

**Company Name** General Mills  
**Industry** Agricultural Products (Supply Chain only)  
**UNGP Core Score (\*)** 14.0 out of 26

**Score Out of For indicators**

**Governance and Policy Commitments**

1	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy

**Embedding respect and Human Rights Due Diligence**

Embedding respect

2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
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Human Rights Due Diligence (HRDD)

1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed

**Remedies and Grievance Mechanisms**

1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned

**14.0 26**

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: As indicated in the human rights policy: 'We respect and acknowledge internationally recognized human rights principles. Within our Company and throughout our supply chain, we are committed to treating people with dignity and respect'. [Human rights policy on website, 05/2015: <a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs: The Company states in its human rights policy that 'to inform our approach to human rights, we look to: The United Nations Guiding Principles on Business and Human Rights'. However, this does not count as a formal commitment to these principles according to CHRB wording criteria. The same evidence is found the 2020 Responsibility report. No further evidence found. [Human rights policy on website, 05/2015: <a href="https://www.generalmills.com">generalmills.com</a> &amp; 2020 Global Responsibility Report, 2020: <a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: ILO Core: The Company's Human Rights Policy commits to each ILO core area: 'Consistent with the principles set forth in our Employee Code of Conduct and Supplier Code of Conduct, we: Prohibit forced labor, child labor, and discrimination. [...] Respect the principles of freedom of association and collective bargaining.' [Human rights policy on website, 05/2015: <a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>Met: Explicitly list All four ILO for AG suppliers: The supplier code of conduct contains an explicit commitment to each ILO core area. With respect freedom of association and collective bargaining, the Company indicates: 'You will recognize and respect the rights of employees to freedom of association and collective bargaining.' [Supplier code of conduct: <a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy commits to each ILO core area: 'Consistent with the principles set forth in our Employee Code of Conduct and Supplier Code of Conduct, we: Prohibit forced labor, child labor, and discrimination. [...] Respect the principles of freedom of association and collective bargaining.' [Human rights policy on website, 05/2015: <a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>Met: Respect H&amp;S of workers: The Company indicates that 'globally, (it) is committed to providing workplaces that are among the safest production facilities in the world for all our union and non-union production employees. In addition, we (...) offer competitive rewards; and implement clear health and safety practices'. The Company also states in its Humans rights policy that : 'we are committed with to establish safe and healthy working conditions.' [Global Responsibility 2019, 2019: <a href="https://www.generalmills.com">generalmills.com</a> &amp; Human rights policy on website, 05/2015: <a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>Met: H&amp;S applies to AG suppliers: The supplier code of conduct contains an explicit commitment to health and safety including different guidelines to follow. [Supplier code of conduct: <a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Commits to stakeholder engagement: The Company indicates the following in its human rights policy: 'We recognize that we are part of a broader community wherever we operate. In the communities where we operate, we believe that engaging stakeholders - including those from more at-risk populations - is fundamental to our respect for human rights. Where practical, we are committed to dialogue and engagement with all relevant parties in an effort to understand,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>assess and address areas of concern as appropriate'. [Human rights policy on website, 05/2015: <a href="https://www.generalmills.com">generalmills.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: In its engagement with CHRB, the Company indicates that 'At General Mills, we now have a resource appointed to enhance our human rights strategy in alignment with the UNGP Business and Human Rights framework. We have engaged a global, cross-functional team and are working with external stakeholders and organizations with expertise in human rights to identify our salient human rights issues and develop a roadmap'. However, no publicly available statement of policy committing it to engaging with affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach found. [2020 CHRB Supplemental Disclosure, 18/06/2020: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Regular stakeholder design engagement: The Company indicates, in its 2020 Global Responsibility Report, that 'When engaging with stakeholders, we assess potential alignment on objectives, organizational expertise, capacity, influence and willingness to collaborate'. Moreover, in the context to cocoa production, 'we have expanded our work with key suppliers and NGO partners to provide direct support to cocoa-growing communities in West Africa, where 90 percent of the cocoa we purchase is grown. (...) Collaboration is key to our progress, therefore we work directly with our suppliers to advance sustainability, address systemic challenges and enforce our Supplier Code of Conduct, which prohibits forced and child labor'. However, it is not clear how it engages with affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach, as evidence seems to focus in NGO collaboration and supplier monitoring to achieve sustainable sourcing of cocoa. [2020 Global Responsibility Report, 2020: <a href="https://www.generalmills.com">generalmills.com</a> &amp; Sustainable cocoa sourcing, N/A: <a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: The Company states in its human rights policy that 'as part of our commitment to respect human rights, we have established internal and external mechanisms to help identify, address and mitigate potential adverse human rights impacts that may be caused by our actions'. However, no formal commitment found to 'remedy'. Also, the 'Palm oil sourcing statement' (and the responsibility report) indicates that suppliers, in cases where there is verified non-compliance with our policy, or where there is continued failure to remediate verified non-compliances in a timely manner, we take steps to remove those producers from our supply chain'. Moreover, the company indicates, in its Slavery and Human Trafficking Statement, that 'our facilities, co-packers and suppliers are held accountable for the results of our responsible sourcing audits by our responsible sourcing managers, contract managers and our third-party audit partners. Our policy is to address all instances of noncompliance with company standards found during audits in a corrective action plan with supporting documentation of the actions taken. If a facility fails to make progress against a corrective action plan, they are subject to review and sanctions, including potential termination. We have terminated relationships with suppliers for issues such as unresponsiveness or repeated audit findings'. However, no evidence found of a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. No further information found in the Palm Oil Sourcing Statement 2019. [Human rights policy on website, 05/2015: <a href="https://www.generalmills.com">generalmills.com</a> &amp; Palm Oil Sourcing Statement 2019, N/A: <a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives: The Company is collaborating with the Cocoa &amp; Forest initiative to improve performance and working conditions in the Cocoa Supply chain in Ghana and Ivory Coast. However, this indicator looks for evidence of collaboration with initiatives that provide access to remedy when human rights violations have taken place. [Cocoa &amp; Forests Initiative action plan, N/A: <a href="https://www.generalmills.com">https://www.generalmills.com</a> 2020\2020 General Mills\2020_General Mills\2020 General Mills - 2 fase\General Mills_2 fase.docx#_Hlk44318345 1,536,656,0,,<a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>• Not met: Work with AG suppliers to remedy impacts: In the context of the Cocoa &amp; Forest Initiative, the Company indicates that it is 'working closely with our major suppliers to transition our global cocoa volumes to sustainable sourcing programs with a focus on improving smallholder farmer livelihoods sustainable production and ingredient quality'. Action plan is focused on 'forest protection and restoration;</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			sustainable production and farmers' livelihoods, and community engagement and social inclusion'. In relation to productions and livelihoods, via suppliers and delivery partners, the company states that 'we will continue to invest in the long-term productivity of cocoa/farms in our supply base through, among other things, the provision of Good Agricultural Practices training to farmers, the distribution of shade trees and the implementation of agroforestry practices'. The Company discloses reports on progress in both Ivory Coast and Ghana. However, this indicator looks for evidence of work carried out with suppliers to remedy a specific wrong-doing linked to the Company or its suppliers' operations. Current evidence seems to focus in improve performance in the context of poor working conditions generally, rather than tackling a specific incidences case'. [Cocoa & Forests Initiative action plan, N/A: <a href="https://generalmills.com">https://generalmills.com</a> 2020\2020 General Mills\2020_General Mills\2020 General Mills - 2 fase\General Mills_2 fase.docx#_Hlk44318345 1,536,656,0,, <a href="https://generalmills.com">generalmills.com</a> & CFI Progress Report 2020 - Cote d'Ivoire, 01/2020: <a href="https://generalmills.com">https://generalmills.com</a> report narrative FINAL 32520 002.pdf?la=en#CHRB 2020\2020 General Mills\2020_General Mills\2020 General Mills - 2 fase\General Mills_2 fase.docx#_Hlk44318621 1,1264,1369,0,, <a href="https://generalmills.com">generalmills.com</a> ]

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to each ILO core.</li> <li>• Met: Senior responsibility for HR: The Human rights policy states that 'the Public Responsibility Committee of the Board of Directors oversees our work in this area. Operational accountability rests with the head of Global Supply Chain, supported by members of the Global Executive Team including the Chief Executive Officer as well as the heads of Global Legal, External Relations and Human Resources'. [Human rights policy on website, 05/2015: <a href="https://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: In relation to 'labor practices' governance, the Responsibility report states that 'at an operational level, the Human Resources organization leads key employee initiatives in partnership with company business leaders at multiple levels. Reflecting the importance of people to our business, General Mills employs a Director of Diversity and Inclusion; a Director of Global Health Services; and a Vice President of Engineering, Global Safety and Environment'. [Global Responsibility 2019, 2019: <a href="https://generalmills.com">generalmills.com</a>]</li> <li>• Met: Day-to-day responsibility for AG in supply chain: 'Our supply chain and sourcing executive teams have accountability for our responsible sourcing programs. These teams meet at least twice a year to review progress.(...) To ensure alignment across the function, all sourcing employees complete online learning on our supplier code of conduct'. [Global Responsibility 2019, 2019: <a href="https://generalmills.com">generalmills.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company states that 'in 2018, we partnered with Hudson Consulting to conduct an assessment to update our list of material global responsibility issues, last done in 2015. (...) Based on the input, we created and distributed a materiality assessment survey to stakeholders to determine the relative importance of each issue. We received 30 responses from external stakeholders, most having a global focus and representing a wide variety of perspectives, including from academics, consultants, customers, investors, nongovernmental organizations and suppliers'. Among the issues that are most material to the company global responsibility strategy there is 'Protect and respect human rights throughout the value chain. Sub-issues: child labor; discrimination; fair compensation; forced labor; freedom of association and collective bargaining; gender equality; human trafficking; land rights; safe and healthy working conditions; working hours'. [Global Responsibility 2019, 2019: <a href="https://generalmills.com">generalmills.com</a>]</li> <li>• Met: Identifying risks in AG suppliers: Another issues that is among the most material to the company global responsibility strategy is: 'improve social, environmental and economic impacts of raw material sourcing. Sub-issues (...); risk assessments and audits; (...); supplier diversity; supplier responsibility; traceability'. [Global Responsibility 2019, 2019: <a href="https://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: In consultation with stakeholders: As indicated above, the Company consulted with suppliers. [Global Responsibility 2019, 2019: <a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>• Met: In consultation with HR experts: The Company indicates that 'In March 2020, General Mills initiated work with Shift the leading center of expertise on the UN Guiding Principles on Business and Human Rights, which provides the methodology for how companies can identify and act upon their human rights risks. Shift is supporting us in compiling recommendations for a forward strategy and roadmap on human rights'. [2020 CHRB Supplemental Disclosure, 18/06/2020: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company indicates in the 2019 Global responsibility report that 'we worked with Bureau Veritas to expand and elevate our responsible sourcing program in our first-tier supplier base'. In its public disclosure to CHRB, the Company adds that 'Risk factors considered by Bureau Veritas included geography, category, results of prior audits on numerous factors, including human rights and child labor. The data sources used by Bureau Veritas include 3,655 SMETA audits describing 35,409 issues, 12,763 ISO14001 audits describing 30,564 non-conformities, 1,324 SA800 audits describing 3,516 non-conformities. Overall, 17,622 audits distributed globally with a heavy concentration in countries with known ESG risks based on public sources including the Yale Performance Index, the Social Progress Global Index, the Worldwide Governance Index and the Corruption Perception Index. Based on an aggregation of all these data accounting for density, our segmentation was determined. These data sources were chosen to uncover risks as outlined in our Supplier Code of Conduct and focus heavily on Human Rights and Health and Safety'. [2020 CHRB Supplemental Disclosure, 18/06/2020: <a href="https://www.business-humanrights.org">business-humanrights.org</a> &amp; Global Responsibility 2019, 2019: <a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company describes in the responsibility report key challenges related to 10 priority ingredients including human rights risks identified for ingredients: Palm oil: Indigenous rights – irresponsible practices can threaten the rights of indigenous peoples; Sugarcane: Labor rights – including child and forced labor, and working conditions related to worker health, safety, and hours; Cocoa: Economic viability – the ability of smallholder farmers to earn enough from the crop to support their families and Child labor; Vanilla: Economic viability – the ability of smallholder farmers to earn enough from the crop to support their families. [2020 Global Responsibility Report, 2020: <a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company indicates, in its 2018 Global Responsibility Report, that 'beginning in fiscal 2018, we will require facilities identified to have inherent risk to complete a self-assessment and provide supporting documentation on policies, procedures and previous audits (when available), to provide further visibility regarding potential risk exposure'. Depending on the results these facilities will undergo audits/monitoring process based on Sedex. Moreover, regarding co-packers, the Company states, in 2020 Global Responsibility Report, that 'We require corrective action plans and resolution for any identified noncompliance'. However, current evidence focuses on compliance rather in developing wider action plans to prevent or mitigate/remediate salient issues. Also, on its webpage Sustainable Cocoa Sourcing, it states that 'Collaboration is key to our progress, therefore we work directly with our suppliers to advance sustainability, address systemic challenges and enforce our Supplier Code of Conduct, which prohibits forced and child labor. In addition, we are a member of the World Cocoa Foundation (WCF), which works with the food industry to address social and environmental issues in the cocoa supply chain'. However, no evidence found a system to generally mitigate salient human rights issues. [Global Responsibility report, 2018: <a href="https://www.generalmills.com">generalmills.com</a> &amp; Sustainable cocoa sourcing, N/A: <a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Including in AG supply chain: Regarding its 1 Tier suppliers, the 2019 report indicates that 'we require facilities identified as having inherent risk to complete a self-assessment and provide supporting documentation on policies, procedures and previous audits, when available. Depending on the results, some facilities are required to undergo an onsite third-party audit, based on the SMETA protocol, covering human rights, health and safety, the environment and business integrity'. Moreover, in its 2020 Global Responsibility Report, the Company states that 'to mitigate risk, we are enhancing our sourcing process to mandate compliance and decrease supplier time requirements'. However, current evidence focuses on specific supplier compliance rather in developing wider action plans to prevent or mitigate/remediate salient issues in supply chain. [Global Responsibility 2019, 2019: <a href="https://www.generalmills.com">generalmills.com</a> &amp; 2020 Global Responsibility Report, 2020: <a href="https://www.generalmills.com">generalmills.com</a>]</li> <li>• Met: Example of Actions decided: The Company reports carried out to improve supplier livelihood (including income) and agricultural practices, through action plans in Ghana and Ivory Coast as part of the Cocoa &amp; Forest Initiative. It indicates that it is 'working closely with our major suppliers to transition our global cocoa volumes to sustainable sourcing programs with a focus on improving smallholder farmer livelihoods sustainable production and ingredient quality'. Action plan is focused on 'forest protection and restoration; sustainable production and farmers' livelihoods, and community engagement and social inclusion'. In relation to productions and livelihoods, via suppliers and delivery partners, the company states that 'we will continue to invest in the long-term productivity of cocoa/farms in our supply base through, among other things, the provision of Good Agricultural Practices training to farmers, the distribution of shade trees and the implementation of agroforestry practices'. The Company discloses reports on progress in both Ivory Coast and Ghana. Issues affect farmers income, community involvement and women empowerment. [CFI Progress Report 2020-Ghana, 01/2020: <a href="https://www.generalmills.com">https://www.generalmills.com</a> report narrative FINAL 32520 002.pdf?la=en#CHRB 2020\2020 General Mills\2020_General Mills\2020 General Mills - 2 fase\General Mills_2 fase.docx#_Hlk44318697 1,1393,1500,0,,<a href="https://www.generalmills.com">generalmills.com</a> &amp; Cocoa &amp; Forests Initiative action plan, N/A: <a href="https://www.generalmills.com">https://www.generalmills.com</a> 2020\2020 General Mills\2020_General Mills\2020 General Mills - 2 fase\General Mills_2 fase.docx#_Hlk44318345 1,536,656,0,,<a href="https://www.generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective: The Company indicates that 'Global Sourcing has engaged with Bureau Veritas, our global program manager, to assess, address, monitor and close all pillars in our Supplier Code of Conduct including human rights via the Safe Supply portal. Annual plans are completed to ensure effectiveness of the actions we require of suppliers as well as incorporate lessons learned'. However, this evidence seems to focus in individual supplier action plans (compliance monitoring) rather in monitoring whether overall risks related to salient human rights issues are being prevented, mitigated or remediated. [2019 Engagement, 21/06/19: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process.</li> <li>• Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4</li> <li>• Not met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>



## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Code of conduct, which applies to all, refers to a channel to report concerns, the ethics point, which is available online. The Ethics Line is hosted by an independent reporting service. It's available 24 hours a day, 7 days a week, from any location worldwide and is multi-lingual. [Code of Conduct, 2018: <a href="https://generalmills.com">https://generalmills.com</a> &amp; Ethicspoint, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages: As indicated in the code, the ethics line is multi-lingual. On its website, it provides 12 different languages to use the channel. [Code of Conduct, 2018: <a href="https://generalmills.com">https://generalmills.com</a> &amp; Ethicspoint, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Met: Opens own system to AG supplier workers: The supplier code of conduct provides guidelines to report concern, including to contact the General Mills ethics line on the website and/or phone number for suppliers located in US, Canada and Puerto Rico. [Supplier code of conduct: <a href="https://generalmills.com">generalmills.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company indicates that the 'ethics line is available any day, any time of day, in multiple languages. Anyone can use it to share a concern or ask a question – employees, customers, suppliers, etc.'. The ethics line is referred in the human rights policy as a proper channel to report on human rights issues. This disclosure is from 2016 and no equivalent information has been found for the last three reporting years. To alleviate the reporting burden for companies during the Covid-19 crisis, the CHRB will (on an exceptional basis) relax the three-year timeframe and include information from 2016 in the 2020 assessment. [Code of Conduct, 2018: <a href="https://generalmills.com">https://generalmills.com</a> &amp; Submission to CHRB disclosure platform, 12/2016: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: See above, although the Company clarified that anyone can use the ethics line, this was indicated in a source that has more than three years. No more recent evidence found in publicly available sources. The Ethics Point is available in 13 languages (including Chinese, Korean, Thai, among others). This disclosure is from 2016 and no equivalent information has been found for the last three reporting years. To alleviate the reporting burden for companies during the Covid-19 crisis, the CHRB will (on an exceptional basis) relax the three-year timeframe and include information from 2016 in the 2020 assessment. [Ethicspoint, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a> &amp; Submission to CHRB disclosure platform, 12/2016: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Not met: AG supplier communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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