Protecting, respecting and advancing human rights:

Kellanova 2025 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. Then, in August 2024, Mars, Incorporated entered into a definitive agreement to acquire Kellanova. The acquisition was complete in December 2025 and Kellanova is now part of the Mars Snacking business. This report addresses Kellanova operations throughout 2025.

The Kellanova Better Days™ Promise remains as 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 (UNGP). 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 uses 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 addressing systemic issues geographically and within specific commodities. This report details our approach to protecting and advancing human rights within our operations and supply chain. It also 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 human 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 UNGP, 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. In 2025, 100% of our global salaried workforce complete training.

"From our earliest days, Kellanova has been a purpose-driven organization. We've long believed and understood that a critical part of running a good business is doing good for society. This vision inspires our philanthropy, sustainability and social equity work. Kellanova supports business practices that deliver benefits to people, communities and the planet. We take very seriously our commitments and our support of the communities we serve. It is the foundation of everything we do."

– Janelle Meyers, Chief Sustainability Officer

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 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

As an independent, publicly held company throughout most of 2025, social issues were overseen by the Social Responsibility and Public Policy subcommittee of the Kellanova Board of Directors, which assisted the Board in its oversight responsibilities of social and public policy issues.

At the executive level, human rights issues were overseen by the Chief Sustainability Officer, who reported 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 and EiQ by LRQA, to assess forced labor 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 also are subject to audits upon request.
- We primarily use the SMETA (SEDEX) audit scheme, which includes on-site worker interviews based on the most recent methodology.
- 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).

Sugar Cane

Brazil
Colombia
Thailand
Mexico

Cocoa

Ghana
Cote d'Ivoire

Palm Oil

Malaysia
Indonesia

Hazelnuts

Türkiye

Raisins and Sultanas

Türkiye

Rice

Myanmar

Own Operations

39	9	23%
Total Owned Facilities	Number of facilities audited in 2025	Percentage of facilities audited in 2025

In 2025, Kellanova performed social compliance SMETA (SEDEX) and ERSA (LRQA) audits at nine 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 2025, no issues or indicators of forced labor, child labor or bonded labor were found.

Supply Chain Operations

GLOBAL IN-SCOPE SUPPLIERS	
77%	46%
With active Sedex Membership	With Valid Social Compliance Audits

As of December 2025, 77% of global in-scope suppliers registered with the Sedex platform. This aids Kellanova in more accurately tracking Tier 1 supply chain locations and assessing 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.

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 our website and toll-free phone numbers in almost 40 countries. The Ethics Line allows anonymous reporting, where permitted by law, and is operated by an independent third-party to provide employees, suppliers, contractors and the public with a platform to freely convey any issues.

An independent operator listens to concerns or inquiries and submits a confidential report with a written summary of the situation through the system to the Office of Ethics and Compliance for review, investigation and further action, as appropriate. Ethics Line toll-free numbers are included in the Global Code of Ethics and listed on Kellanova Speak Up posters located around our facilities in local languages.

Our Ethics Line receives hundreds of reports every year, which is expected for a company of our size. We view this as an important indicator of our strong Speak Up culture. All reports received through the Kellanova Ethics Line are reviewed by the Office of Ethics and Compliance and assigned further appropriate actions. We value input from employees that helps us improve our practices. Most cases pertain to Human Resources questions or Employment Relations matters, and all reports are investigated in accordance with our policies and protocols. When necessary, we escalate significant issues to our Leadership Team. To encourage employees to Speak Up, we maintain a Non-Retaliation Policy to protect anyone who raises a concern, reports misconduct or participates in an investigation. The Non-Retaliation Policy is enforced with strict discipline measures, up to and including termination.

All reports are monitored and subject to review by the Office of Ethics and Compliance and the Audit Committee of the Board of Directors. Most investigations can be completed quickly. Our goal is to complete investigations within 30-45 days. However, completion timelines may vary depending upon the complexity of the investigation. Lessons learned are leveraged to detect and prevent future misconduct, ensure compliance and identify opportunities for improvement.

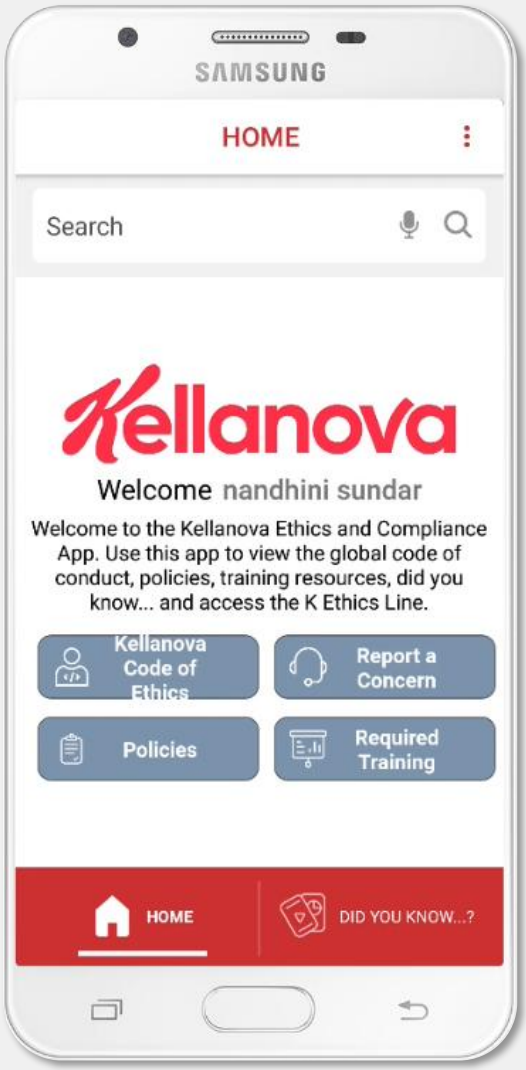
Another reporting mechanism available to our employees is the Kellanova Internal Employee Portal Information Center (EPIC). This portal provides employees with the ability to report and manage any people-related concerns or activities from 6 a.m. to 1 a.m. ET, Monday – Friday.

There were no reports of forced labor in 2025.

In addition to other methods of communicating concerns 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 all employees.

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



LRQA Supplier Assessment – 2019- 2025

Since 2019, Kellanova has partnered with LRQA on a comprehensive, data-driven responsible sourcing strategy that addresses salient rights risks within priority Tier 1 ingredient and packaging supply chains.

- From 2020-2021, we piloted the program that included Worker Voice and Critical Issues surveys, on-site social assessments and child labor self-assessment questionnaires with Tier 1 ingredient and packaging suppliers.
- In 2022, we introduced remediation and capacity building to help each site manage and further investigate risks, remediate identified issues, and implement effective preventive actions to mitigate future risk.
- In 2023, we advanced the program, from "priority" sites to "moderate" sites. A project plan template was created to address findings at each site, capacity building calls were held and follow-up e-learnings offered.
- For 2024, we focused more intently on understanding the engagement practices raised in the Worker Voice and Critical Issues Surveys. Overall, we heard from 3,962 workers at 13 Tier 1 and Tier suppliers in six countries.

In 2025, 12 suppliers in 11 countries engaged with Kellanova to identify risks through worker voice engagement, using Critical Issues and Labor Risk surveys. As in previous years, site remediation, capacity building and e-learning helped suppliers understand and act upon findings. Overall:

- 900 supplier employees (a 57% response rate) completed the surveys, representing 62% men, 31% women and 7% unspecified.
- The average score for all Critical Issues survey sites was 4.57/10.
- Of 164 total findings, there was a substantial decrease in "major" findings across all sites. There were 68 fewer medium and major findings and 43 more minimal findings.
- No medium or major findings were identified for business ethics.
- Most medium and major findings were in the Wages & Benefits and Harassment categories.
- All sites have either implemented corrective action plans based on survey findings or are in the process of closing findings.

CASE STUDIES

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. Here we provide 2025 case studies from Kellanova's Origins™ programs, 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.

Sultanas in Türkiye

Fair Labor Association – 2020- 2025

In 2020, Kellanova joined the Fair Labor Association's (FLA) partnership with other multi-national food and beverage companies, Türkiye-based suppliers and the Turkish Ministries of Labor and Social Security and Family and Social Policy to improve recruitment and employment practices among seasonal migrant agricultural workers. Now in its third phase, the Harvesting the Future (HTF) project focuses on four priority areas:

- Mandatory human rights due diligence and farm-level monitoring.
- Child protection and child labor remediation.
- Grievance mechanisms.
- Application of living wage standards.

Sultana suppliers operating in Türkiye have been one of the earliest supporters of the project that aims to develop 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.

In 2025, Kellanova focused its engagement on enhancing the capacity of three suppliers by providing one-on-one field support during the harvest season. This farm-level monitoring uncovered best practices that can be shared across suppliers and the entire growing ecosystem. For example, no cases of child labor were found at two suppliers and the one that had seven cases proactively conducted interviews with families and referred them to local training and social service institutions.

Across all suppliers, training on child labor, contract work, wage transparency, occupational health and safety and grievance mechanisms has increased steadily. For example:

- One supplier significantly improved its grievance mechanisms by sharing information in three common languages used by workers and launching WhatsApp line and telephone information lines. As other suppliers become aware of these practices, it's anticipated that they will follow suit.
- Suppliers are finding success by not only addressing the above risks during the harvest season but in pre-harvest preparation and post-harvest analyses.

Several challenges also were identified with remediation recommendations shared among the suppliers:

- Women's continued domestic responsibilities, in addition to their field work, create a double workload and cause them to remain in the background in the decision-making process. Sharing their experiences in peer-learning will contribute to accelerating the process of remediation in agriculture.
- The lack of hygiene and infrastructure presents worker health and safety challenges. The lack of mobile toilets and showers, difficulties in accessing clean drinking water, and overcrowded accommodation areas reduce workers' quality of life and increase health risks, especially for women and children. One supplier provided 180 first aid kits and 240 hygiene kits to field workers, a best practice to be shared.

FLA and its partners are seeing progress toward the HTF goals of:

- Improved capacity of participants to tackle issues related to responsible recruitment that seasonal migrant workers face in the agriculture sector.
- Increased adherence to national and international norms.
- Increased coordination and implementation of responsible recruitment principles in companies' supply chains.

AIM-Progress

Kellanova continues to work with AIM Progress to advance our Human Rights Due Diligence Supply Chain efforts, including supporting the creation of a remediation framework to address the concerning increase in cases of child-labor violations and human trafficking in the U.S. This work focuses on third-party labor providers in high-risk industries like manufacturing and food processing. Over time, the framework will help AIM-Progress members and their suppliers bring together businesses, schools, community organizations, government entities and other stakeholders to uphold human rights by addressing these issues.

Enveritas/MESAD

Kellanova continued to support 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. As part of its School for All initiative, the NGO built two more schools to serve 600 children annually, including 210 from cocoa plantations. Nearly 600 cocoa farmers were trained on modern agricultural practices. Additionally, 340 women received training on family budgeting, the creation of village savings and loan associations, management of school canteens, income-generating activities and literacy.

Wild Asia

In 2025, Kellanova completed its collaboration with the Wild Asia SPIRAL (Small Producer Inclusivity and Resilience Alliance) initiative to create more inclusive and biodiverse palm oil. Although we are now procuring 100% physically certified palm oil, the following impacts can be directly attributed to Kellanova's funding contributions during our engagement, according to SPIRAL:

- Participation: 383 members supported; 43 farmers trained; 20 bio farmers supported
- Inclusion: 123 women farmers engaged and 87 certified; 198 native farmers engaged and 145 certified
- Capacity: 2 trainings conducted; 7% adopted regenerative agriculture practices
- Livelihoods: 286 certified producers; 278 farmers receiving a premium for their regenerative crops of USD $3 - $4 /metric ton of fresh fruit bunches.

ASACAM

With the Alianze por la Sustentabilidad de la Agroindustria de la Cana de Azucar en Mexico (ASACAM), Kellanova developed a Responsible Recruitment Toolkit to improve labor practices and align stakeholders around ethical recruitment standards as part of the comprehensive effort to advance sustainability in Mexico's sugarcane industry led by the National Committee for the Sustainable Development of Sugar care (CONADESUCA). Since introducing the pilot toolkit, workers report improved transparency in job conditions, but challenges remain, including limited understanding of wages and how to access protective equipment, and lack of pay slips. An Ethics Subcommittee has been established to address concerns and strengthen accountability.

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

Global Human Rights Policy
Policy Statement Prohibiting Involuntary Labor
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.

External memberships

- 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)
- Mexico Sugarcane Collective Action - Bonsucro
- North American Sustainable Palm Oil Network
- Palm Oil Transparency Coalition
- Roundtable on Sustainable Palm Oil (RSPO)
- SEDEX
- United Nations Global Compact (UNGC)