

Company Name Kraft Heinz
Industry Agricultural Products (Supply Chain only)
Overall Score 13.8 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
4.3	25	B. Embedding Respect and Human Rights Due Diligence
4.0	20	C. Remedies and Grievance Mechanisms
1.5	25	D. Performance: Company Human Rights Practices
1.3	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	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: General HRs commitment: The Company states 'we are committed to respecting human rights in our own operations and throughout our global value chain'. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: The Company states that its Human Rights Policy is 'guided by' the UNGPs. Moreover, according to its Supplier Guiding Principles: 'The Mandatory Requirements and Expected Practices outlined in this Policy are guided by industry best practices and internationally recognized standards, including without limitation, the United Nations Guiding Principles on Business and Human Rights'. However, 'guided by' is not considered a formal statement of commitment according to CHRB wording criteria. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Company has a commitment to the ILO Core: The Company explicitly commits to all ILO Core areas for both itself and its suppliers in its Human Rights Policy. See below. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] Met: Company has a explicit commitment to All four ILO Core: As stated above, the Company adheres to the ILO core labour standards, including commitment against child labour, forced labour, discrimination, freedom of association and

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			<p>collective bargaining. In relation to these last two, it states that 'we recognize and respect the rights to freedom of association and collective bargaining'. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The Company explicitly requires all the ILO Core areas as a suppliers' requirement in the Human Rights Policy. See below. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Met: Company explicitly list All four ILO for suppliers: The Company adheres to and expects its suppliers and other business partners to adhere to the following: 'Minimum Age for Employment [...] We do not tolerate the use of child labor [...] Forced Labor – we do not tolerate the use of forced or involuntary prison labor [...] Discrimination – we prohibit discrimination on the basis of inequalities including race, ethnicity, sex, language, religion, political or other opinion, national or social origin, property and birth or other legally-protected status [...] Freedom of Association – we recognize and respect the rights to freedom of association and collective bargaining'. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.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: As part of its Global Human Rights Policy, the Company states that it adheres to principles of: 'Health and Safety – we require working conditions in compliance with all applicable laws regarding worker health and safety'. This is also expected of suppliers. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: Regarding working hours, the Company indicates that 'we provide fair and equitable wages and other employment conditions in accordance with applicable local laws and/or the principles of this Policy, whichever is higher'. However, no evidence found that the Company commits to respecting ILO labour standards on working hours or that it publicly states that workers shall not be required to work more than 48 hours in a regular work week or 60 hours including overtime. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: See above. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: It indicates that 'Suppliers must comply with all applicable laws and regulations regarding wages, overtime pay, benefits, leave, and maximum working hours. (...) Suppliers will also respect laws with respect to limiting regular and overtime working hours and ensure that overtime work remains voluntary and compensated fairly'. Also: 'When not otherwise dictated by law, suppliers should provide at least one consecutive 24-hour period of rest in each 7-day period. Workers are entitled to reasonable rest periods, annual leave, and holidays with pay'. However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or to respect international standards on working hours. [Supplier Guiding Principles_v.1, 07/2021: kraftheinzcompany.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT: The Human Rights policy states that 'We follow all applicable laws relating to the rights of land and natural resources'. Also, in the Supplier Guiding Principles, it indicates: 'Kraft Heinz is against all forms of land acquisitions that are illegal'. However, no evidence of a commitment to respecting ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT). [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] & [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.com] • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards: As above, the policy indicates that 'We follow all applicable laws relating to the rights of land and natural resources'. However, no commitment to respecting land ownership and natural resources as set out in the IFC Performance Standards found. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: In its Supplier Guiding Principles, the Company indicates: 'Kraft Heinz

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>is against all forms of land acquisitions that are illegal. Suppliers must respect the land rights of women, indigenous people, and local communities impacted by their operations, and suppliers must adhere to the Food and Agriculture Organization of the United Nations' principle of Free, Prior, and Informed Consent in their sourcing practices'. However, no further evidence found that the Company's itself is committed to respecting indigenous peoples' rights or that it references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No.169 or of the UN Declaration on the Rights of Indigenous Peoples.</p> <ul style="list-style-type: none"> • Not Met: Expecting suppliers to make these commitments: See above [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] & [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Respecting the right to water: The policy states that 'we aim to understand and, where relevant, address water access risk, respecting everyone's right to safe, accessible and affordable water as well as to clean sanitation facilities'. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Met: Company's policy commits to obtain FPIC: The Company indicates that 'we adhere to the principle of free, prior and informed consent (FPIC). We follow all applicable laws relating to the rights of land and natural resources'. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] & [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Met: Expecting suppliers to make these commitments : The Company's policy, covering land (FPIC) and water also apply to suppliers: 'Kraft Heinz adheres to the following principles, and expects the same from its suppliers and other business partners'. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights: The Company states it seeks 'to respect human rights across [its] global operations and supply chain, which is represented by hundreds of thousands of stakeholders, including but not limited to [...] rights holders such as the following: foreign and migrant workers, women, children, indigenous populations, minorities and people with disabilities.' However, it is not clear if the company has a commitment to women's rights throughout its operations, as 'seek to respect' is no considered a formal statement of commitment following CHRB wording criteria. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Not Met: Children's rights: See above. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Not Met: Migrant worker's rights: See above. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Not Met: Expects suppliers to respect at least one of these rights: The Company indicates that 'Additional consideration should be given to protect migrant workers (...) against additional vulnerabilities towards human right abuses and exploitation. Suppliers are required to implement or strengthen relevant human resources management systems and policies to address risks to migrant workers. Migrant workers shall not be threatened with denunciation to authorities or withholding of official documents with the intention of coercing them into employment terms or impacting their ability to leave'. Also, 'Suppliers shall not discriminate in hiring, contracting, or employment practices including, without limitation, compensation, promotion, discipline, termination, and retirement. Suppliers will not discriminate based on (...) country of origin'. Moreover, 'Suppliers shall uphold professional, ethical, safe, secure, and responsible recruitment practices with the intention of preventing unnecessary risk exposure, exploitation, and unreasonable financial bonds being imposed on recruits. Kraft Heinz abides by the "The Employer Pays Principle." As such, suppliers must ensure that individual workers and job seekers are not charged for their jobs and that the cost of recruitment should be borne, not by the worker, but by the employer'. However, although the Company indicates it expects suppliers to pay additional consideration to migrant workers, and it addresses different issues that are often faced by migrant workers, it is not clear the Company expects its suppliers to commit to respecting migrant workers' rights. As for child labor, the Company states: 'Suppliers will not directly, or indirectly through its contractors or subcontractors, use child labor, and must have policies in place that prohibit the use of child labor. Supplier will comply with the minimum employment age limit defined by applicable law or by ILO Convention 138, whichever is more restrictive. The ILO Convention 138 minimum employment age is the local mandatory schooling age, but not less than 15 years of age (14 years in certain developing countries), subject to exceptions allowed by the ILO and applicable law (i.e., for light work on family farms that does not interfere with

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			<p>necessary legal education). Children above the minimum age of employment should not be exposed to undue physical risks that can harm physical, mental, or emotional development. No person under the age of 18 shall be employed at night or in hazardous conditions (e.g., through operating heavy machinery or handling hazardous chemicals)'. However, although the Company's supplier Guiding Principles deals with different aspects of child related issues, no request expecting its suppliers to respect children's rights found. Nor is it clear that the Company expects its suppliers to respect women's rights. [Supplier Guiding Principles_V.1, 07/2021: kraftheinzcompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: 'We are committed to addressing any adverse human rights impacts which we have caused or to which we have contributed, and expect our suppliers, business partners and other relevant stakeholders to do the same.' However, this datapoint expects an explicit commitment to 'remedy'. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Not Met: Company expect suppliers to make this commitment: The Human Rights Policy states that 'We are committed to addressing any adverse human rights impacts which we have caused or to which we have contributed, and expect our suppliers, business partners and other relevant stakeholders to do the same'. However, this datapoint expects an explicit commitment to 'remedy'. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact: The supplier guiding principles indicate that 'In the event Kraft Heinz becomes aware of supplier conduct that is not in accordance with the requirements of this Policy, Kraft Heinz will take appropriate action to investigate any reported non-compliance and discuss the findings with the supplier. The supplier shall assist with the investigation and provide access to information requested. Where Kraft Heinz determines remediation is required, the supplier will implement a corrective action plan to promptly correct the non-compliance'. However, although the Company explain its procedure when facing non-compliances, no policy statement found of a commitment to work with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services. [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.com]
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): In regards to use of its Grievance Mechanism, the company states it does 'not tolerate retaliation and anonymity is guaranteed.' However, no commitment to zero attacks on human rights defenders could be found. [Human Rights Policy, 26/09/2019: kraftheinzcompany.com] • Not Met: Company expect suppliers to make this commitment: The Supplier Guiding Principles indicates: 'Suppliers must provide a confidential mechanism for its workers to communicate any workplace grievances, misconduct, or violations of these Principles, or legal or ethical concerns. (...) Suppliers must ensure that retaliation against workers reporting violations in good faith or cooperating in any investigations is prohibited. Suppliers and/or any of the suppliers' employees, contractors, or agents are also encouraged to report: Any potential non-compliance with these Principles, or Any violation or misconduct by any employee, representative or other agent of Kraft Heinz to the Kraft Heinz's Ethics & Compliance Hotline. (...) Kraft Heinz will not tolerate retaliation against any person or supplier reporting potential misconduct in good faith'. Although the Company requires suppliers to ensure that there is no retaliation against workers who reports a potential misconduct, it seems to be limited to the Company's grievance mechanisms. No evidence found that it expects its suppliers to commit to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders beyond its grievance channels. [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.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	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: Board level responsibility for HRs: The Company states that the Board of Directors helps establish and oversee its global ESG objectives and framework, including matters related to operations, its supply chain [...] and social issues. In 2020, the Board of Directors moved primary responsibility for overseeing ESG objectives from the Nominating and Corporate Governance Committee to the Operations and Strategy Committee. Members of the committee reviewed all significant ESG policies, processes and commitments, and received regular updates from the ESG team on progress against key performance indicators and other relevant developments. Human Rights is included. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • Not Met: Describe HR expertise of Board member: The Company's Board of Directors has a diverse skill set that spans areas important to the company. General résumés can be found at the Company's webpage. However, it is not clear the human rights expertise of the board member or board committee tasked with that governance oversight. [Board of Directors (web), N/A: ir.kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
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: As indicated in previous indicator, In 2020, the Board of Directors moved primary responsibility for overseeing ESG objectives to the Operations and Strategy Committee. Members of the committee reviewed all significant ESG policies, processes and commitments, and received regular updates from the ESG team on progress against key performance indicators and other relevant developments. The Committee 'reviews all significant ESG policies, processes and commitments, through at minimum an annual update'. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • Not Met: Examples/trends re HR discussion in the last reporting period: The Company has provided feedback to CHRB regarding this datapoint, but it was not material. <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: The Company indicates that 'we have established ESG-related key performance indicators (KPIs) for our Chief Executive Officer'. The evaluation criteria is: 'Progress on global ESG goals'. The CEO is a Board member. The Company's Environmental Social Governance ("ESG") strategy prioritizes the key ESG issues through three pillars: Healthy Living & Community Support, Environmental Stewardship and Responsible Sourcing. According to the Company, Responsible Sourcing involves: 'Work throughout our value chain dedicated to responsible sourcing and related impacts, including human rights,...'. [2022 Proxy Statement, 25/03/2022: ir.kraftheinzcompany.com] • Not Met: At least one key HR risk, beyond employee H&S: Although the Company indicates that the CEO has ESG-related performance indicators, and responsible sourcing is included, no specific salient issue-related target was found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public: Regarding the CEO remuneration, it indicates that 'Progress on ESG goals' represents 10% of the compensation programme. However, no further details found. [2022 Proxy Statement, 25/03/2022: ir.kraftheinzcompany.com] • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. It also has provided additional comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. CHRB can only accept evidence that is publicly disclosed. • Not Met: Describe frequency and triggers for reviewing

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <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	<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: Regarding Administrative and Governance in the Human Rights Policy, the Company states the following: 'Relevant members of the Kraft Heinz Executive Management team oversee implementation of this Policy. A Global Steering Group – including the Head of Corporate Social Responsibility, the Chief Procurement Officer and the Chief Ethics and Compliance Officer – monitors compliance with this Policy and developments within the industry.' [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility: The Company indicates, in its 2021 ESG Report: 'The ESG Steering Group is comprised of leaders in various functions around the globe. Team leaders are responsible for mobilizing the organization and collaborating across departments to lead the development, implementation, continuous improvement and measurement of relevant ESG policies, procedures and programs. The ESG Steering Group has subcommittees that meet regularly in the following areas: (...) Responsible Sourcing (...)' . Although the 2022 Proxy Statement indicates that responsible sourcing covers human rights impacts, no further description found of how it assigns responsibility for implementing its human rights policy commitment for day-to-day management across relevant departments. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] & [2022 Proxy Statement, 25/03/2022: ir.kraftheinzcompany.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0.5	<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: The senior leaders within the Global Steering Group have performance incentives linked to successful implementation and governance of this [Human Rights] Policy.' The policy goes beyond the ILO core. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.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 states that it has an established, comprehensive approach to Enterprise Risk Management (ERM). Annually, senior management evaluates changes and required updates to the top enterprise risks. The ERM process covers a broad spectrum of risks across several dimensions: strategic, financial, operational, legal & regulatory, human capital, and hazard/catastrophic. Senior management prioritizes the risks and develops the Kraft Heinz risk profile, which is shared with the Audit Committee of the Board of Directors annually. Each risk owner provides regular updates to the Audit Committee of the Board of Directors'. It is not clear, however, how human rights related risks are integrated in the ERM. The Company has provided feedback to CHRB regarding this indicator but the information was already being used. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • 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	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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	commitment(s) to workers and external stakeholders		<ul style="list-style-type: none"> • Met: Communicates its policy to all workers in own operations: The Company states that 'We actively communicate the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement. The Policy is public via the Kraft Heinz Corporate Website and within our internal Kraft Heinz Policy Center, housed on an intranet platform. When needed, local translation is provided'. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: See above. The Company states that it communicates human rights guiding principles to business partners and other stakeholders. However, no reference found to local communities. The Company has provided feedback to CHRB regarding this datapoint, but it was not material as it mentions that the supplier Guiding Principles has been translated into 26 languages and that training is provided to suppliers. The Company is expected to describe how it actively communicates its policy commitments to affected stakeholders, including local communities and other groups. No further evidence found. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] • Not Met: How policy commitments are made accessible to audience: See above. The Company states that 'When needed, local translation is provided'. However, no description of how the policy is communicated to affected or potentially affected stakeholders could be found. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to 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"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain: We actively communicate the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement. The Policy is public via the Kraft Heinz Corporate Website and within our internal Kraft Heinz Policy Center, housed on an intranet platform. When needed, local translation is provided'. However, it is unclear whether this policy is communicated down the supply chain. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to communicate policy requirements • Met: How HR commitments made binding/contractual: The Company states in its Supplier Guiding Principles that 'acceptance of these Principles and commitment to comply with the requirements contained herein is part of any supplier contractual arrangement or purchase order with Kraft Heinz. Particular supplier contracts may contain more specific provisions addressing some of these issues.' The Principles include human rights requirements. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on 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"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2 • Not Met: How workers are trained on HR policy commitments: We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk, including [...] training protocols and the implementation of several global policies'. However, no further details found. Moreover, the Company provides feedback citing the 'Owniversity'. Although it is a 'trusted source for learning for all Employees', as it is mentioned in its 2021 ESG Report, no description was found of a programme to train workers on its human rights commitments. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • Not Met: Trains relevant managers including procurement: The Company 'has further enhanced the rigour and extent of training being provided to its employees, specifically with regard to those in roles that are more readily exposed to scenarios where forced labour may arise. This targeted and pro-active practice furthers Kraft Heinz's commitment to protecting the rights of workers worldwide, meaning we are better poised than ever to identify actual or potential human rights violations in our supply chain. The increased levels of training provided by Kraft Heinz help us manage human rights protection in our business.' However, no further details found, including whether it trains procurement managers on human rights. [Modern Slavery Statement 2020, 19/06/2020: kraftheinzcompany.eu]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2 • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: The Company states that it 'will provide training materials to suppliers on these Principles and other relevant standards'. The Principles refer to Supplier Guiding Principles. 'Kraft Heinz requires that all supplier representatives or account managers working on Kraft Heinz business review these training materials. To support supplier's compliance with this Policy, it is the supplier's responsibility to address Mandatory Requirements and Expected Practices as appropriate. Where a supplier's existing policies and practices meet or exceed the Mandatory Requirements in this Policy, the supplier's training and communications to its workers with respect to its policies and practices may satisfy this requirement'. However, no actual details found on the training it provides to suppliers to help them meet its human rights policy commitment. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company discloses in its Global Human Rights Policy as the following: 'We track the effectiveness of our management of negative human rights impacts through the monitoring of and engagement with our suppliers, business partners and other relevant stakeholders [regarding compliance with the Human Rights Guiding Principles set forth in this Policy].' In its Supplier Guiding Principles. The Company states that 'Kraft Heinz reserves the right to monitor a supplier's compliance with this Policy using supplier self-declarations (i.e., SEDEX for direct suppliers and EcoVadis for indirect suppliers) and certifications, questionnaires, or online assessments, and/or verification through external audits. Supplier authorizes Kraft Heinz and its designated agents (including designated third parties) to engage in monitoring activities per supplier site on an annual basis, including on-site audits with reasonable notice. Kraft Heinz reserves the right to conduct additional audits in order to further investigate potential noncompliance with these Principles, review the implementation of corrective action, or to comply with regulator or other third party inquiries.' However, it is not clear the process by which own operations are actually monitored in human rights compliance. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2 • Not Met: Describes corrective action 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: The Company expects suppliers to comply with its Global Human Rights Policy, and the Supplier Guiding Principles are incorporated into contracts. The Company also states in its Supplier Responsibility Principles that 'Acceptance of these Principles and commitment to comply with the requirements contained herein is part of any supplier contractual arrangement or purchase order with Kraft Heinz. Particular supplier contracts may contain more specific provisions addressing some of these issues.' However, no description of how human rights performance is taken into account to identify and select potential suppliers. The Company is expected to describe how human rights performance is considered when choosing their suppliers, not after the decision was made and then suppliers have to agree to comply with different expectations. The methodology focuses on the selection process. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Met: HR affects on-going supplier relationships: The Company states in its Supplier Responsibility Principles that 'in the event of serious or persistent conduct in violation of this Policy, the conduct of the Supplier will be evaluated on a case-by-case basis. Kraft Heinz reserves the right to terminate any agreement or business relationship with a supplier that fails to meet any of the Mandatory Requirements contained in this Policy'. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company actively communicates 'the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement.' However, no description of how it has identified and engaged with stakeholders or the frequency and triggers for engagement could be found. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders: The Company indicates that 'Kraft Heinz reserves the right to monitor a supplier's compliance with this Policy using supplier self-declarations (i.e., SEDEX for direct suppliers and EcoVadis for indirect suppliers) and certifications, questionnaires, or online assessments, and/or verification through external audits'. However, Company is expected to provide two examples of engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years. SEDEX and EcoVadis are service providers. In its 2021 ESG Report it also discloses a table with different stakeholders, type of engagement and subject area discussed. Although Human Rights issues have been discussed with different stakeholders (investors, NGOs and suppliers), it is not clear if there has been engagements in the last two years with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives). No further evidence found. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] & [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Identifying risks in own operations: The Company states that following the release of the Global Human Rights Policy, Kraft Heinz undertook a global human rights risk assessment with third party assistance. This exercise highlighted relative risk factors by commodity type overlaid with associated geographical risk. The evaluation also included economic and social criteria to determine points in our value chain where risk is highest, and where it could make the greatest impact. No details found, however, in relation to the actual process followed for identifying potential issues. The Company has provided feedback to CHRB regarding this datapoint, but the evidence provided was already in use. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: Regarding its Supply chain human rights risk assessment for the Australian subsidiary (Kraft Heinz Australia), the Company indicates: 'Towards the end of 2020, Kraft Heinz Australia engaged ELEVATE, an industry leader in sustainability and supply chain services globally, to undertake an independent human rights risk assessment of our supply chain, based on risk assessment and segmentation methodology. This approach considered inherent sourcing risks and business leverage insights to determine which segments of our supply chain provide the greatest opportunity to influence change, manage risk and drive impact. (...) Kraft Heinz Australia assessed its top 429 suppliers to the Australian business, across all four of our divisions: packaging, ingredient, indirect services and external manufacturers (co-packers). The risk inputs involved evaluation of the relative risks of exploitation and human rights vulnerabilities involved in producing the products and delivering services within our supply chains. Specific risk characteristics evaluated for each supplier included: Workforce: relating to the nature of the work, required skills; Product: including seasonality, production processes, costs, and value; Business processes: involving labour recruitment issues, transparency, and complexity. Inherent geographic and commodity risks were determined through a blend of public domain datasets (e.g. United Nations, World Bank, Global Slavery Index, ILO) and ELEVATE's country risk scores based on annual audit data to reflect working conditions and human rights non-compliances on the ground'. [Joint Modern Slavery, 29/06/2021: modernslaveryregister.gov.au] Score 2 • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The process is ongoing. In its 2021 Modern Slavery Statement, the Company indicates that 'Our due diligence efforts in 2020 included conducting risk assessments with third-party assistance to identify potential and/or actual negative human rights risks'. Although the Company indicates that it counted with third-party assistance, no further details found, including experts and affected stakeholders consulted. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] & [2021 Modern Slavery Statement, 22/06/2022: heinz.eu] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	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: Describe process for assessment of HR risks and discloses salient HR issues: The Human Rights policy Our efforts include conducting a risk assessment to identify potential and actual negative human rights impacts. This includes evaluation of geographical, economic and social criteria to determine points in our value chain where risk is highest, and where we can make the greatest impact'. See more details in description below, it is not clear if the assessment also included the Company's own operations, as evidence seems to refer to supply chain. The Company has provided feedback to CHRB regarding this datapoint, but the information seemed to be supplier related. This datapoint focuses on the Company own operations. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • Met: How process applies to supply chain: The ESG report indicates that 'The Company states that following the release of the Global Human Rights Policy, Kraft Heinz undertook a global human rights risk assessment with third party assistance. This exercise highlighted relative risk factors by commodity type overlaid with associated geographical risk. The evaluation also included economic and social criteria to determine points in our value chain where risk is highest, and where it could make the greatest impact. The scope of the assessment was all encompassing – rather than only evaluating specific commodities, we assessed nearly all of our ingredient food purchases. This assessment is influencing our plans to continuously develop and improve our due diligence and management programs'. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • Not Met: Public disclosure of the results of HR assessment: The Australian subsidiary of the Kraft Heinz Food Company (Kraft Heinz Australia), discloses its Risk Assessment Results: 'Priority Segment: 7% of our suppliers have been assessed as having the 'Highest Risk' of modern slavery exposure. This is because of their geographies and the nature of products or services we source from them. This is also the segment where Kraft Heinz Australia has a high degree of leverage with the suppliers. Moderate Segment: 17% of Kraft Heinz Australia suppliers, the 'High or Extreme Risk' of modern slavery exposure due to their geographies and product or services categories, and where Kraft Heinz Australia has lower leverage and thus

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>visibility of the supplier practices. Minimum Segment: 61% the largest cohort of Kraft Heinz Australia suppliers, with 'Minimum Risk' of modern slavery practices due to their geographies and product categories, and where Kraft Heinz Australia has relatively low leverage. Specialised Segment: 15%, of Kraft Heinz Australia suppliers, which represent 'Lower Risk' of modern slavery practices due to their geographies and product categories, and where Kraft Heinz Australia has large value of transactions and higher leverage'. However, it is not clear if assessments are extensive to other countries or what is the process (es) that are undertaken to assess the company's human rights risks globally. No evidence found of the Company disclosing salient issues beyond Australian context. [Joint Modern Slavery, 29/06/2021: modernslaveryregister.gov.au]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Action Plans to mitigate risks: The Company states the following: 'We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk'. In the ESG report it indicates that 'In 2020, we began plans of two-prong approach, working collaboratively with our value chain toward proactive capacity building, identifying areas where we can collectively make improvements, as well as targeting specific elevated-risk procurement categories, with enforcement actions if necessary and segmentation based on: type of supplier (Strategic, Core or transactional); risk categories and materiality; and risk levels based on country pairings across procurement units. However, no further details found, including whether it also covers own operations. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • Met: Description of how global system applies to supply chain: As indicated above, the Company has a 'two-prong approach', that includes capacity building and targeting specific elevated-risk procurement categories, with enforcement actions if necessary and segmentation based on: type of supplier (Strategic, Core or transactional); risk categories and materiality; and risk levels based on country pairings across procurement units. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] • Not Met: Example of actions decided on at least 1 salient HR issues: The Company states that it undertook a global human rights risk assessment with third-party assistance considering geographical risk, and economic and social criteria. It assessed nearly all of its ingredient food purchases. And this assessment is influencing its plans to develop and improve due diligence and management programs. However, no example of action was found. In its Joint Modern Slavery Kraft Heinz Australia the Company reports the following: 'The Kraft Heinz Food Company has a set of Global Principles applicable to its supply chain referred to as the Supplier Guiding Principles, (...) All Kraft Heinz Australia suppliers and co-packers are contractually obligated to comply with the Supplier Guiding Principles, and, if requested by Kraft Heinz Australia, must certify their compliance and allow Kraft Heinz Australia to conduct announced and unannounced audits. In 2020, the Supplier Guiding Principles were extended to all new supplier and co-packers. (...) Kraft Heinz Australia requires all employees and related entities, suppliers and business partners to strictly adhere to our human rights standards'. However, no example found of the specific actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations in the last three years. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] & [Joint Modern Slavery, 29/06/2021: modernslaveryregister.gov.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: We track the effectiveness of our management of negative human rights impacts through the monitoring of and engagement with our suppliers, business partners and other relevant stakeholders [regarding compliance with the Human Rights Guiding Principles set forth in this Policy]. We will provide biennial public disclosure on our effectiveness'. However, no further details found. Although the Company indicates

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>on its feedback to CHRB that a system has been put into place through SEDEX and Ecovadis in 2021 and that they will be reporting on it in future years. No further details provided of the system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com]</p> <ul style="list-style-type: none"> • Not Met: Lessons learnt from checking system effectiveness: As stated above, the Company will provide a public disclosure of effectiveness, however, results have yet to be published. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in its Global Human Rights Policy that 'We provide several ways for employees, suppliers, business partners and other stakeholders to raise concerns or complaints. This includes the reporting of potential misconduct to managers, Human Resources professionals, the Legal Department and the Ethics & Compliance team, and our confidential Ethics & Compliance Hotline. The Hotline is open to all stakeholders, including rightsholders, is maintained by a third-party provider and has multilingual staff available 24 hours a day. Reports can be made via country-specific toll-free phone numbers or online.' The hotline website is available in more than 40 different languages. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] & [Compliance hotline on website: app.convercent.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: As above. 'The Hotline has multilingual staff available 24 hours a day. Reports can be made via country-specific toll-free phone numbers or online'. The hotline website is available in more than 40 different languages. However, it is not clear how workers are made aware of it. [Compliance hotline on website: app.convercent.com] & [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company states in its Supplier Guiding Principles that 'Suppliers and/or any of the suppliers' employees, contractors, or agents are also encouraged to report: 1. Any potential non-compliance with these Principles, or 2. Any violation or misconduct by any employee, representative or other agent of Kraft Heinz to the Kraft Heinz's Ethics & Compliance Hotline. The Kraft Heinz Ethics & Compliance Hotline is hosted by an independent third party and is confidential, multi-lingual, and available 24 hours a day. Reports can be made via country-specific, toll-free phone numbers or online via KraftHeinzEthics.com. Kraft Heinz encourages suppliers to communicate the availability of the Ethics and Compliance hotline to their workers. Kraft Heinz will not tolerate retaliation against any person or supplier reporting potential misconduct in good faith.' [Supplier Guiding Principles v1.0, 07/2021: kraftheinzcompany.com] • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company provides a confidential E&C Hotline, which is publicly available to anyone, including our business partners, for reporting an ethics or compliance concern. 'The Hotline is open to all stakeholders, including rightsholders, is maintained by a third-party provider and has multilingual staff available 24 hours a day.' [Kraft Heinz Ethics & Compliance Hotline: app.convercent.com] & [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: It indicates 'the Company provides a confidential E&C Helpline, which is publicly

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>available to anyone, including our business partners, for reporting an ethics or compliance concern. The multi-lingual Helpline is staffed 24 hours a day by an independent third party. Reports can be made via country-specific ,toll-free phone numbers or online'. It is not clear, however, how communities (external stakeholders) are actively made aware of the mechanisms. [Ethics and Compliance (web), N/A: kraftheinzcompany.com]</p> <ul style="list-style-type: none"> • Met: Communities access mechanism direct or through suppliers: The Company has its helpline open to anyone to report. This includes suppliers' external stakeholders. [Helpline (web), N/A: app.convercent.com] • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system: The Company provides feedback on this datapoint. However, no description found of how it engages with potential or actual users on the design and performance of the mechanism(s) (such as on scope, methods of raising grievances, etc). • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism: The Company provides feedback on this datapoint. However, no description found of how it engages with potential or actual users (or individuals or organisations acting on their behalf) on the improvement of the mechanism(s). • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed: The Company indicates, in its feedback, that the procedure to file a complaint is outlined in its webpage and that submitters can check the status of their submission in the same page. However, no further description found of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant. [Helpline (web), N/A: app.convercent.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: As seen above, reports may be escalated to executive leadership when appropriate. However it is not clear how the complaints or concerns may be escalated to independent parties by the complainant to reach a decision. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com]
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company states that 'We do not allow retaliation against anyone who, in good faith, asks questions, reports issues, or assists with an investigation into misconduct. You should report anything you witness that isn't right, even if you think the issue is minor or even if you're not sure. You are protected from retaliation if you report misconduct in good faith, even if it turns out you are mistaken. Anyone who retaliates is subject to disciplinary action, including termination of employment. If you are retaliated against or witness retaliation against anyone else, report it immediately to the Ethics & Compliance Team (ethics@kraftheinz.com) or the Helpline'. [Code of Conduct_v1.0, 07/2021: kraftheinzcompany.com] • Met: Practical measures to prevent retaliation: The Company states in its Code of Conduct that 'you may also report suspected misconduct or ask questions anonymously using the Kraft Heinz Ethics Helpline. The Kraft Heinz Helpline, available at kraftheinzethics.com, is available 24 hours a day, 7 days a week to allow you to report concerns or ask questions, either online or by telephone. The Kraft Heinz Helpline is operated by an independent third party that specializes in confidential and anonymous employee and business partner reporting. When you make a report through the Helpline, a web-based form will be sent to the Kraft Heinz Ethics & Compliance Team to allow a response to your question or concern. You will have the opportunity to set a password that will allow you to check back in for further communication or to check on the status of your issue while still keeping your identity anonymous'. [Code of Conduct_v1.0, 07/2021: kraftheinzcompany.com] & [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Guiding Principles indicates: 'Suppliers must ensure that retaliation against workers reporting violations in good faith or cooperating in any investigations is prohibited'. However, it is not clear the Company expects its suppliers to prohibit retaliation also against other stakeholders (including those that represent them) for raising human rights related concerns. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.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: The Company has provided feedback to CHRB regarding this indicator, but these pieces of evidence were not material. • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company states in its Supplier Guiding Principles that 'suppliers must comply with all applicable laws and regulations regarding wages, overtime pay, benefits, leave, and maximum working hours. Workers should receive fair and equitable pay. Suppliers will also respect laws with respect to limiting regular and overtime working hours and ensure that overtime work remains voluntary and compensated fairly.' However, although the Company indicates that 'Workers should receive fair and equitable pay', it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices): In the feedback provided to CHRB, the Company indicates that Suppliers must comply with our Supplier Guiding Principles and human rights policy in all contracts and in our standard terms and conditions worldwide. However, no description found of the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. • Not Met: Practices adopted to pay suppliers in line with agreed timeframes

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Review own operations to mitigate negative impact Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates that 'At the end of 2020, Kraft Heinz Australia had 4 company-owned factories in Australia and employed just under 500 people across our Australian offices and factories. (...) We also work with external companies (co-packers) to manufacture products for Kraft Heinz Australia under our own brands. At the end of 2020, Kraft Heinz Australia had approximately 72 packaging suppliers, 262 ingredient suppliers, 2500 indirect goods and services suppliers and 60 external manufacturers (co-packers)'. However, this information only refers to Kraft Heinz Australia. It is not clear that the Company as a whole identifies its suppliers, including direct and indirect suppliers. No further evidence found. [Joint Modern Slavery, 29/06/2021: modernslaveryregister.gov.au] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The Company states in its Supplier Guiding Principles that 'suppliers will not directly, or indirectly through its contractors or subcontractors, use child labor, and must have policies in place that prohibit the use of child labor. Supplier will comply with the minimum employment age limit defined by applicable law or by ILO Convention 138, whichever is more restrictive. The ILO Convention 138 minimum employment age is the local mandatory schooling age, but not less than 15 years of age (14 years in certain developing countries), subject to exceptions allowed by the ILO and applicable law (i.e., for light work on family farms that does not interfere with necessary legal education). Children above the minimum age of employment should not be exposed to undue physical risks that can harm physical, mental, or emotional development. No person under the age of 18 shall be employed at night or in hazardous conditions (e.g., through operating heavy machinery or handling hazardous chemicals).' However, it is not clear suppliers are requested to verify verifying the age of workers recruited, and to have remediation programmes. The Company has provided some feedback to CHRB but it was already in use. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: How working with suppliers on child labour Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Debt and fees rules in codes or contracts: In its Supplier Guiding Principles, the Company states: 'Suppliers shall uphold professional, ethical, safe, secure, and responsible recruitment practices with the intention of preventing unnecessary risk exposure, exploitation, and unreasonable financial bonds being imposed on recruits. Kraft Heinz abides by the "The Employer Pays Principle." As such, suppliers must ensure that individual workers and job seekers are not charged for their jobs and that the cost of recruitment should be borne, not by the worker, but by the employer'. However, although the Company indicates that its suppliers cannot impose financial burdens on job seekers, it makes no reference to third-party recruitment intermediaries. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<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 states in its Supplier Guiding Principles that 'suppliers must comply with all applicable laws and regulations regarding wages, overtime pay, benefits, leave, and maximum working hours. Workers should receive fair and equitable pay. Suppliers will also respect laws with respect to limiting regular and overtime working hours and ensure that overtime work remains voluntary and compensated fairly'. However, it has not mentioned paying in full and on time. [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: In its Supplier Guiding Principles, the Company states: 'Migrant workers shall not be threatened with denunciation to authorities or withholding of official documents with the intention of coercing them into employment terms or impacting their ability to leave. (...) Kraft Heinz prohibits the use of all forms of forced, bonded, indentured, or compulsory labor, including prison labor, indentured labor, bonded labor, military labor, slave labor or any form of human trafficking. All workers must work under voluntary conditions and with the freedom to terminate their employment at any time'. [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.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 [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com]
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 Company states in its Supplier Guiding Principles that 'suppliers shall recognize and respect each worker's freedom of association and rights to engage in collective bargaining. Suppliers must respect these rights by maintaining a professional environment free from fear of reprisal, intimidation, or harassment'. [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.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 states in its Supplier Guiding Principles that 'Suppliers shall comply with all applicable laws and regulations regarding worker health and safety and assign responsibility for health and safety conditions to a senior management representative'. It set out four health and safety standards at a minimum, which includes 'the workplace should not be harmful to health and safety and should be free of recognized hazards'. There are other requirements related to accommodation, training, chemicals and protective equipment. [Supplier Guiding Principles_v1.0, 07/2021: kraftheinzcompany.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • 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"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human Rights Policy September 2019, 26/9/2019: kraftheinzcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on land & owners in codes or contracts: The Company states in its Supplier Guiding Principles that 'Kraft Heinz is against all forms of land acquisitions that are illegal. Suppliers must respect the land rights of women, indigenous people, and local communities impacted by their operations, and suppliers must adhere to the Food and Agriculture Organization of the United Nations' principle of Free, Prior, and Informed Consent in their sourcing practices. Suppliers shall not engage in any form of land grabbing. Kraft Heinz expects all suppliers to adhere to laws and regulations relating to land use rights, including without limitation, having proper land use permits in place (e.g., for farming, manufacturing or any other industrial use) and having permission for the use of ground water or other water sources, such as nearby rivers or lakes.' However, although the Company has clear provisions on land rights, including the stipulation of having the FPIC, no further evidence found that the Company explicitly requires suppliers to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, with particular attention to vulnerable or marginalised tenure rights holders, and to negotiate with them to provide adequate compensation or requested alternatives to financial compensation. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.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	<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 Supplier Guiding Principles that it expects all suppliers to 'adhere to laws and regulations relating to land use rights, including without limitation, having proper land use permits in place (e.g., for farming, manufacturing or any other industrial use) and having permission for the use of ground water or other water sources, such as nearby rivers or lakes'. Also, regarding its waste management it requests suppliers to: 'Not dump waste into any bodies of water, i.e. rivers, lakes, ground water or ocean - except for treated waste, as per applicable laws and regulations and any applicable permit; Untreated sewage and wash water should not be dumped into ground or underground bodies of water'. However, although the Company requests suppliers to search for permissions for the use of water and has some regulation that addresses some of the impacts of waste management on the bodies of water, no further water and sanitation requirement found that included refraining from negatively affecting access to safe water in a broader sense, in its contractual arrangements with its suppliers or in its supplier code of conduct. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: How working with suppliers on water stewardship issues: In its 2021 ESG Report the Company discloses different water management projects it carries out. However, they seem to be projects performed on its own facilities, rather than on their supply chain. Moreover, the Sustainable Agricultural Practices Manual indicates a series of procedures suppliers should follow in order to improve their water management system. However, no description found of how it works with suppliers to improve their practices in relation to access to water and sanitation. [2021 ESG Report, 31/12/2020: kraftheinzcompany.com] & [Sustainable Agricultural Practices Manual, 07/2021: kraftheinzcompany.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (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: Women's rights in codes or contracts: In its Supplier Guiding Principles, the Company indicates: 'Suppliers shall not discriminate in hiring, contracting, or employment practices including, without limitation, compensation, promotion, discipline, termination, and retirement. Suppliers will not discriminate based on (...) gender, (...) pregnancy, (...). Nor will suppliers discriminate based on any other condition or characteristic that is protected by applicable law or regulation'. However, although the Company has non-discrimination provisions, no supplier requirement found to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. [Supplier Guiding Principles _v1.0, 07/2021: kraftheinzcompany.com] • Not Met: How working with suppliers on women's rights <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		<ul style="list-style-type: none"> • Area: Forced labour; discrimination • Headline: Supply chains of Kraft Heinz and others criticized for forced labor and discrimination linked to China's political assimilation ethnic Uyghurs and Muslims • Story: 16 May 2019, An investigation by the Wall Street Journal (WSJ) has identified forced labour in supply chains linked to major western brands, including apparel and food manufacturers. The article cites interviews with a number of workers of Uyghur ethnicity, who have been 'recruited' from their villages and forced to work in factories as part of the Chinese government's 're-education' program focused in the Xinjiang region, which many NGO and human rights groups have criticised as amounting to situations of discrimination and coercion. <p>In early 2017, the Communist Party began a new incarceration campaign, rounding up, detaining and forcibly indoctrinating Uyghurs and other Muslim minority ethnic groups in the far-western region. Islam has effectively been outlawed in the far-western region, with people routinely labelled as extremists and imprisoned for practising their religion. A UN committee describes the province as resembling a "mass internment camp", with estimates more than 1 million Uyghurs have been sent to prison or re-education camps The article observes a number of factories in Xinjiang make yarn, which is then sent to other factories in China and countries including Bangladesh and Cambodia to produce clothing products. Additionally, Uyghur workers are also recruited to work in food processing factories, which supply products to major western food brands. The article cites another source saying "executives of Cofco Tunhe Co. visited Aksu's Aketuohai village to recruit villagers to their factory to help the government's poverty-alleviation push. The state-run company is China's largest tomato processor, with Xinjiang as its main production base, supplying tomato paste to Kraft Heinz and Campbell Soup...". In response to enquiries from the WSJ, Kraft Heinz said 5% of its tomato supply came from Xinjiang, with none sold in the U.S. [Wall Street Journal, 16/05/2019, "Western Companies Get Tangled in China's Muslim Clampdown": wsj.com]</p>
E(1).1	The company has responded publicly to the allegation	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: Public response: The company provided a response to the Wall Street Journal where it said that 5% of its tomato supply came from Xinjiang, with none sold in the U.S. It did not address the issue of forced labour in the region. [Wall Street Journal, 16/05/2019: wsj.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The response does not address the allegation. [Wall Street Journal, 16/05/2019: wsj.com]
E(1).2	The company has investigated and taken	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: Engaged with stakeholders: There is no publicly available information that indicates the company has investigated the causes for the rights violations or engaged with affected stakeholders.

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<ul style="list-style-type: none"> • Not Met: Identified cause: There is no publicly available information that indicates the company has investigated the causes for the rights violations or engaged with affected stakeholders. Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Discrimination <p>• Headline: Kraft Heinz sued by former employees over alleged racism at a plant in Tulare, California</p> <p>• Story: On August 20, 2021, media sources reported that three black former employees at Kraft Heinz have filed a lawsuit against the Company, over alleged routine racist harassment from former co-workers and supervisors. The former employees sought nominal, compensatory and punitive damages in excess of USD 30 million.</p> <p>The plaintiffs claimed they were subjected to "a pattern of harassing and discriminatory behaviour based upon their race" over the course of several years along with other Black employees who worked with them at a dairy facility run by Kraft Heinz Foods. The lawsuit said that Kraft Heinz's dairy plant in Tulare, California, was "rife with anti-Black slurs, innuendos, threats, and discrimination."</p> <p>The lawsuit added that the anti-Black abuse came from peers and supervisors, who controlled whether plaintiffs would receive promotions, transfers, and raises. It said swastikas were drawn on multiple Black employees' lockers, and that non-Black employees used the N-word and racist stereotypes in conversation.</p> <p>The complaint further alleged that the former employees repeatedly confronted managers about both the racist incidents and denials of promotion, but that managers told them to "keep their heads down or else they could join the unemployment line." Kraft Heinz responded with "apathy and inaction" to the hostile work environment, the lawsuit said.</p> <p>The plaintiffs added that they were retaliated against, and that the racist behaviour continued the entire time they worked at the Company, between 2012 and 2018.</p> <p>According to the lawsuit all three men received death threats, which compelled one employee to quit his job in May 2018 after serving 22 years at the Company. The two others, who began working at the plant in 2011, were fired in 2019 for "pretextual grounds" the complaint stated.</p> <p>One manager allegedly told one of the employees that Kraft Heinz's corporate office had instructed management at the dairy plant not to investigate the death threats found in lockers in case it disgruntled other employees, the lawsuit claimed.</p> <p>[Food Business News, 23/08/2021, "Kraft Heinz faces lawsuit over alleged racism at dairy plant": foodbusinessnews.net] [Business Insider, 20/08/2021, "3 Black former Kraft Heinz workers faced racist abuse and threats, and managers told them to 'keep their heads down or else they could join the unemployment line,' a \$30 million lawsuit says": businessinsider.com] [CNN Business, 20/08/2020, "Black former Kraft Heinz employees say coworkers threatened to kill them if they didn't quit": edition.cnn.com]</p>
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response: In its response, Kraft Heinz did not directly address the accusations but emphasized that the alleged incidents all occurred before 2019. "For context, the claims filed within the complaint date back to incidents that are several years old, with the last being in 2018, so to frame this as a current, ongoing

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>or rampant issue is inaccurate," the spokesperson said. "Since then, there have been no other allegations of racial discrimination or harassment at the Tulare plant". [Food Business News, 23/08/2021: foodbusinessnews.net]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The response does not address the individual aspects of the allegation. [Food Business News, 23/08/2021: foodbusinessnews.net]
E(2).2	The Company has appropriate policies in place	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: Engaged with stakeholders: A Kraft Heinz spokesperson said the allegations at the Tulare plant are several years old and were investigated as soon as the company was made aware of them. "We undertook an extensive investigation, including cooperating with law enforcement, to ensure that any behavior that violated our policies, if uncovered, was put to an end," the company said in an emailed statement. "Whenever a serious allegation such as this is made, we take immediate and swift action, including conducting a thorough investigation and implementing corrective actions if behaviors contradictory to our values are found." However, there is no information available that suggests the company engaged with the affected stakeholders. • Not Met: Identified cause: A Kraft Heinz spokesperson said the allegations at the Tulare plant are several years old and were investigated as soon as the company was made aware of them. "We undertook an extensive investigation, including cooperating with law enforcement, to ensure that any behavior that violated our policies, if uncovered, was put to an end," the company said in an emailed statement. "Whenever a serious allegation such as this is made, we take immediate and swift action, including conducting a thorough investigation and implementing corrective actions if behaviors contradictory to our values are found." However, the company declined to disclose the results of the investigation, citing an ongoing legal matter. [CNN Business, 20/08/2020: edition.cnn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(2).3	The Company has taken appropriate action	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: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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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