



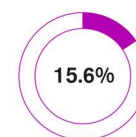
Campbell

Score: 16.3% | Rank: 16th

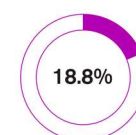
Campbell has an overall score of 16.3% and ranks 16th amongst the 25 evaluated companies. Campbell's strongest area relative to its peers was Disclosure (12th/25), followed by Policy commitments (15th/25) and Management systems (16th/25).

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

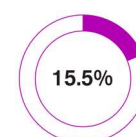
Policy Commitments



Management Systems



Disclosure



Elements in Place

- **Policy commitments:** Campbell's anti-bribery and corruption (ABC) policy applies to lobbying activities and intermediaries, includes clear reporting lines, and provides examples of bribery and corruption and specific guidance on gifts. Campbell also commits to support science-based efforts to promote healthy diets in its 2021 'Political Accountability Report'.
- **Management systems:** Campbell's Board of Directors reviews all political spending, while the Government Affairs Department manages the company's political engagement. The company also assigns clear responsibilities to the Director of Corporate Compliance and Ethics to administer and maintain the ABC code, and to the Audit Committee of the Board of Directors to oversee enforcement, including investigating and sanctioning violations.
- **Disclosure:** Campbell publishes a stand-alone responsible lobbying policy. In its 'Political Accountability Guidelines', Campbell states its positions on certain policy, including that it is in favor of effective industry self-regulation of advertising and marketing programs, a uniform national food labelling system, the reform of US regulatory agencies, and systems to ensure safe and efficient food production. Campbell also discloses its trade association memberships with dues exceeding \$10,000, and a partial list of the portion of dues paid to these trade organizations for lobbying purposes. It further discloses third-party lobbying expenditures in the US market.

Recommendations for improvement

- **Policy commitments:** Campbell is recommended to clearly commit to lobby in support of specific 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. Campbell should also broaden its commitment to disclose political donations to include all markets where they are made, or commit to make no such donations outside of its home market.
- **Management systems:** Campbell should prominently display its whistleblowing system ('Integrity Hotline') on its website and publicly communicate the system to employees as part of onboarding and training sessions. Campbell could extend the Board's oversight of its lobbying



policy to all aspects, rather than political contributions only. Finally, Campbell should review the positions of its trade association / industry group memberships, outlining approaches to address misalignment, and establish processes to train lobbyists and investigate and sanction any breaches of its lobbying policies.

- **Disclosure:** Campbell is encouraged to disclose more information on the specific 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. Campbell should also publish a description of the purpose of the trade associations it discloses and any lobbying activities carried out on the company's behalf, and disclose any trade associations it belongs to outside of the US (or state that there are none).



#	Score per indicator for Campbell	Company score	Average score*
Policy commitments – 12.5 / 80			
1	Commitment to not lobby against (or commitment to only lobby in support of) public health policies/measures	2.5	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	0.0	1.8
4	Political donations	0.0	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 – 15.0 / 80			
9	Accountability and responsibility for policy implementation	7.5	4.9
10	Conflicts of interest and revolving door	0.0	1.0
11	Anti-bribery and corruption	5.0	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 – 29.4 / 190			
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.	2.0	0.7
21	Other policies to improve public health and diets.	4.0	2.0
22	Disclosure of key lobbying information	0.0	2.0
23	Memberships of trade associations	1.9	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	2.5	1.2
27	Expenditures on lobbyists (in-house and third party)	2.5	1.8
28	Political donations and contributions	5.0	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	7.5	4.5
35	Main disclosure regarding lobbying activities/expenditures	4.0	3.0
Total: 56.9 / 350			