

**Corporate Human Rights Benchmark  
2019 Company Scoresheet**

**Company Name** General Mills  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 27.8 out of 100

Theme Score	Out of	For Theme
3.9	10	A. Governance and Policies
6.4	25	B. Embedding Respect and Human Rights Due Diligence
3.3	15	C. Remedies and Grievance Mechanisms
4.5	20	D. Performance: Company Human Rights Practices
5.6	20	E. Performance: Responses to Serious Allegations
4.2	10	F. Transparency

(\*) 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 2019 Methodology document. 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"> <li>Met: General HRs commitment: As indicated in the human rights policy: 'We respect and acknowledge internationally recognized human rights principles. Within our Company and throughout our supply chain, we are committed to treating people with dignity and respect'. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs: The Company states in its human rights policy that 'to inform our approach to human rights, we look to: The United Nations Guiding Principles on Business and Human Rights'. However, this does not count as a formal commitment to these principles according to CHRB wording criteria. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: ILO Core: The Company's Human Rights Policy commits to each ILO core area: ' Consistent with the principles set forth in our Employee Code of Conduct and Supplier Code of Conduct, we: Prohibit forced labor, child labor, and discrimination. [...] Respect the principles of freedom of association and collective bargaining.' [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>Met: Explicitly list All four ILO for AG suppliers: The supplier code of conduct contains an explicit commitment to each ILO core area. With respect freedom of association and collective bargaining, the Company indicates: 'You will recognize</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and respect the rights of employees to freedom of association and collective bargaining.' [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy commits to each ILO core area: ' Consistent with the principles set forth in our Employee Code of Conduct and Supplier Code of Conduct, we: Prohibit forced labor, child labor, and discrimination. [...] Respect the principles of freedom of association and collective bargaining.' [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company indicates that 'globally, (it) is committed to providing workplaces that are among the safest production facilities in the world for all our union and non-union production employees. In addition, we (...) offer competitive rewards; and implement clear health and safety practices'. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The supplier code of conduct contains an explicit commitment to health and safety including different guidelines to follow. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul>
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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"> <li>• Not met: Respect land ownership and natural resources: However, whilst it does not commit to adhering to the principles of FPIC, it has indicated in its policy on human rights, that it 'recognises the importance of land rights as well as the principle of free, prior and informed consent (FPIC)' in the context of palm oil. No further information found in the updated Palm Oil Statement. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a> &amp; Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com/Mills%202019%5Cdisclosure%20GM%202019%5CGeneral%20Mills%20Notes.docx#_Hlk14089609_1,1666,1728,4094,Default,generalmills.com">https://generalmills.com/Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609_1,1666,1728,4094,Default,generalmills.com</a>]</li> <li>• Met: Respecting the right to water: The Company is signatory to the CEO water mandate and its water policy states that it respects 'safe and clean drinking water and sanitation as a human right that is essential for the full enjoyment of life and all human rights'. [Water policy on website: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Met: Expecting suppliers to respect these rights: The Water policy states that 'water stewardship is an integral part of our effort to continually reduce the environmental impact of our operations, including the impact that occurs upstream of our own facilities'. Supplier engagement includes setting 'clear expectations that our suppliers provide a safe and healthy work environment including safe water for drinking and hygiene and they comply with all applicable environmental laws'. [Water policy on website: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC Performance Standards</li> <li>• Not met: FPIC for all: Although, as noted above, it has indicated in its policy on human rights, that it 'recognises the importance of land rights as well as the principle of free, prior and informed consent (FPIC)' in the context of palm oil. Moreover, the Company indicates that it supports "implementation of FPIC by national authorities". However, the FPIC has to be from indigenous peoples and local communities for transaction involving land. No further information found. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a> &amp; Palm oil sourcing statement, 22/03/2019: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Met: Respecting the right to water: See above</li> <li>• Not met: Expecting suppliers to respect these rights: Commitment found only in relation to water. [Water policy on website: <a href="http://generalmills.com">generalmills.com</a> &amp; Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul>
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people's 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"> <li>• Met: Women's rights: The company indicates that 'for decades, General Mills' commitment to empowering women and girls has been a key pillar of our company mission of Nourishing Lives (...) we recently signed on to the United Nations Women's Empowerment Principles'. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a> &amp; Our commitment to empowering women, 22/03/2019: <a href="http://blog.generalmills.com">blog.generalmills.com</a>]</li> <li>• Not met: Children's rights: The company indicates that "prohibit forced labor, child labor, and discrimination". However, no evidence of a publicly available statement to respecting the rights of children found. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: Migrant worker's rights: In its supplier Code, the company indicates that "we expect all of our suppliers to engage in responsible supply chain practices and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to comply with our Supplier Code of Conduct and the four pillars of responsible sourcing: Human Rights, Health and Safety, Environment and Business Integrity". However, no commitment to explicitly respect women's rights or children's rights or migrant workers' rights found. Moreover, in the same Code, the company states that "you will not employ children less than 15 years of age, or 14 years of age where local law allows. Young employees under the age of 18 will not work at night, in hazardous conditions or in work that interferes with schooling". However, no evidence of a publicly available statement to respecting the rights of children found. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Expects suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: The company indicates that 'for decades, General Mills' commitment to empowering women and girls has been a key pillar of our company mission of Nourishing Lives (...) we recently signed on to the United Nations Women's Empowerment Principles'. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a> &amp; Our commitment to empowering women, 22/03/2019: <a href="http://blog.generalmills.com">blog.generalmills.com</a>]</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company indicates the following in its human rights policy: 'We recognize that we are part of a broader community wherever we operate. In the communities where we operate, we believe that engaging stakeholders - including those from more at-risk populations - is fundamental to our respect for human rights. Where practical, we are committed to dialogue and engagement with all relevant parties in an effort to understand, assess and address areas of concern as appropriate'. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	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"> <li>• Not met: Commits to remedy: The Company states in its human rights policy that 'as part of our commitment to respect human rights, we have established internal and external mechanisms to help identify, address and mitigate potential adverse human rights impacts that may be caused by our actions'. However, no formal commitment found to 'remedy'. Also, the 'Palm oil sourcing statement' (and the responsibility report) indicates that suppliers, in cases where there is verified non-compliance with our policy, or where there is continued failure to remediate verified non-compliances in a timely manner, we take steps to remove those producers from our supply chain'. Moreover, the company indicates, in its Slavery and Human Trafficking Statement, that 'our facilities, co-packers and suppliers are held accountable for the results of our responsible sourcing audits by our responsible sourcing managers, contract managers and our third-party audit partners. Our policy is to address all instances of noncompliance with company standards found during audits in a corrective action plan with supporting documentation of the actions taken. If a facility fails to make progress against a corrective action plan, they are subject to review and sanctions, including potential termination. We have terminated relationships with suppliers for issues such as unresponsiveness or repeated audit findings'. However, no evidence found of a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. No further information found in the Palm Oil Sourcing Statement 2019. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a> &amp; Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609_1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human	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"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates that 'no reprisal or retaliatory action will be taken against anyone for raising legitimate concerns. We are committed to investigating and responding to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	rights defenders		such concerns in a prompt and responsible manner'. However, there must be a commitment concerning human rights defenders specifically, or against anyone who opposes the Company due to human rights. No evidence found. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments: In its Supplier Code of Conduct, the company indicates that 'you will prohibit unlawful retaliation against employees who report a compliance or ethical issue learned during the course of work performed for General Mills, or who cooperate in good faith with the investigation of a complaint'. No evidence found of that the company expects its suppliers to commit to neither tolerate nor contribute to threats, intimidation and attacks against human rights defenders in specific. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul>

### A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The policy on human rights, which can be found in the news section of the Company's website, is not signed at board level. However, the 'Slavery and human trafficking statement' contains a general human rights statement, an specific commitment on forced labour, child labour and discrimination and a reference to the human rights policy which, together with the codes 'set the standards for our company, suppliers and partners regarding the protection of human rights'. This policy is signed by the CEO &amp; Chairman. [Slavery and human trafficking statement, 02/2018: <a href="http://generalmills.com">generalmills.com</a> &amp; Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Met: Board level responsibility for HRs: However, the Company has indicated in its policy on human rights that 'the Public Responsibility Committee of the Board of Directors oversees our work in this area. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: The Human Rights policy states that 'The Public Responsibility Committee of the Board oversees our work in this area'. This committee meets three times annually. 'Annually reviews the company's efforts to address risks of forced labor in our supply chain, approving a statement which is signed by the CEO and shared publicly on our website. The Committee also reviews numerous third-party surveys, reports and rankings on the Company's corporate responsibility performance'. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a> &amp; Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Examples or trends re HR discussion: The modern slavery statement indicates that was reviewed by the board. However, no evidence found of specific topics discussed in last reporting year (although the policy statement indicates its duties, this looks for specific work effectively carried out last reporting year). [Slavery and human trafficking statement, 02/2018: <a href="http://generalmills.com">generalmills.com</a> &amp; Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member: No incentives to board members related to human rights were found. [Proxy Statement 2018, 2018: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## 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	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"> <li>• Met: Commits to ILO core conventions</li> <li>• Met: Senior responsibility for HR: The Human rights policy states that ‘the Public Responsibility Committee of the Board of Directors oversees our work in this area. Operational accountability rests with the head of Global Supply Chain, supported by members of the Global Executive Team including the Chief Executive Officer as well as the heads of Global Legal, External Relations and Human Resources’. [Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: In relation to ‘labor practices’ governance, the Responsibility report states that ‘at an operational level, the Human Resources organization leads key employee initiatives in partnership with company business leaders at multiple levels. Reflecting the importance of people to our business, General Mills employs a Director of Diversity and Inclusion; a Director of Global Health Services; and a Vice President of Engineering, Global Safety and Environment’. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Met: Day-to-day responsibility for AG in supply chain: ‘Our supply chain and sourcing executive teams have accountability for our responsible sourcing programs. These teams meet at least twice a year to review progress.(...) To ensure alignment across the function, all sourcing employees complete online learning on our supplier code of conduct’. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul>
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights: The Company indicates that ‘the most direct incentive tie for the Sourcing organization is through our Global Responsible Sourcing program, which drives human rights through our supply facilities. General Mills’ F20 goal is to prioritize and address inherently high-risk supply locations. This goal is stated in our plans as an organization and will be measured. Achievement of these plans directly impact the performance rating and incentives for Sourcing leadership and the CSR team including manager and assistant manager”. However, incentives need to be referred to a senior management level (senior executives). The Company discloses ‘Zero Loss’, program (which includes human rights), responsibility of the Executive VP of Supply chain. However, no details found on whether there are incentives for this person tied to delivery of this program. [Proxy Statement 2018, 2018: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a> &amp; 2019 Engagement, 21/06/19: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
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"> <li>• Not met: HR risks is integrated as part of enterprise risk system: Although the Company conducts risk assessment on direct suppliers, no evidence found on whether human rights issues are integrated as part of the broader enterprise risk management systems. The Company indicates that ‘beginning in F20, Global Sourcing is expanding our risk management efforts to all areas of spend globally and beyond financial and supply risks to include all pillars of our Supplier Code of Conduct: Business Ethics, Environment, Health &amp; Safety and Human Rights/Labor. General Mills is actively bringing together all risks in one visualization tool to provide the Sourcing organization a full view and the ability to mitigate and correct human rights concerns’. However, it is still not clear that the Company integrates risks related to human rights in the Company’s main risk system, which reaches the top level of the company. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; 2019 Engagement, 21/06/19: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy	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"> <li>• Met: Commits to ILO core conventions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	commitment(s) within Company's own operations		<ul style="list-style-type: none"> <li>• Not met: Communicates its policy to all workers in own operations: On its website, the Company indicates: 'we communicate our expectations through training opportunities and educational modules on our company intranet. Employees participate in live and online scenario-based training to illustrate ethical decision-making in daily business activities. Posters highlighting key messages from our Code of Conduct are posted in manufacturing facilities and offices. The code and posters are available in 13 languages for our global work force. Employees also have access to an intranet site dedicated to Ethics &amp; Compliance information and resources.' Moreover, the company indicates, in its Global Responsibility Report 2019, that 'Annually, our company leaders – from managers upward, nearly 10,000 employees – must attest to compliance with our Code of Conduct and business conduct policies. This certification is evidence of our high expectations for ethical conduct in every aspect of our business. (...) The program (Our comprehensive Code of Conduct and Ethics &amp; Compliance program) includes extensive online resources and self-directed courses. Our courses and communications illustrate how our Code of Conduct and employee policies apply to our employees' day-to-day responsibilities. Our Ethics &amp; Compliance website provides access to program resources – available in 10 languages – and employee policies are available in our Global Policy Center'. However, no evidence found that it actively communicates its policy commitment to all workers, not only managers, including local languages where necessary. Also, although managers must attest to compliance with the Code of conduct, and there are posters with its content in factories and offices, and the Company carries out online training in the content of the code, it does not contain human rights policies. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> <li>• Met: Commits to all 4 ILO core conventions for suppliers</li> <li>• Met: Communicating policy down the whole AG supply chain: The Company indicates that 'the Supplier code of Conduct is disseminated to suppliers through our purchase orders and supply agreements. In addition to written communication, we are beginning to integrate the Supplier Code into existing sourcing processes, supplier management tools, and eSourcing activities'. The Supplier code states that 'we expect you to apply similar standards to your own suppliers and subcontractors by communicating the expectations contained in this Code of Conduct and holding them accountable as well. This includes contract and seasonal workers and temporary agencies'. [Submission to CHRB disclosure platform, 12/2016: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As indicated above, some of the ways in which the code is disseminated include purchase orders and supply agreements. [Submission to CHRB disclosure platform, 12/2016: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Including on AG suppliers: No evidence found on whether the Company requires to suppliers to cascade the contractual or other binding requirements down their supply chain.</li> </ul>
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The human rights policy states that 'training is an important part of effective human rights practices. We therefore undertake efforts to build awareness about our human rights policies and procedures'. However, no evidence found of details in relation to training all employees in human rights policies. No further evidence found in its Global Responsibility Report 2019. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Met: Trains relevant AG managers including procurement: The Company indicates that 'to ensure alignment across the function, all sourcing employees complete online learning on our supplier code of conduct'. In 2018, we also trained more than 190 supply chain employees on our responsible sourcing, supplier diversity and sustainable sourcing programs as part of formal on boarding for all new Global Sourcing employees'. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	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"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: The Company indicates that 'we address human rights through a multifaceted approach, including supplier assessments, audits and direct engagement. Our Supplier Code of Conduct is the backbone of our program. (...) Since 2009, third-party firms have conducted independent audits of our owned locations and co-packers, which cover human rights, health and safety, the environment and business integrity. (...) In fiscal 2018, we transitioned co-packers to the Sedex Members Ethical Trade Audit (SMETA) protocol. This framework is widely recognized by companies in the food sector, which enables suppliers to share audit results with customers and improve efficiency. Another benefit is that remediation of identified non-compliances will be managed and independently verified by a third-party. By fiscal 2020, our co-packers will follow the same overall audit process as our Tier 1 suppliers'. In report 2018 the Company indicated that as part of the supplier responsibility program it also monitors human rights in owned locations: 'third-party firms have conducted independent audits of our owned locations and co-packers, which cover health and safety, business integrity, human rights and environmental responsibility'. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Global Responsibility report, 2018: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Met: Monitoring AG suppliers: See above. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Slavery and human trafficking statement, 02/2018: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: During the audit process, 'we require corrective plans and resolution for any identified non-compliances. The Company indicates that 'when significant issues arise in audits, a Critical Finding Alert email is issued to key General Mills team members, including regional leadership, division counsel and subject matter experts. This group gathers to review the relationship with the facility, discuss the findings and determine next steps. A regular check-in meeting occurs to review progress the facility has made until the issue is resolved'. Although the Company disclosed the number of non-compliances in owned locations and co-packers, no evidence found of data in relation to non-compliances for suppliers (first tier-suppliers). [Global Responsibility report, 2018: <a href="http://generalmills.com">generalmills.com</a> &amp; Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Example of corrective action [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Discloses % of AG supply chain monitored: The Company indicates that it audited 62 of its owned locations and co-packers, representing about 25% of the total. However, no evidence found on the specific percentage of the supply chain monitored.</li> </ul>
B.1.7	Engaging business relationships	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"> <li>• Not met: HR affects AG selection of suppliers: The company indicates that 'we are integrating supplier responsibility into our global sourcing standards and processes. As of fiscal 2019, all General Mills buyers: Include a standardized supplier responsibility review in their category strategies; Evaluate the risk of prospective suppliers, using due diligence guidance; Include language in contracts related to social and environmental performance, if appropriate; Meet with strategic suppliers twice a year to discuss progress and provide feedback using a performance scorecard, which includes responsible sourcing. Continual improvement is required'. However, it is not clear how human rights performance is taken into account in the identification and selection of potential business relationships. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Met: HR affects on-going AG supplier relationships: The supplier code of conduct states that 'we reserve the right to terminate any agreement or arrangement with you if compliance with this Code cannot be demonstrated'. The 'slavery and human trafficking statement' indicates that that 'if a facility fails to make progress against a corrective action plan, they are subject to review and sanctions, including potential termination. We have terminated relationships with suppliers for issues such as unresponsiveness or repeated audit findings'. [Slavery and human trafficking</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			statement, 02/2018: <a href="http://generalmills.com">generalmills.com</a> & Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Met: Working with AG suppliers to improve performance: As part of its Sustainable sourcing commitment, the Company describes how it works with suppliers to improve performance in environmental and social areas. In coca supply chain, it indicates that 'we work directly with our suppliers to address systemic challenges and enforce our Supplier Code of Conduct'. Challenges include economic viability and child labour – 'helping families keep children in school'. Work carried out includes women's empowerment (training people on gender issues in Ghana and Ivory Coast) and children's education (financing resources for schooling). It also indicates that it works in 'farmer incomes'. It also reports supporting palm oil suppliers to increase traceability of its supply chain. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The company indicates that 'at General Mills, we engage with stakeholders to accelerate progress on social and environmental initiatives. Our approach includes open dialogue, collaboration and transparent disclosure. This strengthens our ability to balance business and societal interests; build robust relationships globally across sectors; and ultimately, identify innovative solutions that create shared, sustainable value'. A list of stakeholders is disclosed. However, no description found of how the company has identified, and engaged with affected and potentially affected stakeholders in the last two years. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in AG SC engaged: It is not clear that the engagement includes workers or local communities in its supply chain. No further information found. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Communities in the AG SC engaged: See above. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company states that 'in 2018, we partnered with Hudson Consulting to conduct an assessment to update our list of material global responsibility issues, last done in 2015. (...) Based on the input, we created and distributed a materiality assessment survey to stakeholders to determine the relative importance of each issue. We received 30 responses from external stakeholders, most having a global focus and representing a wide variety of perspectives, including from academics, consultants, customers, investors, nongovernmental organizations and suppliers'. Among the issues that are most material to the company global responsibility strategy there is 'Protect and respect human rights throughout the value chain. Sub-issues: child labor; discrimination; fair compensation; forced labor; freedom of association and collective bargaining; gender equality; human trafficking; land rights; safe and healthy working conditions; working hours'. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Met: Identifying risks in AG suppliers: Another issues that is among the most material to the company global responsibility strategy is: 'improve social, environmental and economic impacts of raw material sourcing. Sub-issues (...); risk assessments and audits; (...); supplier diversity; supplier responsibility; traceability'. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Met: In consultation with stakeholders: As indicated above, the Company consulted with suppliers. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: In consultation with HR experts: As indicated above, the Company consulted with academics and consultants. However, no details found on whether these include human rights experts. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Triggered by new circumstances</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry 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"> <li>• Not met: Salient risk assessment (and context): The Company indicates that ‘we worked with Bureau Veritas to expand and elevate our responsible sourcing program in our first-tier supplier base. After conducting a high-level risk assessment and segmentation of 2,300 first-tier supplier facilities worldwide, we identified about 1,200 facilities that have inherent risk, based on analysis of environmental, social and governance factors. We also assessed suppliers that provide raw materials or ingredients covered by our sustainable sourcing goals, as well as natural and organic products’. However, it is not clear what the company considers to be its salient human rights issues. Also, CHRB is looking for a description which includes how relevant factors are taken into account, such as geographical, economic, social and other factors when assessing its human rights risks. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Public disclosure of salient risks: Although the Company has carried out assessment of risks and identified 1,200 facilities that have inherent risk, it is not clear which are the human rights risks found as a result of the process. No further information found. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; 2019 Engagement, 21/06/19: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking 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"> <li>• Not met: Action Plans to mitigate risks: The Company indicates that ‘beginning in fiscal 2018, we will require facilities identified to have inherent risk to complete a self-assessment and provide supporting documentation on policies, procedures and previous audits (when available), to provide further visibility regarding potential risk exposure’. Depending on the results some facilities will undergo audits/monitoring process based on Sedex. However, no evidence found a system to generally mitigate salient human rights issues. Current evidence focus in specific supplier compliance rather in developing wider action plans to prevent or mitigate/remediate salient issues. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Including in AG supply chain: Regarding its 1 Tier suppliers, the company indicates that ‘we require facilities identified as having inherent risk to complete a self-assessment and provide supporting documentation on policies, procedures and previous audits, when available. Depending on the results, some facilities are required to undergo an onsite third-party audit, based on the SMETA protocol, covering human rights, health and safety, the environment and business integrity’. However, as indicated above, current evidence focus in specific supplier compliance rather in developing wider action plans to prevent or mitigate/remediate salient issues in supply chain. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Example of Actions decided: As the result of an increase in the number of palm oil related grievances, the company indicates that ‘we expect our direct suppliers to robustly manage their own supply chains to ensure palm volumes supplied to General Mills meet or exceed our standards. In cases where there is verified non-compliance with our policy, or where there is continued failure to remediate verified non-compliances in a timely manner, we take steps to remove those producers from our supply chain. In 2018, we demonstrated this in action when we instructed our suppliers to remove Indofoods and Salim Group companies from our supply chain following persistent and concerning social and environmental allegation’. However, no example of the specific conclusions reached and 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. The assessment process required in this indicator is a result of a due diligence process to find salient human rights risks, not of complaints detected by grievance channels. [Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609 1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the	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"> <li>• Not met: System to check if Actions are effective: The Company indicates that ‘Global Sourcing has engaged with Bureau Veritas, our global program manager, to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	effectiveness of actions to respond to human rights risks and impacts		<p>assess, address, monitor and close all pillars in our Supplier Code of Conduct including human rights via the Safe Supply portal. Annual plans are completed to ensure effectiveness of the actions we require of suppliers as well as incorporate lessons learned'. However, this evidence seems to focus in individual supplier action plans (compliance monitoring) rather in monitoring whether overall risks related to salient human rights issues are being prevented, mitigated or remediated. [2019 Engagement, 21/06/19: <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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"> <li>• Met: Comms plan re identifying risks: The Company has communicated in its global responsibility report its system to identify human rights risks and impacts including own operations and supply chain (see B.2.1). [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Comms plan re assessing risks: See indicator B.2.2 [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609 1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: Comms plan re action plans for risks: See indicator B.2.3 [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609 1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: Comms plan re reviewing action plans: See indicator B.2.4 [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609 1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: Including AG suppliers: Although human rights impacts identification includes supply chain, no evidence found in the rest of indicators B.2.2-B.2.4 to be awarded. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609 1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### C. Remedies and Grievance Mechanisms (15% 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"> <li>• Met: Channel accessible to all workers: The Code of conduct, which applies to all, refers to a channel to report concerns, the ethics point, which is available online. The Ethics Line is hosted by an independent reporting service. It's available 24 hours a day, 7 days a week, from any location worldwide and is multi-lingual. [Code of Conduct, 2018: <a href="https://generalmills.com">https://generalmills.com</a> &amp; Ethicspoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages: As indicated in the code, the ethics line is multi-lingual. On its website, it provides 12 different languages to use the channel. [Code of Conduct, 2018: <a href="https://generalmills.com">https://generalmills.com</a> &amp; Ethicspoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Met: Opens own system to AG supplier workers: The supplier code of conduct provides guidelines to report concern, including to contact the General Mills ethics line on the website and/or phone number for suppliers located in US, Canada and Puerto Rico. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	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"> <li>• Met: Grievance mechanism for community: The Company indicates that the 'ethics line is available any day, any time of day, in multiple languages. Anyone can use it to share a concern or ask a question – employees, customers, suppliers, etc.'. The ethics line is referred in the human rights policy as a proper channel to report on human rights issues. [Submission to CHRB disclosure platform, 12/2016: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		Score 2 <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: See above. The Ethics Point is available in 13 languages (including Chinese, Korean, Thai, among others). [Ethicspoint: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Not met: AG supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Response timescales: The Company indicates in its disclosure document that 'any non-compliance observed through a 3rd party auditor has a prescribed timeline for the facility to respond. Facilities have the ability to utilize our Ethics line to report grievances. The Ethics Line is a speak-up resource hosted by a 3rd party. It allows for 24/7/365 phone/web reporting and supports multilingual and anonymous reporting. Ethics Line cases are routed to E&amp;C to triage for initial review, who then align an investigation team (HR, Global Security, GIA, Finance or Law) depending on the report'. However, no evidence found of what these timescales are for addressing the complaints and concerns and for informing the complainant. [2019 Engagement, 21/06/19: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: How complainants will be informed: See above. [2019 Engagement, 21/06/19: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Code of conduct indicates that 'General Mills will not retaliate – or permit retaliation – against any employee for good faith reporting of ethical or legal concerns or cooperating in a company investigation'. A commitment to not retaliate is also made on the ethics point website. The Company indicates in its disclosure to CHRB that anyone can use the ethics line. [Code of Conduct, 2018: <a href="https://generalmills.com">https://generalmills.com</a> &amp; Submission to CHRB disclosure platform, 12/2016: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Practical measures to prevent retaliation: The ethics line is handled by a third party. In addition, the anonymous reporting is possible both through the telephone and website reporting mechanisms. [Code of Conduct, 2018: <a href="https://generalmills.com">https://generalmills.com</a> &amp; Ethicspoint: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation: The Company indicates, in its supplier code, that 'You will prohibit unlawful retaliation against employees who report a compliance or ethical issue learned during the course of work performed for General Mills, or who cooperate in good faith with the investigation of a complaint'. However, it is not clear the company expects suppliers to prohibit retaliation against other stakeholders (including those that represent them) for raising human rights related concerns. [Supplier code of conduct: <a href="https://generalmills.com">generalmills.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not met: Evaluation of the channel/mechanism

## D. Performance: Company Human Rights Practices (20% 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"> <li>• Not met: Living wage in supplier code or contracts: The Company indicates in the supplier code of conduct that 'you will provide employees with compensation that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards'. However, more details are required in relation to what needs the wage should cover. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not met: Avoids business model pressure on HRs (purchasing practices): The Company indicates that 'the global Sourcing organization has visibility to risks by supplier code of conduct pillars down to our lowest taxonomy. This data drives strategies and scorecards. For example, the Fats and Oils category can be broken down to the specific oil to differentiate between palm and other types of oils. This level of detail provides a true risk assessment and allow our Sourcing organization to craft the correct strategy by material'. However, no evidence of how these strategies are crafted in order to avoid price or short notice requirements or other business considerations undermining human rights. [2019 Engagement, 21/06/19: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices): The Company indicates that it gives preference to RSPO certified sustainable palm oil and in its process to trace the palm oil supply chain it indicates that 'we are driving toward increased public transparency regarding upstream supply and now expect all of our palm oil suppliers to follow a similar practice'. However, although the Company is working towards supplying from sustainable sources, it is not clear whether it establishes specific positive incentives based on criteria that includes human rights performance on a general basis. No further information found either in the Palm Oil Statement 2019 or in the Global Responsibility Report 2019. [Palm oil sourcing statement, 22/03/2019: <a href="http://generalmills.com">generalmills.com</a> &amp; Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing the supply chain	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifies suppliers back to manufacturing sites (factories or fields): The Global responsibility report states that in 2017 the Company conducted, in collaboration with Bureau Veritas, a 'high-level risk assessment and segmentation of 2,300 first-tier direct supplier facilities worldwide'. It also indicates that 'we also assessed suppliers that provide raw materials or ingredients covered by our sustainable sourcing goals, as well as natural and organic products. During fiscal 2018, we began inviting facilities globally to participate in our responsible sourcing program'. Moreover, the Company indicates that it started to map supply chain of sugarcane. Finally, the Company indicates, in its disclosure document, that 'we can generate Tier 1 maps for all direct and indirect material categories at the supplier, supplier facility level broken down by type of material purchased down to our lowest taxonomy'. A map is also provided. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a> &amp; 2019 Engagement, 21/06/19: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of SP and why: The Company provides the names of global direct palm oil suppliers, and the lists of mills supplying its direct suppliers (name, country and coordinates). However, no evidence found of the Company disclosing the mapping of the most significant parts of its supply chain (and defining how it defines that are the most significant). No further information found. [Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hk14089609 1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (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"> <li>• Not met: Child Labour rules in codes or contracts: The supplier code of conduct contains a commitment on child labour. It also indicates that ‘young employees under the age of 18 will not work at night, in hazardous conditions or in work that interferes with schooling. However, no evidence found in relation to guidelines on age verification and remediation programmes. No further information found. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: How working with suppliers on child labour: The Company indicates that in cocoa supply chain child labour is a challenge, and provides an example of working carried out to help families keep children in school in Ivory Coast, where the Company funds children’s education. It provided 700 school kits and backpacks to vulnerable children. Moreover, when it comes to cocoa production, the company indicates that ‘we work directly with our suppliers to address systemic challenges and enforce our Supplier Code of Conduct, which prohibits forced and child labor. In addition, we are a member of the World Cocoa Foundation (WCF), which works with the food industry’. However, no description found on how it works with suppliers to eliminate child labour and to improve working conditions for young workers. [Global Responsibility report, 2018: <a href="http://generalmills.com">generalmills.com</a> &amp; Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The supplier code states that ‘you will not use involuntary labor or require payment of fees or the surrendering of identification as a condition of employment. All employees will understand the terms of their employment’. The Company also indicates in the ‘slavery and human trafficking statement’ that it’s fully supportive of the Consumer Goods Forum’s ‘Forced Labor Resolution and Priority Principles: every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work’. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a> &amp; Slavery and human trafficking statement, 02/2018: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The supplier code states that ‘you will not use involuntary labor or require payment of fees or the surrendering of identification as a condition of employment. All employees will understand the terms of their employment’. The Company also indicates in the ‘slavery and human trafficking statement’ that it’s fully supportive of the Consumer Goods Forum’s ‘Forced Labor Resolution and Priority Principles: every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work’. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a> &amp; Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: How working with suppliers on free movement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (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"> <li>• Not met: FoA &amp; CB rules in codes or contracts: Its Suppliers Code of Conduct indicates: ‘You will recognize and respect the rights of employees to freedom of association and collective bargaining. [...] You will prohibit unlawful retaliation against employees who report a compliance or ethical issue learned during the course of work performed for General Mills, or who cooperate in good faith with the investigation of a complaint.’ However, there are no guidelines related to prohibition of intimidation, harassment and violence against union members and union representatives. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.b	Health and safety: Fatalities, lost days, injury 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"> <li>• Met: Sets out clear Health and Safety requirements: The Supplier code includes the following guideline: ‘We require that you will provide employees with a safe, clean and healthy work environment. You are also responsible for integrating comprehensive health and safety management practices and job-specific safety training into your business. Employees will have the right to refuse and report unsafe or unhealthy working conditions. You will meet or exceed applicable laws and industry standards in this area’. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: Injury Rate disclosures: Only for its own employees. No further information found. [Global Responsibility report, 2018: <a href="http://generalmills.com">generalmills.com</a> &amp; Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Lost days or near miss disclosures: Only for its own employees. No further information found. [Global Responsibility report, 2018: <a href="http://generalmills.com">generalmills.com</a> &amp; Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> <li>• Not met: Fatalities disclosure: Only for its own employees. No further information found. [Global Responsibility report, 2018: <a href="http://generalmills.com">generalmills.com</a> &amp; Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not met: Rules on land &amp; owners in codes or contracts: The company indicates, in its human rights policy, that they ‘recognize the importance of land rights as well as the principle of free, prior and informed consent (FPIC), as outlined in our Palm Oil Statement; support implementation of FPIC by national authorities’. However, no land guidelines found in its supplier code of conduct on process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements. Also no evidence found that the company works with suppliers to improve their practices in relation to land use/ acquisition. No further information found in the Palm Oil Sourcing Statement 2019. [Palm Oil Sourcing Statement 2019, 15/07/19: <a href="https://generalmills.com">https://generalmills.com</a> Mills 2019\Disclosure GM 2019\General Mills Notes.docx#_Hlk14089609 1,1666,1728,4094,Default,<a href="http://generalmills.com">generalmills.com</a> &amp; Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Not met: How working with suppliers on land issues: See above. [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a> &amp; Human rights policy on website, 05/2015: <a href="http://generalmills.com">generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Rules on water stewardship in codes or contracts: Regarding suppliers, the Company’s water policy states that it sets ‘clear expectations that our suppliers provide a safe and healthy work environment including safe water for drinking and hygiene’. However, no evidence found of specific guidelines in the supplier code of conduct or in other supplier contractual arrangement in relation to access to safe water. [Water policy on website: <a href="http://generalmills.com">generalmills.com</a> &amp; Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a>]</li> <li>• Met: How working with suppliers on water stewardship issues: The Company indicates that improving watershed health ‘requires extensive collaboration to protect the water quality and supply that benefit growers, communities and the environment’. The Company’s water stewardship plans cover both its operations and supply chain: ‘water issues are local, so we take a risk-based approach to address specific challenges facing targeted geographies. We follow our four-phase approach to develop and implement watershed health strategies in eight priority watersheds’. ‘We assessed 15 key ingredients in 36 sourcing regions and 66 facilities (including 17 supplier partners), covering 41 watersheds globally’. The four-phase approach includes establishing multi-stakeholder water stewardship plan to implement identified improvements’. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts: The Company indicates that 'in support of our mission and in honor of this important international holiday, we recently signed on to the United Nations Women's Empowerment Principles(WEP)'. These principles include 'establish high-level corporate leadership for gender equality; treat all women and men fairly at work – respect and support human rights and non-discrimination; ensure the health, safety and well-being of all women and men workers'. However, it is not clear that these principles are included in its contractual arrangements with its suppliers (or supplier code). [Supplier code of conduct: <a href="http://generalmills.com">generalmills.com</a> &amp; Empowering women - commitment, 09/03/2015: <a href="http://blog.generalmills.com">blog.generalmills.com</a>]</li> <li>• Met: How working with suppliers on women's rights: The Company provides different examples on its work on women's empowerment. It has a supplier diversity team embedded in global sourcing to build partnerships across the Company to match diverse suppliers with business needs and opportunities. It also provides training to sourcing buyers in North America to incorporate diversity into strategic plans (spending in diverse suppliers including women, veteran, LGBTQ and others). In addition, in the Cocoa supply chain the Company reports that in Ivory Coast it focused in women's empowerment, educating in gender issues. In the context of supplier diversity, the Company states that it participates in the Women's Business Enterprise National Council and the Women's Business Development Center. 'Through these organizations and other industry groups, we benchmark, share best practices and network with prospective diverse suppliers'. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 22.24 out of 80 points scored in themes A-D & F has been applied to produce a score of 5.56 out of 20 points for theme E.

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.19 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, General Mills made data public that met one or more elements of the methodology in 23 cases, leading to a disclosure score of 2.19 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Global Responsibility report includes a Global Reporting Initiative index. [Global Responsibility 2019, 2019: <a href="http://globalresponsibility.generalmills.com">globalresponsibility.generalmills.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	<p>General Mills met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

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

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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