



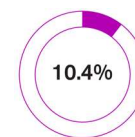
Yili

Score: 5.2% | Rank: 23rd

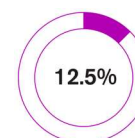
Yili has an overall score of 5.2% and ranks 23rd amongst the 25 evaluated companies. Beyond an anti-bribery and corruption policy, Yili is yet to adopt responsible lobbying practices across Policy commitments, Management systems, or Disclosure.

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

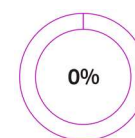
Policy Commitments



Management Systems



Disclosure



Elements in Place

- **Policy commitments:** Yili's anti-bribery and corruption (ABC) commitments can be found in its Business Conduct Standard, which contains guidance on gifts, applies to third-parties, and provides a clear reporting process.
- **Management systems:** Yili's Commission for Discipline Inspection is responsible for implementing its ABC policy, and compliance with the policy is audited, according to the company's Sustainability report. The company also has a whistleblowing mechanism on its website.

Recommendations for improvement

- **Policy commitments:** Yili is encouraged to develop (and/or publish) a responsible 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. Yili should also commit either to not make any political donations, or disclose all those it makes in all markets.
- **Management systems:** The company should improve its ABC by elaborating on the Commission for Discipline Inspection'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. Yili 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, Yili 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.

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- Disclosure:** In addition to disclosing the Policy commitments and Management systems recommended above, Yili 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. More broadly, Yili 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.

#	Score per indicator for Yili	Company score	Average score
Policy commitments: 8.4 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

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4	Political donations	0.0	3.6
5	Codes of conduct to prevent bribery & corruption	8.4	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: 10.0 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	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	5.0	6.1
Disclosure: 0.0 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.	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
Total: 18.4 / 350			