

Policy Statement Prohibiting Involuntary Labor*

Revised May 22, 2024

Overview

Kellanova is a leader in global snacking, international cereal and noodles, and North America frozen foods, with a legacy stretching back more than 100 years. Powered by differentiated brands including *Pringles®*, *Cheez-It®*, *Pop-Tarts®*, *Kellogg's Rice Krispies Treats®*, *RXBAR®*, *Eggo®*, *MorningStar Farms®*, *Special K®*, *Coco Pops®*, and more, Kellanova's vision is to become the world's best-performing snacks-led powerhouse, unleashing the full potential of our differentiated brands and our passionate people. Our net sales for 2023 were \$13 billion.

At Kellanova, our purpose is to create better days and ensure everyone has a seat at the table through our trusted food brands. We are committed to promoting sustainable and equitable food access by tackling the crossroads of hunger, sustainability, wellbeing, and equity, diversity & inclusion. Our goal is to create Better Days for 4 billion people by the end of 2030 (from a 2015 baseline). We know we can only achieve our vision and purpose when we consider the greater impact of our foods all along our supply chain. We are firmly committed to being a responsible global corporate citizen and recognize our duty to support, promote and advance human rights within our operations and our supply chain.

Our Policy

Kellanova prohibits involuntary labor, including forced, indentured, bonded, slave or human-trafficked labor ("Involuntary Labor"), within our business operations and our supply chain. Involuntary labor is a pervasive and insidious global issue that directly and negatively impacts basic human rights. We are committed to protecting human rights and maintaining an ethical and transparent supply chain, free of Involuntary Labor. As part of doing so, we have embedded our commitment into our Global Supplier Code of Conduct ("Supplier Code") and Global Code of Ethics ("Employee Code").

- Our [Supplier Code of Conduct](#) prohibits suppliers from using or facilitating any type of Involuntary Labor. We reserve the right to terminate our contract with any supplier, at our sole discretion, for violations of our Supplier Code of Conduct.
- Our [Employee Code](#) requires employees to obey the law, act with integrity, show respect and do business with suppliers that embrace and demonstrate high standards of ethical business behavior. It requires diligence in determining whether our company and its suppliers conform to our standards, including prohibiting Involuntary Labor and discrimination. All employees are required to comply with the Employee Code; failure to do so can result in disciplinary action, up to and including termination.

Our position on human rights is compatible with the United Nations Universal Declaration of Human Rights, United Nations Guiding Principles, and the core conventions of the International Labour Organization. To further industry knowledge, collaboration and cooperation, Kellanova is a member of organizations such as AIM- PROGRESS and the Consumer Goods Forum.

**This policy statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act and the California Transparency in Supply Chain Act. It constitutes Kellanova's anti-slavery and human trafficking statement/disclosure and policy for the financial year ending December 31, 2023.*

Implementation Plan

Kellanova has developed a comprehensive, global corporate responsibility strategy identifying those issues most relevant to our company and stakeholders. Human rights are one of these issues. We believe it is our duty to continue educating our internal and external stakeholders on the important issue of Involuntary Labor. We do so by raising awareness of, increasing our focus on, and taking accountability for ensuring an ethical and transparent supply chain, free of Involuntary Labor. More information on our corporate responsibility strategy is available on our [Kellanova Better Days™ Promise website](#).

Within our operations, we are taking steps to ensure awareness, focus and accountability on this important issue.

- To ensure that our employees are aware of our policies, standards and expectations, we utilize interactive, immersive online training modules that highlight human rights issues like Involuntary Labor. We are also currently developing additional training courses on this and other human rights issues.
- To ensure the right focus, a more detailed training and discussion regarding the risks and implications of Involuntary Labor was presented to our global Procurement leaders and managers during our 2015 Global Procurement Summit.
- To ensure accountability, which is an important aspect of Kellanova's culture, our Ethics Office recently updated our Supplier Code and Employee Code to, among other things, raise awareness of Involuntary Labor. Our Ethics Office is a resource for clarification of company policy or for reporting issues related to ethics and compliance matters. Employees and suppliers are strongly encouraged to contact our [Ethics Hotline](#) to report any actual or suspected violations without fear of retaliation. The Hotline, which is operated by a third-party, confidential reporting company, is available immediately and anonymously 24/7 via telephone, internet or mobile app in 21 countries and in local languages.
- We use social and ethical compliance assessments of our own facilities to verify that Involuntary Labor does not exist within our operations.

Within our supply chain, we take a risk-based approach to determine which suppliers need additional awareness and education, or require verification of adherence to our policies, on this and other responsible sourcing issues.

- All suppliers are required to adhere to our Supplier Code, which is included in all new supplier contracts and agreement. This is a requirement for supplier selection. Should a critical violation of our policies, such as incidences of Involuntary Labor, be reported or uncovered, Kellanova has an escalation procedure in place to ensure rapid response and immediate mitigation and remediation of the issue.
- As part of our commitment to being a responsible global corporate citizen, we are committed to actively engaging with our suppliers and their value chain network to ensure vigilance and adherence to all company policies.

- In 2019, Kellogg Company partnered with [ELEVATE](#), an LRQA company, to develop a comprehensive long-term, data-driven responsible sourcing strategy that addresses salient rights risks within priority Tier 1 ingredient and packaging supply chains. For the first two phases of this program, we concentrated on segmentation and categorization of in-scope suppliers and risk assessments for prioritized Tier 1 supplier sites.
- We utilize the online supplier management platform [Sedex](#) to identify, verify and manage risks within our supply chain. Sedex uses hundreds of human rights indices to determine regional and sector specific levels of inherent risk. Based on these assessments, we are prioritizing our suppliers' risk and engaging those that fall into higher risk categories. Those that continue to indicate high levels of risk are targeted for independent, third-party social and ethical audits.

Future Plans

- Continue social and ethical accountability assessments within our own manufacturing operations. Continue to ensure that direct suppliers are engaged in Sedex to assess risk across the global supply chain.
- Continue to require any suppliers considered "high risk" to provide or complete a third-party social and ethical audit for verification of compliance with our Supplier Code.
- Continue internal and external awareness building and training on our commitment to ensuring a supply chain that is free of involuntary labor.

While Kellanova has yet to find any instances of Involuntary Labor in our operations or our supply chain, we remain committed to ongoing monitoring of both, as outlined in this policy.