# 2020/2021 Global Reporting Initiative (GRI) Index

(Published December 2021)



### **Standard Disclosures**

Topic-Specific Standards

STANDAF	STANDARD DISCLOSURES				
General Di	sclosures   Organization Profile				
Disclosure	Description	Section (Visit the indicated section of our <u>online report</u> .)	Cross Reference	Links/Comments	
102-1	Name of the organization			Kellogg Company	
102-2	Activities, brands, products and services			Annual Report	
102-3	Location of headquarters			Battle Creek, Michigan, USA	
102-4	Location of operations			<u>Annual Report</u>	
102-5	Ownership and legal form			Annual Report	
102-6	Markets served			Annual Report	
102-7	Scale of organization			Annual Report	
102-8	Information on employees and other workers	Living Our Founder's Values		Kellogg has approximately 23,000 employees globally. The gender breakdown of employees by type of role is included within our <u>Corporate Responsibility Report</u> .	
102-9	Supply chain			Annual Report	
102-10	Significant changes to the organization and its supply chain Note: In 2020, we announced the creation of a dynamic, new category, named Natural & Insurgent, focused on further unlocking the growth potential of our on trend food forward brands. This new category is one of the largest of its type in the industry and brings together Kashi, RXBAR, Bear Naked, Pure, Leaf Jerky and Joyböl under a single umbrella with a shared mission to promote health, wellness and nutrition.			See Comments in Note under Description	



STANDAF	RD DISCLOSURES				
General D	General Disclosures   Organization Profile				
Disclosure	Description	Section (Visit the indicated section of our <u>online report.</u> )	Cross Reference	Links/Comments	
102-11	Precautionary Principle or approach			Kellogg does not have a formal policy regarding the Precautionary Approach. However, as new product and packaging ideas are considered, they are carefully evaluated by a multi-disciplinary team of senior company leaders.	
102-12	External initiatives	Included throughout report			
102-13	Membership of associations	Included throughout report			
General D	isclosures   Strategy				
102-14	CEO Statement	Executive Summary			
102-15	Key impacts, risks and opportunities			Annual Report	
General D	sclosures   Ethics and Integrity				
102-16	Values, principles, standards and norms of behavior	<u>Living Our Founder's Values</u>	SDG: 16	Our refreshed <u>Global Code of</u> <u>Ethics is available online</u> and via a mobile app.	
102-17	Mechanisms for advice and concern about ethics		SDG: 16	Ethics Hotline (confidential for employees, suppliers, partners and anyone else)	
General D	isclosures   Governance Structure				
102-18	Governance structure			Proxy, Annual Report	



### STANDARD DISCLOSURES

General Disclosures   Governance Structure (continued)				
Disclosure	Description	Section (Visit the indicated section of our online report.)	Cross Reference	Links/Comments
102-19	Delegating authority Note: Kellogg Company's Social Responsibility and Public Policy Committee of the Board of Directors oversees our corporate responsibility strategy. Our Senior Vice President (SVP) of Global Corporate Affairs, who reports to the Chairman and CEO, is responsible for successfully implementing the strategy and regularly updating the CEO and Board Committee. Our Chief Sustainability Officer (CSO) reports to the SVP of Global Corporate Affairs. Additionally, numerous leaders are accountable for achieving specific corporate responsibility commitments, based on their roles. Many of our senior leaders have annual performance goals tied to the company's corporate responsibility metrics.			See Comments in Note under Description
102-20	Executive-level responsibility for economic, environmental and social topics Note: Kellogg Company's Social Responsibility and Public Policy Committee of the Board of Directors oversees our corporate responsibility strategy. Our Senior Vice President (SVP) of Global Corporate Affairs, who reports to the Chairman and CEO, is responsible for successfully implementing the strategy and regularly updating the CEO and Board Committee. Our Chief Sustainability Officer (CSO) reports to the SVP of Global Corporate Affairs. Additionally, numerous leaders are accountable for achieving specific corporate responsibility commitments, based on their roles. Many of our senior leaders have annual performance goals tied to the company's corporate responsibility metrics.			See Comments in Note under Description
102-21	Consulting stakeholders on economic, environmental and social topics	Included throughout report	SDG: 16	Corporate Human Rights Benchmark Partnerships Know the Chain Annual Report Proxy
102-22	Composition of the highest governance body and its committees		SDG: 5, 16	Proxy
102-23	Chair of the highest governing body		SDG: 16	<u>Proxy</u>
102-24	Nominating and selecting the highest governing body		SDG: 5, 16	<u>Proxy</u>
102-25	Conflicts of interest		SDG: 16	Proxy



#### STANDARD DISCLOSURES **General Disclosures | Governance Structure** (continued) Disclosure Description Section (Visit the indicated Cross Reference Links/Comments section of our online report.) 102-26 Role of the highest governance body in setting purpose, values and **Proxy** strategy 102-27 Collective knowledge of the highest governance body SDG: 4 **Proxy** 102-28 Evaluating the highest governing body's performance Proxy 102-29 Identifying and managing economic, environmental and social Materiality assessment in SDG: 16 **Annual Report** impacts online report 10-K 102-30 Effectiveness of risk management processes **Proxy** 102-31 Review of economic, environmental and social topics The Social Responsibility and Public Policy Committee of the Board of Directors meets at least twice annually. 102-32 Highest governance body's role in sustainability reporting The Social Responsibility & **Executive Summary** Public Policy Committee of the Board of Directors oversees our corporate responsibility strategy. 102-33 Communicating critical concerns **Executive Summary** Critical concerns are communicated to the Social Responsibility & Public Policy Committee of the Board of Directors Nature and total number of critical concerns 102-34 The Social Responsibility & Public Policy Committee of the Board of Directors addresses the following key topics. Details are considered confidential. Public policy • Government relations Regulatory matters • Philanthropic activities/charitable contributions · Sustainability efforts and climate policy Related topics



STANDAR	STANDARD DISCLOSURES					
General D	General Disclosures   Governance Structure (continued)					
Disclosure	Description	Section (Visit the indicated section of our online report.)	Cross Reference	Links/Comments		
102-35	Remuneration policies			<u>Proxy</u>		
102-36	Process for determining remuneration			Proxy		
102-37	Stakeholders' involvement in remuneration		SDG: 16	Proxy		
102-38	Annual total compensation ratio (Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median total annual compensation for all employees [excluding the highest-paid individual in the same country)			Proxy		
General D	isclosures   Stakeholder Engagement					
102-40	List of stakeholder groups	Included throughout report		<u>Partnerships</u>		
102-41	Collective bargaining agreements		SDG: 8	46%		
102-42	Identifying stakeholders for engagement	Included throughout report		<u>Partnerships</u>		
102-43	Approach to stakeholder engagement	Included throughout report		<u>Partnerships</u>		
102-44	Key topics and concerns raised	Included throughout report		<u>Partnerships</u>		
General D	isclosures   Reporting Practice					
102-45	Entities included in the consolidated financial statement			Annual Report, Exhibit 20.01		
102-46	Defining report content and topic boundaries	Materiality assessment in online report				
102-47	List of material topics	Materiality assessment in online report				
102-48	Restatements of information			None		
102-49	Changes in reporting			None		



STANDAR	STANDARD DISCLOSURES					
General D	General Disclosures   Reporting Practice (continued)					
Disclosure	Disclosure	Disclosure	Disclosure	Disclosure		
102-50	Reporting period			The information primarily covers 2020 activities. It also includes a few examples of corporate responsibility efforts from late 2019 to early 2021.		
102-51	Date of most recent report			2020		
102-52	Reporting cycle			Kellogg Company intends to continue publishing an annual Corporate Responsibility Report.		
102-53	Contact point for questions regarding the report			https://www.kelloggs.com/en_U S/contact-us.html		
102-54	Claims of reporting in accordance with the GRI Standards			Core		
102-55	GRI content index			<u>GRI Index</u>		
102-56	<ul> <li>External assurance</li> <li>Note:</li> <li>Manufacturing energy use and GHG emissions, along with Scope 3 GHG emissions, have received independent verification against the World Resources Institute/World Business Council for Sustainable Development Greenhouse Gas Protocol.</li> <li>Water use data from our top ten highest-risk manufacturing locations has received independent verification against the CDP Guidance for Companies for Corporate Reporting on Water.</li> </ul>	Nurturing Our Planet		See Comments in Note under Description		
General D	isclosures   Management Approach					
103-1	Explanation of the material topic and its boundary	Materiality assessment in online report	SDG: 13, 14, 15			
103-2	The management approach and its components	<u>Policies, Positions and</u> <u>Milestones in online report</u>				
103-3	Evaluation of the management approach	Materiality assessment in online report				



#### **TOPIC-SPECIFIC STANDARDS Economic | Economic Performance** Disclosure Description Section (Visit the indicated Cross Reference Links/Comments section of our online report.) 201-1 Direct economic value generated and distributed SDG: 2, 8, 9 Annual Report 201-2 Financial implications and other risks and opportunities due to SDG: 13 Annual Report climate change 201-3 Defined benefit plan obligations and other retirement plans Annual Report 201-4 Financial assistance received from government Kellogg occasionally receives standard, non-material support from government entities in the form of tax abatements. renaissance zone credits and payments, as well as support for employee training. Economic | Market Presence 202-1 Ratios of standard entry-level wage by gender compared to local SDG: 1, 5, 7, 8 **Annual Report** minimum wage 202-2 Proportion of senior management hired from the local community SDG: 8 Annual Report Economic | Indirect Economic Impacts 203-1 Infrastructure investments and services supported Included throughout report SDG: 2, 5, 7, 9, 11 Annual Report 203-2 Significant indirect economic impacts Included throughout report SDG: 1, 2, 3, 8, 10, 17 **Annual Report** 204-1 Proportion of spending on local suppliers SDG: 12 Kellogg sources the majority of our grains from the country in which foods are made. Some ingredients, such as cocoa and vanilla, cannot be grown and purchased near significant operations. Responsible Sourcing Milestones



#### **TOPIC-SPECIFIC STANDARDS Economic | Anti-Corruption** Disclosure Description Section (Visit the indicated Cross Reference Links/Comments section of our online report.) 205-1 Operations assessed for risks related to corruption SDG: 16 Select leaders and managers in UNGC: 10 100 percent of our global operations participate in our annual Enterprise Risk Assessments that address fraud. anti-corruption compliance and management of third-party intermediaries. 205-2 Communication and training about anti-corruption policies and SDG: 16 Included in annual employee procedures training 205-3 Confirmed incidents of corruption and actions taken Kellogg has a robust process in SDG: 16 place to assess the risk of corruption and takes action when necessary. Based on concerns raised by an employee and a subsequent investigation resulted in the removal of a supplier. **Economic | Anti-competitive Behavior** 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly SDG: 16 Global Code of Ethics practices Palm Oil Grievance Tracker **Human Rights Milestones** Economic | Tax 207-1 Tax Policy and objectives Approach to tax 207-2 Tax governance, control and risk management 10-K **Environmental | Materials** 301-1 Materials used by weight or volume SDG: 8, 12 Responsible Sourcing Milestones UNGC: 7, 8 Packaging Milestones



#### **TOPIC-SPECIFIC STANDARDS** Environmental | Materials (continued) Disclosure Description Section (Visit the indicated Cross Reference Links/Comments section of our online report.) 301-2 Recycled input materials used Nurturing Our Planet SDG: 8.12 • 95% of timber-based UNGC: 7, 8, 9 packaging is from recycled or certified-virgin sustainable sources (FSC, PEFC, SFI) • 75% of global timber-based packaging comes from recycled content Packaging Milestones Environmental | Energy 302-1 Energy consumption within the organization Nurturing Our Planet SDG: 7, 8, 12, 13 2020 data reported to CDP UNDG: 7, 8, 9 SDG: 7, 8, 12, 13 2020 data reported to CDP 302-3 **Energy intensity** Nurturing Our Planet UNDG: 7, 8, 9 Climate Milestones 302-4 Reduction of energy consumption Nurturing Our Planet SDG: 7, 8, 12, 13 2020 data reported to CDP UNDG: 7. 8. 9 Energy conservation Environmental | Water 303-1 Interactions with water as a shared resource: Nurturing Our Planet SDG: 6 2020 data reported to CDP UNGC: 7, 8, 9 Water Risk Assessment 303-3 Water withdrawal Nurturing Our Planet SDG: 6 2020 data reported to CDP Water Risk Assessment UNGC: 7, 8, 9 303-4 See Comments in Note under Water discharge Nurturing Our Planet SDG: 6 Note: Total effluent from manufacturing 2020: 8,315 megaliters. UNGC: 6, 9 Description Breakdown by destination is not available. 303-5 Water consumption **Nurturing Our Planet** SDG: 6 See Comments in Note under Note: Total water use in 2020 from manufacturing: 10,568 megaliters UNGC: 6, 9 Description (groundwater: 1,757 megaliters; municipal supplier: 8,810 megaliters). Total water use in 2020 from high water risk manufacturing locations: 6,250 megaliters (groundwater: 918 megaliters; municipal supplier: 5,332 megaliters).



Environm	Environmental   Biodiversity				
Disclosure	Description	Section (Visit the indicated section of our <u>online report.</u> )	Cross Reference	Links/Comments	
304-1	Operational sites owned, leased, managed in or adjacent to protected areas and areas of high biodiversity outside protected areas		SDG: 6, 14, 15 UNGC: 7, 8, 9	None	
304-2	Significant impacts of activities, products, and services on biodiversity	Nurturing Our Planet	SDG: 6, 14, 15 UNGC: 7, 8, 9	Global Policy on Deforestation Supporting Biodiversity 2020 Palm Oil Milestones Responsible Sourcing Milestones	
304-3	Habitats protected or restored	Nurturing Our Planet	SDG: 6, 12, 14, 15 UNGC: 7, 8, 9	Global Policy on Deforestation Supporting Biodiversity 2020 Palm Oil Milestones Responsible Sourcing Milestones	
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations		SDG: 6, 14, 15 UNGC: 7, 8	None	
Environm	ental   Emissions				
305-1	Direct (Scope 1) GHG emissions Kellogg Note: As noted in Section 8 of the CDP Climate Change Information Request, we report combined Scope 1 (including emissions from the combustion of biomass and biogas) and Scope 2 emissions from global manufacturing operations and global company-wide operations in this Corporate Responsibility Report. Specifically, these combined Scope 1 and 2 emissions include the data reported in CDP CC8.2, 8.3a, and 8.9.	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	See Comments in Note under Description	
305-2	Energy indirect (Scope 2) GHG emissions	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	2020 data reported to CDP	
305-3	Other indirect (Scope 3) GHG emissions	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	2020 data reported to CDP	
305-4	GHG emissions intensity	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	2020 data reported to CDP	
305-5	Reduction of GHG emissions	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	2020 data reported to CDP	



Environmental   Effluents and Waste					
Disclosure	Description	Section (Visit the indicated section of our online report.)	Cross Reference	Links/Comments	
306-1	Waste generation and significant waste-related impacts	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	Food Loss and Waste Position Statement/Methodology Food and organic waste reduction	
306-2	Management of significant waste-related impacts	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	Food Loss and Waste Position Statement/Methodology Food and organic waste reduction	
306-3	Waste generated	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	In tonnes: Total Waste to Landfill: 18,637 Total Anaerobic Digestion: 2,812 Total Bio-Recycling: 4,412 Total Composting: 4,484 Total External WWTP: 643 Total Animal Feed Waste: 207,091 Total Fermentation: 158 Total Incinerated: 3,847 Total Land Application: 4,543 Total Recycled: 33,232 TOTAL WASTE: 279,860,528	
306-4	Waste diverted from landfill	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	In tonnes: Total Anaerobic Digestion: 2,812 Total Bio-Recycling: 4,412 Total Composting: 4,484 Total External WWTP: 643 Total Animal Feed Waste: 207,091 Total Fermentation: 158 Total Land Application: 4,543 Total Recycled: 33,232	
306-5	Waste directed to disposal	Nurturing Our Planet	SDG: 6, 12, 13, 14, 15 UNGC: 7, 8, 9	In tonnes: Total Waste to Landfill: 18,637 Total Incinerated: 3,847	
Environmental   Compliance					
307-1	Non-compliance with environmental laws and regulations		SDG: 12, 13, 14, 15, 16 UNGC: 7, 8, 9	Kellogg has not paid any significant fines (> USD \$10,000) related to environmental or ecological issues in the past four fiscal years.	



TOPIC-SP	TOPIC-SPECIFIC STANDARDS				
Environme	ental   Supplier Environmental Assessment				
Disclosure	Description	Section (Visit the indicated section of our <u>online report</u> .)	Cross Reference	Links/Comments	
308-1	New suppliers that were screened using environmental criteria		SDG: 13	100%	
308-2	Negative environmental impacts in the supply chain and actions taken		SDG: 13 UNGC: 7, 8, 9	Global Palm Milestones Responsible Sourcing Milestones	
Social   Er	nployment				
401-1	New employee hires and employee turnover		SDG: 5, 8 UNGC: 6	Total employee turnover in 2019 for North America, Latin America and Asia Pacific was 27%. Data was unavailable for Europe and does not include China, Brazil and Egypt.	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees		UNGC: 6	Data varies by region and even within regions	
401-3	Parental leave		SDG: 5, 8	Data varies by region and even within regions	
Social   La	bor/Management Relations				
402-1	Minimum notice periods regarding operational changes		SDG: 8 UNGC: 3, 6	Notice periods – if any – may vary by contract and/or legislation and/or local regulation. We always comply with local regulations and have had no actions brought against the company for violation of notice periods.	
Social   O	ccupational Health and Safety				
403-1	Occupational Health and safety management system Note: Kellogg is on a Zero (net injuries) is Possible journey. Employee Health and Safety is demonstrated by leadership and reinforced across our empowered and engaged culture. We have a comprehensive occupational health and safety management system that was implemented to ensure compliance against approximately 60 global standards that we deem essential in the workplace. The standards are applicable to all workers, workplaces and activities. We also have a global employee health and safety statement signed by our CEO.	Living Our Founder's Values	SDG: 3, 8	See Comments in Note under Description	



Social   Occupational Health and Safety continued				
Disclosure	Description	Section (Visit the indicated section of our online report.)	Cross Reference	Links/Comments
403-2	Hazard identification, risk assessment and incident investigation Note: Through risk-based methodologies, we build capabilities in our people and improvement in our processes. We have a comprehensive hazard identification, assessment and incident investigation process and system. Our hazard identification process is referred to as Safety 7 and our risk assessment processes are embedded into our management systems, processes and tools. All of these processes are designed to access risk on routine and non-routine tasks. All of the hazard identification, risk assessment and incident investigations are part of our Kellogg Work System Phase 0 and are minimum requirements for our facilities globally. We have specific management system standards around each of these elements.	Living Our Founder's Values	SDG: 3, 8 UNGC: 6	See Comments in Note under Description
403-3	Occupational health services  Note: We have comprehensive occupational health elements as part of our overall Employee Health and Safety Management System. Our EHS Management is has a fully defined process, system and specific tools to support the execution of this work globally. Our health services are part of our comprehensive management system and are auditing every two years.	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	See Comments in Note under Description
403-4	Worker participation, consultation and communication on occupational health and safety Note: The mission of Employee Health and Safety at Kellogg is to deliver value through a culture that embraces the belief that zero injuries are possible, while minimizing our impact on the planet and communities where we live, work and source. Creating a strong safety culture and capabilities within every individual at Kellogg is one of our K Values. All Plant Leadership Team members actively coach teams in EHS principles. Everyone is engaged and accountable to eliminate losses. Employees establish and execute standard work to restore and maintain conditions; and we do not tolerate unsafe behavior, conditions and actions that harm people or the environment. Employees are continuously improving their skills to sustain the health of our systems and the safety absolutes that drive accountability to our standards. Safety is ignited through 100% workforce engagement.	Living Our Founder's Values		



Social   O	ccupational Health and Safety continued			
Disclosure	Description	Section (Visit the indicated section of our online report.)	Cross Reference	Links/Comments
403-5	Worker training on occupational health and safety Note: Our Kellogg Work System (KWS) is built on the belief of 100% engagement through the building of capabilities in team members. We leverage a skills matrix to capture the required skills and level of competency required for roles as part of the KWS journey. We also meet or exceed all regulatory training requirements. At Kellogg, safety is not proprietary. We learn, listen and remain curious to further strengthen our EHS Center of Excellence.	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	See Comments in Note under Description
403-6	Promotion of worker health	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	We follow all reporting requirements for worker health globally.
403-7	Prevention and mitigation of occupational health and safety impact directly linked by business relationships	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	We conduct thorough industrial hygiene testing to proactively mitigate any potential health risks.
403-8	Workers covered by an occupational health and safety management system	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	All workers are covered by our Global Employee Health & Safety Management System.
403-9	Work-related injuries	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	Total Recordable Incident Rate: 0.37. Industry average is 4.0
403-10	Work-related ill health	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	Lost Time Incident Rate: 0.20 Industry average is 1.2. No fatalities in 2020
Social   Ti	raining and Education			
404-1	Average hours of training per year per employee	Living Our Founder's Values	SDG: 5, 8	19.5 hours
404-2	Programs for upgrading employee skills and transition assistance programs			<ul> <li>Launched a global training and qualification process for all production employees globally</li> <li>80% of eligible employees globally are leveraging LinkedIn Learning for their continuous learning and development</li> </ul>



TOPIC-SP	PECIFIC STANDARDS			
Social   Tı	raining and Education continued			
Disclosure	Description	Section (Visit the indicated section of our online report.)	Cross Reference	Links/Comments
404-3	Percentage of employees receiving regular performance and career development reviews			100%
Social   D	iversity and Equal Opportunity			
405-1	Diversity of governance bodies and employees	Living Our Founder's Values	SDG: 5, 8 UNGC: 6	Features Diversity & Inclusion Annual Report Proxy
405-2	Ratio of basic salary and remuneration of women to men		SDG: 5, 8, 10 UNGC: 6	Ratio (=average female salary/average male salary)  Executive level base salary = 0.81249  Management level (base salary) = 1.07744  Management level (base salary + other cash incentives) = 1.08267  Non-management level = 1.00667
Social   N	on-discrimination			
406-1	Incidents of discrimination and corrective actions taken		SDG: 5, 8, 16 UNGC: 1, 6	We take internal concerns seriously. Our internal standards are higher than legal expectations and we take appropriate corrective action when we believe our policies have been violated.
Social   F	reedom of Association and Collective Bargaining			
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		SDG: 8 UNGC: 1, 2, 3	Global Supplier Code of Conduct
Social   C	hild Labor			
408-1	Operations and suppliers at significant risk for incidents of child labor	<u>Living Our Founder's Values</u>	SDG: 3,4	Global Supplier Code of Conduct



TOPIC-SF	PECIFIC STANDARDS					
Social   F	Social   Forced or Compulsory Labor					
Disclosure	Description	Section (Visit the indicated section of our online report.)	Cross Reference	Links/Comments		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Living Our Founder's Values	SDG: 8 UNGC: 1, 2, 4	Global Supplier Code of Conduct		
Social   S	Social   Security Practices					
410-1	Security personnel trained in human rights policies or procedures		SDG: 16	100%		
Social   Ir	ndigenous Rights					
411-1	Incidents of violations involving rights of indigenous peoples		SDG: 2 UNGC: 1, 2	Palm Oil Grievance Tracker Global Palm Oil Milestones		
Social   H	luman Rights Assessment					
412-1	<ul> <li>Operations that have been subject to human rights reviews or impact assessments</li> <li>In 2020 we partnered with external consulting group ELELVATE to review our internal manufacturing operations and TI supplier sites to determine an updated set of salient human rights risks. From this review we focused on seven human rights risks that were most material to our business and where we could make the greatest impact. These can be found in our Human Rights Policy. Through customer and internal initiation we also completed 5 internal SMETA 4-Pillar audits of high-risk facilities. No critical NCs were found and all minor NCs have been resolved.</li> <li>Within our supply chain we also piloted, with ELEVATE, a human rights assessment program focused on worker voice, child labor, and audit. These assessments covered 26 high risk supplier sites. We are currently working back with ELEVATE to finalize our remediation and mitigation plans for these sites.</li> </ul>	Living Our Founder's Values	SDG: 1, 3, 5, 11, 12 UNGC: 1, 2	Human Rights Policy		
412-2	Employee training on human rights policies or procedures	Living Our Founder's Values	SDG: 1, 3, 5, 11, 12 UNGC: 1, 2	Included in global Employee Code of Ethics training and the Supplier Code		
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening		SDG: 1, 3, 5, 11, 12 UNGC: 1, 2	We conduct human rights screenings in all emerging markets where we have made significant investments.		



#### **TOPIC-SPECIFIC STANDARDS** Social | Local Communities Disclosure Description Section (Visit the indicated Cross Reference Links/Comments section of our online report.) 413-1 Operations with local community engagement, impact assessments Feeding People In Need; SDG: 1. 2 Kellogg supports the and development programs Nurturing Our Planet; Living UNGC: 1. 2 communities where it has Our Founder's Values operations, the farming communities where our ingredients are grown, and farmers beyond our direct supply chain. 413-2 Operations with significant actual and potential negative impacts on SDG: 1, 2 Global Code of Ethics local communities Palm Oil Grievance Tracker UNGC: 1, 2 Human Rights Milestones **Supplier Assessment for Labor Practices** Social | 414-1 80%. screenings cover the top New suppliers that were screened using labor practices criteria Living Our Founder's Values SDG: 1, 5, 8, 16 80% spend and the high-risk UNGC: 1, 2 categories Global Supplier Code of Conduct SDG: 1, 5, 8, 16 414-2 Negative social impacts in the supply chain and actions taken Global Code of Ethics Palm Oil Grievance Tracker UNGC: 1, 2 **Human Rights Milestones** Social | Public Policy 415-1 Political contributions SDG: 16 Corporate Political Expenditures UNGC: 10 Political Contributions Policy Customer (Consumer) Health and Safety Social | Assessment of the health and safety impacts of product and service Nourishing With Our Foods SDG: 3 **Nutrition Milestones** 416-1 Access to Nutrition Index categories 416-2 Incidents of non-compliance concerning the health and safety SDG: 3 22,656 boxes of Kellogg's™ Coco impacts of products and services Balls (可可球) were recalled in China.



TOPIC-SPECIFIC STANDARDS				
Social   Marketing and Labeling				
Disclosure	Description	Section (Visit the indicated section of our <u>online report</u> .)	Cross Reference	Links/Comments
417-1	Requirements for product and service information and labeling	Nourishing With Our Foods	SDG: 12, 16	Nutrition Milestones Childhood Wellbeing Promise
417-2	Incidents of non-compliance concerning product and service information and labeling		SDG: 3, 12	None
417-3	Incidents of non-compliance concerning marketing communications Note: In 2020, Kellogg Company identified one violation of our CFBAI Pledge. In Q4 2020, a third-party media vendor errantly ran child-directed Kellogg branded advertisements during programming developed for children under 6, in violation of our pledge to not market any products to children under 6. The cause of the issue was determined to be the media vendor's failure to accurately apply Kellogg content targeting parameters. We worked with the vendor to implement procedures to help ensure that this error is not repeated.		SDG: 3, 12	See comments in Note under description
Social   Customer (Consumer) Privacy				
418-1	Substantiated complaints concerning breaches of customer (consumer) privacy and losses of customer (consumer) data		SDG: 16	None
Social   Socioeconomic Compliance				
419-1	Non-compliance with laws and regulations in social and economic area			None

