



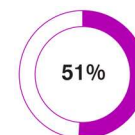
FrieslandCampina

Score: 44.8% | Rank: 2nd

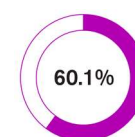
FrieslandCampina has an overall score of 44.8% and ranks 2nd amongst the 25 evaluated companies. FrieslandCampina has stronger practices across all sections – Policy commitments (2nd), Management systems (3rd) and Disclosure (1st). The company has previously been assessed against the Responsible Lobbying Framework (RLF) as a BMS manufacturer in 2021, so has had the opportunity to improve its practices since that time. The company still has significant room for improvement, especially on disclosure.

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

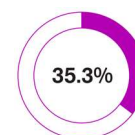
Policy Commitments



Management Systems



Disclosure



Elements in Place

- Policy commitments:** FrieslandCampina's Policy on Responsible Advocacy is "inspired by the RLF, the OECD Principles for Transparency and Integrity in Lobbying and the Transparency and International Standards for Lobbying Regulation". The policy explicitly states that all lobbying activities "must comply with the company's ... Nutrition Policy", which covers promoting healthy diets, and also states that the company does not support or make political contributions. Moreover, FrieslandCampina commits to working with others in lobbying (Compass for Good Business Conduct) and safeguarding the opportunity for other interest groups to lobby (FrieslandCampina Policy for Responsible Advocacy) to support public health interests.
- Management systems:** FrieslandCampina has tracking and enforcement mechanisms to implement its policy on political donations, laid out in its Compass for Good Business Conduct. The company assigns Board oversight of its lobbying policies, positions and activities, names responsible functions for implementation, and requires regular reporting to the Board on lobbying activities. Moreover, the company describes its approaches to managing the 'revolving door' in its Policy on Responsible Advocacy, for example by adapting job specifications and employment contracts to include specific restrictions.
- Disclosure:** FrieslandCampina has a dedicated, Board-approved responsible lobbying policy, and discloses lobbying-related information in its Annual Report according to the Global Reporting Initiative guidelines.¹ Following the AA1000 Stakeholder Engagement Standard, the company also discloses all of its interactions with policymakers globally, including on topics of taxation of products with high added sugar, marketing of unhealthy foods to children, Front-of-pack (FOP) labelling requirements, and influencing national dietary guidelines, providing specific examples. It is therefore the most comprehensive disclosure of its actual lobbying activities, being one of the only companies that goes beyond disclosure through transparency registers. Finally, the company publishes a description of the principal lobbying activities of its membership trade associations.

¹ <https://www.frieslandcampina.com/about-frieslandcampina/financials/financial-and-sustainability-reports/>



Recommendations for improvement

- **Policy commitments:** FrieslandCampina should explicitly link the commitments it makes in its Corporate Standard for Nutritional Information [labelling], the Corporate Standard for Responsible Marketing Communications, and on its 'Better Products' webpage [relating to reducing the use of sugar, fat and sodium] to its advocacy efforts, either committing to support the development of such policies or to not lobby against them. It should further commit to conducting regular reviews of trade association memberships to achieve consistency between its own commitments and lobbying activities carried out by membership organizations. Finally, the company is encouraged to expand its commitment to safeguard the opportunities of others to lobby by committing to take steps towards spending proportionate resources on lobbying, to safeguard access for other interests, regardless of legal caps on political donations.
- **Management systems:** FrieslandCampina states that it requires that its trade associations "operate to the same responsible advocacy standards as FrieslandCampina";² and it will engage with all stakeholders involved in cases of misalignment. To enforce such expectations, we recommend that the company develops management systems such as periodic reviews of memberships by the Board and protocols to address misaligned positions. The company is also encouraged to develop processes to investigate and sanction any breaches of the company's lobbying policies by both staff and third parties.
- **Disclosure:** FrieslandCampina should disclose its expenditures on direct lobbying and through trade associations (membership dues and, ideally, the amount attributable to lobbying activities). FrieslandCampina is also recommended to explicitly outline its lobbying positions on key public health measures that affect industry, and elaborate on the public interest justifications for these positions. FrieslandCampina should also publish more information on the use of its whistleblowing mechanism, such as the number of issues raised and resolved, to increase the level of transparency and accountability.

² <https://www.frieslandcampina.com/uploads/2022/09/FrieslandCampina-Policy-on-Responsible-Advocacy-1-June-2022-1.pdf>



#	Score per indicator for FrieslandCampina	Company score	Average score
Policy commitments: 40.8 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	10.0	1.8
4	Political donations	10.0	3.6
5	Codes of conduct to prevent bribery & corruption	5.0	7.9
6	Controls over trade associations and industry policy groups	5.0	2.0
7	Crowding out	5.0	0.6
8	Working with others in pursuit of the public interest	3.3	1.1
Management systems: 48.1 total / 80 maximum			
9	Accountability and responsibility for policy implementation	10.0	4.9
10	Conflicts of interest and revolving door	4.0	1.0
11	Anti-bribery and corruption	7.5	6.8
12	Political donations	10.0	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	6.6	2.3
15	Auditing	0.0	0.1
16	Whistleblowing mechanisms	10.0	6.1
Disclosure: 63.6 total / 180 maximum			
17	Taxation of products with high added sugar.	4.0	0.6
18	Measures to regulate the marketing of unhealthy foods to children.	8.0	0.9
19	Front-of-pack (FOP) labelling requirements.	6.0	1.8
20	Influencing national dietary guidelines.	4.0	0.7
21	Other policies to improve public health and diets.	6.0	2.0
22	Disclosure of key lobbying information	8.0	2.0
23	Memberships of trade associations	3.8	3.2
24	Activities undertaken by trade associations	2.5	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)	0.0	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	10.0	4.5
35	Main disclosure regarding lobbying activities/expenditures	8.0	3.0
Total: 152.5 / 340			