



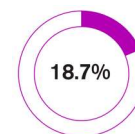
General Mills

Score: 27.5% | Rank: 7th

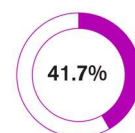
General Mills has an overall score of 27.5% and ranks 7th amongst the 25 evaluated companies. General Mills' strongest area relative to its peers was Disclosure (5th), followed by Management systems (11th), and Policy commitments (14th).

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

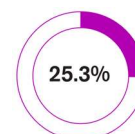
**Policy
Commitments**



**Management
Systems**



Disclosure



Elements in Place

- Policy commitments:** General Mills has an extensive Code of Conduct that applies to both staff and intermediaries, defines situations where an employee's role may constitute lobbying and requires special registrations or disclosures, and provides clear processes for reporting concerns, guidance on gifts, and scenarios of what constitutes bribery. General Mills commits on collaborating with others in pursuit of public health interests.
- Management systems:** General Mills states on its 'Civic Involvement' webpage that the Board has oversight over the company's political activities, including reviewing company policy on political expenditures, corporate political contributions, major trade association memberships and approval of independent political expenditures (although the company has not made any). The company is also one of two companies to indicate that it audits its lobbying disclosures and compliance with its policies. Furthermore, General Mills implements tracking and enforcement systems (e.g. policy reviews by its Public Responsibility Committee of the Board) for its policy on political donations. Finally, the company has a comprehensive whistleblowing system ('Speak Up' page) that is easily accessible and provides clear processes for reporting and following up on concerns.
- Disclosure:** On its 'Policy Engagement' website, General Mills discloses information on its engagement with public health policies, including FOP labelling, influencing national dietary guidelines, and Sodium reduction. Some disclosures cover not only the company's lobbying positions, but also the public interest justifications, the specific policies and legislation lobbied, such as the Farm to Fork Strategy, Simplifying Meal Service, and Monitoring Requirements in the National School Lunch and School Breakfast Programs. General Mills also indicates the result of its internal audit in the Compliance Statement of its Civic Involvement report.



Recommendations for improvement

- **Policy commitments:** General Mills should commit to lobby in support of public health policies that promote the consumption of healthy diets (including specific WHO-endorsed measures), 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. General Mills should better manage its trade association memberships and commit to review their positions and activities to ensure adherence to its own lobbying policies and positions. General Mills should commit to disclose all political donations made in markets outside of the US (or commit to make no such donations). 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:** General Mills should put in place systems to review the lobbying activities of its trade associations and develop protocols to address potential misalignment in lobbying positions. It should also consider adopting external audits to review its lobbying activities and expenditures. General Mills should provide training for both internal and third-party lobbyists on the company's lobbying policy and develop systems to investigate and sanction breaches. Lastly, General Mills should consider developing an approach to managing 'revolving door' practices, adopting control mechanisms such as cooling off periods and restrictions through contracts and job specifications.
- **Disclosure:** We recommend that General Mills disclose further details of its lobbying activities in other markets, including the identities of direct and intermediary lobbyists engaged, meetings with public officials and discussed/outcomes sought, as well as political donations made (if any) and trade association memberships. The company could also disclose more information about its trade association memberships, such as a brief description of the purpose and/or activities undertaken by the trade association on behalf of the company. Finally, it should disclose information on the use of its whistleblowing system, including the number of cases raised and resolved, breakdowns by issue type, geography, business unit, and Information on resolution.

Spotlight on Lobbying 2022 | General Mills



#	Score per indicator for General Mills	Company score	Average score
Policy commitments: 15.0 total / 80 maximum			
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	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	3.3	1.1
Management systems: 33.3 total / 80 maximum			
9	Accountability and responsibility for policy implementation	5.0	4.9
10	Conflicts of interest and revolving door	0.0	1.0
11	Anti-bribery and corruption	7.5	6.8
12	Political donations	5.0	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	0.0	2.3
15	Auditing	0.8	0.1
16	Whistleblowing mechanisms	10.0	6.1
Disclosure: 48.1 total / 190 maximum			
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.	2.3	1.8
20	Influencing national dietary guidelines.	7.0	0.7
21	Other policies to improve public health and diets.	7.0	2.0
22	Disclosure of key lobbying information	0.0	2.0
23	Memberships of trade associations	2.8	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	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	5.0	0.2
31	Whistleblowing mechanisms	0.0	2.7
32	Other disclosures	5.0	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	4.0	3.0
Total: 96.4 / 350			