

# 2019/2020 Global Reporting Initiative Index

(Published June 2020)



[Standard Disclosures](#)

[Topic-Specific Standards](#)

[Food Processing Sector Standards](#)

STANDARD DISCLOSURES				
General Disclosures   Organization Profile				
Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
102-1	Name of the organization	Executive Summary		Kellogg Company
102-2	Activities, brands, products and services			<a href="#">Annual Report</a>
102-3	Location of headquarters			Battle Creek, Michigan, USA
102-4	Location of operations	Executive Summary		<a href="#">Annual Report</a>
102-5	Ownership and legal form			<a href="#">Annual Report</a>
102-6	Markets served			<a href="#">Annual Report</a>
102-7	Scale of organization			<a href="#">Annual Report</a>
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 <a href="#">Corporate Responsibility Report</a> .
102-9	Supply chain			<a href="#">Annual Report</a>



## STANDARD DISCLOSURES

### General Disclosures | Organization Profile cont.

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
102-10	<p>Significant changes to the organization and its supply chain</p> <p><i>Note: On March 31, 2019, Kellogg and Ferrero International S.A. (Ferrero) entered into a stock and asset purchase agreement, pursuant to which, subject to the satisfaction or waiver of certain conditions, Ferrero agreed to acquire from Kellogg selected cookies, fruit and fruit-flavored snacks, pie crusts, and ice cream cones businesses (such transaction, the “Transaction”). The parties completed the transaction on July 28, 2019. In connection with the sale, Kellogg also entered into a transition services agreement (TSA) with Ferrero, under which Kellogg will provide certain services to Ferrero to help facilitate an orderly transition of the businesses following the sale. In return for these services, Ferrero is required to pay certain agreed upon fees that are designed to reimburse Kellogg for certain costs incurred by Kellogg in providing such services, plus specified immaterial margins. The TSA provides for a term of services starting at the sale completion date and continuing for a period of up to 18 months.</i></p>			See Comments in Note under Description.
102-11	Precautionary Principle or approach			<p>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.</p>
102-12	External initiatives		Included throughout report	
102-13	Membership of associations		Included throughout report	

## STANDARD DISCLOSURES

### General Disclosures | Strategy

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
102-14	CEO Statement	Executive Summary		
102-15	Key impacts, risks and opportunities			<a href="#">Annual Report</a>

### General Disclosures | Ethics and Integrity

102-16	Values, principles, standards and norms of behavior	Living Our Founder's Values	SDG: 16	
102-17	Mechanisms for advice and concern about ethics		SDG: 16	Ethics Hotline (confidential for employees, suppliers, partners and anyone else)

### General Disclosures | Governance Structure

102-18	Governance structure			<a href="#">Annual Report</a>
102-19	Delegating authority	Executive Summary		
102-20	Executive-level responsibility for economic, environmental and social topics	Executive Summary		
102-21	Consulting stakeholders on economic, environmental and social topics <i>Note: Kellogg will publish a summary of its 2020 ingredient materiality assessment as part of our annual responsible sourcing milestones. Kellogg consulted 17 external organizations, across disciplines, to incorporate stakeholder feedback on material economic, environmental, and social risks into our 2020 ingredient materiality assessment results.</i>	Included throughout report	SDG: 16	<a href="#">Corporate Human Rights Benchmark</a> <a href="#">Know the Chain Proxy</a>
102-22	Composition of the highest governance body and its committees		SDG: 5, 16	<a href="#">Proxy</a>
102-23	Chair of the highest governing body		SDG: 16	<a href="#">Proxy</a>
102-24	Nominating and selecting the highest governing body		SDG: 5, 16	<a href="#">Proxy</a>

## STANDARD DISCLOSURES

### General Disclosures | Governance Structure (continued)

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
102-25	Conflicts of interest		SDG: 16	<a href="#">Proxy</a>
102-26	Role of the highest governance body in setting purpose, values and strategy			<a href="#">Proxy</a>
102-27	Collective knowledge of the highest governance body		SDG: 4	<a href="#">Proxy</a>
102-28	Evaluating the highest governing body's performance			<a href="#">Proxy</a>
102-29	Identifying and managing economic, environmental and social impacts	<b>Executive Summary</b>	SDG: 16	
102-30	Effectiveness of risk management processes <i>Note: Kellogg Company's enterprise risk assessment process includes identifying key risks, assessing the potential likelihood of the risk materializing, assessing the potential impact of the identified risks, identifying the responsible parties (specific management owner, Board or Board Committee oversight owner), and risk mitigation steps that have been taken. This process serves to align management and the Audit Committee on risk tolerance related to each risk. The process also serves to identify, if applicable, the interaction between various risks.</i>			See Comments in Note under Description.
102-31	Review of economic, environmental and social topics			The Social Responsibility and Public Policy Committee of the Board of Directors meets approximately two times annually.
102-32	Highest governance body's role in sustainability reporting	<b>Executive Summary</b>		The Social Responsibility & Public Policy Committee of our Board of Directors
102-33	Communicating critical concerns	<b>Executive Summary</b>		

## STANDARD DISCLOSURES

### General Disclosures | Governance Structure (continued)

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
102-34	Nature and total number of critical concerns			None
102-35	Remuneration policies			<a href="#">Proxy</a>
102-36	Process for determining remuneration			<a href="#">Proxy</a>
102-37	Stakeholders' involvement in remuneration		SDG: 16	<a href="#">Proxy</a>
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)			<a href="#">Proxy</a>
102-39	Percentage increase in annual total compensation ratio (ratio of the % increase in annual total compensation for the organization's highest-paid individual in each country of significant operations to the media % increase in annual total compensation for all employees [excluding the highest-paid individual] in the same country)			<a href="#">Proxy</a>

### General Disclosures | Stakeholder Engagement

102-40	List of stakeholder groups	Included throughout report		
102-41	Collective bargaining agreements		SDG: 8	49 percent
102-42	Identifying stakeholders for engagement	Included throughout report		
102-43	Approach to stakeholder engagement	Included throughout report		
102-44	Key topics and concerns raised	Included throughout report		

## STANDARD DISCLOSURES

### General Disclosures | Reporting Practice

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
102-45	Entities included in the consolidated financial statement			<a href="#">Annual Report</a>
102-46	Defining report content and topic boundaries	Executive Summary: Materiality Across our Value Chain		
102-47	List of material topics	Executive Summary: Materiality Across our Value Chain		
102-48	Restatements of information			None
102-49	Changes in reporting			None
102-50	Reporting period	Executive Summary		
102-51	Date of most recent report	Executive Summary		
102-52	Reporting cycle	Executive Summary		
102-53	Contact point for questions regarding the report	Executive Summary		
102-54	Claims of reporting in accordance with the GRI Standards	Executive Summary		Core
102-55	GRI content index	Executive Summary		<a href="#">GRI Index</a>
102-56	External assurance <i>Note: 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. 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 on Behalf of Investors and Supply Chain Members.</i>	Nurturing Our Planet		See Comments in Note under Description.

## STANDARD DISCLOSURES

### General Disclosures | Management Approach

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
103-1	Explanation of the material topic and its boundary	<b>Executive Summary:</b> <b>Materiality Across our Value Chain</b>	SDG: 13, 14, 15	

## TOPIC-SPECIFIC STANDARDS

### Economic | Economic Performance

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
201-1	Direct economic value generated and distributed		SDG: 2, 8, 9	<a href="#">Annual Report</a>
201-2	Financial implications and other risks and opportunities due to climate change		SDG: 13	<a href="#">Annual Report</a>
201-3	Defined benefit plan obligations and other retirement plans			<a href="#">Annual Report</a>
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 minimum wage		SDG: 1, 5, 7, 8	<a href="#">Annual Report</a>
202-2	Proportion of senior management hired from the local community		SDG: 8	<a href="#">Annual Report</a>

### Economic | Indirect Economic Impacts

203-1	Infrastructure investments and services supported	Included throughout report	SDG: 2, 5, 7, 9, 11	
203-2	Significant indirect economic impacts	Included throughout report	SDG: 1, 2, 3, 8, 10, 17	



## TOPIC-SPECIFIC STANDARDS

### Economic | Procurement/Sourcing Practices

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
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. <a href="#">Responsible Sourcing Milestones</a>

### Economic | Anti-Corruption

205-1	Operations assessed for risks related to corruption		SDG: 16 UNGC: 10	Select leaders and managers in 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 procedures		SDG: 16	Included in annual employee training
205-3	Confirmed incidents of corruption and actions taken		SDG: 16	Kellogg has a robust process in 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.

## TOPIC-SPECIFIC STANDARDS

### Economic | Anti-competitive Behavior

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		SDG: 16	Kellogg has a robust process in place to assess the risk of anti-competitive behavior, anti-trust and monopoly practices and takes action when necessary. No actions were required in the last year.

### Economic | Tax

207-2	Tax governance, control and risk management			<a href="#">10-K</a>
-------	---	--	--	----------------------

### Environmental | Materials

301-1	Materials used by weight or volume		SDG: 8, 12 UNGC: 7, 8	Kellogg does not publicly provide this proprietary information.
301-2	Recycled input materials used	Nurturing Our Planet	SDG: 8, 12 UNGC: 7, 8, 9	94 percent of timber-based packaging is from recycled or certified virgin sustainable sources (FSC, PEFC, SFI). 74 percent of global timber-based packaging comes from recycled content. This number does not include information from Egypt.
301-3	Reclaimed products and their packaging materials		SDG: 8, 12	Not applicable

## TOPIC-SPECIFIC STANDARDS

### Environmental | Energy

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
302-1	Energy consumption within the organization	Nurturing Our Planet	SDG: 7, 8, 12, 13 UNDG: 7, 8, 9	<a href="#">2018 data reported to CDP</a> ; 2019 data not yet available
302-3	Energy intensity	Nurturing Our Planet	SDG: 7, 8, 12, 13 UNDG: 7, 8, 9	
302-4	Reduction of energy consumption	Nurturing Our Planet	SDG: 7, 8, 12, 13 UNDG: 7, 8, 9	
302-5	Reductions in energy requirements of products and services		SDG: 7, 8, 12, 13 UNDG: 7, 8	Not applicable

### Environmental | Water

303-1	Interactions with water as a shared resource:	Nurturing Our Planet	SDG: 6 UNGC: 7, 8, 9	<a href="#">2018 data reported to CDP</a> ; 2019 data not yet available <a href="#">Water Risk Assessment</a>
303-2	Management of water discharge-related impacts	Nurturing Our Planet	SDG: 6 UNGC: 7, 8, 9	
303-3	Water withdrawal	Nurturing Our Planet	SDG: 6 UNGC: 7, 8, 9	<a href="#">2018 data reported to CDP</a> ; 2019 data not yet available <a href="#">Water Risk Assessment</a>
303-4	Water Discharge <i>Note: Total effluent from manufacturing 2019: 9,765 megaliters. Breakdown by destination is not available.</i>	Nurturing Our Planet	SDG: 6 UNGC: 6, 9	See Comments in Note under Description.

## TOPIC-SPECIFIC STANDARDS

### Environmental | Water (continued)

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
303-5	Water consumption <i>Note: Total water use 2019 from manufacturing: 11,241 megaliters (groundwater- 1,738 megaliters; municipal supplier - 9,503 megaliters; trucked water - 0.02 megaliters). Total water use in 2019 from high water risk manufacturing locations: 6,298 megaliters (groundwater - 928 megaliters; municipal supplier - 5,370 megaliters; trucked water - 0 megaliters).</i>	Nurturing Our Planet	SDG: 6 UNGC: 6, 9	See Comments in Note under Description.

### Environmental | Biodiversity

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	<a href="#">Global Policy on Deforestation</a>
304-3	Habitats protected or restored		SDG: 6, 12, 14, 15 UNGC: 7, 8, 9	<a href="#">Global Policy on Deforestation</a>
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

### Environmental | Emissions

305-1	Direct (Scope 1) GHG emissions <i>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.</i>	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	<a href="#">2018 data reported to CDP</a> ; 2019 data not yet available

## TOPIC-SPECIFIC STANDARDS

### Environmental | Emissions (continued)

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
305-3	Other indirect (Scope 3) GHG emissions	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	<a href="#">2018 data reported to CDP</a> ; 2019 data not yet available
305-4	GHG emissions intensity	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15	
305-5	Reduction of GHG emissions	Nurturing Our Planet	SDG: 12, 13, 14, 15 UNGC: 7, 8, 9	
305-6	Emissions of ozone-depleting substances (ODS)	Nurturing Our Planet	SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	<a href="#">Global Sustainability Commitments</a>

### Environmental | Effluents and Waste

306-1	Water discharge by quality and destination	Nurturing Our Planet	SDG: 3, 6, 12, 13, 14, 15 UNGC: 7, 8, 9	<a href="#">2018 data reported to CDP</a> ; 2019 data not yet available
306-2	Waste by type and disposal method	Nurturing Our Planet	SDG: 3, 6, 12, 13, 14, 15 UNGC: 7, 8, 9	<a href="#">Food Loss and Waste Methodology</a>
306-3	Significant spills		SDG: 3, 6, 12, 13, 14, 15 UNGC: 7, 8, 9	None
306-4	Transportation of hazardous waste		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	None
306-5	Water bodies affected by water discharge and/or runoff		SDG: 6, 12, 13, 14, 15 UNGC: 7, 8, 9	None

### Environmental | Compliance

307-1	Non-compliance with environmental laws and regulations		SDG: 12, 13, 14, 15, 16	None
-------	--	--	-------------------------	------

## TOPIC-SPECIFIC STANDARDS

### Environmental | Supplier Environmental Assessment

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
308-1	New suppliers that were screened using environmental criteria		SDG: 13 UNGC: 7, 8, 9	100 percent
308-2	Negative environmental impacts in the supply chain and actions taken		SDG: 13 UNGC: 7, 8, 9	<a href="#">Global Palm Milestones Responsible Sourcing Milestones</a>

### Social | Employment

401-1	New employee hires and employee turnover		SDG: 5, 8 UNGC: 6	Kellogg does not currently collect this information globally.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees		UNGC: 6	Kellogg does not currently collect this information globally.
401-3	Parental leave		SDG: 5, 8 UNGC: 6	Kellogg does not currently collect this information globally.

### Social | Labor/Management Relations

402-1	Minimum notice periods regarding operational changes		SDG: 8 UNGC: 3, 6	Notice periods vary by contract and/or local regulation. We always comply with local regulations and have had no actions brought against the company for violation of notice periods.
-------	--	--	----------------------	---

## TOPIC-SPECIFIC STANDARDS

### Social | Occupational Health and Safety

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
403-1	Occupational Health and safety management system <i>Note: Kellogg has 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.</i>	Living Our Founder's Values	SDG: 3, 8	See Comments in Note under Description.
403-2	Hazard identification, risk assessment and incident investigation <i>Note: 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.</i>	Living Our Founder's Values	SDG: 3, 8 UNGC: 6	See Comments in Note under Description.
403-3	Occupational health services <i>Note: We have comprehensive occupational health elements as part of our overall Employee Health and Safety Management System. Our EHS Management 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 audited every two years.</i>	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	See Comments in Note under Description.

## TOPIC-SPECIFIC STANDARDS

### Social | Occupational Health and Safety (continued)

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
403-4	<p>Worker participation, consultation and communication on occupational health and safety</p> <p><i>Note: The mission of Employee Health and Safety at Kellogg is to deliver value through a culture that embraces the belief that all injuries are preventable, 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.</i></p>	Living Our Founder's Values	SDG: 3, 8 UNGC: 3	See Comments in Note under Description.
403-5	<p>Worker training on occupational health and safety</p> <p><i>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.</i></p>	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.



## TOPIC-SPECIFIC STANDARDS

### Social | Occupational Health and Safety (continued)

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
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: Investing in our People	SDG: 3, 8 UNGC: 3	
403-10	Work-related ill health	Living Our Founder's Values: Investing in our People	SDG: 3, 8 UNGC: 3	

### Social | Training and Education

404-1	Average hours of training per year per employee	Living Our Founder's Values	SDG: 5, 8 UNGC: 6	9.2 hours
-------	---	-----------------------------	----------------------	-----------

### Social | Diversity and Equal Opportunity

405-1	Diversity of governance bodies and employees	Living Our Founder's Values	SDG: 5 UNGC: 6	<a href="#">Features Diversity &amp; Inclusion Annual Report Proxy</a>
405-2	Ratio of basic salary and remuneration of women to men <i>Note: At Kellogg, we are committed to accelerating gender equity to increase female representation across all areas of the business. Kellogg has adopted the seven Women's Empowerment Principles, which emphasize corporate action to promote gender equity and women's empowerment.</i>		SDG: 5, 8, 10 UNGC: 6	See Comments in Note under Description.

## TOPIC-SPECIFIC STANDARDS

### Social | Non-discrimination

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
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 | Freedom 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	<a href="#">Global Supplier Code of Conduct</a>
-------	--	--	-------------------------	---

### Social | Child Labor

408-1	Operations and suppliers at significant risk for incidents of child labor	Living Our Founder's Values	SDG: 3,4 UNGC: 1, 2, 5	<a href="#">Global Supplier Code of Conduct</a>
-------	---	-----------------------------	---------------------------	---

### Social | Forced or Compulsory Labor

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	<a href="#">Global Supplier Code of Conduct</a>
-------	--	-----------------------------	-------------------------	---

### Social | Security Practices

410-1	Security personnel trained in human rights policies or procedures		SDG: 16 UNGC: 1, 2	100 percent
-------	---	--	-----------------------	-------------

### Social | Indigenous Rights

411-1	Incidents of violations involving rights of indigenous peoples		SDG: 2 UNGC: 1, 2	<a href="#">Palm Oil Grievance Tracker</a> <a href="#">Global Palm Milestones</a>
-------	--	--	----------------------	--

## TOPIC-SPECIFIC STANDARDS

### Social | Human Rights Assessment

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
412-1	<p>Operations that have been subject to human rights reviews or impact assessments</p> <p><i>Note: Some Kellogg operations had human rights performance assessments completed by customers in 2018 with no findings. We continue to strengthen our engagement on and support of human rights with our supply partners and for their supply chains. The consequences of violating or failing to meet our standards will result in removal from our supply chain.</i></p>	Living Our Founder's Values	SDG: 1, 3, 5, 11, 12 UNGC: 1, 2	See Comments in Note under Description. <a href="#">Corporate Human Rights Benchmark</a> <a href="#">Know the Chain</a>
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.
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.
Social   Local Communities				
413-1	Operations with local community engagement, impact assessments and development programs	Feeding People In Need; Nurturing Our Planet; Living Our Founder's Values	SDG: 1, 2 UNGC: 1, 2	Kellogg supports the communities where it has 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 local communities		SDG: 1, 2 UNGC: 1, 2	None

## TOPIC-SPECIFIC STANDARDS

### Social | Supplier Assessment for Labor Practices

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
414-1	New suppliers that were screened using labor practices criteria	<b>Living Our Founder's Values</b>	SDG: 1, 5, 8, 16 UNGC: 1, 2	100 percent <a href="#">Global Supplier Code of Conduct</a>
414-2	Negative social impacts in the supply chain and actions taken		SDG: 1, 5, 8, 16 UNGC: 1, 2	<a href="#">Global Palm Milestones</a>

### Social | Public Policy

415-1	Political contributions		SDG: 16 UNGC: 10	<a href="#">Corporate Political Expenditures Political Contributions Policy</a>
-------	-------------------------	--	---------------------	---

### Social | Customer (Consumer) Health and Safety

416-1	Assessment of the health and safety impacts of product and service categories	<b>Nourishing With Our Foods</b>	SDG: 3	<a href="#">Nutrition Milestones Access to Nutrition Index</a>
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		SDG: 3	None

### Social | Marketing and Labeling

417-1	Requirements for product and service information and labeling	<b>Nourishing With Our Foods</b>	SDG: 12, 16	
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		SDG: 3, 12	None

### Social | Customer (Consumer) Privacy

418-1	Substantiated complaints concerning breaches of customer (consumer) privacy and losses of customer (consumer) data		SDG: 16	None
-------	--	--	---------	------

## TOPIC-SPECIFIC STANDARDS

### Social | Socioeconomic Compliance

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
419-1	Non-compliance with laws and regulations in social and economic area			None

## FOOD PROCESSING SECTOR STANDARDS

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
FP1	Percentage of purchased volume from suppliers compliant with company's sourcing policy	Nourishing With Our Foods, Nurturing Our Planet, Living Our Founder's Values	UNGC: 7, 8	100 percent
FP2	Percentage of purchased volume which is verified as being in accordance with credible, internationally recognized responsible production standards, broken down by standard <i>Note: We have environmental and social requirements for purchasing all our major ingredients. For some, we source in accordance with internationally recognized standards such as RSPO and Fair Trade. However, as a grain-based company, those represent a very low percentage of our total volume of ingredients purchased. We continue to work with our suppliers to responsibly source and sustainably grow our ingredients.</i>	Nourishing With Our Foods, Nurturing Our Planet, Living Our Founder's Values	SDG: 2, 12, 14, 15	See Comments in Note under Description. <a href="#">Responsible Sourcing Milestones</a>
FP3	Percentage of working time lost due to industrial disputes, strikes and/or lock-outs, by country		SDG: 8	None
FP4	Nature, scope and effectiveness of any programs and practices (in-kind contributions, volunteer initiatives, knowledge transfer, partnerships and product development) that promote access to healthy lifestyles; the prevention of chronic disease; access to healthy, nutritious and affordable food; and improved welfare for communities in need	Included throughout report	SDG: 2, 3	
FP5	Percentage of production volume manufactured in sites certified by an independent third-party according to internationally recognized food safety management system standards	Nourishing With Our Foods, Living Our Founder's Values	SDG: 2	100 percent
FP6	Percentage of total sales volume of consumer products, by product category, that are lowered in saturated fat, trans fats, sodium and added sugars	Nourishing With Our Foods	SDG: 2	In cereals, since 2011, Kellogg has reduced either sodium or sugar or both in 80% of our cereal portfolio. <a href="#">Nutrition Milestones</a>

## FOOD PROCESSING SECTOR STANDARDS

Disclosure	Description	Section (Visit the indicated section of our <a href="#">online report</a> .)	Cross Reference	Links/Comments
FP7	Percentage of total sales volume of consumer products, by product category, that contain increased nutritious ingredients like fiber, vitamins, minerals, phytochemicals or functional food additives	Nourishing With Our Foods	SDG: 2	In cereals, since 2011, 100% of our cereals contribute at least one nutrient of need, including fiber, protein or micronutrients. <a href="#">Nutrition Milestones</a>
FP8	Policies and practices on communication to consumers about ingredients and nutritional information beyond legal requirements	Nourishing With Our Foods; Feeding People In Need	SDG: 2	
FP9-13	Animal Welfare <i>Note: As a grain-based company that uses very few animal products in our foods, this indicator is not material to our business. However, we embrace the important role we play in influencing responsible and sustainable behavior throughout our supply chain. While we do not raise or process animals in our production facilities, we are committed to continuously working with our suppliers to ensure their animals are properly cared for throughout their lives.</i>		SDG: 2, 15	See Comments in Note under Description. <a href="#">Animal Welfare Commitment</a> <a href="#">Responsible Sourcing</a> <a href="#">Milestones</a>