

2025 Modern Slavery Statement

Kellanova Australia

CONTENTS

About this Statement	3
Consultation.....	4
Our Structure, Operations and Supply Chains.....	5
Our Approach to Human Rights.....	8
Identifying and Addressing Human Rights Risks.....	12
Case Studies:	
Verifying cocoa supply chains and supporting child labour prevention at origin.....	16
Certification-led approaches to addressing labour risks in palm oil supply chains.....	17
Kellanova’s grievance mechanism and approach to remediation.....	18
Assessing the Effectiveness of our Actions.....	21
Looking Ahead.....	23
Approval.....	23

ABOUT THIS STATEMENT

This Modern Slavery Statement outlines Kellanova Australia's commitment to respecting and advancing human rights within our operations and supply chains.

Prepared in accordance with the Australian Modern Slavery Act 2018, the statement is issued on behalf of Kellogg Australia Holdings Pty Ltd (ACN 102 893 952) and its wholly owned subsidiary Kellogg (Aust.) Pty Ltd (ACN 004 110 105) (collectively referred to as Kellanova Australia).

The statement describes the key actions undertaken during the 2025 reporting period to identify, assess and address potential risks of modern slavery within Kellanova Australia's operations and supply chains, drawing on Kellanova's global human rights and responsible sourcing frameworks where applicable. It covers the structure, operations and supply chains of Kellanova Australia for the period ending 31 December 2025.

As Kellanova Australia's employees and suppliers are engaged through Kellogg (Aust) Pty Ltd, both reporting entities operate within the same organisational structure and share common operations, supply chains, governance arrangements and Board of Directors.

This statement was approved by the boards of Kellogg Australia Holdings Pty Ltd and Kellogg (Aust.) Pty Ltd on 26/06/26.

The table below outlines where each of the mandatory reporting criteria under the Australian Modern Slavery Act is addressed in this statement.

The table below identifies where each mandatory reporting criterion is disclosed within this statement.

Mandatory Criteria	Reference in this statement	Page Number
Criterion 1: Identify the reporting entity	<ul style="list-style-type: none"> About this Statement 	3
Criterion 2: Describe the reporting entity's structure, operations and supply chains	<ul style="list-style-type: none"> Our Structure, Operations and Supply Chains 	5
Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	<ul style="list-style-type: none"> Our Approach to Human Rights Identifying and Addressing Human Rights Risks Case Studies 	8 12 16
Criterion 4: Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address these risks, including due diligence and remediation processes	<ul style="list-style-type: none"> Our workforce Identifying and addressing human rights risks. Case studies Kellanova's grievance mechanism and approach to remediation 	7 12 16 18
Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions	<ul style="list-style-type: none"> Assessing the Effectiveness of our Actions 	21
Criterion 6: Describe the process of consultation with any entities the reporting entity owns or controls	<ul style="list-style-type: none"> Governance Consultation 	11 4
Criterion 7: Provide any other relevant information	<ul style="list-style-type: none"> Looking Ahead 	23

CONSULTATION

During the reporting period, Kellanova Australia consulted with a wide range of internal stakeholders across our local, regional, and global business units to support the preparation of this Modern Slavery Statement. This included input from Kellanova (global parent), Kellogg Australia Holdings Pty Ltd and Kellogg (Aust) Pty Ltd.

As this is a joint statement, consultation occurred with both reporting entities covered by this statement - Kellogg Australia Holdings Pty Ltd and its wholly owned subsidiary Kellogg (Aust) Pty Ltd. The preparation of the statement was a collaborative effort involving Corporate Affairs, Human Rights and Responsible Sourcing leads at both Kellanova and Kellanova Australia.

Senior leadership with responsibility for human rights and responsible sourcing were involved in the review of this statement, including oversight by Kellanova's global Chief Sustainability Officer.

In addition, LRQA was engaged to provide independent review and advice on the statement and Kellanova Australia's modern slavery and human rights approach, to help inform ongoing improvements to strategy, actions and reporting.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS



During 2025, Kellanova was a leading international food company operating in the snacking, cereal, and noodles categories, with iconic, world-class brands including Kellogg's®, Cheez-It®, Pringles®, Pop-Tarts®, Eggo®, MorningStar Farms®, RXBAR®, and LCMs®.



During 2025, Kellanova Australia was a part of the global Kellanova business. For the purposes of this statement, references to "Kellanova Australia" relate specifically to Kellanova's Australian operations, while references to "Kellanova" refer to the legacy global Kellanova company which became part of the Mars Incorporated group in December 2025.

Headquartered in the US, Kellanova operates manufacturing facilities in 20 countries, markets its products in 180 countries, and employs approximately 23,000 people worldwide.

Kellanova Australia's principal place of business is located at Suite 801, Level 8, 8 Central Ave, Eveleigh NSW 2015.

In December 2025, Kellanova Australia, like other parts of the Kellanova global business, became part of the Mars Incorporated group following the completion of an acquisition.

Our operations and manufacturing sites:

Kellanova Australia is a food manufacturing and distribution business. Our operations include:

- Procuring ingredients, materials and logistics services
- Manufacturing cereal and snack products, both locally and regionally
- Importing finished products for sale in Australia
- Distributing food products under the Kellogg's®, Pop-Tarts® and Pringles® brands
- Exporting products for sale in selected regional markets, including New Zealand, the South Pacific and parts of Asia
- Marketing and sales activities, including the production of advertising and promotional content
- Investing in local research and development to support product innovation and growth
- Implementing sustainability and social impact initiatives as part of the broader Kellanova global framework.

Our local manufacturing facility in Botany, Sydney, has been operating since 1928. This site produces the majority of our Kellogg's® cereal products sold in Australia, including Kellogg's Corn Flakes®, Rice Bubbles®, Sultana Bran® and Nutri-Grain®.

Where feasible, we prioritise local manufacturing and sourcing, subject to the availability of inputs that meet required quality, specification and supply requirements. In 2025, approximately 68% percent of the total volume of Kellanova products sold in Australia was manufactured locally.

In addition to local manufacturing, Kellanova Australia imports finished products from other Kellanova-owned manufacturing facilities located in Malaysia, Thailand, South Korea and the United States. These facilities form part of Kellanova's global operations. The remaining proportion of finished products are sourced from third party manufacturers including co-manufacturers, as described on page 6.

Kellanova products sold in Australia are manufactured using a diverse range of agricultural and other raw material ingredients sourced through Kellanova-owned manufacturing operations from multiple countries globally. This sourcing footprint informs our modern slavery risk assessment, with a subset of ingredients and sourcing countries identified as higher risk, as outlined later in this statement.

Our supply chain:

Kellanova Australia's supply chain comprises third-party suppliers that support its Australian operations across inputs, services and outsourced manufacturing activities. These relationships form part of Kellanova Australia's external supply chain and are distinct from Kellanova owned manufacturing operations that supply finished products into the Australian market.

Kellanova Australia works with approximately 650 direct and indirect suppliers across the following categories:

- **Ingredients** used in the manufacture of food products, including corn, wheat, rice, potato flakes, vegetable oils, sugar, and cocoa
- **Packaging suppliers** providing carton board, corrugated and plastics packaging used to distribute and sell our products.
- **Logistics providers**, including sea, road and rail partners, supporting the import of products into Australia and distribution across Australia and New Zealand
- **Contracted labour services**, including cleaning, supplementary labour, maintenance and engineering services at our facilities
- **Third-party contracted service providers**, including marketing and sales support, as well as legal, consulting, information technology and recruitment services.

Kellanova Australia has long-standing, productive, multi-generational relationships with a number of our largest Australian suppliers, including Manildra, Corson, Sugar Australia and Sunrice, which play an important role in supporting local manufacturing operations. Engagement with these and other suppliers is undertaken through regular, structured joint business planning meetings which address operational performance, sustainability priorities and shared commitments to respecting and protecting human rights across our supply chains.

Kellanova Australia also sources a limited volume of finished products from a small number of third-party co-manufacturing partners, located in Australia, Belgium, India and Malaysia, which form part of our supply chain. Not owned or operated by Kellanova Australia, these sites manufacture products to Kellanova specifications under contractual arrangements. All co-manufacturing locations, both domestic and international, are required to comply with Kellanova's Global Supplier Code of Conduct and are included within Kellanova's global supply chain due diligence framework.



Our workforce:

As at the end of 2025, Kellanova Australia employed over 400 people across our head office and manufacturing site. This workforce is supported by approximately 100 contractor workers engaged through labour-hire arrangements, primarily for supplementary labour, cleaning, maintenance and engineering services.

All directly employed workers are engaged under employment contracts governed by Australian employment laws and applicable industrial instruments. We respect our employees' rights to freedom of association and collective bargaining and have an enterprise agreement in place with operators at our Botany manufacturing site, negotiated with union representatives and most recently renewed in 2025. The majority of directly employed operators at Botany are union members.

Contract workers engaged at our sites are employed through established, reputable labour-hire service providers with whom Kellanova Australia has longstanding relationships. We undertake periodic reviews of these providers' labour practices, including reviewing workers' terms and conditions and conducting on-site checks. This helps us assess compliance with applicable legal requirements and with the Kellanova Global Supplier Code of Conduct, which, amongst other things, prohibits forced labour, child labour, recruitment fees and restrictions of workers' freedom of movement.

OUR APPROACH TO HUMAN RIGHTS



Kellanova Australia recognises and respects all internationally recognised human rights, as set out in the International Bill of Human Rights, including the Universal Declaration of Human Rights, and the core labour standards of the International Labour Organization (ILO), which comprise the eight fundamental conventions set out in the Declaration on Fundamental Principles and Rights at Work.

We are committed to respecting human rights across our operations and supply chains, in line with our policies and international standards. This commitment underpins how we conduct our business and engage with our employees, suppliers and other business partners. Our approach to human rights is informed by the UN Guiding Principles on Business and Human Rights (UNGPs) and is embedded across our governance framework, policies, risk assessment processes and supplier standards. These elements are described in further detail in the sections that follow.

Modern Slavery risks in our operations and supply chains

Our approach to identifying, assessing and managing human rights risks in our operations and supply chains, including risks of modern slavery, is informed by the UNGPs. In line with the UNGPs, Kellanova undertook a structured, global human rights risk assessment in 2019 to identify salient human rights issues – those rights that are at risk of the most severe negative impact through our business activities or business relationships. The assessment identified the following salient human rights issues: forced labour, child labour, migrant labour, health and safety, discrimination and harassment, and wages.

For the purpose of this Modern Slavery Statement, we focus on those salient human rights issues that may give rise to modern slavery practices as defined under the Australian Modern Slavery Act 2018. In this context, the most relevant risks are related to forced labour, child labour and certain forms of labour exploitation experienced by migrant workers and temporary workers.

Consistent with the UNGPs, we recognise that there are inherent risks that fast-moving consumer goods (FMCG) companies may be involved in modern slavery practices in three ways:

- Causing modern slavery, where our actions directly result in harmful practices, for example, through inappropriate recruitment or employment practices
- Contributing to modern slavery, where our actions or omissions facilitate or incentivise harmful practices, for example, through commercial practices that place undue pressure on suppliers
- Being directly linked to modern slavery, where harmful practices occur in our supply chains or other business relationships and are connected to our products and services, even if we did not cause or contribute to the harm.

Based on our risk assessment, we consider that the most significant modern slavery risks are more likely to arise within certain parts of our extended supply chain rather than within our directly managed operations. Taking into account the nature of our Australian operations, together with our governance frameworks and current monitoring processes and controls, the risk of modern slavery occurring within our direct operations is assessed as low. The nature of global agricultural and food supply chains means that modern slavery risks are more likely to arise deeper in the supply chain, where visibility and leverage are limited. These risks may be associated with the use of vulnerable labour, including migrant workers and children, as well as the involvement of third-party labour intermediaries in higher-risk contexts.

Examples of key areas where modern slavery risks may arise within Kellanova Australia's supply chains through our business relationships with our suppliers include:

- **Migrant labour in Tier 1 supplier operations:** We source ingredients and packaging materials from Tier 1 suppliers that operate in sectors and countries that employ a significant number of migrant workers such as the manufacturing sector in Malaysia. In these contexts, there is an elevated risk of exploitative recruitment practices, particularly where suppliers engage third-party labour hire agencies to recruit and manage workers. Potential risks may include the charging of recruitment fees or the retention of identity documents.
- **Migrant labour in Kellanova group manufacturing sites:** In addition to third-party suppliers, Kellanova Australia also sources certain products from manufacturing sites operated by other Kellanova business units, including in South Asia. Some of these sites engage migrant workers through third-party recruitment agencies, which may present inherent risks of exploitative recruitment practices.
- **Use of third-party labour providers in manufacturing and food processing supply chains:** Parts of Kellanova Australia's supply chain include manufacturing and food processing suppliers that operate in jurisdictions with varying labour standards and enforcement capacity, including higher-income countries such as the United States. In these environments, suppliers may rely on third-party labour providers to recruit and manage temporary or subcontracted workers to meet production demands. Where oversight of labour providers is inadequate, this model can elevate risks of labour exploitation, including situations involving vulnerable workers or minors engaged in hazardous or excessive work.
- **Upstream agricultural supply chains:** Kellanova Australia sources agricultural ingredients from extended, multi-tier supply chains, including commodities produced by smallholder farmers. Certain upstream agricultural supply chains, most notably cocoa, present inherent risks of child labour and other forms of labour exploitation at the farm level. These risks are often driven by structural factors such as poverty, price volatility, limited access to education and weak labour protections and are typically located upstream of Tier 1 suppliers, beyond direct contractual relationships.

How we assess and address these risks is described in the following sections of this statement.

Our Policies

Kellanova's [global Human Rights Policy](#) formalises our commitment to respecting human rights and provides the overarching framework for identifying, assessing and addressing our salient human rights risks, including risks related to modern slavery, across our operations and supply chains.

This policy operates alongside our [Global Code of Ethics](#), [Global Supplier Code of Conduct](#) and our [Policy Prohibiting Involuntary Labor](#), which together set out clear expectations regarding responsible conduct and compliance with human rights standards for our employees, suppliers and business partners.

Our Global Supplier Code of Conduct outlines the standards and business practices we require of suppliers in relation to management practices, business integrity, quality, health and safety, sustainability, land use and labour standards. It applies to all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants. Suppliers are expected to comply with both the intent and letter of the Code and to implement appropriate processes to promote compliance among their employees and across their own supply chains, including sub-tier suppliers. These expectations are supported by Kellanova Australia's supplier monitoring, engagement and verification activities, as described in the following due diligence sections.

Governance

Effective governance is critical to embedding a commitment to upholding human rights and managing modern slavery risks across Kellanova Australia's operations and supply chains. In line with Kellanova's global human rights strategy, governance of human rights and modern slavery risks is overseen at Board level and supported through executive leadership, cross-functional management and dedicated working groups. In 2025, this governance framework operated as follows:

- **Board oversight:** Oversight of global social issues, including human rights and modern slavery, sits with the Kellanova Board of Directors and is supported by the Board's Social Responsibility and Public Policy sub-committee.
- **Executive accountability:** At a global executive level, responsibility for human rights is led by the Chief Sustainability Officer, who reports to the Senior Vice President, Chief Global Corporate Affairs Officer.
- **Operational management:** Day-to-day management of human rights and modern slavery matters is undertaken collaboratively across Corporate Affairs, Procurement, Legal, Human Resources and Supply Chain functions, ensuring that human rights considerations are embedded into business decision-making, supplier engagement and operational processes.
- **Local implementation and reporting:** In Australia, a Human Rights Working Group comprising representatives from Corporate Affairs, Sustainability, Legal and Procurement coordinates local implementation of Kellanova's human rights strategy. The working group works closely with the Kellanova AMEA (Africa, Middle East, and Asia) Responsible Sourcing and Procurement teams and the Kellanova Global Sustainability team to support ongoing due diligence activities and the preparation of Kellanova Australia's Modern Slavery Statement.

In 2025, Kellanova Australia underwent an independent assessment of systems and processes against Kellanova's Responsible Sourcing Program. The assessment reviewed the design and operation of our internal systems, data management processes, risk frameworks, supplier engagement approaches and responsible sourcing commitments, including how supplier social compliance requirements are established and monitored through contractual obligations such as the Global Supplier Code of Conduct and supplier contracts. Focused on a review of systems and governance processes, the assessment observed that Kellanova Australia's Responsible Sourcing Program is supported by established systems and governance arrangements, with the use of data platforms, risk frameworks, supplier relationships and external partnerships contributing to the integration of responsible sourcing considerations into business operations.

IDENTIFYING AND ADDRESSING HUMAN RIGHTS RISKS



Kellanova Australia applies a risk-based approach to identifying, assessing, preventing and mitigating potential and actual human rights impacts, including modern slavery risks, across our own operations and our direct and extended supply chains.

Our approach combines internal risk assessment processes with credible external data sources, supplier engagement and collaboration with industry partners and civil society. Beyond our own operations, due diligence activities extend to Tier 1 ingredient and packaging suppliers and, where relevant, to upstream agricultural supply chains associated with high-risk commodities, geographies and labour practices.

During 2025, we continued to implement and strengthen supplier- and site- level monitoring and engagement activities, alongside initiatives designed to address root causes of modern slavery risks in high-risk supply chains.

Building employee awareness and capability

To embed our commitment to upholding human rights across our operations and support employees to identify, prevent and respond to potential modern slavery risks, all salaried employees at Kellanova Australia are required to complete mandatory human rights training every two years. The most recent training was delivered in 2025, with a completion rate of 99 percent among our salaried employees. Employees also undertake regular training on Kellanova's Global Code of Ethics which reinforces our expectations regarding ethical conduct, respect for human rights and responsible sourcing. In addition, regular townhall sessions help raise awareness of human rights issues and communicate our policies, standards and expectations to employees across the business.

In 2025, we further strengthened Kellanova Australia's human rights risk assessment capability by introducing targeted training and internal tools for commercial and operational functions that work closely with our suppliers. These measures support the practical integration of human-rights and modern slavery considerations into supplier engagement and decision-making.

This included training on Kellanova's Tier 1 supplier engagement program and the rollout of internal dashboards providing visibility over supplier Sedex membership, SMETA audit status and reported non-conformances, as well as country-of-origin information for key ingredients. Together, these tools support our employees working closely with suppliers to undertake informed, risk-based supplier assessments, including consideration of geographic risk indicators when onboarding or reviewing suppliers.

Third-party audits of Kellanova-owned sites

Kellanova Australia undertakes third-party assessments of owned operations located in high-risk geographies as part of our approach to assessing and managing potential human rights risks, including risks of modern slavery. These assessments are conducted within the context of Kellanova's global human rights policies and governance framework and focus on Kellanova-owned manufacturing sites that supply products into Australia.

Kellanova primarily uses the Sedex Members Ethical Trade Audit (SMETA) methodology for these assessments, while also recognising and accepting other reputable and equivalent audit frameworks, including the LRQA responsible sourcing audit. Audit frequency is determined on a risk basis.

During the reporting period, two Kellanova-owned manufacturing sites supplying products into Australia were subject to third-party audits. These included a SMETA 4-pillar audit at a manufacturing site in the United States and a LRQA responsible sourcing audit at a manufacturing site in Thailand. Neither audit identified indicators of modern slavery risks. A further third-party audit of a Kellanova-owned manufacturing site in Malaysia is scheduled for early 2026 in accordance with our risk-based audit planning.

In addition to third-party audits, our approach to due diligence for owned operations is supported by broader processes implemented across Kellanova at a global level and applied within Kellanova Australia's operations. These include management oversight of labour practices, periodic reviews relating to the use of contractors where applicable, employee training on ethics and human rights, and access to grievance mechanisms that enable concerns related to labour practices to be raised confidentially. Information from these processes is considered alongside audit outcomes when assessing potential risks and determining appropriate responses.

Monitoring suppliers

We use the SEDEX platform to support supply chain visibility, supplier risk profiling and ongoing performance management.

In-scope suppliers are encouraged to register on the Sedex platform and link their sites to Kellanova. We actively reach out to suppliers to ensure completion of the Sedex Self-Assessment Questionnaire (SAQ) through which information on business practices, management systems, policies, and workers is shared. In addition, we encourage suppliers to maintain up to date SMETA audits, allowing Kellanova Australia to monitor audit status, including open non-conformances and corrective action progress, on a site-by-site basis.

In-scope suppliers include:

- Tier 1 suppliers representing the top 80 percent of expenditure
- Suppliers linked to high-risk commodities
- High-risk indirect services, such as logistics and the provision of contracted labour (e.g., cleaning and security)

We have set an annual target to maintain 80 percent of in-scope suppliers registered and active on Sedex, with at least 80 percent of all sites linked. As of December 2025, within the Kellanova AMEA region (Africa, Middle East and Asia), of which Kellanova Australia is a part, 85 percent of in-scope suppliers were registered and linked on Sedex, representing a 5 percent increase compared to 2024.

Capturing worker voices and building supplier capability

In 2025, Kellanova continued to implement its global Tier 1 supplier engagement program in partnership with LRQA, focussing on suppliers operating in geographies and sectors where elevated labour risks may be present. The program deploys specialised, worker-centred surveys designed to capture worker experiences and identify labour risks that may not be visible through on-site assessment alone. Kellanova Australia participates in this program where supplier sites are relevant to our operations.

The survey methodology is tailored to supplier risk profiles and focuses on issues that are often difficult to detect, such as wages, overtime, discrimination and forced labour. Where relevant, the survey tool deployed is aligned with the International Labour Organization (ILO) indicators of forced labour, particularly at sites with a higher presence of migrant workers. Kellanova, in partnership with LRQA uses the survey findings to identify priority labour issues and inform targeted actions intended to support worker well-being.

A core feature of the program is the use of confidential worker surveys to capture anonymous, first-hand insights from a statistically significant sample of workers. Surveys are completed by workers on their own mobile devices via a secure online platform, accessed through a hyperlink or QR code. This approach enables candid feedback from individuals with direct knowledge of working conditions and drivers of exploitation.

Supplier sites are selected based on Kellanova's global human rights risk assessment, which categorises Tier 1 suppliers into minimum, specialised, moderate and priority risk segments according to commodity and country risk factors. Initially launched in 2020 with priority-risk ingredient and packaging suppliers, the program has since expanded to include moderate-risk suppliers across a broader range of supplier categories, including temporary labour providers.

Between 2020 and 2024, 37 suppliers participated globally. In 2025, an additional 11 suppliers with sites across 11 countries were engaged, bringing total participation to 48 suppliers. This included four supplier sites supplying to Kellanova Australia. Across these four sites, 206 workers participated in surveys.

Where labour risks were identified through worker surveys, relevant suppliers were supported to undertake root cause analysis and develop and implement time-bound corrective action plans. Implementation of these actions was supported through targeted capability building activities and training. By the end of 2025, corrective actions were completed at all but one site, with actions at the remaining site scheduled for completion in 2026.

Strengthening child labour risk assessment and remediation through multi-stakeholder collaboration

In 2025, AIM-Progress published child labour remediation resources to support companies in identifying and addressing child labour risks in the manufacturing sector in the United States. Kellanova participated in the AIM-Progress working group that helped shape these resources, contributing practical insights to support effective remediation and stakeholder engagement. This work builds on the remediation framework initiated in 2024 and reflects Kellanova's continued engagement in collaborative, industry-led efforts to address child labour risks.

Engaging and supporting farmers in high-risk ingredient supply chains

Through **Kellanova's Origins™** programs, we assess and address human rights risks, including modern slavery, within high-risk agricultural commodity supply chains. These commodities underpin key ingredients used in Kellanova products and may be sourced, in part, from regions where structural labour risks have been identified. Where relevant, these programs also support farmer resilience through technical assistance, improved agricultural practices and access to markets.

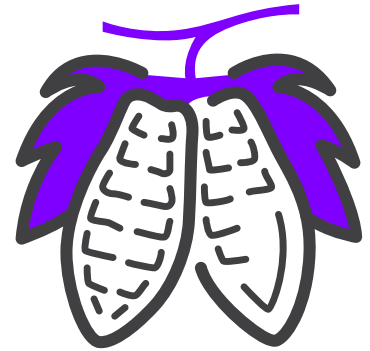
To inform this work, Kellanova draws on data from a range of external sources, including the U.S. Department of Labor's Bureau of International Labor Affairs (ILAB), AIM Progress, the Consumer Goods Forum, Verité, the Fair Labor Association (FLA) and other partners, to identify priority agricultural commodities for which modern slavery risks may arise when sourced from certain countries.

Following updates to sourcing arrangements and associated risk assessments during the reporting period, the following commodity and sourcing country combinations relevant to Kellanova Australia's extended agricultural supply chain have been identified as higher risk in 2025:

- Cocoa sourced from Ghana and Côte d'Ivoire
- Palm Oil sourced from Malaysia and Indonesia
- Sugar sourced from Thailand

Selected case studies provided on the following pages illustrate Kellanova's approach to assessing and addressing modern slavery risks, reflecting that mitigation activities are tailored to different commodity contexts and stages of engagement.

CASE STUDY: VERIFYING COCOA SUPPLY CHAINS AND SUPPORTING CHILD LABOUR PREVENTION AT ORIGIN



Cocoa supply chains in Côte d'Ivoire are recognised as presenting heightened risks of child labour, driven by factors such as poverty, limited access to education and reliance on smallholder farming systems. These risks are typically located upstream of Tier 1 suppliers, beyond direct contractual relationships.

Since 2022, Kellanova has partnered with Enveritas, an independent non-profit organisation specialising in the verification of complex smallholder supply chains, to assess and monitor human rights and environmental risks associated with cocoa sourcing in Côte d'Ivoire. This partnership provides increased visibility into Kellanova's cocoa sourcing footprint and associated risks and supports progress towards the goal of sourcing 100 percent responsibly sourced cocoa by 2030. Each year, we are working to increase the proportion of our cocoa that is verified as responsibly sourced through Enveritas.

While assessment and verification are critical components of cocoa sourcing due diligence, we recognise that addressing child labour risks in cocoa-growing regions also requires long-term, community-based interventions that address underlying social and economic drivers.

In 2025, we continued our partnership with the Ivorian NGO Movement for Education, Health, and Development (MESAD) to strengthen access to education and improve livelihoods in cocoa-farming communities. Launched in 2024, the partnership aims to support progress toward living incomes for 7,500 smallholder farmers by 2026, including 2,500 women engaged in sustainable cocoa production.

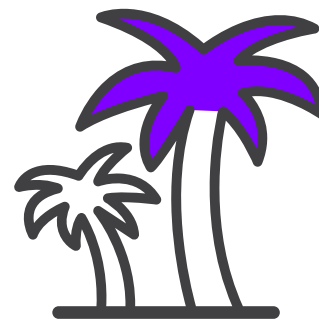
During the year, as part of our partnership, MESAD operated across 15 cocoa-growing communities in the Iffou region. Two priority communities, Sarakakro and Pokoukangakro, were selected due to high numbers of out-of-school children and limited education infrastructure. In these communities, two primary schools were constructed, each comprising three classrooms, offices and sanitation facilities, to directly improve the educational opportunities and pathways for children. These schools now provide access to education for approximately 600 children, including 210 children from cocoa-farming households.

Alongside education investments, MESAD trained 570 cocoa farmers in sustainable agricultural practices, agroforestry and income diversification. In parallel, 340 women received training in agricultural entrepreneurship and financial literacy, resulting in the creation of 22 Village Savings and Loan Associations and two community literacy centres.

Together, these initiatives complement Kellanova's broader cocoa due diligence activities by addressing structural risk factors associated with child labour, strengthening community resilience and supporting more sustainable livelihoods in cocoa-growing regions relevant to Kellanova Australia's extended supply chains.



CASE STUDY: CERTIFICATION-LED APPROACHES TO ADDRESSING LABOUR RISKS IN PALM OIL SUPPLY CHAINS



Palm oil supply chains can present increased risk of adverse labour practices, including forced labour and child labour, particularly in contexts where smallholder farmers face economic vulnerability and limited access to formal markets. Kellanova recognises these potential risks and takes a risk-based, preventative approach that combines responsible sourcing, certification and targeted supplier engagement.

Certified sourcing and labour standards

In 2025, Kellanova achieved its goal of sourcing 100 percent of palm oil for Kellanova plants in the AMEA region through supply chains certified by the Roundtable on Sustainable Palm Oil (RSPO), using a combination of segregated and mass balance models. This ensures all palm oil we procure is RSPO-certified, with certified volumes independently verified across the supply chain.

RSPO certification requires suppliers to comply with the RSPO Principles and Criteria, which include explicit requirements to:

- Respect internationally recognised human rights
- Prohibit forced labour, bonded labour and child labour
- Ensure freedom of association and non-discrimination
- Provide safe and fair working conditions

By sourcing through physically certified supply chains, Kellanova applies a sector-specific, independently governed framework that establishes baseline labour expectations and supports transparency across the palm oil supply base.

Supporting smallholder livelihoods to reduce labour risks

Economic vulnerability is a key driver of child labour and forced labour risks in agricultural supply chains, particularly in smallholder farming systems. Since 2019, Kellanova has partnered with Wild Asia, an impact-driven social enterprise based in Malaysia, through the Small Producer Inclusivity & Resilience Alliance (SPIRAL) program and Wild Asia Group Scheme (WAGS).

SPIRAL integrates independent smallholders into global palm oil supply chains and promotes sustainable and regenerative farming practices. Key features of the program supported by Kellanova include:

- Palm oil sourced through SPIRAL is 100 percent traceable from farm to mill and aligned with No Deforestation, No Peat and No Exploitation (NDPE) commitments, strengthening supply chain oversight.
- Smallholders are supported to progress toward sustainability certification, including RSPO and Malaysian Sustainable Palm Oil Certification Scheme (MSPO), enabling access to higher-value, responsible markets.
- Adoption of regenerative and low-input agricultural practices improve soil health, stabilise yields and reduce cost pressures, contributing to greater farm resilience.

By improving access to certification and higher-value markets, the program contributes to more stable and sustainable household incomes and reduces economic pressure that may lead to reliance on harmful labour practices, including unpaid family labour and child labour.

In 2025, with funding from Kellanova and other SPIRAL partners, the program reached 3,834 smallholder palm oil farmers, including 2,863 independent producers who achieved certification. Of these certified farmers, 31 percent were women and 51 percent identified as Native or Indigenous Peoples. Over time, Kellanova aims to help scale these efforts to reach 10,000 smallholder producers across six regions in Malaysia and Thailand.



KELLANOVA'S GRIEVANCE MECHANISM AND APPROACH TO REMEDIATION



Kellanova is committed to ensuring that workers, suppliers, and other stakeholders have access to safe, confidential and effective mechanisms to raise concerns about potential violations of our values and human rights standards as set out in our policies. Through our Global Supplier Code of Conduct, we also require suppliers to provide effective grievance mechanisms for their workers.

The global Kellanova Ethics Line is a key channel through which we provide employees, suppliers, contractors and members of the public a confidential way to ask questions or report concerns relating to ethics, compliance or any requirements set out in our Global Code of Ethics and Global Supplier Code of Conduct. The Ethics Line is operated by an independent third-party provider and is available 24 hours a day, seven days a week in multiple languages across 21 countries. Concerns can be raised via a toll-free phone number, a dedicated website, or the Kellanova Ethics Line mobile application.

Information about the Ethics Line is included in our Code of Ethics and communicated through "Speak Up" posters displayed at Kellanova facilities in local languages. We also encourage suppliers to communicate the availability of the Ethics Line to workers within their operations.

The Kellanova Ethics Line mobile app is available to anyone and allows users to anonymously submit concerns and track their status. The app also provides access to our Global Code of Ethics, relevant policies, and training materials, supporting awareness and informed use of our grievance mechanisms.

In addition, Kellanova employees can raise people-related concerns through the Employee Portal Information Center (EPIC), an internal platform available from 6 a.m. to 1 a.m. ET, Monday to Friday.

When a concern is raised, the independent operator will prepare a written summary and submit it to Kellanova's Office of Ethics and Compliance. Reports are reviewed and investigated in line with established investigation protocols, with oversight from regional compliance leaders and monitoring at the corporate level. Our objective is to complete investigations within 14 to 45 days, depending on the complexity of the issue. Appropriate actions are taken based on investigation findings, and learnings are used to strengthen controls, enhance compliance and prevent recurrence.

In 2025 most matters reported through the Ethics Line related to human resources questions or employment relations. There were no reports of forced labour. All investigations initiated in 2025 were satisfactorily completed.

Kellanova Ethics Line

- Operated by a third party
- Confidential
- Available 24-7
- Multiple Languages
- Across 21 countries
- Access via:
 - Toll-Free Number
 - Website
 - Mobile App

Our approach to remediation

Kellanova's approach to remediation is informed by the UNGPs and reflects the nature of our operations and supply chain relationships. Where we identify that we have caused or contributed to adverse human rights impacts in our own operations, we seek to take appropriate steps to support remediation. Where human rights risks or impacts are linked to our operations, products or services through our business relationships, our approach focuses on using our influence to prevent, mitigate and address harm.

Remediation activities may be triggered through a range of processes, including grievance mechanisms, third-party audits and other monitoring activities. Where a non-compliance or potential harm is identified, remediation is addressed in a manner proportionate to the severity and nature of the risk or impact.

For Kellanova-owned manufacturing sites, remediation is supported through third-party ethical audits, management oversight of labour practices and access to grievance mechanisms. Where audit findings or other concerns are identified, corrective actions are implemented, monitored and, where relevant, verified through follow-up assessments.

For supply-chain non-conformances identified through ethical audits or worker-engagement activities, Kellanova applies a structured remediation process. This typically includes analysis of root causes, development of time-bound corrective action plans, implementation of corrective and preventive measures, and monitoring and verification of outcomes. We support audited suppliers in addressing identified issues through guidance, e-learning and capacity building initiatives, and we track corrective actions to ensure effective resolution.

Consistent with Kellanova's Policy Statement Prohibiting Involuntary Labour and Global Supplier Code of Conduct, where a violation of these standards, such as forced or involuntary labour, is identified within our supply chain, Kellanova engages with the relevant supplier to support corrective action. Where identified issues are not adequately addressed within agreed timeframes, and continued engagement is unlikely to result in meaningful improvement, Kellanova may escalate its response, including by reconsidering the commercial relationship.

In certain higher risk supply chains, such as palm oil, Kellanova applies a dedicated grievance management and remediation procedure as set out in our Global Policy on Palm Oil. These procedures provide structured, time-bound pathways for raising and investigating allegations of non-compliance, with substantiated issues addressed through corrective action and, where not adequately remediated or where risks are severe, escalation that may include suspension or removal from the supply chain.

Our approach to remediation emphasises prevention, corrective action and continuous improvement, supported by collaboration with suppliers through guidance and capacity-building, while maintaining clear expectations and consequences for non-compliance. This approach is intended to strengthen respect for human rights across Kellanova's operations and supply chains and reduce the risk of modern slavery.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS



At Kellanova Australia, we assess the effectiveness of our actions to identify, prevent and address modern slavery risks in our operations and supply chains through a combination of qualitative and quantitative measures. These measures are informed by the governance arrangements, risk assessment processes and supplier engagement activities described in earlier sections of this Statement.

Drawing on that information, the following indicators were considered in assessing the effectiveness of actions undertaken during the reporting period:

- **Capability-building and internal integration:** In 2025, 99 percent of all salaried employees at Kellanova Australia completed human rights training in line with our two-year training cadence, supporting improved awareness of modern slavery and human rights risks. In addition, targeted training and new internal tools introduced during the reporting year were adopted by Kellanova Australia's relevant commercial and operational teams, supporting more consistent, risk-based consideration of human rights and modern slavery risks in supplier engagement.
- **Supplier transparency and engagement:** During 2025, 85 percent of Kellanova AMEA in-scope suppliers were registered on Sedex and linked with Kellanova, marking an increase of 5 percent compared to 2024. This improved coverage enhanced visibility of supplier compliance information and audit status.*
- **Outcomes of third-party assessments of own operations:** In 2025, third-party audits were conducted at two Kellanova-owned manufacturing sites in the United States and Thailand that supply products into Kellanova Australia. These audits did not identify indicators of forced labour, bonded labour or child labour, providing assurance over labour practices at owned operations supplying the Australian market.
- **Outcomes of Tier 1 supplier engagement:** Insights from worker surveys informed follow up engagement with selected Tier 1 suppliers and contributed to the development and implementation of corrective actions where potential labour risks were identified. Progress against corrective actions was monitored during the reporting period, with actions implemented or underway in line with agreed remediation plans.

2025 Actions

- 99% of Kellanova Australia salaried employees completed human rights training
- 85% suppliers registered on Sedex
- Audits at United States and Thailand sites show no signs of modern slavery

We further considered the outcomes of targeted due diligence and preventative initiatives in high-risk commodity supply chains, as illustrated in the cocoa and palm oil case studies included earlier in this Statement. These outcomes indicate that verification, certification and community-based interventions are contributing to the prevention and mitigation of underlying labour risk drivers beyond Tier 1 suppliers, by strengthening access to education, supporting livelihoods and embedding labour standards.

In assessing effectiveness, we also considered the outcomes of the independent assessment of Kellanova Australia's responsible sourcing systems and processes undertaken in 2025, which observed that our approach is supported by established governance arrangements, risk frameworks, data platforms and external partnerships.

* Kellanova Australia forms part of the Kellanova AMEA region, where suppliers are managed and reported at a regional level across integrated supply chains spanning Australia and Asia. As such, Sedex registration data for in-scope suppliers pertaining to Kellanova Australia only is not separately reported.

LOOKING AHEAD



Kellogg's

SPECIAL

K

Original

e 500g
Serving Suggestion

In 2026, we will continue to strengthen our approach to identifying and addressing modern slavery risks as our governance and reporting arrangements evolve. Building on transition activities initiated in late 2025, our focus will be on supporting alignment of relevant policies, processes and practices with Mars, Incorporated.

As part of our ongoing, risk-based due diligence activities, a third-party audit of a Kellanova-owned manufacturing site in Malaysia is planned for 2026. Based on the site's risk profile, this audit will include a worker-centred labour risk survey to complement audit processes with additional worker-level insights.

In our supply chain, we plan to expand participation in Kellanova's Tier 1 supplier engagement program in 2026 to broaden coverage of priority suppliers. We will also continue our due diligence and risk mitigation activities in our high-risk commodity supply chains, with a focus on addressing underlying labour risk drivers through verification, certification and community-based interventions beyond Tier 1 suppliers.

Looking to 2026

- Integration with Mars policies and due diligence practices
- Conduct site audits of own sites
- Expand participation in Tier 1 supplier engagement program

Approval

The statement has been approved by:



Shubhada Gandhi
Director, Kellanova Australia