



OVERVIEW

The Food and Agriculture Corporate Transparency (FACT) Index tracks the political disclosure of the world's largest food and agricultural corporations. The corporations featured in the Index were selected based on reported 2020 revenue, and include both privately-owned and publicly-traded corporations. The types of spending disclosure we assessed were electioneering, lobbying, charitable, and scientific because this spending is a primary means of influencing public policy.

The FACT Index is an original piece of research, but it is inspired by the pioneering work of other researchers and institutions. In particular, the CPA-Zicklin Index, created by the Center for Political Accountability (CPA), analyzes the political activities of Fortune 500 corporations within the United States. The conceptual basis of our research was inspired by CPA's work, though the FACT Index focuses specifically on food and agriculture corporations and examines a broader range of political giving (electioneering, lobbying, science, and charity) as prevalent means by which corporations influence policy. Secondly, we also wish to acknowledge the work of the Access to Nutrition Initiative (ATNI) for its work on the [Global Access to Nutrition Index](#), which has inspired some aspects of this work, including the organization of subcategories and the presentation of the results.

To index the political giving of corporations, we generated questions for the categories of giving aforementioned. Corporations received points for partial or full disclosure on each question, with a range of points awarded, depending on the extent to which they disclosed their activity, for a total of 100 possible points. The presence of a publicly-available policy prohibiting giving under one of the four categories, such as an express prohibition on making donations to political candidates, resulted in a corporation receiving full points for disclosure in that realm. The reasoning here: such a policy not only affords a safeguard against the corporation's harmful interference in policy, but makes disclosure moot.

This [survey](#), communicated to corporations in advance of the FACT Index release, contains the questions asked for each category and the total number of possible points that correspond to each question. Each of the numbers in the legend corresponds to the numbers in the scoring table for each of the questions. The total score for each section reflects the degree to which a corporation discloses information about its spending in that category (electioneering, lobbying, charity, and science). A high score reflects a significant amount of disclosure and a low score reflects a low level of disclosure.

The four categories, again, are as follows:

- Electioneering, including activities to influence electoral outcomes, such as the election of public officials and ballot measures, e.g. a donation to a political candidate's campaign.
- Lobbying, including any activity to directly or indirectly influence the decision or action of government officials, legislators, or regulatory agencies, such as hiring a lobbyist to engage policymakers about a proposed regulation.
- Charity, specifically any donation to a charitable organization, directly from the corporation or the connected corporate foundation, if applicable.
- Science, including any activities that may influence scientific studies, academic or research institutions, or professional associations, particularly those relevant to a corporation's products.

To compile this list, we compiled a list of the largest food and agriculture corporations in the world based on annual reports for publicly-traded corporations and self-reports for private corporations. For purposes of this inaugural index, we focused specifically on corporations whose primary business is food production or processing—whether grains and seeds or processed food products like soda and snacks. We saw production versus retail and service as a natural starting point for inquiry. We anticipate expanding our analysis to include the largest actors in other segments of the industry in the future.

REVIEWING DISCLOSURE

To identify corporate disclosure, we reviewed the corporate websites and conducted internet searches for the following:

- Policies, including, political engagement policies, lobbying policies, trade and policy organization policies, charitable spending policies, and scientific funding policies;
- And disclosure documents, including files or web pages which fully or partially disclose a corporation's political, lobbying, charitable, and scientific activities.
- These were also cross-checked with publicly available reports, such as Senate lobbying filings, SEC filings, Opensecrets.org profiles, and European Transparency Register filings. While these did not alter scores, they did confirm corporations' engagement in political activities and self-reporting statements.

RESEARCH METHODS

Our research used the following search methods:

- Exploring corporate and corporate investor websites (the U.S. and other country websites) to directly discover corporate disclosures, including utilizing corporate sitemaps.
- Reviewing annual reports and annual sustainability reports for any mention of political, scientific, or charitable activities.
- Using related search terms to identify disclosure activities for the corporation using Google and other search engines.
 - For example, for Coca-Cola, we used search terms such as:
 - political ".spending", ".contributions", ".donations", ".disclosure", "policy"
 - charitable ".spending", ".contributions", ".donations", ".disclosure", "policy"
 - lobbying ".spending", ".activities", ".disclosure",
 - scientific and science ".spending", ".contributions", ".donations", ".disclosure", ".studies"
 - trade association ".contributions", ".membership", ".disclosure"
- Google site (e.g. "site:coca-colacompany.com political activity") and corporate site searches for the above terms.

Only information that was publicly disclosed by the corporation on its website was counted as disclosure (e.g. Coca-Cola's [political disclosures](#)), rather than information disclosures on external websites, such as GRI reports, news articles, or government databases, the last of which is especially difficult for people to find and analyze, so is not an accurate reflection of transparency. However, external disclosures, when discovered, were utilized to support research conclusions.

Aggregate score out of 100.
[↓](#) DOWNLOAD DATASET

ALL RANKINGS BY:










TOTAL

ELECTIONEERING

LOBBYING

CHARITY

SCIENCE

01	 The Coca-Cola Company	39	19	9	8	3
02	 PepsiCo, Inc.	26	16	4	6	0
03	MARS Mars	24	20	2	2	0
04	 Unilever	20	18	2	0	0
05	 ADM	20	12	8	0	0
06	 Nestlé	18	3	5	2	8
07	 JBS	8	2	2	4	0
08	 Cargill	8	2	2	2	2
09	 Tyson Foods	3	0	0	2	1
10	 Bunge	2	0	0	2	0

Score out of 48 for disclosure of political campaign contributions.

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ALL RANKINGS BY:











TOTAL

ELECTIONEERING

LOBBYING

CHARITY

SCIENCE

01	 MARS	Mars	24	20	2	2	0
02	 The Coca-Cola Company	The Coca-Cola Company	39	19	9	8	3
03	 Unilever	Unilever	20	18	2	0	0
04	 PepsiCo, Inc.	PepsiCo, Inc.	26	16	4	6	0
05	 ADM	ADM	20	12	8	0	0
06	 Nestlé	Nestlé	18	3	5	2	8
07	 JBS	JBS	8	2	2	4	0
08	 Cargill	Cargill	8	2	2	2	2
09	 Tyson Foods	Tyson Foods	3	0	0	2	1
10	 Bunge	Bunge	2	0	0	2	0

Score out of 23 for disclosure of lobbying and trade group expenditures.

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ALL RANKINGS BY:










TOTAL

ELECTIONEERING

LOBBYING

CHARITY

SCIENCE

01	 The Coca-Cola Company	39	19	9	8	3
02	 ADM	20	12	8	0	0
03	 Nestlé	18	3	5	2	8
04	 PepsiCo, Inc.	26	16	4	6	0
05	 JBS	8	2	2	4	0
06	 Unilever	20	18	2	0	0
07	MARS	24	20	2	2	0
08	 Cargill	8	2	2	2	2
09	 Tyson Foods	3	0	0	2	1
10	 Bunge	2	0	0	2	0

Score out of 8 for disclosure of charitable giving that can help stove off, instruct public policy.

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DATASET

ALL RANKINGS BY:





TOTAL

ELECTIONEERING

LOBBYING

CHARITY

SCIENCE

01	 The Coca-Cola Company	39	19	9	8	3
02	 PepsiCo, Inc.	26	16	4	6	0
03	 JBS	8	2	2	4	0
04	 Nestlé	18	3	5	2	8
05	 Tyson Foods	3	0	0	2	1
06	MARS Mars	24	20	2	2	0
07	 Bunge	2	0	0	2	0
08	 Cargill	8	2	2	2	2
09	 Unilever	20	18	2	0	0
10	 ADM	20	12	8	0	0

Score out of 16 for disclosure of spending on research that can inform public policy.

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ALL RANKINGS BY:











TOTAL

ELECTIONEERING

LOBBYING

CHARITY

SCIENCE

01	 Nestlé	18	3	5	2	8
02	 The Coca-Cola Company	39	19	9	8	3
03	 Cargill	8	2	2	2	2
04	 Tyson Foods	3	0	0	2	1
05	 PepsiCo, Inc.	26	16	4	6	0
06	 JBS	8	2	2	4	0
07	 Unilever	20	18	2	0	0
08	 Mars	24	20	2	2	0
09	 ADM	20	12	8	0	0
10	 Bunge	2	0	0	2	0

Bunge

2 / 100

METHODOLOGY

BUNGE



PRISTINE GOURMET

RANKING BREAKDOWN:

#10 OVERALL OUT OF 10

CEO: Gregory Heckman

Annual Revenue: \$41.4 billion

Top Subsidiaries: Nuestra, Pristine Gourmet, Whole Harvest, and 37 others.

Countries they operate in: 40 countries

Private or Public: Public

Industry Type: Agribusiness

Corporation Size: 24,000 employees



Board Information

Notable members include: **Sheila Bair**, who formerly served as Assistant Secretary for Financial Institutions at the U.S. Department of the Treasury, Senior Vice President for Government Relations of the New York Stock Exchange, Commissioner of the Commodity Futures Trading Commission, and as counsel to Kansas Republican Senate Majority Leader Bob Dole; **Carol M. Browner**, former EPA Administrator under the Clinton Administration, who served as Assistant to President Barack Obama and Director of the White House Office of Energy and Climate Change Policy, and who now chairs the board of the League of Conservation Voters; **Paul J. Fribourg**, Director of Estee Lauder Companies, Inc., Restaurant Brands International, Inc. and Loews Corporation, as well as Syngenta AG, and a member of the Rabobank International North American Agribusiness Advisory Board; **J. Erik Fyrwald**, CEO of Syngenta and Chairman of the Syngenta Foundation for Sustainable Agriculture, Board Member for CropLife International, former President and CEO of Univar, a leading distributor of chemicals and Group Vice President of the Agriculture and Nutrition Division of DuPont; and **Bernardo Hees**, who served as CEO of The Kraft Heinz Company, as CEO of H.J. Heinz Company, and as CEO of Burger King Worldwide Holdings, Inc.


How to Improve

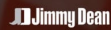
Other than providing some general information about charitable giving around the world, Bunge does not provide any details on its electioneering or lobbying efforts, in the U.S. or elsewhere. Its near total lack of transparency awarded it last place in this year's FACT Index ranking. Disclosing electioneering and lobbying activities is an essential place for Bunge to start addressing its failure.



Tyson Foods

3 / 100

 METHODOLOGY



CEO: Donnie King

Annual Revenue: \$43.19 billion

Top Subsidiaries: Hillshire Farm, Jimmy Dean, BallPark, State Fair, and 33 others.

Countries they operate in: 10 countries

Industry Type: Meat Packing

Private or Public: Public

Corporation Size: 139,000 employees

Board Information

Notable members include **Gaurdie E. Banister Jr.**, President and Chief Executive Officer of Aera Energy LLC, one of California's largest oil and gas producers, which is jointly owned by major energy corporations Royal Dutch Shell and ExxonMobil; **Mike Beebe**, who currently serves as a member of the Governors' Council for the Bipartisan Policy Center, an advisor to Arkansas State University, is a former Governor of Arkansas, served as the state's attorney general, and was a state senator; **Maria Claudia Borrás**, currently Executive Vice President of Oilfield Services at Baker Hughes, an international energy technology corporation; **Mikel A Durham**, who formerly worked at PepsiCo, served as a Managing Director of Guinness, as President of Burger King North America; and as President of Global Supply for Cadbury Schweppes; and, **Robert Thurber**, who served as Vice President of Purchasing for Sysco Corporation, the largest U.S. food service marketing and distribution corporation.

How to Improve

You'd think a score of 3 out of 100 would score last place, but no. Tyson revealed nothing of its political or lobbying expenditures in the United States or beyond. It also provided almost no details on its charitable or scientific activities. Simply reporting U.S. political expenditures (which are already available by law and easily drawn into a corporate website) would be a good place to start.

RANKING BREAKDOWN:

#9 OVERALL OUT OF 10

ELECTIONEERING

0 / 48

LOBBYING

0 / 28

CHARITY

2 / 8

SCIENCE

1 / 16





8 / 100

METHODOLOGY



Purina



Diamond V

RANKING BREAKDOWN:

#8 OVERALL OUT OF 10

CEO: David MacLennan

Annual Revenue: \$114.6 billion

Top Subsidiaries: Purina, Diamond V, Nutrena, and 57 others.

Countries they operate in: 70 countries

Industry Type: Agribusiness

Public or Private: Private

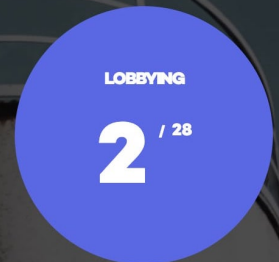
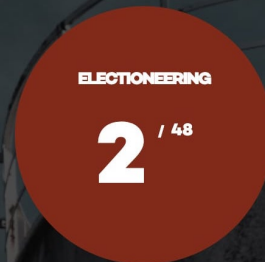
Corporation Size: 160,000 employees

Board Information

Notable members include: Sheela Riggs, Chair of the Department of Primary Dental Care at the University of Minnesota's School of Dentistry, on the boards of Hennepin Healthcare System, Inc., Benco Dental, Inc., Minnesota Hospital Association, and Wellmark Foundation; Anna Richo, Member of the Board of Trustees for DePaul University and of the Board of Directors of Adamas Pharmaceuticals and formerly served as a Member of the Board of Directors of Cytoc Corporation, a medical diagnostics company; and Muffy MacMillan, Chairman of Abbott Northwestern Hospital.

How to Improve

We wish we could say it doesn't get much worse than this, but as this ranking reveals, it does. Cargill does make some mention of charitable giving and trade associations (in press releases primarily), revealing some of its corporate behavior. But overall, it declares nothing regarding its political activities, other than that they "comply with the law and support Cargill's interests."



JBS

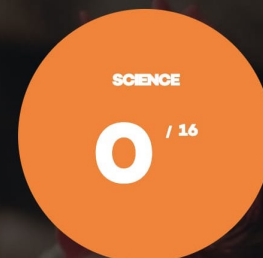
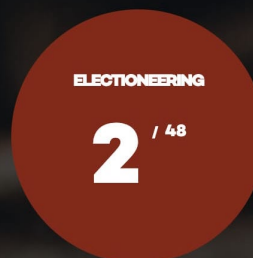
8 / 100

 METHODOLOGY



RANKING BREAKDOWN:

#7 OVERALL OUT OF 10



CEO: Gilberto Tomazoni

Annual Revenue: \$51.91 billion

Top Subsidiaries: Plumrose USA, Pilgrim's, Primo Smallgoods, and 67 others.

Countries they operate in: 190 countries

Industry Type: Meat Packing

Private or Public: Public

Corporation Size: 250,000 employees

Board Information

Board members include **Gilberto Meirelles Xandó Baptista**, CEO of Vigor Alimentos S.A. and Board Member of Itambé, a subsidiary of Lactalis; **Gelson Luiz Merisio**, who was a former State Deputy in the Legislative Assembly and former President of the Legislative Assembly of Santa Catarina; and **Aguinaldo Gomes Ramos Filho**, former Head of JBS Uruguay and JBS Paraguay and is the current CEO of agribusiness firm VL Participações.

How to Improve

JBS provides almost no information about its political or lobbying expenditures except membership in trade associations around the world (though without payment levels). It also provides some details on charitable giving, particularly in the United States. Providing data on political and lobbying activities would be an easy way for JBS to improve its score.





RANKING BREAKDOWN:

#6 OVERALL OUT OF 10



CEO: Mark Schneider

Annual Revenue: \$95.47 billion

Subsidiaries: Cat Chow, Cheerios, Coffee Mate, Gerber, Häagen-Dazs, Perrier, Smarties, and 73 others.

Countries they operate in: 105 countries

Industry Type: Food & Beverage

Private or Public: Public

Corporation Size: 273,000 employees

Board Information

Notable members of the Nestlé board include **Ann M. Veneman**, former United Nations Children's Fund (UNICEF) executive director, Secretary of the U.S. Department of Agriculture, and Secretary of the California Department of Food and Agriculture; **Pablo Isla**, formerly a part of the National Heritage Department of the Treasury Ministry for the Spanish Government; and **Lindiwe Majele Sibanda**, Director and Chairwoman, African Research Universities Alliance Centre of Excellence in Sustainable Food Systems (ARUA-SFS), University of Pretoria, South Africa, former Vice President, Country Support, Policy and Partnerships, Alliance for a Green Revolution in Africa (AGRA), member of the Independent Science Panel of the Climate Change Agriculture and Food Security Program (CCAFS).

How to Improve

Nestlé's disclosure of political activity is nearly non-existent. Its disclosure page declares, yes, the corporation engages governments, and that more can be found in government databases. Unfortunately, the corporation does not put as much effort into its political transparency as it does in its reporting of scientific funding and academic partnerships, which was well ahead of others rated.





Unilever



CEO: Alan Jope

Annual Revenue: \$62.27 billion

Top Subsidiaries: Lipton, Ben & Jerry's, Domestos, and 396 others.

Countries they operate in: 190 countries

Industry Type: Food & Beverage, and Consumer Products

Private or Public: Public

Corporation Size: 149,000 employees

RANKING BREAKDOWN:

#4 OVERALL OUT OF 10

ELECTIONEERING

18 / 48

LOBBYING

2 / 28

CHARITY

0 / 8

SCIENCE

0 / 16

Board Information

Notable members include: **Alan Jope**, former Vice Chair of the World Business Council for Sustainable Development Executive Committee and a member of the World Economic Forum's International Business Council. **Graeme Pitkethly**, Vice-Chair of the Financial Stability Board Task Force on Climate-related Financial Disclosures ("TCFD"). **Susan Kilsby**, formerly on the board of Coca Cola and Keurig Green Mountain. Strive Masiyiwa, serves on several international boards including Netflix Inc., National Geographic Society, Asia Society, and the Global Advisory boards of Bank of America, the Council on Foreign Relations (in the US), Stanford University, the Bloomberg New Economy Forum and the Prince of Wales Trust for Africa, and a former member of Rockefeller Foundation Board of Trustees).

How to Improve

Unilever lists the U.S. trade groups that lobby on its behalf on its FAQs page, but not the amounts it gives to each. It states that it does not make political contributions in the United States. Declaring this for other countries (if that is indeed the case) would improve Unilever's score significantly, as would sharing more detailed information on its lobbying activities, both within the U.S. and without. The corporation also fails to disclose any information on scientific or charitable giving.



ADM

20 / 100

METHODOLOGY



CEO: Juan R. Luciano

Annual Revenue: \$64.36 billion

Top Subsidiaries: Florida Chemical Company LLC, Pura Foods, Soy Investors LLC, Vantage Corn Processors LLC & and 133 others.

Countries they operate in: 53 countries

Industry Type: Agribusiness

Private or Public: Public

Corporation Size: 38,332 employees

Board Information

Notable members include: **Juan R Luciano**, who formerly worked at The Dow Chemical Company, served on the Global Advisory Board of the Kellogg School of Management at Northwestern University, and is a member of the United States-China Business Council; **Michael Burke**, former Co-Chair of the World Economic Forum Infrastructure and Urban Development community; **Terrell K. Crews**, former CFO of Monsanto; **Francisco J. Sanchez**, a member of the Council on Foreign Relations, and a member of the board of Teewinot Life Sciences (biotech/pharmaceuticals), and of the non-profit H. Lee Moffitt Cancer Research Center; and, **Debra A. Sandler**, former president and CEO of LaGrenade Group, LLC, a marketing consultancy that serves packaged goods corporations operating in the health and wellness space, and who previously held leadership roles at PepsiCo, Johnson & Johnson and Mars, and currently serves on the boards of Keurig Dr Pepper, Inc.

How to Improve

ADM did fairly well in organizing its political and lobbying expenditures in the United States since 2016. ADM, however, did not report any expenditures outside the US. In addition, the corporation provided very limited disclosure regarding its charitable or scientific funding.

RANKING BREAKDOWN:

#5 OVERALL OUT OF 10

ELECTIONEERING

12 / 48

LOBBYING

8 / 28

CHARITY

0 / 8

SCIENCE

0 / 16



Mars

24 / 100

 METHODOLOGY

MARS

Twix

m&m's

RANKING BREAKDOWN:

#3 OVERALL OUT OF 10

WRIGLEY

CEO: Grant F. Reid

Annual Revenue: \$37 billion

Top Subsidiaries: Twix, M&M's, Wrigley, and 47 others.

Countries they operate in: 80 countries

Industry Type: Food & Beverage

Private or Public: Private

Corporation Size: 130,000 employees

ELECTIONEERING

20 / 48

LOBBYING

2 / 28

CHARITY

2 / 8

SCIENCE

0 / 16

Board Information

As a private corporation, members of the board are primarily Mars family members. The most notable member of the Mars board is **Stephan Badger**, who used to work at Seeds of Change, an organic farming company now owned by Mars; **Pamela Mars-Wright**, who also serves on the supervisory board of Heineken; and Board Member **Victoria B. Mars**, served as brand manager of Milky Way, worked for Dove chocolate, and then as ombudsman for Mars, Inc.

How to Improve

Mars scored the best in electioneering, both due to its policy limiting political activity by the corporation and its clear disclosure of this decision. Unfortunately, it failed to take the easy step of providing reporting on lobbying activities, and also provides very little data on its funding of scientific or charitable giving practices.



PepsiCo, Inc.

26 / 100

 METHODOLOGY



Tropicana



CEO: Ramon Laguarta

Annual Revenue: \$70.37 billion

Top Subsidiaries: Quaker Oats, Doritos, Tropicana, Gatorade, Fritos and 18 others.

Countries they operate in: 26 countries

Industry Type: Food & Beverage

Private or Public: Public

Corporation Size: 291,000 employees

RANKING BREAKDOWN:

#2 OVERALL OUT OF 10

ELECTIONEERING

16 / 48

LOBBYING

4 / 28

CHARITY

6 / 8

SCIENCE

0 / 16

Board Information

Notable members include: **Ramon Laguarta**, who serves as the Co-Chair of the World Economic Forum's Board of Stewards for the Food Systems Initiative; **Cesar Conde**, who is the Chairman of the NBCUniversal News Group, which oversees NBC News, MSNBC and CNBC. He was also formerly on the board of Walmart Inc.; **Sir Dave Lewis**, who was the CEO of the supermarket chain, Tesco, held various management roles at Unilever, serves on the boards of several non-profit and charitable organizations, including as Chair of World Wildlife Fund, and was Chair of UN program Champions 12.3 which focused on the UN Sustainable Development goals; **David Page** who serves as the chair of the Visiting Committee for the Harvard Medical School and Harvard School of Dental Medicine, as well as being on the board of the Society for Women's Health Research; and **Alberto Weisser** who served as the Chairman and Chief Executive Officer of Bunge Limited and serves as a Supervisory Board Member of Bayer AG and a Board Member of the Americas Society.

How to Improve

PepsiCo did fairly well in reporting political and lobbying expenditures in the United States, but failed to report any of these activities in other countries. Its disclosure of charitable giving was also significant. However, the corporation failed to disclose any scientific funding or academic partnerships.



The Coca-Cola Company

39 / 100

METHODOLOGY

Coca-Cola

Sprite

Honest
tea

Minute
Maid

POWERADE

CEO: James Quincey

Annual Revenue: \$33.01 billion

Top Subsidiaries: Sprite, Honest Tea, Minute-Maid, Powerade, and 396 others.

Countries they operate in: 200+ countries and territories

Industry Type: Food & Beverage

Private or Public: Public

Corporation Size: 80,300 employees

Board Information

Notable members include: **Marc Bolland**, who served as Chief Executive Officer and a Director of WM Morrison Supermarkets PLC, a leading supermarket chain in the United Kingdom; **Helene D. Gayle**, who served as Program Director in the Global Health Program at the Bill & Melinda Gates Foundation and was the Director of the U.S. Center for Disease Control's National Center for HIV, STD and TB Prevention; **Alexis M. Herman**, who served as U.S. Secretary of Labor; and **Maria Elena Lagomasino**, who was the former Managing Director of The Chase Manhattan Bank, and is also a Director of The Walt Disney Company.

How to Improve

Coca-Cola scored better than any other corporation in the Index. It had the highest score in lobbying expenditures and charitable giving. However, the corporation failed to report its political and lobbying activities in the 200 other countries and territories it does business in (beyond the United States). While Coca-Cola has also vowed to "do better" as regards scientific research, one concrete step would be to disclose scientific funding and academic partnerships.

RANKING BREAKDOWN:

#1 OVERALL OUT OF 10

ELECTIONEERING

19 / 48

LOBBYING

9 / 28

CHARITY

8 / 8

SCIENCE

3 / 16



Criterion	Question Number	Subcategory	Question	Points	Scoring	
Lobbying	1	Direct Campaign Contributions	Does the corporation publicly disclose its direct contributions (i.e. from its corporate treasury rather than associated PACs) to political candidates, parties and committees in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	2		Does the corporation publicly disclose its contributions (i.e. from its corporate treasury rather than associated PACs) to political candidates, parties and committees or the equivalent in countries outside of the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	3	Indirect Campaign Contributions	Does the corporation publicly disclose the list of 501(c)(6) trade associations to which it has contributed money, which may have been wholly or partly used for electioneering activities, in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list or partial list with partial \$ amounts 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	4		Does the corporation publicly disclose the list of trade associations to which it has contributed money, which may engage in electioneering activities, and the amounts used for electioneering outside of the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	5		Does the corporation publicly disclose the list of 501(c)(4) social welfare organizations to which it has contributed money and the amounts used for electioneering in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	6		Does the corporation publicly disclose the nongovernmental organizations (i.e. 501(c)(4) equivalencies) to which it has contributed money and the amounts used for electioneering outside of the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	7		Does the corporation publicly disclose a list of political organizations (i.e. 527 entities (PAC)) it made donations to in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	8		Does the corporation publicly disclose a list of political organizations it made donations to outside of the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts OR \$ amounts with no recipient list 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	9		Ballot Measures	Does the corporation publicly disclose payments made to influence the outcome of ballot measures in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial list of ballot measures supported or opposed with no \$ amounts 2 = full list of ballot measures supported or opposed 3 = full list or partial list of ballot measures supported or opposed with \$ amounts 4 = full itemized list of ballot measures supported or opposed with amounts given to each OR explicit policy that prohibits this type of activity
	10			Does the corporation publicly disclose payments made to influence the outcome of ballot measures outside of the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity
	11	Independent Expenditures	Does the corporation publicly disclose independent political expenditures made in direct support of or opposition to a candidate or campaign in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	12		Does the corporation publicly disclose independent political expenditures made in direct support of or opposition to a candidate or campaign outside the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
Lobbying	13	Direct Lobbying Activities	Does the corporation publicly disclose the amount it has spent on lobbying activities and what it has lobbied for or against in the US?	6	0 = no disclosure Additional points: 1 point awarded for partial disclosure of lobbying \$ OR 2 points awarded for full disclosure of lobbying \$ 1 point awarded for partial disclosure of what it has lobbied on (e.g. issues or disclosure for only some issues) OR 2 points awarded for full disclosure for what it has lobbied on 1 point awarded for partial disclosure for what it has lobbied for (i.e. not just the issue, but also whether it lobbied for or against it OR 2 awarded points for full disclosure OR 6 points awarded for a policy that prohibits any lobbying activity	
	14		Does the corporation publicly disclose the amount it has spent on lobbying activities and what it has lobbied for or against outside the US?	6	0 = no disclosure Additional points: 1 point awarded for partial disclosure of lobbying \$ OR 2 points awarded for full disclosure of lobbying \$ 1 point awarded for partial disclosure of what it has lobbied on (e.g. issues or disclosure for only some issues) OR 2 points awarded for full disclosure for what it has lobbied on 1 point awarded for partial disclosure for what it has lobbied for (i.e. not just the issue, but also whether it lobbied for or against it OR 2 awarded points for full disclosure OR 6 points awarded for a policy that prohibits any lobbying activity	
	15	Indirect Lobbying Spending	Does the corporation publicly disclose the list of trade associations to which it has contributed money for the purposes of lobbying in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial list of trade associations with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	16		Does the corporation publicly disclose the list of trade associations to which it has contributed money for the purposes of lobbying outside the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	17		Does the corporation publicly disclose the list of 501(c)(4) social welfare organizations to which it has contributed money, which may engage in lobbying activities in the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
	18		Does the corporation publicly disclose the list of nongovernmental organizations to which it has contributed money and the amounts used for lobbying activities outside of the US, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity	
Charity	19	Does the corporation publicly disclose a list of organizations to which it has made charitable contributions in the US and the amounts given, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity		
	20	Does the corporation publicly disclose a list of organizations to which it has made charitable contributions outside the US and the amounts given, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity		
Science	21	Does the corporation publicly disclose its funding of scientific research, including the amount it has contributed, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity		
	22	Does the corporation publicly disclose its donations to academic or research institutions, including a recipient list and the amount contributed, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity		
	23	Does the corporation publicly disclose its partnerships with academic or research institutions, including the amount it has spent on the partnerships?	4	0 = no disclosure 1 = partial partnership list with no \$ amounts 2 = full partnership list 3 = full partnership list or partial partnership list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity		
	24	Does the corporation publicly disclose its funding of scientific, agricultural associations or professional associations with health professionals, including recipient names and amounts given?	4	0 = no disclosure 1 = partial recipient list with no \$ amounts 2 = full list 3 = full list or partial list with \$ amounts 4 = full itemized list with amounts given to each OR explicit policy that prohibits this type of activity		

