestlé scored 55% and ranked third** (see Figure 18). Its performance is strongest on management systems as shown in Figure 19, where it scored the highest of all evaluated companies. It also performed strongly for its policy commitments. Its weakest area is disclosure, where it scored 7% below the top performer, Reckitt. Refer to Table 10 for an overview of the scores achieved by Nestlé per indicator within each category. Note that all scores are based on published information only.



Nestlé's **main areas of strength** are its:

- Clear statement that the purpose of its lobbying is to support the public interest next to its own objectives.
- Evidence-based approach to lobbying rooted in peer-reviewed, independent science.
- Robust commitments on anti-bribery and corruption which clearly link to lobbying and apply to intermediaries.
- Controls over trade associations and other lobbying groups including a commitment to review positions.
- Robust systems to implement commitments on COI, anti-bribery and corruption and donations.
- Public support for The Code, industry initiatives and the RLF.
- Detailed, quantitative disclosure on the use and functioning of its whistleblowing mechanism.

Nestlé's **key priorities for improvement** are:

- Committing to safeguard other interest groups' opportunity to lobby and to not spend disproportionately.
- Commissioning external audits of public disclosure, lobbying activities and controls, and publishing results.
- Publishing its positions on public policy issues and public interest cases for those positions.
- Publishing the results of reviews of trade association lobbying alignment and any remedial actions taken.
- Publishing BMS-related examples of implementing its policy commitments on lobbying.
- Publishing BMS-related examples of how external stakeholders have been involved in lobbying.





**Table 10: Score per indicator for Nestlé**

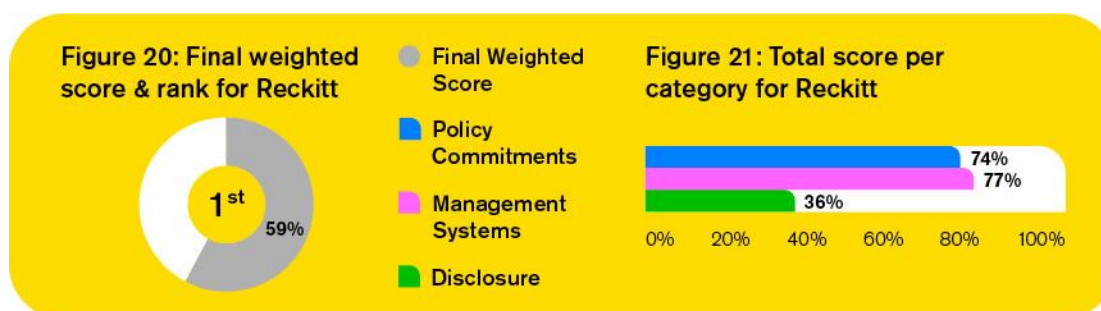
#	Indicator comparison		
<b>Policy commitments</b>		<b>Max score</b>	
1	Consideration of public interest	10	10
2	Evidence-based approach	10	10
3	Respect for public policy frameworks and relevant laws, standards, codes	10	7.5
4	Political donations	10	5
5	Conflicts of interest	10	7.5
6	Codes of conduct to prevent bribery & corruption	10	10
7	Revolving door	10	5
8	Controls over trade associations and industry policy groups	10	10
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	6.6
<b>Policy commitments - total scores</b>		<b>100</b>	<b>71.6</b>
<b>Management systems</b>		<b>Max score</b>	
11	Accountability and responsibility for policy implementation	10	7.5
12	Conflicts of interest and revolving door	10	9.9
13	Anti-bribery and corruption	10	10
14	Political donations	10	10
15	Controls over membership of associations/organisations	10	6.6
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	6.6
17	Auditing	10	0
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>60.6</b>
<b>Disclosure</b>		<b>Max score</b>	
19	Responsible lobbying policy	10	10
20	Public interest cases for lobbying positions	10	0
21	Respect for public policy frameworks and relevant laws, standards, codes	10	10
22*	Nature of lobbying	20	7.5
23*	Memberships	20	2.5
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	5.625
26	Public policy positions	10	0
27*	Narrative on lobbying activities	20	3.75
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	10
32	Accessibility and quality of disclosure	10	6
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>55.375</b>

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.



# Reckitt

**Reckitt scored 59% and ranked first** (see Figure 20), just beating Danone by 9.1 points out of a maximum score of 370. Its performance is strongest on policy commitments, closely followed by management systems as shown in Figure 21. While disclosure was Reckitt's weakest area, its score of 36% is the highest among all evaluated companies. Reckitt came a close second on both policy commitments and management systems. Refer to Table 11 for an overview of the scores achieved by Reckitt per indicator within each category. Note that all scores are based on published information only.



Reckitt's **main areas of strength** are its:

- Robust policy commitments on COI and anti-bribery and corruption.
- Recognition of the risks related to the revolving door and specific provisions to manage this.
- Controls over trade associations and other lobbying groups including a commitment to review positions.
- Management systems to implement its commitments, including tracking and monitoring and staff training.
- Disclosure of many public interest cases for its lobbying positions.
- Detailed disclosure on the nature of its lobbying, including global disclosure of its lobbying priorities.
- Comprehensive disclosure of memberships of lobbying organizations and related funding and spending.

Reckitt's **key priorities for improvement** are:

- Committing to safeguard other interest groups' opportunity to lobby and to not spend disproportionately.
- Publicly describing in more detail its processes for reviewing the lobbying positions of organizations it is a member of, managing those relationships and addressing any misalignment.
- Commissioning external audits of public disclosure, lobbying activities and controls, and publishing results.
- Disclosing the systems to conduct, and results of, reviews of its trade associations' lobbying positions.
- Publishing a narrative on its lobbying activities and examples of implementing its various policy commitments.



**Table 11: Score per indicator for Reckitt**

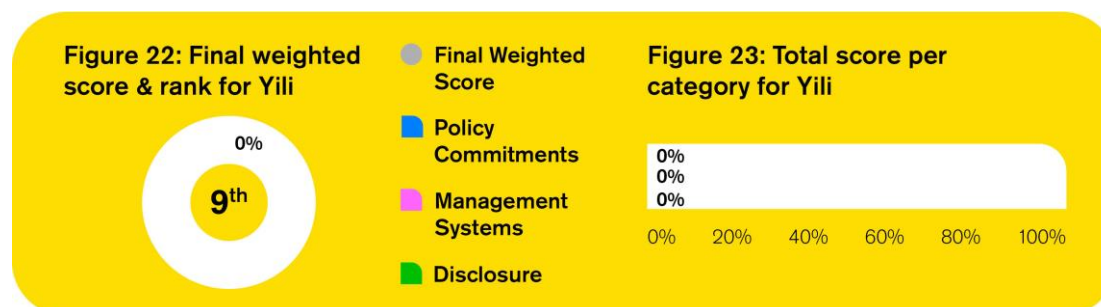
#	Indicator comparison		
<b>Policy commitments</b>		<b>Max score</b>	
1	Consideration of public interest	10	5
2	Evidence-based approach	10	5
3	Respect for public policy frameworks and relevant laws, standards, codes	10	7.5
4	Political donations	10	10
5	Conflicts of interest	10	10
6	Codes of conduct to prevent bribery & corruption	10	10
7	Revolving door	10	10
8	Controls over trade associations and industry policy groups	10	10
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	6.6
<b>Policy commitments - total scores</b>		<b>100</b>	<b>74.1</b>
<b>Management systems</b>		<b>Max score</b>	
11	Accountability and responsibility for policy implementation	10	10
12	Conflicts of interest and revolving door	10	6.6
13	Anti-bribery and corruption	10	10
14	Political donations	10	10
15	Controls over membership of associations/organisations	10	3.3
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	9.9
17	Auditing	10	1.66
18	Whistleblowing mechanisms	10	10
<b>Management systems - total scores</b>		<b>80</b>	<b>61.46</b>
<b>Disclosure</b>		<b>Max score</b>	
19	Responsible lobbying policy	10	10
20	Public interest cases for lobbying positions	10	10
21	Respect for public policy frameworks and relevant laws, standards, codes	10	5
22*	Nature of lobbying	20	9
23*	Memberships	20	7.5
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	10.625
26	Public policy positions	10	2.5
27*	Narrative on lobbying activities	20	0
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	5
32	Accessibility and quality of disclosure	10	8
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>67.625</b>

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.



Yili

**Yili scored 0% and ranked ninth.** No public information relating to Yili's lobbying practices, management systems, and disclosure was found. We looked for information in both English and Mandarin. Refer to Figures 22 and 23, and Table 12. Note that all companies' scores are based on published information only.





**Table 12: Score per indicator for Yili**

#	Indicator comparison		
Policy commitments		Max score	
1	Consideration of public interest	10	0
2	Evidence-based approach	10	0
3	Respect for public policy frameworks and relevant laws, standards, codes	10	0
4	Political donations	10	0
5	Conflicts of interest	10	0
6	Codes of conduct to prevent bribery & corruption	10	0
7	Revolving door	10	0
8	Controls over trade associations and industry policy groups	10	0
9	Crowding out	10	0
10	Working with others in pursuit of the public interest	10	0
<b>Policy commitments - total scores</b>		<b>100</b>	<b>0</b>
Management systems		Max score	
11	Accountability and responsibility for policy implementation	10	0
12	Conflicts of interest and revolving door	10	0
13	Anti-bribery and corruption	10	0
14	Political donations	10	0
15	Controls over membership of associations/organisations	10	0
16	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10	0
17	Auditing	10	0
18	Whistleblowing mechanisms	10	0
<b>Management systems - total scores</b>		<b>80</b>	<b>0</b>
Disclosure		Max score	
19	Responsible lobbying policy	10	0
20	Public interest cases for lobbying positions	10	0
21	Respect for public policy frameworks and relevant laws, standards, codes	10	0
22*	Nature of lobbying	20	0
23*	Memberships	20	0
24	Alignment of lobbying principles and practice	10	0
25*	Funding and spending	20	0
26	Public policy positions	10	0
27*	Narrative on lobbying activities	20	0
28	Examples of implementing commitments in respect of lobbying in the public interest	10	0
29	Examples of implementing commitments on the approach to lobbying	10	0
30	Auditing	10	0
31	Whistleblowing mechanisms	10	0
32	Accessibility and quality of disclosure	10	0
33	External stakeholder involvement	10	0
<b>Disclosure - total scores (/190)</b>		<b>190</b>	<b>0</b>

\* The maximum possible score is 20 because of a multiplier. See page 14 for further explanation.





# Endnotes

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**Access to Nutrition Foundation**

Arthur van Schendelstraat 650  
3511 MJ Utrecht  
The Netherlands  
+31 (0)30 410 09 16  
[info@accesstonutrition.org](mailto:info@accesstonutrition.org)  
[www.accesstonutrition.org](http://www.accesstonutrition.org)



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