

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name General Mills
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 30.9 out of 100

Theme Score	Out of	For Theme
3.0	10	A. Governance and Policies
10.6	25	B. Embedding Respect and Human Rights Due Diligence
3.3	15	C. Remedies and Grievance Mechanisms
3.5	20	D. Performance: Company Human Rights Practices
6.2	20	E. Performance: Responses to Serious Allegations
4.3	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2018 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • 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: generalmills.com] Score 2 • 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. [Human rights policy on website, 05/2015: generalmills.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Human rights policy explicitly covers each ILO core are. [Human rights policy on website, 05/2015: generalmills.com] • Met: All four ILO for AG suppliers: The supplier code of conduct contains an explicit commitment to each ILO core area. [Supplier code of conduct: generalmills.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: All four ILO Core: The Human rights policy explicitly covers each ILO core area. [Human rights policy on website, 05/2015: generalmills.com] • Met: Respect H&S of workers: The Code of conduct has a commitment to provide safe and secure workplace to all employees. [Code of conduct: generalmills.com] • Met: H&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: generalmills.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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"> • Not met: Respect land ownership and resources: However, whilst it does not commit to adhering to the principles of FPIC, it has indicated in its policy on human rights, that it 'recognises the importance of land rights as well as the principle of free, prior and informed consent (FPIC)' in the context of palm oil. [Human rights policy on website, 05/2015: generalmills.com & Statement on responsible palm oil sourcing: generalmills.com] • Met: Respecting the right to water: The Company is signatory to the CEO water mandate and its water policy states that it respects 'safe and clean drinking water and sanitation as a human right that is essential for the full enjoyment of life and all human rights'. [Water policy on website: generalmills.com] • Met: Expecting suppliers to respect these rights: The Water policy states that 'water stewardship is an integral part of our effort to continually reduce the environmental impact of our operations, including the impact that occurs upstream of our own facilities'. Supplier engagement includes setting 'clear expectations that our suppliers provide a safe and healthy work environment including safe water for drinking and hygiene and they comply with all applicable environmental laws'. [Water policy on website: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure • Not met: IFC Performance Standards • Not met: FPIC for all: Although, as noted above, it has indicated in its policy on human rights, that it 'recognises the importance of land rights as well as the principle of free, prior and informed consent (FPIC)' in the context of palm oil, and its 'palm oil sourcing statement' indicates that it follows the principle of 'prevention and resolution social and/or land conflict consistent with the principle of free prior and informed consent'. [Human rights policy on website, 05/2015: generalmills.com & Statement on responsible palm oil sourcing: generalmills.com] • Not met: Zero tolerance for land grabs • Met: Respecting the right to water: See above • Not met: Expecting suppliers to respect these rights: Commitment found only in relation to water. [Water policy on website: generalmills.com & Human rights policy on website, 05/2015: generalmills.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	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"> • Met: Women's rights: The Company is signatory to the Women's Empowerment Principles. [Human rights policy on website, 05/2015: generalmills.com & Women Empowerment principles on website: generalmills.com] • Not met: Children's rights • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The Company is signatory to the Women's Empowerment Principles. [Human rights policy on website, 05/2015: generalmills.com & Women Empowerment principles on website: generalmills.com] • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
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"> • 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, assess and address areas of concern as appropriate'. [Human rights policy on website, 05/2015: generalmills.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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 following audits and where non compliances are found, supplier needs to 'remediate the concern' (or require corrective action plans). However, no formal commitment to remedy adverse impacts that it has caused or contributed to. [Human rights policy on website, 05/2015: generalmills.com & Statement on responsible palm oil sourcing: generalmills.com] Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The policy on human rights, which can be found in the news section of the Company's website, is not signed at board level. However, the 'Slavery and human trafficking statement' contains a general human rights statement, an specific commitment on forced labour, child labour and discrimination and a reference to the human rights policy which, together with the codes 'set the standards for our company, suppliers and partners regarding the protection of human rights'. This policy is signed by the CEO & Chairman. [Slavery and human trafficking statement, 02/2018: generalmills.com & Human rights policy on website, 05/2015: generalmills.com] • Met: Board level responsibility for HRs: However, the Company has indicated in its policy on human rights that 'the Public Responsibility Committee of the Board of Directors oversees our work in this area. [Human rights policy on website, 05/2015: generalmills.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs: Although the Human rights policy states that 'the Public responsibility Committee of the Board' oversees the work in this area, and the Global responsibility report indicates that this committee 'maintains responsibility for issues related to labor practices', it is not clear the process to discuss and address human rights issues at board level. [Human rights policy on website, 05/2015: generalmills.com & Global Responsibility report, 2018: generalmills.com] Score 2 <ul style="list-style-type: none"> • Not met: Examples or trends re HR discussion
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key AG HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

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"> • Met: Senior responsibility fo HR (inc ILO): 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: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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 report, 2018: generalmills.com] • Met: Day-to-day responsibility 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 report, 2018: generalmills.com]
B.1.2	Incentives and performance management	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"> • Not met: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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"> • Not met: HR part of enterprise risk system: Although the Company conducts risk assessment on direct suppliers, no evidence found on whether human rights issues are integrated as part of the broader enterprise risk management systems. [Global Responsibility report, 2018: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> • Not met: Communicates its policy to all workers in own operations: On its website, the Company indicates: ' We communicate our expectations through training opportunities and educational modules on our company intranet. Employees participate in live and online scenario-based training to illustrate ethical decision-making in daily business activities. Posters highlighting key messages from our Code of Conduct are posted in manufacturing facilities and offices. The code and posters are available in 13 languages for our global work force. Employees also have access to an intranet site dedicated to Ethics & Compliance information and resources.' Although managers must attest to compliance with the Code of conduct and the Company carries out online training in the content of the code, it does not contain human rights policies including all ILO core areas. [Global Responsibility report, 2018: generalmills.com & Code of conduct: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> • Met: Steps to communicate policy commitments to BRs: The Company indicates that ‘the Supplier code of Conduct is disseminated to suppliers through our purchase orders and supply agreements. In addition to written communication, we are beginning to integrate the Supplier Code into existing sourcing processes, supplier management tools, and eSourcing activities’. [Submission to CHRB disclosure platform, 12/2016: business-humanrights.org & Supplier code of conduct: generalmills.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Including to AG suppliers: The Supplier code states that ‘we expect you to apply similar standards to your own suppliers and subcontractors by communicating the expectations contained in this Code of Conduct and holding them accountable as well. This includes contract and seasonal workers and temporary agencies’. [Supplier code of conduct: generalmills.com] Score 2 <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, some of the ways in which the code is disseminated include purchase orders and supply agreements. [Submission to CHRB disclosure platform, 12/2016: business-humanrights.org] • Not met: Including on AG suppliers: No evidence found on whether the Company requires to suppliers to cascade the contractual or other binding requirements down their supply chain.
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Trains all workers on HR policy commitments: The human rights policy states that ‘training is an important part of effective human rights practices. We therefore undertake efforts to build awareness about our human rights policies and procedures’. However, no evidence found of details in relation to training all employees in human rights policies. [Global Responsibility report, 2018: generalmills.com & Human rights policy on website, 05/2015: generalmills.com] • Met: Trains relevant managers including procurement: The Company indicates that ‘to ensure alignment across the function, all sourcing employees complete online learning on our supplier code of conduct’. [Global Responsibility report, 2018: generalmills.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Monitoring implementation of HR policy commitments: As part of the supplier responsibility program the Company also monitors human rights in owned locations and co-packers: ‘third-party firms have conducted independent audits of our owned locations and co-packers, which cover health and safety, business integrity, human rights and environmental responsibility’. ‘In fiscal 2017, 62 of our owned locations were audited’. ‘Frequency of assessment is based on each site’s performance in past audits’. [Global Responsibility report, 2018: generalmills.com] • Met: Monitoring AG suppliers: The Company has carried out in collaboration with a third party a risk assessment and segmentation of 2,300 first-tier suppliers and those identified to be at risk are required 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, some facilities will also be required to undergo an on-site third-party audit, based on the Sedex Member Ethical Trade Audit (SMETA) protocol, covering health and safety, business integrity, human rights and environmental responsibility’. [Global Responsibility report, 2018: generalmills.com & Slavery and human trafficking statement, 02/2018: generalmills.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes corrective action process: During the audit process, ‘we require corrective plans and resolution for any identified non-compliances. The Company indicates that ‘when significant issues arise in audits, a Critical Finding Alert email is issued to key General Mills team members, including regional leadership, division counsel and subject matter experts. This group gathers to review the relationship with the facility, discuss the findings and determine next steps. A regular check-in meeting occurs to review progress the facility has made until the issue is resolved’. Although the Company disclosed the number of non-compliances in owned locations and co-packers, no evidence found of data in relation to non-compliances for suppliers (first tier-suppliers). [Global Responsibility report, 2018: generalmills.com] • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored: The Company indicates that it audited 62 of its owned locations and co-packers, representing about 25% of the total. However, no evidence found on the specific percentage of the supply chain monitored.
B.1.7	Engaging business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR affects selection of suppliers • Met: HR affects on-going supplier relationships: The supplier code of conduct states that ‘we reserve the right to terminate any agreement or arrangement with

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>you if compliance with this Code cannot be demonstrated'. The 'slavery and human trafficking statement' indicates that that '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'. [Slavery and human trafficking statement, 02/2018: generalmills.com & Supplier code of conduct: generalmills.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Met: Working with suppliers to improve performance: As part of its Sustainable sourcing commitment, the Company describes how it works with suppliers to improve performance in environmental and social areas. In coca supply chain, it indicates that 'we work directly with our suppliers to address systemic challenges and enforce our Supplier Code of Conduct'. Challenges include economic viability and child labour – 'helping families keep children in school'. Work carried out includes women's empowerment (training people on gender issues in Ghana and Ivory Coast) and children's education (financing resources for schooling). It also indicates that it works in 'farmer incomes'. It also reports supporting palm oil suppliers to increase traceability of its supply chain. [Global Responsibility report, 2018: generalmills.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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"> • Met: Stakeholder process or systems: Through 'Sustainable sourcing', the Company indicates that it commits to 'sustainable source 100% of our 10 priority ingredients by 2020'. This leads to engage to improve performance in different products, including the case of Cocoa, where it has worked towards women's empowerment and children's education to help families keep children in school. The activities included educating 1,500 people (70% women) on gender issues and provide resources to children's education. [Global Responsibility report, 2018: generalmills.com] • Not met: Frequency and triggers for engagement • Met: Workers in SC engaged: Although the 'Sustainable sourcing' focus on improving supply chain performance, examples show that this can include work with communities and workers in the supply chain in issues such as children education and women empowerment. [Global Responsibility report, 2018: generalmills.com] • Met: Communities in the SC engaged: Although the 'Sustainable sourcing' focus on improving supply chain performance, examples show that this can include work with communities and workers in the supply chain in issues such as children education and women empowerment. [Global Responsibility report, 2018: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Met: Identifying risks in own operations: The Company indicates in the responsibility report 2016 that in 2015, General Mills collaborated with a consultancy to update the company's materiality assessment and states that 'the assessment evaluated the impact each issue has on General Mills as well as the importance to external stakeholders for our company to address each issue'. Amongst others, it lists: Human rights (Respect the human rights of all workers); Smallholder farmers (Support smallholder farmers' capability and capacity to maintain viable operations); Supply chain relationships (Build and strengthen supplier partnerships across the value chain); Water stewardship (Manage water resources strategically throughout the value chain); Workplace safety (Maintain a safe workplace for our employees, contractors and visitors, with a focus on zero accidents and injuries). The same information is provided in 2018 report. [Global Responsibility report, 2018: generalmills.com & Global responsibility report, 2016: generalmills.com] • Met: Identifying risks in AG suppliers: As noted above smallholder farmers, supply chain relationships and water stewardship throughout the value chain were covered in identification. [Global Responsibility report, 2018: generalmills.com & Global responsibility report, 2016: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: In consultation with stakeholders: See above. • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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"> • Met: Salient risk assessment (and context): The Company indicates that ‘we worked with Bureau Veritas to expand and elevate our responsible sourcing program in our first-tier supplier base. After conducting a high-level risk assessment and segmentation of 2,300 first-tier supplier facilities worldwide, we identified about 1,200 facilities that have inherent risk, based on analysis of environmental, social and governance factors. We also assessed suppliers that provide raw materials or ingredients covered by our sustainable sourcing goals, as well as natural and organic products. [Global Responsibility report, 2018: generalmills.com] • Not met: Public disclosure of salient risks: Although the Company has carried out assessment of risks and identified 1,200 facilities that have inherent risk, it is not clear which are the human rights risks found as a result of the process. [Global Responsibility report, 2018: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Met: Action Plans to mitigate risks: The Company indicates 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 some facilities will undergo audits/monitoring process based on Sedex. [Global Responsibility report, 2018: generalmills.com] • Not met: Example of Actions decided • Met: Including in AG supply chain: As noted above, the actions taken refer mainly to the supply chain. [Global Responsibility report, 2018: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
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"> • Met: Comms plan re identifying risks: The Company has communicated in its global responsibility report its system to identify human rights risks and impacts including own operations and supply chain (see B.2.1). [Global Responsibility report, 2018: generalmills.com] • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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"> • Met: Channel accessible to all workers: The Code of conduct provides different ways in which the Company's employees can report a violation, including contacting managers from different departments, contacting the ethics line online, and calling the ethics line (different numbers for different countries provided). These mechanisms are also referred in the human rights policy. [Code of conduct: generalmills.com & Ethicspoint: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: Although the code of conduct discloses a large list of countries and phone numbers, it only clarifies specific languages in some of them. On its website, however, it provides 12 different languages to use the channel. [Code of conduct: generalmills.com & Ethicspoint: secure.ethicspoint.com] • 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: generalmills.com]
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"> • 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. [Submission to CHRB disclosure platform, 12/2016: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: See above. The Ethics Point is available in 13 languages (including Chinese, Korean, Thai, among others). [Ethicspoint: secure.ethicspoint.com] • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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"> • Not met: Response timescales • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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"> • Met: Public statement prohibiting retaliation: The Code of conduct indicates that 'the Company will not retaliate against you for marking a good faith report about a questionable business practice or behaviour'. A commitment to not retaliate is also made on the ethics point website. The Company indicates in its disclosure to CHRB that anyone can use the ethics line. [Code of conduct: generalmills.com & Submission to CHRB disclosure platform, 12/2016: business-humanrights.org] • Met: Practical measures to prevent retaliation: The ethics line is handled by a third party. In addition, the anonymous reporting is possible both through the telephone and website reporting mechanisms. [Code of conduct: generalmills.com & Ethicspoint: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Living wage in supplier code or contracts: The Company indicates in the supplier code of conduct that 'you will provide employees with compensation that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards'. However, more details are required in relation to what needs the wage should cover. [Supplier code of conduct: generalmills.com] Score 2 <ul style="list-style-type: none"> Not met: Improving living wage practices of suppliers Not met: Both requirements under score 1 met Not met: Provides analysis of trends in progress made
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Avoids business model pressure on HRs (purchasing practices) Not met: Positive incentives to respect human rights (purchasing practices): The Company indicates that it gives preference to RSPO certified sustainable palm oil and in its process to trace the palm oil supply chain it indicates that 'we are very supportive of those suppliers who have been publicly transparent about their upstream supply and it is now an expectation for all our palm oil suppliers'. However, although the Company is working towards supplying from sustainable sources, it is not clear whether it establishes specific positive incentives based on criteria that includes human rights performance on a general basis. [Statement on responsible palm oil sourcing: generalmills.com & Global Responsibility report, 2018: generalmills.com] Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Identifies suppliers back to manufacturing sites (factories or fields): The Global responsibility report states that in 2017 the Company conducted, in collaboration with Bureau Veritas, a 'high-level risk assessment and segmentation of 2,300 first-tier direct supplier facilities worldwide'. It also indicates that 'we also assessed suppliers that provide raw materials or ingredients covered by our sustainable sourcing goals, as well as natural and organic products. During fiscal 2018, we plan to assess additional direct suppliers and also include indirect suppliers'. However, it is not clear whether the Company has mapped these suppliers and facilities and maps indirect suppliers (the Company defines indirect suppliers as those that provide 'products or services such as office supplies, telecommunications, and travel that support our business more generally', not suppliers beyond tier one). Finally, the Company indicates that it started to map supply chain of sugarcane. [Global Responsibility report, 2018: generalmills.com] Score 2 <ul style="list-style-type: none"> Not met: Discloses significant parts of SP and why: The Company provides the names of global direct palm oil suppliers, and the lists of mills supplying its direct suppliers (name, country and coordinates). However, no evidence found of the Company disclosing the mapping of the most significant parts of its supply chain (and defining how it defines that are the most significant). [Statement on responsible palm oil sourcing: generalmills.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	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"> • Not met: Child Labour rules in codes or contracts: The supplier code of conduct contains a commitment on child labour. It also indicates that 'young employees under the age of 18 will not work at night, in hazardous conditions or in work that interferes with schooling. However, no evidence found in relation to guidelines on age verification and remediation programmes. [Supplier code of conduct: generalmills.com] • Not met: How working with suppliers on child labour: The Company indicates that in cocoa supply chain child labour is a challenge, and provides an example of working carried out to help families keep children in school in Ivory Coast, where the Company funds children's education. It provided 700 school kits and backpacks to vulnerable children. However, an example of working with communities to improve access to education is not enough as a description to show how works with suppliers to eliminate child labour and improve working conditions for young workers. [Global Responsibility report, 2018: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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"> • Met: Debt and fees rules in codes or contracts: The supplier code states that 'you will not use involuntary labor or require payment of fees or the surrendering of identification as a condition of employment. All employees will understand the terms of their employment'. The Company also indicates in the 'slavery and human trafficking statement' that it's fully supportive of the Consumer Goods Forum's 'Forced Labor Resolution and Priority Principles: every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work'. [Supplier code of conduct: generalmills.com & Slavery and human trafficking statement, 02/2018: generalmills.com] • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.d	Forced labour: Restrictions on workers (in the supply chain)	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"> • Met: Free movement rules in codes or contracts: The supplier code states that 'you will not use involuntary labor or require payment of fees or the surrendering of identification as a condition of employment. All employees will understand the terms of their employment'. The Company also indicates in the 'slavery and human trafficking statement' that it's fully supportive of the Consumer Goods Forum's 'Forced Labor Resolution and Priority Principles: every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work'. [Supplier code of conduct: generalmills.com & Supplier code of conduct: generalmills.com] • Not met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	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"> • Not met: FoA & CB rules in codes or contracts: Its Suppliers Code of Conduct indicates: 'You will recognize and respect the rights of employees to freedom of association and collective bargaining. [...] You will prohibit unlawful retaliation against employees who report a compliance or ethical issue learned during the course of work performed for General Mills, or who cooperate in good faith with the investigation of a complaint.' However, there are no guidelines related to prohibition of intimidation, harassment and violence against union members and union representatives. [Supplier code of conduct: generalmills.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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"> • Met: Sets out clear Health and Safety requirements: The Supplier code includes the following guideline: 'We require that you will provide employees with a safe, clean and healthy work environment. You are also responsible for integrating comprehensive health and safety management practices and job-specific safety training into your business. Employees will have the right to refuse and report unsafe or unhealthy working conditions. You will meet or exceed applicable laws and industry standards in this area'. [Supplier code of conduct: generalmills.com] • Not met: Injury Rate disclosures: Only for its own employees [Global Responsibility report, 2018: generalmills.com] • Not met: Lost days or near miss disclosures: Only for its own employees [Global Responsibility report, 2018: generalmills.com] • Not met: Fatalities disclosure: Only for its own employees [Global Responsibility report, 2018: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.1.8.b	Land rights: Land acquisition (in the supply chain)	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"> • Not met: Rules on land & owners in codes or contracts: The palm oil sourcing statement indicates that it will only source from suppliers that meet specific principles, including 'prevention and resolution of social and/or land conflicts consistent with the principle of free prior and informed consent'. However, no details found in relation to the requirements to have a process to identify legitimate tenure rights holders in palm oil and other relevant supply chains. [Statement on responsible palm oil sourcing: generalmills.com] • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in the progress made
D.1.9.b	Water and sanitation (in the supply chain)	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"> • Not met: Rules on water stewardship in codes or contracts: Regarding suppliers, the Company's water policy states that it sets 'clear expectations that our suppliers provide a safe and healthy work environment including safe water for drinking and hygiene'. However, no evidence found of specific guidelines in the supplier code of conduct or in other supplier contractual arrangement in relation to access to safe water. [Water policy on website: generalmills.com & Supplier code of conduct: generalmills.com] • Met: How working with suppliers on water stewardship issues: The Company indicates that improving watershed health 'requires extensive collaboration to protect the water quality and supply that benefit growers, communities and the environment'. The Company's water stewardship plans cover both its operations and supply chain: 'water issues are local, so we take a risk-based approach to address specific challenges facing targeted geographies. We follow our four-phase approach to develop and implement watershed health strategies in eight priority watersheds'. 'We assessed 15 key ingredients in 36 sourcing regions and 66 facilities (including 17 supplier partners), covering 41 watersheds globally'. The four-phase approach includes establishing multi-stakeholder water stewardship plan to implement identified improvements'. [Global Responsibility report, 2018: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.1.10.b	Women's rights (in the supply chain)	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"> • Not met: Women's rights in codes or contracts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on women's rights: The Company provides different examples on its work on women's empowerment. It has a supplier diversity team embedded in global sourcing to build partnerships across the Company to match diverse suppliers with business needs and opportunities. It also provides training to sourcing buyers in North America to incorporate diversity into strategic plans (spending in diverse suppliers including women, veteran, LGBTQ and others). In addition, in the Cocoa supply chain the Company reports that in Ivory Coast it focused in women's empowerment, educating in gender issues. In the context of supplier diversity, the Company states that it participates in the Women's Business Enterprise National Council and the Women's Business Development Center. 'Through these organizations and other industry groups, we benchmark, share best practices and network with prospective diverse suppliers'. [Global Responsibility report, 2018: generalmills.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity thresholds were found, and so the score of 24.71 out of 80 points scored in themes A-D & F has been applied to produce a score of 6.18 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.29 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, General Mills made data public that met one or more elements of the methodology in 24 cases, leading to a disclosure score of 2.29 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Global Responsibility report includes a Global Reporting Initiative index. [Global Responsibility report, 2018: generalmills.com]
F.3	Key, High Quality Disclosures	0 out of 4	General Mills met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

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 2018 Key Findings report for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHR B Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHR B Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHR B Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHR B Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHR B Ltd, 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.