

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Kellogg  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 57.5 out of 100

Theme Score	Out of	For Theme
6.7	10	A. Governance and Policies
18.1	25	B. Embedding Respect and Human Rights Due Diligence
6.3	15	C. Remedies and Grievance Mechanisms
9.5	20	D. Performance: Company Human Rights Practices
12.5	20	E. Performance: Responses to Serious Allegations
4.5	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: The Company states in its Human Rights Position Statement that Company is 'committed to respecting human rights in accordance with international standards like the International Labour Organization, U.N. Guiding Principles, and the Universal Declaration of Human Rights.' [Human Rights Position Statement, 42705] • Met: UNGC principles 1 & 2: The Company is a signatory to the UNGC. Score 2 • Not met: UNGPs • 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: Kellogg is a member of the UN Global Compact, and supports the ten principles. Its Code of Ethics states that 'it is committed to maintaining a safe and healthy workplace for our colleagues, business partners and visitors as well as people in the communities in which we operate.' The Company states that 'we are committed to maintaining an ethical and transparent supply chain free of forced labour, including slavery and human trafficking. Its Global Supplier Code of Conduct includes all ILO core labour standards as well as health and safety commitments. [Code of ethics, 41547 & Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: All four ILO for AG suppliers [Global Supplier Code of Conduct, 41654: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: All four ILO Core: The Company commits to the ILO standards in their Human rights and Supplier Human Rights policy. In their Process Against Forced Labour Document the Company clarifies the core labour standards that they refer to when they commit to the "ILO core labour standards". The company lists: "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:               <ul style="list-style-type: none"> <li>• Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 &amp; No. 98)</li> <li>• The elimination of all forms of forced and compulsory labour (Convention No. 29 &amp; No. 105)</li> <li>• The effective abolition of child labour (Convention No. 138 &amp; No. 182)</li> <li>• The elimination of discrimination in respect of employment and occupation (Convention No. 100 &amp; No. 111)" [Progress Against Forced Milestones, 2017]</li> </ul> </li> <li>• Met: Respect H&amp;S of workers</li> <li>• Met: H&amp;S applies to AG suppliers</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Respect land ownership and resources: The Company states that it respects Land Tenure Rights, including the rights of indigenous and local communities to give or withhold their Free, Prior and Informed Consent to all new development or operations.' [Palm Oil Commitment, 2016 &amp; Global Sustainability 2020 commitments, 42794]</li> <li>• Met: Respecting the right to water: Kellogg states that it respects the human right to water as defined by the United Nations Committee on Economic, Social and Cultural Rights and General Assembly. [Global Sustainability 2020 commitments, 42794]</li> <li>• Met: Expecting suppliers to respect these rights: The Global Supplier Code of Conduct states that 'suppliers must respect the land rights of women and communities affected by their operations and sourcing practices, and must ensure transparent reporting and disclosure of concession agreements and/or operating permits to affected communities. Suppliers must ensure fair negotiation on land transfers and must refrain from cooperating with any host government's illegitimate use of eminent domain to acquire land that will be used to provide products and services to Kellogg, adhering to the principle of Free, Prior and Informed Consent. Suppliers must identify small-scale producers to ensure they have access to fair market value for their crops, goods or services.' [Global Supplier Code of Conduct, 41654: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure</li> <li>• Not met: IFC Performance Standards</li> <li>• Met: FPIC for all</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Met: Respecting the right to water</li> <li>• Met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Women's rights: The Company has a public commitment to respect women's rights. In addition, Kellogg states that it respects the human right to water as defined by the United Nations Committee on Economic, Social and Cultural Rights and General Assembly. [Global Sustainability 2020 commitments, 42794]</li> <li>• Not met: Children's rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Met: Expects suppliers to respect these rights: The Company has a public commitment to respect women's rights and supports the UN's Women's Empowerment Principles. It states in its Global Supplier Code of Conduct that expects suppliers to support these commitments in its supplier agreements. [Global Sustainability 2020 commitments, 42794]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: Kellogg is a signatory to the Women's Empowerment Principles. [BHRC Company response, 43229: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Expecting suppliers to respect these rights: The Company has a public commitment to respect women's rights and supports the UN's Women's Empowerment Principles. It states in its Global Supplier Code of Conduct that expects suppliers to support these commitments in its supplier agreements. [Code of ethics, 41547 &amp; Global Supplier Code of Conduct, 41654: <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: Commits to stakeholder engagement: The Company states 'As we work with our industry partners, our suppliers, and stakeholders we will continue to evolve in this space as we seek to advance our commitments to respect and protect the rights of those affected both directly and indirectly by our operations.' The Company also discloses 'As our programs evolve we seek to further engage with a wide range of potentially and actually affected stakeholders, including those in the local communities that support our operations throughout the world. In 2017 we will be continuing our work with the Kellogg Grower Survey to reach 1,200 farmers in 21 countries to assess and support climate smart agriculture practices for our priority row crop and fruit ingredients as well as farmer livelihoods.' [2016 Year-End Sustainability Milestones, 2016: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> <li>• Not met: Regular stakeholder engagement</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: The Company discloses 'Our work in sugar cane has involved developing and delivering training materials for Latin American cane workers in a jointly funded project facilitated by Solidaridad and Bonsucro, both of whom directly engaged with workers to assess and prioritize topics for targeted training materials. Our work with AIM-Progress peers and La Gloria Mill in Veracruz Mexico has been facilitated through ABC Mexico. We co-hosted and presented at the initial supplier capability building training workshop which was attended by worker representatives, supplier management, traders, refiners, NGOs, and 4 Mexican government Secretariats. The group discussed current needs and priorities for on the ground intervention and support. As a result of the engagement and training workshop, a project to improve access to water, rest, and shade for La Gloria Mill cutters was commissioned and has since begun. 'However, it is not clear whether stakeholders are involved in the development of the broader human rights approach. [2016 Year-End Sustainability Milestones, 2016: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</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, 42705]</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</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its Code of Ethics that "We help each other by speaking out when a co-worker's conduct makes us uncomfortable" and "Acts of violence, threats and physical intimidation have no place at Kellogg and can result in immediate disciplinary action, up to and including termination of employment." In the Company's additional disclosure CHRB document the Company states 'Kellogg Company has a zero tolerance policy for threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations' [Code of ethics, 41547]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects AG suppliers to reflect company HRD commitments: The Company states in its Supplier Code of Conduct 'Suppliers shall not engage in any form of retaliation including threats, intimidation, physical, or legal attacks against human or environmental rights defenders, or those exercising their rights to freedom of expression, association peaceful assembly or protest against the business or its</li> </ul>

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			operations. [Global Supplier Code of Conduct, 41654: <a href="http://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a> ]

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: The Company states that "At a board level, it [HR] is managed by our Social Responsibility and Public Policy board sub-committee" and HR policy commitments are signed off by John Bryant, CEO and Chairman of the Board. [Code of ethics, 41547 &amp; Human Rights Position Statement, 42705]</li> <li>• Met: Board level responsibility for HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO: The Company reports that Alistair Hirst, Senior Vice President Global Supply Chain, was keynote speaker at the annual SEDEX conference (<a href="http://sedexglobal.com">sedexglobal.com</a> 2016 speaking about the importance of human rights and the company's commitment to human rights. However, Alistair Hirst is not a board member or CEO.</li> </ul>
A.2.2	Board discussions	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: Board/Committee review of salient HRs: The Company states 'The Social Responsibility &amp; Public Policy Committee of our Board of Directors oversees the company's sustainability efforts. All four committee members are independent. At the executive level, environmental and social issues in our supply chain are overseen by our Chief Sustainability Officer, who reports to the Vice President, Global Communications, Philanthropy and Sustainability. To help guide us as we work to achieve our Global 2020 Sustainability Commitments, we have a Sustainability 2020 Governance Team. Made up of five senior executives and led by our Chief Sustainability Officer, the team assesses progress toward the commitments, helps inform strategic decisions and addresses any barriers to achieving progress.'</li> </ul> <p>In its Corporate Responsibility report outlines the material issues covered under the 'Sustainability' scope, including human rights, among a number of other salient ESG issues. [CDP Climate disclosure 2017, 42735: <a href="http://cdp.net">cdp.net</a> &amp; Corporate Responsibility Report 2017, 43100]</p> <ul style="list-style-type: none"> <li>• Met: Examples or trends re HR discussion: The Company discloses in their Annual Shareholder Meeting 'Human rights, including forced labour, is overseen by the Social Responsibility and Public Policy committee of the Kellogg Board. Social Responsibility and Public Policy Committee. Pursuant to a written charter, the Social Responsibility and Public Policy Committee, among other things, assists the Board in discharging its oversight responsibilities with respect to certain social and public policy issues. The Committee reviews the Company's policies, programs and practices concerning public policy, government relations, philanthropic activities/charitable contributions, sustainability and related topics. The Committee is particularly focused on the intersection of philanthropy, public policy, and sustainability and the Company's goals. An update on human rights was given to this subcommittee in April, 2017.</li> </ul> <p>In addition, executive oversight is led by Diane Holdorf, Chief Sustainability Officer, and Alistair Hirst, SVP of Global Supply Chain. Leaders from Human Resources, Supply Chain, Procurement, Sustainability, and Legal work together define Human Rights strategy, identify risks, and execute strategies as part of a cross-functional Human Rights Working Group.' [Engagement Feedback, 09/08/2018]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both examples and process: As above.</li> </ul>
A.2.3	Incentives and performance management	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: Incentives for at least one board member: The Company reports monetary incentives for Supplier Engagement in its CDP Climate Change Report. In addition the Company discloses in their engagement with the CHRB 'Human Rights risks are part of the procurement supply chain metrics, and therefore contribute to overall executive performance incentives, which rolls all the way up to the CEO, who is a member of the board.' [CDP Climate disclosure 2017, 42735: <a href="http://cdp.net">cdp.net</a> &amp; Engagement Feedback, 09/08/2018]</li> </ul> <ul style="list-style-type: none"> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S: As above.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • 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"> <li>• Met: Senior responsibility fo HR (inc ILO): The Company states "Human rights are governed collaboratively at Kellogg. At the working level, it is managed by our Sustainability, Procurement, Legal, and Ethics &amp; Compliance functions. At senior leadership level, it is managed by our heads of Legal and Compliance, Human Resources and Global Supply Chain. At a board level, it is managed by our Social Responsibility and Public Policy board sub-committee." [BHRRC Company response, 43229: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <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. The Chief Sustainability Officer reports to the Senior Vice President of Corporate Affairs who reports to and updates the CEO and board regarding annual targets and performance.</li> </ul> <p>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.' [Progress Against Forced Milestones, 2017 &amp; Engagement Feedback, 09/08/2018]</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility in supply chain: The Company discloses to the CHRB '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.' [Engagement Feedback, 09/08/2018]</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights: The Company states in their 2016 Year-End Sustainability Milestones 'Our commitment to the advancement and respect of human rights begins at the top of our organization. Our policies are reviewed and approved by both our CEO and Board of Directors. Procurement leadership and category managers are responsible for execution of the Global Sustainability Commitments, including social accountability, which is reflected in</li> </ul>

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			<p>their annual performance plans and annual incentives.' [2016 Year-End Sustainability Milestones, 2016: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR part of enterprise risk system: The Company states "The Audit committee of the Board is responsible for monitoring the ERM process. Results are also shared with the Social Responsibility &amp; Public Policy Committee of the Board. The results of the risk assessment are integrated into the Board's processes. Oversight responsibility for each risk is allocated among the full Board and its Committees. Each key risk is reviewed at least annually, with many topics reviewed on several occasions throughout the year. Risks contained in the ERM process are outlined in the Corporate Responsibility report, including Human rights. [CDP Climate disclosure 2017, 42735: <a href="http://cdp.net">cdp.net</a> &amp; Corporate Responsibility Report 2017, 43100]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Communicates its policy to all workers in own operations: The Company states on its website that it uses 'interactive, immersive online training modules that highlight human rights issues like involuntary labour.' The Company states that its Code of Ethics is available in 13 languages. [Kellogg's Company website, 43229: <a href="http://kelloggcompany.com">kelloggcompany.com</a> &amp; BHRRC Company response, 43229: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Steps to communicate policy commitments to BRs: The Company states that 'we take a risk-based approach to determine which suppliers need additional awareness and education, or require verification of adherence to our policies, on this and other responsible sourcing issues.' Kellogg states that 'we proactively share best practices related to social and ethical issues with our suppliers through events such as our annual company-sponsored supplier day conferences. We are committed to actively engaging with our suppliers and their value chain network to ensure vigilance and adherence to all company policies.' The Company further states that all suppliers are required to adhere to its Supplier Code, which is included in all new supplier contracts and agreement. This is a requirement for supplier selection. [Policy Statement Prohibiting Involuntary Labor, 42523 &amp; Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: Including to AG suppliers: Kellogg actively communicates our human rights policy requirements and expectations through the supply chain by "proactively shar(ing) best practices related to social and ethical issues with our suppliers through events such as our annual company-sponsored supplier day conferences" and by being "committed to actively engaging with our suppliers and their value chain network to ensure vigilance and adherence to all company policies." Furthermore the Global Supplier Code of Conduct states "'It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification". This requirement "includes all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (each a "Supplier" and collectively "Suppliers"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all employees, including permanent, temporary, contract, foreign, or migrant workers (each an "Employee" and collectively "Employees").' [Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: These conditions are made binding by being in the Supplier Code of Conduct. Suppliers must comply at all times during the performance of its obligations under their Purchase Order with the terms of the Kellogg Supplier Code of Conduct. [Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: Including on AG suppliers: As above.</li> </ul>

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B.1.5	Training on 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: Trains all workers on HR policy commitments: The Company states in its Corporate Responsibility report that it conducts 'ongoing training on the Code for all employees and regularly review and update it as appropriate' and 'to ensure that our employees are aware of our policies, standards and expectations, we utilize interactive, immersive online training modules that highlight human rights issues like involuntary labour.' It further states that 'a more detailed training and discussion regarding the risks and implications of involuntary labour was presented to our global procurement leaders and managers during our 2015 Global Procurement Summit.' [Corporate Responsibility Report 2017, 43100 &amp; Policy Statement Prohibiting Involuntary Labor, 42523]</li> <li>• Met: Trains relevant managers including procurement: as above.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: as above.</li> </ul>
B.1.6	Monitoring and corrective actions	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: Monitoring implementation of HR policy commitments: The Company has disclosed to the CHRB 'Within our own operations, we are monitoring the implementation and compliance of our human rights commitments by ensuring our manufacturing facilities have completed and updated the Sedex Self-Assessment Questionnaire. This provides us the opportunity to review the processes and procedures in place that communicate and execute our global corporate policies and requirements. It also allows us to identify any potential gaps in implementation and share best practices throughout different regions and types of operations. As an added level of compliance verification we conduct SMETA 4-Pillar audits for select owned facilities to ensure proper implementation and execution of our internal operating procedures related to human rights.' [Engagement Feedback, 09/08/2018 &amp; Corporate Responsibility Report 2017, 43100]</li> <li>• Met: Monitoring AG suppliers: Kellogg states that it surveys and audits high-risk suppliers using the SEDEX supply chain assessment tool. The Company states that "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." The Company does not indicate that the same monitoring takes place in its own operations. [Human Rights Position Statement, 42705 &amp; Corporate Responsibility Report 2017, 43100]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Met: Discloses % of supply chain monitored: The Company states that they 'actively monitor and report metrics for the top 80% spend of our suppliers. The remaining 20% is prioritized in terms of risk. Risk factors considered are prevalence of forced labor or child labor within the commodity supply chain, inherent regional risk of human rights issues, and salience of issues to operations. In 2017 91% of in-scope global direct suppliers were registered with the Sedex platform and 53% of in-scope direct suppliers had an up to date social audit available. In 2018, we also began tracking metrics globally for indirect suppliers.' [Progress Against Forced Milestones, 2017]</li> </ul>
B.1.7	Engaging business relationships	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: HR affects selection of suppliers: The Company states in its Corporate Responsibility report that it requires the top 80% of its suppliers to join Sedex. It uses the audit information to verify whether suppliers are compliant with its Global Supplier Code of Conduct, containing details on HR standards to which suppliers must adhere. [Corporate Responsibility Report 2017, 43100]</li> <li>• Met: HR affects on-going supplier relationships: The Company states in its Supplier Code that it "reserves the right to terminate any agreement or business relationship in which a supplier does not comply with the Code." [Global Supplier Code of Conduct, 41654: <a href="http://creport.kelloggcompany.com">creport.kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: The Company states in its 2017 Corporate Responsibility report, 'all suppliers are expected to follow the Kellogg Global Supplier Code of Conduct. Additionally, the top 80 percent of our ingredient and packaging suppliers in each region, by spend, are asked to join Sedex (the largest collaborative platform for sharing ethical supply chain data) and complete a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>self-assessment to further clarify risk. Any suppliers that demonstrate “high risk” are asked to provide or complete a third-party audit for verification of compliance with the Kellogg Global Supplier Code of Conduct. We also internally assess all in-scope direct and indirect suppliers based on inherent risks of their product, service and/or country. Should we find incidents of non-compliance, we first work with the supplier to understand root causes and process improvements, hoping to implement long-term solutions. The Code states that Kellogg may cease doing business at any time if a supplier is found to be in violation. In 2016, we did so once after learning of human rights violations in the palm industry.' [Corporate Responsibility Report 2017, 43100]</p> <ul style="list-style-type: none"> <li>• Met: Working with suppliers to improve performance</li> </ul>
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"> <li>• Met: Stakeholder process or systems: The Company provides information related to stakeholder engagement within their sugar cane and organic apples operations. The Company describes multi-year projects with affected stakeholders in these two supply chains. [Progress Against Forced Milestones, 2017]</li> <li>• Not met: Frequency and triggers for engagement: The Company does not provide information regarding the frequency and triggers for engagement on human rights issues (for example by type or by stakeholder group).</li> <li>• Met: Workers in SC engaged: For example, the Company co-hosted and presented at the initial supplier capability building training workshop which was attended by worker representatives, supplier management, traders, refiners, NGOs, and 4 Mexican government Secretariats. [Progress Against Forced Milestones, 2017]</li> <li>• Not met: Communities in the SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Analysis of stakeholder views and company's actions on them: The Company discloses examples regarding engaging with stakeholders in the Sugar Cane and Organic Apples business. The Company discloses: 'Our work in sugar cane has involved developing and delivering training materials for Latin American cane workers in a jointly funded project facilitated by Solidaridad and Bonsucro, both of whom directly engaged with workers to assess and prioritize topics for targeted training materials. Our work with AIM-Progress peers and La Gloria Mill in Veracruz Mexico has been facilitated through ABC Mexico. We co-hosted and presented at the initial supplier capability building training workshop which was attended by worker representatives, supplier management, traders, refiners, NGOs, and 4 Mexican government Secretariats. The group discussed current needs and priorities for on the ground intervention and support. As a result of the engagement and training workshop, a project to improve access to water, rest, and shade for La Gloria Mill cutters was commissioned and has since begun. In 2015 we commissioned a report from Verisk Maplecroft to assess potential social and supply continuity risks to our organic green apple supply. In 2016, after determining that identified issues warranted further engagement, we partnered with our broker, primary supplier, and audit firm Control Union to conduct on-site assessments and interviews with farmers and seasonal workers to gather on the ground data regarding current or potential human rights risks. After reviewing the findings with the supplier and Control Union we supported the implementation of risk mitigation activities and policy enhancements by the supplier to remediate issues. In 2017, a second round of interviews and assessments were conducted to assess the results of those activities and the affect they had on workers and conditions. ' [Progress Against Forced Milestones, 2017]</li> </ul>



## 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"> <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 Milestones, 2017]</li> <li>• Met: Identifying risks in AG suppliers: Kellogg states that 'we utilize the online supplier management platform Sedex to identify, verify and manage risks within our supply chain. 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. ' The Company also states that "we use social and ethical compliance assessments of our own facilities to verify that Involuntary Labour does not exist within our own operations." and "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." [Global Sustainability 2020 commitments, 42794]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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>• Not met: In consultation with HR experts: The Company does not clarify that they do human rights risk assessments with human rights experts. The Company states that '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.' However, it is not clear whether this is human rights specific information. The Company does disclose in their Progress Against Forced Labour document that 'In 2015 we commissioned a report from Verisk Maplecroft to assess potential social and supply continuity risks to our organic green apple supply.' However, the Company does not describe the specific global systems in place to identify its human rights risks and impacts on a regular basis across its activities, in consultation with independent external human rights experts. [Progress Against Forced Milestones, 2017 &amp; Engagement Feedback, 09/08/2018]</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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company 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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	(salient risks and key industry risks)		<p>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, 42705]</p> <ul style="list-style-type: none"> <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 Milestones, 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: As above.</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company has disclosed to the CHRB 'To prevent and mitigate risk associated with industry and operational salient human rights issues, Kellogg utilizes due diligence processes that incorporates risk assessment, monitoring and measuring KPIs for both internal and supply chain activities, and, when warranted, third-party compliance verification. These actions are in addition to the issuance and dissemination of relevant policies and requirements such as the Kellogg Global Supplier Code of Conduct and Prohibition of Involuntary Labor Policy.' However, there is no evidence that the company actually has a plan in place. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; Policy Statement Prohibiting Involuntary Labor, 42523]</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." [Corporate Responsibility Report 2017, 43100]</li> <li>• Met: Including in AG supply chain: 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 Milestones, 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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: 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.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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," Sustainability Milestones 2016, pg. 34.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <ul style="list-style-type: none"> <li>• 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' [Progress Against Forced Milestones, 2017] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: As above.</li> </ul> </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: The Company disclosed to CHRB 'Kellogg communicates the actions and outcomes of remediation efforts in relation to human rights impacts externally through various reports and public inquiry responses. To comply with legislative requirements such as the UKMSA and CTSCA, Kellogg issues the Progress Against Forced Labor Milestones, an annual performance report detailing actions and results of activities related to salient human rights issues such as forced labor. Commodity specific actions and results can also be found in annual reporting documents such as the Responsible Sourcing Milestones and Palm Oil Milestones. For an overview of our responsible sourcing program and commitments, we issue our annual Corporate Responsibility Report for external stakeholders, consumers, and investors. In addition, we also participate in a number of external public benchmarking surveys.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Comms plan re assessing risks: The Company has communicated that it has a system to assess which are its human rights issues, including a disclosure of these (see B.2.2). [Progress Against Forced Milestones, 2017]</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Met: Comms plan re reviewing action plans: The Company has communicated that it has a system to track actions taken in response to human rights risks and impacts, and evaluating whether the actions have been effective. It communicates examples of lessons learned (see B.2.4). [Progress Against Forced Milestones, 2017 &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</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://crrreport.kelloggcompany.com">crrreport.kelloggcompany.com</a>]</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### 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"> <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. [Code of ethics, 41547] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages</li> </ul> </li></ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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, 41654: <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 Supplier Code that "any Supplier who has a product safety concern or who believes that an employee of Kellogg, or anyone acting on our behalf, has engaged in illegal, unethical or otherwise improper conduct, must immediately report the matter to our Office of Ethics and Compliance. [Global Supplier Code of Conduct, 41654: <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. [Kellogg's Company website, 43229: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Not met: AG supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system: In 2018-2019 the Company reports that they have used the 'Continue Regional Partnership to identify and implement opportunities for improvement and explore pathways to promote the Hot Line beyond our employees and contractors.' [Progress Against Forced Milestones, 2017]</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company discloses '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.' [Progress Against Forced Milestones, 2017]</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level: The Company discloses '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.' However, this is disclosed in relation to their SMETA Audit system, and not with reference to internal or external complainants utilising the Company grievance mechanisms. [2016 Year-End Sustainability Milestones, 2016: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	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 statement prohibiting retaliation: The Company states in its Code of Ethics that 'we support honest and open communication and encourage our employees to ask questions and report concerns. We will not tolerate retaliation against any individual who, in good faith, discloses any actual or suspected violations or participates in a Kellogg investigation. Retaliation will result in disciplinary action up to and including termination of employment.' [Code of ethics, 41547]</li> <li>• Met: Practical measures to prevent retaliation</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Has not retaliated in practice: The Company has disclosed to CHRB 'Kellogg has never brought a retaliatory suit against persons who have brought, or tried to bring, a case against Kellogg involving credible allegation(s) of adverse human rights impacts or against the lawyers representing them (retaliatory civil litigation, including for defamation, filing criminal complaints, or any similar actions against claimants or their lawyers), or fired any workers who have brought, or tried to bring, a case against Kellogg involving an allegation of human rights abuse, or engaged in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Expects AG suppliers to prohibit retaliation: In the Global Supplier Code of Conduct, Kellogg requires that 'Suppliers shall not engage in any form of retaliation including threats, intimidation, physical, or legal attacks against human or environmental rights defenders, or those exercising their rights to freedom of expression, association, peaceful assembly, or protest against the business or its operations.' [Global Supplier Code of Conduct, 41654: <a href="https://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</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: 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 does not detail how remedy is provided. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

### 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	<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: Living wage in supplier code or contracts: Despite the Company state in its Supplier Code that "suppliers must provide fair compensation in compliance with all applicable wage and hour laws, rules and regulations. Suppliers must provide for reasonable working hours, including maximum work hours, overtime, vacation time, leave periods, and public holidays" [Global Supplier Code of Conduct, 41654: <a href="https://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.2	Aligning purchasing decisions with human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs (purchasing practices): The Company discloses in their 2016 Year-End Sustainability Milestones, "We recognize the important role our procurement functions have in advancing our global responsible sourcing commitments. Engaging and partnering with our suppliers throughout the value chain is essential to our work in the areas of human and workplace rights, environmental protection, and sustainable farming. We set clear expectations, seek to drive accountability, and assess potential and actual risk that our supply chain operations may cause or contribute to both directly and indirectly. This means that we hold our suppliers and their operations to the same level of accountability to which we hold our own facilities and employees. Kellogg has over 20,000 suppliers globally, each a key partner in our success. Through best in class supplier engagement and development, we aim to realize the full potential of our supplier base in order to achieve a competitive advantage and support our Global Sustainability Commitments. In 2016, Kellogg began rolling out an enhanced structured supplier engagement process for holistic end to end supplier relationship management." However, the Company does not describe the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights . [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; 2016 Year-End Sustainability Milestones, 2016: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> <li>• Met: Positive incentives to respect human rights (purchasing practices): The Company discloses "In addition to monitoring our supply chain, we also recognize suppliers who have gone above and beyond to help champion Kellogg's responsible sourcing commitments. This year our Kellogg North America Procurement team awarded both Graphic Packaging International and Star of the West with our Supplier Sustainability Partnership award for their work in Packaging and Ingredients. Both companies have been instrumental in their efforts to collaborate and proactively seek out ways to support initiatives and programs related to Kellogg's 2020 Sustainability Commitments. " [2016 Year-End Sustainability Milestones, 2016: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing 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"> <li>• Not met: Identifies suppliers back to manufacturing sites (factories or fields): The Company states in is Smallholder Farmers And Women Impact Assessment that "Based on actual Kellogg sourcing volumes and locations, as well as discussions with procurement team members and suppliers, TechnoServe estimated that Kellogg supports 65,000 smallholder farmer livelihoods across 10 of our ingredients which include wheat, corn, rice, potato, fruit (berries and raisins/sultanas), palm oil, cocoa, honey and vanilla." However, these details seem focused in supporting smallholders rather than describing how it maps direct and indirect suppliers. [Kellogg's Company website, 43229: <a href="http://kelloggcompany.com">kelloggcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of SP and why: The Company has disclosed the names of all direct suppliers and the names and locations of all palm oil plantation sources. The Company identifies palm oil as being one of their highest risk categories.</li> </ul> <p>The Company stated in their 2017 H1 Global Sustainable Palm Oil Milestones 'To fully support ongoing collective efforts to increase transparency and accountability within the palm oil industry, we are releasing our full 2017 mill list. This list includes mills which may be part of the Kellogg extended supply chain due to RSPO Mass Balance purchases of palm oil.' Furthermore in this report the company has described 'Palm oil continues to be an ingredient of particular focus for Kellogg Company in our responsible sourcing efforts. Palm oil is grown and produced in Southeast Asia and is widely used in foods, soaps and cosmetics. The rapid expansion of palm oil production has been associated with human rights violations and the destruction of tropical forest habitats and peat lands.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; H1 2017 Global Sustainable Palm Oil Milestones, 06/07/2017: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	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: Child Labour rules in codes or contracts: The Global Supplier Code of Conduct states "Suppliers shall not employ anyone under the age of 15, under the minimum age of work, or under the minimum age for completing mandatory schooling as specified by local law. Suppliers must follow the higher law/requirement in instances where there is a contradiction. Suppliers shall comply with ILO Convention 138 on the Minimum Age for Admission to Employment and Work, and Convention 182 on the Elimination of the Worst Forms of Child Labour. Exceptions are subject to those allowed under national law and outlined by the ILO. Per the ILO, any work that is likely to jeopardize children's safety or physical, mental, or moral health should not be done by anyone under the age of 18." [Kellogg's Company website, 43229: <a href="http://kelloggcompany.com">kelloggcompany.com</a> &amp; Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>Met: How working with suppliers on child labour: In their Progress Against Forced Labour Milestones document the Company describes how they are working together to reduce child labour in their sugar cane and organic apples (turkey) supply chain. For example, the Company describes how in Latin America Kellogg was part of a stakeholder group with Solidaridad and Bonsucro to improve labour conditions in the sugar cane supply chain. They partnered together to develop training materials which will reach approximately 25,000 workers for 2017/2018 and help address concerns of child labour. [Progress Against Forced Milestones, 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met: As above. [Progress Against Forced Milestones, 2017]</li> <li>Met: Analysis of trends in progress made: The Company reports annually on their progress against forced labour. This reporting covers trends relating to child labour amongst their supply chain - and specifically details information with regards to the organic apples (turkey) and sugar cane supply chain. [Progress Against Forced Milestones, 2017]</li> </ul>
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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: Debt and fees rules in codes or contracts: The Company states in their Global Supplier Code of Conduct 'Suppliers must follow the "Employer Pays Principle" and adhere to the tenet of the Priority Industry Principles that "No worker should pay for a job". Employees shall not pay any fees or costs to the Supplier, Labour Agent/Agency, or any other third party associated with recruitment. Examples of fees and costs include, but are not limited to, legal fees, travel, lodging, passport and visa processing, medical exams, in-country support services, personal protective equipment, and training.' [Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>Met: How working with suppliers on debt &amp; fees: In the Company's Progress Against Forced Labour Report the Company, the Company details how after a Verisk Maplecroft assessment of exposure in their organic apples supply chain in Turkey it determined 'more investigation was needed regarding issues of migrant worker rights, forced labour, debt bondage, child labour, wages and working hours.' The Company details how they have engaged with suppliers (with the help of Control Union) which has resulted in suppliers improving annual training and implementing best practices to address these issues among its farmers and their workers. [Progress Against Forced Milestones, 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met: As above.</li> <li>Met: Analysis of trends in progress made: The Company's Progress Against Forced Labour Report provides two in depth detailed case studies - regarding their sugar can and organic apples (turkey) supply chain. These case studies include information as to how suppliers processes with regards to forced labour are improving. [Progress Against Forced Milestones, 2017]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Free movement rules in codes or contracts: The Global Supplier Code of Conduct states 'Suppliers must not restrict Employees' freedom of movement through confining, imprisoning, or detention during or outside of work hours at any location, including worksites or Employee residences in accordance with the Priority Industry Principles' tenet that "Every worker should have freedom of movement". Suppliers shall not withhold, or keep in their possession, any Employee documents or items, including passports, identity papers, jewellery, ATM cards, or land deeds. All efforts should be made to provide Employees with safe and secure locations to keep such items, which they may access at any time without notification to, or intrusion from, any other individuals.' [Global Supplier Code of Conduct, 41654: <a href="http://creport.kelloggcompany.com">creport.kelloggcompany.com</a>]</li> <li>• Not met: How working with suppliers on free movement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
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"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Global Supplier Conduct states that 'Suppliers shall comply with all applicable laws and regulations, or collective agreements, regarding maximum working hours, overtime, vacation time, leave periods, maternity/paternity leave, and public holidays.' However, there is no information regarding freedom of association in the Global Supplier Conduct. [Global Supplier Code of Conduct, 41654: <a href="http://creport.kelloggcompany.com">creport.kelloggcompany.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in progress made</li> </ul>
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"> <li>• Met: Sets out clear Health and Safety requirements: The Company sets out clear health and safety requirements in the 'Quality, Health &amp; Safety' section of the Global Supplier Code of Conduct. This covers product quality and safety, the work environment (covering potable drinking water and adequate sanitation), occupational safety, housing and emergency preparedness. [Global Supplier Code of Conduct, 41654: <a href="http://creport.kelloggcompany.com">creport.kelloggcompany.com</a>]</li> <li>• Met: Injury Rate disclosures: In its Corporate Responsibility report, the Company states 'every Kellogg workplace has an Environment, Health and Safety (EHS) Committee and our comprehensive EHS Management System provides us with important information we use to make continuous improvements across our operations. We believe all workplace accidents are preventable and are striving to achieve a zero incident rate. In the past year, we've continued to make progress toward this goal against our two primary metrics. Our Total Recordable Incident Rate fell to 1.16 and our Lost Time Incident Rate dropped to .57. Both are significantly below the industry benchmarks of 4.7 and 1.3, respectively, and near or lower than our interim goal to be a world-class company with rates of less than one.' [Corporate Responsibility Report 2017, 43100]</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosure</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.1.8.b	Land rights: Land acquisition (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"> <li>• Met: Rules on land &amp; owners in codes or contracts: The Company states in its Global Supplier Code of Conduct that "suppliers must respect the land rights of women and communities affected by their operations and sourcing practices, and must ensure transparent reporting and disclosure of concession agreements and/or operating permits to affected communities. Suppliers must ensure fair negotiation on land transfers and must refrain from cooperating with any host government's illegitimate use of eminent domain to acquire land that will be used to provide products and services to Kellogg, adhering to the principle of Free, Prior and Informed Consent. Suppliers must identify small-scale producers to ensure they have access to fair market value for their crops, goods or services." [Global Supplier Code of Conduct, 41654: <a href="http://creport.kelloggcompany.com">creport.kelloggcompany.com</a>]</li> <li>• Met: How working with suppliers on land issues</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in the progress made</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	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: Rules on water stewardship in codes or contracts: The Company states in its Global Supplier Code of Conduct that "Suppliers must provide their Employees with safe working conditions including potable drinking water, adequate sanitation, safety equipment essential for their duties, suitable facilities for women's health needs, protection from exposure to toxic or harmful chemicals (both use and storage), structurally sound facilities with safe and unrestricted ingress and egress, etc. Suppliers should document, investigate and report to the appropriate authorities any incidents which result in injury to an Employee beyond first aid. When living conditions are provided, they must be clean, safe, adequate, unrestricted and promote basic human dignity. "The Company states that 'FAO/AQUASTAT and the Water Footprint Network are used to assess several key ingredient suppliers and associated water-related business risks, overlaying our supply source locations against global water stress maps and renewable water supply projections. This includes work with the University of Minnesota Institute on the Environment to create water and climate risk maps globally for specific ingredient sourcing locations'. [Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: How working with suppliers on water stewardship issues: The Company describes how 'Kellogg is taking part in an industry group led on-the-ground project to improve cane cutter working conditions in the Veracruz region of Mexico through improvements to water, rest, and shade. We have partnered with peer companies, industry-group AIM-Progress, La Gloria Mill, and implementation coordinators ABC Mexico to build field shade shelter tents, increase access to potable water, provide additional PPE, and facilitate training for workers to learn best practices. This project will directly impact 2,100 field workers and indirectly impact over 4,000.' [Progress Against Forced Milestones, 2017]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: As above.</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts: The Company states in its Global Supplier Code of Conduct that "Suppliers must make employment decisions including hiring, payment, benefits, advancement, termination and retirement based on ability, qualifications and achievements and not on any personal characteristics. Suppliers must demonstrate that women and men with similar ability, qualifications and achievements are afforded similar work opportunities, wages, benefits, contract terms, and facilities." Additionally it states in its Sustainability Milestones that it "recognizes that women often play a significant role in agriculture, but in some countries still face challenges of injustice and inequality. Kellogg is identifying the parts of our supply chain with the highest prevalence of women, while identifying the risks and opportunities they face, depending on their communities and regions. We recognize the importance of communities' right to access and control of land, especially the land that enables food security.' [Global Supplier Code of Conduct, 41654: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> <li>• Met: How working with suppliers on women's rights: The Company has described 'Kellogg is committed to supporting women rights and empowerment in our supply chain operations. We have made the commitment that "by 2020, develop programs to help women farmers/workers improve their livelihoods, families and communities using climate-smart agriculture practices". To date, Kellogg has been able to support more than 10,000 women smallholders through various programs and initiatives.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: As above.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Provide analysis of trends in progress made: The Company disclosed to the CHRB 'To formulate the metrics that we use to measure progress against our commitments to improve livelihoods and support the empowerment of women in our supply chain, particularly smallholder farmers, Kellogg assessed the number of women farmers in our priority supply chains and mapped the risks that they face related to economic, social, and environmental issues. This information can be found in our Smallholder Farmers and Women Impact Report.' The Smallholder Farmers and Women Impact Report includes an analysis of trends among suppliers. [Smallholder Farmers and Women Impact Report, February 2015: <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a>]</li> </ul>

## 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		<ul style="list-style-type: none"> <li>• Area: Child labour / Forced labour</li> <li>• Headline: Kellogg faces social allegations over its palm oil sourcing in Indonesia</li> <li>• Sources: Amnesty International Slams Colgate, Nestlé and Unilever For Palm Oil Supply Chain Abuses" - Forbes - 30/11/2016 - <a href="http://forbes.com">forbes.com</a> <a href="http://amnesty.org">amnesty.org</a> Amnesty International report, 'The Great Palm Oil Scandal', 2016 - <a href="http://amnesty.org.uk">amnesty.org.uk</a> Huile de palme. De grandes marques mondiales tirent profit du travail des enfants et du travail forcé" - Amnesty International - 30/11/2016 Firms such as Kellogg's, Unilever and Nestlé 'use child-labour palm oil" - The Guardian - 30/11/2016 , Company website - <a href="http://crreport.kelloggcompany.com">crreport.kelloggcompany.com</a> <a href="http://amnesty.org">amnesty.org</a></li> <li>• Allegation: 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>
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</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.</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</li> <li>• Met: Policies apply to the type of business relationships involved</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 program'.</li> </ul>
E(1).3	The Company has taken appropriate action	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>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Met: Has improved systems and engaged affected stakeholders: 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 Kelloggs 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'.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Met: Has improved systems and engaged affected stakeholders</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.52 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Kellogg made data public that met one or more elements of the methodology in 37 cases, leading to a disclosure score of 3.52 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	1 out of 4	<p>Kellogg met 2 of the 8 thresholds listed below and therefore gets 1 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</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 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.

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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.