



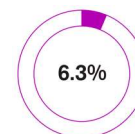
# China Mengniu

**Score: 5.0% | Rank: 23<sup>rd</sup>**

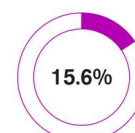
Mengniu has an overall score of 5% and ranks 23<sup>rd</sup> amongst the 25 evaluated companies. Mengniu has considerable scope for improvement across all sections – Policy commitments (12<sup>nd</sup>), Management systems (17<sup>th</sup>) and especially Disclosure (24<sup>th</sup>). The company has 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 still has significant room for improvement across all areas.

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

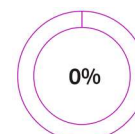
**Policy Commitments**



**Management Systems**



**Disclosure**



## Elements in Place

- **Policy commitments:** Mengniu's Anti-Bribery agreement must be signed by third parties, provides reporting guidelines and an explanation on what constitutes gifts.
- **Management systems:** Mengniu has limited management systems to enforce its ABC policy and whistleblowing mechanisms. For example, the company has a Discipline (Ethics) Inspection Committee, which conducts internal reviews and investigates reported cases. It also has a whistleblowing system prominently displayed on the company website.
- **Disclosure:** No information found in the public domain.

## Recommendations for improvement

- **Policy commitments:** Mengniu is recommended to extend its anti-bribery and corruption (ABC) policy to explicitly cover interactions with government officials and policymakers with the aim of influencing policy. Mengniu 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. Mengniu should also commit either to not make any political donations, or disclose all those it makes.
- **Management systems:** Mengniu should add descriptions of the payment / gifts pre-approval and record-keeping processes and consequences of potential violation in its ABC policy. Mengniu 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. The company is also encouraged to develop a policy regarding the hiring of former government officials and

## Spotlight on Lobbying 2022



policymakers to limit potential conflicts of interest, such as 'cooling off' periods and adapting job specifications and employment contracts to include specific restrictions.

- **Disclosure:** Mengniu is recommended to disclose information about its interactions with government officials and policymakers with the aim of influencing policy, including what policies it has lobbied on, what its positions were, and who it interacted with. It is also encouraged to disclose its trade association memberships, and any spending on lobbyists, trade associations, or political donations in China and any other markets they have been made.

## Spotlight on Lobbying 2022



#	Score per indicator for Mengniu	Company score	Average score
<b>Policy commitments: 5.0 total / 79.9 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	5.0	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: 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	5.0	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	7.5	6.1
<b>Disclosure: 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	0.0	2.0
23	Memberships of trade associations	0.0	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)	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	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
<b>Total: 17.5 / 350</b>			