



2024 Modern Slavery Statement

Kellanova Australia

Kellanova

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About this STATEMENT

This Modern Slavery statement outlines Kellanova Australia's commitment to protecting and advancing human rights within our operations and supply chain.

Prepared on behalf of the reporting entities 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), this statement complies with the Modern Slavery Act 2018 in Australia.

In this report, we highlight the key actions taken by Kellanova globally throughout 2024 to identify, address, and mitigate the potential risks of modern slavery in our supply chain and operations. The report covers the structure, operations, and supply chain of Kellanova Australia for the period ending December 31st, 2024.

Since Kellanova Australia's suppliers and employees are engaged through Kellogg (Aust) Pty Ltd, both Kellogg Australia Holdings Pty Ltd ACN 102 893 952 and its wholly owned subsidiary Kellogg (Aust.) Pty Ltd ACN 004 110 105 share the same operations, supply chain, governance framework and Directors.

This statement was approved by the boards of both reporting entities covered by this statement. The boards of Kellogg Australia Holdings Pty Ltd and its wholly owned subsidiary Kellogg (Aust.) Pty Ltd approved this statement on page 27.

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	6
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 RightsIdentifying and Addressing Human Rights RisksCase Studies	8 10 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">Identifying and Addressing Human Rights RisksCase StudiesKellanova's grievance mechanism	10 16 22
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	24
Criterion 6: Describe the process of consultation with any entities the reporting entity owns or controls	<ul style="list-style-type: none">Consultation	4
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CONSULTATION

During the reporting period, a wide range of internal stakeholders across our local, regional, and global business units have been consulted in the preparation of this statement including those from Kellanova Company, Kellogg Australia Holdings Pty Ltd and Kellogg (Aust) Pty Ltd.

In order to prepare this joint statement, we engaged with both reporting entities (i.e. Kellogg Australia Holdings Pty Ltd and Kellogg (Aust) Pty Ltd) covered by this statement and consulted both entities we own/control. The preparation was a joint effort by the Corporate Affairs, Human Rights and Responsible Sourcing leads at Kellanova Company and Kellanova Australia. Kellanova Directors, including Kellanova's global Chief Sustainability Officer and the Managing Director of Kellogg Australia Holdings Pty Ltd and Kellogg (Aust) Pty Ltd have been involved in the development and review of the statement.

In addition, LRQA was engaged to review our report and actions to date, and to provide advice on how to continue strengthening our human rights strategy and reporting.

A Message from ANTHONY HOLME

In 2024, we celebrated 100 years of Kellanova (formerly the Kellogg Company) in Australia, marking a century of dedication to responsible business practices, as well as a continued commitment to sourcing from Australian farmers, having been the largest purchaser of maize in Australia since 1961.

As one of the oldest and most trusted food businesses in Australia, we have always prioritised doing good as much as doing well. We uphold integrity as one of our core values and live our Better Days Promise™ which means we aim to have a positive impact across our supply chain.

I'm incredibly proud that our dedication to sustainable and equitable business practices continues to be recognised. In 2024, Kellanova Australia received a number of credible third-party endorsements including being recognised as an Employer of Choice for Gender Equality by Workplace Gender Equality Agency (WGEA) for a sixth consecutive year and being included on the Seramount Global Inclusion Index.

As a responsible organisation, we recognise our crucial role in combating modern slavery and protecting fundamental human rights within our operations and supply chain. This report highlights our continued commitment to ensuring ethical practices and safeguarding the dignity of all individuals engaged throughout our business.

Key highlights from this year's report include our focus on:

- **Ethical Sourcing:** We continue to prioritise ethical sourcing of ingredients and materials, ensuring that our supply chain supports fair labour practices and sustainable farming methods.
- **Strengthened Supplier Partnerships:** Partnering with our suppliers to ensure that our operations do not infringe on people's human rights.
- **Facility Audits:** Conducting audits on our owned facilities to maintain high standards of ethical practices.
- **Employee Education:** Educating our people about our policies and the importance of combating modern slavery.
- **Sustainability Initiatives:** Continued investments in sustainability and social impact programs aimed at creating positive change in the communities we serve, focusing on environmental conservation and social equity.
- **Embedding a Safety-First focus:** Emphasising people safety in our owned facility, with a focus on achieving a zero-injury workplace.

Our 2024 report is a clear demonstration of our ongoing dedication to fostering a safe and ethical environment for everyone, in partnership with our suppliers. Together, we will continue to make significant strides towards the ultimate goal of eradicating modern slavery.

Sincerely



Anthony Holme
Managing Director



OUR VISION

To be the world's best performing snacks-led powerhouse, unleashing the full potential of our differentiated brands and our passionate people.

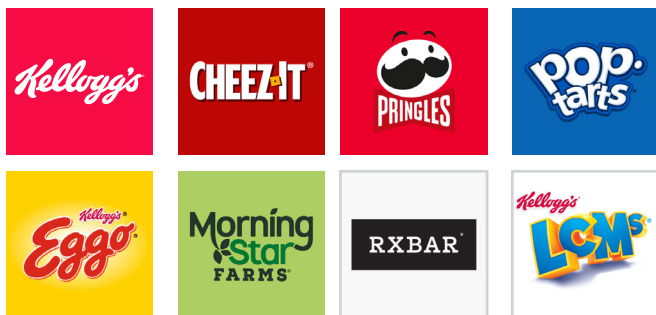
OUR PURPOSE

Creating better days and a place at the table for everyone through our trusted food brand.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS



Kellanova Australia is a part of the global Kellanova Company which is a leading food company in snacking, cereal, and noodles, with iconic, world-class brands including Kellogg's®, Cheez-It®, Pringles®, Pop-Tarts®, Eggo®, MorningStar Farms®, RXBAR®, and LCMS®.



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

Kellanova Australia's principal place of business is located at Suite 801, Level 8/8 Central Ave, Eveleigh NSW 2015 Australia. As at end of 2024, Kellanova Australia employed over 400 people, plus around 100 contractors, across our head office and manufacturing site.

Our local manufacturing facility in Botany, Sydney NSW, has been in operation since 1928, producing most of our Kellogg's® cereals sold in Australia including Corn Flakes, Rice Bubbles®, Sultana Bran® and Nutri-Grain®.

Throughout 2024, we continued to import products from other Kellanova owned facilities in Malaysia, Thailand, South Korea and the United States, while maintaining a handful of long-term co-manufacturing relationships with partners in Australia, Belgium and Malaysia.

Operations:

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

- Procuring ingredients, materials, and logistics services
- Producing cereal and snack products, both locally and regionally
- Distributing foods under the Kellogg's®, Pop-Tarts®, Pringles® and Cheez-It® brand
- Importing products for sale in Australia
- Exporting products for sale in regional markets including New Zealand, South Pacific and Asia



- Marketing and sales activities including the production of advertising content to promote our products to Australian households
- Investing in local R&D to create new products that cater to the unique preferences of our consumers, driving innovation and growth
- Implementation of sustainability and social impact programs around the globe.

Supply chain:

Supporting our Australian operations, we work with approximately 600 direct and indirect suppliers, covering:

- Ingredients used to make our foods including corn, wheat, potato flakes, vegetable oils, sugar, and cocoa
- Packaging suppliers who provide packaging materials to distribute and sell our products, with carton board, corrugated and plastic our principal packaging materials.
- Sea, road and rail logistics partners to import products to Kellanova Australia, and distribute across Australia and New Zealand to our customers
- Contracted labour services for cleaning, supplementary labour, maintenance and engineering services at our facilities, and
- Contracted third-party partners including marketing and sales support, as well as legal, consulting, IT and recruitment services.

In 2024, 70% of the total volume of Kellanova products sold within Australia was made locally, using locally sourced ingredients. The remaining volumes are imported from Malaysia, Thailand, USA and Belgium.

As a company we have many long-standing, productive, multi-generational relationships with some of our biggest suppliers including Manildra, Corson, Sugar Australia and Sunrice. We continue to engage with these and other suppliers through joint business planning meetings which cover our operations, sustainability initiatives and our aligned commitments to protecting people's human rights within our businesses.

OUR APPROACH TO HUMAN RIGHTS



Kellanova Australia supports all internationally recognised human rights as codified in the 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.

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.

Inherent risks in our operations and supply chains

Our approach to identifying, mitigating, and managing human rights risks, including risks of modern slavery practices, in our operations and supply chain is informed by the UN Guiding Principles on Business and Human Rights (UNGPs). In line with the UNGPs we have identified our salient human rights issues, those rights at risk of the most severe negative impact through our own business activities or business relationships, which include:

- Forced Labour
- Child Labour
- Migrant Labour
- Health and Safety
- Discrimination and Harassment
- Wages

Our policies

Our [Global Human Rights Policy](#) highlights these salient human rights risks within our operations and global supply chain and details our strategy for prevention and mitigation. Together with the [Global Code of Ethics](#), [Supplier Code of Conduct](#) and our [Policy Prohibiting Involuntary Labour](#), the Human Rights Policy clearly articulates our human rights expectations to our employees, suppliers and supply chain partners.

Our Global Supplier Code of Conduct outlines the standards and business practices we require of all our direct and extended suppliers in the areas of management practices, business integrity, quality, health and safety, sustainability and land use, and labour standards. It extends to all tiers of suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants. Further, it is the supplier's responsibility to ensure compliance with both the intent and letter of this Code among



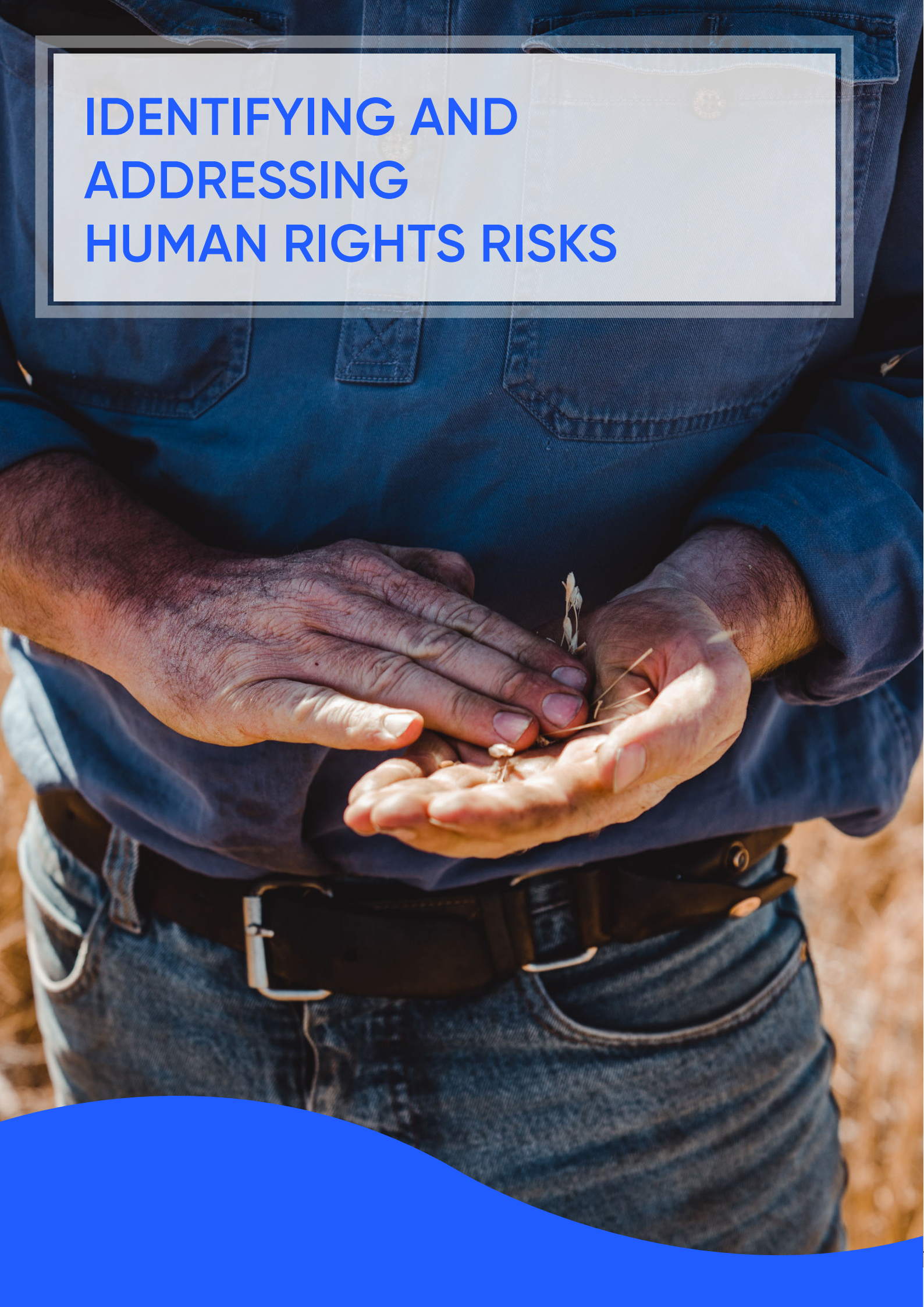
all employees and throughout its supply chain, including all sub-tier suppliers/individuals, through dissemination, education, and verification.

Governance

In line with Kellanova's global human rights strategy, Kellanova Australia's governance framework is overseen by the Directors of Kellanova Australia and is managed by a dedicated and passionate team including senior leaders, subject matter experts and relevant cross-functional working groups.

- Global social issues, including human rights, are overseen by the Kellanova Board of Directors, and are specifically managed through the Social Responsibility and Public Policy sub-committee of the Board.
- At a global executive level human rights issues are overseen by the Chief Sustainability Officer, who reports to the Senior Vice President, Chief Global Corporate Affairs Officer.
- At a day-to-day operational level these topics are managed collaboratively by our Corporate Affairs, Procurement, Legal, Human Resources and Supply Chain functions.
- Our local Human Rights Working Group which includes Corporate Affairs, Sustainability, Legal and Procurement representatives from the Australian business, works closely with the Kellanova AMEA (Africa, Middle East, and Asia) Responsible Sourcing and Procurement teams, and the Kellanova global Sustainability team, to deliver against our global human rights strategy and the annual Australian Modern Slavery report.
- In addition, Kellanova has Regional Better Days™ Promise Councils. The Councils ensure execution on priority strategies to maximize social and environmental performance and share best practices to ensure we are progressing against our commitments.

IDENTIFYING AND ADDRESSING HUMAN RIGHTS RISKS



Kellanova follows a risk-based approach to identify, prevent and mitigate potential and actual human rights impacts and modern slavery practices in our own operations as well as in our direct and extended supply chains.

In doing so, we use credible third-party data to further our understanding of risks and work with suppliers and other partners when taking preventive measures. Beyond Kellanova operations and sites, our approach extends to Tier 1 commodity suppliers and Tier 1 and Tier 2 ingredient and packaging suppliers as well as to farmers in our high-risk commodity supply chains.

In 2024, we continued our Kellanova site and supplier monitoring processes and supplier engagement programs as described on the following pages. In addition, following media reports about risks of modern slavery of temporary migrant workers in New South Wales, we also actively reached out to suppliers operating in the area to better understand their due diligence approaches.

Training and engaging our employees

Due to Kellanova Australia's strong policies, training, and monitoring processes, we consider the risk of modern slavery in our Australian workforce as low.

Our direct employees are employed through contracts of employment that are regulated by Australian employment laws and/or relevant industrial instruments. We respect our employees' right to freedom of association and have an enterprise agreement in place with our Botany factory operators, most of whom are union members.

Our contract workers are engaged through reputable, licensed service providers that have been doing business with Kellanova Australia for many years. We undertake periodic reviews of their workers' terms and conditions as well as on-the-ground checks to ensure these service providers are in compliance with legal obligations and the standards set out in our Supplier Code of Conduct which includes prohibitions on forced labour, recruitment fees and the restriction of freedom of movement.



To embed respect for human rights across our operations and to guide our employees on how to identify, prevent and respond to potential human rights issues and forced labour practices, all salaried employees at Kellanova Australia undertake human rights training every two years. Employees are also required to complete regular training on our Code of Ethics which sets out our commitment to sourcing responsibly and protecting human rights. Townhall sessions are also used to help raise awareness of human rights and to communicate our policies and standards to all Kellanova Australia employees. As we conducted a global Speak Up communication campaign in 2023, the next training for all salaried Kellanova employees will take place in 2025.

In 2024, we continued the implementation of the comprehensive onboarding process and tailored training for our procurement and sourcing teams to ensure robust knowledge and awareness of material risks relevant to our industry and business. In addition to the human rights training for new procurement staff, we held a responsible sourcing 101 training for all our AMEA procurement staff which extensively covered human rights risks and due diligence processes.



Third-party audits of Kellanova sites

Kellanova is committed to performing third party assessments of our owned operations in high-risk geographies to ensure compliance with our policies and commitments.

We primarily use the Sedex Members Ethical Trade Audit (SMETA) program. If during these audits, significant findings are identified, the site will be re-audited in one year's time. If no significant findings are identified, audits will be performed at a minimum of once every three years.

In 2024, none of Kellanova Australia's own operations were deemed high-risk. We imported products from two Kellanova owned sites in the US which were audited in 2024. At all facilities audited in 2024, no issues or indicators of forced labour, child labour, or bonded labour were found.

Monitoring our suppliers

We use the SEDEX platform to track supply chain locations and to inform our supplier risk profiling and supplier performance monitoring.

We encourage all in-scope suppliers to register on the Sedex platform and have their sites linked to us. This involves actively reaching 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 regularly update their SMETA audits, which enables us to assess audit status, including open non-conformances or pending actions on a site-by-site basis.

In-scope suppliers include all Tier 1 suppliers within the top 80% spend profile, all high-risk commodity suppliers (palm oil, cocoa, sugar cane), and high-risk indirect services. Indirect service providers include logistics and the provision of contracted labour such as cleaning and security.

We have an annual goal to maintain 80% of in-scope suppliers registered and active on the Sedex platform and 80% of all sites linked. As of December 2024, in the Kellanova AMEA region, of which Kellanova Australia is a part, 80% of in-scope suppliers are registered with Sedex and linked with Kellanova. This constitutes a decrease compared to the previous reporting year, and we continue to engage with our suppliers to driver higher registration rates.



Capturing worker voices and building capacity of our ingredient and packaging suppliers

In 2024, Kellanova Company continued the global Tier 1 and piloted a Tier 2 supplier engagement program with our global assurance partner LRQA.

To identify and address human rights including forced labour risks, the program deploys worker surveys that capture direct perceptions and opinions of a statistically significant sample of workers that on-site assessments alone cannot produce. To ensure anonymity, workers complete the survey on their mobile device via an online platform through a provided hyperlink and QR code.

Different survey tools are deployed depending on the supplier risk profile; survey results flag key areas of risk and allow us to manage direct worker feedback to improve worker well-being.

Tier 1 engagement program

Supplier sites participating in our Tier 1 program are selected based on the results of the 2019 risk assessment, which helped categorise our global suppliers into minimum, specialised, moderate and priority risk segments based on commodity and country risks. Starting in 2020 with 16 Tier 1 suppliers falling into the priority risk segment, we have continuously increased the scope of the program to also include suppliers from the moderate risk segment.

A total of 25 suppliers participated in the program between 2020 and 2023. In 2024, Kellanova Group engaged an additional 12 suppliers with sites across China, India, Thailand, Malaysia, Mexico and Brazil; including two suppliers of Kellanova Australia, bringing the total number of suppliers participating to 37.

Specialised assessment tools were deployed at each site that leverage worker surveys to draw on insights from those that have a direct understanding of working conditions and drivers of exploitation. The tools focus on issues that are difficult to detect such as wages, overtime, discrimination and forced labour. At one site in Malaysia with a higher presence of migrant workers, the tool deployed specifically focused on the International Labour Organization (ILO) indicators of forced labour. Across the two Kellanova Australia supplier sites, the survey engaged a total of 346 workers who provided insights into labour risk issues.

Based on the specific risk issues identified at each site, we implemented remediation processes encompassing eLearning and capacity building activities. Suppliers received guidance in conducting root cause analysis, developing action plans and implementing corrective actions. Remediation at the two Kellanova Australia supplier sites will be completed in early 2025.

Tier 2 engagement program

During the reporting period, Kellanova Australia continued the Tier 2 supplier engagement program that aims to establish visibility and identify forced labour risks beyond Tier 1.

Initiated in partnership with LRQA in 2023, the pilot program worked with our high-risk Tier 1 suppliers to determine four Tier 2 suppliers for engagement including three ingredient and one packaging supplier in Indonesia and Malaysia. Over the course of December 2023 and January 2024, we deployed worker surveys at each of the four supplier sites to assess forced labour risks. The surveys captured the voices of 354 workers and indicated the presence potential labour issues at one supplier site. Findings were shared with the concerned supplier for further investigation and with recommended remediation actions.

All participating Tier 2 suppliers agreed to share their assessment results with Kellanova Australia as well as with our Tier 1 suppliers. This allowed us to follow up directly on the assessment results with all suppliers involved in the program. As a result, we facilitated our Tier 1 suppliers in better understanding labour risks in their supply chains and to identify appropriate measures for remediation.



Addressing child labour risks in our U.S. supply chain with AIM Progress

In 2024, together with five U.S.-based brands, we initiated the creation of a remediation framework to address the concerning increase in cases of child labour violations and human trafficking in the U.S., particularly involving third-party labour providers in high-risk industries like manufacturing and food processing.

Once complete, the framework will help AIM-Progress members and their suppliers bring together businesses, community organisations, schools, government entities and other stakeholders to address these issues and uphold human rights.

Engaging and supporting farmers in our high-risk commodity supply chains

Through our **Kellanova's Origins™** programs we assess and address human rights risks, including modern slavery, in our high-risk commodity supply chains. Where relevant, these programs also provide funds or technical assistance to promote farmers' climate resilience and restore local ecosystems through improved agricultural practices.

The following section provides 2024 case study updates from **Kellanova's Origins™** programs, created to promote and protect human rights in the agricultural portion of our supply chain.



Our high-risk commodity supply chains

Drawing on data provided by the U.S. Department of Labor Bureau of International Labor Affairs (ILAB), AIM Progress, Consumer Goods Forum, 3rd party partners, Verite and Fair Labor Association (FLA), we have identified the following high-risk priority ingredients and sourcing countries combinations across the extended supply chain of Kellanova Australia:



Cocoa from
Ghana and
Côte d'Ivoire



Palm Oil from
Malaysia/
Indonesia



Sultanas from
Turkey



Sugar from
Thailand

CASE STUDY:

RESPONSIBLE COCOA SOURCING AND SUPPORTING THE LIVING INCOME OF SMALLHOLDER FARMERS



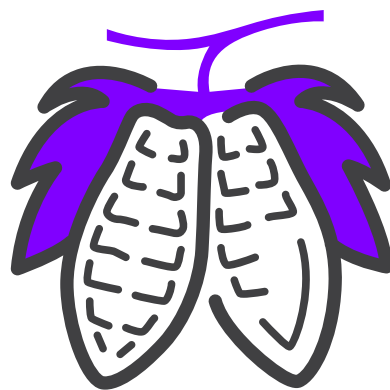
Since 2022, Kellanova has partnered with Enveritas, a non-profit that verifies global supply chains for multinational food companies. Their focus is on hard-to-reach, fragmented smallholder supply chains, such as cocoa and coffee. Our partnership with Enveritas focuses on our responsibly sourced cocoa supply chain in the Republic of Côte d'Ivoire.

The Enveritas assessment covers a wide range of social, environmental, and economic criteria including child labour, forced labour, deforestation and banned pesticide use. Utilising recent cutting-edge technological advances in AI and satellite imagery, the Enveritas system goes beyond traditional schemes through more efficient, effective, and comprehensive on-the-ground assessments that focus on progress over perfection, targeting smallholders, and holistic community specific interventions.

Through our ongoing work with Enveritas to assess and verify the Kellanova's cocoa purchases we continued to make progress towards our goal of 100% Responsibly Sourced Cocoa by 2030.

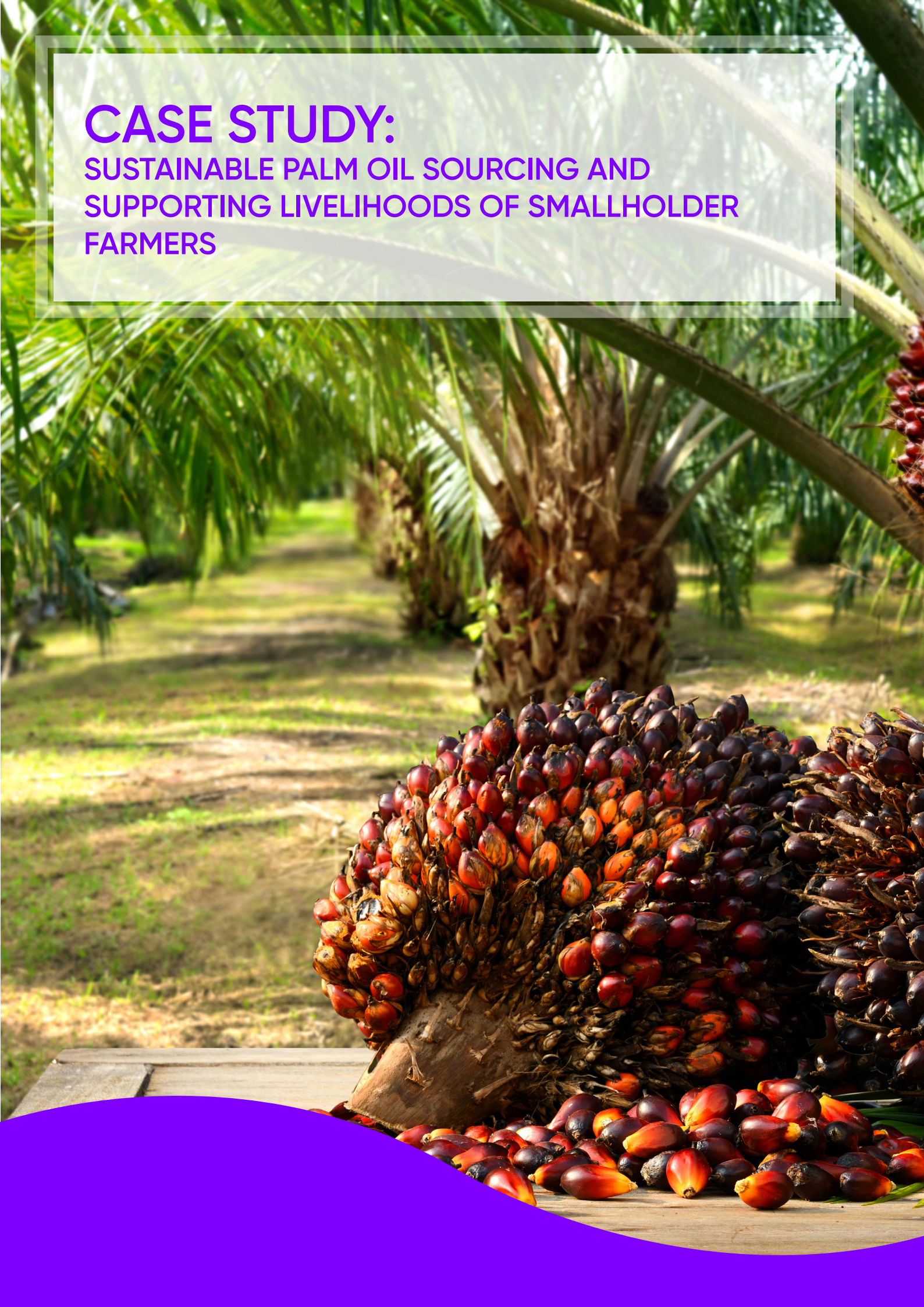
The partnership provides Kellanova with an overview of our procurement footprint in Cote d'Ivoire and related risks while helping smallholder farmers position themselves for participation in export markets. Each year, we are working to increase the percentage of our cocoa that is verified as responsibly sourced by Enveritas.

Also in 2024, Kellanova supported the work of Enveritas and MESAD (the Movement for Education, Health, and Development) which has focussed on two areas: improving access to education through the building of kindergarten and school facilities and improving the livelihoods of cocoa farmers through training on agricultural entrepreneurship, including sustainable agriculture and financial literacy. This important work will help increase the living income for 7,500 smallholder farmers, including 2,500 women farmers involved in the sustainable cocoa trade. It also will build long-term community capacity with the addition of computer technology and training of local professionals.



CASE STUDY:

SUSTAINABLE PALM OIL SOURCING AND SUPPORTING LIVELIHOODS OF SMALLHOLDER FARMERS



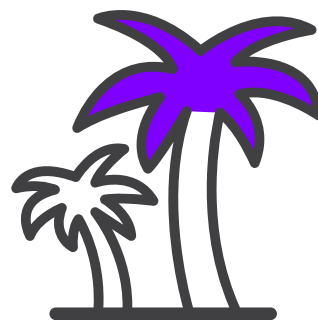
As part of our Kellanova Better Days™ Promise we are committed to procuring 100% physically certified palm oil by end of 2025.

To help us deliver on this commitment we are active members of the Roundtable on Sustainable Palm Oil (RSPO) and continue to work with our palm oil suppliers to capture traceability information and progress toward No Deforestation, No Peat, No Exploitation (NDPE) via the NDPE – Implementation Reporting Framework (IRF). Developed by the Palm Oil Collaboration Group, the NDPE IRF provides a shared and consistent view of progress towards NDPE commitments across the full supply base of companies throughout the supply chain.

To make sustainable palm oil the norm, not the exception, we support collaborative industry involvement. Kellanova is an active member of the Palm Oil Transparency Coalition (POTC), the [Consumer Goods Forum](#) Human Rights Coalition Palm Oil workgroup, the [Palm Oil Collaboration Group](#), and Kellogg Company is a founding member of the North American Sustainable Palm Oil Network. We participate in several other palm oil related industry group workstreams and maintain relationships with global and local NGOs.

In addition, we support the advancement of sustainable, transparent palm oil production through direct investment in on-the-ground projects. Since 2019, we have partnered with Wild Asia, an impact-driven social enterprise based in Malaysia, as part of our commitment to support the improvement of smallholder livelihoods and increase their access to market through formal certification. This ongoing engagement integrates our objectives with the work Wild Asia has been doing through their Small Producer Inclusivity & Resilience Alliance (SPIRAL) and Wild Asia Group Scheme (WAGS) programs by funding increased farmer reach, crop diversification to increase income, regenerative agricultural practices to improve yields and providing support for a path to certified operations.

Working with multiple funding partners and SPIRAL, we have helped 3,348 smallholder palm oil farmers improve their livelihoods by increasing their access to market. These programs include training on regenerative agricultural practices that increase yields and offer a path to MSPO (Malaysian Sustainable Palm Oil Certification Scheme) – and RSPO – certified operations that demand higher market value. Already, 2,233 independent producers have achieved certification of which 33% are women and 60% are native/indigenous people. Over time, the goal is to extend these efforts to 10,000 small producers in six regions across Malaysia and Thailand.



The background of the entire page is a close-up photograph of green grapes. A white rectangular box with a thin black border is positioned in the upper left quadrant, containing the title text. The grapes are in sharp focus, showing their individual shapes and slight variations in green color.

CASE STUDY:

RESPONSIBLE SOURCING OF SULTANAS AND
BUILDING CAPACITY FOR FARM LEVEL SOCIAL
COMPLIANCE MONITORING

Since 2020, we have supported the [Fair Labor Associations' \(FLA\) Harvesting the Future Project \(HTF\)](#) to advance our work in addressing human rights issues at origin and support the responsible sourcing of sultanas originating in Türkiye.

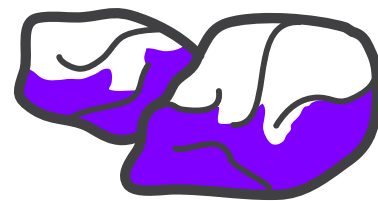
The HTF project grew from a vision to bring about far-reaching change in child protection and responsible recruitment to field workers by pursuing a multi-sector, multi-stakeholder and multi-geography approach. Companies that wanted to support meaningful and sustainable change for workers but were limited in creating a large-scale impact working on their own, joined forces through this project.

From 2020 to 2023, the project worked with eight of the most prominent sultana suppliers in the region, including suppliers in the Kellanova Australian supply chain. As part of the project, we conducted risk assessments at farm level and developed shared commitments on six priority areas:

- child labour
- hazardous work by young workers
- informality of employment relations
- excessive working hours
- lack of payment of minimum wages
- lack of basic service, such as water, hygiene, sanitation, and child protection.

In addition, suppliers received online training on worker rights in agriculture and on internal monitoring processes. Farmers, from which these suppliers sourced goods, were involved in pilot projects that addressed child labour remediation, farm-level monitoring, responsible recruitment, health and safety, grievance and living wages.

In 2024, the project supported suppliers in establishing labour standards compliance monitoring programs at field level through the provision of training, desk review of key documents, and shadowing of field-level activities by third-party experts. Kellanova focused efforts on two suppliers to dive more deeply into areas of high risk for non-compliance and to identify and disseminate best practices. Both suppliers received detailed feedback and recommendations on their monitoring programs.



GRIEVANCE MECHANISM



We provide multiple resources for our employees to report any suspected violations of our values, Code of Ethics or Supplier Code of Conduct. At the same time, we encourage our suppliers to provide effective means of confidential complaints and concerns reporting to all their employees.

As an example, the global Kellanova Ethics Line offers a confidential way for employees, suppliers, contractors and the general public to ask questions and report concerns regarding ethics, compliance or any other requirements in our Global Code of Ethics and Supplier Code of Conduct. The Ethics Line toll-free number is available in our Code of Ethics, and listed on Speak Up posters located around our facilities in local languages. Through the global Supplier Code of Conduct, we encourage our suppliers to communicate the availability of Kellanova's Ethics Line to their employees.

Operated confidentially by a third-party company, the Ethics Line is available 24/7 in multiple languages across 21 countries through a toll-free phone number, our website and the Kellanova Ethics Line mobile app.

The independent operator will listen to concerns or inquiries and provide a written summary to the Office of Ethics and Compliance for investigation and further action, as appropriate. Regional compliance leaders review and resolve complaints and inquiries consistent with our investigation protocols. All complaints and inquiries are monitored and subject to review at the corporate level. Our goal is to complete investigations within 14-45 days. Appropriate action is taken based on the findings. Lessons learned are used to prevent and detect future misconduct, ensure compliance, and find any other opportunities for improvement.

In 2024, most cases reported through the Ethics Reporting Line pertained to human resources questions or employment relations matters; there were no reports of forced labour and 100% of the investigations were satisfactorily completed.

Another reporting mechanism available to our employees is the Kellanova Employee Portal Information Center (EPIC), which provides our 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.

Available to anyone, the Kellanova Ethics Line mobile app allows users to anonymously report issues and track the progress and status of their complaint. Aside from the ability to report concerns, the app also provides access to our Code of Conduct, relevant policies, and training courses on various topics.

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

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS



During the reporting period we continued to apply a range of measures to assess how effective our actions to identify and address modern slavery practices in our operations and supply chains have been. These measures are described in more detail in previous sections of this statement and include:

- **The number of employees that complete human rights training:** In 2024, all new procurement staff undertook Modern Slavery training as part of their onboarding. In addition, responsible sourcing 101 training was rolled out to all our AMEA procurement staff.
- **The outcomes of third-party assessments in high-risk geographies:** In 2024, we conducted SMETA audits at two Kellanova Company sites in the US that are supplying to Kellanova Australia. No issues or indicators of forced labour, child labour, or bonded labour were found.
- **The percentage of Tier 1 suppliers registered and active on Sedex and the percentage of sites linked:** In 2024, 80% of the Kellanova AMEA in-scope suppliers were registered on Sedex and linked with Kellanova.
- **New supplier sites added to our supplier engagement program:** In 2024, we deployed specialised assessment tools at 12 new Tier 1 suppliers and continued engagement with four Tier 2 suppliers.

In addition, we use insights from our grievance mechanisms and our engagement with local stakeholders and international organisations to continuously inform our approach.

2024 Actions

- Training for 100% of Kellanova procurement team
- 80% suppliers registered on Sedex
- 12 new suppliers engaged in risk assessments
- 2 SMETA audits on owned-sites



LOOKING AHEAD



We remain steadfast in our commitment to continuously review and improve our response to human rights and modern slavery risks and to furthering our efforts to increase visibility and transparency into the lower tiers of our highest risk areas and commodities.

As such, we will continue auditing our high-risk sites and driving SEDEX registration and SMETA audits of our direct suppliers. Looking beyond Tier 1, we remain dedicated to investing in our Kellanova's Origins™ programs that help us achieve our responsible sourcing goals, address human rights impacts and support the livelihood of local farmers and communities. Further plans for 2025 include:

- We will extend our supplier engagement on human rights risks beyond commodity and packaging and ingredient suppliers to involve row crop suppliers through the deployment of a new extended version of our proprietary Grower Survey. The new version of this annual survey targeted at growers from select Tier 1 suppliers, will include additional human rights related elements to help us better understand on-site working conditions in our sourcing base.
- We will conduct specialised assessments to tackle modern slavery risks for foreign migrant workers through engaging with suppliers, service providers and manufacturing plants in high-risk locations.
- All global salaried employees will undergo mandatory training on our human rights policies and procedures.

Looking to 2025

- Extend supplier engagement program with T1 suppliers
- Continue Sedex and SMETA audit program
- Modern Slavery training deployed to all employees
- Conduct specialised assessments focused on addressing risks for foreign migrant workers



Approval

The statement has been approved by:



Anthony Holme,
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Janelle Meyers
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