

Kellogg Co.

TICKER:
NYSE: K

MARKET CAPITALIZATION:
US\$ 22 billion

HEADQUARTERS:
United States

7 OUT OF 20
Company's Overall Ranking

32 OUT OF 100
Company's Overall Score

Kellogg Co. (Kellogg) provides average disclosure on its approach to addressing human trafficking and forced labor risks in its supply chain, ranking seventh on the benchmark overall. The company's benchmark performance is driven by its performance in the areas of commitment and governance and purchasing practices. Kellogg has an opportunity to improve its performance in the areas of risk assessment, recruitment, and remedy.

THEME LEVEL SCORE

Commitment and Governance	57 out of 100
Traceability and Risk Assessment	38 out of 100
Purchasing Practices	56 out of 100
Recruitment	0 out of 100
Worker Voice	33 out of 100
Monitoring	25 out of 100
Remedy	13 out of 100

LEADING PRACTICES

None.

NOTABLE FINDINGS

Commitment & Governance
Kellogg discloses a strong commitment to addressing forced labor in several policy documents. Most notably, it states in its Policy Statement Prohibiting Involuntary Labor, which is signed by the Chairman and Chief Executive Officer, that it “prohibits involuntary labor, including forced, indentured, bonded, slave or human-trafficked labor within our business operations and our supply chain.” This is reinforced in its Code of Ethics and in its Global Supplier Code of Conduct. Kellogg ensures that its internal employees are trained on forced labor risks using an online, interactive training module and has also conducted forced labor specific training for its procurement leaders.

Traceability
Kellogg has set the target that by 2020, corn, wheat, rice, potatoes, sugar beets, sugar cane, cocoa, palm oil, fruits (including strawberries and raisins/sultanas), and vanilla will be responsibly sourced using a combination of certification and documented continuous improvement. Further, the company discloses its top five palm oil suppliers, which represent 90% of its palm oil purchases globally.



Purchasing Practices

Kellogg discloses that its supplier selection process takes into consideration the requirements of its Global Supplier Code of Conduct, which addresses forced labor. The company integrates its supplier standards into its supplier agreements and ensures that these standards are cascaded down its supply chain by requiring that suppliers ensure that their own supply chains comply with Kellogg's Global Supplier Code of Conduct.

OPPORTUNITIES FOR IMPROVEMENT

Risk Assessment

Kellogg may also consider developing and disclosing a process through which it identifies forced labor risks in its supply chain associated with specific commodities, regions and/or groups, as well as the outcomes of such a process.

Recruitment

Kellogg is encouraged to disclose evidence of a policy requiring recruitment agencies in its supply chain to uphold workers' rights and to require its suppliers to disclose to them the recruiters that they use. In addition, the company may consider developing and disclosing a policy that prohibits the use of recruitment fees in its supply chain and disclosing evidence of how it ensures such fees are reimbursed should they occur. Kellogg may also consider auditing recruiters in its supply chain to assess the risks of forced labor and human trafficking.

Remedy

Kellogg may consider implementing a remedy program for workers in its supply chain whose rights have been violated and disclosing the outcomes of such a process. The company is also encouraged to enhance the transparency of its process for ensuring suppliers implement corrective actions when they are found to be non-compliant with the company's supply chain standards.

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Provided links.](#)

