

# General Mills Inc.

**TICKER**  
NYSE:GIS

**MARKET CAPITALIZATION**  
US\$33 billion

**HEADQUARTERS**  
United States

**COMPLIANCE**  
UK Modern Slavery Act: [Yes](#)

California Transparency in Supply Chains Act: [Yes](#)

**COMMITMENTS**  
[Yes](#)

**OVERALL RANKING**  
**14 out of 38**

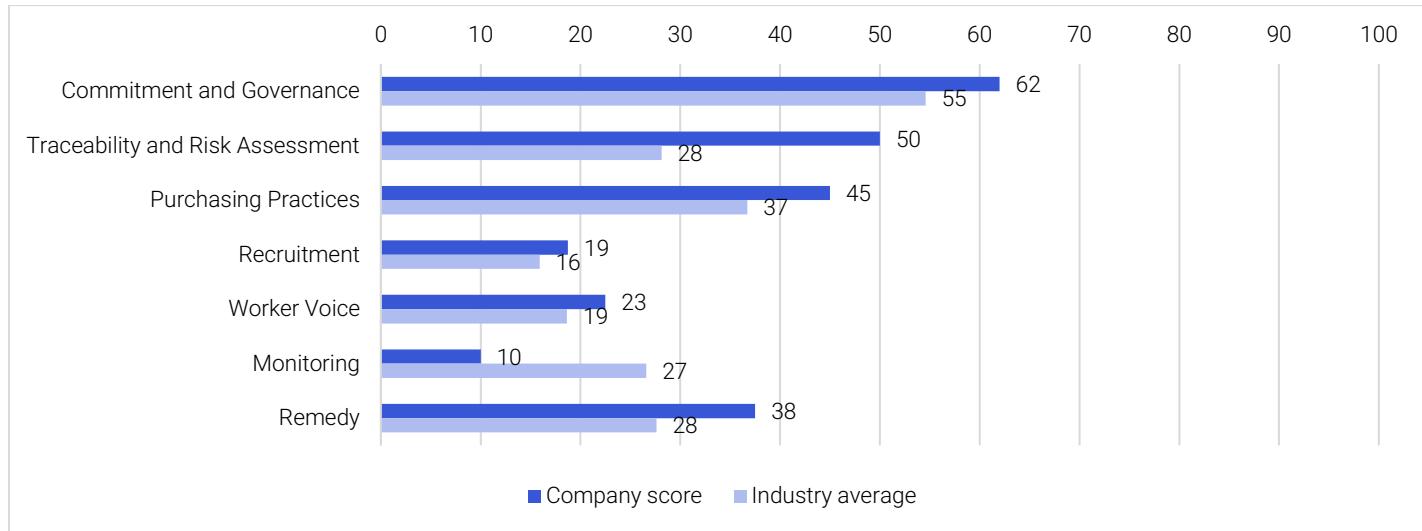
(2016: 6 out of 20)

**OVERALL SCORE**  
**35 out of 100**

## SUMMARY

General Mills Inc. (General Mills), a US-based manufacturer of consumer foods such as cereal, convenient meals, and snacks, ranks 14th out of 38 companies, disclosing more information on its forced labor policies and practices than its peers on all themes except monitoring. Since 2016, the company improved by disclosing details on its managerial structure on responsible sourcing, requiring its buyers to review their suppliers' sustainability practices and to assess forced labor risks at potential suppliers, and including worker interviews as part of its audits. Additional steps the company could take to address forced labor risks in its supply chains include strengthening its disclosure and practices on the themes of recruitment, worker voice, and monitoring.

## THEME LEVEL SCORES



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## LEADING PRACTICES

None.

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## NOTABLE FINDINGS

**Management and Accountability:** General Mills discloses that "operational accountability" for human rights topics lies with the Head of Global Supply Chain "supported by members of the Global Executive Team including the Chief Executive Officer as well as the heads of Global Legal, External Relations and Human Resources," and that oversight is provided by the Public Responsibility Committee of the Board of Directors. It further discloses that it has a dedicated manager responsible for the implementation of the responsible sourcing program and a cross-functional "Responsible Sourcing Forum" which meets quarterly to discuss priorities and progress.

**Traceability:** General Mills discloses that, through AIM-PROGRESS, it evaluated supply chain mapping approaches, services and technologies. In its supplier code of conduct the company includes a clause requiring suppliers to be "capable of disclosing potential sources of primary origin associated with the products or services provided to General Mills." General Mills discloses the names of some palm oil and sugarcane suppliers, as well as a frequently updated list of names and addresses of palm oil mills supplying its direct suppliers. The company also discloses some sourcing countries of commodities at risk of forced labor, such as palm oil, sugar cane, and cocoa.

**Purchasing Practices:** General Mills discloses that it aims for full certification of its sugarcane supply with the Bonsucro Production Standard (or comparable standards), which it describes as a "strategy" to respond to the challenges found in sugarcane sourcing, including forced labor. Further, the company states that, as of 2018, its buyers must assess forced labor risks at potential suppliers and include a "supplier responsibility review" in their annual category reviews.

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## OPPORTUNITIES FOR IMPROVEMENT

**Recruitment:** The company may consider developing and disclosing a policy that requires direct employment in its supply chains. In addition, the company may consider requiring recruitment agencies—and, where relevant, employment agencies—in its supply chains to uphold workers' fundamental rights and freedoms. The company is also encouraged to ensure that any such agencies used are monitored, and to provide details of how it supports ethical recruitment in its supply chains (for example, by using ethical recruitment agencies or supporting the development of ethical recruitment schemes).

**Worker Voice:** To prevent forced labor in its supply chains, the company is encouraged to work with relevant stakeholders to engage with and educate workers in its supply chains on their labor rights. To support collective worker empowerment, the company may further consider working with suppliers to improve their practices in relation to freedom of association and collective bargaining and working with local or global trade unions to support freedom of association in its supply chains.

**Monitoring:** While General Mills discloses that it undertakes supplier audits which include confidential worker interviews, and, beginning in 2018, begun requiring audits according to the SMETA system (which requires a review of relevant documents and of production facilities), the company is encouraged to disclose information on the results of its supplier audits, including the percentage of suppliers audited annually, the percentage of unannounced audits, the number or percentage of workers interviewed, information on the qualification of the auditors used, and a summary of findings, including details regarding any violations.

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## COMPANY PROVIDED ADDITIONAL DISCLOSURE

Yes.