



PALM OIL GRIEVANCE MANAGEMENT

Overview

General Mills remains committed to sourcing 100% of our palm oil from sustainable sources and we expect all actors within our supply chain to align with the elements set out within our NDPE policy (2022).

In order to ensure the effective handling of alleged cases of non-compliance against our policy and commitments, we have established an internal grievance management procedure. The purpose of this procedure is to set out the steps we will take to register, investigate, confirm, and pursue address or remedy cases of non-compliance in our palm supply chain.

As a downstream buyer, General Mills is typically indirectly exposed or linked to grievances associated with our upstream supply chain and production. A substantial part of our grievance handling therefore involves working through our direct suppliers both to ensure that they have in place adequate systems and process for managing grievances, and to ensure that remedial actions are taken further up the supply chain.

As a member of the Consumer Goods Forum Forest Positive Coalition Palm Oil Working Group, we support the recent development and introduction of the Monitoring and Response Framework (MRF) – an effort to streamline responses to cases of deforestation non-compliance in the palm supply chain. As a result, to enhance alignment with procedures established and agreed by the sector, we have adapted our grievance management process to embed the MRF key steps when handling deforestation non-compliances.

Consequently, our process for deforestation non-compliances now adopts the 3 scenarios established by the MRF and the 4 steps within each scenario. The scenarios are the following:

- Scenario 1: Deforestation non-compliance takes place inside a concession linked directly to a mill in the supply base or to group with mills in the supply base of a CGF FPC member.
- Scenario 2: Deforestation non-compliance occurs in an independent concession not part of a producer group and without any known links to existing mills.
- Scenario 3: Deforestation non-compliance occurs outside any known concession.

By adding Scenario 3 into our procedure, General Mills seeks to support collaborative efforts of the FPC to maintain inclusion of smallholder farmers within our palm value chains and to leverage the existing Landscape and Jurisdictional Initiatives wherever available, to address deforestation in the vicinity of smallholder production.

Governance

Our grievance procedure is overseen by our internal Grievance Management Committee, which is made up of key position holders drawn from General Mills procurement and global impact (sustainability) teams, working with the support of an external technical services provider. Severe or egregious cases of policy non-compliance – social or environmental – are elevated to our Global Impact Governance Committee which is led by our Chairman and CEO and consists of officers of the company.

1

RECEIPT AND REGISTRATION OF GRIEVANCE

Acknowledge receipt and register grievance.

2

PRELIMINARY REVIEW: VERIFY ALERT AND SUPPLY CHAIN LINK

Verify alert, confirm linkage, exposure (direct/indirect) and undertake initial review. Accept or reject. Update external grievance tracker.

3

INVESTIGATE AND ENGAGE SUPPLIER(S)

DIRECT SUPPLIER

Investigate grievance. For confirmed grievances seek timebound action plan for remediation and resolution.

INDIRECT SUPPLIER

Confirm tier one linkage to grievance and request further information. For confirmed cases, request timebound action plan.

4

EVALUATE SUPPLIER RESPONSE

Evaluate supplier response and/or action plan according to expectations. Apply decision on go/no-go sourcing where necessary. Elevate severe/egregious of non-compliance to Global Impact Governance Committee.

5

MONITOR AND REPORTING ON CORRECTIVE ACTION PROGRESS

Monitor progress of remedial actions taken. When expectations for recovery and/or remedy are met, inform key actors that case is closed. Update Grievance Tracker.