

2021/2022 GLOBAL REPORTING INITIATIVE (GRI) INDEX

(Published August 2022)



[Standard Disclosures](#)

[Topic-Specific Standards](#)

STANDARD DISCLOSURES				
General Disclosures Organization Profile				
Disclosure	Description	Section (Visit the indicated section of our ESG report.)	Cross Reference	Links/Comments
102-1	Name of the organization			Kellogg Company
102-2	Activities, brands, products and services			Annual Report Our commitments and our progress against our ESG commitments exclude our consolidated and unconsolidated joint ventures in West Africa and China.
102-3	Location of headquarters			Battle Creek, Michigan, USA
102-4	Location of operations			Annual Report
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			Kellogg has approximately 29,000 employees globally. The gender breakdown of employees by type of role is included within our Features Diversity & Inclusion Annual Report .
102-9	Supply chain			Annual Report



STANDARD DISCLOSURES

General Disclosures | Organization Profile (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
102-10	Significant changes to the organization and its supply chain <i>Note: In June 2022, Kellogg Company announced a plan approved by our Board of Directors to separate two of our business as a bold next step in transforming our portfolio. By the end of 2023, Kellogg Company will separate into three independent public companies, each better positioned to unlock their full potential: A global snacking company, North American cereal company and plant-based foods company. We'll continue to share more about this transformation at www.unleashingourpotential.com.</i>			See Comments in Note under Description
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 Disclosures | Strategy

102-14	CEO Statement	Message from our CEO		
102-15	Key impacts, risks and opportunities			Annual Report

General Disclosures | Ethics and Integrity

102-16	Values, principles, standards and norms of behavior		SDG: 16	Our refreshed Global Code of Ethics is available online 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)

STANDARD DISCLOSURES

General Disclosures | Governance Structure

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
102-18	Governance structure			10-K , Proxy
102-19	Delegating authority <i>Note: Kellogg Company's Social Responsibility and Public Policy Committee of the Board of Directors oversees our corporate responsibility strategy. The Audit Committee oversees ethics and compliance.</i>			See Comments in Note under Description
102-20	Executive-level responsibility for economic, environmental and social topics <i>Note: 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.</i> <i>In addition, Kellogg has created a Global ESG Council and regional ESG Councils. The Councils ensure execution on priority strategies to maximize ESG performance, share best practices, establish a governance mechanism to review new and revised commitments, and ensure we are progressing against our commitments.</i>			See Comments in Note under Description
102-21	Consulting stakeholders on economic, environmental and social topics	Included throughout report	SDG: 16	Human Rights Milestones Responsible Sourcing Milestones Partnerships 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	Proxy
102-24	Nominating and selecting the highest governing body		SDG: 5, 16	Proxy
102-25	Conflicts of interest		SDG: 16	Proxy
102-26	Role of the highest governance body in setting purpose, values and strategy			Proxy

STANDARD DISCLOSURES

General Disclosures | Governance Structure (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
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 impacts	Materiality assessment	SDG: 16	Annual 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 & Public Policy Committee of the Board of Directors oversees our corporate responsibility strategy.
102-33	Communicating critical concerns			Critical concerns are communicated to the Social Responsibility & Public Policy Committee of the Board of Directors
102-34	Nature and total number of critical concerns			The Social Responsibility & Public Policy Committee of the Board of Directors addresses the following key topics. Details are considered confidential. <ul style="list-style-type: none"> • Public policy • Government relations • Regulatory matters • Philanthropic activities/charitable contributions • Sustainability efforts and climate policy • Related topics
102-35	Remuneration policies			Proxy
102-36	Process for determining remuneration			Proxy

STANDARD DISCLOSURES

General Disclosures | Governance Structure (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
102-37	Stakeholders' involvement in remuneration		SDG: 16	Proxy
102-38	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.)			Proxy

General Disclosures | Stakeholder Engagement

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

General Disclosures | 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		
102-47	List of material topics	Materiality assessment		
102-48	Restatements of information			None
102-49	Changes in reporting			None
102-50	Reporting period			The information primarily covers 2021 activities. It also includes a few examples of ESG efforts from late 2020 to early 2022.
102-51	Date of most recent report			2021

STANDARD DISCLOSURES

General Disclosures | Reporting Practice (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
102-52	Reporting cycle			Kellogg Company intends to continue publishing an annual ESG Report.
102-53	Contact point for questions regarding the report			https://www.kelloggs.com/en_US/contact-us.html
102-54	Claims of reporting in accordance with the GRI Standards			Core
102-55	GRI content index			GRI Index
102-56	<p>External assurance</p> <p>Note:</p> <ul style="list-style-type: none"> • <i>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.</i> • <i>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.</i> 			See Comments in Note under Description

General Disclosures | Management Approach

103-1	Explanation of the material topic and its boundary	Materiality assessment	SDG: 13, 14, 15	
103-2	The management approach and its components	Policies, Positions and Milestones		
103-3	Evaluation of the management approach	Policies, Positions and Milestones		

TOPIC-SPECIFIC STANDARDS

Economic | Economic Performance

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
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 climate change		SDG: 13	Annual Report 2021 data reported to CDP
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 | 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

Economic | Procurement/Sourcing Practices

204-1	Proportion of spending on local suppliers	Sustainability/Responsible Sourcing	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
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Economic | Anti-Corruption

205-1	Operations assessed for risks related to corruption		SDG: 16 UNGC: 10	Select leaders and managers in 100% of our global operations participate in our annual Enterprise Risk Assessments that address fraud, anti-corruption compliance and management of third-party intermediaries.
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TOPIC-SPECIFIC STANDARDS

Economic | Anti-Corruption (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
205-2	Communication and training about anti-corruption policies and procedures		SDG: 16	Included in targeted 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.

Economic | Anti-competitive Behavior

206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		SDG: 16	Global Code of Ethics Palm Oil Milestones Global Supplier Code of Conduct
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Economic | Tax

207-1	Approach to tax			Tax Policy and objectives
207-2	Tax governance, control and risk management			10-K

Environmental | Materials

301-1	Materials used by weight or volume		SDG: 8, 12 UNGC: 7, 8	Responsible Sourcing Milestones Packaging Milestones
301-2	Recycled input materials used		SDG: 8, 12 UNGC: 7, 8, 9	<ul style="list-style-type: none"> 94% of timber-based packaging is from recycled or certified-virgin sustainable sources (FSC, PEFC, SFI) 72% of global timber-based packaging comes from recycled content Packaging Milestones

Environmental | Energy

302-1	Energy consumption within the organization		SDG: 7, 8, 12, 13 UNDC: 7, 8, 9	2021 data reported to CDP
302-3	Energy intensity		SDG: 7, 8, 12, 13 UNDC: 7, 8, 9	2021 data reported to CDP Climate Milestones
302-4	Reduction of energy consumption	Sustainability/Renewable Energy	SDG: 7, 8, 12, 13 UNDC: 7, 8, 9	2021 data reported to CDP Energy conservation

TOPIC-SPECIFIC STANDARDS

Environmental | Water

Disclosure	Description	Section (Visit the indicated section of our ESG report.)	Cross Reference	Links/Comments
303-1	Interactions with water as a shared resource		SDG: 6 UNGC: 7, 8, 9	2021 data reported to CDP Water Risk Assessment
303-3	Water withdrawal		SDG: 6 UNGC: 7, 8, 9	2021 data reported to CDP Water Risk Assessment
303-4	Water discharge <i>Note: Total effluent from manufacturing 2021: 9,065 megaliters. Breakdown by destination is not available.</i>		SDG: 6 UNGC: 6, 9	See Comments in Note under Description
303-5	Water consumption <i>Note: Total water use in 2021 from manufacturing: 10,913 megaliters (groundwater = 1,820 megaliters; municipal supplier = 9092 megaliters). Total water use in 2021 from high water risk manufacturing locations: 6,018 megaliters (groundwater = 984 megaliters; municipal supplier = 5,034 megaliters).</i>		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	Our facilities are in urban settings, including industrial parks, and we have no agroforestry or agriculture-owned operations.
304-2	Significant impacts of activities, products, and services on biodiversity		SDG: 6, 14, 15 UNGC: 7, 8, 9	Deforestation Policy Supporting Biodiversity Palm Oil Milestones Responsible Sourcing Milestones
304-3	Habitats protected or restored		SDG: 6, 12, 14, 15 UNGC: 7, 8, 9	Deforestation Policy Supporting Biodiversity 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 for Kellogg-owned facilities.

TOPIC-SPECIFIC STANDARDS

Environmental | Emissions

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
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>		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	See Comments in Note under Description
305-2	Energy indirect (Scope 2) GHG emissions		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	2021 data reported to CDP
305-3	Other indirect (Scope 3) GHG emissions		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	2021 data reported to CDP
305-4	GHG emissions intensity		SDG: 12, 13, 14, 15 UNGC: 7, 8, 9	2021 data reported to CDP
305-5	Reduction of GHG emissions		SDG: 12, 13, 14, 15 UNGC: 7, 8, 9	2021 data reported to CDP

Environmental | Effluents and Waste

306-1	Waste generation and significant waste-related impacts		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	Food Loss and Waste Position Statement/Methodology
306-2	Management of significant waste-related impacts		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	Food Loss and Waste Position Statement/Methodology
306-3	Waste generated		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	In tonnes: Total Waste to Landfill: 24,381 Total Anaerobic Digestion: 3,618 Total Bio-Recycling: 4,480 Total Composting: 3,067 Total External WWTP: 358 Total Animal Feed Waste: 225,114 Total Fermentation: 595 Total Incinerated: 4,020 Total Land Application: 5,570 Total Recycled: 37,679 TOTAL WASTE: 308,886

TOPIC-SPECIFIC STANDARDS

Environmental | Effluents and Waste (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
306-4	Waste diverted from landfill		SDG: 3, 12, 13, 14, 15 UNGC: 7, 8, 9	In tonnes: Total Anaerobic Digestion: 3,618 Total Bio-Recycling: 4,480 Total Composting: 3,067 Total External WWTP: 358 Total Animal Feed Waste: 225,114 Total Fermentation: 595 Total Land Application: 5,570 Total Recycled: 37,679
306-5	Waste directed to disposal		SDG: 6, 12, 13, 14, 15 UNGC: 7, 8, 9	In tonnes: Total Waste to Landfill: 24,381 Total Incinerated: 4,020

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.
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Environmental | Supplier Environmental Assessment

308-1	New suppliers that were screened using environmental criteria		SDG: 13 UNGC: 7, 8, 9	100%
308-2	Negative environmental impacts in the supply chain and actions taken		SDG: 13 UNGC: 7, 8, 9	Global Palm Milestones Deforestation Policy Responsible Sourcing Milestones

Social | Employment

401-1	New employee hires and employee turnover <i>Note: Kellogg hired 3,719 employees in 2021. Total employee turnover in 2021 for North America, Latin America, Asia Pacific and Europe was 16.9%. This excludes data from China, Brazil and Turkey.</i>		SDG: 5, 8 UNGC: 6	See Comments in Note under Description
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees		UNGC: 6	Global Wellbeing Milestones
401-3	Parental leave		SDG: 5, 8 UNGC: 6	2017 Features Report

TOPIC-SPECIFIC STANDARDS

Social | Labor/Management Relations

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
402-1	<p>Minimum notice periods regarding operational changes</p> <p><i>Note: 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.</i></p>		SDG: 8 UNGC: 3, 6	See Comments in Note under Description

Social | Occupational Health and Safety

403-1	<p>Occupational Health and safety management system</p> <p><i>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 62 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></p>		SDG: 3, 8	See Comments in Note under Description
403-2	<p>Hazard identification, risk assessment and incident investigation</p> <p><i>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.</i></p>		SDG: 3, 8 UNGC: 6	See Comments in Note under Description
403-3	<p>Occupational health services</p> <p><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 to three years.</i></p>		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 ESG report .)	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 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.</i></p>		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. At Kellogg, safety is not proprietary. We learn, listen and remain curious to further strengthen our EHS Center of Excellence.</i></p>		SDG: 3, 8 UNGC: 3	See Comments in Note under Description
403-6	Promotion of worker health		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		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		SDG: 3, 8 UNGC: 3	All workers are covered by our Global Employee Health & Safety Management System.
403-9	Work-related injuries		SDG: 3, 8 UNGC: 3	Global Total Reportable Incident Rate (TRIR): 0.42
403-10	Work-related ill health		SDG: 3, 8 UNGC: 3	Global Total Lost Time Incident Rate (LTIR): 0.22 There were no fatalities in 2021.

TOPIC-SPECIFIC STANDARDS

Social | Training and Education

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
404-1	<p>Average hours of training per year per employee</p> <p><i>Note: Kellogg believes that "people must be our competitive advantage." As such we believe in investing in the training and development of our employees. We do this through many vehicles such as LinkedIn learning courses that are free to employees, 1:1 coaching with managers, skip-level coaching with second-level managers, cross functional mentorship, leadership trainings, compliance trainings, cultural diversity training, IT training and OHS trainings, to name a few.</i></p>		SDG: 5, 8 UNGC: 6	<i>13 average hours per employee</i> See Comments in Note under Description
404-2	<p>Programs for upgrading employee skills and transition assistance programs</p> <p><i>Note: In addition to the work our Learning and Development team does to provide training opportunities, our Business Employee Resource Groups also provide regional and company-wide trainings to provide equitable training and awareness to all employees.</i></p>			See Comments in Note under Description
404-3	<p>Percentage of employees receiving regular performance and career development reviews</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> <i>We have embedded our Talent Philosophy as a mechanism to provide clear and actionable guidelines to manage and develop talent. It includes guidelines for how we manage performance: <ul style="list-style-type: none"> <i>We give candid, constructive feedback on a regular basis</i> <i>We differentiate performance and pay</i> <i>We assess performance on both results and behaviors</i> </i> <i>To support this, we moved from a 3-point to a 5-point scale with more specific definitions on both the objectives to be accomplished (the "what") and the way work is done (the "how"). There is now a stronger link between performance and compensation where high performers are rewarded higher than average- and lower-performers. Ongoing employee education from multiple learning resources were available to further embed this change through videos, e-learning, job aids, live and virtual training sessions, and communication on the corporate intranet. There also is a renewed focus on goal setting to help managers and employees raise the bar. Ongoing performance and development conversations were used to track employee progress against goals — with formal mid-year and year-end conversations. The mandatory "People Goal" was instituted to reinforce the importance ongoing coaching and feedback for managers.</i> <i>Our competency model also provides direction and allows for improvement in the quality of feedback shared by managers and employees. We have increased visibility of "People Goal" adoption for all people managers and have outlined specific outcome-based metrics to measure people manager effectiveness against established competencies for leaders.</i> 			100% See Comments in Note under Description

TOPIC-SPECIFIC STANDARDS

Social | Diversity and Equal Opportunity

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
405-1	Diversity of governance bodies and employees		SDG: 5, 8 UNGC: 6	Features Diversity & Inclusion Annual Report Proxy
405-2	Ratio of basic salary and remuneration of women to men Notes: <i>Global</i> <i>Executive level (base salary only) = 0.94</i> <i>Executive level (base salary + other cash incentives) = 0.890</i> <i>Management level (base salary only) = 0.92</i> <i>Management level (base salary + other cash incentives) = 0.92</i> <i>Non-management level = 0.93</i>		SDG: 5, 8, 10 UNGC: 6	See Comments in Note under Description

Social | Non-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.
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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	Global Supplier Code of Conduct
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Social | Child Labor

408-1	Operations and suppliers at significant risk for incidents of child labor		SDG: 3, 4 UNGC: 1, 2, 5	Global Supplier Code of Conduct
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Social | Forced or Compulsory Labor

409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor		SDG: 8 UNGC: 1, 2, 4	Human Rights Milestones
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Social | Security Practices

410-1	Security personnel trained in human rights policies or procedures		SDG: 16 UNGC: 1, 2	100%
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TOPIC-SPECIFIC STANDARDS

Social | Indigenous Rights

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
411-1	Incidents of violations involving rights of indigenous peoples		SDG: 2 UNGC: 1, 2	Palm Oil Grievance Tracker Palm Oil Milestones

Social | Human Rights Assessment

412-1	<p>Operations that have been subject to human rights reviews or impact assessments</p> <ul style="list-style-type: none"> <i>In 2020, we partnered with external consulting group ELEVATE to review our internal manufacturing operations and T1 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.</i> <i>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.</i> 		SDG: 1, 3, 5, 11, 12 UNGC: 1, 2	Human Rights Policy
412-2	Employee training on human rights policies or procedures		SDG: 1, 3, 5, 11, 12 UNGC: 1, 2	Included in global Employee Code of Ethics training. We also highlighted the Human Rights Policy in targeted communications.
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		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. Human Rights Milestones Responsible Sourcing Milestones
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TOPIC-SPECIFIC STANDARDS

Social | Local Communities (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
413-2	Operations with significant actual and potential negative impacts on local communities		SDG: 1, 2 UNGC: 1, 2	Global Code of Ethics Palm Oil Grievance Tracker Palm Oil Milestones Deforestation Policy Human Rights Milestones

Social | Supplier Assessment for Labor Practices

414-1	New suppliers that were screened using labor practices criteria		SDG: 1, 5, 8, 16 UNGC: 1, 2	95% of in-scope suppliers have registered and linked all Kellogg supplying sites with Kellogg. In-scope is defined as the Top Global 80% spend and all high-risk category suppliers. Human Rights Milestones Global Supplier Code of Conduct
414-2	Negative social impacts in the supply chain and actions taken		SDG: 1, 5, 8, 16 UNGC: 1, 2	Global Code of Ethics Deforestation Policy Palm Oil Grievance Tracker Human Rights Milestones

Social | Public Policy

415-1	Political contributions		SDG: 16 UNGC: 10	Corporate Political Expenditures Political Contributions Policy
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Social | Customer (Consumer) Health and Safety

416-1	Assessment of the health and safety impacts of product and service categories		SDG: 3	Wellbeing Milestones Access to Nutrition Index
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		SDG: 12, 16	Wellbeing Milestones Childhood Wellbeing Promise
417-2	Incidents of non-compliance concerning product and service information and labeling		SDG: 3, 12	None

TOPIC-SPECIFIC STANDARDS

Social | Marketing and Labeling (continued)

Disclosure	Description	Section (Visit the indicated section of our ESG report .)	Cross Reference	Links/Comments
417-3	<p>Incidents of non-compliance concerning marketing communications <i>Note: In 2021, Kellogg Company identified the following violations that have since been remedied:</i></p> <ul style="list-style-type: none"> <i>In France, we received a challenge by authorities on on-pack labeling of vitamins and minerals in the ingredients list. They have been previously listed under a separate header at the end of the list and authorities required moving them for inclusion in the decreasing order of presence of ingredients list.</i> <i>In 2021 Trading Standards, U.K. identified a label value variance on Kellogg's Special K cereal with iron testing at levels over the declared label amount. A cause was identified and the issue corrected with a target implementation date of EOY 2022.</i> <i>A 2021 ASA (UK) report stated it had found one unique Pringles ad which had been shown on two occasions on YouTube channel VSauce. Although the VSauce channel was found not to have been commissioned for, or to directly target children, it did feature educational videos and an under-18 audience of over 35% based on Comscore desktop only data. The report acknowledged the violation was an isolated incident. Kellogg's view is that the analysis of desktop only data is a distortive sample of devices which does not factor in laptops, mobile devices, TV or table devices. Therefore, Kellogg does not agree with the ASA report conclusion.</i> <i>In Mexico, the Consumer Protection Agency and Ministry of Health stated that the regulator's criteria exceeded the new regulation's provisions and requested modifications on several products' labeling. Observations and changes were focused on the calories stamps, characters and claims.</i> <i>In Brazil, the Consumer Protection Agency filed a civil claim against several companies in the food industry, claiming that their labels' gluten references were insufficient and should be modified, regardless of the language of the regulation. There was also a case of differences in net weight versus labeling, in which penalties were imposed and paid.</i> 		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
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Social | Socioeconomic Compliance

419-1	Non-compliance with laws and regulations in social and economic area		SDG: 16	None
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