

## KnowTheChain 2023 Food & Beverage Benchmark

### Additional Disclosure

Company Name: Kellogg Co.

Date:

Guidance:

- Please add any additional information you wish to provide under the relevant indicator elements below.
- We welcome examples of leading practices.
- Unless you are sharing leading practices, please limit the information to indicators for which KnowTheChain could not yet identify sufficient information on your website.
- Note **KnowTheChain has already undertaken a review of your website**. Should you wish to include links to existing disclosure, please specify the page number / section you are referring to.

#### INDICATOR 1: SUPPLIER CODE OF CONDUCT AND CAPACITY BUILDING

1.1 has a supplier code of conduct that requires suppliers to respect the ILO core labour standards, which include the elimination of forced labour; and requires suppliers to cascade/implement standards that are in line with the company's supplier code of conduct; and

1.2 engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building.

#### INDICATOR 2: MANAGEMENT AND ACCOUNTABILITY

2.1 has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labour; and discloses how incentives for staff (e.g. bonuses, part of employee performance reviews) are tied to improvements in working conditions in supply chains;

2.2 discloses how it trains relevant decision-makers within the company on risks and policies that address forced labour; and

2.3 has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.

### INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY

#### 3.1 the names and addresses of first-tier suppliers;

- Per comment in excel, the names of all of T1 palm suppliers can be found on pg 9
  - <https://betterdays.kelloggcompany.com/esg-a-to-z#palm-oil-global-policy>

#### 3.2 the names and locations of below-first-tier suppliers (this does not include raw material suppliers); and

#### 3.3 the sourcing countries of at least three raw materials at high risk of forced labour.

- Kellogg's publicly available CDP Forest annual survey lists all of the sourcing countries identified for palm, cocoa, soy, and timber-based packaging.

### INDICATOR 4: RISK ASSESSMENT

#### 4.1 details on how it conducts human rights supply chain risk or impact assessments that include forced labour risks or assessments that focus specifically on forced labour risks, including through engaging with relevant stakeholders (such as civil society, unions, and workers or their representatives) in countries in which its suppliers operate;

#### 4.2 details on forced labour risks identified in different tiers of its supply chains; and

#### 4.3 how it has consulted with relevant stakeholders (such as civil society, unions, and workers or their representatives) in steps taken to address the risks identified.

- Kellogg is an active member of several human rights focused industry groups, participating in workgroups, and leading some including the Responsible Recruitment Work Group in AIM-Progress. Through these we actively collaborate with peers, civil society, and unions. Since human rights issues are not specific to Kellogg alone, we use these platforms to consult and co-create processes in pursuit of common goals. These are brought back to the company, through its participating representative, to be shared and incorporated into company policy and practice.
  - <https://betterdays.kelloggcompany.com/esg-a-to-z#human-rights-policy> pg 20

### INDICATOR 5: DATA ON SUPPLY CHAIN RISKS

#### 5.1 the percentage or number of supply chain workers who are women;

5.2 the percentage or number of supply chain workers who are migrant workers' and

5.3 the percentage or number of supply chain workers that are being paid a living wage.

#### INDICATOR 6: PURCHASING PRACTICES

6.1 commits to responsible buying practices in its contracts with suppliers;

6.2 describes how it has adopted responsible purchasing practices in the first tier of its supply chains, which includes planning and forecasting, and how it ring-fences labour costs; and

6.3 discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labour.

#### INDICATOR 7: RECRUITMENT-RELATED FEES

7.1 requires that no worker in its supply chains should pay for a job—the costs of recruitment-related fees should be borne not by the worker but by the employer ("Employer Pays Principle");

7.2 provides detail on the implementation of the Employer Pays Principle in its supply chains by demonstrating how it works to prevent the charging of fees to supply chain workers in different supply chain contexts; and

7.3 in the event that it discovers that fees have been paid by workers in its supply chains, provides evidence of re-payment of recruitment-related fees to workers. The company describes how it engages with affected workers in the remediation process.

#### INDICATOR 8: RESPONSIBLE RECRUITMENT

8.1 discloses information on the recruitment agencies used by its suppliers; and

8.2 provides details of how it supports responsible recruitment in its supply chains (e.g. by collaborating with relevant stakeholders to engage policy makers to strengthen recruitment standards).

- See pgs 12 – 13, 17 – 19
  - <https://betterdays.kelloggcompany.com/esg-a-to-z#human-rights-policy>

#### INDICATOR 9: FREEDOM OF ASSOCIATION

9.1 works with independent local or global trade unions and/or other legitimate worker representatives to improve freedom of association in its supply chains;

9.2 discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labour rights agreement with trade unions or worker organisations; and

9.3 discloses the percentage of supply chains covered by collective bargaining agreements.

#### INDICATOR 10: GRIEVANCE MECHANISM

10.1 takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labour conditions in the company's supply chains is available to its suppliers' workers and their legitimate representatives across supply chain tiers; and

- The Kellogg Ethics Alertline can be accessed through the below site.
  - <http://www.tnwgrc.com/kellogg/>
- It is also linked through other Kellogg Co. site pages such as Kellogg's Better Days
  - <https://betterdays.kelloggcompany.com/operating-ethically>

10.2 discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved; and

10.3 takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism.

#### INDICATOR 11: MONITORING

11.1 its methodology for monitoring the implementation of its supply chain policies addressing forced labour;

- Kellogg works with ELEVATE for high-risk T1 supplier site monitoring and assessment through worker voice. Results of the first round of the program are available at the below link
  - [https://betterdays.kelloggcompany.com/image/KelloggCompany2020MilestonesHumanRights\\_11.21.pdf](https://betterdays.kelloggcompany.com/image/KelloggCompany2020MilestonesHumanRights_11.21.pdf) pgs 12-17

11.2 the findings of monitoring reports, including details regarding any violations revealed in relation to forced labour and indicators of forced labour, across supply chain tiers; and

- Kellogg works with ELEVATE for high-risk T1 supplier site monitoring and assessment through worker voice. Results of the first round of the program are available at the below link
  - [https://betterdays.kelloggcompany.com/image/KelloggCompany2020MilestonesHumanRights\\_11.21.pdf](https://betterdays.kelloggcompany.com/image/KelloggCompany2020MilestonesHumanRights_11.21.pdf) pgs 12-17

11.3 the use of worker-driven monitoring (i.e., monitoring undertaken by independent organisations that includes worker participation and is guided by workers' rights and priorities).

- Kellogg works with ELEVATE for high-risk T1 supplier site monitoring and assessment through worker voice. Results of the first round of the program are available at the below link
  - [https://betterdays.kelloggcompany.com/image/KelloggCompany2020MilestonesHumanRights\\_11.21.pdf](https://betterdays.kelloggcompany.com/image/KelloggCompany2020MilestonesHumanRights_11.21.pdf) pgs 12-17

#### INDICATOR 12: REMEDY AND RESPONSE TO ALLEGATIONS

A(1) a process for responding to potential complaints and/or reported violations of policies that address forced labour and how it engages affected stakeholders as part of this process; and

- Per comments in column F of the initial research excel, the grievance procedure outlined in the Global Palm Policy does also apply to grievances raised in relation to other commodity supply chains. However, this has not been explicitly stated in a public document.

A(2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers' workers.

In addition, where an allegation is identified in a company's supply chains:

B.1.1 that it engages in a dialogue with the stakeholders reportedly affected in the allegation(s)

B.1.2 outcomes of the remedy process in the case of the allegation(s); and

B.1.3 evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

Where an allegation is identified in the company's supply chains, but is denied by the company:

B.2.1 a description of what actions it would take to prevent and remediate the alleged impacts; and

B.2.2 as part of this process, it would engage with affected stakeholders and their representatives.

## Reporting Legislations

UK Modern Slavery Act: Where applicable, the company discloses at least one statement under the UK Modern Slavery Act.

**Yes/No.** Please provide link to a publicly available statement.

- The annual Human Rights Milestones reports satisfy the requirements for both the UK Modern Slavery Act and the California Transparency in Supply Chains Act
- The reports are available through links on various pages and the link to most recent report can also be found on the Kellogg Better Days landing page at the bottom:
  - <https://betterdays.kelloggcompany.com/>

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California Transparency in Supply Chains Act: Where applicable, the company has a disclosure under the California Transparency in Supply Chains Act.

**Yes/No.** Please provide link to a publicly available statement.

- The annual Human Rights Milestones reports satisfy the requirements for both the UK Modern Slavery Act and the California Transparency in Supply Chains Act
- The reports are available through links on various pages and the link to most recent report can also be found on the Kellogg Better Days landing page at the bottom:
  - <https://betterdays.kelloggcompany.com/>

Australia Modern Slavery Act: Where applicable, the company discloses at least one statement under the Australia Modern Slavery Act.

**Yes/No.** Please provide link to a publicly available statement.

## High Risk Sourcing

*Please indicate whether your company sources any of the below high-risk commodities. Note where a company does not provide this information, KnowTheChain will review the company's website as well as third party sources to identify relevant information.*

- Beans (green, soy, yellow)
- Brazil Nuts/Chestnuts
- Cattle
- Chile Peppers
- Cocoa
- Coffee
- Corn
- Fish
- Oil (palm)
- Peanuts

- Rice
- Sesame
- Shrimp
- Sugarcane
- Tomatoes
- Wheat