

# **DANONE POLICY ON ADVOCACY**



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# 01 DANONE'S VISION OF ADVOCACY

## HOW WE DEFINE ADVOCACY AND WHY IT IS IMPORTANT FOR DANONE

For over fifty years, Danone has advocated that businesses need to take responsibility for the impact they have on society and their ecosystem. As early as 1972, our founder Antoine Riboud outlined the fundamental interdependence between performance and sustainability in a pioneering speech – which became Danone's "dual project". Today, as the responsibility of business is under scrutiny like never before, we continue to act and advocate, convinced that companies can and should contribute to positive change.

We believe companies like ours can use our reach and scale for positive impact, creating both shareholder and stakeholder value. If we are honored a seat at the table, we can provide our expertise for more informed decision-making, in a collaborative and transparent environment with decision-makers and other relevant stakeholders.

Danone believes that the purpose of advocacy is to build common ground, driving engagement and action between stakeholders with a view to developing common solutions to some of the challenges facing our society. This is in line with the UK House of Commons Public Administration Select Committee's views on the topic<sup>1</sup>: *"Lobbying is essentially the activity of those in a democracy making representations to government on issues of concern. The Government is committed to protecting this right from improper use while at the same time seeking to avoid any unnecessary regulation or restriction. As well as being essential to the health of our democracy, its free and proper exercise is an important feature of good government. Those who work within government should have no monopoly on the advice that Ministers use to make their decisions. The more individuals and groups outside government engage with the policy-making process and the broader the base of advice and evidence used to take decisions, the better those decisions tend to be."*

We have a shared interest – and responsibility – in finding solutions to the public health, social and environmental challenges the world is currently facing. Our business will not succeed if we don't work with policymakers and engage with other stakeholders in our common mission to bring health through food to as many people as possible. We cannot deliver and share growth sustainably if we cannot source the ingredients we need, or if the communities we operate in are struggling. Our business success depends clearly on our ability to meet society's expectations.

To ensure that we can work collectively with others to have a positive impact on public health, social and environmental challenges – and to retain our seat at the table – we fundamentally believe in the importance of accountability, integrity and responsibility in our advocacy activities.

<sup>1</sup> Cf. the UK House of Commons Public Administration Select Committee's report on "Lobbying: Access and influence in Whitehall: Government Response to the Committee's First Report of Session 2008–09", <https://publications.parliament.uk/pa/cm200809/cmselect/cmpubadm/1058/1058.pdf>

We are committed to sustainable lobbying and advocacy practices that:

- Recognize the central role of governments in policymaking.
- Support an inclusive and democratic process for decision-making, recognizing and supporting others' ability and right to advocate and participate.
- Respect lobbying legal frameworks and codes of conducts of the countries we operate in.
- Support evidence-based policymaking based on peer-reviewed science – in our work, we look for consensus scientific positions and expert panel opinions.
- Respect planetary boundaries – in accordance with the objectives laid out in our sustainability strategy, the Danone Impact Journey, as well as our commitments under our status as a “*Société à Mission*” and a growing B Corp.

We are convinced that, when done with integrity and accountability, corporate advocacy can help support good policymaking and lead to improved outcomes for all stakeholders. This is why, beyond respecting lobbying legal frameworks and codes of conducts in the countries we operate in, we advocate and strive for higher transparency and accountability standards.

## 02 DANONE'S ADVOCACY IN ACTION

### 2.1. WHO THIS POLICY APPLIES TO

This policy applies equally to all Danone employees of all companies controlled by Danone's affiliates and subsidiaries, as well as to contracted partners who conduct lobbying, influence or advocacy and who are in contact with authorities, organizations and policymakers worldwide on behalf of Danone.

Nothing in this policy shall however be construed as limiting the ability of Danone employees to exercise their rights to express their personal opinions, or support, financially or otherwise, the political candidates of their choice in accordance with Danone's Code of Business Conduct.

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

This policy is part of a continuous learning process, built on our experience since we published our first advocacy policy in 2011.

The content of this policy will be reviewed and updated as and when required.

#### **Avoiding conflicts of interest for public sector recruitment**

When recruiting employees from the public sector, Danone ensures that the right balance is struck between the benefits from such recruitment and avoiding potential conflicts of interest with previous employer(s). As such, when hiring an employee from the public sector, Danone will follow the company procedures for handling conflicts of interest and commits to:

- carefully review each individual situation with regards to the new position and previous responsibilities of the employee in the public sector to avoid any potential conflicts of interest.
- check any existing contractual confidentiality and restrictive covenants and to comply with those covenants, if any.
- check any existing prohibitions stemming from an individual's ethic commitment under a previous government position and to comply with those commitments, if any.
- when circumstances require, adapt/restrict the job of the employee coming from the public sector for a certain period of time. The restriction could consist of forbidding the new employee to contact his/her former colleagues for a defined period of time for professional reasons.

### 2.2 ADVOCACY AND OUR STAKEHOLDERS

When referring to lobbying, influence or advocacy activities, Danone interacts with various stakeholders including governments and regulators, scientific societies, trade associations, experts, non-governmental organizations (NGOs) and other businesses (both in and out of the food sector).

It is indeed our conviction that policy-shaping no longer belongs solely to politics but includes a wide range of actors. Our dialogue with this multitude and variety of stakeholders helps us to build comprehensive positions and implement pertinent solutions with impact.

On top of regular conversations with these stakeholders, we conduct a periodical materiality assessment<sup>2</sup> that helps us refine our understanding of their needs and interests, and therefore better define and address key challenges.

## 2.3 TOPICS WE ADVOCATE ON

Danone participates in policy development as a company or industry member in order to fulfill its mission of “bringing health through food to as many people as possible”.

All key topics we engage on are captured in our materiality assessment<sup>3</sup>. Our participation in policy discussions is varied, covering macro-topics like agriculture, circular economy or climate change, through to more detailed topics such as information to consumers, nutritional care as part of cancer care or product quality and safety standards. We proactively publish many of our policies and external positions on topics on our advocacy agenda, as well as consultation inputs to authorities or policymakers, made available on Danone’s website.

### **Sustainability and Climate**

We advocate and partner with others on several sustainability topics which are fundamental to our business’ long-term success and to people, society and the environment.

This includes climate change, regenerative agriculture, watershed preservation and restoration, circular economy and waste reduction.

We are committed to conducting our advocacy in line with the Paris Agreement and in line with our climate policy goals outlined above, notably to restrict global temperature rise to 1.5C. Our 2023 [Position on Climate Advocacy](#) sets out our commitments, public policy positions and governance on this important issue.

### **Nutrition and Health**

We are committed to lobbying only in support of measures to improve health and nutrition, consistent with the public interest and nutrition. We want to and can have a positive impact on nutrition and health, helping to meet public health goals (including tackling obesity, mal- or under-nutrition). Our products are consumed regularly by millions of people across the world. We are building on decades of research and scientific expertise to help consumers and patients maintain and support their health through nutritious food and sustainable healthier eating and drinking choices.

We support evidence-based policymaking based on peer-reviewed science, including for topics such as interpretive nutritional labelling and fiscal health measures.

<sup>2</sup> According to the [Global Reporting Initiative \(GRI\)](#), ‘materiality’ are “those topics that have a direct or indirect impact on an organization’s ability to create, preserve or erode economic, environmental and social value for itself, its stakeholders and society at large”. A materiality assessment is thus a method to identify and prioritize the issues that are most important to an organization and its stakeholders.

<sup>3</sup> Danone’s materiality matrix is published in the company’s annual Reference Document, also available on [www.danone.com](http://www.danone.com)

## Infant and Maternal Health

As part of its Specialized Nutrition business, Danone is specifically committed to the health and nutrition of mothers and infants from the youngest age. Most importantly, we support the World Health Organization's view of the importance of breastfeeding for infant health, namely the nutritional recommendation for exclusive breastfeeding for the first six months of age and continued breastfeeding up to two years and beyond, combined with the safe introduction of appropriate complementary foods. We believe Danone has a role to play in supporting this recommendation while empowering parents and caregivers to make informed feeding decisions for their babies. Having researched the science of breastmilk and breastfeeding as well as its benefits for the health of both mother and child for over 50 years, we are convinced that breastfeeding gives babies the best nutritional start in life.

We are thus committed to fostering a proactive, constructive and evidence-based dialogue supporting breastfeeding around the world – not undermining public policy frameworks that serve this purpose – while endorsing the principles of openness, transparency and integrity in our advocacy activities. Danone is indeed decided to support the design and implementation of advocacy initiatives in every country where it operates that will contribute to creating an environment where all parents feel informed and supported on all questions of infant nutrition. As this is a shared goal, we aim to work with the UN, governments, civil society organizations, as well as paediatric / medical societies to develop an evidence-based, shared policy agenda focused on increasing breastfeeding rates, supporting parents and the improved nutritional health of infants and mothers. We are ready to take a leadership role, mobilizing industry engagement. As a first step we will support the adoption, implementation and, critically, enforcement of national legislation to meet the needs of each market in line with the above nutritional commitments and commitments, to create a level-playing field.

## Higher transparency and accountability advocacy standards

Danone also works across the industry, governments, and civil society to promote and support higher transparency and accountability standards around advocacy. In particular, Danone supports the International Food & Beverage Alliance's [Guiding Principles for Multi-stakeholder Engagement](#). These principles, developed in May 2019, include mutual & shared benefit; environment of integrity, respect and trust; and accountability and transparency, amongst others.

Danone is part of the [OECD Trusted Dialogue on Getting Influence Right](#) developed as part of the *Global Initiative to Galvanize the Private Sector as Partners to Combat Corruption*. This dialogue brings together a diverse community of government and business representatives to discuss key political engagement challenges facing relevant sectors, identify core principles of responsible corporate political engagement, and develop implementation guidelines on responsible political engagement for the private sector.

Additionally, we exchange regularly with experts and NGOs on corporate political engagement to inform our positions and adopt best practice, including with the not-for-profit [The Good Lobby](#). We assessed our commitments and practices against The Good Lobby Tracker, the first systematic assessment of virtually all major corporate political responsibility reporting initiatives, from sustainability frameworks to ESG ratings.

## 2.4. CHANNELS WE USE FOR ADVOCACY

Danone's advocacy can take the form of stand-alone activities, engagement through trade associations or through multi-stakeholder coalitions.

### a) Danone stand-alone activities

This includes traditional bilateral or multilateral meetings or events that Danone organizes and/or attends with various stakeholders, with the objective of conveying its position on a given topic.

### b) Trade associations

Danone is a member of numerous trade associations, which can be industry sector-based or topic-based, at local, national<sup>4</sup>, regional or international levels. The company's participation varies also depending on our level of engagement (e.g. member of the Board of the trade association, involvement in a specific working group, etc).

Danone employees playing an active role as members of these trade associations must have sufficient seniority and authority to participate actively in discussions within the association. Particular care is given to their training to ensure that they comply with Danone's internal standards on trade association memberships, and most importantly do not engage into any anti-competitive activities. When representing the trade association in meetings with government officials or policymakers, Danone employees must also make it clear that they are Danone employees and not employees of the association whose views they are representing.

Danone will not tolerate any governance conflict of interest within its different trade associations' activities and is fully compliant with the competition law rules its trade associations are subject to.

We are conscious of the importance of alignment between our own public positions on topics and those of the trade associations we are a member of. As outlined in the Governance section of this policy, we have developed internal guidance and training for our teams to detect and address any occasions of misalignment.

In the spirit of transparency, we have published a list of Danone's memberships of trade associations, organizations, multi-stakeholder coalitions and business platforms which can be found in Appendix 1. This list is updated annually, and accurate to the best of our knowledge at the time of update.

### c) Multi-stakeholder coalitions

Our impact is collective. For over 50 years, since the launch of the Danone dual project, we have been working with and through a growing ecosystem of impact platforms and partners.

Multi-stakeholder coalitions bring together diverse parties united by a common vision and policy ambition, ensuring we are focused on the right issues and deploying our resources in the right ways to maximize the scale of impact.

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<sup>4</sup> In the United States for example, Danone is a member of both state-level trade associations, as well as US/federal-level associations.

We seek to build multi-stakeholder coalitions that:

- Are thematic, not sectorial
- Are inclusive, bringing together actors from all backgrounds (policymakers, peers and other businesses, NGOs, academia...)
- share a common policy ambition and drive business commitments
- have a flexible organization, which is not necessarily formalized into a legal entity.

Examples of multi-stakeholder coalitions built by Danone include the [Food Reform for Sustainability and Health \(FReSH\)](#), the [One Planet Business for Biodiversity](#) coalition, the [Business for Inclusive Growth Platform \(B4IG\)](#). Danone is also engaged in multi-stakeholder coalitions around circular economy, including the Global Commitment on Plastics, spearheaded by the Ellen MacArthur Foundation in collaboration with the United Nations Environment Program, and the [Business Coalition for a Global Plastics Treaty](#), convened by the Ellen MacArthur Foundation and WWF, in collaboration with aligned businesses and supported by strategic NGO partners.

Training targeted at employees carrying out advocacy is delivered to ensure that they comply with Danone's internal standards when interacting within multi-stakeholder coalitions, and most importantly do not engage in any anti-competitive activities and fully comply with all applicable anti-trust laws and regulations when and where they exist.

## 2.5. OUR PROFESSIONALS' BEHAVIOR

It is of great importance to ensure that our behavior doesn't undercut trust and the credibility of our company. When and where we engage in advocacy activities, this will therefore be conducted in a transparent, legitimate and ethical manner.

As is true for everything we do, any action undertaken in the context of advocacy activities must comply with Danone's Code of Business Conduct, Danone's Code of Conduct for Business Partners, Danone's Integrity Policy, Danone's Policy for the Marketing of Breast-Milk Substitutes, Danone's Health Care Systems (HCS) Policy and other relevant internal policies such as Danone's Competition Policy and Danone's Data Privacy Policy.

Furthermore, any lobbying or advocacy activity conducted by Danone employees, or agencies or consultants working on behalf of Danone, must fully comply with all applicable national and international laws and regulations at all times, and in particular with any and all laws relating to competition and anti-trust behavior. Where local laws and regulations are less stringent than the above policies, the company policies always prevail.

Whenever Danone employees are in direct contact with government officials and policymakers, they must clearly describe their role within Danone. In their relationships with government officials and policymakers, Danone employees will act in an honest, fair and transparent way at all times using good judgement and common sense. They will ensure that the information they impart is correct and accurate and is presented in a way that is not misleading. Whenever they share information that is an opinion rather than hard facts, they 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 behavior.

Employees must also act with integrity at all times. Never must they, neither directly or indirectly or through intermediaries, offer or promise any personal or improper financial or other advantage to an official of a government, a government-controlled entity or any other relevant key opinion leader, as well as their families, for the purpose of obtaining information or influencing decision-making. Moreover, Danone employees must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct or the attempt thereof. On the contrary, employees should foster an open dialogue and convince by using factually accurate information, compelling evidence and robust arguments.

Further information can be found in [Danone's Business Code of Conduct](#), [Danone's Code of Conduct for Business Partners](#), [Danone's Integrity policy](#), [Danone's Policy for the Marketing of Breast Milk Substitutes](#), and [Danone's Health Care Systems \(HCS\) policy](#).

## 2.6. GOVERNANCE OF OUR ADVOCACY

Danone's Public Affairs and Compliance Departments are co-responsible for overseeing the worldwide implementation of our company's advocacy policies. Local Public Affairs managers are held accountable for their advocacy activities. Regular trainings are rolled-out by both the compliance and public affairs teams to ensure professionals are trained on the practice of advocacy, and that they understand and apply our advocacy goals and positions on specific topics. Advocacy is under the governance of Danone's General Secretary, part of Danone's leadership team and member of the Executive Committee.

All group policies and positions, including on topics around health, environment and social, are reviewed by the Corporate Policies and Positions Committee, which meets bi-monthly under the leadership of the General Secretary and the Chief Research, Innovation, Quality and Food Safety Officer. An update on all of our policies on health, environment and social issues is presented annually at the CSR Committee, which is a specialized Committee of the Board.

Advocacy and engagement activities are reviewed by the Global Engagement Committee, which brings together representatives of investor relations, sustainable finance, communications, public affairs, legal and sustainability on a bi-monthly basis.

Danone follows the principles of the [AA1000 Stakeholder Engagement Standard](#) to structure its stakeholder engagement. This methodology is known and shared with all Danone global, regional and local Public Affairs professionals.

### **Compliance controls and Due Diligence**

Practical controls are carried out by the Compliance function and by Danone's internal audit team independently as per DICE (the Danone Internal Control Evaluation framework) and reported in DanGo (the Danone Governance & Operating Tool).

Third parties used in the course of advocacy campaigns, such as Public Affairs consultants, must be approved and administered in compliance with Danone's internal Third-Party Vetting rules. Advocacy is identified as high risk and third parties within this category are subject to additional due diligence and compliance review.

## Stakeholder governance

Stakeholder governance is creating a structure that is more amenable to building value for all stakeholders over the long term through dialogue, enhanced accountability and transparency. The stakeholder governance model is a key aspect of B Lab's vision for sustainable and future-proof businesses, one that Danone shares. It enables companies to collect and listen to concerns and feedbacks from their partners, ensuring all voices are heard and taken into consideration in the decision-making process. At Danone, we believe that a robust stakeholder governance makes us stronger, more resilient and responsible as a business. We seek feedback from stakeholders when developing policies, positions and commitments on key topics, for example on climate change or human rights. This feedback informs our positions and action plans, which are regularly discussed and reviewed by Danone's executive leadership. This belief in the importance of creating shared value and building collective action with stakeholders is also why we became a "*Société à Mission*" and are working to become a B Corp.

## Governance through B Corp™ and our "*Société à Mission*" Status

As part of its objective to become fully certified B Corp™ by 2025, Danone's subsidiaries are currently individually undergoing the rigorous and independent [B Impact Assessment](#), a thorough questionnaire evaluating how their operations and business model impact their workers, governance, community, environment, and customers<sup>5</sup>. Among the topics assessed, Danone's advocacy practices are examined carefully and credit is awarded for efforts to advocate for improved social and environmental standards and policy.

Danone's adoption of the status of a "*Société à Mission*"<sup>6</sup> in June 2020 also required specific bylaws on our health, social and environmental goals and a new governance framework to monitor the execution of such goals. Danone's independent Mission Committee, composed of eight highly qualified experts, mainly from international organizations, and including one independent Director and one employee, is responsible for reviewing the company's progress towards statutory key health, social and environmental objectives. Every year, its report is presented at Danone's annual general meeting. An audit of progress is also conducted every two years by an independent third party and published within the Mission Committee's report.

More specifically, when it comes to Specialized Nutrition, every year Danone engages with qualified third-party experts to undertake external audits on compliance with its Policy for the Marketing of Breast-Milk Substitutes and publishes their results<sup>7</sup>. Any allegation of potential non-compliance is centrally logged, followed-up until closure and allegation reports published on Danone's website<sup>8</sup>. Danone is also proud to be included in the FTSE4Good Index Series. FTSE Russell (the trading name of FTSE International Limited and Frank Russell Company) confirms that Danone has been independently assessed according to the FTSE4Good criteria and has satisfied the requirements to become a constituent of the FTSE4Good Index Series.

<sup>5</sup> More information on Danone's B Corp certification journey in the company's Universal Registration Document:

<https://www.danone.com/investor-relations/publications-events/registrations-documents.html>

<sup>6</sup> Introduced in France in 2019 with the "Pacte" law, a "*société à mission*" is defined as a company whose purpose and whose social, societal and environmental objectives are set out in its Articles of Association. Danone is the first listed company to have adopted such a status.

<sup>7</sup> The reports are published on this webpage: <https://www.danone.com/brands/specialized-nutrition/supporting-breastfeeding.html>

<sup>8</sup> Idem, the reports are published on this webpage: <https://www.danone.com/brands/specialized-nutrition/supporting-breastfeeding.html>

## Danone Policy on Political Contributions

Danone does not engage in political contributions to political parties, elected representatives and political candidates seeking office, or associations or foundations owned or controlled by such. This includes prohibiting donations, loans, sponsorships, retainers or purchase of tickets/events. It also includes a ban on in-kind contributions including goods and services such as advertising, use of facilities, design and printing, and donation of equipment. Beyond not making any political contributions, Danone does not support political parties, candidates or any groups that promote a political party's interests in any other form.

Compliance is ensured via DICE (the Danone Internal Control Evaluation framework) where donations are monitored and controlled annually by internal control and subject to internal audits on a periodic basis. All donations are subject to our Integrity Policy, HealthCare Compliance Policy and our Third-Party Vetting Policy, with any donations classified as 'high risk' undergoing compliance review.

## Advocacy expenses

Danone's contributions and spendings for lobbyists or lobbying organizations, trade associations and other tax-exempt groups<sup>9</sup> are managed at the different levels of the company (both locally by the subsidiaries and at worldwide business unit level). There is therefore no full consolidation of the total spending at company level.

Danone's external reporting on advocacy expenses is subject to the local regulation in place, for example in Europe through the EU Transparency Register, in France through French High Authority for Transparency in Public Life ("*Haute Autorité Française pour la Transparence de la Vie Publique* – HATVP")'s, and in the United States through the US Lobbying Disclosure Act (LDA).

## Addressing misalignment to ensure positive collective action

As noted in the above advocacy and stakeholders' section, we work with a number of different partners – including trade associations – to have a greater impact through collective action. We recognize that such groups can be a strong catalyst for positive collective action, but also risk being a barrier to ambitious positions and commitments. As such, we are putting in place internal guidelines and training to help ensure alignment between our positions on key topics and those of our trade associations. This will cover internal guidance on governance of our trade association membership, rules governing our participation, and best practice to ensure alignment (for example, for a topic like climate change, ensuring there is alignment between the Paris Agreement, Danone's position and the trade association's position).

Our guidelines also advise on how to address any misalignment including: verbalizing our position, ensuring any disagreement is noted in the official minutes of the meeting, sending a formal letter to the Secretariat of the trade association outlining our position and the point of disagreement, and – if applicable – considering our own submission to a public consultation. We are also persuaded that continued dialogue and engagement with misaligned parties is fundamental in order to improve trade associations' positions and to create a positive movement to achieve positive policy outcomes.

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<sup>9</sup> For tax-exempt groups, we are here referring to donations from Danone or its brands to non-profit organizations that take part in advocacy. The donation itself will not likely support a specific activity or an expected service in return, but it will support general advocacy.

As part of our annual disclosure to the CDP, we already evaluate alignment between the Paris Agreement, our own advocacy and the advocacy of the trade associations and coalitions with the greatest influence over climate policy.

### **Addressing conflict of interest and whistleblowing**

Danone has a clear whistleblowing policy, part of its Compliance Framework Policy, which encourages all employees, anonymously if they wish, to raise a concern of any wrongdoing. [The Danone Ethics Line \(DEL\)](#) is available to anyone – employees, suppliers, or any third party – to report their concerns, anonymously, if necessary, via the web or phone hotline.

The scope of whistleblowing for Danone includes any alleged violations of our Code of Business Conduct, the Integrity Policy, any of our other Compliance Policies, including this Policy, or any non-ethical conduct. It also covers any unlawful behavior, financial malpractice and any activity which poses or is likely to pose a danger to the environment or to anyone working for Danone.

The Danone Ethics Line is accessible via the ‘Contact Us’ section of Danone’s corporate website and is available in 52 languages. The Danone Ethics Line is also communicated to all employees on an ongoing basis via posters, the intranet, the group’s policies and through a targeted communication campaign every year.

Should any Danone employee have a concern, they should promptly contact their supervisor / manager, HR, Finance and/or Compliance Manager or alternatively report on the Danone Ethics Line. Employees are encouraged to speak up, reassured that they can do so safely, confidentially and anonymously through the Danone Ethics Line. Raising a concern in good faith will not expose the person who raised it to any retaliation.

All concerns will be impartially and objectively examined and, if relevant, investigations, mitigation plans and sanctions are put in place under the governance of the Danone Ethics Line Committee and local management. This Committee is made up of the Chief Compliance Officer, Global Integrity Director, Global Head of Internal Audit, Global Human Resources Compliance and Labor Law Director, Global Compliance Director – Ethics Line and a senior representative from the Security function.

Mitigation plans can involve process improvements, disciplinary action, training and communication, and enhanced monitoring from the compliance team in the form of a steering committee responsible for overseeing the implementation of corrective measures.

Details on internal investigations are provided in the Internal Investigations Policy and the Internal Investigations Guidelines. Every year, Danone discloses the number of reports made through the Danone Ethics Line and also the type of violation category witnessed in its Registration Document<sup>10</sup>.

Danone has additional procedures in place to identify and mitigate conflict of interest. Procedures include employee disclosure which are reviewed by Human Resources and/or Compliance. If appropriate, mitigation plans are then put in place. When a conflict cannot be mitigated, the employee will be informed and asked to take necessary action.

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<sup>10</sup> Danone’s annual Registration Document is public and can be found here : <https://www.danone.com/investor-relations/publications-events/registrations-documents.html>

## 2.7. EXTERNAL REPORTING ON OUR PRACTICES

External reporting on advocacy is subject to the local regulation in place. Amongst others:

- Danone has signed the so-called “EU Transparency Register” (TR ID number: 65744846168-89) created through an Agreement between the European Parliament and the European Commission on the establishment of a publicly available transparency register for organizations and self-employed individuals engaged in EU policy-making and policy implementation. Registrants commit themselves to abide by a Code of Conduct covering all relations and contacts with the EU institutions.
- In France, the 2016 Sapin II Law on transparency, the fight against corruption, the modernization of the economy sets new standards of transparency and reporting, including the creation of a **national electronic register of representatives of interests with which Danone complies**.
- Lobbying in the United States is governed, at federal level, by the Lobbying Disclosure Act (LDA); each state may also have its own requirements and laws. The key elements of the LDA are included in the Appendix.

## 03 APPENDIX

### APPENDIX 1A: DANONE'S MEMBERSHIPS IN GLOBAL AND REGIONAL TRADE ASSOCIATIONS, MULTI-STAKEHOLDER COALITIONS AND BUSINESS PLATFORMS

*\*Forums where Danone is a Board Member*

#### **Global**

- B4IG – Business for Inclusive Growth
- BIAC – Business at OECD
- B Movement Builders
- Business for Nature
- CFA – Cool Farm Alliance
- CGF – Consumer Goods Forum\*
- Ellen McArthur Foundation
- GEDSA – Global Enteral Device Supplier Association\*
- Global Dairy Platform
- ICBWA – International Council of Bottled Water Associations\* (indirect membership)
- ICC – International Chamber of Commerce
- IDF – International Dairy Forum (indirect membership)
- ISDI – International Special Dietary Foods Industries\*
- MNI – Medical Nutrition International Industry\*
- OP2B – One Planet Business for Biodiversity\*
- OECD G7 SSCI – Sustainably Supply Chain Initiative
- SAI – Sustainable Agriculture Initiative Platform\*
- SBTN – Science Based Targets Network
- TNFD – Task Force on Nature-related Financial Disclosures
- TONZ – Transform to Net Zero framework initiative
- UN Global Compact
- We Mean Business
- WBCSD – World Business Council for Sustainable Development\*
- WFA – World Federation of Advertisers\*

#### **Regional**

- AFBA – ASEAN Food and Beverage\*
- AIM – European Brands Association\*
- APIYCNA – Asia Pacific Infant and Young Child Nutrition Association\*
- CPA – Circular Packaging Association\*
- EDA – European Dairy Association\* (indirect membership)
- EFDC – European Food & Drink Coalition\*
- ENSA – European Plant-Based Foods Association\*
- EUROPEN – European Organization for Packaging and the Environment
- EU ASEAN Business Council\*
- FEPALE – Federacion Panamericana de Lecheria (indirect membership)
- FIA – Food Industry Asia\*
- FDE – FoodDrinkEurope
- ILSI Europe
- ILSI NorAndino\*

- Latin American branch of the Consumer Goods Forum\*
- LABIP – The Lactic Acid Bacteria Industrial Platform\*
- MCBG – Multinational Companies Business Group)\*
- NMWE – Natural Mineral Waters Europe\*
- SNE – Specialised Nutrition Europe\*
- UAE Food & Beverages Manufacturers\*
- UNESDA – Union of European Beverages Association\*

## APPENDIX 1B: DANONE'S TRADE ASSOCIATION MEMBERSHIPS IN THE FIELD OF MATERNAL, INFANT & YOUNG CHILDREN NUTRITION (UPDATED DECEMBER 2023)

Here below a list of Danone trade association memberships in the field of maternal, infant & young children nutrition. When such a dedicated trade association does not exist, we have specified the overarching food association of which Danone is a member.

### International

- International Special Dietary Foods Industries (ISDI)
- Medical Nutrition International Industry (MNI)
- Global Enteral Device Supplier Association (GEDSA)

### Regional

|        |                                                                                                                         |
|--------|-------------------------------------------------------------------------------------------------------------------------|
| Asia   | <ul style="list-style-type: none"> <li>• Asia Pacific Infant and Young Child Nutrition Association (APIYCNA)</li> </ul> |
| Europe | <ul style="list-style-type: none"> <li>• Specialized Nutrition Europe (SNE)</li> </ul>                                  |
| Latam  | <ul style="list-style-type: none"> <li>• ILSI NorAndino</li> </ul>                                                      |

### Europe

|                |                                                                                                                                                                                                                                |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Austria        | <ul style="list-style-type: none"> <li>• Fachverband der Lebensmittelindustrie – Kindernährmittel</li> <li>• Arbeitsgemeinschaft für klinische Ernährung (AKE)</li> </ul>                                                      |
| Belgium        | <ul style="list-style-type: none"> <li>• Babynutrition.be</li> <li>• Bemedtech</li> </ul>                                                                                                                                      |
| Czech Republic | <ul style="list-style-type: none"> <li>• Association of Czech Branded Products</li> <li>• Czech Food Chamber</li> </ul>                                                                                                        |
| Finland        | <ul style="list-style-type: none"> <li>• Finnish Baby food association (part of Elintarvikeliitto, the Finnish Food and Drink Industries' Federation)</li> </ul>                                                               |
| France         | <ul style="list-style-type: none"> <li>• Syndicat Français de la Nutrition Spécialisée</li> <li>• Secteur Français des Aliments de l'Enfance</li> <li>• Syndicat National de l'Industrie des Technologies Médicales</li> </ul> |
| Germany        | <ul style="list-style-type: none"> <li>• Diätverband</li> </ul>                                                                                                                                                                |

## DANONE POLICY ON ADVOCACY

|             |                                                                                                                                                                                                                                      |
|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Greece      | <ul style="list-style-type: none"> <li>Federation of Greek Baby Food Industries (SEPTEDE)</li> </ul>                                                                                                                                 |
| Hungary     | <ul style="list-style-type: none"> <li>Magyar Dietetikusok Országos Szövetsége</li> </ul>                                                                                                                                            |
| Ireland     | <ul style="list-style-type: none"> <li>Dairy Industry Ireland (IBEC)</li> </ul>                                                                                                                                                      |
| Italy       | <ul style="list-style-type: none"> <li>Unione Italiana Food</li> </ul>                                                                                                                                                               |
| Netherlands | <ul style="list-style-type: none"> <li>De Vereniging van Nederlandse Fabrikanten van Kinder- en Dieetvoedingsmiddelen (VNFKD)</li> </ul>                                                                                             |
| Poland      | <ul style="list-style-type: none"> <li>Polska Federacja Producentów Żywności (Polish Federation of Producers of Food)</li> <li>Farmacja Polska (Chamber of Commerce Polish Pharmacy)</li> </ul>                                      |
| Portugal    | <ul style="list-style-type: none"> <li>Associação Nacional da Indústria de Alimentação Infantil e Nutrição Especial (ANID)</li> </ul>                                                                                                |
| Romania     | <ul style="list-style-type: none"> <li>Asociația Română a Industriei Produselor Alimentare cu Destinație Nutritivă Specială (ARIPAD)</li> </ul>                                                                                      |
| Slovakia    | <ul style="list-style-type: none"> <li>Slovak Association of Branded Products (SZZV)</li> </ul>                                                                                                                                      |
| Spain       | <ul style="list-style-type: none"> <li>Asociación Nacional de fabricantes de productos de Dietética infantil (ANDI)</li> <li>Asociación Española de Fabricantes y Distribuidores de Productos de Nutrición Enteral (AENE)</li> </ul> |
| Switzerland | <ul style="list-style-type: none"> <li>Swiss Infant Nutrition Association</li> </ul>                                                                                                                                                 |
| UK          | <ul style="list-style-type: none"> <li>British Specialist Nutrition Association (BSNA)</li> </ul>                                                                                                                                    |

**Asia & Oceania**

|             |                                                                                                                                                               |
|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Australia   | <ul style="list-style-type: none"> <li>• Infant Nutrition Council</li> </ul>                                                                                  |
| Cambodia    | <ul style="list-style-type: none"> <li>• EuroCham Cambodia</li> <li>• Cambodia Chamber of Commerce</li> </ul>                                                 |
| China       | <ul style="list-style-type: none"> <li>• China Nutrition and Health Food Association</li> <li>• China Dairy Industry Association</li> </ul>                   |
| India       | <ul style="list-style-type: none"> <li>• Confederation of Indian Industry (CII)</li> <li>• Confederation of Indian Food Trade and Industry (CIFTI)</li> </ul> |
| Indonesia   | <ul style="list-style-type: none"> <li>• Association of Companies with Nutritional Products for Mothers and Children (APPNIA)</li> </ul>                      |
| Malaysia    | <ul style="list-style-type: none"> <li>• Infant Formula Ethical Committee (FIFEC)</li> </ul>                                                                  |
| New Zealand | <ul style="list-style-type: none"> <li>• Dairy Companies Association of New Zealand</li> </ul>                                                                |
| Singapore   | <ul style="list-style-type: none"> <li>• Singapore Infant Food Industry (SIFI)</li> </ul>                                                                     |
| Thailand    | <ul style="list-style-type: none"> <li>• Pediatric Nutrition Manufacturer Association (PNMA)</li> </ul>                                                       |

**Americas**

|           |                                                                                                                                                                                                                  |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Argentina | <ul style="list-style-type: none"> <li>• Asociación de empresas de Nutrición Infantil</li> </ul>                                                                                                                 |
| Brazil    | <ul style="list-style-type: none"> <li>• Associacao Brasileira das Indústrias de Alimentos (ABIA)</li> <li>• Associação Brasileira da Indústria de Alimentos para Fins Especiais e Congêneres (ABIAD)</li> </ul> |
| Mexico    | <ul style="list-style-type: none"> <li>• La Cámara Nacional de Industriales de la Leche (CANILEC)</li> </ul>                                                                                                     |

**Middle East & Africa**

|               |                                                                                                                                                                      |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Côte d'Ivoire | <ul style="list-style-type: none"> <li>• Association des fabricants et distributeurs des aliments infantiles (AFDAI-CI)*<br/><i>*creation in progress</i></li> </ul> |
| Kenya         | <ul style="list-style-type: none"> <li>• Kenya Association of Manufacturers</li> </ul>                                                                               |
| Middle East   | <ul style="list-style-type: none"> <li>• Multinational Companies Business Group</li> <li>• UAE Food &amp; Beverage Manufacturers</li> </ul>                          |
| Morocco       | <ul style="list-style-type: none"> <li>• Association Marocaine de la Nutrition Infantile (AMNI)</li> </ul>                                                           |

|              |                                                                                                                                                                  |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nigeria      | <ul style="list-style-type: none"> <li>Association of Infant Food Manufactures &amp; Marketers in Nigeria (AIFMMN)*<br/><i>*registration on-going</i></li> </ul> |
| South Africa | <ul style="list-style-type: none"> <li>Infant Feeding Association of South Africa</li> </ul>                                                                     |
| Turkey       | <ul style="list-style-type: none"> <li>Tüm Gıda İthalatçıları Derneği (TUGIDER)</li> </ul>                                                                       |

## APPENDIX 2: THE EU TRANSPARENCY REGISTER

The EU Transparency Register is a database that lists organizations that try to influence the law-making and policy implementation process of the EU institutions. The register makes visible what interests are being pursued, by whom and with what budgets. In this way, the register allows for public scrutiny, giving citizens and other interest groups the possibility to track the activities of lobbyists.

### SEARCH THE REGISTER:

<https://ec.europa.eu/transparencyregister/public/consultation/search.do?locale=en&reset=>

### SEE DANONE REGISTRATION:

<https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=65744846168-89>

### MEETINGS WITH INTEREST REPRESENTATIVES:

As part of the Commission's commitment to transparency, Commissioners, their cabinet members and Directors-General publish information on meetings held with organizations or self-employed individuals.

Meetings relating to policy-making and implementation in the EU can only take place if the interest representatives are registered in the EU transparency register.

For details, please see the Commission decisions of November 2014:

[https://ec.europa.eu/info/about-european-union/principles-and-values/transparency/transparency-register\\_en](https://ec.europa.eu/info/about-european-union/principles-and-values/transparency/transparency-register_en)

## APPENDIX 3: THE UNITED STATES' LOBBYING DISCLOSURE ACT

### PUBLIC REGISTRATION AND DATABASE:

<https://lobbyingdisclosure.house.gov/lookup.asp>

### DEFINITIONS:

- Lobbyist – The LDA specifies that a “lobbyist” is anyone who is employed for services that include, over a three-month period. Anyone who:
  - (1) More than one lobbying contact for a client (or, an in-house employee, for the employer) and
  - (2) for whom lobbying activities account for at least 20 percent of the time he or she spends providing services to the employer/client.
- Lobbying Activities – lobbying contacts and efforts in support of such contacts, including preparation and planning activities, research and other background work if it is intended, at the time it is performed, for use in lobbying contacts (including by others).
- Lobbying Contact – a communication (oral, written or electronic) with a covered legislative or executive branch official with regard to:
  - (1) the formulation of Federal legislation, rules, regulations, an Executive Order or policy;
  - (2) the administration of a Federal program or policy, including the negotiation or award of a Federal contract, grant, loan, permit, program or license; or
  - (3) the nomination of anyone subject to Senate confirmation.
- Covered Legislative Branch Official – essentially anyone working in Congress, including all Members of Congress, and any staff person working for a Member of Congress or a Congressional Committee.
- Covered Executive Branch Official – includes:
  - (1) any employees in the Executive Office of the President, including the President and Vice-President;
  - (2) any “schedule C” political appointee;
  - (3) any member of the uniformed services serving at pay grade O-7 or above (Brigadier General or Rear Admiral and above), and
  - (4) other high-level officials (those paid at levels I-IV of the Executive Schedule). In general, officials of this rank include cabinet-level officials (agency Secretaries), Deputy Secretaries, and in some cases lower-level political appointees, such as Under or Assistant Secretaries.

**AS PART OF DANONE'S POLITICAL CONTRIBUTIONS POLICY:**

No funds or other assets of Danone may be used to make a contribution to:

- any federal, state, or local political party or candidate for elected office;
- any 527 group, political action committee, or an independent-expenditure-only committee;
- any 501(c)(4) organization to be used for political contributions or independent expenditures; or
- any trade association or 501(c)(6) organization to be used for political contributions or independent expenditures.

Danone's policy prohibits corporate political contributions of all forms including in-kind contributions. No funds or other assets of Danone may be used to make any independent expenditure in support of, or in opposition to, any political party or candidate.

While Danone employees may participate as individual citizens in the political process, decisions to do so are entirely personal and voluntary. Employees engaging in political campaign activities are expected to do so as private citizens, and must at all times make clear that their views and actions are their own, and not those of Danone.