

Company Name Kellogg
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 64.1 out of 100

Theme Score	Out of	For Theme
7.7	10	A. Governance and Policies
18.1	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
8.5	20	D. Performance: Company Human Rights Practices
17.5	20	E. Performance: Responses to Serious Allegations
6.9	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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 1 & 2: The Company is a signatory to the UNGC. Met: UDHR: In its Human Rights Report 2018, the Company states: 'Kellogg is committed to, aligned with, and supports, all internationally recognized human rights as codified in the: United Nations Guiding Principles; Universal Declaration of Human Rights; International Bill of Human Rights; ILO core labour standards, as laid out in the following 8 conventions: Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 & No. 98), The elimination of all forms of forced and compulsory labour (Convention No. 29 & No. 105), The effective abolition of child labour (Convention No. 138 & No. 182), The elimination of discrimination in respect of employment and occupation (Convention No. 100 & No. 111); UN Global Compact's Ten Principles; OECD Guidelines for Multinational Enterprises'. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] Met: International Bill of Rights: See above [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: The Company 'is committed to, aligned with, and supports [...] the United Nations Guiding Principles'. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] Met: OECD: The Company 'is committed to, aligned with, and supports [...] the OECD Guidelines for Multinational Enterprises. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: Kellogg is a member of the UN Global Compact, and supports the ten principles. Its Code of Ethics states that 'it is committed to maintaining a safe and healthy workplace for our colleagues, business partners and visitors as well as people in the communities in which we operate.' The Company states that 'we are committed to maintaining an ethical and transparent supply chain free of forced labour, including slavery and human trafficking. [Code of ethics, Sep 2013 & Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Not met: Explicitly list All four ILO for AG suppliers: The Global supplier code of conduct include commitments to child labour, forced labour and discrimination. In relation to freedom of association and collective bargaining, it states the following: 'Suppliers must respect the rights of their Employees to freely associate, organize, and bargain collectively, where allowed by law'. However, no details found on alternatives for those countries where there are legal restrictions to the exercise of these rights. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company commits to the ILO standards in their Human rights and Supplier Human Rights policy. In their Process Against Forced Labour Document the Company clarifies the core labour standards that they refer to when they commit to the "ILO core labour standards". The company lists: "Our commitment aligns to, and supports, all internationally recognized human rights as codified in the...: • ILO core labour standards, as laid out in the following 8 conventions: • Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 & No. 98) • The elimination of all forms of forced and compulsory labour (Convention No. 29 & No. 105) • The effective abolition of child labour (Convention No. 138 & No. 182) • The elimination of discrimination in respect of employment and occupation (Convention No. 100 & No. 111)" [Progress Against Forced Labor: 2017, May 2018] • Met: Respect H&S of workers • Met: H&S applies to AG suppliers
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Respect land ownership and natural resources: The Company states that it respects Land Tenure Rights, including the rights of indigenous and local communities to give or withhold their Free, Prior and Informed Consent to all new development or operations.' [Palm Oil Commitment, 2016 & Global Sustainability 2020 commitments, 42794] • Met: Respecting the right to water: Kellogg states that it respects the human right to water as defined by the United Nations Committee on Economic, Social and Cultural Rights and General Assembly. [Global Sustainability 2020 commitments, 42794] • Met: Expecting suppliers to respect these rights: The Global Supplier Code of Conduct states that 'suppliers must respect the land rights of women and communities affected by their operations and sourcing practices, and must ensure transparent reporting and disclosure of concession agreements and/or operating permits to affected communities. Suppliers must ensure fair negotiation on land transfers and must refrain from cooperating with any host government's illegitimate use of eminent domain to acquire land that will be used to provide products and services to Kellogg, adhering to the principle of Free, Prior and Informed Consent. Suppliers must identify small-scale producers to ensure they have access to fair market value for their crops, goods or services.' [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards • Met: FPIC for all • Not met: Zero tolerance for land grabs • Met: Respecting the right to water • Met: Expecting suppliers to respect these rights
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights: The Company has a public commitment to respect women's rights. In addition, Kellogg states that it respects the human right to water as defined by the United Nations Committee on Economic, Social and Cultural Rights and General Assembly. [Global Sustainability 2020 commitments, 42794]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	industry – people’s rights (AG)		<ul style="list-style-type: none"> • Not met: Children's rights • Not met: Migrant worker's rights • Met: Expects suppliers to respect these rights: The Company has a public commitment to respect women's rights and supports the UN's Women's Empowerment Principles. It states in it's Global Supplier Code of Conduct that expects suppliers to support these commitments in its supplier agreements. [Global Sustainability 2020 commitments, 42794] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: Kellogg is a signatory to the Women's Empowerment Principles. [BHRC Company response, 43229: business-humanrights.org] • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Met: Expecting suppliers to respect these rights: The Company has a public commitment to respect women's rights and supports the UN's Women's Empowerment Principles. It states in it's Global Supplier Code of Conduct that expects suppliers to support these commitments in its supplier agreements. [Code of ethics, Sep 2013 & Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com]
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"> • Met: Regular stakeholder engagement: In its 2018/2019 CR Report, the Company indicates: 'Across our value chain, we engage with a wide variety of stakeholders to inform our corporate responsibility work and advance our company's commitments'. Examples of these initiatives are included the Corporate Responsibility Report.' It also includes a figure with engagement actions per stakeholder group, for instance with Suppliers: Regular meetings; Supplier conferences; Supplier surveys; Sedex participation; NGO partnerships; Global Supplier Code of Conduct. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: We could not identify recent evidence of stakeholder design engagement.
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states in its Human Rights Position Statement, "It is our policy that our operations should not infringe upon the inherent rights of others and that should adverse impacts be discovered, we are committed to remediation in accordance with international standards and the expectations put forth by our customers, consumers, and stakeholders for us." [Human Rights Position Statement, Dec 2016] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts: In its 2018 Global Sustainability Palm Oil Milestone, the Company states: 'We continue to be committed to working with our suppliers, our peers, industry groups, and civil society to identify issues and support best practices and remediation/mitigation efforts.' Not particular commitment found, however, to remedy adverse impacts either through the business relationship's own mechanisms or through collaborating with those business relationships on the development of third party non-judicial remedies'. [2018 FY Global Sustainable Palm Oil Milestone, 2019: crreport.kelloggcompany.com]
A.1.6	Commitment to respect the rights of human rights defenders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its Code of Ethics that "We help each other by speaking out when a co-worker's conduct makes us uncomfortable" and "Acts of violence, threats and physical intimidation have no place at Kellogg and can result in immediate disciplinary action, up to and including termination of employment." In the Company's additional disclosure CHRB document the Company states 'Kellogg Company has a zero tolerance policy for threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations' [Code of ethics, Sep 2013]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects AG suppliers to reflect company HRD commitments: The Company states in it's Supplier Code of Conduct 'Suppliers shall not engage in any form of retaliation including threats, intimidation, physical, or legal attacks against human or environmental rights defenders, or those exercising their rights to freedom of expression, association peaceful assembly or protest against the business or its operations. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com]

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Company states that "At a board level, it [HR] is managed by our Social Responsibility and Public Policy board sub-committee" and HR policy commitments are signed off by John Bryant, CEO and Chairman of the Board. [Code of ethics, Sep 2013 & Human Rights Position Statement, Dec 2016] • Met: Board level responsibility for HRs: In its 2018 Human Rights Report, the Company indicates: 'At the board level, human rights, including forced labour and modern slavery, are overseen by the Social Responsibility and Public Policy committee, which assists the Board in discharging its oversight responsibilities with respect to certain social and public policy issues.' [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The Company co-signed the WBCSD CEO Guide to Human rights, which is considered a proxy for this subindicator. [WBCSD - CEO Guide to Human Rights: docs.wbcسد.org]
A.2.2	Board discussions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board/Committee review of salient HRs: The Company states 'Kellogg Company's Social Responsibility and Public Policy Committee of the Board of Directors oversees our corporate responsibility strategy. Our Senior Vice President (SVP) of Global Corporate Affairs, who reports to the Chairman and Chief Executive Officer (CEO), is responsible for successfully implementing the strategy and regularly updating the CEO and Board committee. Our Chief Sustainability Officer (CSO) reports to the SVP of Global Corporate Affairs.' In its Corporate Responsibility report outlines the material issues covered under the 'Sustainability' scope, including human rights, among a number of other salient ESG issues. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com & Corporate Responsibility Report 2017/2018, May 2018] • Met: Examples or trends re HR discussion: The Company discloses in their Annual Shareholder Meeting 'Human rights, including forced labour, is overseen by the Social Responsibility and Public Policy committee of the Kellogg Board. Social Responsibility and Public Policy Committee. Pursuant to a written charter, the Social Responsibility and Public Policy Committee, among other things, assists the Board in discharging its oversight responsibilities with respect to certain social and public policy issues. The Committee reviews the Company's policies, programs and practices concerning public policy, government relations, philanthropic activities/charitable contributions, sustainability and related topics. The Committee is particularly focused on the intersection of philanthropy, public policy, and sustainability and the Company's goals. An update on human rights was given to this subcommittee in April, 2017. <p>In addition, executive oversight is led by Diane Holdorf, Chief Sustainability Officer, and Alistair Hirst, SVP of Global Supply Chain. Leaders from Human Resources, Supply Chain, Procurement, Sustainability, and Legal work together define Human Rights strategy, identify risks, and execute strategies as part of a cross-functional Human Rights Working Group.' [Engagement Feedback, 09/08/2018]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both examples and process: As above.
A.2.3	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Incentives for at least one board member: In its 2018/2019 CR Report, the Company states: 'numerous leaders are accountable for achieving specific corporate responsibility commitments, based on their roles. Our CEO, SVP, CSO and other leaders have annual performance goals tied to the company's Corporate

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			<p>Responsibility metrics'. In addition the Company discloses in its disclosure to CHRB that 'Human Rights risks are part of the procurement supply chain metrics, and therefore contribute to overall executive performance incentives, which rolls all the way up to the CEO, who is a member of the board.' [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com & Engagement Feedback, 09/08/2018]</p> <ul style="list-style-type: none"> • Not met: At least one key AG HR risk, beyond employee H&S: See above. <p>However, no details found in relation to which aspects of human rights are linked to the incentive scheme for CEO/board members. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public: See above.

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"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: The Company states "Human rights are governed collaboratively at Kellogg. At the working level, it is managed by our Sustainability, Procurement, Legal, and Ethics & Compliance functions. At senior leadership level, it is managed by our heads of Legal and Compliance, Human Resources and Global Supply Chain. At a board level, it is managed by our Social Responsibility and Public Policy board sub-committee." [BHRRRC Company response, 43229: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company disclosed to the CHRB 'At the day-to-day level, human rights issues are collaboratively managed through various functions and have been embedded into the operational responsibilities of relevant roles. At the global level, day-to-day oversight of human rights is coordinated by the global sustainability team, which communicates expectations and strategy for implementation with supply chain partners and publicly reports global progress against salient human rights metrics. Each region, North America, Latin America, Asia-Pac, and Europe, has a regional responsible sourcing manager within their procurement departments to support and manage human rights related activities such as projects, pilots, or capability building workshops. They are also responsible for communicating to category managers human rights considerations during sourcing and category strategy events and assessing potential mitigation efforts. The responsible sourcing managers also track supplier performance and regional KPIs for metrics related to human rights. These roles report to their regional procurement directors and are accountable for achieving the human rights related regional metrics goals set forth by global sustainability each year. The global director of supplier engagement and development coordinates the reporting of regional execution with the global sustainability team. The Chief Sustainability Officer shares monthly progress with regional and global leadership. The Chief Sustainability Officer reports to the Senior Vice President of Corporate Affairs who reports to and updates the CEO and board regarding annual targets and performance. <p>Other functions involved in the day-to-day management of human rights issues are Ethics and Compliance, which is responsible for the implementation of policy for internal and supply chain operations, Human Resources, which incorporates human rights criteria into their internal audit processes and ensure dissemination of policy and practice throughout our manufacturing operations, and Legal, which verifies that policies and procedures are in line with international and national laws and standards such as the ILO and the UNGPs. Each function is involved in decisions related to salient industry issues such as child labor, forced labor, freedom of association and collective bargaining, health and safety, land rights, water and sanitation, and women's rights. Representatives from each function sit on a human rights focused cross-functional team that meets monthly to ensure coordination of execution and global strategy.' [Progress Against Forced Labor: 2017, May 2018 & Engagement Feedback, 09/08/2018]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Day-to-day responsibility for AG in supply chain: The Company discloses to the CHRB 'At the global level, day-to-day oversight of human rights is coordinated by the global sustainability team, which communicates expectations and strategy for implementation with supply chain partners and publicly reports global progress against salient human rights metrics.' [Engagement Feedback, 09/08/2018]
B.1.2	Incentives and performance management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: The Company states in their 2016 Year-End Sustainability Milestones 'Our commitment to the advancement and respect of human rights begins at the top of our organization. Our policies are reviewed and approved by both our CEO and Board of Directors. Procurement leadership and category managers are responsible for execution of the Global Sustainability Commitments, including social accountability, which is reflected in their annual performance plans and annual incentives.' In addition, in its Disclosure to CHRB Platform from 2018, the Company indicates: 'Kellogg has an annual performance management scheme linked to aspects of our human rights commitments for multiple employees within the organization including global Procurement leadership, senior responsible sourcing managers, and category managers of high risk and/or priority categories.' No new relevant evidence found in last year report. [2016 Year-End Sustainability Milestones, 2016: kelloggcompany.com & Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] • Met: At least one key AG HR risk, beyond employee H&S: In addition, the Company indicates: 'Depending on the function, role, or level of responsibility related to the execution and achievement of these goals the percentage of impact to performance results varies. Performance metrics are related to delivery of annual human rights related targets such as percentage of high-risk suppliers with verified third-party audits and non-compliance remediations and percentage of in-scope suppliers registered and linked to Kellogg within the Sedex platform. Data and information from these sources is then analyzed by internal subject matter experts to determine human rights risk within supply chain such as the presence of forced labour indicators.' Therefore, diverse human rights issues are covered. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company states "The Audit committee of the Board is responsible for monitoring the ERM process. Results are also shared with the Social Responsibility & Public Policy Committee of the Board. The results of the risk assessment are integrated into the Board's processes. Oversight responsibility for each risk is allocated among the full Board and its Committees. Each key risk is reviewed at least annually, with many topics reviewed on several occasions throughout the year. Risks contained in the ERM process are outlined in the Corporate Responsibility report, including Human rights. No new relevant information in latest CR Report. [CDP Climate disclosure 2017, 42735: cdp.net & Corporate Responsibility Report 2017/2018, May 2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: In its 2018/2019 Corporate Responsibility Report, the Company indicates: 'Employees continue to receive annual training on the Code that addresses anti-corruption, anti-competitive behavior, data protection and human rights.' In addition, the Company states on its website that it uses 'interactive, immersive online training modules that highlight human rights issues like involuntary labour.' The Company states that its Code of Ethics is available in 13 languages. [Corporate Responsibility Report 2018/2019, Jun 2019: crrreport.kelloggcompany.com & BHRRC Company response, 43229: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2. • Met: Communicating policy down the whole AG supply chain: The Company states that 'we take a risk-based approach to determine which suppliers need additional awareness and education, or require verification of adherence to our policies, on this and other responsible sourcing issues.' Kellogg states that 'we proactively share best practices related to social and ethical issues with our suppliers through events such as our annual company-sponsored supplier day conferences. We are committed to actively engaging with our suppliers and their value chain network to ensure vigilance and adherence to all company policies.' The Company further states that all suppliers are required to adhere to its Supplier Code, which is included in all new supplier contracts and agreement. This is a requirement for supplier selection. [Policy Statement Prohibiting Involuntary Labor, Jun 2016 & Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Met: Requiring AG suppliers to communicate policy down the chain: Kellogg actively communicates our human rights policy requirements and expectations through the supply chain by "proactively shar(ing) best practices related to social and ethical issues with our suppliers through events such as our annual company-sponsored supplier day conferences" and by being "committed to actively engaging with our suppliers and their value chain network to ensure vigilance and adherence to all company policies." Furthermore the Global Supplier Code of Conduct states "'It is the Supplier's responsibility to ensure compliance with both the intent and letter of this Code among all Employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification". This requirement "includes all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (each a "Supplier" and collectively "Suppliers"). It also extends to parent, subsidiary, agents, subcontractors, and affiliate entities and applies to all employees, including permanent, temporary, contract, foreign, or migrant workers (each an "Employee" and collectively "Employees").' [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: These conditions are made binding by being in the Supplier Code of Conduct. Suppliers must comply at all times during the performance of its obligations under their Purchase Order with the terms of the Kellogg Supplier Code of Conduct. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Met: Including on AG suppliers: As above.
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Trains all workers on HR policy commitments: The Company states in its Corporate Responsibility report that its 'Employees continue to receive annual training on the Code that addresses anti-corruption, anti-competitive behavior, data protection and human rights.' It also reported in 2017 CR Report that it conducts 'ongoing training on the Code for all employees and regularly review and update it as appropriate' and 'to ensure that our employees are aware of our policies, standards and expectations, we utilize interactive, immersive online training modules that highlight human rights issues like involuntary labour.' It further states that 'a more detailed training and discussion regarding the risks and implications of involuntary labour was presented to our global procurement leaders and managers during our 2015 Global Procurement Summit.' [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com & Corporate Responsibility Report 2017/2018, May 2018] • Met: Trains relevant AG managers including procurement: as above. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Met: Both requirements under score 1 met: as above.
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company has disclosed to the CHRB 'Within our own operations, we are monitoring the implementation and compliance of our human rights commitments by ensuring our manufacturing facilities have completed and updated the Sedex Self-Assessment Questionnaire. This provides us the opportunity to review the processes and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>procedures in place that communicate and execute our global corporate policies and requirements. It also allows us to identify any potential gaps in implementation and share best practices throughout different regions and types of operations. As an added level of compliance verification we conduct SMETA 4-Pillar audits for select owned facilities to ensure proper implementation and execution of our internal operating procedures related to human rights.' No new relevant evidence found in latest Report. [Engagement Feedback, 09/08/2018 & Corporate Responsibility Report 2017/2018, May 2018]</p> <ul style="list-style-type: none"> • Met: Monitoring AG suppliers: In its 2018 CR Report the Company indicates: 'Our cross-functional team of leaders continues to meet monthly to review our monitoring and verification processes. We also use Sedex self-assessments and third-party audits to monitor our suppliers, and complete Sedex self-assessments for our own manufacturing facilities.' [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Describes corrective action process: Although the Company provided evidence related to the grievance mechanisms, no details found on corrective action process followed as general procedure for non-compliances found. [2018 FY Global Sustainable Palm Oil Milestone, 2019: crreport.kelloggcompany.com] • Not met: Example of corrective action • Met: Discloses % of AG supply chain monitored: The Company states that they 'actively monitor and report metrics for the top 80% spend of our suppliers. The remaining 20% is prioritized in terms of risk. Risk factors considered are prevalence of forced labor or child labor within the commodity supply chain, inherent regional risk of human rights issues, and salience of issues to operations. In 2017 91% of in-scope global direct suppliers were registered with the Sedex platform and 53% of in-scope direct suppliers had an up to date social audit available. In 2018, we also began tracking metrics globally for indirect suppliers.' [Progress Against Forced Labor: 2017, May 2018]
B.1.7	Engaging business relationships	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"> • Not met: HR affects AG selection of suppliers: The Company states in its Corporate Responsibility report that it requires the top 80% of its suppliers to join Sedex. It uses the audit information to verify whether suppliers are compliant with its Global Supplier Code of Conduct, containing details on HR standards to which suppliers must adhere. However, it is not clear whether this is a pre-selection requirement or only a monitoring tool. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com] • Met: HR affects on-going AG supplier relationships: The Company states in its Supplier Code that it 'reserves the right to terminate any agreement or business relationship in which a supplier does not comply with the Code.' In addition, in its 2018 Global Palm Oil Milestones, the Company indicates: 'When we are made aware violations of our policies, principles, or grievances within our supply chain we will work with suppliers to understand and take corrective actions. If concerns are not adequately addressed, or action and improvement are not forthcoming, we take action to have these entities removed from our supply chain.' [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com & 2018 FY Global Sustainable Palm Oil Milestone, 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com] • Not met: Working with AG suppliers to improve performance: The company state that "In partnership with our suppliers, we use industry-standard tools like Field to Market's Fieldprint® Calculator, the Cool Farm Tool, and Sustainable Agriculture Initiative's Farmer Self-Assessment to document continuous improvement [...]. However, it is not clear if this measures only refers to responsible sourcing of produce or this includes human rights issues. [Responsible Sourcing Annual Milestones 2018, 2019: crreport.kelloggcompany.com]
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems: The Company provides information related to stakeholder engagement within their sugar cane and organic apples operations. The Company describes multi-year projects with affected stakeholders in these two supply chains. [Progress Against Forced Labor: 2017, May 2018] • Not met: Frequency and triggers for engagement: In its 2018/2019 CR Report, the Company discloses information about engagement actions with stakeholders, where there is some information about frequency, however CHRB could not find

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>information about triggers for engagement. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com & Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com]</p> <ul style="list-style-type: none"> • Met: Communities in the AG SC engaged: In its Human Right Report 2018, the Company indicates: "In September 2018 Kellogg partnered with supplier Barry Callebaut to kick off a two-year pilot program aimed at remediating and mitigating the risks of child labour in the cocoa farming community of Bonsu Nkwanta, Ghana. The project consists of a package of interventions designed to provide educational support to the children of cocoa farming families, teacher support to local educators, farmer support, and community support. The pilot program design is predicated on the idea that to fight child labor holistic community wide solutions are required and that by supporting families and communities we can empower people with the resources they need to benefit from sustainable long-term change. Rather than quick fix solutions that do not address the root causes of these issues, the complexities and individualities of specific communities, and the needs of families we seek to affect lasting change and lay the foundation for future success.' [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Analysis of stakeholder views and company's actions on them: The Company discloses examples regarding engaging with stakeholders in the Sugar Cane and Organic Apples business. The Company discloses: 'Our work in sugar cane has involved developing and delivering training materials for Latin American cane workers in a jointly funded project facilitated by Solidaridad and Bonsucro, both of whom directly engaged with workers to assess and prioritize topics for targeted training materials. Our work with AIM-Progress peers and La Gloria Mill in Veracruz Mexico has been facilitated through ABC Mexico. We co-hosted and presented at the initial supplier capability building training workshop which was attended by worker representatives, supplier management, traders, refiners, NGOs, and 4 Mexican government Secretariats. The group discussed current needs and priorities for on the ground intervention and support. As a result of the engagement and training workshop, a project to improve access to water, rest, and shade for La Gloria Mill cutters was commissioned and has since begun. In 2015 we commissioned a report from Verisk Maplecroft to assess potential social and supply continuity risks to our organic green apple supply. In 2016, after determining that identified issues warranted further engagement, we partnered with our broker, primary supplier, and audit firm Control Union to conduct on-site assessments and interviews with farmers and seasonal workers to gather on the ground data regarding current or potential human rights risks. After reviewing the findings with the supplier and Control Union we supported the implementation of risk mitigation activities and policy enhancements by the supplier to remediate issues. In 2017, a second round of interviews and assessments were conducted to assess the results of those activities and the affect they had on workers and conditions.' [Progress Against Forced Labor: 2017, May 2018]

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	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company has disclosed to CHRB 'Kellogg utilizes similar metrics to assess risk within both owned and extended supply chain supplier operations. These risk factors include "regional location of operations, sector or commodity, degree of salience to industry identified issues, and supplier specific information". The Company also discloses ' For regional human rights risks, we reference a number of open source, regularly updated, subject matter expert publications such as the U.S Department of Labor ILAB, the Trafficking In Persons report from the U.S State Department, NGO and non-profit reports, industry and commodity specific guidance, and collaborative peer researched data. Through our involvement and participation in various industry and international stakeholder groups such as AIM-Progress, CGF, and the U.N. Global Compact, we are able to stay informed of situations that may affect the human rights landscape in various regions, sectors or commodities, and degree of salience to business operations.' [Engagement Feedback, 09/08/2018 & Progress Against Forced Labor: 2017, May 2018]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks in AG suppliers: Kellogg states that 'we utilize the online supplier management platform Sedex to identify, verify and manage risks within our supply chain. Based on these assessments, we are prioritizing our suppliers risk and engaging those that fall into higher risk categories. Those that continue to indicate high levels of risk are targeted for independent third-party social and ethical audits. ' The Company also states that "we use social and ethical compliance assessments of our own facilities to verify that Involuntary Labour does not exist within our own operations." and "in conjunction with the global risk analytics firm Verisk Maplecroft, Sedex uses hundreds of human rights indices to determine regional and sector specific levels of inherent risk. Based on these assessments, we are prioritizing our suppliers risk and engaging those that fall into higher risk categories. Those that continue to indicate high levels of risk are targeted for independent, third-party social and ethical audits." [Global Sustainability 2020 commitments, 42794] Score 2 • Met: Ongoing global risk identification: The Company has disclosed ' New business relationships, from new supplier engagement to joint ventures and acquisitions, are assessed in accordance with current human rights due diligence practices. Risk of actual or potential human rights issues are reviewed in relation to geographical location, type of production, commodity, or service, and level of risk associated with our most salient industry and operational issues. We also review workforce demographics for the presence of potentially vulnerable workers such as contracted or migrant employees. For high-risk operations or locations, we request further information through third-party audit compliance verification. ' [Engagement Feedback, 09/08/2018] • Not met: In consultation with stakeholders • Not met: In consultation with HR experts: The Company does not clarify that they do human rights risk assessments with human rights experts. The Company states that 'We also review workforce demographics for the presence of potentially vulnerable workers such as contracted or migrant employees. For high-risk operations or locations, we request further information through third-party audit compliance verification.' However, it is not clear whether this is human rights specific information. The Company does disclose in their Progress Against Forced Labour document that 'In 2015 we commissioned a report from Verisk Maplecroft to assess potential social and supply continuity risks to our organic green apple supply.' However, the Company does not describe the specific global systems in place to identify its human rights risks and impacts on a regular basis across its activities, in consultation with independent external human rights experts. [Progress Against Forced Labor: 2017, May 2018 & Engagement Feedback, 09/08/2018] • Met: Triggered by new circumstances: The Company has disclosed ' New business relationships, from new supplier engagement to joint ventures and acquisitions, are assessed in accordance with current human rights due diligence practices. [Engagement Feedback, 09/08/2018] • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company states " In conjunction with the global risk analytics firm Verisk Maplecroft, Sedex uses hundreds of human rights indices to determine regional and sector specific levels of inherent risk. Based on these assessments, we are prioritizing our suppliers risk and engaging those that fall into higher risk categories. Those that continue to indicate high levels of risk are targeted for independent, third-party social and ethical audits." [Human Rights Position Statement, Dec 2016] • Met: Public disclosure of salient risks: The Company also describes how they convene a cross-functional team comprised of Sustainability, Communications, Human Resources, Procurement, EHS, and Legal that meets monthly to assess and track the Company's global activities and inform policy and strategy regarding human rights. 'Each group is involved in decisions related to salient industry issues such as child labor, forced labor, freedom of association and collective bargaining, health and safety, land rights, water and sanitation, and women's rights.' [Progress Against Forced Labor: 2017, May 2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above.
B.2.3	Integrating and Acting: Integrating assessment	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: In its 2018 Human Rights Report, the Company discloses its Action Plan to face human rights issues, which includes the

Indicator Code	Indicator name	Score (out of 2)	Explanation
	findings internally and taking appropriate action		<p>following actions: 'OWN OPERATIONS: Continue SAQ gap analysis, and cross functional review for all owned manufacturing facilities; Develop a robust recruitment agency assessment program to ensure compliance and protection for contracted workers in our Asia Pacific facilities; Develop and implement internally initiated third party audit cadence for owned facilities to verify on site processes and review implementation procedures on a case by case basis. SUPPLY CHAIN: Continue our bi annual survey and supplier engagement programs for our high risk categories palm oil and sugar cane to understand supplier capabilities and status and look for collaborative opportunities; Continue to sponsor and coordinate on the ground supplier capability building; Partner with Elevate to reassess salient human rights risks and develop targeted engagement plans for supplier segments.'</p> <p>[Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com]</p> <ul style="list-style-type: none"> • Met: Including in AG supply chain: See above. In addition, an example of specific conclusions and actions related to a human rights issue that came about as a result of the risk mitigation process can be found in the Progress Against Forced Labour 2017 with the Organic Apples - Turkey section . This case study highlights how remediation efforts were triggered as a result of a risk assessment review of the area's organic apple supply chain. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org & Progress Against Forced Labor: 2017, May 2018] • Met: Example of Actions decided: The Company states "Should a critical violation of our policies, such as an incidence of Involuntary Labour, be reported or uncovered, Kellogg has an escalation procedure in place to ensure rapid response and immediate mitigation and remediation of the issue." and describes "The suspension of the RSPO certification of IOI Group on March 25 means that Loders Crokiaan is no longer in compliance with our palm oil policy and commitments. In January 2016, Kellogg began the process of removing this supplier from our supply chain. As of March, 67% of Loders volume has been transitioned to other suppliers in compliance with our policy. The remaining Loders volume (6% of global Kellogg palm usage) was transitioned over the next 90 days." No new relevant evidence in last year report. [Corporate Responsibility Report 2017/2018, May 2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: System to check if Actions are effective: The Company disclosed the following information to the CHRB: 'Tracking actions taken in response to human rights risks and impacts, including communication of outcomes and learnings and assessment of effectiveness, are conducted by the team that responded to the initial issue.- Issues raised through our Ethics and Compliance mechanisms are logged and tracked in a central location with resolutions and applied learnings. - Issues raised through global or regional Rapid Response Teams are handled directly by the team in conjunction with affected parties and internal stakeholders. Resolution and potential future implications are tracked and monitored. Policy or procedural changes, if warranted, undergo a global stakeholder review process. - Issues raised through the audit process are handled as follows: "Should a critical violation be uncovered during any of these processes Kellogg has a Critical Response Action Plan to alert senior executives and assess plans for immediate remediation of the issue(s). These are reviewed on a case-by-case basis and next steps executed accordingly, relevant to risk to affected people, communities, and business operations. Non-critical violations are managed through the supplier and the third-party audit body. Tracking of resolution of these issues is done through Sedex and internal Kellogg systems with the expectation that suppliers complete the Corrective Action Plan requirements agreed to during the audit," Sustainability Milestones 2016, pg. 34.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] • Met: Lessons learnt from checking effectiveness: The Company discloses in their Progress Against Forced Labour document 'Complaints and inquiries are assigned to regional compliance leads for review and resolution, consistent with our investigation protocols. Most investigations can be completed quickly. Our goal is to complete investigations within 30 days. However, completion timelines may vary depending upon additional factors such as the availability of witnesses, etc. Appropriate action is taken, based on investigation findings. Lessons learned are leveraged to prevent and detect future misconduct, ensure compliance, and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>identify any other opportunities for improvement' [Progress Against Forced Labor: 2017, May 2018]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: As above.
B.2.5	Communicating : Accounting for how human rights impacts are addressed	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: The Company disclosed to CHRB 'Kellogg communicates the actions and outcomes of remediation efforts in relation to human rights impacts externally through various reports and public inquiry responses. To comply with legislative requirements such as the UKMSA and CTSCA, Kellogg issues the Progress Against Forced Labor Milestones, an annual performance report detailing actions and results of activities related to salient human rights issues such as forced labor. Commodity specific actions and results can also be found in annual reporting documents such as the Responsible Sourcing Milestones and Palm Oil Milestones. For an overview of our responsible sourcing program and commitments, we issue our annual Corporate Responsibility Report for external stakeholders, consumers, and investors. In addition, we also participate in a number of external public benchmarking surveys.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] • Met: Comms plan re assessing risks: The Company has communicated that it has a system to assess which are its human rights issues, including a disclosure of these (see B.2.2). [Progress Against Forced Labor: 2017, May 2018] • Met: Comms plan re action plans for risks: The Company communicates its Action Plan to face human rights issues in own operation and in its supply chain in its latest Human Rights Report. See indicator B.2.3 [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] • Met: Comms plan re reviewing action plans: The Company has communicated that it has a system to track actions taken in response to human rights risks and impacts, and evaluating whether the actions have been effective. It communicates examples of lessons learned (see B.2.4). [Progress Against Forced Labor: 2017, May 2018 & Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] • Met: Including AG suppliers: See indicators B.2.1 - B.2.4. In addition, the Company indicates in its 2018 Human Rights Report: ' We remain committed to further expanding our efforts to increase visibility and transparency into the lower tiers of our highest risk areas and commodities. We will also seek ways to better partner with our suppliers to ensure that all within our value chain operate in accordance with our policies and requirements and provide guidance those that need to improve or remove those that fail to meet expectations of engagement. [...]. We will continue increasing our efforts, through robust policies and procedures to ensure the fair and appropriate representation of all affected stakeholders.' [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Responding to affected stakeholders concerns: The Company details examples of responses to specific human rights concerns raised by, or on behalf of, affected stakeholders and subsequent communication processes in the Kellogg Global Palm Milestones January to June 2017. [H1 2017 Global Sustainable Palm Oil Milestones, 06/07/2017: crreport.kelloggcompany.com] • Not met: Ensuring affected stakeholders can access communications

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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: In accordance with the Company Code of Ethics, reports can be made to Office of Ethics and Compliance via several different procedures. In addition, it has Ethics Alertline which is maintained by a third-party confidential reporting company. Office of Ethics and Compliance then receive reports from the company for investigation and follow-up. Calls are answered in local languages. [Code of ethics, Sep 2013]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: The Company discloses information about its grievance channels: its Ethics Hotline and MyHR Portal. In its Ethics Hot line, the Company received 174 complaints (none of Forced Labor) and in MyHR Portal it received 311 complaints (141 related to human rights issues, none of them about Forced Labor). It also reports that it closed 153 complaints from its Ethics Hot line and substantiated 20 cases. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] • Met: Channel is available in all appropriate languages: It also indicates in its Human Rights report that its 'Hot Line is operated for Kellogg by a third party, confidential reporting company and always available to over 30,000 Kellogg employees in 18 countries in the caller's local language'. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] • Met: Expect AG supplier to have equivalent grievance systems: Regarding supplier specific requirements, as stated in the Global Supplier Code of Conduct, "Suppliers shall provide means for confidential complaint/concern reporting to all Employees, taking into consideration the best practice guidelines highlighted in the UN Guiding Principles. Issues should be addressed in a timely and respectful manner and include documentation of corrective actions. In addition to this, we encourage Suppliers to communicate the availability of Kellogg Company's ethics hotline as a way for Employees throughout our collective supply chain to report grievances." [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Not met: Opens own system to AG supplier workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: The Company states in its Supplier Code that 'any Supplier who has a product safety concern or who believes that an employee of Kellogg, or anyone acting on our behalf, has engaged in illegal, unethical or otherwise improper conduct, must immediately report the matter to our Office of Ethics and Compliance. However, there is no reference to external stakeholders, such as communities. The Human rights milestones report also refers to the ethics hotline as a 'confidential way for employees, suppliers and contractors to ask questions and report concerns in relation to ethics, compliance or any other requirements in our code'. No evidence found in the code of ethics in relation to the mechanism being open to all external individuals and communities who may be adversely impacted'. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com & Code of ethics, Sep 2013] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: Country and language specific accessibility is provided for all countries of operations. Local numbers can be accessed through the Global Ethics and Kellogg Alterline homepage. However, as indicated above, no evidence found of the grievance mechanisms being open to external stakeholders and communities. [Kellogg's Company website, 43229: kelloggcompany.com] • Not met: Expects AG supplier to have community grievance systems: The supplier code indicates that 'suppliers shall provide means for confidential complaint/concern reporting to all Employees, taking into consideration the best practice guidelines highlighted in the UN Guiding Principles'. However, no evidence found of the Company expecting suppliers to have the mechanism open to all external stakeholders. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Not met: AG supplier communities use global system: Ethics hotline is open for Company's employees, suppliers and contractors. However, it is not clear whether is open also to all suppliers potentially affected external stakeholders. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages users to create or assess system: In 2018-2019 the Company reports that they have used the 'Continue Regional Partnership to identify and implement opportunities for improvement and explore pathways to promote the Hot Line beyond our employees and contractors.' [Progress Against Forced Labor: 2017, May 2018] • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Response timescales: The Company indicates in its Human Rights Report 2018: 'Complaints and inquiries are assigned to regional compliance leads for review and resolution, consistent with our investigation protocols. Most investigations can be completed quickly. Our goal is to complete investigations within 30 days. However, completion timelines may vary depending upon additional factors such as the availability of witnesses , etc. Appropriate action etc. Appropriate action is taken, based on investigation findings.' [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company discloses 'Should a critical violation be uncovered during any of these processes Kellogg has a Critical Response Action Plan to alert senior executives and assess plans for immediate remediation of the issue(s). These are reviewed on a case by case basis and next steps executed accordingly relevant to risk to affected people, communities, and business operations.' However, this is disclosed in relation to their SMETA Audit system, and not with reference to internal or external complainants utilising the Company grievance mechanisms. No new relevant evidence found in last year report. [2016 Year-End Sustainability Milestones, 2016: kelloggcompany.com]
C.5	Commitment to non-retaliation over complaints or concerns made	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company states in its Code of Ethics that 'we support honest and open communication and encourage our employees to ask questions and report concerns. We will not tolerate retaliation against any individual who, in good faith, discloses any actual or suspected violations or participates in a Kellogg investigation. Retaliation will result in disciplinary action up to and including termination of employment.' [Code of ethics, Sep 2013] • Met: Practical measures to prevent retaliation <p>Score 2</p> <ul style="list-style-type: none"> • Met: Has not retaliated in practice: The Company has disclosed to CHRB 'Kellogg has never brought a retaliatory suit against persons who have brought, or tried to bring, a case against Kellogg involving credible allegation(s) of adverse human rights impacts or against the lawyers representing them (retaliatory civil litigation, including for defamation, filing criminal complaints, or any similar actions against claimants or their lawyers), or fired any workers who have brought, or tried to bring, a case against Kellogg involving an allegation of human rights abuse, or engaged in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] • Met: Expects AG suppliers to prohibit retaliation: In the Global Supplier Code of Conduct, Kellogg requires that 'Suppliers shall not engage in any form of retaliation including threats, intimidation, physical, or legal attacks against human or environmental rights defenders, or those exercising their rights to freedom of expression, association, peaceful assembly, or protest against the business or its operations.' [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company also describes 'In addition to decreasing exposure to Indofood, we can confirm that our exposure to the company REPSA has been eliminated as a result of the actions taken by our suppliers. All major suppliers have suspended future business until current issues have been effectively and acceptably remediated and a comprehensive action plan put in place to ensure the protection and respect of all workers and their representatives'. However other than eliminating exposure from these operations, it is not clear how the company has remediated any actual human rights grievances

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>(e.g. potentially affected community members/stakeholders). [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org & H1 2017 Global Sustainable Palm Oil Milestones, 06/07/2017: crreport.kelloggcompany.com]</p> <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks: The Company discloses to the CHRB 'At Kellogg, the process for providing or enabling timely remedy for victims of adverse human rights impacts is "to complete investigations within 30 days. However, completion timelines may vary depending upon additional factors such as the availability of witnesses, etc. Appropriate action is taken, based on investigation findings. Lessons learned are leveraged to prevent and detect future misconduct, ensure compliance, and identify any other opportunities for improvement.' However, this is just the process for the grievance mechanism, and does not detail how remedy is provided. [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • 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"> • Not met: Living wage in supplier code or contracts: Despite the Company state in its Supplier Code that "suppliers must provide fair compensation in compliance with all applicable wage and hour laws, rules and regulations. Suppliers must provide for reasonable working hours, including maximum work hours, overtime, vacation time, leave periods, and public holidays". However there is no reference to living wage expectations and the reference to compensation being 'in compliance with all applicable wage and hour laws' is not sufficient. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with 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"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Met: Positive incentives to respect human rights (purchasing practices): The Company discloses "In addition to monitoring our supply chain, we also recognize suppliers who have gone above and beyond to help champion Kellogg's responsible sourcing commitments. This year our Kellogg North America Procurement team awarded both Graphic Packaging International and Star of the West with our Supplier Sustainability Partnership award for their work in Packaging and Ingredients. Both companies have been instrumental in their efforts to collaborate and proactively seek out ways to support initiatives and programs related to Kellogg's 2020 Sustainability Commitments. " No new relevant evidence found in last year report. [2016 Year-End Sustainability Milestones, 2016: kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields): The Company states in its Smallholder Farmers And Women Impact Assessment that 'Based on actual Kellogg sourcing volumes and locations, as well as discussions with procurement team members and suppliers, TechnoServe estimated that Kellogg supports 65,000 smallholder farmer livelihoods across 10 of our ingredients which include wheat, corn, rice, potato, fruit (berries and raisins/sultanas), palm oil, cocoa, honey and vanilla'. In addition, in its Responsible Sourcing Milestone 2018, the Company discloses information about different programs/initiatives where it has engaged with farmers for its ten priority ingredients. However, these details seem focused in supporting smallholders rather than describing how it identifies and maps direct and indirect suppliers. [Kellogg's Company website, 43229: kelloggcompany.com & Responsible Sourcing Annual Milestones 2018, 2019: crreport.kelloggcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: Discloses significant parts of SP and why: The Company has disclosed the names of all direct suppliers and the names and locations of all palm oil plantation sources. The Company identifies palm oil as being one of their highest risk categories. The Company stated in their 2017 H1 Global Sustainable Palm Oil Milestones 'To fully support ongoing collective efforts to increase transparency and accountability within the palm oil industry, we are releasing our full 2017 mill list. This list includes mills which may be part of the Kellogg extended supply chain due to RSPO Mass Balance purchases of palm oil.' Furthermore in this report the company has described 'Palm oil continues to be an ingredient of particular focus for Kellogg Company in our responsible sourcing efforts. Palm oil is grown and produced in Southeast Asia and is widely used in foods, soaps and cosmetics. The rapid expansion of palm oil production has been associated with human rights violations and the destruction of tropical forest habitats and peat lands.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org & H1 2017 Global Sustainable Palm Oil Milestones, 06/07/2017: crreport.kelloggcompany.com]
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Child Labour rules in codes or contracts: The Global Supplier Code of Conduct states 'Suppliers shall not employ anyone under the age of 15, under the minimum age of work, or under the minimum age for completing mandatory schooling as specified by local law. Suppliers must follow the higher law/requirement in instances where there is a contradiction. Suppliers shall comply with ILO Convention 138 on the Minimum Age for Admission to Employment and Work, and Convention 182 on the Elimination of the Worst Forms of Child Labour. Exceptions are subject to those allowed under national law and outlined by the ILO. Per the ILO, any work that is likely to jeopardize children's safety or physical, mental, or moral health should not be done by anyone under the age of 18'. In addition, the Company carries out third party audits through SEDEX's SMETA, which includes age verification. No evidence found, however, of requiring remediation programmes in case child labour is found. [Kellogg's Company website, 43229: kelloggcompany.com & Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] Met: How working with suppliers on child labour: In their Progress Against Forced Labour Milestones document the Company describes how they are working together to reduce child labour in their sugar cane and organic apples (turkey) supply chain. For example, the Company describes how in Latin America Kellogg was part of a stakeholder group with Solidaridad and Bonscuro to improve labour conditions in the sugar cane supply chain. They partnered together to develop training materials which will reach approximately 25,000 workers for 2017/2018 and help address concerns of child labour. [Progress Against Forced Labor: 2017, May 2018] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met: As indicated above, no evidence found of remediation programmes requirement for suppliers. [Progress Against Forced Labor: 2017, May 2018] Met: Analysis of trends in progress made: The Company reports annually on their progress against forced labour. This reporting covers trends relating to child labour amongst their supply chain - and specifically details information with regards to the organic apples (turkey) and sugar cane supply chain. [Progress Against Forced Labor: 2017, May 2018]
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Debt and fees rules in codes or contracts: The Company states in their Global Supplier Code of Conduct 'Suppliers must follow the "Employer Pays Principle" and adhere to the tenet of the Priority Industry Principles that "No worker should pay for a job". Employees shall not pay any fees or costs to the Supplier, Labour Agent/Agency, or any other third party associated with recruitment. Examples of fees and costs include, but are not limited to, legal fees, travel, lodging, passport and visa processing, medical exams, in-country support services, personal protective equipment, and training.' [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: In the Company's Progress Against Forced Labour Report the Company, the Company details how after a Verisk Maplecroft assessment of exposure in their organic apples supply chain in Turkey it determined 'more investigation was needed regarding issues of migrant worker rights, forced labour, debt bondage, child labour, wages and working hours.' The Company details how they have engaged with suppliers (with the help of Control Union) which has resulted in suppliers improving annual training and implementing best practices to address these issues among its farmers and their workers. [Progress Against Forced Labor: 2017, May 2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above. • Met: Analysis of trends in progress made: The Company's Progress Against Forced Labour Report provides two in depth detailed case studies - regarding their sugar can and organic apples (turkey) supply chain. These case studies include information as to how suppliers processes with regards to forced labour are improving. [Progress Against Forced Labor: 2017, May 2018]
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"> • Met: Free movement rules in codes or contracts: The Global Supplier Code of Conduct states 'Suppliers must not restrict Employees' freedom of movement through confining, imprisoning, or detention during or outside of work hours at any location, including worksites or Employee residences in accordance with the Priority Industry Principles' tenet that "Every worker should have freedom of movement". Suppliers shall not withhold, or keep in their possession, any Employee documents or items, including passports, identity papers, jewellery, ATM cards, or land deeds. All efforts should be made to provide Employees with safe and secure locations to keep such items, which they may access at any time without notification to, or intrusion from, any other individuals.' [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Not met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
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"> • Not met: FoA & CB rules in codes or contracts: The Global Supplier Code of Conduct states that 'Suppliers must respect the rights of their Employees to freely associate, organize, and bargain collectively, where allowed by law. Employees, or their representatives, shall be allowed to openly communicate with management regarding working conditions or management practices without fear of discrimination, reprisal, retaliation, intimidation, or harassment.' However, no evidence found in relation alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
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"> • Met: Sets out clear Health and Safety requirements: The Company sets out clear health and safety requirements in the 'Quality, Health & Safety' section of the Global Supplier Code of Conduct. This covers product quality and safety, the work environment (covering potable drinking water and adequate sanitation), occupational safety, housing and emergency preparedness. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Not met: Injury Rate disclosures: In its Corporate Responsibility Report, the Company discloses figures about its Total Recordable Incident Rate for the last five years (2018: 0,57). However, it is not clear if it includes information of suppliers' workers. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com] • Not met: Lost days or near miss disclosures: In its Corporate Responsibility Report, the Company discloses figures about its Lost Time Incident Rate for the last five years (2018: 0,30). However, it is not clear if it includes information of suppliers' workers. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Fatalities disclosure

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: In its 'Responsible Sourcing Annual Milestone 2018' document, the Company indicates: 'Continued participation in an industry group led project to improve cane cutter working conditions in the Veracruz region of Mexico through improvements to water, rest, and shade. With peer collaborators, industry group AIM Progress , La Gloria Mill , and implementation coordinators ABC Mexico , the project built shade shelter tents, increased access to potable water, provided additional personal protection equipment, and facilitated workers best practice training.' [Responsible Sourcing Annual Milestones 2018, 2019: crreport.kelloggcompany.com] • Not met: Provides analysis of trends demonstrating progress: In its 2018/2019 CR Report, the Company states: 'We are proud that our global Total Recordable Incident Rate (TRIR) dropped 26 percent to 0.57 and our global Lost Time Incident Rate (LTIR) dropped 14 percent to 0.30. Both rates are the lowest in our company's history and significantly below the U.S. Bureau of Labor Statistics industry benchmarks of 4.7 and 1.3, respectively. In 2018, we put special emphasis on enhanced training to further reduce hand and finger injuries across our manufacturing facilities. As a result, hand injuries were reduced by 48 percent globally.' However, the analysis focus on own employees, and does not cover suppliers' workers. [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com]
D.1.8.b	Land rights: Land acquisition (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Rules on land & owners in codes or contracts: The Company states in its Global Supplier Code of Conduct that 'suppliers must respect the land rights of women and communities affected by their operations and sourcing practices, and must ensure transparent reporting and disclosure of concession agreements and/or operating permits to affected communities. Suppliers must ensure fair negotiation on land transfers and must refrain from cooperating with any host government's illegitimate use of eminent domain to acquire land that will be used to provide products and services to Kellogg, adhering to the principle of Free, Prior and Informed Consent. Suppliers must identify small-scale producers to ensure they have access to fair market value for their crops, goods or services'. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Rules on water stewardship in codes or contracts: The Company states in its Global Supplier Code of Conduct that "Suppliers must provide their Employees with safe working conditions including potable drinking water, adequate sanitation, safety equipment essential for their duties, suitable facilities for women's health needs, protection from exposure to toxic or harmful chemicals (both use and storage), structurally sound facilities with safe and unrestricted ingress and egress, etc. Suppliers should document, investigate and report to the appropriate authorities any incidents which result in injury to an Employee beyond first aid. When living conditions are provided, they must be clean, safe, adequate, unrestricted and promote basic human dignity. "The Company states that 'FAO/AQUASTAT and the Water Footprint Network are used to assess several key ingredient suppliers and associated water-related business risks, overlaying our supply source locations against global water stress maps and renewable water supply projections. This includes work with the University of Minnesota Institute on the Environment to create water and climate risk maps globally for specific ingredient sourcing locations'. [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Met: How working with suppliers on water stewardship issues: The Company describes how 'Kellogg is taking part in an industry group led on-the-ground project to improve cane cutter working conditions in the Veracruz region of Mexico through improvements to water, rest, and shade. We have partnered with peer companies, industry-group AIM-Progress, La Gloria Mill, and implementation coordinators ABC Mexico to build field shade shelter tents, increase access to potable water, provide additional PPE, and facilitate training for workers to learn best practices. This project will directly impact 2,100 field workers and indirectly impact over 4,000.' [Progress Against Forced Labor: 2017, May 2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights in codes or contracts: The Company states in its Global Supplier Code of Conduct that "Suppliers must make employment decisions including hiring, payment, benefits, advancement, termination and retirement based on ability, qualifications and achievements and not on any personal characteristics. Suppliers must demonstrate that women and men with similar ability, qualifications and achievements are afforded similar work opportunities, wages, benefits, contract terms, and facilities." Additionally it states in its Sustainability Milestones that it "recognizes that women often play a significant role in agriculture, but in some countries still face challenges of injustice and inequality. Kellogg is identifying the parts of our supply chain with the highest prevalence of women, while identifying the risks and opportunities they face, depending on their communities and regions. We recognize the importance of communities' right to access and control of land, especially the land that enables food security." [Global Supplier Code of Conduct, Jun 2018: crreport.kelloggcompany.com] • Met: How working with suppliers on women's rights: The Company has described 'Kellogg is committed to supporting women rights and empowerment in our supply chain operations. We have made the commitment that "by 2020, develop programs to help women farmers/workers improve their livelihoods, families and communities using climate-smart agriculture practices". To date, Kellogg has been able to support more than 10,000 women smallholders through various programs and initiatives.' [Kellogg CHRB Disclosure: Additional Information, 25/07/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above. • Not met: Provides analysis of trends demonstrating progress: The Company disclosed to the CHRB 'To formulate the metrics that we use to measure progress against our commitments to improve livelihoods and support the empowerment of women in our supply chain, particularly smallholder farmers, Kellogg assessed the number of women farmers in our priority supply chains and mapped the risks that they face related to economic, social, and environmental issues. This information can be found in our Smallholder Farmers and Women Impact Report.' The Smallholder Farmers and Women Impact Report includes an analysis of trends among suppliers, however the reference is outdated, no new evidence found in last years reports. [Smallholder Farmers and Women Impact Report, February 2015: crreport.kelloggcompany.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Kellogg faces social allegations over its palm oil sourcing in Indonesia • Area: Child labour / Forced labour • Story: On November 30th 2016, Amnesty International published a report in which it accused Wilmar and Wilmar's major clients including Unilever, Kellogg's, Reckitt Benckiser, Colgate-Palmolive and Nestlé of human rights violations in its palm oil supply chain processes in Indonesia. These companies are alleged to have been complicit in the use of child labour and forced labour, with workers subjected to poor working conditions. They are also accused of contributing to deforestation and the extinction of rare species in Indonesia, endangering workers' health through exposure to dangerous chemical herbicides and failing to provide safety equipment. In addition, labourers allegedly work for around 10 to 11 hours a day without adequate pay, while children allegedly work from the age of eight. Amnesty vowed to conduct a campaign to ask if the companies' products are issued from Wilmar activities in Indonesia. <p>In March 2017, Amnesty repeated its accusations claiming the situation had not been resolved and alleging that Wilmar was continuing to intimidate workers to prevent them from speaking out.</p> <ul style="list-style-type: none"> • Sources: [Forbes - 30/11/2016 -: forbes.com][Amnesty International report, 2016 -: amnesty.org.uk][Company website -: crreport.kelloggcompany.com][Amnesty International - 30/11/2016: amnesty.org]
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Response goes into detail: The Company reports in a detailed way on its position to the case. It cited 'traceability' as a factor in why they had not been aware of abuses at the plantations supplying them palm oil through Wilmar. In its 'Milestones' 2017 Report on palm oil, Kellogg indicated that: 'We recognize the ongoing challenges associated with deforestation and peatland development and the necessity to uphold and protect the rights of workers and indigenous people'. It has also published a list of suppliers.
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> Met: Policies address the specific rights in question: In its global supplier code of conduct, the Company expects suppliers to respect rights related child labour and forced labour. It states 'Suppliers may only utilize child labor that is permitted by International Labour Organization guidelines. Hazardous work may not be done by anyone below the age of 18 and such individuals must provide documented informed consent' and 'Suppliers must not use or facilitate any type of involuntary labor, including forced, indentured, bonded, slave or human trafficked labor. Suppliers may use Employees in an official government prison rehabilitation program'.
E(1).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Engages with affected stakeholders: The company says in its 2018 Human Rights Milestones report it was involved in a series of supplier workshops, where approximately 170 persons from Wilmar's supplier companies participated in the 3 workshops held over 7 months in Medan, Pekanbaru, and Jakarta, Indonesia. The speakers included representatives from government, unions, civil society, business organizations, buyers and plantations. The topics of engagement included external stakeholder concerns and expectations (supported by Amnesty International material and Better Work Indonesia), labour laws, child labour and grievance mechanisms among others. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] Not met: Encourages linked business to engage affected stakeholders: The company in its 2018 Human Rights Milestones report says "Kellogg participated in the Jakarta workshop to directly communicate our approach to sustainability, relevant policies, and expectations of our suppliers and associated upstream supply chains." However it is not clear whether the company encouraged those suppliers to engage with those affected workers in the Amnesty International report. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] Not met: Provides remedies to affected stakeholders: There is no publicly available evidence that remedy has been provided to those affected workers referenced in the Amnesty International report. Met: Has reviewed management systems to prevent recurrence: In its 'Milestones' 2017 Report on palm oil, Kellogg has provided examples on actions it has taken to improve the traceability of palm oil and in particular with Wilmar. For example, they have signed an agreement with Wilmar and BSR to conduct small- and medium-scale supplier training workshops (retro-active to November workshop), focused on addressing and mitigating labour issues, wages, employment status and grievances. In addition Kellogg's has taken other steps such as piloting a 'tool to measure and assess worker well-being at a palm oil processing facility through direct worker feedback using mobile technology' and published 'Progress Against Forced Labor Milestones report on the worker voice survey with four suppliers, one of which was a Kellogg palm oil supplier in Indonesia'. In its response to Amnesty International, Wilmar has indicated that 'in addition to the supplier compliance work and ART programme with our collaborative partner The Forest Trust (TFT), as well as the supply chain surveillance work by an international NGO partner on more than 40 palm oil companies at plantation, mill or group level, our grievance procedure is the other platform used to identify, address and monitor potential supply chain non-compliance'. [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Remedies are satisfactory to the victims: There is no publicly available evidence that remedy has been provided to the victims. Met: Has improved systems and engaged affected stakeholders: The company says in its 2018 Human Rights Milestones report that it will undertake an action plan which includes. "Continue SAQ gap analysis, and cross-functional review for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			all owned manufacturing facilities, Develop a robust recruitment agency assessment program to ensure compliance and protection for contracted workers in our Asia Pacific facilities, Develop and implement internally initiated third-party audit cadence for owned facilities to verify on site processes and review implementation procedures on a case by case basis, Continue our bi-annual survey and supplier engagement programs for our high risk categories palm oil and sugar cane to understand supplier capabilities and status and look for collaborative opportunities, Partner with Elevate to reassess salient human rights risks and develop targeted engagement plans for supplier segments" [Human Rights Report 2018, Jun 2019: crreport.kelloggcompany.com]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.43 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Kellogg made data public that met one or more elements of the methodology in 36 cases, leading to a disclosure score of 3.43 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Met: Company reports on GRI: The Company states in its 2018/2019 Corporate Responsibility Report: 'This report has been prepared using the Global Reporting Initiative (GRI) and Food Processing Sector Standards, plus the Sustainability Accounting Standards Board (SASB) Processed Foods Standards. We are reporting in accordance with GRI's "Core" option and have also included additional information addressing some "Comprehensive" reporting disclosures. Kellogg Company's most recent full GRI-based Corporate Responsibility Report was published in 2018.' [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com & 2018 GRI Index, 2018: filecache.mediaroom.com] Met: Company reports on SASB: See above [Corporate Responsibility Report 2018/2019, Jun 2019: crreport.kelloggcompany.com]
F.3	Key, High Quality Disclosures	1.5 out of 4	Kellogg met 3 of the 8 thresholds listed below and therefore gets 1.5 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> Met: Score 2 for A.2.2 : Board discussions Not met: Score 2 for B.1.6 : Monitoring and corrective actions Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> Met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> Not met: Score 2 for A.2.3 : Incentives and performance management Not met: Score 2 for B.1.2 : Incentives and performance management

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.

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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.