

Company Name Kellogg's
Industry Agricultural Products (Supply Chain only)
Overall Score 33.6 out of 100

Theme Score	Out of	For Theme
5.3	10	A. Governance and Policies
10.1	25	B. Embedding Respect and Human Rights Due Diligence
6.0	20	C. Remedies and Grievance Mechanisms
5.4	25	D. Performance: Company Human Rights Practices
6.7	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: Universal Declaration of Human rights (UDHR): The Human rights policy states: We are committed to upholding the rights enshrined in the International Bill of Rights (including the Universal Declaration of Human Rights)'. [Human Rights Policy, 2022: crreport.kelloggcompany.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: Also in its Human Rights Policy, the Company states: 'Kellogg Co.'s Human Rights Policy is drafted in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.' [Human Rights Policy, 2022: crreport.kelloggcompany.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: In its Human Rights Policy, the Company states: 'We are committed to upholding the rights enshrined in the International Bill of Rights (including the Universal Declaration of Human Rights) and the eight International Labour Organization (ILO) fundamental conventions as set out in the "Declaration of Fundamental Principles and Rights at Work'. [Human Rights Policy, 2022: crreport.kelloggcompany.com] Met: Company has an explicit commitment to All four ILO Core: In its Human Rights Policy, the Company states: 'We are committed to upholding [...] the eight International Labour Organization (ILO) fundamental conventions as set out in the "Declaration of Fundamental Principles and Rights at Work." This includes our commitment to the four core conventions, Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 & No.

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			<p>98); The elimination of all forms of forced and compulsory labour (Convention No. 29 & No. 105); The effective abolition of child labour (Convention No. 138 & No. 182); The elimination of discrimination in respect of employment and occupation (Convention No. 100 & No. 111)'. [Human Rights Policy, 2022: crreport.kelloggcompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The Company indicates in its Supplier Code of Conduct: 'Suppliers must comply with all applicable laws and regulations, including treaties and international standards such as [...] and the eight International Labour Organization (ILO) fundamental conventions as set out in the Declaration on Fundamental Principles and Rights at Work. [Supplier Code of Conduct, 2022: kelloggcompany.com] • Met: Company explicitly list All four ILO for suppliers: The Global supplier code of conduct includes commitments to child labour, forced labour and discrimination. In relation to freedom of association and collective bargaining, it states the following: 'Suppliers must respect the rights of their Employees to freely associate, organize, and bargain collectively, where allowed by law. Employees, or their representatives, shall be allowed to openly communicate with management regarding working conditions or management practices without fear of discrimination, reprisal, retaliation, intimidation, or harassment. Where rights to freedom of association and collective bargaining are restricted under law, Suppliers shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining. This may include the facilitation of free choice by workers to elect their own workplace representatives'. [Supplier Code of Conduct, 2022: kelloggcompany.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: In its Code of Ethics the Company states: 'We are committed to maintaining a safe and healthy workplace. Our colleagues, business partners, visitors and communities deserve no less.' [Global Code of Ethics, 09/2019: kelloggcompany.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: In its Human Rights Policy, the Company states: 'Throughout our own operations and our supply chain we require compliance with all applicable laws and regulations, or collective bargaining agreements, regarding maximum working hours, overtime vacation time, leave periods, maternity/paternity leave, and public holidays. All overtime hours are to be voluntary and compensated at a premium rate. Working hours are not to be excessive, such that the health or safety of the Employee are negatively impacted. Appropriate rest time, mealtime, and days off are to be provided to ensure a safe working environment and in accordance with all local laws or collective agreements'. 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. [Human Rights Policy, 2022: crreport.kelloggcompany.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: 'Suppliers must provide their Employees safe and healthy working conditions, including potable drinking water, adequate sanitation, lighting, temperature, ventilation, and suitable facilities for women's health needs. Facilities should be structurally sound and well maintained in accordance with all applicable laws and regulations.'. [Supplier Code of Conduct, 2022: kelloggcompany.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect Working hours, the Supplier Code indicates: 'Suppliers shall comply with all applicable laws and regulations, or collective agreements, regarding maximum working hours, overtime, vacation time, leave periods, maternity/paternity leave, and public holidays. All overtime hours are to be voluntary and compensated at a premium rate. Working hours are not to be excessive, such that the health or safety of the Employee are negatively impacted. Appropriate rest time, mealtime, and days off are to be provided to ensure a safe working environment and in accordance with all local laws or collective agreements.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a maximum of 48 hours regular working week (and maximum of 60 including overtime). [Supplier Code of Conduct, 2022: kelloggcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples’ rights (AG)	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: 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: The Company states that 'For all areas, we recognize the right of forest communities to self-determination, as codified in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), including the right to freely pursue economic, social, and cultural development through the management and use of natural resources such as forests.' However, 'to recognize' is not considered a formal statement of commitment according to CHRB wording criteria. [Global Policy on deforestation, 2020: crreport.kelloggcompany.com] • Not Met: Expecting suppliers to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Respecting the right to water • Not Met: Company's policy commits to obtain FPIC: According to its Palm Oil Policy, the Company requires its suppliers to 'Adhere to Free, Prior and Informed Consent of Indigenous Peoples'. However no commitment to FPIC for own operations, including all cases (beyond palm oil) was found. In addition, no commitment to VGGT, IFC or ILO Convention 169 was found. [Global Palm Oil Policy, 2020: crreport.kelloggcompany.com] • Not Met: Expecting suppliers to make these commitments <p>: The Global Supplier Code of Conduct states: 'Suppliers shall adhere to the principle of Free, Prior and Informed Consent of Indigenous Peoples. Suppliers must identify and engage with small-scale producers to ensure they have access to fair market value for their crops, goods or services. Suppliers shall not engage in any form of land-grabbing.' However, the Supplier Code does not include a requirement to respect the right to water. [Supplier Code of Conduct, 2022: kelloggcompany.com]</p>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	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: Women's rights: The HR policy states: 'As signatories, we are also committed to upholding the 10 principles of the United Nations Global Compact and the Women's Empowerment Principles'. [Human Rights Policy, 2022: crreport.kelloggcompany.com] • Met: Expects suppliers to respect at least one of these rights: The Company states in its supplier code: 'Special attention to ensure these rights are upheld should be given to those who are at heightened risk for vulnerability or marginalization including but not limited to women, young people, indigenous peoples, minorities, people with disabilities, and migrant or foreign workers.' [Supplier Code of Conduct, 2022: kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The HR policy states: 'As signatories, we are also committed to upholding the 10 principles of the United Nations Global Compact and the Women's Empowerment Principles'. [Human Rights Policy, 2022: crreport.kelloggcompany.com] • Met: Expecting suppliers to respect these rights: The Company states in its supplier code: 'Special attention to ensure these rights are upheld should be given to those who are at heightened risk for vulnerability or marginalization including but not limited to women, young people, indigenous peoples, minorities, people with disabilities, and migrant or foreign workers. These considerations should be done so in alignment with the various human rights instruments designed to protect the rights of individuals/groups including UN Conventions such as the UN Conventions on the Elimination of all Forms of Discrimination Against Women, UN Convention on the Rights of the Child, UN Convention on the Elimination of All Forms of Racial Discrimination, and the UN Convention on the Rights of Persons with Disabilities'. [Supplier Code of Conduct, 2022: kelloggcompany.com]
A.1.4	Commitment to remedy	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: The Company commits to remedy: The Company stated in its Human Rights Position Statement, 'It is our policy that our operations should not infringe upon the inherent rights of others and that should adverse impacts be discovered, we are committed to remediation in accordance with international standards and the expectations put forth by our customers, consumers, and stakeholders for us'. However, this document is no longer found in the public domain. On the other hand, the Company states in its Human Rights Policy: 'We are committed to ensuring our operations do not infringe upon the human rights of others and that

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>should adverse impacts be discovered, we will seek remediation aligned with Kellogg policies, international standards, and the expectations of our costumers, consumers, and stakeholders'. However, 'to seek remediation' is not considered a formal statement of commitment according to CHRB wording criteria. Finally, a similar statement is disclosed in its Human Rights Milestone 2020: 'We are committed to ensuring our operations do not infringe upon the human rights of others and that should adverse impacts be discovered, we will seek remediation aligned with Kellogg policies, international standards, and the expectations of our customers, consumers, and stakeholders.' However, this document is not considered a suitable source for policy statements under CHRB's revised approach. [Human Rights Policy, 2022: crreport.kelloggcompany.com] & [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]</p> <ul style="list-style-type: none"> • 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 • Met: Work with suppliers to remedy impact: The Company indicates in its Supplier Code: 'If Kellogg identifies violations with this Code, Kellogg will work with the supplier to remediate issues. If issues are not sufficiently resolved, Kellogg reserves the right to remove the Supplier from the supply chain'. [Supplier Code of Conduct, 2022: kelloggcompany.com]
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its Code of Ethics that 'Acts of violence, threats and physical intimidation have no place at Kellogg and can result in immediate disciplinary action, up to and including termination of employment.' In addition, in its Human Rights Policy the Company states: 'With regards to Human Rights Defenders (HRD), Kellogg supports the efforts of the Zero Tolerance Initiative and other initiatives [...] aimed at protecting the safety, welfare, and rights of human rights defenders to speak out in defence of indigenous lands and for community and cultural rights of indigenous communities. We do not condolence violence, threats, or intimidation in any way towards HRDs'. [Global Code of Ethics, 09/2019: kelloggcompany.com] & [Human Rights Policy, 2022: crreport.kelloggcompany.com] • Met: Company expect suppliers to make this commitment: The Company states in it's Supplier Code of Conduct 'Suppliers shall not engage in any form of retaliation including threats, intimidation, physical, or legal attacks against human or environmental rights defenders, or those exercising their rights to freedom of expression, association peaceful assembly or protest against the business or its operations'. [Supplier Code of Conduct, 2022: kelloggcompany.com] <p>Score 2</p> <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	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: Board level responsibility for HRs: In its 2018 Human Rights Report, the Company indicates: 'At the board level, human rights, including forced labour and modern slavery, are overseen by the Social Responsibility and Public Policy committee, which assists the Board in discharging its oversight responsibilities with respect to certain social and public policy issues.' In addition, the Company indicates in its Human Rights Milestones 2020: 'At the board level, human rights are overseen by the Social Responsibility and Public Policy subcommittee of the Kellogg Board of Directors, which assists the Board in its oversight responsibilities on certain social and public policy issues.' [Human Rights Milestones 2018, 2019: crreport.kelloggcompany.com] & [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] • Met: Describe HR expertise of Board member: The Company discloses information on its website about its Board members expertise, including the members of the Social Responsibility and Public Policy Committee: '[...] At the W.K Kellogg Foundation, Ms. Montgomery Tabron oversees the organization's work ensuring optimal child development by focusing on educated and healthy kids, and secure families, as well as its commitments to community and civic engagements, and racial equality.[...] Mr. Gillum served as a senior leader at General Motors Company where he was most recently the Vice President, Corporate Responsibility and Diversity.'

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			<p>Score 2</p> <ul style="list-style-type: none"> Met: Speeches/letters by Board members or CEO: The Company co-signed the WBCSD CEO Guide to Human rights, which is considered a proxy for this sub indicator. [WBCSD - CEO Guide to Human Rights, 2019: docs.wbcsd.org]
A.2.2	Board responsibility	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: Board/Committee review HRs strategy: The Company states in its Annual Report 2020: 'Kellogg Company's Social Responsibility and Public Policy Committee of the Board of Directors oversees our corporate responsibility strategy'. In addition, in its Proxy Statement 2021: 'The Committee also reviews the Company's policies, programs, practices and disclosures concerning: [...] sustainability; [...] responsible sourcing; [...]' Human rights is included in the Company's sustainability commitments (including responsible sourcing). [Annual Report 2020, 2021: s1.q4cdn.com] & [2021 Proxy Statement, 2021: sec.gov] Not Met: Examples/trends re HR discussion in the last reporting period: The Company discloses in their Annual Shareholder Meeting according the Company's Engagement Feedback (09/08/2018): 'Human rights, including forced labour, is overseen by the Social Responsibility and Public Policy committee of the Kellogg Board. Social Responsibility and Public Policy Committee. Pursuant to a written charter, the Social Responsibility and Public Policy Committee, among other things, assists the Board in discharging its oversight responsibilities with respect to certain social and public policy issues. The Committee reviews the Company's policies, programs and practices concerning public policy, government relations, philanthropic activities/charitable contributions, sustainability and related topics. The Committee is particularly focused on the intersection of philanthropy, public policy, and sustainability and the Company's goals. An update on human rights was given to this subcommittee in April, 2017. In addition, executive oversight is led by Diane Holdorf, Chief Sustainability Officer, and Alistair Hirst, SVP of Global Supply Chain. Leaders from Human Resources, Supply Chain, Procurement, Sustainability, and Legal work together definite Human Rights strategy, identify risks, and execute strategies as part of a cross-functional Human Rights Working Group'. However, no further evidence found, including the last reporting period. <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	0.5	<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: Incentives for at least one board member: In its 2018/2019 CR Report, the Company states that 'numerous leaders are accountable for achieving specific corporate responsibility commitments, based on their roles. Our CEO, SVP, CSO and other leaders have annual performance goals tied to the company's Corporate Responsibility metrics'. On the other hand, the Company indicated in its Human Rights Policy: 'At all levels, relevant and appropriate annual performance goals are assessed based on sustainability metrics, which include human rights'. The CEO is a member of the Board of Directors. [Corporate Responsibility Report 2018/2019, 06/2019: crreport.kelloggcompany.com] & [Human Rights Policy, 2022: crreport.kelloggcompany.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 bussiness model and strategy 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

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 Company indicates in its Human Rights Policy: 'At the executive level, human rights issues are overseen by the Chief Sustainability Officer, who reports to the Senior Vice President of Global Corporate Affairs'. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] & [Human Rights Policy, 2022: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The Company indicates in its Human Rights Milestone 2020: 'At the daily work level these topics are managed collaboratively by our Sustainability, Procurement, Legal, Human Resources, Supply Chain, and Ethics and Compliance functions with each group involved in various capacities and different aspects of responsibility'. The Company also indicates in its Human Rights Policy: 'At the day-to-day level, implementation of various human rights activities are executed regionally by Responsible Sourcing Managers, Category Managers, Sustainability Team members, and coordinated by the Sr. Manager, Global Sustainability and SME for human rights due diligence'. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] & [Human Rights Policy, 2022: crreport.kelloggcompany.com] • Met: Day-to-day resources and expertise allocation in own ops: The Company indicates: 'At the executive level, human rights issues are overseen by the Chief Sustainability Officer, who reports to the Senior Vice President of Global Corporate Affairs. We also convene a global cross-functional team comprised of Sustainability, Human Resources, Procurement, Environment Health & Safety, Communications and Legal to assess and track our global activities to inform our Human Rights Policy and strategy. Each group is involved in decisions related to issues such as child labor, forced labor, freedom of association and collective bargaining, health and safety, land rights, water and sanitation, and women's rights.' In addition, The HR policy states that 'Other functional leaders, including legal and procurement, at the global and regional levels are also responsible for human rights strategy implementation oversight as is relative to their role'. • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: In its 2018/2019 CR Report, the Company states that 'numerous leaders are accountable for achieving specific corporate responsibility commitments, based on their roles. Our CEO, SVP, CSO and other leaders have annual performance goals tied to the company's Corporate Responsibility metrics'. On the other hand, the Company indicated in its Human Rights Policy: 'At all levels, relevant and appropriate annual performance goals are assessed based on sustainability metrics, which include human rights'. [Corporate Responsibility Report 2019/2020, 2020: crreport.kelloggcompany.com] & [Human Rights Policy, 2022: crreport.kelloggcompany.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 2021 Proxy Statement: 'The Board utilizes our Enterprise Risk Management ("ERM") process to assist in fulfilling its oversight of the Company's risks. While risk oversight is a full Board responsibility, the responsibility for monitoring the ERM process has been delegated to the Audit Committee. [...] Due to the dynamic nature of risk and the business environment generally, at every Audit Committee meeting, the Company provides a status report on key enterprise risks, and regularly provides in-depth reviews on select topics. ERM topics are also discussed in other Committee meetings. In addition, Board and Committee agendas are updated throughout the year so that enterprise risks are reviewed at the relevant times. This process facilitates the Board's ability to fulfil its oversight responsibilities of Kellogg's risks in a timely and effective manner.' According to the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company's CDP Climate disclosure 2017, risks contained in the ERM process are outlined in the Corporate Responsibility report, including Human rights. However, this evidence is more than 3 years old. No new evidence showing human rights are integrated in in the ERM system was found. [2021 Proxy Statement, 2021: sec.gov]</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	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: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: In its 2018/2019 Corporate Responsibility Report, the Company indicates: 'Employees continue to receive annual training on the Code that addresses anti-corruption, anti-competitive behavior, data protection and human rights.' In addition, the Company states on its website that its Code of Ethics is available in 14 languages. [Corporate Responsibility Report 2018/2019, 06/2019: crreport.kelloggcompany.com] & [Ethics and Culture, N/A: kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Company indicates in its Supplier Code: 'It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification.' However, this subindicator looks for evidence of how Company's policy is communicated to external stakeholders different than suppliers, including local communities (communication to suppliers is assessed in b.1.4.b) [Human Rights Policy, 2022: crreport.kelloggcompany.com] • 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: Requires suppliers to communicate policy requirements: The Company indicates in its Supplier Code: 'It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification.' This requirement 'includes all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (each a "Supplier" and collectively "Suppliers"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all employees, including permanent, temporary, contract, foreign, or migrant workers (each an "Employee" and collectively "Employees").' [Supplier Code of Conduct, 2022: kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: These conditions are made binding by being in the Supplier Code of Conduct. Suppliers must comply at all times during the performance of its obligations under their Purchase Order with the terms of the Kellogg Supplier Code of Conduct. In addition, the Company indicates in its Supplier Code: 'Acknowledgement and agreement to the tenets of this Code are required in every Kellogg contract. In the absence of a direct contract, acceptance of a Purchase Order, and its associated standard Terms & Conditions, commits the Supplier and all of its operations to adherence of this Code'. [Supplier Code of Conduct, 2022: kelloggcompany.com] • Met: Company requires suppliers to cascade down to their suppliers: As indicated above, the Global Supplier Code of Conduct states: 'It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification'. This requirement 'includes all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (each a "Supplier" and collectively "Suppliers"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all employees, including permanent, temporary, contract, foreign, or migrant workers (each an "Employee" and collectively "Employees").' [Supplier Code of Conduct, 2022: kelloggcompany.com]
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See A.1.2.a • Met: How workers are trained on HR policy commitments: The Company states in its Corporate Responsibility report 2018/2019: 'Employees continue to receive

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>annual training on the Code that addresses anti-corruption, anti-competitive behavior, data protection and human rights'. In addition, the Company reports in its Human Rights Milestone 2020 that during 2020-2021: 'A refreshed Code of Ethics and training module was rolled out to the workforce. To reinforce the training, a 16-month series of communications will be shared to bring Code provisions to life'. [Corporate Responsibility Report 2018/2019, 06/2019: crreport.kelloggcompany.com] & [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]</p> <ul style="list-style-type: none"> • Not Met: Trains relevant managers including procurement: The Company indicates in its Policy Statement Prohibiting Involuntary Labor: 'a more detailed training and discussion regarding the risks and implications of involuntary labour was presented to our global procurement leaders and managers during our 2015 Global Procurement Summit.' However, this piece of evidence is now outdated. No further evidence was found. [Policy Statement Prohibiting Involuntary Labor, 2016: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • 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 indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates in its CR Report 2018/2019: 'Our cross-functional team of leaders continues to meet monthly to review our monitoring and verification processes. We also use Sedex self-assessments and third-party audits to monitor our suppliers, and complete Sedex self assessments for our own manufacturing facilities'. [Corporate Responsibility Report 2018/2019, 06/2019: crreport.kelloggcompany.com] • Met: Proportion of supply chain monitored: The Company states that As of 2020, 96% of global in-scope suppliers have registered with the Sedex platform and 95% have registered and linked all Kellogg supplying sites. This aids Kellogg to more accurately track Tier 1 supply chain locations and assess current audit status including open non-conformances or pending actions. In scope refers to suppliers within the Top 80% spend profile, high risk commodity suppliers, and/or those with high exposure to contract labor'. [Human Rights Milestones 2020, 2021: filecache.mediaroom.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: Describes corrective action process: The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. No information was found describing the corrective action process of non-compliances found during monitoring (audit) process. • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	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: HR affects selection of suppliers • Met: HR affects on-going supplier relationships: The Company states in its Supplier Code: 'Kellogg reserves the right to verify compliance with this Code through internal or external assessment mechanisms such as, but not limited to, self-assessment questionnaires, independent assessments, surveys, and audits. We reserve the right to terminate any agreement or business relationship in which a Supplier does not comply with this Code.' [Supplier Code of Conduct, 2022: kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe positive incentives offered to respect human rights: The Company indicates in its KTC Disclosure 2020: 'The company: [...] (3) provides procurement incentives to first-tier suppliers to encourage or reward good labor practices (such as price premiums, increased orders, and longer-term contracts); [...]' [Know the Chain Addition Disclosure 2020, 2020: business-humanrights.org] • Not Met: Working with suppliers to meet HR requirements: The Company has provided comments to CHRB regarding this indicator. However, this information has not been found in publicly available sources.

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company discloses information about different projects where it engages with suppliers' workers and communities in its Human Rights Milestone 2020, such as: ELEVATE Supplier Assessment Pilot, Vanilla in Madagascar, Sultanas in Turkey, etc. However, no evidence describing the process the Company puts in place to identify and engage with affected stakeholders was found. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] • Not Met: Discloses stakeholders that HRs may be affected • Met: Provides two examples of engagement with stakeholders: The Company reports that: 'In 2019, Kellogg partnered with ELEVATE to develop a comprehensive long-term, data driven responsible sourcing strategy that addresses salient rights risks within priority Tier 1 ingredient and packaging supply chains. During the first phase of this work ELEVATE's segmentation services mapped the supply chain based on inherent sourcing risks and business leverage insights to determine which segments of the supply chain provide the greatest opportunity for Kellogg to influence change. [...] For the execution phase of this work, Kellogg partnered with 16 suppliers representing 26 individual site locations. [...] These assessments included: Worker Voice Survey: Worker Sentiment Survey, or Critical Issues; On-site Social Assessment -ELEVATE Responsible Sourcing Assessment (ERSA); Child Labor Self-Assessment Questionnaire. The assessments were carried out both in-person and virtually[...] The assessment execution phase ran primarily from November 2020 through April 2021. Throughout this timeframe, 15 suppliers representing 21 sites participated in the program. An additional 6 sites will complete their assessments by the end of 2021. Our goal for this program was to partner with our Tier 1 suppliers to gain a deeper understanding of potential and actual human rights risks present within our supply chain'. On the other hand, the Company reports about its Vanilla Madagascar project: 'Kellogg and its vanilla supplier, Symrise, are supporting efforts to protect the land to help improve livelihoods of 1,000 Malagasy smallholder vanilla farmers and their families in the Ankavanana region. The project trains farmers to become more climate and financially resilient, as well as educate how to incorporate diverse crops on their land to increase access to more nutrients in the diet'. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Analysis of stakeholder views on company's HR issues: The Company discloses the results of the Worker Sentiment Survey from ELEVATE Supplier Assessment Pilot. The Grievance Mechanism and Wages and Hours were the topics with the lowest scores: 'Results were generally positive but there were isolated reports of issues with inability to refuse overtime, harassment, willingness of workers to raise grievances, and accurate working hour timekeeping records' [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] • Not Met: Describe how views influenced company's HR approach: In addition, the Company indicates: 'For the purposes of this pilot, we are currently working back with ELEVATE on remediation plans to follow up on findings and identified issues. As in our own operations, our goal is to ensure a safe and sustainable working environment for all employees in our supply chain operations.' However, this seems to be a work in progress. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]

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:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company reports in its Human Rights Milestone 2020: 'In 2019, we undertook a third-party verification exercise with ELEVATE to reassess our salient human rights risks, both for owned operations and within our supply chain. In 2020, informed by this assessment, Kellogg updated policies, due diligence methodology, and reporting. This approach is aligned with the UNGP guidance on identifying areas where the risk of adverse human rights impacts is most significant.' [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: The Company states that it 'utilizes a combination of publicly available indices from reputable sources and Sedex to assess forced labour risk for supplier operations. Risk factors include regional location of operations, sector or commodity, degree of salience to industry identified issues, and supplier specific information. In 2018, Kellogg also began using the service SmartRisk to send real time risk alerts gleaned from various online sources to our Procurement department and other related functions to increase response time to issues as they become known'. In addition, the Company reports in its Human Rights Milestone 2019: 'In 2020, Kellogg and ELEVATE are kicking off phase 2 of this engagement to assess prioritized high risk Tier facility sites. Assessments are tailored to evaluate the salient rights risks identified by Kellogg based on facility location and supplier type. This work is a continuation of the 2019 supplier segmentation process and will continue into 2021'. Finally, in its Human Rights Milestone 2020, it reports: 'Kellogg utilizes a combination of publicly available indices from reputable sources, including Sedex Radar, to assess forced labor risk for supplier operations by region and commodity.' [Corporate Responsibility Report 2018/2019, 06/2019: crreport.kelloggcompany.com] & [Human Rights Milestones 2019, 07/2020: crreport.kelloggcompany.com] Score 2 • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company reports that 'In 2019, Kellogg partnered with ELEVATE to develop a comprehensive long-term, data driven responsible sourcing strategy that addresses salient rights risks within priority Tier 1 ingredient and packaging supply chains. During the first phase of this work ELEVATE's segmentation services mapped the supply chain based on inherent sourcing risks and business leverage insights to determine which segments of the supply chain provide the greatest opportunity for Kellogg to influence change. [...] For the execution phase of this work, Kellogg partnered with 16 suppliers representing 26 individual site locations. [...] These assessments included: Worker Voice Survey; Worker Sentiment Survey, or Critical Issues; On-site Social Assessment -ELEVATE Responsible Sourcing Assessment (ERSA); Child Labor Self-Assessment Questionnaire The assessments were carried out both in-person and virtually[...] The assessment execution phase ran primarily from November 2020 through April 2021. Throughout this timeframe, 15 suppliers representing 21 sites participated in the program. An additional 6 sites will complete their assessments by the end of 2021. Our goal for this program was to partner with our Tier 1 suppliers to gain a deeper understanding of potential and actual human rights risks present within our supply chain'. However, this datapoint looks for evidence of a global system in place to identify potential risks and impacts. Current evidence seems to focus in 'priority tier 1 ingredient and packaging supply chain'. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company reports in its GRI Index 2021: 'In 2020 we partnered with external consulting group ELEVATE to review our internal manufacturing operations and T1 supplier sites to determine an updated set of salient human rights risks. From this review we focused on seven human rights risks that were most material to our business and where we could make the greatest impact. These can be found in our Human Rights Policy. [...] Within our supply chain we also piloted, with ELEVATE, a human rights assessment program focused on worker voice, child labor, and audit. These assessments covered 26 high risk supplier sites. ' However, no further evidence was found describing the assessment process for its own operations, including factors taking into account to the level of human risks, such as social, geographical, economic, etc. [GRI Index 2020/21, 2021: filecache.mediaroom.com] • Met: How process applies to supply chain: See above. In addition, the Company reports in its Human Rights Milestone 2020: 'In 2019, Kellogg partnered with ELEVATE to develop a comprehensive long-term, data driven responsible sourcing strategy that addresses salient rights risks within priority Tier 1 ingredient and packaging supply chains. [...] For the execution phase of this work, Kellogg partnered with 16 suppliers representing 26 individual site locations. [...] These assessments included: Worker Voice Survey; Worker Sentiment Survey, or Critical Issues; On-site Social Assessment -ELEVATE Responsible Sourcing Assessment (ERSA); Child Labor Self-Assessment Questionnaire The assessments were carried out both in-person and virtually[...] Our goal for this program was to partner with

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>our Tier 1 suppliers to gain a deeper understanding of potential and actual human rights risks present within our supply chain. [...] Kellogg utilizes a combination of publicly available indices from reputable sources, including Sedex Radar, to assess forced labor risk for supplier operations by region and commodity. • Risk factors include regional location of operations, sector or commodity, degree of salience to industry identified issues, and supplier specific information.' [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]</p> <p>• Met: Public disclosure of the results of HR assessment: The Company discloses the salient human rights risks identified in its Human Rights Policy, including: forced labor, child labor, migrant labor, health and safety, discrimination and harassment, wages and working hours. [Human Rights Policy, 2022: crreport.kelloggcompany.com]</p> <p>Score 2</p> <p>• Not Met: Meets all requirements under score 1</p> <p>• Met: How it involved affected stakeholders in the assessment: As indicated above, the ELEVATE Suppliers Assessment Pilot included: 'Worker Voice Survey: Worker Sentiment Survey, or Critical Issues; On-site Social Assessment -ELEVATE Responsible Sourcing Assessment (ERSA); Child Labor Self-Assessment Questionnaire' [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]</p>
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> <p>• Met: Action Plans to mitigate risks: The Company discloses information of how it works to face its salient human rights risks in its Human Rights Policy. It indicates that it is working 'to build capability, embed human rights in our standard work and measure and report on progress' in three areas: Kellogg's Facilities, Tier 1 Suppliers and Ingredients Origins. There is a description of the Company's actions in each one of these three areas (Facilities, Tier 1 Suppliers and Ingredients Origin). [Human Rights Policy, 2022: crreport.kelloggcompany.com]</p> <p>• Met: Description of how global system applies to supply chain: As indicated above, the Company discloses information of how it is working on its Tiers 1 Suppliers to face the salient human rights risks identified in its Human Rights Policy. For instance, it indicates: 'Building capability: We are working to ensure awareness across our procurement teams and suppliers about the salient human rights risks, our human rights strategy & policies, and industry and bespoke programs.[...]' [Human Rights Policy, 2022: crreport.kelloggcompany.com]</p> <p>• Not Met: Example of actions decided on at least 1 salient HR issues: The Company states in its CR Report 2017/2018: 'Should a critical violation of our policies, such as an incidence of Involuntary Labour, be reported or uncovered, Kellogg has an escalation procedure in place to ensure rapid response and immediate mitigation and remediation of the issue. [...] The suspension of the RSPO certification of IOI Group on March 25 means that Loders Croklaan is no longer in compliance with our palm oil policy and commitments. In January 2016, Kellogg began the process of removing this supplier from our supply chain. As of March, 67% of Loders volume has been transitioned to other suppliers in compliance with our policy. The remaining Loders volume (6% of global Kellogg palm usage) was transitioned over the next 90 days.' However, this document is more than 3 years old. On the other hand, the Company discloses information in its Human Rights Policy of general actions put in place to face salient human rights in three areas: Facilities, Tier 1 Suppliers and Origins Ingredients. However, no examples of actions to face a specific salient human rights issue was found. [Corporate Responsibility Report 2017/2018, 2018: crreport.kelloggcompany.com]</p> <p>Score 2</p> <p>• Not Met: Meets all requirements under score 1</p> <p>• Not Met: Involve stakeholders in decisions about actions</p>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Not Met: System for tracking or monitor if actions taken are effective: The Company disclosed the following information to the CHRB (25/07/2018): 'Tracking actions taken in response to human rights risks and impacts, including communication of outcomes and learnings and assessment of effectiveness, are conducted by the team that responded to the initial issue.- Issues raised through our Ethics and Compliance mechanisms are logged and tracked in a central location with resolutions and applied learnings. - Issues raised through global or regional Rapid Response Teams are handled directly by the team in conjunction with affected parties and internal stakeholders. Resolution and potential future implications are tracked and monitored. Policy or procedural changes, if warranted, undergo a global stakeholder review process. Issues raised through the audit process are handled as follows: "Should a critical violation be uncovered during any</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>of these processes Kellogg has a Critical Response Action Plan to alert senior executives and assess plans for immediate remediation of the issue(s). These are reviewed on a case-by-case basis and next steps executed accordingly, relevant to risk to affected people, communities, and business operations. Non-critical violations are managed through the supplier and the third party audit body. Tracking of resolution of these issues is done through Sedex and internal Kellogg systems with the expectation that suppliers complete the Corrective Action Plan requirements agreed to during the audit'. However, evidence based on a document that now out of date. No further evidence found. On the other hand, the Company highlights its information included in its Human Rights Milestone 2020 about the number of cases received, substantiated and closed by its grievance channel. However, this evidence is evaluated in C indicators. This subindicator looks for evidence of how the Company tracks and measures if salient issues are being mitigated in an effective manner. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] & [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]</p> <ul style="list-style-type: none"> • Not Met: Lessons learnt from checking system effectiveness <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
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders <p>Score 2</p> <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: In accordance with the Company Code of Ethics, reports can be made to Office of Ethics and Compliance via several different procedures. In addition, it has Ethics Alertline which is maintained by a third-party confidential reporting company. Office of Ethics and Compliance then receive reports from the company for investigation and follow-up. Calls are answered in local languages. [Global Code of Ethics, 09/2019: kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: It also indicates in its Human Rights Milestone 2020 that its 'The Hot Line is operated for Kellogg by a third-party, confidential reporting company and always available to over 30,000 Kellogg employees in 21 countries in the caller's local language.' Information about the Hot Line and Ethics Point is included in the Code of Ethics. The Company also indicates that during 2020-2021: 'A refreshed Code of Ethics and training module was rolled out to the workforce. To reinforce the training, a 16-month series of communications will be shared to bring Code provisions to life.' [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company indicates in its Supplier Code: 'Suppliers shall provide means for confidential complaint/concern reporting to all Employees, taking into consideration the best practice guidelines highlighted in the UN Guiding Principles. Issues should be addressed in a timely and respectful manner and include documentation of corrective actions. In addition to this, we encourage Suppliers to communicate the availability of Kellogg Company's ethics hotline as a way for Employees throughout our collective supply chain to report grievances.' [Supplier Code of Conduct, 2022: kelloggcompany.com] • Met: Expect Suppliers to convey expectation to their own suppliers: See above [Supplier Code of Conduct, 2022: kelloggcompany.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 states in its Human Rights Milestone 2019: 'Our Ethics Hot Line offers a confidential way for employees, suppliers, contractors and the general public to ask questions and report concerns in relation to ethics, compliance or any other requirements in our Code immediately and anonymously 24 hours a day, 7 days a week via telephone, internet or mobile app'. [Human Rights Milestones 2019, 07/2020: crreport.kelloggcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: Country and language specific accessibility is provided for all countries of operations. Local numbers can be accessed through the Global Ethics and Kellogg Alterline homepage. The Ethics Line website is available in 15 languages. However, no information about how it ensures that all affected external stakeholders at its own operations are aware of the existence of the grievance mechanism. The Company provided feedback to CHRB regarding this indicator, but the supporting document has not been found in publicly available sources. [Kellogg's Company website, N/A: kelloggcompany.com] & [Ethics line - FAQ, N/A: secure.ethicspoint.com] • Not Met: Communities access mechanism direct or through suppliers: The supplier code indicates: 'This Global Supplier Code of Conduct outlines the standards and business practices to which we require all of our direct and extended Suppliers to adhere. The scope of this requirement includes all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (each a "Supplier" and collectively "Suppliers"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all employees, including permanent, temporary, contract, foreign, or migrant workers (each an "Employee" and collectively "Employees"). It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification. [...] suppliers shall provide means for confidential complaint/concern reporting to all Employees, taking into consideration the best practice guidelines highlighted in the UN Guiding Principles'. However, no evidence found of the Company expecting suppliers to have the mechanism open to all external stakeholders. [Supplier Code of Conduct, 2022: kelloggcompany.com] • Not Met: Expect supplier to convey expectation to their own suppliers: As above [Supplier Code of Conduct, 2022: kelloggcompany.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages users to create or assess system: The Company indicates in its Human Rights Milestone 2020 that during 2018-2019 it 'Continue Regional Partnership to identify and implement opportunities for improvement and explore pathways to promote the Hot Line beyond our employees and contractors.' [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] • 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 • 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	0.5	<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: Response timescales and how complainants will be informed: The Company indicates on its Ethics Point FAQ website: 'The time to review and investigate each report varies depending upon the nature of the allegation. Our goal is to close out the all cases as quickly as possible. [...] When you use the unique Report Key to access your case, you may learn that the matter is still under investigation or that it has been closed. We cannot provide specific details on the investigation, such as: with whom we have spoken, the outcome, any disciplinary or other corrective action that has occurred. We restrict this information due to privacy concerns and to preserve the integrity of our investigations.' In addition, in its Human Rights Milestone, it reports: 'Our goal is to complete investigations within 30 days. However, completion timelines may vary depending upon additional factors such as the availability of witnesses, etc.' [Ethics line - FAQ, N/A: secure.ethicspoint.com] & [Human Rights Milestones 2020, 2021: filecache.mediaroom.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: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. A description of how complainants may ask for escalation to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome is needed.

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation: The Company states in its Code of Ethics: 'We support honest and open communication and encourage our employees to report concerns. We will not tolerate retaliation against anyone who discloses actual or suspected violations. Retaliation will result in disciplinary action up to and including termination of employment'. In addition, in its Ethics Point FAQ it indicates: 'Retaliation against an Employee for reporting an issue in good faith is a violation of our Global Code of Ethics, our policies, our K Values, and potentially, the law. Any Employee who engages in retaliation, or threatens retaliation, will be subject to disciplinary action, up to and including termination.' However, the statements seems to be focused only in employees. It is not clear that external stakeholders can file complaints and that they are protected by the non retaliation commitment. [Global Code of Ethics, 09/2019: kelloggcompany.com] • Met: Practical measures to prevent retaliation: The Company sets disciplinary measures against retaliation: 'Retaliation will result in disciplinary action up to and including termination of employment.' It also indicates: 'You may also report any actual or suspected violations anonymously by contacting the Ethics Line. Our Ethics Line is maintained by a third-party confidential reporting company. Its representatives will forward your concerns to our Office of Ethics and Compliance for investigation. Reports submitted will be handled promptly and discreetly. We will maintain confidentiality to the greatest extent possible'. [Global Code of Ethics, 09/2019: kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: The Company disclosed to CHRB (25/07/2018): 'Kellogg has never brought a retaliatory suit against persons who have brought, or tried to bring, a case against Kellogg involving credible allegation(s) of adverse human rights impacts or against the lawyers representing them (retaliatory civil litigation, including for defamation, filing criminal complaints, or any similar actions against claimants or their lawyers), or fired any workers who have brought, or tried to bring, a case against Kellogg involving an allegation of human rights abuse, or engaged in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers.' However, this document is older than 3 years old. On the other hand, the Company makes a reference to its Anti-Retaliation Policy in its Code of Ethics, however, such policy was not found in the public domain. [Global Code of Ethics, 09/2019: kelloggcompany.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: In the Supplier Code of Conduct, the Company indicates: 'This Global Supplier Code of Conduct outlines the standards and business practices to which we require all of our direct and extended Suppliers to adhere. The scope of this requirement includes all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (each a "Supplier" and collectively "Suppliers"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all employees, including permanent, temporary, contract, foreign, or migrant workers (each an "Employee" and collectively "Employees"). It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification. [...] Suppliers shall not engage in any form of retaliation including threats, intimidation, physical, or legal attacks against human or environmental rights defenders, or those exercising their rights to freedom of expression, association, peaceful assembly, or protest against the business or its operations'. However, grievance reporting mechanism is required only for suppliers' employees. No evidence found that there is a requirement for suppliers to allow grievances for suppliers' external stakeholders. [Supplier Code of Conduct, 2022: kelloggcompany.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)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The Company reports the state of grievances in its 'Palm Oil Grievance Tracker' document. With respect to the grievance raised by Greenpeace, RAN, IRLF, etc. on September 2019 related to 'Extensive labour rights abuses have been documented in FGV's Malaysian operations, including workers having to pay recruitment fees and having their passports retained by the company', the Company indicates the following action: 'On 21 November 2019, FGV announced that they have been accepted as a Participating Company of the Fair Labor Association (FLA). Under this affiliation programme, FGV is also expected to align its internal standards with the FLA Workplace Code of Conduct as well as to develop a comprehensive social compliance and remediation programme based on the Code of Conduct and the Principles of Fair Labor and Responsible Sourcing or Production for Agricultural Supply Chains. [...] On 15 January 2020, FGV issued a statement to clarify their position. On 24 January 2020, FGV issued second statement where they have transparently uploaded all the audit reports and provided their clarifications to the findings. FGV intent to appeal to the RSPO's latest decision and we are following up closely on this matter. Our last meeting with FGV was on 21 January 2020.' <p>However, no further information found, including description of how remedy has been provided. [Palm Oil Grievance Tracker, 02/2020: crreport.kelloggcompany.com]</p> <ul style="list-style-type: none"> • 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: The Company indicates in its Human Rights Milestone 2020 with respect its grievances mechanisms: 'Lessons learned are leveraged to prevent and detect future misconduct, ensure compliance, and identify any other opportunities for improvement'. However, no further details found, including approach to introduce changes. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]
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: The Company discloses information in its Human Rights Milestone 2020 about its grievance channels: its Ethics Hotline and MyHR Portal. In its Ethics Hot line, the Company received 324 complaints (none of Forced Labor) and in MyHR Portal it received 332 complaints (none of them about Forced Labor). It also reports that it closed 321 complaints from its Ethics Hot line and substantiated 102 cases. However, it is not clear how many human rights complaints were filed overall, and closed or addressed for different groups of complainants (employees and external individuals). [Human Rights Milestones 2020, 2021: filecache.mediaroom.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)	0.5	<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: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company's Supplier Code reads: 'Suppliers must provide fair compensation that is, at a minimum, in compliance with all applicable wage and hour laws, rules, and regulations, including those associated with legally mandated benefits, overtime work, and other premium payment situations. Wages should be applied at a rate that is comparable with relevant standard industry living wage compensation.' [Supplier Code of Conduct, 2022: kelloggcompany.com] • Not Met: Improving living wage practices of suppliers [Human Rights Milestones 2020, 2021: filecache.mediaroom.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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) • 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
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company discloses information about different efforts to map a part of its Supply Chain, for example through the Origins Program: 'As of the end of 2020, Kellogg's Origins™ has reached more than 440,000 farmers in 29 countries around the world. Our Global Kellogg's Origins™ map shows cases details from programs past and present.' On the other hand, the Company discloses information about Palm Oil Supplier Mills and in its Palm Oil Milestone 2020 it reports: 'Beginning in 2019, in partnership with Proforest, Kellogg began providing our direct Tier 1 suppliers annual Supplier Scorecards. The goal is to support the advancement of reporting on the sustainability of their palm oil operations, facilitate communication and provide recommendations to close current gaps in performance. In 2020, based on supplier responses and publicly available information searches, Proforest compiled Scorecards and Factsheets for a total of 16 suppliers, representing 9% of our total procured volumes.' However, no further evidence was found indicating that the Company identifies direct and indirect suppliers back to manufacturing sites all over its supply chain, and not only for specific ingredients. [Responsible Sourcing Annual Milestones 2020, 2021: filecache.mediaroom.com] & [Pal Oil Supplier Mills, 2020: filecache.mediaroom.com] <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 discloses information about Palm Oil Suppliers Mills, however, no further information about the rest of its supply chain was found, or explanation on whether palm oil represents the most significant part of its supply chain and why. [Pal Oil Supplier Mills, 2020: filecache.mediaroom.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities: The Company reports in its Human Rights Milestones 2021: 'In 2019, Kellogg partnered with ELEVATE to develop a comprehensive long-term, data driven responsible sourcing strategy that addresses salient rights risks within priority Tier 1 ingredient and packaging supply chains. [...] During the first phase of this work ELEVATE's segmentation services mapped the supply chain based on inherent sourcing risks and business leverage insights [...]'. However, no further information about which suppliers are involved in higher-risk activities. [Human Rights Milestones 2020, 2021: filecache.mediaroom.com]
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 Global Supplier Code of Conduct states 'Suppliers shall not employ anyone under the age of 15, under the minimum age of work, or under the minimum age for completing mandatory schooling as specified by local law. Suppliers must follow the higher law/requirement in instances where there is a contradiction. Suppliers shall comply with ILO Convention 138 on the Minimum Age for Admission to Employment and Work, and Convention 182 on the Elimination of the Worst Forms of Child Labour. Exceptions are subject to those allowed under national law and outlined by the ILO. Per the ILO, any work that is likely to jeopardize children's safety or physical, mental, or moral health should not be done by anyone under the age of 18'. In addition, the Company carries out third party audits through SEDEX's SMETA, which includes age verification. No evidence found, however, of requiring remediation programmes in case child labour is found. [Supplier Code of Conduct, 2022: kelloggcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on child labour: The Company indicates in its Responsible Sourcing 2020: 'We have begun work with our supplier to confirm the traceability of hazelnuts in our ingredients, as well as activities underway to protect farmer and worker rights, combat forced and child labor and ensure a safe and healthy workplace for all.' In addition, in its Human Rights Milestone 2020, the Company reports: 'In September 2018, Kellogg partnered with supplier Barry Callebaut to kick off a two-year pilot program aimed at remediating and mitigating the risks of child labor in the cocoa farming community of Nsuekyir, Ghana. The project consists of a package of interventions designed to provide educational support to the children of cocoa farming families, teacher support to local educators, farmer support, and community support. The pilot program design is predicated on the idea that to fight child labor, holistic community wide solutions are required and that by supporting families and communities we can empower people with the resources they need to benefit from sustainable long-term change.' [Responsible Sourcing Annual Milestones 2020, 2021: filecache.mediaroom.com] & [Human Rights Milestones 2020, 2021: filecache.mediaroom.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 Company states in their Global Supplier Code of Conduct 'Suppliers must follow the "Employer Pays Principle" and adhere to the tenet of the Priority Industry Principles that "No worker should pay for a job". Employees shall not pay any fees or costs to the Supplier, Labour Agent/Agency, or any other third party associated with recruitment. Examples of fees and costs include, but are not limited to, legal fees, travel, lodging, passport and visa processing, medical exams, in-country support services, personal protective equipment, and training'. [Supplier Code of Conduct, 2022: kelloggcompany.com] • Not Met: How working with suppliers on debt & fees: In the document Progress Against Forced Labour Report the Company indicated how after a Verisk Maplecroft assessment of exposure in their organic apples supply chain in Turkey it determined 'more investigation was needed regarding issues of migrant worker rights, forced labour, debt bondage, child labour, wages and working hours.' The Company details how they have engaged with suppliers (with the help of Control Union) which has resulted in suppliers improving annual training and implementing best practices to address these issues among its farmers and their workers'. However, this document is now out of date. No further evidence found in more recent sources. [Progress Against Forced Labor: 2017, 05/2018: kelloggs.co.uk] <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: Evidence was based in a document that is now out of date. No further evidence found in more recent sources. [Progress Against Forced Labor: 2017, 05/2018: kelloggs.co.uk]
D.1.5.d	Prohibition of forced labour: Wage practices (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: Suppliers to pay workers in full and on time in codes or contracts: The Company indicates in its Supplier Code: 'Suppliers shall provide Employees with timely payment and include transparent wage statements that can be used to verify compensation.' However, no requirement to paying workers in full was found. [Supplier Code of Conduct, 2022: kelloggcompany.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 Global Supplier Code of Conduct states 'Suppliers must not restrict Employees' freedom of movement through confining, imprisoning, or detention during or outside of work hours at any location, including worksites or Employee residences in accordance with the Priority Industry Principles' tenet that "Every worker should have freedom of movement". Suppliers shall not withhold, or keep in their possession, any Employee documents or items, including passports, identity papers, jewellery, ATM cards, or land deeds. All efforts should be made to provide Employees with safe and secure locations to keep such items, which they may access at any time without notification to, or intrusion from, any other individuals.' [Supplier Code of Conduct, 2022: kelloggcompany.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 Global Supplier Conduct states: 'Suppliers must respect the rights of their Employees to freely associate, organize, and bargain collectively, where allowed by law. Employees, or their representatives, shall be allowed to openly communicate with management regarding working conditions or management practices without fear of discrimination, reprisal, retaliation, intimidation, or harassment. Where rights to freedom of association and collective bargaining are restricted under law, Suppliers shall facilitate, and not hinder, the development of parallel means for independent and free association and bargaining. This may include the facilitation of free choice by workers to elect their own workplace representatives.' [Supplier Code of Conduct, 2022: kelloggcompany.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 Company sets out clear health and safety requirements in the 'Quality, Health & Safety' section of its Supplier Code of Conduct. This covers product quality and safety ,the work environment (covering potable drinking water and adequate sanitation), occupational safety, housing and emergency preparedness. [Supplier Code of Conduct, 2022: kelloggcompany.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company discloses figures about its Total Recordable Incident Rate for the last six years (2020: 0,37). However, it is not clear if it includes information of suppliers' workers. • Not Met: Fatalities rate for lasting reporting period • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: In its 'Responsible Sourcing Annual Milestone 2018' document (published in 2019), the Company indicates: 'Continued participation in an industry group led project to improve cane cutter working conditions in the Veracruz region of Mexico through improvements to water, rest, and shade. With peer collaborators, industry group AIM Progress , La Gloria Mill , and implementation coordinators ABC Mexico , the project built shade shelter tents, increased access to potable water, provided additional personal protection equipment, and facilitated workers best practice training.' [Responsible Sourcing Annual Milestones 2018, 2019: crreport.kelloggcompany.com] • 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)	0.5	<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: Rules on land & owners in codes or contracts: The Company states in its Supplier Code of Conduct that 'Suppliers must respect the land rights of women, indigenous people, and local communities affected by their operations and sourcing practices. Suppliers must ensure transparent reporting and disclosure of concession agreements and/or operating permits. All documentation shall be provided to all affected communities in their primary language. Suppliers must ensure fair negotiation of land transfers and refrain from cooperating with any host government's illegitimate use of eminent domain to acquire land that will be used to provide products and services to Kellogg. Suppliers shall adhere to the principle of Free, Prior and Informed Consent of Indigenous Peoples. Suppliers must identify and engage with small-scale producers to ensure they have access to fair market value for their crops, goods or services. Suppliers shall not engage in any form of land-grabbing.' [Supplier Code of Conduct, 2022: kelloggcompany.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: The Company states in its Global Supplier Code of Conduct: Suppliers must provide their Employees safe and healthy working conditions, including potable drinking water, adequate sanitation, lighting, temperature, ventilation, and suitable facilities for women's health needs.[...] Facilities should promote basic human dignity through access to potable water, sanitary food preparation areas, reasonable personal space, adequate heat and ventilation, clean and well-maintained bathrooms, and showers. [...] Suppliers must strive to reduce and/or optimize their use of energy, water, and agricultural inputs, reduce greenhouse gas emissions, minimize water pollution, and waste, including food waste and landfill usage.' However, no provision related to refraining from negatively affecting access to safe water for local communities was found. [Supplier Code of Conduct, 2022: kelloggcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on water stewardship issues: The Company indicates that: 'Kellogg participated in an industry group project, led through AIM-Progress, to improve cane cutter working conditions in the Veracruz region of Mexico through improvements to water, rest and shade. With La Gloria Mill and implementation coordinators, ABC Mexico built shade shelter tents, increased access to potable water, provided additional personal protection equipment and facilitated workers' best practice training. [...] In Arkansas, our Supporting U.S. Farmers collaboration with The Nature Conservancy (TNC) provides rice farmers irrigation pump timers to manage irrigation efficiently and conserve water from the Alluvial Aquifer. Groundwater conservation is critical to meet Arkansas's thriving rice industry and drinking water needs, and excess groundwater pumping for irrigation can deplete aquifers and contribute to soil erosion from overirrigated fields. TNC and other local partners have installed irrigation timers on 30 Arkansas farms to manage water use on approximately 15,000 acres of land as of 2021, an increase from 27 farmers participating as of the end of 2020. As of 2020, the project has saved 4.72 billion gallons of valuable groundwater, with more impact to come in 2021. [...] Rice grown in Spain's Valencia and Delta Del Ebro regions goes into Kellogg's® Special K® cereals and other foods across Europe, but local challenges with soil salinity and crop pests can make rice production challenging. [...] The program also helped farmers implement [...], and implement irrigation strategies that reduce water use and greenhouse gas emissions without decreasing yield.[...] Soil and water stewardship, enhanced biodiversity and pollinator health and climate resilience are material issues in our almond ingredient supply chains. We are pleased to share a preview from our U.S. almond supplier of their forthcoming sustainability program. Blue Diamond Growers and its approximately 3,000 member-growers have a multi-generational history of sustainable almond growing. To further demonstrate that commitment, in 2020, Blue Diamond introduced an innovative Sustainability Incentive Program. The first-in-industry incentive of this scale, the plan rewards member-growers who document their practices and encourages progressively higher levels of commitment toward adopting additional sustainable measures in their almond orchards. This will enable Blue Diamond to share the cooperative's unique sustainability story more holistically.' [Responsible Sourcing Annual Milestones 2020, 2021: filecache.mediaroom.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 • Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights in codes or contracts: The Company states in its Supplier Code of Conduct: 'Suppliers shall act in accordance with ILO Convention No. 111 on Discrimination (Employment and Occupation) and make employment decisions including hiring, payment, benefits, advancement, termination, and retirement based on ability, qualifications, and achievements without preference or exclusion[...]. Suppliers must demonstrate that women and men with similar ability, qualifications, and achievements are afforded similar work opportunities, wages, benefits, contract terms, and facilities. [...] Suppliers must provide their Employees safe and healthy working conditions, including potable drinking water, adequate sanitation, lighting, temperature, ventilation, and suitable facilities for women's health needs.' [Supplier Code of Conduct, 2022: kelloggcompany.com] • Met: How working with suppliers on women's rights: The Company discloses information about its Vanilla in Madagascar project in its Human Rights Milestones 2020: 'Directly empowering women through improved representation in the leadership of farmers' groups and community associations. Currently, women comprise 20% of leadership positions within participating farmer groups.' In addition, in its 2019/2020 Corporate Responsibility Report, in reports the progress made in its Women Farmers/ Workers area: 'By 2020, develop programs to help women farmers/workers improve their livelihoods, families and communities using climate-smart agriculture. - Complete and ongoing' [Human Rights Milestones 2020, 2021: filecache.mediaroom.com] & [Corporate Responsibility Report 2019/2020, 2020: crreport.kelloggcompany.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 26.84 out of 80 points scored in themes A-D has been applied to produce a score of 6.71 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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