

General Mills' Statement Against Modern Slavery and Human Trafficking – Fiscal 2020

Signed January 25, 2021

Board Approved January 26, 2021

About this Statement

This is a statement of the steps General Mills has taken in an effort to ensure slavery and human trafficking are not taking place in our supply chain or business and covers General Mills' Fiscal 2020, the period of 12 months ending on May 31, 2020. The following document serves as a statement complying with [The Australian Modern Slavery Act 2018](#), [The UK Modern Slavery Act 2015](#), and the [California Transparency in Supply Chains Act](#).

The process of preparing this statement involved the participation of a wide range of internal stakeholders across many functions of General Mills. For the purposes of the Australian Modern Slavery Act, this is a joint statement for the reporting entity, General Mills Holding (Australia) Pty Ltd, and the entity submitting the statement, General Mills, Inc.

Table of Contents

Our Company, Structure, and Supply Chain	1
Our Approach to Human Rights	2
Governance	3
Commitments, Policies, and Training	3
Stakeholder Engagement and Collaboration	4
Risk Assessment	4
Human Rights Due Diligence in our Own Operations	5
Human Rights Due Diligence in our Supply Chain.....	5
Looking Ahead	9

Our Company, Structure, and Supply Chain

General Mills is a leading publicly traded, global manufacturer and marketer of branded consumer foods and wholesome natural pet food sold through retail stores. We are also a leading supplier to the North American foodservice and commercial baking industries. In addition to our consolidated operations, we have 50% interests in two strategic joint ventures that manufacture and market food products sold in more than 130 countries worldwide: our Cereal Partners Worldwide joint venture with Nestlé S.A. competes in the ready-to-eat cereal category in markets outside North America, and our Häagen-Dazs Japan, Inc. joint venture competes in the super-premium ice cream category in Japan. General Mills generated fiscal 2020 net sales of U.S. \$17.6 billion, and General Mills' share of non-consolidated joint-venture net sales totaled U.S. \$1.0 billion. As of May 31, 2020, we had approximately 35,000 full- and part-time employees.

Headquartered in Minneapolis, Minnesota, USA, General Mills owns our principal executive offices and main research facilities. We operate numerous manufacturing facilities and maintain many sales and administrative offices, warehouses, and distribution centers around the world. We manufacture our products in 13 countries and market



them in more than 100 countries. As of May 31, 2020, we operated 47 food production facilities. Of these facilities, 24 are located in the United States, 4 in the Greater China region, 1 in the Asia/Middle East/Africa Region, 2 in Canada, 8 in Europe/Australia, and 8 in Latin America and Mexico. We also operate numerous grain elevators in the United States. We utilize approximately 15 million square feet of warehouse and distribution space that primarily supports our North America Retail segment. As part of our Häagen-Dazs business in our Europe & Australia and Asia & Latin America segments, we operate 500 (all leased) and franchise 358 branded ice cream parlors in various countries around the world.

Our Supply Chain

We work within a large, diverse value chain of business partners and stakeholders. Our supplier base is large, complex, and global, with thousands of suppliers in more than 25 countries. The principal raw materials we use are grains (wheat, oats, and corn), dairy products, sugar, fruits, vegetable oils, meats, nuts, vegetables, and other agricultural products. We also use substantial quantities of carton board, corrugated cardboard, plastic, and metal packaging materials, operating supplies, and energy. Most of these inputs for our domestic and Canadian operations are purchased from suppliers in the United States. In our other international operations, inputs that are not locally available in adequate supply may be imported from other countries.

Australia

In Australia, General Mills brands include, Old El Paso™, Latina™ Fresh, Betty Crocker™, Nature Valley™, Häagen-Dazs™ Fibre One™, and Pecks™. As of May 31, 2020, we employed 212 people across our headquarters in Melbourne and at our manufacturing site in Rooty Hill, NSW. Our primary manufacturing sites relevant to our products imported for sale and made and sold in Australia are located in Australia, Spain, Portugal, France, and Greece. Additionally, we partner with third party manufacturing and distribution centers in Australia, New Zealand, and France.

General Mills Holding (Australia) Pty Ltd is the reporting entity for the purposes of the Australian Modern Slavery Act. This statement also covers its wholly-owned subsidiaries General Mills Manufacturing Australia Pty Ltd and General Mills Australia Pty Ltd.

United Kingdom

In the United Kingdom, General Mills brands include Green Giant™, Häagen-Dazs™, Old El Paso™, Yoplait™, Nature Valley™, Fibre One™, Betty Crocker™, Jus-Rol™, Lärabar™, and Pillsbury™. We employ approximately 280 people in the UK, all of whom are based in our London offices. Our primary manufacturing sites relevant to our products imported for sale in the UK are located in France, Spain, Greece, the U.S., and India. Additionally, we partner with third party manufacturing and distribution centers in the UK, France, Spain, Portugal, Holland, Mexico, Peru, and Ecuador.

Our Approach to Human Rights

General Mills is committed to respecting human rights and strives to positively impact all the people we depend upon across our full value chain. To better understand our human rights risks and guide our work, we are following a strategic framework (see below) to strengthen our ability to assess, address, and prevent potential impacts across our value chain and are taking a thoughtful approach in each step of our journey. We aim to know and show our human rights risks and take them into account in business decisions. We are focused on developing human rights due diligence capabilities to proactively identify where the risks for potential impacts on people in our value chain are most severe, prioritize actions, track progress, and communicate. Our strategy is modeled on the [United Nations Guiding Principles for Business and Human Rights](#).





Governance

The **General Mills leadership team** has ultimate accountability for the company's global responsibility programs and performance. The Board has made it a priority to ensure sustainability and global responsibility are taken seriously at all levels of the company. The **Board of Directors' Public Responsibility Committee** provides oversight and receives regular updates from the operating teams. Our Chairman and CEO convenes the [Sustainability Governance Committee](#), which consists of officers of the company, three times per year to monitor and approve strategies, policies, and key investments related to sustainability and social responsibility initiatives.

At General Mills, we have resources appointed to enhance our human rights strategy. The role of **Director of Human Rights** has accountability for advancing respect for human rights across our value chain and reports to the Chief Sustainability and Social Impact Officer. The Director of Human Rights also oversees the **Human Rights Integration Team**, a global, cross-functional team advancing General Mills' work on human rights. The Global Responsible Sourcing program has a dedicated team and is part of our Global Supply Chain Risk Center of Excellence (COE). This COE was established to drive holistic risk routines, standardize processes, and business integration to incorporate risk data into decision making across General Mills.

Commitments, Policies, and Training

Respect for human rights is fundamental to our purpose of making food the world loves and to our commitment to ethical business conduct.

We respect and acknowledge internationally recognized human rights principles. We are working diligently to implement the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#) throughout our business. We have been a signatory to the [United Nations Global Compact \(UNGC\)](#) since 2008 and are guided by the UNGC's 10 principles regarding human rights, labor, the environment, and anti-corruption. We are also a signatory to the [United Nations Women's Empowerment Principles](#). We recognize governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions.

Our [Human Rights Policy](#) states the standards for our company, suppliers, and partners regarding the protection of human rights. These standards are based in part on the [International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work](#).

Consistent with the principles outlined in our [Employee Code of Conduct](#) and [Supplier Code of Conduct](#), we:

- Prohibit forced labor, child labor, and discrimination
- Work to establish safe and healthy working conditions
- Value diversity and consider it core to our business strategy
- Seek to compensate employees competitively and operate in compliance with applicable wage, work hours, overtime, and benefits laws
- Respect the principles of freedom of association and collective bargaining
- Recognize the importance of land rights as well as the principle of free, prior, and informed consent (FPIC), as outlined in our [Palm Oil Statement](#), and support implementation of FPIC by national authorities.

Employee Code of Conduct

Our Employee Code of Conduct outlines our ethical expectations and provides practical tips and examples for how to act with integrity in every decision, every action, every day.

Training and Communication

We communicate our expectations through training opportunities and educational modules on our company intranet. Employees participate in live and online scenario-based training to illustrate ethical decision-making in daily business activities. Posters highlighting key messages from our Code of Conduct are posted in manufacturing facilities and offices. The code and posters are available in 13 languages for our global workforce. Employees also have access to an intranet site dedicated to Ethics & Compliance information and resources.



Supplier Code of Conduct

The standards we hold for our suppliers are laid out in our [Supplier Code of Conduct](#), which covers four pillars of responsible sourcing: human rights, health and safety, the environment, and business integrity.

In fiscal 2020, we made the following enhancements:

- Suppliers must accept our Supplier Code of Conduct to participate in bidding events
- The Supplier Code of Conduct is integrated into standard ingredient and packaging contracts

Training and Communication

To ensure alignment across the function, all sourcing employees complete online learning on our [Supplier Code of Conduct](#). This training covers the four pillars of our Responsible Sourcing program: human rights, environment, health and safety, and business integrity. The human rights section of the training includes education on modern slavery, forced labor, and child labor, as well as descriptions of other human rights. In fiscal 2020, our employee training on the Supplier Code of Conduct was translated into five additional languages.

Stakeholder Engagement and Collaboration

We recognize that we are part of a broader community wherever we operate and believe engaging stakeholders is fundamental to our respect for human rights. We are committed to engaging with relevant parties in an effort to understand, assess, and address areas of concern. We are also committed to collaborating with our suppliers and our business partners to eradicate modern slavery. We have engaged with the following groups on human rights issues:

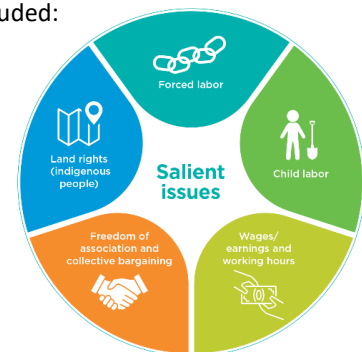
- [AIM-PROGRESS](#), a forum of consumer goods manufacturers focused on responsible sourcing
- The [World Cocoa Foundation’s Cocoa & Forests Initiative](#) (See the cocoa section below)
- [CARE International](#) (See the cocoa section below)
- [Proforest](#) (See the Palm Oil section below)
- [Shift](#) (see the Risk Assessment and Salient Issues section below)

Risk Assessment

In 2020, General Mills partnered with Shift, the leading center of expertise on the UN Guiding Principles on Business and Human Rights, to assess our salient human rights risks. We conducted an initial assessment of human rights-related issues inherent to a complex supply chain like General Mills to identify and prioritize future due diligence on the most salient human rights risks to people throughout our value chain.

This initial assessment was conducted in line with the UN Guiding Principles and included:

- Desktop research including a review of all relevant internal policies and programs underway
- Internal stakeholder interviews with individuals from across the company
- External stakeholder interviews of leaders from non-profit organizations
- Workshops with internal stakeholders to review research findings and prioritize the list of salient issues
- Peer benchmarking



This assessment identified forced labor and child labor as the most salient issues associated with our value chain. We also identified wages, earnings, and working hours; freedom of association and collective bargaining; and land rights as important salient issues. A variety of factors may increase human rights risks, including temporary or seasonal work status and weak enforcement of legal protections. As we work on advancing respect for all human rights, we are prioritizing efforts that can reach the most vulnerable people, focusing first on assessing and addressing forced labor and child labor.



Human Rights Due Diligence in our Own Operations

The risk of modern slavery in our owned operations is low due to policies and practices aligned with our corporate value of putting people first, strong auditing programs, interviews with third-party labor vendors for manufacturing plants, and accountability for remediation of any findings.

Grievance – The Ethics Line

Our [Ethics Line](#), hosted by an independent reporting service, is available 24 hours a day, 7 days a week, from any location worldwide and is multi-lingual. Those using the line can choose to remain anonymous. The Ethics Line is available on our Corporate Website and can be used by anyone wishing to raise a concern or question. Ethics Line cases are routed to Ethics & Compliance to triage for initial review, who then align an investigation team (HR, Global Security, Global Internal Audit, Finance or Law) depending on the report.

While the Ethics Line is open to all General Mills stakeholders to report concerns about any part of our value chain, it is primarily used for employees to report concerns of Employee Code of Conduct violations. Along with robust, standardized operations and human resources policies, training, and oversight, the Ethics Line helps us feel confident that the risk of modern slavery in our owned operations is low.

General Mills encourages all leaders to foster an environment of productive discourse where employees feel comfortable raising concerns. Employees are encouraged to raise concerns with their manager, and they are also reminded that their HR business representative, a lawyer at General Mills, a member of the Ethics & Compliance group, and the Ethics Line are all available for receiving concerns.

Assessing the Effectiveness of the Ethics Line

Semi-annually, Ethics & Compliance presents to the Audit Committee of the Board of Directors on the Ethics & Compliance program, including a report of employee incidents. The report includes details of the incident, results of the investigation, and outcome. Our external auditor, KPMG receives a similar report quarterly and reviews it with Ethics & Compliance. In fiscal 2020, there were no reports or questions related to modern slavery.

Each year, the company conducts an annual **Ethical Culture Survey**, which gathers employees' perceptions of our ethical culture and Ethics & Compliance resources. The Ethical Culture Survey goes to a randomly selected group representing 25% of office employees and 10% of production employees worldwide. Our survey results indicate that employees feel comfortable raising concerns without fear of negative consequences, and they are confident that if they report an inappropriate business practice or ethical issue something will be done about it.

Another area we measure is employees' comfort in speaking up. We reference the [NAVEX Global Risk and Compliance Benchmark Report](#), according to which, a low percentage of anonymous reports indicates comfort in the reporting process. Our Ethics Line receives an anonymous reporting rate significantly lower than the industry average, which, combined with the scores related to comfort in reporting we see in our Ethical Culture Survey, provides a reasonable indicator that our employees feel safe in raising complaints and concerns.

Human Rights Due Diligence in our Supply Chain

Responsible Sourcing Audits

The Global Responsible Sourcing program manages compliance of our owned manufacturing locations, co-packers, premiums and licensing, and Tier 1 direct suppliers. We expect all suppliers to uphold our Supplier Code of Conduct, and we use responsible sourcing audits to assess and understand suppliers' business practices.

We use the 4-pillar [Sedex Members Ethical Trade Audit \(SMETA\) protocol](#) or mutually recognized audits to assess our supply chain on social and environmental practices. SMETA is a prescriptive audit procedure covering Health and Safety, Labor Standards (including audit criteria on forced labor and human trafficking), Environment, and Business Ethics. The audit covers human rights by assessing the extent to which businesses understand and manage their human rights impacts through the lens of the UNGPs. The SMETA framework is widely recognized by companies across many sectors, which enables suppliers to share audit results with multiple customers to improve efficiency and reduce



audit burden. Due to the challenges of COVID-19, General Mills is accepting virtual SMETA audits in regions where physical audits are not permitted.

Our **owned manufacturing locations** are audited to a General Mills protocol equivalent to SMETA at minimum every three years, and we require our **co-packers** to submit an updated audit every three years. During fiscal 2020, 45 of our owned locations and co-packers were audited, representing about 21% of the total, compared to 54 locations the prior year.

Tier 1 direct suppliers (suppliers that provide ingredients used in our food products or packaging) are rated by inherent country and goods risk using external data sources. To segment our Tier 1 suppliers into different risk levels, we consider factors including geography, ingredient category, and the results of prior responsible sourcing audits from around the world, covering health and safety, human rights, business integrity, and the environment.

From fiscal 2018 to fiscal 2020, inherently high-risk Tier 1 direct suppliers were asked to complete a self-assessment questionnaire followed by an audit for the highest risk suppliers. Beginning in June 2020, we simplified our program by eliminating the self-assessment questionnaire and only require a SMETA complaint audit to decrease supplier time and resource requirements and improve the effectiveness of the program. All suppliers will be expected to comply and participate in the program by submitting a SMETA-compliant audit when requested.

Responsible Sourcing Audit Overview: Fiscal 2018 – Fiscal 2020*

	Fiscal 2018	Fiscal 2019	Fiscal 2020
Owned manufacturing locations			
Number of sites audited	20	19	23
Locations with noncompliances**	12	9	16
% of noncompliances resolved as of December 2020	94%	89%	65%
Co-packers			
Number of sites audited	47	35	22
Locations with noncompliances***	31	17	14
% of non-compliances resolved as of December 2020	68%	98%	53%
Tier 1 direct suppliers			
Number of sites audited	38	11	1
Locations with noncompliances****	24	6	1
% of non-compliances resolved as of December 2020	60%	55%	0%

*For fiscal 2018 and 2019, some data differ compared to prior reports due to changes in methodology (% of noncompliances resolved are reported based on the number of findings rather than the number of suppliers with findings) as well as improvements in data collection and accuracy.

**Of noncompliances identified for owned manufacturing locations in fiscal 2020, 36% related to human rights and 64% related to health, safety, and environment.

***Of noncompliances identified for co-packers in fiscal 2020, 30% related to human rights and 70% to health, safety, and environment.

****Of noncompliances identified for Tier 1 direct suppliers in Fiscal 2020, 100% related to health, safety, and environment.

Remediation

Responsible sourcing audit findings and ethics line cases are addressed according to the processes specified above. We are working to build consistent processes for the remediation of human rights violations, which will be informed by the UNGP framework of “cause, contribute to, and directly linked to”.



High-Risk Ingredient Sourcing

Some raw materials have a higher likelihood of modern slavery risks due to conditions in the countries in which they are grown and/or the typical practices associated with their production. General Mills is conscious of this – especially concerning cocoa, vanilla, palm oil, seafood, and sugarcane – and has a range of measures in place to address those risks. These approaches are described in the following section.

Cocoa

We work with key suppliers to provide direct support to cocoa-growing communities in West Africa, addressing systemic challenges and enforcing our Supplier Code of Conduct, which prohibits forced and child labor.

In addition to supplier programs, the General Mills Foundation and [CARE International](#) launched the Cocoa Sustainability Initiative (CSI) in 2014 to improve smallholder cocoa farmers' livelihoods and well-being in Ghana and Côte d'Ivoire. The program addresses low agricultural incomes and productivity through Good Agricultural Practices (GAP) Training, improved access to inputs, and strengthening of agricultural cooperatives. Activities including Village Savings and Loans Associations (VSLAs), Women's Groups, and Community Development Committees aim to increase agency, resiliency, and self-efficacy of communities and individual beneficiaries. In Côte d'Ivoire, program activities include initiatives that create community awareness around child labor for mitigation and prevention, through educating parents about the risks of child labor, the importance of children under 15 returning to school, and the provision of birth certificates.

We are a member of the [World Cocoa Foundation \(WCF\)](#), which works with the food industry to address social and environmental issues in the cocoa supply chain. Since signing on to [WCF's Cocoa & Forests Initiative](#) in March 2017, we have worked closely with suppliers, NGOs, and [Proforest](#) to identify strategic actions to protect and restore forests, increase sustainable production, and promote social and community engagement. In early 2019, we published action plans for [Côte d'Ivoire](#) and [Ghana](#) through 2022.

In Côte d'Ivoire, we partner with cocoa suppliers Barry Callebaut and Cargill to help smallholder farmers. In combination with funding from other companies, our support of the [Cargill Cocoa Promise](#) program with the humanitarian organization [CARE](#) has benefited 10 communities. Our support of Barry Callebaut's [Cocoa Horizons](#) program helps farmers in 65 cocoa cooperatives improve productivity through training, support, and financing. In Ghana, we are working with Cargill and CARE in 20 communities to form village cooperatives and provide technical assistance and educational support to more than 2,300 smallholder farmers.

As we assess the effectiveness of our approach, we learned from a recent third-party evaluation of our partnership with CARE under the Cocoa Sustainability Initiative, that child labor awareness programs are most effective when coupled with initiatives to address the financial and institutional barriers to schooling. For example, cooperative and community leaders indicated that the continued economic empowerment of women is key to reducing child labor, as women are more likely to invest their money in children's education and wellbeing. These steps are often more effective than conducting sensitization training alone, which is often a focus of community development activities.

Palm Oil

The palm oil supply chain can have significant impacts on workers, communities, and the environment. We are dedicated to sourcing palm oil in a socially and environmentally responsible manner to help move the industry forward. We partner with Proforest, a non-profit focused on sustainable and responsible sourcing, to advance our strategy, which has four key components: certification, supplier engagement, supply chain traceability, and grievance management.

Certification

Since fiscal 2015, all of our palm oil has been sourced through purchases meeting [Roundtable on Sustainable Palm Oil \(RSPO\)](#) standards. We have continued to shift from certificates to mass balance and segregated palm oil, which accounted for over 98% of our purchases in Fiscal 2020. In cases where certificates are needed, we use the industry standard of [PalmTrace](#).



Supplier Engagement

Proforest provides Tier 1 supplier scorecards and updates the list of supplier mills twice per year. Proforest also monitors the mills in our supply chain to investigate grievances and recommendations for Tier 1 supplier follow up. We are partnering to identify landscape-level intervention in Indonesia, in which we will embed human rights related outcomes.

General Mills is collaborating with Musim Mas Group to launch a program designed to integrate independent smallholders from villages neighboring the Leuser Ecosystem in Aceh Singkil, Sumatra, Indonesia, into the sustainable palm oil supply chain to reduce deforestation by improving livelihoods. We recognize the opportunity for industry investment at origin in partnership with key upstream suppliers to support smallholders in addressing environmental, social, and economic challenges, and we are now putting this into practice in the Aceh Singkil region. We are pleased to partner with Musim Mas to invest in a smallholder hub program focused on improving the economic security of smallholders and assisting smallholders on their journey towards sustainable production, through collaboration with local government. Investment from General Mills will support the hiring of village extension officers who will provide good agricultural practice, financial literacy, and NDPE (No Deforestation, No Peat, No Exploitation) training and resources to smallholders. The first year of the program will aim to train 20 village and extension officers who will provide support to over 500 smallholders in high-priority villages.

Supply Chain Traceability

In 2020, we continued working with [Proforest](#) to trace our palm oil supply chain, identify risks, and ensure responsible sourcing. At the end of 2019, 99% of our palm oil volume was categorized as traceable to the extraction mill. We are driving toward increased public transparency regarding upstream supply and expect all of our palm oil suppliers to follow a similar practice. General Mills asks our direct suppliers to commit to the publication of concession maps for all the mills from which they purchase and to similarly demand that all upstream suppliers make group level concession maps a requirement of trade.

Palm-Specific Grievance Management

In 2018, we received an increasing number of producer related grievances with alleged cases of non-compliance against our policy. To ensure the effective handling of these cases, we introduced our [Palm Oil Grievance Tracker](#), an internal grievance management system. We have quarterly meetings with Proforest to discuss and monitor grievance reports and ensure compliance. In cases where there is verified non-compliance with our policy, or where there is continued failure to remediate noncompliance promptly, we take steps to remove those producers from our supply chain.

Read more about our Statement on Palm Oil here: <https://www.generalmills.com/en/News/Issues/palm-oil-statement>

Sugarcane

Our goals in responsible sourcing of sugarcane are to address the following:

- Labor rights, including child and forced labor, and working conditions related to worker health, safety, and hours
- Improving visibility to the origin of purchased sugarcane
- Addressing water quality issues related to agriculture

We leverage our [Bonsucro](#) membership and the organization's [Production Standard](#), plus related credits to help farmers and mills in our supply chain measure increased productivity while reducing key environmental and social impacts.

Vanilla

Economic viability, the ability of smallholder farmers to earn enough from the crop to support their families, is a challenge in vanilla farming. We work with our key supplier and NGO partners to advance sustainable vanilla in the Sava region of Madagascar. We've collaborated with [Virginia Dare](#) to support smallholder farmer co-op development in key sourcing communities and fund [Positive Planet](#) to administer capacity-building Village Savings and Loan Associations. We have also invested in and supported the [Sustainable Vanilla Initiative](#) as a platform for leveraging broader industry collaboration.



Assessing Effectiveness

Human rights abuses are complex issues requiring comprehensive approaches. This past year, we assessed the effectiveness of our existing approach to human rights by conducting an internal review and partnering with Shift to assess our strengths and opportunities. We then developed our updated strategy on human rights to address the identified challenges. We also formed our cross-functional Human Rights Integration Team, which meets bi-weekly to discuss progress and challenges to implement our plans, in addition to external events, which might require additional actions. As we work to address human rights risks, we will partner with local NGOs and stakeholders to assess effectiveness.

Looking Ahead

Our journey to advance human rights is one of continuous improvement. As we grow our capacity and develop our program, we plan to expand our disclosures in line with the UNGP reporting framework. Our focus in the coming year includes:

- Building due diligence capabilities to proactively identify risks where impacts on people are most severe across our value chain
- Integrating human rights considerations into environmental strategies
- Increasing employee awareness of our enhanced human rights strategy
- Integrating expectations into standard business processes

Hereby signed,

Jeff Harmening

Chairman of the Board and CEO, General Mills, Inc.