

**KnowTheChain Food & Beverage Benchmark Methodology
Version 2 (December 2017)**

SCORED DISCLOSURE

THEME 1 COMMITMENT AND GOVERNANCE

1.1 Commitment

The company:

(1) has publicly demonstrated its commitment to addressing human trafficking and forced labor.

1.2 Supply Chain Standards

The company's supply chain standard:

(1) requires suppliers to uphold workers' fundamental rights and freedoms (those articulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor;

(2) has been approved by a senior executive;

(3) is easily accessible from the company's website;

(4) is updated regularly, following internal review and input from external stakeholders; and

(5) is communicated to the company's suppliers.

1.3 Management and Accountability

The company:

(1) has a committee, team, program, or officer responsible for the implementation of its supply chain policies and standards that addresses human trafficking and forced labor; and

In addition to the organizational responsibility structure already noted, we also have a dedicated manager in the Sourcing organization responsible for implementation of our responsible sourcing program.

(2) has tasked a board member or board committee with oversight of its supply chain policies and standards that address human trafficking and forced labor.

The Public Responsibility Committee of our Board of Directors reviews and approves our Slavery and Human Trafficking Statement. As noted on the top of the policy, this was last approved by the Board on Feb 12, 2018.

1.4 Training

The company undertakes programs which include:

- (1) the training of all relevant decision-makers within the company on risks, policies, and standards related to human trafficking and forced labor; and
- (2) the training and capacity-building of suppliers on risks, policies, and standards related to human trafficking and forced labor, covering key supply chain contexts.

1.5 Stakeholder Engagement

In the last three years, the company has engaged relevant stakeholders by:

- (1) providing at least two examples of engagements on forced labor and human trafficking with policy makers, worker rights organisations, local NGOs, or other relevant stakeholders in countries in which its suppliers operate, covering different supply chain contexts; and
- (2) actively participating in one or more multi-stakeholder or industry initiatives focused on eradicating forced labor and human trafficking across the industry.

New in our Slavery and Human Trafficking statement this year is: General Mills participates in the Consumer Goods Forum and is fully supportive of its Forced Labor Resolution and Priority Principles: every worker should have freedom of movement; no worker should pay for a job; and no worker should be indebted or coerced to work.

THEME 2 TRACEABILITY AND RISK ASSESSMENT

2.1 Traceability

The company discloses:

- (1) the names and addresses of its first-tier suppliers;

We recently published the list of our direct suppliers for palm oil, as well as the mills that supply our direct suppliers.

<http://www.generalmills.com/en/news/issues/palm-oil-statement/current-direct-suppliers>

<https://www.generalmills.com/~media/Files/Issues/PalmOil%20MasterList%20318.pdf?la=en>

- (2) the countries of below first-tier suppliers (this does not include raw material suppliers);

List of mills supplying to our direct suppliers for palm oil is noted in (1)

- (3) the sourcing countries of raw materials at high risk of forced labor and human trafficking; and

In our 2018 Global Responsibility Report, we note the countries from which we source our top 10 priority ingredients. We call out ingredients that are at risk for forced/child labor; for example cocoa and sugarcane.

See pages 31 and 35: <http://www.generalmills.com/~media/Files/GRR/GRR-2018.pdf?la=en>

- (4) some information on its suppliers' workforce.

On p. 36 of our 2018 Global Responsibility Report, we provide information and metrics on our supplier diversity program.

<http://www.generalmills.com/~media/Files/GRR/GRR-2018.pdf?la=en>

2.2 Risk Assessment

The company discloses:

(1) details on how it conducts human rights supply chain risk or impact assessments that include forced labor risks or assessments that focus specifically on forced labor risks; and

Our 2018 Global Responsibility Report provides detail on our expanded approach to responsible sourcing.

See p. 29: <http://www.generalmills.com/~media/Files/GRR/GRR-2018.pdf?la=en>

(2) details on forced labor risks identified in different tiers of its supply chain.

THEME 3: PURCHASING PRACTICES

3.1 Purchasing Practices

Purchasing practices and pricing may both positively impact labor standards in the company's supply chain, and increase risks of forced labor and human trafficking. The company:

(1) is taking steps towards responsible raw materials sourcing;

Our 2018 Global Responsibility Report provides detail on our expanded approach to responsible sourcing.

See p. 29: <http://www.generalmills.com/~media/Files/GRR/GRR-2018.pdf?la=en>

(2) is adopting responsible purchasing practices in the first tier of its supply chain; and

One of our four pillars of our Supplier Code of Conduct is Human Rights. The SMETA protocol that we execute in supplier self-assessment questionnaire and on site audit are heavily weighed to Labor and Health & Safety pillars.

(3) provides procurement incentives to first-tier suppliers to encourage or reward good labor practices (such as price premiums, increased orders, and longer-term contracts).

3.2 Supplier Selection

The company:

(1) assesses risks of forced labor at potential suppliers prior to entering into any contracts with them.

3.3 Integration into Supplier Contracts

The company:

(1) integrates supply chain standards addressing forced labor and human trafficking into supplier contracts.

The Supplier Code of Conduct, which covers forced labor, is in all purchase orders and part of our standard Terms & Conditions

3.4 Cascading Standards through the Supply Chain

The company:

(1) requires its first-tier suppliers to take steps to ensure that their own suppliers implement standards that are in-line with the company's supply chain standards addressing forced labor and human trafficking.

The standards we hold for our suppliers are laid out in our [Supplier Code of Conduct](#). Supplier Code of Conduct obligates suppliers to comply with all applicable laws - including those related to slavery and human trafficking - in every market in which we do business with them. Suppliers certify compliance by accepting our code of conduct in the terms and conditions of each purchase order. As noted, we also expect suppliers to apply similar standards to their own suppliers and subcontractors by communicating the expectations contained in the code of conduct and holding them accountable as well

THEME 4: RECRUITMENT

4.1 Recruitment Approach

(1) has a policy that requires direct employment in its supply chain;

(2) requires employment and recruitment agencies in its supply chain to uphold workers' fundamental rights and freedoms (those articulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work), including the elimination of forced labor; and

Our Supplier Code of Conduct outlines expectations to uphold workers' fundamental rights and freedoms, including standards for human rights, forced labor and child labor. As noted in the human rights section: General Mills believes the protection of human rights throughout our supply chain is a critical part of our mission. We are guided by the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work and we are a signatory to the United Nations Global Compact.

(3) discloses information on the recruitment agencies used by its suppliers.

4.1 Recruitment Fees

The company:

(1) requires that no worker in its supply chain pay for a job—the costs of recruitment should be borne not by the worker but by the employer ("Employer Pays Principle"); and

(2) takes steps to ensure that such fees are reimbursed to the workers, in the event that it discovers that fees have been paid by workers in its supply chain.

4.3 Monitoring and Ethical Recruitment

The company:

- (1) takes steps to ensure employment and/or recruitment agencies used in its supply chain are monitored to assess and address risks of forced labor and human trafficking; and
- (2) provides details of how it supports ethical recruitment in its supply chain.

4.4 Migrant Worker Rights

The company:

- (1) takes steps to ensure migrant workers understand the terms and conditions of their recruitment and employment, and also understand their rights;
- (2) takes steps to ensure its suppliers refrain from restricting workers' movement, including through the retention of passports or other personal documents against workers' will;
- (3) takes steps to ensure migrant workers are not discriminated against, and not retaliated against, when they raise grievances; and
- (4) provides evidence of how it works with suppliers to ensure migrant workers' rights are respected.

THEME 5: WORKER VOICE

5.1 Communication of Policies

The company takes steps to ensure:

- (1) its policies and standards, which include human trafficking and forced labor, are available in the languages of its suppliers' workers; and
- (2) its human trafficking and forced labor policies and standards are communicated to workers in its supply chain.

5.2 Worker Voice

The company:

- (1) works with relevant stakeholders to engage with and educate workers in its supply chain on their labor rights;
- (2) takes steps to ensure that there are worker-to-worker education initiatives on labor rights in its supply chain;
- (3) provides evidence of the positive impact of worker engagement in its supply chain; and
- (4) provides at least two examples of worker engagement initiatives covering different supply chain contexts.

5.3 Freedom of Association

The company:

- (1) describes how it works with suppliers to improve their practices in relation to freedom of association and collective bargaining;
- (2) works with local or global trade unions to support freedom of association in its supply chain;
- (3) takes steps to ensure workplace environments in which workers are able to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association; and
- (4) provides at least two examples covering different supply chain contexts of how it improved freedom of association for supply chain workers.

5.4 Grievance Mechanism

The company:

- (1) takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labor conditions in the company's supply chain is available to its suppliers' workers and relevant stakeholders;
- (2) takes steps to ensure that the existence of the mechanism is communicated to its suppliers' workers;
- (3) takes steps to ensure that workers or an independent third-party are involved in the design or performance of the mechanism, to ensure that its suppliers' workers trust the mechanism;
- (4) discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism; and
- (5) provides evidence that the mechanism is available and used by workers below tier one in its supply chain, or by relevant stakeholders in key supply chain contexts.

THEME 6: MONITORING

6.1 Auditing Process

The company has a supplier audit process that includes:

- (1) non-scheduled visits;
- (2) a review of relevant documents;

During the Safesupply registration process, suppliers are asked to answer questions and upload documentation. This is actively reviewed by a technical expert and scored. These questions and documentation are the drivers for requesting an onsite audit.

- (3) interviews with workers;
- (4) visits to associated production facilities and related worker housing; and
- (5) supplier audits below the first tier.

6.2 Audit Disclosure

The company discloses:

- (1) the percentage of suppliers audited annually;
- (2) the percentage of unannounced audits;
- (3) the number or percentage of workers interviewed during audits;
- (4) information on the qualification of the auditors used; and
- (5) a summary of findings, including details regarding any violations revealed.

THEME 7: REMEDY

7.1 Corrective Action Plans

The company's corrective action plans include:

- (1) potential actions taken in case of non-compliance, such as stop-work notices, warning letters, supplementary training, and policy revision;
- (2) a means to verify remediation and/or implementation of corrective actions, such as record review, employee interviews, spot-checks, or other means;
- (3) potential consequences if corrective actions are not taken; and
- (4) a summary or an example of its corrective action process in practice.

7.2 Remedy Programs / Response to Allegations

A. If no allegation regarding forced labor in the company's supply chain has been identified in the last three years, the company discloses:

- (1) a process for responding to the complaints and/or reported violations of policies and standards; and
- (2) at least two examples of outcomes for workers of its remedy process in practice, covering different supply chain contexts.

B.1. If one or more allegations regarding forced labor in the company's supply chain have been identified in the last three years, the company discloses:

- (1) a process for responding to the complaints and/or reported violations of policies and standards;
- (2) a public response to the allegation, which covers each aspect of each allegation;
- (3) outcomes of the remedy process in the case of the allegation(s); and
- (4) evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

B.2. If one or more allegations regarding forced labor in the company's supply chain have been identified in the last three years, and the company denies the allegation, the company discloses:

- (1) a process for responding to the complaints and/or reported violations of policies and standards;
- (2) a public response to the allegation, which covers each aspect of each allegation;
- (3) a description of what actions it would take to prevent and remediate the alleged impacts; and
- (4) that it engages in a dialogue with the stakeholders reportedly affected in the allegation, or requires its supplier(s) to do so.

NON-SCORED DISCLOSURE

Commitment to address forced labor in the supply chain

The company has developed measurable and time-bound commitment(s) to address forced labor in the supply chain.

Compliance with Regulatory Transparency Requirements

UK Modern Slavery Act

Where applicable, the company discloses annual statements under the Modern Slavery Act which fulfils the three minimum requirements (director signature, board approval, link on homepage).

The statement made under the UK Modern Slavery Act was reviewed and approved by the Board of Directors.

California Transparency in Supply Chains Act

Where applicable, the company discloses a statement under the California Transparency in Supply Chains Act which fulfils the minimum requirements (conspicuous link on homepage, reporting against five areas).

Additional information

Please note the below information may be displayed on a company's scorecard, or may be used for KnowTheChain's analysis purposes more broadly.

Business model

To put the KnowTheChain analysis into context, companies are invited to disclose relevant information on their business model, such as sourcing countries, owned versus outsourced production, etc. [Note KnowTheChain reserves the right to edit the information provided]

Addressing forced labour risks related to third-party products

Where a company--in addition to own branded products--sells third party products, the company discloses how it assesses and addresses forced labor risks related to third party products (relevant for retail companies).