



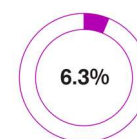
Tingyi

Score: 4.1% | Rank: 25th

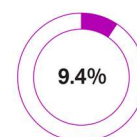
Tingyi has an overall score of 4.1% and ranks 25th amongst the 25 evaluated companies. Tingyi is yet to adopt responsible lobbying practices across Policy commitments, Management systems, or Disclosure.

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

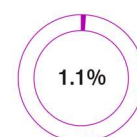
Policy Commitments



Management Systems



Disclosure



Elements in Place

- **Policy commitments:** On its Contact page, Tingyi commits that it “will never allow corruption and any form of fraudulent behavior” for anyone acting on behalf of the company.”
- **Management systems:** Tingyi assigns a functional responsibility for implementing its ABC policy to its Audit Department. It also has a whistleblowing system that is easily accessible on the company website via its Contact page. The company’s Sustainability report states that the Audit Department is ‘involved’ in implementing the Whistleblowing protocols and handling of reported cases but does not provide further details.
- **Disclosure:** Tingyi states in its 2021 Annual report that it participated in the development of ‘a number of standards by the China Institute of Food Science and Technology/China Beverage Industry Association, State Administration for Market Regulation and China National Centre for Food Safety Risk Assessment (CFSA)’ but does not provide further details of the specific standards and its participation.

Recommendations for improvement

- **Policy commitments:** Tingyi should publish a more detailed anti-bribery and corruption (ABC) policy which provides specific guidance on anti-bribery and corruption practices, including guidance on gifts and examples of what constitutes bribery / corruption. It is also encouraged to develop (and/or publish) a lobbying policy or code of conduct for employees (and third-parties) who interact with government officials and policymakers with the aim of influencing policy, taking inspiration from the OECD Principles for Transparency and Integrity in Lobbying and/or the Transparency International Standards for Lobbying Regulation. Tingyi should also commit either to not make any political donations, or disclose all those it makes.
- **Management systems:** The company should improve its ABC by elaborating on the Audit Department’s involvement in monitoring compliance, descriptions of the payment / gifts pre-approval and record-keeping processes, as well as the consequences of violations of its policy. Tingyi should also make its whistleblowing system more transparent by publishing information on the process of following up on reported cases and publicly communicating the system to



employees via training and onboarding. Furthermore, Tingyi should assign clear responsibility to the Board, supported by regular reporting, to oversee the company's lobbying, such as reviewing its lobbying policy, positions, and reviewing its trade associations. The company is also encouraged to develop a policy regarding the hiring of former government officials and policymakers to limit potential conflicts of interest, such as 'cooling off' periods and adapting job specifications and employment contracts to include specific restrictions.

- **Disclosure:** In addition to disclosing the Policy commitments and Management systems recommended above, Tingyi is encouraged to increase its transparency about its interactions with government officials and policymakers to influence policy. While it does mention some specific policies it has engaged with, it is recommended to disclose greater detail about this interaction, such as what the company's positions were, and who was involved. More broadly, Tingyi could publish what its main policy priorities are, its positions on these topics, and its lobbying activities on these topics. 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 | Tingyi



#	Score per indicator for Tingyi	Company score	Average score*
Policy commitments: 5.0 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	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
Management systems: 7.5 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	2.5	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
Disclosure: 2.0 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.	0.0	1.8
20	Influencing national dietary guidelines.	0.0	0.7
21	Other policies to improve public health and diets.	2.0	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
Total: 14.5 / 350		14.5	