MODERN SLAVERY
STATEMENT 2018

The Kraft Heinz Company and its direct and indirect subsidiaries including H.J. Heinz Company Limited, H.J. Heinz Foods UK Limited and H.J. Heinz Manufacturing UK Limited (collectively “Kraft Heinz”) has continued its progress on its objective of Growing a Better World by enhancing the quality of people’s lives through sustainability, health and wellness and social responsibility. We believe the protection of human rights is fundamental to good business, and believe that we have both the ability and the responsibility to drive positive change through our global work.

In support of this vision we are committed to respecting human rights in our own operations and throughout our global value chain. Kraft Heinz continues to place a high value on an ethical and transparent supply chain, and supports initiatives aimed to eradicate slavery and human trafficking. Kraft Heinz demands all business partners demonstrate a clear commitment to protecting the rights of workers worldwide, and does not tolerate the use of forced labour—including human trafficking and slavery.

Kraft Heinz continues to partner with thousands of suppliers globally that are all committed to ensuring that there is no modern slavery within the Kraft Heinz supply chain. From standard contractual clauses requiring compliance to the completion of audits and due diligence processes, Kraft Heinz is always evaluating the suppliers it uses and its own operations to ensure that they are operating with integrity, one of the company’s core principles.

Supply Chains

Our supply chains are primarily focused on the sourcing, warehousing and transporting of the raw materials, ingredients and packaging required for the manufacture of our food and beverage products globally. All business partners, including but not limited to suppliers of raw materials, ingredients and packaging, are required to demonstrate a clear commitment to protecting the rights of workers worldwide. Specifically, suppliers are required to adhere to our Supplier Guiding Principles. Upon request, a supplier must certify its compliance with all such principles.

Policies on Slavery and Anti-Trafficking

Internal Accountability

Kraft Heinz is committed to ensuring that there is no slavery or human trafficking in any part of our business, including our supply chain. Each Kraft Heinz employee is expected to conduct business legally and ethically and comply with certain established company standards, including but not limited to the prohibition of forced labour and the employment of anyone under the local legal working age. All such standards are outlined in the Employee Code of Conduct. Failure to meet the Kraft Heinz standards on forced labour or minimum age requirements is a violation of corporate policy. Violators are subject to disciplinary action, up to
Training

The most recent version of the Kraft Heinz Employee Code of Conduct is accessible to all employees globally. Kraft Heinz utilises a modular training programme for the various components of the Employee Code of Conduct, meaning the focus of the trainings is established in accordance with the employee’s function within the company.

Kraft Heinz has enhanced the rigour and extent of training being provided to its employees, specifically with regard to those in roles that are more readily exposed to scenarios where forced labour may arise. This targeted and pro-active practice furthers Kraft Heinz's commitment to protecting the rights of workers worldwide, meaning we are better poised than ever to identify actual or potential human rights violations in our supply chain. The increased levels of training provided by Kraft Heinz help us manage human rights protection in our business.

Certification by Direct Suppliers

Kraft Heinz purchasing contracts require suppliers to comply with all laws and regulations applicable to the fulfilment of its duties under the contract and to adhere to the principles contained in the Supplier Guiding Principles. Suppliers are required to certify their compliance with the Supplier Guiding Principles at the request of Kraft Heinz, and are required to permit Kraft Heinz and its designated agents (including any third parties) to engage in monitoring activities, including on-site inspections. If the supplier is unable to resolve any issues Kraft Heinz reserves the right to take additional action against the supplier, including but not limited to termination of the business relationship.

Supplier Compliance Audits

Kraft Heinz reserves the right, either through itself or a designated third party, to verify a supplier’s compliance with the principles contained in the Supplier Guiding Principles. If Kraft Heinz becomes aware of any supplier actions or conditions not in compliance with Kraft Heinz’s communicated standards, including the principles contained in the Supplier Guiding Principles, such actions or conditions are subject to review by Kraft Heinz. Kraft Heinz reserves the right to require corrective actions be taken and/or to terminate any such agreement with a supplier.

Verification and Due Diligence Processes for Slavery and Anti-trafficking

Kraft Heinz believes a critical aspect of a resilient, effective Anti-Slavery and Anti-Trafficking approach sits within the due diligence process. We undertake both internal and external practices to assess potential negative human rights impacts in our business operations and global supply chain.

Assessment - Kraft Heinz is conducting a risk assessment to identify potential and actual negative human rights impacts. This includes an evaluation of geographical, economic and social criteria to determine points our value chain where risk is highest, and where we can next make the
greatest impact.

Management - We will use the information obtained in the risk assessment process and stakeholder feedback to further inform our efforts to prevent, mitigate and manage human rights risk, including integration into day-to-day operations, relevant internal and external risk management systems, training protocols and the implementation of several global policies.

Kraft Heinz is committed to addressing any adverse human rights impacts which we have caused or to which we have contributed, and expect our suppliers, business partners and other relevant stakeholders to do the same. Reports from any party received through our Grievance Mechanism or any other medium, are reviewed within 24 hours by the Chief Ethics & Compliance Officer during a preliminary assessment, and further addressed by executive leadership as appropriate. We do not tolerate retaliation and anonymity is guaranteed. We have not and will not impede the access to state-based judicial or non-judicial mechanisms for any persons raising allegations through our Grievance Mechanism.

Tracking – Going forward, Kraft Heinz will track the effectiveness of its management of negative human rights impacts through the monitoring of and engagement with our suppliers, business partners and other relevant stakeholders. Kraft Heinz will provide biennial public disclosure on its effectiveness.

Communications - Kraft Heinz actively communicates the human rights guiding principles and expectations set out in our Global Human Rights Policy to employees, suppliers, business partners and other stakeholders via both disclosure and engagement. The Policy is public via the Kraft Heinz Corporate Website and also internally. When needed, local translation is provided.

Grievance Mechanisms - Kraft Heinz provides several ways for employees, suppliers, business partners and other stakeholders to raise concerns or complaints. This includes the reporting of potential misconduct to managers, Human Resource professionals, the Legal Department and the Ethics & Compliance team, and our confidential Ethics & Compliance Hotline. The Hotline is open to all stakeholders, including rightsholders, is maintained by a third-party provider and has multilingual staff available 24 hours a day. Reports can be made via country-specific toll-free phone numbers, or online.

Measuring our effectiveness

Kraft Heinz will continue to update its policies and procedures applicable to its supply chain as Kraft Heinz, our brands and our supply chain evolves.