

Company Name General Mills
Industry Agricultural Products (Supply Chain only)
Overall Score 30.3 out of 100

Theme Score	Out of	For Theme
3.4	10	A. Governance and Policies
11.8	25	B. Embedding Respect and Human Rights Due Diligence
4.0	20	C. Remedies and Grievance Mechanisms
5.0	25	D. Performance: Company Human Rights Practices
6.1	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: As indicated in the human rights policy: 'We respect and acknowledge internationally recognized human rights principles. Within our Company and throughout our supply chain, we are committed to treating people with dignity and respect'. [Human Rights Policy (web), 05/2022: generalmills.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Human Rights Policy states that 'The company endorses the principles enshrined in: The United Nations Guiding Principles on Business and Human Rights'. [Human Rights Policy (web), 05/2022: generalmills.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company state in its Human Rights Policy that 'We respect and acknowledge internationally recognized human rights principles.' The Human Rights Policy commits to each ILO core area: 'Consistent with the rights set forth in our Employee Code of Conduct and Supplier Code of Conduct, we: Prohibit forced labor, child labor, and discrimination. [...] Respect the principles of freedom of association and collective bargaining'. [Human Rights Policy (web), 05/2022: generalmills.com] <ul style="list-style-type: none"> Met: Company has a explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy commits to each ILO core area: 'Consistent with the rights set forth in our Employee Code of Conduct and Supplier Code of Conduct, we: Prohibit forced labor, child labor, and discrimination. [...]

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			<p>Respect the principles of freedom of association and collective bargaining'. [Human Rights Policy (web), 05/2022: generalmills.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The supplier code of conduct contains an explicit commitment to each ILO core area. See below [Supplier Code of Conduct, 2022: generalmills.com] • Met: Company explicitly list All four ILO for suppliers: The Suppliers Code of Conduct contains an explicit commitment to each ILO core area. With respect freedom of association and collective bargaining, the Company indicates: 'You will recognize and respect the rights of employees to freedom of association and collective bargaining'. [Supplier Code of Conduct, 2022: generalmills.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Human Rights Policy states that 'Are committed to creating a culture that ensures zero harm to our employees by establishing safe and healthy working conditions'. [Human Rights Policy (web), 05/2022: generalmills.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company states in its Human Rights Policy: 'Seek to compensate employees competitively and operate in compliance with applicable wage, work hours, overtime and benefits laws.' However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Policy (web), 05/2022: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The supplier code of conduct indicates: 'Ensuring health and safety is of utmost importance to General Mills. Suppliers shall meet or exceed all applicable health and safety laws, regulations, and industry standards in this area. Suppliers shall provide workers with a safe, clean, and healthy work environment'. It then discloses health and safety related minimum standards suppliers must uphold. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect to working hours, its Supplier Code indicates: 'Suppliers shall ensure that work schedules and overtime are consistent with all applicable laws and collective bargaining agreements, whichever affords the greater level of protection, including maximum hour and rest period laws. Workers shall receive annual leave and public holidays in accordance with local law'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, 2022: generalmills.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Met: Respecting the right to water: The Company states in its General water policy (website): 'Ensure that our direct operations do not encroach on the human right to water and sanitation in the communities in which we operate' [Water policy on website, N/A: generalmills.com] • Not Met: Company's policy commits to obtain FPIC: The Company indicates in its Human Rights Policy that it 'Recognize the importance of land rights as well as the principle of free, prior and informed consent (FPIC), as outlined in our Palm Oil Statement. Support implementation of FPIC by national authorities'. However, 'to recognize the importance' and 'to support the implementation by national authorities' are not considered formal statements of commitment according to CHRB wording criteria. The Statement on responsible palm oil sourcing indicates: 'we aim to source palm oil only from suppliers whose supply chains meet the following principles: [...] Respect for the right of all affected communities to give or withhold their free, prior and informed consent for plantation developments on land to which they hold legal, customary or user rights'. However, 'aim' is not considered a formal statement of commitment according to CHRB wording criteria.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Moreover, the Statement seems to have its scope limited to its palm oil sourcing. No evidence found of a publicly available policy statement committing it to respecting ownership/use of land and natural resources also includes a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing. [Human Rights Policy (web), 05/2022: generalmills.com] & [Palm Oil Sourcing Statement (web), 28/07/2022: generalmills.com]</p> <ul style="list-style-type: none"> • Not Met: Expecting suppliers to make these commitments <p>: Also in its Water Policy, it states: 'To mitigate and adapt to future water risk, we will address the following areas: [...] Engage suppliers as partners in responsible water stewardship.' However, no reference to requirements to respect the right to water or FPIC was found. [Water policy on website, N/A: generalmills.com]</p>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights: The company indicates: 'We have also embraced the United Nations Women's Empowerment Principles'. The Company is signatory [Human Rights Policy (web), 05/2022: generalmills.com] • Not Met: Expects suppliers to respect at least one of these rights: The Suppliers Code of Conduct indicates: 'General Mills believes the protection of human rights throughout our supply chain is a critical part of our mission and is committed to respecting all human rights across our full value chain. This protection applies to all individuals, inclusive of migrant workers, women, and children'. However, although the Company indicates that it believes that the protection of individuals, including migrant workers, women, and children, is a critical part of its mission, no evidence found indicating it expects suppliers to commit to respect women's rights or children's rights or migrant workers' rights. [Supplier Code of Conduct, 2022: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The company indicates: 'We have also embraced the United Nations Women's Empowerment Principles'. The Company is signatory [Human Rights Policy (web), 05/2022: generalmills.com] • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: The Company states in its human rights policy that 'as part of our commitment to respect human rights, we have established internal and external mechanisms to help identify, address and mitigate potential adverse human rights impacts that may be caused by our actions'. The Company indicates, in its Palm Oli Policy: 'As part of our commitment, General Mills has integrated responsible palm oil procurement guidelines into our sourcing strategies. As a principled purchaser, General Mills engages its suppliers in direct review of their palm oil production and sourcing practices, supported by our partnership with Proforest – and will continue to do so. If an audit or other highly credible source reveals or confirms that a supplier is seriously violating the stated principles, and if that supplier does not acknowledge and immediately move to acceptably remediate the concern, General Mills will move to suspend or eliminate palm oil purchases from the supplier in question'. However, no evidence found of a publicly available statement committing to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to in a suitable source for policy statements. The Company discloses updated reports on progress in both Ivory Coast and Ghana. [Human Rights Policy (web), 05/2022: generalmills.com] & [Palm Oil Policy, 03/2022: generalmills.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives: The Company is collaborating with the Cocoa & Forest initiative to improve performance and working conditions in the Cocoa Supply chain in Ghana and Ivory Coast. However, no commitment to collaborating with judicial or non-judicial mechanisms to provide access to remedy in a suitable source for policy statements was found. [Cocoa & Forests Initiative action plan, 2021: file:///Users/gabriela/Downloads/General%20Mills%20Cocoa%20Forests%20Initiative%20Action%20Plan%20Narrative%20Sept%202021.pdf] • Not Met: Work with suppliers to remedy impact: In the context of the Cocoa & Forest Initiative, the Company indicates that it is 'working closely with our major suppliers to transition our global cocoa volumes to sustainable sourcing programs with a focus on improving smallholder farmer livelihoods sustainable production and ingredient quality'. Action plan is focused on 'forest protection and restoration;

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			sustainable production and farmers' livelihoods, and community engagement and social inclusion'. In relation to productions and livelihoods, via suppliers and delivery partners, the company states that 'we will continue to invest in the long-term productivity of cocoa/farms in our supply base through, among other things, the provision of Good Agricultural Practices training to farmers, the distribution of shade trees and the implementation of agroforestry practices'. The Company discloses updated reports on progress in both Ivory Coast and Ghana. However, no commitment to work with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services in a suitable source for policy statements was found. The Palm Oli Policy indicates: 'We are committed to sourcing palm oil in a socially and environmentally responsible manner and to working with suppliers to help them achieve that. We are acting to ensure that our supply chain remains aligned with our sustainable sourcing commitments'. However, this commitment is found in its Palm Oil Policy and it is not clear the Company has a general commitment to work with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services. [Cocoa & Forests Initiative action plan, 2021: file:///Users/gabriela/Downloads/General%20Mills%20Cocoa%20Forests%20Initiative%20Action%20Plan%20Narrative%20Sept%202021.pdf] & [Palm Oil Policy, 03/2022: generalmills.com]
A.1.5	Commitment to respect the rights of human rights defenders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates that 'no reprisal or retaliatory action will be taken against anyone for raising legitimate concerns. We are committed to investigating and responding to such concerns in a prompt and responsible manner'. However, there must be a commitment concerning human rights defenders specifically, or against anyone who opposes the Company due to human rights. No evidence found. [Human Rights Policy (web), 05/2022: generalmills.com] • Met: Company expect suppliers to make this commitment: The Suppliers Code of Conduct indicates: 'Suppliers shall prohibit unlawful retaliation, including, but not limited to, threats, intimidation, and attacks, against individuals who report a compliance or ethical issue learned during the course of work performed for General Mills, who cooperate in good faith with the investigation of a complaint, or who defend environmental or human rights'. [Supplier Code of Conduct, 2022: generalmills.com] Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Human Rights Policy states that 'At General Mills, we have resources appointed to enhance our human rights strategy. The Global Impact Governance Committee (GIGC) led by our Chairman and CEO and overseen by the Board's Public Responsibility committee, is accountable for our sustainability programs'. The CEO is a Board member. Sustainability includes human rights. [Human Rights Policy (web), 05/2022: generalmills.com] • Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board/Committee review HRs strategy: The Human Rights Policy states that 'The Global Impact Governance Committee (GIGC) led by our Chairman and CEO and overseen by the Board's Public Responsibility committee, is accountable for our sustainability programs. The Chairman and CEO convenes the GIGC at least three times a year to establish, direct and oversee General Mills' positions on matters of significance to the company and its stakeholders concerning corporate social responsibility, environmental and sustainability issues, including human rights. The GIGC annually reviews the company's efforts to address risks of forced labor in our supply chain, approving a statement which is signed by the CEO and shared publicly on our website. The Committee also reviews numerous third-party surveys, reports and rankings on the Company's corporate responsibility performance'. [Human Rights Policy (web), 05/2022: generalmills.com] • Not Met: Examples/trends re HR discussion in the last reporting period: The Human Rights Policy states: 'The GIGC annually reviews the company's efforts to

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			<p>address risks of forced labor in our supply chain, approving a statement which is signed by the CEO and shared publicly on our website'. The latest Slavery and human trafficking statement was signed by the CEO. The Policy also notes: 'The Chairman and CEO convenes the GIGC [Global Impact Governance Committee] at least three times a year to establish, direct and oversee General Mills' positions on matters of significance to the company and its stakeholders concerning corporate social responsibility, environmental and sustainability issues, including human rights. The GIGC annually reviews the company's efforts to address risks of forced labor in our supply chain, approving a statement which is signed by the CEO and shared publicly on our website. The Committee also reviews numerous third-party surveys, reports and rankings on the Company's corporate responsibility performance'. However, no evidence found of specific topics discussed in last reporting year (although the policy statement indicates its duties, this looks for specific work effectively carried out last reporting year). No further evidence found in latest report. [Human Rights Policy (web), 05/2022: generalmills.com] & [2021 MSA, 09/2021: generalmills.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member: The 2022 Global Responsibility Report explains: 'The Global Impact Governance Committee (GIGC), led by our Chairman and CEO and overseen by the Board's Public Responsibility committee, is accountable for our sustainability program. The Chairman and CEO convenes the GIGC at least three times each year to establish, direct and oversee General Mills' positions on matters of significance to the company and its stakeholders concerning corporate social responsibility, environmental and sustainability issues, and philanthropy. These matters are included in our Chairman and CEO's annual performance objectives and impact his compensation'. The CEO is a Board member. However, it is not clear if the compensation is linked to its human rights policy commitment. No further explanation of it found. [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy: The 2022 Global Responsibility Report explains: 'The Global Impact Governance Committee (GIGC), led by our Chairman and CEO and overseen by the Board's Public Responsibility committee, is accountable for our sustainability program. The Chairman and CEO convenes the GIGC at least three times each year to establish, direct and oversee General Mills' positions on matters of significance to the company and its stakeholders concerning corporate social responsibility, environmental and sustainability issues, and philanthropy'. However, although the Company indicates that it meets to discuss its Human Rights approach, among other topics, it is not clear the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee. [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided: The 2022 Global Responsibility Report notes: 'The GIGC, which was formalized in 2021, is an evolution from the previous Sustainability Governance Committee and reflects the continued integration of sustainability into the company and the understanding that our ambitious targets will require alignment, operationalization and investment across the company'. The GIGC oversees the Company's Human Rights approach. However, it is not clear there is a structural change in the Company's business model or strategy, as the evidence seems to refer to an executive level committee being restructured. [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com]

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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Human Rights Policy states: 'Operational accountability rests with the head of Strategy and Growth, supported by members of the Global Executive Team, including the Chief Executive Officer as well as the heads of Global Legal and Human Resources'. [Human Rights Policy (web), 05/2022: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: In relation to 'labor practices' governance, the 2019 Responsibility report states that 'at an operational level, the Human Resources organization leads key employee initiatives in partnership with company business leaders at multiple levels. Reflecting the importance of people to our business, General Mills employs a Director of Diversity and Inclusion; a Director of Global Health Services; and a Vice President of Engineering, Global Safety and Environment'. The 2021 Global Responsibility also indicates: 'The company's Chief Sustainability and Global Impact Officer stewards the company's sustainability work, reporting to the Chief Strategy and Growth Officer, and working closely with other key business leaders to develop, coordinate and execute programs to achieve company-wide targets'. [Global Responsibility 2019, 2019: generalmills.com] & [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights: The 2022 Global Responsibility Report explains: 'The Global Impact Governance Committee (GIGC), led by our Chairman and CEO and overseen by the Board's Public Responsibility committee, is accountable for our sustainability program. The Chairman and CEO convenes the GIGC at least three times each year to establish, direct and oversee General Mills' positions on matters of significance to the company and its stakeholders concerning corporate social responsibility, environmental and sustainability issues, and philanthropy. These matters are included in our Chairman and CEO's annual performance objectives and impact his compensation'. However, it is not clear if the compensation is linked to its human rights policy commitment. No further explanation of it found. [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system: The Company indicates in its Annual Report 2021: 'While the board and its committees oversee key risk areas, company management is charged with the day-to-day management of risk. The company has robust internal processes and an effective internal control environment that facilitate the identification and management of risks and regular communication with the board. These processes include a robust enterprise risk management (ERM) program that is designed to identify and assess risks that may have a significant impact on our business, regular internal risk management meetings, a risk committee of senior management with ownership for strategic risks, operating risk owners with accountability for risk management activities, codes of conduct, a strong legal department and ethics and compliance office and a comprehensive internal and external audit process. The audit committee has primary responsibility for reviewing and monitoring the company's ERM program, which is designed to identify, manage and mitigate critical risks. Management provides ERM updates to the audit committee throughout the year to assist the committee in ensuring that the company has a robust ERM program that is operating effectively.' However, no further evidence describing how human rights risks are integrated as part of the ERM was found. The 2022 Global Responsibility Report indicates: 'Responsible sourcing is integrated into our Source to Pay process, the workflow utilized by the Global Sourcing organization. In fiscal 2021,

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			<p>we further advanced our program in the following ways: [...] Piloted a new Risk Escalation and Resolution process that incorporates Global Responsible Sourcing program critical findings and also investigates human rights concerns outside of audit data [...]. Began requiring buyer risk resolution plans to be submitted and approved by the sourcing leadership team as part of the escalation process'. However, it is not clear that this Source to Pay process is integrated in its company-wide enterprise risk management. No further evidence found. [Annual Report 2021, 2021: s22.q4cdn.com] & [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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"> • Met: Score of 1 on A.1.2.a: See A.1.2.a • Not Met: Communicates its policy to all workers in own operations: The human rights policy states that 'training is an important part of effective human rights practices. We therefore undertake efforts to build awareness about our human rights policies and procedures'. No details found, however, on whether all employees receives human rights training (proxy for communication). In addition, in its Responsibility Report 2021, it indicates: 'Our comprehensive Code of Conduct and Ethics & Compliance program promote ethical behavior in all aspects of our employees' work. In support of our Code of Conduct, the company has 24 corporate-level policies that outline more detailed compliance expectations. They cover topics such as food safety, workplace safety, appropriate advertising, business conduct standards, anti-corruption and ethical sourcing. Annually, more than 10,000 company leaders – from managers upward – must attest to compliance with our Code of Conduct and business conduct policies. Employees receive additional training on these policies, and our Ethics Line'. It is not clear, however, whether all employees receive communications on the Company's human rights policy commitments. [Global Responsibility Report 2021, 2021: generalmills.com] & [Code of conduct - web: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Steps to communicate policy commitments to supply chain: The Company indicates in its Responsibility Report 2021: 'The Supplier Code of Conduct is integrated into standard ingredient and packaging contracts (in addition to being linked to all purchase orders)'. The Code states: 'This Supplier Code [...] describes the requirements and ways of working that General Mills applies together with its upstream supply chain third parties'. Also: 'Suppliers shall continuously exercise due diligence to reasonably verify conformance with this Code of Conduct within their entire supply chain. Suppliers shall develop policies and management systems to identify risks and mitigation measures to correct deviations from this Code of Conduct among their own suppliers'. [Supplier Code of Conduct, 2022: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company indicates in its Responsibility Report 2021: 'The Supplier Code of Conduct is integrated into standard ingredient and packaging contracts (in addition to being linked to all purchase orders).' [Global Responsibility Report 2021, 2021: generalmills.com] • Met: Company requires suppliers to cascade down to their suppliers: The Suppliers Code of Conduct indicates: 'This Code of Conduct applies to General Mills' suppliers and their subsidiaries, affiliates, and subcontractors (each a "supplier") providing goods or services to General Mills, or for use in or with General Mills products. Suppliers shall continuously exercise due diligence to reasonably verify conformance with this Code of Conduct within their entire supply chain. Suppliers shall develop policies and management systems to identify risks and mitigation measures to correct deviations from this Code of Conduct among their own suppliers'. [Supplier Code of Conduct, 2022: generalmills.com]
B.1.5	Training on Human Rights	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: How workers are trained on HR policy commitments: The human rights policy states that 'training is an important part of effective human rights practices.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>We therefore undertake efforts to build awareness about our human rights policies and procedures'. In addition, in its Responsibility Report 2021, it indicates: 'Our comprehensive Code of Conduct and Ethics & Compliance program promote ethical behavior in all aspects of our employees' work. In support of our Code of Conduct, the company has 24 corporate-level policies that outline more detailed compliance expectations. They cover topics such as food safety, workplace safety, appropriate advertising, business conduct standards, anti-corruption and ethical sourcing. Annually, more than 10,000 company leaders – from managers upward – must attest to compliance with our Code of Conduct and business conduct policies. Employees receive additional training on these policies, and our Ethics Line'. No description found, however, on how workers are trained in company's human rights policy commitments. The Company has provided additional evidence to this indicator, however, it was related to training to its Sourcing and Sustainability teams. [Global Responsibility Report 2021, 2021: generalmills.com] & [Human Rights Policy (web), 05/2022: generalmills.com]</p> <ul style="list-style-type: none"> • Met: Trains relevant managers including procurement: The Company indicates in its Responsibility Report 2019: 'to ensure alignment across the function, all sourcing employees complete online learning on our supplier code of conduct'. In 2018, we also trained more than 190 supply chain employees on our responsible sourcing, supplier diversity and sustainable sourcing programs as part of formal on boarding for all new Global Sourcing employees'. In addition, in its slavery and human trafficking statement 2021: 'To ensure alignment across the function, all sourcing employees complete online learning on our Supplier Code of Conduct. This training covers the four pillars of our Responsible Sourcing program: human rights, environment, health and safety, and business integrity. The human rights section of the training includes education on modern slavery, forced labor, and child labor, as well as descriptions of other human rights'. The 2021 Global Responsibility Report also indicates: 'To provide education and a forum for peer sharing on responsible sourcing and supplier diversity topics, we hold Corporate Social Responsibility Communities of Practice on a quarterly basis for the Sourcing and Sustainability teams. These events are designed to increase consideration in daily decision making about issues that impact people and to promote networking between the two teams. The Communities of Practice take place globally, with 80 to 100 people participating in each session. For example, in June 2020, to build on the company's Pride month events, we held a global call on the LGBTQ+ community fight for human rights and equity. Participants learned about the start of this human rights movement in the U.S. and discussed how we all might advance understanding within General Mills'. [2021 MSA, 09/2021: generalmills.com] & [Global Responsibility Report 2021, 2021: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Met: Trains suppliers to meet company's HR commitment: The Company indicates that In 2018, we also trained more than 190 supply chain employees on our responsible sourcing, supplier diversity and sustainable sourcing programs as part of formal on boarding for all new Global Sourcing employees'. [2021 MSA, 09/2021: generalmills.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates in its Responsibility Report 2019: 'we address human rights through a multifaceted approach, including supplier assessments, audits and direct engagement. Our Supplier Code of Conduct is the backbone of our program. (...) Since 2009, third-party firms have conducted independent audits of our owned locations and co-packers, which cover human rights, health and safety, the environment and business integrity. (...) In fiscal 2018, we transitioned co-packers to the Sedex Members Ethical Trade Audit (SMETA) protocol. This framework is widely recognized by companies in the food sector, which enables suppliers to share audit results with customers and improve efficiency. Another benefit is that remediation of identified non-compliances will be managed and independently verified by a third-party. By fiscal 2020, our co-packers will follow the same overall audit process as our Tier 1 suppliers'. In addition, in its Responsibility Report 2021: 'Tier 1 direct materials suppliers are rated by inherent country and goods risk using external data sources. From fiscal 2018 to fiscal 2020, inherently high-risk suppliers were asked to complete a self-assessment questionnaire; audits were then conducted for the highest-risk suppliers that

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>completed this assessment. During fiscal 2020, one supplier facility underwent a third-party audit'. [Global Responsibility 2019, 2019: generalmills.com]</p> <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored: The Company indicates in its Responsibility Report 2021: 'During fiscal 2020, 45 of our owned locations and co-packers were audited, representing about 21% of the total, compared to 54 locations the prior year'. However, no evidence found on the specific percentage of the supply chain monitored. [Global Responsibility Report 2021, 2021: generalmills.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2.a • Met: Describes corrective action process: During the audit process, 'we require corrective plans and resolution for any identified non-compliances'. The Company indicates that 'when significant issues arise in audits, a Critical Finding Alert email is issued to key General Mills team members, including regional leadership, division counsel and subject matter experts. This group gathers to review the relationship with the facility, discuss the findings and determine next steps. A regular check-in meeting occurs to review progress the facility has made until the issue is resolved'. The Company discloses the number of non-compliances for owned locations, 9; co-packers, 13; tier 1 suppliers, 2. Non-compliances included safety and hygienic conditions, harsh or inhumane treatment, working hours, regular employment and wages and benefits. [2020 Global Responsibility Report, 2020: globalresponsibility.generalmills.com] • Not Met: Disclose findings and number of corrective action: The Company discloses information about the number of locations with non-compliances found in its Responsibility Report 2021 for the last three years (2020: 1, 2019:6, 2018:24). However, no further information describing corrective actions taken was found. [Global Responsibility Report 2021, 2021: generalmills.com]
B.1.7	Engaging and terminating 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"> • Met: HR affects selection of suppliers: The company indicates that 'we are integrating supplier responsibility into our global sourcing standards and processes. As of fiscal 2019, all General Mills buyers: Include a standardized supplier responsibility review in their category strategies; Evaluate the risk of prospective suppliers, using due diligence guidance; Include language in contracts related to social and environmental performance, if appropriate; Meet with strategic suppliers twice a year to discuss progress and provide feedback using a performance scorecard, which includes responsible sourcing'. In addition, Since 2009, third-party firms have conducted independent audits of our owned locations and co-packers, which cover human rights, health and safety, the environment and business integrity. (These are separate from food safety audits.) In fiscal 2018, we transitioned co-packers to the Sedex Members Ethical Trade Audit (SMETA) protocol. [2020 Global Responsibility Report, 2020: globalresponsibility.generalmills.com] • Met: HR affects on-going supplier relationships: The Suppliers Code of Conduct indicates: 'General Mills will assess its suppliers' compliance with this Code of Conduct and demonstrate that it is working with its suppliers to continuously improve their performance. Violations of this Code of Conduct may jeopardize the supplier's business relationship with General Mills, up to, and including termination'. The Suppliers Code of Conduct contains the Company's provisions on Human Rights. In addition, the Company indicates on its Palm Oil responsible sourcing statement website: 'As a brand owner and manufacturer which is often many times removed from the producer, we expect our direct suppliers to robustly manage their own supply chains to ensure palm volumes supplied to General Mills meet or exceed our standards. In cases where there is verified non-compliance with our policy, or where there is continued failure to remediate verified non-compliances in a timely manner, we take steps to remove those producers from our supply chain.' [Palm Oil (web), N/A: generalmills.com] & [Supplier Code of Conduct, 2022: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights: The Company indicates in its Slavery and human trafficking Statement 2021 that 'Since fiscal 2015, all of our palm oil has been sourced through purchases meeting Roundtable on Sustainable Palm Oil (RSPO) standards. It indicates, in its Sustainability Report 2019, that 'we are driving toward increased public transparency regarding upstream supply and now expect all of our palm oil suppliers to follow a similar practice'. However, although the Company is working towards supplying from sustainable sources, it is not clear whether it establishes

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>specific positive incentives based on criteria that includes human rights performance on a general basis. No further evidence found in latest report. [Global Responsibility 2019, 2019: generalmills.com] & [2021 MSA, 09/2021: generalmills.com]</p> <ul style="list-style-type: none"> • Met: Working with suppliers to meet HR requirements: As part of its Sustainable sourcing commitment, the Company describes how it works with suppliers to improve performance in environmental and social areas. In coca supply chain, it indicates that ‘we work directly with our suppliers to address systemic challenges and enforce our Supplier Code of Conduct’. Challenges include economic viability and child labour – ‘helping families keep children in school’. Work carried out includes women’s empowerment (training people on gender issues in Ghana and Ivory Coast) and children’s education (financing resources for schooling). It also indicates that it works in ‘farmer incomes’. It also reports supporting palm oil suppliers to increase traceability of its supply chain. [Global Responsibility 2019, 2019: generalmills.com]
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The 2022 Global Responsibility Report publishes its different stakeholders, including communities, NGOs, employees and suppliers. It also discloses the list of topics of interest for each group. Human rights is a topic of interest of NGOs and suppliers. It indicates: ‘At General Mills, we engage with stakeholders to accelerate progress on social and environmental initiatives. Our approach includes open dialogue, collaboration and transparent disclosure’. Regarding its due diligence process, it indicates that ‘We engage with key strategic partners to help us enable social and environmental progress in these value chains’. It also notes that ‘in May 2021 General Mills hosted our first-ever ESG investor event, held virtually’. The Company also notes it has provided, since 2019, ‘philanthropic support to PUR Project to drive long-term forest protection and restoration by improving cocoa farmer livelihoods. Through work with smallholder farmers, PUR Project has identified the urgent need to restore forest cover and strengthen economic resilience in key General Mills cocoa sourcing regions in West Africa, including Mont Peko buffer communities in Cote d’Ivoire and Kakum National Park in Ghana’. However, it is not clear the process by which identified affected stakeholders with whom to engage (in relation to their human rights) in last two years. [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates in its Slavery and human trafficking Statement 2021: 'General Mills partnered with Shift [...] to assess our salient human rights risks. We conducted an initial assessment of human rights-related issues inherent to a complex supply chain like General Mills to identify and prioritize future due diligence on the most salient human rights risks to people throughout our value chain. The Shift assessment began in fiscal 2020 and was completed in fiscal 2021. This initial assessment [...] included: Desktop research including a review of all relevant internal policies and programs underway; Internal stakeholder interviews with individuals from across the company; External stakeholder interviews of leaders from non-profit organizations; Workshops with internal stakeholders to review research findings and prioritize the list of salient issues; Peer benchmarking'. In addition, in its Responsibility Report 2021, it indicates: 'To advance our enterprise-wide approach to human rights, we partnered with Shift, the leading center of expertise on the UNGPs, in 2020 to assess General Mills’ current approach to respecting human rights. Shift assessed our practices across our business operations and supply chain'. [2021 MSA, 09/2021: generalmills.com] & [Global Responsibility Report 2021, 2021: generalmills.com] • Met: Identifying risks through relevant business relationships: See above [2021 MSA, 09/2021: generalmills.com] & [Global Responsibility Report 2021, 2021: generalmills.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, the Company consulted with Shift and engaged with several stakeholders. However, it is not clear that it engaged with affected stakeholders (suppliers' workers, communities), as evidence found refer to 'leaders from non-profit organizations'. Previous assessment took into account earlier evidence where the Company engaged with suppliers, however an engagement with affected stakeholders (for instance, suppliers' workers) is needed to meet this indicator. The Company partnered with Shift to conduct the due diligence process. In its feedback to CHRB, the Company makes reference to its 2022 Global Responsibility, where it discloses its stakeholder engagement, including its stakeholder groups and topics of interest for each group. It also indicates: 'Our approach [to stakeholder engagement] includes open dialogue, collaboration and transparent disclosure'. The Company also referred to a project in which it is 'partnering to support sustainable production and smallholder farmers'. It notes: 'General Mills is collaborating with Muslim Mas Group to invest in a smallholder palm farmer engagement program in Aceh Singkil, Sumatra, Indonesia, neighboring the Leuser ecosystem'. Finally, the Company provided information on its 'philanthropic support to PUR Project to drive long-term forest protection and restoration by improving cocoa farmer livelihoods. Through work with smallholder farmers, PUR Project has identified the urgent need to restore forest cover and strengthen economic resilience in key General Mills cocoa sourcing regions in West Africa, including Mont Peko buffer communities in Cote d'Ivoire and Kakum National Park in Ghana'. However, although the Company has provided various examples of engagement with different stakeholders, including with small holder farmers, the indicators looks for evidence of engagement with affected stakeholders as part of risk identification. Current evidence seems to refer to actions taken in relation to specific issues rather than engagement that allowed learning about impacts. [2021 MSA, 09/2021: generalmills.com] & [Global Responsibility Report 2021, 2021: generalmills.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: The 2019 Global responsibility report states that 'we worked with Bureau Veritas to expand and elevate our responsible sourcing program in our first-tier supplier base'. In its public disclosure to CHRB, the Company adds that 'Risk factors considered by Bureau Veritas included geography, category, results of prior audits on numerous factors, including human rights and child labor. The data sources used by Bureau Veritas include 3,655 SMETA audits describing 35,409 issues, 12,763 ISO14001 audits describing 30,564 non-conformities, 1,324 SA800 audits describing 3,516 non-conformities. Overall, 17,622 audits distributed globally with a heavy concentration in countries with known ESG risks based on public sources including the Yale Performance Index, the Social Progress Global Index, the Worldwide Governance Index and the Corruption Perception Index. Based on an aggregation of all these data accounting for density, our segmentation was determined. These data sources were chosen to uncover risks as outlined in our Supplier Code of Conduct and focus heavily on Human Rights and Health and Safety'. In addition, in its Slavery and human trafficking Statement 2021: 'General Mills partnered with Shift [...] to assess our salient human rights risks. We conducted an initial assessment of human rights-related issues inherent to a complex supply chain like General Mills to identify and prioritize future due diligence on the most salient human rights risks to people throughout our value chain. The Shift assessment began in fiscal 2020 and was completed in fiscal 2021. This initial assessment [...] included: Desktop research including a review of all relevant internal policies and programs underway; Internal stakeholder interviews with individuals from across the company; External stakeholder interviews of leaders from non-profit organizations; Workshops with internal stakeholders to review research findings and prioritize the list of salient issues; Peer benchmarking'. However, this latest piece of evidence doesn't include description o how factors such as social, geographical or other were taken into account. [2020 CHRB Supplemental Disclosure, 18/06/2020: business-humanrights.org] & [Global Responsibility 2019, 2019: generalmills.com] • Met: How process applies to supply chain: See above [2020 CHRB Supplemental Disclosure, 18/06/2020: business-humanrights.org] & [Global Responsibility 2019, 2019: generalmills.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Public disclosure of the results of HR assessment: The Company indicates in its Slavery and human trafficking statement 2021: 'This assessment identified forced labor and child labor as the most salient issues associated with our value chain. Shift also identified wages, earnings, and working hours; freedom of association and collective bargaining; and land rights as important salient issues'. [2021 MSA, 09/2021: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain: The Company indicates different actions taken both within its supply chains and beyond them. However, the indicator focuses on the description of its global system to prevent, mitigate or remediate its salient human rights issues in its supply chain (or how it shows actions taken for all salient issues). [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Example of actions decided on at least 1 salient HR issues: The Slavery and human trafficking statement 2021: 'General Mills and CARE International launched the Cocoa Sustainability Initiative (CSI) in 2014 to improve smallholder cocoa farmers' livelihoods and well-being in Ghana and Cote d'Ivoire. The program addresses low agricultural incomes and productivity through Good Agricultural Practices (GAP) Training, improved access to inputs, and strengthening of agricultural cooperatives. Activities including Village Savings and Loans Associations (VSLAs), Women's Groups, and Community Development Committees aim to increase agency, resiliency, and self-efficacy of communities and individual beneficiaries. Program activities include initiatives that create community awareness around child labor for mitigation and prevention, through educating parents about the risks of child labor, the importance of children under 15 returning to school, and the provision of birth certificates. General Mills also partners with PUR Project to support smallholder cocoa farmers with clean cook stoves for improved health, income diversification and stronger livelihoods, and ecological resilience through agroforestry programs in Ghana and Cote d'Ivoire.' Child labour and wages are two of the Company's human rights issues. The Company has provided an additional source to this indicator, however key information was already in use. [2021 MSA, 09/2021: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: System for tracking or monitor if actions taken are effective: The Company indicates in its Slavery and human trafficking statement 2021: 'In fiscal 2020, we assessed the effectiveness of our existing approach to human rights by conducting an internal review and partnering with Shift to assess our strengths and opportunities. We then developed our updated strategy on human rights to address the identified challenges. Our cross-functional Human Rights Integration Team meets bi-weekly to discuss progress and challenges to implement our plans, in addition to external events, which might require additional actions. As we work to address human rights risks, we continue to partner with local NGOs and stakeholders to assess effectiveness'. [2021 MSA, 09/2021: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken: Although the Company indicates that it 'we continue to partner with local NGOs and stakeholders to assess effectiveness', no further details were found.
B.2.5	Communicating on human rights impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Provides two examples of comms with stakeholders: The Company discloses a Grievance list for palm oil related grievances. The list includes the issue at stake, who reported it, the relationship with the Company, actions taken and the status of each case. Although it does not describe how it specifically reaches each affected stakeholder during the process, the process followed is publicly disclosed and periodically updated. [Grievance List_ Palm Oil, 04/2022: generalmills.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Code of conduct, which applies to all, refers to a channel to report concerns, the ethics point, which is available online. The Ethics Line is hosted by an independent reporting service. It's available 24 hours a day, 7 days a week, from any location worldwide and is multi-lingual. [Code of Conduct, 2018: generalmills.com] & [Ethicspoint, N/A: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Channel is available in all appropriate languages and workers aware: As indicated in the code, the ethics line is multi-lingual. On its website, it provides 12 different languages to use the channel. In addition, the Company indicates in its Responsibility Report 2021: 'Annually, more than 10,000 company leaders – from managers upward – must attest to compliance with our Code of Conduct and business conduct policies. Employees receive additional training on these policies, and our Ethics Line – which is easily accessible on our intranet and external website – allows employees worldwide to ask questions or raise concerns confidentially and anonymously.' [Code of Conduct, 2018: generalmills.com] & [Global Responsibility Report 2021, 2021: generalmills.com] Met: Describe how workers in the supply chain have access to grievance mechanism: The Suppliers Code of Conduct indicates: 'Suppliers shall provide grievance mechanisms that are transparent, anonymous (where allowed by law), unbiased, responsive, confidential, and communicated to workers across their supply chain. To report a concern related to General Mills business, suppliers or their workers shall contact their General Mills representative or the General Mills Ethics Line'. [Supplier Code of Conduct, 2022: generalmills.com] Met: Expect Suppliers to convey expectation to their own suppliers: The Suppliers Code of Conduct indicates: 'Suppliers shall provide grievance mechanisms that are transparent, anonymous (where allowed by law), unbiased, responsive, confidential, and communicated to workers across their supply chain. To report a concern related to General Mills business, suppliers or their workers shall contact their General Mills representative or the General Mills Ethics Line'. It also notes: 'This Code of Conduct applies to General Mills' suppliers and their subsidiaries, affiliates, and subcontractors (each a "supplier") providing goods or services to General Mills, or for use in or with General Mills products. Suppliers shall continuously exercise due diligence to reasonably verify conformance with this Code of Conduct within their entire supply chain. Suppliers shall develop policies and management systems to identify risks and mitigation measures to correct deviations from this Code of Conduct among their own suppliers'. [Supplier Code of Conduct, 2022: generalmills.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Grievance mechanism for community: The Company indicates in its Slavery and human trafficking statement 2021: 'Our Ethics Line, hosted by an independent reporting service, is available 24 hours a day, 7 days a week, from any location worldwide and is multi-lingual. Those using the line can choose to remain anonymous. The Ethics Line is available on our Corporate Website and can be used by anyone wishing to raise a concern or question. [...] While the Ethics Line is open to all General Mills stakeholders to report concerns about any part of our value chain, it is primarily used for employees to report concerns of Employee Code of Conduct violations.' [2021 MSA, 09/2021: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Describes accessibility and local languages and stakeholder awareness: See above. The Ethics Point is available in 14 languages (including Chinese, Korean, Thai, among others). However, no information describing how it ensures affected stakeholders at its own operations are aware of the grievance mechanism. [Ethicspoint, N/A: secure.ethicspoint.com] Not Met: Communities access mechanism direct or through suppliers: The Suppliers Code of Conduct indicates: 'Suppliers shall provide grievance mechanisms that are transparent, anonymous (where allowed by law), unbiased, responsive, confidential, and communicated to workers across their supply chain. To report a concern related to General Mills business, suppliers or their workers shall contact their General Mills representative or the General Mills Ethics Line'. However, it is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>not clear that suppliers' external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the company's suppliers. [Supplier Code of Conduct, 2022: generalmills.com]</p> <ul style="list-style-type: none"> • Not Met: Expect supplier to convey expectation to their own suppliers: The Suppliers Code of Conduct indicates: 'Suppliers shall provide grievance mechanisms that are transparent, anonymous (where allowed by law), unbiased, responsive, confidential, and communicated to workers across their supply chain. To report a concern related to General Mills business, suppliers or their workers shall contact their General Mills representative or the General Mills Ethics Line'. It also notes: 'This Code of Conduct applies to General Mills' suppliers and their subsidiaries, affiliates, and subcontractors (each a "supplier") providing goods or services to General Mills, or for use in or with General Mills products. Suppliers shall continuously exercise due diligence to reasonably verify conformance with this Code of Conduct within their entire supply chain. Suppliers shall develop policies and management systems to identify risks and mitigation measures to correct deviations from this Code of Conduct among their own suppliers'. However, although suppliers have a grievance channel available to their workers and they must also verify conformance across their supply chain, it is not clear the mechanism is available to external individuals and communities at supply chain level. [Supplier Code of Conduct, 2022: generalmills.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism: The Company indicates in its Slavery and human trafficking statement 2021 when describing how it assesses the effectiveness of its Ethics Line: 'Each year, the company conducts an annual Ethical Culture Survey, which gathers employees' perceptions of our ethical culture and Ethics & Compliance resources. The Ethical Culture Survey goes to a randomly selected group representing 25% of employees worldwide. Our survey results indicate that employees feel comfortable raising concerns without fear of negative consequences, and they are confident that if they report an inappropriate business practice or ethical issue something will be done about it'. No details found, however, on whether there's any engagement in relation to improvement of the mechanism. [2021 MSA, 09/2021: generalmills.com] • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed: The Company indicates in its Code of Conduct: 'You will create a password. The system will generate a report key. Make a note of your password and report key – you will be the only person who knows this information. Use them to check on the status of your report.' Also, in its feedback to CHRB, the Company provides information on the different channels available, however, no description of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant found. [Code of Conduct, 2018: generalmills.com] & [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: There is a reference to an Anti-Retaliation Policy in its Code of Conduct, but it was not found in a publicly available source. In addition, it states in its Human Rights Policy: 'No reprisal or retaliatory action will be taken against anyone for raising legitimate concerns. We are committed to investigating and responding to such concerns in a prompt and responsible manner'. [Human Rights Policy (web), 05/2022: generalmills.com] & [Ethicspoint, N/A: secure.ethicspoint.com] • Met: Practical measures to prevent retaliation: The ethics line is handled by a third party. In addition, the anonymous reporting is possible both through the telephone and website reporting mechanisms. [Code of Conduct, 2018: generalmills.com] & [Ethicspoint, N/A: secure.ethicspoint.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: The Company indicates on its Ethics Line website that it 'will not retaliate against you – nor permit retaliation – for making a good faith report about a questionable business practice or behavior.' In addition, it states in its Human Rights Policy: 'No reprisal or retaliatory action will be taken against anyone for raising legitimate concerns. We are committed to investigating and responding to such concerns in a prompt and responsible manner'. However, no details in relation to commitment to not retaliate through the specific actions included in this requirement. [Code of Conduct, 2018: generalmills.com] & [Human Rights Policy (web), 05/2022: generalmills.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Suppliers Code of Conduct indicates: 'Suppliers shall prohibit unlawful retaliation, including, but not limited to, threats, intimidation, and attacks, against individuals who report a compliance or ethical issue learned during the course of work performed for General Mills, who cooperate in good faith with the investigation of a complaint, or who defend environmental or human rights. Suppliers shall create a mechanism for workers to submit their grievances anonymously and demonstrate that their complaints are reviewed and investigated'. However, as it is not clear the mechanism is open to the community at supplier level, it is not clear the prohibition of retaliation would also apply to them. [Supplier Code of Conduct, 2022: generalmills.com]
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"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) 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"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: In its feedback to CHRB, the Company provides its Palm Oil Grievance list. It also indicates its Palm Oil webpage where further information on palm oil grievance figures can be found. However, the evidence provided focuses on its palm oil supply chain. The indicator looks for general data about the practical operation of the mechanism, including the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers and for external individuals and communities that may be adversely impacted by the company. [Palm Oil (web), N/A: generalmills.com] & [Grievance List_ Palm Oil, 04/2022: generalmills.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company states in its Supplier Code that 'Suppliers shall provide compensation directly to employees that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards. Where there is no legislated minimum wage, suppliers shall provide wages that are comparable to relevant standard industry wages. Wages shall be paid promptly and in full. Wages shall not be subject to deductions as a disciplinary measure. Wage deductions shall not be used to keep workers tied to the employer or to their jobs'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: Improving living wage practices of suppliers: in its Slavery and human trafficking statement 2021, it reports: 'In addition to supplier programs, General Mills and CARE International launched the Cocoa Sustainability Initiative (CSI) in 2014 to improve smallholder cocoa farmers' livelihoods and well-being in Ghana and Cote d'Ivoire. The program addresses low agricultural incomes and productivity through Good Agricultural Practices (GAP) Training, improved access to inputs, and strengthening of agricultural cooperatives.' However, no reference to living wage was found. In addition, according its Triple Bottom Line document, General Mills has developed Triple Bottom Line Operating Unit, which is a group formed by some of the Company's brands. This Operating Unit developed a set of keystone KPIs, which includes Shared Economic Value for its supply chain: 'Percent of people in our supply chain making progress toward a living income'. The Company is working, through the Cocoa & Forests Initiative in action plans in Ghana and Ivory coast that, among other objectives, it includes 'sustainable livelihoods and income diversification for cocoa farmers will be accelerated through food crop diversification, agricultural inter-cropping, and development of mixed agro-forestry systems and shade-grown cocoa'. It discloses work carried out in both countries. In Ghana, the Company trained 11,6000 farmers in 'good agricultural practices' (GAPs), 'investment in the long-term productivity and quality of cocoa/farms in our supply base'. It trained 11,600 farmers in GAPs. It also helped rehabilitate 80ha of cocoa farms 'growing "more cocoa on less land" removes the need to expand cocoa farms and enhances farmer livelihoods and incomes'. Although no report found yet in diversification of products for farmers to promote sustainable livelihoods and income, this is part of the action plan to be achieved in 2022 (800 farms with diversified incomes). IN Cote d'Ivoire, the Company is implementing similar action plan. 5300 farmers have been trained in GAPs, 40 farmers participated in Village Savings and Loans Associations and around 1,300 farmers have applied crop diversification,[...]'. However, this document or its content has not been found in publicly available sources. [Triple Bottom Line 2019, 2019: 3blmedia.com] & [2021 MSA, 09/2021: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices): The Company indicates that 'We require facilities identified as having inherent risk to complete a multistep process including a technical review and documentation of policies and procedures. (...) To mitigate risk, we are enhancing our sourcing process to mandate compliance and decrease supplier time requirements'. However, it is not clear the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. No further evidence found in latest report. [2020 Global Responsibility Report, 2020: globalresponsibility.generalmills.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Global responsibility report 2019 states that in 2017 the Company conducted, in collaboration with Bureau Veritas, a 'high-level risk assessment and segmentation of 2,300 first-tier direct supplier facilities worldwide'. It also indicates that 'we also assessed suppliers that provide raw materials or ingredients covered by our sustainable sourcing goals, as well as natural and organic products. During fiscal 2018, we began inviting facilities globally to participate in our responsible sourcing program'. Moreover, the Company indicates that it started to map supply chain of sugarcane. Finally, the Company indicates, in its disclosure document, that 'we can generate Tier 1 maps for all direct and indirect material categories at the supplier, supplier facility level broken down by type of material purchased down to our lowest taxonomy'. A map is also provided. [Global Responsibility 2019, 2019: generalmills.com] & [2019 Engagement, 21/06/19: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company provides the names of global direct palm oil suppliers, and the lists of mills supplying its direct suppliers (name, country and coordinates) and also the Company has included in The CHRB General Mills Disclosure, date 6-21-2019, a map showing the breakdown of number of suppliers for one of our Sourcing platforms. However, no evidence found of the Company disclosing the mapping of the most significant parts of its supply chain (and defining how it defines that are the most significant). No further evidence found in latest report. [Palm Oil (web), N/A: generalmills.com] & [2019 Engagement, 21/06/19: business-humanrights.org] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (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"> • Not Met: Child Labour rules in codes or contracts: The Suppliers Code of Conduct indicates: 'Suppliers shall not employ children that are under 15 years of age, or 14 years of age where local law allows, or under the legal minimum age for employment in the country, whichever is greatest'. However, no evidence found in relation to guidelines on age verification and remediation programmes. No further information found. [Supplier Code of Conduct, 2022: generalmills.com] • Met: How working with suppliers on child labour: In its Slavery and human trafficking statement 2021, it reports: 'In addition to supplier programs, General Mills and CARE International launched the Cocoa Sustainability Initiative (CSI) in 2014 to improve smallholder cocoa farmers' livelihoods and well-being in Ghana and Cote d'Ivoire. The program addresses low agricultural incomes and productivity through Good Agricultural Practices (GAP) Training, improved access to inputs, and strengthening of agricultural cooperatives. [...] Program activities include initiatives that create community awareness around child labor for mitigation and prevention, through educating parents about the risks of child labor, the importance of children under 15 returning to school, and the provision of birth certificates'. [Global Responsibility Report 2021, 2021: generalmills.com] & [2021 MSA, 09/2021: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Suppliers Code of Conduct indicates: 'Suppliers shall not require payment of fees [...] .Workers shall not be required to pay recruitment fees or hiring-related fees to employers, agents, or labor brokers, unless allowed by local law'. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Suppliers to pay workers in full and on time in codes or contracts: The Suppliers Code of Conduct indicates: 'Suppliers shall provide compensation directly to employees that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards. Where there is no legislated minimum wage, suppliers shall provide wages that are comparable to relevant standard industry wages. Wages shall be paid promptly and in full. Wages shall not be subject to deductions as a disciplinary measure. Wage deductions shall not be used to keep workers tied to the employer or to their jobs'. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Suppliers Code of Conduct indicates: 'Suppliers shall not require payment of fees or the surrendering of identification as a condition of employment'. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: The Suppliers Code of Conduct indicates: 'Suppliers shall recognize and respect the rights of employees to freedom of association and collective bargaining. Suppliers shall ensure that representatives of trade unions are not subject to discrimination or harassment'. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Suppliers Code of Conduct indicates: 'Ensuring health and safety is of utmost importance to General Mills. Suppliers shall meet or exceed all applicable health and safety laws, regulations, and industry standards in this area. Suppliers shall provide workers with a safe, clean, and healthy work environment'. It sets minimum standards on health and safety that include: Product Safety and Quality, Safe Working Environment, investigation and Emergency Response and explains each of these provisions. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The 2022 Global Responsibility Report discloses figures on injury rate, however, it seems to be related to its own workers. [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] • Not Met: Fatalities rate for lasting reporting period: According to its 2022 Global Responsibility Report: 'Zero General Mills and contractor fatalities globally' in the fiscal year 2021. However, it is not clear that this figure also reflects its supply chain. [2022 Global Responsibility, 2022: globalresponsibility.generalmills.com] • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on land & owners in codes or contracts: The Suppliers Code of Conduct indicates: 'Suppliers must respect the land rights of women, indigenous peoples, and local communities impacted by their operations and sourcing practices. All negotiations regarding the property or land of indigenous peoples, including the use of and transfers of it, must adhere to the principles of free, prior, and informed consent, contract transparency and disclosure. Suppliers 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 General Mills'. However, it is not clear the Company has land requirements, including the requirements to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, with particular attention to vulnerable or marginalised tenure rights holders, and to negotiate with them to provide adequate compensation or requested alternatives to financial compensation in its supplier code of conduct. [Supplier Code of Conduct, 2022: generalmills.com] • Not Met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (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"> • Not Met: Rules on water stewardship in codes or contracts: Regarding suppliers, the Company's water policy states that it sets 'clear expectations that our suppliers provide a safe and healthy work environment including safe water for drinking and hygiene'. The Suppliers Code of Conduct indicates: 'Workers shall have unrestricted access to necessities such as clean drinking water and toilets during both work and non-work hours at the work site or in employer-provided or arranged housing'. However, no evidence found of specific guidelines including refraining from negatively affecting access to safe water, in its contractual arrangements with its suppliers or in its supplier code of conduct. [Water policy on website, N/A: generalmills.com] & [Supplier Code of Conduct, 2022: generalmills.com] • Met: How working with suppliers on water stewardship issues: The Company indicates that improving watershed health 'requires extensive collaboration to protect the water quality and supply that benefit growers, communities and the environment'. The Company's water stewardship plans cover both its operations and supply chain: 'water issues are local, so we take a risk-based approach to address specific challenges facing targeted geographies. We follow our four-phase approach to develop and implement watershed health strategies in eight priority watersheds'. 'We assessed 15 key ingredients in 36 sourcing regions and 66 facilities (including 17 supplier partners), covering 41 watersheds globally'. The four-phase approach includes establishing multi-stakeholder water stewardship plan to implement identified improvements'. [Global Responsibility 2019, 2019: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation: The Company indicates in its Responsibility Report 2021: 'Access to clean water is a fundamental human right, which we work to advance in the locations where our business has an impact. We have implemented the Alliance for Water Stewardship Standard, which takes into account the presence of water, sanitation and hygiene (WASH) practices in the local community, at our manufacturing locations in Albuquerque, New Mexico, and Sanhe (Beijing), China (in process). We are exploring this at other General Mills locations as well.' However, no further information about the number of affected by lack of access to water and sanitation was found. [Global Responsibility Report 2021, 2021: generalmills.com] • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (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"> • Not Met: Women's rights in codes or contracts: The Suppliers Code of Conduct indicates: 'General Mills believes the protection of human rights throughout our supply chain is a critical part of our mission and is committed to respecting all human rights across our full value chain. This protection applies to all individuals, inclusive of migrant workers, women, and children'. However, no further requirements found, including providing equal pay for equal work, introduce measures to ensure equal opportunities and to eliminate health and safety concerns that are particularly prevalent among women workers in its contractual arrangements with suppliers or supplier code of conduct. [Supplier Code of Conduct, 2022: generalmills.com] • Met: How working with suppliers on women's rights: The Company provides different examples on its work on women's empowerment. It has a supplier diversity team embedded in global sourcing to build partnerships across the Company to match diverse suppliers with business needs and opportunities. It also provides training to sourcing buyers in North America to incorporate diversity into strategic plans (spending in diverse suppliers including women, veteran, LGBTQ and others). In addition, in the Cocoa supply chain the Company reports that in Ivory Coast it focused in women's empowerment, educating in gender issues. In the context of supplier diversity, the Company states that it participates in the Women's Business Enterprise National Council and the Women's Business Development Center. 'Through these organizations and other industry groups, we benchmark, share best practices and network with prospective diverse suppliers'. [Global Responsibility 2019, 2019: generalmills.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 24.26 out of 80 points scored in themes A-D has been applied to produce a score of 6.06 out of 20 points for theme E.

Disclaimer

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

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

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

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