

Protecting, respecting and advancing human rights:

Kellanova 2025 Global Human Rights Milestones

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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

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.

2025 Global Human Rights Milestones

APPROACH

Own Operations

39

Total Owned Facilities

9

Number of facilities
audited in 2025

23%

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%

With active Sedex Membership

46%

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.

2025 Global Human Rights Milestones

APPROACH

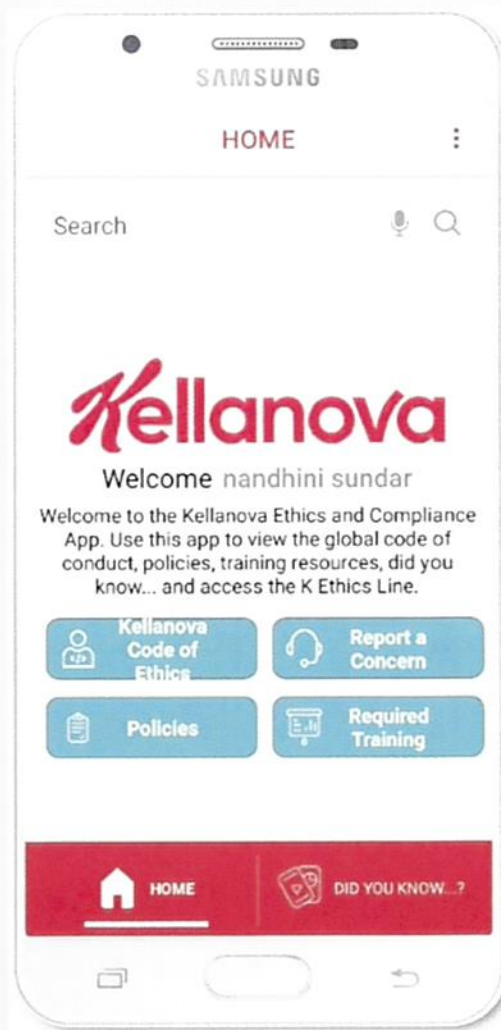
Another reporting mechanism available to our employees is the Kellanova Internal Employee Portal Information Center (EPIC). This portal provides employees with the ability to report and manage any people-related concerns or activities from 6 a.m. to 1 a.m. ET, Monday – Friday.

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.





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.

2025 Global Human Rights Milestones

CASE STUDIES

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.

ASACAM

With the Alianza 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 cane (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.

2025

Global Human Rights Milestones

Approved by Directors July 2026

Kellogg Marketing and Sales Company (UK) Limited



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