



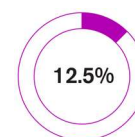
Keurig Dr Pepper

Score: 17.2% | Rank: 15th

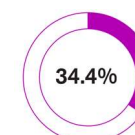
Keurig Dr Pepper (KDP) has an overall score of 17.2% and ranks 15th amongst the 25 evaluated companies. KDP's strongest area relative to other companies was Management systems (12th), followed by Disclosure (16th) and Policy commitments (16th).

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

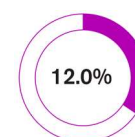
**Policy
Commitments**



**Management
Systems**



Disclosure



Elements in Place

- **Policy commitments:** KDP has a Code of Conduct that covers lobbying-related bribery and corruption, applies to intermediaries (consultants, vendors, contractors, and other third parties), and provides detailed guidance on gifts and the reporting process.
- **Management systems:** KDP's 'Political Engagement' document outlines the responsible functions and control mechanisms to implement the company's lobbying related policies. In addition to the Board of Directors having ultimate oversight of political engagement activities, the Vice President of Government Affairs periodically updates the Board on the company's political, lobbying, and other grassroots advocacy activities, including political contributions. KDP's Audit Committee is responsible for their ABC policy and monitoring compliance with the company's Code of Conduct alongside the General Counsel's office.
- **Disclosure:** KDP discloses a 'List of Industry Association Dues and Support' containing all trade association memberships in the US to which it pays dues over \$100 (a level of granularity that surpasses all other companies assessed). Regarding political contributions and donations in the US (its home market), the company clarifies in its Corporate Political Contributions document that "Keurig Dr Pepper did not make any direct state and local political contributions at the corporate level in 2018, 2019 or 2020", and mandatorily discloses its federal contributions on the Federal Electoral Commission (FEC) registry.¹

¹ https://www.keurigdrpepper.com/content/dam/keurig-brand-sites/kdp/files/Political_Contributions_Policy_November_2019.pdf



Recommendations for improvement

- **Policy commitments:** KDP should commit to disclose all political donations in all markets (or commit not to make any outside of the US). Additionally, KDP should commit to lobby only in support of (or not lobby against) public health policies that promote the consumption of healthy diets (such as regulatory restrictions on marketing to children and FOP labelling requirements), and to 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, through its lobbying. In addition, 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:** KDP should systematically review trade association memberships at Board-level in its current review of lobbying activities. This is crucial for achieving consistent positions in company's own lobbying practices and lobbying conducted through trade associations and other third parties. KDP should also provide further guidance on the payment and gift pre-approval processes and record-keeping in its Code of Conduct. Finally, KDP is encouraged to develop (or disclose) processes to manage potential cases of the 'revolving door', for example through requiring 'cooling off' periods and/or restrictions in employee contracts.
- **Disclosure:** KDP is encouraged to clarify whether it belongs to any trade associations outside of the US, and disclose them (including the dues it pays). KDP should also publish details of the use of its whistleblowing mechanisms, including the number of cases raised and resolved, breakdowns by issue type, geography, business units and information on resolution. Finally, as KDP develops and implements the policy commitments and management systems recommended above, it should publicly communicate the relevant policies and control mechanisms put in place.



#	Score per indicator for KDP	Company score	Average score
Policy commitments: 10.0 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	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: 27.5 total / 80 maximum			
9	Accountability and responsibility for policy implementation	10.0	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	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	0.0	2.3
15	Auditing	0.0	0.1
16	Whistleblowing mechanisms	5.0	6.1
Disclosure: 22.8 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.	0.0	1.8
20	Influencing national dietary guidelines.	0.0	0.7
21	Other policies to improve public health and diets.	0.0	2.0
22	Disclosure of key lobbying information	0.0	2.0
23	Memberships of trade associations	3.8	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	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	4.0	3.0
Total: 60.3 / 350			