



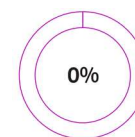
Lactalis

Score: 4.7% | Rank: 24th

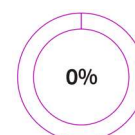
Lactalis has an overall score of 4.7% and ranks 24th amongst the 25 evaluated companies. Lactalis has disclosures on regional registers, but the scope of disclosure is limited. We found no evidence of lobbying-related Policy commitments or Management systems for Lactalis in the public domain.

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

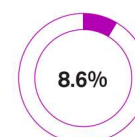
Policy Commitments



Management Systems



Disclosure



Elements in Place

- **Disclosure:** Lactalis discloses on the French HATVP that the company lobbied to “raise awareness about the impact of the Nutriscore project on the dairy industry”,¹ demonstrating the company’s engagement with nutrition labelling measures. Lactalis also discloses a list of meetings held with EU officials (no meetings held in 2021) on the EU Transparency Register. Its trade association memberships and lobbying expenditures are disclosed via the EU Transparency Register and the French HATVP, for the respective markets.

Recommendations for improvement

- **Policy commitments:** As Lactalis begins to adopt responsible lobbying practices, the company should develop (and/or publish any existing) an anti-bribery corruption (ABC) policy which explicitly relates to lobbying, and provides specific guidance on gifts and what to do if one becomes aware of any potential or actual bribery/corruption. Lactalis is also encouraged to develop a lobbying policy taking inspiration from the OECD Principles for Transparency and Integrity in Lobbying and/or the Transparency International Standards for Lobbying Regulation. Lactalis should also commit either to not make any political donations, or disclose all those it makes.
- **Management systems:** In addition to the ABC policy recommendations above, Lactalis is recommended to provide clear guidance on gift pre-approval and record keeping processes, and specify the consequences of potential violation. The protocols should apply to third parties acting on the company’s behalf. Lactalis should also set up whistleblowing mechanisms to allow employees and external stakeholders to report concerns related to lobbying. Lactalis is also encouraged to develop (or disclose information about) its internal accountability arrangements for lobbying, ensuring that its Board has oversight over the company’s lobbying policy, positions, and activities, and trade association memberships.

¹ <https://www.hatvp.fr/fiche-organisation/?organisation=331142554##>



- **Disclosure:** Lactalis' only lobbying disclosure is made via mandatory transparency registers in specific markets. It should further disclose information about its lobbying activities and expenditures in other markets, or explicitly state that it does not lobby beyond these markets. We recommend the company develop a dedicated, Board-approved responsible lobbying policy to communicate, following the above recommendations, its policy commitments and management systems to both internal and external stakeholders to demonstrate legitimate, transparent, and responsible lobbying practices. The company should also disclose which specific policy topics it lobbies on, and what its positions are; if it does not lobby on any relevant policy topics (especially those related to nutrition), it should explicitly state so.



#	Score per indicator for Lactalis	Company score	Average score
Policy commitments: 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	0.0	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: 0 total / 80 maximum			
9	Accountability and responsibility for policy implementation	0.0	4.9
10	Conflicts of interest and revolving door	0.0	1.0
11	Anti-bribery and corruption	0.0	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	0.0	6.1
Disclosure: 16.4 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.	3.0	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	5.3	2.0
23	Memberships of trade associations	5.6	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	0.0	1.2
27	Expenditures on lobbyists (in-house and third party)	2.5	1.8
28	Political donations and contributions	0.0	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	0.0	4.5
35	Main disclosure regarding lobbying activities/expenditures	0.0	3.0
Total: 16.4 / 350			