

A.1.6

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.

A.2.3

Human Rights risks are part of the procurement supply chain metrics, and therefore contribute to overall executive performance incentives, which roll all the way up to the CEO, who is a member of the board.

B.1.1

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.

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.

B.1.2

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.

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.

B.1.4.a

As part of the [Kellogg Global Supplier Code of Conduct](#), we require all suppliers to ensure adherence to the Code "throughout [their] supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification," *pg 1*. As stated in the Code, we require that "Suppliers must respect their Employees by ensuring them, within the context of the Supplier's business operations, a right to life, personal liberty, and personal security. Suppliers must comply with all applicable laws and regulations, including treaties and international standards such as the UN Global Compact's Ten Principles, UN Guiding Principles, Universal Declaration of Human Rights, International Bill of Human Rights, OECD Guidelines for Multinational Enterprises, and the ILO's Core Labour Standards as codified in the 8 core conventions. Special attention to ensuring these rights are upheld should be given to those who are at heightened risk for vulnerability or marginalization such as women, young people, indigenous peoples, minorities, people with disabilities, and migrant or foreign workers," *pg 4*.

To ensure that all employees have access to the [Code](#) and its requirements we also stipulate that suppliers "should review both owned operations and the operations of those supply chain partners that provide goods and services to Kellogg to verify compliance with this [Code](#). This includes ensuring that the Code is available and communicated to all Employees in their primary language," *pg 9*. We also call out the need to provide all employees access to information in their primary language

throughout our [Code](#), including in provisions regarding Land Rights, Occupational Safety, Coercion, Contracts, and in dealing with third-party labour providers.

To aid our suppliers, the [Kellogg Global Supplier Code of Conduct](#) is publicly available in 13 languages [here](#).

B.1.4.b

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," [Kellogg Global Supplier Code of Conduct](#), *pg 1*.

Our [Global Supplier Code of Conduct](#) also requires suppliers to communicate these human rights commitments throughout their operations; "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," *pg 1*. 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")," *pg 1*.

The [Global Supplier Code of Conduct](#) and its provisions are binding through Kellogg contractual agreements and, in the absence of a contract, through the acceptance of a Purchase Order as per the associated standard [Terms & Conditions](#); "Acknowledgement and agreement to the tenets of this Code are required in every Kellogg contract. In the absence of a direct contract, acceptance of a Purchase Order, and its associated standard [Terms & Conditions](#), commits the Supplier and all of its operations to adherence of this Code," *pg 1*.

It is further stated, "This Supplier Code of Conduct applies to all Suppliers and is considered a minimum basis for operational conduct. Should a specific Supplier contract contain more stringent provisions or requirements, that direct contract will supersede in the event of inconsistency with this Code," [Global Supplier Code of Conduct](#), *pg 1*.

B.1.6

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 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”, [Sustainability Milestones 2016](#), pg 35.

B.2.1

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,” [Progress Against Forced Labor 2017](#), pg 5. 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 guidances, 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.

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.

B.2.3

To prevent and mitigate risk associated with industry and operational salient human rights issues, Kellogg utilizes due diligence processes that incorporates risk assessment, monitoring and measuring KPIs for both internal and supply chain activities, and, when warranted, third-party compliance verification. These actions are in addition to the issuance and dissemination of relevant policies and requirements such as the [Kellogg Global Supplier Code of Conduct](#) and [Prohibition of Involuntary Labor Policy](#).

To remediate issues raised through internal grievance mechanisms that are not of an urgent or critical nature, Kellogg follows a standard process; "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 identify any other opportunities for improvement," [Progress Against Forced Labor Milestones 2017](#), pg 4.

Issues that require immediate intervention or action are handled through either global or regional rapid response teams. Issues include those raised regarding owned facilities or those within the broader supply chain. After a timely investigative process, corrective actions are determined and assigned to the relevant personnel or teams. Depending on the situation, these actions can include impacts or actions related to purchasing strategy, immediate supply of goods or services, supplier termination, capability building activities, awareness raising training, best practice sharing, or third-party assessment assistance. These actions are monitored and reassessed to ensure appropriate remediation of the original issue and to address any underlying root causes to mitigate recurrence, [Global Palm Milestones Jan – Jun 2017](#), pg 7.

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 Labor 2017](#) report on pg 6 in the Supply Chain Engagement: 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.

B.2.4

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.

B.2.5

As a responsible global corporate citizen, 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.

C.5

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.

C.7

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," [Progress Against Forced Labor Milestones](#), pg 4.

An example of this process in practice can be found on *pg 7* of the [Kellogg Global Palm Milestones](#) report.

D.1.10.b

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.

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](#) on *pg 3*.

To measure progress and continuous improvement, Kellogg tracks the number of women farmers reached through climate smart agricultural training, empowerment and rights awareness projects, and resource support. One example of this support is our collaborative work with women in the Ghanaian cocoa supply chain, [Responsible Sourcing Milestone 2017](#), *pg 16*.

An analysis of trends of progress made can also be found in our [Corporate Responsibility Report 2017-2018](#).

Signed



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Vice President and Chief Sustainability Officer

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