



FrieslandCampina 

nourishing by nature

Policy on Responsible Advocacy



Compass

Introduction

FrieslandCampina has a long history and exists in a cooperative tradition. As a cooperative we are future focused. We do that for our consumers, our customers, our farmers. And for the world. Everything we do at FrieslandCampina is guided by our purpose: nourishing by nature. With our purpose we strive for: better nutrition for the world, a good living for our farmers, now and for generations to come.

In line with this purpose, FrieslandCampina engages with public authorities in view of working towards positive outcomes for both business and society. As FrieslandCampina we believe that advocacy is a legitimate part of the political process. When done responsibly, advocacy leads to better legislation, rules and standards, increases stakeholder engagement in public life and serves the public interest. FrieslandCampina works across industries, civil society organisations and public authorities to support transparency, engagement and continuous improvement.

Definition and scope

There are no universally agreed definitions of advocacy or lobbying. In the view of FrieslandCampina there is no principal difference between lobbying and advocacy; both refer to the same activities. FrieslandCampina has chosen to use the term 'advocacy' and applies the definition of Transparency International, which is also used in the [Responsible Lobbying Framework](#). The definition in that framework reads: "any direct or indirect communication with public officials, political decision-makers or representatives for the purposes of influencing public decision making and carried out by or on behalf of an organised group. Lobbying can also include direct or indirect attempts to influence public opinion, outside of normal advertising and marketing activity, with a view to impacting public decision making".

In this document, the view of FrieslandCampina on responsible advocacy is given and it contains the principles we commit and adhere to. In addition guidance for employees is given. The FrieslandCampina Policy on Responsible Advocacy is inspired by the Responsible Lobbying Framework, the OECD Principles for Transparency and Integrity in Lobbying and the Transparency International Standards for Lobbying Regulation. The policy is globally applicable to all our employees and all third parties acting on behalf of FrieslandCampina.

General principles

As FrieslandCampina we believe in respectful, honest business relations and in showing respect for the world in which we operate. This means that we not only follow the letter of the law but also the spirit of the law and FrieslandCampina policies applicable to our activities. Any interaction in the context of advocacy must comply with local laws and regulations and relevant FrieslandCampina policies and standards. This includes, but is not limited to

→ [Compass for good business conduct](#) which is based on our values integrity, respect and transparency and covers topics such as anti-bribery, gifts & payments and political contributions (as laid down in the Doing honest business policy) and conflicts of interest (which is subject of the Policy on avoiding conflicts of interest).

→ [the FrieslandCampina Corporate Policy for the Marketing of Infant Foods](#),

→ [the FrieslandCampina Nutrition Policy](#)

The following is applicable in addition and underpins open, transparent and responsible interaction.

When engaging in advocacy on behalf of or in the interest of FrieslandCampina, integrity, honesty, transparency and behavior in a fair and professional manner is a prerequisite. Any employee or third party that acts on behalf of FrieslandCampina is required to disclose their identity and relationship with FrieslandCampina before establishing the interaction; whether it is formal or informal. In case of situations not specifically covered by applicable laws or internal rules it is expected that these situations are handled in the spirit of them. In case of doubts the manager should be asked for direction and advice.

Our advocacy should support an evidence-based and consistent approach towards policy-making and should always be fact-based, taking into consideration independent, peer-reviewed science. We respect public policy frameworks developed by international agencies, regional, national and/or sub-national governments, and standard-setting bodies.

It is the right of people to change positions between government and business settings. This might create even an advantage for policy making with respect to mutual understanding. FrieslandCampina acknowledges the inherent risks related to potential conflicts of interest which may arise from the “revolving door”. We emphasize the personal responsibility of people in relation to the “revolving door” and conflict of interest should always be avoided. In the event of FrieslandCampina employing an individual from the public sector, the individual situation must be carefully assessed. If necessary, measures are taken to avoid potential conflict of interest. It can be considered to adapt or restrict the job of the employee coming from the public sector for a certain

period of time (e.g. a cooling off period). In addition, compliance with any existing contractual confidentiality and restrictive agreements should be taken into account.

Engagement with stakeholders

In advocacy on behalf of FrieslandCampina, besides the company's objectives, the wider public interest should always be considered. In the view of FrieslandCampina it is of importance that the positions of all stakeholders are considered in the public decision-making process. Therefore, FrieslandCampina respects and safeguards the opportunity for other interest groups to lobby.

As FrieslandCampina we are always looking for opportunities for multi-stakeholder partnerships with for instance other companies and civil society organisations, to act together where a common position that supports key public interest outcomes can be found. The annual report of FrieslandCampina provides an overview of our stakeholders globally including topics of discussion and outcomes of these dialogues.

FrieslandCampina is a member of several trade associations and industry policy groups. An overview of these memberships is published on our Corporate website. We expect from these associations that they operate to the same responsible advocacy standards as FrieslandCampina. As a member of these trade associations and industry policy groups we strive for a common position. If FrieslandCampina does not agree with the position that is taken by the trade association or industry policy group, we communicate always our position clearly and transparently to all stakeholders involved. FrieslandCampina reserves its right to act as an individual company and engage in advocacy independently in this context.

Accountability

The FrieslandCampina Policy on Responsible Advocacy is approved and endorsed by the Executive Board of FrieslandCampina. This Policy is owned by the Corporate Director Public Affairs & Farm Sustainability and is published on www.frieslandcampina.com. The responsibility for global implementation lies with the Managing Directors of the FrieslandCampina entities. Employees are informed about this Policy and training about the Policy and its content is given to employees for whom this is relevant.

The FrieslandCampina Policy on Responsible Advocacy reflects how we want to interact: with integrity, respect and transparency. Not acting in accordance with this Policy may lead to disciplinary measures, including dismissal. If there

are doubts about activities not being in line with the FrieslandCampina Policy on Responsible Advocacy, concerns can be raised via the [Speak Up procedure](#). Complaints regarding the compliance with the Policy are monitored and reported.

Responsible advocacy in practice: guidance for employees

FrieslandCampina expects the following from its employees and third parties acting on behalf of FrieslandCampina:

- Any activity in the context of advocacy must fully comply with all applicable national and international laws and in particular with laws related to transparency, competition and anti-trust behavior
- Any activity in the context of advocacy must be in line with this Policy and FrieslandCampina Compass for good business conduct, particularly the Policy on avoiding conflicts of interest and the Doing honest business policy
- Act ethically and with integrity, honesty and transparency at all times. Use your professional judgment, case by case
- In engagement with public officials you must clearly identify yourself and describe your role in our company or the trade association that you represent.
- Ensure that the information you present is correct, accurate and fact-based. When you share information that is an opinion rather than fact-based, be transparent about it.
- You are personally responsible to make sure you understand what is meant in this Policy. Ask your manager in case of doubt
- As a manager you must promote the compliance to this Policy and lead by example. You must create an environment where there is openness and trust to discuss concerns and where employees feel free to speak up
- In case you are in doubt, speak up, be transparent and discuss any concerns you may have with your colleagues or with your manager. You may also use the [Speak up procedure](#) to voice your concerns

Version:	1.0
Date:	1 June 2022
Author:	Corporate Public Affairs & Farm Sustainability
Approving body:	Executive Board of FrieslandCampina
Target audience:	All FrieslandCampina employees and all third parties acting on behalf of FrieslandCampina involved in advocacy. Interested members of the public
Copyright:	All rights reserved. No part of this publication may be reproduced, and/or published in any form or in any way, electronically, mechanically, by print, photoprint, microfilm, internet or any other means without prior written permission from the publisher.
Repository:	www.frieslandcampina.com



Royal FrieslandCampina N.V.

Stationsplein 4, 3818 LE Amersfoort
The Netherlands
T +31 33 713 3333

www.frieslandcampina.com