



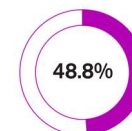
Danone

Score: 36.2% | Rank: 5th

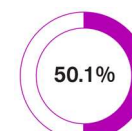
Danone has an overall score of 36.2% and ranks 5th amongst the 25 evaluated companies. Danone's performs strongly relative to its peers in each section (3rd in Policy commitments, and 6th in Management systems and Disclosure. The company has previously been assessed against the Responsible Lobbying Framework (RLF) as a BMS manufacturer in 2021, and has since acted on several of the recommendations resulting from that assessment. Nevertheless, the company still has significant room for improvement, especially on disclosure.

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

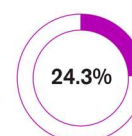
Policy Commitments



Management Systems



Disclosure



Elements in Place

- Policy commitments:** Danone states “Where the company does engage in advocacy activities, this will be with the interests of the consumer in mind and the will to meet public health goals (of which tackling obesity, mal- or under-nutrition).” Danone prohibits “corporate political contributions of all forms including in-kind contributions” in its Policy on Advocacy. It also has robust commitments outlined in the Integrity Policy, Code of Business Conduct, and Policy on Advocacy to prevent bribery and corruption in lobbying, which applies to intermediaries, provides guidance on reporting of concerns, gifts and examples of what constitutes bribery / corruption. Notably, Danone’s Policy on Advocacy contains statements on working with others in pursuit of the public health interest, including its support for the IFBA’s Guiding Principles for Multi-stakeholder Engagement.
- Management systems:** Danone’s ‘2021 Universal Registration’ document assigns clear responsibilities for the implementation of its lobbying policy, including Board oversight of the policy, responsible functions (Compliance) and control mechanisms (internal audits). Danone also has relatively comprehensive controls over lobbyists to ensure adherence to its lobbying policies. The controls cover both in-house lobbyists involved in trade association and multi-stakeholder coalitions as well as third parties used in advocacy campaigns (to whom its internal Third-Party Vetting rules apply). Danone has further established mechanisms to address the ‘revolving door’, including the review of individual situations, applying ‘cooling off’ periods, and restrictions through job specifications / employee contracts.
- Disclosure:** Danone’s Policy on Advocacy is a dedicated, Board-approved responsible lobbying policy. Danone’s extensive disclosures include its lobbying positions on public health topics, such as labelling requirements and responsible marketing, and a partial list of trade association memberships in multiple markets.



Recommendations for improvement

- **Policy commitments:** While Danone makes a broad commitment to lobby in support of public health goals, the company should also commit to support specific WHO-endorsed public health policies and initiatives in its lobbying activities, as well as 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. Since Danone is already working with various stakeholders to engage with policy development, it should consider making it an explicit commitment to respect and safeguard other interest groups' lobbying opportunities.
- **Management systems:** Danone should assign further responsibility for the Board to oversee its specific lobbying positions and activities in its 'Universal Registration' document. Regarding its policy on political donations, Danone should further develop (or publish any existing) tracking and enforcement mechanisms to ensure adherence to its policy. We also recommend that the company clarify its approaches to address potential misalignment between its own lobbying positions and its trade associations'. Finally, Danone should implement internal and/or external audits to verify compliance with its policies.
- **Disclosure:** Since Danone periodically reviews its trade association memberships, it is encouraged to disclose the results of these reviews, including examples of where misaligned positions may have been identified and any action taken (or stating that no misalignment has been found). In addition, Danone should disclose its expenditures on trade associations, including dues spent on lobbying. While Danone commits to working with others in its advocacy efforts in pursuit of the public health interest, it should disclose specific examples of doing so.



#	Score per indicator for Danone	Company score	Average score
Policy commitments: 39.1 total / 80 maximum			
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	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	5.0	2.0
7	Crowding out	0.0	0.6
8	Working with others in pursuit of the public interest	10.0	1.1
Management systems: 40.1 total / 80 maximum			
9	Accountability and responsibility for policy implementation	7.5	4.9
10	Conflicts of interest and revolving door	6.0	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	5.0	2.4
14	Controls over lobbyists to ensure that they understand and adhere to the company's policies	6.6	2.3
15	Auditing	0.0	0.1
16	Whistleblowing mechanisms	10.0	6.1
Disclosure: 43.8 total / 180 maximum			
17	Taxation of products with high added sugar.	0.0	0.6
18	Measures to regulate the marketing of unhealthy foods to children.	4.0	0.9
19	Front-of-pack (FOP) labelling requirements.	5.0	1.8
20	Influencing national dietary guidelines.	2.5	0.7
21	Other policies to improve public health and diets.	3.0	2.0
22	Disclosure of key lobbying information	5.3	2.0
23	Memberships of trade associations	5.0	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	0.0
34	Disclosure of lobbying policy	10.0	4.5
35	Main disclosure regarding lobbying activities/expenditures	4.0	3.0
Total: 122.9 / 340			