



KnowTheChain Engagement Questions 2018 Food & Beverage Benchmark

Completing these questions provides you the opportunity to guide us to information regarding your company's efforts to address human trafficking and forced labor in its supply chains. **Answers to these questions will be made publicly available on the [Business & Human Rights Resource Centre \(BHRRC\) website](#)**, a KnowTheChain partner.

KnowTheChain will review the information available on your public website, as well as information you link to from your website.

If your company was included in our 2016 benchmark and you completed our engagement questionnaire at that time, relevant responses will be included in our 2018 benchmark as long as the information is not more than three years old.

Over a period of two months (during Q2-2018), you will be invited to review the information we collected and provide additional disclosure. We will particularly welcome specific examples you may be able to provide regarding the implementation of your processes, as well any leading practices. We will invite you either publish additional disclosure on your website, and send us the link to the specific page(s), or send the information to us, and we will publish them on the [website of Business & Human Rights Resource Centre](#).

In case you do not have sufficient publicly available information on some or all of the indicators of the KnowTheChain benchmark methodology (see attached methodology and guidance), you **are welcome to disclose relevant information to us at this stage already**.¹ Please let us know by 9 February that you wish to do so, and send us the additional information by 9 March. We will publish the information provided on the [website of Business & Human Rights Resource Centre](#).

Please email your response to the below questions to Felicitas Weber, BHRRC KnowTheChain Project Lead at weber@business-humanrights.org and CC companies@knowthechain.org.

The accuracy of our reports is important to us, we appreciate your help and cooperation. Should you have any questions, please contact Felicitas Weber at weber@business-humanrights.org.

¹ Please indicate which benchmark indicators the information relates to. Should this be of interest, we would be happy to send you the indicators in an Excel or Word document for you to fill out.



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General Information

Name of company: The Kroger Co.
Name of respondent: Martha Sarra
Position of respondent: Chief Ethics and Compliance Officer
Respondent's email address: Martha.sarra@kroger.com

Disclosure Information

1. Documents

KnowTheChain aims to decrease the reporting burden for companies. Therefore, we will review information available on your company's public website. However, to ensure we take into consideration all relevant documents, we invite you to provide us with links to any statements, reports, webpages, or documents that you would us to take into account as we review your company's approach to managing forced labor risks in its supply chains.

<http://sustainability.kroger.com/index.html>

- <http://sustainability.kroger.com/supply-chain-quality-and-corporate-brands-manufacturing-standards.html>
- Our 2016 Sustainability Report is attached, which addressed the forced labor allegation noted in your report on page 45. The Kroger Co. does not maintain prior year's Sustainability Reports on its website but this 2016 report was available for approximately one year until it was replaced by the 2017 Sustainability Report.

www.thekrogerco.com

- <https://www.thekrogerco.com/vendors-suppliers/>
- <https://www.thekrogerco.com/vendors-suppliers/corporate-social-responsibility/>
- <https://www.thekrogerco.com/wp-content/uploads/2017/09/code-of-conduct.pdf>
- <https://www.thekrogerco.com/wp-content/uploads/2017/09/krgr-social-responsibility-content-for-suppliers.pdf>
- <https://www.thekrogerco.com/newsroom/statements-policies/>
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2. Membership in industry and multi-stakeholder associations

Please indicate your membership in industry and multi-stakeholder associations relevant to addressing forced labor in the supply chain.

- **PMA / United Fresh Joint Committee on Responsible Labor Practices.** This Committee has a dual mandate: 1) create an industry-wide framework to promote and reinforce worker respect and dignity, and 2) proactively support opportunities for harmonization and convergence of positive efforts throughout the global fresh produce and floral supply chains.
- **Retail Industry Leaders Association (RILA) Retail Responsible Sourcing Committee.** This Committee meets bi-monthly to benchmark member programs, learn about RILA efforts in this space, and discuss responsible sourcing topics. Forced labor issues are a frequent topic of conversation.