

**Company Name** Kellogg's  
**Industry** Agricultural Products (Supply Chain only)  
**UNGP Core Score (\*)** 16.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
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)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
1	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
<b>Remedies and Grievance Mechanisms</b>		
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
<b>16.5</b>	<b>26</b>	

(\*) 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	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: UNGC principles 1 &amp; 2: The Company is a signatory to the UNGC.</li> <li>• Met: UDHR: In its Human Rights Report 2018, the Company states: 'Kellogg is committed to, aligned with, and supports, all internationally recognized human rights as codified in the: United Nations Guiding Principles; Universal Declaration of Human Rights; International Bill of Human Rights; ILO core labour standards, as laid out in the following 8 conventions: Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 &amp; No. 98), The elimination of all forms of forced and compulsory labour (Convention No. 29 &amp; No. 105), The effective abolition of child labour (Convention No. 138 &amp; No. 182), The elimination of discrimination in respect of employment and occupation (Convention No. 100 &amp; No. 111); UN Global Compact's Ten Principles; OECD Guidelines for Multinational Enterprises'. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: International Bill of Rights: See above [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: The Company 'is committed to, aligned with, and supports [...] the United Nations Guiding Principles'. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: OECD: The Company 'is committed to, aligned with, and supports [...] the OECD Guidelines for Multinational Enterprises. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	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: ILO Core: According to its website section Human Rights Overview, Kellogg supports the ILO core labour standards, as laid out in the 8 conventions, indicating which are these. [Global Code of Ethics, 09/2019: <a href="http://kelloggcompany.com">kelloggcompany.com</a> &amp; Human Rights Overview, N/A: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: UNGC principles 3-6: The Company is a member of the UN Global Compact, and supports the ten principles. [Human Rights Overview, N/A: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: Explicitly list All four ILO for AG suppliers: The Global supplier code of conduct includes commitments to child labour, forced labour and discrimination. In relation to freedom of association and collective bargaining, it states the following: 'Suppliers must respect the rights of their Employees to freely associate, organize, and bargain collectively, where allowed by law'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'where allowed by law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. The Company provided comments to CHRB regarding this indicator. However, evidence was not material. [Global Supplier Code of Conduct, 06/2018: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: On its website section Human Rights Overview, the Company states: 'Our commitment aligns to, and supports, all internationally recognized human rights as codified in the: [...] ILO core labour standards, as laid out in the following 8 conventions: Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 &amp; No. 98); The elimination of all forms of forced and compulsory labour (Convention No. 29 &amp; No. 105); The effective abolition of child labour (Convention No. 138 &amp;</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>No. 182); The elimination of discrimination in respect of employment and occupation (Convention No. 100 &amp; No. 111)' [Human Rights Overview, N/A: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Respect H&amp;S of workers: In its Code of Ethics the Company states: 'We are committed to maintaining a safe and healthy workplace. Our colleagues, business partners, visitors and communities deserve no less.' [Global Code of Ethics, 09/2019: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: 'Suppliers must provide their Employees safe and healthy working conditions, including potable drinking water, adequate sanitation, lighting, temperature, ventilation, and suitable facilities for women's health needs' [Global Supplier Code of Conduct, 06/2018: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.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: Regular stakeholder engagement: In its 2018/2019 CR Report, the Company indicates: 'Across our value chain, we engage with a wide variety of stakeholders to inform our corporate responsibility work and advance our company's commitments'. Examples of these initiatives are included the Corporate Responsibility Report.' It also includes a figure with engagement actions per stakeholder group, for instance with Suppliers: Regular meetings; Supplier conferences; Supplier surveys; Sedex participation; NGO partnerships; Global Supplier Code of Conduct. [Corporate Responsibility Report 2018/2019, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: We could not identify recent evidence of stakeholder design engagement. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material (deforestation and palm oil). This indicator looks for engagement with affected stakeholders that explicitly includes human rights.</li> </ul>
A.1.5	Commitment to remedy	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 remedy: The Company states in its Human Rights Position Statement, 'It is our policy that our operations should not infringe upon the inherent rights of others and that should adverse impacts be discovered, we are committed to remediation in accordance with international standards and the expectations put forth by our customers, consumers, and stakeholders for us'. [Human Rights Position Statement, 12/2016: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.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</li> <li>• Not met: Work with AG suppliers to remedy impacts: In its 2018 Global Sustainability Palm Oil Milestone, the Company states: 'We continue to be committed to working with our suppliers, our peers, industry groups, and civil society to identify issues and support best practices and remediation/mitigation efforts.' Not particular commitment found, however, to remedy adverse impacts either through the business relationship's own mechanisms or through collaborating with those business relationships on the development of third party non-judicial remedies'. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [2018 FY Global Sustainable Palm Oil Milestone, 2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul>

## 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 ILO core conventions.</li> <li>• Met: Senior responsibility for HR: The Company indicates that 'At the day-to-day level, human rights issues are collaboratively managed through various functions and have been embedded into the operational responsibilities of relevant roles'. See below more detailed information. The Chief Sustainability Officer reports to Senior Vice President of Corporate Affairs who reports and updates the CEO and board regarding annual targets and performance'.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Company disclosed to the CHRB 'At the day-to-day level, human rights issues are collaboratively managed through various functions and have been embedded into the operational responsibilities of relevant roles. At the global level, day-to-day oversight of human rights is coordinated by the global sustainability team, which communicates expectations and strategy for implementation with supply chain partners and publicly reports global progress against salient human rights metrics. Each region, North America, Latin America, Asia-Pac, and Europe, has a regional responsible sourcing manager within their procurement departments to support and manage human rights related activities such as projects, pilots, or capability building workshops. They are also responsible for communicating to category managers human rights considerations during sourcing and category strategy events and assessing potential mitigation efforts. The responsible sourcing managers also track supplier performance and regional KPIs for metrics related to human rights. These roles report to their regional procurement directors and are accountable for achieving the human rights related regional metrics goals set forth by global sustainability each year. The global director of supplier engagement and development coordinates the reporting of regional execution with the global sustainability team. The Chief Sustainability Officer shares monthly progress with regional and global leadership. [...] Other functions involved in the day-to-day management of human rights issues are Ethics and Compliance, which is responsible for the implementation of policy for internal and supply chain operations, Human Resources, which incorporates human rights criteria into their internal audit processes and ensure dissemination of policy and practice throughout our manufacturing operations, and Legal, which verifies that policies and procedures are in line with international and national laws and standards such as the ILO and the UNGPs. Each function is involved in decisions related to salient industry issues such as child labor, forced labor, freedom of association and collective bargaining, health and safety, land rights, water and sanitation, and women's rights. Representatives from each function sit on a human rights focused cross-functional team that meets monthly to ensure coordination of execution and global strategy'. [Engagement Feedback, 09/08/2018]</li> <li>• Met: Day-to-day responsibility for AG in supply chain: The Company has responsible sourcing managers in each world region and are responsible for communicating to category managers human rights considerations during sourcing and category events and assessing potential mitigation efforts. See details above. [Engagement Feedback, 09/08/2018]</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 has disclosed to CHRB 'Kellogg utilizes similar metrics to assess risk within both owned and extended supply chain supplier operations. These risk factors include "regional location of operations, sector or commodity, degree of salience to industry identified issues, and supplier specific information". The Company also discloses ' For regional human rights risks, we reference a number of open source, regularly updated, subject matter expert publications such as the U.S Department of Labor ILAB, the Trafficking In Persons report from the U.S State Department, NGO and non-profit reports, industry and commodity specific guidance, and collaborative peer researched data. Through our involvement and participation in various industry and international stakeholder groups such as AIM-Progress, CGF, and the U.N. Global Compact, we are able to stay informed of situations that may affect the human rights landscape in various regions, sectors or commodities, and degree of salience to business operations.' [Engagement Feedback, 09/08/2018 &amp; Progress Against Forced Labor: 2017, 05/2018: <a href="http://kelloggs.co.uk">kelloggs.co.uk</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Identifying risks in AG suppliers: The Company states that it 'utilizes a combination of publicly available indices from reputable sources and Sedex to assess forced labour risk for supplier operations. Risk factors include regional location of operations, sector or commodity, degree of salience to industry identified issues, and supplier specific information. In 2018, Kellogg also began using the service SmartRisk to send real time risk alerts gleaned from various online sources to our Procurement department and other related functions to increase response time to issues as they become known'. In addition, the Company reports in its Human Rights Milestone 2019: 'In 2020, Kellogg and ELEVATE are kicking off phase 2 of this engagement to assess prioritized high risk Tier facility sites. Assessments are tailored to evaluate the salient rights risks identified by Kellogg based on facility location and supplier type. This work is a continuation of the 2019 supplier segmentation process and will continue into 2021' [Corporate Responsibility Report 2018/2019, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a> &amp; Human Rights Milestones 2019, 07/2020: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>] Score 2</li> <li>• Met: Ongoing global risk identification: The Company has disclosed ' New business relationships, from new supplier engagement to joint ventures and acquisitions, are assessed in accordance with current human rights due diligence practices. Risk of actual or potential human rights issues are reviewed in relation to geographical location, type of production, commodity, or service, and level of risk associated with our most salient industry and operational issues. We also review workforce demographics for the presence of potentially vulnerable workers such as contracted or migrant employees. For high-risk operations or locations, we request further information through third-party audit compliance verification'. [Engagement Feedback, 09/08/2018]</li> <li>• Not met: In consultation with stakeholders</li> <li>• Met: In consultation with HR experts: The Company indicates that 'In 2015 we commissioned a report from Verisk Maplecroft to assess potential social and supply continuity risks to our organic green apple supply'. In addition, in its KTC (know the chain) Disclosure, it states: 'In 2019, Kellogg partnered with Elevate Limited to update our salient human rights risks and segment our supply base for targeted engagements. From this analysis we identified seven salient risk issues: forced labor, child labor, migrant labor, health &amp; safety, discrimination &amp; harassment, wages, and working hours. Through available internal data, Elevate also identified 4 key supplier risk segments based on commodity, geography, and leverage: Priority, Moderate, Specialized, and Maintenance'. [Progress Against Forced Labor: 2017, 05/2018: <a href="http://kelloggs.co.uk">kelloggs.co.uk</a> &amp; Know the Chain Addition Disclosure 2020, 2020: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Triggered by new circumstances: The Company has disclosed ' New business relationships, from new supplier engagement to joint ventures and acquisitions, are assessed in accordance with current human rights due diligence practices'. [Engagement Feedback, 09/08/2018]</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: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company states " In conjunction with the global risk analytics firm Verisk Maplecroft, Sedex uses hundreds of human rights indices to determine regional and sector specific levels of inherent risk. Based on these assessments, we are prioritizing our suppliers risk and engaging those that fall into higher risk categories. Those that continue to indicate high levels of risk are targeted for independent, third-party social and ethical audits." [Human Rights Position Statement, 12/2016: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company also describes how they convene a cross-functional team comprised of Sustainability, Communications, Human Resources, Procurement, EHS, and Legal that meets monthly to assess and track the Company's global activities and inform policy and strategy regarding human rights. 'Each group is involved in decisions related to salient industry issues such as child labor, forced labor, freedom of association and collective bargaining, health and safety, land rights, water and sanitation, and women's rights.' [Progress Against Forced Labor: 2017, 05/2018: <a href="http://kelloggs.co.uk">kelloggs.co.uk</a>] Score 2</li> <li>• Met: Both requirements under score 1 met: As above.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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: Action Plans to mitigate risks: In its 2018 Human Rights Report, the Company discloses its Action Plan to face human rights issues, which includes the following actions: 'OWN OPERATIONS: Continue SAQ gap analysis, and cross functional review for all owned manufacturing facilities; Develop a robust recruitment agency assessment program to ensure compliance and protection for contracted workers in our Asia Pacific facilities; Develop and implement internally initiated third party audit cadence for owned facilities to verify on site processes and review implementation procedures on a case by case basis. SUPPLY CHAIN: Continue our bi annual survey and supplier engagement programs for our high risk categories palm oil and sugar cane to understand supplier capabilities and status and look for collaborative opportunities; Continue to sponsor and coordinate on the ground supplier capability building; Partner with Elevate to reassess salient human rights risks and develop targeted engagement plans for supplier segments.' [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: Including in AG supply chain: See above. In addition, an example of specific conclusions and actions related to a human rights issue that came about as a result of the risk mitigation process can be found in the Progress Against Forced Labour 2017 with the Organic Apples - Turkey section . This case study highlights how remediation efforts were triggered as a result of a risk assessment review of the area's organic apple supply chain. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; Progress Against Forced Labor: 2017, 05/2018: <a href="http://kelloggs.co.uk">kelloggs.co.uk</a>]</li> <li>• Met: Example of Actions decided: The Company states "Should a critical violation of our policies, such as an incidence of Involuntary Labour, be reported or uncovered, Kellogg has an escalation procedure in place to ensure rapid response and immediate mitigation and remediation of the issue." and describes "The suspension of the RSPO certification of IOI Group on March 25 means that Loders Croklaan is no longer in compliance with our palm oil policy and commitments. In January 2016, Kellogg began the process of removing this supplier from our supply chain. As of March, 67% of Loders volume has been transitioned to other suppliers in compliance with our policy. The remaining Loders volume (6% of global Kellogg palm usage) was transitioned over the next 90 days." No new relevant evidence in last year report. [Corporate Responsibility Report 2017/2018, 05/2018]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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	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: System to check if Actions are effective: The Company disclosed the following information to the CHRB: 'Tracking actions taken in response to human rights risks and impacts, including communication of outcomes and learnings and assessment of effectiveness, are conducted by the team that responded to the initial issue.- Issues raised through our Ethics and Compliance mechanisms are logged and tracked in a central location with resolutions and applied learnings. - Issues raised through global or regional Rapid Response Teams are handled directly by the team in conjunction with affected parties and internal stakeholders. Resolution and potential future implications are tracked and monitored. Policy or procedural changes, if warranted, undergo a global stakeholder review process. - Issues raised through the audit process are handled as follows: "Should a critical violation be uncovered during any of these processes Kellogg has a Critical Response Action Plan to alert senior executives and assess plans for immediate remediation of the issue(s). These are reviewed on a case-by-case basis and next steps executed accordingly, relevant to risk to affected people, communities, and business operations. Non-critical violations are managed through the supplier and the third-party audit body. Tracking of resolution of these issues is done through Sedex and internal Kellogg systems with the expectation that suppliers complete the Corrective Action Plan requirements agreed to during the audit'. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Lessons learnt from checking effectiveness: The Company discloses in their Progress Against Forced Labour document 'Complaints and inquiries are assigned to regional compliance leads for review and resolution, consistent with our investigation protocols. Most investigations can be completed quickly. Our goal is to complete investigations within 30 days. However, completion timelines may vary depending upon additional factors such as the availability of witnesses, etc. Appropriate action is taken, based on investigation findings. Lessons learned are leveraged to prevent and detect future misconduct, ensure compliance, and identify any other opportunities for improvement'. However, this indicator requires an actual example of lesson learnt as a result of the due diligence process/risk mitigation process. Current evidence seems to refer to the grievance mechanism process. [Progress Against Forced Labor: 2017, 05/2018: <a href="http://kelloggs.co.uk">kelloggs.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met: As above.</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>• Met: Comms plan re action plans for risks: See indicator 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 [Progress Against Forced Labor: 2017, 05/2018: <a href="http://kelloggs.co.uk">kelloggs.co.uk</a> &amp; Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</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 [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Responding to affected stakeholders concerns: The Company details examples of responses to specific human rights concerns raised by, or on behalf of, affected stakeholders and subsequent communication processes in the Kellogg Global Palm Milestones January to June 2017. [H1 2017 Global Sustainable Palm Oil Milestones, 06/07/2017: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: Ensuring affected stakeholders can access communications: The Company indicates on its Ethics Line website: 'After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password, and keep them in a safe place. After 5-6 business days, use your report key and password to check your report for feedback or question.' In addition, the Company reports the state of grievances received in its 'Palm Oil Grievance Tracker' document. However, it is not clear whether all human rights grievances are included in the 'Pal Oil Grievance Tracker'. This indicator looks for evidence of how the Company publicly sows how it responded to affected stakeholders that raised concerns, and ensures they have access to these communications. [Ethics Point -Ethics Line, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</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: In accordance with the Company Code of Ethics, reports can be made to Office of Ethics and Compliance via several different procedures. In addition, it has Ethics Alertline which is maintained by a third-party confidential reporting company. Office of Ethics and Compliance then receive reports from the company for investigation and follow-up. Calls are answered in local languages. [Global Code of Ethics, 09/2019: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company discloses information about its grievance channels: its Ethics Hotline and MyHR Portal. In its Ethics Hot line, the Company received 324 complaints (none of Forced Labor) and in MyHR Portal it received 324 complaints (230 related to HR, diversity and workplace respect, none of them about Forced Labor). It also reports that it closed 311 complaints from its Ethics Hot line and substantiated 92 cases. However, it is not clear how many human rights complaints were filed overall, and closed or addressed. [Human Rights Milestones 2019, 07/2020: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages: It also indicates in its Human Rights report that its 'Hot Line is operated for Kellogg by a third party, confidential reporting company and always available to over 30,000 Kellogg employees in 18 countries in the caller's local language'. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: Expect AG supplier to have equivalent grievance systems: Regarding supplier specific requirements, as stated in the Global Supplier Code of Conduct, "Suppliers shall provide means for confidential complaint/concern reporting to all Employees, taking into consideration the best practice guidelines highlighted in the UN Guiding Principles. Issues should be addressed in a timely and respectful manner and include documentation of corrective actions. In addition to this, we encourage Suppliers to communicate the availability of Kellogg Company's ethics hotline as a way for Employees throughout our collective supply chain to report grievances." [Global Supplier Code of Conduct, 06/2018: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: Opens own system to AG supplier workers</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 states in its Human Rights Milestone 2019: 'Our Ethics Hot Line offers a confidential way for employees, suppliers, contractors and the general public to ask questions and report concerns in relation to ethics, compliance or any other requirements in our Code immediately and anonymously 24 hours a day, 7 days a week via telephone, internet or mobile app'. [Human Rights Milestones 2019, 07/2020: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: Country and language specific accessibility is provided for all countries of operations. Local numbers can be accessed through the Global Ethics and Kellogg Alterline homepage. The Ethics Line website is available in 15 languages. [Kellogg's Company website, N/A: <a href="http://kelloggcompany.com">kelloggcompany.com</a> &amp; Ethics line - FAQ, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems: The supplier code indicates that 'suppliers shall provide means for confidential complaint/concern reporting to all Employees, taking into consideration the best practice guidelines highlighted in the UN Guiding Principles'. However, no evidence found of the Company expecting suppliers to have the mechanism open to all external stakeholders. [Global Supplier Code of Conduct, 06/2018: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: AG supplier communities use global system: Ethics hotline is open for Company's employees, suppliers and contractors. However, it is not clear whether is open also to all suppliers potentially affected external stakeholders. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</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: The Company reports the state of grievances in its 'Palm Oil Grievance Tracker' document. With respect the grievance raised by Greenpeace, RAN, IRLF, etc. on September 2019 related to 'Extensive labour rights abuses have been documented in FGV's Malaysian operations, including workers having to pay recruitment fees and having their passports retained by the company', the Company indicates the following action: 'On 21 November 2019, FGV announced that they have been accepted as a Participating Company of the Fair Labor Association (FLA). Under this affiliation programme, FGV is also expected to align its internal standards with the FLA Workplace Code of Conduct as well as to develop a comprehensive social compliance and remediation programme based on the Code of Conduct and the Principles of Fair Labor and Responsible Sourcing or Production for Agricultural Supply Chains.' However, no further information found, including description of how remedy has been provided. [Palm Oil Grievance Tracker, 02/2020: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: Says how it would remedy key sector risks: The Company discloses to the CHRB 'At Kellogg, the process for providing or enabling timely remedy for victims of adverse human rights impacts is "to complete investigations within 30 days. However, completion timelines may vary depending upon additional factors such as the availability of witnesses, etc. Appropriate action is taken, based on investigation findings. Lessons learned are leveraged to prevent and detect future misconduct, ensure compliance, and identify any other opportunities for improvement.' However, this is just the process for the grievance mechanism, and</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>does not detail how remedy is provided. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <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: The Company indicates in its Human Rights Milestone 2019 with respect its grievances mechanisms: 'Lessons learned are leveraged to prevent and detect future misconduct, ensure compliance, and identify any other opportunities for improvement'. However, no further details found, including approach to introduce changes. [Human Rights Milestones 2019, 07/2020: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</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		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Kellogg faces social allegations over its palm oil sourcing in Indonesia</li> <li>• <b>Area:</b> Child labour / Forced labour</li> <li>• <b>Story:</b> On November 30th 2016, Amnesty International published a report in which it accused Wilmar and Wilmar's major clients including Unilever, Kellogg's, Reckitt Benckiser, Colgate-Palmolive and Nestlé of human rights violations in its palm oil supply chain processes in Indonesia. These companies are alleged to have been complicit in the use of child labour and forced labour, with workers subjected to poor working conditions. They are also accused of contributing to deforestation and the extinction of rare species in Indonesia, endangering workers' health through exposure to dangerous chemical herbicides and failing to provide safety equipment. In addition, labourers allegedly work for around 10 to 11 hours a day without adequate pay, while children allegedly work from the age of eight. Amnesty vowed to conduct a campaign to ask if the companies' products are issued from Wilmar activities in Indonesia.</li> </ul> <p>In March 2017, Amnesty repeated its accusations claiming the situation had not been resolved and alleging that Wilmar was continuing to intimidate workers to prevent them from speaking out.</p> <ul style="list-style-type: none"> <li>• Sources: [Forbes - 30/11/2016 -: <a href="http://forbes.com">forbes.com</a>][Amnesty International report, 2016 -: <a href="http://amnesty.org.uk">amnesty.org.uk</a>][Company website -: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>][Amnesty International - 30/11/2016: <a href="http://amnesty.org">amnesty.org</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	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: Public response available: See below [H1 2017 Global Sustainable Palm Oil Milestones, 06/07/2017: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The Company reports in a detailed way on its position to the case. It cited 'traceability' as a factor in why they had not been aware of abuses at the plantations supplying them palm oil through Wilmar. In its 'Milestones' 2017 Report on palm oil, Kellogg indicated that: 'We recognize the ongoing challenges associated with deforestation and peatland development and the necessity to uphold and protect the rights of workers and indigenous people'. It has also published a list of suppliers. [H1 2017 Global Sustainable Palm Oil Milestones, 06/07/2017: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: According to its website section Human Rights Overview, Kellogg supports the ILO core labour standards, as laid out in the 8 conventions, indicating which are these. [Human Rights Overview, N/A: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The Global supplier code of conduct includes commitments to child labour, forced labour and discrimination. [Global Supplier Code of Conduct, 06/2018: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: In its global supplier code of conduct, the Company expects suppliers to respect rights related child labour and forced labour. It states 'Suppliers may only utilize child labor that is permitted by International Labour Organization guidelines. Hazardous work may not be done by anyone below the age of 18 and such individuals must provide documented informed consent' and 'Suppliers must not use or facilitate any type of involuntary labor, including forced, indentured, bonded, slave or human trafficked labor. Suppliers may use Employees in an official government prison rehabilitation</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			program'. [Global Supplier Code of Conduct, 06/2018: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a> ]
E(1).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: The company says in its 2018 Human Rights Milestones report it was involved in a series of supplier workshops, where approximately 170 persons from Wilmar's supplier companies participated in the 3 workshops held over 7 months in Medan, Pekanbaru, and Jakarta, Indonesia. The speakers included representatives from government, unions, civil society, business organizations, buyers and plantations. The topics of engagement included external stakeholder concerns and expectations (supported by Amnesty International material and Better Work Indonesia), labour laws, child labour and grievance mechanisms among others. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: Encourages linked business to engage affected stakeholders: The company in its 2018 Human Rights Milestones report says "Kellogg participated in the Jakarta workshop to directly communicate our approach to sustainability, relevant policies, and expectations of our suppliers and associated upstream supply chains." However it is not clear whether the company encouraged those suppliers to engage with those affected workers in the Amnesty International report. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: There is no publicly available evidence that remedy has been provided to those affected workers referenced in the Amnesty International report.</li> <li>• Met: Has reviewed management systems to prevent recurrence: In its 'Milestones' 2017 Report on palm oil, Kellogg has provided examples on actions it has taken to improve the traceability of palm oil and in particular with Wilmar. For example, they have signed an agreement with Wilmar and BSR to conduct small- and medium-scale supplier training workshops (retro-active to November workshop), focused on addressing and mitigating labour issues, wages, employment status and grievances. In addition Kellogg's has taken other steps such as piloting a 'tool to measure and assess worker well-being at a palm oil processing facility through direct worker feedback using mobile technology' and published 'Progress Against Forced Labor Milestones report on the worker voice survey with four suppliers, one of which was a Kellogg palm oil supplier in Indonesia'. In its response to Amnesty International, Wilmar has indicated that 'in addition to the supplier compliance work and ART programme with our collaborative partner The Forest Trust (TFT), as well as the supply chain surveillance work by an international NGO partner on more than 40 palm oil companies at plantation, mill or group level, our grievance procedure is the other platform used to identify, address and monitor potential supply chain non-compliance'. [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: There is no publicly available evidence that remedy has been provided to the victims.</li> <li>• Met: Has improved systems and engaged affected stakeholders: The company says in its 2018 Human Rights Milestones report that it will undertake an action plan which includes. "Continue SAQ gap analysis, and cross-functional review for all owned manufacturing facilities, Develop a robust recruitment agency assessment program to ensure compliance and protection for contracted workers in our Asia Pacific facilities, Develop and implement internally initiated third-party audit cadence for owned facilities to verify on site processes and review implementation procedures on a case by case basis, Continue our bi-annual survey and supplier engagement programs for our high risk categories palm oil and sugar cane to understand supplier capabilities and status and look for collaborative opportunities, Partner with Elevate to reassess salient human rights risks and develop targeted engagement plans for supplier segments" [Human Rights Report 2018, 06/2019: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul>

## 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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