

Kellogg Company Supplier Code of Conduct

Kellogg Company (“Kellogg”) is committed to acting ethically. This commitment is reflected in our first core value “We Act with Integrity and Show Respect.” Our high ethical standards have been a part of why we have been successful in the past and will serve as a cornerstone for our future growth. For that reason we must ensure that everyone we do business with including suppliers, manufacturers, contractors, joint venture partners, agents, distributors and consultants (collectively, “Suppliers”) embrace and demonstrate the same high standards of ethical business behavior.

We require our Suppliers to comply with the expectations and standards of this Code of Conduct, and for their suppliers and sub-contractors to act in accordance with this Code as well. Failure to comply with any of these expectations and standards will require the Supplier to take immediate action to correct the deficiency and may result, in Kellogg’s sole discretion, in the termination of the contract between Kellogg and the Supplier.

Legal Compliance

We expect Suppliers to comply with all applicable laws and regulations. This includes all applicable local, state, provincial and national laws, codes, rules and regulations, as well as all applicable treaties and international standards.

Ethical Dealings

We expect Suppliers to compete fairly for our business, without paying or receiving bribes or kickbacks, or giving or receiving anything of value to secure an improper benefit or advantage, and avoiding all forms of corruption. This includes complying with the Foreign Corrupt Practices Act regardless of where in the world the Supplier is located and with the laws of the country in which the Supplier operates.

Employment Practices

We expect Suppliers to treat their employees with fairness, respect and dignity and to promote a work environment that is free of harassment, forced labor, corporal punishment or other forms of physical coercion.

We expect Suppliers to ensure child labor is not used in any operation. “Child” refers to any non-family member employed under the age of 15.

We expect Suppliers to comply with all applicable laws governing maximum work hours, vacation time, leave periods and holidays, and to provide compensation for overtime hours and mandated benefits in accordance with applicable laws.

We expect Suppliers to respect the right of employees to freely associate, organize and bargain collectively in accordance with applicable laws.

We expect Suppliers to base all conditions of employment on an individual’s ability to do the job and not on personal characteristics or beliefs, and to promote a workplace free from discrimination.

We expect Suppliers to only employ workers with the legal authorization to work and to ensure that authorization has been validated by the appropriate legal documentation.

We expect Suppliers to ensure they provide a safe and healthy working environment for all their workers.

Environmental Requirements

We expect Suppliers to conduct their operations in a way that reduces their impact on the environment, particularly in the areas of water use, energy use, green house gas emissions and waste disposal. We also expect Suppliers to comply with all applicable environmental laws and regulations.

Food Safety

We expect Suppliers to provide Kellogg with high-quality products, ingredients and services that meet all applicable quality and food safety standards, and to demonstrate that they have robust food-safety and quality-management systems. We expect Suppliers to immediately report to Kellogg any concerns about product safety.

Record Keeping

We expect Suppliers to maintain all financial books, records and accounts in accordance with applicable regulatory requirements and generally accepted accounting principles, including documentation related to food safety and traceability.

Confidential Information

We expect Suppliers to safeguard Kellogg's confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job. Suppliers should avoid discussion of confidential information in public areas such as planes, elevators, restaurants, mobile phones, and in online social networking sites (Facebook, LinkedIn, Twitter and others) as well as in personal and company blogs. This obligation to preserve Kellogg's confidential information may be ongoing, even after the business relationship ends.

Gifts and Entertainment (click the title to access the policy)

Kellogg employees are prohibited from accepting any gift, favor or entertainment if it will obligate or appear to obligate the recipient or otherwise influence any business decision. We expect Suppliers to avoid offering Kellogg employees any gift, favor or entertainment that would violate this prohibition and to never offer Kellogg employees gifts of cash or cash equivalents, such as gift cards.

Conflicts of Interest

We expect Kellogg employees to act in the best interest of our company and to have no interest with any Supplier that might conflict, or appear to conflict, with that obligation. We expect Suppliers to

disclose to Kellogg any relationship it may have with a Kellogg employee, or an employee's family members or close personal friends, which might represent a conflict of interest.

Assessment of Compliance

We expect Suppliers to cooperate with Kellogg and to allow Kellogg or any authorized third party to conduct audits to verify compliance with these standards or other required certifications. In the event any deficiencies are identified, the Supplier will take the steps necessary within an acceptable timeframe to correct any deficiency to Kellogg's satisfaction.

Reporting Concerns

We expect Suppliers who believe that an employee of Kellogg, or anyone acting on behalf of Kellogg, has engaged in illegal or otherwise improper conduct, to immediately report the matter to Kellogg. The Supplier can contact Kellogg's Office of Ethics and Business Conduct at 269-565-0660 or ethics.office@Kellogg.com or Report a Concern