

Kellanova 2024 Global Human Rights Milestones

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Our Commitment

In October 2023, Kellogg Company separated its North American cereal business and became Kellanova, a leading company in global snacking, international cereal and noodles, plant-based foods, and North American frozen breakfast. The name “Kellanova” signals our ambition for the future, building on the strong brand equity and legacy built over the previous 117 years as Kellogg Company. Like Kellogg Company, Kellanova believes that a key to running a good business is doing good for our communities, planet and people. Kellanova is proud to continue the Better Days Promise™ social and environmental purpose strategy set forth by Kellogg Company, while increasing our ambitions with expanded commitments.

Kellanova Better Days™ Promise is our commitment to advance sustainable and equitable access to food by actively addressing the intersection of wellbeing, hunger, sustainability and equity, diversity and inclusion (ED&I). In doing so, we are committed to creating better days for 4 billion people by the end of 2030 (from a 2015 baseline).

Globally, we have been working to protect and advance human rights for over a decade. As we have continued to strengthen our work in this area, in our own operations and direct and indirect supply chains, we have had the opportunity to partner with suppliers, industry peers, civil society, investors, and a broad range of stakeholders. We know that we can't achieve change alone. To tackle issues like modern slavery and forced labor, we need to continue to leverage best practices and support innovative solutions through continued collaboration.

To better communicate our responsibilities, commitments and expectations, our [Global Human Rights Policy](#) aligns with the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#). By taking a risk-based approach, we strive to ensure we are focusing on issues most relevant to our business and its operations where we can drive the most impact. Building on our global framework, Kellanova is using credible third-party data to further our understanding of these salient risks and identify actions we can take to better prevent, mitigate and remediate adverse human rights impacts. Unsurprisingly, these risks are not dissimilar to those faced by peer organizations who operate in the food, beverage and grocery sector, which is why collaboration is so important to address systemic issues geographically and within specific commodities. This report details our approach to protecting and advancing human rights within our operations and supply chain and outlines some of the key actions we are taking globally in response to identified and potential issues. You can learn more about our work [here](#).

Policies & External Alignment

Our Global Human Rights Policy highlights salient rights risks within our operations and global supply chain and details our strategy for prevention and mitigation. These risks were identified through a detailed internal materiality analysis and with the support of a third-party consulting firm, ELEVATE. This policy supplements our other foundational policies, the [Global Supplier Code of Conduct](#) and [Policy Statement Prohibiting Involuntary Labor](#), that guide our operations and inform our expectations for supplier and supply chain partnerships.

Furthermore, Kellanova supports all internationally recognized human rights as codified in the UNGPs, [International Bill of Human Rights](#) (including the [Universal Declaration of Human Rights](#)) and the eight International Labour Organization (ILO) core conventions as set out in the [Declaration on Fundamental Principles and Rights at Work](#).

As signatories, we are also committed to upholding the ten principles of the [United Nations Global Compact](#) and the [Women's Empowerment Principles](#). We also reference and follow the [OECD Guidelines for Multinational Enterprises](#). Kellanova believes these rights are inherent for all human beings and we acknowledge that they are interrelated, interdependent and indivisible. We are committed to ensuring our operations do not infringe upon the human rights of others and that, should adverse impacts be discovered, we will seek remediation aligned with our policies, international standards, and the expectations of our customers, consumers and stakeholders.

We also include training on our human rights policies and procedures in our ongoing training programs. For example, in 2025, 100% of our global salaried workforce will be required to complete training, regardless of whether they have previously done so.

"From our earliest days, we have been a purpose-driven organization. We've long believed and understood that a critical part of running a good business also is doing good for society. Today, as Kellanova, this vision continues to inspire our philanthropy, sustainability and social equity work. We work hard to make sure that our company and our business practices deliver benefits to people, to communities and to the planet. We take very seriously our commitments and our support of the communities we serve. It is the foundation of everything we do."

– Steve Cahillane, Chairman and CEO

Our Business

Kellanova is a global consumer goods company with manufacturing operations in 20 countries and products marketed in 180 countries.

We work with over 20,000 Tier 1 suppliers. Agricultural commodities – including corn, wheat, potato flakes, vegetable oils, sugar and cocoa – are the principal raw materials used in our products. Carton board, corrugated and plastic are our principal packaging materials.

Our principal products are snacks, such as crackers, savory snacks, toaster pastries, cereal bars, granola bars and bites, and convenience foods, such as ready-to-eat cereals, frozen waffles, veggie foods and noodles. We also steward a suite of international cereal brands.

These foods are sold to retailers through direct sales for resale to consumers. We use broker and distributor arrangements for certain products and channels, as well as less-developed market areas or in those market areas outside of our focus.

Our snacks brands are marketed under brands such as *Kellogg's*, *Cheez-It*, *Pringles*, *Austin*, *Parati* and *RXBAR*. Our cereals and cereal bars are generally marketed under the *Kellogg's* name. Our frozen foods are marketed under the *Eggo* and *MorningStar Farms* brands. Our international cereal brands include *Kellogg's Frosties*, *Zucaritas*, *Special K*, *Krave*, *Miel Pops*, *Coco Pops* and *Crunchy Nut*, among others.

Corporate Governance

At the board level, social issues are overseen by the Social Responsibility and Public Policy subcommittee of the Kellanova Board of Directors, which assists the Board in its oversight responsibilities of social and public policy issues.

At the executive level, human rights issues are overseen by the Chief Sustainability Officer, who reports to the Senior Vice President, Chief Global Corporate Affairs Officer. We also engage functions across the business such as Human Resources, Procurement, Environment Health & Safety and Legal to assess and track our global activities to inform our strategy and actions. Each group is involved in decisions related to issues such as child labor, forced labor, freedom of association and collective bargaining, health and safety, land rights, water and sanitation, and women's rights.

At the daily work level, these topics are managed collaboratively by our Corporate Affairs, Procurement, Legal, Human Resources and Supply Chain functions.







Accountability is an important aspect of the Kellanova corporate culture. Our Office of Ethics and Compliance serves as a resource for clarification of Company policy or reporting issues related to ethics and business conduct. Employees and suppliers are encouraged to contact the Ethics Office without fear of retribution or retaliation. We protect the confidentiality of all reporting sources.

Risk-Based Approach

We are committed to engaging and partnering with peers, customers, suppliers, NGOs, and stakeholders to find solutions to issues within our extended and overlapping global supply chains. We set clear expectations, seek to drive accountability, and assess potential and actual risk that our operations may cause or contribute to, both directly and indirectly.

Kellanova utilizes a combination of publicly available indices from reputable sources, including [Sedex Radar](#), to assess forced labor risk, and other salient risks, for supplier operations by region and commodity.

- Risk factors include regional location of operations, sector or commodity, degree of salience to industry identified issues, and supplier specific information.
- Targeted facilities are asked to complete a self-assessment questionnaire detailing policies and procedures related to labor practices to identify gaps that could indicate the possibility of, or potential for, human rights abuses or nonconformance.
- Targeted facilities are also subject to audits upon request.
- We primarily use the SMETA audit scheme, which includes on-site worker interviews based on the most recent methodology to determine the percentage of workers interviewed.
- Kellanova high-risk priority ingredients and sourcing countries combinations include the following according to [U.S. Department of Labor Bureau of International Labor Affairs \(ILAB\)](#), [AIM Progress](#), [Consumer Goods Forum](#), 3rd party partners, [Verite](#) and [Fair Labor Association \(FLA\)](#).

<p>Sugar Cane</p> <p>Brazil Colombia Thailand Mexico</p> 	<p>Cocoa</p> <p>Ghana Cote d'Ivoire</p> 	<p>Palm Oil</p> <p>Malaysia Indonesia</p> 
<p>Hazelnuts</p> <p>Türkiye</p> 	<p>Raisins and Sultanas</p> <p>Türkiye</p> 	<p>Rice</p> <p>Myanmar</p> 

Own Operations

40

Total Owned Facilities

12

Number of facilities audited in 2024

30%

Percentage of facilities audited in 2024

In 2024, Kellanova performed third-party SMETA audits at 12 facilities. As part of our ongoing efforts to identify, prevent, mitigate and remediate issues within our own operations, we are committed to expanding our audit capabilities on a risk-basis to ensure continued compliance with internal and international standards of human rights due diligence. At all facilities audited in 2024, no issues or indicators of forced labor, child labor, or bonded labor were found.

Supply Chain Operations

IN-SCOPE SUPPLIERS REGISTERED WITH SEDEX

87%

North America

80%

AMEA

80%

Europe

98%

Latin America

As of December 2024, 86% of global in-scope suppliers registered with the Sedex platform. This aids Kellanova to more accurately track Tier 1 supply chain locations and assess current audit status, including open non-conformances or pending actions. We utilize the Sedex platform to assess risk and determine due diligence practices to carry out with select suppliers. In-scope refers to suppliers within the Top 80% spend profile, all high-risk commodity suppliers, and high-risk indirect services.

Grievance Mechanism – Kellanova Ethics Line

We provide multiple resources for our employees to report any suspected violations of our values, Code of Ethics or Supplier Code of Conduct. Employees can discuss any concerns with their managers or Human Resources representatives and are encouraged to submit concerns or reports of incidents via the Kellanova Ethics Line, which is available 24/7 in multiple languages through a toll-free phone number and our website. The Ethics Line allows anonymous reporting, where permitted by law, and is operated by an independent third-party to provide employees, suppliers, contractor and the public with a platform to freely convey any issues.

Our [Ethics Reporting Line](#) provides toll-free numbers in jurisdictions around the world. The independent operator will listen to concerns or inquiries and submit a report with a complete written summary of the situation through the system to the Office of Ethics and Compliance for review, investigation and further action, as appropriate. The Kellanova Ethics Line toll-free numbers are available in our Code of Ethics and listed on Speak Up posters located around our facilities in local languages.

Our Ethics Line receives hundreds of reports every year. This indicates that our employees are empowered and encouraged to speak up when something isn't right. 100% of reports received through the Kellanova Ethics Line are reviewed by the Office of Ethics and Compliance and assigned for further appropriate actions. We value input from employees that help us improve our practices. Most reports pertain to Human Resources questions or Employment Relations matters, and all reports are investigated in accordance with our policies and investigation protocols. When necessary, we escalate significant issues to our Leadership Team. To encourage our employees to speak up, we maintain a non-retaliation policy to protect anyone who raises a concern, reports misconduct or participates in an investigation. If team members are suspected of retaliation, we enforce strict discipline measures, up to and including termination.

All reports are monitored and subject to review by the Office of Ethics and Compliance and where appropriate, matters may be reported to the Audit Committee. Most investigations can be completed quickly. Our goal is to complete investigations within 14-45 days. However, completion timelines may vary depending upon the complexity of the investigation. Lessons learned are leveraged to prevent and detect future misconduct, ensure compliance, and identify any other opportunities for improvement. In 2024, 100% of investigations were satisfactorily completed.

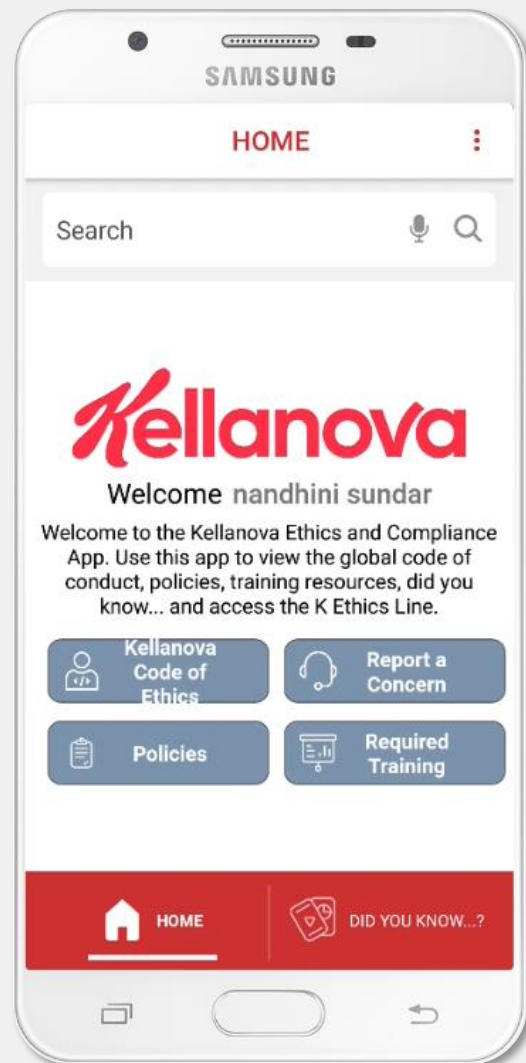
Another reporting mechanism available to our employees is the Kellanova Internal Employee Portal Information Center (EPIC). This portal provides employees with the ability to report and manage any people-related concerns or activities from 6 a.m. to 1 a.m. ET, Monday – Friday.

There were no reports of forced labor in 2024.

In addition to other methods of grievance reporting such as through email, hotline and direct reporting, the Kellanova Ethics Line mobile app allows users to anonymously report issues and track the progress and status of their complaint.

This app is available to anyone.

Aside from the ability to report concerns, the app also provides access to our Code of Conduct, relevant policies and training courses on various topics.



LRQA Supplier Assessment – 2019– 2024

In 2019, Kellanova partnered with [LRQA](#), 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.

Based on the initial segmentation results that identified 46 priority sites, Kellanova and LRQA partnered with 16 suppliers representing 27 site locations to administer four types of risk assessments. Overall, 30 assessments were deployed to gain a deeper understanding of potential and actual human rights risks present within our direct supply chain. For results and analysis, please see our 2020 [Human Rights Milestones Report](#).

- Worker Voice Survey:
 - Worker Sentiment Survey, or
 - Critical Issues Survey
- On-site Social Assessment – LRQA Responsible Sourcing Assessment (ERSA)
- Child Labor Self-Assessment Questionnaire (SAQ)

The assessment ran primarily from November 2020 through April 2021, with full site completion by the end of 2021.

In 2022, we kicked off phase three – remediation and capacity building – with participating supplier sites. The goal for the remediation and capacity building engagements was to help each site understand the results of the specialized assessment, build internal capacity to manage and further investigate risks, remediate identified issues, and implement effective preventive actions to mitigate future risk.

Opportunities for remediation were identified at all 27 sites. These opportunities were addressed in multiple ways, including evidence reviews, assigned e-learnings and capacity building. A time-bound action plan also was created for each site to inform root cause analysis and corrective actions, plus deadlines for actions. Project plans were completed for 21 sites, plans were incomplete for four sites, one site only completed the results discussion, and one site cancelled its participation. The remediation phase concluded at the end of 2022.

** Top 80% global spend suppliers plus all suppliers within high-risk categories for cocoa, palm oil, and sugar cane*

LRQA Supplier Assessment – 2019 2024 cont.

In 2023, we further advanced the program, from initially focusing on “priority” sites to “moderate” sites. This included nine additional Tier 1 suppliers across four countries, engaging over 900 workers. Three specialized tools were utilized, including a labor risks survey, critical issues survey and ERSA critical issues assessment. We also began assessing a select group of Tier 2 suppliers, ensuring our due diligence work went beyond our Tier 1 value chain.

A project plan template was created for each site to address survey/assessment findings. Capacity building calls were then held with each site. These formed the basis of a root cause analysis and informed site-specific corrective and preventative action plans. CAP managers approved the corrective actions and reviewed supporting evidence to close out open issues.

Each site was assigned e-learning based on the specific extreme and high-risk findings identified in the survey/assessment findings. Suppliers were expected to complete their e-learning on LRQA’s learning management system before developing the above CAP plans. Overall, the work was well-received by suppliers.

For 2024, we focused more intently on understanding the engagement practices raised in the Worker Voice and critical Issues Surveys of Tier 2 And Tier 2 suppliers. Overall, we heard from 3,962 workers at Tier 1 suppliers in Brazil, China, India, Malaysia, Mexico and Thailand and 468 workers across four Tier 2 suppliers. Kellanova utilizes the results of these surveys to encourage partnership with our supply chains; we work closely with each facility to discuss any critical issues, administer training, and carry out capacity building measures.



As part of our [responsible sourcing](#) goals for our priority ingredients, we directly invest in [Kellanova's Origins™](#) programs with farmers to remedy salient, adverse human rights impacts in the agricultural portion of our supply chain. This section provides 2024 case studies from *Kellanova's Origins™* created to promote and protect human rights at origin. Where relevant, these programs also provide funds or technical assistance to promote farmers' climate resilience and restore local ecosystems through improved agricultural practices.



Fair Labor Association

Every summer, tens of thousands of seasonal workers migrate across Türkiye to work in agricultural production. They travel as families, moving from crop to crop for six to eight months each year, harvesting in the fields. It is common for children to work alongside their parents, contributing to the household income – but at great cost to their development.

In 2020, Kellogg joined the [Fair Labor Associations’ \(FLA\) Harvesting the Future Project \(HTF\)](#) to advance our work in addressing human rights issues at origin and support the responsible sourcing of sultanas originating in Türkiye.

The Harvesting the Future (HTF) project grew from a vision to bring about far-reaching change in child protection and responsible recruitment to field workers by pursuing a “multi-sector, multi-stakeholder and multi-geography approach.” Companies that wanted to support meaningful and sustainable change for workers but were limited in creating a large-scale impact working on their own, joined forces through this project.

During 2020, we worked together with FLA to engage our suppliers in the project and commence a supply chain mapping and risk assessment process. Two of our sultana suppliers were already active in the project prior to us joining and have been involved from the start. Two additional sultana suppliers joined with our support. As a result of then Kellogg Company’s (today Kellanova) and others’ partnership, the project was able to engage with eight of the most prominent sultana suppliers in the region. Companies and suppliers, through risk assessments at the farm level, developed a shared commitment on six priority issues: child labor, including the risk level for various commodities; hazardous work by young workers; informality of employment relations; excessive working hours, including for children; lack of payment of minimum wages; and lack of access to basic services, such as water, hygiene, sanitation and child protection.

Fair Labor Association cont.

In June 2021, the HTF project kicked off Phase 2. Running through the end of 2023 this phase built on the assessments carried out during Phase 1 and focused on areas that were identified as high priority, including child protection and child labor remediation; elimination of hazardous work for workers under age 18; access to basic services for seasonal migrant families in agriculture; responsible recruitment and grievance mechanisms. Project highlights included:

- Online trainings to 48 supplier team members on worker rights in agriculture and internal monitoring processes.
- Field visits provided risk assessment and internal monitoring support by FLA's regional implementation partner.
- 12 trainings on decent work principles in seven cities reaching 204 members of the Agriculture Chamber.
- Specifically in 2023, 422 farmers were involved in pilot projects established to address child labor remediation, farm-level monitoring, responsible recruitment, health and safety, and grievance and living wages.

In 2024, we focused efforts more specifically with two suppliers, one actively engaged in internal monitoring and one without a field expert working at the company, to learn more about best practices. The intent was to dive more deeply into areas both of high risk for non-compliance and reinforcing areas in compliance. The supplier actively engaged in internal monitoring has in place a number of approaches that HTF can share with other suppliers to improve performance on the six priority issues. Conversely, by observing the supplier without a field expert overseeing processes, HTF has learned a great deal that will help encourage engagement among the entire supplier community.

Wild Asia

Kellanova's work with Wild Asia is creating strategic partnerships to further inclusive, resilient and nature-based value chains for sustainable palm oil. Working with multiple funding partners and SPIRAL (the Small Producer Inclusivity and Resilience Alliance), we have helped 3,348 smallholder palm oil farmers improve their livelihoods by increasing their access to market. These programs include training regenerative agricultural practices that increase yields and offer a path to MSPO- and RSPO-certified operations that demand higher market value. Already, 2,233 independent producers have achieved certification; 33% are women and 60% are native/indigenous people. Overtime, the goal is to extend these efforts to 10,000 small producers in six regions across Malaysia and Thailand.

AIM-Progress

Kellanova continues to work with AIM Progress to support our Human Rights Due Diligence Supply Chain work. In 2024, we joined with five other U.S.-based brands and initiated the creation of a remediation framework to address the concerning increase in cases of child labor violations and human trafficking in the U.S., particularly involving third-party labor providers in high-risk industries like manufacturing and food processing. Once complete, the framework will help AIM-Progress members and their suppliers bring together businesses, community organizations, schools, government entities and other stakeholders to address these issues and uphold human rights.

Enveritas/MESAD

Also in 2024, Kellanova supported the work of Enveritas and MESAD (the Movement for Education, Health, and Development) in the Republic of Côte d'Ivoire, part of our responsibly sourced cocoa supply chain. The NGO's built schools – three primary classrooms and one kindergarten classroom – that will serve hundreds of students over the years. Together, we also will train cocoa farmers on agricultural entrepreneurship, including sustainable agriculture and financial literacy. This important work will help increase the living income for 7,500 smallholder farmers, including 2,500 women farmers involved in the sustainable cocoa trade. It also will build long-term community capacity with the addition of computer technology and training of local professionals.

Moving Forward

As we continue our responsible sourcing journey and work to embed human rights due diligence into our operations and supply chains, we will continue to build awareness and share best practices regarding salient human rights issues. We remain committed to furthering our efforts to increase visibility and transparency into the lower tiers of our highest risk areas and commodities.

We will continue to seek partnership with our suppliers, peers and civil society to mitigate, remediate and prevent adverse human rights impacts within our value chain.

We know that the tools to build a sustainable and ethical supply base are often found through activities deemed to be "beyond compliance." We will strive to increase our efforts through robust policies and procedures to support the fair and appropriate representation of all affected stakeholders.

Policies

[Human Rights Policy](#)

[Forced Labor Policy](#)

[Deforestation Policy](#)

[Environment, Health and Safety Policy](#)

[Global Supplier Code of Conduct](#)

[Palm Oil Policy](#)

[Pay Equity](#)

CGF Priority Industry Principles On Forced Labor

Kellanova supports the CGF Priority Industry Principles on Forced Labour for both our own operations and those of our suppliers. As with other policies, we require the dissemination and adherence of these principles throughout our supply chain.

EVERY WORKER SHOULD HAVE FREEDOM OF MOVEMENT >>>>

NO WORKER SHOULD PAY FOR A JOB

NO WORKER SHOULD BE INDEBTED OR COERCED TO WORK

External membership

- [AIM-PROGRESS](#) – U.S Labor Conditions Working Group
- [Consumer Goods Forum](#) (CGF) – Multiple work groups including the Coalitions for Human Rights/Forced Labor and the Sustainable Supply Chain Initiative (SSCI)
- [Roundtable on Sustainable Palm Oil](#) (RSPO)
- [North American Sustainable Palm Oil Network](#)
- [United Nations Global Compact](#) (UNGC)
- [United Nations Women’s Empowerment Principles](#)
- [SEDEX](#)
- [Palm Oil Transparency Coalition](#)