



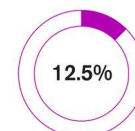
# Kraft Heinz

**Score: 17.9% | Rank: 14<sup>th</sup>**

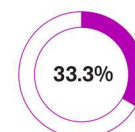
Kraft Heinz has an overall score of 17.9% and ranks 14<sup>th</sup> amongst the 25 evaluated companies. Kraft Heinz' strongest area relative to its peers was Management systems (13<sup>th</sup>), followed by Disclosure (15<sup>th</sup>) and Policy commitments (16<sup>th</sup>). The company has previously been assessed against the Responsible Lobbying Framework (RLF) as a BMS manufacturer in 2021, and so has had the opportunity to act upon the recommendations resulting from that assessment. The company continues to have significant room for improvement across each area.

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

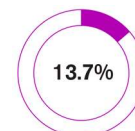
**Policy Commitments**



**Management Systems**



**Disclosure**



## Elements in Place

- Policy commitments:** Kraft Heinz' Code of Conduct provides guidance on gifts and examples of what constitutes bribery/corruption, and applies to third-parties. Kraft Heinz also has a risk-based Anti-Bribery/ Anti-Corruption (ABAC) due diligence program that is run by the Ethics & Compliance team.
- Management systems:** Kraft Heinz states that its Board “receives an annual update on political and lobbying activities and discusses with management their strategies and recommendation”, and that it partners with outside counsel to conduct an annual internal audit of all lobbying practices and reporting. Kraft Heinz's employees require approval from the Global Head of Government Affairs before making any political contributions from corporate funds. Its anti-bribery and corruption applies to third parties, provides clear gift pre-approval and record keeping processes, and specifies consequences of potential violation. Finally, Kraft Heinz has a whistleblowing system prominently displayed on the Ethics & Compliance webpage, which has clear guidance on following up on cases and tracking progress.
- Disclosure:** Kraft Heinz discloses its US trade association memberships to which it pays dues over \$50,000 (as well as those required to disclose on the EU Transparency Register). Kraft Heinz publishes a letter of instruction to its trade associations stipulating that trade associations dues must only be used “on issues of importance to our business and none may be provided to support or oppose political candidates”, being one of few companies to disclose a specific example of engagement with its trade associations.<sup>1</sup>



### Recommendations for improvement

---

- **Policy commitments:** Kraft Heinz is 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. The company is also encouraged to clearly 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. Finally, Kraft Heinz should also commit to disclose all political donations made outside of the US on its own domain.
- **Management systems:** Kraft Heinz is recommended to systematically review the positions and activities of its trade associations at Board-level to assess the extent to which they align with their own positions and policies. The company should 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. Finally, Kraft Heinz should ensure that it publicly communicate its whistleblowing system to staff via onboarding and training processes.
- **Disclosure:** Kraft Heinz should extend disclosures on its lobbying activities and expenditures beyond markets where it is required to do so by transparency registers. The company should also ensure that it discloses which specific policy topics it lobbies on, and what its positions are; if it does not lobby on any relevant policy topics (especially those relating to nutrition), it should explicitly state so. Kraft Heinz could also be more transparent about its trade association memberships, lowering the threshold for disclosure to at most \$10,000, and ensuring that it discloses trade association memberships outside of the US (or state that there are none).

## Spotlight on Lobbying 2022 | Kraft Heinz



#	Score per indicator for Kraft Heinz	Company score	Average score
<b>Policy commitments: 10.0 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	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
<b>Management systems: 26.7 total / 80 maximum</b>			
9	Accountability and responsibility for policy implementation	7.5	4.9
10	Conflicts of interest and revolving door	0.0	1.0
11	Anti-bribery and corruption	10.0	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	1.7	0.1
16	Whistleblowing mechanisms	7.5	6.1
<b>Disclosure: 26.0 total / 190 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.	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	0.3	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	3.3	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	5.6	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
<b>Total: 62.7 / 350</b>			