

US corporate human rights index: Tracking changes in company commitments to human rights

Findings as of July 2025

PepsiCo

Indicator	Finding	Source	Source Link
Policies and commitments			
<u>General</u>			
Human rights policy - UNGPs	<p>PepsiCo is committed to respecting the rights of all individuals and communities throughout our value chain. Specifically, we are committed to respecting the rights and freedoms defined in the following international instruments:</p> <ul style="list-style-type: none"> - Universal Declaration of Human Rights - International Covenant on Civil and Political Rights - International Covenant on Economic, Social and Cultural Rights - International Labour Organization's Declaration on Fundamental Principles and Rights at Work - United Nations Convention on the Rights of the Child - United Nations Convention on the Elimination of All Forms of Discrimination against Women - United Nations Declaration on the Rights of Indigenous Peoples - International Convention on the Elimination of All Forms of Racial Discrimination - International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families <p>In fulfilling our responsibility to respect human rights, we are committed to implementing the UN Guiding Principles on Business and Human Rights throughout our business and reporting on our progress in line with the UN Guiding Principles Reporting Framework. We are also supporters, signatories, or members of the following frameworks: OECD Guidelines for Multinational Enterprises, UN Global Compact, UN Standards of Conduct for Business on Tackling Discrimination against LGBTI People, and Women's Empowerment Principles.</p>	Global Human Rights Policy	https://www.pepsico.com/docs/default-source/sustainability-and-esg-topics/pepsico-global-human-rights-policy.pdf
Human rights policy - ILO Core Labor Standards	See above		
Forced labor & prison labor	PepsiCo prohibits the use of all forms of forced labor, including involuntary prison labor, indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking.	Global Human Rights Policy	https://www.pepsico.com/docs/default-source/sustainability-and-esg-topics/pepsico-global-human-rights-policy.pdf
Human rights defenders & civic space	<p>We will not tolerate nor contribute to threats, intimidation, or attacks (both physical and legal) against human rights defenders.</p> <p>We expect our suppliers and business partners to uphold the same commitments, and we will use our leverage to help enable remedy where there is clear evidence... has adversely impacted... HRDs.</p> <p>We will continue to actively engage with these stakeholders, including HRDs... [to] help create safe and enabling environments for civic engagement and human rights around the world.</p>	PepsiCo Statement on Human Rights Defenders	https://www.pepsico.com/docs/default-source/sustainability-and-esg-topics/pepsico-human-rights-defenders-statement.pdf?sfvrsn=4050cc1b_3
Gender equality and women's empowerment	[Signatory of WEPs since 2010]	WEPs	https://www.weps.org/companies

Indigenous Peoples	<p>Secure land rights are a vital component of economic prosperity, sustainable food production and the responsible use of natural resources. This can be particularly true in developing countries and areas inhabited by indigenous communities, yet recent estimates indicate that only 30% of the world's population has a legally registered title to their land. 1 Land rights issues have the potential to directly impact local communities and the daily lives of rights holders, such as through physical displacement or the loss of economic opportunity. [Webpage - Human Rights]</p> <p>This Global Policy on Sustainable Palm Oil includes our commitments to no deforestation, no development on peat, and no exploitation of the rights of indigenous peoples, workers and local communities ("NDPE commitments") [Palm Oil]</p>	<p>Webpage - Human Rights</p> <p>Global Policy on Sustainable Palm Oil</p>	<p>https://www.pepsico.com/our-impact/esg-topics-a-z/human-rights</p> <p>https://www.pepsico.com/docs/default-source/sustainability-and-esg-topics/global-policy-for-sustainable-palm-oil.pdf?sfvrsn=57aba3ae_2</p>
<u>Natural resources</u>			
Land rights	<p>PepsiCo recognizes that secure land rights are a vital component of economic prosperity, sustainable food production, and the responsible use of natural resources. As outlined in our Land Policy, we have a zero- tolerance policy for illegal activities in our operations and a zero-tolerance policy for land displacements of any legitimate land tenure holders. When PepsiCo acquires land (including purchasing, leasing, and utilization), we will engage in fair and legal negotiations and use the IFC Performance Standards to implement the Free, Prior, and Informed Consent (FPIC) principles for agricultural development in developing countries.</p>	Global Human Rights Policy	https://www.pepsico.com/docs/default-source/sustainability-and-esg-topics/pepsico-global-human-rights-policy.pdf
Free, Prior, and Informed Consent (FPIC)	See land rights		
<u>Living wage</u>			
Living wage, own operations	<p>We believe that all of our employees should be paid a wage sufficient to afford a decent standard of living, and we are committed to providing fair wages and equitable benefits for our employees and their families.' [Global Human Rights Policy 2022, PDF 3]</p>	Global Human Rights Policy	https://www.pepsico.com/docs/default-source/sustainability-and-esg-topics/pepsico-global-human-rights-policy.pdf
Living wage in supply chain	<p>We believe that everyone should earn a wage sufficient to afford a decent standard of living, and we have established several initiatives aiming to help advance fair pay and employment conditions throughout our direct operations and supply chain.</p>	Webpage - Human Rights	https://www.pepsico.com/our-impact/esg-topics-a-z/human-rights
Human rights due diligence and supply chain			
Process for assessing human rights risks and impacts	<p>We have established a due diligence process that assesses potential human rights impacts within our business and supply chain, integrates its findings into our internal systems, tracks the effectiveness of our actions and regularly communicates our progress. Our due diligence process focuses first on our direct operations and strategic, direct tier-1 suppliers.</p> <p>Our process utilizes a risk-based approach to help monitor risk and assess, identify and remediate potential impacts within our business and supply chain. When needed, we may increase the frequency and/or type of due diligence assessment in response to new events such as entry into new markets, onboarding of new suppliers or emerging human rights challenges in certain markets.</p> <p>We are continuing to expand our due diligence programs to integrate new assessment tools and to cover additional areas of our supply chain, including our third-party labor providers and transportation and logistics providers. We also regularly integrate new assessment tools into our due diligence process. For example, in 2021, we piloted an independent remote worker voice initiative in the United States, which we expanded to additional worker groups in Mexico, Egypt and Saudi Arabia in 2022. Learnings and insights from our due diligence programs are regularly integrated into our internal processes to help ensure that we have the appropriate policies and management systems in place to prevent, identify and address potential human rights risks within our business and supply chain.</p>	Webpage - Human Rights	https://www.pepsico.com/our-impact/esg-topics-a-z/human-rights

Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)	For those products in our supply chain that include conflict minerals that are necessary to the functionality or production of the products, we follow due diligence procedures consistent with the processes and procedures set forth in the Organization for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.	Conflict Minerals Policy	https://www.pepsico.com/docs/default-source/policies/conflict-minerals-policy.pdf?sfvrsn=c2381c7f_3
Affected stakeholder engagement	<p>We also recognize the importance of capturing the voice of rights holders through this process, and we are committed to engaging with potentially and actually affected rights holders in the development and management of our human rights approach.</p> <p>Throughout the year, we regularly engage with a wide range of stakeholders through a variety of engagement mechanisms such as direct consultations, worker roundtables, landscape programs and multi-stakeholder collaborations.</p>	Webpage - Human Rights	https://www.pepsico.com/our-impact/esg-topics-a-z/human-rights
Human rights requirements in supplier code/requirements	<p>All suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with or on behalf of PepsiCo ("suppliers") are expected to follow the Supplier Code and all other relevant policies as a condition of doing business with PepsiCo and its affiliates...</p> <p>[Footnote] pplicable policies/commitments include PepsiCo's: (i) Environmental Health and Safety Policy, (ii) Sustainable Agriculture Policy, (iii) Land Use Policy, (iv) Forestry Stewardship Policy, (v) Sustainable Packaging Policy, (vi) Cage-Free Egg Policy, (vii) Human Rights Workplace Policy, (viii) Palm Oil Commitments, (ix) Cane Sugar Commitment, and (x) Global Anti-Bribery Compliance (ABAC) Policy.</p>	PepsiCo, Inc Global Supplier Code of Conduct	https://www.pepsico.com/docs/default-source/sustainability-and-esg-topics/supplier-code-of-conduct/pepsico-supplier-code-of-conduct---english.pdf?sfvrsn=67dd868f_28
Access to remedy			
Grievance mechanism for own employees	<p>If you are aware of something that may be a violation of our Code, our policies or the law, you must speak up and report it so it can be addressed. You have several channels to seek guidance or make a report: Your immediate manager, next level manager or Human Resources manager: In most cases, your immediate manager should be your first point of contact. You should immediately contact your manager to report issues that require urgent attention, such as workplace violence, employee health and safety, and food safety. [...] Global Compliance & Ethics or the PepsiCo Law Department: For issues involving actual or potential Code or legal violations, you should contact Global Compliance & Ethics or the Law Department.' [Global Code of Conduct 2022, 9]</p>	<p>Global Code of Conduct 2022</p> <p>Webpage - Speak Up</p>	<p>https://www.pepsico.com/docs/default-source/global-code-of-conduct/pepsico-global-code-of-conduct/english_pepsico_global_code_of_conduct_booklet-1.pdf?sfvrsn=f6422b75_28</p> <p>https://secure.ethicspoint.com/domain/media/en/gui/52943/index.html</p>
Grievance mechanism for workers - supply chain	To register a grievance, please email SustAg@PepsiCo.com. Grievances raised directly with PepsiCo employees, and through Speak Up! will also be entered into the process. Our intent is that the Grievance Mechanism will be run on the principles of transparency, consistency, and neutrality. Our experience with grievances raised by third parties until now is that they are often complex, involving multiple actors and differing perspectives on the situation and potential remediation efforts. Our aim is to uphold our policies and to achieve outcomes that help people whose rights may have been affected in a way that is satisfactory to all parties of the complaint.	PepsiCo Grievance Mechanism for our Agriculture Supply Chain	https://www.pepsico.com/docs/default-source/policies/agricultural-supply-chain-grievance-mechanism-summary.pdf?sfvrsn=c80d3480_5
Grievance mechanism for external individuals & communities	See above		
Governance and staffing			

Board and/or C-Suite-level oversight	<p>The Board plays an essential role in determining our strategic priorities and considers ESG issues (including human rights) as an integral part of its business oversight. To this end, the Board established a Sustainability and Public Policy Committee to assist them in providing more focused oversight of key sustainability, inclusion and public policy matters...</p> <p>Embedding sustainability within our business requires the commitment of our senior leadership, who drive the necessary mindset throughout their respective areas of oversight. Our Chairman & CEO, his direct reports and top functional leaders have direct oversight of the sustainability agenda (including human rights), strategic decisions and performance management and receive updates regularly. This ensures that sustainability is a key accountability factor for every member of our senior leadership team.</p>	Webpage - Human Rights	https://www.pepsico.com/our-impact/esg-topics-a-z/human-rights
Senior level responsibility for human rights	<p>Our Global Human Rights Office is led by PepsiCo's Chief Human Rights Officer (CHRO) who also serves as Senior Vice President and Chief Counsel for Global Human Resources at PepsiCo, reporting directly to our Executive Vice President, General Counsel and Corporate Secretary. It is a dedicated team within our Law Department that is responsible for driving our global human rights strategy, managing progress against our goals and our salient human rights issues. The team oversees our human rights due diligence programs and works closely with other internal stakeholders such as Human Resources, Global Sustainability, Sourcing and Procurement on implementing our strategy within our business and supply chain.</p>	Webpage - Human Rights	https://www.pepsico.com/our-impact/esg-topics-a-z/human-rights
Reporting and transparency			
Human rights reporting (integrated or stand-alone)			
Memberships			
RBA	No	RBA	https://www.responsiblebusiness.org/about/members/
RSPO	Yes	RSPO	https://rspo.org/search-members/
WEPs (signatory)	Yes	WEPs	https://www.weps.org/companies
Lobbying and ethics			
Public statement or endorsement in support of mandatory human rights and environmental due diligence	<p>"We are proud of our work on human rights at PepsiCo, but recognize that, as with all companies, challenges remain when it comes to respect for human rights across our entire value chain. So, naturally, as we've seen a proliferation of regulatory initiatives on modern slavery, child labor, or human rights due diligence, there has been some apprehension among businesses about what this may mean in terms of liability for potential impacts occurring deep in the supply chain. But it's clear that the time has now come to embrace this conversation and, in good faith, to discuss the opportunities and potential drawbacks of different types of mandatory measures as we try to further scale the implementation and impact of the UN Guiding Principles. "</p> <p>MICHELE THATCHER SENIOR VP, CHIEF COUNSEL GLOBAL HUMAN RESOURCES & CHIEF HUMAN RIGHTS OFFICER, PEPSICO</p>	Shift - Let's Talk Mandatory Measures	https://shiftproject.org/wp-content/uploads/2019/11/BHR_MandatoryMeasures_vNov23.pdf

Anti-bribery and anti-corruption policy

This policy emphasizes PepsiCo's obligation to act ethically and responsibly in all business dealings by providing a clear framework that: Prohibits both public sector and commercial bribery; [...] Emphasizes the importance of maintaining accurate books and records for all PepsiCo transactions.' [Global Anti-bribery Compliance Policy 2021, 1]

'PepsiCo prohibits any form of corruption in our business dealings. You must not pay bribes to anyone, anywhere, for any reason. You may not accept anything of value that might affect your objectivity in doing your job.' [Global Code of Conduct 2022, 23]

Global Anti-bribery
Compliance Policy

Global Code of Conduct

https://www.pepsico.com/docs/default-source/global-code-of-conduct/global-anti-bribery-compliance-policy/english-global-anti-bribery-compliance-policy.pdf?sfvrsn=910ca3b7_6

https://www.pepsico.com/docs/default-source/global-code-of-conduct/pepsico-global-code-of-conduct/english_pepsico_global_code_of_conduct_booklet-1.pdf?sfvrsn=f6422b75_28

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