



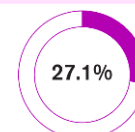
Arla

Score: 15.6% | Rank: 17th

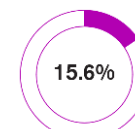
Arla has an overall score of 15.6% and ranks 17th amongst the 25 evaluated companies. Arla performed stronger on Policy commitments (8th/25), but less information was found regarding its Management systems (17th/25) and Disclosure (17th/25).

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

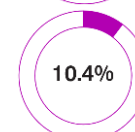
Policy Commitments



Management Systems



Disclosure



Elements in Place

- **Policy commitments:** Arla has committed to not make any political donations. It has strong policy commitments to prevent bribery and corruption in its 'Anti-Bribery Directive' document, which covers the company's lobbying activities, applies to intermediaries, includes reporting guidance, examples of concerning activities, and specific guidance on gifts. Arla is also a member of the Scaling-Up Nutrition network, so commits to the 'SUN Movement's Principles of Engagement'.
- **Management systems:** Arla has effective management systems for ensuring adherence to its anti-bribery and corruption (ABC) policy that include an anti-bribery compliance manager with day-to-day responsibilities for implementation and monitoring effectiveness, and regular auditing by the Global Risk and Compliance Department to ensure effectiveness. Its Executive Management Group oversees the implementation.
- **Disclosure:** Arla publishes a stand-alone responsible lobbying policy and discloses its lobbying activities on the EU transparency Register. The disclosures include a list of meetings with EU Commissioners and members of the Cabinet, a list of trade association memberships and lobbying expenditures for the EU market. In addition, the company discloses details of its whistleblowing system, such as the number of cases raised through the system.

Recommendations for improvement

- **Policy commitments:** Arla 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.
- **Management systems:** Arla is recommended to describe its processes for managing third-parties, specifically 1) the process of reviewing the lobbying positions of trade association / industry group memberships and addressing any misalignment, and 2) the process of training and monitoring lobbyists and sanctioning breaches to the company's lobbying policies.
- **Disclosure:** Arla is encouraged to 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. Arla should also publish the expenditures on its trade association memberships, including the amount of dues used for lobbying purposes, and a description of the purpose of these trade associations and any lobbying activities carried out on the company's behalf.



#	Score per indicator for Arla	Company score	Average score*
Policy commitments – 21.7 / 80			
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	10.0	3.6
5	Codes of conduct to prevent bribery & corruption	10.0	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 – 12.5 / 80			
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	10.0	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 – 18.8 / 180			
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	2.5	2.0
23	Memberships of trade associations	3.8	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	N/A	2.3
29	Conflicts of interest	0.0	0.0
30	Auditing	0.0	0.2
31	Whistleblowing mechanisms	2.5	2.7
32	Other disclosures	0.0	0.4
33	External stakeholder engagement	0.0	0.3
34	Disclosure of lobbying policy	7.5	4.5
35	Main disclosure regarding lobbying activities/expenditures	0.0	3.0
Total: 52.9 / 340			