



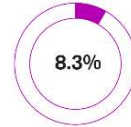
Ajinomoto

Score: 8.2% | Rank: 20th

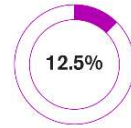
Ajinomoto has an overall score of 8.2% and ranks 20th amongst the 25 evaluated companies. Ajinomoto has considerable scope for improvement across all three sections – policy commitments (20th/25), management systems (21st/25) and disclosure (20th/25).

The third page has an overview of the scores achieved by Ajinomoto per indicator within each section. Please note that all scores and summaries are based on published information only.

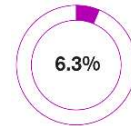
Policy
Commitments



Management
Systems



Disclosure



Elements in Place

- **Policy commitments:** The company clearly states that its anti-bribery and corruption (ABC) policy covers interactions with government officials, outlines specific actions to take should one become aware of instances of bribery / corruption, and applies to intermediaries. Ajinomoto is a member of the Scaling-Up Nutrition (SUN) network, so commits to the 'SUN Movement's Principles of Engagement'.
- **Management systems:** Responsibility for compliance with the ABC policy lies with the Presidents of each company in the group. There are clear lines to report any doubts regarding interpretation, regular audits regarding compliance with and execution of the policy, and clear actions that will be taken in case of violation. Ajinomoto also has a whistleblowing mechanism that is communicated to employees as part of training and onboarding.
- **Disclosure:** Ajinomoto discloses information on their lobbying activities via the EU Transparency register and French HATVP, including a list of meetings with EU officials in 2021 and the offices/types of public officials that the company interacts with. Both disclosures are mandatory in order to access policymakers, and the disclosures are only available on third-party websites, rather than the company's own domain.



Recommendations for improvement

- **Policy commitments:** Ajinomoto is recommended to clearly commit to lobby in support of public health policies that promote the consumption of healthy diets, and governments' policy efforts to align with SDGs 2 and 3, and the WHO Global Action Plan for the Prevention and Control of NCDs 2013-2030. We also recommend that Ajinomoto commit to disclose all political donations made in all markets (or make none at all, outside of its home market).
- **Management systems:** The company should provide more details in its 'Group Shared Policy on Political Activities and Political Contributions'. For example, under the 'Political Contributions' section, after providing that 'to ensure compliance, the person seeking approval shall first consult the legal function within the company', it should explain how compliance will be assessed and the process to address noncompliance. The company should 1) also confirm that the Board has oversight over this policy and lobbying activities, and conducts formal reviews of trade associations, 2) name an executive / function with responsibility for implementation of the policy, 3) clarify control mechanisms such as regular Board reporting, internal audits. Ajinomoto can also improve its whistleblowing system by clarifying that it is open to all employees and displaying it prominently on the company website.
- **Disclosure:** Ajinomoto can begin by publishing information on its whistleblowing mechanism, such as the number of issues raised and resolved, to increase the level of transparency and accountability. It could also disclose which policy topics it lobbies on, and what its positions are; if it does not lobby on any relevant policy topics, it should explicitly state so. Ajinomoto should also publish the expenditures on its trade association memberships, for example the SNIAA, and the amount of dues used for lobbying purposes.

Spotlight on Lobbying 2022 | Ajinomoto



#	Score per indicator for Ajinomoto	Company score	Average score
Policy commitments: 6.7 total / 80 maximum			
1	Commitment to not lobby against (or commitment to only lobby in support of) public health policies/measures	0.0	1.2
2	Commitment to respect public health policy frameworks in its lobbying activities	0.0	0.6
3	Respect for relevant lobbying standards and codes	1.7	1.8
4	Political donations	0.0	3.6
5	Codes of conduct to prevent bribery & corruption	5.0	7.9
6	Controls over trade associations and industry policy groups	0.0	2.0
7	Crowding out	0.0	0.6
8	Working with others in pursuit of the public interest	0.0	1.1
Management systems: 10.0 total / 80 maximum			
9	Accountability and responsibility for policy implementation	0.0	4.9
10	Conflicts of interest and revolving door	0.0	1.0
11	Anti-bribery and corruption	7.5	6.8
12	Political donations	0.0	2.4
13	Controls over membership of associations/organizations	0.0	2.4
14	Controls over lobbyists to ensure that they understand and adhere to the company's policies	0.0	2.3
15	Auditing	0.0	0.1
16	Whistleblowing mechanisms	2.5	6.1
Disclosure: 11.9 total / 190 maximum			
17	Taxation of products with high added sugar.	0.0	0.6
18	Measures to regulate the marketing of unhealthy foods to children.	0.0	0.9
19	Front-of-pack (FOP) labelling requirements.	0.0	1.8
20	Influencing national dietary guidelines.	0.0	0.7
21	Other policies to improve public health and diets.	0.0	2.0
22	Disclosure of key lobbying information	3.8	2.0
23	Memberships of trade associations	5.6	3.2
24	Activities undertaken by trade associations	0.0	0.2
25	Alignment between lobbying principles and trade associations	0.0	0.1
26	Expenditures on trade associations	0.0	1.2
27	Expenditures on lobbyists (in-house and third party)	2.5	1.8
28	Political donations and contributions	0.0	2.3
29	Conflicts of interest	0.0	0.0
30	Auditing	0.0	0.2
31	Whistleblowing mechanisms	0.0	2.7
32	Other disclosures	0.0	0.4
33	External stakeholder engagement	0.0	0.3
34	Disclosure of lobbying policy	0.0	4.5
35	Main disclosure regarding lobbying activities/expenditures	0.0	3.0
	Total: 28.8 / 350	28.8	