



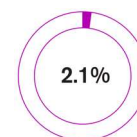
# Meiji

**Score: 6.5% | Rank: 21<sup>st</sup>**

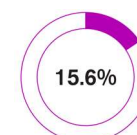
Meiji has an overall score of 6.5% and ranks 21<sup>st</sup> amongst the 25 evaluated companies. It ranks 17<sup>th</sup> in Management systems, 22<sup>nd</sup> in Disclosure, and 24<sup>th</sup> in Policy commitments. There is therefore considerable room for improvement across all sections.

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

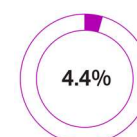
**Policy Commitments**



**Management Systems**



**Disclosure**



## Elements in Place

- **Policy commitments:** Meiji commits to prevent bribery and corruption in general, but it is unclear whether the ABC covers lobbying activities.
- **Management systems:** Meiji's Compliance & Risk Management Committee is responsible for implementing the ABC policy and a program of Governance audits run by external experts to ensure compliance with the policy. The audits cover a wide range of 'management risks', including anti-corruption, whistleblowing systems and risk management systems, but do not specifically relate to lobbying. Meiji also has a whistleblowing system, containing both an internal hotline and an external consultation desk staffed by qualified, independent professionals.
- **Disclosure:** Meiji a list of trade association memberships in Japan on its 'Collaboration' webpage, indicating the Board seats (and similar) held on each, as well as a description of the purpose and activities of several key industry initiatives, including the International Dairy Federation. It also publishes the number of reports made through its whistleblowing system.

## Recommendations for improvement

- **Policy commitments:** Meiji 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. With respect to its anti-bribery policy, we recommend that Meiji explicitly extends it to cover interactions with public officials, provide guidance on gifts and examples of what constitutes bribery / corruption, and explain the processes to follow should one become aware of potential violations. Meiji should also consider committing to not make any political donations in all markets, or commit to disclose any donations made on its own domain. Lastly, the company is also recommended to commit to lobby in support of government policy measures to align with SDGs 2 and 3, the WHO Global Action Plan for the Prevention and Control of NCDs 2013-2030, and/or commitments made at UNFSS.



- **Management systems:** Meiji should 1) assign to the Board oversight over the company's interactions with governments, including positions on key government policies, and its lobbying policy (once developed), 2) name an executive / function with responsibility for implementation of the policy, 3) and clarify control mechanisms such as regular Board reporting. The company is also recommended 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. Regarding the whistleblowing system, the company should provide clear process for following up on and tracking progress of complaints reported on its Compliance' website.
- **Disclosure:** Meiji is recommended to disclose all trade associations it is a member of in other markets (or state there are none), and indicate the amount it pays in dues for each one (and, ideally, the portion of dues used specifically for lobbying purposes). The company is also recommended to disclose information about its efforts to influence nutrition-related policies in Japan (and elsewhere), including what policies it lobbied on, what its position was, the nature and frequency of interaction with government officials, and any relevant documents (such as consultation submissions). Finally, Meiji should disclose further details about the use of its whistleblowing system, such as the number of cases resolved and breakdowns by issue type and geography.



#	Score per indicator for Meiji	Company score	Average score
<b>Policy commitments: 1.67 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	1.7	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: 12.5 total / 80 maximum</b>			
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	7.5	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	5.0	6.1
<b>Disclosure: 8.4 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	0.0	2.0
23	Memberships of trade associations	5.0	3.2
24	Activities undertaken by trade associations	0.9	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)	0.0	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	2.5	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
<b>Total: 22.6 / 350</b>			