



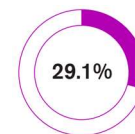
# Ferrero

**Score: 19.2% | Rank: 12<sup>th</sup>**

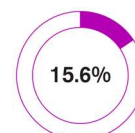
Ferrero has an overall score of 19.2% and ranks 12th amongst the 25 evaluated companies. Ferrero strongest areas relative to its peers were Policy commitments (7<sup>th</sup>) and Disclosure (9<sup>th</sup>), but it falls behind in Management systems (17<sup>th</sup>).

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

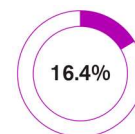
**Policy  
Commitments**



**Management  
Systems**



**Disclosure**



## Elements in Place

- Policy commitments:** Ferrero states that it “does not allow contributions to political parties and / or to candidates for public office” in its Code of Business Conduct.<sup>1</sup> Ferrero outlines its anti-bribery and corruption commitments in the Code of Business Conduct and the Code of Ethics, covering lobbying activities, clear guidance on gifts, and processes for reporting concerns, and applies to intermediaries also. Ferrero also states that it “maintains constructive dialogue with representative associations and organizations, that work for the improvement of civil, social, environmental and cultural conditions and participates in partnership projects with them”.<sup>2</sup>
- Management systems:** Every department at Ferrero “must enforce and guarantee that their actions and activities adhere to the principles and rules of conduct” contained in its Code of Ethics and is responsible for the detection and management of non-compliance.<sup>3</sup> An internal Audit can be activated, if necessary, to ensure compliance with the company’s the lobbying policies. Ferrero also has an easily accessible whistleblowing mechanism, known as the ‘Integrity Helpline’.
- Disclosure:** Ferrero primarily discloses information about its lobbying activities on mandatory lobbying registers, such as in the US, EU, and France.

<sup>1</sup> <https://s3-eu-west-1.amazonaws.com/ferrero-static/globalcms/documenti/3631.pdf>

<sup>2</sup> <https://s3-eu-west-1.amazonaws.com/ferrero-static/globalcms/documenti/3710.pdf>

<sup>3</sup> <https://s3-eu-west-1.amazonaws.com/ferrero-static/globalcms/documenti/3710.pdf>



### Recommendations for improvement

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- **Policy commitments:** Ferrero is encouraged to commit to ensuring that its lobbying activities support 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. Ferrero should also commit to put in place controls over trade associations and industry policy groups to ensure alignment with their lobbying activities. The company is also encouraged to review the OECD Principles for Transparency and Integrity in Lobbying and the Transparency International Standards for Lobbying Regulation and integrate them into a responsible lobbying policy.
- **Management systems:** Regarding anti-bribery and corruption, Ferrero should provide clarity on the process for payment, gift pre-approval and record-keeping in its policies, and clearly assign a function to oversee the implementation. The company should also start establishing controls over its trade association memberships, including reviews by the Board, and describe approaches to address potential misalignment between its own lobbying positions and those of the trade associations. Moreover, Ferrero should develop systems to track its political expenditures to enforce the prohibition of political donations. Finally, Ferrero should develop clear processes for following up on complaints via its Integrity Helpline webpage, and tracking progress of cases and their outcomes.
- **Disclosure:** Ferrero should publish a stand-alone, Board-approved, responsible lobbying policy. Ferrero should also publish information on its own domain about its lobbying positions and activities in relation to specific public health measures that affects industry, as well as its lobbying-related expenditures. Finally, Ferrero is encouraged to publish an updated list of trade associations globally, including the membership dues, any Board seats held, and a brief description of the purpose and/or activities undertaken by the trade association on behalf of the company.



#	Score per indicator for Ferrero	Company score	Average score
<b>Policy commitments: 23.3 total / 80 maximum</b>			
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	8.4	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	3.3	1.1
<b>Management systems: 12.5 total / 80 maximum</b>			
9	Accountability and responsibility for policy implementation	2.5	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	5.0	6.1
<b>Disclosure: 29.6 total / 180 maximum</b>			
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.	2.5	1.8
20	Influencing national dietary guidelines.	0.0	0.7
21	Other policies to improve public health and diets.	5.5	2.0
22	Disclosure of key lobbying information	5.3	2.0
23	Memberships of trade associations	2.8	3.2
24	Activities undertaken by trade associations	0.0	0.0
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	0.0	2.7
32	Other disclosures	0.0	0.4
33	External stakeholder engagement	0.0	0.3
34	Disclosure of lobbying policy	5.0	4.5
35	Main disclosure regarding lobbying activities/expenditures	6.0	3.0
<b>Total: 65.4 / 340 maximum</b>			