



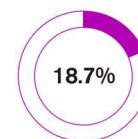
Mars

Score: 13.8% | Rank: 19th

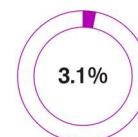
Mars has an overall score of 13.8% and ranks 19th amongst the 25 evaluated companies. Mars strongest area (relative to its peers) was Disclosure (10th), followed by Policy commitments (14th), yet there is considerable scope for improvement in Management systems (24th).

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

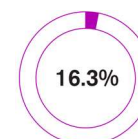
**Policy
Commitments**



**Management
Systems**



Disclosure



Elements in Place

- Policy commitments:** Mars states that the company “does not make financial contributions to candidates, or to political parties or committees” and does not “contribute corporate funds to support electioneering communications.” Mars’ ‘Anticorruption and Human Rights Expectation Letter to Business Partners’ covers “bribes including money, favors, gifts or entertainment provided to government officials or business partners in order to obtain or retain business, or to improperly influence decision-making...”.¹
- Management systems:** Mars does not publish much information about its management systems relating to lobbying. The company provides an email address (Whistleblower Line) for ‘Report Violations of Law to the Mars Legal and Compliance’ on the company’s Legal page (but does not specify if the system addresses concerns over lobbying practices).
- Disclosure:** Mars discloses a list of its “key” industry trade associations (last updated in 2019), which is global in scope. On its ‘Public Policy & Advocacy’ webpage, the publishes links to its disclosures on the mandatory lobbying registers in the US and EU.

¹ [Anti-corruption and Human Rights Expectations for Business Partners](#)



Recommendations for improvement

- **Policy commitments:** While Mars states that its '5 Principles' underpin its lobbying activities, it is encouraged to be more specific and translate these principles into a concrete lobbying policy. 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. At a minimum, the company should develop (or publish any existing) dedicated ABC policy / code of conduct to address lobbying-specific bribery and corruption, providing clear guidance on gift pre-approval, record keeping processes and the consequences of potential violation. Mars is also recommended to clearly commit to lobby in support of public health policies that promote the consumption of healthy diets (including specific WHO-endorsed measures).
- **Management systems:** Mars should focus on building (or publishing about) management systems to implement its lobbying policies. This includes assigning a functional responsibility to oversee the enforcement of its lobbying policies, such as the ban on political contributions and donations. It should also put in place systems to manage the risk of conflicts of interest resulting from the revolving door, and lobbying-related bribery and corruption. It should also review the lobbying activities and positions of its trade association and industry policy groups at Board (or equivalent) level. Finally, Mars should also provide trainings for both internal and external lobbyists regarding its policies to ensure consistent positions and actions.
- **Disclosure:** Mars should disclose more information about its lobbying on the health topics discussed on its Policies and Practices webpages, describing its specific lobbying positions (and the public health interest justifications for the positions), the specific legislations / measures it has engaged with. More generally, Mars should extend disclosures on its lobbying activities and expenditures beyond markets where it is required to do so by transparency registers. Where such positions and/or activities are undertaken via third-parties on the company's behalf, this should be clearly communicated on the company's public domain, to enable stakeholder scrutiny. The company should further consider reviewing and disclosing the main purpose of each membership and principal activities carried out by its trade associations and industry groups, as well as the exact amounts of membership dues used for lobbying purposes.

Spotlight on Lobbying 2022 | Mars



#	Score per indicator for Mars	Company score	Average score*
Policy commitments: 15 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	3.3	1.8
4	Political donations	10.0	3.6
5	Codes of conduct to prevent bribery & corruption	1.6	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: 2.5 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	2.5	6.1
Disclosure: 30.9 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.	0.0	0.7
21	Other policies to improve public health and diets.	6.5	2.0
22	Disclosure of key lobbying information	0.6	2.0
23	Memberships of trade associations	5.0	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	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: 48.4 / 350		48.4	