

# Slavery and human trafficking statement

Addressing the California Supply Chains Act and the United Kingdom Modern Slavery Act

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We at General Mills believe that societies, economies and businesses thrive when human rights are protected and respected.

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

This is a statement of the steps General Mills has taken, including those taken during the financial year, in an effort to ensure that slavery and human trafficking are not taking place in any of our supply chain and any part of our business.

#### **Our Business**

General Mills respects and acknowledges internationally recognized human rights principles. Within our company and throughout our supply chain, we are committed to treating people with dignity and

respect.

We work within a large, diverse value chain of business partners and stakeholders. We recognize that each entity in this chain has its own independent duty to respect human rights. We expect our business partners and stakeholders to adhere to ethical business conduct consistent with our own, and are committed to working with them to fulfill this common goal.

#### **Our Policies**

Consistent with the principles set forth in our <u>Employee Code of Conduct</u> and <u>Supplier Code of Conduct</u>, we prohibit forced labor, child labor, and discrimination.

Our Workplace Standards and Ethical Sourcing Policy along with our codes of conduct and our <u>Human Rights policy</u> set 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.

#### **Responsible Sourcing Program**

The protection of human rights is one of the four pillars of our responsible sourcing program, which also encompasses health and safety, environmental compliance and business integrity in our supply chain.

Responsible sourcing is defined in our Supplier Code of Conduct. We also use a <u>performance</u> <u>dashboard</u> to track progress towards 100 percent sustainable sourcing of our priority ingredients by 2020; there you can find information on which ingredient supply chains are at risk for slavery and human trafficking.

#### Verification

We engage in verification activities to identify, assess and manage the risk of slavery and human trafficking in our supply chain. In 2013, we worked with a third party consultancy to complete a risk assessment of all global raw material suppliers against criteria such as spend, type of ingredient or material and location to determine our highest risk categories and supplier locations. Using our risk assessment and its multiple criteria, we prioritized the audits of those suppliers most at-risk for responsible sourcing challenges.

#### **Audits**

We use third party auditors to conduct independent audits across General Mills-owned facilities, copackers, and suppliers to evaluate compliance with company standards for slavery and human trafficking, health and safety, environment, and business integrity in our supply chain. We do not typically conduct unannounced visits.

Occasionally a co-packer or supplier has already been audited for another company; we evaluate those audits on a case by case basis. If the audit is comparable to our own and was undertaken within the past year, we may accept it in lieu of requiring a new audit. We work with <u>AIM-Progress</u>, a responsible sourcing forum for consumer goods manufacturers and suppliers around the world.

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have since expanded the scope of verification and audits to include suppliers. In 2014, we completed 68 audits of our finished goods facilities. We will meet our ongoing goal of auditing top risk suppliers a minimum of once every three years, and more often in the case of major or critical findings.

#### Certification

The standards we hold for our suppliers are laid out in our <u>Supplier Code of Conduct</u>. We expect our business partners, internal and external, to share our commitment to the rule of law and to compliance with the law wherever we operate. Our Supplier Code of Conduct obligates suppliers to comply with all applicable laws - including those related to slavery and human trafficking - in every market in which we do business with them. Suppliers certify compliance by accepting our code of conduct in the terms and conditions of each purchase order.

#### **Accountability and Results**

As of March 2016, we have audited over 250 locations across facilities owned by General Mills and finished goods co-packers. We report on our progress annually in our <u>Global Responsibility Report</u>.

Our facilities, co-packers and suppliers are held accountable for the results of our responsible sourcing audits by our responsible sourcing managers, contract managers and our third-party audit partners. Our policy is to address all instances of noncompliance with company standards regarding slavery and human trafficking found during audits in an agreed-upon corrective action plan with a target timeline of 30 to 90 days. We request supporting documentation of the actions taken.

Critical findings result in a re-audit of the facility within one year; a major rating results in a full audit within 2 years. If the facility fails to make progress against the corrective action plan, they are subject to review and sanctions, including potential termination. We have terminated relationships with suppliers for issues such as unresponsiveness or repeated audit findings.

We make resources available to facilitate reporting and protect workers who lodge grievances or report violations. For example, we have an Ethics Line available to employees, contractors and the public at 1-800-210-2878 or <a href="www.generalmillsethics.ethicspoint.com">www.generalmillsethics.ethicspoint.com</a>. For locations outside of the U.S., toll-free dialing instructions are available at the link above. Where allowed by law, the Ethics Line allows anonymity. We have policies in place to prevent reprisal or retaliatory action against anyone for raising legitimate concerns. We are committed to investigating and responding to such concerns in a prompt and responsible manner.

#### **Training**

Training is an important part of effective human rights practices. We therefore undertake efforts to build awareness about our human rights policies and procedures. In 2015, employees and managers who have direct responsibility for supply chain management completed a required training module on the <a href="Supplier Code of Conduct">Supplier Code of Conduct</a>, with content specific to recognizing possible signs of slavery and human trafficking and mitigating risks within the supply chain of products. We do not require our suppliers to complete similar training.

#### Want to Know More?

Read more about our policies and actions to treat the world with care in our Global Responsibility Report.

Hereby signed,

General Mills Chairman of the Board and CEO

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Phone: 1-800-248-7310 Fax: 1-763-764-8330

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