Danone Policy on Advocacy (lobbying)

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Danone Policy on Advocacy (Lobbying)

1. Introduction

This policy applies to Danone employees, employees of all companies controlled by Danone and employees of all agencies working on behalf of Danone who are engaged in contact with government authorities and policy makers -- an activity often referred to as lobbying or advocacy.

Although there is no universally agreed definition of lobbying, the UK House of Commons Public Administration Select Committee has concluded that "The practice of lobbying in order to influence political decisions is a legitimate and necessary part of the democratic process. Individuals and organizations reasonably want to influence decisions that may affect them, those around them, and their environment. Government in turn needs access to the knowledge and views that lobbying can bring."

2. Policy

2.1 General

In certain countries, lobbying activities are regulated by law. In others, there may be established processes specifying principles of "good practice" or requiring organizations involved in lobbying to provide certain details to a central register. This is the approach now being introduced by the European Commission and the European Parliament.

Wherever such measures or government policies exist, Danone and its employees will comply with them in full.

Where there are no such rules, guidelines or policies, Danone employees will, at minimum, abide by the principles described in the present Charter at all times.

2.2 Trade associations

Danone employees playing an active role as members of a trade association -- sector-based, national or international -- must have sufficient seniority and authority to participate actively in discussions within the association. They will need to exercise their own judgment on behalf of the company, for example in remaining neutral on an issue when this is in the best interests of the association and not detrimental to Danone. However, they must voice opposition within the association to any position that is potentially damaging to the interests of either Danone or its customers. When representing the trade association in meetings with government officials or policy makers, Danone employees must also make it clear that they are Danone employees and not employees of the association whose views they are representing.

Information concerning Danone's membership of trade associations and specific position papers given by Danone to government authorities or policy makers will be made available on request.

2.3 All other organizations

Danone employees representing Danone in any other organizations, including any ad hoc group of companies, must ensure that such organizations operate transparently and comply fully with national and international laws and regulations at all times, and in particular with any and all laws relating to competition and anti-trust behavior.

3. Key principles: openness & integrity

Whenever Danone employees are in direct contact with government officials and policy makers, they must clearly describe their role within Danone .

In their relationships with government officials and policy makers, Danone employees will act in an honest and honorable way at all times. They will ensure that the information they impart is correct and accurate, and is presented in a way that does not mislead. Whenever they share information that is an opinion rather than hard facts, they must make this perfectly clear to the recipient of the information. Employees will never use dishonest means to obtain information or a decision, nor will they induce government authorities or any other officials to violate applicable rules and standards of behaviour.

4. Authorization

Danone employees and agencies acting on their behalf will not share views, information and facts concerning Danone with government officials and policy makers unless they are authorized to do so by the appropriate Danone entity.

The contents of this document will be assessed every three years to determine whether an update is necessary.