



Corporate Human Rights Benchmark: General Mills supplemental disclosure

1.2 Incentives and performance management:

Zero loss culture is a core initiative with our Supply Chain organization. This spans from our own facilities to our suppliers and all aspects including human rights. Responsibility for delivering Zero loss starts with our EVP of Supply Chain and includes all his direct reports, including our Chief Purchasing Officer and the Sourcing organization. The most direct incentive tie for the Sourcing organization is through our Global Responsible Sourcing program, which drives human rights through our supply facilities. General Mills' F20 goal is to prioritize and address inherently high-risk supply locations. This goal is stated in our plans as an organization and will be measured. Achievement of these plans directly impact the performance rating and incentives for Sourcing leadership and the CSR team including manager and assistant manager.

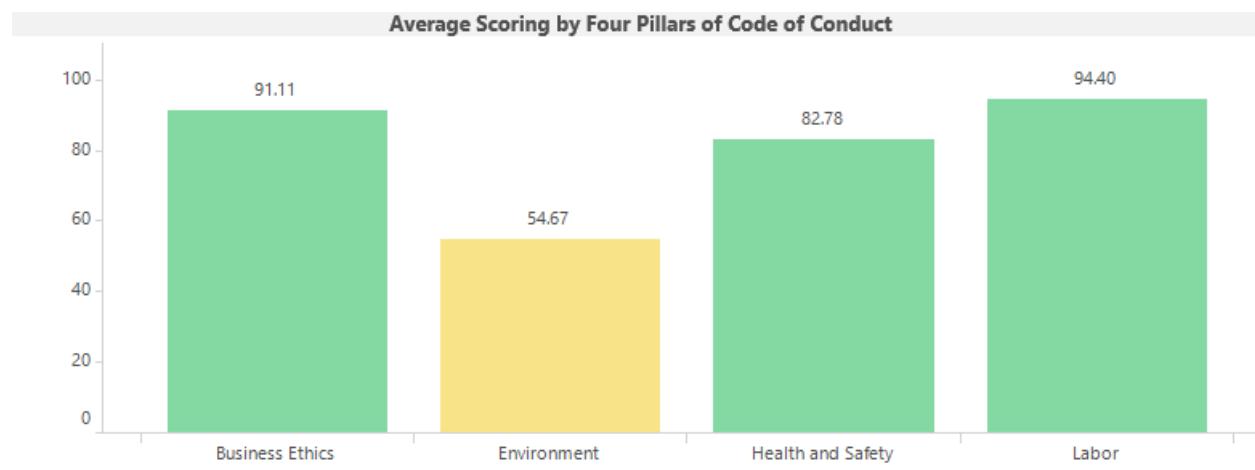
B 1.3 Integrating risk management:

Beginning in F20, Global Sourcing is expanding our risk management efforts to all areas of spend globally and beyond financial and supply risks to include all pillars of our Supplier Code of Conduct: Business Ethics, Environment, Health & Safety and Human Rights/Labor.

General Mills is actively bringing together all risks in one visualization tool to provide the Sourcing organization a full view and the ability to mitigate and correct human rights concerns.

B 2.1 and 2.2 Assessment of risks & impacts: An example

Example: Sourcing has developed a CSR dashboard which illustrates individual supplier facility risk as well as our aggregate risk by the pillars of our Supplier Code of Conduct. Here is example data that can be manipulated in several ways to demonstrate risk mitigation.



B 2.4 Tracking/monitoring/systems:

Global Sourcing has engaged with Bureau Veritas, our global program manager, to assess, address, monitor and close all pillars in our Supplier Code of Conduct including human rights via the SafeSupply portal. Annual plans are completed to ensure effectiveness of the actions we require of suppliers as well as incorporate lessons learned. For example, in F20 GMI will offer localized language of our Responsible Sourcing program to ensure suppliers understand and uphold our Supplier Code of Conduct and are able to report grievances.

C 4 Procedures publicly available/explained:

Any non-compliance observed through a 3rd party auditor has a prescribed timeline for the facility to response. Facilities have the ability to utilize our Ethics line to report grievances. The Ethics Line is a speak-up resource hosted by a 3rd party. It allows for 24/7/365 phone/web reporting and supports multilingual and anonymous reporting. Ethics Line cases are routed to Ethics & Compliance to triage for initial review, who then align an investigation team (HR, Global Security, GIA, Finance or Law) depending on the report.

D 1.2 Aligning purchasing decisions with human rights

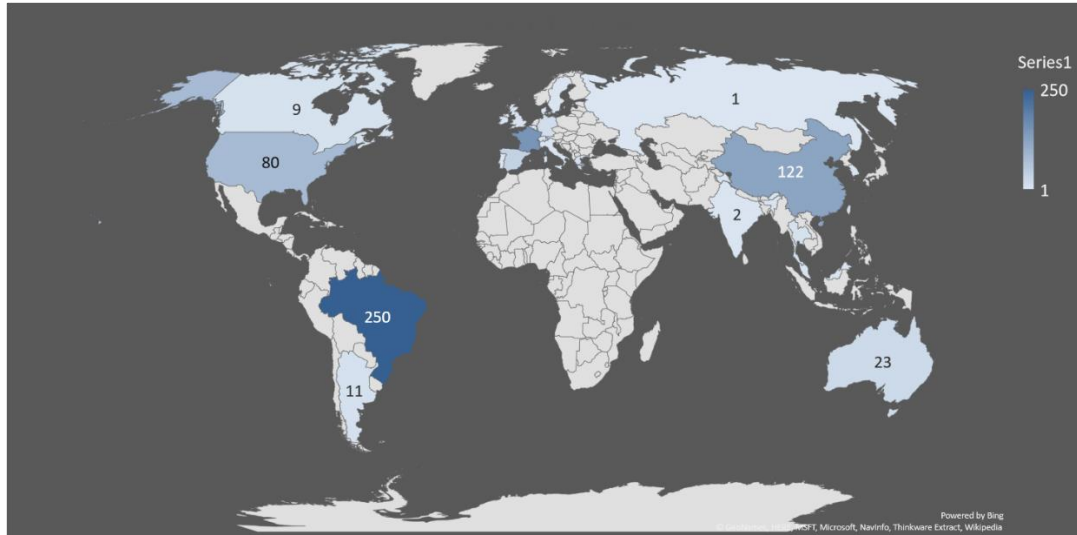
Our CSR dashboard will provide visibility to all risks associated with GMI's Supplier Code of Conduct, including Human Rights, to the global Sourcing organization in purchasing/supplier decisions. This risk and remediation plan will be included in all Holistic Category Strategies and Supplier Scorecards – beginning with Strategic suppliers.

Example: The global Sourcing organization has visibility to risks by supplier code of conduct pillars down to our lowest taxonomy. This data drives strategies and scorecards. For example, the Fats and Oils category can be broken down to the specific oil to differentiate between palm and other types of oils. This level of detail provides a true risk assessment and allow our Sourcing organization to craft the correct strategy by material.

| Supplier ID | Facility ID | L2 | L3 | Avg SAQ Score | Avg Business Ethics Score | Avg Environment Score | Avg Health & Safety Score | Avg Labor Score |
|-------------|-------------|---------------|----------------------|---------------|---------------------------|-----------------------|---------------------------|-----------------|
| 500033 | 503001 | FRUIT | ORGANIC FROZEN FRUIT | 47.13 | 33.33 | 0 | 58.33 | 44 |
| 500120 | 503417 | OTHER GRAINS | RICE | 63.22 | 100 | 0 | 58.33 | 68 |
| 500142 | 6000129 | FATS AND OILS | OTHER FATS/OILS | 91.57 | 100 | 60 | 91.67 | 100 |
| 500167 | 508575 | FRUIT | DRIED FRUIT | 32.95 | 66.67 | 6.67 | 36.11 | 33.33 |

D 1.3 Mapping the supply chain.

We can generate Tier 1 maps for all direct and indirect material categories at the supplier, supplier facility level broken down by type of material purchased down to our lowest taxonomy. For example, this map shows the breakdown of number of suppliers for one of our Sourcing platforms.



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