



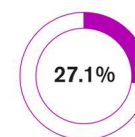
# Mondelez

**Score: 30.5% | Rank: 6<sup>th</sup>**

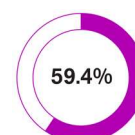
Mondelez has an overall score of 30.5% and ranks 6<sup>th</sup> amongst the 25 evaluated companies. Mondelez strongest area relative to its peers was Management systems (4<sup>th</sup>), followed by Disclosure (7<sup>th</sup>) and Policy commitments (8<sup>th</sup>)

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

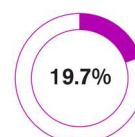
**Policy  
Commitments**



**Management  
Systems**



**Disclosure**



## Elements in Place

- Policy commitments:** The Mondelez Employee Code of Conduct requires employees to “deal honestly with the government”, as well as a specific ‘Policy Against Corruption and Bribery’, both of which apply to third parties who lobby on the company’s behalf. Meanwhile in its ‘Interacting With Government Officials’ policy, it stipulates that staff are responsible for ensuring that these third parties understand the company’s policies, and that they must follow the company’s ‘Third Party Due Diligence Procedures’.
- Management systems:** Mondelez states that the Governance Committee of the Board oversees the company’s lobbying positions, lobbying activities, and political contributions, and the company reports its lobbying activities to the Committee on an annual basis.<sup>1</sup> The company also has management systems to monitor and ensure adherence to its anti-bribery and corruption (ABC) policy, implemented by a dedicated global Compliance team, and regular audits are conducted by the Audit Risk & Advisory team covering ABC. Meanwhile the process for payment and gift pre-approval and record-keeping and the consequences of violating its ABC policy are provided. Moreover, Mondelez has processes to inform and train its internal and external lobbyists, investigate and sanction potential breaches, and outline how the company approaches misalignment between the trade associations’ lobbying positions and its own. Mondelez also has management systems to track and enforce adherence to its policy on political donations (in its Interacting With Government Officials policy).
- Disclosure:** In its ‘2021 Focus of US Advocacy’ document, Mondelez lists the main areas of focus of its lobbying in the US, which includes “Consumer Health and Food Safety Issues”, “Nutrition Policy”, and “Labeling Rules”, among other topics. For the US, the company annually discloses a list of trade associations to which it pays \$50,000 or more in dues, and specifies the specific portion that is spent on lobbying.

<sup>1</sup> <https://www.mondelezinternational.com/Investors/Corporate-Governance/Board-Oversight-of-Corporate-Citizenship>



## Recommendations for improvement

- **Policy commitments:** Mondelez is recommended to improve its 'Interacting With Government Officials' policy by integrating the OECD Principles for Transparency and Integrity in Lobbying and/or the Transparency International Standards for Lobbying Regulation. Moreover, it is strongly 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 to ensure that its lobbying aligns with governments policy efforts to meet SDGs 2 and 3, and the WHO Global Action Plan for the Prevention and Control of NCDs 2013-2030. Finally, Mondelez should commit to disclose all political donations made in all markets (on its own domain).
- **Management systems:** Mondelez is recommended to expand Governance Committee of the Board's responsibilities to include systematic reviews of its trade association memberships, to ensure alignment with the company's lobbying positions and policies. Moreover, Mondelez should implement measures to address potential conflicts of interest resulting from the revolving door, for example protocols to evaluate potential hires, cooling-off periods, applying restrictions through adapting job specifications, and provide compulsory compliance training. Regarding its whistleblowing system, Mondelez should provide clarity on the process for following up on complaints and tracking progress. Finally, Mondelez should consider commissioning periodic audits to review the alignment of its lobbying activities with its policies, and to assure its lobbying disclosures.
- **Disclosure:** Mondelez is strongly encouraged to elaborate on the topics disclosed in its '2021 Focus of US Advocacy' document, providing clarity on the specific topics (they are currently extremely broad), its positions in relation to these topics, and the specific bills and government bodies it has engaged with. More generally, Mondelez should extend disclosures on its lobbying activities and expenditures beyond markets where it is required to do so by transparency registers. Mondelez is also recommended to expand its disclosure of trade association memberships, not only by lowering the threshold for disclosure to at least \$10,000, but also by disclosing its memberships in other markets.

## Spotlight on Lobbying 2022 | Mondelez



#	Score per indicator for Mondelez	Company score	Average score
<b>Policy commitments: 21.7 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	1.7	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	10.0	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: 47.5 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	10.0	2.4
13	Controls over membership of associations/organizations	5.0	2.4
14	Controls over lobbyists to ensure that they understand and adhere to the company's policies	10.0	2.3
15	Auditing	0.0	0.1
16	Whistleblowing mechanisms	5.0	6.1
<b>Disclosure: 37.4 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.	2.3	1.8
20	Influencing national dietary guidelines.	0.0	0.7
21	Other policies to improve public health and diets.	2.8	2.0
22	Disclosure of key lobbying information	0.6	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	0.0	0.1
26	Expenditures on trade associations	5.0	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	5.0	2.7
32	Other disclosures	0.0	0.4
33	External stakeholder engagement	0.0	0.3
34	Disclosure of lobbying policy	7.5	4.5
35	Main disclosure regarding lobbying activities/expenditures	4.0	3.0
<b>Total: 106.6 / 350</b>			