

Company Name Kraft Heinz
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 10.7 out of 100

Theme Score	Out of	For Theme
2.4	10	A. Governance and Policies
1.4	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
0.0	20	D. Performance: Company Human Rights Practices
2.1	20	E. Performance: Responses to Serious Allegations
1.1	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states 'we are committed to respecting human rights in our own operations and throughout our global value chain.' [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Not met: UNGC principles 1 & 2 Not met: UDHR Not met: International Bill of Rights Score 2 <ul style="list-style-type: none"> Not met: UNGPs: The Company states that its Human Rights Policy is 'guided by' the UNGPs. However, this language is not enough to be considered a commitment. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: ILO Core: The Company explicitly lists the ILO Core for both itself and its suppliers. See below. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Met: Explicitly list All four ILO for AG suppliers: The Company adheres to and expects its suppliers and other business partners to adhere to the following: 'Minimum Age for Employment [...] We do not tolerate the use of child labor [...] Forced Labor – we do not tolerate the use of forced or involuntary prison labor [...] Discrimination – we prohibit discrimination on the basis of inequalities including race, ethnicity, sex, language, religion, political or other opinion, national or social

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			<p>origin, property and birth or other legally-protected status [...] Freedom of Association – we recognize and respect the rights to freedom of association and collective bargaining'. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As stated above, the Company adheres to the ILO core labour standards, including Freedom of Association: 'we recognize and respect the rights to freedom of association and collective bargaining'. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Met: Respect H&S of workers: The company state "we prioritize safety in our workplace. Wherever we are, safety must always come first. We are committed to providing a safe and healthy workplace for all of our employees. As part of this commitment, all facilities must comply with workplace safety laws. Employees are expected to perform their duties in a safe manner at all times, including wearing the appropriate gear, operating machinery only according to instructions, and taking appropriate action when a safety hazard arises. [Employee code of conduct: kraftheinzcompany.com] • Not met: H&S applies to AG suppliers: It is not clear if the company's H&S commitment also applies to suppliers. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Respect land ownership and natural resources: The Company respects free, prior and informed consent. See below. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Met: Expecting suppliers to respect these rights: The Company states the following in relation to land rights: 'we adhere to the principle of free, prior and informed consent (FPIC). We follow all applicable laws relating to the rights of land and natural resources'. The Company expects the same from its business partners. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC for all: The Company states the following in relation to land rights: 'we adhere to the principle of free, prior and informed consent (FPIC). We follow all applicable laws relating to the rights of land and natural resources'. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Respecting the right to water: See above. • Not met: Expecting suppliers to respect these rights: See above.
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people's rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights: The Company states it seeks 'to respect human rights across [its] global operations and supply chain, which is represented by hundreds of thousands of stakeholders, including but not limited to [...] rights holders such as the following: foreign and migrant workers, women, children, indigenous populations, minorities and people with disabilities.' However, it is not clear if the company has a commitment to women's rights throughout its operations. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Children's rights: See above. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Migrant worker's rights: See above. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Expects suppliers to respect these rights: The Company states the following: 'We are committed to working with our business partners to respect human rights and expect them to adhere to the internationally-recognized standards outlined in this Policy.' However, its unclear if suppliers are expected to respect these rights. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement: The Human Rights policy states that 'We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk'. These include potentially affected stakeholders: 'the CSR Team engages with key stakeholders regularly, including consumers, customers, shareholders,

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			employees, NGOs and community leaders.' However, no evidence of regular stakeholder engagement found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com & Corporate responsibility report, 2017: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy: 'We are committed to addressing any adverse human rights impacts which we have caused or to which we have contributed, and expect our suppliers, business partners and other relevant stakeholders to do the same.' However, this language is not enough to be considered a commitment [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Score 2 <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
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): In regards to use of its Grievance Mechanism, the company states it does 'not tolerate retaliation and anonymity is guaranteed.' However, no commitment to zero attacks on human rights defenders could be found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: 'This [Human Rights] Policy and all statements herein – including any recommended changes or updates – are (or, as applicable, must be) approved by the Kraft Heinz Board of Directors and Chief Executive Officer, Bernardo Hees.' [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Met: Board level responsibility for HRs: The Corporate responsibility report states that 'the Board of Directors helps establish and oversee our global CSR objectives and framework, including matters related to our supply chain, the environment, nutrition and well-being, and social issues. Members review all significant policies, processes and commitments and receive frequent updates from the CSR team on progress against key performance indicators and other relevant developments'. [Corporate responsibility report, 2017: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: The Company state that 'the senior leaders within the Global Steering Group have performance incentives linked to successful implementation and governance of the company's Human Rights Policy. However, the people involved in the committee are not part of the Board, which is required for this indicator. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Not met: At least one key AG HR risk, beyond employee H&S • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions • Met: Senior responsibility for HR: Regarding Administrative and Governance in the Human Rights Policy, the Company states the following: 'Relevant members of the Kraft Heinz Executive Management team oversee implementation of this Policy. A Global Steering Group – including the Head of Corporate Social Responsibility, the Chief Procurement Officer and the Chief Ethics and Compliance Officer – monitors compliance with this Policy and developments within the industry.' [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: The Global Steering Group is 'also responsible for day-to-day monitoring, supervising, administration and updating of this Policy.' However, it is not clear how the steering group work within their functions to implement and/or supervise human rights issues. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Day-to-day responsibility for AG in supply chain: The Company states the following regarding tracking: 'We track the effectiveness of our management of negative human rights impacts through the monitoring of and engagement with our suppliers, business partners and other relevant stakeholders'. However, it is unclear who is responsible for this. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: 'The senior leaders within the Global Steering Group have performance incentives linked to successful implementation and governance of this [Human Rights] Policy.' The policy goes beyond the ILO core. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: At least one key AG HR risk, beyond employee H&S • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: 'We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk, including [...] relevant internal and external risk management systems'. However, it is unclear whether these include the broader enterprise risk management systems. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Company has disclosed it is currently undergoing a third party assessment. However, no public document providing a description of this could be found, nor does it seem to have happened in the last reporting year.
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Commits to ILO core conventions • Met: Communicates its policy to all workers in own operations: 'We actively communicate the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement. The Policy is public via the Kraft Heinz Corporate Website and within our internal Kraft Heinz Policy Center, housed on an intranet platform. When needed, local translation is provided'. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions • Met: Communication of policy commitments to stakeholder: See above. In addition, the company state that 'when needed' local translation is provided'. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • 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	<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 all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole AG supply chain: 'We actively communicate the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement. The Policy is public via the Kraft Heinz Corporate Website and within our internal Kraft Heinz Policy Center, housed on an intranet platform. When needed, local translation is provided'. However, it is unclear whether this policy is communicated down the supply chain. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Requiring AG suppliers to communicate policy down the chain • Not met: How HR commitments made binding/contractual: The Supplier Guiding Principles are 'incorporated into all new or renewed commercial agreements between suppliers and Kraft Heinz, its affiliates and business units.' However, this does not include the right to collective bargaining. [Supplier guiding principles: kraftheinzcompany.com] • Not met: Including on AG suppliers
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: 'We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk, including...training protocols and the implementation of several global policies'. However, it is unclear who is trained. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Trains relevant AG managers including procurement • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company discloses the following: 'We track the effectiveness of our management of negative human rights impacts through the monitoring of and engagement with our suppliers, business partners and other relevant stakeholders [regarding compliance with the Human Rights Guiding Principles set forth in this Policy].' However, this seems to be part of a general due diligence system and it is not clear the percentage of the supply chain monitored. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Monitoring AG suppliers • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects AG selection of suppliers: The Company expects suppliers to comply with its Global Human Rights Policy, and the Supplier Guiding Principles are incorporated into contracts, however, no description of how human rights performance is taken into account to select or renew suppliers. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com & Supplier guiding principles: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: HR affects on-going AG supplier relationships • Not met: Both requirement under score 1 met • Not met: Working with AG suppliers to improve performance: The Company has disclosed that it is currently undergoing an assessment, however, no description or results of this could be found.
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company actively communicates 'the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement.' However, no description of how it has

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>identified and engaged with stakeholders or the frequency and triggers for engagement could be found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]</p> <ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement • Not met: Workers in AG SC engaged • Not met: Communities in the AG SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: While the Company has disclosed it is currently undergoing an assessment, no results related to stakeholder views have been published.

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	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: Identifying risks in own operations: The Company states the following: 'We undertake both internal and external practices to assess potential negative human rights impacts in our business operations and global supply chain. [...] Our efforts include conducting a risk assessment to identify potential and actual negative human rights impacts.' However, it is not clear what are the circumstances that leads the company to carry out these assessments and no description of how risks are identified could be found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Identifying risks in AG suppliers • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders: 'We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk'. However, it is unclear how stakeholder consultation is used to identify risks. • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • 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)	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: Salient risk assessment (and context): 'Our efforts include conducting a risk assessment to identify potential and actual negative human rights impacts. This includes evaluation of geographical, economic and social criteria to determine points in our value chain where risk is highest, and where we can make the greatest impact'. However, no description of how the Company conducts these assessments could be found or what the company considers to be its salient human rights risks. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Public disclosure of salient risks: The Company has disclosed that it is currently undergoing a risk assessment, and the results have yet to be published. • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company states the following: 'We use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk'. However, no further description found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Including in AG supply chain: Suppliers are held to the same expectations as the Company. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Example of Actions decided: As of now, the Company is undergoing its first risk assessment, and therefore has no examples of actions decided. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: 'We track the effectiveness of our management of negative human rights impacts through the monitoring of and engagement with our suppliers, business partners and other relevant stakeholders [regarding compliance with the Human Rights Guiding Principles set forth in this Policy]. We will provide biennial public disclosure on our effectiveness'. However,

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		no further details found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness: As stated above, the Company will provide a public disclosure of effectiveness, however, results have yet to be published. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: The Company plans to publicly disclose this information, however, it has not yet been released. • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company has yet to release information regarding affected stakeholders. • Not met: Ensuring affected stakeholders can access communications: The Company states the following: 'We actively communicate the human rights guiding principles and expectations outlined in this Policy (and all updates herein) to employees, suppliers, business partners and other stakeholders via both disclosure and engagement.' However, no evidence of how stakeholders can access communications from the due diligence process found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Corporate responsibility report indicates that 'To help employees report potential misconduct, the Company provides several ways to report, including through managers, Human Resources professionals, the Legal Department and the Ethics & Compliance team. In addition, we have a confidential Ethics & Compliance Hotline for reporting an ethics or compliance concern. The Hotline has multilingual staff available 24 hours a day. Reports can be made via country-specific toll-free phone numbers or online'. The hotline website is available in more than 40 different languages. [Corporate responsibility report, 2017: kraftheinzcompany.com & Compliance hotline on website: app.convercent.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: As above. The Hotline has multilingual staff available 24 hours a day. Reports can be made via country-specific toll-free phone numbers or online'. The hotline website is available in more than 40 different languages. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Met: Opens own system to AG supplier workers: 'We provide several ways for employees, suppliers, business partners and other stakeholders to raise concerns or complaints. This includes [...] our confidential Ethics & Compliance Hotline. The Hotline is open to all stakeholders, including rightsholders, is maintained by a third-party provider and has multilingual staff available 24 hours a day.' [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company provides a confidential E&C Hotline, which is publicly available to anyone, including our business partners, for reporting an ethics or compliance concern. The Hotline is open to all stakeholders, including rightsholders, is maintained by a third-party provider and has multilingual staff available 24 hours a day.' [Kraft Heinz Ethics & Compliance Hotline: app.convercent.com & Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: as above • Met: AG supplier communities use global system: 'We provide several ways for employees, suppliers, business partners and other stakeholders to raise concerns or complaints. This includes [...] our confidential Ethics & Compliance Hotline. The

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Hotline is open to all stakeholders, including rightsholders, is maintained by a third-party provider and has multilingual staff available 24 hours a day.' [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <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
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: 'Reports from any party received through our Grievance Mechanism or any other medium are reviewed within 24 hours by the Chief Ethics & Compliance Officer during a preliminary assessment, and further addressed by executive leadership as appropriate.' However, it is unclear how long it takes for a complaint to be resolved and/or how those making the complaint will be informed throughout the process. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Not met: How complainants will be informed
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: The Company indicates in the Code of Conduct that 'No retaliation of any kind will be taken against an employee who reports suspected violations in good faith'. However, it is not clear if the commitment also applies to other stakeholders. [Employee code of conduct: kraftheinzcompany.com] • Met: Practical measures to prevent retaliation: The Company indicates in the Code that it 'will take steps to protect each employee from retaliation so that all are comfortable reporting violations and protecting the Company. Furthermore, the company states that "do not tolerate retaliation and anonymity is guaranteed." [Employee code of conduct: kraftheinzcompany.com & Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation: Suppliers are expected to follow all aspects of the Global Human Rights Policy, which includes a statement prohibiting retaliation for use of the grievance mechanism. The Company does 'not tolerate retaliation'. Although the Company expects suppliers to respect a number of 'principles contained in the policy, it is not clear whether it expects suppliers to establish a grievance mechanism open to external stakeholders and to prohibit retaliation. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com & Compliance hotline on website: app.convercent.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Won't impede state based mechanisms: The Company states the following: 'We have not and will not impede access to state-based judicial or non-judicial mechanisms for any persons raising allegations through our Grievance Mechanism'. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Complainants not asked to waive rights Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company has yet to determine how to remedy adverse impacts as it is still undergoing its risk assessment. We have not found any statement of commitment to remedy [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Says how it would remedy key sector risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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: The Company will 'will provide biennial public disclosure on[its] effectiveness' regarding the management of negative human rights impacts. However, this disclosure has yet to be released. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]

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: The Company states the following: 'we provide fair and equitable wages and other employment conditions in accordance with applicable local laws and/or the principles of this Policy, whichever is higher'. However, this does not meet the definition of living wage. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: Improving living wage practices of suppliers <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: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be published. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) <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 the following: 'We seek to respect human rights across our global operations and supply chain, which is represented by hundreds of thousands of stakeholders, including but not limited to employees, suppliers, contractors, co-packers, joint venture partners and rightsholders such as the following: foreign and migrant workers, women, children, indigenous populations, minorities and people with disabilities.' However, no mention of mapping or disclosure of suppliers could be found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The Company prohibits child labor: 'we prohibit the employment of anyone under the legal working age as defined by local law and/or the principles of this Policy, whichever is higher. We do not tolerate the use of child labor'. However, no mentions of remediation or verifying the age of the applicant could be found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (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: Debt and fees rules in codes or contracts: While the Company prohibits the use of 'forced or involuntary prison labor', no mention of debt bondage requirements for suppliers could be found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Not met: Analysis of trends in progress made: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
D.1.5.d	Prohibition on forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The Company has disclosed to CHRB that it follows the Universal Declaration of Human Rights, which allows for Freedom of Movement. However, no mention of a requirement for suppliers not to restrict employee documents found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How working with suppliers on free movement Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
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 Company recognizes and respects 'the rights to freedom of association and collective bargaining'. However, no mention of prohibition of intimidation against union members found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How working with suppliers on FoA and CB Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (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: Sets out clear Health and Safety requirements Not met: Injury Rate disclosures: The Company discloses information relating to health and safety of workers in its own operations, however, no information found relating to the supply chain. [Corporate responsibility report, 2017: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Lost days or near miss disclosures Not met: Fatalities disclosure Not met: How working with suppliers on H&S Not met: Provides analysis of trends demonstrating progress: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Rules on land & owners in codes or contracts: The Company states the following: 'we adhere to the principle of free, prior and informed consent (FPIC). We follow all applicable laws relating to the rights of land and natural resources'. However, it does not describe the requirement of having a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How working with suppliers on land issues Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Rules on water stewardship in codes or contracts: The Company states the following: 'we aim to understand and, where relevant, address water access risk, respecting everyone's right to safe, accessible and affordable water as well as to clean sanitation facilities'. However, no mention of refraining from negatively impacting access to safe water was found in codes or contract. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Not met: How working with suppliers on water stewardship issues Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com]
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Women's rights in codes or contracts: While women are mentioned in the scope of the Human Rights Policy, no requirement for equal pay for equal work, equality of opportunities, or to eliminate health and safety concerns found. [Global Human rights policy, 15/5/2019: kraftheinzcompany.com] Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress: While the Company states it will provide a biennial public disclosure on effectiveness of its management of negative human rights impacts, this information has yet to be provided. [Global Human rights policy, 15/5/2019: kraftheinzcompany.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		No allegations meeting the CHRB severity threshold were found, and so the score of 8.56 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.14 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.05 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Kraft Heinz made data public that met one or more elements of the methodology in 11 cases, leading to a disclosure score of 1.05 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Not met: Company reports on GRI: The Company 'considered the Global Reporting Initiative (GRI) G4 Sustainability Reporting Guidelines in the development of this [CSR] report and have included applicable G4 Standard Disclosures.' However, no index could be found and it is not clear if the company report against the GRI. [Corporate responsibility report, 2017: kraftheinzcompany.com] Not met: Company reports on SASB Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Kraft Heinz met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> Not met: Score 2 for A.2.2 : Board discussions Not met: Score 2 for B.1.6 : Monitoring and corrective actions Not 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"> Not 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.